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Hearing Room 4

Keystone Building, 1st Floor

400 North Street

Harrisburg, PA

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BOOK I

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

BEFORE

THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Information Submitted Pursuant to

Section 53.51 et seq of the Commission's Regulations

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SUPPLEMENT NO. 294

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Issued: January 28, 2026 **Effective: March 29, 2026**

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STATEMENT OF REASONS

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
2026 Base Rate Case
Docket No. R-2025-3059428

STATEMENT OF REASONS

I. INTRODUCTION

National Fuel Gas Distribution Corporation's ("NFGDC") Pennsylvania Division ("National Fuel" or "Company") is filing Supplement No. 294 to National Fuel Gas Tariff – Pa. P.U.C. No. 9 ("Supplement No. 294"), with a proposed effective date of March 29, 2026.[1] The rates set forth in Supplement No. 294, if approved by the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission"), would increase the Company's annual revenues by $19.7 million, or by 7.4%.[2] In addition, Supplement No. 294 also proposes additional changes to tariff rates, riders, and tariff terms and conditions as described in the filing.

The following monthly bill impact analysis applies to National Fuel's customers. It assumes that the Company's proposals for full rate relief are accepted.

Table 1 - AVERAGE MONTHLY BILL IMPACT

Customer Class	Average Usage per Month	Current Rates	Proposed Rates	($) Increase	(%) Increase
Residential	80 ccf	$83.49	$88.44	$4.95	5.9%
Commercial / Public Authority					
SCPA < 250	103 ccf	$101.91	$107.85	$5.95	5.8%
SCPA > 250	412 ccf	$276.57	$288.37	$11.80	4.3%
LCPA	340 Mcf	$1,113.90	$1,143.80	$29.89	2.7%

[1] It is anticipated that the rates proposed in Supplement No. 294 will be suspended until October 29, 2026.
[2] As explained below and in the Company's direct testimony, the Company has also proposed a new five-year energy efficiency pilot program that would recover additional program costs from residential customers annually in a separate rider.

National Fuel makes this tariff filing principally: (1) to allow it to earn a fair return on investments used and useful to continue to provide safe and reliable service to the public; (2) to support its infrastructure replacement programs designed to enhance safety and reliability; (3) to address increasing levels of operating costs, which are principally being influenced by broader macroeconomic trends; and (4) to mitigate the adverse impacts of warmer weather trends on customer usage. Each of these reasons is discussed in more detail below and in the Company's testimony. As compared to current plant and base rate levels reflected in existing rates, National Fuel projects an increase of approximately $133 million in gross plant through the Fully Projected Future Test Year ("FPFTY") ending October 30, 2027. Accordingly, this revenue increase is essential to attract the investments necessary to operate and maintain safe, reliable, and customer-focused natural gas distribution services.

II. REASONS FOR THE REQUESTED REVENUE INCREASE

1. Fair return on investments used to serve the public

A variety of circumstances will prevent the Company from earning a fair rate of return at present rate levels. As reflected in National Fuel Exhibit A (FPFTY), the Company's operations are projected to produce an overall return on rate base of 6.30%, which equates to a return on common equity of only 6.87% for the FPFTY. As explained by Company Witness Joshua C. Nowak (National Fuel Statement No. 10), those returns are not adequate based on an analysis of applicable financial market data and the risks confronted by the Company and are well below the rates of return generally afforded to public utilities. Unless National Fuel receives the requested rate relief, the Company's returns will continue to erode and jeopardize its ability to attract the capital needed to make the reasonable and necessary investments in gas infrastructure and the human resources that are necessary to maintain and enhance the provision of safe and reliable

natural gas service to its customers.

2. Support for the Company's accelerated infrastructure replacement program

Significant capital investment in the distribution system is a primary driver for the requested rate relief in this proceeding. Upgrading and modernizing the distribution system facilitates the provision of safe, reliable, and reasonable service to customers. Accordingly, the Company is replacing its non-contemporary infrastructure at an accelerated pace, as described in its recently-filed Amended Long Term Infrastructure Improvement Plan ("LTIIP").[3] The investment in net plant in-service for the FPFTY ended October 31, 2027 is projected to be $637 million. When the Company last requested a rate increase for the FPFTY ended July 31, 2024, the Company's investment in net plant was approximately $496 million. The $141 million increase in net plant has largely been the result of continued investments necessary to enhance and maintain the safety and reliability of the Company's distribution system, which include the replacement of aging gas plant infrastructure. Since 2016, the Company's Systematic Replacement Program has eliminated over 371 miles of leak-prone bare steel and wrought iron pipeline and 7,337 base steel services. This represents a significant acceleration of investment and replacement over historical levels.

3. Address Operating Cost Inflation

Like most businesses today, National Fuel has been impacted generally by the inflationary pressures that continue to challenge the economy. However, when considering the net impact of operating expenses since the last rate case, the biggest item impacting the increase in operating expenses is net labor. National Fuel's net labor expenses have been impacted in two ways. First, the Company continues to manage employee retention through competitive wages

[3] Docket No. P-2022-3034957.

and benefits to ensure that qualified and trained employees are not lost to other employers. Second, net labor has increased due to the results of recent negotiations and ratification of collective bargaining agreements impacting approximately half of National Fuel's workforce. These changes have resulted in net labor being the biggest driver of the increase in operating expenses since the Company's last rate case.

4. Address Weather Impacts on Usage

The Company's residential and commercial usage has been significantly impacted by warmer winters in the Company's service territory. The trend of warmer winters and extreme volatility in heating degree days from year to year has had a significant impact on the Company's throughput and revenues. The Company is proposing to take two steps to consider and mitigate the adverse impact of warmer weather trends on customer usage. First, the Company modified its volumetric forecasting approach to use a 10-year average of heating degree days data published by NOAA as observed at the Erie, Pennsylvania International Airport from 2015 to 2024. The Company relied on a 15-year average of annual heating degree days in the last rate case and believes that updating to a 10-year average is more indicative of a normal winter in the Company's service territory. Second, the Company is proposing to make the Weather Normalization Adjustment ("WNA") mechanism permanent to protect customers from higher bills when actual weather is colder than normal and help insulate the Company's authorized delivery revenues when actual weather is warmer than normal. The benefits and components of the proposed WNA mechanism are explained in detail in the direct testimony of Mr. John D. Taylor (National Fuel Statement No. 19).

III. MANAGEMENT EFFECTIVENESS

National Fuel has successfully provided customers safe and reliable service at the lowest

rates of all major natural gas utilities in Pennsylvania. National Fuel's management effectiveness is evidenced in the following areas:

Safety Culture

- National Fuel has a long-standing culture of safety that encourages continuous improvement of its safety performance, with demonstrated success in several areas. Principally, National Fuel has made significant progress in the modernization of its system, and the replacement of leak prone pipe. The Company plans to continue to accelerate its pipeline replacement program so that all remaining bare steel and wrought-iron mains and transmission lines will be removed by 2039. Furthermore, the Company has significantly reduced the number of leaks on its system, as well as damages to its system over the last five years.
- The Company also educates and builds awareness with its customers so they can act safely if they smell gas in their homes. In the event of an emergency, National Fuel rapidly and thoroughly responds; the Company's average emergency response time is less than 45 minutes more than 99% of the time.
- Finally, National Fuel has implemented employee training and safety initiatives including the launch of the successful Safety Improvement Team ("SIT"), whose primary job is to proactively identify potential areas of continuous safety improvement and engage employees to reinforce the Company's commitment to safety. In 2025, National Fuel Gas Company's ("NFG") consolidated operations reported the lowest Occupational Safety and Health Administration ("OSHA") Days Away, Restricted or Transferred Rate in its history.

Quality Customer Service

- National Fuel maintains high levels of customer satisfaction. The Commission's 2024 Customer Service Performance Report showed that the Company scored at or above the Pennsylvania state average for natural gas distribution companies in a majority of the report's satisfaction survey categories, including lowest in call abandonment, satisfaction with representative's handling of the contact and ease of reaching the Company, and second only to one other utility in answering customer calls within 30 seconds which is particularly impressive since the Company does not employ an automated voice system to handle customer calls. The Company has also increased customer satisfaction by acknowledging that customers' time and schedules are important, by consistently maintaining over 99% of appointments kept for the last five years.

Information Technology and Cybersecurity

- National Fuel has made significant enhancements to continue to strengthen the Company's cybersecurity posture, including increasing the number of applications with single sign-on capabilities, increasing the nature and frequency of cyber trainings for employees, aggressively managing patch management practices for applications and actively addressing system vulnerabilities, and improved response times for Security Information and Event Management alerts. The Company also recently established a 24/7 cybersecurity command center for continuous monitoring, which is significantly improving detection and response capabilities for both physical and cybersecurity threats,

while also tracking system uptime and availability to enable immediate action when issues arise. In a recent review completed by the Transportation Security Administration of cybersecurity practices at the top 100 gas companies throughout the country, National Fuel ranked among the top 10%.

Affordability and Operational Efficiencies

- National Fuel currently has the lowest total bills and delivery rates in the Commonwealth amongst large natural gas utilities. Its customers have benefited from consistently low delivery rates for more than a decade while enjoying access to the lower cost natural gas supplies produced in Pennsylvania. National Fuel's focus on cost control, productivity, and ability to optimize operational efficiencies is a major driver of the Company's ability to keep its delivery rates low. Even with the proposed rate increase, the Company anticipates that it will continue to lead its Pennsylvania natural gas peers in affordability. In addition, the Company's proposal includes a tariff rider that would reinstate a passback of Other-Post Employment Benefits ("OPEB") funds of approximately $6.2 million and also provide a one-time bill credit of $30, totaling approximately $1.025 million, to CAP, Level 1, and Level 2 customers.

Universal Services and Customer Payment Assistance

- National Fuel continues to be attentive to meeting the needs of its low-income customers through its customer assistance programs. These include the Company's Low-Income Residential Assistance program, Low-Income Usage Reduction Program, as well as the Company's diligent efforts to connect its low-income and payment troubled customers with all available forms of assistance (e.g., Low Income Home Energy Assistance Program ("LIHEAP")).

Community Engagement and Impact on Local Economies

- Finally, National Fuel and its employees support the communities where they live and work. This support includes charitable contributions and volunteer opportunities. In addition to these philanthropic endeavors, the Company and NFG as a whole continue to have a significant impact on the local economies of the communities they serve and contribute to the regional economy through employee wages, payments to local vendors, taxes, royalties and capital investment.

The identified initiatives and efforts, as described by the Company's witnesses, demonstrate National Fuel's commitment to providing safe, reliable, and high quality distribution service to its customers. The Company believes that its management efforts, system investments, and continued provision of safe and reliable service at reasonable rates, as detailed in the testimony submitted in this case, all strongly support an upward adjustment of 25 basis points to the Company's rate of return on common equity. This upward adjustment is included in

the 11.25% return on common equity requested by the Company and is discussed in the Direct Testimony of Joshua C. Nowak (National Fuel Statement No. 10).

IV. OVERVIEW OF FILING

Included with National Fuel's filing is the supporting data required by the Commission's regulations. This information includes data for the historic test year ("HTY") ended September 30, 2025, a future test year ("FTY") ending September 30, 2026, and a FPFTY ending October 30, 2027. In accordance with permitted ratemaking procedures, the Company has elected to use the FPFTY as the basis for its proposed revenue change. National Fuel has followed Commission ratemaking practice in preparing its claims for rate base, operating revenues and operating expenses.

Rate Base. Rate base was determined based on depreciated original cost values for projected plant in service at the end of the FTY and FPFTY, respectively. The Company's rate base claim also includes reasonable estimates for materials and supplies inventory and cash working capital, as well as standard deductions for accumulated depreciation, accumulated deferred income taxes, and customer deposits. The Company's rate base claim is shown in summary form in Schedule C-1 to Exhibit A (FPFTY) and is principally supported by the Direct Testimony of Monika M. Duszenko (National Fuel Statement No. 6).

Operating Revenues. National Fuel's *pro forma* test year operating revenues were derived from its annual five-year revenue forecast. As explained in the testimony of Courtney T. Mann (National Fuel Statement No. 14) and other witnesses, operating revenues were annualized, normalized, and otherwise adjusted in accordance with standard ratemaking practice,

as detailed in Schedules D-5 and D-5A of Exhibit A (FPFTY) and the exhibits attached to Ms. Mann's testimony.

Operating Expenses. National Fuel's *pro forma* test year operating expenses were derived from its annual budgeting process. As explained in the testimony of Anthony Formato (National Fuel Statement No. 3) and other witnesses, certain operating expenses were annualized, normalized, and otherwise adjusted in accordance with standard ratemaking practice, as detailed in Section D of Exhibit A (FPFTY). The Company's claim for depreciation and amortization expense is supported by Exhibit C (Fully Projected) to the filing, and exhibits developed and supported by John J. Spanos of Gannett Fleming Valuation & Rate Consultants, LLC (National Fuel Statement No. 8). Mr. Spanos's calculations are based on the straight-line, remaining life method previously approved for National Fuel's operations by the Commission.

Income Taxes. National Fuel's income tax expense was calculated using procedures previously accepted by the Commission. The Company's filing continues to reflect normalization accounting with respect to the catch-up amount of the tax repairs deduction for federal tax purposes and flow through accounting with respect to current years' federal tax deductions. The Company continues to use flow-through for rate making purposes as related to state taxes. The Company's tax claims are described and supported in the Direct Testimony of Erica L. Forcucci (National Fuel Statement No. 12).

Revenue Allocation and Class Cost of Service. National Fuel is proposing to allocate the revenue requirement to all customer classes based on the results of a cost of service study.

The Company's proposed revenue allocation will move all rate classes toward the overall system average rate of return. Additional details regarding the Company's cost of service study and revenue allocation are provided in the Direct Testimony of John D. Taylor (National Fuel Statement No. 19).

Rate Design. The Company's proposed rate design was developed in conjunction with Company Witness John D. Taylor's Allocated Cost of Service Study ("ACOSS"). The proposed revenue increases were allocated to the Company's service classes based on current rates of return for each class and the desire to gradually move toward full parity. Full parity means the revenues collected from individual service classes are aligned with the cost of service associated with that service class. After allocating the revenue increase, the rate design process consists of setting the basic service charge, resetting riders, and allocating the remaining increase to the volumetric distribution charge. As part of this case, National Fuel is proposing to increase the fixed monthly customer charges for the residential, certain commercial and large industrial classes. Details of the Company's rate design proposals are found in the Direct Testimony of Courtney T. Mann (National Fuel Statement No. 14).

Other Tariff Changes. In this filing, the Company proposes relatively few changes to the terms and conditions approved by the Commission in the Company's most recent completed rate case. One such change is a proposed Energy Efficiency tariff rider, which will collect funding for a new energy efficiency pilot program from residential customers. A list of all proposed changes is identified in the Company's proposed tariff, Supplement No. 294.

V. CONCLUSION

The proposed revenue increase is the minimum increase necessary for the Company to continue providing safe and reliable service, to maintain the integrity of its financial ratings, to attract additional capital on reasonable terms, and to have a reasonable opportunity to earn a fair rate of return on property that is used and useful in providing natural gas service to the public within its service territory. The proposals contained in this filing will provide significant benefits to all stakeholders. Moreover, the Company's proposed revenue allocation and rate design are just and reasonable and non-discriminatory, as are the proposed changes made to the Company's general terms and conditions of service. Therefore, the rates, rules, and terms and conditions of service set forth in Supplement No. 294 should be permitted to become effective as filed.

PLAIN LANGUAGE - STATEMENT OF REASONS

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
2026 Base Rate Case
Docket No. R-2025-3059428

PLAIN LANGUAGE STATEMENT OF REASONS

National Fuel Gas Distribution Corporation's ("NFGDC") Pennsylvania Division ("National Fuel" or "Company") has asked the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission") to increase its annual jurisdictional revenues by $19.7 million, or by 7.4%.[4] The percentage rate increase will vary by rate class. The main reasons for this proceeding are:

- National Fuel continues to invest in gas plant needed to provide continued safe and reliable service, and intends to accelerate these investments. Since 2016, the Company's Systematic Replacement Program has eliminated over 371 miles of leak-prone bare steel and wrought iron pipeline and 7,337 base steel services. This represents a significant acceleration of investment and replacement over historical levels.

- National Fuel seeks to recover increased labor and employee costs, which are necessary to attract, maintain, and promote a highly qualified work force.

- National Fuel proposes to make its Weather Normalization Adjustment ("WNA") pilot permanent, to limit the variability of over- or under-collections of non-gas margin revenues due to weather during the heating season (*i.e.*, October through May).

- Without substantial rate relief, the Company will not be able to earn a fair return on its investment used to serve the public and, if not addressed, this could adversely affect the integrity of its financial ratings and its ability to provide safe and reliable service to its customers.

- National Fuel is proposing to increase the fixed monthly customer charges for the residential, certain commercial and large industrial classes.

The Company designed the proposed rates for each customer class to recover its total

[4] As explained below and in the Company's direct testimony, the Company has also proposed a new five-year energy efficiency pilot program that would recover program costs from residential customers annually in a separate rider.

required revenue. In allocating the revenue increase to the residential and non-residential customer classes, National Fuel was guided by detailed studies of each rate class's cost of service. The Company also considered and balanced other principles of rate design consistent with the Commission's approach to ratemaking.

Along with its rate increase, National Fuel has filed all supporting data required by the Commission's regulations, as well as the written statements of twenty witnesses and numerous exhibits prepared by those witnesses. The data, testimony, and exhibits submitted by the Company comply with the Commission's filing requirements. The proposed distribution revenue increase is the minimum increase necessary for National Fuel to continue providing safe and reliable service to the public within its service territory.

SECTION 53.52 - FILING REQUIREMENTS

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

Proposed Changes to NFGDC – PA Division, Supplement No. 294 to Original Tariff No. 9

Information furnished with the filing of rate changes under
52 Pa. Code, Section 53.52

(a) WHEN a public utility files a tariff, revision or supplement effecting changes IN RATES, INCLUDING RATE INCREASES AND RATE DECREASES, AND CHANGES TO the terms and conditions of service rendered or to be rendered, it shall [submit to] file with the Commission [with the tariff, revision or supplement,] statements showing all of the following:

(a)(1) The specific reason for each change.

National Fuel Gas Distribution Corporation's ("NFGDC") PA Division ("National Fuel" or "Company") has provided a Statement of Reasons describing the necessity for the changes proposed within this filing.

(a)(2) The total number of customers served by the public utility.

213,407 total customers served as of September 30th, 2025.

(a)(3) A calculation of the number of customers, by tariff subdivision, whose bills will be affected by the change.

This information is shown in National Fuel Exhibit E – Proof of Revenue.

(a)(4) The effect of the change on the utility's customers.

This information is shown in National Fuel Exhibit E – Proof of Revenue.

(a)(5) The effect, whether direct or indirect, of the proposed change on the utility's revenue and expenses.

The Company's proposal will change revenues and expenses, as shown in National Fuel Exhibit A (FPFTY), Schedule A-1. Individual adjustments to revenues and expenses are described in testimony and exhibits supporting the filing.

(a)(6) The effect of the change on the service rendered by the public utility.

The filing will allow the Company to continue to provide safe and reliable service to its customers while maintaining high levels of customer satisfaction.

(a)(7) A list of factors considered by the utility in its determination to make the change.

The list shall include a comprehensive statement as to why these factors were chosen and the relative importance of each. This subsection does not apply to a portion of the tariff change seeking a general rate increase as defined in 66 Pa.C.S. Section 1308 (relating to voluntary changes in rates).

Not applicable.

(a)(8) Studies undertaken by the public utility in order to draft its proposed change. This paragraph does not apply to a portion of the tariff change seeking a general rate increase as defined in 66 Pa.C.S. Section 1308.

Not applicable.

(a)(9) Customer polls taken and other documents, which indicate customer acceptance and desire for the proposed change.

No customer polls or other documentation regarding customer acceptance or desire for the proposed change exists.

(a)(10) Plans the public utility has for introducing or implementing the change with respect to its customers.

The Company will notify its customers of the proposed increase by means of a billing insert in compliance with the Commission's Regulations as codified at 52 PA Code Section 53.45.

(a)(11) ORDERS or rulings, OR BOTH, applicable to the filing FROM THE FOLLOWING:

(a)(11)(i) THE FEDERAL ENERGY REGULATORY COMMISSION (FERC).
(a)(11)(ii) THE FEDERAL COMMUNICATIONS COMMISSION (FCC).
(a)(11)(iii) THE COMMISSION.
(a)(11)(iv) COURTS OF COMPETENT JURISDICTION.

There are no rulings directly applicable to this change.

(b) When a public utility files a tariff, revision or supplement which will increase or decrease the bills to its customers, it shall file with the Commission in addition to the requirements of subsection (a)[, to the Commission, with the tariff, revision or supplement,] statements showing all of the following:

(b)(1) Specific reason for each change.

The Company has provided a Statement of Reasons describing the necessity of this filing.

(b)(2) Utility's operating income statement ending not more than 120 days prior to filing date – historic year.

Please refer to National Fuel Exhibit A (HTY), Schedule B-2.

(b)(3) Number of customers, by tariff subdivision, whose bills will be increased.

This information is shown in National Fuel Exhibit E – Proof of Revenue.

(b)(4) Total increases, in dollars, by tariff subdivision, projected to an annual basis.

This information is shown in National Fuel Exhibit E – Proof of Revenue.

(b)(5) Number of customers, by tariff subdivision, whose bills will be decreased.

This information is shown in National Fuel Exhibit E – Proof of Revenue.

(b)(6) Total decreases, in dollars, by tariff subdivision, projected to an annual basis.

This information is shown in National Fuel Exhibit E – Proof of Revenue.

(c) If a public utility files a tariff, revision or supplement which it is calculated will increase the bills of a customer or a group of customers by an amount, when projected to an annual basis, exceeding 3% of the operating revenues of the public utility—subsection (b)(4) divided by the operating revenues of the public utility for [a 12-month period as defined in subsection (b)(2)] the HTY—or which it is calculated will increase the bills of 5% or more of the number of customers served by the public utility—subsection (b)(3) divided by subsection (a)(2)—it shall submit to the Commission with the tariff, revision or supplement, in addition to the statements required by subsections (a) and (b), all of the following information:

(c)(1) Rate of return for historic year and anticipated for future year.

Please refer to National Fuel Exhibit A (HTY), Schedule A-1, National Fuel Exhibit A (FTY), Schedule A-1, and National Fuel Exhibit A (FPFTY), Schedule A-1.

(c)(2) Detailed balance sheet at the end of the historic year.

See refer to Regulation Response 53.53 - III-F.1 for a comparative balance sheet of NFGDC at September 30, 2025. The balance sheet provided is for the entirety of NFGDC. Balance sheets are not maintained separately for National Fuel and NFGDC's NY Division ("National Fuel – NY").

(c)(3) Summary, by detailed plant accounts, of book value of property of utility at end of

historic year.

Please refer to National Fuel Exhibit A (HTY), Schedule C-2, for the original cost book value of the property of the utility.

(c)(4) Respective amount of the depreciation reserve applicable to each detailed plant account.

Please refer to National Fuel's Exhibit A (HTY), Schedule C-3, for the depreciation reserve as of September 30, 2025 Exhibit A (FTY), Schedule C-3, for the depreciation reserve as of September 30,2025, and Exhibit A (FPFTY), Schedule C-3, for the depreciation reserve as of October 31, 2025. Please also refer to the depreciation study sponsored by Company witness John J. Spanos in National Fuel Exhibit C.

(c)(5) Statement of operating income, setting forth the operating revenues and expenses by detailed accounts [for the 12-month period ending on the date of the balance sheet required by paragraph (2)] at the END of the HTY.

Please refer to National Fuel Exhibit A (HTY), Schedule B-2, for the historic year operating revenue and expenses.

(c)(6) Description of any major changes in the operating or financial condition of the utility occurring between the [date of the balance sheet required by paragraph (2)] END of the HTY and the date of transmittal of the tariff, revision or supplement. As used in this paragraph, a major change is one which materially alters the operating or financial condition of the public utility [from that] as reflected in paragraphs (1)—(5).

National Fuel has had no major changes in its operating or financial condition from September 30, 2025, through the filing date.

(d) N/A

SECTION 53.53E - FILING REQUIREMENTS

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-A - General
Delivered on January 28, 2026

III-A.1

Request:

Provide a statement indicating that the public utility is subject to the Commission's jurisdiction.

Response:

National Fuel Gas Company's public utility operations in the state of Pennsylvania are carried out by National Fuel Gas Distribution Corporation's Pennsylvania division (the "Company"). The Company is subject to the jurisdiction of the Pennsylvania Public Utility Commission.

Prepared by or under the supervision of: Rebecca E. Hillery

National Fuel Gas Distribution Corporation
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III-A.2

Request:

Provide a statement of the total amount and percentage of the base rate increase being sought for recovery in rates under 66 Pa.C.S. § 1308(d).

Response:

The Company is seeking a filed for revenue requirement increase of $19,680,000 (exclusive of proposed Energy Efficiency rider) which represents a delivery increase of 14.09% and an overall total bill increase of 7.41%.

Prepared by or under the supervision of: Donald N. Koch

National Fuel Gas Distribution Corporation
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III-A.3

Request:

Provide a statement indicating the test year the public utility is using in discharging its burden of proof under 66 Pa.C.S. § 315 (relating to burden of proof).

Response:

The Company will use the Fully Projected Future Test Year (FPFTY) to support the rate proposals contained within this case.

Prepared by or under the supervision of: Rebecca E. Hillery

National Fuel Gas Distribution Corporation
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III-A.4

Request:

To the extent THAT the public utility claims information required by this exhibit is confidential or proprietary, provide a summary statement indicating, with specificity, which Filing Requirement(s) have responses designated to be confidential or proprietary. A claim of confidentiality [shall be] IS subject to review by the presiding officer under § 5.365 (relating to orders to limit availability of proprietary information).

Response:

The following Standard Data Requests, Filing Requirement Responses, and Rate Case Exhibits are designated as confidential or proprietary:

Standard Data Requests: RR-13; RR-24; RR-25: RR-27; RR-55; COS-10, COS-11: ROR-04; ROR-10; and ROR-13.

Filing Requirement Responses: III.C.5; III.D.9; III.I.04; III.I.06; III.J.6; III.L.03; III.M.4; IV.B.3; IV.B.4; IV.B.5; AND IV.B.7

Exhibits: National Fuel Exhibits EMS – 3:5; VLH-1

All provided electronic files (including excel workbooks, models, and workpapers)

Prepared by or under the supervision of: Donald N. Koch

National Fuel Gas Distribution Corporation
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III-A.5

Request:

Provide the following supplemental information when providing the information required by this regulation and in response to each discovery request relative to the current base rate case proceeding, as applicable:

III.A.5.a Provide the data for the HTY and the first year that new rates were in effect from the immediately preceding base rate case if the time periods for the data requested relative to the current base rate case do not include the HTY and first year under new rates from the immediately preceding base rate case.
III.A.5.b Explain the difference in projections and adjustments made for the immediately preceding base rate case as compared to the projections and assumptions made relative to the current base rate case.
III.A.5.c Provide details of any reconciliations and adjustments made relative to the immediately preceding base rate case and explain whether (and how) they would be expected to be rolled into base rates in the current base rate case or whether they are expected to arise relative to rates as may be established in the current base rate case.

Response:

a. Please see III-A.5 Attachment 1 for a summary comparison of the HTY September 30, 2025 ("HTY") relative to TME July 31, 2024, the first full year new rates were in effect from Docket No. R-2022-3035730 ("Last BRC"). Due to TME July 31, 2024 being a time period that crosses fiscal years and ends during a mid-quarter, TME Sept 30, 2024 ("FY 24") is also being provided for a normalized comparison to the HTY.

b. Please refer to the direct testimony of Company witnesses for any specific differences in projections and assumptions made from the Last BRC relative to the current base rate case.

c. Please refer to the direct testimony of Company witnesses for details of any specific reconciliations and adjustments made relative to the the Last BRC relative to the current base rate case.

Prepared by or under the supervision of: Donald N. Koch

III.A.5
Attachment 1

	Rate Year TME 7.31.24	FY 24 TME 9.30.24	HTY TME 9.30.25	Reconciliation/Adjustment Notes
Original Cost of Plant In Service	$787,546	$805,044	$824,511	
Less: Depreciation Reserve	280,705	280,586	292,387	
Net Plant in Service	506,841	524,458	532,124	
Additions:				
Land/Plant Held for Future Use	0	0	0	
Materials & Supplies & Fuel Stocks	6,243	12,225	7,280	
Cash Working Capital	22,696	22,696	5,196	CWC per Last BRC filed for position for Rate Year and FY24
Other	674	1,299	870	
Deductions:				
Accumulated Deferred Income Taxes				
Liberalized Depreciation	79,584	79,974	76,126	
Investment Tax Credit	0	0	0	
Other	0	0	0	
Customer Deposits	5,140	5,160	5,152	
Customer Advances	74	68	0	
Contributions in Aid of Construction	0	0	0	
Other	0	0	0	
RATE BASE	$451,656	$475,476	$464,191	
Operating Revenues	$206,953	$206,322	$239,739	
Operating Expenses				
Operation & Maintenance	141,872	142,953	174,325	Includes Purchased Gas Costs
Annual Depreciation	17,693	17,846	21,641	
Taxes - Other than Income	2,213	2,326	2,185	
State Income Tax - Current	(2,066)	(60)	461	Rate Year contains $24MM Sec 481a adjustment due to adoption of repairs and maintenance methodology
Federal Income Tax - Current	(13,067)	(8,253)	3,338	See above
Deferred Income Taxes	12,286	7,696	(994)	See above
Investment Tax Credit (Net)	0	0	0	
Total Operating Expenses	158,930	162,508	200,956	
INCOME AVAILABLE FOR RETURN	$48,023	$43,814	$38,783	
RATE OF RETURN - OVERALL	10.63%	9.21%	8.35%	

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III-A.6

Request:

Supplement the filing with the most recent information if more recent year-end information becomes available during the course of the current base rate case.

Response:

The Company will supplement the filing to the extent more recent year-end information becomes available during the course of this proceeding.

Prepared by or under the supervision of: Donald N. Koch

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III-A.7

Request:

If a requirement calls for information for an immediately preceding year(s) or immediately following year(s) to a test year, provide information for the 12 consecutive month period conforming to the test year dates (for example, January 1 through December 31 or October 1 through September 30).

Response:

The Company acknowledges that if information is required for a preceding year(s) or immediately following year(s) to a test year, information to be provided is for the 12 consecutive month period conforming to the test year dates.

Prepared by or under the supervision of: Donald N. Koch

National Fuel Gas Distribution Corporation
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III-A.8

Request:

Provide a working electronic copy of filing schedules in Microsoft Excel or similar electronic spreadsheet format with all formulas intact including existing links, for the HTY, the FTY and the FPFTY, that support the proposed revenue requirement, rate structure and cost allocation, including, but not limited to, all schedules provided in response to these Filing Requirements. IF SPREADSHEETS ARE CONFIDENTIAL, THEY MUST BE FILED WITH THE COMMISSION CONFIDENTIALLY AND WILL ONLY BE MADE AVAILABLE TO COMMISSION STAFF, AND OTHER PARTIES WITH EXECUTED NON-DISCLOSURE AGREEMENTS OR UNDER A PROTECTIVE ORDER.

Response:

Working electronic copies of filing schedules, work papers, and Confidential financial models have been submitted to the Secretary of the Commission's electronic Sharepoint site.

Prepared by or under the supervision of: Various Company Witnesses

National Fuel Gas Distribution Corporation
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III-B.1

Request:

SET FORTH THE OVERALL REVENUE EFFECT, IN DOLLARS AND AS A PERCENTAGE OF CURRENT REVENUES, OF THE PROPOSED RATE CHANGE AND PROVIDE A SUMMARY DISCUSSION OF THE PRINCIPAL REASONS FOR THE REQUESTED RATE CHANGE, INCLUDING THE REVENUE REQUIREMENT EFFECT OF THE MAJOR CHANGES DRIVING THE NEED FOR THE REQUESTED RATE CHANGE.

Response:

Please refer to National Fuel Exhibit A FPFTY, Schedule A-1 for overall revenue requirement summary. The Company has provided a Statement of Reasons describing the necessity for the changes proposed within this filing.

Prepared by or under the supervision of: Donald N. Koch

National Fuel Gas Distribution Corporation
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III-B.2

Request:

Identify the specific witnesses for each statement and schedule of revenues, expenses, taxes, cash flow, debt, debt coverage, property, valuation and the like and provide direct testimony supporting each element of the rate increase.

Response:

Please see the Direct Testimony of Rebecca E. Hillery, National Fuel Statement No. 1, for a complete list of witnesses and areas of responsibility. The primary witness for each statement and schedule is identified on the specific document.

Prepared by or under the supervision of: Rebecca E. Hillery

National Fuel Gas Distribution Corporation
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III-B.3

Request:

Provide the following schedules at **present rates**. In each schedule, provide references in the pro forma adjustments column for each adjustment which ties to corresponding supporting schedule detailing and explaining each PRO FORMA adjustment.

III.B.3.a	Income Statement
III.B.3.b	Cash Flow Statement
III.B.3.c	Debt-Service Coverage Ratio schedule
III.B.3.d	Balance Sheet, showing individual columns for the following:
III.B.3.d.i	Actual amounts for each of the 2 years immediately preceding the HTY
III.B.3.d.ii	HTY actual amounts
III.B.3.d.iii	Pro forma adjustments between HTY and FTY, including the adjusted HTY for known and measurable changes between the HTY and FTY
III.B.3.d.iv	FTY claimed amounts
III.B.3.d.v	Pro forma adjustments between FTY and FPFTY, including THE 12-CONSECUTIVE-MONTH PERIOD beginning with the first [full] month that new rates will be in effect after the application of the full suspension period permitted under Section 1308(d) amounts;
III.B.3.d.vi	FPFTY claimed amounts.

Response:

3.a - Please refer to National Fuel Exhibit A, Schedule B-2 for the Income Statement at present rates for each of the three test periods.

3.b - c – The Company does not maintain these items at the PA distribution level. Due to financial system limitations, the Company is precluded from trying to do so at a Pro-Forma level.

3.d.i - See attached Pages 2 and 3 for a comparative balance sheet of National Fuel Gas Distribution Corporation at September 30, 2024 and 2023. The balance sheet provided is for the entirety of National Fuel Gas Distribution Corporation, including both the Pennsylvania and New York Divisions. Balance sheets are not maintained separately for the two divisions.

3.d.ii - See attached Pages 2 and 3 for a comparative balance sheet of National Fuel Gas

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Distribution Corporation at September 30, 2024 and 2023. The balance sheet provided is for the entirety of National Fuel Gas Distribution Corporation, including both the Pennsylvania and New York Divisions. Balance sheets are not maintained separately for the two divisions.

3.d.iii – vi - National Fuel Gas Distribution Corporation does not maintain a separate balance sheet for the Pennsylvania division. All accounting records and financial statements are prepared on a consolidated basis for the entire Distribution Corporation. As a result, jurisdiction-specific balance sheet data for the Future Test Year (FTY) and Fully Projected Future Test Year (FPFTY) is not available.

Prepared by or under the supervision of: Donald Koch, Michael Maggioli, and James Welch

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
BALANCE SHEET

Assets and Other Debits

		September 30, 2023	September 30, 2024	September 30, 2025
	Utility Plant			
101	Utility Plant	$ 2,518,237,610	$ 2,656,876,033	$ 2,812,782,009
106	Completed Construction Not Classified - Gas	-	-	-
107	Construction Work in Progress	41,146,080	50,514,181	49,837,690
		2,559,383,689	2,707,390,213	2,862,619,699
108	Accumulated Provision for Depreciation, Depletion and Amortization - (Cr.)	(1,010,785,071)	(1,045,527,118)	(1,087,601,865)
111	Provision for Depletion - Natural Gas Land	-	-	-
	Total Utility Plant	1,548,598,618	1,661,863,095	1,775,017,835
	Other Property and Investments			
121	Non-Utility Property	1,162,034	1,162,034	1,162,034
122	Accumulated Provision for Depreciation and Amortization - (Cr.)	(19,397)	(19,397)	(19,397)
124	Other Investments	9,756,485	10,663,607	4,132,720
128	Other Special Funds	142,361,457	140,274,933	126,929,282
	Total Other Property and Investments	153,260,579	152,081,177	132,204,638
	Current and Accrued Assets			
131	Cash	3,277,999	3,902,478	6,081,595
132	Interest Special Deposits	-	-	-
135	Working Funds	158,800	158,800	157,600
136	Temporary Cash Investments	13,121,049	7,546,635	8,642,762
141	Notes Receivable	1,670,931	1,560,979	1,316,802
142	Customer Accounts Receivable	67,382,801	39,933,193	38,255,504
143	Other Accounts Receivable	8,492,431	7,588,689	8,192,059
144	Accumulated Provision for Uncollectible Accts. - Cr.	(35,716,313)	(25,615,867)	(16,520,999)
146	Accounts Receivable from Assoc. Companies	6,604,765	6,344,846	9,698,072
154	Plant Materials and Operating Supplies	19,513,631	17,452,238	18,492,413
155	Merchandise	-	-	-
163	Stores Expense Undistributed	411,875	616,906	434,942
164	Gas Stored Underground - Current	32,418,469	34,965,144	33,467,810
165	Prepayments	10,811,583	11,705,871	12,119,197
171	Interest and Dividends Receivable	-	-	-
173	Accrued Utility Revenue	16,621,628	15,521,216	16,218,916
175	Derivative Instrument Assets	265,777	38,188	-
	Total Current and Accrued Assets	145,035,427	121,719,316	136,556,673
	Deferred Debits			
182	Other Regulatory Assets	142,469,195	180,441,558	205,852,856
183	Other Preliminary Survey and Invest.	3,703,196	4,013,333	5,969,477
184	Clearing Accounts	(7,407,368)	(7,942,815)	(8,094,919)
186	Miscellaneous Deferred Debits	(2,107,430)	(2,734,850)	446,736
188	Research, Development & Demonstration Expenditures	2,690,201	3,191,437	1,678,072
189	Loss on Reacquired Debt	3,387,850	2,622,022	1,898,412
190	Accumulated Deferred Income Taxes	-	-	-
191	Unrecovered Purchased Gas Costs	(58,667,817)	(42,290,745)	5,769,456
	Total Deferred Debits	84,067,828	137,299,940	213,520,090
	Total Assets and Other Debits	$ 1,930,962,453	$ 2,072,963,528	$ 2,257,299,235

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
BALANCE SHEET

	Liabilities and Other Credits	September 30, 2023	September 30, 2024	September 30, 2025
	Proprietary Capital			
201	Common Stock Issued	$ 59,170,600	$ 59,170,600	$ 59,170,600
207	Premium on Capital Stock	68,500	68,500	68,500
208	Donations Received from Stockholders	163,687,234	168,377,683	222,509,559
216	Unappropriated Earned Surplus	425,126,579	434,115,972	461,765,336
219	Other Comp Income (Loss)	(8,938,812)	(10,096,681)	(12,749,624)
439	Adjustments to Retained Earn	24,693,289	24,693,289	24,693,289
	Total Proprietary Capital	663,807,390	676,329,364	755,457,661
	Long Term Debt			
223	Advances from Associated Companies	475,000,000	425,000,000	600,000,000
224	Other Long-Term Debt	-	-	-
	Total Long Term Debt	475,000,000	425,000,000	600,000,000
	Current and Accrued Liabilities			
228	Accum. Provision for Injuries & Damages	3,163,097	2,631,858	2,470,478
228	Accum. Provision for Pension and Benefits	(28,899,477)	(24,001,692)	(28,834,363)
229	Accum. Provision for Rate Refunds	370,509	370,509	247,006
230	Asset Retirement Obligations	14,715,247	14,933,097	15,887,152
232	Accounts Payable	33,041,653	39,464,578	39,775,844
233	Notes Payable to Associated Companies	105,300,000	267,300,000	191,700,000
234	Accounts Payable to Associated Companies	28,545,720	31,096,900	28,571,422
235	Customer Deposits	13,044,065	20,166,929	16,435,696
236	Taxes Accrued	(2,752,685)	(26,275,911)	(30,659,857)
237	Interest Accrued	-	-	-
238	Dividends Declared	11,600,000	13,300,000	14,500,000
241	Tax Collections Payable	888,962	(1,688,501)	1,459,434
242	Miscellaneous Current and Accrued Liabilities	19,099,180	21,763,832	25,225,316
244	Derivative Instrument Liabilities	-	8,895	70,993
	Total Current and Accrued Liabilities	198,116,272	359,070,495	276,849,121
	Deferred Credits and Resources			
252	Customer Advances for Construction	874,439	616,723	557,409
253	Other Deferred Credits	8,358,842	6,887,814	9,254,799
254	Deferred FASB 109 Liability	293,210,481	301,336,304	264,073,544
255	Accumulated Deferred Investment Tax Credit	3	3	3
263	Deferred Compensation Plan Liability	-	-	-
		302,443,766	308,840,844	273,885,756
	Accumulated Deferred Income Taxes			
282	Liberalized Depreciation	246,508,263	265,768,622	276,954,917
283	Other	45,086,762	37,954,203	74,151,782
	Total Deferred Credits	291,595,025	303,722,824	351,106,698
	Total Liabilities and Other Credits	$ 1,930,962,453	$ 2,072,963,528	$ 2,257,299,235

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III-B.4

Request:

Provide the following schedules at **proposed rates**. In each schedule, provide references in the pro forma adjustments column for each adjustment which ties to corresponding supporting schedule detailing and explaining each PRO FORMA adjustment.

III.B.4.a	Income Statement
III.B.4.b	Cash Flow Statement
III.B.4.c	Debt-Service Coverage Ratio schedule
III.B.4.d	Balance Sheet, showing individual columns for the following:
III.B.4.d.i	Actual amounts for each of the 2 years immediately preceding the HTY
III.B.4.d.ii	HTY actual amounts
III.B.4.d.iii	Pro forma adjustments between HTY and FTY, including the adjusted HTY for known and measurable changes between the HTY and FTY
III.B.4.d.iv	FTY claimed amounts
III.B.4.d.v	Pro forma adjustments between FTY and FPFTY, including THE 12-CONSECUTIVE-MONTH PERIOD beginning with the first [full] month that new rates will be in effect after the application of the full suspension period permitted under Section 1308(d) amounts;
III.B.4.d.vi	FPFTY claimed amounts.

Response:

3.a - Please refer to National Fuel Exhibit A_FPFTY Schedule A-1 for the Income Statement at proposed rates.

3.b - c – The Company doesn't maintain these items at the PA distribution level. Due to financial system limitations, the Company is precluded from trying to do so at a Pro-Forma level.

3.d.i – ii - See response to Section 53.53-III-B.3.d.i - ii for information requested.

3.d.iii – vi - National Fuel Gas Distribution Corporation does not maintain a separate balance sheet for the Pennsylvania division. All accounting records and financial statements are prepared on a consolidated basis for the entire Distribution Corporation. As a result, jurisdiction-specific balance sheet data is not available at proposed rates.

Prepared by or under the supervision of: Donald Koch, Michael Maggioli, and James Welch

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III-B.5

Request:

Provide a schedule showing the number of customers by BOTH:

III.B.5.a RATE CLASSES whose bills will be increased
III.B.5.b RATE CLASSES whose bills will be decreased.

Response:

This information is shown in National Fuel Exhibit E – Proof of Revenue.

Prepared by or under the supervision of: Courtney T. Mann

National Fuel Gas Distribution Corporation
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III-B.6

Request:

Provide a list of reports, data or statements requested by and submitted to the Commission during the year immediately preceding the HTY through the current date.

Response:

Supplements to Tariff Gas – Pennsylvania P.U.C No. 9
No. 274 – Issued August 30, 2024 – Effective October 1, 2024
Annual TCJA Reconciliation Docket Nos. M-2018-2641242 and R-2018-3000527

No. 275 – Issued September 20, 2024 – Effective October 1, 2024
Change in State Tax Adjustment Surcharge (STAS)

No. 276 – Issued September 30, 2024 – Effective October 1, 2024
OPEB Surcredit Update Docket No. R-2021-3027406

No. 277 – Issued October 31, 2024 – Effective November1, 2024
Quarterly 1307(f) gas cost filing Docket No. R-2024-3045177

No. 278 – Issued December 2, 2024 – Effective January 1, 2025
Rider E filing – Customer Education

No. 279 – Issued December 20, 2024 – Effective January 1, 2025
Initial Distribution System Improvement Charge ("DSIC")

No. 280 – Issued December 2, 2024 – Effective January 1, 2025
1307f Addendum

No. 281 – Issued January 31, 2025 – Effective February 1, 2025
Quarterly 1307(f) gas cost filing Docket No. R-2024-3045177

No. 282 – Issued January 31, 2025 – Effective February 1, 2025
PA Management Audit Implementation Docket No. D-2023-3040107

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No. 283 – Issued March 7, 2025 – Effective April 1, 2025
Supp_No. 282 Suspension No. 9 Docket No. R-2025-3053193

No. 284 – Issued March 21, 2025 – Effective April 1, 2025
Quarterly DSIC Update Filing

No. 285 – Issued April 30, 2025 – Effective May 1, 2025
PGC Quarterly Update Filing Docket No. R-2024-3045177

No. 286 – Issued June 18, 2025 – Effective July 1, 2025
Quarterly DSIC Update Filing

No. 287 – Issued July 31, 2025 – Effective August 1, 2025
1307(f) 2025 8.1.25 Compliance Docket R-2025-3052742

No. 288 – Issued August 22, 2025 – Effective October 1, 2025
Annual TCJA Reconciliation

No. 289 – Issued September 19, 2025 – Effective October 1, 2025
the State Tax Adjustment Surcharge Rate Update

No. 290 – Issued September 19, 2025 – Effective October 1, 2025
Quarterly DSIC Update Filing Docket No. P-2022-3034957

No. 291– Issued September 30, 2025 – Effective October 1, 2025
OPEB Surcredit Update Docket No. R-2021-3027406

Gas Cost Rate
1307(f) 2025 – Annual 1307(f) Prefiling/supporting information at R-2025-3052742

1307(f) 2025 – Annual 1307(f) Testimony, exhibits, tariff supplements and tariff addendums for the computation of PGC rates for the twelve months ended November 30, 2024

Other Data
Annual State Tax Adjustment Surcharge (STA) calculation

CAP Discount Charge Rider F Reconciliation Filing under 66 Pa.C.S.A 1307(f)

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Annual Delta Fund for Research and Development Projects Report pursuant to R-00061493 settlement paragraph 18 A.3

1307(e) Rider E Annual Reconciliation

Annual Depreciation Report

Pennsylvania Pipeline Operator Annual Registration Form

Gas Annual Report to the Pa P.U.C

Quarterly Earnings Reports

Annual Rate Comparison Report in accordance with 66 Pa C.S. section 308.1(b)

Assessment Report, Form GAO-21 in accordance with 66 Pa C.S. section 510(b)

Public Utility Security Planning and Readiness Self-Certification Form

Annual Integrated Resource Planning Report

Unaccounted for Gas Report

Prepared by or under the supervision of: Wanya' D Bruce

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III-B.7

Request:

Provide a statement of past and anticipated changes since the immediately preceding base rate case in major accounting procedures.

Response:

Since the immediately preceding base rate case in 2022, National Fuel Gas Distribution Corporation has not made any significant changes to its accounting procedures, and none are anticipated.

The Company maintains full compliance with all applicable FASB standards, GAAP requirements, and regulatory accounting guidelines. Any minor updates implemented during this period were routine in nature and did not materially affect accounting practices or financial reporting.

Prepared by or under the supervision of: Michael J. Maggioli

National Fuel Gas Distribution Corporation
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III-B.8

Request:

Provide an explanation of differences between the basis or procedure used in allocations of revenues, expenses, depreciation and taxes in the current base rate case and the basis or procedure that was used in the immediately preceding base rate case.

Response:

Please refer to Statement 19 – Direct Testimony of John D. Taylor for further details on the allocations of revenues, expenses, depreciation, and taxes.

Prepared by or under the supervision of: Wanya' D. Bruce

National Fuel Gas Distribution Corporation
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III-B.9

Request:

Identify each major addition to plant or facilities to be placed in service or removed from service DURING THE FTY OR THE FPFTY FOR EACH PROJECT IDENTIFIED IN D.2.A OR D.11.B THAT WILL CHANGE UTILITY PLANT BY MORE THAN 3% OF THE CHANGE IN PLANT IN SERVICE SINCE THE PUBLIC UTILITY'S LAST RATE CASE. The supporting documentation shall indicate the effect of the plant addition or removal from service upon THE PUBLIC UTILITY'S rate base, revenue, expense, tax, income and revenue requirement.

Response:

Utility plant for 12 months ended July 31, 2024 (R-2022-3035730): $781,188,473

3% of the change in utility plant in service: $24,435,654

The Company does not have any major additions/removals in D.2.A or D.11.B that meet these criteria to change plant in service by more than 3%.

Prepared by or under the supervision of: Monika M. Duszenko

National Fuel Gas Distribution Corporation
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III-B.10

Request:

Provide revenues and expenses by the account classifications for the applicable industry's USoA.

Response:

Please refer to National Fuel Exhibit A (HTY), National Fuel Exhibit A (FTY), and National Fuel Exhibit A (FPFTY), Schedule B-3 and Schedule B-4, for the operating revenue and expenses by USoA.

Prepared by or under the supervision of: Donald Koch

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
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III-C.1

Request:

Provide a corporate history including the date of original incorporation and [any] EACH subsequent merger or acquisition.

Response:

National Fuel Gas Distribution Corporation ("NFGDC") is a corporation organized and existing under the laws of the State of New York. Its certificate of incorporation was filed April 11, 1973. NFGDC was qualified to do business in Pennsylvania on December 26, 1973.

NFGDC is a wholly owned subsidiary of National Fuel Gas Company ("NFG"). NFG is a public utility holding company registered with the Federal Energy Regulatory Commission ("FERC") under the Public Utility Holding Company Act of 2005. NFG was organized under the laws of the State of New Jersey on December 8, 1902. Its principal office is located at 6363 Main Street, Williamsville, New York 14221. In addition to its ownership of 100% of the capital stock of NFGDC, NFG owns, directly or indirectly, 100% of the capital stock of the following companies:

Company	Incorporation / Formation
Leidy Hub, Inc.	New York, 1981
National Fuel Gas Supply Corporation	Pennsylvania, 1951
Empire Pipeline, Inc.	New York, 2005
Pennsylvania Gas Holdings Corporation	Pennsylvania, 2018
Seneca Resources Company, LLC	Pennsylvania, 1913
National Fuel Gas Midstream Company, LLC	Pennsylvania, 2008
Highland Field Services, LLC	Pennsylvania, 2014
NFG Midstream Covington, LLC	Pennsylvania, 2009
NFG Midstream Processing, LLC	Pennsylvania, 2009
NFG Midstream Trout Run, LLC	Pennsylvania, 2010
NFG Midstream Tionesta, LLC	Pennsylvania, 2012
NFG Midstream Clermont, LLC	Pennsylvania, 2013
National Fuel Resources, Inc.	New York, 1991

The present responsibilities of NFGDC resulted from a corporate reorganization of NFG and certain of its subsidiaries, effective July 1, 1974. Prior to July 1, 1974, three wholly owned subsidiaries of NFG were engaged in retail distribution of gas service. The subsidiaries were Pennsylvania Gas Company, United Natural Gas Company, and Iroquois Gas Corporation.

As of July 1, 1974, the assets of Pennsylvania Gas Company, United Natural Gas Company and Iroquois Gas Corporation associated with gas distribution and the intrastate transmission of gas were transferred to NFGDC. The assets of those companies associated with the storage, production and interstate transmission of gas were transferred to National Fuel Gas Supply Corporation at the same time. The required regulatory approvals were secured for the corporate reorganization, including a certificate of public convenience, docketed at A.97939, and dated August 17, 1973, issued by Pennsylvania Public Utility Commission ("PAPUC").

Since July 1, 1974, NFGDC has furnished retail gas service to the public within the Commonwealth of Pennsylvania and the state of New York. NFGDC also furnished retail gas service to the public within the state of Ohio until 1986, when it sold its Ohio utility properties. A list of counties, cities and other governmental subdivisions in which such service is provided (including areas outside of Pennsylvania), and total population served, follows this narrative.

Since July 1, 1974, NFGDC has acquired the properties of three companies furnishing retail gas service. On May 22, 1975, the PAPUC at A-99200 issued a certificate of public convenience authorizing, inter alia, the transfer, by sale, by Gasco, Inc. to NFGDC of the transmission and distribution property used by Gasco, Inc. in furnishing retail gas service to the public in the Borough of Karns City and in the Townships of Concord, Fairview, Parker Washington and Venango, Butler County. On February 25, 2977, the PAPUC, at A-99910 issued a certificate of public convenience authorizing, inter alia, the transfer, by sale, by Edward S. Dewey and Laurie T. Dewey Trust t/a Dewey Gas Company to NFGDC, of the transmission and distribution property used by Dewey Gas Company in a portion of the Township of Brady's Bend, Armstrong County. On October 31, 1989, NFGDC acquired certain assets of Mercer Gas Company in a transaction approved by both the PAPUC and the United States Bankruptcy Court for the Western District of Pennsylvania. The PAPUC approved the transfer by order of September 14, 1989, at Docket Nos. T-880494, A-121650 F200, A-121850, A-97939, and P-890378. The bankruptcy court issued its order on October 17, 1989, confirming the sale at Case No. 88-00465E. These actions assured continuation of service to approximately 1,420 customers in Mercer Borough and the Townships of East Lackawannock, Findley and Cool Spring.

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On January 31, 1989, NFGDC sold to T.W. Philips Gas & Oil Co. a portion of its assets associated with gas utility service in Mars and Callery Boroughs, and Adams, Butler, Forward, Oakland, Penn and Summit Townships Butler County, Pennsylvania. A certificate of public convenience, docketed at A-122350, and dated January 12, 1989, was issued by the PAPUC approving the transfer which affected approximately 1,250 residential and commercial customers.

In the matter of application, A-121850 F0014, the PAPUC issued a certificate of public convenience on November 29, 2007, for application of NFGDC to transfer by sale of real estate property located in the City of Warren, Warren County, Pennsylvania to Mr. John D. Anderson. On August 1, 2020, National Fuel Resources, Inc. (“NFR”), which operated an energy marketing business, completed the sale of its commercial and industrial contracts and certain other assets to Marathon Power LLC. A notice of customer transfer dated July 28, 2020, was filed, and docketed at A-125010. This sale, in conjunction with the turn back of NFR’s residential customers to NFGDC, effectively ended NFR’s operations.

On October 20, 2025, National Fuel Gas Company entered into a Securities Purchase Agreement with CenterPoint Energy Resources Corp., pursuant to which National Fuel will acquire all of the issued and outstanding equity interests of Vectren Energy Delivery of Ohio, LLC, a natural gas local distribution company serving the Dayton, Ohio region. The transaction is expected to close in the fourth calendar quarter of 2026.

National Fuel Gas Distribution Corporation has entered into an agreement to acquire North East Heat & Light Co. (NEHL). On October 7, 2025, NFG and NEHL filed a Joint Application with the Commission for NFG to acquire NEHL. This application is currently pending Commission approval. NEHL is a corporation formed under the laws of the Commonwealth of Pennsylvania. NEHL provides natural gas transmission, distribution, and supplier of last resort services, and is subject to the regulatory jurisdiction of the Pennsylvania Public Utility Commission. NEHL is classified as both a "public utility" and a "natural gas distribution company" under Sections 102 and 2202 of the Public Utility Code (66 Pa.C.S. §§ 102, 2202). NEHL serves approximately 2,900 customers, including about 2,600 residential meters, 200 commercial/public building meters, 70 large commercial meters, two industrial customer meters, and six large industrial customer meters. Additionally, NEHL provides transportation service to eight customers. Its service territory covers North East Township and the Borough of North East.

Prepared by or under the supervision of: Wanya' D. Bruce

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III-C.2

Request:

Indicate all counties, cities and other governmental subdivisions in which service is provided (including service areas outside this Commonwealth) and the total number of customers by customer class or billed units in each State and county, estimated if not known.

Response:

Please see the tables below, which list all counties in which service is provided, the total number of customers by county, and billed consumption (MCF). This summary is based on the most recent billing data available for the reporting period.

Pennsylvania:

County	**Total Customers**	**Total Billed Consumption** (MCF)
Armstrong	614	678.6
Butler	2,185	3,649.9
Cameron	1,393	12,799.8
Clarion	4,281	105,592.8
Clearfield	7,897	58,502.2
Crawford	19,261	196,522.3
Elk	11,881	83,011.0
Erie	98,195	441,701.3
Forest	944	3,978.6
Jefferson	7,137	22,021.8
McKean	6,064	228,612.0
Mercer	28,453	403,483.5
Potter	5	2.9
Venango	15,356	102,782.90
Warren	10,391	80,004.20

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New York:

County	**Total Customers**	**Total Billed Consumption** (MCF)
Allegany	11,183	60,304.0
Cattaraugus 1	3,830	21,966.0
Cattaraugus 2	10,631	54,349.9
Chautauqua	45,253	273,719.0
Erie	389,486	1,826,276.4
Genesee	12,057	109,171.5
Livingston	918	2,020.0
Monroe	1,399	3,326.4
Niagara	55,385	826,302.5
Ontario	2,390	3,841.4
Steuben 1	3,123	21,335.1
Steuben 2	3,889	10,796.3
Wyoming	4,881	119,259.5

Prepared by or under the supervision of: Wanya' D Bruce

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III-C.3

Request:

Provide an organizational chart explaining the public utility's corporate relationship to affiliated companies showing the consolidated group structure and indicating whether each affiliated company is a regulated public utility under the Commission's jurisdiction or under the jurisdiction of another STATE public utility commission or both.

Response:

Please see the attached organizational chart on page 2.

Prepared by or under the supervision of: Wanya' D Bruce

National Fuel Gas Distribution Corporation
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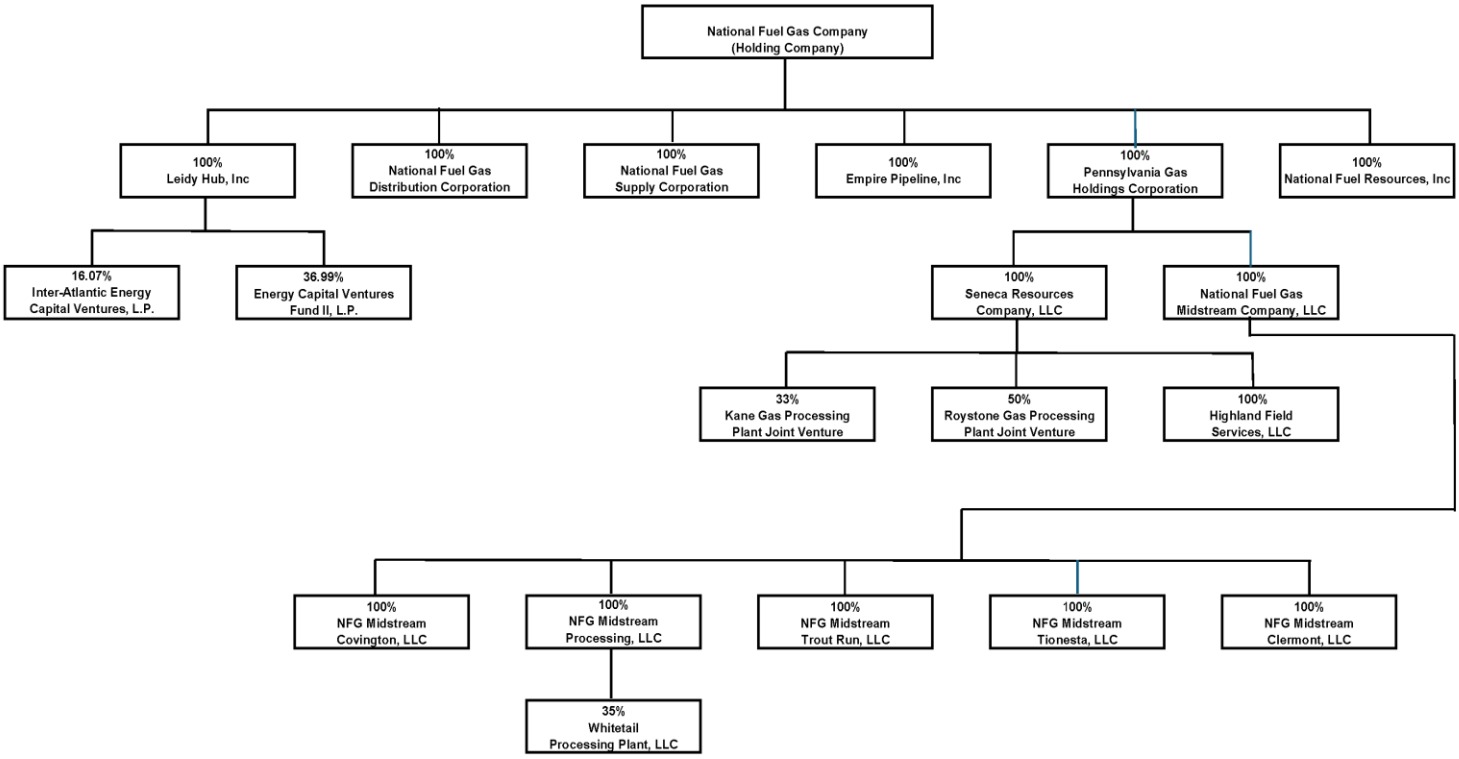
National Fuel Gas Company
Organizational Chart of
Holding Company System
As of March 31, 2025



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III-C.4

Request:

Provide a list and brief description of the two most recent Commission- conducted audits with related docket numbers.

Response:

The two most recent Commission-conducted audits are:

Docket No. D-2024-3049831, which audited National Fuel Gas Distribution Corporation's Purchased Gas Costs for the 12-month periods ended November 30, 2023, November 30, 2022, and November 30, 2021. The report contained no findings or recommendations.

Docket No. D-2024-3049832, which audited National Fuel Gas Distribution Corporation's Low Income Residential Assistance for the 12-month periods ended September 30, 2023, September 30, 2022, and September 30, 2021. The report contained no findings or recommendations.

Prepared by or under the supervision of: Wanya' D Bruce

National Fuel Gas Distribution Corporation
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III-C.5

Request:

Provide a list and brief description of internal audit reports and independent audit reports for the most recent 2-year period.

Response:

Information related to internal audit reports and independent audit reports are CONFIDENTIAL. The Company is providing CONFIDENTIAL Attachment III.C.5 in a separately sealed envelope that is marked "CONFIDENTIAL". The Company hereby requests that the content of such envelope be placed in the Commission's NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such CONFIDENTIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.

Prepared by or under the supervision of: Wanya' D Bruce

National Fuel Gas Distribution Corporation
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III-D.1

Request:

Provide a schedule showing the HTY rate base and rates of return at original cost less accrued depreciation under present rates and under proposed rates. Cross-reference claims made on this schedule to appropriate supporting schedules. Show pro forma adjustments for the FTY and the FPFTY.

Response:

Please refer to National Fuel's Exhibit A (Historic, Future, Fully-Projected) Schedule A-1.

Prepared by or under the supervision of: Monika M. Duszenko

National Fuel Gas Distribution Corporation
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III-D.2

Request:

If a claim is made for CWIP, provide all of the following:

a. An exhibit with a description of each project.
b. A summary of all work orders.
c. Amount expended at the end of the HTY, the FTY, the FPFTY and at the completion of the project.
d. Anticipated in service dates
e. If the project is revenue producing or expense reducing, identify the revenue or expense associated with the project.

Response:

No claim is being made for CWIP.

Prepared by or under the supervision of: Monika M. Duszenko

National Fuel Gas Distribution Corporation
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III-D.3

Request:

If a claim is made for plant held for future use, provide all of the following:

a. A brief description of the plant or land site and its original cost.
b. Expected date of use for each item claimed.
c. Explanation why it is necessary to acquire each item in advance of its date of use.
d. Date when each item was acquired.
e. Date when each item was placed in the plant held for future use account.

Response:

No claim is being made for plant held for future use.

Prepared by or under the supervision of: Monika M. Duszenko

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III-D.4

Request:

If a claim is made for materials and supplies or fuel inventory, provide all of the following:

III.D.4.a A description of the methodology used to value material and supplies.
III.D.4.b The actual 13-month balances of the inventory of materials and supplies for the HTY.
III.D.4.c The 13-month average for materials and supplies as of the end of the HTY.
III.D.4.d The type of fuel, and location, as in station, and the quantity and price claimed FOR NATURAL GAS PUBLIC UTILITIES.

Response:

A. Please refer to III-B-7.
B. Please refer to National Fuel's Exhibit A (Historic), Schedule C-8
C. Please refer to National Fuel's Exhibit A (Historic), Schedule C-8.
D. Please refer to response to IV-B-2 for additional detail around gas deliveries to each customer class for the most recent 24-month period. Please refer to response RR-45 for documentation supporting the Company's claimed balance of gas stored underground.

Prepared by or under the supervision of: Monika M. Duszenko

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III-D.5

Request:

If a claim is made for cash working capital, provide a supporting schedule setting forth the method and data used to determine the cash working capital requirement. Include a lead-lag study of working capital completed no more than 6 months prior to the rate increase filing.

Response:

Please refer to National Fuel's Exhibit A (Historic), Exhibit A (Future) and Exhibit A (Fully Projected), Schedule C-4, and the direct Testimony of Monika M. Duszenko Statement No. 6.

Prepared by or under the supervision of: Monika M. Duszenko

National Fuel Gas Distribution Corporation
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III-D.6

Request:

Indicate if amortized expenses have been removed from the lead-lag study. If so, provide documentation showing the removal. If not, provide a list of such amortization expenses included.

Response:

No expenses have been removed from the lead lag study.

Prepared by or under the supervision of: Monika M. Duszenko

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III-D.7

Request:

In the cash working capital computation, either include sales for resale and related expenses in revenues and in expenses or exclude them from revenues and expenses. Explain procedures followed.

Response:

The Company has no claims for sales for resale.

Prepared by or under the supervision of: Monika M. Duszenko

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III-D.8

Request:

Provide schedules and data in support of all of the following working capital items:

III.D.8.a Prepayments—list and identify all items.
III.D.8.b Federal Excise Tax accrued or prepaid.
III.D.8.c Federal Income Tax accrued or prepaid.
III.D.8.d Pennsylvania State Income Tax accrued or prepaid.
III.D.8.e Pennsylvania Gross Receipts Tax accrued or prepaid.
III.D.8.f Pennsylvania Public Utility Realty Tax accrued or prepaid.
III.D.8.g State sales tax accrued or prepaid.
III.D.8.h Payroll taxes accrued or prepaid.
III.D.8.i Any adjustments related to the previously listed items for ratemaking purposes.

Response:

Refer to Exhibit A, Schedule B-5 (HTY, FTY, FPFTY), Exhibit A, Schedule C-4 (HTY, FTY, FPFTY), Exhibit A, Schedule D-9 (HTY, FTY, FPFTY), and Exhibit No. RR-17. Federal Excise Tax and Gross Receipts Tax are not applicable to the Company.

Prepared by or under the supervision of: Monika M. Duszenko

National Fuel Gas Distribution Corporation
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III-D.9

Request:

Identify fund availability arrangements or terms which the public utility has with its banks with respect to deposits of customer checks.

Response:

Information related to fund availability arrangements is CONFIDENTIAL. The Company is providing CONFIDENTIAL Attachment III.D.9 in a separately sealed envelope that is marked "CONFIDENTIAL". The Company hereby requests that the content of such envelope be placed in the Commission's NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such CONFIDENTIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.

Prepared by or under the supervision of: James C. Welch

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
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III-D.10

Request:

If a claim is made for an additional item in rate base not otherwise addressed in these Filing Requirements, identify such claim and provide a statement, exhibit, or both, explaining in detail the appropriateness of such claim.

Response:

All Rate Base claims have been fully disclosed in National Fuel's Exhibit A (HTY), Exhibit A (FTY) and Exhibit A (FPFTY), Schedules A-1 and C-1 through C-8, as well as the Direct Testimony of Monika M. Duszenko (National Fuel Statement No. 6).

Prepared by or under the supervision of: Monika M. Duszenko

National Fuel Gas Distribution Corporation
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III-D.11

Request:

Provide a schedule that shows a breakdown of plant additions and retirements by plant account for the FTY and the FPFTY, showing all of the following:

III.D.11.a Account number.
III.D.11.b Project number of each addition and each retirement.
III.D.11.c Completion date of each addition and each retirement.
III.D.11.d Description of the addition.
III.D.11.e Addition amount of each addition.
III.D.11.f Description of retirement.
III.D.11.g Retirement amount of each retirement.
III.D.11.h Totals of additions and retirements.

Response:

Please refer to ROR-014 for a breakdown of the capital budget expenditures. Please refer to the direct testimony of Anthony Formato for an explanation of the capital budget process.

Prepared by or under the supervision of: Monika M. Duszenko

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-D-Rate Base
Delivered on January 28, 2026

III-D.12

Request:

Explain how the plant balances for the FTY and the FPFTY were projected. Provide supporting workpapers and documentation.

Response:

Please refer to the direct testimony of Monika M. Duszenko Statement No. 6.

Prepared by or under the supervision of: Monika M. Duszenko

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-D-Rate Base
Delivered on January 28, 2026

III-D.13

Request:

IF THE PUBLIC UTILITY HAS INCLUDED IN RATE BASE A PORTION OF THE COST OF PLANT IN SERVICE THAT IS USED IN PART, BUT NOT EXCLUSIVELY, FOR PENNSYLVANIA JURISDICTIONAL SERVICE, IDENTIFY THE PLANT, INCLUDING THE APPLICABLE PLANT ACCOUNT NUMBERS, PROVIDE THE ESTIMATED PERCENTAGES AND AMOUNTS OF THE ASSETS USED FOR JURISDICTIONAL AND NON-JURISDICTIONAL SERVICE, AND EXPLAIN HOW THOSE PERCENTAGES AND AMOUNTS WERE DETERMINED.

Response:

Please see Attachment III-D.13-I for the Company's Cost Allocation Manual and Attachment III.D.13-II used for miscellaneous cost percentages when assets cannot be specifically attributed to a unit.

Prepared by or under the supervision of: Monika Duszenko

Cost Assignment And Allocation Manual

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INTRODUCTION

A. Purpose

This Cost Assignment and Allocation Manual ("CAAM") was developed to identify the procedures that National Fuel Gas Company, ("NFG") and its affiliates follow in assigning and allocating costs among business units, among regulated services and non-regulated business activities and among jurisdictions.

B. Definitions of Terms and Concepts

Affiliate – within this manual, an affiliate may include a subsidiary or division within a business unit.

Affiliate Transaction – refers to the purchase, trade or lease of a good, service, cost or asset between or among affiliates.

Business Unit – within the PeopleSoft Financial System, a business unit refers to a business entity. The business entity may be a company or division within a company.

Common Cost – a cost incurred by one affiliate that benefits one or more affiliates and the nature of which is more general than costs that are directly assigned or that use a cost causative assignment.

Common Department – a department within the New York Division of NFG Distribution Corporation that has been specifically identified as performing work of a general nature which benefits one or more affiliates and whose costs are allocated based on a general multi-factor formula.

Cost Allocation – a process of assigning costs between and among affiliates based on a pre-determined methodology.

Cost Causative Factors – assignment of costs affecting more than one affiliate based on an identified unit of measure.

Direct Costs - costs that are specifically incurred on behalf of one or more affiliates that require no assignment or allocation factor.

FERC Accounts – the Uniform System of Accounts prescribed for natural gas companies subject to the provisions of the Natural Gas Act, published at Title 18 of the Code of Federal Regulations, Subchapter F, Part 201

Non-Regulated Affiliate – an affiliate that is not a regulated utility or pipeline.

Regulated Affiliate – an affiliate that is regulated by the FERC, NY PSC or PA PUC or any other regulatory body.

C. Acronyms and Abbreviations

FERC – Federal Energy Regulatory Commission

GAAP – Generally Accepted Accounting Principles

NFG – National Fuel Gas Company (Parent Company)

NFGDC – National Fuel Gas Distribution Corporation

NY PSC – New York Public Service Commission

NYD – National Fuel Gas Distribution Corporation – New York Division

PA PUC – Pennsylvania Public Utility Commission

PAD – National Fuel Gas Distribution Corporation – Pennsylvania Division

SEC – United States Securities and Exchange Commission

D. Cost Allocation Philosophy

Cost allocations are premised on the use of a fully distributed cost allocation methodology. A fully distributed cost allocation is based on the concept of distributing all costs to business activities, either through direct charges or allocations, based on a consistent method of determining cost causation from period to period so that reasonable cost attribution occurs. Under a fully distributed cost allocation, all direct and indirect expenses such as labor, materials, and other related expenses are included in the cost of the various business activities performed.

In addition, overhead charges, which include fringe benefits, department overhead, and corporate overhead, are applied to the direct and indirect labor charges captured to arrive at the fully distributed cost for each business activity performed. All resultant cost allocations are predicated on some relevant measure of cost causation for that business activity. This overall approach to cost allocation is followed to the extent it is administratively efficient, i.e., following the procedures does not result in incurring a cost that is uneconomical in relation to the benefits achieved.

For NFG's regulated utility affiliates, transactions with other regulated affiliates and payments of interest to NFG constitute a great majority of total affiliate transactions. For example, for PAD in calendar year 2024, transactions with NYD, transactions with NFG's regulated pipeline subsidiaries, and payments of interest to NFG collectively accounted for approximately 96% of total affiliate transactions. Interest payments by PAD and NYD to NFG are made pursuant to (i) long-term notes issued by NFGDC to NFG in accordance with orders of the PA PUC and NY PSC, and (ii) the corporate money pool agreement, which provides that borrowers of short-term funds from the money pool pay interest to NFG in its capacity as administrator of the money pool.

Given the very high percentage of utility affiliate transactions that involve other regulated affiliates or payments of interest to NFG, NFG has, across all affiliate transactions, generally applied a fully distributed cost allocation methodology. NFG's use of fully distributed costs promotes efficiency in accounting for affiliate transactions and seeks to ensure that all parties to affiliate transactions receive fair treatment.

In consideration of the application of an asymmetric pricing principle to transactions between utility affiliates and non-regulated affiliates, Common Departments will periodically evaluate their services and consider the feasibility of market alternatives. These assessments will review various service aspects, including, for example, service descriptions and associated budgets; cost competitiveness for the services provided; metrics, goals and results related to the provision of service; agreed-upon service level expectations; service level performance in comparison to agreed-upon service levels; and consequences for not meeting service level expectations.

E. Three-Step Approach

The "three-step" allocation process begins with the premise that to the maximum extent practical, all costs that can be specifically attributed to a business unit are directly charged to that business unit. Secondly, indirect costs that cannot be directly charged are allocated to business units on the basis of a causal relationship such as the level of activity within various business units, the level of output for each business unit, or the resources consumed by each business unit. The indirect costs are accumulated into clearing accounts or homogeneous pools and are allocated to various business units on the basis of such causal relationships. In the third step, any remaining costs, which cannot be associated with a specific, identifiable, causal relationship, are pooled and allocated to business units on the basis of "common" factors.

This philosophy avoids cross-subsidization between the regulated entities and the non-regulated business activities of NFG, because using this process ensures that all operations are charged for their appropriate share of costs.

SECTION I. CORPORATE ORGANIZATION

A. Corporate Overview

NFG was incorporated in 1902 under the laws of New Jersey and was established as a registered holding company under the Public Utility Holding Company Act of 1935 ("PUHCA 1935"), with oversight by the Securities and Exchange Commission ("SEC").

On August 8, 2005, the Energy Policy Act of 2005 was signed into law. This repealed PUHCA 1935 and enacted the Public Utility Holding Company Act of 2005 ("PUHCA 2005"), which became effective on February 8, 2006. Responsibility for oversight of public utility holding companies was transferred from the SEC to the Federal Energy Regulatory Commission ("FERC") as a result of the Energy Policy Act of 2005.

NFG owns the following direct subsidiaries:

Subsidiary	Abbreviation	Business Type	Regulator
National Fuel Gas Distribution Corporation	NFGDC	Regulated	NYPSC PAPUC
National Fuel Gas Supply Corporation	NFGSC	Regulated	FERC
Empire Pipeline, Inc	Empire	Regulated	FERC
National Fuel Resources, Inc	NFR	Non-Regulated	
Leidy Hub, Inc	Leidy	Non-Regulated	
Pennsylvania Gas Holdings Corporation	PGHC	Non-Regulated	

PGHC owns the following direct subsidiaries:

Subsidiary	Abbreviation	Business Type	Regulator
Seneca Resources Company, LLC	Seneca	Non-Regulated	
National Fuel Gas Midstream Company, LLC	Midstream	Non-Regulated	

B. Description of System Subsidiaries:

National Fuel Gas Distribution Corporation

National Fuel Gas Distribution Corporation is a regulated natural gas utility that operates in both Western New York and Northwestern Pennsylvania. NFGDC is regulated in the New York jurisdiction by the NY Public Service Commission, while the PA Public Utility Commission regulates the Pennsylvania jurisdiction.

National Fuel Gas Supply Corporation

National Fuel Gas Supply Corporation (NFGSC) provides affiliated and non-affiliated companies with transportation and storage services through the operation of an integrated interstate natural gas pipeline system and underground storage fields. NFGSC is regulated by the Federal Energy Regulatory Commission (FERC).

Empire Pipeline, Inc.

Empire Pipeline, Inc. (Empire) operates a natural gas pipeline and provides affiliated and non-affiliated companies with gas transportation and storage services. Empire is regulated by the Federal Energy Regulatory Commission (FERC).

Seneca Resources Company, LLC

Seneca Resources Company, LLC (Seneca) explores for, develops and produces natural gas in the Appalachian region of the United States. Seneca is a wholly owned subsidiary of Pennsylvania Gas Holdings Corporation, which in turn is a wholly owned subsidiary of NFG.

National Fuel Resources, Inc.

National Fuel Resources, Inc. (NFR) marketed gas to industrial, wholesale, commercial, public authority and residential customers in western and central New York and northwestern Pennsylvania. On August 1, 2020, NFR completed the sale of its commercial and industrial contracts and certain other assets. This sale, in conjunction with the turn back of NFR's residential customers to Distribution Corporation, effectively ended NFR's operations.

National Fuel Gas Midstream Company, LLC

National Fuel Gas Midstream Company, LLC (Midstream) operates natural gas gathering and processing facilities in the Marcellus Shale production region of Pennsylvania. Midstream is a wholly owned subsidiary of Pennsylvania Gas Holdings Corporation which in turn is a wholly owned subsidiary of NFG.

Leidy Hub, Inc.

Leidy Hub, Inc. has limited partnership interests in Inter-Atlantic Energy Capital Ventures, L.P. and Energy Capital Ventures Fund II, L.P., which make capital investments in technology-based businesses focused on the natural gas industry and gas distribution companies as well as the broader energy sector.

SECTION II. AFFILIATE SERVICES

A. Affiliate Services Provided

NFG and its affiliated subsidiaries provide a variety of service amongst and between each other. Some services are directly related to the individual company's line of business, such as providing transportation or gas storage services. Other services take advantage of synergies such as operating employees maintaining closely located facilities of other companies. Additionally, there are administrative and general services, which are performed that benefit some or all of the affiliates. This would be true of Accounting, Human Resources, Audit Services, Finance and Corporate Communications.

REGULATED SERVICES:

Service	Provider	Recipient
Administrative	Distribution, Supply	All affiliates
Finance	Distribution	All affiliates
Human Resources	Distribution	All affiliates
Legal	Distribution, Supply	All affiliates
Gas Distribution	Distribution	3rd Party
Gas Measurement	Distribution, Supply	Distribution, Supply, Empire
Gas Transmission	Supply, Empire	Distribution, 3rd Party
Gas Storage	Supply, Empire	Distribution, Empire, 3rd Party
Gas Transportation	Distribution, Supply, Empire	3rd Party
Gas Gathering	Supply	Seneca
Gas Dispatch	Supply	Distribution, Supply, Empire
Operating & Maintenance	Distribution, Supply	All Affiliates

NON-REGULATED SERVICES:

Service	Provider	Recipient
Gas Gathering	Midstream	Seneca, 3rd Party
Gas Processing	Midstream	Seneca
Office Space rental	NFG Co.	Distribution, Supply, Midstream, Empire

B. Services Provided By NFG Co

DEPARTMENT	DESCRIPTION
Executive	Provide management services for all aspects of the business.
Financing	Provides financing for affiliates through issuance of commercial paper, bank lines of credit and equity. Additionally, monitors corporate credit rating and bank relationships.

C. Services Provided By NFGDC – NYD

DEPARTMENT	DESCRIPTION
Accounting	Provide accounting services to maintain the books and records of the company, provide financial reports and analysis, prepare statutory reports, provide accounting research, set accounting policy, maintain allocations and inter-company billings. Maintain the general ledger (GL) system.
Accounts Payable	Provide non-payroll disbursement processing and analysis including account distribution to the general ledger. Resolve problems associated with invoice processing and maintain the accounts payable system.
Asset Management	Provide services to maintain and manage plant accounting and depreciation for affiliate assets.
Audit Services	Perform audit services for management and the Board of Directors, assist external auditors, provide analysis and safeguard company assets.
Benefit Administration	Provide services to design, implement and administer employee benefit programs.
Budget	Develop and maintain an operating budget, provide management with variance reports and analysis. Provide training and instruction to budget preparers.
Cash Management	Provide services to plan, manage and maintain corporate cash flow, maintain the 'money pool', track miscellaneous billings and cash related items.
Corporate Communications	Provides services related to public and media relations, as well as communicating company information to employees and retirees.
Credit, Collections & Receivables Management	Provide services to maximize customer collections and reduce bad debt write-offs. Additionally, provide credit risk analysis of customers and marketers.
Engineering	Provide engineering service and support functions for pipelines and construction projects.

DEPARTMENT	DESCRIPTION
Executive	Provides management and administrative services related to the overall operation and direction of the affiliates.
Executive – Distribution	Provides management and administrative services related to the overall operation and direction of NFGDC.
Finance - General	Provides services to analyze, maintain and monitor corporate financing activities.
Financial Planning	Provide services to prepare, analyze and maintain the corporate earnings forecast, cash and financing needs.
Government Affairs	Provides services to monitor the political arena and maintain relationships with governmental institutions on a state and federal level.
Human Resources	Provide services to manage and maintain employee compensation policies, recruiting and training programs and worker's compensation and disability programs. Additionally, implement and maintain employee programs and statutory programs.
Information Technology	Provide services to manage, design, develop, implement, monitor and maintain information technologies, application systems, networks, mainframe, software, data security, data recovery and data backup.
Investor Relations	Develop and implement programs to educate and inform potential investors, and communicate information to current investors.
Land	Provide service related to facilities management and land support for operations and construction.
Legal	Provide service related to labor and employment law, litigation, contracts, environmental matters, financial reporting and advice on other legal matters.
Materials Management	Manage and maintain material inventories and material logistics. Additionally, monitor material requirements planning (MRP) activity and project material planning.
Payroll	Provide services related to wage distribution, including the distribution of accounting charges to the GL. Manage withholding liabilities and coordinate filing of statutory reports.
Purchasing	Provide services to procure material, equipment and services, analyze corporate spending and support the materials management function. Provide services to manage and maintain leasing activities and disposition of leased materials.

DEPARTMENT	DESCRIPTION
Rates & Regulatory Affairs	Provide services to manage regulatory activities and relationships for NFGDC. Manage, monitor and implement regulatory programs, provide direct support for customer pricing and billing, and develop sales and load forecasts.
Risk	Provide service related to Risk mitigation, Insurance, Environmental issues and compensation and damage claims.
Safety	Provides services to strengthen our safety culture and promote continuous improvement throughout the organization.
Security	Provide security services for company buildings, structures, work sites and personnel.
Tax	Provide services related to tax filing compliance requirements and perform research and consulting on tax issues.
Telecommunications	Provide services to design, implement, monitor and maintain telecommunication networks throughout the affiliates for voice, data, cellular and satellite communication.
Operating & Maintenance – Distribution	Provides service to operate and maintain lines, including changing charts, servicing valves and meters, and other routine maintenance.
Operating & Maintenance – Transmission	Performs routine maintenance and operating functions on transmission lines of affiliates.

D. Services Provided By NFGDC - PAD

DEPARTMENT	DESCRIPTION
Corporate Communications	Provides services related to public and media relations, as well as communicating company information to employees and retirees.
Engineering	Provide engineering service and support functions for pipelines and construction projects.
Executive – Distribution	Provides management and administrative services related to the overall operation and direction of NFGDC.
Government Affairs	Provides services to monitor the political arena and maintain relationships with governmental institutions on a state and federal level.
Human Resources	Provide services to manage and maintain employee compensation policies, recruiting and training programs

	and worker's compensation and disability programs. Additionally, implement and maintain employee programs and statutory programs.
Land	Provide service related to facilities management and land support for operations and construction.
Legal	Provide service related to labor and employment law, litigation, contracts and advice on other legal matters.
Risk	Provide service related to Risk mitigation, Insurance, Environmental issues and compensation and damage claims.
Safety	Provides services to strengthen our safety culture and promote continuous improvement throughout the organization.
Security	Provide security services for company buildings, structures, work sites and personnel.
Operating & Maintenance – Distribution	Provides service to operate and maintain distribution lines for NYD, including changing charts, servicing valves and meters, and other routine maintenance.
Operating & Maintenance – Gathering	Performs routine maintenance and operating functions on gathering lines of affiliates.
Operating & Maintenance – Transmission	Performs routine maintenance and operating functions on transmission lines of affiliates.

E. Services Provided By NFGSC

DEPARTMENT	DESCRIPTION
Commercial Services	Provides marketing services for pipeline affiliates.
Engineering	Provide engineering service and support functions for pipelines and construction projects.
Executive – Supply	Provides management and administrative services related to the overall operation and direction of NFGSC.
Land	Provide service related to facilities management and land support for operations and construction.
Legal	Provides legal services for NFGSC and Empire.
Regulatory	Provides regulatory services for Empire.
Operating & Maintenance – Distribution	Provides service to operate and maintain distribution lines of affiliates, including changing charts, servicing valves and meters, and other routine maintenance.
Operating & Maintenance – Gathering	Performs routine maintenance and operating functions on gathering lines of affiliates.
Operating & Maintenance – Transmission	Performs routine maintenance and operating functions on transmission lines of Empire.

F. Services Provided By Midstream

SERVICE	DESCRIPTION
Gathering Service	Provides natural gas gathering services for Seneca Resources.
Gas Processing	Provides natural gas processing services for Seneca Resources.

Note: Leidy Hub and NFR do not provide services to the other affiliates at this time. As previously mentioned, the August 1, 2020 sale of NFR's commercial and industrial contracts and certain other assets combined with the turn back of NFR's residential customers to Distribution Corporation has effectively ended NFR's operations.

SECTION III. TRANSACTIONS WITH AFFILIATES

A. Overview

As a diversified energy company with an integrated product and service line, transactions between affiliates take place and must be accounted for properly. Each affiliate must be sure to accurately record the transaction in accordance with the rules and regulations set forth by the various regulatory bodies, SEC and GAAP.

The following are typical transactions between the affiliates.

TRANSACTION	DESCRIPTION
Money Pool	Invest in or borrow funds from the corporate money pool - includes the receipt or payment of interest.
Pay Dividends to Affiliates or NFG Co.	Individual affiliates pay dividends to parent entities.
Purchase Gas Transportation Services	Certain affiliates will purchase gas transportation services from affiliates.
Purchase Gas Storage Service	Certain affiliates will purchase gas storage services from affiliates.
Purchase Gas Gathering Services	Certain affiliates will purchase gas gathering services from affiliates.
Purchase Gas Processing Services	Certain affiliates will purchase gas processing services from affiliates.
Gas Used By Company	Under certain circumstances, provide gas to affiliates to heat or operate facilities.

SECTION IV. ACCOUNTING CHARGE APPLICATION

A. Accounting Charges

National Fuel Gas and most of its affiliates employs a responsibility based accounting charge methodology. This means that every charge is tied back to an individual responsibility center so someone is responsible for the cost. Seneca Resources, being a self-contained entity, employs a system driven by the account number.

Here we will focus on the responsibility-based system used by NFG and the regulated affiliates. In this system, the responsibility center is identified as a department.

Accounting charges are made up of four items – business unit, account number, department ID and product. All four pieces are required for every financial transaction.

In addition, if the charges are related to capital expenditures, a project and activity ID are also needed by the project costing system. The project costing system is used to track and analyze project expenditures, while the general ledger system only records the expenditures going into the appropriate ledger account associated with the project.

1. Business Unit:

The business unit (BU) is a code that indicates which affiliate is associated with the charges. Each affiliate has a unique BU.

Affiliate	BU	Affiliate	BU
National Fuel Gas Co	NFGG1	NFG Midstream – Covington	M01G1
NFG Distribution – NY	DNYG1	NFG Midstream – Processing	M02G1
NFG Distribution – PA	DPAG1	NFG Midstream – Trout Run	M03G1
Empire Pipeline, Inc	EMPG1	NFG Midstream – Tionesta	M06G1
NFG Supply	SUPG1	NFG Midstream - Clermont	M07G1
NFG Midstream Co LLC	MIDG1	NFG Midstream – Wellsboro	M08G1

The Organization Chart in Appendix B will display the structure and most current affiliate listing.

2. Account Number:

NFG's regulated affiliates follow the FERC Chart of Accounts – also known as the Uniform System of Accounts (USoA). The USoA account numbers group the costs at a level of detail that can be used by all utility and pipeline companies and are then comparative from a regulatory standpoint. For our purposes at NFG, we have expanded the chart of accounts to include much more detail to provide us with the ability to budget and analyze our costs in greater detail.

For instance, while the USoA specifies the use of account 816 – Storage Well Expenses, NFG adds another layer of accounts below that to provide detail for analysis of the storage well costs.

FERC	816	Storage Well Expense
NFG	520200	Sonolog Well
	520240	Bail / Swab Well
	520260	Flow Testing
	520390	Storage Well – Water Sampling

NFG's non-regulated affiliates follow a separate chart of accounts that parallels the FERC chart of accounts, but is more in line with their business.

Both the regulated and non-regulated charts of account are available on the Infonet under the E-Docs heading.

3. Department ID:

NFG's PeopleSoft entities use a Department ID to indicate the department or area that is responsible for the charges that were incurred. Each department is unique to a business unit as a control to make sure that costs are charged to the proper affiliate.

For analysis, this provides an audit trail to the source of the charges and is the key to determine the proper department for budgeting purposes.

The Department listing is available on the Infonet under the E-Docs heading.

4. Product:

NFG's PeopleSoft entities use a Product code to classify the type of cost being incurred. It categorizes the costs for analysis purposes.

For instance, while an overall cost might be considered as an Outside Service, the product will classify that Outside Service as an engineering service, legal service, computer consultant or construction contractor.

The product is valuable for budgeting, rate case analysis for the regulated companies and financial statement analysis.

A list of the products is available on the Infonet under the E-Docs heading.

5. Project ID

Project ID is used in NFG's PeopleSoft entities to group and analyze costs related to work being performed on a project. It is used to track the project costs at a detailed level, whereas the general ledger will only keep summarized information. Each project is assigned an individual project id to keep the costs separate.

The detailed information is necessary for the unitization process, which is the process that moves the costs from the in-progress construction phase into a completed asset. It is also used for analysis purposes for project management and capital budgeting.

6. Activity ID

Activity ID goes together with the Project ID and is used in NFG's PeopleSoft entities. It is a code that is the link between the general ledger account number and the project. Each project can only have one activity ID and therefore one account number. Generally speaking, a construction project will be charged to account 107000 – Construction Work in Progress.

SECTION V. COST COLLECTION AND COST ASSIGNMENT

A. Cost Collection

Costs are collected by the various accounting sub-systems and general ledger systems employed by the various affiliates. The majority of the business units use the PeopleSoft general ledger system while Seneca uses the Quorum system. The sub-systems used to collect accounting charges would include Accounts Payable, Accounts Receivable, Payroll, Inventory, Plant Accounting, Asset Management, Customer Information System, Supply Billing System, Empire Billing System, Cash Management and the Local Production System.

Within each system, specific accounts or account and department combinations are applied to transactions to assign the costs to the proper affiliate and financial line item. In most cases, these would be direct charges to O&M expenses or capital expenditures. In other cases, a specific account or groups of accounts are used to gather the costs that are to be allocated.

B. Cost Assignment

Individuals familiar with the various transactions or under the guidance of those individuals perform cost assignment following established guidelines.

The basic guideline for cost assignment can be summarized as follows:

(1) Directly assign as many costs as possible;
(2) Allocate based on cost causative factors; or
(3) Use a general allocation when costs cannot be assigned based on a cost causative factor. Costs related to Common Departments are allocated across the affiliates based on the pre-determined common cost allocation.

1. Direct Charging of Costs

Whenever possible, costs are directly assigned to specific affiliates. This is true for all transactions including labor, inventory, vendor invoices and any others.

A major portion of the directly assigned costs will be labor and labor-related items. For example, when a Supply employee works on a Supply storage well, the costs are charged to an account in the FERC detail range for storage expense with the proper Supply department ID for the storage field where the well is located. If that Supply field person performed work for Distribution, the individual's time will be charged to a FERC account for distribution expense with an associated Distribution department ID which will then generate a loaned and borrowed labor transaction and create a receivable and payable transaction between the two companies.

The same is true for vehicle charges, accounts payable invoices, and inventory transactions. When the costs pertain to a specific affiliate, they should be charged to that affiliate.

2. Indirect Charging of Costs

Where direct charging is not feasible, costs should be assigned to affiliates based on pre-determined or causal factors. There should be solid rationale for the assigning of the costs.

One example of indirect charging would be when paying sales tax and freight on an invoice. If the invoice was paying for the purchase of four items with two going to Supply and two going to DNY, the tax and freight could be charged 50% to each affiliate based on the fact that the material was split 50/50.

Another example would be labor that was used to build a report for use by DNY, Supply, and NFG. In a case where the work is being done and will benefit multiple affiliates, the charges should be split among the affiliates. The question to ask is should it be 1/3 each or is there some other mitigating factor that should be considered. If it is an equal effort, the charges should be split 1/3 each.

A third example of indirect charging is through the use of clearing accounts. In the general ledger, these are a series of accounts used to accumulate costs and then, on a monthly basis and using a causal relationship, the costs are allocated to appropriate business units and/or departments. These accounts are in the 184xxx series.

Assignment of charges should not be based on the budget; rather budgets should reflect the reality of the charges. When possible, documented surveys or studies should be used to back up the decision.

3. General (Common) Allocation

In cases where the department charging the costs is considered a Common Department, the accounting charges will be accumulated and then allocated to affiliates based on the Common Expense Formula. Common charges occur when the costs are generic in nature and benefit all or some of the affiliates. In this case, the charges are allocated based on a formula with multiple factors that attempts to provide a relative weighting that is fair to each affiliate.

As an example, an Accounting department employee working on the consolidated financial statements would need to charge all the affiliates. Unless the work could somehow be divided up by individual affiliate, an overall allocation would be used to spread the costs to each one.

The common cost should be used as a last resort method to apply accounting charges, as it applies a generic methodology to cost assignment. Costs should only be charged to the pool for those expenses that are not directly or indirectly assignable.

4. Convenience or Accommodation Payments

Payments made by one affiliate on behalf of another affiliate are considered convenience or accommodation payments. Not to be confused with actual transactions between affiliates where a good, service or product is provided, convenience or accommodation payments occur when a single payment is made to a vendor that includes amounts for multiple entities.

For example, an invoice from a legal firm is paid by NFG Co. The invoice may have amounts that relate to services provided to NFG Co., Dist-NY, and Supply. The legal service was not provided by NFG Co., but the affiliates would still book an Inter-company payable to NFG Co. and then reimburse NFG Co. for the payment.

While this is convenient, we encourage employees and vendors to identify the individual affiliates and bill them directly.

SECTION VI. LABOR CHARGES

A. Overview

Labor is generally reported to the Payroll Department through the use of a timesheet or entered directly into the Time & Labor system. In some cases, the timesheet is used to report the number of hours worked, the accounting charges, plus any exception time. This would be considered positive time reporting and is mainly used by hourly field personnel. The other method, considered exception reporting, is used mainly to report exception hours, plus any accounting charge exceptions. This is typically used for salaried employees and administrative hourly employees. Labor is reported weekly for hourly employees and monthly for salaried employees.

Within the payroll system, every employee is assigned to a home company and a home department. When time is recorded, the system compares the employee's information to the recorded company and department to determine if the labor is regular labor or loaned and borrowed labor.

Regular labor generates accounting charges within the employee's home company only. The employee's hourly pay rate is multiplied by the hours and applied to the accounting charges that were indicated. In addition, vacation & holiday load is added to the same accounting charges as the labor. If the employee indicated the use of a vehicle, the vehicle & tool load is also applied and charged to follow the labor. Fringe benefits would also be added if required.

Fringe benefits are not added on to regular labor charged to O&M. The fringe benefits related to that labor remains in the home company's fringe benefit expense accounts. Fringe benefits are loaded on to labor that is charged to a capital account, clearing account, inter-company account, and other accounts as specified. (See fringe benefit load chapter for more details).

B. Accounting Charges

Labor can be charged to O&M expense, capital accounts, undistributed accounts, clearing accounts, inter-company accounts or OID or "below the line" accounts for specific costs such as lobbying.

O&M charges are determined based on the type of work being performed. This is especially important for field personnel, as administrative employees will usually charge a more generic A&G account.

Capital work is charged by the use of a project number. Each project number has an associated capital account – CWIP, RWIP or Preliminary Survey based on the nature of the project.

Undistributed accounts are used by a small group of employees performing work that has been specifically identified as requiring special treatment based on regulatory requirements.

Clearing accounts are used by specific departments whose costs are allocated after the costs for the month have been collected.

Inter-company accounts are used when direct charging labor to the non-regulated affiliates not included in the PeopleSoft accounting system. The charges are accumulated and then billed to those companies manually each month.

Other Income and Deduction accounts are used when the charges are not to be included in the cost of service. These would specifically relate to time charged for lobbying by identified employees.

C. Direct Labor

When work is performed relating to a specific task within a specific affiliate, the labor hours and accounting charges should be directly charged. There would be no need for any breakdown or allocation of the charges or costs. This would be considered direct charging of labor.

Direct labor can be charged to any of the accounts indicated in section B.

D. Loaned & Borrowed Labor

When an employee from one affiliate performs work for another affiliate, the time spent is charged to the affiliate for which the work was performed. The charging is accomplished by indicating to payroll that a number of hours in the pay period were worked outside of the employee's home department.

Within the payroll system, the above action triggers the generation of multiple entries to record the loaned and borrowed labor. Included in the entries are: the recording of the inter-company payable and receivable, the recording of the proper accounting charges, and the loading of vacation & holiday and fringe benefits. Additionally, vehicle and tool usage would be applied as required.

SECTION VII. COMMON COST ALLOCATION

A. Background

The Common Cost Allocation is a monthly allocation of "common" administrative and general department costs. The common costs represent costs incurred in New York Distribution departments that have a benefit to the Pennsylvania jurisdiction and/or to other NFG subsidiaries. While some costs may be direct charged to the subsidiaries receiving the benefits, others are more generic in nature and cannot be specifically charged. The common cost allocation seeks to allocate these charges using a three factor formula in a fair manner.

The common cost formula was developed as part of a NYD rate proceeding and has been consistently used in PAD rate proceedings and Supply FERC proceedings. The three factors included in the formula are: Net Plant, O&M expense, and Total Throughput. The formula is updated at the beginning of each fiscal year using the prior year's fiscal results in the computation. The formula will be updated during the fiscal year if there is a significant acquisition or disposition that materially impacts the three factors in the formula. See the attached Common Cost Allocation Summary for a listing of the Departments included in the Common Cost allocation.

B. Application

On a monthly basis, just prior to the O&M close, the allocation is run. The specific Department and Account combinations' charges are gathered and then allocated based on the predetermined allocation percentages. The system generates the appropriate journal entries to book the expense credit in NYD and off-setting receivable from the companies being charged. For PAD, Supply, and Empire Corporation, the system also generates the appropriate expense charges and offsetting payable to NYD. For the non-regulated companies, the system generates a receivable on NYD's books and then a manual bill is prepared for the subsidiaries. The subsidiaries record the charges and remit payment to NYD for services rendered.

The allocation is done in total. Allocations are not generated on individual invoices or separate source transactions. The audit trail is the allocation summary and the various feeder system audit trail reports.

Notes:

The common cost allocation is a last resort type of allocation.

SECTION VIII. OTHER ALLOCATION METHODS

A. Allocation Factors

When costs cannot be directly charged to an affiliate company, an allocation is used to apply the accounting charges. Since many costs are shared between the affiliates, it is important to ensure that the costs are applied fairly.

While the Common Cost Allocation Methodology is used for more of the administrative and general or governance costs, NFG employs various other methods to allocate costs between and among affiliates. These allocations are based on factors that are more causative in nature. The following is a list of the various factors employed:

A	Number of customers	For costs driven by the number of Utility Customers, the ratio of customers between NYD and PAD is used.
B	Number of customer bills	For costs driven by the number of Utility Bills, the ratio of bills between NYD and PAD is used.
C	Ratio of Throughput	For gas supply administration costs between NYD and PAD.
D	Ratio of Transportation Sales	For costs related to transportation activities, the ratio of transportation sales between NYD and PAD will be used.
E	Ratio of Meters – Small	For costs related to the maintenance of small and large meters, the factor is based on the number of meters worked on by state.
F	Ratio of Meters – Large	For costs related to the maintenance of small and large meters, the factor is based on the number of meters worked on by state.
G	Percentage of IS Analyst Time Used	For IS labor costs, time is collected and then a percentage is calculated based on the work performed.
H	Number of Temperature Correctors	For costs related to the maintenance of pressure and temperature correctors, the allocation is based on the percentage of pressure and temperature correctors in the field.
I	Number of Pressure Relief Valves	For costs related to the maintenance of regulators and pressure reliefs, the factor is based on the percentage of regulators and pressure reliefs in the field.
J	Number of Employees	For costs driven by number of employees receiving the services or benefits of the department's activities.

K	Number of Messenger Stops	For messenger service costs, a ratio based on the number of messenger stops is used.
L	Number of Computers	For costs driven by computer connectivity to various systems through the NFG intranet.
M	Number of Telecommunication Basic Licenses	For telecom costs driven by connectivity to the telecom system.
N	Number of Internet connection ports.	For costs driven by computer connectivity to various systems through the NFG intranet.
O	Square footage	For costs driven by the square footage by department at the Main Office making use of the service or equipment, or costs driven by square footage occupied by affiliates at other shared locations.
P	Placement after Training	For costs related to HR rotators during their rotation.
Q	Time study, meter study, invoice analysis and shipper volume schedules for throughput	For gas measurement expense for Supply and Empire.

B. Methodology Application

The following table contains information regarding the current clearing accounts, their home business unit (BU) and the methodology used to allocate the costs:

1. Information Technology:

These are the costs to operate and maintain the Information Technology department and the various computer networks and systems. In the case of account 184150, the costs are related to capital additions and will be charged to capital accounts in the various subsidiaries.

Account	BU	Cost To Be Allocated	Allocation Methodology
184140	DNYG1	Information Technology expenses, which includes labor and benefits.	Costs are allocated based on analyst hours charged to various IT time reporting groups.
184170	DNYG1	Information Technology Network costs, which include labor, benefits, professional service provider (PCI), equipment leases, maintenance agreements, telecommunication costs, utilities and other miscellaneous costs.	Costs are allocated based on a percentage of system connections, including PCs and Tough books.
184150	DNYG1	Information Technology costs primarily related to the roll-out of new computer equipment or software (such as a new firewall) that will be capitalized across the subsidiaries.	Costs are allocated based on a percentage of system connections for each subsidiary.

2. Telecommunications:

These are the various costs of operating and maintaining the Company's telecommunication and data network. Costs include labor, contractor charges, maintenance agreements, leased lines and equipment and various other charges related to providing service.

Account	BU	Cost To Be Allocated	Allocation Methodology
184430	DNYG1	Telecom Costs for Phone Usage & Equipment	Costs are allocated based on a count of all computing devices used for telecom purposes. That is PC hardware (including PC's, laptops tablets, etc.), cellular devices, and desk phones. All device counts were applied to the companies that use them. The totals for each company then determine the new percentage allocation when compared to the overall count.
184435	DNYG1	Telecom - Tie Lines & Wats	Costs are allocated based on a count of all computing devices used for telecom purposes. That is PC hardware (including PC's, laptops tablets, etc.), cellular devices, and desk phones. All device counts were applied to the companies that use them. The totals for each company then determine the new percentage allocation when compared to the overall count.
184445	DNYG1	Telecom - Remote Terminal Usage	Costs are allocated based on a count of all computing devices used for telecom purposes. That is PC hardware (including PC's, laptops tablets, etc.), cellular devices, and desk phones. All device counts were applied to the companies that use them. The totals for each company then determine the new percentage allocation when compared to the overall count.

Account	BU	Cost To Be Allocated	Allocation Methodology
184450	DNYG1	Telecom - Pa Phone Use & Equipment	Costs are allocated based on a count of all computing devices used for telecom purposes. That is PC hardware (including PC's, laptops tablets, etc.), cellular devices, and desk phones. All device counts were applied to the companies that use them. The totals for each company then determine the new percentage allocation when compared to the overall count.
184455	DNYG1	Telecom - MSW	Costs are allocated based on a count of all computing devices used for telecom purposes. That is PC hardware (including PC's, laptops tablets, etc.), cellular devices, and desk phones. All device counts were applied to the companies that use them. The totals for each company then determine the new percentage allocation when compared to the overall count.
184460	DNYG1	Telecom - Erie SC	Costs are allocated based on a count of all computing devices used for telecom purposes. That is PC hardware (including PC's, laptops tablets, etc.), cellular devices, and desk phones. All device counts were applied to the companies that use them. The totals for each company then determine the new percentage allocation when compared to the overall count.

3. Messenger Expense:

These are costs related to the delivery of material and mail between NFG locations.

Account	BU	Cost To Be Allocated	Allocation Methodology
184300	DNYG1	Messenger Expense	Costs are allocated on the basis of number of messenger stops.
184300	DPAG1	Messenger Expense	Costs are allocated on the basis of number of messenger stops.
184300	SUPG1	Messenger Expense	Costs are allocated on the basis of number of messenger stops.

4. Meter Shop:

These are the costs related to maintaining the various meters and metering equipment used by affiliates.

Account	BU	Cost To Be Allocated	Allocation Methodology
184700	DNYG1	Meter Shop expenses – Regulators and Pressure Relief, includes labor, benefits, materials, repair parts	Costs are allocated based on the percentage of regulators and pressure reliefs in the field.
184705	DNYG1	Meter Shop expenses – Temperature corrector, includes labor, benefits, materials, repair parts	Costs are allocated based on the percentage of pressure and temperature connectors in the field.
184707	DNYG1	Meter Shop expenses – general shop / warehousing, includes labor, benefits, materials, repair parts	Costs are allocated based on the average of the percentages of the small and large meter programs plus temperature correction and meter regulators.
184710	DNYG1	Meter Shop expenses – small meter, includes labor, benefits, materials, repair parts	Costs are allocated based on the meters worked on by state in prior 12 months.
184720	DNYG1	Meter Shop expenses – large meter, includes labor, benefits, materials, repair parts	Costs are allocated based on the meters worked on by state in prior 12 months.

5. Miscellaneous Customer Services:

These are costs related to producing and mailing bills to customers.

Account	BU	Cost To Be Allocated	Allocation Methodology
184240	DNYG1	Customer Billing	Costs are allocated based on the ratio of customer bills between NYD & PAD.
184245	DNYG1	Customer Postage	Costs are allocated based on postage usage.

6. Supply Services:

The following are costs related to the movement of gas through the pipeline network.

Account	BU	Cost To Be Allocated	Allocation Methodology
184220	SUPG1	Gas Measurement Expenses, including labor, benefits, and contractor and office expenses.	Costs are allocated based on departmental labor hours. Study performed by department.
184250	SUPG1	Gas Supply Administration, including labor, benefits, and contractor and office expenses.	Costs are allocated based on a rolling three-year average of the throughput of Distribution NY and Distribution PA.
184270	SUPG1	Gas Control including labor, benefits, and contractor and office expenses.	Costs are allocated based on departmental labor hours. Study performed by department.

7. Miscellaneous Services:

These are costs related to the shared use of the mail, print and copy rooms throughout the main office, and also the cost of confidential document destruction.

Account	BU	Cost To Be Allocated	Allocation Methodology
184617	DNYG1	MPC Room Clearing	Costs are allocated based on the number of employees at 6363 Main St
184618	DNYG1	Certified Document Destruction	Costs are allocated based on the number of employees at 6363 Main St

8. Human Resources Management Trainees

These costs are related to the labor, benefits loads, and office supplies for the employees participating in the Management Trainee program. The employees use one home department but work in various departments throughout the company. At the end of the two years, employees are assigned a permanent work location and begin recording expense under that department ID.

Department	BU	Cost To Be Allocated	Allocation Methodology
1457	DNYG1	HR Management Trainees	Costs are allocated based on historical placement of employees upon completion of two-year program

SECTION IX. ALLOCATION OF RENT

A. Main Office Rent

There is one transaction that begins in the non-regulated affiliates that includes costs that are allocated to both regulated and other non-regulated affiliates. The one allocation based transaction is the rent for 6363 Main St.

NFG Co. owns the leasehold for the office building at 6363 Main St. in Williamsville, NY and leases space in the building to Distribution, Supply, Empire, and Midstream. The lease costs are based on an allocation related to the square footage of office space for each entity.

The lease affiliates also allocate the charges to individual departments using the square footage basis, so that the charges can be allocated across affiliates based on the work performed by the individual departments.

For instance: In NFGDC, DNY is allocated rent based on the square footage of space used. DNY then further allocates the cost to each of its departments located in the building. The individual departments then charge or allocate their costs based on the work they perform across the affiliates. So while DNY may be allocated 80% of the lease costs, they may end up with only 55% of the total costs once the allocation cycle is complete.

B. Other Rent

In addition to the Main Office, affiliates of NFG Co. may share other offices, service centers and field locations. Rent is allocated among affiliates that share space based on the square footage occupied by each affiliate.

SECTION X. OVERHEADS

Many transactions between affiliates can be directly measured and priced out based on contracted rates or tariff rates. In these transactions, multiplying a quantity and price results in the cost. Many other transactions, however, involve indirect costs.

For example, when borrowing an employee the cost includes not only the employee's labor rate, but also their fringe benefits, vacation & holiday load, and possibly vehicle charges. Constructing a pipeline results in engineering overhead being added to the costs, and requesting material from a warehouse or stockroom includes an inventory overhead.

These overheads are calculated and reviewed on a regular basis, usually annually, to ensure that the transactions between affiliates are equitable.

A. Employee Benefits

Labor transactions between affiliates are charged not only the actual labor cost, but also an amount for fringe benefits and vacation & holiday load. The purpose of loading the labor with these costs is to ensure that the total cost of labor follows the accounting charges. In addition to labor between affiliates, benefits are also included on all capitalized labor and all labor charged to clearing accounts. From a regulatory standpoint, benefits are not just expensed, but follow all labor.

There are two benefit loads within our employee benefits –Vacation & Holidays and Fringe Benefits:

Vacation & Holidays Load (V&H) is a means of spreading the cost of vacation time and holiday time across the actual work performed by the employee. Employees may spend a majority of their time performing capital work or loaning their labor to another affiliate. By adding the V&H to the labor, the actual employee labor costs directly follow the labor.

V&H is calculated annually and is the cost of vacation and holidays divided by total labor.

Fringe Benefit Load (FB) is the method of burdening the labor costs with the cost of fringe benefits when the labor is not charged to home company O&M expense. The fringe benefits represent the cost of non-labor benefits, such as medical insurance, pension, dental care, post-employment benefits, and life insurance.

Fringe benefits are added to all non-home company O&M labor, including affiliate labor, clearing account labor, capital labor and labor charged below the line. Once again, from a regulatory standpoint, fringe benefits are not just expensed, but follow the labor charges.

Fringe benefit loading is calculated based on the total fringe benefits divided by total labor. (See appendix for a sample fringe benefit and vacation & holiday calculation.)

B. Vehicle & Tools

Vehicle & Tool load (VT) is the method of distributing the costs related to operating and maintaining a fleet of vehicles and construction tools. Direct costs such as lease payments, depreciation, fuel, maintenance and repairs are coupled with indirect costs such as garage costs, fuel tank maintenance and back office expenses to determine a fair hourly rate to charge when the vehicles are used.

Vehicle costs are accumulated in clearing accounts and subsequently cleared using an hourly usage rate. The rates are calculated annually, then reviewed and adjusted throughout the fiscal year as required. The rates are calculated by taking the total cost of the vehicles divided by the number of working hours in the fiscal year. (See appendix for an example of the calculation methodology and sample rate schedule.)

Separate vehicle fleets are kept by Dist-NY, Dist-PA, Supply, and Midstream, and separate rates are determined for each entity. In cases where employees are loaned to an affiliate, the vehicle cost is also loaned using the rates of the employee's home company.

The vehicle usage is recorded through the payroll time reporting system. Employees include the Vehicle ID that they used along with their payroll hours. The system then charges the vehicle to the same accounting charges that were used for the labor. The rate is applied and charged along with other payroll overheads using a transportation product to identify the charges.

Vehicle & Tool Accounts:

Account	Tools - Description	Account	Vehicles - Description
184015	Main Line Trucks	184510	Transport Vehicles for Repair/Maint.
184020	Main Line Trucks - Leased	184515	Transportation Equipment
184025	Excavating Equipment	184520	Auto Compact
184030	Excavating Equipment - Leased	184530	Meter Reading Vehicle
184035	Miscellaneous Equipment	184532	Meter Reading Vehicle - Electric
184038	Other Construction Equipment	184535	Meter Reading Vehicle - Leased
184040	Miscellaneous Equipment - Leased	184540	Auto - Non-Compact
184050	Cranes	184545	Auto - Non-Compact - Leased
184055	Welding Equipment	184550	Trucks - 1/2 & 3/4 Ton
184060	Welding Equipment - Leased	184555	Trucks - 1/2 & 3/4 Ton - Leased
184065	General Construction Equipment	184560	Trucks - 1 Ton and Larger
184070	Construction Equipment - credit	184565	Trucks - 1 Ton and Larger - Leased
		184570	General Transportation Equipment
		184575	Transportation Vehicle - Credit
		184580	Transportation Expense Split
		184585	Vehicle Breakdown

C. Engineering (Unicap)

The Engineering Department provides many services which can be directly and indirectly related to work performed by the operations and construction groups. In cases where an engineer is directly assigned to a large project, their labor and benefit costs can be easily charged to the project. However, when the work being done provides benefits to many projects, it is much more difficult to directly assign the costs. For this reason, an engineering overhead factor is used to allocate a portion of the Engineering Department's costs across all on-going construction projects.

Each Engineering Department accumulates its own A&G costs. On a periodic basis, the department reviews the work being performed by its employees to determine the percentage to be charged to the capital projects. This percentage is then used to apply the Engineering Overhead or Unicap (IRS Sec 263 Uniform Capitalization) amount to the various projects.

The amounts are applied to the projects via an allocation in the PeopleSoft system. First an amount is determined from the department's actual expenses, then that amount is spread across the open projects.

D. Inventory

Inventory overheads are collected in account 163 as directed by the FERC instructions. Inventory and warehousing costs such as labor, rent, utilities and maintenance of the warehouse facilities, as well as freight charges, sales tax, inventory price adjustments and other inventory overheads are accumulated and form the basis for the inventory overhead.

The Inventory Overhead is added to each inventory issue by the PeopleSoft Inventory Module. The item price is multiplied by the number of units issued to determine the inventory issue value. That value is then multiplied by the overhead rate to determine the amount of inventory overhead to add to the transaction. The issue and the overhead are accounted for separately for auditing purposes, but are charged to the same accounting charges. Overhead is added to all inventory transactions whether in the home company or inter-company.

E. AFUDC

AFUDC or Allowance for Funds Used During Construction is a construction overhead related to the cost of borrowed funds or other funds used for utility construction projects. Since the construction costs aren't included in "rate base" during the construction period, the company does not earn a return on such costs. AFUDC can be viewed as a means of making us whole during the construction period.

By official definition, it is a component of the construction of Property, Plant and Equipment ("PP&E") defined in the applicable regulatory system of accounts as

including “the net cost for the period of construction of borrowed funds used for construction purposes and a reasonable rate on other funds when so used.” AFUDC is capitalized in those instances in which the related construction work in progress is not afforded rate base treatment and is reflected in the Statements of Income as a reduction to “Interest expense” and “Other income and expense, net” to the extent it represents borrowed funds and other funds used in construction, respectively.

SECTION XI. ALLOCATION PROCESS

A. Overview

Costs collected during the accounting month are aggregated and allocated as part of the month end closing process. The majority of the allocations are processed automatically through the PeopleSoft allocation module, while the three Information Services allocations are processed using a spreadsheet.

B. Processing

Allocations are performed once a month during the monthly closing process. They can be run once the feeder system journal entries are received and posted, as well as all manual journal entries that contain O&M or clearing accounts.

There is a specific order in which the allocations are run, which is detailed in the monthly processing checklist. The order is important as one allocation may generate charges that are further allocated in a later step. In most cases, the previous allocation must also be posted before continuing.

Once the allocation process is completed, report GL1601 is run to verify the allocations. This report shows the activity or balance in the accounts. If the process ran correctly, the balances in the accounts should be zero.

SECTION XII. BILLING AND PAYMENT

Once the closing cycle is complete and all the affiliate charges are identified, an inter-company billing process takes place to provide an invoice for the affiliates so that payments can be made.

A. Procedures

1. Billing:

Services and shared costs between affiliates are generated throughout the accounting month and accounting close cycle. As near as possible to the end of the monthly closing, the affiliate charges are reconciled and a detailed invoice is prepared. The invoice includes detail and references back to the transactions that generated the entries.

The review and analysis of the costs is managed through the budgetary process. Each department receives reports outlining the costs charged to them on a monthly basis. As many administrative departments within NFGDC and NFGSC perform functions that cross affiliates, the department heads review the detail costs and manage the expenditures. Variances from budget are analyzed and reported during the budget review meetings held monthly.

Additionally, an accountant reviews the inter-company reports and makes sure that the Inter-Company Receivables and Payables reconcile. Two reports are used in this process, GL1650 and GL10610.

2. Payment:

Once the invoice is reviewed and approved for payment by the Controller, monies are wired between affiliates (checks are cut for the smaller amounts).

APPENDICES

Available on InfoNet (https://infonet.natfuel.com/accounting/default.asp)

- Common Expense Documentation
- Fringe Benefit Load Rates
- Current Allocation Rates
- Vacation Holiday Load Rates
- Vehicle & Tool Load Rates

National Fuel Gas - Misc Allocations
Fiscal Year 2026

Account	Acct Description	Product	Alloc Mask	NYD	PAD	Supply	Empire	Midstream	Parent	Seneca	Total
184160	ISD Cyber Security Expense	4400	ITCYB	45.01%	26.09%	24.65%	0.94%	2.46%	0.18%	0.67%	100.00%
184165	IT Security Command Center	4405	ITCOM	30.95%	15.52%	35.09%	5.11%	10.78%	2.21%	0.34%	100.00%
184170	IS PC Expense	3802	N/A	45.01%	26.09%	24.65%	0.94%	2.46%	0.18%	0.67%	100.00%
184220	Gas Measurement Expense	3901	GM			89.00%	11.00%				100.00%
184240	Customer Billing Clearing	2932	CB	71.77%	28.23%						100.00%
184250	Contract Administration - Supply	4303	GSA	67.37%	32.63%						100.00%
184270	Gas Control Clearing	4201	TSS	9.00%	8.00%	62.00%	12.00%	9.00%			100.00%
184350	Capital Tool Repair Clearing	1285	CTR	48.72%	42.08%	9.14%	0.06%				100.00%
184445	Remote Terminal Usage	3804	TERM	54.42%	21.18%	23.23%		1.17%			100.00%
184700	Meter Shop Clearing - Regulator Work	2933	MS	52.61%	34.11%	11.20%	1.04%	1.04%			100.00%
184705	Meter Shop Clearing - Temperature Corrector Work	2933	MS	50.54%	30.40%	17.22%	0.37%	1.47%			100.00%
184707	Meter Shop Clearing - General Shop Work / Warehousing	2933	MS	59.23%	31.65%	8.14%	0.35%	0.63%			100.00%
184710	Small Meter Expense Clearing	2933	MS	71.85%	27.09%	1.06%					100.00%
184720	Large Meter Expense Clearing	2933	MS	61.92%	34.98%	3.10%	0.00%	0.00%			100.00%
	Dept 1457 - Rotating MBA's		RT	60.00%		40.00%					100.00%
	Dept 4457 - Rotating MBA's		RT		40.00%	60.00%					100.00%

updated for FY2026

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-D-Rate Base
Delivered on January 28, 2026

III-D.14

Request:

IF THE PUBLIC UTILITY FURNISHES MORE THAN ONE TYPE OF PENNSYLVANIA JURISDICTIONAL SERVICE AND HAS INCLUDED IN RATE BASE PLANT IN SERVICE THAT IS USED FOR MORE THAN ONE TYPE OF SERVICE, IDENTIFY THE PLANT, INCLUDING THE APPLICABLE PLANT ACCOUNT NUMBERS, AND PROVIDE THE ESTIMATED PERCENTAGES AND AMOUNTS OF THE ASSETS USED FOR EACH TYPE OF JURISDICTIONAL SERVICE.

Response:

The Company has not included rate base that is used for more than one type of Pennsylvania jurisdictional service.

Prepared by or under the supervision of: Monika M. Duszenko

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-D-Rate Base
Delivered on January 28, 2026

III-D.15

Request:

Provide all workpapers and supporting documentation showing the derivation of the projected balances for the FTY and the FPFTY of each of the following:

III.D.15.a Contributions in aid of construction.
III.D.15.b Customer and developer advances for construction
III.D.15.c Customer deposits.

Response:

15.a. and b. The Company is not making any claims for projected balances.

15.c. Please refer to the direct testimony of Monika M. Duszenko.

Prepared by or under the supervision of: Monika M. Duszenko

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-D-Rate Base
Delivered on January 28, 2026

III-D.16

Request:

Provide schedules supporting claimed amounts for plant in service by function and by account for the HTY, the FTY and the FPFTY.

Response:

Please refer to National Fuel's Exhibit A (Historic), Exhibit A (Future) and Exhibit A (Fully Projected), Schedule C for plant balances.

Prepared by or under the supervision of: Monika M. Duszenko

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-D-Rate Base
Delivered on January 28, 2026

III-D.17

Request:

Provide supporting schedules which indicate the procedures and calculations employed to develop the original cost OF plant and applicable ACCUMULATED DEPRECIATION INCLUDED IN THE PUBLIC UTILITY'S CLAIMED RATE BASE FOR the HTY, the FTY and the FPFTY as APPLICABLE

Response:

The attached schedules set forth the bring forward of the original cost for the historic test year (September 30, 2025), future test year (September 30, 2026), and fully projected future test year (October 31, 2027). The attached schedule III.D.17 – Attachment 4 Reserve Bringforward.pdf set forth the development of the book reserve as of the historic test year (September 30, 2025). The schedules for the development of the book reserve for the future test year and fully projected test year are included in Exhibit C-Future and Exhibit C-Fully Projected, respectively.

Prepared by or under the supervision of: John C. Spanos

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

BRINGFORWARD TO SEPTEMBER 30, 2025 OF THE ORIGINAL COST AS OF SEPTEMBER 30, 2024

	DEPRECIABLE GROUP	ORIGINAL COST AS OF SEPTEMBER 30, 2024	ADDITIONS	RETIREMENTS	TRANSFERS/ ADJUSTMETNS
	(1)	(2)	(3)	(4)	(5)
DEPRECIABLE PLANT					
303	MISCELLANEOUS INTANGIBLE PLANT	24,323,011.20	164,935.18		
PRODUCTION PLANT					
325.4	RIGHTS OF WAY	49,880.62			
328	MEASURING AND REGULATING STATION STRUCTURES	10,095.84			
329	OTHER STRUCTURES	2,650.00			
332	FIELD LINES	444,586.00			
334	MEASURING AND REGULATING STATION EQUIPMENT	3,028,493.10	290,508.40	44,208.29	
TOTAL PRODUCTION PLANT		**3,535,705.56**	**290,508.40**	**44,208.29**	**0.00**
TRANSMISSION PLANT					
365.2	RIGHTS OF WAY	2,318,603.83	135,002.88		
366.2	MEASURING AND REGULATING STATION STRUCTURES	213,539.01	2,184.33		
366.3	OTHER STRUCTURES	3,811.68			
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	60,524,856.55	2,310,742.03	279,278.11	
367.2	MAINS - CATHODIC PROTECTION	3,673,487.57	117,189.83	5,338.46	
369	MEASURING AND REGULATING STATION EQUIPMENT				
	1980 AND PRIOR	295,822.38		5,622.62	
	1981 AND SUBSEQUENT	6,874,063.62	379,599.25	13,962.06	
	TOTAL ACCOUNT 369	7,169,886.00	379,599.25	19,584.68	0.00
TOTAL TRANSMISSION PLANT		**73,904,184.64**	**2,944,718.32**	**304,201.25**	**0.00**
DISTRIBUTION PLANT					
374.2	RIGHTS OF WAY	13,849,069.49	1,246,678.48	977.56	
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	10,917,010.92	416,402.82	49,528.26	172,846.55
375.4	STRUCTURES AND IMPROVEMENTS - SMALL	945,556.48	5,089.81	5,757.01	(129,116.56)
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	351,763,558.21	27,270,348.56	2,008,866.49	
376.2	MAINS - CATHODIC PROTECTION	2,433,262.43	74,670.40		
378	MEASURING AND REGULATING STATION EQUIPMENT	9,242,679.00	1,578,647.11	399,560.13	
380	SERVICES	210,328,378.04	8,574,927.32	2,325,865.35	
381	METERS	14,556,942.76	2,423,573.53	143,009.40	
382	METER INSTALLATIONS	3,334,008.02	39,915.00	50,243.67	
384	HOUSE REGULATOR INSTALLATIONS	1,145,736.46	23,100.00	9,810.86	
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	16,246,734.61	1,571,037.31	63,848.80	
TOTAL DISTRIBUTION PLANT		**634,762,936.42**	**43,224,390.34**	**5,057,467.53**	**43,729.99**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

BRINGFORWARD TO SEPTEMBER 30, 2025 OF THE ORIGINAL COST AS OF SEPTEMBER 30, 2024

	DEPRECIABLE GROUP	ORIGINAL COST AS OF SEPTEMBER 30, 2024	ADDITIONS	RETIREMENTS	TRANSFERS/ ADJUSTMETNS
	(1)	(2)	(3)	(4)	(5)
GENERAL PLANT					
390.11	OTHER SMALL STRUCTURES	108,080.48	1,304,025.81		
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	267,456.09			
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	218,003.15			
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	5,260,904.88	2,211,955.35		
392	TRANSPORTATION EQUIPMENT	12,634,687.75	2,053,131.96	1,285,474.45	
394	TOOLS, SHOP AND GARAGE EQUIPMENT	7,238,135.74	1,188,459.98		
396	POWER OPERATED EQUIPMENT AND TOOLS	8,187,767.65	3,455,368.17	1,672,381.30	
397	COMMUNICATION EQUIPMENT	3,315,241.99	1,081,712.46		
TOTAL GENERAL PLANT		**37,230,277.73**	**11,294,653.73**	**2,957,855.75**	**0.00**
TOTAL DEPRECIABLE GAS PLANT		**773,756,115.55**	**57,919,205.97**	**8,363,732.82**	**43,729.99**
NONDEPRECIABLE PLANT					
	INTANGIBLE PLANT	123,845.54			
	PRODUCTION PLANT	2,840.80			
	TRANSMISSION PLANT	17,652.36			
	DISTRIBUTION PLANT	959,494.75		830.83	
	GENERAL PLANT	51,798.54	403.14		
TOTAL NONDEPRECIABLE PLANT		**1,155,631.99**	**403.14**	**830.83**	**0.00**
TOTAL GAS PLANT		**774,911,747.54**	**57,919,609.11**	**8,364,563.65**	**43,729.99**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

BRINGFORWARD TO SEPTEMBER 30, 2026 OF THE ORIGINAL COST AS OF SEPTEMBER 30, 2025

	DEPRECIABLE GROUP	ORIGINAL COST AS OF SEPTEMBER 30, 2025	ADDITIONS	RETIREMENTS	TRANSFERS/ ADJUSTMETNS
	(1)	(2)	(3)	(4)	(5)
DEPRECIABLE PLANT					
303	MISCELLANEOUS INTANGIBLE PLANT	24,487,946.38			
PRODUCTION PLANT					
325.4	RIGHTS OF WAY	49,880.62	6,175.80	1,049.89	
328	MEASURING AND REGULATING STATION STRUCTURES	10,095.84	1,182.60	201.04	
329	OTHER STRUCTURES	2,650.00	306.60	52.12	
332	FIELD LINES	444,586.00	52,034.40	8,845.85	
334	MEASURING AND REGULATING STATION EQUIPMENT	3,274,793.21	378,300.60	64,311.10	
TOTAL PRODUCTION PLANT		**3,782,005.67**	**438,000.00**	**74,460.00**	**0.00**
TRANSMISSION PLANT					
365.2	RIGHTS OF WAY	2,453,606.71	404,837.88	16,193.52	
366.2	MEASURING AND REGULATING STATION STRUCTURES	215,723.34	37,043.99	1,481.76	
366.3	OTHER STRUCTURES	3,811.68	1,323.00	52.92	
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	62,556,320.47	10,349,561.27	413,982.58	
367.2	MAINS - CATHODIC PROTECTION	3,785,338.94	1,149,951.25	45,998.06	
369	MEASURING AND REGULATING STATION EQUIPMENT				
	1980 AND PRIOR	290,199.76		30,831.19	
	1981 AND SUBSEQUENT	7,239,700.81	1,284,632.61	20,554.13	
	TOTAL ACCOUNT 369	7,529,900.57	1,284,632.61	51,385.32	0.00
TOTAL TRANSMISSION PLANT		**76,544,701.71**	**13,227,350.00**	**529,094.16**	**0.00**
DISTRIBUTION PLANT					
374.2	RIGHTS OF WAY	15,094,770.41	997,180.71	68,805.48	
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	11,456,732.03	209,229.88	14,436.86	
375.4	STRUCTURES AND IMPROVEMENTS - SMALL	815,772.72	609,882.85	42,081.92	
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	377,025,040.28	24,794,809.33	1,710,842.00	
376.2	MAINS - CATHODIC PROTECTION	2,507,932.83	250,452.62	17,281.23	
378	MEASURING AND REGULATING STATION EQUIPMENT	10,421,765.98	694,465.14	47,918.10	
380	SERVICES	216,577,440.01	14,508,089.00	1,001,058.23	
381	METERS	16,837,506.89	966,018.81	66,655.30	
382	METER INSTALLATIONS	3,323,679.35	222,584.98	15,358.37	
384	HOUSE REGULATOR INSTALLATIONS	1,159,025.60	75,678.89	5,221.84	
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	17,753,923.12	1,126,280.00	77,713.33	
TOTAL DISTRIBUTION PLANT		**672,973,589.22**	**44,454,672.21**	**3,067,372.66**	**0.00**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

BRINGFORWARD TO SEPTEMBER 30, 2026 OF THE ORIGINAL COST AS OF SEPTEMBER 30, 2025

	DEPRECIABLE GROUP	ORIGINAL COST AS OF SEPTEMBER 30, 2025	ADDITIONS	RETIREMENTS	TRANSFERS/ ADJUSTMETNS
	(1)	(2)	(3)	(4)	(5)
GENERAL PLANT					
390.11	OTHER SMALL STRUCTURES	1,412,106.29	25,116.34	9,182.05	
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	267,456.09	61,283.88		
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	218,003.15	50,232.69	23,262.00	
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	7,472,860.23	1,571,278.39	1,303,391.00	
392	TRANSPORTATION EQUIPMENT	13,402,345.26	3,096,342.70	1,138,605.79	
394	TOOLS, SHOP AND GARAGE EQUIPMENT	8,426,595.72	1,946,014.22	75,426.00	
396	POWER OPERATED EQUIPMENT AND TOOLS	9,970,754.52	2,302,666.28	847,072.58	
397	COMMUNICATION EQUIPMENT	4,396,954.45	981,546.66	1,043,458.00	
TOTAL GENERAL PLANT		**45,567,075.71**	**10,034,481.16**	**4,440,397.42**	**0.00**
TOTAL DEPRECIABLE GAS PLANT		**823,355,318.69**	**68,154,503.36**	**8,111,324.24**	**0.00**
NONDEPRECIABLE PLANT					
INTANGIBLE PLANT		123,845.54			
PRODUCTION PLANT		2,840.80			
TRANSMISSION PLANT		17,652.36	2,646.00	105.84	
DISTRIBUTION PLANT		958,663.92	62,323.79	4,300.34	
GENERAL PLANT		52,201.68	12,055.84	4,400.58	
TOTAL NONDEPRECIABLE PLANT		**1,155,204.30**	**77,025.64**	**8,806.76**	**0.00**
TOTAL GAS PLANT		**824,510,522.99**	**68,231,529.00**	**8,120,131.00**	**0.00**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

BRINGFORWARD TO OCTOBER 31, 2027 OF THE ORIGINAL COST AS OF SEPTEMBER 30, 2026

	DEPRECIABLE GROUP	ORIGINAL COST AS OF SEPTEMBER 30, 2026	ADDITIONS	RETIREMENTS	TRANSFERS/ ADJUSTMETNS
	(1)	(2)	(3)	(4)	(5)
DEPRECIABLE PLANT					
303	MISCELLANEOUS INTANGIBLE PLANT	24,487,946.38			
PRODUCTION PLANT					
325.4	RIGHTS OF WAY	55,006.53	6,452.47	1,138.52	
328	MEASURING AND REGULATING STATION STRUCTURES	11,077.40	1,235.58	218.01	
329	OTHER STRUCTURES	2,904.48	320.34	56.52	
332	FIELD LINES	487,774.55	54,365.51	9,592.62	
334	MEASURING AND REGULATING STATION EQUIPMENT	3,588,782.71	395,248.22	69,740.27	
TOTAL PRODUCTION PLANT		**4,145,545.67**	**457,622.12**	**80,745.94**	**0.00**
TRANSMISSION PLANT					
365.2	RIGHTS OF WAY	2,842,251.07	543,479.61	22,925.49	
366.2	MEASURING AND REGULATING STATION STRUCTURES	251,285.57	49,730.16	2,097.76	
366.3	OTHER STRUCTURES	5,081.76	1,776.08	74.92	
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	72,491,899.16	13,893,896.41	586,083.36	
367.2	MAINS - CATHODIC PROTECTION	4,889,292.14	1,543,766.27	65,120.37	
369	MEASURING AND REGULATING STATION EQUIPMENT				
	1980 AND PRIOR	259,368.57		43,648.33	
	1981 AND SUBSEQUENT	8,503,779.29	1,724,570.92	29,098.89	
	TOTAL ACCOUNT 369	8,763,147.86	1,724,570.92	72,747.22	0.00
TOTAL TRANSMISSION PLANT		**89,242,957.55**	**17,757,219.45**	**749,049.12**	**0.00**
DISTRIBUTION PLANT					
374.2	RIGHTS OF WAY	16,023,145.64	1,149,531.23	81,962.79	
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	11,651,525.05	241,196.28	17,197.55	
375.4	STRUCTURES AND IMPROVEMENTS - SMALL	1,383,573.65	703,061.51	50,129.03	
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	400,109,007.61	28,582,991.36	2,037,997.37	
376.2	MAINS - CATHODIC PROTECTION	2,741,104.22	288,717.08	20,585.83	
378	MEASURING AND REGULATING STATION EQUIPMENT	11,068,313.02	800,566.39	57,081.23	
380	SERVICES	230,084,470.78	16,724,653.01	1,192,485.36	
381	METERS	17,736,870.40	1,113,608.38	79,401.45	
382	METER INSTALLATIONS	3,530,905.96	256,591.79	18,295.26	
384	HOUSE REGULATOR INSTALLATIONS	1,229,482.65	87,241.21	6,220.39	
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	18,802,489.79	1,298,354.47	92,574.04	
TOTAL DISTRIBUTION PLANT		**714,360,888.77**	**51,246,512.71**	**3,653,930.30**	**0.00**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

BRINGFORWARD TO OCTOBER 31, 2027 OF THE ORIGINAL COST AS OF SEPTEMBER 30, 2026

	DEPRECIABLE GROUP	ORIGINAL COST AS OF SEPTEMBER 30, 2026	ADDITIONS	RETIREMENTS	TRANSFERS/ ADJUSTMETNS
	(1)	(2)	(3)	(4)	(5)
GENERAL PLANT					
390.11	OTHER SMALL STRUCTURES	1,428,040.58	24,994.25	9,438.06	
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	328,739.97	60,985.97		
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	244,973.84	49,988.50		
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	7,740,747.62	1,563,640.27		
392	TRANSPORTATION EQUIPMENT	15,360,082.17	3,081,291.11	1,170,351.26	
394	TOOLS, SHOP AND GARAGE EQUIPMENT	10,297,183.94	1,936,554.47	65,640.00	
396	POWER OPERATED EQUIPMENT AND TOOLS	11,426,348.22	2,291,472.82	870,689.81	
397	COMMUNICATION EQUIPMENT	4,335,043.11	976,775.28	309,457.00	
TOTAL GENERAL PLANT		**51,161,159.45**	**9,985,702.67**	**2,425,576.13**	**0.00**
TOTAL DEPRECIABLE GAS PLANT		**883,398,497.81**	**79,447,056.95**	**6,909,301.49**	**0.00**
NONDEPRECIABLE PLANT					
INTANGIBLE PLANT		123,845.54			
PRODUCTION PLANT		2,840.80			
TRANSMISSION PLANT		20,192.52	3,552.15	149.84	
DISTRIBUTION PLANT		1,016,687.37	71,845.70	5,122.67	
GENERAL PLANT		59,856.94	11,997.24	4,523.27	
TOTAL NONDEPRECIABLE PLANT		**1,223,423.18**	**87,395.09**	**9,795.78**	**0.00**
TOTAL GAS PLANT		**884,621,920.99**	**79,534,452.04**	**6,919,097.27**	**0.00**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 2. BRINGFORWARD TO SEPTEMBER 30, 2025 OF THE BOOK RESERVE AS OF SEPTEMBER 30, 2024

	ACCOUNT	BOOK RESERVE AS OF SEPTEMBER 30, 2024	+	ANNUAL ACCRUALS	-	RETIREMENTS	+	AMORTIZATION OF NET SALVAGE	+	GROSS SALVAGE	-	COST OF REMOVAL	+	MISCELLANEOUS DEBITS AND CREDITS	=	BOOK RESERVE AS OF SEPTEMBER 30, 2025
	(1)	(2)		(3)		(4)		(5)		(6)		(7)		(8)		(9)
303	MISCELLANEOUS INTANGIBLE PLANT	18,801,514		2,146,528										(1)		20,948,041
325.4	RIGHTS OF WAY	36,002		416												36,418
328	MEASURING AND REGULATING STATION STRUCTURES	9,935		22												9,957
329	OTHER STRUCTURES	1,317		67												1,384
332	FIELD LINES	157,691		11,804				908						(908)		169,496
334	MEASURING AND REGULATING STATION EQUIPMENT	1,676,120		82,597		44,208		3,565				8,333		(3,565)		1,706,176
365.1	LAND	0														-
365.2	RIGHTS OF WAY	636,657		29,024										(1)		665,680
366.2	MEASURING AND REGULATING STATION STRUCTURES	111,981		4,232				241						(241)		116,213
366.3	OTHER STRUCTURES	3,637														3,637
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	19,221,430		1,047,125		279,278		95,383				122,103		(102,243)		19,860,314
367.2	MAINS - CATHODIC PROTECTION	2,095,400		114,151		5,338		435						6,425		2,211,073
369	MEASURING AND REGULATING STATION EQUIPMENT	4,261,639		153,017		19,585		9,375				10,377		(9,375)		4,384,695
374.1	LAND	24,801				831		3,658				2,974		(3,658)		20,997
374.2	RIGHTS OF WAY	3,089,067		188,648		978		91				1,597		(91)		3,275,141
375	STRUCTURES AND IMPROVEMENTS	5,833,540		451,709		55,285		76,136				45,561		(76,136)		6,184,403
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	105,494,908		7,306,470		2,008,866		988,449				1,165,857		(951,080)		109,664,023
376.2	MAINS - CATHODIC PROTECTION	1,610,612		111,549				574						(37,943)		1,684,792
378	MEASURING AND REGULATING STATION EQUIPMENT	4,098,370		371,833		399,560		61,576				99,189		(61,576)		3,971,454
380	SERVICES	82,021,910		4,711,374		2,325,865		396,948				523,729		(396,949)		83,883,689
381	METERS	5,896,890		412,897		143,009										6,166,777
382	METER INSTALLATIONS	1,889,449		49,487		50,244										1,888,692
384	HOUSE REGULATOR INSTALLATIONS	581,114		18,950		9,811										590,253
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	6,978,099		311,361		63,849		19,161				26,737		(19,161)		7,198,874
389.1	LAND	(16,289)														(16,289)
390.11	OTHER SMALL STRUCTURES	25,714		4,478				170						(170)		30,192
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	117,163		42,957										(31,231)		128,890
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	213,836		78,401										(74,233)		218,003
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	2,390,217		876,352										105,463		3,372,033
392	TRANSPORTATION EQUIPMENT	6,481,532		1,585,124		1,285,474								132,753		6,913,935
394	TOOLS, SHOP AND GARAGE EQUIPMENT	1,765,326		287,537												2,052,863
396	POWER OPERATED EQUIPMENT AND TOOLS	3,599,039		819,022		1,672,381								77,173		2,822,852
397	COMMUNICATION EQUIPMENT	1,900,129		322,102												2,222,231
TOTAL		**281,008,750**		**21,539,234**		**8,364,564**		**1,656,670**		**-**		**2,006,455**		**(1,446,747)**		**292,386,889**

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-D-Rate Base
Delivered on January 28, 2026

III-D.18

Request:

Provide a schedule showing details of THE ADJUSTMENTS TO plant in service and accumulated depreciation THAT WERE MADE TO DERIVE THE AMOUNTS INCLUDED IN THE PUBLIC UTILITY'S RATE BASE CLAIMS for the HTY, the FTY and the FPFTY AS APPLICABLE.

Response:

Please refer to National Fuel Exhibit A, Schedule C.2 HTY; FTY; and FPFTY for adjustments to plant in service.

Please refer to National Fuel Exhibit A, Schedule C.3 HTY; FTY; and FPFTY for adjustments to accumulated depreciation.

Prepared by or under the supervision of: Monika M. Duszenko

National Fuel Gas Distribution Corporation
Docket No. R- 2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-E-Rate of Return
Delivered on January 28, 2026

III-E.1

Request:

Provide THE ACTUAL YEAR END capitalization and capitalization ratios for the last 5-year period CONCLUDING WITH THE HTY and THE YEAR-END CAPITALIZATION AND CAPITALIZATION RATIOS projected FOR the FTY and the FPFTY, AS APPLICABLE (with short-term debt and without short-term debt) for the public utility, the parent company and the consolidated group.

Response:

The capitalization and capitalization ratios for NFGDC and National Fuel Gas Company for the last 5-year period ending with the HTY, the FTY and FPFTY both including and excluding short term debt are shown in the tables below. Note that Common Equity excludes Accumulated Other Comprehensive Income (AOCI).

Prepared by or under the supervision of: James C. Welch

National Fuel Gas Distribution Corporation
Docket No. R- 2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-E-Rate of Return
Delivered on January 28, 2026

(III-E.1 cont'd)

National Fuel Distribution Corp. (NFGDC)

($000's)	9/30/2021	9/30/2022	9/30/2023	9/30/2024	HTY 9/30/2025	FTY 9/30/2026	FPFTY 10/31/2027
Capital Structure Excluding Short Term Debt							
Capital Structure							
Long Term Debt	374,000	374,000	475,000	475,000	600,000	600,000	750,000
Common Equity	638,449	665,539	672,744	686,424	768,205	837,483	968,511
Total Capitalization	1,012,449	1,039,539	1,147,744	1,161,424	1,368,205	1,437,483	1,718,511
Capital Ratios							
Long Term Debt	36.9%	36.0%	41.4%	40.9%	43.9%	41.7%	43.6%
Equity	63.1%	64.0%	58.6%	59.1%	56.1%	58.3%	56.4%
Total Capitalization	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Capital Structure Including Short Term Debt							
Capital Structure							
Long Term Debt	374,000	374,000	475,000	475,000	600,000	600,000	750,000
Short Term Debt	123,400	249,200	105,300	217,300	191,700	176,432	46,776
Common Equity	638,449	665,539	672,744	686,424	768,205	837,483	968,511
Total Capitalization	1,135,849	1,288,739	1,253,044	1,378,724	1,559,905	1,613,915	1,765,288
Capital Ratios							
Long Term Debt	32.9%	29.0%	37.9%	34.5%	38.5%	37.2%	42.5%
Short Term Debt	10.9%	19.3%	8.4%	15.8%	12.3%	10.9%	2.6%
Equity	56.2%	51.6%	53.7%	49.8%	49.2%	51.9%	54.9%
Total Capitalization	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

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(III-E.1 cont'd)

National Fuel Gas Company (NFG)

($000's)	9/30/2021	9/30/2022	9/30/2023	9/30/2024	HTY 9/30/2025	FTY 9/30/2026	FPFTY 10/31/2027
Capital Structure Excluding Short Term Debt							
Capital Structure							
Long Term Debt	2,649,000	2,649,000	2,400,000	2,700,000	2,700,000	2,700,000	2,600,000
Common Equity	2,299,803	2,705,629	3,018,436	2,863,819	3,153,826	3,683,054	4,324,107
Total Capitalization	4,948,803	5,354,629	5,418,436	5,563,819	5,853,826	6,383,054	6,924,107
Capital Ratios							
Long Term Debt	53.5%	49.5%	44.3%	48.5%	46.1%	42.3%	37.5%
Equity	46.5%	50.5%	55.7%	51.5%	53.9%	57.7%	62.5%
Total Capitalization	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Capital Structure Including Short Term Debt							
Capital Structure							
Long Term Debt	2,649,000	2,649,000	2,400,000	2,700,000	2,700,000	2,700,000	2,600,000
Short Term Debt	158,500	60,000	287,500	90,700	150,200	49,615	-
Common Equity	2,299,803	2,705,629	3,018,436	2,863,819	3,153,826	3,683,054	4,324,107
Total Capitalization	5,107,303	5,414,629	5,705,936	5,654,519	6,004,026	6,432,669	6,924,107
Capital Ratios							
Long Term Debt	51.9%	48.9%	42.1%	47.7%	45.0%	42.0%	37.5%
Short Term Debt	3.1%	1.1%	5.0%	1.6%	2.5%	0.8%	0.0%
Equity	45.0%	50.0%	52.9%	50.6%	52.5%	57.3%	62.5%
Total Capitalization	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

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III-E.2

Request:

Provide the ACTUAL year-end interest coverage ON BOTH A before TAX and after TAX BASIS for the YEAR PERIOD ENDING WITH THE HTY and FOR THE MOST RECENT AVAILABLE TWELVE MONTH PERIOD. THE INTEREST COVERAGE SHOULD BE CALCULATED ON BOTH AN indenture and Securities and Exchange Commission (SEC) basis, for the public utility, the parent company and the consolidated group.

Response:

Please refer to ROR-023 for interest coverage ratios for National Fuel Gas Company and NFGDC.

Prepared by or under the supervision of: James C. Welch

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III-E.3

Request:

Provide the year-end preferred stock dividend coverages ON A CHARTER AND SEC BASIS for the 3-YEAR PERIOD ENDING WITH THE HTY AND THE MOST RECENT AVAILABLE TWELVE-MONTH PERIOD.

Response:

Not applicable. National Fuel Gas Company and NFGDC do not have any preferred stock.

Prepared by or under the supervision of: James C. Welch

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III-E.4

Request:

PROVIDE FOR THE PUBLIC UTILITY AND ITS PARENT COMPANY:

III.E.4.a REPORT ON FORM 10-Q FILED WITH THE SEC FOR THE FOUR MOST RECENT QUARTERS.

III.E.4.b THE MOST RECENT ANNUAL REPORT ON FORM 10-K FILED WITH THE SEC.

III.E.4.c PROSPECTUSES FOR COMMON STOCK, PREFERRED STOCK OR DEBT ISSUED DURING THE TWELVE MONTHS PRECEDING THE FILING.

Response:

a. All National Fuel Gas Company SEC filings including Form 10-Q's are archived at the following link: https://investor.nationalfuelgas.com/financials/sec-filings/default.aspx

b. National Fuel Gas Company Annual Reports are available at the following link: https://investor.nationalfuelgas.com/financials/annual-reports/default.aspx

c. National Fuel Gas Company did not issue preferred stock during the twelve months preceding the filing and common stock issuances were solely related to compensation. The prospectus for the National Fuel Gas Company's debt issuance in February 2025 can be found at the following link: https://investor.nationalfuelgas.com/financials/sec-filings/default.aspx

Prepared by or under the supervision of: James C. Welch

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III-E.5

Request:

Provide actual and projected capital requirements and sources of capital for the public utility, the parent company, and the consolidated group for the HTY, the FTY, the FPFTY and the 2 years immediately following the FPFTY.

Response:

Please see the following pages for the capital requirements and sources of capital for NFGDC and National Fuel Gas Company for the HTY, FTY, FPFTY and two years immediately following the FPFTY.

Prepared by or under the supervision of: James C. Welch

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(III-E.5 cont'd)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PROJECTED SOURCES AND USES OF FUNDS
($000 Omitted)

	HTY	FTY	FPFTY	FPFTY +1	FPFTY + 2
USES OF FUNDS					
Construction	$192,535	$201,760	$205,739	$207,585	$210,427
Common Dividends	54,400	60,400	65,000	67,855	70,728
Working Capital	116,011	0	0	6,480	14,307
Debt Retirement and Redemption	0	0	100,000	0	0
Net Decrease in Short Term Borrowing	25,600	15,268	242,584	0	0
Total Funds Required	$388,545	$277,428	$613,323	$281,920	$295,462
SOURCES OF FUNDS					
Internal Sources					
Net Income	83,249	77,596	87,913	91,174	101,248
Depreciation	69,701	73,637	73,582	73,070	76,728
Deferred Taxes	39,626	10,893	4,407	11,707	12,152
Other	17,465	47,351	47,027	36,127	36,469
Change in Working Capital	0	7,069	25,393	0	0
Total Internal Sources	210,041	216,546	238,323	212,078	226,597
External Sources					
Net Increase in Short Term Borroring	0	0	0	169,843	68,865
Parent Contributions	50,000	50,000	100,000	25,000	0
Issuance of Long Term Debt	125,000	0	275,000	(125,000)	0
Other Investing Activities	6,778	0	0	0	0
Total External Sources	181,778	50,000	375,000	69,843	68,865
Total Sources of Funds	$391,819	$266,546	$613,323	$281,920	$295,462
Change in Cash	$3,274	($10,882)	$0	$0	$0

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(III-E.5 cont'd)

NATIONAL FUEL GAS COMPANY
CONSOLIDATED PROJECTED SOURCES AND USES OF FUNDS
($000 Omitted)

	HTY	FTY	FPFTY	FPFTY +1	FPFTY + 2
USES OF FUNDS					
Construction	912,821	1,043,931	954,655	921,169	880,570
Common Dividends	188,438	195,592	205,508	211,284	219,140
Working Capital	190,723	68,207	6,970	16,127	26,432
Common Stock	59,087	3,184	7,719	6,055	6,080
Long-term Debt Retirement and Redemption	1,004,086	0	300,000	300,000	0
Net Decrease in Short Term Borrowing	0	100,585	246,422	0	0
Total Funds Required	2,355,155	1,411,499	1,721,275	1,454,635	1,132,222
SOURCES OF FUNDS					
Internal Sources					
Net Income	$518,504	$711,372	$767,641	$768,797	$832,838
Depreciation	456,594	498,465	535,254	562,296	589,853
Deferred Taxes	121,274	109,751	72,488	89,648	79,614
Other	194,377	82,352	78,010	68,472	67,550
Working Capital	0	0	0	0	0
Total Internal Sources	1,290,750	1,401,941	1,453,393	1,489,214	1,569,855
External Sources					
Net Increase in Short Term Borroring	59,500	0	0	0	0
Issuance of Long Term Debt	988,729	0	296,994	0	0
Sale of Assets					
Other Investing Activities	21,121	0	0	0	0
Total External Sources	1,069,350	0	296,994	0	0
Total Sources of Funds	$2,360,099	$1,401,941	$1,750,387	$1,489,214	$1,569,855
Change in Cash	$4,944	($9,558)	$29,113	$34,579	$437,632

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III-E.6

Request:

Provide a schedule of debt and preferred stock of the public utility, the parent company and the consolidated group as of the HTY year-end and most current date. Note projected new issues, retirements, and other major changes from the comparable historical data. Include all of the following details:

III.E.6.a Date of issue.
III.E.6.b Date of maturity.
III.E.6.c Amount issued.
III.E.6.d Amount outstanding.
III.E.6.e Amount retired.
III.E.6.f Amount reacquired.
III.E.6.g Gain or loss on reacquisition.
III.E.6.h Coupon rate.
III.E.6.i Discount or premium at issuance.
III.E.6.j Issuance expenses.
III.E.6.k Net proceeds.
III.E.6.l Sinking fund requirements.
III.E.6.m Effective interest rate.
III.E.6.n Dividend rate.
III.E.6.o Effective cost rate.
III.E.6.p Total WEIGHTED average effective cost RATES FOR DEBT AND PREFFED STOCK.

Response:

Please see attached. Note there is no preferred stock in the capital structure.

Prepared by or under the supervision of: James C. Welch

National Fuel Gas Distribution Corporation
Calculation of the Composite Interest Rate of Total Debt
Actual at September 30, 2025

Type	Amount Outstanding	Effective Cost Rate(1)	Annualized Cost	Composite Cost Rate
Medium-Term Notes				
3.95% Due 2027	$ 100,000,000	4.15%	$ 4,150,000	
4.75% Due 2028	125,000,000	4.97%	6,212,500	
2.95% Due 2031	50,000,000	3.06%	1,530,000	
5.50% Due 2026	150,000,000	5.79%	8,685,000	
5.949% Due 2035	175,000,000	6.12%	10,710,000	
Total Medium-Term Notes	$ 600,000,000		$ 31,287,500	5.21%
Committed Line of Credit Fee			896,275	0.15%
Total Long-Term Debt	$ 600,000,000		$ 32,183,775	5.36%

Note: Excludes any amortization on Parent's issuance-related costs
(1) From page 5 of this Schedule

National Fuel Gas Distribution Corporation
Calculation of the Composite Interest Rate of Total Debt
Estimated at September 30, 2026

Type	Amount Outstanding	Effective Cost Rate(1)	Annualized Cost	Composite Cost Rate
Medium-Term Notes				
3.95% Due 2027	$ 100,000,000	4.15%	$ 4,150,000	
4.75% Due 2028	125,000,000	4.97%	6,212,500	
2.95% Due 2031	50,000,000	3.06%	1,530,000	
5.50% Due 2026	150,000,000	5.79%	8,685,000	
5.949% Due 2035	175,000,000	6.12%	10,710,000	
Total Medium-Term Notes	$ 600,000,000		$ 31,287,500	5.21%
Committed Line of Credit Fee			874,695	0.15%
Total Long-Term Debt	$ 600,000,000		$ 32,162,195	5.36%

Note: Excludes any amortization on Parent's issuance-related costs
(1) From page 5 of this Schedule

National Fuel Gas Distribution Corporation
Calculation of the Composite Interest Rate of Total Debt
Estimated at October 31, 2027

Type	Amount Outstanding	Effective Cost Rate(1)	Annualized Cost	Composite Cost Rate
Medium-Term Notes				
4.75% Due 2028	125,000,000	4.97%	6,212,500	
2.95% Due 2031	50,000,000	3.06%	1,530,000	
5.949% Due 2035	175,000,000	6.12%	10,710,000	
5.50% Due 2036	125,000,000	5.63%	7,037,500	
5.50% Due 2037	275,000,000	5.63%	15,482,500	
Total Medium-Term Notes	$ 750,000,000		$ 40,972,500	5.46%
Committed Line of Credit Fee			879,504	0.12%
Total Long-Term Debt	$ 750,000,000		$ 41,852,004	5.58%

Note: Excludes any amortization on Parent's issuance-related costs
(1) From page 5 of this Schedule

National Fuel Gas Distribution Corporation
Calculation of the Effective Interest Rate of Long-Term Debt by Series

Series	Date of Issue	Date of Maturity	Term in Years	Principal Amount Issued	Premium or (Discount) at Issuance	Commission for Issuance	Issuance Expenses	Net Proceeds	Net Proceeds Ratio	Effective Cost Rate to Maturity
Medium-Term Notes										
3.95% Due 2027	September 27, 2017	September 15, 2027	10	$100,000,000	(683,000)	(650,000)	(300,330)	$98,366,670	98.37%	4.15%
4.75% Due 2028	August 17, 2018	September 1, 2028	10	$125,000,000	(908,750)	(812,500)	(391,942)	$122,886,808	98.31%	4.97%
2.95% Due 2031	February 24, 2021	March 1, 2031	10	$50,000,000	(30,500)	(325,000)	(132,686)	$49,511,814	99.02%	3.06%
5.50% Due 2026	May 18, 2023	October 1, 2026	3	$150,000,000	(330,000)	(525,000)	(491,768)	$148,653,233	99.10%	5.79%
5.949% Due 2035	February 19, 2025	March 15, 2035	10	$175,000,000	(575,750)	(1,137,500)	(514,325)	$172,772,425	98.73%	6.12%
5.50% Due 2036	October 1, 2026	October 1, 2036	10	$125,000,000	-	(812,500)	(390,373)	$123,797,127	99.04%	5.63%
5.50% Due 2037	September 15, 2027	September 15, 2037	10	$275,000,000	-	(1,787,500)	(993,199)	$272,219,301	98.99%	5.63%

National Fuel Gas Company
Calculation of the Composite Interest Rate of Total Debt
Actual at September 30, 2025

Type	Amount Outstanding	Effective Cost Rate(1)	Annualized Cost	Composite Cost Rate
Medium-Term Notes				
3.95% Due 2027	$ 300,000,000	4.15%	$ 12,450,000	
4.75% Due 2028	300,000,000	4.97%	14,910,000	
2.95% Due 2031	500,000,000	3.06%	15,300,000	
5.50% Due 2026	300,000,000	5.79%	17,370,000	
5.89% Due 2026	300,000,000	6.01%	18,030,000	
5.499% Due 2030	500,000,000	5.71%	28,550,000	
5.949% Due 2035	500,000,000	6.12%	30,600,000	
Total Medium-Term Notes	$ 2,700,000,000		$ 137,210,000	5.08%
Committed Line of Credit Fee			3,432,690	0.13%
Net Premium and Issuance Expense Adjustments (2)				
2017 October	$ (2,055,090)			
2018 September	$ (3,558,318)			
2025 March (30)	(4,438,395)			
2025 March (35)	(9,167,025)			
Total Adjustments	$ (19,218,828)			
Annual Amortization of Premium (Pre-Tax) (3)				
2017 October			$ 704,700	
2018 September			946,524	
2025 March (30)			93,450	
2025 March (35)			191,625	
Reduction of Annualized Cost Resulting from Recovery of Annual Premium Amortization (4)				
2017 October			$ (206,443)	
2018 September			(292,246)	
2025 March (30)			(1,100)	
2025 March (35)			(2,442)	
			$ 1,434,068	
Total Long-Term Debt	$ 2,680,781,172		$ 142,076,758	5.30%
Short-Term Debt	$ 180,278,713 (5)	4.97% (6)	$ 8,961,921	
Total Debt	$ 2,861,059,885		$ 151,038,679	5.28%

National Fuel Gas Company
Calculation of the Composite Interest Rate of Total Debt
Estimated at September 30, 2026

Type	Amount Outstanding	Effective Cost Rate(1)	Annualized Cost	Composite Cost Rate
Medium-Term Notes				
3.95% Due 2027	$ 300,000,000	4.15%	12,450,000	
4.75% Due 2028	300,000,000	4.97%	14,910,000	
2.95% Due 2031	500,000,000	3.06%	15,300,000	
5.50% Due 2026	300,000,000	5.79%	17,370,000	
5.21% Due 2026	300,000,000	5.33%	15,990,000	
5.499% Due 2030	500,000,000	5.71%	28,550,000	
5.949% Due 2035	500,000,000	6.12%	30,600,000	
Total Medium-Term Notes	$ 2,700,000,000		$ 135,170,000	5.01%
Committed Line of Credit Fee			3,350,038	0.12%
Net Premium and Issuance Expense Adjustments (7)				
2017 October	$ (1,068,647)			
2018 September	$ (2,372,212)			
2025 March (30)	(3,452,085)			
2025 March (35)	(8,202,075)			
Total Adjustments	$ (15,095,019)			
Annual Amortization of Premium (Pre-Tax) (3)				
2017 October			$ 704,700	
2018 September			946,524	
2025 March (30)			160,200	
2025 March (35)			328,500	
Reduction of Annualized Cost Resulting from Recovery of Annual Premium Amortization (8)				
2017 October			$ (234,278)	
2018 September			(337,205)	
2025 March (30)			(8,808)	
2025 March (35)			(19,544)	
			$ 1,540,089	
Total Long-Term Debt	$ 2,684,904,981		$ 140,060,127	5.22%
Short-Term Debt	$ 117,870,078 (9)	4.50% (10)	$ 5,304,153	
Total Debt	$ 2,802,775,059		$ 145,364,281	5.19%

National Fuel Gas Company
Calculation of the Composite Interest Rate of Total Debt
Estimated at October 31, 2027

Type	Amount Outstanding	Effective Cost Rate(1)	Annualized Cost	Composite Cost Rate
Medium-Term Notes				
4.75% Due 2028	$ 300,000,000	4.97%	$ 14,910,000	
2.95% Due 2031	$ 500,000,000	3.06%	$ 15,300,000	
5.499% Due 2030	$ 500,000,000	5.71%	$ 28,550,000	
5.949% Due 2035	$ 500,000,000	6.12%	$ 30,600,000	
5.50% Due 2036	$ 500,000,000	5.63%	$ 28,150,000	
5.50% Due 2037	$ 300,000,000	5.63%	$ 16,890,000	
Total Medium-Term Notes	$ 2,600,000,000		$ 134,400,000	5.17%
Committed Line of Credit Fee			$ 3,368,458	0.13%
Net Premium and Issuance Expense Adjustments (11)				
2017 October	$ -			
2018 September	$ (1,087,264)			
2025 March (30)	$ (2,383,583)			
2025 March (35)	$ (7,156,713)			
Total Adjustments	$ (10,627,559)			
Annual Amortization of Premium (Pre-Tax) (3)				
2017 October			$ -	
2018 September			$ 946,524	
2025 March (30)			$ 160,200	
2025 March (35)			$ 328,500	
Reduction of Annualized Cost Resulting from Recovery of Annual Premium Amortization (12)				
2017 October			$ (264,434)	
2018 September			$ (385,912)	
2025 March (30)			$ (18,353)	
2025 March (35)			$ (40,719)	
			$ 725,806	
Total Long-Term Debt	$ 2,589,372,441		$ 138,494,264	5.35%
Short-Term Debt	$ 40,661,460 (13)	4.50% (14)	$ 1,829,766	
Total Debt	$ 2,630,033,902		$ 140,324,030	5.34%

National Fuel Gas Company
Calculation of the Composite Interest Rate of Total Debt

Notes:

(1) From page 15 of this Schedule

(2) Unamortized balances of pre-tax premium and issuance expenses at June 30, 2022 from page 10 of this Schedule

(3) Annual amortization of pre-tax premiums

(4) Annualized interest cost adjustment to reflect the impact of the annual amortization of pre-tax premiums at June 30, 2022

(5) Average short-term debt balance for the twelve months ended September 30, 2025

(6) Average short-term debt cost rate for the twelve months ended September 30, 2025

(7) Projected unamortized balances of pre-tax premium and issuance expenses at June 30, 2023 from page 10 of this Schedule

(8) Annualized interest cost adjustment to reflect the impact of the annual amortization of pre-tax premiums at June 30, 2023

(9) Estimated average short-term debt balance for the twelve months ended September 30, 2026

(10) Estimated average short-term debt cost rate for the twelve months ended September 30, 2026

(11) Projected unamortized balances of pre-tax premium and issuance expenses at July 31, 2024 from page 10 of this Schedule

(12) Annualized interest cost adjustment to reflect the impact of the annual amortization of pre-tax premiums at July 31, 2024

(13) Estimated average short-term debt balance for the twelve months ended October 31, 2027

(14) Estimated average short-term debt cost rate for the twelve months ended October 31, 2027

National Fuel Gas Company
Amortization of Capital Structure Adjustments for Ratemaking Purposes

						Actual At September 30, 2025			Projected At September 30, 2026			Projected At October 31, 2027		
		Base Year Adjustment	Months of Amort.	Monthly Amort.	Start Date	# of Mos.	Amount Amortized	Balance Outstanding	# of Mos.	Amount Amortized	Balance Outstanding	# of Mos.	Amount Amortized	Balance Outstanding
1)	2017 October	$9,864,433 (1)	120	$82,204	Oct-17	95	$7,809,343	$2,055,090	107	$8,795,786	$1,068,647	120	$9,864,433	$0
2)	2018 September	$11,861,058 (2)	120	$98,842	Sep-18	84	$8,302,741	$3,558,318	96	$9,488,847	$2,372,212	109	$10,773,795	$1,087,264
3)	2025 March (30)	$4,931,550 (3)	60	$82,193	Apr-25	6	$493,155	$4,438,395	18	$1,479,465	$3,452,085	31	$2,547,968	$2,383,583
4)	2025 March (35)	$9,649,500 (4)	120	$80,413	Apr-25	6	$482,475	$9,167,025	18	$1,447,425	$8,202,075	31	$2,492,788	$7,156,713
						Total		$19,218,828	Total		$15,095,019	Total		$10,627,559

Notes:
(1) From page 11 of this Schedule
(2) From page 12 of this Schedule
(3) From page 13 of this Schedule
(4) From page 14 of this Schedule

National Fuel Gas Company
2017 (October) Base Year Refinancing Activity

Premiums Resulting From Refinancing	
6.50% due 2018	$ 7,047,000
Total Pre-Tax Premiums	$ 7,047,000
Expenses Resulting From Refinancing:	
3.95% Medium Term Note due 2027	
- Discount and Underwriters' Expense	$ 1,950,000
- Issuance Expenses	867,433
Total Expenses	$ 2,817,433
Adjustment to Capital Structure	$ 9,864,433

National Fuel Gas Company
2018 (September) Base Year Refinancing Activity

Premiums Resulting From Refinancing	
8.75% due 2019	$ 9,465,225
Total Pre-Tax Premiums	$ 9,465,225
Expenses Resulting From Refinancing:	
4.15% Medium Term Note due 2028	
- Discount and Underwriters' Expense	$ 1,625,000
- Issuance Expenses	770,833
Total Expenses	$ 2,395,833
Adjustment to Capital Structure	$ 11,861,058

National Fuel Gas Company
2025 (March 5-Year) Base Year Refinancing Activity

Premiums Resulting From Refinancing	
5.20% due 2025	$ 801,000
Total Pre-Tax Premiums	$ 801,000
Expenses Resulting From Refinancing:	
5.50% Medium Term Note due 2030	
- Discount and Underwriters' Expense	$ 2,808,000
- Issuance Expenses	1,322,550
Total Expenses	$ 4,130,550
Adjustment to Capital Structure	$ 4,931,550

National Fuel Gas Company
2025 (March 10-Year) Base Year Refinancing Activity

Premiums Resulting From Refinancing	
5.50% due 2026	$ 3,285,000
Total Pre-Tax Premiums	$ 3,285,000
Expenses Resulting From Refinancing:	
5.95% Medium Term Note due 2035	
- Discount and Underwriters' Expense	$ 4,895,000
- Issuance Expenses	1,469,500
Total Expenses	$ 6,364,500
Adjustment to Capital Structure	$ 9,649,500

National Fuel Gas Company
Calculation of the Effective Interest Rate of Long-Term Debt by Series

Series	Date of Issue	Date of Maturity	Term in Years	Principal Amount Issued	Premium or (Discount) at Issuance	Commission for Issuance	Issuance Expenses	Net Proceeds	Net Proceeds Ratio	Effective Cost Rate to Maturity (1)
Medium-Term Notes										
3.95% Due 2027	September 27, 2017	September 15, 2027	10	$300,000,000	(2,049,000)	(1,950,000)	(900,991)	$295,100,009	98.37%	4.15%
4.75% Due 2028	August 17, 2018	September 1, 2028	10	$300,000,000	(2,181,000)	(1,950,000)	(940,661)	$294,928,339	98.31%	4.97%
2.95% Due 2031	February 24, 2021	March 1, 2031	10	$500,000,000	(305,000)	(3,250,000)	(1,326,857)	$495,118,143	99.02%	3.06%
5.50% Due 2026	May 18, 2023	October 1, 2026	3	$300,000,000	(660,000)	(1,050,000)	(983,535)	$297,306,465	99.10%	5.79%
5.89% Due 2026	April 10, 2024 (2)	February 14, 2026 (1)	2	$300,000,000	-	-	(666,396)	$299,333,604	99.78%	6.01%
5.499% Due 2030	February 19, 2025	March 15, 2030	5	$500,000,000	(120,000)	(3,000,000)	(1,469,500)	$495,410,500	99.08%	5.71%
5.949% Due 2035	February 19, 2025	March 15, 2035	10	$500,000,000	(1,645,000)	(3,250,000)	(1,469,500)	$493,635,500	98.73%	6.12%
5.50% Due 2036	October 1, 2026	October 1, 2036	10	$500,000,000	-	(3,250,000)	(1,561,490)	$495,188,510	99.04%	5.63%
5.50% Due 2037	September 15, 2027	September 15, 2037	10	$300,000,000	-	(1,950,000)	(1,083,490)	$296,966,510	98.99%	5.63%

(1) Term loan currently due on February 14, 2026, but cost of debt calculations assume maturity is extended until October 1, 2026
(2) Term loan rate based on fiscal year 2025 average daily rate

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III-E.7

Request:

If a claim is made for a cost of debt that exceeds the cost of debt shown in the nominal cost schedule under E.6 because of, for example, convertible features, sale with warrants or other reason, provide a full statement of the basis for such claim.

Response:

Not applicable. The Company is not claiming a cost of debt exceeding the cost of debt supported in III-E.6.

Prepared by or under the supervision of: James C. Welch

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III-E.8

Request:

PROVIDE AVAILABLE DETAILS ON COMMON STOCK OFFERINGS OF THE PUBLIC UTILITY, IF PUBLICLY TRADED, AND OF THE PARENT COMPANY, IF PUBLICLY TRADED, FOR THE FIVE-YEAR PERIOD INCLUDING THE HTY AND FOR ANY PLANNED ISSUANCE THAT OCCURRED BETWEEN THE HTY AND THE FILING DATE AND PLANNED FOR THE FTY AND THE FPFTY, INCLUDING:

III.E.8.a	Date of prospectus.
III.E.8.b	Date of offering.
III.E.8.c	Record date.
III.E.8.d	Offering period including dates and number of days.
III.E.8.e	Amount and number of shares of offering.
III.E.8.f	Offering ratio, if rights offering.
III.E.8.g	Percent subscribed.
III.E.8.h	Offering price.
III.E.8.i	Gross proceeds per share.
III.E.8.j	Expenses per share.
III.E.8.k	Net proceeds per share in previously listed 8.i and 8.j.
III.E.8.l	"Market price per share to include each of the following: i. At record date. ii. At offering date. iii. One month after close of offering."
III.E.8.m	"Average market price during offering to include each of the following: i. Price per share. ii. Rights per share-average value of rights."
III.E.8.n	Most current reported earnings per share at time of offering.
III.E.8.o	Most current reported dividends at time of offering.

Response:

For the five fiscal years ended September 30, 2025, National Fuel Gas Company issued 1,434,000 shares of common stock, issued solely under its stock and benefit plans.

Details of historical stock offerings are based on information presented in Note H in the Company’s annual 10-K filings:

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Stock issued (in thousands of shares):

Fiscal Year	Number of Shares
2025	237
2024	333
2023	341
2022	296
2021	227
Total	1,434

National Fuel Gas Company has not issued any stock aside from issuances related to its benefit plans since the end of the HTY. National Fuel Gas Company will likely have a common stock issuance in connection with its recently announced Ohio Gas acquisition, but timing and size of issuance is not definitively known at this time.

Prepared by or under the supervision of: James C. Welch

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III-E.9

Request:

Provide complete support for the claimed rate of return on common equity. Provide the actual earned return on common equity for the HTY and the 2 years immediately preceding the HTY.

Response:

Please refer to National Fuel Exhibit A_FPFTY, Schedule B-7 and Statement No. 10 Direct Testimony of Joshua Nowak supporting claimed rate of return on common equity. Please refer to National Fuel Exhibit A_HTY, Schedule A-1 for filed return on common equity for the HTY.

Per National Fuel's Filed Quarterly Earnings Reports:

September 30, 2023 – Per book ROE 7.29%; adjusted 9.58%
September 30, 2024 – Per book ROE 14.13%; adjusted 8.63%
September 30, 2025 – Per book ROE 11.51%; adjusted 6.03%

Prepared by or under the supervision of: Donald N. Koch

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III-E.10

Request:

Provide schedules of comparative financial data and ratios for the public utility for the HTY, the 2 years immediately preceding the HTY, the FTY and the FPFTY. Note changes in ratings by all applicable rating agencies covering the entity on the schedules. Include the rating agencies' write-ups of these changes if available. Provide the financial data and ratio schedules and ratings change information for the parent company if the data, schedules or information are not available for the public utility. Show all of the following:

III.E.10.a	Earnings-price ratio (average).
III.E.10.b	Times interest earned ratio on a pre-tax basis and a post-tax basis.
III.E.10.c	Preferred stock dividend coverage ratio on a post-tax basis.
III.E.10.d	Times fixed charges earned ratio on a pre-tax basis.
III.E.10.e	Dividend payout ratio.
III.E.10.f	AFUDC as a percent of earnings available for common equity.
III.E.10.g	CWIP as a percent of net public utility plant.
III.E.10.h	Effective income tax rate.
III.E.10.i	Internal cash generation as a percent of total capital requirements.
III.E.10.j	Times fixed charges earned ratio on a post-tax basis.
III.E.10.k	Earnings per share.
III.E.10.l	Dividend per share.
III.E.10.m	Average dividend yield (52-week high/low common stock price).
III.E.10.n	Average book value per share.
III.E.10.o	Average market price per share.
III.E.10.p	Market price-book value ratio.
III.E.10.q	Earnings-book value ratio (per-share basis, average book value).
III.E.10.r	Debt-Service Coverage Ratio.

Response:

Please reference the table on the following page. Information is presented for NFGDC where available and National Fuel Gas Company when the requested information is not available for NFGDC.

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(III-E.10 cont'd)

		12-Month Period Ending				
	Entity	9/30/2023	9/30/2024	HTY 9/30/2025	FPY 9/30/2026	FPFTY 10/31/2027
Rating Agency Ratings						
Moody's	NFG	Baa3	Baa3	Baa3	N/A	N/A
S&P	NFG	BBB-	BBB-	BBB-	N/A	N/A
Fitch	NFG	BBB	BBB	BBB	N/A	N/A
a. Earnings to price ratio (average)[1]	NFG	9.1%	9.3%	9.2%	N/A	N/A
b. Times Interest Earned ratio - pre tax	NFGDC	2.44	2.51	2.65	2.47	2.90
b. Times Interest Earned ratio - post tax	NFGDC	2.23	2.40	2.29	2.16	2.49
c. Preferred stock dividend coverage ratio	NFG	N/A	N/A	N/A	N/A	N/A
d. Times fixed charges earned ratio - pre-tax	NFGDC	2.44	2.51	2.65	2.47	2.90
e. Dividend payout ratio	NFGDC	95.9%	81.3%	65.3%	77.8%	73.9%
f. AFUDC as % of Earnings available to common equity	NFGDC	-0.3%	0.0%	0.2%	0.0%	1.0%
g. CWIP as a percent of net public utility plant	NFGDC	2.4%	2.7%	2.5%	2.4%	2.2%
h. Effective income tax rate	NFGDC	14.7%	7.5%	22.0%	21.3%	21.5%
i. Internal cash generation as a % of capital req	NFGDC	82.8%	92.5%	106.2%	86.6%	87.0%
j. Times fixed charges earned ratio - post-tax	NFGDC	2.23	2.40	2.29	2.16	2.49
k. Earnings per share[1]	NFG	$5.17	$5.01	$6.91	$7.79	$8.37
l. Dividends per share	NFG	$1.92	$2.00	$2.08	$2.16	$2.24
m. Average Dividend Yield	NFG	3.4%	3.7%	2.8%	N/A	N/A
n. Average book value per share	NFG	$32.07	$33.52	$33.32	$38.64	$45.61
o. Average marketprice per share	NFG	$57.07	$53.63	$75.23	N/A	N/A
p. Market price-book value ratio	NFG	1.78	1.60	2.26	N/A	N/A
q. Earnings - book value ratio[1]	NFG	16.1%	14.9%	20.7%	20.2%	18.4%
r. Debt Service Coverage Ratio	NFGDC	2.44	2.51	2.65	2.47	2.90

(1) Earnings per share adjusted for non-cash impairments

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III-E.11

Request:

Provide an AFUDC schedule that includes all of the following:

III.E.11.a AFUDC rate charged by the public utility at the end of the HTY, the FTY and the FPFTY.
III.E.11.b How the AFUDC rate was calculated.
III.E.11.c Explanation of the method used to calculate the AFUDC amounts.
III.E.11.d Cross-reference to where each of the items in previously listed 11.a—11.c is reflected in the current base rate case filing.

Response:

Please refer to ROR-005 for NFGDC's AFUDC rate calculation effective at the end of the HTY. The Company has not included AFUDC in its calculation of customer rates for the FTY and FPFTY and therefore does not have AFUDC rates to report for those periods.

Prepared by or under the supervision of: James C. Welch

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III-E.12

Request:

Provide all of the following information concerning bank notes payable for the HTY:

III.E.12.a Line of credit at each bank.
III.E.12.b Average daily balances of notes payable to each bank, by name of bank.
III.E.12.c Interest rate charged on each bank note (prime rate, formula).
III.E.12.d Purpose of each bank note (for example, construction, fuel storage, working capital, debt retirement and the like).
III.E.12.e Prospective need in the next 5 years for this type of financing.

Response:

a. See page 2 – Column (a)
b. See page 2 – Column (b)
c. See Page 2 – Column (c)
d. See Page 3
e. See Page 3

Prepared by or under the supervision of: Shannon M. Buffington

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National Fuel Gas Company
Lines of Credit by Bank
12 Months Ending 9/30/25

Bank (1)	(a) Lines of Credit (2)	(b) Average Daily Balances of Notes Payable (3)	(c) Interest Rate Charged on Each Bank Note (4)
Bank Lines			
HSBC Bank	35,000,000	-	
Bank of America	30,000,000	-	
Total Bank Lines	65,000,000		
Committed Lines of Credit			
Committed Line of Credit (5)	1,000,000,000		
Committed Line of Credit (6)	300,000,000	300,000,000	
Total Committed Lines of Credit	1,365,000,000		
Commercial Paper (1)	500,000,000	$180,278,712.88	
	1,865,000,000	480,278,713	5.5442%

(1) If intra-system sources of funds are insufficient to meet the short-term loan requests, National will issue and sell up to $500 million aggregate principal amount at any one time outstanding of its commercial paper, and/or borrow under the above bank lines of credit. National will make the proceeds available to its participating subsidiaries through the money pool.

(2) All lines of credit are established between National Fuel Gas Company (National) and the respective banks or commercial paper dealers. The Company's Money Pool Agreement has been filed with FERC and PA PUC in 2018.

(3) The amounts represent the average daily debt balances for the 12 months ending September 30, 2025.

(4) The interest rate represents the daily weighted average interest rate on the borrowings which were outstanding under the respective lines of credit during the 12 months ending September 30, 2025.

(5) Commitments effective May 2, 2025		%	Allocation
JPMorgan Chase	$ 120,000,000	12%	-
Bank of America	110,000,000	11%	-
PNC Bank, National Association	110,000,000	11%	-
Wells Fargo	110,000,000	11%	-
Canadian Imperial Bank of Commerce(CIBC)	80,000,000	8%	-
KeyBank	80,000,000	8%	-
The Toronto-Dominion Bank, NY Branch	80,000,000	8%	-
US Bank National Association	80,000,000	8%	-
Comerica Bank & Trust	60,000,000	6%	-
HSBC Bank USA, National Association	60,000,000	6%	-
M&T Bank	60,000,000	6%	-
Mizuho Bank	50,000,000	5%	-
TOTAL:	$ 1,000,000,000	100%	$ -

(6) Agreement dated 2/14/24			
JP Morgan Chase	$ 70,000,000	23%	70,000,000
Bank of America	$ 70,000,000	23%	70,000,000
PNC Bank	$ 70,000,000	23%	70,000,000
US Bank	$ 30,000,000	10%	30,000,000
Wells Fargo	$ 30,000,000	10%	30,000,000
The Toronto-Dominion Bank, NY Branch	$ 30,000,000	10%	30,000,000
TOTAL:	$ 300,000,000	100%	$ 300,000,000

(III-E.12 cont'd)

D. Use of Proceeds

It is anticipated that, from time-to-time, the subsidiaries of National Fuel will need to incur short-term borrowings from sources external to the individual subsidiary. Each subsidiary may have different capital requirements in connection with their respective operations, including but not limited to, construction and development programs, margin calls on derivative financial instruments, financing of deferred accounts receivable, and general corporate purposes.

Specific to National Fuel Gas Distribution Corporation, it is anticipated that, from time-to-time, Distribution will need to incur short-term borrowings from sources external to Distribution. This capital requirement arises in connection with Distribution's construction program, the purchase of gas to be placed in storage during the summer months and withdrawn for sale in the winter months, the financing of deferred purchased gas costs and accounts receivable, and other general corporate purposes.

E. Prospective Future Needs

Because of the seasonal nature of the natural gas business and its effect on cash flow during certain periods, it is necessary for National Fuel Gas to establish lines of credit with banks and other lending institutions. Availability of these lines would provide capital for the purposes discussed under "Use of Proceeds".

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III-E.13

Request:

If a claim is made for compensating bank balances, provide all of the following information:

III.E.13.a Name and address of each bank.
III.E.13.b Types of accounts with each bank such as checking, savings, escrow, other services, and the like.
III.E.13.c Average daily balance in each account from the start of the HTY through the date of filing.
III.E.13.d Amount and percentage requirements for compensating bank balances at each bank.
III.E.13.e Average daily compensating bank balance at each bank.
III.E.13.f Documents from each bank explaining compensating bank balance requirements.
III.E.13.g Interest earned on each type of account.
III.E.13.h A calculation showing the average daily float for each bank.

Response:

No claim is being made for compensating bank balances in this filing.

Prepared by or under the supervision of: James C. Welch

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III-E.14

Request:

If a claim is made for compensating bank balances, provide the amount of compensating bank balances required under ANNUALIZED test year operations at pro forma present rates

Response:

No claim is being made for compensating bank balances.

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III-E.15

Request:

Provide the charter and indentures provisions, if applicable, for the public utility and the parent company that describe coverage requirements, limits on proportions of types of capital outstanding, and restrictions on dividend payouts.

Response:

Restrictions contained in the National Fuel Gas Company Restated Certificate of Incorporation, as amended ("Charter")

The Charter provides that dividends may be declared and paid on National Fuel Gas Company stock only out of the funds legally available for the payment of such dividends. Otherwise, the Charter contains no currently effective restrictions on the payment of dividends, as there currently is no outstanding preferred stock issued by National Fuel Gas Company.

However, if any shares of preferred stock are outstanding, the authority of the Board of Directors to declare and pay dividends on National Fuel Gas Company common stock is subject to the rights and preferences of each series of preferred stock outstanding, as such rights and preferences may be determined by the Board of Directors (See Article FOURTH, Paragraph 4 on Schedule 1, Exhibit No. 409, page 3 of 3.)

The Board of Directors may determine the designation, the number and the special and relative rights, powers, preferences and limitations of each series of preferred stock created. This power includes, among other things, the power to determine the following terms:

- The preference or relation that dividends on any series of preferred stock shall bear to the dividends payable on any other class or classes or any other series of capital stock; and
- The limitations and restrictions, if any, to be effective while any shares of any series of preferred stock are outstanding, upon the payment of dividends on the common stock or any other class or

classes or any other series of capital stock of the corporation ranking junior to the shares of such series.

(See Article FOURTH, Paragraphs 1(c) and 1(h) on schedule 1, Exhibit No. 409, pages 1 and 2 of 3.)

The Charter does not contain any coverage requirements or any currently effective restrictions on the proportions of types of capital outstanding. However, the Board of Directors has the authority to determine the conditions and restrictions, if any, to be effective while any shares of any series of preferred stock are outstanding, upon the creation of indebtedness of the corporation or upon the issuance of any additional stock ranking on a parity with or prior to the shares of such series. (See Article FOURTH, Paragraph 1(i) on Schedule 1, Exhibit 409, page 2 of 3.)

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mortgage and convey real estate and personal property outside of the State of New Jersey.

ARTICLE FOURTH

Capital Stock

The total authorized capital stock of this corporation shall consist of Ten Million (10,000,000) shares of Preferred Stock having the par value of One Dollar ($1.00) per share and Two Hundred Million (200,000,000) shares of Common Stock having the par value of One Dollar ($1.00) per share.

The designations and relative rights, powers, preferences and limitations of the different classes of capital stock of this corporation are as follows:

1. Characteristics of Common Stock and Preferred Stock.

The Board of Directors shall have the authority to amend this Certificate of Incorporation from time to time to divide the shares of the Preferred Stock into one or more series and to determine the designation, the number, and the special and relative rights, powers, preferences and limitations of the shares of each series so created. For illustrative purposes only, the forgoing power of the Board of Directors shall include, but shall not be limited to, the determination of the following terms:

(a) the maximum number of shares to constitute each such series, which may subsequently be increased or decreased (but not below the number of shares of such series then outstanding) by resolution of the Board of Directors, the distinctive designation thereof and the stated value thereof if different from the par value thereof;

(b) whether the shares of each such series shall have voting rights and, if such shares are given voting rights, the terms of such voting rights, subject to the provisions of paragraph 7 hereof;

(c) the dividend rate or rates, if any, on the shares of each such series or the manner in which such rate or rates shall be determined, the conditions and dates upon which such dividends shall be payable, the preference or relation that such dividends shall bear to the dividends payable on any other class or classes or any other series of capital stock (including whether such dividends shall be participating or non-participating with respect to any other class or classes or any other series of capital stock), whether such dividends shall be cumulative or noncumulative, and if cumulative, the date or dates from which any such dividends shall be cumulative;

(d) whether the shares of each such series shall be subject to redemption, and, if made subject to redemption, the time or times, price or prices and other terms, limitations, restrictions or conditions of such redemption, including whether such redemption shall be made at the election of the corporation or the holders of such shares;

(e) the relative amounts, and the relative rights or preferences, if any, of payment in respect of shares of each such series which the holders of shares of each such series shall be entitled to receive upon the voluntary or involuntary liquidation, dissolution or winding-up of the corporation, including whether such rights shall be limited or participating with respect to shares of any other class or classes or any other series of capital stock upon the voluntary or involuntary liquidation, dissolution or winding up of the corporation;

(f) whether or not the shares of each such series shall be subject to the operation of a retirement or sinking fund and, if so, the terms and provisions relative to the operation of such retirement or sinking fund;

(g) whether or not the shares of each such series shall be convertible into, or exchangeable for, shares of any other class or classes or any other series of capital stock, or other securities, whether or not issued by the corporation, and if so convertible or exchangeable, the price or prices or the rate or rates of conversion or exchange, the method, if any, of adjusting any such price or prices or rate or rates and whether such shares shall be convertible or exchangeable at the election of the corporation or the holders of such shares;

(h) the limitations and restrictions, if any, to be effective while any shares of each such series are outstanding, upon the payment of dividends or the making of other distributions on, and upon the purchase, redemption or other acquisition by the corporation of, the Common Stock or any other class or classes or any other series of capital stock of the corporation ranking junior to the shares of such series either as to dividends or upon liquidation, dissolution or winding-up of the corporation;

(i) the conditions or restrictions, if any, to be effective while any shares of each such series are outstanding, upon the creation of indebtedness of the corporation or upon the issuance of any additional stock (including additional shares of such series or of any other class) ranking on a parity with or prior to the shares of such series as to dividends or distribution of assets upon liquidation, dissolution or winding-up of the corporation; and

(j) any other preference, relative, participating, optional or other special rights, and the qualifications, limitations or restrictions thereof, as shall

not be inconsistent with law, this Article FOURTH or any amendment creating such series.

Each share of Common Stock shall be equal in all respects to every other share of the Common Stock. The Common Stock shall be subject to the express terms of the Preferred Stock and any series thereof.

2. Dividends on Preferred Stock.

No holder of outstanding shares of any series of the Preferred Stock shall be entitled to receive any dividends thereon other than the dividends provided therefor pursuant to paragraph 1 hereof.

3. Redemption and Repurchase of Preferred Stock.

If, on or before the redemption date with respect to any shares of any series of Preferred Stock that are subject to redemption, as fixed or determined pursuant to paragraph 1 hereof, this corporation shall deposit with a bank, trust company or other financial institution monies necessary for the redemption of such shares, then, notwithstanding that any certificate for such shares so redeemed shall not have been surrendered for cancellation, from and after such redemption date, all rights and preferences with respect to such shares so redeemed shall forthwith on such redemption date cease and terminate, except only the right of the holders thereof to receive, out of the monies so deposited, the amount payable upon redemption of such shares, without interest. Any such monies so deposited by this corporation and unclaimed at the end of six (6) years from such redemption date shall be repaid to this corporation upon its request, after which repayment the holders of the shares so called for redemption shall look only to this corporation for the payment thereof.

Nothing herein contained shall limit any legal right of this corporation to purchase or otherwise acquire any shares of the Preferred Stock to the extent permitted by law. All or any shares of Preferred Stock at any time redeemed, purchased or otherwise acquired by this corporation may thereafter, in the discretion of the Board of Directors, be reissued or otherwise disposed of at any time or from time to time, to the extent and in the manner now or hereafter permitted by law.

4. Dividends on Common Stock.

Subject to the rights and preferences of each series of Preferred Stock, as determined pursuant to paragraph 1 hereof, such dividends (payable in cash, stock or otherwise) as may be determined by the Board of Directors may be declared and paid on the Common Stock, but only out of funds legally available for the payment of such dividends.

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III-E.16

Request:

Provide copies of the summaries of the public utility's projected revenues, expenses and capital budgets for the FTY and the FPFTY.

Response:

Please reference National Fuel Exhibit A (FPFTY) which details information on the Company's projected revenue and expenses. National Fuel's fiscal year 2025 actual capital expenditures and fiscal year 2026 and 2027 capital budgets are shown below:

	Fiscal 2025 Actual	Fiscal 2026 Budget	Fiscal 2027 Budget
Production Plant	143,000	438,000	444,000
Transmission Plant	10,911,000	13,230,000	17,000,000
Distribution Plant	32,845,000	44,517,000	49,975,000
General Plant	11,502,000	10,047,000	9,739,000
Total	55,401,000	68,232,000	77,158,000

Prepared by or under the supervision of: Anthony Formato

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-E-Rate of Return
Delivered on January 28, 2026

III-E.17

Request:

Describe long-term debt reacquisition by issue by the public utility and the parent company FOR THE MOST RECENT FIVE-YEAR PERIOD as follows including all of the following:

III.E.17.a Reacquisition by issue by year.
III.E.17.b Total gain or loss on reacquisitions by issue by year.
III.E.17.c Accounting for gain or loss for income tax and book purposes.
III.E.17.d Proposed treatment of gain or loss on such reacquisition for ratemaking purposes.

Response:

Please reference 53.53.III.E.6 regarding National Fuel Gas Company reacquisition of long term debt by issue and the proposed treatment of gains or losses. Note that NFGDC did not reacquire any long-term debt over the most recent five-year period.

Prepared by or under the supervision of: James C. Welch

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-E-Rate of Return
Delivered on January 28, 2026

III-E.18

Request:

Provide a schedule showing the major components of claimed capitalization and the derivation of the weighted costs of capital to support the claim. Include a descriptive statement concerning the major elements of changes in claimed capitalization, cost rates and overall return from comparable historical data.

Response:

The major components of claimed capitalization and the derivation of the weighted costs of capital are provided in a table below. Please see 53.53.III-E.1, III-E.6 and Statements 10 and 11 for further detail on changes in claimed capitalization, cost rates and overall return from comparable historical data.

FPFTY 10/31/2027	**Capital Ratios**	**Cost**	**Weighted Cost**
Long-Term Debt	43.6%	5.58%	2.44%
Common Equity	56.4%	11.25%	6.34%
Weighted Average Cost			8.78%

Prepared by or under the supervision of: Joshua C. Nowak

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-E-Rate of Return
Delivered on January 28, 2026

III-E.19

Request:

Provide a schedule in the same format as the schedule provided in Filing Requirement as previously listed in E.18, except for the omission of the descriptive statement, for the most immediate comparable annual historical period prior to the HTY and the 2 calendar years most immediately preceding the rate of return claim period. Include capital ratios with and without short-term debt regardless of whether the capitalization claimed on the schedule provided in Filing Requirement as previously listed in E.18, includes short-term debt.

Response:

Please see 53.53.III-E.1, III-E.6 and Statements 10 and 11.

Prepared by or under the supervision of: Joshua C. Nowak

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-E-Rate of Return
Delivered on January 28, 2026

III-E.20

Request:

Provide the capitalization data requested in Filing Requirements as previously listed in E.18 and E.19, for the parent company and the consolidated group.

Response:

Please see 53.53.III-E.1, III-E.6 and Statements 10 and 11.

Prepared by or under the supervision of: Joshua C. Nowak

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-E-Rate of Return
Delivered on January 28, 2026

III-E.21

Request:

Provide the bond rating history for the public utility from the major credit rating agencies for the most recent 5 years.

Response:

The public utility is not rated by major credit rating agencies.

Prepared by or under the supervision of: James C. Welch

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-E-Rate of Return
Delivered on January 28, 2026

III-E.22

Request:

Provide the bond rating history for the parent company from the major credit rating agencies for the most recent 5 years if applicable.

Response:

Please see response to ROR-03 for bond rating history for the parent company.

Prepared by or under the supervision of: James C. Welch

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-E-Rate of Return
Delivered on January 28, 2026

III-E.23

Request:

Provide copies of each presentation and report made by management and securities analysts on the public utility's behalf, including presentations of financial projections, in the past 2 years.

Response:

NFGDC does not publish presentations and does not have any securities analyst coverage specific to that business. Please refer to the responses provided in ROR-06 and ROR-10 regarding presentations made by management and security analyst reports related to National Fuel Gas Company.

Prepared by or under the supervision of: James C. Welch

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-E-Rate of Return
Delivered on January 28, 2026

III-E.24

Request:

Provide copies of each presentation and report made by management and securities analysts on the parent company's behalf, including presentations of financial projections, in the past 2 years if applicable.

Response:

Please refer to the responses provided in ROR-06 and ROR-10 regarding presentations made by management and security analyst reports related to National Fuel Gas Company.

Prepared by or under the supervision of: James C. Welch

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-E-Rate of Return
Delivered on January 28, 2026

III-E.25

Request:

Provide a listing of all securities issuances for the public utility projected for the next 2 years following the end of the test year. Identify for each projected issuance all of the following:

III.E.25.a Date.
III.E.25.b Dollar amount.
III.E.25.c Type of security.
III.E.25.d Effective cost rate.

Response:

Please reference the Company's responses to 53.53.III.E.6 and 53.53.III.E.8 regarding anticipated company debt and equity issuances respectively for the next two years.

Prepared by or under the supervision of: James C. Welch

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-E-Rate of Return
Delivered on January 28, 2026

III-E.26

Request:

Provide a listing of all securities issuances for the parent company projected for the next 2 years following the end of the test year if applicable. The response shall identify for each projected issuance all of the following:

III.E.26.a Date.
III.E.26.b Dollar amount.
III.E.26.c Type of security.
III.E.26.d Effective cost rate.

Response:

There are no projected security issuances by the parent company for the 2 years following the FPFTY.

Prepared by or under the supervision of: James C. Welch

National Fuel Gas Distribution Corporation
Docket No. R-2026-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-E-Rate of Return
Delivered on January 28, 2026

III-E.27

Request:

Provide the cost RATE of long-term debt for the HTY and the 2 years immediately preceding the HTY BY OUTSTANDING ISSUE AND THE OVERALL WEIGHTED AVERAGE FOR ALL OUTSTANDING LONG-TERM DEBT. Identify any plan by the public utility to refinance high-cost long-term debt or preferred stock.

Response:

Please refer to tables on the following pages for the rate of long-term debt for the HTY and the 2 years immediately preceding the HTY. Please refer to the response to 53.53.III-E.6 regarding plans to refinance long term debt. The company does not have any preferred stock.

Prepared by or under the supervision of: James C. Welch

National Fuel Gas Distribution Corporation
Calculation of the Composite Interest Rate of Total Debt
Actual at September 30, 2023

Type	Amount Outstanding	Effective Cost Rate(1)	Annualized Cost	Composite Cost Rate
Medium-Term Notes				
7.375% Due 2025	$ 50,000,000	7.52%	$ 3,760,000	
3.95% Due 2027	$ 100,000,000	4.15%	4,150,000	
4.75% Due 2028	$ 125,000,000	4.96%	6,200,000	
2.95% Due 2031	50,000,000	3.06%	1,530,000	
5.50% Due 2026	150,000,000	5.80%	8,700,000	
Total Medium-Term Notes	$ 475,000,000		$ 24,340,000	5.12%
Committed Line of Credit Fee			634,214	0.13%
Total Long-Term Debt	$ 475,000,000		$ 24,974,214	5.26%
Short-Term Debt	$ 189,119,178 (2)	5.395% (3)	$ 10,202,738	
Total Debt	$ 664,119,178		$ 35,176,952	5.30%

Note: Excludes any amortization on Parent's issuance-related costs
(1) From page 5 of this Schedule
(2) Short-term debt based on average outstanding balance for 12 month period
(3) Short-term effective cost rate based on weighted average money pool rate for 12 month period

National Fuel Gas Distribution Corporation
Calculation of the Composite Interest Rate of Total Debt
Estimated at September 30, 2024

Type	Amount Outstanding		Effective Cost Rate(1)		Annualized Cost	Composite Cost Rate
Medium-Term Notes						
7.375% Due 2025	$ 50,000,000		7.52%		$ 3,760,000	
3.95% Due 2027	$ 100,000,000		4.15%		4,150,000	
4.75% Due 2028	$ 125,000,000		4.96%		6,200,000	
2.95% Due 2031	50,000,000		3.06%		1,530,000	
5.50% Due 2026	150,000,000		5.80%		8,700,000	
Total Medium-Term Notes	$ 475,000,000				$ 24,340,000	5.12%
Committed Line of Credit Fee					544,150	0.11%
Total Long-Term Debt	$ 475,000,000				$ 24,884,150	5.24%
Short-Term Debt	$ 123,873,770	(2)	6.380%	(3)	$ 7,903,523	
Total Debt	$ 598,873,770				$ 32,787,673	5.47%

Note: Excludes any amortization on Parent's issuance-related costs
(1) From page 5 of this Schedule
(2) Short-term debt based on average outstanding balance for 12 month period
(3) Short-term effective cost rate based on weighted average money pool rate for 12 month period

National Fuel Gas Distribution Corporation
Calculation of the Composite Interest Rate of Total Debt
Estimated at September 30, 2025

Type	Amount Outstanding	Effective Cost Rate(1)	Annualized Cost	Composite Cost Rate
Medium-Term Notes				
3.95% Due 2027	100,000,000	4.15%	4,150,000	
4.75% Due 2028	125,000,000	4.96%	6,200,000	
2.95% Due 2031	50,000,000	3.06%	1,530,000	
5.50% Due 2026	150,000,000	5.80%	8,700,000	
5.95% Due 2035	175,000,000	6.12%	10,710,000	
Total Medium-Term Notes	$ 600,000,000		$ 31,290,000	5.22%
Committed Line of Credit Fee			762,820	0.13%
Total Long-Term Debt	$ 600,000,000		$ 32,052,820	5.34%
Short-Term Debt	$ 179,579,178 (2)	5.581% (3)	$ 10,022,056	
Total Debt	$ 779,579,178		$ 42,074,876	5.40%

Note: Excludes any amortization on Parent's issuance-related costs
(1) From page 5 of this Schedule
(2) Short-term debt based on average outstanding balance for 12 month period
(3) Short-term effective cost rate based on weighted average money pool rate for 12 month period

National Fuel Gas Distribution Corporation
Calculation of the Effective Interest Rate of Long-Term Debt by Series

Series	Date of Issue	Date of Maturity	Term in Years	Principal Amount Issued	Premium or (Discount) at Issuance	Commission for Issuance	Issuance Expenses	Net Proceeds	Net Proceeds Ratio	Effective Cost Rate to Maturity (1)
Medium-Term Notes										
7.375% Due 2025	June 12, 1995	June 13, 2025	30	$50,000,000	-	(726,500)	(125,972)	$49,147,528	98.30%	7.52%
3.95% Due 2027	September 27, 2017	September 15, 2027	10	$100,000,000	(683,000)	(650,000)	(300,330)	$98,366,670	98.37%	4.15%
4.75% Due 2028	August 17, 2018	September 1, 2028	10	$125,000,000	(908,750)	(812,500)	(391,942)	$122,886,808	98.31%	4.96%
2.95% Due 2031	February 24, 2021	March 1, 2031	10	$50,000,000	(30,500)	(325,000)	(132,686)	$49,511,814	99.02%	3.06%
5.50% Due 2026	May 18, 2023	October 1, 2026	3.37	$150,000,000	(330,000)	(525,000)	(505,000)	$148,640,000	99.09%	5.80%
5.95% Due 2035	March 15, 2025	March 15, 2035	10	$175,000,000	(575,750)	(1,137,500)	(514,325)	$172,772,425	98.73%	6.12%

National Fuel Gas Company and Subsidiaries
Calculation of the Composite Interest Rate of Total Debt
Actual at September 30, 2023

Type	Amount Outstanding	Effective Cost Rate(1)	Annualized Cost	Composite Cost Rate
Medium-Term Notes				
7.375% Due 2025	$ 50,000,000	7.52%	$ 3,760,000	
5.20% Due 2025	$ 450,000,000	5.35%	24,075,000	
3.95% Due 2027	$ 300,000,000	4.15%	12,450,000	
4.75% Due 2028	$ 300,000,000	4.96%	14,880,000	
5.50% Due 2026	$ 500,000,000	5.79%	28,950,000	
2.95% Due 2031	$ 500,000,000	3.06%	15,300,000	
5.50% Due 2026	$ 300,000,000	5.80%	17,400,000	
Total Medium-Term Notes	$ 2,400,000,000		$ 116,815,000	4.87%
Committed Line of Credit Fee			3,204,449	0.13%
Net Premium and Issuance Expense Adjustments (2)				
1993 March	$ -			
2017 October	(4,027,977)			
2018 September	(5,930,529)			
Total Adjustments	$ (9,958,506)			
Annual Amortization of Premium (Pre-Tax) (3)				
1993 March			$ 15,324	
2017 October			704,700	
2018 September			946,524	
Reduction of Annualized Cost Resulting from Recovery of Annual Premium Amortization (4)				
1993 March			$ (22,154)	
2017 October			(150,771)	
2018 September			(202,325)	
			$ 1,291,298	
Total Long-Term Debt	$ 2,390,041,494		$ 121,310,747	5.08%
Short-Term Debt	$ 245,823,424 (5)	5.687% (6)	$ 13,979,504	
Total Debt	$ 2,635,864,918		$ 135,290,251	5.13%

National Fuel Gas Company and Subsidiaries
Calculation of the Composite Interest Rate of Total Debt
Actual at September 30, 2024

Type	Amount Outstanding	Effective Cost Rate(1)	Annualized Cost	Composite Cost Rate
Medium-Term Notes				
7.375% Due 2025	$ 50,000,000	7.52%	$ 3,760,000	
5.20% Due 2025	$ 450,000,000	5.35%	24,075,000	
3.95% Due 2027	$ 300,000,000	4.15%	12,450,000	
4.75% Due 2028	$ 300,000,000	4.96%	14,880,000	
5.50% Due 2026	$ 500,000,000	5.79%	28,950,000	
2.95% Due 2031	$ 500,000,000	3.06%	15,300,000	
5.50% Due 2026	$ 300,000,000	5.80%	17,400,000	
6.71% Due 2026	$ 300,000,000	6.71%	20,130,000	
Total Medium-Term Notes	$ 2,700,000,000		$ 136,945,000	5.07%
Committed Line of Credit Fee			3,093,062	0.11%
Net Premium and Issuance Expense Adjustments (7)				
2017 October	(3,041,534)			
2018 September	(4,744,423)			
Total Adjustments	$ (7,785,957)			
Annual Amortization of Premium (Pre-Tax) (3)				
2017 October			704,700	
2018 September			946,524	
Reduction of Annualized Cost Resulting from Recovery of Annual Premium Amortization (8)				
2017 October			(150,771)	
2018 September			(202,325)	
			$ 1,298,128	
Total Long-Term Debt	$ 2,692,214,043		$ 141,336,190	5.25%
Short-Term Debt	$ 186,266,530 (9)	6.098% (10)	$ 11,358,332	
Total Debt	$ 2,878,480,573		$ 152,694,522	5.30%

National Fuel Gas Company and Subsidiaries
Calculation of the Composite Interest Rate of Total Debt
Actual at September 30, 2025

Type	Amount Outstanding	Effective Cost Rate(1)	Annualized Cost	Composite Cost Rate
Medium-Term Notes				
3.95% Due 2027	$ 300,000,000	4.15%	12,450,000	
4.75% Due 2028	$ 300,000,000	4.96%	14,880,000	
2.95% Due 2031	$ 500,000,000	3.06%	15,300,000	
5.50% Due 2026	$ 300,000,000	5.80%	17,400,000	
6.71% Due 2026	$ 300,000,000	5.89%	17,670,000	
5.50% Due 2030	$ 500,000,000	5.71%	28,550,000	
5.95% Due 2035	$ 500,000,000	6.12%	30,600,000	
Total Medium-Term Notes	$ 2,700,000,000		$ 136,850,000	5.07%
Committed Line of Credit Fee			3,432,690	0.13%
Net Premium and Issuance Expense Adjustments (11)				
2017 October	$ (2,055,090)			
2018 September	(3,558,318)			
2025 March (30)	(4,438,395)			
2025 March (35)	(9,167,025)			
Total Adjustments	$ (19,218,828)			
Annual Amortization of Premium (Pre-Tax) (3)				
2017 October			704,700	
2018 September			946,524	
2025 March (30)			93,450	
2025 March (35)			191,625	
Reduction of Annualized Cost Resulting from Recovery of Annual Premium Amortization (12)				
2017 October			$ (206,443)	
2018 September			(292,246)	
2025 March (30)			(1,100)	
2025 March (35)			(2,442)	
			$ 1,434,068	
Total Long-Term Debt	$ 2,680,781,172		$ 141,716,758	5.29%
Short-Term Debt	$ 180,278,713 (13)	4.971% (14)	$ 8,961,921	
Total Debt	$ 2,861,059,885		$ 150,678,679	5.27%

National Fuel Gas Company and Subsidiaries
Calculation of the Composite Interest Rate of Total Debt

Notes:

(1) From page 16 of this Schedule

(2) Unamortized balances of pre-tax premium and issuance expenses at September 30, 2023 from page 10 of this Schedule

(3) Annual amortization of pre-tax premiums

(4) Annualized interest cost adjustment to reflect the impact of the annual amortization of pre-tax premiums at September 30, 2023

(5) Average short-term debt balance for the twelve months ended September 30, 2025

(6) Average short-term debt cost rate for the twelve months ended September 30, 2025

(7) Unamortized balances of pre-tax premium and issuance expenses at September 30, 2024 from page 10 of this Schedule

(8) Annualized interest cost adjustment to reflect the impact of the annual amortization of pre-tax premiums at September 30, 2024

(9) Estimated average short-term debt balance for the twelve months ended September 30, 2026

(10) Estimated average short-term debt cost rate for the twelve months ended September 30, 2026

(11) Unamortized balances of pre-tax premium and issuance expenses at September 30, 2025 from page 10 of this Schedule

(12) Annualized interest cost adjustment to reflect the impact of the annual amortization of pre-tax premiums at September 30, 2025

(13) Estimated average short-term debt balance for the twelve months ended October 31, 2027

(14) Estimated average short-term debt cost rate for the twelve months ended October 31, 2027

National Fuel Gas Company and Subsidiaries
Amortization of Capital Structure Adjustments for Ratemaking Purposes

						Actual At September 30, 2023			Projected At September 30, 2024			Projected At September 30, 2025		
		Base Year Adjustment	Months of Amort.	Monthly Amort.	Start Date	# of Mos.	Amount Amortized	Balance Outstanding	# of Mos.	Amount Amortized	Balance Outstanding	# of Mos.	Amount Amortized	Balance Outstanding
1)	1993 March	$1,016,313 (1)	360	$2,823	Mar-93	366	$1,016,313	$0	378	$1,016,313	$0	390	$1,016,313	$0
3)	2017 October	$9,864,433 (2)	120	$82,204	Oct-17	71	$5,836,456	$4,027,977	83	$6,822,899	$3,041,534	95	$7,809,343	$2,055,090
4)	2018 September	$11,861,058 (3)	120	$98,842	Sep-18	60	$5,930,529	$5,930,529	72	$7,116,635	$4,744,423	84	$8,302,741	$3,558,318
5)	2018 September	$4,931,550 (4)	60	$82,193	Apr-25	0	$0	$4,931,550	0	$0	$4,931,550	6	$493,155	$4,438,395
6)	2018 September	$9,649,500 (5)	120	$80,413	Apr-25	0	$0	$9,649,500	0	$0	$9,649,500	6	$482,475	$9,167,025
						Total		$24,539,556	Total		$22,367,007	Total		$19,218,828

Notes:
(1) From page 11 of this Schedule
(2) From page 12 of this Schedule
(3) From page 13 of this Schedule
(4) From page 14 of this Schedule
(5) From page 15 of this Schedule

National Fuel Gas Company and Subsidiaries
1993 (March) Base Year Refinancing Activity

Premiums Resulting From Refinancing		
9-1/2% due 2019	$	919,504
Total Pre-Tax Premiums	$	919,504
Expenses Resulting From Refinancing:		
7.395% Medium Term Note due 2023		
- Discount and Underwriters' Expense	$	85,260
- Issuance Expenses		11,549
Total Expenses	$	96,809
Adjustment to Capital Structure	$	1,016,313

National Fuel Gas Company and Subsidiaries
2017 (October) Base Year Refinancing Activity

Premiums Resulting From Refinancing	
6.50% due 2018	$ 7,047,000
Total Pre-Tax Premiums	$ 7,047,000
Expenses Resulting From Refinancing:	
3.95% Medium Term Note due 2027	
- Discount and Underwriters' Expense	$ 1,950,000
- Issuance Expenses	867,433
Total Expenses	$ 2,817,433
Adjustment to Capital Structure	$ 9,864,433

National Fuel Gas Company and Subsidiaries
2018 (September) Base Year Refinancing Activity

Premiums Resulting From Refinancing	
8.75% due 2019	$ 9,465,225
Total Pre-Tax Premiums	$ 9,465,225
Expenses Resulting From Refinancing:	
4.15% Medium Term Note due 2028	
- Discount and Underwriters' Expense	$ 1,625,000
- Issuance Expenses	770,833
Total Expenses	$ 2,395,833
Adjustment to Capital Structure	$ 11,861,058

National Fuel Gas Company and Subsidiaries
2025 (March 5-Year) Base Year Refinancing Activity

Premiums Resulting From Refinancing	
5.20% due 2025	$ 801,000
Total Pre-Tax Premiums	$ 801,000
Expenses Resulting From Refinancing:	
5.50% Medium Term Note due 2030	
- Discount and Underwriters' Expense	$ 2,808,000
- Issuance Expenses	1,322,550
Total Expenses	$ 4,130,550
Adjustment to Capital Structure	$ 4,931,550

National Fuel Gas Company and Subsidiaries
2025 (March 10-Year) Base Year Refinancing Activity

Premiums Resulting From Refinancing	
5.50% due 2026	$ 3,285,000
Total Pre-Tax Premiums	$ 3,285,000
Expenses Resulting From Refinancing:	
5.95% Medium Term Note due 2035	
- Discount and Underwriters' Expense	$ 4,895,000
- Issuance Expenses	1,469,500
Total Expenses	$ 6,364,500
Adjustment to Capital Structure	$ 9,649,500

National Fuel Gas Company and Subsidiaries
Calculation of the Effective Interest Rate of Long-Term Debt by Series

Series	Date of Issue	Date of Maturity	Term in Years	Principal Amount Issued	Premium or (Discount) at Issuance	Commission for Issuance	Issuance Expenses	Net Proceeds	Net Proceeds Ratio	Effective Cost Rate to Maturity
Medium-Term Notes										
7.375% Due 2025	June 12, 1995	June 13, 2025	30	$50,000,000	-	(726,500)	(125,972)	$49,147,528	98.30%	7.52%
5.20% Due 2025	June 22, 2015	July 15, 2025	10	$450,000,000	(1,413,000)	(2,925,000)	(1,033,494)	$444,628,506	98.81%	5.35%
3.95% Due 2027	September 27, 2017	September 15, 2027	10	$300,000,000	(2,049,000)	(1,950,000)	(900,991)	$295,100,009	98.37%	4.15%
4.75% Due 2028	August 17, 2018	September 1, 2028	10	$300,000,000	(2,181,000)	(1,950,000)	(940,661)	$294,928,339	98.31%	4.96%
5.50% Due 2026	June 3, 2020	January 15, 2026	5.7	$500,000,000	(2,410,000)	(3,000,000)	(1,586,104)	$493,003,896	98.60%	5.79%
2.95% Due 2031	February 24, 2021	March 1, 2031	10	$500,000,000	(305,000)	(3,250,000)	(1,326,857)	$495,118,143	99.02%	3.06%
5.50% Due 2026	May 18, 2023	October 1, 2026	3.4	$300,000,000	(660,000)	(1,050,000)	(1,010,000)	$297,280,000	99.09%	5.80%
6.71% Due 2026	April 14, 2024	February 14, 2026 (1)	2	$300,000,000	-	-	-	$300,000,000	100.00%	6.71%
5.50% Due 2030	March 15, 2025	March 15, 2030	5	$500,000,000	(120,000)	(3,000,000)	(1,469,500)	$495,410,500	99.08%	5.71%
5.95% Due 2035	March 15, 2025	March 15, 2035	10	$500,000,000	(1,645,000)	(3,250,000)	(1,469,500)	$493,635,500	98.73%	6.12%

(1) Term loan currently due on February 14, 2026, but assuming maturity is extended until October 1, 2026; 2024 interest rate shown in table

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III-E.28

Request:

Provide a listing of common equity infusions from the parent company to the public utility during the HTY if applicable. Indicate any common equity infusions made or anticipated in the FTY and anticipated in the FPFTY calculations. Identify date, dollar amount and intended use of the funds for each infusion.

Response:

The following table summarizes equity infusions from the parent company to the public utility with no change in shares during the HTY and anticipated equity infusions during the FTY and FPFTY based on the current forecast. Equity infusions from NFG to NFGDC are intended to be used in conjunction with long term debt infusions to term out short term debt balances related to the company's capital spending program.

Date	Period	Infusion Amount ($ Millions)
August 1, 2025	HTY	$50
April 2026	FTY	$50
November 2026	FPFTY	$50
August 2027	FPFTY	$50

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III-E.29

Request:

Identify BY DATE AND AMOUNT the DIVIDENDS ON common [dividend payments] STOCK PAID BY THE PUBLIC UTILITY to the parent company for the HTY and the 2 years immediately preceding the HTY if applicable.

Response:

See the table below for dates and amounts of dividends paid to NFGC by NFGDC.

Date	Dividend Payable to Parent
Thursday October 13, 2022	$11,600,000
Thursday January 12, 2023	$11,600,000
Thursday April 13, 2023	$11,600,000
Thursday July, 13, 2023	$11,600,000
Thursday October 12, 2023	$11,600,000
Thursday Jan 11, 2024	$11,600,000
Friday April 12, 2024	$11,600,000
Friday July 12, 2024	$11,600,000
Friday October 11, 2024	$13,300,000
Tuesday January 14, 2025	$13,300,000
Monday Apr. 14, 2025	$13,300,000
Monday July 14, 2025	$14,500,000

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III-E.30

Request:

Identify the public utility's capital structure targets (percentages of capital types) for the FTY and the FPFTY. Explain the basis for the capital structure targets. Provide a schedule showing targets and actuals for the HTY and the 2 years immediately preceding the HTY.

Response:

The table below provides the historical and forecasted capital structure for National Fuel Distribution Corp. (NFGDC). The capital structure presented is consistent with the forecasted financials provided as part of this proceeding. Please refer to testimony provided by witness Nowak regarding NFGDC's capital structure targets along with an explanation of the basis for these targets.

National Fuel Gas Distribution Corp. (NFGDC)

			HTY	FTY	FPFTY
	9/30/2023	9/30/2024	9/30/2025	9/30/2026	10/31/2027
Capital Structure					
Long Term Debt	475,000	475,000	600,000	600,000	750,000
Common Equity	672,744	686,424	768,205	837,483	968,511
Total Capitalization	1,147,744	1,161,424	1,368,205	1,437,483	1,718,511
Capital Ratios					
Long Term Debt	41.4%	40.9%	43.9%	41.7%	43.6%
Equity	58.6%	59.1%	56.1%	58.3%	56.4%
Total Capitalization	100.0%	100.0%	100.0%	100.0%	100.0%

Note: Common Equity excludes Accumulated Other Comprehensive Income

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III-E.31

Request:

Identify the parent company's capital structure targets (percentages of capital types) for the FTY and the FPFTY if applicable. Explain the basis for the capital structure targets. Provide a schedule showing targets and actuals for the HTY and the 2 years immediately preceding the HTY.

Response:

The table below provides the historical and forecasted capital structure for National Fuel Gas Company (NFGC). The capital structure presented is consistent with the forecasted financials provided as part of this proceeding. Please refer to testimony provided by witness Nowak regarding NFGC's capital structure targets along with an explanation of the basis for these targets.

National Fuel Gas Company (NFG)					
			HTY	FTY	FPFTY
	9/30/2023	9/30/2024	9/30/2025	9/30/2026	10/31/2027
Capital Structure					
Long Term Debt	2,400,000	2,700,000	2,700,000	2,700,000	2,600,000
Common Equity	3,018,436	2,863,819	3,153,826	3,683,054	4,324,107
Total Capitalization	5,418,436	5,563,819	5,853,826	6,383,054	6,924,107
Capital Ratios					
Long Term Debt	44.3%	48.5%	46.1%	42.3%	37.5%
Equity	55.7%	51.5%	53.9%	57.7%	62.5%
Total Capitalization	100.0%	100.0%	100.0%	100.0%	100.0%

Note: Common Equity excludes Accumulated Other Comprehensive Income

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III-E.32

Request:

For each month of the most recent 24 months, provide all of the following public utility's:

III.E.32.a Short-term debt balance.
III.E.32.b Short-term debt interest rate.
III.E.32.c Balance of CWIP.
III.E.32.d Balance of CWIP which is eligible for AFUDC accrual.

Response:

Please reference the Company's response to ROR-016.

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III-E.33

Request:

Identify debt, other than instruments traded in public markets, owed to shareholders, corporate officers, members of the board of directors, affiliated companies, parent company or subsidiary companies.

Response:

Please reference the Company's response to ROR-19.

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III-E.34

Request:

Provide a summary statement of all stock dividends, splits or par value changes during the 2-year calendar period immediately preceding the current base rate case filing.

Response:

The requested information is not applicable. There have been no stock dividends, splits, or par value changes during the last two years.

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III-E.35

Request:

Provide a schedule of purchases or retirements of stock of the public utility or its parent company during the 2-year calendar period immediately preceding the current base rate case filing. Provide the details of any planned purchases or retirements of stock of the public utility or its parent company in the FTY and the FPFTY.

Response:

Please see table on the following pages showing the share repurchases for the parent company and utility for the preceding two years

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	Parent Company	
	Shares Repurchased as part of Repurchase Program	Shares Repurchased as part of Employee Benefits
Sep-23		13,493
Oct-23		10,443
Nov-23		11,134
Dec-23		88,473
Jan-24		15,968
Feb-24		15,620
Mar-24	96,133	14,322
Apr-24	125,135	14,399
May-24	34,722	12,997
Jun-24	270,662	15,476
Jul-24	266,727	13,448
Aug-24	192,781	12,807
Sep-24	160,099	13,515
Oct-24	193,352	12,525
Nov-24	168,518	12,387
Dec-24	186,726	77,241
Jan-25	77,220	12,417
Feb-25	67,812	11,221
Mar-25	81,140	10,601
Apr-25	53,952	10,725
May-25		11,376
Jun-25		11,376
Jul-25		9,923
Aug-25		9,733
Sep-25		15,996

In April 2025 the parent company suspended the share repurchase program. Going forward we would anticipate conducting repurchases in the normal course of operations to support employee benefit programs as we have done previously.

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III-E.36

Request:

If the rate of return claim is based on the use of the capital structure or capital costs of the parent company or the consolidated group, state and support the reasons for such a claim. If applicable, explain why a hypothetical or non-actual capital structure is being employed.

Response:

NFGDC's rate of return claim is not based on the parent company or consolidated group capital structure or capital costs.

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National Fuel Gas Distribution Corporation
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III-F.1

Request:

Provide the most current available balance sheet for the public utility, the parent company and the consolidated group.

Response:

Please see National Fuel Gas Company and NFGDC balance sheets on the following pages.

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(III-F.1 cont'd)

National Fuel Gas Company
Consolidated Balance Sheet
($000 OMITTED)
FY 2025

Total Gross Plant	**15,406,329**
Total Accumulated Depreciation	(7,693,687)
Net Plant	**7,712,641**
Cash	12,355
Temp Cash Investments	30,811
Notes Receivable Intercompany	-
Notes Receivable: Current Portion of LTD at Subs	-
Hedging Collateral Deposits	-
Accounts Receivable Intercompany	-
Accounts Receivable	197,901
Allowance for Doubtful Accounts	(17,099)
Unbilled Utility Revenue Receivable	16,219
Dividends Receivable Intercompany	-
Materials and Supplies	50,545
Gas Storage Inventory	33,468
Unrecovered Gas Cost	5,769
Prepaid Expenses and Other Current Assets	80,759
Deferred Tax Asset	-
Total Current Assets	**410,728**
Investment in Subsidiaries	-
Recoverable Future Taxes	89,247
Unamortized Debt Expense	6,236
Regulatory Assets	135,485
Other Deferred Charges	73,941
Other Investments	68,346
Equity Investments	-
Goodwill	5,476
Notes Receivable Intercompany LTD	-
Other Non Current Assets	177,614
Long Term Notes Receivable	-
Security Deposit to Affiliate	-
Intra Segment Security Deposit Receivable	-
FMV of Deriv Financial Instruments Asset	39,388
Total Non-Current Assets	**595,735**
Total Assets	**8,719,104**

Preferred Stock	-
Common Stock & Paid in Capital	1,141,297
Retained Earnings	2,012,529
Accumulated Other Comprehensive Income (Subs)	(59,222)
Total Common Stock Equity	**3,094,604**
Long-term portion of Total LTD	2,400,000
Unamortized Debt Expense Total LTD	17,139
Long-Term Debt, Net of Unamort Disc & Debt Issue Costs	2,382,861
Total Capitalization	**5,477,465**
Notes Payable	150,200
Notes Payable Interco	-
Notes Payable Intercompany	-
Notes Payable (Distribution to NFG)	-
Current Portion of Total LTD	300,000
Accounts Payable	184,046
Amounts Payable to Customer	968
Dividends Payable	48,353
Accounts Payable Intercompany	-
Dividends Payable Intercompany	-
Customer Advances	17,188
Customer Deposits	29,853
Reserve for Gas Replacement	-
Accrued State Taxes Payable	0
Accrued Federal Taxes Payable	-
Accrued Other Taxes Payable	318
FMV of Deriv Financial Instruments Credit	6,074
Other Current Liabilities	0
Accrued Liabilities	174,371
Total Accrued Interest	14,393
Total Current Liabilities	**925,764**
Total Accumulated Deferred Income Taxes	1,225,262
Taxes Refundable to Customer	306,335
S. Georgia Customer Refund Payable	-
Effective Tax Rate Chg Customer Ref Payable	-
ARAM Customer Refund Payable	-
Unamortized Investment Tax Credit	0
Cost of Removal Regulatory Liability	307,659
S. Georgia Regulatory Liability	-
ARAM Regulatory Liability	-
Other Regulatory Liabilities	121,944
Pension and OPEB Liability	5,251
Intra Segment Security Deposit Liability	-
Other Deferred Credit	112,637
Total Capitalization and Liabilities	**8,719,104**

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(III-F.1 cont'd)

National Fuel Gas Distribution Company
FY 2025 - Balance Sheet
($000)

Total Gross Plant	**2,863,782**
CWIP	49,838
Total Accumulated Depreciation	(889,323)
Net Plant	**1,974,459**
Cash	6,239
Temp Cash Investments	8,643
Accounts Receivable Intercompany	9,698
Accounts Receivable	64,952
Allowance for Doubtful Accounts	(16,521)
Unbilled Utility Revenue Receivable	16,219
Dividends Receivable Intercompany	
Materials and Supplies	18,927
Gas Storage Inventory	33,468
Unrecovered Gas Cost	5,769
Prepaid Expenses and Other Current Asse	73,044
Deferred Tax Asset	-
Total Current Assets	**220,439**
Investment in Subsidiaries	-
Recoverable Future Taxes	82,609
Unamortized Debt Expense	1,898
Regulatory Assets	94,665
Other Deferred Charges	11,235
Other Investments	4,126
Equity Investments	-
Goodwill	-
Notes Receivable Intercompany LTD	-
Other Non Current Assets	144,857
Long Term Notes Receivable	-
Security Deposit to Affiliate	-
FMV of Deriv Financial Instruments Asset	-
Total Non-Current Assets	**$339,390**
Total Assets	**$2,534,289**

Common Stock & Paid in Capital	281,749
Retained Earnings	486,457
Accumulated Other Comprehensive Incom	(12,750)
Total Common Stock Equity	**755,456**
Long-term portion of Total LTD	600,000
Total Capitalization	**1,355,456**
Notes Payable Interco	191,700
Accounts Payable	41,237
Amounts Payable to Customer	968
Accounts Payable Intercompany	22,915
Dividends Payable Intercompany	14,500
Customer Advances	17,188
Customer Deposits	17,186
Accrued Other Taxes Payable	(382)
FMV of Deriv Financial Instruments Credit	71
Accrued Liabilities	37,683
Total Accrued Interest	5,656
Total Current Liabilities	**348,722**
Total Accumulated Deferred Income Taxes	351,107
Taxes Refundable to Customer	138,569
S. Georgia Customer Refund Payable	-
Effective Tax Rate Chg Customer Ref Payabl	-
ARAM Customer Refund Payable	-
Unamortized Investment Tax Credit	0
Cost of Removal Regulatory Liability	187,786
S. Georgia Regulatory Liability	-
ARAM Regulatory Liability	-
Other Regulatory Liabilities	121,592
Pension and OPEB Liability	(18,545)
Asset Retirement Obligation	15,887
Security Deposit Affiliate	-
Other Deferred Credit	33,715
Total Deferred Credits	**830,111**
Total Capitalization and Liabilities	**2,534,289**

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III-F.2

Request:

Provide a comparative balance sheet for the HTY and the year immediately preceding the HTY.

Response:

See Attachment III.F.2 for a comparative balance sheet of National Fuel Gas Distribution Corporation at September 30, 2024 and 2025. The balance sheet provided is for the entirety of National Fuel Gas Distribution Corporation, including both the Pennsylvania and New York Divisions. Balance sheets are not maintained separately for the two divisions.

Prepared by or under the supervision of: Michael J. Maggioli

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
BALANCE SHEET

Assets and Other Debits

		September 30, 2024	September 30, 2025
	Utility Plant		
101	Utility Plant	$ 2,656,876,033	$ 2,812,782,009
106	Completed Construction Not Classified - Gas	-	-
107	Construction Work in Progress	50,514,181	49,837,690
		2,707,390,213	2,862,619,699
108	Accumulated Provision for Depreciation, Depletion and Amortization - (Cr.)	(1,045,527,118)	(1,087,601,865)
111	Provision for Depletion - Natural Gas Land	-	-
	Total Utility Plant	1,661,863,095	1,775,017,835
	Other Property and Investments		
121	Non-Utility Property	1,162,034	1,162,034
122	Accumulated Provision for Depreciation and Amortization - (Cr.)	(19,397)	(19,397)
124	Other Investments	10,663,607	4,132,720
128	Other Special Funds	140,274,933	126,929,282
	Total Other Property and Investments	152,081,177	132,204,638
	Current and Accrued Assets		
131	Cash	3,902,478	6,081,595
132	Interest Special Deposits	-	-
135	Working Funds	158,800	157,600
136	Temporary Cash Investments	7,546,635	8,642,762
141	Notes Receivable	1,560,979	1,316,802
142	Customer Accounts Receivable	39,933,193	38,255,504
143	Other Accounts Receivable	7,588,689	8,192,059
144	Accumulated Provision for Uncollectible Accts. - Cr.	(25,615,867)	(16,520,999)
146	Accounts Receivable from Assoc. Companies	6,344,846	9,698,072
154	Plant Materials and Operating Supplies	17,452,238	18,492,413
155	Merchandise	-	-
163	Stores Expense Undistributed	616,906	434,942
164	Gas Stored Underground - Current	34,965,144	33,467,810
165	Prepayments	11,705,871	12,119,197
171	Interest and Dividends Receivable	-	-
173	Accrued Utility Revenue	15,521,216	16,218,916
175	Derivative Instrument Assets	38,188	-
	Total Current and Accrued Assets	121,719,316	136,556,673
	Deferred Debits		
182	Other Regulatory Assets	180,441,558	205,852,856
183	Other Preliminary Survey and Invest.	4,013,333	5,969,477
184	Clearing Accounts	(7,942,815)	(8,094,919)
186	Miscellaneous Deferred Debits	(2,734,850)	446,736
188	Research, Development & Demonstration Expenditures	- 3,191,437	- 1,678,072
189	Loss on Reacquired Debt	2,622,022	1,898,412
190	Accumulated Deferred Income Taxes	-	-
191	Unrecovered Purchased Gas Costs	(42,290,745)	5,769,456
	Total Deferred Debits	137,299,940	213,520,090
	Total Assets and Other Debits	$ 2,072,963,528	$ 2,257,299,235

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
BALANCE SHEET

	Liabilities and Other Credits	September 30, 2024	September 30, 2025
	Proprietary Capital		
201	Common Stock Issued	$ 59,170,600	$ 59,170,600
207	Premium on Capital Stock	68,500	68,500
208	Donations Received from Stockholders	168,377,683	222,509,559
216	Unappropriated Earned Surplus	434,115,972	461,765,336
219	Other Comp Income (Loss)	(10,096,681)	(12,749,624)
439	Adjustments to Retained Earn	24,693,289	24,693,289
	Total Proprietary Capital	676,329,364	755,457,661
	Long Term Debt		
223	Advances from Associated Companies	425,000,000	600,000,000
224	Other Long-Term Debt	-	-
	Total Long Term Debt	425,000,000	600,000,000
	Current and Accrued Liabilities		
228.2	Accum. Provision for Injuries & Damages	2,631,858	2,470,478
228.3	Accum. Provision for Pension and Benefits	(24,001,692)	(28,834,363)
229	Accum. Provision for Rate Refunds	370,509	247,006
230	Asset Retirement Obligations	14,933,097	15,887,152
232	Accounts Payable	39,464,578	39,775,844
233	Notes Payable to Associated Companies	267,300,000	191,700,000
234	Accounts Payable to Associated Companies	31,096,900	28,571,422
235	Customer Deposits	20,166,929	16,435,696
236	Taxes Accrued	(26,275,911)	(30,659,857)
237	Interest Accrued	-	-
238	Dividends Declared	13,300,000	14,500,000
241	Tax Collections Payable	(1,688,501)	1,459,434
242	Miscellaneous Current and Accrued Liabilities	21,763,832	25,225,316
244	Derivative Instrument Liabilities	8,895	70,993
	Total Current and Accrued Liabilities	359,070,495	276,849,121
	Deferred Credits and Resources		
252	Customer Advances for Construction	616,723	557,409
253	Other Deferred Credits	6,887,814	9,254,799
254	Deferred FASB 109 Liability	301,336,304	264,073,544
255	Accumulated Deferred Investment Tax Credit	3	3
263	Deferred Compensation Plan Liability	-	-
		308,840,844	273,885,756
	Accumulated Deferred Income Taxes		
282	Liberalized Depreciation	265,768,622	276,954,917
283	Other	37,954,203	74,151,782
	Total Deferred Credits	303,722,824	351,106,698
	Total Liabilities and Other Credits	$ 2,072,963,528	$ 2,257,299,235

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III-F.3

Request:

Provide a detail of other physical property, investments in affiliated companies, and other investments for the HTY. Provide a schedule showing any anticipated changes for the FTY and the FPFTY, if applicable.

Response:
Major items included in Account 121 - Non-Utility property and Account 124 - Other Investments for National Fuel Gas Distribution Corporation at September 30, 2025, are detailed

ACCOUNT 121 - Non-Utility Property (New York Jurisdiction only; none in Pennsylvania Jurisdiction)	$1,162,034
in the following towns, villages and cities within New York State; Amherst, Andover, Belmont, Boston, Buffalo, Clarksville, Chautauqua, Evans, Grand Island, Genesee, Hamburg, Hanover, Lancaster, North Collins, North Tonawanda, Olean, Wellsville and Wheatfield.	

There are no anticipated changes to the Non-Utility Property account for the FTY and FPFTY, as this balance has historically remained unchanged.

ACCOUNT 124 - Other Investments (Pennsylvania Jurisdiction only; none in New York Jurisdiction)	$4,132,720
Balance includes shares of MetWest Low Duration Bond Fund held by Grantor Trust	

The Other Investments account reflects market activity and transactions within a grantor trust, including the sale of shares. Due to the nature of these activities, future balances cannot be reasonably projected for the FTY and FPFTY.

Prepared by or under the supervision of: Michael J. Maggioli

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III-F.4

Request:

Supply the amounts and purpose of special cash accounts of all types, including any of the following:

III.F.4.a Interest and dividend special deposits.
III.F.4.b Working funds other than general operating cash accounts.
III.F.4.c Other special cash accounts and amounts (e.g., temporary cash investments).

Response:

The amounts and purpose of Special Cash Accounts for National Fuel Distribution Corporation at September 30, 2025 are as follows:

III.F.4.a
No interest or dividend special deposit cash accounts.

III.F.4.b
Account 135 – Working Fuds (Total Corporation) $ 157,600.00
The balance is comprised of petty cash and working funds for use by commercial offices and various operating departments. Funds are used for small business expenses.

III.F.4.c
Account 136 – Temporary Cash Investments (Total Corporation) $ 8,642,762.15
The balance is largely composed of funds held in a grantor trust that are being used to refund overcollected other post-employment benefit (OPEB) expenses to Pennsylvania customers pursuant to a tariff supplement that went into effect on October 1, 2021.

Prepared by or under the supervision of: Michael J. Maggioli

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III-F.5

Request:

Describe the nature, origin and amounts of notes receivable, accounts receivable and accounts payable to and from affiliates, and any other receivables or payables, other than customer accounts, which appear on the HTY balance sheet. Identify amounts that are greater than 15% of total receivables and payables respectively. Do not net receivables and payables unless there is a master agreement between the public utility and the third party that permits the netting of accounts receivable and accounts payable.

Response:

Account 143 - Other Accoutns Receivable (National Fuel Gas Distribution Corporation (Pennsylvania Division) at September 30, 2025)

The account balance consists of the following:

			% of total AR
Gas Line Hits		$ 482,670	46%
Reimbursable Work Billings		320,656	30%
Miscellaneous Receiveables			
Various Contractors	(104,063)		
Other	9,502	(94,561)	
Total Account 143		$ 708,765	

Account 146 - Accounts Receiveable from Associated Companies (National Fuel Gas Distribution Corporation (Pennsylvania Division) at September 30, 2025)

The account balance consists of the following:

		% of total AR
National Fuel Gas Supply Corporation	$ 231,666	22%
National Fuel Gas Midstream Company, LLC	96,730	
Empire Pipeline, Inc.	5,427	
National Fuel Gas Company	5,132	
Seneca Resources Company, LLC	4,055	
Total Account 146	$ 343,010	

Account 232 - Accounts Payable (National Fuel Gas Distribution Corporation (Pennsylvania Division) at September 30, 2025)

The account balance consists of the following:

		% of total AP
Purchase of Receivables Liabilities	$ (111,007,438)	86%
Accounts Payable to Vendors	(7,510,565)	
Gas Purchases	(3,567,350)	
Construction Retainage	(1,234,348)	
Payroll Liabilities	(569,821)	
Employee Related Liabilities	(128,145)	
Tax Liabilities (benefit)	320,288	
Total Account 234	$ (123,697,379)	

Account 234 - Accounts Payable from Associated Companies (National Fuel Gas Distribution Corporation (Pennsylvania Division) at September 30, 2025)

The account balance consists of the following:

National Fuel Gas Supply Corporation	$ (4,674,110)
National Fuel Gas Company	(221,595)
National Fuel Gas Midstream Company, LLC	(6,203)
Total Account 234	$ (4,901,907)

Prepared by or under the supervision of: Michael J. Maggioli

National Fuel Gas Distribution Corporation
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III-F.6

Request:

Provide the amount of accumulated reserve, method and rate of accrual, amounts accrued, and amounts written-off for uncollectible accounts in the HTY and the 2 years immediately preceding the HTY.

Response:

Account 144 - Accumulated Provision for Uncollectible Accounts
Accruals, Write-Offs & Recoveries for the Twelve Months Ended
September 30, 2023, 2024, and 2025

National Fuel Gas Distribution Corporation - PA Rate Jurisdiction

Period Ending	Beginning Balance	Accruals	Write-Offs	Recoveries & Other	Ending Balance
9/30/23	5,525,782	3,572,047	(2,963,333)	403,028	6,537,523
9/30/24	6,537,523	3,096,597	(4,420,277)	223,226	5,437,069
9/30/25	5,437,069	4,395,579	(6,213,281)	273,773	3,893,141

The allowance method is used for book purposes. Each of the years shown are actual per book amounts. The accrual is based upon Management's analysis of receivables.

The monthly accrual rate is based upon the estimated percentage of each month's sales to estimated annual sales. Uncollectible account write-offs are made after an unpaid final bill is at least twelve months old.

Prepared by or under the supervision of: Michael J. Maggioli

National Fuel Gas Distribution Corporation
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III-F.7

Request:

Provide a list of prepayments not otherwise identified elsewhere in response to the reporting requirement in connection with rate base.

Response:

ACCOUNT 165 - Prepayments
National Fuel Gas Distribution Corporation at September 30, 2025

Prepaid Taxes Balance consists of the unamortized portion of property tax assessments.	$	5,680,126
Prepaid Insurance Balance represents unamortized portion of insurance premiums which are written-off over the period of insurance coverage.		2,104,615
Prepaid Software Balance represents unamortized portion of prepaid maintenance expenses for Peoplesoft, SAP, Microsoft, Outsystems, Checkpoint, Oracle and XBRL.		2,024,174
State of New York Public Service Commission (PSC) Balance represents unamortized portion of general New York Public Service Comission assessment.		1,543,484
Pennsylvania Public Utility Commission (PUC) Balance represents unamortized portion of general assessment.		731,466
Miscellaneous Prepaids Balance represents prepaid postage meter expenses and other prepaid expenses.		35,331
Total Account 165 - Prepayments	$	12,119,197

Prepared by or under the supervision of: Michael J. Maggioli

National Fuel Gas Distribution Corporation
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III-F.8

Request:

Provide all of the following for each deferred asset and deferred liability on the HTY balance sheet:

III.F.8.a	Description of each deferral.
III.F.8.b	Date of origin for each deferral.
III.F.8.c	Account name and number.
III.F.8.d	Reference to Commission or other regulatory authority approval, including docket number(s).
III.F.8.e	Amount contained on the balance sheet for each individual deferral and corresponding amount charged to operations for the HTY.
III.F.8.f	Disposition policy (for example, method of determining yearly amortization).
III.F.8.g	Anticipated changes to each account through THE end of the FPFTY.

Response:

Response to Request III.F.8 is included in the attached document (page 2 of 2).

Prepared by or under the supervision of: Michael J. Maggioli

III.F.8.a Description	III.F.8.b Date of Origin	III.F.8.c USoA Account Number	III.F.8.c USoA Account Name	III.F.8.d Approval Reference (Docket/Order)	III.F.8.e HTY Balance ($)	III.F.8.f Disposition Policy	III.F.8.g FTY Amortization ($)	III.F.8.g FPFTY Amortization ($)
Other regulatory assets; regulatory asset corresponding to flow-through of temporary differences	1	182303	Deferred Tax Asset – FASB 109	N/A	$ 68,298,521.44	N/A	N/A	N/A
Regulatory Asset – Deferred OPEB	1	182319	Regulatory Asset – Deferred OPEB	N/A	$ (44,750,930.68)	3	3	3
Regulatory Asset – Pension Costs	1	182325	Regulatory Asset – Pension Costs	N/A	$ (17,842,904.00)	3	3	3
Regulatory Asset – PA GTI Delta Fund	11/2006	182346	Regulatory Asset – PA GTI Delta Fund	R-2022-3035730	$ (995,082.56)	Per order; Expenditure dependent	$ 526,466.00	$ 526,467.00
Regulatory Asset – FAS 158 Adjustment Pension	1	182393	Regulatory Asset – FAS 158 Adjustment Pension	N/A	$ 33,319,174.00	3	3	3
Regulatory Asset – FAS 158 Adjustment ERP	1	182394	Regulatory Asset – FAS 158 Adjustment ERP	N/A	$ (2,143,638.00)	3	3	3
Regulatory Asset – FAS 158 Adjustment TopHat	1	182395	Regulatory Asset – FAS 158 Adjustment TopHat	N/A	$ 235,998.00	3	3	3
Regulatory Asset – INT EXP MGC PGC	2	182602	Regulatory Asset – INT EXP MGC PGC	PGC costs approved annually through 1307(f) proceeding	$ 18,390.67	PGC reconciliation	PGC reconciliation	PGC reconciliation
Regulatory Asset – Int Exp CFCTR Storage	2	182603	Regulatory Asset – Int Exp CFCTR Storage	PGC costs approved annually through 1307(f) proceeding	$ (47,119.18)	PGC reconciliation	PGC reconciliation	PGC reconciliation
Regulatory Asset – Supplier Refund PGC	2	182604	Regulatory Asset – Supplier Refund PGC	PGC costs approved annually through 1307(f) proceeding	$ 33,110.87	PGC reconciliation	PGC reconciliation	PGC reconciliation
Regulatory Asset – Supplier Refund Int Exp PGC	2	182605	Regulatory Asset – Supplier Refund Int Exp PGC	PGC costs approved annually through 1307(f) proceeding	$ (22,710.01)	PGC reconciliation	PGC reconciliation	PGC reconciliation
Regulatory Asset – PA LIRA Rider Reconciliation	2	182606	Regulatory Asset – PA LIRA Rider Reconciliation	NA	$ 64,560.74	3	3	3
Regulatory Asset – AM Arrangement Deferral	1	182933	Regulatory Asset – AM Arrangement Deferral	NA	$ 28,277.49	3	3	3
Regulatory Asset – Deferred Fringe Benefit OPEB	10/2021	182934	Regulatory Asset – Deferred Fringe Benefit OPEB	R-2021-3027406	$ (7,355,658.04)	5	5	5
Regulatory Asset – OPEB Bill Credit	10/2021	182935	Regulatory Asset – OPEB Bill Credit	R-2021-3027406	$ (483,650.00)	3	3	3
Regulatory Asset – OPEB 5-Year Surcredit	10/2021	182936	Regulatory Asset – OPEB 5-Year Surcredit	R-2021-3027406	$ (7,666,290.17)	Refund/offset mechanism; Proposed extention included in current case	$ 5,837,500.00	$ 5,837,500.00
Other Misc Def Debit	1	186038	Other Misc Def Debit	NA	$ 177,476.40	Amortize over life of new line of credit	$ 50,479.16	$ 50,479.16
Deferred EPM Cloud Forecast	1	186064	Deferred EPM Cloud Forecast	NA	$ 75,749.48	Amortize over software life	$ 20,199.88	$ 20,199.88
Deferred Environmental Software	1	186065	Deferred Environmental Software	NA	$ 64,936.01	NA	NA	NA
Reimbursable Work	1	186080	Reimbursable Work	NA	$ 666,029.04	NA	NA	NA
Regulatory Asset – LIURP Program Deferral	1	186750	Regulatory Asset – LIURP Program Deferral	NA	$ (1,951,331.21)	3	3	3
Regulatory Asset – PA Delta Funds Field Support	1	188018	Regulatory Asset – PA Delta Funds Field Support	NA	$ 4,574.89	3	3	3
Regulatory Asset – Loss-Reacquired Debt	1	189000	Regulatory Asset – Loss-Reacquired Debt	NA	$ 576,457.61	3	3	3
Regulatory Asset – Deferred Gas Cost Unbilled – Retail	2	191140	Regulatory Asset – Deferred Gas Cost Unbilled – Retail	PGC costs approved annually through 1307(f) proceeding	$ (1,394,380.45)	PGC reconciliation	PGC reconciliation	PGC reconciliation
Regulatory Asset – PAD MGC PGC	2	191220	Regulatory Asset – PAD MGC PGC	PGC costs approved annually through 1307(f) proceeding	$ 2,342,640.82	PGC reconciliation	PGC reconciliation	PGC reconciliation
Regulatory Liability – Def FASB 109	1	254001	Regulatory Liability – Def FASB 109	N/A	$ 3,975,964.23	3	3	3
Regulatory Liability – Def FASB 109 ARAM (Protected EDIT)	1	254005	Regulatory Liability – Def FASB 109 ARAM (Protected EDIT)	N/A	$ (22,887,501.00)	3	3	3
Regulatory Liability – Def FASB 109 Unprotected	1	254007	Regulatory Liability – Def FASB 109 Unprotected	N/A	$ 2,063,866.00	3	3	3
Regulatory Liability – ARAM/RSG Gross Up	3	254008	Regulatory Liability – ARAM/RSG Gross Up	N/A	$ 2,510,065.79	3	3	3
Regulatory Liability – Unprotected Gross Up	3	254009	Regulatory Liability – Unprotected Gross Up	N/A	$ (2,298,601.93)	3	3	3
Regulatory Liability – PA Tax Rate Changes	3	254017	Regulatory Liability – PA Tax Rate Changes	N/A	$ (11,797,059.00)	3	3	3
Regulatory Liability – Insurance Settlement Proceeds	3	254020	Regulatory Liability – Insurance Settlement Proceeds	N/A	$ (936,313.95)	4	4	4
Regulatory Liability – Medicare Subsidy	3	254025	Regulatory Liability – Medicare Subsidy	N/A	$ (921,649.00)	Proposed amortization included in FPFTY per current filing.	$ -	$ (307,216.33)
Accumulated deferred income taxes - other property	1	282100	Accumulated Deferred Income Taxes – Depreciation	N/A	$ (74,940,198.84)	N/A	See Exhibit A Sch C-6 for ADIT forecast	See Exhibit A Sch C-6 for ADIT forecast
Accumulated deferred income taxes - other property; impact of Tax Cuts and Jobs Act change to Federal tax rate from 35% to 21%; account not included in rate base	12/31/2017	282109	Accumulated Deferred Income Taxes – Plant FAS 109	M-2018-2641242	$ 22,887,501.00	Amortized using Average Rate Assumption Method (ARAM)	See Exhibit A Sch D-11 for ARAM forecast	See Exhibit A Sch D-11 for ARAM forecast
Accumulated deferred income taxes - other property state	1	282150	Accumulated Deferred Income Taxes – Short-Term Depreciation	N/A	$ (3,984,928.00)	N/A	See Exhibit A Sch C-6 for ADIT forecast	See Exhibit A Sch C-6 for ADIT forecast
Accumulated deferred income taxes - other property state	1	282250	Accumulated NYS Deferred Tax – Plant	N/A	$ 2,798,844.00	N/A	See Exhibit A Sch C-6 for ADIT forecast	See Exhibit A Sch C-6 for ADIT forecast
Accumulated deferred income taxes - other	1	283000	Accumulated Deferred Income Taxes – Other	N/A	$ 2,565,159.47	N/A	3	3
Accumulated deferred income taxes - other	1	283100	Accumulated Deferred Income Taxes – Federal Other	N/A	$ (5,469,911.97)	N/A	3	3
Accumulated deferred income taxes - other; debit to accumulated deferred income taxes to record the tax effect of anticipated Medicare subsidy	3/31/2007	283106	Accumulated Deferred Income Taxes – Medicare Subsidy	M-2022-3035730	$ 208,206.00	Amortized over three-year period; final amortization is in FY2026	$ 208,206.00	$ -
Accumulated deferred income taxes - other	1	283109	Accumulated Deferred Income Taxes – Other FAS 109	N/A	$ (74,016,191.65)	N/A	3	3
Accumulated deferred income taxes - other OCI	1	283133	Accumulated Deferred Income Taxes – OCI	N/A	$ 3,921,990.00	N/A	3	3
Accumulated deferred income taxes - other state	1	283150	Accumulated Deferred Income Taxes – General	N/A	$ 106,042.00	N/A	3	3
Accumulated deferred income taxes - other state	1	283217	Accumulated Deferred Income Taxes – PA Tax Rate Changes	N/A	$ 11,797,059.00	N/A	3	3
Accumulated deferred income taxes - other state	1	283250	Accumulated NYS Deferred Tax – Other	N/A	$ 95,334.00	N/A	3	3

1 Account is permanent and does not have a discrete origin date; established as part of standard accounting structure.

2 Account established under Commission tariff or regulation; no specific docket order.

3 Excluded from rate base. Amounts remain deferred pending Commission approval. Any recovery/return and amortization methodology/period will be established by Commission order (or via the applicable rider reconciliation). No carrying costs unless explicitly authorized.

4 Amount represents environmental insurance proceeds that have been deferred as a regulatory liability since the rate payor paid for the premiums on the original policy. Environmental claims are processed against this account as they arise.

5 Amount represents a fringe benefit load adjustment that will reduce the cost of labor charged to capital projects and affiliates during fiscal 2026.

N/A Not Applicable - excluded from rate base.

Prepared by or under the supervision of:
Michael J. Maggioli

National Fuel Gas Distribution Corporation
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III-F.9

Request:

If the public utility is not publicly traded, supply the basis for injury and damages reserve and amortization shown on the HTY balance sheet. If the public utility is publicly traded, provide the independent audit report that includes an analysis of the reserve for injuries and damages.

Response:

National Fuel Gas Distribution Corporation is not a publicly traded company.

Balance for Pennsylvania Jurisdiction at September 30, 2025

ACCOUNT 228.2 – Accumulated Provision for Injuries and Damages $ (288,941)

This amount represents an accrual for incurred by not reported claims expense. The reserve is recorded as a debit to Other Regulatory Assets.

Prepared by or under the supervision of: Michael J. Maggioli

National Fuel Gas Distribution Corporation
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III-F.10

Request:

Provide a brief description and amount for any reserves outside the ordinary course of business appearing on the HTY balance sheet.

Response:

National Fuel Gas Distribution Corporation at September 30, 2025

ACCOUNT 229 - Accumulated Provision for Rate Refunds	$	(247,006)

This balance represents the sum of regulatory provisions related to rate refunds in New York.

Prepared by or under the supervision of: Michael J. Maggioli

National Fuel Gas Distribution Corporation
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III-F.11

Request:

Provide an analysis of unappropriated retained earnings for the HTY and the 2 years immediately preceding the HTY.

Response:

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
UNAPPROPRIATED RETAINED EARNINGS

	Fiscal Year Ended		
	2023	2024	2025
Balance, Beginning of Year	$ 447,643,541	$ 449,819,868	$ 458,809,262
Balance Transferred from Income	48,576,327	57,089,394	83,249,364
Dividends Declared - Common Stock	46,400,000	48,100,000	55,600,000
	$ 449,819,868	$ 458,809,262	$ 486,458,625

Prepared by or under the supervision of: Michael J. Maggioli

National Fuel Gas Distribution Corporation
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III-F.12

Request:

Describe the purpose of each advance made by the public utility to the parent company and describe the terms and conditions associated with such advance for the HTY and the 2 years immediately preceding the HTY. Provide an estimate of future advances or repayments by the public utility to the parent company that are expected to occur in the FTY or the FPFTY or both.

Response:

NFGDC does not make advances to National Fuel Gas Company.

Prepared by or under the supervision of: James C. Welch

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
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Responses to Section 53.53 - III-G-Income Statement and Cash Flow Statement
Delivered on January 28, 2026

III-G.1

Request:

Provide most current available income statement for the public utility, the parent company, and the consolidated group. If a claim is made for separate operating divisions of the public utility, an income statement must be shown for each operating division.

Response:

Please see the following pages for income statements for National Fuel Gas Company and NFGDC. The latest available income statement for NFGDC PA can be found in the response to ROR-013.

Prepared by or under the supervision of: James C. Welch

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
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(III-G.1 cont'd)

NATIONAL FUEL GAS COMPANY
Income Statement
($000) Omitted

	FY 2025
Operating Revenues	$ 2,263,901
OPERATING REVENUE DEDUCTIONS	
Purchased Gas Sold	213,441
Operating & Maintenance	544,226
Other Taxes	94,380
Impairment of Assets	141,802
Depreciation, Depletion, & Amortization	456,594
Total Operating Revenue Deductions	1,450,442
Operating Income	**813,459**
Other Income & Deductions	8,100
Non-Service Pension Costs	(28,327)
Interest Expense	155,834
Income before taxes	**694,053**
Income taxes	175,548
Net Income	**$ 518,504**

National Fuel Gas Distribution Corporation
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(III-G.1 cont'd)

NATIONAL FUEL GAS DISTRIBUTION COMPANY
INCOME STATEMENT
($000 OMITTED)

	FY 2025
OPERATING REVENUES	
Total Operating Revenues	**808,843**
Purchased Gas Sold	358,454
Revenue Tax	9,872
Total	**368,326**
Margin	**440,517**
Other Operating Revenues	8,786
OPERATING REVENUE DEDUCTIONS	
Total O&M Expenses	234,455
Depreciation, Depletion, & Amortization	69,701
Property, Franchise & Other Taxes	31,134
Total Operating Revenue Deductions	**335,290**
Operating Income	**114,013**
Other Income & Deductions	2,641
Non Service Pension Costs	(25,217)
Total Interest Expense	42,969
Income Before Taxes	**98,903**
Total Income Taxes	**15,653**
Net Income	**83,249**

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III-G.2

Request:

Provide copies of the summaries of the public utility's projected revenues, expenses, and capital budgets for the FTY and the FPFTY.

Response:

See the Company's response to III-E.16

Prepared by or under the supervision of: Anthony Formato

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
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Responses to Section 53.53 - III-G-Income Statement and Cash Flow Statement
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III-G.3

Request:

Provide a summary income statement showing all of the following:

III.G.3.a Per book income statement for the HTY.
III.G.3.b FTY adjustments to annualize and normalize revenue and expenses under present rates.
III.G.3.c Pro forma FTY income statement at present rates.
III.G.3.d FPFTY adjustments to revenues and expenses at present rates.
III.G.3.e Pro forma FPFTY income statement at present rates.
III.G.3.f Requested increase and corresponding iterative changes (e.g., uncollectible accounts, assessments and income taxes) with increase.
III.G.3.g Pro forma FPFTY income statement at proposed rates.
III.G.3.h References to schedules that contain supporting details for corresponding adjustments.

Response:

a – g. Please refer to National Fuel Exhibit A (HTY), National Fuel Exhibit A (FTY), and National Fuel Exhibit A (FPFTY), schedules in Section D, for the Company's presentation of the requested Statements of Income and adjustments to operating revenues and expenses at present and proposed rates.

h. Please refer to the Direct Testimony of Donald N. Koch, National Fuel Statement No. 2, Direct Testimony of Anthony Formato, National Fuel Statement No. 3 and the Direct Testimony of Courtney Mann, National Fuel Statement No. 14, for explanations of the Statements of Income and adjustments to operating revenues and expenses depicted in the Section D schedules of National Fuel Exhibit A (HTY), (FTY) and (FPFTY), the underlying sources of budgeted information, and the basis for the adjustments.

Please refer to the Direct Testimony of Joshua Nowak, National Fuel Statement No. 10, Direct Testimony of James Welch, National Fuel Statement No. 11 and related National Fuel Exhibit B, Schedule 6, for the derivation of the weighted average cost of debt used in the Company's debt interest synchronization adjustment, including the treatment of debt issuance expense, premiums and discounts used in calculating the effective cost rate for each series of long-term debt.

Please refer to the Direct Testimony of Courtney Mann, National Fuel Statement No. 14,

for an explanation on the derivation of future test year and fully projected year sales and revenues.

Please refer to the Direct Testimony of Erica Forcucci, National Fuel Statement No. 12, for an explanation of the Company's income tax adjustments.

Prepared by or under the supervision of: Donald N. Koch

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
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Responses to Section 53.53 - III-G-Income Statement and Cash Flow Statement
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III-G.4

Request:

Provide comparative income statements showing increases and decreases between the following two periods of time: (1) Two years prior to the HTY and one year prior to the HTY. (2) One year prior to the HTY and the HTY. Provide explanations for each comparison for variances that are greater than 15% of the summary level account type.

Response:

National Fuel Gas Distribution Corporation (Pennsylvania Division)
Comparative Statements of Income
(In Thousands)

	Twelve Months Ended 9/30/2023	Twelve Months Ended 9/30/2024	Variance $	Variance %
Revenue				
Gas Service Revenue	$ 273,903	$ 204,763	$ (69,140)	-33.8%
Other Operating Revenue	829	1,559	730	46.9%
Total Operating Revenues	274,732	206,322	(68,411)	-33.2%
Expenses				
Operating and Maintenance Expense	229,626	141,184	(88,441)	-62.6%
Depreciation and Amortization Expense	16,200	17,846	1,645	9.2%
Other Taxes	2,041	2,326	285	12.3%
Interest (Income) / Expense	7,726	10,010	2,284	22.8%
Miscellaneous (Income) / Expense	443	(410)	(853)	207.9%
Total Expenses Before Income Taxes	256,036	170,956	(85,079)	-49.8%
Income Before Taxes	18,696	35,365	16,669	47.1%
Tax Expense/(Benefit)	1,344	(316)	(1,660)	525.4%
Net Income	$ 17,352	$ 35,681	$ 18,329	51.4%

Explanations of major variances, defined as 15% or greater of the summary level account type, are shown below (in thousands):

Gas Service Revenue – Decrease of $69,140 primarily due to a decrease in gas costs (Account 481).

Other Operating Revenue – Increase of $730 primarily due to an increase in the estimated refund of tax benefit resulting from the 2017 Tax Reform (Account 495).

Operating and Maintenance Expense – Decrease of $88,441 primarily due to a decrease in gas costs (Account 401.999).

Interest (Income)/Expense - Increase of $2,284 relates to higher interest on long term debt as a result of higher outstanding debt balances (Account 430.0), higher interest rates for money pool funds (Account 430.004), and a larger amount of overcollection of gas costs (Account 431.401).

Miscellaneous Income / Expense – Decrease of $853 primarily due to a decrease in realized losses on Grantor Trust investments partially offset by unrealized gains on such investments (Account 421).

Tax Expense – Decrease of $1,660 primarily due to permanent differences associated with repairs and maintenance deduction calculation methodology offset by an increase in federal tax credits not yet utilized.

Response:

National Fuel Gas Distribution Corporation (Pennsylvania Division)
Comparative Statements of Income
(In Thousands)

	Twelve Months Ended 9/30/2024	Twelve Months Ended 9/30/2025	Variance $	Variance %
Revenue				
Gas Service Revenue	$ 204,763	$ 238,277	$ 33,514	14.1%
Other Operating Revenue	1,559	1,463	(96)	-6.6%
Total Operating Revenues	206,322	239,740	33,417	13.9%
Expenses				
Operating and Maintenance Expense	141,184	173,226	32,042	18.5%
Depreciation and Amortization Expense	17,846	19,244	1,398	7.3%
Other Taxes	2,326	2,151	(175)	-8.1%
Interest (Income) / Expense	10,010	12,184	2,174	17.8%
Miscellaneous (Income) / Expense	(410)	(123)	287	-232.2%
Total Expenses Before Income Taxes	170,956	206,682	35,725	17.3%
Income Before Taxes	35,365	33,058	(2,307)	-7.0%
Tax (Benefit)/Expense	(316)	2,820	3,136	111.2%
Net Income	$ 35,681	$ 30,239	$ (5,442)	-18.0%

Explanations of major variances, defined as 15% or greater of the summary level account type, are shown below (in thousands):

Operating and Maintenance Expense – Increase of $32,042 primarily due to an increase in gas costs (Account 401.999)

Interest (Income)/Expense - Increase of $2,174 relates to higher interest on long term debt as a result of higher outstanding debt balances (Account 430.0), offset by lower interest rates for money pool funds (Account 430.004), offset by smaller amount of overcollection of gas costs (Account 431.401) and offset by decrease in interest income earned for Grantor Trust (Account 419.001).

Miscellaneous Income / Expense – Decrease of $287 due to a decrease in unrealized losses on Grantor Trust investments, an increase in realized losses on such investments along with an offset increase of gain on disposal of property (Account 421).

Tax Expense – Increase of $3,136 due to permanent differences associated with repairs and maintenance deduction calculation methodology, changes in credit carryforward utilization between periods, amortization of Medicare subsidy amounts pursuant to the PA PUC 2022 rate case settlement, and higher state income tax resulting from a reduced repairs and maintenance deduction.

Prepared by or under the supervision of:
Michael J. Maggioli

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-G-Income Statement and Cash Flow Statement
Delivered on January 28, 2026

III-G.5

Request:

Provide operating income claims and rate of return on rate base for the HTY, the FTY and the FPFTY under all of the following:

III.G.5.a Present rates.
III.G.5.b Pro forma present rates.
III.G.5.c Pro forma proposed rates.

Response:

Please refer to National Fuel Exhibit A (HTY), National Fuel Exhibit A (FTY), and National Fuel Exhibit A (FPFTY), Schedules A-1, D-1, and D-2.

Prepared by or under the supervision of: Donald N. Koch

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-G-Income Statement and Cash Flow Statement
Delivered on January 28, 2026

III-G.6

Request:

If a cash flow analysis is provided with the filing, provide a cash flow statement under present rates showing all of the following:

III.G.6.a All cash inflows from customer rates.
III.G.6.b Depreciation.
III.G.6.c Deferred taxes.
III.G.6.d External financing.
III.G.6.e Investment income.
III.G.6.f All other sources of cash.
III.G.6.g All cash outflows used to pay for public utility operations, administrative and general expenses, taxes, capital investments and dividends.
III.G.6.h All other cash outflows identifying the uses of funds.

Response:

A cash flow analysis has not been provided as part of this filing.

Prepared by or under the supervision of: James C. Welch

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-G-Income Statement and Cash Flow Statement
Delivered on January 28, 2026

III-G.7

Request:

If a cash flow analysis is provided with the filing, provide a cash flow statement under the FPFTY proposed rates showing all of the following:

III.G.7.a All cash inflows from customer rates.
III.G.7.b Depreciation.
III.G.7.c Deferred taxes.
III.G.7.d External financing.
III.G.7.e Investment income.
III.G.7.f All other sources of cash.
III.G.7.g All cash outflows used to pay for public utility operations, administrative and general expenses, taxes, capital investments and dividends.
III.G.7.h All other cash outflows identifying the uses of funds.

Response:

A cash flow analysis has not been provided as part of this filing.

Prepared by or under the supervision of: James C. Welch

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-H-Operating Revenues
Delivered on January 28, 2026

III-H.1

Request:

Provide for the HTY, the 2 years immediately preceding the HTY, the FTY and the FPFTY all of the following by customer class:

III.H.1.a Customer count.
III.H.1.b Sales by unit.
III.H.1.c Revenues.
III.H.1.d Change in revenue expressed as a percentage and a dollar amount.
III.H.1.e Forfeited discounts.
III.H.1.f Detailed breakdown of miscellaneous revenues.
III.H.1.g Annualizing and normalizing adjustments, showing all calculations.
III.H.1.h Surcharge revenues from recorded revenues itemized by appropriate revenue category.

Response:

i. Please see Exhibit CTM-1 through CTM-7 for FPFTY, FTY, and HTY for request (a) through (h). Please see attachment III-H.1 for requests regarding 2 years immediately preceding the HTY and for late payment charges. Please refer to III-H.5 for a detailed breakdown of miscellaneous revenues.

Prepared by or under the supervision of: Courtney T. Mann

National Fuel Gas Distribution Corporation
Pennsylvania Division
Late Payment Charges
III-H.1

Rate Category	10/2022	11/2022	12/2022	01/2023	02/2023	03/2023	04/2023	05/2023	06/2023	07/2023	08/2023	09/2023	Total
C_NGVS	0	-	-	1	248	-	-	-	-	-	-	-	249
DMLMT	540	-	-	-	-	-	-	-	-	-	-	-	540
IVIS	(1,252)	306	848	108	1,382	1,479	1,273	2,382	(289)	487	243	583	7,548
IVIS-LBS	45	25	111	-	-	-	-	-	-	-	-	-	181
IVIS_DMT	109	114	298	499	392	111	-	-	236	119	28	-	1,905
LCPA	482	1,200	2,179	3,581	4,411	3,289	2,637	2,125	1,217	1,172	558	599	23,450
LCPA-BYP	-	-	-	-	-	-	-	24	-	-	-	-	24
LCPA_DMT	204	366	186	834	414	370	177	43	540	249	206	48	3,635
LIS	-	-	-	-	-	-	-	-	-	-	-	-	-
LIS_DMT	208	320	378	2,434	1,785	2,400	1,275	-	412	278	-	-	9,489
LVIS	-	152	-	91	-	12	226	27	-	-	-	-	508
LVIS-LBS	-	-	-	-	-	-	-	-	-	-	-	-	-
LVIS_DMT	114	297	330	860	915	373	390	0	120	211	86	-	3,697
RSS	81,519	98,862	130,633	159,916	166,229	137,132	122,593	97,121	80,214	54,354	68,158	71,844	1,268,577
SCPA-LL	1,043	1,483	2,703	4,944	5,710	5,171	4,707	3,129	883	298	621	860	31,553
SCPA-UL	1,393	1,427	2,857	5,664	5,821	5,528	5,242	3,386	1,415	885	743	1,203	35,564
SVIS	15	36	116	392	371	603	453	480	76	(1)	499	17	3,055
SVIS-BYP	5	-											5
Total	**84,425**	**104,588**	**140,639**	**179,322**	**187,678**	**156,468**	**138,971**	**108,717**	**84,825**	**58,052**	**71,142**	**75,154**	**1,389,981**

Rate Category	10/2023	11/2023	12/2023	01/2024	02/2024	03/2024	04/2024	05/2024	06/2024	07/2024	08/2024	09/2024	Total
C_NGVS	-	-	83	236	244	244	244	-	-	-	-	-	1,050
DMLMT	-	-	-	-	-	-	-	-	-	-	-	-	-
IVIS	257	335	737	806	1,272	774	502	671	799	230	140	116	6,639
IVIS-LBS	-	-	-	-	-	(7)	-	-	-	-	-	-	(7)
IVIS_DMT	118	106	294	509	346	364	320	447	134	108	70	133	2,950
LCPA	783	808	1,711	1,919	2,389	2,779	1,106	1,255	1,328	916	559	403	15,956
LCPA-BYP	13	-	-	-	10	-	-	-	-	-	-	-	22
LCPA_DMT	-	-	604	670	801	469	659	746	646	34	32	424	5,085
LIS	-	-	-	-	-	-	-	-	-	-	-	-	-
LIS_DMT	-	297	434	1,695	1,013	1,069	2,251	2,203	883	679	305	445	11,273
LVIS	25	110	-	134	-	-	-	-	108	-	-	121	497
LVIS-LBS	-	-	-	-	-	-	-	-	-	-	-	-	-
LVIS_DMT	-	70	2,197	888	284	203	1,271	812	587	192	548	322	7,374
RSS	66,606	77,915	100,103	120,541	124,886	101,434	85,666	75,594	69,144	54,570	61,838	60,119	998,415
SCPA-LL	752	1,518	1,689	2,890	3,355	3,978	3,527	2,631	1,002	598	786	1,140	23,867
SCPA-UL	787	1,009	2,040	3,109	3,668	3,804	2,840	2,428	973	448	730	506	22,343
SVIS	13	(30)	51	134	150	270	167	91	95	(4)	24	29	990
SVIS-BYP	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	**69,354**	**82,138**	**109,943**	**133,530**	**138,418**	**115,381**	**98,554**	**86,879**	**75,699**	**57,771**	**65,032**	**63,758**	**1,096,457**

Rate Category	10/2024	11/2024	12/2024	01/2025	02/2025	03/2025	04/2025	05/2025	06/2025	07/2025	08/2025	09/2025	Total
C_NGVS	-	-	-	-	-	0	-	-	382	6	6	6	400
DMLMT	-	-	-	-	-	-	-	-	-	-	-	-	-
IVIS	108	479	608	911	1,196	1,341	1,541	825	1,045	460	571	766	9,851
IVIS-LBS	-	-	-	-	4	-	-	-	-	-	-	74	77
IVIS_DMT	64	193	575	477	519	951	563	329	349	53	91	313	4,476
LCPA	452	824	1,278	2,231	3,907	3,666	2,169	1,282	1,519	941	701	306	19,276
LCPA-BYP	-	-	-	-	-	-	-	-	-	-	-	49	49
LCPA_DMT	135	-	470	825	699	944	242	273	704	703	340	261	5,596
LIS	-	-	-	-	453	-	-	-	-	-	-	-	453
LIS_DMT	227	854	907	1,012	-	1,534	304	1,382	719	1,729	978	1,604	11,250
LVIS	129	99	225	148	154	-	-	335	-	114	-	-	1,202
LVIS-LBS	-	-	187	(93)	-	-	-	-	-	-	-	-	93
LVIS_DMT	222	300	1,045	1,325	786	1,338	347	893	1,071	263	67	524	8,181
RSS	58,753	68,842	97,714	118,003	130,135	127,083	96,630	87,167	68,349	54,263	63,169	65,693	1,035,802
SCPA-LL	731	1,248	2,231	3,639	4,033	4,983	4,473	2,431	707	765	1,184	978	27,403
SCPA-UL	711	794	1,799	3,392	4,038	4,098	4,104	2,555	1,237	935	1,198	621	25,484
SVIS	29	28	75	234	351	378	376	144	62	33	51	(2)	1,758
SVIS-BYP	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	**61,560**	**73,661**	**107,114**	**132,105**	**146,272**	**146,314**	**110,749**	**97,616**	**76,146**	**60,266**	**68,356**	**71,194**	**1,151,353**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
Residential Sales Service													
Customers	171,050	171,766	172,664	173,396	173,602	173,716	173,307	172,761	171,908	171,285	170,785	170,255	2,066,493
First 5 Mcf	582,058	697,685	831,412	858,279	825,964	817,904	806,331	730,061	424,470	194,058	237,017	294,047	7,299,286
Over 5 Mcf	157,640	433,643	1,485,885	1,888,348	1,723,910	1,506,203	937,919	387,266	17,877	13,415	1,223	(10,323)	8,543,006
Total Volume	739,698	1,131,329	2,317,297	2,746,626	2,549,874	2,324,107	1,744,251	1,117,327	442,347	207,473	238,240	283,724	15,842,292
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$2,045,753	$2,048,786	$2,112,992	$2,157,003	$2,075,271	$2,066,776	$2,085,990	$2,090,878	$2,099,521	$2,013,614	$2,168,141	$2,393,915	$25,358,640
First 5 Mcf	$1,696,326	$2,033,480	$2,422,840	$2,501,422	$2,407,359	$2,383,350	$2,349,736	$2,127,876	$1,237,039	$565,548	$696,469	$871,188	$21,292,633
Over 5 Mcf	$316,201	$856,745	$2,971,065	$3,776,108	$3,446,765	$3,011,662	$1,875,580	$769,332	$36,067	$26,768	($8,384)	($20,375)	$17,057,534
Revenue Rounding	$187	$1,041	($3,026)	($2,902)	($79)	($2,004)	($1,735)	$1,345	($271)	($150)	$548	($254)	($7,299)
Rider B - State Tax Adjustment	($27,045)	($38,407)	($72,938)	($85,234)	($77,817)	($70,055)	($54,582)	($37,410)	($18,765)	($11,735)	($5,666)	$547	($499,108)
Rider E - Customer Education	$0	$1	$6	$4	($0)	($0)	($0)	($0)	($0)	$0	($0)	($0)	$11
Rider F - LIRA Discount Charge	$112,886	$164,627	$322,961	$382,576	$293,331	$208,234	$157,053	$127,845	$65,357	$29,639	$28,121	$30,282	$1,922,911
Rider G - Merchant Function Charge	$144,579	$216,528	$438,512	$519,582	$448,684	$376,611	$282,871	$173,925	$65,198	$30,723	$20,506	$13,157	$2,730,876
Rider H - Gas Procurement Charge	$77,753	$118,233	$243,339	$288,433	$267,790	$244,055	$183,160	$117,195	$46,486	$21,777	$25,606	$32,780	$1,666,608
Total Base Non Gas Cost Rate Revenue	$4,366,641	$5,401,034	$8,435,751	$9,536,992	$8,861,304	$8,218,628	$6,878,073	$5,370,986	$3,530,631	$2,676,183	$2,925,341	$3,321,241	$69,522,807
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$5,874,980	$8,716,927	$17,447,458	$20,675,701	$17,685,284	$14,673,840	$11,024,769	$6,736,659	$2,503,119	$1,182,276	$1,090,227	$1,134,988	$108,746,227
Rider A - Distribution Charge	$210,114	$320,322	$661,294	$783,667	$729,417	$668,005	$501,417	$331,868	$138,095	$64,276	$66,719	$77,146	$4,552,340
Rider A - Gas Adjustment Charge	$624,462	$1,018,284	$2,267,118	$2,683,626	$2,491,211	$2,271,520	$1,702,711	$1,088,943	$432,139	$202,363	($85,834)	($372,099)	$14,324,446
Rider F - Reconcilation	($5,428)	($8,372)	($17,038)	($20,011)	($52,910)	($83,004)	($61,928)	($39,561)	($15,383)	($7,009)	($7,941)	($9,759)	($328,343)
Rider I - OPEB Surcredit	($154,141)	($237,055)	($487,561)	($577,791)	($536,716)	($488,990)	($366,714)	($234,692)	($93,134)	($43,604)	($48,833)	($59,915)	($3,329,146)
Tax Cuts & Jobs Act Refund	($125,244)	($158,004)	($325,758)	($386,447)	($359,454)	($326,894)	($245,326)	($157,199)	($62,299)	($29,247)	($32,631)	($40,004)	($2,248,507)
Total Gas Cost Revenues	$6,424,743	$9,652,102	$19,545,514	$23,158,746	$19,956,832	$16,714,477	$12,554,929	$7,726,019	$2,902,537	$1,369,055	$981,706	$730,358	$121,717,016
Total Revenues	$10,791,384	$15,053,136	$27,981,265	$32,695,738	$28,818,136	$24,933,106	$19,433,002	$13,097,005	$6,433,169	$4,045,238	$3,907,047	$4,051,599	$191,239,823

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

Residential CAP/LIRA	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
Customers	6,870	6,819	6,742	6,780	6,815	7,035	7,329	7,510	7,523	7,570	7,729	7,953	86,675
First 5 Mcf	24,756	29,207	33,141	34,510	33,302	34,116	35,364	33,274	22,028	9,569	10,579	13,116	312,961
Over 5 Mcf	6,957	18,610	62,804	79,213	72,825	65,568	45,942	20,125	1,358	(763)	(438)	(907)	371,292
Total Volume	31,713	47,817	95,945	113,723	106,126	99,683	81,306	53,399	23,385	8,806	10,142	12,209	684,253
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$82,216	$81,400	$82,195	$84,666	$81,801	$84,214	$88,617	$90,349	$91,843	$89,605	$97,949	$111,805	$1,066,657
First 5 Mcf	$72,137	$85,140	$96,579	$100,568	$97,062	$99,413	$103,056	$96,979	$64,197	$27,882	$31,029	$38,877	$912,919
Over 5 Mcf	$13,924	$36,860	$125,590	$158,374	$145,585	$131,108	$91,911	$40,037	$2,715	($1,539)	($1,667)	($1,681)	$741,215
Revenue Rounding	($23)	$21	($135)	($121)	$8	($144)	($139)	$61	$0	$15	$44	$13	($398)
Rider B - State Tax Adjustment	($791)	($1,115)	($2,027)	($2,378)	($2,250)	($2,071)	($1,733)	($1,226)	($645)	($357)	($204)	$31	($14,765)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$6,186	$9,138	$18,149	$21,522	$18,741	$16,146	$13,162	$8,320	$3,464	$1,306	$863	$510	$117,509
Rider H - Gas Procurement Charge	$3,333	$5,000	$10,075	$11,943	$11,143	$10,468	$8,538	$5,599	$2,457	$924	$1,069	$1,423	$71,973
LIRA Discounts	($136,852)	($187,218)	($362,581)	($422,688)	($352,956)	($321,957)	($274,202)	($182,284)	($97,306)	($52,976)	($37,666)	($41,443)	($2,470,129)
Total Base Non Gas Cost Rate Revenue	$40,130	$29,227	($32,155)	($48,114)	($866)	$17,177	$29,210	$57,834	$66,725	$64,860	$91,416	$109,535	$424,980
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$251,517	$368,480	$722,111	$856,364	$739,112	$629,295	$513,210	$322,327	$133,152	$50,124	$45,697	$47,845	$4,679,236
Rider A - Distribution Charge	$9,003	$13,538	$27,380	$32,444	$30,350	$28,646	$23,371	$15,837	$7,273	$2,742	$2,788	$3,328	$196,701
Rider A - Gas Adjustment Charge	$26,554	$42,390	$93,827	$111,194	$103,627	$97,198	$79,004	$52,047	$22,784	$8,761	($3,487)	($17,166)	$616,733
Rider I - OPEB Surcredit	($6,617)	($9,992)	($20,165)	($23,941)	($22,341)	($20,955)	($17,063)	($11,230)	($4,917)	($1,868)	($2,039)	($2,594)	($143,723)
Tax Cuts & Jobs Act Refund	($5,391)	($6,705)	($13,480)	($16,001)	($14,968)	($14,031)	($11,453)	($7,522)	($3,294)	($1,231)	($1,366)	($1,721)	($97,163)
Total Gas Cost Revenues	$275,066	$407,711	$809,673	$960,061	$835,779	$720,154	$587,069	$371,458	$154,998	$58,529	$41,593	$29,692	$5,251,784
Total Revenues	$315,196	$436,939	$777,518	$911,947	$834,913	$737,331	$616,280	$429,293	$221,723	$123,388	$133,009	$139,228	$5,676,764

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
Residential SATC													
Customers	17,352	17,235	17,156	17,122	17,032	16,923	16,723	16,581	16,569	16,599	16,507	16,426	202,223
First 5 Mcf	61,154	71,537	84,063	85,703	82,416	81,041	79,548	72,045	43,167	19,729	23,846	28,692	732,939
Over 5 Mcf	17,462	43,447	154,070	191,773	173,228	150,167	93,397	38,877	2,467	1,097	187	(1,035)	865,137
Total Volume	78,616	114,984	238,133	277,475	255,644	231,208	172,945	110,922	45,634	20,826	24,032	27,657	1,598,076
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$207,199	$205,179	$209,235	$211,930	$203,388	$201,359	$200,897	$199,554	$202,238	$195,332	$210,084	$230,318	$2,476,713
First 5 Mcf	$178,220	$208,489	$244,977	$249,754	$240,198	$236,125	$231,786	$210,082	$125,801	$57,496	$69,966	$84,939	$2,137,834
Over 5 Mcf	$34,784	$85,763	$308,015	$383,500	$346,469	$300,252	$186,752	$77,169	$4,764	$2,174	($623)	($1,949)	$1,727,067
Revenue Rounding	$8	$34	($301)	($286)	($22)	($191)	($157)	($43)	($49)	($13)	$26	$11	($982)
Rider B - State Tax Adjustment	($1,065)	($1,298)	($2,036)	($2,261)	($2,168)	($2,075)	($1,740)	($1,403)	($978)	($747)	($394)	$16	($16,148)
Rider E - Customer Education	$0	$0	$1	$0	($0)	($0)	($0)	$0	($0)	$0	$0	$0	$1
Rider F - LIRA Discount Charge	$11,964	$16,731	$33,186	$38,635	$29,362	$20,731	$15,563	$12,696	$6,666	$2,984	$2,851	$2,945	$194,314
Total Base Non Gas Cost Rate Revenue	$431,111	$514,898	$793,076	$881,272	$817,228	$756,202	$633,100	$498,055	$338,442	$257,226	$281,910	$316,280	$6,518,788
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$1,755	$2,451	$5,420	$6,299	$5,583	$5,271	$3,944	$2,363	$999	$442	$382	$393	$35,301
Rider A - Distribution Charge	$22,293	$32,548	$67,950	$79,164	$73,131	$66,454	$49,715	$32,929	$14,193	$6,454	$6,751	$7,522	$459,103
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider F - Reconcilation	($574)	($782)	($1,742)	($2,019)	($5,303)	($8,253)	($6,144)	($3,815)	($1,592)	($704)	($789)	($945)	($32,664)
Rider I - OPEB Surcredit	($16,347)	($24,112)	($50,108)	($58,345)	($53,724)	($48,668)	($36,363)	($23,293)	($9,592)	($4,383)	($4,930)	($5,828)	($335,694)
Tax Cuts & Jobs Act Refund	($13,302)	($16,082)	($33,496)	($39,051)	($36,071)	($32,507)	($24,318)	($15,610)	($6,402)	($2,932)	($3,298)	($3,900)	($226,970)
Total Gas Cost Revenues	($6,175)	($5,978)	($11,978)	($13,952)	($16,384)	($17,704)	($13,166)	($7,426)	($2,396)	($1,123)	($1,884)	($2,759)	($100,924)
Total Revenues	$424,935	$508,920	$781,099	$867,320	$800,844	$738,498	$619,934	$490,629	$336,046	$256,103	$280,026	$313,521	$6,417,864

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
Residential MMT													
Customers	332	313	313	330	346	346	353	352	353	452	455	455	4,400
All Mcf	3,643	7,256	14,195	18,391	17,608	15,570	13,091	7,296	2,937	867	825	1,186	102,865
Total Volume	3,643	7,256	14,195	18,391	17,608	15,570	13,091	7,296	2,937	867	825	1,186	102,865
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$3,657	$3,704	$3,788	$4,170	$4,118	$4,085	$4,249	$4,247	$4,293	$5,381	$5,656	$6,452	$53,801
All Volume	$9,767	$19,380	$38,018	$49,441	$47,159	$41,874	$35,182	$19,616	$7,883	$2,353	$2,263	$3,510	$276,447
Revenue Rounding	$643	$1,075	$2,175	$2,946	$2,698	$2,503	$2,089	$1,170	$465	$152	($30)	($46)	$15,841
Rider B - State Tax Adjustment	($38)	($68)	($126)	($163)	($158)	($147)	($125)	($77)	($39)	($24)	($11)	$1	($975)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider F - LIRA Discount Charge	$556	$1,072	$1,975	$2,566	$2,143	$1,407	$1,180	$787	$429	$126	$100	$124	$12,464
Total Base Non Gas Cost Rate Revenue	$14,585	$25,164	$45,829	$58,960	$55,960	$49,722	$42,575	$25,743	$13,031	$7,988	$7,978	$10,041	$357,578
Gas Cost Revenues:													
MMT Gas Cost Charge	$1,058	$2,131	$4,136	$5,296	$5,129	$4,483	$3,776	$2,102	$850	$243	$316	$461	$29,983
Rider F - Reconcilation	($26)	($51)	($100)	($130)	($300)	($547)	($461)	($258)	($99)	($30)	($30)	($41)	($2,072)
Rider I - OPEB Surcredit	($485)	($922)	($1,803)	($2,333)	($2,237)	($1,978)	($1,663)	($927)	($374)	($110)	($105)	($151)	($13,087)
Tax Cuts & Jobs Act Refund	($475)	($770)	($1,506)	($1,938)	($1,868)	($1,651)	($1,389)	($774)	($315)	($92)	($87)	($126)	($10,992)
Priority Standby	$499	$1,113	$1,861	$2,804	$2,236	$2,275	$1,775	$1,102	$383	$312	$242	$275	$14,874
Total Gas Cost Revenues	$571	$1,500	$2,587	$3,698	$2,961	$2,582	$2,038	$1,245	$445	$323	$336	$418	$18,706
Total Revenues	$15,156	$26,664	$48,416	$62,658	$58,921	$52,305	$44,614	$26,988	$13,476	$8,312	$8,314	$10,459	$376,284

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

SCPA < 250 Sales	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
Customers	8,337	8,386	8,477	8,541	8,523	8,473	8,440	8,376	8,255	8,188	8,160	8,130	100,283
First 5 Mcf	20,834	27,319	35,955	39,035	37,525	36,480	34,924	31,131	13,676	2,205	6,158	10,435	295,677
Over 5 Mcf	11,691	29,548	95,705	133,782	130,106	104,637	64,238	25,660	(3,999)	2,439	1,714	(85)	595,434
Total Volume	32,524	56,867	131,660	172,818	167,631	141,116	99,162	56,791	9,677	4,644	7,872	10,350	891,111
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$164,468	$164,512	$169,912	$176,161	$168,571	$168,632	$168,385	$172,397	$164,204	$165,679	$176,546	$229,912	$2,089,380
First 5 Mcf	$50,295	$65,941	$86,800	$94,293	$90,589	$88,064	$84,307	$75,133	$33,040	$5,321	$14,241	$23,936	$711,960
Over 5 Mcf	$24,818	$62,695	$203,091	$284,452	$276,162	$222,111	$136,339	$54,410	($8,477)	$5,179	$3,047	($156)	$1,263,670
Revenue Rounding	($16)	($4)	($60)	($82)	($64)	($75)	($59)	($11)	$28	$27	$32	$1	($285)
Rider B - State Tax Adjustment	($1,322)	($2,019)	($4,158)	($5,334)	($5,081)	($4,284)	($3,159)	($2,028)	($737)	($609)	($298)	$19	($29,009)
Rider E - Customer Education	$0	$0	$2	$1	$0	$0	$0	$0	$0	$0	$0	$0	$3
Rider G - Merchant Function Charge	$649	$1,113	$2,555	$3,357	$3,024	$2,338	$1,643	$910	$129	$63	$86	$107	$15,975
Rider H - Gas Procurement Charge	$3,414	$5,967	$13,817	$18,165	$17,596	$14,813	$10,410	$5,995	$1,016	$482	$839	$1,193	$93,708
Total Base Non Gas Cost Rate Revenue	$242,306	$298,206	$471,959	$571,013	$550,798	$491,598	$397,866	$306,806	$189,203	$176,142	$194,492	$255,013	$4,145,402
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$258,134	$440,253	$991,267	$1,302,769	$1,164,991	$890,772	$626,796	$345,374	$50,156	$26,811	$35,181	$42,064	$6,174,569
Rider A - Distribution Charge	$9,233	$16,182	$37,567	$49,375	$47,949	$40,550	$28,498	$16,923	$3,185	$1,426	$2,132	$2,809	$255,828
Rider A - Gas Adjustment Charge	$27,513	$51,916	$129,211	$169,364	$163,576	$137,940	$96,950	$56,135	$9,241	$4,498	($4,266)	($13,298)	$828,780
Rider I - OPEB Surcredit	($3,373)	($6,046)	($13,980)	($18,373)	($17,777)	($14,954)	($10,519)	($6,052)	($1,017)	($487)	($793)	($1,094)	($94,465)
Tax Cuts & Jobs Act Refund	($5,885)	($8,779)	($20,567)	($27,069)	($26,236)	($22,061)	($15,505)	($8,856)	($1,527)	($736)	($1,203)	($1,622)	($140,046)
DMT Standby Overrun Charge	($59)	($0)	$121	$0	$31	($31)	$0	$0	$2	$1	($3)	$0	$62
Total Gas Cost Revenues	$285,563	$493,526	$1,123,619	$1,476,065	$1,332,535	$1,032,215	$726,219	$403,524	$60,039	$31,513	$31,049	$28,860	$7,024,728
Total Revenues	$527,868	$791,732	$1,595,578	$2,047,078	$1,883,333	$1,523,813	$1,124,085	$710,330	$249,243	$207,656	$225,541	$283,873	$11,170,130

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

SCPA < 250 SATC	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
Customers	937	930	919	913	907	874	850	846	853	856	851	850	10,584
First 5 Mcf	2,725	3,288	4,181	4,334	4,161	3,999	3,709	3,465	1,604	360	662	1,221	33,709
Over 5 Mcf	1,516	3,279	11,419	15,252	14,233	11,615	6,793	3,010	(354)	153	74	(23)	66,968
Total Volume	4,241	6,568	15,600	19,586	18,394	15,614	10,502	6,475	1,251	513	736	1,199	100,677
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$18,598	$18,268	$18,508	$18,748	$17,940	$17,195	$16,960	$17,547	$17,095	$17,097	$18,505	$23,629	$220,088
First 5 Mcf	$6,578	$7,939	$10,092	$10,464	$10,040	$9,654	$8,943	$8,365	$3,860	$870	$1,524	$2,804	$81,134
Over 5 Mcf	$3,215	$6,960	$24,237	$32,371	$30,199	$24,658	$14,389	$6,391	($759)	$324	$112	($49)	$142,047
Revenue Rounding	($2)	($0)	($7)	($9)	($7)	($8)	($7)	($3)	$2	$2	$2	$0	($37)
Rider B - State Tax Adjustment	($71)	($85)	($139)	($162)	($159)	($147)	($114)	($93)	($59)	($53)	($26)	$1	($1,108)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$28,317	$33,081	$52,692	$61,411	$58,013	$51,352	$40,172	$32,206	$20,139	$18,238	$20,116	$26,386	$442,124
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$97	$147	$352	$441	$416	$351	$241	$146	$28	$11	$11	$17	$2,260
Rider A - Distribution Charge	$1,204	$1,868	$4,450	$5,587	$5,264	$4,485	$3,019	$1,923	$408	$160	$201	$326	$28,896
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($442)	($697)	($1,655)	($2,078)	($1,954)	($1,655)	($1,126)	($687)	($139)	($53)	($75)	($127)	($10,688)
Tax Cuts & Jobs Act Refund	($767)	($1,015)	($2,439)	($3,060)	($2,870)	($2,445)	($1,633)	($1,016)	($190)	($78)	($111)	($188)	($15,813)
Total Gas Cost Revenues	$91	$302	$708	$891	$856	$736	$501	$367	$107	$40	$27	$29	$4,655
Total Revenues	$28,408	$33,383	$53,400	$62,302	$58,869	$52,089	$40,673	$32,572	$20,246	$18,279	$20,143	$26,414	$446,779

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
SCPA < 250 MMT													
Customers	999	1,008	1,007	1,027	1,062	1,050	1,075	1,079	1,081	1,086	1,095	1,097	12,664
All Mcf	4,738	8,153	19,694	26,705	27,981	22,540	15,258	9,014	1,851	997	1,619	2,591	141,142
Total Volume	4,738	8,153	19,694	26,705	27,981	22,540	15,258	9,014	1,851	997	1,619	2,591	141,142
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$19,615	$19,682	$20,252	$21,222	$20,949	$20,731	$21,414	$22,602	$21,045	$21,863	$23,745	$30,920	$264,039
All Mcf	$11,203	$19,287	$46,589	$63,173	$66,215	$53,338	$36,090	$21,324	$4,379	$2,359	$3,760	$6,009	$333,727
Revenue Rounding	($0)	$0	($0)	$0	$0	($0)	$0	($0)	($0)	($1)	($2)	($1)	($5)
Rider B - State Tax Adjustment	($79)	($102)	($181)	($229)	($246)	($217)	($168)	($129)	($75)	($71)	($37)	($5)	($1,540)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$30,739	$38,868	$66,659	$84,166	$86,918	$73,852	$57,336	$43,796	$25,349	$24,151	$27,466	$36,922	$596,221
Gas Cost Revenues:													
MMT Gas Cost Charge	$1,705	$2,937	$7,090	$9,614	$10,072	$8,129	$5,491	$3,244	$666	$359	$594	$951	$50,852
Rider I - OPEB Surcredit	($421)	($708)	($1,712)	($2,321)	($2,428)	($1,967)	($1,324)	($783)	($161)	($87)	($141)	($225)	($12,277)
Tax Cuts & Jobs Act Refund	($808)	($1,189)	($2,890)	($3,920)	($4,113)	($3,338)	($2,235)	($1,319)	($271)	($146)	($237)	($380)	($20,845)
Priority Standby	$160	$220	$398	$578	$731	$449	$385	$263	$58	$36	$45	$84	$3,406
Total Gas Cost Revenues	$636	$1,259	$2,886	$3,951	$4,262	$3,273	$2,318	$1,405	$293	$162	$261	$430	$21,137
Total Revenues	$31,375	$40,127	$69,545	$88,117	$91,180	$77,125	$59,654	$45,201	$25,642	$24,313	$27,727	$37,352	$617,358

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

SCPA > 250 Sales	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
Customers	2,763	2,788	2,796	2,791	2,783	2,842	2,831	2,827	2,801	2,798	2,775	2,767	33,559
First 20 Mcf	34,677	44,756	53,425	55,467	52,782	54,593	53,543	50,380	26,841	11,928	18,314	25,365	482,070
Over 20 Mcf	17,707	39,609	122,248	163,145	154,942	135,058	87,053	41,108	3,197	5,241	3,561	(133)	772,737
Total Volume	52,384	84,365	175,673	218,612	207,724	189,651	140,596	91,488	30,038	17,170	21,874	25,232	1,254,807
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$74,916	$75,607	$78,545	$79,832	$75,995	$77,739	$78,126	$80,824	$76,703	$78,375	$83,467	$105,394	$965,524
First 20 Mcf	$63,587	$82,106	$98,006	$101,827	$96,823	$100,145	$98,222	$92,420	$49,256	$21,881	$36,088	$52,242	$892,604
Over 20 Mcf	$30,173	$67,560	$208,507	$278,492	$264,278	$230,354	$148,469	$70,120	$5,458	$8,940	$5,573	($286)	$1,317,639
Revenue Rounding	($1)	($21)	($23)	($33)	($44)	($54)	($51)	($38)	($11)	$2	$5	($5)	($274)
Rider B - State Tax Adjustment	($1,593)	($2,472)	($4,980)	($6,150)	($5,721)	($5,126)	($3,864)	($2,579)	($980)	($662)	($376)	$18	($34,483)
Rider E - Customer Education	$0	$2	$10	$6	($0)	$0	($0)	$0	$0	$0	$0	$0	$19
Rider G - Merchant Function Charge	$1,054	$1,663	$3,408	$4,244	$3,753	$3,144	$2,334	$1,468	$449	$259	$269	$248	$22,292
Rider H - Gas Procurement Charge	$5,501	$8,859	$18,447	$22,973	$21,812	$19,914	$14,764	$9,607	$3,155	$1,803	$2,374	$2,901	$132,111
Total Base Non Gas Cost Rate Revenue	$173,637	$233,305	$401,920	$481,192	$456,897	$426,117	$337,999	$251,823	$134,031	$110,598	$127,400	$160,512	$3,295,431
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$417,055	$652,966	$1,322,356	$1,646,773	$1,445,083	$1,197,657	$888,913	$555,572	$168,411	$97,718	$105,537	$102,425	$8,600,467
Rider A - Distribution Charge	$14,842	$23,975	$50,079	$62,370	$59,417	$54,449	$40,365	$27,151	$9,434	$5,330	$6,256	$6,868	$360,537
Rider A - Gas Adjustment Charge	$44,530	$75,795	$171,683	$213,698	$202,949	$185,420	$137,519	$89,201	$28,796	$16,778	($3,518)	($30,996)	$1,131,855
Rider I - OPEB Surcredit	($6,103)	($10,047)	($20,923)	($26,053)	($24,736)	($22,595)	($16,756)	($10,888)	($3,533)	($2,045)	($2,545)	($3,001)	($149,226)
Tax Cuts & Jobs Act Refund	($5,434)	($7,318)	($15,316)	($19,077)	($18,109)	($16,527)	($12,249)	($7,980)	($2,648)	($1,496)	($1,895)	($2,196)	($110,244)
DMT Standby Overrun Charge	($1,760)	($1)	$237	$0	$61	$0	$0	$0	$0	$0	$0	$0	($1,462)
Total Gas Cost Revenues	$463,131	$735,370	$1,508,117	$1,877,711	$1,664,665	$1,398,404	$1,037,792	$653,056	$200,459	$116,284	$103,836	$73,101	$9,831,927
Total Revenues	$636,768	$968,675	$1,910,037	$2,358,903	$2,121,562	$1,824,521	$1,375,792	$904,879	$334,490	$226,882	$231,236	$233,613	$13,127,358

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

SCPA > 250 SATC	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
Customers	355	349	351	357	355	366	354	360	361	360	359	361	4,286
First 20 Mcf	5,036	5,987	6,879	7,293	6,875	7,217	6,789	6,894	4,037	2,243	3,029	4,206	66,487
Over 20 Mcf	2,275	4,715	15,265	21,139	19,498	17,501	10,279	5,097	958	1,234	355	(33)	98,283
Total Volume	7,311	10,702	22,144	28,432	26,373	24,718	17,068	11,992	4,994	3,477	3,385	4,174	164,769
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$9,745	$9,476	$9,713	$10,236	$9,647	$10,034	$9,623	$10,385	$9,703	$10,101	$10,766	$13,672	$123,101
First 20 Mcf	$9,238	$10,983	$12,620	$13,379	$12,612	$13,240	$12,455	$12,648	$7,405	$4,115	$5,938	$8,659	$123,291
Over 20 Mcf	$3,880	$8,041	$26,035	$36,060	$33,256	$29,850	$17,531	$8,694	$1,634	$2,104	$575	($56)	$167,604
Revenue Rounding	$0	($3)	($3)	($4)	($6)	($7)	($7)	($5)	($2)	($1)	$0	($1)	($38)
Rider B - State Tax Adjustment	($59)	($75)	($132)	($163)	($157)	($156)	($116)	($94)	($56)	($49)	($24)	$1	($1,079)
Rider E - Customer Education	$0	$0	$1	$1	$0	$0	$0	$0	$0	$0	$0	$0	$2
Total Base Non Gas Cost Rate Revenue	$22,805	$28,423	$48,234	$59,509	$55,352	$52,961	$39,486	$31,628	$18,684	$16,271	$17,254	$22,274	$412,880
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$162	$237	$492	$629	$586	$549	$380	$268	$111	$77	$63	$66	$3,620
Rider A - Distribution Charge	$2,073	$3,041	$6,313	$8,104	$7,544	$7,095	$4,900	$3,560	$1,558	$1,075	$980	$1,137	$47,379
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($841)	($1,276)	($2,638)	($3,380)	($3,141)	($2,944)	($2,033)	($1,428)	($595)	($414)	($401)	($497)	($19,587)
Tax Cuts & Jobs Act Refund	($769)	($926)	($1,930)	($2,482)	($2,299)	($2,154)	($1,487)	($1,045)	($436)	($303)	($293)	($364)	($14,488)
Total Gas Cost Revenues	$624	$1,077	$2,238	$2,870	$2,689	$2,546	$1,760	$1,355	$638	$435	$349	$342	$16,925
Total Revenues	$23,430	$29,500	$50,472	$62,379	$58,041	$55,507	$41,246	$32,983	$19,322	$16,706	$17,602	$22,617	$429,805

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

SCPA > 250 MMT	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
Customers	1,149	1,137	1,135	1,150	1,170	1,185	1,198	1,197	1,200	1,198	1,213	1,217	14,146
All Mcf	28,007	42,572	86,268	112,314	107,056	93,164	74,111	45,763	19,309	10,526	11,913	14,806	645,809
Total Volume	28,007	42,572	86,268	112,314	107,056	93,164	74,111	45,763	19,309	10,526	11,913	14,806	645,809
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$31,284	$31,131	$31,636	$32,901	$31,931	$32,334	$32,948	$34,399	$32,663	$33,179	$36,495	$46,067	$406,967
All Mcf	$52,219	$79,375	$160,842	$209,404	$199,604	$173,704	$138,177	$85,324	$36,010	$19,627	$23,296	$30,339	$1,207,921
Revenue Rounding	($0)	$0	$0	($0)	$0	$0	$0	($0)	($0)	($1)	($2)	($0)	($3)
Rider B - State Tax Adjustment	($226)	($309)	($555)	($700)	($689)	($640)	($528)	($373)	($216)	($162)	($93)	($2)	($4,494)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$83,277	$110,197	$191,923	$241,605	$230,847	$205,399	$170,596	$119,350	$68,456	$52,642	$59,697	$76,404	$1,610,391
Gas Cost Revenues:													
MMT Gas Cost Charge	$10,081	$15,325	$31,052	$40,430	$38,540	$33,539	$26,679	$16,474	$6,956	$3,789	$4,344	$5,474	$232,683
Rider I - OPEB Surcredit	($3,137)	($4,832)	($9,795)	($12,754)	($12,150)	($10,572)	($8,414)	($5,193)	($2,182)	($1,194)	($1,360)	($1,680)	($73,262)
Tax Cuts & Jobs Act Refund	($2,916)	($3,693)	($7,491)	($9,754)	($9,301)	($8,095)	($6,437)	($3,976)	($1,686)	($914)	($1,030)	($1,287)	($56,581)
Priority Standby	$2,959	$4,557	$7,377	$9,091	$8,043	$7,522	$5,742	$4,052	$2,413	$1,292	$1,189	$1,654	$55,890
Total Gas Cost Revenues	$6,987	$11,357	$21,144	$27,014	$25,131	$22,393	$17,570	$11,357	$5,500	$2,973	$3,143	$4,161	$158,729
Total Revenues	$90,263	$121,554	$213,067	$268,619	$255,978	$227,792	$188,166	$130,707	$73,956	$55,616	$62,839	$80,565	$1,769,121

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
LCPA Sales													
Customers	530	506	500	493	486	488	481	478	475	479	491	485	5,889
First 300 Mcf	38,631	56,902	95,751	101,512	97,350	93,064	77,900	54,267	24,651	15,875	16,439	19,299	691,640
300 - 2000 Mcf	2,159	6,748	24,880	27,245	29,220	20,273	14,498	4,622	463	1,115	548	(742)	131,030
Over 2000 Mcf	0	0	0	200	0	163	0	0	0	0	0	0	363
Total Volume	40,790	63,650	120,631	128,957	126,571	113,500	92,398	58,889	25,114	16,990	16,987	18,557	823,033
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$61,718	$61,458	$61,305	$61,346	$58,975	$58,246	$58,353	$59,790	$56,655	$58,718	$62,196	$74,359	$733,119
First 300 Mcf	$57,738	$85,057	$143,331	$154,424	$145,521	$139,112	$116,445	$81,119	$36,848	$23,729	$26,079	$32,205	$1,041,609
300 - 2000 Mcf	$2,982	$9,321	$34,637	$37,959	$40,359	$28,001	$20,024	$6,384	$639	$1,540	$755	($1,125)	$181,476
Over 2000 Mcf	$0	$0	$0	$246	$0	$201	$0	$0	$0	$0	$0	$0	$447
Revenue Rounding	($1)	($0)	($1)	($0)	($1)	($1)	($1)	($1)	($1)	($1)	$0	($0)	($8)
Rider B - State Tax Adjustment	($1,201)	($1,834)	($3,287)	($3,641)	($3,457)	($3,030)	($2,498)	($1,643)	($777)	($586)	($348)	$39	($22,263)
Rider E - Customer Education	$4	$6	$11	$8	$0	$0	$0	$0	$0	($0)	$0	$0	$29
Rider G - Merchant Function Charge	$813	$1,259	$2,225	$2,542	$2,318	$1,885	$1,534	$949	$376	$258	$226	$175	$14,560
Rider H - Gas Procurement Charge	$4,283	$6,684	$12,666	$13,754	$13,290	$11,918	$9,702	$6,184	$2,637	$1,784	$1,876	$2,139	$86,919
Total Base Non Gas Cost Rate Revenue	$126,337	$161,951	$250,887	$266,639	$257,006	$236,331	$203,559	$152,781	$96,378	$85,442	$90,784	$107,792	$2,035,887
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$322,400	$495,153	$872,233	$986,366	$893,785	$718,166	$584,274	$359,374	$140,627	$96,458	$87,441	$72,961	$5,629,239
Rider A - Distribution Charge	$11,558	$18,082	$34,403	$37,348	$36,185	$32,582	$26,528	$17,398	$7,864	$5,267	$5,048	$5,012	$237,277
Rider I - OPEB Surcredit	($5,952)	($5,805)	($10,324)	($11,924)	($11,534)	($10,374)	($8,424)	($5,369)	($2,290)	($1,547)	($1,568)	($1,685)	($76,796)
Tax Cuts & Jobs Act Refund	($4,913)	($4,650)	($9,260)	($9,549)	($9,236)	($8,310)	($6,748)	($4,301)	($1,834)	($1,239)	($1,256)	($1,350)	($62,648)
DMT Standby Overrun Charge	($4,434)	$0	$0	$0	$0	$0	$0	$108	$23	$70	($268)	$0	($4,501)
Total Gas Cost Revenues	$352,557	$559,463	$990,314	$1,130,449	$1,032,972	$842,768	$685,922	$424,748	$168,931	$115,627	$90,798	$49,810	$6,444,360
Total Revenues	$478,894	$721,414	$1,241,201	$1,397,088	$1,289,977	$1,079,099	$889,481	$577,529	$265,310	$201,070	$181,583	$157,602	$8,480,247

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

LCPA SATC	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
Customers	34	34	37	39	40	37	39	40	41	42	44	46	473
First 300 Mcf	2,172	3,385	6,431	7,958	8,091	6,683	6,403	4,841	2,704	2,222	2,051	2,378	55,319
300 - 2000 Mcf	4	437	178	1,096	693	791	254	33	0	0	0	0	3,486
Over 2000 Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Volume	2,176	3,822	6,609	9,054	8,784	7,473	6,658	4,874	2,704	2,222	2,051	2,378	58,804
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$3,988	$4,051	$4,564	$4,875	$4,961	$4,335	$4,698	$5,203	$4,598	$5,623	$5,320	$7,113	$59,330
First 300 Mcf	$3,247	$5,060	$9,612	$11,896	$12,094	$9,989	$9,572	$7,236	$4,043	$3,322	$3,243	$3,963	$83,276
300 - 2000 Mcf	$5	$604	$246	$1,513	$957	$1,092	$351	$46	$0	$0	$0	$0	$4,814
Over 2000 Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Revenue Rounding	($0)	$0	($0)	$0	($0)	($0)	($0)	$0	$0	($0)	$0	($0)	($0)
Rider B - State Tax Adjustment	($18)	($26)	($40)	($51)	($52)	($46)	($44)	($38)	($27)	($27)	($13)	$0	($380)
Rider E - Customer Education	$0	$0	$1	$1	$0	$0	$0	$0	$0	$0	$0	$0	$2
Total Base Non Gas Cost Rate Revenue	$7,222	$9,689	$14,383	$18,233	$17,960	$15,370	$14,577	$12,447	$8,614	$8,918	$8,551	$11,076	$147,041
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$48	$84	$146	$200	$194	$165	$147	$108	$60	$49	$39	$37	$1,277
Rider A - Distribution Charge	$617	$1,086	$1,884	$2,581	$2,511	$2,146	$1,911	$1,443	$846	$687	$596	$647	$16,956
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($315)	($339)	($603)	($825)	($801)	($681)	($607)	($444)	($247)	($203)	($187)	($217)	($5,468)
Tax Cuts & Jobs Act Refund	($259)	($271)	($483)	($661)	($642)	($546)	($486)	($356)	($198)	($162)	($150)	($174)	($4,387)
Total Gas Cost Revenues	$91	$561	$945	$1,295	$1,263	$1,084	$965	$750	$462	$371	$298	$294	$8,378
Total Revenues	$7,313	$10,250	$15,328	$19,528	$19,223	$16,454	$15,542	$13,197	$9,076	$9,289	$8,849	$11,371	$155,420

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
LCPA MMT													
Customers	991	998	1,012	1,016	1,024	1,035	1,036	1,035	1,033	1,030	1,028	1,028	12,263
All Mcf	156,684	340,928	500,393	689,677	646,684	600,045	592,843	357,002	228,990	146,800	103,999	129,557	4,493,601
Total Volume	156,684	340,928	500,393	689,677	646,684	600,045	592,843	357,002	228,990	146,800	103,999	129,557	4,493,601
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$118,313	$120,004	$123,677	$124,538	$124,640	$123,702	$125,425	$125,072	$125,203	$124,659	$128,360	$155,412	$1,519,005
All Mcf	$221,624	$482,575	$708,694	$976,730	$915,750	$849,671	$839,530	$505,494	$324,295	$207,899	$150,211	$214,549	$6,397,022
Revenue Rounding	$0	$0	($0)	$0	$0	($0)	$0	$0	$0	$0	($0)	$0	$1
Rider B - State Tax Adjustment	($984)	($1,857)	($2,624)	($3,480)	($3,320)	($3,308)	($3,283)	($2,140)	($1,554)	($1,118)	($770)	($15)	($24,455)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$338,953	$600,722	$829,746	$1,097,789	$1,037,071	$970,066	$961,672	$628,427	$447,944	$331,440	$277,800	$369,946	$7,891,574
Gas Cost Revenues:													
MMT Gas Cost Charge	$56,543	$123,001	$180,086	$248,282	$232,886	$216,185	$213,458	$128,619	$82,436	$52,848	$37,559	$47,929	$1,619,834
Rider I - OPEB Surcredit	($17,369)	($38,243)	($56,985)	($78,468)	($73,776)	($68,085)	($67,369)	($40,478)	($26,050)	($16,700)	($11,831)	($14,718)	($510,071)
Tax Cuts & Jobs Act Refund	($13,133)	($20,519)	($29,410)	($40,639)	($38,058)	($35,576)	($34,988)	($21,176)	($13,495)	($8,651)	($6,128)	($7,667)	($269,440)
Priority Standby	$30,443	$65,322	$84,306	$107,845	$104,652	$93,824	$96,469	$63,330	$43,174	$25,798	$22,740	$25,634	$763,538
Total Gas Cost Revenues	$56,484	$129,562	$177,996	$237,020	$225,705	$206,349	$207,571	$130,295	$86,066	$53,295	$42,339	$51,178	$1,603,860
Total Revenues	$395,436	$730,284	$1,007,743	$1,334,809	$1,262,775	$1,176,414	$1,169,243	$758,722	$534,010	$384,735	$320,139	$421,124	$9,495,434
Unit Margin ($/Mcf)	$2.1633	$1.7620	$1.6582	$1.5917	$1.6037	$1.6167	$1.6221	$1.7603	$1.9562	$2.2578	$2.6712	$2.8555	$1.7562
Per Book Revenue	$395,436	$730,284	$1,007,743	$1,334,809	$1,262,775	$1,176,414	$1,169,243	$758,722	$534,010	$384,735	$320,139	$421,124	$9,495,434
Variance (Total Revenues - Per Book)	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Percent Variance	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

LCPA DMT	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
Customers	15	15	15	15	15	15	15	15	15	15	15	15	180
Transportation Volumes	56,132	76,065	88,623	104,455	105,145	93,022	101,335	78,133	64,511	56,316	52,875	55,387	931,998
Sales - First 300 Mcf	300	(300)	0	571	0	69	0	0	0	0	0	0	640
Sales - 300 - 2000 Mcf	1,700	(1,700)	0	666	0	0	0	0	0	0	0	0	666
Sales - Over 2000 Mcf	262	(262)	0	0	0	0	0	0	0	0	0	0	0
Total Volume	58,394	73,803	88,623	105,692	105,145	93,091	101,335	78,133	64,511	56,316	52,875	55,387	933,305
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$1,815	$1,815	$1,815	$1,815	$1,815	$1,815	$1,815	$1,815	$1,815	$1,815	$1,815	$2,265	$22,232
Transportation Volumes	$79,494	$107,723	$125,508	$147,929	$148,907	$131,737	$143,510	$110,652	$91,360	$79,754	$74,881	$92,065	$1,333,521
Sales - First 300 Mcf	$448	($448)	$0	$853	$0	$104	$0	$0	$0	$0	$0	$0	$957
Sales - 300 - 2000 Mcf	$2,348	($2,348)	$0	$920	$0	$0	$0	$0	$0	$0	$0	$0	$920
Sales - Over 2000 Mcf	$322	($322)	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Revenue Rounding	$0	$0	$0	$0	$0	($0)	$0	$0	$0	$0	$0	$0	($0)
Rider B - State Tax Adjustment	($251)	($191)	($309)	($404)	($368)	($355)	($376)	($297)	($260)	($226)	($210)	$0	($3,247)
Rider E - Customer Education	$0	($0)	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$45	($45)	$0	$24	$0	$1	$0	$0	$0	$0	$0	$0	$25
Rider H - Gas Procurement Charge	$238	($238)	$0	$130	$0	$7	$0	$0	$0	$0	$0	$0	$137
Total Base Non Gas Cost Rate Revenue	$84,460	$105,945	$127,014	$151,268	$150,354	$133,310	$144,950	$112,170	$92,915	$81,343	$76,486	$94,330	$1,354,545
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$17,918	($17,918)	$0	$9,314	$0	$438	$0	$0	$0	$0	$0	$0	$9,752
Rider A - Distribution Charge	$641	($641)	$0	$353	$0	$20	$0	$0	$0	$0	$0	$0	$373
Rider A - Gas Adjustment Charge	$1,896	($1,896)	$0	$1,209	$0	$68	$0	$0	$0	$0	$0	$0	$1,277
Rider I - OPEB Surcredit	($6,254)	($8,411)	($10,082)	($12,024)	($11,961)	($10,590)	($11,528)	($8,888)	($7,339)	($6,406)	($6,015)	($6,301)	($105,799)
Tax Cuts & Jobs Act Refund	($5,145)	($4,283)	($5,223)	($6,228)	($6,196)	($5,486)	($5,972)	($4,604)	($3,802)	($3,319)	($3,116)	($3,264)	($56,638)
DMT Standby Overrun Charges	$2,342	($2,342)	$0	$3,147	$0	$156	$0	$0	$0	$0	$0	$0	$3,304
Market Rate Differential	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Overdelivery Charges	$4,374	$5,836	$6,997	$7,811	$8,878	$8,351	$6,433	$7,269	$7,480	$6,236	$4,841	$4,064	$78,570
Total Gas Cost Revenues	$15,772	($29,656)	($8,308)	$3,582	($9,280)	($7,043)	($11,066)	($6,223)	($3,660)	($3,489)	($4,290)	($5,501)	($69,161)
Total Revenues	$100,233	$76,290	$118,706	$154,851	$141,075	$126,267	$133,883	$105,947	$89,255	$77,854	$72,196	$88,829	$1,285,385

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
PA NGV													
Customers	8	8	8	8	9	7	7	7	7	7	7	7	90
All Mcf	11,963	11,875	12,022	12,108	11,632	10,481	10,694	9,500	9,450	9,091	8,989	10,013	127,818
Total Volume	11,963	11,875	12,022	12,108	11,632	10,481	10,694	9,500	9,450	9,091	8,989	10,013	127,818
Base Non Gas Cost Rate Revenue:													
Margin	$3,589	$3,563	$3,607	$3,632	$3,490	$3,144	$3,208	$2,852	$9,450	$9,091	$8,989	$10,013	$64,628
Revenue Rounding	($0)	$0	$0	$0	$0	$0	$0	$0	$0	$0	($0)	($0)	$0
Rider B - State Tax Adjustment	($256.0)	($254.1)	($259.7)	($261.5)	($251.3)	($207.5)	($211.7)	($188.1)	($196.6)	($189.1)	($186.7)	$0.0	($2,462.3)
Total Base Non Gas Cost Rate Revenue	$3,333	$3,308	$3,347	$3,371	$3,238	$2,937	$2,996	$2,664	$9,253	$8,902	$8,802	$10,013	$62,165
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$78,870	$78,289	$74,515	$75,048	$72,095	$51,922	$52,977	$47,060	$40,871	$39,319	$38,856	$27,791	$677,612
Rider A - Distribution Charge	$8,857	$8,792	$8,920	$8,984	$8,631	$7,990	$8,152	$7,242	$7,486	$7,202	$7,121	$7,587	$96,964
Rider A - Gas Adjustment Charge	$10,995	$10,914	$12,692	$12,782	$12,280	$11,065	$11,290	$10,029	$9,976	$9,597	$9,458	($12,357)	$108,722
Tax Cuts & Jobs Act Refund	($1,978)	($867)	($878)	($884)	($850)	($766)	($781)	($694)	($690)	($664)	($657)	($731)	($10,440)
Total Gas Cost Revenues	$96,744	$97,128	$95,249	$95,930	$92,156	$70,211	$71,638	$63,637	$57,644	$55,454	$54,777	$22,290	$872,858
Total Revenues	$100,077	$100,437	$98,596	$99,301	$95,395	$73,148	$74,634	$66,301	$66,897	$64,356	$63,580	$32,303	$935,023

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
SVIS Sales													
Customers	115	115	114	117	118	120	120	117	115	115	113	114	1,391
All Mcf	875	3,069	8,024	11,078	11,352	8,238	7,428	6,281	5,162	1,309	3,134	1,627	67,578
Total Volume	875	3,069	8,024	11,078	11,352	8,238	7,428	6,281	5,162	1,309	3,134	1,627	67,578
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$7,247	$7,613	$7,732	$7,628	$7,955	$7,628	$7,881	$8,028	$7,444	$7,502	$7,626	$9,671	$93,955
All Mcf	$1,797	$6,300	$16,474	$22,744	$23,319	$16,914	$15,251	$12,896	$10,598	$2,688	$6,493	$3,373	$138,847
Revenue Rounding	($0)	($0)	$0	($0)	($0)	($0)	($0)	($0)	$0	$1	$0	$0	($0)
Rider B - State Tax Adjustment	($42)	($104)	($245)	($330)	($333)	($242)	($221)	($190)	($155)	($56)	($13)	$1	($1,929)
Rider E - Customer Education	$0	$0	$1	$1	$0	$0	$0	$0	$0	$0	$0	$0	$2
Rider G - Merchant Function Charge	$18	$61	$156	$215	$207	$137	$123	$102	$78	$20	$31	$16	$1,163
Rider H - Gas Procurement Charge	$92	$322	$843	$1,163	$1,192	$865	$780	$660	$542	$137	$360	$187	$7,144
Total Base Non Gas Cost Rate Revenue	$9,111	$14,192	$24,960	$31,421	$32,340	$25,301	$23,814	$21,495	$18,507	$10,291	$14,498	$13,248	$239,181
Gas Cost Revenues:													
	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider A - Natural Gas Supply Charge	$6,946	$23,839	$60,405	$83,393	$80,119	$52,086	$46,980	$38,787	$29,012	$7,500	$12,943	$6,638	$448,649
Rider A - Distribution Charge	$248	$872	$2,288	$3,158	$3,237	$2,365	$2,133	$1,838	$1,605	$405	$857	$443	$19,449
Rider A - Gas Adjustment Charge	$740	$2,739	$7,841	$10,826	$10,629	$8,050	$7,259	$6,138	$5,044	$1,279	($3,637)	($2,002)	$54,906
Rider I - OPEB Surcredit	($47)	($211)	($553)	($761)	($761)	($566)	($511)	($432)	($355)	($90)	($215)	($112)	($4,613)
Tax Cuts & Jobs Act Refund	($141)	($428)	($1,118)	($1,546)	($1,611)	($1,150)	($1,037)	($877)	($721)	($183)	($437)	($227)	($9,475)
Standby Overrun	($15)	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	($15)
Bypass Service	$6	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$6
Total Gas Cost Revenues	$7,737	$26,810	$68,863	$95,070	$91,613	$60,786	$54,824	$45,456	$34,587	$8,911	$9,510	$4,740	$508,907
Total Revenues	$16,848	$41,002	$93,823	$126,491	$123,954	$86,087	$78,639	$66,951	$53,094	$19,202	$24,008	$17,989	$748,088

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
SVIS SATC													
Customers	16	16	16	16	16	16	16	17	14	14	14	14	185
All Mcf	84	309	988	1,828	1,050	1,308	1,220	461	127	50	47	44	7,516
Total Volume	84	309	988	1,828	1,050	1,308	1,220	461	127	50	47	44	7,516
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$984	$1,022	$1,064	$1,128	$984	$1,050	$1,039	$1,088	$918	$918	$975	$1,228	$12,398
All Mcf	$172	$635	$2,029	$3,752	$2,157	$2,685	$2,508	$946	$260	$102	$96	$91	$15,434
Revenue Rounding	($0)	$0	($0)	$0	($0)	$0	$0	($0)	($0)	$0	$0	($0)	($0)
Rider B - State Tax Adjustment	($3)	($4)	($8)	($13)	($9)	($11)	($10)	($6)	($3)	($3)	($2)	($0)	($73)
Rider E - Customer Education	$0	$0	$0	$0	($0)	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$1,154	$1,652	$3,084	$4,868	$3,132	$3,724	$3,537	$2,028	$1,175	$1,017	$1,070	$1,319	$27,760
Gas Cost Revenues:													
	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider A - Natural Gas Supply Charge	$2	$7	$22	$40	$23	$29	$24	$10	$3	$1	$1	$1	$163
Rider A - Distribution Charge	$24	$88	$282	$521	$300	$376	$347	$135	$39	$15	$14	$12	$2,152
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($4)	($21)	($68)	($126)	($72)	($90)	($76)	($32)	($9)	($3)	($3)	($3)	($506)
Tax Cuts & Jobs Act Refund	($15)	($43)	($138)	($255)	($147)	($183)	($182)	($64)	($18)	($7)	($7)	($6)	($1,064)
Total Gas Cost Revenues	$7	$30	$98	$181	$105	$132	$112	$49	$16	$6	$5	$4	$744
Total Revenues	$1,161	$1,683	$3,182	$5,048	$3,237	$3,856	$3,650	$2,077	$1,191	$1,023	$1,075	$1,323	$28,504

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
SVIS MMT													
Customers	61	62	65	64	62	61	57	58	56	56	56	56	712
All Mcf	838	2,151	5,854	8,695	8,215	6,794	3,758	1,835	401	121	108	215	38,983
Total Volume	838	2,151	5,854	8,695	8,215	6,794	3,758	1,835	401	121	108	215	38,983
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$3,924	$3,965	$4,271	$4,335	$3,835	$3,901	$3,674	$3,814	$3,674	$3,531	$3,841	$4,751	$47,513
All Mcf	$1,815	$4,658	$12,678	$18,830	$17,791	$14,713	$8,139	$3,974	$869	$261	$228	$444	$84,399
Revenue Rounding	($0)	$0	($0)	$0	($0)	$0	$0	($0)	$0	$0	($0)	($0)	$0
Rider B - State Tax Adjustment	($15)	($23)	($47)	($65)	($62)	($56)	($35)	($23)	($13)	($11)	($6)	($0)	($358)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$5,725	$8,600	$16,901	$23,100	$21,563	$18,557	$11,777	$7,765	$4,529	$3,781	$4,062	$5,195	$131,555
Gas Cost Revenues:													
MMT Gas Cost Charge	$302	$774	$2,107	$3,130	$2,957	$2,446	$1,353	$661	$144	$43	$40	$79	$14,037
Rider I - OPEB Surcredit	($30)	($52)	($140)	($209)	($197)	($163)	($90)	($44)	($10)	($3)	($3)	($5)	($945)
Tax Cuts & Jobs Act Refund	($160)	($273)	($741)	($1,100)	($1,040)	($860)	($476)	($232)	($51)	($15)	($14)	($27)	($4,988)
Priority Standby	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Gas Cost Revenues	$112	$450	$1,226	$1,821	$1,721	$1,423	$787	$384	$84	$25	$23	$47	$8,103
Total Revenues	$5,837	$9,050	$18,128	$24,921	$23,284	$19,980	$12,564	$8,149	$4,613	$3,806	$4,085	$5,242	$139,659

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
IVIS Sales													
Customers	69	63	59	59	60	58	57	58	57	56	57	58	708
First 100 Mcf	2,519	4,679	5,471	5,232	5,627	6,368	4,996	4,258	2,766	853	2,385	3,368	48,521
100 - 2000 Mcf	5,690	11,031	15,901	18,524	24,045	21,761	11,837	6,577	1,235	2,588	1,538	1,040	121,766
Over 2000 Mcf	(38)	1,105	1,135	2,618	2,514	2,274	2,188	203	0	0	0	0	11,999
Total Volume	8,171	16,815	22,506	26,374	32,186	30,403	19,021	11,038	4,001	3,441	3,922	4,408	182,286
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$12,317	$12,304	$13,320	$11,660	$11,745	$11,668	$11,675	$12,281	$11,105	$11,913	$11,215	$15,628	$146,830
First 100 Mcf	$3,765	$6,994	$8,178	$8,174	$8,528	$9,520	$7,468	$6,365	$4,135	$1,274	$3,290	$4,504	$72,195
100 - 2000 Mcf	$6,259	$12,133	$17,489	$21,685	$26,447	$23,939	$13,019	$7,233	$1,356	$2,847	$1,691	$1,144	$135,242
Over 2000 Mcf	($30)	$874	$898	$2,070	$1,988	$1,798	$1,730	$161	$0	$0	$0	$0	$9,489
Revenue Rounding	$0	($0)	($0)	$0	($0)	($0)	($0)	$0	($0)	($0)	$0	($0)	($1)
Rider B - State Tax Adjustment	($213)	($459)	($613)	($744)	($849)	($765)	($492)	($304)	($130)	($116)	($74)	($26)	($4,784)
Rider E - Customer Education	$1	$2	$2	$2	$0	$0	($0)	$0	($0)	$0	$0	$0	$7
Rider G - Merchant Function Charge	$165	$334	$437	$540	$607	$498	$309	$181	$63	$53	$51	$50	$3,288
Rider H - Gas Procurement Charge	$858	$1,766	$2,363	$2,919	$3,388	$3,192	$1,997	$1,159	$420	$361	$429	$496	$19,349
Total Base Non Gas Cost Rate Revenue	$23,122	$33,947	$42,073	$46,308	$51,855	$49,850	$35,707	$27,076	$16,948	$16,331	$16,603	$21,796	$381,615
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$65,239	$132,000	$169,694	$209,498	$234,910	$192,237	$117,453	$68,824	$22,019	$19,677	$19,727	$19,930	$1,271,208
Rider A - Distribution Charge	$2,319	$4,772	$6,416	$7,929	$9,212	$8,657	$5,466	$3,203	$1,329	$1,065	$1,151	$1,244	$52,761
Rider I - OPEB Surcredit	($656)	($2,225)	($2,988)	($3,704)	($4,285)	($3,715)	($2,526)	($1,466)	($712)	($457)	($521)	($585)	($23,841)
Tax Cuts & Jobs Act Refund	($729)	($1,175)	($1,569)	($1,934)	($2,248)	($2,197)	($1,326)	($769)	($237)	($240)	($273)	($307)	($13,004)
DMT Standby Overrun Charges	($10,136)	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	($10,136)
Total Gas Cost Revenues	$63,125	$147,891	$193,453	$239,077	$269,117	$221,662	$137,702	$80,578	$27,875	$23,408	$20,223	$17,449	$1,441,559
Total Revenues	$86,246	$181,838	$235,526	$285,384	$320,972	$271,512	$173,409	$107,654	$44,823	$39,740	$36,825	$39,245	$1,823,175

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

IVIS SATC	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
Customers	3	3	3	3	2	3	4	4	4	4	4	4	41
First 100 Mcf	266	300	318	318	200	282	400	400	195	131	111	171	3,093
100 - 2000 Mcf	148	265	505	713	448	795	1,063	442	5	6	0	0	4,389
Over 2000 Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Volume	414	565	823	1,031	648	1,077	1,463	842	200	137	111	171	7,482
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$606	$606	$643	$643	$404	$570	$808	$808	$808	$772	$878	$1,008	$8,551
First 100 Mcf	$398	$448	$476	$476	$299	$422	$598	$598	$291	$196	$164	$228	$4,595
100 - 2000 Mcf	$163	$291	$555	$784	$493	$874	$1,169	$486	$6	$7	$0	$0	$4,827
Over 2000 Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Revenue Rounding	($0)	$0	($0)	($0)	($0)	$0	$0	$0	$0	($0)	$0	$0	$0
Rider B - State Tax Adjustment	($3)	($4)	($5)	($5)	($3)	($6)	($8)	($6)	($3)	($3)	($2)	$0	($47)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$1,163	$1,342	$1,669	$1,897	$1,192	$1,860	$2,567	$1,886	$1,101	$972	$1,040	$1,236	$17,927
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$9	$12	$18	$23	$14	$24	$32	$19	$4	$3	$2	$3	$164
Rider A - Distribution Charge	$117	$160	$235	$294	$185	$309	$420	$247	$62	$42	$34	$47	$2,153
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($32)	($75)	($109)	($137)	($86)	($143)	($194)	($112)	($27)	($18)	($15)	($23)	($970)
Tax Cuts & Jobs Act Refund	($38)	($40)	($57)	($72)	($45)	($75)	($102)	($59)	($14)	($10)	($8)	($12)	($530)
Total Gas Cost Revenues	$57	$59	$86	$108	$68	$115	$156	$95	$26	$18	$14	$15	$817
Total Revenues	$1,220	$1,401	$1,755	$2,005	$1,260	$1,975	$2,723	$1,982	$1,127	$989	$1,054	$1,251	$18,744

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

IVIS MMT	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
Customers	261	260	269	267	268	271	272	271	273	274	272	271	3,228
All Mcf	165,412	194,976	225,069	279,444	270,866	252,224	277,771	173,844	150,304	138,463	150,224	132,454	2,411,050
Total Volume	165,412	194,976	225,069	279,444	270,866	252,224	277,771	173,844	150,304	138,463	150,224	132,454	2,411,050
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$52,498	$51,985	$55,271	$54,492	$53,304	$54,444	$54,723	$55,219	$56,132	$55,932	$57,243	$68,590	$669,833
All Mcf	$152,083	$180,433	$231,210	$298,296	$289,935	$269,980	$297,338	$181,392	$147,522	$123,889	$128,351	$138,584	$2,439,012
DUAL IVIS Margin	$1,138	$1,138	$883	$1,393	$1,136	$255	$255	$255	$1,005	$1,005	$1,005	$1,005	$10,475
LBS Demand Margin	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
LBS Commodity Margin	$8,892	$10,070	$3,452	$317	$0	$0	$0	$1,606	$4,216	$7,507	$9,978	$8,957	$54,995
Revenue Rounding	$0	($0)	($0)	($0)	$0	$0	$0	($0)	$0	$0	($0)	$0	$0
Rider B - State Tax Adjustment	($662)	($743)	($902)	($1,095)	($1,071)	($1,080)	($1,176)	($787)	($714)	($650)	($656)	$9	($9,528)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$213,949	$242,884	$289,914	$353,402	$343,304	$323,599	$351,139	$237,684	$208,162	$187,683	$195,922	$217,146	$3,164,788
Gas Cost Revenues:													
MMT Gas Cost Charge	$60,086	$70,247	$81,025	$100,465	$97,512	$90,801	$100,188	$62,582	$54,109	$49,847	$54,099	$49,032	$869,992
Rider A - Natural Gas Supply Charge	$1,226	$1,226	$1,230	$1,230	$1,230	$0	$0	$0	$0	$0	$0	$0	$6,142
Rider A - Distribution Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($8,231)	($11,129)	($14,540)	($19,154)	($18,237)	($16,877)	($18,246)	($11,350)	($9,347)	($7,873)	($8,121)	($7,045)	($150,150)
Tax Cuts & Jobs Act Refund	($10,397)	($9,107)	($11,496)	($14,700)	($14,419)	($13,344)	($14,876)	($8,972)	($7,370)	($6,204)	($6,400)	($5,550)	($122,835)
Priority Standby	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Gas Cost Revenues	$42,683	$51,236	$56,219	$67,841	$66,087	$60,580	$67,066	$42,259	$37,392	$35,769	$39,578	$36,437	$603,148
Total Revenues	$256,632	$294,120	$346,133	$421,244	$409,391	$384,179	$418,205	$279,944	$245,554	$223,452	$235,500	$253,583	$3,767,936

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

IVIS DMT	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
Customers	23	23	23	23	23	23	23	23	23	22	22	23	274
Transportation Volume	43,915	58,164	69,854	84,863	90,166	80,279	85,299	58,817	51,887	41,091	36,743	45,604	746,680
Sales - First 100 Mcf	0	21	5	255	0	30	0	0	58	0	0	0	369
Sales - 100 - 2000 Mcf	0	0	0	36	0	0	0	0	0	0	0	0	36
Sales - Over 2000 Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Volume	43,915	58,185	69,859	85,153	90,166	80,308	85,299	58,817	51,944	41,091	36,743	45,604	747,084
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$4,644	$4,644	$4,644	$4,644	$4,644	$4,644	$4,644	$4,644	$4,637	$4,442	$4,442	$5,796	$56,469
Transportation Volume	$47,006	$62,258	$74,772	$90,837	$96,514	$85,930	$91,304	$62,958	$55,539	$43,984	$39,329	$60,868	$811,299
Sales - First 100 Mcf	$0	$32	$7	$381	$0	$44	$0	$0	$86	$0	$0	$0	$551
Sales - 100 - 2000 Mcf	$0	$0	$0	$39	$0	$0	$0	$0	$0	$0	$0	$0	$39
Sales - Over 2000 Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Revenue Rounding	$0	($0)	$0	($0)	$0	($0)	$0	$0	($0)	$0	$0	$0	($0)
Rider B - State Tax Adjustment	($126)	($166)	($206)	($256)	($279)	($256)	($262)	($200)	($186)	($144)	($132)	$0	($2,213)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$0	$0	$0	$6	$0	$0	$0	$0	$1	$0	$0	$0	$8
Rider H - Gas Procurement Charge	$0	$2	$1	$31	$0	$3	$0	$0	$6	$0	$0	$0	$42
Total Base Non Gas Cost Rate Revenue	$51,524	$66,770	$79,218	$95,682	$100,879	$90,366	$95,685	$67,402	$60,084	$48,282	$43,639	$66,664	$866,195
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$0	$167	$37	$2,189	$0	$188	$0	$0	$331	$0	$0	$0	$2,912
Rider A - Distribution Charge	$0	$6	$1	$83	$0	$9	$0	$0	$18	$0	$0	$0	$117
Rider A - Gas Adjustment Charge	$0	$18	$5	$284	$0	$29	$0	$0	$56	$0	$0	$0	$392
Rider I - OPEB Surcredit	($2,665)	($3,886)	($4,665)	($5,687)	($6,021)	($5,363)	($5,696)	($3,928)	($3,473)	($2,744)	($2,454)	($3,045)	($49,627)
Tax Cuts & Jobs Act Refund	($3,184)	($3,072)	($3,689)	($4,496)	($4,761)	($4,240)	($4,504)	($3,106)	($2,744)	($2,170)	($1,940)	($2,408)	($40,313)
DMT Standby Overrun Charges	$0	$22	$13	$745	$0	$67	$0	$0	$49	$0	$0	$0	$896
Overdelivery Charges	$4,593	$6,299	$8,054	$9,357	$17,020	$10,028	$7,858	$10,880	$9,666	$6,002	$6,256	$6,016	$102,030
Total Gas Cost Revenues	($1,256)	($446)	($244)	$2,476	$6,238	$717	($2,342)	$3,847	$3,903	$1,088	$1,863	$563	$16,407
Total Revenues	$50,268	$66,324	$78,974	$98,158	$107,117	$91,083	$93,344	$71,249	$63,987	$49,370	$45,501	$67,226	$882,602

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
LVIS MMT													
Customers	8	8	8	8	8	8	9	9	9	9	9	9	102
All Mcf	39,415	39,498	42,050	55,617	47,086	49,112	51,396	44,448	48,888	53,651	56,420	56,624	584,204
Total Volume	39,415	39,498	42,050	55,617	47,086	49,112	51,396	44,448	48,888	53,651	56,420	56,624	584,204
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$6,472	$6,472	$6,472	$6,472	$6,472	$6,472	$6,472	$6,472	$6,472	$6,472	$6,472	$8,184	$79,376
All Mcf	$31,871	$31,938	$34,001	$44,972	$38,073	$39,712	$41,559	$35,941	$39,531	$43,382	$45,621	$58,000	$484,601
Bypass Service	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Revenue Rounding	$0	$0	$0	($0)	$0	$0	$0	$0	($0)	($0)	($0)	$0	$0
Rider B - State Tax Adjustment	($120)	($124)	($136)	($174)	($150)	($168)	($175)	($154)	($173)	($188)	($197)	$0	($1,759)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$38,223	$38,286	$40,338	$51,269	$44,395	$46,016	$47,856	$42,259	$45,830	$49,666	$51,896	$66,184	$562,218
Gas Cost Revenues:													
MMT Gas Cost Charge	$14,190	$14,219	$15,138	$20,022	$16,951	$17,680	$18,503	$16,001	$17,600	$19,314	$20,311	$20,951	$210,880
Rider I - OPEB Surcredit	($2,399)	($2,704)	($2,879)	($3,808)	($3,223)	($3,362)	($3,519)	($3,043)	($3,347)	($3,673)	($3,863)	($3,876)	($39,695)
Tax Cuts & Jobs Act Refund	($2,122)	($431)	($458)	($606)	($513)	($535)	($560)	($484)	($533)	($585)	($615)	($617)	($8,060)
Priority Standby	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Gas Cost Revenues	$9,669	$11,085	$11,801	$15,608	$13,214	$13,783	$14,424	$12,474	$13,720	$15,057	$15,834	$16,457	$163,125
Total Revenues	$47,892	$49,371	$52,138	$66,878	$57,609	$59,799	$62,280	$54,733	$59,550	$64,723	$67,730	$82,641	$725,343

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
LVIS DMT													
Customers	19	19	19	19	20	19	19	19	19	20	20	20	231
Transportation Volume	119,361	139,184	161,442	223,772	194,460	190,402	188,312	183,161	134,393	113,130	98,461	111,041	1,857,118
Sales - First 100 Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Sales - 100 - 2,000 Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Sales - 2,000 - 20,000 Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Sales - Over 20,000 Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Volume	119,361	139,184	161,442	223,772	194,460	190,402	188,312	183,161	134,393	113,130	98,461	111,041	1,857,118
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$15,371	$15,371	$15,371	$15,371	$15,371	$15,371	$15,371	$15,371	$15,371	$16,180	$16,180	$20,460	$191,159
Transportation Volume	$94,285	$109,816	$127,979	$178,251	$154,878	$152,013	$150,338	$149,936	$110,109	$92,889	$79,616	$113,740	$1,513,849
Intrastate Volume	$0	$0	$1,808	$2,244	$0	$0	$513	$2,086	$0	$0	$0	$0	$6,651
Sales - First 100 Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Sales - 100 - 2,000 Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Sales - 2,000 - 20,000 Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Sales - Over 20,000 Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Revenue Rounding	$0	$0	$0	$0	$0	$0	($0)	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment	($262)	($310)	($443)	($581)	($450)	($470)	($484)	($542)	($379)	($342)	($325)	$0	($4,588)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$0	$0	$40	$48	$0	$0	$9	$41	$0	$0	$0	$0	$138
Rider H - Gas Procurement Charge	$0	$0	$216	$258	$0	$0	$59	$259	$0	$0	$0	$0	$792
Total Base Non Gas Cost Rate Revenue	$109,394	$124,876	$144,970	$195,591	$169,799	$166,914	$165,807	$167,151	$125,101	$108,727	$95,471	$134,200	$1,708,001
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$0	$0	$15,455	$18,504	$0	$0	$3,570	$15,581	$0	$0	$0	$0	$53,110
Rider A - Distribution Charge	$0	$0	$585	$701	$0	$0	$162	$707	$0	$0	$0	$0	$2,155
Rider A - Gas Adjustment Charge	$0	$0	$2,006	$2,402	$0	$0	$552	$2,407	$0	$0	$0	$0	$7,367
Rider I - OPEB Surcredit	($6,909)	($9,039)	($10,733)	($15,005)	($12,889)	($12,686)	($12,545)	($12,185)	($8,922)	($7,472)	($6,741)	($7,602)	($122,726)
Tax Cuts & Jobs Act Refund	($6,111)	($1,439)	($1,709)	($2,389)	($2,052)	($2,020)	($1,997)	($1,940)	($1,421)	($1,190)	($1,073)	($1,210)	($24,551)
Market Rate Differential	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DMT Standby Overrun Charges	$0	$0	$4,987	$5,990	$0	$0	$487	$2,108	$0	$0	$0	$0	$13,572
Overdelivery Charges	$8,139	$9,489	$14,370	$17,063	$17,756	$15,247	$16,150	$19,107	$15,570	$17,465	$24,131	$20,711	$195,197
Total Gas Cost Revenues	($4,880)	($989)	$24,961	$27,266	$2,815	$541	$6,378	$25,785	$5,227	$8,803	$16,317	$11,899	$124,124
Total Revenues	$104,515	$123,887	$169,931	$222,857	$172,615	$167,455	$172,184	$192,937	$130,328	$117,530	$111,787	$146,099	$1,832,125

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

LVIS DMT Negotiated	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
Customers	0	0	0	1	0	0	0	0	0	0	0	0	1
Transportation Volume	0	0	0	0	0	0	0	0	0	0	0	0	0
Sales - First 100 Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Sales - 100 - 2,000 Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Sales - 2,000 - 20,000 Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Sales - Over 20,000 Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Volume	0	0	0	0	0	0	0	0	0	0	0	0	0
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Transportation Volume	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Sales - First 100 Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Sales - 100 - 2,000 Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Sales - 2,000 - 20,000 Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Sales - Over 20,000 Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Revenue Rounding	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider H - Gas Procurement Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider A - Distribution Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Tax Cuts & Jobs Act Refund	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Market Rate Differential	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DMT Standby Overrun Charges	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Overdelivery Charges	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Gas Cost Revenues	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
LIS MMT													
Customers	1	1	1	1	1	1	1	1	1	1	1	1	12
All Mcf	26,611	31,565	28,387	30,458	31,989	27,624	27,900	30,530	28,364	28,241	27,362	27,381	346,412
Total Volume	26,611	31,565	28,387	30,458	31,989	27,624	27,900	30,530	28,364	28,241	27,362	27,381	346,412
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$1,029	$1,029	$1,029	$1,029	$1,029	$1,029	$1,029	$1,029	$1,029	$1,029	$1,029	$1,165	$12,484
All Mcf	$12,877	$15,274	$13,736	$14,739	$15,479	$13,367	$13,501	$14,773	$13,725	$13,666	$13,240	$16,409	$170,789
Revenue Rounding	$0	$0	$0	$0	($0)	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment	($55)	($67)	($63)	($67)	($70)	($66)	($66)	($72)	($70)	($69)	($67)	$0	($733)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$13,851	$16,237	$14,703	$15,701	$16,438	$14,331	$14,464	$15,730	$14,685	$14,625	$14,202	$17,574	$182,540
Gas Cost Revenues:													
MMT Gas Cost Charge	$9,580	$11,363	$10,219	$10,965	$11,516	$9,945	$10,044	$10,991	$10,211	$10,167	$9,850	$10,131	$124,982
Rider I - OPEB Surcredit	($786)	($566)	($509)	($546)	($574)	($496)	($501)	($548)	($509)	($507)	($491)	($491)	($6,523)
Tax Cuts & Jobs Act Refund	($523)	($454)	($408)	($438)	($460)	($397)	($401)	($439)	($408)	($406)	($393)	($394)	($5,122)
Priority Standby	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Gas Cost Revenues	$8,271	$10,343	$9,302	$9,980	$10,482	$9,052	$9,142	$10,004	$9,294	$9,254	$8,966	$9,246	$113,338
Total Revenues	$22,122	$26,580	$24,005	$25,681	$26,920	$23,382	$23,606	$25,734	$23,979	$23,879	$23,168	$26,820	$295,878

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
LIS DMT													
Customers	11	11	11	11	11	11	11	11	11	11	11	11	132
Transportation Volumes	231,697	279,392	330,184	369,516	384,847	359,248	370,839	284,471	230,344	215,853	223,326	235,798	3,515,514
Sales - First 100 Mcf	0	0	100	300	0	100	0	0	0	0	200	1,734	2,434
Sales - 100 - 2,000 Mcf	0	0	307	2,668	0	99	0	0	0	0	643	0	3,716
Sales - 2,000 - 20,000 Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Sales - Over 20,000 Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Volume	231,697	279,392	330,591	372,484	384,847	359,447	370,839	284,471	230,344	215,853	224,168	237,532	3,521,664
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$9,261	$9,261	$9,261	$9,261	$9,261	$9,261	$9,261	$9,261	$9,261	$9,261	$9,261	$10,485	$112,356
Transportation Volumes	$112,118	$135,198	$159,776	$178,809	$186,228	$173,840	$179,449	$137,655	$111,464	$104,451	$108,067	$141,314	$1,728,368
Sales - First 100 Mcf	$0	$0	$85	$256	$0	$85	$0	$0	$0	$0	$171	$1,039	$1,637
Sales - 100 - 2,000 Mcf	$0	$0	$207	$1,733	$0	$67	$0	$0	$0	$0	$434	$0	$2,441
Sales - 2,000 - 20,000 Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Sales - Over 20,000 Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Revenue Rounding	$0	$0	$0	$0	$0	($0)	$0	$0	$0	$0	($0)	($0)	($0)
Rider B - State Tax Adjustment	($304)	($376)	($493)	($623)	($541)	($538)	($544)	($452)	($377)	($346)	($375)	$0	($4,970)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$0	$0	$8	$58	$0	$3	$0	$0	$0	$0	$13	$17	$99
Rider H - Gas Procurement Charge	$0	$0	$43	$312	$0	$21	$0	$0	$0	$0	$88	$199	$663
Total Base Non Gas Cost Rate Revenue	$121,075	$144,083	$168,887	$189,805	$194,948	$182,739	$188,165	$146,465	$120,348	$113,366	$117,660	$153,055	$1,840,594
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$0	$0	$3,061	$22,344	$0	$1,257	$0	$0.00	$0	$0	$4,834	$7,145	$38,641
Rider A - Distribution Charge	$0	$0	$116	$846	$0	$57	$0	$0	$0	$0	$260	$474	$1,753
Rider A - Gas Adjustment Charge	$0	$0	$397	$2,900	$0	$194	$0	$0	$0	$0	$823	($2,040)	$2,276
Rider I - OPEB Surcredit	($6,840)	($5,012)	($5,931)	($6,682)	($6,904)	($6,448)	($6,653)	($5,103)	($4,132)	($3,872)	($4,006)	($4,230)	($65,815)
Tax Cuts & Jobs Act Refund	($4,553)	($4,018)	($4,754)	($5,356)	($5,534)	($5,169)	($5,333)	($4,091)	($3,312)	($3,104)	($3,211)	($3,391)	($51,826)
DMT Standby Overrun Charges	$0	$0	$976	$7,088	$0	$420	$0	$0	$0	$0	$662	$684	$9,830
Overdelivery Charges	$11,773	$15,098	$26,358	$27,992	$24,876	$18,711	$17,724	$23,620	$16,743	$12,651	$11,867	$11,446	$218,860
Total Gas Cost Revenues	$381	$6,068	$20,224	$49,131	$12,438	$9,022	$5,739	$14,426	$9,298	$5,675	$11,229	$10,088	$153,718
Total Revenues	$121,455	$150,150	$189,111	$238,936	$207,386	$191,761	$193,904	$160,891	$129,645	$119,041	$128,888	$163,143	$1,994,312

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

LIS DMT Negotiated	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
Customers	6	6	6	6	6	6	6	6	6	6	6	6	72
Transportation Volumes	399,254	367,067	368,005	385,865	445,679	422,015	458,348	401,746	377,141	345,927	335,701	367,413	4,674,161
Sales - First 100 Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Sales - 100 - 2,000 Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Sales - 2,000 - 20,000 Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Sales - Over 20,000 Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Volume	399,254	367,067	368,005	385,865	445,679	422,015	458,348	401,746	377,141	345,927	335,701	367,413	4,674,161
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$8,232	$8,232	$8,232	$8,232	$8,232	$8,232	$8,232	$8,232	$8,232	$8,232	$8,232	$9,320	$99,872
Transportation Volumes	$136,934	$122,814	$119,317	$124,471	$146,983	$141,883	$149,776	$135,499	$125,838	$116,903	$114,339	$128,857	$1,563,615
Sales - First 100 Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Sales - 100 - 2,000 Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Sales - 2,000 - 20,000 Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Sales - Over 20,000 Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Revenue Rounding	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment	($377)	($370)	($383)	($383)	($443)	($465)	($468)	($446)	($428)	($409)	($394)	$0	($4,566)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider H - Gas Procurement Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$144,789	$130,676	$127,166	$132,320	$154,772	$149,650	$157,540	$143,285	$133,642	$124,727	$122,177	$138,177	$1,658,921
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$0	$0	$0	$0	$0	$0	$0	$0.00	$0	$0	$0	$0	$0
Rider A - Distribution Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($10,380)	($5,954)	($5,876)	($6,074)	($7,061)	($6,579)	($7,109)	($6,216)	($5,871)	($5,465)	($5,465)	($6,017)	($78,066)
Tax Cuts & Jobs Act Refund	($2,226)	($1,202)	($831)	($856)	($1,248)	($1,382)	($5,699)	($4,982)	($4,706)	($4,380)	($4,380)	($4,823)	($36,714)
DMT Standby Overrun Charges	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Overdelivery Charges	$18,270	$24,262	$26,602	$21,670	$23,541	$23,847	$21,984	$26,711	$24,099	$25,588	$23,036	$21,967	$281,577
Total Gas Cost Revenues	$5,664	$17,107	$19,896	$14,741	$15,232	$15,886	$9,176	$15,513	$13,521	$15,742	$13,191	$11,128	$166,797
Total Revenues	$150,453	$147,783	$147,062	$147,060	$170,004	$165,536	$166,716	$158,798	$147,164	$140,469	$135,368	$149,305	$1,825,718

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2023

DMLMT Negotiated	Oct 22	Nov 22	Dec 22	Jan 23	Feb 23	Mar 23	Apr 23	May 23	Jun 23	Jul 23	Aug 23	Sep 23	Total
Customers	1	1	1	1	1	1	1	1	1	0	0	0	9
Transportation Volume	132,682	130,049	156,260	182,968	174,818	213,723	209,382	100,130	82,321	95,807	123,889	128,338	1,730,367
Total Volume	132,682	130,049	156,260	182,968	174,818	213,723	209,382	100,130	82,321	95,807	123,889	128,338	1,730,367
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$1,029	$1,029	$1,029	$1,029	$1,029	$1,029	$1,029	$1,029	$1,029	$1,029	$1,029	$1,165	$12,484
Interstate Volume	$18,469	$18,103	$21,751	$26,734	$24,335	$29,750	$29,146	$13,938	$11,459	$13,787	$17,828	$18,468	$243,767
Rider B - State Tax Adjustment	($98)	($90)	($120)	($171)	($123)	($141)	($129)	($110)	($109)	($115)	($97)	$0	($1,303)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$0	$0	$0	$36	$0	$0	$0	$0	$0	$0	$0	$0	$36
Rider H - Gas Procurement Charge	$0	$0	$0	$194	$0	$0	$0	$0	$0	$0	$0	$0	$194
Total Base Non Gas Cost Rate Revenue	$19,401	$19,042	$22,660	$27,821	$25,240	$30,638	$30,046	$14,858	$12,379	$14,700	$18,760	$19,633	$255,178
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$0	$0	$0	$13,885	$0	$0	$0	$0	$0	$0	$0	$0	$13,885
Rider A - Distribution Charge	$0	$0	$0	$526	$0	$0	$0	$0	$0	$0	$0	$0	$526
Rider A - Gas Adjustment Charge	$0	$0	$0	$1,802	$0	$0	$0	$0	$0	$0	$0	$0	$1,802
Rider I - OPEB Surcredit	$0	$0	$0	$0	$0	$0	($3,756)	($1,796)	($1,477)	($1,719)	($2,223)	($2,302)	($13,273)
Tax Cuts & Jobs Act Refund	$0	$0	$0	$0	$0	$0	($3,011)	($1,440)	($1,184)	($1,378)	($1,782)	($1,846)	($10,639)
DMT Standby Overrun Charges	$0	$0	$0	$4,427	$0	$0	$0	$0	$0	$0	$0	$0	$4,427
Overdelivery Charges	$19,559	$16,890	$23,414	$16,999	$22,011	$19,607	$22,778	$27,403	$27,858	$28,050	$18,491	$18,691	$261,751
Total Gas Cost Revenues	$19,559	$16,890	$23,414	$37,639	$22,011	$19,607	$16,011	$24,167	$25,198	$24,954	$14,487	$14,543	$258,479
Total Revenues	$38,959	$35,932	$46,075	$65,460	$47,251	$50,245	$46,057	$39,024	$37,576	$39,654	$33,247	$34,176	$513,657

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

Residential Sales Service	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
Customers	170,719	171,844	173,094	174,075	174,687	175,236	175,030	174,137	173,373	173,470	172,743	172,313	2,080,718
Total Volume	478,673	1,126,230	2,043,753	2,564,479	2,557,456	2,016,515	1,814,672	818,469	399,391	261,975	247,873	289,660	14,619,147
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$2,356,420	$2,390,949	$2,469,899	$2,526,053	$2,431,543	$2,427,737	$2,463,028	$2,435,446	$2,460,590	$2,407,856	$2,386,917	$2,425,650	$29,182,086
All Mcf	$1,426,933	$3,304,667	$6,054,639	$7,595,066	$7,570,631	$5,971,448	$5,373,786	$2,345,406	$1,184,752	$775,700	$718,226	$858,108	$43,179,360
Revenue Rounding	($548)	($146)	($905)	($1,317)	($77)	($1,351)	($1,322)	$107	($228)	$110	$888	$628	($4,161)
Rider B - State Tax Adjustment	$295	$125	$82	$4	($84)	($47)	($38)	($31)	($67)	($37)	($9)	($18)	$174
Rider E - Customer Education	($0)	$0	($0)	($0)	$0	($0)	($0)	$0	$0	$0	$0	$0	($0)
Rider F - CAP Discount Charge	$51,571	$117,428	$211,015	$264,826	$260,362	$202,672	$182,297	$82,757	$45,941	$29,906	$32,236	$43,451	$1,524,461
Rider G - Merchant Function Charge	$24,202	$64,040	$128,451	$161,573	$152,797	$111,796	$100,667	$42,616	$19,978	$13,106	$14,255	$19,108	$852,589
Rider H - Gas Procurement Charge	$55,193	$128,118	$234,834	$294,659	$293,758	$231,673	$208,477	$90,918	$45,988	$30,046	$27,677	$33,273	$1,674,615
CAP Discounts	($11)	($19)	($23)	($33)	($25)	($21)	($19)	$12	$69	$20	$6	($56)	($99)
Weather Normalization Adjustment	$88,085	$140,321	$246,788	$773,761	$962,631	$1,824,853	$544,383	$840,956	($37,391)	($7,328)	($5,588)	($2,949)	$5,368,523
Total Base Non Gas Cost Rate Revenue	$4,002,141	$6,145,483	$9,344,781	$11,614,592	$11,671,537	$10,768,760	$8,871,257	$5,838,186	$3,719,630	$3,249,378	$3,174,607	$3,377,196	$81,777,549
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$1,953,515	$4,865,308	$9,449,716	$11,865,575	$11,356,903	$8,475,925	$7,631,847	$3,250,386	$1,552,069	$1,018,037	$1,007,853	$1,272,548	$63,699,683
Rider A - Distribution Charge	$130,851	$353,370	$737,100	$925,174	$935,462	$750,522	$675,157	$291,674	$143,712	$94,161	$84,819	$99,146	$5,221,147
Rider A - Gas Adjustment Charge	($586,462)	($1,284,512)	($2,277,383)	($2,850,270)	($2,835,920)	($2,237,568)	($2,014,083)	($877,927)	($440,484)	($289,047)	($217,542)	($208,248)	($16,119,447)
Rider F - Reconcilation	($16,710)	($39,500)	($72,525)	($90,831)	($60,455)	($17,377)	($15,890)	($7,016)	($3,718)	($2,447)	($2,243)	($2,699)	($331,414)
Rider I - OPEB Surcredit	($100,591)	($233,753)	($428,689)	($537,911)	($536,063)	($423,119)	($380,658)	($166,069)	($83,964)	($54,905)	($50,611)	($60,769)	($3,057,103)
Tax Cuts & Jobs Act Refund	($31,725)	($21,066)	($40,394)	($51,272)	($51,560)	($40,524)	($36,470)	($15,967)	($8,351)	($5,441)	($4,793)	($5,895)	($313,457)
Total Gas Cost Revenues	$1,348,877	$3,639,846	$7,367,825	$9,260,463	$8,808,367	$6,507,858	$5,859,903	$2,475,081	$1,159,264	$760,357	$817,484	$1,094,083	$49,099,409
Total Revenues	$5,351,018	$9,785,330	$16,712,606	$20,875,055	$20,479,904	$17,276,618	$14,731,161	$8,313,267	$4,878,894	$4,009,736	$3,992,091	$4,471,278	$130,876,958

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

Residential CAP/LIRA	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
Customers	8,003	7,479	7,072	6,930	6,559	5,975	6,321	6,236	6,164	5,632	5,650	5,687	77,707
Total Volume	23,998	52,040	92,262	109,753	105,348	75,048	70,043	33,233	15,563	7,786	7,908	9,929	602,911
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$110,558	$103,542	$101,060	$99,995	$91,391	$82,545	$85,161	$86,813	$87,309	$77,948	$77,972	$80,375	$1,084,668
All Mcf	$71,542	$153,311	$273,366	$325,120	$312,067	$222,365	$207,306	$95,389	$46,183	$23,210	$22,595	$29,548	$1,782,000
Revenue Rounding	($15)	($20)	($50)	($52)	($25)	($51)	($53)	$0	($12)	$3	$27	$17	($231)
Rider B - State Tax Adjustment	$10	$11	$2	$2	$2	$3	($1)	$3	($3)	$7	($0)	($0)	$36
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
	$1,740	$3,991	$7,645	$9,110	$8,421	$5,641	$5,287	$2,352	$1,088	$518	$569	$786	$47,149
	($534)	($1,091)	($1,853)	($2,196)	($2,113)	($1,507)	($1,397)	($651)	($309)	($164)	($121)	($133)	($12,069)
Rider G - Merchant Function Charge	$1,206	$2,900	$5,792	$6,914	$6,309	$4,134	$3,890	$1,701	$780	$354	$448	$653	$35,080
Rider H - Gas Procurement Charge	$2,766	$5,935	$10,602	$12,612	$12,105	$8,624	$8,047	$3,691	$1,793	$896	$870	$1,145	$69,084
CAP Discounts	($57,582)	($100,110)	($170,113)	($195,354)	($182,946)	($123,913)	($141,879)	($8,405)	$140,244	$162,719	$177,628	$159,118	($340,592)
Weather Normalization Adjustment	$5,633	$6,353	$10,234	$36,688	$36,745	$70,222	$21,016	$36,189	($1,257)	($486)	($207)	$64	$221,194
Total Base Non Gas Cost Rate Revenue	$134,118	$171,921	$230,894	$285,924	$275,646	$263,929	$183,485	$215,381	$275,037	$264,652	$279,332	$270,919	$2,851,240
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$97,694	$223,262	$426,450	$507,875	$469,605	$314,802	$294,622	$131,517	$60,539	$29,299	$31,728	$43,788	$2,631,181
Rider A - Distribution Charge	$6,556	$16,160	$33,274	$39,607	$38,505	$27,954	$26,058	$11,867	$5,599	$2,823	$2,668	$3,421	$214,491
Rider A - Gas Adjustment Charge	($29,468)	($60,439)	($102,906)	($122,036)	($117,349)	($83,699)	($77,664)	($36,192)	($17,143)	($9,081)	($6,885)	($7,358)	($670,221)
Rider I - OPEB Surcredit	($5,037)	($10,843)	($19,351)	($23,027)	($22,084)	($15,742)	($14,695)	($6,737)	($3,272)	($1,634)	($1,591)	($2,092)	($126,106)
Tax Cuts & Jobs Act Refund	($1,666)	($910)	($1,821)	($2,177)	($2,084)	($1,481)	($1,420)	($614)	($326)	($114)	($152)	($200)	($12,965)
Total Gas Cost Revenues	$68,078	$167,230	$335,647	$400,242	$366,592	$241,834	$226,900	$99,841	$45,396	$21,294	$25,767	$37,559	$2,036,380
Total Revenues	$202,196	$339,151	$566,541	$686,166	$642,239	$505,763	$410,386	$315,222	$320,434	$285,946	$305,099	$308,478	$4,887,620

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

Residential SATC	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
Customers	16,320	16,236	16,166	16,208	16,197	16,245	16,338	16,489	16,650	16,780	16,964	17,049	197,639
Total Volume	48,191	108,759	196,001	245,200	243,103	191,137	173,790	80,659	39,171	26,153	25,285	28,630	1,406,077
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$225,249	$225,539	$229,861	$234,367	$225,108	$225,144	$229,456	$230,156	$236,172	$233,286	$234,458	$239,052	$2,767,848
All Mcf	$143,312	$318,923	$580,601	$726,155	$719,627	$565,987	$514,455	$230,903	$116,246	$77,266	$73,091	$84,841	$4,151,407
Revenue Rounding	($31)	($46)	($99)	($128)	$30	($110)	($113)	$66	($13)	$0	$27	$23	($394)
Rider B - State Tax Adjustment	$6	$2	$2	$0	($3)	($0)	($1)	($1)	($1)	($1)	($1)	$1	$2
Rider G - Merchant Function Charge	$0	$0	$0	$1	$1	$0	($2)	$0	$0	$0	$0	$0	$0
Rider H - Gas Procurement Charge	$0	$0	$0	$1	$1	$1	($3)	$0	$0	$0	$0	$0	$0
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider F - CAP Discount Charge	$5,188	$11,338	$20,233	$25,321	$24,752	$19,204	$17,452	$8,142	$4,496	$2,980	$3,255	$4,295	$146,655
CAP Discounts	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	($5)	($5)
DSIC - Distribution System Improvement Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Weather Normalization Adjustment	$8,542	$13,155	$23,600	$74,063	$91,309	$174,221	$52,194	$82,157	($3,114)	($802)	($200)	($315)	$514,811
Total Base Non Gas Cost Rate Revenue	$382,265	$568,912	$854,198	$1,059,781	$1,060,826	$984,446	$813,438	$551,424	$353,785	$312,729	$310,631	$327,887	$7,580,321
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$757	$1,857	$3,739	$4,672	$4,573	$3,676	$3,203	$1,441	$728	$471	$490	$633	$26,240
Rider A - Distribution Charge	$13,169	$34,066	$70,669	$88,454	$88,915	$71,136	$64,637	$28,712	$14,101	$9,388	$8,642	$9,801	$501,693
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider F - Reconcilation	($1,681)	($3,702)	($6,943)	($8,680)	($5,749)	($1,668)	($1,536)	($739)	($360)	($242)	($253)	($266)	($31,819)
Rider I - OPEB Surcredit	($10,120)	($22,559)	($41,115)	($51,439)	($50,957)	($40,086)	($36,445)	($16,345)	($8,226)	($5,471)	($5,152)	($6,001)	($293,916)
Tax Cuts & Jobs Act Refund	($3,226)	($2,070)	($3,880)	($4,910)	($4,917)	($3,823)	($3,485)	($1,567)	($800)	($533)	($509)	($557)	($30,278)
Total Gas Cost Revenues	($1,101)	$7,592	$22,470	$28,097	$31,865	$29,234	$26,374	$11,503	$5,443	$3,612	$3,218	$3,610	$171,919
Total Revenues	$381,164	$576,504	$876,669	$1,087,878	$1,092,691	$1,013,681	$839,812	$562,927	$359,227	$316,341	$313,849	$331,497	$7,752,240

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
Residential MMT													
Customers	457	460	462	461	463	461	466	464	465	507	505	505	5,675
Total Volume	2,510	7,146	14,178	17,134	19,035	15,541	13,123	5,993	1,920	1,228	1,043	1,468	100,318
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$6,219	$6,302	$6,509	$6,686	$6,332	$6,421	$6,499	$6,584	$6,552	$6,920	$6,962	$7,040	$79,026
All Volume	$7,177	$21,157	$41,950	$50,694	$56,326	$45,921	$38,860	$17,741	$5,684	$3,635	$3,089	$4,345	$296,579
Revenue Rounding	($187)	($9)	($33)	($57)	$0	$0	$0	($5)	($0)	($1)	($0)	$0	($291)
Rider B - State Tax Adjustment	$1	$0	$0	$1	($1)	($1)	$0	$0	$0	$0	$0	$0	$1
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider F - CAP Discount Charge	$271	$757	$1,460	$1,763	$1,950	$1,572	$1,324	$619	$222	$140	$135	$219	$10,432
Weather Normalization Adjustment	$479	$1,290	$1,199	$6,840	$5,762	$13,257	$5,263	$5,976	($69)	($52)	($107)	($3)	$39,836
Total Base Non Gas Cost Rate Revenue	$13,961	$29,497	$51,086	$65,929	$70,369	$67,170	$51,946	$30,915	$12,390	$10,642	$10,078	$11,602	$425,582
Gas Cost Revenues:													
MMT Gas Cost Charge	$1,011	$2,649	$5,261	$6,366	$7,043	$5,748	$4,856	$2,337	$934	$579	$496	$689	$37,969
Rider F - Reconcilation	($87)	($251)	($499)	($604)	($523)	($151)	($122)	($54)	($18)	($11)	($10)	($14)	($2,344)
Rider I - OPEB Surcredit	($288)	($756)	($1,499)	($1,811)	($2,016)	($1,648)	($1,388)	($634)	($203)	($130)	($110)	($155)	($10,637)
Tax Cuts & Jobs Act Refund	($134)	($106)	($211)	($250)	($295)	($251)	($198)	($89)	($29)	($18)	($16)	($22)	($1,620)
Priority Standby	$528	$1,388	$2,250	$2,986	$3,633	$3,170	$2,800	$1,324	$614	$538	$328	$469	$20,027
Total Gas Cost Revenues	$1,030	$2,923	$5,301	$6,686	$7,843	$6,868	$5,948	$2,884	$1,298	$957	$689	$967	$43,394
Total Revenues	$14,991	$32,420	$56,387	$72,615	$78,212	$74,038	$57,894	$33,799	$13,687	$11,599	$10,767	$12,569	$468,976

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
SCPA < 250 Sales													
Customers	8,148	8,251	8,310	8,377	8,413	8,552	8,544	8,498	8,371	8,333	8,323	8,302	100,420
Total Volume	18,555	54,753	109,449	149,668	157,520	123,466	105,358	38,918	10,226	8,242	7,442	10,819	794,413
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$209,784	$221,884	$226,031	$238,073	$224,545	$229,440	$233,534	$240,384	$223,360	$229,174	$210,249	$234,902	$2,721,359
All Mcf	$42,825	$125,930	$251,699	$344,177	$362,221	$283,923	$242,282	$89,534	$23,532	$18,969	$17,114	$24,882	$1,827,087
Revenue Rounding	($18)	($35)	($58)	($70)	($72)	($71)	($69)	($14)	$7	$25	$31	($9)	($353)
Rider B - State Tax Adjustment	$9	$3	($4)	($1)	$2	($1)	($2)	$6	($2)	$4	$0	$0	$14
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$186	$605	$1,302	$1,782	$1,774	$1,284	$1,098	$390	$94	$82	$83	$140	$8,821
Rider H - Gas Procurement Charge	$2,140	$6,291	$12,573	$17,196	$18,099	$14,185	$12,104	$4,474	$1,171	$945	$853	$1,241	$91,272
Weather Normalization Adjustment	$2,879	$5,934	$10,666	$37,366	$47,128	$92,072	$24,612	$36,456	($7,425)	($277)	($333)	($27)	$249,049
Total Base Non Gas Cost Rate Revenue	$257,805	$360,611	$502,209	$638,523	$653,697	$620,832	$513,559	$371,229	$240,737	$248,922	$227,997	$261,129	$4,897,249
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$75,717	$239,544	$506,310	$692,561	$700,073	$518,998	$443,216	$159,310	$37,804	$31,670	$31,137	$47,603	$3,483,944
Rider A - Distribution Charge	$5,073	$17,401	$39,512	$54,009	$57,620	$45,952	$39,199	$14,367	$3,610	$2,980	$2,590	$3,700	$286,013
Rider A - Gas Adjustment Charge	($22,869)	($62,881)	($121,734)	($166,212)	($175,193)	($137,138)	($116,941)	($43,682)	($11,242)	($9,281)	($6,480)	($7,770)	($881,422)
Rider I - OPEB Surcredit	($1,933)	($5,689)	($11,349)	($15,542)	($16,367)	($12,829)	($10,947)	($4,052)	($1,059)	($846)	($770)	($1,119)	($82,500)
Tax Cuts & Jobs Act Refund	($1,251)	($1,137)	($2,462)	($3,323)	($3,481)	($2,740)	($2,343)	($809)	($239)	($142)	($162)	($238)	($18,328)
DMT Standby Overrun Charge	$2	($2)	$0	$0	$32	$58	($89)	$0	($0)	$0	$1	$3	$4
Total Gas Cost Revenues	$54,740	$187,236	$410,277	$561,494	$562,685	$412,301	$352,094	$125,135	$28,874	$24,380	$26,316	$42,180	$2,787,711
Total Revenues	$312,545	$547,848	$912,486	$1,200,016	$1,216,382	$1,033,133	$865,654	$496,364	$269,611	$273,302	$254,313	$303,309	$7,684,961

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

SCPA < 250 SATC	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
Customers	851	845	841	839	837	840	826	811	795	776	774	775	9,809
Total Volume	2,065	5,755	11,477	15,618	16,520	12,864	10,891	4,139	1,383	786	892	1,145	83,534
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$21,890	$22,926	$22,764	$23,854	$22,260	$22,364	$22,479	$22,908	$21,421	$20,735	$19,902	$21,377	$264,880
All Mcf	$4,775	$13,235	$26,403	$35,914	$37,987	$29,583	$25,046	$9,519	$3,180	$1,808	$2,052	$2,634	$192,135
Revenue Rounding	($2)	($2)	($6)	($7)	($7)	($7)	($8)	($4)	($1)	($0)	$0	($1)	($47)
Rider B - State Tax Adjustment	$1	$0	$0	$0	($0)	$0	$0	$0	$0	$0	($0)	$0	$1
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Weather Normalization Adjustment	$348	$594	$1,152	$3,844	$4,925	$9,541	$2,492	$3,741	($646)	($79)	($18)	($2)	$25,892
Total Base Non Gas Cost Rate Revenue	$27,012	$36,753	$50,313	$63,604	$65,165	$61,480	$50,009	$36,164	$23,954	$22,463	$21,936	$24,007	$482,861
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$32	$99	$216	$293	$311	$243	$207	$80	$25	$15	$18	$25	$1,564
Rider A - Distribution Charge	$565	$1,818	$4,151	$5,639	$6,041	$4,788	$4,053	$1,526	$492	$282	$311	$392	$30,058
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($216)	($598)	($1,192)	($1,622)	($1,716)	($1,337)	($1,132)	($430)	($143)	($81)	($92)	($118)	($8,677)
Tax Cuts & Jobs Act Refund	($137)	($122)	($245)	($341)	($367)	($285)	($241)	($91)	($30)	($17)	($20)	($25)	($1,924)
Total Gas Cost Revenues	$243	$1,196	$2,931	$3,969	$4,268	$3,409	$2,887	$1,085	$344	$199	$217	$274	$21,021
Total Revenues	$27,255	$37,950	$53,244	$67,573	$69,434	$64,889	$52,896	$37,249	$24,298	$22,662	$22,153	$24,281	$503,882

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

SCPA < 250 MMT	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
Customers	1,095	1,094	1,115	1,121	1,121	1,142	1,145	1,147	1,154	1,168	1,162	1,159	13,620
Total Volume	3,341	8,860	18,209	25,417	27,268	20,959	17,805	7,079	2,164	1,361	1,711	1,763	135,935
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$27,870	$29,435	$30,291	$31,697	$29,611	$30,765	$31,006	$32,334	$31,253	$32,069	$28,886	$32,635	$367,853
All Mcf	$7,680	$20,372	$41,870	$58,440	$62,699	$48,196	$40,942	$16,278	$4,977	$3,130	$3,934	$4,053	$312,569
Revenue Rounding	($2)	($1)	($1)	($1)	($0)	($0)	($1)	($2)	($2)	($0)	$0	($1)	($11)
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	($0)	$0	$0	$0	($0)	$0	$0	$1
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Weather Normalization Adjustment	$492	$924	$1,746	$6,176	$7,817	$14,978	$4,476	$6,309	($1,057)	($54)	($49)	($33)	$41,725
Total Base Non Gas Cost Rate Revenue	$36,040	$50,730	$73,906	$96,313	$100,127	$93,937	$76,424	$54,918	$35,171	$35,145	$32,771	$36,654	$722,137
Gas Cost Revenues:													
MMT Gas Cost Charge	$1,237	$3,279	$6,738	$9,405	$10,090	$7,755	$6,588	$2,812	$1,102	$652	$808	$832	$51,299
Rider I - OPEB Surcredit	($300)	($810)	($1,665)	($2,324)	($2,493)	($1,916)	($1,628)	($647)	($198)	($125)	($157)	($161)	($12,425)
Tax Cuts & Jobs Act Refund	($218)	($179)	($377)	($527)	($565)	($443)	($371)	($147)	($45)	($29)	($35)	($36)	($2,972)
Priority Standby	$160	$317	$608	$682	$916	$818	$705	$358	$165	$151	$122	$147	$5,149
Total Gas Cost Revenues	$879	$2,606	$5,304	$7,236	$7,948	$6,214	$5,295	$2,376	$1,025	$649	$738	$781	$41,052
Total Revenues	$36,918	$53,337	$79,210	$103,549	$108,075	$100,151	$81,719	$57,294	$36,196	$35,794	$33,510	$37,436	$763,189

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
SCPA > 250 Sales													
Customers	2,765	2,778	2,787	2,797	2,810	2,726	2,730	2,728	2,703	2,703	2,705	2,707	32,937
Total Volume	35,857	83,199	152,580	204,932	205,745	159,685	142,307	62,355	29,073	20,701	22,469	25,937	1,144,838
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$98,049	$102,250	$104,598	$108,223	$103,010	$100,005	$101,566	$104,742	$99,031	$102,071	$94,689	$104,861	$1,223,095
All Mcf	$73,862	$171,185	$313,468	$421,302	$422,890	$328,233	$292,554	$128,142	$59,768	$42,924	$46,181	$53,343	$2,353,851
Revenue Rounding	($1)	($6)	$0	($1)	($2)	$1	$0	$3	($3)	$0	$6	($0)	($3)
Rider B - State Tax Adjustment	$17	$13	($13)	$6	($2)	$0	$3	($2)	$1	$28	($1)	$2	$52
Rider E - Customer Education	$0	($0)	$0	$0	$0	$0	($0)	$0	$0	($0)	$0	$0	($0)
Rider G - Merchant Function Charge	$355	$904	$1,819	$2,438	$2,320	$1,658	$1,479	$628	$265	$183	$242	$321	$12,612
Rider H - Gas Procurement Charge	$4,124	$9,564	$17,527	$23,550	$23,639	$18,348	$16,353	$7,164	$3,340	$2,388	$2,581	$2,981	$131,559
Weather Normalization Adjustment	$3,865	$6,823	$11,872	$41,969	$50,541	$97,119	$27,720	$40,123	($4,953)	($351)	($235)	($86)	$274,404
Total Base Non Gas Cost Rate Revenue	$180,271	$290,732	$449,269	$597,486	$602,396	$545,365	$439,676	$280,797	$157,449	$147,243	$143,463	$161,422	$3,995,569
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$146,373	$361,450	$706,974	$947,640	$915,573	$670,523	$597,914	$256,117	$111,303	$76,922	$92,477	$113,273	$4,996,540
Rider A - Distribution Charge	$9,772	$26,170	$55,029	$73,996	$75,243	$59,444	$52,972	$22,964	$10,407	$7,520	$7,895	$8,888	$410,300
Rider A - Gas Adjustment Charge	($43,516)	($96,358)	($168,524)	($228,209)	($228,519)	($177,467)	($158,357)	($69,119)	($32,370)	($25,229)	($20,819)	($19,010)	($1,267,497)
Rider I - OPEB Surcredit	($4,131)	($9,322)	($17,112)	($22,984)	($23,072)	($17,905)	($15,962)	($6,991)	($3,259)	($2,313)	($2,519)	($2,907)	($128,476)
Tax Cuts & Jobs Act Refund	($1,633)	($975)	($1,932)	($2,514)	($2,551)	($1,982)	($1,754)	($781)	($357)	($176)	($280)	($315)	($15,248)
DMT Standby Overrun Charge	$0	$0	($0)	$0	$143	$82	($225)	$34	($34)	$0	$41	$80	$120
Total Gas Cost Revenues	$106,866	$280,965	$574,435	$767,929	$736,817	$532,696	$474,588	$202,224	$85,689	$56,725	$76,796	$100,009	$3,995,740
Total Revenues	$287,137	$571,697	$1,023,705	$1,365,415	$1,339,213	$1,078,061	$914,264	$483,021	$243,138	$203,968	$220,259	$261,431	$7,991,309

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

SCPA > 250 SATC	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
Customers	370	368	361	361	361	343	337	339	333	328	324	328	4,152
Total Volume	5,614	11,769	19,918	26,203	25,752	20,646	18,444	8,606	4,554	3,463	3,576	3,777	152,321
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$13,118	$13,602	$13,520	$14,204	$13,037	$12,500	$12,619	$12,637	$12,434	$12,324	$11,523	$12,363	$153,881
All Mcf	$11,539	$24,197	$40,941	$53,861	$52,932	$42,437	$37,911	$17,690	$9,361	$7,118	$7,351	$7,764	$313,102
Revenue Rounding	($0)	($1)	$0	($0)	($0)	$0	($0)	($0)	($0)	($0)	($0)	($0)	($2)
Rider B - State Tax Adjustment	$1	($0)	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Weather Normalization Adjustment	$553	$802	$1,501	$5,200	$6,308	$12,705	$3,201	$4,919	($507)	($42)	($28)	($2)	$34,611
Total Base Non Gas Cost Rate Revenue	$25,211	$38,599	$55,963	$73,264	$72,278	$67,643	$53,732	$35,246	$21,287	$19,400	$18,846	$20,125	$501,593
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$89	$201	$368	$485	$476	$382	$341	$159	$84	$64	$71	$83	$2,805
Rider A - Distribution Charge	$1,530	$3,684	$7,197	$9,459	$9,419	$7,687	$6,861	$3,170	$1,633	$1,246	$1,260	$1,294	$54,438
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($649)	($1,319)	($2,233)	($2,939)	($2,888)	($2,315)	($2,068)	($965)	($511)	($388)	($401)	($423)	($17,097)
Tax Cuts & Jobs Act Refund	($275)	($136)	($247)	($325)	($319)	($255)	($229)	($107)	($57)	($43)	($44)	($47)	($2,083)
Total Gas Cost Revenues	$695	$2,431	$5,085	$6,681	$6,688	$5,499	$4,905	$2,257	$1,151	$878	$886	$907	$38,063
Total Revenues	$25,906	$41,031	$61,048	$79,945	$78,966	$73,142	$58,637	$37,504	$22,438	$20,278	$19,732	$21,032	$539,656

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
SCPA > 250 MMT													
Customers	1,220	1,231	1,238	1,248	1,239	1,245	1,243	1,242	1,251	1,258	1,257	1,253	14,923
Total Volume	20,417	44,788	84,270	110,330	112,722	91,510	77,921	37,474	17,841	13,477	10,812	14,778	636,341
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$43,326	$45,119	$46,408	$48,284	$45,492	$45,805	$45,810	$47,730	$46,113	$47,439	$43,639	$47,868	$553,035
All Mcf	$41,959	$92,009	$173,273	$226,784	$231,699	$188,075	$160,171	$77,028	$36,673	$27,703	$22,224	$30,377	$1,307,975
Revenue Rounding	($1)	($0)	($0)	($0)	($0)	($1)	($0)	($0)	($1)	($1)	($0)	($1)	($5)
Rider B - State Tax Adjustment	($0)	($1)	$2	$0	$0	($1)	$0	$0	$0	$0	$0	$0	($0)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Weather Normalization Adjustment	$1,881	$3,677	$5,863	$24,111	$24,827	$52,894	$16,833	$22,146	($1,882)	($47)	($156)	$0	$150,147
Total Base Non Gas Cost Rate Revenue	$87,166	$140,804	$225,546	$299,179	$302,018	$286,773	$222,814	$146,904	$80,904	$75,094	$65,706	$78,244	$2,011,151
Gas Cost Revenues:													
MMT Gas Cost Charge	$7,555	$16,565	$31,182	$40,823	$41,708	$33,858	$28,832	$14,817	$8,605	$6,357	$5,222	$6,946	$242,469
Rider I - OPEB Surcredit	($2,377)	($5,360)	($10,066)	($13,176)	($13,461)	($10,927)	($9,305)	($4,475)	($2,131)	($1,609)	($1,291)	($1,765)	($75,942)
Tax Cuts & Jobs Act Refund	($1,021)	($565)	($1,015)	($1,360)	($1,391)	($1,137)	($959)	($462)	($220)	($166)	($133)	($182)	($8,610)
Priority Standby	$2,734	$4,439	$7,073	$8,491	$9,964	$10,156	$8,884	$5,088	$3,020	$2,017	$2,013	$2,029	$65,908
Total Gas Cost Revenues	$6,891	$15,079	$27,175	$34,778	$36,820	$31,949	$27,452	$14,968	$9,275	$6,598	$5,811	$7,028	$223,824
Total Revenues	$94,057	$155,883	$252,721	$333,956	$338,838	$318,722	$250,266	$161,871	$90,179	$81,692	$71,517	$85,273	$2,234,975

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
LCPA Sales													
Customers	487	475	477	485	489	460	455	451	460	442	439	444	5,561
Total Volume	26,776	54,519	94,886	122,577	128,687	98,771	94,797	50,578	28,239	21,120	18,221	19,928	759,100
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$71,613	$71,461	$73,639	$77,311	$72,198	$69,739	$67,971	$71,094	$67,487	$67,376	$63,300	$68,667	$841,857
All Mcf	$44,497	$91,025	$157,719	$203,495	$213,942	$164,049	$157,436	$84,066	$46,940	$35,106	$30,287	$33,125	$1,261,687
Bypass Service	$0	$0	$0	$0	$0	$0	$0	$0	$1,451	$0	$207	$1,854	$3,511
Revenue Rounding	$0	$0	$2	$1	$2	$1	$1	$0	($0)	($0)	$0	$0	$6
Rider B - State Tax Adjustment	($1)	$8	$0	($31)	$6	($20)	($18)	($2)	$0	$0	$0	$0	($58)
Rider E - Customer Education	$0	$0	$0	$0	($0)	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$268	$587	$1,127	$1,465	$1,467	$1,034	$993	$514	$265	$197	$191	$245	$8,352
Rider H - Gas Procurement Charge	$3,076	$6,291	$10,902	$14,072	$14,788	$11,341	$10,885	$5,811	$3,245	$2,427	$2,093	$2,290	$87,222
Total Base Non Gas Cost Rate Revenue	$119,453	$169,372	$243,388	$296,313	$302,403	$246,143	$237,268	$161,484	$119,388	$105,105	$96,079	$106,180	$2,202,577
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$110,411	$235,924	$438,311	$569,277	$576,897	$417,574	$400,760	$209,120	$110,411	$82,122	$74,226	$86,968	$3,312,001
Rider A - Distribution Charge	$7,317	$16,849	$34,136	$44,123	$46,944	$36,701	$35,082	$18,678	$10,170	$7,604	$6,434	$6,840	$270,879
Rider I - OPEB Surcredit	($2,607)	($5,742)	($9,949)	($12,836)	($13,491)	($10,348)	($9,920)	($5,303)	($2,961)	($2,214)	($1,910)	($2,089)	($79,371)
Tax Cuts & Jobs Act Refund	($1,195)	($550)	($983)	($1,345)	($1,314)	($1,064)	($1,073)	($526)	($293)	($219)	($189)	($206)	($8,957)
DMT Standby Overrun Charge	$0	$397	$748	$0	$0	$108	($108)	$0	$0	$0	$0	$269	$1,414
Total Gas Cost Revenues	$82,560	$183,259	$356,735	$465,482	$465,587	$334,812	$320,829	$165,820	$85,944	$63,822	$61,043	$77,045	$2,662,939
Total Revenues	$202,013	$352,632	$600,123	$761,796	$767,990	$580,956	$558,097	$327,304	$205,332	$168,927	$157,122	$183,225	$4,865,516

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

LCPA SATC	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
Customers	47	52	53	54	51	49	49	49	51	53	52	52	612
Total Volume	2,987	6,969	10,309	12,584	12,616	9,823	9,142	4,062	3,327	2,725	2,454	3,020	80,017
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$6,741	$7,825	$8,187	$8,341	$7,647	$7,518	$7,248	$7,647	$7,399	$8,278	$7,416	$7,926	$92,173
All Mcf	$4,964	$11,584	$17,136	$20,917	$20,961	$16,328	$15,175	$6,751	$5,530	$4,530	$4,079	$5,020	$132,975
Revenue Rounding	($0)	$0	$0	$0	$0	$0	$0	$0	$0	$0	($0)	($0)	$0
Rider B - State Tax Adjustment	$0	$0	$0	$0	($0)	$0	($1)	$0	$0	$0	$0	$0	($1)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$11,705	$19,409	$25,322	$29,258	$28,608	$23,846	$22,423	$14,399	$12,929	$12,808	$11,494	$12,946	$225,148
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$48	$118	$190	$233	$234	$182	$169	$75	$62	$50	$49	$65	$1,476
Rider A - Distribution Charge	$816	$2,144	$3,714	$4,560	$4,597	$3,656	$3,392	$1,498	$1,195	$981	$863	$1,038	$28,454
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($289)	($730)	($1,081)	($1,320)	($1,322)	($1,030)	($957)	($426)	($349)	($286)	($257)	($317)	($8,364)
Tax Cuts & Jobs Act Refund	($139)	($73)	($107)	($129)	($135)	($102)	($102)	($42)	($34)	($28)	($25)	($31)	($948)
Total Gas Cost Revenues	$435	$1,458	$2,717	$3,345	$3,373	$2,706	$2,503	$1,105	$873	$717	$630	$755	$20,618
Total Revenues	$12,140	$20,867	$28,039	$32,603	$31,982	$26,552	$24,926	$15,504	$13,802	$13,526	$12,124	$13,701	$245,766

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
LCPA MMT													
Customers	1,025	1,028	1,030	1,031	1,039	1,009	1,011	1,011	1,012	1,012	1,011	1,010	12,225
Total Volume	144,478	295,940	490,884	581,468	696,408	572,174	489,657	333,828	164,124	118,031	110,492	123,840	4,121,322
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$153,071	$155,773	$156,421	$158,440	$155,777	$152,341	$152,335	$153,185	$154,648	$151,819	$149,687	$152,661	$1,846,157
All Mcf	$240,158	$491,913	$815,993	$966,516	$1,157,491	$951,063	$813,908	$554,889	$272,807	$195,941	$183,659	$205,846	$6,850,184
Revenue Rounding	($0)	($0)	($0)	($0)	($0)	($0)	($0)	($0)	($0)	$0	($0)	($1)	($2)
Rider B - State Tax Adjustment	$0	$0	$1	$0	($1)	($0)	$0	$0	$0	($4)	$0	$0	($5)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$393,229	$647,686	$972,415	$1,124,955	$1,313,266	$1,103,403	$966,243	$708,073	$427,454	$347,756	$333,346	$358,507	$8,696,334
Gas Cost Revenues:													
MMT Gas Cost Charge	$53,457	$109,498	$181,629	$215,143	$257,669	$211,704	$181,173	$125,301	$78,407	$55,326	$51,890	$58,246	$1,579,445
Rider I - OPEB Surcredit	($16,522)	($34,964)	($58,004)	($68,706)	($82,286)	($67,608)	($57,858)	($39,445)	($19,393)	($13,942)	($13,056)	($14,633)	($486,417)
Tax Cuts & Jobs Act Refund	($7,529)	($2,526)	($4,089)	($4,861)	($5,840)	($4,784)	($4,094)	($2,791)	($1,372)	($1,039)	($924)	($1,035)	($40,883)
Priority Standby	$29,891	$56,972	$90,853	$102,749	$128,764	$127,459	$118,210	$72,449	$41,984	$22,108	$23,980	$26,424	$841,843
Total Gas Cost Revenues	$59,298	$128,980	$210,389	$244,325	$298,307	$266,771	$237,432	$155,513	$99,626	$62,453	$61,891	$69,002	$1,893,988
Total Revenues	$452,527	$776,666	$1,182,805	$1,369,281	$1,611,572	$1,370,174	$1,203,675	$863,587	$527,080	$410,209	$395,237	$427,509	$10,590,322

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

LCPA DMT	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
Customers	15	15	15	15	15	15	15	15	15	15	14	14	178
Transportation Volumes	55,335	73,813	91,892	93,314	107,176	96,632	90,862	76,579	54,860	54,926	43,293	51,328	890,010
Sales - First 300 Mcf	0	7,238	4,097	(11,334)	0	0	0	0	0	1,747	(1,747)	272	272
Total Volume	55,335	81,050	95,989	81,980	107,176	96,632	90,862	76,579	54,860	56,673	41,546	51,600	890,282
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$2,265	$2,265	$2,265	$2,265	$2,265	$2,265	$2,265	$2,265	$2,265	$2,567	$1,812	$2,114	$26,878
Transportation Volumes	$91,978	$122,691	$152,743	$155,107	$178,147	$160,622	$151,031	$127,289	$91,188	$91,298	$71,962	$85,318	$1,479,375
Sales - Mcf	$0	$12,030	$6,810	($18,840)	$0	$0	$0	$0	$0	$2,904	($2,904)	$452	$452
Revenue Rounding	$0	$0	($0)	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$0	$72	$63	($135)	$0	$0	$0	$0	$0	$16	($16)	$3	$3
Rider H - Gas Procurement Charge	$0	$832	$471	($1,302)	$0	$0	$0	$0	$0	$201	($201)	$31	$31
Total Base Non Gas Cost Rate Revenue	$94,243	$137,891	$162,351	$137,095	$180,412	$162,887	$153,296	$129,554	$93,453	$96,986	$70,653	$87,918	$1,506,740
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$0	$29,820	$22,614	($52,434)	$0	$0	$0	$0	$0	$6,780	($6,780)	$1,187	$1,187
Rider A - Distribution Charge	$0	$1,977	$2,114	($4,091)	$0	$0	$0	$0	$0	$629	($629)	$93	$93
Rider A - Gas Adjustment Charge	$0	($8,512)	($4,084)	$12,596	$0	$0	$0	$0	$0	($1,942)	$1,942	($200)	($200)
Rider I - OPEB Surcredit	($6,295)	($9,481)	($11,288)	($9,838)	($12,664)	($11,418)	($10,736)	($9,049)	($6,482)	($6,673)	($4,932)	($6,093)	($104,949)
Tax Cuts & Jobs Act Refund	($3,261)	($692)	($811)	($663)	($896)	($808)	($760)	($640)	($459)	($477)	($344)	($432)	($10,242)
DMT Standby Overrun Charges	$0	$3,539	$12,186	($15,725)	$0	$0	$0	$0	$0	$839	($839)	$154	$154
Market Rate Differential	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Overdelivery Charges	$3,858	$4,892	$4,665	$5,590	$9,064	$6,881	$6,401	$6,290	$6,359	$5,536	$3,175	$3,737	$66,450
Total Gas Cost Revenues	($5,698)	$21,544	$25,397	($64,564)	($4,496)	($5,345)	($5,095)	($3,398)	($582)	$4,692	($8,407)	($1,554)	($47,507)
Total Revenues	$88,545	$159,434	$187,748	$72,531	$175,916	$157,542	$148,201	$126,155	$92,872	$101,678	$62,246	$86,364	$1,459,233

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
PA NGV													
Customers	7	7	7	7	7	7	7	7	7	7	7	7	84
Total Volume	16,839	1,601	9,122	11,902	6,349	8,871	8,908	9,134	8,537	9,151	7,328	11,812	109,554
Base Non Gas Cost Rate Revenue:													
Margin	$16,839	$1,603	$13,684	$17,853	$9,524	$15,081	$15,144	$15,528	$17,074	$18,302	$14,656	$24,059	$179,346
Revenue Rounding	$0	($0)	($0)	$0	($0)	$0	($0)	($0)	($0)	($0)	$0	$0	($0)
Rider B - State Tax Adjustment	$0.000	$0.000	$0.000	$0.000	$0.000	$0.000	$0.000	$0.000	$0.000	$0.000	$0.000	$0.000	$0.000
Total Base Non Gas Cost Rate Revenue	$16,839	$1,602	$13,683	$17,853	$9,524	$15,081	$15,144	$15,528	$17,074	$18,302	$14,656	$24,059	$179,346
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$46,737	$4,444	$25,672	$33,496	$17,867	$20,802	$20,889	$21,419	$17,790	$19,070	$15,272	$32,439	$275,897
Rider A - Distribution Charge	$12,759	$1,214	$9,313	$12,151	$6,482	$9,296	$9,335	$9,571	$8,652	$9,275	$7,427	$11,096	$106,570
Rider A - Gas Adjustment Charge	($20,781)	($1,976)	($10,966)	($14,307)	($7,632)	($10,664)	($10,708)	($10,980)	($10,262)	($11,000)	($8,808)	($9,832)	($127,917)
Tax Cuts & Jobs Act Refund	($1,230)	$484	($95)	($123)	($66)	($92)	($92)	($95)	($88)	($95)	($76)	($122)	($1,689)
Total Gas Cost Revenues	$37,485	$4,166	$23,925	$31,216	$16,650	$19,343	$19,423	$19,916	$16,092	$17,249	$13,815	$33,581	$252,860
Total Revenues	$54,324	$5,769	$37,608	$49,069	$26,175	$34,423	$34,567	$35,444	$33,166	$35,551	$28,471	$57,639	$432,206

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
SVIS Sales													
Customers	110	113	117	117	117	121	123	122	117	117	116	117	1,405
Total Volume	573	2,493	7,060	9,222	10,513	7,778	6,093	2,344	728	150	395	375	47,722
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$8,480	$9,288	$10,017	$9,926	$9,523	$10,017	$10,210	$9,835	$9,922	$9,380	$9,304	$10,015	$115,919
All Mcf	$1,187	$5,163	$14,630	$19,109	$21,785	$16,117	$12,625	$4,858	$1,509	$310	$818	$776	$98,886
Bypass Service	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Revenue Rounding	$0	($0)	$0	$0	$0	($0)	($0)	($0)	$0	$0	$0	$0	$1
Rider B - State Tax Adjustment	$0	($5)	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	($4)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$6	$28	$84	$110	$120	$81	$63	$24	$7	$1	$4	$5	$532
Rider H - Gas Procurement Charge	$66	$285	$811	$1,060	$1,208	$894	$700	$269	$84	$17	$45	$43	$5,481
Total Base Non Gas Cost Rate Revenue	$9,740	$14,759	$25,542	$30,204	$32,636	$27,108	$23,599	$14,986	$11,521	$9,709	$10,172	$10,839	$220,815
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$2,336	$11,167	$32,571	$42,660	$47,167	$32,727	$25,612	$9,674	$2,799	$535	$1,626	$1,647	$210,521
Rider A - Distribution Charge	$156	$781	$2,533	$3,328	$3,834	$2,894	$2,268	$866	$261	$52	$139	$128	$17,239
Rider A - Gas Adjustment Charge	($706)	($2,489)	($7,857)	($10,248)	($11,683)	($8,643)	($6,771)	($2,605)	($809)	($166)	($364)	($266)	($52,608)
Rider I - OPEB Surcredit	($40)	($173)	($491)	($642)	($731)	($541)	($424)	($163)	($51)	($10)	($28)	($26)	($3,320)
Tax Cuts & Jobs Act Refund	($39)	($75)	($140)	($183)	($208)	($154)	($121)	($46)	($14)	($3)	($8)	($7)	($998)
Total Gas Cost Revenues	$1,708	$9,211	$26,616	$34,916	$38,378	$26,283	$20,565	$7,725	$2,186	$407	$1,366	$1,475	$170,834
Total Revenues	$11,448	$23,970	$52,158	$65,120	$71,014	$53,391	$44,163	$22,711	$13,707	$10,116	$11,537	$12,314	$391,650

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
SVIS SATC													
Customers	14	14	14	15	14	11	11	10	10	10	10	10	143
Total Volume	38	267	800	1,424	949	633	519	160	10	52	(18)	54	4,887
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$1,066	$1,148	$1,163	$1,369	$1,011	$902	$902	$885	$738	$1,081	$554	$969	$11,788
All Mcf	$80	$553	$1,659	$2,951	$1,965	$1,311	$1,075	$332	$21	$107	($38)	$112	$10,127
Revenue Rounding	($0)	$0	$0	$0	$0	$0	$0	$0	($0)	$0	($0)	$0	($0)
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$1,146	$1,701	$2,822	$4,320	$2,976	$2,213	$1,977	$1,217	$759	$1,188	$516	$1,082	$21,915
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$1	$4	$15	$26	$18	$12	$10	$3	$0	$1	($0)	$1	$90
Rider A - Distribution Charge	$10	$80	$287	$514	$345	$235	$193	$59	$3	$19	($7)	$19	$1,759
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($3)	($19)	($56)	($99)	($66)	($44)	($36)	($11)	($1)	($4)	$1	($4)	($340)
Tax Cuts & Jobs Act Refund	($3)	($6)	($16)	($28)	($19)	($13)	($10)	($3)	($0)	($1)	$0	($1)	($99)
Total Gas Cost Revenues	$6	$61	$231	$413	$278	$191	$156	$48	$3	$15	($5)	$15	$1,410
Total Revenues	$1,151	$1,761	$3,052	$4,733	$3,254	$2,403	$2,133	$1,265	$762	$1,203	$510	$1,097	$23,325

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
SVIS MMT													
Customers	57	57	57	58	58	62	65	66	66	66	66	67	745
Total Volume	380	2,005	3,945	5,718	5,995	4,848	3,993	1,448	415	271	205	305	29,527
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$4,311	$4,592	$4,734	$4,978	$4,637	$5,067	$5,149	$5,242	$5,313	$5,427	$5,142	$5,401	$59,992
All Mcf	$786	$4,155	$8,174	$11,849	$12,423	$10,046	$8,275	$3,000	$860	$562	$424	$632	$61,186
Revenue Rounding	($0)	($0)	$0	($0)	$0	$0	$0	($0)	($0)	$0	($0)	($0)	($0)
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$5,098	$8,747	$12,908	$16,827	$17,060	$15,113	$13,424	$8,242	$6,172	$5,989	$5,565	$6,033	$121,178
Gas Cost Revenues:													
MMT Gas Cost Charge	$140	$742	$1,460	$2,116	$2,218	$1,794	$1,478	$563	$200	$127	$96	$143	$11,078
Rider I - OPEB Surcredit	($9)	($45)	($88)	($127)	($133)	($108)	($89)	($32)	($9)	($6)	($5)	($7)	($657)
Tax Cuts & Jobs Act Refund	($20)	($37)	($71)	($103)	($108)	($87)	($72)	($26)	($7)	($5)	($4)	($5)	($544)
Priority Standby	$0	$351	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$351
Total Gas Cost Revenues	$112	$1,012	$1,301	$1,886	$1,977	$1,599	$1,317	$505	$184	$116	$88	$131	$10,229
Total Revenues	$5,210	$9,759	$14,209	$18,713	$19,037	$16,712	$14,741	$8,748	$6,356	$6,105	$5,653	$6,164	$131,407

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
IVIS Sales													
Customers	58	58	60	61	62	59	60	57	55	56	57	57	698
Total Volume	8,912	8,466	19,200	25,415	25,600	21,919	18,348	9,714	4,636	3,755	7,627	4,039	157,630
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$13,547	$14,311	$15,645	$16,002	$15,277	$15,571	$14,715	$14,322	$13,860	$14,607	$13,782	$14,691	$176,329
All Mcf	$11,894	$11,299	$25,626	$33,921	$34,147	$29,256	$24,489	$12,965	$6,188	$5,012	$10,179	$5,390	$210,368
Revenue Rounding	($0)	$0	$1	$0	$1	$1	$0	$0	($0)	$0	($0)	$0	$3
Rider B - State Tax Adjustment	$0	$0	$0	$0	$3	$0	$0	$0	$0	$0	$0	$0	$3
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$89	$89	$227	$303	$296	$228	$191	$100	$43	$35	$82	$49	$1,733
Rider H - Gas Procurement Charge	$1,024	$973	$2,206	$2,920	$2,943	$2,519	$2,108	$1,116	$533	$431	$876	$464	$18,113
Total Base Non Gas Cost Rate Revenue	$26,554	$26,672	$43,705	$53,147	$52,668	$47,574	$41,503	$28,504	$20,623	$20,085	$24,919	$20,594	$406,549
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$36,718	$36,018	$88,517	$117,580	$116,087	$92,260	$77,132	$40,583	$17,964	$14,571	$31,397	$17,542	$686,369
Rider A - Distribution Charge	$2,435	$2,511	$6,877	$9,174	$9,317	$8,155	$6,829	$3,606	$1,668	$1,351	$2,682	$1,388	$55,994
Rider I - OPEB Surcredit	($1,148)	($866)	($1,969)	($2,607)	($2,621)	($2,248)	($1,882)	($996)	($476)	($385)	($782)	($414)	($16,394)
Tax Cuts & Jobs Act Refund	($551)	($79)	($190)	($251)	($244)	($217)	($181)	($96)	($46)	($37)	($75)	($40)	($2,007)
DMT Standby Overrun Charges	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Gas Cost Revenues	$26,973	$27,773	$71,859	$95,653	$93,819	$73,591	$61,508	$32,302	$13,958	$11,327	$26,138	$15,434	$550,336
Total Revenues	$53,527	$54,445	$115,564	$148,800	$146,486	$121,166	$103,011	$60,805	$34,581	$31,412	$51,058	$36,028	$956,884

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
IVIS SATC													
Customers	4	4	3	3	3	4	4	4	4	4	4	4	45
Total Volume	289	869	1,622	1,859	1,672	1,472	873	411	37	59	1	39	9,204
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$1,008	$1,008	$756	$756	$756	$1,008	$1,008	$963	$1,008	$1,008	$1,008	$922	$11,209
All Mcf	$386	$1,160	$2,165	$2,481	$2,232	$1,965	$1,165	$549	$49	$79	$1	$53	$12,285
Revenue Rounding	($0)	$0	$0	$0	$0	$0	$0	$0	($0)	($0)	$0	$0	$0
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$1,394	$2,168	$2,921	$3,237	$2,988	$2,973	$2,173	$1,512	$1,057	$1,087	$1,009	$974	$23,494
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$5	$15	$30	$34	$31	$27	$16	$8	$1	$1	$0	$1	$168
Rider A - Distribution Charge	$79	$271	$581	$671	$611	$548	$325	$152	$13	$21	($0)	$14	$3,286
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($36)	($89)	($166)	($191)	($172)	($151)	($90)	($42)	($4)	($6)	($0)	($4)	($950)
Tax Cuts & Jobs Act Refund	($14)	($9)	($16)	($18)	($17)	($15)	($9)	($4)	($0)	($1)	$0	($0)	($103)
Total Gas Cost Revenues	$34	$188	$429	$496	$454	$409	$243	$114	$9	$16	($0)	$10	$2,402
Total Revenues	$1,428	$2,357	$3,350	$3,733	$3,442	$3,383	$2,416	$1,626	$1,066	$1,103	$1,009	$984	$25,896

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

IVIS MMT	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
Customers	271	271	273	273	273	269	264	265	262	262	263	263	3,208
Total Volume	168,696	171,704	236,659	264,836	306,179	268,376	243,684	176,422	132,405	109,024	106,073	113,410	2,297,469
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$69,973	$68,559	$71,221	$69,194	$68,593	$68,522	$65,426	$67,237	$69,638	$65,536	$66,705	$67,867	$818,473
All Mcf	$187,708	$204,018	$303,038	$353,476	$408,657	$358,202	$325,246	$231,468	$164,996	$122,037	$117,805	$125,860	$2,902,511
LBS Demand Margin	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
LBS Commodity Margin	$8,863	$6,850	$3,277	$0	$0	$0	$0	$1,085	$3,098	$5,959	$5,946	$6,410	$41,488
DUAL IVIS Margin	$1,005	$1,005	$1,005	$1,005	$1,005	$6	$0	$0	$0	$0	$0	$0	$5,033
Revenue Rounding	$0	($0)	($0)	($0)	($0)	($0)	$0	($0)	($0)	($0)	($0)	($0)	($1)
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$267,550	$280,432	$378,542	$423,676	$478,256	$426,730	$390,672	$299,789	$237,733	$193,533	$190,456	$200,137	$3,767,505
Gas Cost Revenues:													
MMT Gas Cost Charge	$62,417	$63,530	$87,564	$97,989	$113,286	$99,299	$90,163	$65,631	$62,167	$51,245	$49,855	$53,303	$896,450
Rider A - Natural Gas Supply Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider A - Distribution Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($9,529)	($9,978)	($14,803)	($17,243)	($19,914)	($17,341)	($15,740)	($11,201)	($7,985)	($5,906)	($5,701)	($6,091)	($141,431)
Tax Cuts & Jobs Act Refund	($7,389)	($491)	($1,714)	($1,997)	($2,307)	($2,011)	($1,825)	($1,299)	($926)	($685)	($661)	($706)	($22,010)
Priority Standby	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Gas Cost Revenues	$45,499	$53,062	$71,048	$78,749	$91,066	$79,947	$72,598	$53,130	$53,257	$44,655	$43,493	$46,506	$733,009
Total Revenues	$313,049	$333,494	$449,589	$502,425	$569,322	$506,678	$463,270	$352,920	$290,989	$238,188	$233,949	$246,643	$4,500,514

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
IVIS DMT													
Customers	23	23	23	23	23	24	23	24	24	24	24	24	282
Transportation Volume	41,960	54,918	70,688	70,079	88,109	79,791	63,742	59,345	42,453	36,881	36,321	38,541	682,827
Sales - Mcf	0	0	0	10	90	0	0	0	0	0	0	0	100
Total Volume	41,960	54,918	70,688	70,089	88,199	79,791	63,742	59,345	42,453	36,881	36,321	38,541	682,927
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$5,796	$5,796	$5,796	$5,796	$5,796	$6,048	$5,796	$6,048	$6,048	$6,048	$6,048	$6,048	$71,064
Transportation Volume	$56,004	$73,299	$94,348	$93,534	$117,599	$106,497	$85,077	$79,207	$56,662	$49,225	$48,477	$51,441	$911,369
Sales - Mcf	$0	$0	$0	$14	$120	$0	$0	$0	$0	$0	$0	$0	$134
Revenue Rounding	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$0	$0	$0	$0	$1	$0	$0	$0	$0	$0	$0	$0	$1
Rider H - Gas Procurement Charge	$0	$0	$0	$1	$10	$0	$0	$0	$0	$0	$0	$0	$12
Total Base Non Gas Cost Rate Revenue	$61,800	$79,095	$100,144	$99,345	$123,526	$112,545	$90,873	$85,255	$62,710	$55,273	$54,525	$57,489	$982,580
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$0	$0	$0	$47	$416	$0	$0	$0	$0	$0	$0	$0	$463
Rider A - Distribution Charge	$0	$0	$0	$4	$32	$0	$0	$0	$0	$0	$0	$0	$36
Rider A - Gas Adjustment Charge	$0	$0	$0	($11)	($100)	$0	$0	$0	$0	$0	$0	$0	($111)
Rider I - OPEB Surcredit	($2,802)	($3,547)	($4,566)	($4,527)	($5,700)	($5,154)	($4,117)	($3,833)	($2,742)	($2,382)	($2,346)	($2,489)	($44,206)
Tax Cuts & Jobs Act Refund	($2,215)	($411)	($529)	($525)	($661)	($598)	($477)	($444)	($318)	($276)	($272)	($289)	($7,017)
Market Rate Differential	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DMT Standby Overrun Charges	$0	$0	$0	$13	$117	$0	$0	$0	$0	$0	$0	$0	$131
Overdelivery Charges	$5,630	$7,850	$8,682	$10,469	$13,234	$10,834	$7,982	$8,014	$7,098	$6,659	$6,964	$6,567	$99,984
Total Gas Cost Revenues	$613	$3,891	$3,587	$5,469	$7,339	$5,083	$3,387	$3,736	$4,038	$4,001	$4,346	$3,789	$49,280
Total Revenues	$62,412	$82,987	$103,731	$104,815	$130,866	$117,628	$94,260	$88,991	$66,748	$59,274	$58,871	$61,278	$1,031,860

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
LVIS MMT													
Customers	9	9	9	8	8	8	8	8	8	8	8	8	99
Total Volume	55,687	69,953	82,146	37,555	40,231	39,309	41,032	35,069	36,874	31,529	34,264	36,826	540,475
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$8,184	$8,184	$8,184	$7,161	$7,161	$7,161	$7,161	$7,161	$7,161	$7,161	$7,161	$7,161	$89,001
All Mcf	$57,040	$71,653	$84,142	$38,468	$41,209	$40,264	$42,029	$35,921	$37,770	$32,295	$35,097	$37,721	$553,609
Bypass Service	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Revenue Rounding	($0)	$0	($0)	($0)	($0)	$0	$0	($0)	$0	$0	($0)	$0	($0)
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$65,224	$79,837	$92,326	$45,629	$48,370	$47,425	$49,190	$43,082	$44,931	$39,456	$42,258	$44,882	$642,610
Gas Cost Revenues:													
MMT Gas Cost Charge	$20,604	$25,883	$30,394	$13,895	$14,885	$14,544	$15,182	$12,976	$17,331	$14,819	$16,104	$17,308	$213,925
Rider I - OPEB Surcredit	($3,812)	($4,404)	($5,172)	($2,364)	($2,533)	($2,475)	($2,583)	($2,208)	($2,322)	($1,985)	($2,157)	($2,319)	($34,335)
Tax Cuts & Jobs Act Refund	($607)	($108)	($127)	($58)	($62)	($61)	($64)	($54)	($57)	($49)	($53)	($57)	($1,358)
Priority Standby	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Gas Cost Revenues	$16,185	$21,370	$25,095	$11,473	$12,290	$12,008	$12,535	$10,713	$14,952	$12,785	$13,894	$14,933	$178,232
Total Revenues	$81,409	$101,207	$117,421	$57,101	$60,660	$59,434	$61,725	$53,795	$59,883	$52,241	$56,151	$59,814	$820,842

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
LVIS DMT													
Customers	20	20	20	21	20	20	21	21	21	21	21	21	247
Transportation Volume	117,375	220,268	285,769	170,346	243,017	175,317	211,824	226,934	147,750	117,070	122,043	119,896	2,157,609
Sales - Mcf	0	5,991	3,542	270	0	0	0	4,790	0	0	0	0	14,593
Total Volume	117,375	226,259	289,311	170,617	243,017	175,317	211,824	231,724	147,750	117,070	122,043	119,896	2,172,202
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$20,460	$20,460	$20,460	$20,460	$20,460	$20,460	$21,483	$21,483	$21,483	$21,483	$21,483	$21,483	$251,658
Transportation Volume	$120,229	$225,678	$292,888	$174,683	$249,150	$179,768	$216,971	$232,448	$151,340	$119,914	$125,008	$122,810	$2,210,889
Sales - Mcf	$0	$6,137	$3,628	$277	$0	$0	$0	$4,906	$0	$0	$0	$0	$14,947
Revenue Rounding	$0	($0)	$0	($0)	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$0	$60	$42	$3	$0	$0	$0	$50	$0	$0	$0	$0	$155
Rider H - Gas Procurement Charge	$0	$688	$407	$31	$0	$0	$0	$550	$0	$0	$0	$0	$1,677
Total Base Non Gas Cost Rate Revenue	$140,689	$253,023	$317,425	$195,454	$269,610	$200,228	$238,454	$259,438	$172,823	$141,397	$146,491	$144,293	$2,479,326
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$0	$24,684	$16,385	$1,250	$0	$0	$0	$20,135	$0	$0	$0	$0	$62,454
Rider A - Distribution Charge	$0	$1,637	$1,278	$98	$0	$0	$0	$1,783	$0	$0	$0	$0	$4,795
Rider A - Gas Adjustment Charge	$0	($7,046)	($3,936)	($300)	$0	$0	$0	($5,323)	$0	$0	$0	$0	($16,605)
Rider I - OPEB Surcredit	($8,035)	($13,842)	($17,912)	($10,635)	($15,197)	($10,951)	($13,336)	($14,288)	($9,302)	($7,371)	($7,684)	($7,549)	($136,101)
Tax Cuts & Jobs Act Refund	($1,279)	($341)	($441)	($262)	($374)	($270)	($328)	($352)	($229)	($181)	($189)	($186)	($4,432)
Market Rate Differential	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DMT Standby Overrun Charges	$0	$2,616	$4,451	$340	$0	$0	$0	$2,210	$0	$0	$0	$0	$9,617
Overdelivery Charges	$16,945	$13,439	$17,371	$18,609	$27,989	$16,295	$16,163	$21,681	$16,241	$13,732	$16,462	$15,312	$210,237
Total Gas Cost Revenues	$7,631	$21,148	$17,196	$9,098	$12,418	$5,074	$2,498	$25,846	$6,710	$6,179	$8,589	$7,578	$129,965
Total Revenues	$148,320	$274,171	$334,621	$204,552	$282,027	$205,302	$240,953	$285,284	$179,533	$147,577	$155,080	$151,870	$2,609,290

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
LIS DMT Negotiated													
Customers	0	0	0	1	0	0	0	0	0	0	0	0	1
Transportation Volumes	0	0	0	37,749	0	0	0	0	0	0	0	0	37,749
Sales - Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Volume	0	0	0	37,749	0	0	0	0	0	0	0	0	37,749
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$0	$0	$0	$1,023	$0	$0	$0	$0	$0	$0	$0	$0	$1,023
Transportation Volumes	$0	$0	$0	$9,437	$0	$0	$0	$0	$0	$0	$0	$0	$9,437
Sales - Mcf	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Revenue Rounding	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider H - Gas Procurement Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$0	$0	$0	$10,460	$0	$0	$0	$0	$0	$0	$0	$0	$10,460
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider A - Distribution Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	$0	$0	$0	($2,377)	$0	$0	$0	$0	$0	$0	$0	$0	($2,377)
Tax Cuts & Jobs Act Refund	$0	$0	$0	($59)	$0	$0	$0	$0	$0	$0	$0	$0	($59)
DMT Standby Overrun Charges	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Overdelivery Charges	$0	$0	$0	$1,874	$0	$0	$0	$0	$0	$0	$0	$0	$1,874
Total Gas Cost Revenues	$0	$0	$0	($562)	$0	$0	$0	$0	$0	$0	$0	$0	($562)
Total Revenues	$0	$0	$0	$9,899	$0	$0	$0	$0	$0	$0	$0	$0	$9,899

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

LIS MMT	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
Customers	1	1	1	1	1	1	1	1	1	1	1	1	12
Gas Cost Revenues:													
Tax Cuts & Jobs Act Refund	($290)	($58)	($56)	($50)	($70)	($68)	($68)	($31)	($48)	($56)	($58)	($54)	($907)
Priority Standby	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Gas Cost Revenues	$6,805	$10,090	$9,678	$8,563	$12,040	$11,666	$11,736	$5,291	$10,566	$12,500	$12,940	$12,045	$123,919
Total Revenues	$20,047	$28,436	$27,323	$24,310	$33,705	$32,695	$32,884	$15,464	$25,742	$30,240	$31,264	$29,182	$331,295

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
LIS DMT													
Customers	10	10	10	10	11	11	13	11	11	12	11	11	131
Transportation Volumes	196,395	275,428	335,804	325,513	406,715	360,513	344,804	309,031	255,470	224,252	234,763	234,006	3,502,694
Sales - Mcf	0	4,365	120	791	138	0	0	0	511	0	0	28	5,952
Total Volume	196,395	279,793	335,924	326,303	406,853	360,513	344,804	309,031	255,981	224,252	234,763	234,034	3,508,646
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$10,485	$10,485	$10,485	$10,485	$10,485	$10,485	$10,485	$10,485	$10,485	$10,485	$10,485	$10,485	$125,820
Transportation Volumes	$117,700	$165,064	$201,247	$195,080	$243,744	$216,056	$206,641	$185,202	$153,103	$134,394	$140,693	$140,240	$2,099,164
Sales - Mcf	$0	$2,616	$72	$0	$0	$0	$0	$0	$306	$0	$0	$0	$2,994
Revenue Rounding	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$0	$44	$1	$0	$0	$0	$0	$0	$5	$0	$0	$0	$50
Rider H - Gas Procurement Charge	$0	$502	$14	$0	$0	$0	$0	$0	$59	$0	$0	$0	$574
Total Base Non Gas Cost Rate Revenue	$128,185	$178,710	$211,819	$205,565	$254,229	$226,541	$217,126	$195,687	$163,958	$144,879	$151,178	$150,725	$2,228,603
Gas Cost Revenues:													
Rider I - OPEB Surcredit	($3,523)	($4,410)	($5,376)	($5,211)	($6,512)	($5,772)	($5,520)	($4,948)	($4,090)	($3,590)	($3,759)	($3,746)	($56,457)
Tax Cuts & Jobs Act Refund	($2,824)	($562)	($685)	($664)	($830)	($735)	($703)	($630)	($521)	($457)	($479)	($477)	($9,569)
DMT Standby Overrun Charges	$0	$1,721	$138	$0	$0	$0	$0	$0	$197	$0	$0	$0	$2,056
Overdelivery Charges	$13,661	$17,305	$16,713	$19,870	$20,202	$18,021	$17,240	$21,372	$16,435	$20,206	$19,248	$19,095	$219,367
Total Gas Cost Revenues	$7,313	$28,098	$11,255	$13,995	$12,860	$11,513	$11,016	$15,794	$13,620	$16,159	$15,010	$14,871	$171,506
Total Revenues	$135,498	$206,808	$223,074	$219,560	$267,090	$238,054	$228,142	$211,482	$177,578	$161,038	$166,189	$165,596	$2,400,108

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

LIS DMT Negotiated	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
Customers	7	7	7	7	7	7	7	7	7	8	8	8	87
Transportation Volumes	339,884	370,081	389,714	436,026	505,718	489,927	478,413	473,181	401,818	535,921	497,774	590,786	5,509,243
Sales - Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Volume	339,884	370,081	389,714	436,026	505,718	489,927	478,413	473,181	401,818	535,921	497,774	590,786	5,509,243
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$9,320	$9,320	$9,320	$9,320	$10,485	$10,485	$10,485	$10,485	$10,485	$11,650	$11,650	$11,650	$124,655
Transportation Volumes	$117,895	$128,693	$135,289	$158,542	$170,872	$168,164	$167,589	$168,015	$143,466	$165,570	$152,917	$184,270	$1,861,282
Sales - Mcf	$0	$0	$0	$474	$83	$0	$0	$0	$0	$0	$0	$17	$573
Revenue Rounding	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	($0)	$0
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$0	$0	$0	$9	$2	$0	$0	$0	$0	$0	$0	$0	$11
Rider H - Gas Procurement Charge	$0	$0	$0	$91	$16	$0	$0	$0	$0	$0	$0	$3	$110
Total Base Non Gas Cost Rate Revenue	$127,215	$138,013	$144,609	$168,436	$181,457	$178,649	$178,074	$178,500	$153,951	$177,220	$164,567	$195,940	$1,986,631
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$0	$0	$0	$3,657	$637	$0	$0	$0	$0	$0	$0	$120	$4,415
Rider A - Distribution Charge	$0	$0	$0	$285	$50	$0	$0	$0	$0	$0	$0	$9	$345
Rider A - Gas Adjustment Charge	$0	$0	$0	($878)	($153)	$0	$0	$0	$0	$0	$0	($20)	($1,052)
Rider I - OPEB Surcredit	($5,439)	($5,334)	($5,492)	($6,288)	($7,268)	($6,990)	($6,768)	($6,734)	($5,920)	($7,960)	($7,435)	($8,835)	($80,463)
Tax Cuts & Jobs Act Refund	($4,360)	($680)	($700)	($801)	($892)	($891)	($862)	($858)	($754)	($1,014)	($947)	($1,118)	($13,877)
Market Rate Differential	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DMT Standby Overrun Charges	$0	$0	$0	$909	$167	$0	$0	$0	$0	$0	$0	$14	$1,090
Overdelivery Charges	$25,474	$29,556	$23,173	$23,535	$29,573	$24,766	$26,390	$24,079	$28,617	$47,916	$52,024	$46,080	$381,182
Total Gas Cost Revenues	$15,675	$23,543	$16,982	$20,419	$22,114	$16,885	$18,759	$16,487	$21,942	$38,942	$43,641	$36,251	$291,640
Total Revenues	$142,890	$161,556	$161,591	$188,854	$203,571	$195,534	$196,834	$194,987	$175,893	$216,162	$208,208	$232,191	$2,278,271

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2024

DMLMT Negotiated	Oct 23	Nov 23	Dec 23	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Total
Customers	1	1	1	1	1	1	1	1	1	0	0	0	9
Total Volume	157,462	117,772	162,967	196,209	202,835	190,156	133,281	165,046	259,393	(129,696)	0	0	1,455,425
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$1,165	$1,165	$1,165	$1,165	$1,165	$1,165	$1,165	$1,165	$2,330	($1,165)	$0	$0	$10,485
Interstate Volume	$22,659	$16,947	$23,451	$28,234	$29,188	$27,364	$19,179	$23,750	$37,327	($18,663)	$0	$0	$209,436
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider H - Gas Procurement Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Base Non Gas Cost Rate Revenue	$23,824	$18,112	$24,616	$29,399	$30,353	$28,529	$20,344	$24,915	$39,657	($19,828)	$0	$0	$219,921
Gas Cost Revenues:													
Tax Cuts & Jobs Act Refund	($2,264)	($240)	($332)	($400)	($414)	($388)	($272)	($337)	($529)	$265	$0	$0	($4,912)
OPEB Surcredit - Rider I	($2,825)	($1,886)	($2,609)	($3,141)	($3,247)	($3,044)	($2,134)	($2,642)	($4,153)	$2,076	$0	$0	($23,605)
Rider A - Natural Gas Supply Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider A - Distribution Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DMT Standby Overrun Charges	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Overdelivery Charges	$17,820	$20,647	$32,828	$17,065	$20,136	$23,199	$34,282	$24,263	$54,609	($27,305)	$0	$0	$217,544
Total Gas Cost Revenues	$12,730	$18,521	$29,887	$13,523	$16,475	$19,767	$31,876	$21,284	$49,927	($24,964)	$0	$0	$189,027
Total Revenues	$36,554	$36,634	$54,503	$42,923	$46,828	$48,295	$52,220	$46,199	$89,584	($44,792)	$0	$0	$408,947

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-H-Operating Revenues
Delivered on January 28, 2026

III-H.2

Request:

State the manner in which revenues are being presented for ratemaking purposes, and provide details, using one of the following methods:

III.H.2.a Unbilled Revenues.
III.H.2.b Billed Revenues.
III.H.2.c Cash Revenues.

Response:

Revenues are reported for rate making purposes on an "as billed" basis. Unbilled revenues are not included in the Future Test Year or Fully Projected Future Test Year.

Prepared by or under the supervision of: Courtney T. Mann

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-H-Operating Revenues
Delivered on January 28, 2026

III-H.3

Request:

If unbilled revenue is recorded at the end of the public utility's fiscal period, provide unbilled revenue at the end of the HTY, at the year-end immediately preceding the HTY and at the beginning of the FTY. State whether recovery is reversed for ratemaking purposes and the impact on the FPFTY. Provide a detailed explanation of the procedures and methods used in developing unbilled revenues and the impact on the FTY and the FPFTY.

Response:

Please see Exhibit CTM-5-1 for HTY Unbilled Revenue. See below for the year-end preceding HTY unbilled revenue. Unbilled revenues are not included in the Future Test Year or Fully Projected Future Test Year.

TME 09/30/2024	Total Revenue	Total Gas Cost	Total Delivery
Gas Revenue	(87,750)	(89,669)	1,919
Transportation Revenue	44,083	0	44,083
Total Unbilled Revenue	**(43,667)**	**(89,669)**	**46,002**

Prepared by or under the supervision of: Courtney T. Mann

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-H-Operating Revenues
Delivered on January 28, 2026

III-H.4

Request:

Provide a schedule of present rates and proposed rates showing dollar change and percent of change by customer class. Prepare a comparative schedule of monthly (or quarterly where applicable) billings at present rates and at proposed rates to demonstrate the impact of proposed rates over a range of usages. Identify any changes in rate design or any rate re-structure and provide supporting explanations.

Response:

Please see Exhibit CTM-8 for a schedule of present and proposed rates and Exhibit CTM-9 for a comparative schedule of monthly bills. Please refer to the testimony and exhibits of Courtney T. Mann for changes in rate design and supporting explanations.

Prepared by or under the supervision of: Courtney T. Mann

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-H-Operating Revenues
Delivered on January 28, 2026

III-H.5

Request:

Provide a detailed breakdown of miscellaneous revenues for the HTY and the 2 years immediately preceding the HTY. For the HTY, provide a monthly breakdown and an explanation of monthly variances greater than 15%. Detail any anticipated variances in the FTY and the FPFTY ON AN ANNUAL BASIS.

Response:

Please see attachment III-H-5 for a monthly breakdown of miscellaneous revenues for the HTY and 2 years immediately preceding the HTY. Forfeited discounts variances are due to seasonality of late payment charges. Rent from gas property variances greater than 15% are due to annual adjustments. Capacity release variances are due to seasonality/random variation. TCJA variances are due to monthly revenue seasonality and adjusted provision estimates throughout the fiscal year. Other gas revenues variances are due to miscellaneous activity. Rent is held flat in the FTY and FPFTY. Within other revenues, capacity release has been removed from the FTY, FPFTY, and HTY normalized schedules. In the FTY and FPFTY, late payment charges are forecasted by applying a percentage to total forecasted revenues by month.

Prepared by or under the supervision of: Courtney T. Mann

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-H-Operating Revenues
Delivered on January 28, 2026

III-H.6

Request:

Provide for the HTY, the 2 years immediately preceding the HTY, the FTY and the FPFTY all of the following by customer class:

III.H.6.a Monthly customer counts.
III.H.6.b Monthly customer usage.

Response:

Please see Attachment III-H.6.

Prepared by or under the supervision of: Cathryn E. Hilliard

National Fuel Gas Distribution Corporation
Pennsylvania Division
Number of Accounts - Monthly
2 years before Historical Test Year (Oct 2022 - Sep 2023)

	Actuals (HTY-2)											
	Oct-22	**Nov-22**	**Dec-22**	**Jan-23**	**Feb-23**	**Mar-23**	**Apr-23**	**May-23**	**Jun-23**	**Jul-23**	**Aug-23**	**Sep-23**
Retail Sales												
Residential	177,868	178,695	179,584	180,178	180,447	180,700	180,616	180,093	179,415	178,761	178,454	178,292
Commercial	10,987	11,057	11,140	11,202	11,198	11,206	11,162	11,076	10,955	10,895	10,872	10,835
Industrial	186	182	175	178	180	180	178	176	175	172	173	174
Public Authority	647	645	649	641	615	615	617	618	609	602	586	574
Subtotal Retail Sales	**189,688**	**190,579**	**191,548**	**192,199**	**192,440**	**192,701**	**192,573**	**191,963**	**191,154**	**190,430**	**190,085**	**189,875**
Company Use	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
Total Retail Sales	**189,688**	**190,579**	**191,548**	**192,199**	**192,440**	**192,701**	**192,573**	**191,963**	**191,154**	**190,430**	**190,085**	**189,875**
Transportation Service												
Residential MMT Transportation	373	352	353	369	385	384	390	389	393	494	497	497
Commercial MMT Transportation	2,610	2,621	2,628	2,662	2,699	2,712	2,753	2,756	2,752	2,748	2,749	2,747
Industrial MMT Transportation	331	331	341	341	340	341	338	339	339	340	339	337
Public Authority MMT Transportation	489	490	487	494	521	521	519	520	525	529	548	555
Total MMT Service	**3,803**	**3,794**	**3,809**	**3,866**	**3,945**	**3,958**	**4,000**	**4,004**	**4,009**	**4,111**	**4,133**	**4,136**
Residential SATC Transportation	17,344	17,253	17,166	17,122	17,045	16,929	16,727	16,593	16,576	16,608	16,516	16,432
Commercial SATC Transportation	1,266	1,250	1,249	1,247	1,244	1,217	1,187	1,184	1,200	1,200	1,196	1,198
Industrial SATC Transportation	19	19	19	19	18	19	20	20	19	18	18	18
Public Authority SATC Transportation	62	64	62	62	61	58	56	57	56	56	56	58
Total SATC Service	**18,691**	**18,586**	**18,496**	**18,450**	**18,368**	**18,223**	**17,990**	**17,854**	**17,851**	**17,882**	**17,786**	**17,706**
Residential DMT Transportation (CTS)												
Commercial DMT Transportation (CTS)	13	13	13	12	12	12	12	12	13	13	13	13
Industrial DMT Transportation (CTS)	60	60	60	61	62	61	61	61	60	60	60	61
Public Authority DMT Transportation (CTS)	2	2	2	2	2	2	2	2	2	2	2	2
Total DMT Service	**75**	**75**	**75**	**75**	**76**	**75**	**75**	**75**	**75**	**75**	**75**	**76**
Residential Transportation Service	17,717	17,605	17,519	17,491	17,430	17,313	17,117	16,982	16,969	17,102	17,013	16,929
Commercial Transportation Service	3,889	3,884	3,890	3,921	3,955	3,941	3,952	3,952	3,965	3,961	3,958	3,958
Industrial Transportation Service	410	410	420	421	420	421	419	420	418	418	417	416
Public Authority Transportation Service	553	556	551	558	584	581	577	579	583	587	606	615
Total Transportation	**22,569**	**22,455**	**22,380**	**22,391**	**22,389**	**22,256**	**22,065**	**21,933**	**21,935**	**22,068**	**21,994**	**21,918**
Total	**212,257**	**213,034**	**213,928**	**214,590**	**214,829**	**214,957**	**214,638**	**213,896**	**213,089**	**212,498**	**212,079**	**211,793**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Number of Accounts - Monthly
Year before Historical Test Year (Oct 2023 - Sep 2024)

	Actuals (HTY-1)											
	Oct-23	**Nov-23**	**Dec-23**	**Jan-24**	**Feb-24**	**Mar-24**	**Apr-24**	**May-24**	**Jun-24**	**Jul-24**	**Aug-24**	**Sep-24**
Retail Sales												
Residential	178,601	179,421	180,400	180,968	181,200	181,244	181,229	180,294	179,565	178,999	178,364	178,021
Commercial	10,853	10,957	11,030	11,112	11,154	11,174	11,161	11,102	11,009	10,941	10,931	10,915
Industrial	171	173	178	179	180	181	185	182	176	174	174	175
Public Authority	573	575	577	576	583	585	584	584	579	577	580	581
Subtotal Retail Sales	**190,198**	**191,126**	**192,185**	**192,835**	**193,117**	**193,184**	**193,159**	**192,162**	**191,329**	**190,691**	**190,049**	**189,692**
Company Use	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
Total Retail Sales	**190,198**	**191,126**	**192,185**	**192,835**	**193,117**	**193,184**	**193,159**	**192,162**	**191,329**	**190,691**	**190,049**	**189,692**
Transportation Service												
Residential MMT Transportation	499	502	504	504	505	506	509	508	527	569	569	567
Commercial MMT Transportation	2,748	2,756	2,789	2,799	2,805	2,803	2,805	2,803	2,799	2,808	2,808	2,789
Industrial MMT Transportation	339	338	340	340	340	339	339	340	338	337	338	337
Public Authority MMT Transportation	555	555	556	557	555	552	553	553	564	568	569	566
Total MMT Service	**4,141**	**4,151**	**4,189**	**4,200**	**4,205**	**4,200**	**4,206**	**4,204**	**4,228**	**4,282**	**4,284**	**4,259**
Residential SATC Transportation	16,321	16,250	16,181	16,216	16,202	16,261	16,329	16,491	16,668	16,778	16,971	17,054
Commercial SATC Transportation	1,209	1,205	1,195	1,195	1,191	1,172	1,154	1,138	1,131	1,112	1,103	1,103
Industrial SATC Transportation	18	18	17	17	17	16	15	14	14	14	14	14
Public Authority SATC Transportation	58	59	59	59	60	60	60	60	51	47	48	47
Total SATC Service	**17,606**	**17,532**	**17,452**	**17,487**	**17,470**	**17,509**	**17,558**	**17,703**	**17,864**	**17,951**	**18,136**	**18,218**
Residential DMT Transportation (CTS)												
Commercial DMT Transportation (CTS)	13	13	13	13	13	13	13	13	13	13	12	12
Industrial DMT Transportation (CTS)	61	61	61	62	62	63	63	64	64	64	64	64
Public Authority DMT Transportation (CTS)	2	2	2	2	2	2	2	2	2	2	2	2
Total DMT Service	**76**	**76**	**76**	**77**	**77**	**78**	**78**	**79**	**79**	**79**	**78**	**78**
Residential Transportation Service	16,820	16,752	16,685	16,720	16,707	16,767	16,838	16,999	17,195	17,347	17,540	17,621
Commercial Transportation Service	3,970	3,974	3,997	4,007	4,009	3,988	3,972	3,954	3,943	3,933	3,923	3,904
Industrial Transportation Service	418	417	418	419	419	418	417	418	416	415	416	415
Public Authority Transportation Service	615	616	617	618	617	614	615	615	617	617	619	615
Total Transportation	**21,823**	**21,759**	**21,717**	**21,764**	**21,752**	**21,787**	**21,842**	**21,986**	**22,171**	**22,312**	**22,498**	**22,555**
Total	**212,021**	**212,885**	**213,902**	**214,599**	**214,869**	**214,971**	**215,001**	**214,148**	**213,500**	**213,003**	**212,547**	**212,247**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Number of Accounts - Monthly
Historical Test Year (Oct 2024 - Sep 2025)

	Actuals (HTY)											
	Oct-24	**Nov-24**	**Dec-24**	**Jan-25**	**Feb-25**	**Mar-25**	**Apr-25**	**May-25**	**Jun-25**	**Jul-25**	**Aug-25**	**Sep-25**
Retail Sales												
Residential	177,917	178,287	178,815	179,183	179,155	179,115	178,784	177,999	177,358	176,772	176,382	176,212
Commercial	10,968	11,048	11,156	11,252	11,318	11,367	11,344	11,308	11,181	11,154	11,119	11,111
Industrial	178	183	190	186	187	188	189	187	185	183	178	180
Public Authority	586	591	595	599	599	601	600	605	600	595	593	595
Subtotal Retail Sales	**189,649**	**190,109**	**190,756**	**191,220**	**191,259**	**191,271**	**190,917**	**190,099**	**189,324**	**188,704**	**188,272**	**188,098**
Company Use	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
Total Retail Sales	**189,649**	**190,109**	**190,756**	**191,220**	**191,259**	**191,271**	**190,917**	**190,099**	**189,324**	**188,704**	**188,272**	**188,098**
Transportation Service												
Residential MMT Transportation	567	562	560	555	557	555	560	568	565	565	562	561
Commercial MMT Transportation	2,788	2,801	2,799	2,790	2,770	2,737	2,733	2,705	2,762	2,755	2,755	2,744
Industrial MMT Transportation	339	337	338	337	337	336	335	335	335	333	333	332
Public Authority MMT Transportation	567	562	563	565	565	568	568	566	569	569	569	567
Total MMT Service	**4,261**	**4,262**	**4,260**	**4,247**	**4,229**	**4,196**	**4,196**	**4,174**	**4,231**	**4,222**	**4,219**	**4,204**
Residential SATC Transportation	17,190	17,379	17,622	17,897	18,162	18,308	18,321	18,354	18,378	18,365	18,300	18,349
Commercial SATC Transportation	1,108	1,096	1,097	1,088	1,081	1,071	1,058	1,032	1,009	1,002	989	976
Industrial SATC Transportation	13	13	14	14	14	15	15	15	15	14	14	14
Public Authority SATC Transportation	45	45	44	43	43	43	39	35	35	35	35	35
Total SATC Service	**18,356**	**18,533**	**18,777**	**19,042**	**19,300**	**19,437**	**19,433**	**19,436**	**19,437**	**19,416**	**19,338**	**19,374**
Residential DMT Transportation (CTS)												
Commercial DMT Transportation (CTS)	12	12	12	12	12	10	11	11	11	11	11	11
Industrial DMT Transportation (CTS)	64	64	64	64	64	65	64	64	64	65	65	65
Public Authority DMT Transportation (CTS)	2	2	2	2	2	2	2	2	2	2	2	2
Total DMT Service	**78**	**78**	**78**	**78**	**78**	**77**	**77**	**77**	**77**	**78**	**78**	**78**
Residential Transportation Service	17,757	17,941	18,182	18,452	18,719	18,863	18,881	18,922	18,943	18,930	18,862	18,910
Commercial Transportation Service	3,908	3,909	3,908	3,890	3,863	3,818	3,802	3,748	3,782	3,768	3,755	3,731
Industrial Transportation Service	416	414	416	415	415	416	414	414	414	412	412	411
Public Authority Transportation Service	614	609	609	610	610	613	609	603	606	606	606	604
Total Transportation	**22,695**	**22,873**	**23,115**	**23,367**	**23,607**	**23,710**	**23,706**	**23,687**	**23,745**	**23,716**	**23,635**	**23,656**
Total	**212,344**	**212,982**	**213,871**	**214,587**	**214,866**	**214,981**	**214,623**	**213,786**	**213,069**	**212,420**	**211,907**	**211,754**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Number of Accounts - Monthly
Future Test Year (Oct 2025 - Sep 2026)

	Forecast (FTY)											
	Oct-25	**Nov-25**	**Dec-25**	**Jan-26**	**Feb-26**	**Mar-26**	**Apr-26**	**May-26**	**Jun-26**	**Jul-26**	**Aug-26**	**Sep-26**
Retail Sales												
Residential	179,181	179,464	180,773	181,487	181,829	181,985	181,762	181,189	180,358	179,642	178,924	178,608
Commercial	10,994	11,108	11,277	11,383	11,426	11,411	11,397	11,355	11,252	11,156	11,097	11,084
Industrial	183	182	182	182	183	183	184	183	178	184	180	180
Public Authority	542	542	565	558	532	532	533	534	525	537	520	509
Subtotal Retail Sales	**190,900**	**191,296**	**192,797**	**193,610**	**193,970**	**194,111**	**193,876**	**193,261**	**192,313**	**191,519**	**190,721**	**190,381**
Company Use	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
Total Retail Sales	**190,900**	**191,296**	**192,797**	**193,610**	**193,970**	**194,111**	**193,876**	**193,261**	**192,313**	**191,519**	**190,721**	**190,381**
Transportation Service												
Residential MMT Transportation	523	525	530	531	533	532	534	534	537	575	575	573
Commercial MMT Transportation	2,870	2,877	2,890	2,904	2,906	2,899	2,917	2,925	2,926	2,927	2,947	2,952
Industrial MMT Transportation	337	337	345	345	344	345	341	342	345	336	338	338
Public Authority MMT Transportation	612	613	599	604	631	631	629	630	638	625	642	650
Total MMT Service	**4,342**	**4,352**	**4,364**	**4,384**	**4,414**	**4,407**	**4,421**	**4,431**	**4,446**	**4,463**	**4,502**	**4,513**
Residential SATC Transportation	16,373	16,254	16,215	16,263	16,259	16,328	16,377	16,573	16,740	16,837	17,023	17,108
Commercial SATC Transportation	1,015	1,019	1,009	991	978	953	952	948	942	942	938	936
Industrial SATC Transportation	14	14	14	14	14	14	14	14	14	14	14	14
Public Authority SATC Transportation	44	44	44	44	44	44	44	44	44	44	44	44
Total SATC Service	**17,446**	**17,331**	**17,282**	**17,312**	**17,295**	**17,339**	**17,387**	**17,579**	**17,740**	**17,837**	**18,019**	**18,102**
Residential DMT Transportation (CTS)	-	-	-	-	-	-	-	-	-	-	-	-
Commercial DMT Transportation (CTS)	11	11	11	11	11	11	11	11	11	11	11	11
Industrial DMT Transportation (CTS)	62	62	62	62	62	62	62	62	62	62	62	62
Public Authority DMT Transportation (CTS)	3	3	3	3	3	3	3	3	3	3	3	3
Total DMT Service	**76**	**76**	**76**	**76**	**76**	**76**	**76**	**76**	**76**	**76**	**76**	**76**
Residential Transportation Service	16,896	16,779	16,745	16,794	16,791	16,860	16,911	17,107	17,277	17,412	17,597	17,681
Commercial Transportation Service	3,896	3,907	3,910	3,906	3,895	3,863	3,880	3,884	3,879	3,880	3,896	3,899
Industrial Transportation Service	413	413	421	421	420	421	417	418	421	412	414	414
Public Authority Transportation Service	659	660	646	651	678	678	676	677	685	672	689	697
Total Transportation	**21,864**	**21,759**	**21,722**	**21,772**	**21,784**	**21,822**	**21,884**	**22,086**	**22,262**	**22,376**	**22,596**	**22,691**
Total	**212,764**	**213,055**	**214,519**	**215,382**	**215,754**	**215,933**	**215,760**	**215,347**	**214,575**	**213,895**	**213,317**	**213,072**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Number of Accounts - Monthly
Fully Projected Future Test Year (Nov 2026 - Oct 2027)

	Forecast (FPFTY)											
	Nov-26	**Dec-26**	**Jan-27**	**Feb-27**	**Mar-27**	**Apr-27**	**May-27**	**Jun-27**	**Jul-27**	**Aug-27**	**Sep-27**	**Oct-27**
Retail Sales												
Residential	179,764	181,075	181,788	182,129	182,286	182,063	181,489	180,659	179,943	179,223	178,907	179,781
Commercial	11,209	11,377	11,482	11,524	11,511	11,498	11,455	11,353	11,255	11,198	11,184	11,194
Industrial	182	182	182	185	185	184	183	179	184	181	180	183
Public Authority	509	531	525	499	498	500	500	492	503	487	476	476
Subtotal Retail Sales	**191,664**	**193,165**	**193,977**	**194,337**	**194,480**	**194,245**	**193,627**	**192,683**	**191,885**	**191,089**	**190,747**	**191,634**
Company Use	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
Total Retail Sales	**191,664**	**193,165**	**193,977**	**194,337**	**194,480**	**194,245**	**193,627**	**192,683**	**191,885**	**191,089**	**190,747**	**191,634**
Transportation Service												
Residential MMT Transportation	529	532	533	534	534	536	536	539	577	576	575	528
Commercial MMT Transportation	2,960	2,973	2,987	2,990	2,983	3,000	3,008	3,010	3,011	3,029	3,037	3,037
Industrial MMT Transportation	338	347	347	346	347	343	343	347	338	339	339	341
Public Authority MMT Transportation	651	636	642	668	669	667	667	675	662	679	687	687
Total MMT Service	**4,478**	**4,488**	**4,509**	**4,538**	**4,533**	**4,546**	**4,554**	**4,571**	**4,588**	**4,623**	**4,638**	**4,593**
Residential SATC Transportation	16,281	16,242	16,290	16,286	16,355	16,404	16,600	16,768	16,865	17,051	17,137	16,428
Commercial SATC Transportation	927	917	900	886	861	860	856	850	851	846	845	832
Industrial SATC Transportation	14	14	14	14	14	14	14	14	14	14	14	14
Public Authority SATC Transportation	44	44	44	44	44	44	44	44	44	44	44	44
Total SATC Service	**17,266**	**17,217**	**17,248**	**17,230**	**17,274**	**17,322**	**17,514**	**17,676**	**17,774**	**17,955**	**18,040**	**17,318**
Residential DMT Transportation (CTS)	-	-	-	-	-	-	-	-	-	-	-	-
Commercial DMT Transportation (CTS)	11	11	11	11	11	11	11	11	11	11	11	11
Industrial DMT Transportation (CTS)	62	62	62	62	62	62	62	62	62	62	62	62
Public Authority DMT Transportation (CTS)	3	3	3	3	3	3	3	3	3	3	3	3
Total DMT Service	**76**	**76**	**76**	**76**	**76**	**76**	**76**	**76**	**76**	**76**	**76**	**76**
Residential Transportation Service	16,810	16,773	16,823	16,820	16,889	16,940	17,136	17,306	17,441	17,628	17,712	16,956
Commercial Transportation Service	3,898	3,901	3,898	3,887	3,855	3,871	3,875	3,871	3,873	3,886	3,893	3,880
Industrial Transportation Service	414	423	423	422	423	419	419	423	414	415	415	417
Public Authority Transportation Service	698	683	689	715	716	714	714	722	709	726	734	734
Total Transportation	**21,820**	**21,780**	**21,833**	**21,844**	**21,883**	**21,944**	**22,144**	**22,322**	**22,437**	**22,655**	**22,754**	**21,987**
Total	**213,484**	**214,945**	**215,810**	**216,181**	**216,363**	**216,189**	**215,771**	**215,005**	**214,322**	**213,744**	**213,501**	**213,621**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Actual MCF - Monthly
2 years before Historical Test Year (Oct 2022 - Sep 2023)

	Actuals (HTY-2)											
	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23
Retail Sales												
Residential	760,512	1,179,781	2,397,593	2,853,402	2,646,080	2,418,955	1,806,276	1,115,131	487,428	277,013	262,077	306,576
Commercial	123,002	204,348	395,748	497,284	475,317	418,420	314,296	173,369	88,370	58,478	54,857	62,583
Industrial	9,537	19,742	31,920	40,118	38,879	33,826	29,269	16,492	9,171	7,662	8,304	5,188
Public Authority	8,895	15,329	31,025	38,657	34,718	31,894	24,911	12,872	5,227	3,196	1,827	2,653
Subtotal Retail Sales	**901,945**	**1,419,200**	**2,856,287**	**3,429,461**	**3,194,994**	**2,903,095**	**2,174,752**	**1,317,863**	**590,196**	**346,349**	**327,064**	**377,001**
Company Use	**416**	**836**	**1,910**	**2,289**	**2,163**	**1,997**	**1,336**	**781**	**239**	**124**	**53**	**127**
Total Retail Sales	**902,361**	**1,420,036**	**2,858,197**	**3,431,749**	**3,197,157**	**2,905,092**	**2,176,088**	**1,318,644**	**590,435**	**346,472**	**327,117**	**377,127**
Transportation Service												
Residential MMT Transportation	7,925	15,713	27,456	39,223	36,794	33,314	29,673	17,422	9,871	5,042	4,123	4,576
Commercial MMT Transportation	132,852	231,616	387,203	521,867	488,328	441,725	399,007	241,029	160,565	100,817	89,712	98,174
Industrial MMT Transportation	207,098	263,574	298,906	377,963	359,071	340,795	348,360	253,255	226,307	220,115	231,302	220,171
Public Authority MMT Transportation	60,921	139,182	204,424	294,340	275,845	256,751	255,448	143,435	92,500	45,780	38,894	40,717
Total MMT Service	**408,796**	**650,085**	**917,989**	**1,233,393**	**1,160,038**	**1,072,584**	**1,032,488**	**655,140**	**489,243**	**371,754**	**364,032**	**363,637**
Residential SATC Transportation	77,485	115,202	236,593	276,011	254,260	231,287	171,359	105,934	46,605	26,462	24,981	28,815
Commercial SATC Transportation	12,433	21,034	42,243	54,858	51,232	44,950	32,451	19,130	10,337	6,905	6,479	7,618
Industrial SATC Transportation	500	907	1,873	2,557	2,145	2,285	2,335	1,203	426	179	162	213
Public Authority SATC Transportation	539	909	2,290	2,797	2,348	2,187	1,554	779	434	360	189	158
Total SATC Service	**90,956**	**138,053**	**282,999**	**336,223**	**309,986**	**280,709**	**207,699**	**127,046**	**57,802**	**33,905**	**31,810**	**36,803**
Residential DMT Transportation (CTS)												
Commercial DMT Transportation (CTS)	47,390	59,740	67,006	62,277	62,121	55,997	61,335	49,526	58,847	48,772	45,806	48,854
Industrial DMT Transportation (CTS)	926,908	973,877	1,088,210	1,064,388	1,306,251	1,279,831	1,327,987	1,042,443	876,143	811,808	818,962	889,928
Public Authority DMT Transportation (CTS)	8,742	16,325	21,617	27,160	26,744	23,158	24,756	16,953	5,664	7,544	7,069	6,534
Total DMT Service	**983,040**	**1,049,942**	**1,176,833**	**1,153,825**	**1,395,115**	**1,358,986**	**1,414,078**	**1,108,922**	**940,654**	**868,124**	**871,836**	**945,315**
Residential Transportation Service	85,410	130,915	264,049	315,234	291,054	264,601	201,032	123,356	56,476	31,503	29,104	33,390
Commercial Transportation Service	192,675	312,390	496,452	639,002	601,680	542,672	492,794	309,685	229,749	156,495	141,996	154,645
Industrial Transportation Service	1,134,506	1,238,359	1,388,989	1,444,908	1,667,467	1,622,910	1,678,682	1,296,900	1,102,876	1,032,102	1,050,426	1,110,313
Public Authority Transportation Service	70,202	156,417	228,331	324,296	304,937	282,096	281,757	161,167	98,598	53,683	46,152	47,408
Total Transportation Service	1,482,793	1,838,080	2,377,821	2,723,441	2,865,138	2,712,279	2,654,265	1,891,107	1,487,698	1,273,782	1,267,678	1,345,756
Total Requirements	**2,385,154**	**3,258,116**	**5,236,018**	**6,155,190**	**6,062,295**	**5,617,371**	**4,830,353**	**3,209,751**	**2,078,133**	**1,620,255**	**1,594,795**	**1,722,883**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Actual MCF - Monthly
Year before Historical Test Year (Oct 2023 - Sep 2024)

	Actuals (HTY-1)											
	Oct-23	**Nov-23**	**Dec-23**	**Jan-24**	**Feb-24**	**Mar-24**	**Apr-24**	**May-24**	**Jun-24**	**Jul-24**	**Aug-24**	**Sep-24**
Retail Sales												
Residential	515,815	1,165,677	2,129,797	2,670,066	2,652,931	2,100,785	1,860,712	829,362	416,642	283,551	260,828	302,822
Commercial	86,184	189,582	341,463	453,546	468,547	366,899	318,359	143,420	78,785	60,616	55,319	67,745
Industrial	9,301	10,946	25,442	34,161	37,963	29,314	23,775	12,368	5,131	4,540	7,992	6,202
Public Authority	4,287	12,276	23,237	32,767	32,465	25,612	21,284	10,349	3,698	2,700	1,867	1,939
Subtotal Retail Sales	**615,587**	**1,378,481**	**2,519,939**	**3,190,540**	**3,191,906**	**2,522,609**	**2,224,130**	**995,498**	**504,256**	**351,407**	**326,006**	**378,707**
Company Use	**237**	**745**	**1,583**	**2,147**	**2,202**	**1,712**	**1,308**	**595**	**163**	**73**	**53**	**85**
Total Retail Sales	**615,824**	**1,379,226**	**2,521,522**	**3,192,687**	**3,194,108**	**2,524,322**	**2,225,438**	**996,093**	**504,419**	**351,479**	**326,059**	**378,793**
Transportation Service												
Residential MMT Transportation	6,122	14,877	27,633	33,696	39,597	31,680	27,786	15,644	7,471	5,076	4,493	4,470
Commercial MMT Transportation	114,905	226,844	375,923	462,567	524,876	423,723	370,328	222,123	124,237	96,432	88,762	98,602
Industrial MMT Transportation	228,503	289,113	347,955	338,207	391,316	346,462	322,216	221,648	188,946	172,754	167,956	176,245
Public Authority MMT Transportation	50,194	113,160	201,113	237,298	294,231	236,425	209,456	133,247	62,825	40,530	33,230	38,830
Total MMT Service	**399,723**	**643,993**	**952,624**	**1,071,768**	**1,250,020**	**1,038,290**	**929,787**	**592,662**	**383,480**	**314,792**	**294,441**	**318,146**
Residential SATC Transportation	48,994	107,854	195,733	245,123	242,010	192,005	171,622	77,538	39,125	27,337	24,978	29,107
Commercial SATC Transportation	10,161	23,152	39,512	51,659	52,163	40,524	35,857	15,943	9,658	7,193	6,892	7,588
Industrial SATC Transportation	332	1,136	2,423	3,027	2,844	1,957	1,557	505	127	54	41	47
Public Authority SATC Transportation	367	928	2,029	2,758	2,878	2,295	1,906	681	301	358	216	156
Total SATC Service	**59,854**	**133,070**	**239,696**	**302,568**	**299,895**	**236,780**	**210,942**	**94,667**	**49,211**	**34,943**	**32,127**	**36,897**
Residential DMT Transportation (CTS)												
Commercial DMT Transportation (CTS)	48,425	59,867	70,886	71,078	83,437	72,984	70,131	60,799	51,529	44,410	40,147	44,647
Industrial DMT Transportation (CTS)	853,076	1,048,823	1,248,603	1,236,992	1,446,623	1,295,704	1,232,064	1,238,327	977,699	914,123	890,900	983,257
Public Authority DMT Transportation (CTS)	6,910	13,946	21,007	22,236	23,739	23,648	20,731	15,780	3,331	7,019	6,644	6,953
Total DMT Service	**908,411**	**1,122,636**	**1,340,496**	**1,330,306**	**1,553,798**	**1,392,336**	**1,322,926**	**1,314,906**	**1,032,559**	**965,552**	**937,691**	**1,034,858**
Residential Transportation Service	55,116	122,731	223,366	278,819	281,607	223,685	199,408	93,182	46,597	32,414	29,471	33,576
Commercial Transportation Service	173,491	309,863	486,320	585,304	660,475	537,231	476,316	298,865	185,424	148,035	135,801	150,837
Industrial Transportation Service	1,081,910	1,339,072	1,598,981	1,578,226	1,840,783	1,644,123	1,555,837	1,460,479	1,166,772	1,086,931	1,058,897	1,159,550
Public Authority Transportation Service	57,470	128,034	224,148	262,292	320,848	262,368	232,093	149,708	66,457	47,907	40,090	45,938
Total Transportation Service	1,367,988	1,899,699	2,532,815	2,704,642	3,103,713	2,667,407	2,463,654	2,002,234	1,465,249	1,315,287	1,264,259	1,389,901
Total Requirements	**1,983,811**	**3,278,925**	**5,054,337**	**5,897,328**	**6,297,821**	**5,191,728**	**4,689,092**	**2,998,328**	**1,969,668**	**1,666,766**	**1,590,318**	**1,768,694**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Actual MCF - Monthly
Historical Test Year (Oct 2024 - Sep 2025)

	Actuals (HTY)											
	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25
Retail Sales												
Residential	465,687	983,020	2,324,604	3,216,315	3,300,387	2,613,795	1,759,473	940,519	536,071	263,129	266,781	353,689
Commercial	84,484	166,947	375,063	561,364	618,183	497,660	322,105	169,600	103,877	64,816	62,590	81,474
Industrial	8,340	14,492	28,586	50,369	53,236	44,103	28,185	15,992	8,883	5,711	6,799	7,393
Public Authority	4,116	10,408	25,214	42,288	41,850	33,457	22,390	10,861	5,914	3,472	2,473	3,100
Subtotal Retail Sales	**562,627**	**1,174,867**	**2,753,467**	**3,870,336**	**4,013,656**	**3,189,016**	**2,132,153**	**1,136,973**	**654,745**	**337,128**	**338,644**	**445,655**
Company Use	**174**	**588**	**1,766**	**2,656**	**2,788**	**2,282**	**1,308**	**655**	**296**	**68**	**44**	**140**
Total Retail Sales	**562,801**	**1,175,455**	**2,755,233**	**3,872,991**	**4,016,444**	**3,191,298**	**2,133,461**	**1,137,627**	**655,041**	**337,196**	**338,688**	**445,795**
Transportation Service												
Residential MMT Transportation	6,046	13,600	26,790	43,140	49,202	39,732	28,952	17,490	10,279	4,820	4,229	5,075
Commercial MMT Transportation	112,160	205,560	363,439	553,497	618,388	507,701	364,756	235,499	147,848	93,719	84,362	103,853
Industrial MMT Transportation	177,978	222,507	263,477	347,159	428,362	369,518	307,364	246,487	199,375	182,324	173,910	194,653
Public Authority MMT Transportation	46,280	108,717	175,166	280,801	348,171	292,347	211,453	146,020	86,908	45,147	38,109	56,103
Total MMT Service	**342,464**	**550,383**	**828,873**	**1,224,597**	**1,444,122**	**1,209,298**	**912,525**	**645,495**	**444,409**	**326,010**	**300,610**	**359,684**
Residential SATC Transportation	45,481	96,463	232,795	325,768	340,026	272,202	183,395	98,046	56,238	27,193	27,541	36,548
Commercial SATC Transportation	9,714	19,153	41,214	60,000	61,561	51,281	31,243	17,343	9,660	6,756	6,040	7,806
Industrial SATC Transportation	59	338	1,189	2,394	2,297	1,833	1,423	668	162	37	33	41
Public Authority SATC Transportation	267	729	1,837	3,008	2,999	2,292	1,421	532	421	249	129	157
Total SATC Service	**55,521**	**116,683**	**277,035**	**391,170**	**406,883**	**327,608**	**217,482**	**116,588**	**66,481**	**34,236**	**33,742**	**44,552**
Residential DMT Transportation (CTS)												
Commercial DMT Transportation (CTS)	47,940	55,211	62,269	75,890	87,971	59,050	70,146	61,514	53,617	45,860	47,215	44,482
Industrial DMT Transportation (CTS)	967,763	1,052,429	1,148,385	1,340,755	1,590,312	1,440,009	1,403,919	1,093,985	970,474	861,230	941,982	913,189
Public Authority DMT Transportation (CTS)	7,039	12,489	18,961	27,053	27,149	26,403	22,450	15,466	662	5,440	6,395	6,415
Total DMT Service	**1,022,742**	**1,120,129**	**1,229,616**	**1,443,699**	**1,705,432**	**1,525,462**	**1,496,515**	**1,170,965**	**1,024,753**	**912,530**	**995,592**	**964,086**
Residential Transportation Service	51,528	110,063	259,586	368,909	389,228	311,933	212,347	115,536	66,517	32,013	31,769	41,623
Commercial Transportation Service	169,814	279,923	466,923	689,387	767,920	618,032	466,146	314,355	211,125	146,335	137,617	156,141
Industrial Transportation Service	1,145,801	1,275,274	1,413,051	1,690,308	2,020,970	1,811,361	1,712,706	1,341,140	1,170,011	1,043,591	1,115,925	1,107,883
Public Authority Transportation Service	53,585	121,934	195,964	310,863	378,320	321,042	235,324	162,017	87,991	50,836	44,633	62,675
Total Transportation Service	1,420,727	1,787,195	2,335,523	3,059,466	3,556,438	3,062,368	2,626,523	1,933,048	1,535,644	1,272,776	1,329,944	1,368,322
Total Requirements	**1,983,528**	**2,962,650**	**5,090,756**	**6,932,457**	**7,572,882**	**6,253,667**	**4,759,984**	**3,070,675**	**2,190,685**	**1,609,972**	**1,668,632**	**1,814,117**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Forecasted MCF - Monthly
Future Test Year (Oct 2025 - Sep 2026)

Shrinkage: 0.15%

	Forecast (FTY)											
	Oct-25	**Nov-25**	**Dec-25**	**Jan-26**	**Feb-26**	**Mar-26**	**Apr-26**	**May-26**	**Jun-26**	**Jul-26**	**Aug-26**	**Sep-26**
Retail Sales												
Residential	551,913	1,279,185	2,348,483	2,991,851	2,976,857	2,589,587	1,961,046	1,223,479	506,109	254,987	225,697	269,132
Commercial	95,608	217,613	396,872	514,308	516,913	448,479	342,032	211,075	91,263	51,522	44,924	54,248
Industrial	7,232	13,563	28,540	38,685	42,742	35,492	26,565	16,065	7,611	6,088	3,668	4,199
Public Authority	4,892	12,243	25,684	33,587	31,898	27,478	20,927	11,842	3,836	1,565	936	1,491
Subtotal Retail Sales	**659,645**	**1,522,603**	**2,799,579**	**3,578,431**	**3,568,410**	**3,101,035**	**2,350,570**	**1,462,462**	**608,818**	**314,162**	**275,225**	**329,070**
Company Use	**237**	**745**	**1,583**	**2,147**	**2,202**	**1,712**	**1,308**	**595**	**163**	**73**	**53**	**85**
Total Retail Sales	**659,882**	**1,523,348**	**2,801,163**	**3,580,578**	**3,570,611**	**3,102,747**	**2,351,878**	**1,463,057**	**608,981**	**314,235**	**275,278**	**329,155**
Retail Sales Shrinkage	**991**	**2,288**	**4,208**	**5,379**	**5,364**	**4,661**	**3,533**	**2,198**	**915**	**472**	**414**	**494**
Total Retail Sales Requirements	**660,873**	**1,525,636**	**2,805,371**	**3,585,957**	**3,575,975**	**3,107,408**	**2,355,411**	**1,465,255**	**609,896**	**314,707**	**275,692**	**329,649**
Transportation Service												
Residential MMT Transportation	7,185	17,526	32,497	44,751	49,119	42,764	35,280	23,375	11,881	5,832	4,830	5,289
Commercial MMT Transportation	118,571	233,122	403,135	531,893	566,846	495,084	406,139	264,133	145,208	91,603	83,040	91,349
Industrial MMT Transportation	213,779	262,221	310,955	349,128	393,590	360,698	338,170	254,616	232,444	213,504	209,931	217,551
Public Authority MMT Transportation	50,087	114,823	203,779	274,276	311,469	276,241	242,541	158,460	83,636	41,151	35,012	36,330
Total MMT Service	**389,622**	**627,693**	**950,365**	**1,200,048**	**1,321,023**	**1,174,787**	**1,022,130**	**700,584**	**473,170**	**352,090**	**332,814**	**350,519**
MMT Service Shrinkage	**585**	942	1,428	1,802	1,985	1,765	1,535	1,052	711	530	500	527
Total MMT Service Requirements	**390,207**	**628,635**	**951,793**	**1,201,850**	**1,323,008**	**1,176,552**	**1,023,665**	**701,636**	**473,881**	**352,620**	**333,314**	**351,046**
Residential SATC Transportation	52,463	118,276	216,001	274,669	271,954	236,937	180,873	114,606	47,372	24,478	21,798	25,688
Commercial SATC Transportation	9,418	22,097	38,037	48,102	46,664	40,266	30,290	18,835	8,294	4,422	3,896	5,019
Industrial SATC Transportation	229	568	1,447	1,939	2,125	1,678	1,292	635	267	125	114	140
Public Authority SATC Transportation	460	1,003	2,118	3,040	3,111	2,675	1,938	884	433	376	103	155
Total SATC Service	**62,570**	**141,943**	**257,603**	**327,750**	**323,854**	**281,557**	**214,393**	**134,961**	**56,365**	**29,401**	**25,911**	**31,002**
SATC Service Shrinkage	**94**	214	386	493	487	423	323	202	84	45	39	47
Total SATC Service Requirements	**62,664**	**142,157**	**257,989**	**328,243**	**324,341**	**281,980**	**214,716**	**135,163**	**56,449**	**29,446**	**25,950**	**31,049**
Residential DMT Transportation (CTS)	0	0	0	0	0	0	0	0	0	0	0	0
Commercial DMT Transportation (CTS)	50,901	65,881	67,309	73,313	81,879	73,457	66,268	54,419	47,325	43,823	43,997	48,110
Industrial DMT Transportation (CTS)	1,032,267	1,108,773	1,235,077	1,384,780	1,514,170	1,417,705	1,387,264	1,165,507	1,054,678	1,017,029	973,405	1,030,617
Public Authority DMT Transportation (CTS)	10,699	20,147	22,056	26,360	25,242	27,343	19,326	14,449	3,770	7,255	15,421	11,095
Total DMT Service	**1,093,867**	**1,194,801**	**1,324,442**	**1,484,453**	**1,621,291**	**1,518,504**	**1,472,858**	**1,234,376**	**1,105,773**	**1,068,107**	**1,032,822**	**1,089,822**
DMT Service Shrinkage	**1,643**	1,795	1,989	2,230	2,436	2,281	2,213	1,855	1,661	1,605	1,551	1,637
Total DMT Service Requirements	**1,095,510**	**1,196,596**	**1,326,431**	**1,486,683**	**1,623,727**	**1,520,785**	**1,475,071**	**1,236,231**	**1,107,434**	**1,069,712**	**1,034,373**	**1,091,459**
Residential Transportation Service	59,648	135,802	248,498	319,420	321,073	279,702	216,154	137,982	59,253	30,310	26,629	30,976
Commercial Transportation Service	178,889	321,100	508,481	653,308	695,389	608,806	502,698	337,387	200,827	139,848	130,933	144,478
Industrial Transportation Service	1,246,275	1,371,562	1,547,479	1,735,847	1,909,885	1,780,080	1,726,726	1,420,759	1,287,389	1,230,658	1,183,450	1,248,308
Public Authority Transportation Service	61,246	135,973	227,953	303,676	339,821	306,259	263,804	173,793	87,839	48,782	50,536	47,580
Total Transportation Service	1,546,058	1,964,437	2,532,410	3,012,252	3,266,168	2,974,848	2,709,381	2,069,920	1,635,309	1,449,599	1,391,547	1,471,343
Total Transportation Shrinkage	2,322	2,951	3,803	4,525	4,908	4,469	4,071	3,109	2,456	2,180	2,090	2,211
Total Transportation Requirements	**1,548,380**	**1,967,388**	**2,536,213**	**3,016,777**	**3,271,076**	**2,979,317**	**2,713,452**	**2,073,029**	**1,637,765**	**1,451,779**	**1,393,637**	**1,473,554**
Total Requirements	**2,209,253**	**3,493,024**	**5,341,584**	**6,602,734**	**6,847,051**	**6,086,725**	**5,068,863**	**3,538,284**	**2,247,661**	**1,766,485**	**1,669,329**	**1,803,203**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Forecasted MCF - Monthly
Fully Projected Future Test Year (Nov 2026 - Oct 2027)

Shrinkage: 0.15%

	Forecast (FPFTY)											
	Nov-26	**Dec-26**	**Jan-27**	**Feb-27**	**Mar-27**	**Apr-27**	**May-27**	**Jun-27**	**Jul-27**	**Aug-27**	**Sep-27**	**Oct-27**
Retail Sales												
Residential	1,283,898	2,355,917	3,000,230	2,985,135	2,597,119	1,967,444	1,228,626	510,008	258,383	229,031	272,568	561,049
Commercial	219,850	400,652	519,115	521,683	452,901	345,420	213,191	92,175	51,942	45,297	54,694	97,473
Industrial	13,241	27,931	37,897	42,516	35,248	25,942	15,658	7,510	5,916	3,556	4,082	6,837
Public Authority	10,980	22,980	30,485	28,818	24,467	18,596	10,437	3,368	1,331	756	1,269	3,803
Subtotal Retail Sales	**1,527,968**	**2,807,480**	**3,587,727**	**3,578,151**	**3,109,735**	**2,357,403**	**1,467,912**	**613,061**	**317,571**	**278,641**	**332,613**	**669,162**
Company Use	**745**	**1,583**	**2,147**	**2,202**	**1,712**	**1,308**	**595**	**163**	**73**	**53**	**85**	**237**
Total Retail Sales	**1,528,713**	**2,809,064**	**3,589,874**	**3,580,353**	**3,111,447**	**2,358,710**	**1,468,508**	**613,224**	**317,644**	**278,694**	**332,698**	**669,400**
Retail Sales Shrinkage	**2,297**	**4,220**	**5,393**	**5,379**	**4,674**	**3,543**	**2,206**	**921**	**477**	**419**	**500**	**1,006**
Total Retail Sales Requirements	**1,531,010**	**2,813,284**	**3,595,267**	**3,585,732**	**3,116,121**	**2,362,253**	**1,470,714**	**614,145**	**318,121**	**279,113**	**333,198**	**670,406**
Transportation Service												
Residential MMT Transportation	17,967	32,647	44,928	49,297	42,927	35,419	23,485	11,963	5,896	4,893	5,372	7,475
Commercial MMT Transportation	235,273	407,125	537,169	572,249	499,704	409,582	266,191	146,117	92,110	83,474	91,979	120,456
Industrial MMT Transportation	264,905	312,289	350,193	394,794	361,723	339,226	254,934	233,489	214,058	210,316	217,742	219,217
Public Authority MMT Transportation	115,255	204,748	275,659	312,608	277,290	243,077	158,671	83,588	41,065	34,925	36,282	50,325
Total MMT Service	**633,401**	**956,809**	**1,207,948**	**1,328,949**	**1,181,644**	**1,027,305**	**703,281**	**475,157**	**353,129**	**333,608**	**351,376**	**397,473**
MMT Service Shrinkage	**951**	1,438	1,814	1,997	1,775	1,543	1,056	715	531	500	528	597
Total MMT Service Requirements	**634,352**	**958,247**	**1,209,762**	**1,330,946**	**1,183,419**	**1,028,848**	**704,337**	**475,872**	**353,660**	**334,108**	**351,904**	**398,070**
Residential SATC Transportation	118,711	216,685	275,438	272,711	237,626	181,463	115,089	47,737	24,804	22,120	26,016	53,332
Commercial SATC Transportation	20,511	35,116	44,408	42,974	37,064	27,870	17,334	7,692	4,144	3,646	4,714	8,041
Industrial SATC Transportation	568	1,447	1,939	2,125	1,678	1,292	635	267	125	114	140	229
Public Authority SATC Transportation	1,003	2,118	3,040	3,111	2,675	1,938	884	433	376	103	155	460
Total SATC Service	**140,793**	**255,366**	**324,826**	**320,920**	**279,044**	**212,563**	**133,942**	**56,129**	**29,449**	**25,983**	**31,026**	**62,062**
SATC Service Shrinkage	**212**	384	489	483	420	320	201	85	44	38	46	93
Total SATC Service Requirements	**141,005**	**255,750**	**325,315**	**321,403**	**279,464**	**212,883**	**134,143**	**56,214**	**29,493**	**26,021**	**31,072**	**62,155**
Residential DMT Transportation (CTS)	0	0	0	0	0	0	0	0	0	0	0	0
Commercial DMT Transportation (CTS)	65,881	67,309	73,313	81,879	73,457	66,268	54,419	47,325	43,823	43,997	48,110	50,901
Industrial DMT Transportation (CTS)	1,111,346	1,240,852	1,450,257	1,591,630	1,486,505	1,455,520	1,221,563	1,092,805	1,055,781	1,011,643	1,073,610	1,068,261
Public Authority DMT Transportation (CTS)	20,147	22,056	26,360	25,242	27,343	19,326	14,449	3,770	7,255	15,421	11,095	10,699
Total DMT Service	**1,197,373**	**1,330,216**	**1,549,931**	**1,698,751**	**1,587,304**	**1,541,114**	**1,290,431**	**1,143,900**	**1,106,860**	**1,071,060**	**1,132,815**	**1,129,861**
DMT Service Shrinkage	**1,799**	1,998	2,329	2,552	2,384	2,316	1,939	1,719	1,663	1,609	1,702	1,697
Total DMT Service Requirements	**1,199,172**	**1,332,214**	**1,552,260**	**1,701,303**	**1,589,688**	**1,543,430**	**1,292,370**	**1,145,619**	**1,108,523**	**1,072,669**	**1,134,517**	**1,131,558**
Residential Transportation Service	136,679	249,332	320,366	322,008	280,554	216,883	138,573	59,701	30,701	27,013	31,388	60,807
Commercial Transportation Service	321,665	509,550	654,890	697,102	610,225	503,721	337,944	201,133	140,077	131,116	144,803	179,398
Industrial Transportation Service	1,376,819	1,554,588	1,802,389	1,988,549	1,849,906	1,796,038	1,477,132	1,326,561	1,269,964	1,222,073	1,291,493	1,287,707
Public Authority Transportation Service	136,405	228,922	305,059	340,960	307,308	264,340	174,004	87,791	48,696	50,449	47,532	61,484
Total Transportation Service	1,971,568	2,542,391	3,082,705	3,348,620	3,047,992	2,780,982	2,127,653	1,675,185	1,489,438	1,430,651	1,515,216	1,589,396
Total Transportation Shrinkage	2,962	3,820	4,632	5,032	4,579	4,179	3,196	2,519	2,238	2,147	2,276	2,387
Total Transportation Requirements	**1,974,530**	**2,546,211**	**3,087,337**	**3,353,652**	**3,052,571**	**2,785,161**	**2,130,849**	**1,677,704**	**1,491,676**	**1,432,798**	**1,517,492**	**1,591,783**
Total Requirements	**3,505,540**	**5,359,495**	**6,682,604**	**6,939,384**	**6,168,692**	**5,147,414**	**3,601,563**	**2,291,849**	**1,809,797**	**1,711,911**	**1,850,690**	**2,262,188**

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-H-Operating Revenues
Delivered on January 28, 2026

III-H.7

Request:

Provide growth patterns of usage and customer numbers by customer class, using historical and projected data.

Response:

Please see Attachment III-H.7.

Prepared by or under the supervision of: Cathryn E. Hilliard

National Fuel Gas Distribution Corporation
Pennsylvania Division
Customer Numbers Trends

	Number of Accounts by Fiscal Year (October - September)											
FY:	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Start	Oct-18	Oct-19	Oct-20	Oct-21	Oct-22	Oct-23	Oct-24	Oct-25	Oct-26	Oct-27	Oct-28	Oct-29
Stop	Sep-19	Sep-20	Sep-21	Sep-22	Sep-23	Sep-24	Sep-25	Sep-26	Sep-27	Sep-28	Sep-29	Sep-30
Retail Sales												
Residential	170,612	172,703	178,220	179,173	179,425	179,859	177,998	180,434	180,734	181,034	181,335	181,635
Commercial	10,571	10,654	10,772	10,969	11,049	11,028	11,194	11,245	11,345	11,446	11,545	11,646
Industrial	168	175	173	178	177	177	185	182	183	183	184	184
Public Authority	611	629	642	648	618	580	597	535	502	470	437	404
Subtotal Retail Sales	**181,962**	**184,161**	**189,807**	**190,967**	**191,270**	**191,644**	**189,973**	**192,396**	**192,764**	**193,133**	**193,501**	**193,869**
Company Use	0	0	0	0	0	0	0	0	0	0	0	0
Total Retail Sales	**181,962**	**184,161**	**189,807**	**190,967**	**191,270**	**191,644**	**189,973**	**192,396**	**192,764**	**193,133**	**193,501**	**193,869**
Transportation Service												
Residential MMT Transportation	337	342	332	361	406	522	561	542	544	546	549	551
Commercial MMT Transportation	2,460	2,562	2,670	2,682	2,703	2,793	2,762	2,911	2,995	3,080	3,162	3,246
Industrial MMT Transportation	341	340	339	338	338	339	336	341	343	344	346	347
Public Authority MMT Transportation	452	475	488	490	517	559	567	626	663	701	738	775
Total MMT Service	**3,590**	**3,719**	**3,829**	**3,870**	**3,964**	**4,212**	**4,225**	**4,420**	**4,545**	**4,671**	**4,795**	**4,919**
Residential SATC Transportation	24,533	23,370	18,359	17,410	16,859	16,477	18,052	16,529	16,557	16,584	16,612	16,639
Commercial SATC Transportation	1,756	1,579	1,417	1,293	1,220	1,159	1,051	969	877	787	695	603
Industrial SATC Transportation	22	21	20	18	19	16	14	14	14	14	14	14
Public Authority SATC Transportation	61	64	61	64	59	56	40	44	44	44	44	44
Total SATC Service	**26,372**	**25,034**	**19,857**	**18,785**	**18,157**	**17,707**	**19,157**	**17,556**	**17,492**	**17,429**	**17,365**	**17,300**
Residential DMT Transportation (CTS)	0	0	0	0	0	0	0	0	0	0	0	0
Commercial DMT Transportation (CTS)	14	13	13	12	13	13	11	11	11	11	11	11
Industrial DMT Transportation (CTS)	63	63	62	61	61	63	64	62	62	62	62	62
Public Authority DMT Transportation (CTS)	2	2	2	2	2	2	2	3	3	3	3	3
Total DMT Service	**79**	**79**	**77**	**76**	**75**	**78**	**78**	**76**	**76**	**76**	**76**	**76**
Residential Transportation Service	24,870	23,712	18,691	17,771	17,266	16,999	18,614	17,071	17,101	17,130	17,161	17,190
Commercial Transportation Service	4,230	4,155	4,100	3,987	3,936	3,965	3,824	3,891	3,883	3,878	3,868	3,860
Industrial Transportation Service	426	424	421	417	418	417	414	417	419	420	422	423
Public Authority Transportation Service	515	540	551	556	578	616	608	673	710	748	785	822
Total Transportation	**30,042**	**28,831**	**23,763**	**22,731**	**22,196**	**21,997**	**23,459**	**22,052**	**22,113**	**22,176**	**22,236**	**22,295**
Total	**212,004**	**212,992**	**213,570**	**213,698**	**213,466**	**213,641**	**213,433**	**214,448**	**214,877**	**215,309**	**215,737**	**216,164**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Customer Numbers Trends

	Percent Year-over-Year Change in Number of Accounts by Fiscal Year (October - September)										
FY:	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Start	Oct-19	Oct-20	Oct-21	Oct-22	Oct-23	Oct-24	Oct-25	Oct-26	Oct-27	Oct-28	Oct-29
Stop	Sep-20	Sep-21	Sep-22	Sep-23	Sep-24	Sep-25	Sep-26	Sep-27	Sep-28	Sep-29	Sep-30
Retail Sales											
Residential	1.2%	3.2%	0.5%	0.1%	0.2%	-1.0%	1.4%	0.2%	0.2%	0.2%	0.2%
Commercial	0.8%	1.1%	1.8%	0.7%	-0.2%	1.5%	0.5%	0.9%	0.9%	0.9%	0.9%
Industrial	4.5%	-1.1%	2.7%	-0.2%	0.0%	4.0%	-1.4%	0.5%	0.0%	0.5%	0.0%
Public Authority	2.9%	2.0%	1.0%	-4.6%	-6.3%	2.9%	-10.3%	-6.2%	-6.4%	-7.0%	-7.6%
Subtotal Retail Sales	**1.2%**	**3.1%**	**0.6%**	**0.2%**	**0.2%**	**-0.9%**	**1.3%**	**0.2%**	**0.2%**	**0.2%**	**0.2%**
Company Use	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total Retail Sales	**1.2%**	**3.1%**	**0.6%**	**0.2%**	**0.2%**	**-0.9%**	**1.3%**	**0.2%**	**0.2%**	**0.2%**	**0.2%**
Transportation Service											
Residential MMT Transportation	1.5%	-3.0%	8.7%	12.6%	28.6%	7.5%	-3.5%	0.4%	0.4%	0.5%	0.4%
Commercial MMT Transportation	4.2%	4.2%	0.4%	0.8%	3.3%	-1.1%	5.4%	2.9%	2.8%	2.7%	2.7%
Industrial MMT Transportation	-0.5%	-0.1%	-0.4%	0.1%	0.2%	-0.9%	1.6%	0.6%	0.3%	0.6%	0.3%
Public Authority MMT Transportation	5.1%	2.8%	0.4%	5.4%	8.1%	1.4%	10.5%	5.9%	5.7%	5.3%	5.0%
Total MMT Service	**3.6%**	**3.0%**	**1.1%**	**2.4%**	**6.3%**	**0.3%**	**4.6%**	**2.8%**	**2.8%**	**2.7%**	**2.6%**
Residential SATC Transportation	-4.7%	-21.4%	-5.2%	-3.2%	-2.3%	9.6%	-8.4%	0.2%	0.2%	0.2%	0.2%
Commercial SATC Transportation	-10.1%	-10.3%	-8.7%	-5.7%	-5.0%	-9.4%	-7.8%	-9.5%	-10.3%	-11.7%	-13.2%
Industrial SATC Transportation	-1.9%	-5.9%	-7.6%	2.7%	-16.8%	-9.6%	-1.2%	0.0%	0.0%	0.0%	0.0%
Public Authority SATC Transportation	4.4%	-3.7%	4.4%	-7.7%	-5.6%	-28.6%	10.7%	0.0%	0.0%	0.0%	0.0%
Total SATC Service	**-5.1%**	**-20.7%**	**-5.4%**	**-3.3%**	**-2.5%**	**8.2%**	**-8.4%**	**-0.4%**	**-0.4%**	**-0.4%**	**-0.4%**
Residential DMT Transportation (CTS)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Commercial DMT Transportation (CTS)	-4.2%	-3.1%	-5.1%	2.0%	2.0%	-11.7%	-2.9%	0.0%	0.0%	0.0%	0.0%
Industrial DMT Transportation (CTS)	-0.5%	-1.3%	-1.7%	-1.0%	3.6%	2.5%	-3.6%	0.0%	0.0%	0.0%	0.0%
Public Authority DMT Transportation (CTS)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	50.0%	0.0%	0.0%	0.0%	0.0%
Total DMT Service	**-1.2%**	**-1.6%**	**-2.3%**	**-0.4%**	**3.2%**	**0.1%**	**-2.1%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**
Residential Transportation Service	-4.7%	-21.2%	-4.9%	-2.8%	-1.5%	9.5%	-8.3%	0.2%	0.2%	0.2%	0.2%
Commercial Transportation Service	-1.8%	-1.3%	-2.8%	-1.3%	0.7%	-3.6%	1.8%	-0.2%	-0.1%	-0.3%	-0.2%
Industrial Transportation Service	-0.6%	-0.6%	-0.9%	0.1%	-0.1%	-0.7%	0.7%	0.5%	0.2%	0.5%	0.2%
Public Authority Transportation Service	5.0%	2.0%	0.9%	3.9%	6.7%	-1.3%	10.6%	5.5%	5.4%	4.9%	4.7%
Total Transportation	**-4.0%**	**-17.6%**	**-4.3%**	**-2.4%**	**-0.9%**	**6.6%**	**-6.0%**	**0.3%**	**0.3%**	**0.3%**	**0.3%**
Total	**0.5%**	**0.3%**	**0.1%**	**-0.1%**	**0.1%**	**-0.1%**	**0.5%**	**0.2%**	**0.2%**	**0.2%**	**0.2%**

National Fuel Gas Distribution Corporation
Pennsylvania Division
MCF Trends

Shrinkage: 0.15%

	Usage (MCF) by Fiscal Year (October - September)											
FY:	**2019**	**2020**	**2021**	**2022**	**2023**	**2024**	**2025**	**2026**	**2027**	**2028**	**2029**	**2030**
Start	**Oct-18**	**Oct-19**	**Oct-20**	**Oct-21**	**Oct-22**	**Oct-23**	**Oct-24**	**Oct-25**	**Oct-26**	**Oct-27**	**Oct-28**	**Oct-29**
Stop	**Sep-19**	**Sep-20**	**Sep-21**	**Sep-22**	**Sep-23**	**Sep-24**	**Sep-25**	**Sep-26**	**Sep-27**	**Sep-28**	**Sep-29**	**Sep-30**
Retail Sales												
Residential	17,267,182	16,177,932	16,678,688	17,136,647	16,510,822	15,188,987	17,023,470	17,178,326	17,245,446	17,432,149	17,402,703	17,461,721
Commercial	3,094,508	2,776,224	2,768,970	2,932,501	2,866,071	2,630,465	3,108,164	2,984,857	3,013,423	3,060,221	3,071,021	3,099,619
Industrial	221,206	220,770	232,644	300,327	250,107	207,133	272,089	230,450	226,532	223,703	217,715	213,740
Public Authority	213,247	212,746	233,582	217,842	211,205	172,481	205,543	176,378	157,815	141,909	123,569	105,513
Subtotal Retail Sales	**20,796,143**	**19,387,672**	**19,913,885**	**20,587,317**	**19,838,205**	**18,199,066**	**20,609,266**	**20,570,010**	**20,643,216**	**20,857,982**	**20,815,009**	**20,880,592**
Company Use	14,877	13,593	13,361	14,164	12,268	10,903	12,765	10,903	10,903	10,977	10,903	10,903
Total Retail Sales	**20,811,020**	**19,401,265**	**19,927,246**	**20,601,481**	**19,850,474**	**18,209,969**	**20,622,031**	**20,580,914**	**20,654,120**	**20,868,959**	**20,825,913**	**20,891,496**
Transportation Service												
Residential MMT Transportation	244,396	235,202	230,778	230,787	231,131	218,545	249,355	280,330	282,191	286,915	290,056	292,117
Commercial MMT Transportation	3,634,737	3,256,099	3,341,576	3,358,915	3,292,896	3,129,321	3,390,782	3,430,122	3,460,488	3,511,652	3,523,173	3,554,335
Industrial MMT Transportation	3,777,428	3,277,652	3,182,664	3,335,679	3,346,917	3,191,320	3,113,114	3,356,588	3,371,537	3,374,465	3,333,430	3,322,611
Public Authority MMT Transportation	1,840,016	1,817,673	1,729,676	1,911,945	1,848,236	1,650,539	1,835,221	1,827,805	1,833,377	1,849,879	1,844,208	1,849,592
Total MMT Service	**9,496,577**	**8,586,625**	**8,484,694**	**8,837,325**	**8,719,179**	**8,189,725**	**8,588,472**	**8,894,845**	**8,947,593**	**9,022,911**	**8,990,867**	**9,018,654**
Residential SATC Transportation	2,588,485	2,344,181	1,788,939	1,708,001	1,594,993	1,401,426	1,741,697	1,585,116	1,591,357	1,608,578	1,605,991	1,611,475
Commercial SATC Transportation	450,949	368,230	322,202	309,077	309,668	300,301	321,770	275,340	254,224	234,551	212,331	191,046
Industrial SATC Transportation	17,681	13,747	10,671	11,166	14,786	14,049	10,474	10,558	10,558	10,633	10,558	10,558
Public Authority SATC Transportation	19,276	16,934	15,626	15,811	14,542	14,873	14,040	16,296	16,296	16,405	16,296	16,296
Total SATC Service	**3,076,391**	**2,743,092**	**2,137,438**	**2,044,056**	**1,933,990**	**1,730,649**	**2,087,980**	**1,887,311**	**1,872,436**	**1,870,166**	**1,845,177**	**1,829,375**
Residential DMT Transportation (CTS)	0	0	0	0	0	0	0	0	0	0	0	0
Commercial DMT Transportation (CTS)	690,556	693,105	708,145	684,155	667,670	718,340	711,166	716,683	716,683	716,683	716,683	716,683
Industrial DMT Transportation (CTS)	15,339,154	13,537,215	13,733,198	14,104,276	12,406,735	13,366,191	13,724,432	14,321,271	14,825,711	14,983,029	14,932,474	14,933,552
Public Authority DMT Transportation (CTS)	208,280	210,763	205,402	198,423	192,265	171,943	175,923	203,162	203,162	204,073	203,162	203,162
Total DMT Service	**16,237,991**	**14,441,083**	**14,646,746**	**14,986,854**	**13,266,670**	**14,256,473**	**14,611,521**	**15,241,116**	**15,745,555**	**15,903,785**	**15,852,319**	**15,853,396**
Residential Transportation Service	2,832,881	2,579,383	2,019,717	1,938,788	1,826,123	1,619,971	1,991,051	1,865,447	1,873,549	1,895,492	1,896,047	1,903,592
Commercial Transportation Service	4,776,242	4,317,434	4,371,923	4,352,147	4,270,234	4,147,961	4,423,718	4,422,145	4,431,395	4,462,885	4,452,187	4,462,063
Industrial Transportation Service	19,134,263	16,828,614	16,926,533	17,451,122	15,768,438	16,571,560	16,848,020	17,688,417	18,207,806	18,368,126	18,276,462	18,266,721
Public Authority Transportation Service	2,067,572	2,045,369	1,950,704	2,126,179	2,055,043	1,837,355	2,025,184	2,047,263	2,052,834	2,070,358	2,063,666	2,069,050
Total Transportation Service	**28,810,959**	**25,770,800**	**25,268,877**	**25,868,235**	**23,919,838**	**24,176,848**	**25,287,973**	**26,023,272**	**26,565,584**	**26,796,862**	**26,688,362**	**26,701,426**
Total Requirements	**49,621,979**	**45,172,065**	**45,196,123**	**46,469,716**	**43,770,312**	**42,386,817**	**45,910,003**	**46,604,186**	**47,219,703**	**47,665,821**	**47,514,275**	**47,592,922**

National Fuel Gas Distribution Corporation
Pennsylvania Division
MCF Trends

	Percent Year-over-Year change in Usage (MCF) by Fiscal Year (October - September)										
FY:	**2020**	**2021**	**2022**	**2023**	**2024**	**2025**	**2026**	**2027**	**2028**	**2029**	**2030**
Start	**Oct-19**	**Oct-20**	**Oct-21**	**Oct-22**	**Oct-23**	**Oct-24**	**Oct-25**	**Oct-26**	**Oct-27**	**Oct-28**	**Oct-29**
Stop	**Sep-20**	**Sep-21**	**Sep-22**	**Sep-23**	**Sep-24**	**Sep-25**	**Sep-26**	**Sep-27**	**Sep-28**	**Sep-29**	**Sep-30**
Retail Sales											
Residential	-6.3%	3.1%	2.7%	-3.7%	-8.0%	12.1%	0.9%	0.4%	1.1%	-0.2%	0.3%
Commercial	-10.3%	-0.3%	5.9%	-2.3%	-8.2%	18.2%	-4.0%	1.0%	1.6%	0.4%	0.9%
Industrial	-0.2%	5.4%	29.1%	-16.7%	-17.2%	31.4%	-15.3%	-1.7%	-1.2%	-2.7%	-1.8%
Public Authority	-0.2%	9.8%	-6.7%	-3.0%	-18.3%	19.2%	-14.2%	-10.5%	-10.1%	-12.9%	-14.6%
Subtotal Retail Sales	**-6.8%**	**2.7%**	**3.4%**	**-3.6%**	**-8.3%**	**13.2%**	**-0.2%**	**0.4%**	**1.0%**	**-0.2%**	**0.3%**
Company Use	-8.6%	-1.7%	6.0%	-13.4%	-11.1%	17.1%	-14.6%	0.0%	0.7%	-0.7%	0.0%
Total Retail Sales	**-6.8%**	**2.7%**	**3.4%**	**-3.6%**	**-8.3%**	**13.2%**	**-0.2%**	**0.4%**	**1.0%**	**-0.2%**	**0.3%**
Transportation Service											
Residential MMT Transportation	-3.8%	-1.9%	0.0%	0.1%	-5.4%	14.1%	12.4%	0.7%	1.7%	1.1%	0.7%
Commercial MMT Transportation	-10.4%	2.6%	0.5%	-2.0%	-5.0%	8.4%	1.2%	0.9%	1.5%	0.3%	0.9%
Industrial MMT Transportation	-13.2%	-2.9%	4.8%	0.3%	-4.6%	-2.5%	7.8%	0.4%	0.1%	-1.2%	-0.3%
Public Authority MMT Transportation	-1.2%	-4.8%	10.5%	-3.3%	-10.7%	11.2%	-0.4%	0.3%	0.9%	-0.3%	0.3%
Total MMT Service	**-9.6%**	**-1.2%**	**4.2%**	**-1.3%**	**-6.1%**	**4.9%**	**3.6%**	**0.6%**	**0.8%**	**-0.4%**	**0.3%**
Residential SATC Transportation	-9.4%	-23.7%	-4.5%	-6.6%	-12.1%	24.3%	-9.0%	0.4%	1.1%	-0.2%	0.3%
Commercial SATC Transportation	-18.3%	-12.5%	-4.1%	0.2%	-3.0%	7.1%	-14.4%	-7.7%	-7.7%	-9.5%	-10.0%
Industrial SATC Transportation	-22.2%	-22.4%	4.6%	32.4%	-5.0%	-25.4%	0.8%	0.0%	0.7%	-0.7%	0.0%
Public Authority SATC Transportation	-12.1%	-7.7%	1.2%	-8.0%	2.3%	-5.6%	16.1%	0.0%	0.7%	-0.7%	0.0%
Total SATC Service	**-10.8%**	**-22.1%**	**-4.4%**	**-5.4%**	**-10.5%**	**20.6%**	**-9.6%**	**-0.8%**	**-0.1%**	**-1.3%**	**-0.9%**
	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**
Residential DMT Transportation (CTS)	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Commercial DMT Transportation (CTS)	0.4%	2.2%	-3.4%	-2.4%	7.6%	-1.0%	0.8%	0.0%	0.0%	0.0%	0.0%
Industrial DMT Transportation (CTS)	-11.7%	1.4%	2.7%	-12.0%	7.7%	2.7%	4.3%	3.5%	1.1%	-0.3%	0.0%
Public Authority DMT Transportation (CTS)	1.2%	-2.5%	-3.4%	-3.1%	-10.6%	2.3%	15.5%	0.0%	0.4%	-0.4%	0.0%
Total DMT Service	**-11.1%**	**1.4%**	**2.3%**	**-11.5%**	**7.5%**	**2.5%**	**4.3%**	**3.3%**	**1.0%**	**-0.3%**	**0.0%**
Residential Transportation Service	-8.9%	-21.7%	-4.0%	-5.8%	-11.3%	22.9%	-6.3%	0.4%	1.2%	0.0%	0.4%
Commercial Transportation Service	-9.6%	1.3%	-0.5%	-1.9%	-2.9%	6.6%	0.0%	0.2%	0.7%	-0.2%	0.2%
Industrial Transportation Service	-12.0%	0.6%	3.1%	-9.6%	5.1%	1.7%	5.0%	2.9%	0.9%	-0.5%	-0.1%
Public Authority Transportation Service	-1.1%	-4.6%	9.0%	-3.3%	-10.6%	10.2%	1.1%	0.3%	0.9%	-0.3%	0.3%
Total Transportation Service	**-10.6%**	**-1.9%**	**2.4%**	**-7.5%**	**1.1%**	**4.6%**	**2.9%**	**2.1%**	**0.9%**	**-0.4%**	**0.0%**
Total Requirements	**-9.0%**	**0.1%**	**2.8%**	**-5.8%**	**-3.2%**	**8.3%**	**1.5%**	**1.3%**	**0.9%**	**-0.3%**	**0.2%**

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III-H.8

Request:

If the public utility is affiliated with another public utility within a consolidated group, explain the effects, if any, upon allocation factors used in the current base rate case or in any recent rate increases allowed to the other public utility segment (or segments) of the consolidated group.

Response:

The National Fuel Gas Distribution Corporation (National Fuel) does not have another segment, such as water or electric segment. However, National Fuel does have a New York Division jurisdictional segment (NYD) that is part of National Fuel. Please refer to the Direct Testimony of James Welch, Statement No. 11 for more detail regarding Capital Structure and to the Direct Testimony of Michael J. Maggioli, Statement No. 7 regarding historic balance sheet as the limited areas where NYD affects any of the allocations utilized in this current base rate case.

Prepared by or under the supervision of: Donald N. Koch

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III-H.9

Request:

If the public utility has a curtailment rate in its current or proposed tariff, provide supporting data detailing curtailment adjustments, procedures and policies.

Response:

There is no specific monetary curtailment rate charge detailed in the Company's tariff. Curtailments are enforced administratively via Rule 26 and Operational Flow Orders (OFOs), specified in the Company's respective tariff and Gas Transportation Operating Procedures.

Prepared by or under the supervision of: Christopher A. Cej

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III-H.10

Request:

Provide details of the public utility's attempts, since the immediately preceding rate case filing, to recover uncollectible and delinquent accounts.

Response:

ACTIVE DELINQUENT RESIDENTIAL COLLECTIONS

Residential collection activity in Pennsylvania is governed by Title 52 Pennsylvania Code Chapter 56, Chapter 14, and other guidelines and/or directives issued by the Bureau of Consumer Services.

1. The net amount billed becomes due for all residential accounts no less than twenty (20) days after the mailing of the monthly bill. Industrial, commercial and public authority accounts are due no less than fifteen (15) days after the mailing of the monthly bill.
2. Approximately thirty-one (31) days following the mailing of the monthly bill, residential accounts considered "sufficiently delinquent" are mailed a final termination notice.

   A formula is used to determine those accounts which are "sufficiently delinquent." Among other things, the formula considers the following:
   a. the amount of the arrears
   b. any energy assistance pledges
   c. any credit in the balanced billing plan associated with the prior balance

3. The final termination notice states that service will be terminated no less than (10) days from the date of mailing unless one of the following occurs:
   a. A payment is received
   b. A satisfactory payment arrangement is made
   c. A billing dispute is filed with National Fuel Gas Distribution Corporation ("Company") or the Pennsylvania Public Utility Commission; or
   d. A certified medical emergency exists

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4. The Company must review with the customer certain items prior to discussing payment agreements.

   When a customer contacts the Company before termination, we must first explain:

   56.97(a)(1) The reasons for the proposed termination.

   56.97(a)(2) All available methods for avoiding a termination, including:

   i. Tendering payment in full or otherwise eliminating the grounds for termination

   ii. Entering a payment arrangement.

   iii. Paying what is past due on the most recent previous company negotiated or Commission payment arrangement.

   56.97(a)(3) Information about the universal service programs, including customer assistance program. Refer customer to the program to determine eligibility and to apply for enrollment.

   56.97(a)(4) The medical emergency procedures.

   After explaining the above, the Company may negotiate a payment arrangement. If the Company and the customer are not successful in negotiating an agreement, then 56.97(b)(1)(2) and (3) would be provided when appropriate.

   56.97(b)(1) The right of the customer to file a dispute with the utility and, thereafter, an informal complaint with the Commission.

   56.97(b)(2) The procedures for resolving disputes and informal complaints, including the address and telephone number of the Commission.

   56.97(b)(3) The duty of the customer to pay any portion of a bill which the customer does not dispute.

5. For those customers who have not taken steps to avoid termination, the Company "shall attempt to contact the customer or occupant, to provide notice of the proposed termination at least three days prior to the scheduled termination, using one or more of the following methods" [1406 (b)(1)(ii)]

   a. in person;

   b. by telephone. Phone contact shall be deemed complete upon attempted calls on two separate days to the residence between the hours of 8 a.m. and 9 p.m. if the calls were made at various times each day; or

   c. by e-mail, text message or other electronic messaging format consistent with the commission's privacy guidelines and approved by commission order.

   d. In the case of electronic notification only, the customer must affirmatively consent to be contacted using a specific electronic messaging format for purpose

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of termination.

6. On the proposed termination date, the serviceperson will: (1) accept payment of arrears or a specified amount, leaving service on; or (2) determine a medical emergency exists, leaving service on; or (3) see a receipt, leaving service on; or (4) terminate service. "During the months of December through March, unless personal contact has been made with the customer or responsible adult by personally visiting the customer's residence, the public utility shall, 48 hours of the scheduled date of termination, post a notice of the proposed termination at the service location." [1406(b)(1)(iii)]
7. For Winter Termination 1406(e)(1) severely restricts service terminations for customers with household incomes at or below 250% of the Federal Poverty Level.
8. Per 56.100(h), a survey of terminated accounts is conducted for premises where heat related service has been terminated within the past year for any of the grounds in 56.81 (relating to authorized termination of service). The survey is completed by December 1 and results reported to the Bureau of Consumer Services on or before December 15 of each year. On February 1 of each year, updated survey results are reported to the Bureau of Consumer Services reflecting any change in the status of the accounts subsequent to the December 15 filing, including any accounts terminated in December. A recent copy of the letter from the Bureau of Consumer Services and survey dated August 15, 2025, are part of the exhibit at pages 5 to 7.

FINAL BILL COLLECTIONS

Below is a description of the final bill placement process:

1. Approximately twenty-two (22) days after posting of the final statement, the net bill becomes due.
2. Approximately forty-seven (47) days after posting or twenty-five (25) days past due, the final bill is outsourced to a primary collection agency. The primary collection agency attempts telephone contact, mails additional past due notices and performs skip tracing where applicable. Past due accounts are credit reported at the time the debt is submitted to a primary collection agency.
3. Approximately four-hundred-twelve (412) days after posting of the final statement or three-hundred-ninety (390) days past due, the final bill is returned to National Fuel Gas Distribution Corporation from the primary collection agency.
4. Approximately four-hundred-fifteen (415) days after posting of the final statement or three-hundred-ninety-three (393) days past due, the final bill is referred to a secondary collection agency. Additional telephone contact is attempted by the agency, notices are mailed and skip tracing occurs. The debtors are also credit reported.

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5. Approximately seven-hundred-eighty (780) days after posting of the final statement or seven-hundred-fifty-eight (758) days past due, the secondary placement is returned to National Fuel Gas Distribution Corporation from the secondary collection agency.
6. Approximately seven hundred-eighty-three (783) days after mailing of the final statement or seven-hundred-sixty-one (761) days past due, the final bill is referred to a tertiary collection agency. Additional telephone contact is attempted, notices are mailed and skip tracing occurs. Once again, the debtors are credit reported.
7. Approximately one-thousand-one-hundred-forty-eight (1,148) days after posting or one-thousand-one-hundred-twenty-six (1,126) days past due, the account is returned to National Fuel Gas Distribution Corporation. The account is no longer actively pursued by the collection agency but remains assigned to the agency for warehousing purposes.

UNCOLLECTIBLE ACCOUNTS

Unpaid finals are determined to be uncollectible and are written off to Bad Debt approximately ninety (90) days after the mailing of the final statement or sixty-seven (67) days past due. As indicated above final bill collection activity may continue up to two (2) years after write-off, for a total of three (3) years.

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COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET
HARRISBURG, PENNSYLVANIA 17120

August 15, 2025

Dear Utility Company Executive:

In accordance with 52 Pa. Code § 56.100(h) and § 56.100(i), all utilities subject to this Chapter are required to conduct the Cold Weather Survey (CWS) for premises where heat-related services, including any landlord-ratepayer accounts, have been terminated during the year. Utilities are reminded that all heating accounts terminated in accordance with the regulations at § 56.81 (relating to authorized termination of service) or § 56.98 (relating to termination for unauthorized use, fraud, tampering, or tariff violations) must be included in the survey results – including those terminated for failure to permit access to meters.

The regulations require utilities to survey, within 90 days prior to December 1, and attempt to make post-termination personal contact with an occupant or responsible adult at the premises. Utilities must make a good faith attempt to reach an agreement regarding payment of any arrearages and restoration of service. To ensure personal contact is made prior to December 1, the Bureau of Consumer Services (BCS) recommends beginning to survey off accounts starting September 1, 2025.

The primary goal of this survey is to afford occupants at the affected premises the opportunity to avoid going through the winter months without heat-related services. BCS is particularly concerned about residential service accounts where service was terminated on or after January 1, 2025, and has not been reconnected.

For any accounts terminated in 2025, utilities should make at least four attempts to contact a responsible adult occupant at properties where services were terminated and remain off. These four contact attempts should include a combination of telephone calls, letters, emails, texts, and personal visits to the premises. Utility representatives should make attempts to establish contact on different days of the week and at different times of the day (including evening hours). If these attempts are unsuccessful, BCS requests a personal visit to the premises for a final attempt to communicate with the occupants or to determine that the premises is vacant.

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When reporting the results of the 2025 CWS, please use the attached *2025 Cold Weather Survey A Template* (Excel Workbook) to report the status of accounts terminated through November 30, 2025. The report should be returned to BCS no later than the close of business on December 15, 2025. Reporting instructions are provided with the template.

In addition to the 2025 CWS results, BCS requests that utilities provide a follow-up count of premises where services were terminated and reported in the 2024-2025 CWS, not re-established, and have remained off through 2025. Please submit 2024 follow-up data on the separate spreadsheet tab of the template labeled "2024 Follow-up." BCS asks that you make sure to include these premises in your 2025-2026 contact attempts, but they should not be reported again.

BCS monitors accounts categorized and reported as vacant in the survey and requests detailed information for each property, including the address, zip code, date verified, and means of determination. Please provide this information by completing the 2025 Vacant List tab on the template.

BCS strongly encourages utilities to refer consumers to available low-income assistance programs and 211 resources (e.g., Customer Assistance Program, the Low-Income Home Energy Assistance Program, Hardship Fund Program, 211 website, and county assistance offices). Utilities should also leave special information packets at premises where service is off. The packets should contain information about contacting the utility directly, applications for energy assistance, and information about any other special assistance programs.

Thank you for your continued cooperation with this important health and safety matter. Please direct your responses or any questions to Kathy Collins at kathecolli@pa.gov and Sarah Dewey sdewey@pa.gov.

Sincerely,

Lori Mohr

Lori Mohr, Director
Bureau of Consumer Services

Attachments

cc: Jennifer Berrier, Executive Director
Kelly Monaghan, Deputy Executive Director

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Form A

2025 Cold Weather Survey
Pennsylvania Public Utility Comission
Bureau of Consumer Services

	Only HEAT-related properties should be included in the survey	Initial Survey (1/1 - 11/30)	Update to Initial Survey (1/1 - 11/30)	December Survey (12/1 - 12/31)	Final Survey Results (As of 2/1/2025)
		Due 12/15	*Due 2/1*		
1	Total Number of heat-related residential premises terminated.		(SAME as Initial Survey)		0
2	Number of heat-related residential premises to be surveyed (those your records show as not reconnected).		(SAME as Initial Survey)		0
	Total of A through E below: #2 above must match this total	*0*	*0*	*0*	0
			See Regs Tab	See Regs Tab	
3	Number of heat-related residential premises terminated this year but reconnected prior to Cold Weather Survey (i.e., NOT included in the survey)				

Results

Place each of the premises from Item #2 above into one of the following categories:

A	**Number of vacant premises (reasonably sure), service is still off.**				**0**
B	**Number of premises where contact was made and service was reconnected with a payment arrangement/settlement agreement, or service was connected in a new name, or service was reconnected for other reasons.**				**0**
	(ii.) WATER Utilities ONLY: Number of premises where heat-related water service was only discovered after service was terminated on or after December 1st; therefore, service was immediately reconnected.	N/A	N/A		0
C	**Number of premises where unauthorized use was discovered. No payment arrangement established, service will remain on (with or without contact).**				**0**
D	**Number of premises where no contact was made, premises appear to be occupied, and service is still off:**				**0**
	(i.) Number of premises in D (above) identified as non-low-income customers or income is unknown.				0
	(ii.) Number of premises in D (above) identified as low-income customers (Do not include CAP customers, report CAP customers in (iii) below).				0
	(iii.) Number of premises in D (above) identified as CAP customers who have defaulted on their agreement				0
	Total of D(i) through D(iii) above: D must match this total	*0*	*0*	*0*	0
E	**Number of premises that are occupied, contact was made, and service is still off:**				**0**
	(i.) Number of premises in E (above) identified as non low income customers or income is unknown.				0
	(ii.) Number of premises in E (above) identified as low income customers (Do not include CAP customers, report CAP customers in (iii) below).				0
	(iii.) Number of premises in E (above) identified as CAP customers who have defaulted on their agreement				0
	Total of E(i) through E(iii) above: E must match this total	*0*	*0*	*0*	0
	(iv.) Number of premises in E (above) who are using an alternative heating source.				0
	Identify Alternative Heating Sources from E(iv):				
	1. Kerosene Heater				0
	2. Electric Space Heater				0
	3. Wood/Coal Stove or Furnace				0
	4. Fireplace				0
	5. Kitchen Stove/Oven				0
	6. Oil-Filled Space Heater				0
	7. Other (Specify):				0
	Total of 1 through 7 (heat source) above: E(iv) must match this total	*0*	*0*	*0*	0
	For December only, EXPLAIN why any CAP/low-income premises were terminated (in D(ii), D(iii), E(ii), and/or E(iii) above):				

Utility Name:	
Contact Person:	
Phone Number:	
Email Address:	

National Fuel Gas Distribution Corporation
Docket No. R-2026-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-H-Operating Revenues
Delivered on January 28, 2026

Prepared by or under the supervision of: Matthew W. Stoops Jr.

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-H-Operating Revenues
Delivered on January 28, 2026

III-H.11

Request:

Describe the procedures involved in determining whether forfeited discounts or penalties are applied to customer billing.

Response:

The following is contained in the Rules and Regulations section of the Company's current tariff.

Section 15 (Billing): "The late payment date specified on the monthly bill is not less than fifteen days from date the bill is mailed except that, for service under, or billed in conjunction with, residential rate schedules, the late payment date is not less than twenty days from the date the bill is mailed."

Section 16 (Penalty Charges): "If the customer fails to pay his gas bill by the late payment date, a penalty will be charged. Payments received by mail will be considered paid on the date of the postmark. Where a customer receives natural gas supply service from a qualified Supplier under Rate Schedule SATS but is not participating in the Company POR program, late payment charges will be applied to the Supplier charges only if the customer has agreed to pay Supplier late payment charges. Otherwise, late payment charges will be based on the distribution charges of the Company and natural gas supply charges of either the Company or Supplier. The penalty charged to all customers shall be 1.50% on the full unpaid and overdue balance."

Prepared by or under the supervision of: Courtney T. Mann

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-H-Operating Revenues
Delivered on January 28, 2026

III-H.12

Request:

Provide annualization of revenues as a result of rate changes occurring during the test year, at the level of operations as of the end of the test year.

Response:

Please refer to the testimony and exhibits of Company witness Courtney T. Mann, Statement No. 14. Monthly revenue calculations are provided for the fully projected future test year, future test year, and historic test year. Schedule 4 of each of Ms. Mann's exhibits show a monthly revenue price out of customer counts and volumes, which both fluctuate seasonally. Historical and projected rate changes are reflected in the appropriate effective month. The annual revenue totals from Schedule 4 are summarized by service class on Schedule 2 of each of Ms. Mann's exhibits.

Prepared by or under the supervision of: Courtney T. Mann

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-H-Operating Revenues
Delivered on January 28, 2026

III-H.13

Request:

Provide a schedule showing sales from all customer classes by unit per month for the HTY and for each of the 2 years immediately preceding the HTY. Provide the projections for the FTY and the FPFTY.

Response:

Please refer to National Fuel Exhibit CTM-1-4 for FPFTY, CTM-3-4 for FTY and CTM-5-4 for HTY. Refer to Attachment III-H.1 showing the 2 years immediately preceding the HTY.

Prepared by or under the supervision of: Courtney T. Mann

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-H-Operating Revenues
Delivered on January 28, 2026

III-H.14

Request:

Provide an analysis showing the average usage per customer by rate schedule in the operating revenue detailed in previously listed 13. If the public utility is projecting a change in the average usage per customer, provide all of the following for each rate schedule listed in the tariff:

III.H.14.a A monthly history of the average usage per rate schedule that the public utility is projecting will change covering at least 5 years; indicate if data are weather normalized.
III.H.14.b A detailed description, analysis and rationale for historical or projected, or both, changes in usage per customer and support for the change by rate schedule.
III.H.14.c The proposed year-end usage per rate schedule that the public utility is projecting for the FPFTY.
III.H.14.d The change in volume in the HTY, the FTY and the FPFTY.
III.H.14.e The dollar impact in the HTY, the FTY and the FPFTY.

Response:

Please see Attachment FRR-III.H.14

Prepared by or under the supervision of: Cathryn E. Hilliard and Courtney T. Mann.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Actual MCF per Account by Rate Schedule
III.H.14.a

	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Total
Residential	**3.6**	**6.7**	**12.3**	**16.6**	**17.7**	**14.4**	**8.7**	**6.4**	**2.8**	**1.7**	**1.5**	**1.6**	**94.0**
NFG RSS	3.5	6.6	12.2	16.4	17.5	14.3	8.6	6.3	2.8	1.7	1.5	1.6	93.2
LIRA	3.8	7.1	13.0	17.3	18.4	15.2	9.1	7.0	2.9	1.6	1.4	1.5	98.3
CAP	-	-	-	-	-	-	-	-	-	-	-	-	0.0
UCB RSS	3.7	6.8	12.7	16.9	18.1	14.7	8.9	6.6	2.9	1.7	1.6	1.7	96.2
DUAL RSS	9.9	21.4	40.3	61.8	65.7	60.1	33.0	23.3	9.5	3.6	2.6	3.2	334.4
Small C/PA	**7.5**	**14.6**	**27.4**	**38.9**	**43.8**	**36.1**	**21.1**	**13.7**	**6.7**	**4.3**	**4.1**	**4.4**	**222.7**
NGV	1,170.3	1,613.6	1,298.4	1,342.5	1,483.0	1,128.6	1,449.9	1,463.1	1,339.0	1,313.6	1,345.6	1,281.8	16,229.4
NFG SCPA-LL	2.8	6.4	13.5	19.6	22.6	18.2	9.9	5.8	2.2	1.1	1.0	1.1	104.3
NFG SCPA-UL	15.6	29.1	54.5	77.5	85.9	72.4	42.5	28.1	13.8	9.1	8.5	9.0	446.1
UCB SCPA-LL	3.0	6.6	13.8	20.2	23.5	19.4	10.6	6.4	2.4	1.4	1.1	1.4	109.7
UCB SCPA-UL	15.4	28.6	54.9	74.7	84.5	69.8	41.1	28.2	13.5	9.3	9.3	9.5	438.9
DUAL SCPA-LL	3.5	7.6	16.4	24.4	28.6	23.3	12.3	7.3	2.9	1.6	1.5	1.6	131.0
DUAL SCPA-UL	18.7	34.6	66.5	94.5	103.7	89.1	52.9	34.5	17.6	10.6	10.0	11.0	543.8
Large C/PA	**157.5**	**272.0**	**407.4**	**583.0**	**625.7**	**599.9**	**429.9**	**316.5**	**213.6**	**128.7**	**123.4**	**123.4**	**3,980.9**
NFG LCPA	65.2	118.9	198.7	277.9	294.3	256.4	162.9	118.7	65.7	45.5	41.5	41.9	1,687.4
UCB LCPA	45.6	111.4	160.0	250.1	276.0	235.6	134.8	96.0	45.0	32.0	34.8	30.7	1,451.9
DUAL LCPA	152.3	285.1	441.1	647.5	700.6	673.4	474.6	340.8	226.6	117.1	111.2	111.7	4,282.2
DMT_LCPA	3,700.8	4,628.6	5,393.0	6,870.9	7,107.9	6,888.2	6,236.7	5,159.1	4,151.9	3,634.2	3,566.4	3,565.5	60,903.2
Industrial	**1,608.4**	**2,086.2**	**2,210.5**	**2,841.4**	**3,113.3**	**3,010.7**	**2,711.0**	**2,423.6**	**2,085.0**	**2,261.2**	**2,173.0**	**2,420.1**	**28,944.5**
NFG SVIS	8.4	22.1	68.3	92.3	104.4	80.2	42.6	19.3	8.6	2.8	3.3	3.2	455.4
NFG IVIS	100.0	196.5	342.1	494.4	551.5	521.4	345.4	211.3	116.1	78.1	67.6	41.8	3,066.5
NFG LVIS	-	-	-	-	-	-	-	-	-	-	-	-	0.0
LBS	3,992.0	4,689.3	2,121.5	16.3	22.5	0.0	5.0	970.3	2,974.5	5,325.5	4,053.0	5,850.0	30,019.8
UCB SVIS	5.3	28.0	54.8	90.0	103.7	77.2	41.8	24.6	8.2	1.5	3.5	1.6	440.1
UCB IVIS	31.0	83.5	166.5	201.0	253.0	182.5	125.5	90.0	70.5	52.5	63.0	56.5	1,375.5
DUAL SVIS	11.1	34.8	79.6	120.4	131.8	98.8	50.0	27.0	10.6	3.9	3.4	3.5	574.9
DUAL IVIS	397.4	555.0	679.2	1,002.0	1,087.7	1,090.6	841.7	639.5	523.2	415.3	397.7	425.1	8,054.4
DUAL LVIS	3,789.5	4,381.1	3,990.3	4,641.7	4,906.5	5,013.3	5,039.1	4,680.6	4,872.2	5,399.0	4,637.1	4,657.5	56,007.7
DUAL LIS	26,224.0	28,144.0	30,437.0	30,931.0	32,561.0	31,080.0	34,373.0	30,062.0	32,373.0	29,287.0	31,010.0	23,373.0	359,855.0
DMT_IVIS	1,629.8	1,917.8	2,213.1	2,800.5	3,140.2	3,208.4	2,787.5	2,238.9	1,881.9	1,607.8	1,570.6	1,696.3	26,692.9
DMT_LVIS	5,575.8	7,110.5	7,201.4	8,806.0	9,427.4	9,267.0	8,411.5	6,874.8	5,832.3	5,899.2	5,778.0	6,371.7	86,555.6
DMT_LIS	29,452.2	35,997.2	38,616.5	49,493.1	54,085.5	51,939.6	46,642.1	40,229.5	33,667.2	33,958.8	33,483.6	40,311.8	487,877.1
DMLMT	61,463.0	93,128.5	97,087.8	120,536.7	137,692.8	130,954.2	139,131.3	161,050.0	143,614.0	200,754.5	191,151.5	195,263.6	1,671,827.6

National Fuel Gas Distribution Corporation
Pennsylvania Division
Actual MCF per Account by Rate Schedule
III.H.14.a

	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Total
Residential	**2.2**	**6.4**	**12.5**	**16.9**	**18.6**	**14.5**	**11.1**	**6.5**	**2.4**	**1.6**	**1.5**	**1.7**	**95.9**
NFG RSS	2.2	6.4	12.4	16.7	18.5	14.3	11.0	6.4	2.4	1.6	1.5	1.7	95.1
LIRA	2.3	6.5	13.0	17.2	19.3	15.0	11.7	7.0	2.5	1.5	1.4	1.6	99.1
CAP	-	-	-	-	-	-	-	-	-	-	-	-	0.0
UCB RSS	2.3	6.5	12.8	17.3	19.0	14.7	11.4	6.6	2.5	1.6	1.5	1.7	98.0
DUAL RSS	5.2	19.5	43.0	60.1	68.4	53.2	39.0	22.4	7.3	3.3	3.0	3.6	328.0
Small C/PA	**5.3**	**14.5**	**28.6**	**40.5**	**47.6**	**36.5**	**27.5**	**14.6**	**6.1**	**4.4**	**4.1**	**4.6**	**234.3**
NGV	1,162.1	1,370.1	1,265.6	1,362.5	1,232.6	1,014.1	1,363.1	1,380.8	1,307.6	1,372.1	1,458.1	1,457.3	15,746.1
NFG SCPA-LL	1.7	6.5	14.0	20.7	24.9	18.6	13.4	6.4	2.0	1.2	1.0	1.2	111.6
NFG SCPA-UL	11.0	29.3	57.8	81.1	93.9	72.1	54.8	29.2	12.2	9.0	8.0	9.1	467.6
UCB SCPA-LL	1.9	7.0	15.0	22.3	26.5	20.3	14.4	6.9	2.2	1.4	1.2	1.4	120.6
UCB SCPA-UL	11.5	29.2	56.0	77.0	89.8	70.6	56.0	30.1	13.6	10.6	9.6	11.3	465.2
DUAL SCPA-LL	2.2	7.7	16.8	25.9	32.0	24.3	17.2	7.9	2.8	1.7	1.3	1.6	141.4
DUAL SCPA-UL	13.3	34.8	69.6	96.7	113.6	89.4	67.5	37.7	16.0	10.9	9.9	11.3	570.5
Large C/PA	**143.9**	**239.6**	**465.2**	**556.1**	**729.9**	**587.4**	**495.6**	**357.3**	**182.8**	**130.2**	**118.8**	**124.8**	**4,131.7**
NFG LCPA	48.5	111.1	203.3	270.3	321.9	249.5	202.6	119.8	56.4	52.1	43.6	44.4	1,723.3
UCB LCPA	46.2	128.5	149.7	228.7	254.5	206.6	152.3	101.1	49.3	30.5	39.1	35.2	1,421.8
DUAL LCPA	135.8	238.6	505.4	608.4	815.9	655.4	548.3	396.2	188.2	123.4	111.5	117.8	4,444.9
DMT_LCPA	3,759.1	4,415.0	6,285.6	6,472.8	8,275.3	6,929.5	6,509.7	5,554.0	4,025.8	3,569.0	3,406.3	3,542.7	62,744.8
Industrial	**2,363.6**	**2,352.2**	**2,700.6**	**2,941.2**	**3,402.3**	**2,899.1**	**2,831.0**	**2,291.6**	**2,087.0**	**1,981.0**	**1,956.8**	**2,017.0**	**29,823.1**
NFG SVIS	4.3	22.1	59.0	93.5	110.8	81.7	57.4	28.1	7.4	2.7	2.5	2.6	472.1
NFG IVIS	83.1	151.2	457.4	574.8	723.4	533.0	372.2	230.8	95.7	192.4	137.8	108.3	3,660.0
NFG LVIS	-	-	-	-	-	-	-	-	-	-	-	-	0.0
LBS	8,819.8	6,986.5	2,993.8	0.0	0.0	0.0	29.3	411.8	4,185.5	6,002.3	6,079.3	6,717.0	42,225.0
UCB SVIS	2.0	16.3	63.0	87.8	116.3	76.0	52.2	23.5	9.2	1.9	2.4	2.2	453.0
UCB IVIS	61.5	123.0	203.0	297.5	286.5	175.5	194.0	119.5	77.0	49.0	84.0	80.3	1,750.8
DUAL SVIS	5.5	30.5	72.4	108.8	138.2	101.1	70.8	44.4	9.9	3.9	3.2	4.2	592.8
DUAL IVIS	417.8	497.6	820.7	922.4	1,204.7	1,022.1	923.0	730.4	504.9	408.9	435.5	441.2	8,329.1
DUAL LVIS	4,423.0	5,341.5	5,454.3	5,588.9	6,961.2	6,448.4	6,166.3	5,730.6	5,330.0	4,799.3	4,415.2	5,794.0	66,452.8
DUAL LIS	27,702.0	31,395.0	28,836.0	30,570.0	31,414.0	24,566.0	33,754.0	31,307.0	30,982.0	29,677.0	27,781.0	29,690.0	357,674.0
DMT_IVIS	1,619.9	1,940.6	2,828.3	2,971.9	3,816.1	3,357.9	3,431.5	2,776.2	2,191.6	1,979.7	1,828.6	1,907.8	30,650.3
DMT_LVIS	5,461.3	6,144.7	8,993.5	8,793.9	11,889.2	9,410.3	9,768.7	8,300.7	6,966.9	7,239.4	7,625.4	7,613.7	98,207.6
DMT_LIS	39,999.0	40,351.7	46,696.6	49,097.1	56,988.1	49,384.5	51,451.8	41,234.4	39,402.3	37,938.1	37,367.7	37,861.8	527,773.1
DMLMT	185,769.1	158,600.2	106,894.9	141,017.0	120,301.3	106,904.7	117,000.9	93,204.7	93,153.9	129,342.0	110,853.0	121,665.0	1,484,706.6

National Fuel Gas Distribution Corporation
Pennsylvania Division
Actual MCF per Account by Rate Schedule
III.H.14.a

	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Total
Residential	**4.3**	**6.6**	**13.4**	**15.9**	**14.7**	**13.5**	**10.1**	**6.2**	**2.7**	**1.6**	**1.5**	**1.7**	**92.3**
NFG RSS	4.3	6.6	13.3	15.8	14.6	13.4	10.0	6.2	2.7	1.5	1.5	1.7	91.5
LIRA	4.5	6.9	14.1	16.6	15.4	14.0	10.9	6.9	3.0	1.5	1.4	1.6	97.0
CAP	-	-	-	-	-	-	-	-	-	-	-	-	0.0
UCB RSS	4.5	6.7	13.8	16.1	14.9	13.7	10.2	6.4	2.8	1.6	1.5	1.8	93.9
DUAL RSS	10.9	23.3	45.0	57.2	50.8	44.8	36.3	19.9	8.0	2.6	2.2	2.8	304.0
Small C/PA	**9.3**	**15.4**	**31.4**	**40.0**	**38.1**	**33.3**	**24.7**	**13.5**	**6.7**	**4.3**	**4.1**	**4.6**	**225.4**
NGV	1,495.4	1,484.4	1,502.8	1,510.6	1,456.9	1,307.9	1,530.3	1,357.1	1,350.0	1,298.7	1,284.1	1,430.3	17,008.4
NFG SCPA-LL	3.6	7.0	15.6	20.3	19.6	16.4	11.5	5.7	2.2	1.1	1.0	1.2	105.2
NFG SCPA-UL	18.2	30.5	62.3	78.2	74.5	66.4	49.1	27.1	13.2	8.4	8.2	8.9	445.0
UCB SCPA-LL	4.2	7.3	16.9	21.5	20.6	17.5	12.5	6.2	2.3	1.3	1.0	1.4	112.5
UCB SCPA-UL	19.8	31.8	63.6	80.0	75.4	66.0	48.2	28.6	15.3	11.1	10.1	11.3	461.1
DUAL SCPA-LL	4.4	8.6	19.1	27.1	25.3	21.0	14.5	7.2	3.0	1.7	1.5	1.6	135.1
DUAL SCPA-UL	23.9	37.7	76.0	97.6	91.0	79.3	61.2	34.4	18.8	11.0	10.4	11.6	552.7
Large C/PA	**167.8**	**302.9**	**449.6**	**603.0**	**565.6**	**515.8**	**497.6**	**306.2**	**211.4**	**136.5**	**119.7**	**129.7**	**4,005.8**
NFG LCPA	74.7	126.2	216.6	268.6	253.2	230.7	191.1	110.2	61.0	42.0	34.0	41.9	1,650.4
UCB LCPA	58.5	118.8	178.5	243.6	202.9	208.7	164.0	112.0	79.4	52.2	50.0	55.0	1,523.6
DUAL LCPA	167.7	327.5	494.3	684.1	635.3	578.9	562.7	333.8	227.0	131.4	114.2	122.8	4,379.7
DMT_LCPA	3,742.1	5,071.0	5,908.2	7,046.1	7,009.7	6,206.1	6,755.7	5,208.9	4,300.7	3,754.4	3,525.0	3,692.5	62,220.3
Industrial	**1,926.0**	**2,132.1**	**2,392.1**	**2,460.2**	**2,826.2**	**2,742.6**	**2,844.9**	**2,190.7**	**1,868.5**	**1,750.7**	**1,775.4**	**1,866.8**	**26,776.2**
NFG SVIS	7.7	24.9	71.0	94.6	88.6	69.6	62.4	49.1	27.7	32.9	28.0	15.2	571.7
NFG IVIS	123.6	261.1	402.6	483.9	472.0	437.8	381.9	185.1	104.1	69.2	89.1	59.4	3,069.8
NFG LVIS	-	-	-	-	-	-	-	-	-	-	-	-	0.0
LBS	5,838.0	6,611.3	2,474.5	0.0	0.0	0.0	0.0	1,095.5	3,121.3	5,680.5	7,692.8	7,276.3	39,790.0
UCB SVIS	5.4	21.4	65.6	95.4	93.6	75.5	54.5	27.8	9.5	3.0	3.7	3.0	458.3
UCB IVIS	138.0	188.3	274.3	343.7	324.0	359.0	365.7	189.5	71.0	34.3	27.7	42.8	2,358.3
DUAL SVIS	14.1	33.9	91.6	134.2	132.7	109.9	67.5	28.6	8.7	3.3	2.1	3.2	629.9
DUAL IVIS	454.7	640.5	805.7	1,073.1	1,028.9	963.9	989.6	640.4	504.0	425.5	432.0	398.8	8,357.1
DUAL LVIS	4,926.9	4,937.3	5,256.2	6,952.1	5,885.7	6,139.0	6,424.5	5,556.0	6,111.1	6,706.4	7,052.5	7,078.0	73,025.5
DUAL LIS	26,611.0	31,565.0	28,387.0	30,458.0	31,989.0	27,624.0	27,900.0	30,530.0	28,364.0	28,241.0	27,362.0	27,381.0	346,412.0
DMT_IVIS	1,909.3	2,529.8	3,037.4	3,702.3	3,920.3	3,491.7	3,708.6	2,557.3	2,258.5	1,867.8	1,670.1	1,982.8	32,635.7
DMT_LVIS	6,282.2	7,325.5	8,605.0	11,906.8	9,723.0	10,021.1	9,940.9	9,744.8	6,861.3	5,227.5	4,271.4	4,755.7	94,665.0
DMT_LIS	37,114.7	38,027.0	41,093.9	32,466.9	48,854.5	45,968.3	48,775.7	40,365.7	35,734.4	33,045.9	32,933.5	35,585.0	469,965.5
DMLMT	132,681.7	130,049.0	156,260.4	184,812.2	174,817.8	213,723.1	209,381.6	100,130.2	82,320.9	95,807.0	123,889.0	128,338.3	1,732,211.2

National Fuel Gas Distribution Corporation
Pennsylvania Division
Actual MCF per Account by Rate Schedule
III.H.14.a

	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Total
Residential	**2.9**	**6.5**	**11.9**	**14.8**	**14.7**	**11.6**	**10.3**	**4.6**	**2.3**	**1.6**	**1.5**	**1.7**	**84.5**
NFG RSS	2.9	6.5	11.8	14.7	14.6	11.5	10.2	4.6	2.3	1.6	1.5	1.7	83.8
LIRA	3.1	7.0	13.0	15.9	16.0	12.6	11.0	5.2	2.5	1.6	1.4	1.7	90.9
CAP	-	-	-	-	-	-	-	-	-	-	-	-	0.0
UCB RSS	3.0	6.6	12.1	15.1	14.9	11.8	10.5	4.7	2.3	1.6	1.5	1.7	85.9
DUAL RSS	5.6	15.6	30.0	38.2	41.2	32.8	27.9	12.4	4.8	2.6	2.2	2.8	216.0
Small C/PA	**6.6**	**14.9**	**27.5**	**36.7**	**37.5**	**29.4**	**25.3**	**10.8**	**5.7**	**4.4**	**3.9**	**4.8**	**207.5**
NGV	1,263.7	1,370.4	1,290.0	1,452.1	1,168.6	1,267.3	1,272.6	1,304.9	1,219.6	1,307.1	1,047.0	1,687.4	15,650.7
NFG SCPA-LL	2.3	6.5	13.2	18.0	18.8	14.3	11.9	4.3	1.8	1.1	1.0	1.2	94.5
NFG SCPA-UL	13.2	29.7	54.3	73.2	72.8	59.1	51.1	21.9	11.8	9.0	8.5	9.5	413.9
UCB SCPA-LL	2.5	6.7	13.8	18.6	19.7	15.2	12.9	4.8	2.1	1.4	1.2	1.4	100.2
UCB SCPA-UL	15.2	31.8	55.6	72.1	72.7	60.4	53.5	23.4	14.2	11.6	11.0	11.6	433.1
DUAL SCPA-LL	3.1	8.2	16.2	22.9	24.3	18.4	15.3	5.6	2.3	1.7	1.4	1.7	121.2
DUAL SCPA-UL	16.7	36.3	67.7	87.4	91.0	72.6	62.9	28.5	15.1	11.4	10.1	11.9	511.6
Large C/PA	**145.9**	**273.0**	**433.1**	**509.5**	**595.0**	**502.2**	**449.1**	**296.9**	**167.1**	**131.0**	**117.4**	**131.5**	**3,751.7**
NFG LCPA	55.4	116.1	196.4	249.9	267.5	217.7	195.6	107.4	59.5	46.8	41.9	49.0	1,603.4
UCB LCPA	59.4	129.0	188.1	237.9	235.7	192.2	185.6	99.7	69.6	50.5	51.1	55.2	1,553.9
DUAL LCPA	140.9	286.0	473.7	563.3	672.9	559.7	493.8	320.2	168.3	123.1	109.1	122.7	4,033.6
DMT_LCPA	3,689.0	4,920.8	6,126.2	6,220.9	7,145.0	6,442.2	6,057.5	5,105.2	3,657.3	3,428.6	3,342.2	3,685.7	59,820.7
Industrial	**1,833.8**	**2,286.6**	**2,720.7**	**2,700.8**	**3,141.7**	**2,798.4**	**2,623.9**	**2,458.1**	**1,979.8**	**1,846.8**	**1,800.7**	**1,968.2**	**28,159.5**
NFG SVIS	5.5	20.4	59.6	79.1	90.8	62.6	48.2	18.2	5.7	3.9	3.2	3.7	400.8
NFG IVIS	147.3	148.5	306.7	408.2	440.5	368.3	291.3	174.6	79.4	72.9	133.6	99.4	2,670.7
NFG LVIS	-	-	-	-	-	-	-	-	-	-	-	-	0.0
LBS	6,832.5	4,894.0	2,403.3	0.0	0.0	0.0	0.0	749.8	2,196.3	4,397.5	4,452.5	4,777.8	30,703.5
UCB SVIS	3.1	19.1	57.2	83.5	83.7	55.0	46.3	14.8	3.6	1.9	1.6	2.0	371.5
UCB IVIS	72.3	217.3	540.8	619.5	557.5	324.4	262.0	89.2	22.8	8.8	6.2	6.8	2,727.5
DUAL SVIS	7.8	34.6	68.9	99.5	102.5	78.9	65.3	25.3	7.8	5.5	3.9	4.5	504.5
DUAL IVIS	464.3	630.4	832.5	1,002.0	1,151.6	1,015.5	929.8	636.9	459.2	369.2	334.6	360.5	8,186.4
DUAL LVIS	6,960.9	8,744.2	10,268.2	5,365.0	5,747.3	5,615.6	5,861.7	5,009.9	5,267.7	4,504.1	4,894.9	5,260.9	73,500.3
DUAL LIS	20,152.0	28,669.0	27,499.0	24,331.0	34,208.0	33,146.0	33,345.0	15,032.0	23,379.0	27,658.0	28,632.0	26,651.0	322,702.0
DMT_IVIS	1,824.3	2,387.8	3,073.4	3,047.4	3,834.7	3,324.6	2,771.4	2,472.7	1,768.9	1,536.7	1,513.4	1,605.9	29,161.1
DMT_LVIS	5,222.9	11,154.0	14,321.9	9,922.1	12,150.9	8,765.8	10,086.9	11,014.0	6,947.7	5,311.2	5,513.3	5,399.8	105,810.5
DMT_LIS	31,545.8	38,227.9	42,684.6	44,842.9	50,698.4	47,246.7	45,734.3	43,456.3	36,544.4	40,009.1	38,554.6	43,411.6	502,956.4
DMLMT	157,461.8	117,772.1	162,966.6	196,208.9	202,835.2	190,156.4	133,280.9	165,046.4	129,696.3	-	-	-	1,455,424.6

National Fuel Gas Distribution Corporation
Pennsylvania Division
Actual MCF per Account by Rate Schedule
III.H.14.a

	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Total
Residential	**2.6**	**5.5**	**13.1**	**18.0**	**18.5**	**14.7**	**9.9**	**5.3**	**3.0**	**1.5**	**1.5**	**1.9**	**95.5**
NFG RSS	2.6	5.5	13.0	17.9	18.4	14.5	9.8	5.2	3.0	1.5	1.5	1.9	94.8
LIRA	2.8	6.1	14.2	19.6	20.1	16.0	10.9	6.0	3.4	1.5	1.5	1.9	104.0
CAP	-	-	-	-	-	-	-	-	-	-	-	-	0.0
UCB RSS	2.6	5.5	13.2	18.2	18.7	14.9	10.0	5.3	3.0	1.5	1.5	1.9	96.4
DUAL RSS	4.3	12.0	28.4	43.5	47.5	36.6	24.3	12.9	6.7	2.3	2.1	2.9	223.5
Small C/PA	**6.3**	**13.0**	**30.5**	**45.5**	**49.2**	**38.8**	**24.4**	**12.2**	**7.2**	**4.3**	**4.1**	**4.9**	**240.4**
NGV	1,148.3	1,446.0	1,356.0	1,253.6	1,316.0	1,303.0	1,276.4	1,148.9	1,207.9	1,272.4	1,251.4	1,377.4	15,357.3
NFG SCPA-LL	2.0	5.5	14.8	22.8	25.5	19.5	11.5	4.9	2.4	1.1	1.0	1.3	112.3
NFG SCPA-UL	13.1	26.5	61.8	90.6	97.4	78.9	50.8	26.2	15.7	9.5	9.0	11.0	490.6
UCB SCPA-LL	2.3	5.9	15.8	24.7	26.4	21.8	12.5	5.5	2.6	1.1	1.1	1.4	121.1
UCB SCPA-UL	15.0	28.2	61.7	91.2	92.4	77.6	49.2	27.5	16.7	12.0	11.2	13.3	495.9
DUAL SCPA-LL	2.8	7.2	18.7	29.1	32.5	24.2	13.5	6.2	3.1	1.4	1.2	1.6	141.4
DUAL SCPA-UL	16.0	31.8	72.6	111.1	116.6	94.4	61.0	31.9	19.2	10.6	10.1	12.1	587.5
Large C/PA	**146.6**	**259.1**	**407.1**	**616.8**	**712.2**	**617.9**	**470.7**	**329.6**	**209.2**	**138.7**	**128.5**	**145.7**	**4,181.9**
NFG LCPA	59.2	106.4	203.3	311.8	329.3	299.1	217.0	130.5	84.7	53.6	51.5	59.8	1,906.2
UCB LCPA	63.1	120.0	208.9	302.2	316.4	274.0	175.9	126.0	71.8	59.9	49.1	62.3	1,829.4
DUAL LCPA	137.7	271.6	436.5	682.4	811.2	687.7	512.0	355.1	219.4	130.7	113.6	137.9	4,495.8
DMT_LCPA	3,927.1	4,835.7	5,802.2	7,353.1	8,222.9	7,815.7	7,122.8	5,921.5	4,175.3	3,946.2	4,123.9	3,915.2	67,161.4
Industrial	**1,937.5**	**2,148.7**	**2,385.9**	**2,905.5**	**3,456.7**	**3,060.1**	**2,896.6**	**2,262.9**	**1,966.8**	**1,754.7**	**1,894.0**	**1,859.7**	**28,529.2**
NFG SVIS	5.4	19.2	63.5	111.5	111.4	83.1	51.2	21.2	9.5	3.3	2.7	3.2	485.0
NFG IVIS	130.5	199.1	344.8	630.7	680.1	582.9	395.3	246.5	140.0	97.3	126.1	127.6	3,700.7
NFG LVIS	-	-	-	-	-	-	-	-	-	-	-	-	0.0
LBS	5,139.8	5,128.0	1,656.0	1.8	0.8	0.0	0.0	1,363.0	2,543.5	4,369.0	6,107.3	5,896.0	32,205.0
UCB SVIS	2.9	11.2	40.8	69.5	84.1	70.5	38.2	18.4	5.2	2.1	2.6	1.8	347.3
UCB IVIS	10.1	75.5	246.7	424.8	363.9	329.3	321.7	149.0	33.0	4.7	1.3	3.0	1,962.9
DUAL SVIS	12.1	47.5	84.8	144.1	161.1	116.2	70.0	31.8	14.6	5.2	4.2	4.7	696.6
DUAL IVIS	366.3	505.3	678.0	1,024.6	1,275.3	1,110.5	871.6	617.5	446.2	378.2	337.0	385.2	7,995.4
DUAL LVIS	4,296.1	5,298.7	5,933.9	5,851.7	7,056.0	5,764.6	6,132.9	6,790.1	6,058.6	5,756.9	5,107.4	6,290.7	70,337.6
DUAL LIS	30,946.0	30,426.0	32,253.0	29,558.0	35,804.0	32,014.0	33,409.0	30,961.0	29,869.0	26,644.0	26,501.0	27,507.0	365,892.0
DMT_IVIS	1,582.0	2,060.4	2,233.9	3,190.4	4,047.1	3,449.9	3,006.6	2,429.3	1,909.2	1,749.9	1,678.3	1,586.9	28,923.9
DMT_LVIS	5,382.0	6,370.3	7,289.9	8,847.7	11,427.0	10,146.0	9,220.7	6,993.6	6,548.4	5,443.2	5,225.0	5,382.8	88,276.7
DMT_LIS	42,715.8	45,379.2	49,536.5	56,757.0	65,958.7	59,368.0	57,678.0	44,943.8	39,784.0	35,268.3	39,502.9	37,518.0	574,410.3
DMLMT	-	-	-	-	-	-	-	-	-	-	-	-	0.0

National Fuel Gas Distribution Corporation
Pennsylvania Division
2026 Base Rate Case
Filing Requirement Response III.H.14.b

III.H.14.b A detailed description, analysis and rationale for historical or projected, or both, changes in usage per customer and support for the change by rate schedule.

Usage per customer is forecasted for each service class using econometric models informed by recent historical data. For further details regarding the forecasting methodology, please refer to the direct testimony of Cathryn E. Hilliard and Exhibit CEH-3.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Actual MCF per Account by Rate Schedule
III.H.14.c

	FPFTY (11/26-10/27)
Residential	**95.6**
NFG RSS	94.7
LIRA	103.1
CAP	0.0
UCB RSS	97.2
DUAL RSS	247.3
Small C/PA	**235.9**
NGV	18,922.0
NFG SCPA-LL	109.0
NFG SCPA-UL	464.1
UCB SCPA-LL	116.2
UCB SCPA-UL	469.3
DUAL SCPA-LL	140.3
DUAL SCPA-UL	569.7
Large C/PA	**4,081.7**
NFG LCPA	1,699.5
UCB LCPA	1,582.6
DUAL LCPA	4,442.5
DMT_LCPA	65,703.2
Industrial	**30,729.8**
NFG SVIS	468.1
NFG IVIS	3,082.8
NFG LVIS	0.0
LBS	34,157.6
UCB SVIS	445.5
UCB IVIS	1,885.9
DUAL SVIS	603.0
DUAL IVIS	8,870.9
DUAL LVIS	66,857.1
DUAL LIS	358,268.3
DMT_IVIS	29,633.3
DMT_LVIS	92,942.8
DMT_LIS	651,718.9
DMLMT	0.0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Actual MCF by Rate Schedule
III.H.14.d

	Total Volume			Change in Volume from HTY		% Change in Volume from HTY	
	HTY (10/24-09/25)	FTY (10/25-09/26)	FPFTY (11/26-10/27)	FTY (10/25-09/26)	FPFTY (11/26-10/27)	FTY (10/25-09/26)	FPFTY (11/26-10/27)
Residential	18,843,090	18,879,957	18,958,326	36,867	115,236	0.2%	0.6%
NFG RSS	16,378,426	16,501,733	16,570,240	123,306	191,814	0.8%	1.2%
LIRA	616,234	678,491	681,296	62,257	65,061	10.1%	10.6%
CAP	0	0	0	0	0	0.0%	0.0%
UCB RSS	1,737,576	1,584,984	1,591,601	(152,593)	(145,975)	-8.8%	-8.4%
DUAL RSS	110,853	114,750	115,189	3,896	4,336	3.5%	3.9%
Small C/PA	3,570,576	3,510,212	3,544,953	(60,364)	(25,623)	-1.7%	-0.7%
NGV	108,649	132,038	132,454	23,389	23,805	21.5%	21.9%
NFG SCPA-LL	969,885	936,076	941,174	(33,808)	(28,711)	-3.5%	-3.0%
NFG SCPA-UL	1,345,159	1,295,043	1,304,979	(50,116)	(40,180)	-3.7%	-3.0%
UCB SCPA-LL	91,096	79,764	72,391	(11,332)	(18,705)	-12.4%	-20.5%
UCB SCPA-UL	157,560	135,114	120,718	(22,446)	(36,841)	-14.2%	-23.4%
DUAL SCPA-LL	162,632	175,746	185,908	13,114	23,276	8.1%	14.3%
DUAL SCPA-UL	735,595	756,431	787,328	20,836	51,733	2.8%	7.0%
Large C/PA	6,324,589	6,284,282	6,276,426	(40,307)	(48,163)	-0.6%	-0.8%
NFG LCPA	880,358	796,215	790,983	(84,143)	(89,375)	-9.6%	-10.2%
UCB LCPA	86,626	76,891	76,833	(9,735)	(9,793)	-11.2%	-11.3%
DUAL LCPA	4,454,365	4,491,331	4,488,765	36,966	34,400	0.8%	0.8%
DMT_LCPA	903,240	919,844	919,844	16,605	16,605	1.8%	1.8%
Industrial	17,050,226	17,918,832	18,469,516	868,606	1,419,291	5.1%	8.3%
NFG SVIS	62,289	59,062	60,192	(3,227)	(2,097)	-5.2%	-3.4%
NFG IVIS	208,410	171,352	166,107	(37,057)	(42,303)	-17.8%	-20.3%
NFG LVIS	0	0	0	0	0	0.0%	0.0%
LBS	128,820	129,209	136,630	389	7,810	0.3%	6.1%
UCB SVIS	3,785	4,900	4,900	1,116	1,116	29.5%	29.5%
UCB IVIS	6,678	5,658	5,658	(1,020)	(1,020)	-15.3%	-15.3%
DUAL SVIS	44,404	38,326	39,506	(6,078)	(4,898)	-13.7%	-11.0%
DUAL IVIS	2,081,364	2,371,147	2,370,483	289,783	289,119	13.9%	13.9%
DUAL LVIS	492,363	467,907	468,000	(24,456)	(24,363)	-5.0%	-4.9%
DUAL LIS	365,892	349,999	358,268	(15,893)	(7,624)	-4.3%	-2.1%
DMT_IVIS	711,548	711,214	711,200	(335)	(348)	0.0%	0.0%
DMT_LVIS	1,776,183	1,743,516	1,765,913	(32,668)	(10,270)	-1.8%	-0.6%
DMT_LIS	11,168,490	11,866,542	12,382,658	698,051	1,214,168	6.3%	10.9%
DMLMT	0	0	0	0	0	0.0%	0.0%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Dollar Impact
III.H.14.e

	HTY	FPFTY		HTY	FTY		FPFTY	FTY	
	Distribution Charges	Distribution Charges	Difference	Distribution Charges	Distribution Charges	Difference	Distribution Charges	Distribution Charges	Difference
Residential Sales	48,519,899	49,066,137	(546,238)	48,519,899	48,863,281	(343,381)	49,066,137	48,863,281	202,856
Residential CAP	1,820,873	2,017,384	(196,511)	1,820,873	2,009,080	(188,207)	2,017,384	2,009,080	8,304
Residential SATC	5,146,001	4,712,891	433,110	5,146,001	4,693,295	452,706	4,712,891	4,693,295	19,596
Residential MMT	328,335	341,087	(12,752)	328,335	339,785	(11,450)	341,087	339,785	1,302
Total Residential	55,815,109	56,137,499	(322,391)	55,815,109	55,905,441	(90,332)	56,137,499	55,905,441	232,059
SCPA < 250 Sales	2,238,220	2,382,014	(143,794)	2,238,220	2,366,005	(127,785)	2,382,014	2,366,005	16,009
SCPA < 250 SATC	209,949	166,456	43,492	209,949	183,410	26,539	166,456	183,410	(16,954)
SCPA < 250 MMT	377,321	427,477	(50,156)	377,321	404,110	(26,789)	427,477	404,110	23,367
SCPA > 250 Sales	2,769,972	2,658,913	111,059	2,769,972	2,625,286	144,686	2,658,913	2,625,286	33,627
SCPA > 250 SATC	325,398	248,137	77,262	325,398	277,726	47,672	248,137	277,726	(29,589)
SCPA > 250 MMT	1,514,249	1,618,353	(104,105)	1,514,249	1,554,845	(40,596)	1,618,353	1,554,845	63,509
LCPA	1,469,662	1,280,006	189,656	1,469,662	1,285,551	184,111	1,280,006	1,285,551	(5,545)
LCPA SATC	144,141	127,712	16,428	144,141	127,808	16,332	127,712	127,808	(96)
LCPA MMT	7,429,402	7,461,226	(31,824)	7,429,402	7,465,490	(36,088)	7,461,226	7,465,490	(4,264)
LCPA DMT	1,501,365	1,528,965	(27,600)	1,501,365	1,528,965	(27,600)	1,528,965	1,528,965	(0)
Natural Gas Vehicles	236,291	125,333	110,958	236,291	143,274	93,017	125,333	143,274	(17,941)
Total Commercial & Public Authority	18,215,969	18,024,592	191,378	18,215,969	17,962,471	253,499	18,024,592	17,962,471	62,121
SVIS Sales	129,298	124,730	4,567	129,298	122,389	6,909	124,730	122,389	2,342
SVIS SATC	7,796	10,155	(2,359)	7,796	10,155	(2,359)	10,155	10,155	0
SVIS MMT	93,516	81,865	11,651	93,516	79,419	14,097	81,865	79,419	2,446
IVIS Sales	280,962	221,703	59,259	280,962	228,704	52,258	221,703	228,704	(7,001)
IVIS SATC	8,896	7,551	1,345	8,896	7,551	1,345	7,551	7,551	0
IVIS MMT	2,820,095	3,346,244	(526,150)	2,820,095	3,337,225	(517,131)	3,346,244	3,337,225	9,019
IVIS DMT	953,086	949,239	3,847	953,086	949,257	3,829	949,239	949,257	(19)
LVIS MMT	504,327	479,372	24,955	504,327	479,277	25,050	479,372	479,277	95
LVIS DMT	1,872,669	1,808,824	63,844	1,872,669	1,785,883	86,786	1,808,824	1,785,883	22,942
LIS MMT	219,279	214,710	4,569	219,279	209,754	9,525	214,710	209,754	4,956
LIS DMT	2,046,477	2,004,648	41,829	2,046,477	1,936,072	110,405	2,004,648	1,936,072	68,576
LIS DMT Negotiated	2,336,285	2,672,862	(336,577)	2,336,285	2,564,333	(228,048)	2,672,862	2,564,333	108,529
Total Industrial	11,272,685	11,921,905	(649,220)	11,272,685	11,710,020	(437,335)	11,921,905	11,710,020	211,884
Grand Total	85,303,763	86,083,996	(780,233)	85,303,763	85,577,932	(274,169)	86,083,996	85,577,932	506,064

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-H-Operating Revenues
Delivered on January 28, 2026

III-H.15

Request:

If the public utility uses an alternative ratemaking mechanism, provide an analysis showing the alternative ratemaking mechanism's proposed impact on revenues in the FTY and the FPFTY. If the public utility is projecting an increase or decrease in the average usage per customer as a result of the alternative ratemaking mechanism, provide all of the following for each rate schedule listed on the tariff:

III.H.15.a The non-adjusted sales used in the calculation.
III.H.15.b The alternative ratemaking mechanism used.
III.H.15.c The proposed average usage per rate schedule that the public utility is projecting for the FPFTY.
III.H.15.d The change in volume in the HTY, the FTY and the FPFTY.
III.H.15.e The dollar impact in the HTY, the FTY and the FPFTY.

Response:

The Company has a weather normalization adjustment mechanism as an alternative ratemaking mechanism for the HTY. Please see testimony and exhibits of witness Courtney T. Mann and see Exhibit CTM-5 for HTY. Since the FTY and FPFTY utilize a demand forecast based on normal weather, the weather normalization adjustment is assumed to have no impact on the FTY and FPFTY.

Prepared by or under the supervision of: Courtney T. Mann

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-H-Operating Revenues
Delivered on January 28, 2026

III-H.16

Request:

If the public utility uses an alternative ratemaking mechanism adjustment in the tariff, provide the most recent 2-year calculation of the alternative ratemaking calculation used to adjust rates, summarizing the revenue received by the public utility or credited to the customers by rate schedule each year.

Response:

The Company uses a Weather Normalization Adjustment which is found on page 158 of Pa. P.U.C No. 9 (Included in this filing under National Fuel Gas Exhibit F – Current Tariff). Please see Exhibit CTM-5-4 for a breakdown of revenues by rate schedule associated with the Weather Normalization Adjustment. The Company does not consider the Distribution System Improvement Charge as an alternative ratemaking adjustment.

Prepared by or under the supervision of: Courtney T. Mann

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-H-Operating Revenues
Delivered on January 28, 2026

III-H.17

Request:

If the public utility's present tariff uses an alternative ratemaking adjustment, describe how the revenue received by the public utility or credited to customers was reflected in the filing.

Response:

The Company uses a Weather Normalization Adjustment as an alternative ratemaking adjustment. The Weather Normalization Adjustment revenue is reflected in Exhibit CTM-5. The Company does not consider the Distribution System Improvement Charge as an alternative ratemaking adjustment.

Prepared by or under the supervision of: Courtney T. Mann

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-H-Operating Revenues
Delivered on January 28, 2026

III-H.18

Request:

Provide a schedule that shows the actual monthly amount received from each of the following sources for the HTY and the 2 years immediately preceding the HTY. State how revenues are presented for ratemaking purposes. Provide a breakdown of the amount projected to be received from each of the following sources that supports the amount reflected on the FTY and the FPFTY Income Statements:

III.H.18.a Forfeited discounts.
III.H.18.b Late payment fees.
III.H.18.c Miscellaneous revenues.
III.H.18.d Other revenues.
III.H.18.e Interest and Dividend Income.
III.H.18.f Other public utility Operating Income.
III.H.18.g Revenues from merchandising, jobbing and contract work.
III.H.18.h Revenues from non-public utility operations.
III.H.18.i Rental income.
III.H.18.j Equity in earnings of subsidiary companies.
III.H.18.k Interest and dividend income.
III.H.18.l AFUDC.
III.H.18.m Miscellaneous nonoperating income.
III.H.18.n Gain on disposition of property.
III.H.18.o Rent from public utility property.
III.H.18.p Revenues from transporting water, gas or electricity for others.

Response:

a. Not applicable. Any amounts shown under FERC Account 487 (Forfeited Discounts) throughout the Company's filing represent late payment fees – see (b).
b. See Attachment III-H.5 for the HTY and two years preceding the HTY. Late payment fees are reflected in Other Operating Revenues for ratemaking purposes. For the projected periods, see National Fuel Exhibit CTM-1, Schedule 5 (FPFTY at Current Rates) and National Fuel Exhibit CTM-3, Schedule 5 (FTY at Current Rates).
c. The Company has not booked any amounts to FERC Account 488 (miscellaneous revenues) in historical periods and is not claiming any miscellaneous revenue in its projections for ratemaking purposes.
d. For other revenues booked to FERC Account 495, see Attachment III-H.5 for the HTY and two years preceding the HTY. Other revenues are reflected in Other Operating Revenues for ratemaking purposes. For the projected periods, see National Fuel Exhibit CTM-1, Schedule 1 (FPFTY at Current Rates) and National Fuel Exhibit CTM-3,

Schedule 1 (FTY at Current Rates). The amounts presented match the HTY (excluding capacity release revenues as discussed in the testimony of Courtney T. Mann (National Fuel Statement No. 14).

e. Interest and dividend income is reflected in FERC Account 419. See III.H.18 Attachment 1 for the HTY and two years preceding the HTY. Amounts for interest and dividend income are not reflected in my FTY or FPFTY exhibits.
f. Not applicable.
g. See III.H.18 Attachment 1 for the HTY and two years preceding the HTY. Jobbing revenue is reflected as a credit to O&M expense on the Company's books and for ratemaking purposes. In the FTY and FPFTY, these amounts are reflected in National Fuel Exhibit A, Schedule B-4 under FERC Account 903.
h. Not applicable.
i. For rental income booked to FERC Account 493, see Attachment III-H.5 for the HTY and two years preceding the HTY. Other revenues are reflected in Other Operating Revenues for ratemaking purposes. For the projected periods, see National Fuel Exhibit CTM-1, Schedule 1 (FPFTY at Current Rates) and National Fuel Exhibit CTM-3, Schedule 1 (FTY at Current Rates). The amounts presented match the HTY amounts.
j. Not applicable.
k. See subpart (e).
l. See III.H.18 Attachment 1 for the HTY and two years preceding the HTY. The Company is not making a claim for construction work in progress in the FTY or FPFTY and has not included any AFUDC in its revenue requirement.
m. Miscellaneous nonoperating income is booked to FERC Account 421. See III.H.18 Attachment 1 for the HTY and two years preceding the HTY. The amounts for misc. nonoperating revenue are booked to general ledger account 421000. No amounts for this item are reflected in my FTY or FPFTY exhibits for ratemaking purposes.
n. Gains on disposition of property are booked to FERC Account 421. See III.H.18 Attachment 1 for the HTY and two years preceding the HTY. No amounts for this item are reflected in my FTY or FPFTY exhibits for ratemaking purposes.
o. Not applicable.
p. Amounts booked to FERC Account 489 are presented in National Fuel Exhibits CTM-5 (HTY), CTM-3 (FTY at Current Rates) and CTM-1 (FPFTY at Current Rates). Amounts for the two years preceding the HTY can be found in my response to III.H.1.

Prepared by or under the supervision of: Courtney T. Mann

National Fuel Gas Distribution Corporation
Pennsylvania Division
Attachment 1
III.H.18.e

Sum of Amount	Column Labels				
	419001	419007	419015	419100	Grand Total
Row Labels	INTEREST & DIVIDEND INCOME - TAXABLE	INTEREST INCOME - DEFERRED GAS COST	PAD - C-Factor Storage Int Inc	AFUDC - ALLOWANCE FOR FUNDS USED DURING CONSTRUCTION	
2023					
1	(70,442.08)	(59,185.58)		(5,280.22)	(134,907.88)
2	(63,402.25)	(65,665.14)		(4,060.43)	(133,127.82)
3	(68,525.36)	(65,665.14)		(3,736.55)	(137,927.05)
4	(74,303.20)	(65,665.14)			(139,968.34)
5	(100,607.09)	(65,665.14)		42,078.04	(124,194.19)
6	(80,726.66)	(54,720.95)			(135,447.61)
7	(82,054.42)	(76,609.33)			(158,663.75)
8	(87,374.89)	(65,665.14)			(153,040.03)
9	(85,584.17)	(65,665.14)			(151,249.31)
10	(88,903.09)	(65,665.14)			(154,568.23)
11	(93,868.95)				(93,868.95)
12	(88,781.29)				(88,781.29)
2023 Total	**(984,573.45)**	**(650,171.84)**		**29,000.84**	**(1,605,744.45)**
2024					
1	(93,962.76)	(24.04)			(93,986.80)
2	(69,055.99)				(69,055.99)
3	(68,588.87)	(3.22)			(68,592.09)
4	(70,224.00)				(70,224.00)
5	(62,952.38)				(62,952.38)
6	(70,967.92)	(48.61)			(71,016.53)
7	(69,758.13)				(69,758.13)
8	(71,649.15)				(71,649.15)
9	(71,336.24)				(71,336.24)
10	(72,834.54)	(34.64)			(72,869.18)
11	(70,721.43)				(70,721.43)
12	(63,238.90)		(178,214.00)		(241,452.90)
2024 Total	**(855,290.31)**	**(110.51)**	**(178,214.00)**		**(1,033,614.82)**
2025					
1	(56,806.57)				(56,806.57)
2	(54,230.56)				(54,230.56)
3	(47,138.61)				(47,138.61)
4	(42,413.35)				(42,413.35)
5	(44,052.82)			(45,674.45)	(89,727.27)
6	(42,591.07)				(42,591.07)
7	(38,780.45)				(38,780.45)
8	(50,892.15)				(50,892.15)
9	(41,757.28)				(41,757.28)
10	(36,551.95)				(36,551.95)
11	(42,261.35)	(60,010.58)			(102,271.93)
12	(45,286.08)	(60,010.58)			(105,296.66)
2025 Total	**(542,762.24)**	**(120,021.16)**		**(45,674.45)**	**(708,457.85)**
Grand Total	**(2,382,626.00)**	**(770,303.51)**	**(178,214.00)**	**(16,673.61)**	**(3,347,817.12)**

Sum of Amount	Column Labels	
	551500	Grand Total
Row Labels	RECONNECTION CHARGE	
2023		
1	(40,779.00)	(40,779.00)
2	(29,660.16)	(29,660.16)
3	(8,807.40)	(8,807.40)
4	(2,617.08)	(2,617.08)
5	(1,720.08)	(1,720.08)
6	(690.00)	(690.00)
7	(48,290.04)	(48,290.04)
8	(46,023.00)	(46,023.00)
9	(38,211.24)	(38,211.24)
10	(33,464.88)	(33,464.88)
11	(38,842.08)	(38,842.08)
12	(43,593.24)	(43,593.24)
2023 Total	**(332,698.20)**	**(332,698.20)**
2024		
1	(57,264.96)	(57,264.96)
2	(37,136.88)	(37,136.88)
3	(7,121.88)	(7,121.88)
4	(3,730.92)	(3,730.92)
5	(1,582.08)	(1,582.08)
6	(1,246.92)	(1,246.92)
7	(57,885.96)	(57,885.96)
8	(43,923.48)	(43,923.48)
9	(37,595.16)	(37,595.16)
10	(30,636.00)	(30,636.00)
11	(38,166.84)	(38,166.84)
12	(36,658.68)	(36,658.68)
2024 Total	**(352,949.76)**	**(352,949.76)**
2025		
1	(58,334.52)	(58,334.52)
2	(33,519.24)	(33,519.24)
3	(12,991.80)	(12,991.80)
4	(3,292.32)	(3,292.32)
5	(2,281.92)	(2,281.92)
6	(1,863.00)	(1,863.00)
7	(67,644.48)	(67,644.48)
8	(66,688.56)	(66,688.56)
9	(43,174.32)	(43,174.32)
10	(44,524.68)	(44,524.68)
11	(43,923.48)	(43,923.48)
12	(43,479.84)	(43,479.84)
2025 Total	**(421,718.16)**	**(421,718.16)**
Grand Total	**(1,107,366.12)**	**(1,107,366.12)**

Sum of Amount	Column Labels					
Row Labels	421200 LOSS - DISPOSAL OF PROPERTY	421011 Unrealized Gain/Loss on Investments	421012 Realized Gain/Loss on Investments	421100 GAIN - DISPOSAL OF PROPERTY	421000 MISCELLANEOUS NON-OPERATING REVENUE	Grand Total
2023						
1		(574,180.56)	691,199.51			117,018.95
2		(92,909.34)				(92,909.34)
3		(11,647.53)				(11,647.53)
4	6,681.18	(140,184.79)			(34.78)	(133,538.39)
5		152,347.69			-	152,347.69
6	-	(129,303.34)		(48,990.33)	(4,042.50)	(182,336.17)
8		82,835.82			(20.76)	82,815.06
9	41.00	71,254.53		(31,421.90)		39,873.63
10		(23,832.81)				(23,832.81)
11	(365.12)	11,958.20				11,593.08
12	-	96,029.00		(178,755.55)		(82,726.55)
2023 Total	**6,357.06**	**(557,633.13)**	**691,199.51**	**(259,167.78)**	**(4,098.04)**	**(123,342.38)**
2024						
1		48,180.17				48,180.17
2	-	(169,264.59)		(37,784.41)	(34.77)	(207,083.77)
3		(145,621.86)				(145,621.86)
4		(24,358.96)			(203,662.20)	(228,021.16)
5		97,804.80			(28.98)	97,775.82
6	223.31	(12,265.85)		(58,919.08)	203,652.20	132,690.58
7	-	110,818.12		(2,255.84)	(4,042.50)	104,519.78
8	9,533.00	(49,442.37)				(39,909.37)
9	(28,225.00)	(37,226.23)		(14,646.73)	(100.00)	(80,197.96)
10	16,684.67	(124,573.74)		(45,572.90)	(66.65)	(153,528.62)
11	4,444.71	(75,034.75)		(16,718.00)	(66.69)	(87,374.73)
12	-	(75,307.87)		(67,258.35)		(142,566.22)
2024 Total	**2,660.69**	**(456,293.13)**		**(243,155.31)**	**(4,349.59)**	**(701,137.34)**
2025						
1	3,939.85	163,668.12		(66,122.30)	(50.00)	101,435.67
2	801.41	(12,642.26)		(49,057.80)		(60,898.65)
3	-	38,100.97		(19,463.62)		18,637.35
4	-	(12,750.09)		(52,373.00)	(40.00)	(65,163.09)
5	-	(76,766.06)		(13,500.68)	(41.80)	(90,308.54)
6	6,905.01			(49,439.00)	(4,042.50)	(46,576.49)
7		(38,655.46)				(38,655.46)
8	-	38,774.65		(13,466.64)	(187.60)	25,120.41
9	(10,205.00)	(51,915.92)		(2,413.25)		(64,534.17)
10	0.00	39,066.55		(94,350.11)	(20.55)	(55,304.11)
11		(78,354.60)			(12.50)	(78,367.10)
12	640.57	(188,851.62)	184,023.35	(105,979.40)		(110,167.10)
2025 Total	**2,081.84**	**(180,325.72)**	**184,023.35**	**(466,165.80)**	**(4,394.95)**	**(464,781.28)**
Grand Total	**11,099.59**	**(1,194,251.98)**	**875,222.86**	**(968,488.89)**	**(12,842.58)**	**(1,289,261.00)**

Fiscal Year	Month	PA AFUDC	PA BFUDC
2023	October	$5,280	($3,441)
2023	November	$4,060	($2,646)
2023	December	$3,737	($2,435)
2023	January	$0	$29,847
2023	February	($42,078)	($65,549)
2023	March	$0	($4,772)
2023	April	$0	($14,503)
2023	May	$0	($11,968)
2023	June	$0	($18,663)
2023	July	$0	($42,375)
2023	August	$0	($54,046)
2023	September	$0	($59,196)
2024	October	$0	($18,514)
2024	November	$0	($20,286)
2024	December	$0	($12,183)
2024	January	$0	($5,309)
2024	February	$0	($65,000)
2024	March	$0	($16,548)
2024	April	$0	($14,087)
2024	May	$0	($20,681)
2024	June	$0	($39,244)
2024	July	$0	($46,896)
2024	August	$0	($66,657)
2024	September	$0	($42,856)
2025	October	$0	($24,902)
2025	November	$0	($25,038)
2025	December	$0	($24,706)
2025	January	$0	($18,801)
2025	February	$45,674	$34,975
2025	March	$0	($10,020)
2025	April	$0	($1,557)
2025	May	$0	($6,286)
2025	June	$0	($3,718)
2025	July	$0	($18,218)
2025	August	$0	($24,401)
2025	September	$0	($51,280)
2023		($29,001)	($249,747)
2024		$0	($368,262)
2025		$45,674	($173,952)

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-I-Operating Expenses
Delivered on January 28, 2026

III-I.1

Request:

Provide a list of operating expenses BY ACCOUNT for the HTY, the 2 years immediately preceding the HTY, the FTY and the FPFTY. THE PUBLIC UTILITY SHALL EXPLAIN ADJUSTMENTS TO OPERATING EXPENSES IN FILED TESTIMONY AND IN ADDITIONAL SCHEDULES SHOWING DETAILS OF THE CLAIMED EXPENSES.

Response:

Please see III-I.1 Attachment A for operating expenses by account for the HTY, 2 years immediately prior to the HTY. Please refer to National Fuel Exhibit A_FTY and National Fuel Exhibit A_FPFTY, Schedules D-1 for operating expenses of the projected test periods. Please refer to the direct testimony of Anthony Formato, Statement No. 3 for explanations of any adjustments to O&M operating expenses. Please refer to the direct testimony of Michael Weidner, Statement No. 5 for explanations of any adjustments to benefit expenses.

Prepared by or under the supervision of: Donald N. Koch

9.30.23 Summary

Row Labels	Sum of Sum Total Amt
DT_753000	$ 68,602.80
DT_754000	$ 1,217.98
DT_756000	$ 69.34
DT_757000	$ 833.40
DT_759000	$ 670.83
DT_762000	$ 418.32
DT_764000	$ (3,591.95)
DT_769000	$ 4,019.71
DT_807200	$ 91,206.47
DT_807300	$ 29,771.47
DT_807500	$ 102,750.62
DT_812000	$ (47,758.48)
DT_850000	$ 2,695.02
DT_851000	$ 11,337.97
DT_853000	$ 4,224.60
DT_856000	$ 439,303.93
DT_857000	$ 65,710.13
DT_859000	$ 24,801.42
DT_860000	$ 6.60
DT_862000	$ 8,565.74
DT_863000	$ 58,975.70
DT_865000	$ 28,557.54
DT_867000	$ 12,874.77
DT_870000	$ 5,050,818.24
DT_871000	$ 723,666.93
DT_872000	$ 27,628.41
DT_874000	$ 4,172,017.73
DT_875000	$ 295,094.35
DT_876000	$ 129,211.29
DT_877000	$ 9,415.10
DT_878000	$ 894,196.72
DT_879000	$ 934,446.88
DT_880000	$ 4,906,658.17
DT_881000	$ 93,415.61
DT_885000	$ 651,543.36
DT_886000	$ 441,657.62
DT_887000	$ 2,013,356.31
DT_889000	$ 182,056.39
DT_890000	$ 114,529.99
DT_892000	$ 408,931.26
DT_893000	$ 420,508.20
DT_894000	$ 149,220.01
DT_901000	$ 992,511.90
DT_902000	$ 1,582,167.16
DT_903000	$ 6,067,725.44
DT_904000	$ 3,561,664.90
DT_905000	$ 576,647.98
DT_907000	$ 58,151.23
DT_908000	$ 2,710,891.08
DT_909N00	$ 792,858.49
DT_910N00	$ 461,166.58
DT_913N00	$ 41,635.64
DT_920000	$ 9,909,326.87
DT_921000	$ 4,127,759.87
DT_922000	$ (1,044,245.28)
DT_923000	$ 675,653.12
DT_924000	$ 76,482.00
DT_925000	$ 1,378,259.47
DT_926000	$ 7,477,277.22
DT_928000	$ 1,659,368.01
DT_930200	$ 602,313.94
DT_931000	$ 1,080,386.93
DT_932000	$ 269,976.22
Grand Total	**$ 65,581,615.27**

9.30.24 Summary

Row Labels	Sum of Sum Total Amt
DT_753000	$ (21,551.81)
DT_754000	$ 5,857.16
DT_756000	$ 9.44
DT_757000	$ 753.76
DT_759000	$ 183.63
DT_762000	$ 132.50
DT_764000	$ 998.87
DT_767000	$ 59.65
DT_769000	$ 471.40
DT_807200	$ 73,956.30
DT_807300	$ 15,692.54
DT_807500	$ 90,332.33
DT_812000	$ (18,891.55)
DT_850000	$ 4,010.26
DT_851000	$ 17,614.51
DT_853000	$ 12,085.41
DT_854000	$ 86.41
DT_856000	$ 574,214.04
DT_857000	$ 48,209.53
DT_859000	$ 42,343.67
DT_860000	$ 6.60
DT_862000	$ 3,377.53
DT_863000	$ 234,492.50
DT_864000	$ 21.20
DT_865000	$ 39,860.25
DT_867000	$ 20,851.24
DT_870000	$ 5,567,912.16
DT_871000	$ 728,215.19
DT_872000	$ 19,160.35
DT_873000	$ 60.08
DT_874000	$ 4,376,061.39
DT_875000	$ 289,791.59
DT_876000	$ 137,277.72
DT_877000	$ 3,298.06
DT_878000	$ 933,142.05
DT_879000	$ 850,970.09
DT_880000	$ 5,176,719.24
DT_881000	$ 96,596.69
DT_885000	$ 694,373.02
DT_886000	$ 392,960.66
DT_887000	$ 1,850,184.58
DT_888000	$ 294.95
DT_889000	$ 152,218.10
DT_890000	$ 65,488.45
DT_891000	$ 10,711.81
DT_892000	$ 458,672.67
DT_893000	$ 352,482.11
DT_894000	$ 201,648.16
DT_901000	$ 1,231,369.21
DT_902000	$ 1,573,405.50
DT_903000	$ 6,648,409.31
DT_904000	$ 3,082,512.36
DT_905000	$ 467,746.29
DT_907000	$ 66,425.47
DT_908000	$ 2,900,708.77
DT_909N00	$ 690,686.41
DT_910N00	$ 584,115.92
DT_913N00	$ 63,554.89
DT_920000	$ 10,683,894.79
DT_921000	$ 4,116,664.52
DT_922000	$ (1,104,035.22)
DT_923000	$ 563,243.46
DT_924000	$ 90,502.11
DT_925000	$ 1,726,667.03
DT_926000	$ 6,736,224.95
DT_928000	$ 1,470,000.57
DT_930200	$ 1,522,054.67
DT_931000	$ 1,138,689.02
DT_932000	$ 476,339.41
Grand Total	**$ 68,232,595.93**

9.30.25 Summary

Row Labels	Sum of Sum Total Amt
DT_750000	$ 23.80
DT_753000	$ 18,085.60
DT_754000	$ 3,792.09
DT_756000	$ 365.80
DT_757000	$ 713.73
DT_759000	$ (21.13)
DT_764000	$ 468.57
DT_765000	$ (255.83)
DT_766000	$ 45.55
DT_767000	$ 10.94
DT_769000	$ 3,186.79
DT_807200	$ 76,192.34
DT_807300	$ 11,807.54
DT_807500	$ 84,546.84
DT_812000	$ (37,576.41)
DT_850000	$ 3,277.70
DT_851000	$ 31,172.88
DT_853000	$ 9,093.16
DT_854000	$ 395.65
DT_856000	$ 615,691.14
DT_857000	$ 50,796.90
DT_859000	$ 48,688.55
DT_860000	$ 6.60
DT_861000	$ 58.00
DT_862000	$ 16,613.79
DT_863000	$ 130,538.04
DT_865000	$ 24,419.43
DT_867000	$ 15,041.17
DT_870000	$ 5,762,209.13
DT_871000	$ 710,165.01
DT_872000	$ 29,353.10
DT_874000	$ 4,161,472.26
DT_875000	$ 336,713.88
DT_876000	$ 108,185.92
DT_877000	$ 8,078.18
DT_878000	$ 931,255.01
DT_879000	$ 1,013,896.74
DT_880000	$ 5,452,566.84
DT_881000	$ 109,955.18
DT_885000	$ 719,451.59
DT_886000	$ 505,652.05
DT_887000	$ 1,514,068.80
DT_888000	$ 91.82
DT_889000	$ 184,670.16
DT_890000	$ 76,524.92
DT_892000	$ 332,207.35
DT_893000	$ 399,089.33
DT_894000	$ 135,312.49
DT_901000	$ 1,290,863.44
DT_902000	$ 1,626,214.79
DT_903000	$ 6,728,076.79
DT_904000	$ 4,375,851.43
DT_905000	$ 449,998.63
DT_907000	$ 110,888.43
DT_908000	$ 2,665,299.03
DT_909N00	$ 783,027.53
DT_910N00	$ 648,486.57
DT_913N00	$ 3,536.70
DT_920000	$ 12,895,841.77
DT_921000	$ 3,189,235.03
DT_922000	$ (1,291,537.83)
DT_923000	$ 681,500.08
DT_924000	$ 93,793.53
DT_925000	$ 1,657,648.61
DT_926000	$ 6,506,567.05
DT_928000	$ 1,603,421.04
DT_930200	$ 1,741,875.90
DT_931000	$ 1,205,612.09
DT_932000	$ 442,236.75
Grand Total	**$ 71,006,536.35**

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-I-Operating Expenses
Delivered on January 28, 2026

III-I.2

Request:

Provide a summary of claimed operating expenses for the HTY (with similar account breakdown to previously listed H.1), including annualizing and normalizing adjustments fully supported (including explanations, documentation and calculations) to arrive at adjusted future operating expenses for ratemaking, including supporting data for the FTY and the FPFTY.

Response:

For all benefit related operating expenses please refer to Exhibit No. MPW-1 Schedule 1 (Pages 1 and 2) and Schedule 2 (Pages 1-16). For the remainder of operating expenses, refer to National Fuel Exhibit ATF-1 which summarizes O&M expenses for the HTY, FTY, and the FPFTY. Additionally, National Fuel Exhibit ATF-2, ATF-3, and ATF-4 provide details on the adjustments for the FTY and FPFTY.

Prepared by or under the supervision of: Michael P. Weidner & Anthony Formato

National Fuel Gas Distribution Corporation
Docket No. R-2026-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-I-Operating Expenses
Delivered on January 28, 2026

III-I.3

Request:

List extraordinary property losses as a separate item, not included in operating expenses or depreciation and amortization (not included in cost of service when the gain or loss on this property has occurred or is likely to occur in the FTY or the FPFTY). Provide the proposed ratemaking treatment of extraordinary gains and losses. Provide supporting data including an explanation and breakdown of costs.

Response:

The Company has not incurred any extraordinary gains or losses during the HTY, FTY or FPFTY and has not included any extraordinary gains or losses in proposed rates.

Prepared by or under the supervision of: Michael J. Maggioli

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-I-Operating Expenses
Delivered on January 28, 2026

III-I.4

Request:

For the base rate case expense claim, provide all of the following:

III.I.4.a Detailed calculations of normalized base rate case expense, including supporting data for outside services rendered.
III.I.4.b Justification for the proposed normalization period for the current base rate case.
III.I.4.c Details and related dollar amounts by category of the base rate case expense claim. Include the actual billings or invoices and the applicable contracts in support of each category of base rate case expense.
III.I.4.d Docket numbers and filing dates, indicating fully litigated or settled, for the immediately preceding three base rate cases filed with the Commission.
III.I.4.e Details and related dollar amounts by category of the PUBLIC UTILITY'S actual RATE CASE expenses FOR BASE RATE CASES FILED WITH THE COMMISSION DURING THE preceding FOUR YEARS OR THE PRECEDING BASE RATE CASE, WHICHEVER IS GREATER.

Response:

a. Refer to National Fuel Exhibit ATF-2, Schedule 10.
b. The Company is proposing a 3-year normalization period based on the time between the Company's prior filing in October 2022 and this filing in January 2026.
c. Refer to National Fuel Exhibit ATF-2, Schedule 10. The Company will provide updated actuals as the case progresses. Information related to contracted rate case support is CONFIDENTIAL. The Company is providing CONFIDENTIAL Attachment III.I.4 in a separately sealed envelope that is marked "CONFIDENTIAL". The Company hereby requests that the content of such envelope be placed in the Commission's NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such CONFIDENTIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.
d. R-2022-3035730 filed October 28, 2022 – settled

   R-00061493 filed May 31, 2006 - settled

   R-00049656 filed Sept 15, 2004 – settled

e. Costs for the 2022 case are as follows:

External Consultants	$290,725
Legal	$296,444
Advertising/Other	$74,259
Total	$661,428

Prepared by or under the supervision of: Anthony Formato

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-I-Operating Expenses
Delivered on January 28, 2026

III-I.5

Request:

Provide a list by applicable industry's USoA of charges by affiliates (service corporations, and the like) to the public utility, grouped by the claimed operating expenses and capitalized amounts for the HTY, the 2 years immediately preceding the HTY, the FTY and the FPFTY. Include all of the following:

III.I.5.a Copy of contract(s) governing the services provided and charges, if any.
III.I.5.b Explanation of the nature of the services provided.
III.I.5.c Explanation of the basis on which charges are made.
III.I.5.d If charges are allocated to the public utility, identify the affiliate provider of the charges, allocation factors and dollar amounts used for all affiliated companies not receiving allocation and explain why there is no allocation.

Response:

III.I.5.a – Copy of Contract(s) Governing Services and Charges

The governing Service Agreement among National Fuel Gas Company and its affiliates is provided on pages 7–17 of the attached document.

Compliance Note: While the version provided does not display executed signature pages, this agreement is the operative version currently in effect and on file with the Pennsylvania Public Utility Commission. Executed copies are maintained internally. The omission of signatures does not alter the applicability or enforceability of the agreement for purposes of cost assignment and affiliate transactions.

III.I.5.b – Explanation of the Nature of Services Provided

Descriptions of affiliate services are included in Exhibit B – Cost Assignment and Allocation Manual, Section II (Affiliate Services) on pages 19–23. These descriptions cover regulated and non-regulated services.

III.I.5.c – Explanation of the Basis on Which Charges Are Made

Articles III and IV of the Service Agreement (pages 9–12) explain the principles for cost assignment and determination of charges. Exhibit C – Section VIII (Other Allocation Methods) on pages 24–31 details allocation factors and methodologies applied to clearing accounts.

III.I.5.d – Allocation Details and Non-Allocation Explanation

Affiliate providers, allocation factors, and methodologies are identified in Exhibit C (pages 24–31). The document also notes affiliates that do not currently provide services and explains why no allocation applies in those cases (page 23).

Affiliate Charges by USoA – HTY and Two Preceding Years

Detailed tables of charges to National Fuel Gas Distribution Corporation – Pennsylvania Division by USoA account, grouped into capitalized amounts and operating expenses are provided for:

Historic Test Year (HTY): Twelve months ended September 30, 2025 (pages 40–43)

Two immediately preceding years: Twelve months ended September 30, 2024 (pages 36–39) and September 30, 2023 (pages 32–35).

Affiliates covered: National Fuel Gas Supply Corporation, Empire Pipeline, National Fuel Gas Midstream Corporation, and National Fuel Gas Company.

Future Test Year (FTY) and Fully Projected Future Test Year (FPFTY)

For affiliate charge detail for the FTY and FPFTY, please refer to National Fuel Exhibits ATF-1 and ATF-4.

Prepared by or under the supervision of:
Michael J. Maggioli

National Fuel®

September 29, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
Harrisburg, Pennsylvania 17105-3265

Re: National Fuel Gas Distribution Corporation – Service Agreement with National Fuel Gas Company and Subsidiary Companies
Docket No. G-2025-

Dear Secretary Homsher:

Enclosed for filing on behalf of National Fuel Gas Distribution Corporation ("Distribution" or the "Company") is a revised Service Agreement between Distribution and National Fuel Gas Company ("National"), including certain subsidiaries of National. This Service Agreement is being filed pursuant to Chapter 21 of the Public Utility Code, 66 Pa. C.S. Ch. 21, governing relationships with affiliates.

The Company's currently existing Service Agreement was approved by the Pennsylvania Public Utility Commission ("Commission") on September 21, 2018, at Docket No. G-2018-3002838. Distribution is proposing to make changes to its existing Service Agreement as recommended in the Management and Operations Audit Docket No. D-2023-3040107. The proposed changes are to: (1) update the Service Agreement to include a description of permitted transfers of assets (new Article II of the proposed Service Agreement); and (2) revise the Service Agreement to add detail and terms consistent with National's Cost Assignment and Allocation Manual (the "Manual").

Regarding the addition of detail and terms consistent with the Manual, the Company proposes to replace the description of services found in Exhibit B of the existing Service Agreement with the description found in Section II of the Manual (entitled "Affiliate Services). The Company also proposes to add a new Exhibit C to the Service Agreement consisting of Section VIII of the Manual (entitled "Other Allocation Methods"), which sets forth factors and methodologies used for the allocation of indirect costs.

The proposed Service Agreement expands, consistent with the Manual, the terms governing assignment of costs (Article III of the proposed Service Agreement) and determination of cost (Article IV of the proposed Service Agreement). The proposed Service Agreement adds terms governing billing practices and, consistent with the Manual, addresses convenience payments

(Article V of the proposed Service Agreement). Finally, the proposed Service Agreement provides that the Company shall re-file the agreement with the Commission when subsidiaries are added as parties (Article VI of the proposed Service Agreement).

Clean and red-lined versions of the Service Agreement are provided in Attachment 1 hereto.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

James P. Baetzhold

James P. Baetzhold
Associate General Counsel

Enclosure

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL

Allison Kaster, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17105-3265

NazAarah Sabree
Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101-1923

Daryl Lawrence, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Dated this 29th day of September 2025.

James P. Baetzhold

Attachment 1

SERVICE AGREEMENT

AGREEMENT, dated as of the ___ day of _____, ____, among National Fuel Gas Company, a New Jersey corporation (“National”), and the undersigned subsidiaries of National.

WITNESSETH:

WHEREAS, National is a holding company that owns, directly or indirectly, voting securities of the undersigned subsidiary companies;

WHEREAS, National and the undersigned subsidiary companies are referred to herein as the National Fuel Gas System ("System"), which is organized for, and presently engaged primarily in, the business of exploring for, producing, storing, transporting, gathering, and distributing natural gas; and

WHEREAS, System companies desire, need and require from time to time the administrative, engineering and technical aid, assistance and advice of personnel experienced in the operation and management of natural gas and other properties who are employed by members of the System, and have agreed concerning the nature and extent of the assistance and service required, and the amounts to be paid as compensation therefor, and do hereby desire to evidence their agreement in writing;

NOW, THEREFORE, in consideration of the mutual covenants and undertakings herein contained, the parties hereto agree as follows:

ARTICLE I

SERVICES TO BE FURNISHED

National Fuel Gas Distribution Corporation (“Distribution Corporation”) or any of the other affiliated members of the System may from time to time perform, on a regular

or temporary basis, administrative, engineering, accounting, maintenance, management or other services, for one or more of the other companies in the System. Distribution Corporation and companies in the System that receive services from, or provide services to, Distribution Corporation are listed in Exhibit A to this Agreement. Descriptions of services are included in Section II of National's Cost Assignment and Allocation Manual, which section is filed as Exhibit B to this Agreement. In addition to the services listed in Exhibit B, National leases office space at its corporate headquarters, 6363 Main Street, Williamsville, NY (the "Main Office") to certain affiliates, and affiliates lease space to each other at various other offices, service centers and field locations.

Notwithstanding anything to the contrary in this Agreement, no System company may perform any service for any other System company in contravention of any applicable law, regulation, rule, order, judgment or decision of any governmental entity ("Applicable Laws"), including, without limitation, any Applicable Laws governing transactions or communications between utility companies and their affiliates or natural gas companies and their affiliates.

ARTICLE II

CERTAIN ASSET TRANSFERS

Distribution Corporation's Pennsylvania operating division (the "PA Division") may from time to time wish to transfer assets to, or receive assets from, Distribution Corporation's New York operating division (the "NY Division") or other affiliated members of the System. The PA Division may, pursuant to this agreement, participate in the following types of asset transfers: (i) emergency transfers, and (ii) non-

emergency transfers where the amount of consideration involved is not in excess of $10,000. Emergency transfers may occur, for example, to address breakdowns in vehicles, equipment, tools, systems or other assets, or to restore or ensure safe, reliable service in response to disruptions or other incidents or circumstances impacting service. With respect to non-emergency transfers permitted under this agreement, regularly recurring payments under a general or continuing arrangement which aggregate a greater annual amount shall not be broken down into a series of transactions each within the $10,000 limit.

The PA Division and its counterparties to transfers permitted under this agreement shall adjust their books in an appropriate manner to reflect such transfers.

Asset transfers in which the PA Division wishes to participate, other than those permitted under this agreement, require the prior written approval of the Pennsylvania Public Utility Commission, under Section 2102 of the Pennsylvania Public Utility Code.

ARTICLE III

ASSIGNMENT OF COSTS

In consideration of services rendered, the companies receiving such services agree to reimburse their share of the costs thereof, as it is the intention of this Agreement that the reimbursement for services rendered to System companies shall cover the costs of providing said services, including overhead expenses. Costs are assigned pursuant to the following guidelines:

1. To the maximum extent practical, costs that can be specifically attributed to a business unit are directly charged to that business unit. For example, labor costs,

inventory costs and vendor invoices that pertain to a specific business unit are charged to that unit.

2. Costs that cannot be directly charged are allocated to business units on the basis of a causal relationship where applicable, such as the level of activity within various business units, the level of output for each business unit, or the resources consumed by each business unit. The indirect costs are accumulated into clearing accounts or homogeneous pools and are allocated to various business units on the basis of such causal relationships. For example, for costs driven by the number of employees, the factor used to allocate the costs among affiliates is relative number of employees. As another example, for costs driven by computer connectivity to various systems through the System's intranet or mainframe, the factor used to allocate the costs among affiliates is relative number of computers. Factors and methodologies employed for the allocation of indirect costs are included in Section VIII of National's Cost Assignment and Allocation Manual, which section is filed as Exhibit C to this Agreement.

3. Remaining costs that are not associated with a specific, identifiable, causal relationship are pooled and allocated to business units on the basis of "common" factors. This allocation method is used for administrative and general costs related to common departments (those departments whose services benefit some or all affiliates). The costs are allocated across the affiliates based on a three-factor common expense formula. The three factors included in the formula are: net plant, operation and maintenance expense, and total throughput. The formula is updated annually on a fiscal basis using the prior year's fiscal results in the computation.

ARTICLE IV

DETERMINATION OF COST

In determining the cost to be assessed as provided in Article III, there shall be added to the salaries of all employees for whom service charges are to be made, a percentage sufficient to cover the general overhead associated with such personnel which will include an allowance for vacation and holiday pay, payroll taxes and all employee benefits. Unit hourly equipment costs shall be developed based on operating expenses, insurance, maintenance and depreciation costs attributable to each individual class of equipment. Costs of materials shall be computed based on the cost of the item as shown on the books of account of the individual company supplying the item plus the standard inventory overhead charge.

In making the foregoing calculations, no overhead shall be charged by National, and no general overhead of any System company shall be added to costs incurred for services of nonaffiliated consultants employed by such company.

For National's regulated utility affiliates, transactions with other regulated affiliates and payments of interest to National constitute a great majority of total affiliate transactions. For example, for the PA Division in calendar year 2024, transactions with the NY Division, transactions with National's regulated pipeline subsidiaries, and payments of interest to National collectively accounted for approximately 96% of total affiliate transactions. Interest payments by the PA Division and NY Division to National are made pursuant to (i) long-term notes issued by Distribution Corporation to National in accordance with orders of the Pennsylvania Public Utility Commission and New York Public Service Commission, and (ii) the corporate money pool agreement, which

provides that borrowers of short-term funds from the money pool pay interest to National in its capacity as administrator of the money pool.

Given the very high percentage of utility affiliate transactions that involve other regulated affiliates or payments of interest to National, National has, across all affiliate transactions, generally applied a fully distributed cost allocation methodology. National's use of fully distributed costs promotes efficiency in accounting for affiliate transactions and seeks to ensure that all parties to affiliate transactions receive fair treatment.

In consideration of the application of an asymmetric pricing principle to transactions between utility affiliates and non-regulated affiliates, common departments will periodically evaluate their services and consider the feasibility of market alternatives. These assessments will review various service aspects, including, for example, service descriptions and associated budgets; cost competitiveness for the services provided; metrics, goals and results related to the provision of service; agreed-upon service level expectations; service level performance in comparison to agreed-upon service levels; and consequences for not meeting service level expectations.

ARTICLE V

BILLING PRACTICES

As soon as practical after the last day of each month, or such other period as may be agreed upon by the respective companies, a billing shall be rendered for all amounts due for services and expenses for such period, computed pursuant to this Agreement. Bills shall identify services and expenses in reasonable detail and include itemized charges. Amounts billed shall be due and payable upon receipt. If an invoice

remains outstanding after 30 days, the service provider may assess interest upon the unpaid amount at a rate equal to 2% per annum above the Daily Rate, as calculated pursuant to National's then effective money pool agreement. The System companies shall keep their books and records available for inspection by representatives of the other companies and, upon request by any System company, shall furnish information required by such System company with respect to services rendered, the costs thereof and the allocation of such costs among the System companies.

Payments to third parties made by one affiliate on behalf of another affiliate are considered convenience or accommodation payments. Not to be confused with actual transactions between affiliates where a good, service or product is provided, convenience or accommodation payments occur when a single payment is made to a vendor that includes amounts for multiple entities. Affiliates on whose behalf a convenience or accommodation payment is made shall, within 30 days of receipt of an invoice with respect to such payment, reimburse the affiliate that made the payment.

ARTICLE VI

MISCELLANEOUS

This Agreement sets forth the System's general principles relating to the determination and allocation of costs among System companies.

This Agreement shall be in full force and effect as of the date first mentioned above, subject to any necessary approval of governmental agencies having jurisdiction over this matter.

National may from time to time consent to the addition of other subsidiaries as parties to this Agreement, including without limitation subsidiaries that may be formed or

acquired after the date hereof. With such consent, any such additional subsidiary shall become a party to this Agreement by executing a signature page hereto. Distribution Corporation shall re-file this Agreement with the PUC when subsidiaries are added.

This Agreement shall terminate with regard to any System company upon not less than ninety days written notice of termination from such company to the other System companies; provided, however, this Agreement shall terminate immediately with regard to any company as of the date such company ceases to be an affiliated member of the System.

This Agreement may be executed in counterparts, each of which shall be deemed an original, and all of which taken together shall constitute one instrument.

IN WITNESS WHEREOF, the parties have hereunto executed this Agreement as of the date first written above.

NATIONAL FUEL GAS COMPANY

By: _____
D. P. Bauer, President and Chief Executive Officer

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

By: _____
M. D. Colpoys, President

NATIONAL FUEL GAS SUPPLY CORPORATION

By: _____
J. N. Del Vecchio, President

EMPIRE PIPELINE, INC.

By: _____
J. N. Del Vecchio, President

PENNSYLVANIA GAS HOLDINGS CORPORATION

By: _____
J. I. Loweth, Vice President

SENECA RESOURCES COMPANY, LLC

By: _____
J. I. Loweth, President

HIGHLAND FIELD SERVICES, LLC

By: _____
J. I. Loweth, President

NATIONAL FUEL GAS MIDSTREAM COMPANY, LLC

By: _____
J. I. Loweth, President

NFG MIDSTREAM COVINGTON, LLC

By: _____
J. M. Morris, Manager

NFG MIDSTREAM PROCESSING, LLC

By: _____
J. M. Morris, Manager

NFG MIDSTREAM TROUT RUN, LLC

By: _____
J. M. Morris, Manager

NFG MIDSTREAM TIONESTA, LLC

By: _____
J. M. Morris, Manager

NFG MIDSTREAM CLERMONT, LLC

By: _____
J. M. Morris, Manager

LEIDY HUB, INC.

By: _____
_____, Senior Vice President

NATIONAL FUEL RESOURCES, INC.

By: _____
J. N. Del Vecchio, Vice President

EXHIBIT A

NATIONAL FUEL GAS SYSTEM COMPANIES

National Fuel Gas Company

National Fuel Gas Distribution Corporation

National Fuel Gas Supply Corporation

Empire Pipeline, Inc.

Pennsylvania Gas Holdings Corporation

Seneca Resources Company, LLC

Highland Field Services, LLC

National Fuel Gas Midstream Company, LLC

NFG Midstream Covington, LLC

NFG Midstream Processing, LLC

NFG Midstream Trout Run, LLC

NFG Midstream Tionesta, LLC

NFG Midstream Clermont, LLC

Leidy Hub, Inc.

National Fuel Resources, Inc.

EXHIBIT B

COST ASSIGNMENT AND ALLOCATION MANUAL

SECTION II AFFILIATE SERVICES

A. Affiliate Services Provided

NFG and its affiliated subsidiaries provide a variety of service amongst and between each other. Some services are directly related to the individual company's line of business, such as providing transportation or gas storage services. Other services take advantage of synergies such as operating employees maintaining closely located facilities of other companies. Additionally, there are administrative and general services, which are performed that benefit some or all of the affiliates. This would be true of Accounting, Human Resources, Audit Services, Finance and Corporate Communications.

REGULATED SERVICES:

Service	Provider	Recipient
Administrative	Distribution, Supply	All affiliates
Finance	Distribution	All affiliates
Human Resources	Distribution	All affiliates
Legal	Distribution, Supply	All affiliates
Gas Distribution	Distribution	3rd Party
Gas Measurement	Distribution, Supply	Distribution, Supply, Empire
Gas Transmission	Supply, Empire	Distribution, 3rd Party
Gas Storage	Supply, Empire	Distribution, Empire, 3rd Party
Gas Transportation	Distribution, Supply, Empire	3rd Party
Gas Gathering	Supply	Seneca
Gas Dispatch	Supply	Distribution, Supply, Empire
Operating & Maintenance	Distribution, Supply	All Affiliates

NON-REGULATED SERVICES:

Service	Provider	Recipient
Gas Gathering	Midstream	Seneca, 3rd Party
Gas Processing	Midstream	Seneca
Office Space rental	NFG Co.	Distribution, Supply, Midstream, Empire

B. Services Provided By NFG Co

DEPARTMENT	DESCRIPTION
Executive	Provide management services for all aspects of the business.
Financing	Provides financing for affiliates through issuance of commercial paper, bank lines of credit and equity. Additionally, monitors corporate credit rating and bank relationships.

C. Services Provided By NFGDC – NYD

DEPARTMENT	DESCRIPTION
Accounting	Provide accounting services to maintain the books and records of the company, provide financial reports and analysis, prepare statutory reports, provide accounting research, set accounting policy, maintain allocations and inter-company billings. Maintain the general ledger (GL) system.
Accounts Payable	Provide non-payroll disbursement processing and analysis including account distribution to the general ledger. Resolve problems associated with invoice processing and maintain the accounts payable system.
Asset Management	Provide services to maintain and manage plant accounting and depreciation for affiliate assets.
Audit Services	Perform audit services for management and the Board of Directors, assist external auditors, provide analysis and safeguard company assets.
Benefit Administration	Provide services to design, implement and administer employee benefit programs.
Budget	Develop and maintain an operating budget, provide management with variance reports and analysis. Provide training and instruction to budget preparers.
Cash Management	Provide services to plan, manage and maintain corporate cash flow, maintain the 'money pool', track miscellaneous billings and cash related items.
Corporate Communications	Provides services related to public and media relations, as well as communicating company information to employees and retirees.
Credit, Collections & Receivables Management	Provide services to maximize customer collections and reduce bad debt write-offs. Additionally, provide credit risk analysis of customers and marketers.
Engineering	Provide engineering service and support functions for pipelines and construction projects.
Executive	Provides management and administrative services related to the overall operation and direction of the affiliates.

DEPARTMENT	DESCRIPTION
Executive – Distribution	Provides management and administrative services related to the overall operation and direction of NFGDC.
Finance - General	Provides services to analyze, maintain and monitor corporate financing activities.
Financial Planning	Provide services to prepare, analyze and maintain the corporate earnings forecast, cash and financing needs.
Government Affairs	Provides services to monitor the political arena and maintain relationships with governmental institutions on a state and federal level.
Human Resources	Provide services to manage and maintain employee compensation policies, recruiting and training programs and worker's compensation and disability programs. Additionally, implement and maintain employee programs and statutory programs.
Information Technology	Provide services to manage, design, develop, implement, monitor and maintain information technologies, application systems, networks, mainframe, software, data security, data recovery and data backup.
Investor Relations	Develop and implement programs to educate and inform potential investors, and communicate information to current investors.
Land	Provide service related to facilities management and land support for operations and construction.
Legal	Provide service related to labor and employment law, litigation, contracts, environmental matters, financial reporting and advice on other legal matters.
Materials Management	Manage and maintain material inventories and material logistics. Additionally, monitor material requirements planning (MRP) activity and project material planning.
Payroll	Provide services related to wage distribution, including the distribution of accounting charges to the GL. Manage withholding liabilities and coordinate filing of statutory reports.
Purchasing	Provide services to procure material, equipment and services, analyze corporate spending and support the materials management function. Provide services to manage and maintain leasing activities and disposition of leased materials.
Rates & Regulatory Affairs	Provide services to manage regulatory activities and relationships for NFGDC. Manage, monitor and implement regulatory programs, provide direct support for customer pricing and billing, and develop sales and load forecasts.
Risk	Provide service related to Risk mitigation, Insurance, Environmental issues and compensation and damage claims.

DEPARTMENT	DESCRIPTION
Safety	Provides services to strengthen our safety culture and promote continuous improvement throughout the organization.
Security	Provide security services for company buildings, structures, work sites and personnel.
Tax	Provide services related to tax filing compliance requirements and perform research and consulting on tax issues.
Telecommunications	Provide services to design, implement, monitor and maintain telecommunication networks throughout the affiliates for voice, data, cellular and satellite communication.
Operating & Maintenance – Distribution	Provides service to operate and maintain lines, including changing charts, servicing valves and meters, and other routine maintenance.
Operating & Maintenance – Transmission	Performs routine maintenance and operating functions on transmission lines of affiliates.

D. Services Provided By NFGDC - PAD

DEPARTMENT	DESCRIPTION
Corporate Communications	Provides services related to public and media relations, as well as communicating company information to employees and retirees.
Engineering	Provide engineering service and support functions for pipelines and construction projects.
Executive – Distribution	Provides management and administrative services related to the overall operation and direction of NFGDC.
Government Affairs	Provides services to monitor the political arena and maintain relationships with governmental institutions on a state and federal level.
Human Resources	Provide services to manage and maintain employee compensation policies, recruiting and training programs and worker's compensation and disability programs. Additionally, implement and maintain employee programs and statutory programs.
Land	Provide service related to facilities management and land support for operations and construction.
Legal	Provide service related to labor and employment law, litigation, contracts and advice on other legal matters.
Risk	Provide service related to Risk mitigation, Insurance, Environmental issues and compensation and damage claims.

Safety	Provides services to strengthen our safety culture and promote continuous improvement throughout the organization.
Security	Provide security services for company buildings, structures, work sites and personnel.
Operating & Maintenance – Distribution	Provides service to operate and maintain distribution lines for NYD, including changing charts, servicing valves and meters, and other routine maintenance.
Operating & Maintenance – Gathering	Performs routine maintenance and operating functions on gathering lines of affiliates.
Operating & Maintenance – Transmission	Performs routine maintenance and operating functions on transmission lines of affiliates.

E. Services Provided By NFGSC

DEPARTMENT	DESCRIPTION
Commercial Services	Provides marketing services for pipeline affiliates.
Engineering	Provide engineering service and support functions for pipelines and construction projects.
Executive – Supply	Provides management and administrative services related to the overall operation and direction of NFGSC.
Land	Provide service related to facilities management and land support for operations and construction.
Legal	Provides legal services for NFGSC and Empire.
Regulatory	Provides regulatory services for Empire.
Operating & Maintenance – Distribution	Provides service to operate and maintain distribution lines of affiliates, including changing charts, servicing valves and meters, and other routine maintenance.
Operating & Maintenance – Gathering	Performs routine maintenance and operating functions on gathering lines of affiliates.
Operating & Maintenance – Transmission	Performs routine maintenance and operating functions on transmission lines of Empire.

F. Services Provided By Midstream

SERVICE	DESCRIPTION
Gathering Service	Provides natural gas gathering services for Seneca Resources.
Gas Processing	Provides natural gas processing services for Seneca Resources.

Note: Leidy Hub and NFR do not provide services to the other affiliates at this time. As previously mentioned, the August 1, 2020 sale of NFR's commercial and industrial contracts and certain other assets combined with the turn back of NFR's residential customers to Distribution Corporation has effectively ended NFR's operations.

EXHIBIT C

COST ASSIGNMENT AND ALLOCATION MANUAL

SECTION VIII OTHER ALLOCATION METHODS

A. Allocation Factors

When costs cannot be directly charged to an affiliate company, an allocation is used to apply the accounting charges. Since many costs are shared between the affiliates, it is important to ensure that the costs are applied fairly.

While the Common Cost Allocation Methodology is used for more of the administrative and general or governance costs, NFG employs various other methods to allocate costs between and among affiliates. These allocations are based on factors that are more causative in nature. The following is a list of the various factors employed:

A	Number of customers	For costs driven by the number of Utility Customers, the ratio of customers between NYD and PAD is used.
B	Number of customer bills	For costs driven by the number of Utility Bills, the ratio of bills between NYD and PAD is used.
C	Ratio of Throughput	For gas supply administration costs between NYD and PAD.
D	Ratio of Transportation Sales	For costs related to transportation activities, the ratio of transportation sales between NYD and PAD will be used.
E	Ratio of Meters – Small	For costs related to the maintenance of small and large meters, the factor is based on the number of meters worked on by state.
F	Ratio of Meters – Large	For costs related to the maintenance of small and large meters, the factor is based on the number of meters worked on by state.
G	Percentage of IS Analyst Time Used	For IS labor costs, time is collected and then a percentage is calculated based on the work performed.
H	Number of Temperature Correctors	For costs related to the maintenance of pressure and temperature correctors, the allocation is based on the percentage of pressure and temperature correctors in the field.
I	Number of Pressure Relief Valves	For costs related to the maintenance of regulators and pressure reliefs, the factor is based on the percentage of regulators and pressure reliefs in the field.

J	Number of Employees	For costs driven by number of employees receiving the services or benefits of the department's activities.
K	Number of Messenger Stops	For messenger service costs, a ratio based on the number of messenger stops is used.
L	Number of Computers	For costs driven by computer connectivity to various systems through the NFG intranet.
M	Number of Telecommunication Basic Licenses	For telecom costs driven by connectivity to the telecom system.
N	Number of Internet connection ports.	For costs driven by computer connectivity to various systems through the NFG intranet.
O	Square footage	For costs driven by the square footage by department at the Main Office making use of the service or equipment, or costs driven by square footage occupied by affiliates at other shared locations.
P	Placement after Training	For costs related to HR rotators during their rotation.
Q	Time study, meter study, invoice analysis and shipper volume schedules for throughput	For gas measurement expense for Supply and Empire.

B. Methodology Application

The following table contains information regarding the current clearing accounts, their home business unit (BU) and the methodology used to allocate the costs:

1. Information Technology:

These are the costs to operate and maintain the Information Technology department and the various computer networks and systems. In the case of account 184150, the costs are related to capital additions and will be charged to capital accounts in the various subsidiaries.

Account	BU	Cost To Be Allocated	Allocation Methodology
184140	DNYG1	Information Technology expenses, which includes labor and benefits.	Costs are allocated based on analyst hours charged to various IT time reporting groups.
184170	DNYG1	Information Technology Network costs, which include labor, benefits, professional service provider (PCI), equipment leases, maintenance agreements, telecommunication costs, utilities and other miscellaneous costs.	Costs are allocated based on a percentage of system connections, including PCs and Tough books.
184150	DNYG1	Information Technology costs primarily related to the roll-out of new computer equipment or software (such as a new firewall) that will be capitalized across the subsidiaries.	Costs are allocated based on a percentage of system connections for each subsidiary.

2. Telecommunications:

These are the various costs of operating and maintaining the Company's telecommunication and data network. Costs include labor, contractor charges, maintenance agreements, leased lines and equipment and various other charges related to providing service.

Account	BU	Cost To Be Allocated	Allocation Methodology
184430	DNYG1	Telecom Costs for Phone Usage & Equipment	Costs are allocated based on a count of all computing devices used for telecom purposes. That is PC hardware (including PC's, laptops tablets, etc.), cellular devices, and desk phones. All device counts were applied to the companies that use them. The totals for each company then determine the new percentage allocation when compared to the overall count.
184435	DNYG1	Telecom - Tie Lines & Wats	Costs are allocated based on a count of all computing devices used for telecom purposes. That is PC hardware (including PC's, laptops tablets, etc.), cellular devices, and desk phones. All device counts were applied to the companies that use them. The totals for each company then determine the new percentage allocation when compared to the overall count.
184445	DNYG1	Telecom - Remote Terminal Usage	Costs are allocated based on a count of all computing devices used for telecom purposes. That is PC hardware (including PC's, laptops tablets, etc.), cellular devices, and desk phones. All device counts were applied to the companies that use them. The totals for each company then determine the new percentage allocation when compared to the overall count.

Account	BU	Cost To Be Allocated	Allocation Methodology
184450	DNYG1	Telecom - Pa Phone Use & Equipment	Costs are allocated based on a count of all computing devices used for telecom purposes. That is PC hardware (including PC's, laptops tablets, etc.), cellular devices, and desk phones. All device counts were applied to the companies that use them. The totals for each company then determine the new percentage allocation when compared to the overall count.
184455	DNYG1	Telecom - MSW	Costs are allocated based on a count of all computing devices used for telecom purposes. That is PC hardware (including PC's, laptops tablets, etc.), cellular devices, and desk phones. All device counts were applied to the companies that use them. The totals for each company then determine the new percentage allocation when compared to the overall count.
184460	DNYG1	Telecom - Erie SC	Costs are allocated based on a count of all computing devices used for telecom purposes. That is PC hardware (including PC's, laptops tablets, etc.), cellular devices, and desk phones. All device counts were applied to the companies that use them. The totals for each company then determine the new percentage allocation when compared to the overall count.

3. Messenger Expense:

These are costs related to the delivery of material and mail between NFG locations.

Account	BU	Cost To Be Allocated	Allocation Methodology
184300	DNYG1	Messenger Expense	Costs are allocated on the basis of number of messenger stops.
184300	DPAG1	Messenger Expense	Costs are allocated on the basis of number of messenger stops.
184300	SUPG1	Messenger Expense	Costs are allocated on the basis of number of messenger stops.

4. Meter Shop:

These are the costs related to maintaining the various meters and metering equipment used by affiliates.

Account	BU	Cost To Be Allocated	Allocation Methodology
184700	DNYG1	Meter Shop expenses – Regulators and Pressure Relief, includes labor, benefits, materials, repair parts	Costs are allocated based on the percentage of regulators and pressure reliefs in the field.
184705	DNYG1	Meter Shop expenses – Temperature corrector, includes labor, benefits, materials, repair parts	Costs are allocated based on the percentage of pressure and temperature connectors in the field.
184707	DNYG1	Meter Shop expenses – general shop / warehousing, includes labor, benefits, materials, repair parts	Costs are allocated based on the average of the percentages of the small and large meter programs plus temperature correction and meter regulators.
184710	DNYG1	Meter Shop expenses – small meter, includes labor, benefits, materials, repair parts	Costs are allocated based on the meters worked on by state in prior 12 months.
184720	DNYG1	Meter Shop expenses – large meter, includes labor, benefits, materials, repair parts	Costs are allocated based on the meters worked on by state in prior 12 months.

5. Miscellaneous Customer Services:

These are costs related to producing and mailing bills to customers.

Account	BU	Cost To Be Allocated	Allocation Methodology
184240	DNYG1	Customer Billing	Costs are allocated based on the ratio of customer bills between NYD & PAD.
184245	DNYG1	Customer Postage	Costs are allocated based on postage usage.

6. Supply Services:

The following are costs related to the movement of gas through the pipeline network.

Account	BU	Cost To Be Allocated	Allocation Methodology
184220	SUPG1	Gas Measurement Expenses, including labor, benefits, and contractor and office expenses.	Costs are allocated based on departmental labor hours. Study performed by department.
184250	SUPG1	Gas Supply Administration, including labor, benefits, and contractor and office expenses.	Costs are allocated based on a rolling three-year average of the throughput of Distribution NY and Distribution PA.
184270	SUPG1	Gas Control including labor, benefits, and contractor and office expenses.	Costs are allocated based on departmental labor hours. Study performed by department.

7. Miscellaneous Services:

These are costs related to the shared use of the mail, print and copy rooms throughout the main office, and also the cost of confidential document destruction.

Account	BU	Cost To Be Allocated	Allocation Methodology
184617	DNYG1	MPC Room Clearing	Costs are allocated based on the number of employees at 6363 Main St
184618	DNYG1	Certified Document Destruction	Costs are allocated based on the number of employees at 6363 Main St

8. Human Resources Management Trainees

These costs are related to the labor, benefits loads, and office supplies for the employees participating in the Management Trainee program. The employees use one home department but work in various departments throughout the company. At the end of the two years, employees are assigned a permanent work location and begin recording expense under that department ID.

Department	BU	Cost To Be Allocated	Allocation Methodology
1457	DNYG1	HR Management Trainees	Costs are allocated based on historical placement of employees upon completion of two-year program

CHARGES TO NATIONAL FUEL GAS DISTRIBUTION CORPORATION FROM
NATIONAL FUEL GAS SUPPLY CORPORATION
TWELVE MONTHS ENDED September 30, 2023
PENNSYLVANIA DIVISION

ACCOUNT	FUNCTION	BASIS OF CHARGE	AMOUNT
	Capital		
107000	CWIP	Actual	$ 990,612
108000	Accumulated Depreciation	Actual	69,333
	Operating		
401200	Natural Gas Production	Actual	519
401300	Gas Supplies	Actual & *Allocation	125,274
401400	Storage	Actual	-
401500	Transmission	Actual	110,081
401600	Distribution	Actual	1,451,027
401700	Customer Accounts	Actual	42,891
401800	Customer Service	Actual	66,162
401900	Administrative & General	Actual & ^Allocation	1,466,330
	Maintenance		
402200	Natural Gas Production	Actual	1,086
402300	Gas Supplies	Actual	-
402400	Storage	Actual	-
402500	Transmission	Actual	161,502
402600	Distribution	Actual	224,354
402900	Administrative & General	Actual	40,937
			$ 4,750,109

*Allocated based on total throughput
^Allocated based on area of responsibility

CHARGES TO NATIONAL FUEL GAS DISTRIBUTION CORPORATION FROM
EMPIRE PIPELINE
TWELVE MONTHS ENDED September 30, 2023
PENNSYLVANIA DIVISION

ACCOUNT	FUNCTION	BASIS OF CHARGE	AMOUNT
	Capital		
107000	CWIP	Actual	$ -
108000	Accumulated Depreciation	Actual	-
	Operating		
401200	Natural Gas Production	Actual	-
401300	Gas Supplies	Actual	-
401400	Storage	Actual	-
401500	Transmission	Actual	-
401600	Distribution	Actual	-
401700	Customer Accounts	Actual	-
401800	Customer Service	Actual	-
401900	Administrative & General	Actual	-
	Maintenance		
402200	Natural Gas Production	Actual	-
402300	Gas Supplies	Actual	-
402400	Storage	Actual	-
402500	Transmission	Actual	-
402600	Distribution	Actual	-
402900	Administrative & General	Actual	477
			$ 477

CHARGES TO NATIONAL FUEL GAS DISTRIBUTION CORPORATION FROM
NATIONAL FUEL GAS MIDSTREAM CORPORATION
TWELVE MONTHS ENDED September 30, 2023
PENNSYLVANIA DIVISION

ACCOUNT	FUNCTION	BASIS OF CHARGE	AMOUNT
	Capital		
107000	CWIP	Actual	$ 13,788
108000	Accumulated Depreciation	Actual	-
	Operating		
401200	Natural Gas Production	Actual	-
401300	Gas Supplies	Actual	-
401400	Storage	Actual	-
401500	Transmission	Actual	-
401600	Distribution	Actual	6,932
401700	Customer Accounts	Actual	-
401800	Customer Service	Actual	-
401900	Administrative & General	Actual & ^Allocation	17,513
	Maintenance		
402200	Natural Gas Production	Actual	-
402300	Gas Supplies	Actual	-
402400	Storage	Actual	-
402500	Transmission	Actual	-
402600	Distribution	Actual	1,125
402900	Administrative & General	Actual	462
			$ 39,820

^Allocated based on area of responsibility

CHARGES TO NATIONAL FUEL GAS DISTRIBUTION CORPORATION FROM
NATIONAL FUEL GAS COMPANY
TWELVE MONTHS ENDED September 30, 2023
PENNSYLVANIA DIVISION

ACCOUNT	FUNCTION	BASIS OF CHARGE	AMOUNT
	Capital		
107000	CWIP	Actual	$ -
108000	Accumulated Depreciation	Actual	-
	Operating		
401200	Natural Gas Production	Actual	-
401300	Gas Supplies	Actual	-
401400	Storage	Actual	-
401500	Transmission	Actual	-
401600	Distribution	Actual	462
401700	Customer Accounts	Actual	-
401800	Customer Service	Actual	-
401900	Administrative & General	Actual	49,903
	Maintenance		
402200	Natural Gas Production	Actual	-
402300	Gas Supplies	Actual	-
402400	Storage	Actual	-
402500	Transmission	Actual	-
402600	Distribution	Actual	-
402900	Administrative & General	Actual	-
			$ 50,365

CHARGES TO NATIONAL FUEL GAS DISTRIBUTION CORPORATION FROM
NATIONAL FUEL GAS SUPPLY CORPORATION
TWELVE MONTHS ENDED September 30, 2024
PENNSYLVANIA DIVISION

ACCOUNT	FUNCTION	BASIS OF CHARGE	AMOUNT
	Capital		
107000	CWIP	Actual	$ 1,299,087
108000	Accumulated Depreciation	Actual	102,357
	Operating		
401200	Natural Gas Production	Actual	-
401300	Gas Supplies	Actual & *Allocation	107,237
401400	Storage	Actual	-
401500	Transmission	Actual	121,326
401600	Distribution	Actual & ^Allocation	1,443,540
401700	Customer Accounts	Actual	34,254
401800	Customer Service	Actual	62,151
401900	Administrative & General	Actual & ^Allocation	1,555,691
	Maintenance		
402200	Natural Gas Production	Actual	359
402300	Gas Supplies	Actual	-
402400	Storage	Actual	-
402500	Transmission	Actual	74,484
402600	Distribution	Actual	273,725
402900	Administrative & General	Actual	52,997
			$ 5,127,207

*Allocated based on total throughput
^Allocated based on area of responsibility

CHARGES TO NATIONAL FUEL GAS DISTRIBUTION CORPORATION FROM
EMPIRE PIPELINE
TWELVE MONTHS ENDED September 30, 2024
PENNSYLVANIA DIVISION

ACCOUNT	FUNCTION	BASIS OF CHARGE	AMOUNT
	Capital		
107000	CWIP	Actual	$ 1,700
108000	Accumulated Depreciation	Actual	-
	Operating		
401200	Natural Gas Production	Actual	-
401300	Gas Supplies	Actual	-
401400	Storage	Actual	-
401500	Transmission	Actual	-
401600	Distribution	Actual	-
401700	Customer Accounts	Actual	-
401800	Customer Service	Actual	-
401900	Administrative & General	Actual	281
	Maintenance		
402200	Natural Gas Production	Actual	-
402300	Gas Supplies	Actual	-
402400	Storage	Actual	-
402500	Transmission	Actual	-
402600	Distribution	Actual	-
402900	Administrative & General	Actual	-
			$ 1,981

CHARGES TO NATIONAL FUEL GAS DISTRIBUTION CORPORATION FROM
NATIONAL FUEL GAS MIDSTREAM CORPORATION
TWELVE MONTHS ENDED September 30, 2024
PENNSYLVANIA DIVISION

ACCOUNT	FUNCTION	BASIS OF CHARGE	AMOUNT
	Capital		
107000	CWIP	Actual	$ 4,539
108000	Accumulated Depreciation	Actual	-
	Operating		
401200	Natural Gas Production	Actual	-
401300	Gas Supplies	Actual	-
401400	Storage	Actual	-
401500	Transmission	Actual	-
401600	Distribution	Actual	2,767
401700	Customer Accounts	Actual	-
401800	Customer Service	Actual	-
401900	Administrative & General	Actual & ^Allocation	11,335
	Maintenance		
402200	Natural Gas Production	Actual	-
402300	Gas Supplies	Actual	-
402400	Storage	Actual	-
402500	Transmission	Actual	-
402600	Distribution	Actual	-
402900	Administrative & General	Actual	-
			$ 18,641

^Allocated based on area of responsibility

CHARGES TO NATIONAL FUEL GAS DISTRIBUTION CORPORATION FROM
NATIONAL FUEL GAS COMPANY
TWELVE MONTHS ENDED September 30, 2024
PENNSYLVANIA DIVISION

ACCOUNT	FUNCTION	BASIS OF CHARGE	AMOUNT
	Capital		
107000	CWIP	Actual	$ -
108000	Accumulated Depreciation	Actual	-
	Operating		
401200	Natural Gas Production	Actual	-
401300	Gas Supplies	Actual	-
401400	Storage	Actual	-
401500	Transmission	Actual	-
401600	Distribution	Actual	-
401700	Customer Accounts	Actual	-
401800	Customer Service	Actual	-
401900	Administrative & General	Actual	50,607
	Maintenance		
402200	Natural Gas Production	Actual	-
402300	Gas Supplies	Actual	-
402400	Storage	Actual	-
402500	Transmission	Actual	-
402600	Distribution	Actual	-
402900	Administrative & General	Actual	-
			$ 50,607

CHARGES TO NATIONAL FUEL GAS DISTRIBUTION CORPORATION FROM
NATIONAL FUEL GAS SUPPLY CORPORATION
TWELVE MONTHS ENDED September 30, 2025
PENNSYLVANIA DIVISION

ACCOUNT	FUNCTION	BASIS OF CHARGE	AMOUNT
	Capital		
107000	CWIP	Actual	$ 1,734,864
108000	Accumulated Depreciation	Actual	82,432
	Operating		
401200	Natural Gas Production	Actual	883
401300	Gas Supplies	Actual & *Allocation	102,049
401400	Storage	Actual	-
401500	Transmission	Actual	196,095
401600	Distribution	Actual & ^Allocation	1,379,372
401700	Customer Accounts	Actual	31,149
401800	Customer Service	Actual	65,193
401900	Administrative & General	Actual & ^Allocation	1,633,320
	Maintenance		
402200	Natural Gas Production	Actual	622
402300	Gas Supplies	Actual	-
402400	Storage	Actual	-
402500	Transmission	Actual	49,478
402600	Distribution	Actual	232,162
402900	Administrative & General	Actual	54,715
			$ 5,562,334

*Allocated based on total throughput
^Allocated based on area of responsibility

CHARGES TO NATIONAL FUEL GAS DISTRIBUTION CORPORATION FROM
EMPIRE PIPELINE
TWELVE MONTHS ENDED September 30, 2025
PENNSYLVANIA DIVISION

ACCOUNT	FUNCTION	BASIS OF CHARGE	AMOUNT
	Capital		
107000	CWIP	Actual	$ -
108000	Accumulated Depreciation	Actual	-
	Operating		
401200	Natural Gas Production	Actual	-
401300	Gas Supplies	Actual	-
401400	Storage	Actual	-
401500	Transmission	Actual	-
401600	Distribution	Actual	-
401700	Customer Accounts	Actual	-
401800	Customer Service	Actual	-
401900	Administrative & General	Actual	-
	Maintenance		
402200	Natural Gas Production	Actual	-
402300	Gas Supplies	Actual	-
402400	Storage	Actual	-
402500	Transmission	Actual	-
402600	Distribution	Actual	22
402900	Administrative & General	Actual	-
			$ 22

CHARGES TO NATIONAL FUEL GAS DISTRIBUTION CORPORATION FROM
NATIONAL FUEL GAS MIDSTREAM CORPORATION
TWELVE MONTHS ENDED September 30, 2025
PENNSYLVANIA DIVISION

ACCOUNT	FUNCTION	BASIS OF CHARGE	AMOUNT
	Capital		
107000	CWIP	Actual	$ 5,439
108000	Accumulated Depreciation	Actual	3,162
	Operating		
401200	Natural Gas Production	Actual	-
401300	Gas Supplies	Actual	-
401400	Storage	Actual	-
401500	Transmission	Actual	-
401600	Distribution	Actual	1,168
401700	Customer Accounts	Actual	-
401800	Customer Service	Actual	-
401900	Administrative & General	Actual & ^Allocation	4,613
	Maintenance		
402200	Natural Gas Production	Actual	-
402300	Gas Supplies	Actual	-
402400	Storage	Actual	-
402500	Transmission	Actual	-
402600	Distribution	Actual	-
402900	Administrative & General	Actual	-
			$ 14,382

^Allocated based on area of responsibility

CHARGES TO NATIONAL FUEL GAS DISTRIBUTION CORPORATION FROM
NATIONAL FUEL GAS COMPANY
TWELVE MONTHS ENDED September 30, 2025
PENNSYLVANIA DIVISION

ACCOUNT	FUNCTION	BASIS OF CHARGE	AMOUNT
	Capital		
107000	CWIP	Actual	$ 405
108000	Accumulated Depreciation	Actual	-
	Operating		
401200	Natural Gas Production	Actual	-
401300	Gas Supplies	Actual	-
401400	Storage	Actual	-
401500	Transmission	Actual	-
401600	Distribution	Actual	-
401700	Customer Accounts	Actual	-
401800	Customer Service	Actual	-
401900	Administrative & General	Actual	56,989
	Maintenance		
402200	Natural Gas Production	Actual	-
402300	Gas Supplies	Actual	-
402400	Storage	Actual	-
402500	Transmission	Actual	-
402600	Distribution	Actual	-
402900	Administrative & General	Actual	-
			$ 57,394

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-I-Operating Expenses
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III-I.6

Request:

For the HTY, the FTY and the FPFTY, describe costs relative to leasing equipment, computer rentals, and office space, including terms and conditions of the lease (including but not limited to, beginning and end date(s) of lease(s), monthly or annual dollar amount of payment(s)) and copies of contracts for each. Explain the method of calculating monthly or annual payments. If allocated from the parent company or an affiliated company, provide an explanation and supporting documentation for the method of allocation.

Response:

Information related to fund availability arrangements is CONFIDENTIAL. The Company is providing CONFIDENTIAL Attachment III.I.6 pages 6 through I06 in a separately sealed envelope that is marked "CONFIDENTIAL". The Company hereby requests that the content of such envelope be placed in the Commission's NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such CONFIDENTIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.

Please see Attachment III.I.6 as follows:

HTY, FTY and FPFTY describe costs relative to leasing equipment, computer rentals, and office space, including terms and conditions of the lease (including but not limited to, beginning and end date(s) of lease(s), monthly or annual dollar amount of payment(s))

Costs for HTY, FTY and FPFTY are presented on pages 2-4 of the attached document.

Copies of contracts for each

Contracts for each lease are included on pages 6-106, while a summary of contracts is available on page 5 of the attached document.

Explain the method of calculating monthly or annual payments. If allocated from the parent company or an affiliated company, provide an explanation and supporting documentation for the method of allocation

The method of calculating monthly or annual payments are presented on pages 2-4 of the

attached document. The amounts presented are exclusive of National Fuel Gas Distribution Corporation (Pennsylvania Division) and are not allocated to or from the parent company or an affiliated company.

Prepared by or under the supervision of:

Michael J. Maggiol

National Fuel Gas Distribution Corporation
Pennsylvania Division
Costs Relative to Leasing Equipment, Computer Rental, and Office Space
12 Months Ended 9/30/2025

	Annual Expense	Method of Computing Payment	Terms of Lease or Rental Agreements
Land	$ 29,580.31	Monthly payments per lease or rental agreements	2020-2050
Office Space	18,315.57	Monthly payments per lease or rental agreements	Auto-renews annually
Office Equipment	967.12	Monthly payments per lease or rental agreements	Auto-renews monthly
	$ 48,863.00		

Footnotes:

The balances above include both long-term (12 months or more) and short-term (12 months or less) leases and rental agreements.

Method of Computing Payments for HTY: Monthly or annual payments are determined in accordance with the rate schedule in the prior executed agreement.

Terms of Lease or Rental Agreements HTY: Certain agreements reached the end of their initial term and continue under auto-renewal provisions (monthly or annual) in the absence of newly executed contracts. For these items, the "Terms of Lease or Rental Agreements" column indicates "auto-renews monthly" or "auto-renews annually," and we have provided the last executed agreement.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Costs Relative to Leasing Equipment, Computer Rental, and Office Space
12 Months Ended 9/30/2026

	Annual Expense	Method of Computing Payment	Terms of Lease or Rental Agreements
Land	$ 29,580.31	Monthly payments per lease or rental agreements	2020-2050
Office Space	18,315.57	Monthly payments per lease or rental agreements	Auto-renews annually
Office Equipment	967.12	Monthly payments per lease or rental agreements	Auto-renews monthly
	$ 48,863.00		

Footnotes:

The balances above include both long-term (12 months or more) and short-term (12 months or less) leases and rental agreements.

Method of Computing Payments for FTY: Monthly or annual payments are determined in accordance with the rate schedule in the prior executed agreement.

Terms of Lease or Rental Agreements FTY: Certain agreements reached the end of their initial term and continue under auto-renewal provisions (monthly or annual) in the absence of newly executed contracts. For these items, the “Terms of Lease or Rental Agreements” column indicates “auto-renews monthly” or “auto-renews annually,” and we have provided the last executed agreement.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Costs Relative to Leasing Equipment, Computer Rental, and Office Space
12 Months Ended 10/31/2027

	Annual Expense	Method of Computing Payment	Terms of Lease or Rental Agreements
Land	$ 29,580.31	Monthly payments per lease or rental agreements	2020-2050
Office Space	18,315.57	Monthly payments per lease or rental agreements	Auto-renews annually
Office Equipment	967.12	Monthly payments per lease or rental agreements	Auto-renews monthly
	$ 48,863.00		

Footnotes:

The balances above include both long-term (12 months or more) and short-term (12 months or less) leases and rental agreements.

Method of Computing Payments for FPFTY: Monthly or annual payments are determined in accordance with the rate schedule in the prior executed agreement.

Terms of Lease or Rental Agreements FPFTY: Certain agreements reached the end of their initial term and continue under auto-renewal provisions (monthly or annual) in the absence of newly executed contracts. For these items, the "Terms of Lease or Rental Agreements" column indicates "auto-renews monthly" or "auto-renews annually," and we have provided the last executed agreement.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Adoption of ASC 842 - Leases
Final Lease Population Summary as of December 31, 2025

Lease Name	Lease Asset Type		Terms of Lease or Rental Agreements	Page(s)
Butler Communication Tower	Land		8/1/2025 - 7/31/2030	6-7
Crawford Communication Tower	Land		11/1/2024 - 10/31/2029	8-21
Erie Communication Tower	Land		10/11/2024 - 10/10/2029	22-34
Jefferson Communication Tower	Land	*	Auto-renews annually	35-53
Jefferson Communication Tower-Intercompany	Land	*	Auto-renews annually	54-58
McKean Communication Tower	Land	*	Auto-renews annually	59-66
Mercer Communication Tower	Land	*	Auto-renews every five years	67-69
Woodcock Creek Lake	Land		4/28/2020 - 4/27/2050	70-83
Pennsylvania Place - Harrisburg Office	Office Space	*	Auto-renews annually	84-91
Postage Meter - Erie, PA	Office Equipment	*	Auto-renews monthly	92-106

Footnotes:

* Terms of Lease or Rental Agreements: Certain agreements reached the end of their initial term and continue under auto-renewal provisions (monthly, annually or every five years) in the absence of newly executed contracts. For these items, the “Terms of Lease or Rental Agreements” column indicates the periodicity of auto renewal and we have provided the last executed agreement.

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III-I.7

Request:

For the HTY, the 2 years immediately preceding the HTY, the FTY and the FPFTY, provide detailed calculations of the cost by year resulting from storm damage. Explain the method and basis for estimates.

Response:

The Company has not experienced any storm damage costs in the HTY, FTY or FPFTY and has not included any storm damage costs in proposed rates.

Prepared by or under the supervision of: Michael J. Maggioli

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III-I.8

Request:

For the HTY, the 2 years immediately preceding the HTY, the FTY and the FPFTY, submit schedules showing, by applicable industry's USoA, the claimed expenses incurred in all of the following expense categories:

III.I.8.a Miscellaneous general expenses
III.I.8.b Outside service expense
III.I.8.c Regulatory commission expenses
III.I.8.d Advertising expenses broken down by category for claimed amounts, including but not limited to advertising engaged in by trade associations whenever the public utility has claimed a contribution to the trade association as a ratemaking claim. Explain the basis for recovery.

III.I.8.e Research and development expenses, showing a list of major projects.
III.I.8.f Charitable and civic contributions, by recipient and amount, showing types of social and service organization memberships paid for, the cost thereof, the accounting and tax treatment, and whether included in above-the-line claimed expenses. Explain the basis for recovery.
III.I.8.g Lobbying expenses, including but not limited to amounts that are a portion of membership dues. Explain the basis for recovery.

Prepared by or under the supervision of: Michael J. Maggioli

Response:

III.I.8.a Miscellaneous general expenses

Account 930 - Miscellaneous general expenses (National Fuel Gas Distribution Corporation (Pennsylvania Division) for the tweleve months ending September 30:

	2023	2024	2025
Bank and Miscellaneous Fees	$ 135,899	$ 139,960	$ 111,725
Community and Outreach	22,681	22,784	31,948
Corporate Responsibility	-	3,134	19,104
Cyber Security	-	1,006,278	1,243,933
Dues and Memberships	230,815	221,094	215,629
Human Resources and Employee Development	1,436	1,322	156
Office Expenses	8,840	4,331	4,152
Other	1,854	8,697	7,037
Professional Services	19,342	20,374	13,287
Program and Project	108,197	47,876	22,865
Safety and Compliance	73,248	46,203	72,041
	$ 602,314	$ 1,522,055	$ 1,741,876

Response:

III.I.8.b Outside service expense

Account 923 - Outside Service Expenses (National Fuel Gas Distribution Corporation (Pennsylvania Division) for the twelve months ending September 30:

	2023	2024	2025
Legal Expenses	$ 50,257	$ 23,017	$ 42,353
Office Expenses	9,368	11,252	5,724
Other	433	442	4,674
Professional Services	448,478	381,841	429,922
Software and Maintenance	122,705	113,915	171,002
Shared Services*	44,414	32,777	27,825
	$ 675,653	$ 563,243	$ 681,500

* This amount represents costs aggregated at the National Fuel Gas Distribution Corporation level and allocated to the PA Division based on established allocation methodologies. Detailed vendor-level information is not available because these expenses are recorded in consolidated accounts.

Response:

III.I.8.c Regulatory commission expenses

Account 928 - Regulatory Commission Expenses (National Fuel Gas Distribution Corporation (Pennsylvania Division) for the tweleve months ending September 30:

	2023	**2024**	**2025**
Bank and Miscellaneous Fees	$ 1,856	$ 311	$ 970
Human Resources and Employee Development	402,709	531,249	600,600
Other	76	13,170	6,552
Professional Services	521,563	44,825	41,137
Regulatory Fees	733,164	880,446	954,163
	$ 1,659,368	$ 1,470,001	$ 1,603,421

Response:

III.I.8.d Advertising expenses

Account 913 - Advertising Expenses (National Fuel Gas Distribution Corporation (Pennsylvania Division) for the twelve months ending September 30:

	2023	2024	2025
Cooperative Advertising Reimbursement Program	$ 41,636	$ 56,093	$ -
Professional Services	-	3,462	3,537
Other	-	4,000	-
	$ 41,636	$ 63,555	$ 3,537

III.I.8.e

Account 930.2 - Research and Development Expenses were not incurred for the HTY or the 2 years immediately preceding the HTY. There is no anticipated costs to be incurred for the FTY and the FPFTY.

III.I.8.f

Account 426.1 - Charitable and Civic Contributions are considered non-operating expenses and are not claimed expenses for the HTY or the 2 years immediately preceding the HTY. There is no anticipated costs to be claimed for the FTY and the FPFTY.

III.I.8.g

Account 426.4 - Lobbying Expenses are considered non-operating expenses and are not claimed expenses for the HTY or the 2 years immediately preceding the HTY. There is no anticipated costs to be claimed for the FTY and the FPFTY.

Note: For all FTY anf FPFTY information see National Fuel Exhibit ATF-1, Schedule 1.

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III-I.9

Request:

For the HTY, the FTY and the FPFTY, provide a schedule showing insurance expense (other than employee benefits) for each type of insurance coverage. Include all of the following:

III.I.9.a A statement as to whether the public utility is self-insured or third-party insured.
III.I.9.b Amounts of any reserves for claims.
III.I.9.c Explanation of how insurance expense claims in the FPFTY are calculated.

Response:

A schedule providing details on insurance expense by each type of coverage is provided on page two of this document.

III.I.9.a The Company maintains a self-insured retention for general liability, auto, and property coverages, and has a self-insured retention for workers' compensation and cyber coverages. The Company procures excess third-party coverage as detailed on the next page.

III.I.9.b The Company currently has $268,937 booked as reserves for ongoing workers' compensation claims. The Company has no other reserves booked.

III.I.9.c Insurance expense for the FPFTY has been calculated using a compound annual growth rate based on actuals from FY2023 to FY2025.

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III-I.9 (Continued)

Policy	Allocated Premium for HTY (FY 25)	Estimated Premium for FTY (FY 26)	Estimated Premium for FPFTY (TME 10/31/27)	Coverages
Directors & Officers Liability	113,240	124,372	136,598	Provides protection for Directors and Officers if sued as individuals for breach of corporate duties. Includes entity coverage to protect the company.
Excess Liability	516,013	566,737	622,447	Provides excess liability coverage above the corporate self-insured retention.
Fiduciary Insurance	46,697	51,288	56,329	Provides coverage for claims alleging improper advice/errors/omissions in administration of employee benefit plans.
Energy Package	24,646	27,068	29,729	Provides coverage for Stored Gas.
Workers' Compensation (excess)	58,540	64,294	70,615	Provides excess workers compensation coverage, over and above corporate self-insured retention.
Professional Liability	2,697	2,963	3,254	Provides professional liability coverage for lawyers directly employed by National Fuel Gas.
Crime	3,953	4,342	4,769	Provides coverage for employee dishonesty, messenger and independent contractor dishonesty, robbery, burglary an embezzlement. Social fraud coverage included.
Executive Risk	165	182	200	Provides coverage for various insurance protection to executives.
Property	93,648	102,853	112,964	Provides coverage for risk of loss of real property excess the corporate self-insured retention.
Auto Insurance	7,930	8,710	9,566	Provides auto coverage for limited number of company vehicles where drivers have additional driving privileges.
Excess Liability	6,733	7,394	8,121	Provides coverage for punitive damage claims.
Cyber Insurance	119,119	130,828	143,689	Provides data, privacy and security breach as well as business interruption coverage excess the corporate self-insured retention.
Bonds	13,881	15,246	16,744	Bond expenses
Broker Service Agreement	19,212	21,101	23,175	Broker services to assist with corporate insurance program
Other	(5,395)	(5,925)	(6,508)	Includes insurance policy credits and miscellaneous expenses
Total Expense	1,021,080	1,121,451	1,231,690	

Prepared by or under the supervision of: A. Formato

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III-I.10

Request:

For the HTY, the FTY and the FPFTY, show the amounts paid or claimed for INDUSTRY ORGANIZATIONS INCLUDED IN THE COST OF SERVICE ALONG WITH A DESCRIPTION OF EACH PAYEE ORGANIZATION.

Response:

The table below shows the amounts and descriptions of industry organizations of which the Company is a member. The Company assumes that the FTY and FPFTY expenses remain consistent with the HTY.

	HTY	FTY	FPFTY	Description
Chambers of Commerce	$ 3,430	$ 3,430	$ 3,430	Chambers of Commerce for local municipalities within the service territory of the Company
Economic Development	16,579	16,579	16,579	Builders associations and other corporations focused on providing economic growth and betterment to local communities
Associations	214,258	214,258	214,258	Industry and professional associations related to the energy sector, professional associations and community involvement
	$ 234,266	$ 234,266	$ 234,266	

Prepared by or under the supervision of: Anthony Formato

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III-I.11

Request:

Submit costs claimed for recovery in the FTY associated with cancelled construction projects or obsolete inventory. Separately identify all of the following:

III.I.11.a Projects (including employee costs broken down by payroll and benefits) or inventory.
III.I.11.b All other expense categories.
III.I.11.c Related amounts and explain the reason for the cancellation or obsolescence.

Response:

There are no costs in the FTY forecast for canceled construction projects or obsolete inventory. During the HTY, there were no cancelled construction projects and the only obsolete inventory was a $8.09 clamp.

Prepared by or under the supervision of: Anthony Formato

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III-J.1

Request:

Provide all of the following information for employee counts for the HTY, the 2 years immediately preceding the HTY, the FTY and the FPFTY:

III.J.1.a Actual and projected month-end employee counts by union, nonunion and temporary employee categories.
III.J.1.b Explanation of any material changes in employee counts.

Response (III.J.1.a):
Please see Attachments 1-5 (III.J.1.a)_Employee Counts for the union and nonunion employee counts for the HTY the 2 years preceding the HTY, the FTY and the FPFTY. National Fuel Gas Distribution Corporation does not have a temporary workforce.

Response (III.J.1.b):

There were no material changes in employee counts.

Prepared by or under the supervision of: Valerie L. Hawthorn Wagner

	10/2022	11/2022	12/2022	1/2023	2/2023	3/2023	4/2023	5/2023	6/2023	7/2023	8/2023	9/2023
Union	203	205	205	207	204	202	202	200	198	199	202	205
Non-Union	215	219	214	213	211	223	222	221	220	223	219	220
Temporary	0	0	0	0	0	0	0	0	0	0	0	0
Total	418	424	419	420	415	425	424	421	418	422	421	425

Attachment 2 (III.J.1.a)
(10/1/23-9/30/24)

	10/2023	11/2023	12/2023	1/2024	2/2024	3/2024	4/2024	5/2024	6/2024	7/2024	8/2024	9/2024
Union	206	207	206	207	210	209	204	205	204	204	205	203
Non-Union	229	229	225	232	234	236	238	236	237	234	233	233
Temporary	0	0	0	0	0	0	0	0	0	0	0	0
Total	435	436	431	439	444	445	442	441	441	438	438	436

	10/2024	11/2024	12/2024	1/2025	2/2025	3/2025	4/2025	5/2025	6/2025	7/2025	8/2025	9/2025
Union	204	210	210	209	206	207	206	208	211	211	210	210
Non-Union	231	231	232	239	237	235	235	235	237	234	228	226
Temporary	0	0	0	0	0	0	0	0	0	0	0	0
Total	435	441	442	448	443	442	441	443	448	445	438	436

Attachment 4 (III.J.1.a)
FTY (10/1/25-9/30/26)

	10/2025	11/2025	12/2025	1/2026	2/2026	3/2026	4/2026	5/2026	6/2026	7/2026	8/2026	9/2026
Union	204	210	210	212	212	212	212	212	212	212	212	212
Non-Union	231	230	230	231	231	231	231	231	232	232	232	232
Temporary	0	0	0	0	0	0	0	0	0	0	0	0
Total	435	440	440	443	443	443	443	443	444	444	444	444

Attachment 5 (III.J.1.a)
FPFTY (10/1/26-9/30/27)

	10/2026	11/2026	12/2026	1/2027	2/2027	3/227	4/2027	5/2027	6/2027	7/2027	8/2027	9/2027
Union	215	215	215	215	215	215	215	215	215	215	215	215
Non-Union	235	235	235	235	235	235	235	235	235	235	235	235
Temporary	0	0	0	0	0	0	0	0	0	0	0	0
Total	450	450	450	450	450	450	450	450	450	450	450	450

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III-J.2

Request:

Provide all of the following payroll expense information, by union, nonunion and temporary employee categories:

III.J.2.a	Total annual payroll and overtime for the HTY, the 2 years immediately preceding the HTY, the FTY and the FPFTY.
III.J.2.b	Percentage and annual amount of payroll expense increases for the HTY, the FTY and the FPFTY. For increases not attributable to routine cost of living wage rate increases or union contracts, provide the percentage and annual amount of payroll expense increases for the 2 years immediately preceding the HTY.
III.J.2.c	Percentage and annual amount of payroll expense increases attributable to incentive plans or bonuses for the HTY, the 2 years immediately preceding the HTY, the FTY and the FPFTY.
III.J.2.d	Dates and percentages of pay increases for the 2 years immediately preceding the HTY in the same format for test year data provided in response to previously listed J.2.c.
III.J.2.e	Document(s) or statement(s) verifying that the actual payroll plus the increases equal the payroll expense claimed in the supporting data (by categories of expenses) for the HTY.
III.J.2.f	Document(s) or statement(s) showing that the verification shown in J.2.e will be conducted for the FTY and the FPFTY. Indicating the procedures for addressing any material differences between estimated expenses and actual expenses for the FTY and the FPFTY.
III.J.2.g	Copy of incentive compensation and bonus compensation plan documents.

Response:

III.J.2.a Please see summary on page 2 of this document for detail on the HTY and the preceding 2 years. Please refer to National Fuel Exhibit ATF-4 for detailed support on the FYT and FPFTY.

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III-J.2 (continued)

Total Payroll Attributable to PA Employees			
All Expense Types			
Classification	**FY23**	**FY24**	**FY25 (HTY)**
Non-Supervisory Wages			
2154 PA Suppl 93-2003	$ 77,702	$ 78,248	$ 79,120
Excluded	654,498	578,216	484,925
IBFO Local 22 Supplemental	5,961,186	6,129,358	6,396,312
Local 2154 PA New Supplemental	6,874,728	7,100,233	7,364,036
Local 2154 PA Production	263,228	250,948	236,144
Local 22 Firemen/Oilers	182,209	110,668	80,392
PA Non-Union Hourly	4,457,195	5,070,819	5,213,866
Total Salaries			
Supervisory (including Variable Pay)	11,108,576	13,290,895	14,647,524
Executive Compensation			
Executive Salaries	597,250	647,250	479,208
Executive Bonus	318,000	313,000	355,000
Other Annualized Payroll			
Temporary Payroll (Summer Help/Interns)	33,266	23,850	46,534
Payroll not subject to wage increases	420,402	335,420	270,228
Overtime - Total for All Nonsalaried Employees	1,453,526	1,242,618	1,319,913
Total PAD Payroll	$ 32,401,767	$ 35,171,523	$ 36,973,199

III.J.2.b Please refer to RR-28 for the HTY and preceding 2 years raise information. The assumed raises for the FTY and FPFTY can be found in National Fuel Exhibit ATF-4.

III-J.2 (continued)

III.J.2.c Please see below table for detail on the HTY and the 2 years preceding the HTY. Please refer to National Fuel Exhibit ATF-4 for detailed support on the FTY and FPFTY. The below amounts represent the actual cash payments made in the fiscal year related to the prior fiscal year's results.

PAD Net O&M Labor			
Incentive/Bonus Cash Payments			
	FY23	**FY24**	**FY25**
Executive Bonus	$ 879,832	$ 769,322	$ 779,752
O&M Variable Pay	$ 602,865	$ 1,283,696	$ 1,315,708

III.J.2.d Please refer to RR-28 for the HTY and preceding 2 year raise information. The assumed raises for the FTY and FPFTY can be found in National Fuel Exhibit ATF-4.

III.J.2.e Please refer to National Fuel Exhibit ATF-4 for detailed support.

III.J.2.f Please refer to National Fuel Exhibit ATF-4 for detailed support.

III.J.2.g Please refer to RR-27 for a copy of the Company's annual at risk compensation plan documents. Additionally, please refer to National Fuel Exhibit VLH-1 for a copy of the annual cash bonus program (Variable Pay) documents.

Prepared by or under the supervision of: Anthony Formato

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III-J.3

Request:

Provide all of the following employee benefit information by union, nonunion and temporary employee categories:

III.J.3.a Actual and projected expenses, by benefit type, for the HTY, the 2 years immediately preceding the HTY, the FTY and the FPFTY, separately identifying specific benefits and costs for executives and officers.

III.J.3.b Total annual insurance premiums for each type of employee insurance coverage for the HTY, the FTY and the FPFTY, indicating whether the public utility is self-insured or third-party-insured.

III.J.3.c Explanation of any projected increases in employee insurance expenses for the FTY and the FPFTY.

III.J.3.d Actual and projected total annual contributions by employees for insurance coverage for the HTY, the FTY and the FPFTY.

Response:

III.J.3.a Please see National Fuel Exhibit MPW-1 and note that, where possible, benefit costs have been broken down by employee type.

III.J.3.b Please see National Fuel Exhibit MPW-1 and note that hospitalization (including prescription drug coverage) is self-insured, and group life insurance is third-party-insured.

III.J.3.c For medical and prescription insurance, a trend rate is established based on rolling twelve month claims data in which the rolling twelve month average claims per enrolled participant at the end of the HTY is compared to the rolling twelve month average claims per enrolled participant at the beginning of the HTY. This trend rate is then applied to the estimated claims per enrolled participant from HTY to FTY and FPFTY. These trend rates are shown on National Fuel Exhibit No. MPW-1 Pages 5 and 6. In addition, expected changes in participant counts are also taken into consideration. For life insurance (including AD&D), since the Company has entered into a multi-year rate agreement with the carrier, the only expected increases are due to increases in expected participants.

III.J.3.d Please see National Fuel Exhibit MPW-1.

Prepared by or under the supervision of: Michael P. Weidner

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III-J.4

Request:

Provide capitalized percentages and amounts of payroll and employee benefit expense for the HTY, the 2 years immediately preceding the HTY, the FTY and the FPFTY.

Response:

	TME 9/30/2023	TME 9/30/2024	HTY	FTY	FPFTY
Operating & Maintenance (O&M) Labor	76.48%	74.10%	74.49%	75.02%	75.02%
Construction & Retirements (CAR) Labor	11.00%	12.42%	11.71%	11.71%	11.71%
Other Income & Deductions (OID) Labor	0.08%	0.09%	0.12%	0.10%	0.10%
Undistributed (UND) Labor	1.69%	1.55%	2.47%	1.90%	1.90%
Intercompany Expense (ITC) Labor	10.75%	11.84%	11.21%	11.27%	11.27%
Total	**100.00%**	**100.00%**	**100.00%**	**100.00%**	**100.00%**
Operating & Maintenance (O&M) Labor	$ 31,338,281	$ 32,263,511	$ 34,569,322	$ 32,723,705	$ 32,723,705
Construction & Retirements (CAR) Labor	$ 4,509,309	$ 5,407,026	$ 5,435,179	$ 5,117,171	$ 5,117,171
Other Income & Deductions (OID) Labor	$ 32,699	$ 40,017	$ 53,712	$ 42,142	$ 42,142
Undistributed (UND) Labor	$ 691,184	$ 674,350	$ 1,148,400	$ 837,978	$ 837,978
Intercompany Expense (ITC) Labor	$ 4,405,838	$ 5,157,060	$ 5,201,942	$ 4,921,613	$ 4,921,613
Total	$ 40,977,311	$ 43,541,963	$ 46,408,555	$ 43,642,610	$ 43,642,610

Note: the percentages and amounts above are based on net labor, and include the impact of loaned/borrowed labor between the Company and its affiliates. In addition, the FTY $s and FPFTY %s are based on 3-Year averages. Please note that O&M% of the Company's labor of 73.14%, which is used in the Benefits and Labor exhibits, are specific to the Company's employees and do not include the impact of loaned or borrowed labor

Prepared by or under the supervision of:

Michael P. Weidner

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-J-Payroll, Benefits, and Retiree Costs
Delivered on January 28, 2026

III-J.5

Request:

If deferred compensation is a part of the payroll and employee benefit expense claim, provide the actual and projected annual total of any deferred income paid to employees in the HTY, the 2 years immediately preceding the HTY, the FTY and the FPFTY.

Response:

Deferred compensation is not part of the payroll and employee benefits claims.

Prepared by or under the supervision of: Michael P Weidner

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III-J.6

Request:

Provide all of the following pension information for the HTY, the FTY and the FPFTY:

III.J.6.a Total annual pension expense claimed.
III.J.6.b Method used to develop the pension plan claim.
III.J.6.c Breakdown between capitalized and expensed pension amounts.
III.J.6.d Actual cash pension contribution amounts for the HTY and 2 years immediately preceding the HTY, and projected cash pension contributions for the FTY and the FPFTY.
III.J.6.e Most recent actuarial studies for the pension plan.
III.J.6.f Actuarial support, if any, for actual and projected pension cash contribution amounts for the FTY, the FPFTY and any additional future periods.
III.J.6.g Credit balance in the test year used to make the base rate claim. If not reflected in the claim, state why not.
III.J.6.h Copy of the pension funding policy.
III.J.6.i Copy of retirement plan documents.
III.J.6.j If the pension cost figures include any unfunded pension costs, state the unfunded portion.

Response:

III.J.6.a There is no requested pension expense rate recovery.
III.J.6.b Pension rate recovery is derived from forecasted contributions, and there are no forecasted contributions.
III.J.6.c There are no contributions in the HTY or forecasted contributions in the FTY or FPFTY, and there no requested rate recovery. As such, there is no breakdown between capitalized and expensed amounts.
III.J.6.d There were contributions of $971,989 and $2,325,957 during the 12 months ended 9/30/2024 and 9/30/2023, respectively. There are no contributions in the HTY or forecasted contributions for the FTY or FPFTY.
III.J.6.e Information related to actuarial studies is CONFIDENTIAL. The Company is providing CONFIDENTIAL Attachment III.6.e in a separately sealed envelope that is marked “CONFIDENTIAL”. The Company hereby requests that the content of such envelope be placed in the Commission’s NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such CONFIDENTIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order

issued in this proceeding

III.J.6.f There are no contributions for the FTY. At the time of the filing, there is no requested rate recovery, as there were no projected contributions for the FTY, FPFTY or additional future periods. As such, this is not applicable.

III.J.6.g Based on the responses above, there is no credit balance that is part of a base rate claim.

III.J.6.h National Fuel Gas Company's ("NFG's") policy is to fund the Retirement Plan ("Plan") with an amount necessary to satisfy the minimum funding requirements of applicable laws and regulations and not more than the maximum amount deductible for federal income tax purposes. The calculation of NFG's annual cash contribution to the Plan requires the extensive use of assumptions including, but not limited to, projections of future discount rates, returns on plan assets, compensation levels, mortality, and employee turnover. To assist it in developing reasonable estimates of prospective pension contributions, NFG utilizes the services of Mercer Human Resource Consulting ("Mercer"), its outside actuarial consultant. Working with NFG's personnel, Mercer prepares a report annually that analyzes past financial results, evaluates current and future economic conditions and quantifies a range of amounts that NFG may contribute for pensions in a given year. The low end of the range represents the minimum contribution necessary to comply with the provisions of the Employee Retirement Income Security Act of 1974 ("ERISA"). The top end of the range represents the maximum pension contribution that is deductible on a current basis under the Internal Revenue Code.

Using this information NFG determines the amount it will fund for a given year. In making that determination, NFG considers, among other things, the funded status of the plan, the current and expected return on the plan's investments, the level of cash expected to flow out of the plan in the form of retiree benefits, and estimates of future minimum funding requirements. The amount of the contribution is then allocated to each portion of the NFG's system, including the Company, on the basis of normal pension cost (that is, based upon each subsidiary's share of the pension plan's service and interest cost).

III.J.6.i Information related to retirement plan documents is CONFIDENTIAL. The Company is providing CONFIDENTIAL Attachment III.6.i in a separately sealed envelope that is marked "CONFIDENTIAL". The Company hereby requests that the content of such envelope be placed in the Commission's NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such CONFIDENTIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding

III.J.6.j Not applicable.

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-J-Payroll, Benefits, and Retiree Costs
Delivered on January 28, 2026

III-J.7

Request:

Provide for other post-employment benefits expense (OPEB) all of the following:

III.J.7.a Actual and projected OPEB expenses for the HTY, the FTY and the FPFTY.
III.J.7.b Explanation of the basis for the claim, for example, accrual, pay-as-you-go, some other method, or combination of bases.
III.J.7.c Most recent actuarial studies for OPEBs.
III.J.7.d Documentation necessary to support the claimed amounts.

Response:

III.J.7.a There were no expenses for the HTY and there are no forecasted expenses for the FTY or FPFTY. As such, there is no requested rate recovery.
III.J.7.b There is no requested rate recovery, so this is not applicable
III.J.7.c Please see attached.
III.J.7.d There is no requested rate recovery, so this is not applicable.

Prepared by or under the supervision of: Michael P Weidner

Mercer

welcome to brighter

ASC 715 (US GAAP) Actuarial Valuation Report as of September 30, 2025

National Fuel Gas Company Postretirement Benefits

National Fuel Gas Company
November 4, 2025

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Appendix A: NPPBC for fiscal year ending September 30, 2025 by division and employment status

Appendix B: Reconciliation of funded status as of September 30, 2025 by division and employment status

Section 1

Highlights

This report presents the results under US accounting standards for the National Fuel Gas Company postretirement medical and life insurance plans for management's use in the preparation of the Company's financial statements for the accounting period October 1, 2024 through September 30, 2025.

Section 2 presents the basic valuation results and disclosures, including the components of the net periodic postretirement benefit cost (NPPBC) and a reconciliation of the financial information. **Section 3** presents information regarding plan assets. **Section 4** describes the actuarial basis on which the results of an application of the standards are founded.

The other comprehensive income/(loss) items for the fiscal year ending September 30, 2025 due to plan changes and net gain/(loss) arising during the year were $0 and $(19,722,202), respectively. The sources of the net loss are described in Section 2.4.

For the fiscal year ending September 30, 2025, reclassification adjustments of other comprehensive income/(loss) recognized as components of NPPBC consist of $(428,689) of prior service cost/(credit) and $37,012 of net loss/(gain).

The total other comprehensive income/(loss) for the fiscal year ending September 30, 2025 is $(20,113,879).

This valuation reflects the impact of the Medicare Prescription Drug, Improvement, and Modernization Act of 2003.

Summary of principal plan results

	Fiscal year ending	
	September 30, 2025	September 30, 2024
Service cost with interest to end of year	$ 518,981	$ 434,446
Net periodic postretirement benefit cost/(income)	(11,515,835)	(13,341,794)
Estimated pay-as-you-go cost	24,040,094	23,547,335

	Fiscal year ending	
	September 30, 2025	September 30, 2024
Accumulated postretirement benefit obligation (APBO)		
Inactives	$ 283,976,937	$ 272,096,832
Actives fully eligible	34,719,004	34,995,147
Actives not yet fully eligible	11,887,766	13,932,887
Total	$ 330,583,707	$ 321,024,866
Fair value of assets	496,105,580	496,064,799
Unfunded APBO	$ (165,521,873)	$ (175,039,933)

	Fiscal year ending	
	September 30, 2025	September 30, 2024
Number of participants in the medical valuation		
Inactives	1,904	1,960
Actives	180	212
Total	2,084	2,172

Important notices

Mercer has prepared this report exclusively for National Fuel Gas Company. Subject to this limitation, National Fuel Gas Company may direct that this report be provided to its auditors in connection with an audit of its financial statements. Mercer is not responsible for use of this report by any other party.

The only purpose of this report is to present Mercer's actuarial estimates of liabilities as of September 30, 2025 for the National Fuel Gas Company postretirement medical and life insurance benefits for National Fuel Gas Company to incorporate, as it deems appropriate, in its financial statements under US accounting standards.

This report may not be used for any other purpose. Mercer is not responsible for the consequences of any unauthorized use. Its contents may not be modified, incorporated into or used in other material, sold or otherwise provided, in whole or in part, to any other person or entity without Mercer's permission.

This report was prepared in accordance with generally accepted actuarial principles and procedures. The results reported herein are based on the assumptions and methods described in Section 4 of this report. The actuarial assumptions were selected by National Fuel Gas Company. Based on the information provided to us, we believe that the actuarial assumptions are reasonable for the purposes described in this report.

All parts of this report, including any documents incorporated by reference, are integral to understanding and explaining its contents. No part may be taken out of context, used, or relied upon without reference to the report as a whole.

Decisions about benefit changes, granting new benefits, investment policy, funding policy, benefit security, and/or benefit-related issues should not be made solely on the basis of this valuation, but only after careful consideration of alternative economic, financial, demographic, and societal factors, including financial scenarios that assume future sustained investment losses.

National Fuel Gas Company is ultimately responsible for selecting the plan's accounting policies, methods, and assumptions. The policies, methods, and assumptions used for the valuation are described in Section 4 of this report. National Fuel Gas Company is solely responsible for communicating to Mercer any changes required to the policies, methods, or assumptions.

National Fuel Gas Company is solely responsible for selecting the plan's investment policies, asset allocations, and individual investments. The Mercer consultants who prepared this report have not provided any investment advice to National Fuel Gas Company.

This report is based on our understanding of applicable law and regulations as of the valuation date. Mercer is not an accountant or auditor and is not responsible for the interpretation of, or compliance with, accounting standards. Citations to and descriptions of accounting standards provided in this report are for reference purposes only. Mercer is not a law firm and this analysis is not intended to be a legal opinion. National Fuel Gas Company should consider securing the advice of legal counsel with respect to any legal matters related to this document and any attachments.

To prepare this report, we have used Mercer's suite of proprietary valuation software and tools. The purpose of a valuation is to measure the plan's liabilities, reflecting the applicable census data and provisions and using the methods and assumptions selected by National Fuel Gas Company based on

the applicable laws, regulations, and other guidance in effect as of the measurement date. We have relied on the experts who developed each of the following:

- Mercer's portfolio return calculator
- Mercer's capital market assumptions
- Mercer's yield curve models
- Mercer's retiree medical trend model
- Mercer's retiree aging model

The first three tools were used in setting the discount rate and in evaluating the reasonableness of the economic assumptions, such as the expected rate of return on plan assets. The final two tools were used in developing the trend table and in developing the aging table.

Actuarial Standard of Practice No. 56 requires the actuary to identify and disclose any material inconsistencies among actuarial assumptions, and, for assumptions that are not prescribed by applicable law, the reason for such inconsistencies. To our knowledge, there are no material inconsistencies in assumptions.

National Fuel Gas Company should notify Mercer promptly after receipt of this report if it disagrees with anything contained herein or is aware of any information that would affect the results of the valuation that has not been communicated to Mercer or incorporated herein. This report will be deemed final and acceptable to National Fuel Gas Company unless such notice is promptly provided to Mercer.

Professional qualifications

We are available to answer any questions on the material contained in this report or to provide explanations or further detail as may be appropriate. Collectively, the undersigned credentialed actuaries meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained in this report. We are not aware of any direct or material indirect financial interest or relationship, including investment consulting or other services provided to National Fuel Gas Company by the actuaries signing this report that could create a conflict or impair the objectivity of this work. To the extent that other Mercer professionals have provided investment services to National Fuel Gas Company, we do not believe those services would result in a conflict of interest nor affect the objectivity of this work.

November 4, 2025

Emily Taddeo, Principal, FSA, EA

Date

Mercer (US) LLC
70 Linden Oaks, Suite 310
Rochester, New York 14625
585 389 8700

November 4, 2025

Roshni Shah, Principal, ASA, MAAA

Date

Mercer (US) LLC
1717 Main Street
Dallas, Texas 75201
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Section 2

Accounting information

US accounting standards require that certain information about postretirement benefits other than pension benefits be disclosed in the footnotes to the sponsor's financial statements. The disclosures include a statement of the net periodic postretirement benefit cost, a reconciliation of the plan's funded status, a statement of assumptions and methods, and benefit payments expected to be paid in the next ten years. Presented in this section are illustrations of this information.

Section 2.1 Disclosure of net periodic postretirement benefit cost for fiscal year ending September 30, 2025

Section 2.2 Reconciliation of funded status

Section 2.3 Disclosure of sensitivity to changes in health care cost trend rates for fiscal year ending September 30, 2025

Section 2.4 Supporting documentation

A. Reconciliation of cumulative employer contributions in excess of net periodic postretirement benefit cost during fiscal year ending September 30, 2025
B. Determination of net (gain)/loss for fiscal year ending September 30, 2025
C. Effect of assumption changes for fiscal year ending September 30, 2025
D. Amortization of (gains)/losses applicable to entities other than NY Distribution Corporation for the period October 1, 2024 to September 30, 2025
E. Amortization of vintage (gains)/losses applicable to NY Distribution Corporation for the period October 1, 2024 to September 30, 2025
F. Amortization of prior service (credit)/cost for fiscal year ending September 30, 2025
G. Other changes recognized in other comprehensive income

Section 2.5 Employer disclosure information

Section 2.1: Net periodic postretirement benefit cost for fiscal year ending September 30, 2025

		Fiscal year ending September 30, 2025
1.	**Service cost**	$ 518,981
2.	**Interest cost**	$ 14,501,221
3.	**Actual return on assets**	
	a. Expected return	$ 26,144,360
	b. Asset (gain)/loss	2,650,462
	c. Actual return (a. – b.)	$ 23,493,898
4.	**Other NPPBC components**	
	a. Amortization of prior service (credit)/cost	$ (428,689)
	b. Amortization of (gain)/loss	37,012
	c. Deferral of asset (gain)/loss	2,650,462
	d. Total (a. + b. - c.)	$ (3,042,139)
5.	**Net periodic postretirement benefit cost** (1. + 2. – 3.c. + 4.d.)	**$ (11,515,835)**

Section 2.2: Reconciliation of funded status

		Fiscal year ending	
		September 30, 2025	September 30, 2024
1.	Accumulated postretirement benefit obligation	$ 330,583,707	$ 321,024,866
2.	Fair value of assets	496,105,580	496,064,799
3.	Funded status (2. – 1.)	$ 165,521,873	$ 175,039,933
4.	Net amount recognized	$ 165,521,873	$ 175,039,933
Amounts not yet reflected in net periodic postretirement benefit cost and included in accumulated other comprehensive income			
5.	Prior service credit/(cost)	$ 257,210	$ 685,899
6.	Accumulated gain/(loss)	(19,813,186)	(127,996)
7.	Accumulated other comprehensive income/(loss) (5. + 6.)	$ (19,555,976)	$ 557,903
8.	Cumulative employer contributions in excess of net periodic postretirement benefit cost	$ 185,077,849	$ 174,482,030
9.	**Net amount recognized in statement of financial position** (7. + 8.)	**$ 165,521,873**	**$ 175,039,933**

Section 2.3: Supporting documentation

Sensitivity to changes in health care cost trend rates for fiscal year ending September 30, 2025

	Valuation trend	Valuation trend +1%	Difference	% change
The aggregate of the service cost and interest cost	$ 15,020,202	$ 16,800,767	$ 1,780,565	11.85%
Accumulated postretirement benefit obligation as of September 30, 2025	$ 330,583,707	$ 362,507,371	$ 31,923,664	9.66%

	Valuation trend	Valuation trend -1%	Difference	% change
The aggregate of the service cost and interest cost	$ 15,020,202	$ 13,582,616	$ (1,437,586)	(9.57)%
Accumulated postretirement benefit obligation as of September 30, 2025	$ 330,583,707	$ 302,979,911	$ (27,603,796)	(8.35)%

Trend rate assumptions

Health care cost trend rates on eligible charges as of September 30, 2025	Medical		Prescription drug	Medicare Part B premium	Retiree drug subsidy
	Pre 65	Post 65			
Initial trend (2025)	7.25%	5.75%	11.75%	5.75%	4.00%
Ultimate trend	4.00%	4.00%	4.00%	4.00%	4.00%
Number of years to ultimate trend	25	25	25	25	25

Section 2.4: Supporting documentation

A. Reconciliation of cumulative employer contributions in excess of net periodic postretirement benefit cost

			Fiscal year ending September 30, 2025
1.	Cumulative employer contributions in excess of net periodic postretirement benefit cost at September 30, 2024	$	174,482,030
2.	Employer contributions during fiscal 2025		593,848
3.	Net periodic postretirement benefit (cost)/income for fiscal 2025		11,515,835
4.	Subsidy payment received		(1,513,864)
5.	**Cumulative employer contributions in excess of net periodic postretirement benefit cost at September 30, 2025** (1. + 2. + 3. + 4.)	**$**	**185,077,849**

The net contributions shown in item 2 above include funding contributions and benefit payments made by National Fuel Gas Company on a pay-as-you-go basis as follows:		
Contributions to trust	$	0
Benefits paid by employer on a pay-as-you-go basis		593,848
Total	$	593,848

B. Determination of net (gain)/loss for fiscal year ending September 30, 2025

Components of net (gain)/loss for fiscal year ending September 30, 2025		
1. Change in demographics/claims experience		
a. Projected APBO as of September 30, 2025	$	312,004,974
b. APBO as of September 30, 2025 before change in assumptions		322,507,932
c. (Gain)/loss from change in demographics/claims[1] (b. – a.)	$	10,502,958
2. Change in assumptions		
a. APBO as of September 30, 2025 before change in assumptions	$	322,507,932
b. APBO as of September 30, 2025 after change in assumptions		330,583,707
c. (Gain)/loss due to assumption changes (b. – a.)	$	8,075,775
3. Net benefit payments		
a. Expected net benefit payments for fiscal year ending September 30, 2025	$	24,040,094
b. Actual net benefit payments for fiscal year ending September 30, 2025		22,533,101
c. (Gain)/loss from benefit payments (b. – a.)	$	(1,506,993)
4. Investment results		
a. Expected return on assets for fiscal year ending September 30, 2025	$	26,144,360
b. Actual return on assets for fiscal year ending September 30, 2025		23,493,898
c. (Gain)/loss from investment results (a. – b.)	$	2,650,462

Summary of net (gain)/loss arising during 2025		
1. Change in demographics/claims experience	$	10,502,958
2. Change in assumptions		8,075,775
3. Net benefit payments		(1,506,993)
4. Investment results		2,650,462
Net (gain)/loss arising during 2025 (1. + 2. + 3. + 4.)	**$**	**19,722,202**

(Gain)/loss balance as of September 30, 2025		
1. (Gain)/loss balance as of September 30, 2024	$	127,996
2. Amount amortized during 2025		37,012
3. Net (gain)/loss arising during 2025		19,722,202
(Gain)/loss balance as of September 30, 2025 (1. – 2. + 3.)	**$**	**19,813,186**

[1] Reflects a loss of $4,077,506 due to demographic experience and a loss of $6,425,452 due to claims experience.

C. Effect of assumption changes for fiscal year ending September 30, 2025

The effective discount rate for determining the benefit obligation increased from 4.98% per annum as of September 30, 2024 to 5.30% per annum as of September 30, 2025. This assumption change decreased the APBO by $9,913,263 as of the end of the period. Effective September 30, 2025, the mortality improvement projection scale assumption was updated to reflect the publication of additional mortality data. This assumption change decreased the APBO by $243,484 as of the end of the period. Effective September 30, 2025, the trend assumption was updated to better reflect anticipated experience. This assumption change increased the APBO by $18,232,522 as of the end of the period.

D. Amortization of (gains)/losses applicable to entities other than NY Distribution Corporation for the period October 1, 2024 to September 30, 2025

			Total	PA Distribution	Supply	SRC	Parent	Empire Pipeline	Midstream
1.	**Accumulated postretirement benefit obligation (APBO)**	$	142,264,070	57,874,500	80,878,458	1,712,928	1,614,830	0	183,354
2.	**Fair value of plan assets**	$	215,539,005	106,314,575	109,224,430	0	0	0	0
3.	**Prior service (credit)/cost**	$	(282,708)	(116,204)	(162,298)	(3,702)	(504)	0	0
4.	**Cumulative employer contributions in excess of net periodic postretirement benefit cost**	$	93,313,270	61,532,824	36,237,633	(1,969,886)	(2,041,074)	(7,712)	(438,515)
5.	**Unrecognized (gain)/loss** (1. – 2. – 3. + 4.)	$	20,321,043	13,208,953	8,053,959	(253,256)	(425,740)	(7,712)	(255,161)
6.	**Market-related value of plan assets (MRV)**	$	215,539,005	106,314,575	109,224,430	0	0	0	0
7.	**Excess of fair value over market-related value** (2. – 6.)		0	0	0	0	0	0	0
8.	**Unrecognized (gain)/loss potentially subject to amortization** (5. + 7.)			13,208,953	8,053,959	(253,256)	(425,740)	(7,712)	(255,161)
9.	**Corridor (calculated separately for union and nonunion based on 10% of the larger of APBO or MRV)**			10,631,458	10,922,443	171,293	161,483	0	18,335
10.	**Unrecognized (gain)/loss subject to amortization**[2]			3,435,261	1,317,990	(81,963)	(264,257)	(7,712)	(236,826)
11.	**Average future service of active participants**			4.06	4.06	4.06	4.06	4.06	4.06
12.	**Weighted amortization amount** (10. ÷ 11.)	**$**	**1,025,244**	**846,123**	**324,628**	**(20,188)**	**(65,088)**	**(1,900)**	**(58,331)**

[2] Generally, this is the excess of the absolute value of 8. over 9. However, the unrecognized (gain)/loss subject to amortization is determined separately for collectively and non-collectively bargained employees, which can produce a different result. See Appendix A for additional details.

E. Amortization of vintage (gains)/losses applicable to NY Distribution Corporation for the period October 1, 2024 to September 30, 2025

	Summary for fiscal year 2025		
	Balance at beginning of period	Amount recognized	Balance at end of period
Prior vintage year	$ 1,830,358	1,830,358	$ 0
Vintage year 1	7,738,368	3,869,186	3,869,182
Vintage year 2	(12,999,293)	(4,333,099)	(8,666,194)
Vintage year 3	(3,194,472)	(798,618)	(2,395,854)
Vintage year 4	10,870,194	2,174,039	8,696,155
Vintage year 5	(865,995)	(144,333)	(721,662)
Vintage year 6	(28,132,320)	(4,018,903)	(24,113,417)
Vintage year 7	1,565,223	195,653	1,369,570
Vintage year 8	(5,580,399)	(620,044)	(4,960,355)
Vintage year 9	8,575,289	857,529	7,717,760
Vintage year 10	N/A	N/A	9,614,932
Total	**$ (20,193,047)**	**(988,232)**	**$ (9,589,883)**

The base associated with vintage year 10 was established as of September 30, 2025, the base associated with vintage year 9 was established as of September 30, 2024, etc.

F. Amortization of prior service (credit)/cost for fiscal year ending September 30, 2025

Description	Amortization period			Balances		Payment
	Date created	Initial years	Years left	Initial	Outstanding	
Prior service (credit)/cost						
Plan amendment – 2011	10/1/2011	14.60	0.60	$ (6,258,856)	$ (257,210)	$ (257,210)
Total				**$ (6,258,856)**	**$ (257,210)**	**$ (257,210)**

Prior service (credit)/cost amount		
1.	Amount of base	$ (6,258,856)
2.	Amortization period	14.60 years
3.	Effective date	10/01/2011

Amortization schedule

Year	Beginning balance	Amortization amount	Ending balance
2011	$ 0	$ 0	$ (6,258,856)
2012	(6,258,856)	(428,689)	(5,830,167)
2013	(5,830,167)	(428,689)	(5,401,478)
2014	(5,401,478)	(428,689)	(4,972,789)
2015	(4,972,789)	(428,689)	(4,544,100)
2016	(4,544,100)	(428,689)	(4,115,411)
2017	(4,115,411)	(428,689)	(3,686,722)
2018	(3,686,722)	(428,689)	(3,258,033)
2019	(3,258,033)	(428,689)	(2,829,344)
2020	(2,829,344)	(428,689)	(2,400,655)
2021	(2,400,655)	(428,689)	(1,971,966)
2022	(1,971,966)	(428,689)	(1,543,277)
2023	(1,543,277)	(428,689)	(1,114,588)
2024	(1,114,588)	(428,689)	(685,899)
2025	(685,899)	(428,689)	(257,210)
2026	(257,210)	(257,210)	0

G. Other changes recognized in other comprehensive income

	Fiscal year ending September 30, 2025	Fiscal year ending September 30, 2024
Prior service cost/(credit) arising during period	$ 0	$ 0
Net loss/(gain) arising during period	19,722,202	16,301,573
Amortizations		
Prior service (cost)/credit	428,689	428,689
(Loss)/gain	(37,012)	2,266,499
Total recognized in other comprehensive (income)/loss	**$ 20,113,879**	**$ 18,996,761**
Total recognized in NPPBC and other comprehensive (income)/loss	**$ 8,598,044**	**$ 5,654,967**

Section 2.5: Employer disclosure information

	Fiscal year ending September 30, 2025	Fiscal year ending September 30, 2024
Change in benefit obligation		
Benefit obligation at beginning of period	$ 321,024,866	$ 274,278,704
Service cost	518,981	434,446
Interest cost	14,501,221	15,560,929
Plan participants' contributions	3,597,332	3,401,115
Retiree drug subsidy receipts[3]	1,513,864	1,207,655
Actuarial (gain)/loss	17,071,740	54,441,980
Amendments	0	0
Special termination benefits	0	0
Benefits paid	(27,644,297)	(28,299,963)
Benefit obligation at end of period	**$ 330,583,707**	**$ 321,024,866**
Change in plan assets		
Fair value of plan assets at beginning of period	$ 496,064,799	$ 455,702,334
Actual return on plan assets	23,493,898	64,782,388
Employer contributions	593,848	478,925
Plan participants' contributions	3,597,332	3,401,115
Benefits paid	(27,644,297)	(28,299,963)
Fair value of assets at end of period	**$ 496,105,580**	**$ 496,064,799**
Funded status	**$ 165,521,873**	**$ 175,039,933**
Amounts recognized[4] in the statement of financial position consist of		
Noncurrent assets	$ 169,227,570	$ 178,551,045
Current liabilities	(224,452)	(220,156)
Noncurrent liabilities	(3,481,245)	(3,290,956)
Net amount recognized at year-end	**$ 165,521,873**	**$ 175,039,933**

[3] National Fuel Gas Company recognizes Retiree Drug Subsidy (RDS) receipts as they are received.

[4] Amounts are determined on a company by company basis and then aggregated.

	Fiscal year ending September 30, 2025	Fiscal year ending September 30, 2024
Amounts not yet reflected in net periodic benefit cost and included in accumulated other comprehensive income/(loss)		
Transition asset/(obligation)	$ 0	$ 0
Prior service credit/(cost)	257,210	685,899
Accumulated gain/(loss)	(19,813,186)	(127,996)
Accumulated other comprehensive income/(loss)	**$ (19,555,976)**	**$ 557,903**
Cumulative employer contributions in excess of NPPBC	185,077,849	174,482,030
Net amount recognized in statement of financial position	**$ 165,521,873**	**$ 175,039,933**

Weighted-average assumptions used to determine benefit obligations as of September 30		
Effective discount rate	5.30%	4.98%
Average rate of compensation increase	N/A	N/A
	See Exhibit A	See Exhibit B
Components of net periodic benefit cost		
Service cost	$ 518,981	$ 434,446
Interest cost	14,501,221	15,560,929
Expected return on plan assets	(26,144,360)	(26,641,981)
Amortization of transition (asset)/obligation	0	0
Amortization of prior service (credit)/cost	(428,689)	(428,689)
Amortization of actuarial (gain)/loss	37,012	(2,266,499)
Net periodic benefit cost	**$ (11,515,835)**	**$ (13,341,794)**

Weighted-average assumptions used to determine net periodic postretirement benefit cost		
Effective discount rate for benefit obligation	4.98%	5.99%
Effective rate for interest on benefit obligation	4.69%	5.93%
Effective discount rate for service cost	5.21%	5.99%
Effective rate for interest on service cost	5.14%	6.01%
Expected long-term rate of return on plan assets	5.40%	6.00%
Average rate of compensation increase	N/A	N/A
Health care trend rates	See Exhibit B	See Exhibit C

	Fiscal year ending September 30, 2025	Fiscal year ending September 30, 2024
Expected cash flows		
Expected employer contributions for fiscal year ending September 30, 2026	$ 224,452	
Expected future benefit payments, net of retiree contributions and Medicare subsidy receipts, for fiscal year ending:		
September 30, 2026	$ 25,339,394	
September 30, 2027	25,981,651	
September 30, 2028	26,482,955	
September 30, 2029	26,767,306	
September 30, 2030	26,837,918	
Next five years	127,760,656	
Expected Medicare subsidy receipts for fiscal year ending:		
September 30, 2026	$ (1,559,756)	
September 30, 2027	(1,574,137)	
September 30, 2028	(1,576,905)	
September 30, 2029	(1,576,656)	
September 30, 2030	(1,568,152)	
Next five years	(7,535,970)	
Effect of one percentage point change in the assumed health care cost trend rates		
One percentage point increase		
Effect on total of service and interest cost components	$ 1,780,565	$ 1,676,000
Effect on postretirement benefit obligation	31,923,664	32,128,111
One percentage point decrease		
Effect on total of service and interest cost components	$ (1,437,586)	$ (1,408,162)
Effect on postretirement benefit obligation	(27,603,796)	(27,699,518)

	Fiscal year ending September 30, 2025	Fiscal year ending September 30, 2024
Cumulative employer contributions in excess of net periodic benefit cost		
Amount as of beginning of year	$ 174,482,030	$ 161,868,966
Net periodic benefit (cost)/income for year	11,515,835	13,341,794
Employer contributions made in fiscal year	593,848	478,925
Subsidy payments received	(1,513,864)	(1,207,655)
Amount as of end of year	**$ 185,077,849**	**$ 174,482,030**
Reconciliation of prior service cost/(credit)		
Amount at beginning of year	$ (685,899)	$ (1,114,588)
Amortization	428,689	428,689
Amount arising during year due to plan change	0	0
Amount at end of year	**$ (257,210)**	**$ (685,899)**
Reconciliation of net loss/(gain)		
Amount at beginning of year	$ 127,996	$ (18,440,076)
Amortization	(37,012)	2,266,499
Obligation loss/(gain) during year	17,071,740	54,441,980
Asset loss/(gain) during year	2,650,462	(38,140,407)
Amount at end of year	**$ 19,813,186**	**$ 127,996**

Exhibit A – Trend rates for determining the benefit obligation at September 30, 2025

	Medical				
Year	Pre-65	Post-65	Drug	Medicare Part B	Retiree drug subsidy
2025	7.25%	5.75%	11.75%	5.75%	4.00%
2026	6.91	5.62	10.76	5.62	4.00
2027	6.56	5.49	9.78	5.49	4.00
2028	6.22	5.36	8.79	5.36	4.00
2029	5.88	5.23	7.81	5.23	4.00
2030	5.53	5.11	6.82	5.11	4.00
2031	5.19	4.98	5.83	4.98	4.00
2032	4.85	4.85	4.85	4.85	4.00
2033	4.80	4.80	4.80	4.80	4.00
2034	4.75	4.75	4.75	4.75	4.00
2035	4.71	4.71	4.71	4.71	4.00
2036	4.66	4.66	4.66	4.66	4.00
2037	4.61	4.61	4.61	4.61	4.00
2038	4.57	4.57	4.57	4.57	4.00
2039	4.52	4.52	4.52	4.52	4.00
2040	4.47	4.47	4.47	4.47	4.00
2041	4.42	4.42	4.42	4.42	4.00
2042	4.38	4.38	4.38	4.38	4.00
2043	4.33	4.33	4.33	4.33	4.00
2044	4.28	4.28	4.28	4.28	4.00
2045	4.24	4.24	4.24	4.24	4.00
2046	4.19	4.19	4.19	4.19	4.00
2047	4.14	4.14	4.14	4.14	4.00
2048	4.09	4.09	4.09	4.09	4.00
2049	4.05	4.05	4.05	4.05	4.00
2050+	4.00	4.00	4.00	4.00	4.00

Exhibit B – Trend rates for determining the benefit obligation at September 30, 2024 and the net periodic postretirement benefit cost for 2025

Year	Medical		Drug	Medicare Part B	Retiree Drug Subsidy
	Pre-65	Post-65			
2024	6.25%	5.75%	10.25%	5.75%	4.00%
2025	6.04	5.62	9.47	5.62	4.00
2026	5.84	5.48	8.70	5.48	4.00
2027	5.63	5.35	7.92	5.35	4.00
2028	5.43	5.21	7.14	5.21	4.00
2029	5.22	5.08	6.36	5.08	4.00
2030	5.01	4.94	5.59	4.94	4.00
2031	4.81	4.81	4.81	4.81	4.00
2032	4.76	4.76	4.76	4.76	4.00
2033	4.72	4.72	4.72	4.72	4.00
2034	4.67	4.67	4.67	4.67	4.00
2035	4.63	4.63	4.63	4.63	4.00
2036	4.58	4.58	4.58	4.58	4.00
2037	4.54	4.54	4.54	4.54	4.00
2038	4.49	4.49	4.49	4.49	4.00
2039	4.45	4.45	4.45	4.45	4.00
2040	4.40	4.40	4.40	4.40	4.00
2041	4.36	4.36	4.36	4.36	4.00
2042	4.31	4.31	4.31	4.31	4.00
2043	4.27	4.27	4.27	4.27	4.00
2044	4.22	4.22	4.22	4.22	4.00
2045	4.18	4.18	4.18	4.18	4.00
2046	4.13	4.13	4.13	4.13	4.00
2047	4.09	4.09	4.09	4.09	4.00
2048	4.04	4.04	4.04	4.04	4.00
2049+	4.00	4.00	4.00	4.00	4.00

Exhibit C – Trend rates used for determining the net periodic postretirement benefit cost for 2024

Year	Medical		Drug	Medicare Part B	Retiree Drug Subsidy
	Pre-65	Post-65			
2023	6.25%	5.00%	6.85%	5.00%	6.60%
2024	5.97	4.97	6.45	4.97	6.25
2025	5.69	4.94	6.05	4.94	5.90
2026	5.40	4.90	5.64	4.90	5.54
2027	5.12	4.87	5.24	4.87	5.19
2028	4.84	4.84	4.84	4.84	4.84
2029	4.80	4.80	4.80	4.80	4.80
2030	4.76	4.76	4.76	4.76	4.76
2031	4.71	4.71	4.71	4.71	4.71
2032	4.67	4.67	4.67	4.67	4.67
2033	4.63	4.63	4.63	4.63	4.63
2034	4.59	4.59	4.59	4.59	4.59
2035	4.55	4.55	4.55	4.55	4.55
2036	4.50	4.50	4.50	4.50	4.50
2037	4.46	4.46	4.46	4.46	4.46
2038	4.42	4.42	4.42	4.42	4.42
2039	4.38	4.38	4.38	4.38	4.38
2040	4.34	4.34	4.34	4.34	4.34
2041	4.29	4.29	4.29	4.29	4.29
2042	4.25	4.25	4.25	4.25	4.25
2043	4.21	4.21	4.21	4.21	4.21
2044	4.17	4.17	4.17	4.17	4.17
2045	4.13	4.13	4.13	4.13	4.13
2046	4.08	4.08	4.08	4.08	4.08
2047	4.04	4.04	4.04	4.04	4.04
2048+	4.00	4.00	4.00	4.00	4.00

Section 3
Plan assets

In this section, we present information regarding plan assets as reported by National Fuel Gas Company. The plan assets represent the portion of total plan liabilities which have been funded as of the valuation date.

Section 3.1 Summary of market value of assets as of September 30, 2025

Section 3.2 Reconciliation of assets for fiscal year ending September 30, 2025

Section 3.3 Asset (gain)/loss for fiscal year ending September 30, 2025

Section 3.4 Contributions for fiscal years ending September 30, 2025 and September 30, 2026

Section 3.1: Summary of market value of assets as of September 30, 2025

Summary of VEBA market value of assets as of September 30, 2025

Asset categories	New York Distribution Nonbargaining VEBA	New York Distribution Bargaining VEBA	Pennsylvania Distribution Nonbargaining VEBA	Pennsylvania Distribution Bargaining VEBA	Supply Nonbargaining VEBA	Supply Bargaining VEBA	Total market value
1. Fund assets							
a. Cash and cash equivalents	$ 2,904,161	$ 2,835,011	$ 1,665,786	$ 1,513,165	$ 1,698,859	$ 1,685,070	$ 12,302,052
b. Fixed income	14,125,572	75,465,706	15,642,916	24,974,870	10,686,881	24,704,677	165,600,622
c. Real estate	0	0	0	0	0	0	0
d. Equities	22,383,057	114,722,718	4,948,478	37,145,388	16,912,672	36,282,998	232,395,311
e. Accrued income	9,287	8,784	5,712	5,040	5,563	5,707	40,093
f. Settlement cash	55,256	1,000	(116,625)	1,000	(107,708)	1,000	(166,077)
g. Total fund assets	$ 39,477,333	$ 193,033,219	$ 22,146,267	$ 63,639,463	$ 29,196,267	$ 62,679,452	$ 410,172,001
2. Receivables or payables							
a. Employer contributions	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
b. Accrued admin. expenses	(22,883)	(46,681)	(14,339)	(17,151)	(15,255)	(19,038)	(135,347)
c. Other reimbursement	0	0	0	0	0	0	0
d. Federal income taxes	743,036	0	381,437	0	571,509	0	1,695,982
e. Accumulated deferred income taxes	290,239	0	87,627	0	148,632	0	526,498
f. Contribution correction	0	0	0	0	0	0	0
g. Accrued benefits	(333,498)	(851,710)	(283,759)	(233,020)	(211,697)	(333,031)	(2,246,715)
3. Market value as of September 30, 2025	**$ 40,154,227**	**$ 192,134,828**	**$ 22,317,233**	**$ 63,389,292**	**$ 29,689,456**	**$ 62,327,383**	**$ 410,012,419**

Summary of 401(h) market value of assets as of September 30, 2025

Asset categories	New York Distribution Nonbargaining 401(h)	Pennsylvania Distribution Nonbargaining 401(h)	Supply Nonbargaining 401(h)	Total market value
1. Fund assets				
a. Cash and cash equivalents	$ 1,890,937	$ 826,532	$ 674,976	$ 3,392,445
b. Equities	4,416,180	1,930,320	1,576,369	7,922,869
c. Fixed income	36,376,767	15,900,354	12,984,796	65,261,917
d. Real estate	5,680,601	2,483,002	2,027,708	10,191,311
e. Venture capital	0	0	0	0
f. Accrued income	310,017	135,509	110,661	556,187
g. Other (hedge fund to fund)	0	0	0	0
h. Total fund assets	$ 48,674,502	$ 21,275,717	$ 17,374,510	$ 87,324,729
2. Receivables or payables				
a. Employer contributions	$ 0	$ 0	$ 0	$ 0
b. Accrued admin. expenses	0	0	0	0
c. Payable to brokers	(686,472)	(300,058)	(245,038)	(1,231,568)
3. Market value as of September 30, 2025	**$ 47,988,030**	**$ 20,975,659**	**$ 17,129,472**	**$ 86,093,161**

Section 3.2: Reconciliation of assets for fiscal year ending September 30, 2025

Reconciliation of VEBA assets

Asset categories	New York Distribution Nonbargaining VEBA	New York Distribution Bargaining VEBA	Pennsylvania Distribution Nonbargaining VEBA	Pennsylvania Distribution Bargaining VEBA	Supply Nonbargaining VEBA	Supply Bargaining VEBA	Total Market Value
1. Market value as of October 1, 2024	**$ 42,382,831**	**$ 191,499,183**	**$ 23,918,799**	**$ 62,007,691**	**$ 30,762,180**	**$ 61,812,613**	**$ 412,383,297**
2. Receipts							
a. Employer contributions	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
b. Participant contributions	792,005	1,263,107	317,120	407,195	348,169	469,736	3,597,332
c. Total	$ 792,005	$ 1,263,107	$ 317,120	$ 407,195	348,169	469,736	3,597,332
3. Disbursements							
a. Benefit payments	$ (4,518,952)	$ (11,482,911)	$ (2,571,988)	$ (2,580,491)	$ (2,452,225)	$ (3,443,882)	$ (27,050,449)
b. Administrative expenses	(239,650)	(507,656)	(289,255)	(169,901)	(297,067)	(190,693)	(1,694,222)
c. Change in tax position	(636,030)	0	(356,711)	0	(462,791)	0	(1,455,532)
d. Total	$ (5,394,632)	$ (11,990,567)	$ (3,217,954)	$ (2,750,392)	$ (3,212,083)	$ (3,634,575)	$ (30,200,203)
4. Investment income							
a. Interest and dividends	$ 1,388,577	$ 6,734,799	$ 770,783	$ 2,205,569	$ 1,022,472	$ 2,181,832	$ 14,304,032
b. Net realized appreciation/(depreciation)	(5,120,733)	(22,054,273)	(2,733,103)	(7,370,708)	(3,675,177)	(7,072,216)	(48,026,210)
c. Net unrealized appreciation/(depreciation)	6,106,179	26,682,579	3,261,588	8,889,937	4,443,895	8,569,993	57,954,171
d. Total	$ 2,374,023	$ 11,363,105	$ 1,299,268	$ 3,724,798	$ 1,791,190	$ 3,679,609	$ 24,231,993
5. Market value as of September 30, 2025	**$ 40,154,227**	**$ 192,134,828**	**$ 22,317,233**	**$ 63,389,292**	**$ 29,689,456**	**$ 62,327,383**	**$ 410,012,419**

Reconciliation of 401(h) assets

Asset categories	New York Distribution Nonbargaining 401(h)	Pennsylvania Distribution Nonbargaining 401(h)	Supply Nonbargaining 401(h)	Total market value
1. Market value as of October 1, 2024	**$ 46,643,780**	**$ 20,388,085**	**$ 16,649,637**	**$ 83,681,502**
2. Receipts				
a. Employer contributions	$ 0	$ 0	$ 0	$ 0
b. Participant contributions	0	0	0	0
c. Total	$ 0	$ 0	$ 0	$ 0
3. Disbursements				
a. Benefit payments	$ 0	$ 0	$ 0	$ 0
b. Administrative expenses	(149,272)	(65,247)	(53,283)	(267,802)
c. Change in tax position	0	0	0	0
d. Total	$ (149,272)	(65,247)	(53,283)	(267,802)
4. Investment income				
a. Interest and dividends	$ 1,956,091	$ 855,011	$ 698,233	$ 3,509,335
b. Net realized appreciation/(depreciation)	(1,075,607)	(470,150)	(383,941)	(1,929,698)
c. Net unrealized appreciation/(depreciation)	613,038	267,960	218,826	1,099,824
d. Total	$ 1,493,522	$ 652,821	$ 533,118	$ 2,679,461
5. Market value as of September 30, 2025	**$ 47,988,030**	**$ 20,975,659**	**$ 17,129,472**	**$ 86,093,161**

Section 3.3: Asset (gain)/loss

Determination of asset (gain)/loss

			Fiscal year ending September 30, 2025
1.	Market value at September 30, 2025	$	496,105,580
2.	Net actual distributions[5]		22,533,101
3.	Actual employer contributions[6]		(920,016)
4.	Market value at September 30, 2024		496,064,799
5.	Actual return on assets (1. + 2. - 3. - 4.)	$	23,493,898
6.	Expected return on assets		26,144,360
7.	**Asset (gain)/loss** (6. - 5.)	**$**	**2,650,462**

[5] Net of retiree drug subsidy receipts and participant contributions.
[6] Net of retiree drug subsidy receipts.

Section 3.4: Contributions

Employer VEBA contributions for fiscal year ending September 30, 2025

Date	New York Distribution Nonbargaining VEBA	New York Distribution Bargaining VEBA	Pennsylvania Distribution Nonbargaining VEBA	Pennsylvania Distribution Bargaining VEBA	Supply Nonbargaining VEBA	Supply Bargaining VEBA	Total contributions
N/A	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0

Expected employer VEBA contributions for the fiscal year ending September 30, 2026

Date	New York Distribution Nonbargaining VEBA	New York Distribution Bargaining VEBA	Pennsylvania Distribution Nonbargaining VEBA	Pennsylvania Distribution Bargaining VEBA	Supply Nonbargaining VEBA	Supply Bargaining VEBA	Total contributions
N/A	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0

Employer 401(h) contributions for fiscal year ending September 30, 2025

Date	New York Distribution Nonbargaining 401(H)	Pennsylvania Distribution Nonbargaining 401(H)	Supply Nonbargaining 401(H)	Total contributions
N/A	$ 0	$ 0	$ 0	$ 0

Expected employer 401(h) contributions for fiscal year ending September 30, 2026

Date	New York Distribution Nonbargaining 401(H)	Pennsylvania Distribution Nonbargaining 401(H)	Supply Nonbargaining 401(H)	Total contributions
N/A	$ 0	$ 0	$ 0	$ 0

Section 4

Basis of valuation

In this section, the basis of the valuation is presented. The provisions of the plan and the participant census are the foundation of the valuation, since these are the present facts upon which the projection of benefit payments depends. The valuation is based on the premise that the plan will continue in existence, so that future events must also be considered. These future events are assumed to occur in accordance with the actuarial assumptions and methods described in this section.

Section 4.1 Plan participants

Section 4.2 Actuarial basis

Section 4.3 Summary of plan provisions

Section 4.4 Claim cost development and medical rate information

Section 4.1: Plan participants

Mercer has used and relied on participant data supplied by National Fuel Gas Company. National Fuel Gas Company is responsible for ensuring that the participant data provides an accurate description of all persons who are participants under the terms of the plan or otherwise entitled to benefits as of January 1, 2025 and that the data is sufficiently comprehensive and accurate for its intended purpose. If the data supplied is not sufficiently comprehensive and accurate for its intended purpose, the results of our calculations may differ significantly from the results that would be obtained with such data. Although Mercer has reviewed the suitability of the data for its intended use in accordance with Actuarial Standard of Practice No. 23, Mercer has not verified or audited any of the data or information provided.

A. Prescription drug participation statistics by subsidiary

	Actives			Retirees			Surviving spouses			
	Bargaining	Non-bargaining	Total	Bargaining	Non-bargaining	Total	Bargaining	Non-bargaining	Total	Grand total
NY Distribution	26	54	80	726	326	1,052	38	25	63	1,195
PA Distribution	5	18	23	175	145	320	0	10	10	353
Supply	14	33	47	229	192	421	2	11	13	481
SRC	0	1	1	0	6	6	0	2	2	9
Parent	0	0	0	0	9	9	0	1	1	10
Empire Pipeline	0	0	0	0	0	0	0	0	0	0
Midstream	0	1	1	0	0	0	0	0	0	1
Total	45	107	152	1,130	678	1,808	40	49	89	2,049

B. Medical plan participation statistics by subsidiary

	Actives			Retirees			Surviving spouses			Grand total
	Bargaining	Non-bargaining	Total	Bargaining	Non-bargaining	Total	Bargaining	Non-bargaining	Total	
NY Distribution	45	54	99	734	326	1,060	38	25	63	1,222
PA Distribution	5	18	23	175	145	320	0	10	10	353
Supply	23	33	56	229	191	420	2	11	13	489
SRC	0	1	1	0	6	6	0	2	2	9
Parent	0	0	0	0	9	9	0	1	1	10
Empire Pipeline	0	0	0	0	0	0	0	0	0	0
Midstream	0	1	1	0	0	0	0	0	0	1
Total	73	107	180	1,138	677	1,815	40	49	89	2,084

C. Life insurance participation statistics by subsidiary

	Actives			Retirees				
	Bargaining	Non-bargaining	Total	Bargaining	Non-bargaining	Total	Surviving spouses	Grand Total
NY Distribution	45	49	94	781	334	1,115	0	1,209
PA Distribution	5	17	22	177	145	322	0	344
Supply	23	29	52	235	188	423	0	475
SRC	0	6	6	0	40	40	0	46
Parent	0	0	0	0	8	8	0	8
Empire Pipeline	0	0	0	0	0	0	0	0
Midstream	0	1	1	0	0	0	0	1
Total	73	102	175	1,193	715	1,908	0	2,083

D. Medicare Part B reimbursement participation statistics by subsidiary

	Actives			Retirees				
	Bargaining	Non-bargaining	Total	Bargaining	Non-bargaining	Total	Surviving spouses	Grand Total
NY Distribution	35	0	35	523	73	596	0	631
PA Distribution	5	0	5	177	32	209	0	214
Supply	20	0	20	227	52	279	0	299
SRC	0	0	0	0	1	1	0	1
Parent	0	0	0	0	1	1	0	1
Empire Pipeline	0	0	0	0	0	0	0	0
Midstream	0	0	0	0	0	0	0	0
Total	60	0	60	927	159	1,086	0	1,146

E. Participant data reconciliation – Prescription drug

	Actives	Inactive participants		Total
		Retirees	Surviving spouses	
As of January 1, 2024	184	1,860	93	2,137
Retirements	(30)	30	0	0
Active deaths with surviving spouses	0	0	0	0
Active deaths without surviving spouses	0	0	0	0
Inactive deaths with surviving spouse	0	(5)	5	0
Inactive deaths without surviving spouse	0	(72)	(9)	(81)
Terminations with no benefit due	0	0	0	0
Discontinued coverage	(2)	(8)	0	(10)
Renewed coverage	0	3	0	3
Data adjustments	0	0	0	0
Net change	(32)	(52)	(4)	(88)
As of December 31, 2024	152	1,808	89	2,049

F. Participant data reconciliation – Medical

	Actives	Inactive participants		Total
		Retirees	Surviving spouses	
As of January 1, 2024	212	1,867	93	2,172
Retirements	(31)	31	0	0
Active deaths with surviving spouses	0	0	0	0
Active deaths without surviving spouses	0	0	0	0
Inactive deaths with surviving spouse	0	(5)	5	0
Inactive deaths without surviving spouse	0	(72)	(9)	(81)
Terminations with no benefit due	0	0	0	0
Discontinued coverage	(1)	(9)	0	(10)
Renewed coverage	0	3	0	3
Data adjustments	0	0	0	0
Net change	(32)	(52)	(4)	(88)
As of December 31, 2024	180	1,815	89	2,084

G. Participant data reconciliation – Life insurance

	Actives	Inactive participants		Total
		Retirees	Surviving spouses	
As of January 1, 2024	209	1,952	0	2,161
Retirements	(34)	34	0	0
Active deaths	0	0	0	0
Inactive deaths	0	(78)	0	(78)
Terminations with no benefit due	0	0	0	0
Data adjustments	0	0	0	0
Net change	(34)	(44)	0	(78)
As of December 31, 2024	175	1,908	0	2,083

H. Participant data reconciliation – Medicare Part B reimbursement

	Actives	Inactive participants		Total
		Retirees	Surviving spouses	
As of January 1, 2024	68	1,140	0	1,208
Retirements	(8)	8	0	0
Active deaths	0	0	0	0
Inactive deaths	0	(62)	0	(62)
Terminations with no benefit due	0	0	0	0
No longer eligible	0	0	0	0
Data adjustments	0	0	0	0
Net change	(8)	(54)	0	(62)
As of December 31, 2024	60	1,086	0	1,146

I. Distribution of active participants as of December 31, 2024 – Prescription drug

Age	Years of service									Total
	< 5	5 - 9	10 - 14	15 - 19	20 - 24	25 - 29	30 - 34	35 - 39	40 +	
< 25										
25 - 29										
30 - 34										
35 - 39										
40 - 44					2	1				3
45 - 49					9	5				14
50 - 54					7	8	7	1		23
55 - 59					12	12	23	11		58
60 - 64					6	2	6	17	8	39
65 - 69					1		1	2	7	11
70 - 74									2	2
75 +									2	2
Total					37	28	37	31	19	152

J. Distribution of active participants as of December 31, 2024 – Medical

Age	Years of service									Total
	< 5	5 - 9	10 - 14	15 - 19	20 - 24	25 - 29	30 - 34	35 - 39	40 +	
< 25										
25 - 29										
30 - 34										
35 - 39										
40 - 44					2	1				3
45 - 49					12	7				19
50 - 54					15	14	7	1		37
55 - 59					14	14	23	11		62
60 - 64					10	2	6	17	8	43
65 - 69					1		1	2	7	11
70 - 74						1			2	3
75 +									2	2
Total					54	39	37	31	19	180

K. Distribution of active participants as of December 31, 2024 – Life insurance

Age	Years of service									Total
	< 5	5 - 9	10 - 14	15 - 19	20 - 24	25 - 29	30 - 34	35 - 39	40 +	
< 25										
25 - 29										
30 - 34										
35 - 39										
40 - 44					2	1				3
45 - 49					12	7				19
50 - 54					17	15	6	1		39
55 - 59					13	13	21	11		58
60 - 64					10	2	6	17	8	43
65 - 69					1			2	5	8
70 - 74						1			2	3
75 +									2	2
Total					55	39	33	31	17	175

L. Distribution of active participants as of December 31, 2024 – Medicare Part B reimbursement

Age	Years of service									Total
	< 5	5 - 9	10 - 14	15 - 19	20 - 24	25 - 29	30 - 34	35 - 39	40 +	
< 25										
25 - 29										
30 - 34										
35 - 39										
40 - 44					1	1				2
45 - 49					4	4				8
50 - 54					12	8	1			21
55 - 59					7	6	3	1		17
60 - 64					9			2		11
65 - 69						1				1
70 - 74										
75 +										
Total					33	20	4	3		60

M. Distribution of inactive participants as of December 31, 2024 – Prescription drug

Age	Retirees	Surviving spouses	Total
< 50	0	0	0
50-54	0	0	0
55-59	20	0	20
60-64	146	0	146
65-69	260	6	266
70-74	359	8	367
75-79	445	30	475
80-84	299	15	314
85-89	184	16	200
90-94	73	10	83
95 +	22	4	26
Total	1,808	89	1,897

N. Distribution of inactive participants as of December 31, 2024 – Medical

Age	Retirees	Surviving spouses	Total
< 50	0	0	0
50-54	1	0	1
55-59	21	0	21
60-64	148	0	148
65-69	264	6	270
70-74	360	8	368
75-79	444	30	474
80-84	299	15	314
85-89	183	16	199
90-94	73	10	83
95 +	22	4	26
Total	1,815	89	1,904

O. Distribution of inactive participants as of December 31, 2024 – Life insurance

Age	Retirees	Surviving spouses	Total
< 50	0	0	0
50-54	1	0	1
55-59	25	0	25
60-64	159	0	159
65-69	309	0	309
70-74	380	0	380
75-79	453	0	453
80-84	302	0	302
85-89	185	0	185
90-94	72	0	72
95 +	22	0	22
Total	1,908	0	1,908

P. Distribution of inactive participants as of December 31, 2024 – Medicare Part B reimbursement

Age	Retirees	Surviving spouses	Total
< 50	0	0	0
50-54	1	0	1
55-59	9	0	9
60-64	57	0	57
65-69	101	0	101
70-74	170	0	170
75-79	228	0	228
80-84	248	0	248
85-89	176	0	176
90-94	74	0	74
95 +	22	0	22
Total	1,086	0	1,086

Section 4.2: Actuarial basis

An actuarial valuation is only a snapshot of a plan's estimated financial condition at a particular point in time; it does not predict a plan's future financial condition or its ability to pay benefits in the future and does not provide any guarantee of future financial soundness of a plan. Over time, a plan's total cost will depend on a number of factors, including the amount of benefits the plan pays, the number of people paid benefits, the period of time over which benefits are paid, plan expenses, and the amount earned on any assets invested to pay benefits. These amounts and other variables are uncertain and unknowable at the valuation date.

Because modeling all aspects of a situation is not possible or practical, we may use summary information, estimates, or simplifications of calculations to facilitate the modeling of future events in an efficient and cost-effective manner. We may also exclude factors or data that, if used, would not, in our judgment, significantly affect our results. Use of such simplifying techniques does not, in our judgment, affect the reasonableness of valuation results for a plan.

Valuations do not affect the ultimate cost of a plan, only the timing of when benefit costs are recognized. Cost recognition occurs over time. If the costs recognized over a period of years are lower or higher than necessary, for whatever reason, normal and expected practice is to adjust future cost levels to recognize the entire cost of a plan over time.

A. Accounting methods

Actuarial cost method

Benefit obligations are estimated using the Projected Unit Credit method. The objective under this method is to expense each participant's benefits under the plan as they would accrue, taking into consideration the plan's benefit allocation formula. Thus, the estimated total benefit to which each participant is expected to become entitled at retirement is broken down into units, each associated with a year of past or future service.

An individual's estimated accrued benefit for valuation purposes is the projected benefit at full eligibility date, or current age if later, multiplied by the ratio of service at the valuation date over service at full eligibility date. Service for this purpose is measured from date of hire. The portion of the present value which is attributed to the current year is the service cost. The portion of the present value attributed to prior periods is the accumulated postretirement benefit obligation (APBO) or accrued liability. The APBO can also be viewed as the accumulated value of past service costs. This amount includes the entire present value for actives who are eligible to retire and those who are already retired.

The plan's service cost is estimated by combining the individual service costs, and the plan's APBO is estimated by combining the individual benefit obligations.

Asset method

The market-related value of assets is equal to the market value.

Changes since prior valuation

None.

B. Accounting policies

Measurement date

September 30.

Amortization of prior service costs/credits
Prior service costs/credits that arise due to a plan change during a fiscal year are amortized on a straight-line basis over the average remaining service period to full eligibility of participants who are expected to receive a benefit and are active at the date of the plan amendment.

Amortization of gains/losses
New York Distribution: Gains/losses are amortized on a vintage-year basis over 10 years. This is the method prescribed by the New York Public Service Commission in their policy statement for rate reimbursement in New York and is acceptable under US GAAP since it results in more rapid amortization of gains/losses than the minimum imposed under the standards.

All entities other than New York Distribution: Gains/losses in excess of 10% of the greater of the APBO or market-related value of plan assets (determined solely with respect to those entities) are amortized on a straight-line basis over the average future working lifetime of the employees of those entities expected to receive benefits under the plan.

Changes since prior valuation
None.

C. Valuation procedures

Financial and claims data
We have used financial data, claims, and premiums supplied by the plan sponsor, without further audit. Customarily, this information would not be verified by a plan's actuary. We have reviewed the information for internal consistency and we have no reason to doubt its substantial accuracy.

Determination of benefit obligations
The benefit obligations are determined by discounting each year's cash flows using the corresponding rate from the Above Mean Mercer Yield Curve as of the measurement date.

Calculation of interest
Interest on the benefit obligations for purposes of determining the interest cost and service cost components of the net periodic postretirement benefit cost is calculated by applying interest to the present value of the expected payment at each payment date. For this purpose, interest is determined using the same spot rate used to determine the present value of the associated payment.

Effective discount rate
The effective discount rate is the single equivalent rate such that the present value of the plan's APBO cash flows using the single rate equals the present value of those cash flows using the corresponding spot rates along the Above Mean Mercer Yield Curve. The same process is applied to the plan's service cost cash flows to determine the effective discount rate associated with the service cost.

Effective rate for interest
The effective rate for interest on the benefit obligation is the single equivalent rate such that interest on the plan's APBO using the single rate equals the sum of the interest on each year's discounted cash flow determined using the corresponding spot rates along the Above Mean Mercer Yield Curve. The same process is applied to the plan's discounted service cost cash flows to determine the effective rate for interest on the service cost.

Projection of obligations

APBO and service cost cash flows are determined as of the census date reflecting disclosed assumption changes and then adjusted to the measurement date to reflect additional service accruals during the interim period and to exclude payments expected to be made prior to the measurement date. Differences between actual and expected benefit payments for the period between the census date and the measurement date are recognized proportionally in all future cash flows.

Changes since prior valuation

None.

D. Actuarial assumptions

To prepare an actuarial valuation, assumptions are used in a forward-looking financial and demographic model to present a single scenario from a wide range of possibilities. The future is uncertain and the plan's actual experience will differ from those assumptions. These differences may be significant or material because actuarial estimates can be very sensitive to the assumptions made and, in some cases, to the interaction between the assumptions.

Different assumptions or scenarios within the range of possibilities may also be reasonable and results based on alternative assumptions would be different. As a result of the uncertainty inherent in a forward-looking projection over a very long period of time, no one projection is uniquely "correct" and many alternative projections of the future could also be regarded as reasonable. Two different actuaries could, quite reasonably, arrive at different results based on the same data and different views of the future. A "sensitivity analysis" shows the degree to which results would be different if alternative assumptions are used for the actuarial estimates. At National Fuel Gas Company's request, Mercer is available to perform such an analysis.

Assumptions may change from one valuation to the next because of changes in requirements, plan experience, changes in expectations about the future, and other factors. A change in assumptions is not an indication that prior assumptions were unreasonable when made.

Economic assumptions

Effective discount rate for benefit obligation

- 5.99% per annum for determining the 2024 net periodic postretirement benefit cost.
- 4.98% per annum for determining the September 30, 2024 benefit obligation and the 2025 net periodic postretirement benefit cost.
- 5.30% per annum for determining the September 30, 2025 benefit obligation.

Effective rate for interest on the benefit obligation

- 5.93% per annum for determining the 2024 net periodic postretirement benefit cost.
- 4.69% per annum for determining the 2025 net periodic postretirement benefit cost.

Effective discount rate for service cost

- 5.99% per annum for determining the 2024 net periodic postretirement benefit cost.
- 5.21% per annum for determining the 2025 net periodic postretirement benefit cost.

Effective rate for interest on the service cost

- 6.01% per annum for determining the 2024 net periodic postretirement benefit cost.
- 5.14% per annum for determining the 2025 net periodic postretirement benefit cost.

Rationale: The effective rates are determined using Mercer's proprietary Above Mean Yield Curve, under which the plan's projected benefit payments are matched against a series of spot rates derived from a market basket of high-quality fixed income securities.

Expected long-term rate of return on assets

- 6.00% per annum for determining the 2024 net periodic postretirement benefit cost.
- 5.40% per annum for determining the 2025 net periodic postretirement benefit cost.

Rationale: To develop the expected rate of return on assets, the Company considered the current level of expected returns on risk-free investments (primarily government bonds), the historical level of the risk premium associated with the other asset classes in which the portfolio is invested, and the expectations for future returns of each asset class. The expected rate of return for each asset class was then weighted based on the asset allocation to develop the expected rate of return on assets for the plan.

Salary increases

Age	Rate
25	9.50%
30	8.50
35	6.50
40	6.00
45	5.50
50	5.00
55	4.50
60	4.00

Rationale: These rates have been used historically and have not produced significant gains or losses.

Demographic assumptions

Mortality

- Pri-2012 mortality tables (with no collar adjustment), with separate rates for males/females, healthy/disabled participants, and annuitants/non-annuitants, projected with generational improvement using scale MSS-2023 for determining the 2024 net periodic postretirement benefit cost.
- Pri-2012 mortality tables (with no collar adjustment), with separate rates for males/females, healthy/disabled participants, and annuitants/non-annuitants, projected with generational improvement using Scale MSS-2024 for determining the September 30, 2024 benefit obligation and the 2025 net periodic postretirement benefit cost.
- Pri-2012 mortality tables (with no collar adjustment), with separate rates for males/females, healthy/disabled participants, and annuitants/non-annuitants, projected with generational improvement using Scale MSS-2025 for determining the September 30, 2025 benefit obligation.

Rationale: Mortality is based on the Society of Actuaries' Pri-2012 tables. The rates based on the full data set are used because the plan's participants are a mix of blue-collar and white-collar individuals. Future mortality improvement is based on the 2025 Trustees Report of the Social Security Administration, as reflected in the Mercer-developed MSS-2025 improvement scale. The improvement rates implied by the report's mortality projections are based on an analysis of the specific factors that impact mortality improvement as well as potential long-term trends for those factors.

Termination rates

0.50% of the active population is assumed to terminate employment annually.

Retirement rates

Age	Rate
55 - 56	7%
57 - 59	10
60 - 61	25
62	75
63 - 64	50
65	100

Rationale: These rates have been used historically and have not produced significant gains or losses.

Disability incidence

1985 pension disability class 1 incidence rates.

Spouse assumptions

80% of active male participants and 60% of active female participants are assumed to be married, and a female is assumed to be three years younger than her spouse. Actual spousal data was used for participants in pay status if available.

Participation	**Medical and Drug coverage:** 100% of eligible retirees are assumed to elect coverage. 100% of retirees electing coverage who have spouses are assumed to elect spousal coverage. It is assumed that upon retiring, participants remain in the same medical plan category (PPO, traditional, or Independent Health). For participants who do not have coverage as active employees, it is assumed that they elect coverage under the traditional plan upon retirement. Upon reaching age 65, it is assumed that participants in the PPO plan elect a traditional plan, and that all others remain in the same plan category (traditional or Independent Health). Further, it is assumed that actives in medical grid numbers 7, 8, 11, and 12 will remain in those groups at retirement and, therefore, receive prescription drug coverage through the Medical Plan. For all other eligible actives, it is assumed that they will have prescription drug coverage under a 3-tier plan upon retirement. **Life Insurance coverage:** It is assumed that upon retiring, all employees who are eligible for Basic Life Insurance will be covered. Only those employees who elect Supplemental Life Insurance as active employees are assumed to elect Supplemental Life Insurance upon retirement. Note that National Fuel Gas Company does not subsidize any portion of the Supplemental Life Insurance with the exception of a small group of retirees hired prior to 1978.

Rationale: Assumed participation is based on recent plan experience and the options available to retirees.

Claims assumptions

Medical and prescription drug starting claim costs

The starting claim costs for National Fuel Gas Company's Independent Health Plan are based on the premium rates shown in Section 4.4 since that plan is community rated. Since all other plans are self-insured, the average per person gross costs of medical and prescription drug benefits, excluding expenses, were derived from claims data provided by National Fuel Gas Company. These starting claim costs are shown below. A description of the methodology used to develop these claim costs is contained in Section 4.4.

Annual age 65 per capita claim costs

	2024 Disclosure/ 2025 NPPBC	2025 Disclosure/ 2026 NPPBC
Prescription drug plans		
$0/$1 Plan and $0/$2 Plan	$4,484	$4,974
$5/$10 Plan	$4,191	$4,648
Tier Plans[7]	$3,366	$3,733
Rx for grids 7/8/11/12	$3,834	$4,253

Medical plans	Pre 65	Post 65	Pre 65	Post 65
PPO Plan	$8,629	$2,136	$8,496	$2,394
Traditional Plans[8]	$8,865	$2,136	$8,728	$2,394
Forever Blue	N/A	$1,580	N/A	$1,687
Independent Health	$7,992	$2,338	$8,639	$2,394

Rationale: The development of the average annual age 65 per capita claim costs is described in Section 4.4.

[7] Includes prescription drug plans with tier copayments of $12.50/$24/$40 for generic/brand/specialty.

[8] For participants in the medical plan "comprehensive with Rx" (medical grids 7, 8, 11, and 12), the drug portion of the benefit was valued separately using the claim costs shown for that plan in the prescription drug section, above.

Medicare reform

The Medicare Prescription Drug, Improvement, and Modernization Act of 2003 (the "Act") is reflected assuming that National Fuel Gas Company will continue to provide a post-65 prescription drug benefit to retirees that is at least actuarially equivalent to Medicare Part D and that National Fuel Gas Company will receive the federal subsidy for all retirees and their spouses.

The Act was recognized for the 2024 disclosure and 2025 net periodic postretirement benefit cost by assuming an annual savings of $548 at age 65, and for the 2025 disclosure by assuming an annual savings of $537 at age 65.

Rationale: The RDS assumption was developed based on actual claims and enrollment from the 2021, 2022 and 2023 RDS applications, trended forward to the valuation year, and adjusted for plan design changes and participation.

Medicare Part B premium

In addition to medical costs, National Fuel Gas Company pays the Medicare Part B premium for retirees and their spouses (except for post-12/31/2000 non-union and IBEW Local 2199 and 2199-J retirements) until the death of the retiree. The assumed Medicare Part B premiums are shown below.

	2024 Disclosure/ 2025 NPPBC	2025 Disclosure/ 2026 NPPBC
Monthly	$174.70	$185.00
Annual	$2,096.40	$2,220.00

Rationale: The 2025 Medicare Part B premium rate is the rate as announced by the Centers for Medicare & Medicaid Services.

Life insurance costs

Life insurance coverage is provided to eligible retirees as summarized in Section 4.3. Note that National Fuel Gas Company does not subsidize any portion of the Supplemental Life Insurance with the exception of a small group of retirees hired prior to 1978.

Administrative expenses

Expenses are assumed to be equal to the following, where percentages represent a percentage of the respective claim costs:

	2024 Disclosure/ 2025 NPPBC	2025 Disclosure/ 2026 NPPBC
Life insurance	10%	10%
Medical[9]	$993.41 per contract	$1,104.34 per contract
Drug	0% (Included in claim costs)	0% (Included in claim costs)

Administrative expenses on a per capita basis for the Medical Plan are expected to grow at 4% per year.

Life Insurance expenses are assumed to remain at 10% of claims.

Rationale: Assumed administrative expenses for the life insurance are based on the actuary's experience with similar plans. Assumed administrative expenses for the self-insured medical plans are based on administrative fees provided by National Fuel Gas. The premiums for insured coverage are assumed to include administrative fees.

Retiree contributions

See Section 4.4.

For non-grandfathered[10] participants, the contribution amounts shown in Section 4.4 are allocated to medical versus drug coverage as follows:

	Medical	Drug
Pre-65	61.2%	38.8%
Post-65	39.6%	60.4%

Assumed retiree contributions are based on per capita claims costs and the provisions of the plan.

Future increases in retiree contribution levels

For grandfathered participants, no increases in retiree contribution amounts are assumed.

For non-grandfathered participants, retiree contribution amounts are assumed to increase at assumed health care trend rates.

Rationale: This assumption is based on our understanding that future increases to healthcare costs for non-grandfathered participants will be passed on to the participants.

[9] For the 2024 disclosure/2025 NPPBC, this represents the weighted administrative expense assumption for the 2024 calendar year, based on $990.05 per non-executive contract and $2,505.84 per executive contract. For the 2025 disclosure/2026 NPPBC, this represents the weighted administrative expense assumption for the 2025 calendar year, based on $1,100.54 per non-executive contract and $2,769.72 per executive contract.

[10] Participants who are grandfathered, and therefore unaffected by the 2008 and 2009 plan changes, include those already retired at the plan change date for their respective employee group. All others are non-grandfathered.

Death benefits

Medicare Part B reimbursement benefits cease upon death of the retiree. Spouses are assumed to continue medical and prescription drug coverage for life, 3 years, or not at all (COBRA), depending on their eligibility as defined in Section 3.3. Spouses of post-12/31/2000 non-union and IBEW Local 2199 and 2199-J retirees continue to contribute the amount the retiree was contributing before death. For all others, the spousal death benefit coverage is offset by the widow rate reimbursement identified in Section 4.3. Widow rates are increased in the future for health care trend.

Rationale: This assumption has been used historically and has not produced significant gains or losses.

Aging

The Medical Aging Factors shown below apply to all medical plans offered. The Drug Aging Factors apply to all drug plans offered.

Attained age	Medical Aging Factor	Drug Aging Factor
55	0.680	0.780
60	0.820	0.899
65	1.000	1.000
70	1.130	1.077
75	1.245	1.097
80	1.330	1.097
85	1.370	1.097
90+	1.390	1.097

Rationale: The aging assumption was based on a review of health care costs by age sponsored by the Society of Actuaries titled ***Health Care Costs – From Birth to Death*** *and published in June 2013 as well as Mercer and vendor databases of prescription drug cost results by age.*

Health care trend

- Trend rates for determining the benefit obligation at September 30, 2025:

	Medical				
Year	Pre-65	Post-65	Drug	Medicare Part B	Retiree drug subsidy
2025	7.25%	5.75%	11.75%	5.75%	4.00%
2026	6.91	5.62	10.76	5.62	4.00
2027	6.56	5.49	9.78	5.49	4.00
2028	6.22	5.36	8.79	5.36	4.00
2029	5.88	5.23	7.81	5.23	4.00
2030	5.53	5.11	6.82	5.11	4.00
2031	5.19	4.98	5.83	4.98	4.00
2032	4.85	4.85	4.85	4.85	4.00
2033	4.80	4.80	4.80	4.80	4.00
2034	4.75	4.75	4.75	4.75	4.00
2035	4.71	4.71	4.71	4.71	4.00
2036	4.66	4.66	4.66	4.66	4.00
2037	4.61	4.61	4.61	4.61	4.00
2038	4.57	4.57	4.57	4.57	4.00
2039	4.52	4.52	4.52	4.52	4.00
2040	4.47	4.47	4.47	4.47	4.00
2041	4.42	4.42	4.42	4.42	4.00
2042	4.38	4.38	4.38	4.38	4.00
2043	4.33	4.33	4.33	4.33	4.00
2044	4.28	4.28	4.28	4.28	4.00
2045	4.24	4.24	4.24	4.24	4.00
2046	4.19	4.19	4.19	4.19	4.00
2047	4.14	4.14	4.14	4.14	4.00
2048	4.09	4.09	4.09	4.09	4.00
2049	4.05	4.05	4.05	4.05	4.00
2050+	4.00	4.00	4.00	4.00	4.00

- Trend rates for determining the benefit obligation at September 30, 2024 and the net periodic postretirement benefit cost for 2025:

	Medical				
Year	Pre-65	Post-65	Drug	Medicare Part B	Retiree drug subsidy
2024	6.25%	5.75%	10.25%	5.75%	4.00%
2025	6.04	5.62	9.47	5.62	4.00
2026	5.84	5.48	8.70	5.48	4.00
2027	5.63	5.35	7.92	5.35	4.00
2028	5.43	5.21	7.14	5.21	4.00
2029	5.22	5.08	6.36	5.08	4.00
2030	5.01	4.94	5.59	4.94	4.00
2031	4.81	4.81	4.81	4.81	4.00
2032	4.76	4.76	4.76	4.76	4.00
2033	4.72	4.72	4.72	4.72	4.00
2034	4.67	4.67	4.67	4.67	4.00
2035	4.63	4.63	4.63	4.63	4.00
2036	4.58	4.58	4.58	4.58	4.00
2037	4.54	4.54	4.54	4.54	4.00
2038	4.49	4.49	4.49	4.49	4.00
2039	4.45	4.45	4.45	4.45	4.00
2040	4.40	4.40	4.40	4.40	4.00
2041	4.36	4.36	4.36	4.36	4.00
2042	4.31	4.31	4.31	4.31	4.00
2043	4.27	4.27	4.27	4.27	4.00
2044	4.22	4.22	4.22	4.22	4.00
2045	4.18	4.18	4.18	4.18	4.00
2046	4.13	4.13	4.13	4.13	4.00
2047	4.09	4.09	4.09	4.09	4.00
2048	4.04	4.04	4.04	4.04	4.00
2049+	4.00	4.00	4.00	4.00	4.00

- Trend rates for determining the net periodic postretirement benefit cost for 2024:

	Medical				
Year	Pre-65	Post-65	Drug	Medicare Part B	Retiree drug subsidy
2023	6.25%	5.00%	6.85%	5.00%	6.60%
2024	5.97	4.97	6.45	4.97	6.25
2025	5.69	4.94	6.05	4.94	5.90
2026	5.40	4.90	5.64	4.90	5.54
2027	5.12	4.87	5.24	4.87	5.19
2028	4.84	4.84	4.84	4.84	4.84
2029	4.80	4.80	4.80	4.80	4.80
2030	4.76	4.76	4.76	4.76	4.76
2031	4.71	4.71	4.71	4.71	4.71
2032	4.67	4.67	4.67	4.67	4.67
2033	4.63	4.63	4.63	4.63	4.63
2034	4.59	4.59	4.59	4.59	4.59
2035	4.55	4.55	4.55	4.55	4.55
2036	4.50	4.50	4.50	4.50	4.50
2037	4.46	4.46	4.46	4.46	4.46
2038	4.42	4.42	4.42	4.42	4.42
2039	4.38	4.38	4.38	4.38	4.38
2040	4.34	4.34	4.34	4.34	4.34
2041	4.29	4.29	4.29	4.29	4.29
2042	4.25	4.25	4.25	4.25	4.25
2043	4.21	4.21	4.21	4.21	4.21
2044	4.17	4.17	4.17	4.17	4.17
2045	4.13	4.13	4.13	4.13	4.13
2046	4.08	4.08	4.08	4.08	4.08
2047	4.04	4.04	4.04	4.04	4.04
2048+	4.00	4.00	4.00	4.00	4.00

Rationale: Initial rates are based on market assessments and surveys and take into account actual historical experience, expected unit cost information, changes in utilization, plan design leveraging, cost shifting, and new technology. The assumed ultimate trend rate and grade-down period are based on a long term projection of Gross Domestic Product (GDP) per capita.

Changes reflected in the September 30, 2025 benefit obligation

- The effective discount rate increased from 4.98% per annum to 5.30% per annum.
- The mortality improvement projection scale was updated from Scale MSS-2024 to Scale MSS-2025.
- The starting per-capita claims cost, premiums, retiree contributions, and RDS assumptions were updated to better reflect anticipated experience, taking into account actual experience over the past year, actual rates provided, and actual claims and enrollment from the RDS applications.
- The healthcare cost trend rates were updated to reflect Mercer’s most up-to-date trend model.

Section 4.3: Summary of plan provisions

				Deductible				Coinsurance			Copayment					
Grid #	Class ID's	Active Retire	Medical Program	Hospital	Medical / Surgical	Major Medical (MM)	Combined	Hospital	Medical / Surgical	Major Medical	PCP	Specialist	ER	OOP Maximum (deduct. not included)	Lifetime Maximum	Prescription Drugs
3	0C03	Active	Comprehensive Catastrophic				$1,000	80%	80%	80%				$2,000	Unlimited	
4	0C04, 0C27	Active	Comprehensive (PA)				$200	80%	80%	80%				$1,000 $1,900	Unlimited	
9	0C32, 0C33	Retiree	Comprehensive (PA)				$200	80%	80%	80%				$1,000 $1,900	$1,000,000	
5	0C05, 0C28	Active	Comprehensive (NY)				$200	80%	80%	80%				$1,000 $1,900	Unlimited	
10	0C10, 0C36	Retiree	Comprehensive (NY)				$200	80%	80%	80%				$1,000 $1,900	$1,000,000	
7	0C07, 0C30	Active	Comprehensive w/RX (NY)				$200	80%	80%	80%				$1,000 $1,900	Unlimited	80% after deductible
11	0C11, 0C37	Retiree	Comprehensive w/RX (NY)				$200	80%	80%	80%				$1,000 $1,900	$1,000,000	80% after deductible
8	0C08, 0C31	Active	Comprehensive w/RX (PA)				$200	80%	80%	80%				$1,000 $1,900	Unlimited	80% after deductible
12	0C12, 0C38	Retiree	Comprehensive w/RX (PA)				$200	80%	80%	80%				$1,000 $1,900	$1,000,000	80% after deductible
10	0P10	Active	PPO (NY, TX, PA & CA)				$0 in/$250 out	100% in network / 80% out			$10 in	$10 in	$20	$1,000 out	Unlimited	
	0P28	Retiree	PPO (NY)				$0 in/$250 out	100% in network / 80% out			$10 in	$15 in	$100	$1,000 out	$2,000,000	
	0P29	Retiree	PPO (PA)				$0 in/$250 out	100% in network / 80% out			$10 in	$15 in	$100	$1,000 out	$2,000,000	
12	0T12	Active	Indemnity (NY)	$0	$0	$50		100%	100%	80%				$400 MM	Unlimited	
13	0T13	Retiree	Indemnity (NY)	$0	$0	$50		100%	100%	80%				$400 MM	$1,000,000 MM	
15	0T15	Active	Indemnity (PA)	$0	$0	$100		100%	100%	80%				$400 MM	Unlimited	
16	0T16	Active	Executive	$0	$0	$0		100%	100%	100%				n/a	Unlimited	
17	0T17	Retiree	Indemnity (PA)	$0	$0	$100		100%	100%	80%				$400 MM	$1,250,000 MM	
27	0T27	Retiree	Executive	$0	$0	$0		100%	100%	100%				n/a	$1,500,000 MM / EM	

It is assumed that plans coordinate with Medicare on a carve-out basis.

"Variable Annual Rate Retirees"

Employee Group	Executives	NY Management	PA Management	Non-Union NY F/T Hourly	Non-Union PA F/T Hourly	IBEW LU 2154	IBEW LU 2154N	IBEW LU 2199 & 2199J	IBEW LU 2154P	IBEW LU 2154PN	NCFO/SEIU Chapter 22	NCFO/SEIU Chapter 22/22S
Active Benefit Eligibility Code	EXE	SPV, MDD	SPV, MDD	EXN	EXP	UPN	USR	UCN, UFE	UPP, UPR	SPR	UFN, UFP, UFQ, UFR	SFN, SFP
Retiree Benefit Eligibility Code	REX	R01	R02	R03	R04	R05	R06	R07	R08	R09	R10	R11
New Entrants	National Fuel Gas Company's postretirement medical and life insurance benefits plan was closed to new entrants at various dates in 2002 and 2003 for each employee group. The closed group is generally made up of "Variable Annual Rate Retirees and Future Retirees", "Post 2001 Grandfathered Retirees", and "Pre 2001 Grandfathered Retirees". Active employees who are in the closed group and therefore eligible for postretirement medical and life insurance benefits upon retirement must also meet the eligibility requirement below in order to receive benefits.											
Eligibility	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	12 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled
Retirement Date for "Variable Rate" Retirees	**N/A**	NYD, Supply: On or after 1/1/2008	PAD, Supply: On or after 1/1/2008	NYD, Supply: On or after 1/1/2008	PAD, Supply: On or after 1/1/2008	NYD, Supply: On or after 3/1/2008	NYD, Supply: On or after 3/1/2008	NYD, Supply: On or after 3/1/2008	PAD, Supply: On or after 5/1/2009	PAD, Supply: On or after 5/1/2009	PAD, Supply: On or after 6/1/2009	PAD, Supply: On or after 6/1/2009
Prescription Drug Plan	3-tier plan	3-tier plan	3-tier plan	3-tier plan	3-tier plan	3-tier plan	Included with medical plan if comprehensive elected	3-tier plan	3-tier plan	Included with medical plan if comprehensive elected	3-tier plan	Included with medical plan if comprehensive elected
Basic Life Insurance at Retirement	By individual	$15,000 max (50% of pay at time of retirement)	$15,000 max (50% of pay at time of retirement)	$7,500 reduction schedule 2	$5,000 reduction schedule 1	$7,500 reduction schedule 2	$7,500 reduction schedule 2	$7,500 reduction schedule 2	$5,000 reduction schedule 1	$5,000 reduction schedule 1	$5,000 reduction schedule 1	$5,000 reduction schedule 1
Supplemental Life Insurance at Retirement (if elected)	By individual	$10,000 max, ending at age 70 (50% of supplemental amount at time of retirement)	$10,000 max, ending at age 70 (50% of supplemental amount at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	None	None	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)
Medicare Part B Reimbursement (at the standard premium)	If disabled prior to age 65	If disabled prior to age 65	If disabled prior to age 65	If disabled prior to age 65	If disabled prior to age 65	Eligible	Eligible	If disabled prior to age 65	Eligible	Eligible	Eligible	Eligible
Surviving Spouse Benefit	Lifetime	Lifetime	Lifetime	Lifetime	Lifetime	Lifetime	Lifetime	Lifetime	36 months	36 months	Lifetime	Lifetime
Surviving Spouse Contribution	Based on retiree healthcare plan rates	Based on retiree healthcare plan rates	Based on retiree healthcare plan rates	Based on retiree healthcare plan rates	Based on retiree healthcare plan rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on retiree healthcare plan rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates

"Post 2001 Grandfathered Retirees"

Employee Group	Executives	Non-Union SRC Management	Non-Union NY Management	Non-Union PA Management	Non-Union NY F/T Hourly	Non-Union PA F/T Hourly	IBEW LU 2154	IBEW LU 2154N	IBEW LU 2199 & 2199J	IBEW LU 2154P	IBEW LU 2154PN	NCFO/SEIU Chapter 22	NCFO/SEIU Chapter 22/22S
Retiree Benefit Eligibility Code	REX RNY or RPA after 18 months	NHB	RNY	RPA	RNY	RPA	RNY	RNY	RNY	RPA	RPA	RPA	RPA
Retirement Date Closed to "Grandfathered" Retirees	N/A	N/A	1/1/2008	1/1/2008	1/1/2008	1/1/2008	3/1/2008	3/1/2008	3/1/2008	5/1/2009	5/1/2009	6/1/2009	6/1/2009
Prescription Drug Plan	$5/$10 Plan or Core Plan	N/A	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	Included with medical plan if comprehensive elected	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	Included with medical plan if comprehensive elected	$5/$10 Plan or Core Plan	Included with medical plan if comprehensive elected
Basic Life Insurance at Retirement	By individual	$15,000 max (50% of active rate at time of retirement)	$15,000 max (50% of active rate at time of retirement)	$15,000 max (50% of active rate at time of retirement)	$7,500 reduction schedule 2	$5,000 reduction schedule 1	$7,500 reduction schedule 2	$7,500 reduction schedule 2	$7,500 reduction schedule 2	$5,000 reduction schedule 1	$5,000 reduction schedule 1	$5,000 reduction schedule 1	$5,000 reduction schedule 1
Supplemental Life Insurance at Retirement (if elected)	By individual	$10,000 max, ending at age 70 (50% of supp amount at time of retirement)	$10,000 max, ending at age 70 (50% of supp amount at time of retirement)	$10,000 max, ending at age 70 (50% of supp amount at time of retirement)	$10,000 max, ending at age 70 (50% of supp amount at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	None	None	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)
Medicare Part B Reimbursement (at the standard premium)	If disabled prior to age 65	N/A	If disabled prior to age 65	If disabled prior to age 65	If disabled prior to age 65	If disabled prior to age 65	Eligible	Eligible	If disabled prior to age 65	Eligible	Eligible	Eligible	Eligible
Surviving Spouse Benefit	Lifetime	N/A	Lifetime	Lifetime	Lifetime	Lifetime	Lifetime	Lifetime	Lifetime	36 months	36 months	Lifetime	Lifetime
Surviving Spouse Contribution	By individual	N/A	Based on historical retiree rates	Based on historical retiree rates	Based on historical retiree rates	Based on historical retiree rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on historical retiree rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates

"Pre 2001 Grandfathered Retirees"

Employee Group	Executives	Non-Union SRC Management	Non-Union NY Management	Non-Union PA Management	Non-Union NY F/T Hourly	Non-Union PA F/T Hourly	IBEW LU 2154	IBEW LU 2154N	IBEW LU 2199 & 2199J	IBEW LU 2154P	IBEW LU 2154PN	NCFO/SEIU Chapter 22	NCFO/SEIU Chapter 22/22S
Retiree Benefit Eligibility Code	REX RNY or RPA after 18 months	NHB	RNY	RPA	RNY	RPA	RNY	RNY	RNY	RPA	RPA	RPA	RPA
Retirement Date Closed to "Grandfathered" Retirees	1/1/2001	N/A	1/1/2001	1/1/2001	1/1/2001	1/1/2001	1/1/2001	1/1/2001	1/1/2001	1/1/2001	1/1/2001	1/1/2001	1/1/2001
Prescription Drug Plan	$5/$10 Plan or Core Plan	N/A	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	Included with medical plan if comprehensive elected	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	Included with medical plan if comprehensive elected	$5/$10 Plan or Core Plan	Included with medical plan if comprehensive elected
Basic Life Insurance at Retirement	By individual	$15,000 maximum (50% of active rate at time of retirement)	$15,000 maximum (50% of active rate at time of retirement)	$15,000 maximum (50% of active rate at time of retirement)	$7,500 reduction schedule 2	$5,000 reduction schedule 1	$7,500 reduction schedule 2	$7,500 reduction schedule 2	$7,500 reduction schedule 2	$5,000 reduction schedule 1	$5,000 reduction schedule 1	$5,000 reduction schedule 1	$5,000 reduction schedule 1
Supplemental Life Insurance at Retirement (if elected)	By individual	$10,000 max, ending at age 70 (50% of supp rate at time of retirement)	$35,000 max, ending at age 70 (50% of active rate at time of retirement)	$35,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of supp amount at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	None	None	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)
Medicare Part B Reimbursement (at the standard premium)	Eligible	N/A	Eligible	Eligible	Eligible	Eligible	Eligible	Eligible	Eligible	Eligible	Eligible	Eligible	Eligible
Surviving Spouse Benefit	Lifetime	N/A	Lifetime	36 months	Lifetime	36 months	Lifetime	Lifetime	Lifetime	36 months	36 months	Lifetime	Lifetime
Surviving Spouse Contribution	Based on survinving spouse COBRA rates	N/A	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates

Additional Plan Details:

Prescription Drug Plan

Retiree copayments in the Core Plan are $0/$1 (generic/brand).
Retiree copayments in the $5/$10 Plan are $5/$10 (generic/brand).
Retiree copayments in the 3-tier Plan are $12.50/$24/$40 (generic/brand/specialty).

Basic Life Insurance Plan

Retirement Reduction Schedule 1
(Pennsylvania - Union & Non-Union Hourly)

60 & under	$12,500
61	$11,500
62	$10,500
63	$9,500
64	$8,500
65-69	$7,500
70 & over	$5,000

Retirement Reduction Schedule 2
(New York - Union & Non-Union Hourly)

60 & under	$12,500
61	$11,500
62	$10,500
63	$9,500
64	$8,500
65 & over	$7,500

Section 4.4: Claims cost development and medical rate information

Claim cost development

The claim costs were developed using the aggregate claims experience, separately for pre-65 and post-65 retirees, for the 36-month period ending December 2024 (for the 2025 disclosure) and December 2023 (for the 2024 disclosure and 2025 NPPBC) adjusted for the relative plan value, trend, and demographics of each individual plan. The prescription drug claim cost was also adjusted to reflect historical drug rebate information provided by National Fuel Gas Company. The pre-65 retiree experience was given credibility of 69% and the post-65 retiree experience was given full credibility.

Note, the medical plans described under grids 7, 8, 11, and 12 include prescription drug coverage. For valuation purposes, the prescription drug portion of the cost of these plans was valued separately. Since the prescription drug claims for plans under these grids were unavailable, this claim cost was developed by applying a relative value factor determined using actuarial equivalent rate relationships to the $5/$10 copayment plan claim cost.

Summary of premium rates for community rated plans

	Monthly premiums	
	2025	2024
Under 65 Rates (Independent Health FlexFit)		
Single, with Caremark	per Rx plan	per Rx plan
Single, w/o Caremark	$635.76	$582.62
Family, with Caremark	per Rx plan	per Rx plan
Family, w/o Caremark	1,716.54	1,573.08
Over 65 Rates (Independent Health Encompass 65)		
Single over	$240.00	$233.00
Two person over	480.00	466.00
One under/one over	875.76	815.62
Family, 1/more over	1,956.54	1,806.08

Retiree healthcare plan rates as of 1/1/2025

Below is a summary of the monthly retiree healthcare contribution amounts for those who retire after the 2008/2009 plan changes. For such retirees, the rates are assumed to change with healthcare trend throughout retirement, as described in Section 4.2. The contribution amounts shown are for medical and prescription drug coverage. For valuation purposes, they are allocated between medical and drug as described in Section 4.2.

Non-Medicare primary (pre-65)

Employee Group	Non-Union	IBEW LU 2154	IBEW LU 2154N	IBEW LU 2199 & 2199J	IBEW LU 2154P	IBEW LU 2154PN	NCFO/SEIU Chapter 22/22S	NCFO/SEIU Chapter 22/22S
Retiree Contribution Changes	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025
Active Benefit Eligibility Code	SPV, EXN, EXP	UPN	USR	UCN, UFE	UPP, UPR	SPR	UFN, UFP, UFQ, UFR	SFN, SFP
Retiree Benefit Eligibility Code	R01, R02, R03, R04	R05	R06	R07	R08	R09	R10	R11
SINGLE COVERAGE								
Indemnity	178.00	231.20	N/A	231.20	231.20	N/A	231.20	N/A
Comprehensive	157.40	N/A	N/A	N/A	204.50	N/A	204.50	N/A
Comprehensive w/RX	N/A	N/A	180.20	N/A	N/A	180.20	N/A	180.20
PPO	167.00	217.00	155.50	217.00	217.00	155.50	217.00	N/A
IHA FlexFit	169.70	220.40	158.90	220.40	N/A	N/A	N/A	N/A
FAMILY COVERAGE								
Indemnity	483.30	627.70	N/A	627.70	627.70	N/A	627.70	N/A
Comprehensive	426.70	N/A	N/A	N/A	554.20	N/A	554.20	N/A
Comprehensive w/RX	N/A	N/A	459.20	N/A	N/A	459.20	N/A	459.20
PPO	453.20	588.70	421.00	588.70	588.70	421.00	588.70	N/A
IHA FlexFit	459.60	596.80	429.10	596.80	N/A	N/A	N/A	N/A

Retiree healthcare plan rates as of 1/1/2025 (continued)

Medicare primary (post-65)

Employee Group	Non-Union	IBEW LU 2154	IBEW LU 2154N	IBEW LU 2199 & 2199J	IBEW LU 2154P	IBEW LU 2154PN	NCFO/SEIU Chapter 22/22S	NCFO/SEIU Chapter 22/22S
Retiree Contribution Changes	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025
Active Benefit Eligibility Code	SPV, EXN, EXP	UPN	USR	UCN, UFE	UPP, UPR	SPR	UFN, UFP, UFQ, UFR	SFN, SFP
Retiree Benefit Eligibility Code	R01, R02, R03, R04	R05	R06	R07	R08	R09	R10	R11
SINGLE COVERAGE								
Indemnity	150.30	195.20	N/A	195.20	195.20	N/A	195.20	N/A
Comprehensive	144.90	N/A	N/A	N/A	188.20	N/A	188.20	N/A
Comprehensive w/RX	N/A	N/A	105.50	N/A	N/A	105.50	N/A	105.50
PPO	145.90	189.50	62.00	189.50	189.50	62.00	189.50	N/A
IHA Encompass 65	144.30	187.50	60.00	187.50	N/A	N/A	N/A	N/A
Forever Blue, In-Area	126.40	164.20	N/A	164.20	N/A	N/A	N/A	N/A
Forever Blue, Out-of-Area	139.30	181.00	N/A	181.00	181.00	N/A	181.00	N/A
FAMILY COVERAGE								
Indemnity	301.80	392.00	N/A	392.00	392.00	N/A	392.00	N/A
Comprehensive	287.40	N/A	N/A	N/A	373.20	N/A	373.20	N/A
Comprehensive w/RX	N/A	N/A	210.70	N/A	N/A	210.70	N/A	210.70
PPO	291.20	378.20	122.00	378.20	378.20	122.00	378.20	N/A
IHA Encompass 65	289.70	376.20	120.00	376.20	N/A	N/A	N/A	N/A
Forever Blue, In-Area	253.90	329.70	N/A	329.70	N/A	N/A	N/A	N/A
Forever Blue, Out-of-Area	279.70	363.20	N/A	363.20	363.20	N/A	363.20	N/A

Summary of historical retiree healthcare plan rates

Below is a summary of the monthly retiree healthcare contribution amounts for those who retired prior to the 2008/2009 plan changes. For such retirees there is no additional contribution for spousal/dependent coverage and the contribution amount determined at retirement does not change with healthcare trend or Medicare status. Further, the whole contribution is allocated to medical coverage.

Blue Cross/Blue Shield Plan	Monthly Contribution	Effective Date
1. Participants who retired prior to 1/1/1991	$0.00	N/A
2. Participants who retired 1/1/1991 - 2/29/2008:		
a) Comprehensive 80/20 Plan[1]	$0.00	N/A
b) Locals 2154, 2199, and 2199J IBEW (NY)	$21.66	2/17/1991
Hired on/before 4/13/1996	$26.00	2/16/1992
	$30.33	2/16/1993
	$34.66	2/13/1994
	$39.00	2/11/1996
	$39.00	thru 2/14/2008
c) Local 2154P (formerly Local 2279 IBEW) (PA)[2]	$21.66	4/13/1991
Hired on/before 4/13/1996, retired prior to 5/1/2009 and selected Indemnity Plan (Note: retirees that selected the PPO Plan have no monthly contributions).	$22.53	4/13/1992
	$28.16	4/13/1993
	$28.16	4/13/1994
	$28.16	4/13/1995
	$34.58	6/1/1996
	$44.29	6/1/1997
	$50.40	7/1/1998
	$63.14	4/13/2002
	$70.46	4/13/2003
	$68.00	1/1/2004
	$71.00	4/13/2005
	$88.00	4/10/2006
	$113.00	1/1/2007
	$117.05	1/1/2008
	$117.05	thru 5/1/2009
d) NCFO/SEIU, Chapter 22	$11.91	5/1/1991
Hired on/before 5/1/1996	$21.66	5/1/1992
	$28.16	5/1/1993
	$34.66	5/1/1994
	$39.00	5/1/1995
	$43.33	5/1/1999
	$47.66	5/1/2000
	$52.00	5/1/2001
	$52.00	thru 5/1/2009

[1] Amount applies to union and non-union retirees in the comprehensive plan.

[2] If the company cost increases over 5%, the percentage above 5% will be shared jointly 50/50 between the employee and the Company.

Summary of historical retiree healthcare plan rates (continued)

Blue Cross/Blue Shield Plan		Monthly Contribution	Effective Date
e)	Non-Union Non-Supervisory Employees	$21.66	7/1/1991
	Hired on/before 6/1/2003	$26.00	1/1/1993
		$28.16	11/1/1993
		$32.50	1/1/1995
		$36.83	1/1/1997
		$47.97	1/1/2000
		$51.00	1/1/2001
		$56.00	1/1/2002
		$61.00	1/1/2003
		$68.00	1/1/2004
		$71.00	1/1/2005
		$88.00	1/1/2006
		$120.00	1/1/2007
		$120.00	thru 1/1/2008
f)	Supervisory/Excluded, Executive employees and Seneca Resources, not in POS plan	10% of benefit at retirement	
	Hired on/before 6/1/2003	$28.00	1/1/1991
		$30.00	1/1/1992
		$33.00	1/1/1993
		$37.00	1/1/1994
		$37.00	1/1/1995
		$33.00	1/1/1996
		$37.00	1/1/1997
		$42.00	1/1/1999
		$48.00	1/1/2000
		$51.00	1/1/2001
		$56.00	1/1/2002
		$61.00	1/1/2003
		$68.00	1/1/2004
		$71.00	1/1/2005
		$88.00	1/1/2006
		$120.00	1/1/2007
		$120.00	thru 1/1/2008
g)	Supervisory/Excluded, Executive employees, in POS plan	$56.00	1/1/2002
	Hired prior to 6/1/2003	$61.00	1/1/2003
		$68.00	1/1/2004
		$71.00	1/1/2005
		$88.00	1/1/2006
		$120.00	1/1/2007
		$120.00	thru 1/1/2008

Summary of historical retiree healthcare plan rates (continued)

Retirees under age 65 who participate in a community rated plan pay the contribution amount identified earlier in this section– based on the group they are in – plus an active differential. Retirees who are age 65 and over and participate in a community rated plan pay only the amount identified earlier in this section.

The monthly active differentials for 1991 through 2025 are as follows:

Year of Retirement	Independent Health	
	Single	Family
1991	$4.48	$9.36
1992	$5.40	$11.76
1993	$5.01	$11.05
1994	$0.00	$0.00
1995	$2.40	$2.88
1996	$11.12	$25.60
1997	$0.00	$0.00
1998	$0.00	$0.00
1999	$0.00	$29.92
2000	$0.00	$0.00
2001	$3.92	$45.64
2002	$0.00	$41.40
2003 - 2025	$0.00	$0.00

Surviving spouse contribution rates

If a participant retires on or after 1/1/2001 and is either 1) management, 2) non-union hourly, 3) union division 2199, or 4) union division 2199-J, then the surviving spouse contribution upon that retiree's death is the same amount that the retiree was contributing. For all other retirees, the surviving spouse contribution is as shown in this section.

Carrier & Plan Names	2024		2025	
	Single	Family	Single	Family
BlueCross BlueShield of Western New York				
Indemnity (Traditional)				
Non Medicare Primary (Under 65)	$840.00	$2,090.00	$998.00	$2,480.00
Medicare Primary (Over 65)	$232.00	$464.00	$271.00	$543.00
Comprehensive 80/20				
Non Medicare Primary (Under 65)	$445.00	$1,216.00	$529.00	$1,443.00
Medicare Primary (Over 65)	$208.00	$400.00	$243.00	$468.00
Comprehensive 80/20 with Rx				
Non Medicare Primary (Under 65)	$607.00	$1,548.00	$721.00	$1,837.00
Medicare Primary (Over 65)	$361.00	$720.00	$422.00	$843.00
PPO Plan				
Non Medicare Primary (Under 65)	$645.00	$1,779.00	$766.00	$2,111.00
Medicare Primary (Over 65)	$212.00	$417.00	$248.00	$488.00
Executives (includes BCBSWNY Indemnity)				
Under and Over 65	$744.00	$2,018.00	$801.00	$2,173.00
Independent Health				
FlexFit				
Non Medicare Primary (Under 65)	$582.62	$1,573.08	$635.76	$1,716.54
Encompass 65				
Medicare Primary (Over 65)	$233.00	$466.00	$240.00	$480.00
Forever Blue PPO 799 (Over 65)				
In-Area	$137.00	$274.00	$147.00	$294.00
Out-of-Area	$200.00	$400.00	$214.00	$428.00
CVS Caremark Prescription Drug:				
$0/$1 Core Plan	$586.00	$1,179.00	$682.00	$1,373.00
$5/$10 Core Plan	$564.00	$1,131.00	$656.00	$1,317.00
3-Tier Plan ($12.50/$24.00/$40.00 Copays)	$438.00	$881.00	$510.00	$1,025.00

Appendices

Appendix A These exhibits summarize the net periodic postretirement benefit cost for the fiscal year ending September 30, 2025 by division and employment status (bargaining and non-bargaining).

Appendix B These exhibits summarize the reconciliation of funded status for the fiscal year ending September 30, 2025 by division and employment status (bargaining and non-bargaining).

Appendix A: NPPBC for fiscal year ending September 30, 2025

	New York Distribution	Pennsylvania Distribution	Supply	SRC	Parent	Empire Pipeline	Midstream	Total
Collectively Bargained Employees								
1. Service Cost	189,663	7,034	94,999	0	0	0	0	291,696
2. Interest Cost[1]								
a. Beginning of year APBO	115,604,120	31,289,817	43,462,456	0	0	0	0	190,356,393
b. Weighted benefit payments	4,797,288	1,287,475	1,627,032	0	0	0	0	7,711,795
c. Average APBO = a. - b.	110,806,832	30,002,342	41,835,424	0	0	0	0	182,644,598
d. Discount rate	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%
e. Interest cost = c. x d.	5,200,030	1,407,974	1,963,286	0	0	0	0	8,571,290
3. Expected Return on Assets								
a. Beginning of year assets	191,499,183	62,007,691	61,812,613	0	0	0	0	315,319,487
b. Weighted benefit payments	4,797,288	1,287,475	1,627,032	0	0	0	0	7,711,795
c. Weighted contributions	0	0	0	0	0	0	0	0
d. Average assets = a. - b. + c.	186,701,895	60,720,216	60,185,581	0	0	0	0	307,607,692
e. Rate of return	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%
f. Expected return = d. x e.	10,081,902	3,278,892	3,250,021	0	0	0	0	16,610,815
4. Amortizations								
a. Transition (asset) / obligation	0	0	0	0	0	0	0	0
b. Prior service (credit) / cost	(184,312)	(49,131)	(66,795)	0	0	0	0	(300,238)
c. (Gains) / losses								
Corridor		0	0	0	0	0	0	0
Vintage 1	1,201,693							
Vintage 2	2,603,605							
Vintage 3	(2,982,108)							
Vintage 4	(545,455)							
Vintage 5	1,281,986							
Vintage 6	(254,407)							
Vintage 7	(2,751,644)							
Vintage 8	605,825							
Vintage 9	(673,954)							
Vintage 10	140,538							
Vintage Total	(1,373,921)							(1,373,921)
d. Total amortizations	(1,558,233)	(49,131)	(66,795)	0	0	0	0	(1,674,159)
5. Net Postretirement Benefit Cost / (Income) = 1. + 2.e. - 3.f. + 4.d.	**(6,250,442)**	**(1,913,015)**	**(1,258,531)**	**0**	**0**	**0**	**0**	**(9,421,988)**

[1] The Interest Cost is determined using a spot-rate approach by applying the specific rates along the Above Mean Mercer Yield Curve to the relevant cash flows. The calculation presented here shows the application of the resulting effective rate for interest applied to the APBO (adjusted for expected benefit payments), which yields the same result. Although the effective rate for interest on the APBO is shown to two decimal places, the actual rate is unrounded.

Appendix A: NPPBC for fiscal year ending September 30, 2025

	New York Distribution	Pennsylvania Distribution	Supply	SRC	Parent	Empire Pipeline	Midstream	Total
Non-Collectively Bargained Employees								
1. Service Cost	143,711	22,983	52,364	475	0	0	7,752	227,285
2. Interest Cost[1]								
a. Beginning of year APBO	63,156,676	26,584,683	37,416,002	1,712,928	1,614,830	0	183,354	130,668,473
b. Weighted benefit payments	2,098,344	884,236	1,215,598	53,282	56,796	0	0	4,308,256
c. Average APBO = a. - b.	61,058,332	25,700,447	36,200,404	1,659,646	1,558,034	0	183,354	126,360,217
d. Discount rate	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%
e. Interest cost = c. x d.	2,865,393	1,206,091	1,698,841	77,885	73,117	0	8,604	5,929,931
3. Expected Return on Assets								
a. Beginning of year assets	89,026,611	44,306,884	47,411,817	0	0	0	0	180,745,312
b. Weighted benefit payments	2,098,344	884,236	1,215,598	53,282	56,796	0	0	4,308,256
c. Weighted contributions	0	0	0	53,282	56,796	0	0	110,078
d. Average assets = a. - b. + c.	86,928,267	43,422,648	46,196,219	0	0	0	0	176,547,134
e. Rate of return	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%
f. Expected return = d. x e.	4,694,126	2,344,823	2,494,596	0	0	0	0	9,533,545
4. Amortizations								
a. Transition (asset) / obligation	0	0	0	0	0	0	0	0
b. Prior service (credit) / cost	(67,680)	(23,496)	(34,646)	(2,311)	(318)	0	0	(128,451)
c. (Gains) / losses								
Corridor		846,123	324,628	(20,188)	(65,088)	(1,900)	(58,331)	1,025,244
Vintage 1	628,665							
Vintage 2	1,265,581							
Vintage 3	(1,350,991)							
Vintage 4	(253,163)							
Vintage 5	892,053							
Vintage 6	110,074							
Vintage 7	(1,267,259)							
Vintage 8	(410,172)							
Vintage 9	53,910							
Vintage 10	716,991							
Vintage Total	385,689							385,689
d. Total amortizations	318,009	822,627	289,982	(22,499)	(65,406)	(1,900)	(58,331)	1,282,482
5. Net Postretirement Benefit Cost / (Income) = 1. + 2.e. - 3.f. + 4.d.	**(1,367,013)**	**(293,122)**	**(453,409)**	**55,861**	**7,711**	**(1,900)**	**(41,975)**	**(2,093,847)**

[1] The Interest Cost is determined using a spot-rate approach by applying the specific rates along the Above Mean Mercer Yield Curve to the relevant cash flows. The calculation presented here shows the application of the resulting effective rate for interest applied to the APBO (adjusted for expected benefit payments), which yields the same result. Although the effective rate for interest on the APBO is shown to two decimal places, the actual rate is unrounded.

Appendix A: NPPBC for fiscal year ending September 30, 2025

	New York Distribution	Pennsylvania Distribution	Supply	SRC	Parent	Empire Pipeline	Midstream	Total
All Employees								
1. Service Cost	333,374	30,017	147,363	475	0	0	7,752	518,981
2. Interest Cost[1]								
a. Beginning of year APBO	178,760,796	57,874,500	80,878,458	1,712,928	1,614,830	0	183,354	321,024,866
b. Weighted benefit payments	6,895,632	2,171,711	2,842,630	53,282	56,796	0	0	12,020,051
c. Average APBO = a. - b.	171,865,164	55,702,789	78,035,828	1,659,646	1,558,034	0	183,354	309,004,815
d. Discount rate	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%
e. Interest cost = c. x d.	8,065,423	2,614,065	3,662,127	77,885	73,117	0	8,604	14,501,221
3. Expected Return on Assets								
a. Beginning of year assets	280,525,794	106,314,575	109,224,430	0	0	0	0	496,064,799
b. Weighted benefit payments	6,895,632	2,171,711	2,842,630	53,282	56,796	0	0	12,020,051
c. Weighted contributions	0	0	0	53,282	56,796	0	0	110,078
d. Average assets = a. - b. + c.	273,630,162	104,142,864	106,381,800	0	0	0	0	484,154,826
e. Rate of return	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%
f. Expected return = d. x e.	14,776,028	5,623,715	5,744,617	0	0	0	0	26,144,360
4. Amortizations								
a. Transition (asset) / obligation	0	0	0	0	0	0	0	0
b. Prior service (credit) / cost	(251,992)	(72,627)	(101,441)	(2,311)	(318)	0	0	(428,689)
c. (Gains) / losses								
Corridor		846,123	324,628	(20,188)	(65,088)	(1,900)	(58,331)	1,025,244
Vintage 1	1,830,358							
Vintage 2	3,869,186							
Vintage 3	(4,333,099)							
Vintage 4	(798,618)							
Vintage 5	2,174,039							
Vintage 6	(144,333)							
Vintage 7	(4,018,903)							
Vintage 8	195,653							
Vintage 9	(620,044)							
Vintage 10	857,529							
Vintage Total	(988,232)							(988,232)
d. Total amortizations	(1,240,224)	773,496	223,187	(22,499)	(65,406)	(1,900)	(58,331)	(391,677)
5. Net Postretirement Benefit Cost / (Income) = 1. + 2.e. - 3.f. + 4.d.	**(7,617,455)**	**(2,206,137)**	**(1,711,940)**	**55,861**	**7,711**	**(1,900)**	**(41,975)**	**(11,515,835)**

[1] The Interest Cost is determined using a spot-rate approach by applying the specific rates along the Above Mean Mercer Yield Curve to the relevant cash flows. The calculation presented here shows the application of the resulting effective rate for interest applied to the APBO (adjusted for expected benefit payments), which yields the same result. Although the effective rate for interest on the APBO is shown to two decimal places, the actual rate is unrounded.

Appendix B: Reconciliation of funded status as of September 30, 2025

	New York Distribution	Pennsylvania Distribution	Supply	SRC	Parent	Empire Pipeline	Midstream	Total
Collectively Bargained Employees								
1. Accumulated Postretirement Benefit Obligation (APBO)								
a. Inactives	105,512,620	31,203,011	39,539,722	0	0	0	0	176,255,353
b. Actives fully eligible	6,879,679	1,235,317	4,004,651	0	0	0	0	12,119,647
c. Actives not fully eligible	4,417,430	280,448	2,072,969	0	0	0	0	6,770,847
d. Total APBO	116,809,729	32,718,776	45,617,342	0	0	0	0	195,145,847
2. Fair Value of Assets	192,134,828	63,389,292	62,327,383	0	0	0	0	317,851,503
3. Funded Status = 2. - 1d.	**75,325,099**	**30,670,516**	**16,710,041**	**0**	**0**	**0**	**0**	**122,705,656**
4. Unrecog Transition (Asset)/Obligation	0	0	0	0	0	0	0	0
5. Unrecog Prior Service (Credit)/Cost	(110,585)	(29,485)	(40,066)	0	0	0	0	(180,136)
6. Unrecog (Gains)/Losses								
Corridor		7,116,782	4,637,079	0	0	0	0	11,753,861
Vintage 1	2,603,606							
Vintage 2	(5,964,217)							
Vintage 3	(1,636,361)							
Vintage 4	5,127,945							
Vintage 5	(1,272,033)							
Vintage 6	(16,509,863)							
Vintage 7	4,240,777							
Vintage 8	(5,391,634)							
Vintage 9	1,264,841							
Vintage 10	4,599,082							
Vintage Total	(12,937,857)							(12,937,857)
7. Accumulated other comprehensive income (AOCI) [- (4. + 5. + 6.)]	**13,048,442**	**(7,087,297)**	**(4,597,013)**	**0**	**0**	**0**	**0**	**1,364,132**
8. Cumulative employer contributions in excess of net periodic benefit cost (3. - 7.)	62,276,657	37,757,813	21,307,054	0	0	0	0	121,341,524
9. Net amount recognized in statement of financial position (7. + 8.)	**75,325,099**	**30,670,516**	**16,710,041**	**0**	**0**	**0**	**0**	**122,705,656**
Amounts recognized in the statement of financial position consist of								
Noncurrent assets	75,325,099	30,670,516	16,710,041	0	0	0	0	122,705,656
Current liabilities	0	0	0	0	0	0	0	0
Noncurrent liabilities	0	0	0	0	0	0	0	0
Net amount recognized at year end	**75,325,099**	**30,670,516**	**16,710,041**	**0**	**0**	**0**	**0**	**122,705,656**

Appendix B: Reconciliation of funded status as of September 30, 2025

	New York Distribution	Pennsylvania Distribution	Supply	SRC	Parent	Empire Pipeline	Midstream	Total
Non-Collectively Bargained Employees								
1. Accumulated Postretirement Benefit Obligation (APBO)								
a. Inactives	51,303,052	22,511,928	30,713,516	1,458,636	1,734,452	0	0	107,721,584
b. Actives fully eligible	10,633,405	4,362,488	7,311,542	291,922	0	0	0	22,599,357
c. Actives not fully eligible	3,547,199	222,922	1,126,111	12,515	0	0	208,172	5,116,919
d. Total APBO	65,483,656	27,097,338	39,151,169	1,763,073	1,734,452	0	208,172	135,437,860
2. Fair Value of Assets	88,142,257	43,292,892	46,818,928	0	0	0	0	178,254,077
3. Funded Status = 2. - 1d.	**22,658,601**	**16,195,554**	**7,667,759**	**(1,763,073)**	**(1,734,452)**	**0**	**(208,172)**	**42,816,217**
4. Unrecog Transition (Asset)/Obligation	0	0	0	0	0	0	0	0
5. Unrecog Prior Service (Credit)/Cost	(40,614)	(14,092)	(20,791)	(1,391)	(186)	0	0	(77,074)
6. Unrecog (Gains)/Losses								
Corridor		9,571,623	8,689,311	(212,068)	(205,478)	(5,812)	(188,368)	17,649,208
Vintage 1	1,265,576							
Vintage 2	(2,701,977)							
Vintage 3	(759,493)							
Vintage 4	3,568,210							
Vintage 5	550,371							
Vintage 6	(7,603,554)							
Vintage 7	(2,871,207)							
Vintage 8	431,279							
Vintage 9	6,452,919							
Vintage 10	5,015,850							
Vintage Total	3,347,974							3,347,974
7. Accumulated other comprehensive income (AOCI) [- (4. + 5. + 6.)]	**(3,307,360)**	**(9,557,531)**	**(8,668,520)**	**213,459**	**205,664**	**5,812**	**188,368**	**(20,920,108)**
8. Cumulative employer contributions in excess of net periodic benefit cost (3. - 7.)	25,965,961	25,753,085	16,336,279	(1,976,532)	(1,940,116)	(5,812)	(396,540)	63,736,325
9. Net amount recognized in statement of financial position (7. + 8.)	**22,658,601**	**16,195,554**	**7,667,759**	**(1,763,073)**	**(1,734,452)**	**0**	**(208,172)**	**42,816,217**
Amounts recognized in the statement of financial position consist of								
Noncurrent assets	22,658,601	16,195,554	7,667,759	0	0	0	0	46,521,914
Current liabilities	0	0	0	(112,080)	(112,368)	0	(4)	(224,452)
Noncurrent liabilities	0	0	0	(1,650,993)	(1,622,084)	0	(208,168)	(3,481,245)
Net amount recognized at year end	**22,658,601**	**16,195,554**	**7,667,759**	**(1,763,073)**	**(1,734,452)**	**0**	**(208,172)**	**42,816,217**

Appendix B: Reconciliation of funded status as of September 30, 2025

	New York Distribution	Pennsylvania Distribution	Supply	SRC	Parent	Empire Pipeline	Midstream	Total
All Employees								
1. Accumulated Postretirement Benefit Obligation (APBO)								
a. Inactives	156,815,672	53,714,939	70,253,238	1,458,636	1,734,452	0	0	283,976,937
b. Actives fully eligible	17,513,084	5,597,805	11,316,193	291,922	0	0	0	34,719,004
c. Actives not fully eligible	7,964,629	503,370	3,199,080	12,515	0	0	208,172	11,887,766
d. Total APBO	182,293,385	59,816,114	84,768,511	1,763,073	1,734,452	0	208,172	330,583,707
2. Fair Value of Assets	280,277,085	106,682,184	109,146,311	0	0	0	0	496,105,580
3. Funded Status = 2. - 1d.	**97,983,700**	**46,866,070**	**24,377,800**	**(1,763,073)**	**(1,734,452)**	**0**	**(208,172)**	**165,521,873**
4. Unrecog Transition (Asset)/Obligation	0	0	0	0	0	0	0	0
5. Unrecog Prior Service (Credit)/Cost	(151,199)	(43,577)	(60,857)	(1,391)	(186)	0	0	(257,210)
6. Unrecog (Gains)/Losses								
Corridor		16,688,405	13,326,390	(212,068)	(205,478)	(5,812)	(188,368)	29,403,069
Vintage 1	3,869,182							
Vintage 2	(8,666,194)							
Vintage 3	(2,395,854)							
Vintage 4	8,696,155							
Vintage 5	(721,662)							
Vintage 6	(24,113,417)							
Vintage 7	1,369,570							
Vintage 8	(4,960,355)							
Vintage 9	7,717,760							
Vintage 10	9,614,932							
Vintage Total	(9,589,883)							(9,589,883)
7. Accumulated other comprehensive income (AOCI) [- (4. + 5. + 6.)]	**9,741,082**	**(16,644,828)**	**(13,265,533)**	**213,459**	**205,664**	**5,812**	**188,368**	**(19,555,976)**
8. Cumulative employer contributions in excess of net periodic benefit cost (3. - 7.)	88,242,618	63,510,898	37,643,333	(1,976,532)	(1,940,116)	(5,812)	(396,540)	185,077,849
9. Net amount recognized in statement of financial position (7. + 8.)	**97,983,700**	**46,866,070**	**24,377,800**	**(1,763,073)**	**(1,734,452)**	**0**	**(208,172)**	**165,521,873**
Amounts recognized in the statement of financial position consist of								
Noncurrent assets	97,983,700	46,866,070	24,377,800	0	0	0	0	169,227,570
Current liabilities	0	0	0	(112,080)	(112,368)	0	(4)	(224,452)
Noncurrent liabilities	0	0	0	(1,650,993)	(1,622,084)	0	(208,168)	(3,481,245)
Net amount recognized at year end	**97,983,700**	**46,866,070**	**24,377,800**	**(1,763,073)**	**(1,734,452)**	**0**	**(208,172)**	**165,521,873**

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A business of Marsh McLennan

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-J-Payroll, Benefits, and Retiree Costs
Delivered on January 28, 2026

III-J.8

Request:

List and explain all non-recurring abnormal or extraordinary expenses related to employee costs incurred in the HTY which will not be present in the FTY or the FPFTY. List and explain all non-recurring abnormal or extraordinary expenses related to employee costs expected to be incurred in the FTY or FPFTY which were not present in the HTY.

Response:

There are no expenses of this nature.

Prepared by or under the supervision of: Michael P Weidner

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-J-Payroll, Benefits, and Retiree Costs
Delivered on January 28, 2026

III-J.9

Request:

List and explain expenses related to employee costs included in the HTY, the FTY and the FPFTY which do not occur yearly but are of a nature that they do occur within an extended period of years.

Response:

There are no expenses of this nature.

Prepared by or under the supervision of: Michael P Weidner

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-K-Depreciation
Delivered on January 28, 2026

III-K.1

Request:

Provide a description of the depreciation methods used to calculate annual depreciation amounts and depreciation reserves, together with a discussion of the factors which were considered in arriving at estimates of service life and dispersion by account. Provide a comprehensive statement of any changes made in the method of depreciation since the immediately preceding base rate case

Response:

The depreciation methods utilized in calculating annual and accrued depreciation are discussed in Exhibit No. C-Future in the section titled, "Calculation of Annual and Accrued Depreciation" beginning on page IV-2. The factors considered in arriving at estimates of service life and dispersion by account, begin in the section on page III-2 and continuing through page III-7.

The depreciation methods and procedures used in this filing are the same as those used in previous filings. Explanations of the depreciation methods and procedures are presented in Exhibit No. C-Future.

The estimated survivor curves used in this filing have not changed from those used in the most recent service life study filed in May 2023 and annual depreciation report filed in March 2025.

Field trips and facilities visited over the years for National Fuel Gas Distribution Corporation are presented in Exhibit No. C-Future, in the section "Field Trips", beginning on page III-2.

Prepared by or under the supervision of: John J. Spanos

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-K-Depreciation
Delivered on January 28, 2026

III-K.2

Request:

Provide a description of the amortization methods used to calculate annual amortization amounts and amortization reserves FOR THOSE PROPERTY ACCOUNTS FOR WHICH AN AMORTIZATION METHOD IS EMPLOYED. Provide a comprehensive statement of any changes made in the method of amortization since the immediately preceding base rate case.

Response:

Please see pages II-7 through II-61 of Exhibit C-Historic for the surviving original cost as of September 30, 2025 by vintage by account with the applicable book reserve, future accruals and annual accruals.

Prepared by or under the supervision of: John J. Spanos

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-K-Depreciation
Delivered on January 28, 2026

III-K.3

Request:

Provide an exhibit and charts depicting the original and estimated survivor curves and a table presenting the original life table plotted on the chart for each account where the retirement rate method of analysis is used. THE ORIGINAL SURVIVOR CURVE IS THE SURVIVOR CURVE DRAWN THROUGH THE POINTS CALCULATED FROM THE ORIGINAL DATA WITHOUT ADJUSTMENT. WHERE AN ORIGINAL SURVIVOR CURVE ENDS AT A PERCENT SURVIVING THAT IS GREATER THAN ZERO, OR WHERE IT IS DESIRABLE TO ELIMINATE IRREGULARITIES, THE ORIGINAL SURVIVOR CURVE MAY BE SMOOTHED USING AN ADJUSTED, OR ESTIMATED, SURVIVOR CURVE. DIFFERENT ADJUSTED SURVIVOR CURVES MAY BE EVALUATED TO DECIDE WHICH CURVE APPEARS TO BE THE BEST FIT.

Response:

The service life statistics which sets forth smooth survivor curves and original life tables by account are set forth in the section beginning on page VI-1 of Exhibit No. C-Future. These service life statistics set forth the last service life study performed consistent with Pennsylvania regulations.

Prepared by or under the supervision of: John J. Spanos

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-K-Depreciation
Delivered on January 28, 2026

III-K.4

Request:

Provide the surviving original cost at the HTY year-end by vintage by account and include applicable depreciation reserves and accruals. Provide these calculations for plant in service as well as other categories of plant, including contributions in aid of construction and customers' advances for construction, and anticipated retirements associated with any CWIP claims if applicable.

Response:

Please see pages II-7 through II-61 of Exhibit C-Historic for the surviving original cost as of September 30, 2025 by vintage by account with the applicable book reserve, future accruals and annual accruals.

Prepared by or under the supervision of: John J. Spanos

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-K-Depreciation
Delivered on January 28, 2026

III-K.5

Request:

Provide a comparison of the calculated depreciation reserve used for ratemaking purposes compared to the book reserve by account at the end of the HTY, the FTY and the FPFTY.

Response:

A comparison of the calculated accrued depreciation (calculated depreciation reserve) vs. book reserve by account as of September 30, 2025, is listed on Pages 2 and 3 of this response.

See Pages 4 through 7 for the comparison of the calculated accrued depreciation (calculated depreciation reserve) vs. book reserve as of September 30, 2026 and as of October 31, 2027.

Prepared by or under the supervision of: John J. Spanos

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

COMPARISON OF CALCULATED ACCRUED DEPRECIATION AND
BOOK DEPRECIATION RESERVE AS OF SEPTEMBER 30, 2025

	DEPRECIABLE GROUP	CALCULATED ACCRUED DEPRECIATION	BOOK DEPRECIATION RESERVE
	(1)	(2)	(3)
DEPRECIABLE PLANT			
303	MISCELLANEOUS INTANGIBLE PLANT	20,978,969	20,948,041
PRODUCTION PLANT			
325.4	RIGHTS OF WAY	29,673	36,419
328	MEASURING AND REGULATING STATION STRUCTURES	9,058	9,957
329	OTHER STRUCTURES	1,408	1,384
332	FIELD LINES	199,094	169,496
334	MEASURING AND REGULATING STATION EQUIPMENT	1,429,423	1,706,176
TOTAL PRODUCTION PLANT		**1,668,656**	**1,923,431**
TRANSMISSION PLANT			
365.2	RIGHTS OF WAY	620,296	665,680
366.2	MEASURING AND REGULATING STATION STRUCTURES	122,124	116,213
366.3	OTHER STRUCTURES	3,013	3,637
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	17,759,984	19,860,314
367.2	MAINS - CATHODIC PROTECTION	2,100,884	2,211,073
369	MEASURING AND REGULATING STATION EQUIPMENT		
	1980 AND PRIOR	264,549	290,200
	1981 AND SUBSEQUENT	2,652,404	4,094,495
	TOTAL ACCOUNT 369	2,916,953	4,384,695
TOTAL TRANSMISSION PLANT		**23,523,254**	**27,241,612**
DISTRIBUTION PLANT			
374.2	RIGHTS OF WAY	3,062,896	3,275,141
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	5,002,482	5,863,903
375.4	STRUCTURES AND IMPROVEMENTS - SMALL	299,594	320,500
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	116,815,979	109,664,023
376.2	MAINS - CATHODIC PROTECTION	1,491,471	1,684,792
378	MEASURING AND REGULATING STATION EQUIPMENT	4,108,563	3,971,454
380	SERVICES	76,829,138	83,883,689
381	METERS	5,994,546	6,166,777
382	METER INSTALLATIONS	1,636,039	1,888,692
384	HOUSE REGULATOR INSTALLATIONS	469,079	590,253
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	6,162,562	7,198,874
TOTAL DISTRIBUTION PLANT		**221,872,349**	**224,508,098**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

COMPARISON OF CALCULATED ACCRUED DEPRECIATION AND
BOOK DEPRECIATION RESERVE AS OF SEPTEMBER 30, 2025

	DEPRECIABLE GROUP	CALCULATED ACCRUED DEPRECIATION	BOOK DEPRECIATION RESERVE
	(1)	(2)	(3)
GENERAL PLANT			
390.11	OTHER SMALL STRUCTURES	80,677	30,192
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	110,154	128,890
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	208,035	218,003
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	3,786,812	3,372,033
392	TRANSPORTATION EQUIPMENT	6,913,935	6,913,935
394	TOOLS, SHOP AND GARAGE EQUIPMENT	2,067,358	2,052,863
396	POWER OPERATED EQUIPMENT AND TOOLS	2,822,852	2,822,852
397	COMMUNICATION EQUIPMENT	2,278,697	2,222,231
TOTAL GENERAL PLANT		**18,268,520**	**17,760,999**
TOTAL DEPRECIABLE GAS PLANT		**286,311,748**	**292,382,180**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

COMPARISON OF CALCULATED ACCRUED DEPRECIATION AND
BOOK DEPRECIATION AS OF SEPTEMBER 30, 2026

	DEPRECIABLE GROUP	CALCULATED ACCRUED DEPRECIATION	BOOK DEPRECIATION RESERVE
	(1)	(2)	(3)
DEPRECIABLE PLANT			
303	MISCELLANEOUS INTANGIBLE PLANT	22,595,671	22,593,631
PRODUCTION PLANT			
325.4	RIGHTS OF WAY	29,503	35,810
328	MEASURING AND REGULATING STATION STRUCTURES	8,935	9,773
329	OTHER STRUCTURES	1,451	1,403
332	FIELD LINES	200,655	171,978
334	MEASURING AND REGULATING STATION EQUIPMENT	1,478,789	1,733,727
TOTAL PRODUCTION PLANT		**1,719,333**	**1,952,691**
TRANSMISSION PLANT			
365.2	RIGHTS OF WAY	640,457	682,851
366.2	MEASURING AND REGULATING STATION STRUCTURES	124,114	118,684
366.3	OTHER STRUCTURES	3,018	3,593
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	18,568,420	20,383,572
367.2	MAINS - CATHODIC PROTECTION	2,191,985	2,294,098
369	MEASURING AND REGULATING STATION EQUIPMENT		
	1980 AND PRIOR	232,610	259,369
	1981 AND SUBSEQUENT	2,782,728	4,153,033
	TOTAL ACCOUNT 369	3,015,338	4,412,402
TOTAL TRANSMISSION PLANT		**24,543,332**	**27,895,200**
DISTRIBUTION PLANT			
374.2	RIGHTS OF WAY	3,205,473	3,338,953
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	5,384,804	6,224,278
375.4	STRUCTURES AND IMPROVEMENTS - SMALL	282,819	326,910
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	121,401,715	114,664,307
376.2	MAINS - CATHODIC PROTECTION	1,548,424	1,732,866
378	MEASURING AND REGULATING STATION EQUIPMENT	4,309,129	4,293,395
380	SERVICES	80,009,942	87,631,319
381	METERS	6,344,405	6,622,195
382	METER INSTALLATIONS	1,673,024	1,924,742
384	HOUSE REGULATOR INSTALLATIONS	484,676	604,497
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	6,430,251	7,424,326
TOTAL DISTRIBUTION PLANT		**231,074,662**	**234,787,788**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

COMPARISON OF CALCULATED ACCRUED DEPRECIATION AND
BOOK DEPRECIATION AS OF SEPTEMBER 30, 2026

	DEPRECIABLE GROUP	CALCULATED ACCRUED DEPRECIATION	BOOK DEPRECIATION RESERVE
	(1)	(2)	(3)
GENERAL PLANT			
390.11	OTHER SMALL STRUCTURES	103,161	98,290
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	122,563	138,489
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	191,598	210,181
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	3,703,512	3,553,490
392	TRANSPORTATION EQUIPMENT	7,508,111	7,508,111
394	TOOLS, SHOP AND GARAGE EQUIPMENT	2,359,617	2,350,040
396	POWER OPERATED EQUIPMENT AND TOOLS	2,967,643	2,967,643
397	COMMUNICATION EQUIPMENT	1,647,594	1,603,148
TOTAL GENERAL PLANT		**18,603,799**	**18,429,392**
TOTAL DEPRECIABLE GAS PLANT		**298,536,797**	**305,658,702**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

COMPARISON OF CALCULATED ACCRUED DEPRECIATION AND
BOOK DEPRECIATION RESERVE AS OF OCTOBER 31, 2027

	DEPRECIABLE GROUP	ORIGINAL COST AS OF OCTOBER 31, 2027	BOOK DEPRECIATION RESERVE
	(1)	(2)	(3)
DEPRECIABLE PLANT			
303	MISCELLANEOUS INTANGIBLE PLANT	23,009,585	22,980,541
PRODUCTION PLANT			
325.4	RIGHTS OF WAY	29,299	35,207
328	MEASURING AND REGULATING STATION STRUCTURES	8,841	9,624
329	OTHER STRUCTURES	1,499	1,425
332	FIELD LINES	203,589	174,997
334	MEASURING AND REGULATING STATION EQUIPMENT	1,548,041	1,776,611
TOTAL PRODUCTION PLANT		**1,791,269**	**1,997,864**
TRANSMISSION PLANT			
365.2	RIGHTS OF WAY	664,975	698,575
366.2	MEASURING AND REGULATING STATION STRUCTURES	126,389	121,248
366.3	OTHER STRUCTURES	3,033	3,565
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	19,512,951	20,884,359
367.2	MAINS - CATHODIC PROTECTION	2,316,028	2,404,973
369	MEASURING AND REGULATING STATION EQUIPMENT		
	1980 AND PRIOR	195,413	215,720
	1981 AND SUBSEQUENT	2,944,489	4,227,037
	TOTAL ACCOUNT 369	3,139,902	4,442,757
TOTAL TRANSMISSION PLANT		**25,763,278**	**28,555,477**
DISTRIBUTION PLANT			
374.2	RIGHTS OF WAY	3,379,134	3,404,730
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	5,824,920	6,615,862
375.4	STRUCTURES AND IMPROVEMENTS - SMALL	274,300	311,546
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	126,664,809	119,581,152
376.2	MAINS - CATHODIC PROTECTION	1,612,728	1,786,229
378	MEASURING AND REGULATING STATION EQUIPMENT	4,542,172	4,610,360
380	SERVICES	83,707,829	91,471,655
381	METERS	6,776,363	7,079,694
382	METER INSTALLATIONS	1,715,988	1,965,147
384	HOUSE REGULATOR INSTALLATIONS	502,524	620,091
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	6,741,631	7,654,318
TOTAL DISTRIBUTION PLANT		**241,742,398**	**245,100,784**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

COMPARISON OF CALCULATED ACCRUED DEPRECIATION AND
BOOK DEPRECIATION RESERVE AS OF OCTOBER 31, 2027

	DEPRECIABLE GROUP	ORIGINAL COST AS OF OCTOBER 31, 2027	BOOK DEPRECIATION RESERVE
	(1)	(2)	(3)
GENERAL PLANT			
390.11	OTHER SMALL STRUCTURES	151,897	156,669
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	137,473	150,489
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	199,582	212,829
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	5,241,720	5,059,293
392	TRANSPORTATION EQUIPMENT	8,517,958	8,517,958
394	TOOLS, SHOP AND GARAGE EQUIPMENT	2,761,401	2,723,391
396	POWER OPERATED EQUIPMENT AND TOOLS	3,400,852	3,400,852
397	COMMUNICATION EQUIPMENT	1,806,207	1,750,649
TOTAL GENERAL PLANT		**22,217,090**	**21,972,130**
TOTAL DEPRECIABLE GAS PLANT		**314,523,620**	**320,606,796**

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-K-Depreciation
Delivered on January 28, 2026

III-K.6

Request:

Provide a schedule by account and depreciable group showing the survivor curve and annual accrual rate estimated to be appropriate and changes in annual accrual rates by account or by depreciable group for all of the following:

III.K.6.a For the purposes of this current filing.
III.K.6.b For the purposes of the immediately preceding rate increase filing prior to the current proceeding.

Response:

a. Please refer to pages I-3 and I-4 in Exhibit No. C-Historic; pages VI-3 throughVI-7 in Exhibit No. C-Future; and pages I-3 and I-4 in Exhibit No. C-Fully Projected.

b. Please refer to the attached, Pages 2 through 7 for the most recent prior filing of all three test years.

Prepared by or under the supervision of: John J. Spanos

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF JUNE 30, 2022

	DEPRECIABLE GROUP	SURVIVOR CURVE	ORIGINAL COST AS OF JUNE 30, 2022	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	COMPOSITE REMAINING LIFE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)=(6)/(3)	(8)=(5)/(6)
DEPRECIABLE PLANT								
303	MISCELLANEOUS INTANGIBLE PLANT	10-SQ	24,528,069.49	14,190,632	10,337,438	2,179,823	8.89	4.7
PRODUCTION PLANT								
325.4	RIGHTS OF WAY	70-R4	53,446.39	35,060	18,387	475	0.89	38.7
328	MEASURING AND REGULATING STATION STRUCTURES	30-L2.5	10,095.84	9,874	221	27	0.27	8.2
329	OTHER STRUCTURES	40-SQ	2,650.00	1,165	1,485	68	2.57	21.8
332	FIELD LINES	50-R1.5	444,586.00	129,818	314,768	12,048	2.71	26.1
334	MEASURING AND REGULATING STATION EQUIPMENT	30-O1	2,998,094.84	1,553,293	1,444,802	89,920	3.00	16.1
TOTAL PRODUCTION PLANT			**3,508,873.07**	**1,729,209**	**1,779,663**	**102,538**	**2.92**	
TRANSMISSION PLANT								
365.2	RIGHTS OF WAY	80-R4	2,276,469.15	571,919	1,704,550	28,412	1.25	60.0
366.2	MEASURING AND REGULATING STATION STRUCTURES	60-R2	213,787.74	104,510	109,277	3,956	1.85	27.6
366.3	OTHER STRUCTURES	60-R2	3,811.68	3,629	183	7	0.18	26.1
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	68-R2	55,292,200.71	17,569,405	37,722,796	887,558	1.61	42.5
367.2	MAINS - CATHODIC PROTECTION	25-S2.5	3,157,236.11	1,908,632	1,248,604	112,368	3.56	11.1
369	MEASURING AND REGULATING STATION EQUIPMENT							
	1980 AND PRIOR	24-L1	298,205.78	298,206	0	0	-	-
	1981 AND SUBSEQUENT	35-R1.5	6,477,018.73	3,691,227	2,785,792	143,319	2.21	19.4
	TOTAL ACCOUNT 369		6,775,224.51	3,989,433	2,785,792	143,319	2.12	19.4
TOTAL TRANSMISSION PLANT			**67,718,729.90**	**24,147,528**	**43,571,202**	**1,175,620**	**1.74**	
DISTRIBUTION PLANT								
374.2	RIGHTS OF WAY	80-R4	12,160,607.84	2,712,836	9,447,772	154,850	1.27	61.0
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	VARIOUS *	9,789,473.48	5,232,945	4,556,527	265,088	2.71	17.2
375.4	STRUCTURES AND IMPROVEMENTS - SMALL	40-R0.5	806,342.09	400,294	406,048	19,063	2.36	21.3
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	69-L1.5	306,608,734.38	98,329,862	208,278,872	5,296,983	1.73	39.3
376.2	MAINS - CATHODIC PROTECTION	25-S2.5	2,444,141.54	1,442,862	1,001,280	79,447	3.25	12.6
378	MEASURING AND REGULATING STATION EQUIPMENT	38-R0.5	9,719,938.53	3,950,089	5,769,850	303,097	3.12	19.0
380	SERVICES	50-R0.5	198,013,930.40	76,789,662	121,224,268	4,435,290	2.24	27.3
381	METERS	36-R2	14,447,080.30	5,738,106	8,708,975	414,908	2.87	21.0
382	METER INSTALLATIONS	50-R0.5	3,311,694.08	1,858,516	1,453,178	55,934	1.69	26.0
384	HOUSE REGULATOR INSTALLATIONS	50-R0.5	1,103,156.90	557,642	545,515	20,265	1.84	26.9
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	50-R2	15,454,646.31	6,434,293	9,020,354	306,600	1.98	29.4
TOTAL DISTRIBUTION PLANT			**573,859,745.85**	**203,447,105**	**370,412,639**	**11,351,525**	**1.98**	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF JUNE 30, 2022

	DEPRECIABLE GROUP	SURVIVOR CURVE	ORIGINAL COST AS OF JUNE 30, 2022	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	COMPOSITE REMAINING LIFE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)=(6)/(3)	(8)=(5)/(6)
GENERAL PLANT								
390.11	OTHER SMALL STRUCTURES	40-R0.5	25,917.70	(29,435)	55,353	4,652	17.95	11.9
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	25-SQ	284,923.06	135,640	149,283	8,467	2.97	17.6
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	15-SQ	251,953.23	234,603	17,350	3,450	1.37	5.0
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	5-SQ	4,335,423.81	3,051,179	1,284,245	357,091	8.24	3.6
392	TRANSPORTATION EQUIPMENT		9,583,331.06	5,419,481	4,163,850	815,671	**	
394	TOOLS, SHOP AND GARAGE EQUIPMENT	25-SQ	5,358,834.66	2,075,018	3,283,816	183,574	3.43	17.9
396	POWER OPERATED EQUIPMENT AND TOOLS		5,022,450.43	2,755,822	2,266,628	368,941	**	
397	COMMUNICATION EQUIPMENT	10-SQ	3,238,081.58	1,588,436	1,649,645	306,041	9.45	5.4
TOTAL GENERAL PLANT			**28,100,915.53**	**15,230,744**	**12,870,170**	**2,047,887**	**7.29**	
TOTAL DEPRECIABLE GAS PLANT			**697,716,333.84**	**258,745,219**	**438,971,112**	**16,857,393**	**2.42**	
AMORTIZATION OF NET SALVAGE						1,725,389		
NONDEPRECIABLE PLANT								
	INTANGIBLE PLANT		123,845.54					
	PRODUCTION PLANT		2,840.80					
	TRANSMISSION PLANT		17,652.36					
	DISTRIBUTION PLANT		864,423.34	50,020				
	GENERAL PLANT		51,798.54	(16,289)				
TOTAL NONDEPRECIABLE PLANT			**1,060,560.58**	**33,732**				
TOTAL GAS PLANT			**698,776,894.42**	**258,778,950**	**438,971,112**	**18,582,782**		

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* LIFE SPAN PROCEDURE WAS USED. INTERIM SURVIVOR CURVES ARE 65-S0 AND 60-R0.5.
** ASSETS ARE INDIVIDUALLY DEPRECIATED.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF JUNE 30, 2023

	DEPRECIABLE GROUP	SURVIVOR CURVE	ORIGINAL COST AS OF JUNE 30, 2023	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	COMPOSITE REMAINING LIFE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)=(6)/(3)	(8)=(5)/(6)
DEPRECIABLE PLANT								
303	MISCELLANEOUS INTANGIBLE PLANT	10-SQ	24,528,069.49	16,371,177	8,156,892	2,147,844	8.76	3.8
PRODUCTION PLANT								
325.4	RIGHTS OF WAY	70-R4	53,446.39	35,536	17,910	474	0.89	37.8
328	MEASURING AND REGULATING STATION STRUCTURES	30-L2.5	10,095.84	9,901	195	25	0.25	7.8
329	OTHER STRUCTURES	40-SQ	2,650.00	1,233	1,417	67	2.53	21.1
332	FIELD LINES	50-R1.5	444,586.00	143,012	301,574	11,612	2.61	26.0
334	MEASURING AND REGULATING STATION EQUIPMENT	30-O1	3,140,592.87	1,642,959	1,497,634	95,420	3.04	15.7
TOTAL PRODUCTION PLANT			**3,651,371.10**	**1,832,641**	**1,818,730**	**107,598**	**2.95**	
TRANSMISSION PLANT								
365.2	RIGHTS OF WAY	80-R4	2,325,527.17	599,515	1,726,012	29,048	1.25	59.4
366.2	MEASURING AND REGULATING STATION STRUCTURES	60-R2	213,787.74	109,788	104,000	3,772	1.76	27.6
366.3	OTHER STRUCTURES	60-R2	3,811.68	3,636	176	7	0.18	25.1
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	68-R2	56,898,908.67	18,543,365	38,355,544	901,795	1.58	42.5
367.2	MAINS - CATHODIC PROTECTION	25-S2.5	3,335,759.10	2,020,943	1,314,816	111,713	3.35	11.8
369	MEASURING AND REGULATING STATION EQUIPMENT							
	1980 AND PRIOR	24-L1	298,205.78	298,206	0	0	-	-
	1981 AND SUBSEQUENT	35-R1.5	6,571,720.72	3,839,921	2,731,800	141,979	2.16	19.2
	TOTAL ACCOUNT 369		6,869,926.50	4,138,127	2,731,800	141,979	2.07	19.2
TOTAL TRANSMISSION PLANT			**69,647,720.86**	**25,415,374**	**44,232,348**	**1,188,314**	**1.71**	
DISTRIBUTION PLANT								
374.2	RIGHTS OF WAY	80-R4	12,999,341.83	2,767,747	10,231,595	167,859	1.29	61.0
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	VARIOUS *	10,273,158.48	5,102,778	5,170,381	307,031	2.99	16.8
375.4	STRUCTURES AND IMPROVEMENTS - SMALL	40-R0.5	806,342.09	397,517	408,825	19,361	2.40	21.1
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	69-L1.5	321,310,928.48	102,299,724	219,011,204	5,558,323	1.73	39.4
376.2	MAINS - CATHODIC PROTECTION	25-S2.5	2,745,527.53	1,500,097	1,245,431	91,887	3.35	13.6
378	MEASURING AND REGULATING STATION EQUIPMENT	38-R0.5	10,880,187.46	4,156,030	6,724,157	360,015	3.31	18.7
380	SERVICES	50-R0.5	207,007,958.40	80,738,135	126,269,823	4,700,897	2.27	26.9
381	METERS	36-R2	15,727,548.29	6,046,846	9,680,702	458,774	2.92	21.1
382	METER INSTALLATIONS	50-R0.5	3,311,694.08	1,914,484	1,397,210	53,589	1.62	26.1
384	HOUSE REGULATOR INSTALLATIONS	50-R0.5	1,103,156.90	577,939	525,218	19,220	1.74	27.3
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	50-R2	16,019,395.36	6,706,275	9,313,120	318,588	1.99	29.2
TOTAL DISTRIBUTION PLANT			**602,185,238.90**	**212,207,572**	**389,977,666**	**12,055,544**	**2.00**	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF JUNE 30, 2023

	DEPRECIABLE GROUP	SURVIVOR CURVE	ORIGINAL COST AS OF JUNE 30, 2023	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	COMPOSITE REMAINING LIFE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)=(6)/(3)	(8)=(5)/(6)
GENERAL PLANT								
390.11	OTHER SMALL STRUCTURES	40-R0.5	25,917.70	(29,571)	55,489	4,933	19.03	11.2
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	25-SQ	312,976.06	144,519	168,457	9,584	3.06	17.6
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	15-SQ	244,188.97	223,225	20,964	3,751	1.54	5.6
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	5-SQ	6,953,183.92	2,662,453	4,290,731	1,099,841	15.82	3.9
392	TRANSPORTATION EQUIPMENT		11,243,498.06	5,207,697	6,035,801	1,188,041	**	
394	TOOLS, SHOP AND GARAGE EQUIPMENT	25-SQ	5,783,361.79	1,868,514	3,914,848	210,313	3.64	18.6
396	POWER OPERATED EQUIPMENT AND TOOLS		5,576,187.43	2,821,778	2,754,409	532,860	**	
397	COMMUNICATION EQUIPMENT	10-SQ	3,632,117.15	1,867,985	1,764,132	331,234	9.12	5.3
TOTAL GENERAL PLANT			**33,771,431.08**	**14,766,600**	**19,004,831**	**3,380,556**	**10.01**	
TOTAL DEPRECIABLE GAS PLANT			**733,783,831.43**	**270,593,364**	**463,190,467**	**18,879,856**	**2.57**	
AMORTIZATION OF NET SALVAGE						1,715,534		
NONDEPRECIABLE PLANT								
	INTANGIBLE PLANT		123,845.54					
	PRODUCTION PLANT		2,840.80					
	TRANSMISSION PLANT		17,652.36					
	DISTRIBUTION PLANT		864,541.86	49,771				
	GENERAL PLANT		51,798.54	(16,289)				
TOTAL NONDEPRECIABLE PLANT			**1,060,679.10**	**33,482**				
TOTAL GAS PLANT			**734,844,510.53**	**270,626,846**	**463,190,467**	**20,595,390**		

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* LIFE SPAN PROCEDURE WAS USED. INTERIM SURVIVOR CURVES ARE 65-S0 AND 60-R0.5.
** ASSETS ARE INDIVIDUALLY DEPRECIATED.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF JULY 31, 2024

	DEPRECIABLE GROUP	SURVIVOR CURVE	ORIGINAL COST AS OF JULY 31, 2024	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	COMPOSITE REMAINING LIFE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)=(6)/(3)	(8)=(5)/(6)
DEPRECIABLE PLANT								
303	MISCELLANEOUS INTANGIBLE PLANT	10-SQ	24,528,069.49	18,698,819	5,829,250	2,131,019	8.69	2.7
PRODUCTION PLANT								
325.4	RIGHTS OF WAY	70-R4	53,446.39	36,051	17,395	472	0.88	36.9
328	MEASURING AND REGULATING STATION STRUCTURES	30-L2.5	10,095.84	9,928	168	22	0.22	7.6
329	OTHER STRUCTURES	40-SQ	2,650.00	1,306	1,344	67	2.53	20.1
332	FIELD LINES	50-R1.5	444,586.00	156,625	287,961	11,181	2.51	25.8
334	MEASURING AND REGULATING STATION EQUIPMENT	30-O1	3,296,697.86	1,743,419	1,553,279	99,947	3.03	15.5
TOTAL PRODUCTION PLANT			**3,807,476.09**	**1,947,329**	**1,860,147**	**111,689**	**2.93**	
TRANSMISSION PLANT								
365.2	RIGHTS OF WAY	80-R4	2,446,876.18	628,965	1,817,911	30,685	1.25	59.2
366.2	MEASURING AND REGULATING STATION STRUCTURES	60-R2	213,787.74	114,023	99,765	3,651	1.71	27.3
366.3	OTHER STRUCTURES	60-R2	3,811.68	3,643	169	7	0.18	24.1
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	68-R2	60,594,178.66	19,511,841	41,082,338	967,040	1.60	42.5
367.2	MAINS - CATHODIC PROTECTION	25-S2.5	3,746,344.12	2,139,647	1,606,697	121,905	3.25	13.2
369	MEASURING AND REGULATING STATION EQUIPMENT							
	1980 AND PRIOR	24-L1	298,205.78	294,580	3,626	649	0.22	5.6
	1981 AND SUBSEQUENT	35-R1.5	6,789,525.74	3,999,555	2,789,971	146,032	2.15	19.1
	TOTAL ACCOUNT 369		7,087,731.52	4,294,135	2,793,597	146,681	2.07	19.0
TOTAL TRANSMISSION PLANT			**74,092,729.90**	**26,692,254**	**47,400,477**	**1,269,969**	**1.71**	
DISTRIBUTION PLANT								
374.2	RIGHTS OF WAY	80-R4	14,029,952.87	2,840,032	11,189,921	183,599	1.31	60.9
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	VARIOUS *	10,832,987.48	4,981,220	5,851,769	388,159	3.58	15.1
375.4	STRUCTURES AND IMPROVEMENTS - SMALL	40-R0.5	806,342.09	394,371	411,971	20,197	2.50	20.4
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	69-L1.5	339,457,244.45	106,937,576	232,519,668	5,879,118	1.73	39.6
376.2	MAINS - CATHODIC PROTECTION	25-S2.5	3,115,860.55	1,573,569	1,542,292	106,609	3.42	14.5
378	MEASURING AND REGULATING STATION EQUIPMENT	38-R0.5	12,305,866.45	4,458,513	7,847,353	420,154	3.41	18.7
380	SERVICES	50-R0.5	218,059,544.42	85,245,267	132,814,277	5,007,785	2.30	26.5
381	METERS	36-R2	17,300,948.27	6,419,888	10,881,060	511,472	2.96	21.3
382	METER INSTALLATIONS	50-R0.5	3,311,694.08	1,972,602	1,339,092	51,495	1.55	26.0
384	HOUSE REGULATOR INSTALLATIONS	50-R0.5	1,103,156.90	598,733	504,424	18,346	1.66	27.5
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	50-R2	16,713,339.35	7,010,275	9,703,064	333,291	1.99	29.1
TOTAL DISTRIBUTION PLANT			**637,036,936.91**	**222,432,046**	**414,604,891**	**12,920,225**	**2.03**	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF JULY 31, 2024

	DEPRECIABLE GROUP	SURVIVOR CURVE	ORIGINAL COST AS OF JULY 31, 2024	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	COMPOSITE REMAINING LIFE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)=(6)/(3)	(8)=(5)/(6)
GENERAL PLANT								
390.11	OTHER SMALL STRUCTURES	40-R0.5	25,917.70	(14,052)	39,970	3,691	14.24	10.8
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	25-SQ	321,096.71	131,140	189,957	10,895	3.39	17.4
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	15-SQ	247,970.22	223,168	24,802	3,946	1.59	6.3
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	5-SQ	10,375,161.10	3,528,902	6,846,259	1,788,842	17.24	3.8
392	TRANSPORTATION EQUIPMENT		13,151,262.06	4,956,855	8,194,407	1,289,099	**	
394	TOOLS, SHOP AND GARAGE EQUIPMENT	25-SQ	6,363,841.88	1,752,516	4,611,326	244,153	3.84	18.9
396	POWER OPERATED EQUIPMENT AND TOOLS		6,212,509.43	2,885,531	3,326,978	577,392	**	
397	COMMUNICATION EQUIPMENT	10-SQ	3,964,182.42	2,068,214	1,895,968	360,120	9.08	5.3
TOTAL GENERAL PLANT			**40,661,941.52**	**15,532,274**	**25,129,667**	**4,278,138**	**10.52**	
TOTAL DEPRECIABLE GAS PLANT			**780,127,153.91**	**285,302,722**	**494,824,432**	**20,711,040**	**2.65**	
AMORTIZATION OF NET SALVAGE						1,701,138		
NONDEPRECIABLE PLANT								
	INTANGIBLE PLANT		123,845.54					
	PRODUCTION PLANT		2,840.80					
	TRANSMISSION PLANT		17,652.36					
	DISTRIBUTION PLANT		864,541.86	49,587				
	GENERAL PLANT		51,798.54	(16,289)				
TOTAL NONDEPRECIABLE PLANT			**1,060,679.10**	**33,298**				
TOTAL GAS PLANT			**781,187,833.01**	**285,336,020**	**494,824,432**	**22,412,178**		

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* LIFE SPAN PROCEDURE WAS USED. INTERIM SURVIVOR CURVES ARE 65-S0 AND 60-R0.5.
** ASSETS ARE INDIVIDUALLY DEPRECIATED.

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-K-Depreciation
Delivered on January 28, 2026

III-K.7

Request:

Provide a comprehensive statement of any changes made in method of depreciation and in the selection of average service lives

Response:

Please see the response to III.K.1 and III.K.6

Prepared by or under the supervision of: John J. Spanos

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-K-Depreciation
Delivered on January 28, 2026

III-K.8

Request:

Provide a table showing the cumulative depreciated original cost by year of installation for public utility plant by USOA in service at the end of the HTY, the FTY and the FPFTY (depreciable plant only) as claimed in the measures of value. Formulate the table with all of the following:

III.K.8.a Column 1: Year installed.
III.K.8.b Column 2: Original cost.
III.K.8.c Column 3: Accrued depreciation.
III.K.8.d Column 4: Depreciated original cost (which is original cost minus accrued depreciation); total this column.
III.K.8.e Column 5: Cumulative depreciated original cost, increased year by year.
III.K.8.f Column 6: Cumulative depreciated original cost, year by year, divided by the total of column 4, shown as a percent.

Response:

Please reference pages II-3 through II-5 of National Fuel's Historic Test Year depreciation study included in Exhibit No. C-Historic.

Please refer to pages VII-3 through VII-5 of National Fuel's Future Test Year depreciation study included in Exhibit No. C-Future.

Please refer to pages II-3 through II-5 of National Fuel's Fully Projected Future Test Year depreciation study included in Exhibit No. C-Fully Projected.

Prepared by or under the supervision of: John J. Spanos

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-K-Depreciation
Delivered on January 28, 2026

III-K.9

Request:

Provide an exhibit showing, by account, the gross salvage, cost of removal, and net salvage for the HTY and the 4 years immediately preceding the HTY.

Response:

Please refer to pages III-2 and III-3 of National Fuel's Historic Test Year depreciation study included in Exhibit No. C-Historic.

Please refer to pages VIII-2 and VIII-3 of National Fuel's Future Test Year depreciation study included in Exhibit No. C-Future.

Please refer to pages III-2 and III-3 of National Fuel's Fully Projected Future Test Year depreciation study included in Exhibit No. C-Fully Projected.

Prepared by or under the supervision of: John J. Spanos

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-L-Taxes
Delivered on January 28, 2026

III-L.1

Request:

Provide a copy of the Federal Tax Returns and State Tax Returns and amended returns, including supporting schedules, for the most recent 3 tax years for the public utility.

Response:

Please refer to Exhibit SDR-RR-55 for the CONFIDENTIAL Federal Tax Return excerpts for the most recent three tax years.

Please refer to Exhibit III.L.3 for the State Tax Returns filed for the most recent three tax years.

Prepared by or under the supervision of: Erica Forcucci

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-L-Taxes
Delivered on January 28, 2026

III-L.2

Request:

Provide a schedule of Federal and Pennsylvania taxes, other than income taxes, calculated on the basis of test year per book, pro forma at present rates, and pro forma at proposed rates, to include all of the following categories:

III.L.2.a Social Security.
III.L.2.b Unemployment.
III.L.2.c Public Utility Realty.
III.L.2.d Commission assessment.
III.L.2.e Other property.
III.L.2.f PENNSYLVANIA SALES and use tax.
III.L.2.g Other taxes.

Response:

Refer to National Fuel Exhibit A, Schedules D-9 and D-10 for the Historic, Future, and Fully Projected Future test years.

Prepared by or under the supervision of: Donald N. Koch

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III-L.3

Request:

Provide the three most recently filed Pennsylvania Corporate Tax reports and any associated Pennsylvania Corporate Tax Determinations.

Response:

Please refer to CONFIDENTIAL Attachment III.L.3. The Company is providing CONFIDENTIAL Attachment III.L.3 in a separately sealed envelope that is marked "CONFIDENTIAL". The Company hereby requests that the content of such envelope be placed in the Commission's NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such CONFIDENTIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.

Prepared by or under the supervision of: Erica Forcucci

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III-L.4

Request:

Submit a schedule showing the Gross Receipts Tax base used in computing Pennsylvania Gross Receipts Tax adjustment if applicable.

Response:
The Company is not subject to Gross Receipts Tax in Pennsylvania, therefore, no schedule has been prepared or provided.

Prepared by or under the supervision of: Erica Forcucci

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III-L.5

Request:

Submit details of calculations for taxes, other than income, where a public utility is assessed taxes for doing business in another state or on its property located in another state.

Response:

Please see Attachment III.L.5 for taxes, other than income, for doing business in another state or on its property located in another state.

Prepared by or under the supervision of: Erica Forcucci

National Fuel Gas Distribtuion Corporation
III.L5 Attachment Taxes Other than Income
Twelve Months Ending September 30, 2025

NYS Gross Receipts Tax	9,872,245
New York Property Tax	23,250,926
NYS Sales Tax	20,350
NYS Insurance Premium Tax	40,103
NYS Capital Tax	211,044
NYS Income Tax	1,184,715
Total	34,579,383

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III-L.6

Request:

State amount of the debt interest used for income tax calculations and details of debt interest computations for each of the following:

III.L.6.a Actual HTY.
III.L.6.b Annualized HTY year-end.
III.L.6.c Claimed FTY year-end, using present rates and proposed rates.
III.L.6.d Claimed FPFTY year-end, using present rates and proposed rates.

Response:

a. The actual amount for the twelve months ended September 30, 2025 is $12.1 million.

b. The annualized amount for the twelve months ended September 30, 2025 is $10.9 million.

c. The claimed amount at present rates for the twelve months ended September 30, 2026 is $12.2 million.

   The claimed amount at proposed rates for the twelve months ended September 30, 2026 is $11.5 million.

d. The claimed amount at present rates for the twelve months ended October 31, 2027 is $13.6 million.

   The claimed amount at proposed rates for the twelve months ended October 31, 2027 is $13.9 million.

Prepared by or under the supervision of: Donald N. Koch

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III-L.7

Request:

State amount of debt interest used for income tax calculations which has been allocated from the debt interest of an affiliate, and details of the allocation, for each of the following:

III.L.7.a Actual HTY.
III.L.7.b Annualized HTY year-end.
III.L.7.c Claimed FTY year-end, using present rates and proposed rates.
III.L.7.d Claimed FPFTY year-end, using present rates and proposed rates.

Response:

The amount of debt interest used for the income tax calculation is not allocated from an affiliate. Instead, interest is "synchronized" by application of the embedded debt cost rate used to determine the fair rate of return to the rate base of National Fuel.

Prepared by or under the supervision of: Donald N. Koch

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III-L.8

Request:

PROVIDE THE CALCULATION OF THE DIFFERENTIAL, IF ANY, THAT ACCRUES TO THE PUBLIC UTILITY TO DETERMINE COMPLIANCE WITH 66 PA.C.S. § 1301.1 FOR RATE FILINGS PROPOSING BASE RATES TO BECOME EFFECTIVE PRIOR TO JANUARY 1, 2026.

Response:

Not applicable. The Company does not have a rate filing proposing base rates to become effective prior to January 1, 2026. Accordingly, no differential calculation is required under 66 PA. C.S. § 1301.1.

Prepared by or under the supervision of: Erica Forcucci

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III-L.9

Request:

Provide a schedule showing for the last 3 years' income tax refunds, plus interest, net of taxes, received from the Federal government due to prior year claims.

Response:

There have been no forms filed for the last three years to claim federal refunds on behalf of the Company.

Prepared by or under the supervision of: Erica Forcucci

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III-L.10

Request:

To account for the difference between tax depreciation and ratemaking depreciation include all of the following:

III.L.10.a Provide detailed computations showing the deferred income taxes derived by using accelerated tax depreciation applicable to post-1969 public utility property for both increasing and non-increasing productive capacity, and accelerated depreciation rates (ADR) on property, separating between Federal and State and rate used. Justify if based on the HTY.

III.L.10.b State whether tax depreciation is based on all rate base items claimed as of the end of the FTY, and whether it is the annual tax depreciation at the end of the FTY.

III.L.10.c Reconcile any difference between the deferred tax balance as shown as a reduction to measures of value (rate base) and the deferred tax balance as shown on the balance sheet.

III.L.10.d Make appropriate adjustment and projections for the FPFTY.

Response:

a. Please refer to Schedules D-11 in Exhibit A (Historic), Exhibit A (Future), and Exhibit A (Fully Projected) for the computation of federal and state deferred income taxes.

b. There is no difference between tax depreciation and ratemaking depreciation. Tax depreciation is based on all rate base items claimed as of the end of the FTY. The tax depreciation presented reflects the annual tax depreciation applicable at the end of the FTY.

c. The accumulated deferred income tax balance ("ADIT") as shown on the balance sheet represents the net tax effects of the timing differences between book depreciation and tax depreciation of plant assets that are placed in service. The tax basis of the plant assets is based on book basis, adjusted by tax repairs, Contributions in Aid of Construction ("CIAC") and Uniform Capitalization Rules under IRC § 263A ("UNICAP"). The ADIT also includes Average Rate of Assumption Method ("ARAM") amortization related to the excess ADIT from the Tax Cuts and Jobs Act ("TCJA ").

The ADIT balance used as a reduction to rate base includes projected plant activities for the FPFTY. Also, the ADIT balance is prorated according to the normalization rules under Treasury Regulation 1.167(l)-1(h)(6)(ii).

d. Please refer to Schedules D-11 in Exhibit A (Historic), Exhibit A (Future) and Exhibit A (Fully Projected) for the projections for the FPFTY.

Prepared by or under the supervision of: Erica Forcucci

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III-L.11

Request:

Provide a schedule showing a breakdown of the deferred income taxes by Federal and State per book, pro forma, present rates and under proposed rates.

Response:

Please refer to Exhibit EF-1 in Exhibit A (Historic), Exhibit A (Future), and Exhibit A (Fully Projected) for the breakdown of accumulated deferred income tax ("ADIT") by federal and state.

Prepared by or under the supervision of: Erica Forcucci

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III-L.12

Request:

Regarding the Tax Cuts and Jobs Act of 2017 (TCJA) (Pub.L. No. 115-97) which became effective January 1, 2018, provide all of the following:

III.L.12.a Explanation of the method used to return excess accumulated deferred income tax (ADIT) to ratepayers as a result of the TCJA and the resulting reduced Federal income tax rate.

III.L.12.b Verification that the remaining excess ADIT balance is being subtracted from rate base in the FPFTY claim.

III.L.12.c Breakdown between ADIT and excess ADIT (broken down by protected and unprotected) and explain how many years remain on the amortization.

III.L.12.d Amount of excess ADIT being flowed back to ratepayers in the HTY, the FTY and the FPFTY, indicating where this is accomplished in the base rate case filing schedules.

Response:

a. The protected excess ADIT is being amortized under the tax normalization requirements per IRC Section 168(i)(9). The amortization is calculated using the Average Rate of Assumption Method ('ARAM"). The Company utilizes the PowerTax software to calculate ARAM and maintain the ADIT balance. The deficient unprotected ADIT balance is amortized over a ten-year period from 2018 through 2027 on a straight-line basis. The result is annual amortization of approximately $1.0 million. The treatment of protected excess ADIT and deficient unprotected ADIT balances were previously documented and explained in Dockets M-2018-2641242 and R-2018-3000527. This was also discussed in the tax testimony of Case-R-2022-3035730.

b. The remaining unamortized excess ADIT balance is included in the total ADIT balance, and is subtracted from the rate base in the FPFTY claim. It will continue to reduce the rate base until it is fully returned to ratepayers.

c. The total ADIT balance in HTY is $(76,126,283), which included $(22,887,501) remaining excess protected ADIT and $(53,238,782) of ADIT. The remaining deficient unprotected ADIT balance of $2,063,866 is not included in the total ADIT balance that is included in the rate base.

d. Please refer to Exhibit EF-1 in Exhibit A (Historic), Exhibit A (Future), and Exhibit A (Fully Projected) for the amortization of excess protected ADIT being flowed back to ratepayers.

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III-L.13

Request:

Submit a schedule showing a breakdown of accumulated investment tax credits (3%, 4%, 7%, 10% and 11%), together with details of methods used to write-off the unamortized balances.

Response:

NFGDC no longer has any accumulated investment tax credits.

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III-L.14

Request:

Submit a schedule showing the adjustments for taxable net income per book, including below-the-line items, and pro forma under present rates, together with an explanation of any difference between the adjustments. Indicate charitable donations and contributions in the tax calculation for ratemaking purposes.

Response:

Please refer to Schedule D-11 in Exhibit A (Historic), Exhibit A (Future), and Exhibit A (Fully Projected) for the adjustments for taxable net income per book.

Charitable donations and contributions are not included for ratemaking purposes.

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III-L.15

Request:

Submit detailed calculations supporting taxable net income before Federal and State income taxes where the income tax is subject to allocation due to the operations in another state, or due to operation of other taxable utilities or non-public utility businesses, or by operating divisions or areas.

Response:

NFGDC files as part of a New York combined tax return with its Parent, and it includes the other subsidiaries of the Parent. NFGDC files a separate tax return in the state of Pennsylvania. Taxable income is allocated to Pennsylvania based on cubic foot capacity.

Please see Attachment III.L.15.

Prepared by or under the supervision of: Erica Forcucci

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
TAXABLE INCOME PER BOOKS

	Twelve Months Ending 9/30/25		
	TOTAL DIST	NFGD NY	NFGD PA
BOOK INCOME	83,249,364	53,010,606	30,238,758
FEDERAL INCOME TAX	13,916,994	10,830,367	3,086,627
STATE INCOME TAX	1,736,318	2,003,407	(267,089)
PRE TAX NET BOOK INCOME	98,902,676	65,844,380	33,058,296
TOTAL PERM DIFFS	(19,711,968)	1,690,552	(21,402,520)
TOTAL TEMP DIFFS	(180,043,325)	(154,489,277)	(25,554,048)
TAXABLE INCOME BEFORE STATE TAX DEDUCTION	**(100,852,618)**	**(86,954,346)**	**(13,898,272)**

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III-L.16

Request:

State the public utility's policy and practice on capitalization of repairs maintenance. If the public utility has opted out of Treasury Regulations 26 CFR 1.162—1.263, submit a depreciation/amortization schedule to reflect depreciation as taken over the useful life of the asset(s).

Response:

The Company treats certain expenditures that are capitalized for book purposes as deductible for tax repair purposes. The Company has not opted out of Treasury Regulations 26 CFR 1.162-1.263. For linear property, the Company follows the guidance detailed in Revenue Procedure 2023-15. For non-linear property, the Company deducts the costs of repairs incurred in connection with the repair and maintenance of their network assets pursuant to Internal Revenue Code Section 162.

In 2009, the Company filed an application for change in method of accounting with the IRS National Office to change its accounting method to treat certain expenditures that were capitalized for book purposes as deductible repairs for tax purposes. The IRS National Office approved the request, subject to review by local IRS examiners. This application was for both linear and non-linear property. As discussed in Case R-2022-3035730 Statement No. 12, the IRS neither accepted nor rejected the position taken in the tax returns related to the proper method of accounting for expenditures related to natural gas transmission and distribution property due to lack of guidance at the time. On April 14, 2023, the IRS released Revenue Procedure 2023-15, providing a "natural gas transmission and distribution property safe harbor method of accounting" ("NGSH Method") that taxpayers may use to determine whether expenses to repair, maintain, replace, or improve natural gas transmission and distribution property must be capitalized or be allowable as deductions for repairs. The revenue procedure is effective for taxable years ending after May 1, 2023. Adopting the NGSH Method requires a change in accounting method, and the new guidance provides detailed implementation procedures.

For the Company's fiscal year 2023 tax return, an application for change in method of accounting was filed to adopt Revenue Procedure 2023-15 for linear property only. The fiscal year 2023 application for change in accounting method and corresponding section 481(a) adjustment were reviewed and accepted by the IRS. In conformity with the Revenue Procedure 2023-15, the Company notified the Pennsylvania Public Utility Commission in August 2024 of the change in the method of accounting and provided the related IRS Form 3115 at that time. The Company has since followed Revenue Procedure 2023-15 in determining linear property tax repairs.

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III-L.17

Request:

Submit detailed calculations OF THE AMORTIZATION OF ANY ADJUSTMENT MADE BY THE PUBLIC UTILITY UNDER INTERNAL REVENUE CODE SECTION 481(a) DUE TO A CHANGE IN ACCOUNTING METHOD TO REFLECT EXPENDITURES THAT ARE CAPITALIZED PER BOOKS AND TREATED AS DEDUCTIBLE REPAIR EXPENSES FOR FEDERAL INCOME TAX PURPOSES. Submit schedules for each accounting area if the public utility has more than one accounting area.

Response:

The Company made two Internal Revenue Code Section 481(a) adjustments for expenditures that are capitalized per books and treated as deductible repair expenses for federal income tax purposes. The first Section 481(a) adjustment was made for fiscal year 2009. The second Section 481(a) adjustment was made for fiscal year 2023. Amortization was not taken for either Section 481(a) adjustments. Both Section 481(a) adjustments made by the Company were negative and limited to an adjustment period of one year per the Internal Revenue Service Instructions for Form 3115, line 25.

Prepared by or under the supervision of: Erica Forcucci

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III-L.18

Request:

Furnish a breakdown of major items comprising DEFERRED TAX ASSETS and deferred income tax charges and other deferred income tax credits, reserves and associated reversals on liberalized depreciation.

Response:
Please refer to Schedule C-6 in Exhibit A (Historic), Exhibit A (Future), and Exhibit A (Fully Projected) for the accumulated deferred income tax ("ADIT") balance associated with liberalized depreciation. The HTY ADIT balance is $(76,126,283), which included tax depreciation, Contributions in Aid of Construction ("CIAC"), Uniform Capitalization ("UNICAP") and amortization of excess deferred tax from the Tax Cut and Job Act of 2017.

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III-L.19

Request:

Submit all of the following data applicable to Pennsylvania Corporate Income Tax deferment:

III.L.19.a Amounts of straight-line depreciation and accelerated tax depreciation, indicating the difference between these categories, and explaining which category gave rise to the normalizing tax charged back to the HTY operating statement.
III.L.19.b Normalization for both Federal and State income taxes.
III.L.19.c Tax rates used to calculate tax deferment amount.

Response:

a. & b.
Please refer to Schedule D-12 in Exhibit A (Historic), which provide details of the deferred income taxes from normalized depreciation separately for Federal and State.

c. The U.S gross federal income tax rate is 21%, but net of the federal benefit for state taxes the rate used to calculate the deferment amount becomes 19.217%. The state tax rate is 8.49%.

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III-L.20

Request:

State whether all tax effects due to accelerated depreciation on property installed prior to 1970 have been flowed through to income. If not, explain why not.

Response:

The Company does not defer taxes on tax depreciation related to property installed prior to 1970.

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III-L.21

Request:

Explain whether the public utility MADE AN ACCOUNTING METHOD CHANGE TO TREAT CERTAIN EXPENDITURES THAT ARE CAPITALIZED PER BOOKS AS DEDUCTIBLE REPAIR EXPENSES AND, IF SO, THE FIRST TAXABLE YEAR TO WHICH SUCH CHANGE APPLIED. IDENTIFY THE AMOUNTS OF PER BOOK CAPITAL EXPENDITURES THAT ARE BEING DEDUCTED AS REPAIR EXPENSES IN CALCULATING TAX EXPENSE INCLUDED IN REVENUE REQUIREMENT FOR THE HTY AND, AS APPLICABLE, THE FTY AND THE FPFTY.

Response:

The Company has made two accounting method changes to treat certain expenditures that are capitalized per books as deductible repair expenses. The first accounting method change was made for fiscal year 2009. The second accounting method change was made for fiscal year 2023 to adopt Revenue Procedure 2023-15. See III.L.16 for more information.

The amounts of per book capital expenditures that are being deducted as repair expenses are as follows:

- HTY: $27,430,000
- FTY: $34,340,000
- FPFTY: $37,685,000

Prepared by or under the supervision of: Erica Forcucci

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III-L.22

Request:

Show any income tax loss/gain carryovers from previous years that may affect the HTY income taxes, the FTY income taxes or the FPFTY Income Taxes. Show loss or gain carryovers by years of origin and amounts remaining by years at the end of the HTY.

Response:

The Company does not have any income tax loss/gain carryovers from previous years that may affect test year income taxes or future year income taxes.

For ratemaking purposes, income tax expense is calculated using the standalone methodology required by the PAPUC. Under this approach, the Company's taxable income excludes certain book to tax differences (Schedule M adjustments). Although the Company's separate Pennsylvania tax return reflects a net operating loss (NOL) due to Schedule M adjustments, the ratemaking calculation results in taxable income for the Historic Test Year (HTY), Future Test Year (FTY), and Fully Projected Future Test Year (FPFTY). While the Company's actual tax filings may include NOL carryforwards, these do not impact the ratemaking calculation.

Accordingly, there are no NOL carryovers applicable to the ratemaking income tax computation for HTY, FTY, or FPFTY. No loss or gain carryovers by year of origin or remaining amounts exist at the end of the HTY for ratemaking purposes.

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III-L.23

Request:

STATE WHETHER THE INTEREST COMPONENT OF AFUDC IS CALCULATED ON A PRE-TAX BASIS (I.E., WITHOUT REFLECTING TAX SAVINGS FOR INTEREST DEDUCTIBILITY) OR ON AN AFTER-TAX BASIS (I.E., BY REDUCING THE AFUDC INTEREST RATE TO REFLECT THE TAX SAVINGS FOR INTEREST DEDUCTIBILITY). IF THE FORMER, STATE HOW THE TAX SAVING IS RECOGNIZED, IF AT ALL, IN ESTABLISHING THE BASE-RATE REVENUE REQUIREMENT IN THE FOLLOWING:

III.L.23.a Amount of construction claimed in this tax savings reduction. Explain the basis for this amount.
III.L.23.b MANNER in which the debt portion of this construction is determined for purposes of the deferral calculations.
III.L.23.c Interest rate used to calculate interest on this construction debt portion and the manner in which it is derived.
III.L.23.d Details of calculation to determine tax savings reduction. State whether state taxes are increased to reflect the construction interest elimination.

Response:

The interest component of AFUDC is calculated on a pre-tax basis by NFGDC.

a. The amount of construction claimed is $56,242,685. This is calculated by determining the 13-month average balance of: Construction Work in Process (CWIP), less Construction Completed Not Capitalized (CCNC) less any quarterly accruals recorded in the General Ledger (these are not made on a project level and AFUDC is applied at the project level, thus accruals are not reflected at the project level). However, since the calculated short-term debt balance is higher than the calculated construction balance for the year, the construction balance is set to equal the short-term debt balance and the assumption is that the construction would be totally funded by short-term debt.

b. The manner in which the debt portion of this construction is determined for purposes of the deferral calculations is:
   – Not Applicable. There are no tax deferrals as a result of this calculation because there is no book to tax difference.

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c. The interest rate used to calculate interest on the construction debt portion and the manner in which it is derived is:
   – (Calculated short-term interest rate multiplied by average short-term debt/average CWIP balance, plus the calculated weighted average long-term interest rate) * (Prior year long-term debt ending balance divided by (prior year end long-term debt balance, plus prior year end preferred stock balance, plus prior year end common equity before accumulated other comprehensive income), all multiplied by (1 minus average short-term debt balance / 13 month average CWIP balance).

d. State whether state taxes are increased to reflect the construction interest elimination.
   – Not applicable. There are no construction interest eliminations.

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III-L.24

Request:

Provide a detailed analysis of taxes accrued per books as of year-end for the HTY and as anticipated for the FTY and the FPFTY. Provide the basis for the accrual and the amount of taxes accrued monthly.

Response:

Please refer to response III.L.5 for a schedule of taxes accrued as of year-end for the HTY. For FTY and FPFTY, please refer to Schedules D-9 and D-10 in Exhibit A (Future), and Exhibit A (Fully Projected) for taxes other than income and income taxes, respectively.

Prepared by or under the supervision of: Erica Forcucci

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

ACCRUED TAXES AND BASIS FOR ACCRUALS
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

Taxes Accrued	Pennsylvania Rate Jurisdiction	Basis for Accrual of Tax	Amount of Tax Accrued Monthly
Taxes Other than Income			
Federal Insurance Contribution Act	1,952,468	FICA includes a 6.2% Social Security tax and 1.45% Medicare tax on gross earnings. The earnings base subject to tax is adjusted annually. Taxes are accrued at a rate of 7.65% of these wages. The monthly accrual is based on payroll data for the period.	Accrual is computed monthly by applying the tax rate to taxable earnings.
Federal Unemployment Compensation	10,732	Tax is based on the first $7,000 of wages paid to an employee. The monthly accrual is based on payroll data for the period.	Accrual is computed monthly by applying the tax rate to taxable earnings.
State Unemployment Compensation	98,722	State Unemployment taxes are based on rates set by the state and applied to gross earnings. The earnings base subject to tax is adjusted annually by the state. Taxes are accrued at various rates depending upon experience. The monthly accrual is based on payroll data for the period.	Accrual is computed monthly by applying the tax rate to taxable earnings.
Utility Realty Tax	112,501	Tax is based on the market value of public utility land, building, and other structures. The monthly accrual is based on an estimate of the final tax liability that the Company will incur	Monthly accrual is one twelfth of total estimated tax.
Property Tax	83,601	Tax is based on the assessed valuation of property owned by the Company in various municipalities where the Company operates. The tax rate varies with each locale.	Monthly accrual is one twelfth of total estimated tax.
Income Taxes			
Federal Income Tax	2,902,138	Tax is based on the taxable net income as defined and reported to the Internal Revenue Service. The tax rate is 21% of taxable income. The monthly accrual is based on the taxable income achieved from our level of operations for that month.	Accrual is computed monthly by applying the rate to taxable income for the month.
State Corporate Net Income Tax	-	Tax is based on the taxable net income as defined by the Internal Revenue Service before the deduction for the Pennsylvania corporate net income tax. The tax rate is 8.49% of taxable income. The monthly accrual is based on the taxable income achieved from our level of operations for that month.	Accrual is computed monthly by applying the rate to taxable income for the month.

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III-L.25

Request:

For the HTY as recorded on the HTY's operating statement, supply all of the following:

III.L.25.a Amount of Federal income taxes actually paid.
III.L.25.b Amount of the Federal income tax normalizing charge to tax expense due to excess of accelerated tax depreciation over book depreciation.
III.L.25.c Normalizing tax charge to Federal income taxes for the 10% Job Development Credit during the test year.
III.L.25.d Amount of the credit of Federal income taxes due to the amortization or normalizing yearly debit to the reserve for the 10% Job Development Credit.
III.L.25.e Amount of the credit to Federal income taxes for the normalizing of any 3% Investment Tax Credit Reserve that may remain on the public utility's books.

Response:

a & b. Refer to NFGDC Exhibit A, Schedule D-11 for the Historic test year.

c. None.

d. None.

e. None.

Prepared by or under the supervision of: Erica Forcucci

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Responses to Section 53.53 - III-L-Taxes
Delivered on January 28, 2026

III-L.26

Request:

Provide the debit and credit for THE Job Development Credits for the HTY.

Response:

NFGDC has no Job Development Credits.

Prepared by or under the supervision of: Erica Forcucci

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-L-Taxes
Delivered on January 28, 2026

III-L.27

Request:

RECONCILE DATA GIVEN IN ANSWERS TO QUESTIONS ON INCOME TAXES CHARGED ON THE TEST YEAR OPERATING STATEMENT WITH REGARD TO INCOME TAXES PAID, INCOME TAXES CHARGED BECAUSE OF NORMALIZATION AND CREDITS DUE TO YEARLY WRITE-OFFS OF PAST YEARS' INCOME TAX DEFERRALS, AND FROM NORMALIZATION OF INVESTMENT TAX AND DEVELOPMENT CREDITS FOR BOTH STATE AND FEDERAL INCOME TAXES.

Response:

Refer to Schedules D-11 and D-12 in Exhibit A (Historic), Exhibit A (Future), and Exhibit A (Fully Projected). Also, refer to the Direct Testimony of Erica Forcucci, Statement No. 12.

The Company does not have investment tax or development credits.

Prepared by or under the supervision of: Erica Forcucci

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-L-Taxes
Delivered on January 28, 2026

III-L.28

Request:

With respect to determination of Federal and State income taxes, provide all of the following:

III.L.28.a Income tax results of the annualizing and normalizing adjustments to the HTY and the FTY before any rate increase.
III.L.28.b Income taxes, annualized and normalized, for the HTY and the FTY.
III.L.28.c Income tax effect of the requested rate increase.
III.L.28.d Income taxes for the normalized and annualized test year after application of the full requested rate increase.
III.L.28.e Projections for the FPFTY.

Response:

Refer to Schedules D-11 and D-12 in Exhibit A (Historic), Exhibit A (Future), and Exhibit A (Fully Projected), Section D.

Prepared by or under the supervision of: Erica Forcucci

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-M-Rate Structure, COSS, Bill Freq, and Special Contracts
Delivered on January 28, 2026

III-M.1

Request:

Rate Structure:

III.M.1.a Provide copies of THE present TARIFF OR TARIFFS and THE proposed TARIFF OR tariffs OR TARIFF SUPPLEMENT OR TARIFF SUPPLEMENTS.

III.M.1.b Provide a redlined document showing the changes [to a tariff] between the present tariff OR TARIFFS and the proposed tariff OR TARIFFS OR TARIFF SUPPLEMENT OR TARIFF SUPPLEMENTS.

III.M.1.c "Provide a schedule SHOWING, FOR each tariffed rate, all of the following information for the FPFTY:

i. Rate schedule designation.

ii. At present rates each of the following:

(a) Customers served as of end of FPFTY.

(b) Annual sales per billing determinant.

(c) Base rate revenues ANNUALIZED AT THE RATES IN EFFECT AS OF THE END OF the FPFTY.

(d) Tax surcharge revenues.

(e) Revenues received from other clauses or riders separately accounted for.

(f) Total of all revenues for FPFTY.

iii. At proposed rates, each of the following:

(a) Estimated number of customers whose charges for service will be increased or decreased as a result of this filing.

(b) The increase or decrease in base rate revenues and THE RESULTING percentage change.

(c) ANNUALIZED TAX SURCHARGE REVENUES UNDER PRESENT RATES AND AMOUNTS ROLLED-INTO BASE RATES.

(d) Revenues received from other clauses or riders separately accounted for.

(e) The increase or decrease in total of all revenues shown in annual dollar amount change and percentage change.

iv. PROVIDE A SUMMARY OF TOTAL revenue THAT SHOWS UTILITY REVENUE FROM ALL SOURCES, INCLUDING UTILITY OPERATING REVENUE (SEPARATELY FOR SALES AND OTHER OPERATING REVENUE), REVENUE FROM NON-JURISDICTIONAL SALES, AND NON-UTILITY REVENUE.

v. Provide the grand total revenue requirement showing both total sales and

revenues, as adjusted, and the various increases and decreases in rates, including percentage effects, at present and proposed rates.

Response:

a. Please see National Fuel Exhibit F.

b. Please see National Fuel Exhibit F.

c. (i) Please see Exhibits CTM-1-4 and CTM-2-4 for FPFTY rate schedule.

(ii) Please see testimony and exhibits of Company witness Courtney T. Mann, statement No. 14. The information requested in subparts (a) through (f) is summarized in Exhibit CTM-1.

(iii) Please see the testimony and exhibits of Company witness Courtney T. Mann, Statement No. 14. The information requested in subparts (a) through (e) is summarized in Exhibit CTM-2 and Exhibit E.

(iv) Not applicable.

(v) Please see Exhibit E – Proof of Revenue.

Prepared by or under the supervision of: Wanya' D. Bruce and Courtney T. Mann

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-M-Rate Structure, COSS, Bill Freq, and Special Contracts
Delivered on January 28, 2026

III-M.2

Request:

Cost of Service Allocation Study.

III.M.2.a	PROVIDE A COST OF SERVICE ALLOCATION STUDY ALLOCATING THE RATE BASE AND CLAIMED TOTAL COST OF SERVICE, OR REVENUE REQUIREMENT, TO EACH PROPOSED TARIFF RATE SCHEDULE. RATE SCHEDULES MAY BE COMBINED INTO CUSTOMER CLASSES FOR THIS PURPOSE. PROVIDE A STATEMENT DESCRIBING WHICH RATE SCHEDULES WERE COMBINED AND THE SUPPORTING EXPLANATIONS.
III.M.2.b	PROVIDE A COMPARATIVE SCHEDULE SHOWING THE REVENUES, FULLY ALLOCATED COSTS, AND RATE OF RETURN FOR EACH CUSTOMER CLASS, AND SERVICE AREA, IF APPLICABLE, AT BOTH PRESENT RATES AND PROPOSED RATES. IF THE STUDY CONSIDERS REVENUE SOURCES OTHER THAN BASE RATE REVENUES, PROVIDE AN EXPLANATION OF OTHER REVENUE SOURCES INCLUDED AND REASONS THEREFOR.
III.M.2.c	Provide a description of the complete methodologies used in the cost of service allocation study.
III.M.2.d	PROVIDE A STATEMENT ALONG WITH THE NECESSARY DATA SHOWING HOW THE PUBLIC UTILITY'S PROPOSED ASSIGNMENT OF THE OVERALL RATE CHANGE AMONG CUSTOMER CLASSES IS CONSISTENT WITH THE RESULTS OF THE COST OF SERVICE ALLOCATION STUDY AND OTHER ESTABLISHED REGULATORY CRITERIA.
III.M.2.e	Provide a statement along with the necessary data showing how the rate structure is JUST AND REASONABLE to all customer classes.
III.M.2.f	Provide a complete description and back-up calculations for each allocation factor. Provide a description of the allocation method used, such as, peak responsibility, average and excess, or any other method.
III.M.2.g	Provide a schedule of the allocated revenue requirement by customer class, and service area, if applicable, at both present rates and proposed rates.
III.M.2.h	Indicate if the allocation method used for the current rate case is consistent with the ALLOCATION METHOD USED IN THE immediately preceding base rate case. Explain the impact of any changes.
III.M.2.i	Provide a detailed cost analysis supporting the customer charges, showing all direct and indirect costs included.
III.M.2.j	Supply the average day, the maximum day and the maximum hour deliveries to the system, adjusted for storage, for the HTY and the 2 years immediately preceding the HTY.
III.M.2.k	Provide workpapers, analyses, comparative data or other documentation supporting the estimated maximum day and peak hour demands by customer class for the HTY, the FTY and the FPFTY.

National Fuel Gas Distribution Corporation
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Responses to Section 53.53 - III-M-Rate Structure, COSS, Bill Freq, and Special Contracts
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III.M.2.l PROVIDE THE FOLLOWING:
(2) FOR NATURAL GAS PUBLIC UTILITIES: EXPLAIN THE METHODOLOGY USED TO IDENTIFY TRANSMISSION MAINS FROM DISTRIBUTION MAINS."

III.M.2.m Provide a detailed explanation of how storage is used to meet base maximum day and maximum hour demands if applicable.

Response:

Please refer to Exhibit D and the Direct Testimony of John D. Taylor, National Fuel Gas Statement No. 19.

The response to III.M.2.j is attached.

Prepared by or under the supervision of: John D. Taylor

National Fuel Gas Distribution Corporation

Question: III.M.2.j - Supply the average day, the maximum day and the maximum hour deliveries to the system, adjusted for storage, for the HTY and the 2 years immediately preceding the HTY.

Response: Below is the Average and Max Day deliveries to the NFGDC PA Distribution system by month. Please note that this includes storage volumes delivered to the system as storage is upstream of the Distribution system.
The maximum hourly data is not available at this time.

Month	Average Day Dth	Max Day Dth
Oct-22	103,842	173,161
Nov-22	154,461	249,362
Dec-22	212,852	378,723
Jan-23	203,141	276,416
Feb-23	206,643	343,580
Mar-23	192,331	264,629
Apr-23	117,636	183,728
May-23	80,132	169,922
Jun-23	58,283	74,763
Jul-23	52,947	66,543
Aug-23	56,569	66,766
Sep-23	59,035	75,896
Oct-23	96,850	171,171
Nov-23	161,607	269,022
Dec-23	170,403	239,684
Jan-24	231,335	330,288
Feb-24	200,560	260,329
Mar-24	161,594	239,393
Apr-24	119,645	194,416
May-24	66,733	92,915
Jun-24	57,769	80,924
Jul-24	53,046	65,272
Aug-24	57,191	70,586
Sep-24	59,049	72,372
Oct-24	90,761	130,426
Nov-24	139,042	224,496
Dec-24	208,812	293,405
Jan-25	272,954	375,187
Feb-25	250,900	333,473
Mar-25	171,613	279,575
Apr-25	124,095	224,961
May-25	79,867	118,230
Jun-25	56,883	85,667
Jul-25	54,118	70,566
Aug-25	56,033	73,599
Sep-25	59,420	72,566

National Fuel Gas Distribution Corporation
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2026 Base Rate Case
Responses to Section 53.53 - III-M-Rate Structure, COSS, Bill Freq, and Special Contracts
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III-M.3

Request:

Bill Frequency Analysis.

III.M.3.a Submit a bill frequency analysis for each tariffed rate schedule. The billing analysis may consist of the use of bill frequency distributions or individual customer billing records for the most recent annual periods available. Display all billing determinants. Apply the blocking and corresponding prices of the present rates and the proposed rates to the determinants to derive the base rate revenues under both present rates and proposed rates. Use the derived base rate revenues as the basis for measuring the annual base rate effect of the rates in question for the test year.

III.M.3.b Supply a chart or tabulation of base rate bills for each rate schedule comparing the present rates to proposed rates. Show the dollar difference and the per cent increase or decrease.

Response:

Please see Exhibit CTM-9 for bill frequency analysis and tabulation.

Prepared by or under the supervision of: Courtney T. Mann

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-M-Rate Structure, COSS, Bill Freq, and Special Contracts
Delivered on January 28, 2026

III-M.4

Request:

Special Rate Contracts:

III.M.4.a State whether the public utility has negotiated special rates not specified in the currently effective tariff.

III.M.4.b Provide a listing of negotiated special rate contracts. Include a comparison of revenues for special rate contracts and under tariff rates.

Response:

The Company has negotiated special rates not specified in the currently effective tariff. Information related to these rates is CONFIDENTIAL. The Company is providing CONFIDENTIAL Attachment III-M-4 in a separately sealed envelope that is marked "CONFIDENTIAL". The Company hereby requests that the content of such envelope be placed in the Commission's NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such CONFIDENTIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.

Prepared by or under the supervision of: Courtney T. Mann

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-N-LTIIP/AAOP
Delivered on January 28, 2026

III-N.1

Request:

Provide docket numbers for the most recent LTIIP approved by the Commission as well as any pending LTIIP filed by the public utility.

Response:

Please refer to Docket No. P-2022-3034957 for the Company's First approved LTIIP filed on September 2, 2022. Also, refer to Docket No. P-2022-3034957 for the Company's modified LTIIP filed on December 11, 2025 and still pending before the Commission.

Prepared by or under the supervision of:

Donald N. Koch

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 - III-N-LTIIP/AAOP
Delivered on January 28, 2026

III-N.2

Request:

Provide docket numbers for AAO Plan(s) approved since the most recent approved LTIIP and a copy of pending AAO Plan(s) filed by the public utility.

Response:

Please refer to Docket No's M-2024-3047561 and M-2025-3053683 for approved AAO Plans.

Prepared by or under the supervision of: Donald N. Koch

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 – IV-B-Natural Gas Utilities
Delivered on January 28, 2026

IV-B.1

Request:

Address lost and unaccounted-for gas:

IV.B.1.a Provide a schedule that shows the percentage of lost and unaccounted-for gas for the natural gas distribution system for the HTY and 2 years immediately preceding the HTY.

IV.B.1.b Describe how the amount in previously listed B.1. was determined and explain any steps taken to reduce lost and unaccounted-for gas.

Response:

a. Please see Attachment IV-B.1 for a schedule that shows the percentage of lost and unaccounted-for gas for the natural gas distribution system for the HTY and 2 years immediately preceding the HTY.
b. The Company's method for calculating lost and unaccounted-for gas, as well as the steps taken to reduce it, is detailed in 1307(f) (Docket No. R-2026-3059551), within the direct testimony of Shannon Putnam, detailed in Exhibit CEH-2.

Prepared by or under the supervision of: Cathryn E. Hilliard

National Fuel Gas Distribution Corporation
Pennsylvania Division
Historical Loss and Unaccounted For
Volumes in Mcf

	A				B			C			D		E			
	(1) Gas Received From Production Facilities	(2) Gas Received From Interstate Pipelines	(3) Gas Received From Other Sources	(4) Gas Received Total	(5) Gas Delivered To Customers	(6) Gas Delivered To Interstate Pipeline	(7) Gas Delivered Total	(8) Located & Repaired Breaks in Mains/Services	(9) Distribution Company Use	(10) Adjustments Total	(11) Distribution Unaccounted-For- Gas	(12) Percent Unaccounted-For- Gas	(13) 12 Mth Unaccounted-For- Gas	(14) 60 Mth Unaccounted-For- Gas	(15) 12 Mth Company Use	(16) 60 Mth Company Use
Sep-25	174,813	1,554,233	2,973	1,732,243	1,339,822	0	1,737,046	3	71	74	-4,877	-0.28%	-0.50%	-0.49%	0.02%	0.02%
Aug-25	174,405	1,512,008	1,925	1,688,395	1,343,935	0	1,756,308	1,277	26	1303	-69,216	-4.10%	-0.55%	-0.51%	0.02%	0.02%
Jul-25	173,154	1,481,129	1,864	1,656,262	1,329,265	0	1,655,616	219	86	305	341	0.02%	-0.44%	-0.49%	0.02%	0.02%
Jun-25	172,911	1,510,800	2,462	1,686,628	1,280,487	0	1,655,702	134	311	445	30,481	1.81%	-0.38%	-0.50%	0.02%	0.02%
May-25	184,070	2,207,658	6,619	2,399,013	1,583,868	0	2,496,284	3	418	421	-97,692	-4.07%	-0.47%	-0.56%	0.02%	0.02%
Apr-25	175,685	3,412,518	8,793	3,597,915	2,036,778	0	3,700,719	1,081	763	1844	-104,648	-2.91%	-0.39%	-0.54%	0.02%	0.02%
Mar-25	181,786	4,925,394	12,276	5,121,154	2,722,471	0	5,301,301	20	1212	1232	-181,379	-3.54%	-0.25%	-0.52%	0.02%	0.02%
Feb-25	153,281	6,571,552	5,581	6,732,225	3,159,596	0	6,877,717	954	-830	124	-145,616	-2.16%	-0.20%	-0.57%	0.02%	0.02%
Jan-25	159,395	7,906,373	24,343	8,091,905	3,614,064	0	7,874,248	26	2714	2740	214,917	2.66%	-0.04%	-0.44%	0.02%	0.02%
Dec-24	172,936	6,017,720	5,760	6,197,735	2,906,405	0	6,067,710	56	1794	1850	128,175	2.07%	-0.20%	-0.48%	0.02%	0.02%
Nov-24	179,833	3,829,465	6,174	4,016,002	2,155,554	0	3,958,876	139	650	789	56,337	1.40%	-0.46%	-0.44%	0.02%	0.02%
Oct-24	187,138	2,527,239	5,025	2,719,575	1,756,156	0	2,774,075	269	212	481	-54,981	-2.02%	-0.46%	-0.34%	0.02%	0.02%
Sep-24	184,519	1,537,408	2,295	1,724,358	1,383,425	0	1,752,164	373	109	482	-28,288	-1.64%	-0.39%	-0.42%	0.01%	0.02%
Aug-24	185,479	1,538,424	2,175	1,726,165	1,388,573	0	1,744,455	121	65	186	-18,476	-1.07%	-0.41%	-0.44%	0.01%	0.02%
Jul-24	186,571	1,408,657	3,302	1,598,969	1,264,842	0	1,572,811	523	173	696	25,463	1.59%	-0.45%	-0.44%	0.01%	0.02%
Jun-24	183,629	1,495,687	4,704	1,684,278	1,319,656	0	1,693,139	64	255	319	-9,180	-0.55%	-0.46%	-0.46%	0.01%	0.02%
May-24	205,203	1,809,898	6,115	2,021,966	1,485,109	0	2,079,237	58	365	423	-57,694	-2.85%	-0.48%	-0.47%	0.01%	0.02%
Apr-24	193,878	3,257,680	13,277	3,465,894	2,088,932	0	3,508,546	95	700	795	-43,447	-1.25%	-0.53%	-0.52%	0.01%	0.02%
Mar-24	194,888	4,587,257	15,394	4,798,926	2,507,526	0	4,955,215	5	904	909	-157,198	-3.28%	-0.61%	-0.55%	0.01%	0.02%
Feb-24	189,199	5,361,008	20,683	5,572,693	2,737,099	0	5,645,913	24	1228	1252	-74,472	-1.34%	-0.34%	-0.47%	0.01%	0.02%
Jan-24	197,264	6,675,235	15,145	6,889,474	3,176,930	0	6,740,832	2	1097	1099	147,543	2.14%	-0.21%	-0.56%	0.01%	0.02%
Dec-23	197,798	4,874,761	11,040	5,084,992	2,565,318	0	5,062,001	2	833	835	22,157	0.44%	-0.77%	-0.38%	0.01%	0.02%
Nov-23	202,956	4,445,106	16,591	4,665,393	2,461,785	0	4,610,162	4	372	376	54,855	1.18%	-0.48%	-0.42%	0.01%	0.02%
Oct-23	212,555	2,678,628	7,607	2,899,065	1,843,630	0	2,923,329	198	114	312	-24,576	-0.85%	-0.34%	-0.32%	0.01%	0.02%
Sep-23	195,732	1,530,944	6,314	1,733,181	1,333,753	0	1,770,305	528	49	577	-37,701	-2.18%	-0.44%	-0.33%	0.01%	0.02%
Aug-23	208,976	1,484,997	6,783	1,700,756	1,737,926	0	1,737,926	235	30	265	-37,435	-2.20%	-0.62%	-0.36%	0.01%	0.02%
Jul-23	197,424	1,397,558	6,173	1,601,155	1,580,214	0	1,580,214	373	50	423	20,518	1.28%	-0.80%	-0.34%	0.01%	0.02%
Jun-23	206,476	1,499,433	6,477	1,712,386	1,726,124	0	1,726,124	162	226	388	-14,126	-0.82%	-0.78%	-0.35%	0.01%	0.02%
May-23	211,957	2,191,054	8,291	2,411,302	2,491,338	0	2,491,338	178	384	562	-80,598	-3.34%	-0.84%	-0.36%	0.01%	0.02%
Apr-23	200,506	3,175,443	7,414	3,383,363	3,463,779	0	3,463,779	155	659	814	-81,230	-2.40%	-0.92%	-0.49%	0.01%	0.02%
Mar-23	204,627	5,493,793	11,169	5,709,589	5,753,045	0	5,753,045	2	1042	1044	-44,500	-0.78%	-0.99%	-0.38%	0.02%	0.02%
Feb-23	185,022	5,339,487	19,776	5,544,285	5,559,492	0	5,559,492	10	1210	1220	-16,427	-0.30%	-1.20%	-0.25%	0.02%	0.02%
Jan-23	211,610	5,818,905	838	6,031,353	6,122,211	0	6,122,211	3	1202	1205	-92,063	-1.53%	-0.92%	-0.31%	0.02%	0.02%
Dec-22	208,955	6,084,031	13,865	6,306,851	6,161,663	0	6,161,663	5	1021	1026	144,162	2.29%	-0.48%	-0.15%	0.02%	0.02%
Nov-22	212,684	4,211,824	10,209	4,434,717	4,318,782	0	4,318,782	81	389	470	115,465	2.60%	-0.67%	-0.12%	0.02%	0.02%
Oct-22	237,731	2,845,360	1,405	3,084,496	3,153,301	0	3,153,301	212	262	474	-69,279	-2.25%	-0.65%	-0.14%	0.02%	0.02%

National Fuel Gas Distribution Corporation
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Responses to Section 53.53 – IV-B-Natural Gas Utilities
Delivered on January 28, 2026

IV-B.2

Request:

Supply an exhibit showing the gas deliveries to each customer class for the most recent 24-month period. Identify the source of the gas, such as "purchased" (pipeline), "production" (includes purchases from local producers), "storage withdrawal," "propane/air" and "unaccounted-for."

Response:

Please see Attachment IV-B.2 for a schedule that shows the gas deliveries to each customer class for the most recent 24-month period and the source of the gas.

Prepared by or under the supervision of: Cathryn E. Hilliard and Courtney T. Mann.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
MONTHLY USAGE & SUPPLY - TWELVE MONTHS ENDED SEPTEMBER 30, 2025
VOLUMES IN MCF

	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25
Requirements												
Residential	465,669	983,008	2,324,607	3,216,276	3,300,097	2,612,976	1,757,786	938,270	533,774	261,990	262,783	331,513
Commercial	84,492	166,956	375,083	561,342	618,169	497,591	321,789	169,309	103,643	64,132	61,685	73,734
Industrial	8,340	14,492	28,586	50,369	53,236	44,103	28,185	15,872	8,797	5,679	6,769	7,041
Public Authority	4,116	10,408	25,214	42,288	41,850	33,457	22,390	10,861	5,901	3,471	2,462	2,853
Total Retail	562,617	1,174,863	2,753,490	3,870,275	4,013,352	3,188,127	2,130,150	1,134,311	652,115	335,272	333,699	415,141
Company Use	174	588	1,766	2,656	2,788	2,282	1,308	655	296	68	44	114
Total Requirements	562,791	1,175,452	2,755,256	3,872,930	4,016,140	3,190,409	2,131,458	1,134,966	652,411	335,340	333,743	415,255
Supply												
Upstream Purchases	1,307,527	1,715,483	1,183,127	1,979,359	2,394,613	2,225,700	1,502,095	1,971,289	1,769,437	1,586,304	1,350,533	1,348,820
Local Purchases	18,878	15,736	21,909	16,864	15,988	11,970	17,951	19,662	20,310	19,572	14,364	12,720
Other	(587)	(512)	2,413	3,617	2,845	19,314	1,024	986	12,249	(2,782)	(454)	(612)
Off-System Sales	-	-	-	-	-	-	-	-	-	-	-	-
Total Purchases	1,325,818	1,730,707	1,207,449	1,999,840	2,413,446	2,256,984	1,521,070	1,991,937	1,801,996	1,603,094	1,364,443	1,360,928
Storage	(1,000,271)	(803,451)	780,068	1,231,026	2,275,264	1,488,133	795,475	(360,568)	(1,001,543)	(1,126,959)	(979,070)	(958,910)
Shrinkage	(25,241)	(30,560)	(23,041)	(39,744)	(56,205)	(45,525)	(30,815)	(41,213)	(38,885)	(34,888)	(30,424)	(32,226)
Unaccounted For	63,763	140,422	(206,436)	(52,454)	(435,797)	70,351	590,540	206,590	216,457	(405,383)	(102,005)	51,388
Unbilled Estimate	(9,164)	477,522	591,640	364,959	316,039	(255,923)	(515,568)	(381,026)	(216,890)	(420,620)	10,319	83,198
Total Supply	354,905	1,514,640	2,349,680	3,503,627	4,512,747	3,514,020	2,360,702	1,415,720	761,135	(384,756)	263,263	504,378

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
MONTHLY USAGE & SUPPLY - TWELVE MONTHS ENDED SEPTEMBER 30, 2024
VOLUMES IN MCF

	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24
Requirements												
Residential	515,817	1,165,674	2,129,779	2,670,058	2,652,924	2,100,762	1,860,693	829,343	416,625	283,543	260,822	302,811
Commercial	86,188	189,604	341,519	453,670	468,674	366,993	318,440	143,444	78,796	60,618	55,321	67,749
Industrial	9,301	10,946	25,442	34,161	37,963	29,314	23,775	12,368	5,131	4,540	7,992	6,202
Public Authority	4,287	12,276	23,237	32,767	32,465	25,612	21,284	10,349	3,698	2,700	1,867	1,939
Total Retail	615,593	1,378,499	2,519,977	3,190,655	3,192,026	2,522,680	2,224,192	995,504	504,250	351,401	326,003	378,700
Company Use	174	588	1,766	2,656	2,788	2,282	1,308	655	296	68	44	114
Total Requirements	615,767	1,379,087	2,521,743	3,193,311	3,194,814	2,524,963	2,225,500	996,159	504,547	351,469	326,046	378,814
Supply												
Upstream Purchases	1,540,427	2,087,257	1,416,342	1,532,248	1,800,135	1,547,683	1,272,261	1,875,792	1,477,639	1,291,083	1,265,281	1,358,553
Local Purchases	20,285	19,617	17,478	16,228	17,809	17,641	15,452	18,778	24,823	18,943	15,046	22,048
Other	3,449	3,536	(57,667)	13,144	8,135	10,837	16,359	11,777	3,952	3,495	1,777	341
Off-System Sales	-	-	-	-	-	-	-	-	-	-	-	-
Total Purchases	1,564,161	2,110,410	1,376,153	1,561,620	1,826,079	1,576,161	1,304,072	1,906,347	1,506,414	1,313,521	1,282,104	1,380,942
Storage	(1,155,322)	(1,044,896)	795,714	937,677	1,958,921	1,357,267	1,024,197	(470,544)	(979,391)	(973,927)	(913,395)	(979,866)
Shrinkage	(23,667)	(31,039)	(21,791)	(24,545)	(35,862)	(29,895)	(20,839)	(34,573)	(28,831)	(24,420)	(23,945)	(25,385)
Unaccounted For	44,584	49,930	(1,348)	2,309	(255,424)	6,444	186,134	124,256	106,920	64,710	(26,064)	(35,201)
Unbilled Estimate	61,627	473,155	758,987	(59,820)	304,890	(288,313)	(19,399)	(735,722)	(397,489)	(118,546)	(16,150)	28,499
Total Supply	491,383	1,557,560	2,907,715	2,417,241	3,798,604	2,621,664	2,474,165	789,764	207,623	261,338	302,550	368,989

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
2026 Base Rate Case
Responses to Section 53.53 – IV-B-Natural Gas Utilities
Delivered on January 28, 2026

IV.B.3

Request:

Provide, with respect to the scope of operations of the utility, a description of all property, including an explanation of the system's operation, and plans for significant future expansion, modification or other alteration of facilities. Include all of the following:

IV.B.3.a If the public utility has multiple natural gas service areas, indicate if the service areas are integrated such that the gas supply is available to all customers.

IV.B.3.b Provide pertinent data regarding policy related to the addition of new consumers in the public utility's service area.

Response:

IV.B.3.a
See attached and please note these pages are CONFIDENTIAL. The Company is providing these pages in a separately sealed envelope that is marked "CONFIDENTIAL." The Company hereby requests that the content of such envelope be placed in the Commission's NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such CONFIDENTIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.

The National Fuel Gas Distribution Corporation ("Distribution") – Pennsylvania Rate Jurisdiction is a public utility providing, in a 14-county area of northwestern Pennsylvania, gas service to 195,342 residential, 16,021 commercial and public authority customers and 591 industrial customers as of October 2025. All of the many local distribution systems are interconnected although, in many instances, they are interconnected by means of pipelines of National Fuel Gas Supply Corporation ("Supply"). Major municipalities located within the area serviced by Distribution include Erie, Meadville, Sharon, Franklin, Oil City, Clarion, Corry, Warren, DuBois, and Bradford. The majority of gas supplies for the Pennsylvania Division gas requirement are brought to Distribution through Supply and three other interstate pipelines. These pipelines are Tennessee Gas Pipeline Company ("TGP"), Texas Eastern Transmission, LP ("TETCO"), and Columbia Gas Transmission, LLC ("Columbia"). See attached Schedule No. 1 for a summary and the most recent agreements with the pipelines listed above Distribution

IV.B.3 (Continued)

allocates portions of the Supply EFT Service Agreement #E00528 contract and the TGP Service Agreement 2752 contract to New York and Pennsylvania.

IV.B.3.b

Distribution is permitted to attach new customers under the terms and conditions contained in the Company's tariff, the Commission's regulations codified at 52 Pa. Code Ch. 59 and orders of the Commission adopted pursuant thereto.

Prepared by or under the supervision of: Christopher A. Cej

National Fuel Gas Distribution Corporation
Docket No. R-2025-3059428
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IV-B.4

Request:

Explain how the public utility obtains its gas supply for each of the following:

IV.B.4.a Explain how it stores or manufactures gas if applicable.
IV.B.4.b State whether it has peak shaving facilities.
IV.B.4.c Provide details of coal-gasification programs if any.
IV.B.4.d Describe the potential and process for emergency purchases of gas.
IV.B.4.e Provide the amount of gas in MCF supplied by various suppliers in the test year. (Include a copy of all contracts).
IV.B.4.f Provide the amount of gas in MCF supplied from public utility-owned wells during the HTY and projected for the FTY and FPFTY.

Response:

IV.B.4.a See attached and please note these pages are CONFIDENTIAL. The Company is providing these pages in a separately sealed envelope that is marked "CONFIDENTIAL." The Company hereby requests that the content of such envelope be placed in the Commission's NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such CONFIDENTIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.

Distribution has no facilities to store or manufacture gas but has entered into gas storage service agreements with Supply and Columbia. Of these storage agreements, Distribution relies most heavily on the Supply services. Pursuant to the governing procedures for confidential treatment of submitted materials, a summary and the most recent storage agreements with Supply and Columbia are attached in Schedule No. 2. Distribution allocates portions of the Supply Service Agreement #G00539 contract to New York and Pennsylvania.

IV.B.4.b Distribution does not own or operate peak shaving facilities.

IV.B.4.c Distribution is unaware of gas supplies obtained from its suppliers as produced through coal gasification processes or programs.

IV.B.4.d Distribution does not expect to make any emergency purchases of gas.

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IV.B.4.e Please refer to Exhibit No. IV.B.14 for the gas supplied by upstream suppliers. This is the volume figure noted in the row called "Upstream Purchases" at pages 2 and 3. Gas purchased from independent producers is shown in total in the next row. Pursuant to the governing procedures for confidential treatment of submitted materials, a copy of Distribution's confidential standard long-term contracts (Master Agreement & NAESB) for supplies is provided at Schedule No. 3 and will be available subject to a protective order.

IV.B.4.f Distribution does not own gas wells.

Prepared by or under the supervision of: Christopher A. Cej

National Fuel Gas Distribution Corporation
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Responses to Section 53.53 – IV-B-Natural Gas Utilities
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IV.B.5

Request:

Address plans for future gas supply including each of the following:

IV.B.5.a Supply details of anticipated gas supply from its near-term development of gas wells, if any.

IV.B.5.b Provide gas supply agreements and well development ventures and identify the parties thereto.

Response:

IV.B.5.a Distribution does not own gas wells, nor does it plan to drill or otherwise acquire gas wells in the future.

IV.B.5.b

See attached and please note these pages are CONFIDENTIAL. The Company is providing these pages in a separately sealed envelope that is marked "CONFIDENTIAL." The Company hereby requests that the content of such envelope be placed in the Commission's NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such CONFIDENTIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.

Schedule No. 3 contains sample copies of Distribution's Master and NAESB contracts. Distribution would execute a NAESB contract for future gas supply transactions with future suppliers. As stated in response (a), Distribution does not plan to participate in future gas well development ventures.

Prepared by or under the supervision of: Christopher A. Cej

National Fuel Gas Distribution Corporation
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2026 Base Rate Case
Responses to Section 53.53 – IV-B-Natural Gas Utilities
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IV.B.6

Request:

Indicate curtailments in the HTY and anticipated curtailments in the FTY and the FPFTY. Explain the reasons for the curtailments and the basis for projected the anticipated curtailments.

Response:

There were no curtailments in the HTY nor does Distribution anticipate curtailments in the FTY or the FPFTY.

Prepared by or under the supervision of: Christopher A. Cej

National Fuel Gas Distribution Corporation
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IV.B.7

Request:

Provide current data on any FERC action or programs that may affect or tend to affect the natural gas supply to the public utility.

Response:

Distribution can be impacted by Federal regulations and actions covering the sources, transportation, and prices associated with suppliers providing gas to Distribution.

Distribution participates and actively represents its position as a local distribution company in FERC proceedings that may have a direct impact on it. Distribution's activity at the FERC during the past year was provided in Distribution's 1307(f) proceeding at PGC Exhibit No. 6 which is incorporated in Exhibit No. 12, Schedule No. 8.

Prepared by or under the supervision of: Christopher A. Cej

National Fuel Gas Distribution Corporation
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Responses to Section 53.53 – IV-B-Natural Gas Utilities
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IV-B.8

Request:

To the extent applicable, provide the annual recorded expenses by USoA for the HTY and as projected for the FTY and FPFTY by account. Identify all accounts used but not specifically listed in B.9 as follows.

Response:

Please refer to the response to III-B.10.

Prepared by or under the supervision of: Donald Koch

National Fuel Gas Distribution Corporation
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IV-B.9

Request:

To the extent applicable, provide the annual recorded natural gas production expenses by USoA for the HTY and as projected for the FTY and FPFTY by all of the following accounts: (See List)

Natural Gas Production and Gathering Operation Acct 750 – 760
Maintenance 761 – 769
Products Extraction Operation 760 – 783
Maintenance 784 – 791
Exploration and Development Expenses Operation 795 – 798
Other Gas Supply Expenses Operation 800 – 813
Underground Storage Expenses Operation 814 – 826
Maintenance 830 – 837
Other Storage Expenses Operation 840 – 842.4
Maintenance 843 – 848.3
Transmission Expenses Operation 850 – 860
Maintenance 861 - 867

Response:

Natural Gas Production Expenses for National Fuel Gas Distribution Corporation (Pennsylvania Division), for applicable accounts, for periods ending September 30, 2025 (HTY), September 30, 2026 (FTY) and October 31, 2027 (FPFTY).

Natural Gas Production and Gathering Operation 750 – 760:

		September 30, 2025	September 30, 2026	October 31, 2027
750	Operation Supervision & Engineering	$ 24	$ 9	$ 9
753	Field Line Expense	18,086	19,538	19,948
754	Field Compressor Station Expenses	3,792	4,039	3,043
756	Field Meas. & Reg. Station Expense	366	383	403
757	Purification Expense	714	778	789
759	Other Expense	(21)	(23)	(23)
	Total Natural Gas Production and Gathering Operation Expenses	$ 22,960	$ 24,723	$ 24,169

Maintenance 761 – 769:

		September 30, 2025	September 30, 2026	October 31, 2027
764	Maintenance of Field Lines	$ 469	$ 416	$ 445
765	Maintenance of Field Compressor Station Equipment	(256)	(279)	(283)
766	Maintenance of Field Meas. & Reg Station Equipment	46	46	-
767	Maintenance of Purification Equipment	11	11	12
769	Maintenance of Other Equipment	3,187	2,973	4,393
	Total Maintenance Expenses	$ 3,456	$ 3,167	$ 4,567

National Fuel Gas Distribution Corporation
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Other Gas Supply Operation Expenses 800 – 813:

		September 30, 2025	September 30, 2026	October 31, 2027
801	Natural Gas Field Line Expense	$ 61,792,871	$ 61,557,342	$ 64,644,919
804	Natural Gas City Gate Purchases	50,523	50,330	52,855
805.1	Purchased Gas Cost Adjustments	527,763	0	0
805.13	Other Purchased Gas Adjustments	(15,446,022)	0	0
806	Transportation Imbalance	538,525	536,472	563,381
807.2	Operation Purchase Gas Measuring St	76,192	0	0
807.3	Maintenance Purchase Gas Med Str	11,808	0	0
807.5	Other Purchase Gas Expense	84,547	0	0
808.1	Gas Withdrawn From Storage	39,840,504	39,688,648	41,679,341
808.2	Gas Delivered To Storage	(38,889,719)	(38,741,487)	(40,684,673)
812	Gas Used Othr Utility Operations	(37,576)	0	0
	Total Other Gas Supply Operation Expenses	$ 48,549,414	$ 63,091,305	$ 66,255,822

Underground Storage Operation Expenses 814 – 826:

		September 30, 2025	September 30, 2026	October 31, 2027
826.1	Storage Rents	$ 15,746,340	$ 15,686,321	$ 16,473,112

Page 2

Transmission Operation Expenses 850 – 860:

		September 30, 2025	September 30, 2026	October 31, 2027
850	Transporation Operation Supervison & Engineering	$ 3,278	$ 1,660	$ 1,715
851	Transportation Operation Controll & Load Dispatch	31,173	31,918	31,918
853	Transporation Compressor Labor	9,093	9,119	4,538
854	Transportation Gas for Compressor Fuel	396	0	0
856	Transportation Maintenance Expense	615,691	618,242	641,575
857	Transportation Measurement & Regulator Expense	50,797	52,643	68,242
858.1	Transportation & Compressor by Others	38,058,518	37,913,455	39,815,108
859	Transportation Other Expenses	48,689	50,329	45,329
860	Transportation Rents	7	7	7
	Total Transmission Operation Expenses	$ 38,817,641	$ 38,677,372	$ 40,608,432

Maintenance 861 - 867:

		September 30, 2025	September 30, 2026	October 31, 2027
861	Transportation Maintenance Supervision & Engineering	$ 58	$ 22	$ 22
862	Transportation Maintenance Structures	16,614	16,608	14,577
863	Transportation Maintenance Mains	130,538	128,839	115,872
865	Transportation Maintenance Measurement & Regultor Statation Equipment	24,419	24,743	31,657
867	Transportation Maintainance Other Equipment	15,041	15,272	24,769
		$ 186,670	$ 185,484	$ 186,897

Prepared by or under the supervision of: Michael J. Maggioli and Donald N. Koch

BOOK II

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

BEFORE

THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Information Submitted Pursuant to

Section 53.51 et seq of the Commission's Regulations

SUPPLEMENTAL DATA REQUESTS:
COST OF SERVICE
RATE OF RETURN
REVENUE REQUIREMENTS

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
GAS - PA P.U.C. NO. 9
SUPPLEMENT NO. 294

DOCKET NO. R-2025-3059428

Issued: January 28, 2026 **Effective: March 29, 2026**

SUPPLEMENTAL DATA REQUESTS

COST OF SERVICE

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-01:

Please explain the Company's policy with regard to when customer advances and contributions in aid of construction must be made.

Response:

The Company's policy on customer advances is found on Page 16B of Pa. P.U.C No. 9 (included in this filing under National Fuel Gas Exhibit F - Current Tariff). The tariff language states that "Construction of any extension or installation of excess flow valves or natural gas related equipment or facilities not otherwise required by regulation will not be undertaken until the amount of the applicant's contribution has been paid to the Company by the applicant. In the case of an excess flow valve or natural gas related equipment or facilities not otherwise required by regulation, the amount of the applicant's contribution will be determined based upon the Company's cost to install such equipment. The actual construction of the extension shall be scheduled at the Company's discretion."

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-02:

Please provide a detailed explanation describing how contributions in aid of construction and customer advances are reflected in the Company's cost of service study.

Response:

The cost and plant information provided in the cost of service study is based on the Company costs and investments net of any customer contributions in aid of construction and customer advances.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-03:

Please provide a breakdown of contributions in aid of construction by customer class and plant account number for the most recent year available.

Response:

The table below shows a summary of customer contributions by account for the 12 months period ended September 30,2025.

	Non-Residential	Residential
Account 334	$9,000	$0
Account 365	$505.25	$0
Account 376	$269,033.63	$8,988.93
Account 397	$11,050.00	$0
Total	$289,588.88	$8,988.93

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-04:

Please provide a breakdown of transmission and distribution mains investment by pipe diameter.

Response:

Please see Attachment COS-4.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Attachment COS-4
Account 367 - Transmission Mains Investment by Pipe Diameter
As of September 30, 2025

Main Size (Inches)	Original Cost ($) Mains	Valves	Total
2.000	$ 437,624	$ -	$ 437,624
3.000	44,697	496	$ 45,192
4.000	1,348,118	26,436	$ 1,374,554
6.000	14,909,172	287,975	$ 15,197,147
6.250	1,017	-	$ 1,017
6.625	48,124	-	$ 48,124
8.000	26,006,651	169,568	$ 26,176,219
8.625	2,340,929	-	$ 2,340,929
10.000	1,269,348	7,429	$ 1,276,777
12.000	13,596,549	242,651	$ 13,839,201
16.000	58,000	-	$ 58,000
20.000	5,759	-	$ 5,759
Subtotal	$ 60,065,989	$ 734,554	$ 60,800,543
Drip			$ 28,045
Rectifiers			3,756,969
Other			1,428,932
Total			$ 66,014,490

National Fuel Gas Distribution Corporation
Pennsylvania Division
Attachment COS-4
Account 376 - Distribution Mains Investment by Pipe Diameter
As of September 30, 2025

Main Size (Inches)	Original Cost ($)
0.999	$ 16,418
1.000	14,651
1.125	1,405,139
1.250	2,647,214
1.500	132,320
1.625	7,925
2.000	153,288,695
2.500	2,495
3.000	30,768,985
4.000	98,865,251
4.250	2,452
4.500	1,419
5.000	2,507
5.250	2,965
5.625	2,787
6.000	28,171,345
6.250	18,854
6.625	398,586
7.000	2,777
8.000	37,731,595
8.250	2,406
8.625	1,787
10.000	1,478,540
12.000	7,785,237
14.000	6,194
16.000	1,360,261
20.000	7,517,669
24.000	4,704
	$ 371,641,179

Number of Customers	214,581
Avg Cost per Cust	$ 1,731.94

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-05:

Please provide a breakdown of customer advances by customer class for the most recent year available.

Response:

See the responses to COS-01 through COS-03.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-06:

Please provide a breakdown of services investment by service line diameter, and a breakdown of services by size and customer class.

Response:

Please see Attachment COS-6.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Attachment COS-6
Account 380 - Services
As of September 30, 2025

Service Size	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS	Total
1/2"	$ 96,488	$ 1,048	$ 3,213	$ 1,198	$ -	$ -	$ -	$ -	$ -	$ 101,947
5/8"	68,947,676	2,430,504	503,337	73,072	-	17,838	5,630	-	1,283	71,979,339
3/4"	120,351	3,143	-	-	-	-	-	-	-	123,494
7/8"	17,490,331	374,004	118,873	8,385	-	3,345	2,815	-	-	17,997,753
1"	8,882,116	225,241	92,100	51,510	-	2,230	5,630	1,586	2,566	9,262,978
1 1/8"	83,494,592	4,455,574	2,375,324	588,171	-	100,336	88,667	4,757	5,133	91,112,555
1 1/4"	2,770,150	200,098	128,512	79,062	-	2,230	16,889	-	-	3,196,939
1 1/2"	9,188,182	277,622	97,455	69,478	-	1,115	2,815	1,586	-	9,638,252
2"	6,803,890	962,111	1,002,756	959,870	1,211	80,529	271,913	16,991	5,317	10,104,588
3"	798,505	88,453	110,878	173,118	-	8,231	34,525	7,561	2,219	1,223,490
4"	925,626	44,092	25,211	22,261	366	1,477	6,867	1,698	1,539	1,029,136
6"	160,382	-	-	3,547	578	-	1,118	412	1,365	167,402
8"	18	226	-	-	-	-	-	-	236	480
12"	-	-	-	-	-	-	-	-	6,235	6,235
Total	$ 199,678,306	$ 9,062,115	$ 4,457,658	$ 2,029,674	$ 2,155	$ 217,330	$ 436,867	$ 34,590	$ 25,894	$ 215,944,588

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-07:

If available, please provide a breakdown of meter investment by meter size, and a breakdown of meters by size and customer class.

Response:

Please see Attachment COS-07.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Attachment COS-07
Account 381 - Meter Size and Original Cost
As of September 30, 2025

Plant Data Meter Info	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	SVIS	IVIS	LVIS	LIS	NGV	Total
42808 - Meter-Turb&Orif T140								$ 33,889		$ 33,889
42807 - Meter-Turb&Orif T60				283		283	566	850		1,983
42806 - Meter-Turb&Orif T30				1,299		1,113	1,299	742	186	4,638
42805 - Meter-Turb&Orif T18				-		-		-		-
42714 - Meter-Rty Roots DR 11C	1,420	3,551	11,363	4,971	1,420	710				23,436
42713 - Meter-Rty Roots DR 15C	52,227	74,833	222,939	119,265	22,606	17,929	780			510,578
42712 - Meter-Rty Roots DR 2M	43	77	180	137	9	34				481
42707 - Meter-Rty Roots DR 16M			1,343	10,746		2,686	10,746	5,373	2,686	33,580
42706 - Meter-Rty Roots DR 11M			1,638	60,616		24,574	4,915			91,743
42705 - Meter-Rty Roots DR 7M		946	4,732	72,879	4,732	27,448	2,839	3,786	946	118,309
42704 - Meter-Rty Roots DR 5M	3,379	2,628	16,518	94,603	3,754	26,278	2,628			149,787
42703 - Meter-Rty Roots DR 3M	23,992	33,661	136,433	200,890	14,324	38,674	1,074	358		449,406
42702 - Meter-Rty Roots DR1.5M	-	-	-	-	-	-				-
42701 - Meter-Rty Roots DR8C	-	-	-	-	-	-				-
42618 - Meter-Elc Romet ADEM-T		2,356	2,356	88,344	1,178	47,117	5,890		1,178	148,417
42615 - Meter-Rty Romet 1.5M	12,312	15,390	65,666	27,703	3,078	2,052				126,202
42614 - Meter-Rty Romet 16M				5,936		5,936	3,957	1,979	3,957	21,765
42613 - Meter-Rty Romet 11M				17,436		15,257	9,808	2,180	1,090	45,770
42612 - Meter-Rty Romet 7M			1,017	8,135						9,152
42611 - Meter-Rty Romet 5M	1,689	845	4,224	20,273		2,534				29,565
42610 - Meter-Rty Romet 3M	6,410	16,482	54,026	86,991	7,326	24,724	916		916	197,790
42608 - Meter-Rty Romet 2M	-		-	-						-
42510 -Meter-SensusSonix 880	324,555	209,712	333,114	37,092	10,343	2,853				917,669
42503 - Mtr - Itron - 400	124,117	39,478	19,200	686	686	196	98			184,461
42502 - Meter - Itron 250	310,631	19,357	1,625		141			71		331,824
42402 - Meter-Sprag Alu 250	47,045	1,318	166							48,529
42313 - Meter-Rock/equ Al R275	3,327,505	176,184	14,289	2,453	675	61	61			3,521,228
42310 - Meter-Rockw Alu R10000						780				780
42309 - Meter-Rockw Alu R5000	256	205	563	614		102				1,741
42308 - Meter-Rockw Alu R3000	-		-	-						-
42306 - Meter-Rockw Alu R750	2,163	2,781	4,532	773		103				10,352
42305 - Meter-Rockw Alu R415	-	-	-							-
42304 - Meter-Rockw Al R250/75	43,404	1,722	150	7	2					45,286
42303 - Meter-Rockw Alu R175	32									32
42210 - Meter-Amer Al AL 5000	310	310	310	5,581		930				7,441
42209 - Meter-Amer Al AL 2300	1,863	847	4,912	7,961	508	1,355				17,446
42208 - Meter-Amer Al AL 1400	4,906	4,361	14,718	4,906	273	409		136		29,708
42207 - Meter-Amer Al AL 1000	10,860	11,818	37,372	7,666	958		319	319		69,313
42206 - Meter-Amer Al AL 800	103,227	135,263	255,931	37,731	8,187	2,492		356		543,187
42205 - Meter-Amer Al AL 425	172,891	91,074	58,304	6,064	1,383	213				329,930
42204 - Meter-Amer Al AL 250	936,294	31,446	3,258	412	62			21		971,494
42203 - Meter-Amer Al AC 250	1,804,175	73,715	6,107	865	297	27				1,885,185
42011 - Meter-Tin Cleve 15L	530									530
Grand Total	**$ 7,316,237**	**$ 950,361**	**$ 1,276,986**	**$ 933,314**	**$ 81,941**	**$ 246,870**	**$ 45,896**	**$ 50,058**	**$ 10,959**	**$ 10,912,623**

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-08:

Please provide the Company's rate design models and cost of service study on an IBM PC-compatible computer disk in Lotus 1-2-3-or Quattro format. If the models consist of more than one file, please include information on all files on the disk and what they contain. If not available in Lotus 1-2-3 or Quattro format, please provide in ASCII format.

Response:

Please see Exhibit D (Cost of Service Study - Fully Projected Future Test Year) provided in electronic format on USB flash drive.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-09:

Please provide a copy of the Company's current customer extension policy. Provide a representative sample of the analyses conducted by the Company when deciding whether service to a new customer qualifies under the Company's customer extension policy.

Response:

The Company's current customer extension policy is found on Pages 10 through 17 of Pa. P.U.C. No. 9 (included in this filing as part of National Fuel Gas Exhibit F – Current Tariff and as Attachment SDR-COS-09). The tariff language describes the methodology for evaluating whether service to a new customer qualifies under the current policy. The Company's services application ("PFI") calculates projected annual revenues and determines the justified Company investment based on the factors outlined in the tariff. Attachment SDR-COS-09 includes screenshots from PFI for a residential and non-residential example.

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED

1. RULES AND REGULATIONS

The customer's application for service, the Pennsylvania Public Utility Code and the rules and regulations promulgated by the Pennsylvania Public Utility Commission, as amended from time to time, and the rules and regulations contained herein are a part of the contract with each Customer, and each Customer agrees to be bound thereby.

2. APPLICATIONS FOR SERVICE

The Company may require any applicant for service to sign an application. Regardless of the manner in which an application is made, the acceptance of such application by the Company shall result in a contract service governed by Rule 1.

3. DETERMINATION OF COMPANY INVESTMENT FOR UPGRADE/EXTENSION OF FACILITIES

A. Maximum Company Investment Level

The Company investment for upgrade/extension of facilities for a firm gas customer shall be limited to an amount determined as follows:

Maximum Company Investment = Additional Annual Revenues x Justified Company Investment per Dollar of Additional Annual Revenue

B. Determination of Additional Annual Revenues

The Additional Annual Revenues are calculated as follows:

(1) The Company will estimate the customer's projected firm annual volumes as follows:

(a) Residential

For guideline purposes, the Company shall use annual gas consumption figures for gas space heating and for various gas appliances as shown below (These figures are based on current insulation standards as well as 92% efficient furnaces): (C)

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

3. DETERMINATION OF COMPANY INVESTMENT FOR UPGRADE/EXTENSION OF FACILITIES (Cont'd)

Gas Space Heating:
Single Family Home - [(square footage x .029) – 5.4] Mcf
Apartment/Condominium - [(square footage x .024) + 3.14] Mcf
Manufactured Home - [(square footage x .0267) + 6.98] Mcf

Gas Appliances:

Gas Water Heater – 20.4 Mcf
Gas Dryer – 3.6 Mcf
Gas Range – 7.6 Mcf
Other Gas Appliances – Determined by the Company on a case-by-case basis.

(b) Commercial or Public Authority: Industrial

The Company shall estimate projected firm annual volumes on a case-by-case basis.

(2) This annual volume is then distributed into 12 monthly amounts based on an average distribution in the appropriate revenue classification. (Alternatively, the customer's annual usage estimate may be distributed according to his own historic or projected monthly load profile pursuant to the Company's review and approval.)

(3) The appropriate rate schedule is applied to each monthly volume, and the results are added to produce annual gross revenues.

(4) For each monthly volume the costs shall be determined for the portion of monthly gross revenues for recovery of purchased gas costs pursuant to applicable provisions of Rider A to this tariff and the applicable rate schedule. (C)

The portion of monthly gross revenues for recovery of Purchased Gas Costs and Transition Costs for each month shall be added together to produce annual revenues for recovery of Purchased Gas Costs and Transition Costs.

(5) The amount calculated under item (4) above, shall be subtracted from the amount calculated under item (3) above.

(6) Additional annual revenues resulting from the upgrade/extension shall be determined by reducing the annual revenues for recovery of non-gas costs as calculated in (5) above, by the customer's currently generated annual revenues for recovery of non-gas costs, if any, as determined by the Company.

(C) Indicates Change
(D) Indicates Decrease
(I) Indicates Increase

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

3. DETERMINATION OF COMPANY INVESTMENT FOR UPGRADE/EXTENSION OF FACILITIES (Cont'd)

C. Determination of Justified Company Investment Per Dollar of Additional Annual Revenue

(1) Residential

The Justified Company Investment Per Dollar of Additional Annual Revenue for residential customers is $6.93. (I)

(2) Commercial and Public Authority; Industrial

The Justified Company Investment Per Dollar of Additional Annual Revenue for commercial, public authority or industrial customers shall be selected from the table below based upon the projected term of use by the customer of the new or upgraded facilities.

Projected Term of Use of New/Upgraded Facilities (Years)	Justified Company Investment Per Dollar of Additional Annual Revenue
1	$ 0.63
2	1.21
3	1.76
4	2.27
5	2.74
6	3.18
7	3.59
8	3.97
9	4.32
10	4.65
Greater than 10	6.93

(I)

Because the term of use has a substantial effect on the determination of the Justified Company Investment Per Dollar of Additional Annual Revenue, the Company may require a letter of intent from commercial, public authority and industrial customers projecting the term of use of the new or upgraded extension of facilities being requested.

The Company reserves the right to require a guaranteed revenue contract if the customer projects a term of use of the new or upgraded facilities in excess of 10 years or if the customer does not demonstrate that the customer's term of use is reasonable.

(D) Indicates Decrease

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

3. DETERMINATION OF COMPANY INVESTMENT FOR UPGRADE/EXTENSION OF FACILITIES (Cont'd)

Additionally, the Company reserves the right to require a guaranteed revenue contract from a commercial, public authority or industrial customer if any of the following conditions exist:

(1) The investment is for a dual fuel or partially dual fueled facility;

(2) The Company determines that a customer's financial status does not demonstrate that the customer will be able to pay bills for the projected term of use of the facilities; or

(3) The actual investment by the Company is greater than $50,000.

(3) Recomputation

The Company may recompute, modify, alter or amend the foregoing Justified Company Investment Per Dollar of Additional Annual Revenue amounts as the Company may deem necessary or convenient in the conduct of its business, provided, however, that such recomputation, modification, alteration or amendment shall not become effective unless and until included in this tariff. (C)

D. Application of Maximum Company Investment

The Maximum Company Investment as determined above shall be applied, first, to the installed meter cost, if any, and then will be applied towards any mainline and/or service line extension, service connection, and/or the upgrade of any of the Company's facilities to accommodate increased volumes of sales or transportation. However, if the Maximum Company Investment is less than the installed meter cost, Company will provide and install the meter at no cost to the Customer.

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

4. UPGRADE/EXTENSION OF FACILITIES

A. Residential

Whenever the owner or occupant of any property eligible for service as a residential customer makes a written application for service to the Company, and the Company has authority to render service to said applicant, the Company shall extend its facilities so as to serve said property or new residential development, provided that the applicant shall first have executed an agreement to pay to the company the rate charged under the appropriate service classification and to contribute to the cost of extending facilities, an amount equal to the difference between the total cost of construction of facilities less the Company's Maximum Investment (as calculated in Rule No. 3, above).

Income taxes, if any, paid with respect to the Contribution will be recorded in a deferred account and such taxes, less the income tax effect of depreciation received with respect to the property constructed with the Contribution, will be included in the Company's rate base in subsequent rate case proceedings.

B. Commercial or Public Authority; Industrial

Whenever the owner or occupant of any property eligible for service as a Commercial or Public Authority customer, or as an Industrial customer, makes a written application for service to the Company, and the Company has authority to render service to said applicant, the Company shall extend its system so as to serve said property, provided said applicant shall first have executed an agreement to pay to the Company the rates charged under the appropriate service classification and to contribute to the cost of extending facilities, an amount equal to the difference between the total cost of construction of facilities less the Company's Maximum Investment (as calculated in Rule No. 3, above).

Income taxes, if any, paid with respect to the Contribution will be recorded in a deferred account and such taxes, less the income tax effect of depreciation received with respect to the property constructed with the Contribution, will be included in the Company's rate base in subsequent rate case proceedings.

The Company's Maximum Investment for Commercial or Public Authority and Industrial customers shall equal the Maximum Company Investment as calculated in Rule No. 3 above; provided, however, that, in the event that the Company reasonably believes that the Company's installation of facilities will be completed substantially in advance of date that the Customer's use will equal projected annual volumes used to calculate the Maximum Company Investment as calculated in Rule No. 3 above, the Company may discount the Maximum Company

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

4. UPGRADE/EXTENSION OF FACILITIES (Cont'd)

Investment as calculated in Rule No. 3 above to present value based upon the Company's most recent Commission-approved fair rate of return. (C)

C. Developer/Builder - Residential

Whenever the Developer/Builder of a residential property eligible for service makes a written application for service to the Company, and the Company has authority to render service to the property to be developed, the Company shall extend its system to serve said property, provided that, if the cost to extend the facilities exceeds the Maximum Company Investment, as calculated below, the Developer/Builder shall have entered into an agreement to contribute to the cost of extending facilities. (C) (C) (C)

The Maximum Company Investment for extensions involving a Developer/Builder shall be calculated as follows:

(1) The Developer/Builder shall provide a reasonable schedule of unit completion within the property to be developed;

(2) The Maximum Company Investment shall be calculated (as provided in Section 3) separately based on the number of units scheduled to be completed:

(a) within twelve months from the date of the estimated completion of construction of the new facilities; and

(b) during each successive twelve month period following the date of the estimated completion of construction of the new facilities.

(3) For all units not scheduled for completion within twelve months from the estimated date of completion of the construction of the new facilities, the Maximum Company Investment, as calculated above, shall be discounted to present value at the projected date of the completion of Company installed facilities using the Company's most recent Commission-approved fair rate of return.

(4) The sum of the discounted Maximum Company Investment for units to be installed more than twelve months after construction of Company facilities and the Maximum Company Investment for units scheduled for completion within twelve months of the estimated date of completion of construction of Company facilities shall equal the total Maximum Company Investment for the extension.

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

4. UPGRADE/EXTENSION OF FACILITIES (Cont'd)

The Developer/Builder shall contribute to the cost of extending facilities, an amount equal to the difference between the total cost of construction of facilities less the Maximum Company Investment (as calculated above).

Income taxes, if any, paid with respect to the Contribution will be recorded in a deferred account and such taxes, less the income tax effect of depreciation received with respect to the property constructed with the Contribution, will be included in the Company's rate base in subsequent rate case proceedings.

In the event that the Developer/Builder does not achieve the projected annual completion rate, the Maximum Company Investment and the amount to be contributed will be recalculated, in the same manner stated above, based upon actual units completed. If the recalculated amount to be contributed is greater than the previously calculated amount to be contributed, the Developer/Builder will be required to pay such difference to the Company; provided, however, that no amount will be required to be paid if the recalculated amount to be contributed exceeds the Company's actual cost of construction less the recalculated Maximum Company Investment.

C1. Developer/Builder Commercial or Industrial

Whenever the Developer/Builder of a commercial or industrial property eligible for service makes a written application for service to the Company, and the Company has authority to render service to the property to be developed, the Company shall extend its system to serve said property, provided that, if the cost to extend the facilities exceeds the Maximum Company Investment, as calculated below, the Developer/Builder shall have entered into an agreement to contribute to the cost of extending facilities.

The Maximum Company Investment for extensions involving a Developer/Builder shall be calculated as follows:

(1) The Developer/Builder shall provide a reasonable schedule of customer attachments and projected additional annual revenues from volumes to be transported by or purchased from the Company and consumed by the attaching customers;

(2) The Maximum Company Investment shall be calculated (as provided in Section 3) separately based on the historical and projected additional annual revenues from volumes to be transported by or purchased from the Company and consumed by the attaching customers: (C)

(a) within twelve months from the date of the estimated completion of construction of the new facilities; and

(b) during each successive twelve month period following the date of the estimated completion of construction of the new facilities.

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

4. UPGRADE/EXTENSION OF FACILITIES (Cont'd)

(3) For all customer attachments not scheduled for completion within twelve months from the estimated date of completion of the construction of the new facilities, the Maximum Company Investment, as calculated above, shall be discounted to present value at the projected date of the completion of Company installed facilities using the Company's most recent Commission-approved fair rate of return. (C)

(4) The sum of the discounted Maximum Company Investment for customers to be attached more than twelve months after construction of Company facilities and the Maximum Company Investment for customer attachments scheduled for completion within twelve months of the estimated date of completion of construction of Company facilities shall equal the total Maximum Company Investment for the extension.

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

4. UPGRADE/EXTENSION OF FACILITIES (Cont'd)

The Developer/Builder shall contribute to the cost of extending facilities, an amount equal to the difference between the total cost of construction of facilities less the Maximum Company Investment (as calculated above).

Income taxes, if any, paid with respect to the Contribution will be recorded in a deferred account and such taxes, less the income tax effect of depreciation received with respect to the property constructed with the Contribution, will be included in the Company's rate base in subsequent rate case proceedings.

In the event that the Developer/Builder does not achieve the projected annual completion rate, the Maximum Company Investment and the amount to be contributed will be recalculated, in the same manner stated above, based upon actual additional annual revenues from volumes transported by or purchased from the Company and consumed by the attaching customers during the 60-month period following completion of the extension and the projected additional annual revenues from volumes to be transported by or purchased from the Company and consumed by the customers attached as of the last day of such 60-month period. If the recalculated amount to be contributed is greater than the previously calculated amount to be contributed, the Developer/Builder will be required to pay such difference to the Company; provided, however, that no amount will be required to be paid if the recalculated amount to be contributed exceeds the Company's actual cost of construction less the recalculated Maximum Company Investment.

D. Upgrade

The Company's investment for the upgrade of facilities shall be subject to the formula described in Rule No. 3. An upgrade is required when the customer needs dictate increasing, decreasing or otherwise changing the current service line, main line or meter size for the increased, decreased or otherwise changed volume or pressure requirements or when the customer requests installation of an excess flow valve or natural gas related equipment or facilities not otherwise required by regulation and the Company has deemed such installation appropriate. (C)

E. Advance Payment and Construction

Construction of any extension or installation of excess flow valves or natural gas related equipment or facilities not otherwise required by regulation will not be undertaken until the amount of the applicant's contribution has been paid to the Company by the applicant. In the case of an excess flow valve or natural gas related equipment or facilities not otherwise required by regulation, the amount of the applicant's contribution will be determined based upon the Company's cost to install such equipment. The actual construction of the extension shall be scheduled at the Company's discretion. (C) (C)

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

4. UPGRADE/EXTENSION OF FACILITIES (Cont'd)

F. Refunds of Customer Investment

Any customer attaching to a facility extended/upgraded within five (5) years of completion thereof will be required to contribute to the cost of the extension/upgrade in accordance with Rules 3 and 4. In the event a new customer attaches to an extension/upgrade of the Company's facilities paid for by a customer or a developer/builder, within five (5) years of the date of completion thereof, a pro rata refund will be made to customers or developer/builder who were charged for such extension. In the alternative, the customer or builder/developer and Distribution may mutually agree in writing that the refund, if any, shall equal the Company's Maximum Company Investment for the attaching customer less the Company's actual attachment cost of construction. An annual review of such extensions is made on the anniversary date of completion thereof, during said five (5) years, and any refunds due are made at that time except for extensions for a developer/builder of commercial or industrial property which shall be reviewed at the end of year five (5) and any refunds due will be made at that time. No refunds will be paid for attachments occurring more than five (5) years after the completion date and in no case will the aggregate amount of refunds to a customer or developer/builder exceed the amount which the customer or developer/builder paid for the mainline extension/upgrade. (C)

5. MAINTENANCE OF FACILITIES

After initial installation of facilities has been made, pursuant to Rule Nos. 3 and 4, above, all facilities including mains, customer service lines (i.e., the portion of the service line from the outlet of the Company's service stop cock to the inlet of the meter) and Company service lines (i.e. the portion of the service line from the gas main to and including the curb box and service stop cock), shall be maintained, replaced or renewed, as required, at the expense of the Company.

5A. SPECIAL UTILITY SERVICES

The provisions of Rules 3 and 4 do not apply to applications for special utility service. "Special utility service" shall include (a) a request for utility service when the applicant has an installed alternative fuel capability, including service from a natural gas well; (b) a request for utility service when the applicant is already receiving natural gas service from another Pennsylvania public utility; (c) a request for utility service from an applicant located in an area in which another natural gas utility is authorized to serve the applicant; (d) a request for utility service by an applicant who was the owner or ratepayer of record for the premises at the time the Company last provided service to the premises; (e) any request for service by an applicant who, in the Company's view, is unlikely to remain on the Company's system for a sufficient period of time to justify the extension. Applications for special utility service shall be resolved on a case-by-case basis through negotiations between the applicant and the company.

(C) Indicates Change

Application Information | Requested Dates | Dates | Billing Information | Meter Access Information | AGR / LJI | Comments

Application ID: [redacted] [redacted]
Type: **Residential**
Status: **Completed**
Stage: **Completed**
Status Date: **08/27/2025**
Dept. ID: **311**
Town: **MCE0**
Grid: **ER1**

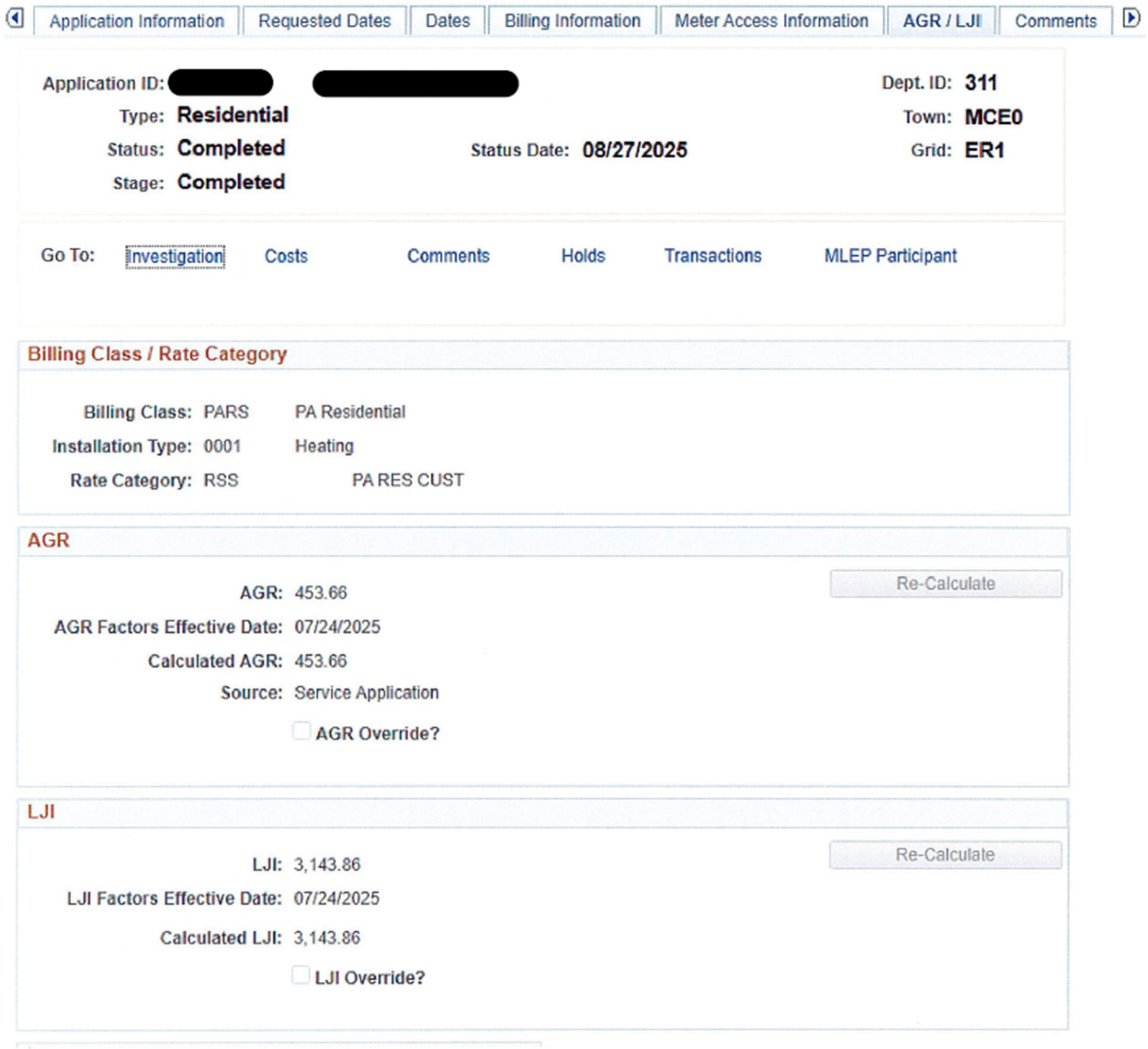
Go To: Investigation | Costs | Comments | Holds | Transactions | MLEP Participant

Service Application Information

Received Date: 07/24/2025
New/Existing Building: Existing
Subdivision Name:
Existing Service?: No
Existing Service Line Number:
Fuel Conversion?: No
Gas Well on Premise?: No
National Fuel Only Heat Source?: Yes
Previously Abandoned Service?: No
Owner at the Time?: No
Load Factor: New Load - Conversion
Residence Type: Single
Number of Units: 1
Number of Meters: 1
Total Square Footage: 2000

Intended Gas Usage

	Gas Usage Type	Count	BTU Input / Hour	Other Type Description
☑	Heat	1	90000	
☐	Water Heater – Standard			
☑	Water Heater – Tankless	1	199000	
☑	Cooking	1	35000	
☑	Clothes Drying	1	30000	
☐	Generator			
☐	Pool / Spa Heater			
☑	Indoor Fireplace	1	30000	
☐	Garage Heater			
☑	Gas Grill	1	30000	
☐	Gas Space Heater			
☐	Patio / Fireplace Heater			
☐	Gas Light			
☐	Other			



Application Information | Requested Dates | Dates | Billing Information | Meter Access Information | AGR / LJI | Comments

Application ID: [redacted] [redacted]
Type: **Residential**
Status: **Completed**
Stage: **Completed**
Status Date: **08/27/2025**
Dept. ID: **311**
Town: **MCE0**
Grid: **ER1**

Go To: Investigation | Costs | Comments | Holds | Transactions | MLEP Participant

Billing Class / Rate Category

Billing Class:	PARS	PA Residential
Installation Type:	0001	Heating
Rate Category:	RSS	PA RES CUST

AGR

Re-Calculate

AGR:	453.66
AGR Factors Effective Date:	07/24/2025
Calculated AGR:	453.66
Source:	Service Application

☐ AGR Override?

LJI

Re-Calculate

LJI:	3,143.86
LJI Factors Effective Date:	07/24/2025
Calculated LJI:	3,143.86

☐ LJI Override?

Billing Information | Meter Access Information | Equipment | Annual Consumption | Security Deposit | AGR / LJI | Comments

Application ID: [redacted] [redacted]

Type: **Non-residential**
Status: **Completed**
Stage: **Completed**
Status Date: **09/11/2025**
Dept. ID: **311**
Town: **ERE9**
Grid: **ER7**

Go To: Investigation Costs Comments Holds Transactions MLEP Participant

Equipment

Existing Equipment

Find | View All | First 1-3 of 3 Last

Type	Description	Other Type Description	Number of Units	Total BTU/Hour	Meter Group	Total CFH
01	Water Heaters		5	225000	1	225
02	Space Heating Furnaces		5	500000	1	500
09	Food Preparation Equipment		4	140000	1	140
				Total BTU/Hour:	865000	Total CFH: 865

New/Added Equipment

Find | View All | First 1-2 of 2 Last

Type	Description	Other Type Description	Number of Units	Total BTU/Hour	Meter Group	Total CFH
01	Water Heaters		1	45000	1	45
02	Space Heating Furnaces		1	100000	1	100
				Total BTU/Hour:	145000	Total CFH: 145
				Grand Total:	1010000	Grand Total: 1010

Alternate Fuel

Alternate Fuel Source Available?: No
Electric Heat Pumps?: No
Backup Heating Equipment?: No

Billing Information | Meter Access Information | Equipment | **Annual Consumption** | Security Deposit | AGR / LJI | Comments

Application ID: [redacted] [redacted]

Type: **Non-residential**

Status: **Completed**

Status Date: **09/11/2025**

Stage: **Completed**

Dept. ID: **311**

Town: **ERE9**

Grid: **ER7**

Go To: Investigation | Costs | Comments | Holds | Transactions | MLEP Participant

Annual Consumption

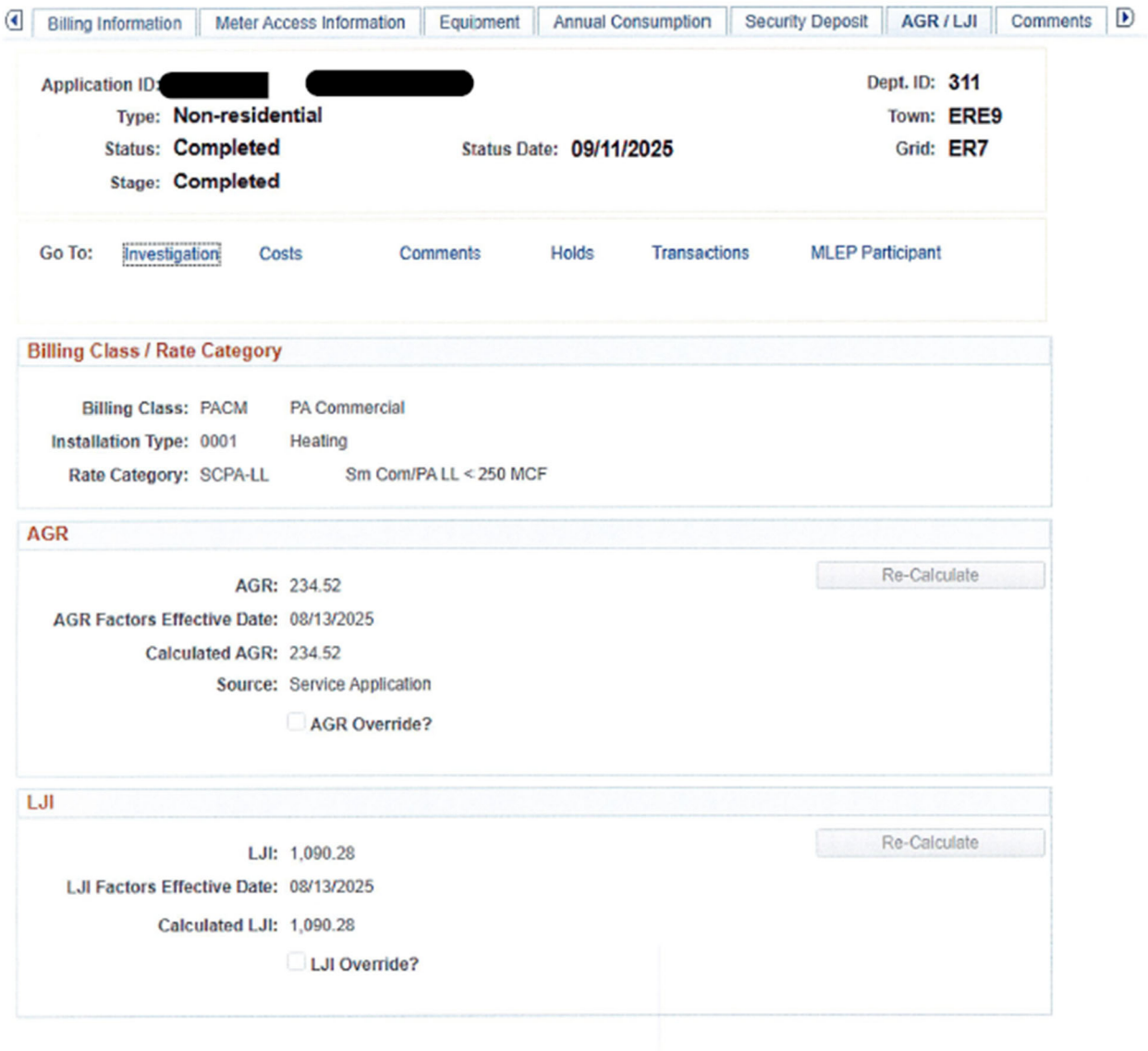
Meter Groups

Meter Group Number: 1

Annual Consumption

Heat / Process	Calculated Present (MCF)	Calculated Additional (MCF)	Calculated Total (MCF)	Override?	Override Present (MCF)	Override Additional (MCF)	Present Consumption (MCF)	Additional Consumption (MCF)	Total Consumption (MCF)
Heat	350	70	420	☐			350	70	420
Process	256	32	288	☐			256	32	288

	Calculated Present (MCF)	Calculated Additional (MCF)	Calculated Total (MCF)				Present Consumption (MCF)	Additional Consumption (MCF)	Total Consumption (MCF)
Total Heat	350	70	420				350	70	420
Total Process	256	32	288				256	32	288



Billing Information | Meter Access Information | Equipment | Annual Consumption | Security Deposit | AGR / LJI | Comments

Application ID: [redacted]
Type: Non-residential
Status: Completed
Stage: Completed
Status Date: 09/11/2025
Dept. ID: 311
Town: ERE9
Grid: ER7

Go To: Investigation | Costs | Comments | Holds | Transactions | MLEP Participant

Billing Class / Rate Category

Billing Class: PACM PA Commercial
Installation Type: 0001 Heating
Rate Category: SCPA-LL Sm Com/PA LL < 250 MCF

AGR

Re-Calculate

AGR: 234.52
AGR Factors Effective Date: 08/13/2025
Calculated AGR: 234.52
Source: Service Application
AGR Override?

LJI

Re-Calculate

LJI: 1,090.28
LJI Factors Effective Date: 08/13/2025
Calculated LJI: 1,090.28
LJI Override?

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-10:

Please provide a detailed supply and requirement schedule for the Company's three most recent annual peak days and for design day. The schedules should include deliveries by source and requirements by rate schedule. Identify sources and requirements for transportation customers separately. Also include the Company's daily sendout sheet for each peak day and applicable weather data.

Response:

The Company is providing CONFIDENTIAL SDR-COS-10 (Pages 2 through 6 of this response) in a separately sealed envelope that is marked "CONFIDENTIAL". The Company hereby requests that the content of such envelope be placed in the Commission's NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such CONFIDENTIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.

Confidential pages:
Page 2 contains the supply and requirement schedule for the three most recent annual peak days for National Fuel Gas Distribution Corporation.
The requirements are segregated into sales and transportation service in section 1 (Firm Retails Sales and Transportation Requirements). The deliveries to the Company's system are identified by source in section 2 (Deliveries to the Company (Sources of Supply)) which includes deliveries by the Company from pipeline and storage for retail customers and deliveries by third party suppliers for transportation customers from local production and NFGSC pipeline. Weather data is included in section 3. Pages 3 through 5 are the Daily Gas Throughput Summary Reports for the most recent three peak days. Page 6 is the supply and requirements schedule for the Company's 2025-2026 design day.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-11:

Please provide copies of the Company's daily sendout sheets for November through March of the most recent heating season.

Response:

See attached for the Company's November 1, 2024 – March 31, 2025 daily sendout sheets (Daily Gas Throughput Summary Report"). Please note pages 2-152 are CONFIDENTIAL. The Company is providing pages 2-152 in a separately sealed envelope that is marked "CONFIDENTIAL." The Company hereby requests that the content of such envelope be placed in the Commission's NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such CONFIDENTIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-12:

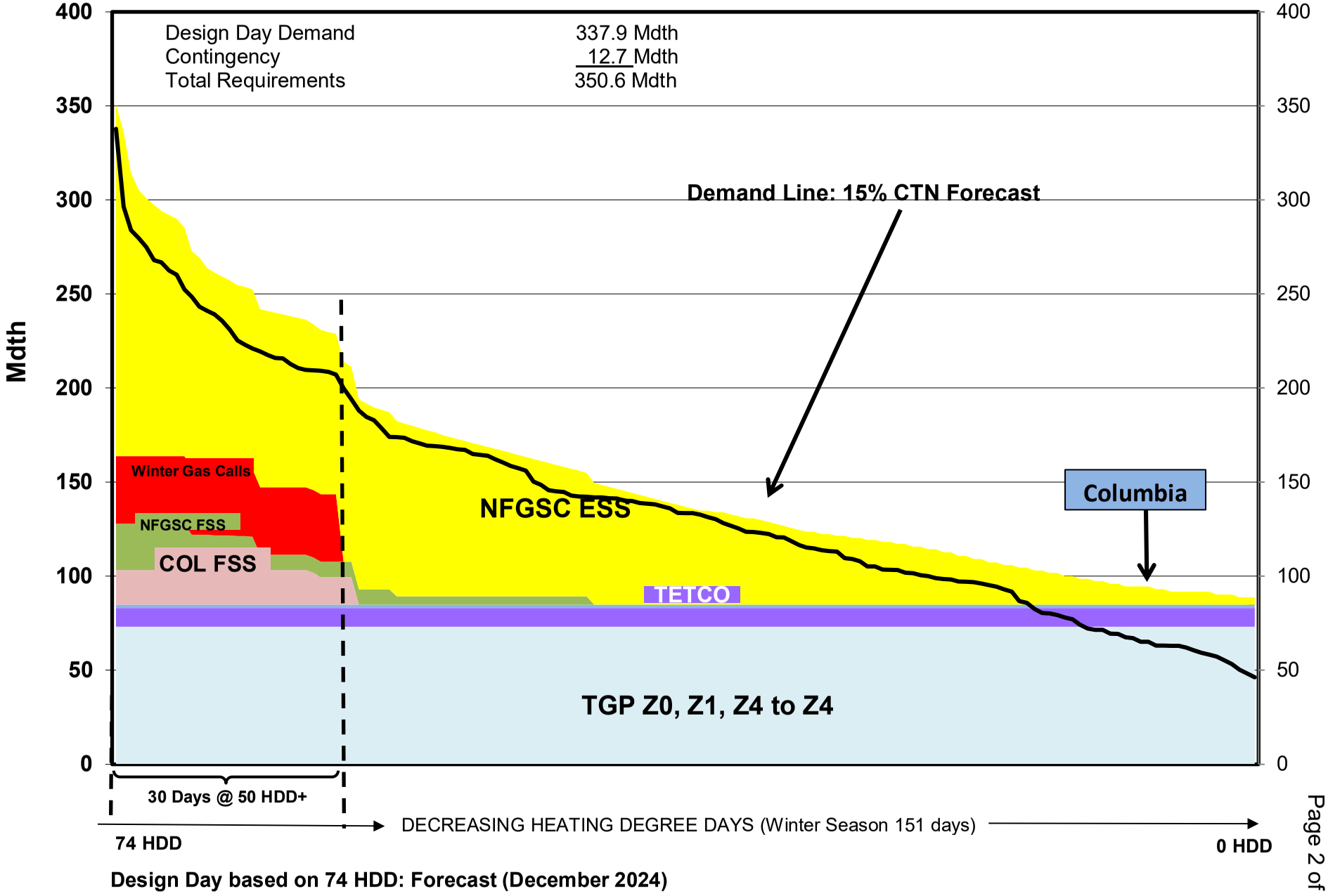
Please provide a copy of the load duration curve used by the Company for capacity planning purposes. Please also identify the numerical data points shown for each day on the curve.

Response:

Please see Page 2 of the attached for the Company's Load duration curve for winter 2025 through 2026. The Company's load duration curve illustrates the utilization of its contracted firm transportation and storage capacity and winter gas call to serve the demand for a projected design day and 15% colder than normal "CTN" forecasted winter. Pages 3-4 include the numerical data points for each day of the curve.

The abbreviations referenced in pages 2 through 4 are as follows:
Columbia Gas Transmission, LLC – "COL"
Texas Eastern Transmission, LP – "TETCO"
National Fuel Gas Supply Corporation – "NFGSC"
Tennessee Gas Pipeline Company – "TGP"
Enhanced Storage Service – "ESS"
Firm Storage Service – "FSS"

National Fuel Gas Distribution Corporation - Pennsylvania
2025-2026 Load Duration Curve



Design Day based on 74 HDD: Forecast (December 2024)

Question No. COS-12
Respondent: Cej
Page 2 of 4

Load Curve data

Pennsylvania Distribution Core & SATS Customers
15% CTN Market Forecast - Proposed Assets

SUPPLY FUEL
1.09%
98.9100%

TETCO	COL	TGP	Replacement Supply (30-Day)	NFGSC FSS 19-Day	NFGSC FSS 63-Day	NFGSC FSS	NFGSC ESS-1	COL FSS	15% CTN Demand Line
9.9	1.7	73.2	35.9	10.7	14.0	24.7	187.0	18.4	329.0
9.9	1.7	73.2	35.9	10.7	14.0	24.7	172.3	18.4	296.4
9.9	1.7	73.2	35.9	10.7	14.0	24.7	150.6	18.4	283.9
9.9	1.7	73.2	35.9	10.7	14.0	24.7	141.5	18.4	279.7
9.9	1.7	73.2	35.9	10.7	14.0	24.7	137.0	18.4	274.9
9.9	1.7	73.2	35.9	10.7	14.0	24.7	133.6	18.4	267.9
9.9	1.7	73.2	35.9	10.7	14.0	24.7	130.3	18.4	266.8
9.9	1.7	73.2	35.9	10.7	14.0	24.7	128.2	18.4	262.5
9.9	1.7	73.2	35.9	10.7	14.0	24.7	126.1	18.4	260.2
9.9	1.7	73.2	35.9	10.7	14.0	24.7	121.6	18.4	252.4
9.9	1.7	73.2	35.9	10.7	8.1	18.8	114.8	18.4	248.5
9.9	1.7	73.2	35.9	10.7	8.1	18.8	111.5	18.4	243.2
9.9	1.7	73.2	35.9	10.7	8.1	18.8	105.9	18.4	241.0
9.9	1.7	73.2	35.9	10.3	8.1	18.4	103.8	18.4	239.2
9.9	1.7	73.2	35.9	10.3	8.1	18.4	101.7	18.4	235.7
9.9	1.7	73.2	35.9	10.3	8.1	18.4	99.6	18.4	231.0
9.9	1.7	73.2	35.9	9.9	8.1	18.0	97.5	18.4	225.3
9.9	1.7	73.2	35.9	9.9	8.1	18.0	96.6	18.4	223.1
9.9	1.7	73.2	35.9	9.6	8.1	17.7	95.6	18.4	221.0
9.9	1.7	73.2	35.9	-	8.1	8.1	94.7	18.4	219.4
9.9	1.7	73.2	35.9	-	8.1	8.1	93.7	18.4	217.5
9.9	1.7	73.2	35.9	-	8.1	8.1	92.8	18.4	215.9
9.9	1.7	73.2	35.9	-	8.1	8.1	91.9	18.4	215.7
9.9	1.7	73.2	35.9	-	8.1	8.1	90.9	18.4	212.7
9.9	1.7	73.2	35.9	-	8.1	8.1	90.0	18.4	210.6
9.9	1.7	73.2	35.9	-	8.1	8.1	89.1	18.4	209.6
9.9	1.7	73.2	35.9	-	8.1	8.1	88.1	17.0	209.4
9.9	1.7	73.2	35.9	-	8.1	8.1	87.2	14.7	209.1
9.9	1.7	73.2	35.9	-	8.1	8.1	86.2	14.7	208.6
9.9	1.7	73.2	35.9	-	8.1	8.1	85.3	14.7	207.2
9.9	1.7	73.2	-	-	8.1	8.1	106.4	14.7	199.8
9.9	1.7	73.2	-	-	8.1	8.1	103.7	14.7	194.0
9.9	1.7	73.2	-	-	8.1	8.1	101.0	-	188.0
9.9	1.7	73.2	-	-	8.1	8.1	98.9	-	184.6
9.9	1.7	73.2	-	-	8.1	8.1	96.8	-	182.8
9.9	1.7	73.2	-	-	8.1	8.1	95.4	-	178.6
9.9	1.7	73.2	-	-	8.1	8.1	94.3	-	174.0
9.9	1.7	73.2	-	-	4.4	4.4	93.3	-	173.8
9.9	1.7	73.2	-	-	4.4	4.4	91.8	-	173.5
9.9	1.7	73.2	-	-	4.4	4.4	90.8	-	171.7
9.9	1.7	73.2	-	-	4.4	4.4	89.4	-	170.5
9.9	1.7	73.2	-	-	4.4	4.4	88.3	-	169.3
9.9	1.7	73.2	-	-	4.4	4.4	87.3	-	169.1
9.9	1.7	73.2	-	-	4.4	4.4	85.8	-	168.8
9.9	1.7	73.2	-	-	4.4	4.4	84.7	-	168.2
9.9	1.7	73.2	-	-	4.4	4.4	83.6	-	167.4
9.9	1.7	73.2	-	-	4.4	4.4	82.6	-	167.1
9.9	1.7	73.2	-	-	4.4	4.4	81.5	-	164.9
9.9	1.7	73.2	-	-	4.4	4.4	80.5	-	164.4
9.9	1.7	73.2	-	-	4.4	4.4	79.4	-	164.0
9.9	1.7	73.2	-	-	4.4	4.4	78.4	-	162.1
9.9	1.7	73.2	-	-	4.4	4.4	77.3	-	160.3
9.9	1.7	73.2	-	-	4.4	4.4	76.3	-	158.6
9.9	1.7	73.2	-	-	4.4	4.4	75.2	-	157.4
9.9	1.7	73.2	-	-	4.4	4.4	74.2	-	156.0
9.9	1.7	73.2	-	-	4.4	4.4	73.1	-	150.2
9.9	1.7	73.2	-	-	4.4	4.4	72.0	-	148.5
9.9	1.7	73.2	-	-	4.4	4.4	71.0	-	145.6
9.9	1.7	73.2	-	-	4.4	4.4	69.9	-	145.1
9.9	1.7	73.2	-	-	4.4	4.4	68.9	-	144.7
9.9	1.7	73.2	-	-	4.4	4.4	67.8	-	142.8
9.9	1.7	73.2	-	-	4.4	4.4	66.8	-	142.3
9.9	1.7	73.2	-	-	4.4	4.4	65.7	-	142.2
9.9	1.7	73.2	-	-	-	-	64.7	-	141.8
9.9	1.7	73.2	-	-	-	-	63.6	-	141.8
9.9	1.7	73.2	-	-	-	-	62.6	-	141.4
9.9	1.7	73.2	-	-	-	-	61.5	-	141.3
9.9	1.7	73.2	-	-	-	-	60.5	-	140.1
9.9	1.7	73.2	-	-	-	-	59.4	-	139.9
9.9	1.7	73.2	-	-	-	-	58.3	-	138.8
9.9	1.7	73.2	-	-	-	-	57.3	-	138.5
9.9	1.7	73.2	-	-	-	-	56.2	-	138.2
9.9	1.7	73.2	-	-	-	-	55.2	-	137.1
9.9	1.7	73.2	-	-	-	-	54.1	-	135.9
9.9	1.7	73.2	-	-	-	-	53.1	-	133.6
9.9	1.7	73.2	-	-	-	-	52.0	-	133.5
9.9	1.7	73.2	-	-	-	-	51.0	-	133.5
9.9	1.7	73.2	-	-	-	-	50.0	-	132.6
9.9	1.7	73.2	-	-	-	-	50.0	-	131.3
9.9	1.7	73.2	-	-	-	-	49.1	-	130.3
9.9	1.7	73.2	-	-	-	-	49.1	-	128.3
9.9	1.7	73.2	-	-	-	-	48.0	-	126.7
9.9	1.7	73.2	-	-	-	-	47.0	-	125.3

Load Curve data

Pennsylvania Distribution Core & SATS Customers
15% CTN Market Forecast - Proposed Assets

SUPPLY FUEL
1.09%
98.9100%

TETCO	COL	TGP	Replacement Supply (30-Day)	NFGSC FSS 19-Day	NFGSC FSS 63-Day	NFGSC FSS	NFGSC ESS-1	COL FSS	15% CTN Demand Line
9.9	1.7	73.2	-	-	-	-	45.9	-	123.6
9.9	1.7	73.2	-	-	-	-	45.9	-	123.4
9.9	1.7	73.2	-	-	-	-	44.9	-	123.0
9.9	1.7	73.2	-	-	-	-	43.9	-	122.3
9.9	1.7	73.2	-	-	-	-	42.9	-	120.7
9.9	1.7	73.2	-	-	-	-	41.8	-	120.5
9.9	1.7	73.2	-	-	-	-	40.8	-	118.5
9.9	1.7	73.2	-	-	-	-	39.7	-	116.5
9.9	1.7	73.2	-	-	-	-	38.7	-	115.1
9.9	1.7	73.2	-	-	-	-	38.7	-	114.7
9.9	1.7	73.2	-	-	-	-	37.6	-	113.7
9.9	1.7	73.2	-	-	-	-	37.6	-	113.3
9.9	1.7	73.2	-	-	-	-	36.6	-	113.0
9.9	1.7	73.2	-	-	-	-	36.6	-	109.5
9.9	1.7	73.2	-	-	-	-	35.5	-	109.0
9.9	1.7	73.2	-	-	-	-	35.5	-	107.9
9.9	1.7	73.2	-	-	-	-	34.4	-	105.2
9.9	1.7	73.2	-	-	-	-	34.4	-	105.1
9.9	1.7	73.2	-	-	-	-	33.4	-	103.5
9.9	1.7	73.2	-	-	-	-	33.4	-	103.3
9.9	1.7	73.2	-	-	-	-	32.3	-	103.2
9.9	1.7	73.2	-	-	-	-	32.3	-	101.7
9.9	1.7	73.2	-	-	-	-	30.9	-	101.5
9.9	1.7	73.2	-	-	-	-	30.9	-	100.5
9.9	1.7	73.2	-	-	-	-	29.5	-	99.9
9.9	1.7	73.2	-	-	-	-	29.5	-	98.9
9.9	1.7	73.2	-	-	-	-	27.8	-	98.4
9.9	1.7	73.2	-	-	-	-	27.8	-	98.2
9.9	1.7	73.2	-	-	-	-	26.0	-	97.2
9.9	1.7	73.2	-	-	-	-	26.0	-	97.0
9.9	1.7	73.2	-	-	-	-	24.3	-	96.7
9.9	1.7	73.2	-	-	-	-	24.3	-	96.1
9.9	1.7	73.2	-	-	-	-	22.5	-	95.2
9.9	1.7	73.2	-	-	-	-	22.5	-	94.4
9.9	1.7	73.2	-	-	-	-	21.1	-	93.0
9.9	1.7	73.2	-	-	-	-	21.1	-	91.7
9.9	1.7	73.2	-	-	-	-	19.7	-	86.7
9.9	1.7	73.2	-	-	-	-	19.7	-	85.8
9.9	1.7	73.2	-	-	-	-	18.2	-	82.5
9.9	1.7	73.2	-	-	-	-	18.2	-	80.4
9.9	1.7	73.2	-	-	-	-	16.8	-	80.2
9.9	1.7	73.2	-	-	-	-	16.8	-	79.2
9.9	1.7	73.2	-	-	-	-	15.2	-	77.9
9.9	1.7	73.2	-	-	-	-	15.2	-	77.1
9.9	1.7	73.2	-	-	-	-	13.8	-	74.1
9.9	1.7	73.2	-	-	-	-	13.8	-	72.2
9.9	1.7	73.2	-	-	-	-	12.5	-	71.4
9.9	1.7	73.2	-	-	-	-	12.5	-	71.4
9.9	1.7	73.2	-	-	-	-	11.1	-	69.4
9.9	1.7	73.2	-	-	-	-	11.1	-	69.2
9.9	1.7	73.2	-	-	-	-	9.7	-	67.5
9.9	1.7	73.2	-	-	-	-	9.7	-	67.0
9.9	1.7	73.2	-	-	-	-	9.7	-	65.0
9.9	1.7	73.2	-	-	-	-	9.7	-	65.0
9.9	1.7	73.2	-	-	-	-	8.3	-	63.0
9.9	1.7	73.2	-	-	-	-	8.3	-	63.0
9.9	1.7	73.2	-	-	-	-	6.9	-	62.9
9.9	1.7	73.2	-	-	-	-	6.9	-	62.9
9.9	1.7	73.2	-	-	-	-	6.9	-	61.9
9.9	1.7	73.2	-	-	-	-	6.9	-	60.5
9.9	1.7	73.2	-	-	-	-	6.9	-	59.2
9.9	1.7	73.2	-	-	-	-	6.9	-	58.2
9.9	1.7	73.2	-	-	-	-	5.4	-	57.2
9.9	1.7	73.2	-	-	-	-	5.4	-	55.2
9.9	1.7	73.2	-	-	-	-	5.4	-	53.2
9.9	1.7	73.2	-	-	-	-	4.0	-	50.2
9.9	1.7	73.2	-	-	-	-	4.0	-	48.2
9.9	1.7	73.2	-	-	-	-	4.0	-	46.2
						-			
1,494.9	256.7	11,053.2	1,077.8	199.1	473.1	672.2	8,752.1	563.7	21,367.2

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-13:

Please provide the following for the Company's ten largest transportation customers during peak month of the most recent heating season:

a. Actual consumption;
b. Volume delivered to the Company on their behalf, if applicable;
c. Daily nomination.

Response:

Please see attached COS-13.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
TEN LARGEST TRANSPORTATION CUSTOMERS DURING PEAK MONTH OF THE MOST RECENT HEATING SEASON
JANUARY 2025

	(a.) Actual	(b. and c.) Allocated Volume		(a.) Actual	(b. and c.) Allocated Volume		(a.) Actual	(b. and c.) Allocated Volume		(a.) Actual	(b. and c.) Allocated Volume		(a.) Actual	(b. and c.) Allocated Volume
Customer 1	Consumption (Mcf)	Delivered / Daily Nomination (Mcf)	**Customer 2**	Consumption (Mcf)	Delivered / Daily Nomination (Mcf)	**Customer 3**	Consumption (Mcf)	Delivered / Daily Nomination (Mcf)	**Customer 4**	Consumption (Mcf)	Delivered / Daily Nomination (Mcf)	**Customer 5**	Consumption (Mcf)	Delivered / Daily Nomination (Mcf)
1/1/2025	3,071.0	3,500.0	1/1/2025	3,548.0	3,565.0	1/1/2025	2,984.0	2,800.0	1/1/2025	3,379.0	3,392.0	1/1/2025	3,908.0	4,109.0
1/2/2025	3,912.0	3,500.0	1/2/2025	3,633.0	3,700.0	1/2/2025	3,584.0	3,400.0	1/2/2025	3,463.0	3,392.0	1/2/2025	4,431.0	4,109.0
1/3/2025	3,515.0	3,500.0	1/3/2025	3,752.0	3,800.0	1/3/2025	3,683.0	3,500.0	1/3/2025	3,585.0	3,392.0	1/3/2025	3,647.0	4,109.0
1/4/2025	3,567.0	3,500.0	1/4/2025	3,831.0	3,850.0	1/4/2025	3,488.0	3,100.0	1/4/2025	3,879.0	3,392.0	1/4/2025	4,174.0	1,815.0
1/5/2025	3,805.0	3,500.0	1/5/2025	3,722.0	3,850.0	1/5/2025	3,973.0	3,600.0	1/5/2025	3,745.0	3,392.0	1/5/2025	3,643.0	1,815.0
1/6/2025	10,642.0	3,500.0	1/6/2025	3,795.0	3,900.0	1/6/2025	4,479.0	4,200.0	1/6/2025	3,772.0	3,392.0	1/6/2025	1,227.0	1,815.0
1/7/2025	9,866.0	10,396.0	1/7/2025	3,731.0	4,000.0	1/7/2025	4,378.0	4,300.0	1/7/2025	3,827.0	3,823.0	1/7/2025	826.0	3,726.0
1/8/2025	8,311.0	10,396.0	1/8/2025	3,779.0	4,200.0	1/8/2025	3,694.0	4,600.0	1/8/2025	3,857.0	3,823.0	1/8/2025	3,355.0	3,726.0
1/9/2025	11,363.0	10,396.0	1/9/2025	3,675.0	4,000.0	1/9/2025	3,677.0	4,500.0	1/9/2025	3,697.0	3,823.0	1/9/2025	4,245.0	3,726.0
1/10/2025	10,623.0	10,396.0	1/10/2025	3,500.0	3,750.0	1/10/2025	3,444.0	3,800.0	1/10/2025	3,476.0	3,823.0	1/10/2025	3,961.0	3,726.0
1/11/2025	3,933.0	7,001.0	1/11/2025	3,492.0	3,500.0	1/11/2025	3,111.0	3,300.0	1/11/2025	3,374.0	3,823.0	1/11/2025	3,645.0	3,726.0
1/12/2025	4,553.0	7,001.0	1/12/2025	3,345.0	3,500.0	1/12/2025	3,018.0	3,400.0	1/12/2025	3,312.0	3,823.0	1/12/2025	4,238.0	3,726.0
1/13/2025	9,436.0	7,001.0	1/13/2025	3,600.0	3,500.0	1/13/2025	4,118.0	3,500.0	1/13/2025	3,600.0	3,823.0	1/13/2025	4,861.0	3,726.0
1/14/2025	10,931.0	10,396.0	1/14/2025	3,906.0	2,966.0	1/14/2025	4,090.0	3,105.0	1/14/2025	3,636.0	3,440.0	1/14/2025	4,655.0	4,109.0
1/15/2025	11,536.0	10,396.0	1/15/2025	4,005.0	3,000.0	1/15/2025	3,943.0	3,600.0	1/15/2025	3,670.0	3,440.0	1/15/2025	1,296.0	4,109.0
1/16/2025	10,211.0	10,396.0	1/16/2025	4,068.0	3,600.0	1/16/2025	3,699.0	3,600.0	1/16/2025	3,795.0	4,109.0	1/16/2025	793.0	3,057.0
1/17/2025	11,894.0	10,396.0	1/17/2025	3,942.0	3,399.0	1/17/2025	4,467.0	2,964.0	1/17/2025	3,600.0	4,109.0	1/17/2025	926.0	3,440.0
1/18/2025	3,423.0	10,396.0	1/18/2025	4,056.0	3,600.0	1/18/2025	4,616.0	3,150.0	1/18/2025	3,684.0	4,109.0	1/18/2025	858.0	956.0
1/19/2025	4,070.0	7,700.0	1/19/2025	4,351.0	4,465.0	1/19/2025	4,934.0	4,935.0	1/19/2025	3,900.0	4,778.0	1/19/2025	1,532.0	3,536.0
1/20/2025	10,440.0	7,700.0	1/20/2025	4,575.0	4,570.0	1/20/2025	5,365.0	5,460.0	1/20/2025	5,103.0	6,211.0	1/20/2025	2,442.0	3,536.0
1/21/2025	10,482.0	11,460.0	1/21/2025	4,798.0	4,520.0	1/21/2025	5,565.0	5,360.0	1/21/2025	5,493.0	6,211.0	1/21/2025	3,105.0	4,778.0
1/22/2025	10,867.0	11,501.0	1/22/2025	3,987.0	5,018.0	1/22/2025	5,511.0	5,882.0	1/22/2025	5,510.0	6,211.0	1/22/2025	2,546.0	4,778.0
1/23/2025	9,288.0	7,608.0	1/23/2025	3,330.0	4,100.0	1/23/2025	5,142.0	5,000.0	1/23/2025	3,929.0	3,154.0	1/23/2025	3,777.0	3,153.0
1/24/2025	11,531.0	7,608.0	1/24/2025	4,234.0	5,200.0	1/24/2025	3,971.0	5,000.0	1/24/2025	3,378.0	3,154.0	1/24/2025	4,482.0	3,153.0
1/25/2025	3,623.0	5,000.0	1/25/2025	4,459.0	3,500.0	1/25/2025	3,502.0	3,150.0	1/25/2025	3,094.0	3,154.0	1/25/2025	4,372.0	2,676.0
1/26/2025	3,600.0	5,000.0	1/26/2025	4,372.0	3,500.0	1/26/2025	3,797.0	3,150.0	1/26/2025	3,239.0	3,154.0	1/26/2025	4,227.0	2,676.0
1/27/2025	4,031.0	5,000.0	1/27/2025	4,605.0	3,700.0	1/27/2025	3,533.0	3,900.0	1/27/2025	3,279.0	3,154.0	1/27/2025	3,873.0	2,676.0
1/28/2025	4,905.0	3,500.0	1/28/2025	4,527.0	4,700.0	1/28/2025	3,379.0	5,300.0	1/28/2025	3,189.0	2,293.0	1/28/2025	3,506.0	3,153.0
1/29/2025	9,345.0	3,500.0	1/29/2025	4,508.0	5,000.0	1/29/2025	3,571.0	4,500.0	1/29/2025	3,302.0	2,293.0	1/29/2025	4,189.0	3,153.0
1/30/2025	11,083.0	11,468.0	1/30/2025	4,155.0	4,400.0	1/30/2025	2,829.0	3,600.0	1/30/2025	3,017.0	2,293.0	1/30/2025	4,261.0	3,153.0
1/31/2025	11,109.8	11,469.0	1/31/2025	4,081.0	4,700.0	1/31/2025	3,135.0	3,500.0	1/31/2025	2,958.0	2,293.0	1/31/2025	4,065.0	1,433.0
Total	**238,966.8**	**234,081.0**	**Total**	**123,362.0**	**123,053.0**	**Total**	**122,680.0**	**123,156.0**	**Total**	**114,742.0**	**114,673.0**	**Total**	**101,066.0**	**101,379.0**

	(a.) Actual	(b. and c.) Allocated Volume		(a.) Actual	(b. and c.) Allocated Volume		(a.) Actual	(b. and c.) Allocated Volume		(a.) Actual	(b. and c.) Allocated Volume		(a.) Actual	(b. and c.) Allocated Volume
Customer 6	Consumption (Mcf)	Delivered / Daily Nomination (Mcf)	**Customer 7**	Consumption (Mcf)	Delivered / Daily Nomination (Mcf)	**Customer 8**	Consumption (Mcf)	Delivered / Daily Nomination (Mcf)	**Customer 9**	Consumption (Mcf)	Delivered / Daily Nomination (Mcf)	**Customer 10**	Consumption (Mcf)	Delivered / Daily Nomination (Mcf)
1/1/2025	3,142.0	3,208.0	1/1/2025	733.0	1,571.0	1/1/2025	491.0	2,000.0	1/1/2025	395.0	500.0	1/1/2025	978.0	1,100.0
1/2/2025	3,138.0	3,208.0	1/2/2025	1,243.0	1,101.0	1/2/2025	2,840.0	2,000.0	1/2/2025	457.0	550.0	1/2/2025	1,145.0	1,200.0
1/3/2025	3,132.0	3,208.0	1/3/2025	1,409.0	1,201.0	1/3/2025	1,631.0	2,879.0	1/3/2025	458.0	600.0	1/3/2025	1,485.0	1,200.0
1/4/2025	3,135.0	3,208.0	1/4/2025	1,231.0	1,101.0	1/4/2025	348.0	500.0	1/4/2025	619.0	650.0	1/4/2025	1,519.0	1,200.0
1/5/2025	3,126.0	3,208.0	1/5/2025	1,454.0	1,396.0	1/5/2025	574.0	500.0	1/5/2025	986.0	650.0	1/5/2025	1,326.0	1,300.0
1/6/2025	3,152.0	3,208.0	1/6/2025	2,719.0	1,101.0	1/6/2025	2,627.0	500.0	1/6/2025	2,056.0	2,500.0	1/6/2025	1,221.0	1,450.0
1/7/2025	3,153.0	3,208.0	1/7/2025	3,029.0	2,850.0	1/7/2025	3,445.0	2,520.0	1/7/2025	2,530.0	2,600.0	1/7/2025	1,320.0	1,550.0
1/8/2025	3,181.0	3,208.0	1/8/2025	3,000.0	3,420.0	1/8/2025	2,953.0	2,300.0	1/8/2025	2,651.0	2,600.0	1/8/2025	1,643.0	1,550.0
1/9/2025	3,172.0	3,208.0	1/9/2025	2,774.0	2,620.0	1/9/2025	2,449.0	4,500.0	1/9/2025	2,677.0	2,600.0	1/9/2025	1,669.0	1,600.0
1/10/2025	3,175.0	3,208.0	1/10/2025	3,175.0	2,700.0	1/10/2025	1,499.0	2,879.0	1/10/2025	2,126.0	1,600.0	1/10/2025	1,548.0	1,500.0
1/11/2025	3,170.0	3,208.0	1/11/2025	2,420.0	2,926.0	1/11/2025	378.0	1,400.0	1/11/2025	824.0	500.0	1/11/2025	1,447.0	1,350.0
1/12/2025	3,188.0	3,208.0	1/12/2025	1,463.0	2,926.0	1/12/2025	493.0	1,400.0	1/12/2025	1,246.0	500.0	1/12/2025	1,253.0	1,350.0
1/13/2025	3,186.0	3,208.0	1/13/2025	2,673.0	3,173.0	1/13/2025	1,955.0	1,400.0	1/13/2025	2,703.0	1,900.0	1/13/2025	1,455.0	1,350.0
1/14/2025	3,154.0	3,172.0	1/14/2025	2,591.0	2,801.0	1/14/2025	3,085.0	2,620.0	1/14/2025	2,935.0	2,600.0	1/14/2025	1,401.0	1,582.0
1/15/2025	3,158.0	3,258.0	1/15/2025	2,524.0	2,371.0	1/15/2025	3,195.0	500.0	1/15/2025	2,884.0	2,625.0	1/15/2025	1,486.0	1,600.0
1/16/2025	3,169.0	3,258.0	1/16/2025	2,669.0	2,801.0	1/16/2025	2,519.0	2,200.0	1/16/2025	2,663.0	2,800.0	1/16/2025	1,425.0	1,500.0
1/17/2025	3,173.0	3,394.0	1/17/2025	2,762.0	4,001.0	1/17/2025	2,455.0	3,500.0	1/17/2025	576.0	1,800.0	1/17/2025	1,395.0	1,300.0
1/18/2025	3,160.0	3,258.0	1/18/2025	2,393.0	2,000.0	1/18/2025	422.0	2,500.0	1/18/2025	606.0	850.0	1/18/2025	1,383.0	1,450.0
1/19/2025	3,141.0	3,258.0	1/19/2025	1,301.0	2,000.0	1/19/2025	655.0	2,500.0	1/19/2025	1,352.0	2,100.0	1/19/2025	1,562.0	1,996.0
1/20/2025	3,163.0	3,258.0	1/20/2025	2,619.0	4,200.0	1/20/2025	2,627.0	2,500.0	1/20/2025	2,636.0	3,256.0	1/20/2025	2,018.0	2,310.0
1/21/2025	3,153.0	3,258.0	1/21/2025	2,988.0	4,200.0	1/21/2025	3,211.0	3,100.0	1/21/2025	2,765.0	3,256.0	1/21/2025	2,404.0	2,310.0
1/22/2025	3,161.0	3,258.0	1/22/2025	2,731.0	4,150.0	1/22/2025	2,560.0	3,500.0	1/22/2025	2,355.0	3,781.0	1/22/2025	2,239.0	2,601.0
1/23/2025	3,143.0	3,258.0	1/23/2025	3,017.0	2,000.0	1/23/2025	2,079.0	1,500.0	1/23/2025	2,831.0	2,850.0	1/23/2025	2,059.0	2,300.0
1/24/2025	3,126.0	3,258.0	1/24/2025	2,411.0	2,000.0	1/24/2025	3,078.0	1,500.0	1/24/2025	2,402.0	2,200.0	1/24/2025	2,064.0	2,400.0
1/25/2025	3,122.0	3,258.0	1/25/2025	2,011.0	2,000.0	1/25/2025	2,098.0	1,500.0	1/25/2025	1,076.0	800.0	1/25/2025	1,702.0	2,300.0
1/26/2025	3,134.0	3,258.0	1/26/2025	1,157.0	2,000.0	1/26/2025	2,073.0	1,500.0	1/26/2025	1,139.0	1,300.0	1/26/2025	1,504.0	2,300.0
1/27/2025	3,150.0	3,258.0	1/27/2025	2,826.0	2,000.0	1/27/2025	2,819.0	1,500.0	1/27/2025	2,725.0	2,500.0	1/27/2025	1,696.0	2,300.0
1/28/2025	3,117.0	3,258.0	1/28/2025	2,806.0	1,550.0	1/28/2025	2,996.0	2,980.0	1/28/2025	2,847.0	2,400.0	1/28/2025	1,736.0	2,200.0
1/29/2025	3,111.0	3,258.0	1/29/2025	2,942.0	1,800.0	1/29/2025	2,277.0	2,980.0	1/29/2025	2,848.0	2,600.0	1/29/2025	1,789.0	2,000.0
1/30/2025	3,081.0	3,258.0	1/30/2025	2,813.0	1,800.0	1/30/2025	2,235.0	2,980.0	1/30/2025	2,771.0	1,800.0	1/30/2025	1,629.0	1,500.0
1/31/2025	3,091.0	3,258.0	1/31/2025	2,655.0	1,800.0	1/31/2025	423.0	840.0	1/31/2025	2,313.0	1,000.0	1/31/2025	1,905.5	1,000.0
Totals	**97,557.0**	**100,398.0**	Totals	**72,539.0**	**73,560.0**	Totals	**62,490.0**	**64,978.0**	Totals	**59,452.0**	**58,268.0**	Totals	**49,406.5**	**52,649.0**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Ten Largest Transportation Customers During Peak Month
Volumes in Mcf

Customer Number	January 2025 Consumption	January 2025 Allocated Delivery
1	238,966.8	234,081.0
2	123,362.0	123,053.0
3	122,680.0	123,156.0
4	114,742.0	114,673.0
5	101,066.0	101,379.0
6	97,557.0	100,398.0
7	72,539.0	73,560.0
8	62,490.0	64,978.0
9	59,452.0	58,268.0
10	49,406.5	52,649.0
	1,042,261.3	1,046,195.0

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-14:

Please provide a summary identifying the salient features of each of the following. Salient features include contract party, effective term and applicable contract quantities (daily, annual, seasonal, etc.).

a. All firm transportation agreements by type greater than one month in length. Indicate whether the capacity is available at the Company's citygate to meet design day requirements or is upstream capacity. Identify the downstream pipeline for each upstream arrangement.
b. All firm storage, gathering and exchange agreements. Indicate if each agreement provides design day capacity at the citygate or requires separate transportation (identify) service to effectuate delivery. Include on-system storage and peak shaving facilities used by the Company and identify all ratching provisions applicable to the Company's contractual and on-system storage arrangements.

Response:

Please see attached pages 2-5 for a list and salient features of NFGDC's firm transportation, storage agreements and winter gas calls which meet the design day requirements for winter 2025-2026.

a.) National Fuel Gas Distribution Company ("NFGDC") utilizes a unique delivery system that integrates all of its pipeline network with National Fuel Gas Supply Corporation's ("NFGSC") transmission system. NFGDC maintains contracts for firm transportation and storage capacity on NFGSC and on pipelines upstream of NFGSC that include Columbia Gas Transmission, Inc. ("Columbia"), Tennessee Gas Pipeline ("TGP") and Texas Eastern Transmission LP ("TETCO"), to meet the gas supply requirements of its firm sales and transportation customers.

b.) NFGDC does not own or operate on-system storage or peak shaving facilities. Pages 3 through 5 provide ratchet information related to the NFGDC's off-system storage contracts with Columbia and NFGSC.

Transportation Capacity

Pipeline & Rate Schedule	Contract	Dth/day	Contract Term	Contract Term Notice Period	Notice Date [1]	Contract End Date With Extension
Columbia Gas Transmission, Inc.						
FTS	80562	1,748	11/01/2004-3/31/2028	12 months	3/31/2027	
SST	80564	18,417	11/01/2004-3/31/2028	12 months	3/31/2027	
National Fuel Gas Supply Corp.						
EFT	E00528	291,130	4/1/2009 - 11/9/2027	12 months	11/9/2026	
EFT	E11178	9,000	4/1/2013 - 3/31/2026	6 months	10/31/2025	3/31/2027
EFT	E11969	10,000	11/1/2014 - 3/31/2026	6 months	10/31/2025	3/31/2027
EFT	E12642	10,000	11/1/2021 - 3/31/2026	12 months	3/31/2025	3/31/2027
FT	F12198	31,000	11/1/2017 - 3/31/2028	12 months	3/31/2027	
FST	N12464	14,000	4/1/2020 - 3/31/2030	12 months	3/31/2029	
Tennessee Gas Pipeline Company						
FT-A	2752	74,000	4/1/2009 - 3/31/2027	12 months	3/31/2026	
Texas Eastern Transmission LP						
FT-1	911316	10,000	11/1/2016 - 10/31/2026	12 months	10/31/2025	10/31/2027

Storage Capacity

Pipeline & Rate Schedule	Contract	Capacity	Dth/day	Contract Term	Contract Term Notice Period	Notice Date [1]	Contract Term With Extension
Columbia Gas Transmission, Inc.							
FSS	80566	564,031	18,417	11/1/1993-3/31/2028	12 months	3/31/2027	
National Fuel Gas Supply Corp.							
ESS**	G00539	8,755,100	187,563	8/1/1993 - 11/9/2027	12 months	11/9/2026	
FSS	O02432	200,000	10,666	4/1/2010 - 3/31/2026	6 months	10/31/2025	3/31/2027
FSS	O12463	651,274	14,000	4/1/2020 - 3/31/2030	12 months	3/31/2029	

Winter Gas Calls

Purchase Point	Dth/day	Contract Term
NFGSC city gate receipt points	36,000	11/1/2025 - 3/31/2026

[1] Notice date to extend contract exercised during historical period

Storage Summary Sheet
National Fuel Gas Distribution

Columbia Gas Transmission

Capacity	Maximum Monthly Inject (MMI) Month	% of capacity	Maximum Daily Injection (MDI) Numeric Monthly (MMI)	**Daily Max. not to exceed Monthly Max.**
564,031	April	15%	84,605	**2,819**
	May	20%	112,806	**3,638**
	June	20%	112,806	**3,759**
	July	20%	112,806	**3,638**
	August	18%	101,526	**3,274**
	September	13%	73,324	**2,443**
	October	9%	50,763	**1,637**
	November	5%	28,202	**939**
	December	10%	56,403	**1,818**
	January	10%	56,403	**1,818**
	February	10%	56,403	**1,944**
	March	10%	56,403	**1,818**

Maximum Injection Restrictions

Language	Numeric
As of April 1, no more than 25% of capacity	141,002
As of July 1, no more than 60% of capacity	338,362
As of September 1 no more than 85% of capacity	479,421

Storage balance

language	Numeric Monthly
less than 10%	0 to 56,402
greater than or equal to 10% and less than 20%	56,403 to 112,805
greater than or equal to 20% and less than 30%	112,806 to 169,208
greater than or equal to 30%	169,209 to 564,031

Tariff Withdrawal Entitlement (as a % of MDSQ)

language	Numeric Daily
50%	9,209
65%	11,971
80%	14,734
100%	18,417

Min/Max Monthly Withdrawal Quantities (as a % of total capacity)

month	language		Numeric Monthly
November	0% to 40%	to	0 to 225,612
December	0% to 40%	to	0 to 225,612
January	0% to 40%	to	0 to 225,612
February	10% to 30%	to	56,403 to 169,209
March	10% to 20%	to	56,403 to 112,806

Remaining Inventory Limits

date	language	Numeric
April 1	less than or equal to 25% of capacity	0 to 141,002
	Note: Volumes in excess of 25% of SCQ will be forfeited.	
February 1	less than or equal to 65% of capacity	0 to 366,615

National Fuel Gas Supply Corp. ESS

NFGSC ESS-1 G00539

Capacity	*Storage Balance* language	numeric	*Tariff Injection Entitlement* language	numeric	*Tariff Withdrawal Entitlement* language	numeric	*Withdrawl Limitations* language	numeric	language	numeric
8,755,100	less than 80% of capacity	0 *to* 7,004,080	1/170th of total capacity	51,501			on March 1 reduced by 10%	168,807	on March 31 balance must be 30% or less	2,626,530 *to* 0
	greater than or equal to 80% of capacity	7,004,080 *to* 8,755,100	80% or 1/200th total capacity	43,776						
	less than or equal to 10% of capacity	0 *to* 875,510			70% of MDWQ	131,295				
	greater than 10% and less than or equal to 20%	875,510 *to* 1,751,020			80% of MDWQ	150,051				
	greater than 20% and less than or equal to 30%	1,751,020 *to* 2,626,530			90% of MDWQ	168,807				
Withdrawal Days 46.678 187,564	greater than 30% of capacity	2,626,530 *to* 8,755,100			100% of MDWQ	187,564				

National Fuel Gas Distribution Corporation

Storage Summary Sheet

Pennsylvania

19 Day Service

Capacity 200,000

NFGSC - FSS - O02432

Storage Balance Language	Numeric	Tariff Injection Entitlement Language	Tariff Injection Entitlement Numeric	Tariff Withdrawal Entitlement Language	Tariff Withdrawal Entitlement Numeric	Withdrawal Limitations Language	Withdrawal Limitations Numeric
		1/90th of total capacity	2,222			*Nov. 1 - Feb. 28*	
less than 10% of capacity	0 *to* 20,000			MDWQ	9,599		
greater than 10% and less than or equal 15%	20,000 *to* 30,000			MDWQ	9,924		
greater than 15% and less than or equal 30%	30,000 *to* 60,000			MDWQ	10,332		
greater than 30% of capacity	60,000 *to* 200,000			MDWQ	10,666		

Pennsylvania

46 Day Service

Capacity 651,274

NFGSC - FSS -

		Tariff Injection Entitlement Language	Tariff Injection Entitlement Numeric	Tariff Withdrawal Entitlement Language	Tariff Withdrawal Entitlement Numeric	Withdrawal Limitations Language	Withdrawal Limitations Numeric
less than 25% of capacity	0 *to* 162,819	1/151 of total capacity	4,313			*Jan 1 - Apr 15*	
greater than or equal to 25% of capacity	162,819 *to* 651,274	1/189th of capacity	3,450				
less than 47% of capacity	0 *to* 306,099			MDWQ	4,400		
greater than 47% and less than or equal 80%	306,099 *to* 521,019			MDWQ	8,100		
greater than 80% of capacity	521,019 *to* 651,274			MDWQ	14,000		

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-15:

For the most recent annual period available, please identify the applicable monthly volumes and revenues under each rate schedule which were:

a. Sold under a negotiated or market-based rate.
b. Transported under a negotiated or market-based rate.
c. Transported at full margin transportation rates.

Response:

Please see Attachment COS-15.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Sales and Revenues for Selected Rate Schedules

	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25
a. Sold under a negotiated or market-based rate												
None												
b. Transported under a negotiated or market based rate												
Sales (Mcf)												
LIS DMT (N)	587,209	606,268	655,915	711,269	827,660	737,595	770,674	612,741	579,840	527,486	581,920	551,544
	587,209	606,268	655,915	711,269	827,660	737,595	770,674	612,741	579,840	527,486	581,920	551,544
Revenue ($)												
LIS DMT (N)	234,593	240,619	250,985	271,710	323,179	296,728	281,801	250,870	240,185	239,071	234,932	232,781
	234,593	240,619	250,985	271,710	323,179	296,728	281,801	250,870	240,185	239,071	234,932	232,781
c. Transported at full margin transportation rates												
Sales (Mcf)												
Residential SATC	47,391	96,500	233,847	326,337	340,707	271,963	187,546	101,189	58,460	18,577	26,700	33,856
Residential MMT	2,187	6,042	14,375	20,717	23,399	19,008	12,746	6,606	3,690	130	860	1,124
SCPA < 250 SATC	1,746	4,470	11,969	18,684	20,299	16,604	9,694	4,700	1,303	(1)	662	1,169
SCPA < 250 MMT	3,431	8,315	21,712	33,790	38,465	27,377	16,328	7,454	3,409	427	1,384	1,988
SCPA > 250 SATC	5,057	9,155	20,643	29,230	29,470	25,043	16,363	8,791	4,497	2,774	3,279	4,003
SCPA > 250 MMT	19,945	39,280	91,471	139,737	147,155	117,973	78,236	42,962	22,722	9,195	13,020	15,005
LCPA SATC	3,245	6,183	10,867	15,066	14,931	12,610	7,710	6,188	2,648	2,521	2,176	2,573
LCPA MMT	138,873	276,570	447,874	675,268	808,849	668,496	510,448	349,378	212,432	124,457	111,994	145,114
LCPA DMT	54,979	67,699	81,230	117,176	100,887	101,604	92,597	76,980	54,279	51,300	53,610	50,898
SVIS SATC	4	103	449	756	900	918	491	242	(182)	37	14	31
SVIS MMT	649	2,930	5,044	8,606	9,518	6,749	3,878	1,703	666	4,821	264	301
IVIS SATC	18	226	740	1,699	1,456	988	965	447	99	14	4	9
IVIS MMT	115,719	156,127	186,292	261,371	328,793	289,140	228,299	166,918	125,632	116,316	111,196	123,660
IVIS DMT	37,967	49,449	53,613	76,570	97,129	82,799	75,166	60,733	50,263	45,497	43,636	41,260
LVIS MMT	30,073	37,091	41,537	40,962	49,392	40,352	42,930	47,531	42,410	40,298	35,752	44,035
LVIS DMT	118,195	140,776	153,578	185,802	239,968	213,066	175,193	134,375	127,065	110,366	137,384	92,473
LIS MMT	30,946	30,426	32,253	29,558	35,804	32,014	33,409	30,961	29,869	26,644	26,501	27,507
LIS DMT	224,392	255,936	285,279	367,115	425,555	390,398	382,886	286,135	215,840	177,881	208,138	198,815
	834,816	1,187,278	1,692,772	2,348,442	2,712,675	2,317,101	1,874,884	1,333,292	955,102	731,254	776,576	783,820
Revenue ($)												
Residential SATC	413,046	645,249	1,039,669	1,331,671	1,377,100	1,223,763	949,435	609,507	465,868	315,491	352,107	379,146
Residential MMT	16,864	35,200	62,777	84,605	91,859	80,764	59,519	33,262	20,560	7,810	10,630	11,512
SCPA < 250 SATC	25,484	35,605	53,342	70,630	73,836	67,298	48,881	33,167	23,095	18,023	20,662	22,109
SCPA < 250 MMT	40,943	60,552	94,120	126,998	137,638	112,102	81,685	53,474	42,091	32,213	35,909	38,484
SCPA > 250 SATC	25,126	38,445	61,825	80,795	80,874	74,779	53,769	33,269	22,151	17,812	18,974	21,339
SCPA > 250 MMT	102,189	168,421	286,649	403,535	416,283	362,077	266,380	161,983	107,631	70,850	81,885	87,747
LCPA SATC	13,874	20,065	29,801	37,710	37,372	32,332	22,286	19,619	11,847	11,934	11,092	11,783
LCPA MMT	461,554	773,256	1,158,860	1,671,060	1,963,382	1,650,729	1,298,530	938,290	644,631	421,373	411,511	490,334
LCPA DMT	91,199	116,502	136,338	196,631	171,633	171,644	156,469	132,436	95,852	91,696	94,962	90,770
SVIS SATC	653	1,090	2,031	2,719	3,039	3,202	2,196	1,698	374	1,011	940	982
SVIS MMT	6,734	14,210	16,749	27,948	30,074	22,742	15,278	9,601	6,885	17,631	5,900	5,951
IVIS SATC	785	1,122	1,955	3,841	3,331	2,377	2,347	1,500	926	793	776	785
IVIS MMT	247,769	325,001	391,317	533,506	653,155	581,263	475,344	362,263	284,489	256,727	245,364	270,599
IVIS DMT	60,162	78,177	84,402	114,037	144,034	124,996	114,345	96,362	81,833	74,127	72,936	68,431
LVIS MMT	50,159	61,281	67,768	66,929	79,556	66,310	70,087	77,288	69,740	66,627	60,448	73,660
LVIS DMT	149,496	178,584	190,619	224,460	285,091	269,714	209,137	172,215	159,864	143,220	255,743	48,237
LIS MMT	33,697	33,596	35,543	32,671	39,490	35,433	36,926	34,511	33,336	29,863	29,968	31,621
LIS DMT	163,093	186,886	200,496	249,767	286,150	262,222	259,091	204,727	157,027	136,992	156,530	143,680
	1,902,825	2,773,241	3,914,261	5,259,513	5,873,897	5,143,746	4,121,704	2,975,173	2,228,200	1,714,192	1,866,337	1,797,170

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-16:
Please provide the following for each curtailment during the last three years:

a. Dates of curtailment.
b. Type of curtailment (firm service, interruptible service, both).
c. Whether curtailment was related to amount of capacity on the Company's system, other capacity or supply related.
d. Rate schedule that curtailed volumes would have been billed under.
e. Curtailed volumes by rate schedule.
f. Actual volumes moved by rate schedule.

Response:
National Fuel Gas Distribution - Pennsylvania Division has not experienced a curtailment situation during the last decade.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-17:
Please identify the Company's design day planning criteria and the probability of design day occurrence. Include any available documentation supporting the Company's claimed probability of occurrence.

Response:

For Distribution's Peak Day planning criteria and the probability of design day occurrence, please see Exhibit 15 from the Company's most recent 1307F filing (Docket No. R-2026-3059551) and the testimony of Shannon Putnam in the same proceeding.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-18:
For each customer class contained in the cost of service study, please provide monthly throughput by class.

Response:

Please see attachments COS-18.

National Fuel Gas Distribution Corporation — **Gas Requirements**
Pennsylvania Division — **2026RC**
Projected Volumes in Mcf
Rev Mth

FTY 2026 (Revenue Month)

0.15% **Shrinkage**

Retail Sales	October 2025	November 2025	December 2025	January 2026	February 2026	March 2026	April 2026	May 2026	June 2026	July 2026	August 2026	Sept 2026	Total
Residential	551,913	1,279,185	2,348,483	2,991,851	2,976,857	2,589,587	1,961,046	1,223,479	506,109	254,987	225,697	269,132	17,178,326
Commercial	95,608	217,613	396,872	514,308	516,913	448,479	342,032	211,075	91,263	51,522	44,924	54,248	2,984,857
Industrial	7,232	13,563	28,540	38,685	42,742	35,492	26,565	16,065	7,611	6,088	3,668	4,199	230,450
Public Authority	4,892	12,243	25,684	33,587	31,898	27,478	20,927	11,842	3,836	1,565	936	1,491	176,378
Subtotal Retail Sales	659,645	1,522,603	2,799,579	3,578,431	3,568,410	3,101,035	2,350,570	1,462,462	608,818	314,162	275,225	329,070	20,570,010
Company Use	237	745	1,583	2,147	2,202	1,712	1,308	595	163	73	53	85	10,903
Total Retail Sales	659,882	1,523,348	2,801,163	3,580,578	3,570,611	3,102,747	2,351,878	1,463,057	608,981	314,235	275,278	329,155	20,580,914
Retail Sales Shrinkage	991	2,288	4,208	5,379	5,364	4,661	3,533	2,198	915	472	414	494	30,917
Total Retail Sales Requirements	660,873	1,525,636	2,805,371	3,585,957	3,575,975	3,107,408	2,355,411	1,465,255	609,896	314,707	275,692	329,649	20,611,831
Transportation Service													
Residential MMT Transportation	7,185	17,526	32,497	44,751	49,119	42,764	35,280	23,375	11,881	5,832	4,830	5,289	280,330
Commercial MMT Transportation	118,571	233,122	403,135	531,893	566,846	495,084	406,139	264,133	145,208	91,603	83,040	91,349	3,430,122
Industrial MMT Transportation	213,779	262,221	310,955	349,128	393,590	360,698	338,170	254,616	232,444	213,504	209,931	217,551	3,356,588
Public Authority MMT Transportation	50,087	114,823	203,779	274,276	311,469	276,241	242,541	158,460	83,636	41,151	35,012	36,330	1,827,805
Total MMT Service	389,622	627,693	950,365	1,200,048	1,321,023	1,174,787	1,022,130	700,584	473,170	352,090	332,814	350,519	8,894,845
MMT Service Shrinkage	585	942	1,428	1,802	1,985	1,765	1,535	1,052	711	530	500	527	13,362
Total MMT Service Requirements	390,207	628,635	951,793	1,201,850	1,323,008	1,176,552	1,023,665	701,636	473,881	352,620	333,314	351,046	8,908,207
Residential SATC Transportation	52,463	118,276	216,001	274,669	271,954	236,937	180,873	114,606	47,372	24,478	21,798	25,688	1,585,116
Commercial SATC Transportation	9,418	22,097	38,037	48,102	46,664	40,266	30,290	18,835	8,294	4,422	3,896	5,019	275,340
Industrial SATC Transportation	229	568	1,447	1,939	2,125	1,678	1,292	635	267	125	114	140	10,558
Public Authority SATC Transportation	460	1,003	2,118	3,040	3,111	2,675	1,938	884	433	376	103	155	16,296
Total SATC Service	62,570	141,943	257,603	327,750	323,854	281,557	214,393	134,961	56,365	29,401	25,911	31,002	1,887,311
SATC Service Shrinkage	94	214	386	493	487	423	323	202	84	45	39	47	2,837
Total SATC Service Requirements	62,664	142,157	257,989	328,243	324,341	281,980	214,716	135,163	56,449	29,446	25,950	31,049	1,890,148
Residential DMT Transportation	0	0	0	0	0	0	0	0	0	0	0	0	0
Commercial DMT Transportation	50,901	65,881	67,309	73,313	81,879	73,457	66,268	54,419	47,325	43,823	43,997	48,110	716,683
Industrial DMT Transportation	1,032,267	1,108,773	1,235,077	1,384,780	1,514,170	1,417,705	1,387,264	1,165,507	1,054,678	1,017,029	973,405	1,030,617	14,321,271
Public Authority DMT Transportation	10,699	20,147	22,056	26,360	25,242	27,343	19,326	14,449	3,770	7,255	15,421	11,095	203,162
Total DMT Service	1,093,867	1,194,801	1,324,442	1,484,453	1,621,291	1,518,504	1,472,858	1,234,376	1,105,773	1,068,107	1,032,822	1,089,822	15,241,116
DMT Service Shrinkage	1,643	1,795	1,989	2,230	2,436	2,281	2,213	1,855	1,661	1,605	1,551	1,637	22,896
Total DMT Service Requirements	1,095,510	1,196,596	1,326,431	1,486,683	1,623,727	1,520,785	1,475,071	1,236,231	1,107,434	1,069,712	1,034,373	1,091,459	15,264,012
Residential Transportation Service	59,648	135,802	248,498	319,420	321,073	279,702	216,154	137,982	59,253	30,310	26,629	30,976	1,865,447
Commercial Transportation Service	178,889	321,100	508,481	653,308	695,389	608,806	502,698	337,387	200,827	139,848	130,933	144,478	4,422,145
Industrial Transportation Service	1,246,275	1,371,562	1,547,479	1,735,847	1,909,885	1,780,080	1,726,726	1,420,759	1,287,389	1,230,658	1,183,450	1,248,308	17,688,417
Public Authority Transportation Service	61,246	135,973	227,953	303,676	339,821	306,259	263,804	173,793	87,839	48,782	50,536	47,580	2,047,263
Total Transportation Service	1,546,058	1,964,437	2,532,410	3,012,252	3,266,168	2,974,848	2,709,381	2,069,920	1,635,309	1,449,599	1,391,547	1,471,343	26,023,272
Total Transportation Shrinkage	2,322	2,951	3,803	4,525	4,908	4,469	4,071	3,109	2,456	2,180	2,090	2,211	39,095
Total Transportation Requirements	1,548,380	1,967,388	2,536,213	3,016,777	3,271,076	2,979,317	2,713,452	2,073,029	1,637,765	1,451,779	1,393,637	1,473,554	26,062,367
Total Requirements	2,209,253	3,493,024	5,341,584	6,602,734	6,847,051	6,086,725	5,068,863	3,538,284	2,247,661	1,766,485	1,669,329	1,803,203	46,674,198

National Fuel Gas Distribution Corporation — **Gas Requirements**
Pennsylvania Division — **2026RC**
Projected Volumes in Mcf
Rev Mth — **FPFTY 2027 (Revenue Month)**

0.15% Shrinkage

Retail Sales	November 2026	December 2026	January 2027	February 2027	March 2027	April 2027	May 2027	June 2027	July 2027	August 2027	Sept 2027	October 2027	Total
Residential	1,283,898	2,355,917	3,000,230	2,985,135	2,597,119	1,967,444	1,228,626	510,008	258,383	229,031	272,568	561,049	17,249,408
Commercial	219,850	400,652	519,115	521,683	452,901	345,420	213,191	92,175	51,942	45,297	54,694	97,473	3,014,392
Industrial	13,241	27,931	37,897	42,516	35,248	25,942	15,658	7,510	5,916	3,556	4,082	6,837	226,334
Public Authority	10,980	22,980	30,485	28,818	24,467	18,596	10,437	3,368	1,331	756	1,269	3,803	157,291
Subtotal Retail Sales	1,527,968	2,807,480	3,587,727	3,578,151	3,109,735	2,357,403	1,467,912	613,061	317,571	278,641	332,613	669,162	20,647,425
Company Use	745	1,583	2,147	2,202	1,712	1,308	595	163	73	53	85	237	10,903
Total Retail Sales	1,528,713	2,809,064	3,589,874	3,580,353	3,111,447	2,358,710	1,468,508	613,224	317,644	278,694	332,698	669,400	20,658,328
Retail Sales Shrinkage	2,297	4,220	5,393	5,379	4,674	3,543	2,206	921	477	419	500	1,006	31,035
Total Retail Sales Requirements	1,531,010	2,813,284	3,595,267	3,585,732	3,116,121	2,362,253	1,470,714	614,145	318,121	279,113	333,198	670,406	20,689,363
Transportation Service													
Residential MMT Transportation	17,967	32,647	44,928	49,297	42,927	35,419	23,485	11,963	5,896	4,893	5,372	7,475	282,269
Commercial MMT Transportation	235,273	407,125	537,169	572,249	499,704	409,582	266,191	146,117	92,110	83,474	91,979	120,456	3,461,429
Industrial MMT Transportation	264,905	312,289	350,193	394,794	361,723	339,226	254,934	233,489	214,058	210,316	217,742	219,217	3,372,888
Public Authority MMT Transportation	115,255	204,748	275,659	312,608	277,290	243,077	158,671	83,588	41,065	34,925	36,282	50,325	1,833,494
Total MMT Service	633,401	956,809	1,207,948	1,328,949	1,181,644	1,027,305	703,281	475,157	353,129	333,608	351,376	397,473	8,950,079
MMT Service Shrinkage	951	1,438	1,814	1,997	1,775	1,543	1,056	715	531	500	528	597	13,445
Total MMT Service Requirements	634,352	958,247	1,209,762	1,330,946	1,183,419	1,028,848	704,337	475,872	353,660	334,108	351,904	398,070	8,963,524
Residential SATC Transportation	118,711	216,685	275,438	272,711	237,626	181,463	115,089	47,737	24,804	22,120	26,016	53,332	1,591,734
Commercial SATC Transportation	20,511	35,116	44,408	42,974	37,064	27,870	17,334	7,692	4,144	3,646	4,714	8,041	253,514
Industrial SATC Transportation	568	1,447	1,939	2,125	1,678	1,292	635	267	125	114	140	229	10,558
Public Authority SATC Transportation	1,003	2,118	3,040	3,111	2,675	1,938	884	433	376	103	155	460	16,296
Total SATC Service	140,793	255,366	324,826	320,920	279,044	212,563	133,942	56,129	29,449	25,983	31,026	62,062	1,872,102
SATC Service Shrinkage	212	384	489	483	420	320	201	85	44	38	46	93	2,815
Total SATC Service Requirements	141,005	255,750	325,315	321,403	279,464	212,883	134,143	56,214	29,493	26,021	31,072	62,155	1,874,917
Residential DMT Transportation	0	0	0	0	0	0	0	0	0	0	0	0	0
Commercial DMT Transportation	65,881	67,309	73,313	81,879	73,457	66,268	54,419	47,325	43,823	43,997	48,110	50,901	716,683
Industrial DMT Transportation	1,111,346	1,240,852	1,450,257	1,591,630	1,486,505	1,455,520	1,221,563	1,092,805	1,055,781	1,011,643	1,073,610	1,068,261	14,859,771
Public Authority DMT Transportation	20,147	22,056	26,360	25,242	27,343	19,326	14,449	3,770	7,255	15,421	11,095	10,699	203,162
Total DMT Service	1,197,373	1,330,216	1,549,931	1,698,751	1,587,304	1,541,114	1,290,431	1,143,900	1,106,860	1,071,060	1,132,815	1,129,861	15,779,615
DMT Service Shrinkage	1,799	1,998	2,329	2,552	2,384	2,316	1,939	1,719	1,663	1,609	1,702	1,697	23,707
Total DMT Service Requirements	1,199,172	1,332,214	1,552,260	1,701,303	1,589,688	1,543,430	1,292,370	1,145,619	1,108,523	1,072,669	1,134,517	1,131,558	15,803,322
Residential Transportation Service	136,679	249,332	320,366	322,008	280,554	216,883	138,573	59,701	30,701	27,013	31,388	60,807	1,874,003
Commercial Transportation Service	321,665	509,550	654,890	697,102	610,225	503,721	337,944	201,133	140,077	131,116	144,803	179,398	4,431,625
Industrial Transportation Service	1,376,819	1,554,588	1,802,389	1,988,549	1,849,906	1,796,038	1,477,132	1,326,561	1,269,964	1,222,073	1,291,493	1,287,707	18,243,217
Public Authority Transportation Service	136,405	228,922	305,059	340,960	307,308	264,340	174,004	87,791	48,696	50,449	47,532	61,484	2,052,952
Total Transportation Service	1,971,568	2,542,391	3,082,705	3,348,620	3,047,992	2,780,982	2,127,653	1,675,185	1,489,438	1,430,651	1,515,216	1,589,396	26,601,797
Total Transportation Shrinkage	2,962	3,820	4,632	5,032	4,579	4,179	3,196	2,519	2,238	2,147	2,276	2,387	39,967
Total Transportation Requirements	1,974,530	2,546,211	3,087,337	3,353,652	3,052,571	2,785,161	2,130,849	1,677,704	1,491,676	1,432,798	1,517,492	1,591,783	26,641,764
Total Requirements	3,505,540	5,359,495	6,682,604	6,939,384	6,168,692	5,147,414	3,601,563	2,291,849	1,809,797	1,711,911	1,850,690	2,262,188	47,331,126

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-19:

Please provide workpapers showing the development of each allocation factor reflected in the Company's cost of service study. Include a description of each allocation factor, all calculations performed to develop the allocators and all supporting documentation, studies or other information relied upon to determine the allocators.

Response:

Please refer to National Fuel Gas Exhibit D – Cost of Service Study for a description and development of each allocation factor. Please refer to Attachment COS-19 for the supporting workpapers provided in electronic format on USB flash drive.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-20:

Please provide all workpapers, calculations and supporting documentation for the functionalization and classification performed for the Company's cost of service study.

Response:

Please refer to the response to COS-08.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Cost of Service

Question No. COS-21:

If not provided elsewhere, please provide a detailed proof of revenues at both present and proposed rates.

Response:

See National Fuel Gas Exhibit E – Proof of Revenue.

SUPPLEMENTAL DATA REQUESTS

RATE OF RETURN

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-01:

Please supply copies of the following documents for the Company and, if applicable, its parent:

a. Most recent Annual Report to shareholders (including any statistical supplements);
b. Most recent SEC Form 10K;
c. All SEC Form 10Q reports issued within last year.

Response:

a. NFG Annual reports are available at the following link: https://investor.nationalfuelgas.com/financials/annual-reports/default.aspx

b. NFG SEC filings including the 10-K are archived at the following link: https://investor.nationalfuelgas.com/financials/sec-filings/default.aspx

c. NFG SEC filings including the 10-Q are archived at the following link: https://investor.nationalfuelgas.com/financials/sec-filings/default.aspx

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-02:

Please supply copies of the Company's balance sheets for each month/quarter for the last two years.

Response:

See attached for NFGDC’s balance sheets.

ASSETS	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25
Total Gross Plant	2,715,503	2,727,166	2,738,248	2,750,300	2,760,557	2,773,459	2,782,169	2,797,256	2,811,724	2,822,029	2,834,616	2,863,782
Gross Plant - Existing Assets	2,618,806	2,613,803	2,671,260	2,639,103	2,635,738	2,707,466	2,691,226	2,687,330	2,770,330	2,733,456	2,729,949	2,813,944
CWIP - Existing Assets	83,101	88,836	66,988	95,227	97,881	65,993	78,134	80,894	41,394	71,187	69,218	49,838
Gross Plant - New Additions	13,596	24,527	-	15,971	26,938	-	12,809	29,033	-	17,385	35,449	-
CWIP - New Additions	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	0	0	0
Total Accumulated Depreciation	(855,561)	(859,032)	(862,400)	(865,048)	(869,663)	(872,858)	(873,492)	(877,696)	(880,356)	(882,927)	(887,297)	(889,323)
Accumulated Depreciation - Existing Assets	(855,561)	(859,032)	(862,400)	(865,048)	(869,663)	(872,858)	(873,492)	(877,696)	(880,356)	(882,927)	(887,297)	(889,323)
Accumulated Depreciation - New Additions	-	-	-	-	-	-	-	-	-	-	-	-
Net Plant	1,859,942	1,868,134	1,875,848	1,885,252	1,890,893	1,900,601	1,908,677	1,919,560	1,931,368	1,939,102	1,947,319	1,974,459
Net Plant - Existing Assets	1,846,346	1,843,607	1,875,848	1,869,281	1,863,955	1,900,601	1,895,868	1,890,528	1,931,368	1,921,717	1,911,870	1,974,459
Net Plant - New Additions	13,596	24,527	(0)	15,971	26,938	(0)	12,809	29,033	(0)	17,385	35,449	0
Cash	3,038	13,689	2,412	4,695	4,543	7,402	4,183	4,699	8,580	4,598	9,847	6,239
Temp Cash Investments	1,576	1,589	1,595	1,600	1,606	1,611	1,616	1,621	1,627	1,632	1,637	8,643
Notes Receivable Intercompany	-	-	-	-	-	-	-	-	-	-	-	-
Notes Receivable: Current Portion of LTD at Subs	-	-	-	-	-	-	-	-	-	-	-	-
Hedging Collateral Deposits	-	-	-	-	-	-	-	-	-	-	-	-
Accounts Receivable Intercompany	5,946	12,011	7,366	7,323	6,304	6,866	6,919	18,877	10,013	7,137	7,426	9,698
Accounts Receivable	68,893	53,184	81,085	96,472	128,949	135,347	139,439	120,694	101,594	79,005	65,428	64,952
Allowance for Doubtful Accounts	(24,557)	(25,419)	(27,806)	(16,381)	(17,992)	(22,873)	(23,300)	(23,600)	(23,154)	(21,502)	(19,651)	(16,521)
Unbilled Utility Revenue Receivable	32,042	45,422	57,117	57,450	52,729	49,077	39,059	27,574	15,347	15,397	19,310	16,219
Dividends Receivable Intercompany	-	-	-	-	-	-	-	-	-	-	-	-
Materials and Supplies	18,340	18,223	18,381	18,780	18,627	18,576	18,219	18,649	18,696	18,499	18,927	18,927
Gas Storage Inventory	41,766	35,987	24,634	13,734	9,318	6,413	7,218	9,613	12,810	15,550	21,975	33,468
Unrecovered Gas Cost	-	-	-	757	3,368	3,562	4,625	2,630	2,903	3,096	2,669	5,769
Prepaid Expenses and Other Current Assets	53,316	51,098	66,394	57,179	52,059	52,684	39,860	39,072	44,595	35,629	34,070	73,044
Deferred Tax Asset	-	-	-	-	-	-	-	-	-	-	-	-
Total Current Assets	**200,361**	**205,786**	**231,178**	**241,609**	**259,510**	**258,666**	**237,836**	**219,830**	**193,010**	**159,043**	**161,638**	**220,439**
Investment in Subsidiaries	-	-	-	-	-	-	-	-	-	-	-	-
Recoverable Future Taxes	74,380	75,315	77,007	78,824	80,628	81,920	82,956	83,917	83,820	84,960	85,504	82,609
Unamortized Debt Expense	2,562	2,501	2,441	2,381	2,321	2,260	2,200	2,140	2,079	2,019	1,959	1,898
Regulatory Assets	75,477	76,089	72,473	72,917	76,985	83,653	85,056	85,733	88,650	88,675	89,054	94,665
Other Deferred Charges	8,330	8,577	10,371	9,969	10,091	10,127	10,100	11,051	11,072	11,335	11,200	11,235
Other Investments	10,544	10,605	10,608	10,665	10,780	10,818	10,883	10,889	10,978	10,970	11,085	4,126
Equity Investments	-	-	-	-	-	-	-	-	-	-	-	-
Goodwill	-	-	-	-	-	-	-	-	-	-	-	-
Notes Receivable Intercompany LTD	-	-	-	-	-	-	-	-	-	-	-	-
Other Non Current Assets	150,704	151,500	174,271	153,054	154,722	182,861	157,439	158,110	186,996	158,747	159,171	144,857
Security Deposit to Affiliate	-	-	-	-	-	-	-	-	-	-	-	-
Intra Segment Security Deposit Receivable	-	-	-	-	-	-	-	-	-	-	-	-
FMV of Deriv Financial Instruments Asset	-	-	-	-	-	-	-	-	-	-	-	-
Total Non-Current Assets	**321,996**	**324,587**	**347,172**	**327,810**	**335,527**	**371,638**	**348,634**	**351,840**	**383,595**	**356,705**	**357,973**	**339,390**
Total Assets	**2,382,299**	**2,398,506**	**2,454,198**	**2,454,672**	**2,485,931**	**2,530,906**	**2,495,147**	**2,491,230**	**2,507,973**	**2,454,850**	**2,466,929**	**2,534,289**

Liabilities & Stockholders Equity	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25
Preferred Stock	-	-	-	-	-	-	-	-	-	-	-	-
Common Stock & Paid in Capital	227,617	227,617	228,585	228,585	228,585	229,854	229,854	229,854	231,029	231,029	281,029	281,749
Common Stock and Paid in Capital	-	-	-	-	-	-	-	-	-	-	-	-
Common Stock and Paid in Capital (Subs)	227,617	227,617	228,585	228,585	228,585	229,854	229,854	229,854	231,029	231,029	281,029	281,749
Retained Earnings	463,195	470,681	478,006	502,317	526,494	528,250	538,839	540,659	518,747	513,721	510,273	486,457
Accumulated Other Comprehensive Income	(10,097)	(10,097)	(10,097)	(10,097)	(10,097)	(10,097)	(10,097)	(10,097)	(10,097)	(10,097)	(10,097)	(12,750)
Accumulated Other Comprehensive Income	-	-	-	-	-	-	-	-	-	-	-	-
Accumulated Other Comprehensive Income (Subs)	(10,097)	(10,097)	(10,097)	(10,097)	(10,097)	(10,097)	(10,097)	(10,097)	(10,097)	(10,097)	(10,097)	(12,750)
Total Common Stock Equity	**680,715**	**688,201**	**696,494**	**720,806**	**744,982**	**748,007**	**758,596**	**760,416**	**739,679**	**734,653**	**781,205**	**755,456**
LIABILITIES												
Long-term portion of Total LTD	425,000	425,000	425,000	425,000	425,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000
Unamortized Debt Expense Total LTD	-	-	-	-	-	-	-	-	-	-	-	-
Long-Term Debt, Net of Unamort Disc and Debt Issue Costs	-	-	-	-	-	-	-	-	-	-	-	-
Total Capitalization	**1,105,715**	**1,113,201**	**1,121,494**	**1,145,806**	**1,169,982**	**1,348,007**	**1,358,596**	**1,360,416**	**1,339,679**	**1,334,653**	**1,381,205**	**1,355,456**
Notes Payable	-	-	-	-	-	-	-	-	-	-	-	-
Notes Payable Interco	264,200	266,800	264,100	278,200	281,000	101,200	95,400	111,800	166,500	193,000	168,700	191,700
Notes Payable Intercompany	-	-	-	-	-	-	-	-	-	-	-	-
Notes Payable (Distribution to NFG)	264,200	266,800	264,100	278,200	281,000	101,200	95,400	111,800	166,500	193,000	168,700	191,700
Current Portion of Total LTD	50,000	50,000	50,000	50,000	50,000	50,000	50,000	50,000	-	-	-	-
Accounts Payable	24,738	31,944	44,481	68,854	62,869	46,275	50,393	36,578	33,678	34,000	30,697	41,237
Accounts Payable Intercompany	24,112	25,530	25,386	25,637	24,344	24,753	24,365	23,390	25,176	24,535	24,087	22,915
Amounts Payable to Customer	41,609	38,330	42,586	24,502	25,610	34,393	39,800	36,520	24,275	11,351	3,458	968
Dividends Payable	-	-	-	-	-	-	-	-	-	-	-	-
Dividends Payable Intercompany	-	-	13,300	-	-	13,300	-	-	14,500	-	-	14,500
Customer Advances	26,651	26,689	15,295	-	-	-	-	-	-	-	3,464	17,188
Customer Deposits	20,942	20,789	21,499	20,749	20,691	19,423	18,088	17,317	17,506	17,028	17,048	17,186
Reserve for Gas Replacement	-	-	1,316	12,719	21,166	27,614	25,829	18,578	12,706	6,898	2,196	-
Accrued State Taxes Payable	(8,400)	(8,438)	-	(8,787)	(8,351)	-	(7,327)	(7,710)	-	(9,780)	(10,213)	-
Accrued Federal Taxes Payable	(18,880)	(19,508)	(18,286)	(21,232)	(17,805)	(13,674)	(11,912)	(13,286)	(19,710)	(25,683)	(30,334)	-
Accrued Other Taxes Payable	(88)	604	642	2,094	3,536	1,450	2,522	3,388	443	1,300	2,291	(382)
FMV of Deriv Financial Instruments Credit	-	-	-	-	-	-	126	423	445	103	-	71
Other Current Liabilities	(0)	-	(0)	-	-	-	(0)	0	(0)	(0)	(0)	0
Accrued Liabilities	42,338	38,785	31,380	28,731	24,998	26,074	26,196	27,636	33,648	30,432	32,144	37,683
Total Accrued Interest	3,483	5,511	7,540	9,568	9,721	6,549	5,119	8,040	9,398	12,006	14,614	5,656
Total Current Liabilities	**470,705**	**477,035**	**499,240**	**491,035**	**497,779**	**337,355**	**318,600**	**312,676**	**318,566**	**295,189**	**258,152**	**348,722**
Total Accumulated Deferred Income Taxes	307,274	310,482	316,393	327,968	332,190	332,986	334,428	336,764	340,527	346,397	350,389	351,107
Taxes Refundable to Customer	137,147	136,935	136,857	136,823	136,762	136,572	136,343	136,101	135,932	135,552	135,299	138,569
S. Georgia Customer Refund Payable	-	-	-	-	-	-	-	-	-	-	-	-
Effective Tax Rate Chg Customer Ref Payable	-	-	-	-	-	-	-	-	-	-	-	-
ARAM Customer Refund Payable	-	-	-	-	-	-	-	-	-	-	-	-
Unamortized Investment Tax Credit	0	0	0	0	0	0	0	0	0	0	0	0
Cost of Removal Regulatory Liability	183,430	183,430	185,071	185,071	185,071	186,501	186,501	186,501	186,846	186,846	186,846	187,786
S. Georgia Regulatory Liability	-	-	-	-	-	-	-	-	-	-	-	-
ARAM Regulatory Liability	-	-	-	-	-	-	-	-	-	-	-	-
Other Regulatory Liabilities	151,251	151,493	147,197	143,463	141,205	140,448	138,790	137,594	136,673	135,668	134,750	121,592
Pension and OPEB Liability	(20,326)	(21,065)	-	(23,612)	(25,192)	-	(27,654)	(28,232)	-	(28,730)	(28,909)	(18,545)
Asset Retirement Obligation	14,933	14,933	15,164	15,164	15,164	15,394	15,394	15,394	15,625	15,625	15,625	15,887
Security Deposit Affiliate	-	-	-	-	-	-	-	-	-	-	-	-
Intra Segment Security Deposit Liability	-	-	-	-	-	-	-	-	-	-	-	-
Other Deferred Credit	32,170	32,061	32,782	32,955	32,972	33,642	34,149	34,015	34,125	33,651	33,574	33,715
Total Deferred Credits	**805,880**	**808,270**	**833,464**	**817,831**	**818,170**	**845,544**	**817,951**	**818,138**	**849,727**	**825,007**	**827,573**	**830,111**
Total Capitalization and Liabilities	**2,382,299**	**2,398,506**	**2,454,198**	**2,454,672**	**2,485,931**	**2,530,906**	**2,495,147**	**2,491,230**	**2,507,973**	**2,454,850**	**2,466,929**	**2,534,289**

ASSETS	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24
Total Gross Plant	2,566,898	2,575,751	2,585,710	2,593,943	2,600,381	2,614,883	2,623,918	2,641,509	2,655,812	2,666,905	2,683,655	2,708,552
Gross Plant - Existing Assets	2,482,251	2,483,846	2,550,414	2,508,964	2,510,130	2,574,908	2,549,132	2,550,256	2,614,130	2,578,798	2,576,195	2,658,038
CWIP - Existing Assets	73,098	70,752	35,296	69,616	64,680	39,974	64,071	66,479	41,683	73,961	78,564	50,514
Gross Plant - New Additions	11,549	21,153	-	15,364	25,571	-	10,715	24,774	-	14,146	28,897	-
CWIP - New Additions	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)
Total Accumulated Depreciation	(829,658)	(833,298)	(832,800)	(836,043)	(838,516)	(840,730)	(842,857)	(846,414)	(849,541)	(850,889)	(853,311)	(852,364)
Accumulated Depreciation - Existing Assets	(829,658)	(833,298)	(832,800)	(836,043)	(838,516)	(840,730)	(842,857)	(846,414)	(849,541)	(850,889)	(853,311)	(852,364)
Accumulated Depreciation - New Additions	-	-	-	-	-	-	-	-	-	-	-	-
Net Plant	1,737,240	1,742,453	1,752,910	1,757,900	1,761,864	1,774,152	1,781,061	1,795,095	1,806,272	1,816,016	1,830,344	1,856,189
Net Plant - Existing Assets	1,725,691	1,721,300	1,752,910	1,742,537	1,736,294	1,774,152	1,770,346	1,770,321	1,806,272	1,801,870	1,801,448	1,856,189
Net Plant - New Additions	11,549	21,153	(0)	15,364	25,571	(0)	10,715	24,774	(0)	14,146	28,897	(0)
Cash	894	(638)	4,717	2,888	2,537	17,414	587	1,934	4,548	2,344	2,973	4,061
Temp Cash Investments	13,175	7,232	7,265	7,295	7,327	7,357	7,388	7,419	7,451	7,481	7,514	7,547
Notes Receivable Intercompany	-	-	-	-	-	-	-	-	-	-	-	-
Notes Receivable: Current Portion of LTD at Subs	-	-	-	-	-	-	-	-	-	-	-	-
Hedging Collateral Deposits	-	-	-	-	-	-	-	-	-	-	-	-
Accounts Receivable Intercompany	5,790	6,543	6,599	6,130	6,074	6,180	6,951	18,168	7,309	7,137	17,643	6,345
Accounts Receivable	97,178	81,849	98,850	114,383	125,695	132,116	123,468	106,045	89,786	74,950	68,531	68,456
Allowance for Doubtful Accounts	(34,445)	(35,250)	(36,538)	(37,325)	(38,356)	(39,117)	(37,459)	(34,761)	(32,043)	(29,180)	(27,374)	(25,616)
Unbilled Utility Revenue Receivable	31,689	45,670	48,265	51,065	48,856	46,571	30,305	18,735	15,032	14,439	15,947	15,521
Dividends Receivable Intercompany	-	-	-	-	-	-	-	-	-	-	-	-
Materials and Supplies	19,722	20,309	20,383	20,131	19,291	19,303	19,391	19,111	18,749	18,672	18,200	18,069
Gas Storage Inventory	41,828	35,453	26,801	15,213	11,345	8,475	9,188	11,622	14,096	16,868	26,672	34,965
Unrecovered Gas Cost	-	-	-	-	-	-	-	-	-	-	(27)	-
Prepaid Expenses and Other Current Assets	50,475	47,261	50,344	50,407	50,693	51,331	45,818	46,908	49,568	44,541	42,918	72,943
Deferred Tax Asset	-	-	-	-	-	-	-	-	-	-	-	-
Total Current Assets	**226,305**	**208,428**	**226,686**	**230,187**	**233,461**	**249,630**	**205,638**	**195,180**	**174,497**	**157,254**	**172,997**	**202,292**
Investment in Subsidiaries	-	-	-	-	-	-	-	-	-	-	-	-
Recoverable Future Taxes	63,595	64,687	66,446	68,046	69,334	70,589	71,826	73,135	74,011	74,479	74,897	73,322
Unamortized Debt Expense	3,323	3,259	3,194	3,130	3,065	3,001	2,936	2,872	2,807	2,743	2,682	2,622
Regulatory Assets	48,286	48,046	47,392	45,830	44,832	44,498	45,783	46,910	48,563	48,562	49,640	75,009
Other Deferred Charges	7,883	8,509	8,463	9,558	10,056	9,017	8,991	9,155	9,242	10,050	9,320	8,462
Other Investments	9,745	9,951	10,133	10,196	10,132	10,183	10,111	10,200	10,277	10,442	10,556	10,664
Equity Investments	-	-	-	-	-	-	-	-	-	-	-	-
Goodwill	-	-	-	-	-	-	-	-	-	-	-	-
Notes Receivable Intercompany LTD	-	-	-	-	-	-	-	-	-	-	-	-
Other Non Current Assets	152,814	153,730	185,891	156,110	158,071	198,891	160,928	161,707	204,821	162,374	162,698	170,150
Security Deposit to Affiliate	-	-	-	-	-	-	-	-	-	-	-	-
Intra Segment Security Deposit Receivable	-	-	-	-	-	-	-	-	-	-	-	-
FMV of Deriv Financial Instruments Asset	-	-	-	-	-	-	-	-	-	-	-	-
Total Non-Current Assets	**285,645**	**288,181**	**321,520**	**292,870**	**295,490**	**336,179**	**300,575**	**303,979**	**349,721**	**308,650**	**309,793**	**340,228**
Total Assets	**2,249,189**	**2,239,063**	**2,301,116**	**2,280,957**	**2,290,816**	**2,359,961**	**2,287,275**	**2,294,254**	**2,330,490**	**2,281,921**	**2,313,135**	**2,398,709**

Liabilities & Stockholders Equity	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24
Preferred Stock	-	-	-	-	-	-	-	-	-	-	-	-
Common Stock & Paid in Capital	222,926	222,926	223,924	223,924	223,924	225,141	225,141	225,141	226,282	226,282	226,282	227,617
Common Stock and Paid in Capital	-	-	-	-	-	-	-	-	-	-	-	-
Common Stock and Paid in Capital (Subs)	222,926	222,926	223,924	223,924	223,924	225,141	225,141	225,141	226,282	226,282	226,282	227,617
Retained Earnings	455,125	460,759	464,768	480,921	497,308	497,907	505,678	506,015	488,866	483,857	479,782	458,807
Accumulated Other Comprehensive Income	(8,939)	(8,939)	(8,939)	(8,939)	(8,939)	(8,939)	(8,939)	(8,939)	(8,939)	(8,939)	(8,939)	(10,097)
Accumulated Other Comprehensive Income	-	-	-	-	-	-	-	-	-	-	-	-
Accumulated Other Comprehensive Income (Subs)	(8,939)	(8,939)	(8,939)	(8,939)	(8,939)	(8,939)	(8,939)	(8,939)	(8,939)	(8,939)	(8,939)	(10,097)
Total Common Stock Equity	**669,113**	**674,747**	**679,754**	**695,907**	**712,294**	**714,110**	**721,880**	**722,217**	**706,209**	**701,200**	**697,125**	**676,327**
LIABILITIES												
Long-term portion of Total LTD	475,000	475,000	475,000	475,000	475,000	475,000	475,000	475,000	425,000	425,000	425,000	425,000
Unamortized Debt Expense Total LTD	-	-	-	-	-	-	-	-	-	-	-	-
Long-Term Debt, Net of Unamort Disc and Debt Issue Costs	-	-	-	-	-	-	-	-	-	-	-	-
Total Capitalization	**1,144,113**	**1,149,747**	**1,154,754**	**1,170,907**	**1,187,294**	**1,189,110**	**1,196,880**	**1,197,217**	**1,131,209**	**1,126,200**	**1,122,125**	**1,101,327**
Notes Payable	-	-	-	-	-	-	-	-	-	-	-	-
Notes Payable Interco	137,100	116,300	123,000	132,400	130,200	124,500	100,200	117,700	125,700	154,400	180,500	217,300
Notes Payable Intercompany	-	-	-	-	-	-	-	-	-	-	-	-
Notes Payable (Distribution to NFG)	137,100	116,300	123,000	132,400	130,200	124,500	100,200	117,700	125,700	154,400	180,500	217,300
Current Portion of Total LTD	-	-	-	-	-	-	-	-	50,000	50,000	50,000	50,000
Accounts Payable	24,844	28,306	31,972	42,870	23,403	22,867	26,296	24,687	23,623	25,072	22,621	37,778
Accounts Payable Intercompany	23,037	22,770	24,575	24,162	27,200	27,788	28,624	27,961	28,248	28,809	38,035	25,292
Amounts Payable to Customer	62,066	60,763	60,032	54,862	64,960	72,346	76,739	71,570	62,570	51,645	49,224	42,720
Dividends Payable	-	-	-	-	-	-	-	-	-	-	-	-
Dividends Payable Intercompany	-	-	11,600	-	-	11,600	-	-	11,600	-	-	13,300
Customer Advances	30,593	31,304	23,086	8,038	-	-	-	-	-	-	9,182	19,373
Customer Deposits	16,192	16,417	16,518	16,554	16,575	16,533	20,894	21,226	22,527	21,025	20,906	21,718
Reserve for Gas Replacement	-	-	1,247	8,234	14,100	20,139	15,367	10,344	6,657	3,616	712	-
Accrued State Taxes Payable	(3,764)	(3,795)	-	(3,699)	(2,708)	-	(2,137)	(3,069)	-	(5,353)	(6,782)	-
Accrued Federal Taxes Payable	1,944	1,953	-	2,888	7,585	10,154	10,489	6,877	(5,988)	(12,347)	(16,099)	-
Accrued Other Taxes Payable	(682)	89	707	1,854	3,253	1,106	1,439	2,109	(131)	524	1,415	(556)
FMV of Deriv Financial Instruments Credit	-	-	-	-	-	-	409	483	447	206	-	9
Other Current Liabilities	(0)	(0)	(0)	0	(0)	(0)	(0)	(0)	0	-	0	0
Accrued Liabilities	49,627	46,577	43,976	39,480	37,410	47,678	36,875	36,918	40,036	39,534	40,661	41,824
Total Accrued Interest	3,483	5,511	7,540	9,568	9,721	5,805	3,483	5,511	7,540	9,568	9,721	5,805
Total Current Liabilities	**344,439**	**326,197**	**344,254**	**337,212**	**331,701**	**360,516**	**318,678**	**322,317**	**372,828**	**366,699**	**400,096**	**474,564**
Total Accumulated Deferred Income Taxes	252,939	254,775	259,222	263,183	264,002	265,408	267,742	272,392	295,298	300,865	302,898	303,723
Taxes Refundable to Customer	148,688	148,326	149,524	150,154	149,093	148,833	148,575	148,346	136,328	135,452	136,498	137,938
S. Georgia Customer Refund Payable	-	-	-	-	-	-	-	-	-	-	-	-
Effective Tax Rate Chg Customer Ref Payable	-	-	-	-	-	-	-	-	-	-	-	-
ARAM Customer Refund Payable	-	-	-	-	-	-	-	-	-	-	-	-
Unamortized Investment Tax Credit	0	0	0	0	0	0	0	0	0	0	0	0
Cost of Removal Regulatory Liability	174,815	174,815	180,479	180,479	180,479	181,528	181,528	181,528	182,214	182,214	182,214	183,430
S. Georgia Regulatory Liability	-	-	-	-	-	-	-	-	-	-	-	-
ARAM Regulatory Liability	-	-	-	-	-	-	-	-	-	-	-	-
Other Regulatory Liabilities	165,543	168,160	165,633	165,769	166,050	164,668	164,724	164,451	164,028	163,514	162,918	151,089
Pension and OPEB Liability	(28,190)	(29,484)	-	(34,331)	(36,888)	-	(40,996)	(42,071)	-	(43,010)	(43,301)	-
Asset Retirement Obligation	14,715	14,715	14,942	14,942	14,942	15,170	15,170	15,170	15,397	15,397	15,397	14,933
Security Deposit Affiliate	-	-	-	-	-	-	-	-	-	-	-	-
Intra Segment Security Deposit Liability	-	-	-	-	-	-	-	-	-	-	-	-
Other Deferred Credit	32,127	31,813	32,307	32,640	34,142	34,729	34,974	34,902	33,189	34,590	34,290	31,704
Total Deferred Credits	**760,637**	**763,119**	**802,108**	**772,838**	**771,821**	**810,336**	**771,716**	**774,719**	**826,453**	**789,022**	**790,914**	**822,818**
Total Capitalization and Liabilities	**2,249,189**	**2,239,063**	**2,301,116**	**2,280,957**	**2,290,816**	**2,359,961**	**2,287,275**	**2,294,254**	**2,330,490**	**2,281,921**	**2,313,135**	**2,398,709**

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-03:

Please provide the bond rating history for the Company and, if applicable, its parent from the major credit rating agencies for the last five years.

Response:

The credit rating is held by the Parent. The Company is not rated as a standalone company.

The following security ratings of the Parent are for long-term debt at September 30:

	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
S&P	BBB-	BBB-	BBB-	BBB-	BBB-
Moody's	Baa3	Baa3	Baa3	Baa3	Baa3
Fitch	BBB	BBB	BBB	BBB	BBB

The following security ratings of the Parent are for commercial paper at September 30:

	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
S&P	A-3	A-3	A-3	A-3	A-3
Moody's	P-3	P-3	P-3	P-3	P-3
Fitch	F-2	F-2	F-2	F-2	F-2

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-04:

Please provide copies of all bond rating reports relating to the Company and, if applicable, its parent for the past two years.

Response:

Information related to the bond rating report National Fuel Gas Company is CONFIDENTIAL. The Company is providing CONFIDENTIAL Attachment ROR-004 in a separately sealed envelope that is marked “CONFIDENTIAL.” The Company hereby requests that the content of such envelope be placed in the Commission’s NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such CONFIDENTIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.

National Fuel Gas Distribution Corporation PA Division
Standard Data Request Rate of Return

Question No. ROR-05:

Please provide a workpaper showing the derivation of the Company's current AFUDC rate.

Response:

See the most recent derivation of the NFGDC AFUDC rate in the table below.

		✔✔ Estimate for Calendar 2024	Actual for Calendar 2024	Estimate for Calendar 2025
S = Average Short Term Debt (Schedule I)		$38,286,548	$34,581,848	$56,242,685
s = Short Term Debt Interest Rate (Schedule I)		6.25%	6.39%	5.09%
D = Long Term Debt (Prior Year End)		$2,400,000,000	$2,400,000,000	$2,700,000,000
d = Long Term Debt Interest Rate (Weighted Average)		4.66%	4.66%	4.79%
P = Preferred Stock (Prior Year End)		$0.00	$0.00	$0.00
p = Preferred Stock Cost Rate (Weighted Average)		0.00%	0.00%	0.00%
C = Common Equity B4 Accum. Other Comprehensive Income (Prior Year End)		$3,106,621,626	$3,106,621,626	$2,828,966,077
c = Common Equity Cost Rate (Rate Granted in Last Rate Preceedings)		8.95%	9.40%	9.40%
W = Average Balance in CWIP (13 Month Average) (Schedule II)		$38,286,548	$40,947,629	$56,242,685 [A]
Ai = Gross Allowance For Borrowed Funds Used During Construction Rate Ai = s(S/W) + (d(D/(D+P+C)) * (1-(S/W))	Ai =	6.25%	5.71%	5.09%
Ae = Allowance For Other Funds Used During Construction Rate Ae = [(1-S/W)] * [(p*(P/(D+P+C)) + (c*(C/(D+P+C))]	Ae =	0.00%	0.82%	0.00%
		6.25%	6.53%	5.09%
	Ai =	6.25%	5.71%	5.09%
	Ae =	0.00%	0.82%	0.00%
✔✔ - Per prior year workpapers./SM		6.25%	6.53%	5.09%
	Ai =	0.0006250	0.0005712	0.0005093
	Ae =	0.0000000	0.0000824	0.0000000
		0.0006250	0.0006536	0.0005093

[A] Short Term Debt balance exceeded the projected CWIP balance for the calendar year, therefore the CWIP balance has been set equal to STD balance.
STD should be used first to fund the cost of construction (CWIP), Since Short term debt exceeds the average CWIP balance it is assumed the CWIP would be fully funded by STD.

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-06:

Please supply copies of all presentations by the Company's and, if applicable, its parent's management to securities analysts during the past 2 years. This would include presentations of financial projections.

Response:

All investor presentations made by National Fuel Gas Company are archived at the following link:

https://investor.nationalfuelgas.com/news-and-events/presentations/default.aspx

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-07:

Please provide a listing of all securities issuances for the Company and, if applicable, its parent projected for the next two years. The response should identify for each projected issuance the date, dollar amount, type of security, and effective cost rate.

Response:

Please reference the Company's responses to 53.53.III.E.6 and 53.53.III.E.8 regarding anticipated company debt and equity issuances respectively for the next two years.

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-08:

Please identify all of the Company's and, if applicable, its parent's publicly underwritten common stock issuances written in the last five years. Identify which such issuances were related to mergers or acquisitions, and which were undertaken to fund facility investments in utility plant and equipment.

Response:

The information requested can be found in the Company's response to section 53.53-III-E-8.

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. GAS-ROR-09:

Please identify any plan by the Company to refinance high cost long-term debt or preferred stock.

Response:

Please see the Company's response to Section 53.53.III.E.6 for details on the projected long-term debt issuance.

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-010:

Please provide copies of all securities analysts reports relating to the Company and/or its parent issued within the past 2 years.

Response:

Information related to security analyst reports pertaining to National Fuel Gas Company is CONFIDENTIAL. The Company is providing CONFIDENTIAL Attachment ROR-010 in a separately sealed envelope that is marked "CONFIDENTIAL". The Company hereby requests that the content of such envelope be placed in the Commission's NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such CONFIDENTIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-011:

If applicable, please supply a listing of all common equity infusions from the parent to the Company over the past five years. In each case, identify date and dollar amount.

Response:

National Fuel Gas Company made an equity infusion of $50 million to the Company on August 1, 2025. That is the only equity infusion made over the past five years.

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-012:

If applicable, please identify the company's common dividend payments to its parent for each of the last five years.

Response:

See the table below for NFGDC dividend payments to its Parent.

Fiscal Year	2021	2022	2023	2024	2025
Dividend to Parent ($MM)	$44.0	$46.0	$46.4	$46.4	$54.4

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-013:

Please provide the latest year-by-year financial projections for the Company for the next five years. Also, please indicate the date these projections were prepared; whether approved by management; and whether the projections have been submitted to bond rating agencies.

Response:

Information related to the five-year forecast is CONFIDENTIAL. The Company is providing CONFIDENTIAL Attachment ROR-013 in a separately sealed envelope that is marked "CONFIDENTIAL". The Company hereby requests that the content of such envelope be placed in the Commission's NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such CONFIDENTIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.

See CONFIDENTIAL attached five-year forecast for the Company. These projections were approved by management on September 11, 2025 at the quarterly Board of Directors meeting, with certain modifications. The modifications made were necessary for ratemaking purposes and include financing updates.

These figures were not submitted for bond rating agency review.

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-014:

Please provide the Company's five-year construction budget.

Response:

See attached five-year construction budget forecast.

PA Distribution FY 2026-2030
FORECAST DETAIL

	Forecasted FY 2026	Forecasted FY 2027	Forecasted FY 2028	Forecasted FY 2029	Forecasted FY 2030
PRODUCTION PLANT					
Account 334 - Meas. & Reg. Stations	$438	$444	$415	$422	$394
PRODUCTION PLANT TOTALS	$438	$444	$415	$422	$394
TRANSMISSION PLANT					
Account 365 - Land & Land Rights	$850	$850	$850	$850	$850
Account 367 - Transmission Lines	$11,535	$14,845	$22,200	$22,800	$22,800
Account 369 - Meas. & Reg. Stations	$845	$1,305	$140	$140	$140
TRANSMISSION PLANT TOTALS	$13,230	$17,000	$23,190	$23,790	$23,790
DISTRIBUTION PLANT					
Account 374 - Land & Land Rights	$900	$900	$900	$900	$900
Account 375 - Structures & Improvements	$40	$40	$40	$40	$40
Account 376 - Distribution Mains	$30,219	$34,808	$25,837	$24,919	$25,585
Account 378 - Meas & Reg. Stations	$1,140	$870	$425	$400	$400
Account 380 - Services	$9,564	$10,995	$11,273	$11,550	$11,844
Account 381 - Measuring and Regulating Equipment	$1,704	$1,812	$1,924	$2,056	$2,180
Account 385 - Industrial Meas. & Reg. Stations	$950	$550	$550	$550	$550
DISTRIBUTION PLANT TOTALS	$44,517	$49,975	$40,948	$40,415	$41,499
GENERAL PLANT					
Account 390 - Structures and Improvements	$1,300	$1,908	$1,150	$1,500	$1,500
Account 391 - Office Furniture and Equipment	$927	$1,346	$732	$561	$539
Account 392 - Transportation Equipment	$2,402	$2,552	$2,575	$2,670	$2,846
Account 394 - Tools, Shop & Garage Equipment	$1,524	$1,234	$1,010	$854	$579
Account 396 - Power Operated Equipment	$2,700	$1,969	$1,805	$1,878	$1,953
Account 397 - Communications Equipment	$527	$291	$199	$180	$180
Account 398 - Misc. Equipment	$75	$0	$0	$0	$0
GENERAL PLANT TOTALS	$9,455	$9,300	$7,470	$7,643	$7,596
SUBTOTAL	$67,640	$76,719	$72,024	$72,269	$73,280
SPECIAL PROJECTS					
Account 391 - Office Furniture and Equipment	$549	$415	$377	$369	$354
Account 397 - Communications Equipment	$42	$24	$24	$24	$24
SPECIAL PROJECT TOTALS	$591	$439	$401	$393	$378
TOTAL	$68,232	$77,158	$72,424	$72,662	$73,658

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-015:

Please identify the Company's and, if applicable, its parent's capital structure targets (percentages of capital types). Provide the complete basis for the capital structure targets.

Response:

Capital Structures at the Company and its Parent target the mix of capital that accounts for the risk of the underlying business and provides for an adequate return to investors.

For the Company, the capital structure target falls within the range of comparable natural gas distribution companies. Please refer to the direct Testimony of Mr. Josh Nowak for further detail.

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-016:

For each month, of the most recent 24 months, please supply the Company's
a. Short-term debt balance;
b. Short-term debt interest rate;
c. Balance of construction work in progress; and
d. Balance of construction work in progress which is eligible for AFUDC accrual.

Response:

See table on page 2.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
RATE OF RETURN STANDARD DATA REQUEST

	Total Distribution Corporation		PA Distribution	
	Short Term Debt Balance	Short Term Debt Rate	Construction Work in Progress Balance	Construction Work in Progress Eligible for AFUDC Accrual
Oct-23	$137,100,000	6.13%	$29,821,392	$27,662,793
Nov-23	$116,300,000	6.11%	$30,962,235	$29,158,656
Dec-23	$123,000,000	6.13%	$10,685,671	$7,734,501
Jan-24	$132,400,000	6.15%	$23,646,390	$20,087,545
Feb-24	$130,200,000	6.14%	$23,006,505	$20,056,785
Mar-24	$124,500,000	6.08%	$11,968,772	$7,711,398
Apr-24	$100,200,000	6.50%	$20,994,638	$17,831,960
May-24	$117,700,000	6.71%	$24,249,722	$20,279,083
Jun-24	$125,700,000	6.71%	$18,270,158	$13,995,782
Jul-24	$154,400,000	6.63%	$30,414,719	$25,753,749
Aug-24	$180,500,000	6.61%	$34,479,613	$29,401,619
Sep-24	$217,300,000	6.53%	$19,131,192	$11,390,109
Oct-24	$264,200,000	5.97%	$27,793,754	$19,235,275
Nov-24	$266,800,000	5.73%	$29,167,480	$20,530,559
Dec-24	$264,100,000	5.61%	$20,787,043	$11,131,685
Jan-25	$278,200,000	5.41%	$32,268,239	$20,550,395
Feb-25	$281,000,000	5.43%	$30,876,153	$17,730,694
Mar-25	$101,200,000	5.46%	$19,025,043	$8,704,790
Apr-25	$95,400,000	5.41%	$28,014,351	$15,119,033
May-25	$111,800,000	5.50%	$29,645,197	$14,573,694
Jun-25	$166,500,000	5.58%	$18,050,603	$10,828,878
Jul-25	$193,000,000	5.57%	$28,429,653	$18,507,743
Aug-25	$168,700,000	5.60%	$30,100,125	$19,235,650
Sep-25	$191,700,000	5.47%	$24,850,177	$18,425,824

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-017:

If applicable, please provide the currently authorized returns on equity for each of the parent's utility subsidiaries of the same industry type as the Company. In each case identify the approximate date when the current return on equity was approved by the state commission.

Response:

National Fuel Gas Distribution Corporation ("NFGDC"), the utility subsidiary of National Fuel Gas Company, has operations in the states of New York and Pennsylvania. The operations of NFGDC are subject to the jurisdictions of the Pennsylvania Public Utility Commission ("PaPUC") and New York Public Service Commission ("NYPSC").

Authorized Return on Equity	Date Approved	State Commission
N/A - Black Box	July 27, 2023	PaPUC
9.70%	December 19, 2024	NYPSC

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-018:

Has the Utility reacquired or repurchased any debt within the last five years? If so, provide a summary of each gain or loss on reacquired debt, the date on which the utility commenced amortization of such a gain or loss, the regulatory commission decision addressing the treatment of such gain or loss on reacquired debt, if any, on interest expense.

Response:

National Fuel Gas Distribution Corporation ("NFGDC") has not repurchased any debt in the last five years. The $49,000,000 of notes due in 2023 and the $50,000,000 of notes due in 2025 represent the total maturities for NFGDC over the last five years, and both were retired at maturity.

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-019:

Fully identify all debt (other than instruments traded in public markets) owed to all shareholders, corporate officers, or members of the board of directors, its affiliates, parent company, or subsidiaries.

Response:

There is no debt owed to any stakeholders other than long-term publicly traded instruments, a term loan payable to banks, and commercial paper.

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-020:

Provide a summary statement of all stock dividends, splits, or par value changes during the two (2) year calendar period preceding the rate case filing.

Response:

The requested information is not applicable. There have been no stock dividends, splits, or par value changes during the last two years.

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-021:

If a claim of the filing utility is based on utilization of the capital structure or capital costs of the parent company and system—consolidated, the reasons for this claim must be fully stated and supported.

Response:
The capital structure is based on utilization of the capital structure of National Fuel Gas Distribution Company. Please see 53.53.III-E.1, III-E.30, and Statements 10 and 11 for further detail.

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-022:

To the extent not provided in SDR III.ROR.13, supply projected capital requirements and sources of the filing utility. Its parent and system—consolidated—for the test year and each of three (3) comparable future years.

Response:

Please reference the response to 53.53.III-E.5.

National Fuel Gas Distribution Corporation PA Division
Standard Data Request

Rate of Return

Question No. ROR-023:

To the extent not provided elsewhere, supply financial data of Company and/or parent for the last five (5) years.

a. Times interest earned ratio – pre and post tax basis.
b. Preferred stock dividend coverage ratio – post tax basis.
c. Times fixed charges earned ratio – pre tax basis.
d. Dividend payout ratio.
e. AFUDC as a percent of earnings available for common equity.
f. Construction work in progress as a percent of net utility plant.
g. Effective income tax rate.
h. Internal cash generations as a percent of total capital requirements.

Response:

See tables on following pages for NFG and NFGDC historical ratios.

NATIONAL FUEL GAS COMPANY - CONSOLIDATED
FINANCIAL DATA FOR FISCAL YEARS 2021-2025

	2021	2022	2023	2024	2025
a. Times Interest Earned Ratio (Pre-Tax)[1]	4.89	6.25	5.73	5.26	6.13
a. Times Interest Earned Ratio (Post_Tax)[1]	3.87	5.35	4.48	4.20	4.76
b. Preferred Stock Dividend Coverage Ratio (Post_Tax)	N/A	N/A	N/A	N/A	N/A
c. Times Fixed Charges Earned Ratio (Pre_Tax)[1]	4.72	6.03	5.40	4.90	5.71
d. Dividend Payout Ratio[2]	41.7%	31.3%	37.1%	39.9%	30.1%
e. AFUDC As A Percentage Of Earnings Available For Common Equity	1.2%	0.3%	-0.1%	0.2%	0.0%
f. Construction Work In Progress As A Percent of Net Plant	4.9%	1.8%	3.2%	2.5%	1.9%
g. Effective Income Tax Rate	23.2%	17.0%	26.40%	13.72%	26.69%
h. Internal Cash Generations As A Percent Of Total Capital Requirements	116.2%	130.6%	106.7%	117.9%	140.8%

(1) Adjusts for impact of timber sales in 2021 and adjusts calculations to exclude non-cash asset impairments
(2) Adjusted to exclude items impacting comparability

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
FINANCIAL DATA FOR FISCAL YEARS 2021-2025

	2021	2022	2023	2024	2025
a. Times Interest Earned Ratio (Pre-Tax)	5.23	4.28	2.44	2.51	2.65
a. Times Interest Earned Ratio (Post_Tax)	4.58	3.56	2.23	2.40	2.29
b. Preferred Stock Dividend Coverage Ratio (Post_Tax)	N/A	N/A	N/A	N/A	N/A
c. Times Fixed Charges Earned Ratio (Pre_Tax)	5.23	4.28	2.44	2.51	2.65
d. Dividend Payout Ratio	81.0%	66.7%	95.9%	81.3%	65.3%
e. AFUDC As A Percentage Of Earnings Available For Common Equity	0.3%	0.4%	-0.3%	0.0%	0.2%
f. Construction Work In Progress As A Percent of Net Plant	2.8%	1.8%	2.4%	2.7%	2.5%
g. Effective Income Tax Rate	15.2%	21.7%	14.73%	7.52%	22.03%
h. Internal Cash Generations As A Percent Of Total Capital Requirements	110.7%	137.4%	82.8%	92.5%	106.2%

SUPPLEMENTAL DATA REQUESTS

REVENUE REQUIREMENT

National Fuel Gas Distribution Corporation PA Division

Standard Data Request

Revenue Requirement

Question No. RR-01:

1. Please provide a copy of the Company's detailed quarterly balance sheet for the historic test year through the most recent month available.

1. A Please provide a copy of the Company's detailed monthly income statements for the historic test year through the most recent month available.

Response:

See pages 2 through 5 for the quarterly detailed balance sheet of National Fuel Gas Distribution Corporation as of December 31, 2024, March 31, 2025, July 31, 2025, and September 30, 2025.

See pages 6 through 11 for the monthly income statements of National Fuel Gas Distribution Corporation’s Pennsylvania Division through the month ended September 30, 2025.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
BALANCE SHEET AS OF

	December 31, 2024	March 31, 2025
Assets		
Property Plant and Equipment		
Gas Plant In Service	$ 2,670,098,264.83	$ 2,706,303,867.32
Completed Construction Not Classified	0.00	0.00
Construction Work In Progress	66,987,929.15	65,993,264.40
Non Utility	1,162,034.01	1,162,034.01
Total Property Plant and Equipment	**2,738,248,228.00**	**2,773,459,165.74**
Less: Reserve For Deprec, Depl & Amort	1,057,374,104.04	1,069,412,493.23
Net Property Plant and Equipment	**1,680,874,123.95**	**1,704,046,672.50**
Current Assets		
Cash	2,411,715.60	7,401,550.69
Temporary Cash Investments	1,595,203.25	1,610,980.59
Notes Receivable	1,516,733.50	1,473,318.40
Notes Receivable - Associate Companies	0.00	0.00
Accounts Receivable - Associate Companies	7,365,587.39	6,865,851.48
Accounts Receivable - Customers	30,736,348.16	104,591,022.17
Accounts Receivable - Others	5,731,144.21	6,410,090.12
Gas Stored Underground - Current	24,634,425.20	6,413,310.55
Unbilled Revenue	57,116,577.36	49,077,400.21
Materials & Supplies	18,380,915.77	18,576,382.42
Prepayments	12,923,137.90	15,094,833.31
Derivative Instrument Assets	0.00	0.00
Total Current Assets	**162,411,788.34**	**217,514,739.94**
Other Assets		
Other Investments	151,382,027.81	151,321,850.42
Deferred Gas Costs	-42,463,126.24	-30,576,650.80
Accumulated Deferred Income Taxes	0.00	0.00
Recoverable of Future Taxes	77,007,324.91	81,920,169.91
Unamortized Debt Expense	2,441,119.47	2,260,217.04
Other Regulatory Assets	114,043,291.53	110,614,479.46
Other Deferred Debits	-532,328.05	-759,316.12
Total Other Assets	**301,878,309.43**	**314,780,749.91**
Total Assets	**$ 2,145,164,221.73**	**$ 2,236,342,162.36**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
BALANCE SHEET AS OF

	December 31, 2024	March 31, 2025
Liabilities & Stockholders Equity		
Common Capital Stock		
Shares Issued & Outstanding	$ 59,170,600.00	$ 59,170,600.00
Premium on Capital Stock	68,500.00	68,500.00
Donations Received	169,345,728.36	170,614,597.00
Total Common Capital Stock	**228,584,828.36**	**229,853,697.00**
Retained Earnings		
Retained Earnings Balance as of Oct 1 st	458,809,261.70	458,809,261.70
Net Income or Loss (-)	32,499,060.90	96,042,751.60
Less: Dividends	13,300,000.00	26,600,000.00
Total Retained Earnings	**478,008,322.60**	**528,252,013.30**
Accrued Other Comprehensive Income/Loss	(10,096,681.00)	(10,096,681.00)
Total Stockholders Equity	**696,496,469.96**	**748,009,029.30**
Long Term Debt		
Advance From Associate Companies	425,000,000.00	600,000,000.00
Other Long Term Debt	0.00	0.00
Total Long Term Debt	**425,000,000.00**	**600,000,000.00**
Total Capitalization	**1,121,496,469.96**	**1,348,009,029.30**
Current & Accrued Liabilities		
Notes Payable - Associate Companies	314,100,000.00	151,200,000.00
Accounts Payable - Associate Companies	32,925,830.71	31,301,312.24
Accounts Payable - Others	41,381,374.12	43,091,151.76
Customer Deposits	20,210,290.78	18,219,198.24
Federal Income Taxes	-18,285,769.75	-13,674,411.75
Other Accrued Taxes	-7,674,563.62	-6,194,713.81
Dividends Declared	13,300,000.00	13,300,000.00
Tax Collections Payable	3,097,466.31	3,181,707.91
Customer Advances	570,191.07	677,339.41
Accrued Interest	250,423.99	396,685.26
Other Accruals	13,888,505.57	16,644,584.74
Supplier Refunds Payable	30,484.61	-225,751.92
Reserve For Gas Replacement	1,316,498.36	27,613,911.45
Derivative Instrument Liabilities	0.00	0.00
Total Current & Accrued Liabilities	**415,110,732.15**	**285,531,013.53**
Operating Reserves		
Accumulated Deferred Income Taxes	316,393,338.49	332,985,576.49
Accumulated Deferred Investment Tax Credit	3.41	3.41
Asset Retirement Obligations	15,163,617.00	15,394,137.00
Other Deferred Credits	274,368,202.72	251,819,964.63
Reserve For Injuries & Damages	2,631,858.00	2,602,438.00
Total Operating Reserves	**608,557,019.62**	**602,802,119.53**
Total Liabilities	**1,023,667,751.77**	**888,333,133.06**
Total Liabilities & Equity	**$ 2,145,164,221.73**	**$ 2,236,342,162.36**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
BALANCE SHEET AS OF

	June 30, 2025	September 30, 2025
Assets		
Property Plant and Equipment		
Gas Plant In Service	$ 2,769,167,942.21	$ 2,812,782,009.29
Completed Construction Not Classified	0.00	0.00
Construction Work In Progress	41,393,702.04	49,837,689.82
Non Utility	1,162,034.01	1,162,034.01
Total Property Plant and Equipment	**2,811,723,678.27**	**2,863,781,733.13**
Less: Reserve For Deprec, Depl & Amort	1,077,405,212.04	1,087,621,261.91
Net Property Plant and Equipment	**1,734,318,466.22**	**1,776,160,471.21**
Current Assets		
Cash	8,579,992.99	6,239,194.60
Temporary Cash Investments	1,626,826.27	8,642,762.15
Notes Receivable	1,425,146.19	1,316,801.92
Notes Receivable - Associate Companies	0.00	0.00
Accounts Receivable - Associate Companies	10,012,977.49	9,698,072.38
Accounts Receivable - Customers	70,735,069.32	21,734,505.49
Accounts Receivable - Others	6,280,094.05	8,192,059.02
Gas Stored Underground - Current	12,809,807.35	33,467,810.07
Unbilled Revenue	15,347,429.25	16,218,915.86
Materials & Supplies	18,695,642.36	18,927,354.76
Prepayments	12,231,910.73	12,119,196.57
Derivative Instrument Assets	0.00	0.00
Total Current Assets	**157,744,896.00**	**136,556,672.82**
Other Assets		
Other Investments	152,003,842.83	131,062,001.75
Deferred Gas Costs	-20,708,594.32	5,769,456.08
Accumulated Deferred Income Taxes	0.00	0.00
Recoverable of Future Taxes	83,820,085.91	82,608,825.91
Unamortized Debt Expense	2,079,314.61	1,898,412.18
Other Regulatory Assets	108,883,443.87	122,535,580.95
Other Deferred Debits	571,036.89	707,814.57
Total Other Assets	**326,649,129.79**	**344,582,091.44**
Total Assets	**$ 2,218,712,492.02**	**$ 2,257,299,235.48**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
BALANCE SHEET AS OF

	June 30, 2025	September 30, 2025
Liabilities & Stockholders Equity		
Common Capital Stock		
Shares Issued & Outstanding	$ 59,170,600.00	$ 59,170,600.00
Premium on Capital Stock	68,500.00	68,500.00
Donations Received	171,790,137.41	222,509,559.17
Total Common Capital Stock	**231,029,237.41**	**281,748,659.17**
Retained Earnings		
Retained Earnings Balance as of Oct 1 st	458,809,261.70	458,809,261.70
Net Income or Loss (-)	101,039,724.19	83,249,363.74
Less: Dividends	41,100,000.00	55,600,000.00
Total Retained Earnings	**518,748,985.89**	**486,458,625.44**
Accrued Other Comprehensive Income/Loss	(10,096,681.00)	(12,749,624.00)
Total Stockholders Equity	**739,681,542.30**	**755,457,660.61**
Long Term Debt		
Advance From Associate Companies	600,000,000.00	600,000,000.00
Other Long Term Debt	0.00	0.00
Total Long Term Debt	**600,000,000.00**	**600,000,000.00**
Total Capitalization	**1,339,681,542.30**	**1,355,457,660.61**
Current & Accrued Liabilities		
Notes Payable - Associate Companies	166,500,000.00	191,700,000.00
Accounts Payable - Associate Companies	34,573,399.57	28,571,422.19
Accounts Payable - Others	31,436,218.79	39,775,844.07
Customer Deposits	16,634,885.46	16,435,696.09
Federal Income Taxes	-19,709,671.75	-20,880,560.75
Other Accrued Taxes	-8,368,641.41	-9,779,296.45
Dividends Declared	14,500,000.00	14,500,000.00
Tax Collections Payable	2,239,483.87	1,459,433.52
Customer Advances	674,535.49	557,409.43
Accrued Interest	465,939.09	0.00
Other Accruals	22,469,963.38	25,887,059.69
Supplier Refunds Payable	-444,550.41	-661,744.15
Reserve For Gas Replacement	12,706,191.24	0.00
Derivative Instrument Liabilities	445,039.11	70,992.91
Total Current & Accrued Liabilities	**274,122,792.43**	**287,636,256.55**
Operating Reserves		
Accumulated Deferred Income Taxes	340,527,051.49	351,106,698.49
Accumulated Deferred Investment Tax Credit	3.41	3.41
Asset Retirement Obligations	15,624,657.00	15,887,152.00
Other Deferred Credits	246,154,007.39	244,740,986.42
Reserve For Injuries & Damages	2,602,438.00	2,470,478.00
Total Operating Reserves	**604,908,157.29**	**614,205,318.32**
Total Liabilities	**879,030,949.72**	**901,841,574.87**
Total Liabilities & Equity	**$ 2,218,712,492.02**	**$ 2,257,299,235.48**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
INCOME STATEMENT FOR THE MONTHS ENDING

	October 31, 2024	November 30, 2024
Gas Revenues	$ 10,885,957.88	$ 16,374,799.04
Less: Purchased Gas Sold	4,337,904.98	7,703,304.14
Revenue Taxes	0.00	0.00
Net Gas Revenues	**6,548,052.90**	**8,671,494.90**
Transportation Revenues	2,923,648.93	3,870,092.15
Less: Purchased Gas Sold	160,673.00	261,698.00
Revenue Taxes	0.00	0.00
Net Transportations Revenue	**2,762,975.93**	**3,608,394.15**
Other Operating Revenues	86,803.44	113,661.38
Total Net Revenues	**9,397,832.27**	**12,393,550.43**
Operating Revenue Deductions:		
Operation Expense	4,663,837.28	5,000,832.64
Maintenance Expense	106,332.74	600,287.66
Depletion, Depreciation & Amortization	1,454,011.47	1,531,534.14
Income Tax Federal - Current	(19,311.00)	(534,644.00)
Income Tax State - Current	0.00	0.00
Provision For Deferred Income Tax	(182,901.00)	790,821.00
Investment Tax Credit	0.00	0.00
Other Taxes	167,155.22	225,432.84
Total Operating Revenue Deductions	**6,189,124.71**	**7,614,264.28**
Operating Income/(-)Loss	**3,208,707.56**	**4,779,286.15**
Other Income:		
Interest	56,806.57	54,230.56
AFUDC	0.00	0.00
Miscellaneous	(97,072.08)	65,313.95
Investment Tax Credit	0.00	0.00
Total Other Income	**(40,265.51)**	**119,544.51**
Gross Income/(-)Loss	**3,168,442.05**	**4,898,830.66**
Other Deductions:		
Interest - Associate Companies	982,228.13	987,672.82
Interest - Other	76,609.26	76,542.08
Interest - Borrowed Funds During Const.	(24,902.35)	(25,037.55)
Miscellaneous	23,081.75	29,888.78
Total Other Deductions	**1,057,016.79**	**1,069,066.13**
Taxes On Other Income & Deductions:		
Federal - Current	(13,303.00)	18,828.00
State - Current	0.00	0.00
Provision For Deferred Income Taxes	0.00	0.00
Miscellaneous Other Taxes	0.00	0.00
Total Taxes On Other Income & Deductions	**(13,303.00)**	**18,828.00**
Net Income/(-)Loss	**$ 2,124,728.26**	**$ 3,810,936.53**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
INCOME STATEMENT FOR THE MONTHS ENDING

	December 31, 2024	January 31, 2025
Gas Revenues	$ 25,201,661.05	$ 32,136,627.78
Less: Purchased Gas Sold	13,757,802.24	18,315,050.48
Revenue Taxes	0.00	0.00
Net Gas Revenues	**11,443,858.81**	**13,821,577.30**
Transportation Revenues	5,244,194.22	6,812,468.42
Less: Purchased Gas Sold	395,026.00	568,397.00
Revenue Taxes	0.00	0.00
Net Transportations Revenue	**4,849,168.22**	**6,244,071.42**
Other Operating Revenues	134,492.63	157,990.08
Total Net Revenues	**16,427,519.66**	**20,223,638.80**
Operating Revenue Deductions:		
Operation Expense	5,945,985.05	5,877,866.30
Maintenance Expense	340,191.67	402,840.28
Depletion, Depreciation & Amortization	1,641,901.71	1,430,747.51
Income Tax Federal - Current	130,012.00	(913,246.00)
Income Tax State - Current	0.00	0.00
Provision For Deferred Income Tax	873,882.00	2,657,904.00
Investment Tax Credit	0.00	0.00
Other Taxes	194,998.71	296,563.46
Total Operating Revenue Deductions	**9,126,971.14**	**9,752,675.55**
Operating Income/(-)Loss	**7,300,548.52**	**10,470,963.25**
Other Income:		
Interest	47,138.61	42,413.35
AFUDC	0.00	0.00
Miscellaneous	(21,401.08)	75,059.54
Investment Tax Credit	0.00	0.00
Total Other Income	**25,737.53**	**117,472.89**
Gross Income/(-)Loss	**7,326,286.05**	**10,588,436.14**
Other Deductions:		
Interest - Associate Companies	985,615.73	984,833.05
Interest - Other	108,002.65	64,429.86
Interest - Borrowed Funds During Const.	(24,706.26)	(18,800.50)
Miscellaneous	44,398.81	78,308.57
Total Other Deductions	**1,113,310.93**	**1,108,770.98**
Taxes On Other Income & Deductions:		
Federal - Current	40,387.00	5,547.00
State - Current	0.00	0.00
Provision For Deferred Income Taxes	(50,272.00)	9,820.00
Miscellaneous Other Taxes	0.00	0.00
Total Taxes On Other Income & Deductions	**(9,885.00)**	**15,367.00**
Net Income/(-)Loss	**$ 6,222,860.12**	**$ 9,464,298.16**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
INCOME STATEMENT FOR THE MONTHS ENDING

	February 28, 2025	March 31, 2025
Gas Revenues	$ 31,918,116.00	$ 25,333,210.05
Less: Purchased Gas Sold	18,955,015.12	13,607,966.61
Revenue Taxes	0.00	0.00
Net Gas Revenues	**12,963,100.88**	**11,725,243.44**
Transportation Revenues	6,639,583.23	5,138,031.35
Less: Purchased Gas Sold	677,311.00	564,366.00
Revenue Taxes	0.00	0.00
Net Transportations Revenue	**5,962,272.23**	**4,573,665.35**
Other Operating Revenues	170,649.94	168,605.18
Total Net Revenues	**19,096,023.05**	**16,467,513.97**
Operating Revenue Deductions:		
Operation Expense	5,267,191.22	6,941,757.92
Maintenance Expense	432,415.30	371,868.09
Depletion, Depreciation & Amortization	1,554,834.51	1,702,743.15
Income Tax Federal - Current	922,677.00	765,254.00
Income Tax State - Current	0.00	164,614.00
Provision For Deferred Income Tax	683,494.00	(42,747.00)
Investment Tax Credit	0.00	0.00
Other Taxes	183,378.04	166,188.80
Total Operating Revenue Deductions	**9,043,990.07**	**10,069,678.96**
Operating Income/(-)Loss	**10,052,032.98**	**6,397,835.01**
Other Income:		
Interest	44,052.82	42,591.07
AFUDC	45,674.45	0.00
Miscellaneous	90,748.69	54,758.58
Investment Tax Credit	0.00	0.00
Total Other Income	**180,475.96**	**97,349.65**
Gross Income/(-)Loss	**10,232,508.94**	**6,495,184.66**
Other Deductions:		
Interest - Associate Companies	953,368.83	1,018,190.47
Interest - Other	126,694.27	130,611.56
Interest - Borrowed Funds During Const.	34,975.40	(10,020.41)
Miscellaneous	35,975.83	61,029.77
Total Other Deductions	**1,151,014.33**	**1,199,811.39**
Taxes On Other Income & Deductions:		
Federal - Current	14,224.00	7,496.00
State - Current	0.00	1,406.00
Provision For Deferred Income Taxes	15,665.00	(159.00)
Miscellaneous Other Taxes	0.00	0.00
Total Taxes On Other Income & Deductions	**29,889.00**	**8,743.00**
Net Income/(-)Loss	**$ 9,051,605.61**	**$ 5,286,630.27**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
INCOME STATEMENT FOR THE MONTHS ENDING

	April 30, 2025	May 31, 2025
Gas Revenues	$ 17,958,103.44	$ 10,201,394.43
Less: Purchased Gas Sold	9,013,659.72	4,937,973.21
Revenue Taxes	0.00	0.00
Net Gas Revenues	**8,944,443.72**	**5,263,421.22**
Transportation Revenues	3,946,747.55	2,566,539.54
Less: Purchased Gas Sold	435,338.00	307,153.00
Revenue Taxes	0.00	0.00
Net Transportations Revenue	**3,511,409.55**	**2,259,386.54**
Other Operating Revenues	135,855.35	121,955.40
Total Net Revenues	**12,591,708.62**	**7,644,763.16**
Operating Revenue Deductions:		
Operation Expense	5,053,649.15	5,032,210.81
Maintenance Expense	409,240.43	272,921.92
Depletion, Depreciation & Amortization	1,542,041.39	1,614,186.63
Income Tax Federal - Current	(252,771.00)	(369,864.00)
Income Tax State - Current	114,378.00	(130,861.00)
Provision For Deferred Income Tax	532,912.00	(314,751.00)
Investment Tax Credit	0.00	0.00
Other Taxes	186,616.59	164,586.24
Total Operating Revenue Deductions	**7,586,066.56**	**6,268,429.60**
Operating Income/(-)Loss	**5,005,642.06**	**1,376,333.56**
Other Income:		
Interest	38,780.45	50,892.15
AFUDC	0.00	0.00
Miscellaneous	43,986.63	(15,875.82)
Investment Tax Credit	0.00	0.00
Total Other Income	**82,767.08**	**35,016.33**
Gross Income/(-)Loss	**5,088,409.14**	**1,411,349.89**
Other Deductions:		
Interest - Associate Companies	1,017,061.52	1,021,159.75
Interest - Other	88,037.32	108,205.55
Interest - Borrowed Funds During Const.	(1,556.89)	(6,285.55)
Miscellaneous	42,114.29	24,247.30
Total Other Deductions	**1,145,656.24**	**1,147,327.05**
Taxes On Other Income & Deductions:		
Federal - Current	259.00	10,580.00
State - Current	762.00	(837.00)
Provision For Deferred Income Taxes	7,888.00	(7,912.00)
Miscellaneous Other Taxes	0.00	0.00
Total Taxes On Other Income & Deductions	**8,909.00**	**1,831.00**
Net Income/(-)Loss	**$ 3,933,843.90**	**$ 262,191.84**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
INCOME STATEMENT FOR THE MONTHS ENDING

	June 30, 2025	July 31, 2025
Gas Revenues	$ 5,219,688.33	$ 5,084,147.57
Less: Purchased Gas Sold	1,258,037.61	1,343,745.45
Revenue Taxes	0.00	0.00
Net Gas Revenues	**3,961,650.72**	**3,740,402.12**
Transportation Revenues	1,967,500.86	1,902,615.17
Less: Purchased Gas Sold	207,182.00	151,086.00
Revenue Taxes	0.00	0.00
Net Transportations Revenue	**1,760,318.86**	**1,751,529.17**
Other Operating Revenues	99,758.11	86,702.09
Total Net Revenues	**5,821,727.69**	**5,578,633.38**
Operating Revenue Deductions:		
Operation Expense	6,349,549.97	5,072,823.16
Maintenance Expense	336,696.05	398,564.11
Depletion, Depreciation & Amortization	1,773,987.60	1,462,135.74
Income Tax Federal - Current	(1,145,831.00)	(1,280,863.00)
Income Tax State - Current	(148,131.00)	0.00
Provision For Deferred Income Tax	(13,377.00)	115,727.00
Investment Tax Credit	0.00	0.00
Other Taxes	169,128.75	196,755.33
Total Operating Revenue Deductions	**7,322,023.37**	**5,965,142.34**
Operating Income/(-)Loss	**(1,500,295.68)**	**(386,508.96)**
Other Income:		
Interest	41,757.28	36,551.95
AFUDC	0.00	0.00
Miscellaneous	45,895.86	66,394.13
Investment Tax Credit	0.00	0.00
Total Other Income	**87,653.14**	**102,946.08**
Gross Income/(-)Loss	**(1,412,642.54)**	**(283,562.88)**
Other Deductions:		
Interest - Associate Companies	1,035,815.68	1,056,794.39
Interest - Other	159,699.49	112,508.07
Interest - Borrowed Funds During Const.	(3,717.90)	(18,218.16)
Miscellaneous	11,853.06	17,583.67
Total Other Deductions	**1,203,650.33**	**1,168,667.97**
Taxes On Other Income & Deductions:		
Federal - Current	5,132.00	26,130.00
State - Current	(1,331.00)	0.00
Provision For Deferred Income Taxes	10,753.00	(7,972.00)
Miscellaneous Other Taxes	0.00	0.00
Total Taxes On Other Income & Deductions	**14,554.00**	**18,158.00**
Net Income/(-)Loss	**$ (2,630,846.87)**	**$ (1,470,388.85)**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
INCOME STATEMENT FOR THE MONTHS ENDING

	August 31, 2025	September 30, 2025
Gas Revenues	$ 7,051,320.57	$ 5,751,104.52
Less: Purchased Gas Sold	2,661,379.23	2,281,634.37
Revenue Taxes	0.00	0.00
Net Gas Revenues	**4,389,941.34**	**3,469,470.15**
Transportation Revenues	2,336,428.10	1,813,066.57
Less: Purchased Gas Sold	141,922.00	175,677.00
Revenue Taxes	0.00	0.00
Net Transportations Revenue	**2,194,506.10**	**1,637,389.57**
Other Operating Revenues	93,584.89	92,871.62
Total Net Revenues	**6,678,032.33**	**5,199,731.34**
Operating Revenue Deductions:		
Operation Expense	4,936,605.55	6,352,988.05
Maintenance Expense	388,038.63	451,842.37
Depletion, Depreciation & Amortization	1,615,631.10	1,919,992.76
Income Tax Federal - Current	(956,609.00)	906,063.00
Income Tax State - Current	9,441.00	(20.00)
Provision For Deferred Income Tax	155,223.00	212,381.00
Investment Tax Credit	0.00	0.00
Other Taxes	38,788.95	161,847.42
Total Operating Revenue Deductions	**6,187,119.23**	**10,005,094.60**
Operating Income/(-)Loss	**490,913.10**	**(4,805,363.26)**
Other Income:		
Interest	102,271.93	105,296.66
AFUDC	0.00	0.00
Miscellaneous	79,895.20	121,917.74
Investment Tax Credit	0.00	0.00
Total Other Income	**182,167.13**	**227,214.40**
Gross Income/(-)Loss	**673,080.23**	**(4,578,148.86)**
Other Deductions:		
Interest - Associate Companies	1,022,420.18	1,045,694.61
Interest - Other	(110,227.68)	(31,144.92)
Interest - Borrowed Funds During Const.	(24,401.38)	(51,280.26)
Miscellaneous	18,026.92	45,353.85
Total Other Deductions	**905,818.04**	**1,008,623.28**
Taxes On Other Income & Deductions:		
Federal - Current	17,981.00	(1,473.00)
State - Current	162.00	20.00
Provision For Deferred Income Taxes	15,989.00	(35,088.00)
Miscellaneous Other Taxes	0.00	0.00
Total Taxes On Other Income & Deductions	**34,132.00**	**(36,541.00)**
Net Income/(-)Loss	**$ (266,869.81)**	**$ (5,550,231.14)**

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-02:

Please provide the actual number of customers by rate schedule as of December 31 for the last five years.

Response:

Please see Attachment RR-02.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Actual Accounts
December of Revenue Year

	Actuals				
	2020	**2021**	**2022**	**2023**	**2024**
Retail Sales			Dec 2019	Dec 2020	Dec 2021
Residential	178,405	179,549	179,584	180,400	178,815
Commercial	10,814	10,941	11,140	11,030	11,156
Industrial	179	178	175	178	190
Public Authority	646	641	649	577	595
Total Retail Sales	**190,044**	**191,309**	**191,548**	**192,185**	**190,756**
Transportation Service					
Residential MMT Transportation	336	344	353	504	560
Commercial MMT Transportation	2,638	2,721	2,628	2,789	2,799
Industrial MMT Transportation	338	342	341	340	338
Public Authority MMT Transportation	488	492	487	556	563
Total MMT Service	**3,800**	**3,899**	**3,809**	**4,189**	**4,260**
Residential SATC Transportation	18,958	17,420	17,166	16,181	17,622
Commercial SATC Transportation	1,452	1,331	1,249	1,195	1,097
Industrial SATC Transportation	20	19	19	17	14
Public Authority SATC Transportation	62	66	62	59	44
Total SATC Service	**20,492**	**18,836**	**18,496**	**17,452**	**18,777**
Residential DMT Transportation (CTS)					
Commercial DMT Transportation (CTS)	13	13	13	13	12
Industrial DMT Transportation (CTS)	63	61	60	61	64
Public Authority DMT Transportation (CTS)	2	2	2	2	2
Total DMT Service	**78**	**76**	**75**	**76**	**78**
Residential Transportation Service	19,294	17,764	17,519	16,685	18,182
Commercial Transportation Service	4,103	4,065	3,890	3,997	3,908
Industrial Transportation Service	421	422	420	418	416
Public Authority Transportation Service	552	560	551	617	609
Total Transportation Requirements	**24,370**	**22,811**	**22,380**	**21,717**	**23,115**
Total Requirements	**214,414**	**214,120**	**213,928**	**213,902**	**213,871**

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-03:

Please provide the average number of customers by rate schedule for the last five years.

Response:

Please see Attachment RR-03.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Actual Accounts
Average of Revenue Year

	Actuals				
	10/2020 - 09/2021	10/2021 - 09/2022	10/2022 - 09/2023	10/2023 - 09/2024	10/2024 - 09/2025
Retail Sales	Avg18	Avg19	Avg20	Avg21	Avg22
Residential	178,220	179,173	179,425	179,859	177,998
Commercial	10,772	10,969	11,049	11,028	11,194
Industrial	173	178	177	177	185
Public Authority	642	648	618	580	597
Total Retail Sales	**189,807**	**190,967**	**191,270**	**191,644**	**189,973**
Transportation Service					
Residential MMT Transportation	332	361	406	522	561
Commercial MMT Transportation	2,670	2,682	2,703	2,793	2,762
Industrial MMT Transportation	339	338	338	339	336
Public Authority MMT Transportation	488	490	517	559	567
Total MMT Service	**3,829**	**3,870**	**3,964**	**4,212**	**4,225**
Residential SATC Transportation	18,359	17,410	16,859	16,477	18,052
Commercial SATC Transportation	1,417	1,293	1,220	1,159	1,051
Industrial SATC Transportation	20	18	19	16	14
Public Authority SATC Transportation	61	64	59	56	40
Total SATC Service	**19,857**	**18,785**	**18,157**	**17,707**	**19,157**
Residential DMT Transportation (CTS)					
Commercial DMT Transportation (CTS)	13	12	13	13	11
Industrial DMT Transportation (CTS)	62	61	61	63	64
Public Authority DMT Transportation (CTS)	2	2	2	2	2
Total DMT Service	**77**	**76**	**75**	**78**	**78**
Residential Transportation Service	18,691	17,771	17,266	16,999	18,614
Commercial Transportation Service	4,100	3,987	3,936	3,965	3,824
Industrial Transportation Service	421	417	418	417	414
Public Authority Transportation Service	551	556	578	616	608
Total Transportation Requirements	**23,763**	**22,731**	**22,196**	**21,997**	**23,459**
Total Requirements	**213,570**	**213,698**	**213,466**	**213,641**	**213,433**

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-04:

Please provide the actual number of customers by rate schedule at the end of each month from the commencement of the historic test year through the most recent month available and update as additional data become available.

Response:

Please see Attachment RR-04.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Actual Accounts - Monthly

	Actuals (HTY)												Actuals since HTY	
Retail Sales	**Oct-24**	**Nov-24**	**Dec-24**	**Jan-25**	**Feb-25**	**Mar-25**	**Apr-25**	**May-25**	**Jun-25**	**Jul-25**	**Aug-25**	**Sep-25**	**Oct-25**	**Nov-25**
Residential	177,917	178,287	178,815	179,183	179,155	179,115	178,784	177,999	177,358	176,772	176,382	176,212	176,489	177,153
Commercial	10,968	11,048	11,156	11,252	11,318	11,367	11,344	11,308	11,181	11,154	11,119	11,111	11,095	11,209
Industrial	178	183	190	186	187	188	189	187	185	183	178	180	184	187
Public Authority	586	591	595	599	599	601	600	605	600	595	593	595	591	597
Total Retail Sales	**189,649**	**190,109**	**190,756**	**191,220**	**191,259**	**191,271**	**190,917**	**190,099**	**189,324**	**188,704**	**188,272**	**188,098**	**188,359**	**189,146**
Transportation Service														
Residential MMT Transportation	567	562	560	555	557	555	560	568	565	565	562	561	559	558
Commercial MMT Transportation	2,788	2,801	2,799	2,790	2,770	2,737	2,733	2,705	2,762	2,755	2,755	2,744	2,737	2,726
Industrial MMT Transportation	339	337	338	337	337	336	335	335	335	333	333	332	330	331
Public Authority MMT Transportation	567	562	563	565	565	568	568	566	569	569	569	567	568	568
Total MMT Service	**4,261**	**4,262**	**4,260**	**4,247**	**4,229**	**4,196**	**4,196**	**4,174**	**4,231**	**4,222**	**4,219**	**4,204**	**4,194**	**4,183**
Residential SATC Transportation	17,190	17,379	17,622	17,897	18,162	18,308	18,321	18,354	18,378	18,365	18,300	18,349	18,278	18,256
Commercial SATC Transportation	1,108	1,096	1,097	1,088	1,081	1,071	1,058	1,032	1,009	1,002	989	976	981	978
Industrial SATC Transportation	13	13	14	14	14	15	15	15	15	14	14	14	14	14
Public Authority SATC Transportation	45	45	44	43	43	43	39	35	35	35	35	35	35	35
Total SATC Service	**18,356**	**18,533**	**18,777**	**19,042**	**19,300**	**19,437**	**19,433**	**19,436**	**19,437**	**19,416**	**19,338**	**19,374**	**19,308**	**19,283**
Residential DMT Transportation (CTS)														
Commercial DMT Transportation (CTS)	12	12	12	12	12	10	11	11	11	11	11	11	11	11
Industrial DMT Transportation (CTS)	64	64	64	64	64	65	64	64	64	65	65	65	65	65
Public Authority DMT Transportation (CTS)	2	2	2	2	2	2	2	2	2	2	2	2	2	2
Total DMT Service	**78**	**78**	**78**	**78**	**78**	**77**	**77**	**77**	**77**	**78**	**78**	**78**	**78**	**78**
Residential Transportation Service	17,757	17,941	18,182	18,452	18,719	18,863	18,881	18,922	18,943	18,930	18,862	18,910	18,837	18,814
Commercial Transportation Service	3,908	3,909	3,908	3,890	3,863	3,818	3,802	3,748	3,782	3,768	3,755	3,731	3,729	3,715
Industrial Transportation Service	416	414	416	415	415	416	414	414	414	412	412	411	409	410
Public Authority Transportation Service	614	609	609	610	610	613	609	603	606	606	606	604	605	605
Total Transportation Requirements	**22,695**	**22,873**	**23,115**	**23,367**	**23,607**	**23,710**	**23,706**	**23,687**	**23,745**	**23,716**	**23,635**	**23,656**	**23,580**	**23,544**
Total Requirements	**212,344**	**212,982**	**213,871**	**214,587**	**214,866**	**214,981**	**214,623**	**213,786**	**213,069**	**212,420**	**211,907**	**211,754**	**211,939**	**212,690**

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-05:

If past weather normalized sales or sales trends are used in models or otherwise relied on in reaching sales projections, please provide actual and normalized throughput by rate schedule as of December 31 for the last three years. Where applicable, separately identify sales and transportation throughput.

Response:

Please see Attachment RR-05.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Actual and Normalized Consumption
December of Revenue Year

	Actual			Normalized		
	2022	**2023**	**2024**	**2022**	**2023**	**2024**
Retail Sales	Dec 2019	Dec 2020	Dec 2021	Dec 2019	Dec 2020	Dec 2021
Residential	2,397,593	2,129,797	2,324,604	2,263,105	2,243,282	2,309,933
Commercial	395,748	341,463	375,063	375,478	357,361	376,720
Industrial	31,920	25,442	28,586	31,920	25,442	28,586
Public Authority	31,025	23,237	25,214	29,366	24,293	26,115
Total Retail Sales	**2,856,287**	**2,519,939**	**2,753,467**	**2,699,869**	**2,650,378**	**2,741,354**
Transportation Service						
Residential MMT Transportation	27,456	27,633	26,790	26,710	27,486	30,032
Commercial MMT Transportation	387,203	375,923	363,439	377,041	376,371	403,852
Industrial MMT Transportation	298,906	347,955	263,477	298,906	347,955	263,477
Public Authority MMT Transportation	204,424	201,113	175,166	202,793	193,546	214,977
Total MMT Service	**917,989**	**952,624**	**828,873**	**905,450**	**945,358**	**912,338**
Residential SATC Transportation	236,593	195,733	232,795	223,339	206,280	231,608
Commercial SATC Transportation	42,243	39,512	41,214	40,000	41,329	41,334
Industrial SATC Transportation	1,873	2,423	1,189	1,873	2,423	1,189
Public Authority SATC Transportation	2,290	2,029	1,837	2,149	2,133	1,850
Total SATC Service	**282,999**	**239,696**	**277,035**	**267,361**	**252,165**	**275,981**
Residential DMT Transportation (CTS)						
Commercial DMT Transportation (CTS)	67,006	70,886	62,269	67,006	69,134	67,597
Industrial DMT Transportation (CTS)	1,088,210	1,248,603	1,148,385	1,088,210	1,248,603	1,148,385
Public Authority DMT Transportation (CTS)	21,617	21,007	18,961	21,617	19,977	25,000
Total DMT Service	**1,176,833**	**1,340,496**	**1,229,616**	**1,176,833**	**1,337,714**	**1,240,982**
Residential Transportation Service	264,049	223,366	259,586	250,049	233,766	261,640
Commercial Transportation Service	496,452	486,320	466,923	484,047	486,834	512,783
Industrial Transportation Service	1,388,989	1,598,981	1,413,051	1,388,989	1,598,981	1,413,051
Public Authority Transportation Service	228,331	224,148	195,964	226,559	215,656	241,827
Total Transportation Requirements	**2,377,821**	**2,532,815**	**2,335,523**	**2,349,644**	**2,535,237**	**2,429,301**
Total Requirements	**5,234,108**	**5,052,754**	**5,088,990**	**5,049,513**	**5,185,615**	**5,170,655**

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-06:

If past weather normalized sales or sales trends are used in models or otherwise relied on in reaching sales projections, please provide actual and normalized throughput by month by rate schedule from the beginning of the historic test year and the future test year through the most recent month available and update as additional data become available. Separately identify sales and transportation throughput and provide the workpapers which develop normalized sales.

Response:

Please see Attachment RR-06.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Actual MCF - Monthly
Based on Revenue Year

	Actuals (HTY)												Actuals since HTY	
Retail Sales	**Oct-24**	**Nov-24**	**Dec-24**	**Jan-25**	**Feb-25**	**Mar-25**	**Apr-25**	**May-25**	**Jun-25**	**Jul-25**	**Aug-25**	**Sep-25**	**Oct-25**	**Nov-25**
Residential	465,687	983,020	2,324,604	3,216,315	3,300,387	2,613,795	1,759,473	940,519	536,071	263,129	266,781	353,689	462,695	1,346,409
Commercial	84,484	166,947	375,063	561,364	618,183	497,660	322,105	169,600	103,877	64,816	62,590	81,474	90,254	242,382
Industrial	8,340	14,492	28,586	50,369	53,236	44,103	28,185	15,992	8,883	5,711	6,799	7,393	8,105	16,778
Public Authority	4,116	10,408	25,214	42,288	41,850	33,457	22,390	10,861	5,914	3,472	2,473	3,100	5,050	14,740
Total Retail Sales	**562,627**	**1,174,867**	**2,753,467**	**3,870,336**	**4,013,656**	**3,189,016**	**2,132,153**	**1,136,973**	**654,745**	**337,128**	**338,644**	**445,655**	**566,104**	**1,620,308**
Transportation Service														
Residential MMT Transportation	6,046	13,600	26,790	43,140	49,202	39,732	28,952	17,490	10,279	4,820	4,229	5,075	5,942	17,220
Commercial MMT Transportation	112,160	205,560	363,439	553,497	618,388	507,701	364,756	235,499	147,848	93,719	84,362	103,853	112,271	234,012
Industrial MMT Transportation	177,978	222,507	263,477	347,159	428,362	369,518	307,364	246,487	199,375	182,324	173,910	194,653	182,059	248,264
Public Authority MMT Transportation	46,280	108,717	175,166	280,801	348,171	292,347	211,453	146,020	86,908	45,147	38,109	56,103	48,154	120,450
Total MMT Service	**342,464**	**550,383**	**828,873**	**1,224,597**	**1,444,122**	**1,209,298**	**912,525**	**645,495**	**444,409**	**326,010**	**300,610**	**359,684**	**348,426**	**619,946**
Residential SATC Transportation	45,481	96,463	232,795	325,768	340,026	272,202	183,395	98,046	56,238	27,193	27,541	36,548	48,467	137,987
Commercial SATC Transportation	9,714	19,153	41,214	60,000	61,561	51,281	31,243	17,343	9,660	6,756	6,040	7,806	8,457	23,075
Industrial SATC Transportation	59	338	1,189	2,394	2,297	1,833	1,423	668	162	37	33	41	124	784
Public Authority SATC Transportation	267	729	1,837	3,008	2,999	2,292	1,421	532	421	249	129	157	270	877
Total SATC Service	**55,521**	**116,683**	**277,035**	**391,170**	**406,883**	**327,608**	**217,482**	**116,588**	**66,481**	**34,236**	**33,742**	**44,552**	**57,318**	**162,723**
Residential DMT Transportation (CTS)														
Commercial DMT Transportation (CTS)	47,940	55,211	62,269	75,890	87,971	59,050	70,146	61,514	53,617	45,860	47,215	44,482	44,026	52,339
Industrial DMT Transportation (CTS)	967,763	1,052,429	1,148,385	1,340,755	1,590,312	1,440,009	1,403,919	1,093,985	970,474	861,230	941,982	913,189	915,767	1,118,017
Public Authority DMT Transportation (CTS)	7,039	12,489	18,961	27,053	27,149	26,403	22,450	15,466	662	5,440	6,395	6,415	8,895	15,110
Total DMT Service	**1,022,742**	**1,120,129**	**1,229,616**	**1,443,699**	**1,705,432**	**1,525,462**	**1,496,515**	**1,170,965**	**1,024,753**	**912,530**	**995,592**	**964,086**	**968,688**	**1,185,466**
Residential Transportation Service	51,528	110,063	259,586	368,909	389,228	311,933	212,347	115,536	66,517	32,013	31,769	41,623	54,409	155,207
Commercial Transportation Service	169,814	279,923	466,923	689,387	767,920	618,032	466,146	314,355	211,125	146,335	137,617	156,141	164,755	309,426
Industrial Transportation Service	1,145,801	1,275,274	1,413,051	1,690,308	2,020,970	1,811,361	1,712,706	1,341,140	1,170,011	1,043,591	1,115,925	1,107,883	1,097,950	1,367,065
Public Authority Transportation Service	53,585	121,934	195,964	310,863	378,320	321,042	235,324	162,017	87,991	50,836	44,633	62,675	57,319	136,437
Total Transportation Requirements	**1,420,727**	**1,787,195**	**2,335,523**	**3,059,466**	**3,556,438**	**3,062,368**	**2,626,523**	**1,933,048**	**1,535,644**	**1,272,776**	**1,329,944**	**1,368,322**	**1,374,432**	**1,968,134**
Total Requirements	**1,983,354**	**2,962,062**	**5,088,990**	**6,929,802**	**7,570,093**	**6,251,384**	**4,758,676**	**3,070,020**	**2,190,388**	**1,609,904**	**1,668,588**	**1,813,977**	**1,940,536**	**3,588,443**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Normalized MCF - Monthly
Based on Revenue Year

	Normalized (HTY)												Normalized since HTY	
Retail Sales	**Oct-24**	**Nov-24**	**Dec-24**	**Jan-25**	**Feb-25**	**Mar-25**	**Apr-25**	**May-25**	**Jun-25**	**Jul-25**	**Aug-25**	**Sep-25**	**Oct-25**	**Nov-25**
Residential	509,804	1,207,296	2,309,933	2,982,635	3,007,660	2,617,441	1,854,431	1,019,206	434,733	265,503	264,696	298,251	487,131	1,150,864
Commercial	90,921	197,991	376,720	521,800	563,577	494,792	342,050	181,537	89,377	67,730	63,314	69,636	94,118	210,129
Industrial	8,340	14,492	28,586	50,369	53,236	44,103	28,185	15,992	8,883	5,711	6,799	7,393	8,105	16,778
Public Authority	4,559	12,702	26,115	38,959	37,756	32,953	24,548	11,420	4,702	6,480	2,208	2,571	5,310	12,643
Total Retail Sales	**613,624**	**1,432,481**	**2,741,354**	**3,593,763**	**3,662,229**	**3,189,289**	**2,249,214**	**1,228,155**	**537,695**	**345,424**	**337,017**	**377,851**	**594,664**	**1,390,414**
Transportation Service														
Residential MMT Transportation	6,747	15,421	30,032	40,434	44,212	37,532	32,513	18,692	8,369	6,409	4,409	4,585	6,200	15,116
Commercial MMT Transportation	122,536	228,072	403,852	519,680	559,768	483,795	404,721	247,431	128,305	90,407	89,361	92,671	113,635	209,800
Industrial MMT Transportation	177,978	222,507	263,477	347,159	428,362	369,518	307,364	246,487	199,375	182,324	173,910	194,653	182,059	248,264
Public Authority MMT Transportation	48,210	115,362	214,977	264,939	311,335	268,007	243,584	153,066	73,146	41,503	41,633	42,662	48,419	109,070
Total MMT Service	**355,471**	**581,362**	**912,338**	**1,172,212**	**1,343,677**	**1,158,852**	**988,182**	**665,676**	**409,195**	**320,643**	**309,313**	**334,571**	**350,313**	**582,250**
Residential SATC Transportation	49,789	118,399	231,608	302,172	309,787	272,370	193,096	106,252	45,412	27,417	27,320	30,810	51,302	117,833
Commercial SATC Transportation	10,825	22,868	41,334	55,845	56,247	51,050	33,009	18,626	8,477	6,918	6,296	6,719	8,748	20,030
Industrial SATC Transportation	59	338	1,189	2,394	2,297	1,833	1,423	668	162	37	33	41	124	784
Public Authority SATC Transportation	323	884	1,850	2,794	2,713	2,274	1,484	602	279	345	89	109	302	734
Total SATC Service	**60,996**	**142,489**	**275,981**	**363,205**	**371,044**	**327,527**	**229,012**	**126,148**	**54,330**	**34,717**	**33,738**	**37,679**	**60,476**	**139,381**
Residential DMT Transportation (CTS)														
Commercial DMT Transportation (CTS)	48,233	55,616	67,597	74,136	83,067	56,923	75,472	62,647	50,820	54,751	44,214	44,214	44,254	51,238
Industrial DMT Transportation (CTS)	967,763	1,052,429	1,148,385	1,340,755	1,590,312	1,440,009	1,403,919	1,093,985	970,474	861,230	941,982	913,189	915,767	1,118,017
Public Authority DMT Transportation (CTS)	11,496	13,038	25,000	25,531	24,175	23,768	26,434	16,280	3,051	3,051	3,051	3,228	8,666	13,468
Total DMT Service	**1,027,492**	**1,121,083**	**1,240,982**	**1,440,422**	**1,697,554**	**1,520,700**	**1,505,825**	**1,172,912**	**1,024,345**	**919,032**	**989,247**	**960,631**	**968,687**	**1,182,723**
Residential Transportation Service	56,536	133,820	261,640	342,606	353,999	309,902	225,609	124,944	53,781	33,826	31,729	35,395	57,502	132,949
Commercial Transportation Service	181,594	306,556	512,783	649,661	699,082	591,768	513,202	328,704	187,602	152,076	139,871	143,604	166,637	281,068
Industrial Transportation Service	1,145,800	1,275,274	1,413,051	1,690,308	2,020,971	1,811,360	1,712,706	1,341,140	1,170,011	1,043,591	1,115,925	1,107,883	1,097,950	1,367,065
Public Authority Transportation Service	60,029	129,284	241,827	293,264	338,223	294,049	271,502	169,948	76,476	44,899	44,773	45,999	57,387	123,272
Total Transportation Requirements	**1,443,959**	**1,844,934**	**2,429,301**	**2,975,839**	**3,412,275**	**3,007,079**	**2,723,019**	**1,964,736**	**1,487,870**	**1,274,392**	**1,332,298**	**1,332,881**	**1,379,476**	**1,904,354**
Total Requirements	**2,057,583**	**3,277,415**	**5,170,655**	**6,569,602**	**7,074,504**	**6,196,368**	**4,972,233**	**3,192,891**	**2,025,565**	**1,619,816**	**1,669,315**	**1,710,732**	**1,974,140**	**3,294,768**

Sample Load Norm Summary (non-Industrial)

Summary (all bill controls)

Rev Mth	(A) Actual Mcf	(B) Accounts	(A)/(B) (C) Actual Mcf/Account	Avg of lowest consective Avg from (C) (D) Base Mcf/Account	zeros for base mths (C)-(D) (E) Actual Heat/Account	from Deg Day Table (F) Actual Deg Day	All zeros for Indust (E)/(F) (G) Heat/Acct Deg Day	from Deg Day Table (H) Normal Deg Day	zeros for base mths (J)-(D) (I) Normal Heat/Account	For Summary (K)/(B) (J) Normal Mcf/Account	**Sum of all Bill Ctrls (K) Normalized Mcf**
Oct 2024	465,686.5	177,917	2.617	1.501	1.116	101	0.011050	124	1.364	2.865	509,804
Nov 2024	983,019.5	178,287	5.514	1.501	4.013	309	0.012987	404	5.271	6.772	1,207,296
Dec 2024	2,324,603.8	178,815	13.000	1.501	11.499	809	0.014214	809	11.417	12.918	2,309,933
Jan 2025	3,216,314.8	179,183	17.950	1.501	16.449	1,144	0.014378	1,052	15.145	16.646	2,982,635
Feb 2025	3,300,387.2	179,155	18.422	1.501	16.921	1,153	0.014676	1,040	15.287	16.788	3,007,660
Mar 2025	2,613,795.4	179,115	14.593	1.501	13.092	893	0.014661	894	13.112	14.613	2,617,441
Apr 2025	1,759,473.0	178,784	9.841	1.501	8.340	608	0.013717	647	8.871	10.372	1,854,431
May 2025	940,519.2	177,999	5.284	1.501	3.783	345	0.010965	382	4.225	5.726	1,019,206
Jun 2025	536,071.2	177,358	3.023	1.501	1.522	168	0.009060	106	0.950	2.451	434,733
Jul 2025	263,129.3	176,772	1.489	1.501	0.000	2	0.000000	11	0.000	1.502	265,503
Aug 2025	266,781.3	176,382	1.513	1.501	0.000	5	0.000000	0	0.000	1.501	264,696
Sep 2025	353,688.9	176,212	2.007	1.501	0.506	48	0.010542	18	0.192	1.693	298,251
	17,023,470.1	2,135,979	95.253	18.012	77.241	5,585	0.013830	5,487	75.834	93.847	16,771,589
		177,998	(Average)				(E)/(F)				

For column C, select two lowest consecutive values (base months), can be row 10 & row 21
For column E, the two lowest consecutive months highlighted in C are equal zero, all else is a formula

Note:
Normal Degree Days Based on NOAA 2015-2024 (5,485 Degree Days).
"Base Mcf/Acct" calculated over a 2 month time period.
Control Degree Days used in Normalization calculation.
Summary Degree Days based on the Average of 21 Controls.
"Normal Mcf/Acct" = "Normalized MCF" divided by "Accounts".
Number of Accounts has been adjusted for Initial/Final Bills.
Number of Accounts has been adjusted for Converting Customers.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-07:

Please provide the workpaper developing the Company's FTY load growth adjustment.

Response:

Please see attachment RR-07 and Exhibit CEH-3.

National Fuel Gas Distribution Corporation | **Gas Requirements**
Pennsylvania Division | **2026RC**
Projected Number of Accounts
Rev Mth Accts | **FTY Forecast - Accounts**

Total Requirements	October 2025	November 2025	December 2025	January 2026	February 2026	March 2026	April 2026	May 2026	June 2026	July 2026	August 2026	September 2026	Average
Residential Retail Sales	179,181	179,464	180,773	181,487	181,829	181,985	181,762	181,189	180,358	179,642	178,924	178,608	180,433
Residential MMT Transportation	523	525	530	531	533	532	534	534	537	575	575	573	542
Residential SATC Transportation	16,373	16,254	16,215	16,263	16,259	16,328	16,377	16,573	16,740	16,837	17,023	17,108	16,529
Residential DMT Transportation	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Residential Number of Accounts	196,077	196,243	197,518	198,281	198,620	198,845	198,673	198,296	197,635	197,054	196,521	196,289	197,504
Commercial Retail Sales	10,994	11,108	11,277	11,383	11,426	11,411	11,397	11,355	11,252	11,156	11,097	11,084	11,245
Commercial MMT Transportation	2,870	2,877	2,890	2,904	2,906	2,899	2,917	2,925	2,926	2,927	2,947	2,952	2,912
Commercial SATC Transportation	1,015	1,019	1,009	991	978	953	952	948	942	942	938	936	969
Commercial DMT Transportation	11	11	11	11	11	11	11	11	11	11	11	11	11
Total Commercial Number of Accounts	14,890	15,015	15,187	15,289	15,321	15,274	15,277	15,239	15,131	15,036	14,993	14,983	15,136
Industrial Retail Sales	183	182	182	182	183	183	184	183	178	184	180	180	182
Industrial MMT Transportation	337	337	345	345	344	345	341	342	345	336	338	338	341
Industrial SATC Transportation	14	14	14	14	14	14	14	14	14	14	14	14	14
Industrial DMT Transportation	62	62	62	62	62	62	62	62	62	62	62	62	62
Total Industrial Number of Accounts	596	595	603	603	603	604	601	601	599	596	594	594	599
Public Authority Retail Sales	542	542	565	558	532	532	533	534	525	537	520	509	536
Public Authority MMT Transportation	612	613	599	604	631	631	629	630	638	625	642	650	625
Public Authority SATC Transportation	44	44	44	44	44	44	44	44	44	44	44	44	44
Public Authority DMT Transportation	3	3	3	3	3	3	3	3	3	3	3	3	3
Total Public Authority Number of Accounts	1,201	1,202	1,211	1,209	1,210	1,210	1,209	1,211	1,210	1,209	1,209	1,206	1,208
Subtotal Number of Accounts	212,764	213,055	214,519	215,382	215,754	215,933	215,760	215,347	214,575	213,895	213,317	213,072	214,448
Company Use	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Number of Accounts	212,764	213,055	214,519	215,382	215,754	215,933	215,760	215,347	214,575	213,895	213,317	213,072	214,448

National Fuel Gas Distribution Corporation
Pennsylvania Division
Projected Volumes in Mcf
Rev Mth

Gas Requirements
2026RC

FTY Forecast - Volumes (in MCF)

0.15% Shrinkage

Based on NOAA 2015 - 2024 Degree Days (5485 DD)

Total Requirements	October 2025	November 2025	December 2025	January 2026	February 2026	March 2026	April 2026	May 2026	June 2026	July 2026	August 2026	September 2026	Total
Residential Retail Sales	551,913	1,279,185	2,348,483	2,991,851	2,976,857	2,589,587	1,961,046	1,223,479	506,109	254,987	225,697	269,132	17,178,326
Residential MMT Transportation	7,185	17,526	32,497	44,751	49,119	42,764	35,280	23,375	11,881	5,832	4,830	5,289	280,330
Residential SATC Transportation	52,463	118,276	216,001	274,669	271,954	236,937	180,873	114,606	47,372	24,478	21,798	25,688	1,585,116
Residential DMT Transportation	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Residential Throughput	611,561	1,414,987	2,596,981	3,311,271	3,297,930	2,869,289	2,177,199	1,361,461	565,362	285,297	252,326	300,109	19,043,773
Residential Shrinkage	919	2,126	3,901	4,974	4,954	4,310	3,271	2,045	849	429	379	451	28,608
Total Residential Requirements	612,480	1,417,113	2,600,882	3,316,245	3,302,884	2,873,599	2,180,470	1,363,506	566,211	285,726	252,705	300,560	19,072,381
Commercial Retail Sales	95,608	217,613	396,872	514,308	516,913	448,479	342,032	211,075	91,263	51,522	44,924	54,248	2,984,857
Commercial MMT Transportation	118,571	233,122	403,135	531,893	566,846	495,084	406,139	264,133	145,208	91,603	83,040	91,349	3,430,122
Commercial SATC Transportation	9,418	22,097	38,037	48,102	46,664	40,266	30,290	18,835	8,294	4,422	3,896	5,019	275,340
Commercial DMT Transportation	50,901	65,881	67,309	73,313	81,879	73,457	66,268	54,419	47,325	43,823	43,997	48,110	716,683
Total Commercial Throughput	274,498	538,713	905,353	1,167,616	1,212,302	1,057,285	844,730	548,462	292,090	191,370	175,857	198,726	7,407,002
Commercial Shrinkage	412	809	1,360	1,754	1,821	1,588	1,269	824	439	287	264	299	11,126
Total Commercial Requirements	274,910	539,522	906,713	1,169,370	1,214,123	1,058,873	845,999	549,286	292,529	191,657	176,121	199,025	7,418,128
Industrial Retail Sales	7,232	13,563	28,540	38,685	42,742	35,492	26,565	16,065	7,611	6,088	3,668	4,199	230,450
Industrial MMT Transportation	213,779	262,221	310,955	349,128	393,590	360,698	338,170	254,616	232,444	213,504	209,931	217,551	3,356,588
Industrial SATC Transportation	229	568	1,447	1,939	2,125	1,678	1,292	635	267	125	114	140	10,558
Industrial DMT Transportation	1,032,267	1,108,773	1,235,077	1,384,780	1,514,170	1,417,705	1,387,264	1,165,507	1,054,678	1,017,029	973,405	1,030,617	14,321,271
Total Industrial Throughput	1,253,506	1,385,124	1,576,019	1,774,532	1,952,626	1,815,572	1,753,291	1,436,824	1,295,001	1,236,747	1,187,117	1,252,507	17,918,867
Industrial Shrinkage	1,883	2,081	2,368	2,666	2,933	2,727	2,634	2,158	1,945	1,858	1,783	1,882	26,918
Total Industrial Requirements	1,255,389	1,387,205	1,578,387	1,777,198	1,955,559	1,818,299	1,755,925	1,438,982	1,296,946	1,238,605	1,188,900	1,254,389	17,945,785
Public Authority Retail Sales	4,892	12,243	25,684	33,587	31,898	27,478	20,927	11,842	3,836	1,565	936	1,491	176,378
Public Authority MMT Transportation	50,087	114,823	203,779	274,276	311,469	276,241	242,541	158,460	83,636	41,151	35,012	36,330	1,827,805
Public Authority SATC Transportation	460	1,003	2,118	3,040	3,111	2,675	1,938	884	433	376	103	155	16,296
Public Authority DMT Transportation	10,699	20,147	22,056	26,360	25,242	27,343	19,326	14,449	3,770	7,255	15,421	11,095	203,162
Total Public Authority Throughput	66,138	148,216	253,637	337,263	371,719	333,737	284,731	185,635	91,674	50,347	51,472	49,071	2,223,641
Public Authority Shrinkage	99	223	381	507	558	501	428	279	138	76	77	74	3,341
Total Public Authority Requirements	66,237	148,439	254,018	337,770	372,277	334,238	285,159	185,914	91,812	50,423	51,549	49,145	2,226,982
Subtotal Throughput	2,205,703	3,487,040	5,331,990	6,590,683	6,834,578	6,075,883	5,059,951	3,532,382	2,244,127	1,763,761	1,666,773	1,800,412	46,593,282
Subtotal Shrinkage	3,313	5,239	8,010	9,901	10,266	9,126	7,602	5,306	3,371	2,650	2,503	2,706	69,993
Subtotal Requirements	2,209,016	3,492,279	5,340,000	6,600,584	6,844,844	6,085,009	5,067,553	3,537,688	2,247,498	1,766,411	1,669,276	1,803,118	46,663,275
Company Use	237	745	1,583	2,147	2,202	1,712	1,308	595	163	73	53	85	10,903
Company Use Shrinkage	0	1	2	3	3	3	2	1	0	0	0	0	15
Company Use Requirements	237	746	1,585	2,150	2,205	1,715	1,310	596	163	73	53	85	10,918
Total Throughput	2,205,940	3,487,785	5,333,573	6,592,830	6,836,779	6,077,595	5,061,259	3,532,977	2,244,290	1,763,833	1,666,825	1,800,498	46,604,186
Total Shrinkage	3,313	5,240	8,012	9,904	10,269	9,129	7,604	5,307	3,371	2,650	2,503	2,706	70,008
Total Requirements	2,209,253	3,493,025	5,341,585	6,602,734	6,847,048	6,086,724	5,068,863	3,538,284	2,247,661	1,766,483	1,669,328	1,803,204	46,674,194

National Fuel Gas Distribution Corporation | **Gas Requirements**
Pennsylvania Division | **2026RC**
Projected Number of Accounts
Rev Mth Accts | **FPFTY Forecast - Accounts**

Total Requirements	November 2026	December 2026	January 2027	February 2027	March 2027	April 2027	May 2027	June 2027	July 2027	August 2027	September 2027	October 2027	Average
Residential Retail Sales	179,764	181,075	181,788	182,129	182,286	182,063	181,489	180,659	179,943	179,223	178,907	179,781	180,759
Residential MMT Transportation	529	532	533	534	534	536	536	539	577	576	575	528	544
Residential SATC Transportation	16,281	16,242	16,290	16,286	16,355	16,404	16,600	16,768	16,865	17,051	17,137	16,428	16,559
Residential DMT Transportation	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Residential Number of Accounts	196,574	197,848	198,611	198,949	199,175	199,003	198,625	197,965	197,384	196,851	196,619	196,737	197,862
Commercial Retail Sales	11,209	11,377	11,482	11,524	11,511	11,498	11,455	11,353	11,255	11,198	11,184	11,194	11,353
Commercial MMT Transportation	2,960	2,973	2,987	2,990	2,983	3,000	3,008	3,010	3,011	3,029	3,037	3,037	3,002
Commercial SATC Transportation	927	917	900	886	861	860	856	850	851	846	845	832	869
Commercial DMT Transportation	11	11	11	11	11	11	11	11	11	11	11	11	11
Total Commercial Number of Accounts	15,107	15,278	15,380	15,411	15,366	15,369	15,330	15,224	15,128	15,084	15,077	15,074	15,236
Industrial Retail Sales	182	182	182	185	185	184	183	179	184	181	180	183	183
Industrial MMT Transportation	338	347	347	346	347	343	343	347	338	339	339	341	343
Industrial SATC Transportation	14	14	14	14	14	14	14	14	14	14	14	14	14
Industrial DMT Transportation	62	62	62	62	62	62	62	62	62	62	62	62	62
Total Industrial Number of Accounts	596	605	605	607	608	603	602	602	598	596	595	600	601
Public Authority Retail Sales	509	531	525	499	498	500	500	492	503	487	476	476	500
Public Authority MMT Transportation	651	636	642	668	669	667	667	675	662	679	687	687	666
Public Authority SATC Transportation	44	44	44	44	44	44	44	44	44	44	44	44	44
Public Authority DMT Transportation	3	3	3	3	3	3	3	3	3	3	3	3	3
Total Public Authority Number of Accounts	1,207	1,214	1,214	1,214	1,214	1,214	1,214	1,214	1,212	1,213	1,210	1,210	1,213
Subtotal Number of Accounts	213,484	214,945	215,810	216,181	216,363	216,189	215,771	215,005	214,322	213,744	213,501	213,621	214,911
Company Use	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Number of Accounts	213,484	214,945	215,810	216,181	216,363	216,189	215,771	215,005	214,322	213,744	213,501	213,621	214,911

National Fuel Gas Distribution Corporation
Pennsylvania Division
Projected Volumes in Mcf
Rev Mth

Gas Requirements
2026RC

FPFTY Forecast - Volumes (in MCF)

0.15% Shrinkage

Based on NOAA 2015 - 2024 Degree Days (5485 DD)

Total Requirements	November 2026	December 2026	January 2027	February 2027	March 2027	April 2027	May 2027	June 2027	July 2027	August 2027	September 2027	October 2027	Total
Residential Retail Sales	1,283,898	2,355,917	3,000,230	2,985,135	2,597,119	1,967,444	1,228,626	510,008	258,383	229,031	272,568	561,049	17,249,408
Residential MMT Transportation	17,967	32,647	44,928	49,297	42,927	35,419	23,485	11,963	5,896	4,893	5,372	7,475	282,269
Residential SATC Transportation	118,711	216,685	275,438	272,711	237,626	181,463	115,089	47,737	24,804	22,120	26,016	53,332	1,591,734
Residential DMT Transportation	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Residential Throughput	1,420,577	2,605,249	3,320,596	3,307,143	2,877,672	2,184,327	1,367,200	569,708	289,084	256,044	303,956	621,856	19,123,411
Residential Shrinkage	2,134	3,914	4,988	4,968	4,323	3,281	2,054	856	434	385	457	934	28,728
Total Residential Requirements	1,422,711	2,609,163	3,325,584	3,312,111	2,881,995	2,187,608	1,369,254	570,564	289,518	256,429	304,413	622,790	19,152,139
Commercial Retail Sales	219,850	400,652	519,115	521,683	452,901	345,420	213,191	92,175	51,942	45,297	54,694	97,473	3,014,392
Commercial MMT Transportation	235,273	407,125	537,169	572,249	499,704	409,582	266,191	146,117	92,110	83,474	91,979	120,456	3,461,429
Commercial SATC Transportation	20,511	35,116	44,408	42,974	37,064	27,870	17,334	7,692	4,144	3,646	4,714	8,041	253,514
Commercial DMT Transportation	65,881	67,309	73,313	81,879	73,457	66,268	54,419	47,325	43,823	43,997	48,110	50,901	716,683
Total Commercial Throughput	541,515	910,201	1,174,005	1,218,785	1,063,126	849,141	551,135	293,308	192,019	176,414	199,497	276,871	7,446,017
Commercial Shrinkage	813	1,367	1,764	1,831	1,597	1,276	828	441	288	265	300	416	11,186
Total Commercial Requirements	542,328	911,568	1,175,769	1,220,616	1,064,723	850,417	551,963	293,749	192,307	176,679	199,797	277,287	7,457,203
Industrial Retail Sales	13,241	27,931	37,897	42,516	35,248	25,942	15,658	7,510	5,916	3,556	4,082	6,837	226,334
Industrial MMT Transportation	264,905	312,289	350,193	394,794	361,723	339,226	254,934	233,489	214,058	210,316	217,742	219,217	3,372,888
Industrial SATC Transportation	568	1,447	1,939	2,125	1,678	1,292	635	267	125	114	140	229	10,558
Industrial DMT Transportation	1,111,346	1,240,852	1,450,257	1,591,630	1,486,505	1,455,520	1,221,563	1,092,805	1,055,781	1,011,643	1,073,610	1,068,261	14,859,771
Total Industrial Throughput	1,390,059	1,582,519	1,840,286	2,031,065	1,885,154	1,821,980	1,492,790	1,334,071	1,275,880	1,225,629	1,295,574	1,294,544	18,469,551
Industrial Shrinkage	2,088	2,377	2,765	3,051	2,832	2,737	2,243	2,004	1,917	1,841	1,946	1,945	27,746
Total Industrial Requirements	1,392,147	1,584,896	1,843,051	2,034,116	1,887,986	1,824,717	1,495,033	1,336,075	1,277,797	1,227,470	1,297,520	1,296,489	18,497,297
Public Authority Retail Sales	10,980	22,980	30,485	28,818	24,467	18,596	10,437	3,368	1,331	756	1,269	3,803	157,291
Public Authority MMT Transportation	115,255	204,748	275,659	312,608	277,290	243,077	158,671	83,588	41,065	34,925	36,282	50,325	1,833,494
Public Authority SATC Transportation	1,003	2,118	3,040	3,111	2,675	1,938	884	433	376	103	155	460	16,296
Public Authority DMT Transportation	20,147	22,056	26,360	25,242	27,343	19,326	14,449	3,770	7,255	15,421	11,095	10,699	203,162
Total Public Authority Throughput	147,385	251,902	335,545	369,778	331,775	282,937	184,441	91,159	50,027	51,205	48,801	65,287	2,210,242
Public Authority Shrinkage	221	378	504	556	498	425	277	137	75	77	73	98	3,319
Total Public Authority Requirements	147,606	252,280	336,049	370,334	332,273	283,362	184,718	91,296	50,102	51,282	48,874	65,385	2,213,561
Subtotal Throughput	3,499,536	5,349,872	6,670,432	6,926,771	6,157,727	5,138,384	3,595,566	2,288,246	1,807,009	1,709,292	1,847,829	2,258,558	47,249,221
Subtotal Shrinkage	5,256	8,036	10,021	10,406	9,250	7,719	5,402	3,438	2,714	2,568	2,776	3,393	70,979
Subtotal Requirements	3,504,792	5,357,908	6,680,453	6,937,177	6,166,977	5,146,103	3,600,968	2,291,684	1,809,723	1,711,860	1,850,605	2,261,951	47,320,200
Company Use	745	1,583	2,147	2,202	1,712	1,308	595	163	73	53	85	237	10,903
Company Use Shrinkage	1	2	3	3	3	2	1	0	0	0	0	0	15
Company Use Requirements	746	1,585	2,150	2,205	1,715	1,310	596	163	73	53	85	237	10,918
Total Throughput	3,500,281	5,351,455	6,672,579	6,928,973	6,159,439	5,139,692	3,596,161	2,288,409	1,807,082	1,709,345	1,847,914	2,258,795	47,260,124
Total Shrinkage	5,257	8,038	10,024	10,409	9,253	7,721	5,403	3,438	2,714	2,568	2,776	3,393	70,994
Total Requirements	3,505,538	5,359,493	6,682,603	6,939,382	6,168,692	5,147,413	3,601,564	2,291,847	1,809,796	1,711,913	1,850,690	2,262,188	47,331,118

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-08:

Please provide a complete copy of the computer output generated by the Company's statistical analysis package for all residential, commercial, public authority and industrial econometric models of gas demand estimated by the Company, but not presented in the filing.

Response:

The Company did not analyze any econometric variables that were not utilized in the gas demand estimate.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-09:

Identify the historical data source(s) for each dependent and independent variable utilized to develop the econometric models of gas demands for each forecasted customer group.

Response:

The variables noted below were utilized for the development of the forecasted normalized consumption and customer growth trends.

(1) Monthly Consumption – The monthly consumption is a dependent variable in the gas forecast model. These consumptions are expressed in use (Mcf) per customer which are developed from the reported monthly sales and customer accounts.

(2) Monthly Accounts – The number of accounts is an independent variable. The reported end of month customer accounts are used in conjunction with the monthly consumption to develop a customer usage per account.

(3) Monthly Heating Degree Days – The actual monthly Heating Degree Days ("HDD") is an independent variable. The HDD are calculated based on a 65-degree Fahrenheit temperature base using the daily average temperature of a Gas Day and then summed by month to arrive at the Monthly Heating Degree Days. Each Gas Day is based upon the North American Standards board definition of a Gas Day which encompasses the 24-hour period from 10:00 a.m. to 10:00 a.m. The recording location for temperature weather data used to calculate HDD for NFG is Erie, PA (Station: ERIE INTL AP, PA US USW 00014860).

(4) Heating Season – Heating Season is an independent variable. This variable identifies the major heating months (November through March) when heat-sensitive accounts are expected to have a substantially increased consumption compared to other months. This variable was statistically significant within the Public Authority Retail Group and was used for forecasting.

(5) Weighted Time Trend – Weighted Time Trend is an independent variable. This variable captures trends in customer usage which include both known and unknown factors such as structure conservation related to more efficient building envelop construction, regular cycle appliance change-outs to more efficient units, upgrades to more efficient units, installation of energy conservation measures such as set-back thermostats and manual consumer behavior changes such as lowering thermostat settings in response to higher energy prices. This variable is weighted based on industry knowledge in order to capture trend impacts during the forecasted periods. This variable was statistically significant within the within the Residential Retail, Residential Transportation, and Public Authority Retail groups, and used for forecasting.

(6) Large Volume Customer Consumption – Large Volume customer consumptions are an independent variable. These consumptions are used to create an annual consumption profile for the majority of the highest users consuming over 25,000 Mcf annually, within the Industrial Transportation, Commercial Transportation, Commercial Retail, and Public Authority Transportation, groups. These profiles are used to spread consumption on a monthly basis, based on annual consumption estimates provided by customers. This spread is not used in instances where Large Volume customers provide monthly projections. If contact with a large volume customer is unable to be established, monthly historical usage is analyzed to determine their projected annual throughput.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-10:

Identify the source(s) and supporting documentation for the FTY value of each independent variable which required forecasting in the Company's gas demand models.

Response:

The variables noted below were utilized for the development of the forecasted normalized consumption and customer growth trends.

(1) Monthly Customers – Monthly customer counts utilized are produced by a Market Planning forecast through the Fully Projected Future Test Year. Attachment SDR-RR-11 provides the supporting data.

(2) Monthly Heating Degree Days – Normal Monthly Heating Degree Days ("HDD") are utilized for forecasting. National Fuel Gas Company utilizes a 10-year Normal HDD, which is based on officially recorded daily temperatures (on a Gas day basis) over the period of January 1, 2015 to December 31, 2024. The actual system HDD is calculated using temperature as identified in SDR-RR-09. Please see the Direct Testimony of Cathryn E. Hilliard, National Fuel Statement No. 13, National Fuel Exhibit CEH-1 for HDD Values.

(3) Heating Season – Heating season is a binary value assigned to each month within the heating season.

(4) Weighted Time Trend – The Weighted Time Trend variable is a projection of the future gas prices based on the January 10, 2025 publication of the "Blue Chip Economic Indicators®." This variable is weighted based on industry knowledge in order to capture trend impacts during the forecasted periods.

(5) Large Volume Customer Survey – A survey of the highest users (>25,000

Mcf/year) within the Industrial, Commercial, and Public Authority groups is completed to best determine their projected usage during the FTY and beyond. These customers provide monthly or annual usage, depending on their capabilities. For customers that only provide annual usage, the customer profile detailed in RR-9-(6) is used to create a monthly consumption forecast. If contact with a large volume customer is unable to be established, monthly historical usage is analyzed to determine their projected annual throughput.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-11:

Please provide in hard copy and on a computer diskette in Lotus 1-2-3, QuattroPro or other spreadsheet format, the dependent and independent variable databases relied upon to produce the Company's gas demand models. For variables based on averages, include the observations which comprise the average (e.g., gas prices).

Response:

For Gas Price variables and Heating Degree Days relied upon to produce the Company gas demand model and for regression results, please see Attachment RR-11 which has been provided in electronic format.

Pennsylvania Division

Heating Degree Days
January 2010 - December 2024

	HDDs Heating Degree Days (Not Normalized)
Jan-10	1,250
Feb-10	1,169
Mar-10	954
Apr-10	542
May-10	345
Jun-10	80
Jul-10	21
Aug-10	1
Sep-10	34
Oct-10	217
Nov-10	464
Dec-10	925
Jan-11	1,268
Feb-11	1,213
Mar-11	978
Apr-11	767
May-11	405
Jun-11	101
Jul-11	12
Aug-11	0
Sep-11	25
Oct-11	160
Nov-11	444
Dec-11	711
Jan-12	1,013
Feb-12	922
Mar-12	695
Apr-12	525
May-12	357
Jun-12	88
Jul-12	9
Aug-12	1
Sep-12	28
Oct-12	227
Nov-12	491
Dec-12	768
Jan-13	1,022
Feb-13	1,068
Mar-13	1,016
Apr-13	797
May-13	293
Jun-13	153
Jul-13	17
Aug-13	8
Sep-13	45
Oct-13	153
Nov-13	483
Dec-13	977
Jan-14	1,263
Feb-14	1,316

Pennsylvania Division

Heating Degree Days
January 2010 - December 2024

	HDDs Heating Degree Days (Not Normalized)
Mar-14	1,216
Apr-14	785
May-14	389
Jun-14	112
Jul-14	12
Aug-14	8
Sep-14	45
Oct-14	184
Nov-14	482
Dec-14	923
Jan-15	1,174
Feb-15	1,359
Mar-15	1,280
Apr-15	719
May-15	358
Jun-15	110
Jul-15	14
Aug-15	4
Sep-15	16
Oct-15	143
Nov-15	356
Dec-15	677
Jan-16	968
Feb-16	995
Mar-16	820
Apr-16	665
May-16	456
Jun-16	95
Jul-16	6
Aug-16	0
Sep-16	6
Oct-16	98
Nov-16	364
Dec-16	807
Jan-17	1,045
Feb-17	886
Mar-17	806
Apr-17	606
May-17	355
Jun-17	118
Jul-17	13
Aug-17	1
Sep-17	53
Oct-17	89
Nov-17	415
Dec-17	878
Jan-18	1,355
Feb-18	1,038
Mar-18	883
Apr-18	875

Pennsylvania Division

Heating Degree Days
January 2010 - December 2024

	HDDs Heating Degree Days (Not Normalized)
May-18	376
Jun-18	60
Jul-18	4
Aug-18	0
Sep-18	10
Oct-18	122
Nov-18	547
Dec-18	923
Jan-19	1,010
Feb-19	1,109
Mar-19	1,039
Apr-19	673
May-19	383
Jun-19	122
Jul-19	8
Aug-19	0
Sep-19	7
Oct-19	91
Nov-19	479
Dec-19	877
Jan-20	924
Feb-20	940
Mar-20	823
Apr-20	633
May-20	486
Jun-20	123
Jul-20	11
Aug-20	0
Sep-20	19
Oct-20	162
Nov-20	365
Dec-20	745
Jan-21	1,015
Feb-21	1,095
Mar-21	877
Apr-21	490
May-21	370
Jun-21	109
Jul-21	9
Aug-21	0
Sep-21	3
Oct-21	60
Nov-21	374
Dec-21	757
Jan-22	1,012
Feb-22	1,153
Mar-22	853
Apr-22	635
May-22	367
Jun-22	84

Pennsylvania Division

Heating Degree Days
January 2010 - December 2024

	HDDs Heating Degree Days (Not Normalized)
Jul-22	10
Aug-22	0
Sep-22	13
Oct-22	245
Nov-22	427
Dec-22	857
Jan-23	1,016
Feb-23	917
Mar-23	860
Apr-23	625
May-23	405
Jun-23	145
Jul-23	18
Aug-23	0
Sep-23	22
Oct-23	134
Nov-23	404
Dec-23	751
Jan-24	949
Feb-24	924
Mar-24	700
Apr-24	628
May-24	232
Jun-24	67
Jul-24	8
Aug-24	1
Sep-24	18
Oct-24	101
Nov-24	309
Dec-24	809

Pennsylvania Division

Residential Gas Price

January 2010 - December 2024

	Real 12-Month Retail/Choice Avg Price
Jan-10	$13.4168
Feb-10	$12.3788
Mar-10	$11.6300
Apr-10	$11.1215
May-10	$10.8453
Jun-10	$10.7145
Jul-10	$10.6224
Aug-10	$10.5912
Sep-10	$10.6174
Oct-10	$10.6794
Nov-10	$10.7320
Dec-10	$10.7089
Jan-11	$10.7280
Feb-11	$10.7547
Mar-11	$10.7826
Apr-11	$10.7273
May-11	$10.7238
Jun-11	$10.7270
Jul-11	$10.7252
Aug-11	$10.7120
Sep-11	$10.6930
Oct-11	$10.6821
Nov-11	$10.6778
Dec-11	$10.7511
Jan-12	$10.8567
Feb-12	$10.8829
Mar-12	$10.8315
Apr-12	$10.8146
May-12	$10.7599
Jun-12	$10.7159
Jul-12	$10.6773
Aug-12	$10.6357
Sep-12	$10.5777
Oct-12	$10.4689
Nov-12	$10.3349
Dec-12	$10.2323
Jan-13	$10.1149
Feb-13	$9.9823
Mar-13	$9.8253
Apr-13	$9.7008
May-13	$9.6985
Jun-13	$9.6868
Jul-13	$9.6842
Aug-13	$9.6809
Sep-13	$9.6831
Oct-13	$9.7089
Nov-13	$9.7263
Dec-13	$9.6462
Jan-14	$9.5668
Feb-14	$9.5631

Pennsylvania Division

Residential Gas Price

January 2010 - December 2024

	Real 12-Month Retail/Choice Avg Price
Mar-14	$9.6254
Apr-14	$9.6905
May-14	$9.7029
Jun-14	$9.6624
Jul-14	$9.6596
Aug-14	$9.6470
Sep-14	$9.6256
Oct-14	$9.6032
Nov-14	$9.5652
Dec-14	$9.4913
Jan-15	$9.3964
Feb-15	$9.1673
Mar-15	$8.8454
Apr-15	$8.6524
May-15	$8.5149
Jun-15	$8.4900
Jul-15	$8.4401
Aug-15	$8.3968
Sep-15	$8.3573
Oct-15	$8.2892
Nov-15	$8.1867
Dec-15	$8.0421
Jan-16	$7.8150
Feb-16	$7.6009
Mar-16	$7.4932
Apr-16	$7.3494
May-16	$7.2428
Jun-16	$7.2168
Jul-16	$7.1964
Aug-16	$7.2006
Sep-16	$7.2172
Oct-16	$7.2426
Nov-16	$7.2902
Dec-16	$7.3730
Jan-17	$7.4974
Feb-17	$7.7562
Mar-17	$8.0431
Apr-17	$8.2800
May-17	$8.4572
Jun-17	$8.5021
Jul-17	$8.5264
Aug-17	$8.5270
Sep-17	$8.5086
Oct-17	$8.5033
Nov-17	$8.5049
Dec-17	$8.5597
Jan-18	$8.5775
Feb-18	$8.5673
Mar-18	$8.5220
Apr-18	$8.4248

Pennsylvania Division

Residential Gas Price

January 2010 - December 2024

	Real 12-Month Retail/Choice Avg Price
May-18	$8.3823
Jun-18	$8.3631
Jul-18	$8.3423
Aug-18	$8.3167
Sep-18	$8.2925
Oct-18	$8.2545
Nov-18	$8.1717
Dec-18	$8.0741
Jan-19	$8.0416
Feb-19	$7.9412
Mar-19	$7.8596
Apr-19	$7.8664
May-19	$7.8516
Jun-19	$7.8372
Jul-19	$7.8251
Aug-19	$7.8120
Sep-19	$7.7958
Oct-19	$7.7794
Nov-19	$7.7424
Dec-19	$7.6529
Jan-20	$7.5610
Feb-20	$7.4836
Mar-20	$7.4192
Apr-20	$7.3442
May-20	$7.2598
Jun-20	$7.2264
Jul-20	$7.2076
Aug-20	$7.1935
Sep-20	$7.1851
Oct-20	$7.1669
Nov-20	$7.1915
Dec-20	$7.2659
Jan-21	$7.2902
Feb-21	$7.2825
Mar-21	$7.2775
Apr-21	$7.3020
May-21	$7.3176
Jun-21	$7.3034
Jul-21	$7.2778
Aug-21	$7.2609
Sep-21	$7.2533
Oct-21	$7.2542
Nov-21	$7.2948
Dec-21	$7.4561
Jan-22	$7.6815
Feb-22	$7.9001
Mar-22	$8.0546
Apr-22	$8.0912
May-22	$8.1375
Jun-22	$8.1388

Pennsylvania Division

Residential Gas Price

January 2010 - December 2024

	Real 12-Month Retail/Choice Avg Price
Jul-22	$8.1172
Aug-22	$8.1066
Sep-22	$8.1024
Oct-22	$8.1542
Nov-22	$8.2720
Dec-22	$8.4940
Jan-23	$8.7724
Feb-23	$9.0414
Mar-23	$9.3345
Apr-23	$9.5175
May-23	$9.6033
Jun-23	$9.6200
Jul-23	$9.6481
Aug-23	$9.6369
Sep-23	$9.5923
Oct-23	$9.2769
Nov-23	$8.6433
Dec-23	$7.5477
Jan-24	$7.0270
Feb-24	$6.6957
Mar-24	$6.4541
Apr-24	$6.1825
May-24	$6.0630
Jun-24	$6.0117
Jul-24	$6.0055
Aug-24	$6.0153
Sep-24	$6.0375
Oct-24	$6.3434
Nov-24	$6.8822
Dec-24	$7.6412

Pennsylvania Division

Public Authority Customers

January 2010 - December 2024

	Real 12-Month Retail/Choice Avg Price
Jan-10	$11.8405
Feb-10	$10.7336
Mar-10	$9.9340
Apr-10	$9.3946
May-10	$9.1337
Jun-10	$9.0214
Jul-10	$8.9318
Aug-10	$8.8653
Sep-10	$8.8798
Oct-10	$8.8834
Nov-10	$8.9266
Dec-10	$8.8916
Jan-11	$8.9068
Feb-11	$8.9332
Mar-11	$8.9595
Apr-11	$8.9262
May-11	$8.9183
Jun-11	$8.9126
Jul-11	$8.8950
Aug-11	$8.8841
Sep-11	$9.0074
Oct-11	$9.0087
Nov-11	$9.0067
Dec-11	$9.0759
Jan-12	$9.1539
Feb-12	$9.1567
Mar-12	$9.0807
Apr-12	$9.0370
May-12	$8.9820
Jun-12	$8.9376
Jul-12	$8.9128
Aug-12	$8.8673
Sep-12	$8.6364
Oct-12	$8.5506
Nov-12	$8.4375
Dec-12	$8.3581
Jan-13	$8.2605
Feb-13	$8.1689
Mar-13	$8.0712
Apr-13	$7.9872
May-13	$7.9730
Jun-13	$7.9723
Jul-13	$7.9560
Aug-13	$7.9447
Sep-13	$7.9310
Oct-13	$7.9526
Nov-13	$7.9675
Dec-13	$7.9233
Jan-14	$7.8834
Feb-14	$7.9012

Pennsylvania Division

Public Authority Customers

January 2010 - December 2024

	Real 12-Month Retail/Choice Avg Price
Mar-14	$7.9792
Apr-14	$8.0478
May-14	$8.0774
Jun-14	$8.0879
Jul-14	$8.0895
Aug-14	$8.0975
Sep-14	$8.0764
Oct-14	$8.0571
Nov-14	$8.0158
Dec-14	$7.9981
Jan-15	$7.9040
Feb-15	$7.6623
Mar-15	$7.3485
Apr-15	$7.1477
May-15	$7.0249
Jun-15	$6.9683
Jul-15	$6.9198
Aug-15	$6.8681
Sep-15	$6.8310
Oct-15	$6.7683
Nov-15	$6.6529
Dec-15	$6.4907
Jan-16	$6.2337
Feb-16	$6.0053
Mar-16	$5.8524
Apr-16	$5.7182
May-16	$5.6242
Jun-16	$5.5959
Jul-16	$5.5752
Aug-16	$5.5693
Sep-16	$5.5716
Oct-16	$5.5873
Nov-16	$5.6508
Dec-16	$5.7538
Jan-17	$5.8986
Feb-17	$6.1546
Mar-17	$6.4330
Apr-17	$6.6464
May-17	$6.7929
Jun-17	$6.8220
Jul-17	$6.8412
Aug-17	$6.8156
Sep-17	$6.8179
Oct-17	$6.8125
Nov-17	$6.8307
Dec-17	$6.9027
Jan-18	$6.9839
Feb-18	$7.0156
Mar-18	$6.9885
Apr-18	$6.9427

Pennsylvania Division

Public Authority Customers

January 2010 - December 2024

	Real 12-Month Retail/Choice Avg Price
May-18	$6.9054
Jun-18	$6.8832
Jul-18	$6.8726
Aug-18	$6.8717
Sep-18	$6.8271
Oct-18	$6.7926
Nov-18	$6.7410
Dec-18	$6.6881
Jan-19	$6.6539
Feb-19	$6.5879
Mar-19	$6.5526
Apr-19	$6.5542
May-19	$6.5602
Jun-19	$6.5523
Jul-19	$6.5354
Aug-19	$6.5511
Sep-19	$6.5630
Oct-19	$6.5796
Nov-19	$6.5387
Dec-19	$6.4382
Jan-20	$6.3082
Feb-20	$6.1789
Mar-20	$6.0506
Apr-20	$5.9510
May-20	$5.9110
Jun-20	$5.8713
Jul-20	$5.8622
Aug-20	$5.8470
Sep-20	$5.8451
Oct-20	$5.8260
Nov-20	$5.8330
Dec-20	$5.8751
Jan-21	$5.8667
Feb-21	$5.8586
Mar-21	$5.8590
Apr-21	$5.8612
May-21	$5.7805
Jun-21	$5.7798
Jul-21	$5.7581
Aug-21	$5.7460
Sep-21	$5.7286
Oct-21	$5.7278
Nov-21	$5.7809
Dec-21	$5.9563
Jan-22	$6.2311
Feb-22	$6.5371
Mar-22	$6.7453
Apr-22	$6.8391
May-22	$7.1156
Jun-22	$7.1276

Pennsylvania Division

Public Authority Customers

January 2010 - December 2024

	Real 12-Month Retail/Choice Avg Price
Jul-22	$7.1207
Aug-22	$7.1068
Sep-22	$7.1268
Oct-22	$7.1731
Nov-22	$7.2757
Dec-22	$7.4921
Jan-23	$7.7586
Feb-23	$7.3679
Mar-23	$7.0393
Apr-23	$7.1459
May-23	$7.2098
Jun-23	$7.2152
Jul-23	$7.2218
Aug-23	$7.2282
Sep-23	$7.2067
Oct-23	$7.1393
Nov-23	$6.9574
Dec-23	$6.6218
Jan-24	$6.0189
Feb-24	$6.0357
Mar-24	$6.1583
Apr-24	$5.7742
May-24	$5.5711
Jun-24	$5.5135
Jul-24	$5.4895
Aug-24	$5.4749
Sep-24	$5.4688
Oct-24	$5.4792
Nov-24	$5.4979
Dec-24	$5.4346

Pennsylvania Division

Commercial Gas Price

January 2010 - December 2024

	Real 12-Month Retail/Choice Avg Price
Jan-10	$12.2050
Feb-10	$11.1138
Mar-10	$10.3318
Apr-10	$9.8109
May-10	$9.5463
Jun-10	$9.4399
Jul-10	$9.3440
Aug-10	$9.3105
Sep-10	$9.3365
Oct-10	$9.3855
Nov-10	$9.4285
Dec-10	$9.4168
Jan-11	$9.4331
Feb-11	$9.4640
Mar-11	$9.4978
Apr-11	$9.4625
May-11	$9.4695
Jun-11	$9.4588
Jul-11	$9.4552
Aug-11	$9.4400
Sep-11	$9.4213
Oct-11	$9.4090
Nov-11	$9.4082
Dec-11	$9.4683
Jan-12	$9.5723
Feb-12	$9.6090
Mar-12	$9.5627
Apr-12	$9.5452
May-12	$9.5042
Jun-12	$9.4699
Jul-12	$9.4355
Aug-12	$9.3915
Sep-12	$9.3331
Oct-12	$9.2408
Nov-12	$9.1300
Dec-12	$9.0488
Jan-13	$8.9473
Feb-13	$8.8258
Mar-13	$8.7018
Apr-13	$8.5981
May-13	$8.5869
Jun-13	$8.5714
Jul-13	$8.5669
Aug-13	$8.5610
Sep-13	$8.5602
Oct-13	$8.5738
Nov-13	$8.5758
Dec-13	$8.5061
Jan-14	$8.4314
Feb-14	$8.4310

Pennsylvania Division

Commercial Gas Price

January 2010 - December 2024

	Real 12-Month Retail/Choice Avg Price
Mar-14	$8.4923
Apr-14	$8.5432
May-14	$8.5473
Jun-14	$8.5666
Jul-14	$8.5567
Aug-14	$8.5465
Sep-14	$8.5242
Oct-14	$8.5020
Nov-14	$8.4701
Dec-14	$8.4005
Jan-15	$8.3027
Feb-15	$8.0638
Mar-15	$7.7541
Apr-15	$7.5563
May-15	$7.4331
Jun-15	$7.3675
Jul-15	$7.3239
Aug-15	$7.2787
Sep-15	$7.2367
Oct-15	$7.1770
Nov-15	$7.0784
Dec-15	$6.9372
Jan-16	$6.7122
Feb-16	$6.4892
Mar-16	$6.3474
Apr-16	$6.2175
May-16	$6.1447
Jun-16	$6.1271
Jul-16	$6.1111
Aug-16	$6.1155
Sep-16	$6.1365
Oct-16	$6.1633
Nov-16	$6.2127
Dec-16	$6.2999
Jan-17	$6.4270
Feb-17	$6.6863
Mar-17	$6.9712
Apr-17	$7.1954
May-17	$7.3317
Jun-17	$7.3621
Jul-17	$7.3869
Aug-17	$7.3885
Sep-17	$7.3690
Oct-17	$7.3636
Nov-17	$7.3686
Dec-17	$7.4157
Jan-18	$7.4707
Feb-18	$7.4673
Mar-18	$7.4259
Apr-18	$7.3561

Pennsylvania Division

Commercial Gas Price

January 2010 - December 2024

	Real 12-Month Retail/Choice Avg Price
May-18	$7.3161
Jun-18	$7.2909
Jul-18	$7.2687
Aug-18	$7.2466
Sep-18	$7.2257
Oct-18	$7.1966
Nov-18	$7.1330
Dec-18	$7.0619
Jan-19	$7.0197
Feb-19	$6.9453
Mar-19	$6.8866
Apr-19	$6.8798
May-19	$6.8644
Jun-19	$6.8545
Jul-19	$6.8451
Aug-19	$6.8329
Sep-19	$6.8193
Oct-19	$6.8008
Nov-19	$6.7635
Dec-19	$6.6719
Jan-20	$6.5632
Feb-20	$6.4656
Mar-20	$6.3749
Apr-20	$6.3016
May-20	$6.2357
Jun-20	$6.2162
Jul-20	$6.1984
Aug-20	$6.1844
Sep-20	$6.1762
Oct-20	$6.1624
Nov-20	$6.1795
Dec-20	$6.2472
Jan-21	$6.2984
Feb-21	$6.3151
Mar-21	$6.3203
Apr-21	$6.3338
May-21	$6.3520
Jun-21	$6.3332
Jul-21	$6.3112
Aug-21	$6.2977
Sep-21	$6.2963
Oct-21	$6.3003
Nov-21	$6.3561
Dec-21	$6.5389
Jan-22	$6.8062
Feb-22	$7.0918
Mar-22	$7.3091
Apr-22	$7.3858
May-22	$7.4230
Jun-22	$7.4243

Pennsylvania Division

Commercial Gas Price

January 2010 - December 2024

	Real 12-Month Retail/Choice Avg Price
Jul-22	$7.4126
Aug-22	$7.4124
Sep-22	$7.4213
Oct-22	$7.4718
Nov-22	$7.5779
Dec-22	$7.7619
Jan-23	$8.0073
Feb-23	$7.8822
Mar-23	$8.0028
Apr-23	$8.0217
May-23	$8.0892
Jun-23	$8.0953
Jul-23	$8.1150
Aug-23	$8.1022
Sep-23	$8.0595
Oct-23	$7.9645
Nov-23	$7.7944
Dec-23	$7.4693
Jan-24	$6.9768
Feb-24	$6.9146
Mar-24	$6.7427
Apr-24	$6.5655
May-24	$6.4493
Jun-24	$6.4094
Jul-24	$6.3895
Aug-24	$6.3803
Sep-24	$6.4003
Oct-24	$6.4609
Nov-24	$6.5224
Dec-24	$6.5336

Account Forecasting - Regression Results

Cumulative Regular Residential

SUMMARY OUTPUT

Residential - Res MMT
Residential - SATS SATC
Retail - Res - Res E
Retail - Res - LIRA

Regression Statistics	
Multiple R	0.639746777
R Square	0.409275939
Adjusted R Square	0.405717361
Standard Error	1750.501322
Observations	168

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	352423230.3	352423230.3	115.0110694	1.01507E-20
Residual	166	508666309.7	3064254.878		
Total	167	861089540.1			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	152425.8438	3944.245177	38.64512395	6.69688E-85	144638.4927	160213.1948	144638.4927	160213.1948
Month	0.981190573	0.091492089	10.72432139	1.01507E-20	0.800552455	1.16182869	0.800552455	1.16182869

Residential - SPCA LL MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.543014215
R Square	0.294864438
Adjusted R Square	0.290903002
Standard Error	2.549063155
Observations	180

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	483.6497564	483.6497564	74.43372992	3.40393E-15
Residual	178	1156.594688	6.497722966		
Total	179	1640.244444			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-37.6096344	5.157392243	-7.292374253	9.62744E-12	-47.78713369	-27.43213512	-47.78713369	-27.43213512
Month	0.001036429	0.000120131	8.627498474	3.40393E-15	0.000799365	0.001273492	0.000799365	0.001273492

Residential - SPCA UL MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.688758965
R Square	0.474388912
Adjusted R Square	0.471436041
Standard Error	5.652032721
Observations	180

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	5132.150093	5132.150093	160.6534344	1.1873E-26
Residual	178	5686.294351	31.94547388		
Total	179	10818.44444			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-124.2897219	11.43547568	-10.86878459	1.98381E-21	-146.856271	-101.7231727	-146.856271	-101.7231727
Month	0.003376164	0.000266366	12.67491359	1.1873E-26	0.002850523	0.003901805	0.002850523	0.003901805

Residential - LCPA MMT

SUMMARY OUTPUT

Account Forecasting - Regression Results

Regression Statistics	
Multiple R	0.585103297
R Square	0.342345868
Adjusted R Square	0.338651181
Standard Error	1.651041923
Observations	180

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	252.5827811	252.5827811	92.65898508	6.39957E-18
Residual	178	485.2172189	2.725939432		
Total	179	737.8			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-9.43338931	3.34047071	-2.823970071	0.005284178	-16.02541037	-2.841368252	-16.02541037	-2.841368252
Month	0.00074899	7.78094E-05	9.625953723	6.39957E-18	0.000595442	0.000902537	0.000595442	0.000902537

Residential - SPCA LL SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.714894019
R Square	0.511073458
Adjusted R Square	0.50832668
Standard Error	0.559364435
Observations	180

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	58.21694548	58.21694548	186.0628699	1.82929E-29
Residual	178	55.69416563	0.312888571		
Total	179	113.9111111			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-14.84914739	1.13173414	-13.12070288	5.97421E-28	-17.08248991	-12.61580487	-17.08248991	-12.61580487
Month	0.000359583	2.63614E-05	13.64048643	1.82929E-29	0.000307561	0.000411604	0.000307561	0.000411604

Retail - Res - LL

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.796206263
R Square	0.633944413
Adjusted R Square	0.631887921
Standard Error	8.442021143
Observations	180

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	21969.34011	21969.34011	308.2649453	1.07004E-40
Residual	178	12685.65434	71.26772099		
Total	179	34654.99444			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-282.6892897	17.08031999	-16.55058511	7.41354E-38	-316.3952667	-248.9833126	-316.3952667	-248.9833126
Month	0.006985257	0.000397851	17.55747548	1.07004E-40	0.006200145	0.007770368	0.006200145	0.007770368

Retail - Res - UL

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.814114745
R Square	0.662782818
Adjusted R Square	0.66088834
Standard Error	2.907235126

Account Forecasting - Regression Results

Observations	180

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	2956.935583	2956.935583	349.8497348	7.04982E-44
Residual	178	1504.458862	8.452016077		
Total	179	4461.394444			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-102.1505843	5.882063714	-17.36645321	3.67345E-40	-113.7581364	-90.54303215	-113.7581364	-90.54303215
Month	0.002562682	0.000137011	18.7042705	7.04982E-44	0.002292308	0.002833056	0.002292308	0.002833056

Retail - Res - LCPA

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.047108224
R Square	0.002219185
Adjusted R Square	-0.003386325
Standard Error	1.769600839
Observations	180

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	1.239735239	1.239735239	0.395893449	0.530024393
Residual	178	557.4047092	3.13148713		
Total	179	558.6444444			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	3.906781776	3.580345047	1.091174656	0.276670857	-3.158602715	10.97216627	-3.158602715	10.97216627
Month	-5.24733E-05	8.33968E-05	-0.629200643	0.530024393	-0.000217047	0.0001121	-0.000217047	0.0001121

Commercial - Res MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.933985344
R Square	0.872328623
Adjusted R Square	0.870970417
Standard Error	0.813910865
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	425.4691991	425.4691991	642.2652636	8.50389E-44
Residual	94	62.2703842	0.662450896		
Total	95	487.7395833			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-107.1573647	4.351980691	-24.62266547	8.99884E-43	-115.7983244	-98.516405	-115.7983244	-98.516405
Month	0.00249593	9.84861E-05	25.34295294	8.50389E-44	0.002300383	0.002691476	0.002300383	0.002691476

Commercial - SCPA LL MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.954878566
R Square	0.911793076
Adjusted R Square	0.910854704
Standard Error	33.90329864
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	1116877.069	1116877.069	971.6759739	2.35756E-51

Account Forecasting - Regression Results

Residual	94	108046.7639	1149.433658					
Total	95	1224923.833						

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-4803.59943	181.2809085	-26.49809883	2.14372E-45	-5163.536924	-4443.661937	-5163.536924	-4443.661937
Month	0.12787952	0.004102421	31.17171753	2.35756E-51	0.119734066	0.136024974	0.119734066	0.136024974

Commercial - SCPA UL MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.932563043
R Square	0.86967383
Adjusted R Square	0.868287381
Standard Error	31.48918824
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	621978.7558	621978.7558	627.2672612	2.24055E-43
Residual	94	93207.48374	991.5689759		
Total	95	715186.2396			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-3242.874185	168.3726623	-19.26009924	2.14279E-34	-3577.182053	-2908.566317	-3577.182053	-2908.566317
Month	0.095430255	0.003810305	25.04530417	2.24055E-43	0.087864805	0.102995706	0.087864805	0.102995706

Commercial - LCPA MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.223494931
R Square	0.049949984
Adjusted R Square	0.039843069
Standard Error	19.34248642
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	1849.018853	1849.018853	4.942159281	0.028605849
Residual	94	35168.3874	374.1317808		
Total	95	37017.40625			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	504.8385039	103.4242582	4.88123882	4.301E-06	299.4872148	710.1897929	299.4872148	710.1897929
Month	0.005203182	0.002340511	2.223096777	0.028605849	0.000556043	0.00985032	0.000556043	0.00985032

Commercial - Res SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.070569505
R Square	0.004980055
Adjusted R Square	-0.005605264
Standard Error	0.43447844
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	0.08881098	0.08881098	0.470468125	0.494460165
Residual	94	17.74452235	0.188771514		
Total	95	17.83333333			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-1.384844723	2.323155841	-0.596104962	0.552537862	-5.997525104	3.227835658	-5.997525104	3.227835658

Account Forecasting - Regression Results

Month	3.60605E-05	5.25735E-05	0.68590679	0.494460165	-6.83253E-05	0.000140446	-6.83253E-05	0.000140446

Commercial - SCPA LL SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.987666237
R Square	0.975484596
Adjusted R Square	0.975223794
Standard Error	37.6117966
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	5291238.899	5291238.899	3740.323903	1.6716E-77
Residual	94	132976.8409	1414.647243		
Total	95	5424215.74			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	13379.41178	201.1102439	66.52774874	7.31907E-81	12980.10267	13778.72088	12980.10267	13778.72088
Month	-0.278340879	0.004551163	-61.15818754	1.6716E-77	-0.28737732	-0.269304438	-0.28737732	-0.269304438

Commercial - SCPA UL SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.946175371
R Square	0.895247832
Adjusted R Square	0.894133447
Standard Error	23.573714
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	446441.0604	446441.0604	803.3561272	7.6804E-48
Residual	94	52237.67922	555.7199917		
Total	95	498678.7396			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	3969.398569	126.0486284	31.49100961	9.82679E-52	3719.126062	4219.671075	3719.126062	4219.671075
Month	-0.080850065	0.002852504	-28.34353766	7.6804E-48	-0.08651378	-0.075186351	-0.08651378	-0.075186351

Commercial - LCPA SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.024678156
R Square	0.000609011
Adjusted R Square	-0.010022808
Standard Error	7.354179264
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	3.098034667	3.098034667	0.057281957	0.811365748
Residual	94	5083.891549	54.08395265		
Total	95	5086.989583			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	48.08674743	39.32279017	1.222872213	0.224435037	-29.98957426	126.1630691	-29.98957426	126.1630691
Month	-0.000212981	0.000889882	-0.239336494	0.811365748	-0.001979863	0.001553901	-0.001979863	0.001553901

RETAIL - Comm - Res E

Account Forecasting - Regression Results

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.307745901
R Square	0.09470754
Adjusted R Square	0.085076769
Standard Error	9.692852003
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	923.9036185	923.9036185	9.833848305	0.00228712
Residual	94	8831.429715	93.95137995		
Total	95	9755.333333			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-110.9132814	51.82767129	-2.140039841	0.034940641	-213.8183377	-8.00822512	-213.8183377	-8.00822512
Month	0.003677999	0.00117287	3.135896731	0.00228712	0.001349238	0.00600676	0.001349238	0.00600676

Retail - Comm - SPCA LL

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.667230516
R Square	0.445196561
Adjusted R Square	0.439294397
Standard Error	140.8926545
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	1497328.921	1497328.921	75.42937512	1.14555E-13
Residual	94	1865969.569	19850.74009		
Total	95	3363298.49			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	1253.388482	753.3529019	1.663746802	0.099493539	-242.4113651	2749.188328	-242.4113651	2749.188328
Month	0.148066536	0.017048519	8.685008642	1.14555E-13	0.114216302	0.18191677	0.114216302	0.18191677

Retail - Comm - SPCA UL

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.810850464
R Square	0.657478475
Adjusted R Square	0.653834629
Standard Error	68.05045599
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	835571.4709	835571.4709	180.4353075	1.3592E-23
Residual	94	435301.2687	4630.864561		
Total	95	1270872.74			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-2393.165391	363.8657294	-6.577056307	2.68168E-09	-3115.629326	-1670.701455	-3115.629326	-1670.701455
Month	0.11060891	0.00823435	13.43262102	1.3592E-23	0.094259414	0.126958406	0.094259414	0.126958406

Retail - Comm - LCPA

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.281400748
R Square	0.079186381

Account Forecasting - Regression Results

Adjusted R Square	0.069390491
Standard Error	18.05369997
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	2634.747834	2634.747834	8.083633496	0.005479656
Residual	94	30637.99175	325.9360824		
Total	95	33272.73958			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	162.5375514	96.53311812	1.683749107	0.095548364	-29.13121752	354.2063204	-29.13121752	354.2063204
Month	0.00621109	0.002184563	2.843173139	0.005479656	0.00187359	0.010548591	0.00187359	0.010548591

Industrial - SVIS MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.295273434
R Square	0.087186401
Adjusted R Square	0.060338942
Standard Error	3.383078604
Observations	36

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	37.16804692	37.16804692	3.24747311	0.080405964
Residual	34	389.1375086	11.44522084		
Total	35	426.3055556			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-83.7087089	80.38022187	-1.041409279	0.305034614	-247.0609734	79.64355565	-247.0609734	79.64355565
Month	0.003212142	0.001782469	1.802074668	0.080405964	-0.000410271	0.006834554	-0.000410271	0.006834554

Industrial - IVIS MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.155430156
R Square	0.024158533
Adjusted R Square	-0.004542686
Standard Error	5.135797973
Observations	36

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	22.20169205	22.20169205	0.841724971	0.365366413
Residual	34	896.798308	26.37642082		
Total	35	919			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	379.4488055	122.02394	3.109625911	0.003776139	131.4663234	627.4312875	131.4663234	627.4312875
Month	-0.002482578	0.002705937	-0.917455705	0.365366413	-0.007981704	0.003016549	-0.007981704	0.003016549

Industrial - SVIS SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.884592211
R Square	0.782503381
Adjusted R Square	0.776106421
Standard Error	1.153194164
Observations	36

ANOVA

Account Forecasting - Regression Results

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	162.6737583	162.6737583	122.3242688	8.31118E-13
Residual	34	45.21513054	1.329856781		
Total	35	207.8888889			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	316.9741313	27.39930508	11.56869236	2.46208E-13	261.292044	372.6562186	261.292044	372.6562186
Month	-0.006719989	0.000607592	-11.06003024	8.31118E-13	-0.007954765	-0.005485213	-0.007954765	-0.005485213

Industrial - IVIS SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.670133417
R Square	0.449078796
Adjusted R Square	0.432875231
Standard Error	0.59213777
Observations	36

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	9.717566169	9.717566169	27.71481467	7.79116E-06
Residual	34	11.92132272	0.350627139		
Total	35	21.63888889			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-70.8692173	14.06889136	-5.037299351	1.53681E-05	-99.46064452	-42.27779009	-99.46064452	-42.27779009
Month	0.001642436	0.000311984	5.264486173	7.79116E-06	0.001008408	0.002276465	0.001008408	0.002276465

Retail - Industrial - Res E

SUMMARY OUTPUT

Regression Statistics	
Multiple R	1
R Square	1
Adjusted R Square	1
Standard Error	0
Observations	36

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	0	0	#NUM!	#NUM!
Residual	34	0	0		
Total	35	0			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	1	0	65535	#NUM!	1	1	1	1
Month	0	0	65535	#NUM!	0	0	0	0

Retail - Industrial SVIS

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.443757246
R Square	0.196920494
Adjusted R Square	0.173300508
Standard Error	3.430738986
Observations	36

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	98.12657599	98.12657599	8.337028565	0.006708433
Residual	34	400.1789796	11.76996999		
Total	35	498.3055556			

Account Forecasting - Regression Results

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-118.2141169	81.51260822	-1.450255604	0.156150515	-283.8676674	47.4394336	-283.8676674	47.4394336
Month	0.00521919	0.00180758	2.887391308	0.006708433	0.001545746	0.008892634	0.001545746	0.008892634

Retail - Industrial IVIS

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.267242492
R Square	0.071418549
Adjusted R Square	0.04410733
Standard Error	3.665667717
Observations	36

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	35.13792635	35.13792635	2.614989435	0.115100079
Residual	34	456.8620737	13.43711981		
Total	35	492			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	200.502929	87.09439504	2.302133552	0.027578848	23.50582291	377.5000351	23.50582291	377.5000351
Month	-0.003123186	0.001931359	-1.617092896	0.115100079	-0.007048179	0.000801807	-0.007048179	0.000801807

Pub Auth - SCPA LL MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.961062285
R Square	0.923640715
Adjusted R Square	0.921394854
Standard Error	5.39773068
Observations	36

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	11982.36534	11982.36534	411.2634685	1.43852E-20
Residual	34	990.6068806	29.13549649		
Total	35	12972.97222			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-2470.772377	128.2473275	-19.26568316	7.18311E-20	-2731.402304	-2210.14245	-2731.402304	-2210.14245
Month	0.057674134	0.002843944	20.27963186	1.43852E-20	0.051894545	0.063453724	0.051894545	0.063453724

Pub Auth - SCPA UL MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.915738711
R Square	0.838577387
Adjusted R Square	0.833829663
Standard Error	5.627044147
Observations	36

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	5592.658944	5592.658944	176.6272433	5.06217E-15
Residual	34	1076.563278	31.66362583		
Total	35	6669.222222			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-1639.510149	133.6956985	-12.2629985	4.92654E-14	-1911.212498	-1367.8078	-1911.212498	-1367.8078
Month	0.039402064	0.002964764	13.29011826	5.06217E-15	0.033376939	0.04542719	0.033376939	0.04542719

Account Forecasting - Regression Results

Pub Auth - LCPA MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.371091012
R Square	0.137708539
Adjusted R Square	0.112347026
Standard Error	3.249003775
Observations	36

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	57.31735426	57.31735426	5.429823385	0.025866936
Residual	34	358.904868	10.55602553		
Total	35	416.2222222			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	440.0966786	77.19467231	5.701127622	2.10605E-06	283.2182297	596.9751276	283.2182297	596.9751276
Month	-0.003988897	0.001711828	-2.330198143	0.025866936	-0.00746775	-0.000510045	-0.00746775	-0.000510045

Industrial - SCPA LL SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.93400295
R Square	0.872361511
Adjusted R Square	0.868607438
Standard Error	2.718761822
Observations	36

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	1717.655583	1717.655583	232.3773313	9.17485E-17
Residual	34	251.3166388	7.391665846		
Total	35	1968.972222			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	1021.20631	64.59639401	15.80902967	3.08849E-17	889.9306426	1152.481977	889.9306426	1152.481977
Month	-0.02183624	0.001432455	-15.24392769	9.17485E-17	-0.024747338	-0.018925141	-0.024747338	-0.018925141

Industrial - SCPA UL SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.820337186
R Square	0.672953099
Adjusted R Square	0.663334073
Standard Error	0.826408423
Observations	36

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	47.77967004	47.77967004	69.96062433	9.15584E-10
Residual	34	23.22032996	0.682950881		
Total	35	71			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-145.0616343	19.63504256	-7.387895078	1.4497E-08	-184.9648417	-105.1584269	-184.9648417	-105.1584269
Month	0.003641928	0.000435416	8.364246788	9.15584E-10	0.002757056	0.0045268	0.002757056	0.0045268

Pub Auth - LCPA SATC

SUMMARY OUTPUT

Regression Statistics

Account Forecasting - Regression Results

Multiple R	0.812399322
R Square	0.659992659
Adjusted R Square	0.649992443
Standard Error	0.321026137
Observations	36

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	6.80159101	6.80159101	65.99784082	1.78863E-09
Residual	34	3.503964546	0.103057781		
Total	35	10.30555556			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-59.60178147	7.627417258	-7.814149856	4.28296E-09	-75.10255832	-44.10100463	-75.10255832	-44.10100463
Month	0.00137409	0.000169142	8.123905515	1.78863E-09	0.001030353	0.001717827	0.001030353	0.001717827

Retail - Pub Auth - Res E

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.834873621
R Square	0.697013963
Adjusted R Square	0.688102609
Standard Error	0.591204794
Observations	36

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	27.33843654	27.33843654	78.21639227	2.45736E-10
Residual	34	11.88378568	0.349523108		
Total	35	39.22222222			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-119.5039958	14.04672432	-8.507605983	6.16158E-10	-148.0503742	-90.95761747	-148.0503742	-90.95761747
Month	0.002754842	0.000311493	8.844003181	2.45736E-10	0.002121813	0.003387871	0.002121813	0.003387871

Retail - Pub Auth - SPCA LL

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.761399411
R Square	0.579729063
Adjusted R Square	0.567368153
Standard Error	10.39943978
Observations	36

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	5072.178398	5072.178398	46.90019315	6.96672E-08
Residual	34	3677.043824	108.1483478		
Total	35	8749.222222			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	2100.81311	247.0853843	8.50237709	6.25096E-10	1598.675195	2602.951026	1598.675195	2602.951026
Month	-0.037523822	0.005479233	-6.848371569	6.96672E-08	-0.048658963	-0.026388681	-0.048658963	-0.026388681

Retail - Pub Auth SPCA UL

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.943628905
R Square	0.89043551
Adjusted R Square	0.887213025
Standard Error	4.752430096
Observations	36

Account Forecasting - Regression Results

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	6240.839878	6240.839878	276.3195195	6.7783E-18
Residual	34	767.9101216	22.58559181		
Total	35	7008.75			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	2035.179442	112.9153148	18.02394516	5.68499E-19	1805.707913	2264.65097	1805.707913	2264.65097
Month	-0.041622803	0.002503949	-16.62286135	6.7783E-18	-0.046711441	-0.036534166	-0.046711441	-0.036534166

Retail - Pub Auth LCPA

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.524675706
R Square	0.275284596
Adjusted R Square	0.253969437
Standard Error	3.588992751
Observations	36

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	166.3560108	166.3560108	12.91496802	0.001019553
Residual	34	437.9495448	12.88086896		
Total	35	604.3055556			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	345.5790454	85.27263695	4.052637021	0.000278398	172.2841972	518.8738936	172.2841972	518.8738936
Month	-0.00679562	0.00189096	-3.593740116	0.001019553	-0.010638513	-0.002952726	-0.010638513	-0.002952726

MCF/Account Forecasting - Regression Results

Cumulative Regular Residential

SUMMARY OUTPUT

Residential - Res MMT
Residential - SATS SATC
Retail - Res - Res E
Retail - Res - LIRA

Regression Statistics	
Multiple R	0.998096332
R Square	0.996196289
Adjusted R Square	0.99610237
Standard Error	0.365986968
Observations	84

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	2841.539163	1420.769582	10606.99605	9.9633E-99
Residual	81	10.84966334	0.133946461		
Total	83	2852.388827			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	2.148347729	0.358243517	5.996892142	5.359E-08	1.435555504	2.861139954	1.435555504	2.861139954
Actual Degree Days	0.014614242	0.000100565	145.3214093	1.0587E-99	0.014414149	0.014814334	0.014414149	0.014814334
Forecast Price	-0.1128701	0.045829487	-2.46282699	0.015904742	-0.204056402	-0.02168379	-0.2040564	-0.02168379

Residential - SPCA LL MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.957003649
R Square	0.915855985
Adjusted R Square	0.913417028
Standard Error	2.877870395
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	6220.073378	3110.036689	375.5113337	8.19033E-38
Residual	69	571.4675225	8.282138008		
Total	71	6791.5409			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	15.07821724	2.899235202	5.200756816	1.93265E-06	9.294401265	20.86203321	9.294401265	20.86203321
Actual Degree Days	0.024059949	0.000881173	27.30445111	1.03167E-38	0.022302057	0.025817842	0.022302057	0.025817842
Forecast Price	-1.52449065	0.374048752	-4.07564694	0.000120926	-2.270697494	-0.77828381	-2.27069749	-0.77828381

Residential - SPCA UL MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.98799125
R Square	0.976126711
Adjusted R Square	0.975434731
Standard Error	4.120532272
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	47901.56086	23950.78043	1410.62972	1.09137E-56

MCF/Account Forecasting - Regression Results

Residual	69	1171.536248	16.9787862
Total	71	49073.09711	

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-116.296926	34.59826247	-3.36135162	0.001267658	-185.3185706	-47.2752804	-185.318571	-47.2752804
Actual Degree Days	0.0673531	0.001270876	52.99737595	1.22792E-57	0.064817772	0.069888429	0.064817772	0.069888429
Month	0.002857478	0.000774794	3.688047769	0.000446585	0.001311806	0.00440315	0.001311806	0.00440315

Residential - LCPA MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.965058068
R Square	0.931337075
Adjusted R Square	0.929346845
Standard Error	71.10799423
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	4732281.161	2366140.581	467.9545636	7.3607E-41
Residual	69	348887.9322	5056.346843		
Total	71	5081169.093			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	120.2409597	12.81735835	9.381103068	6.07072E-14	94.67102946	145.81089	94.67102946	145.81089
Actual Degree Days	0.827625874	0.037018138	22.35730722	2.5181E-33	0.75377671	0.901475037	0.75377671	0.901475037
Winter	-169.228411	28.9591961	-5.84368469	1.53174E-07	-227.0004265	-111.456396	-227.000427	-111.456396

Residential - SPCA LL SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.695842658
R Square	0.484197005
Adjusted R Square	0.469246193
Standard Error	7.021597123
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	3193.44282	1596.72141	32.38600167	1.20418E-10
Residual	69	3401.895005	49.30282616		
Total	71	6595.337825			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-316.972389	58.95720363	-5.37631315	9.76914E-07	-434.5887924	-199.355986	-434.588792	-199.355986
Actual Degree Days	0.014278669	0.002165638	6.59328589	7.20225E-09	0.00995834	0.018598998	0.00995834	0.018598998
Month	0.007219026	0.001320289	5.467763232	6.82555E-07	0.004585122	0.00985293	0.004585122	0.00985293

Retail - Res - LL

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.982879803

MCF/Account Forecasting - Regression Results

R Square	0.966052707
Adjusted R Square	0.965068727
Standard Error	1.368188716
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	3675.672142	1837.836071	981.7813149	2.05484E-51
Residual	69	129.1638851	1.871940363		
Total	71	3804.836027			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-94.5600996	11.48806736	-8.23115818	7.55104E-12	-117.4781669	-71.6420323	-117.478167	-71.6420323
Actual Degree Days	0.018672867	0.000421984	44.25018429	2.19535E-52	0.017831032	0.019514701	0.017831032	0.019514701
Month	0.002142612	0.000257264	8.32845519	5.01284E-12	0.001629384	0.002655839	0.001629384	0.002655839

Retail - Res - UL

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.90728687
R Square	0.823169465
Adjusted R Square	0.818043942
Standard Error	11.65895159
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	43661.64346	21830.82173	160.6020502	1.09831E-26
Residual	69	9379.249504	135.9311522		
Total	71	53040.89296			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-307.387045	97.89499042	-3.13996705	0.002487396	-502.682207	-112.091882	-502.682207	-112.091882
Actual Degree Days	0.064378721	0.003595915	17.90329396	1.22654E-27	0.057205067	0.071552375	0.057205067	0.071552375
Month	0.007115263	0.002192262	3.245625998	0.001809371	0.00274182	0.011488707	0.00274182	0.011488707

Retail - Res - LCPA

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.680877411
R Square	0.463594049
Adjusted R Square	0.439929081
Standard Error	75.38600019
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	333990.8591	111330.2864	19.58988668	2.92281E-09
Residual	68	386447.3337	5683.049024		
Total	71	720438.1928			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-3396.00106	638.9777154	-5.31474099	1.27838E-06	-4671.061234	-2120.94088	-4671.06123	-2120.94088
Actual Degree Days	0.125984551	0.023293434	5.408586432	8.87512E-07	0.079503227	0.172465875	0.079503227	0.172465875
Month	0.071307626	0.014177821	5.029519403	3.82025E-06	0.043016225	0.099599028	0.043016225	0.099599028

MCF/Account Forecasting - Regression Results

Forecast Price	29.92775306	9.800166767	3.053800386	0.003224397	10.37182475	49.48368136	10.37182475	49.48368136

Commercial - Res MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.733937527
R Square	0.538664293
Adjusted R Square	0.525292244
Standard Error	6.03593333
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	2935.209315	1467.604658	40.28285222	2.56206E-12
Residual	69	2513.84189	36.43249116		
Total	71	5449.051206			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-124.537726	50.68102658	-2.45728499	0.016516725	-225.6436076	-23.4318444	-225.643608	-23.4318444
Actual Degree Days	0.016506287	0.001861634	8.866557601	5.22087E-13	0.012792428	0.020220145	0.012792428	0.020220145
Month	0.002936532	0.001134952	2.587362551	0.011781168	0.000672365	0.005200699	0.000672365	0.005200699

Commercial - SCPA LL MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.981086591
R Square	0.962530899
Adjusted R Square	0.961995626
Standard Error	1.90701925
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	6539.57612	6539.57612	1798.206011	1.16001E-51
Residual	70	254.5705695	3.636722421		
Total	71	6794.146689			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	0.114973678	0.342217092	0.335967082	0.73790066	-0.567556791	0.797504147	-0.56755679	0.797504147
Actual Degree Days	0.024710631	0.000582726	42.40525924	1.16001E-51	0.023548422	0.025872841	0.023548422	0.025872841

Commercial - SCPA UL MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.991646982
R Square	0.983363737
Adjusted R Square	0.983126076
Standard Error	4.441706912
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*

MCF/Account Forecasting - Regression Results

Regression	1	81631.21194	81631.21194	4137.675695	5.22797E-64
Residual	70	1381.01322	19.72876029		
Total	71	83012.22516			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	7.960944507	0.7970701	9.987759557	4.20492E-15	6.371238319	9.550650694	6.371238319	9.550650694
Actual Degree Days	0.087304607	0.001357247	64.32476735	5.22797E-64	0.084597663	0.090011551	0.084597663	0.090011551

Commercial - LCPA MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.984624466
R Square	0.96948534
Adjusted R Square	0.968600857
Standard Error	31.01380102
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	2108588.282	1054294.141	1096.104096	5.19451E-53
Residual	69	66368.05391	961.8558537		
Total	71	2174956.336			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	96.39251076	5.590299737	17.24281618	1.02842E-26	85.24016793	107.5448536	85.24016793	107.5448536
Actual Degree Days	0.494826599	0.016145486	30.64798348	6.49157E-42	0.462617235	0.527035963	0.462617235	0.527035963
Winter	-50.9826517	12.63057347	-4.0364479	0.000138443	-76.17995636	-25.7853471	-76.1799564	-25.7853471

Commercial - Res SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.420970176
R Square	0.177215889
Adjusted R Square	0.16546183
Standard Error	12.22933597
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	2254.865039	2254.865039	15.07699535	0.000231217
Residual	70	10468.96607	149.5566582		
Total	71	12723.83111			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-57.9206978	15.99630029	-3.62088088	0.000551413	-89.82431281	-26.0170829	-89.8243128	-26.0170829
Forecast Price	8.972578074	2.310786627	3.88291068	0.000231217	4.363859467	13.58129668	4.363859467	13.58129668

Commercial - SCPA LL SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.988966392
R Square	0.978054524

MCF/Account Forecasting - Regression Results

Adjusted R Square	0.977741018
Standard Error	1.206387958
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	4540.358003	4540.358003	3119.723548	8.50351E-60
Residual	70	101.8760333	1.455371905		
Total	71	4642.234036			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	0.282417855	0.216487893	1.304543417	0.196321215	-0.149353632	0.714189343	-0.14935363	0.714189343
Actual Degree Days	0.020589893	0.000368635	55.85448548	8.50351E-60	0.019854674	0.021325111	0.019854674	0.021325111

Commercial - SCPA UL SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.993127889
R Square	0.986303004
Adjusted R Square	0.986107333
Standard Error	3.116267305
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	48949.97445	48949.97445	5040.609609	5.78946E-67
Residual	70	679.7785342	9.711121917		
Total	71	49629.75298			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	7.762115546	0.559218233	13.88029768	8.7592E-22	6.646789948	8.877441144	6.646789948	8.877441144
Actual Degree Days	0.067606005	0.000952234	70.99725071	5.78946E-67	0.065706834	0.069505176	0.065706834	0.069505176

Commercial - LCPA SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.978038342
R Square	0.956558998
Adjusted R Square	0.955938413
Standard Error	17.58614173
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	476706.539	476706.539	1541.380894	2.05923E-49
Residual	70	21649.06666	309.2723809		
Total	71	498355.6057			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	36.01928403	3.155856075	11.41347488	1.23059E-17	29.72512755	42.3134405	29.72512755	42.3134405
Actual Degree Days	0.210976748	0.005373777	39.26042402	2.05923E-49	0.200259088	0.221694407	0.200259088	0.221694407

RETAIL - Comm - Res E

MCF/Account Forecasting - Regression Results

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.985662415
R Square	0.971530397
Adjusted R Square	0.971123688
Standard Error	1.632266285
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	6364.36437	6364.36437	2388.762734	7.71409E-56
Residual	70	186.5005258	2.664293226		
Total	71	6550.864895			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	1.098476765	0.292912314	3.750189772	0.000360618	0.514281575	1.682671955	0.514281575	1.682671955
Actual Degree Days	0.024377354	0.00049877	48.87497042	7.71409E-56	0.023382589	0.025372118	0.023382589	0.025372118

Retail - Comm - SPCA LL

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.989080297
R Square	0.978279834
Adjusted R Square	0.977969546
Standard Error	1.141749291
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	4109.978008	4109.978008	3152.811433	5.92495E-60
Residual	70	91.25140108	1.303591444		
Total	71	4201.229409			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	0.143080481	0.2048884	0.698333735	0.487282017	-0.265556547	0.55171751	-0.26555655	0.55171751
Actual Degree Days	0.019589745	0.000348883	56.14990145	5.92495E-60	0.01889392	0.02028557	0.01889392	0.02028557

Retail - Comm - SPCA UL

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.991909832
R Square	0.983885114
Adjusted R Square	0.983654902
Standard Error	3.548669208
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	53820.31514	53820.31514	4273.809893	1.71483E-64
Residual	70	881.5137205	12.59305315		
Total	71	54701.82886			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	6.176586762	0.636813319	9.699211022	1.40029E-14	4.906502645	7.446670878	4.906502645	7.446670878

MCF/Account Forecasting - Regression Results

Actual Degree Days	0.07088954	0.001084363	65.37438255	1.71483E-64	0.068726847	0.073052233	0.068726847	0.073052233

Retail - Comm - LCPA

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.991991164
R Square	0.984046469
Adjusted R Square	0.983818561
Standard Error	10.86689046
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	509879.3242	509879.3242	4317.743341	1.20566E-64
Residual	70	8266.251574	118.0893082		
Total	71	518145.5757			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	60.67705503	1.950077669	31.11519915	1.00417E-42	56.78774775	64.5663623	56.78774775	64.5663623
Actual Degree Days	0.218193967	0.003320583	65.70953767	1.20566E-64	0.211571274	0.224816661	0.211571274	0.224816661

Industrial - SVIS MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.980163464
R Square	0.960720415
Adjusted R Square	0.960302547
Standard Error	9.075179857
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	189351.3766	189351.3766	2299.100655	7.05637E-68
Residual	94	7741.735607	82.35888944		
Total	95	197093.1122			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-1.17754371	1.405640576	-0.83772746	0.404308772	-3.96847602	1.613388609	-3.96847602	1.613388609
Actual Degree Days	0.112283682	0.002341734	47.94893799	7.05637E-68	0.107634113	0.116933251	0.107634113	0.116933251

Industrial - IVIS MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.945327908
R Square	0.893644853
Adjusted R Square	0.891357646
Standard Error	80.80933466
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	5102845.961	2551422.981	390.7143848	5.54972E-46

MCF/Account Forecasting - Regression Results

Residual	93	607303.8169	6530.148569
Total	95	5710149.778	

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	455.5940951	12.55966289	36.27438881	1.10548E-56	430.6530937	480.5350965	430.6530937	480.5350965
Actual Degree Days	0.660827794	0.035215833	18.76507656	2.21885E-33	0.59089613	0.730759459	0.59089613	0.730759459
Winter	-80.6214469	28.25316825	-2.8535365	0.005329269	-136.7266396	-24.5162541	-136.72664	-24.5162541

Industrial - SVIS SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.970133191
R Square	0.941158409
Adjusted R Square	0.940532435
Standard Error	8.789452177
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	116152.828	116152.828	1503.509488	1.26554E-59
Residual	94	7261.92014	77.25446957		
Total	95	123414.7481			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-3.09304672	1.361384657	-2.27198588	0.025367336	-5.796107868	-0.38998557	-5.79610787	-0.38998557
Actual Degree Days	0.087942196	0.002268006	38.77511428	1.26554E-59	0.083439017	0.092445375	0.083439017	0.092445375

Industrial - IVIS SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.850021834
R Square	0.722537118
Adjusted R Square	0.716570174
Standard Error	69.94242894
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	1184730.687	592365.3436	121.0899839	1.28537E-26
Residual	93	454950.733	4891.943366		
Total	95	1639681.42			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-1321.37252	377.4639125	-3.5006592	0.000714664	-2070.941039	-571.803995	-2070.94104	-571.803995
Actual Degree Days	0.280739816	0.018166416	15.45378134	1.98935E-27	0.244664915	0.316814717	0.244664915	0.316814717
Month	0.030537578	0.008518932	3.584672165	0.000539933	0.013620668	0.047454488	0.013620668	0.047454488

Retail - Industrial - Res E

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.676317078
R Square	0.45740479

MCF/Account Forecasting - Regression Results

Adjusted R Square	0.445736076
Standard Error	4.016170407
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	1264.538233	632.2691163	39.19924527	4.49917E-13
Residual	93	1500.055101	16.12962474		
Total	95	2764.593333			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-172.392932	21.67438875	-7.95376211	4.23286E-12	-215.4339726	-129.351892	-215.433973	-129.351892
Actual Degree Days	0.00489107	0.001043135	4.688816105	9.39395E-06	0.00281961	0.00696253	0.00281961	0.00696253
Month	0.003911803	0.000489166	7.996876968	3.44053E-12	0.002940416	0.00488319	0.002940416	0.00488319

Retail - Industrial SVIS

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.970146592
R Square	0.94118441
Adjusted R Square	0.939919559
Standard Error	8.599993072
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	110068.0876	55034.04378	744.1067124	6.04504E-58
Residual	93	6878.268918	73.95988084		
Total	95	116946.3565			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-102.5488	46.41227194	-2.20951908	0.029593564	-194.7143742	-10.3832265	-194.714374	-10.3832265
Actual Degree Days	0.086031582	0.002233709	38.51512145	5.91876E-59	0.081595879	0.090467286	0.081595879	0.090467286
Month	0.002324017	0.001047472	2.21869049	0.028940952	0.000243944	0.004404089	0.000243944	0.004404089

Retail - Industrial IVIS

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.950804362
R Square	0.904028935
Adjusted R Square	0.903007967
Standard Error	53.88000355
Observations	96

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	2570544.362	2570544.362	885.4618856	1.24809E-49
Residual	94	272887.1496	2903.054783		
Total	95	2843431.511			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	67.03761049	8.345390441	8.032890847	2.72366E-12	50.46764214	83.60757884	50.46764214	83.60757884
Actual Degree Days	0.413708995	0.013903048	29.75671161	1.24809E-49	0.386104167	0.441313823	0.386104167	0.441313823

MCF/Account Forecasting - Regression Results

Pub Auth - SCPA LL MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.982553249
R Square	0.965410887
Adjusted R Square	0.964916756
Standard Error	1.991319412
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	7747.34071	7747.34071	1953.758141	7.04934E-53
Residual	70	277.5747101	3.965353002		
Total	71	8024.91542			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	0.579011793	0.357344866	1.620316527	0.109660915	-0.13369007	1.291713656	-0.13369007	1.291713656
Actual Degree Days	0.026895856	0.000608485	44.20133642	7.04934E-53	0.02568227	0.028109441	0.02568227	0.028109441

Pub Auth - SCPA UL MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.989168713
R Square	0.978454743
Adjusted R Square	0.978146954
Standard Error	5.54009708
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	97571.24804	97571.24804	3178.974982	4.46422E-60
Residual	70	2148.487296	30.69267566		
Total	71	99719.73534			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	1.335995122	0.994177648	1.343819311	0.183346527	-0.646829676	3.31881992	-0.64682968	3.31881992
Actual Degree Days	0.095448689	0.001692881	56.38239957	4.46422E-60	0.092072345	0.098825034	0.092072345	0.098825034

Pub Auth - LCPA MMT

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.970908376
R Square	0.942663074
Adjusted R Square	0.941001134
Standard Error	86.75447545
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	8537976.547	4268988.273	567.206482	1.4655E-43
Residual	69	519317.3918	7526.339011		
Total	71	9057293.938			

MCF/Account Forecasting - Regression Results

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	140.5775641	15.63766792	8.989675752	3.11605E-13	109.3812702	171.773858	109.3812702	171.773858
Actual Degree Days	1.067753267	0.045163545	23.64192768	8.27116E-35	0.97765446	1.157852074	0.97765446	1.157852074
Winter	-178.778368	35.331328	-5.06005231	3.31857E-06	-249.2624387	-108.294297	-249.262439	-108.294297

Industrial - SCPA LL SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.979879881
R Square	0.960164581
Adjusted R Square	0.959595503
Standard Error	1.480350622
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	3697.460206	3697.460206	1687.230151	9.90481E-51
Residual	70	153.4006574	2.191437964		
Total	71	3850.860864			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	0.43418005	0.26565085	1.63440113	0.106664397	-0.095643865	0.964003964	-0.09564386	0.964003964
Actual Degree Days	0.018580645	0.000452349	41.07590718	9.90481E-51	0.017678464	0.019482827	0.017678464	0.019482827

Industrial - SCPA UL SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.983446796
R Square	0.9671676
Adjusted R Square	0.966215936
Standard Error	6.910811252
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	97074.7455	48537.37275	1016.291286	6.49293E-52
Residual	69	3295.392539	47.75931216		
Total	71	100370.138			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	166.1361759	58.02698433	2.863084785	0.005551653	50.37550961	281.8968423	50.37550961	281.8968423
Actual Degree Days	0.094190871	0.002131469	44.1905977	2.40174E-52	0.089938707	0.098443034	0.089938707	0.098443034
Month	-0.00370163	0.001299457	-2.84859492	0.00578247	-0.006293974	-0.00110928	-0.00629397	-0.00110928

Pub Auth - LCPA SATC

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.806116902
R Square	0.649824459
Adjusted R Square	0.639674443
Standard Error	64.87095688
Observations	72

MCF/Account Forecasting - Regression Results

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	538840.1452	269420.0726	64.02201529	1.8961E-16
Residual	69	290368.6322	4208.241046		
Total	71	829208.7774			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	2731.902157	544.6923466	5.015495765	3.93349E-06	1645.270658	3818.533657	1645.270658	3818.533657
Actual Degree Days	0.1877311	0.02000784	9.38287686	6.02601E-14	0.147816551	0.22764565	0.147816551	0.22764565
Month	-0.06089651	0.012197851	-4.99239691	4.29486E-06	-0.085230557	-0.03656247	-0.08523056	-0.03656247

Retail - Pub Auth - Res E

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.868039012
R Square	0.753491726
Adjusted R Square	0.742616361
Standard Error	2.805172337
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	3	1635.592062	545.1973541	69.28426983	1.21833E-20
Residual	68	535.0914452	7.868991842		
Total	71	2170.683508			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	-103.752486	23.6989184	-4.37794181	4.23285E-05	-151.042941	-56.4620302	-151.042941	-56.4620302
Actual Degree Days	0.011426519	0.000869301	13.1444968	2.42152E-20	0.009691856	0.013161181	0.009691856	0.013161181
Month	0.002025155	0.000527718	3.837568823	0.000274844	0.00097211	0.0030782	0.00097211	0.0030782
Forecast Price	2.247359707	0.532764394	4.218299369	7.45186E-05	1.184244911	3.310474503	1.184244911	3.310474503

Retail - Pub Auth - SPCA LL

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.988622421
R Square	0.977374291
Adjusted R Square	0.976718473
Standard Error	1.097520968
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	2	3590.322489	1795.161245	1490.314104	1.71307E-57
Residual	69	83.11410696	1.204552275		
Total	71	3673.436596			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	22.25688322	9.215391605	2.41518583	0.018380893	3.872679991	40.64108645	3.872679991	40.64108645
Actual Degree Days	0.018181247	0.000338503	53.71071404	4.98732E-58	0.017505951	0.018856542	0.017505951	0.018856542
Month	-0.00049601	0.00020637	-2.40350439	0.018930473	-0.000907707	-8.4314E-05	-0.00090771	-8.4314E-05

Retail - Pub Auth SPCA UL

MCF/Account Forecasting - Regression Results

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.990824008
R Square	0.981732215
Adjusted R Square	0.981471247
Standard Error	4.600167716
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	79607.23277	79607.23277	3761.882236	1.38273E-62
Residual	70	1481.308011	21.16154302		
Total	71	81088.54078			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	0.582523082	0.825506098	0.705655699	0.482744081	-1.063896915	2.22894308	-1.06389692	2.22894308
Actual Degree Days	0.08621549	0.001405668	61.33418489	1.38273E-62	0.083411974	0.089019006	0.083411974	0.089019006

Retail - Pub Auth LCPA

SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.986113194
R Square	0.972419231
Adjusted R Square	0.970772618
Standard Error	25.9391362
Observations	72

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	4	1589399.207	397349.8018	590.5572176	1.93349E-51
Residual	67	45080.19872	672.8387868		
Total	71	1634479.406			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	679.8815716	221.1538666	3.074246823	0.003051973	238.4566065	1121.306537	238.4566065	1121.306537
Actual Degree Days	0.414771046	0.0138528	29.9413149	1.64894E-40	0.387120741	0.44242135	0.387120741	0.44242135
Month	-0.0127895	0.004930637	-2.59388374	0.011644834	-0.022631092	-0.00294791	-0.02263109	-0.00294791
Winter	-31.3533218	10.69763037	-2.93086606	0.004619214	-52.70588139	-10.0007622	-52.7058814	-10.0007622
Forecast Price	-12.2281682	4.939059639	-2.47580897	0.015827295	-22.08657245	-2.36976385	-22.0865725	-2.36976385

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-12:

In the form identical to the previous question, please provide a database for all independent variables which were analyzed by the Company, but exclude from the filed gas demand models.

Response:

The Company did not analyze any independent variables which were excluded from the filed gas demand models.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-13:

For each customer receiving service at less than the maximum applicable tariff rate, please provide:

a. Actual consumption for the two most recent calendar years;
b. Actual consumption for the HTY and the most recent twelve month period for which data is available;
c. The currently applicable rate;
d. An explanation for the rate discount.

Response:

Information related to customer-specific usage and rate information is HIGHLY CONFIDENTIAL PROTECTED MATERIAL. The Company is providing HIGHLY CONFIDENTIAL PROTECTED SDR-RR-13 (Pages 2 through 36 of this response) in a separately sealed envelope that is marked "HIGHLY CONFIDENTIAL PROTECTED MATERIAL". The Company hereby requests that the content of such envelope be placed in the Commission's NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such HIGHLY CONFIDENTIAL PROTECTED MATERIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-14:

Please provide a copy of the Company's detailed capital budgets for the preceding and current calendar years which underlie the projected test year capital additions in this case.
Response:

Fiscal 2025 Capital Budget

Production Plant		266,000
Transmission Plant		
	Land and Land Rights	850,000
	Structures	10,000
	Replacements	11,250,000
	Cathodic Protection	100,000
	Meas & Reg. Stations	380,000
Distribution Plant		
	Land and Land Rights	1,100,000
	Structures & Improvements	40,000
	Distribution Mains	21,325,000
	Meas & Reg. Stations	790,000
	Services	8,990,000
	Meas & Reg. Equipment	1,456,000
	Industrial Meas & Reg. Equipment	550,000
General Plant		10,997,000
Total		58,104,000

Fiscal 2026 Capital Budget

Production Plant		438,000
Transmission Plant		
	Land and Land Rights	850,000
	Replacements	11,100,000
	Cathodic Protection	435,000
	Meas & Reg. Stations	845,000
Distribution Plant		
	Land and Land Rights	900,000
	Structures & Improvements	40,000
	Distribution Mains	30,219,000
	Meas & Reg. Stations	1,140,000
	Services	9,564,000
	Meas & Reg. Equipment	1,704,000
	Industrial Meas & Reg. Equipment	950,000
General Plant		10,047,000
Total		68,232,000

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-15:

Please provide a variance or other similar report comparing actual and budgeted construction expenditures at the conclusion of each budget period for the past three years and as of the most recent date available.
Response:

Fiscal 2023	Budget	Actual
Production Plant	150,000	110,000
Transmission Plant	2,352,000	1,685,000
Distribution Plant	32,137,000	36,486,000
General Plant	11,882,000	8,041,000
Total Plant	46,521,000	46,322,000

Fiscal 2024	Budget	Actual
Production Plant	231,000	103,000
Transmission Plant	7,610,000	6,010,000
Distribution Plant	36,690,000	43,620,000
General Plant	12,051,000	10,343,000
Total Plant	56,582,000	60,076,000

Fiscal 2025	Budget	Actual
Production Plant	266,000	143,000
Transmission Plant	12,590,000	10,911,000
Distribution Plant	34,251,000	32,845,000
General Plant	10,997,000	11,502,000
Total Plant	58,104,000	55,401,000

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-16:

Please provide a breakdown of other gas revenue for the three preceding calendar years.

Response:

Other Gas Revenue (FERC Account 495)

GL Account	2022	2023	2024
495000 - Other Gas Revenues	2,288	2,822	2,568
495005 - Capacity Release Revenues	432,415	472,853	257,084
495010 - Refund Revenues	(3,766,641)	(289,642)	20,393
495500 - Gas Royalties	11	39	16
495804 - Customer Billing Service Charges	44,994	43,137	42,889
495810 - Non-Refundable Application Fees	2,500	500	2,000
495990 - Rev Sale of Inventory Material	2,091	1,055	1,055
Total	(3,282,343)	230,763	326,004

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-17:

For those items for which data is available, please provide the following actual monthly balance by account for the historic and future test periods to present:

a. Depreciable utility plant in service;
b. Nondepreciable utility plan in service;
c. Construction work in progress;
d. Accumulated deferred income tax;
e. Materials and supplies;
f. Customer advances for construction;
g. Contributions in aid of construction;
h. Accumulated depreciation;
i. Prepayments by type;
j. Customer deposits;
k. Injury and damages reserve.

Response:

Please see attached exhibit on page 2.

National Fuel Gas Distribution Pennsylvania Division
Actual Balances (in Thousands)
October 2024 thru September 2025

	[3] October 2024	[4] November 2024	[5] December 2024	[6] January 2025	[7] February 2025	[8] March 2025	[9] April 2025	[10] May 2025	[11] June 2025	[12] July 2025	[13] August 2025	[14] September 2025
(a) **Depreciable Plant**	777,369	778,805	789,588	781,827	784,945	798,220	791,860	793,792	810,475	802,893	805,473	824,085
(b) **Non Depreciable Plant**	1,155	1,155	1,155	1,155	1,155	1,155	1,155	1,155	1,155	1,155	1,155	1,155
(c) **Construction Work in Progress**	27,794	29,167	20,787	32,268	30,876	19,025	28,014	29,645	18,051	28,430	30,100	24,647
(d) **Accumulated Deferred Income Tax**	(76,824)	(76,711)	(76,561)	(76,460)	(76,328)	(76,168)	(76,039)	(75,896)	(75,606)	(75,337)	(75,238)	(75,238)
(e) **Materials and Supplies**	1,490	1,499	1,509	1,523	1,410	1,491	1,506	1,586	1,639	1,705	1,677	1,668
(f) **Customer Advances**	(61)	(61)	(61)	(61)	(61)	(60)	(60)	(60)	(60)	(60)	(60)	(49)
(g) **Contributions in Aid of Construction**	1	178	24	22	5	9	-	17	15	22	-	6
(h) **Accumulated Depreciation**	83,660	84,275	84,581	84,771	85,307	85,537	86,474	86,649	87,073	87,416	87,705	88,036
(i) **Prepayment by type**												
Insurance	472	393	312	235	153	67	0	969	898	811	712	619
PUC Annual Assessment	666	586	507	427	347	267	187	107	27	(53)	(133)	731
Prepaid IT Services	62	53	44	35	27	18	9	0	98	96	87	77
AGA Dues	23	12	(0)	(13)	13	(0)	25	13	(0)	(13)	(25)	(0)
(j) **Gas Customer Deposits**	(5,198)	(5,126)	(5,194)	(5,170)	(5,135)	(5,114)	(5,135)	(5,166)	(5,156)	(5,133)	(5,137)	(5,144)
(k) **Injury and Damage Reserve**	(197)	(197)	(219)	(195)	(195)	(167)	(167)	(167)	(166)	(166)	(166)	(289)

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-18:

Please provide a copy of all workpapers supporting the Company's lead/lag study.

Response:

Please refer to National Fuel's Exhibit A (Historic), Exhibit A (Future) and Exhibit A (Fully Projected), Schedule C-4, and the direct Testimony of Monika M. Duszenko Statement No. 6.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-19:

Please provide the payroll distribution showing the percentage of wages charged to O&M and other categories for each of the preceding three calendar years and the most recent annual period available.

Response:

	CY 2022	CY 2023	CY 2024	HTY*
Operating & Maintenance (O&M) Labor	76.21%	76.04%	73.80%	74.49%
Construction & Retirements (CAR) Labor	10.06%	11.12%	12.55%	11.71%
Other Income & Deductions (OID) Labor	0.08%	0.08%	0.11%	0.12%
Undistributed (UND) Labor	1.95%	1.68%	1.73%	2.47%
Intercompany Expense (ITC) Labor	11.70%	11.07%	11.82%	11.21%
Total	**100.00%**	**100.00%**	**100.00%**	**100.00%**

This includes labor that PA Division borrowed from affiliates.

*Historical Test Year -12 months ended September 30, 2025.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-20:

Please state whether the future test year budgeted labor includes any increases or decreases in the number of employees during the future test year. If increases have been budgeted, please state whether the future test year includes budgeted positions which have not been filled.

Response:
To determine the fully projected future test year labor forecast, the Company first started with the actual headcount as of 9/30/25 which was 436 employees. The Company then utilized the approved budgeted headcount of 453 employees for the future test year and added another 6 positions for the FPFTY (459 total). Below is a breakdown of the 23 open positions:

- 9 Union Hourly Field Employees
- 10 Non-Union Hourly Call Center Representatives
- 4 Salaried Employees

As described in RR-21, the Company has developed a methodology to account for the fact that it has historically operated at less than 100% of budgeted headcount. As such, and as detailed in RR-21, the FTY and FPFTY labor forecast was reduced by 9 employees per year to arrive at a headcount level of 444 employees for the FTY and 450 employees for the FPFTY.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-21:

Please explain how the Company has treated routine or normal position vacancies which occur as a result of terminations or retirements in its budgeted labor projections.

Response:

As part of the Company's annual budget process, each department submits a proposed headcount which incorporates the number of individuals necessary to effectively operate the division. As it is understood that there will be some level of terminations and retirements that occur, the Company has developed a labor adjustment that reduces the budgeted labor amount to account for these dynamics. The adjustment considers that staffing levels will not be at 100% as presented in the annual budgets and makes an adjustment on the wage rate assumed for the new hires who are replacing employees who are projected to retire. Details of the adjustment calculation can be found on pg.2 of this response. These adjustment amounts are included in the calculation of the FTY and FPFTY labor figures.

Retirements

	FY 2023	FY 2024	FY 2025	AVG
PAD				
Supv	1	1	2	1
Hourly	8	2	4	5
Total	9	3	6	6

Headcount Differential

PAD	FY 2023	FY 2024	FY 2025	AVG
Avg. Non Exec Labor Budget	433	444	446	
Average Actual Count	419	437	441	
Differential	14	7	5	
	3.2%	1.6%	1.1%	2.0%
Projected Supv. Retirements	1			
Avg. Rate Retirees	$ 57.69			
Avg. Rate New Hire	$ 31.25			
Duration (hours)	1,040			
O&M %	73.14%			
O&M Labor Savings	$ 26,818			
Projected Hourly Retirements	5			
Avg. Rate Retirees	$ 39.44			
Avg. Rate New Hire	$ 33.91			
Duration (hours)	1,040			
O&M %	73.14%			
O&M Labor Savings	$ 19,630			
	FTY	FPFTY		
Proposed Non-Executive Headcount FY26	453	459		
Forecasted Staffing Level	98.0%	98.0%		
Forecasted Headcount for RR	444	450		
Headcount Differential	9	9		
O&M Factor	73.14%	73.14%		
Avg. Wage Rate	$ 67,766	$ 67,766		
Labor Savings	$ 446,079	$ 446,079		

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-22:
Please provide the most recent insurance premiums for each type of insurance coverage (i.e., employee benefit and those purchased by the Company) reflected in the Company's filing. If available, please provide estimated premiums for the subsequent calendar year.

Response:

Group Life Insurance
Term Insurance Rate = $0.072 / $1,000
AD&D Insurance Rate = $0.020 / $1,000

Health Insurance (Self Insured)
Estimated claims paid per employee per month in the first year rates will be in effect equal to $1,619.41 plus a monthly administrative fee per employee of $69.97 to produce a total monthly cost per employee of $1,689.38.

Carved Out Pharmacy Benefit
Estimated claims paid per employee per month in the first year rates will be in effect equal to $162.04 plus a monthly administrative fee per employee of $4.12 to produce a total monthly cost per employee of $166.16.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-23:
Please provide a copy of the Company's two most recent FERC Form 2.

Response:
National Fuel Gas Distribution Corporation is not required to prepare FERC Form 2.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-24:

Please provide a description of each employee benefit program or plan.

Response:

Information related to the descriptions of the Company's benefit programs are HIGHLY CONFIDENTIAL PROTECTED MATERIAL. The Company is providing CONFIDENTIAL Attachment SDR-RR-024 in a separately sealed envelope that is marked "HIGHLY CONFIDENTIAL PROTECTED MATERIAL". The Company hereby requests that the content of such envelope be placed in the Commission's NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such HIGHLY CONFIDENTIAL PROTECTED MATERIAL to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-25:

Please provide a description of the Company's merit and cost of living wage rate increase policies.

Response:
The Company is providing Attachment SDR-RR-25 in a separately sealed envelope marked “HIGHLY CONFIDENTIAL PROTECTED MATERIAL.” The Company hereby requests that the content of such envelope be placed in the Commission’s NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such HIGHLY CONFIDENTIAL PROTECTED MATERIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-26:

Please provide the following monthly labor data for the year prior to the HTY, the HTY and the FTY through the most recent date available.

a. Number of actual employees broken down between type (e.g., salaried, hourly, union, non-union, temporary, etc.);
b. Regular payroll broken down between expensed, capitalized and other;
c. Overtime payroll broken down between expensed, capitalized and other;
d. Temporary payroll broken down between expensed, capitalized and other; and
e. Other payroll (specify).

Response:

RR - 26 a Response

Employee Count	Prior HTY	HTY (Per Book at 9/30/2025)	HTY (Per Book at 9/30/2025)	FTY
Salaried	123	122	122	123
Hourly Union	203	210	210	212
Hourly Non-Union	110	104	104	109
Temporary	0	0	0	0
Total	**436**	**436**	**436**	**444**

RR - 26 b Response (Includes Affiliate Labor)

Regular Payroll	Prior HTY (Per Book)	HTY (Per Book)	HTY (Normalized)	FTY
Operating & Maintenance (O&M) Payroll	31,523,967.16	33,692,341.44	34,222,197.01	36,945,065.83
Other Income & Deductions (OID) Payroll	39,783.57	53,136.61	50,457.90	54,115.75
Undistributed (UND) Payroll	674,868.29	1,143,247.48	1,093,849.71	1,170,215.69
Intercompany Expense (ITC) Payroll	5,103,478.64	5,163,772.46	4,748,498.39	5,147,874.20
Constructions & Retirement (CAR) Payroll	5,190,251.63	5,206,987.09	4,992,430.52	5,383,069.93
Total	**42,532,349.29**	**45,259,485.08**	**45,107,433.52**	**48,700,341.40**

RR - 26 c Response (Includes Affiliate Labor)

Overtime Payroll	Prior HTY (Per Book)	HTY (Per Book)	HTY (Normalized)	FTY
Operating & Maintenance (O&M) Payroll	739,544.04	876,980.96	876,980.91	952,620.52
Other Income & Deductions (OID) Payroll	233.25	575.19	575.19	624.80
Undistributed (UND) Payroll	(518.72)	5,152.11	5,152.11	5,596.48
Intercompany Expense (ITC) Payroll	52,914.27	38,169.54	38,169.54	41,461.66
Constructions & Retirement (CAR) Payroll	216,774.47	228,192.19	228,192.18	247,873.75
Total	**1,008,947.31**	**1,149,069.99**	**1,149,069.93**	**1,248,177.21**

RR - 26 d Response – Temporary payroll amounts are not presented as temporary employee counts are minor.

RR - 26 e Response – Other payroll amounts are not applicable.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-27:

Please provide a copy of all incentive compensation and/or bonus plans and provide the level of related payments included in cost of service.

Response

Please see attached documents.
For the Company's Annual Cash Bonus Program, please refer to CONFIDENTIAL National Fuel Exhibit VLH-1. The Company is providing this in a separately sealed envelope that is marked "CONFIDENTIAL". The Company hereby requests that the content of such envelope be placed in the Commission's NON-PUBLIC FOLDERS, and that any employee of the Commission that may have access to such material be directed to maintain its confidentiality. National Fuel will provide copies of such CONFIDENTIAL materials to parties that execute an appropriate Stipulated Protective Agreement or pursuant to a Protective Order issued in this proceeding.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-28:

Please provide the percentage wage rate increases granted by the Company by date and employee category for the three most recent calendar years and the current year to date.

Response:

See attached SDR-RR-28 (pages 1, 2, and 3), which shows the Important Changes pages from the last three Company filings with the PaPUC. During the HTY, the following wage rate increases were noted:

- On December 29, 2024, approximately 109 Pennsylvania Division non-union hourly employees received an average 3.94% wage increase.

- On January 1, 2025, approximately 119 Pennsylvania Division salaried employees received an average 4.22% wage increase.

- On April 13, 2025, approximately 106 union employees in 2154P and 2154PS received an average 2.50% wage increase per the union contract.

- On May 5, 2025, approximately 94 union employees in N.C.F.O/S.E.I.U Chapter 22S received an average 2.00% wage increase per the union contract.

IMPORTANT CHANGES DURING YEAR

Hereunder give particulars concerning the matters indicated below. Make the statements explicit and precise, and number them in accordance with the inquiries. Each inquiry must be answered. However, if the word "None" states the fact, it may be used in answering any inquiry.

1. Changes in, and additions to franchise rights; describing (a) the actual consideration given therefor, and (b) from whom acquired. If acquired without the payment of any consideration, state that fact.
2. Acquisition of other companies, reorganization, merger or consolidation with other companies: give names of companies involved, particulars concerning the transactions, and references to Commission authorization, if any.
3. Purchase or sale of substantial operating units, such as generating stations, transmission lines or distribution lines, specifying items, parties, effective dates and also reference to Commission authorization, if any.
4. Important leaseholds (other than leaseholds for natural gas lands) acquired, given, assigned, or surrendered, giving effective dates, lengths of terms, names of parties, rents, Commission authorization, if any, and other conditions.
5. Important extensions of system, giving location, new territory covered by distribution systems, and dates of beginning operations. Give, also, the number of new customers of each class, and for each class of customers the estimated annual revenues.
6. Estimated increase or decrease in annual revenues due to important rate changes, and the approximate extent to which such increase or decrease is reflected in revenues for the reporting year.
7. Important wage scale changes, showing dates of changes, effect on operating expenses for the year, and estimated annual effect of such wage scale changes on operating expenses.
8. Obligations incurred or assumed by respondent as guantantor for the performance by another of any agreement for the performance by another of any agreement or obligation, excluding ordinary commercial paper maturing on demand or not later than one year after date of issue, and giving Commission authorization, if any.
9. Changes in articles of incorporation or amendments to charter: explain the nature and purpose of such changes or amendments.
10. Other important changes not elsewhere provided for.

Inquiries 1 - 6: None

7 On December 31, 2023 approximately 107 Pennsylvania Division non-union hourly employees received an average 3.93% wage increase.

On January 1, 2024 approximately 113 Pennsylvania Division supervisory employees received an average 6.29% wage increase.

On April 14, 2024 approximately 105 union employees in 2154P and 2154PS received an average 2.50% wage increase per the union contract.

On April 28, 2024 approximately 94 union employees in N.C.F.O/S.E.I.U Chapter 22S received an average 2.00% wage increase per the union contract.

On November 15, 2024 approximately 118 Pennsylvania Division supervisory employees received an average 6.90% annual bonus payment.

On December 29, 2024 approximately 109 Pennsylvania Division non-union hourly employees received an average 3.94% wage increase.

Inquiries 8 - 10: None

IMPORTANT CHANGES DURING YEAR

Hereunder give particulars concerning the matters indicated below. Make the statements explicit and precise, and number them in accordance with the inquiries. Each inquiry must be answered. However, if the word "None" states the fact, it may be used in answering any inquiry.

1. Changes in, and additions to franchise rights; describing (a) the actual consideration given therefor, and (b) from whom acquired. If acquired without the payment of any consideration, state that fact.
2. Acquisition of other companies, reorganization, merger or consolidation with other companies: give names of companies involved, particulars concerning the transactions, and references to Commission authorization, if any.
3. Purchase or sale of substantial operating units, such as generating stations, transmission lines or distribution lines, specifying items, parties, effective dates and also reference to Commission authorization, if any.
4. Important leaseholds (other than leaseholds for natural gas lands) acquired, given, assigned, or surrendered, giving effective dates, lengths of terms, names of parties, rents, Commission authorization, if any, and other conditions.
5. Important extensions of system, giving location, new territory covered by distribution systems, and dates of beginning operations. Give, also, the number of new customers of each class, and for each class of customers the estimated annual revenues.
6. Estimated increase or decrease in annual revenues due to important rate changes, and the approximate extent to which such increase or decrease is reflected in revenues for the reporting year.
7. Important wage scale changes, showing dates of changes, effect on operating expenses for the year, and estimated annual effect of such wage scale changes on operating expenses.
8. Obligations incurred or assumed by respondent as guantantor for the performance by another of any agreement for the performance by another of any agreement or obligation, excluding ordinary commercial paper maturing on demand or not later than one year after date of issue, and giving Commission authorization, if any.
9. Changes in articles of incorporation or amendments to charter: explain the nature and purpose of such changes or amendments.
10. Other important changes not elsewhere provided for.

Inquiries 1 - 5: None

6 On August 1, 2023, Pennsylvania Distribution implemented a base rate increase designed to increase base delivery revenues by $23 million annually in compliance with the June 15, 2023 Commission Order in Docket No. R-2022-3035730, Pennsylvania Distribution's Base Rate Case. For the period of August 1, 2023 through December 31, 2023, the increase in base delivery revenues was approximately $6 million.

7 On January 1, 2023 approximately 102 Pennsylvania Division non-union hourly employees received an average 3.78% wage increase.

On January 1, 2023 approximately 105 Pennsylvania Division supervisory employees received an average 4.54% wage increase.

On April 30, 2023 approximately 90 union employees in N.C.F.O/S.E.I.U Chapter 22S received an average 2.00% wage increase per the union contract.

On November 15, 2023 approximately 109 Pennsylvania Division supervisory employees received an average 7.48% annual bonus payment.

Inquiries 8 - 10: None

IMPORTANT CHANGES DURING YEAR

Hereunder give particulars concerning the matters indicated below. Make the statements explicit and precise, and number them in accordance with the inquiries. Each inquiry must be answered. However, if the word "None" states the fact, it may be used in answering any inquiry.

1. Changes in, and additions to franchise rights; describing (a) the actual consideration given therefor, and (b) from whom acquired. If acquired without the payment of any consideration, state that fact.
2. Acquisition of other companies, reorganization, merger or consolidation with other companies: give names of companies involved, particulars concerning the transactions, and references to Commission authorization, if any.
3. Purchase or sale of substantial operating units, such as generating stations, transmission lines or distribution lines, specifying items, parties, effective dates and also reference to Commission authorization, if any.
4. Important leaseholds (other than leaseholds for natural gas lands) acquired, given, assigned, or surrendered, giving effective dates, lengths of terms, names of parties, rents, Commission authorization, if any, and other conditions.
5. Important extensions of system, giving location, new territory covered by distribution systems, and dates of beginning operations. Give, also, the number of new customers of each class, and for each class of customers the estimated annual revenues.
6. Estimated increase or decrease in annual revenues due to important rate changes, and the approximate extent to which such increase or decrease is reflected in revenues for the reporting year.
7. Important wage scale changes, showing dates of changes, effect on operating expenses for the year, and estimated annual effect of such wage scale changes on operating expenses.
8. Obligations incurred or assumed by respondent as guantantor for the performance by another of any agreement for the performance by another of any agreement or obligation, excluding ordinary commercial paper maturing on demand or not later than one year after date of issue, and giving Commission authorization, if any.
9. Changes in articles of incorporation or amendments to charter: explain the nature and purpose of such changes or amendments.
10. Other important changes not elsewhere provided for.

Inquiries 1 - 6: None

7 On January 1, 2022 approximately 107 Pennsylvania Division supervisory employees received an average 3.43% wage increase.

On January 2, 2022 approximately 99 Pennsylvania Division non-union hourly employees received an average 2.89% wage increase.

On April 1, 2022 approximately 70 Pennsylvania Division supervisory employees received an average 11.28% market adjustment.

On April 10, 2022, approximately 5 union employees in Local 2154P I.B.E.W. received an average 4.00% wage increase and approximately 96 union employees in Local 2154PS I.B.E.W. received an average 18.69% wage increase.

On May 1, 2022, approximately 3 union employees in N.C.F.O/S.E.I.U Chapter 22 received an average 2.00% wage increase and approximately 90 union employees in N.C.F.O/S.E.I.U Chapter 22S received an average 20.08% wage increase.

On May 15, 2022 approximately 102 Pennsylvania Division non-hourly employees received an average 6.88% wage increase.

On May 15, 2022, approximately 82 union employees in N.C.F.O/S.E.I.U Chapter 22S received an average 5.59% wage increase per union negotiations.

On October 16, 2022, approximately 5 union employees in Local 2154P I.B.E.W. received an average 3.00% wage increase and approximately 98 union employees in Local 2154PS I.B.E.W. received an average 3.00% wage increase.

On October 31, 2022 approximately 107 Pennsylvania Division supervisory employees received an average 7.43% bonus payment.

Inquiries 8 - 10: None

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-29:

Please provide an analysis (description, dates and amounts) of any gains or losses on utility property sold for the lesser of the last three years or since the Company's last rate case or anticipated during the FTY. Explain how such amounts have been treated for ratemaking purposes.

Response:

The Company has not sold any major property in the last 3 years.

The normal process for handling gains or losses on the sale of utility property is to credit Gas Plant in Service (Account 101) and debit the Reserve (Account 108) plus the cost of the removal, salvage value, and any proceeds. The gain or loss is then included in the annual depreciation calculation.

Over the past three years, proceeds on the sale of vehicles averaged $320,000 each year. For ratemaking purposes, these proceeds are treated as net salvage.

National Fuel Gas Distribution Corporation PA Division

Standard Data Request

Revenue Requirement

Question No. RR-30:

Please provide the level of each of the following which is included in the Company2 s cost of service by separate type and/or payee, which are incurred directly by the Company or are allocated or billed to the Company by affiliates or its parent company.

a. Fines and penalties;
b. Contributions and donations;
c. Membership dues;
d. Lobbying expense;
e. Employee activity costs (e. g. , picnics, parties, awards);
f. Investor relations expenses

Response:

a. No amounts for fines and penalties are included in the Company2 s cost of service

b. No amounts for contributions and donations are included in the Company2 s cost of service.

c. National Fuel Gas Distribution Corporation
Pennsylvania Division
Summary of Membership Dues
For the Twelve Months Ended September 30, 20 25

America Gas Associated	$ 147,795.25
Energy Association of Pennsylvania	58,514.28
Erie Downtown Development Corporation	12,500.00
Coalition for Renewable	6,000.00
Out Nations Energy Future	3,700.00
Penn-Northwest Development Corp	2,812.50
Edison Electric Institute	1,842.14
Common Ground Alliance	1,250.00
Erie Club	1,185.00
Institute of Internal Auditors	792.21
IOAG of New York	693.00
Manufacturer & Business Association	692.50
Erie County Bar Association	570.00
Pittsburgh Region Clean Cities	500.00
Clarion County Economic Development	500.00
Shenango Valley Chamber of Commerce	500.00
Other	5,630.11
Total Membership Dues cost	$ 245,476.99

d. No amounts for lobbying expense are included in the Company"s cost of service

e.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Summary of Employee Activity Costs
For the Twelve Months Ended September 30, 2025

Service Awards:	
Ambassador Banquet & Conference Center	$ 5,112.19
Target Corporation	7,925
	13,037
Wellness Programs:	
Tops Markets LLC	933
Total Employee Activity Costs	$ 13,970.19

f.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Summary of Investor Relations Expense
For the Twelve Months Ended September 30, 2025

Investor Relations costs are allocated to the Pennsylvania Division of National Fuel Gas Distribution Corporation.

Consulting	$ 7,912.36
Meeting Expenses	4,145.46
Printing and Postage	44.09
Conference Calls and Webcasts	1,451.06
Website Maintenance	1,451.06
Registration, Training, and News	77.17
Total Investor Relations Expenses	$ 15,081.20

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-31:

Please provide a description and the purpose for membership for each organization listed in the previous response.

Response:

Industry Organizations:

Through membership in various industry organizations, National Fuel Gas is part of a network of indsutry professionals whose purpose is to share information regarding all aspects of the industry, provide educational services, provide joint research and development opportunities, and develop strategies to encourage growth of the industry as a whole.

American Gas Association National industry association with the purpose stated above.	$ 147,795.25
Energy Association of Pennsylvania State industry association with the purpose stated above.	58,514.28
Coalition for Renewable Natural Gas Provides public policy advocacy and education for the renewable gas industry in North America.	6,000.00
Our Nations Energy Future National industry association with the purpose stated above.	3,700.00
Edison Electric Institute National industry association with the purpose stated above.	1,842.14
Independent Oil & Gas Association of New York Member-driven association that monitors issues concerning the oil and natural gas industry.	693.00

Civic and Community Organizations:

As a member of the communities in which we provide service, National Fuel participates in various Civic and Community organizations to help with the economic development of those communities.

Erie Downtown Development Corporation Non-profit organization focused on revitalizing downtown Erie, Pennsylvania, through development projects.	12,500.00
Pennsylvania Northwest Development Corp. Organization providing economic development function in cooperation with existing development groups and local governments throughout Mercer County, Pennsylvania.	2,812.50
Common Ground Alliance Dedicated to preventing damage to underground utility infrastructure and protecting those who live and work near these assets through the shared responsibility of its stakeholders.	1,250.00
Erie Club Social club located in Erie, PA.	1,185.00
Pittsburgh Region Clean Cities Advances the energy, economic, and environmental security of the United States by supporting local actions to reduce petroleum use in transportation.	500.00
Clarion County Economic Development Assists existing and prospective wealth generating companies to create and keep family sustaining jobs in Clarion County.	500.00
Shenango Valley Chamber of Commerce Organization that provides valuable benefits and services to members and leads economic development efforts in the Shenango Valley.	500.00

Trade, Technical, and Professional Organizations

National Fuel Gas participates in trade, technical, or professional organizations through company memberships or by supporting employees who belong to these organizations.

Institute of Internal Auditors Advocates, provides educational conferences, and develops standards, guidance, and certifications for the internal audit profession.	792.21
Manufacturer & Business Association Assists members by providing information and services towards pursuing business and community interests.	692.50
Erie County Bar Association Professional legal organization.	570.00

National Fuel Gas Distribution Corporation PA Division

Standard Data Request

Revenue Requirement

Question No. RR-32:

Please provide the level of payments made to industry organizations included in cost of service along with a description of each payee organization or project.

Response:

The following payment, exclusive of membership dues, was made to an industry organization and is included in the cost of service.

American Gas Association – Gas Distribution Engineering Committee Dinner $125.00

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-33:

a. Please provide the following information related to the Company's membership in AGA:
b. Cost included in requested cost of service.
c. Cost excluded from requested cost of service.
d. Copy of the most recent audit report of AGA expenditures prepared by NARUC.
e. Most recent correspondence received from AGA which addresses the percentage of dues related to lobbying or other separate activities.
f. Policy statement, objective, purpose, etc. of AGA.

Response:

b. $142,029 is included in the Company's requested cost of service.

c. $5,766 is excluded from the Company's requested cost of service.

d. Refer to Attachment A - RR-33. Please note that the NARUC no longer request the AGA to perform an audit annually, therefore no audit report is available.

e. Refer to Attachment B - RR-33, section marked "Important IRS Required Notice" regarding portions of dues allocable to lobbying.

f. Refer to Attachment C - RR-33.

AMERICAN GAS ASSOCIATION
2024-2025 BUDGETS

All Programs	$ 2024 Allocation	% 2024 Allocation	$ 2025 Allocation	% 2025 Allocation
Advocacy & Outreach	$ 1,339,000	3%	$ 1,410,000	3%
Communications	3,122,000	7%	3,101,000	7%
Energy Markets, Analysis, and Standards	4,347,000	10%	4,826,000	10%
General and Administrative	9,922,000	23%	10,834,000	23%
General Counsel and Regulatory Affairs	4,209,000	10%	4,012,000	8%
Government Affairs & Public Policy	5,514,000	13%	5,730,000	12%
Industry Finance & Administrative Programs	1,812,000	4%	1,809,000	4%
Membership and Strategic Development	4,983,000	12%	5,014,000	10%
Safety, Operations, Engineering & Security	7,936,000	18%	11,206,000	23%
Expense Budget	43,184,000	100%	47,942,000	100%

Note
AGA estimates that lobbying related expenses, as defined under IRC Section 162, will account for 4.3% of member dues in 2024 and 3.78% of member dues in 2025.

American Gas Association

Post Office Box 79226
Baltimore, Maryland 21279-0226
Telephone (202) 824-7256
Fax (202) 824-7256
Email to: dues@aga.org

2025 MEMBERSHIP DUES NOTICE

National Fuel Gas Distribution Corporation

2025 DUES

Year ending December 31, 2025

AGA dues rules are attached. Dues are based upon the average of the following operating income ($000):

2021 88,418 ✓ 2022 80,851 ✓ 2023 81,544 ✓ Average 83,604

YOUR 2024 DUES WERE ..... $ 381,460

YOUR 2025 DUES ARE ..... $ 388,191

2025 Payment Schedule (Please check box)

☐ Full amount ☐Semi-annually (Jan.1, July 1) ☒Quarterly (Jan.1, Apr.1, July 1, Oct.1) ☐Other

Please email this completed membership dues notice to Joe Pierce at dues@aga.org. An official AGA invoice will follow based on the payment schedule selected. Payments may be paid electronically using the instructions below or via check mailed to the P.O Box above.

Invoice to: David P. Bauer, President & CEO
National Fuel Gas Company
6363 Main Street
Williamsville, NY 14221
Phone: (716) 857-7318
Email: BauerD@natfuel.com & CharlesM@natfuel.com
(Michelle Charles, Private Secretary)

Approved: David P. Bauer
Title: President & CEO
Date: November 21, 2024

Send payments electronically by ACH to:
Account Name: American Gas Association
Bank: Truist Bank
Address: 214 N. Tryon Street, Charlotte NC 28202
ABA Number: 021052053
Account Number: 11521323
Reference: **142753**

IMPORTANT IRS REQUIRED NOTICE

Dues payments, contributions or gifts to the American Gas Association are not tax deductible as charitable contributions for federal income tax purposes. However, they may be deductible as ordinary and necessary business expenses subject to restrictions imposed as a result of AGA's lobbying activities as defined by the Budget Reconciliation Act of 1993. AGA estimates that the nondeductible portion of your 2025 dues -- **the portion that is allocable to lobbying is 3.78%.**

AMERICAN GAS ASSOCIATION
2025 DUES RULES

U.S. Energy Utilities

1. AGA Dues for U.S. Energy Utility members are based on the average of 2021, 2022 and 2023 gas operating income* and the following income blocks and rates:

Block 1	First	$ 10,000,000	1.0468%
Block 2	Next	$ 7,500,000	.6710%
Block 3	Next	$ 20,000,000	.4481%
Block 4	Next	$ 40,000,000	.3200%
Block 5	Next	$ 80,000,000	.2550%
Block 6	Over	$ 157,500,000	.1500%

   In applying the above formula, the maximum annual increase for any company equals 7.09%, and the maximum decrease equals 0%.

2. For companies that merge or are acquired whose dues would have decreased, the dues of the resulting company will equal the combined dues of the merging companies immediately prior to the merger for 4 years with no dues increases for increased operating income. After 4 years, the company's dues will be assessed via the formula structure, and any reduction in dues will be phased-in over a 4-year period or until the phased-in amount equals the formula dues, whichever comes first.

3. If necessary, the Board may approve the redistribution of any remaining AGA budget deficit to the members based on each company's share of total dues revenue.

4. For distribution companies with less than 75,000 meters, the maximum distribution company dues are equal to $0.90/meter**. When dues are capped at $0.90/meter, the maximum annual increase/decrease provision does not apply.

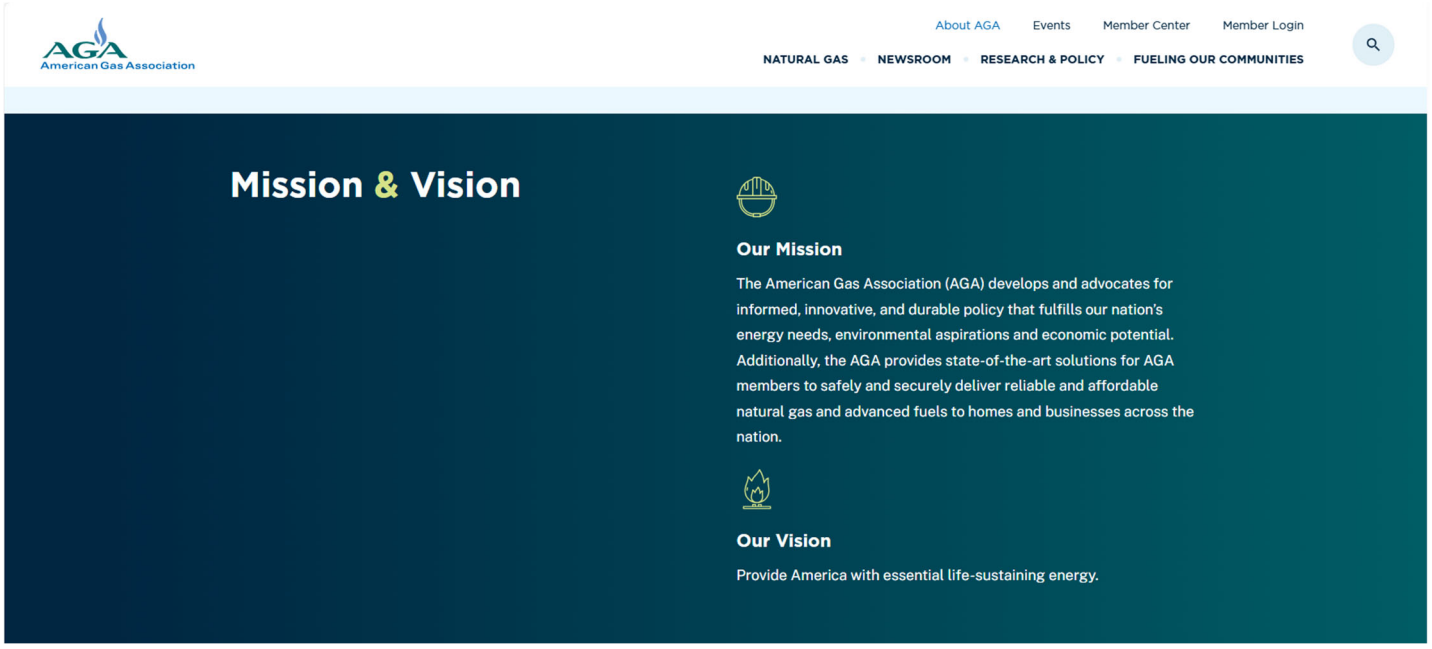
5. No company, whose consolidated or subsidiary meets the eligibility standards of a U.S. Energy Utility company, will be allowed to join a different AGA membership class. All regulated U.S. gas distribution subsidiaries of a parent organization must be included in the dues calculations.

6. Minimum Gas Company 2025 dues are $2,538.

*Gas operating income is defined as Line 11, Schedule II of the Uniform Statistical Report.

**Meters are defined as Line 17 (total), Schedule XX of the Uniform Statistical Report.

Please contact Terri Oliva, Chief Financial Officer at (202) 824-7092 regarding any questions about the invoice or rules.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Member Center
Member Login
NATURAL GAS
NEWSROOM
RESEARCH & POLICY
FUELING OUR COMMUNITIES
Mission & Vision
Our Mission
The American Gas Association (AGA) develops and advocates for informed, innovative, and durable policy that fulfills our nation's energy needs, environmental aspirations and economic potential. Additionally, the AGA provides state-of-the-art solutions for AGA members to safely and securely deliver reliable and affordable natural gas and advanced fuels to homes and businesses across the nation.
Our Vision
Provide America with essential life-sustaining energy.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-34:

Please provide a copy of the most recent FERC audit findings, the Company's response and final disposition of audit exceptions.

Response:

There are no standard FERC audit procedures for Local Distribution Companies.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-35:

Please provide the annual level of forfeited discounts or late payment charges for the preceding three calendar years. Identify the level of sales revenue with which these are associated.

Response:

GL Account	2022	2023	2024
487000 – Customer Forfeited Discounts	$ 1,258,895	$ 1,288,672	$ 1,072,991
Gas and Transportation Revenues	$ 276,687,669	$ 241,712,351	$ 208,512,850

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-36:

If not reflected in the lead-lag study, please provide a listing of the various types of employee withholdings, garnishments and other employee funds held by the Company for remittance at a later date.

Response:

Union Dues
Medical, Dental, and Vision
Political Action Committee
Deferred Earnings -401K
Flexible Spending Account – Medical, Dependent Care
Employee Spending account- Parking
Contributory Insurance
Dependent Insurance
Long Term Disability Insurance
Charitable Giving
Garnishments
401K Loan Payments
Other occasional wages attachments (Federal, State, Local tax liens)

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-37:

Please provide all detailed workpapers supporting the adjustments to rate base and operating income.

Response:

Please refer to National Fuel's Exhibit A (Historic), Exhibit A (Future), and Exhibit A (Fully Projected), schedules A, C and D.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-38:

Please provide a copy of the Company's most recent SFAS 106 plan actuarial study.

Response:
Please see attached. Also note, these studies are conducted at the National Fuel Gas Parent level.

Mercer

welcome to brighter

ASC 715 (US GAAP) Actuarial Valuation Report as of September 30, 2025

National Fuel Gas Company Postretirement Benefits

National Fuel Gas Company
November 4, 2025

Contents

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4. Basis of valuation 32

Appendix A: NPPBC for fiscal year ending September 30, 2025 by division and employment status

Appendix B: Reconciliation of funded status as of September 30, 2025 by division and employment status

Section 1
Highlights

This report presents the results under US accounting standards for the National Fuel Gas Company postretirement medical and life insurance plans for management's use in the preparation of the Company's financial statements for the accounting period October 1, 2024 through September 30, 2025.

Section 2 presents the basic valuation results and disclosures, including the components of the net periodic postretirement benefit cost (NPPBC) and a reconciliation of the financial information. **Section 3** presents information regarding plan assets. **Section 4** describes the actuarial basis on which the results of an application of the standards are founded.

The other comprehensive income/(loss) items for the fiscal year ending September 30, 2025 due to plan changes and net gain/(loss) arising during the year were $0 and $(19,722,202), respectively. The sources of the net loss are described in Section 2.4.

For the fiscal year ending September 30, 2025, reclassification adjustments of other comprehensive income/(loss) recognized as components of NPPBC consist of $(428,689) of prior service cost/(credit) and $37,012 of net loss/(gain).

The total other comprehensive income/(loss) for the fiscal year ending September 30, 2025 is $(20,113,879).

This valuation reflects the impact of the Medicare Prescription Drug, Improvement, and Modernization Act of 2003.

Summary of principal plan results

	Fiscal year ending	
	September 30, 2025	September 30, 2024
Service cost with interest to end of year	$ 518,981	$ 434,446
Net periodic postretirement benefit cost/(income)	(11,515,835)	(13,341,794)
Estimated pay-as-you-go cost	24,040,094	23,547,335

	Fiscal year ending	
	September 30, 2025	September 30, 2024
Accumulated postretirement benefit obligation (APBO)		
Inactives	$ 283,976,937	$ 272,096,832
Actives fully eligible	34,719,004	34,995,147
Actives not yet fully eligible	11,887,766	13,932,887
Total	$ 330,583,707	$ 321,024,866
Fair value of assets	496,105,580	496,064,799
Unfunded APBO	$ (165,521,873)	$ (175,039,933)

	Fiscal year ending	
	September 30, 2025	September 30, 2024
Number of participants in the medical valuation		
Inactives	1,904	1,960
Actives	180	212
Total	2,084	2,172

Important notices

Mercer has prepared this report exclusively for National Fuel Gas Company. Subject to this limitation, National Fuel Gas Company may direct that this report be provided to its auditors in connection with an audit of its financial statements. Mercer is not responsible for use of this report by any other party.

The only purpose of this report is to present Mercer's actuarial estimates of liabilities as of September 30, 2025 for the National Fuel Gas Company postretirement medical and life insurance benefits for National Fuel Gas Company to incorporate, as it deems appropriate, in its financial statements under US accounting standards.

This report may not be used for any other purpose. Mercer is not responsible for the consequences of any unauthorized use. Its contents may not be modified, incorporated into or used in other material, sold or otherwise provided, in whole or in part, to any other person or entity without Mercer's permission.

This report was prepared in accordance with generally accepted actuarial principles and procedures. The results reported herein are based on the assumptions and methods described in Section 4 of this report. The actuarial assumptions were selected by National Fuel Gas Company. Based on the information provided to us, we believe that the actuarial assumptions are reasonable for the purposes described in this report.

All parts of this report, including any documents incorporated by reference, are integral to understanding and explaining its contents. No part may be taken out of context, used, or relied upon without reference to the report as a whole.

Decisions about benefit changes, granting new benefits, investment policy, funding policy, benefit security, and/or benefit-related issues should not be made solely on the basis of this valuation, but only after careful consideration of alternative economic, financial, demographic, and societal factors, including financial scenarios that assume future sustained investment losses.

National Fuel Gas Company is ultimately responsible for selecting the plan's accounting policies, methods, and assumptions. The policies, methods, and assumptions used for the valuation are described in Section 4 of this report. National Fuel Gas Company is solely responsible for communicating to Mercer any changes required to the policies, methods, or assumptions.

National Fuel Gas Company is solely responsible for selecting the plan's investment policies, asset allocations, and individual investments. The Mercer consultants who prepared this report have not provided any investment advice to National Fuel Gas Company.

This report is based on our understanding of applicable law and regulations as of the valuation date. Mercer is not an accountant or auditor and is not responsible for the interpretation of, or compliance with, accounting standards. Citations to and descriptions of accounting standards provided in this report are for reference purposes only. Mercer is not a law firm and this analysis is not intended to be a legal opinion. National Fuel Gas Company should consider securing the advice of legal counsel with respect to any legal matters related to this document and any attachments.

To prepare this report, we have used Mercer's suite of proprietary valuation software and tools. The purpose of a valuation is to measure the plan's liabilities, reflecting the applicable census data and provisions and using the methods and assumptions selected by National Fuel Gas Company based on

the applicable laws, regulations, and other guidance in effect as of the measurement date. We have relied on the experts who developed each of the following:

- Mercer's portfolio return calculator
- Mercer's capital market assumptions
- Mercer's yield curve models
- Mercer's retiree medical trend model
- Mercer's retiree aging model

The first three tools were used in setting the discount rate and in evaluating the reasonableness of the economic assumptions, such as the expected rate of return on plan assets. The final two tools were used in developing the trend table and in developing the aging table.

Actuarial Standard of Practice No. 56 requires the actuary to identify and disclose any material inconsistencies among actuarial assumptions, and, for assumptions that are not prescribed by applicable law, the reason for such inconsistencies. To our knowledge, there are no material inconsistencies in assumptions.

National Fuel Gas Company should notify Mercer promptly after receipt of this report if it disagrees with anything contained herein or is aware of any information that would affect the results of the valuation that has not been communicated to Mercer or incorporated herein. This report will be deemed final and acceptable to National Fuel Gas Company unless such notice is promptly provided to Mercer.

Professional qualifications

We are available to answer any questions on the material contained in this report or to provide explanations or further detail as may be appropriate. Collectively, the undersigned credentialed actuaries meet the Qualification Standards of the American Academy of Actuaries to render the actuarial opinion contained in this report. We are not aware of any direct or material indirect financial interest or relationship, including investment consulting or other services provided to National Fuel Gas Company by the actuaries signing this report that could create a conflict or impair the objectivity of this work. To the extent that other Mercer professionals have provided investment services to National Fuel Gas Company, we do not believe those services would result in a conflict of interest nor affect the objectivity of this work.

November 4, 2025

Emily Taddeo, Principal, FSA, EA

Mercer (US) LLC
70 Linden Oaks, Suite 310
Rochester, New York 14625
585 389 8700

Date

November 4, 2025

Roshni Shah, Principal, ASA, MAAA

Mercer (US) LLC
1717 Main Street
Dallas, Texas 75201
214 695 8031

Date

Section 2
Accounting information

US accounting standards require that certain information about postretirement benefits other than pension benefits be disclosed in the footnotes to the sponsor's financial statements. The disclosures include a statement of the net periodic postretirement benefit cost, a reconciliation of the plan's funded status, a statement of assumptions and methods, and benefit payments expected to be paid in the next ten years. Presented in this section are illustrations of this information.

Section 2.1 Disclosure of net periodic postretirement benefit cost for fiscal year ending September 30, 2025

Section 2.2 Reconciliation of funded status

Section 2.3 Disclosure of sensitivity to changes in health care cost trend rates for fiscal year ending September 30, 2025

Section 2.4 Supporting documentation

A. Reconciliation of cumulative employer contributions in excess of net periodic postretirement benefit cost during fiscal year ending September 30, 2025
B. Determination of net (gain)/loss for fiscal year ending September 30, 2025
C. Effect of assumption changes for fiscal year ending September 30, 2025
D. Amortization of (gains)/losses applicable to entities other than NY Distribution Corporation for the period October 1, 2024 to September 30, 2025
E. Amortization of vintage (gains)/losses applicable to NY Distribution Corporation for the period October 1, 2024 to September 30, 2025
F. Amortization of prior service (credit)/cost for fiscal year ending September 30, 2025
G. Other changes recognized in other comprehensive income

Section 2.5 Employer disclosure information

Section 2.1: Net periodic postretirement benefit cost for fiscal year ending September 30, 2025

		Fiscal year ending September 30, 2025
1.	**Service cost**	$ 518,981
2.	**Interest cost**	$ 14,501,221
3.	**Actual return on assets**	
	a. Expected return	$ 26,144,360
	b. Asset (gain)/loss	2,650,462
	c. Actual return (a. – b.)	$ 23,493,898
4.	**Other NPPBC components**	
	a. Amortization of prior service (credit)/cost	$ (428,689)
	b. Amortization of (gain)/loss	37,012
	c. Deferral of asset (gain)/loss	2,650,462
	d. Total (a. + b. - c.)	$ (3,042,139)
5.	**Net periodic postretirement benefit cost** (1. + 2. – 3.c. + 4.d.)	**$ (11,515,835)**

Section 2.2: Reconciliation of funded status

		Fiscal year ending	
		September 30, 2025	September 30, 2024
1.	Accumulated postretirement benefit obligation	$ 330,583,707	$ 321,024,866
2.	Fair value of assets	496,105,580	496,064,799
3.	Funded status (2. – 1.)	$ 165,521,873	$ 175,039,933
4.	Net amount recognized	$ 165,521,873	$ 175,039,933
Amounts not yet reflected in net periodic postretirement benefit cost and included in accumulated other comprehensive income			
5.	Prior service credit/(cost)	$ 257,210	$ 685,899
6.	Accumulated gain/(loss)	(19,813,186)	(127,996)
7.	Accumulated other comprehensive income/(loss) (5. + 6.)	$ (19,555,976)	$ 557,903
8.	Cumulative employer contributions in excess of net periodic postretirement benefit cost	$ 185,077,849	$ 174,482,030
9.	**Net amount recognized in statement of financial position** (7. + 8.)	**$ 165,521,873**	**$ 175,039,933**

Section 2.3: Supporting documentation

Sensitivity to changes in health care cost trend rates for fiscal year ending September 30, 2025

	Valuation trend	Valuation trend +1%	Difference	% change
The aggregate of the service cost and interest cost	$ 15,020,202	$ 16,800,767	$ 1,780,565	11.85%
Accumulated postretirement benefit obligation as of September 30, 2025	$ 330,583,707	$ 362,507,371	$ 31,923,664	9.66%

	Valuation trend	Valuation trend -1%	Difference	% change
The aggregate of the service cost and interest cost	$ 15,020,202	$ 13,582,616	$ (1,437,586)	(9.57)%
Accumulated postretirement benefit obligation as of September 30, 2025	$ 330,583,707	$ 302,979,911	$ (27,603,796)	(8.35)%

Trend rate assumptions

Health care cost trend rates on eligible charges as of September 30, 2025	Medical		Prescription drug	Medicare Part B premium	Retiree drug subsidy
	Pre 65	Post 65			
Initial trend (2025)	7.25%	5.75%	11.75%	5.75%	4.00%
Ultimate trend	4.00%	4.00%	4.00%	4.00%	4.00%
Number of years to ultimate trend	25	25	25	25	25

Section 2.4: Supporting documentation

A. Reconciliation of cumulative employer contributions in excess of net periodic postretirement benefit cost

			Fiscal year ending September 30, 2025
1.	Cumulative employer contributions in excess of net periodic postretirement benefit cost at September 30, 2024	$	174,482,030
2.	Employer contributions during fiscal 2025		593,848
3.	Net periodic postretirement benefit (cost)/income for fiscal 2025		11,515,835
4.	Subsidy payment received		(1,513,864)
5.	**Cumulative employer contributions in excess of net periodic postretirement benefit cost at September 30, 2025** (1. + 2. + 3. + 4.)	**$**	**185,077,849**

The net contributions shown in item 2 above include funding contributions and benefit payments made by National Fuel Gas Company on a pay-as-you-go basis as follows:		
Contributions to trust	$	0
Benefits paid by employer on a pay-as-you-go basis		593,848
Total	$	593,848

B. Determination of net (gain)/loss for fiscal year ending September 30, 2025

Components of net (gain)/loss for fiscal year ending September 30, 2025		
1. Change in demographics/claims experience		
a. Projected APBO as of September 30, 2025	$	312,004,974
b. APBO as of September 30, 2025 before change in assumptions		322,507,932
c. (Gain)/loss from change in demographics/claims[1] (b. – a.)	$	10,502,958
2. Change in assumptions		
a. APBO as of September 30, 2025 before change in assumptions	$	322,507,932
b. APBO as of September 30, 2025 after change in assumptions		330,583,707
c. (Gain)/loss due to assumption changes (b. – a.)	$	8,075,775
3. Net benefit payments		
a. Expected net benefit payments for fiscal year ending September 30, 2025	$	24,040,094
b. Actual net benefit payments for fiscal year ending September 30, 2025		22,533,101
c. (Gain)/loss from benefit payments (b. – a.)	$	(1,506,993)
4. Investment results		
a. Expected return on assets for fiscal year ending September 30, 2025	$	26,144,360
b. Actual return on assets for fiscal year ending September 30, 2025		23,493,898
c. (Gain)/loss from investment results (a. – b.)	$	2,650,462

Summary of net (gain)/loss arising during 2025		
1. Change in demographics/claims experience	$	10,502,958
2. Change in assumptions		8,075,775
3. Net benefit payments		(1,506,993)
4. Investment results		2,650,462
Net (gain)/loss arising during 2025 (1. + 2. + 3. + 4.)	**$**	**19,722,202**

(Gain)/loss balance as of September 30, 2025		
1. (Gain)/loss balance as of September 30, 2024	$	127,996
2. Amount amortized during 2025		37,012
3. Net (gain)/loss arising during 2025		19,722,202
(Gain)/loss balance as of September 30, 2025 (1. – 2. + 3.)	**$**	**19,813,186**

[1] Reflects a loss of $4,077,506 due to demographic experience and a loss of $6,425,452 due to claims experience.

C. Effect of assumption changes for fiscal year ending September 30, 2025

The effective discount rate for determining the benefit obligation increased from 4.98% per annum as of September 30, 2024 to 5.30% per annum as of September 30, 2025. This assumption change decreased the APBO by $9,913,263 as of the end of the period. Effective September 30, 2025, the mortality improvement projection scale assumption was updated to reflect the publication of additional mortality data. This assumption change decreased the APBO by $243,484 as of the end of the period. Effective September 30, 2025, the trend assumption was updated to better reflect anticipated experience. This assumption change increased the APBO by $18,232,522 as of the end of the period.

D. Amortization of (gains)/losses applicable to entities other than NY Distribution Corporation for the period October 1, 2024 to September 30, 2025

			Total	PA Distribution	Supply	SRC	Parent	Empire Pipeline	Midstream
1.	**Accumulated postretirement benefit obligation (APBO)**	$	142,264,070	57,874,500	80,878,458	1,712,928	1,614,830	0	183,354
2.	**Fair value of plan assets**	$	215,539,005	106,314,575	109,224,430	0	0	0	0
3.	**Prior service (credit)/cost**	$	(282,708)	(116,204)	(162,298)	(3,702)	(504)	0	0
4.	**Cumulative employer contributions in excess of net periodic postretirement benefit cost**	$	93,313,270	61,532,824	36,237,633	(1,969,886)	(2,041,074)	(7,712)	(438,515)
5.	**Unrecognized (gain)/loss** (1. – 2. – 3. + 4.)	$	20,321,043	13,208,953	8,053,959	(253,256)	(425,740)	(7,712)	(255,161)
6.	**Market-related value of plan assets (MRV)**	$	215,539,005	106,314,575	109,224,430	0	0	0	0
7.	**Excess of fair value over market-related value** (2. – 6.)		0	0	0	0	0	0	0
8.	**Unrecognized (gain)/loss potentially subject to amortization** (5. + 7.)			13,208,953	8,053,959	(253,256)	(425,740)	(7,712)	(255,161)
9.	**Corridor (calculated separately for union and nonunion based on 10% of the larger of APBO or MRV)**			10,631,458	10,922,443	171,293	161,483	0	18,335
10.	**Unrecognized (gain)/loss subject to amortization**[2]			3,435,261	1,317,990	(81,963)	(264,257)	(7,712)	(236,826)
11.	**Average future service of active participants**			4.06	4.06	4.06	4.06	4.06	4.06
12.	**Weighted amortization amount** (10. ÷ 11.)	**$**	**1,025,244**	**846,123**	**324,628**	**(20,188)**	**(65,088)**	**(1,900)**	**(58,331)**

[2] Generally, this is the excess of the absolute value of 8. over 9. However, the unrecognized (gain)/loss subject to amortization is determined separately for collectively and non-collectively bargained employees, which can produce a different result. See Appendix A for additional details.

E. Amortization of vintage (gains)/losses applicable to NY Distribution Corporation for the period October 1, 2024 to September 30, 2025

	Summary for fiscal year 2025		
	Balance at beginning of period	Amount recognized	Balance at end of period
Prior vintage year	$ 1,830,358	1,830,358	$ 0
Vintage year 1	7,738,368	3,869,186	3,869,182
Vintage year 2	(12,999,293)	(4,333,099)	(8,666,194)
Vintage year 3	(3,194,472)	(798,618)	(2,395,854)
Vintage year 4	10,870,194	2,174,039	8,696,155
Vintage year 5	(865,995)	(144,333)	(721,662)
Vintage year 6	(28,132,320)	(4,018,903)	(24,113,417)
Vintage year 7	1,565,223	195,653	1,369,570
Vintage year 8	(5,580,399)	(620,044)	(4,960,355)
Vintage year 9	8,575,289	857,529	7,717,760
Vintage year 10	N/A	N/A	9,614,932
Total	**$ (20,193,047)**	**(988,232)**	**$ (9,589,883)**

The base associated with vintage year 10 was established as of September 30, 2025, the base associated with vintage year 9 was established as of September 30, 2024, etc.

F. Amortization of prior service (credit)/cost for fiscal year ending September 30, 2025

Description	Amortization period			Balances		Payment
	Date created	Initial years	Years left	Initial	Outstanding	
Prior service (credit)/cost						
Plan amendment – 2011	10/1/2011	14.60	0.60	$ (6,258,856)	$ (257,210)	$ (257,210)
Total				**$ (6,258,856)**	**$ (257,210)**	**$ (257,210)**

Prior service (credit)/cost amount		
1. Amount of base	$	(6,258,856)
2. Amortization period		14.60 years
3. Effective date		10/01/2011

Amortization schedule

Year	Beginning balance	Amortization amount	Ending balance
2011	$ 0	$ 0	$ (6,258,856)
2012	(6,258,856)	(428,689)	(5,830,167)
2013	(5,830,167)	(428,689)	(5,401,478)
2014	(5,401,478)	(428,689)	(4,972,789)
2015	(4,972,789)	(428,689)	(4,544,100)
2016	(4,544,100)	(428,689)	(4,115,411)
2017	(4,115,411)	(428,689)	(3,686,722)
2018	(3,686,722)	(428,689)	(3,258,033)
2019	(3,258,033)	(428,689)	(2,829,344)
2020	(2,829,344)	(428,689)	(2,400,655)
2021	(2,400,655)	(428,689)	(1,971,966)
2022	(1,971,966)	(428,689)	(1,543,277)
2023	(1,543,277)	(428,689)	(1,114,588)
2024	(1,114,588)	(428,689)	(685,899)
2025	(685,899)	(428,689)	(257,210)
2026	(257,210)	(257,210)	0

G. Other changes recognized in other comprehensive income

	Fiscal year ending September 30, 2025	Fiscal year ending September 30, 2024
Prior service cost/(credit) arising during period	$ 0	$ 0
Net loss/(gain) arising during period	19,722,202	16,301,573
Amortizations		
Prior service (cost)/credit	428,689	428,689
(Loss)/gain	(37,012)	2,266,499
Total recognized in other comprehensive (income)/loss	**$ 20,113,879**	**$ 18,996,761**
Total recognized in NPPBC and other comprehensive (income)/loss	**$ 8,598,044**	**$ 5,654,967**

Section 2.5: Employer disclosure information

	Fiscal year ending September 30, 2025	Fiscal year ending September 30, 2024
Change in benefit obligation		
Benefit obligation at beginning of period	$ 321,024,866	$ 274,278,704
Service cost	518,981	434,446
Interest cost	14,501,221	15,560,929
Plan participants' contributions	3,597,332	3,401,115
Retiree drug subsidy receipts[3]	1,513,864	1,207,655
Actuarial (gain)/loss	17,071,740	54,441,980
Amendments	0	0
Special termination benefits	0	0
Benefits paid	(27,644,297)	(28,299,963)
Benefit obligation at end of period	**$ 330,583,707**	**$ 321,024,866**
Change in plan assets		
Fair value of plan assets at beginning of period	$ 496,064,799	$ 455,702,334
Actual return on plan assets	23,493,898	64,782,388
Employer contributions	593,848	478,925
Plan participants' contributions	3,597,332	3,401,115
Benefits paid	(27,644,297)	(28,299,963)
Fair value of assets at end of period	**$ 496,105,580**	**$ 496,064,799**
Funded status	**$ 165,521,873**	**$ 175,039,933**
Amounts recognized[4] in the statement of financial position consist of		
Noncurrent assets	$ 169,227,570	$ 178,551,045
Current liabilities	(224,452)	(220,156)
Noncurrent liabilities	(3,481,245)	(3,290,956)
Net amount recognized at year-end	**$ 165,521,873**	**$ 175,039,933**

[3] National Fuel Gas Company recognizes Retiree Drug Subsidy (RDS) receipts as they are received.

[4] Amounts are determined on a company by company basis and then aggregated.

	Fiscal year ending September 30, 2025	Fiscal year ending September 30, 2024
Amounts not yet reflected in net periodic benefit cost and included in accumulated other comprehensive income/(loss)		
Transition asset/(obligation)	$ 0	$ 0
Prior service credit/(cost)	257,210	685,899
Accumulated gain/(loss)	(19,813,186)	(127,996)
Accumulated other comprehensive income/(loss)	**$ (19,555,976)**	**$ 557,903**
Cumulative employer contributions in excess of NPPBC	185,077,849	174,482,030
Net amount recognized in statement of financial position	**$ 165,521,873**	**$ 175,039,933**
Weighted-average assumptions used to determine benefit obligations as of September 30		
Effective discount rate	5.30%	4.98%
Average rate of compensation increase	N/A	N/A
	See Exhibit A	See Exhibit B
Components of net periodic benefit cost		
Service cost	$ 518,981	$ 434,446
Interest cost	14,501,221	15,560,929
Expected return on plan assets	(26,144,360)	(26,641,981)
Amortization of transition (asset)/obligation	0	0
Amortization of prior service (credit)/cost	(428,689)	(428,689)
Amortization of actuarial (gain)/loss	37,012	(2,266,499)
Net periodic benefit cost	**$ (11,515,835)**	**$ (13,341,794)**
Weighted-average assumptions used to determine net periodic postretirement benefit cost		
Effective discount rate for benefit obligation	4.98%	5.99%
Effective rate for interest on benefit obligation	4.69%	5.93%
Effective discount rate for service cost	5.21%	5.99%
Effective rate for interest on service cost	5.14%	6.01%
Expected long-term rate of return on plan assets	5.40%	6.00%
Average rate of compensation increase	N/A	N/A
Health care trend rates	See Exhibit B	See Exhibit C

	Fiscal year ending September 30, 2025	Fiscal year ending September 30, 2024
Expected cash flows		
Expected employer contributions for fiscal year ending September 30, 2026	$ 224,452	
Expected future benefit payments, net of retiree contributions and Medicare subsidy receipts, for fiscal year ending:		
September 30, 2026	$ 25,339,394	
September 30, 2027	25,981,651	
September 30, 2028	26,482,955	
September 30, 2029	26,767,306	
September 30, 2030	26,837,918	
Next five years	127,760,656	
Expected Medicare subsidy receipts for fiscal year ending:		
September 30, 2026	$ (1,559,756)	
September 30, 2027	(1,574,137)	
September 30, 2028	(1,576,905)	
September 30, 2029	(1,576,656)	
September 30, 2030	(1,568,152)	
Next five years	(7,535,970)	
Effect of one percentage point change in the assumed health care cost trend rates		
One percentage point increase		
Effect on total of service and interest cost components	$ 1,780,565	$ 1,676,000
Effect on postretirement benefit obligation	31,923,664	32,128,111
One percentage point decrease		
Effect on total of service and interest cost components	$ (1,437,586)	$ (1,408,162)
Effect on postretirement benefit obligation	(27,603,796)	(27,699,518)

	Fiscal year ending September 30, 2025	Fiscal year ending September 30, 2024
Cumulative employer contributions in excess of net periodic benefit cost		
Amount as of beginning of year	$ 174,482,030	$ 161,868,966
Net periodic benefit (cost)/income for year	11,515,835	13,341,794
Employer contributions made in fiscal year	593,848	478,925
Subsidy payments received	(1,513,864)	(1,207,655)
Amount as of end of year	**$ 185,077,849**	**$ 174,482,030**
Reconciliation of prior service cost/(credit)		
Amount at beginning of year	$ (685,899)	$ (1,114,588)
Amortization	428,689	428,689
Amount arising during year due to plan change	0	0
Amount at end of year	**$ (257,210)**	**$ (685,899)**
Reconciliation of net loss/(gain)		
Amount at beginning of year	$ 127,996	$ (18,440,076)
Amortization	(37,012)	2,266,499
Obligation loss/(gain) during year	17,071,740	54,441,980
Asset loss/(gain) during year	2,650,462	(38,140,407)
Amount at end of year	**$ 19,813,186**	**$ 127,996**

Exhibit A – Trend rates for determining the benefit obligation at September 30, 2025

	Medical				
Year	Pre-65	Post-65	Drug	Medicare Part B	Retiree drug subsidy
2025	7.25%	5.75%	11.75%	5.75%	4.00%
2026	6.91	5.62	10.76	5.62	4.00
2027	6.56	5.49	9.78	5.49	4.00
2028	6.22	5.36	8.79	5.36	4.00
2029	5.88	5.23	7.81	5.23	4.00
2030	5.53	5.11	6.82	5.11	4.00
2031	5.19	4.98	5.83	4.98	4.00
2032	4.85	4.85	4.85	4.85	4.00
2033	4.80	4.80	4.80	4.80	4.00
2034	4.75	4.75	4.75	4.75	4.00
2035	4.71	4.71	4.71	4.71	4.00
2036	4.66	4.66	4.66	4.66	4.00
2037	4.61	4.61	4.61	4.61	4.00
2038	4.57	4.57	4.57	4.57	4.00
2039	4.52	4.52	4.52	4.52	4.00
2040	4.47	4.47	4.47	4.47	4.00
2041	4.42	4.42	4.42	4.42	4.00
2042	4.38	4.38	4.38	4.38	4.00
2043	4.33	4.33	4.33	4.33	4.00
2044	4.28	4.28	4.28	4.28	4.00
2045	4.24	4.24	4.24	4.24	4.00
2046	4.19	4.19	4.19	4.19	4.00
2047	4.14	4.14	4.14	4.14	4.00
2048	4.09	4.09	4.09	4.09	4.00
2049	4.05	4.05	4.05	4.05	4.00
2050+	4.00	4.00	4.00	4.00	4.00

Exhibit B – Trend rates for determining the benefit obligation at September 30, 2024 and the net periodic postretirement benefit cost for 2025

Year	Medical		Drug	Medicare Part B	Retiree Drug Subsidy
	Pre-65	Post-65			
2024	6.25%	5.75%	10.25%	5.75%	4.00%
2025	6.04	5.62	9.47	5.62	4.00
2026	5.84	5.48	8.70	5.48	4.00
2027	5.63	5.35	7.92	5.35	4.00
2028	5.43	5.21	7.14	5.21	4.00
2029	5.22	5.08	6.36	5.08	4.00
2030	5.01	4.94	5.59	4.94	4.00
2031	4.81	4.81	4.81	4.81	4.00
2032	4.76	4.76	4.76	4.76	4.00
2033	4.72	4.72	4.72	4.72	4.00
2034	4.67	4.67	4.67	4.67	4.00
2035	4.63	4.63	4.63	4.63	4.00
2036	4.58	4.58	4.58	4.58	4.00
2037	4.54	4.54	4.54	4.54	4.00
2038	4.49	4.49	4.49	4.49	4.00
2039	4.45	4.45	4.45	4.45	4.00
2040	4.40	4.40	4.40	4.40	4.00
2041	4.36	4.36	4.36	4.36	4.00
2042	4.31	4.31	4.31	4.31	4.00
2043	4.27	4.27	4.27	4.27	4.00
2044	4.22	4.22	4.22	4.22	4.00
2045	4.18	4.18	4.18	4.18	4.00
2046	4.13	4.13	4.13	4.13	4.00
2047	4.09	4.09	4.09	4.09	4.00
2048	4.04	4.04	4.04	4.04	4.00
2049+	4.00	4.00	4.00	4.00	4.00

Exhibit C – Trend rates used for determining the net periodic postretirement benefit cost for 2024

Year	Medical		Drug	Medicare Part B	Retiree Drug Subsidy
	Pre-65	Post-65			
2023	6.25%	5.00%	6.85%	5.00%	6.60%
2024	5.97	4.97	6.45	4.97	6.25
2025	5.69	4.94	6.05	4.94	5.90
2026	5.40	4.90	5.64	4.90	5.54
2027	5.12	4.87	5.24	4.87	5.19
2028	4.84	4.84	4.84	4.84	4.84
2029	4.80	4.80	4.80	4.80	4.80
2030	4.76	4.76	4.76	4.76	4.76
2031	4.71	4.71	4.71	4.71	4.71
2032	4.67	4.67	4.67	4.67	4.67
2033	4.63	4.63	4.63	4.63	4.63
2034	4.59	4.59	4.59	4.59	4.59
2035	4.55	4.55	4.55	4.55	4.55
2036	4.50	4.50	4.50	4.50	4.50
2037	4.46	4.46	4.46	4.46	4.46
2038	4.42	4.42	4.42	4.42	4.42
2039	4.38	4.38	4.38	4.38	4.38
2040	4.34	4.34	4.34	4.34	4.34
2041	4.29	4.29	4.29	4.29	4.29
2042	4.25	4.25	4.25	4.25	4.25
2043	4.21	4.21	4.21	4.21	4.21
2044	4.17	4.17	4.17	4.17	4.17
2045	4.13	4.13	4.13	4.13	4.13
2046	4.08	4.08	4.08	4.08	4.08
2047	4.04	4.04	4.04	4.04	4.04
2048+	4.00	4.00	4.00	4.00	4.00

Section 3
Plan assets

In this section, we present information regarding plan assets as reported by National Fuel Gas Company. The plan assets represent the portion of total plan liabilities which have been funded as of the valuation date.

Section 3.1 Summary of market value of assets as of September 30, 2025

Section 3.2 Reconciliation of assets for fiscal year ending September 30, 2025

Section 3.3 Asset (gain)/loss for fiscal year ending September 30, 2025

Section 3.4 Contributions for fiscal years ending September 30, 2025 and September 30, 2026

Section 3.1: Summary of market value of assets as of September 30, 2025

Summary of VEBA market value of assets as of September 30, 2025

Asset categories	New York Distribution Nonbargaining VEBA	New York Distribution Bargaining VEBA	Pennsylvania Distribution Nonbargaining VEBA	Pennsylvania Distribution Bargaining VEBA	Supply Nonbargaining VEBA	Supply Bargaining VEBA	Total market value
1. Fund assets							
a. Cash and cash equivalents	$ 2,904,161	$ 2,835,011	$ 1,665,786	$ 1,513,165	$ 1,698,859	$ 1,685,070	$ 12,302,052
b. Fixed income	14,125,572	75,465,706	15,642,916	24,974,870	10,686,881	24,704,677	165,600,622
c. Real estate	0	0	0	0	0	0	0
d. Equities	22,383,057	114,722,718	4,948,478	37,145,388	16,912,672	36,282,998	232,395,311
e. Accrued income	9,287	8,784	5,712	5,040	5,563	5,707	40,093
f. Settlement cash	55,256	1,000	(116,625)	1,000	(107,708)	1,000	(166,077)
g. Total fund assets	$ 39,477,333	$ 193,033,219	$ 22,146,267	$ 63,639,463	$ 29,196,267	$ 62,679,452	$ 410,172,001
2. Receivables or payables							
a. Employer contributions	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
b. Accrued admin. expenses	(22,883)	(46,681)	(14,339)	(17,151)	(15,255)	(19,038)	(135,347)
c. Other reimbursement	0	0	0	0	0	0	0
d. Federal income taxes	743,036	0	381,437	0	571,509	0	1,695,982
e. Accumulated deferred income taxes	290,239	0	87,627	0	148,632	0	526,498
f. Contribution correction	0	0	0	0	0	0	0
g. Accrued benefits	(333,498)	(851,710)	(283,759)	(233,020)	(211,697)	(333,031)	(2,246,715)
3. Market value as of September 30, 2025	**$ 40,154,227**	**$ 192,134,828**	**$ 22,317,233**	**$ 63,389,292**	**$ 29,689,456**	**$ 62,327,383**	**$ 410,012,419**

Summary of 401(h) market value of assets as of September 30, 2025

Asset categories	New York Distribution Nonbargaining 401(h)	Pennsylvania Distribution Nonbargaining 401(h)	Supply Nonbargaining 401(h)	Total market value
1. Fund assets				
a. Cash and cash equivalents	$ 1,890,937	$ 826,532	$ 674,976	$ 3,392,445
b. Equities	4,416,180	1,930,320	1,576,369	7,922,869
c. Fixed income	36,376,767	15,900,354	12,984,796	65,261,917
d. Real estate	5,680,601	2,483,002	2,027,708	10,191,311
e. Venture capital	0	0	0	0
f. Accrued income	310,017	135,509	110,661	556,187
g. Other (hedge fund to fund)	0	0	0	0
h. Total fund assets	$ 48,674,502	$ 21,275,717	$ 17,374,510	$ 87,324,729
2. Receivables or payables				
a. Employer contributions	$ 0	$ 0	$ 0	$ 0
b. Accrued admin. expenses	0	0	0	0
c. Payable to brokers	(686,472)	(300,058)	(245,038)	(1,231,568)
3. Market value as of September 30, 2025	**$ 47,988,030**	**$ 20,975,659**	**$ 17,129,472**	**$ 86,093,161**

Section 3.2: Reconciliation of assets for fiscal year ending September 30, 2025

Reconciliation of VEBA assets

Asset categories	New York Distribution Nonbargaining VEBA	New York Distribution Bargaining VEBA	Pennsylvania Distribution Nonbargaining VEBA	Pennsylvania Distribution Bargaining VEBA	Supply Nonbargaining VEBA	Supply Bargaining VEBA	Total Market Value
1. Market value as of October 1, 2024	**$ 42,382,831**	**$ 191,499,183**	**$ 23,918,799**	**$ 62,007,691**	**$ 30,762,180**	**$ 61,812,613**	**$ 412,383,297**
2. Receipts							
a. Employer contributions	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
b. Participant contributions	792,005	1,263,107	317,120	407,195	348,169	469,736	3,597,332
c. Total	$ 792,005	$ 1,263,107	$ 317,120	$ 407,195	348,169	469,736	3,597,332
3. Disbursements							
a. Benefit payments	$ (4,518,952)	$ (11,482,911)	$ (2,571,988)	$ (2,580,491)	$ (2,452,225)	$ (3,443,882)	$ (27,050,449)
b. Administrative expenses	(239,650)	(507,656)	(289,255)	(169,901)	(297,067)	(190,693)	(1,694,222)
c. Change in tax position	(636,030)	0	(356,711)	0	(462,791)	0	(1,455,532)
d. Total	$ (5,394,632)	$ (11,990,567)	$ (3,217,954)	$ (2,750,392)	$ (3,212,083)	$ (3,634,575)	$ (30,200,203)
4. Investment income							
a. Interest and dividends	$ 1,388,577	$ 6,734,799	$ 770,783	$ 2,205,569	$ 1,022,472	$ 2,181,832	$ 14,304,032
b. Net realized appreciation/(depreciation)	(5,120,733)	(22,054,273)	(2,733,103)	(7,370,708)	(3,675,177)	(7,072,216)	(48,026,210)
c. Net unrealized appreciation/(depreciation)	6,106,179	26,682,579	3,261,588	8,889,937	4,443,895	8,569,993	57,954,171
d. Total	$ 2,374,023	$ 11,363,105	$ 1,299,268	$ 3,724,798	$ 1,791,190	$ 3,679,609	$ 24,231,993
5. Market value as of September 30, 2025	**$ 40,154,227**	**$ 192,134,828**	**$ 22,317,233**	**$ 63,389,292**	**$ 29,689,456**	**$ 62,327,383**	**$ 410,012,419**

Reconciliation of 401(h) assets

Asset categories	New York Distribution Nonbargaining 401(h)	Pennsylvania Distribution Nonbargaining 401(h)	Supply Nonbargaining 401(h)	Total market value
1. Market value as of October 1, 2024	**$ 46,643,780**	**$ 20,388,085**	**$ 16,649,637**	**$ 83,681,502**
2. Receipts				
a. Employer contributions	$ 0	$ 0	$ 0	$ 0
b. Participant contributions	0	0	0	0
c. Total	$ 0	$ 0	$ 0	$ 0
3. Disbursements				
a. Benefit payments	$ 0	$ 0	$ 0	$ 0
b. Administrative expenses	(149,272)	(65,247)	(53,283)	(267,802)
c. Change in tax position	0	0	0	0
d. Total	$ (149,272)	(65,247)	(53,283)	(267,802)
4. Investment income				
a. Interest and dividends	$ 1,956,091	$ 855,011	$ 698,233	$ 3,509,335
b. Net realized appreciation/(depreciation)	(1,075,607)	(470,150)	(383,941)	(1,929,698)
c. Net unrealized appreciation/(depreciation)	613,038	267,960	218,826	1,099,824
d. Total	$ 1,493,522	$ 652,821	$ 533,118	$ 2,679,461
5. Market value as of September 30, 2025	**$ 47,988,030**	**$ 20,975,659**	**$ 17,129,472**	**$ 86,093,161**

Section 3.3: Asset (gain)/loss

Determination of asset (gain)/loss

			Fiscal year ending September 30, 2025
1.	Market value at September 30, 2025	$	496,105,580
2.	Net actual distributions[5]		22,533,101
3.	Actual employer contributions[6]		(920,016)
4.	Market value at September 30, 2024		496,064,799
5.	Actual return on assets (1. + 2. - 3. - 4.)	$	23,493,898
6.	Expected return on assets		26,144,360
7.	**Asset (gain)/loss** (6. - 5.)	**$**	**2,650,462**

[5] Net of retiree drug subsidy receipts and participant contributions.
[6] Net of retiree drug subsidy receipts.

Section 3.4: Contributions

Employer VEBA contributions for fiscal year ending September 30, 2025

Date	New York Distribution Nonbargaining VEBA	New York Distribution Bargaining VEBA	Pennsylvania Distribution Nonbargaining VEBA	Pennsylvania Distribution Bargaining VEBA	Supply Nonbargaining VEBA	Supply Bargaining VEBA	Total contributions
N/A	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0

Expected employer VEBA contributions for the fiscal year ending September 30, 2026

Date	New York Distribution Nonbargaining VEBA	New York Distribution Bargaining VEBA	Pennsylvania Distribution Nonbargaining VEBA	Pennsylvania Distribution Bargaining VEBA	Supply Nonbargaining VEBA	Supply Bargaining VEBA	Total contributions
N/A	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0

Employer 401(h) contributions for fiscal year ending September 30, 2025

Date	New York Distribution Nonbargaining 401(H)	Pennsylvania Distribution Nonbargaining 401(H)	Supply Nonbargaining 401(H)	Total contributions
N/A	$ 0	$ 0	$ 0	$ 0

Expected employer 401(h) contributions for fiscal year ending September 30, 2026

Date	New York Distribution Nonbargaining 401(H)	Pennsylvania Distribution Nonbargaining 401(H)	Supply Nonbargaining 401(H)	Total contributions
N/A	$ 0	$ 0	$ 0	$ 0

Section 4

Basis of valuation

In this section, the basis of the valuation is presented. The provisions of the plan and the participant census are the foundation of the valuation, since these are the present facts upon which the projection of benefit payments depends. The valuation is based on the premise that the plan will continue in existence, so that future events must also be considered. These future events are assumed to occur in accordance with the actuarial assumptions and methods described in this section.

Section 4.1 Plan participants

Section 4.2 Actuarial basis

Section 4.3 Summary of plan provisions

Section 4.4 Claim cost development and medical rate information

Section 4.1: Plan participants

Mercer has used and relied on participant data supplied by National Fuel Gas Company. National Fuel Gas Company is responsible for ensuring that the participant data provides an accurate description of all persons who are participants under the terms of the plan or otherwise entitled to benefits as of January 1, 2025 and that the data is sufficiently comprehensive and accurate for its intended purpose. If the data supplied is not sufficiently comprehensive and accurate for its intended purpose, the results of our calculations may differ significantly from the results that would be obtained with such data. Although Mercer has reviewed the suitability of the data for its intended use in accordance with Actuarial Standard of Practice No. 23, Mercer has not verified or audited any of the data or information provided.

A. Prescription drug participation statistics by subsidiary

	Actives			Retirees			Surviving spouses			
	Bargaining	Non-bargaining	Total	Bargaining	Non-bargaining	Total	Bargaining	Non-bargaining	Total	Grand total
NY Distribution	26	54	80	726	326	1,052	38	25	63	1,195
PA Distribution	5	18	23	175	145	320	0	10	10	353
Supply	14	33	47	229	192	421	2	11	13	481
SRC	0	1	1	0	6	6	0	2	2	9
Parent	0	0	0	0	9	9	0	1	1	10
Empire Pipeline	0	0	0	0	0	0	0	0	0	0
Midstream	0	1	1	0	0	0	0	0	0	1
Total	45	107	152	1,130	678	1,808	40	49	89	2,049

B. Medical plan participation statistics by subsidiary

	Actives			Retirees			Surviving spouses			
	Bargaining	Non-bargaining	Total	Bargaining	Non-bargaining	Total	Bargaining	Non-bargaining	Total	Grand total
NY Distribution	45	54	99	734	326	1,060	38	25	63	1,222
PA Distribution	5	18	23	175	145	320	0	10	10	353
Supply	23	33	56	229	191	420	2	11	13	489
SRC	0	1	1	0	6	6	0	2	2	9
Parent	0	0	0	0	9	9	0	1	1	10
Empire Pipeline	0	0	0	0	0	0	0	0	0	0
Midstream	0	1	1	0	0	0	0	0	0	1
Total	73	107	180	1,138	677	1,815	40	49	89	2,084

C. Life insurance participation statistics by subsidiary

	Actives			Retirees				
	Bargaining	Non-bargaining	Total	Bargaining	Non-bargaining	Total	Surviving spouses	Grand Total
NY Distribution	45	49	94	781	334	1,115	0	1,209
PA Distribution	5	17	22	177	145	322	0	344
Supply	23	29	52	235	188	423	0	475
SRC	0	6	6	0	40	40	0	46
Parent	0	0	0	0	8	8	0	8
Empire Pipeline	0	0	0	0	0	0	0	0
Midstream	0	1	1	0	0	0	0	1
Total	73	102	175	1,193	715	1,908	0	2,083

D. Medicare Part B reimbursement participation statistics by subsidiary

	Actives			Retirees				
	Bargaining	Non-bargaining	Total	Bargaining	Non-bargaining	Total	Surviving spouses	Grand Total
NY Distribution	35	0	35	523	73	596	0	631
PA Distribution	5	0	5	177	32	209	0	214
Supply	20	0	20	227	52	279	0	299
SRC	0	0	0	0	1	1	0	1
Parent	0	0	0	0	1	1	0	1
Empire Pipeline	0	0	0	0	0	0	0	0
Midstream	0	0	0	0	0	0	0	0
Total	60	0	60	927	159	1,086	0	1,146

E. Participant data reconciliation – Prescription drug

	Actives	Inactive participants		Total
		Retirees	Surviving spouses	
As of January 1, 2024	184	1,860	93	2,137
Retirements	(30)	30	0	0
Active deaths with surviving spouses	0	0	0	0
Active deaths without surviving spouses	0	0	0	0
Inactive deaths with surviving spouse	0	(5)	5	0
Inactive deaths without surviving spouse	0	(72)	(9)	(81)
Terminations with no benefit due	0	0	0	0
Discontinued coverage	(2)	(8)	0	(10)
Renewed coverage	0	3	0	3
Data adjustments	0	0	0	0
Net change	(32)	(52)	(4)	(88)
As of December 31, 2024	152	1,808	89	2,049

F. Participant data reconciliation – Medical

	Actives	Inactive participants		Total
		Retirees	Surviving spouses	
As of January 1, 2024	212	1,867	93	2,172
Retirements	(31)	31	0	0
Active deaths with surviving spouses	0	0	0	0
Active deaths without surviving spouses	0	0	0	0
Inactive deaths with surviving spouse	0	(5)	5	0
Inactive deaths without surviving spouse	0	(72)	(9)	(81)
Terminations with no benefit due	0	0	0	0
Discontinued coverage	(1)	(9)	0	(10)
Renewed coverage	0	3	0	3
Data adjustments	0	0	0	0
Net change	(32)	(52)	(4)	(88)
As of December 31, 2024	180	1,815	89	2,084

G. Participant data reconciliation – Life insurance

	Actives	Inactive participants		Total
		Retirees	Surviving spouses	
As of January 1, 2024	209	1,952	0	2,161
Retirements	(34)	34	0	0
Active deaths	0	0	0	0
Inactive deaths	0	(78)	0	(78)
Terminations with no benefit due	0	0	0	0
Data adjustments	0	0	0	0
Net change	(34)	(44)	0	(78)
As of December 31, 2024	175	1,908	0	2,083

H. Participant data reconciliation – Medicare Part B reimbursement

	Actives	Inactive participants		Total
		Retirees	Surviving spouses	
As of January 1, 2024	68	1,140	0	1,208
Retirements	(8)	8	0	0
Active deaths	0	0	0	0
Inactive deaths	0	(62)	0	(62)
Terminations with no benefit due	0	0	0	0
No longer eligible	0	0	0	0
Data adjustments	0	0	0	0
Net change	(8)	(54)	0	(62)
As of December 31, 2024	60	1,086	0	1,146

I. Distribution of active participants as of December 31, 2024 – Prescription drug

Age	Years of service									Total
	< 5	5 - 9	10 - 14	15 - 19	20 - 24	25 - 29	30 - 34	35 - 39	40 +	
< 25										
25 - 29										
30 - 34										
35 - 39										
40 - 44					2	1				3
45 - 49					9	5				14
50 - 54					7	8	7	1		23
55 - 59					12	12	23	11		58
60 - 64					6	2	6	17	8	39
65 - 69					1		1	2	7	11
70 - 74									2	2
75 +									2	2
Total					37	28	37	31	19	152

J. Distribution of active participants as of December 31, 2024 – Medical

Age	Years of service									Total
	< 5	5 - 9	10 - 14	15 - 19	20 - 24	25 - 29	30 - 34	35 - 39	40 +	
< 25										
25 - 29										
30 - 34										
35 - 39										
40 - 44					2	1				3
45 - 49					12	7				19
50 - 54					15	14	7	1		37
55 - 59					14	14	23	11		62
60 - 64					10	2	6	17	8	43
65 - 69					1		1	2	7	11
70 - 74						1			2	3
75 +									2	2
Total					54	39	37	31	19	180

K. Distribution of active participants as of December 31, 2024 – Life insurance

Age	Years of service									Total
	< 5	5 - 9	10 - 14	15 - 19	20 - 24	25 - 29	30 - 34	35 - 39	40 +	
< 25										
25 - 29										
30 - 34										
35 - 39										
40 - 44					2	1				3
45 - 49					12	7				19
50 - 54					17	15	6	1		39
55 - 59					13	13	21	11		58
60 - 64					10	2	6	17	8	43
65 - 69					1			2	5	8
70 - 74						1			2	3
75 +									2	2
Total					55	39	33	31	17	175

L. Distribution of active participants as of December 31, 2024 – Medicare Part B reimbursement

Age	Years of service									Total
	< 5	5 - 9	10 - 14	15 - 19	20 - 24	25 - 29	30 - 34	35 - 39	40 +	
< 25										
25 - 29										
30 - 34										
35 - 39										
40 - 44					1	1				2
45 - 49					4	4				8
50 - 54					12	8	1			21
55 - 59					7	6	3	1		17
60 - 64					9			2		11
65 - 69						1				1
70 - 74										
75 +										
Total					33	20	4	3		60

M. Distribution of inactive participants as of December 31, 2024 – Prescription drug

Age	Retirees	Surviving spouses	Total
< 50	0	0	0
50-54	0	0	0
55-59	20	0	20
60-64	146	0	146
65-69	260	6	266
70-74	359	8	367
75-79	445	30	475
80-84	299	15	314
85-89	184	16	200
90-94	73	10	83
95 +	22	4	26
Total	1,808	89	1,897

N. Distribution of inactive participants as of December 31, 2024 – Medical

Age	Retirees	Surviving spouses	Total
< 50	0	0	0
50-54	1	0	1
55-59	21	0	21
60-64	148	0	148
65-69	264	6	270
70-74	360	8	368
75-79	444	30	474
80-84	299	15	314
85-89	183	16	199
90-94	73	10	83
95 +	22	4	26
Total	1,815	89	1,904

O. Distribution of inactive participants as of December 31, 2024 – Life insurance

Age	Retirees	Surviving spouses	Total
< 50	0	0	0
50-54	1	0	1
55-59	25	0	25
60-64	159	0	159
65-69	309	0	309
70-74	380	0	380
75-79	453	0	453
80-84	302	0	302
85-89	185	0	185
90-94	72	0	72
95 +	22	0	22
Total	1,908	0	1,908

P. Distribution of inactive participants as of December 31, 2024 – Medicare Part B reimbursement

Age	Retirees	Surviving spouses	Total
< 50	0	0	0
50-54	1	0	1
55-59	9	0	9
60-64	57	0	57
65-69	101	0	101
70-74	170	0	170
75-79	228	0	228
80-84	248	0	248
85-89	176	0	176
90-94	74	0	74
95 +	22	0	22
Total	1,086	0	1,086

Section 4.2: Actuarial basis

An actuarial valuation is only a snapshot of a plan's estimated financial condition at a particular point in time; it does not predict a plan's future financial condition or its ability to pay benefits in the future and does not provide any guarantee of future financial soundness of a plan. Over time, a plan's total cost will depend on a number of factors, including the amount of benefits the plan pays, the number of people paid benefits, the period of time over which benefits are paid, plan expenses, and the amount earned on any assets invested to pay benefits. These amounts and other variables are uncertain and unknowable at the valuation date.

Because modeling all aspects of a situation is not possible or practical, we may use summary information, estimates, or simplifications of calculations to facilitate the modeling of future events in an efficient and cost-effective manner. We may also exclude factors or data that, if used, would not, in our judgment, significantly affect our results. Use of such simplifying techniques does not, in our judgment, affect the reasonableness of valuation results for a plan.

Valuations do not affect the ultimate cost of a plan, only the timing of when benefit costs are recognized. Cost recognition occurs over time. If the costs recognized over a period of years are lower or higher than necessary, for whatever reason, normal and expected practice is to adjust future cost levels to recognize the entire cost of a plan over time.

A. Accounting methods

Actuarial cost method

Benefit obligations are estimated using the Projected Unit Credit method. The objective under this method is to expense each participant's benefits under the plan as they would accrue, taking into consideration the plan's benefit allocation formula. Thus, the estimated total benefit to which each participant is expected to become entitled at retirement is broken down into units, each associated with a year of past or future service.

An individual's estimated accrued benefit for valuation purposes is the projected benefit at full eligibility date, or current age if later, multiplied by the ratio of service at the valuation date over service at full eligibility date. Service for this purpose is measured from date of hire. The portion of the present value which is attributed to the current year is the service cost. The portion of the present value attributed to prior periods is the accumulated postretirement benefit obligation (APBO) or accrued liability. The APBO can also be viewed as the accumulated value of past service costs. This amount includes the entire present value for actives who are eligible to retire and those who are already retired.

The plan's service cost is estimated by combining the individual service costs, and the plan's APBO is estimated by combining the individual benefit obligations.

Asset method

The market-related value of assets is equal to the market value.

Changes since prior valuation

None.

B. Accounting policies

Measurement date

September 30.

Amortization of prior service costs/credits
Prior service costs/credits that arise due to a plan change during a fiscal year are amortized on a straight-line basis over the average remaining service period to full eligibility of participants who are expected to receive a benefit and are active at the date of the plan amendment.

Amortization of gains/losses
New York Distribution: Gains/losses are amortized on a vintage-year basis over 10 years. This is the method prescribed by the New York Public Service Commission in their policy statement for rate reimbursement in New York and is acceptable under US GAAP since it results in more rapid amortization of gains/losses than the minimum imposed under the standards.

All entities other than New York Distribution: Gains/losses in excess of 10% of the greater of the APBO or market-related value of plan assets (determined solely with respect to those entities) are amortized on a straight-line basis over the average future working lifetime of the employees of those entities expected to receive benefits under the plan.

Changes since prior valuation
None.

C. Valuation procedures

Financial and claims data
We have used financial data, claims, and premiums supplied by the plan sponsor, without further audit. Customarily, this information would not be verified by a plan's actuary. We have reviewed the information for internal consistency and we have no reason to doubt its substantial accuracy.

Determination of benefit obligations
The benefit obligations are determined by discounting each year's cash flows using the corresponding rate from the Above Mean Mercer Yield Curve as of the measurement date.

Calculation of interest
Interest on the benefit obligations for purposes of determining the interest cost and service cost components of the net periodic postretirement benefit cost is calculated by applying interest to the present value of the expected payment at each payment date. For this purpose, interest is determined using the same spot rate used to determine the present value of the associated payment.

Effective discount rate
The effective discount rate is the single equivalent rate such that the present value of the plan's APBO cash flows using the single rate equals the present value of those cash flows using the corresponding spot rates along the Above Mean Mercer Yield Curve. The same process is applied to the plan's service cost cash flows to determine the effective discount rate associated with the service cost.

Effective rate for interest
The effective rate for interest on the benefit obligation is the single equivalent rate such that interest on the plan's APBO using the single rate equals the sum of the interest on each year's discounted cash flow determined using the corresponding spot rates along the Above Mean Mercer Yield Curve. The same process is applied to the plan's discounted service cost cash flows to determine the effective rate for interest on the service cost.

Projection of obligations

APBO and service cost cash flows are determined as of the census date reflecting disclosed assumption changes and then adjusted to the measurement date to reflect additional service accruals during the interim period and to exclude payments expected to be made prior to the measurement date. Differences between actual and expected benefit payments for the period between the census date and the measurement date are recognized proportionally in all future cash flows.

Changes since prior valuation

None.

D. Actuarial assumptions

To prepare an actuarial valuation, assumptions are used in a forward-looking financial and demographic model to present a single scenario from a wide range of possibilities. The future is uncertain and the plan's actual experience will differ from those assumptions. These differences may be significant or material because actuarial estimates can be very sensitive to the assumptions made and, in some cases, to the interaction between the assumptions.

Different assumptions or scenarios within the range of possibilities may also be reasonable and results based on alternative assumptions would be different. As a result of the uncertainty inherent in a forward-looking projection over a very long period of time, no one projection is uniquely "correct" and many alternative projections of the future could also be regarded as reasonable. Two different actuaries could, quite reasonably, arrive at different results based on the same data and different views of the future. A "sensitivity analysis" shows the degree to which results would be different if alternative assumptions are used for the actuarial estimates. At National Fuel Gas Company's request, Mercer is available to perform such an analysis.

Assumptions may change from one valuation to the next because of changes in requirements, plan experience, changes in expectations about the future, and other factors. A change in assumptions is not an indication that prior assumptions were unreasonable when made.

Economic assumptions

Effective discount rate for benefit obligation

- 5.99% per annum for determining the 2024 net periodic postretirement benefit cost.
- 4.98% per annum for determining the September 30, 2024 benefit obligation and the 2025 net periodic postretirement benefit cost.
- 5.30% per annum for determining the September 30, 2025 benefit obligation.

Effective rate for interest on the benefit obligation

- 5.93% per annum for determining the 2024 net periodic postretirement benefit cost.
- 4.69% per annum for determining the 2025 net periodic postretirement benefit cost.

Effective discount rate for service cost

- 5.99% per annum for determining the 2024 net periodic postretirement benefit cost.
- 5.21% per annum for determining the 2025 net periodic postretirement benefit cost.

Effective rate for interest on the service cost

- 6.01% per annum for determining the 2024 net periodic postretirement benefit cost.
- 5.14% per annum for determining the 2025 net periodic postretirement benefit cost.

Rationale: The effective rates are determined using Mercer's proprietary Above Mean Yield Curve, under which the plan's projected benefit payments are matched against a series of spot rates derived from a market basket of high-quality fixed income securities.

Expected long-term rate of return on assets

- 6.00% per annum for determining the 2024 net periodic postretirement benefit cost.
- 5.40% per annum for determining the 2025 net periodic postretirement benefit cost.

Rationale: To develop the expected rate of return on assets, the Company considered the current level of expected returns on risk-free investments (primarily government bonds), the historical level of the risk premium associated with the other asset classes in which the portfolio is invested, and the expectations for future returns of each asset class. The expected rate of return for each asset class was then weighted based on the asset allocation to develop the expected rate of return on assets for the plan.

Salary increases

Age	Rate
25	9.50%
30	8.50
35	6.50
40	6.00
45	5.50
50	5.00
55	4.50
60	4.00

Rationale: These rates have been used historically and have not produced significant gains or losses.

Demographic assumptions

Mortality

- Pri-2012 mortality tables (with no collar adjustment), with separate rates for males/females, healthy/disabled participants, and annuitants/non-annuitants, projected with generational improvement using scale MSS-2023 for determining the 2024 net periodic postretirement benefit cost.
- Pri-2012 mortality tables (with no collar adjustment), with separate rates for males/females, healthy/disabled participants, and annuitants/non-annuitants, projected with generational improvement using Scale MSS-2024 for determining the September 30, 2024 benefit obligation and the 2025 net periodic postretirement benefit cost.
- Pri-2012 mortality tables (with no collar adjustment), with separate rates for males/females, healthy/disabled participants, and annuitants/non-annuitants, projected with generational improvement using Scale MSS-2025 for determining the September 30, 2025 benefit obligation.

Rationale: Mortality is based on the Society of Actuaries' Pri-2012 tables. The rates based on the full data set are used because the plan's participants are a mix of blue-collar and white-collar individuals. Future mortality improvement is based on the 2025 Trustees Report of the Social Security Administration, as reflected in the Mercer-developed MSS-2025 improvement scale. The improvement rates implied by the report's mortality projections are based on an analysis of the specific factors that impact mortality improvement as well as potential long-term trends for those factors.

Termination rates

0.50% of the active population is assumed to terminate employment annually.

Retirement rates

Age	Rate
55 - 56	7%
57 - 59	10
60 - 61	25
62	75
63 - 64	50
65	100

Rationale: These rates have been used historically and have not produced significant gains or losses.

Disability incidence

1985 pension disability class 1 incidence rates.

Spouse assumptions

80% of active male participants and 60% of active female participants are assumed to be married, and a female is assumed to be three years younger than her spouse. Actual spousal data was used for participants in pay status if available.

Participation	**Medical and Drug coverage:** 100% of eligible retirees are assumed to elect coverage. 100% of retirees electing coverage who have spouses are assumed to elect spousal coverage. It is assumed that upon retiring, participants remain in the same medical plan category (PPO, traditional, or Independent Health). For participants who do not have coverage as active employees, it is assumed that they elect coverage under the traditional plan upon retirement. Upon reaching age 65, it is assumed that participants in the PPO plan elect a traditional plan, and that all others remain in the same plan category (traditional or Independent Health). Further, it is assumed that actives in medical grid numbers 7, 8, 11, and 12 will remain in those groups at retirement and, therefore, receive prescription drug coverage through the Medical Plan. For all other eligible actives, it is assumed that they will have prescription drug coverage under a 3-tier plan upon retirement. **Life Insurance coverage:** It is assumed that upon retiring, all employees who are eligible for Basic Life Insurance will be covered. Only those employees who elect Supplemental Life Insurance as active employees are assumed to elect Supplemental Life Insurance upon retirement. Note that National Fuel Gas Company does not subsidize any portion of the Supplemental Life Insurance with the exception of a small group of retirees hired prior to 1978.

Rationale: Assumed participation is based on recent plan experience and the options available to retirees.

Claims assumptions

Medical and prescription drug starting claim costs

The starting claim costs for National Fuel Gas Company's Independent Health Plan are based on the premium rates shown in Section 4.4 since that plan is community rated. Since all other plans are self-insured, the average per person gross costs of medical and prescription drug benefits, excluding expenses, were derived from claims data provided by National Fuel Gas Company. These starting claim costs are shown below. A description of the methodology used to develop these claim costs is contained in Section 4.4.

Annual age 65 per capita claim costs

	2024 Disclosure/ 2025 NPPBC	2025 Disclosure/ 2026 NPPBC
Prescription drug plans		
$0/$1 Plan and $0/$2 Plan	$4,484	$4,974
$5/$10 Plan	$4,191	$4,648
Tier Plans[7]	$3,366	$3,733
Rx for grids 7/8/11/12	$3,834	$4,253

Medical plans	Pre 65	Post 65	Pre 65	Post 65
PPO Plan	$8,629	$2,136	$8,496	$2,394
Traditional Plans[8]	$8,865	$2,136	$8,728	$2,394
Forever Blue	N/A	$1,580	N/A	$1,687
Independent Health	$7,992	$2,338	$8,639	$2,394

Rationale: The development of the average annual age 65 per capita claim costs is described in Section 4.4.

[7] Includes prescription drug plans with tier copayments of $12.50/$24/$40 for generic/brand/specialty.

[8] For participants in the medical plan "comprehensive with Rx" (medical grids 7, 8, 11, and 12), the drug portion of the benefit was valued separately using the claim costs shown for that plan in the prescription drug section, above.

Medicare reform

The Medicare Prescription Drug, Improvement, and Modernization Act of 2003 (the "Act") is reflected assuming that National Fuel Gas Company will continue to provide a post-65 prescription drug benefit to retirees that is at least actuarially equivalent to Medicare Part D and that National Fuel Gas Company will receive the federal subsidy for all retirees and their spouses.

The Act was recognized for the 2024 disclosure and 2025 net periodic postretirement benefit cost by assuming an annual savings of $548 at age 65, and for the 2025 disclosure by assuming an annual savings of $537 at age 65.

Rationale: The RDS assumption was developed based on actual claims and enrollment from the 2021, 2022 and 2023 RDS applications, trended forward to the valuation year, and adjusted for plan design changes and participation.

Medicare Part B premium

In addition to medical costs, National Fuel Gas Company pays the Medicare Part B premium for retirees and their spouses (except for post-12/31/2000 non-union and IBEW Local 2199 and 2199-J retirements) until the death of the retiree. The assumed Medicare Part B premiums are shown below.

	2024 Disclosure/ 2025 NPPBC	2025 Disclosure/ 2026 NPPBC
Monthly	$174.70	$185.00
Annual	$2,096.40	$2,220.00

Rationale: The 2025 Medicare Part B premium rate is the rate as announced by the Centers for Medicare & Medicaid Services.

Life insurance costs

Life insurance coverage is provided to eligible retirees as summarized in Section 4.3. Note that National Fuel Gas Company does not subsidize any portion of the Supplemental Life Insurance with the exception of a small group of retirees hired prior to 1978.

Administrative expenses

Expenses are assumed to be equal to the following, where percentages represent a percentage of the respective claim costs:

	2024 Disclosure/ 2025 NPPBC	2025 Disclosure/ 2026 NPPBC
Life insurance	10%	10%
Medical[9]	$993.41 per contract	$1,104.34 per contract
Drug	0% (Included in claim costs)	0% (Included in claim costs)

Administrative expenses on a per capita basis for the Medical Plan are expected to grow at 4% per year.

Life Insurance expenses are assumed to remain at 10% of claims.

Rationale: Assumed administrative expenses for the life insurance are based on the actuary's experience with similar plans. Assumed administrative expenses for the self-insured medical plans are based on administrative fees provided by National Fuel Gas. The premiums for insured coverage are assumed to include administrative fees.

Retiree contributions

See Section 4.4.

For non-grandfathered[10] participants, the contribution amounts shown in Section 4.4 are allocated to medical versus drug coverage as follows:

	Medical	Drug
Pre-65	61.2%	38.8%
Post-65	39.6%	60.4%

Assumed retiree contributions are based on per capita claims costs and the provisions of the plan.

Future increases in retiree contribution levels

For grandfathered participants, no increases in retiree contribution amounts are assumed.

For non-grandfathered participants, retiree contribution amounts are assumed to increase at assumed health care trend rates.

Rationale: This assumption is based on our understanding that future increases to healthcare costs for non-grandfathered participants will be passed on to the participants.

[9] For the 2024 disclosure/2025 NPPBC, this represents the weighted administrative expense assumption for the 2024 calendar year, based on $990.05 per non-executive contract and $2,505.84 per executive contract. For the 2025 disclosure/2026 NPPBC, this represents the weighted administrative expense assumption for the 2025 calendar year, based on $1,100.54 per non-executive contract and $2,769.72 per executive contract.

[10] Participants who are grandfathered, and therefore unaffected by the 2008 and 2009 plan changes, include those already retired at the plan change date for their respective employee group. All others are non-grandfathered.

Death benefits

Medicare Part B reimbursement benefits cease upon death of the retiree. Spouses are assumed to continue medical and prescription drug coverage for life, 3 years, or not at all (COBRA), depending on their eligibility as defined in Section 3.3. Spouses of post-12/31/2000 non-union and IBEW Local 2199 and 2199-J retirees continue to contribute the amount the retiree was contributing before death. For all others, the spousal death benefit coverage is offset by the widow rate reimbursement identified in Section 4.3. Widow rates are increased in the future for health care trend.

Rationale: This assumption has been used historically and has not produced significant gains or losses.

Aging

The Medical Aging Factors shown below apply to all medical plans offered. The Drug Aging Factors apply to all drug plans offered.

Attained age	Medical Aging Factor	Drug Aging Factor
55	0.680	0.780
60	0.820	0.899
65	1.000	1.000
70	1.130	1.077
75	1.245	1.097
80	1.330	1.097
85	1.370	1.097
90+	1.390	1.097

Rationale: The aging assumption was based on a review of health care costs by age sponsored by the Society of Actuaries titled ***Health Care Costs – From Birth to Death*** *and published in June 2013 as well as Mercer and vendor databases of prescription drug cost results by age.*

Health care trend

- Trend rates for determining the benefit obligation at September 30, 2025:

	Medical				
Year	Pre-65	Post-65	Drug	Medicare Part B	Retiree drug subsidy
2025	7.25%	5.75%	11.75%	5.75%	4.00%
2026	6.91	5.62	10.76	5.62	4.00
2027	6.56	5.49	9.78	5.49	4.00
2028	6.22	5.36	8.79	5.36	4.00
2029	5.88	5.23	7.81	5.23	4.00
2030	5.53	5.11	6.82	5.11	4.00
2031	5.19	4.98	5.83	4.98	4.00
2032	4.85	4.85	4.85	4.85	4.00
2033	4.80	4.80	4.80	4.80	4.00
2034	4.75	4.75	4.75	4.75	4.00
2035	4.71	4.71	4.71	4.71	4.00
2036	4.66	4.66	4.66	4.66	4.00
2037	4.61	4.61	4.61	4.61	4.00
2038	4.57	4.57	4.57	4.57	4.00
2039	4.52	4.52	4.52	4.52	4.00
2040	4.47	4.47	4.47	4.47	4.00
2041	4.42	4.42	4.42	4.42	4.00
2042	4.38	4.38	4.38	4.38	4.00
2043	4.33	4.33	4.33	4.33	4.00
2044	4.28	4.28	4.28	4.28	4.00
2045	4.24	4.24	4.24	4.24	4.00
2046	4.19	4.19	4.19	4.19	4.00
2047	4.14	4.14	4.14	4.14	4.00
2048	4.09	4.09	4.09	4.09	4.00
2049	4.05	4.05	4.05	4.05	4.00
2050+	4.00	4.00	4.00	4.00	4.00

- Trend rates for determining the benefit obligation at September 30, 2024 and the net periodic postretirement benefit cost for 2025:

	Medical				
Year	Pre-65	Post-65	Drug	Medicare Part B	Retiree drug subsidy
2024	6.25%	5.75%	10.25%	5.75%	4.00%
2025	6.04	5.62	9.47	5.62	4.00
2026	5.84	5.48	8.70	5.48	4.00
2027	5.63	5.35	7.92	5.35	4.00
2028	5.43	5.21	7.14	5.21	4.00
2029	5.22	5.08	6.36	5.08	4.00
2030	5.01	4.94	5.59	4.94	4.00
2031	4.81	4.81	4.81	4.81	4.00
2032	4.76	4.76	4.76	4.76	4.00
2033	4.72	4.72	4.72	4.72	4.00
2034	4.67	4.67	4.67	4.67	4.00
2035	4.63	4.63	4.63	4.63	4.00
2036	4.58	4.58	4.58	4.58	4.00
2037	4.54	4.54	4.54	4.54	4.00
2038	4.49	4.49	4.49	4.49	4.00
2039	4.45	4.45	4.45	4.45	4.00
2040	4.40	4.40	4.40	4.40	4.00
2041	4.36	4.36	4.36	4.36	4.00
2042	4.31	4.31	4.31	4.31	4.00
2043	4.27	4.27	4.27	4.27	4.00
2044	4.22	4.22	4.22	4.22	4.00
2045	4.18	4.18	4.18	4.18	4.00
2046	4.13	4.13	4.13	4.13	4.00
2047	4.09	4.09	4.09	4.09	4.00
2048	4.04	4.04	4.04	4.04	4.00
2049+	4.00	4.00	4.00	4.00	4.00

- Trend rates for determining the net periodic postretirement benefit cost for 2024:

	Medical				
Year	Pre-65	Post-65	Drug	Medicare Part B	Retiree drug subsidy
2023	6.25%	5.00%	6.85%	5.00%	6.60%
2024	5.97	4.97	6.45	4.97	6.25
2025	5.69	4.94	6.05	4.94	5.90
2026	5.40	4.90	5.64	4.90	5.54
2027	5.12	4.87	5.24	4.87	5.19
2028	4.84	4.84	4.84	4.84	4.84
2029	4.80	4.80	4.80	4.80	4.80
2030	4.76	4.76	4.76	4.76	4.76
2031	4.71	4.71	4.71	4.71	4.71
2032	4.67	4.67	4.67	4.67	4.67
2033	4.63	4.63	4.63	4.63	4.63
2034	4.59	4.59	4.59	4.59	4.59
2035	4.55	4.55	4.55	4.55	4.55
2036	4.50	4.50	4.50	4.50	4.50
2037	4.46	4.46	4.46	4.46	4.46
2038	4.42	4.42	4.42	4.42	4.42
2039	4.38	4.38	4.38	4.38	4.38
2040	4.34	4.34	4.34	4.34	4.34
2041	4.29	4.29	4.29	4.29	4.29
2042	4.25	4.25	4.25	4.25	4.25
2043	4.21	4.21	4.21	4.21	4.21
2044	4.17	4.17	4.17	4.17	4.17
2045	4.13	4.13	4.13	4.13	4.13
2046	4.08	4.08	4.08	4.08	4.08
2047	4.04	4.04	4.04	4.04	4.04
2048+	4.00	4.00	4.00	4.00	4.00

Rationale: Initial rates are based on market assessments and surveys and take into account actual historical experience, expected unit cost information, changes in utilization, plan design leveraging, cost shifting, and new technology. The assumed ultimate trend rate and grade-down period are based on a long term projection of Gross Domestic Product (GDP) per capita.

Changes reflected in the September 30, 2025 benefit obligation

- The effective discount rate increased from 4.98% per annum to 5.30% per annum.
- The mortality improvement projection scale was updated from Scale MSS-2024 to Scale MSS-2025.
- The starting per-capita claims cost, premiums, retiree contributions, and RDS assumptions were updated to better reflect anticipated experience, taking into account actual experience over the past year, actual rates provided, and actual claims and enrollment from the RDS applications.
- The healthcare cost trend rates were updated to reflect Mercer's most up-to-date trend model.

Section 4.3: Summary of plan provisions

				Deductible				Coinsurance			Copayment					
Grid #	Class ID's	Active Retire	Medical Program	Hospital	Medical / Surgical	Major Medical (MM)	Combined	Hospital	Medical / Surgical	Major Medical	PCP	Specialist	ER	OOP Maximum (deduct. not included)	Lifetime Maximum	Prescription Drugs
3	0C03	Active	Comprehensive Catastrophic				$1,000	80%	80%	80%				$2,000	Unlimited	
4	0C04, 0C27	Active	Comprehensive (PA)				$200	80%	80%	80%				$1,000 $1,900	Unlimited	
9	0C32, 0C33	Retiree	Comprehensive (PA)				$200	80%	80%	80%				$1,000 $1,900	$1,000,000	
5	0C05, 0C28	Active	Comprehensive (NY)				$200	80%	80%	80%				$1,000 $1,900	Unlimited	
10	0C10, 0C36	Retiree	Comprehensive (NY)				$200	80%	80%	80%				$1,000 $1,900	$1,000,000	
7	0C07, 0C30	Active	Comprehensive w/RX (NY)				$200	80%	80%	80%				$1,000 $1,900	Unlimited	80% after deductible
11	0C11, 0C37	Retiree	Comprehensive w/RX (NY)				$200	80%	80%	80%				$1,000 $1,900	$1,000,000	80% after deductible
8	0C08, 0C31	Active	Comprehensive w/RX (PA)				$200	80%	80%	80%				$1,000 $1,900	Unlimited	80% after deductible
12	0C12, 0C38	Retiree	Comprehensive w/RX (PA)				$200	80%	80%	80%				$1,000 $1,900	$1,000,000	80% after deductible
10	0P10	Active	PPO (NY, TX, PA & CA)				$0 in/$250 out	100% in network / 80% out			$10 in	$10 in	$20	$1,000 out	Unlimited	
	0P28	Retiree	PPO (NY)				$0 in/$250 out	100% in network / 80% out			$10 in	$15 in	$100	$1,000 out	$2,000,000	
	0P29	Retiree	PPO (PA)				$0 in/$250 out	100% in network / 80% out			$10 in	$15 in	$100	$1,000 out	$2,000,000	
12	0T12	Active	Indemnity (NY)	$0	$0	$50		100%	100%	80%				$400 MM	Unlimited	
13	0T13	Retiree	Indemnity (NY)	$0	$0	$50		100%	100%	80%				$400 MM	$1,000,000 MM	
15	0T15	Active	Indemnity (PA)	$0	$0	$100		100%	100%	80%				$400 MM	Unlimited	
16	0T16	Active	Executive	$0	$0	$0		100%	100%	100%				n/a	Unlimited	
17	0T17	Retiree	Indemnity (PA)	$0	$0	$100		100%	100%	80%				$400 MM	$1,250,000 MM	
27	0T27	Retiree	Executive	$0	$0	$0		100%	100%	100%				n/a	$1,500,000 MM / EM	

It is assumed that plans coordinate with Medicare on a carve-out basis.

"Variable Annual Rate Retirees"

Employee Group	Executives	NY Management	PA Management	Non-Union NY F/T Hourly	Non-Union PA F/T Hourly	IBEW LU 2154	IBEW LU 2154N	IBEW LU 2199 & 2199J	IBEW LU 2154P	IBEW LU 2154PN	NCFO/SEIU Chapter 22	NCFO/SEIU Chapter 22/22S
Active Benefit Eligibility Code	EXE	SPV, MDD	SPV, MDD	EXN	EXP	UPN	USR	UCN, UFE	UPP, UPR	SPR	UFN, UFP, UFQ, UFR	SFN, SFP
Retiree Benefit Eligibility Code	REX	R01	R02	R03	R04	R05	R06	R07	R08	R09	R10	R11
New Entrants	National Fuel Gas Company's postretirement medical and life insurance benefits plan was closed to new entrants at various dates in 2002 and 2003 for each employee group. The closed group is generally made up of "Variable Annual Rate Retirees and Future Retirees", "Post 2001 Grandfathered Retirees", and "Pre 2001 Grandfathered Retirees". Active employees who are in the closed group and therefore eligible for postretirement medical and life insurance benefits upon retirement must also meet the eligibility requirement below in order to receive benefits.											
Eligibility	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled	12 years of service at age 55, or age 50 if disabled	10 years of service at age 55, or age 50 if disabled
Retirement Date for "Variable Rate" Retirees	**N/A**	NYD, Supply: On or after 1/1/2008	PAD, Supply: On or after 1/1/2008	NYD, Supply: On or after 1/1/2008	PAD, Supply: On or after 1/1/2008	NYD, Supply: On or after 3/1/2008	NYD, Supply: On or after 3/1/2008	NYD, Supply: On or after 3/1/2008	PAD, Supply: On or after 5/1/2009	PAD, Supply: On or after 5/1/2009	PAD, Supply: On or after 6/1/2009	PAD, Supply: On or after 6/1/2009
Prescription Drug Plan	3-tier plan	3-tier plan	3-tier plan	3-tier plan	3-tier plan	3-tier plan	Included with medical plan if comprehensive elected	3-tier plan	3-tier plan	Included with medical plan if comprehensive elected	3-tier plan	Included with medical plan if comprehensive elected
Basic Life Insurance at Retirement	By individual	$15,000 max (50% of pay at time of retirement)	$15,000 max (50% of pay at time of retirement)	$7,500 reduction schedule 2	$5,000 reduction schedule 1	$7,500 reduction schedule 2	$7,500 reduction schedule 2	$7,500 reduction schedule 2	$5,000 reduction schedule 1	$5,000 reduction schedule 1	$5,000 reduction schedule 1	$5,000 reduction schedule 1
Supplemental Life Insurance at Retirement (if elected)	By individual	$10,000 max, ending at age 70 (50% of supplemental amount at time of retirement)	$10,000 max, ending at age 70 (50% of supplemental amount at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	None	None	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)
Medicare Part B Reimbursement (at the standard premium)	If disabled prior to age 65	If disabled prior to age 65	If disabled prior to age 65	If disabled prior to age 65	If disabled prior to age 65	Eligible	Eligible	If disabled prior to age 65	Eligible	Eligible	Eligible	Eligible
Surviving Spouse Benefit	Lifetime	Lifetime	Lifetime	Lifetime	Lifetime	Lifetime	Lifetime	Lifetime	36 months	36 months	Lifetime	Lifetime
Surviving Spouse Contribution	Based on retiree healthcare plan rates	Based on retiree healthcare plan rates	Based on retiree healthcare plan rates	Based on retiree healthcare plan rates	Based on retiree healthcare plan rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on retiree healthcare plan rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates

"Post 2001 Grandfathered Retirees"

Employee Group	Executives	Non-Union SRC Management	Non-Union NY Management	Non-Union PA Management	Non-Union NY F/T Hourly	Non-Union PA F/T Hourly	IBEW LU 2154	IBEW LU 2154N	IBEW LU 2199 & 2199J	IBEW LU 2154P	IBEW LU 2154PN	NCFO/SEIU Chapter 22	NCFO/SEIU Chapter 22/22S
Retiree Benefit Eligibility Code	REX RNY or RPA after 18 months	NHB	RNY	RPA	RNY	RPA	RNY	RNY	RNY	RPA	RPA	RPA	RPA
Retirement Date Closed to "Grandfathered" Retirees	N/A	N/A	1/1/2008	1/1/2008	1/1/2008	1/1/2008	3/1/2008	3/1/2008	3/1/2008	5/1/2009	5/1/2009	6/1/2009	6/1/2009
Prescription Drug Plan	$5/$10 Plan or Core Plan	N/A	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	Included with medical plan if comprehensive elected	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	Included with medical plan if comprehensive elected	$5/$10 Plan or Core Plan	Included with medical plan if comprehensive elected
Basic Life Insurance at Retirement	By individual	$15,000 max (50% of active rate at time of retirement)	$15,000 max (50% of active rate at time of retirement)	$15,000 max (50% of active rate at time of retirement)	$7,500 reduction schedule 2	$5,000 reduction schedule 1	$7,500 reduction schedule 2	$7,500 reduction schedule 2	$7,500 reduction schedule 2	$5,000 reduction schedule 1	$5,000 reduction schedule 1	$5,000 reduction schedule 1	$5,000 reduction schedule 1
Supplemental Life Insurance at Retirement (if elected)	By individual	$10,000 max, ending at age 70 (50% of supp amount at time of retirement)	$10,000 max, ending at age 70 (50% of supp amount at time of retirement)	$10,000 max, ending at age 70 (50% of supp amount at time of retirement)	$10,000 max, ending at age 70 (50% of supp amount at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	None	None	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)
Medicare Part B Reimbursement (at the standard premium)	If disabled prior to age 65	N/A	If disabled prior to age 65	If disabled prior to age 65	If disabled prior to age 65	If disabled prior to age 65	Eligible	Eligible	If disabled prior to age 65	Eligible	Eligible	Eligible	Eligible
Surviving Spouse Benefit	Lifetime	N/A	Lifetime	Lifetime	Lifetime	Lifetime	Lifetime	Lifetime	Lifetime	36 months	36 months	Lifetime	Lifetime
Surviving Spouse Contribution	By individual	N/A	Based on historical retiree rates	Based on historical retiree rates	Based on historical retiree rates	Based on historical retiree rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on historical retiree rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates

"Pre 2001 Grandfathered Retirees"

Employee Group	Executives	Non-Union SRC Management	Non-Union NY Management	Non-Union PA Management	Non-Union NY F/T Hourly	Non-Union PA F/T Hourly	IBEW LU 2154	IBEW LU 2154N	IBEW LU 2199 & 2199J	IBEW LU 2154P	IBEW LU 2154PN	NCFO/SEIU Chapter 22	NCFO/SEIU Chapter 22/22S
Retiree Benefit Eligibility Code	REX RNY or RPA after 18 months	NHB	RNY	RPA	RNY	RPA	RNY	RNY	RNY	RPA	RPA	RPA	RPA
Retirement Date Closed to "Grandfathered" Retirees	1/1/2001	N/A	1/1/2001	1/1/2001	1/1/2001	1/1/2001	1/1/2001	1/1/2001	1/1/2001	1/1/2001	1/1/2001	1/1/2001	1/1/2001
Prescription Drug Plan	$5/$10 Plan or Core Plan	N/A	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	Included with medical plan if comprehensive elected	$5/$10 Plan or Core Plan	$5/$10 Plan or Core Plan	Included with medical plan if comprehensive elected	$5/$10 Plan or Core Plan	Included with medical plan if comprehensive elected
Basic Life Insurance at Retirement	By individual	$15,000 maximum (50% of active rate at time of retirement)	$15,000 maximum (50% of active rate at time of retirement)	$15,000 maximum (50% of active rate at time of retirement)	$7,500 reduction schedule 2	$5,000 reduction schedule 1	$7,500 reduction schedule 2	$7,500 reduction schedule 2	$7,500 reduction schedule 2	$5,000 reduction schedule 1	$5,000 reduction schedule 1	$5,000 reduction schedule 1	$5,000 reduction schedule 1
Supplemental Life Insurance at Retirement (if elected)	By individual	$10,000 max, ending at age 70 (50% of supp rate at time of retirement)	$35,000 max, ending at age 70 (50% of active rate at time of retirement)	$35,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of supp amount at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	None	None	$10,000 max, ending at age 70 (50% of active rate at time of retirement)	$10,000 max, ending at age 70 (50% of active rate at time of retirement)
Medicare Part B Reimbursement (at the standard premium)	Eligible	N/A	Eligible	Eligible	Eligible	Eligible	Eligible	Eligible	Eligible	Eligible	Eligible	Eligible	Eligible
Surviving Spouse Benefit	Lifetime	N/A	Lifetime	36 months	Lifetime	36 months	Lifetime	Lifetime	Lifetime	36 months	36 months	Lifetime	Lifetime
Surviving Spouse Contribution	Based on survinving spouse COBRA rates	N/A	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates	Based on surviving spouse COBRA rates

Additional Plan Details:

Prescription Drug Plan

Retiree copayments in the Core Plan are $0/$1 (generic/brand).
Retiree copayments in the $5/$10 Plan are $5/$10 (generic/brand).
Retiree copayments in the 3-tier Plan are $12.50/$24/$40 (generic/brand/specialty).

Basic Life Insurance Plan

Retirement Reduction Schedule 1
(Pennsylvania - Union & Non-Union Hourly)

60 & under	$12,500
61	$11,500
62	$10,500
63	$9,500
64	$8,500
65-69	$7,500
70 & over	$5,000

Retirement Reduction Schedule 2
(New York - Union & Non-Union Hourly)

60 & under	$12,500
61	$11,500
62	$10,500
63	$9,500
64	$8,500
65 & over	$7,500

Section 4.4: Claims cost development and medical rate information

Claim cost development

The claim costs were developed using the aggregate claims experience, separately for pre-65 and post-65 retirees, for the 36-month period ending December 2024 (for the 2025 disclosure) and December 2023 (for the 2024 disclosure and 2025 NPPBC) adjusted for the relative plan value, trend, and demographics of each individual plan. The prescription drug claim cost was also adjusted to reflect historical drug rebate information provided by National Fuel Gas Company. The pre-65 retiree experience was given credibility of 69% and the post-65 retiree experience was given full credibility.

Note, the medical plans described under grids 7, 8, 11, and 12 include prescription drug coverage. For valuation purposes, the prescription drug portion of the cost of these plans was valued separately. Since the prescription drug claims for plans under these grids were unavailable, this claim cost was developed by applying a relative value factor determined using actuarial equivalent rate relationships to the $5/$10 copayment plan claim cost.

Summary of premium rates for community rated plans

	Monthly premiums	
	2025	2024
Under 65 Rates (Independent Health FlexFit)		
Single, with Caremark	per Rx plan	per Rx plan
Single, w/o Caremark	$635.76	$582.62
Family, with Caremark	per Rx plan	per Rx plan
Family, w/o Caremark	1,716.54	1,573.08
Over 65 Rates (Independent Health Encompass 65)		
Single over	$240.00	$233.00
Two person over	480.00	466.00
One under/one over	875.76	815.62
Family, 1/more over	1,956.54	1,806.08

Retiree healthcare plan rates as of 1/1/2025

Below is a summary of the monthly retiree healthcare contribution amounts for those who retire after the 2008/2009 plan changes. For such retirees, the rates are assumed to change with healthcare trend throughout retirement, as described in Section 4.2. The contribution amounts shown are for medical and prescription drug coverage. For valuation purposes, they are allocated between medical and drug as described in Section 4.2.

Non-Medicare primary (pre-65)

Employee Group	Non-Union	IBEW LU 2154	IBEW LU 2154N	IBEW LU 2199 & 2199J	IBEW LU 2154P	IBEW LU 2154PN	NCFO/SEIU Chapter 22/22S	NCFO/SEIU Chapter 22/22S
Retiree Contribution Changes	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025
Active Benefit Eligibility Code	SPV, EXN, EXP	UPN	USR	UCN, UFE	UPP, UPR	SPR	UFN, UFP, UFQ, UFR	SFN, SFP
Retiree Benefit Eligibility Code	R01, R02, R03, R04	R05	R06	R07	R08	R09	R10	R11
SINGLE COVERAGE								
Indemnity	178.00	231.20	N/A	231.20	231.20	N/A	231.20	N/A
Comprehensive	157.40	N/A	N/A	N/A	204.50	N/A	204.50	N/A
Comprehensive w/RX	N/A	N/A	180.20	N/A	N/A	180.20	N/A	180.20
PPO	167.00	217.00	155.50	217.00	217.00	155.50	217.00	N/A
IHA FlexFit	169.70	220.40	158.90	220.40	N/A	N/A	N/A	N/A
FAMILY COVERAGE								
Indemnity	483.30	627.70	N/A	627.70	627.70	N/A	627.70	N/A
Comprehensive	426.70	N/A	N/A	N/A	554.20	N/A	554.20	N/A
Comprehensive w/RX	N/A	N/A	459.20	N/A	N/A	459.20	N/A	459.20
PPO	453.20	588.70	421.00	588.70	588.70	421.00	588.70	N/A
IHA FlexFit	459.60	596.80	429.10	596.80	N/A	N/A	N/A	N/A

Retiree healthcare plan rates as of 1/1/2025 (continued)

Medicare primary (post-65)

Employee Group	Non-Union	IBEW LU 2154	IBEW LU 2154N	IBEW LU 2199 & 2199J	IBEW LU 2154P	IBEW LU 2154PN	NCFO/SEIU Chapter 22/22S	NCFO/SEIU Chapter 22/22S
Retiree Contribution Changes	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025	1/1/2025
Active Benefit Eligibility Code	SPV, EXN, EXP	UPN	USR	UCN, UFE	UPP, UPR	SPR	UFN, UFP, UFQ, UFR	SFN, SFP
Retiree Benefit Eligibility Code	R01, R02, R03, R04	R05	R06	R07	R08	R09	R10	R11
SINGLE COVERAGE								
Indemnity	150.30	195.20	N/A	195.20	195.20	N/A	195.20	N/A
Comprehensive	144.90	N/A	N/A	N/A	188.20	N/A	188.20	N/A
Comprehensive w/RX	N/A	N/A	105.50	N/A	N/A	105.50	N/A	105.50
PPO	145.90	189.50	62.00	189.50	189.50	62.00	189.50	N/A
IHA Encompass 65	144.30	187.50	60.00	187.50	N/A	N/A	N/A	N/A
Forever Blue, In-Area	126.40	164.20	N/A	164.20	N/A	N/A	N/A	N/A
Forever Blue, Out-of-Area	139.30	181.00	N/A	181.00	181.00	N/A	181.00	N/A
FAMILY COVERAGE								
Indemnity	301.80	392.00	N/A	392.00	392.00	N/A	392.00	N/A
Comprehensive	287.40	N/A	N/A	N/A	373.20	N/A	373.20	N/A
Comprehensive w/RX	N/A	N/A	210.70	N/A	N/A	210.70	N/A	210.70
PPO	291.20	378.20	122.00	378.20	378.20	122.00	378.20	N/A
IHA Encompass 65	289.70	376.20	120.00	376.20	N/A	N/A	N/A	N/A
Forever Blue, In-Area	253.90	329.70	N/A	329.70	N/A	N/A	N/A	N/A
Forever Blue, Out-of-Area	279.70	363.20	N/A	363.20	363.20	N/A	363.20	N/A

Summary of historical retiree healthcare plan rates

Below is a summary of the monthly retiree healthcare contribution amounts for those who retired prior to the 2008/2009 plan changes. For such retirees there is no additional contribution for spousal/dependent coverage and the contribution amount determined at retirement does not change with healthcare trend or Medicare status. Further, the whole contribution is allocated to medical coverage.

Blue Cross/Blue Shield Plan	Monthly Contribution	Effective Date
1. Participants who retired prior to 1/1/1991	$0.00	N/A
2. Participants who retired 1/1/1991 - 2/29/2008:		
a) Comprehensive 80/20 Plan[1]	$0.00	N/A
b) Locals 2154, 2199, and 2199J IBEW (NY)	$21.66	2/17/1991
Hired on/before 4/13/1996	$26.00	2/16/1992
	$30.33	2/16/1993
	$34.66	2/13/1994
	$39.00	2/11/1996
	$39.00	thru 2/14/2008
c) Local 2154P (formerly Local 2279 IBEW) (PA)[2]	$21.66	4/13/1991
Hired on/before 4/13/1996, retired prior to 5/1/2009 and selected Indemnity Plan (Note: retirees that selected the PPO Plan have no monthly contributions).	$22.53	4/13/1992
	$28.16	4/13/1993
	$28.16	4/13/1994
	$28.16	4/13/1995
	$34.58	6/1/1996
	$44.29	6/1/1997
	$50.40	7/1/1998
	$63.14	4/13/2002
	$70.46	4/13/2003
	$68.00	1/1/2004
	$71.00	4/13/2005
	$88.00	4/10/2006
	$113.00	1/1/2007
	$117.05	1/1/2008
	$117.05	thru 5/1/2009
d) NCFO/SEIU, Chapter 22	$11.91	5/1/1991
Hired on/before 5/1/1996	$21.66	5/1/1992
	$28.16	5/1/1993
	$34.66	5/1/1994
	$39.00	5/1/1995
	$43.33	5/1/1999
	$47.66	5/1/2000
	$52.00	5/1/2001
	$52.00	thru 5/1/2009

[1] Amount applies to union and non-union retirees in the comprehensive plan.

[2] If the company cost increases over 5%, the percentage above 5% will be shared jointly 50/50 between the employee and the Company.

Summary of historical retiree healthcare plan rates (continued)

Blue Cross/Blue Shield Plan		Monthly Contribution	Effective Date
e)	Non-Union Non-Supervisory Employees	$21.66	7/1/1991
	Hired on/before 6/1/2003	$26.00	1/1/1993
		$28.16	11/1/1993
		$32.50	1/1/1995
		$36.83	1/1/1997
		$47.97	1/1/2000
		$51.00	1/1/2001
		$56.00	1/1/2002
		$61.00	1/1/2003
		$68.00	1/1/2004
		$71.00	1/1/2005
		$88.00	1/1/2006
		$120.00	1/1/2007
		$120.00	thru 1/1/2008
f)	Supervisory/Excluded, Executive employees and Seneca Resources, not in POS plan	10% of benefit at retirement	
	Hired on/before 6/1/2003	$28.00	1/1/1991
		$30.00	1/1/1992
		$33.00	1/1/1993
		$37.00	1/1/1994
		$37.00	1/1/1995
		$33.00	1/1/1996
		$37.00	1/1/1997
		$42.00	1/1/1999
		$48.00	1/1/2000
		$51.00	1/1/2001
		$56.00	1/1/2002
		$61.00	1/1/2003
		$68.00	1/1/2004
		$71.00	1/1/2005
		$88.00	1/1/2006
		$120.00	1/1/2007
		$120.00	thru 1/1/2008
g)	Supervisory/Excluded, Executive employees, in POS plan	$56.00	1/1/2002
	Hired prior to 6/1/2003	$61.00	1/1/2003
		$68.00	1/1/2004
		$71.00	1/1/2005
		$88.00	1/1/2006
		$120.00	1/1/2007
		$120.00	thru 1/1/2008

Summary of historical retiree healthcare plan rates (continued)

Retirees under age 65 who participate in a community rated plan pay the contribution amount identified earlier in this section– based on the group they are in – plus an active differential. Retirees who are age 65 and over and participate in a community rated plan pay only the amount identified earlier in this section.

The monthly active differentials for 1991 through 2025 are as follows:

Year of Retirement	Independent Health	
	Single	Family
1991	$4.48	$9.36
1992	$5.40	$11.76
1993	$5.01	$11.05
1994	$0.00	$0.00
1995	$2.40	$2.88
1996	$11.12	$25.60
1997	$0.00	$0.00
1998	$0.00	$0.00
1999	$0.00	$29.92
2000	$0.00	$0.00
2001	$3.92	$45.64
2002	$0.00	$41.40
2003 - 2025	$0.00	$0.00

Surviving spouse contribution rates

If a participant retires on or after 1/1/2001 and is either 1) management, 2) non-union hourly, 3) union division 2199, or 4) union division 2199-J, then the surviving spouse contribution upon that retiree's death is the same amount that the retiree was contributing. For all other retirees, the surviving spouse contribution is as shown in this section.

Carrier & Plan Names	2024		2025	
	Single	Family	Single	Family
BlueCross BlueShield of Western New York				
Indemnity (Traditional)				
Non Medicare Primary (Under 65)	$840.00	$2,090.00	$998.00	$2,480.00
Medicare Primary (Over 65)	$232.00	$464.00	$271.00	$543.00
Comprehensive 80/20				
Non Medicare Primary (Under 65)	$445.00	$1,216.00	$529.00	$1,443.00
Medicare Primary (Over 65)	$208.00	$400.00	$243.00	$468.00
Comprehensive 80/20 with Rx				
Non Medicare Primary (Under 65)	$607.00	$1,548.00	$721.00	$1,837.00
Medicare Primary (Over 65)	$361.00	$720.00	$422.00	$843.00
PPO Plan				
Non Medicare Primary (Under 65)	$645.00	$1,779.00	$766.00	$2,111.00
Medicare Primary (Over 65)	$212.00	$417.00	$248.00	$488.00
Executives (includes BCBSWNY Indemnity)				
Under and Over 65	$744.00	$2,018.00	$801.00	$2,173.00
Independent Health				
FlexFit				
Non Medicare Primary (Under 65)	$582.62	$1,573.08	$635.76	$1,716.54
Encompass 65				
Medicare Primary (Over 65)	$233.00	$466.00	$240.00	$480.00
Forever Blue PPO 799 (Over 65)				
In-Area	$137.00	$274.00	$147.00	$294.00
Out-of-Area	$200.00	$400.00	$214.00	$428.00
CVS Caremark Prescription Drug:				
$0/$1 Core Plan	$586.00	$1,179.00	$682.00	$1,373.00
$5/$10 Core Plan	$564.00	$1,131.00	$656.00	$1,317.00
3-Tier Plan ($12.50/$24.00/$40.00 Copays)	$438.00	$881.00	$510.00	$1,025.00

Appendices

Appendix A These exhibits summarize the net periodic postretirement benefit cost for the fiscal year ending September 30, 2025 by division and employment status (bargaining and non-bargaining).

Appendix B These exhibits summarize the reconciliation of funded status for the fiscal year ending September 30, 2025 by division and employment status (bargaining and non-bargaining).

Appendix A: NPPBC for fiscal year ending September 30, 2025

	New York Distribution	Pennsylvania Distribution	Supply	SRC	Parent	Empire Pipeline	Midstream	Total
Collectively Bargained Employees								
1. Service Cost	189,663	7,034	94,999	0	0	0	0	291,696
2. Interest Cost[1]								
a. Beginning of year APBO	115,604,120	31,289,817	43,462,456	0	0	0	0	190,356,393
b. Weighted benefit payments	4,797,288	1,287,475	1,627,032	0	0	0	0	7,711,795
c. Average APBO = a. - b.	110,806,832	30,002,342	41,835,424	0	0	0	0	182,644,598
d. Discount rate	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%
e. Interest cost = c. x d.	5,200,030	1,407,974	1,963,286	0	0	0	0	8,571,290
3. Expected Return on Assets								
a. Beginning of year assets	191,499,183	62,007,691	61,812,613	0	0	0	0	315,319,487
b. Weighted benefit payments	4,797,288	1,287,475	1,627,032	0	0	0	0	7,711,795
c. Weighted contributions	0	0	0	0	0	0	0	0
d. Average assets = a. - b. + c.	186,701,895	60,720,216	60,185,581	0	0	0	0	307,607,692
e. Rate of return	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%
f. Expected return = d. x e.	10,081,902	3,278,892	3,250,021	0	0	0	0	16,610,815
4. Amortizations								
a. Transition (asset) / obligation	0	0	0	0	0	0	0	0
b. Prior service (credit) / cost	(184,312)	(49,131)	(66,795)	0	0	0	0	(300,238)
c. (Gains) / losses								
Corridor		0	0	0	0	0	0	0
Vintage 1	1,201,693							
Vintage 2	2,603,605							
Vintage 3	(2,982,108)							
Vintage 4	(545,455)							
Vintage 5	1,281,986							
Vintage 6	(254,407)							
Vintage 7	(2,751,644)							
Vintage 8	605,825							
Vintage 9	(673,954)							
Vintage 10	140,538							
Vintage Total	(1,373,921)							(1,373,921)
d. Total amortizations	(1,558,233)	(49,131)	(66,795)	0	0	0	0	(1,674,159)
5. Net Postretirement Benefit Cost / (Income) = 1. + 2.e. - 3.f. + 4.d.	**(6,250,442)**	**(1,913,015)**	**(1,258,531)**	**0**	**0**	**0**	**0**	**(9,421,988)**

[1] The Interest Cost is determined using a spot-rate approach by applying the specific rates along the Above Mean Mercer Yield Curve to the relevant cash flows. The calculation presented here shows the application of the resulting effective rate for interest applied to the APBO (adjusted for expected benefit payments), which yields the same result. Although the effective rate for interest on the APBO is shown to two decimal places, the actual rate is unrounded.

Appendix A: NPPBC for fiscal year ending September 30, 2025

	New York Distribution	Pennsylvania Distribution	Supply	SRC	Parent	Empire Pipeline	Midstream	Total
Non-Collectively Bargained Employees								
1. Service Cost	143,711	22,983	52,364	475	0	0	7,752	227,285
2. Interest Cost[1]								
a. Beginning of year APBO	63,156,676	26,584,683	37,416,002	1,712,928	1,614,830	0	183,354	130,668,473
b. Weighted benefit payments	2,098,344	884,236	1,215,598	53,282	56,796	0	0	4,308,256
c. Average APBO = a. - b.	61,058,332	25,700,447	36,200,404	1,659,646	1,558,034	0	183,354	126,360,217
d. Discount rate	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%
e. Interest cost = c. x d.	2,865,393	1,206,091	1,698,841	77,885	73,117	0	8,604	5,929,931
3. Expected Return on Assets								
a. Beginning of year assets	89,026,611	44,306,884	47,411,817	0	0	0	0	180,745,312
b. Weighted benefit payments	2,098,344	884,236	1,215,598	53,282	56,796	0	0	4,308,256
c. Weighted contributions	0	0	0	53,282	56,796	0	0	110,078
d. Average assets = a. - b. + c.	86,928,267	43,422,648	46,196,219	0	0	0	0	176,547,134
e. Rate of return	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%
f. Expected return = d. x e.	4,694,126	2,344,823	2,494,596	0	0	0	0	9,533,545
4. Amortizations								
a. Transition (asset) / obligation	0	0	0	0	0	0	0	0
b. Prior service (credit) / cost	(67,680)	(23,496)	(34,646)	(2,311)	(318)	0	0	(128,451)
c. (Gains) / losses								
Corridor		846,123	324,628	(20,188)	(65,088)	(1,900)	(58,331)	1,025,244
Vintage 1	628,665							
Vintage 2	1,265,581							
Vintage 3	(1,350,991)							
Vintage 4	(253,163)							
Vintage 5	892,053							
Vintage 6	110,074							
Vintage 7	(1,267,259)							
Vintage 8	(410,172)							
Vintage 9	53,910							
Vintage 10	716,991							
Vintage Total	385,689							385,689
d. Total amortizations	318,009	822,627	289,982	(22,499)	(65,406)	(1,900)	(58,331)	1,282,482
5. Net Postretirement Benefit Cost / (Income) = 1. + 2.e. - 3.f. + 4.d.	**(1,367,013)**	**(293,122)**	**(453,409)**	**55,861**	**7,711**	**(1,900)**	**(41,975)**	**(2,093,847)**

[1] The Interest Cost is determined using a spot-rate approach by applying the specific rates along the Above Mean Mercer Yield Curve to the relevant cash flows. The calculation presented here shows the application of the resulting effective rate for interest applied to the APBO (adjusted for expected benefit payments), which yields the same result. Although the effective rate for interest on the APBO is shown to two decimal places, the actual rate is unrounded.

Appendix A: NPPBC for fiscal year ending September 30, 2025

	New York Distribution	Pennsylvania Distribution	Supply	SRC	Parent	Empire Pipeline	Midstream	Total
All Employees								
1. Service Cost	333,374	30,017	147,363	475	0	0	7,752	518,981
2. Interest Cost[1]								
a. Beginning of year APBO	178,760,796	57,874,500	80,878,458	1,712,928	1,614,830	0	183,354	321,024,866
b. Weighted benefit payments	6,895,632	2,171,711	2,842,630	53,282	56,796	0	0	12,020,051
c. Average APBO = a. - b.	171,865,164	55,702,789	78,035,828	1,659,646	1,558,034	0	183,354	309,004,815
d. Discount rate	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%	4.69%
e. Interest cost = c. x d.	8,065,423	2,614,065	3,662,127	77,885	73,117	0	8,604	14,501,221
3. Expected Return on Assets								
a. Beginning of year assets	280,525,794	106,314,575	109,224,430	0	0	0	0	496,064,799
b. Weighted benefit payments	6,895,632	2,171,711	2,842,630	53,282	56,796	0	0	12,020,051
c. Weighted contributions	0	0	0	53,282	56,796	0	0	110,078
d. Average assets = a. - b. + c.	273,630,162	104,142,864	106,381,800	0	0	0	0	484,154,826
e. Rate of return	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%	5.40%
f. Expected return = d. x e.	14,776,028	5,623,715	5,744,617	0	0	0	0	26,144,360
4. Amortizations								
a. Transition (asset) / obligation	0	0	0	0	0	0	0	0
b. Prior service (credit) / cost	(251,992)	(72,627)	(101,441)	(2,311)	(318)	0	0	(428,689)
c. (Gains) / losses								
Corridor		846,123	324,628	(20,188)	(65,088)	(1,900)	(58,331)	1,025,244
Vintage 1	1,830,358							
Vintage 2	3,869,186							
Vintage 3	(4,333,099)							
Vintage 4	(798,618)							
Vintage 5	2,174,039							
Vintage 6	(144,333)							
Vintage 7	(4,018,903)							
Vintage 8	195,653							
Vintage 9	(620,044)							
Vintage 10	857,529							
Vintage Total	(988,232)							(988,232)
d. Total amortizations	(1,240,224)	773,496	223,187	(22,499)	(65,406)	(1,900)	(58,331)	(391,677)
5. Net Postretirement Benefit Cost / (Income) = 1. + 2.e. - 3.f. + 4.d.	**(7,617,455)**	**(2,206,137)**	**(1,711,940)**	**55,861**	**7,711**	**(1,900)**	**(41,975)**	**(11,515,835)**

[1] The Interest Cost is determined using a spot-rate approach by applying the specific rates along the Above Mean Mercer Yield Curve to the relevant cash flows. The calculation presented here shows the application of the resulting effective rate for interest applied to the APBO (adjusted for expected benefit payments), which yields the same result. Although the effective rate for interest on the APBO is shown to two decimal places, the actual rate is unrounded.

Appendix B: Reconciliation of funded status as of September 30, 2025

	New York Distribution	Pennsylvania Distribution	Supply	SRC	Parent	Empire Pipeline	Midstream	Total
Collectively Bargained Employees								
1. Accumulated Postretirement Benefit Obligation (APBO)								
a. Inactives	105,512,620	31,203,011	39,539,722	0	0	0	0	176,255,353
b. Actives fully eligible	6,879,679	1,235,317	4,004,651	0	0	0	0	12,119,647
c. Actives not fully eligible	4,417,430	280,448	2,072,969	0	0	0	0	6,770,847
d. Total APBO	116,809,729	32,718,776	45,617,342	0	0	0	0	195,145,847
2. Fair Value of Assets	192,134,828	63,389,292	62,327,383	0	0	0	0	317,851,503
3. Funded Status = 2. - 1d.	**75,325,099**	**30,670,516**	**16,710,041**	**0**	**0**	**0**	**0**	**122,705,656**
4. Unrecog Transition (Asset)/Obligation	0	0	0	0	0	0	0	0
5. Unrecog Prior Service (Credit)/Cost	(110,585)	(29,485)	(40,066)	0	0	0	0	(180,136)
6. Unrecog (Gains)/Losses								
Corridor		7,116,782	4,637,079	0	0	0	0	11,753,861
Vintage 1	2,603,606							
Vintage 2	(5,964,217)							
Vintage 3	(1,636,361)							
Vintage 4	5,127,945							
Vintage 5	(1,272,033)							
Vintage 6	(16,509,863)							
Vintage 7	4,240,777							
Vintage 8	(5,391,634)							
Vintage 9	1,264,841							
Vintage 10	4,599,082							
Vintage Total	(12,937,857)							(12,937,857)
7. Accumulated other comprehensive income (AOCI) [- (4. + 5. + 6.)]	**13,048,442**	**(7,087,297)**	**(4,597,013)**	**0**	**0**	**0**	**0**	**1,364,132**
8. Cumulative employer contributions in excess of net periodic benefit cost (3. - 7.)	62,276,657	37,757,813	21,307,054	0	0	0	0	121,341,524
9. Net amount recognized in statement of financial position (7. + 8.)	**75,325,099**	**30,670,516**	**16,710,041**	**0**	**0**	**0**	**0**	**122,705,656**
Amounts recognized in the statement of financial position consist of								
Noncurrent assets	75,325,099	30,670,516	16,710,041	0	0	0	0	122,705,656
Current liabilities	0	0	0	0	0	0	0	0
Noncurrent liabilities	0	0	0	0	0	0	0	0
Net amount recognized at year end	**75,325,099**	**30,670,516**	**16,710,041**	**0**	**0**	**0**	**0**	**122,705,656**

Appendix B: Reconciliation of funded status as of September 30, 2025

	New York Distribution	Pennsylvania Distribution	Supply	SRC	Parent	Empire Pipeline	Midstream	Total
Non-Collectively Bargained Employees								
1. Accumulated Postretirement Benefit Obligation (APBO)								
a. Inactives	51,303,052	22,511,928	30,713,516	1,458,636	1,734,452	0	0	107,721,584
b. Actives fully eligible	10,633,405	4,362,488	7,311,542	291,922	0	0	0	22,599,357
c. Actives not fully eligible	3,547,199	222,922	1,126,111	12,515	0	0	208,172	5,116,919
d. Total APBO	65,483,656	27,097,338	39,151,169	1,763,073	1,734,452	0	208,172	135,437,860
2. Fair Value of Assets	88,142,257	43,292,892	46,818,928	0	0	0	0	178,254,077
3. Funded Status = 2. - 1d.	**22,658,601**	**16,195,554**	**7,667,759**	**(1,763,073)**	**(1,734,452)**	**0**	**(208,172)**	**42,816,217**
4. Unrecog Transition (Asset)/Obligation	0	0	0	0	0	0	0	0
5. Unrecog Prior Service (Credit)/Cost	(40,614)	(14,092)	(20,791)	(1,391)	(186)	0	0	(77,074)
6. Unrecog (Gains)/Losses								
Corridor		9,571,623	8,689,311	(212,068)	(205,478)	(5,812)	(188,368)	17,649,208
Vintage 1	1,265,576							
Vintage 2	(2,701,977)							
Vintage 3	(759,493)							
Vintage 4	3,568,210							
Vintage 5	550,371							
Vintage 6	(7,603,554)							
Vintage 7	(2,871,207)							
Vintage 8	431,279							
Vintage 9	6,452,919							
Vintage 10	5,015,850							
Vintage Total	3,347,974							3,347,974
7. Accumulated other comprehensive income (AOCI) [- (4. + 5. + 6.)]	**(3,307,360)**	**(9,557,531)**	**(8,668,520)**	**213,459**	**205,664**	**5,812**	**188,368**	**(20,920,108)**
8. Cumulative employer contributions in excess of net periodic benefit cost (3. - 7.)	25,965,961	25,753,085	16,336,279	(1,976,532)	(1,940,116)	(5,812)	(396,540)	63,736,325
9. Net amount recognized in statement of financial position (7. + 8.)	**22,658,601**	**16,195,554**	**7,667,759**	**(1,763,073)**	**(1,734,452)**	**0**	**(208,172)**	**42,816,217**
Amounts recognized in the statement of financial position consist of								
Noncurrent assets	22,658,601	16,195,554	7,667,759	0	0	0	0	46,521,914
Current liabilities	0	0	0	(112,080)	(112,368)	0	(4)	(224,452)
Noncurrent liabilities	0	0	0	(1,650,993)	(1,622,084)	0	(208,168)	(3,481,245)
Net amount recognized at year end	**22,658,601**	**16,195,554**	**7,667,759**	**(1,763,073)**	**(1,734,452)**	**0**	**(208,172)**	**42,816,217**

Appendix B: Reconciliation of funded status as of September 30, 2025

	New York Distribution	Pennsylvania Distribution	Supply	SRC	Parent	Empire Pipeline	Midstream	Total
All Employees								
1. Accumulated Postretirement Benefit Obligation (APBO)								
a. Inactives	156,815,672	53,714,939	70,253,238	1,458,636	1,734,452	0	0	283,976,937
b. Actives fully eligible	17,513,084	5,597,805	11,316,193	291,922	0	0	0	34,719,004
c. Actives not fully eligible	7,964,629	503,370	3,199,080	12,515	0	0	208,172	11,887,766
d. Total APBO	182,293,385	59,816,114	84,768,511	1,763,073	1,734,452	0	208,172	330,583,707
2. Fair Value of Assets	280,277,085	106,682,184	109,146,311	0	0	0	0	496,105,580
3. Funded Status = 2. - 1d.	**97,983,700**	**46,866,070**	**24,377,800**	**(1,763,073)**	**(1,734,452)**	**0**	**(208,172)**	**165,521,873**
4. Unrecog Transition (Asset)/Obligation	0	0	0	0	0	0	0	0
5. Unrecog Prior Service (Credit)/Cost	(151,199)	(43,577)	(60,857)	(1,391)	(186)	0	0	(257,210)
6. Unrecog (Gains)/Losses								
Corridor		16,688,405	13,326,390	(212,068)	(205,478)	(5,812)	(188,368)	29,403,069
Vintage 1	3,869,182							
Vintage 2	(8,666,194)							
Vintage 3	(2,395,854)							
Vintage 4	8,696,155							
Vintage 5	(721,662)							
Vintage 6	(24,113,417)							
Vintage 7	1,369,570							
Vintage 8	(4,960,355)							
Vintage 9	7,717,760							
Vintage 10	9,614,932							
Vintage Total	(9,589,883)							(9,589,883)
7. Accumulated other comprehensive income (AOCI) [- (4. + 5. + 6.)]	**9,741,082**	**(16,644,828)**	**(13,265,533)**	**213,459**	**205,664**	**5,812**	**188,368**	**(19,555,976)**
8. Cumulative employer contributions in excess of net periodic benefit cost (3. - 7.)	88,242,618	63,510,898	37,643,333	(1,976,532)	(1,940,116)	(5,812)	(396,540)	185,077,849
9. Net amount recognized in statement of financial position (7. + 8.)	**97,983,700**	**46,866,070**	**24,377,800**	**(1,763,073)**	**(1,734,452)**	**0**	**(208,172)**	**165,521,873**
Amounts recognized in the statement of financial position consist of								
Noncurrent assets	97,983,700	46,866,070	24,377,800	0	0	0	0	169,227,570
Current liabilities	0	0	0	(112,080)	(112,368)	0	(4)	(224,452)
Noncurrent liabilities	0	0	0	(1,650,993)	(1,622,084)	0	(208,168)	(3,481,245)
Net amount recognized at year end	**97,983,700**	**46,866,070**	**24,377,800**	**(1,763,073)**	**(1,734,452)**	**0**	**(208,172)**	**165,521,873**

Mercer (US) LLC
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A business of Marsh McLennan

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-39:

Please reconcile the historical and future test year SFAS No. 106 expense levels with the amount identified in the actuarial report.

Response:

Refer to Page 78 of 82 of the response to SDR-RR-38 (Appendix A NPPBC [Net Periodic Postretirement Benefit Cost] for fiscal year ended September 30, 2025), which shows SFAS 106 income of ($2,206,137). The Company requests zero rate recovery for OPEBs (SFAS No. 106). This is consistent with the Company's filing in Docket Nos. R-2021 3027406 and C-2021 3028654, which reduced base rates, and Docket Nos. R-2022-3035730 in which OPEB rate recovery remained at zero.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-40:

Please identify the actual or projected amounts contributed to SFAS No. 106 funds for the historic and future test years. Identify the actual or projected dates and amounts of the contributions.

Response:

In conjunction with the Company's filing in Docket Nos. R-2021-3027406 and C-2021-3028654, the Company recognized zero recovery of OPEB costs, and, as a result, ceased any funding. There were no actual or projected contributions in the historic or future test years. The Company is not pursuing any OPEB cost recovery in this proceeding.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-41:

Please explain the funding options or plans which are being used for SFAS No. 106 costs. Identify the portion of the costs which are eligible for tax preferred funding.

Response:

The Company historically contributed to Voluntary Employees' Beneficiary Association (VEBA) trusts (a collectively bargained trust and a non-collectively bargained trust) and a 401(h) account, which is part of the Company's Master Retirement Trust, to pay for other post-employment benefits (OPEBs). Funding to the collectively bargained VEBA trust and the 401(h) was eligible for a full tax deduction (i.e., tax preferred funding). Funding to the non-collectively bargained VEBA trust was eligible for a tax deduction subject to IRS rules and limitations. Also, the Company previously contributed towards a grantor trust, which is not tax preferred funding (i.e., the Company did not receive a tax deduction for funding). However, it should be noted that the Company is not seeking recovery of SFAS No. 106 costs nor is it planning on additional funding in this rate case due to OPEBs being more than fully funded.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-42:

Is the Company studying and/or anticipating any changes to its postretirement benefits offered to employees as a result of SFAS No. 106 or for other reasons? If yes, please provide such study and/or explain the anticipated change.

Response:

While the Company is always evaluating its benefit offerings, there are no changes that would result in any additional SFAS 106 costs for which the Company is seeking rate recovery in this rate case. The Company is seeking no recovery of SFAS No. 106 costs in this rate case.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-43:

Please state whether the Company has included expenses related to SFAS No. 112 in its test year claim. If so, please provide complete details and include a copy of the actuarial study.

Response:

The Company has not included any such expenses in its claim.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-44:

Please provide all documentation supporting the uncollectible accrual rate reflected in the Company's filing.

Response:

The documentation for the accrual rate can be found in the following schedules:

- FTY – National Fuel Exhibit ATF-2, Schedule 5
- FPFTY – National Fuel Exhibit ATF-3, Schedule 1

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-45:

Please provide all workpapers and documentation supporting the Company's claimed balance of gas stored underground – current. Include support for the monthly injections and withdrawals and the gas cost rate.

Response:

See pages 2 through 61 for supporting documentation.

NFG Distribution Corporation
Inventory Cost Record as Booked
October 31, 2024
F:\Accounting\SOX Secured Files\Monthly Entries NFGDC\Monthly\STORAGE\Stor25\[Stor1024.xls]calc mcf

W/S B
Product 1902

	Current Month MCF	Rate	Amount	Since October 1st MCF	Rate *	Amount
UPDATE LINKS						
Balance Beginning of Period						
New York	A 19,970,797 ✓	1.2118	A $24,200,576.02 ✓	19,970,797	$1.2118	$24,200,576.02 ✓
Pennsylvania	8,155,231 ✓	1.3200	$10,764,567.87 ✓	8,155,231	$1.3200	$10,764,567.87 ✓
	28,126,028 ✓	1.2432	$34,965,143.89 ✓	28,126,028	1.2432	$34,965,143.89 ✓
Input - New York	1,625,125 ✓	B 1.7715 ✓	2,878,908.94 ✓	1,625,125	1.7715	2,878,908.94 ✓
- Pennsylvania	833,358 ✓	5.3449 ✓	4,454,215.17 ✓	833,358	C 5.3449	4,454,215.17 ✓
Output - New York	210,332 ✓	B 1.7715 ✓	372,603.14 ✓	210,332	1.7715	372,603.14 ✓
- Pennsylvania	29,907 ✓	5.3449 ✓	159,849.92 ✓	29,907	C 5.3449	159,849.92 ✓
Net - New York	1,414,793 ✓	1.7715	$ 2,506,305.80	1,414,793	1.7715	$ 2,506,305.80
Net - Pennsylvania	803,451 ✓	5.3449	$ 4,294,365.25	803,451	5.3449	$ 4,294,365.25
	2,218,244	3.0658	$ 6,800,671.05	2,218,244	3.0658	$ 6,800,671.05
Loss	0	0.0000	0.00	0	0.0000	0.00
Balance End of Period to W/S C						
New York	D 21,385,590 ✓	$1.2488	$26,706,881.82 ✓	21,385,590	$1.2488	$26,706,881.82 ✓
Pennsylvania	8,958,682 ✓	$1.6809	$15,058,933.12 ✓	8,958,682	$1.6809	$15,058,933.12 ✓
TOTAL	30,344,272	$1.3764	$41,765,814.94	30,344,272	$1.3764	$41,765,814.94
* Rate per Valuation Department	21,385,590	0	0			- OK
	8,958,682	0	0			- OK

UPDATE LINKS		Note: Links neede
		Do not use links for
NY	0	0.00
PA	0	0.00

Michael Maggioli:
10/31/24- Updated with 9/30/24 balances

UPDATE FIRST MONTH OF FISCAL YEAR

Gas Stored Underground YTD (9/30/2024)

New York	19,970,797	$	1.211798	$24,200,576.02
Pennsylvania	8,155,231	$	1.319959	10,764,567.87
	28,126,028	$	1.243160	$34,965,143.89

Gas Stored Underground Current

New York	21,385,590 ✓	$ 1.2488	26,706,881.82 ✓
Pennsylvania	8,958,682 ✓	$ 1.6809	15,058,933.12 ✓
	30,344,272	$1.3764	$41,765,814.94

Balance Sheet Presentation

Gas Stored Underground Current (LIFO)				
New York	21,385,590 ✓	$1.2488	$26,706,881.82 ✓	
Pennsylvania	8,958,682 ✓	$1.6809	$15,058,933.12 ✓	
Add: Reserve For Gas Replacement				
New York			(0.00)	(Positive amount recorded to Account 253551 - Negative amount recorded to 591800)
Pennsylvania			0.00	(Positive amount recorded to Account 253552 - Negative amount recorded to 591800)
			(0.00)	
Gas Stored Underground Current	30,344,272	$1.3764	$41,765,814.94	Agrees to B/S a/c # 164100
New York	21,385,590	$1.2488	26,706,881.82	- OK
Pennsylvania	8,958,682	$1.6809	15,058,933.12	- OK
	30,344,272	$1.3764	$41,765,814.94	

Ties to layer rate table (next page)

UPDATE LINKS		Note: Links neede
	Prior Month YTD	Do not use links for

Purchased Gas Sold	Mcf	Monthly	Dollars	Mcf	YTD	Dollars
Injections						
New York	1,625,125		2,878,908.94	1,625,125		2,878,908.94
Pennsylvania	833,358		4,454,215.17	833,358		4,454,215.17
	2,458,483		7,333,124.11	2,458,483		7,333,124.11
Withdrawals						
New York	210,332		372,603.14	210,332		372,603.14
Pennsylvania	29,907		159,849.92	29,907		159,849.92
	240,239		532,453.06	240,239		532,453.06

A = Agrees to prior month ending balance
B = Agrees to calculated NY storage rate
C = Agrees to calculated PA storage rate
D = Agrres to estimated ending storage inventory balance

11/19/2024 9:28 AM

NFG Distribution Corporation
Storage Gas Inventory Priced at Layer Rates
10/31/2024

New FY 24 Incremental Layer rate added and ties to 9/30/24 file

W/S C
PRODUCT# 1902

**Please Note: First month following fiscal YE (Oct) when adding PY layer ensure that columns R-W are updated (copy & paste values) w/ PY ending balances (Sep 30 current month amounts at layer rates (X-AA). Also please note that formulas need to be reviewed & updated in rows V45-Z71 to ensure correct prior month reserve balance is referenced. The cell reference will shift due to added layer rate insert in Oct.

**Please Note: First month following fiscal YE (Oct)- Make sure to update the formulas of new years layer rate row for X,Y,Z,AA columns.

Layer Year	MCF 9/30/23 NY	MCF 9/30/23 PA	Layer Rate NY	Layer Rate PA	Amount 9/30/23 NY	Amount 9/30/23 PA	CURRENT MONTH MCF NY	CURRENT MONTH MCF PA	CURRENT MONTH Amount at Layer Rates NY	CURRENT MONTH Amount at Layer Rates PA
2025							1,414,793.00	803,451.00	2,506,305.80	4,294,365.25
2024	702,252	288,514	1.6447065	4.823600061	$ 1,154,998.42	$ 1,391,676.15	702,252	288,514	1,154,998.43	1,391,676.15
2023	92,382	-	1.6286354	0	$ 150,456.59	$ -	92,382	-	150,456.59	-
2022	-	-	0	0	$ -	$ -	-	-	0.00	-
2021	-	-	0	0	$ -	$ -	-	-	0.00	0.00
2020	551,946	497,240	1.4783043	3.7243000	$ 815,944.14	$ 1,851,870.93	551,946	497,240	815,944.14	1,851,870.93
2019	845,192	29,807	2.1754511	4.6127003	$ 1,838,673.90	$ 137,490.76	845,192	29,807	1,838,673.90	137,490.76
2018	455,033	-	2.5472239	0	$ 1,159,070.95	$ -	455,033	0	1,159,070.95	0.00
2017	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2016	-	150,371	0	3.8719000	$ -	$ 582,221.47	0	150,371	0.00	582,221.47
2015	-	153,235	1.5312976	4.1997000	$ -	$ 643,541.03	0	153,235	0.00	643,541.03
2014	-	122,940	0	6.0065144	$ -	$ 738,440.88	0	122,940	0.00	738,440.88
2013	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2012	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2011	517,091	-	4.9097543	0	$ 2,538,789.77	$ -	517,091	0	2,538,789.77	0.00
2010	500,421	-	5.2178791	0	$ 2,611,136.27	$ -	500,421	0	2,611,136.27	0.00
2007	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2003	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2002	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2001	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2000	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1999	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1997	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1996	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1995	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1994	391,383	-	3.7185166	3.7185166	$ 1,455,365.19	$ -	391,383	0	1,455,365.19	0.00
1993	15,915,097	6,913,124	0.7839186	0.7839186	$ 12,476,140.78	$ 5,419,326.65	15,915,097	6,913,124	12,476,140.78	5,419,327
	19,970,797	8,155,231	$ 1.21180	$ 1.31996	24,200,576.02	10,764,567.87	21,385,590	8,958,682	$ 26,706,881.82	$ 15,058,933.12
							Per W/S B	Per W/S B	Per W/S B	Per W/S B

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references- only if adding new row across the entire spreadsheet. FY 25 only added row within columns of table above so did not shift cell references.

Layers agree to 9/30/2024 file

Total volume = 30,344,272 mcf

Total = $41,765,814.94

1.248826029

Computation of Reserve for Gas Replacement

		NY	PA	TOTAL	
Inventory at FIFO Basis		26,706,881.82	15,058,933.12	41,765,814.94	per W/S B
Inventory at Layer Rates		26,706,881.82	15,058,933.12	41,765,814.94	
Required Reserve	Oct 31, 2024	$0.00	$0.00	$0.00	
Required Reserve as of	Oct 31, 2024	$0.00	$0.00	$0.00	
Required Reserve as of	Sep 30, 2024	$0.00	$0.00	$0.00	UPDATE LINK
Adjustment for Current Month		$0.00	$0.00	$0.00	

LIFO = FIFO in NY & PA

Michael Maggioli: Oct: Make sure to update cell ref from shift due to layer rate add in

Accounting Entry:

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references.

1774-164101	Gas Storage	$0.00
4776-164102	Gas Storage	0.00
1774-253551	Reserve for Gas Replacement	0.00
4776-253552	Reserve for Gas Replacement	0.00

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references.

Accounting Entry (NY Only):

			Dr. / (Cr.)
1774-164101	Gas Storage		$ (0.00)
1774-591800	Gas Injected into Storage (pge)		0.00
Booked prior month		9/30/24	$ (0.00)
NY Current Month Entry			(0.00)

-to adjust NY inventory balance for impact of negative reserve for gas replacement.

Accounting Entry (PA Only):

			Dr. / (Cr.)
1774-164101	Gas Storage		$ -
1774-591800	Gas Injected into Storage (pge)		-
Booked prior month		9/30/24	$ -
PA Current Month Entry			-

-to adjust PA inventory balance for impact of negative reserve for gas replacement.

Michael Maggioli: This was adjusted during Oct ME to reflect that we did not book the .01 rounding in Sep 23. Make sure to back this formula out in Nov 23.

NY Rate - October 2024

$2,878,909/1,625,125 MCF = $1.77/mcf - NY RATE

Calculation of FYTD RATE to Produce the Monthly Storage Journal Entry for NFGDC-NY

		MCF - Month	$$ - Month	COMMODITY Rate - Month	MCF - FYTD	$$ - FYTD	Rate - FYTD	
								1
October-24	INJ	1,625,125	2,878,909	$ 1.77150	1,625,125	2,878,909	$ 1.77150	2
	W/D	(210,332)	(372,603)	$ 1.77150	(210,332)	(372,603)	$ 1.77150	3
	NET	1,414,793	2,506,306	$ 1.77150	1,414,793	2,506,306	$ 1.77150	4
November-24	INJ		-	$ 1.65808	1,625,125	2,878,909	$ 1.77150	5
	W/D		-	$ 1.65808	(210,332)	(372,603)	$ 1.77150	6
	NET	-	-	$ -	1,414,793	2,506,306	$ 1.77150	7
December-24	INJ		-	$ 1.65808	1,625,125	2,878,909	$ 1.77150	8
	W/D		-	$ 1.65808	(210,332)	(372,603)	$ 1.77150	9
	NET	-	-	$ -	1,414,793	2,506,306	$ 1.77150	10
January-25	INJ		-	$ 1.65808	1,625,125	2,878,909	$ 1.77150	11
	W/D		-	$ 1.65808	(210,332)	(372,603)	$ 1.77150	12
	NET	-	-	$ -	1,414,793	2,506,306	$ 1.77150	13
February-25	INJ		-	$ 1.65808	1,625,125	2,878,909	$ 1.77150	14
	W/D		-	$ 1.65808	(210,332)	(372,603)	$ 1.77150	15
	NET	-	-	$ -	1,414,793	2,506,306	$ 1.77150	16
March-25	INJ		-	$ 1.65808	1,625,125	2,878,909	$ 1.77150	17
	W/D		-	$ 1.65808	(210,332)	(372,603)	$ 1.77150	18
	NET	-	-	$ -	1,414,793	2,506,306	$ 1.77150	19
April-25	INJ		#N/A	#N/A	1,625,125	#N/A	#N/A	20
	W/D		#N/A	#N/A	(210,332)	#N/A	#N/A	21
	NET	-	#N/A	0	1,414,793	#N/A	#N/A	22
May-25	INJ		#N/A	#N/A	1,625,125	#N/A	#N/A	23
	W/D		#N/A	#N/A	(210,332)	#N/A	#N/A	24
	NET	-	#N/A	$ -	1,414,793	#N/A	#N/A	25
June-25	INJ		#N/A	#N/A	1,625,125	#N/A	#N/A	26
	W/D		#N/A	#N/A	(210,332)	#N/A	#N/A	27
	NET	-	#N/A	$ -	1,414,793	#N/A	#N/A	28
July-25	INJ		#N/A	#N/A	1,625,125	#N/A	#N/A	29
	W/D		#N/A	#N/A	(210,332)	#N/A	#N/A	30
	NET	-	#N/A	$ -	1,414,793	#N/A	#N/A	31
August-25	INJ		#N/A	#N/A	1,625,125	#N/A	#N/A	32
	W/D		#N/A	#N/A	(210,332)	#N/A	#N/A	33
	NET	-	#N/A	$ -	1,414,793	#N/A	#N/A	34
September-25	INJ		#N/A	#N/A	1,625,125	#N/A	#N/A	35
	W/D		#N/A	#N/A	(210,332)	#N/A	#N/A	36
	NET	-	#N/A	$ -	1,414,793	#N/A	#N/A	37
						#N/A		

Michael Maggioli:
Begg. In Nov and through April- Reminder to update formula to pull Weighted Avg Rate (7 columns) instead of Commodity Rate (3 columns).

Michael Maggioli:

Begg. In May and through October- Reminder to update formula to pull Commodity Rate (3 columns) instead of Weighted avg. Rate (7 columns).

PA Rate - Q1 2025

To: M. Maggioli

From: C. Mann

Date: November 12, 2024

Re: PAD Storage Rates

The storage rates in effect for the 1st Quarter of FY25 are derived as follows:

	($/Mcf) (a)
Demand	$2.5567
Commodity	$2.7882
Total	$5.3449

Qtrly PA Stroage Rates- Updated on Schedules Tab

Notes:
(1) Storage Rates are derived at Delivered Volume to NFGDC with 12 months of projected values.

cc:
N. Pasquarella
A. Riffel
M. Duszenko
L. Petko
S. Suarez
L. Metzger
M. Maggioli
D. Koch
T. Wesoloski

National Fuel Gas Distribution Corporation
Pennsylvania Division
Unit Storage Gas Cost ($/Mcf)
For the Twelve Months Ending September 2025

Conversion Factor **1.051**

	Projected Oct-24	Projected Nov-24	Projected Dec-24	Projected Jan-25	Projected Feb-25	Projected Mar-25	Projected Apr-25	Projected May-25	Projected Jun-25	Projected Jul-25	Projected Aug-25	Projected Sep-25	Total
Demand													
Upstream Purchased Gas Cost	$3,153,492	$3,143,006	$3,112,793	$3,127,909	$3,127,909	$3,122,864	$3,152,768	$3,147,742	$3,152,768	$3,152,768	$3,162,839	$3,172,910	$37,729,768
Appalachian Gas Cost	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Local Production Gas Cost	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Storage Rental & Transp. Cost	$1,507,468	$1,507,468	$1,507,468	$1,507,468	$1,507,468	$1,507,468	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$18,747,702
Total Demand Cost	$4,660,960	$4,650,474	$4,620,261	$4,635,377	$4,635,377	$4,630,332	$4,769,917	$4,764,891	$4,769,917	$4,769,917	$4,779,988	$4,790,059	$56,477,470
Less: Offsystem Sales Purchase	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Net Demand Cost	$4,660,960	$4,650,474	$4,620,261	$4,635,377	$4,635,377	$4,630,332	$4,769,917	$4,764,891	$4,769,917	$4,769,917	$4,779,988	$4,790,059	$56,477,470
Total Receipt Volume (Mcf)	1,541,440	2,144,639	1,292,788	2,208,360	2,377,365	2,199,960	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	22,264,169
Less: Total Shrinkage (Mcf)	12,515	14,320	21,316	26,086	23,479	17,667	18,730	12,845	6,984	6,734	6,734	6,624	174,031
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	-
(1) Storage Rates are derived at Delivered \	1,528,925	2,130,320	1,271,472	2,182,274	2,353,887	2,182,293	1,466,387	1,959,396	2,400,279	1,569,915	1,575,501	1,469,489	22,090,138
9 months of projected values.													
Unit Storage Demand Gas Cost ($/Mcf)													$2.5567
Commodity													
Upstream Purchased Gas Cost	$3,022,215	$3,327,524	$6,802,689	$8,021,006	$7,243,508	$4,768,062	$5,362,512	$6,343,641	$4,054,241	$4,245,768	$3,909,911	$3,682,545	$60,783,623
Appalachian Gas Cost	$16,292	$16,555	$20,972	$23,217	$20,169	$20,112	$18,447	$19,479	$20,182	$22,357	$22,611	$21,715	$242,108
Local Production Gas Cost	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Storage Rental & Transp. Cost	$43,423	$33,114	$38,933	$77,101	$59,404	$69,850	$3,589	$50,569	$48,914	$49,043	$44,207	$49,541	$567,688
Total Commodity Cost	$3,081,930	$3,377,193	$6,862,594	$8,121,324	$7,323,081	$4,858,024	$5,384,548	$6,413,689	$4,123,337	$4,317,168	$3,976,729	$3,753,801	$61,593,419
Less: Offsystem Sales Purchases	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Net Commodity Cost	$3,081,930	$3,377,193	$6,862,594	$8,121,324	$7,323,081	$4,858,024	$5,384,548	$6,413,689	$4,123,337	$4,317,168	$3,976,729	$3,753,801	$61,593,419
Total Receipt Volume (Mcf)	1,541,440	2,144,639	1,292,788	2,208,360	2,377,365	2,199,960	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	22,264,169
Less: Total Shrinkage (Mcf)	12,515	14,320	21,316	26,086	23,479	17,667	18,730	12,845	6,984	6,734	6,734	6,624	174,031
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	1,528,925	2,130,320	1,271,472	2,182,274	2,353,887	2,182,293	1,466,387	1,959,396	2,400,279	1,569,915	1,575,501	1,469,489	22,090,138
Unit Storage Commodity Gas Cost ($/Mcf)													$2.7882

Notes:
1. Based on the PGC 2024 November Quarterly Filing
2. Using 1.051 Mcf/Dth conversion factor

C:\Users\bucholzb\AppData\Local\Microsoft\Windows\INetCache\Content.Outlook\O7GR4ALR\[Sto 11_24.xlsx]B

NFG Distribution Corporation
Inventory Cost Record as Booked
November 30, 2024
F:\Accounting\SOX Secured Files\Monthly Entries NFGDC\Monthly\STORAGE\Stor25\[Stor1124.xls]calc mcf

W/S B
Product 1902

	Current Month MCF	Rate	Amount	Since October 1st MCF	Rate *	Amount
UPDATE LINKS						
Balance Beginning of Period						
New York	A 21,385,590 ✓	1.2488 ✓	A $26,706,881.82 ✓	19,970,797 ✓	$1.2118 ✓	$24,200,576.02 ✓
Pennsylvania	8,958,682 ✓	1.6809 ✓	$15,058,933.12 ✓	8,155,231 ✓	$1.3200 ✓	$10,764,567.87 ✓
	30,344,272 ✓	1.3764 ✓	$41,765,814.94 ✓	28,126,028 ✓	1.2432 ✓	$34,965,143.89 ✓
Input - New York	375,892 ✓	B 1.6581 ✓	623,259.42 ✓	2,001,017 ✓	1.7502 ✓	3,502,168.36 ✓
- Pennsylvania	(36,713) ✓	5.3449 ✓	(196,227.31) ✓	796,645 ✓	C 5.3449 ✓	4,257,987.86 ✓
Output - New York	1,346,381 ✓	B 1.6581 ✓	2,232,408.91 ✓	1,556,713 ✓	1.6734 ✓	2,605,012.05 ✓
- Pennsylvania	743,355 ✓	5.3449 ✓	3,973,158.14 ✓	773,262 ✓	C 5.3449 ✓	4,133,008.06 ✓
Net - New York	(970,489) ✓	1.6581	$ (1,609,149.49)	444,304 ✓	2.0192	$ 897,156.31
Net - Pennsylvania	(780,068) ✓	5.3449	$ (4,169,385.45)	23,383 ✓	5.3449	$ 124,979.80
	(1,750,557) ✓	3.3010	$ (5,778,534.94)	467,687 ✓	2.1855	$ 1,022,136.11
Loss	0	0.0000	0.00	0	0.0000	0.00
Balance End of Period to W/S C						
New York	D 20,415,101 ✓	$1.2294	$25,097,732.33 ✓	20,415,101 ✓	$1.2294	$25,097,732.33 ✓
Pennsylvania	8,178,614 ✓	$1.3315	$10,889,547.67 ✓	8,178,614 ✓	$1.3315	$10,889,547.67 ✓
TOTAL	28,593,715 ✓	$1.2586	$35,987,280.00 ✓	28,593,715 ✓	$1.2586	$35,987,280.00 ✓
* Rate per Valuation Department	20,415,101	0	0			- OK
	8,178,614	0	0			- OK

Michael Maggioli:
Updated 11/24

UPDATE LINKS					Note: Links neede
A	1,625,125	A	2,878,909		Do not use links for
	833,358		4,454,215		
	210,332		372,603		
	29,907		159,849		
NY	1,414,793		2,506,305.80		
PA	803,451		4,294,365.25		

Michael Maggioli:
10/31/24-
Updated with

UPDATE FIRST MONTH OF FISCAL YEAR

Gas Stored Underground YTD (9/30/2024)

New York	19,970,797	$	1.211798	$24,200,576.02
Pennsylvania	8,155,231	$	1.319959	10,764,567.87
	28,126,028	$	1.243160	$34,965,143.89

Gas Stored Underground Current

New York	20,415,101 ✓	$ 1.2294	25,097,732.33 ✓
Pennsylvania	8,178,614 ✓	$ 1.3315	10,889,547.67 ✓
	28,593,715	$1.2586	$35,987,280.00

Balance Sheet Presentation
Gas Stored Underground Current (LIFO)

New York	20,415,101	$1.2294	$25,097,732.33 ✓	Ties to layer rate table (next page)
Pennsylvania	8,178,614	$1.3315	$10,889,547.67 ✓	
Add: Reserve For Gas Replacement				
New York			(0.00)	(Positive amount recorded to Account 253551 - Negative amount recorded to 591800)
Pennsylvania			0.00	(Positive amount recorded to Account 253552 - Negative amount recorded to 591800)
			(0.00)	
Gas Stored Underground Current	28,593,715	$1.2586	$35,987,280.00	Agrees to B/S a/c # 164100
New York	20,415,101	$1.2294	25,097,732.33	- OK
Pennsylvania	8,178,614	$1.3315	10,889,547.67	- OK
	28,593,715	$1.2586	$35,987,280.00	

Michael Maggioli:
Updated 11/24

UPDATE LINKS						Note: Links neede
Prior Month YTD						Do not use links for
A	1,625,125	$	A	2,878,909.94		
	833,358	$		4,454,215.17		
	2,458,483			7,333,124		
	210,332	$		372,603.14		
	29,907	$		159,849.92		
	240,239			532,453		

Purchased Gas Sold

	Mcf	Monthly	Dollars	Mcf	YTD	Dollars
Injections						
New York	375,892		623,259.42	2,001,017		3,502,168.36
Pennsylvania	(36,713)		(196,227.31)	796,645		4,257,987.86
	339,179		427,032.11	2,797,662		7,760,156.22
Withdrawals						
New York	1,346,381		2,232,408.91	1,556,713		2,605,012.05
Pennsylvania	743,355		3,973,158.14	773,262		4,133,008.06
	2,089,736		6,205,567.05	2,329,975		6,738,020.11

A = Agrees to prior month ending balance
B = Agrees to calculated NY Storage rate
C = Agrees to calculated PA Storage rate
D = Agrees to esimated ending storage inventory balance

12/10/2024 2:28 PM

NFG Distribution Corporation
Storage Gas Inventory Priced at Layer Rates
11/30/2024

W/S C
PRODUCT# 1902

**Please Note: First month following fiscal YE (Oct) when adding PY layer ensure that columns R-W are updated (copy & paste values) w/ PY ending balances (Sep 30 current month amounts at layer rates (X-AA). Also please note that formulas need to be reviewed & updated in rows V45-Z71 to ensure correct prior month reserve balance is referenced. The cell reference will shift due to added layer rate insert in Oct.

**Please Note: First month following fiscal YE (Oct)- Make sure to update the formulas of new years layer rate row for X,Y,Z,AA columns.

Layer Year	MCF 9/30/24 NY	MCF 9/30/24 PA	Layer Rate NY	Layer Rate PA	Amount 9/30/24 NY	Amount 9/30/24 PA	CURRENT MONTH MCF NY	CURRENT MONTH MCF PA	CURRENT MONTH Amount at Layer Rates NY	CURRENT MONTH Amount at Layer Rates PA
2025							444,304.00 ✓	23,383.00 ✓	897,156.31 ✓	124,979.80 ✓
2024	702,252	288,514	1.6447065	4.823600061	$ 1,154,998.42	$ 1,391,676.15	702,252	288,514	1,154,998.43	1,391,676.15
2023	92,382	-	1.6286354	0	$ 150,456.59	$ -	92,382	-	150,456.59	-
2022	-	-	0	0	$ -	$ -	-	-	0.00	-
2021	-	-	0	0	$ -	$ -	-	-	0.00	0.00
2020	551,946	497,240	1.4783043	3.7243000	$ 815,944.14	$ 1,851,870.93	551,946	497,240	815,944.14	1,851,870.93
2019	845,192	29,807	2.1754511	4.6127003	$ 1,838,673.90	$ 137,490.76	845,192	29,807	1,838,673.90	137,490.76
2018	455,033	-	2.5472239	0	$ 1,159,070.95	$ -	455,033	0	1,159,070.95	0.00
2017	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2016	-	150,371	0	3.8719000	$ -	$ 582,221.47	0	150,371	0.00	582,221.47
2015	-	153,235	1.5312976	4.1997000	$ -	$ 643,541.03	0	153,235	0.00	643,541.03
2014	-	122,940	0	6.0065144	$ -	$ 738,440.88	0	122,940	0.00	738,440.88
2013	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2012	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2011	517,091	-	4.9097543	0	$ 2,538,789.77	$ -	517,091	0	2,538,789.77	0.00
2010	500,421	-	5.2178791	0	$ 2,611,136.27	$ -	500,421	0	2,611,136.27	0.00
2007	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2003	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2002	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2001	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2000	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1999	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1997	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1996	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1995	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1994	391,383	-	3.7185166	3.7185166	$ 1,455,365.19	$ -	391,383	0	1,455,365.19	0.00
1993	15,915,097	6,913,124	0.7839186	0.7839186	$ 12,476,140.78	$ 5,419,326.65	15,915,097	6,913,124	12,476,140.78	5,419,327
	19,970,797	8,155,231	$ 1.21180	$ 1.31996	24,200,576.02	10,764,567.87	20,415,101	8,178,614	$ 25,097,732.33	$ 10,889,547.67
							Per W/S B	Per W/S B	Per W/S B	Per W/S B

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references- only if adding new row across the entire spreadsheet. FY 25 only added row within columns of table above so did not shift cell references.

Layers agree to 9/30/2024 file

Total volume = 28,593,715 mcf

Total = $35,987,280.00

LIFO = FIFO in NY & PA

Computation of Reserve for Gas Replacement

1.229370942

		PA	TOTAL	
Inventory at FIFO Basis		25,097,732.33	10,889,547.67	35,987,280.00 per W/S B
Inventory at Layer Rates		25,097,732.33	10,889,547.67	35,987,280.00
Required Reserve	Nov 30, 2024	$0.00	$0.00	$0.00
Required Reserve as of	Nov 30, 2024	$0.00	$0.00	$0.00
Required Reserve as of	Oct 31, 2024	$0.00	$0.00	$0.00 UPDATE LINK
Adjustment for Current Month		$0.00	$0.00	$0.00

Michael Maggioli: Oct: Make sure to update cell ref from shift due to layer rate add in above table.

Accounting Entry:

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references.

1774-164101	Gas Storage	$0.00
4776-164102	Gas Storage	0.00
1774-253551	Reserve for Gas Replacement	0.00
4776-253552	Reserve for Gas Replacement	(0.00)

Accounting Entry (NY Only):

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell

			Dr. / (Cr.)
1774-164101	Gas Storage		$ (0.00)
1774-591800	Gas Injected into Storage (pge)		0.00
Booked prior month		10/31/24	$ -
NY Current Month Entry			(0.00)

-to adjust NY inventory balance for impact of negative reserve for gas replacement.

Accounting Entry (PA Only):

			Dr. / (Cr.)
1774-164101	Gas Storage		$ -
1774-591800	Gas Injected into Storage (pge)		-
Booked prior month		10/31/24	$ -
PA Current Month Entry			-

-to adjust PA inventory balance for impact of negative reserve for gas replacement.

Michael Maggioli: This was adjusted during Oct ME to reflect that we did not book the .01 rounding in Sep 23. Make sure to back this formula

12/10/2024 2:30 PM

NY Rate -
November 2024

$623,259/375,892 MCF = $1.66/mcf - NY RATE

Calculation of FYTD RATE to Produce the Monthly Storage Journal Entry for NFGDC-NY

		MCF - Month	$$ - Month	COMMODITY Rate - Month	MCF - FYTD	$$ - FYTD	Rate - FYTD	
								1
October-24	INJ	1,625,125	2,878,909	$ 1.77150	1,625,125	2,878,909	$ 1.77150	2
	W/D	(210,332)	(372,603)	$ 1.77150	(210,332)	(372,603)	$ 1.77150	3
	NET	1,414,793	2,506,306	$ 1.77150	1,414,793	2,506,306	$ 1.77150	4
November-24	INJ	375,892	623,259	$ 1.65808	2,001,017	3,502,168	$ 1.75019	5
	W/D	(1,346,381)	(2,232,409)	$ 1.65808	(1,556,713)	(2,605,012)	$ 1.67341	6
	NET	(970,489)	(1,609,149)	$ 1.65808	444,304	897,156	$ 2.01924	7
December-24	INJ		-	$ 1.65808	2,001,017	3,502,168	$ 1.75019	8
	W/D		-	$ 1.65808	(1,556,713)	(2,605,012)	$ 1.67341	9
	NET	-	-	$ -	444,304	897,156	$ 2.01924	10
January-25	INJ		-	$ 1.65808	2,001,017	3,502,168	$ 1.75019	11
	W/D		-	$ 1.65808	(1,556,713)	(2,605,012)	$ 1.67341	12
	NET	-	-	$ -	444,304	897,156	$ 2.01924	13
February-25	INJ		-	$ 1.65808	2,001,017	3,502,168	$ 1.75019	14
	W/D		-	$ 1.65808	(1,556,713)	(2,605,012)	$ 1.67341	15
	NET	-	-	$ -	444,304	897,156	$ 2.01924	16
March-25	INJ		-	$ 1.65808	2,001,017	3,502,168	$ 1.75019	17
	W/D		-	$ 1.65808	(1,556,713)	(2,605,012)	$ 1.67341	18
	NET	-	-	$ -	444,304	897,156	$ 2.01924	19
April-25	INJ		#N/A	#N/A	2,001,017	#N/A	#N/A	20
	W/D		#N/A	#N/A	(1,556,713)	#N/A	#N/A	21
	NET	-	#N/A	0	444,304	#N/A	#N/A	22
May-25	INJ		#N/A	#N/A	2,001,017	#N/A	#N/A	23
	W/D		#N/A	#N/A	(1,556,713)	#N/A	#N/A	24
	NET	-	#N/A	$ -	444,304	#N/A	#N/A	25
June-25	INJ		#N/A	#N/A	2,001,017	#N/A	#N/A	26
	W/D		#N/A	#N/A	(1,556,713)	#N/A	#N/A	27
	NET	-	#N/A	$ -	444,304	#N/A	#N/A	28
July-25	INJ		#N/A	#N/A	2,001,017	#N/A	#N/A	29
	W/D		#N/A	#N/A	(1,556,713)	#N/A	#N/A	30
	NET	-	#N/A	$ -	444,304	#N/A	#N/A	31
August-25	INJ		#N/A	#N/A	2,001,017	#N/A	#N/A	32
	W/D		#N/A	#N/A	(1,556,713)	#N/A	#N/A	33
	NET	-	#N/A	$ -	444,304	#N/A	#N/A	34
September-25	INJ		#N/A	#N/A	2,001,017	#N/A	#N/A	35
	W/D		#N/A	#N/A	(1,556,713)	#N/A	#N/A	36
	NET	-	#N/A	$ -	444,304	#N/A	#N/A	37

Michael Maggioli:
Begg. In Nov and through April- Reminder to update formula to pull Weighted Avg Rate (7 columns) instead of Commodity Rate (3 columns).

Michael Maggioli:

Begg. In May and through October- Reminder to update formula to pull Commodity Rate (3 columns) instead of Weighted avg. Rate (7 columns).

PA Rate - Q1 2025

To: M. Maggioli

From: C. Mann

Date: November 12, 2024

Re: PAD Storage Rates

The storage rates in effect for the 1st Quarter of FY25 are derived as follows:

	($/Mcf) (a)
Demand	$2.5567
Commodity	$2.7882
Total	$5.3449

Qtrly PA Stroage Rates- Updated on Schedules Tab

Notes:
(1) Storage Rates are derived at Delivered Volume to NFGDC with 12 months of projected values.

cc:
N. Pasquarella
A. Riffel
M. Duszenko
L. Petko
S. Suarez
L. Metzger
M. Maggioli
D. Koch
T. Wesoloski

National Fuel Gas Distribution Corporation
Pennsylvania Division
Unit Storage Gas Cost ($/Mcf)
For the Twelve Months Ending September 2025

Conversion Factor **1.051**

	Projected Oct-24	Projected Nov-24	Projected Dec-24	Projected Jan-25	Projected Feb-25	Projected Mar-25	Projected Apr-25	Projected May-25	Projected Jun-25	Projected Jul-25	Projected Aug-25	Projected Sep-25	Total
Demand													
Upstream Purchased Gas Cost	$3,153,492	$3,143,006	$3,112,793	$3,127,909	$3,127,909	$3,122,864	$3,152,768	$3,147,742	$3,152,768	$3,152,768	$3,162,839	$3,172,910	$37,729,768
Appalachian Gas Cost	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Local Production Gas Cost	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Storage Rental & Transp. Cost	$1,507,468	$1,507,468	$1,507,468	$1,507,468	$1,507,468	$1,507,468	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$18,747,702
Total Demand Cost	$4,660,960	$4,650,474	$4,620,261	$4,635,377	$4,635,377	$4,630,332	$4,769,917	$4,764,891	$4,769,917	$4,769,917	$4,779,988	$4,790,059	$56,477,470
Less: Offsystem Sales Purchase	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Net Demand Cost	$4,660,960	$4,650,474	$4,620,261	$4,635,377	$4,635,377	$4,630,332	$4,769,917	$4,764,891	$4,769,917	$4,769,917	$4,779,988	$4,790,059	$56,477,470
Total Receipt Volume (Mcf)	1,541,440	2,144,639	1,292,788	2,208,360	2,377,365	2,199,960	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	22,264,169
Less: Total Shrinkage (Mcf)	12,515	14,320	21,316	26,086	23,479	17,667	18,730	12,845	6,984	6,734	6,734	6,624	174,031
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	-
(1) Storage Rates are derived at Delivered \	1,528,925	2,130,320	1,271,472	2,182,274	2,353,887	2,182,293	1,466,387	1,959,396	2,400,279	1,569,915	1,575,501	1,469,489	22,090,138
9 months of projected values.													
Unit Storage Demand Gas Cost ($/Mcf)													$2.5567
Commodity													
Upstream Purchased Gas Cost	$3,022,215	$3,327,524	$6,802,689	$8,021,006	$7,243,508	$4,768,062	$5,362,512	$6,343,641	$4,054,241	$4,245,768	$3,909,911	$3,682,545	$60,783,623
Appalachian Gas Cost	$16,292	$16,555	$20,972	$23,217	$20,169	$20,112	$18,447	$19,479	$20,182	$22,357	$22,611	$21,715	$242,108
Local Production Gas Cost	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Storage Rental & Transp. Cost	$43,423	$33,114	$38,933	$77,101	$59,404	$69,850	$3,589	$50,569	$48,914	$49,043	$44,207	$49,541	$567,688
Total Commodity Cost	$3,081,930	$3,377,193	$6,862,594	$8,121,324	$7,323,081	$4,858,024	$5,384,548	$6,413,689	$4,123,337	$4,317,168	$3,976,729	$3,753,801	$61,593,419
Less: Offsystem Sales Purchases	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Net Commodity Cost	$3,081,930	$3,377,193	$6,862,594	$8,121,324	$7,323,081	$4,858,024	$5,384,548	$6,413,689	$4,123,337	$4,317,168	$3,976,729	$3,753,801	$61,593,419
Total Receipt Volume (Mcf)	1,541,440	2,144,639	1,292,788	2,208,360	2,377,365	2,199,960	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	22,264,169
Less: Total Shrinkage (Mcf)	12,515	14,320	21,316	26,086	23,479	17,667	18,730	12,845	6,984	6,734	6,734	6,624	174,031
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	1,528,925	2,130,320	1,271,472	2,182,274	2,353,887	2,182,293	1,466,387	1,959,396	2,400,279	1,569,915	1,575,501	1,469,489	22,090,138
Unit Storage Commodity Gas Cost ($/Mcf)													$2.7882

Notes:
1. Based on the PGC 2024 November Quarterly Filing
2. Using 1.051 Mcf/Dth conversion factor

C:\Users\bucholzb\AppData\Local\Microsoft\Windows\INetCache\Content.Outlook\O7GR4ALR\[Sto 11_24.xlsx]B

NFG Distribution Corporation
Inventory Cost Record as Booked
December 31, 2024
F:\Accounting\SOX Secured Files\Monthly Entries NFGDC\Monthly\STORAGE\Stor25\[Stor1224.xls]calc mcf

W/S B
Product 1902

	Current Month MCF	Rate	Amount	Since October 1st MCF	Rate *	Amount
UPDATE LINKS						
Balance Beginning of Period						
New York	A 20,415,101 ✓	1.2294 ✓	A $25,097,732.33 ✓	19,970,797 ✓	$1.2118 ✓	$24,200,576.02 ✓
Pennsylvania	8,178,614 ✓	1.3315 ✓	$10,889,547.67 ✓	8,155,231 ✓	$1.3200 ✓	$10,764,567.87 ✓
	28,593,715 ✓	1.2586 ✓	$35,987,280.00 ✓	28,126,028 ✓	1.2432 ✓	$34,965,143.89 ✓
Input - New York	35,005 ✓	B 1.6581 ✓	58,041.13 ✓	2,036,022 ✓	1.7486 ✓	3,560,209.49 ✓
- Pennsylvania	18,995 ✓	5.3449 ✓	101,526.38 ✓	815,640 ✓	C 5.3449 ✓	4,359,514.24 ✓
Output - New York	3,141,052 ✓	B 1.6581 ✓	5,208,119.00 ✓	4,697,765 ✓	1.6632 ✓	7,813,131.05 ✓
- Pennsylvania	1,250,021 ✓	5.3449 ✓	6,681,237.25 ✓	2,023,283 ✓	C 5.3449 ✓	10,814,245.31 ✓
Net - New York	(3,106,047) ✓	1.6581	$ (5,150,077.87) ✓	(2,661,743) ✓	1.5978	$ (4,252,921.56)
Net - Pennsylvania	(1,231,026) ✓	5.3449	$ (6,579,710.87) ✓	(1,207,643) ✓	5.3449	$ (6,454,731.07)
	(4,337,073) ✓	2.7045	$ (11,729,788.74) ✓	(3,869,386) ✓	2.7673	$ (10,707,652.63)
Loss	0	0.0000	0.00	0	0.0000	0.00
Balance End of Period to W/S C						
New York	D 17,309,054 ✓	$1.1524 ✓	$19,947,654.46 ✓	17,309,054	$1.1524	$19,947,654.46
Pennsylvania	6,947,588 ✓	$0.6203 ✓	$4,309,836.80 ✓	6,947,588	$0.6203	$4,309,836.80
TOTAL	24,256,642 ✓	$1.0000 ✓	$24,257,491.26 ✓	24,256,642	$1.0000	$24,257,491.26
* Rate per Valuation Department	17,309,054	0	0			- OK
	6,947,588	0	0			- OK

Michael Maggioli:
Updated 11/24

UPDATE LINKS		Note: Links neede
A 2,001,017	A 3,502,168	Do not use links for
796,645	4,257,988	
1,556,713	2,605,012	
773,262	4,133,008	
NY 444,304	897,156.31	
PA 23,383	124,979.80	

Michael Maggioli:
10/31/24- Updated with 9/30/24 balances

UPDATE FIRST MONTH OF FISCAL YEAR

Gas Stored Underground Current

New York	17,309,054	$ 1.1524	19,947,654.46
Pennsylvania	6,947,588	$ 0.6203	4,309,836.80
	24,256,642	$1.0000	$24,257,491.26

Gas Stored Underground YTD (9/30/2024)

New York	19,970,797	$ 1.211798	$24,200,576.02
Pennsylvania	8,155,231	$ 1.319959	10,764,567.87
	28,126,028	$ 1.243160	$34,965,143.89

Balance Sheet Presentation

Gas Stored Underground Current (LIFO)				
New York	17,309,054	$1.1524	$19,947,654.46	
Pennsylvania	6,947,588	$0.6203	$4,309,836.80	
Add: Reserve For Gas Replacement				
New York			(939,564.36) ✓	(Positive amount recorded to Account 253551 - Negative amount recorded to 591800)
Pennsylvania			1,316,498.36 ✓	(Positive amount recorded to Account 253552 - Negative amount recorded to 591800)
			376,934.00	
Gas Stored Underground Current	24,256,642	$1.0156	$24,634,425.26	Agrees to B/S a/c # 164100
New York	17,309,054 ✓	$1.0982	19,008,090.10 ✓	- OK
Pennsylvania	6,947,588 ✓	$0.8098	5,626,335.16 ✓	- OK
	24,256,642	$1.0156	$24,634,425.26	

Ties to layer rate table (next page)

Michael Maggioli:
Updated 11/24

Purchased Gas Sold	Mcf	Monthly	Dollars	Mcf	YTD	Dollars
Injections						
New York	35,005		58,041.13	2,036,022		3,560,209.49
Pennsylvania	18,995		101,526.38	815,640		4,359,514.24
	54,000		159,567.51	2,851,662		7,919,723.73
Withdrawals						
New York	3,141,052		5,208,119.00	4,697,765		7,813,131.05
Pennsylvania	1,250,021		6,681,237.25	2,023,283		10,814,245.31
	4,391,073		11,889,356.25	6,721,048		18,627,376.36

UPDATE LINKS		Note: Links neede
Prior Month YTD		Do not use links for
A 2,001,017	$ A 3,502,168.36	
796,645	$ 4,257,987.85	
2,797,662	7,760,156	
1,556,713	$ 2,605,012.05	
773,262	$ 4,133,008.06	
2,329,975	6,738,020	

A = Agrees to prior month ending balance
B = Agrees to calculated NY storage rate
C = Agrees to calculated PA storage rate
D = Agrees to estimated ending storage inventory balance

1/8/2025 3:54 PM

NFG Distribution Corporation
Storage Gas Inventory Priced at Layer Rates
12/31/2024

W/S C
PRODUCT# 1902

**Please Note: First month following fiscal YE (Oct) when adding PY layer ensure that columns R-W are updated (copy & paste values) w/ PY ending balances (Sep 30 current month amounts at layer rates (X-AA). Also please note that formulas need to be reviewed & updated in rows V45-Z71 to ensure correct prior month reserve balance is referenced. The cell reference will shift due to added layer rate insert in Oct.

**Please Note: First month following fiscal YE (Oct)- Make sure to update the formulas of new years layer rate row for X,Y,Z,AA columns.

Layer Year	MCF 9/30/24 NY	MCF 9/30/24 PA	Layer Rate NY	Layer Rate PA	Amount 9/30/24 NY	Amount 9/30/24 PA	CURRENT MONTH MCF NY	CURRENT MONTH MCF PA	CURRENT MONTH Amount at Layer Rates NY	CURRENT MONTH Amount at Layer Rates PA
2025							-	-	-	-
2024	702,252	288,514	1.6447065	4.823600061	$ 1,154,998.42	$ 1,391,676.15	-	-	-	-
2023	92,382	-	1.6286354	0	$ 150,456.59	$ -	-	-	0.00	-
2022	-	-	0	0	$ -	$ -	-	-	0.00	-
2021	-	-	0	0	$ -	$ -	-	-	0.00	0.00
2020	551,946	497,240	1.4783043	3.7243000	$ 815,944.14	$ 1,851,870.93	0	0	0.00	0.00
2019	845,192	29,807	2.1754511	4.6127003	$ 1,838,673.90	$ 137,490.76	0	0	0.00	0.00
2018	455,033	-	2.5472239	0	$ 1,159,070.95	$ -	0	0	0.00	0.00
2017	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2016	-	150,371	0	3.8719000	$ -	$ 582,221.47	0	0	0.00	0.00
2015	-	153,235	1.5312976	4.1997000	$ -	$ 643,541.03	0	0	0.00	0.00
2014	-	122,940	0	6.0065144	$ -	$ 738,440.88	0	34,464	0.00	207,008.51
2013	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2012	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2011	517,091	-	4.9097543	0	$ 2,538,789.77	$ -	502,153	0	2,465,447.86	0.00
2010	500,421	-	5.2178791	0	$ 2,611,136.27	$ -	500,421	0	2,611,136.27	0.00
2007	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2003	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2002	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2001	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2000	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1999	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1997	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1996	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1995	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1994	391,383	-	3.7185166	3.7185166	$ 1,455,365.19	$ -	391,383	0	1,455,365.19	0.00
1993	15,915,097	6,913,124	0.7839186	0.7839186	$ 12,476,140.78	$ 5,419,326.65	15,915,097	6,913,124	12,476,140.78	5,419,327
	19,970,797	8,155,231	$ 1.21180	$ 1.31996	24,200,576.02	10,764,567.87	17,309,054	6,947,588	$ 19,008,090.10	$ 5,626,335.16
							Per W/S B	Per W/S B	Per W/S B	Per W/S B

Layers agree to 9/30/2024 file

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references- only if adding new row across the entire spreadsheet. FY 25 only added row within columns of table above so did not shift cell references.

Total volume = 24,256,642 mcf

Total = $24,634,425.26

Computation of Reserve for Gas Replacement

1.098158787

		PA	TOTAL	
Inventory at FIFO Basis		19,947,654.46	4,309,836.80	24,257,491.26 per W/S B
Inventory at Layer Rates		19,008,090.10	5,626,335.16	24,634,425.26
Required Reserve	Dec 31, 2024	$0.00	$1,316,498.36	$376,934.00
Required Reserve as of	Dec 31, 2024	$0.00	$1,316,498.36	$1,316,498.36
Required Reserve as of	Nov 30, 2024	$0.00	$0.00	$0.00 UPDATE LINK
Adjustment for Current Month		$0.00	$1,316,498.36	$1,316,498.36

NY: LIFO > FIFO

PA: LIFO = FIFO

Michael Maggioli: Oct: Make sure to update cell ref from shift due to layer rate add in above table.

Accounting Entry:

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references.

1774-164101	Gas Storage	$0.00
4776-164102	Gas Storage	1,316,498.36
1774-253551	Reserve for Gas Replacement	0.00
4776-253552	Reserve for Gas Replacement	(1,316,498.36)

Accounting Entry (NY Only):

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references.

		Dr. / (Cr.)
1774-164101	Gas Storage	$ (939,564.36)
1774-591800	Gas Injected into Storage (pge)	939,564.36
Booked prior month	11/30/24	$ -
NY Current Month Entry		(939,564.36)

-to adjust NY inventory balance for impact of negative reserve for gas replacement.

Accounting Entry (PA Only):

		Dr. / (Cr.)
1774-164101	Gas Storage	$ -
1774-591800	Gas Injected into Storage (pge)	-
Booked prior month	11/30/24	$ -
PA Current Month Entry		-

-to adjust PA inventory balance for impact of negative reserve for gas replacement.

Michael Maggioli: This was adjusted during Oct ME to reflect that we did not book the .01 rounding in Sep 23. Make sure to back this formula out in Nov 23.

NY Rate - December 2024

$58,041/35,005 MCF = $1.66/mcf - NY RATE

Calculation of FYTD RATE to Produce the Monthly Storage Journal Entry for NFGDC-NY

		MCF - Month	$$ - Month	COMMODITY Rate - Month	MCF - FYTD	$$ - FYTD	Rate - FYTD	
								1
October-24	INJ	1,625,125	2,878,909	$ 1.77150	1,625,125	2,878,909	$ 1.77150	2
	W/D	(210,332)	(372,603)	$ 1.77150	(210,332)	(372,603)	$ 1.77150	3
	NET	1,414,793	2,506,306	$ 1.77150	1,414,793	2,506,306	$ 1.77150	4
November-24	INJ	375,892	623,259	$ 1.65808	2,001,017	3,502,168	$ 1.75019	5
	W/D	(1,346,381)	(2,232,409)	$ 1.65808	(1,556,713)	(2,605,012)	$ 1.67341	6
	NET	(970,489)	(1,609,149)	$ 1.65808	444,304	897,156	$ 2.01924	7
December-24	INJ	35,005	58,041	$ 1.65808	2,036,022	3,560,209	$ 1.74861	8
	W/D	(3,141,052)	(5,208,119)	$ 1.65808	(4,697,765)	(7,813,131)	$ 1.66316	9
	NET	(3,106,047)	(5,150,078)	$ 1.65808	(2,661,743)	(4,252,922)	$ 1.59780	10
January-25	INJ		-	$ 1.65808	2,036,022	3,560,209	$ 1.74861	11
	W/D		-	$ 1.65808	(4,697,765)	(7,813,131)	$ 1.66316	12
	NET	-	-	$ -	(2,661,743)	(4,252,922)	$ 1.59780	13
February-25	INJ		-	$ 1.65808	2,036,022	3,560,209	$ 1.74861	14
	W/D		-	$ 1.65808	(4,697,765)	(7,813,131)	$ 1.66316	15
	NET	-	-	$ -	(2,661,743)	(4,252,922)	$ 1.59780	16
March-25	INJ		-	$ 1.65808	2,036,022	3,560,209	$ 1.74861	17
	W/D		-	$ 1.65808	(4,697,765)	(7,813,131)	$ 1.66316	18
	NET	-	-	$ -	(2,661,743)	(4,252,922)	$ 1.59780	19
April-25	INJ		#N/A	#N/A	2,036,022	#N/A	#N/A	20
	W/D		#N/A	#N/A	(4,697,765)	#N/A	#N/A	21
	NET	-	#N/A	0	(2,661,743)	#N/A	#N/A	22
May-25	INJ		#N/A	#N/A	2,036,022	#N/A	#N/A	23
	W/D		#N/A	#N/A	(4,697,765)	#N/A	#N/A	24
	NET	-	#N/A	$ -	(2,661,743)	#N/A	#N/A	25
June-25	INJ		#N/A	#N/A	2,036,022	#N/A	#N/A	26
	W/D		#N/A	#N/A	(4,697,765)	#N/A	#N/A	27
	NET	-	#N/A	$ -	(2,661,743)	#N/A	#N/A	28
July-25	INJ		#N/A	#N/A	2,036,022	#N/A	#N/A	29
	W/D		#N/A	#N/A	(4,697,765)	#N/A	#N/A	30
	NET	-	#N/A	$ -	(2,661,743)	#N/A	#N/A	31
August-25	INJ		#N/A	#N/A	2,036,022	#N/A	#N/A	32
	W/D		#N/A	#N/A	(4,697,765)	#N/A	#N/A	33
	NET	-	#N/A	$ -	(2,661,743)	#N/A	#N/A	34
September-25	INJ		#N/A	#N/A	2,036,022	#N/A	#N/A	35
	W/D		#N/A	#N/A	(4,697,765)	#N/A	#N/A	36
	NET	-	#N/A	$ -	(2,661,743)	#N/A	#N/A	37

Michael Maggioli:
Begg. In Nov and through April- Reminder to update formula to pull Weighted Avg Rate (7 columns) instead of Commodity Rate (3 columns).

Michael Maggioli:

Begg. In May and through October- Reminder to update formula to pull Commodity Rate (3 columns) instead of Weighted avg. Rate (7 columns).

PA RATE - Q1 2025

To: M. Maggioli

From: C. Mann

Date: November 12, 2024

Re: PAD Storage Rates

The storage rates in effect for the 1st Quarter of FY25 are derived as follows:

	($/Mcf) (a)
Demand	$2.5567
Commodity	$2.7882
Total	$5.3449

Qtrly PA Stroage Rates- Updated on Schedules Tab

Notes:
(1) Storage Rates are derived at Delivered Volume to NFGDC with 12 months of projected values.

cc:
N. Pasquarella
A. Riffel
M. Duszenko
L. Petko
S. Suarez
L. Metzger
M. Maggioli
D. Koch
T. Wesoloski

National Fuel Gas Distribution Corporation
Pennsylvania Division
Unit Storage Gas Cost ($/Mcf)
For the Twelve Months Ending September 2025

Conversion Factor **1.051**

	Projected Oct-24	Projected Nov-24	Projected Dec-24	Projected Jan-25	Projected Feb-25	Projected Mar-25	Projected Apr-25	Projected May-25	Projected Jun-25	Projected Jul-25	Projected Aug-25	Projected Sep-25	Total
Demand													
Upstream Purchased Gas Cost	$3,153,492	$3,143,006	$3,112,793	$3,127,909	$3,127,909	$3,122,864	$3,152,768	$3,147,742	$3,152,768	$3,152,768	$3,162,839	$3,172,910	$37,729,768
Appalachian Gas Cost	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Local Production Gas Cost	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Storage Rental & Transp. Cost	$1,507,468	$1,507,468	$1,507,468	$1,507,468	$1,507,468	$1,507,468	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$18,747,702
Total Demand Cost	$4,660,960	$4,650,474	$4,620,261	$4,635,377	$4,635,377	$4,630,332	$4,769,917	$4,764,891	$4,769,917	$4,769,917	$4,779,988	$4,790,059	$56,477,470
Less: Offsystem Sales Purchase	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Net Demand Cost	$4,660,960	$4,650,474	$4,620,261	$4,635,377	$4,635,377	$4,630,332	$4,769,917	$4,764,891	$4,769,917	$4,769,917	$4,779,988	$4,790,059	$56,477,470
Total Receipt Volume (Mcf)	1,541,440	2,144,639	1,292,788	2,208,360	2,377,365	2,199,960	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	22,264,169
Less: Total Shrinkage (Mcf)	12,515	14,320	21,316	26,086	23,479	17,667	18,730	12,845	6,984	6,734	6,734	6,624	174,031
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	-
(1) Storage Rates are derived at Delivered \	1,528,925	2,130,320	1,271,472	2,182,274	2,353,887	2,182,293	1,466,387	1,959,396	2,400,279	1,569,915	1,575,501	1,469,489	22,090,138
9 months of projected values.													
Unit Storage Demand Gas Cost ($/Mcf)													$2.5567
Commodity													
Upstream Purchased Gas Cost	$3,022,215	$3,327,524	$6,802,689	$8,021,006	$7,243,508	$4,768,062	$5,362,512	$6,343,641	$4,054,241	$4,245,768	$3,909,911	$3,682,545	$60,783,623
Appalachian Gas Cost	$16,292	$16,555	$20,972	$23,217	$20,169	$20,112	$18,447	$19,479	$20,182	$22,357	$22,611	$21,715	$242,108
Local Production Gas Cost	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Storage Rental & Transp. Cost	$43,423	$33,114	$38,933	$77,101	$59,404	$69,850	$3,589	$50,569	$48,914	$49,043	$44,207	$49,541	$567,688
Total Commodity Cost	$3,081,930	$3,377,193	$6,862,594	$8,121,324	$7,323,081	$4,858,024	$5,384,548	$6,413,689	$4,123,337	$4,317,168	$3,976,729	$3,753,801	$61,593,419
Less: Offsystem Sales Purchases	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Net Commodity Cost	$3,081,930	$3,377,193	$6,862,594	$8,121,324	$7,323,081	$4,858,024	$5,384,548	$6,413,689	$4,123,337	$4,317,168	$3,976,729	$3,753,801	$61,593,419
Total Receipt Volume (Mcf)	1,541,440	2,144,639	1,292,788	2,208,360	2,377,365	2,199,960	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	22,264,169
Less: Total Shrinkage (Mcf)	12,515	14,320	21,316	26,086	23,479	17,667	18,730	12,845	6,984	6,734	6,734	6,624	174,031
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	1,528,925	2,130,320	1,271,472	2,182,274	2,353,887	2,182,293	1,466,387	1,959,396	2,400,279	1,569,915	1,575,501	1,469,489	22,090,138
Unit Storage Commodity Gas Cost ($/Mcf)													$2.7882

Notes:
1. Based on the PGC 2024 November Quarterly Filing
2. Using 1.051 Mcf/Dth conversion factor

C:\Users\bucholzb\AppData\Local\Microsoft\Windows\INetCache\Content.Outlook\O7GR4ALR\[Sto 11_24.xlsx]B

NFG Distribution Corporation
Inventory Cost Record as Booked
January 31, 2025
F:\Accounting\SOX Secured Files\Monthly Entries NFGDC\Monthly\STORAGE\Stor25\[Stor0125.xls]calc mcf

W/S B
Product 1902

	Current Month MCF	Rate	Amount	Since October 1st MCF	Rate *	Amount
UPDATE LINKS						
Balance Beginning of Period						
New York	A 17,309,054 ✓	1.1524 ✓	A $19,947,654.46 ✓	19,970,797 ✓	$1.2118 ✓	$24,200,576.02 ✓
Pennsylvania	6,947,588 ✓	0.6203 ✓	$4,309,836.80 ✓	8,155,231 ✓	$1.3200 ✓	$10,764,567.87 ✓
	24,256,642 ✓	1.0000 ✓	$24,257,491.26 ✓	28,126,028 ✓	1.2432 ✓	$34,965,143.89 ✓
Input - New York	11,962 ✓	B 1.6581 ✓	19,833.97 ✓	2,047,984 ✓	1.7481 ✓	3,580,043.46 ✓
- Pennsylvania	4,347 ✓	70.6307 ✓	307,031.78 ✓	819,987 ✓	5.6910 ✓	4,666,546.02 ✓
Output - New York	4,473,445 ✓	B 1.6581 ✓	7,417,334.68 ✓	9,171,210 ✓	1.6607 ✓	15,230,465.73 ✓
- Pennsylvania	2,279,611 ✓	5.9982 ✓	13,673,524.44 ✓	4,302,894 ✓	5.6910 ✓	24,487,769.75 ✓
Net - New York	(4,461,483) ✓	1.6581 ✓ $	(7,397,500.71) ✓	(7,123,226) ✓	1.6356 $	(11,650,422.27) ✓
Net - Pennsylvania	(2,275,264) ✓	5.8747 ✓ $	(13,366,492.66) ✓	(3,482,907) ✓	5.6910 $	(19,821,223.73) ✓
	(6,736,747) ✓	3.0822 ✓ $	(20,763,993.37) ✓	(10,606,133) ✓	2.9673 $	(31,471,646.00)
Loss	0	0.0000	0.00	0	0.0000	0.00
Balance End of Period to W/S C						
New York	D 12,847,571 ✓	$0.9769 ✓	$12,550,153.75 ✓	12,847,571 ✓	$0.9769 ✓	$12,550,153.75 ✓
Pennsylvania	4,672,324 ✓	($1.9384) ✓	($9,056,655.86) ✓	4,672,324 ✓	($1.9384) ✓	($9,056,655.86) ✓
TOTAL	17,519,895 ✓	$0.1994 ✓	$3,493,497.89 ✓	17,519,895 ✓	$0.1994 ✓	$3,493,497.89 ✓
* Rate per Valuation Department	12,847,571	0	0		-	OK
	4,672,324	0	0		-	OK

Michael Maggioli:
Updated 11/24

	UPDATE LINKS		Note: Links neede
	2,036,022	A 3,560,209	Do not use links for
	815,640	4,359,514	
	4,697,765	7,813,131	
	2,023,283	10,814,245	
NY	(2,661,743)	(4,252,921.56)	
PA	(1,207,643)	(6,454,731.07)	

Michael Maggioli:
10/31/24-
Updated with

UPDATE FIRST MONTH OF FISCAL YEAR

Gas Stored Underground YTD (9/30/2024)

New York	19,970,797	$	1.211798	$24,200,576.02
Pennsylvania	8,155,231	$	1.319959	10,764,567.87
	28,126,028	$	1.243160	$34,965,143.89

Gas Stored Underground Current

New York	12,847,571	$ 0.9769	12,550,153.75
Pennsylvania	4,672,324	$ (1.9384)	(9,056,655.86)
	17,519,895	$0.1994	$3,493,497.89

Balance Sheet Presentation

Gas Stored Underground Current (LIFO)				
New York	12,847,571	$0.9769	$12,550,153.75 ✓	
Pennsylvania	4,672,324	($1.9384)	($9,056,655.86) ✓	
Add: Reserve For Gas Replacement				
New York			(2,478,703.48) ✓	(Positive amount recorded to Account 253551 - Negative amount recorded to 591800)
Pennsylvania			12,719,377.68 ✓	(Positive amount recorded to Account 253552 - Negative amount recorded to 591800)
			10,240,674.20	
Gas Stored Underground Current	17,519,895	$0.7839	$13,734,172.09	Agrees to B/S a/c # 164100
New York	12,847,571 ✓	$0.7839	10,071,450.27 ✓	- OK
Pennsylvania	4,672,324 ✓	$0.7839	3,662,721.82 ✓	- OK
	17,519,895	$0.7839	$13,734,172.09 ✓	

Ties to layer rate table (next page)

Michael Maggioli:
Updated 11/24

	UPDATE LINKS		Note: Links neede
	Prior Month YTD		Do not use links for
	2,036,022	$ A 3,560,209.49	
	815,640	$ 4,359,514.24	
	2,851,662	7,919,724	
	4,697,765	$ 7,813,131.05	
	2,023,283	$ 10,814,245.31	
	6,721,048	18,627,376	

Purchased Gas Sold

	Mcf	Monthly	Dollars	Mcf	YTD	Dollars
Injections						
New York	11,962		19,833.97	2,047,984		3,580,043.46
Pennsylvania	4,347		307,031.78	819,987		4,666,546.02
	16,309		326,865.75	2,867,971		8,246,589.48
Withdrawals						
New York	4,473,445		7,417,334.68	9,171,210		15,230,465.73
Pennsylvania	2,279,611		13,673,524.44	4,302,894		24,487,769.75
	6,753,056		21,090,859.12	13,474,104		39,718,235.48

A = Agrees to prior month ending balance
B = Agrees to calculated NY Storage rate
C = Agrees to calculated PA Storage rate
D = Agrees to estimated ending storage inventory balance

NFG Distribution Corporation
Storage Gas Inventory Priced at Layer Rates
1/31/2025

W/S C
PRODUCT# 1902

**Please Note: First month following fiscal YE (Oct) when adding PY layer ensure that columns R-W are updated (copy & paste values) w/ PY ending balances (Sep 30 current month amounts at layer rates (X-AA). Also please note that formulas need to be reviewed & updated in rows V45-Z71 to ensure correct prior month reserve balance is referenced. The cell reference will shift due to added layer rate insert in Oct.

**Please Note: First month following fiscal YE (Oct)- Make sure to update the formulas of new years layer rate row for X,Y,Z,AA columns.

Layer Year	MCF 9/30/24 NY	MCF 9/30/24 PA	Layer Rate NY	Layer Rate PA	Amount 9/30/24 NY	Amount 9/30/24 PA	CURRENT MONTH MCF NY	CURRENT MONTH MCF PA	Amount at Layer Rates NY	Amount at Layer Rates PA
2025							-	-	-	-
2024	702,252	288,514	1.6447065	4.823600061	$ 1,154,998.42	$ 1,391,676.15	-	-	-	-
2023	92,382	-	1.6286354	0	$ 150,456.59	$ -	-	-	0.00	-
2022	-	-	0	0	$ -	$ -	-	-	0.00	-
2021	-	-	0	0	$ -	$ -	-	-	0.00	0.00
2020	551,946	497,240	1.4783043	3.7243000	$ 815,944.14	$ 1,851,870.93	0	0	0.00	0.00
2019	845,192	29,807	2.1754511	4.6127003	$ 1,838,673.90	$ 137,490.76	0	0	0.00	0.00
2018	455,033	-	2.5472239	0	$ 1,159,070.95	$ -	0	0	0.00	0.00
2017	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2016	-	150,371	0	3.8719000	$ -	$ 582,221.47	0	0	0.00	0.00
2015	-	153,235	1.5312976	4.1997000	$ -	$ 643,541.03	0	0	0.00	0.00
2014	-	122,940	0	6.0065144	$ -	$ 738,440.88	0	0	0.00	0.00
2013	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2012	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2011	517,091	-	4.9097543	0	$ 2,538,789.77	$ -	0	0	0.00	0.00
2010	500,421	-	5.2178791	0	$ 2,611,136.27	$ -	0	0	0.00	0.00
2007	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2003	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2002	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2001	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2000	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1999	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1997	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1996	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1995	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1994	391,383	-	3.7185166	3.7185166	$ 1,455,365.19	$ -	0	0	0.00	0.00
1993	15,915,097	6,913,124	0.7839186	0.7839186	$ 12,476,140.78	$ 5,419,326.65	12,847,571	4,672,324	10,071,450.27	3,662,722
	19,970,797	8,155,231	$ 1.21180	$ 1.31996	24,200,576.02	10,764,567.87	12,847,571	4,672,324	$ 10,071,450.27	$ 3,662,721.82
							Per W/S B	Per W/S B	Per W/S B	Per W/S B

Layers agree to 9/30/2024 file

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references- only if adding new row across the entire spreadsheet. FY 25 only added row within columns of table above so did not shift cell references.

Total volume = 17,519,895 mcf

Total = $13,734,172.09

Computation of Reserve for Gas Replacement

0.783918612

		PA	TOTAL	
Inventory at FIFO Basis		12,550,153.75	(9,056,655.86)	3,493,497.89 per W/S B
Inventory at Layer Rates		10,071,450.27	3,662,721.82	13,734,172.09
Required Reserve	Jan 31, 2025	$0.00	$12,719,377.68	$10,240,674.20
Required Reserve as of	Jan 31, 2025	$0.00	$12,719,377.68	$12,719,377.68
Required Reserve as of	Dec 31, 2024	$0.00	$1,316,498.36	$1,316,498.36 UPDATE
				LINK
Adjustment for Current Month		$0.00	$11,402,879.32	$11,402,879.32

NY: LIFO < FIFO

PA: LIFO > FIFO

Michael Maggioli: Oct: Make sure to update cell ref from shift due to layer rate add in above table.

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references.

Accounting Entry:

1774-164101	Gas Storage	$0.00
4776-164102	Gas Storage	11,402,879.32
1774-253551	Reserve for Gas Replacement	0.00
4776-253552	Reserve for Gas Replacement	(11,402,879.32)

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell

Accounting Entry (NY Only):

		Dr. / (Cr.)	
1774-164101	Gas Storage	$ (2,478,703.48)	
1774-591800	Gas Injected into Storage (pge)	2,478,703.48	
Booked prior month	12/31/24	$ (939,564.36)	UPDATE
NY Current Month Entry		(1,539,139.12)	LINK

-to adjust NY inventory balance for impact of negative reserve for gas replacement.

Accounting Entry (PA Only):

		Dr. / (Cr.)	
1774-164101	Gas Storage	$ -	
1774-591800	Gas Injected into Storage (pge)	-	
Booked prior month	12/31/24	$ -	UPDATE
PA Current Month Entry		-	LINK

-to adjust PA inventory balance for impact of negative reserve for gas replacement.

Michael Maggioli: This was adjusted during Oct ME to reflect that we did not book the .01 rounding in Sep 23. Make sure to back this formula

2/10/2025 3:53 PM

NY Rate - January 2025

$19,834/11,962 MCF = $1.66/mcf - NY RATE

Calculation of FYTD RATE to Produce the Monthly Storage Journal Entry for NFGDC-NY

		MCF - Month	$$ - Month	COMMODITY Rate - Month	MCF - FYTD	$$ - FYTD	Rate - FYTD	
								1
October-24	INJ	1,625,125	2,878,909	$ 1.77150	1,625,125	2,878,909	$ 1.77150	2
	W/D	(210,332)	(372,603)	$ 1.77150	(210,332)	(372,603)	$ 1.77150	3
	NET	1,414,793	2,506,306	$ 1.77150	1,414,793	2,506,306	$ 1.77150	4
November-24	INJ	375,892	623,259	$ 1.65808	2,001,017	3,502,168	$ 1.75019	5
	W/D	(1,346,381)	(2,232,409)	$ 1.65808	(1,556,713)	(2,605,012)	$ 1.67341	6
	NET	(970,489)	(1,609,149)	$ 1.65808	444,304	897,156	$ 2.01924	7
December-24	INJ	35,005	58,041	$ 1.65808	2,036,022	3,560,209	$ 1.74861	8
	W/D	(3,141,052)	(5,208,119)	$ 1.65808	(4,697,765)	(7,813,131)	$ 1.66316	9
	NET	(3,106,047)	(5,150,078)	$ 1.65808	(2,661,743)	(4,252,922)	$ 1.59780	10
January-25	INJ	11,962	19,834	$ 1.65808	2,047,984	3,580,043	$ 1.74808	11
	W/D	(4,473,445)	(7,417,335)	$ 1.65808	(9,171,210)	(15,230,466)	$ 1.66068	12
	NET	(4,461,483)	(7,397,501)	$ 1.65808	(7,123,226)	(11,650,422)	$ 1.63555	13
February-25	INJ		-	$ 1.65808	2,047,984	3,580,043	$ 1.74808	14
	W/D		-	$ 1.65808	(9,171,210)	(15,230,466)	$ 1.66068	15
	NET	-	-	$ -	(7,123,226)	(11,650,422)	$ 1.63555	16
March-25	INJ		-	$ 1.65808	2,047,984	3,580,043	$ 1.74808	17
	W/D		-	$ 1.65808	(9,171,210)	(15,230,466)	$ 1.66068	18
	NET	-	-	$ -	(7,123,226)	(11,650,422)	$ 1.63555	19
April-25	INJ		#N/A	#N/A	2,047,984	#N/A	#N/A	20
	W/D		#N/A	#N/A	(9,171,210)	#N/A	#N/A	21
	NET	-	#N/A	0	(7,123,226)	#N/A	#N/A	22
May-25	INJ		#N/A	#N/A	2,047,984	#N/A	#N/A	23
	W/D		#N/A	#N/A	(9,171,210)	#N/A	#N/A	24
	NET	-	#N/A	$ -	(7,123,226)	#N/A	#N/A	25
June-25	INJ		#N/A	#N/A	2,047,984	#N/A	#N/A	26
	W/D		#N/A	#N/A	(9,171,210)	#N/A	#N/A	27
	NET	-	#N/A	$ -	(7,123,226)	#N/A	#N/A	28
July-25	INJ		#N/A	#N/A	2,047,984	#N/A	#N/A	29
	W/D		#N/A	#N/A	(9,171,210)	#N/A	#N/A	30
	NET	-	#N/A	$ -	(7,123,226)	#N/A	#N/A	31
August-25	INJ		#N/A	#N/A	2,047,984	#N/A	#N/A	32
	W/D		#N/A	#N/A	(9,171,210)	#N/A	#N/A	33
	NET	-	#N/A	$ -	(7,123,226)	#N/A	#N/A	34
September-25	INJ		#N/A	#N/A	2,047,984	#N/A	#N/A	35
	W/D		#N/A	#N/A	(9,171,210)	#N/A	#N/A	36
	NET	-	#N/A	$ -	(7,123,226)	#N/A	#N/A	37
						#N/A		

Michael Maggioli:
Begg. In Nov and through April- Reminder to update formula to pull Weighted Avg Rate (7 columns) instead of Commodity Rate (3 columns).

Michael Maggioli:

Begg. In May and through October- Reminder to update formula to pull Commodity Rate (3 columns) instead of Weighted avg. Rate (7 columns).

To: M. Maggioli

From: C. Mann

Date: February 7, 2025

Re: PAD Storage Rates

The storage rates in effect for the 2nd Quarter of FY25 are derived as follows:

	($/Mcf) (a)
Demand	$2.5371
Commodity	$3.1539
Total	$5.6910

Qtrly PA Stroage Rates- Updated on Schedules Tab

Notes:
(1) Based on the PGC 2024 February Quarterly Filing of projected values.

(2) Using 1.051 Dth/Mcf conversion factor

(3) Storage Rates are derived at Delivered Volume to NFGDC with 3 months of actuals & 9 months of projections

cc:

N. Pasquarella
A. Riffel
M. Duszenko
L. Petko
L. Metzger
M. Maggioli
D. Koch
T. Wesoloski

National Fuel Gas Distribution Corporation
Pennsylvania Division
Unit Storage Gas Cost ($/Mcf)
For the Twelve Months Ending September 2025

Conversion Factor 1.051

	Actual Oct-24	Actual Nov-24	Actual Dec-24	Projected Jan-25	Projected Feb-25	Projected Mar-25	Projected Apr-25	Projected May-25	Projected Jun-25	Projected Jul-25	Projected Aug-25	Projected Sep-25	Total
Demand													
Upstream Purchased Gas Cost	$3,094,737	$3,118,166	$3,140,652	$3,127,909	$3,127,909	$3,122,864	$3,152,768	$3,147,742	$3,152,768	$3,152,768	$3,162,839	$3,172,910	$37,674,033
Appalachian Gas Cost	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Local Production Gas Cost	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Storage Rental & Transp. Cost	$1,225,420	$1,224,494	$1,223,784	$1,507,468	$1,507,468	$1,507,468	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$17,898,996
Total Demand Cost	$4,320,157	$4,342,660	$4,364,436	$4,635,377	$4,635,377	$4,630,332	$4,769,917	$4,764,891	$4,769,917	$4,769,917	$4,779,988	$4,790,059	$55,573,029
Less: Offsystem Sales Purchase	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Net Demand Cost	$4,320,157	$4,342,660	$4,364,436	$4,635,377	$4,635,377	$4,630,332	$4,769,917	$4,764,891	$4,769,917	$4,769,917	$4,779,988	$4,790,059	$55,573,029
Total Receipt Volume (Mcf)	1,647,462	1,206,400	1,983,960	2,208,360	2,377,365	2,199,960	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	22,123,125
Less: Total Shrinkage (Mcf)	30,308	23,041	39,473	26,086	23,479	17,667	18,730	12,845	6,984	6,734	6,734	6,624	218,703
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	-
(1) Storage Rates are derived at Delivered V	1,617,154	1,183,359	1,944,487	2,182,274	2,353,887	2,182,293	1,466,387	1,959,396	2,400,279	1,569,915	1,575,501	1,469,489	21,904,422
9 months of projected values.													
Unit Storage Demand Gas Cost ($/Mcf)													$2.5371
Commodity													
Upstream Purchased Gas Cost	$3,073,152	$2,700,516	$6,110,405	$8,230,670	$8,406,339	$5,149,589	$6,574,209	$7,924,858	$5,113,906	$5,315,381	$4,899,198	$4,726,132	$68,224,356
Appalachian Gas Cost	$0	$0	$0	$20,737	$23,431	$21,352	$20,234	$21,561	$22,486	$24,638	$24,837	$23,747	$203,023
Local Production Gas Cost	$23,183	$32,900	$45,973	$0	$0	$0	$0	$0	$0	$0	$0	$0	$102,056
Storage Rental & Transp. Cost	$30,208	$26,068	$49,580	$77,101	$59,404	$69,850	$3,589	$50,569	$48,914	$49,043	$44,207	$49,541	$558,074
Total Commodity Cost	$3,126,543	$2,759,484	$6,205,958	$8,328,508	$8,489,174	$5,240,791	$6,598,032	$7,996,988	$5,185,306	$5,389,062	$4,968,242	$4,799,420	$69,087,509
Less: Offsystem Sales Purchases	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Net Commodity Cost	$3,126,543	$2,759,484	$6,205,958	$8,328,508	$8,489,174	$5,240,791	$6,598,032	$7,996,988	$5,185,306	$5,389,062	$4,968,242	$4,799,420	$69,087,509
Total Receipt Volume (Mcf)	1,647,462	1,206,400	1,983,960	2,208,360	2,377,365	2,199,960	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	22,123,125
Less: Total Shrinkage (Mcf)	30,308	23,041	39,473	26,086	23,479	17,667	18,730	12,845	6,984	6,734	6,734	6,624	218,703
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	1,617,154	1,183,359	1,944,487	2,182,274	2,353,887	2,182,293	1,466,387	1,959,396	2,400,279	1,569,915	1,575,501	1,469,489	21,904,422
Unit Storage Commodity Gas Cost ($/Mcf)													$3.1539

Notes:
1. Based on the PGC 2024 February Quarterly Filing
2. Using 1.051 Mcf/Dth conversion factor
3. Storage rates are derived at Delivered Volume to NFGDC with 3 months of actuals & 9 months of projections

F:\RARA\Common\Accounting\Storage Rate\2025\[Sto 2_25.xlsx]B

NFG Distribution Corporation
Inventory Cost Record as Booked
February 28, 2025
F:\Accounting\SOX Secured Files\Monthly Entries NFGDC\Monthly\STORAGE\Stor25\[Stor0225.xls]calc mcf

W/S B
Product 1902

	Current Month MCF	Rate	Amount	Since October 1st MCF	Rate *	Amount
UPDATE LINKS						
Balance Beginning of Period						
New York	A 12,847,571 ✓	0.9769 ✓	A $12,550,153.75 ✓	19,970,797 ✓	$1.2118 ✓	$24,200,576.02 ✓
Pennsylvania	4,672,324 ✓	(1.9384) ✓	($9,056,655.86) ✓	8,155,231 ✓	$1.3200 ✓	$10,764,567.87 ✓
	17,519,895 ✓	0.1994 ✓	$3,493,497.89 ✓	28,126,028 ✓	1.2432 ✓	$34,965,143.89 ✓
Input - New York	165,131 ✓	B 1.6581 ✓	273,800.59 ✓	2,213,115 ✓	1.7414 ✓	3,853,844.05 ✓
- Pennsylvania	11,090 ✓	5.6910 ✓	63,113.19 ✓	831,077 ✓	C 5.6910 ✓	4,729,659.21 ✓
Output - New York	4,310,008 ✓	B 1.6581 ✓	7,146,342.87 ✓	13,481,218 ✓	1.6599 ✓	22,376,808.60 ✓
- Pennsylvania	1,499,223 ✓	5.6910 ✓	8,532,078.10 ✓	5,802,117 ✓	C 5.6910 ✓	33,019,847.85 ✓
Net - New York	(4,144,877) ✓	1.6581	$ (6,872,542.28) ✓	(11,268,103)	1.6438	$ (18,522,964.55) ✓
Net - Pennsylvania	(1,488,133) ✓	5.6910	$ (8,468,964.91) ✓	(4,971,040)	5.6910	$ (28,290,188.64) ✓
	(5,633,010) ✓	2.7235	$ (15,341,507.19) ✓	(16,239,143)	2.8827	$ (46,813,153.19) ✓
Loss	0	0.0000	0.00	0	0.0000	0.00
Balance End of Period to W/S C						
New York	D 8,702,694 ✓	$0.6524 ✓	$5,677,611.47 ✓	8,702,694	$0.6524 ✓	$5,677,611.47 ✓
Pennsylvania	3,184,191 ✓	($5.5039) ✓	($17,525,620.77) ✓	3,184,191	($5.5039) ✓	($17,525,620.77) ✓
TOTAL	11,886,885 ✓	($0.9967) ✓	($11,848,009.30) ✓	11,886,885	($0.9967) ✓	($11,848,009.30) ✓
* Rate per Valuation Department	8,702,694	0	0		-	OK
	3,184,191	0	0		-	OK

Michael Maggioli:
Updated 11/24

UPDATE LINKS		Note: Links neede
A 2,047,984	A 3,580,043	Do not use links for
819,987	4,666,546	
9,171,210	15,230,466	
4,302,894	24,487,769	
NY (7,123,226)	(11,650,422.27)	
PA (3,482,907)	(19,821,223.73)	

Michael Maggioli:
10/31/24- Updated with 9/30/24 balances

UPDATE FIRST MONTH OF FISCAL YEAR

Gas Stored Underground YTD (9/30/2024)

New York	19,970,797	$	1.211798	$24,200,576.02
Pennsylvania	8,155,231	$	1.319959	10,764,567.87
	28,126,028	$	1.243160	$34,965,143.89

Gas Stored Underground Current

New York	8,702,694	$ 0.6524	5,677,611.47
Pennsylvania	3,184,191	$ (5.5039)	(17,525,620.77)
	11,886,885	($0.9967)	($11,848,009.30)

Balance Sheet Presentation

Gas Stored Underground Current (LIFO)				
New York	8,702,694	$0.6524	$5,677,611.47 ✓	
Pennsylvania	3,184,191	($5.5039)	($17,525,620.77) ✓	
Add: Reserve For Gas Replacement				
New York			1,144,592.58 ✓	(Positive amount recorded to Account 253551 - Negative amount recorded to 591800)
Pennsylvania			20,021,767.44 ✓	(Positive amount recorded to Account 253552 - Negative amount recorded to 591800)
			21,166,360.02	
Gas Stored Underground Current	11,886,885	$0.7839	$9,318,350.72	Agrees to B/S a/c # 164100
New York	8,702,694 ✓	$0.7839	6,822,204.05 ✓	- OK
Pennsylvania	3,184,191 ✓	$0.7839	2,496,146.67 ✓	- OK
	11,886,885 ✓	$0.7839	$9,318,350.72 ✓	

Ties to layer rate table (next page)

Michael Maggioli:
Updated 11/24

UPDATE LINKS		Note: Links neede
Prior Month YTD		Do not use links for
A 2,047,984	$ A 3,580,043.46	
819,987	$ 4,666,546.02	
2,867,971	8,246,589	
9,171,210	$ 15,230,466.73	
4,302,894	$ 24,487,769.75	
13,474,104	39,718,235	

Purchased Gas Sold	Mcf	Monthly	Dollars	Mcf	YTD	Dollars
Injections						
New York	165,131		273,800.59	2,213,115		3,853,844.05
Pennsylvania	11,090		63,113.19	831,077		4,729,659.21
	176,221		336,913.78	3,044,192		8,583,503.26
Withdrawals						
New York	4,310,008		7,146,342.87	13,481,218		22,376,808.60
Pennsylvania	1,499,223		8,532,078.10	5,802,117		33,019,847.85
	5,809,231		15,678,420.97	19,283,335		55,396,656.45

A = Agrees to prior month ending balance
B = Agrees to calculated NY Storage rate
C = Agrees to calculated PA Storage rate
D = Agrees to estimated ending storage inventory balance

3/11/2025 12:52 PM

NFG Distribution Corporation
Storage Gas Inventory Priced at Layer Rates
2/28/2025

W/S C
PRODUCT# 1902

**Please Note: First month following fiscal YE (Oct) when adding PY layer ensure that columns R-W are updated (copy & paste values) w/ PY ending balances (Sep 30 current month amounts at layer rates (X-AA). Also please note that formulas need to be reviewed & updated in rows V45-Z71 to ensure correct prior month reserve balance is referenced. The cell reference will shift due to added layer rate insert in Oct.

**Please Note: First month following fiscal YE (Oct)- Make sure to update the formulas of new years layer rate row for X,Y,Z,AA columns.

Layer Year	MCF 9/30/24 NY	MCF 9/30/24 PA	Layer Rate NY	Layer Rate PA	Amount 9/30/24 NY	Amount 9/30/24 PA	CURRENT MONTH MCF NY	CURRENT MONTH MCF PA	CURRENT MONTH Amount at Layer Rates NY	CURRENT MONTH Amount at Layer Rates PA
2025							-	-	-	-
2024	702,252	288,514	1.6447065	4.823600061	$ 1,154,998.42	$ 1,391,676.15	-	-	-	-
2023	92,382	-	1.6286354	0	$ 150,456.59	$ -	-	-	0.00	-
2022	-	-	0	0	$ -	$ -	-	-	0.00	-
2021	-	-	0	0	$ -	$ -	-	-	0.00	0.00
2020	551,946	497,240	1.4783043	3.7243000	$ 815,944.14	$ 1,851,870.93	0	0	0.00	0.00
2019	845,192	29,807	2.1754511	4.6127003	$ 1,838,673.90	$ 137,490.76	0	0	0.00	0.00
2018	455,033	-	2.5472239	0	$ 1,159,070.95	$ -	0	0	0.00	0.00
2017	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2016	-	150,371	0	3.8719000	$ -	$ 582,221.47	0	0	0.00	0.00
2015	-	153,235	1.5312976	4.1997000	$ -	$ 643,541.03	0	0	0.00	0.00
2014	-	122,940	0	6.0065144	$ -	$ 738,440.88	0	0	0.00	0.00
2013	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2012	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2011	517,091	-	4.9097543	0	$ 2,538,789.77	$ -	0	0	0.00	0.00
2010	500,421	-	5.2178791	0	$ 2,611,136.27	$ -	0	0	0.00	0.00
2007	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2003	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2002	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2001	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2000	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1999	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1997	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1996	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1995	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1994	391,383	-	3.7185166	3.7185166	$ 1,455,365.19	$ -	0	0	0.00	0.00
1993	15,915,097	6,913,124	0.7839186	0.7839186	$ 12,476,140.78	$ 5,419,326.65	8,702,694	3,184,191	6,822,204.05	2,496,147
	19,970,797	8,155,231	$ 1.21180	$ 1.31996	24,200,576.02	10,764,567.87	8,702,694	3,184,191	$ 6,822,204.05	$ 2,496,146.67
							Per W/S B	Per W/S B	Per W/S B	Per W/S B

Layers agree to 9/30/2024 file

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references- only if adding new row across the entire spreadsheet. FY 25 only added row within columns of table above so did not shift cell references.

Computation of Reserve for Gas Replacement

0.783918612

		NY	PA	TOTAL	
Inventory at FIFO Basis		5,677,611.47	(17,525,620.77)	(11,848,009.30)	per W/S B
Inventory at Layer Rates		6,822,204.05	2,496,146.67	9,318,350.72	
Required Reserve	Feb 28, 2025	$1,144,592.58	$20,021,767.44	$21,166,360.02	
Required Reserve as of	Feb 28, 2025	$1,144,592.58	$20,021,767.44	$21,166,360.02	
Required Reserve as of	Jan 31, 2025	$0.00	$12,719,377.68	$12,719,377.68	UPDATE LINK
Adjustment for Current Month		$1,144,592.58	$7,302,389.76	$8,446,982.34	

NY & PA: LIFO > FIFO

Michael Maggioli: Oct: Make sure to update cell ref from shift due to layer rate add in above table.

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references.

Accounting Entry:

1774-164101	Gas Storage	$1,144,592.58
4776-164102	Gas Storage	7,302,389.76
1774-253551	Reserve for Gas Replacement	(1,144,592.58)
4776-253552	Reserve for Gas Replacement	(7,302,389.76)

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references.

Accounting Entry (NY Only):

			Dr. / (Cr.)	
1774-164101	Gas Storage		$ -	
1774-591800	Gas Injected into Storage (pge)		-	
Booked prior month		1/31/25	$ (2,478,703.48)	UPDATE
NY Current Month Entry			2,478,703.48	LINK

-to adjust NY inventory balance for impact of negative reserve for gas replacement.

Accounting Entry (PA Only):

			Dr. / (Cr.)	
1774-164101	Gas Storage		$ -	
1774-591800	Gas Injected into Storage (pge)		-	
Booked prior month		1/31/25	$ -	UPDATE
PA Current Month Entry			-	LINK

-to adjust PA inventory balance for impact of negative reserve for gas replacement.

Michael Maggioli: This was adjusted during Oct ME to reflect that we did not book the .01 rounding in Sep 23. Make sure to back this formula out in Nov 23.

3/11/2025 12:52 PM

NY Rate - February 2025

$273,801/165,131 MCF = $1.66/mcf - NY RATE

Calculation of FYTD RATE to Produce the Monthly Storage Journal Entry for NFGDC-NY

		MCF - Month	$$ - Month	COMMODITY Rate - Month	MCF - FYTD	$$ - FYTD	Rate - FYTD	
								1
October-24	INJ	1,625,125	2,878,909	$ 1.77150	1,625,125	2,878,909	$ 1.77150	2
	W/D	(210,332)	(372,603)	$ 1.77150	(210,332)	(372,603)	$ 1.77150	3
	NET	1,414,793	2,506,306	$ 1.77150	1,414,793	2,506,306	$ 1.77150	4
November-24	INJ	375,892	623,259	$ 1.65808	2,001,017	3,502,168	$ 1.75019	5
	W/D	(1,346,381)	(2,232,409)	$ 1.65808	(1,556,713)	(2,605,012)	$ 1.67341	6
	NET	(970,489)	(1,609,149)	$ 1.65808	444,304	897,156	$ 2.01924	7
December-24	INJ	35,005	58,041	$ 1.65808	2,036,022	3,560,209	$ 1.74861	8
	W/D	(3,141,052)	(5,208,119)	$ 1.65808	(4,697,765)	(7,813,131)	$ 1.66316	9
	NET	(3,106,047)	(5,150,078)	$ 1.65808	(2,661,743)	(4,252,922)	$ 1.59780	10
January-25	INJ	11,962	19,834	$ 1.65808	2,047,984	3,580,043	$ 1.74808	11
	W/D	(4,473,445)	(7,417,335)	$ 1.65808	(9,171,210)	(15,230,466)	$ 1.66068	12
	NET	(4,461,483)	(7,397,501)	$ 1.65808	(7,123,226)	(11,650,422)	$ 1.63555	13
February-25	INJ	165,131	273,801	$ 1.65808	2,213,115	3,853,844	$ 1.74137	14
	W/D	(4,310,008)	(7,146,343)	$ 1.65808	(13,481,218)	(22,376,809)	$ 1.65985	15
	NET	(4,144,877)	(6,872,542)	$ 1.65808	(11,268,103)	(18,522,965)	$ 1.64384	16
March-25	INJ		-	$ 1.65808	2,213,115	3,853,844	$ 1.74137	17
	W/D		-	$ 1.65808	(13,481,218)	(22,376,809)	$ 1.65985	18
	NET	-	-	$ -	(11,268,103)	(18,522,965)	$ 1.64384	19
April-25	INJ		#N/A	#N/A	2,213,115	#N/A	#N/A	20
	W/D		#N/A	#N/A	(13,481,218)	#N/A	#N/A	21
	NET	-	#N/A	0	(11,268,103)	#N/A	#N/A	22
May-25	INJ		#N/A	#N/A	2,213,115	#N/A	#N/A	23
	W/D		#N/A	#N/A	(13,481,218)	#N/A	#N/A	24
	NET	-	#N/A	$ -	(11,268,103)	#N/A	#N/A	25
June-25	INJ		#N/A	#N/A	2,213,115	#N/A	#N/A	26
	W/D		#N/A	#N/A	(13,481,218)	#N/A	#N/A	27
	NET	-	#N/A	$ -	(11,268,103)	#N/A	#N/A	28
July-25	INJ		#N/A	#N/A	2,213,115	#N/A	#N/A	29
	W/D		#N/A	#N/A	(13,481,218)	#N/A	#N/A	30
	NET	-	#N/A	$ -	(11,268,103)	#N/A	#N/A	31
August-25	INJ		#N/A	#N/A	2,213,115	#N/A	#N/A	32
	W/D		#N/A	#N/A	(13,481,218)	#N/A	#N/A	33
	NET	-	#N/A	$ -	(11,268,103)	#N/A	#N/A	34
September-25	INJ		#N/A	#N/A	2,213,115	#N/A	#N/A	35
	W/D		#N/A	#N/A	(13,481,218)	#N/A	#N/A	36
	NET	-	#N/A	$ -	(11,268,103)	#N/A	#N/A	37

Michael Maggioli:
Begg. In Nov and through April- Reminder to update formula to pull Weighted Avg Rate (7 columns) instead of Commodity Rate (3 columns).

Michael Maggioli:

Begg. In May and through October- Reminder to update formula to pull Commodity Rate (3 columns) instead of Weighted avg. Rate (7 columns).

PA Rate - Q2 2025

To: M. Maggioli

From: C. Mann

Date: February 7, 2025

Re: PAD Storage Rates

The storage rates in effect for the 2nd Quarter of FY25 are derived as follows:

	($/Mcf) (a)
Demand	$2.5371
Commodity	$3.1539
Total	$5.6910

Qtrly PA Stroage Rates- Updated on Schedules Tab

Notes:
(1) Based on the PGC 2024 February Quarterly Filing of projected values.

(2) Using 1.051 Dth/Mcf conversion factor

(3) Storage Rates are derived at Delivered Volume to NFGDC with 3 months of actuals & 9 months of projections

cc:
N. Pasquarella
A. Riffel
M. Duszenko
L. Petko
L. Metzger
M. Maggioli
D. Koch
T. Wesoloski

National Fuel Gas Distribution Corporation
Pennsylvania Division
Unit Storage Gas Cost ($/Mcf)
For the Twelve Months Ending September 2025

Conversion Factor **1.051**

	Actual Oct-24	Actual Nov-24	Actual Dec-24	Projected Jan-25	Projected Feb-25	Projected Mar-25	Projected Apr-25	Projected May-25	Projected Jun-25	Projected Jul-25	Projected Aug-25	Projected Sep-25	Total
Demand													
Upstream Purchased Gas Cost	$3,094,737	$3,118,166	$3,140,652	$3,127,909	$3,127,909	$3,122,864	$3,152,768	$3,147,742	$3,152,768	$3,152,768	$3,162,839	$3,172,910	$37,674,033
Appalachian Gas Cost	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Local Production Gas Cost	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Storage Rental & Transp. Cost	$1,225,420	$1,224,494	$1,223,784	$1,507,468	$1,507,468	$1,507,468	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$17,898,996
Total Demand Cost	$4,320,157	$4,342,660	$4,364,436	$4,635,377	$4,635,377	$4,630,332	$4,769,917	$4,764,891	$4,769,917	$4,769,917	$4,779,988	$4,790,059	$55,573,029
Less: Offsystem Sales Purchase	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Net Demand Cost	$4,320,157	$4,342,660	$4,364,436	$4,635,377	$4,635,377	$4,630,332	$4,769,917	$4,764,891	$4,769,917	$4,769,917	$4,779,988	$4,790,059	$55,573,029
Total Receipt Volume (Mcf)	1,647,462	1,206,400	1,983,960	2,208,360	2,377,365	2,199,960	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	22,123,125
Less: Total Shrinkage (Mcf)	30,308	23,041	39,473	26,086	23,479	17,667	18,730	12,845	6,984	6,734	6,734	6,624	218,703
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	-
(1) Storage Rates are derived at Delivered V	1,617,154	1,183,359	1,944,487	2,182,274	2,353,887	2,182,293	1,466,387	1,959,396	2,400,279	1,569,915	1,575,501	1,469,489	21,904,422
9 months of projected values.													
Unit Storage Demand Gas Cost ($/Mcf)													$2.5371
Commodity													
Upstream Purchased Gas Cost	$3,073,152	$2,700,516	$6,110,405	$8,230,670	$8,406,339	$5,149,589	$6,574,209	$7,924,858	$5,113,906	$5,315,381	$4,899,198	$4,726,132	$68,224,356
Appalachian Gas Cost	$0	$0	$0	$20,737	$23,431	$21,352	$20,234	$21,561	$22,486	$24,638	$24,837	$23,747	$203,023
Local Production Gas Cost	$23,183	$32,900	$45,973	$0	$0	$0	$0	$0	$0	$0	$0	$0	$102,056
Storage Rental & Transp. Cost	$30,208	$26,068	$49,580	$77,101	$59,404	$69,850	$3,589	$50,569	$48,914	$49,043	$44,207	$49,541	$558,074
Total Commodity Cost	$3,126,543	$2,759,484	$6,205,958	$8,328,508	$8,489,174	$5,240,791	$6,598,032	$7,996,988	$5,185,306	$5,389,062	$4,968,242	$4,799,420	$69,087,509
Less: Offsystem Sales Purchases	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Net Commodity Cost	$3,126,543	$2,759,484	$6,205,958	$8,328,508	$8,489,174	$5,240,791	$6,598,032	$7,996,988	$5,185,306	$5,389,062	$4,968,242	$4,799,420	$69,087,509
Total Receipt Volume (Mcf)	1,647,462	1,206,400	1,983,960	2,208,360	2,377,365	2,199,960	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	22,123,125
Less: Total Shrinkage (Mcf)	30,308	23,041	39,473	26,086	23,479	17,667	18,730	12,845	6,984	6,734	6,734	6,624	218,703
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	1,617,154	1,183,359	1,944,487	2,182,274	2,353,887	2,182,293	1,466,387	1,959,396	2,400,279	1,569,915	1,575,501	1,469,489	21,904,422
Unit Storage Commodity Gas Cost ($/Mcf)													$3.1539

Notes:
1. Based on the PGC 2024 February Quarterly Filing
2. Using 1.051 Mcf/Dth conversion factor
3. Storage rates are derived at Delivered Volume to NFGDC with 3 months of actuals & 9 months of projections

F:\RARA\Common\Accounting\Storage Rate\2025\[Sto 2_25.xlsx]B

NFG Distribution Corporation
Inventory Cost Record as Booked
March 31, 2025
F:\Accounting\SOX Secured Files\Monthly Entries NFGDC\Monthly\STORAGE\Stor25\[Stor0325.xls]calc mcf

W/S B
Product 1902

	Current Month MCF	Rate	Amount	Since October 1st MCF	Rate *	Amount
UPDATE LINKS						
Balance Beginning of Period						
New York	A 8,702,694 ✓	0.6524 ✓	A $5,677,611.47 ✓	19,970,797 ✓	$1.2118 ✓	$24,200,576.02 ✓
Pennsylvania	3,184,191 ✓	(5.5039) ✓	($17,525,620.77) ✓	8,155,231 ✓	$1.3200 ✓	$10,764,567.87 ✓
	11,886,885 ✓	(0.9967) ✓	($11,848,009.30) ✓	28,126,028 ✓	1.2432 ✓	$34,965,143.89 ✓
Input - New York	103,589 ✓	B 1.6581 ✓	$171,758.97 ✓	2,316,704 ✓	1.7376 ✓	$4,025,603.02 ✓
- Pennsylvania	104,117 ✓	5.6910 ✓	$592,529.84 ✓	935,194 ✓	C 5.6910 ✓	$5,322,189.05 ✓
Output - New York	3,013,907 ✓	B 1.6581 ✓	$4,997,302.28 ✓	16,495,125 ✓	1.6595 ✓	$27,374,110.88 ✓
- Pennsylvania	899,592 ✓	5.6910 ✓	$5,119,578.07 ✓	6,701,709 ✓	C 5.6910 ✓	$38,139,425.92 ✓
Net - New York	(2,910,318) ✓	1.6581	($4,825,543.31) ✓	(14,178,421) ✓	1.6468	($23,348,507.86)
Net - Pennsylvania	(795,475) ✓	5.6910	($4,527,048.23) ✓	(5,766,515) ✓	5.6910	($32,817,236.87)
	(3,705,793) ✓	2.5238	($9,352,591.54) ✓	(19,944,936) ✓	2.8160	($56,165,744.73)
Loss	0	0.0000	0.00	0	0.0000	0.00
Balance End of Period to W/S C						
New York	D 5,792,376 ✓	$0.1471 ✓	$852,068.16 ✓	5,792,376 ✓	$0.1471 ✓	$852,068.16 ✓
Pennsylvania	2,388,716 ✓	($9.2320) ✓	($22,052,669.00) ✓	2,388,716 ✓	($9.2320) ✓	($22,052,669.00) ✓
TOTAL	8,181,092 ✓	($2.5914) ✓	($21,200,600.84) ✓	8,181,092 ✓	($2.5914) ✓	($21,200,600.84) ✓
* Rate per Valuation Department	5,792,376	0	0			- OK
	2,388,716	0	0			- OK

Michael Maggioli:
Updated 11/24

UPDATE LINKS		Note: Links neede
A 2,213,115	A 3,853,844	Do not use links for
831,077	4,729,659	
13,481,218	22,376,809	
5,802,117	33,019,848	
NY (11,268,103)	(18,522,964.55)	
PA (4,971,040)	(28,290,188.64)	

Michael Maggioli:
10/31/24- Updated with 9/30/24 balances

UPDATE FIRST MONTH OF FISCAL YEAR

Gas Stored Underground YTD (9/30/2024)

New York	19,970,797	$	1.211798	$24,200,576.02
Pennsylvania	8,155,231	$	1.319959	10,764,567.87
	28,126,028	$	1.243160	$34,965,143.89

Gas Stored Underground Current

New York	5,792,376	$	0.1471	$852,068.16
Pennsylvania	2,388,716	$	(9.2320)	($22,052,669.00)
	8,181,092		($2.5914)	($21,200,600.84)

Balance Sheet Presentation

Gas Stored Underground Current (LIFO)				
New York	5,792,376	$0.1471	$852,068.16 ✓	
Pennsylvania	2,388,716	($9.2320)	($22,052,669.00) ✓	
Add: Reserve For Gas Replacement				
New York			$3,688,683.44 ✓	(Positive amount recorded to Account 253551 - Negative amount recorded to 591800)
Pennsylvania			$23,925,228.01 ✓	(Positive amount recorded to Account 253552 - Negative amount recorded to 591800)
			$27,613,911.45	
Gas Stored Underground Current	8,181,092	$0.7839	$6,413,310.61	Agrees to B/S a/c # 164100
New York	5,792,376	$0.7839	$4,540,751.60 ✓	- OK
Pennsylvania	2,388,716	$0.7839	$1,872,559.01 ✓	- OK
	8,181,092	$0.7839	$6,413,310.61 ✓	

Ties to layer rate table (next page)

Michael Maggioli:
Updated 11/24

UPDATE LINKS		Note: Links neede
Prior Month YTD		Do not use links for
A 2,213,115	$ A 3,853,844.05	
831,077	$ 4,729,659.21	
3,044,192	$ 8,583,503.26	
13,481,218	$ 22,376,808.60	
5,802,117	$ 33,019,947.85	
19,283,335	$ 55,396,656.45	

Purchased Gas Sold	Mcf	Monthly	Dollars	Mcf	YTD	Dollars
Injections						
New York	103,589		$171,758.97	2,316,704		$4,025,603.02
Pennsylvania	104,117		$592,529.84	935,194		$5,322,189.05
	207,706		$764,288.81	3,251,898		$9,347,792.07
Withdrawals						
New York	3,013,907		$4,997,302.28	16,495,125		$27,374,110.88
Pennsylvania	899,592		$5,119,578.07	6,701,709		$38,139,425.92
	3,913,499		$10,116,880.35	23,196,834		$65,513,536.80

A = Agrees to prior month ending balance
B = Agrees to calculated NY Storage rate
C = Agrees to calculated PA Storage rate
D = Agrees to estimated ending storage inventory balance

4/4/2025 3:07 PM

NFG Distribution Corporation
Storage Gas Inventory Priced at Layer Rates
3/31/2025

W/S C
PRODUCT# 1902

**Please Note: First month following fiscal YE (Oct) when adding PY layer ensure that columns R-W are updated (copy & paste values) w/ PY ending balances (Sep 30 current month amounts at layer rates (X-AA). Also please note that formulas need to be reviewed & updated in rows V45-Z71 to ensure correct prior month reserve balance is referenced. The cell reference will shift due to added layer rate insert in Oct.

**Please Note: First month following fiscal YE (Oct)- Make sure to update the formulas of new years layer rate row for X,Y,Z,AA columns.

Layer Year	MCF 9/30/24 NY	MCF 9/30/24 PA	Layer Rate NY	Layer Rate PA	Amount 9/30/24 NY	Amount 9/30/24 PA	CURRENT MONTH MCF NY	CURRENT MONTH MCF PA	CURRENT MONTH Amount at Layer Rates NY	CURRENT MONTH Amount at Layer Rates PA
2025							-	-	-	-
2024	702,252	288,514	1.6447065	4.823600061	$ 1,154,998.42	$ 1,391,676.15	-	-	-	-
2023	92,382	-	1.6286354	0	$ 150,456.59	$ -	-	-	0.00	-
2022	-	-	0	0	$ -	$ -	-	-	0.00	-
2021	-	-	0	0	$ -	$ -	-	-	0.00	0.00
2020	551,946	497,240	1.4783043	3.7243000	$ 815,944.14	$ 1,851,870.93	0	0	0.00	0.00
2019	845,192	29,807	2.1754511	4.6127003	$ 1,838,673.90	$ 137,490.76	0	0	0.00	0.00
2018	455,033	-	2.5472239	0	$ 1,159,070.95	$ -	0	0	0.00	0.00
2017	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2016	-	150,371	0	3.8719000	$ -	$ 582,221.47	0	0	0.00	0.00
2015	-	153,235	1.5312976	4.1997000	$ -	$ 643,541.03	0	0	0.00	0.00
2014	-	122,940	0	6.0065144	$ -	$ 738,440.88	0	0	0.00	0.00
2013	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2012	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2011	517,091	-	4.9097543	0	$ 2,538,789.77	$ -	0	0	0.00	0.00
2010	500,421	-	5.2178791	0	$ 2,611,136.27	$ -	0	0	0.00	0.00
2007	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2003	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2002	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2001	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2000	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1999	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1997	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1996	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1995	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1994	391,383	-	3.7185166	3.7185166	$ 1,455,365.19	$ -	0	0	0.00	0.00
1993	15,915,097	6,913,124	0.7839186	0.7839186	$ 12,476,140.78	$ 5,419,326.65	5,792,376	2,388,716	4,540,751.60	1,872,559
	19,970,797	8,155,231	$ 1.21180	$ 1.31996	24,200,576.02	10,764,567.87	5,792,376	2,388,716	$ 4,540,751.60	$ 1,872,559.01
							Per W/S B	Per W/S B	Per W/S B	Per W/S B

Layers agree to 9/30/2024 file

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references- only if adding new row across the entire spreadsheet. FY 25 only added row within columns of table above so did not shift cell references.

Computation of Reserve for Gas Replacement

0.783918612

		NY	PA	TOTAL	
Inventory at FIFO Basis		852,068.16	(22,052,669.00)	(21,200,600.84)	per W/S B
Inventory at Layer Rates		4,540,751.60	1,872,559.01	6,413,310.61	
Required Reserve	Mar 31, 2025	$3,688,683.44	$23,925,228.01	$27,613,911.45	
Required Reserve as of	Mar 31, 2025	$3,688,683.44	$23,925,228.01	$27,613,911.45	
Required Reserve as of	Feb 28, 2025	$1,144,592.58	$20,021,757.44	$21,166,360.02	UPDATE LINK
Adjustment for Current Month		$2,544,090.86	$3,903,460.57	$6,447,551.43	

NY & PA: LIFO > FIFO

Michael Maggioli: Oct: Make sure to update cell ref from shift due to layer rate add in above table.

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references.

Accounting Entry:

1774-164101	Gas Storage	$2,544,090.86
4776-164102	Gas Storage	3,903,460.57
1774-253551	Reserve for Gas Replacement	(2,544,090.86)
4776-253552	Reserve for Gas Replacement	(3,903,460.57)

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references.

Accounting Entry (NY Only):

		Dr. / (Cr.)	
1774-164101	Gas Storage	$ -	
1774-591800	Gas Injected into Storage (pge)	-	
Booked prior month	2/28/25	$ -	UPDATE
NY Current Month Entry		-	LINK

-to adjust NY inventory balance for impact of negative reserve for gas replacement.

Accounting Entry (PA Only):

		Dr. / (Cr.)	
1774-164101	Gas Storage	$ -	
1774-591800	Gas Injected into Storage (pge)	-	
Booked prior month	2/28/25	$ -	UPDATE
PA Current Month Entry		-	LINK

-to adjust PA inventory balance for impact of negative reserve for gas replacement.

Michael Maggioli: This was adjusted during Oct ME to reflect that we did not book the .01 rounding in Sep 23. Make sure to back this formula out in Nov 23.

NY Rate - March 2025

$171,759/103,589 MCF = $1.66/mcf - NY RATE

Calculation of FYTD RATE to Produce the Monthly Storage Journal Entry for NFGDC-NY

		MCF - Month	$$ - Month	COMMODITY Rate - Month	MCF - FYTD	$$ - FYTD	Rate - FYTD	
								1
October-24	INJ	1,625,125	2,878,909	$ 1.77150	1,625,125	2,878,909	$ 1.77150	2
	W/D	(210,332)	(372,603)	$ 1.77150	(210,332)	(372,603)	$ 1.77150	3
	NET	1,414,793	2,506,306	$ 1.77150	1,414,793	2,506,306	$ 1.77150	4
November-24	INJ	375,892	623,259	$ 1.65808	2,001,017	3,502,168	$ 1.75019	5
	W/D	(1,346,381)	(2,232,409)	$ 1.65808	(1,556,713)	(2,605,012)	$ 1.67341	6
	NET	(970,489)	(1,609,149)	$ 1.65808	444,304	897,156	$ 2.01924	7
December-24	INJ	35,005	58,041	$ 1.65808	2,036,022	3,560,209	$ 1.74861	8
	W/D	(3,141,052)	(5,208,119)	$ 1.65808	(4,697,765)	(7,813,131)	$ 1.66316	9
	NET	(3,106,047)	(5,150,078)	$ 1.65808	(2,661,743)	(4,252,922)	$ 1.59780	10
January-25	INJ	11,962	19,834	$ 1.65808	2,047,984	3,580,043	$ 1.74808	11
	W/D	(4,473,445)	(7,417,335)	$ 1.65808	(9,171,210)	(15,230,466)	$ 1.66068	12
	NET	(4,461,483)	(7,397,501)	$ 1.65808	(7,123,226)	(11,650,422)	$ 1.63555	13
February-25	INJ	165,131	273,801	$ 1.65808	2,213,115	3,853,844	$ 1.74137	14
	W/D	(4,310,008)	(7,146,343)	$ 1.65808	(13,481,218)	(22,376,809)	$ 1.65985	15
	NET	(4,144,877)	(6,872,542)	$ 1.65808	(11,268,103)	(18,522,965)	$ 1.64384	16
March-25	INJ	103,589	171,759	$ 1.65808	2,316,704	4,025,603	$ 1.73764	17
	W/D	(3,013,907)	(4,997,302)	$ 1.65808	(16,495,125)	(27,374,111)	$ 1.65953	18
	NET	(2,910,318)	(4,825,543)	$ 1.65808	(14,178,421)	(23,348,508)	$ 1.64676	19
April-25	INJ		#N/A	#N/A	2,316,704	#N/A	#N/A	20
	W/D		#N/A	#N/A	(16,495,125)	#N/A	#N/A	21
	NET	-	#N/A	0	(14,178,421)	#N/A	#N/A	22
May-25	INJ		#N/A	#N/A	2,316,704	#N/A	#N/A	23
	W/D		#N/A	#N/A	(16,495,125)	#N/A	#N/A	24
	NET	-	#N/A	$ -	(14,178,421)	#N/A	#N/A	25
June-25	INJ		#N/A	#N/A	2,316,704	#N/A	#N/A	26
	W/D		#N/A	#N/A	(16,495,125)	#N/A	#N/A	27
	NET	-	#N/A	$ -	(14,178,421)	#N/A	#N/A	28
July-25	INJ		#N/A	#N/A	2,316,704	#N/A	#N/A	29
	W/D		#N/A	#N/A	(16,495,125)	#N/A	#N/A	30
	NET	-	#N/A	$ -	(14,178,421)	#N/A	#N/A	31
August-25	INJ		#N/A	#N/A	2,316,704	#N/A	#N/A	32
	W/D		#N/A	#N/A	(16,495,125)	#N/A	#N/A	33
	NET	-	#N/A	$ -	(14,178,421)	#N/A	#N/A	34
September-25	INJ		#N/A	#N/A	2,316,704	#N/A	#N/A	35
	W/D		#N/A	#N/A	(16,495,125)	#N/A	#N/A	36
	NET	-	#N/A	$ -	(14,178,421)	#N/A	#N/A	37
						#N/A		

Michael Maggioli:
Begg. In Nov and through April- Reminder to update formula to pull Weighted Avg Rate (7 columns) instead of Commodity Rate (3 columns).

Michael Maggioli:

Begg. In May and through October- Reminder to update formula to pull Commodity Rate (3 columns) instead of Weighted avg. Rate (7 columns).

PA Rate - Q2 2025

To: M. Maggioli

From: C. Mann

Date: February 7, 2025

Re: PAD Storage Rates

The storage rates in effect for the 2nd Quarter of FY25 are derived as follows:

	($/Mcf) (a)
Demand	$2.5371
Commodity	$3.1539
Total	$5.6910

Qtrly PA Stroage Rates- Updated on Schedules Tab

Notes:
(1) Based on the PGC 2024 February Quarterly Filing of projected values.

(2) Using 1.051 Dth/Mcf conversion factor

(3) Storage Rates are derived at Delivered Volume to NFGDC with 3 months of actuals & 9 months of projections

cc:
N. Pasquarella
A. Riffel
M. Duszenko
L. Petko
L. Metzger
M. Maggioli
D. Koch
T. Wesoloski

National Fuel Gas Distribution Corporation
Pennsylvania Division
Unit Storage Gas Cost ($/Mcf)
For the Twelve Months Ending September 2025

Conversion Factor 1.051

	Actual Oct-24	Actual Nov-24	Actual Dec-24	Projected Jan-25	Projected Feb-25	Projected Mar-25	Projected Apr-25	Projected May-25	Projected Jun-25	Projected Jul-25	Projected Aug-25	Projected Sep-25	Total
Demand													
Upstream Purchased Gas Cost	$3,094,737	$3,118,166	$3,140,652	$3,127,909	$3,127,909	$3,122,864	$3,152,768	$3,147,742	$3,152,768	$3,152,768	$3,162,839	$3,172,910	$37,674,033
Appalachian Gas Cost	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Local Production Gas Cost	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Storage Rental & Transp. Cost	$1,225,420	$1,224,494	$1,223,784	$1,507,468	$1,507,468	$1,507,468	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$1,617,149	$17,898,996
Total Demand Cost	$4,320,157	$4,342,660	$4,364,436	$4,635,377	$4,635,377	$4,630,332	$4,769,917	$4,764,891	$4,769,917	$4,769,917	$4,779,988	$4,790,059	$55,573,029
Less: Offsystem Sales Purchase	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Net Demand Cost	$4,320,157	$4,342,660	$4,364,436	$4,635,377	$4,635,377	$4,630,332	$4,769,917	$4,764,891	$4,769,917	$4,769,917	$4,779,988	$4,790,059	$55,573,029
Total Receipt Volume (Mcf)	1,647,462	1,206,400	1,983,960	2,208,360	2,377,365	2,199,960	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	22,123,125
Less: Total Shrinkage (Mcf)	30,308	23,041	39,473	26,086	23,479	17,667	18,730	12,845	6,984	6,734	6,734	6,624	218,703
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	-
(1) Storage Rates are derived at Delivered V	1,617,154	1,183,359	1,944,487	2,182,274	2,353,887	2,182,293	1,466,387	1,959,396	2,400,279	1,569,915	1,575,501	1,469,489	21,904,422
9 months of projected values.													
Unit Storage Demand Gas Cost ($/Mcf)													$2.5371
Commodity													
Upstream Purchased Gas Cost	$3,073,152	$2,700,516	$6,110,405	$8,230,670	$8,406,339	$5,149,589	$6,574,209	$7,924,858	$5,113,906	$5,315,381	$4,899,198	$4,726,132	$68,224,356
Appalachian Gas Cost	$0	$0	$0	$20,737	$23,431	$21,352	$20,234	$21,561	$22,486	$24,638	$24,837	$23,747	$203,023
Local Production Gas Cost	$23,183	$32,900	$45,973	$0	$0	$0	$0	$0	$0	$0	$0	$0	$102,056
Storage Rental & Transp. Cost	$30,208	$26,068	$49,580	$77,101	$59,404	$69,850	$3,589	$50,569	$48,914	$49,043	$44,207	$49,541	$558,074
Total Commodity Cost	$3,126,543	$2,759,484	$6,205,958	$8,328,508	$8,489,174	$5,240,791	$6,598,032	$7,996,988	$5,185,306	$5,389,062	$4,968,242	$4,799,420	$69,087,509
Less: Offsystem Sales Purchases	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Net Commodity Cost	$3,126,543	$2,759,484	$6,205,958	$8,328,508	$8,489,174	$5,240,791	$6,598,032	$7,996,988	$5,185,306	$5,389,062	$4,968,242	$4,799,420	$69,087,509
Total Receipt Volume (Mcf)	1,647,462	1,206,400	1,983,960	2,208,360	2,377,365	2,199,960	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	22,123,125
Less: Total Shrinkage (Mcf)	30,308	23,041	39,473	26,086	23,479	17,667	18,730	12,845	6,984	6,734	6,734	6,624	218,703
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	1,617,154	1,183,359	1,944,487	2,182,274	2,353,887	2,182,293	1,466,387	1,959,396	2,400,279	1,569,915	1,575,501	1,469,489	21,904,422
Unit Storage Commodity Gas Cost ($/Mcf)													$3.1539

Notes:
1. Based on the PGC 2024 February Quarterly Filing
2. Using 1.051 Mcf/Dth conversion factor
3. Storage rates are derived at Delivered Volume to NFGDC with 3 months of actuals & 9 months of projections

F:\RARA\Common\Accounting\Storage Rate\2025\[Sto 2_25.xlsx]B

NFG Distribution Corporation
Inventory Cost Record as Booked
April 30, 2025
F:\Accounting\SOX Secured Files\Monthly Entries NFGDC\Monthly\STORAGE\Stor25\[Stor0425.xls]calc mcf

W/S B
Product 1902

APPROVED
By Shannon N Bolender at 10:40 am, May 13, 2025

	Current Month MCF	Rate	Amount	Since October 1st MCF	Rate *	Amount
UPDATE LINKS						
Balance Beginning of Period						
New York	A 5,792,376	0.1471	A $852,068.16	19,970,797	$1.2118	$24,200,576.02
Pennsylvania	2,388,716	(9.2320)	($22,052,669.00)	8,155,231	$1.3200	$10,764,567.87
	8,181,092	(2.5914)	($21,200,600.84)	28,126,028	1.2432	$34,965,143.89
Input - New York	1,233,651	3.2700	$4,034,038.77	3,550,355	2.2701	$8,059,641.79
- Pennsylvania	645,883	6.4342	$4,155,735.13	1,581,077	C 5.9946	$9,477,924.18
Output - New York	567,312	B 3.2700	$1,855,110.24	17,062,437	1.7131	$29,229,221.12
- Pennsylvania	285,315	13.1258	$3,744,988.15	6,987,024	C 5.9946	$41,884,414.07
Net - New York	666,339	3.2700	$2,178,928.53	(13,512,082)	1.5667	($21,169,579.33)
Net - Pennsylvania	360,568	1.1392	$410,746.98	(5,405,947)	5.9946	($32,406,489.89)
	1,026,907	2.5218	$2,589,675.51	(18,918,029)	2.8320	($53,576,069.22)
Loss	0	0.0000	0.00	0	0.0000	0.00
Balance End of Period to W/S C						
New York	D 6,458,715	$0.4693	$3,030,996.69	6,458,715	$0.4693	$3,030,996.69
Pennsylvania	2,749,284	($7.8718)	($21,641,922.02)	2,749,284	($7.8718)	($21,641,922.02)
TOTAL	9,207,999	($2.0212)	($18,610,925.33)	9,207,999	($2.0212)	($18,610,925.33)
* Rate per Valuation Department	6,458,715	0	0		-	OK
	2,749,284	0	0		-	OK

Michael Maggioli:
Updated 11/24

UPDATE LINKS			Note: Links neede
A	2,316,704	A 4,025,603	Do not use links for
	935,194	5,322,189	
	16,495,125	27,374,111	
	6,701,709	38,199,425	
NY	(14,178,421)	(23,348,507.86)	
PA	(5,766,515)	(32,817,236.87)	

Michael Maggioli:
10/31/24-
Updated with
9/30/24 balances

UPDATE FIRST MONTH OF FISCAL YEAR

	Gas Stored Underground YTD (9/30/2024)		
New York	19,970,797	$ 1.211798	$24,200,576.02
Pennsylvania	8,155,231	$ 1.319959	10,764,567.87
	28,126,028	$ 1.243160	$34,965,143.89

Gas Stored Underground Current

New York	6,458,715	$ 0.4693	$3,030,996.69	
Pennsylvania	2,749,284	$ (7.8718)	($21,641,922.02)	
	9,207,999	($2.0212)	($18,610,925.33)	

Balance Sheet Presentation

Gas Stored Underground Current (LIFO)				
New York	6,458,715	$0.4693	$3,030,996.69	
Pennsylvania	2,749,284	($7.8718)	($21,641,922.02)	
Add: Reserve For Gas Replacement				
New York			$2,032,110.45	(Positive amount recorded to Account 253551 - Negative amount recorded to 591800)
Pennsylvania			$23,797,137.00	(Positive amount recorded to Account 253552 - Negative amount recorded to 591800)
			$25,829,247.45	
Gas Stored Underground Current	9,207,999	$0.7839	$7,218,322.12	Agrees to B/S a/c # 164100
New York	6,458,715	$0.7839	$5,063,107.14	- OK
Pennsylvania	2,749,284	$0.7839	$2,155,214.98	- OK
	9,207,999	$0.7839	$7,218,322.12	

Ties to layer rate table (next page)

Michael Maggioli:
Updated 11/24

Purchased Gas Sold	Mcf	Monthly	Dollars	Mcf	YTD	Dollars
Injections						
New York	1,233,651		$4,034,038.77	3,550,355		$8,059,641.79
Pennsylvania	645,883		$4,155,735.13	1,581,077		$9,477,924.18
	1,879,534		$8,189,773.90	5,131,432		$17,537,565.97
Withdrawals						
New York	567,312		$1,855,110.24	17,062,437		$29,229,221.12
Pennsylvania	285,315		$3,744,988.15	6,987,024		$41,884,414.07
	852,627		$5,600,098.39	24,049,461		$71,113,635.19

UPDATE LINKS			Note: Links neede
	Prior Month YTD		Do not use links for
A	2,316,704	A $4,025,603.02	
	935,194	$5,322,189.05	
	3,251,898	$ 9,347,792.07	
	16,495,125	$27,374,110.88	
	6,701,709	$38,199,425.92	
	23,196,834	$ 65,513,536.80	

A = Agrees to prior month ending balance
B = Agrees to calculated NY Storage rate
C = Agrees to calculated PA Storage rate
D = Agrees to estimated ending storage inventory balance

NFG Distribution Corporation
Storage Gas Inventory Priced at Layer Rates
4/30/2025

W/S C
PRODUCT# 1902

**Please Note: First month following fiscal YE (Oct) when adding PY layer ensure that columns R-W are updated (copy & paste values) w/ PY ending balances (Sep 30 current month amounts at layer rates (X-AA). Also please note that formulas need to be reviewed & updated in rows V45-Z71 to ensure correct prior month reserve balance is referenced. The cell reference will shift due to added layer rate insert in Oct.

**Please Note: First month following fiscal YE (Oct)- Make sure to update the formulas of new years layer rate row for X,Y,Z,AA columns.

Layer Year	MCF 9/30/24 NY	MCF 9/30/24 PA	Layer Rate NY	Layer Rate PA	Amount 9/30/24 NY	Amount 9/30/24 PA	CURRENT MONTH MCF NY	CURRENT MONTH MCF PA	CURRENT MONTH Amount at Layer Rates NY	CURRENT MONTH Amount at Layer Rates PA
2025							-	-	-	-
2024	702,252	288,514	1.6447065	4.823600061	$ 1,154,998.42	$ 1,391,676.15	-	-	-	-
2023	92,382	-	1.6286354	0	$ 150,456.59	$ -	-	-	0.00	-
2022	-	-	0	0	$ -	$ -	-	-	0.00	-
2021	-	-	0	0	$ -	$ -	-	-	0.00	0.00
2020	551,946	497,240	1.4783043	3.7243000	$ 815,944.14	$ 1,851,870.93	0	0	0.00	0.00
2019	845,192	29,807	2.1754511	4.6127003	$ 1,838,673.90	$ 137,490.76	0	0	0.00	0.00
2018	455,033	-	2.5472239	0	$ 1,159,070.95	$ -	0	0	0.00	0.00
2017	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2016	-	150,371	0	3.8719000	$ -	$ 582,221.47	0	0	0.00	0.00
2015	-	153,235	1.5312976	4.1997000	$ -	$ 643,541.03	0	0	0.00	0.00
2014	-	122,940	0	6.0065144	$ -	$ 738,440.88	0	0	0.00	0.00
2013	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2012	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2011	517,091	-	4.9097543	0	$ 2,538,789.77	$ -	0	0	0.00	0.00
2010	500,421	-	5.2178791	0	$ 2,611,136.27	$ -	0	0	0.00	0.00
2007	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2003	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2002	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2001	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2000	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1999	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1997	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1996	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1995	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1994	391,383	-	3.7185166	3.7185166	$ 1,455,365.19	$ -	0	0	0.00	0.00
1993	15,915,097	6,913,124	0.7839186	0.7839186	$ 12,476,140.78	$ 5,419,326.65	6,458,715	2,749,284	5,063,107.14	2,155,215
	19,970,797	8,155,231	$ 1.21180	$ 1.31996	24,200,576.02	10,764,567.87	6,458,715	2,749,284	$ 5,063,107.14	$ 2,155,214.98
									Per W/S B	Per W/S B

Layers agree to 9/30/2024 file

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references- only if adding new row across the entire spreadsheet. FY 25 only added row within columns of table above so did not shift cell references.

Computation of Reserve for Gas Replacement

0.783918611

		NY	PA	TOTAL	
Inventory at FIFO Basis		3,030,996.69	(21,641,922.02)	(18,610,925.33)	per W/S B
Inventory at Layer Rates		5,063,107.14	2,155,214.98	7,218,322.12	
Required Reserve	Apr 30, 2025	$2,032,110.45	$23,797,137.00	$25,829,247.45	
Required Reserve as of	Apr 30, 2025	$2,032,110.45	$23,797,137.00	$25,829,247.45	
Required Reserve as of	Mar 31, 2025	$3,688,683.44	$23,925,228.01	$27,613,911.45	UPDATE
					LINK
Adjustment for Current Month		($1,656,572.99)	($128,091.01)	($1,784,664.00)	

NY & PA: LIFO > FIFO

Michael Maggioli: Oct: Make sure to update cell ref from shift due to layer rate add in above table.

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references.

Accounting Entry:

1774-164101	Gas Storage	($1,656,572.99)
4776-164102	Gas Storage	(128,091.01)
1774-253551	Reserve for Gas Replacement	1,656,572.99
4776-253552	Reserve for Gas Replacement	128,091.01

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell

Accounting Entry (NY Only):

			Dr. / (Cr.)	
1774-164101	Gas Storage		$ -	
1774-591800	Gas Injected into Storage (pge)		-	
Booked prior month		3/31/25	$ -	UPDATE
NY Current Month Entry			-	LINK

-to adjust NY inventory balance for impact of negative reserve for gas replacement.

Accounting Entry (PA Only):

			Dr. / (Cr.)	
1774-164101	Gas Storage		$ -	
1774-591800	Gas Injected into Storage (pge)		-	
Booked prior month		3/31/25	$ -	UPDATE
PA Current Month Entry			-	LINK

-to adjust PA inventory balance for impact of negative reserve for gas replacement.

Michael Maggioli: This was adjusted during Oct ME to reflect that we did not book the .01 rounding in Sep 23. Make sure to back this formula

5/9/2025 9:50 AM

NY Rate - April 2025

$4,034,039/1,233,651 MCF = $3.27/mcf - NY RATE

Calculation of FYTD RATE to Produce the Monthly Storage Journal Entry for NFGDC-NY

		MCF - Month	$$ - Month	COMMODITY Rate - Month	MCF - FYTD	$$ - FYTD	Rate - FYTD	
								1
October-24	INJ	1,625,125	2,878,909	$ 1.77150	1,625,125	2,878,909	$ 1.77150	2
	W/D	(210,332)	(372,603)	$ 1.77150	(210,332)	(372,603)	$ 1.77150	3
	NET	1,414,793	2,506,306	$ 1.77150	1,414,793	2,506,306	$ 1.77150	4
November-24	INJ	375,892	623,259	$ 1.65808	2,001,017	3,502,168	$ 1.75019	5
	W/D	(1,346,381)	(2,232,409)	$ 1.65808	(1,556,713)	(2,605,012)	$ 1.67341	6
	NET	(970,489)	(1,609,149)	$ 1.65808	444,304	897,156	$ 2.01924	7
December-24	INJ	35,005	58,041	$ 1.65808	2,036,022	3,560,209	$ 1.74861	8
	W/D	(3,141,052)	(5,208,119)	$ 1.65808	(4,697,765)	(7,813,131)	$ 1.66316	9
	NET	(3,106,047)	(5,150,078)	$ 1.65808	(2,661,743)	(4,252,922)	$ 1.59780	10
January-25	INJ	11,962	19,834	$ 1.65808	2,047,984	3,580,043	$ 1.74808	11
	W/D	(4,473,445)	(7,417,335)	$ 1.65808	(9,171,210)	(15,230,466)	$ 1.66068	12
	NET	(4,461,483)	(7,397,501)	$ 1.65808	(7,123,226)	(11,650,422)	$ 1.63555	13
February-25	INJ	165,131	273,801	$ 1.65808	2,213,115	3,853,844	$ 1.74137	14
	W/D	(4,310,008)	(7,146,343)	$ 1.65808	(13,481,218)	(22,376,809)	$ 1.65985	15
	NET	(4,144,877)	(6,872,542)	$ 1.65808	(11,268,103)	(18,522,965)	$ 1.64384	16
March-25	INJ	103,589	171,759	$ 1.65808	2,316,704	4,025,603	$ 1.73764	17
	W/D	(3,013,907)	(4,997,302)	$ 1.65808	(16,495,125)	(27,374,111)	$ 1.65953	18
	NET	(2,910,318)	(4,825,543)	$ 1.65808	(14,178,421)	(23,348,508)	$ 1.64676	19
April-25	INJ	1,233,651	4,034,039	$ 3.27000	3,550,355	8,059,642	$ 2.27009	20
	W/D	(567,312)	(1,855,110)	$ 3.27000	(17,062,437)	(29,229,221)	$ 1.71307	21
	NET	666,339	2,178,929	3.27	(13,512,082)	(21,169,579)	$ 1.56671	22
May-25	INJ		-	$ -	3,550,355	8,059,642	$ 2.27009	23
	W/D		-	$ -	(17,062,437)	(29,229,221)	$ 1.71307	24
	NET	-	-	$ -	(13,512,082)	(21,169,579)	$ 1.56671	25
June-25	INJ		-	$ -	3,550,355	8,059,642	$ 2.27009	26
	W/D		-	$ -	(17,062,437)	(29,229,221)	$ 1.71307	27
	NET	-	-	$ -	(13,512,082)	(21,169,579)	$ 1.56671	28
July-25	INJ		-	$ -	3,550,355	8,059,642	$ 2.27009	29
	W/D		-	$ -	(17,062,437)	(29,229,221)	$ 1.71307	30
	NET	-	-	$ -	(13,512,082)	(21,169,579)	$ 1.56671	31
August-25	INJ		-	$ -	3,550,355	8,059,642	$ 2.27009	32
	W/D		-	$ -	(17,062,437)	(29,229,221)	$ 1.71307	33
	NET	-	-	$ -	(13,512,082)	(21,169,579)	$ 1.56671	34
September-25	INJ		-	$ -	3,550,355	(14,955,287.02)	$ (4.21234)	35
	W/D		-	$ -	(17,062,437)	(29,229,221)	$ 1.71307	36
	NET	-	-	$ -	(13,512,082)	(44,184,508.14)	$ 3.27000	
						$ (73,413,729.25768)		

Michael Maggioli:
Begg. In Nov and through April- Reminder to update formula to pull Weighted Avg Rate (7 columns) instead of Commodity Rate (3 columns).

Michael Maggioli:

Begg. In May and through October- Reminder to update formula to pull Commodity Rate (3 columns) instead of Weighted avg. Rate (7 columns).

Payne:
Prepare schedule E for correct value for year end.

Maggioli: Includes YE adj to bring reserve replacement bal to 0. (Review to add if formula specific to period 12.)

$	8,059,641.78713
$	-
$	(23,014,928.80945)
	(14,955,287.02)
	-

5/9/2025 9:53 AM

PA Rate - Q3 2025

To: M. Maggioli

From: C. Mann

Date: May 6, 2025

Re: PAD Storage Rates

The storage rates in effect for the 3rd Quarter of FY25 are derived as follows:

	($/Mcf)
Demand	**$2.5808**
Commodity	**$3.4138**
Total	**$5.9946**

Qtrly PA Storage Rates- Updated on Schedules Tab

Notes:

(1) Based on the PGC 2024 May Quarterly Filing of projected values.

(2) Using 1.051 Dth/Mcf conversion factor

(3) Storage Rates are derived at Delivered Volume to NFGDC with 6 months of actuals & 6 months of projections

CC:

N. Pasquarella
M. Duszenko
L. Petko
L. Metzger
M. Maggioli
D. Koch
T. Wesoloski

National Fuel Gas Distribution Corporation
Pennsylvania Division
Unit Storage Gas Cost ($/Mcf)
For the Twelve Months Ending September 2025

Conversion Factor **1.051**

	Actual Oct-24	Actual Nov-24	Actual Dec-24	Actual Jan-25	Actual Feb-25	Actual Mar-25	Projected Apr-25	Projected May-25	Projected Jun-25	Projected Jul-25	Projected Aug-25	Projected Sep-25	Total
Demand													
Upstream Purchased Gas Cost	3,094,737	3,118,166	3,140,652	3,140,931	3,123,608	3,122,428	3,129,731	3,124,664	3,139,780	3,134,735	3,149,831	3,159,902	37,579,165
Appalachian Gas Cost	0	0	0	0	0	0	0	0	0	0	0	0	0
Local Production Gas Cost	0	0	0	0	0	0	0	0	0	0	0	0	0
Storage Rental & Transportation Cost	1,225,420	1,224,494	1,223,784	1,222,950	1,221,729	1,220,886	1,632,822	1,632,711	1,632,711	1,632,711	1,632,711	1,632,711	17,135,640
Total Demand Cost	4,320,157	4,342,660	4,364,436	4,363,881	4,345,337	4,343,314	4,762,553	4,757,375	4,772,491	4,767,446	4,782,542	4,792,613	54,714,806
Less: Offsystem Sales Purchases	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Demand Cost ($)	**$4,320,157**	**$4,342,660**	**$4,364,436**	**$4,363,881**	**$4,345,337**	**$4,343,314**	**$4,762,553**	**$4,757,375**	**$4,772,491**	**$4,767,446**	**$4,782,542**	**$4,792,613**	**$54,714,806**
Total Receipt Volume (Mcf)	1,647,462	1,206,400	1,983,960	2,402,651	2,232,898	1,511,594	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	21,484,582
Less: Total Shrinkage (Mcf)	30,308	23,041	39,473	55,975	45,404	30,628	18,730	12,845	6,984	6,734	6,734	6,624	283,480
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	**1,617,154**	**1,183,359**	**1,944,487**	**2,346,676**	**2,187,494**	**1,480,966**	**1,466,387**	**1,959,396**	**2,400,279**	**1,569,915**	**1,575,501**	**1,469,489**	**21,201,103**
												Unit Storage Demand Gas Cost ($/Mcf) -	**$2.5808**
Commodity													
Upstream Purchased Gas Cost	3,073,152	2,700,516	6,110,405	10,732,567	9,337,142	5,409,159	7,750,190	7,306,220	4,790,853	5,080,301	4,789,145	4,403,669	71,483,318
Appalachian Gas Cost	0	0	0	0	0	0	23,552	19,947	20,162	22,363	22,825	21,738	130,587
Local Production Gas Cost	23,183	32,900	45,973	42,423	32,559	52,759	0	0	0	0	0	0	229,797
Storage Rental & Transportation Cost	30,208	26,068	49,580	87,691	59,530	33,899	3,699	50,702	49,058	49,156	44,273	49,682	533,546
Total Commodity Cost	3,126,543	2,759,484	6,205,958	10,862,681	9,429,231	5,495,816	7,777,441	7,376,869	4,860,073	5,151,820	4,856,243	4,475,089	72,377,249
Less: Offsystem Sales Purchases	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Commodity Cost ($)	**$3,126,543**	**$2,759,484**	**$6,205,958**	**$10,862,681**	**$9,429,231**	**$5,495,816**	**$7,777,441**	**$7,376,869**	**$4,860,073**	**$5,151,820**	**$4,856,243**	**$4,475,089**	**$72,377,249**
Total Receipt Volume (Mcf)	1,647,462	1,206,400	1,983,960	2,402,651	2,232,898	1,511,594	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	21,484,582
Less: Total Shrinkage (Mcf)	30,308	23,041	39,473	55,975	45,404	30,628	18,730	12,845	6,984	6,734	6,734	6,624	283,480
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	**1,617,154**	**1,183,359**	**1,944,487**	**2,346,676**	**2,187,494**	**1,480,966**	**1,466,387**	**1,959,396**	**2,400,279**	**1,569,915**	**1,575,501**	**1,469,489**	**21,201,103**
												Unit Storage Commodity Gas Cost ($/Mcf) -	**$3.4138**

Notes:
1). Based on the PGC 2024 May Quarterly Filing
2). Using 1.051 Mcf/Dth conversion factor
3. Storage rates are derived at Delivered Volume to NFGDC with 6 months of actuals & 6 months of projections

NFG Distribution Corporation
Inventory Cost Record as Booked
May 31, 2025
F:\Accounting\SOX Secured Files\Monthly Entries NFGDC\Monthly\STORAGE\Stor25\[Stor0525.xls]calc mcf

W/S B
Product 1902

APPROVED
By Shannon N Bolender at 3:15 pm, Jun 12, 2025

	Current Month MCF	Rate	Amount	Since October 1st MCF	Rate *	Amount
UPDATE LINKS						
Balance Beginning of Period						
New York	A 6,458,715	0.4693	A $3,030,996.69	19,970,797	$1.2118	$24,200,576.02
Pennsylvania	2,749,284	(7.8718)	($21,641,922.02)	8,155,231	$1.3200	$10,764,567.87
	9,207,999	(2.0212)	($18,610,925.33)	28,126,028	1.2432	$34,965,143.89
Input - New York	1,978,407	2.5025	$4,950,963.51	5,528,762	2.3533	$13,010,605.30
- Pennsylvania	1,008,911	5.9946	$6,048,017.88	2,589,988	C 5.9946	$15,525,942.06
Output - New York	(74,572)	B 2.5025	($186,616.43)	16,987,865	1.7086	$29,042,604.69
- Pennsylvania	7,368	5.9946	$44,168.21	6,994,392	C 5.9946	$41,928,582.28
Net - New York	2,052,979	2.5025	$5,137,579.94	(11,459,103)	1.3991	($16,031,999.39)
Net - Pennsylvania	1,001,543	5.9946	$6,003,849.67	(4,404,404)	5.9946	($26,402,640.22)
	3,054,522	3.6475	$11,141,429.61	(15,863,507)	2.6750	($42,434,639.61)
Loss	0	0.0000	0.00	0	0.0000	0.00
Balance End of Period to W/S C						
New York	D 8,511,694	$0.9597	$8,168,576.63	8,511,694	$0.9597	$8,168,576.63
Pennsylvania	3,750,827	($4.1692)	($15,638,072.35)	3,750,827	($4.1692)	($15,638,072.35)
TOTAL	12,262,521	($0.6091)	($7,469,495.72)	12,262,521	($0.6091)	($7,469,495.72)
* Rate per Valuation Department	8,511,694	0	0		-	OK
	3,750,827	0	0		-	OK

Michael Maggioli: Updated 11/24

UPDATE LINKS		Note: Links neede
A 3,550,355	A 8,059,642	Do not use links for
1,581,077	9,477,924	
17,062,437	29,229,221	
6,987,024	41,884,414	
NY (13,512,082)	(21,169,579.33)	
PA (5,405,947)	(32,406,489.89)	

Michael Maggioli: 10/31/24- Updated with 9/30/24 balances

UPDATE FIRST MONTH OF FISCAL YEAR

Gas Stored Underground YTD (9/30/2024)

New York	19,970,797	$	1.211798	$24,200,576.02
Pennsylvania	8,155,231	$	1.319959	10,764,567.87
	28,126,028	$	1.243160	$34,965,143.89

Gas Stored Underground Current

New York	8,511,694	$	0.9597	$8,168,576.63
Pennsylvania	3,750,827	$	(4.1692)	($15,638,072.35)
	12,262,521		($0.6091)	($7,469,495.72)

Balance Sheet Presentation

Gas Stored Underground Current (LIFO)				
New York	8,511,694		$0.9597	$8,168,576.63
Pennsylvania	3,750,827		($4.1692)	($15,638,072.35)
Add: Reserve For Gas Replacement				
New York				($1,496,101.04) (Positive amount recorded to Account 253551 - Negative amount recorded to 591800)
Pennsylvania				$18,578,415.52 (Positive amount recorded to Account 253552 - Negative amount recorded to 591800)
				$17,082,314.48
Gas Stored Underground Current	12,262,521		$0.7839	$9,612,818.76 Agrees to B/S a/c # 164100
New York	8,511,694		$0.7839	$6,672,475.59 - OK
Pennsylvania	3,750,827		$0.7839	$2,940,343.17 - OK
	12,262,521		$0.7839	$9,612,818.76

Ties to layer rate table (next page)

Michael Maggioli: Updated 11/24

UPDATE LINKS		Note: Links neede
Prior Month YTD		Do not use links for
A 3,550,355	A $8,059,641.79	
1,581,077	$9,477,924.18	
5,131,432	$ 17,537,565.97	
17,062,437	$29,229,221.12	
6,987,024	$41,884,414.07	
24,049,461	$ 71,113,635.19	

Purchased Gas Sold	Mcf	Monthly	Dollars	Mcf	YTD	Dollars
Injections						
New York	1,978,407		$4,950,963.51	5,528,762		$13,010,605.30
Pennsylvania	1,008,911		$6,048,017.88	2,589,988		$15,525,942.06
	2,987,318		$10,998,981.39	8,118,750		$28,536,547.36
Withdrawals						
New York	(74,572)		($186,616.43)	16,987,865		$29,042,604.69
Pennsylvania	7,368		$44,168.21	6,994,392		$41,928,582.28
	(67,204)		($142,448.22)	23,982,257		$70,971,186.97

A = Agrees to prior month ending balance
B = Agrees to calculated NY storage rate
C = Agrees to calculated PA Storage rate
D = Agrees to estimated ending storage inventory balance

NFG Distribution Corporation
Storage Gas Inventory Priced at Layer Rates
5/31/2025

W/S C
PRODUCT# 1902

**Please Note: First month following fiscal YE (Oct) when adding PY layer ensure that columns R-W are updated (copy & paste values) w/ PY ending balances (Sep 30 current month amounts at layer rates (X-AA). Also please note that formulas need to be reviewed & updated in rows V45-Z71 to ensure correct prior month reserve balance is referenced. The cell reference will shift due to added layer rate insert in Oct.

**Please Note: First month following fiscal YE (Oct)- Make sure to update the formulas of new years layer rate row for X,Y,Z,AA columns.

Layer Year	MCF 9/30/24 NY	MCF 9/30/24 PA	Layer Rate NY	Layer Rate PA	Amount 9/30/24 NY	Amount 9/30/24 PA	CURRENT MONTH MCF NY	CURRENT MONTH MCF PA	Amount at Layer Rates NY	Amount at Layer Rates PA
2025							-	-	-	-
2024	702,252	288,514	1.6447065	4.823600061	$ 1,154,998.42	$ 1,391,676.15	-	-	-	-
2023	92,382	-	1.6286354	0	$ 150,456.59	$ -	-	-	0.00	-
2022	-	-	0	0	$ -	$ -	-	-	0.00	-
2021	-	-	0	0	$ -	$ -	-	-	0.00	0.00
2020	551,946	497,240	1.4783043	3.7243000	$ 815,944.14	$ 1,851,870.93	0	0	0.00	0.00
2019	845,192	29,807	2.1754511	4.6127003	$ 1,838,673.90	$ 137,490.76	0	0	0.00	0.00
2018	455,033	-	2.5472239	0	$ 1,159,070.95	$ -	0	0	0.00	0.00
2017	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2016	-	150,371	0	3.8719000	$ -	$ 582,221.47	0	0	0.00	0.00
2015	-	153,235	1.5312976	4.1997000	$ -	$ 643,541.03	0	0	0.00	0.00
2014	-	122,940	0	6.0065144	$ -	$ 738,440.88	0	0	0.00	0.00
2013	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2012	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2011	517,091	-	4.9097543	0	$ 2,538,789.77	$ -	0	0	0.00	0.00
2010	500,421	-	5.2178791	0	$ 2,611,136.27	$ -	0	0	0.00	0.00
2007	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2003	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2002	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2001	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2000	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1999	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1997	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1996	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1995	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1994	391,383	-	3.7185166	3.7185166	$ 1,455,365.19	$ -	0	0	0.00	0.00
1993	15,915,097	6,913,124	0.7839186	0.7839186	$ 12,476,140.78	$ 5,419,326.65	8,511,694	3,750,827	6,672,475.59	2,940,343
	19,970,797	8,155,231	$ 1.21180	$ 1.31996	24,200,576.02	10,764,567.87	8,511,694	3,750,827	$ 6,672,475.59	$ 2,940,343.17
							Per W/S B	Per W/S B	Per W/S B	Per W/S B

Layers agree to 9/30/2024 file

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references- only if adding new row across the entire spreadsheet. FY 25 only added row within columns of table above so did not shift cell references.

Computation of Reserve for Gas Replacement

0.783918612

		NY	PA	TOTAL	
Inventory at FIFO Basis		8,168,576.63	(15,638,072.35)	(7,469,495.72)	per W/S B
Inventory at Layer Rates		6,672,475.59	2,940,343.17	9,612,818.76	
Required Reserve	May 31, 2025	$0.00	$18,578,415.52	$17,082,314.48	
Required Reserve as of	May 31, 2025	$0.00	$18,578,415.52	$18,578,415.52	
Required Reserve as of	Apr 30, 2025	$2,032,110.45	$23,797,137.00	$25,829,247.45	UPDATE
					LINK
Adjustment for Current Month		($2,032,110.45)	($5,218,721.48)	($7,250,831.93)	

NY: LIFO < FIFO
PA: LIFO > FIFO

Michael Maggioli: Oct: Make sure to update cell ref from shift due to layer rate add in above table.

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references

Accounting Entry:

1774-164101	Gas Storage	($2,032,110.45)
4776-164102	Gas Storage	(5,218,721.48)
1774-253551	Reserve for Gas Replacement	2,032,110.45
4776-253552	Reserve for Gas Replacement	5,218,721.48

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell

Accounting Entry (NY Only):

		Dr. / (Cr.)	
1774-164101	Gas Storage	$ (1,496,101.04)	
1774-591800	Gas Injected into Storage (pge)	1,496,101.04	
Booked prior month	4/30/25	$ -	UPDATE
NY Current Month Entry		(1,496,101.04)	LINK

-to adjust NY inventory balance for impact of negative reserve for gas replacement.

Accounting Entry (PA Only):

		Dr. / (Cr.)	
1774-164101	Gas Storage	$ -	
1774-591800	Gas Injected into Storage (pge)	-	
Booked prior month	4/30/25	$ -	UPDATE
PA Current Month Entry		-	LINK

-to adjust PA inventory balance for impact of negative reserve for gas replacement.

Michael Maggioli: This was adjusted during Oct ME to reflect that we did

6/11/2025 5:20 PM

NY Rate - May 2025

$4,950,964/1,978,407 MCF = $2.50/mcf - NY RATE

Calculation of FYTD RATE to Produce the Monthly Storage Journal Entry for NFGDC-NY

		MCF - Month	$$ - Month	COMMODITY Rate - Month	MCF - FYTD	$$ - FYTD	Rate - FYTD	
								1
October-24	INJ	1,625,125	2,878,909	$ 1.77150	1,625,125	2,878,909	$ 1.77150	2
	W/D	(210,332)	(372,603)	$ 1.77150	(210,332)	(372,603)	$ 1.77150	3
	NET	1,414,793	2,506,306	$ 1.77150	1,414,793	2,506,306	$ 1.77150	4
November-24	INJ	375,892	623,259	$ 1.65808	2,001,017	3,502,168	$ 1.75019	5
	W/D	(1,346,381)	(2,232,409)	$ 1.65808	(1,556,713)	(2,605,012)	$ 1.67341	6
	NET	(970,489)	(1,609,149)	$ 1.65808	444,304	897,156	$ 2.01924	7
December-24	INJ	35,005	58,041	$ 1.65808	2,036,022	3,560,209	$ 1.74861	8
	W/D	(3,141,052)	(5,208,119)	$ 1.65808	(4,697,765)	(7,813,131)	$ 1.66316	9
	NET	(3,106,047)	(5,150,078)	$ 1.65808	(2,661,743)	(4,252,922)	$ 1.59780	10
January-25	INJ	11,962	19,834	$ 1.65808	2,047,984	3,580,043	$ 1.74808	11
	W/D	(4,473,445)	(7,417,335)	$ 1.65808	(9,171,210)	(15,230,466)	$ 1.66068	12
	NET	(4,461,483)	(7,397,501)	$ 1.65808	(7,123,226)	(11,650,422)	$ 1.63555	13
February-25	INJ	165,131	273,801	$ 1.65808	2,213,115	3,853,844	$ 1.74137	14
	W/D	(4,310,008)	(7,146,343)	$ 1.65808	(13,481,218)	(22,376,809)	$ 1.65985	15
	NET	(4,144,877)	(6,872,542)	$ 1.65808	(11,268,103)	(18,522,965)	$ 1.64384	16
March-25	INJ	103,589	171,759	$ 1.65808	2,316,704	4,025,603	$ 1.73764	17
	W/D	(3,013,907)	(4,997,302)	$ 1.65808	(16,495,125)	(27,374,111)	$ 1.65953	18
	NET	(2,910,318)	(4,825,543)	$ 1.65808	(14,178,421)	(23,348,508)	$ 1.64676	19
April-25	INJ	1,233,651	4,034,039	$ 3.27000	3,550,355	8,059,642	$ 2.27009	20
	W/D	(567,312)	(1,855,110)	$ 3.27000	(17,062,437)	(29,229,221)	$ 1.71307	21
	NET	666,339	2,178,929	3.27	(13,512,082)	(21,169,579)	$ 1.56671	22
May-25	INJ	1,978,407	4,950,964	$ 2.50250	5,528,762	13,010,605	$ 2.35326	23
	W/D	74,572	186,616	$ 2.50250	(16,987,865)	(29,042,605)	$ 1.70961	24
	NET	2,052,979	5,137,580	$ 2.50250	(11,459,103)	(16,031,999)	$ 1.39906	25
June-25	INJ		-	$ -	5,528,762	13,010,605	$ 2.35326	26
	W/D		-	$ -	(16,987,865)	(29,042,605)	$ 1.70961	27
	NET	-	-	$ -	(11,459,103)	(16,031,999)	$ 1.39906	28
July-25	INJ		-	$ -	5,528,762	13,010,605	$ 2.35326	29
	W/D		-	$ -	(16,987,865)	(29,042,605)	$ 1.70961	30
	NET	-	-	$ -	(11,459,103)	(16,031,999)	$ 1.39906	31
August-25	INJ		-	$ -	5,528,762	13,010,605	$ 2.35326	32
	W/D		-	$ -	(16,987,865)	(29,042,605)	$ 1.70961	33
	NET	-	-	$ -	(11,459,103)	(16,031,999)	$ 1.39906	34
September-25	INJ		-	$ -	5,528,762	(1,788,884.77)	$ (0.32356)	35
	W/D		-	$ -	(16,987,865)	(29,042,605)	$ 1.70961	36
	NET	-	-	$ -	(11,459,103)	(30,831,489.46)	$ 2.69057	37

Michael Maggioli:
Begg. In Nov and through April- Reminder to update formula to pull Weighted Avg Rate (7 columns) instead of Commodity Rate (3 columns).

Michael Maggioli:

Begg. In May and through October- Reminder to update formula to pull Commodity Rate (3 columns) instead of Weighted avg. Rate (7 columns).

Payne:
Prepare schedule E for correct value for year end.

Maggioli: Includes YE adj to bring reserve replacement bal to 0. (Review to add if formula specific to period 12.)

To: M. Maggioli

From: C. Mann

Date: May 6, 2025

Re: PAD Storage Rates

The storage rates in effect for the 3rd Quarter of FY25 are derived as follows:

	($/Mcf)
Demand	**$2.5808**
Commodity	**$3.4138**
Total	**$5.9946**

Qtrly PA Storage Rates- Updated on Schedules Tab

Notes:

(1) Based on the PGC 2024 May Quarterly Filing of projected values.

(2) Using 1.051 Dth/Mcf conversion factor

(3) Storage Rates are derived at Delivered Volume to NFGDC with 6 months of actuals & 6 months of projections

CC:

N. Pasquarella
M. Duszenko
L. Petko
L. Metzger
M. Maggioli
D. Koch
T. Wesoloski

National Fuel Gas Distribution Corporation
Pennsylvania Division
Unit Storage Gas Cost ($/Mcf)
For the Twelve Months Ending September 2025

Conversion Factor **1.051**

	Actual Oct-24	Actual Nov-24	Actual Dec-24	Actual Jan-25	Actual Feb-25	Actual Mar-25	Projected Apr-25	Projected May-25	Projected Jun-25	Projected Jul-25	Projected Aug-25	Projected Sep-25	Total
Demand													
Upstream Purchased Gas Cost	3,094,737	3,118,166	3,140,652	3,140,931	3,123,608	3,122,428	3,129,731	3,124,664	3,139,780	3,134,735	3,149,831	3,159,902	37,579,165
Appalachian Gas Cost	0	0	0	0	0	0	0	0	0	0	0	0	0
Local Production Gas Cost	0	0	0	0	0	0	0	0	0	0	0	0	0
Storage Rental & Transportation Cost	1,225,420	1,224,494	1,223,784	1,222,950	1,221,729	1,220,886	1,632,822	1,632,711	1,632,711	1,632,711	1,632,711	1,632,711	17,135,640
Total Demand Cost	4,320,157	4,342,660	4,364,436	4,363,881	4,345,337	4,343,314	4,762,553	4,757,375	4,772,491	4,767,446	4,782,542	4,792,613	54,714,806
Less: Offsystem Sales Purchases	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Demand Cost ($)	**$4,320,157**	**$4,342,660**	**$4,364,436**	**$4,363,881**	**$4,345,337**	**$4,343,314**	**$4,762,553**	**$4,757,375**	**$4,772,491**	**$4,767,446**	**$4,782,542**	**$4,792,613**	**$54,714,806**
Total Receipt Volume (Mcf)	1,647,462	1,206,400	1,983,960	2,402,651	2,232,898	1,511,594	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	21,484,582
Less: Total Shrinkage (Mcf)	30,308	23,041	39,473	55,975	45,404	30,628	18,730	12,845	6,984	6,734	6,734	6,624	283,480
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	**1,617,154**	**1,183,359**	**1,944,487**	**2,346,676**	**2,187,494**	**1,480,966**	**1,466,387**	**1,959,396**	**2,400,279**	**1,569,915**	**1,575,501**	**1,469,489**	**21,201,103**
												Unit Storage Demand Gas Cost ($/Mcf) -	**$2.5808**
Commodity													
Upstream Purchased Gas Cost	3,073,152	2,700,516	6,110,405	10,732,567	9,337,142	5,409,159	7,750,190	7,306,220	4,790,853	5,080,301	4,789,145	4,403,669	71,483,318
Appalachian Gas Cost	0	0	0	0	0	0	23,552	19,947	20,162	22,363	22,825	21,738	130,587
Local Production Gas Cost	23,183	32,900	45,973	42,423	32,559	52,759	0	0	0	0	0	0	229,797
Storage Rental & Transportation Cost	30,208	26,068	49,580	87,691	59,530	33,899	3,699	50,702	49,058	49,156	44,273	49,682	533,546
Total Commodity Cost	3,126,543	2,759,484	6,205,958	10,862,681	9,429,231	5,495,816	7,777,441	7,376,869	4,860,073	5,151,820	4,856,243	4,475,089	72,377,249
Less: Offsystem Sales Purchases	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Commodity Cost ($)	**$3,126,543**	**$2,759,484**	**$6,205,958**	**$10,862,681**	**$9,429,231**	**$5,495,816**	**$7,777,441**	**$7,376,869**	**$4,860,073**	**$5,151,820**	**$4,856,243**	**$4,475,089**	**$72,377,249**
Total Receipt Volume (Mcf)	1,647,462	1,206,400	1,983,960	2,402,651	2,232,898	1,511,594	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	21,484,582
Less: Total Shrinkage (Mcf)	30,308	23,041	39,473	55,975	45,404	30,628	18,730	12,845	6,984	6,734	6,734	6,624	283,480
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	**1,617,154**	**1,183,359**	**1,944,487**	**2,346,676**	**2,187,494**	**1,480,966**	**1,466,387**	**1,959,396**	**2,400,279**	**1,569,915**	**1,575,501**	**1,469,489**	**21,201,103**
												Unit Storage Commodity Gas Cost ($/Mcf) -	**$3.4138**

Notes:
1). Based on the PGC 2024 May Quarterly Filing
2). Using 1.051 Mcf/Dth conversion factor
3. Storage rates are derived at Delivered Volume to NFGDC with 6 months of actuals & 6 months of projections

NFG Distribution Corporation
Inventory Cost Record as Booked
June 30, 2025
F:\Accounting\SOX Secured Files\Monthly Entries NFGDC\Monthly\STORAGE\Stor25\[Stor0625.xls]calc mcf

W/S B
Product 1902

APPROVED
By Shannon N Bolender at 1:04 pm, Jul 09, 2025

	Current Month MCF	Rate	Amount	Since October 1st MCF	Rate *	Amount
UPDATE LINKS						
Balance Beginning of Period						
New York	A 8,511,694	0.9597	A $8,168,576.63	19,970,797	$1.2118	$24,200,576.02
Pennsylvania	3,750,827	(4.1692)	($15,638,072.35)	8,155,231	$1.3200	$10,764,567.87
	12,262,521	(0.6091)	($7,469,495.72)	28,126,028	1.2432	$34,965,143.89
Input - New York	2,956,204	2.3432	$6,926,977.22	8,484,966	2.3496	$19,937,582.52
- Pennsylvania	1,127,823	5.9946	$6,760,847.76	3,717,811	C 5.9946	$22,286,789.82
Output - New York	4,948	B 2.3432	$11,594.15	16,992,813	1.7098	$29,054,198.84
- Pennsylvania	864	5.9946	$5,179.34	6,995,256	C 5.9946	$41,933,761.62
Net - New York	2,951,256	2.3432	$6,915,383.07	(8,507,847)	1.0716	($9,116,616.32)
Net - Pennsylvania	1,126,959	5.9946	$6,755,668.42	(3,277,445)	5.9946	($19,646,971.80)
	4,078,215	3.3522	$13,671,051.49	(11,785,292)	2.4406	($28,763,588.12)
Loss	0	0.0000	0.00	0	0.0000	0.00
Balance End of Period to W/S C						
New York	D 11,462,950	$1.3159	$15,083,959.70	11,462,950	$1.3159	$15,083,959.70
Pennsylvania	4,877,786	($1.8210)	($8,882,403.93)	4,877,786	($1.8210)	($8,882,403.93)
TOTAL	16,340,736	$0.3795	$6,201,555.77	16,340,736	$0.3795	$6,201,555.77
* Rate per Valuation Department	11,462,950	0	0			- OK
	4,877,786	0	0			- OK

Michael Maggioli:
Updated 11/24

UPDATE LINKS — Note: Links neede — Do not use links for

A	5,528,762	A	13,010,605
	2,589,088		16,525,042
	16,987,865		29,042,605
	6,994,392		41,928,582
NY	(11,459,103)		(16,031,999.39)
PA	(4,404,404)		(26,402,640.22)

Michael Maggioli:
10/31/24- Updated with 9/30/24 balances

UPDATE FIRST MONTH OF FISCAL YEAR

Gas Stored Underground YTD (9/30/2024)

New York	19,970,797	$	1.211798	$24,200,576.02
Pennsylvania	8,155,231	$	1.319959	10,764,567.87
	28,126,028	$	1.243160	$34,965,143.89

Gas Stored Underground Current

New York	11,462,950	$	1.3159	$15,083,959.70
Pennsylvania	4,877,786	$	(1.8210)	($8,882,403.93)
	16,340,736		$0.3795	$6,201,555.77

Balance Sheet Presentation

Gas Stored Underground Current (LIFO)				
New York	11,462,950		$1.3159	$15,083,959.70
Pennsylvania	4,877,786		($1.8210)	($8,882,403.93)
Add: Reserve For Gas Replacement				
New York				($6,097,939.60) (Positive amount recorded to Account 253551 - Negative amount recorded to 591800)
Pennsylvania				$12,706,191.24 (Positive amount recorded to Account 253552 - Negative amount recorded to 591800)
				$6,608,251.64
Gas Stored Underground Current	16,340,736		$0.7839	$12,809,807.41 Agrees to B/S a/c # 164100
New York	11,462,950		$0.7839	$8,986,020.10 - OK
Pennsylvania	4,877,786		$0.7839	$3,823,787.31 - OK
	16,340,736		$0.7839	$12,809,807.41

Ties to layer rate table (next page)

Michael Maggioli:
Updated 11/24

UPDATE LINKS — Note: Links neede — Do not use links for

Purchased Gas Sold	Mcf	Monthly	Dollars	Mcf	YTD	Dollars	Prior Month YTD
Injections							
New York	2,956,204		$6,926,977.22	8,484,966		$19,937,582.52	
Pennsylvania	1,127,823		$6,760,847.76	3,717,811		$22,286,789.82	
	4,084,027		$13,687,824.98	12,202,777		$42,224,372.34	
Withdrawals							
New York	4,948		$11,594.15	16,992,813		$29,054,198.84	
Pennsylvania	864		$5,179.34	6,995,256		$41,933,761.62	
	5,812		$16,773.49	23,988,069		$70,987,960.46	

A	5,528,762	A	$13,010,605.30	
	2,589,088		$15,525,942.06	
	8,118,750	$	28,536,547.36	
	16,987,865		$29,042,604.69	
	6,994,392		$41,928,582.28	
	23,982,257	$	70,971,186.97	

A = Agrees to prior month ending balance
B = Agrees to calculated NY storage rate
C = Agrees to calculated PA storage rate
D = Agrees to estimated ending storage inventory balance

7/8/2025 9:51 AM

NFG Distribution Corporation
Storage Gas Inventory Priced at Layer Rates
6/30/2025

W/S C
PRODUCT# 1902

**Please Note: First month following fiscal YE (Oct) when adding PY layer ensure that columns R-W are updated (copy & paste values) w/ PY ending balances (Sep 30 current month amounts at layer rates (X-AA). Also please note that formulas need to be reviewed & updated in rows V45-Z71 to ensure correct prior month reserve balance is referenced. The cell reference will shift due to added layer rate insert in Oct.

**Please Note: First month following fiscal YE (Oct)- Make sure to update the formulas of new years layer rate row for X,Y,Z,AA columns.

Layer Year	MCF 9/30/24 NY	MCF 9/30/24 PA	Layer Rate NY	Layer Rate PA	Amount 9/30/24 NY	Amount 9/30/24 PA	CURRENT MONTH MCF NY	CURRENT MONTH MCF PA	CURRENT MONTH Amount at Layer Rates NY	CURRENT MONTH Amount at Layer Rates PA
2025							-	-	-	-
2024	702,252	288,514	1.6447065	4.823600061	$ 1,154,998.42	$ 1,391,676.15	-	-	-	-
2023	92,382	-	1.6286354	0	$ 150,456.59	$ -	-	-	0.00	-
2022	-	-	0	0	$ -	$ -	-	-	0.00	-
2021	-	-	0	0	$ -	$ -	-	-	0.00	0.00
2020	551,946	497,240	1.4783043	3.7243000	$ 815,944.14	$ 1,851,870.93	0	0	0.00	0.00
2019	845,192	29,807	2.1754511	4.6127003	$ 1,838,673.90	$ 137,490.76	0	0	0.00	0.00
2018	455,033	-	2.5472239	0	$ 1,159,070.95	$ -	0	0	0.00	0.00
2017	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2016	-	150,371	0	3.8719000	$ -	$ 582,221.47	0	0	0.00	0.00
2015	-	153,235	1.5312976	4.1997000	$ -	$ 643,541.03	0	0	0.00	0.00
2014	-	122,940	0	6.0065144	$ -	$ 738,440.88	0	0	0.00	0.00
2013	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2012	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2011	517,091	-	4.9097543	0	$ 2,538,789.77	$ -	0	0	0.00	0.00
2010	500,421	-	5.2178791	0	$ 2,611,136.27	$ -	0	0	0.00	0.00
2007	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2003	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2002	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2001	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2000	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1999	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1997	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1996	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1995	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1994	391,383	-	3.7185166	3.7185166	$ 1,455,365.19	$ -	0	0	0.00	0.00
1993	15,915,097	6,913,124	0.7839186	0.7839186	$ 12,476,140.78	$ 5,419,326.65	11,462,950	4,877,786	8,986,020.10	3,823,787
	19,970,797	8,155,231	$ 1.21180	$ 1.31996	24,200,576.02	10,764,567.87	11,462,950	4,877,786	$ 8,986,020.10	$ 3,823,787.31
							Per W/S B	Per W/S B	Per W/S B	Per W/S B

Layers agree to 9/30/2024 file

Michael Maggioli:
Make sure to update cell links in Oct given new added layer rate will shift cell references- only if adding new row across the entire spreadsheet. FY 25 only added row within columns of table above so did not shift cell references.

Computation of Reserve for Gas Replacement

0.783918612

		NY	PA	TOTAL	
Inventory at FIFO Basis		15,083,959.70	(8,882,403.93)	6,201,555.77	per W/S B
Inventory at Layer Rates		8,986,020.10	3,823,787.31	12,809,807.41	
Required Reserve	Jun 30, 2025	$0.00	$12,706,191.24	$6,608,251.64	
Required Reserve as of	Jun 30, 2025	$0.00	$12,706,191.24	$12,706,191.24	
Required Reserve as of	May 31, 2025	$0.00	$18,578,415.52	$18,578,415.52	UPDATE LINK
Adjustment for Current Month		$0.00	($5,872,224.28)	($5,872,224.28)	

NY: LIFO < FIFO
PA: LIFO > FIFO

Michael Maggioli:
Oct: Make sure to update cell ref from shift due to layer rate add in above table.

Accounting Entry:

Michael Maggioli:
Make sure to update cell links in Oct given new added layer rate will shift cell references.

1774-164101	Gas Storage	$0.00
4776-164102	Gas Storage	(5,872,224.28)
1774-253551	Reserve for Gas Replacement	0.00
4776-253552	Reserve for Gas Replacement	5,872,224.28

Accounting Entry (NY Only):

Michael Maggioli:
Make sure to update cell links in Oct given new added layer rate will shift cell

			Dr. / (Cr.)	
1774-164101	Gas Storage		$ (6,097,939.60)	
1774-591800	Gas Injected into Storage (pge)		6,097,939.60	
Booked prior month		5/31/25	$ (1,496,101.04)	UPDATE
NY Current Month Entry			(4,601,838.56)	LINK

-to adjust NY inventory balance for impact of negative reserve for gas replacement.

Accounting Entry (PA Only):

			Dr. / (Cr.)	
1774-164101	Gas Storage		$ -	
1774-591800	Gas Injected into Storage (pge)		-	
Booked prior month		5/31/25	$ -	UPDATE
PA Current Month Entry			-	LINK

-to adjust PA inventory balance for impact of negative reserve for gas replacement.

Michael Maggioli:
This was adjusted during Oct ME to reflect that we

7/8/2025 9:52 AM

NY Rate - June 2025

$6,926,977/2,966,204 MCF = $2.34/mcf - NY RATE

Calculation of FYTD RATE to Produce the Monthly Storage Journal Entry for NFGDC-NY

		MCF - Month	$$ - Month	COMMODITY Rate - Month	MCF - FYTD	$$ - FYTD	Rate - FYTD
October-24	INJ	1,625,125	2,878,909	$ 1.77150	1,625,125	2,878,909	$ 1.77150
	W/D	(210,332)	(372,603)	$ 1.77150	(210,332)	(372,603)	$ 1.77150
	NET	1,414,793	2,506,306	$ 1.77150	1,414,793	2,506,306	$ 1.77150
November-24	INJ	375,892	623,259	$ 1.65808	2,001,017	3,502,168	$ 1.75019
	W/D	(1,346,381)	(2,232,409)	$ 1.65808	(1,556,713)	(2,605,012)	$ 1.67341
	NET	(970,489)	(1,609,149)	$ 1.65808	444,304	897,156	$ 2.01924
December-24	INJ	35,005	58,041	$ 1.65808	2,036,022	3,560,209	$ 1.74861
	W/D	(3,141,052)	(5,208,119)	$ 1.65808	(4,697,765)	(7,813,131)	$ 1.66316
	NET	(3,106,047)	(5,150,078)	$ 1.65808	(2,661,743)	(4,252,922)	$ 1.59780
January-25	INJ	11,962	19,834	$ 1.65808	2,047,984	3,580,043	$ 1.74808
	W/D	(4,473,445)	(7,417,335)	$ 1.65808	(9,171,210)	(15,230,466)	$ 1.66068
	NET	(4,461,483)	(7,397,501)	$ 1.65808	(7,123,226)	(11,650,422)	$ 1.63555
February-25	INJ	165,131	273,801	$ 1.65808	2,213,115	3,853,844	$ 1.74137
	W/D	(4,310,008)	(7,146,343)	$ 1.65808	(13,481,218)	(22,376,809)	$ 1.65985
	NET	(4,144,877)	(6,872,542)	$ 1.65808	(11,268,103)	(18,522,965)	$ 1.64384
March-25	INJ	103,589	171,759	$ 1.65808	2,316,704	4,025,603	$ 1.73764
	W/D	(3,013,907)	(4,997,302)	$ 1.65808	(16,495,125)	(27,374,111)	$ 1.65953
	NET	(2,910,318)	(4,825,543)	$ 1.65808	(14,178,421)	(23,348,508)	$ 1.64676
April-25	INJ	1,233,651	4,034,039	$ 3.27000	3,550,355	8,059,642	$ 2.27009
	W/D	(567,312)	(1,855,110)	$ 3.27000	(17,062,437)	(29,229,221)	$ 1.71307
	NET	666,339	2,178,929	3.27	(13,512,082)	(21,169,579)	$ 1.56671
May-25	INJ	1,978,407	4,950,964	$ 2.50250	5,528,762	13,010,605	$ 2.35326
	W/D	74,572	186,616	$ 2.50250	(16,987,865)	(29,042,605)	$ 1.70961
	NET	2,052,979	5,137,580	$ 2.50250	(11,459,103)	(16,031,999)	$ 1.39906
June-25	INJ	2,956,204	6,926,977	$ 2.34320	8,484,966	19,937,583	$ 2.34975
	W/D	(4,948)	(11,594)	$ 2.34320	(16,992,813)	(29,054,199)	$ 1.70979
	NET	2,951,256	6,915,383	$ 2.34320	(8,507,847)	(9,116,616)	$ 1.07155
July-25	INJ		-	$ -	8,484,966	19,937,583	$ 2.34975
	W/D		-	$ -	(16,992,813)	(29,054,199)	$ 1.70979
	NET	-	-	$ -	(8,507,847)	(9,116,616)	$ 1.07155
August-25	INJ		-	$ -	8,484,966	19,937,583	$ 2.34975
	W/D		-	$ -	(16,992,813)	(29,054,199)	$ 1.70979
	NET	-	-	$ -	(8,507,847)	(9,116,616)	$ 1.07155
September-25	INJ		-	$ -	8,484,966	7,701,377.11	$ 0.90765
	W/D		-	$ -	(16,992,813)	(29,054,199)	$ 1.70979
	NET	-	-	$ -	(8,507,847)	(21,352,821.73)	$ 2.50978

Michael Maggioli:
Begg. In Nov and through April- Reminder to update formula to pull Weighted Avg Rate (7 columns) instead of Commodity Rate (3 columns).

Michael Maggioli:

Begg. In May and through October- Reminder to update formula to pull Commodity Rate (3 columns) instead of Weighted avg. Rate (7 columns).

Payne:
Prepare schedule E for correct value for year end.

Maggioli: Includes YE adj to bring reserve replacement bal to 0. (Review to add if formula specific to period 12.)

To: M. Maggioli

From: C. Mann

Date: May 6, 2025

Re: PAD Storage Rates

The storage rates in effect for the 3rd Quarter of FY25 are derived as follows:

	($/Mcf)
Demand	**$2.5808**
Commodity	**$3.4138**
Total	**$5.9946**

Qtrly PA Storage Rates- Updated on Schedules Tab

Notes:

(1) Based on the PGC 2024 May Quarterly Filing of projected values.

(2) Using 1.051 Dth/Mcf conversion factor

(3) Storage Rates are derived at Delivered Volume to NFGDC with 6 months of actuals & 6 months of projections

CC:

N. Pasquarella
M. Duszenko
L. Petko
L. Metzger
M. Maggioli
D. Koch
T. Wesoloski

National Fuel Gas Distribution Corporation
Pennsylvania Division
Unit Storage Gas Cost ($/Mcf)
For the Twelve Months Ending September 2025

Conversion Factor **1.051**

	Actual Oct-24	Actual Nov-24	Actual Dec-24	Actual Jan-25	Actual Feb-25	Actual Mar-25	Projected Apr-25	Projected May-25	Projected Jun-25	Projected Jul-25	Projected Aug-25	Projected Sep-25	Total
Demand													
Upstream Purchased Gas Cost	3,094,737	3,118,166	3,140,652	3,140,931	3,123,608	3,122,428	3,129,731	3,124,664	3,139,780	3,134,735	3,149,831	3,159,902	37,579,165
Appalachian Gas Cost	0	0	0	0	0	0	0	0	0	0	0	0	0
Local Production Gas Cost	0	0	0	0	0	0	0	0	0	0	0	0	0
Storage Rental & Transportation Cost	1,225,420	1,224,494	1,223,784	1,222,950	1,221,729	1,220,886	1,632,822	1,632,711	1,632,711	1,632,711	1,632,711	1,632,711	17,135,640
Total Demand Cost	4,320,157	4,342,660	4,364,436	4,363,881	4,345,337	4,343,314	4,762,553	4,757,375	4,772,491	4,767,446	4,782,542	4,792,613	54,714,806
Less: Offsystem Sales Purchases	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Demand Cost ($)	**$4,320,157**	**$4,342,660**	**$4,364,436**	**$4,363,881**	**$4,345,337**	**$4,343,314**	**$4,762,553**	**$4,757,375**	**$4,772,491**	**$4,767,446**	**$4,782,542**	**$4,792,613**	**$54,714,806**
Total Receipt Volume (Mcf)	1,647,462	1,206,400	1,983,960	2,402,651	2,232,898	1,511,594	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	21,484,582
Less: Total Shrinkage (Mcf)	30,308	23,041	39,473	55,975	45,404	30,628	18,730	12,845	6,984	6,734	6,734	6,624	283,480
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	**1,617,154**	**1,183,359**	**1,944,487**	**2,346,676**	**2,187,494**	**1,480,966**	**1,466,387**	**1,959,396**	**2,400,279**	**1,569,915**	**1,575,501**	**1,469,489**	**21,201,103**
												Unit Storage Demand Gas Cost ($/Mcf) -	**$2.5808**
Commodity													
Upstream Purchased Gas Cost	3,073,152	2,700,516	6,110,405	10,732,567	9,337,142	5,409,159	7,750,190	7,306,220	4,790,853	5,080,301	4,789,145	4,403,669	71,483,318
Appalachian Gas Cost	0	0	0	0	0	0	23,552	19,947	20,162	22,363	22,825	21,738	130,587
Local Production Gas Cost	23,183	32,900	45,973	42,423	32,559	52,759	0	0	0	0	0	0	229,797
Storage Rental & Transportation Cost	30,208	26,068	49,580	87,691	59,530	33,899	3,699	50,702	49,058	49,156	44,273	49,682	533,546
Total Commodity Cost	3,126,543	2,759,484	6,205,958	10,862,681	9,429,231	5,495,816	7,777,441	7,376,869	4,860,073	5,151,820	4,856,243	4,475,089	72,377,249
Less: Offsystem Sales Purchases	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Commodity Cost ($)	**$3,126,543**	**$2,759,484**	**$6,205,958**	**$10,862,681**	**$9,429,231**	**$5,495,816**	**$7,777,441**	**$7,376,869**	**$4,860,073**	**$5,151,820**	**$4,856,243**	**$4,475,089**	**$72,377,249**
Total Receipt Volume (Mcf)	1,647,462	1,206,400	1,983,960	2,402,651	2,232,898	1,511,594	1,485,117	1,972,241	2,407,263	1,576,649	1,582,235	1,476,113	21,484,582
Less: Total Shrinkage (Mcf)	30,308	23,041	39,473	55,975	45,404	30,628	18,730	12,845	6,984	6,734	6,734	6,624	283,480
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	**1,617,154**	**1,183,359**	**1,944,487**	**2,346,676**	**2,187,494**	**1,480,966**	**1,466,387**	**1,959,396**	**2,400,279**	**1,569,915**	**1,575,501**	**1,469,489**	**21,201,103**
												Unit Storage Commodity Gas Cost ($/Mcf) -	**$3.4138**

Notes:
1). Based on the PGC 2024 May Quarterly Filing
2). Using 1.051 Mcf/Dth conversion factor
3. Storage rates are derived at Delivered Volume to NFGDC with 6 months of actuals & 6 months of projections

NFG Distribution Corporation
Inventory Cost Record as Booked
July 31, 2025
F:\Accounting\SOX Secured Files\Monthly Entries NFGDC\Monthly\STORAGE\Stor25\[Stor0725.xls]calc mcf

W/S B
Product 1902

APPROVED
By Shannon N Bolender at 11:33 am, Aug 12, 2025

	Current Month MCF	Rate	Amount	Since October 1st MCF	Rate *	Amount
UPDATE LINKS						
Balance Beginning of Period						
New York	A 11,462,950	1.3159	A $15,083,959.70	19,970,797	$1.2118	$24,200,576.02
Pennsylvania	4,877,786	(1.8210)	($8,882,403.93)	8,155,231	$1.3200	$10,764,567.87
	16,340,736	0.3795	$6,201,555.77	28,126,028	1.2432	$34,965,143.89
Input - New York	2,516,898	2.6555	$6,683,622.64	11,001,864	2.4197	$26,621,205.16
- Pennsylvania	983,533	4.5243	$4,449,753.51	4,701,344	C 5.6870	$26,736,543.33
Output - New York	138	B 2.6555	$366.46	16,992,951	1.7088	$29,054,565.30
- Pennsylvania	4,463	(476.4418)	($2,126,359.67)	6,999,719	C 5.6870	$39,807,401.95
Net - New York	2,516,760	2.6555	$6,683,256.18	(5,991,087)	0.4062	($2,433,360.14)
Net - Pennsylvania	979,070	6.7167	$6,576,113.18	(2,298,375)	5.6870	($13,070,858.62)
	3,495,830	3.7929	$13,259,369.36	(8,289,462)	1.8704	($15,504,218.76)
Loss	0	0.0000	0.00	0	0.0000	0.00
Balance End of Period to W/S C						
New York	D 13,979,710	$1.5571	$21,767,215.88	13,979,710	$1.5571	$21,767,215.88
Pennsylvania	5,856,856	($0.3938)	($2,306,290.75)	5,856,856	($0.3938)	($2,306,290.75)
TOTAL	19,836,566	$0.9811	$19,460,925.13	19,836,566	$0.9811	$19,460,925.13
* Rate per Valuation Department	13,979,710	0	0		-	OK
	5,856,856	0	0		-	OK

Michael Maggioli:
Updated 11/24

UPDATE LINKS		Note: Links neede
A 8,484,966	A 19,937,563	Do not use links for
3,717,811	22,286,790	
16,992,813	29,054,199	
6,995,256	41,933,762	
NY (8,507,847)	(9,116,616.32)	
PA (3,277,445)	(19,646,971.80)	

Michael Maggioli:
10/31/24- Updated with 9/30/24 balances

UPDATE FIRST MONTH OF FISCAL YEAR

Gas Stored Underground YTD (9/30/2024)				
New York	19,970,797	$	1.211798	$24,200,576.02
Pennsylvania	8,155,231	$	1.319959	10,764,567.87
	28,126,028	$	1.243160	$34,965,143.89

Gas Stored Underground Current

New York	13,979,710	$	1.5571	$21,767,215.88
Pennsylvania	5,856,856	$	(0.3938)	($2,306,290.75)
	19,836,566		$0.9811	$19,460,925.13

Balance Sheet Presentation
Gas Stored Underground Current (LIFO)

New York	13,979,710		$1.5571	$21,767,215.88
Pennsylvania	5,856,856		($0.3938)	($2,306,290.75)
Add: Reserve For Gas Replacement				
New York			($10,808,260.78) •	(Positive amount recorded to Account 253551 - Negative amount recorded to 591800)
Pennsylvania			$6,897,589.25 •	(Positive amount recorded to Account 253552 - Negative amount recorded to 591800)
			($3,910,671.53)	
Gas Stored Underground Current	19,836,566		$0.7839	$15,550,253.60 Agrees to B/S a/c # 164100
New York	13,979,710		$0.7839	$10,958,955.10 - OK
Pennsylvania	5,856,856		$0.7839	$4,591,298.50 - OK
	19,836,566		$0.7839	$15,550,253.60

Ties to layer rate table (next page)

Michael Maggioli:
Updated 11/24

UPDATE LINKS		Note: Links neede
Prior Month YTD		Do not use links for
A 8,484,966	A $19,937,562.52	
3,717,811	$22,286,769.82	
12,202,777	$ 42,224,372.34	
16,992,813	$29,054,198.84	
6,995,256	$41,933,761.62	
23,988,069	$ 70,987,960.46	

Purchased Gas Sold	Mcf	Monthly	Dollars	Mcf	YTD	Dollars
Injections						
New York	2,516,898		$6,683,622.64	11,001,864		$26,621,205.16
Pennsylvania	983,533		$4,449,753.51	4,701,344		$26,736,543.33
	3,500,431		$11,133,376.15	15,703,208		$53,357,748.49
Withdrawals						
New York	138		$366.46	16,992,951		$29,054,565.30
Pennsylvania	4,463		($2,126,359.67)	6,999,719		$39,807,401.95
	4,601		($2,125,993.21)	23,992,670		$68,861,967.25

A = Agrees to prior month ending balance
B = Agrees to calculated NY storage rate
C = Agrees to calculated PA storage rate
D = Agrees to estimated ending storage inventory balance

8/8/2025 10:53 AM

NFG Distribution Corporation
Storage Gas Inventory Priced at Layer Rates
7/31/2025

W/S C
PRODUCT# 1902

**Please Note: First month following fiscal YE (Oct) when adding PY layer ensure that columns R-W are updated (copy & paste values) w/ PY ending balances (Sep 30 current month amounts at layer rates (X-AA). Also please note that formulas need to be reviewed & updated in rows V45-Z71 to ensure correct prior month reserve balance is referenced. The cell reference will shift due to added layer rate insert in Oct.

**Please Note: First month following fiscal YE (Oct)- Make sure to update the formulas of new years layer rate row for X,Y,Z,AA columns.

Layer Year	MCF 9/30/24 NY	MCF 9/30/24 PA	Layer Rate NY	Layer Rate PA	Amount 9/30/24 NY	Amount 9/30/24 PA	CURRENT MONTH MCF NY	CURRENT MONTH MCF PA	Amount at Layer Rates NY	Amount at Layer Rates PA
2025							-	-	-	-
2024	702,252	288,514	1.6447065	4.823600061	$ 1,154,998.42	$ 1,391,676.15	-	-	-	-
2023	92,382	-	1.6286354	0	$ 150,456.59	$ -	-	-	0.00	-
2022	-	-	0	0	$ -	$ -	-	-	0.00	-
2021	-	-	0	0	$ -	$ -	-	-	0.00	0.00
2020	551,946	497,240	1.4783043	3.7243000	$ 815,944.14	$ 1,851,870.93	0	0	0.00	0.00
2019	845,192	29,807	2.1754511	4.6127003	$ 1,838,673.90	$ 137,490.76	0	0	0.00	0.00
2018	455,033	-	2.5472239	0	$ 1,159,070.95	$ -	0	0	0.00	0.00
2017	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2016	-	150,371	0	3.8719000	$ -	$ 582,221.47	0	0	0.00	0.00
2015	-	153,235	1.5312976	4.1997000	$ -	$ 643,541.03	0	0	0.00	0.00
2014	-	122,940	0	6.0065144	$ -	$ 738,440.88	0	0	0.00	0.00
2013	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2012	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2011	517,091	-	4.9097543	0	$ 2,538,789.77	$ -	0	0	0.00	0.00
2010	500,421	-	5.2178791	0	$ 2,611,136.27	$ -	0	0	0.00	0.00
2007	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2003	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2002	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2001	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2000	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1999	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1997	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1996	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1995	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1994	391,383	-	3.7185166	3.7185166	$ 1,455,365.19	$ -	0	0	0.00	0.00
1993	15,915,097	6,913,124	0.7839186	0.7839186	$ 12,476,140.78	$ 5,419,326.65	13,979,710	5,856,856	10,958,955.10	4,591,299
	19,970,797	8,155,231	$ 1.21180	$ 1.31996	24,200,576.02	10,764,567.87	13,979,710	5,856,856	$ 10,958,955.10	$ 4,591,298.50
							Per W/S B	Per W/S B	Per W/S B	Per W/S B

Layers agree to 9/30/2024 file

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references- only if adding new row across the entire spreadsheet. FY 25 only added row within columns of table above so did not shift cell references.

Computation of Reserve for Gas Replacement

0.783918611

		NY	PA	TOTAL	
Inventory at FIFO Basis		21,767,215.88	(2,306,290.75)	19,460,925.13	per W/S B
Inventory at Layer Rates		10,958,955.10	4,591,298.50	15,550,253.60	
Required Reserve	Jul 31, 2025	$0.00	$6,897,589.25	$0.00	
Required Reserve as of	Jul 31, 2025	$0.00	$6,897,589.25	$6,897,589.25	
Required Reserve as of	Jun 30, 2025	$0.00	$12,706,191.24	$12,706,191.24	UPDATE
					LINK
Adjustment for Current Month		$0.00	($5,808,601.99)	($5,808,601.99)	

NY: LIFO < FIFO
PA: LIFO > FIFO

Michael Maggioli: Oct: Make sure to update cell ref from shift due to layer rate add in above table.

Accounting Entry:

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references.

1774-164101	Gas Storage	$0.00
4776-164102	Gas Storage	(5,808,601.99)
1774-253551	Reserve for Gas Replacement	0.00
4776-253552	Reserve for Gas Replacement	5,808,601.99

Accounting Entry (NY Only):

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell

			Dr. / (Cr.)	
1774-164101	Gas Storage		$ (10,808,260.78)	
1774-591800	Gas Injected into Storage (pge)		10,808,260.78	
Booked prior month		6/30/25	$ (6,097,939.60)	UPDATE
NY Current Month Entry			(4,710,321.18)	LINK

-to adjust NY inventory balance for impact of negative reserve for gas replacement.

Accounting Entry (PA Only):

			Dr. / (Cr.)	
1774-164101	Gas Storage		$ -	
1774-591800	Gas Injected into Storage (pge)		-	
Booked prior month		6/30/25	$ -	UPDATE
PA Current Month Entry			-	LINK

-to adjust PA inventory balance for impact of negative reserve for gas replacement.

Michael Maggioli: This was adjusted during Oct ME to reflect that we did

8/8/2025 10:55 AM

NY Rate - July 2025

$6,683,623/2,516,898 MCF = $2.66/mcf - NY RATE

Calculation of FYTD RATE to Produce the Monthly Storage Journal Entry for NFGDC-NY

		MCF - Month	$$ - Month	COMMODITY Rate - Month	MCF - FYTD	$$ - FYTD	Rate - FYTD	
								1
October-24	INJ	1,625,125	2,878,909	$ 1.77150	1,625,125	2,878,909	$ 1.77150	2
	W/D	(210,332)	(372,603)	$ 1.77150	(210,332)	(372,603)	$ 1.77150	3
	NET	1,414,793	2,506,306	$ 1.77150	1,414,793	2,506,306	$ 1.77150	4
November-24	INJ	375,892	623,259	$ 1.65808	2,001,017	3,502,168	$ 1.75019	5
	W/D	(1,346,381)	(2,232,409)	$ 1.65808	(1,556,713)	(2,605,012)	$ 1.67341	6
	NET	(970,489)	(1,609,149)	$ 1.65808	444,304	897,156	$ 2.01924	7
December-24	INJ	35,005	58,041	$ 1.65808	2,036,022	3,560,209	$ 1.74861	8
	W/D	(3,141,052)	(5,208,119)	$ 1.65808	(4,697,765)	(7,813,131)	$ 1.66316	9
	NET	(3,106,047)	(5,150,078)	$ 1.65808	(2,661,743)	(4,252,922)	$ 1.59780	10
January-25	INJ	11,962	19,834	$ 1.65808	2,047,984	3,580,043	$ 1.74808	11
	W/D	(4,473,445)	(7,417,335)	$ 1.65808	(9,171,210)	(15,230,466)	$ 1.66068	12
	NET	(4,461,483)	(7,397,501)	$ 1.65808	(7,123,226)	(11,650,422)	$ 1.63555	13
February-25	INJ	165,131	273,801	$ 1.65808	2,213,115	3,853,844	$ 1.74137	14
	W/D	(4,310,008)	(7,146,343)	$ 1.65808	(13,481,218)	(22,376,809)	$ 1.65985	15
	NET	(4,144,877)	(6,872,542)	$ 1.65808	(11,268,103)	(18,522,965)	$ 1.64384	16
March-25	INJ	103,589	171,759	$ 1.65808	2,316,704	4,025,603	$ 1.73764	17
	W/D	(3,013,907)	(4,997,302)	$ 1.65808	(16,495,125)	(27,374,111)	$ 1.65953	18
	NET	(2,910,318)	(4,825,543)	$ 1.65808	(14,178,421)	(23,348,508)	$ 1.64676	19
April-25	INJ	1,233,651	4,034,039	$ 3.27000	3,550,355	8,059,642	$ 2.27009	20
	W/D	(567,312)	(1,855,110)	$ 3.27000	(17,062,437)	(29,229,221)	$ 1.71307	21
	NET	666,339	2,178,929	3.27	(13,512,082)	(21,169,579)	$ 1.56671	22
May-25	INJ	1,978,407	4,950,964	$ 2.50250	5,528,762	13,010,605	$ 2.35326	23
	W/D	74,572	186,616	$ 2.50250	(16,987,865)	(29,042,605)	$ 1.70961	24
	NET	2,052,979	5,137,580	$ 2.50250	(11,459,103)	(16,031,999)	$ 1.39906	25
June-25	INJ	2,956,204	6,926,977	$ 2.34320	8,484,966	19,937,583	$ 2.34975	26
	W/D	(4,948)	(11,594)	$ 2.34320	(16,992,813)	(29,054,199)	$ 1.70979	27
	NET	2,951,256	6,915,383	$ 2.34320	(8,507,847)	(9,116,616)	$ 1.07155	28
July-25	INJ	2,516,898	6,683,623	$ 2.65550	11,001,864	26,621,205	$ 2.41970	29
	W/D	(138)	(366)	$ 2.65550	(16,992,951)	(29,054,565)	$ 1.70980	30
	NET	2,516,760	6,683,256	$ 2.65550	(5,991,087)	(2,433,360)	$ 0.40616	31
August-25	INJ		-	$ -	11,001,864	26,621,205	$ 2.41970	32
	W/D		-	$ -	(16,992,951)	(29,054,565)	$ 1.70980	33
	NET	-	-	$ -	(5,991,087)	(2,433,360)	$ 0.40616	34
September-25	INJ		-	$ -	11,001,864	13,749,892.30	$ 1.24978	35
	W/D		-	$ -	(16,992,951)	(29,054,565)	$ 1.70980	36
	NET	-	-	$ -	(5,991,087)	(15,304,673.00)	$ 2.55457	37

Michael Maggioli:
Begg. In Nov and through April- Reminder to update formula to pull Weighted Avg Rate (7 columns) instead of Commodity Rate (3 columns).

Michael Maggioli:

Begg. In May and through October- Reminder to update formula to pull Commodity Rate (3 columns) instead of Weighted avg. Rate (7 columns).

Payne:
Prepare schedule E for correct value for year end.

Maggioli: Includes YE adj to bring reserve replacement bal to 0. (Review to add if formula specific to period 12.)

To: M. Maggioli

From: C. Mann

Date: August 4, 2025

Re: PAD Storage Rates

The storage rates in effect for the 4th Quarter of FY25 are derived as follows:

	($/Mcf)	
Demand	**$2.5798**	
Commodity	**$3.1072**	Qtrly PA Storage Rates- Updated on Schedules Tab
Total	**$5.6870**	

Notes:

(1) Based on the PGC 2025 August Compliance Filing of projected values.

(2) Using 1.049 Dth/Mcf conversion factor

(3) Storage Rates are derived at Delivered Volume to NFGDC with 9 months of actuals & 3 months of projections

CC:

N. Pasquarella
M. Duszenko
L. Petko
L. Metzger
D. Koch
T. Wesoloski

National Fuel Gas Distribution Corporation
Pennsylvania Division
Unit Storage Gas Cost ($/Mcf)
For the Twelve Months Ending September 2025

Conversion Factor 1.049

	Actual Oct-24	Actual Nov-24	Actual Dec-24	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Projected Jul-25	Projected Aug-25	Projected Sep-25	Total
Demand													
Upstream Purchased Gas Cost	3,094,737	3,118,166	3,140,652	3,140,931	3,123,608	3,122,428	3,162,463	3,154,802	3,059,569	3,126,520	3,136,751	3,126,680	37,507,308
Appalachian Gas Cost	0	0	0	0	0	0	0	0	0	0	0	0	0
Local Production Gas Cost	0	0	0	0	0	0	0	0	0	0	0	0	0
Storage Rental & Transportation Cost	1,225,420	1,224,494	1,223,784	1,222,950	1,221,729	1,220,886	1,359,468	1,359,334	1,283,013	1,473,627	1,473,627	1,473,627	15,761,960
Total Demand Cost	4,320,157	4,342,660	4,364,436	4,363,881	4,345,337	4,343,314	4,521,931	4,514,137	4,342,583	4,600,147	4,610,378	4,600,307	53,269,268
Less: Offsystem Sales Purchases	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Demand Cost ($)	**$4,320,157**	**$4,342,660**	**$4,364,436**	**$4,363,881**	**$4,345,337**	**$4,343,314**	**$4,521,931**	**$4,514,137**	**$4,342,583**	**$4,600,147**	**$4,610,378**	**$4,600,307**	**$53,269,268**
Total Receipt Volume (Mcf)	1,721,221	1,208,700	1,987,743	2,407,232	2,237,155	1,514,476	1,995,953	1,779,732	1,601,877	1,429,410	1,589,054	1,527,436	20,999,989
Less: Total Shrinkage (Mcf)	30,366	23,085	39,548	56,082	45,491	30,686	41,300	38,657	34,788	2,938	4,195	4,059	351,196
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	**1,690,855**	**1,185,615**	**1,948,194**	**2,351,150**	**2,191,664**	**1,483,789**	**1,954,653**	**1,741,075**	**1,567,089**	**1,426,472**	**1,584,859**	**1,523,377**	**20,648,792**
										Unit Storage Demand Gas Cost ($/Mcf) -			**$2.5798**
Commodity													
Upstream Purchased Gas Cost	3,073,152	2,700,516	6,110,405	10,732,567	9,337,142	5,409,159	6,304,443	4,655,056	4,065,987	3,548,051	3,860,415	3,379,541	63,176,434
Appalachian Gas Cost	0	0	0	0	0	0	0	0	0	30,057	31,194	0	61,251
Local Production Gas Cost	23,183	32,900	45,973	42,423	32,559	52,759	54,754	42,761	37,798	0	0	0	365,110
Storage Rental & Transportation Cost	30,208	26,068	49,580	87,691	59,530	33,899	39,538	42,336	47,233	42,997	49,800	47,245	556,125
Total Commodity Cost	3,126,543	2,759,484	6,205,958	10,862,681	9,429,231	5,495,816	6,398,735	4,740,153	4,151,017	3,621,105	3,941,409	3,426,786	64,158,920
Less: Offsystem Sales Purchases	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Commodity Cost ($)	**$3,126,543**	**$2,759,484**	**$6,205,958**	**$10,862,681**	**$9,429,231**	**$5,495,816**	**$6,398,735**	**$4,740,153**	**$4,151,017**	**$3,621,105**	**$3,941,409**	**$3,426,786**	**$64,158,920**
Total Receipt Volume (Mcf)	1,721,221	1,208,700	1,987,743	2,407,232	2,237,155	1,514,476	1,995,953	1,779,732	1,601,877	1,429,410	1,589,054	1,527,436	20,999,989
Less: Total Shrinkage (Mcf)	30,366	23,085	39,548	56,082	45,491	30,686	41,300	38,657	34,788	2,938	4,195	4,059	351,196
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	**1,690,855**	**1,185,615**	**1,948,194**	**2,351,150**	**2,191,664**	**1,483,789**	**1,954,653**	**1,741,075**	**1,567,089**	**1,426,472**	**1,584,859**	**1,523,377**	**20,648,792**
										Unit Storage Commodity Gas Cost ($/Mcf) -			**$3.1072**

Notes:
1). Based on the PGC 2025 August Compliance Filing
2). Using 1.049 Mcf/Dth conversion factor
3. Storage rates are derived at Delivered Volume to NFGDC with 9 months of actuals & 3 months of projections

NFG Distribution Corporation
Inventory Cost Record as Booked
August 31, 2025
F:\Accounting\SOX Secured Files\Monthly Entries NFGDC\Monthly\STORAGE\Stor25\[Stor0825.xls]calc mcf

W/S B
Product 1902

APPROVED
By Shannon N Bolender at 10:05 am, Sep 11, 2025

	Current Month MCF	Rate	Amount	Since October 1st MCF	Rate *	Amount
UPDATE LINKS						
Balance Beginning of Period						
New York	A 13,979,710	1.5571	A $21,767,215.88	19,970,797	$1.2118	$24,200,576.02
Pennsylvania	5,856,856	(0.3938)	($2,306,290.75)	8,155,231	$1.3200	$10,764,567.87
	19,836,566	0.9811	$19,460,925.13	28,126,028	1.2432	$34,965,143.89
Input - New York	2,858,630	2.4979	$7,140,571.87	13,860,494	2.4358	$33,761,777.03
- Pennsylvania	960,186	5.6870	$5,460,577.78	5,661,530	C 5.6870	$32,197,121.11
Output - New York	13,314	B 2.4979	$33,257.04	17,006,265	1.7104	$29,087,822.34
- Pennsylvania	1,276	5.6870	$7,256.62	7,000,995	C 5.6870	$39,814,658.57
Net - New York	2,845,316	2.4979	$7,107,314.83	(3,145,771)	(1.4858)	$4,673,954.69
Net - Pennsylvania	958,910	5.6870	$5,453,321.16	(1,339,465)	5.6870	($7,617,537.46)
	3,804,226	3.3018	$12,560,635.99	(4,485,236)	0.6563	($2,943,582.77)
Loss	0	0.0000	0.00	0	0.0000	0.00
Balance End of Period to W/S C						
New York	D 16,825,026	$1.7162	$28,874,530.71	16,825,026	$1.7162	$28,874,530.71
Pennsylvania	6,815,766	$0.4617	$3,147,030.41	6,815,766	$0.4617	$3,147,030.41
TOTAL	23,640,792	$1.3545	$32,021,561.12	23,640,792	$1.3545	$32,021,561.12
* Rate per Valuation Department	16,825,026	0			-	OK
	6,815,766	0			-	OK

Michael Maggioli: Updated 11/24

UPDATE LINKS		Note: Links neede
A 11,001,864	A 26,621,205	Do not use links for
4,701,344	26,736,543	
16,992,951	29,054,565	
6,999,719	39,807,402	
NY (5,991,087)	(2,433,360.14)	
PA (2,298,375)	(13,070,858.62)	

Michael Maggioli: 10/31/24- Updated with 9/30/24 balances

UPDATE FIRST MONTH OF FISCAL YEAR

Gas Stored Underground YTD (9/30/2024)

New York	19,970,797	$	1.211798	$24,200,576.02
Pennsylvania	8,155,231	$	1.319959	10,764,567.87
	28,126,028	$	1.243160	$34,965,143.89

Gas Stored Underground Current

New York	16,825,026	$	1.7162	$28,874,530.71
Pennsylvania	6,815,766	$	0.4617	$3,147,030.41
	23,640,792		$1.3545	$32,021,561.12

Balance Sheet Presentation

Gas Stored Underground Current (LIFO)				
New York	16,825,026		$1.7162	$28,874,530.71
Pennsylvania	6,815,766		$0.4617	$3,147,030.41
Add: Reserve For Gas Replacement				
New York				($12,242,899.17) (Positive amount recorded to Account 253551 - Negative amount recorded to 591800)
Pennsylvania				$2,195,975.49 (Positive amount recorded to Account 253552 - Negative amount recorded to 591800)
				($10,046,923.68)
Gas Stored Underground Current	23,640,792		$0.9295	$21,974,637.44 Agrees to B/S a/c # 164100
New York	16,825,026		$0.9885	$16,631,631.54 - OK
Pennsylvania	6,815,766		$0.7839	$5,343,005.90 - OK
	23,640,792		$0.9295	$21,974,637.44

Ties to layer rate table (next page)

Michael Maggioli: Updated 11/24

UPDATE LINKS		Note: Links neede
Prior Month YTD		Do not use links for
A 11,001,864	A $26,621,205.16	
4,701,344	$26,736,543.33	
15,703,208	$ 53,357,748.49	
16,992,951	$29,054,565.30	
6,999,719	$39,807,401.95	
23,992,670	$ 68,861,967.25	

Purchased Gas Sold	Mcf	Monthly	Dollars	Mcf	YTD	Dollars
Injections						
New York	2,858,630		$7,140,571.87	13,860,494		$33,761,777.03
Pennsylvania	960,186		$5,460,577.78	5,661,530		$32,197,121.11
	3,818,816		$12,601,149.65	19,522,024		$65,958,898.14
Withdrawals						
New York	13,314		$33,257.04	17,006,265		$29,087,822.34
Pennsylvania	1,276		$7,256.62	7,000,995		$39,814,658.57
	14,590		$40,513.66	24,007,260		$68,902,480.91

A = Agrees to prior month ending balance
B = Agrees to calculated NY storage rate
C = Agrees to calculated PA storage rate
D = Agrees to estimated ending storage inventory balance

NFG Distribution Corporation
Storage Gas Inventory Priced at Layer Rates
8/31/2025

W/S C
PRODUCT# 1902

**Please Note: First month following fiscal YE (Oct) when adding PY layer ensure that columns R-W are updated (copy & paste values) w/ PY ending balances (Sep 30 current month amounts at layer rates (X-AA). Also please note that formulas need to be reviewed & updated in rows V45-Z71 to ensure correct prior month reserve balance is referenced. The cell reference will shift due to added layer rate insert in Oct.

**Please Note: First month following fiscal YE (Oct)- Make sure to update the formulas of new years layer rate row for X,Y,Z,AA columns.

Layer Year	MCF 9/30/24 NY	MCF 9/30/24 PA	Layer Rate NY	Layer Rate PA	Amount 9/30/24 NY	Amount 9/30/24 PA	CURRENT MONTH MCF NY	CURRENT MONTH MCF PA	CURRENT MONTH Amount at Layer Rates NY	CURRENT MONTH Amount at Layer Rates PA
2025							-	-	-	-
2024	702,252	288,514	1.6447065	4.823600061	$ 1,154,998.42	$ 1,391,676.15	-	-	-	-
2023	92,382	-	1.6286354	0	$ 150,456.59	$ -	-	-	0.00	-
2022	-	-	0	0	$ -	$ -	-	-	0.00	-
2021	-	-	0	0	$ -	$ -	-	-	0.00	0.00
2020	551,946	497,240	1.4783043	3.7243000	$ 815,944.14	$ 1,851,870.93	0	0	0.00	0.00
2019	845,192	29,807	2.1754511	4.6127003	$ 1,838,673.90	$ 137,490.76	0	0	0.00	0.00
2018	455,033	-	2.5472239	0	$ 1,159,070.95	$ -	0	0	0.00	0.00
2017	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2016	-	150,371	0	3.8719000	$ -	$ 582,221.47	0	0	0.00	0.00
2015	-	153,235	1.5312976	4.1997000	$ -	$ 643,541.03	0	0	0.00	0.00
2014	-	122,940	0	6.0065144	$ -	$ 738,440.88	0	0	0.00	0.00
2013	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2012	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2011	517,091	-	4.9097543	0	$ 2,538,789.77	$ -	18,125	0	88,989.30	0.00
2010	500,421	-	5.2178791	0	$ 2,611,136.27	$ -	500,421	0	2,611,136.27	0.00
2007	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2003	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2002	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2001	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2000	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1999	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1997	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1996	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1995	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1994	391,383	-	3.7185166	3.7185166	$ 1,455,365.19	$ -	391,383	0	1,455,365.19	0.00
1993	15,915,097	6,913,124	0.7839186	0.7839186	$ 12,476,140.78	$ 5,419,326.65	15,915,097	6,815,766	12,476,140.78	5,343,006
	19,970,797	8,155,231	$ 1.21180	$ 1.31996	24,200,576.02	10,764,567.87	16,825,026	6,815,766	$ 16,631,631.54	$ 5,343,005.90
									Per W/S B	Per W/S B

Layers agree to 9/30/2024 file

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references- only if adding new row across the entire spreadsheet. FY 25 only added row within columns of table above so did not shift cell references.

Computation of Reserve for Gas Replacement

0.988505529

		NY	PA	TOTAL	
Inventory at FIFO Basis		28,874,530.71	3,147,030.41	32,021,561.12	per W/S B
Inventory at Layer Rates		16,631,631.54	5,343,005.90	21,974,637.44	
Required Reserve	Aug 31, 2025	$0.00	$2,195,975.49	$0.00	
Required Reserve as of	Aug 31, 2025	$0.00	$2,195,975.49	$2,195,975.49	
Required Reserve as of	Jul 31, 2025	$0.00	$6,897,589.25	$6,897,589.25	UPDATE
					LINK
Adjustment for Current Month		$0.00	($4,701,613.76)	($4,701,613.76)	

NY: LIFO < FIFO
PA: LIFO > FIFO

Michael Maggioli: Oct: Make sure to update cell ref from shift due to layer rate add in above table.

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references.

Accounting Entry:

1774-164101	Gas Storage	$0.00
4776-164102	Gas Storage	(4,701,613.76)
1774-253551	Reserve for Gas Replacement	0.00
4776-253552	Reserve for Gas Replacement	4,701,613.76

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell

Accounting Entry (NY Only):

			Dr. / (Cr.)	
1774-164101	Gas Storage		$ (12,242,899.17)	
1774-591800	Gas Injected into Storage (pge)		12,242,899.17	
Booked prior month		7/31/25	$ (10,808,260.78)	UPDATE
NY Current Month Entry			(1,434,638.39)	LINK

-to adjust NY inventory balance for impact of negative reserve for gas replacement.

Accounting Entry (PA Only):

			Dr. / (Cr.)	
1774-164101	Gas Storage		$ -	
1774-591800	Gas Injected into Storage (pge)		-	
Booked prior month		7/31/25	$ -	UPDATE
PA Current Month Entry			-	LINK

-to adjust PA inventory balance for impact of negative reserve for gas replacement.

Michael Maggioli: This was adjusted during Oct ME to reflect that we did

9/10/2025 11:30 AM

NY Rate - August 2025

$7,140,572/2,858,630 MCF = $2.497/mcf - NY RATE

Calculation of FYTD RATE to Produce the Monthly Storage Journal Entry for NFGDC-NY

		MCF - Month	$$ - Month	COMMODITY Rate - Month	MCF - FYTD	$$ - FYTD	Rate - FYTD
October-24	INJ	1,625,125	2,878,909	$ 1.77150	1,625,125	2,878,909	$ 1.77150
	W/D	(210,332)	(372,603)	$ 1.77150	(210,332)	(372,603)	$ 1.77150
	NET	1,414,793	2,506,306	$ 1.77150	1,414,793	2,506,306	$ 1.77150
November-24	INJ	375,892	623,259	$ 1.65808	2,001,017	3,502,168	$ 1.75019
	W/D	(1,346,381)	(2,232,409)	$ 1.65808	(1,556,713)	(2,605,012)	$ 1.67341
	NET	(970,489)	(1,609,149)	$ 1.65808	444,304	897,156	$ 2.01924
December-24	INJ	35,005	58,041	$ 1.65808	2,036,022	3,560,209	$ 1.74861
	W/D	(3,141,052)	(5,208,119)	$ 1.65808	(4,697,765)	(7,813,131)	$ 1.66316
	NET	(3,106,047)	(5,150,078)	$ 1.65808	(2,661,743)	(4,252,922)	$ 1.59780
January-25	INJ	11,962	19,834	$ 1.65808	2,047,984	3,580,043	$ 1.74808
	W/D	(4,473,445)	(7,417,335)	$ 1.65808	(9,171,210)	(15,230,466)	$ 1.66068
	NET	(4,461,483)	(7,397,501)	$ 1.65808	(7,123,226)	(11,650,422)	$ 1.63555
February-25	INJ	165,131	273,801	$ 1.65808	2,213,115	3,853,844	$ 1.74137
	W/D	(4,310,008)	(7,146,343)	$ 1.65808	(13,481,218)	(22,376,809)	$ 1.65985
	NET	(4,144,877)	(6,872,542)	$ 1.65808	(11,268,103)	(18,522,965)	$ 1.64384
March-25	INJ	103,589	171,759	$ 1.65808	2,316,704	4,025,603	$ 1.73764
	W/D	(3,013,907)	(4,997,302)	$ 1.65808	(16,495,125)	(27,374,111)	$ 1.65953
	NET	(2,910,318)	(4,825,543)	$ 1.65808	(14,178,421)	(23,348,508)	$ 1.64676
April-25	INJ	1,233,651	4,034,039	$ 3.27000	3,550,355	8,059,642	$ 2.27009
	W/D	(567,312)	(1,855,110)	$ 3.27000	(17,062,437)	(29,229,221)	$ 1.71307
	NET	666,339	2,178,929	3.27	(13,512,082)	(21,169,579)	$ 1.56671
May-25	INJ	1,978,407	4,950,964	$ 2.50250	5,528,762	13,010,605	$ 2.35326
	W/D	74,572	186,616	$ 2.50250	(16,987,865)	(29,042,605)	$ 1.70961
	NET	2,052,979	5,137,580	$ 2.50250	(11,459,103)	(16,031,999)	$ 1.39906
June-25	INJ	2,956,204	6,926,977	$ 2.34320	8,484,966	19,937,583	$ 2.34975
	W/D	(4,948)	(11,594)	$ 2.34320	(16,992,813)	(29,054,199)	$ 1.70979
	NET	2,951,256	6,915,383	$ 2.34320	(8,507,847)	(9,116,616)	$ 1.07155
July-25	INJ	2,516,898	6,683,623	$ 2.65550	11,001,864	26,621,205	$ 2.41970
	W/D	(138)	(366)	$ 2.65550	(16,992,951)	(29,054,565)	$ 1.70980
	NET	2,516,760	6,683,256	$ 2.65550	(5,991,087)	(2,433,360)	$ 0.40616
August-25	INJ	2,858,630	7,140,572	$ 2.49790	13,860,494	33,761,777	$ 2.43583
	W/D	(13,314)	(33,257)	$ 2.49790	(17,006,265)	(29,087,822)	$ 1.71042
	NET	2,845,316	7,107,315	$ 2.49790	(3,145,771)	4,673,955	$ (1.48579)
September-25	INJ		-	$ -	13,860,494	21,097,697.57	$ 1.52215
	W/D		-	$ -	(17,006,265)	(29,087,822)	$ 1.71042
	NET	-	-	$ -	(3,145,771)	(7,990,124.77)	$ 2.53996

Michael Maggioli:
Begg. In Nov and through April- Reminder to update formula to pull Weighted Avg Rate (7 columns) instead of Commodity Rate (3 columns).

Michael Maggioli:

Begg. In May and through October- Reminder to update formula to pull Commodity Rate (3 columns) instead of Weighted avg. Rate (7 columns).

Payne:
Prepare schedule E for correct value for year end.

Maggioli: Includes YE adj to bring reserve replacement bal to 0. (Review to add if formula specific to period 12.)

To: M. Maggioli

From: C. Mann

Date: August 4, 2025

Re: PAD Storage Rates

The storage rates in effect for the 4th Quarter of FY25 are derived as follows:

	($/Mcf)	
Demand	**$2.5798**	
Commodity	**$3.1072**	Qtrly PA Storage Rates- Updated on Schedules Tab
Total	**$5.6870**	

Notes:

(1) Based on the PGC 2025 August Compliance Filing of projected values.

(2) Using 1.049 Dth/Mcf conversion factor

(3) Storage Rates are derived at Delivered Volume to NFGDC with 9 months of actuals & 3 months of projections

CC:

N. Pasquarella
M. Duszenko
L. Petko
L. Metzger
D. Koch
T. Wesoloski

National Fuel Gas Distribution Corporation
Pennsylvania Division
Unit Storage Gas Cost ($/Mcf)
For the Twelve Months Ending September 2025

Conversion Factor 1.049

	Actual Oct-24	Actual Nov-24	Actual Dec-24	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Projected Jul-25	Projected Aug-25	Projected Sep-25	Total
Demand													
Upstream Purchased Gas Cost	3,094,737	3,118,166	3,140,652	3,140,931	3,123,608	3,122,428	3,162,463	3,154,802	3,059,569	3,126,520	3,136,751	3,126,680	37,507,308
Appalachian Gas Cost	0	0	0	0	0	0	0	0	0	0	0	0	0
Local Production Gas Cost	0	0	0	0	0	0	0	0	0	0	0	0	0
Storage Rental & Transportation Cost	1,225,420	1,224,494	1,223,784	1,222,950	1,221,729	1,220,886	1,359,468	1,359,334	1,283,013	1,473,627	1,473,627	1,473,627	15,761,960
Total Demand Cost	4,320,157	4,342,660	4,364,436	4,363,881	4,345,337	4,343,314	4,521,931	4,514,137	4,342,583	4,600,147	4,610,378	4,600,307	53,269,268
Less: Offsystem Sales Purchases	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Demand Cost ($)	**$4,320,157**	**$4,342,660**	**$4,364,436**	**$4,363,881**	**$4,345,337**	**$4,343,314**	**$4,521,931**	**$4,514,137**	**$4,342,583**	**$4,600,147**	**$4,610,378**	**$4,600,307**	**$53,269,268**
Total Receipt Volume (Mcf)	1,721,221	1,208,700	1,987,743	2,407,232	2,237,155	1,514,476	1,995,953	1,779,732	1,601,877	1,429,410	1,589,054	1,527,436	20,999,989
Less: Total Shrinkage (Mcf)	30,366	23,085	39,548	56,082	45,491	30,686	41,300	38,657	34,788	2,938	4,195	4,059	351,196
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	**1,690,855**	**1,185,615**	**1,948,194**	**2,351,150**	**2,191,664**	**1,483,789**	**1,954,653**	**1,741,075**	**1,567,089**	**1,426,472**	**1,584,859**	**1,523,377**	**20,648,792**
										Unit Storage Demand Gas Cost ($/Mcf) -			**$2.5798**
Commodity													
Upstream Purchased Gas Cost	3,073,152	2,700,516	6,110,405	10,732,567	9,337,142	5,409,159	6,304,443	4,655,056	4,065,987	3,548,051	3,860,415	3,379,541	63,176,434
Appalachian Gas Cost	0	0	0	0	0	0	0	0	0	30,057	31,194	0	61,251
Local Production Gas Cost	23,183	32,900	45,973	42,423	32,559	52,759	54,754	42,761	37,798	0	0	0	365,110
Storage Rental & Transportation Cost	30,208	26,068	49,580	87,691	59,530	33,899	39,538	42,336	47,233	42,997	49,800	47,245	556,125
Total Commodity Cost	3,126,543	2,759,484	6,205,958	10,862,681	9,429,231	5,495,816	6,398,735	4,740,153	4,151,017	3,621,105	3,941,409	3,426,786	64,158,920
Less: Offsystem Sales Purchases	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Commodity Cost ($)	**$3,126,543**	**$2,759,484**	**$6,205,958**	**$10,862,681**	**$9,429,231**	**$5,495,816**	**$6,398,735**	**$4,740,153**	**$4,151,017**	**$3,621,105**	**$3,941,409**	**$3,426,786**	**$64,158,920**
Total Receipt Volume (Mcf)	1,721,221	1,208,700	1,987,743	2,407,232	2,237,155	1,514,476	1,995,953	1,779,732	1,601,877	1,429,410	1,589,054	1,527,436	20,999,989
Less: Total Shrinkage (Mcf)	30,366	23,085	39,548	56,082	45,491	30,686	41,300	38,657	34,788	2,938	4,195	4,059	351,196
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	**1,690,855**	**1,185,615**	**1,948,194**	**2,351,150**	**2,191,664**	**1,483,789**	**1,954,653**	**1,741,075**	**1,567,089**	**1,426,472**	**1,584,859**	**1,523,377**	**20,648,792**
										Unit Storage Commodity Gas Cost ($/Mcf) -			**$3.1072**

Notes:
1). Based on the PGC 2025 August Compliance Filing
2). Using 1.049 Mcf/Dth conversion factor
3. Storage rates are derived at Delivered Volume to NFGDC with 9 months of actuals & 3 months of projections

NFG Distribution Corporation
Inventory Cost Record as Booked
September 30, 2025
F:\Accounting\SOX Secured Files\Monthly Entries NFGDC\Monthly\STORAGE\Stor25\[Stor0925.xls]calc mcf

W/S B
Product 1902

APPROVED
By Shannon N Bolender at 11:36 am, Oct 10, 2025

	Current Month MCF	Rate	Amount	Since October 1st MCF	Rate *	Amount
UPDATE LINKS						
Balance Beginning of Period						
New York	A 16,825,026	1.7162	A $28,874,530.71	19,970,797	$1.2118	$24,200,576.02
Pennsylvania	6,815,766	0.4617	$3,147,030.41	8,155,231	$1.3200	$10,764,567.87
	23,640,792	1.3545	$32,021,561.12	28,126,028	1.2432	$34,965,143.89
Input - New York	2,816,543	(1.8514)	($5,214,459.63)	16,677,037	1.7118	$28,547,317.40
- Pennsylvania	1,150,114	5.8191	$6,692,597.98	6,811,644	C 5.7093	$38,889,719.09
Output - New York	3,080	B 1.9624	$6,044.19	17,009,345	1.7105	$29,093,866.53
- Pennsylvania	7,760	3.3306	$25,845.15	7,008,755	C 5.6844	$39,840,503.72
Net - New York	2,813,463	(1.8555)	($5,220,503.82)	(332,308)	1.6447	($546,549.13)
Net - Pennsylvania	1,142,354	5.8360	$6,666,752.83	(197,111)	4.8236	($950,784.63)
	3,955,817	0.3656	$1,446,249.01	(529,419)	2.8283	($1,497,333.76)
Loss	0	0.0000	0.00	0	0.0000	0.00
Balance End of Period to W/S C						
New York	D 19,638,489	$1.2045	$23,654,026.89	19,638,489	$1.2045	$23,654,026.89
Pennsylvania	7,958,120	$1.2332	$9,813,783.24	7,958,120	$1.2332	$9,813,783.24
TOTAL	27,596,609	$1.2128	$33,467,810.13	27,596,609	$1.2128	$33,467,810.13
* Rate per Valuation Department	19,638,489	0			-	OK
	7,958,120	0			-	OK

Michael Maggioli:
Updated 11/24

A	UPDATE LINKS		Note: Links neede
	13,860,494	A 33,761,777	Do not use links for
	5,661,530	32,197,121	
	17,006,265	29,087,822	
	7,000,995	39,814,659	
NY	(3,145,771)	4,673,954.69	
PA	(1,339,465)	(7,617,537.46)	

Michael Maggioli:
10/31/24- Updated with 9/30/24 balances

UPDATE FIRST MONTH OF FISCAL YEAR

Gas Stored Underground YTD (9/30/2024)

New York	19,970,797	$	1.211798	$24,200,576.02
Pennsylvania	8,155,231	$	1.319959	10,764,567.87
	28,126,028	$	1.243160	$34,965,143.89

Gas Stored Underground Current

New York	19,638,489	$	1.2045	$23,654,026.89
Pennsylvania	7,958,120	$	1.2332	$9,813,783.24
	27,596,609		$1.2128	$33,467,810.13

Balance Sheet Presentation
Gas Stored Underground Current (LIFO)

New York	19,638,489		$1.2045	$23,654,026.89
Pennsylvania	7,958,120		$1.2332	$9,813,783.24
Add: Reserve For Gas Replacement				
New York				($0.00)
Pennsylvania				$0.00
				$0.00
Gas Stored Underground Current	27,596,609		$1.2128	$33,467,810.13

($0.00) (Positive amount recorded to Account 253551 - Negative amount recorded to 591800)
$0.00 (Positive amount recorded to Account 253552 - Negative amount recorded to 591800)
Agrees to B/S a/c # 164100

New York	19,638,489	$1.2045	$23,654,026.89	- OK
Pennsylvania	7,958,120	$1.2332	$9,813,783.24	- OK
	27,596,609	$1.2128	$33,467,810.13	

Ties to layer rate table (next page)

Michael Maggioli:
Updated 11/24

Purchased Gas Sold	Mcf	Monthly	Dollars	Mcf	YTD	Dollars
Injections						
New York	2,816,543		($5,214,459.63)	16,677,037		$28,547,317.40
Pennsylvania	1,150,114		$6,692,597.98	6,811,644		$38,889,719.09
	3,966,657		$1,478,138.35	23,488,681		$67,437,036.49
Withdrawals						
New York	3,080		$6,044.19	17,009,345		$29,093,866.53
Pennsylvania	7,760		$25,845.15	7,008,755		$39,840,503.72
	10,840		$31,889.34	24,018,100		$68,934,370.25

A	UPDATE LINKS		Note: Links neede
		Prior Month YTD	Do not use links for
	13,860,494	A $33,761,777.03	
	5,661,530	$32,197,121.11	
	19,522,024	$ 65,958,898.14	
	17,006,265	$29,087,822.34	
	7,000,995	$39,814,658.57	
	24,007,260	$ 68,902,480.91	

A = Agrees to prior month ending balance
B = Agrees to calculated NY storage rate
C = Agrees to calculated PA storage rate
D = Agrees to estimated ending storage inventory balance

NFG Distribution Corporation
Storage Gas Inventory Priced at Layer Rates
9/30/2025

W/S C
PRODUCT# 1902

**Please Note: First month following fiscal YE (Oct) when adding PY layer ensure that columns R-W are updated (copy & paste values) w/ PY ending balances (Sep 30 current month amounts at layer rates (X-AA). Also please note that formulas need to be reviewed & updated in rows V45-Z71 to ensure correct prior month reserve balance is referenced. The cell reference will shift due to added layer rate insert in Oct.

**Please Note: First month following fiscal YE (Oct)- Make sure to update the formulas of new years layer rate row for X,Y,Z,AA columns.

Layer Year	MCF 9/30/24 NY	MCF 9/30/24 PA	Layer Rate NY	Layer Rate PA	Amount 9/30/24 NY	Amount 9/30/24 PA	CURRENT MONTH MCF NY	CURRENT MONTH MCF PA	CURRENT MONTH Amount at Layer Rates NY	CURRENT MONTH Amount at Layer Rates PA
2025							-	-	-	-
2024	702,252	288,514	1.6447065	4.823600061	$ 1,154,998.42	$ 1,391,676.15	369,944	91,403	608,449.30	440,891.52
2023	92,382	-	1.6286354	0	$ 150,456.59	$ -	92,382	-	150,456.59	-
2022	-	-	0	0	$ -	$ -	-	-	0.00	-
2021	-	-	0	0	$ -	$ -	-	-	0.00	0.00
2020	551,946	497,240	1.4783043	3.7243000	$ 815,944.14	$ 1,851,870.93	551,946	497,240	815,944.14	1,851,870.93
2019	845,192	29,807	2.1754511	4.6127003	$ 1,838,673.90	$ 137,490.76	845,192	29,807	1,838,673.90	137,490.76
2018	455,033	-	2.5472239	0	$ 1,159,070.95	$ -	455,033	0	1,159,070.95	0.00
2017	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2016	-	150,371	0	3.8719000	$ -	$ 582,221.47	0	150,371	0.00	582,221.47
2015	-	153,235	1.5312976	4.1997000	$ -	$ 643,541.03	0	153,235	0.00	643,541.03
2014	-	122,940	0	6.0065144	$ -	$ 738,440.88	0	122,940	0.00	738,440.88
2013	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2012	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2011	517,091	-	4.9097543	0	$ 2,538,789.77	$ -	517,091	0	2,538,789.77	0.00
2010	500,421	-	5.2178791	0	$ 2,611,136.27	$ -	500,421	0	2,611,136.27	0.00
2007	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2003	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2002	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2001	-	-	0	0	$ -	$ -	0	0	0.00	0.00
2000	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1999	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1997	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1996	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1995	-	-	0	0	$ -	$ -	0	0	0.00	0.00
1994	391,383	-	3.7185166	3.7185166	$ 1,455,365.19	$ -	391,383	0	1,455,365.19	0.00
1993	15,915,097	6,913,124	0.7839186	0.7839186	$ 12,476,140.78	$ 5,419,326.65	15,915,097	6,913,124	12,476,140.78	5,419,327
	19,970,797	8,155,231	$ 1.21180	$ 1.31996	24,200,576.02	10,764,567.87	19,638,489	7,958,120	$ 23,654,026.89	$ 9,813,783.24
							Per W/S B	Per W/S B	Per W/S B	Per W/S B

*Note no new layer for FY25 given we have net decrements in NY & PA

Layers agree to 9/30/2024 file

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references- only if adding new row across the entire spreadsheet. FY 25 only added row within columns of table above so did not shift cell

Computation of Reserve for Gas Replacement

1.204472834

		NY	PA	TOTAL	
Inventory at FIFO Basis		23,654,026.89	9,813,783.24	33,467,810.13	per W/S B
Inventory at Layer Rates		23,654,026.89	9,813,783.24	33,467,810.13	
Required Reserve	Sep 30, 2025	$0.00	$0.00	$0.00	
Required Reserve as of	Sep 30, 2025	$0.00	$0.00	$0.00	
Required Reserve as of	Aug 31, 2025	$0.00	$2,195,975.49	$2,195,975.49	UPDATE LINK
Adjustment for Current Month		$0.00	($2,195,975.49)	($2,195,975.49)	

NY & PA: WA Pricing = LIFO for YE as the LIFO reserve is reversed

Michael Maggioli: Oct: Make sure to update cell ref from shift due to layer rate add in above table.

Accounting Entry:

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell references.

1774-164101	Gas Storage	$0.00
4776-164102	Gas Storage	(2,195,975.49)
1774-253551	Reserve for Gas Replacement	0.00
4776-253552	Reserve for Gas Replacement	2,195,975.49

Accounting Entry (NY Only):

Michael Maggioli: Make sure to update cell links in Oct given new added layer rate will shift cell

			Dr. / (Cr.)	
1774-164101	Gas Storage		$ (0.00)	
1774-591800	Gas Injected into Storage (pge)		0.00	
Booked prior month		8/31/25	$ (12,242,899.17)	UPDATE
NY Current Month Entry			12,242,899.17	LINK
-to adjust NY inventory balance for impact of negative reserve for gas replacement.				

Accounting Entry (PA Only):

			Dr. / (Cr.)	
1774-164101	Gas Storage		$ -	
1774-591800	Gas Injected into Storage (pge)		-	
Booked prior month		8/31/25	$ -	UPDATE
PA Current Month Entry			-	LINK
-to adjust PA inventory balance for impact of negative reserve for gas replacement.				

Michael Maggioli: This was adjusted during Oct ME to reflect that we did

NY Rate - September 2025

$5,527,184/2,816,541 MCF = $1.96/mcf - NY RATE

Calculation of FYTD RATE to Produce the Monthly Storage Journal Entry for NFGDC-NY

		MCF - Month	$$ - Month	COMMODITY Rate - Month	MCF - FYTD	$$ - FYTD	Rate - FYTD	
								1
October-24	INJ	1,625,125	2,878,909	$ 1.77150	1,625,125	2,878,909	$ 1.77150	2
	W/D	(210,332)	(372,603)	$ 1.77150	(210,332)	(372,603)	$ 1.77150	3
	NET	1,414,793	2,506,306	$ 1.77150	1,414,793	2,506,306	$ 1.77150	4
November-24	INJ	375,892	623,259	$ 1.65808	2,001,017	3,502,168	$ 1.75019	5
	W/D	(1,346,381)	(2,232,409)	$ 1.65808	(1,556,713)	(2,605,012)	$ 1.67341	6
	NET	(970,489)	(1,609,149)	$ 1.65808	444,304	897,156	$ 2.01924	7
December-24	INJ	35,005	58,041	$ 1.65808	2,036,022	3,560,209	$ 1.74861	8
	W/D	(3,141,052)	(5,208,119)	$ 1.65808	(4,697,765)	(7,813,131)	$ 1.66316	9
	NET	(3,106,047)	(5,150,078)	$ 1.65808	(2,661,743)	(4,252,922)	$ 1.59780	10
January-25	INJ	11,962	19,834	$ 1.65808	2,047,984	3,580,043	$ 1.74808	11
	W/D	(4,473,445)	(7,417,335)	$ 1.65808	(9,171,210)	(15,230,466)	$ 1.66068	12
	NET	(4,461,483)	(7,397,501)	$ 1.65808	(7,123,226)	(11,650,422)	$ 1.63555	13
February-25	INJ	165,131	273,801	$ 1.65808	2,213,115	3,853,844	$ 1.74137	14
	W/D	(4,310,008)	(7,146,343)	$ 1.65808	(13,481,218)	(22,376,809)	$ 1.65985	15
	NET	(4,144,877)	(6,872,542)	$ 1.65808	(11,268,103)	(18,522,965)	$ 1.64384	16
March-25	INJ	103,589	171,759	$ 1.65808	2,316,704	4,025,603	$ 1.73764	17
	W/D	(3,013,907)	(4,997,302)	$ 1.65808	(16,495,125)	(27,374,111)	$ 1.65953	18
	NET	(2,910,318)	(4,825,543)	$ 1.65808	(14,178,421)	(23,348,508)	$ 1.64676	19
April-25	INJ	1,233,651	4,034,039	$ 3.27000	3,550,355	8,059,642	$ 2.27009	20
	W/D	(567,312)	(1,855,110)	$ 3.27000	(17,062,437)	(29,229,221)	$ 1.71307	21
	NET	666,339	2,178,929	3.27	(13,512,082)	(21,169,579)	$ 1.56671	22
May-25	INJ	1,978,407	4,950,964	$ 2.50250	5,528,762	13,010,605	$ 2.35326	23
	W/D	74,572	186,616	$ 2.50250	(16,987,865)	(29,042,605)	$ 1.70961	24
	NET	2,052,979	5,137,580	$ 2.50250	(11,459,103)	(16,031,999)	$ 1.39906	25
June-25	INJ	2,956,204	6,926,977	$ 2.34320	8,484,966	19,937,583	$ 2.34975	26
	W/D	(4,948)	(11,594)	$ 2.34320	(16,992,813)	(29,054,199)	$ 1.70979	27
	NET	2,951,256	6,915,383	$ 2.34320	(8,507,847)	(9,116,616)	$ 1.07155	28
July-25	INJ	2,516,898	6,683,623	$ 2.65550	11,001,864	26,621,205	$ 2.41970	29
	W/D	(138)	(366)	$ 2.65550	(16,992,951)	(29,054,565)	$ 1.70980	30
	NET	2,516,760	6,683,256	$ 2.65550	(5,991,087)	(2,433,360)	$ 0.40616	31
August-25	INJ	2,858,630	7,140,572	$ 2.49790	13,860,494	33,761,777	$ 2.43583	32
	W/D	(13,314)	(33,257)	$ 2.49790	(17,006,265)	(29,087,822)	$ 1.71042	33
	NET	2,845,316	7,107,315	$ 2.49790	(3,145,771)	4,673,955	$ (1.48579)	34
September-25	INJ	2,816,543	5,527,184	$ 1.96240	16,677,037	28,547,317.40	$ 1.71177	35
	W/D	(3,080)	(6,044)	$ 1.96240	(17,009,345)	(29,093,867)	$ 1.71046	36
	NET	2,813,463	5,521,140	$ 1.96240	(332,308)	(546,549.13)	$ 1.64471	37
						$ (29,640,415.66192)		

Michael Maggioli:
Begg. In Nov and through April- Reminder to update formula to pull Weighted Avg Rate (7 columns) instead of Commodity Rate (3 columns).

Michael Maggioli:

Begg. In May and through October- Reminder to update formula to pull Commodity Rate (3 columns) instead of Weighted avg. Rate (7 columns).

Payne:
Prepare schedule E for correct value for year end.

Maggioli: Includes YE adj to bring reserve replacement bal to 0. (Review to add if formula specific to period 12.)

$ 39,288,961.01653
$ 12,242,899.17208
$ 1,501,255.55928
28,547,317.40

To: M. Maggioli

From: C. Mann

Date: August 4, 2025

Re: PAD Storage Rates

The storage rates in effect for the 4th Quarter of FY25 are derived as follows:

	($/Mcf)	
Demand	**$2.5798**	
Commodity	**$3.1072**	Qtrly PA Storage Rates- Updated on Schedules Tab
Total	**$5.6870**	

Notes:

(1) Based on the PGC 2025 August Compliance Filing of projected values.

(2) Using 1.049 Dth/Mcf conversion factor

(3) Storage Rates are derived at Delivered Volume to NFGDC with 9 months of actuals & 3 months of projections

CC:

N. Pasquarella
M. Duszenko
L. Petko
L. Metzger
D. Koch
T. Wesoloski

National Fuel Gas Distribution Corporation
Pennsylvania Division
Unit Storage Gas Cost ($/Mcf)
For the Twelve Months Ending September 2025

Conversion Factor 1.049

	Actual Oct-24	Actual Nov-24	Actual Dec-24	Actual Jan-25	Actual Feb-25	Actual Mar-25	Actual Apr-25	Actual May-25	Actual Jun-25	Projected Jul-25	Projected Aug-25	Projected Sep-25	Total
Demand													
Upstream Purchased Gas Cost	3,094,737	3,118,166	3,140,652	3,140,931	3,123,608	3,122,428	3,162,463	3,154,802	3,059,569	3,126,520	3,136,751	3,126,680	37,507,308
Appalachian Gas Cost	0	0	0	0	0	0	0	0	0	0	0	0	0
Local Production Gas Cost	0	0	0	0	0	0	0	0	0	0	0	0	0
Storage Rental & Transportation Cost	1,225,420	1,224,494	1,223,784	1,222,950	1,221,729	1,220,886	1,359,468	1,359,334	1,283,013	1,473,627	1,473,627	1,473,627	15,761,960
Total Demand Cost	4,320,157	4,342,660	4,364,436	4,363,881	4,345,337	4,343,314	4,521,931	4,514,137	4,342,583	4,600,147	4,610,378	4,600,307	53,269,268
Less: Offsystem Sales Purchases	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Demand Cost ($)	**$4,320,157**	**$4,342,660**	**$4,364,436**	**$4,363,881**	**$4,345,337**	**$4,343,314**	**$4,521,931**	**$4,514,137**	**$4,342,583**	**$4,600,147**	**$4,610,378**	**$4,600,307**	**$53,269,268**
Total Receipt Volume (Mcf)	1,721,221	1,208,700	1,987,743	2,407,232	2,237,155	1,514,476	1,995,953	1,779,732	1,601,877	1,429,410	1,589,054	1,527,436	20,999,989
Less: Total Shrinkage (Mcf)	30,366	23,085	39,548	56,082	45,491	30,686	41,300	38,657	34,788	2,938	4,195	4,059	351,196
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	**1,690,855**	**1,185,615**	**1,948,194**	**2,351,150**	**2,191,664**	**1,483,789**	**1,954,653**	**1,741,075**	**1,567,089**	**1,426,472**	**1,584,859**	**1,523,377**	**20,648,792**
										Unit Storage Demand Gas Cost ($/Mcf) -			**$2.5798**
Commodity													
Upstream Purchased Gas Cost	3,073,152	2,700,516	6,110,405	10,732,567	9,337,142	5,409,159	6,304,443	4,655,056	4,065,987	3,548,051	3,860,415	3,379,541	63,176,434
Appalachian Gas Cost	0	0	0	0	0	0	0	0	0	30,057	31,194	0	61,251
Local Production Gas Cost	23,183	32,900	45,973	42,423	32,559	52,759	54,754	42,761	37,798	0	0	0	365,110
Storage Rental & Transportation Cost	30,208	26,068	49,580	87,691	59,530	33,899	39,538	42,336	47,233	42,997	49,800	47,245	556,125
Total Commodity Cost	3,126,543	2,759,484	6,205,958	10,862,681	9,429,231	5,495,816	6,398,735	4,740,153	4,151,017	3,621,105	3,941,409	3,426,786	64,158,920
Less: Offsystem Sales Purchases	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Commodity Cost ($)	**$3,126,543**	**$2,759,484**	**$6,205,958**	**$10,862,681**	**$9,429,231**	**$5,495,816**	**$6,398,735**	**$4,740,153**	**$4,151,017**	**$3,621,105**	**$3,941,409**	**$3,426,786**	**$64,158,920**
Total Receipt Volume (Mcf)	1,721,221	1,208,700	1,987,743	2,407,232	2,237,155	1,514,476	1,995,953	1,779,732	1,601,877	1,429,410	1,589,054	1,527,436	20,999,989
Less: Total Shrinkage (Mcf)	30,366	23,085	39,548	56,082	45,491	30,686	41,300	38,657	34,788	2,938	4,195	4,059	351,196
Less: Offsystem Sales Purchases (Mcf)	0	0	0	0	0	0	0	0	0	0	0	0	0
Net Volume (Mcf)	**1,690,855**	**1,185,615**	**1,948,194**	**2,351,150**	**2,191,664**	**1,483,789**	**1,954,653**	**1,741,075**	**1,567,089**	**1,426,472**	**1,584,859**	**1,523,377**	**20,648,792**
										Unit Storage Commodity Gas Cost ($/Mcf) -			**$3.1072**

Notes:
1). Based on the PGC 2025 August Compliance Filing
2). Using 1.049 Mcf/Dth conversion factor
3. Storage rates are derived at Delivered Volume to NFGDC with 9 months of actuals & 3 months of projections

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-46:

Please provide a comparison between actual and budgeted O&M expenses by budget cost element for the historical test year and explain any budget variances of 10 percent or more.

Response:

Budget Performance
NFG Distribution Co - PA
Operating & Maintenance Expense
TME 9/30/25

	Actual	Budget	Variance	% Variance
Net Labor	$34,569,322	$34,811,966	$242,643	0.7%
Material	1,477,041	1,531,219	54,178	3.5%
Rents	1,315,632	1,337,003	21,371	1.6%
Transportation	3,874,753	3,914,157	39,404	1.0%
Utilities	923,765	1,025,749	101,984	9.9%
Outside Services	3,512,725	4,382,775	870,050	19.9%
Gas Purchases	(2,380)	(2,850)	(470)	16.5%
Equipment Purchases	967	968	1	0.1%
Employee Benefits	6,497,279	6,547,537	50,259	0.8%
Office - Employee Expenses	1,556,889	1,679,082	122,193	7.3%
Advertising - Sales	761,275	757,900	(3,375)	-0.4%
Research/Development	39,697	256,954	217,257	84.6%
Dues and Memberships	234,266	267,558	33,291	12.4%
Other Expense	2,196,801	2,455,532	258,731	10.5%
Revenue Income	(421,718)	(351,333)	70,385	-20.0%
Uncollectibles	4,619,000	3,919,000	(700,000)	-17.9%
Regulatory Assessment	954,163	896,936	(57,227)	-6.4%
Other Insurance	1,021,080	1,003,904	(17,176)	-1.7%
Injuries & Damages	128,826	251,000	122,174	48.7%
UNICAP	(1,291,538)	(1,292,854)	(1,316)	0.1%
Postage	40,067	48,604	8,537	17.6%
Information Services	5,906,584	6,662,364	755,781	11.3%
Clearing Budget Item	1,275,192	1,342,268	67,076	5.0%
Messenger Expense	89,985	134,000	44,015	32.8%
Environmental	52,546	41,166	(11,380)	-27.6%
Accounting Adj & Accr	1,674,317	1,917,466	243,149	12.7%
Totals	**$71,006,536**	**$73,538,072**	**$2,531,535**	3.4%

Cost elements with variances in excess of 10% for the TME 9/30/25 are described below:

- Outside Services - Third-party savings primarily due to lower restoration, mowing and cross bore expenses, coupled with savings related to CAP work being brought in-house and lower collection agency fees.

- Gas Purchases – Minor variance due to increased gas quality and meter maintenance for producers.

- Research/Development – Lower spending due to delays in demonstration project implementation.

- Dues and Memberships - Lower dues coupled with prior year accounting corrections.

- Other Expense – Favorable collections for line hits.

- Revenue Income - Volume of reconnections in excess of budget.

- Uncollectibles - Increased expense to ensure adequate reserve exists in allowance for doubtful accounts.

- Injuries & Damages – Lower claims (both employee and third-party).

- Postage - Lower postage expense due to lower volumes of material to be mailed.

- Information Services – Lower labor due to vacant positions coupled with lower contractor utilization and savings on software expenses.

- Messenger Expense – Lower costs for messenger expenses.

- Environmental – Higher than expected costs for transport and disposal of waste.

- Accounting Adj & Accr - Lower MFC Uncollectibles due to lower gas costs in actuals than base plan.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-47:

Please provide the most recent actual number of eligible participants in each of the employee medical and dental plans reflected in the Company's filing.

Response:

As of 9/2025:

Eligible Employees:
- Health Insurance: 436 employees
- Pharmacy Prescription Drug Benefits administered by CVS Caremark: 226
- Dental: 433

Participating employees:
- Health Insurance: 373 employees
- Pharmacy Prescription Drug Benefits administered by CVS Caremark: 205
- Dental: 357

Note: With the exception of 3 Part-Time Non-Union Employees, all employees have the option to elect prescription coverage through either their Health Insurance Plan or the Pharmacy Prescription Drug Benefits administered by CVS Caremark. Eligibility depends on their employee type/union classification.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-48:

Please provide workpapers showing the derivation of future test year Social Security and Medicare FICA taxes based on future test year labor expense. Identify both the total and O&M amounts.

Response:

See RR-48, page 2 attached

RR - 48 Response

Submission

TAX RATE SCHEDULE	Rate	Maximum Compensation 2025	Maximum Compensation 2026
Social Security Tax:	6.20%	176,100	184,500
Medicare tax	1.45%	No Max	
Total	7.65%		

Classification	Gross Sep. 2026 Normalized	Employee Count	Estimated Social Security	Estimated Medicare	TOTAL FICA
Non-Supervisory Wages:					
Clerical	$6,167,996	109	$382,415.74	$89,435.94	$471,851.67
Bargaining Group (Local 22)	87,623	1	5,432.62	1,270.53	6,703.16
Bargaining Group (Local 2154 PA)	280,995	3	17,421.69	4,074.43	21,496.11
Bargaining Group (Local 2154 PA Supp)	8,231,746	107	510,368.24	119,360.31	629,728.55
Bargaining Group (Local 22 Supp)	7,157,597	101	443,771.02	103,785.16	547,556.18
		212			
Overtime - Total for All Nonsalaried Employees	1,433,755		88,892.82	20,789.45	109,682.27
			0.00	0.00	0.00
Supervisory	14,809,473	123	918,187.33	214,737.36	1,132,924.69
			0.00	0.00	0.00
				0.00	0.00
Total	**$38,169,185**	**444**	**$2,366,489.46**	**$553,453.18**	**$2,919,942.64**
O&M			**$1,730,850.39**	**$404,795.66**	**$2,135,646.04**

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-49:

Please provide workpapers showing the derivation of future test year federal and state unemployment taxes. Show both the total and O&M amounts.

Response:

Please refer to National Fuel Exhibit A (FTY) and National Fuel Exhibit A (FPFTY) Schedules D-9 and D-10.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-50:

Please provide workpapers showing the derivation of future test year capital stock taxes.

Response:

Not applicable. The Pennsylvania Capital Stock tax was eliminated for tax years beginning January 1, 2016.

National Fuel Gas Distribution Corporation PA Division

Standard Data Request

Revenue Requirement

Question No. RR-51:

If applicable, please provide a copy of the billing and payment terms for all contracts between the Company and its parent or an affiliated company for services. Further, to the extent that the parent or affiliated company provides service to non-affiliated companies, please provide the corresponding billing and payment terms.

Response:

The billing and payment terms for all contracts between the Company and its parent or affiliated companies for services are set forth in Article V – Billing Practices of the Service Agreement included in the Company's response to Section 53.53 – III-I.5 in this proceeding.

National Fuel Gas Distribution Corporation PA Division
Standard Data Request
Revenue Requirement

Question No. RR-52:

Please provide the annual level of outside services employed for the preceding three calendar years. Include in your response a breakdown of the test year amount indicating the service provider and the type of service performed.

Response:

See page 2 for outside service expenses for the National Fuel Gas Distribution Corporation Pennsylvania Division for the tweleve months ending September 30, 2022, 2023, 2024, and 2025

Response:

Account 923 - Outside Service Expenses (National Fuel Gas Distribution Corporation (Pennsylvania Division)) for the twelve months ending September 30:

Service Provider	Type of Service	2022	2023	2024	2025
3E Company Environmental, Ecological And Engineering, LLC	Other	$ -	$ 433	$ 442	$ 4,674
Associated Pipeline Contractors Inc. *	Legal Expenses	-	(31,250)	-	-
Babst, Calland, Clements, Zomnir P.C.	Legal Expenses	250	-	-	-
Beckage PLLC	Legal Expenses	216	-	-	-
Black & Veatch Mgmt Consulting, LLC	Professional Services	5,749	299	15,430	3,326
Bloomberg Industry Group	Professional Services	-	-	-	2,904
Bonadio & Co, LLP	Professional Services	6,364	7,477	7,379	9,402
Bradford Publishing	Office Expenses	-	851	-	872
Buchanan Ingersoll & Rooney P.C.	Legal Expenses	30,300	15,377	6,497	124
Butler Eagle	Office Expenses	-	-	336	-
Chidos Dry Cleaners	Professional Services	-	-	-	27
Cohen & Company LTD	Professional Services	-	-	7,878	12,778
Common Expense **	Shared Services	35,370	44,414	32,777	27,825
Cority Software (USA) Inc.	Software & Maintenance	-	-	-	52,171
Courier Express	Office Expenses	-	999	2,510	3,517
Cullen And Dykman LLP	Legal Expenses	18,000	-	-	-
Dumais Consulting LLC	Professional Services	-	904	895	-
Educational Enterprises Inc.	Professional Services	-	-	-	100
ERM Consulting & Engineering Inc.	Professional Services	30,128	-	-	-
Explore Your Town Inc.	Office Expenses	-	-	299	-
FCF Career Development	Professional Services	-	-	-	150
Financial Accounting Standards	Professional Services	285	450	333	217
Freed Maxick PC	Professional Services	-	-	-	3,800
Gannett Fleming Valuation & Rate	Professional Services	3,088	2,835	3,295	3,565
Gannett New York	Professional Services	-	-	-	8,625
Hawke Mckeon & Sniscak LLP	Legal Expenses	-	-	-	8,625
JNR Adjustment Company Inc.	Professional Services	1,494	-	-	-
Karen Camiolo	Professional Services	-	67,620	-	-
Knox Mclaughlin Gornall & Sennett P.C.	Legal Expenses	-	-	-	10,430
Lippes Mathias LLP	Legal Expenses	-	-	-	122
M & T Bank	Professional Services	225	1,608	4,275	9,971
Macdonald, Illig, Jones & Britton LLP	Legal Expenses	27,058	18,999	14,556	20,843
Marnen Mioduszewski Bordonaro	Legal Expenses	11,748	13,501	-	-
Mercer (US) LLC	Professional Services	35,534	41,639	47,688	37,814
MES Solutions	Other	2,395	-	-	-
Mizner Law Firm	Professional Services	44,870	5,934	425	7,620
MMI Intellectual Property	Legal Expenses	1,035	-	-	-
Mower	Advertising	2,722	-	-	-
Navex Global Inc.	Professional Services	-	2,228	-	2,516
North American Energy Standards Board	Professional Services	-	4,800	2,400	2,400
PA Chamber Of Business And Industry	Legal Expenses	-	1,000	-	-
Penn State Behrend	Professional Services	-	-	355	-
Penn State University	Professional Services	-	-	-	1,000
Peoplesoft USA, Inc.	Software & Maintenance	97,673	116,033	104,743	109,301
Phillips Lytle LLP	Legal Expenses	65,553	32,630	1,964	2,209
Post & Schell P.C.	Professional Services	200,757	141,900	69,592	107,306
Pricewaterhouse Coopers LLP	Professional Services	141,841	152,157	213,381	190,439
Professional Communications	Professional Services	442	442	442	442
Public Company Accounting Oversight Board	Professional Services	1,868	3,000	2,575	2,292
Reger Rizzo & Darnall LLP	Professional Services	-	-	-	19,000
Sharon Herald Company Inc.	Office Expenses	-	5,132	-	-
Southwest Directional Drilling LLC *	Legal Expenses	(54,260)	-	-	-
Szymkowiak & Associates CPAs PP.C.	Professional Services	4,467	10,908	1,774	-
The Daily Press	Office Expenses	-	768	2,439	364
The Kane Republican	Office Expenses	-	334	1,995	641
The Record-Argus	Professional Services	-	678	-	308
The Ridgway Record Shop Right	Office Expenses	-	699	2,211	331
Times Observer	Office Expenses	-	-	1,172	-
Towers Watson Delaware Inc.	Professional Services	3,284	3,599	2,773	972
Towers Watson Investment Service Inc.	Professional Services	-	-	-	2,951
UPS Inc.	Other	27	-	-	-
Venango Newspapers Inc.	Office Expenses	-	585	-	-
Western Pennsylvania Newspaper Company	Office Expenses	-	-	290	-
Willis Towers Watson	Professional Services	-	-	951	-
Workiva, Inc.	Software & Maintenance	6,672	6,672	9,172	9,530
Total Outside Services Expenses		$ 725,155	$ 675,653	$ 563,243	$ 681,500

* Negative amount reflects a vendor credit issued during the test year related to the resolution of a prior contractual matter.

** This amount represents costs aggregated at the National Fuel Gas Distribution Corporation level and allocated to the PA Division based on established allocation methodologies. Detailed vendor-level information is not available because these expenses are recorded in consolidated accounts.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-53:

Please describe each budgeted or planned cost savings program to be implemented during the historic or future year. Please identify the cost of implementing the program and the anticipated annual savings.

Response:

There are currently no such programs that are planned to be implemented in this period of time.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-54:

Please explain how the Company has treated reserve accruals and balances for ratemaking purposes and provide the requested level of any self-funded reserve accruals by type of item.

Response:

The Company has not made any ratemaking adjustments based on self-funded reserve accruals.

National Fuel Gas Distribution Corporation
PA Division

Standard Data Request

Revenue Requirement

Question No. RR-55:

Please provide a copy of the corporate federal tax returns and supporting schedules for the preceding three years and, if applicable, a copy of the calculation workpapers for the Company's consolidated tax savings adjustment.

Response:

The Company is included as part of a consolidated federal income tax return. Since the complete federal tax return is a voluminous document, only CONFIDENTIAL excerpts from the preceding three years' returns are provided. These excerpts include Federal Form 1120 (Pages 1-6), consolidating income statement and balance sheet supporting schedules. Please see CONFIDENTIAL Exhibit SDR-RR-55 for these excerpts. The complete CONFIDENTIAL tax returns will be made available to appropriate parties upon request.

There are no consolidated tax savings adjustments applicable to the Company due to being in a taxable loss each year for fiscal years 2023 through 2025.

NATIONAL FUEL EXHIBIT A

FPFTY

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission

Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)
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B-3	Statement of Operating Revenues	D. N. Koch
B-4	Operation and Maintenance Expenses	D. N. Koch
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	SECTION C	
C-1	Rate Base	M. M. Duszenko
C-2	Pro Forma Gas Plant in Service	M. M. Duszenko
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C-3	Accumulated Provision for Depreciation	M. M. Duszenko
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	Accumulated Depreciation by FERC Account	M. M. Duszenko
	Cost of Removal	J. Spanos
	Negative Net Salvage Amortization	J. Spanos
	Salvage	J. Spanos
C-4	Working Capital	M. M. Duszenko
	Summary of Working Capital	M. M. Duszenko
	Summary of Expense Lag Calculations	M. M. Duszenko
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	Tax Payment Lag Calculations	M. M. Duszenko
	Prepaid Expenses	M. M. Duszenko
C-5	Gas Inventory	M. M. Duszenko
C-6	Accumulated Deferred Income Taxes	E. Forcucci
C-7	Customer Deposits	M. M. Duszenko
C-8	Materials & Supplies	M. M. Duszenko

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission

Fully Projected Future Test Period - 12 Months Ended October 31, 2027

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Schedule	Description	Witness:
	SECTION D	
D-1	Summary of Revenue and Expenses Pro Forma with Proposed Revenue Increase	D. N. Koch
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D-3	Summary of Pro Forma Adjustments	D. N. Koch
D-4	SCHEDULE NOT USED	N/A
D-5	Adjustment - Revenue Summary	C. T. Mann
D-6	Adjustment - Rate Case Expense	A. Formato
D-7	Adjustment - Uncollectibles	A. Formato
D-8	Adjustment - Depreciation expense	J. Spanos
D-9	Adjustment - Taxes Other Than Income Taxes	D. N. Koch
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D-11	Income Tax Calculation	E. Forcucci
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D-14	Regulatory Amortizations	D. N. Koch

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Summary of Rate Base and Revenue Increase

Line #	Description	[1] Function	[2] Reference Section	[3] Pro Forma Test Year Ended October 31, 2027 At Present Rates	[4] Increase	[5] Proposed Rates
RATE BASE						
1	Utility Plant		C-2	$ 957,237		$ 957,237
2	Accumulated Depreciation		C-3	(320,571)		(320,571)
3	Net Plant in service	L 1 + L 2		636,667	-	636,667
4	Working Capital		C-4	6,755		6,755
5	Gas Inventory		C-5	5,664		5,664
6	Accumulated Deferred Income Taxes		C-6	(73,925)		(73,925)
7	Customer Deposits		C-7	(5,166)		(5,166)
8	Materials & Supplies		C-8	1,587		1,587
9	TOTAL RATE BASE	Sum L 3 to L 8		$ 571,582	$ -	$ 571,582
OPERATING REVENUES AND EXPENSES						
	Operating Revenues					
10	Base Customer Charges		D-1 & D-5	$ 139,680	$ 19,680	$ 159,360
11	Gas Cost Revenue		D-5	124,571		124,571
12	Other Operating Revenues		D-5	1,273		1,273
13	Total Revenues	Sum L 10 to L 12		265,524	19,680	285,204
14	Operating Expenses		D-1	(231,839)	(305)	(232,144)
15	OIBIT	L 13 + L 14		33,685	19,375	53,060
16	Pro Forma Income Tax at Present Rates		D-11	2,340		
17	Pro Forma Income Tax on Revenue Increase		D-11		(5,215)	(2,875)
18	NET OPERATING INCOME	Sum L 15 to L 17		$ 36,025	$ 14,160	$ 50,185
19	RATE OF RETURN	L 18 / L 9		6.30%		8.78%
20	RETURN ON EQUITY		B-7	6.87%		11.25%
REVENUE INCREASE REQUIRED						
21	Rate of Return at Present Rates	L 19, Col 3		6.30%		
22	Rate of Return Required		B-7	8.78%		
23	Change in ROR	L 21 - L 20		2.48%		
24	Change in Operating Income	L 22 * L 9		$ 14,160		
25	Gross Revenue Conversion Factor		D-13	1.3899		
26	Change in Revenues	L 23 * L 24		$ 19,680		
27	Percent Increase -- Delivery Revenues	L 25 / L 10, C 3			14.09%	
28	Percent Increase -- Total Revenues	L 25 / L 13, C 3			7.41%	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

SCHEDULE NOT USED

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Statement of Net Utility Operating Income

Line No	Description	[1] FPFTY 10/31/2027	[2] Reference
	Total Operating Revenues		
1	Total Sales Revenues	$ 264,250	B-3
2	Other Operating Revenues	1,273	B-3
3	Total Revenues	265,524	
	Total Operating Expenses		
4	Operation & Maintenance Expenses	79,464	B-4 & D-2
5	Purcashed Gas Costs	124,571	D-5
6	Depreciation & Amortization Expense	25,302	D-2
7	Taxes Other Than Income Taxes	2,489	B-5
8	Total Operating Expenses	231,826	
9	Operating Income Before Income Taxes (OIBIT)	33,698	
	Income Taxes:		
10	State	(330)	B-5
11	Federal	(2,010)	B-5
12	Total Income Taxes	(2,340)	
13	**Net Utility Operating Income**	$ 36,038	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Statement of Operating Revenues

Line No	Description	[1] FPFTY 10/31/2027
	Gas Operating Revenues	
1	Residential (480)	$ 189,133
2	Commercial/Public Authority (481)	30,271
3	Industrial (481)	1,983
4	Transportation (489)	42,862
5	Sub-Total Gas Operating Revenues	264,250
	Other Operating Revenues	
6	Forfeited Discounts (487)	1,125
7	Miscellaneous Service Revenues (488)	-
8	Rent from Gas Properties (493)	100
9	Other Revenues (495)	48
10	Sub-Total Other Operating Revenues	1,273
11	**Total Operating Revenues**	$ 265,524

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Operation and Maintenance Expenses

Line No	Description	Account No	[1] FPFTY 10/31/2027
	Gas Raw Materials		
1	Liquefied Petroleum Gas Expenses	717	$ -
2	Miscellaneous Production Expenses	735	-
3	Total Gas Raw Materials Expenses		-
	Production and Gathering - Operations		
4	Operating Supervision and Engineering	750	0
5	Production Maps and Records	751	-
6	Gas Wells Expenses	752	-
7	Field Lines Expenses	753	20
8	Gas Well Royalties	758	-
9	Other Expenses	759	(0)
10	Total Production & Gathering Operation Expenses		20
	Production and Gathering - Maintenance		
11	Maintenance of Producing Gas Wells	763	-
12	Maintenance of Field Lines	764	0
13	Maintenance of Field Measuring and Reg. Station Equip.	766	-
14	Gas Supply Operation Expenses		0
	Other Gas Supply Expense - Operations		
15	Other Gas Purchases	805.0	-
16	Purchases Gas Cost Adjustments	805.1	-
17	Gas Withdrawn from Storage-Debit	808.1	-
18	Purchased Gas Expenses	807.0	189
19	Gas Used for Other Utility Operations-Credit	812.0	(39)
20	Gas Delivered to Storage-Credit	808.2	-
21	Other Gas Supply Expenses	813.0	-
22	Gas Supply Operation Expenses		150
	Underground Storage Expense - Operation		
23	Operation Supervision and Engineering	814	-
24	Maps and Records	815	-
25	Wells Expenses	816	-
26	Lines Expenses	817	-
27	Measuring and Regulating Station Expenses	820	-
28	Purification Expenses	821	-
29	Gas Losses	823	-
30	Other Expenses	824	-
31	Total Underground Storage Expenses		-
	Underground Storage Expense - Maintenance		
32	Maintenance Supervision and Engineering	830	-
33	Maintenance of Structures and Improvements	831	-
34	Maintenance of Reservoirs and Wells	832	-
35	Maintenance of Lines	833	-
36	Maintenance of Measuring & Regulating Station Equip.	835	-
37	Total Underground Maintenance Expenses		-

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Operation and Maintenance Expenses

Line No	Description	Account No	[1] FPFTY 10/31/2027
	Transmission Expense - Operations		
38	Operating Supervision and Engineering	850	2
39	System Control and Load Dispatching	851	33
40	Communication System Expenses	852	-
41	Mains Expenses	856	662
42	Measuring and Regulating Station Expenses	857	70
43	Other Expenses	859	46
44	Total Transmission Operation Expenses		813
	Transmission Expense - Maintenance		
45	Maintenance Supervision and Engineering	861	0
46	Maintenance of Structures and Improvements	862	15
47	Maintenance of Mains	863	120
48	Maintenance of Measuring and Regulating Station Equip.	865	34
49	Maintenance of Communication Equipment	866	-
50	Maintenance of Other Equipment	867	27
51	Total Transmission Maintenance Expenses		195
	Distribution Expense - Operations		
52	Operation Supervision and Engineering	870	6,426
53	Distribution Load Dispatching	871	873
54	Compressor Station Labor and Expenses	872	32
55	Compressor Station Fuel and Power (Major Only)	873	-
56	Mains and Services Expenses	874	4,421
57	Measuring and Regulating Station Expenses-General	875	367
58	Measuring and Regulating Station Expenses-Industrial	876	118
59	Measuring and Regulating Station Expenses-City Gate	877	9
60	Meter and House Regulator Expenses	878	1,007
61	Customer Installations Expenses	879	1,132
62	Other Expenses	880	5,408
63	Rents	881	122
64	Total Distribution Operation Expenses		19,916
	Distribution Expense - Maintenance		
65	Maintenance Supervision and Engineering	885	837
66	Maintenance of Structures and Improvements	886	931
67	Maintenance of Mains	887	1,266
68	Maintenance of Compressor Station Equipment	888	0
69	Maintenance of Measuring & Reg. Station Equip.-Genl.	889	168
70	Maintenance of Measuring & Reg. Station Equip.-Indtrl.	890	109
71	Maintenance of Measuring & Reg. Station Equip.-City G	891	-
72	Maintenance of Services	892	308
73	Maintenance of Meters & House Regulators	893	484
74	Maintenance of Other Equipment	894	88
75	Construction & Maintenance	895	-
76	Total Distribution Maintenance Expenses		4,191
	Customer Accounts Expense - Operations		
77	Supervision	901	1,530
78	Meter Reading Expenses	902	1,708
79	Customer Records & Collection Expenses	903	8,813
80	Uncollectable Accounts	904	3,121
81	Miscellaneous Customer Accounts Expenses	905	808
82	Total Administrative & General		15,979

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Operation and Maintenance Expenses

Line No	Description	Account No	[1] FPFTY 10/31/2027
	Customer Service & Information Expense		
83	Supervision	907	130
84	Customer Assistance Expenses	908	2,945
85	Informational & Instructional Advertising Expenses	909	777
86	Miscellaneous Customer Service & Informational Exp.	910	740
87	Total Cust. Service & Inform. Operations Exp		4,593
88	Description		
	Sales Expense		
89	Supervision	911	-
90	Demonstrating and Selling Expenses	912	-
91	Advertising Expenses	913	4
92	Miscellaneous Sales Expenses	916	-
93	Total Operation Sales Expenses		4
	Administrative & General - Operations		
94	Administrative and General Salaries	920.0	14,923
95	Office Supplies and Expenses	921.0	3,720
96	Administrative Expenses Transferred-Credit	922.0	(1,597)
96	Outside Service Employed	923.0	757
97	Property Insurance	924.0	113
98	Injuries and Damages	925.0	2,019
99	Employee Pensions and Benefits	926.0	9,248
100	Regulatory Commission Expenses	928.0	2,104
101	General Advertising Expenses	930.1	-
102	Miscellaneous General Expenses	930.2	491
103	Rents	931.0	1,338
104	Total A & G Operation Expenses		33,115
	Administrative & General - Maintenance		
105	A&G Maintenance of General Plant	932	372
106	A&G Maintenance of General Plant	935	-
107	Total A & G Maintenance Expenses		372
108	TOTAL OPERATION & MAINTENANCE EXPENSE		$ 79,348
109	Total Gas Operation Expenses		74,590
110	Total Gas Maintenance Expense		4,758
111	TOTAL OPERATION & MAINTENANCE EXPENSE		$ 79,348

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Detail of Taxes

Line No	Description	Reference	[1] FPFTY 10/31/2027
	Taxes Other Than Income Taxes		
	Non-revenue related:		
1	Pennsylvania - PURTA	D-9	$ 113
2	Capital Stock	D-9	-
3	PA and Local Use taxes	D-9	(23)
4	Subtotal		90
	Payroll Taxes		
5	FICA	D-9	1,953
6	SUTA	D-9	99
7	FUTA	D-9	11
8	Other		-
9	Subtotal		2,062
10	Total Taxes Other Than Income Taxes		$ 2,151
	Income Taxes		
11	State		$ (330)
12	Federal		(2,010)
13	Total Income Taxes		$ (2,340)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Composite Cost of Debt

Line No	Description	[1] Amount Outstanding	[2] Effective Cost Rate	[3] Annualized Cost [1]*[2]	[4] Average Weighted Cost Rate [3]/[1]
Medium Term Notes					
1	4.75% Due 2028	$ 125,000	4.97%	$ 6,213	
2	2.95% Due 2031	50,000	3.06%	1,530	
3	5.949% Due 2033	175,000	6.12%	10,710	
4	5.50% Due 2036	125,000	5.63%	7,038	
5	5.50% Due 2037	275,000	5.63%	15,483	
6	Total Medium-Term Notes	$ 750,000		$ 40,973	5.46%
	Commited Line of Credit			880	
7	Total Long-Term Debt	$ 750,000		$ 41,852	
8	Weighted Cost of Debt				5.58%

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027

Rate of Return

Line No	Description	[1] Capitalization Ratio	[2] Embedded Cost	[3] Statement Reference	[4] Return-%
1	Long-Term Debt	43.60%	5.58%	B-6	2.4300%
2	Short-Term Debt	0.00%	0.00%	B-6	0.00%
3	Common Equity	56.40%	11.25%		6.35%
4	Total	100.00%			8.78%

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Rate Base

Line #	Description	[1] Reference Schedule	[2] # of Pages	[3] Test Year Ended October 31, 2027 At Present Rates	[4] Adjustments	[5] Proposed Rates
Rate Base						
1	Utility Plant	C-2	3	$ 957,237		$ 957,237
2	Accumulated Depreciation	C-3	6	(320,571)		(320,571)
3	Net Plant in service			636,667	-	636,667
4	Working Capital	C-4	5	6,755		6,755
5	Gas Inventory	C-5	1	5,664		5,664
6	Accumulated Deferred Income Taxes	C-6	1	(73,925)		(73,925)
7	Customer Deposits	C-7	1	(5,166)		(5,166)
8	Materials & Supplies	C-8	1	1,587		1,587
9	**Total Rate Base**			$ 571,582	$ -	$ 571,582

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Gas Plant in Service Summary

Line #	Description	[1] Reference	[2] FPFTY Additions	[3] FPFTY Retirements	[4] Net Change FPFTY 10/31/27 [2] + [3]
1	Intangible Plant	Sch C-2, Pg 2	$ -	$ -	$ -
2	Production Plant	Sch C-2, Pg 2	458	(81)	377
3	Transmission Plant	Sch C-2, Page 3	17,757	(749)	17,008
4	Distribution Plant	Sch C-2, Page 3	51,247	(3,654)	47,593
5	General Plant	Sch C-2, Page 3	9,986	(2,426)	7,560
6	Non-Depreciable Plant	Sch C-2, Page 3	87	(10)	78
7	Total Utility Plant		$ 79,534	$ (6,919)	$ 72,616

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Year End Plant Balances

Line #	Description	[1] Account Number	[2] Balance September 30, 2026	[3] FPFTY Additions	[4] FPFTY Retirements	[5] Pro Forma October 31, 2027
	INTANGIBLE PLANT					
1	Miscellaneous Intangible Plant	303	24,488	-	-	24,488
2	TOTAL INTANGIBLE		24,488	-	-	24,488
	PRODUCTION PLANT					
3	Rights of Way	325.4	55	6	(1)	60
4	Field Measuring & Regulating Station Structures	328	11	1	(0)	12
5	Other Structures	329	3	0	(0)	3
6	Field Lines	332	488	54	(10)	533
7	Field Measuring & Reg. Station Equipment	334	3,589	395	(70)	3,914
8	TOTAL PRODUCTION & GATHERING		4,146	458	(81)	4,522

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Year End Plant Balances

Line #	Description	[1] Account Number	[2] Balance September 30, 2026	[3] FPFTY Additions	[4] FPFTY Retirements	[5] Pro Forma October 31, 2027
TRANSMISSION PLANT						
9	Rights of Way	365.2	2,842	543	(23)	3,363
10	Structures & Improvements	366	256	52	(2)	306
11	Mains	367	77,381	15,438	(651)	92,168
12	Measuring & Regulating Station Equipment	369	8,763	1,725	(73)	10,415
13	TOTAL TRANSMISSION		89,243	17,757	(749)	106,251
DISTRIBUTION PLANT						
14	Land & Land Rights	374	16,023	1,150	(82)	17,091
15	Structures & Improvements	375	13,035	944	(67)	13,912
16	Mains	376	402,850	28,872	(2,059)	429,663
17	Measuring & Regulating Station Equipment	378	11,068	801	(57)	11,812
18	Services	380	230,084	16,725	(1,192)	245,617
19	Meters	381	17,737	1,114	(79)	18,771
20	Meter Installations	382	3,531	257	(18)	3,769
21	House Regulatory Installations	384	1,229	87	(6)	1,311
22	Industrial Measuring & Reg. Station Equipment	385	18,802	1,298	(93)	20,008
23	TOTAL DISTRIBUTION		714,361	51,247	(3,654)	761,953.472
GENERAL PLANT						
24	Structures & Improvements	390	1,428	25	(9)	1,444
25	Office Furniture & Equipment	391	8,314	1,675	-	9,989
26	Transportation Equipment	392	15,360	3,081	(1,170)	17,271
27	Tools & Garage Equipment	394	10,297	1,937	(66)	12,168
28	Power Operated Equipment	396	11,426	2,291	(871)	12,847
29	Communication Equipment	397	4,335	977	(309)	5,002
30	TOTAL GENERAL		51,161	9,986	(2,426)	58,721
NONDEPRECIABLE PLANT						
31	Intangible Plant		124	-	-	124
32	Production Plant		3	-	-	3
33	Transmission Plant		20	4	(0)	24
34	Distribution Plant		1,017	72	(5)	1,083
35	General Plant		60	12	(5)	67
						-
36	TOTAL NONDEPRECIABLE PLANT		1,223	87	(10)	$ 1,301
37	Total Plant		$ 884,622	$ 79,534	$ (6,919)	$ 957,237

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF OCTOBER 31, 2027

		DEPRECIABLE GROUP	ORIGINAL COST AS OF OCTOBER 31, 2027	BOOK DEPRECIATION RESERVE
DEPRECIABLE PLANT				
	303	MISCELLANEOUS INTANGIBLE PLANT	24,487,946.38	22,980,541
PRODUCTION PLANT				
	325.4	RIGHTS OF WAY	60,320.48	35,207
	328	MEASURING AND REGULATING STATION STRUCTURES	12,094.97	9,624
	329	OTHER STRUCTURES	3,168.30	1,425
	332	FIELD LINES	532,547.44	174,997
	334	MEASURING AND REGULATING STATION EQUIPMENT	3,914,290.66	1,776,611
TOTAL PRODUCTION PLANT			**4,522,421.85**	**1,997,864.00**
TRANSMISSION PLANT				
	365.2	RIGHTS OF WAY	3,362,805.19	698,575
	366.2	MEASURING AND REGULATING STATION STRUCTURES	298,917.97	121,248
	366.3	OTHER STRUCTURES	6,782.92	3,565
	367.1	MAINS - EXCLUDING CATHODIC PROTECTION	85,799,712.21	20,884,359
	367.2	MAINS - CATHODIC PROTECTION	6,367,938.03	2,404,973
	369	MEASURING AND REGULATING STATION EQUIPMENT		
		1980 AND PRIOR	215,720.24	215,720
		1981 AND SUBSEQUENT	10,199,251.32	4,226,097
		TOTAL ACCOUNT 369	10,414,971.56	4,441,817.00
TOTAL TRANSMISSION PLANT			**106,251,128**	**28,554,537**
DISTRIBUTION PLANT				
	374.2	RIGHTS OF WAY	17,090,714.08	3,404,730
	375.3	STRUCTURES AND IMPROVEMENTS - LARGE	11,458,349.86	6,599,826
	375.4	STRUCTURES AND IMPROVEMENTS - SMALL	2,453,680.05	313,880
	376.1	MAINS - EXCLUDING CATHODIC PROTECTION	426,654,001.60	119,581,152
	376.2	MAINS - CATHODIC PROTECTION	3,009,235.48	1,786,229
	378	MEASURING AND REGULATING STATION EQUIPMENT	11,811,798.18	4,610,360
	380	SERVICES	245,616,638.42	91,471,655
	381	METERS	18,771,077.33	7,079,694
	382	METER INSTALLATIONS	3,769,202.49	1,965,147
	384	HOUSE REGULATOR INSTALLATIONS	1,310,503.47	620,091
	385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	20,008,270.22	7,654,318
TOTAL DISTRIBUTION PLANT			**761,953,471.18**	**245,087,082.00**
GENERAL PLANT				
	390.11	OTHER SMALL STRUCTURES	1,443,596.77	156,669
	391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	389,725.94	150,489
	391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	294,962.33	212,829
	391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	9,304,387.88	5,059,293
	392	TRANSPORTATION EQUIPMENT	17,271,022.03	8,517,958
	394	TOOLS, SHOP AND GARAGE EQUIPMENT	12,168,098.41	2,723,391
	396	POWER OPERATED EQUIPMENT AND TOOLS	12,847,131.23	3,400,852
	397	COMMUNICATION EQUIPMENT	5,002,361.40	1,750,649
TOTAL GENERAL PLANT			**58,721,285.99**	**21,972,130.00**
TOTAL DEPRECIABLE GAS PLANT			**955,936,253.28**	**320,592,154.00**
NONDEPRECIABLE PLANT				
INTANGIBLE PLANT			123,845.54	
PRODUCTION PLANT			2,840.80	
TRANSMISSION PLANT			23,594.83	-256
DISTRIBUTION PLANT			1,083,410.41	4,041
GENERAL PLANT			67,330.91	-25,212
TOTAL NONDEPRECIABLE PLANT			**1,301,022.49**	**-21,427.00**
TOTAL GAS PLANT			**957,237,275.77**	**320,570,727.00**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027

Amortization of Experienced and Estimated Net Salvage

	2023		2024		2025		2026		2027			
ACCOUNT	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	NET SALVAGE	SALVAGE ACCRUAL
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)*	(13)=(12)/5
334		1,448.50		5,217.60		8,332.68		10,576.24		11,469.09	(37,044.11)	(7,409)
366				1,202.58				444.53		629.33	(2,276.44)	(455)
367.1		5,665.57		57,623.78		121,648.30		175,612.42		248,618.00	(609,168.07)	(121,834)
367.2		979.24		219.03		454.86		1,509.70		2,137.31	(5,300.13)	(1,060)
369.0		8,681.35		6,731.04		10,376.84		40,962.40		57,991.28	(124,742.91)	(24,949)
374	11,154.00	6,697.10	(10,168.60)	12,578.00		2,973.56	546.08	8,600.68	650.50	10,245.35	(38,912.71)	(7,783)
374.2		456.66				1,596.99		66,948.27		79,750.44	(148,752.36)	(29,750)
375.0	50.00	154,258.11		34,621.65		45,560.60	5.50	41,039.56	6.55	48,887.34	(324,305.21)	(64,861)
376	4,016.83	859,668.17	16,961.74	1,694,252.35		1,165,856.83	10,256.46	1,158,075.86	12,217.75	1,379,528.65	(6,213,929.08)	(1,242,786)
376.2		2,271.96		45.12				1,356.42		1,615.80	(5,289.29)	(1,058)
378.0		38,865.63		36,321.76		99,188.50		13,133.20		15,644.59	(203,153.68)	(40,631)
380		274,336.97		359,987.72		523,728.59		189,046.12		225,196.43	(1,572,295.83)	(314,459)
385		10,669.49	0.96	49,516.78		26,736.86	1.35	48,493.97	1.61	57,767.22	(193,180.41)	(38,636)
390		852.37									(852.37)	(170)
TOTAL	**15,220.83**	**1,364,851.12**	**6,794.10**	**2,258,317.41**	**0.00**	**2,006,454.61**	**10,809.38**	**1,755,799.36**	**12,876.41**	**2,139,480.81**	**(9,479,202.60)**	**(1,895,841)**

Current Amortization of Net Salvage Amount included in Depreciation Expense **-1,656,670**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Working Capital

Line No	Description	[1] Fully Projected Future Test Year October 31, 2027	[2] Reference
1	Working Capital for O&M Expenses	$ 7,195	C-4, Page 2
2	Interest Payments	(1,679)	C-4, Page 3
3	Tax Payment Lag Calculations	158	C-4, Page 4
4	Prepaid Expenses	1,080	C-4, Page 5
5	Total Working Capital Requirements	$ 6,755	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Summary of Working Capital

Line #	Description	[1] Reference	[2] Test Year Expenses	[3] Lead/Lag Days	[4] Weighted Average [2] * [3]	[5] Totals
WORKING CAPITAL REQUIREMENT						
1	REVENUE LAG DAYS	C-4, Page 3-5, HTY				47.16
2	EXPENSE LAG DAYS					
3	Purchased Gas Costs	Schedule A-1	$ 124,571	39.83	$ 4,961,646	
4	Other Expenses (less Uncollectibles)	Exhibit No. ATF-1 Schedule 1	35,748	41.01	1,466,034	
5	Payroll (Net Labor)	Exhibit No. ATF-1 Schedule 1	40,592	10.32	418,910	
6	Total	Sum (L 3 to L 5)	$ 200,911		$ 6,846,591	
7	O & M Expense Lag Days	L6, Col. 4 / Col. 2				34.08
8	Net (Lead) Lag Days	Line 1 - Line 7				13.08
9	Operating Expenses Per Day	Line 6, Col. 2 / 365				$ 550
10	Working Capital for O & M Expense	Line 8 * Line 9				$ 7,195
11	Interest Payments	Page 3				(1,679)
12	Tax Payment Lag Calculations	Page 4				158
13	Prepaid Expenses	Page 5				1,080
14	Total Working Capital Requirement	Sum (Line 10 to Line 13)				$ 6,755

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Interest Payments

Line No.	Description	[1] Reference Or Factor	[2] # of Days	[3] # of Days	[4] Total
1	Rate Base of October 31, 2027	Sch C-1			$ 571,582
2	Long-term Debt Ratio	Sch B-7			43.60%
3	Embedded Cost of Long-term Debt	Sch B-7			5.58%
4	Pro forma Interest Expense	L 1 * L 2 * L 3			$ 13,906
5	Daily Amount	L 4 / L 5 [Col 2]	365		$ 38
6	Days to mid-point of interest payments			91.25	
7	Less: Revenue Lag Days	Page 2		47.16	
8	Interest Payment lag days	L 7 - L 6			(44.1)
9	Total Interest for Working Capital	L 5 * L 8			$ (1,680)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027

Tax Lag Day Calculations

Line #	Description	[1] Payment Dates	[2] Mid-Point of Service Period	[3] Lead (Lag) Payment Days [1] - [2]	[4] Payment Amount	[5] Weighted Average [3] * [4]	[6] Payment Lead (Lag) Days [5] / [4]	[7] Revenue Lag Days	[8] Net Payment Lead (Lag) Days [6] - [7]	[9] Total Dollar Days	[10] Working Capital Amount 365
	FEDERAL INCOME TAX										
1	4th Quarter Estimate	09/15/26	04/01/26	(167.00)	$ 550	(91,808)					
2	1st Quarter Estimate	01/15/27	04/01/27	76.00	550	41,781					
3	2nd Quarter Estimate	03/15/27	04/01/27	17.00	550	9,346					
4	3rd Quarter Estimate	06/15/27	04/01/27	(75.00)	550	(41,231)					
5	Total				$ 2,199	$ (81,913)	(37.25)	(47.16)	9.91	$ 21,792	$ 60
	STATE INCOME TAX										
6	4th Quarter Estimate	09/15/26	04/01/26	(167.00)	$ 132	(22,086)					
7	1st Quarter Estimate	12/15/26	04/01/27	107.00	$ 132	14,151					
8	2nd Quarter Estimate	03/15/27	04/01/27	17.00	$ 132	2,248					
9	3rd Quarter Estimate	06/15/27	04/01/27	(75.00)	$ 132	(9,919)					
10	Total				$ 529	(15,606)	(29.50)	(47.16)	17.66	$ 9,342	$ 26
	PA PROPERTY TAX										
11	First Payment	03/11/27	12/30/27	294.00	21	6,145					
12	Second Payment	04/05/27	12/30/27	269.00	21	5,622					
13	Third Payment	08/03/27	12/30/27	149.00	21	3,114					
14	Fourth Payment	09/08/27	12/30/27	113.00	21	2,362					
16	Total				$ 84	17,243	206.25	(47.16)	253.41	$ 21,185	$ 58
	PURTA										
17	CY 2026 Purta Tax	10/15/26	07/02/26	(105.00)	9	(984)					
18	CY 2026 Purta Tax	11/15/26	07/02/26	(136.00)	9	(1,275)					
19	CY 2026 Purta Tax	12/15/26	07/02/26	(166.00)	9	(1,556)					
20	CY 2027 Purta Tax	01/15/27	07/02/27	168.00	9	1,575					
21	CY 2027 Purta Tax	02/15/27	07/02/27	137.00	9	1,284					
22	CY 2027 Purta Tax	03/15/27	07/02/27	109.00	9	1,022					
23	CY 2027 Purta Tax	04/15/27	07/02/27	78.00	9	731					
24	CY 2027 Purta Tax	05/15/27	07/02/27	48.00	9	450					
25	CY 2027 Purta Tax	06/15/27	07/02/27	17.00	9	159					
26	CY 2027 Purta Tax	07/15/27	07/02/27	(13.00)	9	(122)					
27	CY 2027 Purta Tax	08/15/27	07/02/27	(44.00)	9	(413)					
28	CY 2027 Purta Tax	09/15/27	07/02/27	(75.00)	9	(703)					
					$ 113	169	1.50	(47.16)	48.66	$ 5,474	$ 15
29	Total Working Capital For Other Taxes										$ 158

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027

Prepaid Expenses

Line #	Description	[1]	[2] TOTAL	[3] Insurance WP-09	[4] PUC Assessment WP-09	[5] AGA Dues WP-09	[6] IT Services WP-09
1	September 2026		1,597	680	834	(0)	84
2	October		1,479	572	812	23	73
3	November		1,264	476	714	12	62
4	December		1,048	378	618	(0)	52
5	January 2027		834	285	520	(13)	41
6	February		653	185	423	13	32
7	March		428	81	325	(0)	21
8	April		264	-	228	25	11
9	May		1,316	1,173	130	13	-
10	June		1,236	1,087	33	(0)	115
11	July		1,018	982	(65)	(13)	113
12	August		777	862	(162)	(25)	103
13	September		1,731	750	891	(0)	91
14	October 2027		1,479	572	812	23	73
15	TOTAL		$ 15,124	$ 8,082	$ 6,114	$ 57	$ 871
16	Percent to Gas			100.00%	100.00%	100.00%	100.00%
17	Amount to Gas			$ 8,082	$ 6,114	$ 57	$ 871
18	Monthly Average	14		$ 577	$ 437	$ 4	$ 62
19	Rate Case Amount		$ 1,080				

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Gas Inventory

Line No.	Description	[1] Stored Underground
1	October, 2026	$ 15,744
2	November	9,900
3	December	5,626
4	January, 2027	3,663
5	February	2,496
6	March	1,873
7	April	2,155
8	May	2,940
9	June	3,824
10	July	4,591
11	August	5,343
12	September	9,814
13	October, 2027	15,744
14		
15	Total	$ 83,714
16	12 month Modified Average Balance	$ 5,664

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Accumulated Deferred Income Taxes

Line #	Description		[1] Amount	[2] Total
	Accumulated Deferred Income Tax			
1	Gas Utility Plant - a/c #282	Exhibit EF-1	$ (73,222)	
2	Federal ADIT			(73,222)
3	Pro-Rata Adjustment		$ (703)	(703)
4	**Balance At October 31, 2027**	Exhibit EF-1		$ (73,925)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Customer Deposits

Line #	Description	[1] Balance At End Of Month
1	September, 2026	$ 5,144
2	October	$ 5,178
3	November	$ 5,321
4	December	$ 5,194
5	January, 2027	$ 5,170
6	February	$ 5,135
7	March	$ 5,114
8	April	$ 5,135
9	May	$ 5,166
10	June	$ 5,156
11	July	$ 5,133
12	August	$ 5,137
13	September	$ 5,144
14	October, 2027	$ 5,178
15	Total	$ 67,163
16	Number of Months	13
17	Average Monthly Balance	$ 5,166

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Materials & Supplies

Line #	Month	[1] Balance At End Of Month
1	September, 2026	$ 1,668
2	October	1,608
3	November	1,697
4	December	1,509
5	January, 2027	1,523
6	February	1,410
7	March	1,491
8	April	1,506
9	May	1,586
10	June	1,639
11	July	1,705
12	August	1,677
13	September	1,668
14	October, 2027	1,608
15	Total	$ 20,625
16	Number of Months	13
17	Average Monthly Balance	$ 1,587

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Summary of Revenue and Expenses
Pro Forma with Proposed Revenue Increase

Line #	Description	Factor Or Reference	[1] Pro Forma Test Year At Present Rates	[2] Pro Forma Test Year Rate Increase	[3] Pro Forma Test Year At Proposed Rates
	OPERATING REVENUES				
1	Customer & Distribution Revenue		$ 139,680	$ -	$ 139,680
2	Gas Supply & Cost Adjustment Revenue		124,571	-	124,571
3	Other Revenues		1,273	-	1,273
4	Revenue Increase			19,680	19,680
5	Total Operating Revenues		265,524	19,680	285,204
	OPERATING EXPENSES				
6	Manufactured Gas		29	-	29
7	Gas Supply Production		67,501	-	67,501
8	Transmission		58,233		58,233
9	Distribution		24,107	-	24,107
10	Customer Accounts		12,859	-	12,859
11	Uncollectible Expense	1.55%	3,121	305	3,426
12	Customer Information & Services		4,593	-	4,593
13	Sales		4	-	4
14	Administrative & General		33,603	-	33,603
15	Depreciation & Amortization		25,302	-	25,302
16	Taxes other than income taxes		2,489	-	2,489
17	Total Operating Expenses		231,839	305	232,144
18	Net operating income Before Income Tax		33,684	19,375	53,059
	Income Taxes				
19	Pro Forma Income Tax At Present Rates		(2,340)		(2,340)
20	Pro Forma Income Tax on Revenue Increase			5,215	5,215
21	Net Income (loss)		$ 36,025	$ 14,160	$ 50,184

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Summary of Pro Forma Revenue and Expense
Adjustments with Proposed Revenue Increase

Line #	Description	[1] Factor Or Reference	[2] Test Year At Present Rates FPFTY 10/31/27	[3] Adjustments Sch D-3 Increase (Decrease)	[4] Pro Forma Adjusted For Test Year 10/31/27	[5] Proposed Increase	[6] Pro Forma Test Year With Proposed Increase
	OPERATING REVENUES			-	[2] + [3]		[4] + [5]
1	Residential	480	$ 189,133	$ -	$ 189,133		$ 189,133
2	Comm/PA	481	30,271	-	30,271		30,271
3	Industrical	481	1,983	-	1,983		1,983
4	Transportation	489	42,862	-	42,862		42,862
5	Forfeited Discounts		1,125	-	1,125		1,125
6	Miscellaneous Service Revenues		48	-	48		48
7	Rent from Gas Properties		100	-	100		100
8	Rate Increase			-	-	19,680	19,680
9	Total Operating Revenues		265,524	-	265,524	19,680	285,204
	OPERATING EXPENSES						
10	Gas Production		29	-	29		29
11	Gas Supply Production		67,501	-	67,501		67,501
12	Transmission		58,233		58,233		58,233
13	Distribution		24,107	-	24,107		24,107
14	Customer Accounts		12,859	-	12,859		12,859
15	Uncollectible Expense	1.55%	3,121	-	3,121	305	3,426
16	Customer Information & Services		4,593	-	4,593		4,593
17	Sales		4	-	4		4
18	Administrative & General		33,487	116	33,603		33,603
19	Depreciation & Amortization		23,406	1,896	25,302		25,302
20	Taxes other than income taxes		2,151	338	2,489		2,489
21	Total Operating Expenses		229,490	2,350	231,839	305	232,144
22	Net Operating Income - BIT		$ 36,034	$ (2,350)	$ 33,684	$ 19,375	$ 53,059

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Summary of Pro Forma Adjustments

Line #	Description		[1] As Budgeted And Allocated	[2] Adjustments Reserved	[3] Adjustments Reserved	[4] Adjustments Reserved	[5] Adjustments Rate Case D-6	[6] Adjustments Regulatory Amortizations D-14	[7] Adjustments Sub-Total Adjustments	[8] Total Pro Forma
	OPERATING REVENUES									
	Customer & Distribution Revenue									
1	Residential	480	$ 89,078						$ -	$ 89,078
2	Comm/PA	481	12,261						-	12,261
3	Industrical	481	697						-	697
4	Transportation	489	37,643						-	37,643
	Revenue for Cost of Gas								-	-
5	Residential	480	100,055						-	100,055
6	Comm/PA	481	18,011						-	18,011
7	Industrical	489	1,286						-	1,286
8	Transportation	489	5,219						-	5,219
9	Forfeited Discounts		1,125						-	1,125
10	Miscellaneous Service Revenues		48							48
10	Rent from Gas Properties		100						-	100
11			-						-	-
12	Total Operating Revenues		265,524	-	-	-	-	-	-	265,524
	OPERATING EXPENSES									-
13	Gas Production		29						-	29
14	Gas Supply Production		67,501						-	67,501
15	Transmission		58,233							58,233
16	Distribution		24,107						-	24,107
17	Customer Accounts		12,859						-	12,859
18	Uncollectible Expense		3,121						-	3,121
19	Customer Information & Services		4,593						-	4,593
20	Sales		4						-	4
21	Administrative & General		33,487				344	-228	116	33,603
22	Depreciation & Amortization		23,406						-	23,406
23	Taxes other than income taxes		2,151						-	2,151
									-	-
24	Total Operating Expenses		$ 229,490	$ -	$ -	$ -	$ 344	$ (228)	$ 116	$ 229,606
25	Net operating income Before Income Tax		$ 36,034	$ -	$ -	$ -	$ (344)	$ 228	$ (116)	$ 35,918

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Summary of Pro Forma Adjustments

Line #	Description	[1] From Page 1 Sub-total	[2] Adjustments Reserved	[3] Adjustments Reserved	[4] Adjustments Reserved	[5] Adjustments Depreciation D-8	[6] Adjustments Taxes Other Than Income D-9	[7] TOTAL Adjusted
	OPERATING REVENUES							
26	**Customer & Distribution Revenue**							
27	Residential	$ 89,078						$ 89,078
28	Comm/PA	12,261						12,261
29	Industrical	697						697
30	Transportation	37,643						37,643
	Revenue for Cost of Gas							
31	Residential	100,055						100,055
32	Comm/PA	18,011						18,011
33	Industrical	1,286						1,286
34	Transportation	5,219						5,219
35	Forfeited Discounts	1,125						1,125
36	Miscellaneous Service Revenues	48						48
37	Rent from Gas Properties	100						100
38	-	-						-
39	Total Operating Revenues	265,524	-	-	-	-	-	265,524
	OPERATING EXPENSES							
40	Gas Production	29						29
41	Gas Supply Production	67,501						67,501
42	Transmission	58,233						58,233
43	Distribution	24,107						24,107
44	Customer Accounts	12,859						12,859
45	Uncollectible Expense	3,121						3,121
46	Customer Information & Services	4,593						4,593
47	Sales	4						4
48	Administrative & General	33,603						33,603
49	Depreciation & Amortization	23,406				1,896		25,302
50	Taxes other than income taxes	2,151					338	2,489
51	Total Operating Expenses	$ 229,606	$ -	$ -	$ -	$ 1,896	$ 338	$ 231,839
52	Net operating income Before Income Tax	$ 35,918	$ -	$ -	$ -	$ (1,896)	$ (338)	$ 33,684

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

SCHEDULE NOT USED

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Adjustment - Revenue Summary

Line #	Description	[1] Reference Or Account Number	[2] FPFTY 10/31/27	[4] Other Adjustments	[5] Total Proforma Adjustments	[6] Proforma Adjusted At Present Rates
	Customer & Distribution Revenue					
1	Residential	480	89,078		$ -	$ 89,078
2	Comm/PA	481	12,261		-	12,261
3	Industrical	481	697		-	697
4	Transportation	489	37,643		-	37,643
5	Cust Chg & Distrib Revenue		139,680	-	-	139,680
	Revenue for Cost of Gas					
6	Residential	480	100,055		-	100,055
7	Comm/PA	481	18,011		-	18,011
8	Industrical	481	1,286		-	1,286
9	Transportation	489	5,219		-	5,219
10	Revenue for Cost of Gas		124,571	-	-	124,571
						-
11	Total Customer Revenue		264,250	-	-	264,250
12	Forfeited Discounts	487	1,125			1,125
13	Miscellaneous Service Revenues	488	-			-
						-
14	Rent from Gas Properties	493	100			100
15	Other Revenues	495	48		-	48
16	TOTAL REVENUES		$ 265,524	$ -	$ -	$ 265,524

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Adjustment - Rate Case Expense

Line #	Description	[1] Reference	[2] Amount	[3] Total
	Rate Case Expenditures			
1	External Consultants			382
2	External Legal			480
3	Advertising/Miscellaneous Costs			170
4	Sub-Total	L 1 to L 3		1,032
	Total Expenditures for Rate Case Filing			
5	TOTAL COSTS	L 4		$ 1,032
6	Normalized over 3 year (Line 5 / 6)		3	$ 344
7	Pro Forma Adjustment	L6, [C3]		$ 344

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Adjustment - Uncollectibles

Line #	Description	[1] Reference Or Factor	[2] Adj Net Write-Offs	[3] Adj Gross Revenue	[4] Percent [2] / [3]	[5] Total [2] / [3]
Adjustment #1:						
1	12 Months ended September 2022		$ 2,851	$ 199,458	1.43%	
2	12 Months ended September 2023		$ 3,340	$ 216,182	1.55%	
3	12 Months ended September 2024		$ 4,312	$ 270,623	1.59%	
4	Three Year Average Sum (Line 1 to Line 3) / 3	3	$ 3,501	$ 228,754		1.53%
	Management Adj.					0.02%
	Uncollectible Factor					1.55%
5	Forecasted Revenue					$ 265,524
6	Forecasted Uncollectible Expense					$ 4,064
Adjustment #2:						
7	CAP Arrearages - Recovered in RIDER F			(749)		
8	Pro Forma Adjustment					$ (749)
9	Total Uncollectible Adjustment	L6 + L8				$ 3,314

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Adjustment - Depreciation expense

Line #	Description	[1] Account Number	[2] 10/31/27 Depreciation Expense	[3] Adjustment To Annualize At New Depre Study Rates	[4] Pro Forma Test Year Depreciation
INTANGIBLE PLANT					
1	Miscellaneous Intangible Plant	303	350	-	350
2	TOTAL INTANGIBLE		350	-	350
PRODUCTION PLANT					
3	Rights of Way	325.4	0.6	-	1
4	Field Measuring & Regulating Station Structures	328	0	-	0
5	Other Structures	329	0	-	0
6	Field Lines	332	14	-	14
7	Field Measuring & Reg. Station Equipment	334	132		132
			-	-	-
8	TOTAL PRODUCTION & GATHERING		146	-	146

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Adjustment - Depreciation expense

Line #	Description	[1] Account Number	[2] 10/31/27 Depreciation Expense	[3] Adjustment To Annualize At New Depre Study Rates	[4] Pro Forma Test Year Depreciation
TRANSMISSION PLANT					
9	Rights of Way	365.2	43		43
10	Structures & Improvements	366	6		6
11	Mains	367	1,673		1,673
12	Measuring & Regulating Station Equipment	369	182		182
13	TOTAL TRANSMISSION		1,904	-	1,904
DISTRIBUTION PLANT					
14	Land & Land Rights	374	225	-	225
15	Structures & Improvements	375	418		418
16	Mains	376	7,629		7,629
17	Measuring & Regulating Station Equipment	378	344		344
18	Services	380	5,247		5,247
19	Meters	381	549		549
20	Meter Installations	382	65		65
21	House Regulatory Installations	384	24		24
22	Industrial Measuring & Reg. Station Equipment	385	372		372
23	Other Property	386	-		-
24	TOTAL DISTRIBUTION		14,872	-	14,872
GENERAL PLANT					
25	Structures & Improvements	390	60		60
26	Office Furniture & Equipment	391	1,611		1,611
27	Transportation Equipment	392	2,180		2,180
28	Tools & Garage Equipment	394	488		488
29	Power Operated Equipment	396	1,304		1,304
30	Communication Equipment	397	491		491
31	Other Tangible Property	399	-	-	-
32	TOTAL GENERAL		6,134	-	6,134
33	TOTAL DEPRECIATION		$ 23,406	$ -	$ 23,406
34	CHARGED TO CLEARING ACCOUNTS		$ (3,484)	$ -	$ (3,484)
35	NET SALVAGE AMORTIZATION	Schedule C-3	$ 1,657	$ 239	$ 1,896

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Adjustment - Taxes Other Than Income Taxes

Line #	Description	[1] Account Number	[2] Factor or Reference	[3] FPFTY Amounts 10/31/27	[4] Pro Forma Adjustments	[5] Pro Forma Tax Expense 10/31/27
1	PURTA Taxes	408.1		$ 113	$ -	$ 113
2	Capital Stock	408.1		-		-
3	PA & Local Use taxes	408.1		(23)	-	(23)
4	Social Security	408.1	D-10	1,953	318	2,271
5	FUTA	408.1	D-10	11	1	12
6	SUTA	408.1	D-10	99	18	117
7	Total			$ 2,151	$ 338	$ 2,489

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Adjustment - Payroll Taxes

Line #	Description	[1] Account Number	[2] Test Year 9/30/25 Present Rates	[3] 10/31/27 Pro Forma Adjustments	[4] Increase in Payroll Taxes
1	Total Payroll Charged to Expense		$ 34,569	$ 40,194	
2	FICA Expense		1,953	2,271	318
3	FICA Expense - Percent	L 2 / L 1	5.65%	5.65%	
4	Pro Forma FICA Expense on Projected Payroll				$ 318
5	FUTA Expense		11	12	1
6	FUTA Expense - Percent	L 5 / L 1	0.03%	0.03%	
7	Pro Forma FUTA Expense on Projected Payroll				$ 1
8	SUTA Expense		99	117	18
9	SUTA Expense - Percent	L 8 / L 1	0.29%	0.29%	
10	Pro Forma SUTA Expense on Projected Payroll				$ 18
11	Pro Forma Adjustment	Sum L 4 to L 10			$ 338

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Income Tax Calculation

Line #	Description	[1] Factor Or Reference	[2] Element Or Amount	[3] Pro Forma Test Year At Present Rates	[4] Revenue Increase	[5] Pro Forma Test Year At Proposed Rates
						[3] + [4]
1	Revenue	Sch D-2		$ 265,524	$ 19,680	$ 285,204
2	Operating Expenses	Sch D-2		(231,839)	(305)	(232,144)
3	OIBIT	L1 + L2		33,684	19,375	53,059
	Interest Expense					
4	Rate Base	Sch A-1	571,582			
5	Weighted Cost of Debt	Sch B-7	0.02430			
6	Synchronized Interest Expense	L4 * L5		(13,889)	-	(13,889)
7	Base Taxable Income	L3 + L6		19,795	19,375	39,170
8	Total State Tax Depreciation	Sch D-12	$ 21,096			
9	Pro Forma Book Depreciation	Sch D-12	25,302			
10	State Tax Depreciation (Over) Under Book	L8 + L9		4,206		4,206
11	Other	EF-2		(36,109)	-	(36,109)
12	State Taxable Income/(Loss)	Sum L7 to L11		$ (12,108)	$ 19,375	$ 7,267
13	State Income Tax (Expense)/Benefit	-L12 * Rate State	7.49%	$ 907	$ (1,451)	$ (544)
13A	State Income Tax Benefit Adjustment (NOL not utilized)			(907)		
13B	Net State Income Tax	L13 Col (5)		$ -		$ (544)
14	Total Federal Tax Depreciation	Sch D-12	$ 17,163			
15	Pro Forma Book Depreciation	Sch D-12	25,302			
16	Federal Tax Deducts (Over) Under Book	L15 - L14		8,139	-	8,139
17	Other	EF-2		(36,109)	-	(36,109)
18	Federal Taxable Income/(Loss)	L7 + Sum L13 to L17		(8,175)	17,924	10,656
19	Federal Income Tax (Expense)/Benefit	-L18 * Rate Fed	21.00%	1,717	(3,764)	(2,238)
20	Total Current Income Tax (Expense)/Benefit	L13 + L19		1,717	(5,215)	(2,782)
	Deferred Federal Income Taxes					
21	Federal Tax Deducts (Over) Under Book	L16	$ 8,139			
22	Adjust for Book Flow Through Depreciation	EF-2	7,938			
23	Net Temporary Difference Depreciation	L22 - L21		(201)		(201)
24	Other Deferred Adjustments	EF-2		(1,500)		(1,500)
25	Federal Temporary Differences	L23 + L24		(1,701)	-	(1,701)
						-
26	Deferred Federal Taxable Income/(Loss)	L25		$ (1,701)	$ -	$ (1,701)
27	Deferred Federal Income Tax (Expense)/Benefit	-L26 * Rate Fed	21.00%	357	-	357
	Deferred State Income Taxes					
28	PA 2009 Repairs Section 481(a) Amortization	Stmt No. 12		330		330
						-
29	State Deferred Income Tax (Expense)/Benefit			330	-	330
30	Net Income Tax (Expense)/Benefit	L20 + L27 + L29		2,404	(5,215)	(2,095)
	Other Tax Adjustments					
31	PA 2009 Repairs Section 481(a) Amortization - Federal Benefit	Stmt No.12		(69)		(69)
32	Medicare Subsidy Amortization	EF-3		-		-
33	ARAM	Stmt No.12		950		950
34	Unprotected	Stmt No.12		(945)		(945)
35	Combined Income Tax (Expense)/Benefit	Sum L30 to L34		$ 2,340	$ (5,215)	$ (2,159)
36	Federal Income Tax (Expense)/Benefit	L 19 + L27 + Sum L31 to L34		$ 2,010	$ (3,764)	$ (1,945)
37	State Income Tax (Expense)/Benefit	L13 + L29		330	(1,451)	(214)
38	Total Income Tax (Expense)/Benefit	L36 + L37		$ 2,340	$ (5,215)	$ (2,159)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Tax Depreciation

Line #	Description	[1] Amount	[2] Amount	[3] Total
	Accelerated Tax Depreciation			
1	Gas Plant		$ 15,267	
2	Net Salvage Amortization		1,896	
3	Total Federal Accelerated Tax Depreciation			$ 17,163
4	Adjustment for PA Tax Depreciation		3,933	
5	Total State Accelerated Tax Depreciation			$21,096
	Book Depreciation			
6	Pro Forma Book Depreciation		$ 23,406	
7	Net Salvage Amortization		1,896	
8	Book Depreciation for Tax Calculation			$ 25,302

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Gross Revenue Conversion Factor

Line #	Description	[1] Reference Or Factor	[2] Tax Rate	[3] Factor
GROSS REVENUE CONVERSION FACTOR				
1	GROSS REVENUE FACTOR			1.000000
2	UNCOLLECTIBLE EXPENSES	D-7		(0.015500)
3	NET REVENUES	Sum L 1 to L 2		0.984500
4	STATE INCOME TAXES	[3] L 3 * Rate [2]	7.4900%	(0.073739)
5	FACTOR AFTER STATE TAXES	L 3 + L 4		0.910761
6	FEDERAL INCOME TAXES	[3] L 5 * Rate [2]	21.00%	(0.191260)
7	NET OPERATING INCOME FACTOR	L 5 + L 6		0.719501
8	GROSS REVENUE CONVERSION FACTOR	1 / L 7		1.389852
9	Combined Income Tax Factor On Gross Revenues	-L 4 - L 6		26.500%
INCOME TAX FACTOR				
10	GROSS REVENUE FACTOR			1.000000
11	STATE INCOME TAXES	[3] L 10 * Rate [2]	7.4900%	(0.074900)
12	FACTOR AFTER STATE TAXES	L 10 + L 11		0.925100
13	FEDERAL INCOME TAXES	[3] L 12 * Rate [2]	21.00%	(0.194271)
14	NET OPERATING INCOME FACTOR	L 12 + L 13		0.730829
15	GROSS REVENUE CONVERSION FACTOR	1 / L 14		1.368309
16	Combined Income Tax Factor On Taxable Income	-L 11 - L 13		26.917%

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Regulatory Amortizations

Line #	Description	[1] Reference	[2] Amount	[3] Total
	Regulatory Asset			
1	Medicare Subsidy	Statement No. 12		$ (925)
2	TCJA Over/Under Balance	Statement No. 2		$ 242
3	TOTAL COSTS	L1 + L2		$ (683)
4	Normalized over 3 year (Line 3 / 3)		3	$ (228)
4	Pro Forma Adjustment	L3		$ (228)

NATIONAL FUEL EXHIBIT A

FTY

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission

Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)
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NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission

Future Test Period - 12 Months Ended September 30, 2026

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NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Summary of Measure of Value and Revenue Increase

Line #	Description	[1] Function	[2] Reference Section	[3] Pro Forma Test Year Ended September 30, 2026 At Present Rates	[4] Increase	[5] Proposed Rates
RATE BASE						
1	Utility Plant		C-2	$ 884,622		$ 884,622
2	Accumulated Depreciation		C-3	(305,646)		(305,646)
3	Net Plant in service	L 1 + L 2		578,975	-	578,975
4	Working Capital		C-4	6,566		6,566
5	Gas Inventory		C-5	5,664		5,664
6	Accumulated Deferred Income Taxes		C-6	(74,407)		(74,407)
7	Customer Deposits		C-7	(5,164)		(5,164)
8	Materials & Supplies		C-8	1,591		1,591
9	TOTAL RATE BASE	Sum L 3 to L 8		$ 513,225	$ -	$ 513,225
OPERATING REVENUES AND EXPENSES						
	Operating Revenues					
10	Base Customer Charges		D1 & D-5	$ 138,231	$ 8,748	$ 146,979
11	Gas Cost Revenue		D-5	118,714		118,714
12	Other Operating Revenues		D-2	1,357		1,357
13	Total Revenues	Sum L 10 to L 12		258,302	8,748	267,050
14	Operating Expenses		D-1	(219,285)	(136)	(219,421)
15	OIBIT	L 13 + L 14		39,017	8,612	47,629
16	Pro Forma Income Tax at Present Rates		D-11	(113)		
17	Pro Forma Income Tax on Revenue Increase		D-11		(2,352)	(2,465)
18	NET OPERATING INCOME	Sum L 15 to L 17		$ 38,903	$ 6,260	$ 45,164
19	RATE OF RETURN	L 18 / L 9		7.5802%		8.8000%
22	RETURN ON EQUITY		B-7	9.16%		11.25%
REVENUE INCREASE REQUIRED						
20	Rate of Return at Present Rates	L 19, Col 3		7.58%		
21	Rate of Return Required		B-7	8.80%		
22	Change in ROR	L 22 - L 21		1.22%		
23	Change in Operating Income	L 23 * L 9		$ 6,260		
24	Gross Revenue Conversion Factor		D-13	1.397410		
25	Change in Revenues	L 24 * L 25		$ 8,748		
26	Percent Increase -- Delivery Revenues	L 26 / L 10, C 3			6.33%	
27	Percent Increase -- Total Revenues	L 26 / L 13, C 3			3.39%	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Schedule Not Used

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Statement of Net Utility Operating Income

Line No	Description	[1] FTY 9/30/2026	[2] Reference
	Total Operating Revenues		
1	Total Sales Revenues	$ 256,945	B-3
2	Other Operating Revenues	1,309	B-3
3	Total Revenues	258,254	
	Total Operating Expenses		
4	Operation & Maintenance Expenses	75,832	B-4 & D-2
5	Purchased Gas Expense	118,714	D-5
6	Depreciation & Amortization Expense	22,579	D-2
7	Taxes Other Than Income Taxes	2,151	B-5
8	Total Operating Expenses	219,277	
9	Operating Income Before Income Taxes (OIBIT)	38,978	
	Income Taxes:		
10	State	(239)	B-5
11	Federal	352	B-5
12	Total Income Taxes	113	
13	**Net Utility Operating Income**	$ 38,864	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Statement of Operating Revenues

Line No	Description	[1] FTY 9/30/2026
	Gas Operating Revenues	
1	Residential (480)	$ 184,369
2	Commercial/Public Authority (481)	29,777
3	Industrial (481)	1,987
4	Transportation (489)	40,813
5	Sub-Total Gas Operating Revenues	256,945
	Other Operating Revenues	
6	Forfeited Discounts (487)	1,209
7	Miscellaneous Service Revenues (488)	-
8	Rent from Gas Properties (493)	100
9	Other Revenues (495)	-
10	Sub-Total Other Operating Revenues	1,309
11	**Total Operating Revenues**	$ 258,254

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Operation and Maintenance Expenses

Line No	Description	Account No	[1] FTY 9/30/2026
	Gas Raw Materials		
1	Liquefied Petroleum Gas Expenses	717	$ -
2	Miscellaneous Production Expenses	735	-
3	Total Gas Raw Materials Expenses		-
	Production and Gathering - Operations		
4	Operating Supervision and Engineering	750	0
5	Production Maps and Records	751	-
6	Gas Wells Expenses	752	-
7	Field Lines Expenses	753	20
8	Gas Well Royalties	758	-
9	Other Expenses	759	(0)
10	Total Production & Gathering Operation Expenses		20
	Production and Gathering - Maintenance		
11	Maintenance of Producing Gas Wells	763	-
12	Maintenance of Field Lines	764	0
13	Maintenance of Field Measuring and Reg. Station Equip.	766	0
14	Gas Supply Operation Expenses		0
	Other Gas Supply Expense - Operations		
15	Other Gas Purchases	805.0	-
16	Purchases Gas Cost Adjustments	805.1	-
17	Purchased Gas Expenses	807.0	182
18	Gas Used for Other Utility Operations-Credit	812.0	(39)
19	Other Gas Supply Expenses	813.0	-
20	Gas Supply Operation Expenses		143
	Underground Storage Expense - Operation		
21	Operation Supervision and Engineering	814	-
22	Maps and Records	815	-
23	Wells Expenses	816	-
24	Lines Expenses	817	-
25	Measuring and Regulating Station Expenses	820	-
26	Purification Expenses	821	-
27	Gas Losses	823	-
28	Other Expenses	824	-
29	Total Underground Storage Expenses		-
	Underground Storage Expense - Maintenance		
30	Maintenance Supervision and Engineering	830	-
31	Maintenance of Structures and Improvements	831	-
32	Maintenance of Reservoirs and Wells	832	-
33	Maintenance of Lines	833	-
34	Maintenance of Measuring & Regulating Station Equip.	835	-
35	Total Underground Maintenance Expenses		-

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Operation and Maintenance Expenses

Line No	Description	Account No	[1] FTY 9/30/2026
	Transmission Expense - Operations		
36	Operating Supervision and Engineering	850	2
37	System Control and Load Dispatching	851	33
38	Communication System Expenses	852	-
39	Compressor Station Labor and Expenses	853	10
40	Mains Expenses	856	639
41	Measuring and Regulating Station Expenses	857	53
42	Other Expenses	859	52
43	Total Transmission Operation Expenses		789
	Transmission Expense - Maintenance		
44	Maintenance Supervision and Engineering	861	0
45	Maintenance of Structures and Improvements	862	17
46	Maintenance of Mains	863	133
47	Maintenance of Measuring and Regulating Station Equip.	865	26
48	Maintenance of Communication Equipment	866	-
49	Maintenance of Other Equipment	867	16
50	Total Transmission Maintenance Expenses		192
	Distribution Expense - Operations		
51	Operation Supervision and Engineering	870	6,054
52	Distribution Load Dispatching	871	754
53	Compressor Station Labor and Expenses	872	31
54	Compressor Station Fuel and Power (Major Only)	873	-
55	Mains and Services Expenses	874	4,141
56	Measuring and Regulating Station Expenses-General	875	344
57	Measuring and Regulating Station Expenses-Industrial	876	111
58	Measuring and Regulating Station Expenses-City Gate	877	8
59	Meter and House Regulator Expenses	878	943
60	Customer Installations Expenses	879	1,053
61	Other Expenses	880	5,076
62	Rents	881	116
63	Total Distribution Operation Expenses		18,630
	Distribution Expense - Maintenance		
64	Maintenance Supervision and Engineering	885	758
65	Maintenance of Structures and Improvements	886	539
66	Maintenance of Mains	887	1,518
67	Maintenance of Compressor Station Equipment	888	0
68	Maintenance of Measuring & Reg. Station Equip.-Genl.	889	193
69	Maintenance of Measuring & Reg. Station Equip.-Indtrl.	890	80
70	Maintenance of Measuring & Reg. Station Equip.-City G	891	-
71	Maintenance of Services	892	319
72	Maintenance of Meters & House Regulators	893	423
73	Maintenance of Other Equipment	894	140
74	Construction & Maintenance	895	-
75	Total Distribution Maintenance Expenses		3,970
	Customer Accounts Expense - Operations		
76	Supervision	901	1,426
77	Meter Reading Expenses	902	1,586
78	Customer Records & Collection Expenses	903	8,355
79	Uncollectable Accounts	904	2,976
80	Miscellaneous Customer Accounts Expenses	905	729
81	Total Administrative & General		15,072

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Operation and Maintenance Expenses

Line No	Description	Account No	[1] FTY 9/30/2026
	Customer Service & Information Expense		
82	Supervision	907	122
83	Customer Assistance Expenses	908	3,147
84	Informational & Instructional Advertising Expenses	909	810
85	Miscellaneous Customer Service & Informational Exp.	910	708
86	Total Cust. Service & Inform. Operations Exp		4,787
87	Description		
	Sales Expense		
88	Supervision	911	-
89	Demonstrating and Selling Expenses	912	-
90	Advertising Expenses	913	4
91	Miscellaneous Sales Expenses	916	-
92	Total Operation Sales Expenses		4
	Administrative & General - Operations		
93	Administrative and General Salaries	920.0	14,172
94	Office Supplies and Expenses	921.0	3,634
95	Administrative Expenses Transferred-Credit	922.0	(1,436)
96	Outside Service Employed	923.0	751
97	Property Insurance	924.0	103
98	Injuries and Damages	925.0	1,843
99	Employee Pensions and Benefits	926.0	8,569
100	Regulatory Commission Expenses	928.0	1,802
101	General Advertising Expenses	930.1	-
102	Miscellaneous General Expenses	930.2	519
103	Rents	931.0	1,270
104	Total A & G Operation Expenses		31,227
	Administrative & General - Maintenance		
105	A&G Maintenance of General Plant	932	474
106	A&G Maintenance of General Plant	935	-
107	Total A & G Maintenance Expenses		474
108	TOTAL OPERATION & MAINTENANCE EXPENSE		$ 75,307
109	Total Gas Operation Expenses		70,671
110	Total Gas Maintenance Expense		4,637
111	TOTAL OPERATION & MAINTENANCE EXPENSE		$ 75,307

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Detail of Taxes

Line No	Description	Reference	[1] FTY 9/30/2026
	Taxes Other Than Income Taxes		
	Non-revenue related:		
1	Pennsylvania - PURTA	D-9	$ 113
2	Capital Stock	D-9	-
3	PA and Local Use taxes	D-9	(23)
4	Subtotal		90
	Payroll Taxes		
5	FICA	D-9	1,953
6	SUTA	D-9	99
7	FUTA	D-9	11
8	Other		-
9	Subtotal		2,062
10	Total Taxes Other Than Income Taxes		$ 2,151
	Income Taxes		
11	State	D-11	$ (239)
12	Federal	D-11	352
13	Total Income Taxes		$ 113

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Composite Cost of Debt

Line No	Description	[1] Amount Outstanding	[2] Effective Cost Rate	[3] Effective Interest Rate	[4] Average Weighted Cost Rate
Medium Term Notes					
1	3.95% Due 2027	$ 100,000	4.15%	$ 4,150	
2	4.75% Due 2028	125,000	4.97%	6,213	
3	2.95% Due 2031	50,000	3.06%	1,530	
4	5.50% Due 2026	150,000	5.79%	8,685	
5	5.50% Due 2036	175,000	6.12%	10,710	
6	Total Long-Term Debt	$ 600,000		$ 31,288	5.21%
7	Commited Line of Credit Fee			875	
8	Total Long-Term Debt	$ 600,000		$ 32,162	5.36%
9	Total Short-Term Debt	-		$ -	
10	TOTAL DEBT	$ 600,000		$ 32,162	
11	Weighted Cost of Debt				5.36%

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026

Rate of Return

Line No	Description	[1] Capitalization Ratio	[2] Embedded Cost	[3] Statement Reference	[4] Return-%
1	Long-Term Debt	41.70%	5.36%	B-6	2.24%
2	Short-Term Debt	0.00%	0.00%	B-6	0.00%
3	Common Equity	58.30%	11.25%		6.56%
4	Total	100.00%			8.80%

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Rate Base

Line #	Description	[1] Reference Schedule	[2] # of Pages	[3] Pro Forma September 30, 2026 Present Rates	[4] Adjustments	[5] Pro Forma September 30, 2026 Proposed Rates
Rate Base						
1	Utility Plant	C-2	3	$ 884,622	-	$ 884,622
2	Accumulated Depreciation	C-3	2	(305,646)	-	(305,646)
3	Net Plant in service			578,975	-	578,975
4	Working Capital	C-4	5	6,566	-	6,566
5	Gas Inventory	C-5	1	5,664	-	5,664
6	Accumulated Deferred Income Taxes	C-6	1	(74,407)	-	(74,407)
7	Customer Deposits	C-7	1	(5,164)	-	(5,164)
8	Materials & Supplies	C-8	1	1,591	-	1,591
9	**TOTAL RATE BASE**			$ 513,225	$ -	$ 513,225

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Pro Forma Year End Plant Balances

Line #	Description	[1] Factor Or Reference	[2] Balance September 30, 2025	[3] FTY Additions	[4] FTY Retirements	[5] Pro Forma Test Year 9/30/26 [2] + [3]
1	Intangible Plant	Sch C-2, Page 4	$ 24,488	$ -	$ -	$ 24,488
2	Production Plant	Sch C-2, Page 4	3,782	438	(74)	$ 4,145
3	Transmission Plant	Sch C-2, Page 5	76,545	13,227	(529)	$ 89,243
4	Distribution Plant	Sch C-2, Page 5	672,974	44,455	(3,067)	$ 714,361
5	General Plant	Sch C-2, Page 5	45,567	10,034	(4,440)	$ 51,161
6	Non-Depreciable Plant	Sch C-2, Page 5	1,155	77	(9)	$ 1,224
7	Total Utility Plant		$ 824,511	$ 68,232	$ (8,120)	$ 884,622

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Pro Forma Year End Plant Balances

Line #	Description	[1] Account Number	[2] Balance September 30, 2025	[3] FTY Additions	[4] FTY Retirements	[5] Pro Forma September 30, 2026
	INTANGIBLE PLANT					
1	Miscellaneous Intangible Plant	303	24,488	-	-	24,488
2	TOTAL INTANGIBLE		24,488	-	-	24,488
	PRODUCTION PLANT					
3	Rights of Way	325.4	50	6	(1)	55
4	Field Measuring & Regulating Station Structures	328	10	1	(0)	11
5	Other Structures	329	3	0	(0)	3
6	Field Lines	332	445	52	(9)	488
7	Field Measuring & Reg. Station Equipment	334	3,275	378	(64)	3,589
8	TOTAL PRODUCTION & GATHERING		3,782	438	(74)	4,145

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Pro Forma Year End Plant Balances

Line #	Description	[1] Account Number	[2] Balance September 30, 2025	[3] FTY Additions	[4] FTY Retirements	[5] Pro Forma September 30, 2026
	TRANSMISSION PLANT					
9	Rights of Way	365.2	2,454	405	(16)	2,842
10	Structures & Improvements	366	220	38	(2)	256
11	Mains	367	66,342	11,500	(460)	77,381
12	Measuring & Regulating Station Equipment	369	7,530	1,285	(51)	8,763
13	TOTAL TRANSMISSION		76,545	13,227	(529.094)	89,243
	DISTRIBUTION PLANT					
14	Land & Land Rights	374	15,095	997	(69)	16,023
15	Structures & Improvements	375	12,273	819	(57)	13,035
16	Mains	376	379,533	25,045	(1,728)	402,850
17	Measuring & Regulating Station Equipment	378	10,422	694	(48)	11,068
18	Services	380	216,577	14,508	(1,001)	230,084
19	Meters	381	16,838	966	(67)	17,737
20	Meter Installations	382	3,324	223	(15)	3,531
21	House Regulatory Installations	384	1,159	76	(5)	1,229
22	Industrial Measuring & Reg. Station Equipment	385	17,754	1,126	(78)	18,802
23	TOTAL DISTRIBUTION		672,974	44,455	(3,067)	714,361
	GENERAL PLANT					
24	Structures & Improvements	390	1,412	25	(9)	1,428
25	Office Furniture & Equipment	391	7,958	1,683	(1,327)	8,314
26	Transportation Equipment	392	13,402	3,096	(1,139)	15,360
27	Tools & Garage Equipment	394	8,427	1,946	(75)	10,297
28	Power Operated Equipment	396	9,971	2,303	(847)	11,426
29	Communication Equipment	397	4,397	982	(1,043)	4,335
30	TOTAL GENERAL		45,567	10,034	(4,440)	51,161
31	TOTAL DEPRECIABLE PLANT		823,355	68,154	(8,111)	883,398
	NONDEPRECIABLE PLANT					
32	Intangible Plant		124	-	-	124
33	Production Plant		3	0	(0)	3
34	Transmission Plant		18	3	(0)	20
35	Distribution Plant		959	62	(4)	1,017
36	General Plant		52	12	(4)	60
	TOTAL NONDEPRECIABLE PLANT		1,155	77	(9)	1,224
37	Total Plant		$ 824,511	$ 68,232	$ (8,120)	$ 884,622

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF SEPTEMBER 30, 2026

	DEPRECIABLE GROUP		ORIGINAL COST AS OF 30-Sep-26	BOOK DEPRECIATION RESERVE
DEPRECIABLE PLANT				
303	MISCELLANEOUS INTANGIBLE PLANT		24,487,946	22,593,631
PRODUCTION PLANT				
325.4	RIGHTS OF WAY		55,007	35,810
328	MEASURING AND REGULATING STATION STRUCTURES		11,077	9,773
329	OTHER STRUCTURES		2,904	1,403
332	FIELD LINES		487,775	171,978
334	MEASURING AND REGULATING STATION EQUIPMENT		3,588,783	1,733,727
TOTAL PRODUCTION PLANT			**4,145,546**	**1,952,691.00**
TRANSMISSION PLANT				
365.2	RIGHTS OF WAY		2,842,251	682,851
366.2	MEASURING AND REGULATING STATION STRUCTURES		251,286	118,684
366.3	OTHER STRUCTURES		5,082	3,593
367.1	MAINS - EXCLUDING CATHODIC PROTECTION		72,491,899	20,383,572
367.2	MAINS - CATHODIC PROTECTION		4,889,292	2,294,098
369	MEASURING AND REGULATING STATION EQUIPMENT			
	1980 AND PRIOR		259,369	259,369
	1981 AND SUBSEQUENT		8,503,779	4,153,033
	TOTAL ACCOUNT 369		8,763,148	4,412,402
TOTAL TRANSMISSION PLANT			**89,242,958**	**27,895,200**
DISTRIBUTION PLANT				
374.2	RIGHTS OF WAY		16,023,146	3,338,953
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	*	11,234,351	6,230,571
375.4	STRUCTURES AND IMPROVEMENTS - SMALL		1,800,748	316,278
376.1	MAINS - EXCLUDING CATHODIC PROTECTION		400,109,008	114,664,307
376.2	MAINS - CATHODIC PROTECTION		2,741,104	1,732,866
378	MEASURING AND REGULATING STATION EQUIPMENT		11,068,313	4,293,395
380	SERVICES		230,084,471	87,631,319
381	METERS		17,736,870	6,622,195
382	METER INSTALLATIONS		3,530,906	1,924,742
384	HOUSE REGULATOR INSTALLATIONS		1,229,483	604,497
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT		18,802,490	7,424,326
TOTAL DISTRIBUTION PLANT			**714,360,889**	**234,783,449**
GENERAL PLANT				
390.11	OTHER SMALL STRUCTURES		1,428,041	98,290
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE		328,740	138,489
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT		244,974	210,181
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS		7,740,748	3,553,490
392	TRANSPORTATION EQUIPMENT		15,360,082	7,508,111
394	TOOLS, SHOP AND GARAGE EQUIPMENT		10,297,184	2,350,040
396	POWER OPERATED EQUIPMENT AND TOOLS		11,426,348	2,967,643
397	COMMUNICATION EQUIPMENT		4,335,043	1,603,148
TOTAL GENERAL PLANT			**51,161,159**	**18,429,392**
TOTAL DEPRECIABLE GAS PLANT			**883,398,498**	**305,654,363**
NONDEPRECIABLE PLANT				
INTANGIBLE PLANT			123,846	
PRODUCTION PLANT			2,841	
TRANSMISSION PLANT			20,193	(106)
DISTRIBUTION PLANT			1,016,687	12,895
GENERAL PLANT			59,857	(20,689)
TOTAL NONDEPRECIABLE PLANT			**1,223,423**	**-7,900**
TOTAL GAS PLANT			**884,621,921**	**305,646,463**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026

Amortization of Experienced and Estimated Net Salvage

	2022		2023		2024		2025		2026			
ACCOUNT	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	NET SALVAGE	SALVAGE ACCRUAL
(1)	(8)	(9)	(10)	(11)	(6)	(7)	(8)	(9)	(10)	(11)	(12)*	(13)=(12)/5
334.0		4,970.85		1,448.50		5,217.60		8,332.68		10,576.24	(30,545.87)	(6,109)
366.2						1,202.58				444.53	(1,647.11)	(329)
367		28,763.67		5,665.57		57,623.78		121,648.30		175,612.42	(389,313.74)	(77,863)
367.2		198.09		979.24		219.03		454.86		1,509.70	(3,360.92)	(672)
369.0		5,432.55		8,681.35		6,731.04		10,376.84		40,962.40	(72,184.18)	(14,437)
374			11,154.00	6,697.10	(10,168.60)	12,578.00		2,973.56	546.08	8,600.68	(29,317.86)	(5,864)
374.2				456.66				1,596.99		66,948.27	(69,001.92)	(13,800)
375.0		66,671.18	50.00	154,258.11		34,621.65		45,560.60	5.50	41,039.56	(342,095.60)	(68,419)
376	24,600.36	671,967.90	4,016.83	859,668.17	16,961.74	1,694,252.35		1,165,856.83	10,256.46	1,158,075.86	(5,493,985.72)	(1,098,797)
376				2,271.96		45.12				1,356.42	(3,673.50)	(735)
378		91,460.00		38,865.63		36,321.76		99,188.50		13,133.20	(278,969.09)	(55,794)
380		268,817.58		274,336.97		359,987.72		523,728.59		189,046.12	(1,615,916.98)	(323,183)
385	2.19	12,608.15		10,669.49	0.96	49,516.78		26,736.86	1.35	48,493.97	(148,020.75)	(29,604)
390				852.37							(852.37)	(170)
TOTAL	**24,602.55**	**1,150,889.97**	**15,220.83**	**1,364,851.12**	**6,794.10**	**2,258,317.41**	**0.00**	**2,006,454.61**	**10,809.38**	**1,755,799.36**	**(8,478,885.61)**	**(1,695,776)**

* COLUMN (12) EQUALS THE SUMMATION OF COLUMNS (2) THROUGH (11).

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Working Capital

Line No	Description	[1] Future Test Year September 30, 2026	[2] Reference
1	Working Capital for O&M Expenses	$ 6,796	C-4, Page 2
2	Interest Payments	(1,386)	C-4, Page 3
3	Tax Payment Lag Calculations	209	C-4, Page 4
4	Prepaid Expenses	947	C-4, Page 5
5	Total Working Capital Requirements	$ 6,566	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Summary of Working Capital

Line #	Description	[1] Reference	[2] Test Year Expenses	[3] Lead/Lag Days	[4] Weighted Average [2] * [3]	[5] Totals
WORKING CAPITAL REQUIREMENT						
1	REVENUE LAG DAYS	C-4, Page 3-5, HTY				47.16
2	EXPENSE LAG DAYS					
3	Purchased Gas Costs	Schedule A-1	$ 118,714	39.83	$ 4,728,380	
4	Other Expenses (less Uncollectibles)	Exhibit No. 1, Schedule 1 Formato	34,508	41.01	1,415,154	
5	Payroll (Net Labor)	Exhibit No. 1, Schedule 1 Formato	37,898	10.32	391,104	
6	Total	Sum (L 3 to L 5)	$ 191,119		$ 6,534,637	
7	O & M Expense Lag Days	L6, Col. 4 / Col. 2				34.19
8	Net (Lead) Lag Days	Line 1 - Line 7				12.97
9	Operating Expenses Per Day	Line 6, Col. 2 / 365				$ 524
10	Working Capital for O & M Expense	Line 8 * Line 9				$ 6,796
11	Interest Payments	Page 3				(1,386)
12	Tax Payment Lag Calculations	Page 4				209
13	Prepaid Expenses	Page 5				947
14	Total Working Capital Requirement	Sum (Line 10 to Line 13)				$ 6,566

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026

Interest Payments

Line No.	Description	[1] Reference Or Factor	[2] # of Days	[3] # of Days	[4] Total
1	Rate Base at September 30, 2026	Sch C-1			$ 513,225
2	Long-term Debt Ratio	Sch B-7			41.70%
3	Embedded Cost of Long-term Debt	Sch B-7			5.36%
4	Pro forma Interest Expense	L 1 * L 2 * L 3			$ 11,472
5	Daily Amount	L 4 / L 5 [Col 2]	365		$ 31
6	Days to mid-point of interest payments			91.25	
7	Less: Revenue Lag Days	C-4, Page 2		47.16	
8	Interest Payment lag days	L 7 - L 6			(44.1)
9	Total Interest for Working Capital	L 5 * L 8			$ (1,386)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026

Tax Lag Day Calculations

Line #	Description	[1] Payment Dates	[2] Mid-Point of Service Period	[3] Lead (Lag) Payment Days [1]-[2]	[4] Payment Amount	[5] Weighted Average [3]*[4]	[6] Payment Lead (Lag) Days [5]/[4]	[7] Revenue (Lag) Days	[8] Net Payment Lead (Lag) Days [6]-[7]	[9] Total Dollar Days	[10] Working Capital Amount
											365
1	**FEDERAL INCOME TAX**										
2	4th Quarter Estimate	09/15/25	04/01/25	(167.00)	$ 735	(122,703)					
3	1st Quarter Estimate	01/15/26	04/01/26	76.00	735	55,841					
4	2nd Quarter Estimate	03/15/26	04/01/26	17.00	735	12,491					
5	3rd Quarter Estimate	06/15/26	04/01/26	(75.00)	735	(55,106)					
6	Total				$ 2,939	$ (109,478)	(37.25)	(47.16)	9.91	$ 29,125	$ 80
7	**STATE INCOME TAX**										
8	4th Quarter Estimate	09/15/25	04/01/25	(167.00)	$ 291	(48,555)					
9	1st Quarter Estimate	12/15/25	04/01/26	107.00	291	31,110					
10	2nd Quarter Estimate	03/15/26	04/01/26	17.00	291	4,943					
11	3rd quarter Estimate	06/15/26	04/01/26	(75.00)	291	(21,806)					
12	Total				$ 1,163	(34,309)	(29.50)	(47.16)	17.66	$ 20,539	$ 56
13	**PA PROPERTY TAX**										
14	First Payment	03/11/26	12/30/26	294.00	21	6,145					
15	Second Payment	04/05/26	12/30/26	269.00	21	5,622					
16	Third Payment	08/03/26	12/30/26	149.00	21	3,114					
17	Fourth Payment	09/08/26	12/30/26	113.00	21	2,362					
						-					
19	Total				$ 84	17,243	206.25	(47.16)	253.41	$ 21,185	$ 58
	PURTA										
20	CY 2025 Purta Tax	10/15/25	07/02/25	(105.00)	9	(984)					
21	CY 2025 Purta Tax	11/15/25	07/02/25	(136.00)	9	(1,275)					
22	CY 2025 Purta Tax	12/15/25	07/02/25	(166.00)	9	(1,556)					
23	CY 2026 Purta Tax	01/15/26	07/02/26	168.00	9	1,575					
24	CY 2026 Purta Tax	02/15/26	07/02/26	137.00	9	1,284					
25	CY 2026 Purta Tax	03/15/26	07/02/26	109.00	9	1,022					
26	CY 2026 Purta Tax	04/15/26	07/02/26	78.00	9	731					
27	CY 2026 Purta Tax	05/15/26	07/02/26	48.00	9	450					
28	CY 2026 Purta Tax	06/15/26	07/02/26	17.00	9	159					
29	CY 2026 Purta Tax	07/15/26	07/02/26	(13.00)	9	(122)					
30	CY 2026 Purta Tax	08/15/26	07/02/26	(44.00)	9	(413)					
31	CY 2026 Purta Tax	09/15/26	07/02/26	(75.00)	9	(703)					
					$ 113	169	1.50	(47.16)	48.66	$ 5,474	$ 15
32	Total Working Capital For Other Taxes										$ 209

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026

Prepaid Expenses

Line #	Description	[1]	[2] TOTAL	[3] Insurance WP-09	[4] PUC Assessment WP-09	[5] AGA Dues WP-09	[6] IT Services WP-09
1	September, 2025		1,427	619	731	(0)	77
2	October		1,273	527	653	25	68
3	November		1,083	437	575	13	58
4	December		969	343	578	(0)	48
5	January, 2026		771	258	487	(13)	38
6	February		606	168	396	13	29
7	March		398	74	305	(0)	20
8	April		248	-	213	25	10
9	May		1,199	1,064	122	13	-
10	June		1,123	986	31	(0)	106
11	July		922	891	(60)	(13)	104
12	August		699	782	(152)	(25)	94
13	September, 2026		1,597	680	834	(0)	84
14	TOTAL		$ 12,315	$ 6,829	$ 4,713	$ 38	$ 735
15	Percent to Gas			100.00%	100.00%	100.00%	100.00%
16	Amount to Gas			$ 6,829	$ 4,713	$ 38	$ 735
17	Monthly Average	13		$ 525	$ 363	$ 3	$ 57
18	Rate Case Amount		$ 947				

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Gas Inventory

Line No.	Description	[1] Stored Underground
1	September 2025	$ 9,814
2	October	15,744
3	November	9,900
4	December	5,626
5	January, 2026	3,663
6	February	2,496
7	March	1,873
8	April	2,155
9	May	2,940
10	June	3,824
11	July	4,591
12	August	5,343
13	September, 2026	9,814
14	Total	$ 77,783
15	Number of Months	12
16	12 month Modified Average Balance	$ 5,664

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Accumulated Deferred Income Taxes

Line #	Description		[1] Amount	[2] Total
	Accumulated Deferred Income Tax			
1	Gas Utility Plant - a/c #282	Exhibit EF-1	$ (74,407)	
2	Federal ADIT			(74,407)
3	Pro-Rata Adjustment			-
4	**Balance At September 30, 2026**			$ (74,407)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Customer Deposits

Line #	Description	[1] Balance At End Of Month
1	September 2025	$ 5,144
2	October	$ 5,178
3	November	$ 5,321
4	December	$ 5,194
5	January, 2026	$ 5,170
6	February	$ 5,135
7	March	$ 5,114
8	April	$ 5,135
9	May	$ 5,166
10	June	$ 5,156
11	July	$ 5,133
12	August	$ 5,137
13	September, 2026	$ 5,144
14	Total	$ 67,128
15	Number of Months	13
16	Average Monthly Balance	$ 5,164

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Materials & Supplies

Line #	Month	[1] Materials & Supplies
1	September, 2025	1,668
2	October	1,608
3	November	1,697
4	December	1,509
5	January, 2026	1,523
6	February	1,410
7	March	1,491
8	April	1,506
9	May	1,586
10	June	1,639
11	July	1,705
12	August	1,677
13	September, 2026	1,668
14	Total	$ 20,685
15	Number of Months	13
16	Average Monthly Balance	$ 1,591

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Summary of Revenue and Expenses
Pro Forma with Proposed Revenue Increase

Line #	Description	Factor Or Reference	[1] Pro Forma Test Year At Present Rates	[2] Pro Forma Test Year Rate Increase	[3] Pro Forma Test Year At Proposed Rates
	OPERATING REVENUES				
1	Customer & Distribution Revenue		$ 138,231		$ 138,231
2	Gas Supply & Cost Adjustment Revenue		118,714		118,714
3	Other Revenues		1,357		1,357
4	Revenue Increase			8,748	8,748
5	Total operating revenues		258,302	8,748	267,050
	OPERATING EXPENSES				
6	Manufactured Gas		28	-	28
7	Gas Supply Production		64,328	-	64,328
8	Transmission		55,510		55,510
9	Distribution		22,601	-	22,601
10	Customer Accounts		12,096	-	12,096
11	Uncollectible Expense	1.53%	2,976	136	3,112
12	Customer Information & Services		4,787	-	4,787
13	Sales		4	-	4
14	Administrative & General		32,064	-	32,064
15	Depreciation & Amortization		22,579	-	22,579
16	Taxes other than income taxes		2,313	-	2,313
17	Total operating expenses		219,285	136	219,421
18	Net operating income Before Income Tax		39,017	8,612	47,629
	Income Taxes				
19	Pro Forma Income Tax At Present Rates		113		113
20	Pro Forma Income Tax on Revenue Increase			2,352	2,352
21	Net Income (loss)		$ 38,903	$ 6,260	$ 45,164

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Summary of Pro Forma Revenue and Expense Adjustments with Proposed Revenue Increase

Line #	Description	[1] Factor Or Reference	[2] Test Year At Present Rates FTY 09/30/26	[3] Adjustments Sch D-3 Increase (Decrease)	[4] Pro Forma Adjusted For Test Year 9/30/26	[5] Proposed Increase	[6] Pro Forma Test Year With Proposed Increase
	OPERATING REVENUES			-	[2] + [3]		[4] + [5]
1	Residential	480	$ 184,369	$ -	$ 184,369		$ 184,369
2	Comm/PA	481	29,777	-	29,777		29,777
3	Industrical	481	1,987	-	1,987		1,987
4	Transportation	489	40,813	-	40,813		40,813
5	Forfeited Discounts		1,209	-	1,209		1,209
6	Miscellaneous Service Revenues		48	-	48		48
7	Rent from Gas Properties		100	-	100		100
8	Rate Increase			-	-	8,748	8,748
9	Total operating revenues		258,302	-	258,302	8,748	267,050
	OPERATING EXPENSES						
10	Gas Production		28	-	28		28
11	Gas Supply Production		64,328	-	64,328		64,328
12	Transmission		55,510		55,510		55,510
13	Distribution		22,601	-	22,601		22,601
14	Customer Accounts		12,096	-	12,096		12,096
15	Uncollectible Expense	1.55%	2,976	-	2,976	136	3,112
16	Customer Information & Services		4,787	-	4,787		4,787
17	Sales		4	-	4		4
18	Administrative & General		31,701	363	32,064		32,064
19	Depreciation & Amortization		20,883	1,696	22,579		22,579
20	Taxes other than income taxes		2,151	162	2,313		2,313
21	Total operating expenses		217,065	2,221	219,285	136	219,421
22	Net Operating Income - BIT		$ 41,237	$ (2,221)	$ 39,017	$ 8,612	$ 47,629

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Summary of Pro Forma Adjustments

Line #	Description		[1] As Budgeted And Allocated	[2] Adjustments Gas Costs	[3] Adjustments Salaries & Wages	[4] Adjustments Environmental Expense	[5] Adjustments Rate Case D-6	[6] Adjustments Uncollectibles Expense D-7	[7] Adjustments Sub-Total Adjustments	[8] Total Proforma
	OPERATING REVENUES									
	Customer & Distribution Revenue									
1	Residential	480	$ 88,262						$ -	$ 88,262
2	Comm/PA	481	12,135						-	12,135
3	Industrical	481	703						-	703
4	Transportation	489	37,132						-	37,132
	Revenue for Cost of Gas								-	-
5	Residential	480	96,107						-	96,107
6	Comm/PA	481	17,642						-	17,642
7	Industrical	489	1,284						-	1,284
8	Transportation	489	3,681						-	3,681
9	Forfeited Discounts		1,209						-	1,209
10	Miscellaneous Service Revenues		48						-	48
11	Rent from Gas Properties		100						-	100
12			-						-	-
13	Total operating revenues		258,302	-	-	-	-	-	-	258,302
	OPERATING EXPENSES									-
14	Gas Production		28						-	28
15	Gas Supply Production		64,328							64,328
16	Transmission		55,510							55,510
17	Distribution		22,601						-	22,601
18	Customer Accounts		12,096						-	12,096
19	Uncollectible Expense		2,976						-	2,976
20	Customer Information & Services		4,787						-	4,787
21	Sales		4						-	4
22	Administrative & General		31,701				363		363	32,064
23	Depreciation & Amortization		20,883						-	20,883
24	Taxes other than income taxes		2,151						-	2,151
									-	-
25	Total operating expenses		$ 217,065	$ -	$ -	$ -	$ 363	$ -	$ 363	$ 217,428
26	Net operating income Before Income Tax		$ 41,237	$ -	$ -	$ -	$ (363)	$ -	$ (363)	$ 40,874

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Summary of Pro Forma Adjustments

Line #	Description	[1] From Page 1 Sub-total	[2] Adjustments Other Adjustments	[3] Adjustments Universal Service	[4] Adjustments Operations S & W	[5] Adjustments Depreciation D-8	[6] Adjustments Taxes Other Than Income D-9	[7] TOTAL Adjusted
	OPERATING REVENUES							
27	**Customer & Distribution Revenue**							
28	Residential	$ 88,262						$ 88,262
29	Comm/PA	12,135						12,135
30	Industrical	703						703
31	Transportation	37,132						37,132
	Revenue for Cost of Gas							-
32	Residential	96,107						96,107
33	Comm/PA	17,642						17,642
34	Industrical	1,284						1,284
35	Transportation	3,681						3,681
36	Forfeited Discounts	1,209						1,209
37	Miscellaneous Service Revenues	48						48
38	Rent from Gas Properties	100						100
39	-	-						-
40	Total operating revenues	258,302	-	-	-	-	-	258,302
	OPERATING EXPENSES							
41	Gas Production	28						28
42	Gas Supply Production	64,328						64,328
43	Transmission	55,510						55,510
44	Distribution	22,601						22,601
45	Customer Accounts	12,096						12,096
46	Uncollectible Expense	2,976						2,976
47	Customer Information & Services	4,787						4,787
48	Sales	4						4
49	Administrative & General	32,064						32,064
50	Depreciation & Amortization	20,883				1,696		22,579
51	Taxes other than income taxes	2,151					162	2,313
52	Total operating expenses	$ 217,428	$ -	$ -	$ -	$ 1,696	$ 162	$ 219,285
53	Net operating income Before Income Tax	$ 40,874	$ -	$ -	$ -	$ (1,696)	$ (162)	$ 39,017

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

SCHEDULE NOT USED

Schedule: D-5
Witness: C. Mann
Page: 1 of 1

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Revenue Adjustments

Line #	Description	[1] Reference Or Account Number	[2] FTY 09/30/26	[3] PRO FORMA ADJUSTMENTS Reserved	[4] PRO FORMA ADJUSTMENTS Reserved	[5] Total Proforma Adjustments	[6] Proforma Adjusted At Present Rates
	Customer & Distribution Revenue						
1	Residential	480	$ 88,262			$ -	$ 88,262
2	Comm/PA	481	12,135			-	12,135
3	Industrical	481	703			-	703
4	Transportation	489	37,132			-	37,132
5	Cust Chg & Distrib Revenue		138,231	-	-	-	138,231
	Revenue for Cost of Gas						
6	Residential	480	96,107			-	96,107
7	Comm/PA	481	17,642			-	17,642
8	Industrical	481	1,284			-	1,284
9	Transportation	489	3,681	-		-	3,681
10	Revenue for Cost of Gas		118,714	-	-	-	118,714
							-
11	Total Customer Revenue		256,945	-	-	-	256,945
12	Forfeited Discounts	487	1,209			-	1,209
13	Miscellaneous Service Revenues	488	-			-	-
							-
14	Rent from Gas Properties	493	100		-	-	100
15	Other Revenues	495	48			-	48
16	TOTAL REVENUES		$ 258,302	$ -	$ -	$ -	$ 258,302

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Rate Case Expense

Line #	Description	[1] Reference	[2] Amount	[3] Total
	Rate Case Expenditures			
1	External Consultants			339
2	External Legal			350
3	Advertising/Miscellaneous Costs			400
4	Sub-Total	L 1 to L 3		1,089
	Total Expenditures for Rate Case Filing			
5	TOTAL COSTS	L 3		$ 1,089
6	Normalized over 3 years (Line 5 / 6)		3	$ 363
7	Pro Forma Adjustment	L6		$ 363

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Uncollectibles

Line #	Description	[1] Reference Or Factor	[2] Adj Uncollectible Expense	[3] Adj Tariff Revenue	[4] Percent [2] / [3]	[5] Total [2] / [3]
Adjustment #1:						
1	12 Months ended September 2022		$ 2,851	$ 199,458	1.43%	
2	12 Months ended September 2023		$ 3,340	$ 216,182	1.54%	
3	12 Months ended September 2024		$ 4,312	$ 270,623	1.59%	
4	Three Year Average Sum (Line 1 to Line 3) / 3	3	$ 3,501	$ 228,754		1.53%
	Management Adj					0.02%
	Uncollectibl Factor					1.55%
5	Forecasted Revenue					$ 258,302
6	Forecasted Uncollectible Expense					$ 3,953
Adjustment #2:						
7	CAP Arrearages - Recovered in RIDER F			(749)		
8	Pro Forma Adjustment					$ (749)
9	Total Uncollectible Adjustment	L6 + L8				$ 3,204

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Depreciation Expense

Line #	Description	[1] Account Number	[2] 9/30/26 Depreciation Expense	[3] Adjustment To Annualize At New Depre Study Rates	[4] Pro Forma Test Year Depreciation
INTANGIBLE PLANT					
1	Miscellaneous Intangible Plant	303	386	-	386
2	TOTAL INTANGIBLE		386	-	386
PRODUCTION PLANT					
3	Rights of Way	325.4	1	-	1
4	Field Measuring & Regulating Station Structures	328	0	-	0
5	Other Structures	329	0	-	0
6	Field Lines	332	12		12
7	Field Measuring & Reg. Station Equipment	334	114	-	114
8	TOTAL PRODUCTION & GATHERING		127	-	127

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Depreciation Expense

Line #	Description	[1] Account Number	[2] 9/30/26 Depreciation Expense	[3] Adjustment To Annualize At New Depre Study Rates	[4] Pro Forma Test Year Depreciation
TRANSMISSION PLANT					
9	Rights of Way	365.2	36		36
10	Structures & Improvements	366	5		5
11	Mains	367	1,336		1,336
12	Measuring & Regulating Station Equipment	369	136		136
13	TOTAL TRANSMISSION		1,513	-	1,513
DISTRIBUTION PLANT					
14	Land & Land Rights	374	208	-	208
15	Structures & Improvements	375	405		405
16	Mains	376	7,126		7,126
17	Measuring & Regulating Station Equipment	378	325		325
18	Services	380	4,815		4,815
19	Meters	381	524		524
20	Meter Installations	382	57		57
21	House Regulatory Installations	384	21		21
22	Industrial Measuring & Reg. Station Equipment	385	343		343
23	TOTAL DISTRIBUTION		13,825	-	13,825
GENERAL PLANT					
24	Structures & Improvements	390	67		67
25	Office Furniture & Equipment	391	1,408		1,408
26	Transportation Equipment	392	1,733		1,733
27	Tools & Garage Equipment	394	409		409
28	Power Operated Equipment	396	992		992
29	Communication Equipment	397	423		423
30	TOTAL GENERAL		5,032	-	5,032
31	TOTAL DEPRECIATION		$ 20,883	$ -	$ 20,883
32	CHARGED TO CLEARING ACCOUNTS		$ (2,725)	$ -	$ (2,725)
33	NET SALVAGE AMORTIZATION	Schedule C-3, page 6	$ 1,696	$ -	$ 1,696

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Taxes Other Than Income Taxes

Line #	Description	[1] Account Number	[2] Factor or Reference	[3] FTY Amounts 9/30/26	[4] Pro Forma Adjustments	[5] Pro Forma Tax Expense 9/30/26
1	PURTA Taxes	408.1		$ 113	$ -	$ 113
2	Capital Stock	408.1		-		-
3	PA & Local Use taxes	408.1		(23)	-	(23)
4	Social Security	408.1	D-10	1,953	152	2,105
5	FUTA	408.1	D-10	11	0	11
6	SUTA	408.1	D-10	99	9	108
7	Total			$ 2,151	$ 162	$ 2,313

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Payroll Taxes

Line #	Description	[1] Account Number	[2] Test Year 9/30/25 Present Rates	[3] 9/30/26 Pro Forma Adjustments	[4] Increase in Payroll Taxes
1	Total Payroll Charged to Expense		$ 34,569	$ 37,248	
2	FICA Expense	D-9	1,953	2,105	152
3	FICA Expense - Percent	L 2 / L 1	5.65%	5.65%	
4	Pro Forma FICA Expense on Pro Forma S&W	L2 [4]			$ 152
5	FUTA Expense	D-9	11	11	0
6	FUTA Expense - Percent	L 5 / L 1	0.03%	0.03%	
7	Pro Forma FUTA Expense on Pro Forma S&W	L5 [4]			$ 0
8	SUTA Expense	D-9	99	108	9
9	SUTA Expense - Percent	L 8 / L 1	0.29%	0.29%	
10	Pro Forma SUTA Expense on Pro Forma S&W	L8 [4]			$ 9
11	Pro Forma Adjustment	L4+L7+L10			$ 162

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Income Tax Calculation

Line #	Description	[1] Factor Or Reference	[2] Element Or Amount	[3] Pro Forma Test Year At Present Rates	[4] Revenue Increase	[5] Pro Forma Test Year At Proposed Rates [3] + [4]
1	Revenue	Sch D-2		$ 258,302	$ 8,748	$ 267,050
2	Operating Expenses	Sch D-2		(219,285)	(136)	(219,421)
3	OIBIT	L1 + L2		39,017	8,612	47,629
	Interest Expense					
4	Rate Base	Sch A-1	513,225			
5	Weighted Cost of Debt	Sch B-7	0.02240			
6	Synchronized Interest Expense	L4 * L5		(11,496)	-	(11,496)
7	Base Taxable Income	L3 + L6		27,521	8,612	36,133
8	Total State Tax Depreciation	Sch D-12	$ 16,191			
9	Pro Forma Book Depreciation	Sch D-12	22,579			
10	State Tax Depreciation (Over) Under Book	L8 + L9		6,388		6,388
11	Other	EF-2		(32,768)	-	(32,768)
12	State Taxable Income/(Loss)	Sum L7 to L11		$ 1,141	$ 8,612	$ 9,753
13	State Income Tax (Expense)/Benefit	-L12 * Rate State	7.99%	$ (91)	$ (688)	$ (779)
14	Total Federal Tax Depreciation	Sch D-12	$ 14,425			
15	Pro Forma Book Depreciation	Sch D-12	22,579			
16	Federal Tax Deducts (Over) Under Book	L15 - L14		8,154	-	8,154
17	Other	EF-2		(32,768)	-	(32,768)
18	Federal Taxable Income/(Loss)	L7 + Sum L13 to L17		2,816	7,924	10,740
19	Federal Income Tax (Expense)/Benefit	-L18 * Rate Fed	21.00%	(591)	(1,664)	(2,255)
20	Total Current Income Tax (Expense)/Benefit	L13 + L19		(682)	(2,352)	(3,035)
	Deferred Federal Income Taxes					
21	Federal Tax Deducts (Over) Under Book	L16	$ 8,154			
22	Adjust for Book Flow Through Depreciation	EF-2	6,800			
23	Net Temporary Difference Depreciation	L22 - L21		(1,354)		(1,354)
24	Other Deferred Adjustments	EF-2		(1,500)		(1,500)
25	Federal Temporary Differences	L23 + L24		(2,854)	-	(2,854)
26	Deferred Federal Taxable Income/(Loss)	L25		$ (2,854)	$ -	$ (2,854)
27	Deferred Federal Income Tax (Expense)/Benefit	-L26 * Rate Fed	21.00%	599	-	599
	Deferred State Income Taxes					
28	PA 2009 Repairs Section 481(a) Amortization	Stmt No. 12		330		330
29	State Deferred Income Tax (Expense)/Benefit			330	-	330
30	Net Income Tax (Expense)/Benefit	L20 + L27 + L29		247	(2,352)	(2,106)
	Other Tax Adjustments					
31	PA 2009 Repairs Section 481(a) Amortization - Federal Benefit	Stmt No. 12		(69)		(69)
32	Medicare Subsidy Amortization	EF-3		(208)		(208)
33	ARAM	Stmt No. 12		950		950
34	Unprotected	Stmt No. 12		(1,033)		(1,033)
35	Combined Income Tax (Expense)/Benefit	Sum L30 to L34		$ (113)	$ (2,352)	$ (2,466)
36	Federal Income Tax (Expense)/Benefit	L19 + L27 + Sum L31 to L34		$ (352)	$ (1,664)	$ (2,017)
37	State Income Tax (Expense)/Benefit	L13 + L29		239	(688)	(449)
38	Total Income Tax (Expense)/Benefit	L36 + L37		$ (113)	$ (2,352)	$ (2,466)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Tax Depreciation

Line #	Description	[1] Amount	[2] Amount	[3] Total
	Accelerated Tax Depreciation			
1	Gas Plant		$ 12,729	
2	Net Salvage Amortization		1,696	
3	Total Federal Accelerated Tax Depreciation			$ 14,425
4	Adjustment for PA Tax Depreciation		1,766	
5	Total State Accelerated Tax Depreciation			$16,191
	Book Depreciation			
6	Pro Forma Book Depreciation		$ 20,883	
7	Net Salvage Amortization		1,696	
8	Book Depreciation for Tax Calculation			$ 22,579

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Future Test Period - 12 Months Ended September 30, 2026
($ in Thousands)

Gross Revenue Conversion Factor

Line #	Description	[1] Reference Or Factor	[2] Tax Rate	[3] Factor
GROSS REVENUE CONVERSION FACTOR				
1	GROSS REVENUE FACTOR			1.000000
2	UNCOLLECTIBLE EXPENSES	D-7		(0.015505)
3	NET REVENUES	Sum L 1 to L 2		0.984495
4	STATE INCOME TAXES	[3] L 3 * Rate [2]	7.9900%	(0.078661)
5	FACTOR AFTER STATE TAXES	L 3 + L 4		0.905834
6	FEDERAL INCOME TAXES	[3] L 5 * Rate [2]	21.00%	(0.190225)
7	NET OPERATING INCOME FACTOR	L 5 + L 6		0.715609
8	GROSS REVENUE CONVERSION FACTOR	1 / L 7		1.39741
9	Combined Income Tax Factor On Gross Revenues	-L 4 - L 6		26.889%
INCOME TAX FACTOR				
10	GROSS REVENUE FACTOR			1.000000
11	STATE INCOME TAXES	[3] L 10 * Rate [2]	7.9900%	(0.079900)
12	FACTOR AFTER STATE TAXES	L 10 + L 11		0.920100
13	FEDERAL INCOME TAXES	[3] L 12 * Rate [2]	21.00%	(0.193221)
14	NET OPERATING INCOME FACTOR	L 12 + L 13		0.726879
15	GROSS REVENUE CONVERSION FACTOR	1 / L 14		1.375745
16	Combined Income Tax Factor On Taxable Income	-L 11 - L 13		27.312%

NATIONAL FUEL EXHIBIT A

HTY

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission

Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)
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NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission

Historic Test Period - 12 Months Ended September 30, 2025

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NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Summary of Rate Base and Revenue Increase

Line #	Description	[1] Function	[2] Reference Section	[3] Pro Forma Test Year Ended September 30, 2025 At Present Rates	[4] Increase	[5] Proposed Rates
RATE BASE						
1	Utility Plant		C-2	$ 824,511		$ 824,511
2	Accumulated Depreciation		C-3	(292,387)		(292,387)
3	Net Plant in service	L 1 + L 2		532,124	-	532,124
4	Working Capital		C-4	6,081		6,081
5	Gas Inventory		C-5	5,729		5,729
6	Accumulated Deferred Income Taxes		C-6	(76,126)		(76,126)
7	Customer Deposits		C-7	(5,152)		(5,152)
8	Materials & Supplies		C-8	1,551		1,551
9	TOTAL RATE BASE	Sum L 3 to L 8		$ 464,206	$ -	$ 464,206
OPERATING REVENUES AND EXPENSES						
	Operating Revenues					
10	Base Customer Charges		D-5	$ 136,057	$ 1,991	$ 138,048
11	Gas Cost Revenue		D-5	102,219		102,219
12	Other Operating Revenues		D-5	1,463		1,463
13	Total Revenues	Sum L 10 to L 12		239,739	1,991	241,730
14	Operating Expenses		D-1	(198,151)	(30)	(198,181)
15	OIBIT	L 13 + L 14		41,588	1,961	43,549
16	Pro Forma Income Tax at Present Rates		D-11	(2,805)		
17	Pro Forma Income Tax on Revenue Increase		D-11		(543)	(3,348)
18	NET OPERATING INCOME	Sum L 15 to L 17		$ 38,783	$ 1,417	$ 40,200
19	RATE OF RETURN	L 18 / L 9		8.35%		8.66%
20	RETURN ON EQUITY		B-7	10.70%		11.25%
REVENUE INCREASE REQUIRED						
21	Rate of Return at Present Rates	L 19, Col 3		8.35%		
22	Rate of Return Required		B-7	8.66%		
23	Change in ROR	L 22 - L 21		0.31%		
24	Change in Operating Income	L 23 * L 9		$ 1,417		
25	Gross Revenue Conversion Factor		D-13	1.4048		
26	Change in Revenues	L 24 * L 25		$ 1,991		
27	Percent Increase -- Delivery Revenues	L 26 / L 10, C 3			1.46%	
28	Percent Increase -- Total Revenues	L 26 / L 13, C 3			0.83%	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Pro-Forma Balance Sheet

Line No	Description/(Account No)	[1] Historic 9/30/2025
	UTILITY PLANT (101 - 106, 108)	
1	Gas Utility Plant	$ 825,240
2	Other Utility Plant	-
3	Total Plant In Service	825,240
4	Construction Work In Progress (107)	24,850
5	Total Utility Plant	850,090
6	Accumulated Provision for Depreciation - Gas (108)	(292,196)
7	Utility Acquisition Adjustment (114)	-
8	Accumulated Provision for Depreciation - Other (119)	-
9	Net Utility Plant	557,894
	OTHER PROPERTY INVESTMENTS	
10	Non-utility Property (121)	-
11	Accumulated Depreciation on NUP (122)	-
12	Other Investments (124)	4,126
13	Other Special Funds (128)	46,866
14	Total Other Property and Investments	50,992
	CURRENT AND ACCRUED ASSETS	
15	Cash & Other Temporary Investments(131-136)	217,670
16	Unbilled Revenues	-
17	Customer Accounts Receivable (142)	10,721
18	Other Accounts Receivable (143)	709
19	Accum Provision for Uncollectible (144)	(3,893)
20	Receivables from Associated Companies (145)	-
21	Accounts Receivable Assoc. Comp. (146)	343
22	Plant Materials & Operating Supplies (154)	1,488
23	Stores Expense - Undistributed (163)	180
24	Gas Stored - Current (164.1)	9,814
25	Liquefied Natural Gas stored (164.2)	-
26	Prepayments (165)	1,480
27	Accrued Utility Revenues (173)	5,366
28	Miscellaneous Current & Accrued Assets (174)	-
29	Derivative Instrument Assets (175)	-
30	Total Current and Accrued Assets	243,878
	DEFERRED DEBITS	
31	Unamortized Debt Expense (181)	-
32	Other Regulatory Assets (182.3)	86,712
33	Other Preliminary Survey & Investigation Charges (183.2)	903
34	Clearing Accounts (184)	(2,346)
35	Miscellaneous Deferred Debits (186)	(967)
36	RD&D Expenditures (188)	5
37	Unamortized Loss on Reacquired Debt (189)	576
38	Accumulated Deferred Income Taxes (190)	-
39	O/U Collected Gas (191.4, 191.41)	948
40	Total Deferred Debits	85,831
41	TOTAL ASSETS AND OTHER DEBITS	$ 938,595

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Pro-Forma Balance Sheet

Line No	Description/(Account No)	[1] Historic 9/30/2025
	PROPRIETARY CAPITAL	
42	Common Stock Issued (201)	$ (16,037)
43	Preferred Stock Issued (204)	-
44	Premium on Capital Stock (207)	(69)
45	Donations Stockholders (208)	(64,069)
46	Retained Earnings (216)	(267,745)
47	Accum Other Comprehensive Income (219)	12,750
48	Total Proprietary Capital	(335,170)
	LONG TERM DEBT	
49	Bonds (221)	-
50	Advances from Associated Companies (223)	(184,638)
51	Other Long-Term Debt (224)	-
52	Unamortized Premium on LTD (225)	-
53	Unamortized Discount on LTD (226)	-
54	Total Long-term Debt	(184,638)
	OTHER NON-CURRENT LIABILITIES	
55	Obligations under Capital Leases (227)	-
56	Accum. Prov for Injuries & Damages (228.2)	(289)
57	Accum. Prov for Pensions & Benefits (228.3)	(9,210)
58	Accum. Miscellaneous Operating Prov (228.4)	-
59	Asset Retirement Obligation (230)	(4,463)
60	Total Non-Current Liabilities	(13,962)
	CURRENT & ACCRUED LIABILITIES	
61	Notes Payable (231)	-
62	Accounts Payable (232)	(123,697)
63	Notes Payable to Assoc. Companies (233)	(59,386)
64	Accounts Payable to Assoc. Cos (234)	(4,902)
65	Customer Deposits (235)	(5,144)
66	Taxes Accrued (236)	4,132
67	Interest Accrued (237)	-
68	Dividends Declared (238)	(4,528)
69	Tax Collections Payable (241)	(1,098)
70	Misc Current & Accrued Liabilities (242)	(4,540)
71	Total Current & Accrued Liabilities	(199,165)
	OTHER DEFERRED CREDITS	
72	Customer Advances for Construction (252)	(49)
73	Other Deferred Credits (253)	(20)
74	Other Regulatory Liabilities (254)	(91,561)
75	Deferred ITC (255)	-
76	Accumulated Deferred Income Taxes (282)	(53,239)
77	Accumulated Deferred Income Taxes (283)	(60,792)
78	Total Other Deferred Credits	(205,661)
79	TOTAL LIABILITIES & OTHER CREDITS	$ (938,595)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Statement of Net Utility Operating Income

Line No	Description	[1] Historic 9/30/2025	[2] Reference
	Total Operating Revenues		
1	Total Sales Revenues	$ 238,276	B-3
2	Other Operating Revenues	1,463	B-3
3	Total Revenues	239,739	
	Total Operating Expenses		
4	Operation & Maintenance Expenses	75,055	B-4 & D-2
1	Purchased Gas Costs	102,219	D-5
2	Depreciation & Amortization Expense	19,245	D-2
3	Taxes Other Than Income Taxes	2,151	B-5
4	Total Operating Expenses	198,670	
5	Operating Income Before Income Taxes (OIBIT)	41,069	
	Income Taxes:		
6	State	461	B-5
7	Federal	2,344	B-5
8	Total Income Taxes	2,805	
9	**Net Utility Operating Income**	$ 38,264	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Statement of Operating Revenues

Line No	Description	[1] Historic 9/30/2025
	Gas Operating Revenues	
1	Residential (480)	$ 163,839
2	Commercial/Public Authority (481)	27,222
3	Industrial (481)	2,054
4	Transportation (489)	45,161
5	Sub-Total Gas Operating Revenues	238,276
	Other Operating Revenues	
6	Forfeited Discounts (487)	1,146
7	Miscellaneous Service Revenues (488)	-
8	Rent from Gas Properties (493)	100
9	Other Revenues (495)	217
10	Sub-Total Other Operating Revenues	1,463
11	**Total Operating Revenues**	$ 239,739

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Operation and Maintenance Expenses

Line No	Description	Account No	[1] Historic 9/30/2025
	Gas Raw Materials		
1	Liquefied Petroleum Gas Expenses	717	$ -
2	Miscellaneous Production Expenses	735	-
3	Total Gas Raw Materials Expenses		-
	Production and Gathering - Operations		
4	Operating Supervision and Engineering	750	0
5	Production Maps and Records	751	-
6	Gas Wells Expenses	752	-
7	Field Lines Expenses	753	18
8	Gas Well Royalties	758	-
9	Other Expenses	759	(0)
10	Total Production & Gathering Operation Expenses		18
	Production and Gathering - Maintenance		
11	Maintenance of Producing Gas Wells	763	-
12	Maintenance of Field Lines	764	0
13	Maintenance of Field Measuring and Reg. Station Equip.	766	0
14	Gas Supply Operation Expenses		1
	Other Gas Supply Expense - Operations		
15	Other Gas Purchases	805.0	528
16	Purchased Gas Expenses	807.0	173
17	Gas Used for Other Utility Operations-Credit	812.0	(38)
18	Other Gas Supply Expenses	813.0	-
19	Gas Supply Operation Expenses		663
	Underground Storage Expense - Operation		
20	Operation Supervision and Engineering	814	-
21	Maps and Records	815	-
22	Wells Expenses	816	-
23	Lines Expenses	817	-
24	Measuring and Regulating Station Expenses	820	-
25	Purification Expenses	821	-
26	Gas Losses	823	-
27	Other Expenses	824	-
28	Total Underground Storage Expenses		-
	Underground Storage Expense - Maintenance		
29	Maintenance Supervision and Engineering	830	-
30	Maintenance of Structures and Improvements	831	-
31	Maintenance of Reservoirs and Wells	832	-
32	Maintenance of Lines	833	-
33	Maintenance of Measuring & Regulating Station Equip.	835	-
34	Total Underground Maintenance Expenses		-

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Operation and Maintenance Expenses

Line No	Description	Account No	[1] Historic 9/30/2025
	Transmission Expense - Operations		
35	Operating Supervision and Engineering	850	3
36	System Control and Load Dispatching	851	31
37	Communication System Expenses	852	-
38	Compressor Station Labor and Expenses	853	9
38	Mains Expenses	856	616
39	Measuring and Regulating Station Expenses	857	51
40	Other Expenses	859	49
41	Total Transmission Operation Expenses		759
	Transmission Expense - Maintenance		
42	Maintenance Supervision and Engineering	861	0
43	Maintenance of Structures and Improvements	862	17
44	Maintenance of Mains	863	131
45	Maintenance of Measuring and Regulating Station Equip.	865	24
46	Maintenance of Communication Equipment	866	-
47	Maintenance of Other Equipment	867	15
48	Total Transmission Maintenance Expenses		187
	Distribution Expense - Operations		
49	Operation Supervision and Engineering	870	5,762
50	Distribution Load Dispatching	871	710
51	Compressor Station Labor and Expenses	872	29
51	Compressor Station Fuel and Power (Major Only)	873	-
52	Mains and Services Expenses	874	4,161
53	Measuring and Regulating Station Expenses-General	875	337
54	Measuring and Regulating Station Expenses-Industrial	876	108
55	Measuring and Regulating Station Expenses-City Gate	877	8
56	Meter and House Regulator Expenses	878	931
57	Customer Installations Expenses	879	1,014
58	Other Expenses	880	5,453
59	Rents	881	110
60	Total Distribution Operation Expenses		18,624
	Distribution Expense - Maintenance		
61	Maintenance Supervision and Engineering	885	719
62	Maintenance of Structures and Improvements	886	506
63	Maintenance of Mains	887	1,514
64	Maintenance of Compressor Station Equipment	888	0
65	Maintenance of Measuring & Reg. Station Equip.-Genl.	889	185
66	Maintenance of Measuring & Reg. Station Equip.-Indtrl.	890	77
67	Maintenance of Measuring & Reg. Station Equip.-City G	891	-
68	Maintenance of Services	892	332
69	Maintenance of Meters & House Regulators	893	399
70	Maintenance of Other Equipment	894	135
71	Construction & Maintenance	895	-
72	Total Distribution Maintenance Expenses		3,867
	Customer Accounts Expense - Operations		
73	Supervision	901	1,291
74	Meter Reading Expenses	902	1,626
75	Customer Records & Collection Expenses	903	6,728
76	Uncollectable Accounts	904	4,376
77	Miscellaneous Customer Accounts Expenses	905	450
78	Total Administrative & General		14,471

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Operation and Maintenance Expenses

Line No	Description	Account No	[1] Historic 9/30/2025
	Customer Service & Information Expense		
79	Supervision	907	111
80	Customer Assistance Expenses	908	2,665
81	Informational & Instructional Advertising Expenses	909	783
82	Miscellaneous Customer Service & Informational Exp.	910	648
83	Total Cust. Service & Inform. Operations Exp		4,208
84	Description		
	Sales Expense		
85	Supervision	911	-
86	Demonstrating and Selling Expenses	912	-
87	Advertising Expenses	913	4
88	Miscellaneous Sales Expenses	916	-
89	Total Operation Sales Expenses		4
	Administrative & General - Operations		
90	Administrative and General Salaries	920.0	12,896
91	Office Supplies and Expenses	921.0	3,189
92	Administrative Expenses Transferred-Credit	922.0	(1,292)
92	Outside Service Employed	923.0	682
93	Property Insurance	924.0	94
94	Injuries and Damages	925.0	1,658
95	Employee Pensions and Benefits	926.0	6,507
96	Regulatory Commission Expenses	928.0	1,603
97	General Advertising Expenses	930.1	-
98	Miscellaneous General Expenses	930.2	1,742
99	Rents	931.0	1,206
100	Total A & G Operation Expenses		28,284
	Administrative & General - Maintenance		
101	A&G Maintenance of General Plant	932	442
102	A&G Maintenance of General Plant	935	-
103	Total A & G Maintenance Expenses		442
104	TOTAL OPERATION & MAINTENANCE EXPENSE		$ 71,526
105	Total Gas Operation Expenses		67,030
106	Total Gas Maintenance Expense		4,496
107	TOTAL OPERATION & MAINTENANCE EXPENSE		$ 71,526

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Detail of Taxes

Line No	Description	Reference	[1] Historic 9/30/2025
	Taxes Other Than Income Taxes		
	Non-revenue related:		
1	Pennsylvania - PURTA	D-9	$ 113
2	Capital Stock	D-9	-
3	PA and Local Use taxes	D-9	84
4	Subtotal		196
	Payroll Taxes		
5	FICA	D-9	1,953
6	SUTA	D-9	99
7	FUTA	D-9	11
8	Other		(107)
9	Subtotal		1,955
10	Total Taxes Other Than Income Taxes		$ 2,151
	Income Taxes		
11	State	D-11	$ 461
12	Federal	D-11	2,344
13	Total Income Taxes		$ 2,805

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Composite Cost of Debt

Line No	Description	[1] Amount Outstanding	[2] Effective Cost Rate	[3] Annualized Cost	[4] Average Weighted Cost Rate
Medium Term Notes					
1	3.95% Due 2027	100,000	4.15%	$ 4,150	
2	4.75% Due 2028	125,000	4.97%	6,213	
3	2.95% Due 2031	50,000	3.06%	1,530	
4	5.50% Due 2026	150,000	5.79%	8,685	
5	5.949% Due 2035	175,000	6.12%	10,710	
6	Total Long-Term Debt	$ 600,000		$ 31,288	5.21%
7	Commited Line of Credit Fee			896	
8	Total Long-Term Debt	$ 600,000		$ 32,184	5.36%
9	Total Short-Term Debt			-	
10	TOTAL DEBT	$ 600,000		$ 32,184	
11	Weighted Cost of Debt				5.36%

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025

Rate of Return

Line No	Description	[1] Capitalization Ratio	[2] Embedded Cost	[3] Statement Reference	[4] Return-%
1	Long-Term Debt	43.90%	5.36%	B-6	2.35%
2	Short-Term Debt	0.00%	0.00%	B-6	0.00%
3	Common Equity	56.10%	11.25%		6.31%
4	Total	100.00%			8.66%

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Rate Base

Line #	Description	[1] Reference Schedule	[2] # of Pages	[3] 9/30/2025 Present Rates	[4] Adjustments	[5] 9/30/2025 Proposed Rates
Rate Base						
1	Utility Plant	C-2	3	$ 824,511		$ 824,511
2	Accumulated Depreciation	C-3	2	(292,387)		(292,387)
3	Net Plant in service			532,124	-	532,124
4	Working Capital	C-4	8	6,081		6,081
5	Gas Inventory	C-5	1	5,729		5,729
6	Accumulated Deferred Income Taxes	C-6	1	(76,126)		(76,126)
7	Customer Deposits	C-7	1	(5,152)		(5,152)
8	Materials & Supplies	C-8	1	1,551		1,551
9	**TOTAL RATE BASE**			$ 464,206	$ -	$ 464,206

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Schedule: **C-2**
Witness: **M.M. Duszenko**

Pro Forma Plant Adjustment Summary

Line #	Description	[1] Factor Or Reference	[2] Historic Test Year **9/30/2025**	[3] Adjustments	[4] Pro Forma Test Year **9/30/2025** [2] + [3]
1	Intangible Plant	Sch C-2, Pg 4	$ 24,612	$ -	$ 24,612
2	Production Plant	Sch C-2, Pg 4	3,741	43	3,785
3	Transmission Plant	Sch C-2, Page 5	76,005	558	76,562
4	Distribution Plant	Sch C-2, Page 5	663,973	9,959	673,932
5	General Plant	Sch C-2, Page 5	43,499	2,120	45,619
6	Total Utility Plant		$ 811,830	$ 12,681	$ 824,511

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Schedule: **C-2**
Witness: **M.M. Duszenko**
Page: **2 of 3**

Pro Forma Year End Plant Balances

Line #	Description	[1] Account Number	[2] Year Ended **9/30/2025**	[3] Pro Forma Adjustment	[4] Pro Forma Balance
INTANGIBLE PLANT					
1	Organization	301	$ 116	$ -	$ 116
2	Franchise & Consent	302	7	-	7
3	Miscellaneous Intangible Plant	303	24,488	-	24,488
4	TOTAL INTANGIBLE		24,612	-	24,612
PRODUCTION PLANT					
5	Rights of Way	325.4	50	-	50
6	Other Land Rights	325.5	3	-	3
7	Field Measuring & Regulating Station Structures	328	10	-	10
8	Other Structures	329	3	-	3
9	Field Lines	332	445	-	445
10	Field Measuring & Reg. Station Equipment	334	3,231	43	3,275
11	TOTAL PRODUCTION PLANT		3,741	43	3,785

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Schedule: **C-2**
Witness: **M.M. Duszenko**
Page: **3 of 3**

Pro Forma Year End Plant Balances

Line #	Description	[1] Account Number	[2] Year Ended **9/30/2025**	[4] Pro Forma Adjustment	[5] Pro Forma Balance
	TRANSMISSION PLANT				
12	Land & Land Rights	365.1	18		18
13	Rights of Way	365.2	2,328	125	2,454
14	Measuring & Regulating Station Structures	366.2	216	-	216
15	Other Structures	366.3	4	-	4
16	Mains	367	66,058	284	66,342
17	Measuring & Regulating Station Equipment	369	7,381	149	7,530
18	TOTAL TRANSMISSION		76,005	558	76,562
	DISTRIBUTION PLANT				
19	Land & Land Rights	374	15,816	281	16,097
20	Structures & Improvements	375	12,229	-	12,229
21	Mains	376	373,425	6,108	379,533
22	Measuring & Regulating Station Equipment	378	10,360	61	10,422
23	Services	380	216,421	156	216,577
24	Meters	381	14,414	2,424	16,838
25	Meter Installations	382	3,324	-	3,324
26	House Regulatory Installations	384	1,159	-	1,159
27	Industrial Measuring & Reg. Station Equipment	385	16,826	928	17,754
28	TOTAL DISTRIBUTION		663,973	9,959	673,932
	GENERAL PLANT				
29	Land & Land Rights	389	52	0	52
30	Structures & Improvements	390	108	1,304	1,412
31	Office Furniture & Equipment	391	7,288	670	7,958
32	Transportation Equipment	392	13,402	-	13,402
33	Tools & Garage Equipment	394	8,427	-	8,427
34	Power Operated Equipment	396	9,971	-	9,971
35	Communication Equipment	397	4,251	146	4,397
36	TOTAL GENERAL		43,499	2,120	45,619
37	Total Plant		$ 811,830	$ 12,681	$ 824,511

Summary of Accumulated Depreciation

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF SEPTEMBER 30, 2025

	DEPRECIABLE GROUP	ORIGINAL COST AS OF 30-Sep-25	BOOK DEPRECIATION RESERVE
DEPRECIABLE PLANT			
303	MISCELLANEOUS INTANGIBLE PLANT	24,487,946.38	20,948,041
PRODUCTION PLANT			
325.4	RIGHTS OF WAY	49,880.62	36,419
328	MEASURING AND REGULATING STATION STRUCTURES	10,095.84	9,957
329	OTHER STRUCTURES	2,650.00	1,384
332	FIELD LINES	444,586.00	169,496
334	MEASURING AND REGULATING STATION EQUIPMENT	3,274,793.21	1,706,176
TOTAL PRODUCTION PLANT		**3,782,005.67**	**1,923,431**
TRANSMISSION PLANT			
365.2	RIGHTS OF WAY	2,453,606.71	665,680
366.2	MEASURING AND REGULATING STATION STRUCTURES	215,723.34	116,213
366.3	OTHER STRUCTURES	3,811.68	3,637
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	62,556,320.47	19,860,314
367.2	MAINS - CATHODIC PROTECTION	3,785,338.94	2,211,073
369	MEASURING AND REGULATING STATION EQUIPMENT		
	1980 AND PRIOR	290,199.76	290,200
	1981 AND SUBSEQUENT	7,239,700.81	4,094,495
	TOTAL ACCOUNT 369	7,529,900.57	4,384,695
TOTAL TRANSMISSION PLANT		**76,544,701.71**	**27,241,612**
DISTRIBUTION PLANT			
374.2	RIGHTS OF WAY	15,094,770.41	3,275,141
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	11,039,558.11	5,856,013
375.4	STRUCTURES AND IMPROVEMENTS - SMALL	1,232,946.64	328,390
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	377,025,040.28	109,664,023
376.2	MAINS - CATHODIC PROTECTION	2,507,932.83	1,684,792
378	MEASURING AND REGULATING STATION EQUIPMENT	10,421,765.98	3,971,454
380	SERVICES	216,577,440.01	83,883,689
381	METERS	16,837,506.89	6,166,777
382	METER INSTALLATIONS	3,323,679.35	1,888,692
384	HOUSE REGULATOR INSTALLATIONS	1,159,025.60	590,253
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	17,753,923.12	7,198,874
TOTAL DISTRIBUTION PLANT		**672,973,589.22**	**224,508,098**
GENERAL PLANT			
390.11	OTHER SMALL STRUCTURES	1,412,106.29	30,192
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	267,456.09	128,890
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	218,003.15	218,003
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	7,472,860.23	3,372,033
392	TRANSPORTATION EQUIPMENT	13,402,345.26	6,913,935
394	TOOLS, SHOP AND GARAGE EQUIPMENT	8,426,595.72	2,052,863
396	POWER OPERATED EQUIPMENT AND TOOLS	9,970,754.52	2,822,852
397	COMMUNICATION EQUIPMENT	4,396,954.45	2,222,231
TOTAL GENERAL PLANT		**45,567,075.71**	**17,760,999**
TOTAL DEPRECIABLE GAS PLANT		**823,355,318.69**	**292,382,180**
NONDEPRECIABLE PLANT			
INTANGIBLE PLANT		123,845.54	
PRODUCTION PLANT		2,840.80	
TRANSMISSION PLANT		17,652.36	
DISTRIBUTION PLANT		958,663.92	20,997
GENERAL PLANT		52,201.68	-16,289
TOTAL NONDEPRECIABLE PLANT		**1,155,204.30**	**4,708**
TOTAL GAS PLANT		**824,510,522.99**	**292,386,888**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025

Table 2. Amortization of Experienced Net Salvage

	2021		2022		2023		2024		2025			
ACCOUNT	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	NET SALVAGE	SALVAGE ACCRUAL
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)*	(13)=(12)/5
334		4,910.71		4,970.85		1,448.50		5,217.60		8,332.68	(24,880.34)	(4,976)
366								1,202.58			(1,202.58)	(241)
367.1		117,441.79		28,763.67		5,665.57		57,623.78		121,648.30	(331,143.11)	(66,229)
367.2		219.75		198.09		979.24		219.03		454.86	(2,070.97)	(414)
369.0		15,090.22		5,432.55		8,681.35		6,731.04		10,376.84	(46,312.00)	(9,262)
374					11,154.00	6,697.10	(10,168.60)	12,578.00		2,973.56	(21,263.26)	(4,253)
374.2						456.66				1,596.99	(2,053.65)	(411)
375.0		72,182.50		66,671.18	50.00	154,258.11		34,621.65		45,560.60	(373,244.04)	(74,649)
376		754,656.81	24,600.36	671,967.90	4,016.83	859,668.17	16,961.74	1,694,252.35		1,165,856.83	(5,100,823.13)	(1,020,165)
376.2		554.72				2,271.96		45.12			(2,871.80)	(574)
378.0		48,112.59		91,460.00		38,865.63		36,321.76		99,188.50	(313,948.48)	(62,790)
380		482,041.77		268,817.58		274,336.97		359,987.72		523,728.59	(1,908,912.63)	(381,783)
385		13,720.71	2.19	12,608.15		10,669.49	0.96	49,516.78		26,736.86	(113,248.84)	(22,650)
390						852.37					(852.37)	(170)
TOTAL	0.00	1,508,931.57	24,602.55	1,150,889.97	15,220.83	1,364,851.12	6,794.10	2,258,317.41	0.00	2,006,454.61	(8,242,827.20)	(1,648,567)

Current Amortization of Net Salvage Amount included in Depreciation Expense per last Company Depreciation Study **-1,656,670**

* COLUMN (12) EQUALS THE SUMMATION OF COLUMNS (2) THROUGH (11).

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Schedule: C-4
Witness: M.M. Duszenko
Page: 1 of 8

Working Capital

Line No	Description	[1] Historic Test Year September 30, 2025	[2] Reference
1	Working Capital for O&M Expenses	$ 6,348	C-4, Page 2
2	Interest Payments	(1,321)	C-4, Page 4
3	Tax Payment Lag Calculations	184	C-4, Page 5
4	Prepaid Expenses	870	C-4, Page 6
5	Total Working Capital Requirements	$ 6,081	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Schedule: C-4
Witness: M.M. Duszenko
Page: 2 of 8

Summary of Working Capital

Line #	Description	Reference	[1] Test Year Expenses	[2] Lead/Lag Days	[3] Weighted Average [2] * [3]	[4] Totals	[5]
WORKING CAPITAL REQUIREMENT							
1	REVENUE LAG DAYS	Page 3, Line 23					47.16
2	EXPENSE LAG DAYS	Page 6					
3	Purchased Gas Costs	Page 7	113,769	39.83	4,531,616		
4	Other Expenses (less Uncollectibles)	Page 6, Sch. 1, Exhibit 1, Formato	31,144	41.01	1,277,200		
5	Payroll (Net Labor)	Page 6, Sch. 1, Exhibit 1, Formato	$ 35,099	10.32	$ 362,384		
6	Total	Sum (L 3 to L 5)	$ 180,012		$ 6,171,200		
7	O & M Expense Lag Days	L6, Col. 4 / Col. 2					34.28
8	Net (Lead) Lag Days	Line 1 - Line 7					12.88
9	Operating Expenses Per Day	Line 6, Col. 2 / 365				$	493
10	Working Capital for O & M Expense	Line 8 * Line 9				$	6,348
11	Interest Payments	Page 8					(1,321)
12	Tax Payment Lag Calculations	Page 9					184
13	Prepaid Expenses	Page 10					870
14	Total Working Capital Requirement	Sum (Line 10 to Line 13)				$	6,081

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
12 Months Ended September 30, 2025
($ in Thousands)

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Revenue Lag

Line No.	Description	[1] Reference Or Factor	[2] Accounts Receivable Balance End of Month WP-01	[3] Total Monthly Sales WP-02	[4] A/R Turnover [3] / [2]	[5] Days Lag 365 / [4]
1	Annual Number of Days					365
2	September, 2024		6,113			
3	October		2,672	13,896		
4	November		4,494	20,359		
5	December		14,593	30,580		
6	January, 2025		27,130	39,107		
7	February		37,424	38,728		
8	March		36,856	30,640		
9	April		33,901	22,041		
10	May		27,562	12,890		
11	June		22,147	7,287		
12	July		15,939	7,073		
13	August		10,852	9,481		
14	September, 2025		7,537	7,657		
15	Total	Sum L 2 to L 14	247,220			
16	Number of Months	13				
17	Average Acct Rec Balance	L 15 / L 16	$19,017			
18	Total Sales for Year	Sum L 2 to L 14		$ 239,740		
19	Acct Rec Turnover Ratio	L 18 / L 17			12.61	
20	Collection Lag Day Factor	L 1 / L 19				28.95
21	Meter Read Lag Factor					3
22	Service Lag	365 / 12 / 2				15.21
23	Total Revenue Lag Days	Sum L 20 to L 22				**47.16**

Summary of Expense Lag Calculations

Line No.	Description	[1] Reference Or Factor	[2] Amount	[3] (Lead) / Lag Days	[4] Weighted Average [2] * [3]	[5] (Lead) / Lag Days [4] / [2]
PAYROLL						
1	Hourly	Exhibit ATF-4	$ 17,291	14.00	$ 242,068	
2	Part time/ seasonal		34	14.00	$ 476	
3	Supervisory		15,972	6.73	$ 107,492	
4	Executive		1,803	6.85	$ 12,347	
5			$ 35,099		$ 362,384	10.32
PURCHASE GAS COSTS						
6	Payment Lag	Page 8	$ 113,769		$ 4,531,618	
7	Gas Cost Lag Days	L6, C 4 / C 2				39.83
OTHER O & M EXPENSES						
8	October 2024	Exhibit ATF-1, Schedule 1	$ 2,131	38.42	$ 81,876	
9	November 2024		2,090	37.99	$ 79,380	
10	December 2024		3,027	55.76	$ 168,799	
11	January 2025		2,126	43.07	$ 91,563	
12	February 2025		2,471	50.20	$ 124,027	
13	March 2025		2,682	38.33	$ 102,785	
14	April 2025		3,293	34.88	$ 114,846	
15	May 2025		2,767	33.64	$ 93,091	
16	June 2025		3,098	37.72	$ 116,847	
17	July 2025		2,505	38.60	$ 96,711	
18	August 2025		2,278	41.23	$ 93,914	
19	September 2025		2,677	42.37	$ 113,417	
20	TOTAL		$ 31,144		$ 1,277,254	
21	Other O&M Expense Lag Days	L20, C 4 / C 2				41.01

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
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Purchase Gas Cost Payment Lag Summary
(In thousands)

Line #	Accounting Month	[1] Due Date	[2] Mid-Point	[3] Days Lag	[4] Total Gas Purchased	[5] Weighted Average
		WP-03			WP-03	
1	October 2024	11/25/2024	10/16/2024	40.0	2,811	112,453
2	October 2024	11/22/2024	10/16/2024	37.0	297	10,998
3	October 2024	11/25/2024	10/16/2024	40.0	3,708	148,307
4	October 2024	11/22/2024	10/16/2024	37.0	326	12,044
5	October 2024	11/20/2024	10/16/2024	35.0	79	2,768
6	October 2024 Total				7,221	286,570
7	November 2024	12/26/2024	11/15/2024	40.5	2,905	117,638
8	November 2024	12/23/2024	11/15/2024	37.5	296	11,084
9	November 2024	12/26/2024	11/15/2024	40.5	3,731	151,114
10	November 2024	12/23/2024	11/15/2024	37.5	312	11,710
11	November 2024	12/20/2024	11/15/2024	34.5	76	2,618
12	November 2024 Total				7,320	294,163
13	December 2024	1/27/2025	12/16/2024	42.0	6,124	257,211
14	December 2024	1/23/2025	12/16/2024	38.0	298	11,334
15	December 2024	1/27/2025	12/16/2024	42.0	3,759	157,866
16	December 2024	1/23/2025	12/16/2024	38.0	330	12,553
17	December 2024	1/21/2025	12/16/2024	36.0	78	2,818
18	December 2024 Total				10,590	441,782
19	January 2025	2/25/2025	1/16/2025	40.0	10,554	422,149
20	January 2025	2/24/2025	1/16/2025	39.0	303	11,798
21	January 2025	2/25/2025	1/16/2025	40.0	3,823	152,906
22	January 2025	2/24/2025	1/16/2025	39.0	344	13,400
23	January 2025	2/20/2025	1/16/2025	35.0	79	2,782
24	January 2025 Total				15,102	603,034
25	February 2025	3/25/2025	2/14/2025	38.5	9,147	352,143
26	February 2025	3/24/2025	2/14/2025	37.5	299	11,203
27	February 2025	3/25/2025	2/14/2025	38.5	3,756	144,603
28	February 2025	3/24/2025	2/14/2025	37.5	336	12,584
29	February 2025	3/20/2025	2/14/2025	33.5	76	2,559
30	February 2025 Total				13,613	523,092
31	March 2025	4/25/2025	3/16/2025	40.0	5,333	213,305
32	March 2025	4/21/2025	3/16/2025	36.0	294	10,595
33	March 2025	4/21/2025	3/16/2025	36.0	3,706	133,424
34	March 2025	4/25/2025	3/16/2025	40.0	320	12,786
35	March 2025	4/21/2025	3/16/2025	36.0	76	2,731
36	March 2025 Total				9,729	372,842
37	April 2025	5/27/2025	4/15/2025	41.5	6,057	251,370
38	April 2025	5/22/2025	4/15/2025	36.5	429	15,659
39	April 2025	5/27/2025	4/15/2025	41.5	3,797	157,563
40	April 2025	5/22/2025	4/15/2025	36.5	318	11,613
41	April 2025	5/20/2025	4/15/2025	34.5	77	2,670
42	April 2025 Total				10,678	438,875
43	May 2025	6/25/2025	5/16/2025	40.0	4,092	163,694
44	May 2025	6/23/2025	5/16/2025	38.0	430	16,336
45	May 2025	6/25/2025	5/16/2025	40.0	3,805	152,183
46	May 2025	6/23/2025	5/16/2025	38.0	286	10,872
47	May 2025	6/20/2025	5/16/2025	35.0	78	2,720
48	May 2025 Total				8,691	345,807
49	June 2025	7/25/2025	6/15/2025	39.5	3,511	138,666
50	June 2025	7/21/2025	6/15/2025	35.5	255	9,040
51	June 2025	7/25/2025	6/15/2025	39.5	3,808	150,427
52	June 2025	7/21/2025	6/15/2025	35.5	274	9,716
53	June 2025	7/21/2025	6/15/2025	35.5	77	2,747
54	June 2025 Total				7,925	310,596
55	July 2025	8/25/2025	7/16/2025	39.5	3,476	137,319
56	July 2025	8/22/2025	7/16/2025	36.5	255	9,299
57	July 2025	8/25/2025	7/16/2025	39.5	3,807	150,378
58	July 2025	8/22/2025	7/16/2025	36.5	266	9,703
59	July 2025	8/20/2025	7/16/2025	34.5	75	2,588
60	July 2025 Total				7,879	309,287
61	August 2025	9/25/2025	8/16/2025	40.0	3,185	127,382
62	August 2025	9/22/2025	8/16/2025	37.0	256	9,465
63	August 2025	9/25/2025	8/16/2025	40.0	3,808	152,335
64	August 2025	9/22/2025	8/16/2025	37.0	312	11,548
65	August 2025	9/22/2025	8/16/2025	37.0	78	2,882
66	August 2025 Total				7,639	303,612
67	September 2025	10/27/2025	9/15/2025	41.5	2,916	121,007
68	September 2025	10/20/2025	9/15/2025	34.5	254	8,778
69	September 2025	10/27/2025	9/15/2025	41.5	3,830	158,927
70	September 2025	10/20/2025	9/15/2025	34.5	307	10,602
71	September 2025	10/20/2025	9/15/2025	34.5	77	2,644
72	September 2025 Total				7,384	301,958
73	Total				113,769	4,531,618
74	Total Lag Days					**39.83**

Interest Payments

Line No.	Description	[1] Reference Or Factor	[2] # of Days	[3] # of Days	[4] Total
1	Rate Base at September 30, 2025	Sch C-1			$ 464,206
2	Long-term Debt Ratio	Sch B-7			43.90%
3	Embedded Cost of Long-term Debt	Sch B-7			5.36%
4	Pro forma Interest Expense	L 1 * L 2 * L 3			$ 10,931
5	Daily Amount	L 4 / L 5 [2]	365		$ 30
6	Days to mid-point of interest payments	Line 5/ 4		91.25	
7	Less: Revenue Lag Days	Page 3		47.16	
8	Interest Payment lag days	L 7 - L 6			(44.1)
9	Total Interest for Working Capital	L 5 * L 8			$ (1,320)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025

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Tax Lag Day Calculations

Line #	Description	[1] Payment Dates	[2] Mid-Point of Service Period	[3] Lead (Lag) Payment Days [1] - [2]	[4] Payment Amount	[5] Weighted Lead (Lag) Average [3] * [4]	[6] Payment Lead (Lag) Days [5] / [4]	[7] Revenue (Lag) Days	[8] Net Payment Lead (Lag) Days [6] - [7]	[9] Total Dollar Days	[10] Working Capital Amount
											365
Schedule D-11	**FEDERAL AND STATE INCOME TAXES**										
1	4th Quarter Estimate	9/15/2024	4/1/2024	(167.00)	$ 1,039	$ (173,555)					
2	1st Quarter Estimate	1/15/2025	4/1/2025	76.00	$ 1,039	$ 78,983					
3	2nd Quarter Estimate	3/15/2025	4/1/2025	17.00	$ 1,039	$ 17,667					
4	3rd Quarter Estimate	6/15/2025	4/1/2025	(75.00)	$ 1,039	$ (77,944)					
5	Total				$ 4,157	$ (154,848)	$ (37)	(47.16)	$ 10	$ 41,196	$ 113
WP-05	**PA PROPERTY TAX**										
6	First Payment	03/11/25	12/30/25	294.00	13	3,873					
7	Second Payment	04/05/25	12/30/25	269.00	26	7,068					
8	Third Payment	08/03/25	12/30/25	149.00	18	2,740					
9	Fourth Payment	09/08/25	12/30/25	113.00	26	2,897					
11	Total PA Property				$ 83	16,577	198.60	(47.16)	245.76	$ 20,514	$ 56
WP-06	**PURTA**										
12	CY 2024 Purta Tax	10/15/24	07/02/24	(105.00)	8	(875)					
13	CY 2024 Purta Tax	11/15/24	07/02/24	(136.00)	8	(1,133)					
14	CY 2024 Purta Tax	12/15/24	07/02/24	(166.00)	8	(1,383)					
15	CY 2025 Purta Tax	01/15/25	07/02/25	168.00	8	1,400					
16	CY 2025 Purta Tax	02/15/25	07/02/25	137.00	8	1,142					
17	CY 2025 Purta Tax	03/15/25	07/02/25	109.00	8	908					
18	CY 2025 Purta Tax	04/15/25	07/02/25	78.00	8	650					
19	CY 2025 Purta Tax	05/15/25	07/02/25	48.00	11	520					
20	CY 2025 Purta Tax	06/15/25	07/02/25	17.00	11	184					
21	CY 2025 Purta Tax	07/15/25	07/02/25	(13.00)	11	(141)					
22	CY 2025 Purta Tax	08/15/25	07/02/25	(44.00)	11	(477)					
23	CY 2025 Purta Tax	09/15/25	07/02/25	(75.00)	11	(813)					
24	Total PURTA				$ 113	(18)	(0.16)	(47.16)	47.00	$ 5,288	$ 14.5
25	Total Working Capital For Other Taxes										$ 184

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
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Prepaid Expenses (in thousands)

Line #	Description	[1]	[2] TOTAL	[3] Insurance WP-07	[4] PUC Assessment WP-07	[5] AGA Dues WP-07	[6] IT Services WP-07
1	September, 2024		1,370	553	746	(0)	71
2	October		1,223	472	666	23	62
3	November		1,044	393	586	12	53
4	December		863	312	507	(0)	44
5	January, 2025		684	235	427	(13)	35
6	February		539	153	347	13	27
7	March		351	67	267	(0)	18
8	April		221	0	187	25	9
9	May		1,089	969	107	13	0
10	June		1,022	898	27	(0)	98
11	July		842	811	(53)	(13)	96
12	August		641	712	(133)	(25)	87
13	September, 2025		1,427	619	731	(0)	77
14	TOTAL		$ 11,316	$ 6,193	$ 4,412	$ 34	$ 676
15	Percent to Gas			100.00%	100.00%	100.00%	100.00%
16	Amount to Gas			$ 6,193	$ 4,412	$ 34	$ 676
17	Monthly Average	13		$ 476	$ 339	$ 3	$ 52
18	Rate Case Amount		$ 870				

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Gas Inventory

Line No.	Description	[1] WP-08 Stored Underground
1	September, 2024	$ 10,765
2	October	$ 15,059
3	November	$ 10,890
4	December	$ 5,626
5	January, 2025	$ 3,663
6	February	$ 2,496
7	March	$ 1,873
8	April	$ 2,155
9	May	$ 2,940
10	June	$ 3,824
11	July	$ 4,591
12	August	$ 5,343
13	September, 2025	$ 9,814
14	Total	$ 79,038
15	12 month Modified Average Balance	$ 5,729

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Accumulated Deferred Income Taxes

Line #	Description		[1] Amount	[2] Total
	Accumulated Deferred Income Tax			
1	Gas Utility Plant - a/c #282	Exhibit EF-1	(76,126)	
2	Federal ADIT			(76,126)
3	Pro-Rata Adjustment			
4	Balance At September 30, 2025			$ (76,126.282)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Customer Deposits

Line #	Description	[1] WP-07 Balance At End Of Month
1	September, 2024	$ 5,160
2	October	$ 5,198
3	November	$ 5,126
4	December	$ 5,194
5	January, 2025	$ 5,170
6	February	$ 5,135
7	March	$ 5,114
8	April	$ 5,135
9	May	$ 5,166
10	June	$ 5,156
11	July	$ 5,133
12	August	$ 5,137
13	September, 2025	$ 5,144
14	Total	$ 66,970
15	Number of Months	13
16	Average Monthly Balance	$ 5,152

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
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($ in Thousands)

Materials & Supplies

Line #	Month	[1] WP-07 Materials & Supplies
1	September, 2024	$ 1,461
2	October	1,490
3	November	1,499
4	December	1,509
5	January, 2025	1,523
6	February	1,410
7	March	1,491
8	April	1,506
9	May	1,586
10	June	1,639
11	July	1,705
12	August	1,677
13	September, 2025	1,668
14	Total	$ 20,162
15	Number of Months	13
16	Average Monthly Balance	$ 1,551

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
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($ in Thousands)

Summary of Revenue and Expenses
Pro Forma with Proposed Revenue Increase

Line #	Description	Factor Or Reference	[1] Pro Forma Test Year At Present Rates	[2] Pro Forma Test Year Rate Increase	[3] Pro Forma Test Year At Proposed Rates
	OPERATING REVENUES				
1	Customer & Distribution Revenue		$ 136,057	$ -	$ 136,057
2	Gas Supply & Cost Adjustment Revenue		102,219	-	102,219
3	Other Revenues		1,463	-	1,463
4	Revenue Increase			1,991	1,991
5	Total operating revenues		239,739	1,991	241,730
	OPERATING EXPENSES				
6	Manufactured Gas		26	-	26
7	Gas Supply Production		48,549	-	48,549
8	Transmission		54,751		54,751
9	Distribution		22,491	-	22,491
10	Customer Accounts		10,095	-	10,095
11	Uncollectible Expense	1.530%	3,462	30	3,492
12	Customer Information & Services		4,208	-	4,208
13	Sales		4	-	4
14	Administrative & General		30,739	-	30,739
15	Depreciation & Amortization		21,641	-	21,641
16	Taxes other than income taxes		2,185	-	2,185
17	Total operating expenses		198,151	30	198,181
18	Net operating income Before Income Tax		41,588	1,961	43,549
	Income Taxes				
19	Pro Forma Income Tax At Present Rates		2,805		2,805
20	Pro Forma Income Tax on Revenue Increase			543	543
21	Net Income (loss)		$ 38,783	$ 1,417	$ 40,200

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Summary of Pro Forma Revenue and Expense Adjustments with Proposed Revenue Increase

Line #	Description	[1] Factor Or Reference	[2] Test Year At Present Rates Per Book 09/30/25	[3] Adjustments Sch D-3 Increase (Decrease)	[4] Pro Forma Adjusted For Test Year 9/30/25 [2] + [3]	[5] Proposed Increase	[6] Pro Forma Test Year With Proposed Increase [4] + [5]
	OPERATING REVENUES						
1	Residential	480	$ 163,839	$ -	$ 163,839		$ 163,839
2	Comm/PA	481	27,222	$ -	27,222		27,222
3	Industrical	481	2,054	$ -	2,054		2,054
4	Transportation	489	45,161	$ -	45,161		45,161
5	Forfeited Discounts		1,146	-	1,146		1,146
6	Miscellaneous Service Revenues		217	-	217		217
7	Rent from Gas Properties		100	-	100		100
8	Rate Increase			-	-	1,991	1,991
9	Total operating revenues		239,739	-	239,739	1,991	241,730
	OPERATING EXPENSES						
10	Gas Production		26	-	26		26
11	Gas Supply Production		48,549	-	48,549		48,549
12	Transmission		54,751		54,751		54,751
13	Distribution		22,491	-	22,491		22,491
14	Customer Accounts		10,095	-	10,095		10,095
15	Uncollectible Expense	1.530%	4,376	(914)	3,462	30	3,492
16	Customer Information & Services		4,208	-	4,208		4,208
17	Sales		4	-	4		4
18	Administrative & General		28,726	2,013	30,739		30,739
19	Depreciation & Amortization		19,245	2,396	21,641		21,641
20	Taxes other than income taxes		2,151	34	2,185		2,185
21	Total operating expenses		194,622	3,529	198,151	30	198,181
22	Net Operating Income - BIT		$ 45,117	$ (3,529)	$ 41,588	$ 1,961	$ 43,549

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Summary of Pro Forma Adjustments

Line #	Description		[1] Per Books	[2] OPEB	[3] CAP	[4] Salary Annualization	[5] Rate Case	[6] Uncollectibles Expense	[7] Sub-Total Adjustments	[8] Total Proforma
	OPERATING REVENUES			D-4		Formato	D-6	D-7		
	Customer & Distribution Revenue									
1	Residential	480	$ 82,802		$ -				$ -	$ 82,802
2	Comm/PA	481	11,424		-				-	11,424
3	Industrical	481	715		-				-	715
4	Transportation	489	41,115		-				-	41,115
	Revenue for Cost of Gas								-	-
5	Residential	480	81,037		-				-	81,037
6	Comm/PA	481	15,798		-				-	15,798
7	Industrical	481	1,339		-				-	1,339
8	Transportation	489	4,046		-				-	4,046
9	Forfeited Discounts		1,146		-				-	1,146
10	Miscellaneous Service Revenues		217		-				-	217
11	Rent from Gas Properties		100		-				-	100
12			-						-	-
13	Total operating revenues		239,739		-	-	-	-	-	239,739
	OPERATING EXPENSES									-
14	Gas Production		26						-	26
15	Gas Supply Production		48,549						-	48,549
16	Transmission		54,751							54,751
17	Distribution		22,491	-					-	22,491
18	Customer Accounts		10,095						-	10,095
19	Uncollectible Expense		4,376		(914)				(914)	3,462
20	Customer Information & Services		4,208						-	4,208
21	Sales		4						-	4
22	Administrative & General		28,726	1,559		454	-		2,013	30,739
23	Depreciation & Amortization		19,245						-	19,245
24	Taxes other than income taxes		2,151						-	2,151
									-	-
25	Total operating expenses		$ 194,622	$ 1,559	$ (914)	$ 454	$ -	$ -	$ 1,099	$ 195,721
26	Net operating income Before Income Tax		$ 45,117	$ (1,559)	$ 914	$ (454)	$ -	$ -	$ (1,099)	$ 44,018

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Summary of Pro Forma Adjustments

Line #	Description	[1] From Page 1 Sub-total	[2] Other	[3] Other	[4] Other	[5] Other	[10] Depreciation D-8	[11] Taxes Other Than Income D-10	[12] Reserved	[13] TOTAL Adjusted
	OPERATING REVENUES									
27	**Customer & Distribution Revenue**									
28	Residential	$ 82,802								$ 82,802
29	Comm/PA	11,424								11,424
30	Industrical	715								715
31	Transportation	41,115								41,115
	Revenue for Cost of Gas									-
32	Residential	81,037								81,037
33	Comm/PA	15,798								15,798
34	Industrical	1,339								1,339
35	Transportation	4,046								4,046
36	Forfeited Discounts	1,146								1,146
37	Miscellaneous Service Revenues	217								217
38	Rent from Gas Properties	100								100
39	-	-								-
40	Total operating revenues	239,739	-	-	-	-	-	-	-	239,739
	OPERATING EXPENSES									
41	Gas Production	26								26
42	Gas Supply Production	48,549								48,549
43	Transmission	54,751								54,751
44	Distribution	22,491								22,491
45	Customer Accounts	10,095								10,095
46	Uncollectible Expense	3,462								3,462
47	Customer Information & Services	4,208								4,208
48	Sales	4								4
49	Administrative & General	30,739								30,739
50	Depreciation & Amortization	19,245					2,396			21,641
51	Taxes other than income taxes	2,151						34		2,185
52	Total operating expenses	$ 195,721	$ -	$ -	$ -	$ -	$ 2,396	$ 34	$ -	$ 198,151
53	Net operating income Before Income Tax	$ 44,018	$ -	$ -	$ -	$ -	$ (2,396)	$ (34)	$ -	$ 41,588

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Adjustment - Negative FAS 106 Expense

Line #	Description	[1] Amount	[2] Total
1	SFAS 106 Expense Oct 24 - Sept 25	$ 1,559	
4	Total ProForma Adjustment		$ 1,559

Schedule: D-5
Witness: C. Mann
Page: 1 of 1

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Adjustment - Revenue Adjustments

Line #	Description	Reference Or Account Number	[1] 09/30/25	[2] PRO FORMA ADJUSTMENTS Other Adjustments	[3] Rev/PGC Adj Annualization	[4] Total Proforma Adjustments D-5A	[5] Proforma Adjusted At Present Rates
	Customer & Distribution Revenue						
1	Residential	480	$ 82,802			$ -	$ 82,802
2	Comm/PA	481	11,424			-	11,424
3	Industrical	481	715			-	715
4	Transportation	489	41,115			-	41,115
5	Cust Chg & Distrib Revenue		136,057	-	-	-	136,057
	Revenue for Cost of Gas						
6	Residential	480	81,037			-	81,037
7	Comm/PA	481	15,798			-	15,798
8	Industrical	481	1,339			-	1,339
9	Transportation	489	4,046	-		-	4,046
10	Revenue for Cost of Gas		102,219	-	-	-	102,219
							-
11	Total Customer Revenue		238,276	-	-	-	238,276
12	Forfeited Discounts	487	1,146			-	1,146
13	Miscellaneous Service Revenues	488	-			-	-
							-
14	Rent from Gas Properties	493	100			-	100
15	Other Revenues	495	217			-	217
16	TOTAL REVENUES		$ 239,739	$ -	$ -	$ -	$ 239,739

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Adjustment - Rate Case Expense

KEEP BLANK

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Adjustment - Uncollectibles

Line #	Description	[1] Reference Or Factor	[2] Adj Net Write-Offs	[3] Adj Gross Revenue	[4] Percent [2] / [3]	[5] Total [2] / [3]
Calculation of Uncollectible Percentage (HTY)						
1	12 Months ended September 2022		$ 2,851	$ 199,458	1.43%	
2	12 Months ended September 2023		$ 3,340	$ 216,182	1.55%	
3	12 Months ended September 2024		$ 4,312	$ 270,623	1.59%	
4	Three Year Average	3	$ 3,501	$ 228,754		1.53%
	Sum (Line 1 to Line 3) / 3					
	Management Adj.					0.02%
	Uncollectible Factor					1.55%

Adjustment #1:

5	Per Book TME September 30, 2025	ATF-1	$ 4,619
6	Reclass MFC		$ (243)
7	CAP Arrearage - Move to Rider F		$ (914)
8	Total Normalized Uncollectible Expense	L5 + L7	$ 3,462

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Adjustment - Depreciation expense

Line #	Description	[1] Account Number	[2] 9/30/25 Depreciation Expense	[3] Adjustment To Annualize At New Depre Study Rates	[4] Pro Forma Test Year Depreciation
INTANGIBLE PLANT					
1	Organization	301	$ 2,147	$ -	$ 2,147
2	Franchise & Consent	302	-	-	-
3	Miscellaneous Intangible Plant	303		-	-
4	TOTAL INTANGIBLE		2,147	-	2,147
PRODUCTION PLANT					
5	Rights of Way	325.4	0.4	-	0
6	Other Land Rights	325.5	-	-	-
7	Field Measuring & Regulating Station Structures	328	0.0	-	0
8	Other Structures	329	0.1	-	0
9	Field Lines	332	12	-	12
10	Field Measuring & Reg. Station Equipment	334	83		83
			-	-	-
11	TOTAL PRODUCTION PLANT		95	-	95

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Adjustment - Depreciation expense

Line #	Description	[1] Account Number	[2] Per Book 9/30/2025	[3] Adjustment To Annualize At New Depre Study Rates	[4] Pro Forma Test Year Depreciation
TRANSMISSION PLANT					
12	Land & Land Rights	365.1	2	-	2
13	Rights of Way	365.2	27		27
14	Measuring & Regulating Station Structures	366.2	4		4
15	Mains	367	1,161		1,161
16	Measuring & Regulating Station Equipment	369	153		153
17	TOTAL TRANSMISSION		1,348	-	1,348
DISTRIBUTION PLANT					
18	Land & Land Rights	374	189	-	189
19	Structures & Improvements	375	452		452
20	Mains	376	7,528		7,528
21	Measuring & Regulating Station Equipment	378	372		372
22	Services	380	4,711		4,711
23	Meters	381	413		413
24	Meter Installations	382	49		49
25	House Regulatory Installations	384	19		19
26	Industrial Measuring & Reg. Station Equipment	385	311		311
27	Other Property	386	-		-
28	TOTAL DISTRIBUTION		14,044	-	14,044
GENERAL PLANT					
29	Land & Land Rights	389	-	-	-
30	Structures & Improvements	390	4		4
31	Office Furniture & Equipment	391	998		998
32	Transportation Equipment	392	1,585		1,585
33	Tools & Garage Equipment	394	288		288
34	Power Operated Equipment	396	819		819
35	Communication Equipment	397	322		322
36	Other Tangible Property	399	-	-	-
37	TOTAL GENERAL		4,016	-	4,016
38	TOTAL DEPRECIATION		$ 21,649	$ -	$ 21,649
39	CHARGED TO CLEARING ACCOUNTS	Reclassed from O&M	$ (2,404)	$ -	$ (2,404)
40	NET SALVAGE AMORTIZATION	C-3, page 4	$ 1,657	$ (8)	$ 1,649

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Adjustment - Taxes Other Than Income Taxes

Line #	Description	[1] Account Number	[2] Factor or Reference	[3] 9/30/25	[4] Pro Forma Adjustments	[5] Pro Forma Tax Expense 9/30/25
1	Property	408.1		$ 84	$ -	$ 84
2	Social Security	408.1		1,953	31	1,983
3	PURTA	408.1		113	-	113
4	FUTA	408.1	D-10	11	(0)	11
5	SUTA	408.1	D-10	99	3	102
6	OTHER	408.1	D-10	(107)	-	(107)
7	Total			$ 2,151	$ 34	$ 2,185

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Adjustment - Payroll Taxes

Line #	Description	[1] Reference or Factor	[2] 9/30/25 Present Rates	[3] Pro Forma Adjustments	[4] Increase in Payroll Taxes
1	Total Payroll Charged to Expense		$ 34,569	$ 35,099	
2	FICA Expense	D-9	1,953	1,983	31
3	FICA Expense - Percent	L 2 / L 1	5.65%	5.65%	
4	Pro Forma FICA Expense on Pro Forma S&W				$ 31
5	FUTA Expense	D-9	11	11	(0)
6	FUTA Expense - Percent	L 5 / L 1	0.03%	0.03%	
7	Pro Forma FUTA Expense on Pro Forma S&W				$ (0)
8	SUTA Expense	D-9	99	102	3
9	SUTA Expense - Percent	L 8 / L 1	0.29%	0.29%	
10	Pro Forma SUTA Expense on Pro Forma S&W				$ 3
11	Pro Forma Adjustment	Sum L 4, L 7, L 10			$ 34

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)
Income Tax Calculation

Line #	Description	[1] Factor Or Reference	[2] Element Or Amount	[3] Pro Forma Test Year At Present Rates	[4] Revenue Increase	[5] Pro Forma Test Year At Proposed Rates [3] + [4]
1	Revenue			$ 239,739	$ 1,991	$ 241,730
2	Operating Expenses			(198,151)	(30)	(198,181)
3	OIBIT	L1 + L2		41,588	1,961	43,549
	Interest Expense					
4	Rate Base	Sch A-1	464,206			
5	Weighted Cost of Debt	Sch B-7	0.02350			
6	Synchronized Interest Expense	L4 * L5		(10,909)	-	(10,909)
7	Base Taxable Income/(Loss)	L3 + L6		30,679	1,961	32,640
8	Total State Tax Depreciation	Sch D-12	$ 18,119			
9	Pro Forma Book Depreciation	Sch D-12	21,649			
10	State Tax Depreciation (Over) Under Book	L8 + L9		3,530		3,530
11	Other	EF-2		(25,576)	-	(25,576)
12	State Taxable Income/(Loss)	Sum L7 to L11		$ 8,633	$ 1,961	$ 10,594
13	State Income Tax (Expense)/Benefit	-L12 * Rate State	8.49%	$ (733)	$ (166)	$ (899)
14	Total Federal Tax Depreciation	Sch D-12	$ 12,299			
15	Pro Forma Book Depreciation	Sch D-12	21,649			
16	Federal Tax Deducts (Over) Under Book	L15 - L14		9,350	-	9,350
17	Other	EF-2		(25,576)	-	(25,576)
18	Federal Taxable Income/(Loss)	L 7 + Sum L13 to L17		13,720	1,794	15,514
19	Federal Income Tax (Expense)/Benefit	-L18 * Rate Fed	21.00%	(2,881)	(377)	(3,258)
20	Total Current Income Tax (Expense)/Benefit	L13 + L19		(3,614)	(543)	(4,157)
	Deferred Federal Income Taxes					
21	Federal Tax Deducts (Over) Under Book	L16	$ 9,350			
22	Adjust for Book Flow Through Depreciation	EF-2	6,401			
23	Net Temporary Difference Depreciation	L22 - L21		(2,949)		(2,949)
24	Other Deferred Adjustments	EF-2		(1,784)		(1,784)
25	Federal Temporary Differences	L23 + L24		(4,733)	-	(4,733)
26	Deferred Federal Taxable Income/(Loss)	L25		$ (4,733)	$ -	$ (4,733)
27	Deferred Federal Income Tax (Expense)/Benefit	-L26 * Rate Fed	21.00%	994	-	994
	Deferred State Income Taxes					
28	PA 2009 Repairs Section 481(a) Amortization	Stmt No. 12		272		272
						-
29	State Deferred Income Tax (Expense)/Benefit			272	-	272
30	Net Income Tax (Expense)/Benefit	L20 + L27 + L29		(2,348)	(543)	(2,891)
	Other Tax Adjustments					
31	PA 2009 Repairs Section 481(a) Amortization - Federal Benefit	Stmt No. 12		(57)		(57)
32	Medicare Subsidy Amortization	Stmt No. 12		(416)		(416)
33	ARAM	Stmt No. 12		1,049		1,049
34	Unprotected	Stmt No. 12		(1,033)		(1,033)
35	Combined Income Tax (Expense)/Benefit	Sum L30 to L34		$ (2,805)	$ (543)	$ (3,348)
36	Federal Income Tax (Expense)/Benefit	L19 + L27 + Sum L31 to L34		$ (2,344)	$ (377)	$ (2,721)
37	State Income Tax (Expense)/Benefit	L13 + L29		(461)	(166)	(627)
38	Total Income Tax (Expense)/Benefit	L36 + L37		$ (2,805)	$ (543)	$ (3,348)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Tax Depreciation

Line #	Description	[1] Amount	[2] Amount	[3] Total
	Accelerated Tax Depreciation			
1	Gas Plant		$ 10,650	
2	Net Salvage Amortization		1,649	
3	Total Federal Accelerated Tax Depreciation			$ 12,299
4	Adjustment for PA Tax Depreciation		5,820	
5	Total State Accelerated Tax Depreciation			$18,119
	Book Depreciation			
6	Pro Forma Book Depreciation		$ 20,001	
7	Net Salvage Amortization		1,649	
8	Book Depreciation for Tax Calculation			$ 21,649

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Gross Revenue Conversion Factor

Line #	Description	[1] Reference Or Factor	[2] Tax Rate	[3] Factor
GROSS REVENUE CONVERSION FACTOR				
1	GROSS REVENUE FACTOR			1.000000
2	UNCOLLECTIBLE EXPENSES			(0.015300)
3	NET REVENUES	Sum L 1 to L 2		0.984700
4	STATE INCOME TAXES	[3] L 3 * Rate [2]	8.49%	(0.083601)
5	FACTOR AFTER STATE TAXES	L 3 + L 4		0.901099
6	FEDERAL INCOME TAXES	[3] L 5 * Rate [2]	21.00%	(0.189231)
7	NET OPERATING INCOME FACTOR	L 5 + L 6		0.711868
8	GROSS REVENUE CONVERSION FACTOR	1 / L 7		1.404755
9	Combined Income Tax Factor On Gross Revenues	-L 4 - L 6		27.283%
INCOME TAX FACTOR				
10	GROSS REVENUE FACTOR			1.000000
11	STATE INCOME TAXES	[3] L 10 * Rate [2]	8.4900%	(0.084900)
12	FACTOR AFTER STATE TAXES	L 10 + L 11		0.915100
13	FEDERAL INCOME TAXES	[3] L 12 * Rate [2]	21.00%	(0.192171)
14	NET OPERATING INCOME FACTOR	L 12 + L 13		0.722929
15	GROSS REVENUE CONVERSION FACTOR	1 / L 14		1.383262
16	Combined Income Tax Factor On Taxable Income	-L 11 - L 13		27.707%

NATIONAL FUEL EXHIBIT B

RATE OF RETURN

NATIONAL FUEL EXHIBIT JCN-2

SUMMARY OF RESULTS

Company	Ticker	*Primary Analyses*															Average of DCF, CAPM, and Risk Premium
		CONSTANT GROWTH DCF				**CAPM**							**Risk Premium (Average)**				
						Value Line Beta			Bloomberg Beta								
		30-Day Average	90-Day Average	180-Day Average	***Average***	Current Yield	Near-Term Projected Yield	Long-Term Projected Yield	Current Yield	Near-Term Projected Yield	Long-Term Projected Yield	***Average***	Current Yield	Near-Term Projected Yield	Long-Term Projected Yield	***Average***	
Atmos Energy Corporation	ATO	10.37%	10.46%	10.57%	**10.47%**	11.18%	11.17%	11.17%	10.89%	10.87%	10.87%	**11.02%**	10.41%	10.39%	10.39%	**10.40%**	**10.63%**
New Jersey Resources Corporation	NJR	11.46%	11.43%	11.41%	**11.43%**	11.18%	11.17%	11.17%	11.19%	11.18%	11.18%	**11.18%**	10.41%	10.39%	10.39%	**10.40%**	**11.00%**
NiSource Inc.	NI	10.64%	10.68%	10.79%	**10.70%**	12.05%	12.04%	12.04%	11.31%	11.29%	11.29%	**11.67%**	10.41%	10.39%	10.39%	**10.40%**	**10.92%**
Northwest Natural Holding Co.	NWN	10.29%	10.63%	10.76%	**10.56%**	11.18%	11.17%	11.17%	10.51%	10.49%	10.49%	**10.83%**	10.41%	10.39%	10.39%	**10.40%**	**10.60%**
ONE Gas Inc.	OGS	9.15%	9.31%	9.39%	**9.29%**	11.18%	11.17%	11.17%	11.00%	10.99%	10.99%	**11.08%**	10.41%	10.39%	10.39%	**10.40%**	**10.25%**
Southwest Gas Holdings, Inc.	SWX	16.60%	16.66%	16.79%	**16.69%**	11.18%	11.17%	11.17%	11.62%	11.61%	11.61%	**11.39%**	10.41%	10.39%	10.39%	**10.40%**	**12.82%**
Spire, Inc.	SR	11.70%	12.00%	12.15%	**11.95%**	11.18%	11.17%	11.17%	11.09%	11.08%	11.08%	**11.13%**	10.41%	10.39%	10.39%	**10.40%**	**11.16%**
Low		9.15%	9.31%	9.39%	**9.29%**	11.18%	11.17%	11.17%	10.51%	10.49%	10.49%	**10.83%**					**10.25%**
Median		10.64%	10.68%	10.79%	**10.70%**	11.18%	11.17%	11.17%	11.09%	11.08%	11.08%	**11.13%**	10.41%	10.39%	10.39%	**10.40%**	**10.92%**
Mean		11.46%	11.60%	11.69%	**11.58%**	11.30%	11.29%	11.29%	11.09%	11.07%	11.07%	**11.19%**	10.41%	10.39%	10.39%	**10.40%**	**11.06%**
High		16.60%	16.66%	16.79%	**16.69%**	12.05%	12.04%	12.04%	11.62%	11.61%	11.61%	**11.67%**					**12.82%**

SUMMARY OF RESULTS - EXCLUDING SPIRE INC.

Company	Ticker	*Primary Analyses*															Average of DCF, CAPM, and Risk Premium
		CONSTANT GROWTH DCF				**CAPM**							**Risk Premium (Average)**				
						Value Line Beta			Bloomberg Beta								
		30-Day Average	90-Day Average	180-Day Average	***Average***	Current Yield	Near-Term Projected Yield	Long-Term Projected Yield	Current Yield	Near-Term Projected Yield	Long-Term Projected Yield	***Average***	Current Yield	Near-Term Projected Yield	Long-Term Projected Yield	***Average***	
Atmos Energy Corporation	ATO	10.37%	10.46%	10.57%	**10.47%**	11.18%	11.17%	11.17%	10.89%	10.87%	10.87%	**11.02%**	10.41%	10.39%	10.39%	**10.40%**	**10.63%**
New Jersey Resources Corporation	NJR	11.46%	11.43%	11.41%	**11.43%**	11.18%	11.17%	11.17%	11.19%	11.18%	11.18%	**11.18%**	10.41%	10.39%	10.39%	**10.40%**	**11.00%**
NiSource Inc.	NI	10.64%	10.68%	10.79%	**10.70%**	12.05%	12.04%	12.04%	11.31%	11.29%	11.29%	**11.67%**	10.41%	10.39%	10.39%	**10.40%**	**10.92%**
Northwest Natural Holding Co.	NWN	10.29%	10.63%	10.76%	**10.56%**	11.18%	11.17%	11.17%	10.51%	10.49%	10.49%	**10.83%**	10.41%	10.39%	10.39%	**10.40%**	**10.60%**
ONE Gas Inc.	OGS	9.15%	9.31%	9.39%	**9.29%**	11.18%	11.17%	11.17%	11.00%	10.99%	10.99%	**11.08%**	10.41%	10.39%	10.39%	**10.40%**	**10.25%**
Southwest Gas Holdings, Inc.	SWX	16.60%	16.66%	16.79%	**16.69%**	11.18%	11.17%	11.17%	11.62%	11.61%	11.61%	**11.39%**	10.41%	10.39%	10.39%	**10.40%**	**12.82%**
Low		9.15%	9.31%	9.39%	**9.29%**	11.18%	11.17%	11.17%	10.51%	10.49%	10.49%	**10.83%**					**10.25%**
Median		10.50%	10.66%	10.77%	**10.63%**	11.18%	11.17%	11.17%	11.10%	11.08%	11.08%	**11.13%**	10.41%	10.39%	10.39%	**10.40%**	**10.78%**
Mean		11.42%	11.53%	11.62%	**11.52%**	11.32%	11.31%	11.31%	11.09%	11.07%	11.07%	**11.20%**	10.41%	10.39%	10.39%	**10.40%**	**11.04%**
High		16.60%	16.66%	16.79%	**16.69%**	12.05%	12.04%	12.04%	11.62%	11.61%	11.61%	**11.67%**					**12.82%**

NATIONAL FUEL EXHIBIT JCS-3

PROXY GROUP SCREENING DATA AND RESULTS - PROXY GROUP

Company	Ticker	[1] Dividends	[2] S&P Credit Rating Between BBB- and AAA	[3] Covered by More Than 1 Analyst	[4] Postive Growth Rates From At Least 2 Sources	[5] % Regulated Operating Income of Total Income > 50%	[6] % Regulated Gas Income of Total Regulated Income > 60%	[7] Significant Merger or Transaction
Atmos Energy Corporation	ATO	Yes	A-	Yes	Yes	100.00%	64.53%	No
Chesapeake Utilities Corporation	CPK	Yes	BBB+	Yes	Yes	85.98%	53.61%	No
New Jersey Resources Corporation	NJR	Yes	A1	Yes	Yes	57.13%	88.56%	No
NiSource Inc.	NI	Yes	BBB+	Yes	Yes	100.00%	71.24%	No
Northwest Natural Holding Co.	NWN	Yes	A-	Yes	Yes	99.75%	91.14%	No
ONE Gas, Inc.	OGS	Yes	A-	Yes	Yes	100.00%	100.00%	No
Southwest Gas Holdings, Inc.	SWX	Yes	BBB+	Yes	Yes	78.43%	100.00%	No
Spire, Inc.	SR	Yes	BBB+	Yes	Yes	89.96%	92.34%	Yes
UGI Corporation	UGI	Yes	A3	Yes	Yes	28.13%	84.19%	No

Notes:
[1] Source: S&P Capital IQ
[2] Source: S&P Capital IQ Pro
[3] Source: S&P Capital IQ and Zacks
[4] Source: S&P Capital IQ, Value Line Investment Survey, and Zacks
[5] - [6] Source: Form 10-Ks for 2024, 2023, & 2022, three-year average
[7] Source: S&P Capital IQ Pro

NATIONAL FUEL EXHIBIT JCN-4

30-DAY CONSTANT GROWTH DCF

Company	Ticker	[1] Annualized Dividend	[2] Stock Price	[3] Dividend Yield	[4] Expected Dividend Yield	[5] Value Line Earnings Growth	[6] S&P Cap. IQ Earnings Growth	[7] Zacks Earnings Growth	[8] Average Growth Rate	[9] Low ROE	[10] Mean ROE	[11] High ROE
Atmos Energy Corporation	ATO	$4.00	$175.38	2.28%	2.37%	8.50%	7.49%	8.00%	8.00%	9.86%	10.37%	10.88%
New Jersey Resources Corporation	NJR	$1.90	$46.21	4.11%	4.26%	6.50%	7.90%	n/a	7.20%	10.75%	11.46%	12.17%
NiSource Inc.	NI	$1.12	$43.22	2.59%	2.69%	8.00%	7.93%	7.90%	7.94%	10.59%	10.64%	10.70%
Northwest Natural Holding Co.	NWN	$1.97	$47.32	4.16%	4.29%	6.50%	5.50%	n/a	6.00%	9.78%	10.29%	10.80%
ONE Gas Inc.	OGS	$2.68	$81.96	3.27%	3.36%	4.50%	6.66%	6.20%	5.79%	7.84%	9.15%	10.04%
Southwest Gas Holdings, Inc.	SWX	$2.48	$80.46	3.08%	3.29%	n/a	13.33%	13.30%	13.32%	16.59%	16.60%	16.62%
Spire, Inc.	SR	$3.14	$87.62	3.58%	3.73%	4.50%	8.92%	10.50%	7.97%	8.16%	11.70%	14.27%
Median				3.27%	3.36%	6.50%	7.90%	8.00%	7.94%	9.86%	10.64%	10.88%
Mean				3.30%	3.43%	6.42%	8.25%	9.18%	8.03%	10.51%	11.46%	12.21%

Notes:
[1] Source: S&P Capital IQ
[2] Source: S&P Capital IQ, equals 30-day average as of November 28, 2025
[3] Equals [1] / [2]
[4] Equals [3] x (1 + 0.50 x [8])
[5] Source: Value Line
[6] Source: S&P Capital IQ
[7] Source: Zacks
[8] Equals Average ([5], [6], [7])
[9] Equals [3] x (1 + 0.50 x Minimum ([5], [6], [7]) + Minimum ([5], [6], [7])
[10] Equals [4] + [8]
[11] Equals [3] x (1 + 0.50 x Maximum ([5], [6], [7]) + Maximum ([5], [6], [7])

90-DAY CONSTANT GROWTH DCF

Company	Ticker	[1] Annualized Dividend	[2] Stock Price	[3] Dividend Yield	[4] Expected Dividend Yield	[5] Value Line Earnings Growth	[6] S&P Cap. IQ Earnings Growth	[7] Zacks Earnings Growth	[8] Average Growth Rate	[9] Low ROE	[10] Mean ROE	[11] High ROE
Atmos Energy Corporation	ATO	$4.00	$169.03	2.37%	2.46%	8.50%	7.49%	8.00%	8.00%	9.95%	10.46%	10.97%
New Jersey Resources Corporation	NJR	$1.90	$46.58	4.08%	4.23%	6.50%	7.90%	n/a	7.20%	10.71%	11.43%	12.14%
NiSource Inc.	NI	$1.12	$42.48	2.64%	2.74%	8.00%	7.93%	7.90%	7.94%	10.64%	10.68%	10.74%
Northwest Natural Holding Co.	NWN	$1.97	$43.81	4.50%	4.63%	6.50%	5.50%	n/a	6.00%	10.12%	10.63%	11.14%
ONE Gas Inc.	OGS	$2.68	$78.27	3.42%	3.52%	4.50%	6.66%	6.20%	5.79%	8.00%	9.31%	10.20%
Southwest Gas Holdings, Inc.	SWX	$2.48	$79.07	3.14%	3.35%	n/a	13.33%	13.30%	13.32%	16.65%	16.66%	16.68%
Spire, Inc.	SR	$3.14	$81.02	3.88%	4.03%	4.50%	8.92%	10.50%	7.97%	8.46%	12.00%	14.58%
Median				3.42%	3.52%	6.50%	7.90%	8.00%	7.94%	10.12%	10.68%	11.14%
Mean				3.43%	3.57%	6.42%	8.25%	9.18%	8.03%	10.65%	11.60%	12.35%

Notes:
[1] Source: S&P Capital IQ
[2] Source: S&P Capital IQ, equals 90-day average as of November 28, 2025
[3] Equals [1] / [2]
[4] Equals [3] x (1 + 0.50 x [8])
[5] Source: Value Line
[6] Source: S&P Capital IQ
[7] Source: Zacks
[8] Equals Average ([5], [6], [7])
[9] Equals [3] x (1 + 0.50 x Minimum ([5], [6], [7]) + Minimum ([5], [6], [7])
[10] Equals [4] + [8]
[11] Equals [3] x (1 + 0.50 x Maximum ([5], [6], [7]) + Maximum ([5], [6], [7])

180-DAY CONSTANT GROWTH DCF

Company	Ticker	[1] Annualized Dividend	[2] Stock Price	[3] Dividend Yield	[4] Expected Dividend Yield	[5] Value Line Earnings Growth	[6] S&P Cap. IQ Earnings Growth	[7] Zacks Earnings Growth	[8] Average Growth Rate	[9] Low ROE	[10] Mean ROE	[11] High ROE
Atmos Energy Corporation	ATO	$4.00	$161.81	2.47%	2.57%	8.50%	7.49%	8.00%	8.00%	10.06%	10.57%	11.08%
New Jersey Resources Corporation	NJR	$1.90	$46.76	4.06%	4.21%	6.50%	7.90%	n/a	7.20%	10.70%	11.41%	12.12%
NiSource Inc.	NI	$1.12	$40.96	2.73%	2.84%	8.00%	7.93%	7.90%	7.94%	10.74%	10.79%	10.84%
Northwest Natural Holding Co.	NWN	$1.97	$42.66	4.62%	4.76%	6.50%	5.50%	n/a	6.00%	10.24%	10.76%	11.27%
ONE Gas Inc.	OGS	$2.68	$76.46	3.51%	3.61%	4.50%	6.66%	6.20%	5.79%	8.08%	9.39%	10.28%
Southwest Gas Holdings, Inc.	SWX	$2.48	$76.11	3.26%	3.48%	n/a	13.33%	13.30%	13.32%	16.78%	16.79%	16.81%
Spire, Inc.	SR	$3.14	$78.11	4.02%	4.18%	4.50%	8.92%	10.50%	7.97%	8.61%	12.15%	14.73%
Median				3.51%	3.61%	6.50%	7.90%	8.00%	7.94%	10.24%	10.79%	11.27%
Mean				3.52%	3.66%	6.42%	8.25%	9.18%	8.03%	10.74%	11.69%	12.45%

Notes:
[1] Source: S&P Capital IQ
[2] Source: S&P Capital IQ, equals 180-day average as of November 28, 2025
[3] Equals [1] / [2]
[4] Equals [3] x (1 + 0.50 x [8])
[5] Source: Value Line
[6] Source: S&P Capital IQ
[7] Source: Zacks
[8] Equals Average ([5], [6], [7])
[9] Equals [3] x (1 + 0.50 x Minimum ([5], [6], [7]) + Minimum ([5], [6], [7])
[10] Equals [4] + [8]
[11] Equals [3] x (1 + 0.50 x Maximum ([5], [6], [7]) + Maximum ([5], [6], [7])

NATIONAL FUEL EXHIBIT JCN-5

MARKET RISK PREMIUM DERIVED FROM S&P 500 - ALL COMPANIES

[1] Estimate of the S&P 500 Dividend Yield	1.16%
[2] Estimate of the S&P 500 Growth Rate	13.85%
[3] S&P 500 Estimated Required Market Return	15.09%

Notes:
[1] Sum of [9]
[2] Sum of [11]
[3] Equals ([1] x (1 + 0.5 x [2])) + [2]

STANDARD AND POOR'S 500 INDEX

		[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]
Name	Ticker	Price	Shares Outstanding	Market Capitalization	Weight in Index	Current Dividend Yield	Cap-Weighted Dividend Yield	Value Line Long-Term Growth Est.	Cap-Weighted Long-Term Growth Est.
3M Company	MMM	172.05	531	91,397	0.15%	1.70%	0.00%	38.50%	0.06%
A. O. Smith Corporation	AOS	65.98	139	9,187	0.02%	2.18%	0.00%	7.50%	0.00%
Abbott Laboratories	ABT	128.90	1,739	224,141	0.38%	1.83%	0.01%	6.00%	0.02%
AbbVie Inc.	ABBV	227.70	1,767	402,433	0.67%	3.04%	0.02%	7.00%	0.05%
Accenture plc	ACN	250.00	620	155,035	0.26%	2.43%	0.01%	12.50%	0.03%
Adobe Inc.	ADBE	320.13	419	134,006	0.22%	0.00%	0.00%	14.50%	0.03%
Advanced Micro Devices, Inc.	AMD	217.53	1,628	354,148	0.59%	0.00%	0.00%	19.00%	0.11%
Aflac Incorporated	AFL	110.31	524	57,815	0.10%	2.21%	0.00%	8.50%	0.01%
Agilent Technologies, Inc.	A	153.50	283	43,449	0.07%	0.66%	0.00%	7.50%	0.01%
Air Products and Chemicals, Inc.	APD	261.05	223	58,107	0.10%	2.74%	0.00%	10.50%	0.01%
Airbnb, Inc.	ABNB	116.99	606	70,937	0.12%	0.00%	0.00%	23.00%	0.03%
Akamai Technologies, Inc.	AKAM	89.52	144	12,879	0.02%	0.00%	0.00%	8.00%	0.00%
Albemarle Corporation	ALB	129.99	118	15,300	0.03%	1.25%	0.00%	4.50%	0.00%
Alexandria Real Estate Equities, Inc.	ARE	53.67	173	9,276	0.02%	9.84%	0.00%	-1.00%	0.00%
Align Technology, Inc.	ALGN	147.19	72	10,561	0.02%	0.00%	0.00%	11.50%	0.00%
Allegion plc	ALLE	166.03	86	14,284	0.02%	1.21%	0.00%	7.00%	0.00%
Alliant Energy Corporation	LNT	69.47	257	17,858	0.03%	2.92%	0.00%	6.00%	0.00%
Alphabet Inc.	GOOGL	320.18	12,067	3,863,612	6.47%	0.26%	0.02%	12.00%	0.78%
Altria Group, Inc.	MO	59.01	1,679	99,058	0.17%	7.19%	0.01%	6.00%	0.01%
Amazon.com, Inc.	AMZN	233.22	10,690	2,493,172	4.17%	0.00%	0.00%	23.00%	0.96%
Amcor plc	AMCR	8.52	2,305	19,637	0.03%	6.02%	0.00%	11.50%	0.00%
Ameren Corporation	AEE	106.35	270	28,767	0.05%	2.67%	0.00%	6.50%	0.00%
American Electric Power Company, Inc.	AEP	123.77	534	66,105	0.11%	3.07%	0.00%	6.50%	0.01%
American Express Company	AXP	365.27	689	251,617	0.42%	0.90%	0.00%	11.00%	0.05%
American International Group, Inc.	AIG	76.16	540	41,094	0.07%	2.36%	0.00%	15.00%	0.01%
American Tower Corporation	AMT	181.27	468	84,861	0.14%	3.75%	0.01%	10.00%	0.01%
American Water Works Company, Inc.	AWK	130.07	195	25,380	0.04%	2.54%	0.00%	4.50%	0.00%
Ameriprise Financial, Inc.	AMP	455.74	93	42,341	0.07%	1.40%	0.00%	9.00%	0.01%
AMETEK, Inc.	AME	197.89	230	45,555	0.08%	0.63%	0.00%	8.50%	0.01%
Amgen Inc.	AMGN	345.46	538	186,024	0.31%	2.76%	0.01%	5.50%	0.02%
Amphenol Corporation	APH	140.90	1,224	172,469	0.29%	0.71%	0.00%	18.50%	0.05%
Analog Devices, Inc.	ADI	265.34	490	129,925	0.22%	1.49%	0.00%	9.00%	0.02%
Aon plc	AON	353.92	215	76,070	0.13%	0.82%	0.00%	11.50%	0.01%
APA Corporation	APA	24.97	355	8,856	0.01%	4.00%	0.00%	3.00%	0.00%
Apollo Global Management, Inc.	APO	131.85	580	76,529	0.13%	1.55%	0.00%	24.50%	0.03%
Apple Inc.	AAPL	278.85	14,776	4,120,386	6.90%	0.37%	0.03%	10.00%	0.69%
Applied Materials, Inc.	AMAT	252.25	797	200,953	0.34%	0.73%	0.00%	8.00%	0.03%
AppLovin Corporation	APP	599.48	338	202,597	0.34%	0.00%	0.00%	53.00%	0.18%
Aptiv PLC	APTV	77.55	216	16,757	0.03%	0.00%	0.00%	28.50%	0.01%
Arch Capital Group Ltd.	ACGL	93.92	361	33,914	0.06%	0.00%	0.00%	10.00%	0.01%
Archer-Daniels-Midland Company	ADM	60.74	481	29,190	0.05%	3.36%	0.00%	2.00%	0.00%
Arista Networks Inc	ANET	130.68	1,259	164,563	0.28%	0.00%	0.00%	16.50%	0.05%
Arthur J. Gallagher & Co.	AJG	247.62	257	63,590	0.11%	1.05%	0.00%	25.00%	0.03%
Assurant, Inc.	AIZ	228.16	50	11,427	0.02%	1.54%	0.00%	9.50%	0.00%
AT&T Inc.	T	26.02	7,089	184,467	0.31%	4.27%	0.01%	6.50%	0.02%
Atmos Energy Corporation	ATO	176.37	162	28,518	0.05%	2.27%	0.00%	8.50%	0.00%
Autodesk, Inc.	ADSK	303.34	212	64,182	0.11%	0.00%	0.00%	10.50%	0.01%
Automatic Data Processing, Inc.	ADP	255.30	404	103,256	0.17%	2.66%	0.00%	6.00%	0.01%
AutoZone, Inc.	AZO	3,954.33	17	65,771	0.11%	0.00%	0.00%	7.50%	0.01%
AvalonBay Communities, Inc.	AVB	181.94	141	25,731	0.04%	3.85%	0.00%	6.50%	0.00%
Avery Dennison Corporation	AVY	172.37	77	13,323	0.02%	2.18%	0.00%	2.00%	0.00%
Axon Enterprise, Inc.	AXON	540.14	79	42,623	0.07%	0.00%	0.00%	29.00%	0.02%
Baker Hughes Company	BKR	50.20	987	49,536	0.08%	1.83%	0.00%	20.00%	0.02%
Ball Corporation	BALL	49.53	268	13,273	0.02%	1.62%	0.00%	10.50%	0.00%
Bank of America Corporation	BAC	53.65	7,302	391,779	0.66%	2.09%	0.01%	8.50%	0.06%
Baxter International Inc.	BAX	18.74	514	9,633	0.02%	0.21%	0.00%	0.50%	0.00%
Becton, Dickinson and Company	BDX	194.02	285	55,377	0.09%	2.16%	0.00%	7.50%	0.01%
Berkshire Hathaway Inc.	BRK.A	770,100.00	1	1,107,928	1.85%	0.00%	0.00%	9.50%	0.18%
Best Buy Co., Inc.	BBY	79.28	210	16,657	0.03%	4.79%	0.00%	3.00%	0.00%
Biogen Inc.	BIIB	182.09	147	26,713	0.04%	0.00%	0.00%	1.00%	0.00%
Bio-Techne Corporation	TECH	64.51	156	10,051	0.02%	0.50%	0.00%	18.00%	0.00%
BlackRock, Inc.	BLK	1,047.30	155	162,490	0.27%	1.99%	0.01%	11.00%	0.03%

STANDARD AND POOR'S 500 INDEX

Name	Ticker	[4] Price	[5] Shares Outstanding	[6] Market Capitalization	[7] Weight in Index	[8] Current Dividend Yield	[9] Cap-Weighted Dividend Yield	[10] Value Line Long-Term Growth Est.	[11] Cap-Weighted Long-Term Growth Est.
Blackstone Inc.	BX	146.42	783	114,607	0.19%	3.52%	0.01%	26.00%	0.05%
Block, Inc.	XYZ	66.80	608	Excl.	0.00%	0.00%	0.00%	NA	n/a
Booking Holdings Inc.	BKNG	4,914.69	32	158,419	0.27%	0.78%	0.00%	14.50%	0.04%
Boston Scientific Corporation	BSX	101.58	1,482	150,586	0.25%	0.00%	0.00%	13.00%	0.03%
Bristol-Myers Squibb Company	BMY	49.20	2,036	100,159	0.17%	5.04%	0.01%	27.50%	0.05%
Broadcom Inc.	AVGO	402.96	4,722	1,902,924	3.19%	0.59%	0.02%	24.50%	0.78%
Broadridge Financial Solutions, Inc.	BR	228.09	117	26,624	0.04%	1.71%	0.00%	9.50%	0.00%
Brown & Brown, Inc.	BRO	80.43	341	27,460	0.05%	0.82%	0.00%	11.00%	0.01%
Brown-Forman Corporation	BF.B	28.98	473	13,700	0.02%	3.19%	0.00%	7.50%	0.00%
Builders FirstSource, Inc.	BLDR	112.23	111	12,410	0.02%	0.00%	0.00%	-1.50%	0.00%
Bunge Global SA	BG	96.07	193	18,576	0.03%	2.91%	0.00%	1.50%	0.00%
BXP, Inc.	BXP	72.36	158	11,467	0.02%	3.87%	0.00%	1.50%	0.00%
C.H. Robinson Worldwide, Inc.	CHRW	158.87	118	18,768	0.03%	1.59%	0.00%	10.50%	0.00%
Cadence Design Systems, Inc.	CDNS	311.84	272	84,883	0.14%	0.00%	0.00%	12.00%	0.02%
Camden Property Trust	CPT	106.34	106	11,314	0.02%	3.95%	0.00%	-6.50%	0.00%
Capital One Financial Corporation	COF	219.07	636	139,270	0.23%	1.46%	0.00%	10.00%	0.02%
Cardinal Health, Inc.	CAH	212.26	238	50,432	0.08%	0.96%	0.00%	13.00%	0.01%
Carnival Corporation & plc	CCL	25.78	1,313	Excl.	0.00%	0.00%	0.00%	NA	n/a
Carrier Global Corporation	CARR	54.88	842	46,220	0.08%	1.64%	0.00%	12.00%	0.01%
Caterpillar Inc.	CAT	575.76	468	269,444	0.45%	1.05%	0.00%	8.50%	0.04%
Cboe Global Markets, Inc.	CBOE	258.17	105	27,016	0.05%	1.12%	0.00%	13.00%	0.01%
CBRE Group, Inc.	CBRE	161.83	293	47,438	0.08%	0.00%	0.00%	9.00%	0.01%
CDW Corporation	CDW	144.22	130	18,777	0.03%	1.75%	0.00%	6.50%	0.00%
Cencora, Inc.	COR	368.93	194	71,570	0.12%	0.65%	0.00%	11.00%	0.01%
Centene Corporation	CNC	39.34	492	19,336	0.03%	0.00%	0.00%	9.50%	0.00%
CenterPoint Energy, Inc.	CNP	39.98	653	26,102	0.04%	2.20%	0.00%	7.00%	0.00%
CF Industries Holdings, Inc.	CF	78.70	156	Excl.	0.00%	2.54%	0.00%	NA	n/a
Charles River Laboratories International, Inc.	CRL	178.14	49	8,767	0.01%	0.00%	0.00%	5.00%	0.00%
Charter Communications, Inc.	CHTR	200.12	129	25,897	0.04%	0.00%	0.00%	6.50%	0.00%
Chevron Corporation	CVX	151.13	2,014	304,304	0.51%	4.53%	0.02%	1.50%	0.01%
Chipotle Mexican Grill, Inc.	CMG	34.52	1,322	45,645	0.08%	0.00%	0.00%	17.00%	0.01%
Chubb Limited	CB	296.18	394	116,562	0.20%	1.29%	0.00%	11.00%	0.02%
Church & Dwight Co., Inc.	CHD	85.16	240	20,449	0.03%	1.39%	0.00%	8.00%	0.00%
Cincinnati Financial Corporation	CINF	167.59	156	26,147	0.04%	2.08%	0.00%	11.00%	0.00%
Cintas Corporation	CTAS	186.02	402	74,755	0.13%	0.97%	0.00%	13.50%	0.02%
Cisco Systems, Inc.	CSCO	76.94	3,951	303,997	0.51%	2.13%	0.01%	5.50%	0.03%
Citigroup Inc.	C	103.60	1,789	185,368	0.31%	2.32%	0.01%	3.00%	0.01%
Citizens Financial Group, Inc.	CFG	54.10	429	23,235	0.04%	3.40%	0.00%	10.50%	0.00%
CME Group Inc.	CME	281.46	361	101,494	0.17%	1.78%	0.00%	5.50%	0.01%
CMS Energy Corporation	CMS	75.44	304	22,958	0.04%	2.88%	0.00%	8.50%	0.00%
Cognizant Technology Solutions Corporation	CTSH	77.71	483	37,506	0.06%	1.60%	0.00%	9.00%	0.01%
Coinbase Global, Inc.	COIN	272.82	270	Excl.	0.00%	0.00%	0.00%	NA	n/a
Colgate-Palmolive Company	CL	80.39	806	64,800	0.11%	2.59%	0.00%	10.00%	0.01%
Comcast Corporation	CMCSA	26.69	3,644	97,256	0.16%	4.95%	0.01%	7.50%	0.01%
Conagra Brands, Inc.	CAG	17.85	478	8,539	0.01%	7.84%	0.00%	1.00%	0.00%
ConocoPhillips	COP	88.69	1,236	109,596	0.18%	3.79%	0.01%	1.50%	0.00%
Consolidated Edison, Inc.	ED	100.36	361	36,223	0.06%	3.39%	0.00%	6.00%	0.00%
Constellation Brands, Inc.	STZ	136.38	174	23,736	0.04%	2.99%	0.00%	3.50%	0.00%
Constellation Energy Corporation	CEG	364.36	312	113,786	0.19%	0.43%	0.00%	18.00%	0.03%
Copart, Inc.	CPRT	38.98	968	37,733	0.06%	0.00%	0.00%	8.00%	0.01%
Corning Incorporated	GLW	84.20	857	72,190	0.12%	1.33%	0.00%	23.00%	0.03%
Corpay, Inc.	CPAY	295.80	70	20,694	0.03%	0.00%	0.00%	12.50%	0.00%
Corteva, Inc.	CTVA	67.47	676	45,592	0.08%	1.07%	0.00%	9.50%	0.01%
CoStar Group, Inc.	CSGP	68.80	424	29,159	0.05%	0.00%	0.00%	21.50%	0.01%
Costco Wholesale Corporation	COST	913.59	443	404,884	0.68%	0.57%	0.00%	11.50%	0.08%
Coterra Energy Inc.	CTRA	26.84	761	20,435	0.03%	3.28%	0.00%	7.00%	0.00%
CrowdStrike Holdings, Inc.	CRWD	509.16	251	Excl.	0.00%	0.00%	0.00%	NA	n/a
Crown Castle Inc.	CCI	91.28	435	Excl.	0.00%	4.66%	0.00%	NA	n/a
CSX Corporation	CSX	35.36	1,862	65,841	0.11%	1.47%	0.00%	7.00%	0.01%
Cummins Inc.	CMI	497.98	138	68,739	0.12%	1.61%	0.00%	8.00%	0.01%
CVS Health Corporation	CVS	80.36	1,269	102,012	0.17%	3.31%	0.01%	2.50%	0.00%
D.R. Horton, Inc.	DHI	159.01	292	46,441	0.08%	1.13%	0.00%	2.50%	0.00%
Danaher Corporation	DHR	226.78	706	160,186	0.27%	0.56%	0.00%	4.50%	0.01%
Darden Restaurants, Inc.	DRI	179.58	116	20,888	0.03%	3.34%	0.00%	11.00%	0.00%
Datadog, Inc.	DDOG	160.01	351	56,111	0.09%	0.00%	0.00%	21.50%	0.02%
DaVita Inc.	DVA	119.68	71	8,449	0.01%	0.00%	0.00%	10.50%	0.00%
Dayforce Inc.	DAY	69.10	160	11,058	0.02%	0.00%	0.00%	49.00%	0.01%
Deckers Outdoor Corporation	DECK	88.03	146	12,830	0.02%	0.00%	0.00%	12.00%	0.00%
Deere & Company	DE	464.49	270	125,565	0.21%	1.40%	0.00%	1.00%	0.00%
Dell Technologies Inc.	DELL	133.35	670	89,371	0.15%	1.57%	0.00%	10.50%	0.02%
Delta Air Lines, Inc.	DAL	64.10	649	41,578	0.07%	1.17%	0.00%	9.50%	0.01%
Devon Energy Corporation	DVN	37.06	627	23,248	0.04%	2.59%	0.00%	-1.50%	0.00%
DexCom, Inc.	DXCM	63.47	390	24,754	0.04%	0.00%	0.00%	22.50%	0.01%
Diamondback Energy, Inc.	FANG	152.59	286	43,701	0.07%	2.62%	0.00%	1.50%	0.00%
Digital Realty Trust, Inc.	DLR	160.12	344	55,001	0.09%	3.05%	0.00%	9.50%	0.01%
Dollar General Corporation	DG	109.49	220	24,099	0.04%	2.16%	0.00%	1.50%	0.00%
Dollar Tree, Inc.	DLTR	110.81	202	22,360	0.04%	0.00%	0.00%	22.00%	0.01%

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Dominion Energy, Inc.	D	62.77	854	53,600	0.09%	4.25%	0.00%	6.00%	0.01%
Domino's Pizza, Inc.	DPZ	419.63	34	14,178	0.02%	1.66%	0.00%	13.50%	0.00%
DoorDash, Inc.	DASH	198.37	431	Excl.	0.00%	0.00%	0.00%	NA	n/a
Dover Corporation	DOV	185.28	137	25,412	0.04%	1.12%	0.00%	5.00%	0.00%
Dow Inc.	DOW	23.85	711	16,952	0.03%	5.87%	0.00%	2.50%	0.00%
DTE Energy Company	DTE	137.03	208	28,459	0.05%	3.18%	0.00%	4.50%	0.00%
Duke Energy Corporation	DUK	123.94	778	96,383	0.16%	3.44%	0.01%	6.00%	0.01%
DuPont de Nemours, Inc.	DD	39.77	419	16,663	0.03%	2.01%	0.00%	10.50%	0.00%
Eaton Corporation plc	ETN	345.89	388	134,344	0.22%	1.20%	0.00%	11.00%	0.02%
eBay Inc.	EBAY	82.79	452	37,421	0.06%	1.40%	0.00%	10.50%	0.01%
Ecolab Inc.	ECL	275.16	283	77,935	0.13%	0.94%	0.00%	8.00%	0.01%
Edison International	EIX	58.89	385	22,660	0.04%	5.62%	0.00%	6.50%	0.00%
Edwards Lifesciences Corporation	EW	86.67	580	50,295	0.08%	0.00%	0.00%	8.00%	0.01%
Electronic Arts Inc.	EA	202.03	249	50,387	0.08%	0.38%	0.00%	11.50%	0.01%
Elevance Health, Inc.	ELV	338.26	222	75,174	0.13%	2.02%	0.00%	8.50%	0.01%
Eli Lilly and Company	LLY	1,075.47	895	962,958	1.61%	0.56%	0.01%	26.50%	0.43%
EMCOR Group, Inc.	EME	615.07	45	27,534	0.05%	0.16%	0.00%	16.50%	0.01%
Emerson Electric Co.	EMR	133.38	562	74,933	0.13%	1.66%	0.00%	11.00%	0.01%
Entergy Corporation	ETR	97.52	452	44,107	0.07%	2.63%	0.00%	3.00%	0.00%
EOG Resources, Inc.	EOG	107.85	543	58,519	0.10%	3.78%	0.00%	3.50%	0.00%
EPAM Systems, Inc.	EPAM	187.00	55	10,330	0.02%	0.00%	0.00%	20.50%	0.00%
EQT Corporation	EQT	60.86	624	37,981	0.06%	1.08%	0.00%	11.00%	0.01%
Equifax Inc.	EFX	212.37	122	25,993	0.04%	0.94%	0.00%	7.50%	0.00%
Equinix, Inc.	EQIX	753.31	98	73,965	0.12%	2.49%	0.00%	15.00%	0.02%
Equity Residential	EQR	61.75	380	23,494	0.04%	4.49%	0.00%	4.00%	0.00%
Erie Indemnity Company	ERIE	295.49	52	15,451	0.03%	1.85%	0.00%	16.00%	0.00%
Essex Property Trust, Inc.	ESS	263.62	64	16,978	0.03%	3.90%	0.00%	7.50%	0.00%
Everest Group, Ltd.	EG	314.29	42	13,193	0.02%	2.55%	0.00%	6.00%	0.00%
Evergy, Inc.	EVRG	77.65	230	17,876	0.03%	3.58%	0.00%	7.50%	0.00%
Eversource Energy	ES	67.18	375	25,205	0.04%	4.48%	0.00%	5.50%	0.00%
Exelon Corporation	EXC	47.12	1,010	47,605	0.08%	3.40%	0.00%	5.50%	0.00%
Expand Energy Corporation	EXE	121.93	238	Excl.	0.00%	1.89%	0.00%	NA	n/a
Expedia Group, Inc.	EXPE	255.69	123	31,330	0.05%	0.63%	0.00%	39.00%	0.02%
Expeditors International of Washington, Inc.	EXPD	146.90	134	19,688	0.03%	1.05%	0.00%	1.00%	0.00%
Extra Space Storage Inc.	EXR	133.17	212	28,265	0.05%	4.87%	0.00%	-1.00%	0.00%
Exxon Mobil Corporation	XOM	115.92	4,217	488,854	0.82%	3.55%	0.03%	-3.00%	-0.02%
F5, Inc.	FFIV	239.16	58	13,893	0.02%	0.00%	0.00%	9.50%	0.00%
FactSet Research Systems Inc.	FDS	277.27	37	10,375	0.02%	1.59%	0.00%	7.50%	0.00%
Fair Isaac Corporation	FICO	1,805.83	24	42,815	0.07%	0.00%	0.00%	21.50%	0.02%
Fastenal Company	FAST	40.40	1,148	46,381	0.08%	2.18%	0.00%	8.00%	0.01%
Federal Realty Investment Trust	FRT	98.73	86	8,517	0.01%	4.58%	0.00%	2.00%	0.00%
FedEx Corporation	FDX	275.68	236	65,048	0.11%	2.10%	0.00%	6.50%	0.01%
Fidelity National Information Services, Inc.	FIS	65.77	518	34,059	0.06%	2.43%	0.00%	7.00%	0.00%
Fifth Third Bancorp	FITB	43.46	661	28,728	0.05%	3.68%	0.00%	7.50%	0.00%
First Solar, Inc.	FSLR	272.92	107	29,287	0.05%	0.00%	0.00%	26.00%	0.01%
FirstEnergy Corp.	FE	47.72	578	27,566	0.05%	3.73%	0.00%	5.00%	0.00%
Fiserv, Inc.	FISV	61.47	538	33,062	0.06%	0.00%	0.00%	10.00%	0.01%
Ford Motor Company	F	13.28	3,984	52,914	0.09%	4.52%	0.00%	20.50%	0.02%
Fortinet, Inc.	FTNT	81.13	744	60,332	0.10%	0.00%	0.00%	12.50%	0.01%
Fortive Corporation	FTV	53.48	318	16,986	0.03%	0.45%	0.00%	6.50%	0.00%
Fox Corporation	FOXA	65.50	444	29,078	0.05%	0.85%	0.00%	6.00%	0.00%
Franklin Resources, Inc.	BEN	22.59	521	11,769	0.02%	5.67%	0.00%	4.00%	0.00%
Freeport-McMoRan Inc.	FCX	42.98	1,436	61,716	0.10%	1.40%	0.00%	18.00%	0.02%
Garmin Ltd.	GRMN	195.32	192	37,567	0.06%	1.84%	0.00%	7.00%	0.00%
Gartner, Inc.	IT	232.74	72	16,775	0.03%	0.00%	0.00%	6.50%	0.00%
GE HealthCare Technologies Inc.	GEHC	79.99	456	Excl.	0.00%	0.18%	0.00%	NA	n/a
GE Vernova Inc.	GEV	599.77	271	Excl.	0.00%	0.17%	0.00%	NA	n/a
Gen Digital Inc.	GEN	26.37	617	16,263	0.03%	1.90%	0.00%	10.50%	0.00%
Generac Holdings Inc.	GNRC	151.63	59	8,898	0.01%	0.00%	0.00%	18.50%	0.00%
General Dynamics Corporation	GD	341.63	270	92,143	0.15%	1.76%	0.00%	13.50%	0.02%
General Electric Company	GE	298.45	1,055	314,809	0.53%	0.48%	0.00%	22.00%	0.12%
General Mills, Inc.	GIS	47.35	533	25,257	0.04%	5.15%	0.00%	1.00%	0.00%
General Motors Company	GM	73.52	937	68,919	0.12%	0.82%	0.00%	9.50%	0.01%
Genuine Parts Company	GPC	130.40	139	18,140	0.03%	3.16%	0.00%	2.00%	0.00%
Gilead Sciences, Inc.	GILD	125.84	1,241	156,127	0.26%	2.51%	0.01%	16.00%	0.04%
Global Payments Inc.	GPN	75.76	237	17,936	0.03%	1.32%	0.00%	7.00%	0.00%
Globe Life Inc.	GL	134.73	80	10,725	0.02%	0.80%	0.00%	10.00%	0.00%
GoDaddy Inc.	GDDY	127.86	135	17,279	0.03%	0.00%	0.00%	12.50%	0.00%
Halliburton Company	HAL	26.22	842	22,067	0.04%	2.59%	0.00%	7.50%	0.00%
Hasbro, Inc.	HAS	82.60	140	11,592	0.02%	3.39%	0.00%	8.50%	0.00%
HCA Healthcare, Inc.	HCA	508.29	228	115,989	0.19%	0.57%	0.00%	11.50%	0.02%
Healthpeak Properties, Inc.	DOC	18.26	695	12,690	0.02%	6.68%	0.00%	6.00%	0.00%
Henry Schein, Inc.	HSIC	74.57	118	8,779	0.01%	0.00%	0.00%	10.50%	0.00%
Hewlett Packard Enterprise Company	HPE	21.87	1,319	28,856	0.05%	2.38%	0.00%	5.50%	0.00%
Hilton Worldwide Holdings Inc.	HLT	285.03	232	Excl.	0.00%	0.21%	0.00%	NA	n/a
Hologic, Inc.	HOLX	74.97	223	16,711	0.03%	0.00%	0.00%	2.00%	0.00%
Honeywell International Inc.	HON	192.19	635	122,019	0.20%	2.48%	0.01%	9.50%	0.02%

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Hormel Foods Corporation	HRL	23.21	550	12,765	0.02%	5.04%	0.00%	5.00%	0.00%
Host Hotels & Resorts, Inc.	HST	17.63	688	12,124	0.02%	4.54%	0.00%	11.00%	0.00%
Howmet Aerospace Inc.	HWM	204.59	402	82,258	0.14%	0.23%	0.00%	12.00%	0.02%
HP Inc.	HPQ	24.42	935	22,825	0.04%	4.91%	0.00%	5.00%	0.00%
Hubbell Incorporated	HUBB	431.43	53	22,928	0.04%	1.32%	0.00%	6.00%	0.00%
Humana Inc.	HUM	245.77	120	29,560	0.05%	1.44%	0.00%	2.00%	0.00%
Huntington Bancshares Incorporated	HBAN	16.30	1,572	25,626	0.04%	3.80%	0.00%	7.50%	0.00%
Huntington Ingalls Industries, Inc.	HII	313.62	39	12,307	0.02%	1.76%	0.00%	11.50%	0.00%
IDEX Corporation	IEX	173.93	75	13,019	0.02%	1.63%	0.00%	5.00%	0.00%
IDEXX Laboratories, Inc.	IDXX	752.88	80	60,118	0.10%	0.00%	0.00%	12.50%	0.01%
Illinois Tool Works Inc.	ITW	249.28	290	72,316	0.12%	2.58%	0.00%	9.00%	0.01%
Incyte Corporation	INCY	104.46	196	20,508	0.03%	0.00%	0.00%	35.00%	0.01%
Ingersoll Rand Inc.	IR	80.34	395	31,743	0.05%	0.10%	0.00%	8.50%	0.00%
Insulet Corporation	PODD	327.19	70	23,017	0.04%	0.00%	0.00%	33.50%	0.01%
Intel Corporation	INTC	40.56	4,770	193,471	0.32%	0.00%	0.00%	18.00%	0.06%
Interactive Brokers Group, Inc.	IBKR	65.02	445	28,958	0.05%	0.49%	0.00%	14.00%	0.01%
Intercontinental Exchange, Inc.	ICE	157.30	570	89,689	0.15%	1.22%	0.00%	7.00%	0.01%
International Business Machines Corporation	IBM	308.58	935	288,441	0.48%	2.18%	0.01%	3.00%	0.01%
International Flavors & Fragrances Inc.	IFF	69.48	256	17,794	0.03%	2.30%	0.00%	2.00%	0.00%
International Paper Company	IP	39.48	528	20,847	0.03%	4.69%	0.00%	16.50%	0.01%
Intuit Inc.	INTU	634.08	278	176,448	0.30%	0.76%	0.00%	13.50%	0.04%
Intuitive Surgical, Inc.	ISRG	573.48	354	203,296	0.34%	0.00%	0.00%	16.00%	0.05%
Invesco Ltd.	IVZ	24.45	445	10,883	0.02%	3.44%	0.00%	23.00%	0.00%
Invitation Homes Inc.	INVH	28.20	613	17,287	0.03%	4.11%	0.00%	10.00%	0.00%
IQVIA Holdings Inc.	IQV	230.01	170	39,171	0.07%	0.00%	0.00%	8.50%	0.01%
Iron Mountain Incorporated	IRM	86.35	296	25,524	0.04%	4.00%	0.00%	4.50%	0.00%
J.B. Hunt Transport Services, Inc.	JBHT	173.96	95	16,564	0.03%	1.01%	0.00%	7.00%	0.00%
Jabil Inc.	JBL	210.71	107	22,512	0.04%	0.15%	0.00%	12.00%	0.00%
Jack Henry & Associates, Inc.	JKHY	174.48	72	12,628	0.02%	1.33%	0.00%	9.00%	0.00%
Jacobs Solutions Inc.	J	134.81	119	16,009	0.03%	0.95%	0.00%	7.00%	0.00%
Johnson & Johnson	JNJ	206.92	2,409	498,531	0.83%	2.51%	0.02%	4.50%	0.04%
Johnson Controls International plc	JCI	116.31	611	71,081	0.12%	1.30%	0.00%	11.50%	0.01%
JPMorgan Chase & Co.	JPM	313.08	2,722	852,286	1.43%	1.92%	0.03%	10.00%	0.14%
Kellanova	K	83.64	348	29,101	0.05%	2.77%	0.00%	2.50%	0.00%
Kenvue Inc.	KVUE	17.35	1,916	Excl.	0.00%	4.78%	0.00%	NA	n/a
Keurig Dr Pepper Inc.	KDP	27.90	1,359	37,904	0.06%	3.30%	0.00%	13.00%	0.01%
KeyCorp	KEY	18.38	1,093	20,088	0.03%	4.46%	0.00%	7.50%	0.00%
Keysight Technologies, Inc.	KEYS	197.95	171	33,889	0.06%	0.00%	0.00%	6.50%	0.00%
Kimberly-Clark Corporation	KMB	109.12	332	36,212	0.06%	4.62%	0.00%	7.00%	0.00%
Kimco Realty Corporation	KIM	20.66	677	13,991	0.02%	5.03%	0.00%	27.50%	0.01%
Kinder Morgan, Inc.	KMI	27.32	2,225	60,780	0.10%	4.28%	0.00%	8.50%	0.01%
KKR & Co. Inc.	KKR	122.31	891	109,021	0.18%	0.61%	0.00%	7.00%	0.01%
KLA Corporation	KLAC	1,175.47	131	154,448	0.26%	0.65%	0.00%	12.50%	0.03%
L3Harris Technologies, Inc.	LHX	278.69	187	52,130	0.09%	1.72%	0.00%	16.00%	0.01%
Labcorp Holdings Inc.	LH	268.78	83	22,282	0.04%	1.07%	0.00%	6.50%	0.00%
Lam Research Corporation	LRCX	156.00	1,256	195,941	0.33%	0.67%	0.00%	12.50%	0.04%
Lamb Weston Holdings, Inc.	LW	59.06	139	8,230	0.01%	2.51%	0.00%	4.00%	0.00%
Las Vegas Sands Corp.	LVS	68.16	676	Excl.	0.00%	1.47%	0.00%	NA	n/a
Leidos Holdings, Inc.	LDOS	191.10	128	24,433	0.04%	0.90%	0.00%	12.50%	0.01%
Lennar Corporation	LEN	131.30	247	32,433	0.05%	1.52%	0.00%	3.00%	0.00%
Lennox International Inc.	LII	498.87	35	17,497	0.03%	1.04%	0.00%	11.00%	0.00%
Linde plc	LIN	410.32	467	191,598	0.32%	1.46%	0.00%	7.50%	0.02%
Live Nation Entertainment, Inc.	LYV	131.45	232	Excl.	0.00%	0.00%	0.00%	NA	n/a
LKQ Corporation	LKQ	29.69	256	7,600	0.01%	4.04%	0.00%	4.50%	0.00%
Lockheed Martin Corporation	LMT	457.86	231	105,948	0.18%	3.01%	0.01%	12.50%	0.02%
Loews Corporation	L	107.87	207	22,292	0.04%	0.23%	0.00%	14.00%	0.01%
Lowe's Companies, Inc.	LOW	242.48	561	136,020	0.23%	1.98%	0.00%	5.50%	0.01%
lululemon athletica inc.	LULU	184.18	119	21,841	0.04%	0.00%	0.00%	12.00%	0.00%
LyondellBasell Industries N.V.	LYB	48.99	322	15,769	0.03%	11.19%	0.00%	-6.00%	0.00%
M&T Bank Corporation	MTB	190.22	154	29,235	0.05%	3.15%	0.00%	5.50%	0.00%
Marathon Petroleum Corporation	MPC	193.73	301	58,236	0.10%	2.06%	0.00%	-8.00%	-0.01%
Marriott International, Inc.	MAR	304.79	268	81,791	0.14%	0.88%	0.00%	9.00%	0.01%
Marsh & McLennan Companies, Inc.	MMC	183.45	490	89,874	0.15%	1.96%	0.00%	14.00%	0.02%
Martin Marietta Materials, Inc.	MLM	623.24	60	37,586	0.06%	0.53%	0.00%	9.50%	0.01%
Masco Corporation	MAS	64.87	208	13,473	0.02%	1.91%	0.00%	10.00%	0.00%
Mastercard Incorporated	MA	550.53	898	494,374	0.83%	0.55%	0.00%	11.00%	0.09%
Match Group, Inc.	MTCH	33.31	236	7,863	0.01%	2.28%	0.00%	6.50%	0.00%
McCormick & Company, Incorporated	MKC	67.48	268	18,110	0.03%	2.85%	0.00%	6.00%	0.00%
McDonald's Corporation	MCD	311.82	712	222,064	0.37%	2.39%	0.01%	8.50%	0.03%
McKesson Corporation	MCK	881.12	123	108,754	0.18%	0.37%	0.00%	12.00%	0.02%
Medtronic plc	MDT	105.33	1,282	135,035	0.23%	2.68%	0.01%	7.00%	0.02%
Merck & Co., Inc.	MRK	104.83	2,482	260,190	0.44%	3.24%	0.01%	13.00%	0.06%
Meta Platforms, Inc.	META	647.95	2,521	1,633,176	2.73%	0.32%	0.01%	18.00%	0.49%
MetLife, Inc.	MET	76.56	659	50,445	0.08%	2.96%	0.00%	7.50%	0.01%
Mettler-Toledo International Inc.	MTD	1,476.72	20	30,167	0.05%	0.00%	0.00%	9.50%	0.00%
MGM Resorts International	MGM	35.29	274	9,652	0.02%	0.00%	0.00%	25.00%	0.00%
Microchip Technology Incorporated	MCHP	53.58	540	28,957	0.05%	3.40%	0.00%	3.00%	0.00%

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Micron Technology, Inc.	MU	236.48	1,122	265,441	0.44%	0.19%	0.00%	44.00%	0.20%
Microsoft Corporation	MSFT	492.01	7,432	3,656,804	6.12%	0.74%	0.05%	12.50%	0.77%
Mid-America Apartment Communities, Inc.	MAA	135.89	117	15,910	0.03%	4.46%	0.00%	1.50%	0.00%
Moderna, Inc.	MRNA	25.98	391	Excl.	0.00%	0.00%	0.00%	NA	n/a
Mohawk Industries, Inc.	MHK	115.90	62	7,165	0.01%	0.00%	0.00%	3.50%	0.00%
Molina Healthcare, Inc.	MOH	148.26	51	7,621	0.01%	0.00%	0.00%	10.50%	0.00%
Molson Coors Beverage Company	TAP	46.51	198	9,192	0.02%	4.04%	0.00%	10.00%	0.00%
Mondelez International, Inc.	MDLZ	57.57	1,290	74,286	0.12%	3.47%	0.00%	7.50%	0.01%
Monolithic Power Systems, Inc.	MPWR	928.17	48	44,466	0.07%	0.67%	0.00%	12.00%	0.01%
Monster Beverage Corporation	MNST	74.99	977	73,267	0.12%	0.00%	0.00%	12.00%	0.01%
Moody's Corporation	MCO	490.78	178	87,553	0.15%	0.77%	0.00%	10.50%	0.02%
Morgan Stanley	MS	169.66	1,589	269,642	0.45%	2.36%	0.01%	12.50%	0.06%
Motorola Solutions, Inc.	MSI	369.68	167	61,572	0.10%	1.31%	0.00%	9.50%	0.01%
MSCI Inc.	MSCI	563.72	75	42,358	0.07%	1.28%	0.00%	8.50%	0.01%
Nasdaq, Inc.	NDAQ	90.92	571	51,915	0.09%	1.19%	0.00%	9.00%	0.01%
NetApp, Inc.	NTAP	111.56	198	22,096	0.04%	1.86%	0.00%	9.50%	0.00%
Netflix, Inc.	NFLX	107.58	4,237	455,851	0.76%	0.00%	0.00%	20.00%	0.15%
Newmont Corporation	NEM	90.73	1,091	99,010	0.17%	1.10%	0.00%	12.50%	0.02%
News Corporation	NWSA	25.68	560	14,372	0.02%	0.78%	0.00%	17.00%	0.00%
NextEra Energy, Inc.	NEE	86.29	2,083	179,708	0.30%	2.63%	0.01%	8.50%	0.03%
NIKE, Inc.	NKE	64.63	1,478	95,536	0.16%	2.54%	0.00%	3.50%	0.01%
NiSource Inc.	NI	44.13	477	21,059	0.04%	2.54%	0.00%	8.00%	0.00%
Nordson Corporation	NDSN	237.66	56	13,353	0.02%	1.38%	0.00%	10.00%	0.00%
Norfolk Southern Corporation	NSC	292.09	224	65,541	0.11%	1.85%	0.00%	9.50%	0.01%
Northern Trust Corporation	NTRS	131.34	189	24,839	0.04%	2.44%	0.00%	6.50%	0.00%
Northrop Grumman Corporation	NOC	572.25	143	81,672	0.14%	1.61%	0.00%	7.50%	0.01%
Norwegian Cruise Line Holdings Ltd.	NCLH	18.46	455	Excl.	0.00%	0.00%	0.00%	NA	n/a
NRG Energy, Inc.	NRG	169.49	192	32,481	0.05%	1.04%	0.00%	18.50%	0.01%
Nucor Corporation	NUE	159.49	229	36,501	0.06%	1.38%	0.00%	1.00%	0.00%
NVIDIA Corporation	NVDA	177.00	24,299	4,300,923	7.20%	0.02%	0.00%	31.50%	2.27%
NVR, Inc.	NVR	7,507.29	3	21,316	0.04%	0.00%	0.00%	1.50%	0.00%
NXP Semiconductors N.V.	NXPI	194.94	252	49,061	0.08%	2.08%	0.00%	7.50%	0.01%
Occidental Petroleum Corporation	OXY	42.00	985	41,379	0.07%	2.29%	0.00%	2.50%	0.00%
Old Dominion Freight Line, Inc.	ODFL	135.29	209	28,289	0.05%	0.83%	0.00%	4.50%	0.00%
Omnicom Group Inc.	OMC	71.62	193	13,821	0.02%	4.47%	0.00%	7.00%	0.00%
ON Semiconductor Corporation	ON	50.24	402	20,215	0.03%	0.00%	0.00%	4.00%	0.00%
ONEOK, Inc.	OKE	72.82	629	45,821	0.08%	5.66%	0.00%	10.50%	0.01%
Oracle Corporation	ORCL	201.95	2,851	575,718	0.96%	0.99%	0.01%	21.00%	0.20%
O'Reilly Automotive, Inc.	ORLY	101.70	844	85,845	0.14%	0.00%	0.00%	10.50%	0.02%
Otis Worldwide Corporation	OTIS	88.85	390	34,626	0.06%	1.89%	0.00%	9.50%	0.01%
PACCAR Inc	PCAR	105.42	525	55,367	0.09%	1.25%	0.00%	-1.00%	0.00%
Packaging Corporation of America	PKG	204.07	89	18,238	0.03%	2.45%	0.00%	9.00%	0.00%
Palantir Technologies Inc.	PLTR	168.45	2,383	Excl.	0.00%	0.00%	0.00%	NA	n/a
Palo Alto Networks, Inc.	PANW	190.13	697	132,521	0.22%	0.00%	0.00%	26.50%	0.06%
Paramount Skydance Corporation	PSKY	16.02	1,098	Excl.	0.00%	1.25%	0.00%	NA	n/a
Parker-Hannifin Corporation	PH	861.70	126	108,735	0.18%	0.84%	0.00%	10.50%	0.02%
Paychex, Inc.	PAYX	111.69	360	40,197	0.07%	3.87%	0.00%	8.00%	0.01%
Paycom Software, Inc.	PAYC	161.17	55	8,849	0.01%	0.93%	0.00%	11.00%	0.00%
PayPal Holdings, Inc.	PYPL	62.69	936	58,656	0.10%	0.89%	0.00%	13.50%	0.01%
Pentair plc	PNR	105.24	164	17,222	0.03%	0.95%	0.00%	12.00%	0.00%
PepsiCo, Inc.	PEP	148.74	1,383	205,733	0.34%	3.83%	0.01%	5.50%	0.02%
Pfizer Inc.	PFE	25.74	5,686	146,350	0.24%	6.68%	0.02%	6.00%	0.01%
PG&E Corporation	PCG	16.12	2,198	35,430	0.06%	0.62%	0.00%	9.00%	0.01%
Philip Morris International Inc.	PM	157.48	1,557	245,139	0.41%	3.73%	0.02%	5.00%	0.02%
Phillips 66	PSX	136.96	403	55,184	0.09%	3.50%	0.00%	0.00%	0.00%
Pinnacle West Capital Corporation	PNW	90.86	120	10,875	0.02%	4.01%	0.00%	5.00%	0.00%
Pool Corporation	POOL	243.60	37	9,074	0.02%	2.05%	0.00%	3.50%	0.00%
PPG Industries, Inc.	PPG	100.04	224	22,449	0.04%	2.84%	0.00%	6.00%	0.00%
PPL Corporation	PPL	36.90	740	27,296	0.05%	2.95%	0.00%	7.50%	0.00%
Principal Financial Group, Inc.	PFG	84.82	220	18,634	0.03%	3.73%	0.00%	4.00%	0.00%
Prologis, Inc.	PLD	128.53	929	119,387	0.20%	3.14%	0.01%	2.50%	0.00%
Prudential Financial, Inc.	PRU	108.25	350	37,877	0.06%	4.99%	0.00%	4.00%	0.00%
PTC Inc.	PTC	175.43	119	20,955	0.04%	0.00%	0.00%	29.00%	0.01%
Public Service Enterprise Group Incorporated	PEG	83.52	499	41,689	0.07%	3.02%	0.00%	7.00%	0.00%
Public Storage	PSA	274.54	175	48,172	0.08%	4.37%	0.00%	7.00%	0.01%
PulteGroup, Inc.	PHM	127.19	195	24,791	0.04%	0.82%	0.00%	5.00%	0.00%
Qnity Electronics, Inc.	Q	81.09	209	Excl.	0.00%	0.30%	0.00%	NA	n/a
QUALCOMM Incorporated	QCOM	168.09	1,070	179,804	0.30%	2.12%	0.01%	6.50%	0.02%
Quanta Services, Inc.	PWR	464.88	149	69,321	0.12%	0.09%	0.00%	18.00%	0.02%
Quest Diagnostics Incorporated	DGX	189.18	111	21,045	0.04%	1.69%	0.00%	8.00%	0.00%
Ralph Lauren Corporation	RL	367.33	61	22,275	0.04%	0.99%	0.00%	14.00%	0.01%
Raymond James Financial, Inc.	RJF	156.54	197	30,787	0.05%	1.28%	0.00%	11.00%	0.01%
Realty Income Corporation	O	57.61	920	52,996	0.09%	5.61%	0.00%	5.00%	0.00%
Regency Centers Corporation	REG	71.16	182	12,980	0.02%	4.24%	0.00%	6.50%	0.00%
Regeneron Pharmaceuticals, Inc.	REGN	780.19	103	80,047	0.13%	0.45%	0.00%	2.50%	0.00%
Regions Financial Corporation	RF	25.45	877	22,317	0.04%	4.17%	0.00%	7.00%	0.00%
Republic Services, Inc.	RSG	217.06	310	67,194	0.11%	1.15%	0.00%	10.00%	0.01%

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ResMed Inc.	RMD	255.83	146	37,343	0.06%	0.94%	0.00%	11.00%	0.01%
Revvity, Inc.	RVTY	104.41	113	11,838	0.02%	0.27%	0.00%	6.00%	0.00%
Robinhood Markets, Inc.	HOOD	128.49	899	Excl.	0.00%	0.00%	0.00%	NA	n/a
Rockwell Automation, Inc.	ROK	395.86	112	44,445	0.07%	1.39%	0.00%	8.00%	0.01%
Rollins, Inc.	ROL	61.48	481	29,581	0.05%	1.19%	0.00%	10.00%	0.00%
Roper Technologies, Inc.	ROP	446.22	108	48,030	0.08%	0.82%	0.00%	8.00%	0.01%
Ross Stores, Inc.	ROST	176.36	325	57,357	0.10%	0.92%	0.00%	8.00%	0.01%
Royal Caribbean Cruises Ltd.	RCL	266.25	273	Excl.	0.00%	1.50%	0.00%	NA	n/a
RTX Corporation	RTX	174.91	1,341	234,514	0.39%	1.56%	0.01%	14.00%	0.05%
S&P Global Inc.	SPGI	498.83	303	151,046	0.25%	0.77%	0.00%	9.00%	0.02%
Salesforce, Inc.	CRM	230.54	952	219,474	0.37%	0.72%	0.00%	21.00%	0.08%
Sandisk Corporation	SNDK	223.28	147	Excl.	0.00%	0.00%	0.00%	NA	n/a
SBA Communications Corporation	SBAC	194.27	107	20,699	0.03%	2.29%	0.00%	14.00%	0.00%
Seagate Technology Holdings plc	STX	276.69	218	60,283	0.10%	1.05%	0.00%	28.00%	0.03%
Sempra	SRE	94.72	653	61,822	0.10%	2.72%	0.00%	5.00%	0.01%
ServiceNow, Inc.	NOW	812.41	207	168,560	0.28%	0.00%	0.00%	25.50%	0.07%
Simon Property Group, Inc.	SPG	186.32	326	60,828	0.10%	4.72%	0.00%	3.50%	0.00%
Skyworks Solutions, Inc.	SWKS	65.95	149	Excl.	0.00%	4.31%	0.00%	NA	n/a
SLB N.V.	SLB	36.24	1,494	54,140	0.09%	3.15%	0.00%	11.00%	0.01%
Smurfit Westrock Plc	SW	35.69	521	Excl.	0.00%	4.83%	0.00%	NA	n/a
Snap-on Incorporated	SNA	340.05	52	17,685	0.03%	2.87%	0.00%	4.50%	0.00%
Solstice Advanced Materials, Inc.	SOLS	47.68	159	Excl.	0.00%	0.00%	0.00%	NA	n/a
Solventum Corporation	SOLV	85.26	173	Excl.	0.00%	0.00%	0.00%	NA	n/a
Southwest Airlines Co.	LUV	34.81	517	18,002	0.03%	2.07%	0.00%	20.50%	0.01%
Stanley Black & Decker, Inc.	SWK	71.52	155	11,077	0.02%	4.64%	0.00%	20.00%	0.00%
Starbucks Corporation	SBUX	87.11	1,137	99,053	0.17%	2.85%	0.00%	0.50%	0.00%
State Street Corporation	STT	119.02	279	33,244	0.06%	2.82%	0.00%	9.50%	0.01%
Steel Dynamics, Inc.	STLD	167.83	146	24,509	0.04%	1.19%	0.00%	0.50%	0.00%
STERIS plc	STE	266.28	98	26,135	0.04%	0.95%	0.00%	6.50%	0.00%
Stryker Corporation	SYK	371.18	382	141,948	0.24%	0.91%	0.00%	10.50%	0.02%
Super Micro Computer, Inc.	SMCI	33.85	597	20,207	0.03%	0.00%	0.00%	29.00%	0.01%
Synchrony Financial	SYF	77.36	360	27,863	0.05%	1.55%	0.00%	8.50%	0.00%
Synopsys, Inc.	SNPS	418.01	186	77,645	0.13%	0.00%	0.00%	12.00%	0.02%
Sysco Corporation	SYY	76.20	479	36,489	0.06%	2.83%	0.00%	8.00%	0.00%
T. Rowe Price Group, Inc.	TROW	102.38	218	22,343	0.04%	4.96%	0.00%	8.50%	0.00%
Take-Two Interactive Software, Inc.	TTWO	246.07	185	Excl.	0.00%	0.00%	0.00%	NA	n/a
Tapestry, Inc.	TPR	109.28	205	22,364	0.04%	1.46%	0.00%	9.50%	0.00%
Targa Resources Corp.	TRGP	175.31	215	37,632	0.06%	2.28%	0.00%	20.00%	0.01%
Target Corporation	TGT	90.62	453	41,033	0.07%	5.03%	0.00%	7.00%	0.00%
TE Connectivity plc	TEL	226.15	294	66,531	0.11%	1.23%	0.00%	8.50%	0.01%
Teledyne Technologies Incorporated	TDY	499.52	47	23,453	0.04%	0.00%	0.00%	9.50%	0.00%
Teradyne, Inc.	TER	181.89	157	28,485	0.05%	0.26%	0.00%	8.00%	0.00%
Tesla, Inc.	TSLA	430.17	3,326	1,430,668	2.39%	0.00%	0.00%	14.00%	0.34%
Texas Instruments Incorporated	TXN	168.27	909	152,894	0.26%	3.38%	0.01%	6.50%	0.02%
Texas Pacific Land Corporation	TPL	864.29	23	19,861	0.03%	0.74%	0.00%	10.00%	0.00%
Textron Inc.	TXT	83.16	176	14,655	0.02%	0.10%	0.00%	12.00%	0.00%
The AES Corporation	AES	14.06	712	10,012	0.02%	5.01%	0.00%	30.00%	0.01%
The Allstate Corporation	ALL	212.98	262	55,733	0.09%	1.88%	0.00%	27.50%	0.03%
The Bank of New York Mellon Corporation	BK	112.10	697	78,173	0.13%	1.89%	0.00%	11.50%	0.02%
The Boeing Company	BA	189.00	760	Excl.	0.00%	0.00%	0.00%	NA	n/a
The Campbell's Company	CPB	30.48	298	9,074	0.02%	5.12%	0.00%	6.00%	0.00%
The Charles Schwab Corporation	SCHW	92.73	1,777	164,775	0.28%	1.16%	0.00%	12.00%	0.03%
The Cigna Group	CI	277.28	267	74,069	0.12%	2.18%	0.00%	11.00%	0.01%
The Clorox Company	CLX	107.94	122	13,167	0.02%	4.60%	0.00%	9.00%	0.00%
The Coca-Cola Company	KO	73.12	4,302	314,534	0.53%	2.79%	0.01%	7.00%	0.04%
The Cooper Companies, Inc.	COO	77.93	199	15,493	0.03%	0.00%	0.00%	8.50%	0.00%
The Estée Lauder Companies Inc.	EL	94.07	360	33,899	0.06%	1.49%	0.00%	3.50%	0.00%
The Goldman Sachs Group, Inc.	GS	826.04	314	259,145	0.43%	1.94%	0.01%	12.00%	0.05%
The Hartford Insurance Group, Inc.	HIG	137.03	279	38,183	0.06%	1.75%	0.00%	7.00%	0.00%
The Hershey Company	HSY	188.08	203	38,140	0.06%	2.91%	0.00%	5.00%	0.00%
The Home Depot, Inc.	HD	356.92	996	355,318	0.59%	2.58%	0.02%	7.00%	0.04%
The J. M. Smucker Company	SJM	104.18	107	11,115	0.02%	4.22%	0.00%	4.50%	0.00%
The Kraft Heinz Company	KHC	25.51	1,184	30,195	0.05%	6.27%	0.00%	4.50%	0.00%
The Kroger Co.	KR	67.28	663	44,585	0.07%	2.08%	0.00%	6.00%	0.00%
The Mosaic Company	MOS	24.49	317	7,773	0.01%	3.59%	0.00%	-8.00%	0.00%
The PNC Financial Services Group, Inc.	PNC	190.72	392	74,792	0.13%	3.57%	0.00%	8.50%	0.01%
The Procter & Gamble Company	PG	148.16	2,337	346,210	0.58%	2.85%	0.02%	4.50%	0.03%
The Progressive Corporation	PGR	228.79	586	134,162	0.22%	0.17%	0.00%	16.50%	0.04%
The Sherwin-Williams Company	SHW	343.69	246	84,708	0.14%	0.92%	0.00%	10.50%	0.01%
The Southern Company	SO	91.12	1,101	100,333	0.17%	3.25%	0.01%	6.50%	0.01%
The TJX Companies, Inc.	TJX	151.92	1,113	169,078	0.28%	1.12%	0.00%	12.50%	0.04%
The Trade Desk, Inc.	TTD	39.56	484	19,131	0.03%	0.00%	0.00%	26.00%	0.01%
The Travelers Companies, Inc.	TRV	292.86	223	65,326	0.11%	1.50%	0.00%	12.00%	0.01%
The Walt Disney Company	DIS	104.47	1,785	186,509	0.31%	1.44%	0.00%	25.00%	0.08%
The Williams Companies, Inc.	WMB	60.93	1,221	74,409	0.12%	3.28%	0.00%	9.50%	0.01%
Thermo Fisher Scientific Inc.	TMO	590.83	376	221,980	0.37%	0.29%	0.00%	8.00%	0.03%
TKO Group Holdings, Inc.	TKO	193.89	79	Excl.	0.00%	1.57%	0.00%	NA	n/a

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T-Mobile US, Inc.	TMUS	209.01	1,119	233,779	0.39%	1.95%	0.01%	17.50%	0.07%
Tractor Supply Company	TSCO	54.78	528	28,946	0.05%	1.68%	0.00%	8.50%	0.00%
Trane Technologies plc	TT	421.48	222	93,459	0.16%	0.89%	0.00%	12.50%	0.02%
TransDigm Group Incorporated	TDG	1,360.17	56	76,603	0.13%	0.00%	0.00%	13.00%	0.02%
Trimble Inc.	TRMB	81.42	238	19,372	0.03%	0.00%	0.00%	6.50%	0.00%
Truist Financial Corporation	TFC	46.50	1,279	59,485	0.10%	4.47%	0.00%	5.00%	0.00%
Tyler Technologies, Inc.	TYL	469.62	43	20,207	0.03%	0.00%	0.00%	10.50%	0.00%
Tyson Foods, Inc.	TSN	58.05	353	20,495	0.03%	3.51%	0.00%	4.00%	0.00%
U.S. Bancorp	USB	49.05	1,554	76,245	0.13%	4.24%	0.01%	7.00%	0.01%
Uber Technologies, Inc.	UBER	87.54	2,078	Excl.	0.00%	0.00%	0.00%	NA	n/a
UDR, Inc.	UDR	36.42	330	12,036	0.02%	4.72%	0.00%	7.50%	0.00%
Ulta Beauty, Inc.	ULTA	538.83	45	24,160	0.04%	0.00%	0.00%	5.50%	0.00%
Union Pacific Corporation	UNP	231.83	593	137,512	0.23%	2.38%	0.01%	6.50%	0.01%
United Airlines Holdings, Inc.	UAL	101.96	324	33,008	0.06%	0.00%	0.00%	13.00%	0.01%
United Parcel Service, Inc.	UPS	95.79	848	81,267	0.14%	6.85%	0.01%	0.50%	0.00%
United Rentals, Inc.	URI	815.18	64	51,870	0.09%	0.88%	0.00%	9.50%	0.01%
UnitedHealth Group Incorporated	UNH	329.77	906	298,718	0.50%	2.68%	0.01%	3.00%	0.02%
Universal Health Services, Inc.	UHS	243.63	62	15,223	0.03%	0.33%	0.00%	13.50%	0.00%
Valero Energy Corporation	VLO	176.76	305	53,913	0.09%	2.56%	0.00%	-8.00%	-0.01%
Ventas, Inc.	VTR	80.63	470	37,875	0.06%	2.38%	0.00%	23.00%	0.01%
Veralto Corporation	VLTO	101.22	248	25,133	0.04%	0.43%	0.00%	6.00%	0.00%
VeriSign, Inc.	VRSN	251.99	93	23,359	0.04%	1.22%	0.00%	10.00%	0.00%
Verisk Analytics, Inc.	VRSK	225.07	139	31,369	0.05%	0.80%	0.00%	8.00%	0.00%
Verizon Communications Inc.	VZ	41.11	4,216	173,337	0.29%	6.71%	0.02%	0.50%	0.00%
Vertex Pharmaceuticals Incorporated	VRTX	433.61	254	110,015	0.18%	0.00%	0.00%	9.00%	0.02%
Viatris Inc.	VTRS	10.69	1,152	12,312	0.02%	4.49%	0.00%	0.00%	0.00%
VICI Properties Inc.	VICI	28.82	1,069	30,803	0.05%	6.25%	0.00%	8.00%	0.00%
Visa Inc.	V	334.44	1,914	640,150	1.07%	0.80%	0.01%	10.50%	0.11%
Vistra Corp.	VST	178.86	339	60,602	0.10%	0.51%	0.00%	30.50%	0.03%
Vulcan Materials Company	VMC	297.24	132	39,275	0.07%	0.66%	0.00%	7.00%	0.00%
W. R. Berkley Corporation	WRB	77.69	380	29,524	0.05%	0.46%	0.00%	13.50%	0.01%
W.W. Grainger, Inc.	GWW	948.63	48	45,107	0.08%	0.95%	0.00%	5.00%	0.00%
Walmart Inc.	WMT	110.51	7,973	881,080	1.47%	0.85%	0.01%	10.00%	0.15%
Warner Bros. Discovery, Inc.	WBD	24.00	2,478	Excl.	0.00%	0.00%	0.00%	NA	n/a
Waste Management, Inc.	WM	217.87	403	87,773	0.15%	1.51%	0.00%	7.50%	0.01%
Waters Corporation	WAT	403.42	60	24,018	0.04%	0.00%	0.00%	7.50%	0.00%
WEC Energy Group, Inc.	WEC	112.07	325	36,456	0.06%	3.19%	0.00%	6.00%	0.00%
Wells Fargo & Company	WFC	85.85	3,139	269,490	0.45%	2.10%	0.01%	8.00%	0.04%
Welltower Inc.	WELL	208.22	686	142,907	0.24%	1.42%	0.00%	23.50%	0.06%
West Pharmaceutical Services, Inc.	WST	277.25	72	19,946	0.03%	0.32%	0.00%	5.00%	0.00%
Western Digital Corporation	WDC	163.33	342	Excl.	0.00%	0.31%	0.00%	NA	n/a
Westinghouse Air Brake Technologies Corporatic	WAB	208.55	171	35,653	0.06%	0.48%	0.00%	15.00%	0.01%
Weyerhaeuser Company	WY	22.21	721	16,010	0.03%	3.78%	0.00%	6.50%	0.00%
Williams-Sonoma, Inc.	WSM	180.01	119	21,490	0.04%	1.47%	0.00%	5.00%	0.00%
Willis Towers Watson Public Limited Company	WTW	321.00	96	30,735	0.05%	1.13%	0.00%	9.00%	0.00%
Workday, Inc.	WDAY	215.62	263	56,708	0.09%	0.00%	0.00%	12.00%	0.01%
Wynn Resorts, Limited	WYNN	128.68	103	13,248	0.02%	0.78%	0.00%	27.00%	0.01%
Xcel Energy Inc.	XEL	82.11	592	48,571	0.08%	2.78%	0.00%	7.00%	0.01%
Xylem Inc.	XYL	140.67	243	34,249	0.06%	1.14%	0.00%	10.00%	0.01%
Yum! Brands, Inc.	YUM	153.21	278	42,539	0.07%	1.85%	0.00%	10.00%	0.01%
Zebra Technologies Corporation	ZBRA	252.75	51	12,804	0.02%	0.00%	0.00%	6.50%	0.00%
Zimmer Biomet Holdings, Inc.	ZBH	97.52	198	19,329	0.03%	0.98%	0.00%	5.00%	0.00%
Zoetis Inc.	ZTS	128.18	441	56,488	0.09%	1.56%	0.00%	7.50%	0.01%

Notes:
[4] Source: S&P Capital IQ
[5] Source: S&P Capital IQ
[6] Equals [4] x [5]
[7] Equals [6] / Sum of Column [6]
[8] Source: S&P Capital IQ
[9] Equals [7] x [8]
[10] Source: Value Line
[11] Equals [7] x [10]

MARKET RISK PREMIUM DERIVED FROM S&P 500 - FERC METHODOLOGY

[1] Estimate of the S&P 500 Dividend Yield	1.34%
[2] Estimate of the S&P 500 Growth Rate	10.21%
[3] S&P 500 Estimated Required Market Return	11.62%

Notes:
[1] Sum of [9]
[2] Sum of [11]
[3] Equals ([1] x (1 + 0.5 x [2])) + [2]

STANDARD AND POOR'S 500 INDEX

		[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]
Name	Ticker	Price	Shares Outstanding	Market Capitalization	Weight in Index	Current Dividend Yield	Cap-Weighted Dividend Yield	Value Line Long-Term Growth Est.	Cap-Weighted Long-Term Growth Est.
3M Company	MMM	172.05	531	Excl.	Excl.	1.70%	n/a	38.50%	n/a
A. O. Smith Corporation	AOS	65.98	139	9,187	0.02%	2.18%	0.00%	7.50%	0.00%
Abbott Laboratories	ABT	128.90	1,739	224,141	0.49%	1.83%	0.01%	6.00%	0.03%
AbbVie Inc.	ABBV	227.70	1,767	402,433	0.88%	3.04%	0.03%	7.00%	0.06%
Accenture plc	ACN	250.00	620	155,035	0.34%	2.43%	0.01%	12.50%	0.04%
Adobe Inc.	ADBE	320.13	419	134,006	0.29%	0.00%	0.00%	14.50%	0.04%
Advanced Micro Devices, Inc.	AMD	217.53	1,628	354,148	0.77%	0.00%	0.00%	19.00%	0.15%
Aflac Incorporated	AFL	110.31	524	57,815	0.13%	2.21%	0.00%	8.50%	0.01%
Agilent Technologies, Inc.	A	153.50	283	43,449	0.09%	0.66%	0.00%	7.50%	0.01%
Air Products and Chemicals, Inc.	APD	261.05	223	58,107	0.13%	2.74%	0.00%	10.50%	0.01%
Airbnb, Inc.	ABNB	116.99	606	Excl.	Excl.	0.00%	n/a	23.00%	n/a
Akamai Technologies, Inc.	AKAM	89.52	144	12,879	0.03%	0.00%	0.00%	8.00%	0.00%
Albemarle Corporation	ALB	129.99	118	15,300	0.03%	1.25%	0.00%	4.50%	0.00%
Alexandria Real Estate Equities, Inc.	ARE	53.67	173	Excl.	Excl.	9.84%	n/a	-1.00%	n/a
Align Technology, Inc.	ALGN	147.19	72	10,561	0.02%	0.00%	0.00%	11.50%	0.00%
Allegion plc	ALLE	166.03	86	14,284	0.03%	1.21%	0.00%	7.00%	0.00%
Alliant Energy Corporation	LNT	69.47	257	17,858	0.04%	2.92%	0.00%	6.00%	0.00%
Alphabet Inc.	GOOGL	320.18	12,067	3,863,612	8.44%	0.26%	0.02%	12.00%	1.01%
Altria Group, Inc.	MO	59.01	1,679	99,058	0.22%	7.19%	0.02%	6.00%	0.01%
Amazon.com, Inc.	AMZN	233.22	10,690	Excl.	Excl.	0.00%	n/a	23.00%	n/a
Amcor plc	AMCR	8.52	2,305	19,637	0.04%	6.02%	0.00%	11.50%	0.00%
Ameren Corporation	AEE	106.35	270	28,767	0.06%	2.67%	0.00%	6.50%	0.00%
American Electric Power Company, Inc.	AEP	123.77	534	66,105	0.14%	3.07%	0.00%	6.50%	0.01%
American Express Company	AXP	365.27	689	251,617	0.55%	0.90%	0.00%	11.00%	0.06%
American International Group, Inc.	AIG	76.16	540	41,094	0.09%	2.36%	0.00%	15.00%	0.01%
American Tower Corporation	AMT	181.27	468	84,861	0.19%	3.75%	0.01%	10.00%	0.02%
American Water Works Company, Inc.	AWK	130.07	195	25,380	0.06%	2.54%	0.00%	4.50%	0.00%
Ameriprise Financial, Inc.	AMP	455.74	93	42,341	0.09%	1.40%	0.00%	9.00%	0.01%
AMETEK, Inc.	AME	197.89	230	45,555	0.10%	0.63%	0.00%	8.50%	0.01%
Amgen Inc.	AMGN	345.46	538	186,024	0.41%	2.76%	0.01%	5.50%	0.02%
Amphenol Corporation	APH	140.90	1,224	172,469	0.38%	0.71%	0.00%	18.50%	0.07%
Analog Devices, Inc.	ADI	265.34	490	129,925	0.28%	1.49%	0.00%	9.00%	0.03%
Aon plc	AON	353.92	215	76,070	0.17%	0.82%	0.00%	11.50%	0.02%
APA Corporation	APA	24.97	355	8,856	0.02%	4.00%	0.00%	3.00%	0.00%
Apollo Global Management, Inc.	APO	131.85	580	Excl.	Excl.	1.55%	n/a	24.50%	n/a
Apple Inc.	AAPL	278.85	14,776	4,120,386	9.01%	0.37%	0.03%	10.00%	0.90%
Applied Materials, Inc.	AMAT	252.25	797	200,953	0.44%	0.73%	0.00%	8.00%	0.04%
AppLovin Corporation	APP	599.48	338	Excl.	Excl.	0.00%	n/a	53.00%	n/a
Aptiv PLC	APTV	77.55	216	Excl.	Excl.	0.00%	n/a	28.50%	n/a
Arch Capital Group Ltd.	ACGL	93.92	361	33,914	0.07%	0.00%	0.00%	10.00%	0.01%
Archer-Daniels-Midland Company	ADM	60.74	481	29,190	0.06%	3.36%	0.00%	2.00%	0.00%
Arista Networks Inc	ANET	130.68	1,259	164,563	0.36%	0.00%	0.00%	16.50%	0.06%
Arthur J. Gallagher & Co.	AJG	247.62	257	Excl.	Excl.	1.05%	n/a	25.00%	n/a
Assurant, Inc.	AIZ	228.16	50	11,427	0.02%	1.54%	0.00%	9.50%	0.00%
AT&T Inc.	T	26.02	7,089	184,467	0.40%	4.27%	0.02%	6.50%	0.03%
Atmos Energy Corporation	ATO	176.37	162	28,518	0.06%	2.27%	0.00%	8.50%	0.01%
Autodesk, Inc.	ADSK	303.34	212	64,182	0.14%	0.00%	0.00%	10.50%	0.01%
Automatic Data Processing, Inc.	ADP	255.30	404	103,256	0.23%	2.66%	0.01%	6.00%	0.01%
AutoZone, Inc.	AZO	3,954.33	17	65,771	0.14%	0.00%	0.00%	7.50%	0.01%
AvalonBay Communities, Inc.	AVB	181.94	141	25,731	0.06%	3.85%	0.00%	6.50%	0.00%
Avery Dennison Corporation	AVY	172.37	77	13,323	0.03%	2.18%	0.00%	2.00%	0.00%
Axon Enterprise, Inc.	AXON	540.14	79	Excl.	Excl.	0.00%	n/a	29.00%	n/a
Baker Hughes Company	BKR	50.20	987	49,536	0.11%	1.83%	0.00%	20.00%	0.02%
Ball Corporation	BALL	49.53	268	13,273	0.03%	1.62%	0.00%	10.50%	0.00%
Bank of America Corporation	BAC	53.65	7,302	391,779	0.86%	2.09%	0.02%	8.50%	0.07%
Baxter International Inc.	BAX	18.74	514	9,633	0.02%	0.21%	0.00%	0.50%	0.00%
Becton, Dickinson and Company	BDX	194.02	285	55,377	0.12%	2.16%	0.00%	7.50%	0.01%
Berkshire Hathaway Inc.	BRK.A	770,100.00	1	1,107,928	2.42%	0.00%	0.00%	9.50%	0.23%
Best Buy Co., Inc.	BBY	79.28	210	16,657	0.04%	4.79%	0.00%	3.00%	0.00%
Biogen Inc.	BIIB	182.09	147	26,713	0.06%	0.00%	0.00%	1.00%	0.00%
Bio-Techne Corporation	TECH	64.51	156	10,051	0.02%	0.50%	0.00%	18.00%	0.00%
BlackRock, Inc.	BLK	1,047.30	155	162,490	0.36%	1.99%	0.01%	11.00%	0.04%

STANDARD AND POOR'S 500 INDEX

Name	Ticker	[4] Price	[5] Shares Outstanding	[6] Market Capitalization	[7] Weight in Index	[8] Current Dividend Yield	[9] Cap-Weighted Dividend Yield	[10] Value Line Long-Term Growth Est.	[11] Cap-Weighted Long-Term Growth Est.
Blackstone Inc.	BX	146.42	783	Excl.	Excl.	3.52%	n/a	26.00%	n/a
Block, Inc.	XYZ	66.80	608	Excl.	Excl.	0.00%	n/a	NA	n/a
Booking Holdings Inc.	BKNG	4,914.69	32	158,419	0.35%	0.78%	0.00%	14.50%	0.05%
Boston Scientific Corporation	BSX	101.58	1,482	150,586	0.33%	0.00%	0.00%	13.00%	0.04%
Bristol-Myers Squibb Company	BMY	49.20	2,036	Excl.	Excl.	5.04%	n/a	27.50%	n/a
Broadcom Inc.	AVGO	402.96	4,722	Excl.	Excl.	0.59%	n/a	24.50%	n/a
Broadridge Financial Solutions, Inc.	BR	228.09	117	26,624	0.06%	1.71%	0.00%	9.50%	0.01%
Brown & Brown, Inc.	BRO	80.43	341	27,460	0.06%	0.82%	0.00%	11.00%	0.01%
Brown-Forman Corporation	BF.B	28.98	473	13,700	0.03%	3.19%	0.00%	7.50%	0.00%
Builders FirstSource, Inc.	BLDR	112.23	111	Excl.	Excl.	0.00%	n/a	-1.50%	n/a
Bunge Global SA	BG	96.07	193	18,576	0.04%	2.91%	0.00%	1.50%	0.00%
BXP, Inc.	BXP	72.36	158	11,467	0.03%	3.87%	0.00%	1.50%	0.00%
C.H. Robinson Worldwide, Inc.	CHRW	158.87	118	18,768	0.04%	1.59%	0.00%	10.50%	0.00%
Cadence Design Systems, Inc.	CDNS	311.84	272	84,883	0.19%	0.00%	0.00%	12.00%	0.02%
Camden Property Trust	CPT	106.34	106	Excl.	Excl.	3.95%	n/a	-6.50%	n/a
Capital One Financial Corporation	COF	219.07	636	139,270	0.30%	1.46%	0.00%	10.00%	0.03%
Cardinal Health, Inc.	CAH	212.26	238	50,432	0.11%	0.96%	0.00%	13.00%	0.01%
Carnival Corporation & plc	CCL	25.78	1,313	Excl.	Excl.	0.00%	n/a	NA	n/a
Carrier Global Corporation	CARR	54.88	842	46,220	0.10%	1.64%	0.00%	12.00%	0.01%
Caterpillar Inc.	CAT	575.76	468	269,444	0.59%	1.05%	0.01%	8.50%	0.05%
Cboe Global Markets, Inc.	CBOE	258.17	105	27,016	0.06%	1.12%	0.00%	13.00%	0.01%
CBRE Group, Inc.	CBRE	161.83	293	47,438	0.10%	0.00%	0.00%	9.00%	0.01%
CDW Corporation	CDW	144.22	130	18,777	0.04%	1.75%	0.00%	6.50%	0.00%
Cencora, Inc.	COR	368.93	194	71,570	0.16%	0.65%	0.00%	11.00%	0.02%
Centene Corporation	CNC	39.34	492	19,336	0.04%	0.00%	0.00%	9.50%	0.00%
CenterPoint Energy, Inc.	CNP	39.98	653	26,102	0.06%	2.20%	0.00%	7.00%	0.00%
CF Industries Holdings, Inc.	CF	78.70	156	Excl.	Excl.	2.54%	n/a	NA	n/a
Charles River Laboratories International, Inc.	CRL	178.14	49	8,767	0.02%	0.00%	0.00%	5.00%	0.00%
Charter Communications, Inc.	CHTR	200.12	129	25,897	0.06%	0.00%	0.00%	6.50%	0.00%
Chevron Corporation	CVX	151.13	2,014	304,304	0.67%	4.53%	0.03%	1.50%	0.01%
Chipotle Mexican Grill, Inc.	CMG	34.52	1,322	45,645	0.10%	0.00%	0.00%	17.00%	0.02%
Chubb Limited	CB	296.18	394	116,562	0.25%	1.29%	0.00%	11.00%	0.03%
Church & Dwight Co., Inc.	CHD	85.16	240	20,449	0.04%	1.39%	0.00%	8.00%	0.00%
Cincinnati Financial Corporation	CINF	167.59	156	26,147	0.06%	2.08%	0.00%	11.00%	0.01%
Cintas Corporation	CTAS	186.02	402	74,755	0.16%	0.97%	0.00%	13.50%	0.02%
Cisco Systems, Inc.	CSCO	76.94	3,951	303,997	0.66%	2.13%	0.01%	5.50%	0.04%
Citigroup Inc.	C	103.60	1,789	185,368	0.41%	2.32%	0.01%	3.00%	0.01%
Citizens Financial Group, Inc.	CFG	54.10	429	23,235	0.05%	3.40%	0.00%	10.50%	0.01%
CME Group Inc.	CME	281.46	361	101,494	0.22%	1.78%	0.00%	5.50%	0.01%
CMS Energy Corporation	CMS	75.44	304	22,958	0.05%	2.88%	0.00%	8.50%	0.00%
Cognizant Technology Solutions Corporation	CTSH	77.71	483	37,506	0.08%	1.60%	0.00%	9.00%	0.01%
Coinbase Global, Inc.	COIN	272.82	270	Excl.	Excl.	0.00%	n/a	NA	n/a
Colgate-Palmolive Company	CL	80.39	806	64,800	0.14%	2.59%	0.00%	10.00%	0.01%
Comcast Corporation	CMCSA	26.69	3,644	97,256	0.21%	4.95%	0.01%	7.50%	0.02%
Conagra Brands, Inc.	CAG	17.85	478	8,539	0.02%	7.84%	0.00%	1.00%	0.00%
ConocoPhillips	COP	88.69	1,236	109,596	0.24%	3.79%	0.01%	1.50%	0.00%
Consolidated Edison, Inc.	ED	100.36	361	36,223	0.08%	3.39%	0.00%	6.00%	0.00%
Constellation Brands, Inc.	STZ	136.38	174	23,736	0.05%	2.99%	0.00%	3.50%	0.00%
Constellation Energy Corporation	CEG	364.36	312	113,786	0.25%	0.43%	0.00%	18.00%	0.04%
Copart, Inc.	CPRT	38.98	968	37,733	0.08%	0.00%	0.00%	8.00%	0.01%
Corning Incorporated	GLW	84.20	857	Excl.	Excl.	1.33%	n/a	23.00%	n/a
Corpay, Inc.	CPAY	295.80	70	20,694	0.05%	0.00%	0.00%	12.50%	0.01%
Corteva, Inc.	CTVA	67.47	676	45,592	0.10%	1.07%	0.00%	9.50%	0.01%
CoStar Group, Inc.	CSGP	68.80	424	Excl.	Excl.	0.00%	n/a	21.50%	n/a
Costco Wholesale Corporation	COST	913.59	443	404,884	0.88%	0.57%	0.01%	11.50%	0.10%
Coterra Energy Inc.	CTRA	26.84	761	20,435	0.04%	3.28%	0.00%	7.00%	0.00%
CrowdStrike Holdings, Inc.	CRWD	509.16	251	Excl.	Excl.	0.00%	n/a	NA	n/a
Crown Castle Inc.	CCI	91.28	435	Excl.	Excl.	4.66%	n/a	NA	n/a
CSX Corporation	CSX	35.36	1,862	65,841	0.14%	1.47%	0.00%	7.00%	0.01%
Cummins Inc.	CMI	497.98	138	68,739	0.15%	1.61%	0.00%	8.00%	0.01%
CVS Health Corporation	CVS	80.36	1,269	102,012	0.22%	3.31%	0.01%	2.50%	0.01%
D.R. Horton, Inc.	DHI	159.01	292	46,441	0.10%	1.13%	0.00%	2.50%	0.00%
Danaher Corporation	DHR	226.78	706	160,186	0.35%	0.56%	0.00%	4.50%	0.02%
Darden Restaurants, Inc.	DRI	179.58	116	20,888	0.05%	3.34%	0.00%	11.00%	0.01%
Datadog, Inc.	DDOG	160.01	351	Excl.	Excl.	0.00%	n/a	21.50%	n/a
DaVita Inc.	DVA	119.68	71	8,449	0.02%	0.00%	0.00%	10.50%	0.00%
Dayforce Inc.	DAY	69.10	160	Excl.	Excl.	0.00%	n/a	49.00%	n/a
Deckers Outdoor Corporation	DECK	88.03	146	12,830	0.03%	0.00%	0.00%	12.00%	0.00%
Deere & Company	DE	464.49	270	125,565	0.27%	1.40%	0.00%	1.00%	0.00%
Dell Technologies Inc.	DELL	133.35	670	89,371	0.20%	1.57%	0.00%	10.50%	0.02%
Delta Air Lines, Inc.	DAL	64.10	649	41,578	0.09%	1.17%	0.00%	9.50%	0.01%
Devon Energy Corporation	DVN	37.06	627	Excl.	Excl.	2.59%	n/a	-1.50%	n/a
DexCom, Inc.	DXCM	63.47	390	Excl.	Excl.	0.00%	n/a	22.50%	n/a
Diamondback Energy, Inc.	FANG	152.59	286	43,701	0.10%	2.62%	0.00%	1.50%	0.00%
Digital Realty Trust, Inc.	DLR	160.12	344	55,001	0.12%	3.05%	0.00%	9.50%	0.01%
Dollar General Corporation	DG	109.49	220	24,099	0.05%	2.16%	0.00%	1.50%	0.00%
Dollar Tree, Inc.	DLTR	110.81	202	Excl.	Excl.	0.00%	n/a	22.00%	n/a

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Dominion Energy, Inc.	D	62.77	854	53,600	0.12%	4.25%	0.00%	6.00%	0.01%
Domino's Pizza, Inc.	DPZ	419.63	34	14,178	0.03%	1.66%	0.00%	13.50%	0.00%
DoorDash, Inc.	DASH	198.37	431	Excl.	Excl.	0.00%	n/a	NA	n/a
Dover Corporation	DOV	185.28	137	25,412	0.06%	1.12%	0.00%	5.00%	0.00%
Dow Inc.	DOW	23.85	711	16,952	0.04%	5.87%	0.00%	2.50%	0.00%
DTE Energy Company	DTE	137.03	208	28,459	0.06%	3.18%	0.00%	4.50%	0.00%
Duke Energy Corporation	DUK	123.94	778	96,383	0.21%	3.44%	0.01%	6.00%	0.01%
DuPont de Nemours, Inc.	DD	39.77	419	16,663	0.04%	2.01%	0.00%	10.50%	0.00%
Eaton Corporation plc	ETN	345.89	388	134,344	0.29%	1.20%	0.00%	11.00%	0.03%
eBay Inc.	EBAY	82.79	452	37,421	0.08%	1.40%	0.00%	10.50%	0.01%
Ecolab Inc.	ECL	275.16	283	77,935	0.17%	0.94%	0.00%	8.00%	0.01%
Edison International	EIX	58.89	385	22,660	0.05%	5.62%	0.00%	6.50%	0.00%
Edwards Lifesciences Corporation	EW	86.67	580	50,295	0.11%	0.00%	0.00%	8.00%	0.01%
Electronic Arts Inc.	EA	202.03	249	50,387	0.11%	0.38%	0.00%	11.50%	0.01%
Elevance Health, Inc.	ELV	338.26	222	75,174	0.16%	2.02%	0.00%	8.50%	0.01%
Eli Lilly and Company	LLY	1,075.47	895	Excl.	Excl.	0.56%	n/a	26.50%	n/a
EMCOR Group, Inc.	EME	615.07	45	27,534	0.06%	0.16%	0.00%	16.50%	0.01%
Emerson Electric Co.	EMR	133.38	562	74,933	0.16%	1.66%	0.00%	11.00%	0.02%
Entergy Corporation	ETR	97.52	452	44,107	0.10%	2.63%	0.00%	3.00%	0.00%
EOG Resources, Inc.	EOG	107.85	543	58,519	0.13%	3.78%	0.00%	3.50%	0.00%
EPAM Systems, Inc.	EPAM	187.00	55	Excl.	Excl.	0.00%	n/a	20.50%	n/a
EQT Corporation	EQT	60.86	624	37,981	0.08%	1.08%	0.00%	11.00%	0.01%
Equifax Inc.	EFX	212.37	122	25,993	0.06%	0.94%	0.00%	7.50%	0.00%
Equinix, Inc.	EQIX	753.31	98	73,965	0.16%	2.49%	0.00%	15.00%	0.02%
Equity Residential	EQR	61.75	380	23,494	0.05%	4.49%	0.00%	4.00%	0.00%
Erie Indemnity Company	ERIE	295.49	52	15,451	0.03%	1.85%	0.00%	16.00%	0.01%
Essex Property Trust, Inc.	ESS	263.62	64	16,978	0.04%	3.90%	0.00%	7.50%	0.00%
Everest Group, Ltd.	EG	314.29	42	13,193	0.03%	2.55%	0.00%	6.00%	0.00%
Evergy, Inc.	EVRG	77.65	230	17,876	0.04%	3.58%	0.00%	7.50%	0.00%
Eversource Energy	ES	67.18	375	25,205	0.06%	4.48%	0.00%	5.50%	0.00%
Exelon Corporation	EXC	47.12	1,010	47,605	0.10%	3.40%	0.00%	5.50%	0.01%
Expand Energy Corporation	EXE	121.93	238	Excl.	Excl.	1.89%	n/a	NA	n/a
Expedia Group, Inc.	EXPE	255.69	123	Excl.	Excl.	0.63%	n/a	39.00%	n/a
Expeditors International of Washington, Inc.	EXPD	146.90	134	19,688	0.04%	1.05%	0.00%	1.00%	0.00%
Extra Space Storage Inc.	EXR	133.17	212	Excl.	Excl.	4.87%	n/a	-1.00%	n/a
Exxon Mobil Corporation	XOM	115.92	4,217	Excl.	Excl.	3.55%	n/a	-3.00%	n/a
F5, Inc.	FFIV	239.16	58	13,893	0.03%	0.00%	0.00%	9.50%	0.00%
FactSet Research Systems Inc.	FDS	277.27	37	10,375	0.02%	1.59%	0.00%	7.50%	0.00%
Fair Isaac Corporation	FICO	1,805.83	24	Excl.	Excl.	0.00%	n/a	21.50%	n/a
Fastenal Company	FAST	40.40	1,148	46,381	0.10%	2.18%	0.00%	8.00%	0.01%
Federal Realty Investment Trust	FRT	98.73	86	8,517	0.02%	4.58%	0.00%	2.00%	0.00%
FedEx Corporation	FDX	275.68	236	65,048	0.14%	2.10%	0.00%	6.50%	0.01%
Fidelity National Information Services, Inc.	FIS	65.77	518	34,059	0.07%	2.43%	0.00%	7.00%	0.01%
Fifth Third Bancorp	FITB	43.46	661	28,728	0.06%	3.68%	0.00%	7.50%	0.00%
First Solar, Inc.	FSLR	272.92	107	Excl.	Excl.	0.00%	n/a	26.00%	n/a
FirstEnergy Corp.	FE	47.72	578	27,566	0.06%	3.73%	0.00%	5.00%	0.00%
Fiserv, Inc.	FISV	61.47	538	33,062	0.07%	0.00%	0.00%	10.00%	0.01%
Ford Motor Company	F	13.28	3,984	Excl.	Excl.	4.52%	n/a	20.50%	n/a
Fortinet, Inc.	FTNT	81.13	744	60,332	0.13%	0.00%	0.00%	12.50%	0.02%
Fortive Corporation	FTV	53.48	318	16,986	0.04%	0.45%	0.00%	6.50%	0.00%
Fox Corporation	FOXA	65.50	444	29,078	0.06%	0.85%	0.00%	6.00%	0.00%
Franklin Resources, Inc.	BEN	22.59	521	11,769	0.03%	5.67%	0.00%	4.00%	0.00%
Freeport-McMoRan Inc.	FCX	42.98	1,436	61,716	0.13%	1.40%	0.00%	18.00%	0.02%
Garmin Ltd.	GRMN	195.32	192	37,567	0.08%	1.84%	0.00%	7.00%	0.01%
Gartner, Inc.	IT	232.74	72	16,775	0.04%	0.00%	0.00%	6.50%	0.00%
GE HealthCare Technologies Inc.	GEHC	79.99	456	Excl.	Excl.	0.18%	n/a	NA	n/a
GE Vernova Inc.	GEV	599.77	271	Excl.	Excl.	0.17%	n/a	NA	n/a
Gen Digital Inc.	GEN	26.37	617	16,263	0.04%	1.90%	0.00%	10.50%	0.00%
Generac Holdings Inc.	GNRC	151.63	59	8,898	0.02%	0.00%	0.00%	18.50%	0.00%
General Dynamics Corporation	GD	341.63	270	92,143	0.20%	1.76%	0.00%	13.50%	0.03%
General Electric Company	GE	298.45	1,055	Excl.	Excl.	0.48%	n/a	22.00%	n/a
General Mills, Inc.	GIS	47.35	533	25,257	0.06%	5.15%	0.00%	1.00%	0.00%
General Motors Company	GM	73.52	937	68,919	0.15%	0.82%	0.00%	9.50%	0.01%
Genuine Parts Company	GPC	130.40	139	18,140	0.04%	3.16%	0.00%	2.00%	0.00%
Gilead Sciences, Inc.	GILD	125.84	1,241	156,127	0.34%	2.51%	0.01%	16.00%	0.05%
Global Payments Inc.	GPN	75.76	237	17,936	0.04%	1.32%	0.00%	7.00%	0.00%
Globe Life Inc.	GL	134.73	80	10,725	0.02%	0.80%	0.00%	10.00%	0.00%
GoDaddy Inc.	GDDY	127.86	135	17,279	0.04%	0.00%	0.00%	12.50%	0.00%
Halliburton Company	HAL	26.22	842	22,067	0.05%	2.59%	0.00%	7.50%	0.00%
Hasbro, Inc.	HAS	82.60	140	11,592	0.03%	3.39%	0.00%	8.50%	0.00%
HCA Healthcare, Inc.	HCA	508.29	228	115,989	0.25%	0.57%	0.00%	11.50%	0.03%
Healthpeak Properties, Inc.	DOC	18.26	695	12,690	0.03%	6.68%	0.00%	6.00%	0.00%
Henry Schein, Inc.	HSIC	74.57	118	8,779	0.02%	0.00%	0.00%	10.50%	0.00%
Hewlett Packard Enterprise Company	HPE	21.87	1,319	28,856	0.06%	2.38%	0.00%	5.50%	0.00%
Hilton Worldwide Holdings Inc.	HLT	285.03	232	Excl.	Excl.	0.21%	n/a	NA	n/a
Hologic, Inc.	HOLX	74.97	223	16,711	0.04%	0.00%	0.00%	2.00%	0.00%
Honeywell International Inc.	HON	192.19	635	122,019	0.27%	2.48%	0.01%	9.50%	0.03%

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Hormel Foods Corporation	HRL	23.21	550	12,765	0.03%	5.04%	0.00%	5.00%	0.00%
Host Hotels & Resorts, Inc.	HST	17.63	688	12,124	0.03%	4.54%	0.00%	11.00%	0.00%
Howmet Aerospace Inc.	HWM	204.59	402	82,258	0.18%	0.23%	0.00%	12.00%	0.02%
HP Inc.	HPQ	24.42	935	22,825	0.05%	4.91%	0.00%	5.00%	0.00%
Hubbell Incorporated	HUBB	431.43	53	22,928	0.05%	1.32%	0.00%	6.00%	0.00%
Humana Inc.	HUM	245.77	120	29,560	0.06%	1.44%	0.00%	2.00%	0.00%
Huntington Bancshares Incorporated	HBAN	16.30	1,572	25,626	0.06%	3.80%	0.00%	7.50%	0.00%
Huntington Ingalls Industries, Inc.	HII	313.62	39	12,307	0.03%	1.76%	0.00%	11.50%	0.00%
IDEX Corporation	IEX	173.93	75	13,019	0.03%	1.63%	0.00%	5.00%	0.00%
IDEXX Laboratories, Inc.	IDXX	752.88	80	60,118	0.13%	0.00%	0.00%	12.50%	0.02%
Illinois Tool Works Inc.	ITW	249.28	290	72,316	0.16%	2.58%	0.00%	9.00%	0.01%
Incyte Corporation	INCY	104.46	196	Excl.	Excl.	0.00%	n/a	35.00%	n/a
Ingersoll Rand Inc.	IR	80.34	395	31,743	0.07%	0.10%	0.00%	8.50%	0.01%
Insulet Corporation	PODD	327.19	70	Excl.	Excl.	0.00%	n/a	33.50%	n/a
Intel Corporation	INTC	40.56	4,770	193,471	0.42%	0.00%	0.00%	18.00%	0.08%
Interactive Brokers Group, Inc.	IBKR	65.02	445	28,958	0.06%	0.49%	0.00%	14.00%	0.01%
Intercontinental Exchange, Inc.	ICE	157.30	570	89,689	0.20%	1.22%	0.00%	7.00%	0.01%
International Business Machines Corporation	IBM	308.58	935	288,441	0.63%	2.18%	0.01%	3.00%	0.02%
International Flavors & Fragrances Inc.	IFF	69.48	256	17,794	0.04%	2.30%	0.00%	2.00%	0.00%
International Paper Company	IP	39.48	528	20,847	0.05%	4.69%	0.00%	16.50%	0.01%
Intuit Inc.	INTU	634.08	278	176,448	0.39%	0.76%	0.00%	13.50%	0.05%
Intuitive Surgical, Inc.	ISRG	573.48	354	203,296	0.44%	0.00%	0.00%	16.00%	0.07%
Invesco Ltd.	IVZ	24.45	445	Excl.	Excl.	3.44%	n/a	23.00%	n/a
Invitation Homes Inc.	INVH	28.20	613	17,287	0.04%	4.11%	0.00%	10.00%	0.00%
IQVIA Holdings Inc.	IQV	230.01	170	39,171	0.09%	0.00%	0.00%	8.50%	0.01%
Iron Mountain Incorporated	IRM	86.35	296	25,524	0.06%	4.00%	0.00%	4.50%	0.00%
J.B. Hunt Transport Services, Inc.	JBHT	173.96	95	16,564	0.04%	1.01%	0.00%	7.00%	0.00%
Jabil Inc.	JBL	210.71	107	22,512	0.05%	0.15%	0.00%	12.00%	0.01%
Jack Henry & Associates, Inc.	JKHY	174.48	72	12,628	0.03%	1.33%	0.00%	9.00%	0.00%
Jacobs Solutions Inc.	J	134.81	119	16,009	0.03%	0.95%	0.00%	7.00%	0.00%
Johnson & Johnson	JNJ	206.92	2,409	498,531	1.09%	2.51%	0.03%	4.50%	0.05%
Johnson Controls International plc	JCI	116.31	611	71,081	0.16%	1.30%	0.00%	11.50%	0.02%
JPMorgan Chase & Co.	JPM	313.08	2,722	852,286	1.86%	1.92%	0.04%	10.00%	0.19%
Kellanova	K	83.64	348	29,101	0.06%	2.77%	0.00%	2.50%	0.00%
Kenvue Inc.	KVUE	17.35	1,916	Excl.	Excl.	4.78%	n/a	NA	n/a
Keurig Dr Pepper Inc.	KDP	27.90	1,359	37,904	0.08%	3.30%	0.00%	13.00%	0.01%
KeyCorp	KEY	18.38	1,093	20,088	0.04%	4.46%	0.00%	7.50%	0.00%
Keysight Technologies, Inc.	KEYS	197.95	171	33,889	0.07%	0.00%	0.00%	6.50%	0.00%
Kimberly-Clark Corporation	KMB	109.12	332	36,212	0.08%	4.62%	0.00%	7.00%	0.01%
Kimco Realty Corporation	KIM	20.66	677	Excl.	Excl.	5.03%	n/a	27.50%	n/a
Kinder Morgan, Inc.	KMI	27.32	2,225	60,780	0.13%	4.28%	0.01%	8.50%	0.01%
KKR & Co. Inc.	KKR	122.31	891	109,021	0.24%	0.61%	0.00%	7.00%	0.02%
KLA Corporation	KLAC	1,175.47	131	154,448	0.34%	0.65%	0.00%	12.50%	0.04%
L3Harris Technologies, Inc.	LHX	278.69	187	52,130	0.11%	1.72%	0.00%	16.00%	0.02%
Labcorp Holdings Inc.	LH	268.78	83	22,282	0.05%	1.07%	0.00%	6.50%	0.00%
Lam Research Corporation	LRCX	156.00	1,256	195,941	0.43%	0.67%	0.00%	12.50%	0.05%
Lamb Weston Holdings, Inc.	LW	59.06	139	8,230	0.02%	2.51%	0.00%	4.00%	0.00%
Las Vegas Sands Corp.	LVS	68.16	676	Excl.	Excl.	1.47%	n/a	NA	n/a
Leidos Holdings, Inc.	LDOS	191.10	128	24,433	0.05%	0.90%	0.00%	12.50%	0.01%
Lennar Corporation	LEN	131.30	247	32,433	0.07%	1.52%	0.00%	3.00%	0.00%
Lennox International Inc.	LII	498.87	35	17,497	0.04%	1.04%	0.00%	11.00%	0.00%
Linde plc	LIN	410.32	467	191,598	0.42%	1.46%	0.01%	7.50%	0.03%
Live Nation Entertainment, Inc.	LYV	131.45	232	Excl.	Excl.	0.00%	n/a	NA	n/a
LKQ Corporation	LKQ	29.69	256	7,600	0.02%	4.04%	0.00%	4.50%	0.00%
Lockheed Martin Corporation	LMT	457.86	231	105,948	0.23%	3.01%	0.01%	12.50%	0.03%
Loews Corporation	L	107.87	207	22,292	0.05%	0.23%	0.00%	14.00%	0.01%
Lowe's Companies, Inc.	LOW	242.48	561	136,020	0.30%	1.98%	0.01%	5.50%	0.02%
lululemon athletica inc.	LULU	184.18	119	21,841	0.05%	0.00%	0.00%	12.00%	0.01%
LyondellBasell Industries N.V.	LYB	48.99	322	Excl.	Excl.	11.19%	n/a	-6.00%	n/a
M&T Bank Corporation	MTB	190.22	154	29,235	0.06%	3.15%	0.00%	5.50%	0.00%
Marathon Petroleum Corporation	MPC	193.73	301	Excl.	Excl.	2.06%	n/a	-8.00%	n/a
Marriott International, Inc.	MAR	304.79	268	81,791	0.18%	0.88%	0.00%	9.00%	0.02%
Marsh & McLennan Companies, Inc.	MMC	183.45	490	89,874	0.20%	1.96%	0.00%	14.00%	0.03%
Martin Marietta Materials, Inc.	MLM	623.24	60	37,586	0.08%	0.53%	0.00%	9.50%	0.01%
Masco Corporation	MAS	64.87	208	13,473	0.03%	1.91%	0.00%	10.00%	0.00%
Mastercard Incorporated	MA	550.53	898	494,374	1.08%	0.55%	0.01%	11.00%	0.12%
Match Group, Inc.	MTCH	33.31	236	7,863	0.02%	2.28%	0.00%	6.50%	0.00%
McCormick & Company, Incorporated	MKC	67.48	268	18,110	0.04%	2.85%	0.00%	6.00%	0.00%
McDonald's Corporation	MCD	311.82	712	222,064	0.49%	2.39%	0.01%	8.50%	0.04%
McKesson Corporation	MCK	881.12	123	108,754	0.24%	0.37%	0.00%	12.00%	0.03%
Medtronic plc	MDT	105.33	1,282	135,035	0.30%	2.68%	0.01%	7.00%	0.02%
Merck & Co., Inc.	MRK	104.83	2,482	260,190	0.57%	3.24%	0.02%	13.00%	0.07%
Meta Platforms, Inc.	META	647.95	2,521	1,633,176	3.57%	0.32%	0.01%	18.00%	0.64%
MetLife, Inc.	MET	76.56	659	50,445	0.11%	2.96%	0.00%	7.50%	0.01%
Mettler-Toledo International Inc.	MTD	1,476.72	20	30,167	0.07%	0.00%	0.00%	9.50%	0.01%
MGM Resorts International	MGM	35.29	274	Excl.	Excl.	0.00%	n/a	25.00%	n/a
Microchip Technology Incorporated	MCHP	53.58	540	28,957	0.06%	3.40%	0.00%	3.00%	0.00%

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Micron Technology, Inc.	MU	236.48	1,122	Excl.	Excl.	0.19%	n/a	44.00%	n/a
Microsoft Corporation	MSFT	492.01	7,432	3,656,804	7.99%	0.74%	0.06%	12.50%	1.00%
Mid-America Apartment Communities, Inc.	MAA	135.89	117	15,910	0.03%	4.46%	0.00%	1.50%	0.00%
Moderna, Inc.	MRNA	25.98	391	Excl.	Excl.	0.00%	n/a	NA	n/a
Mohawk Industries, Inc.	MHK	115.90	62	7,165	0.02%	0.00%	0.00%	3.50%	0.00%
Molina Healthcare, Inc.	MOH	148.26	51	7,621	0.02%	0.00%	0.00%	10.50%	0.00%
Molson Coors Beverage Company	TAP	46.51	198	9,192	0.02%	4.04%	0.00%	10.00%	0.00%
Mondelez International, Inc.	MDLZ	57.57	1,290	74,286	0.16%	3.47%	0.01%	7.50%	0.01%
Monolithic Power Systems, Inc.	MPWR	928.17	48	44,466	0.10%	0.67%	0.00%	12.00%	0.01%
Monster Beverage Corporation	MNST	74.99	977	73,267	0.16%	0.00%	0.00%	12.00%	0.02%
Moody's Corporation	MCO	490.78	178	87,553	0.19%	0.77%	0.00%	10.50%	0.02%
Morgan Stanley	MS	169.66	1,589	269,642	0.59%	2.36%	0.01%	12.50%	0.07%
Motorola Solutions, Inc.	MSI	369.68	167	61,572	0.13%	1.31%	0.00%	9.50%	0.01%
MSCI Inc.	MSCI	563.72	75	42,358	0.09%	1.28%	0.00%	8.50%	0.01%
Nasdaq, Inc.	NDAQ	90.92	571	51,915	0.11%	1.19%	0.00%	9.00%	0.01%
NetApp, Inc.	NTAP	111.56	198	22,096	0.05%	1.86%	0.00%	9.50%	0.00%
Netflix, Inc.	NFLX	107.58	4,237	455,851	1.00%	0.00%	0.00%	20.00%	0.20%
Newmont Corporation	NEM	90.73	1,091	99,010	0.22%	1.10%	0.00%	12.50%	0.03%
News Corporation	NWSA	25.68	560	14,372	0.03%	0.78%	0.00%	17.00%	0.01%
NextEra Energy, Inc.	NEE	86.29	2,083	179,708	0.39%	2.63%	0.01%	8.50%	0.03%
NIKE, Inc.	NKE	64.63	1,478	95,536	0.21%	2.54%	0.01%	3.50%	0.01%
NiSource Inc.	NI	44.13	477	21,059	0.05%	2.54%	0.00%	8.00%	0.00%
Nordson Corporation	NDSN	237.66	56	13,353	0.03%	1.38%	0.00%	10.00%	0.00%
Norfolk Southern Corporation	NSC	292.09	224	65,541	0.14%	1.85%	0.00%	9.50%	0.01%
Northern Trust Corporation	NTRS	131.34	189	24,839	0.05%	2.44%	0.00%	6.50%	0.00%
Northrop Grumman Corporation	NOC	572.25	143	81,672	0.18%	1.61%	0.00%	7.50%	0.01%
Norwegian Cruise Line Holdings Ltd.	NCLH	18.46	455	Excl.	Excl.	0.00%	n/a	NA	n/a
NRG Energy, Inc.	NRG	169.49	192	32,481	0.07%	1.04%	0.00%	18.50%	0.01%
Nucor Corporation	NUE	159.49	229	36,501	0.08%	1.38%	0.00%	1.00%	0.00%
NVIDIA Corporation	NVDA	177.00	24,299	Excl.	Excl.	0.02%	n/a	31.50%	n/a
NVR, Inc.	NVR	7,507.29	3	21,316	0.05%	0.00%	0.00%	1.50%	0.00%
NXP Semiconductors N.V.	NXPI	194.94	252	49,061	0.11%	2.08%	0.00%	7.50%	0.01%
Occidental Petroleum Corporation	OXY	42.00	985	41,379	0.09%	2.29%	0.00%	2.50%	0.00%
Old Dominion Freight Line, Inc.	ODFL	135.29	209	28,289	0.06%	0.83%	0.00%	4.50%	0.00%
Omnicom Group Inc.	OMC	71.62	193	13,821	0.03%	4.47%	0.00%	7.00%	0.00%
ON Semiconductor Corporation	ON	50.24	402	20,215	0.04%	0.00%	0.00%	4.00%	0.00%
ONEOK, Inc.	OKE	72.82	629	45,821	0.10%	5.66%	0.01%	10.50%	0.01%
Oracle Corporation	ORCL	201.95	2,851	Excl.	Excl.	0.99%	n/a	21.00%	n/a
O'Reilly Automotive, Inc.	ORLY	101.70	844	85,845	0.19%	0.00%	0.00%	10.50%	0.02%
Otis Worldwide Corporation	OTIS	88.85	390	34,626	0.08%	1.89%	0.00%	9.50%	0.01%
PACCAR Inc	PCAR	105.42	525	Excl.	Excl.	1.25%	n/a	-1.00%	n/a
Packaging Corporation of America	PKG	204.07	89	18,238	0.04%	2.45%	0.00%	9.00%	0.00%
Palantir Technologies Inc.	PLTR	168.45	2,383	Excl.	Excl.	0.00%	n/a	NA	n/a
Palo Alto Networks, Inc.	PANW	190.13	697	Excl.	Excl.	0.00%	n/a	26.50%	n/a
Paramount Skydance Corporation	PSKY	16.02	1,098	Excl.	Excl.	1.25%	n/a	NA	n/a
Parker-Hannifin Corporation	PH	861.70	126	108,735	0.24%	0.84%	0.00%	10.50%	0.02%
Paychex, Inc.	PAYX	111.69	360	40,197	0.09%	3.87%	0.00%	8.00%	0.01%
Paycom Software, Inc.	PAYC	161.17	55	8,849	0.02%	0.93%	0.00%	11.00%	0.00%
PayPal Holdings, Inc.	PYPL	62.69	936	58,656	0.13%	0.89%	0.00%	13.50%	0.02%
Pentair plc	PNR	105.24	164	17,222	0.04%	0.95%	0.00%	12.00%	0.00%
PepsiCo, Inc.	PEP	148.74	1,383	205,733	0.45%	3.83%	0.02%	5.50%	0.02%
Pfizer Inc.	PFE	25.74	5,686	146,350	0.32%	6.68%	0.02%	6.00%	0.02%
PG&E Corporation	PCG	16.12	2,198	35,430	0.08%	0.62%	0.00%	9.00%	0.01%
Philip Morris International Inc.	PM	157.48	1,557	245,139	0.54%	3.73%	0.02%	5.00%	0.03%
Phillips 66	PSX	136.96	403	55,184	0.12%	3.50%	0.00%	0.00%	0.00%
Pinnacle West Capital Corporation	PNW	90.86	120	10,875	0.02%	4.01%	0.00%	5.00%	0.00%
Pool Corporation	POOL	243.60	37	9,074	0.02%	2.05%	0.00%	3.50%	0.00%
PPG Industries, Inc.	PPG	100.04	224	22,449	0.05%	2.84%	0.00%	6.00%	0.00%
PPL Corporation	PPL	36.90	740	27,296	0.06%	2.95%	0.00%	7.50%	0.00%
Principal Financial Group, Inc.	PFG	84.82	220	18,634	0.04%	3.73%	0.00%	4.00%	0.00%
Prologis, Inc.	PLD	128.53	929	119,387	0.26%	3.14%	0.01%	2.50%	0.01%
Prudential Financial, Inc.	PRU	108.25	350	37,877	0.08%	4.99%	0.00%	4.00%	0.00%
PTC Inc.	PTC	175.43	119	Excl.	Excl.	0.00%	n/a	29.00%	n/a
Public Service Enterprise Group Incorporated	PEG	83.52	499	41,689	0.09%	3.02%	0.00%	7.00%	0.01%
Public Storage	PSA	274.54	175	48,172	0.11%	4.37%	0.00%	7.00%	0.01%
PulteGroup, Inc.	PHM	127.19	195	24,791	0.05%	0.82%	0.00%	5.00%	0.00%
Qnity Electronics, Inc.	Q	81.09	209	Excl.	Excl.	0.30%	n/a	NA	n/a
QUALCOMM Incorporated	QCOM	168.09	1,070	179,804	0.39%	2.12%	0.01%	6.50%	0.03%
Quanta Services, Inc.	PWR	464.88	149	69,321	0.15%	0.09%	0.00%	18.00%	0.03%
Quest Diagnostics Incorporated	DGX	189.18	111	21,045	0.05%	1.69%	0.00%	8.00%	0.00%
Ralph Lauren Corporation	RL	367.33	61	22,275	0.05%	0.99%	0.00%	14.00%	0.01%
Raymond James Financial, Inc.	RJF	156.54	197	30,787	0.07%	1.28%	0.00%	11.00%	0.01%
Realty Income Corporation	O	57.61	920	52,996	0.12%	5.61%	0.01%	5.00%	0.01%
Regency Centers Corporation	REG	71.16	182	12,980	0.03%	4.24%	0.00%	6.50%	0.00%
Regeneron Pharmaceuticals, Inc.	REGN	780.19	103	80,047	0.17%	0.45%	0.00%	2.50%	0.00%
Regions Financial Corporation	RF	25.45	877	22,317	0.05%	4.17%	0.00%	7.00%	0.00%
Republic Services, Inc.	RSG	217.06	310	67,194	0.15%	1.15%	0.00%	10.00%	0.01%

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ResMed Inc.	RMD	255.83	146	37,343	0.08%	0.94%	0.00%	11.00%	0.01%
Revvity, Inc.	RVTY	104.41	113	11,838	0.03%	0.27%	0.00%	6.00%	0.00%
Robinhood Markets, Inc.	HOOD	128.49	899	Excl.	Excl.	0.00%	n/a	NA	n/a
Rockwell Automation, Inc.	ROK	395.86	112	44,445	0.10%	1.39%	0.00%	8.00%	0.01%
Rollins, Inc.	ROL	61.48	481	29,581	0.06%	1.19%	0.00%	10.00%	0.01%
Roper Technologies, Inc.	ROP	446.22	108	48,030	0.10%	0.82%	0.00%	8.00%	0.01%
Ross Stores, Inc.	ROST	176.36	325	57,357	0.13%	0.92%	0.00%	8.00%	0.01%
Royal Caribbean Cruises Ltd.	RCL	266.25	273	Excl.	Excl.	1.50%	n/a	NA	n/a
RTX Corporation	RTX	174.91	1,341	234,514	0.51%	1.56%	0.01%	14.00%	0.07%
S&P Global Inc.	SPGI	498.83	303	151,046	0.33%	0.77%	0.00%	9.00%	0.03%
Salesforce, Inc.	CRM	230.54	952	Excl.	Excl.	0.72%	n/a	21.00%	n/a
Sandisk Corporation	SNDK	223.28	147	Excl.	Excl.	0.00%	n/a	NA	n/a
SBA Communications Corporation	SBAC	194.27	107	20,699	0.05%	2.29%	0.00%	14.00%	0.01%
Seagate Technology Holdings plc	STX	276.69	218	Excl.	Excl.	1.05%	n/a	28.00%	n/a
Sempra	SRE	94.72	653	61,822	0.14%	2.72%	0.00%	5.00%	0.01%
ServiceNow, Inc.	NOW	812.41	207	Excl.	Excl.	0.00%	n/a	25.50%	n/a
Simon Property Group, Inc.	SPG	186.32	326	60,828	0.13%	4.72%	0.01%	3.50%	0.00%
Skyworks Solutions, Inc.	SWKS	65.95	149	Excl.	Excl.	4.31%	n/a	NA	n/a
SLB N.V.	SLB	36.24	1,494	54,140	0.12%	3.15%	0.00%	11.00%	0.01%
Smurfit Westrock Plc	SW	35.69	521	Excl.	Excl.	4.83%	n/a	NA	n/a
Snap-on Incorporated	SNA	340.05	52	17,685	0.04%	2.87%	0.00%	4.50%	0.00%
Solstice Advanced Materials, Inc.	SOLS	47.68	159	Excl.	Excl.	0.00%	n/a	NA	n/a
Solventum Corporation	SOLV	85.26	173	Excl.	Excl.	0.00%	n/a	NA	n/a
Southwest Airlines Co.	LUV	34.81	517	Excl.	Excl.	2.07%	n/a	20.50%	n/a
Stanley Black & Decker, Inc.	SWK	71.52	155	11,077	0.02%	4.64%	0.00%	20.00%	0.00%
Starbucks Corporation	SBUX	87.11	1,137	99,053	0.22%	2.85%	0.01%	0.50%	0.00%
State Street Corporation	STT	119.02	279	33,244	0.07%	2.82%	0.00%	9.50%	0.01%
Steel Dynamics, Inc.	STLD	167.83	146	24,509	0.05%	1.19%	0.00%	0.50%	0.00%
STERIS plc	STE	266.28	98	26,135	0.06%	0.95%	0.00%	6.50%	0.00%
Stryker Corporation	SYK	371.18	382	141,948	0.31%	0.91%	0.00%	10.50%	0.03%
Super Micro Computer, Inc.	SMCI	33.85	597	Excl.	Excl.	0.00%	n/a	29.00%	n/a
Synchrony Financial	SYF	77.36	360	27,863	0.06%	1.55%	0.00%	8.50%	0.01%
Synopsys, Inc.	SNPS	418.01	186	77,645	0.17%	0.00%	0.00%	12.00%	0.02%
Sysco Corporation	SYY	76.20	479	36,489	0.08%	2.83%	0.00%	8.00%	0.01%
T. Rowe Price Group, Inc.	TROW	102.38	218	22,343	0.05%	4.96%	0.00%	8.50%	0.00%
Take-Two Interactive Software, Inc.	TTWO	246.07	185	Excl.	Excl.	0.00%	n/a	NA	n/a
Tapestry, Inc.	TPR	109.28	205	22,364	0.05%	1.46%	0.00%	9.50%	0.00%
Targa Resources Corp.	TRGP	175.31	215	37,632	0.08%	2.28%	0.00%	20.00%	0.02%
Target Corporation	TGT	90.62	453	41,033	0.09%	5.03%	0.00%	7.00%	0.01%
TE Connectivity plc	TEL	226.15	294	66,531	0.15%	1.23%	0.00%	8.50%	0.01%
Teledyne Technologies Incorporated	TDY	499.52	47	23,453	0.05%	0.00%	0.00%	9.50%	0.00%
Teradyne, Inc.	TER	181.89	157	28,485	0.06%	0.26%	0.00%	8.00%	0.00%
Tesla, Inc.	TSLA	430.17	3,326	1,430,668	3.13%	0.00%	0.00%	14.00%	0.44%
Texas Instruments Incorporated	TXN	168.27	909	152,894	0.33%	3.38%	0.01%	6.50%	0.02%
Texas Pacific Land Corporation	TPL	864.29	23	19,861	0.04%	0.74%	0.00%	10.00%	0.00%
Textron Inc.	TXT	83.16	176	14,655	0.03%	0.10%	0.00%	12.00%	0.00%
The AES Corporation	AES	14.06	712	Excl.	Excl.	5.01%	n/a	30.00%	n/a
The Allstate Corporation	ALL	212.98	262	Excl.	Excl.	1.88%	n/a	27.50%	n/a
The Bank of New York Mellon Corporation	BK	112.10	697	78,173	0.17%	1.89%	0.00%	11.50%	0.02%
The Boeing Company	BA	189.00	760	Excl.	Excl.	0.00%	n/a	NA	n/a
The Campbell's Company	CPB	30.48	298	9,074	0.02%	5.12%	0.00%	6.00%	0.00%
The Charles Schwab Corporation	SCHW	92.73	1,777	164,775	0.36%	1.16%	0.00%	12.00%	0.04%
The Cigna Group	CI	277.28	267	74,069	0.16%	2.18%	0.00%	11.00%	0.02%
The Clorox Company	CLX	107.94	122	13,167	0.03%	4.60%	0.00%	9.00%	0.00%
The Coca-Cola Company	KO	73.12	4,302	314,534	0.69%	2.79%	0.02%	7.00%	0.05%
The Cooper Companies, Inc.	COO	77.93	199	15,493	0.03%	0.00%	0.00%	8.50%	0.00%
The Estée Lauder Companies Inc.	EL	94.07	360	33,899	0.07%	1.49%	0.00%	3.50%	0.00%
The Goldman Sachs Group, Inc.	GS	826.04	314	259,145	0.57%	1.94%	0.01%	12.00%	0.07%
The Hartford Insurance Group, Inc.	HIG	137.03	279	38,183	0.08%	1.75%	0.00%	7.00%	0.01%
The Hershey Company	HSY	188.08	203	38,140	0.08%	2.91%	0.00%	5.00%	0.00%
The Home Depot, Inc.	HD	356.92	996	355,318	0.78%	2.58%	0.02%	7.00%	0.05%
The J. M. Smucker Company	SJM	104.18	107	11,115	0.02%	4.22%	0.00%	4.50%	0.00%
The Kraft Heinz Company	KHC	25.51	1,184	30,195	0.07%	6.27%	0.00%	4.50%	0.00%
The Kroger Co.	KR	67.28	663	44,585	0.10%	2.08%	0.00%	6.00%	0.01%
The Mosaic Company	MOS	24.49	317	Excl.	Excl.	3.59%	n/a	-8.00%	n/a
The PNC Financial Services Group, Inc.	PNC	190.72	392	74,792	0.16%	3.57%	0.01%	8.50%	0.01%
The Procter & Gamble Company	PG	148.16	2,337	346,210	0.76%	2.85%	0.02%	4.50%	0.03%
The Progressive Corporation	PGR	228.79	586	134,162	0.29%	0.17%	0.00%	16.50%	0.05%
The Sherwin-Williams Company	SHW	343.69	246	84,708	0.19%	0.92%	0.00%	10.50%	0.02%
The Southern Company	SO	91.12	1,101	100,333	0.22%	3.25%	0.01%	6.50%	0.01%
The TJX Companies, Inc.	TJX	151.92	1,113	169,078	0.37%	1.12%	0.00%	12.50%	0.05%
The Trade Desk, Inc.	TTD	39.56	484	Excl.	Excl.	0.00%	n/a	26.00%	n/a
The Travelers Companies, Inc.	TRV	292.86	223	65,326	0.14%	1.50%	0.00%	12.00%	0.02%
The Walt Disney Company	DIS	104.47	1,785	Excl.	Excl.	1.44%	n/a	25.00%	n/a
The Williams Companies, Inc.	WMB	60.93	1,221	74,409	0.16%	3.28%	0.01%	9.50%	0.02%
Thermo Fisher Scientific Inc.	TMO	590.83	376	221,980	0.49%	0.29%	0.00%	8.00%	0.04%
TKO Group Holdings, Inc.	TKO	193.89	79	Excl.	Excl.	1.57%	n/a	NA	n/a

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T-Mobile US, Inc.	TMUS	209.01	1,119	233,779	0.51%	1.95%	0.01%	17.50%	0.09%
Tractor Supply Company	TSCO	54.78	528	28,946	0.06%	1.68%	0.00%	8.50%	0.01%
Trane Technologies plc	TT	421.48	222	93,459	0.20%	0.89%	0.00%	12.50%	0.03%
TransDigm Group Incorporated	TDG	1,360.17	56	76,603	0.17%	0.00%	0.00%	13.00%	0.02%
Trimble Inc.	TRMB	81.42	238	19,372	0.04%	0.00%	0.00%	6.50%	0.00%
Truist Financial Corporation	TFC	46.50	1,279	59,485	0.13%	4.47%	0.01%	5.00%	0.01%
Tyler Technologies, Inc.	TYL	469.62	43	20,207	0.04%	0.00%	0.00%	10.50%	0.00%
Tyson Foods, Inc.	TSN	58.05	353	20,495	0.04%	3.51%	0.00%	4.00%	0.00%
U.S. Bancorp	USB	49.05	1,554	76,245	0.17%	4.24%	0.01%	7.00%	0.01%
Uber Technologies, Inc.	UBER	87.54	2,078	Excl.	Excl.	0.00%	n/a	NA	n/a
UDR, Inc.	UDR	36.42	330	12,036	0.03%	4.72%	0.00%	7.50%	0.00%
Ulta Beauty, Inc.	ULTA	538.83	45	24,160	0.05%	0.00%	0.00%	5.50%	0.00%
Union Pacific Corporation	UNP	231.83	593	137,512	0.30%	2.38%	0.01%	6.50%	0.02%
United Airlines Holdings, Inc.	UAL	101.96	324	33,008	0.07%	0.00%	0.00%	13.00%	0.01%
United Parcel Service, Inc.	UPS	95.79	848	81,267	0.18%	6.85%	0.01%	0.50%	0.00%
United Rentals, Inc.	URI	815.18	64	51,870	0.11%	0.88%	0.00%	9.50%	0.01%
UnitedHealth Group Incorporated	UNH	329.77	906	298,718	0.65%	2.68%	0.02%	3.00%	0.02%
Universal Health Services, Inc.	UHS	243.63	62	15,223	0.03%	0.33%	0.00%	13.50%	0.00%
Valero Energy Corporation	VLO	176.76	305	Excl.	Excl.	2.56%	n/a	-8.00%	n/a
Ventas, Inc.	VTR	80.63	470	Excl.	Excl.	2.38%	n/a	23.00%	n/a
Veralto Corporation	VLTO	101.22	248	25,133	0.05%	0.43%	0.00%	6.00%	0.00%
VeriSign, Inc.	VRSN	251.99	93	23,359	0.05%	1.22%	0.00%	10.00%	0.01%
Verisk Analytics, Inc.	VRSK	225.07	139	31,369	0.07%	0.80%	0.00%	8.00%	0.01%
Verizon Communications Inc.	VZ	41.11	4,216	173,337	0.38%	6.71%	0.03%	0.50%	0.00%
Vertex Pharmaceuticals Incorporated	VRTX	433.61	254	110,015	0.24%	0.00%	0.00%	9.00%	0.02%
Viatris Inc.	VTRS	10.69	1,152	12,312	0.03%	4.49%	0.00%	0.00%	0.00%
VICI Properties Inc.	VICI	28.82	1,069	30,803	0.07%	6.25%	0.00%	8.00%	0.01%
Visa Inc.	V	334.44	1,914	640,150	1.40%	0.80%	0.01%	10.50%	0.15%
Vistra Corp.	VST	178.86	339	Excl.	Excl.	0.51%	n/a	30.50%	n/a
Vulcan Materials Company	VMC	297.24	132	39,275	0.09%	0.66%	0.00%	7.00%	0.01%
W. R. Berkley Corporation	WRB	77.69	380	29,524	0.06%	0.46%	0.00%	13.50%	0.01%
W.W. Grainger, Inc.	GWW	948.63	48	45,107	0.10%	0.95%	0.00%	5.00%	0.00%
Walmart Inc.	WMT	110.51	7,973	881,080	1.93%	0.85%	0.02%	10.00%	0.19%
Warner Bros. Discovery, Inc.	WBD	24.00	2,478	Excl.	Excl.	0.00%	n/a	NA	n/a
Waste Management, Inc.	WM	217.87	403	87,773	0.19%	1.51%	0.00%	7.50%	0.01%
Waters Corporation	WAT	403.42	60	24,018	0.05%	0.00%	0.00%	7.50%	0.00%
WEC Energy Group, Inc.	WEC	112.07	325	36,456	0.08%	3.19%	0.00%	6.00%	0.00%
Wells Fargo & Company	WFC	85.85	3,139	269,490	0.59%	2.10%	0.01%	8.00%	0.05%
Welltower Inc.	WELL	208.22	686	Excl.	Excl.	1.42%	n/a	23.50%	n/a
West Pharmaceutical Services, Inc.	WST	277.25	72	19,946	0.04%	0.32%	0.00%	5.00%	0.00%
Western Digital Corporation	WDC	163.33	342	Excl.	Excl.	0.31%	n/a	NA	n/a
Westinghouse Air Brake Technologies Corporati	WAB	208.55	171	35,653	0.08%	0.48%	0.00%	15.00%	0.01%
Weyerhaeuser Company	WY	22.21	721	16,010	0.03%	3.78%	0.00%	6.50%	0.00%
Williams-Sonoma, Inc.	WSM	180.01	119	21,490	0.05%	1.47%	0.00%	5.00%	0.00%
Willis Towers Watson Public Limited Company	WTW	321.00	96	30,735	0.07%	1.13%	0.00%	9.00%	0.01%
Workday, Inc.	WDAY	215.62	263	56,708	0.12%	0.00%	0.00%	12.00%	0.01%
Wynn Resorts, Limited	WYNN	128.68	103	Excl.	Excl.	0.78%	n/a	27.00%	n/a
Xcel Energy Inc.	XEL	82.11	592	48,571	0.11%	2.78%	0.00%	7.00%	0.01%
Xylem Inc.	XYL	140.67	243	34,249	0.07%	1.14%	0.00%	10.00%	0.01%
Yum! Brands, Inc.	YUM	153.21	278	42,539	0.09%	1.85%	0.00%	10.00%	0.01%
Zebra Technologies Corporation	ZBRA	252.75	51	12,804	0.03%	0.00%	0.00%	6.50%	0.00%
Zimmer Biomet Holdings, Inc.	ZBH	97.52	198	19,329	0.04%	0.98%	0.00%	5.00%	0.00%
Zoetis Inc.	ZTS	128.18	441	56,488	0.12%	1.56%	0.00%	7.50%	0.01%

Notes:
[4] Source: S&P Capital IQ
[5] Source: S&P Capital IQ
[6] Equals [4] x [5], excluding growth rates less than 0% or greater than 20%
[7] Equals [6] / Sum of Column [6]
[8] Source: S&P Capital IQ
[9] Equals [7] x [8]
[10] Source: Value Line
[11] Equals [7] x [10], excluding growth rates less than 0% or greater than 20%

NATIONAL FUEL EXHIBIT JCN-6

CAPITAL ASSET PRICING MODEL - CURRENT RISK-FREE RATE, VALUE LINE BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - ALL COMPANIES
K = Rf + β (Rm − Rf)

Company	Ticker	[1] Current 30-day average of 30-year U.S. Treasury bond yield	[2] Beta (β)	[3] Market Return (Rm)	[4] Market Risk Premium (Rm − Rf)	[5] ROE (K)
Atmos Energy Corporation	ATO	4.66%	0.75	15.09%	10.43%	12.48%
New Jersey Resources Corporation	NJR	4.66%	0.75	15.09%	10.43%	12.48%
NiSource Inc.	NI	4.66%	0.85	15.09%	10.43%	13.53%
Northwest Natural Holding Co.	NWN	4.66%	0.75	15.09%	10.43%	12.48%
ONE Gas Inc.	OGS	4.66%	0.75	15.09%	10.43%	12.48%
Southwest Gas Holdings, Inc.	SWX	4.66%	0.75	15.09%	10.43%	12.48%
Spire, Inc.	SR	4.66%	0.75	15.09%	10.43%	12.48%
Median			0.75			12.48%
Mean			0.76			12.63%

Notes:
[1] Source: FRED, Federal Reserve Bank of St. Louis, 30-day average as of November 28, 2025
[2] Source: Value Line Reports
[3] Source: Exhibit JCN-5, page 1
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- NEAR-TERM PROJECTED RISK-FREE RATE, VALUE LINE BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - ALL COMPANIES
K = Rf + β (Rm − Rf)

Company	Ticker	[1] Near-term projected 30-year U.S. Treasury bond yield (Q1 2026 - Q1 2027)	[2] Beta (β)	[3] Market Return (Rm)	[4] Market Risk Premium (Rm − Rf)	[5] ROE (K)
Atmos Energy Corporation	ATO	4.60%	0.75	15.09%	10.49%	12.47%
New Jersey Resources Corporation	NJR	4.60%	0.75	15.09%	10.49%	12.47%
NiSource Inc.	NI	4.60%	0.85	15.09%	10.49%	13.52%
Northwest Natural Holding Co.	NWN	4.60%	0.75	15.09%	10.49%	12.47%
ONE Gas Inc.	OGS	4.60%	0.75	15.09%	10.49%	12.47%
Southwest Gas Holdings, Inc.	SWX	4.60%	0.75	15.09%	10.49%	12.47%
Spire, Inc.	SR	4.60%	0.75	15.09%	10.49%	12.47%
Median			0.75			12.47%
Mean			0.76			12.62%

Notes:
[1] Source: Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025 at 2
[2] Source: Value Line Reports
[3] Source: Exhibit JCN-5, page 1
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- LONG-TERM PROJECTED RISK-FREE RATE, VALUE LINE BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - ALL COMPANIES
K = Rf + β (Rm − Rf)

Company	Ticker	[1] Projected 30-year U.S. Treasury bond yield (2027 - 2031)	[2] Beta (β)	[3] Market Return (Rm)	[4] Market Risk Premium (Rm − Rf)	[5] ROE (K)
Atmos Energy Corporation	ATO	4.60%	0.75	15.09%	10.49%	12.47%
New Jersey Resources Corporation	NJR	4.60%	0.75	15.09%	10.49%	12.47%
NiSource Inc.	NI	4.60%	0.85	15.09%	10.49%	13.52%
Northwest Natural Holding Co.	NWN	4.60%	0.75	15.09%	10.49%	12.47%
ONE Gas Inc.	OGS	4.60%	0.75	15.09%	10.49%	12.47%
Southwest Gas Holdings, Inc.	SWX	4.60%	0.75	15.09%	10.49%	12.47%
Spire, Inc.	SR	4.60%	0.75	15.09%	10.49%	12.47%
Median			0.75			12.47%
Mean			0.76			12.62%

Notes:
[1] Source: Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025 at 14
[2] Source: Value Line Reports
[3] Source: Exhibit JCN-5, page 1
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- CURRENT RISK-FREE RATE, BLOOMBERG BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - ALL COMPANIES
K = Rf + β (Rm − Rf)

		[1]	[2]	[3]	[4]	[5]
Company	Ticker	Current 30-day average of 30-year U.S. Treasury bond yield	Beta (β)	Market Return (Rm)	Market Risk Premium (Rm − Rf)	ROE (K)
Atmos Energy Corporation	ATO	4.66%	0.72	15.09%	10.43%	12.13%
New Jersey Resources Corporation	NJR	4.66%	0.75	15.09%	10.43%	12.50%
NiSource Inc.	NI	4.66%	0.76	15.09%	10.43%	12.64%
Northwest Natural Holding Co.	NWN	4.66%	0.67	15.09%	10.43%	11.68%
ONE Gas Inc.	OGS	4.66%	0.73	15.09%	10.43%	12.27%
Southwest Gas Holdings, Inc.	SWX	4.66%	0.80	15.09%	10.43%	13.01%
Spire, Inc.	SR	4.66%	0.74	15.09%	10.43%	12.38%
Median			0.74			12.38%
Mean			0.74			12.37%

Notes:
[1] Source: FRED, Federal Reserve Bank of St. Louis, 30-day average as of November 28, 2025
[2] Source: Bloomberg Professional, as of November 30, 2025
[3] Source: Exhibit JCN-5, page 1
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- NEAR-TERM PROJECTED RISK-FREE RATE, BLOOMBERG BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - ALL COMPANIES
K = Rf + β (Rm − Rf)

		[1]	[2]	[3]	[4]	[5]
Company	Ticker	Near-term projected 30-year U.S. Treasury bond yield (Q1 2026 - Q1 2027)	Beta (β)	Market Return (Rm)	Market Risk Premium (Rm − Rf)	ROE (K)
Atmos Energy Corporation	ATO	4.60%	0.72	15.09%	10.49%	12.12%
New Jersey Resources Corporation	NJR	4.60%	0.75	15.09%	10.49%	12.48%
NiSource Inc.	NI	4.60%	0.76	15.09%	10.49%	12.62%
Northwest Natural Holding Co.	NWN	4.60%	0.67	15.09%	10.49%	11.66%
ONE Gas Inc.	OGS	4.60%	0.73	15.09%	10.49%	12.25%
Southwest Gas Holdings, Inc.	SWX	4.60%	0.80	15.09%	10.49%	13.00%
Spire, Inc.	SR	4.60%	0.74	15.09%	10.49%	12.37%
Median			0.74			12.37%
Mean			0.74			12.36%

Notes:
[1] Source: Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025 at 2
[2] Source: Bloomberg Professional, as of November 30, 2025
[3] Source: Exhibit JCN-5, page 1
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- LONG-TERM PROJECTED RISK-FREE RATE, BLOOMBERG BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - ALL COMPANIES
K = Rf + β (Rm − Rf)

		[1]	[2]	[3]	[4]	[5]
Company	Ticker	Projected 30-year U.S. Treasury bond yield (2027 - 2031)	Beta (β)	Market Return (Rm)	Market Risk Premium (Rm − Rf)	ROE (K)
Atmos Energy Corporation	ATO	4.60%	0.72	15.09%	10.49%	12.12%
New Jersey Resources Corporation	NJR	4.60%	0.75	15.09%	10.49%	12.48%
NiSource Inc.	NI	4.60%	0.76	15.09%	10.49%	12.62%
Northwest Natural Holding Co.	NWN	4.60%	0.67	15.09%	10.49%	11.66%
ONE Gas Inc.	OGS	4.60%	0.73	15.09%	10.49%	12.25%
Southwest Gas Holdings, Inc.	SWX	4.60%	0.80	15.09%	10.49%	13.00%
Spire, Inc.	SR	4.60%	0.74	15.09%	10.49%	12.37%
Median			0.74			12.37%
Mean			0.74			12.36%

Notes:
[1] Source: Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025 at 14
[2] Source: Bloomberg Professional, as of November 30, 2025
[3] Source: Exhibit JCN-5, page 1
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- CURRENT RISK-FREE RATE, VALUE LINE BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - FERC METHODOLOGY
K = Rf + β (Rm − Rf)

		[1]	[2]	[3]	[4]	[5]
Company	Ticker	Current 30-day average of 30-year U.S. Treasury bond yield	Beta (β)	Market Return (Rm)	Market Risk Premium (Rm − Rf)	ROE (K)
Atmos Energy Corporation	ATO	4.66%	0.75	11.62%	6.96%	9.88%
New Jersey Resources Corporation	NJR	4.66%	0.75	11.62%	6.96%	9.88%
NiSource Inc.	NI	4.66%	0.85	11.62%	6.96%	10.57%
Northwest Natural Holding Co.	NWN	4.66%	0.75	11.62%	6.96%	9.88%
ONE Gas Inc.	OGS	4.66%	0.75	11.62%	6.96%	9.88%
Southwest Gas Holdings, Inc.	SWX	4.66%	0.75	11.62%	6.96%	9.88%
Spire, Inc.	SR	4.66%	0.75	11.62%	6.96%	9.88%
Median			0.75			9.88%
Mean			0.76			9.98%

Notes:
[1] Source: FRED, Federal Reserve Bank of St. Louis, 30-day average as of November 28, 2025
[2] Source: Value Line Reports
[3] Source: Exhibit JCN-5, page 8
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- NEAR-TERM PROJECTED RISK-FREE RATE, VALUE LINE BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - FERC METHODOLOGY
K = Rf + β (Rm − Rf)

		[1]	[2]	[3]	[4]	[5]
Company	Ticker	Near-term projected 30-year U.S. Treasury bond yield (Q1 2026 - Q1 2027)	Beta (β)	Market Return (Rm)	Market Risk Premium (Rm − Rf)	ROE (K)
Atmos Energy Corporation	ATO	4.60%	0.75	11.62%	7.02%	9.86%
New Jersey Resources Corporation	NJR	4.60%	0.75	11.62%	7.02%	9.86%
NiSource Inc.	NI	4.60%	0.85	11.62%	7.02%	10.56%
Northwest Natural Holding Co.	NWN	4.60%	0.75	11.62%	7.02%	9.86%
ONE Gas Inc.	OGS	4.60%	0.75	11.62%	7.02%	9.86%
Southwest Gas Holdings, Inc.	SWX	4.60%	0.75	11.62%	7.02%	9.86%
Spire, Inc.	SR	4.60%	0.75	11.62%	7.02%	9.86%
Median			0.75			9.86%
Mean			0.76			9.96%

Notes:
[1] Source: Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025 at 2
[2] Source: Value Line Reports
[3] Source: Exhibit JCN-5, page 8
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- LONG-TERM PROJECTED RISK-FREE RATE, VALUE LINE BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - FERC METHODOLOGY
K = Rf + β (Rm − Rf)

		[1]	[2]	[3]	[4]	[5]
Company	Ticker	Projected 30-year U.S. Treasury bond yield (2027 - 2031)	Beta (β)	Market Return (Rm)	Market Risk Premium (Rm − Rf)	ROE (K)
Atmos Energy Corporation	ATO	4.60%	0.75	11.62%	7.02%	9.86%
New Jersey Resources Corporation	NJR	4.60%	0.75	11.62%	7.02%	9.86%
NiSource Inc.	NI	4.60%	0.85	11.62%	7.02%	10.56%
Northwest Natural Holding Co.	NWN	4.60%	0.75	11.62%	7.02%	9.86%
ONE Gas Inc.	OGS	4.60%	0.75	11.62%	7.02%	9.86%
Southwest Gas Holdings, Inc.	SWX	4.60%	0.75	11.62%	7.02%	9.86%
Spire, Inc.	SR	4.60%	0.75	11.62%	7.02%	9.86%
Median			0.75			9.86%
Mean			0.76			9.96%

Notes:
[1] Source: Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025 at 14
[2] Source: Value Line Reports
[3] Source: Exhibit JCN-5, page 8
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- CURRENT RISK-FREE RATE, BLOOMBERG BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - FERC METHODOLOGY
K = Rf + β (Rm − Rf)

Company	Ticker	[1] Current 30-day average of 30-year U.S. Treasury bond yield	[2] Beta (β)	[3] Market Return (Rm)	[4] Market Risk Premium (Rm − Rf)	[5] ROE (K)
Atmos Energy Corporation	ATO	4.66%	0.72	11.62%	6.96%	9.64%
New Jersey Resources Corporation	NJR	4.66%	0.75	11.62%	6.96%	9.89%
NiSource Inc.	NI	4.66%	0.76	11.62%	6.96%	9.98%
Northwest Natural Holding Co.	NWN	4.66%	0.67	11.62%	6.96%	9.34%
ONE Gas Inc.	OGS	4.66%	0.73	11.62%	6.96%	9.73%
Southwest Gas Holdings, Inc.	SWX	4.66%	0.80	11.62%	6.96%	10.23%
Spire, Inc.	SR	4.66%	0.74	11.62%	6.96%	9.81%
Median			0.74			9.81%
Mean			0.74			9.80%

Notes:
[1] Source: FRED, Federal Reserve Bank of St. Louis, 30-day average as of November 28, 2025
[2] Source: Bloomberg Professional, as of November 30, 2025
[3] Source: Exhibit JCN-5, page 8
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- NEAR-TERM PROJECTED RISK-FREE RATE, BLOOMBERG BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - FERC METHODOLOGY
K = Rf + β (Rm − Rf)

Company	Ticker	[1] Near-term projected 30-year U.S. Treasury bond yield (Q1 2026 - Q1 2027)	[2] Beta (β)	[3] Market Return (Rm)	[4] Market Risk Premium (Rm − Rf)	[5] ROE (K)
Atmos Energy Corporation	ATO	4.60%	0.72	11.62%	7.02%	9.63%
New Jersey Resources Corporation	NJR	4.60%	0.75	11.62%	7.02%	9.87%
NiSource Inc.	NI	4.60%	0.76	11.62%	7.02%	9.97%
Northwest Natural Holding Co.	NWN	4.60%	0.67	11.62%	7.02%	9.32%
ONE Gas Inc.	OGS	4.60%	0.73	11.62%	7.02%	9.72%
Southwest Gas Holdings, Inc.	SWX	4.60%	0.80	11.62%	7.02%	10.22%
Spire, Inc.	SR	4.60%	0.74	11.62%	7.02%	9.79%
Median			0.74			9.79%
Mean			0.74			9.79%

Notes:
[1] Source: Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025 at 2
[2] Source: Bloomberg Professional, as of November 30, 2025
[3] Source: Exhibit JCN-5, page 8
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- LONG-TERM PROJECTED RISK-FREE RATE, BLOOMBERG BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - FERC METHODOLOGY
K = Rf + β (Rm − Rf)

Company	Ticker	[1] Projected 30-year U.S. Treasury bond yield (2027 - 2031)	[2] Beta (β)	[3] Market Return (Rm)	[4] Market Risk Premium (Rm − Rf)	[5] ROE (K)
Atmos Energy Corporation	ATO	4.60%	0.72	11.62%	7.02%	9.63%
New Jersey Resources Corporation	NJR	4.60%	0.75	11.62%	7.02%	9.87%
NiSource Inc.	NI	4.60%	0.76	11.62%	7.02%	9.97%
Northwest Natural Holding Co.	NWN	4.60%	0.67	11.62%	7.02%	9.32%
ONE Gas Inc.	OGS	4.60%	0.73	11.62%	7.02%	9.72%
Southwest Gas Holdings, Inc.	SWX	4.60%	0.80	11.62%	7.02%	10.22%
Spire, Inc.	SR	4.60%	0.74	11.62%	7.02%	9.79%
Median			0.74			9.79%
Mean			0.74			9.79%

Notes:
[1] Source: Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025 at 14
[2] Source: Bloomberg Professional, as of November 30, 2025
[3] Source: Exhibit JCN-5, page 8
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

NATIONAL FUEL EXHIBIT JCN-7

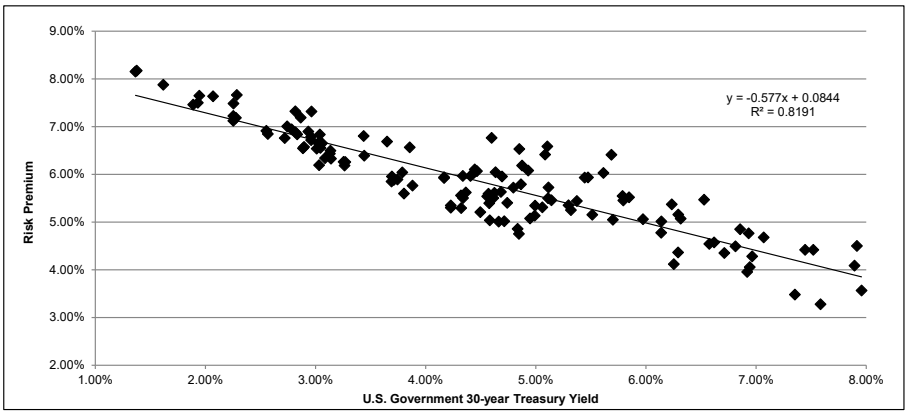
BOND YIELD PLUS RISK PREMIUM ANALYSIS
Risk Premium -- Natural Gas Utilities (US)

	[1] Average Authorized Gas ROE	[2] U.S. Govt. 30-year Treasury	[3] Risk Premium
1992.1	12.42%	7.92%	4.50%
1992.2	11.98%	7.89%	4.09%
1992.3	11.87%	7.45%	4.42%
1992.4	11.94%	7.52%	4.42%
1993.1	11.75%	7.07%	4.68%
1993.2	11.71%	6.86%	4.85%
1993.3	11.39%	6.31%	5.07%
1993.4	11.16%	6.14%	5.02%
1994.1	11.12%	6.57%	4.55%
1994.2	10.84%	7.35%	3.48%
1994.3	10.87%	7.58%	3.28%
1994.4	11.53%	7.96%	3.57%
1995.2	11.00%	6.94%	4.06%
1995.3	11.07%	6.71%	4.35%
1995.4	11.61%	6.23%	5.37%
1996.1	11.45%	6.29%	5.16%
1996.2	10.88%	6.92%	3.96%
1996.3	11.25%	6.96%	4.29%
1996.4	11.19%	6.62%	4.58%
1997.1	11.31%	6.81%	4.49%
1997.2	11.70%	6.93%	4.77%
1997.3	12.00%	6.53%	5.47%
1997.4	10.92%	6.14%	4.78%
1998.2	11.37%	5.85%	5.52%
1998.3	11.41%	5.47%	5.94%
1998.4	11.69%	5.10%	6.59%
1999.1	10.82%	5.37%	5.44%
1999.2	11.25%	5.79%	5.46%
1999.4	10.38%	6.25%	4.12%
2000.1	10.66%	6.29%	4.36%
2000.2	11.03%	5.97%	5.06%
2000.3	11.33%	5.79%	5.55%
2000.4	12.10%	5.69%	6.41%
2001.1	11.38%	5.44%	5.93%
2001.2	10.75%	5.70%	5.05%
2001.4	10.65%	5.30%	5.35%
2002.1	10.67%	5.51%	5.15%
2002.2	11.64%	5.61%	6.03%
2002.3	11.50%	5.08%	6.42%
2002.4	11.01%	4.93%	6.08%
2003.1	11.38%	4.85%	6.53%
2003.2	11.36%	4.60%	6.76%
2003.3	10.61%	5.11%	5.50%
2003.4	10.84%	5.11%	5.73%
2004.1	11.06%	4.88%	6.18%
2004.2	10.57%	5.32%	5.25%
2004.3	10.37%	5.06%	5.31%
2004.4	10.66%	4.86%	5.79%
2005.1	10.65%	4.69%	5.96%
2005.2	10.54%	4.47%	6.07%
2005.3	10.47%	4.44%	6.03%
2005.4	10.32%	4.68%	5.63%
2006.1	10.68%	4.63%	6.05%
2006.2	10.60%	5.14%	5.46%
2006.3	10.34%	4.99%	5.34%
2006.4	10.14%	4.74%	5.40%
2007.1	10.52%	4.80%	5.72%
2007.2	10.13%	4.99%	5.14%
2007.3	10.03%	4.95%	5.08%
2007.4	10.12%	4.61%	5.50%
2008.1	10.38%	4.41%	5.97%
2008.2	10.17%	4.57%	5.60%
2008.3	10.55%	4.44%	6.11%
2008.4	10.34%	3.65%	6.69%
2009.1	10.24%	3.44%	6.81%
2009.2	10.11%	4.17%	5.94%
2009.3	9.88%	4.32%	5.56%
2009.4	10.31%	4.34%	5.97%
2010.1	10.24%	4.62%	5.61%
2010.2	9.99%	4.36%	5.62%
2010.3	10.43%	3.86%	6.57%
2010.4	10.09%	4.17%	5.93%
2011.1	10.10%	4.56%	5.54%
2011.2	9.85%	4.34%	5.51%
2011.3	9.65%	3.69%	5.96%
2011.4	9.88%	3.04%	6.84%
2012.1	9.63%	3.14%	6.50%
2012.2	9.83%	2.93%	6.90%
2012.3	9.75%	2.74%	7.01%
2012.4	10.06%	2.86%	7.19%
2013.1	9.57%	3.13%	6.44%
2013.2	9.47%	3.14%	6.33%
2013.3	9.60%	3.71%	5.89%
2013.4	9.83%	3.79%	6.04%
2014.1	9.54%	3.69%	5.85%
2014.2	9.84%	3.44%	6.39%
2014.3	9.45%	3.26%	6.19%

BOND YIELD PLUS RISK PREMIUM ANALYSIS
Risk Premium -- Natural Gas Utilities (US)

	[1] Average Authorized Gas ROE	[2] U.S. Govt. 30-year Treasury	[3] Risk Premium
2014.4	10.28%	2.96%	7.32%
2015.1	9.47%	2.55%	6.91%
2015.2	9.43%	2.88%	6.55%
2015.3	9.75%	2.96%	6.79%
2015.4	9.68%	2.96%	6.72%
2016.1	9.48%	2.72%	6.76%
2016.2	9.42%	2.57%	6.85%
2016.3	9.47%	2.28%	7.19%
2016.4	9.67%	2.83%	6.84%
2017.1	9.60%	3.04%	6.56%
2017.2	9.47%	2.90%	6.58%
2017.3	10.14%	2.82%	7.32%
2017.4	9.70%	2.82%	6.88%
2018.1	9.68%	3.02%	6.66%
2018.2	9.43%	3.09%	6.34%
2018.3	9.71%	3.06%	6.65%
2018.4	9.53%	3.27%	6.26%
2019.1	9.55%	3.01%	6.54%
2019.2	9.73%	2.78%	6.94%
2019.3	9.95%	2.29%	7.66%
2019.4	9.74%	2.25%	7.48%
2020.1	9.35%	1.89%	7.46%
2020.2	9.55%	1.38%	8.17%
2020.3	9.52%	1.37%	8.15%
2020.4	9.50%	1.62%	7.88%
2021.1	9.71%	2.07%	7.64%
2021.2	9.48%	2.25%	7.22%
2021.3	9.43%	1.93%	7.50%
2021.4	9.59%	1.94%	7.65%
2022.1	9.38%	2.25%	7.12%
2022.2	9.23%	3.03%	6.19%
2022.3	9.52%	3.26%	6.26%
2022.4	9.65%	3.88%	5.77%
2023.1	9.64%	3.74%	5.89%
2023.2	9.40%	3.80%	5.60%
2023.3	9.53%	4.23%	5.30%
2023.4	9.62%	4.58%	5.04%
2024.1	9.62%	4.32%	5.29%
2024.2	9.97%	4.58%	5.40%
2024.3	9.58%	4.23%	5.35%
2024.4	9.70%	4.50%	5.21%
2025.1	9.73%	4.71%	5.02%
2025.2	9.69%	4.83%	4.86%
2025.3	9.60%	4.85%	4.75%
2025.4	9.67%	4.66%	5.01%
AVERAGE	10.34%	4.49%	5.85%
MEDIAN	10.14%	4.56%	5.89%

BOND YIELD PLUS RISK PREMIUM ANALYSIS
Risk Premium -- Natural Gas Utilities (US)



SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.905023343
R Square	0.819067251
Adjusted R Square	0.817675461
Standard Error	0.004290574
Observations	132

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	0.010833693	0.010833693	588.4990054	4.22052E-50
Residual	130	0.002393173	1.8409E-05		
Total	131	0.013226866			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*
Intercept	0.084434499	0.001131139	74.64555008	1.2996E-108	0.082196675	0.08667232
U.S. Gov. 30-Year Treasury	-0.576995401	0.023784799	-24.25899844	4.22052E-50	-0.624050781	-0.52994

	[7] U.S. Govt. 30-year Treasury	[8] Risk Premium	[9] ROE
Current 30-day average of 30-year U.S. Treasury bond yield [4]	4.66%	5.76%	10.41%
Blue Chip Near-Term Projected Forecast (Q1 2026 - Q1 2027) [5]	4.60%	5.79%	10.39%
Blue Chip Long-Term Projected Forecast (2027-2031) [6]	4.60%	5.79%	10.39%
AVERAGE			10.40%

Notes:
[1] Source: Regulatory Research Associates, rate cases through November 28, 2025
[2] Source: Bloomberg Professional, quarterly bond yields are the average of each trading day in the quarter
[3] Equals Column [1] − Column [2]
[4] Source: Bloomberg Professional, 30-day average as of November 28, 2025
[5] Source: Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025 at 2
[6] Source: Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025 at 14
[7] See notes [4], [5] & [6]
[8] Equals 0.084434 + (-0.576995 x Column [7])
[9] Equals Column [7] + Column [8]

NATIONAL FUEL EXHIBIT JCN-8

COMPARATIVE SIZE ANALYSIS
Proxy Group Market Capitalization and Market-to-Book Ratio

Company	Ticker	[1] Market Capitalization ($ millions)	[2] Market-to-Book Ratio
Atmos Energy Corporation	ATO	28,223.11	2.10
New Jersey Resources Corporation	NJR	4,645.49	1.92
NiSource Inc.	NI	20,544.21	2.27
Northwest Natural Holding Co.	NWN	1,949.55	1.35
ONE Gas Inc.	OGS	4,916.13	1.54
Southwest Gas Holdings, Inc.	SWX	5,793.30	1.52
Spire, Inc.	SR	5,167.00	1.61
Average		$10,177	1.76
Median		$5,167	1.61

National Fuel Gas Distribution Corporation	
Common Equity ($ millions) [3]	$ 768.21
Implied Market Capitalization [4]	1,235.78
As a percent of Proxy Group Median Market Capitalization	23.92%

Notes:
[1] Source: S&P Capital IQ; equals 30-day average as of November 28, 2025
[2] Source: S&P Capital IQ; equals 30-day average as of November 28, 2025
[3] Source: Company data
[4] Equals [3] x proxy group median market-to-book ratio

COMPARATIVE SIZE ANALYSIS
Kroll Cost of Capital Navigator - Size Premium

Breakdown of Deciles 1-10		[5] Market Capitalization of Largest Company ($ millions)	[6] Size Premium
1-Largest		$ 3,522,211.14	-0.01%
2		$ 46,949.06	0.33%
3		$ 20,178.36	0.49%
4		$ 9,937.35	0.50%
5	**Proxy Group Median**	$ 6,181.27	0.74%
6		$ 3,946.15	1.00%
7		$ 2,464.50	1.19%
8	**National Fuel Gas Distribution Corp.**	$ 1,417.45	0.88%
9		$ 729.92	1.73%
10-Smallest		$ 304.48	4.47%
Proxy Group Median		$ 5,167.00	0.74%
8th Decile Size Premium		$ 1,235.78	0.88%
		Difference from Proxy Group Median	0.14%

Notes:
[5] 2025 Kroll Cost of Capital Navigator - Size Premium: Annual Data as of 12/31/2024

[6] 2025 Kroll Cost of Capital Navigator - Size Premium: Annual Data as of 12/31/2024

NATIONAL FUEL EXHIBIT JCN-9

COMPARISON OF REGULATORY FRAMEWORK AND PROXY GROUP COMPANIES
RISK ASSESSMENT

		[1]	[2]		[3]	[4]	
Company	**Jurisdiction/Service**	**Test Year**	**Rate Base**		**Revenue Decoupling (RDM)**	**Capital Cost Recovery Mechanism (CCRM)**	
Atmos Energy Corporation	Kansas - Gas	Historical	Year End		Partial		Yes
	Kentucky - Gas	Fully Forecast	Average		Partial		Yes
	Louisiana - Gas	Partially Forecast	Average		Partial		No
	Mississippi - Gas	Historical	Year End		Partial		Yes
	Tennessee - Gas	Historical	Average		Partial		No
	Texas - Gas	Historical	Year End		Partial		Yes
New Jersey Resources Corporation	New Jersey - Gas	Partially Forecast	Year End		Partial		Yes
NiSource Inc.	Indiana - Gas	Partially Forecast	Year End		Partial		Yes
	Kentucky - Gas	Fully Forecast	Average		Partial		Yes
	Maryland - Gas	Historical	Average		Partial		Yes
	Ohio - Gas	Partially Forecast	Date Certain		No		Yes
	Pennsylvania - Gas	Fully Forecast	Year End		Partial		Yes
	Virginia - Gas	Fully Forecast	Average		Partial		Yes
Northwest Natural Holding Co.	Oregon - Gas	Fully Forecast	Average		Partial		Yes
	Washington - Gas	Historical	Average		No		No
ONE Gas, Inc.	Kansas - Gas	Historical	Year End		Partial		Yes
	Oklahoma - Gas	Historical	Year End		Partial		No
	Texas - Gas	Historical	Year End		Partial		Yes
Southwest Gas Holdings, Inc.	Arizona - Gas	Historical	Year End		Full		Yes
	California - Gas	Fully Forecast	Average		Full		No
	Nevada - Gas	Historical	Year End		Full		Yes
Spire, Inc.	Spire Alabama Inc. (AL)	Historical	Year End		Partial		No
	Spire Gulf Inc. (AL)	Historical	Year End		Partial		No
	Spire Missouri Inc. (MO)	Historical	Year End		Partial		Yes
Proxy Group Operating Company Count	Fully Forecast	6	Year End	14	Full	3	Yes	17
	Partially Forecast	4	Average	9	Partial	17	No	7
	Historical	14	Date Certain	1	No	2		
	Forecast	41.67%	Year End	58.33%	RDM	90.91%	CCRM	70.83%
National Fuel Gas Distribution Corp.	Pennsylvania	Forecast	Year End		Partial		Yes

Notes
[1] - [2] Source: S&P Capital IQ, Regulatory Research Associates, Rate Case History
[3] - [4] Source: "Adjustment Clauses: A State-by-state Overview," Regulatory Research Associates, September 2025. Operating subsidiaries not covered in this report were excluded from this exhibit.

NATIONAL FUEL EXHIBIT JCN-10

CAPITAL STRUCTURE ANALYSIS

COMMON EQUITY RATIO [1]

Proxy Group Company	Ticker	2024	2023	2022	Average
Atmos Energy Corp.	ATO	60.26%	60.20%	60.01%	60.16%
New Jersey Resources Corporation	NJR	55.92%	55.15%	53.98%	55.01%
NiSource Inc.	NI	54.89%	55.44%	54.17%	54.83%
Northwest Natural Holding Co.	NWN	49.60%	47.26%	53.27%	50.05%
ONE Gas, Inc.	OGS	58.96%	60.41%	58.24%	59.21%
Southwest Gas Holdings, Inc.	SWX	48.13%	47.45%	43.96%	46.51%
Spire, Inc.	SR	52.99%	51.91%	57.15%	54.02%
Proxy Group					
MEAN		54.39%	53.98%	54.40%	54.26%
MEDIAN		54.89%	55.15%	54.17%	54.83%
LOW		48.13%	47.26%	43.96%	46.51%
HIGH		60.26%	60.41%	60.01%	60.16%

COMMON EQUITY RATIO - UTILITY OPERATING COMPANIES [2]

Company Name	Ticker	2024	2023	2022	Average
Atmos Energy Corporation	ATO	60.26%	60.20%	60.01%	60.16%
New Jersey Natural Gas Company	NJR	55.92%	55.15%	53.98%	55.01%
Columbia Gas of Kentucky, Incorporated	NI	51.44%	53.66%	54.91%	53.34%
Columbia Gas of Maryland, Incorporated	NI	52.00%	52.00%	51.96%	51.99%
Columbia Gas of Ohio, Inc.	NI	50.27%	50.50%	50.67%	50.48%
Columbia Gas of Pennsylvania, Inc.	NI	56.07%	55.88%	56.64%	56.20%
Columbia Gas of Virginia, Incorporated	NI	44.58%	45.25%	44.25%	44.69%
Northern Indiana Public Service Company, LLC	NI	58.24%	59.26%	56.92%	58.14%
Northwest Natural Gas Company	NWN	49.60%	47.26%	53.27%	50.05%
Kansas Gas Service Company, Inc.	OGS	59.53%	60.44%	58.37%	59.45%
Oklahoma Natural Gas Company	OGS	59.23%	60.46%	58.26%	59.32%
Texas Gas Service Company, Inc.	OGS	58.22%	60.35%	58.13%	58.90%
Southwest Gas Corporation	SWX	48.13%	47.45%	43.96%	46.51%
Spire Alabama Inc.	SR	55.84%	55.31%	61.18%	57.44%
Spire Gulf Inc.	SR	48.89%	46.42%	51.61%	48.97%
Spire Missouri Inc.	SR	51.95%	50.66%	55.55%	52.72%
Operating Company					
MEAN		53.76%	53.76%	54.35%	53.96%
MEDIAN		53.92%	54.40%	55.23%	54.18%
LOW		44.58%	45.25%	43.96%	44.69%
HIGH		60.26%	60.46%	61.18%	60.16%

Notes:
Sources: Operating Company Annual LDC Reports; S&P Capital IQ
[1] Ratios are weighted by actual common equity and total long-term debt of operating subsidiaries.
[2] Spire Mississippi was excluded because it does not report long-term debt.

CAPITAL STRUCTURE ANALYSIS

LONG-TERM DEBT RATIO [1]

Proxy Group Company	Ticker	2024	2023	2022	Average
Atmos Energy Corp.	ATO	39.74%	39.80%	39.99%	39.84%
New Jersey Resources Corporation	NJR	44.08%	44.85%	46.02%	44.99%
NiSource Inc.	NI	45.11%	44.56%	45.83%	45.17%
Northwest Natural Holding Co.	NWN	50.40%	52.74%	46.73%	49.95%
ONE Gas, Inc.	OGS	41.04%	39.59%	41.76%	40.79%
Southwest Gas Holdings, Inc.	SWX	51.87%	52.55%	56.04%	53.49%
Spire, Inc.	SR	47.01%	48.09%	42.85%	45.98%
Proxy Group					
MEAN		45.61%	46.02%	45.60%	45.74%
MEDIAN		45.11%	44.85%	45.83%	45.17%
LOW		39.74%	39.59%	39.99%	39.84%
HIGH		51.87%	52.74%	56.04%	53.49%

LONG-TERM DEBT RATIO - UTILITY OPERATING COMPANIES [2]

Company Name	Ticker	2024	2023	2022	Average
Atmos Energy Corporation	ATO	39.74%	39.80%	39.99%	39.84%
New Jersey Natural Gas Company	NJR	44.08%	44.85%	46.02%	44.99%
Columbia Gas of Kentucky, Incorporated	NI	48.56%	46.34%	45.09%	46.66%
Columbia Gas of Maryland, Incorporated	NI	48.00%	48.00%	48.04%	48.01%
Columbia Gas of Ohio, Inc.	NI	49.73%	49.50%	49.33%	49.52%
Columbia Gas of Pennsylvania, Inc.	NI	43.93%	44.12%	43.36%	43.80%
Columbia Gas of Virginia, Incorporated	NI	55.42%	54.75%	55.75%	55.31%
Northern Indiana Public Service Company, LLC	NI	41.76%	40.74%	43.08%	41.86%
Northwest Natural Gas Company	NWN	50.40%	52.74%	46.73%	49.95%
Kansas Gas Service Company, Inc.	OGS	40.47%	39.56%	41.63%	40.55%
Oklahoma Natural Gas Company	OGS	40.77%	39.54%	41.74%	40.68%
Texas Gas Service Company, Inc.	OGS	41.78%	39.65%	41.87%	41.10%
Southwest Gas Corporation	SWX	51.87%	52.55%	56.04%	53.49%
Spire Alabama Inc.	SR	44.16%	44.69%	38.82%	42.56%
Spire Gulf Inc.	SR	51.11%	53.58%	48.39%	51.03%
Spire Missouri Inc.	SR	48.05%	49.34%	44.45%	47.28%
Operating Company					
MEAN		46.24%	46.24%	45.65%	46.04%
MEDIAN		46.08%	45.60%	44.77%	45.82%
LOW		39.74%	39.54%	38.82%	39.84%
HIGH		55.42%	54.75%	56.04%	55.31%

Notes:
Sources: Operating Company Annual LDC Reports; S&P Capital IQ
[1] Ratios are weighted by actual common equity and total long-term debt of operating subsidiaries.
[2] Spire Mississippi was excluded because it does not report long-term debt.

NATIONAL FUEL EXHIBIT D

COST OF SERVICE STUDY

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

EXHIBIT D

ALLOCATED COST OF SERVICE STUDY
FULLY PROJECTED FUTURE TEST YEAR
ENDED OCTOBER 31, 2027

Witness: John D. Taylor

ATRIUM ECONOMICS
CENTERED ON ENERGY

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I. INTRODUCTION

The purpose of this document is to discuss the development and results of the Allocated Cost of Service Study ("ACOSS") model and related schedules prepared for National Fuel Gas Distribution Corporation ("National Fuel" or the "Company") based on the Fully Projected Future Test Year ended October 31, 2027 ("FPFTY").

The document is organized into three sections. The first section discusses the purpose of cost allocation and includes an overview of Atrium's ACOSS model used to develop the cost allocation study. The second section, National Fuel Cost of Service Procedures, includes details of the methodologies adopted in the development of the study. The last section presents the results of the cost-of-service allocation.

1. Purpose of Cost Allocation

The purpose of an ACOSS is to determine the cost-of-service responsibilities of each customer class upon which the base rates may be established. The revenue requirement studies provide the overall level of costs of providing service, while the ACOSS is used to change the basic rate structures and/or the relative overall cost responsibility of each customer class. Based on the functionalization and classification of costs and allocation methodologies used in the ACOSS, the revenue requirement by customer class is determined and used in designing the Company's proposed base rates. In other words, the ACOSS measures each class's contribution to the Company's overall cost of service. Comparing the costs to serve any customer class with that class's rate revenues provides a measure of the return realized from that class and their associated revenue-to-cost ratio. This allows for a comparison across classes to ascertain the presence and extent of interclass subsidization (i.e., when one class pays more than its cost to serve and another pays less than its cost to serve).

2. ACOSS Procedures

Cost of service studies utilize a three-step process: functionalization, classification, and allocation.

In the first step, the functionalization sets off with assigning the Federal Energy Regulatory Commission ("FERC") plant accounts and associated investment balances to appropriate cost of service functions, such as Production, Distribution, On-Site and Metering, Customer Services, and Gas Supply. The expenses related to particular property investments or groups of investments can often follow the same functionalization and are allocated based on the ratios of gas plant assigned to each function. These plant ratios can be used to functionalize most other cost items.

In the second step, classification, each functional cost category is further separated by cost causation. There are three basic cost-defining characteristics of natural gas services: demand, commodity, and customer.

- Demand (Capacity) related costs are associated with the peak usage of the utility system. These costs are necessary to maintain the system at a level sufficient to satisfy the greatest demand that all the customers could place upon the system.
- Commodity-related costs are variable costs that vary with the quantity of gas consumed. These costs reflect the number of units consumed or supplied during a period of time.

- Customer-related costs are associated with serving customers regardless of their usage or demand characteristics. Customer-related costs are incurred to attach a customer to the distribution system, meter any gas usage and maintain the customer's account. Customer costs are a function of the number of customers served and continue to be incurred whether or not the customer uses any gas. They generally include capital costs associated with minimum size distribution mains, services, meters, regulators and customer service and accounting expenses.

The last step is to allocate these cost components among customer classes. An analysis of the utility's records may indicate specific costs that should be isolated and directly assigned to a particular customer or group of customers in the same class of service. Direct assignments best reflect the cost causation characteristics of serving individual customers or groups of customers. Therefore, in performing an ACOSS, the cost analyst seeks to maximize the amount of plant and expense directly assigned to particular customer groups to avoid the need to rely upon other more generalized allocation methods. Where costs cannot be directly assigned, the development of allocation factors by customer class use principles of both economics and engineering. This results in appropriate allocation factors for different elements of costs based on cost causation.

3. Atrium Economics Cost of Service Study Model Overview

The ACOSS is submitted in support of the direct testimony of John D. Taylor as Schedule 6. The ACOSS model presented in this proceeding is a Microsoft Excel based model that allows the user to modify various inputs and assumptions.

ACOSS Model Capabilities

The Atrium Economics' ACOSS model provides a large range of analytical capabilities including:

- Unbundling of operations into functions: (i.e. production/supply, storage, transmission, distribution, metering, and billing services.)
- Classification and allocation of costs into customer classes.
- Reports on Rate of Return, Revenue Requirement, and Revenue-to-Cost ratio for each function and rate class.
- Development of unit costs of each functional classification for each rate class.
- Specification of the individual rate of return targets for each function or customer class.
- Provides detailed analyses of costs of gas, income taxes, working capital, depreciation reserve, and depreciation expenses.
- Use of detailed analysis of labor expenses by account to facilitate the analyses of administrative and general expenses and overhead costs.
- Facilitation of direct assignment of plant investment, expenses, and revenue dollars to individual functions, classifications, or customer classes.

Follows Standard 3-Step Allocation

The Atrium ACOSS Model follows the standard three-step analysis process:1) functionalization of rate base and expenses into various functional categories; 2) classification of functionalized

components into demand, energy/commodity, and customer cost categories; and 3) allocation of each component among the customer classes.

As part of the functionalization process, accounts for common costs that are not specifically related to the primary functions, such as general plant and administrative and general expenses, are automatically allocated to the proper function based on internally defined allocation factors. All components of the utility's total cost of service are grouped into one of the functions.

The Atrium ACOSS Model provides unbundled functionalized and classified cost information by customer class; develops unbundled revenue requirements by functional classification for each customer class; and calculates unit costs by function for customer, commodity, and demand categories. Accounting costs are reported by the FERC account level, and the allocation of administrative and general ("A&G") expenses, general taxes, and income taxes are clearly reported.

Revenue requirements are calculated from the allocated rate base and expenses and are adjusted to reflect the user-determined target rate of return and statutory tax adjustments. The actual revenues collected are compared to the calculated cost-based revenue requirements to determine class-specific, revenue-to-cost ratios to assist in revenue allocation and pricing activities.

Unit Cost Output Functionality

The ACOSS model calculates the unit cost of each functional classification separately for each rate class based on the user-specified billing determinants. These unit cost data are among the most important outputs from an embedded cost of service analysis. They are defined as the average cost of providing service to customers per measure of service (i.e., per therm or ccf, per dekatherm or mcf of daily demand, and per customer). Unit costs are a key consideration in developing prices for bundled, unbundled, and re-bundled services.

Acceptance by Utility Regulatory Commissions

The format and presentation of the model's outputs have been used in many rate case proceedings and conform to standard utility commission requirements. Where necessary the ACOSS model outputs can be easily modified to meet specific jurisdictional filing requirements.

II. NATIONAL FUEL's COST OF SERVICE PROCEDURES

1. Functionalization

The following functional cost categories were identified for purposes of National Fuel's cost allocation:

- Gas Supply
- Production
- Transmission
- Distribution

- Customer

National Fuel's assigned functional categories are presented on Schedule 1.

2. Classification

The following classification categories were identified for purposes of National Fuel's cost allocation:

- Commodity
- Demand
- Customer

National Fuel's assigned classification categories are presented on Schedule 1.

3. Allocation

The allocation step involves assigning classified costs to the customer classes based on cost causation. Therefore, the allocation of costs is usually based on some measure of class loads or class service characteristics. The External and Internal Allocation Factors are utilized to allocate costs among various customer classes. National Fuel's assigned Allocation Factors are presented on Schedule 1.

3.1.Customer Classes and Tariff Schedules

The following customer classes were identified for purposes of cost allocation:

- Residential Service
- Small Commercial & PA Service (LE 250)
- Small Commercial & PA Service (GT 250)
- Large Comm PA Service
- Natural Gas Vehicles ("NGV")
- Small Volume Industrial Service ("SVIS")
- Intermediate Volume Industrial Service ("IVIS")
- Large Volume Industrial Service ("LVIS")
- Large Industrial Service ("LIS")

3.2.External Allocation Factors

National Fuel's External Allocation Factors are presented on Schedule 2. The External Allocation Factors are developed based on the special studies conducted using various detailed data.

Commodity and Revenue Allocation Factors

Costs classified as "Commodity" are allocated among customer classes based on the weather-normalized volumes for the test year.

COM - Factor developed to directly assign Weather Normalized Volumes/Throughput to the specific class in the FPFTY, based on all customers' volumes.

SALES_COM – Factor developed to directly assign Weather Normalized Volumes/Throughput to the specific class in the FPFTY, based on sales customers' volumes.

INCR_WNTR – Factor used to allocate base storage gas and calculated by taking the difference between average winter daily volumes and average summer daily volumes for sales customers.

GASCOST – Factor developed to directly assign associated gas costs and revenues to the specific class in the FPFTY.

REV – Factor developed to directly assign associated current base rate revenues to the specific class in the FPFTY.

REV_DSCNT – Factor derived to allocate forfeited discounts to the specific class on a historical basis.

Customer Allocation Factors

Customer-related costs are generally allocated based on the number of customers within each class of service, with appropriate weighting to recognize specific service characteristics.

CUST – Factor based on the average number of customers per customer class in the FPFTY.

MTRS – Factor based on the weighted customer unit cost of meters used to serve gas customers in different rate classes. The analysis relies upon the Company's records, which provide an inventory of each type and size of meter for a specific rate schedule, and the records of FERC Account 381 investment balances. The original cost data was restated in terms of current cost using Handy-Whitman indices for meters to determine current unit cost. Next, the derived average meter current cost was linked to the meter records dataset to develop the total current cost of the investment for each customer class. Then the relative customer class unit cost was developed and multiplied by the forecasted customer count for each customer class.

M&R – The Company's property records were used to directly assign investment of FERC Account 385 to the appropriate customer classifications. The factor was derived based on the allocated historical investment cost.

SERV – The analysis relies upon the data contained in the Company's property records which provide an inventory and original cost of the service lines, and additional distribution records that provide data on customer classes and service lines by diameter. The method employed to develop the service allocator was similar to that used for the meter allocator.

ACT_904 – Uncollectible Account - The factor is based on the historical statistics related to uncollectable accounts.

Demand Allocation Factors

Demand-related costs are generally allocated based on peak capacity demand for each customer class.

DEMAND (PDAY) – The factor is based on Peak Day capacity demand for each customer class.

PEAK_AVRG – The factor is based on the weighting of the factors derived from average weather normalized throughput volumes (COM) and from the Peak Day capacity demand factor (PDAY) for each customer class.

CUST_DEMAND – The composite factor is based on the CUST and DEMAND factors prorated to the customer and demand components determined in Mains Analysis.

Mains Analysis

The allocation of investment in facilities serving a distribution function should recognize that the cost of these facilities is driven by two principal factors. First is the cost of extending the system to connect individual customers. Second is the cost associated with the capacity requirements of the customers connected.

There are two widely accepted methods for the classification of mains between customer-related costs and demand-related costs. The two methods are the Minimum System Method and the Zero Intercept Method, both relying on the Company's property record data to determine the cost of pipe by size and type. The unit cost for pipe in any year is determined by dividing the booked costs by the amount of pipe installed in a standard unit of measurement. A variety of factors, such as the length of pipe installed, location, installation conditions, etc., cause the annual unit cost of pipe by size and type to vary significantly. Thus, a simple average of the yearly costs is not adequate for a determination of the cost for each size of the pipe as it will not reflect a consistent set of data. Therefore, the original cost data was restated in terms of current cost using the Handy-Whitman index.

Minimum System Study:

The minimum system study is based on a selected minimum plastic pipe size of 2" and minimum steel pipe size of 2" and associated current unit cost to determine a minimum system cost over the total system cost as depicted below.

Minimum System Summary

Material	Quantity	Cost 2025$	Minimum Size Cost (2025$)	Customer Component	Customer Component Percentage
Plastic	17,245,444	$666,658,923	$29.60	$510,404,171	76.6%
Steel	7,086,234	$674,600,477	$45.68	$323,683,034	48.0%
Total	**24,331,678**	**$1,341,259,399**		**$834,087,205**	**62.2%**

Zero Intercept Study:

The zero intercept study was performed using a Weighted Linear Regression on the cost per foot by pipe diameter. Based on this relationship, the study estimates the cost of installing a hypothetical pipe with zero capacity, which is where the estimated diameter is zero (i.e., the zero-

intercept). The zero-intercept determined value is then multiplied by all quantities of distribution mains currently installed by the utility to arrive at a total minimum system cost. Total minimum system cost divided by total system cost derives the portion of the system that is considered a fixed investment and is classified as customer-related.

Zero-Intercept Summary

Material	Quantity	Cost 2025$	Zero-Intercept Cost (2025$)	Customer Component	Customer Component Percentage
Plastic	17,245,444	$ 666,658,923	$ 25.60	$ 441,467,384	66.2%
Steel	7,086,234	$ 674,600,477	$ 52.91	$ 374,936,509	55.6%
Total	**24,331,678**	**$ 1,341,259,399**		**$ 816,403,894**	**60.9%**

The distribution main investment is functionalized to distribution, classified based on the results of the zero-intercept study to demand (39.1%) and customer (60.9%). The demand component of the mains investment is allocated based on each class' allocation of peak day. The customer component of the mains investment is allocated based on each class' number of customers.

3.3.Internal Allocation Factors

National Fuel's Internal Allocation Factors are presented on Schedule 3. Internal Allocation Factors are developed within the ACOSS model based on the cost ratios of allocated cost using the external allocation factors.

INT_RATEBASE – Total Rate Base – The factor is based on the derived rate base by customer class.

INT_REV_REQ – Total Revenue Requirement – The factor is based on the derived revenue requirement by customer class.

INT_REQ_INCOME – Required Return on Rate Base – The factor is based on the derived customer class required return on the rate base.

INT_TOTPLT – Production Plant Total - The factor is based on the allocated total plant balance by customer class.

INT_PRODPT – Total Plant - The factor is based on the allocated Production plant balance by customer class.

INT_PROD_TRANSM_DIST_SUBTOTAL – Production, Transmission, and Distribution Plant Total- The factor is based on the allocated Production, Transmission, and Distribution plant balance by customer class.

INT_DIST_SUBTOTAL – Distribution Plant Subtotal – The factor is based on the allocated Distribution plant balance by customer class excluding FERC Account 375, Structures and Improvements.

INT_DISTPT – Distribution Plant Total – The factor is based on the allocated total Distribution plant balance by customer class.

INT_DMAINS_SERV – Distribution Plant Mains and Services – The factor is based on the allocated plant balances by customer class of FERC Accounts 376 and 380, Mains and Services.

INT_GENPLT – General Plant Total – The factor is based on the allocated total General plant balance by customer class.

INT_TRANSPT – Transmission Plant Total – The factor is based on the allocated total Transmission plant balance by customer class.

INT_CUSTACC – Customer Account – The factor is based on the total customer class allocated Customer Account expenses excluding FERC Account 901 and 905, Supervision and Miscellaneous Customer Accounts expenses.

INT_OM_DIST_SUBTOTAL – Distribution Operation and Maintenance Expense Subtotal – The factor is based on the total customer class allocated Distribution Operation and Maintenance Expenses, excluding FERC Accounts 870, 880, 881, 885, and 894, Operation supervision and engineering, Other Expenses, Rents, Maintenance Supervision and Engineering, and Maintenance of other Equipment.

INT_OM_Excl_A&G – Operation and Maintenance Expense excluding Administrative and General Expenses – The factor is based on the total customer class allocated Operation and Maintenance Expenses, excluding Administrative and General Expenses.

INT_OML – Operation and Maintenance Labor Expense Total – The factor is based on the total customer class allocated labor-related Operation and Maintenance Expenses.

INT_DIST_OL - Distribution related Operation Labor Expense subtotal - The factor is based on the customer class allocated Distribution labor-related Operation and Maintenance Expenses

INT_DIST_ML - Distribution related Maintenance Labor Expense subtotal - The factor is based on the customer class allocated Distribution labor-related Maintenance Expenses.

III. NATIONAL FUEL'S COST OF SERVICE RESULTS

1. Schedule 1 - Account Balances and Allocation Methods
2. Schedule 2 - External Allocation Factors
3. Schedule 3 - Internal Allocation Factors
4. Schedule 4 - Comparison of Cost of Service with Revenues Under Present and Proposed Rates
5. Schedule 5 - Cost of Service and Rate of Return Under Present and Proposed Rates
6. Schedule 6 - Cost of Service Allocation Study Fully Projected Future Test Year
7. Schedule 7 - Functionalized and Classified Rate Base and Revenue Requirement, and Unit Costs by Customer Class

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ending October 31, 2027
SCHEDULE 1 - ACCOUNT BALANCES AND ALLOCATION METHODS
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
1	**RATE BASE**								
2	**Plant in Service**								
3	**Intangible Plant**								
4	Organization	301.0	-	INT_PROD_TRANSM_DIST_SUBTOTAL					
5	Franchises & Consents	302.0	-	INT_PROD_TRANSM_DIST_SUBTOTAL					
6	Misc. Intangible Plant	303.0	25,789	INT_OML					
7	Subtotal - Intangible Plant		25,789						
8	**Natural Gas Production Plant**								
9	Land and Land Rights	325.0	60		PRODUCTION	COMMODITY		SALES_COM	
10	Structures and Improvements	328.0	12		PRODUCTION	COMMODITY		SALES_COM	
11	Mains	329.0	3		PRODUCTION	COMMODITY		SALES_COM	
12	Lines	332.0	533		PRODUCTION	COMMODITY		SALES_COM	
13	Measuring and Regulating Equipment	334.0	3,914		PRODUCTION	COMMODITY		SALES_COM	
14	Subtotal - Natural Gas Production Plant		4,522						
15	**Transmission plant**								
16	Land and Land Rights	365.1	-		TRANSMISSION	DEMAND	PDAY		
17	Rights-of-Way	365.2	3,363		TRANSMISSION	DEMAND	PDAY		
18	Structures and improvements	366.0	306		TRANSMISSION	DEMAND	PDAY		
19	Mains	367.0	92,168		TRANSMISSION	DEMAND	PDAY		
20	Measuring and regulating station equipment	369.0	10,415		TRANSMISSION	DEMAND	PDAY		
21	Subtotal - Transmission plant		106,251						
22	**Distribution Plant**								
23	Land and land rights	374.0	17,091		DISTRIBUTION	DEMAND	CUST_DEM		
24	Structures and improvements	375.0	13,912	INT_DIST_SUBTOTAL					
25	Mains	376.0	429,663		DISTRIBUTION	DEMAND	CUST_DEM		
26	Measuring and regulating station equipment—general	378.0	11,812		DISTRIBUTION	DEMAND	CUST_DEM		
27	Measuring and regulating station equipment—city gate check stations	379.0	-						
28	Services	380.0	245,617		CUSTOMER	CUSTOMER			SERV
29	Meters	381.0	18,771		CUSTOMER	CUSTOMER			MTRS
30	Meter installations	382.0	3,769		CUSTOMER	CUSTOMER			MTRS
31	House regulators	383.0	-						
32	House regulatory installations	384.0	1,311		CUSTOMER	CUSTOMER			MTRS
33	Industrial measuring and regulating station equipment	385.0	20,008		CUSTOMER	CUSTOMER			M&R
34	Subtotal - Distribution Plant		761,953						
35	**General Plant**								
36	Land and Land Rights	389.0	-	INT_OML					
37	Structures and Improvements	390.0	1,444	INT_OML					
38	Office Furniture and Equipment	391.0	9,989	INT_OML					
39	Transportation Equipment	392.0	17,271	INT_OML					
40	Tools, Shop, and Garage Equipment	394.0	12,168	INT_OML					
41	Laboratory Equipment	395.0	-						
42	Power Operated Equipment	396.0	12,847	INT_OML					
43	Communication Equipment	397.0	5,002	INT_OML					
44	Misc. Equipment	398.0	-						
45	Other Intangible Property	399.0	-						
46	Subtotal - General Plant		58,721						
47	**Total Plant in Service**		957,237						

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ending October 31, 2027
SCHEDULE 1 - ACCOUNT BALANCES AND ALLOCATION METHODS
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
48	**Accumulated Depreciation & Amortization Expense**								
49	**Intangible Plant**								
50	Organization	301.0	-	INT_PROD_TRANSM_DI	-	-	-	-	-
51	Franchises & Consents	302.0	-	INT_PROD_TRANSM_DI	-	-	-	-	-
52	Misc. Intangible Plant	303.0	(22,959)	INT_OML	-	-	-	-	-
53	Subtotal - Intangible Plant		(22,959)						
54	**Natural Gas Production Plant**								
55	Land and Land Rights	325.0	(35)	-	PRODUCTION	COMMODITY	-	SALES_COM	-
56	Structures and Improvements	328.0	(10)	-	PRODUCTION	COMMODITY	-	SALES_COM	-
57	Mains	329.0	(1)	-	PRODUCTION	COMMODITY	-	SALES_COM	-
58	Lines	332.0	(175)	-	PRODUCTION	COMMODITY	-	SALES_COM	-
59	Measuring and Regulating Equipment	334.0	(1,777)	-	PRODUCTION	COMMODITY	-	SALES_COM	-
60	Subtotal - Natural Gas Production Plant		(1,998)						
61	**Transmission plant**								
62	Land and Land Rights	365.1	-	0	TRANSMISSION	DEMAND	PDAY	-	-
63	Rights-of-Way	365.2	(699)	0	TRANSMISSION	DEMAND	PDAY	-	-
64	Structures and improvements	366.0	(125)	0	TRANSMISSION	DEMAND	PDAY	-	-
65	Mains	367.0	(23,289)	0	TRANSMISSION	DEMAND	PDAY	-	-
66	Measuring and regulating station equipment	369.0	(4,442)	0	TRANSMISSION	DEMAND	PDAY	-	-
67	Subtotal - Transmission plant		(28,555)						
68	**Distribution Plant**								
69	Land and land rights	374.0	(3,405)	0	DISTRIBUTION	DEMAND	CUST_DEM	-	-
70	Structures and improvements	375.0	(6,914)	INT_DIST_SUBTOTAL	0	0	0	-	-
71	Mains	376.0	(121,367)	0	DISTRIBUTION	DEMAND	CUST_DEM	-	-
72	Measuring and regulating station equipment—general	378.0	(4,610)	0	DISTRIBUTION	DEMAND	CUST_DEM	-	-
73	Measuring and regulating station equipment—city gate check stations	379.0	-	0	0	0	0	-	-
74	Services	380.0	(91,472)	0	CUSTOMER	CUSTOMER	0	-	SERV
75	Meters	381.0	(7,080)	0	CUSTOMER	CUSTOMER	0	-	MTRS
76	Meter installations	382.0	(1,965)	0	CUSTOMER	CUSTOMER	0	-	MTRS
77	House regulators	383.0	-	0	0	0	0	-	-
78	House regulatory installations	384.0	(620)	0	CUSTOMER	CUSTOMER	0	-	MTRS
79	Industrial measuring and regulating station equipment	385.0	(7,654)	0	CUSTOMER	CUSTOMER	0	-	M&R
80	Subtotal - Distribution Plant		(245,087)						
81	**General Plant**								
82	Land and Land Rights	389.0	-	INT_OML	-	-	-	-	-
83	Structures and Improvements	390.0	(157)	INT_OML	-	-	-	-	-
84	Office Furniture and Equipment	391.0	(5,423)	INT_OML	-	-	-	-	-
85	Transportation Equipment	392.0	(8,518)	INT_OML	-	-	-	-	-
86	Tools, Shop, and Garage Equipment	394.0	(2,723)	INT_OML	-	-	-	-	-
87	Laboratory Equipment	395.0	-	-	-	-	-	-	-
88	Power Operated Equipment	396.0	(3,401)	INT_OML	-	-	-	-	-
89	Communication Equipment	397.0	(1,751)	INT_OML	-	-	-	-	-
90	Misc. Equipment	398.0	-	-	-	-	-	-	-
91	Other Intangible Property	399.0	-	-	-	-	-	-	-
92	Subtotal - General Plant		(21,972)						
93	**Total Accumulated Depreciation & Amortization Expense**		(320,571)						

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ending October 31, 2027
SCHEDULE 1 - ACCOUNT BALANCES AND ALLOCATION METHODS
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
94	**Other Rate Base Items**								
95	Materials And Supplies	154.0	1,587	INT_PROD_TRANSM_DIST_SUBTOTAL					
96	Stores Expense Undistributed	163.0	-	INT_PROD_TRANSM_DIST_SUBTOTAL					
97	Gas Stored Underground - PA	164.1	5,664		PRODUCTION	COMMODITY		INCR_WNTR	
98	Gas owed to system gas	117.4	-						
99	Prepayments	165.0	1,080	INT_TOTPLT					
100	Customer deposits	235.0	(5,166)		DISTRIBUTION	CUSTOMER			CUST
101	Accumulated deferred income taxes—other property	282.0	(73,925)	INT_TOTPLT					
102	Working capital allowance	N/A	5,675	INT_OM_Excl_A&G					
103	Subtotal - Other Rate Base Items		(65,085)						
104	**TOTAL RATE BASE**		571,582						
105	**OPERATION AND MAINTENANCE EXPENSE**								
106	**Production, Storage, LNG, Transmission, and Distribution Expense**								
107	**Manufactured Gas Production Expense**								
108	Operation Supv & Engineering	750.0	0		PRODUCTION	COMMODITY		SALES_COM	
109	Field Line Expenses	753.0	20		PRODUCTION	COMMODITY		SALES_COM	
110	Field Compressor St Expenses	754.0	3		PRODUCTION	COMMODITY		SALES_COM	
111	Measuring & Regulator Expenses	756.0	0		PRODUCTION	COMMODITY		SALES_COM	
112	Purification Expenses	757.0	1		PRODUCTION	COMMODITY		SALES_COM	
113	Other Expenses	759.0	(0)		PRODUCTION	COMMODITY		SALES_COM	
114	Maint Structures & Improvement	762.0	-		PRODUCTION	COMMODITY		SALES_COM	
115	Maint Field Lines	764.0	-		PRODUCTION	COMMODITY		SALES_COM	
116	Maint Field Meas & Reg Sta Eq	766.0	(0)		PRODUCTION	COMMODITY		SALES_COM	
117	Maint Purification Equipment	767.0	0		PRODUCTION	COMMODITY		SALES_COM	
118	Maint Other Equipment	769.0	5		PRODUCTION	COMMODITY		SALES_COM	
119	**Subtotal - Manufactured Gas Production Expense**		29						

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ending October 31, 2027
SCHEDULE 1 - ACCOUNT BALANCES AND ALLOCATION METHODS
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
120	**Other Gas Supply Expenses**								
121	Natural gas field line purchases	801.0	65,714		GAS SUPPLY	COMMODITY		GASCOST	
122	Natural gas city gate purchases	804.0	54		GAS SUPPLY	COMMODITY		GASCOST	
123	Exchange gas	806.0	573		GAS SUPPLY	COMMODITY		GASCOST	
124	Well expenses—Purchased gas	807.1	189		PRODUCTION	COMMODITY		SALES_COM	
125	Operation of purchased gas measuring stations.	807.2	-		PRODUCTION	COMMODITY		SALES_COM	
126	Maintenance of purchased gas measuring stations.	807.3	-		PRODUCTION	COMMODITY		SALES_COM	
127	Purchased gas calculations expenses.	807.4	-		PRODUCTION	COMMODITY		SALES_COM	
128	Other purchased gas expenses.	807.5	-		PRODUCTION	COMMODITY		SALES_COM	
129	Gas withdrawn from storage—debit	808.1	42,369		GAS SUPPLY	COMMODITY		GASCOST	
130	Gas delivered to storage—credit	808.2	(41,357)		GAS SUPPLY	COMMODITY		GASCOST	
131	Gas used for other utility operations—credit	812.0	(39)		PRODUCTION	COMMODITY		SALES_COM	
132	**Subtotal - Other Gas Supply Expenses**		67,501						
133	**Underground Storage Expenses - Operation**								
134	Operation supervision and engineering	814.0	-						
135	Maps and records	815.0	-						
136	Wells expenses	816.0	-						
137	Lines expenses	817.0	-						
138	Compressor station expenses	818.0	-						
139	Compressor station fuel and power	819.0	-						
140	Measuring and regulating station expenses	820.0	-						
141	Purification expenses	821.0	-						
142	Exploration and development	822.0	-						
143	Gas losses	823.0	-						
144	Other expenses	824.0	-						
145	Storage well royalties	825.0	-						
146	Rents	826.0	16,746		GAS SUPPLY	COMMODITY		GASCOST	
147	Subtotal - Underground Storage Expenses - Operation		16,746						
148	**Transmission Operation Expenses**								
149	Operation supervision and engineering	850.0	2		TRANSMISSION	DEMAND	PDAY		
150	System control and load dispatching	851.0	33		TRANSMISSION	DEMAND	PDAY		
151	Communication system expenses	852.0	-						
152	Compressor station labor and expenses	853.0	5		TRANSMISSION	DEMAND	PDAY		
153	Gas for compressor station fuel	854.0	-						
154	Other fuel and power for compressor stations	855.0	-						
155	Mains expenses	856.0	662		TRANSMISSION	DEMAND	PDAY		
156	Measuring and regulating station expenses	857.0	70		TRANSMISSION	DEMAND	PDAY		
157	Transmission and compression of gas by others	858.0	40,474		GAS SUPPLY	COMMODITY		GASCOST	
158	Other expenses	859.0	46		TRANSMISSION	DEMAND	PDAY		
159	Rents	860.0	-		TRANSMISSION	DEMAND	PDAY		
160	Subtotal - Transmission Operation Expenses		41,292						
161	**Transmission Maintenance Expenses**								
162	Maintenance supervision and engineering	861.0	-						
163	Maintenance of structures and improvements	862.0	15		TRANSMISSION	DEMAND	PDAY		
164	Maintenance of mains	863.0	120		TRANSMISSION	DEMAND	PDAY		
165	Maintenance of compressor station equipment	864.0	-		TRANSMISSION	DEMAND	PDAY		
166	Maintenance of measuring and regulating station equipment	865.0	34		TRANSMISSION	DEMAND	PDAY		
167	Maintenance of communication equipment	866.0	-						
168	Maintenance of other equipment	867.0	27		TRANSMISSION	DEMAND	PDAY		
169	Subtotal - Transmission Maintenance Expenses		195						
170	**Distribution Operation Expenses**								
171	Operation supervision and engineering	870.0	6,426	INT_DIST_OL					

National Fuel Gas Distribution Corporation
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Test Year Ending October 31, 2027
SCHEDULE 1 - ACCOUNT BALANCES AND ALLOCATION METHODS
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
172	Distribution load dispatching	871.0	873		DISTRIBUTION	DEMAND	CUST_DEM		
173	Compressor station labor and expenses	872.0	32		DISTRIBUTION	DEMAND	CUST_DEM		
174	Compressor station fuel and power (major only)	873.0	-		DISTRIBUTION	DEMAND	CUST_DEM		
175	Mains and services expenses	874.0	4,421	INT_DMAINS_SERV					
176	Measuring and regulating station expenses—general	875.0	367		DISTRIBUTION	DEMAND	CUST_DEM		
177	Measuring and regulating station expenses—industrial	876.0	118		CUSTOMER	CUSTOMER			M&R
178	Measuring and regulating station expenses—city gate check stations	877.0	9		DISTRIBUTION	DEMAND	CUST_DEM		
179	Meter and house regulator expenses	878.0	1,007		CUSTOMER	CUSTOMER			MTRS
180	Customer installations expenses	879.0	1,132		CUSTOMER	CUSTOMER			CUST
181	Other expenses	880.0	5,408	INT_OM_DIST_SUBTOTAL					
182	Rents	881.0	122	INT_DIST_OL					
183	Subtotal - Distribution Operation Expenses		19,916						
184	**Distribution Maintenance Expenses**								
185	Maintenance supervision and engineering	885.0	837	INT_DIST_ML					
186	Maintenance of structures and improvements	886.0	931		DISTRIBUTION	DEMAND	CUST_DEM		
187	Maintenance of mains	887.0	1,266		DISTRIBUTION	DEMAND	CUST_DEM		
188	Maintenance of compressor station equipment	888.0	0		DISTRIBUTION	DEMAND	CUST_DEM		
189	Maintenance of measuring and regulating station equipment—general	889.0	168		DISTRIBUTION	DEMAND	CUST_DEM		
190	Maintenance of measuring and regulating station equipment—industrial	890.0	109		CUSTOMER	CUSTOMER			M&R
191	Maintenance of measuring and regulating station equipment—city gate	891.0	-		DISTRIBUTION	DEMAND	CUST_DEM		
192	Maintenance of services	892.0	308		DISTRIBUTION	CUSTOMER			SERV
193	Maintenance of meters and house regulators	893.0	484		DISTRIBUTION	CUSTOMER			MTRS
194	Maintenance of other equipment	894.0	88	INT_OM_DIST_SUBTOTAL					
195	Subtotal - Distribution Maintenance Expenses		4,191						
196	**Total Production, Storage, LNG, Transmission, and Distribution Expense**		149,869						

National Fuel Gas Distribution Corporation
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SCHEDULE 1 - ACCOUNT BALANCES AND ALLOCATION METHODS
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
197	**Customer Accounts, Service, and Sales Expense**								
198	**Customer Account**								
199	Supervision	901.0	1,530	INT_CUSTACC					
200	Meter reading expenses	902.0	1,708		CUSTOMER	CUSTOMER			CUST
201	Customer records and collection expenses	903.0	8,813		CUSTOMER	CUSTOMER			CUST
202	Uncollectible accounts	904.0	3,121		CUSTOMER	CUSTOMER			ACT_904
203	Miscellaneous customer accounts expenses	905.0	808	INT_CUSTACC					
204	Subtotal - Customer Account		15,979						
205	**Customer Service & Information Expenses**								
206	Supervision	907.0	130		CUSTOMER	CUSTOMER			CUST
207	Customer assistance expenses	908.0	2,945		CUSTOMER	CUSTOMER			CUST
208	Informational and instructional advertising expenses	909.0	777		CUSTOMER	CUSTOMER			CUST
209	Miscellaneous customer service and informational expenses	910.0	740		CUSTOMER	CUSTOMER			CUST
210	Subtotal - Customer Service & Information Expenses		4,593						
211	**Sales Expenses**								
212	Supervision	911.0	-						
213	Demonstrating and selling expenses	912.0	-						
214	Advertising expenses	913.0	4		CUSTOMER	CUSTOMER			CUST
215	Miscellaneous sales expenses	916.0	-						
216	Subtotal - Sales Expenses		4						
217	**Total Customer Accounts, Service, and Sales Expense**		20,576						
218	**Administrative and General Expenses**								
219	Administrative and general salaries	920.0	14,923	INT_OML					
220	Office supplies and expenses	921.0	3,720	INT_OML					
221	Administrative expenses transferred—Credit	922.0	(1,597)	INT_OML					
222	Outside services employed	923.0	1,101	INT_OML					
223	Property insurance	924.0	113	INT_TOTPLT					
224	Injuries and damages	925.0	2,019	INT_OML					
225	Employee pensions and benefits	926.0	9,248	INT_OML					
226	Franchise requirements	927.0	-						
227	Regulatory commission expenses	928.0	2,104		CUSTOMER	CUSTOMER			REV
228	Duplicate charges—Credit	929.0	-						
229	General advertising expenses	930.1	-						
230	Miscellaneous general expenses	930.2	491	INT_DIST_SUBTOTAL					
231	Rents	931.0	1,338	INT_OML					
232	Maintenance of general plant	932.0	372	INT_DIST_SUBTOTAL					
233	Subtotal - Administrative and General Expenses		33,831						
234	**TOTAL OPERATION AND MAINTENANCE EXPENSE**		204,276						

National Fuel Gas Distribution Corporation
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SCHEDULE 1 - ACCOUNT BALANCES AND ALLOCATION METHODS
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
235	**Adjustments, Depreciation and Amortization Expense**								
236	**Depreciation Expense**								
237	Depreciation expense production	403.0	146	INT_PRODPT					
238	Depreciation expense storage and terminaling	403.1	-						
239	Depreciation expense transmission	403.2	1,904	INT_TRANSPT					
240	Depreciation expense distribution	403.3	14,872	INT_DISTPT					
241	Depreciation expense general plant	403.4	6,134	INT_GENPLT					
242	Depreciation expense common	403.5	350	INT_TOTPLT					
243	Subtotal - Depreciation Expense		23,406						
244	**Amortization Expense**								
245	Amortization and depletion of producing natural gas land and land	404.1	1,896	INT_PRODPT					
246	Amortization of underground storage land and land rights	404.2	-						
247	Amortization of other limited-term gas plant	404.3	-						
248	Amortization of other gas plant	405.0	-						
249	Amortization of gas plant acquisition adjustments	406.0	-						
250	Amortization of property losses, unrecovered plant and regulatory	407.1	-						
251	Amortization of conversion expense	407.2	-						
252	Subtotal - Amortization Expense		1,896						
253	**Adjustments**								
254	Regulatory Debits	407.3	-						
255	Regulatory Credits	407.4	(228)		CUSTOMER	CUSTOMER			REV
256	Gains from disposition of utility plant	411.6	-						
257	Losses from disposition of utility plant	411.7	-						
258	Revenues from natural gas plant leased to others	412.0	-						
259	Expenses of natural gas plant leased to others	413.0	-						
260	Other utility operating income	414.0	-						
261	Subtotal - Adjustments								
262	**Total Adjustments, Depreciation and Amortization Expense**		25,074						
263	**Taxes**								
264	**Taxes Other Than Income Taxes**								
265	Taxes Other Than Income Taxes - Property	408.1	113	INT_TOTPLT					
266	Taxes Other Than Income Taxes - Payroll	408.2	2,400	INT_OML					
267	Taxes Other Than Income Taxes - Excise	408.3	(23)		CUSTOMER	CUSTOMER			REV
268	Subtotal - Taxes Other Than Income Taxes		2,490						
269	**Income Taxes**								
270	Income Taxes - federal taxes utility operating income	409.1	(1,653)	INT_REQ_INCOME					
271	Income Taxes - state taxes utility operating income	409.2	-	INT_REQ_INCOME					
272	Income Taxes - other taxes utility operating income	410.1	-						
273	Provision for deferred income taxes—credit, utility operating income	411.1	(687)	INT_TOTPLT					
274	Investment Tax credit Adj.	411.4	-						
275	Subtotal - Income Taxes		(2,340)						
276	**Total Taxes**		150						

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ending October 31, 2027
SCHEDULE 1 - ACCOUNT BALANCES AND ALLOCATION METHODS
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
277	**REVENUE REQUIREMENT AT EQUAL RATES OF RETURN**								
278	**Test Year Expenses at Current Rates**		229,499						
279	**Return on Rate Base**		50,185	INT_RATEBASE					
280	**Gross Up Items**								
281	Federal Income Tax		3,764	INT_REQ_INCOME					
282	State Utility Tax		1,451	INT_REQ_INCOME					
283	Bad Debts		305		CUSTOMER	CUSTOMER			ACT_904
284	Annual Filing Fee		-						
285	**TOTAL REVENUE REQUIREMENT AT EQUAL RATES OF RETURN**		**285,204**						

286	**INTERNAL ALLOCATION FACTORS**		
287	INT_PRODPT	4,522	2
288	INT_TRANSPT	106,251	1
289	INT_DISTPT	761,953	1
290	INT_GENPLT	58,721	1
291	INT_TOTPLT	957,237	6
292	INT_RATEBASE	571,582	1
293	INT_DMAINS_SERV	675,280	1
294	INT_OML	15,308	24
295	INT_DIST_OL	8,199	2
296	INT_DIST_ML	1,186	1
297	INT_CUSTACC	13,642	2
298	INT_PROD_TRANSM_DIST_SUBTOTAL	872,727	6
299	INT_DIST_SUBTOTAL	748,041	4

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ending October 31, 2027
SCHEDULE 1 - ACCOUNT BALANCES AND ALLOCATION METHODS
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
300	INT_OM_Excl_A&G		45,696	1					
301	INT_OM_DIST_SUBTOTAL		11,226	2					
302	INT_REQ_INCOME		50,185	4					
303	INT_REV_REQ		285,204	0					
304	*last line for internals*								

Line No.	Operating Revenue	FERC Account	Account Balance	Revenue/Margin Allocation Factor
306	Base Rate Revenue	480/481/489	136,735	REV
			-	
			-	
307	Gas Cost Revenues	480/481/489	124,571	GASCOST
308	Forfeited Discounts	487.0	1,125	REV_DSCNT
309	Rent From Gas Property	493.0	100	INT_REV_REQ
310	Other Gas Revenues	495.0	48	INT_REV_REQ
311	Negotiated Contracts	489.0	2,945	INT_REV_REQ
			-	
			-	
			-	
			-	
			-	
			-	
			-	
			-	
312	**Total Operating Revenue**		265,524	
313	**NET INCOME**		36,024	

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ended October 31, 2027
SCHEDULE 2 - EXTERNAL ALLOCATION FACTORS

Allocator Code	Description	Classifier	Total	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
	CUSTOMER EXTERNAL ALLOCATORS											
CUST	**Average Number Customers**	**CUS**	**100%**	**92.1%**	**4.9%**	**2.1%**	**0.7%**	**0.0%**	**0.1%**	**0.2%**	**0.0%**	**0.0%**
			214,901	197,825	10,491	4,453	1,535	7	202	352	26	10
MTRS	**Customer Meters**	**CUS**	**100%**	**70.5%**	**8.5%**	**11.9%**	**6.4%**	**0.1%**	**0.7%**	**1.8%**	**0.2%**	**0.2%**
	Unit Cost (2025)			39	89	293	455	952	374	554	702	1,667
	Relative Weighting Factor			1.00	2.27	7.48	11.62	24.32	9.55	14.17	17.93	42.59
	Unit Cost x Customer		280,752	197,825	23,808	33,296	17,840	170	1,932	4,988	466	426
M&R	**Industrial measuring and regulating station equipment**	**CUS**	**100%**	**0.4%**	**5.0%**	**40.3%**	**16.2%**	**1.1%**	**1.0%**	**17.3%**	**13.3%**	**5.4%**
	Historical Cost		12,566,674	50,010	632,920	5,059,500	2,036,419	136,654	126,281	2,175,330	1,670,405	679,156
SERV	**Services**	**CUS**	**100%**	**92.207%**	**4.289%**	**2.140%**	**0.999%**	**0.001%**	**0.110%**	**0.214%**	**0.019%**	**0.021%**
	Unit Cost (2025)			2,450	2,149	2,526	3,423	815	2,855	3,199	3,902	10,904
	Relative Weighting Factor			1.00	0.88	1.03	1.40	0.33	1.17	1.31	1.59	4.45
	Unit Cost x Customer		214,545	197,825	9,202	4,590	2,144	2	236	460	41	45
ACT_904	Uncollectible accounts - Allocation Factor	CUS	100%	94.9%	2.4%	1.0%	0.4%	0.0%	0.5%	0.8%	0.1%	0.0%
	Uncollectible accounts - Residential		5,054,569	5,054,569								
	Uncollectible accounts - Commercial		200,209		127,406	54,078	18,640	85				
	Uncollectible accounts - Industrial		70,810						24,256	42,236	3,118	1,199
	Uncollectible accounts		5,325,588	5,054,569	127,406	54,078	18,640	85	24,256	42,236	3,118	1,199
	COMMODITY EXTERNAL ALLOCATORS											
REV	Total Sales and Transportation	REV	100%	71.2%	5.0%	5.1%	10.2%	0.1%	0.3%	4.3%	2.0%	1.8%
			136,734,674	97,367,043	6,819,476	6,988,813	13,907,541	131,245	443,729	5,876,219	2,730,253	2,470,353
REV_DSCNT	Other Revenues -Forfeited Discounts	REV	100%	90.0%	2.4%	2.2%	2.2%	0.0%	0.2%	1.3%	0.8%	1.0%
			1,151,259	1,035,802	27,403	25,484	24,922	400	1,758	14,405	9,382	11,703
GASCOST	Gas Purchase Cost	COM	100%	80.9%	4.8%	6.3%	5.3%	0.3%	0.3%	1.7%	0.2%	0.1%
			124,570,582	100,820,125	6,009,785	7,789,941	6,609,463	397,954	363,570	2,174,873	229,318	175,553
COM	Weather Normalized Volumes	COM	100%	49.6%	3.4%	5.8%	16.4%	0.2%	0.3%	8.9%	5.8%	9.7%
			38,211,546	18,958,326	1,294,228	2,201,607	6,255,510	70,034	104,599	3,390,078	2,233,913	3,703,251
SALES_COM	Weather Normalized Volumes for Sales Customers	COM	100%	83.6%	5.0%	6.3%	3.7%	0.3%	0.3%	0.8%	0.0%	0.0%
			20,647,425	17,251,535	1,035,928	1,293,560	770,067	70,034	60,192	166,107	-	-
INCR_WNTR	Incremental Winter Sales Volumes		100%	83.8%	5.1%	6.3%	3.4%	0.4%	0.4%	0.7%		
	Apr-Oct Sales Volumes		6,036,363	5,027,436	299,898	377,436	242,971	19,132	14,004	55,485		
	No. Days Apr-Oct		214	214	214	214	214	214	214	214		
	Apr-Oct Avg Daily Sales		28,207	23,493	1,401	1,764	1,135	89	65	259		
	Nov-Mar Sales Volumes		14,611,062	12,224,099	736,030	916,124	527,096	50,902	46,188	110,622		
	No. Days Nov-Mar		151	151	151	151	151	151	151	151		
	Nov-Mar Avg Daily Sales		96,762	80,954	4,874	6,067	3,491	337	306	733		
	(Incremental NOV-MAR Seasonal Sales)		68,555	57,462	3,473	4,303	2,355	248	240	473		

National Fuel Gas Distribution Corporation
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Test Year Ended October 31, 2027
SCHEDULE 2 - EXTERNAL ALLOCATION FACTORS

Allocator Code	Description	Classifier	Total	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
	DEMAND EXTERNAL ALLOCATORS											
PDAY	Peak Day (Design Day) 62DD	DEM	100%	58.8%	3.7%	6.8%	17.9%	0.4%	0.2%	6.7%	2.3%	3.2%
			400,571	235,420	14,868	27,425	71,665	1,645	966	26,744	9,028	12,810
PEAK_AVRG	Peak and Average	DEM	100%	54.2%	3.5%	6.3%	17.1%	0.3%	0.3%	7.8%	4.0%	6.4%
			1	54.2%	3.5%	6.3%	17.1%	0.3%	0.3%	7.8%	4.0%	6.4%
CUST_DEM	Customer and Demand Composite Factor	DEM	100.0%	79.0%	4.4%	3.9%	7.4%	0.2%	0.2%	2.7%	0.9%	1.3%
	CUST		1.0000	0.9205	0.0488	0.0207	0.0071	0.0000	0.0009	0.0016	0.0001	0.0000
	CUST Customer Component	61%	0.6087	0.5603	0.0297	0.0126	0.0043	0.0000	0.0006	0.0010	0.0001	0.0000
	PDAY		1.0000	0.5877	0.0371	0.0685	0.1789	0.0041	0.0024	0.0668	0.0225	0.0320
	PDAY Demand Components	39%	0.3913	0.2300	0.0145	0.0268	0.0700	0.0016	0.0009	0.0261	0.0088	0.0125

National Fuel Gas Distribution Corporation
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Test Year Ending October 31, 2027
SCHEDULE 3 - INTERNAL ALLOCATION FACTORS

Allocator Code	Total	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
ALLOCATION FACTOR BASIS										
INT_PRODPT	4,522	3,779	227	283	169	15	13	36	-	-
INT_TRANSPT	106,251	62,445	3,944	7,274	19,009	436	256	7,094	2,395	3,398
INT_DISTPT	761,953	617,313	34,305	34,723	42,098	999	1,340	17,163	6,952	7,059
INT_GENPLT	58,721	46,989	2,956	3,103	3,270	70	136	1,257	458	481
INT_TOTPLT	957,237	751,162	42,731	46,746	65,981	1,552	1,806	26,103	10,005	11,150
INT_RATEBASE	571,582	446,527	25,330	27,719	40,971	974	1,072	16,029	6,028	6,930
INT_DMAINS_SERV	675,280	566,315	29,370	22,066	34,423	702	907	12,179	3,869	5,450
INT_OML	15,308	12,250	771	809	852	18	36	328	119	125
INT_DIST_OL	8,199	6,634	415	422	420	9	19	161	59	60
INT_DIST_ML	1,186	929	60	70	72	2	3	29	11	11
INT_CUSTACC	13,642	12,647	588	250	86	0	24	42	3	1
INT_PROD_TRANSM_DIST_SUBTOTAL	872,727	683,537	38,476	42,280	61,276	1,451	1,610	24,294	9,346	10,457
INT_DIST_SUBTOTAL	748,041	606,042	33,679	34,089	41,329	981	1,316	16,850	6,825	6,930
INT_OM_Excl_A&G	45,696	38,952	2,159	1,717	1,653	34	90	641	217	233
INT_OM_DIST_SUBTOTAL	11,226	8,967	560	586	639	14	25	247	91	96
INT_REQ_INCOME	50,185	39,205	2,224	2,434	3,597	85	94	1,407	529	608
INT_REV_REQ	285,204	230,440	13,514	15,268	15,777	608	691	5,743	1,542	1,621
ALLOCATION FACTOR										
INT_PRODPT	100%	84%	5%	6%	4%	0%	0%	1%	0%	0%
INT_TRANSPT	100%	59%	4%	7%	18%	0%	0%	7%	2%	3%
INT_DISTPT	100%	81%	5%	5%	6%	0%	0%	2%	1%	1%
INT_GENPLT	100%	80%	5%	5%	6%	0%	0%	2%	1%	1%
INT_TOTPLT	100%	78%	4%	5%	7%	0%	0%	3%	1%	1%
INT_RATEBASE	100%	78%	4%	5%	7%	0%	0%	3%	1%	1%
INT_DMAINS_SERV	100%	84%	4%	3%	5%	0%	0%	2%	1%	1%
INT_OML	100%	80%	5%	5%	6%	0%	0%	2%	1%	1%
INT_DIST_OL	100%	81%	5%	5%	5%	0%	0%	2%	1%	1%
INT_DIST_ML	100%	78%	5%	6%	6%	0%	0%	2%	1%	1%
INT_CUSTACC	100%	93%	4%	2%	1%	0%	0%	0%	0%	0%
INT_PROD_TRANSM_DIST_SUBTOTAL	100%	78%	4%	5%	7%	0%	0%	3%	1%	1%
INT_DIST_SUBTOTAL	100%	81%	5%	5%	6%	0%	0%	2%	1%	1%
INT_OM_Excl_A&G	100%	85%	5%	4%	4%	0%	0%	1%	0%	1%
INT_OM_DIST_SUBTOTAL	100%	80%	5%	5%	6%	0%	0%	2%	1%	1%
INT_REQ_INCOME	100%	78%	4%	5%	7%	0%	0%	3%	1%	1%
INT_REV_REQ	100%	81%	5%	5%	6%	0%	0%	2%	1%	1%

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
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SCHEDULE 4 - COMPARISON OF COST OF SERVICE WITH REVENUES UNDER PRESENT AND PROPOSED RATES
($ in thousands)

	Pro Forma Cost of Service		Pro Forma Revenues with Cost of Gas and Other Revenues Under Present Rates		Under Proposed Rates		Revenue Increase	
Service Classification	**Amount**	**Percent**	**Amount**	**Percent**	**Amount**	**Percent**	**Amount**	**Percent**
Residential Service	$ 226,915	80.8%	$ 198,187	75.8%	$ 213,591	76.0%	$ 15,404	7.8%
Small Commercial & PA Service (LE 250)	13,340	4.7%	12,829	4.9%	13,712	4.9%	$ 883	6.9%
Small Commercial & PA Service (GT 250)	15,077	5.4%	14,779	5.7%	15,683	5.6%	$ 905	6.1%
Large Comm PA Service	15,581	5.5%	20,517	7.9%	21,859	7.8%	$ 1,342	6.5%
NGV	601	0.2%	529	0.2%	550	0.2%	$ 21	3.9%
SVIS	682	0.2%	807	0.3%	850	0.3%	$ 43	5.3%
IVIS	5,666	2.0%	8,051	3.1%	8,618	3.1%	$ 567	7.0%
LVIS	1,516	0.5%	2,960	1.1%	3,223	1.1%	$ 263	8.9%
LIS	1,592	0.6%	2,646	1.0%	2,884	1.0%	$ 238	9.0%
Total System	**$ 280,970**	100.0%	**$ 261,305**	100.0%	**$ 280,970**	100.0%	**$ 19,665**	7.5%
Other Revenues	4,234		4,219		4,234		$ 15	0.4%
Total	**285,204**		**265,524**		**285,204**		**19,681**	7.4%

	Pro Forma Cost of Service		Pro Forma Margin Revenues Under Present Rates		Under Proposed Rates		Revenue Increase	
Service Classification	**Amount**	**Percent**	**Amount**	**Percent**	**Amount**	**Percent**	**Amount**	**Percent**
Residential Service	$ 126,095	80.6%	$ 97,367	71.2%	$ 112,771	72.1%	$ 15,404	15.8%
Small Commercial & PA Service (LE 250)	7,330	4.7%	6,819	5.0%	$ 7,702	4.9%	$ 883	12.9%
Small Commercial & PA Service (GT 250)	7,287	4.7%	6,989	5.1%	$ 7,893	5.0%	$ 905	12.9%
Large Comm PA Service	8,972	5.7%	13,908	10.2%	$ 15,249	9.8%	$ 1,342	9.6%
NGV	203	0.1%	131	0.1%	$ 152	0.1%	$ 21	15.8%
SVIS	319	0.2%	444	0.3%	$ 487	0.3%	$ 43	9.6%
IVIS	3,491	2.2%	5,876	4.3%	$ 6,443	4.1%	$ 567	9.6%
LVIS	1,286	0.8%	2,730	2.0%	$ 2,994	1.9%	$ 263	9.6%
LIS	1,416	0.9%	2,470	1.8%	$ 2,709	1.7%	$ 238	9.6%
Total System	**$ 156,400**	100.0%	**$ 136,735**	100.0%	**$ 156,400**	100.0%	**$ 19,665**	14.38%
Other Revenues	4,234		4,219		4,234		$ 15	0.4%
Total	**160,634**		**140,953**		**160,634**		**19,681**	14.0%

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ending October 31, 2027
SCHEDULE 5 – COST OF SERVICE AND RATE OF RETURN UNDER PRESENT AND PROPOSED RATES
($ in thousands)

Line No.	Revenue Requirement Summary	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
1	**Rate Base**										
2	Plant in Service	$ 957,237	$ 751,162	$ 42,731	$ 46,746	$ 65,981	$ 1,552	$ 1,806	$ 26,103	$ 10,005	$ 11,150
3	Accumulated Reserve	(320,571)	(253,545)	(14,521)	(16,008)	(20,463)	(488)	(626)	(8,242)	(3,259)	(3,419)
4	Other Rate Base Items	(65,085)	(51,090)	(2,879)	(3,019)	(4,547)	(91)	(108)	(1,832)	(718)	(801)
5	**Total Rate Base**	**$ 571,582**	**$ 446,527**	**$ 25,330**	**$ 27,719**	**$ 40,971**	**$ 974**	**$ 1,072**	**$ 16,029**	**$ 6,028**	**$ 6,930**
6	**Rate of Return Under Current ROR**										
7	**Revenue at Current Rates**										
8	Gas Service Revenue	$ 136,735	$ 97,367	$ 6,819	$ 6,989	$ 13,908	$ 131	$ 444	$ 5,876	$ 2,730	$ 2,470
9	Gas Cost	124,571	100,820	6,010	7,790	6,609	398	364	2,175	229	176
10	Other Revenues	4,219	3,512	173	191	195	7	9	76	26	29
11	**Total Revenue**	**$ 265,524**	**$ 201,699**	**$ 13,003**	**$ 14,969**	**$ 20,712**	**$ 536**	**$ 817**	**$ 8,127**	**$ 2,985**	**$ 2,675**
12	**Expenses at Current Rates**										
13	O&M and A&G Expenses	$ 204,276	$ 166,814	$ 9,875	$ 11,296	$ 10,251	$ 473	$ 534	$ 3,589	$ 737	$ 708
14	Depreciation and Amortization Expense	25,074	19,895	1,156	1,266	1,581	42	51	610	226	249
15	Taxes Other Than Income	2,490	1,992	125	131	139	3	6	53	19	21
16	**Total Operating Expenses**	231,839	188,701	11,155	12,692	11,971	518	591	4,252	982	977
17	**Earnings Before Interest and Taxes**	**33,684**	**12,997**	**1,847**	**2,277**	**8,741**	**19**	**226**	**3,875**	**2,004**	**1,698**
18	Current Federal/State Income Taxes	(1,653)	(638)	(91)	(112)	(429)	(1)	(11)	(190)	(98)	(83)
19	Deferred Income Tax	(687)	(539)	(31)	(34)	(47)	(1)	(1)	(19)	(7)	(8)
20	**Total Income Taxes**	**(2,340)**	**(1,177)**	**(121)**	**(145)**	**(476)**	**(2)**	**(12)**	**(209)**	**(106)**	**(91)**
21	**Total Expenses at Current Rates**	**$ 229,499**	**$ 187,525**	**$ 11,034**	**$ 12,547**	**$ 11,495**	**$ 516**	**$ 578**	**$ 4,043**	**$ 876**	**$ 886**
22	**Operating Income at Current Rates**	**$ 36,024**	**$ 14,174**	**$ 1,969**	**$ 2,422**	**$ 9,218**	**$ 21**	**$ 238**	**$ 4,084**	**$ 2,109**	**$ 1,789**
23	**Current Rate of Return**	**6.30%**	**3.17%**	**7.77%**	**8.74%**	**22.50%**	**2.12%**	**22.24%**	**25.48%**	**34.99%**	**25.82%**
24	**Relative Rate of Return**	**1.00**	**0.50**	**1.23**	**1.39**	**3.57**	**0.34**	**3.53**	**4.04**	**5.55**	**4.10**

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ending October 31, 2027
SCHEDULE 5 – COST OF SERVICE AND RATE OF RETURN UNDER PRESENT AND PROPOSED RATES
($ in thousands)

Line No.	Revenue Requirement Summary	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
25	**Rate of Return Under Proposed ROR**										
26	**Revenue at Proposed ROR**										
27	Gas Service Revenue	$ 156,400	$ 112,771	$ 7,702	$ 7,893	$ 15,249	$ 152	$ 487	$ 6,443	$ 2,994	$ 2,709
28	Gas Cost	$ 124,571	$ 100,820	$ 6,010	$ 7,790	$ 6,609	$ 398	$ 364	$ 2,175	$ 229	$ 176
29	Other Revenues	$ 4,234	$ 3,524	$ 174	$ 191	$ 196	$ 7	$ 9	$ 77	$ 26	$ 29
30	**Total Revenue**	**$ 285,204**	**$ 217,115**	**$ 13,886**	**$ 15,875**	**$ 22,055**	**$ 557**	**$ 859**	**$ 8,695**	**$ 3,249**	**$ 2,913**
31	**Expenses at Required Return**										
32	O&M and A&G Expenses	204,276	166,814	9,875	11,296	10,251	473	534	3,589	737	708
33	Depreciation and Amortization Expense	25,379	20,184	1,163	1,269	1,582	42	52	612	226	249
34	Taxes Other Than Income	2,490	1,992	125	131	139	3	6	53	19	21
35	**Total Operating Expenses**	**232,144**	**188,991**	**11,163**	**12,695**	**11,972**	**518**	**592**	**4,254**	**982**	**977**
36	Current Federal/State Income Taxes	3,562	1,900	183	213	671	3	18	296	151	129
37	Deferred Income Tax	(687)	(539)	(31)	(34)	(47)	(1)	(1)	(19)	(7)	(8)
38	**Income Taxes and Other**	**2,875**	**1,361**	**152**	**179**	**624**	**2**	**17**	**277**	**144**	**121**
39	**Total Expenses at Required Return**	**$ 235,019**	**$ 190,351**	**$ 11,315**	**$ 12,875**	**$ 12,596**	**$ 519**	**$ 608**	**$ 4,531**	**$ 1,125**	**$ 1,098**
40	**Operating Income at Equal ROR**	50,185	26,764	2,572	3,000	9,459	38	251	4,164	2,123	1,815
41	**Current Rate of Return**	**8.78%**	**5.99%**	**10.15%**	**10.82%**	**23.09%**	**3.88%**	**23.41%**	**25.97%**	**35.22%**	**26.19%**
42	**Relative Rate of Return**	**1.00**	**0.68**	**1.16**	**1.23**	**2.63**	**0.44**	**2.67**	**2.96**	**4.01**	**2.98**

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ending October 31, 2027
SCHEDULE 6 - COST OF SERVICE ALLOCATION STUDY FULLY PROJECTED FUTURE TEST YEAR
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
1	**RATE BASE**											
2	**Plant in Service**											
3	**Intangible Plant**											
4	Organization	301	-	-	-	-	-	-	-	-	-	-
5	Franchises & Consents	302	-	-	-	-	-	-	-	-	-	-
6	Misc. Intangible Plant	303	25,789	20,637	1,298	1,363	1,436	31	60	552	201	211
7	Subtotal - Intangible Plant		25,789	20,637	1,298	1,363	1,436	31	60	552	201	211
8	**Natural Gas Production Plant**											
9	Land and Land Rights	325	60	50	3	4	2	0	0	0	-	-
10	Structures and Improvements	328	12	10	1	1	0	0	0	0	-	-
11	Mains	329	3	3	0	0	0	0	0	0	-	-
12	Lines	332	533	445	27	33	20	2	2	4	-	-
13	Measuring and Regulating Equipment	334	3,914	3,271	196	245	146	13	11	31	-	-
14	Subtotal - Natural Gas Production Plant		4,522	3,779	227	283	169	15	13	36	-	-
15	**Transmission plant**											
16	Land and Land Rights	365.1	-	-	-	-	-	-	-	-	-	-
17	Rights-of-Way	365.2	3,363	1,976	125	230	602	14	8	225	76	108
18	Structures and improvements	366	306	180	11	21	55	1	1	20	7	10
19	Mains	367	92,168	54,168	3,421	6,310	16,489	378	222	6,154	2,077	2,948
20	Measuring and regulating station equipment	369	10,415	6,121	387	713	1,863	43	25	695	235	333
21	Subtotal - Transmission plant		106,251	62,445	3,944	7,274	19,009	436	256	7,094	2,395	3,398
22	**Distribution Plant**											
23	Land and land rights	374	17,091	13,507	756	673	1,271	28	26	464	152	214
24	Structures and improvements	375	13,912	11,271	626	634	769	18	24	313	127	129
25	Mains	376	429,663	339,562	19,008	16,930	31,948	699	652	11,654	3,821	5,389
26	Measuring and regulating station equipment—general	378	11,812	9,335	523	465	878	19	18	320	105	148
27	Measuring and regulating station equipment—city gate check st	379	-	-	-	-	-	-	-	-	-	-
28	Services	380	245,617	226,753	10,362	5,135	2,474	3	255	525	47	61
29	Meters	381	18,771	13,227	1,592	2,226	1,193	11	129	334	31	28
30	Meter installations	382	3,769	2,656	320	447	240	2	26	67	6	6
31	House regulators	383	-	-	-	-	-	-	-	-	-	-
32	House regulatory installations	384	1,311	923	111	155	83	1	9	23	2	2
33	Industrial measuring and regulating station equipment	385	20,008	80	1,008	8,056	3,242	218	201	3,463	2,660	1,081
34	Subtotal - Distribution Plant		761,953	617,313	34,305	34,723	42,098	999	1,340	17,163	6,952	7,059
35	**General Plant**											
36	Land and Land Rights	389	-	-	-	-	-	-	-	-	-	-
37	Structures and Improvements	390	1,444	1,155	73	76	80	2	3	31	11	12
38	Office Furniture and Equipment	391	9,989	7,993	503	528	556	12	23	214	78	82
39	Transportation Equipment	392	17,271	13,820	869	913	962	21	40	370	135	142
40	Tools, Shop, and Garage Equipment	394	12,168	9,737	613	643	678	15	28	261	95	100
41	Laboratory Equipment	395	-	-	-	-	-	-	-	-	-	-
42	Power Operated Equipment	396	12,847	10,280	647	679	715	15	30	275	100	105
43	Communication Equipment	397	5,002	4,003	252	264	279	6	12	107	39	41
44	Misc. Equipment	398	-	-	-	-	-	-	-	-	-	-
45	Other Intangible Property	399	-	-	-	-	-	-	-	-	-	-
46	Subtotal - General Plant		58,721	46,989	2,956	3,103	3,270	70	136	1,257	458	481
47	**Total Plant in Service**		957,237	751,162	42,731	46,746	65,981	1,552	1,806	26,103	10,005	11,150

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ending October 31, 2027
SCHEDULE 6 - COST OF SERVICE ALLOCATION STUDY FULLY PROJECTED FUTURE TEST YEAR
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
48	**Accumulated Depreciation & Amortization Expense**											
49	**Intangible Plant**											
50	Organization	301	-	-	-	-	-	-	-	-	-	-
51	Franchises & Consents	302	-	-	-	-	-	-	-	-	-	-
52	Misc. Intangible Plant	303	(22,959)	(18,372)	(1,156)	(1,213)	(1,278)	(28)	(53)	(492)	(179)	(188)
53	Subtotal - Intangible Plant		(22,959)	(18,372)	(1,156)	(1,213)	(1,278)	(28)	(53)	(492)	(179)	(188)
54	**Natural Gas Production Plant**											
55	Land and Land Rights	325	(35)	(29)	(2)	(2)	(1)	(0)	(0)	(0)	-	-
56	Structures and Improvements	328	(10)	(8)	(0)	(1)	(0)	(0)	(0)	(0)	-	-
57	Mains	329	(1)	(1)	(0)	(0)	(0)	(0)	(0)	(0)	-	-
58	Lines	332	(175)	(146)	(9)	(11)	(7)	(1)	(1)	(1)	-	-
59	Measuring and Regulating Equipment	334	(1,777)	(1,484)	(89)	(111)	(66)	(6)	(5)	(14)	-	-
60	Subtotal - Natural Gas Production Plant		(1,998)	(1,669)	(100)	(125)	(75)	(7)	(6)	(16)	-	-
61	**Transmission plant**											
62	Land and Land Rights	365.1	-	-	-	-	-	-	-	-	-	-
63	Rights-of-Way	365.2	(699)	(411)	(26)	(48)	(125)	(3)	(2)	(47)	(16)	(22)
64	Structures and improvements	366	(125)	(73)	(5)	(9)	(22)	(1)	(0)	(8)	(3)	(4)
65	Mains	367	(23,289)	(13,687)	(864)	(1,594)	(4,167)	(96)	(56)	(1,555)	(525)	(745)
66	Measuring and regulating station equipment	369	(4,442)	(2,611)	(165)	(304)	(795)	(18)	(11)	(297)	(100)	(142)
67	Subtotal - Transmission plant		(28,555)	(16,782)	(1,060)	(1,955)	(5,109)	(117)	(69)	(1,906)	(644)	(913)
68	**Distribution Plant**											
69	Land and land rights	374	(3,405)	(2,691)	(151)	(134)	(253)	(6)	(5)	(92)	(30)	(43)
70	Structures and improvements	375	(6,914)	(5,602)	(311)	(315)	(382)	(9)	(12)	(156)	(63)	(64)
71	Mains	376	(121,367)	(95,916)	(5,369)	(4,782)	(9,024)	(197)	(184)	(3,292)	(1,079)	(1,522)
72	Measuring and regulating station equipment—general	378	(4,610)	(3,644)	(204)	(182)	(343)	(8)	(7)	(125)	(41)	(58)
73	Measuring and regulating station equipment—city gate check st	379	-	-	-	-	-	-	-	-	-	-
74	Services	380	(91,472)	(84,446)	(3,859)	(1,912)	(921)	(1)	(95)	(195)	(18)	(23)
75	Meters	381	(7,080)	(4,989)	(600)	(840)	(450)	(4)	(49)	(126)	(12)	(11)
76	Meter installations	382	(1,965)	(1,385)	(167)	(233)	(125)	(1)	(14)	(35)	(3)	(3)
77	House regulators	383	-	-	-	-	-	-	-	-	-	-
78	House regulatory installations	384	(620)	(437)	(53)	(74)	(39)	(0)	(4)	(11)	(1)	(1)
79	Industrial measuring and regulating station equipment	385	(7,654)	(30)	(386)	(3,082)	(1,240)	(83)	(77)	(1,325)	(1,017)	(414)
80	Subtotal - Distribution Plant		(245,087)	(199,139)	(11,099)	(11,554)	(12,778)	(310)	(447)	(5,357)	(2,265)	(2,138)
81	**General Plant**											
82	Land and Land Rights	389	-	-	-	-	-	-	-	-	-	-
83	Structures and Improvements	390	(157)	(125)	(8)	(8)	(9)	(0)	(0)	(3)	(1)	(1)
84	Office Furniture and Equipment	391	(5,423)	(4,339)	(273)	(287)	(302)	(7)	(13)	(116)	(42)	(44)
85	Transportation Equipment	392	(8,518)	(6,816)	(429)	(450)	(474)	(10)	(20)	(182)	(66)	(70)
86	Tools, Shop, and Garage Equipment	394	(2,723)	(2,179)	(137)	(144)	(152)	(3)	(6)	(58)	(21)	(22)
87	Laboratory Equipment	395	-	-	-	-	-	-	-	-	-	-
88	Power Operated Equipment	396	(3,401)	(2,721)	(171)	(180)	(189)	(4)	(8)	(73)	(27)	(28)
89	Communication Equipment	397	(1,751)	(1,401)	(88)	(93)	(97)	(2)	(4)	(37)	(14)	(14)
90	Misc. Equipment	398	-	-	-	-	-	-	-	-	-	-
91	Other Intangible Property	399	-	-	-	-	-	-	-	-	-	-
92	Subtotal - General Plant		(21,972)	(17,582)	(1,106)	(1,161)	(1,223)	(26)	(51)	(470)	(171)	(180)
93	**Total Accumulated Depreciation & Amortization Expense**		(320,571)	(253,545)	(14,521)	(16,008)	(20,463)	(488)	(626)	(8,242)	(3,259)	(3,419)

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ending October 31, 2027
SCHEDULE 6 - COST OF SERVICE ALLOCATION STUDY FULLY PROJECTED FUTURE TEST YEAR
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
94	**Other Rate Base Items**											
95	Materials And Supplies	154	1,587	1,243	70	77	111	3	3	44	17	19
96	Stores Expense Undistributed	163	-	-	-	-	-	-	-	-	-	-
97	Gas Stored Underground - PA	164.1	5,664	4,747	287	356	195	20	20	39	-	-
98	Gas owed to system gas	117.4	-	-	-	-	-	-	-	-	-	-
99	Prepayments	165	1,080	848	48	53	74	2	2	29	11	13
100	Customer deposits	235	(5,166)	(4,756)	(252)	(107)	(37)	(0)	(5)	(8)	(1)	(0)
101	Accumulated deferred income taxes—other property	282	(73,925)	(58,010)	(3,300)	(3,610)	(5,096)	(120)	(139)	(2,016)	(773)	(861)
102	Working capital allowance	N/A	5,675	4,837	268	213	205	4	11	80	27	29
103	Subtotal - Other Rate Base Items		(65,085)	(51,090)	(2,879)	(3,019)	(4,547)	(91)	(108)	(1,832)	(718)	(801)
104	**TOTAL RATE BASE**		571,582	446,527	25,330	27,719	40,971	974	1,072	16,029	6,028	6,930
105	**OPERATION AND MAINTENANCE EXPENSE**											
106	**Production, Storage, LNG, Transmission, and Distribution Expense**											
107	**Manufactured Gas Production Expense**											
108	Operation Supv & Engineering	750	0.01	0	0	0	0	0	0	0	-	-
109	Field Line Expenses	753	19.97	17	1	1	1	0	0	0	-	-
110	Field Compressor St Expenses	754	3.04	3	0	0	0	0	0	0	-	-
111	Measuring & Regulator Expenses	756	0.40	0	0	0	0	0	0	0	-	-
112	Purification Expenses	757	0.79	1	0	0	0	0	0	0	-	-
113	Other Expenses	759	(0.02)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	-	-
114	Maint Structures & Improvement	762	-	-	-	-	-	-	-	-	-	-
115	Maint Field Lines	764	-	-	-	-	-	-	-	-	-	-
116	Maint Field Meas & Reg Sta Eq	766	(0.28)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	-	-
117	Maint Purification Equipment	767	0.01	0	0	0	0	0	0	0	-	-
118	Maint Other Equipment	769	4.60	4	0	0	0	0	0	0	-	-
119	Subtotal - Manufactured Gas Production Expense		29	24	1	2	1	0	0	0	-	-

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SCHEDULE 6 - COST OF SERVICE ALLOCATION STUDY FULLY PROJECTED FUTURE TEST YEAR
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
120	**Other Gas Supply Expenses**											
121	Natural gas field line purchases	801	65,714	53,185	3,170	4,109	3,487	210	192	1,147	121	93
122	Natural gas city gate purchases	804	54	43	3	3	3	0	0	1	0	0
123	Exchange gas	806	573	464	28	36	30	2	2	10	1	1
124	Well expenses—Purchased gas	807.1	189	158	9	12	7	1	1	2	-	-
125	Operation of purchased gas measuring stations.	807.2	-	-	-	-	-	-	-	-	-	-
126	Maintenance of purchased gas measuring stations.	807.3	-	-	-	-	-	-	-	-	-	-
127	Purchased gas calculations expenses.	807.4	-	-	-	-	-	-	-	-	-	-
128	Other purchased gas expenses.	807.5	-	-	-	-	-	-	-	-	-	-
129	Gas withdrawn from storage—debit	808.1	42,369	34,291	2,044	2,649	2,248	135	124	740	78	60
130	Gas delivered to storage—credit	808.2	(41,357)	(33,472)	(1,995)	(2,586)	(2,194)	(132)	(121)	(722)	(76)	(58)
131	Gas used for other utility operations—credit	812	(39)	(33)	(2)	(2)	(1)	(0)	(0)	(0)	-	-
132	Subtotal - Other Gas Supply Expenses		67,501	54,635	3,257	4,221	3,579	216	197	1,177	124	95
133	**Underground Storage Expenses - Operation**											
134	Operation supervision and engineering	814	-	-	-	-	-	-	-	-	-	-
135	Maps and records	815	-	-	-	-	-	-	-	-	-	-
136	Wells expenses	816	-	-	-	-	-	-	-	-	-	-
137	Lines expenses	817	-	-	-	-	-	-	-	-	-	-
138	Compressor station expenses	818	-	-	-	-	-	-	-	-	-	-
139	Compressor station fuel and power	819	-	-	-	-	-	-	-	-	-	-
140	Measuring and regulating station expenses	820	-	-	-	-	-	-	-	-	-	-
141	Purification expenses	821	-	-	-	-	-	-	-	-	-	-
142	Exploration and development	822	-	-	-	-	-	-	-	-	-	-
143	Gas losses	823	-	-	-	-	-	-	-	-	-	-
144	Other expenses	824	-	-	-	-	-	-	-	-	-	-
145	Storage well royalties	825	-	-	-	-	-	-	-	-	-	-
146	Rents	826	16,746	13,553	808	1,047	888	53	49	292	31	24
147	Subtotal - Underground Storage Expenses - Operation		16,746	13,553	808	1,047	888	53	49	292	31	24
148	**Transmission Operation Expenses**											
149	Operation supervision and engineering	850	2	1	0	0	0	0	0	0	0	0
150	System control and load dispatching	851	33	20	1	2	6	0	0	2	1	1
151	Communication system expenses	852	-	-	-	-	-	-	-	-	-	-
152	Compressor station labor and expenses	853	5	3	0	0	1	0	0	0	0	0
153	Gas for compressor station fuel	854	-	-	-	-	-	-	-	-	-	-
154	Other fuel and power for compressor stations	855	-	-	-	-	-	-	-	-	-	-
155	Mains expenses	856	662	389	25	45	118	3	2	44	15	21
156	Measuring and regulating station expenses	857	70	41	3	5	12	0	0	5	2	2
157	Transmission and compression of gas by others	858	40,474	32,757	1,953	2,531	2,147	129	118	707	75	57
158	Other expenses	859	46	27	2	3	8	0	0	3	1	1
159	Rents	860	-	-	-	-	-	-	-	-	-	-
160	Subtotal - Transmission Operation Expenses		41,292	33,238	1,983	2,587	2,294	133	120	761	93	83
161	**Transmission Maintenance Expenses**											
162	Maintenance supervision and engineering	861	-	-	-	-	-	-	-	-	-	-
163	Maintenance of structures and improvements	862	15	9	1	1	3	0	0	1	0	0
164	Maintenance of mains	863	120	70	4	8	21	0	0	8	3	4
165	Maintenance of compressor station equipment	864	-	-	-	-	-	-	-	-	-	-
166	Maintenance of measuring and regulating station equipment	865	34	20	1	2	6	0	0	2	1	1
167	Maintenance of communication equipment	866	-	-	-	-	-	-	-	-	-	-
168	Maintenance of other equipment	867	27	16	1	2	5	0	0	2	1	1
169	Subtotal - Transmission Maintenance Expenses		195	115	7	13	35	1	0	13	4	6

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Line No.	Account Description	FERC Account	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
170	**Distribution Operation Expenses**											
171	Operation supervision and engineering	870	6,426	5,200	326	331	329	7	15	126	46	47
172	Distribution load dispatching	871	873	690	39	34	65	1	1	24	8	11
173	Compressor station labor and expenses	872	32	26	1	1	2	0	0	1	0	0
174	Compressor station fuel and power (major only)	873	-	-	-	-	-	-	-	-	-	-
175	Mains and services expenses	874	4,421	3,708	192	144	225	5	6	80	25	36
176	Measuring and regulating station expenses—general	875	367	290	16	14	27	1	1	10	3	5
177	Measuring and regulating station expenses—industrial	876	118	0	6	48	19	1	1	20	16	6
178	Measuring and regulating station expenses—city gate check stat	877	9	7	0	0	1	0	0	0	0	0
179	Meter and house regulator expenses	878	1,007	710	85	119	64	1	7	18	2	2
180	Customer installations expenses	879	1,132	1,042	55	23	8	0	1	2	0	0
181	Other expenses	880	5,408	4,320	270	283	308	7	12	119	44	46
182	Rents	881	122	99	6	6	6	0	0	2	1	1
183	Subtotal - Distribution Operation Expenses		19,916	16,091	997	1,005	1,055	22	44	402	145	154
184	**Distribution Maintenance Expenses**											
185	Maintenance supervision and engineering	885	837	655	43	49	51	1	2	20	8	8
186	Maintenance of structures and improvements	886	931	736	41	37	69	2	1	25	8	12
187	Maintenance of mains	887	1,266	1,000	56	50	94	2	2	34	11	16
188	Maintenance of compressor station equipment	888	0	0	0	0	0	0	0	0	0	0
189	Maintenance of measuring and regulating station equipment—g	889	168	133	7	7	13	0	0	5	1	2
190	Maintenance of measuring and regulating station equipment—i	890	109	0	6	44	18	1	1	19	15	6
191	Maintenance of measuring and regulating station equipment—c	891	-	-	-	-	-	-	-	-	-	-
192	Maintenance of services	892	308	285	13	6	3	0	0	1	0	0
193	Maintenance of meters and house regulators	893	484	341	41	57	31	0	3	9	1	1
194	Maintenance of other equipment	894	88	70	4	5	5	0	0	2	1	1
195	Subtotal - Distribution Maintenance Expenses		4,191	3,220	211	255	283	7	11	114	45	45
196	**Total Production, Storage, LNG, Transmission, and Distribution Ex**		149,869	120,876	7,265	9,130	8,136	432	421	2,761	442	407

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Line No.	Account Description	FERC Account	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
197	**Customer Accounts, Service, and Sales Expense**											
198	**Customer Account**											
199	Supervision	901	1,530	1,418	66	28	10	0	3	5	0	0
200	Meter reading expenses	902	1,708	1,572	83	35	12	0	2	3	0	0
201	Customer records and collection expenses	903	8,813	8,112	430	183	63	0	8	14	1	0
202	Uncollectible accounts	904	3,121	2,962	75	32	11	0	14	25	2	1
203	Miscellaneous customer accounts expenses	905	808	749	35	15	5	0	1	2	0	0
204	Subtotal - Customer Account		15,979	14,814	689	292	101	0	28	49	4	1
205	**Customer Service & Information Expenses**											
206	Supervision	907	130	119	6	3	1	0	0	0	0	0
207	Customer assistance expenses	908	2,945	2,711	144	61	21	0	3	5	0	0
208	Informational and instructional advertising expenses	909	777	716	38	16	6	0	1	1	0	0
209	Miscellaneous customer service and informational expenses	910	740	681	36	15	5	0	1	1	0	0
210	Subtotal - Customer Service & Information Expenses		4,593	4,228	224	95	33	0	4	8	1	0
211	**Sales Expenses**											
212	Supervision	911	-	-	-	-	-	-	-	-	-	-
213	Demonstrating and selling expenses	912	-	-	-	-	-	-	-	-	-	-
214	Advertising expenses	913	4	3	0	0	0	0	0	0	0	0
215	Miscellaneous sales expenses	916	-	-	-	-	-	-	-	-	-	-
216	Subtotal - Sales Expenses		4	3	0	0	0	0	0	0	0	0
217	**Total Customer Accounts, Service, and Sales Expense**		20,576	19,045	913	388	134	1	33	57	4	2
218	**Administrative and General Expenses**											
219	Administrative and general salaries	920	14,923	11,941	751	789	831	18	35	320	116	122
220	Office supplies and expenses	921	3,720	2,977	187	197	207	4	9	80	29	30
221	Administrative expenses transferred—Credit	922	(1,597)	(1,278)	(80)	(84)	(89)	(2)	(4)	(34)	(12)	(13)
222	Outside services employed	923	1,101	881	55	58	61	1	3	24	9	9
223	Property insurance	924	113	89	5	6	8	0	0	3	1	1
224	Injuries and damages	925	2,019	1,615	102	107	112	2	5	43	16	17
225	Employee pensions and benefits	926	9,248	7,400	466	489	515	11	21	198	72	76
226	Franchise requirements	927	-	-	-	-	-	-	-	-	-	-
227	Regulatory commission expenses	928	2,104	1,498	105	108	214	2	7	90	42	38
228	Duplicate charges—Credit	929	-	-	-	-	-	-	-	-	-	-
229	General advertising expenses	930.1	-	-	-	-	-	-	-	-	-	-
230	Miscellaneous general expenses	930.2	491	398	22	22	27	1	1	11	4	5
231	Rents	931	1,338	1,071	67	71	75	2	3	29	10	11
232	Maintenance of general plant	932	372	301	17	17	21	0	1	8	3	3
233	Subtotal - Administrative and General Expenses		33,831	26,893	1,697	1,777	1,982	40	80	771	291	299
234	**TOTAL OPERATION AND MAINTENANCE EXPENSE**		204,276	166,814	9,875	11,296	10,251	473	534	3,589	737	708

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Line No.	Account Description	FERC Account	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
235	**Adjustments, Depreciation and Amortization Expense**											
236	**Depreciation Expense**											
237	Depreciation expense production	403	146	122	7	9	5	0	0	1	-	-
238	Depreciation expense storage and terminaling	403.1	-	-	-	-	-	-	-	-	-	-
239	Depreciation expense transmission	403.2	1,904	1,119	71	130	341	8	5	127	43	61
240	Depreciation expense distribution	403.3	14,872	12,049	670	678	822	20	26	335	136	138
241	Depreciation expense general plant	403.4	6,134	4,908	309	324	342	7	14	131	48	50
242	Depreciation expense common	403.5	350	275	16	17	24	1	1	10	4	4
243	Subtotal - Depreciation Expense		23,406	18,473	1,072	1,158	1,533	36	46	604	230	253
244	**Amortization Expense**											
245	Amortization and depletion of producing natural gas land and la	404.1	1,896	1,584	95	119	71	6	6	15	-	-
246	Amortization of underground storage land and land rights	404.2	-	-	-	-	-	-	-	-	-	-
247	Amortization of other limited-term gas plant	404.3	-	-	-	-	-	-	-	-	-	-
248	Amortization of other gas plant	405	-	-	-	-	-	-	-	-	-	-
249	Amortization of gas plant acquisition adjustments	406	-	-	-	-	-	-	-	-	-	-
250	Amortization of property losses, unrecovered plant and regulato	407.1	-	-	-	-	-	-	-	-	-	-
251	Amortization of conversion expense	407.2	-	-	-	-	-	-	-	-	-	-
252	Subtotal - Amortization Expense		1,896	1,584	95	119	71	6	6	15	-	-
				-	-	-	-	-	-	-	-	-
253	Adjustments			-	-	-	-	-	-	-	-	-
254	Regulatory Debits	407.3	-	-	-	-	-	-	-	-	-	-
255	Regulatory Credits	407.4	(228)	(162)	(11)	(12)	(23)	(0)	(1)	(10)	(5)	(4)
256	Gains from disposition of utility plant	411.6	-	-	-	-	-	-	-	-	-	-
257	Losses from disposition of utility plant	411.7	-	-	-	-	-	-	-	-	-	-
258	Revenues from natural gas plant leased to others	412	-	-	-	-	-	-	-	-	-	-
259	Expenses of natural gas plant leased to others	413	-	-	-	-	-	-	-	-	-	-
260	Other utility operating income	414	-	-	-	-	-	-	-	-	-	-
261	Subtotal - Adjustments			(162)	(11)	(12)	(23)	(0)	(1)	(10)	(5)	(4)
				-	-	-	-	-	-	-	-	-
262	**Total Adjustments, Depreciation and Amortization Expense**		25,074	19,895	1,156	1,266	1,581	42	51	610	226	249
263	**Taxes**											
264	**Taxes Other Than Income Taxes**											
265	Taxes Other Than Income Taxes - Property	408.1	113	88	5	5	8	0	0	3	1	1
266	Taxes Other Than Income Taxes - Payroll	408.2	2,400	1,920	121	127	134	3	6	51	19	20
267	Taxes Other Than Income Taxes - Excise	408.3	(23)	(16)	(1)	(1)	(2)	(0)	(0)	(1)	(0)	(0)
268	Subtotal - Taxes Other Than Income Taxes		2,490	1,992	125	131	139	3	6	53	19	21
269	**Income Taxes**											
270	Income Taxes - federal taxes utility operating income	409.1	(1,653)	(1,291)	(73)	(80)	(118)	(3)	(3)	(46)	(17)	(20)
271	Income Taxes - state taxes utility operating income	409.2	-	-	-	-	-	-	-	-	-	-
272	Income Taxes - other taxes utility operating income	410.1	-	-	-	-	-	-	-	-	-	-
273	Provision for deferred income taxes—credit, utility operating inc	411.1	(687)	(539)	(31)	(34)	(47)	(1)	(1)	(19)	(7)	(8)
274	Investment Tax credit Adj.	411.4	-	-	-	-	-	-	-	-	-	-
275	Subtotal - Income Taxes		(2,340)	(1,830)	(104)	(114)	(166)	(4)	(4)	(65)	(25)	(28)
276	**Total Taxes**		150	162	21	17	(27)	(1)	1	(12)	(5)	(7)

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($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
277	**REVENUE REQUIREMENT AT EQUAL RATES OF RETURN**											
278	**Test Year Expenses at Current Rates**		229,499	186,871	11,051	12,579	11,805	514	586	4,187	957	949
279	**Return on Rate Base**		50,185	39,205	2,224	2,434	3,597	85	94	1,407	529	608
280	**Gross Up Items**			-	-	-	-	-	-	-	-	-
281	Federal Income Tax		3,764	2,940	167	183	270	6	7	106	40	46
282	State Utility Tax		1,451	1,134	64	70	104	2	3	41	15	18
283	Bad Debts		305	289	7	3	1	0	1	2	0	0
284	Annual Filing Fee		-	-	-	-	-	-	-	-	-	-
285	**TOTAL REVENUE REQUIREMENT AT EQUAL RATES OF RETURN**		**285,204**	**230,440**	**13,514**	**15,268**	**15,777**	**608**	**691**	**5,743**	**1,542**	**1,621**

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SCHEDULE 7 - FUNCTIONALIZED AND CLASSIFIED RATE BASE AND REVENUE REQUIREMENT, AND UNIT COSTS BY CUSTOMER CLASS
($ in thousands)

Line	Description		TOTAL	Total Check	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
1	**Functional Rate Base**												
2	**Production**												
3	Demand	Product_Dem	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
4	Commodity	Product_Comm	$ 7,865	-	$ 6,586	$ 397	$ 493	$ 277	$ 28	$ 26	$ 57	$ -	$ -
5	Customer	Product_Cust	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
6	Subtotal		$ 7,865	-	$ 6,586	$ 397	$ 493	$ 277	$ 28	$ 26	$ 57	$ -	$ -
			$ -	-									
7	**Transmission**		0	-									
8	Demand	Transm_Dem	$ 70,794	-	$ 41,607	$ 2,628	$ 4,847	$ 12,666	$ 291	$ 171	$ 4,727	$ 1,596	$ 2,264
9	Commodity	Transm_Comm	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
10	Customer	Transm_Cust	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
11	Subtotal		$ 70,794	-	$ 41,607	$ 2,628	$ 4,847	$ 12,666	$ 291	$ 171	$ 4,727	$ 1,596	$ 2,264
			0	-									
12	**Distribution**		0	-									
13	Demand	Distrib_Dem	$ 316,299	-	$ 249,970	$ 13,993	$ 12,463	$ 23,519	$ 515	$ 480	$ 8,579	$ 2,813	$ 3,967
14	Commodity	Distrib_Comm	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
15	Customer	Distrib_Cust	$ (2,541)	-	$ (2,622)	$ (85)	$ 78	$ 61	$ 1	$ 6	$ 18	$ 2	$ 2
16	Subtotal		$ 313,758	-	$ 247,348	$ 13,908	$ 12,541	$ 23,579	$ 515	$ 485	$ 8,597	$ 2,815	$ 3,969
			0	-									
17	**Customer**		0	-									
18	Demand	Cust_Dem	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
19	Commodity	Cust_Comm	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
20	Customer	Cust_Cust	$ 179,164	-	$ 150,986	$ 8,397	$ 9,838	$ 4,450	$ 140	$ 389	$ 2,649	$ 1,618	$ 696
21	Subtotal		$ 179,164	-	$ 150,986	$ 8,397	$ 9,838	$ 4,450	$ 140	$ 389	$ 2,649	$ 1,618	$ 696
			0	-									
22	**Gas Supply**		0	-									
23	Demand	Gas Supply_Den	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
24	Commodity	Gas Supply_Con	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
25	Customer	Gas Supply_Cus	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
26	Subtotal		$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
			0	-									
27	**Total**		0	-									
28	Demand		$ 387,093	-	$ 291,577	$ 16,620	$ 17,310	$ 36,184	$ 805	$ 650	$ 13,306	$ 4,408	$ 6,231
29	Commodity		$ 7,865	-	$ 6,586	$ 397	$ 493	$ 277	$ 28	$ 26	$ 57	$ -	$ -
30	Customer		$ 176,623	-	$ 148,364	$ 8,313	$ 9,916	$ 4,510	$ 140	$ 395	$ 2,667	$ 1,620	$ 698
31	**TOTAL RATE BASE**		$ 571,582	-	$ 446,527	$ 25,330	$ 27,719	$ 40,971	$ 974	$ 1,072	$ 16,029	$ 6,028	$ 6,930

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SCHEDULE 7 - FUNCTIONALIZED AND CLASSIFIED RATE BASE AND REVENUE REQUIREMENT, AND UNIT COSTS BY CUSTOMER CLASS
($ in thousands)

Line	Description		TOTAL	Total Check	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
			0	-									
32	**Functional Revenue Requirement**		0	-									
			0	-									
33	**Production**		0	-									
34	Demand	Product_Dem	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
35	Commodity	Product_Comm	$ 2,974	-	$ 2,486	$ 149	$ 186	$ 109	$ 10	$ 9	$ 23	$ -	$ -
36	Customer	Product_Cust	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
37	Subtotal		$ 2,974	-	$ 2,486	$ 149	$ 186	$ 109	$ 10	$ 9	$ 23	$ -	$ -
			0	-									
38	**Transmission**		0	-									
39	Demand	Transm_Dem	$ 10,587	-	$ 6,222	$ 393	$ 725	$ 1,894	$ 43	$ 26	$ 707	$ 239	$ 339
40	Commodity	Transm_Comm	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
41	Customer	Transm_Cust	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
42	Subtotal		$ 10,587	-	$ 6,222	$ 393	$ 725	$ 1,894	$ 43	$ 26	$ 707	$ 239	$ 339
			0	-									
43	**Distribution**		0	-									
44	Demand	Distrib_Dem	$ 71,390	-	$ 56,419	$ 3,158	$ 2,813	$ 5,308	$ 116	$ 108	$ 1,936	$ 635	$ 895
45	Commodity	Distrib_Comm	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
46	Customer	Distrib_Cust	$ 4,320	-	$ 3,435	$ 287	$ 338	$ 181	$ 2	$ 19	$ 49	$ 5	$ 4
47	Subtotal		$ 75,710	-	$ 59,854	$ 3,445	$ 3,151	$ 5,489	$ 118	$ 128	$ 1,985	$ 639	$ 900
			0	-									
48	**Customer**		0	-									
49	Demand	Cust_Dem	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
50	Commodity	Cust_Comm	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
51	Customer	Cust_Cust	$ 71,363	-	$ 61,057	$ 3,516	$ 3,416	$ 1,676	$ 39	$ 166	$ 852	$ 434	$ 207
52	Subtotal		$ 71,363	-	$ 61,057	$ 3,516	$ 3,416	$ 1,676	$ 39	$ 166	$ 852	$ 434	$ 207
			0	-									
53	**Gas Supply**		0	-									
54	Demand	Gas Supply_Den	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
55	Commodity	Gas Supply_Con	$ 124,571	-	$ 100,820	$ 6,010	$ 7,790	$ 6,609	$ 398	$ 364	$ 2,175	$ 229	$ 176
56	Customer	Gas Supply_Cus	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
57	Subtotal		$ 124,571	-	$ 100,820	$ 6,010	$ 7,790	$ 6,609	$ 398	$ 364	$ 2,175	$ 229	$ 176
			0	-									
58	**Total**		0	-									
59	Demand		$ 81,977	-	$ 62,641	$ 3,551	$ 3,538	$ 7,202	$ 160	$ 134	$ 2,643	$ 873	$ 1,234
60	Commodity		$ 127,544	-	$ 103,306	$ 6,159	$ 7,976	$ 6,719	$ 408	$ 373	$ 2,198	$ 229	$ 176
61	Customer		$ 75,683	-	$ 64,492	$ 3,803	$ 3,754	$ 1,856	$ 40	$ 185	$ 902	$ 439	$ 211
	TOTAL REVENUE REQUIREMENT AT EQUAL		$ 285,204		$ 230,440	$ 13,514	$ 15,268	$ 15,777	$ 608	$ 691	$ 5,743	$ 1,542	$ 1,621
62	**RATES OF RETURN**			-									
63	Demand		28.74%		27.18%	26.28%	23.17%	45.65%	26.25%	19.35%	46.02%	56.66%	76.13%
64	Energy		44.72%		44.83%	45.58%	52.24%	42.59%	67.13%	53.88%	38.28%	14.87%	10.83%
65	Customer		26.54%		27.99%	28.14%	24.59%	11.77%	6.62%	26.77%	15.70%	28.47%	13.04%

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ending October 31, 2027
SCHEDULE 7 - FUNCTIONALIZED AND CLASSIFIED RATE BASE AND REVENUE REQUIREMENT, AND UNIT COSTS BY CUSTOMER CLASS
($ in thousands)

Line	Description		TOTAL	Total Check	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
66	**Unit Costs (in $)**												
67	**Production**												
68	Demand	Product_Dem	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
69	Commodity	Product_Comm	$ 0.08		$ 0.13	$ 0.12	$ 0.08	$ 0.02	$ 0.15	$ 0.09	$ 0.01	$ -	$ -
70	Customer	Product_Cust	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
71	**Transmission**												
72	Demand	Transm_Dem	$ 2.20		$ 2.20	$ 2.20	$ 2.20	$ 2.20	$ 2.20	$ 2.20	$ 2.20	$ 2.20	$ 2.20
73	Commodity	Transm_Comm	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
74	Customer	Transm_Cust	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
75	**Distribution**												
76	Demand	Distrib_Dem	$ 14.85		$ 19.97	$ 17.70	$ 8.55	$ 6.17	$ 5.88	$ 9.34	$ 6.03	$ 5.86	$ 5.82
77	Commodity	Distrib_Comm	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
78	Customer	Distrib_Cust	$ 1.68		$ 1.45	$ 2.28	$ 6.33	$ 9.81	$ 18.46	$ 7.98	$ 11.63	$ 14.72	$ 36.60
79	**Customer**												
80	Demand	Cust_Dem	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
81	Commodity	Cust_Comm	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
82	Customer	Cust_Cust	$ 27.67		$ 25.72	$ 27.93	$ 63.93	$ 90.97	$ 460.99	$ 68.27	$ 201.72	$ 1,391.82	$ 1,724.79
83	**Gas Supply**												
84	Demand	Gas Supply_Den	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
85	Commodity	Gas Supply_Con	$ 3.26		$ 5.32	$ 4.64	$ 3.54	$ 1.06	$ 5.68	$ 3.48	$ 0.64	$ 0.10	$ 0.05
86	Customer	Gas Supply_Cust	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
87	**Total**												
88	Commodity		$ 3.34		$ 5.45	$ 4.76	$ 3.62	$ 1.07	$ 5.83	$ 3.56	$ 0.65	$ 0.10	$ 0.05
89	Customer (per cust month)		$ 29.35		$ 27.17	$ 30.21	$ 70.26	$ 100.78	$ 479.45	$ 76.25	$ 213.35	$ 1,406.54	$ 1,761.39
90	Demand & Customer (per cust month)		$ 61.14		$ 53.55	$ 58.42	$ 136.47	$ 491.81	$ 2,379.62	$ 131.38	$ 838.80	$ 4,206.17	$ 12,044.68
91	**BILLING DETERMINANTS**												
92	Demand (Peak Day Demand * 12)	PDAY	4,806,857	-	2,825,040	178,416	329,100	859,980	19,740	11,592	320,926	108,337	153,726
93	Commodity	COM	38,211,546	-	18,958,326	1,294,228	2,201,607	6,255,510	70,034	104,599	3,390,078	2,233,913	3,703,251
94	Customers (Number of Bills)	CUST	2,578,816	-	2,373,901	125,892	53,435	18,419	84	2,427	4,226	312	120

NATIONAL FUEL EXHIBIT E

PROOF OF REVENUE

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Proof of Revenue Summary (Including PGC Revenue)

	Average Customers	Sales (Mcf)	Current Revenue[1]	Proposed Revenue[2]	Change in Revenue	Percent Change	Percent of Total Rate Increase
Residential	197,825	18,958,326	$ 198,187,168	$ 213,590,704	$ 15,403,535	7.8%	78.3%
SCPA < 250	10,491	1,294,228	$ 12,829,261	$ 13,711,953	$ 882,692	6.9%	4.5%
SCPA > 250	4,453	2,201,607	$ 14,778,754	$ 15,683,365	$ 904,611	6.1%	4.6%
LCPA	1,535	6,255,510	$ 20,517,004	$ 21,858,868	$ 1,341,863	6.5%	6.8%
NGV	7	70,034	$ 529,199	$ 549,962	$ 20,763	3.9%	0.1%
SVIS	202	104,599	$ 807,299	$ 850,112	$ 42,813	5.3%	0.2%
IVIS	352	3,390,078	$ 8,051,092	$ 8,618,057	$ 566,965	7.0%	2.9%
LVIS	26	2,233,913	$ 2,959,571	$ 3,222,999	$ 263,427	8.9%	1.3%
LIS	10	3,703,251	$ 2,645,906	$ 2,884,257	$ 238,351	9.0%	1.2%
LIS Negotiated	10	9,037,676	$ 2,945,197	$ 2,876,862	$ (68,334)	-2.3%	-0.3%
Total	214,911	47,249,221	$ 264,250,453	$ 283,847,139	$ 19,596,686	7.4%	99.6%
Other Operating Revenue			$ 1,273,368	$ 1,357,185	$ 83,817	6.6%	0.4%
Grand Total	214,911	47,249,221	$ 265,523,820	$ 285,204,324	$ 19,680,503	7.4%	100.0%

1 See National Fuel Exhibit CTM-1, Schedule 2
2 See National Fuel Exhibit CTM-2, Schedule 2

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Proof of Revenue Summary (Excluding PGC Revenue)

	Average Customers	Sales (Mcf)	Current Revenue[1]	Proposed Revenue[2]	Change in Revenue	Percent Change	Percent of Total Rate Increase
Residential	197,825	18,958,326	$ 97,367,043	$ 112,770,578	$ 15,403,535	15.8%	78.3%
SCPA < 250	10,491	1,294,228	$ 6,819,476	$ 7,702,168	$ 882,692	12.9%	4.5%
SCPA > 250	4,453	2,201,607	$ 6,988,813	$ 7,893,424	$ 904,611	12.9%	4.6%
LCPA	1,535	6,255,510	$ 13,907,541	$ 15,249,405	$ 1,341,863	9.6%	6.8%
NGV	7	70,034	$ 131,245	$ 152,008	$ 20,763	15.8%	0.1%
SVIS	202	104,599	$ 443,729	$ 486,542	$ 42,813	9.6%	0.2%
IVIS	352	3,390,078	$ 5,876,219	$ 6,443,184	$ 566,965	9.6%	2.9%
LVIS	26	2,233,913	$ 2,730,253	$ 2,993,681	$ 263,427	9.6%	1.3%
LIS	10	3,703,251	$ 2,470,353	$ 2,708,704	$ 238,351	9.6%	1.2%
LIS Negotiated	10	9,037,676	$ 2,945,197	$ 2,876,862	$ (68,334)	-2.3%	-0.3%
Total	214,911	47,249,221	$ 139,679,870	$ 159,276,556	$ 19,596,686	14.0%	99.6%
Other Operating Revenue			$ 1,273,368	$ 1,357,185	$ 83,817	6.6%	0.4%
Grand Total	214,911	47,249,221	$ 140,953,238	$ 160,633,741	$ 19,680,503	14.0%	100.0%

1 See National Fuel Exhibit CTM-1, Schedule 2
2 See National Fuel Exhibit CTM-2, Schedule 2

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Proof of Revenue Summary (Excluding PGC Revenue and Including Rider I)

	Average Customers	Sales (Mcf)	Current Revenue[1]	Proposed Revenue[2]	Change in Revenue	Percent Change	Percent of Total Rate Increase
Residential	197,825	18,958,326	$ 97,367,043	$ 108,392,017	$ 11,024,974	11.3%	81.5%
SCPA < 250	10,491	1,294,228	$ 6,819,476	$ 7,568,173	$ 748,698	11.0%	5.5%
SCPA > 250	4,453	2,201,607	$ 6,988,813	$ 7,619,105	$ 630,291	9.0%	4.7%
LCPA	1,535	6,255,510	$ 13,907,541	$ 14,458,098	$ 550,557	4.0%	4.1%
NGV	7	70,034	$ 131,245	$ 152,008	$ 20,763	15.8%	0.2%
SVIS	202	104,599	$ 443,729	$ 481,267	$ 37,538	8.5%	0.3%
IVIS	352	3,390,078	$ 5,876,219	$ 6,211,051	$ 334,832	5.7%	2.5%
LVIS	26	2,233,913	$ 2,730,253	$ 2,824,869	$ 94,615	3.5%	0.7%
LIS	10	3,703,251	$ 2,470,353	$ 2,534,089	$ 63,736	2.6%	0.5%
LIS Negotiated	10	9,037,676	$ 2,945,197	$ 2,876,862	$ (68,334)	-2.3%	-0.5%
Total	214,911	47,249,221	$ 139,679,870	$ 153,117,540	$ 13,437,670	9.6%	99.4%
Other Operating Revenue			$ 1,273,368	$ 1,357,185	$ 83,817	6.6%	0.6%
Grand Total	214,911	47,249,221	$ 140,953,238	$ 154,474,725	$ 13,521,487	9.6%	100.0%

1 See National Fuel Exhibit CTM-1, Schedule 2
2 See National Fuel Exhibit CTM-2, Schedule 2

BOOK VI

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

BEFORE

THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Information Submitted Pursuant to

Section 53.51 et seq of the Commission's Regulations

NATIONAL FUEL EXHIBIT C - DEPRECIATION STUDY FULLY PROJECTED

NATIONAL FUEL EXHIBIT C - DEPRECIATION STUDY FUTURE

NATIONAL FUEL EXHIBIT C - DEPRECIATION STUDY HISTORIC

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
GAS - PA P.U.C. NO. 9
SUPPLEMENT NO. 294

DOCKET NO. R-2025-3059478

Issued: January 28, 2026 **Effective: March 29, 2026**

NATIONAL FUEL EXHIBIT C

DEPRECIATION STUDY - FPFTY

2027 DEPRECIATION STUDY

CALCULATED ANNUAL DEPRECIATION
ACCRUALS RELATED TO GAS PLANT
AS OF OCTOBER 31, 2027

Prepared by:

GANNETT FLEMING VALUATION AND RATE CONSULTANTS LLC

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

PENNSYLVANIA DIVISION

Erie, Pennsylvania

2027 DEPRECIATION STUDY

CALCULATED ANNUAL DEPRECIATION ACCRUALS
RELATED TO GAS PLANT
AS OF OCTOBER 31, 2027

GANNETT FLEMING VALUATION AND RATE CONSULTANTS, LLC

Mechanicsburg, Pennsylvania

Gannett Fleming Valuation and Rate Consultants, LLC
(a GFT Company)

300 Sterling Parkway, Suite 200
Mechanicsburg, PA 17050
717.763.7211

January 13, 2026

National Fuel Gas Distribution Corporation
6363 Main Street
Williamsville, NY 14221-5887

Attention Brian M. Welsch
Vice President

Ladies and Gentlemen:

Pursuant to your request, we have determined the annual depreciation accruals applicable to gas plant as of October 31, 2027. The results of our study as of September 30, 2026 are presented in our report titled "2026 Depreciation Study - Calculated Annual Depreciation Accruals Related to Gas Plant as of September 30, 2026". The same methods, procedures and estimates are used in both studies.

Summaries of the original cost, annual accruals, book depreciation reserve and amortization of net salvage are presented in Tables 1 through 4, beginning on page I-3 of the attached report.

Respectfully submitted,

GANNETT FLEMING VALUATION
AND RATE CONSULTANTS, LLC

JOHN J. SPANOS
President

MELISSA M. HOWARD
Project Manager

084506.100

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PART I. RESULTS OF STUDY

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

PENNSYLVANIA DIVISION

DEPRECIATION STUDY

PART I. RESULTS OF STUDY

DESCRIPTION OF SUMMARY TABULATIONS

Tables 1 through 4 presented on pages I-3 through I-8 summarize the results of the depreciation study as of October 31, 2027. Table 1 sets forth, by depreciable group, the estimated survivor curve, original cost, book depreciation reserve as of October 31, 2027, future book accruals, calculated annual accrual amount and rate, and composite remaining life for plant in service. Table 2 presents the bringforward of the book reserve to October 31, 2027. Table 3 sets forth the calculations of the depreciation accruals for the thirteen months ended October 31, 2027. Table 4 presents the annual amortization of experienced and estimated net salvage based on the period 2023 through 2027.

DESCRIPTION OF DETAILED TABULATIONS

The supporting data for the depreciation calculations are presented in account sequence in the section beginning on page II-7. The original cost, calculated accrued depreciation, allocated book reserve, future accruals, remaining life and annual accrual are shown for each vintage of each account or subaccount. The amounts of regular retirements, gross salvage and cost of removal are set forth by account for the years 2023 through 2027, on pages III-2 and III-3.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF OCTOBER 31, 2027

	DEPRECIABLE GROUP	SURVIVOR CURVE	ORIGINAL COST AS OF OCTOBER 31, 2027	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	COMPOSITE REMAINING LIFE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)=(6)/(3)	(8)=(5)/(6)
DEPRECIABLE PLANT								
303	MISCELLANEOUS INTANGIBLE PLANT	10-SQ	24,487,946.38	22,980,541	1,507,405	349,664	1.43	4.3
PRODUCTION PLANT								
325.4	RIGHTS OF WAY	70-R4	60,320.48	35,207	25,113	609	1.01	41.2
328	MEASURING AND REGULATING STATION STRUCTURES	30-L2.5	12,094.97	9,624	2,471	116	0.96	21.3
329	OTHER STRUCTURES	40-SQ	3,168.30	1,425	1,743	84	2.65	20.8
332	FIELD LINES	50-R1.5	532,547.44	174,997	357,550	13,640	2.56	26.2
334	MEASURING AND REGULATING STATION EQUIPMENT	32-O1	3,914,290.66	1,776,611	2,137,680	131,962	3.37	16.2
TOTAL PRODUCTION PLANT			**4,522,421.85**	**1,997,864**	**2,524,557**	**146,411**	**3.24**	
TRANSMISSION PLANT								
365.2	RIGHTS OF WAY	80-R4	3,362,805.19	698,575	2,664,230	43,437	1.29	61.3
366.2	MEASURING AND REGULATING STATION STRUCTURES	60-R2	298,917.97	121,248	177,670	5,712	1.91	31.1
366.3	OTHER STRUCTURES	60-R2	6,782.92	3,565	3,218	84	1.24	38.3
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	70-R2	85,799,712.21	20,884,359	64,915,353	1,451,924	1.69	44.7
367.2	MAINS - CATHODIC PROTECTION	27-S2.5	6,367,938.03	2,404,973	3,962,965	220,974	3.47	17.9
369	MEASURING AND REGULATING STATION EQUIPMENT							
	1980 AND PRIOR	30-R0.5	215,720.24	215,720	0	0	-	-
	1981 AND SUBSEQUENT	40-R1.5	10,199,251.32	4,227,037	5,972,214	182,136	1.79	32.8
	TOTAL ACCOUNT 369		10,414,971.56	4,442,757	5,972,214	182,136	1.75	32.8
TOTAL TRANSMISSION PLANT			**106,251,127.88**	**28,555,477**	**77,695,650**	**1,904,267**	**1.79**	
DISTRIBUTION PLANT								
374.2	RIGHTS OF WAY	80-R4	17,090,714.08	3,404,730	13,685,984	224,740	1.31	60.9
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	VARIOUS *	11,875,523.78	6,615,862	5,259,663	390,001	3.28	13.5
375.4	STRUCTURES AND IMPROVEMENTS - SMALL	40-R0.5	2,036,506.13	311,546	1,724,960	47,630	2.34	36.2
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	70-L1.5	426,654,001.60	119,581,152	307,072,850	7,546,538	1.77	40.7
376.2	MAINS - CATHODIC PROTECTION	27-S2.5	3,009,235.48	1,786,229	1,223,006	82,809	2.75	14.8
378	MEASURING AND REGULATING STATION EQUIPMENT	40-R0.5	11,811,798.18	4,610,360	7,201,438	343,538	2.91	21.0
380	SERVICES	55-R0.5	245,616,638.42	91,471,655	154,144,983	5,246,522	2.14	29.4
381	METERS	37-R1.5	18,771,077.33	7,079,694	11,691,383	549,100	2.93	21.3
382	METER INSTALLATIONS	55-R0.5	3,769,202.49	1,965,147	1,804,055	65,069	1.73	27.7
384	HOUSE REGULATOR INSTALLATIONS	55-R0.5	1,310,503.47	620,091	690,412	23,742	1.81	29.1
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	55-R2	20,008,270.22	7,654,318	12,353,952	372,104	1.86	33.2
TOTAL DISTRIBUTION PLANT			**761,953,471.18**	**245,100,784**	**516,852,686**	**14,891,793**	**1.95**	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF OCTOBER 31, 2027

	DEPRECIABLE GROUP	SURVIVOR CURVE	ORIGINAL COST AS OF OCTOBER 31, 2027	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	COMPOSITE REMAINING LIFE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)=(6)/(3)	(8)=(5)/(6)
GENERAL PLANT								
390.11	OTHER SMALL STRUCTURES	40-R0.5	1,443,596.77	156,669	1,286,928	59,897	4.15	21.5
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	25-SQ	389,725.94	150,489	239,237	13,745	3.53	17.4
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	15-SQ	294,962.33	212,829	82,133	5,897	**	13.9
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	5-SQ	9,304,387.88	5,059,293	4,245,095	1,591,732	17.11	2.7
392	TRANSPORTATION EQUIPMENT		17,271,022.03	8,517,958	8,753,064	2,180,199	***	
394	TOOLS, SHOP AND GARAGE EQUIPMENT	25-SQ	12,168,098.41	2,723,391	9,444,707	487,618	4.01	19.4
396	POWER OPERATED EQUIPMENT AND TOOLS		12,847,131.23	3,400,852	9,446,279	1,303,899	***	
397	COMMUNICATION EQUIPMENT	10-SQ	5,002,361.40	1,750,649	3,251,712	490,510	9.81	6.6
TOTAL GENERAL PLANT			**58,721,285.99**	**21,972,130**	**36,749,155**	**6,133,497**	**10.45**	
TOTAL DEPRECIABLE GAS PLANT			**955,936,253.28**	**320,606,796**	**635,329,453**	**23,425,632**	**2.45**	
NONDEPRECIABLE PLANT								
	INTANGIBLE PLANT		123,845.54					
	PRODUCTION PLANT		2,840.80					
	TRANSMISSION PLANT		23,594.83	(256)				
	DISTRIBUTION PLANT		1,083,410.41	4,041				
	GENERAL PLANT		67,330.91	(25,212)				
TOTAL NONDEPRECIABLE PLANT			**1,301,022.49**	**(21,427)**				
TOTAL GAS PLANT			**957,237,275.77**	**320,585,369**	**635,329,453**	**23,425,632**		

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* LIFE SPAN PROCEDURE WAS USED. INTERIM SURVIVOR CURVES ARE 60-S0 AND 40-R0.5.
** ASSETS ADDED IN ACCOUNT 391.2 WILL BE GIVEN A 6.67 RATE BASED ON A 15-YEAR AMORTIZATION PERIOD
*** ASSETS ARE INDIVIDUALLY DEPRECIATED.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 2. BRINGFORWARD TO OCTOBER 31, 2027 OF THE BOOK RESERVE AS OF SEPTEMBER 30, 2026

	ACCOUNT	BOOK RESERVE AS OF SEPTEMBER 30, 2026	+	ANNUAL ACCRUALS	-	RETIREMENTS	+	AMORTIZATION OF NET SALVAGE	+	GROSS SALVAGE	-	COST OF REMOVAL	+	MISCELLANEOUS DEBITS AND CREDITS	=	BOOK RESERVE AS OF OCTOBER 31, 2027	BOOK RESERVE AS A PERCENT OF ORIGINAL COST
	(1)	(2)		(3)		(4)		(5)		(6)		(7)		(8)		(9)	(10)
303	MISCELLANEOUS INTANGIBLE PLANT	22,593,631		386,910												22,980,541	93.84
325.4	RIGHTS OF WAY	35,810		536		1,139										35,207	58.37
328	MEASURING AND REGULATING STATION STRUCTURES	9,773		69		218										9,624	79.57
329	OTHER STRUCTURES	1,403		79		57										1,425	44.98
332	FIELD LINES	171,978		12,612		9,593										174,997	32.86
334	MEASURING AND REGULATING STATION EQUIPMENT	1,733,727		117,984		69,740		6,109				11,469				1,776,611	45.39
365.1	LAND	(106)				150										(256)	(1.08)
365.2	RIGHTS OF WAY	682,851		38,650		22,925										698,575	20.77
366.2	MEASURING AND REGULATING STATION STRUCTURES	118,684		4,962		2,098		329				629				121,248	40.56
366.3	OTHER STRUCTURES	3,593		46		75										3,565	52.56
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	20,383,572		1,257,626		586,083		77,863				248,618				20,884,359	24.34
367.2	MAINS - CATHODIC PROTECTION	2,294,098		177,461		65,120		672				2,137				2,404,973	37.77
369	MEASURING AND REGULATING STATION EQUIPMENT	4,412,402		146,657		72,747		14,437				57,991				4,442,757	42.66
374.1	LAND	12,895				5,123		5,864		651		10,245				4,041	0.37
374.2	RIGHTS OF WAY	3,338,953		213,691		81,963		13,800				79,750				3,404,730	19.92
375	STRUCTURES AND IMPROVEMENTS	6,551,188		424,008		67,327		68,419		7		48,887				6,927,408	49.79
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	114,664,307		7,223,356		2,037,997		1,098,797		12,218		1,379,529				119,581,152	28.03
376.2	MAINS - CATHODIC PROTECTION	1,732,866		74,830		20,586		735				1,616				1,786,229	59.36
378	MEASURING AND REGULATING STATION EQUIPMENT	4,293,395		333,897		57,081		55,794				15,645				4,610,360	39.03
380	SERVICES	87,631,319		4,934,835		1,192,485		323,183				225,196				91,471,655	37.24
381	METERS	6,622,195		536,900		79,401										7,079,694	37.72
382	METER INSTALLATIONS	1,924,742		58,700		18,295										1,965,147	52.14
384	HOUSE REGULATOR INSTALLATIONS	604,497		21,814		6,220										620,091	47.32
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	7,424,326		350,728		92,574		29,604		2		57,767				7,654,318	38.26
389.1	LAND	(20,689)				4,523										(25,212)	(37.44)
390.11	OTHER SMALL STRUCTURES	98,290		67,647		9,438		170								156,669	10.85
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	138,489		12,000												150,489	38.61
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	210,181		2,648												212,829	72.15
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	3,553,490		1,505,803												5,059,293	54.38
392	TRANSPORTATION EQUIPMENT	7,508,111		2,180,199		1,170,351										8,517,958	49.32
394	TOOLS, SHOP AND GARAGE EQUIPMENT	2,350,040		438,991		65,640										2,723,391	22.38
396	POWER OPERATED EQUIPMENT AND TOOLS	2,967,643		1,303,899		870,690										3,400,852	26.47
397	COMMUNICATION EQUIPMENT	1,603,148		456,958		309,457										1,750,649	35.00
TOTAL		**305,650,802**		**22,284,494**		**6,919,097**		**1,695,776**		**12,876**		**2,139,481**		**-**		**320,585,369**	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 3. CALCULATION OF DEPRECIATION ACCRUALS FOR THE THIRTEEN MONTHS ENDED OCTOBER 31, 2027

	DEPRECIABLE GROUP	ORIGINAL COST AS OF SEPTEMBER 30, 2026	ORIGINAL COST AS OF OCTOBER 31, 2027	COMPOSITE ACCRUAL RATE	13-MONTH ACCRUAL AMOUNT
	(1)	(3)	(3)	(4)	(5)*
DEPRECIABLE PLANT					
303	MISCELLANEOUS INTANGIBLE PLANT	24,487,946.38	24,487,946.38	1.58	386,910
PRODUCTION PLANT					
325.4	RIGHTS OF WAY	55,006.53	60,320.48	0.94	536
328	MEASURING AND REGULATING STATION STRUCTURES	11,077.40	12,094.97	0.60	69
329	OTHER STRUCTURES	2,904.48	3,168.30	2.62	79
332	FIELD LINES	487,774.55	532,547.44	2.50	12,612
334	MEASURING AND REGULATING STATION EQUIPMENT	3,588,782.71	3,914,290.66	3.18	117,984
TOTAL PRODUCTION PLANT		**4,145,545.67**	**4,522,421.85**		**131,279**
TRANSMISSION PLANT					
365.2	RIGHTS OF WAY	2,842,251.07	3,362,805.19	1.27	38,650
366.2	MEASURING AND REGULATING STATION STRUCTURES	251,285.57	298,917.97	1.84	4,962
366.3	OTHER STRUCTURES	5,081.76	6,782.92	0.81	46
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	72,491,899.16	85,799,712.21	1.62	1,257,626
367.2	MAINS - CATHODIC PROTECTION	4,889,292.14	6,367,938.03	3.25	177,461
369	MEASURING AND REGULATING STATION EQUIPMENT	8,763,147.86	10,414,971.56	1.56	146,657
TOTAL TRANSMISSION PLANT		**89,242,957.56**	**106,251,127.88**		**1,625,401**
DISTRIBUTION PLANT					
374.2	RIGHTS OF WAY	16,023,145.64	17,090,714.08	1.30	213,691
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	11,651,525.05	11,875,523.78	3.28	379,003
375.4	STRUCTURES AND IMPROVEMENTS - SMALL	1,383,573.65	2,036,506.13	2.19	45,005
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	400,109,007.61	426,654,001.60	1.76	7,223,356
376.2	MAINS - CATHODIC PROTECTION	2,741,104.22	3,009,235.48	2.63	74,830
378	MEASURING AND REGULATING STATION EQUIPMENT	11,068,313.02	11,811,798.18	2.94	333,897
380	SERVICES	230,084,470.78	245,616,638.42	2.09	4,934,835
381	METERS	17,736,870.40	18,771,077.33	2.96	536,900
382	METER INSTALLATIONS	3,530,905.96	3,769,202.49	1.62	58,700
384	HOUSE REGULATOR INSTALLATIONS	1,229,482.65	1,310,503.47	1.73	21,814
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	18,802,489.79	20,008,270.22	1.82	350,728
TOTAL DISTRIBUTION PLANT		**714,360,888.77**	**761,953,471.18**		**14,172,760**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 3. CALCULATION OF DEPRECIATION ACCRUALS FOR THE THIRTEEN MONTHS ENDED OCTOBER 31, 2027

	DEPRECIABLE GROUP	ORIGINAL COST AS OF SEPTEMBER 30, 2026	ORIGINAL COST AS OF OCTOBER 31, 2027	COMPOSITE ACCRUAL RATE	13-MONTH ACCRUAL AMOUNT
	(1)	(3)	(3)	(4)	(5)*
GENERAL PLANT					
390.11	OTHER SMALL STRUCTURES	1,428,040.58	1,443,596.77	4.72	67,647
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	328,739.97	389,725.94	3.40	12,000
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	244,973.84	294,962.33	1.00	2,648
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	7,740,747.62	9,304,387.88	18.01	1,505,803
392	TRANSPORTATION EQUIPMENT	15,360,082.17	17,271,022.03	**	2,180,199
394	TOOLS, SHOP AND GARAGE EQUIPMENT	10,297,183.94	12,168,098.41	3.97	438,991
396	POWER OPERATED EQUIPMENT AND TOOLS	11,426,348.22	12,847,131.23	**	1,303,899
397	COMMUNICATION EQUIPMENT	4,335,043.11	5,002,361.40	9.75	456,958
TOTAL GENERAL PLANT		**51,161,159.45**	**58,721,285.99**		**5,968,145**
TOTAL DEPRECIABLE GAS PLANT		**883,398,497.83**	**955,936,253.28**		**22,284,494**

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* 13-MONTH TOTAL BASED ON MONTHLY AVERAGES
** ASSETS ARE INDIVIDUALLY DEPRECIATED

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

TABLE 4. AMORTIZATION OF EXPERIENCED AND ESTIMATED NET SALVAGE

	2023			2024			2025			2026			2027				
ACCOUNT	GROSS SALVAGE		COST OF REMOVAL	GROSS SALVAGE		COST OF REMOVAL	GROSS SALVAGE		COST OF REMOVAL	GROSS SALVAGE		COST OF REMOVAL	GROSS SALVAGE		COST OF REMOVAL		NET SALVAGE	SALVAGE ACCRUAL
(1)	(2)	-	(3)	(4)	-	(5)	(6)	-	(7)	(8)	-	(9)	(10)	-	(11)	=	(12)*	(13)=(12)/5
334.00			1,448.50			5,217.60			8,332.68			10,576.24			11,469.09		(37,044.11)	(7,409.00)
366.20						1,202.58						444.53			629.33		(2,276.44)	(455.00)
367.10			5,665.57			57,623.78			121,648.30			175,612.42			248,618.00		(609,168.07)	(121,834.00)
367.20			979.24			219.03			454.86			1,509.70			2,137.31		(5,300.13)	(1,060.00)
369.00			8,681.35			6,731.04			10,376.84			40,962.40			57,991.28		(124,742.91)	(24,949.00)
374.10	11,154.00		6,697.10	(10,168.60)		12,578.00			2,973.56	546.08		8,600.68	650.50		10,245.35		(38,912.71)	(7,783.00)
374.20			456.66						1,596.99			66,948.27			79,750.44		(148,752.36)	(29,750.00)
375.00	50.00		154,258.11			34,621.65			45,560.60	5.50		41,039.56	6.55		48,887.34		(324,305.21)	(64,861.00)
376.10	4,016.83		859,668.17	16,961.74		1,694,252.35			1,165,856.83	10,256.46		1,158,075.86	12,217.75		1,379,528.65		(6,213,929.08)	(1,242,786.00)
376.20			2,271.96			45.12						1,356.42			1,615.80		(5,289.29)	(1,058.00)
378.00			38,865.63			36,321.76			99,188.50			13,133.20			15,644.59		(203,153.68)	(40,631.00)
380.00			274,336.97			359,987.72			523,728.59			189,046.12			225,196.43		(1,572,295.83)	(314,459.00)
385.00			10,669.49	0.96		49,516.78			26,736.86	1.35		48,493.97	1.61		57,767.22		(193,180.41)	(38,636.00)
390.00			852.37														(852.37)	(170.00)
TOTAL	**15,220.83**		**1,364,851.12**	**6,794.10**		**2,258,317.41**	**0.00**		**2,006,454.61**	**10,809.38**		**1,755,799.36**	**12,876.41**		**2,139,480.81**		**(9,479,202.60)**	**(1,895,841)**

* COLUMN (12) EQUALS THE SUMMATION OF COLUMNS (2) THROUGH (11).

PART II. DETAILED DEPRECIATION CALCULATIONS

CUMULATIVE DEPRECIATED ORIGINAL COST

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
CUMULATIVE DEPRECIATED ORIGINAL COST BY YEAR INSTALLED
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR INST (1)	ORIGINAL COST (2)	ACCRUED DEPRECIATION (3)	AMOUNT (2) - (3) (4)	DEPRECIATED ORIGINAL COST CUMULATIVE AMOUNT (5)	DEPRECIATED ORIGINAL COST PCT OF COL 4 TOTAL (6)
1883	3,083.00	2,689.00	394.00	394.00	
1884	1,114.00	965.00	149.00	543.00	
1885	2,279.00	1,991.00	288.00	831.00	
1886	19,004.00	16,585.00	2,419.00	3,250.00	
1887	43,167.00	37,206.00	5,961.00	9,211.00	
1888	35,668.00	30,971.00	4,697.00	13,908.00	
1889	317.00	284.00	33.00	13,941.00	
1890	73.00	69.00	4.00	13,945.00	
1891	633.00	559.00	74.00	14,019.00	
1892	1,104.00	956.00	148.00	14,167.00	
1893	512.00	444.00	68.00	14,235.00	
1894	292.00	260.00	32.00	14,267.00	
1895	515.00	449.00	66.00	14,333.00	
1896	381.00	346.00	35.00	14,368.00	
1897	352.00	330.00	22.00	14,390.00	
1898	245.00	235.00	10.00	14,400.00	
1899	47,222.00	40,060.00	7,162.00	21,562.00	
1900	10.00	10.00		21,562.00	
1901	800.00	758.00	42.00	21,604.00	
1902	2,653.00	2,526.00	127.00	21,731.00	
1903	3,743.00	3,652.00	91.00	21,822.00	
1904	2,396.00	2,387.00	9.00	21,831.00	
1905	2,494.00	2,428.00	66.00	21,897.00	
1906	2,079.00	2,075.00	4.00	21,901.00	
1907	2,152.00	2,152.00		21,901.00	
1908	1,871.00	1,871.00		21,901.00	
1909	1,613.00	1,592.00	21.00	21,922.00	
1910	1,366.00	1,360.00	6.00	21,928.00	
1911	5,008.00	4,245.00	763.00	22,691.00	
1912	2,496.00	2,129.00	367.00	23,058.00	
1913	2,544.00	2,181.00	363.00	23,421.00	
1914	2,271.00	1,968.00	303.00	23,724.00	
1915	1,421.00	1,337.00	84.00	23,808.00	
1916	115,374.00	95,671.00	19,703.00	43,511.00	
1917	2,604.00	2,239.00	365.00	43,876.00	
1918	7,728.00	7,296.00	432.00	44,308.00	
1919	19,220.00	15,883.00	3,337.00	47,645.00	
1920	6,012.00	5,000.00	1,012.00	48,657.00	
1921	16,581.00	13,872.00	2,709.00	51,366.00	
1922	16,825.00	14,136.00	2,689.00	54,055.00	
1923	10,161.00	8,812.00	1,349.00	55,404.00	
1924	35,668.00	29,450.00	6,218.00	61,622.00	
1925	64,243.00	52,245.00	11,998.00	73,620.00	
1926	117,132.00	93,557.00	23,575.00	97,195.00	
1927	78,405.00	62,295.00	16,110.00	113,305.00	
1928	52,511.00	43,019.00	9,492.00	122,797.00	
1929	83,117.00	66,141.00	16,976.00	139,773.00	
1930	93,288.00	73,681.00	19,607.00	159,380.00	
1931	55,444.00	45,661.00	9,783.00	169,163.00	
1932	25,708.00	20,729.00	4,979.00	174,142.00	
1933	8,559.00	7,228.00	1,331.00	175,473.00	
1934	28,623.00	23,055.00	5,568.00	181,041.00	
1935	39,934.00	31,961.00	7,973.00	189,014.00	
1936	59,224.00	51,166.00	8,058.00	197,072.00	
1937	53,751.00	42,643.00	11,108.00	208,180.00	
1938	49,497.00	38,999.00	10,498.00	218,678.00	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
CUMULATIVE DEPRECIATED ORIGINAL COST BY YEAR INSTALLED
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR INST (1)	ORIGINAL COST (2)	ACCRUED DEPRECIATION (3)	AMOUNT (2) - (3) (4)	DEPRECIATED ORIGINAL COST CUMULATIVE AMOUNT (5)	DEPRECIATED ORIGINAL COST PCT OF COL 4 TOTAL (6)
1939	35,498.00	27,917.00	7,581.00	226,259.00	
1940	26,189.00	20,564.00	5,625.00	231,884.00	
1941	38,300.00	30,304.00	7,996.00	239,880.00	
1942	10,912.00	8,886.00	2,026.00	241,906.00	
1943	83,253.00	76,901.00	6,352.00	248,258.00	
1944	5,445.00	4,346.00	1,099.00	249,357.00	
1945	10,430.00	8,215.00	2,215.00	251,572.00	
1946	40,480.00	31,193.00	9,287.00	260,859.00	
1947	175,892.00	140,689.00	35,203.00	296,062.00	
1948	127,431.00	96,813.00	30,618.00	326,680.00	0.10
1949	213,944.00	158,671.00	55,273.00	381,953.00	0.10
1950	277,043.00	204,274.00	72,769.00	454,722.00	0.10
1951	297,665.00	219,626.00	78,039.00	532,761.00	0.10
1952	215,719.00	163,216.00	52,503.00	585,264.00	0.10
1953	473,664.00	390,759.00	82,905.00	668,169.00	0.10
1954	335,328.00	252,461.00	82,867.00	751,036.00	0.10
1955	1,002,992.00	755,951.00	247,041.00	998,077.00	0.20
1956	1,458,690.00	1,131,004.00	327,686.00	1,325,763.00	0.20
1957	720,265.00	569,073.00	151,192.00	1,476,955.00	0.20
1958	271,006.00	199,738.00	71,268.00	1,548,223.00	0.30
1959	525,148.00	390,824.00	134,324.00	1,682,547.00	0.30
1960	327,450.00	254,339.00	73,111.00	1,755,658.00	0.30
1961	379,798.00	284,593.00	95,205.00	1,850,863.00	0.30
1962	343,451.00	261,369.00	82,082.00	1,932,945.00	0.30
1963	486,435.00	361,883.00	124,552.00	2,057,497.00	0.30
1964	589,696.00	428,061.00	161,635.00	2,219,132.00	0.40
1965	1,345,456.00	995,349.00	350,107.00	2,569,239.00	0.40
1966	1,661,241.00	1,174,720.00	486,521.00	3,055,760.00	0.50
1967	2,453,943.00	1,779,624.00	674,319.00	3,730,079.00	0.60
1968	1,706,572.00	1,184,335.00	522,237.00	4,252,316.00	0.70
1969	1,915,888.00	1,324,893.00	590,995.00	4,843,311.00	0.80
1970	2,072,390.00	1,451,238.00	621,152.00	5,464,463.00	0.90
1971	2,530,447.00	1,720,829.00	809,618.00	6,274,081.00	1.00
1972	2,478,633.00	1,721,372.00	757,261.00	7,031,342.00	1.10
1973	3,469,965.00	2,417,043.00	1,052,922.00	8,084,264.00	1.30
1974	2,904,457.00	2,000,994.00	903,463.00	8,987,727.00	1.50
1975	2,064,547.00	1,455,236.00	609,311.00	9,597,038.00	1.60
1976	2,199,246.00	1,497,393.00	701,853.00	10,298,891.00	1.70
1977	5,234,092.00	3,494,011.00	1,740,081.00	12,038,972.00	2.00
1978	4,291,917.00	2,779,565.00	1,512,352.00	13,551,324.00	2.20
1979	4,640,232.00	3,193,539.00	1,446,693.00	14,998,017.00	2.40
1980	5,932,650.00	3,916,061.00	2,016,589.00	17,014,606.00	2.80
1981	5,622,171.00	3,692,755.00	1,929,416.00	18,944,022.00	3.10
1982	5,443,572.00	3,488,872.00	1,954,700.00	20,898,722.00	3.40
1983	6,890,378.00	4,369,852.00	2,520,526.00	23,419,248.00	3.80
1984	7,793,606.00	4,821,837.00	2,971,769.00	26,391,017.00	4.30
1985	8,196,019.00	4,946,549.00	3,249,470.00	29,640,487.00	4.80
1986	10,714,587.00	6,539,897.00	4,174,690.00	33,815,177.00	5.50
1987	8,590,866.00	5,165,248.00	3,425,618.00	37,240,795.00	6.00
1988	15,677,334.00	9,295,425.00	6,381,909.00	43,622,704.00	7.10
1989	13,539,931.00	7,935,617.00	5,604,314.00	49,227,018.00	8.00
1990	13,663,672.00	7,854,831.00	5,808,841.00	55,035,859.00	8.90
1991	13,133,661.00	7,337,555.00	5,796,106.00	60,831,965.00	9.90
1992	13,534,314.00	7,407,145.00	6,127,169.00	66,959,134.00	10.90
1993	13,866,642.00	7,554,313.00	6,312,329.00	73,271,463.00	11.90
1994	11,839,863.00	6,306,973.00	5,532,890.00	78,804,353.00	12.80

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
CUMULATIVE DEPRECIATED ORIGINAL COST BY YEAR INSTALLED
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR INST (1)	ORIGINAL COST (2)	ACCRUED DEPRECIATION (3)	AMOUNT (2) - (3) (4)	DEPRECIATED ORIGINAL COST CUMULATIVE AMOUNT (5)	DEPRECIATED ORIGINAL COST PCT OF COL 4 TOTAL (6)
1995	13,376,048.00	7,170,942.00	6,205,106.00	85,009,459.00	13.80
1996	12,502,736.00	6,480,280.00	6,022,456.00	91,031,915.00	14.80
1997	14,391,021.00	7,258,324.00	7,132,697.00	98,164,612.00	15.90
1998	11,581,172.00	5,996,074.00	5,585,098.00	103,749,710.00	16.80
1999	11,795,455.00	5,785,637.00	6,009,818.00	109,759,528.00	17.80
2000	13,226,524.00	7,192,979.00	6,033,545.00	115,793,073.00	18.80
2001	10,134,725.00	5,124,941.00	5,009,784.00	120,802,857.00	19.60
2002	11,563,206.00	5,221,107.00	6,342,099.00	127,144,956.00	20.60
2003	11,298,232.00	5,012,380.00	6,285,852.00	133,430,808.00	21.60
2004	11,093,759.00	4,956,747.00	6,137,012.00	139,567,820.00	22.60
2005	9,447,743.00	4,107,498.00	5,340,245.00	144,908,065.00	23.50
2006	11,153,497.00	4,459,264.00	6,694,233.00	151,602,298.00	24.60
2007	16,008,752.00	6,224,729.00	9,784,023.00	161,386,321.00	26.20
2008	12,989,918.00	4,830,096.00	8,159,822.00	169,546,143.00	27.50
2009	13,916,968.00	4,914,957.00	9,002,011.00	178,548,154.00	28.90
2010	12,491,861.00	4,433,885.00	8,057,976.00	186,606,130.00	30.20
2011	14,822,132.00	5,494,503.00	9,327,629.00	195,933,759.00	31.70
2012	13,404,008.00	4,336,373.00	9,067,635.00	205,001,394.00	33.20
2013	16,535,438.00	5,050,545.00	11,484,893.00	216,486,287.00	35.10
2014	15,265,906.00	4,264,033.00	11,001,873.00	227,488,160.00	36.90
2015	19,108,575.00	5,856,900.00	13,251,675.00	240,739,835.00	39.00
2016	34,856,913.00	20,664,546.00	14,192,367.00	254,932,202.00	41.30
2017	19,174,300.00	5,010,447.00	14,163,853.00	269,096,055.00	43.60
2018	20,118,370.00	4,318,972.00	15,799,398.00	284,895,453.00	46.20
2019	29,073,990.00	5,348,525.00	23,725,465.00	308,620,918.00	50.00
2020	26,466,294.00	4,903,723.00	21,562,571.00	330,183,489.00	53.50
2021	29,228,527.00	5,296,320.00	23,932,207.00	354,115,696.00	57.40
2022	25,680,124.00	4,824,133.00	20,855,991.00	374,971,687.00	60.80
2023	42,623,473.00	6,194,236.00	36,429,237.00	411,400,924.00	66.70
2024	45,090,521.00	3,503,896.00	41,586,625.00	452,987,549.00	73.40
2025	35,569,785.00	3,362,286.00	32,207,499.00	485,195,048.00	78.60
2026	62,642,932.00	2,748,914.00	59,894,018.00	545,089,066.00	88.30
2027	74,074,293.00	2,033,242.00	72,041,051.00	617,130,117.00	100.00
TOTAL	925,818,101.00	308,687,984.00	617,130,117.00		

UTILITY PLANT IN SERVICE

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 303 MISCELLANEOUS INTANGIBLE PLANT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 10-SQUARE						
NET SALVAGE PERCENT: 0						
2000	1,835,295.50	1,835,296	1,835,296			
2001	86,002.52	86,003	86,003			
2004	172,450.99	172,451	172,451			
2005	34,999.69	35,000	35,000			
2011	876,413.25	876,413	876,413			
2012	27,934.56	27,935	27,935			
2013	95,201.98	95,202	95,202			
2014	39,761.48	39,761	39,761			
2015	1,094,952.45	1,094,952	1,094,952			
2016	16,231,676.82	16,231,677	16,231,677			
2017	560,328.17	560,328	560,328			
2018	37,961.74	35,431	34,905	3,057	1.00	3,057
2019	59,179.07	49,316	48,583	10,596	1.67	6,345
2020	596,972.41	437,778	431,273	165,699	2.67	62,060
2022	2,595,559.42	1,384,290	1,363,720	1,231,839	4.67	263,777
2024	143,256.33	47,752	47,042	96,214	6.67	14,425
	24,487,946.38	23,009,585	22,980,541	1,507,405		349,664

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 4.30 1.43

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 325.4 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-R4						
NET SALVAGE PERCENT: 0						
1941	407.86	387	408			
1943	4.03	4	4			
1951	42.64	39	43			
1952	18.68	17	19			
1953	238.19	214	238			
1961	1,102.26	943	1,102			
1963	341.13	285	341			
1965	473.87	390	470	4		
1966	1,647.46	1,334	1,609	38	12.67	3
1967	3,225.37	2,588	3,121	104	14.86	7
1970	6.54	5	6	1		
1975	1,062.46	773	932	130	18.57	7
1977	7.72	5	6	2		
1980	13,470.76	8,990	10,840	2,631	23.49	112
1986	731.99	439	529	203	29.00	7
1988	26.71	15	18	9		
1989	1,242.26	695	838	404	31.08	13
1990	18,653.45	10,168	12,262	6,391	31.18	205
1991	2,088.32	1,115	1,344	744	32.35	23
2000	80.51	33	40	41	41.00	1
2012	2,820.10	653	787	2,033	50.83	40
2026	6,175.70	125	151	6,025	64.78	93
2027	6,452.47	82	99	6,353	64.83	98
	60,320.48	29,299	35,207	25,113		609

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 41.20 1.01

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 328 MEASURING AND REGULATING STATION STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 30-L2.5						
NET SALVAGE PERCENT: 0						
1941	110.20	110	110			
1955	61.83	60	62			
1963	337.73	319	338			
1964	573.37	541	573			
1965	2,859.72	2,692	2,860			
1966	1,077.45	1,011	1,077			
1967	57.14	53	57			
1969	516.65	482	517			
1974	758.27	692	758			
1978	1,168.42	1,049	1,168			
1985	163.39	140	161	2		
1994	1,992.63	1,588	1,824	169	8.45	20
2026	1,182.59	63	72	1,111	23.64	47
2027	1,235.58	41	47	1,189	24.27	49
	12,094.97	8,841	9,624	2,471		116

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 21.30 0.96

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 329 OTHER STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 40-SQUARE						
NET SALVAGE PERCENT: 0						
2004	2,541.36	1,482	1,409	1,132	16.65	68
2026	306.60	10	9	298	37.25	8
2027	320.34	7	7	313	39.13	8
	3,168.30	1,499	1,425	1,743		84

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 20.80 2.65

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 332 FIELD LINES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 50-R1.5						
NET SALVAGE PERCENT: 0						
1961	589.81	520	447	143	8.94	16
1962	39,718.52	34,774	29,890	9,829	9.29	1,058
1965	5,732.94	4,931	4,239	1,494	10.16	147
1966	3,121.62	2,661	2,287	835	10.57	79
1967	9,604.83	8,171	7,023	2,582	10.58	244
1968	23.96	20	17	7	7.00	1
1973	17,473.42	14,146	12,159	5,314	12.77	416
1983	3,474.02	2,526	2,171	1,303	16.71	78
1985	881.25	623	536	345	17.25	20
1986	14,337.46	9,956	8,558	5,779	18.17	318
1993	74,323.09	45,932	39,482	34,841	21.22	1,642
2009	23,635.60	9,142	7,858	15,778	29.06	543
2010	9,363.97	3,473	2,985	6,379	29.40	217
2015	220,135.34	62,166	53,436	166,699	31.34	5,319
2018	3,934.78	881	757	3,178	32.43	98
2026	51,831.32	2,161	1,858	49,973	30.62	1,632
2027	54,365.51	1,506	1,294	53,072	29.29	1,812
	532,547.44	203,589	174,997	357,550		13,640

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 26.20 2.56

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 334 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 32-O1						
NET SALVAGE PERCENT: 0						
1958	1,324.71	1,325	1,325			
1964	289.24	288	289			
1965	3,787.19	3,730	3,787			
1966	4,660.83	4,574	4,661			
1967	4,149.44	4,031	4,149			
1969	437.01	418	437			
1971	103.64	97	104			
1973	408.06	375	408			
1974	93.42	85	93			
1975	529.50	479	530			
1976	12,314.33	10,999	12,314			
1977	4,259.77	3,774	4,260			
1978	27,681.66	24,172	27,682			
1979	53,534.86	46,318	53,229	306	7.46	41
1980	14,105.54	12,084	13,887	219	7.82	28
1981	15,702.13	13,314	15,301	401	8.35	48
1982	27,037.20	22,676	26,060	977	8.72	112
1983	24,925.21	20,663	23,746	1,179	9.14	129
1984	18,993.17	15,555	17,876	1,117	9.55	117
1985	60,285.32	48,747	56,021	4,264	10.01	426
1986	30,745.39	24,526	28,186	2,559	10.49	244
1987	57,955.16	45,582	52,383	5,572	10.95	509
1988	41,012.55	31,781	36,523	4,490	11.42	393
1989	48,965.64	37,542	43,144	5,822	11.67	499
1990	23,778.13	17,931	20,607	3,171	12.15	261
1991	48,973.99	36,476	41,919	7,055	12.44	567
1992	17,641.37	12,903	14,828	2,813	12.96	217
1993	37,356.28	26,934	30,953	6,403	13.28	482
1994	38,634.73	27,431	31,524	7,111	13.62	522
1995	19,918.90	13,911	15,987	3,932	13.94	282
1996	2,135.32	1,465	1,684	451	14.55	31
1997	5,331.87	3,590	4,126	1,206	14.71	82
1998	601.34	397	456	145	14.50	10
1999	12,499.81	8,075	9,280	3,220	15.56	207
2000	573.75	364	418	156	15.60	10
2001	69,951.49	43,475	49,962	19,989	16.04	1,246
2002	80,760.76	49,103	56,430	24,331	16.33	1,490
2003	51,996.64	30,870	35,476	16,521	16.65	992
2004	52,472.52	30,366	34,897	17,576	17.00	1,034
2005	80,236.05	45,333	52,097	28,139	17.19	1,637
2006	66,674.88	36,698	42,174	24,501	17.43	1,406
2007	136,551.99	73,028	83,925	52,627	17.69	2,975
2008	82,106.26	42,539	48,886	33,220	17.98	1,848
2009	41,451.27	20,821	23,928	17,523	18.16	965
2010	39,215.03	19,031	21,871	17,344	18.37	944
2011	254,252.95	119,194	136,979	117,274	18.51	6,336
2012	79,769.03	35,960	41,326	38,443	18.68	2,058
2013	207,691.76	89,598	102,967	104,725	18.89	5,544
2014	79,172.43	32,722	37,604	41,568	18.93	2,196
2015	46,977.20	18,481	21,239	25,738	19.02	1,353
2016	83,120.65	30,996	35,621	47,500	19.06	2,492
2017	163,682.71	57,502	66,082	97,601	19.08	5,115
2018	106,784.83	35,079	40,313	66,472	19.08	3,484

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 334 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 32-O1						
NET SALVAGE PERCENT: 0						
2019	88,985.21	27,140	31,189	57,796	18.99	3,043
2020	177,225.29	49,783	57,211	120,014	18.78	6,391
2021	94,253.20	23,940	27,512	66,741	18.60	3,588
2022	20,146.43	4,555	5,235	14,911	18.25	817
2023	98,402.63	19,277	22,153	76,250	17.79	4,286
2024	396.86	65	75	322	16.95	19
2025	282,964.20	35,597	40,908	242,056	16.22	14,923
2026	373,053.71	31,075	35,711	337,343	14.67	22,995
2027	395,248.22	23,201	26,663	368,585	13.37	27,568
	3,914,290.66	1,548,041	1,776,611	2,137,680		131,962

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 16.20 3.37

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 365.2 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 80-R4						
NET SALVAGE PERCENT: 0						
1935	4.56	4	4	1		
1936	63.08	59	62	1		
1937	29.31	27	28	1		
1938	141.47	130	137	4	4.00	1
1939	12.29	11	12			
1940	39.64	36	38	2		
1941	515.85	468	492	24	8.00	3
1942	177.00	160	168	9	9.00	1
1943	740.23	668	702	38	9.50	4
1944	35.87	32	34	2		
1945	12.36	11	12			
1946	278.02	246	258	20	10.00	2
1947	22.66	20	21	2		
1948	605.92	529	556	50	12.50	4
1949	52.55	46	48	5		
1950	265.39	230	242	23	11.50	2
1951	121.77	104	109	13	13.00	1
1952	189.85	162	170	20	10.00	2
1953	411.89	349	367	45	15.00	3
1954	436.60	365	383	54	13.50	4
1955	580.05	482	506	74	14.80	5
1956	14,442.82	11,847	12,446	1,997	15.60	128
1957	6,803.11	5,551	5,831	972	15.93	61
1958	32.32	26	27	5		
1959	694.53	555	583	112	16.00	7
1960	268.00	211	222	46	15.33	3
1961	5,284.92	4,137	4,346	939	18.41	51
1962	1,110.37	856	899	211	19.18	11
1963	1,715.31	1,313	1,379	336	19.76	17
1964	2,300.08	1,734	1,822	478	20.78	23
1965	20,031.18	14,983	15,740	4,291	21.03	204
1966	7,041.87	5,183	5,445	1,597	21.88	73
1967	17,967.89	13,117	13,780	4,188	22.28	188
1968	1,017.10	730	767	250	22.73	11
1969	5,072.26	3,610	3,792	1,280	23.70	54
1970	146.81	103	108	39	19.50	2
1971	8,611.44	5,967	6,268	2,343	24.93	94
1972	771.67	525	552	220	27.50	8
1973	1,191.45	803	844	347	26.69	13
1974	2,686.83	1,777	1,867	820	27.33	30
1975	2,602.66	1,703	1,789	814	28.07	29
1976	68.24	44	46	22	22.00	1
1977	2,628.72	1,654	1,738	891	29.70	30
1978	9,763.04	6,069	6,376	3,387	29.97	113
1979	2,311.33	1,408	1,479	832	30.81	27
1980	6,670.51	3,978	4,179	2,492	31.95	78
1981	22,122.02	13,017	13,675	8,447	32.36	261
1982	7,982.39	4,595	4,827	3,155	33.56	94
1983	5,114.64	2,880	3,026	2,089	34.25	61
1984	19,024.77	10,553	11,086	7,939	34.82	228
1985	3,069.10	1,663	1,747	1,322	35.73	37
1986	18,661.02	9,874	10,373	8,288	36.84	225
1987	27,765.69	14,446	15,176	12,590	37.14	339

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 365.2 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 80-R4						
NET SALVAGE PERCENT: 0						
1988	167,771.77	85,127	89,428	78,344	38.20	2,051
1989	4,447.11	2,199	2,310	2,137	38.85	55
1990	33,993.40	16,371	17,198	16,795	40.18	418
1991	124,752.44	58,921	61,898	62,854	40.58	1,549
1992	31,914.03	14,658	15,399	16,515	41.60	397
1993	39,901.63	17,808	18,708	21,194	42.56	498
1994	2,715.63	1,177	1,236	1,480	43.53	34
1995	14,905.80	6,265	6,582	8,324	44.51	187
1996	18,156.94	7,453	7,830	10,327	45.10	229
1997	34,976.61	13,900	14,602	20,375	45.99	443
1998	4,188.03	1,609	1,690	2,498	47.13	53
1999	104,550.98	38,809	40,770	63,781	47.99	1,329
2000	724.84	260	273	452	50.22	9
2001	12,901.84	4,451	4,676	8,226	49.85	165
2002	26,429.65	8,772	9,215	17,215	50.93	338
2003	55,552.03	17,843	18,745	36,807	51.41	716
2004	8,188.72	2,522	2,649	5,540	52.26	106
2005	1,672.35	493	518	1,154	52.45	22
2006	1,920.17	541	568	1,352	54.08	25
2007	69,679.06	18,702	19,647	50,032	55.41	903
2008	3,430.88	876	920	2,511	55.80	45
2009	138,436.29	33,502	35,195	103,241	57.42	1,798
2010	37,280.39	8,530	8,961	28,319	58.39	485
2011	21,229.54	4,577	4,808	16,422	59.50	276
2012	13,181.16	2,668	2,803	10,378	60.34	172
2013	30,475.98	5,766	6,057	24,419	61.35	398
2014	117,051.81	20,601	21,642	95,410	62.40	1,529
2015	26,202.69	4,266	4,482	21,721	63.51	342
2016	196,975.66	29,684	31,184	165,792	63.86	2,596
2017	14,626.57	2,010	2,112	12,515	64.84	193
2018	7,387.85	917	963	6,425	65.56	98
2019	351,577.89	38,955	40,923	310,655	66.87	4,646
2020	106,189.96	10,354	10,877	95,313	67.84	1,405
2021	184,266.09	15,515	16,299	167,967	68.87	2,439
2022	11,207.38	795	835	10,372	70.08	148
2023	20,574.12	1,185	1,245	19,329	70.80	273
2024	10,338.65	458	481	9,858	71.96	137
2025	135,007.81	4,185	4,396	130,612	72.85	1,793
2026	404,831.38	7,166	7,528	397,303	73.86	5,379
2027	543,479.61	6,033	6,338	537,142	74.34	7,225
	3,362,805.19	664,975	698,575	2,664,230		43,437

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 61.30 1.29

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 366.2 MEASURING AND REGULATING STATION STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 60-R2						
NET SALVAGE PERCENT: 0						
1916	512.21	512	512			
1919	222.30	222	222			
1920	129.44	128	123	6	1.50	4
1922	38.06	38	38			
1925	1,003.34	986	946	57	1.84	31
1926	449.04	437	419	30	2.73	11
1931	294.67	284	272	23	3.83	6
1933	326.64	311	298	29	4.83	6
1934	571.39	544	522	49	4.90	10
1935	1,303.77	1,240	1,189	115	4.79	24
1936	655.53	617	592	64	5.82	11
1937	459.76	432	414	46	5.75	8
1938	291.53	273	262	30	6.00	5
1940	262.16	245	235	27	6.75	4
1941	32.98	31	30	3		
1942	44.48	41	39	5	5.00	1
1945	62.49	57	55	7	7.00	1
1946	325.05	296	284	41	8.20	5
1948	382.96	346	332	51	8.50	6
1949	389.67	351	337	53	8.83	6
1950	375.23	337	323	52	8.67	6
1951	221.72	198	190	32	8.00	4
1952	1,438.09	1,278	1,226	212	9.22	23
1953	243.21	213	204	39	9.75	4
1954	4,294.33	3,748	3,595	699	10.75	65
1955	1,425.33	1,237	1,186	239	10.86	22
1956	7,947.83	6,860	6,579	1,369	11.31	121
1957	5,073.31	4,353	4,175	898	11.66	77
1958	2,682.42	2,288	2,194	488	11.90	41
1959	1,183.70	1,003	962	222	12.33	18
1960	4,832.87	4,068	3,901	932	12.59	74
1962	4,094.92	3,425	3,285	810	12.86	63
1963	1,615.28	1,341	1,286	329	13.16	25
1965	10,032.76	8,193	7,858	2,175	14.03	155
1966	9,107.59	7,374	7,072	2,036	14.44	141
1967	6,644.34	5,331	5,113	1,531	14.86	103
1970	1,168.15	911	874	294	16.33	18
1971	2,069.69	1,597	1,532	538	16.81	32
1972	4,222.80	3,225	3,093	1,130	17.12	66
1973	1,970.20	1,488	1,427	543	17.52	31
1974	606.45	453	434	172	17.20	10
1976	1,562.25	1,139	1,092	470	18.80	25
1977	4,882.60	3,539	3,394	1,489	19.09	78
1984	4,843.69	3,169	3,039	1,805	22.85	79
1985	4,840.39	3,115	2,988	1,852	23.44	79
1986	795.37	506	485	310	23.85	13
1987	1,455.10	910	873	582	24.25	24
1988	30,722.64	18,851	18,080	12,643	24.79	510
1991	10,555.76	6,098	5,848	4,708	26.60	177
1999	9,194.40	4,402	4,222	4,972	30.88	161
2000	1,299.78	604	579	721	31.35	23
2003	344.16	146	140	204	34.00	6
2006	2,297.72	872	836	1,462	34.81	42

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 366.2 MEASURING AND REGULATING STATION STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 60-R2						
NET SALVAGE PERCENT: 0						
2012	9,954.54	2,854	2,737	7,218	38.19	189
2013	14,875.03	4,030	3,865	11,010	38.63	285
2014	2,900.66	739	709	2,192	39.14	56
2015	13,487.27	3,210	3,079	10,408	39.42	264
2016	7,694.80	1,701	1,631	6,064	39.89	152
2017	5,132.08	1,045	1,002	4,130	40.49	102
2019	4,166.74	698	670	3,497	41.63	84
2021	2,177.94	286	274	1,904	42.31	45
2026	36,997.20	1,158	1,111	35,886	41.20	871
2027	49,730.16	1,005	964	48,766	40.34	1,209
	298,917.97	126,389	121,248	177,670		5,712

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 31.10 1.91

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 366.3 OTHER STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 60-R2						
NET SALVAGE PERCENT: 0						
1916	12.82	13	13			
1931	32.47	31	32			
1933	241.90	230	242			
1937	118.94	112	119			
1947	186.32	169	186			
1949	173.46	156	173			
1955	569.52	494	570			
1965	829.66	678	827	3		
1979	1,520.48	1,073	1,309	211	21.10	10
2026	1,321.27	41	50	1,271	41.00	31
2027	1,776.08	36	44	1,732	40.28	43
	6,782.92	3,033	3,565	3,218		84

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 38.30 1.24

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 367.1 MAINS - EXCLUDING CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-R2						
NET SALVAGE PERCENT: 0						
1928	4,402.65	4,067	4,353	50	8.33	6
1929	1,334.15	1,233	1,320	14	7.00	2
1930	10.64	10	11			
1931	10,225.64	9,359	10,017	209	9.09	23
1932	2,705.68	2,476	2,650	56	9.33	6
1933	54.95	50	54	1		
1934	1,490.51	1,349	1,444	47	9.40	5
1935	2,631.11	2,381	2,548	83	9.22	9
1936	13,169.91	11,788	12,616	554	10.65	52
1937	1,738.91	1,555	1,664	75	10.71	7
1938	207.36	185	198	9	9.00	1
1939	45.23	40	43	2		
1940	103.66	91	97	7	7.00	1
1941	1,822.69	1,605	1,718	105	11.67	9
1942	80.07	70	75	5		
1943	78,575.87	68,251	73,048	5,528	12.77	433
1944	67.15	58	62	5		
1945	107.78	93	100	8	8.00	1
1947	56,866.37	48,422	51,825	5,041	14.00	360
1948	4,106.93	3,486	3,731	376	13.93	27
1949	303.05	256	274	29	14.50	2
1950	9.60	8	9	1		
1951	206.65	172	184	23	23.00	1
1952	11,137.16	9,229	9,878	1,259	15.54	81
1953	268,335.73	221,404	236,965	31,371	15.76	1,991
1954	48,855.43	40,125	42,945	5,910	15.97	370
1955	213,723.74	173,138	185,306	28,418	16.96	1,676
1956	528,018.60	425,636	455,550	72,469	17.16	4,223
1957	89,344.38	71,636	76,671	12,673	17.38	729
1958	6,283.97	5,010	5,362	922	17.73	52
1959	128,587.57	101,044	108,146	20,442	18.63	1,097
1960	12,982.57	10,141	10,854	2,129	18.84	113
1961	116,458.42	90,383	96,735	19,723	19.15	1,030
1962	436.19	336	360	76	19.00	4
1963	123,911.14	94,866	101,533	22,378	19.70	1,136
1964	178,047.56	134,194	143,625	34,423	20.70	1,663
1965	507,542.66	379,642	406,324	101,219	21.00	4,820
1966	164,628.43	122,171	130,757	33,871	21.32	1,589
1967	573,214.80	421,943	451,598	121,617	21.63	5,623
1968	46,888.57	34,219	36,624	10,265	21.98	467
1969	189,041.67	135,637	145,170	43,872	22.97	1,910
1970	78,299.71	55,663	59,575	18,725	23.32	803
1971	12,899.05	9,084	9,722	3,177	23.71	134
1972	161,625.68	112,685	120,605	41,021	24.03	1,707
1973	574,979.63	396,736	424,619	150,361	24.41	6,160
1974	3,475.90	2,354	2,519	957	25.18	38
1975	137,014.61	91,786	98,237	38,778	25.78	1,504
1976	141,466.22	93,679	100,263	41,203	26.19	1,573
1977	179,261.13	117,291	125,534	53,727	26.58	2,021
1978	5,536.16	3,578	3,829	1,707	27.10	63
1979	41,880.24	26,720	28,598	13,282	27.44	484
1980	73,659.26	46,022	49,257	24,402	28.41	859
1981	213,043.32	131,277	140,503	72,540	28.85	2,514

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 367.1 MAINS - EXCLUDING CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-R2						
NET SALVAGE PERCENT: 0						
1982	173,139.71	105,182	112,574	60,566	29.29	2,068
1983	576,476.52	345,021	369,270	207,207	29.74	6,967
1984	287,755.21	169,574	181,492	106,263	30.20	3,519
1985	572,994.77	332,337	355,694	217,301	30.66	7,087
1986	606,168.59	343,273	367,399	238,770	31.66	7,542
1987	684,356.77	380,913	407,684	276,673	32.13	8,611
1988	3,616,083.87	1,976,913	2,115,854	1,500,230	32.61	46,005
1989	2,523,559.57	1,354,394	1,449,584	1,073,976	33.09	32,456
1990	2,804,409.79	1,476,241	1,579,994	1,224,416	33.59	36,452
1991	1,271,473.11	655,953	702,055	569,418	34.09	16,703
1992	1,719,374.30	868,800	929,861	789,513	34.59	22,825
1993	427,889.25	211,548	226,416	201,473	35.11	5,738
1994	654,301.89	316,224	338,449	315,853	35.63	8,865
1995	297,366.41	139,405	149,203	148,163	36.63	4,045
1996	545,432.04	249,535	267,073	278,359	37.16	7,491
1997	266,975.51	119,044	127,411	139,565	37.69	3,703
1998	490,586.51	212,964	227,932	262,655	38.24	6,869
1999	356,117.82	150,353	160,920	195,198	38.78	5,033
2001	70,507.84	28,034	30,004	40,504	39.91	1,015
2002	167,539.44	64,519	69,054	98,485	40.45	2,435
2003	118,865.46	44,254	47,364	71,501	41.02	1,743
2004	269,948.36	96,992	103,809	166,139	41.60	3,994
2005	85,014.24	29,432	31,501	53,513	42.17	1,269
2006	164,339.60	55,037	58,905	105,435	42.36	2,489
2007	1,349,115.41	433,471	463,936	885,179	42.96	20,605
2008	184,423.67	56,692	60,676	123,748	43.56	2,841
2009	238,449.02	69,937	74,852	163,597	44.17	3,704
2010	178,224.02	49,742	53,238	124,986	44.78	2,791
2011	516,924.36	137,605	147,276	369,648	45.02	8,211
2012	494,938.08	124,477	133,225	361,713	45.64	7,925
2013	381,111.37	90,133	96,468	284,643	46.27	6,152
2014	2,372,372.99	528,327	565,459	1,806,914	46.54	38,825
2015	1,625,465.74	336,797	360,468	1,264,998	47.19	26,806
2016	664,462.57	128,042	137,041	527,422	47.49	11,106
2017	2,646,268.50	467,596	500,460	2,145,808	48.15	44,565
2018	2,220,618.64	358,630	383,835	1,836,784	48.47	37,895
2019	8,542,394.60	1,245,481	1,333,016	7,209,379	48.81	147,703
2020	2,795,040.07	362,796	388,294	2,406,746	49.16	48,957
2021	5,402,354.02	615,868	659,152	4,743,202	49.22	96,367
2022	927,553.90	90,065	96,395	831,159	49.61	16,754
2024	6,891,853.33	436,254	466,915	6,424,938	49.30	130,323
2025	380,668.71	17,320	18,537	362,132	48.95	7,398
2026	10,332,054.16	279,999	299,678	10,032,376	47.93	209,313
2027	13,893,896.41	243,143	260,231	13,633,665	46.79	291,380
	85,799,712.21	19,512,951	20,884,359	64,915,353		1,451,924

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 44.70 1.69

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 367.2 MAINS - CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 27-S2.5						
NET SALVAGE PERCENT: 0						
1965	203.60	204	204			
1966	907.53	908	908			
1968	4,225.88	4,226	4,226			
1969	1,149.32	1,149	1,149			
1973	914.71	915	915			
1975	50,558.63	50,559	50,559			
1976	1,305.65	1,300	1,306			
1977	10,987.59	10,895	10,988			
1981	2,457.67	2,391	2,458			
1983	69,933.51	67,276	69,934			
1984	7,986.71	7,649	7,952	35	1.94	18
1985	83,970.56	79,982	83,147	824	2.11	391
1986	549.64	523	544	6	2.00	3
1987	5,964.88	5,630	5,853	112	2.38	47
1988	54,349.50	50,877	52,890	1,460	2.68	545
1989	901.51	840	873	29	2.90	10
1992	1,381.39	1,259	1,309	72	3.43	21
1993	5,009.29	4,540	4,720	289	3.57	81
1996	4,479.19	3,944	4,100	379	4.26	89
1998	452,481.63	388,908	404,299	48,183	4.80	10,038
1999	168,181.52	142,483	148,122	20,060	5.11	3,926
2001	399,596.75	328,309	341,301	58,296	5.72	10,192
2003	139,079.13	109,984	114,336	24,743	6.44	3,842
2004	310,104.39	239,494	248,972	61,132	6.88	8,885
2005	107,184.75	80,914	84,116	23,069	7.25	3,182
2006	47,760.50	35,051	36,438	11,322	7.74	1,463
2011	120,291.53	73,486	76,394	43,898	10.40	4,221
2013	46,136.00	25,393	26,398	19,738	11.71	1,686
2014	44,611.58	23,140	24,056	20,556	12.37	1,662
2015	269,262.80	130,512	135,677	133,586	13.11	10,190
2016	10,384.13	4,660	4,844	5,540	13.92	398
2017	2,881.05	1,188	1,235	1,646	14.70	112
2018	196,806.20	73,842	76,764	120,042	15.54	7,725
2019	33,452.06	11,263	11,709	21,743	16.42	1,324
2020	249,508.87	74,104	77,037	172,472	17.36	9,935
2021	209,968.12	54,130	56,272	153,696	18.24	8,426
2022	310,524.75	67,570	70,244	240,281	19.18	12,528
2023	209,136.39	36,975	38,438	170,698	20.18	8,459
2024	11,262.49	1,535	1,596	9,666	21.10	458
2025	28,369.47	2,706	2,813	25,556	22.13	1,155
2026	1,149,950.89	62,672	65,152	1,084,799	23.12	46,920
2027	1,543,766.27	52,642	54,725	1,489,041	23.62	63,042
	6,367,938.03	2,316,028	2,404,973	3,962,965		220,974

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 17.90 3.47

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 369 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
1980 AND PRIOR						
SURVIVOR CURVE: IOWA 30-R0.5						
NET SALVAGE PERCENT: 0						
1964	1,073.45	1,073	1,073			
1965	16,449.27	16,449	16,449			
1966	4,277.70	4,278	4,278			
1967	18,700.38	18,700	18,700			
1968	14,021.37	13,867	14,021			
1969	6,208.35	6,039	6,208			
1970	6,139.26	5,873	6,139			
1971	2,009.14	1,891	2,009			
1972	5,924.17	5,484	5,924			
1973	28,249.91	25,726	28,250			
1974	10,944.61	9,806	10,945			
1975	10,865.27	9,583	10,865			
1976	18,129.74	15,737	18,130			
1977	20,618.71	17,615	20,619			
1978	25,198.04	21,192	25,198			
1979	13,933.46	11,532	13,933			
1980	12,977.41	10,568	12,977			
	215,720.24	195,413	215,720			
1981 AND SUBSEQUENT						
SURVIVOR CURVE: IOWA 40-R1.5						
NET SALVAGE PERCENT: 0						
1981	16,448.72	12,279	16,449			
1982	21,162.36	15,586	21,162			
1983	47,528.81	34,518	47,529			
1984	38,820.07	27,785	38,820			
1985	40,830.03	28,785	40,830			
1986	269,975.21	187,363	269,370	605	12.35	49
1987	105,483.05	71,992	103,502	1,981	12.70	156
1988	425,674.30	285,521	410,491	15,183	13.17	1,153
1989	304,485.41	200,504	288,263	16,223	13.66	1,188
1990	176,298.13	113,889	163,737	12,561	14.16	887
1991	102,363.33	64,822	93,194	9,169	14.67	625
1992	126,090.58	78,208	112,439	13,652	15.19	899
1993	274,707.82	166,679	239,633	35,075	15.73	2,230
1994	118,794.99	70,445	101,278	17,517	16.28	1,076
1995	461,018.48	266,930	383,763	77,256	16.84	4,588
1996	60,759.01	34,298	49,310	11,449	17.43	657
1997	149,591.88	82,276	118,287	31,304	18.00	1,739
1998	109,029.39	58,331	83,862	25,167	18.60	1,353
1999	133,264.58	69,264	99,580	33,684	19.22	1,753
2000	7,378.12	3,720	5,348	2,030	19.90	102
2001	163,502.53	79,871	114,830	48,673	20.46	2,379
2002	126,022.56	59,546	85,609	40,414	21.10	1,915
2003	15,216.95	6,943	9,982	5,235	21.72	241
2004	12,660.85	5,564	7,999	4,662	22.41	208
2005	13,022.33	5,505	7,914	5,108	23.11	221
2006	7,004.83	2,842	4,086	2,919	23.73	123
2007	57,934.59	22,508	32,360	25,575	24.45	1,046
2008	56,418.44	20,931	30,092	26,326	25.17	1,046

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 369 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
1981 AND SUBSEQUENT						
SURVIVOR CURVE: IOWA 40-R1.5						
NET SALVAGE PERCENT: 0						
2009	130,735.66	46,182	66,395	64,340	25.87	2,487
2010	189,748.68	63,661	91,525	98,224	26.58	3,695
2011	103,115.30	32,739	47,069	56,047	27.30	2,053
2012	41,306.92	12,361	17,771	23,536	28.02	840
2013	868,109.14	243,722	350,397	517,712	28.77	17,995
2014	34,895.01	9,151	13,156	21,739	29.50	737
2015	444,831.12	108,316	155,725	289,106	30.26	9,554
2016	331,120.21	74,336	106,872	224,248	31.02	7,229
2017	59,839.24	12,297	17,679	42,160	31.77	1,327
2018	118,454.52	22,062	31,718	86,736	32.55	2,665
2019	44,313.11	7,400	10,639	33,674	33.31	1,011
2020	572,240.83	84,406	121,350	450,891	34.10	13,223
2021	407,498.59	52,058	74,843	332,655	34.89	9,534
2022	223,607.12	24,150	34,720	188,887	35.68	5,294
2023	20,757.71	1,827	2,627	18,131	36.48	497
2024	11,861.10	807	1,160	10,701	37.29	287
2025	148,855.87	7,108	10,219	138,637	38.09	3,640
2026	1,281,902.92	35,252	50,681	1,231,221	38.90	31,651
2027	1,724,570.92	29,749	42,770	1,681,801	39.31	42,783
	10,199,251.32	2,944,489	4,227,037	5,972,214		182,136
	10,414,971.56	3,139,902	4,442,757	5,972,214		182,136

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 32.80 1.75

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 374.2 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 80-R4						
NET SALVAGE PERCENT: 0						
1941	58.38	53	53	5	5.00	1
1942	75.82	69	70	6	6.00	1
1943	69.09	62	62	7	7.00	1
1944	130.20	116	117	13	13.00	1
1945	147.25	131	132	15	15.00	1
1946	336.06	298	300	36	12.00	3
1947	750.05	663	668	82	10.25	8
1948	829.41	724	729	100	11.11	9
1949	2,712.74	2,359	2,377	336	11.59	29
1950	2,722.64	2,358	2,376	347	11.97	29
1951	2,246.76	1,921	1,936	311	12.96	24
1952	1,819.12	1,549	1,561	258	12.90	20
1953	2,479.68	2,101	2,117	363	13.44	27
1954	2,229.05	1,863	1,877	352	14.67	24
1955	13,853.28	11,523	11,610	2,243	14.66	153
1956	14,505.26	11,899	11,989	2,516	15.63	161
1957	11,378.78	9,284	9,354	2,025	15.82	128
1958	11,685.62	9,399	9,470	2,216	16.92	131
1959	8,277.99	6,618	6,668	1,610	17.13	94
1960	10,919.81	8,603	8,668	2,252	18.16	124
1961	13,701.60	10,724	10,805	2,897	18.45	157
1962	15,789.10	12,172	12,264	3,525	19.37	182
1963	11,160.98	8,545	8,610	2,551	19.78	129
1964	12,601.84	9,498	9,570	3,032	20.77	146
1965	15,505.80	11,598	11,686	3,820	20.99	182
1966	17,683.23	13,015	13,114	4,569	21.97	208
1967	18,432.70	13,456	13,558	4,875	22.26	219
1968	26,381.54	18,939	19,082	7,300	23.32	313
1969	12,857.14	9,150	9,219	3,638	23.62	154
1970	19,540.91	13,669	13,773	5,768	24.65	234
1971	37,132.72	25,729	25,924	11,209	24.96	449
1972	12,182.53	8,291	8,354	3,829	26.05	147
1973	24,484.27	16,495	16,620	7,864	26.30	299
1974	11,439.60	7,565	7,622	3,818	27.27	140
1975	5,589.28	3,657	3,685	1,904	27.59	69
1976	10,452.88	6,708	6,759	3,694	28.64	129
1977	12,916.57	8,127	8,189	4,728	29.74	159
1978	29,121.03	18,102	18,239	10,882	30.06	362
1979	36,602.69	22,291	22,460	14,143	31.02	456
1980	43,595.56	26,000	26,197	17,399	32.04	543
1981	64,650.28	38,040	38,328	26,322	32.42	812
1982	47,436.50	27,309	27,516	19,920	33.42	596
1983	58,246.88	32,793	33,041	25,206	34.39	733
1984	55,144.52	30,589	30,821	24,324	34.80	699
1985	107,707.68	58,367	58,809	48,899	35.80	1,366
1986	82,117.47	43,448	43,777	38,340	36.79	1,042
1987	113,482.39	59,045	59,492	53,990	37.18	1,452
1988	126,990.04	64,435	64,923	62,067	38.20	1,625
1989	138,624.14	68,550	69,069	69,555	39.19	1,775
1990	196,084.76	94,434	95,149	100,936	40.20	2,511
1991	189,266.60	89,391	90,068	99,199	40.59	2,444
1992	151,397.38	69,537	70,064	81,333	41.58	1,956
1993	205,274.55	91,614	92,308	112,967	42.60	2,652

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 374.2 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 80-R4						
NET SALVAGE PERCENT: 0						
1994	211,386.03	91,594	92,288	119,098	43.59	2,732
1995	199,699.21	83,934	84,570	115,129	44.59	2,582
1996	241,443.25	99,112	99,863	141,580	45.00	3,146
1997	252,149.23	100,204	100,963	151,186	46.00	3,287
1998	191,075.39	73,430	73,986	117,089	47.00	2,491
1999	208,083.56	77,241	77,826	130,258	47.99	2,714
2000	218,425.37	78,218	78,811	139,614	49.00	2,849
2001	275,153.66	94,928	95,647	179,507	50.00	3,590
2002	180,866.58	60,030	60,485	120,382	51.01	2,360
2003	211,874.52	68,054	68,569	143,306	51.42	2,787
2004	293,638.01	90,441	91,126	202,512	52.42	3,863
2005	281,715.38	83,050	83,679	198,036	53.42	3,707
2006	212,614.36	59,872	60,326	152,288	54.43	2,798
2007	276,700.08	74,266	74,829	201,871	55.41	3,643
2008	260,681.08	66,526	67,030	193,651	56.43	3,432
2009	223,378.59	54,058	54,467	168,912	57.41	2,942
2010	269,371.54	61,632	62,099	207,273	58.42	3,548
2011	303,757.20	65,490	65,986	237,771	59.41	4,002
2012	275,955.02	55,853	56,276	219,679	60.42	3,636
2013	329,948.44	62,426	62,899	267,049	61.42	4,348
2014	431,102.07	75,874	76,449	354,653	62.42	5,682
2015	466,395.66	75,929	76,504	389,892	63.42	6,148
2016	452,791.43	68,236	68,753	384,038	63.86	6,014
2017	464,900.34	63,877	64,361	400,539	64.86	6,175
2018	518,817.05	64,385	64,873	453,944	65.86	6,893
2019	1,176,798.11	130,389	131,376	1,045,422	66.86	15,636
2020	657,517.08	64,108	64,594	592,923	67.86	8,737
2021	573,889.42	48,321	48,687	525,202	68.86	7,627
2022	671,409.57	47,603	47,963	623,447	69.86	8,924
2023	608,561.75	35,053	35,318	573,244	70.86	8,090
2024	746,458.88	33,068	33,319	713,140	71.86	9,924
2025	1,246,639.71	38,646	38,939	1,207,701	72.86	16,576
2026	997,163.13	17,650	17,783	979,380	73.86	13,260
2027	1,149,531.23	12,760	12,857	1,136,674	74.35	15,288
	17,090,714.08	3,379,134	3,404,730	13,685,984		224,740

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 60.90 1.31

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 375.3 STRUCTURES AND IMPROVEMENTS - LARGE
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
ELK SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2040						
NET SALVAGE PERCENT: 0						
1970	101,615.79	80,480	91,408	10,208	10.92	935
1972	872.15	687	780	92	11.50	8
1975	397.62	310	352	46	11.50	4
1980	5,938.40	4,549	5,167	772	11.19	69
1981	866.58	661	751	116	11.60	10
1988	944.53	697	792	153	11.77	13
1990	7,780.00	5,671	6,441	1,339	11.54	116
1992	7,147.93	5,143	5,841	1,307	11.57	113
1993	12,411.95	8,866	10,070	2,342	11.59	202
1996	2,932.90	2,046	2,324	609	11.71	52
1997	91,997.01	63,629	72,269	19,728	11.69	1,688
1999	81.08	55	62	19	9.50	2
2000	6,956.95	4,669	5,303	1,654	11.73	141
2004	3,780.97	2,414	2,742	1,039	11.81	88
2005	80,474.20	50,626	57,500	22,974	11.88	1,934
2006	3,790.93	2,347	2,666	1,125	11.84	95
2008	8,450.00	5,045	5,730	2,720	11.93	228
2010	31,121.00	17,793	20,209	10,912	12.00	909
2011	12,389.14	6,912	7,851	4,539	12.01	378
2014	33,265.48	16,950	19,252	14,014	12.09	1,159
2015	10,797.30	5,299	6,019	4,779	12.10	395
2016	4,733.61	2,225	2,527	2,206	12.12	182
2017	10,408.19	4,663	5,296	5,112	12.17	420
2018	13,025.65	5,511	6,259	6,766	12.19	555
2019	6,242.90	2,474	2,810	3,433	12.22	281
2024	38,929.18	8,144	9,250	29,679	12.36	2,401
2025	95,168.56	14,901	16,924	78,244	12.39	6,315
	592,520.00	322,767	366,594	225,926		18,693
DUBOIS SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2037						
NET SALVAGE PERCENT: 0						
1967	80,715.66	67,524	76,693	4,023	8.58	469
1969	27.09	23	26	1		
1976	1,655.47	1,357	1,541	114	8.77	13
1978	6,016.00	4,902	5,568	448	8.78	51
1980	2,081.36	1,686	1,915	166	8.74	19
1984	1,452.26	1,160	1,318	135	9.00	15
1986	1,466.30	1,162	1,320	147	9.19	16
1991	5,628.85	4,358	4,950	679	9.05	75
1993	19,099.51	14,621	16,606	2,493	9.07	275
1996	4,082.54	3,066	3,482	600	9.09	66
1997	13,613.93	10,149	11,527	2,087	9.11	229
1999	81.07	59	67	14	7.00	2
2000	20,579.25	14,968	17,000	3,579	9.15	391
2002	26,356.07	18,802	21,355	5,001	9.18	545
2003	21,650.94	15,284	17,359	4,292	9.19	467
2005	775.00	534	607	168	9.33	18

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 375.3 STRUCTURES AND IMPROVEMENTS - LARGE
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
DUBOIS SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2037						
NET SALVAGE PERCENT: 0						
2008	5,099.64	3,363	3,820	1,280	9.28	138
2012	2,022.28	1,231	1,398	624	9.31	67
2013	12,349.08	7,320	8,314	4,035	9.34	432
2014	39,062.33	22,501	25,556	13,506	9.34	1,446
2016	20,527.11	11,024	12,521	8,006	9.37	854
2018	9,545.21	4,674	5,309	4,237	9.39	451
2019	3,427.78	1,583	1,798	1,630	9.42	173
2020	79,894.36	34,426	39,101	40,794	9.43	4,326
2021	5,966.32	2,359	2,679	3,287	9.45	348
2022	5,191.35	1,845	2,096	3,096	9.47	327
2024	15,105.99	3,886	4,414	10,692	9.50	1,125
2025	53,102.95	10,369	11,777	41,326	9.52	4,341
	456,575.70	264,236	300,116	156,460		16,679
MEADVILLE SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2037						
NET SALVAGE PERCENT: 0						
1962	50,342.77	42,506	48,278	2,065	8.46	244
1963	12,243.25	10,318	11,719	524	8.45	62
1974	940.15	774	879	61	8.71	7
1980	4,336.66	3,513	3,990	347	8.90	39
1984	3,117.80	2,491	2,829	289	9.03	32
1988	6,098.81	4,791	5,442	657	9.00	73
1989	2,400.00	1,877	2,132	268	8.93	30
1991	5,750.00	4,451	5,055	695	9.03	77
1993	6,060.92	4,640	5,270	791	9.09	87
1994	5,353.23	4,074	4,627	726	9.08	80
1998	34,149.82	25,266	28,697	5,453	9.12	598
1999	241.07	177	201	40	10.00	4
2000	59,583.52	43,338	49,223	10,361	9.15	1,132
2001	33,076.87	23,839	27,076	6,001	9.16	655
2006	9,202.23	6,257	7,107	2,096	9.23	227
2007	3,050.00	2,044	2,322	728	9.22	79
2008	6,989.58	4,609	5,235	1,755	9.24	190
2009	23,307.80	15,108	17,159	6,148	9.27	663
2010	4,428.08	2,816	3,198	1,230	9.32	132
2012	9,796.54	5,961	6,770	3,026	9.31	325
2013	24,548.17	14,551	16,527	8,021	9.33	860
2014	7,006.38	4,036	4,584	2,422	9.35	259
2016	8,839.99	4,748	5,393	3,447	9.37	368
2017	1,335.56	687	780	555	9.41	59
2020	30,990.81	13,354	15,167	15,824	9.43	1,678
2022	62,682.13	22,273	25,297	37,385	9.47	3,948
2023	52,740.23	16,352	18,572	34,168	9.48	3,604
2024	135,063.19	34,742	39,459	95,604	9.50	10,064
2025	11,609.14	2,267	2,575	9,034	9.52	949
	615,284.70	321,860	365,564	249,721		26,525

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YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
CLARION SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2036						
NET SALVAGE PERCENT: 0						
1936	9,903.31	8,790	9,903			
1937	2,759.12	2,445	2,759			
1938	210.94	187	211			
1939	582.38	515	582			
1944	10.39	9	10			
1945	326.86	287	326	1		
1950	321.44	280	318	3		
1952	433.28	377	428	5	5.00	1
1953	332.05	288	327	5	5.00	1
1954	69.30	60	68	1		
1955	275.00	238	270	5	5.00	1
1962	856.57	734	834	22	7.33	3
1963	83.47	71	81	3		
1965	199.63	170	193	6	6.00	1
1966	177.21	151	172	6	6.00	1
1967	242.55	206	234	8	8.00	1
1968	1,416.69	1,203	1,367	50	8.33	6
1973	6,609.18	5,555	6,313	297	7.82	38
1975	530.69	444	505	26	8.67	3
1981	33,569.89	27,643	31,413	2,157	8.02	269
1982	22,711.57	18,646	21,189	1,523	8.02	190
1990	12,655.51	10,076	11,450	1,205	8.14	148
1993	9,346.08	7,332	8,332	1,014	8.18	124
1994	6,506.60	5,077	5,769	737	8.19	90
1996	1,000.00	771	876	124	8.27	15
2003	11,593.30	8,438	9,589	2,004	8.28	242
2005	13,549.81	9,646	10,962	2,588	8.32	311
2009	19,507.78	13,122	14,912	4,596	8.36	550
2012	1,698.49	1,076	1,223	476	8.35	57
2014	21,300.79	12,823	14,572	6,729	8.41	800
2017	3,843.90	2,081	2,365	1,479	8.45	175
2018	7,749.73	4,003	4,549	3,201	8.47	378
2019	12,074.65	5,903	6,708	5,367	8.47	634
2024	93,979.93	26,137	29,702	64,278	8.54	7,527
2025	36,556.02	7,802	8,866	27,690	8.55	3,239
	332,984.11	182,586	207,379	125,605		14,805
ERIE SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2035						
NET SALVAGE PERCENT: 0						
1947	236.25	209	236			
1957	134,862.55	118,256	134,314	549	6.78	81
1961	423.30	369	419	4	4.00	1
1962	148.51	129	147	2		
1966	201.20	174	198	4	4.00	1
1967	96.43	83	94	2		
1968	1,770.34	1,529	1,737	34	6.80	5
1969	500.00	431	490	10	10.00	1

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YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
ERIE SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2035						
NET SALVAGE PERCENT: 0						
1970	229.33	197	224	6	6.00	1
1971	7,042.51	6,051	6,873	170	7.08	24
1972	49,166.57	42,167	47,893	1,274	7.04	181
1973	9,678.83	8,284	9,409	270	7.11	38
1977	36,233.84	30,751	34,927	1,307	7.10	184
1978	16,827.85	14,249	16,184	644	7.16	90
1979	3,123.32	2,638	2,996	127	7.06	18
1983	74,357.79	62,141	70,579	3,779	7.18	526
1984	9,992.53	8,326	9,457	536	7.15	75
1987	2,479.34	2,045	2,323	157	7.14	22
1989	15,219.64	12,461	14,153	1,067	7.26	147
1990	205,165.94	167,298	190,015	15,151	7.25	2,090
1991	14,509.49	11,781	13,381	1,129	7.24	156
1993	27,393.57	22,036	25,028	2,365	7.28	325
1994	3,511.43	2,810	3,192	320	7.27	44
1995	11,772.42	9,371	10,643	1,129	7.28	155
1996	24,450.85	19,353	21,981	2,470	7.31	338
1997	64,477.75	50,725	57,613	6,865	7.32	938
1998	113,089.84	88,390	100,392	12,698	7.33	1,732
1999	40,303.36	31,284	35,532	4,771	7.34	650
2000	16,952.86	13,068	14,842	2,110	7.35	287
2001	3,357.11	2,568	2,917	440	7.33	60
2002	8,675.02	6,579	7,472	1,203	7.38	163
2003	8,065.31	6,061	6,884	1,181	7.38	160
2005	4,994.72	3,677	4,176	818	7.37	111
2006	34,812.67	25,338	28,779	6,034	7.40	815
2009	1,558.62	1,089	1,237	322	7.49	43
2011	1,822.48	1,231	1,398	424	7.44	57
2012	2,076.71	1,374	1,561	516	7.48	69
2013	26,847.78	17,369	19,727	7,120	7.46	954
2016	1,690.00	1,003	1,139	551	7.45	74
2017	5,182.34	2,961	3,363	1,819	7.49	243
2018	15,476.18	8,462	9,611	5,865	7.51	781
2019	156,166.24	81,030	92,033	64,133	7.52	8,528
2020	122,230.35	59,576	67,666	54,565	7.53	7,246
2021	29,341.93	13,240	15,038	14,304	7.54	1,897
2022	754,627.80	309,171	351,152	403,476	7.55	53,441
2023	21,835.08	7,881	8,951	12,884	7.56	1,704
2024	86,268.78	26,190	29,746	56,523	7.57	7,467
2025	6,466.00	1,515	1,721	4,745	7.58	626
	2,175,712.76	1,302,921	1,479,839	695,874		92,549
ERIE OFFICE, THIRD AND WAYNE						
INTERIM SURVIVOR CURVE: IOWA 55-R1						
PROBABLE RETIREMENT DATE: 6-2035						
NET SALVAGE PERCENT: 0						
1959	372.70	327	371	1		
1960	58,379.33	51,085	58,022	358	6.51	55
1963	573.36	499	567	7	7.00	1
1964	584.46	508	577	7	7.00	1

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YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
ERIE OFFICE, THIRD AND WAYNE						
INTERIM SURVIVOR CURVE: IOWA 55-R1						
PROBABLE RETIREMENT DATE: 6-2035						
NET SALVAGE PERCENT: 0						
1965	1,099.46	954	1,084	16	8.00	2
1968	1,810.94	1,564	1,776	35	7.00	5
1969	236.69	204	232	5	5.00	1
1971	5,020.44	4,310	4,895	125	6.94	18
1972	2,216.50	1,899	2,157	60	6.67	9
1973	4,742.34	4,054	4,604	138	6.90	20
1977	2,599.42	2,202	2,501	98	7.00	14
1979	41,832.56	35,246	40,032	1,801	7.06	255
1989	3,077.49	2,507	2,847	230	7.19	32
1991	637.10	514	584	53	7.57	7
1998	89,155.57	69,198	78,594	10,561	7.34	1,439
1999	23,148.49	17,838	20,260	2,888	7.35	393
2000	100,803.24	77,085	87,552	13,251	7.36	1,800
2003	40,815.12	30,400	34,528	6,287	7.39	851
2004	3,527.42	2,601	2,954	573	7.44	77
2005	12,046.47	8,785	9,978	2,069	7.42	279
2006	1,767.35	1,274	1,447	320	7.44	43
2007	169,108.66	120,360	136,703	32,405	7.42	4,367
2008	41,571.07	29,172	33,133	8,438	7.43	1,136
2010	257,114.41	174,766	198,497	58,618	7.44	7,879
2012	7,009.51	4,584	5,206	1,803	7.45	242
2013	4,610.24	2,948	3,348	1,262	7.47	169
2014	2,090.99	1,303	1,480	611	7.45	82
2015	23,306.85	14,112	16,028	7,279	7.46	976
2017	11,248.95	6,344	7,205	4,044	7.48	541
2018	78,764.80	42,464	48,230	30,535	7.48	4,082
2019	9,009.06	4,610	5,236	3,773	7.49	504
2021	5,242.61	2,332	2,649	2,594	7.50	346
2022	4,695.34	1,892	2,149	2,546	7.51	339
2025	38,304.74	8,800	9,995	28,310	7.51	3,770
2026	209,229.88	30,671	34,836	174,394	7.51	23,222
	1,255,753.56	757,412	860,258	395,496		52,957
WARREN SERVICE CENTER - NEW						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2062						
NET SALVAGE PERCENT: 0						
2007	729,486.36	273,134	310,222	419,265	28.42	14,752
2009	1,196.30	421	478	718	28.72	25
2010	34,550.71	11,725	13,317	21,234	28.85	736
2011	2,487.21	813	923	1,564	28.96	54
2012	23,304.35	7,309	8,301	15,003	29.19	514
2014	7,496.69	2,138	2,428	5,068	29.47	172
2017	31,378.67	7,461	8,474	22,905	29.94	765
2018	1,669.50	368	418	1,252	29.81	42
2019	50,140.17	10,118	11,492	38,648	30.26	1,277
2020	258,032.22	47,073	53,465	204,567	30.43	6,723
2021	7,965.18	1,292	1,467	6,498	30.65	212
2023	10,265.18	1,206	1,370	8,895	30.99	287
2024	116,478.74	10,860	12,335	104,144	31.12	3,347

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YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
WARREN SERVICE CENTER - NEW						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2062						
NET SALVAGE PERCENT: 0						
2025	5,475.07	369	419	5,056	31.21	162
	1,279,926.35	374,287	425,110	854,816		29,068
CORRY SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2036						
NET SALVAGE PERCENT: 0						
1951	6,042.91	5,260	5,974	69	7.67	9
1952	977.14	849	964	13	6.50	2
1979	2,344.92	1,942	2,206	139	8.18	17
1980	1,853.96	1,531	1,739	115	8.21	14
1988	3,190.26	2,563	2,911	279	8.21	34
1991	9,266.32	7,344	8,341	925	8.19	113
1992	3,673.60	2,897	3,290	383	8.15	47
1993	18,851.76	14,789	16,797	2,055	8.15	252
2003	3,347.81	2,437	2,768	580	8.29	70
2008	2,582.69	1,765	2,005	578	8.38	69
2009	2,444.16	1,644	1,867	577	8.36	69
2011	6,920.00	4,484	5,093	1,827	8.38	218
2015	3,574.30	2,087	2,370	1,204	8.42	143
2016	3,648.86	2,058	2,337	1,311	8.40	156
2019	6,975.21	3,410	3,873	3,102	8.48	366
2021	120,860.50	50,928	57,843	63,017	8.50	7,414
2023	17,201.65	5,743	6,523	10,679	8.52	1,253
2025	36,607.74	7,813	8,874	27,734	8.55	3,244
	250,363.79	119,544	135,776	114,588		13,490
ERIE - WELD SHOP AND GARAGE						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2035						
NET SALVAGE PERCENT: 0						
1998	82,754.45	64,680	73,463	9,292	7.33	1,268
1999	95,760.31	74,331	84,424	11,336	7.34	1,544
	178,514.76	139,011	157,887	20,628		2,812
WEST COUNTY SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2039						
NET SALVAGE PERCENT: 0						
1979	365,183.70	285,873	324,690	40,493	10.44	3,879
1980	32,267.02	25,165	28,582	3,685	10.47	352
1991	3,689.19	2,730	3,101	588	10.69	55
1993	16,452.49	12,020	13,652	2,800	10.77	260
2001	7,885.74	5,374	6,104	1,782	10.93	163
2005	5,270.81	3,415	3,879	1,392	10.96	127

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YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
WEST COUNTY SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2039						
NET SALVAGE PERCENT: 0						
2006	20,460.40	13,058	14,831	5,629	11.02	511
2008	5,492.00	3,386	3,846	1,646	11.05	149
2011	1,277.81	739	839	438	11.23	39
2012	5,919.28	3,334	3,787	2,133	11.17	191
2014	10,459.00	5,542	6,295	4,164	11.19	372
2015	17,975.01	9,188	10,436	7,539	11.20	673
2016	1,789.73	877	996	794	11.18	71
2017	6,050.22	2,829	3,213	2,837	11.26	252
2019	4,234.70	1,761	2,000	2,235	11.29	198
2021	20,010.29	7,044	8,000	12,010	11.34	1,059
2022	85,317.66	26,826	30,469	54,849	11.36	4,828
2023	106,465.12	28,881	32,803	73,663	11.39	6,467
2024	30,143.19	6,730	7,644	22,499	11.41	1,972
2025	122,121.37	20,442	23,218	98,904	11.44	8,645
	868,464.73	465,214	528,383	340,082		30,263
OIL CITY - FRANKLIN SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2051						
NET SALVAGE PERCENT: 0						
1986	449,899.89	278,254	316,037	133,863	19.24	6,958
1995	104,880.66	59,284	67,334	37,547	19.99	1,878
1996	4,162.57	2,324	2,640	1,523	20.04	76
1999	320.04	171	194	126	21.00	6
2000	1,512.02	797	905	607	20.23	30
2002	746.01	380	432	314	20.93	15
2003	62,978.04	31,519	35,799	27,179	20.61	1,319
2004	16,494.01	8,093	9,192	7,302	20.69	353
2005	5,642.88	2,711	3,079	2,564	20.68	124
2007	6,932.59	3,179	3,611	3,322	20.89	159
2008	65,203.02	29,118	33,072	32,131	20.97	1,532
2010	4,684.12	1,973	2,241	2,443	21.06	116
2011	8,096.14	3,300	3,748	4,348	21.21	205
2012	187,783.92	73,807	83,829	103,955	21.28	4,885
2013	6,169.30	2,330	2,646	3,523	21.35	165
2014	27,684.27	10,006	11,365	16,320	21.42	762
2015	13,218.85	4,550	5,168	8,051	21.53	374
2016	30,985.81	10,100	11,471	19,514	21.59	904
2017	332,857.98	102,041	115,897	216,961	21.67	10,012
2018	5,054.65	1,445	1,641	3,413	21.74	157
2019	5,107.97	1,348	1,531	3,577	21.81	164
2020	80,644.35	19,350	21,977	58,667	21.92	2,676
2021	6,201.44	1,332	1,513	4,689	22.01	213
2022	162,888.39	30,553	34,702	128,187	22.09	5,803
2023	18,018.63	2,851	3,238	14,781	22.19	666
2024	20,528.10	2,607	2,961	17,567	22.26	789
2027	241,196.28	8,575	9,739	231,457	22.52	10,278
	1,869,891.93	691,998	785,962	1,083,930		50,619

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BRADFORD						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2055						
NET SALVAGE PERCENT: 0						
1995	583,613.88	309,350	351,355	232,259	22.59	10,281
1996	1,302.21	681	773	529	23.00	23
1997	4,035.13	2,080	2,362	1,673	22.92	73
1999	81.08	41	47	35	17.50	2
2003	11,324.03	5,258	5,972	5,352	23.37	229
2012	11,717.45	4,204	4,775	6,943	24.28	286
2013	14,910.71	5,132	5,829	9,082	24.41	372
2015	47,608.06	14,858	16,876	30,733	24.63	1,248
2016	17,575.36	5,183	5,887	11,689	24.71	473
2018	23,061.92	5,923	6,727	16,335	24.94	655
2019	71,098.72	16,821	19,105	51,994	25.05	2,076
2020	9,272.81	1,989	2,259	7,014	25.14	279
2023	7,668.78	1,076	1,222	6,447	25.48	253
	803,270.14	372,596	423,189	380,081		16,250
SHARON-GREENVILLE SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2056						
NET SALVAGE PERCENT: 0						
1996	792,576.02	408,074	463,485	329,091	23.32	14,112
1999	81.07	40	45	36	18.00	2
2002	6,431.49	2,995	3,402	3,030	24.05	126
2008	1,984.30	800	909	1,076	24.45	44
2009	43,014.78	16,824	19,108	23,906	24.72	967
2011	57,199.56	20,897	23,735	33,465	24.94	1,342
2014	47,182.84	15,161	17,220	29,963	25.26	1,186
2016	5,511.88	1,588	1,804	3,708	25.40	146
2017	17,423.98	4,706	5,345	12,079	25.59	472
2018	3,074.00	771	876	2,198	25.86	85
2020	154,470.03	32,307	36,694	117,776	25.94	4,540
2021	5,081.08	947	1,076	4,005	26.01	154
2022	1,366.85	222	252	1,115	25.93	43
2023	6,353.21	866	984	5,370	26.32	204
2025	54,510.16	4,290	4,873	49,638	26.57	1,868
	1,196,261.25	510,488	579,805	616,456		25,291
	11,875,523.79	5,824,920	6,615,862	5,259,663		390,001

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 13.50 3.28

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 375.4 STRUCTURES AND IMPROVEMENTS - SMALL
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
1951	963.25	920	963			
1952	3,656.30	3,451	3,656			
1953	1,599.06	1,490	1,599			
1954	5,898.74	5,430	5,899			
1955	7,631.75	6,941	7,632			
1956	15,392.15	13,830	15,392			
1957	2,990.56	2,655	2,991			
1958	3,343.08	2,933	3,343			
1959	6,037.61	5,235	5,974	63	5.25	12
1960	6,459.29	5,534	6,316	144	5.76	25
1961	2,288.36	1,937	2,211	78	6.00	13
1962	4,451.97	3,724	4,250	202	6.52	31
1963	4,699.01	3,884	4,433	266	7.00	38
1964	1,208.39	987	1,126	82	7.45	11
1965	17,748.80	14,319	16,341	1,408	7.74	182
1966	7,735.77	6,163	7,033	702	8.16	86
1967	8,211.67	6,463	7,376	836	8.53	98
1968	8,791.15	6,831	7,796	995	8.88	112
1969	1,348.13	1,034	1,180	168	9.33	18
1970	15,727.39	11,906	13,587	2,140	9.73	220
1971	4,285.71	3,201	3,653	633	10.05	63
1972	2,869.42	2,114	2,413	457	10.63	43
1973	4,594.57	3,338	3,809	785	10.90	72
1974	353.17	253	289	64	10.67	6
1975	273.35	193	220	53	10.60	5
1977	149.55	102	116	33	11.00	3
1978	12,017.25	8,103	9,247	2,770	13.00	213
1979	2,550.30	1,691	1,930	620	13.48	46
1980	159.82	104	119	41	13.67	3
1982	3,057.11	1,927	2,199	858	14.79	58
1983	920.81	570	651	270	15.00	18
1984	3,437.16	2,088	2,383	1,054	15.73	67
1985	1,838.06	1,095	1,250	588	16.33	36
1986	2,260.86	1,320	1,506	754	16.76	45
1987	1,089.19	623	711	378	17.18	22
1988	2,822.61	1,581	1,804	1,018	17.55	58
1991	1,709.26	894	1,020	689	19.14	36
1992	4,371.47	2,233	2,548	1,823	19.60	93
1993	6,199.86	3,088	3,524	2,676	20.12	133
1998	1,166.41	504	575	591	22.73	26
1999	13,234.55	5,539	6,321	6,913	23.28	297
2000	22,547.73	9,132	10,422	12,126	23.82	509
2001	1,385.59	542	619	767	24.74	31
2002	4,877.35	1,840	2,100	2,777	25.02	111
2003	1,410.68	512	584	826	25.81	32
2005	38,922.95	13,029	14,869	24,054	26.61	904
2006	5,221.75	1,672	1,908	3,314	27.16	122
2007	3,377.26	1,033	1,179	2,198	27.82	79
2008	15,590.74	4,541	5,182	10,408	28.36	367
2009	27,562.85	7,628	8,705	18,858	28.92	652
2010	26,787.30	7,018	8,009	18,778	29.53	636
2011	35,041.83	8,664	9,888	25,154	30.12	835

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 375.4 STRUCTURES AND IMPROVEMENTS - SMALL
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
2012	21,443.90	4,986	5,690	15,754	30.71	513
2013	16,054.43	3,496	3,990	12,065	31.26	386
2014	29,059.45	5,892	6,724	22,335	31.91	700
2015	51,381.78	9,647	11,009	40,372	32.48	1,243
2016	10,085.90	1,742	1,988	8,098	33.05	245
2017	44,103.14	6,957	7,940	36,164	33.70	1,073
2018	8,654.06	1,235	1,409	7,245	34.34	211
2019	28,215.64	3,605	4,114	24,102	34.88	691
2020	47,725.15	5,369	6,127	41,598	35.49	1,172
2021	45,462.31	4,433	5,059	40,403	36.11	1,119
2022	31,675.21	2,605	2,973	28,702	36.70	782
2024	12,539.76	646	737	11,803	37.95	311
2025	4,992.79	180	205	4,787	38.60	124
2026	603,782.15	12,528	14,297	589,485	39.17	15,049
2027	703,061.51	9,140	10,431	692,631	39.48	17,544
	2,036,506.13	274,300	311,546	1,724,960		47,630
	2,036,506.13	274,300	311,546	1,724,960		47,630

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 36.20 2.34

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-L1.5						
NET SALVAGE PERCENT: 0						
1883	3,083.38	2,848	2,689	394	11.94	33
1884	1,113.65	1,022	965	149	12.42	12
1885	2,279.13	2,109	1,991	288	11.52	25
1886	18,238.50	16,756	15,819	2,420	12.54	193
1887	42,943.25	39,173	36,982	5,961	13.52	441
1888	35,629.38	32,765	30,933	4,696	12.17	386
1889	244.13	223	211	33	11.00	3
1890	26.87	24	23	4		
1891	536.62	490	463	74	12.33	6
1892	1,027.83	932	880	148	13.45	11
1893	494.90	452	427	68	13.60	5
1894	224.37	203	192	32	16.00	2
1895	437.96	394	372	66	16.50	4
1896	246.22	223	211	35	11.67	3
1897	147.23	132	125	22	11.00	2
1898	68.77	61	58	11	11.00	1
1899	47,132.56	42,339	39,971	7,162	14.53	493
1901	269.56	242	228	42	14.00	3
1902	794.38	707	667	127	15.88	8
1903	585.83	524	495	91	15.17	6
1904	52.86	47	44	9	9.00	1
1905	393.18	346	327	66	16.50	4
1906	19.66	17	16	4		
1909	122.40	107	101	21	21.00	1
1910	36.02	32	30	6		
1911	4,323.88	3,773	3,562	762	16.93	45
1912	2,001.11	1,731	1,634	367	18.35	20
1913	2,019.08	1,754	1,656	363	17.29	21
1914	1,622.16	1,397	1,319	303	17.82	17
1915	464.35	402	380	84	16.80	5
1916	103,350.09	88,602	83,647	19,703	18.54	1,063
1917	1,944.39	1,673	1,579	365	18.25	20
1918	2,220.76	1,894	1,788	433	18.83	23
1919	17,371.53	14,867	14,036	3,336	18.23	183
1920	5,042.10	4,275	4,036	1,006	19.35	52
1921	13,757.07	11,703	11,049	2,708	18.68	145
1922	13,151.67	11,083	10,463	2,689	19.63	137
1923	6,669.97	5,637	5,322	1,348	18.99	71
1924	31,075.54	26,330	24,858	6,218	18.62	334
1925	57,452.15	48,208	45,512	11,940	19.61	609
1926	114,326.61	96,160	90,782	23,545	19.14	1,230
1927	75,361.62	62,761	59,251	16,111	20.14	800
1928	44,482.15	37,116	35,040	9,442	19.71	479
1929	77,028.28	63,625	60,067	16,961	20.71	819
1930	89,541.36	74,078	69,935	19,606	20.32	965
1931	42,080.73	34,456	32,529	9,552	21.32	448
1932	21,789.69	17,865	16,866	4,924	20.95	235
1933	5,784.09	4,747	4,482	1,302	20.67	63
1934	23,448.38	19,040	17,975	5,473	21.63	253
1935	33,379.24	27,121	25,604	7,775	21.30	365
1936	31,990.45	26,005	24,551	7,439	21.01	354
1937	45,561.43	36,631	34,582	10,979	22.00	499
1938	43,338.49	34,844	32,895	10,443	21.80	479

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-L1.5						
NET SALVAGE PERCENT: 0						
1939	30,316.78	24,102	22,754	7,563	22.78	332
1940	22,170.07	17,619	16,634	5,536	22.60	245
1941	31,179.78	24,766	23,381	7,799	22.35	349
1942	7,862.26	6,239	5,890	1,972	22.16	89
1943	2,918.17	2,289	2,161	757	22.94	33
1944	4,030.07	3,157	2,980	1,050	22.83	46
1945	8,213.96	6,425	6,066	2,148	22.85	94
1946	33,541.63	25,918	24,469	9,073	23.94	379
1947	109,800.45	84,678	79,942	29,858	23.83	1,253
1948	108,432.00	83,438	78,772	29,660	23.77	1,248
1949	197,503.94	151,624	143,145	54,359	23.70	2,294
1950	258,554.82	197,950	186,880	71,675	23.68	3,027
1951	267,305.59	202,003	190,706	76,600	24.68	3,104
1952	171,441.37	129,147	121,925	49,516	24.67	2,007
1953	171,653.35	128,877	121,670	49,983	24.67	2,026
1954	253,575.53	189,674	179,067	74,509	24.71	3,015
1955	720,028.96	536,422	506,423	213,606	24.76	8,627
1956	819,430.68	607,936	573,938	245,493	24.82	9,891
1957	432,937.31	319,724	301,844	131,093	24.90	5,265
1958	214,374.97	157,544	148,733	65,642	25.01	2,625
1959	344,910.38	249,819	235,848	109,062	26.01	4,193
1960	201,775.23	145,379	137,249	64,526	26.12	2,470
1961	211,508.86	151,525	143,051	68,458	26.26	2,607
1962	189,200.51	134,730	127,195	62,006	26.41	2,348
1963	281,095.08	198,931	187,806	93,289	26.57	3,511
1964	352,929.86	248,110	234,235	118,695	26.76	4,436
1965	683,284.85	481,306	454,389	228,896	26.16	8,750
1966	1,217,153.23	851,034	803,440	413,713	26.39	15,677
1967	1,439,118.88	998,461	942,623	496,496	26.63	18,644
1968	1,321,701.50	909,727	858,851	462,850	26.87	17,226
1969	1,396,922.91	953,400	900,082	496,841	27.14	18,307
1970	1,417,353.29	958,840	905,217	512,136	27.42	18,677
1971	1,875,390.98	1,257,262	1,186,950	688,441	27.70	24,853
1972	1,546,896.20	1,027,139	969,697	577,199	28.00	20,614
1973	1,965,860.16	1,303,169	1,230,290	735,570	27.63	26,622
1974	1,835,724.13	1,204,235	1,136,889	698,835	27.97	24,985
1975	1,138,829.81	738,987	697,660	441,170	28.31	15,584
1976	1,243,910.78	798,218	753,578	490,333	28.66	17,109
1977	3,232,657.09	2,066,314	1,950,756	1,281,901	28.41	45,121
1978	3,001,282.95	1,895,310	1,789,316	1,211,967	28.79	42,097
1979	2,256,562.77	1,406,967	1,328,283	928,280	29.19	31,801
1980	3,196,903.62	1,982,400	1,871,535	1,325,369	29.00	45,702
1981	2,724,912.30	1,666,556	1,573,355	1,151,557	29.42	39,142
1982	2,854,391.89	1,720,913	1,624,672	1,229,720	29.86	41,183
1983	3,698,511.37	2,213,559	2,089,767	1,608,744	29.74	54,094
1984	4,494,532.39	2,648,628	2,500,505	1,994,027	30.20	66,027
1985	5,434,962.05	3,175,105	2,997,539	2,437,423	30.13	80,897
1986	5,978,747.72	3,434,791	3,242,702	2,736,046	30.61	89,384
1987	4,460,497.08	2,536,685	2,394,822	2,065,675	30.59	67,528
1988	7,025,623.26	3,923,811	3,704,374	3,321,249	31.09	106,827
1989	6,195,968.99	3,420,175	3,228,903	2,967,066	31.11	95,373
1990	6,033,601.20	3,265,988	3,083,339	2,950,262	31.63	93,274
1991	6,863,477.05	3,665,783	3,460,776	3,402,701	31.69	107,375
1992	7,014,564.52	3,667,916	3,462,790	3,551,775	32.24	110,167
1993	7,790,500.87	4,012,108	3,787,733	4,002,768	32.33	123,810

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-L1.5						
NET SALVAGE PERCENT: 0						
1994	5,940,319.83	2,989,763	2,822,562	3,117,758	32.89	94,793
1995	6,447,432.59	3,189,545	3,011,171	3,436,262	33.03	104,035
1996	5,710,051.77	2,755,100	2,601,023	3,109,029	33.60	92,531
1997	7,196,867.38	3,383,967	3,194,720	4,002,147	34.18	117,090
1998	5,081,269.90	2,339,925	2,209,066	2,872,204	34.36	83,592
1999	5,388,788.02	2,412,560	2,277,639	3,111,149	34.96	88,992
2000	5,650,754.56	2,471,075	2,332,881	3,317,874	35.17	94,338
2001	4,120,396.41	1,747,048	1,649,345	2,471,051	35.78	69,062
2002	5,281,982.38	2,180,931	2,058,964	3,223,018	36.02	89,479
2003	5,220,655.28	2,083,564	1,967,042	3,253,613	36.64	88,799
2004	4,668,058.38	1,807,939	1,706,831	2,961,227	36.91	80,228
2005	3,058,320.17	1,140,753	1,076,957	1,981,363	37.54	52,780
2006	5,160,642.93	1,860,412	1,756,369	3,404,274	37.84	89,965
2007	7,017,029.84	2,425,787	2,290,126	4,726,904	38.49	122,809
2008	6,002,877.73	1,995,957	1,884,334	4,118,544	38.81	106,121
2009	6,634,217.08	2,104,374	1,986,688	4,647,529	39.47	117,748
2010	5,576,292.63	1,691,290	1,596,706	3,979,587	39.81	99,965
2011	6,239,500.03	1,793,856	1,693,536	4,545,964	40.48	112,301
2012	5,411,818.31	1,476,885	1,394,291	4,017,527	40.85	98,348
2013	7,407,394.24	1,900,737	1,794,439	5,612,955	41.53	135,154
2014	5,628,506.75	1,358,159	1,282,205	4,346,302	41.92	103,681
2015	7,782,478.77	1,747,166	1,649,457	6,133,022	42.61	143,934
2016	9,706,411.55	2,023,787	1,910,608	7,795,804	43.02	181,213
2017	7,083,072.86	1,354,284	1,278,546	5,804,527	43.72	132,766
2018	9,014,598.49	1,573,047	1,485,075	7,529,523	44.14	170,583
2019	9,551,914.50	1,496,785	1,413,078	8,138,836	44.86	181,427
2020	12,479,424.88	1,738,384	1,641,166	10,838,259	45.30	239,255
2021	11,237,815.50	1,359,776	1,283,731	9,954,084	46.02	216,299
2022	10,472,375.40	1,077,607	1,017,342	9,455,033	46.48	203,422
2023	27,812,846.96	2,350,186	2,218,753	25,594,094	46.95	545,135
2024	28,639,736.84	1,881,631	1,776,402	26,863,335	47.43	566,379
2025	14,809,421.94	687,157	648,728	14,160,694	47.92	295,507
2026	24,784,473.88	666,702	629,417	24,155,057	48.17	501,454
2027	28,582,991.36	485,911	458,737	28,124,254	48.19	583,612
	426,654,001.60	126,664,809	119,581,152	307,072,850		7,546,538

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 40.70 1.77

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 376.2 MAINS - CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 27-S2.5						
NET SALVAGE PERCENT: 0						
1968	1,915.08	1,915	1,915			
1972	1,250.03	1,250	1,250			
1973	56,978.66	56,979	56,979			
1974	14,586.31	14,586	14,586			
1975	22,200.60	22,201	22,201			
1979	1,080.96	1,061	1,081			
1980	20,273.77	19,769	20,274			
1981	1,820.34	1,771	1,820			
1983	345.61	332	346			
1985	67,751.74	64,534	67,752			
1986	8,753.97	8,322	8,754			
1987	3,208.31	3,028	3,208			
1988	3,895.80	3,647	3,896			
1989	18,652.59	17,375	18,653			
1997	4,675.96	4,071	4,560	116	4.46	26
1998	2,493.64	2,143	2,400	94	4.70	20
1999	3,762.64	3,188	3,571	192	5.05	38
2001	489,486.09	402,162	450,433	39,053	5.72	6,827
2003	169,714.98	134,211	150,320	19,395	6.44	3,012
2004	4,516.06	3,488	3,907	609	6.84	89
2005	5,464.30	4,125	4,620	844	7.28	116
2006	34,010.72	24,960	27,956	6,055	7.74	782
2007	247,609.39	176,719	197,930	49,679	8.16	6,088
2009	3,392.79	2,258	2,529	864	9.19	94
2011	218,278.52	133,346	149,351	68,928	10.40	6,628
2012	340,243.81	198,260	222,057	118,187	10.98	10,764
2013	101,920.57	56,097	62,830	39,091	11.71	3,338
2016	180,590.36	81,049	90,778	89,812	13.92	6,452
2017	238,519.63	98,342	110,146	128,374	14.73	8,715
2018	42,906.79	16,099	18,031	24,876	15.54	1,601
2020	81,328.72	24,155	27,055	54,274	17.36	3,126
2023	3,766.66	666	746	3,021	20.14	150
2025	74,670.38	7,124	7,979	66,691	22.12	3,015
2026	250,452.61	13,650	15,288	235,165	23.12	10,171
2027	288,717.08	9,845	11,027	277,690	23.62	11,757
	3,009,235.48	1,612,728	1,786,229	1,223,006		82,809

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 14.80 2.75

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
1911	31.35	31	31			
1914	90.77	91	91			
1916	335.41	335	335			
1917	203.66	204	204			
1918	472.77	473	473			
1919	255.35	255	255			
1920	15.04	15	15			
1921	234.31	234	234			
1922	19.02	19	19			
1923	875.18	875	875			
1924	1,161.46	1,161	1,161			
1925	656.64	657	657			
1926	17.61	18	18			
1927	393.90	394	394			
1928	282.48	282	282			
1929	464.49	464	464			
1930	724.49	724	724			
1931	216.66	217	217			
1932	17.62	18	18			
1933	231.15	231	231			
1934	21.60	22	22			
1935	4.64	5	5			
1936	1,338.80	1,339	1,339			
1937	386.70	387	387			
1938	1,503.31	1,503	1,503			
1939	1,564.79	1,565	1,565			
1940	223.28	223	223			
1941	543.83	544	544			
1942	1,278.63	1,279	1,279			
1943	273.91	274	274			
1944	270.42	270	270			
1945	131.28	131	131			
1946	2,727.28	2,727	2,727			
1947	2,471.28	2,471	2,471			
1948	6,084.98	6,083	6,085			
1949	3,425.95	3,381	3,426			
1950	2,503.93	2,459	2,496	8	1.33	6
1951	6,910.19	6,752	6,854	56	1.81	31
1952	9,801.79	9,525	9,669	133	2.18	61
1953	9,057.44	8,752	8,884	173	2.58	67
1954	5,250.48	5,044	5,120	130	3.02	43
1955	16,119.76	15,391	15,623	497	3.43	145
1956	30,047.50	28,506	28,936	1,112	3.86	288
1957	8,863.23	8,354	8,480	383	4.30	89
1958	8,784.51	8,222	8,346	439	4.72	93
1959	9,404.92	8,740	8,872	533	5.23	102
1960	7,021.92	6,478	6,576	446	5.65	79
1961	5,020.65	4,596	4,665	356	6.14	58
1962	7,432.43	6,798	6,901	531	6.10	87
1963	7,047.65	6,393	6,490	558	6.56	85
1964	5,548.94	4,990	5,065	484	7.12	68
1965	17,517.58	15,615	15,851	1,667	7.58	220
1966	12,844.61	11,423	11,595	1,250	7.62	164

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
1967	14,752.90	12,996	13,192	1,561	8.17	191
1968	8,459.99	7,429	7,541	919	8.21	112
1969	13,164.85	11,443	11,616	1,549	8.80	176
1970	12,723.09	10,942	11,107	1,616	9.34	173
1971	13,825.73	11,839	12,018	1,808	9.47	191
1972	14,052.26	11,897	12,077	1,975	10.03	197
1973	42,883.13	36,116	36,661	6,222	10.18	611
1974	15,494.10	12,973	13,169	2,325	10.38	224
1975	5,064.40	4,188	4,251	813	10.99	74
1976	22,522.73	18,498	18,777	3,746	11.18	335
1977	24,399.16	19,895	20,195	4,204	11.39	369
1978	27,398.07	22,031	22,364	5,034	12.01	419
1979	29,984.75	23,913	24,274	5,711	12.28	465
1980	114,445.51	90,469	91,835	22,611	12.54	1,803
1981	54,736.70	42,859	43,506	11,231	12.84	875
1982	60,062.92	46,290	46,989	13,074	13.49	969
1983	160,393.24	122,300	124,147	36,246	13.81	2,625
1984	137,105.20	103,377	104,938	32,167	14.14	2,275
1985	135,150.82	100,701	102,221	32,930	14.48	2,274
1986	183,985.00	135,358	137,402	46,583	14.85	3,137
1987	183,196.93	133,001	135,009	48,188	15.22	3,166
1988	206,191.85	147,613	149,842	56,350	15.61	3,610
1989	180,361.90	127,209	129,130	51,232	16.02	3,198
1990	202,576.41	141,419	143,554	59,022	16.14	3,657
1991	225,685.20	154,978	157,318	68,367	16.58	4,123
1992	206,947.08	139,669	141,778	65,169	17.02	3,829
1993	256,490.41	170,848	173,427	83,063	17.21	4,826
1994	149,592.62	97,729	99,205	50,388	17.69	2,848
1995	205,789.31	131,746	133,735	72,054	18.17	3,966
1996	106,864.10	67,303	68,319	38,545	18.42	2,093
1997	149,111.22	92,270	93,663	55,448	18.69	2,967
1998	48,671.53	29,412	29,856	18,816	19.22	979
1999	18,243.12	10,804	10,967	7,276	19.51	373
2000	45,885.57	26,591	26,992	18,894	19.83	953
2001	46,681.27	26,431	26,830	19,851	20.17	984
2002	169,489.90	93,609	95,022	74,468	20.54	3,626
2003	49,867.19	26,819	27,224	22,643	20.91	1,083
2004	82,931.67	43,348	44,002	38,930	21.31	1,827
2005	155,409.31	79,134	80,329	75,080	21.53	3,487
2006	34,518.99	17,011	17,268	17,251	21.95	786
2007	191,906.77	91,693	93,077	98,830	22.22	4,448
2008	138,796.38	64,138	65,106	73,690	22.51	3,274
2009	155,398.87	69,230	70,275	85,124	22.82	3,730
2010	159,185.83	68,434	69,467	89,719	22.99	3,903
2011	219,882.88	90,856	92,228	127,655	23.19	5,505
2012	282,531.90	111,770	113,458	169,074	23.43	7,216
2013	199,266.27	75,123	76,257	123,009	23.69	5,192
2014	266,256.66	95,506	96,948	169,309	23.84	7,102
2015	215,092.07	72,959	74,061	141,031	24.03	5,869
2016	283,626.95	90,647	92,016	191,611	24.13	7,941
2017	467,712.69	140,173	142,289	325,424	24.15	13,475
2018	180,297.66	50,141	50,898	129,400	24.22	5,343
2019	535,174.40	137,379	139,453	395,721	24.13	16,400
2020	580,724.42	135,831	137,882	442,842	24.02	18,436
2021	463,776.81	97,208	98,676	365,101	23.88	15,289

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
2022	599,330.36	110,576	112,246	487,084	23.57	20,665
2023	443,649.64	69,964	71,020	372,630	23.14	16,103
2024	383,328.29	49,564	50,312	333,016	22.44	14,840
2025	540,539.06	52,973	53,773	486,766	21.48	22,661
2026	691,516.18	43,704	44,364	647,152	19.76	32,751
2027	800,566.39	34,905	35,432	765,134	18.29	41,833
	11,811,798.18	4,542,172	4,610,360	7,201,438		343,538

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 21.00 2.91

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 380 SERVICES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
1886	765.57	766	766			
1887	223.67	224	224			
1888	38.38	38	38			
1889	73.22	73	73			
1890	45.86	46	46			
1891	96.29	96	96			
1892	76.34	76	76			
1893	16.73	17	17			
1894	68.13	68	68			
1895	77.16	77	77			
1896	134.56	135	135			
1897	204.83	205	205			
1898	176.61	177	177			
1899	89.23	89	89			
1900	10.02	10	10			
1901	530.45	530	530			
1902	1,858.70	1,859	1,859			
1903	3,156.69	3,157	3,157			
1904	2,342.80	2,343	2,343			
1905	2,100.76	2,101	2,101			
1906	2,059.08	2,059	2,059			
1907	2,152.23	2,152	2,152			
1908	1,870.54	1,871	1,871			
1909	1,491.09	1,491	1,491			
1910	1,330.23	1,330	1,330			
1911	652.45	652	652			
1912	494.64	495	495			
1913	524.83	525	525			
1914	558.09	558	558			
1915	956.57	957	957			
1916	11,163.84	11,164	11,164			
1917	453.84	454	454			
1918	5,034.84	5,009	5,035			
1919	1,340.08	1,336	1,340			
1920	784.56	775	785			
1921	2,589.16	2,560	2,589			
1922	3,574.21	3,501	3,574			
1923	2,599.40	2,522	2,599			
1924	3,397.77	3,300	3,398			
1925	5,119.25	4,924	5,119			
1926	2,338.29	2,251	2,338			
1927	2,649.90	2,526	2,650			
1928	3,344.18	3,189	3,344			
1929	4,220.87	3,985	4,221			
1930	2,974.54	2,808	2,975			
1931	2,567.75	2,424	2,568			
1932	1,195.30	1,117	1,195			
1933	1,217.17	1,137	1,217			
1934	3,091.58	2,857	3,092			
1935	2,610.84	2,411	2,611			
1936	2,103.07	1,940	2,103			
1937	2,550.43	2,327	2,543	7	7.00	1
1938	2,439.84	2,223	2,429	11	11.00	1

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 380 SERVICES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
1939	2,656.19	2,417	2,641	15	7.50	2
1940	3,137.97	2,823	3,085	53	10.60	5
1941	3,238.12	2,908	3,178	60	10.00	6
1942	1,394.20	1,249	1,365	29	9.67	3
1943	671.59	595	650	22	11.00	2
1944	824.79	729	797	28	9.33	3
1945	950.50	837	915	36	12.00	3
1946	2,910.27	2,556	2,793	117	11.70	10
1947	4,213.73	3,656	3,995	219	12.17	18
1948	6,913.62	5,978	6,533	381	12.29	31
1949	8,439.18	7,272	7,947	492	12.62	39
1950	10,659.14	9,150	9,999	660	12.69	52
1951	12,642.62	10,712	11,706	937	13.78	68
1952	13,937.05	11,759	12,850	1,087	13.94	78
1953	11,285.43	9,480	10,360	925	14.23	65
1954	14,027.09	11,727	12,815	1,212	14.43	84
1955	21,539.63	17,917	19,580	1,960	14.63	134
1956	28,536.64	23,614	25,806	2,731	14.84	184
1957	23,966.32	19,554	21,369	2,597	15.84	164
1958	13,709.47	11,121	12,153	1,556	16.21	96
1959	19,173.16	15,459	16,894	2,279	16.40	139
1960	18,170.57	14,560	15,911	2,260	16.74	135
1961	19,929.79	15,864	17,336	2,594	16.95	153
1962	20,420.36	16,142	17,640	2,780	17.27	161
1963	29,622.90	23,251	25,409	4,214	17.63	239
1964	29,190.95	22,740	24,851	4,340	17.93	242
1965	32,019.73	24,748	27,045	4,975	18.29	272
1966	149,863.30	114,900	125,565	24,298	18.66	1,302
1967	178,246.12	135,503	148,080	30,166	19.03	1,585
1968	182,407.67	137,444	150,201	32,207	19.41	1,659
1969	187,161.53	139,754	152,726	34,436	19.79	1,740
1970	303,359.11	224,364	245,189	58,170	20.19	2,881
1971	416,327.33	304,877	333,175	83,152	20.59	4,038
1972	507,122.43	367,613	401,734	105,388	21.00	5,018
1973	522,518.60	374,750	409,534	112,985	21.42	5,275
1974	744,912.58	528,366	577,408	167,505	21.86	7,663
1975	464,216.97	327,969	358,411	105,806	21.74	4,867
1976	606,866.69	423,654	462,977	143,890	22.20	6,482
1977	1,453,274.94	1,002,178	1,095,199	358,076	22.66	15,802
1978	995,635.39	677,829	740,744	254,891	23.13	11,020
1979	1,538,439.87	1,033,524	1,129,455	408,985	23.61	17,323
1980	2,140,463.96	1,428,546	1,561,142	579,322	23.59	24,558
1981	2,185,989.20	1,438,162	1,571,651	614,338	24.09	25,502
1982	2,009,115.38	1,302,510	1,423,407	585,708	24.59	23,819
1983	1,980,726.26	1,264,496	1,381,865	598,861	25.11	23,850
1984	2,428,690.64	1,536,633	1,679,262	749,429	25.16	29,787
1985	1,389,421.71	864,637	944,892	444,530	25.69	17,304
1986	2,665,554.22	1,641,715	1,794,097	871,457	25.78	33,804
1987	2,587,582.74	1,565,488	1,710,795	876,788	26.33	33,300
1988	3,417,763.59	2,029,810	2,218,215	1,199,549	26.89	44,609
1989	3,573,308.34	2,095,745	2,290,270	1,283,038	27.03	47,467
1990	3,412,183.15	1,961,664	2,143,743	1,268,440	27.60	45,958
1991	3,748,731.32	2,124,781	2,322,001	1,426,730	27.77	51,377
1992	3,736,912.18	2,086,318	2,279,968	1,456,944	27.96	52,108
1993	3,984,183.76	2,174,966	2,376,844	1,607,340	28.56	56,279

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 380 SERVICES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
1994	4,179,870.56	2,243,337	2,451,561	1,728,310	28.78	60,052
1995	4,334,205.19	2,284,126	2,496,136	1,838,069	29.02	63,338
1996	4,112,670.56	2,126,251	2,323,607	1,789,064	29.27	61,123
1997	5,356,703.95	2,697,100	2,947,442	2,409,262	29.91	80,550
1998	4,216,102.96	2,077,696	2,270,545	1,945,558	30.19	64,444
1999	4,461,820.70	2,149,259	2,348,751	2,113,070	30.49	69,304
2000	4,748,017.62	2,232,043	2,439,219	2,308,799	30.81	74,937
2001	3,857,978.42	1,777,756	1,942,765	1,915,213	30.81	62,162
2002	4,698,163.50	2,106,657	2,302,194	2,395,970	31.16	76,892
2003	4,739,430.22	2,064,496	2,256,120	2,483,310	31.53	78,760
2004	4,351,195.86	1,847,953	2,019,478	2,331,718	31.61	73,765
2005	4,845,630.85	1,991,070	2,175,879	2,669,752	32.02	83,378
2006	4,783,700.47	1,908,218	2,085,337	2,698,363	32.14	83,957
2007	4,796,855.12	1,853,025	2,025,021	2,771,834	32.30	85,815
2008	5,224,027.77	1,939,159	2,119,149	3,104,879	32.75	94,805
2009	5,255,324.83	1,888,238	2,063,502	3,191,823	32.69	97,639
2010	4,828,935.29	1,665,500	1,820,090	3,008,845	32.92	91,399
2011	5,336,977.14	1,760,669	1,924,092	3,412,885	33.17	102,891
2012	5,200,741.92	1,642,914	1,795,407	3,405,335	33.21	102,539
2013	5,198,548.42	1,564,763	1,710,002	3,488,546	33.29	104,793
2014	4,765,897.95	1,366,383	1,493,209	3,272,689	33.18	98,634
2015	4,757,893.54	1,285,107	1,404,389	3,353,505	33.33	100,615
2016	5,492,215.12	1,400,515	1,530,509	3,961,706	33.11	119,653
2017	5,100,196.30	1,212,317	1,324,843	3,775,353	33.14	113,921
2018	5,542,545.24	1,226,011	1,339,808	4,202,737	32.86	127,898
2019	6,173,226.14	1,255,017	1,371,506	4,801,720	32.65	147,066
2020	5,633,620.75	1,041,093	1,137,726	4,495,895	32.35	138,977
2021	7,069,637.97	1,168,611	1,277,080	5,792,558	31.98	181,131
2022	5,474,442.71	794,342	868,072	4,606,371	31.43	146,560
2023	7,621,903.53	941,305	1,028,676	6,593,228	30.75	214,414
2024	6,091,512.68	615,243	672,349	5,419,164	29.67	182,648
2025	8,236,469.73	628,443	686,775	7,549,695	28.25	267,246
2026	14,446,825.96	705,005	770,443	13,676,383	25.99	526,217
2027	16,724,653.01	560,276	612,280	16,112,373	24.04	670,232
	245,616,638.42	83,707,829	91,471,655	154,144,983		5,246,522

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 29.40 2.14

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 381 METERS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 37-R1.5						
NET SALVAGE PERCENT: 0						
1917	2.41	2	2			
1919	30.34	30	30			
1920	40.78	41	41			
1922	41.81	42	42			
1923	16.10	16	16			
1924	33.37	33	33			
1929	16.90	17	17			
1931	25.95	26	26			
1938	39.05	39	39			
1944	75.63	76	76			
1945	9.67	10	10			
1946	69.78	70	70			
1949	350.67	351	351			
1950	1,400.04	1,400	1,400			
1951	721.81	722	722			
1952	551.95	552	552			
1953	2,264.86	2,265	2,265			
1954	691.55	690	692			
1955	643.46	638	643			
1956	252.47	249	252			
1957	3,175.95	3,127	3,176			
1958	4,210.98	4,117	4,211			
1959	3,002.19	2,913	3,002			
1960	3,362.26	3,260	3,362			
1961	2,459.74	2,366	2,460			
1962	7,915.00	7,602	7,915			
1963	7,372.67	7,067	7,373			
1964	2,886.35	2,742	2,865	21	3.50	6
1965	8,916.42	8,448	8,827	89	3.42	26
1966	7,049.30	6,658	6,957	92	3.54	26
1967	9,302.46	8,755	9,148	154	3.76	41
1968	7,453.01	6,987	7,300	153	3.92	39
1969	5,018.33	4,684	4,894	124	4.13	30
1970	10,334.89	9,599	10,030	305	4.42	69
1971	8,081.59	7,467	7,802	280	4.67	60
1972	9,975.75	9,163	9,574	402	4.90	82
1973	9,353.07	8,537	8,920	433	5.22	83
1974	119,549.61	108,396	113,258	6,292	5.49	1,146
1975	158,526.27	142,689	149,090	9,436	5.81	1,624
1976	57,598.30	51,447	53,755	3,843	6.14	626
1977	118,651.45	105,113	109,828	8,823	6.48	1,362
1978	37,815.68	33,395	34,893	2,923	6.52	448
1979	152,562.23	133,461	139,448	13,114	6.92	1,895
1980	120,691.70	104,543	109,232	11,460	7.31	1,568
1981	163,175.50	140,625	146,933	16,242	7.43	2,186
1982	72,270.85	61,596	64,359	7,912	7.86	1,007
1983	81,010.07	68,599	71,676	9,334	8.02	1,164
1984	132,748.07	111,017	115,997	16,751	8.48	1,975
1985	117,420.15	97,423	101,793	15,627	8.69	1,798
1986	78,622.25	64,344	67,230	11,392	9.17	1,242
1987	100,930.60	81,824	85,494	15,437	9.42	1,639
1988	200,294.56	159,935	167,109	33,186	9.93	3,342
1989	149,504.66	118,064	123,360	26,145	10.21	2,561

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 381 METERS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 37-R1.5						
NET SALVAGE PERCENT: 0						
1990	81,441.75	63,549	66,400	15,042	10.51	1,431
1991	131,861.50	101,573	106,129	25,732	10.83	2,376
1992	170,481.21	128,901	134,683	35,798	11.40	3,140
1993	258,751.74	192,770	201,417	57,335	11.75	4,880
1994	78,772.45	57,764	60,355	18,417	12.12	1,520
1995	138,128.63	99,591	104,058	34,071	12.51	2,724
1996	144,555.62	101,912	106,483	38,073	13.11	2,904
1997	185,822.38	128,515	134,280	51,542	13.53	3,809
1998	138,914.31	94,128	98,350	40,564	13.96	2,906
1999	157,059.18	104,130	108,801	48,258	14.40	3,351
2000	102,258.57	66,243	69,214	33,045	14.86	2,224
2001	151,850.22	95,969	100,274	51,576	15.33	3,364
2002	12,552.06	7,727	8,074	4,478	15.82	283
2003	36,049.36	21,579	22,547	13,502	16.33	827
2004	228,378.17	133,213	139,189	89,189	16.67	5,350
2005	315,146.28	178,058	186,045	129,101	17.19	7,510
2006	179,113.78	97,814	102,202	76,912	17.73	4,338
2007	354,491.11	187,419	195,826	158,665	18.13	8,752
2008	332,765.61	169,211	176,801	155,965	18.69	8,345
2009	543,545.08	266,065	278,000	265,545	19.12	13,888
2010	343,142.41	160,591	167,795	175,347	19.70	8,901
2011	117,339.23	52,509	54,864	62,475	20.16	3,099
2012	273,063.75	116,407	121,629	151,435	20.64	7,337
2013	436,497.37	176,432	184,346	252,151	21.13	11,933
2014	660,998.55	252,964	264,311	396,688	21.51	18,442
2015	1,072,085.23	386,058	403,375	668,710	21.91	30,521
2016	480,928.74	161,881	169,143	311,786	22.34	13,956
2017	804,175.36	250,983	262,241	541,934	22.78	23,790
2018	604,418.07	173,770	181,565	422,853	23.13	18,282
2019	440,252.95	115,214	120,382	319,871	23.51	13,606
2020	495,383.28	116,613	121,844	373,539	23.82	15,682
2021	1,157,946.79	241,316	252,141	905,806	24.06	37,648
2022	787,070.93	141,909	148,274	638,797	24.25	26,342
2023	876,744.47	132,564	138,510	738,234	24.32	30,355
2025	2,423,573.53	214,971	224,614	2,198,960	23.98	91,700
2026	963,388.77	52,505	54,860	908,529	23.12	39,296
2027	1,113,608.38	40,313	42,122	1,071,486	22.21	48,243
	18,771,077.33	6,776,363	7,079,694	11,691,383		549,100

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 21.30 2.93

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 382 METER INSTALLATIONS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
1925	11.28	11	11			
1966	14,399.10	11,040	12,643	1,756	18.68	94
1967	33,161.64	25,209	28,869	4,293	19.00	226
1968	33,438.60	25,196	28,854	4,585	19.43	236
1969	33,936.92	25,341	29,021	4,916	19.82	248
1970	47,682.16	35,266	40,387	7,295	20.21	361
1971	81,967.84	60,025	68,741	13,227	20.60	642
1972	122,018.66	88,451	101,294	20,725	21.00	987
1973	150,996.72	108,295	124,019	26,978	21.43	1,259
1974	83,514.44	59,237	67,838	15,676	21.86	717
1975	33,606.27	23,743	27,190	6,416	21.75	295
1976	56,145.72	39,195	44,886	11,260	22.21	507
1977	89,759.62	61,898	70,886	18,874	22.66	833
1978	45,600.96	31,045	35,553	10,048	23.15	434
1979	48,213.05	32,390	37,093	11,120	23.61	471
1980	58,253.46	38,878	44,523	13,730	23.59	582
1981	58,658.52	38,591	44,194	14,465	24.11	600
1982	56,907.24	36,893	42,250	14,657	24.59	596
1983	64,257.33	41,022	46,978	17,279	25.11	688
1984	62,003.03	39,229	44,925	17,078	25.15	679
1985	71,329.91	44,389	50,834	20,496	25.68	798
1986	67,066.93	41,307	47,305	19,762	25.77	767
1987	65,988.12	39,923	45,720	20,268	26.32	770
1988	80,012.85	47,520	54,420	25,593	26.88	952
1989	63,611.28	37,308	42,725	20,886	27.02	773
1990	57,635.99	33,135	37,946	19,690	27.62	713
1991	60,939.27	34,540	39,555	21,384	27.77	770
1992	56,031.82	31,283	35,825	20,207	27.95	723
1993	54,692.19	29,856	34,191	20,501	28.55	718
1994	47,108.85	25,283	28,954	18,155	28.77	631
1995	45,052.79	23,743	27,191	17,862	29.00	616
1996	45,660.47	23,606	27,034	18,626	29.29	636
1997	71,399.97	35,950	41,170	30,230	29.90	1,011
1998	51,537.16	25,398	29,086	22,451	30.18	744
1999	67,464.66	32,498	37,217	30,248	30.49	992
2000	73,965.60	34,771	39,820	34,146	30.82	1,108
2001	47,621.64	21,944	25,130	22,492	30.81	730
2002	61,159.93	27,424	31,406	29,754	31.16	955
2003	58,134.31	25,323	29,000	29,134	31.53	924
2004	44,297.73	18,813	21,545	22,753	31.60	720
2005	43,530.33	17,887	20,484	23,046	32.01	720
2006	45,700.59	18,230	20,877	24,824	32.16	772
2007	44,746.19	17,285	19,795	24,951	32.32	772
2008	47,650.29	17,688	20,256	27,394	32.77	836
2009	48,516.37	17,432	19,963	28,553	32.71	873
2010	40,368.75	13,923	15,945	24,424	32.92	742
2011	41,219.50	13,598	15,572	25,648	33.18	773
2012	42,933.18	13,563	15,532	27,401	33.21	825
2013	42,772.52	12,875	14,744	28,029	33.29	842
2014	36,437.26	10,447	11,964	24,473	33.16	738
2015	40,769.66	11,012	12,611	28,159	33.32	845
2016	53,123.20	13,546	15,513	37,610	33.11	1,136
2017	41,415.06	9,844	11,273	30,142	33.12	910

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 382 METER INSTALLATIONS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
2018	42,385.17	9,376	10,737	31,648	32.86	963
2019	46,495.80	9,453	10,826	35,670	32.66	1,092
2020	36,332.83	6,714	7,689	28,644	32.37	885
2021	40,756.13	6,737	7,715	33,041	31.99	1,033
2022	60,319.36	8,752	10,023	50,296	31.44	1,600
2023	47,222.40	5,832	6,679	40,543	30.76	1,318
2024	43,756.42	4,419	5,061	38,695	29.67	1,304
2025	39,188.18	2,990	3,424	35,764	28.25	1,266
2026	221,727.48	10,820	12,391	209,336	25.99	8,054
2027	256,591.79	8,596	9,844	246,748	24.04	10,264
	3,769,202.49	1,715,988	1,965,147	1,804,055		65,069

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 27.70 1.73

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 384 HOUSE REGULATOR INSTALLATIONS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
1966	3,405.10	2,611	3,222	183	18.30	10
1967	4,411.49	3,354	4,139	272	19.43	14
1968	3,247.53	2,447	3,019	229	19.08	12
1969	3,214.48	2,400	2,961	253	19.46	13
1970	5,189.37	3,838	4,736	453	20.59	22
1971	7,079.33	5,184	6,397	682	20.67	33
1972	9,501.67	6,888	8,499	1,003	20.90	48
1973	15,464.47	11,091	13,686	1,778	21.42	83
1974	27,972.10	19,841	24,483	3,489	21.81	160
1975	12,945.98	9,146	11,286	1,660	21.84	76
1976	8,105.98	5,659	6,983	1,123	22.02	51
1977	28,067.07	19,355	23,883	4,184	22.62	185
1978	8,585.71	5,845	7,212	1,374	23.29	59
1979	493.47	332	410	83	20.75	4
1980	6,627.42	4,423	5,458	1,169	23.38	50
1981	13,925.61	9,162	11,305	2,621	24.05	109
1982	11,268.48	7,305	9,014	2,254	24.50	92
1983	17,046.62	10,883	13,429	3,618	25.13	144
1984	16,300.74	10,313	12,726	3,575	25.18	142
1985	17,298.90	10,765	13,284	4,015	25.74	156
1986	19,260.13	11,862	14,637	4,623	25.83	179
1987	18,427.67	11,149	13,757	4,671	26.39	177
1988	20,271.71	12,039	14,856	5,416	26.95	201
1989	19,761.96	11,590	14,302	5,460	27.03	202
1990	14,089.10	8,100	9,995	4,094	27.66	148
1991	16,324.52	9,253	11,418	4,907	27.72	177
1992	13,717.87	7,659	9,451	4,267	27.89	153
1993	17,273.55	9,430	11,636	5,638	28.62	197
1994	13,882.09	7,451	9,194	4,688	28.76	163
1995	12,837.18	6,765	8,348	4,489	28.96	155
1996	17,955.35	9,283	11,455	6,500	29.28	222
1997	31,404.86	15,812	19,511	11,894	29.88	398
1998	21,640.76	10,665	13,160	8,481	30.18	281
1999	33,277.52	16,030	19,780	13,498	30.47	443
2000	37,092.79	17,437	21,516	15,577	30.78	506
2001	25,546.25	11,772	14,526	11,020	30.78	358
2002	33,367.99	14,962	18,462	14,906	31.18	478
2003	31,740.52	13,826	17,061	14,680	31.50	466
2004	23,212.07	9,858	12,164	11,048	31.57	350
2005	22,737.24	9,343	11,529	11,208	32.02	350
2006	23,972.87	9,563	11,800	12,173	32.12	379
2007	24,588.08	9,498	11,720	12,868	32.33	398
2008	25,956.95	9,635	11,889	14,068	32.72	430
2009	25,340.75	9,105	11,235	14,106	32.65	432
2010	21,462.59	7,402	9,134	12,329	32.88	375
2011	21,675.76	7,151	8,824	12,852	33.21	387
2012	21,481.01	6,786	8,374	13,107	33.18	395
2013	19,701.58	5,930	7,317	12,385	33.29	372
2014	19,236.40	5,515	6,805	12,431	33.15	375
2015	22,143.34	5,981	7,380	14,763	33.33	443
2016	29,602.64	7,549	9,315	20,288	33.10	613
2017	22,344.92	5,311	6,554	15,791	33.17	476
2018	23,308.64	5,156	6,362	16,947	32.84	516

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 384 HOUSE REGULATOR INSTALLATIONS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
2019	27,198.65	5,529	6,823	20,376	32.65	624
2020	21,060.10	3,892	4,803	16,257	32.32	503
2021	24,494.12	4,049	4,996	19,498	31.96	610
2022	35,032.27	5,083	6,272	28,760	31.43	915
2023	27,325.26	3,375	4,165	23,160	30.76	753
2024	25,223.48	2,548	3,144	22,079	29.68	744
2025	22,764.18	1,737	2,143	20,621	28.25	730
2026	75,376.02	3,678	4,539	70,837	25.99	2,726
2027	87,241.21	2,923	3,607	83,634	24.04	3,479
	1,310,503.47	502,524	620,091	690,412		23,742

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 29.10 1.81

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 385 INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R2						
NET SALVAGE PERCENT: 0						
1929	52.07	52	52			
1930	36.47	36	36			
1933	703.58	690	704			
1937	146.82	142	147			
1938	1,324.68	1,278	1,325			
1939	320.49	309	320			
1940	252.23	242	252			
1941	390.38	371	390			
1945	468.32	440	468			
1946	291.58	273	292			
1947	1,345.05	1,253	1,345			
1948	75.11	70	75			
1949	592.85	548	593			
1950	230.65	212	231			
1951	239.21	219	239			
1952	316.83	289	317			
1953	5,762.82	5,226	5,763			
1955	6,539.91	5,866	6,540			
1956	116.18	104	116			
1957	869.38	777	869			
1958	4,573.90	4,059	4,574			
1959	3,503.17	3,088	3,503			
1960	3,278.44	2,870	3,259	19	9.50	2
1961	1,030.29	895	1,016	14	14.00	1
1962	1,533.49	1,332	1,512	21	10.50	2
1963	4,616.52	3,980	4,519	98	9.80	10
1964	2,461.33	2,104	2,389	72	10.29	7
1965	1,221.10	1,035	1,175	46	11.50	4
1966	34,258.05	28,787	32,688	1,570	11.63	135
1967	33,686.48	28,249	32,077	1,609	11.58	139
1968	41,601.28	34,558	39,241	2,360	12.10	195
1969	59,074.36	48,589	55,173	3,901	12.58	310
1970	52,874.54	43,045	48,878	3,997	13.10	305
1971	48,600.17	39,424	44,766	3,834	13.13	292
1972	27,964.98	22,436	25,476	2,489	13.60	183
1973	30,613.66	24,286	27,577	3,037	14.19	214
1974	31,405.67	24,622	27,958	3,448	14.67	235
1975	19,732.65	15,388	17,473	2,260	14.77	153
1976	17,140.67	13,198	14,986	2,155	15.28	141
1977	12,736.80	9,680	10,992	1,745	15.86	110
1978	42,268.60	31,697	35,992	6,277	16.43	382
1979	48,076.96	35,784	40,633	7,444	16.62	448
1980	63,874.16	46,864	53,214	10,660	17.19	620
1981	50,092.18	36,207	41,113	8,979	17.78	505
1982	77,028.76	55,176	62,653	14,376	17.97	800
1983	27,109.36	19,109	21,698	5,411	18.53	292
1984	71,657.95	49,680	56,412	15,246	19.18	795
1985	86,103.07	59,049	67,051	19,052	19.40	982
1986	234,887.12	158,243	179,686	55,201	20.02	2,757
1987	171,002.60	113,118	128,446	42,557	20.64	2,062
1988	247,592.75	161,653	183,558	64,035	20.91	3,062
1989	295,838.55	189,396	215,061	80,778	21.54	3,750
1990	383,325.48	240,422	273,001	110,324	22.19	4,972

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 385 INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R2						
NET SALVAGE PERCENT: 0						
1991	295,978.52	182,826	207,600	88,379	22.49	3,930
1992	272,667.72	164,746	187,070	85,598	23.15	3,698
1993	324,471.80	191,601	217,565	106,907	23.81	4,490
1994	387,119.55	224,529	254,955	132,165	24.14	5,475
1995	499,426.19	282,575	320,866	178,560	24.81	7,197
1996	662,065.48	367,182	416,938	245,127	25.16	9,743
1997	511,886.36	276,367	313,817	198,069	25.85	7,662
1998	452,263.60	237,484	269,665	182,599	26.53	6,883
1999	499,814.06	256,305	291,036	208,778	26.92	7,755
2000	269,920.64	134,286	152,483	117,438	27.61	4,253
2001	253,664.51	122,900	139,554	114,111	28.02	4,072
2002	612,145.34	286,913	325,792	286,353	28.72	9,971
2003	212,026.61	96,472	109,545	102,482	29.14	3,517
2004	403,732.85	177,118	201,119	202,614	29.86	6,785
2005	140,505.62	59,617	67,696	72,810	30.30	2,403
2006	235,046.58	95,781	108,760	126,287	31.02	4,071
2007	455,581.28	178,770	202,995	252,586	31.48	8,024
2008	346,955.71	130,802	148,527	198,429	31.95	6,211
2009	275,298.69	98,915	112,319	162,980	32.69	4,986
2010	246,552.18	84,617	96,083	150,469	33.17	4,536
2011	212,857.85	69,541	78,964	133,894	33.66	3,978
2012	446,658.25	138,330	157,075	289,583	34.17	8,475
2013	920,015.48	269,013	305,466	614,549	34.69	17,715
2014	310,161.80	85,201	96,746	213,416	35.21	6,061
2015	397,777.26	102,030	115,856	281,921	35.75	7,886
2016	359,887.13	85,653	97,260	262,627	36.29	7,237
2017	312,111.27	68,384	77,651	234,460	36.83	6,366
2018	709,487.78	142,394	161,689	547,799	37.18	14,734
2019	1,019,383.33	185,222	210,321	809,062	37.54	21,552
2020	397,785.99	64,481	73,219	324,567	37.91	8,562
2021	322,603.83	45,777	51,980	270,624	38.31	7,064
2022	102,404.29	12,401	14,081	88,323	38.72	2,281
2023	784,330.25	78,825	89,507	694,823	38.77	17,922
2024	713,298.50	56,351	63,987	649,311	38.86	16,709
2025	968,663.96	55,117	62,586	906,078	38.65	23,443
2026	1,124,525.79	38,121	43,286	1,081,240	38.04	28,424
2027	1,298,354.47	28,564	32,435	1,265,919	37.05	34,168
	20,008,270.22	6,741,631	7,654,318	12,353,952		372,104

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 33.20 1.86

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 390.11 OTHER SMALL STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
2000	2,672.45	1,549	1,598	1,074	19.89	54
2001	2,960.70	1,676	1,729	1,232	20.20	61
2010	739.24	318	328	411	22.83	18
2018	5,505.83	1,531	1,579	3,927	24.24	162
2021	78,191.84	16,389	16,904	61,288	23.88	2,566
2025	1,304,025.81	127,795	131,809	1,172,217	21.48	54,572
2026	24,506.65	1,549	1,598	22,909	19.77	1,159
2027	24,994.25	1,090	1,124	23,870	18.29	1,305
	1,443,596.77	151,897	156,669	1,286,928		59,897

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 21.50 4.15

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 391.1 OFFICE FURNITURE AND EQUIPMENT - FURNITURE
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 25-SQUARE						
NET SALVAGE PERCENT: 0						
2000	3,243.14	3,243	3,243			
2006	23,544.56	20,091	22,039	1,506	3.67	410
2007	1,840.83	1,497	1,642	199	4.63	43
2008	43,435.12	33,590	36,847	6,588	5.67	1,162
2010	9,808.61	6,801	7,461	2,348	7.67	306
2011	5,186.58	3,389	3,718	1,469	8.69	169
2013	12,460.86	7,144	7,837	4,624	10.68	433
2014	26,836.01	14,312	15,700	11,136	11.67	954
2016	9,333.30	4,231	4,641	4,692	13.68	343
2017	5,476.94	2,264	2,484	2,993	14.67	204
2018	26,642.62	9,946	10,910	15,733	15.67	1,004
2019	30,278.31	10,093	11,071	19,207	16.67	1,152
2020	21,253.10	6,234	6,839	14,414	17.66	816
2021	6,504.26	1,648	1,808	4,696	18.63	252
2022	11,912.96	2,541	2,787	9,126	19.67	464
2023	29,698.89	5,148	5,647	24,052	20.66	1,164
2026	61,283.88	3,268	3,585	57,699	23.67	2,438
2027	60,985.97	2,033	2,230	58,756	24.17	2,431
	389,725.94	137,473	150,489	239,237		13,745

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 17.40 3.53

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 391.2 OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 15-SQUARE						
NET SALVAGE PERCENT: 0						
2010	124,216.70	124,217	124,217			
2011	23,261.72	23,262	23,262			
2012	7,178.49	7,178	7,178			
2013	36,982.54	35,339	36,983			
2016	3,101.70	2,344	3,102			
2026	50,232.69	4,465	11,151	39,082	13.67	2,859
2027	49,988.50	2,777	6,936	43,052	14.17	3,038
	294,962.33	199,582	212,829	82,133		5,897

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 13.90 2.00

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 391.3 OFFICE FURNITURE AND EQUIPMENT - COMPUTERS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 5-SQUARE						
NET SALVAGE PERCENT: 0						
2021	1,119,044.95	1,119,045	1,119,045			
2023	2,592,373.85	2,246,733	2,147,316	445,058	1.00	445,058
2024	246,095.08	164,064	156,804	89,291	1.67	53,468
2025	2,211,955.35	1,032,253	986,576	1,225,379	2.67	458,943
2026	1,571,278.39	419,013	400,472	1,170,806	3.67	319,021
2027	1,563,640.27	260,612	249,080	1,314,560	4.17	315,242
	9,304,387.88	5,241,720	5,059,293	4,245,095		1,591,732

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 2.70 17.11

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 394 TOOLS, SHOP AND GARAGE EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 25-SQUARE						
NET SALVAGE PERCENT: 0						
2001	15,217.13	15,217	15,217			
2002	65,639.79	65,640	65,640			
2003	26,498.97	25,792	25,426	1,073	1.00	1,073
2004	141,628.51	132,186	130,312	11,317	1.67	6,777
2005	95,477.20	85,293	84,084	11,393	2.67	4,267
2006	55,377.89	47,256	46,586	8,792	3.67	2,396
2007	72,167.11	58,696	57,864	14,303	4.67	3,063
2008	87,428.76	67,611	66,652	20,777	5.67	3,664
2009	61,254.65	44,920	44,283	16,972	6.67	2,545
2010	59,267.88	41,092	40,509	18,759	7.67	2,446
2011	64,734.21	42,293	41,693	23,041	8.67	2,658
2012	158,725.32	97,351	95,971	62,754	9.67	6,490
2013	80,839.05	46,347	45,690	35,149	10.67	3,294
2014	205,098.35	109,385	107,834	97,264	11.67	8,335
2015	444,762.89	219,415	216,304	228,459	12.67	18,031
2016	174,477.56	79,096	77,974	96,504	13.67	7,060
2017	500,397.48	206,829	203,896	296,501	14.67	20,211
2018	303,590.52	113,339	111,732	191,859	15.67	12,244
2019	364,694.67	121,564	119,840	244,855	16.67	14,688
2020	479,303.99	140,594	138,600	340,704	17.67	19,281
2021	428,877.05	108,647	107,106	321,771	18.67	17,235
2022	1,941,234.68	414,124	408,252	1,532,983	19.67	77,935
2023	752,229.28	130,384	128,535	623,694	20.67	30,174
2024	518,146.80	69,085	68,105	450,042	21.67	20,768
2025	1,188,459.98	110,919	109,346	1,079,114	22.67	47,601
2026	1,946,014.22	103,781	102,310	1,843,704	23.67	77,892
2027	1,936,554.47	64,545	63,630	1,872,924	24.17	77,490
	12,168,098.41	2,761,401	2,723,391	9,444,707		487,618

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 19.40 4.01

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 397 COMMUNICATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF OCTOBER 31, 2027

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 10-SQUARE						
NET SALVAGE PERCENT: 0						
2017	217,386.18	217,386	217,386			
2018	245,841.64	229,451	221,428	24,414	1.00	24,414
2019	231,811.32	193,175	186,420	45,391	1.67	27,180
2020	302,121.56	221,555	213,808	88,314	2.67	33,076
2021	158,338.81	100,281	96,774	61,565	3.67	16,775
2022	327,547.58	174,691	168,582	158,966	4.67	34,040
2023	433,401.15	187,806	181,239	252,162	5.67	44,473
2024	64,958.62	21,653	20,896	44,063	6.67	6,606
2025	1,062,632.59	247,944	239,274	823,359	7.67	107,348
2026	981,546.66	130,870	126,293	855,254	8.67	98,645
2027	976,775.28	81,395	78,549	898,226	9.17	97,953
	5,002,361.40	1,806,207	1,750,649	3,251,712		490,510

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 6.60 9.81

PART III. EXPERIENCED AND ESTIMATED NET SALVAGE

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
EXPERIENCED RETIREMENTS BY ACCOUNT AND ASSOCIATED
COST OF REMOVAL, GROSS SALVAGE AND NET SALVAGE

ACCT	REGULAR RETIREMENTS	COST OF REMOVAL	GROSS SALVAGE	NET SALVAGE
2023	**TRANSACTION YEAR**			
332.00				
334.00	32,094	1,449		(1,449)
366.20				
367.10	3,394	5,666		(5,666)
367.20	21,245	979		(979)
369.00	36,002	8,681		(8,681)
374.10	3,653	6,697	11,154	4,457
374.20	1,133	457		(457)
375.00	244,170	154,258	50	(154,208)
376.10	1,696,263	859,668	4,017	(855,651)
376.20	5,497	2,272		(2,272)
378.00	225,387	38,866		(38,866)
380.00	1,816,644	274,337		(274,337)
385.00	36,721	10,669		(10,669)
390.11		852		(852)
TOTAL	**6,003,860**	**1,364,851**	**15,221**	**(1,349,630)**
2024	**TRANSACTION YEAR**			
332.00				
334.00	37,849	5,218		(5,218)
366.20	249	1,203		(1,203)
367.10	386,685	57,624		(57,624)
367.20	9,423	219		(219)
369.00	2,510	6,731		(6,731)
374.10	2,952	12,578	(10,169)	(22,747)
374.20				
375.00	63,071	34,622		(34,622)
376.10	1,924,230	1,694,252	16,962	(1,677,291)
376.20	9,148	45		(45)
378.00	186,640	36,322		(36,322)
380.00	1,992,351	359,988		(359,988)
385.00	9,607	49,517	1	(49,516)
390.11				
TOTAL	**7,494,915**	**2,258,317**	**6,794**	**(2,251,523)**
2025	**TRANSACTION YEAR**			
332.00				
334.00	44,208	8,333		(8,333)
366.20				
367.10	284,617	121,648		(121,648)
367.20		455		(455)
369.00	19,585	10,377		(10,377)
374.10	831	2,974		(2,974)
374.20	978	1,597		(1,597)
375.00	55,285	45,561		(45,561)
376.10	2,008,866	1,165,857		(1,165,857)
376.20				
378.00	399,560	99,189		(99,189)
380.00	2,325,865	523,729		(523,729)
385.00	63,849	26,737		(26,737)
390.11				
TOTAL	**8,364,564**	**2,006,455**		**(2,006,455)**
2026	**TRANSACTION YEAR**			

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
EXPERIENCED RETIREMENTS BY ACCOUNT AND ASSOCIATED
COST OF REMOVAL, GROSS SALVAGE AND NET SALVAGE

ACCT	REGULAR RETIREMENTS	COST OF REMOVAL	GROSS SALVAGE	NET SALVAGE
332.00	8,846			
334.00	64,311	10,576		(10,576)
366.20	1,482	445		(445)
367.10	413,983	175,612		(175,612)
367.20	45,998	1,510		(1,510)
369.00	51,385	40,962		(40,962)
374.10	4,300	8,601	546	(8,055)
374.20	68,805	66,948		(66,948)
375.00	56,519	41,040	6	(41,034)
376.10	1,710,842	1,158,076	10,256	(1,147,819)
376.20	17,281	1,356		(1,356)
378.00	47,918	13,133		(13,133)
380.00	1,001,058	189,046		(189,046)
385.00	77,713	48,494	1	(48,493)
390.11				
TOTAL	**3,579,624**	**1,755,799**	**10,809**	**(1,744,990)**
2027	**TRANSACTION YEAR**			
332.00	9,593			
334.00	69,740	11,469		(11,469)
366.20	2,098	629		(629)
367.10	586,083	248,618		(248,618)
367.20	65,120	2,137		(2,137)
369.00	72,747	57,991		(57,991)
374.10	5,123	10,245	651	(9,595)
374.20	81,963	79,750		(79,750)
375.00	67,327	48,887	7	(48,881)
376.10	2,037,997	1,379,529	12,218	(1,367,311)
376.20	20,586	1,616		(1,616)
378.00	57,081	15,645		(15,645)
380.00	1,192,485	225,196		(225,196)
385.00	92,574	57,767	2	(57,766)
390.11				
TOTAL	**4,369,956**	**2,139,481**	**12,876**	**(2,126,604)**
TOTAL	**29,812,919**	**9,524,903**	**45,701**	**(9,479,203)**

NATIONAL FUEL EXHIBIT C

DEPRECIATION STUDY - FTY

2026 DEPRECIATION STUDY

CALCULATED ANNUAL DEPRECIATION
ACCRUALS RELATED TO GAS PLANT
AS OF SEPTEMBER 30, 2026

Prepared by:

GANNETT FLEMING VALUATION AND RATE CONSULTANTS LLC

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

PENNSYLVANIA DIVISION

Erie, Pennsylvania

2026 DEPRECIATION STUDY

CALCULATED ANNUAL DEPRECIATION ACCRUALS
RELATED TO GAS PLANT
AS OF SEPTEMBER 30, 2026

GANNETT FLEMING VALUATION AND RATE CONSULTANTS, LLC

Mechanicsburg, Pennsylvania

Gannett Fleming Valuation and Rate Consultants, LLC
(a GFT Company)

300 Sterling Parkway, Suite 200
Mechanicsburg, PA 17050
717.763.7211

January 13, 2026

National Fuel Gas Distribution Corporation
6363 Main Street
Williamsville, NY 14221-5887

Attention Brian M. Welsch
Vice President

Ladies and Gentlemen:

Pursuant to your request, we have determined the annual depreciation accruals applicable to gas plant in service. The results of our study as of September 30, 2026 are presented in the attached report. The results of our study as of September 30, 2025 are presented in our report titled "2025 Depreciation Study- Calculated Annual Depreciation Accruals Related to Gas Plant as of September 30, 2025". The same methods, procedures and estimates are used in both studies.

The attached report sets forth a description of the methods and procedures upon which the studies were based, the estimates of survivor curves and the calculated annual depreciation rates as of September 30, 2026.

Respectfully submitted,

GANNETT FLEMING VALUATION
AND RATE CONSULTANTS, LLC

JOHN J. SPANOS
President

MELISSA M. HOWARD
Project Manager

084506.100

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PART I. INTRODUCTION

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

PENNSYLVANIA DIVISION

DEPRECIATION STUDY

PART I. INTRODUCTION

SCOPE

This report sets forth the results of the depreciation study conducted for National Fuel Gas Distribution Corporation – Pennsylvania Division to determine the annual depreciation accrual rates and amounts for ratemaking purposes applicable to the original cost of gas plant as of September 30, 2026.

The depreciation accrual rates and amounts presented herein are based on estimated survivor curves and methods and procedures set forth in previous orders approved by the Pennsylvania Public Utility Commission. The estimated survivor curves presented herein were based on the results of a service life study incorporating statistical analyses of data through 2022.

BASIS OF STUDY

Depreciation and Amortization

Depreciation, as defined in the Uniform System of Accounts, is the loss in service value not restored by current maintenance, incurred in connection with the consumption or prospective retirement of gas plant in the course of service from causes which are known to be in current operation and against which the utility is not protected by insurance. Among the causes to be given consideration are wear and tear, decay, action of the elements, inadequacy, obsolescence, changes in the art, changes in demand, and requirements of public authorities.

Depreciation, as used in accounting, is a method of distributing fixed capital costs over a period of time by allocating annual amounts to expense. Each annual amount of such depreciation expense is part of that year's total cost of providing utility service. Normally, the period of time over which the fixed capital cost is allocated to the cost of service is equal to the period of time over which an item renders service, that is, the item's service life. The most prevalent method of allocation is to distribute an equal amount of cost to each year of service life. This method is known as the straight line method of depreciation.

The calculation of annual and accrued depreciation based on the straight line method requires the estimation of survivor curves and the selection of group depreciation procedures. These subjects are discussed in the sections which follow.

For most plant accounts, depreciation accruals and accrued depreciation were calculated using the straight line method, the remaining life basis, the average service life (ASL) procedure for plant installed prior to 1982 and the equal life group (ELG) procedure for 1982 and subsequent vintages. The calculations were based on the attained ages and estimated service life characteristics for each depreciable group of gas property. For certain general plant accounts, the amortization amounts, annual and accrued, were based on the age of the vintage and the selected amortization period.

Survivor curves were used to reflect the expected dispersion of retirements, thus providing a consistent method of estimating service lives and depreciation for mass property. Iowa type curves were used to depict the estimated survivor curves. For life span groups, the estimate of life characteristics is consistent because the calculated lives of the units within a group are obtained by employing a single probable retirement date for the entire group.

Service Life Estimates

The method of estimating service life consisted of compiling the service life history of the plant accounts, subaccounts or depreciable groups, reducing this history to trends through the use of acceptable actuarial techniques, and forecasting the trend of survivors for each depreciable group on the basis of interpretations of past trends and consideration of Company plans for the future. The combination of the historical trend and the estimated future trend yielded a complete pattern of life characteristics from which the average service life was derived.

The Company's service life estimates used in the depreciation calculation incorporated historical data compiled through 2022 from the property records of the Company. Such data included plant additions, retirements, transfers and other activity. The period of experience studied and the method of historical analysis used for each group depended upon the availability of data from the Company's records.

A general understanding of the function of the plant and information with respect to the reasons for past retirements and the expected future causes of retirement was obtained through field trips conducted during the course of the service life study. Discussions with operating and management personnel also provided information regarding plans for the future which were incorporated in the interpretation and extrapolation of the statistical analyses.

AMORTIZATION OF NET SALVAGE

Inasmuch as this report relates primarily to Pennsylvania rate regulation practices, under which experienced costs of negative net salvage are amortized after their occurrence, no adjustments for expected net salvage were made to either the annual depreciation accrual or the calculated accrued depreciation for the individual accounts. The annual provision for recovering negative net salvage is based on the amortization of net

salvage over a five-year period, as established in the Stipulation and Commission order at Docket No. R-832469.

PART II. ESTIMATION OF SURVIVOR CURVES

PART II. ESTIMATION OF SURVIVOR CURVES

The calculation of annual depreciation based on the straight line method requires the estimation of survivor curves and the selection of group depreciation procedures. The estimation of survivor curves is discussed below, and the development of net salvage is discussed in later sections of this report.

SURVIVOR CURVES

The use of an average service life for a property group implies that the various units in the group have different lives. Thus, the average life may be obtained by determining the separate lives of each of the units or by constructing a survivor curve by plotting the number of units which survive at successive ages.

The survivor curve graphically depicts the amount of property existing at each age throughout the life of an original group. From the survivor curve, the average life of the group, the remaining life expectancy, the probable life, and the frequency curve can be calculated. In Figure 1, a typical smooth survivor curve and the derived curves are illustrated. The average life is obtained by calculating the area under the survivor curve, from age zero to the maximum age, and dividing this area by the ordinate at age zero. The remaining life expectancy at any age can be calculated by obtaining the area under the curve, from the observation age to the maximum age, and dividing this area by the percent surviving at the observation age. For example, in Figure 1, the remaining life at age 30 is equal to the crosshatched area under the survivor curve divided by 29.5 percent surviving at age 30. The probable life at any age is developed by adding the age and remaining life. If the probable life of the property is calculated for each year of age, the probable life curve shown in the chart can be developed. The frequency curve presents the number of units retired in each age interval. It is derived by obtaining the differences between the amount of property surviving at the beginning and at the end of each interval.

This study has incorporated the use of Iowa curves developed from a retirement rate analysis of historical retirement history. A discussion of the concepts of survivor curves and of the development of survivor curves using the retirement rate method is presented below.

Iowa Type Curves

The range of survivor characteristics usually experienced by utility and industrial properties is encompassed by a system of generalized survivor curves known as the Iowa type curves. There are four families in the Iowa system, labeled in accordance with the location of the modes of the retirements (or the portion of the frequency curve with the highest level of retirements) in relationship to the average life and the relative height of the modes. The left moded curves, presented in Figure 2, are those in which the greatest frequency of retirement occurs to the left of, or prior to, average service life. The symmetrical moded curves, presented in Figure 3, are those in which the greatest frequency of retirement occurs at average service life. The right moded curves, presented in Figure 4, are those in which the greatest frequency occurs to the right of, or after, average service life. The origin moded curves, presented in Figure 5, are those in which the greatest frequency of retirement occurs at the origin, or immediately after age zero. The letter designation of each family of curves (L, S, R or O) represents the location of the mode of the associated frequency curve with respect to the average service life. The numbers represent the relative heights of the modes of the frequency curves within each family. A higher number designates a higher mode curve.

The Iowa curves were developed at the Iowa State College Engineering Experiment Station through an extensive process of observation and classification of the ages at which industrial property had been retired. A report of the study which resulted in the classification of property survivor characteristics into 18 type curves, which constitute three of the four families, was published in 1935 in the form of the Experiment Station's Bulletin 125.

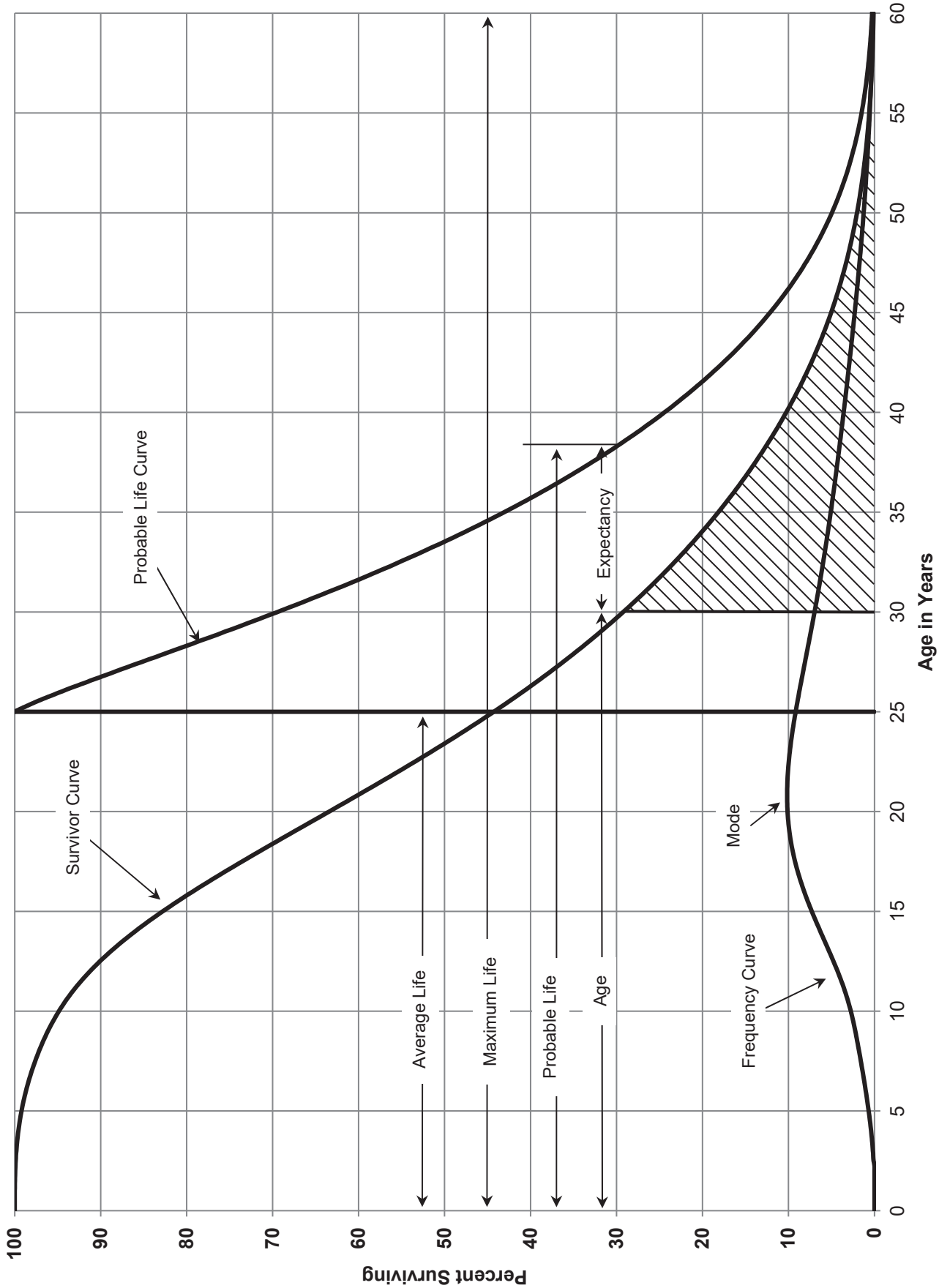


FIGURE 1. TYPICAL SURVIVOR CURVE AND DERIVED CURVES

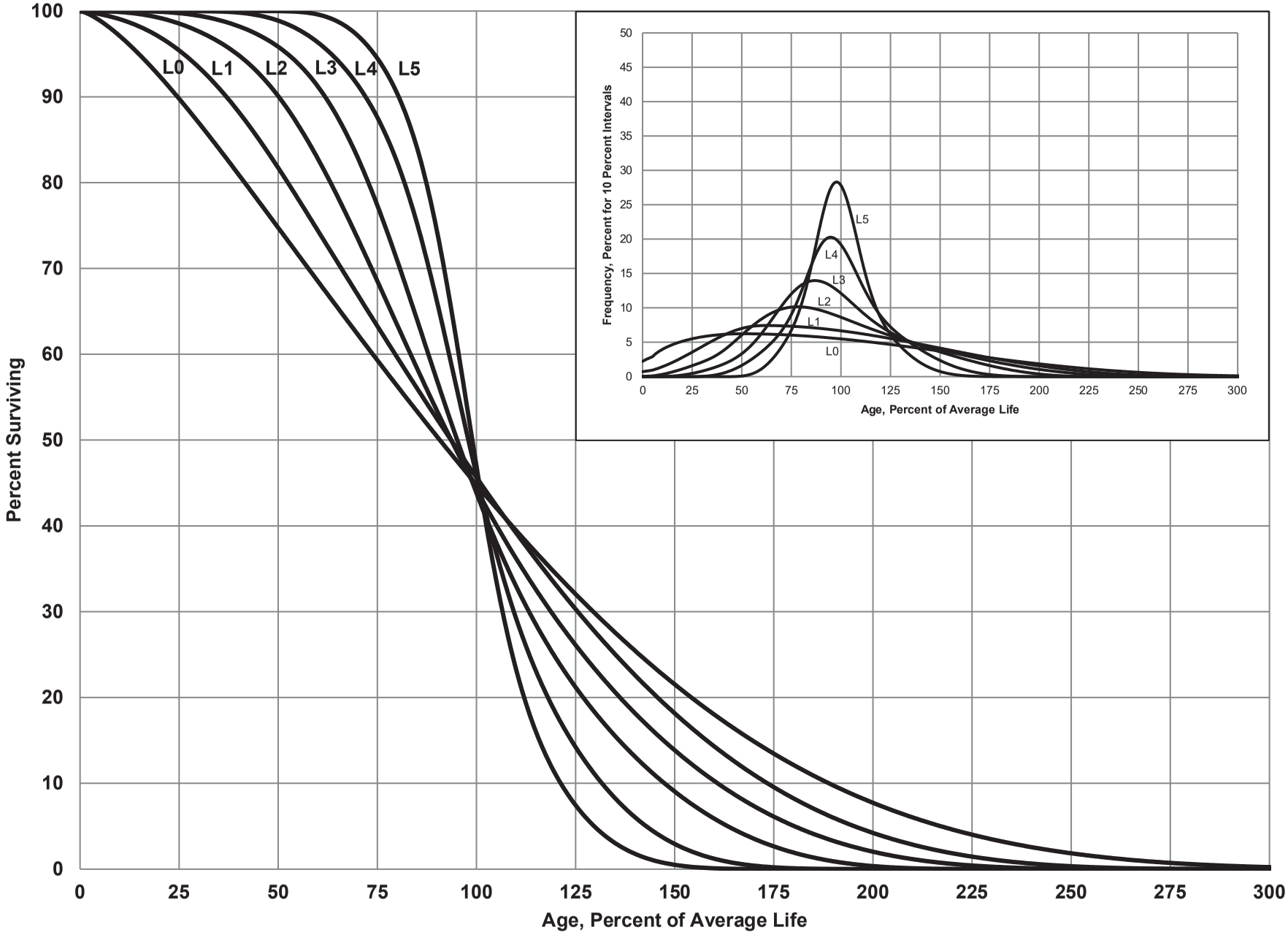


FIGURE 2. LEFT MODAL OR "L" IOWA TYPE SURVIVOR CURVES

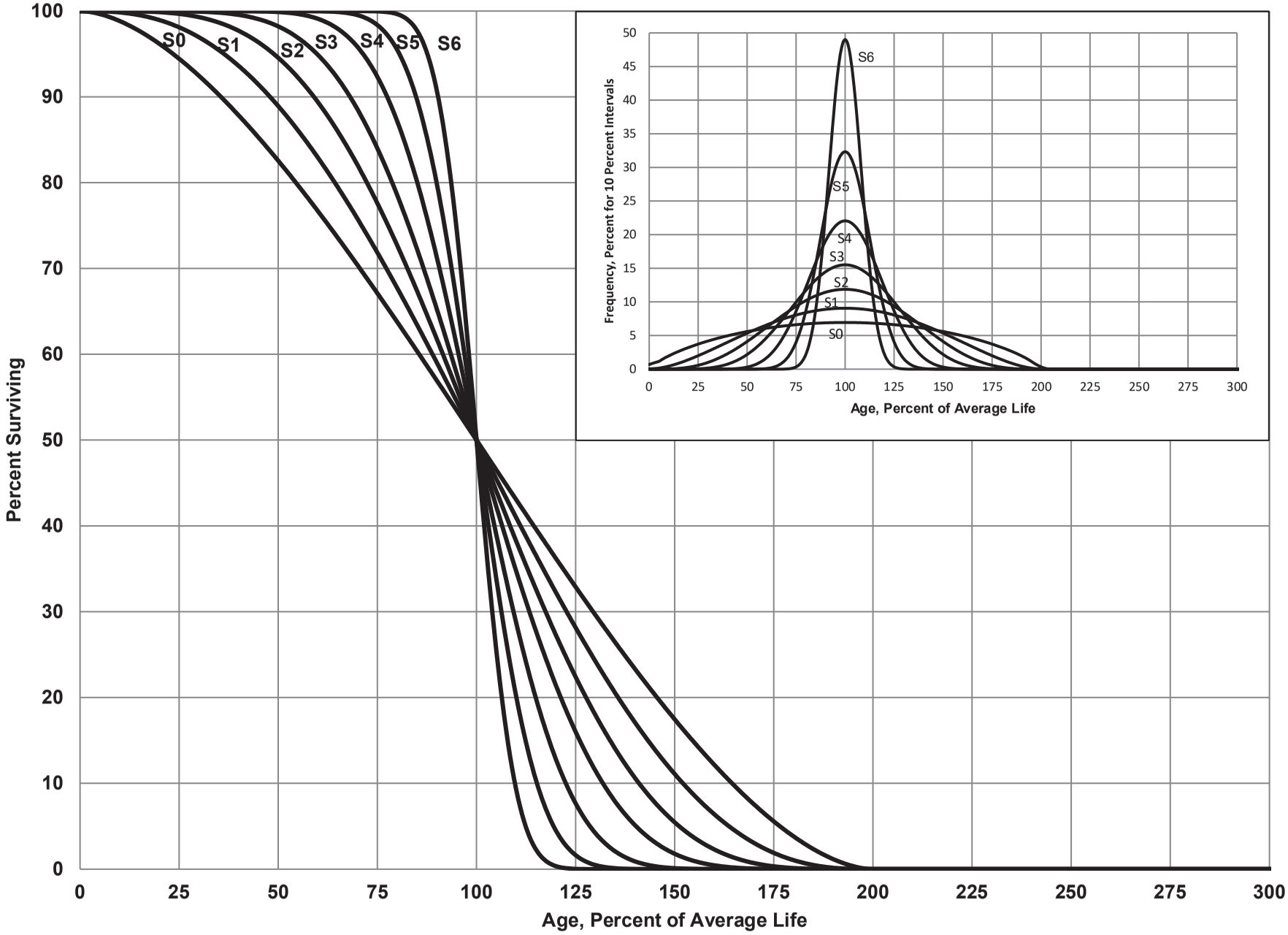


FIGURE 3. SYMMETRICAL OR "S" IOWA TYPE SURVIVOR CURVES

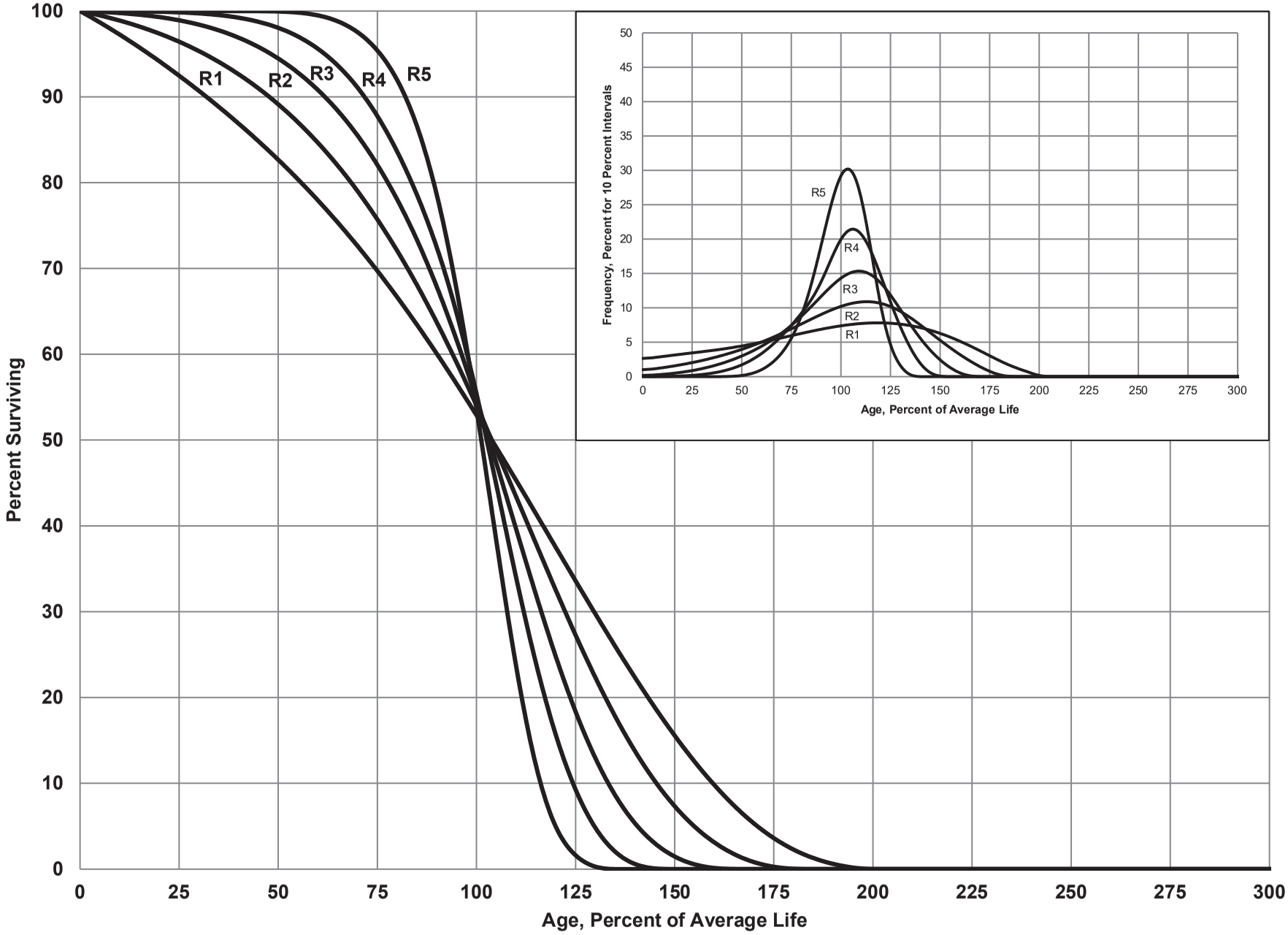


FIGURE 4. RIGHT MODAL OR "R" IOWA TYPE SURVIVOR CURVES

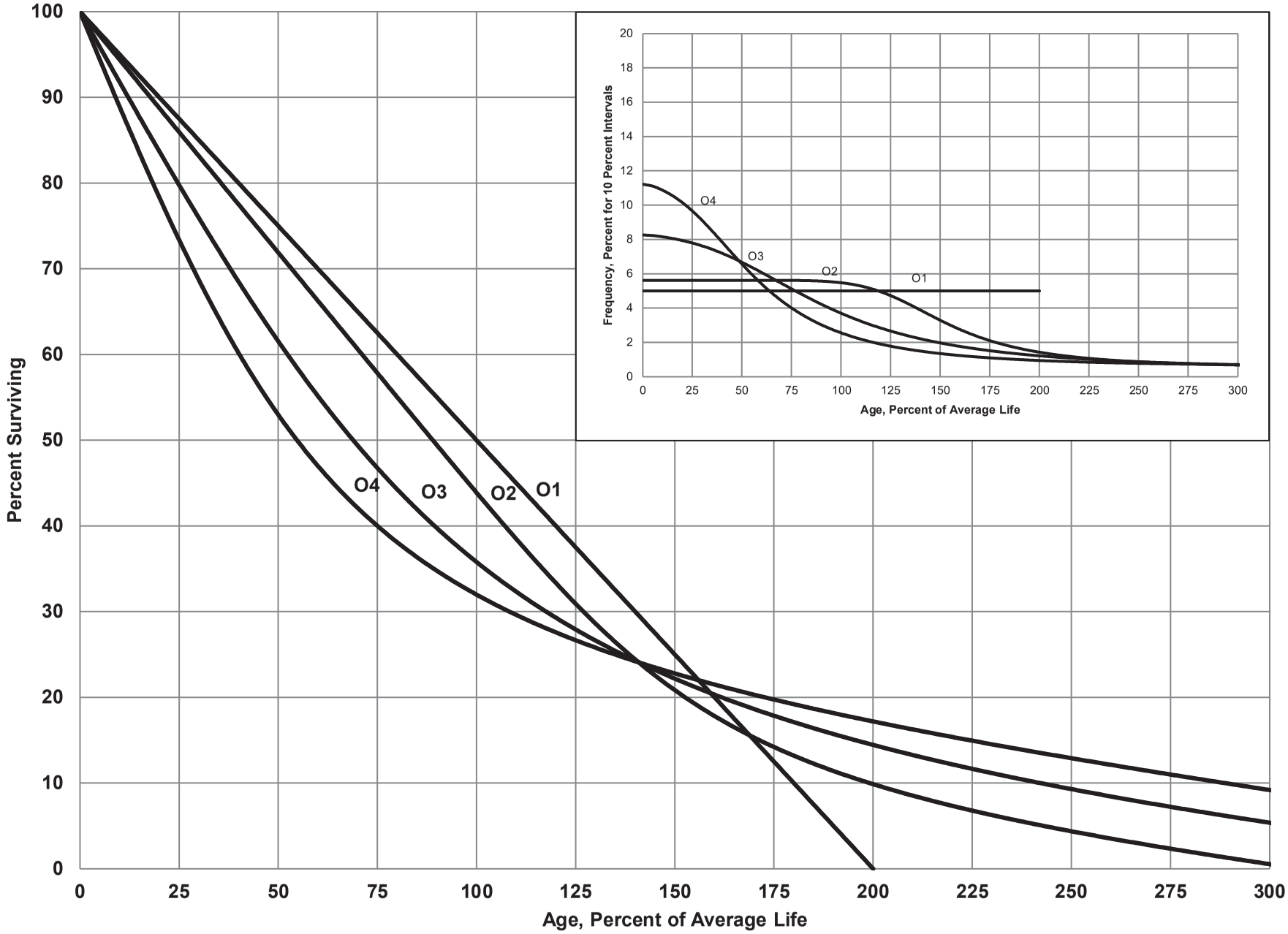


FIGURE 5. ORIGIN MODAL OR "O" IOWA TYPE SURVIVOR CURVES

These curve types have also been presented in subsequent Experiment Station bulletins and in the text, "Engineering Valuation and Depreciation."[1] In 1957, Frank V. B. Couch, Jr., an Iowa State College graduate student, submitted a thesis presenting his development of the fourth family consisting of the four O type survivor curves.

Retirement Rate Method of Analysis

The retirement rate method is an actuarial method of deriving survivor curves using the average rates at which property of each age group is retired. The method relates to property groups for which aged accounting experience is available and is the method used to develop the original stub survivor curves in this study. The method (also known as the annual rate method) is illustrated through the use of an example in the following text and is also explained in several publications including "Statistical Analyses of Industrial Property Retirements,"[2] "Engineering Valuation and Depreciation,"[3] and "Depreciation Systems."[4]

The average rate of retirement used in the calculation of the percent surviving for the survivor curve (life table) requires two sets of data: first, the property retired during a period of observation, identified by the property's age at retirement; and second, the property exposed to retirement at the beginning of the age intervals during the same period. The period of observation is referred to as the experience band. The band of years which represent the installation dates of the property exposed to retirement during the experience band is referred to as the placement band. An example of the calculations used in the development of a life table follows. The example includes schedules of annual aged property transactions, a schedule of plant exposed to retirement, a life table and illustrations of smoothing the stub survivor curve.

[1]Marston, Anson, Robley Winfrey and Jean C. Hempstead. Engineering Valuation and Depreciation, 2nd Edition. New York, McGraw-Hill Book Company. 1953.

[2]Winfrey, Robley, Statistical Analyses of Industrial Property Retirements. Iowa State College, Engineering Experiment Station, Bulletin 125. 1935.

[3]Marston, Anson, Robley Winfrey, and Jean C. Hempstead, Supra Note 1.

[4]Wolf, Frank K. and W. Chester Fitch. Depreciation Systems. Iowa State University Press. 1994.

Schedules of Annual Transactions in Plant Records

The property group used to illustrate the retirement rate method is observed for the experience band 2016-2025 for which there were placements during the years 2011-2025. In order to illustrate the summation of the aged data by age interval, the data were compiled in the manner presented in Schedules 1 and 2 on pages II-11 and II-12. In Schedule 1, the year of installation (year placed) and the year of retirement are shown. The age interval during which a retirement occurred is determined from this information. In the example which follows, $10,000 of the dollars invested in 2010 were retired in 2016. The $10,000 retirement occurred during the age interval between 4½ and 5½ years on the basis that approximately one-half of the amount of property was installed prior to and subsequent to July 1 of each year. That is, on the average, property installed during a year is placed in service at the midpoint of the year for the purpose of the analysis. All retirements also are stated as occurring at the midpoint of a one-year age interval of time, except the first age interval which encompasses only one-half year.

The total retirements occurring in each age interval in a band are determined by summing the amounts for each transaction year-installation year combination for that age interval. For example, the total of $143,000 retired for age interval 4½-5½ is the sum of the retirements entered on Schedule 1 immediately above the stair step line drawn on the table beginning with the 2016 retirements of 2011 installations and ending with the 2025 retirements of the 2020 installations. Thus, the total amount of 143 for age interval 4½-5½ equals the sum of:

10 + 12 + 13 + 11 + 13 + 13 + 15 + 17 + 19 + 20.

SCHEDULE 1. RETIREMENTS FOR EACH YEAR 2016-2025
SUMMARIZED BY AGE INTERVAL

Experience Band 2016-2025 Placement Band 2011-2025

Year Placed	Retirements, Thousands of Dollars During Year										Total During Age Interval	Age Interval
	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
2011	10	11	12	13	14	16	23	24	25	26	26	13½-14½
2012	11	12	13	15	16	18	20	21	22	19	44	12½-13½
2013	11	12	13	14	16	17	19	21	22	18	64	11½-12½
2014	8	9	10	11	11	13	14	15	16	17	83	10½-11½
2015	9	10	11	12	13	14	16	17	19	20	93	9½-10½
2016	4	9	10	11	12	13	14	15	16	20	105	8½-9½
2017		5	11	12	13	14	15	16	18	20	113	7½-8½
2018			6	12	13	15	16	17	19	19	124	6½-7½
2019				6	13	15	16	17	19	19	131	5½-6½
2020					7	14	16	17	19	20	143	4½-5½
2021						8	18	20	22	23	146	3½-4½
2022							9	20	22	25	150	2½-3½
2023								11	23	25	151	1½-2½
2024									11	24	153	½-1½
2025										13	80	0-½
Total	53	68	86	106	128	157	196	231	273	308	1,606	

SCHEDULE 2. OTHER TRANSACTIONS FOR EACH YEAR 2015-2024
SUMMARIZED BY AGE INTERVAL

Experience Band 2016-2025 Placement Band 2011-2025

Year Placed	Acquisitions, Transfers and Sales, Thousands of Dollars During Year										Total During Age Interval	Age Interval
	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
2011	-	-	-	-	-	-	60[a]	-	-	-	-	13½-14½
2012	-	-	-	-	-	-	-	-	-	-	-	12½-13½
2013	-	-	-	-	-	-	-	-	-	-	-	11½-12½
2014	-	-	-	-	-	-	-	(5)[b]	-	-	60	10½-11½
2015	-	-	-	-	-	-	-	6[a]	-	-	-	9½-10½
2016	-	-	-	-	-	-	-	-	-	-	(5)	8½-9½
2017		-	-	-	-	-	-	-	-	-	6	7½-8½
2018			-	-	-	-	-	-	-	-	-	6½-7½
2019				-	-	-	-	(12)[b]	-	-	-	5½-6½
2020					-	-	-	-	22[a]	-	-	4½-5½
2021						-	-	(19)[b]	-	-	10	3½-4½
2022							-	-	-	-	-	2½-3½
2023								-	-	(102)[c]	(121)	1½-2½
2024									-	-	-	½-1½
2025											-	0-½
Total	-	-	-	-	-	-	60	(30)	22	(102)	(50)	

[a] Transfer Affecting Exposures at Beginning of Year
[b] Transfer Affecting Exposures at End of Year
[c] Sale with Continued Use
Parentheses Denote Credit Amount.

In Schedule 2, other transactions which affect the group are recorded in a similar manner. The entries illustrated include transfers and sales. The entries which are credits to the plant account are shown in parentheses. The items recorded on this schedule are not totaled with the retirements, but are used in developing the exposures at the beginning of each age interval.

Schedule of Plant Exposed to Retirement

The development of the amount of plant exposed to retirement at the beginning of each age interval is illustrated in Schedule 3 on page II-14. The surviving plant at the beginning of each year from 2016 through 2025 is recorded by year in the portion of the table headed "Annual Survivors at the Beginning of the Year." The last amount entered in each column is the amount of new plant added to the group during the year. The amounts entered in Schedule 3 for each successive year following the beginning balance or addition are obtained by adding or subtracting the net entries shown on Schedules 1 and 2. For the purpose of determining the plant exposed to retirement, transfers-in are considered as being exposed to retirement in this group at the beginning of the year in which they occurred, and the sales and transfers-out are considered to be removed from the plant exposed to retirement at the beginning of the following year. Thus, the amounts of plant shown at the beginning of each year are the amounts of plant from each placement year considered to be exposed to retirement at the beginning of each successive transaction year. For example, the exposures for the installation year 2021 are calculated in the following manner:

Exposures at age 0	= amount of addition	= $750,000
Exposures at age ½	= $750,000 - $ 8,000	= $742,000
Exposures at age 1½	= $742,000 - $18,000	= $724,000
Exposures at age 2½	= $724,000 - $20,000 - $19,000	= $685,000
Exposures at age 3½	= $685,000 - $22,000	= $663,000

SCHEDULE 3. PLANT EXPOSED TO RETIREMENT
JANUARY 1 OF EACH YEAR 2016-2025
SUMMARIZED BY AGE INTERVAL

Experience Band 2016-2025

Placement Band 2011-2025

Year Placed	Exposures, Thousands of Dollars Annual Survivors at the Beginning of the Year 2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	Total at Beginning of Age Interval	Age Interval
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)
2011	255	245	234	222	209	195	239	216	192	167	167	13½-14½
2012	279	268	256	243	228	212	194	174	153	131	323	12½-13½
2013	307	296	284	271	257	241	224	205	184	162	531	11½-12½
2014	338	330	321	311	300	289	276	262	242	226	823	10½-11½
2015	376	367	357	346	334	321	307	297	280	261	1,097	9½-10½
2016	420[a]	416	407	397	386	374	361	347	332	316	1,503	8½-9½
2017		460[a]	455	444	432	419	405	390	374	356	1,952	7½-8½
2018			510[a]	504	492	479	464	448	431	412	2,463	6½-7½
2019				580[a]	574	561	546	530	501	482	3,057	5½-6½
2020					660[a]	653	639	623	628	609	3,789	4½-5½
2021						750[a]	742	724	685	663	4,332	3½-4½
2022							850[a]	841	821	799	4,955	2½-3½
2023								960[a]	949	926	5,719	1½-2½
2024									1,080[a]	1,069	6,579	½-1½
2025										1,220[a]	7,490	0-½
Total	1,975	2,382	2,824	3,318	3,872	4,494	5,247	6,017	6,852	7,799	44,780	

[a]Additions during the year

For the entire experience band 2016-2025, the total exposures at the beginning of an age interval are obtained by summing diagonally in a manner similar to the summing of the retirements during an age interval (Schedule 1). For example, the figure of 3,789, shown as the total exposures at the beginning of age interval 4½-5½, is obtained by summing:

255 + 268 + 284 + 311 + 334 + 374 + 405 + 448 + 501 + 609.

Original Life Table

The original life table, illustrated in Schedule 4 on page II-16, is developed from the totals shown on the schedules of retirements and exposures, Schedules 1 and 3, respectively. The exposures at the beginning of the age interval are obtained from the corresponding age interval of the exposure schedule, and the retirements during the age interval are obtained from the corresponding age interval of the retirement schedule. The retirement ratio is the result of dividing the retirements during the age interval by the exposures at the beginning of the age interval. The percent surviving at the beginning of each age interval is derived from survivor ratios, each of which equals one minus the retirement ratio. The percent surviving is developed by starting with 100% at age zero and successively multiplying the percent surviving at the beginning of each interval by the survivor ratio, i.e., one minus the retirement ratio for that age interval. The calculations necessary to determine the percent surviving at age 5½ are as follows:

Percent surviving at age 4½	=	88.15				
Exposures at age 4½	=	3,789,000				
Retirements from age 4½ to 5½	=	143,000				
Retirement Ratio	=	143,000	÷	3,789,000	=	0.0377
Survivor Ratio	=	1.000	-	0.0377	=	0.9623
Percent surviving at age 5½	=	(88.15)	x	(0.9623)	=	84.83

The totals of the exposures and retirements (columns 2 and 3) are shown for the purpose of checking with the respective totals in Schedules 1 and 3. The ratio of the total retirements to the total exposures, other than for each age interval, is meaningless.

SCHEDULE 4. ORIGINAL LIFE TABLE
CALCULATED BY THE RETIREMENT RATE METHOD

Experience Band 2016-2025 Placement Band 2011-2025

(Exposure and Retirement Amounts are in Thousands of Dollars)

Age at Beginning of Interval	Exposures at Beginning of Age Interval	Retirements During Age Interval	Retirement Ratio	Survivor Ratio	Percent Surviving at Beginning of Age Interval
(1)	(2)	(3)	(4)	(5)	(6)
0.0	7,490	80	0.0107	0.9893	100.00
0.5	6,579	153	0.0233	0.9767	98.93
1.5	5,719	151	0.0264	0.9736	96.62
2.5	4,955	150	0.0303	0.9697	94.07
3.5	4,332	146	0.0337	0.9663	91.22
4.5	3,789	143	0.0377	0.9623	88.15
5.5	3,057	131	0.0429	0.9571	84.83
6.5	2,463	124	0.0503	0.9497	81.19
7.5	1,952	113	0.0579	0.9421	77.11
8.5	1,503	105	0.0699	0.9301	72.65
9.5	1,097	93	0.0848	0.9152	67.57
10.5	823	83	0.1009	0.8991	61.84
11.5	531	64	0.1205	0.8795	55.60
12.5	323	44	0.1362	0.8638	48.90
13.5	167	26	0.1557	0.8443	42.24
					35.66
Total	44,780	1,606			

Column 2 from Schedule 3, Column 12, Plant Exposed to Retirement.
Column 3 from Schedule 1, Column 12, Retirements for Each Year.
Column 4 = Column 3 Divided by Column 2.
Column 5 = 1.0000 Minus Column 4.
Column 6 = Column 5 Multiplied by Column 6 as of the Preceding Age Interval.

The original survivor curve is plotted from the original life table (column 6, Schedule 4). When the curve terminates at a percent surviving greater than zero, it is called a stub survivor curve. Survivor curves developed from retirement rate studies generally are stub curves.

Smoothing the Original Survivor Curve

The smoothing of the original survivor curve eliminates any irregularities and serves as the basis for the preliminary extrapolation to zero percent surviving of the original stub curve. Even if the original survivor curve is complete from 100% to zero percent, it is desirable to eliminate any irregularities, as there is still an extrapolation for the vintages which have not yet lived to the age at which the curve reaches zero percent. In this study, the smoothing of the original curve with established type curves was used to eliminate irregularities in the original curve.

The Iowa type curves are used in this study to smooth those original stub curves which are expressed as percents surviving at ages in years. Each original survivor curve was compared to the Iowa curves using visual and mathematical matching in order to determine the better fitting smooth curves. In Figures 6, 7, and 8, the original curve developed in Schedule 4 is compared with the L, S, and R Iowa type curves which most nearly fit the original survivor curve. In Figure 6, the L1 curve with an average life between 12 and 13 years appears to be the best fit. In Figure 7, the S0 type curve with a 12-year average life appears to be the best fit and appears to be better than the L1 fitting. In Figure 8, the R1 type curve with a 12-year average life appears to be the best fit and appears to be better than either the L1 or the S0.

In Figure 9, the three fittings, 12-L1, 12-S0 and 12-R1 are drawn for comparison purposes. It is probable that the 12-R1 Iowa curve would be selected as the most representative of the plotted survivor characteristics of the group.

FIGURE 6. ILLUSTRATION OF THE MATCHING OF AN ORIGINAL SURVIVOR CURVE WITH AN L1 IOWA TYPE CURVE
ORIGINAL AND SMOOTH SURVIVOR CURVES

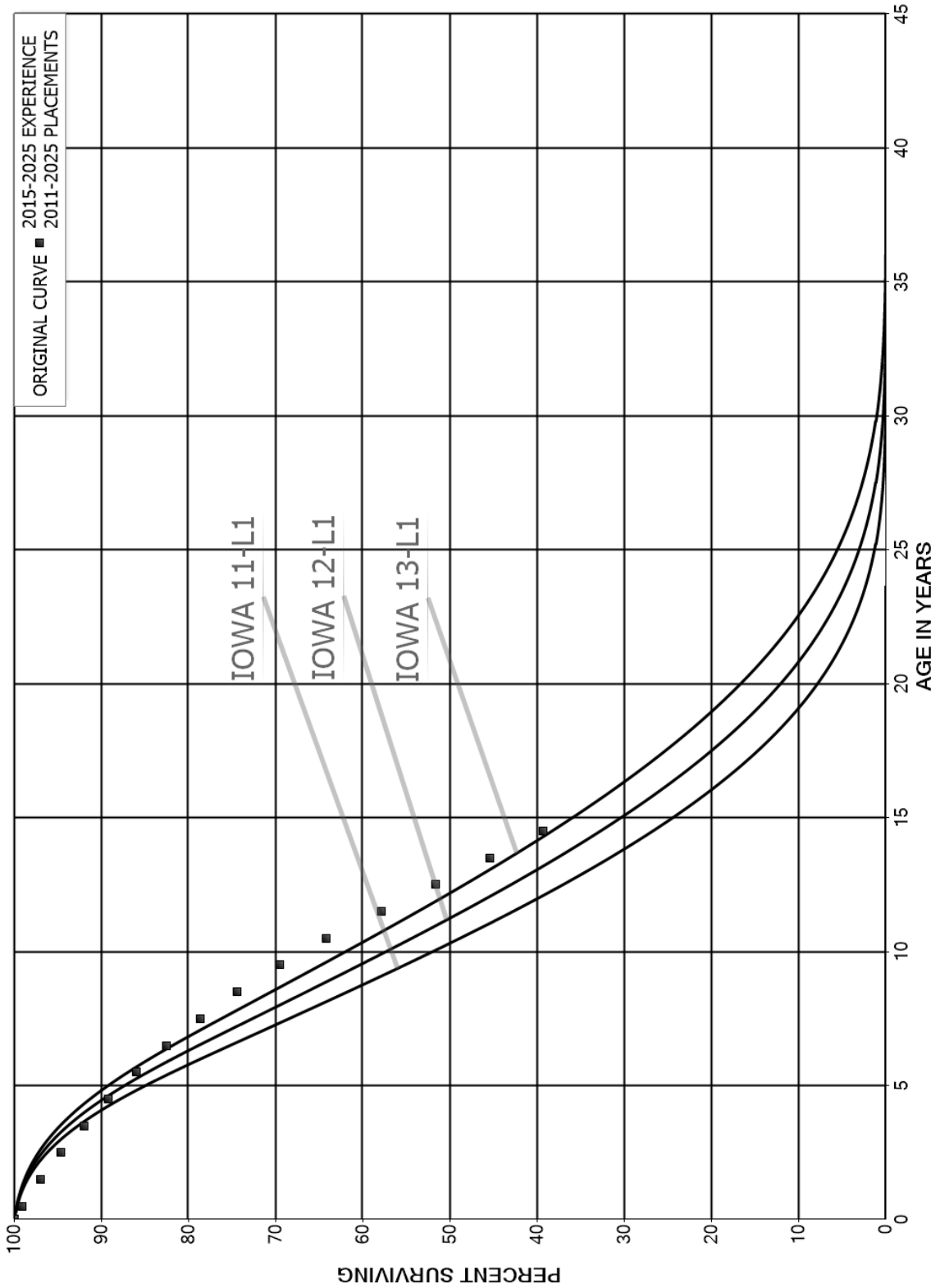


FIGURE 7. ILLUSTRATION OF THE MATCHING OF AN ORIGINAL SURVIVOR CURVE WITH AN S0 IOWA TYPE CURVE
ORIGINAL AND SMOOTH SURVIVOR CURVES

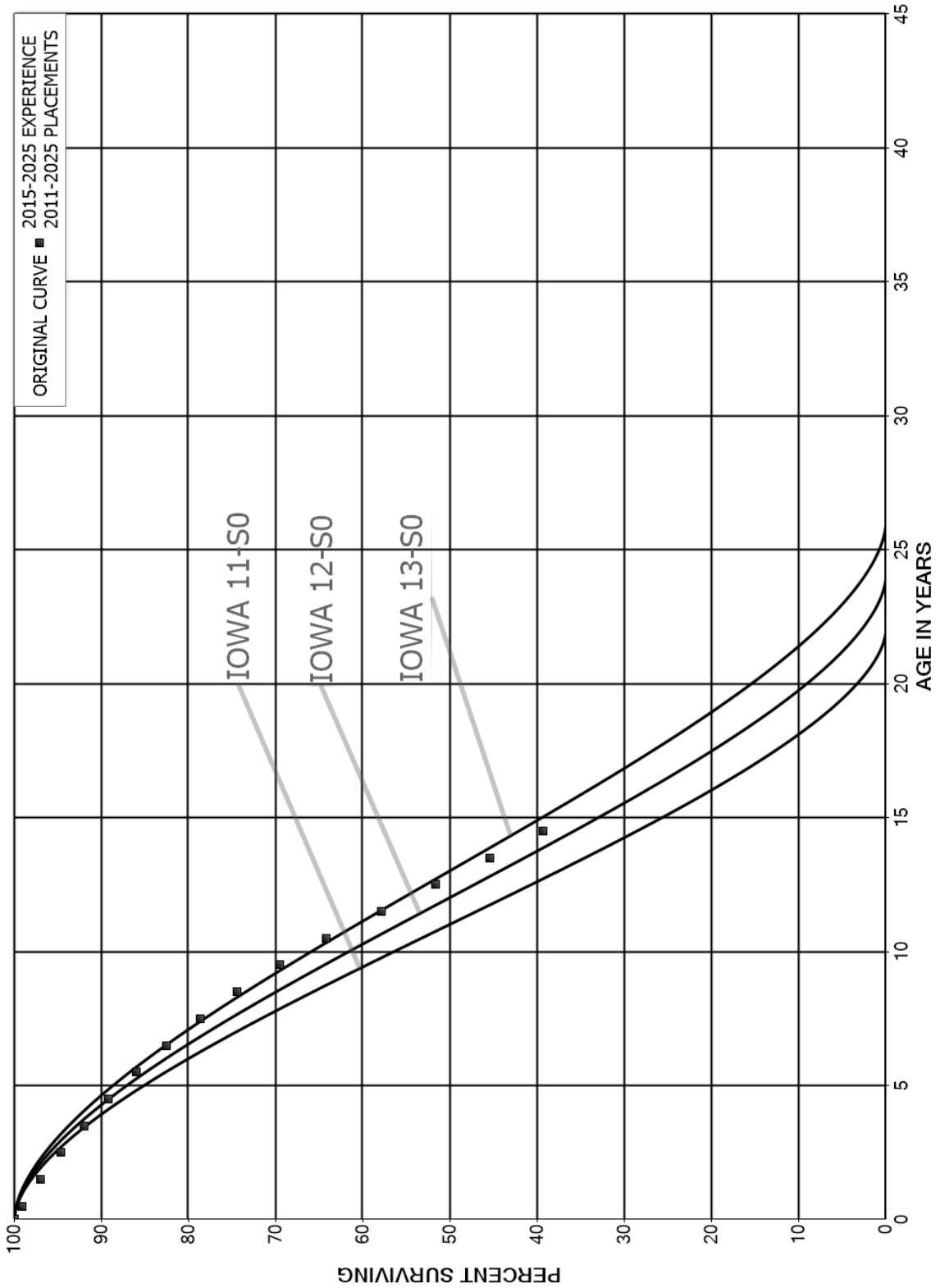


FIGURE 8. ILLUSTRATION OF THE MATCHING OF AN ORIGINAL SURVIVOR CURVE WITH AN R1 IOWA TYPE CURVE
ORIGINAL AND SMOOTH SURVIVOR CURVES

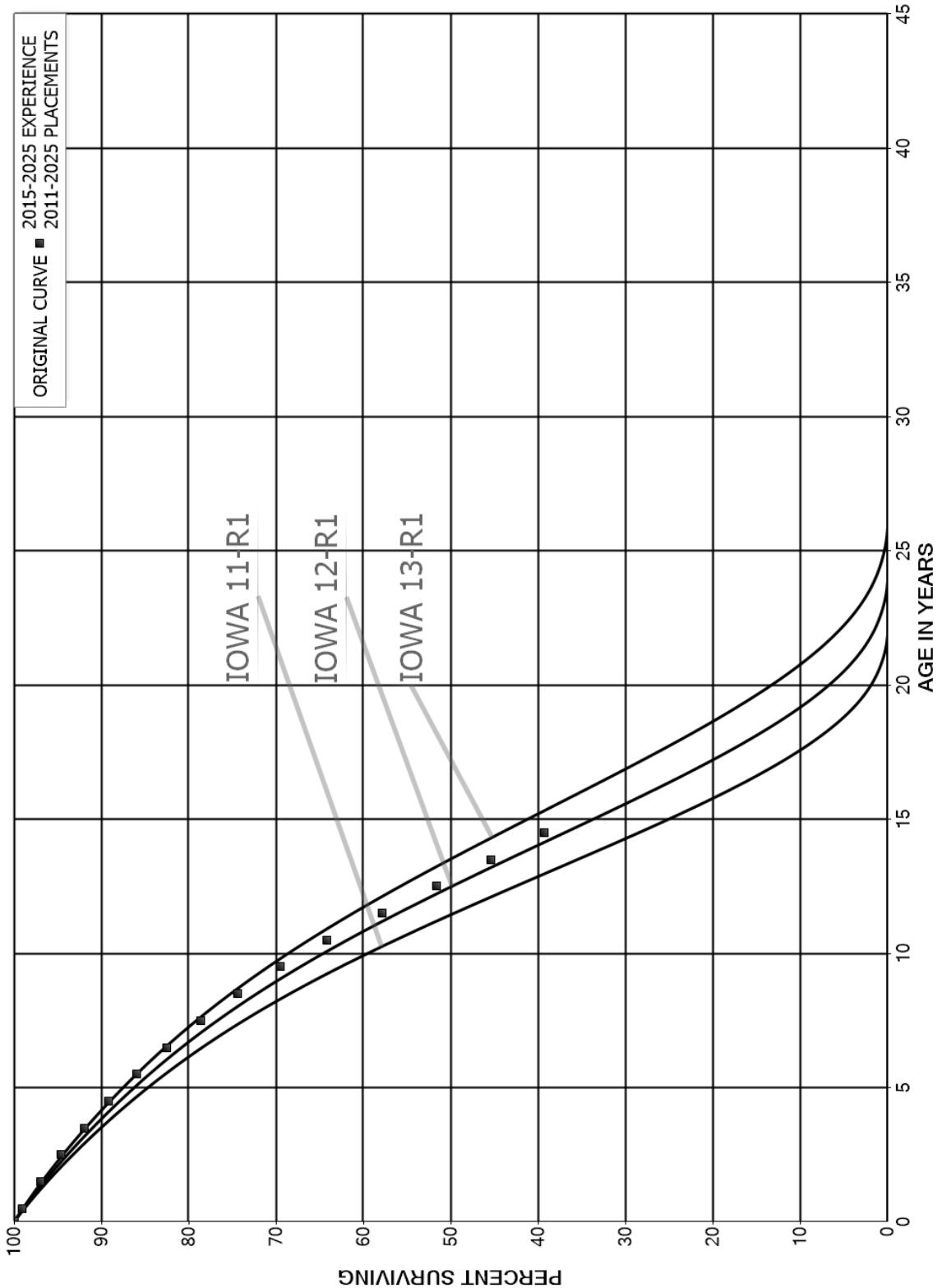
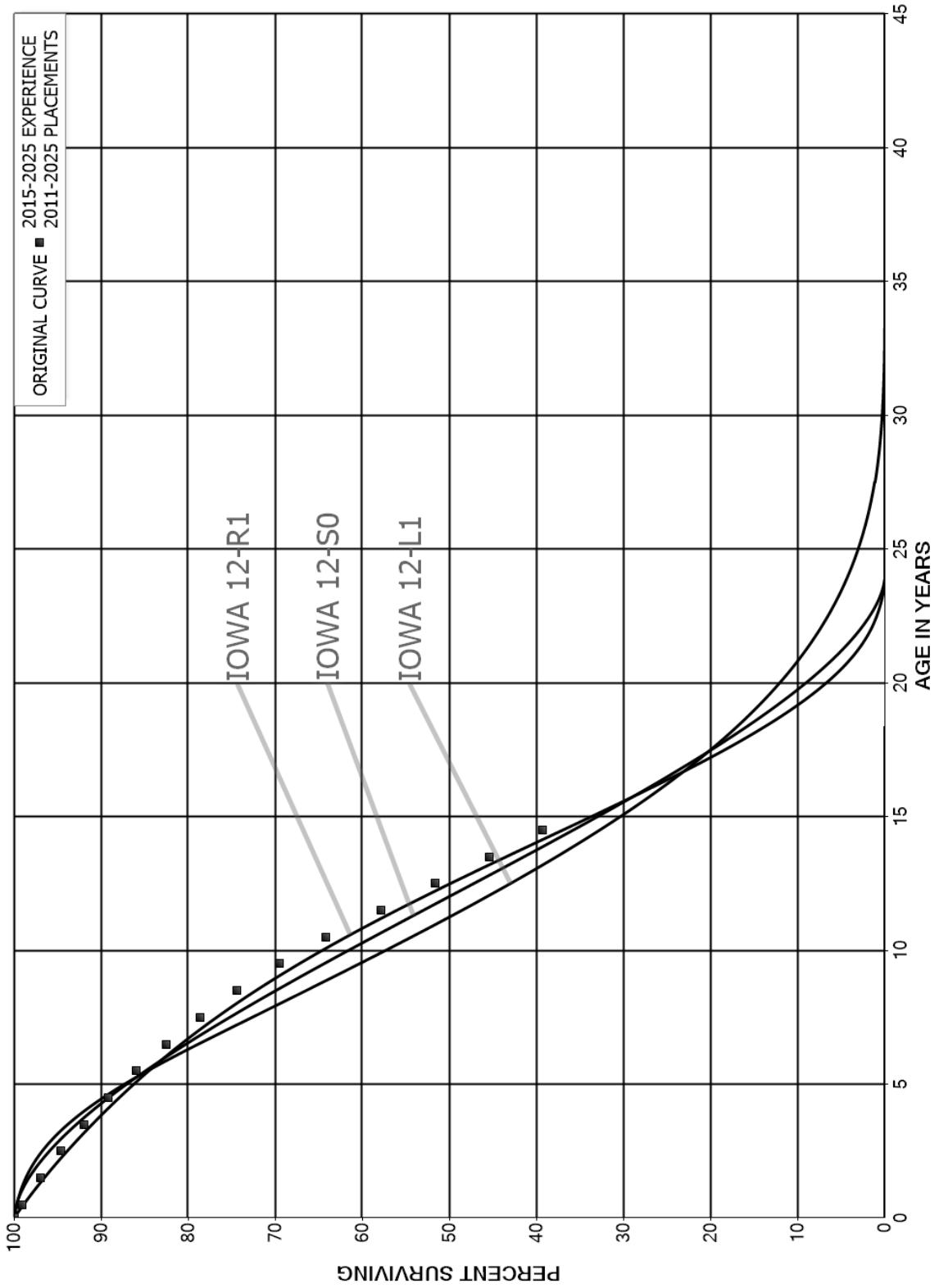


FIGURE 9. ILLUSTRATION OF THE MATCHING OF AN ORIGINAL SURVIVOR CURVE WITH AN L1, S0 AND R1 IOWA TYPE CURVE
ORIGINAL AND SMOOTH SURVIVOR CURVES



PART III. SERVICE LIFE CONSIDERATIONS

PART III. SERVICE LIFE CONSIDERATIONS

Field Trips

In order to be familiar with the operation of the Company and observe representative portions of the plant, field trips have been conducted periodically. A general understanding of the function of the plant and information with respect to the reasons for past retirements and the expected future causes of retirements are obtained during these field trips. This knowledge and information were incorporated in the interpretation and extrapolation of the statistical analyses.

The following is a list of the locations visited during the most recent trips.

April 25, 2018

Erie Service Center
Erie District Regulating Station 1030
Erie District Regulating Station 36 (26th and Ash Streets)
VA Hospital Meter Set
Pittsburgh Avenue City Gate Station (ERE 64)
Owl Creek FTE 386 Station
Production Well Station MCE 2231
Production Well Station MCE 4468

February 6 and 7, 2013

Erie Service Center Complex
Regulating Station #572
City Mission Meter Set
Erie Regulating Station #14D
Erie Measuring Station #4463X
Pittsburgh Gate Station
IMR Meter Set #15151
IMR Meter Set #15154
MCE Regulating Station #2009

January 21 and 22, 2008

Erie Service Center Complex
5th and Wayne Street Regulating Station
3rd and French Avenue Regulating Station #1009
West County Service Center
Warren Service Center
Dalrymple Street Regulating Station
Davey Hill Regulating Station
Oil City-Franklin Service Center

Regulating Station T-2486
Merasol Industrial Meter Set
Rouseville #5 Regulating Station

October 8, 2002

Pittsburgh Avenue Gate Station
Oil Creek Station
Ridge Avenue Station
Oregon Street Regulating Station
Main Street (Seneca) Station
Webco Meter Set
Channelock Industrial Metering Station
Sunburst Electronics Metering Station
Oil City Service Center
Meadville Service Center
Erie Service Center Complex

May 26, 1998

Sharon-Greenville Service Center
West County Service Center
Erie Service Center Complex
Erie General Office - 800 State Street
Bradford Service Center
Bradford Regulator Station #T2388
East Avenue Regulator Station #2
Greenville High School Regulator Station #43
Fairview City Gate Station
8th & Delaware District Station
8th & Greengarden District Station

May 27, 1998

Oil City - Franklin Service Center
Warren Service Center
Marion Street Regulator Station
Conowango Avenue Regulator Station
Main Street Regulator Station #158

January 22, 1992

Elk Service Center
Warren Service Center
Warren Regulating Stations RS-22D and RS-17D
Corry Service Center
Corry Regulating Station RS-13D
Erie Service Center Complex

January 23, 1992

Erie General Office
Greenville Service Center
Sharon Commercial Office
Sharon Service Center
Chicora Service Center
DuBois Service Center

June 9, 1987

Corry Service Center
Columbus Regulator Station
Warren Service Center
West County Service Center
Fairview City Gate Station
Erie Service Center Complex
Erie General Office
Erie Commercial Office - Leased

June 10, 1987

Meadville Service Center
Meadville Commercial Office
Oil City Industrial Regulating Stations
Reno City Gate Station
Oil City - Franklin Service Center
Measuring and Regulating Stations T-508 and 154
Oil City Consumer Assistance Center
Clarion Service Center
DuBois Measuring and Regulation Station
DuBois Consumer Assistance Center
DuBois Service Center

August 18, 1982

Elk Service Center
DuBois Service Center
Clarion Service Center
Oil City Service Center
Franklin Service Center
Sharon Commercial Office
Sharon Service Center
Greenville Service Center
Meadville Service Center
Meadville Commercial Office
West County Service Center

August 19, 1982
Erie Commercial Office - Leased
Erie General Office
Erie Service Center Complex

Judgment

The survivor curve estimates were based on judgment which considered a number of factors. The primary factors were the statistical analyses of data; current Company policies and outlook as determined during the field trips and other discussions with management; current developments in the gas industry; and the survivor curve estimates from previous studies for the National Fuel Gas Distribution Corporation, its predecessor companies, and other gas companies.

For many plant accounts and subaccounts for which survivor curves were estimated, the statistical analyses resulted in good to excellent indications of the survivor patterns experienced. Generally, the statistical analyses were the primary bases for the estimates for the following accounts, although information external to the statistics contributed to the specific interpretations of those statistics in several cases.

328	Measuring and Regulating Station Structures
332	Field Lines
334	Measuring and Regulating Station Equipment
366.2	Measuring and Regulating Station Structures
366.3	Other Structures
367.1	Mains - Excl. Cathodic Protection
367.2/376.2	Mains - Cathodic Protection
369	Measuring and Regulating Station Equipment
	1980 and Prior
	1981 and Subsequent
375/390	Structures and Improvements - Service Centers
375/390	Structures and Improvements - Offices
375/390	Structures and Improvements - Small
376.1	Mains - Excl. Cathodic Protection
378	Measuring and Regulating Station Equipment
380	Services
381	Meters
382	Meter Installations
384	House Regulator Installations
385	Industrial Measuring and Regulating Station Equipment

Account 376.1, Mains - Excluding Cathodic Protection, is used to illustrate the manner in which the study was conducted for the groups in the preceding list. This account represents 44 percent of the total depreciable plant. Aged plant accounting data have been compiled for the years 1960 through 2022. These data have been coded according to account or property group, type of transaction, year in which the transaction took place, and year in which the gas plant was placed in service. The retirements, and other plant transactions, and plant additions were analyzed by the retirement rate method.

The 1960-2022 and 1993-2022 experience bands are most indicative of future expectations. Discussions with operating and managing personnel, as well as field observations related to reasons for retirement and the changing average service life, indicated that public authority requirements, leak detection programs and the use of plastic mains have become more significant in recent years. These factors are expected to continue into the future. The Iowa 70-L1.5 survivor curve is estimated to represent the future, inasmuch as it is a reasonable interpretation of the significant portion of the 1960-2022 and 1993-2022 experience, through age 107, and reflects the expectations of management.

For Account 375.3, a life span was estimated for each major structure. Each life span was estimated on the basis of type of construction, use, age, condition, and management's plans within the foreseeable future. Interim survivor curves were estimated for the major structures based primarily upon statistical analyses of the interim retirements that have been experienced by the Company's service centers and offices.

The historical analyses for Accounts 380, 382 and 384 were combined due to present Company policy to retire all three assets when replacing one of the property units. The estimate for cathodic protection equipment, anodes and rectifiers, is the 27-

S2.5 and is based on historical indications, discussions with management and estimates for such equipment in other gas companies. The survivor curve estimate for Account 325.4 was based on judgment incorporating the nature of the plant and estimates for the same account in other gas companies.

The estimate for the rights-of-way included in Accounts 365.2 and 374.2 were based on a review of the age and magnitude of experienced retirements and a consideration of the survivor curves estimated for Accounts 367.1, Mains - Excluding Cathodic Protection and Account 376.1, Mains - Excluding Cathodic Protection, with which the rights are associated. The rates of retirement have been small during the early portion of the life cycle and are of use only in defining the foreportion of the estimated survivor curve. The 80-R4 survivor curve is consistent between the estimated curve for the rights of way accounts.

PART IV. CALCULATION OF ANNUAL AND ACCRUED DEPRECIATION

PART IV. CALCULATION OF ANNUAL AND ACCRUED DEPRECIATION

Group Depreciation Procedures

A group procedure for depreciation is appropriate when considering more than a single item of property. Normally, the items within a group do not have identical service lives, but have lives that are dispersed over a range of time. There are two primary group procedures, namely, average service life and equal life group.

In the average service life procedure, the rate of annual depreciation is based on the average life or average remaining life of the group, and this rate is applied to the surviving balances of the group's cost. A characteristic of this procedure is that the cost of plant retired prior to average life is not fully recouped at the time of retirement, whereas the cost of plant retired subsequent to average life is more than fully recouped. Over the entire life cycle, the portion of cost not recouped prior to average life is balanced by the cost recouped subsequent to average life.

In the equal life group procedure, the property group is subdivided according to service life. That is, each equal life group includes that portion of the property which experiences the life of that specific group. The relative size of each equal life group is determined from the property's life dispersion curve. This procedure eliminates the need to base depreciation on average lives, inasmuch as each group is equivalent to a unit having a single life. The full costs of short-lived units are accrued during their lives, leaving no deferral of accruals required to be added to the annual costs associated with long-lived units. The calculated depreciation for the property group is the summation of the calculated depreciation based on the service life of each equal life group.

Remaining Life Annual Accruals

For the purpose of calculating remaining life accrual rates as of September 30, 2026, the estimated book depreciation reserve for each plant account is allocated among

vintages in proportion to the calculated accrued depreciation for the account. Explanations of remaining life accruals and calculated accrued depreciation for the vintages calculated by the average service life procedure and for the vintages calculated by the equal life group procedure follow. The detailed calculations are set forth in the Results of Study section of the report.

Average Service Life Procedure

In the average service life procedure, the remaining life annual accrual for each vintage is determined by dividing future book accruals (original cost less book reserve) by the average remaining life of the vintage. The average remaining life is a directly weighted average derived from the estimated future survivor curve in accordance with the average service life procedure.

The calculated accrued depreciation for each depreciable property group represents that portion of the depreciable cost of the group which would not be allocated to expense through future whole life depreciation accruals if current forecasts of life characteristics are used as the basis for such accruals. The accrued depreciation calculation consists of applying an appropriate ratio to the surviving original cost of each vintage of each account, based upon the attained age and service life. The straight line accrued depreciation ratios are calculated as follows for the average service life procedure:

$$Ratio = 1 - \frac{Average\ Remaining\ Life\ Expectancy}{Average\ Service\ Life}.$$

Equal Life Group Procedure

In the equal life group procedure, the remaining life annual accrual for each vintage is determined by dividing future book accruals (original cost less book reserve) by the composite remaining life for the surviving original cost of that vintage. The

composite remaining life is derived by compositing the individual equal life group remaining lives in accordance with the following equation:

$$Composite\ Remaining\ Life\ -\ \frac{(\frac{Book\ Cost}{Life}\ x\ Remaining\ Life)}{\frac{Book\ Cost}{Life}}$$

The book costs and lives of the several equal life groups which are summed in the foregoing equation are defined by the estimated future survivor curve.

Inasmuch as book cost divided by life equals the whole life annual accrual, the foregoing equation reduces to the following form:

$$Composite\ Remaining\ LIfe\ =\ \frac{\sum Whole\ Life\ Future\ Accruals}{\sum Whole\ Life\ Annual\ Accruals}$$

or

$$Composite\ Remaining\ Life\ =\ \frac{\sum Book\ Cost\ -\ Calc.\ Reserve}{\sum Whole\ Life\ Annual\ Accrual}.$$

The annual accrual rate for each account is equal to the sum of the remaining life annual accruals for all vintages divided by the account's total original cost. The account's "composite remaining life" is calculated by dividing the sum of the future book accruals for all vintages by the sum of the remaining life annual accruals for all vintages.

The calculated accrued depreciation in the equal life group procedure also represents that portion of depreciable cost which will not be allocated to expense through future accruals. However, the calculation is based at the equal life group level rather than the vintage group level, and does not require the use of averages. The equal life group accrued depreciation ratio is calculated as follows:

$$Ratio = \frac{Remaining\ Life}{Average\ Service\ Life}.$$

Inasmuch as service life minus remaining life equals age, when averages are not employed, the foregoing equation reduces to:

$$Ratio = \frac{Age}{Service\ Life}.$$

The table on the following page illustrates the procedure for calculating straight line equal life group accrued depreciation, using an Iowa 27-S2.5 survivor curve and a September 30, 2025 calculation date.

In the table, each equal life group is defined by the age interval shown in columns 1 and 2, which identify the ages at which the first and last retirement of each group occur. The group's designated life, shown in column 3, is the midpoint of the interval. In the calculation, the equal life groups of each vintage are arranged such that the midpoint of each one-year age interval coincides with the calculation date, e.g., September 30 in this case. This enables the calculation of annual accruals which are centered on, or as of, the same date as the calculation of accrued depreciation.

The retirement during each age interval, shown in column 4, is the size of each equal life group. It is derived from the Iowa 27-S2.5 survivor curve, and is the difference between the percents surviving (not shown) at the beginning and end of the age interval.

Each equal life group's whole life annual accrual, shown in column 5, equals the group's size (column 4) divided by its life (column 3), except that for the first age interval the annual accrual is set equal to the group's size.

Columns 6 through 10 show the derivation of the whole life annual factor and accrued factor for each vintage, based on the data developed in the first five columns. The year installed is shown in column 6. For all vintages other than 2025, the summation of annual accruals for each year installed, shown in column 7, is calculated by adding one-half of the group annual accrual (column 5) for that vintage's current age interval plus the group annual accruals for all succeeding age intervals. For example, the figure

4.41622974711 for 2024 equals one-half of 0.00027000000 plus all of the succeeding figures in column 5.

DETAILED COMPUTATION OF ANNUAL AND ACCRUED FACTORS USING THE EQUAL LIFE GROUP PROCEDURE

INPUT PARAMETERS:
CALCULATION DATE.. 9-30-2026
SURVIVOR CURVE.... 27-S2.5

AGE INTERVAL BEG (1)	END (2)	LIFE (3)	RETIREMENTS DURING INTERVAL (4)	GROUP ANNUAL ACCRUAL (5)=(4)/(3)	YEAR INST (6)	SUMMATION OF ANNUAL ACCRUALS (7)	AVERAGE PERCENT SURVIVING (8)	ANNUAL FACTOR (9)	ACCRUED FACTOR (10)
0.000	0.750	0.375	0.00000	0.00000000000	2026	3.57804245275	87.499999	0.0409	0.0153
0.750	1.750	1.250	0.00040	0.00032000000	2025	4.08903137457	99.999798	0.0409	0.0511
1.750	2.750	2.250	0.00270	0.00120000000	2024	4.08827137457	99.998246	0.0409	0.0920
2.750	3.750	3.250	0.00945	0.00290769231	2023	4.08621752841	99.992173	0.0409	0.1329
3.750	4.750	4.250	0.02380	0.00560000000	2022	4.08196368226	99.975547	0.0408	0.1734
4.750	5.750	5.250	0.04865	0.00926666667	2021	4.07453034892	99.939321	0.0408	0.2142
5.750	6.750	6.250	0.08740	0.01398400000	2020	4.06290501559	99.871298	0.0407	0.2544
6.750	7.750	7.250	0.14598	0.02013517241	2019	4.04584542938	99.754609	0.0406	0.2944
7.750	8.750	8.250	0.22525	0.02730303030	2018	4.02212632803	99.568992	0.0404	0.3333
8.750	9.750	9.250	0.33074	0.03575567568	2017	3.99059697504	99.290999	0.0402	0.3719
9.750	10.750	10.250	0.46833	0.04569073171	2016	3.94987377134	98.891465	0.0399	0.4090
10.750	11.750	11.250	0.63971	0.05686311111	2015	3.89859684993	98.337443	0.0396	0.4455
11.750	12.750	12.250	0.84578	0.06904326531	2014	3.83564366172	97.594698	0.0393	0.4814
12.750	13.750	13.250	1.09117	0.08235245283	2013	3.75994580265	96.626224	0.0389	0.5154
13.750	14.750	14.250	1.37754	0.09666947368	2012	3.67043483940	95.391869	0.0385	0.5486
14.750	15.750	15.250	1.69413	0.11109049180	2011	3.56655485666	93.856033	0.0380	0.5795
15.750	16.750	16.250	2.04191	0.12565600000	2010	3.44818161076	91.988017	0.0375	0.6094
16.750	17.750	17.250	2.42052	0.14032000000	2009	3.31519361076	89.756803	0.0369	0.6365
17.750	18.750	18.250	2.80765	0.15384383562	2008	3.16811169295	87.142715	0.0364	0.6643
18.750	19.750	19.250	3.19982	0.16622441558	2007	3.00807756735	84.138979	0.0358	0.6892
19.750	20.750	20.250	3.58830	0.17720000000	2006	2.83636535956	80.744919	0.0351	0.7108
20.750	21.750	21.250	3.95646	0.18618635294	2005	2.65467218309	76.972539	0.0345	0.7331
21.750	22.750	22.250	4.28679	0.19266471910	2004	2.46524664707	72.850917	0.0338	0.7521
22.750	23.750	23.250	4.57587	0.19681161290	2003	2.27050848107	68.419588	0.0332	0.7719
23.750	24.750	24.250	4.81107	0.19839463918	2002	2.07290535503	63.726114	0.0325	0.7881
24.750	25.750	25.250	4.97517	0.19703643564	2001	1.87518981762	58.832995	0.0319	0.8055
25.750	26.750	26.250	5.07139	0.19319580952	2000	1.68007369504	53.809717	0.0312	0.8190
26.750	27.750	27.250	5.09101	0.18682605505	1999	1.49006276275	48.728517	0.0306	0.8339
27.750	28.750	28.250	5.03171	0.17811362832	1998	1.30759292107	43.667158	0.0299	0.8447
28.750	29.750	29.250	4.90228	0.16759931624	1997	1.13473644879	38.700160	0.0293	0.8570
29.750	30.750	30.250	4.70164	0.15542611570	1996	0.97322373282	33.898201	0.0287	0.8682
30.750	31.750	31.250	4.43779	0.14200928000	1995	0.82450603497	29.328485	0.0281	0.8781
31.750	32.750	32.250	4.12588	0.12793426357	1994	0.68953426318	25.046652	0.0275	0.8869
32.750	33.750	33.250	3.77776	0.11361684211	1993	0.56875871034	21.094833	0.0270	0.8978
33.750	34.750	34.250	3.39371	0.09908642336	1992	0.46240707761	17.509097	0.0264	0.9042
34.750	35.750	35.250	3.00345	0.08520425532	1991	0.37026173827	14.310517	0.0259	0.9130
35.750	36.750	36.250	2.61377	0.07210400000	1990	0.29160761061	11.501908	0.0254	0.9208
36.750	37.750	37.250	2.22812	0.05981530201	1989	0.22564795960	9.080960	0.0248	0.9238
37.750	38.750	38.250	1.86478	0.04875241830	1988	0.17136409945	7.034509	0.0244	0.9333
38.750	39.750	39.250	1.53153	0.03901987261	1987	0.12747795399	5.336357	0.0239	0.9381
39.750	40.750	40.250	1.23038	0.03056844720	1986	0.09268379409	3.955402	0.0234	0.9419

Only one-half of the annual accrual for the vintage's current age interval group is included in the summation because the equal life group for that interval has reached the year during which it is expected to be retired.

For vintage 2025, the summation of annual accruals (column 7) includes the entire group annual accrual (column 5) for that vintage's current age interval, in order to fully recoup the retirements which occur during that first age interval, 0 to 1. Thus, the first figure in column 7, for vintage 2025, equals the entire group annual accrual for the first equal group plus the accruals for all of the subsequent equal life groups.

The average percent surviving, derived from the Iowa 27-S2.5 survivor curve, is shown in column 8 for each age interval. The annual factor, shown in column 9, is the result of dividing the summation of annual accruals (column 7) by the average percent surviving (column 8).

The accrued depreciation factor, shown in column 10, equals the annual factor multiplied by the age of the group at September 30, 2025.

CALCULATION OF ANNUAL AND ACCRUED AMORTIZATION

Amortization, as defined in the Uniform System of Accounts, is the gradual extinguishment of an amount in an account by distributing such amount over a fixed period, over the life of the asset or liability to which it applies, or over the period during which it is anticipated the benefit will be realized. Normally, the distribution of the amount is in equal amounts to each year of the amortization period.

The calculation of annual and accrued amortization requires the selection of an amortization period. The amortization periods used in this report were based on judgment which incorporated a consideration of the period during which the assets will render most of their service, the amortization periods and service lives used by other

utilities, and the service life estimates previously used for the asset under depreciation accounting.

Amortization accounting is appropriate for certain General Plant accounts that represent numerous units of property, but a very small portion of depreciable gas plant in service. The accounts and their amortization periods are as follows:

	Account	Amortization Period, Years
391	Office Furniture and Equipment	
	Furniture	25
	Equipment	15
	Computers	5
394	Tools, Shop and Garage Equipment	25
397	Communication Equipment	10

For the purpose of calculating annual amortization amounts as of September 30, 2026, the book depreciation reserve for each plant account or subaccount is assigned or allocated to vintages. The book reserve assigned to vintages with an age greater than the amortization period is equal to the vintage's original cost. The remaining book reserve is allocated among vintages with an age less than the amortization period in proportion to the calculated accrued amortization. The calculated accrued amortization is equal to the original cost multiplied by the ratio of the vintage's age to its amortization period. The annual amortization amount is determined by dividing the future amortizations (original cost less allocated book reserve) by the remaining period of amortization for the vintage.

AMORTIZATION OF NET SALVAGE

Experienced net salvage is incorporated in the results of the study, as was reported on the Company's books and records for the fiscal year 2022 through September 30, 2026. The data for the twelve months ending September 30, 2026 is based on estimated experience. Results of the calculations are shown in Table 4.

Net salvage experienced during the five-year period is presented in this manner to determine the amount of negative net salvage to be amortized for book purposes. In developing the amount to be amortized, the data for the accounts which experienced positive net salvage have been netted with those for accounts which experienced negative net salvage.

In order to be consistent with this manner of recognizing net salvage, no adjustments for salvage were made to the annual accruals and accrued depreciation calculated for each individual account. There were no exclusions from the 2022 through 2026 net salvage accrual.

PART V. RESULTS OF STUDY

PART V. RESULTS OF STUDY

DESCRIPTION OF SUMMARY TABULATIONS

Tables 1 through 4 presented on pages V-4 through V-9 summarize the results of the depreciation study as of September 30, 2026. Table 1 sets forth, by depreciable group, the estimated survivor curve, original cost, book depreciation reserve as of September 30, 2026, future book accruals, calculated annual accrual amount and rate, and composite remaining life for plant in service. Table 2 presents the bringforward of the book reserve to September 30, 2026. Table 3 sets forth the calculation of the depreciation accruals for the twelve months ended September 30, 2026. Table 4 presents the annual amortization of experienced and estimated net salvage based on the period 2022 through 2026.

DESCRIPTION OF DETAILED TABULATIONS

Supporting statistical data for the estimates of average service lives and survivor curves, the annual depreciation calculations, and gross salvage and cost of removal for the years 2022-2026 are presented in three sections.

The section beginning on page VI-2 sets forth, for each depreciable group analyzed by the retirement rate method, a chart depicting the original and estimated survivor curves followed by a tabular presentation of the original life table(s) plotted on the chart. A cumulative summary, by year installed, for gas plant and the supporting data for the original cost depreciation calculations are presented in the section beginning on page VII-2. The tabulations of experienced and estimated net salvage by year by account for the five-year period, 2022-2026, are presented in the section beginning on page VIII-2.

In the first section, the survivor curves estimated for the depreciable groups are shown as dark smooth curves on the charts. Each smooth survivor curve is denoted by a

numeral followed by the type curve designation. The numeral used is the average life derived from the entire curve from 100 percent to zero percent surviving. In cases where only a segment of the estimated curve is used in the depreciation calculation, the numeral used for identification purposes is not a designation of the average life of the group. The titles of the charts indicate the group, the symbol used to plot the points of the original life table, and the experience and placement bands of the life tables which were plotted. The experience band indicates the range of years for which the retirements were used to develop the stub survivor curve. The placements indicate, for the related experience band, the range of years of installations which appear in the experience.

The tables of the calculated annual depreciation related to original cost are presented in the second section and indicate the estimated average survivor curves used in the calculations. The tables set forth, for each installation year, the original cost, calculated accrued depreciation, allocated book reserve, future book accruals, remaining life expectancy and the calculated annual accrual.

Detailed tabulations setting forth the cost of removal and gross salvage amounts, by plant account for each year, are presented beginning on page VIII-2. The total gross salvage and removal costs, by year, were used to calculate the five-year net salvage amortization presented in Table 4 on page V-9.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF SEPTEMBER 30, 2026

	DEPRECIABLE GROUP	SURVIVOR CURVE	ORIGINAL COST AS OF SEPTEMBER 30, 2026	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	COMPOSITE REMAINING LIFE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)=(6)/(3)	(8)=(5)/(6)
DEPRECIABLE PLANT								
303	MISCELLANEOUS INTANGIBLE PLANT	10-SQ	24,487,946.38	22,593,631	1,894,315	386,140	1.58	4.9
PRODUCTION PLANT								
325.4	RIGHTS OF WAY	70-R4	55,006.53	35,810	19,197	515	0.94	37.3
328	MEASURING AND REGULATING STATION STRUCTURES	30-L2.5	11,077.40	9,773	1,304	66	0.60	19.8
329	OTHER STRUCTURES	40-SQ	2,904.48	1,403	1,501	76	2.62	19.8
332	FIELD LINES	50-R1.5	487,774.55	171,978	315,797	12,218	2.50	25.8
334	MEASURING AND REGULATING STATION EQUIPMENT	32-O1	3,588,782.71	1,733,727	1,855,056	114,038	3.18	16.3
TOTAL PRODUCTION PLANT			**4,145,545.67**	**1,952,691**	**2,192,855**	**126,913**	**3.06**	
TRANSMISSION PLANT								
365.2	RIGHTS OF WAY	80-R4	2,842,251.07	682,851	2,159,400	36,163	1.27	59.7
366.2	MEASURING AND REGULATING STATION STRUCTURES	60-R2	251,285.57	118,684	132,602	4,628	1.84	28.7
366.3	OTHER STRUCTURES	60-R2	5,081.76	3,593	1,489	41	0.81	36.3
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	70-R2	72,491,899.16	20,383,572	52,108,327	1,176,640	1.62	44.3
367.2	MAINS - CATHODIC PROTECTION	27-S2.5	4,889,292.14	2,294,098	2,595,194	158,872	3.25	16.3
369	MEASURING AND REGULATING STATION EQUIPMENT							
	1980 AND PRIOR	30-R0.5	259,368.57	259,369	0	0	-	-
	1981 AND SUBSEQUENT	40-R1.5	8,503,779.29	4,153,033	4,350,746	136,318	1.60	31.9
	TOTAL ACCOUNT 369		8,763,147.86	4,412,402	4,350,746	136,318	1.56	31.9
TOTAL TRANSMISSION PLANT			**89,242,957.56**	**27,895,200**	**61,347,758**	**1,512,662**	**1.69**	
DISTRIBUTION PLANT								
374.2	RIGHTS OF WAY	80-R4	16,023,145.64	3,338,953	12,684,193	208,068	1.30	61.0
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	VARIOUS *	11,651,525.05	6,224,278	5,427,248	382,328	3.28	14.2
375.4	STRUCTURES AND IMPROVEMENTS - SMALL	40-R0.5	1,383,573.65	326,910	1,056,664	30,249	2.19	34.9
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	70-L1.5	400,109,007.61	114,664,307	285,444,701	7,053,848	1.76	40.5
376.2	MAINS - CATHODIC PROTECTION	27-S2.5	2,741,104.22	1,732,866	1,008,238	72,188	2.63	14.0
378	MEASURING AND REGULATING STATION EQUIPMENT	40-R0.5	11,068,313.02	4,293,395	6,774,918	325,075	2.94	20.8
380	SERVICES	55-R0.5	230,084,470.78	87,631,319	142,453,152	4,815,170	2.09	29.6
381	METERS	37-R1.5	17,736,870.40	6,622,195	11,114,675	524,335	2.96	21.2
382	METER INSTALLATIONS	55-R0.5	3,530,905.96	1,924,742	1,606,164	57,331	1.62	28.0
384	HOUSE REGULATOR INSTALLATIONS	55-R0.5	1,229,482.65	604,497	624,986	21,247	1.73	29.4
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	55-R2	18,802,489.79	7,424,326	11,378,164	343,117	1.82	33.2
TOTAL DISTRIBUTION PLANT			**714,360,888.77**	**234,787,788**	**479,573,103**	**13,832,956**	**1.94**	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF SEPTEMBER 30, 2026

	DEPRECIABLE GROUP	SURVIVOR CURVE	ORIGINAL COST AS OF SEPTEMBER 30, 2026	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	COMPOSITE REMAINING LIFE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)=(6)/(3)	(8)=(5)/(6)
GENERAL PLANT								
390.11	OTHER SMALL STRUCTURES	40-R0.5	1,428,040.58	98,290	1,329,751	67,433	4.72	19.7
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	25-SQ	328,739.97	138,489	190,251	11,188	3.40	17.0
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	15-SQ	244,973.84	210,181	34,793	2,442	1.00	14.2
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	5-SQ	7,740,747.62	3,553,490	4,187,258	1,394,350	18.01	3.0
392	TRANSPORTATION EQUIPMENT		15,360,082.17	7,508,111	7,851,971	1,732,782	**	
394	TOOLS, SHOP AND GARAGE EQUIPMENT	25-SQ	10,297,183.94	2,350,040	7,947,144	409,212	3.97	19.4
396	POWER OPERATED EQUIPMENT AND TOOLS		11,426,348.22	2,967,643	8,458,705	991,863	**	
397	COMMUNICATION EQUIPMENT	10-SQ	4,335,043.11	1,603,148	2,731,895	422,713	9.75	6.5
TOTAL GENERAL PLANT			**51,161,159.45**	**18,429,392**	**32,731,768**	**5,031,983**	**9.84**	
TOTAL DEPRECIABLE GAS PLANT			**883,398,497.83**	**305,658,702**	**577,739,799**	**20,890,654**	**2.36**	
NONDEPRECIABLE PLANT								
	INTANGIBLE PLANT		123,845.54					
	PRODUCTION PLANT		2,840.80					
	TRANSMISSION PLANT		20,192.52	(106)				
	DISTRIBUTION PLANT		1,016,687.37	12,895				
	GENERAL PLANT		59,856.94	(20,689)				
TOTAL NONDEPRECIABLE PLANT			**1,223,423.18**	**(7,900)**				
TOTAL GAS PLANT			**884,621,921.01**	**305,650,802**	**577,739,799**	**20,890,654**		

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* LIFE SPAN PROCEDURE WAS USED. INTERIM SURVIVOR CURVES ARE 60-S0 AND 40-R0.5.
** ASSETS ARE INDIVIDUALLY DEPRECIATED.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 2. BRINGFORWARD TO SEPTEMBER 30, 2026 OF THE BOOK RESERVE AS OF SEPTEMBER 30, 2025

	ACCOUNT	BOOK RESERVE AS OF SEPTEMBER 30, 2025	+	ANNUAL ACCRUALS	-	RETIREMENTS	+	AMORTIZATION OF NET SALVAGE	+	GROSS SALVAGE	-	COST OF REMOVAL	+	MISCELLANEOUS DEBITS AND CREDITS	=	BOOK RESERVE AS OF SEPTEMBER 30, 2026	BOOK RESERVE AS A PERCENT OF ORIGINAL COST
	(1)	(2)		(3)		(4)		(5)		(6)		(7)		(8)		(9)	(10)
303	MISCELLANEOUS INTANGIBLE PLANT	20,948,041		1,645,590												22,593,631	92.26
325.4	RIGHTS OF WAY	36,419		441		1,050										35,810	65.10
328	MEASURING AND REGULATING STATION STRUCTURES	9,957		17		201										9,773	88.22
329	OTHER STRUCTURES	1,384		71		52										1,403	48.30
332	FIELD LINES	169,496		11,328		8,846										171,978	35.26
334	MEASURING AND REGULATING STATION EQUIPMENT	1,706,176		97,463		64,311		4,976				10,576				1,733,727	48.31
365.1	LAND	0				106										(106)	(0.52)
365.2	RIGHTS OF WAY	665,680		33,364		16,194										682,851	24.03
366.2	MEASURING AND REGULATING STATION STRUCTURES	116,213		4,156		1,482		241				445				118,684	47.23
366.3	OTHER STRUCTURES	3,637		9		53										3,593	70.70
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	19,860,314		1,046,624		413,983		66,229				175,612				20,383,572	28.12
367.2	MAINS - CATHODIC PROTECTION	2,211,073		130,119		45,998		414				1,510				2,294,098	46.92
369	MEASURING AND REGULATING STATION EQUIPMENT	4,384,695		110,793		51,385		9,262				40,962				4,412,402	50.35
374.1	LAND	20,997				4,300		4,253		546		8,601				12,895	1.27
374.2	RIGHTS OF WAY	3,275,141		199,155		68,805		411				66,948				3,338,953	20.84
375	STRUCTURES AND IMPROVEMENTS	6,184,403		389,689		56,519		74,649		5		41,040				6,551,188	50.26
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	109,664,023		6,838,780		1,710,842		1,020,165		10,256		1,158,076				114,664,307	28.66
376.2	MAINS - CATHODIC PROTECTION	1,684,792		66,138		17,281		574				1,356				1,732,866	63.22
378	MEASURING AND REGULATING STATION EQUIPMENT	3,971,454		320,202		47,918		62,790				13,133				4,293,395	38.79
380	SERVICES	83,883,689		4,555,951		1,001,058		381,783				189,046				87,631,319	38.09
381	METERS	6,166,777		522,073		66,655										6,622,195	37.34
382	METER INSTALLATIONS	1,888,692		51,409		15,358										1,924,742	54.51
384	HOUSE REGULATOR INSTALLATIONS	590,253		19,466		5,222										604,497	49.17
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	7,198,874		329,008		77,713		22,650		1		48,494				7,424,326	39.49
389.1	LAND	(16,289)				4,401										(20,689)	(34.56)
390.11	OTHER SMALL STRUCTURES	30,192		77,110		9,182		170								98,290	6.88
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	128,890		9,599												138,489	42.13
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	218,003		15,440		23,262										210,181	85.80
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	3,372,033		1,484,848		1,303,391										3,553,490	45.91
392	TRANSPORTATION EQUIPMENT	6,913,935		1,732,782		1,138,606										7,508,111	48.88
394	TOOLS, SHOP AND GARAGE EQUIPMENT	2,052,863		372,603		75,426										2,350,040	22.82
396	POWER OPERATED EQUIPMENT AND TOOLS	2,822,852		991,863		847,073										2,967,643	25.97
397	COMMUNICATION EQUIPMENT	2,222,231		424,375		1,043,458										1,603,148	36.98
TOTAL		**292,386,888**		**21,480,466**		**8,120,131**		**1,648,567**		**10,809**		**1,755,799**		**0**		**305,650,802**	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 3. CALCULATION OF DEPRECIATION ACCRUALS FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2026

	DEPRECIABLE GROUP	ORIGINAL COST AS OF SEPTEMBER 30, 2025	ORIGINAL COST AS OF SEPTEMBER 30, 2026	COMPOSITE ACCRUAL RATE	ANNUAL ACCRUAL AMOUNT
	(1)	(3)	(3)	(4)	(5)
DEPRECIABLE PLANT					
303	MISCELLANEOUS INTANGIBLE PLANT	24,487,946.38	24,487,946.38	6.72	1,645,590
PRODUCTION PLANT					
325.4	RIGHTS OF WAY	49,880.62	55,006.53	0.84	441
328	MEASURING AND REGULATING STATION STRUCTURES	10,095.84	11,077.40	0.16	17
329	OTHER STRUCTURES	2,650.00	2,904.48	2.57	71
332	FIELD LINES	444,586.00	487,774.55	2.43	11,328
334	MEASURING AND REGULATING STATION EQUIPMENT	3,274,793.21	3,588,782.71	2.84	97,463
TOTAL PRODUCTION PLANT		**3,782,005.67**	**4,145,545.67**		**109,320**
TRANSMISSION PLANT					
365.2	RIGHTS OF WAY	2,453,606.71	2,842,251.07	1.26	33,364
366.2	MEASURING AND REGULATING STATION STRUCTURES	215,723.34	251,285.57	1.78	4,156
366.3	OTHER STRUCTURES	3,811.68	5,081.76	0.21	9
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	62,556,320.47	72,491,899.16	1.55	1,046,624
367.2	MAINS - CATHODIC PROTECTION	3,785,338.94	4,889,292.14	3.00	130,119
369	MEASURING AND REGULATING STATION EQUIPMENT	7,529,900.57	8,763,147.86	1.36	110,793
TOTAL TRANSMISSION PLANT		**76,544,701.71**	**89,242,957.56**		**1,325,065**
DISTRIBUTION PLANT					
374.2	RIGHTS OF WAY	15,094,770.41	16,023,145.64	1.28	199,155
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	11,456,732.03	11,651,525.05	3.17	366,266
375.4	STRUCTURES AND IMPROVEMENTS - SMALL	815,772.72	1,383,573.65	2.13	23,423
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	377,025,040.28	400,109,007.61	1.76	6,838,780
376.2	MAINS - CATHODIC PROTECTION	2,507,932.83	2,741,104.22	2.52	66,138
378	MEASURING AND REGULATING STATION EQUIPMENT	10,421,765.98	11,068,313.02	2.98	320,202
380	SERVICES	216,577,440.01	230,084,470.78	2.04	4,555,951
381	METERS	16,837,506.89	17,736,870.40	3.02	522,073
382	METER INSTALLATIONS	3,323,679.35	3,530,905.96	1.50	51,409
384	HOUSE REGULATOR INSTALLATIONS	1,159,025.60	1,229,482.65	1.63	19,466
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	17,753,923.12	18,802,489.79	1.80	329,008
TOTAL DISTRIBUTION PLANT		**672,973,589.22**	**714,360,888.77**		**13,291,871**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 3. CALCULATION OF DEPRECIATION ACCRUALS FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2026

	DEPRECIABLE GROUP	ORIGINAL COST AS OF SEPTEMBER 30, 2025	ORIGINAL COST AS OF SEPTEMBER 30, 2026	COMPOSITE ACCRUAL RATE	ANNUAL ACCRUAL AMOUNT
	(1)	(3)	(3)	(4)	(5)
GENERAL PLANT					
390.11	OTHER SMALL STRUCTURES	1,412,106.29	1,428,040.58	5.43	77,110
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	267,456.09	328,739.97	3.22	9,599
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	218,003.15	244,973.84	6.67	15,440
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	7,472,860.23	7,740,747.62	19.52	1,484,848
392	TRANSPORTATION EQUIPMENT	13,402,345.26	15,360,082.17	*	1,732,782
394	TOOLS, SHOP AND GARAGE EQUIPMENT	8,426,595.72	10,297,183.94	3.98	372,603
396	POWER OPERATED EQUIPMENT AND TOOLS	9,970,754.52	11,426,348.22	*	991,863
397	COMMUNICATION EQUIPMENT	4,396,954.45	4,335,043.11	9.72	424,375
TOTAL GENERAL PLANT		**45,567,075.71**	**51,161,159.45**		**5,108,620**
TOTAL DEPRECIABLE GAS PLANT		**823,355,318.69**	**883,398,497.83**		**21,480,466**

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* ASSETS ARE INDIVIDUALLY DEPRECIATED.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

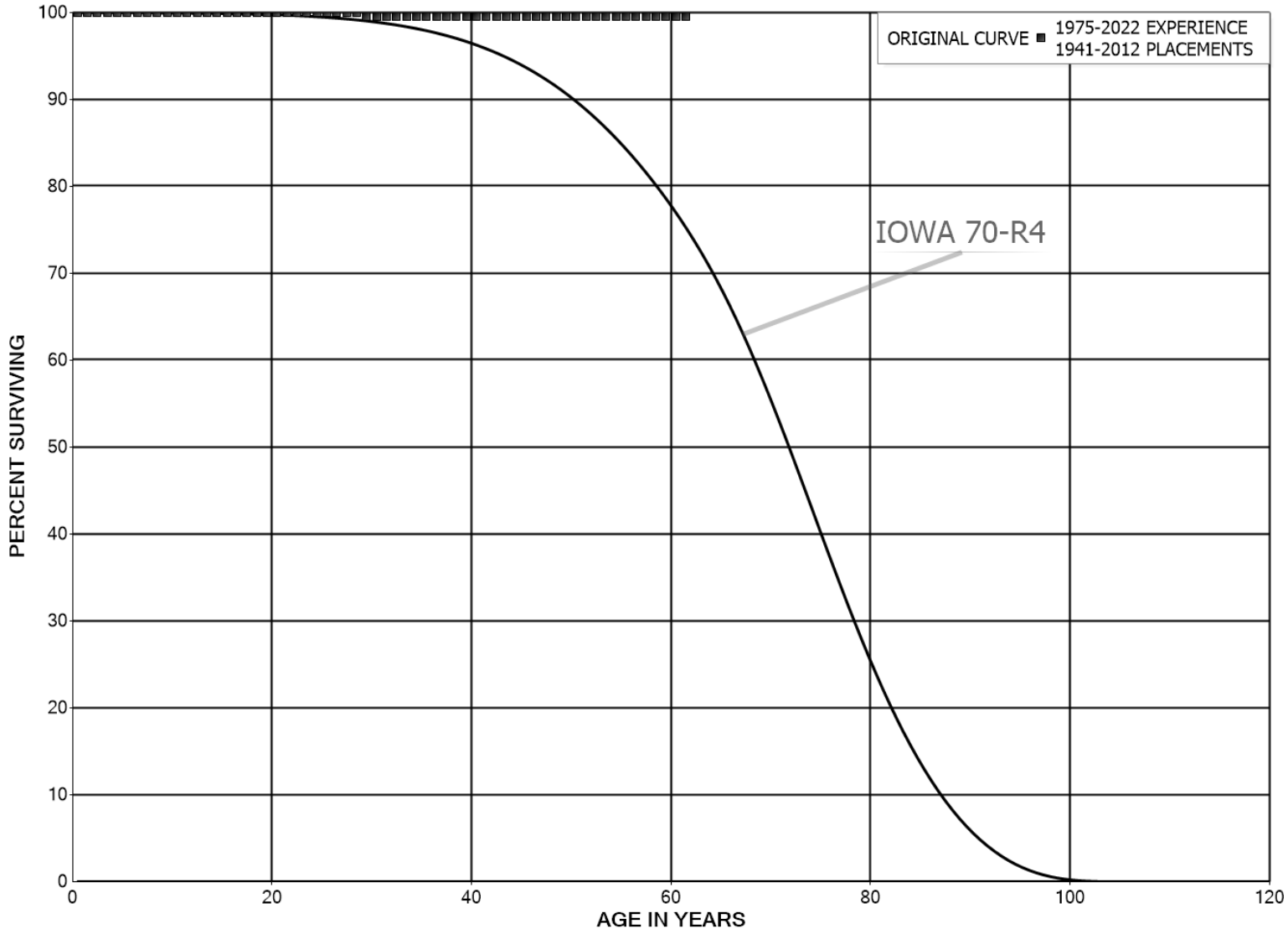
TABLE 4. AMORTIZATION OF EXPERIENCED AND ESTIMATED NET SALVAGE

	2022		2023		2024		2025		2026			
ACCOUNT	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	NET SALVAGE	SALVAGE ACCRUAL
(1)	(2) -	(3) +	(4) -	(5) +	(6) -	(7) +	(8) -	(9) +	(10) -	(11) =	(12)*	(13)=(12)/5
334.00		4,970.85		1,448.50		5,217.60		8,332.68		10,576.24	(30,545.87)	(6,109.00)
366.20						1,202.58				444.53	(1,647.11)	(329)
367.10		28,763.67		5,665.57		57,623.78		121,648.30		175,612.42	(389,313.74)	(77,863)
367.20		198.09		979.24		219.03		454.86		1,509.70	(3,360.92)	(672)
369.00		5,432.55		8,681.35		6,731.04		10,376.84		40,962.40	(72,184.18)	(14,437)
374.10			11,154.00	6,697.10	(10,168.60)	12,578.00		2,973.56	546.08	8,600.68	(29,317.86)	(5,864)
374.20				456.66				1,596.99		66,948.27	(69,001.92)	(13,800)
375.00		66,671.18	50.00	154,258.11		34,621.65		45,560.60	5.50	41,039.56	(342,095.60)	(68,419)
376.10	24,600.36	671,967.90	4,016.83	859,668.17	16,961.74	1,694,252.35		1,165,856.83	10,256.46	1,158,075.86	(5,493,985.72)	(1,098,797)
376.20				2,271.96		45.12				1,356.42	(3,673.50)	(735)
378.00		91,460.00		38,865.63		36,321.76		99,188.50		13,133.20	(278,969.09)	(55,794)
380.00		268,817.58		274,336.97		359,987.72		523,728.59		189,046.12	(1,615,916.98)	(323,183)
385.00	2.19	12,608.15		10,669.49	0.96	49,516.78		26,736.86	1.35	48,493.97	(148,020.75)	(29,604)
390.00				852.37							(852.37)	(170)
TOTAL	**24,602.55**	**1,150,889.97**	**15,220.83**	**1,364,851.12**	**6,794.10**	**2,258,317.41**	**0.00**	**2,006,454.61**	**10,809.38**	**1,755,799.36**	**(8,478,885.61)**	**(1,695,776)**

* COLUMN (12) EQUALS THE SUMMATION OF COLUMNS (2) THROUGH (11).

PART VI. SERVICE LIFE STATISTICS

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 325.4 RIGHTS OF WAY
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 325.4 RIGHTS OF WAY

ORIGINAL LIFE TABLE

PLACEMENT BAND 1941-2012 EXPERIENCE BAND 1975-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	41,503		0.0000	1.0000	100.00
0.5	41,503		0.0000	1.0000	100.00
1.5	41,503		0.0000	1.0000	100.00
2.5	41,503		0.0000	1.0000	100.00
3.5	41,503		0.0000	1.0000	100.00
4.5	40,900	31	0.0008	0.9992	100.00
5.5	40,869		0.0000	1.0000	99.92
6.5	40,869		0.0000	1.0000	99.92
7.5	40,869		0.0000	1.0000	99.92
8.5	40,876		0.0000	1.0000	99.92
9.5	40,876		0.0000	1.0000	99.92
10.5	38,055		0.0000	1.0000	99.92
11.5	41,602		0.0000	1.0000	99.92
12.5	43,445		0.0000	1.0000	99.92
13.5	44,151		0.0000	1.0000	99.92
14.5	44,151		0.0000	1.0000	99.92
15.5	44,545		0.0000	1.0000	99.92
16.5	44,545		0.0000	1.0000	99.92
17.5	45,849		0.0000	1.0000	99.92
18.5	45,839		0.0000	1.0000	99.92
19.5	45,839		0.0000	1.0000	99.92
20.5	45,839		0.0000	1.0000	99.92
21.5	45,839		0.0000	1.0000	99.92
22.5	45,758		0.0000	1.0000	99.92
23.5	45,758		0.0000	1.0000	99.92
24.5	45,758		0.0000	1.0000	99.92
25.5	46,079		0.0000	1.0000	99.92
26.5	46,104		0.0000	1.0000	99.92
27.5	46,164		0.0000	1.0000	99.92
28.5	46,164	174	0.0038	0.9962	99.92
29.5	45,990		0.0000	1.0000	99.55
30.5	45,990		0.0000	1.0000	99.55
31.5	43,882		0.0000	1.0000	99.55
32.5	25,026		0.0000	1.0000	99.55
33.5	23,769		0.0000	1.0000	99.55
34.5	23,742		0.0000	1.0000	99.55
35.5	23,750		0.0000	1.0000	99.55
36.5	23,006		0.0000	1.0000	99.55
37.5	23,986		0.0000	1.0000	99.55
38.5	23,986		0.0000	1.0000	99.55

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 325.4 RIGHTS OF WAY

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1941-2012 EXPERIENCE BAND 1975-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	23,986		0.0000	1.0000	99.55
40.5	23,986		0.0000	1.0000	99.55
41.5	23,986		0.0000	1.0000	99.55
42.5	10,128		0.0000	1.0000	99.55
43.5	10,128		0.0000	1.0000	99.55
44.5	10,128		0.0000	1.0000	99.55
45.5	10,120		0.0000	1.0000	99.55
46.5	10,120		0.0000	1.0000	99.55
47.5	9,012		0.0000	1.0000	99.55
48.5	9,012		0.0000	1.0000	99.55
49.5	9,012		0.0000	1.0000	99.55
50.5	9,012		0.0000	1.0000	99.55
51.5	9,012		0.0000	1.0000	99.55
52.5	9,005		0.0000	1.0000	99.55
53.5	9,005		0.0000	1.0000	99.55
54.5	9,005		0.0000	1.0000	99.55
55.5	5,457		0.0000	1.0000	99.55
56.5	3,625		0.0000	1.0000	99.55
57.5	3,092		0.0000	1.0000	99.55
58.5	3,092		0.0000	1.0000	99.55
59.5	2,699		0.0000	1.0000	99.55
60.5	2,699		0.0000	1.0000	99.55
61.5	1,394		0.0000	1.0000	99.55
62.5	1,394		0.0000	1.0000	99.55
63.5	1,394		0.0000	1.0000	99.55
64.5	1,394		0.0000	1.0000	99.55
65.5	1,394		0.0000	1.0000	99.55
66.5	1,394		0.0000	1.0000	99.55
67.5	1,394		0.0000	1.0000	99.55
68.5	1,394		0.0000	1.0000	99.55
69.5	1,074		0.0000	1.0000	99.55
70.5	1,048		0.0000	1.0000	99.55
71.5	988		0.0000	1.0000	99.55
72.5	988		0.0000	1.0000	99.55
73.5	988		0.0000	1.0000	99.55
74.5	988		0.0000	1.0000	99.55
75.5	988		0.0000	1.0000	99.55
76.5	988		0.0000	1.0000	99.55
77.5	988		0.0000	1.0000	99.55
78.5	988		0.0000	1.0000	99.55

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

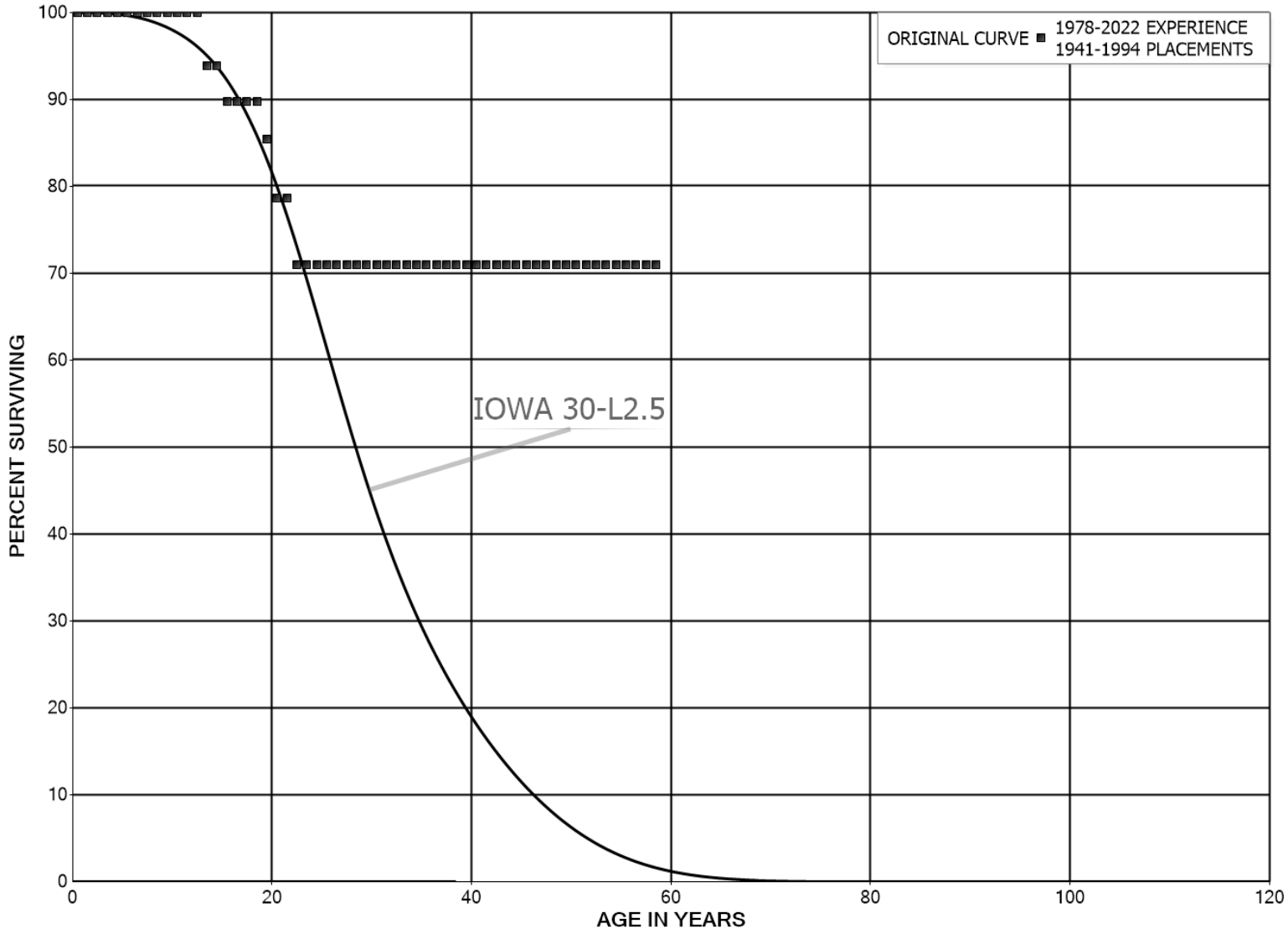
ACCOUNT 325.4 RIGHTS OF WAY

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1941-2012 EXPERIENCE BAND 1975-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	980		0.0000	1.0000	99.55
80.5	980		0.0000	1.0000	99.55
81.5					99.55

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 328 MEASURING AND REGULATING STATION STRUCTURES
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 328 MEASURING AND REGULATING STATION STRUCTURES

ORIGINAL LIFE TABLE

PLACEMENT BAND 1941-1994 EXPERIENCE BAND 1978-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	3,223		0.0000	1.0000	100.00
0.5	3,223		0.0000	1.0000	100.00
1.5	3,389		0.0000	1.0000	100.00
2.5	3,389		0.0000	1.0000	100.00
3.5	3,389		0.0000	1.0000	100.00
4.5	4,179		0.0000	1.0000	100.00
5.5	4,179		0.0000	1.0000	100.00
6.5	4,179		0.0000	1.0000	100.00
7.5	4,179		0.0000	1.0000	100.00
8.5	4,179		0.0000	1.0000	100.00
9.5	5,322		0.0000	1.0000	100.00
10.5	6,117		0.0000	1.0000	100.00
11.5	6,177		0.0000	1.0000	100.00
12.5	8,937	548	0.0614	0.9386	100.00
13.5	11,970		0.0000	1.0000	93.86
14.5	12,578	557	0.0443	0.9557	93.86
15.5	12,541		0.0000	1.0000	89.71
16.5	12,541		0.0000	1.0000	89.71
17.5	12,541		0.0000	1.0000	89.71
18.5	12,541	600	0.0478	0.9522	89.71
19.5	11,941	957	0.0801	0.9199	85.41
20.5	10,984		0.0000	1.0000	78.57
21.5	10,984	1,073	0.0977	0.9023	78.57
22.5	9,911		0.0000	1.0000	70.89
23.5	9,977		0.0000	1.0000	70.89
24.5	9,977		0.0000	1.0000	70.89
25.5	9,977		0.0000	1.0000	70.89
26.5	9,977		0.0000	1.0000	70.89
27.5	9,977		0.0000	1.0000	70.89
28.5	7,963		0.0000	1.0000	70.89
29.5	7,963		0.0000	1.0000	70.89
30.5	7,963		0.0000	1.0000	70.89
31.5	7,963		0.0000	1.0000	70.89
32.5	7,963		0.0000	1.0000	70.89
33.5	7,963		0.0000	1.0000	70.89
34.5	7,963		0.0000	1.0000	70.89
35.5	7,963		0.0000	1.0000	70.89
36.5	7,963		0.0000	1.0000	70.89
37.5	7,914		0.0000	1.0000	70.89
38.5	7,914		0.0000	1.0000	70.89

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 328 MEASURING AND REGULATING STATION STRUCTURES

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1941-1994 EXPERIENCE BAND 1978-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	7,914		0.0000	1.0000	70.89
40.5	7,914		0.0000	1.0000	70.89
41.5	7,914		0.0000	1.0000	70.89
42.5	7,914		0.0000	1.0000	70.89
43.5	7,914		0.0000	1.0000	70.89
44.5	6,706		0.0000	1.0000	70.89
45.5	6,706		0.0000	1.0000	70.89
46.5	6,706		0.0000	1.0000	70.89
47.5	6,706		0.0000	1.0000	70.89
48.5	5,916		0.0000	1.0000	70.89
49.5	5,916		0.0000	1.0000	70.89
50.5	5,916		0.0000	1.0000	70.89
51.5	5,916		0.0000	1.0000	70.89
52.5	5,916		0.0000	1.0000	70.89
53.5	5,373		0.0000	1.0000	70.89
54.5	5,373		0.0000	1.0000	70.89
55.5	5,313		0.0000	1.0000	70.89
56.5	4,175		0.0000	1.0000	70.89
57.5	1,150		0.0000	1.0000	70.89
58.5	543		0.0000	1.0000	70.89
59.5	185		0.0000	1.0000	70.89
60.5	185		0.0000	1.0000	70.89
61.5	185		0.0000	1.0000	70.89
62.5	185		0.0000	1.0000	70.89
63.5	185		0.0000	1.0000	70.89
64.5	185		0.0000	1.0000	70.89
65.5	185		0.0000	1.0000	70.89
66.5	185		0.0000	1.0000	70.89
67.5	118		0.0000	1.0000	70.89
68.5	118		0.0000	1.0000	70.89
69.5	118		0.0000	1.0000	70.89
70.5	118		0.0000	1.0000	70.89
71.5	118		0.0000	1.0000	70.89
72.5	118		0.0000	1.0000	70.89
73.5	118		0.0000	1.0000	70.89
74.5	118		0.0000	1.0000	70.89
75.5	118		0.0000	1.0000	70.89
76.5	118		0.0000	1.0000	70.89
77.5	118		0.0000	1.0000	70.89
78.5	118		0.0000	1.0000	70.89

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

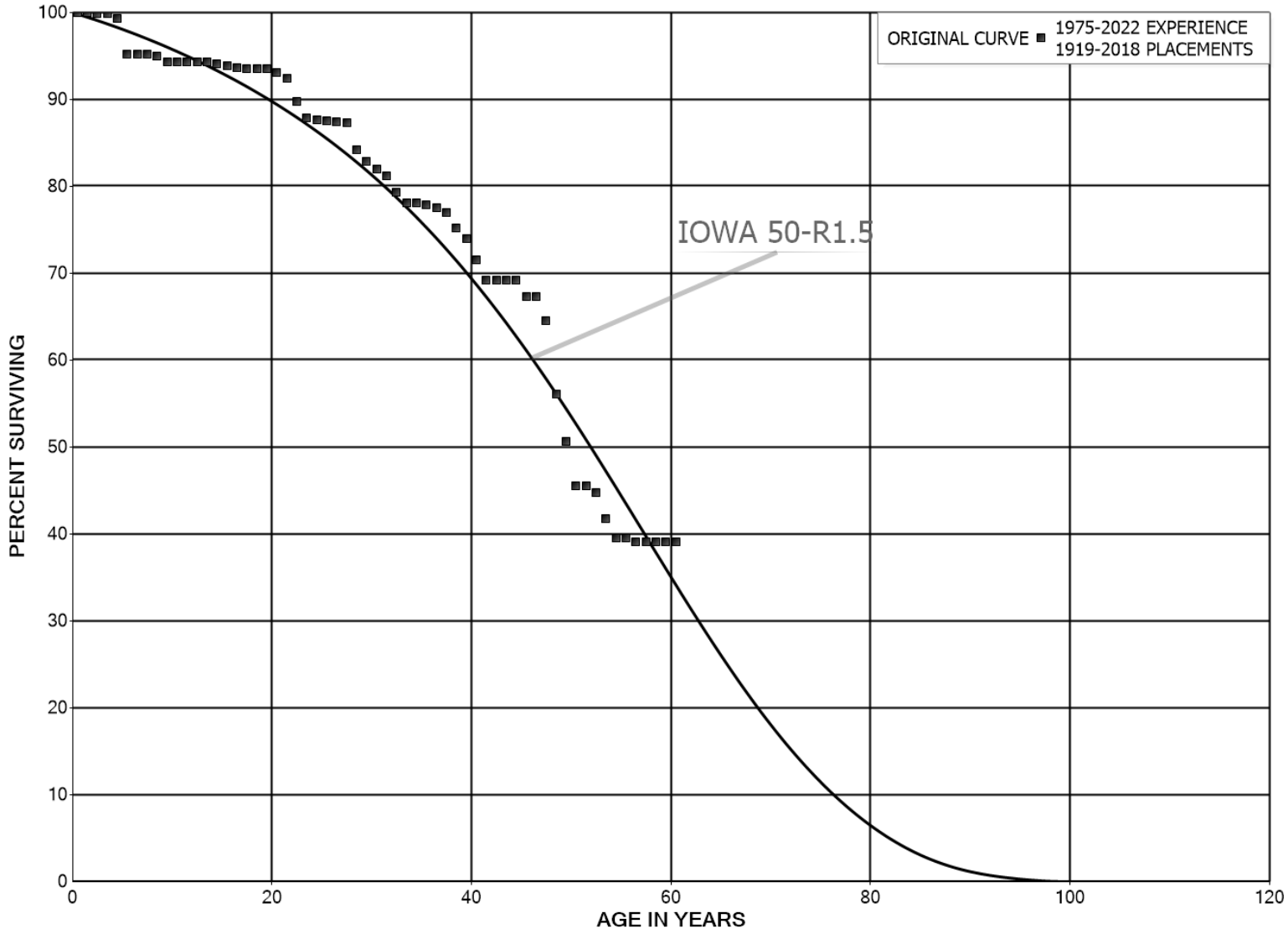
ACCOUNT 328 MEASURING AND REGULATING STATION STRUCTURES

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1941-1994 EXPERIENCE BAND 1978-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	118		0.0000	1.0000	70.89
80.5	118		0.0000	1.0000	70.89
81.5					70.89

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 332 FIELD LINES
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 332 FIELD LINES

ORIGINAL LIFE TABLE

PLACEMENT BAND 1919-2018 EXPERIENCE BAND 1975-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	1,125,846		0.0000	1.0000	100.00
0.5	1,142,030		0.0000	1.0000	100.00
1.5	1,086,543	1,326	0.0012	0.9988	100.00
2.5	750,372		0.0000	1.0000	99.88
3.5	750,063	4,120	0.0055	0.9945	99.88
4.5	660,644	27,422	0.0415	0.9585	99.33
5.5	652,530		0.0000	1.0000	95.21
6.5	676,687		0.0000	1.0000	95.21
7.5	455,013	1,124	0.0025	0.9975	95.21
8.5	463,392	3,235	0.0070	0.9930	94.97
9.5	461,488	147	0.0003	0.9997	94.31
10.5	466,300		0.0000	1.0000	94.28
11.5	519,297		0.0000	1.0000	94.28
12.5	559,226		0.0000	1.0000	94.28
13.5	562,770	1,395	0.0025	0.9975	94.28
14.5	565,190	1,243	0.0022	0.9978	94.04
15.5	617,628	1,639	0.0027	0.9973	93.84
16.5	681,192	340	0.0005	0.9995	93.59
17.5	729,642		0.0000	1.0000	93.54
18.5	734,737	543	0.0007	0.9993	93.54
19.5	733,585	3,506	0.0048	0.9952	93.47
20.5	711,704	4,570	0.0064	0.9936	93.03
21.5	671,033	19,909	0.0297	0.9703	92.43
22.5	648,543	13,531	0.0209	0.9791	89.69
23.5	625,611	1,638	0.0026	0.9974	87.82
24.5	623,973	299	0.0005	0.9995	87.59
25.5	626,570	1,314	0.0021	0.9979	87.54
26.5	628,411	679	0.0011	0.9989	87.36
27.5	627,343	22,485	0.0358	0.9642	87.27
28.5	601,929	9,135	0.0152	0.9848	84.14
29.5	482,217	5,507	0.0114	0.9886	82.86
30.5	472,214	4,535	0.0096	0.9904	81.91
31.5	193,864	4,522	0.0233	0.9767	81.13
32.5	188,915	2,726	0.0144	0.9856	79.24
33.5	186,189	23	0.0001	0.9999	78.09
34.5	186,559	567	0.0030	0.9970	78.08
35.5	185,991	913	0.0049	0.9951	77.85
36.5	170,019	1,045	0.0061	0.9939	77.46
37.5	228,112	5,488	0.0241	0.9759	76.99
38.5	222,691	3,656	0.0164	0.9836	75.13

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

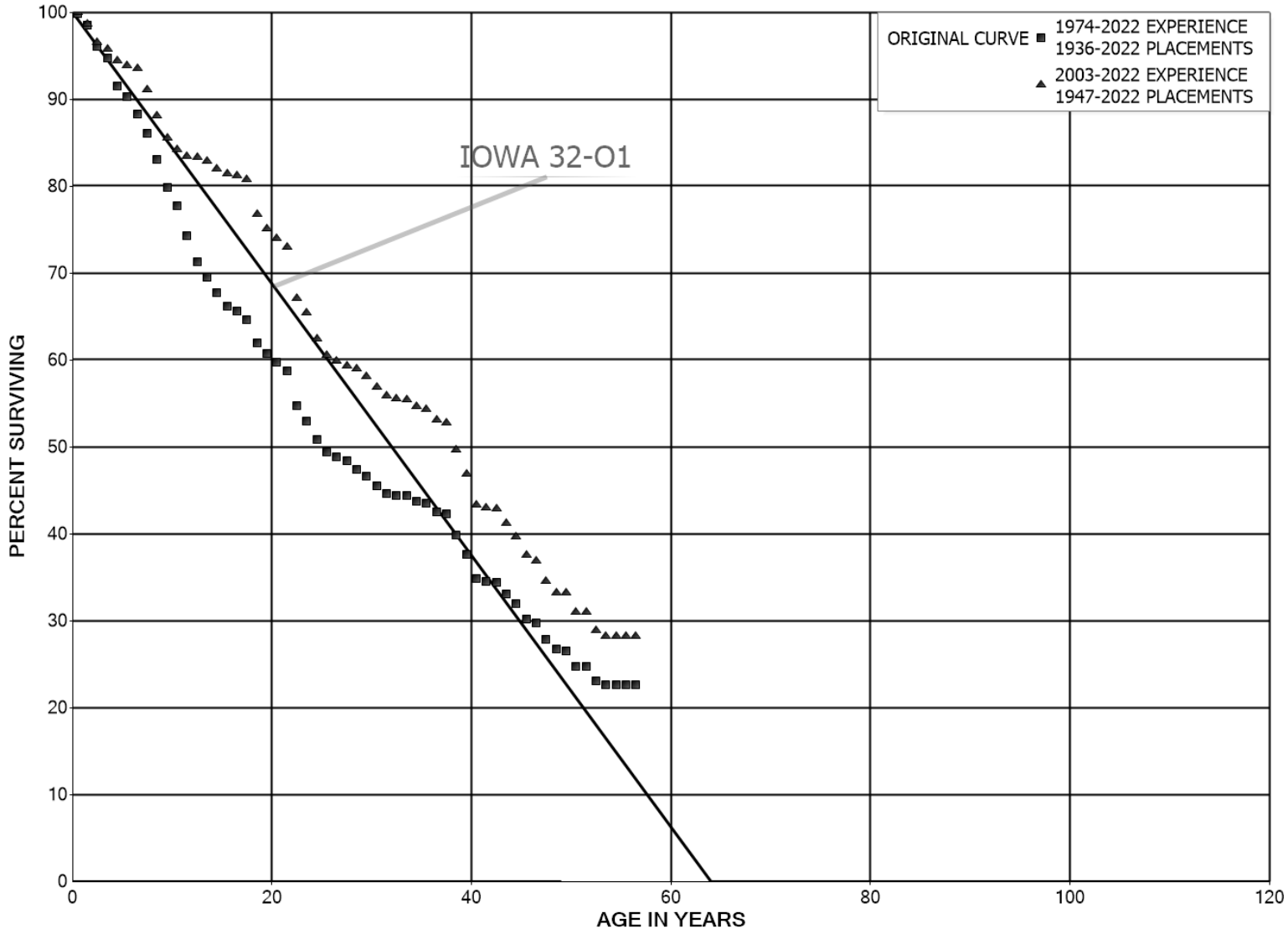
ACCOUNT 332 FIELD LINES

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1919-2018 EXPERIENCE BAND 1975-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	213,505	7,026	0.0329	0.9671	73.90
40.5	207,544	6,623	0.0319	0.9681	71.47
41.5	200,922		0.0000	1.0000	69.19
42.5	200,922	15	0.0001	0.9999	69.19
43.5	200,906		0.0000	1.0000	69.18
44.5	200,906	5,610	0.0279	0.9721	69.18
45.5	195,296	37	0.0002	0.9998	67.25
46.5	194,866	7,806	0.0401	0.9599	67.24
47.5	187,060	24,707	0.1321	0.8679	64.55
48.5	162,354	15,688	0.0966	0.9034	56.02
49.5	90,780	9,095	0.1002	0.8998	50.61
50.5	81,686	21	0.0003	0.9997	45.54
51.5	81,664	1,460	0.0179	0.9821	45.53
52.5	80,204	5,392	0.0672	0.9328	44.71
53.5	73,499	3,931	0.0535	0.9465	41.71
54.5	69,475		0.0000	1.0000	39.47
55.5	58,557	535	0.0091	0.9909	39.47
56.5	53,943		0.0000	1.0000	39.11
57.5	47,346		0.0000	1.0000	39.11
58.5	47,346		0.0000	1.0000	39.11
59.5	47,348		0.0000	1.0000	39.11
60.5	706		0.0000	1.0000	39.11
61.5	2		0.0000	1.0000	39.11
62.5	2		0.0000	1.0000	39.11
63.5	2		0.0000	1.0000	39.11
64.5	2		0.0000	1.0000	39.11
65.5	2		0.0000	1.0000	39.11
66.5	2		0.0000	1.0000	39.11
67.5	2		0.0000	1.0000	39.11
68.5	2		0.0000	1.0000	39.11
69.5	2		0.0000	1.0000	39.11
70.5	2	2	1.0000		39.11
71.5					

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 334 MEASURING AND REGULATING STATION EQUIPMENT
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 334 MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1936-2022 EXPERIENCE BAND 1974-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	4,027,653	6,432	0.0016	0.9984	100.00
0.5	4,026,882	55,500	0.0138	0.9862	99.84
1.5	3,925,526	93,984	0.0239	0.9761	98.46
2.5	3,670,814	53,668	0.0146	0.9854	96.11
3.5	3,533,562	120,512	0.0341	0.9659	94.70
4.5	3,324,018	44,831	0.0135	0.9865	91.47
5.5	3,195,948	70,909	0.0222	0.9778	90.24
6.5	3,180,883	79,339	0.0249	0.9751	88.24
7.5	3,108,565	107,113	0.0345	0.9655	86.04
8.5	2,977,925	115,176	0.0387	0.9613	83.07
9.5	2,702,306	71,917	0.0266	0.9734	79.86
10.5	2,592,284	116,730	0.0450	0.9550	77.73
11.5	2,220,722	89,497	0.0403	0.9597	74.23
12.5	2,097,352	52,314	0.0249	0.9751	71.24
13.5	2,016,214	51,987	0.0258	0.9742	69.46
14.5	1,847,638	39,734	0.0215	0.9785	67.67
15.5	1,658,288	14,029	0.0085	0.9915	66.22
16.5	1,573,575	24,664	0.0157	0.9843	65.66
17.5	1,476,616	61,214	0.0415	0.9585	64.63
18.5	1,369,120	27,602	0.0202	0.9798	61.95
19.5	1,284,078	21,361	0.0166	0.9834	60.70
20.5	1,170,533	19,196	0.0164	0.9836	59.69
21.5	1,078,823	72,384	0.0671	0.9329	58.71
22.5	1,006,004	33,197	0.0330	0.9670	54.77
23.5	952,589	38,087	0.0400	0.9600	52.96
24.5	917,859	26,832	0.0292	0.9708	50.85
25.5	880,363	9,802	0.0111	0.9889	49.36
26.5	870,788	7,997	0.0092	0.9908	48.81
27.5	842,594	16,002	0.0190	0.9810	48.36
28.5	786,024	12,829	0.0163	0.9837	47.44
29.5	733,906	18,360	0.0250	0.9750	46.67
30.5	696,954	13,605	0.0195	0.9805	45.50
31.5	631,639	2,886	0.0046	0.9954	44.61
32.5	603,622	772	0.0013	0.9987	44.41
33.5	551,018	7,758	0.0141	0.9859	44.35
34.5	500,454	2,511	0.0050	0.9950	43.73
35.5	436,166	10,084	0.0231	0.9769	43.51
36.5	393,364	1,976	0.0050	0.9950	42.50
37.5	324,521	19,021	0.0586	0.9414	42.29
38.5	285,204	15,715	0.0551	0.9449	39.81

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 334 MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1936-2022 EXPERIENCE BAND 1974-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	242,795	18,145	0.0747	0.9253	37.62
40.5	192,567	1,728	0.0090	0.9910	34.81
41.5	173,937	552	0.0032	0.9968	34.49
42.5	158,158	5,900	0.0373	0.9627	34.38
43.5	90,461	3,250	0.0359	0.9641	33.10
44.5	50,328	2,688	0.0534	0.9466	31.91
45.5	43,160	722	0.0167	0.9833	30.21
46.5	26,656	1,648	0.0618	0.9382	29.70
47.5	24,283	981	0.0404	0.9596	27.87
48.5	23,199	169	0.0073	0.9927	26.74
49.5	22,312	1,494	0.0670	0.9330	26.55
50.5	20,818		0.0000	1.0000	24.77
51.5	20,701	1,400	0.0676	0.9324	24.77
52.5	19,301	424	0.0220	0.9780	23.09
53.5	18,378		0.0000	1.0000	22.59
54.5	18,378		0.0000	1.0000	22.59
55.5	13,546		0.0000	1.0000	22.59
56.5	7,133		0.0000	1.0000	22.59
57.5	2,600		0.0000	1.0000	22.59
58.5	2,248		0.0000	1.0000	22.59
59.5	2,248		0.0000	1.0000	22.59
60.5	2,248		0.0000	1.0000	22.59
61.5	2,248		0.0000	1.0000	22.59
62.5	2,248		0.0000	1.0000	22.59
63.5	2,248		0.0000	1.0000	22.59
64.5	43		0.0000	1.0000	22.59
65.5	43		0.0000	1.0000	22.59
66.5	43		0.0000	1.0000	22.59
67.5	43		0.0000	1.0000	22.59
68.5	43		0.0000	1.0000	22.59
69.5	43		0.0000	1.0000	22.59
70.5	43		0.0000	1.0000	22.59
71.5	43		0.0000	1.0000	22.59
72.5	43		0.0000	1.0000	22.59
73.5	43		0.0000	1.0000	22.59
74.5	43		0.0000	1.0000	22.59
75.5					22.59

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 334 MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1947-2022 EXPERIENCE BAND 2003-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	2,446,581	2,174	0.0009	0.9991	100.00
0.5	2,470,420	30,969	0.0125	0.9875	99.91
1.5	2,437,875	53,496	0.0219	0.9781	98.66
2.5	2,206,860	18,282	0.0083	0.9917	96.49
3.5	2,105,340	27,717	0.0132	0.9868	95.69
4.5	1,968,086	11,533	0.0059	0.9941	94.43
5.5	1,793,603	7,797	0.0043	0.9957	93.88
6.5	1,702,206	43,062	0.0253	0.9747	93.47
7.5	1,656,309	55,858	0.0337	0.9663	91.11
8.5	1,568,378	45,947	0.0293	0.9707	88.04
9.5	1,356,864	20,527	0.0151	0.9849	85.46
10.5	1,288,376	11,774	0.0091	0.9909	84.16
11.5	1,065,702	1,835	0.0017	0.9983	83.39
12.5	1,051,759	5,677	0.0054	0.9946	83.25
13.5	1,094,132	11,404	0.0104	0.9896	82.80
14.5	1,031,172	7,514	0.0073	0.9927	81.94
15.5	968,766	1,771	0.0018	0.9982	81.34
16.5	991,462	5,845	0.0059	0.9941	81.19
17.5	1,014,528	50,062	0.0493	0.9507	80.71
18.5	939,396	20,586	0.0219	0.9781	76.73
19.5	893,834	12,672	0.0142	0.9858	75.05
20.5	835,220	12,162	0.0146	0.9854	73.99
21.5	779,797	62,053	0.0796	0.9204	72.91
22.5	733,469	18,552	0.0253	0.9747	67.11
23.5	805,380	36,902	0.0458	0.9542	65.41
24.5	830,785	25,584	0.0308	0.9692	62.41
25.5	810,945	9,520	0.0117	0.9883	60.49
26.5	817,129	6,808	0.0083	0.9917	59.78
27.5	790,137	3,753	0.0047	0.9953	59.28
28.5	747,366	11,263	0.0151	0.9849	59.00
29.5	697,370	15,612	0.0224	0.9776	58.11
30.5	663,278	11,987	0.0181	0.9819	56.81
31.5	600,649	2,886	0.0048	0.9952	55.78
32.5	575,636	772	0.0013	0.9987	55.52
33.5	523,532	7,758	0.0148	0.9852	55.44
34.5	472,749	2,511	0.0053	0.9947	54.62
35.5	414,619	9,764	0.0235	0.9765	54.33
36.5	384,105	1,976	0.0051	0.9949	53.05
37.5	321,106	19,021	0.0592	0.9408	52.78
38.5	282,142	15,715	0.0557	0.9443	49.65

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

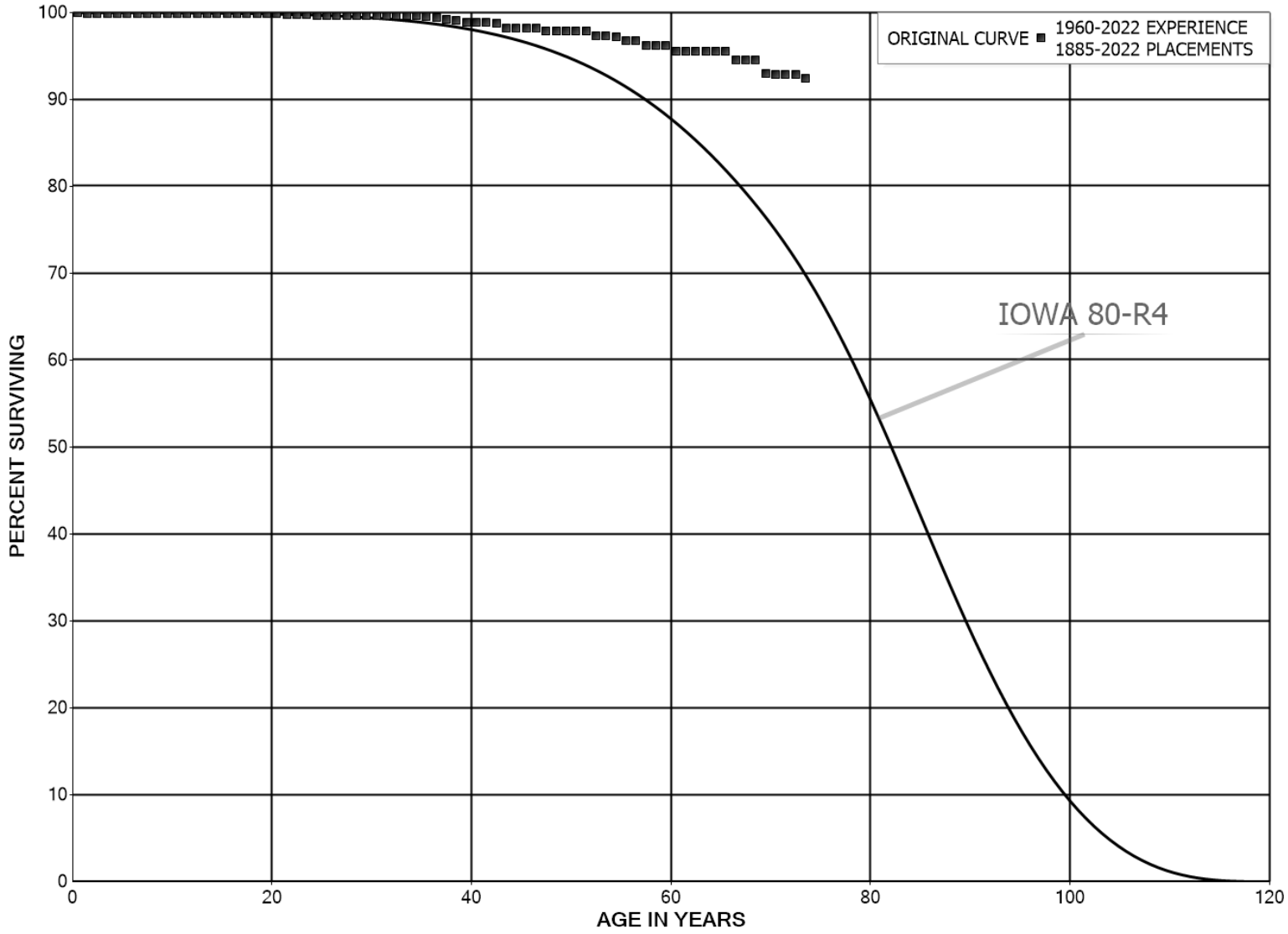
ACCOUNT 334 MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1947-2022 EXPERIENCE BAND 2003-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	239,732	18,145	0.0757	0.9243	46.89
40.5	189,505	1,728	0.0091	0.9909	43.34
41.5	170,874	552	0.0032	0.9968	42.94
42.5	155,096	5,900	0.0380	0.9620	42.80
43.5	87,398	3,250	0.0372	0.9628	41.17
44.5	49,851	2,688	0.0539	0.9461	39.64
45.5	42,519	722	0.0170	0.9830	37.51
46.5	26,179	1,648	0.0629	0.9371	36.87
47.5	23,805	981	0.0412	0.9588	34.55
48.5	22,722		0.0000	1.0000	33.13
49.5	22,269	1,494	0.0671	0.9329	33.13
50.5	20,774		0.0000	1.0000	30.90
51.5	20,658	1,400	0.0678	0.9322	30.90
52.5	19,257	424	0.0220	0.9780	28.81
53.5	18,335		0.0000	1.0000	28.17
54.5	18,335		0.0000	1.0000	28.17
55.5	13,546		0.0000	1.0000	28.17
56.5	7,133		0.0000	1.0000	28.17
57.5	2,600		0.0000	1.0000	28.17
58.5	2,248		0.0000	1.0000	28.17
59.5	2,248		0.0000	1.0000	28.17
60.5	2,248		0.0000	1.0000	28.17
61.5	2,248		0.0000	1.0000	28.17
62.5	2,248		0.0000	1.0000	28.17
63.5	2,248		0.0000	1.0000	28.17
64.5	43		0.0000	1.0000	28.17
65.5	43		0.0000	1.0000	28.17
66.5	43		0.0000	1.0000	28.17
67.5	43		0.0000	1.0000	28.17
68.5	43		0.0000	1.0000	28.17
69.5	43		0.0000	1.0000	28.17
70.5	43		0.0000	1.0000	28.17
71.5	43		0.0000	1.0000	28.17
72.5	43		0.0000	1.0000	28.17
73.5	43		0.0000	1.0000	28.17
74.5	43		0.0000	1.0000	28.17
75.5					28.17

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 365.2 RIGHTS OF WAY
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 365.2 RIGHTS OF WAY

ORIGINAL LIFE TABLE

PLACEMENT BAND 1885-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	2,358,365	1,722	0.0007	0.9993	100.00
0.5	2,433,415	1,882	0.0008	0.9992	99.93
1.5	2,217,082		0.0000	1.0000	99.85
2.5	2,101,659	241	0.0001	0.9999	99.85
3.5	1,771,872		0.0000	1.0000	99.84
4.5	1,763,362	27	0.0000	1.0000	99.84
5.5	1,709,863		0.0000	1.0000	99.84
6.5	1,512,995		0.0000	1.0000	99.84
7.5	1,480,502		0.0000	1.0000	99.84
8.5	1,367,285	1	0.0000	1.0000	99.84
9.5	1,392,952	78	0.0001	0.9999	99.84
10.5	1,394,432	271	0.0002	0.9998	99.83
11.5	1,374,982	14	0.0000	1.0000	99.81
12.5	1,341,806	15	0.0000	1.0000	99.81
13.5	1,208,115	20	0.0000	1.0000	99.81
14.5	1,202,284		0.0000	1.0000	99.81
15.5	1,029,079	8	0.0000	1.0000	99.81
16.5	1,027,773	19	0.0000	1.0000	99.81
17.5	1,026,184		0.0000	1.0000	99.81
18.5	1,011,157	7	0.0000	1.0000	99.81
19.5	954,521	127	0.0001	0.9999	99.80
20.5	920,692	822	0.0009	0.9991	99.79
21.5	898,449	13	0.0000	1.0000	99.70
22.5	887,883		0.0000	1.0000	99.70
23.5	774,922	806	0.0010	0.9990	99.70
24.5	768,266	26	0.0000	1.0000	99.60
25.5	713,426		0.0000	1.0000	99.59
26.5	692,144	38	0.0001	0.9999	99.59
27.5	667,962	2	0.0000	1.0000	99.59
28.5	664,925	4	0.0000	1.0000	99.59
29.5	626,356		0.0000	1.0000	99.59
30.5	597,773	29	0.0000	1.0000	99.59
31.5	477,268		0.0000	1.0000	99.58
32.5	443,028	6	0.0000	1.0000	99.58
33.5	443,024	58	0.0001	0.9999	99.58
34.5	275,427	84	0.0003	0.9997	99.57
35.5	246,933	432	0.0018	0.9982	99.54
36.5	226,700	495	0.0022	0.9978	99.36
37.5	224,124	149	0.0007	0.9993	99.15
38.5	204,716	468	0.0023	0.9977	99.08

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 365.2 RIGHTS OF WAY

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1885-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	202,395		0.0000	1.0000	98.85
40.5	194,010	122	0.0006	0.9994	98.85
41.5	173,368	85	0.0005	0.9995	98.79
42.5	166,259	884	0.0053	0.9947	98.74
43.5	177,568	42	0.0002	0.9998	98.22
44.5	167,751		0.0000	1.0000	98.19
45.5	155,922		0.0000	1.0000	98.19
46.5	155,737	580	0.0037	0.9963	98.19
47.5	152,118		0.0000	1.0000	97.83
48.5	146,027	31	0.0002	0.9998	97.83
49.5	143,326		0.0000	1.0000	97.81
50.5	142,312		0.0000	1.0000	97.81
51.5	133,198	748	0.0056	0.9944	97.81
52.5	131,539	3	0.0000	1.0000	97.26
53.5	126,136	40	0.0003	0.9997	97.26
54.5	123,117	616	0.0050	0.9950	97.23
55.5	103,020		0.0000	1.0000	96.74
56.5	95,943	602	0.0063	0.9937	96.74
57.5	73,616		0.0000	1.0000	96.13
58.5	71,291		0.0000	1.0000	96.13
59.5	68,991	414	0.0060	0.9940	96.13
60.5	69,545		0.0000	1.0000	95.56
61.5	63,631		0.0000	1.0000	95.56
62.5	63,328		0.0000	1.0000	95.56
63.5	62,534	41	0.0007	0.9993	95.56
64.5	62,490		0.0000	1.0000	95.49
65.5	54,538	569	0.0104	0.9896	95.49
66.5	36,523		0.0000	1.0000	94.50
67.5	35,713		0.0000	1.0000	94.50
68.5	35,333	574	0.0162	0.9838	94.50
69.5	34,239	48	0.0014	0.9986	92.96
70.5	34,179		0.0000	1.0000	92.83
71.5	32,805		0.0000	1.0000	92.83
72.5	32,501	161	0.0050	0.9950	92.83
73.5	35,203	770	0.0219	0.9781	92.37
74.5	37,821		0.0000	1.0000	90.35
75.5	36,828	30	0.0008	0.9992	90.35
76.5	36,404		0.0000	1.0000	90.28
77.5	36,386	168	0.0046	0.9954	90.28
78.5	36,164		0.0000	1.0000	89.86

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

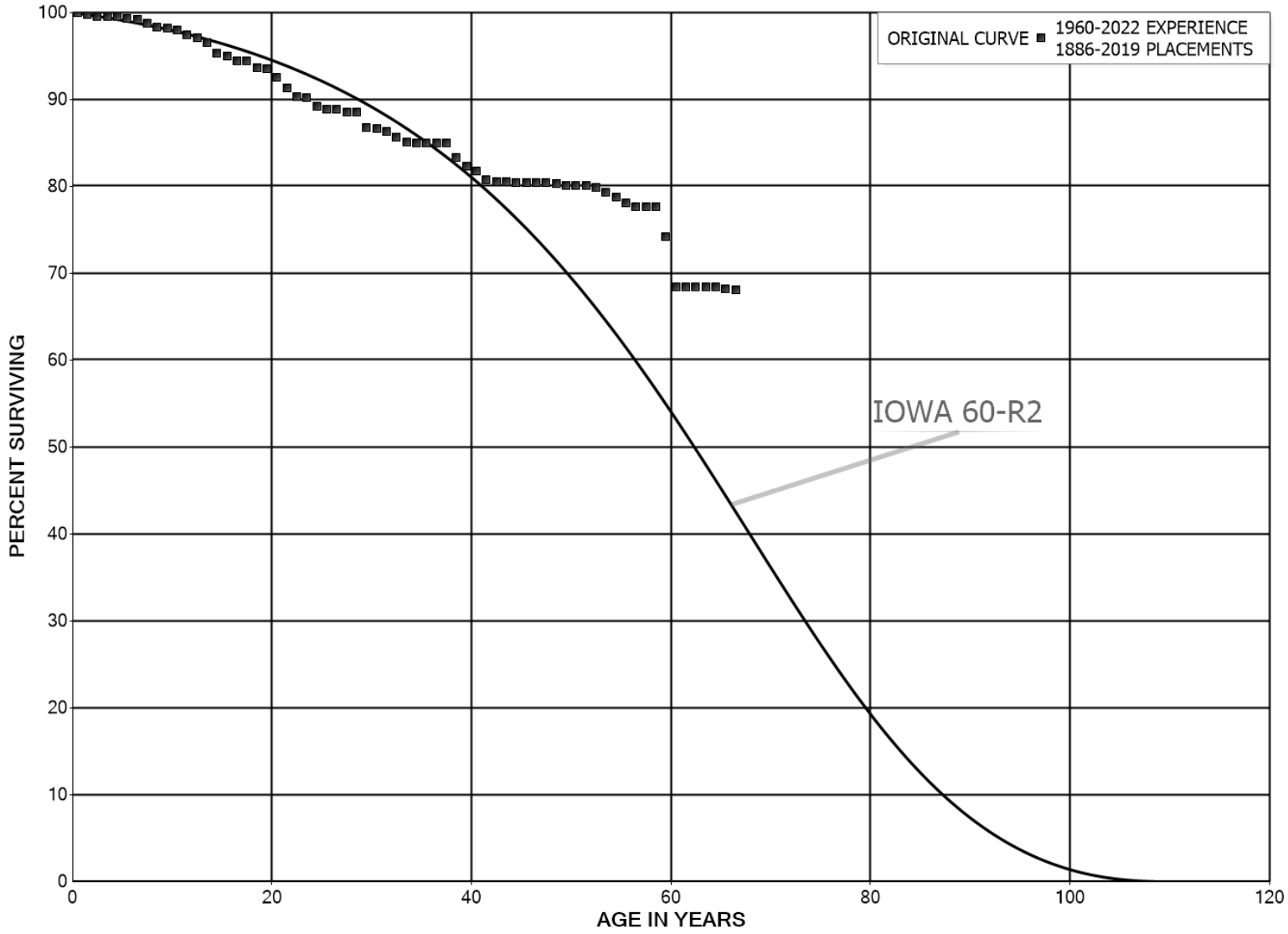
ACCOUNT 365.2 RIGHTS OF WAY

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1885-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	34,887	50	0.0014	0.9986	89.86
80.5	34,538	48	0.0014	0.9986	89.73
81.5	33,554	689	0.0205	0.9795	89.61
82.5	32,689	307	0.0094	0.9906	87.77
83.5	31,941	537	0.0168	0.9832	86.95
84.5	30,901		0.0000	1.0000	85.48
85.5	30,786	53	0.0017	0.9983	85.48
86.5	30,188	852	0.0282	0.9718	85.34
87.5	29,293		0.0000	1.0000	82.93
88.5	25,598		0.0000	1.0000	82.93
89.5	22,160		0.0000	1.0000	82.93
90.5	21,732		0.0000	1.0000	82.93
91.5	21,678		0.0000	1.0000	82.93
92.5	21,031		0.0000	1.0000	82.93
93.5	18,147		0.0000	1.0000	82.93
94.5	16,505		0.0000	1.0000	82.93
95.5	16,504		0.0000	1.0000	82.93
96.5	16,072		0.0000	1.0000	82.93
97.5	15,950		0.0000	1.0000	82.93
98.5	15,911		0.0000	1.0000	82.93
99.5	15,745		0.0000	1.0000	82.93
100.5	15,594		0.0000	1.0000	82.93
101.5	15,456		0.0000	1.0000	82.93
102.5	11,853		0.0000	1.0000	82.93
103.5	11,811		0.0000	1.0000	82.93
104.5	10,897		0.0000	1.0000	82.93
105.5	10,864		0.0000	1.0000	82.93
106.5					82.93

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 366 STRUCTURES AND IMPROVEMENTS
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 366 STRUCTURES AND IMPROVEMENTS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1886-2019 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	269,168		0.0000	1.0000	100.00
0.5	281,210	725	0.0026	0.9974	100.00
1.5	315,468	699	0.0022	0.9978	99.74
2.5	330,066	117	0.0004	0.9996	99.52
3.5	340,892		0.0000	1.0000	99.49
4.5	334,294	688	0.0021	0.9979	99.49
5.5	337,653	483	0.0014	0.9986	99.28
6.5	392,467	1,423	0.0036	0.9964	99.14
7.5	384,050	1,922	0.0050	0.9950	98.78
8.5	401,169	559	0.0014	0.9986	98.29
9.5	366,722	553	0.0015	0.9985	98.15
10.5	354,529	2,381	0.0067	0.9933	98.00
11.5	345,080	841	0.0024	0.9976	97.34
12.5	339,977	2,018	0.0059	0.9941	97.11
13.5	326,920	4,236	0.0130	0.9870	96.53
14.5	317,597	1,119	0.0035	0.9965	95.28
15.5	323,611	1,860	0.0057	0.9943	94.94
16.5	311,638		0.0000	1.0000	94.40
17.5	304,973	2,586	0.0085	0.9915	94.40
18.5	298,373	462	0.0015	0.9985	93.60
19.5	280,984	2,803	0.0100	0.9900	93.45
20.5	269,725	3,608	0.0134	0.9866	92.52
21.5	218,266	2,284	0.0105	0.9895	91.28
22.5	211,471	409	0.0019	0.9981	90.33
23.5	176,011	1,882	0.0107	0.9893	90.15
24.5	168,637	581	0.0034	0.9966	89.19
25.5	161,589		0.0000	1.0000	88.88
26.5	159,289	614	0.0039	0.9961	88.88
27.5	159,710	86	0.0005	0.9995	88.54
28.5	163,032	3,215	0.0197	0.9803	88.49
29.5	159,459	225	0.0014	0.9986	86.74
30.5	160,795	650	0.0040	0.9960	86.62
31.5	150,622	1,054	0.0070	0.9930	86.27
32.5	149,299	1,025	0.0069	0.9931	85.67
33.5	150,747	277	0.0018	0.9982	85.08
34.5	128,421	50	0.0004	0.9996	84.92
35.5	127,028		0.0000	1.0000	84.89
36.5	125,136		0.0000	1.0000	84.89
37.5	120,039	2,269	0.0189	0.9811	84.89
38.5	112,042	1,415	0.0126	0.9874	83.29

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 366 STRUCTURES AND IMPROVEMENTS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1886-2019 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	109,291	702	0.0064	0.9936	82.23
40.5	109,550	1,349	0.0123	0.9877	81.71
41.5	109,200	207	0.0019	0.9981	80.70
42.5	108,445	90	0.0008	0.9992	80.55
43.5	105,289	46	0.0004	0.9996	80.48
44.5	105,267	17	0.0002	0.9998	80.45
45.5	100,325		0.0000	1.0000	80.43
46.5	98,986	98	0.0010	0.9990	80.43
47.5	99,138	43	0.0004	0.9996	80.35
48.5	97,938	252	0.0026	0.9974	80.32
49.5	95,642	77	0.0008	0.9992	80.11
50.5	91,296		0.0000	1.0000	80.05
51.5	85,823	240	0.0028	0.9972	80.05
52.5	84,391	625	0.0074	0.9926	79.82
53.5	83,608	527	0.0063	0.9937	79.23
54.5	83,042	669	0.0081	0.9919	78.73
55.5	74,913	436	0.0058	0.9942	78.10
56.5	65,157		0.0000	1.0000	77.64
57.5	54,029	23	0.0004	0.9996	77.64
58.5	54,007	2,395	0.0444	0.9556	77.61
59.5	49,954	3,867	0.0774	0.9226	74.17
60.5	41,749		0.0000	1.0000	68.43
61.5	41,749		0.0000	1.0000	68.43
62.5	36,776		0.0000	1.0000	68.43
63.5	35,556		0.0000	1.0000	68.43
64.5	32,790	138	0.0042	0.9958	68.43
65.5	27,414	21	0.0008	0.9992	68.14
66.5	19,178		0.0000	1.0000	68.09
67.5	17,110		0.0000	1.0000	68.09
68.5	12,412		0.0000	1.0000	68.09
69.5	12,159		0.0000	1.0000	68.09
70.5	10,665	510	0.0478	0.9522	68.09
71.5	9,924		0.0000	1.0000	64.83
72.5	9,533	64	0.0067	0.9933	64.83
73.5	8,931		0.0000	1.0000	64.40
74.5	8,531		0.0000	1.0000	64.40
75.5	8,334		0.0000	1.0000	64.40
76.5	7,993		0.0000	1.0000	64.40
77.5	7,928	103	0.0130	0.9870	64.40
78.5	7,825	130	0.0166	0.9834	63.56

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

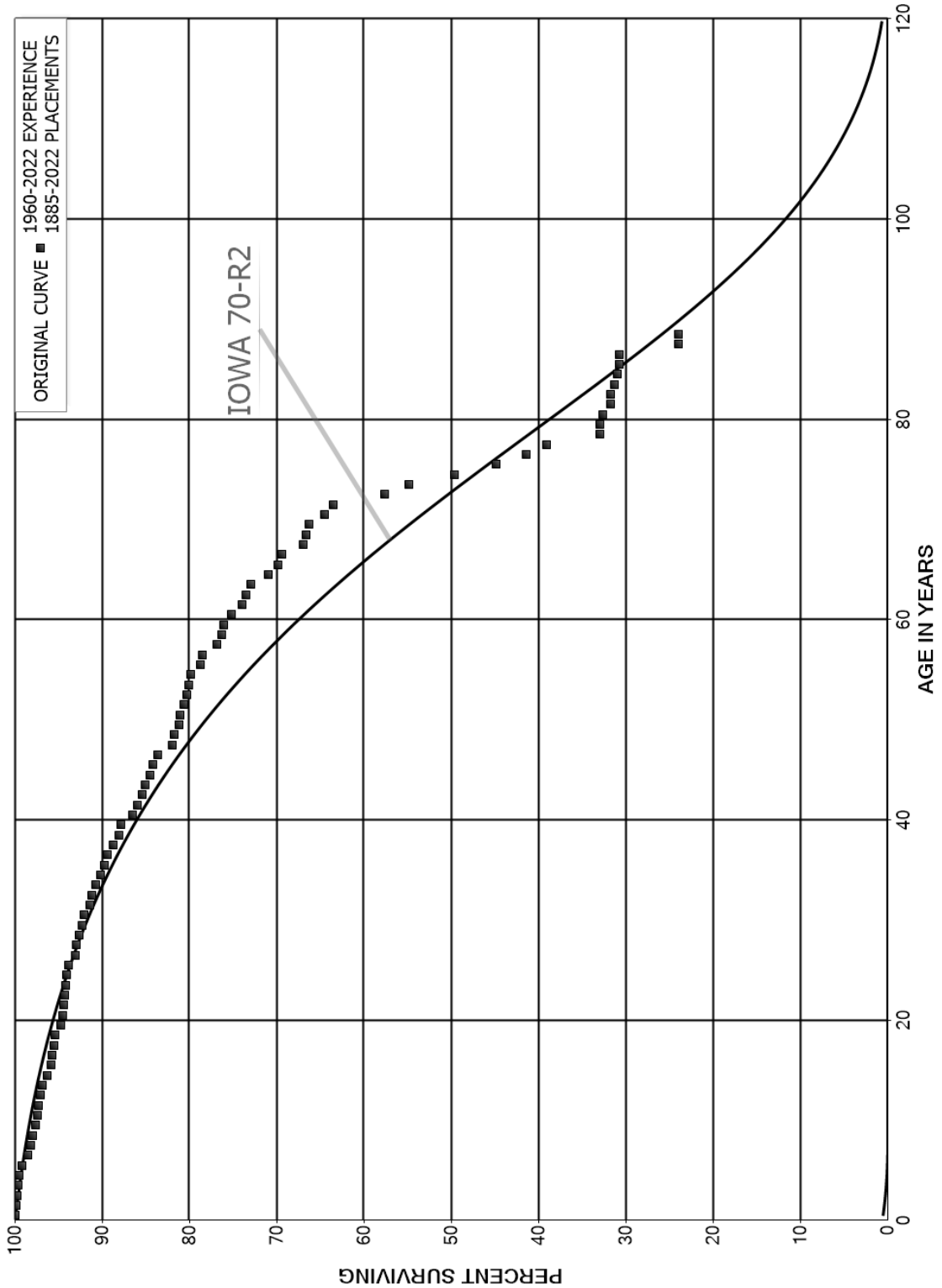
ACCOUNT 366 STRUCTURES AND IMPROVEMENTS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1886-2019 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	7,695		0.0000	1.0000	62.50
80.5	7,648		0.0000	1.0000	62.50
81.5	7,613		0.0000	1.0000	62.50
82.5	7,335		0.0000	1.0000	62.50
83.5	7,335		0.0000	1.0000	62.50
84.5	7,025	36	0.0051	0.9949	62.50
85.5	6,370		0.0000	1.0000	62.18
86.5	5,668		0.0000	1.0000	62.18
87.5	4,271		0.0000	1.0000	62.18
88.5	3,606		0.0000	1.0000	62.18
89.5	2,990		0.0000	1.0000	62.18
90.5	2,990		0.0000	1.0000	62.18
91.5	2,635		0.0000	1.0000	62.18
92.5	2,635		0.0000	1.0000	62.18
93.5	2,635		0.0000	1.0000	62.18
94.5	2,635		0.0000	1.0000	62.18
95.5	2,635		0.0000	1.0000	62.18
96.5	2,142		0.0000	1.0000	62.18
97.5	1,036		0.0000	1.0000	62.18
98.5	1,036		0.0000	1.0000	62.18
99.5	1,036		0.0000	1.0000	62.18
100.5	994		0.0000	1.0000	62.18
101.5	994		0.0000	1.0000	62.18
102.5	849		0.0000	1.0000	62.18
103.5	599		0.0000	1.0000	62.18
104.5	599		0.0000	1.0000	62.18
105.5	599		0.0000	1.0000	62.18
106.5					62.18

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 367.1 MAINS - EXCLUDING CATHODIC PROTECTION
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 367.1 MAINS - EXCLUDING CATHODIC PROTECTION

ORIGINAL LIFE TABLE

PLACEMENT BAND 1885-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	69,855,063	13,487	0.0002	0.9998	100.00
0.5	73,778,746	94,237	0.0013	0.9987	99.98
1.5	66,668,876	52,337	0.0008	0.9992	99.85
2.5	61,787,332	90,617	0.0015	0.9985	99.77
3.5	53,038,806	93,834	0.0018	0.9982	99.63
4.5	49,938,672	155,548	0.0031	0.9969	99.45
5.5	45,693,073	308,526	0.0068	0.9932	99.14
6.5	45,892,252	137,768	0.0030	0.9970	98.47
7.5	42,926,389	101,099	0.0024	0.9976	98.18
8.5	39,838,145	131,042	0.0033	0.9967	97.95
9.5	41,740,843	98,389	0.0024	0.9976	97.62
10.5	39,169,322	64,693	0.0017	0.9983	97.39
11.5	40,950,875	81,806	0.0020	0.9980	97.23
12.5	44,447,653	99,603	0.0022	0.9978	97.04
13.5	44,236,302	263,951	0.0060	0.9940	96.82
14.5	43,847,398	164,790	0.0038	0.9962	96.24
15.5	41,322,685	82,983	0.0020	0.9980	95.88
16.5	41,606,059	77,108	0.0019	0.9981	95.69
17.5	41,386,374	68,187	0.0016	0.9984	95.51
18.5	40,775,760	277,816	0.0068	0.9932	95.35
19.5	40,215,426	83,316	0.0021	0.9979	94.70
20.5	39,927,594	67,981	0.0017	0.9983	94.51
21.5	38,053,572	30,085	0.0008	0.9992	94.35
22.5	36,659,237	34,766	0.0009	0.9991	94.27
23.5	35,378,698	38,404	0.0011	0.9989	94.18
24.5	33,638,661	87,958	0.0026	0.9974	94.08
25.5	32,475,983	267,965	0.0083	0.9917	93.84
26.5	29,302,675	23,871	0.0008	0.9992	93.06
27.5	24,892,461	95,146	0.0038	0.9962	92.99
28.5	24,146,877	76,756	0.0032	0.9968	92.63
29.5	23,618,196	59,691	0.0025	0.9975	92.34
30.5	20,891,015	161,761	0.0077	0.9923	92.10
31.5	19,711,431	55,133	0.0028	0.9972	91.39
32.5	16,797,544	77,480	0.0046	0.9954	91.13
33.5	14,147,298	79,892	0.0056	0.9944	90.71
34.5	10,319,325	49,656	0.0048	0.9952	90.20
35.5	9,505,950	41,208	0.0043	0.9957	89.77
36.5	8,792,280	67,888	0.0077	0.9923	89.38
37.5	8,131,369	55,103	0.0068	0.9932	88.69
38.5	7,982,461	19,066	0.0024	0.9976	88.09

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 367.1 MAINS - EXCLUDING CATHODIC PROTECTION

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1885-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	7,179,611	112,829	0.0157	0.9843	87.88
40.5	6,995,382	41,374	0.0059	0.9941	86.50
41.5	7,283,888	47,431	0.0065	0.9935	85.98
42.5	6,911,907	31,112	0.0045	0.9955	85.42
43.5	7,333,662	47,833	0.0065	0.9935	85.04
44.5	7,258,926	30,994	0.0043	0.9957	84.48
45.5	6,818,863	36,910	0.0054	0.9946	84.12
46.5	6,612,938	140,102	0.0212	0.9788	83.67
47.5	6,316,801	15,725	0.0025	0.9975	81.90
48.5	6,073,436	39,258	0.0065	0.9935	81.69
49.5	5,337,540	5,916	0.0011	0.9989	81.16
50.5	5,148,477	32,608	0.0063	0.9937	81.07
51.5	5,099,715	18,017	0.0035	0.9965	80.56
52.5	5,041,045	15,200	0.0030	0.9970	80.28
53.5	4,821,167	15,255	0.0032	0.9968	80.03
54.5	4,755,256	60,330	0.0127	0.9873	79.78
55.5	4,082,614	15,178	0.0037	0.9963	78.77
56.5	3,859,282	83,282	0.0216	0.9784	78.48
57.5	3,229,251	21,704	0.0067	0.9933	76.78
58.5	3,011,204	7,735	0.0026	0.9974	76.27
59.5	2,861,008	35,215	0.0123	0.9877	76.07
60.5	2,820,504	46,052	0.0163	0.9837	75.13
61.5	2,648,009	13,845	0.0052	0.9948	73.91
62.5	2,608,541	21,883	0.0084	0.9916	73.52
63.5	2,568,509	69,998	0.0273	0.9727	72.90
64.5	2,725,995	43,459	0.0159	0.9841	70.92
65.5	2,584,174	14,056	0.0054	0.9946	69.79
66.5	2,111,325	73,844	0.0350	0.9650	69.41
67.5	1,799,720	9,922	0.0055	0.9945	66.98
68.5	1,835,697	7,577	0.0041	0.9959	66.61
69.5	1,544,874	43,002	0.0278	0.9722	66.34
70.5	1,333,121	19,974	0.0150	0.9850	64.49
71.5	1,035,143	96,244	0.0930	0.9070	63.52
72.5	938,812	45,448	0.0484	0.9516	57.62
73.5	714,628	68,200	0.0954	0.9046	54.83
74.5	640,552	61,904	0.0966	0.9034	49.59
75.5	448,984	33,771	0.0752	0.9248	44.80
76.5	393,112	22,258	0.0566	0.9434	41.43
77.5	365,727	57,902	0.1583	0.8417	39.09
78.5	290,912	18	0.0001	0.9999	32.90

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

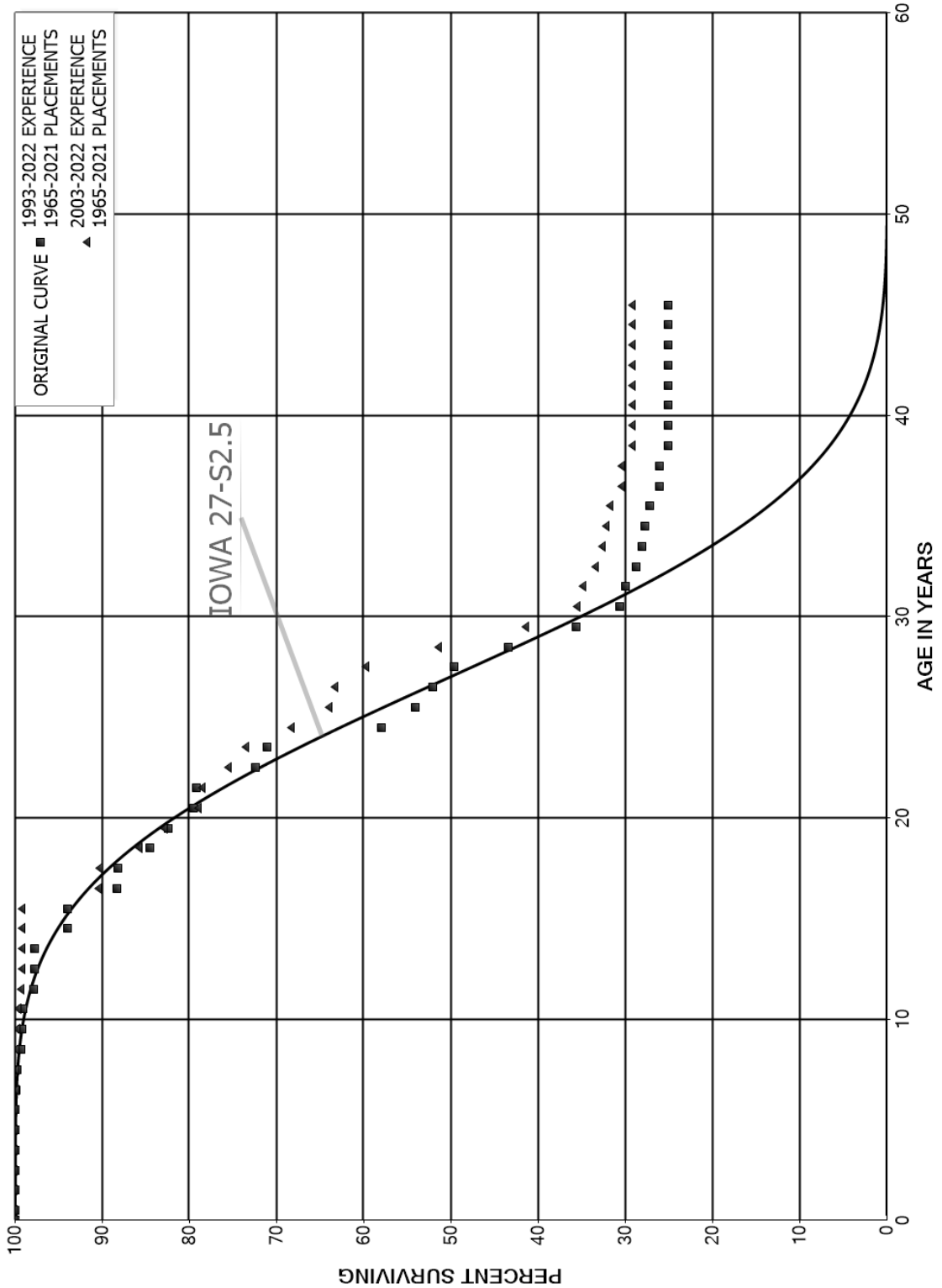
ACCOUNT 367.1 MAINS - EXCLUDING CATHODIC PROTECTION

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1885-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	239,246	1,984	0.0083	0.9917	32.90
80.5	237,166	6,236	0.0263	0.9737	32.62
81.5	485,737	351	0.0007	0.9993	31.77
82.5	535,845	8,393	0.0157	0.9843	31.74
83.5	534,259	4,820	0.0090	0.9910	31.25
84.5	487,230	3,189	0.0065	0.9935	30.96
85.5	481,864	395	0.0008	0.9992	30.76
86.5	463,026	101,811	0.2199	0.7801	30.74
87.5	355,745		0.0000	1.0000	23.98
88.5	156,531	2,088	0.0133	0.9867	23.98
89.5	154,371	2,983	0.0193	0.9807	23.66
90.5	147,716	36	0.0002	0.9998	23.20
91.5	133,456	168	0.0013	0.9987	23.19
92.5	133,274		0.0000	1.0000	23.17
93.5	131,327	10,544	0.0803	0.9197	23.17
94.5	113,907		0.0000	1.0000	21.31
95.5	113,907		0.0000	1.0000	21.31
96.5	113,907	946	0.0083	0.9917	21.31
97.5	112,933	13,799	0.1222	0.8778	21.13
98.5	99,135	7,552	0.0762	0.9238	18.55
99.5	91,567	937	0.0102	0.9898	17.13
100.5	90,614	10,528	0.1162	0.8838	16.96
101.5	80,086	3,420	0.0427	0.9573	14.99
102.5	76,665		0.0000	1.0000	14.35
103.5	51,386		0.0000	1.0000	14.35
104.5	51,381		0.0000	1.0000	14.35
105.5	51,381		0.0000	1.0000	14.35
106.5					14.35

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNTS 367.2 AND 376.2 MAINS - CATHODIC PROTECTION
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNTS 367.2 AND 376.2 MAINS - CATHODIC PROTECTION

ORIGINAL LIFE TABLE

PLACEMENT BAND 1965-2021 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	5,249,354		0.0000	1.0000	100.00
0.5	5,276,101		0.0000	1.0000	100.00
1.5	5,170,869	3,045	0.0006	0.9994	100.00
2.5	4,901,237		0.0000	1.0000	99.94
3.5	4,920,461		0.0000	1.0000	99.94
4.5	4,887,470	1,315	0.0003	0.9997	99.94
5.5	4,793,446	5,309	0.0011	0.9989	99.91
6.5	4,733,704	2,386	0.0005	0.9995	99.80
7.5	4,588,092	22,139	0.0048	0.9952	99.75
8.5	5,283,565	6,994	0.0013	0.9987	99.27
9.5	5,138,813	4,174	0.0008	0.9992	99.14
10.5	5,079,623	62,465	0.0123	0.9877	99.06
11.5	4,677,213	4,942	0.0011	0.9989	97.84
12.5	4,789,506	3,019	0.0006	0.9994	97.74
13.5	4,839,622	183,785	0.0380	0.9620	97.68
14.5	4,866,556	2,116	0.0004	0.9996	93.97
15.5	4,610,193	279,360	0.0606	0.9394	93.93
16.5	4,384,233	5,424	0.0012	0.9988	88.24
17.5	4,264,103	176,277	0.0413	0.9587	88.13
18.5	4,097,296	99,393	0.0243	0.9757	84.48
19.5	3,723,715	134,672	0.0362	0.9638	82.43
20.5	3,667,789	14,773	0.0040	0.9960	79.45
21.5	2,744,604	232,864	0.0848	0.9152	79.13
22.5	2,512,240	48,557	0.0193	0.9807	72.42
23.5	2,286,250	419,279	0.1834	0.8166	71.02
24.5	1,384,392	94,793	0.0685	0.9315	57.99
25.5	1,296,068	46,543	0.0359	0.9641	54.02
26.5	1,225,534	57,315	0.0468	0.9532	52.08
27.5	1,169,979	148,113	0.1266	0.8734	49.65
28.5	1,022,274	183,176	0.1792	0.8208	43.36
29.5	833,699	116,296	0.1395	0.8605	35.59
30.5	715,904	15,029	0.0210	0.9790	30.63
31.5	700,876	29,620	0.0423	0.9577	29.98
32.5	671,256	15,669	0.0233	0.9767	28.72
33.5	634,922	8,427	0.0133	0.9867	28.05
34.5	561,603	9,207	0.0164	0.9836	27.67
35.5	541,846	21,942	0.0405	0.9595	27.22
36.5	508,869	10	0.0000	1.0000	26.12
37.5	339,760	13,234	0.0390	0.9610	26.12
38.5	317,278		0.0000	1.0000	25.10

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNTS 367.2 AND 376.2 MAINS - CATHODIC PROTECTION

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1965-2021 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	235,140		0.0000	1.0000	25.10
40.5	235,140		0.0000	1.0000	25.10
41.5	230,211		0.0000	1.0000	25.10
42.5	207,839		0.0000	1.0000	25.10
43.5	206,639		0.0000	1.0000	25.10
44.5	206,639		0.0000	1.0000	25.10
45.5	192,923		0.0000	1.0000	25.10
46.5	191,273		0.0000	1.0000	25.10
47.5	101,241		0.0000	1.0000	25.10
48.5	84,506		0.0000	1.0000	25.10
49.5	13,176		0.0000	1.0000	25.10
50.5	11,721		0.0000	1.0000	25.10
51.5	11,721		0.0000	1.0000	25.10
52.5	11,721		0.0000	1.0000	25.10
53.5	10,108		0.0000	1.0000	25.10
54.5	1,749		0.0000	1.0000	25.10
55.5	1,749		0.0000	1.0000	25.10
56.5	398		0.0000	1.0000	25.10
57.5					25.10

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNTS 367.2 AND 376.2 MAINS - CATHODIC PROTECTION

ORIGINAL LIFE TABLE

PLACEMENT BAND 1965-2021 EXPERIENCE BAND 2003-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	3,462,909		0.0000	1.0000	100.00
0.5	3,462,118		0.0000	1.0000	100.00
1.5	4,439,533	3,045	0.0007	0.9993	100.00
2.5	4,105,555		0.0000	1.0000	99.93
3.5	4,252,779		0.0000	1.0000	99.93
4.5	4,489,233	1,315	0.0003	0.9997	99.93
5.5	4,251,678	5,309	0.0012	0.9988	99.90
6.5	4,081,224		0.0000	1.0000	99.78
7.5	3,811,351		0.0000	1.0000	99.78
8.5	3,779,701	6,994	0.0019	0.9981	99.78
9.5	3,621,853	4,174	0.0012	0.9988	99.59
10.5	3,278,155	9,772	0.0030	0.9970	99.48
11.5	2,992,785	4,942	0.0017	0.9983	99.18
12.5	2,987,843		0.0000	1.0000	99.02
13.5	3,191,334		0.0000	1.0000	99.02
14.5	3,340,159		0.0000	1.0000	99.02
15.5	3,141,470	275,548	0.0877	0.9123	99.02
16.5	2,903,599	5,424	0.0019	0.9981	90.33
17.5	3,438,791	172,633	0.0502	0.9498	90.16
18.5	2,955,287	99,393	0.0336	0.9664	85.64
19.5	2,822,022	132,173	0.0468	0.9532	82.76
20.5	2,689,850	14,773	0.0055	0.9945	78.88
21.5	1,883,523	73,120	0.0388	0.9612	78.45
22.5	1,866,946	48,557	0.0260	0.9740	75.40
23.5	1,691,682	122,085	0.0722	0.9278	73.44
24.5	1,093,253	69,481	0.0636	0.9364	68.14
25.5	1,032,694	10,000	0.0097	0.9903	63.81
26.5	998,359	57,315	0.0574	0.9426	63.19
27.5	1,063,757	148,113	0.1392	0.8608	59.56
28.5	932,379	181,062	0.1942	0.8058	51.27
29.5	817,249	116,296	0.1423	0.8577	41.31
30.5	701,318	14,328	0.0204	0.9796	35.44
31.5	686,990	27,627	0.0402	0.9598	34.71
32.5	659,363	15,662	0.0238	0.9762	33.32
33.5	624,649	8,272	0.0132	0.9868	32.52
34.5	559,844	9,207	0.0164	0.9836	32.09
35.5	540,087	21,942	0.0406	0.9594	31.57
36.5	508,461		0.0000	1.0000	30.28
37.5	339,760	13,234	0.0390	0.9610	30.28
38.5	317,278		0.0000	1.0000	29.10

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

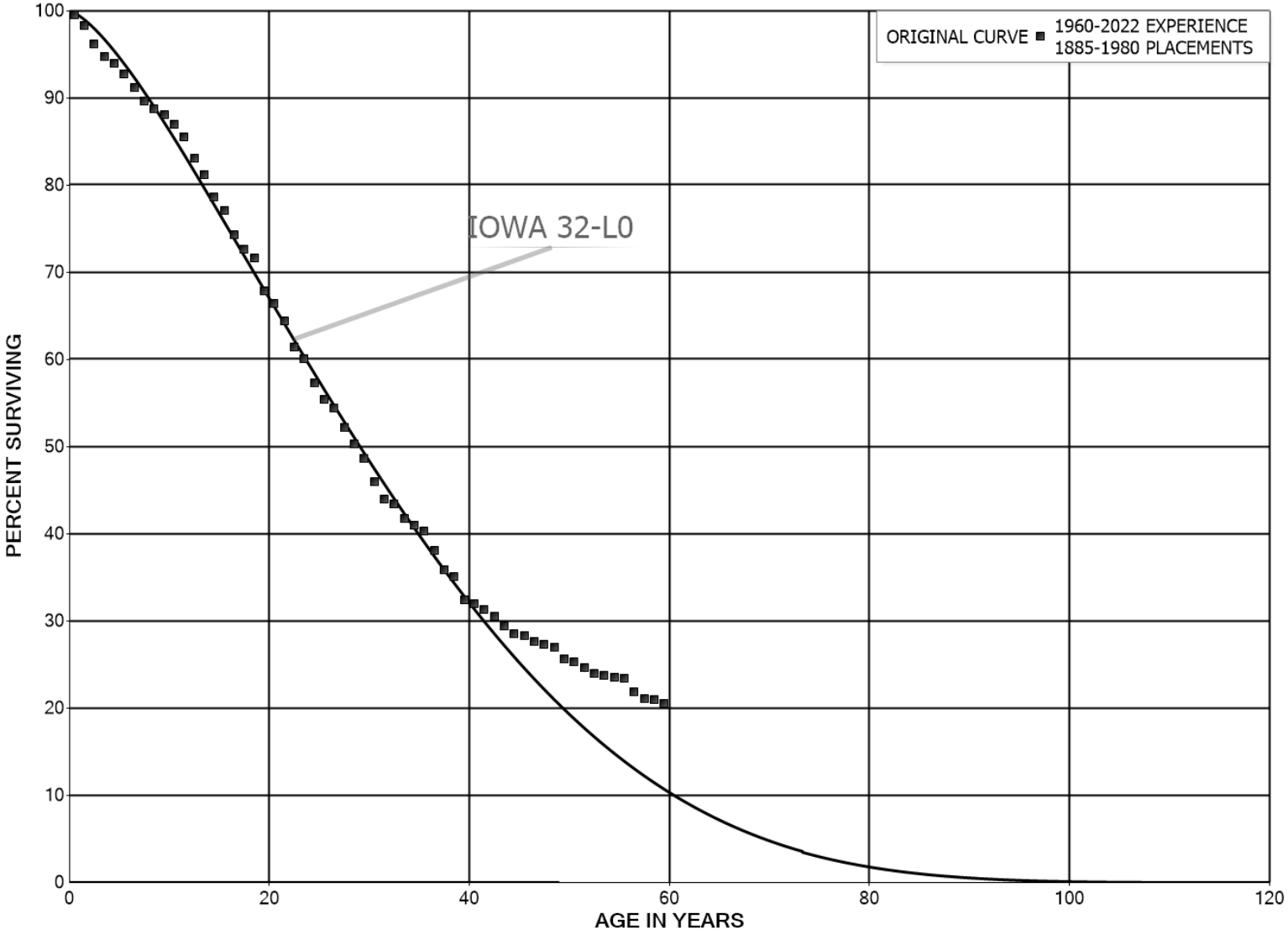
ACCOUNTS 367.2 AND 376.2 MAINS - CATHODIC PROTECTION

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1965-2021 EXPERIENCE BAND 2003-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	235,140		0.0000	1.0000	29.10
40.5	235,140		0.0000	1.0000	29.10
41.5	230,211		0.0000	1.0000	29.10
42.5	207,839		0.0000	1.0000	29.10
43.5	206,639		0.0000	1.0000	29.10
44.5	206,639		0.0000	1.0000	29.10
45.5	192,923		0.0000	1.0000	29.10
46.5	191,273		0.0000	1.0000	29.10
47.5	101,241		0.0000	1.0000	29.10
48.5	84,506		0.0000	1.0000	29.10
49.5	13,176		0.0000	1.0000	29.10
50.5	11,721		0.0000	1.0000	29.10
51.5	11,721		0.0000	1.0000	29.10
52.5	11,721		0.0000	1.0000	29.10
53.5	10,108		0.0000	1.0000	29.10
54.5	1,749		0.0000	1.0000	29.10
55.5	1,749		0.0000	1.0000	29.10
56.5	398		0.0000	1.0000	29.10
57.5					29.10

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 369 MEASURING AND REGULATING STATION EQUIPMENT
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 369 MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1885-1980 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	2,580,976	12,340	0.0048	0.9952	100.00
0.5	2,785,528	34,444	0.0124	0.9876	99.52
1.5	2,521,442	55,151	0.0219	0.9781	98.29
2.5	2,261,587	32,163	0.0142	0.9858	96.14
3.5	2,275,371	19,830	0.0087	0.9913	94.77
4.5	2,269,870	28,815	0.0127	0.9873	93.95
5.5	2,083,386	34,589	0.0166	0.9834	92.76
6.5	2,183,322	39,224	0.0180	0.9820	91.22
7.5	2,106,414	19,020	0.0090	0.9910	89.58
8.5	2,319,211	17,762	0.0077	0.9923	88.77
9.5	2,340,780	30,969	0.0132	0.9868	88.09
10.5	2,154,719	33,802	0.0157	0.9843	86.92
11.5	2,101,571	60,103	0.0286	0.9714	85.56
12.5	1,975,835	46,580	0.0236	0.9764	83.11
13.5	1,914,329	61,115	0.0319	0.9681	81.15
14.5	1,833,701	34,247	0.0187	0.9813	78.56
15.5	1,795,402	64,289	0.0358	0.9642	77.09
16.5	1,705,142	38,569	0.0226	0.9774	74.33
17.5	1,642,846	23,216	0.0141	0.9859	72.65
18.5	1,590,360	85,093	0.0535	0.9465	71.63
19.5	1,427,851	29,325	0.0205	0.9795	67.79
20.5	1,359,110	42,025	0.0309	0.9691	66.40
21.5	1,175,082	54,196	0.0461	0.9539	64.35
22.5	1,082,414	22,254	0.0206	0.9794	61.38
23.5	843,462	39,629	0.0470	0.9530	60.12
24.5	778,111	26,487	0.0340	0.9660	57.29
25.5	720,417	12,621	0.0175	0.9825	55.34
26.5	683,665	28,205	0.0413	0.9587	54.37
27.5	641,085	22,591	0.0352	0.9648	52.13
28.5	624,892	20,968	0.0336	0.9664	50.29
29.5	608,813	33,174	0.0545	0.9455	48.61
30.5	573,064	24,345	0.0425	0.9575	45.96
31.5	555,717	7,827	0.0141	0.9859	44.01
32.5	557,491	20,641	0.0370	0.9630	43.39
33.5	535,669	10,476	0.0196	0.9804	41.78
34.5	525,799	9,334	0.0178	0.9822	40.96
35.5	513,987	27,638	0.0538	0.9462	40.23
36.5	483,628	28,684	0.0593	0.9407	38.07
37.5	453,628	9,572	0.0211	0.9789	35.81
38.5	444,976	33,842	0.0761	0.9239	35.06

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 369 MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1885-1980 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	412,139	5,428	0.0132	0.9868	32.39
40.5	409,053	8,684	0.0212	0.9788	31.96
41.5	402,342	9,592	0.0238	0.9762	31.29
42.5	377,130	14,458	0.0383	0.9617	30.54
43.5	353,397	10,794	0.0305	0.9695	29.37
44.5	314,421	2,393	0.0076	0.9924	28.47
45.5	286,077	6,387	0.0223	0.9777	28.26
46.5	260,438	2,881	0.0111	0.9889	27.62
47.5	250,608	3,821	0.0152	0.9848	27.32
48.5	233,199	11,226	0.0481	0.9519	26.90
49.5	202,169	2,713	0.0134	0.9866	25.61
50.5	194,453	4,941	0.0254	0.9746	25.26
51.5	187,809	5,112	0.0272	0.9728	24.62
52.5	175,603	1,596	0.0091	0.9909	23.95
53.5	164,638	1,653	0.0100	0.9900	23.73
54.5	143,208	667	0.0047	0.9953	23.50
55.5	115,178	7,403	0.0643	0.9357	23.39
56.5	99,853	3,767	0.0377	0.9623	21.88
57.5	63,654	353	0.0056	0.9944	21.06
58.5	61,823	1,266	0.0205	0.9795	20.94
59.5	51,282	841	0.0164	0.9836	20.51
60.5	47,863	56	0.0012	0.9988	20.18
61.5	47,671	897	0.0188	0.9812	20.15
62.5	42,420	581	0.0137	0.9863	19.77
63.5	33,649	62	0.0018	0.9982	19.50
64.5	31,706	50	0.0016	0.9984	19.47
65.5	12,056		0.0000	1.0000	19.44
66.5	8,154	288	0.0354	0.9646	19.44
67.5	6,122	189	0.0309	0.9691	18.75
68.5	4,175	17	0.0040	0.9960	18.17
69.5	4,159	55	0.0131	0.9869	18.10
70.5	3,888	188	0.0483	0.9517	17.86
71.5	2,835		0.0000	1.0000	17.00
72.5	2,497	2	0.0008	0.9992	17.00
73.5	2,378	6	0.0026	0.9974	16.99
74.5	2,423	29	0.0119	0.9881	16.94
75.5	2,240	51	0.0228	0.9772	16.74
76.5	1,342		0.0000	1.0000	16.36
77.5	1,034	20	0.0190	0.9810	16.36
78.5	1,015	71	0.0695	0.9305	16.05

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

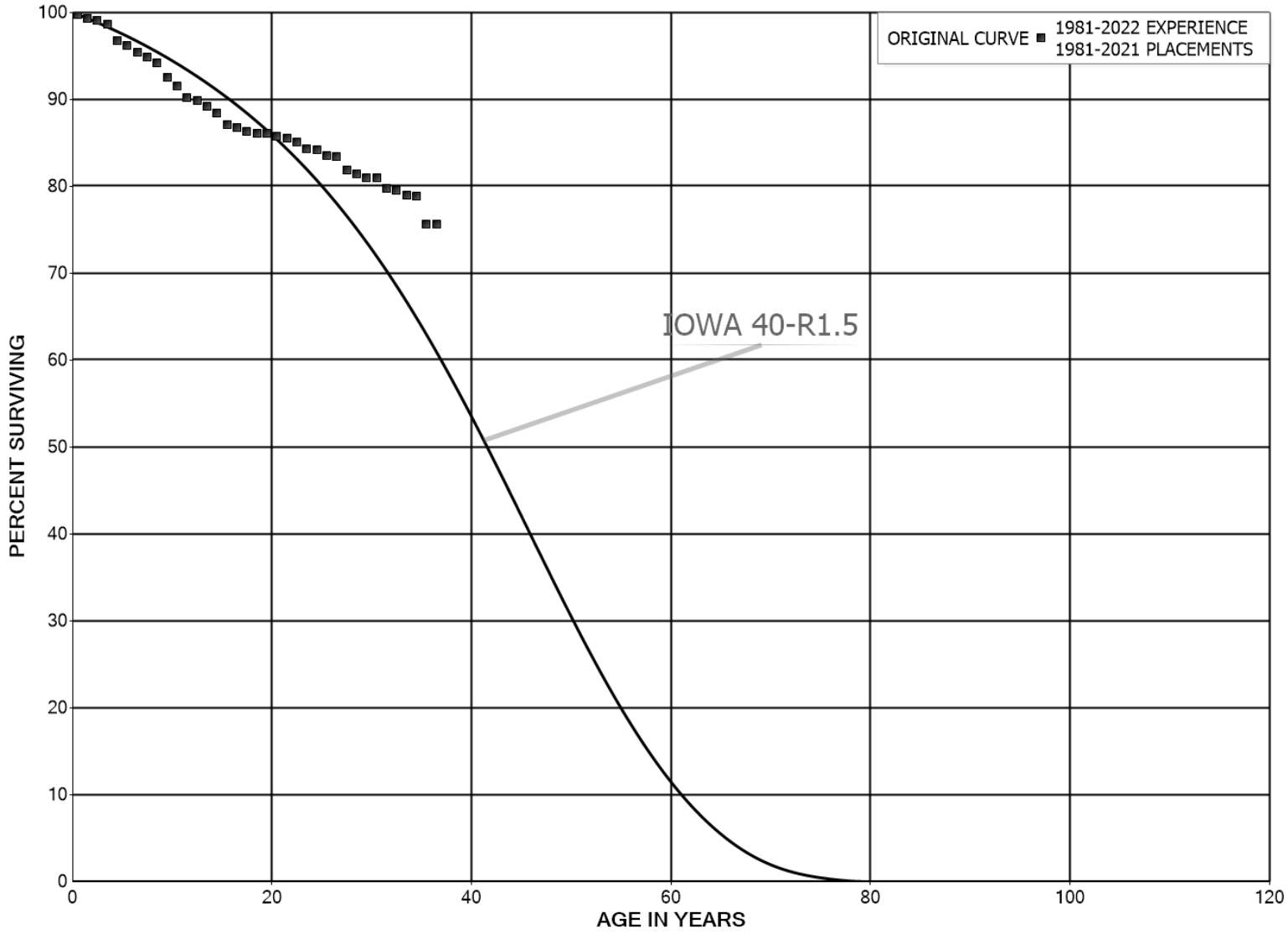
ACCOUNT 369 MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1885-1980 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	887		0.0000	1.0000	14.93
80.5	887		0.0000	1.0000	14.93
81.5	887		0.0000	1.0000	14.93
82.5	887		0.0000	1.0000	14.93
83.5	820		0.0000	1.0000	14.93
84.5	754		0.0000	1.0000	14.93
85.5	442		0.0000	1.0000	14.93
86.5	380		0.0000	1.0000	14.93
87.5	183		0.0000	1.0000	14.93
88.5	153		0.0000	1.0000	14.93
89.5	153		0.0000	1.0000	14.93
90.5	153		0.0000	1.0000	14.93
91.5	153		0.0000	1.0000	14.93
92.5	106		0.0000	1.0000	14.93
93.5	106		0.0000	1.0000	14.93
94.5	93		0.0000	1.0000	14.93
95.5	93		0.0000	1.0000	14.93
96.5	93		0.0000	1.0000	14.93
97.5	93		0.0000	1.0000	14.93
98.5	93		0.0000	1.0000	14.93
99.5	93		0.0000	1.0000	14.93
100.5	39		0.0000	1.0000	14.93
101.5	39		0.0000	1.0000	14.93
102.5	23		0.0000	1.0000	14.93
103.5					14.93

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 369 MEASURING AND REGULATING STATION EQUIPMENT
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 369 MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1981-2021 EXPERIENCE BAND 1981-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	7,612,571	19,026	0.0025	0.9975	100.00
0.5	7,603,577	36,479	0.0048	0.9952	99.75
1.5	7,487,409	13,535	0.0018	0.9982	99.27
2.5	7,001,532	33,682	0.0048	0.9952	99.09
3.5	6,884,380	132,073	0.0192	0.9808	98.62
4.5	6,589,829	39,228	0.0060	0.9940	96.72
5.5	6,518,140	52,587	0.0081	0.9919	96.15
6.5	6,110,244	33,999	0.0056	0.9944	95.37
7.5	5,628,699	40,387	0.0072	0.9928	94.84
8.5	5,545,323	99,974	0.0180	0.9820	94.16
9.5	4,565,008	47,425	0.0104	0.9896	92.46
10.5	4,452,200	63,415	0.0142	0.9858	91.50
11.5	4,254,756	19,277	0.0045	0.9955	90.20
12.5	4,018,926	26,317	0.0065	0.9935	89.79
13.5	3,861,115	36,887	0.0096	0.9904	89.20
14.5	3,764,627	53,983	0.0143	0.9857	88.35
15.5	3,652,358	15,474	0.0042	0.9958	87.08
16.5	3,629,836	18,894	0.0052	0.9948	86.71
17.5	3,597,837	6,736	0.0019	0.9981	86.26
18.5	3,572,487	934	0.0003	0.9997	86.10
19.5	3,556,235	16,489	0.0046	0.9954	86.08
20.5	3,412,868	8,902	0.0026	0.9974	85.68
21.5	3,228,674	14,118	0.0044	0.9956	85.46
22.5	3,207,125	28,463	0.0089	0.9911	85.08
23.5	3,044,431	7,008	0.0023	0.9977	84.33
24.5	2,927,584	23,789	0.0081	0.9919	84.13
25.5	2,753,068	1,802	0.0007	0.9993	83.45
26.5	2,690,035	50,058	0.0186	0.9814	83.40
27.5	2,175,295	11,572	0.0053	0.9947	81.84
28.5	2,043,962	10,321	0.0050	0.9950	81.41
29.5	1,756,649	1,818	0.0010	0.9990	81.00
30.5	1,627,666	24,735	0.0152	0.9848	80.91
31.5	1,499,674	4,101	0.0027	0.9973	79.68
32.5	1,317,700	9,071	0.0069	0.9931	79.47
33.5	1,001,135	756	0.0008	0.9992	78.92
34.5	570,717	23,414	0.0410	0.9590	78.86
35.5	440,807		0.0000	1.0000	75.62
36.5	168,172		0.0000	1.0000	75.62
37.5	126,930		0.0000	1.0000	75.62
38.5	87,266		0.0000	1.0000	75.62

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

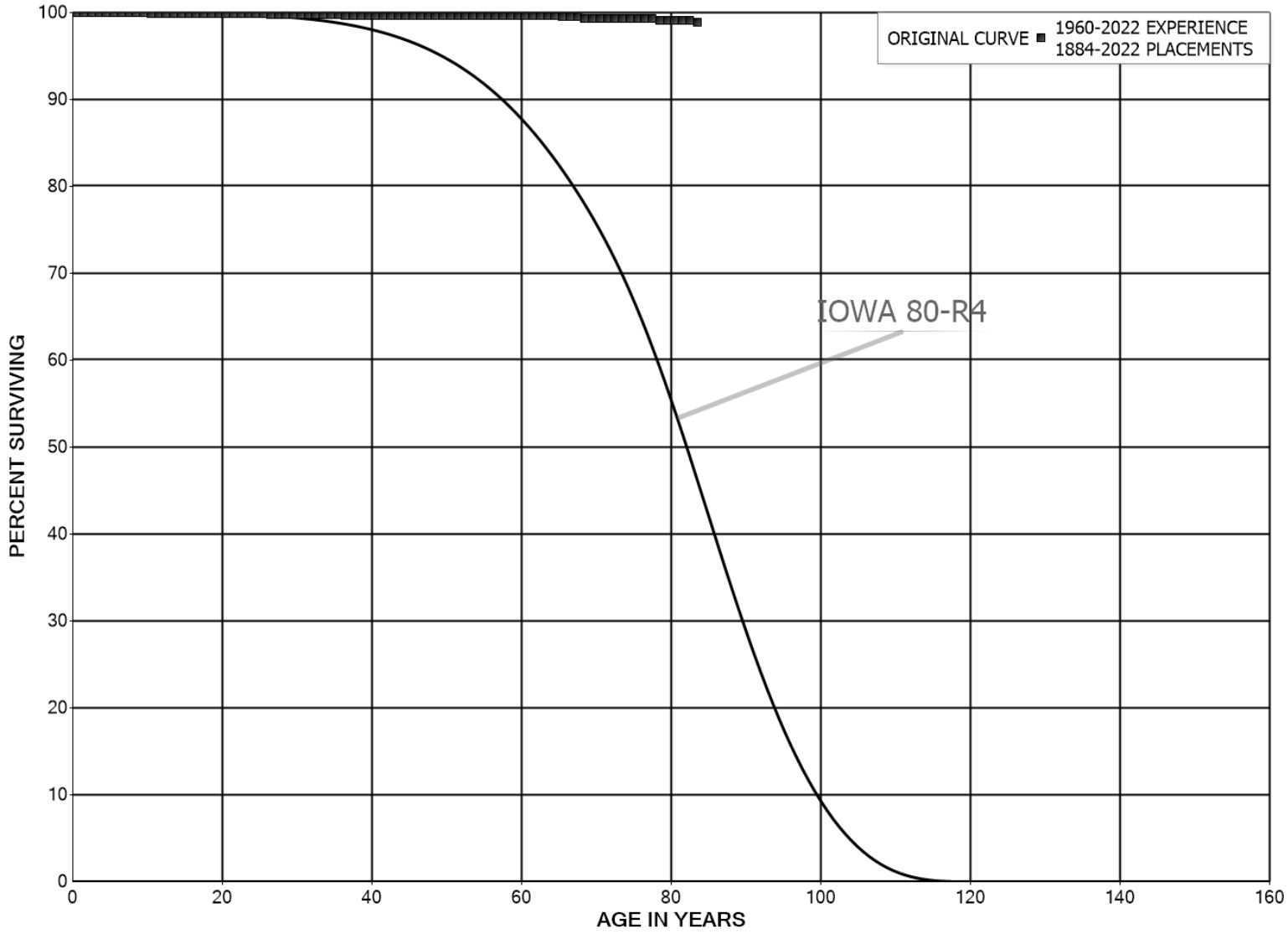
ACCOUNT 369 MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1981-2021 EXPERIENCE BAND 1981-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	38,028		0.0000	1.0000	75.62
40.5	16,635		0.0000	1.0000	75.62
41.5					75.62

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 374.2 RIGHTS OF WAY
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 374.2 RIGHTS OF WAY

ORIGINAL LIFE TABLE

PLACEMENT BAND 1884-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	12,132,497	1,553	0.0001	0.9999	100.00
0.5	11,611,087	6,694	0.0006	0.9994	99.99
1.5	11,038,154	467	0.0000	1.0000	99.93
2.5	10,395,210	146	0.0000	1.0000	99.93
3.5	9,273,124	11	0.0000	1.0000	99.92
4.5	8,773,487	694	0.0001	0.9999	99.92
5.5	8,308,052	606	0.0001	0.9999	99.92
6.5	7,851,843	97	0.0000	1.0000	99.91
7.5	7,383,449	70	0.0000	1.0000	99.91
8.5	6,951,564	1,070	0.0002	0.9998	99.91
9.5	6,621,105	330	0.0000	1.0000	99.89
10.5	6,334,922	1,603	0.0003	0.9997	99.89
11.5	6,026,586	785	0.0001	0.9999	99.86
12.5	5,855,775	606	0.0001	0.9999	99.85
13.5	5,647,301	246	0.0000	1.0000	99.84
14.5	5,385,609	32	0.0000	1.0000	99.83
15.5	5,109,378	97	0.0000	1.0000	99.83
16.5	4,890,395		0.0000	1.0000	99.83
17.5	4,608,582	68	0.0000	1.0000	99.83
18.5	4,315,915		0.0000	1.0000	99.83
19.5	4,104,551	184	0.0000	1.0000	99.83
20.5	3,925,789		0.0000	1.0000	99.82
21.5	3,652,470		0.0000	1.0000	99.82
22.5	3,435,633		0.0000	1.0000	99.82
23.5	3,228,609	12	0.0000	1.0000	99.82
24.5	3,039,053	102	0.0000	1.0000	99.82
25.5	2,786,052	1,247	0.0004	0.9996	99.82
26.5	2,542,857	135	0.0001	0.9999	99.78
27.5	2,342,095	42	0.0000	1.0000	99.77
28.5	2,128,987	80	0.0000	1.0000	99.77
29.5	1,922,426	87	0.0000	1.0000	99.77
30.5	1,770,990	17	0.0000	1.0000	99.76
31.5	1,581,250	367	0.0002	0.9998	99.76
32.5	1,383,363	63	0.0000	1.0000	99.74
33.5	1,243,940	59	0.0000	1.0000	99.73
34.5	1,116,196	87	0.0001	0.9999	99.73
35.5	1,001,247	524	0.0005	0.9995	99.72
36.5	917,401	31	0.0000	1.0000	99.67
37.5	807,967	5	0.0000	1.0000	99.66
38.5	751,912	220	0.0003	0.9997	99.66

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 374.2 RIGHTS OF WAY

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1884-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	692,260		0.0000	1.0000	99.63
40.5	644,322	2	0.0000	1.0000	99.63
41.5	578,192	17	0.0000	1.0000	99.63
42.5	533,570	4	0.0000	1.0000	99.63
43.5	501,056	4	0.0000	1.0000	99.63
44.5	471,106	5	0.0000	1.0000	99.63
45.5	457,229	5	0.0000	1.0000	99.63
46.5	446,478		0.0000	1.0000	99.63
47.5	440,589	10	0.0000	1.0000	99.63
48.5	428,118	9	0.0000	1.0000	99.63
49.5	401,906	15	0.0000	1.0000	99.62
50.5	388,756		0.0000	1.0000	99.62
51.5	348,522	1	0.0000	1.0000	99.62
52.5	327,057	33	0.0001	0.9999	99.62
53.5	312,763	6	0.0000	1.0000	99.61
54.5	283,211	70	0.0002	0.9998	99.61
55.5	262,218		0.0000	1.0000	99.58
56.5	242,638		0.0000	1.0000	99.58
57.5	224,557	37	0.0002	0.9998	99.58
58.5	209,630		0.0000	1.0000	99.57
59.5	195,976	5	0.0000	1.0000	99.57
60.5	176,745		0.0000	1.0000	99.56
61.5	159,794		0.0000	1.0000	99.56
62.5	146,055	6	0.0000	1.0000	99.56
63.5	135,444		0.0000	1.0000	99.56
64.5	120,190	6	0.0000	1.0000	99.56
65.5	105,036		0.0000	1.0000	99.56
66.5	85,293	31	0.0004	0.9996	99.56
67.5	65,932	169	0.0026	0.9974	99.52
68.5	62,565		0.0000	1.0000	99.26
69.5	58,906		0.0000	1.0000	99.26
70.5	56,121		0.0000	1.0000	99.26
71.5	52,535		0.0000	1.0000	99.26
72.5	47,966		0.0000	1.0000	99.26
73.5	43,212		0.0000	1.0000	99.26
74.5	41,691		0.0000	1.0000	99.26
75.5	40,225		0.0000	1.0000	99.26
76.5	39,430		0.0000	1.0000	99.26
77.5	39,031	94	0.0024	0.9976	99.26
78.5	38,494		0.0000	1.0000	99.02

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 374.2 RIGHTS OF WAY

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1884-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	38,153		0.0000	1.0000	99.02
80.5	37,345		0.0000	1.0000	99.02
81.5	35,393		0.0000	1.0000	99.02
82.5	33,322	82	0.0025	0.9975	99.02
83.5	30,907		0.0000	1.0000	98.78
84.5	28,441	13	0.0005	0.9995	98.78
85.5	26,465		0.0000	1.0000	98.74
86.5	24,529		0.0000	1.0000	98.74
87.5	21,721		0.0000	1.0000	98.74
88.5	20,794		0.0000	1.0000	98.74
89.5	19,988		0.0000	1.0000	98.74
90.5	19,379		0.0000	1.0000	98.74
91.5	18,479		0.0000	1.0000	98.74
92.5	17,487		0.0000	1.0000	98.74
93.5	16,404		0.0000	1.0000	98.74
94.5	14,637		0.0000	1.0000	98.74
95.5	13,823		0.0000	1.0000	98.74
96.5	13,015		0.0000	1.0000	98.74
97.5	11,502		0.0000	1.0000	98.74
98.5	10,631		0.0000	1.0000	98.74
99.5	10,087		0.0000	1.0000	98.74
100.5	9,295		0.0000	1.0000	98.74
101.5	8,877		0.0000	1.0000	98.74
102.5	8,398		0.0000	1.0000	98.74
103.5	7,583		0.0000	1.0000	98.74
104.5	6,979		0.0000	1.0000	98.74
105.5	6,875		0.0000	1.0000	98.74
106.5	653		0.0000	1.0000	98.74
107.5	651		0.0000	1.0000	98.74
108.5	651		0.0000	1.0000	98.74
109.5	617		0.0000	1.0000	98.74
110.5	617		0.0000	1.0000	98.74
111.5	617		0.0000	1.0000	98.74
112.5	617		0.0000	1.0000	98.74
113.5	617		0.0000	1.0000	98.74
114.5	582		0.0000	1.0000	98.74
115.5	582		0.0000	1.0000	98.74
116.5	582		0.0000	1.0000	98.74
117.5	582		0.0000	1.0000	98.74
118.5	582		0.0000	1.0000	98.74

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

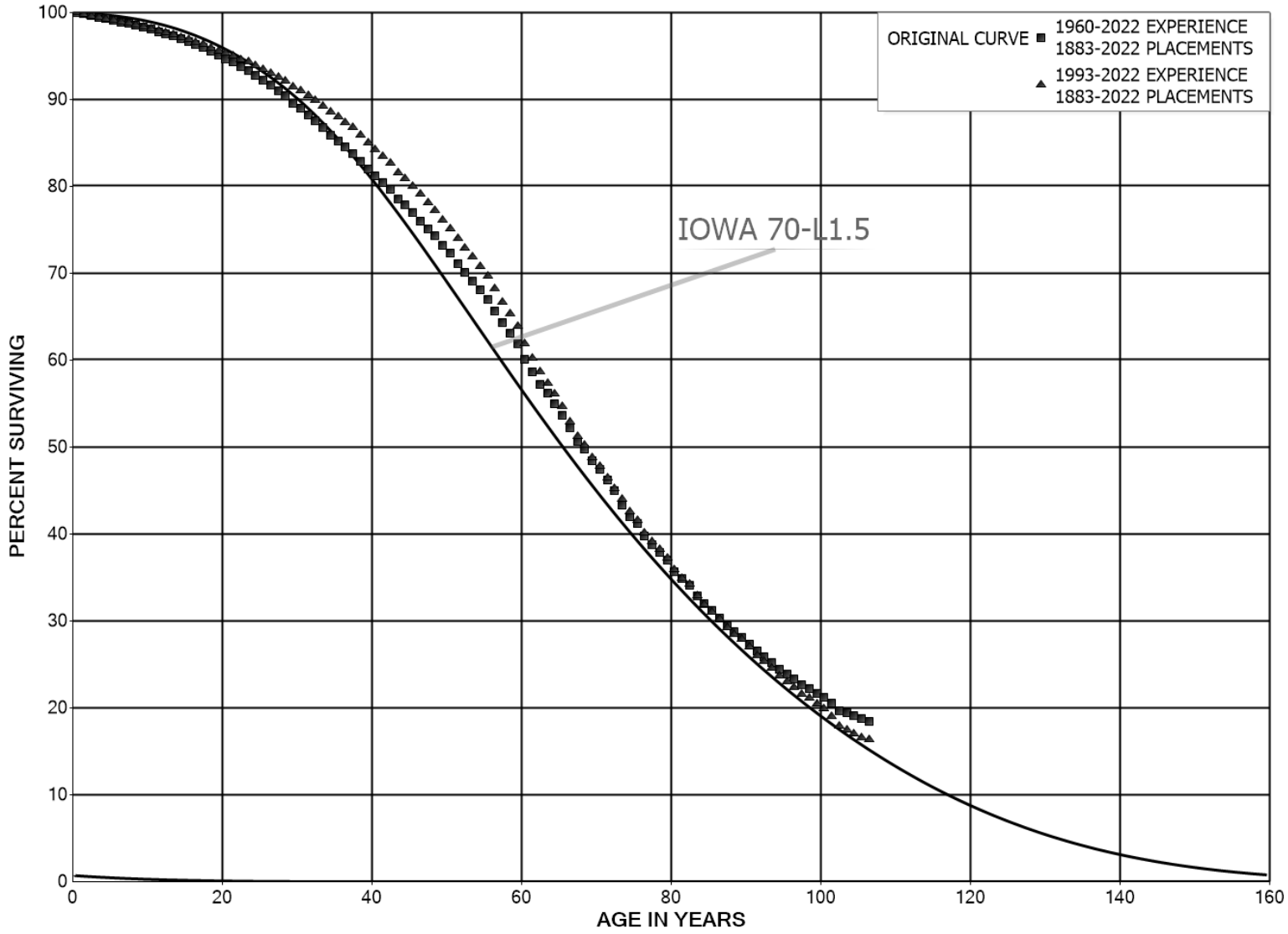
ACCOUNT 374.2 RIGHTS OF WAY

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1884-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
119.5	575		0.0000	1.0000	98.74
120.5	575		0.0000	1.0000	98.74
121.5	575		0.0000	1.0000	98.74
122.5	575		0.0000	1.0000	98.74
123.5	575		0.0000	1.0000	98.74
124.5	575		0.0000	1.0000	98.74
125.5	575		0.0000	1.0000	98.74
126.5	575		0.0000	1.0000	98.74
127.5	575		0.0000	1.0000	98.74
128.5	575		0.0000	1.0000	98.74
129.5	575		0.0000	1.0000	98.74
130.5	575		0.0000	1.0000	98.74
131.5	575		0.0000	1.0000	98.74
132.5	575		0.0000	1.0000	98.74
133.5	425		0.0000	1.0000	98.74
134.5	335		0.0000	1.0000	98.74
135.5	315		0.0000	1.0000	98.74
136.5	163		0.0000	1.0000	98.74
137.5	105		0.0000	1.0000	98.74
138.5					98.74

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION

ORIGINAL LIFE TABLE

PLACEMENT BAND 1883-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	319,741,677	125,559	0.0004	0.9996	100.00
0.5	319,518,527	563,119	0.0018	0.9982	99.96
1.5	310,068,766	565,162	0.0018	0.9982	99.78
2.5	298,244,915	543,671	0.0018	0.9982	99.60
3.5	290,887,485	505,666	0.0017	0.9983	99.42
4.5	283,371,029	545,698	0.0019	0.9981	99.25
5.5	276,342,727	467,716	0.0017	0.9983	99.06
6.5	266,834,729	519,467	0.0019	0.9981	98.89
7.5	258,647,252	561,307	0.0022	0.9978	98.70
8.5	253,182,369	599,853	0.0024	0.9976	98.48
9.5	245,720,928	563,502	0.0023	0.9977	98.25
10.5	240,321,157	606,847	0.0025	0.9975	98.02
11.5	234,095,160	542,679	0.0023	0.9977	97.78
12.5	228,305,203	613,139	0.0027	0.9973	97.55
13.5	221,183,424	859,929	0.0039	0.9961	97.29
14.5	214,544,967	679,585	0.0032	0.9968	96.91
15.5	207,033,333	786,325	0.0038	0.9962	96.60
16.5	201,279,783	673,309	0.0033	0.9967	96.24
17.5	197,745,902	914,038	0.0046	0.9954	95.91
18.5	192,456,709	857,546	0.0045	0.9955	95.47
19.5	186,443,764	775,023	0.0042	0.9958	95.05
20.5	180,612,511	786,860	0.0044	0.9956	94.65
21.5	175,824,773	935,552	0.0053	0.9947	94.24
22.5	169,264,220	764,544	0.0045	0.9955	93.74
23.5	163,138,883	974,761	0.0060	0.9940	93.31
24.5	156,975,265	951,245	0.0061	0.9939	92.76
25.5	148,845,155	909,015	0.0061	0.9939	92.19
26.5	142,199,724	1,094,345	0.0077	0.9923	91.63
27.5	134,508,772	814,073	0.0061	0.9939	90.93
28.5	127,830,654	1,201,950	0.0094	0.9906	90.37
29.5	118,882,476	842,602	0.0071	0.9929	89.53
30.5	111,047,318	848,070	0.0076	0.9924	88.89
31.5	103,181,706	862,459	0.0084	0.9916	88.21
32.5	96,191,501	851,372	0.0089	0.9911	87.47
33.5	89,055,506	840,059	0.0094	0.9906	86.70
34.5	81,105,254	683,905	0.0084	0.9916	85.88
35.5	75,862,935	610,230	0.0080	0.9920	85.16
36.5	69,077,904	607,455	0.0088	0.9912	84.47
37.5	62,760,074	659,557	0.0105	0.9895	83.73
38.5	57,578,812	657,327	0.0114	0.9886	82.85

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1883-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	53,210,445	488,096	0.0092	0.9908	81.90
40.5	50,227,037	467,793	0.0093	0.9907	81.15
41.5	47,178,897	462,965	0.0098	0.9902	80.40
42.5	43,523,736	607,429	0.0140	0.9860	79.61
43.5	40,996,123	360,647	0.0088	0.9912	78.50
44.5	37,440,330	388,966	0.0104	0.9896	77.81
45.5	33,767,888	440,210	0.0130	0.9870	77.00
46.5	31,912,428	379,938	0.0119	0.9881	75.99
47.5	29,959,599	340,521	0.0114	0.9886	75.09
48.5	27,669,144	377,467	0.0136	0.9864	74.24
49.5	25,263,693	337,263	0.0133	0.9867	73.22
50.5	23,293,273	371,470	0.0159	0.9841	72.25
51.5	20,973,476	305,578	0.0146	0.9854	71.09
52.5	19,232,138	279,510	0.0145	0.9855	70.06
53.5	17,485,930	259,320	0.0148	0.9852	69.04
54.5	15,835,713	235,300	0.0149	0.9851	68.02
55.5	14,082,366	281,452	0.0200	0.9800	67.01
56.5	12,541,116	255,184	0.0203	0.9797	65.67
57.5	11,540,791	229,939	0.0199	0.9801	64.33
58.5	10,913,349	210,458	0.0193	0.9807	63.05
59.5	10,352,338	302,738	0.0292	0.9708	61.83
60.5	9,827,665	234,789	0.0239	0.9761	60.02
61.5	9,316,810	216,795	0.0233	0.9767	58.59
62.5	8,841,355	166,905	0.0189	0.9811	57.23
63.5	8,276,434	178,260	0.0215	0.9785	56.15
64.5	7,863,186	181,432	0.0231	0.9769	54.94
65.5	7,178,607	204,549	0.0285	0.9715	53.67
66.5	5,904,157	167,755	0.0284	0.9716	52.14
67.5	4,927,284	88,172	0.0179	0.9821	50.66
68.5	4,613,025	121,673	0.0264	0.9736	49.75
69.5	4,282,416	93,855	0.0219	0.9781	48.44
70.5	3,950,557	104,837	0.0265	0.9735	47.38
71.5	3,544,780	89,494	0.0252	0.9748	46.12
72.5	3,157,430	117,892	0.0373	0.9627	44.96
73.5	2,795,400	87,256	0.0312	0.9688	43.28
74.5	2,595,358	49,175	0.0189	0.9811	41.93
75.5	2,433,926	83,854	0.0345	0.9655	41.13
76.5	2,329,689	55,996	0.0240	0.9760	39.72
77.5	2,282,839	53,231	0.0233	0.9767	38.76
78.5	2,228,728	52,568	0.0236	0.9764	37.86

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
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ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1883-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	2,170,840	76,535	0.0353	0.9647	36.96
80.5	2,142,395	52,754	0.0246	0.9754	35.66
81.5	2,191,401	46,898	0.0214	0.9786	34.78
82.5	2,121,839	72,782	0.0343	0.9657	34.04
83.5	2,052,084	58,316	0.0284	0.9716	32.87
84.5	1,952,626	44,018	0.0225	0.9775	31.94
85.5	1,847,995	54,500	0.0295	0.9705	31.22
86.5	1,749,811	53,742	0.0307	0.9693	30.30
87.5	1,647,589	37,044	0.0225	0.9775	29.37
88.5	1,525,548	33,358	0.0219	0.9781	28.71
89.5	1,483,006	40,893	0.0276	0.9724	28.08
90.5	1,417,196	42,579	0.0300	0.9700	27.30
91.5	1,320,342	35,055	0.0266	0.9734	26.48
92.5	1,177,184	27,274	0.0232	0.9768	25.78
93.5	1,054,623	30,868	0.0293	0.9707	25.18
94.5	973,932	22,501	0.0231	0.9769	24.45
95.5	857,804	20,036	0.0234	0.9766	23.88
96.5	696,199	20,683	0.0297	0.9703	23.32
97.5	598,644	10,992	0.0184	0.9816	22.63
98.5	553,981	14,670	0.0265	0.9735	22.21
99.5	530,246	11,679	0.0220	0.9780	21.63
100.5	503,190	16,433	0.0327	0.9673	21.15
101.5	469,759	18,355	0.0391	0.9609	20.46
102.5	445,139	6,672	0.0150	0.9850	19.66
103.5	418,671	7,650	0.0183	0.9817	19.37
104.5	406,570	6,838	0.0168	0.9832	19.01
105.5	396,776	5,389	0.0136	0.9864	18.69
106.5	263,694	1,098	0.0042	0.9958	18.44
107.5	262,021	2,734	0.0104	0.9896	18.36
108.5	257,497	5,770	0.0224	0.9776	18.17
109.5	249,361	2,187	0.0088	0.9912	17.76
110.5	244,486	4,446	0.0182	0.9818	17.61
111.5	234,822	1,832	0.0078	0.9922	17.29
112.5	232,879	4,102	0.0176	0.9824	17.15
113.5	228,647	949	0.0042	0.9958	16.85
114.5	227,687	2,759	0.0121	0.9879	16.78
115.5	224,928	3,237	0.0144	0.9856	16.58
116.5	221,668	5,047	0.0228	0.9772	16.34
117.5	216,171	3,933	0.0182	0.9818	15.97
118.5	212,182	4,769	0.0225	0.9775	15.68

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
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ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1883-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
119.5	206,699	2,331	0.0113	0.9887	15.32
120.5	203,319	1,944	0.0096	0.9904	15.15
121.5	201,085	5,111	0.0254	0.9746	15.01
122.5	195,974	3,984	0.0203	0.9797	14.62
123.5	138,358	1,153	0.0083	0.9917	14.33
124.5	137,131	14,112	0.1029	0.8971	14.21
125.5	122,860	1,622	0.0132	0.9868	12.75
126.5	128,844	1,794	0.0139	0.9861	12.58
127.5	126,577		0.0000	1.0000	12.40
128.5	126,335	28	0.0002	0.9998	12.40
129.5	125,771	105	0.0008	0.9992	12.40
130.5	124,554	1,005	0.0081	0.9919	12.39
131.5	122,967	5,251	0.0427	0.9573	12.29
132.5	117,687	1,001	0.0085	0.9915	11.76
133.5	116,421	616	0.0053	0.9947	11.66
134.5	77,075	769	0.0100	0.9900	11.60
135.5	28,492		0.0000	1.0000	11.49
136.5	8,223	170	0.0207	0.9793	11.49
137.5	5,568		0.0000	1.0000	11.25
138.5	4,352		0.0000	1.0000	11.25
139.5					11.25

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
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ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION

ORIGINAL LIFE TABLE

PLACEMENT BAND 1883-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	206,067,344	71,608	0.0003	0.9997	100.00
0.5	209,883,768	427,387	0.0020	0.9980	99.97
1.5	206,798,357	423,518	0.0020	0.9980	99.76
2.5	200,440,136	338,696	0.0017	0.9983	99.56
3.5	197,537,399	334,514	0.0017	0.9983	99.39
4.5	195,932,644	378,254	0.0019	0.9981	99.22
5.5	193,914,968	303,834	0.0016	0.9984	99.03
6.5	190,732,733	322,200	0.0017	0.9983	98.87
7.5	189,338,288	392,476	0.0021	0.9979	98.71
8.5	188,473,851	424,187	0.0023	0.9977	98.50
9.5	184,894,276	350,851	0.0019	0.9981	98.28
10.5	182,845,508	412,929	0.0023	0.9977	98.09
11.5	179,321,262	377,413	0.0021	0.9979	97.87
12.5	177,063,761	434,551	0.0025	0.9975	97.67
13.5	173,000,761	608,689	0.0035	0.9965	97.43
14.5	169,994,700	466,316	0.0027	0.9973	97.08
15.5	166,535,609	545,689	0.0033	0.9967	96.82
16.5	162,462,896	392,928	0.0024	0.9976	96.50
17.5	160,395,141	636,613	0.0040	0.9960	96.27
18.5	157,424,219	607,857	0.0039	0.9961	95.89
19.5	153,902,048	410,898	0.0027	0.9973	95.52
20.5	150,194,788	481,379	0.0032	0.9968	95.26
21.5	147,816,913	621,620	0.0042	0.9958	94.95
22.5	143,262,905	451,419	0.0032	0.9968	94.56
23.5	139,014,432	645,429	0.0046	0.9954	94.26
24.5	134,725,944	625,608	0.0046	0.9954	93.82
25.5	128,545,063	585,295	0.0046	0.9954	93.38
26.5	123,620,101	674,949	0.0055	0.9945	92.96
27.5	117,317,478	483,936	0.0041	0.9959	92.45
28.5	111,437,815	835,351	0.0075	0.9925	92.07
29.5	103,187,582	520,327	0.0050	0.9950	91.38
30.5	96,054,968	566,730	0.0059	0.9941	90.92
31.5	88,937,502	567,849	0.0064	0.9936	90.38
32.5	82,765,763	576,320	0.0070	0.9930	89.81
33.5	76,650,928	536,150	0.0070	0.9930	89.18
34.5	69,431,310	476,054	0.0069	0.9931	88.56
35.5	65,312,016	454,339	0.0070	0.9930	87.95
36.5	60,386,324	448,352	0.0074	0.9926	87.34
37.5	55,681,257	557,389	0.0100	0.9900	86.69
38.5	50,993,430	552,845	0.0108	0.9892	85.82

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
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ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1883-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	47,174,574	398,640	0.0085	0.9915	84.89
40.5	44,194,601	383,015	0.0087	0.9913	84.17
41.5	41,560,569	391,159	0.0094	0.9906	83.44
42.5	38,491,022	555,135	0.0144	0.9856	82.66
43.5	36,037,610	303,110	0.0084	0.9916	81.47
44.5	32,807,853	318,375	0.0097	0.9903	80.78
45.5	29,457,295	363,111	0.0123	0.9877	80.00
46.5	27,795,360	329,483	0.0119	0.9881	79.01
47.5	26,239,284	298,257	0.0114	0.9886	78.07
48.5	24,031,130	332,718	0.0138	0.9862	77.19
49.5	21,655,754	290,760	0.0134	0.9866	76.12
50.5	19,751,070	297,482	0.0151	0.9849	75.10
51.5	17,594,690	258,353	0.0147	0.9853	73.97
52.5	15,935,115	237,340	0.0149	0.9851	72.88
53.5	14,314,038	212,144	0.0148	0.9852	71.79
54.5	12,807,129	197,023	0.0154	0.9846	70.73
55.5	11,201,557	240,499	0.0215	0.9785	69.64
56.5	9,776,841	216,230	0.0221	0.9779	68.15
57.5	8,926,447	187,097	0.0210	0.9790	66.64
58.5	8,419,911	175,507	0.0208	0.9792	65.24
59.5	7,961,717	258,774	0.0325	0.9675	63.88
60.5	7,540,855	201,699	0.0267	0.9733	61.81
61.5	7,198,057	189,021	0.0263	0.9737	60.15
62.5	6,968,382	148,500	0.0213	0.9787	58.57
63.5	6,617,209	147,741	0.0223	0.9777	57.33
64.5	6,351,848	167,145	0.0263	0.9737	56.05
65.5	5,863,571	184,717	0.0315	0.9685	54.57
66.5	4,889,110	156,343	0.0320	0.9680	52.85
67.5	4,070,452	74,686	0.0183	0.9817	51.16
68.5	3,744,774	110,678	0.0296	0.9704	50.22
69.5	3,452,121	74,901	0.0217	0.9783	48.74
70.5	3,180,222	82,148	0.0258	0.9742	47.68
71.5	2,821,728	76,539	0.0271	0.9729	46.45
72.5	2,456,884	68,340	0.0278	0.9722	45.19
73.5	2,185,168	73,124	0.0335	0.9665	43.93
74.5	2,007,979	43,154	0.0215	0.9785	42.46
75.5	1,849,330	64,245	0.0347	0.9653	41.55
76.5	2,121,448	53,548	0.0252	0.9748	40.11
77.5	2,076,923	51,456	0.0248	0.9752	39.09
78.5	2,026,265	49,215	0.0243	0.9757	38.13

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
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ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1883-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	1,979,352	75,099	0.0379	0.9621	37.20
80.5	1,901,214	49,661	0.0261	0.9739	35.79
81.5	1,818,607	37,991	0.0209	0.9791	34.85
82.5	1,753,146	63,744	0.0364	0.9636	34.13
83.5	1,651,861	54,467	0.0330	0.9670	32.88
84.5	1,540,994	38,282	0.0248	0.9752	31.80
85.5	1,444,519	38,038	0.0263	0.9737	31.01
86.5	1,361,707	44,780	0.0329	0.9671	30.19
87.5	1,272,544	33,872	0.0266	0.9734	29.20
88.5	1,214,083	25,662	0.0211	0.9789	28.42
89.5	1,187,478	38,544	0.0325	0.9675	27.82
90.5	1,126,203	38,384	0.0341	0.9659	26.92
91.5	1,033,899	30,089	0.0291	0.9709	26.00
92.5	903,147	26,608	0.0295	0.9705	25.25
93.5	866,620	30,205	0.0349	0.9651	24.50
94.5	786,819	21,887	0.0278	0.9722	23.65
95.5	671,662	19,164	0.0285	0.9715	22.99
96.5	511,196	18,878	0.0369	0.9631	22.33
97.5	416,105	8,532	0.0205	0.9795	21.51
98.5	374,199	11,165	0.0298	0.9702	21.07
99.5	354,677	10,361	0.0292	0.9708	20.44
100.5	330,376	15,134	0.0458	0.9542	19.84
101.5	299,209	17,724	0.0592	0.9408	18.93
102.5	278,340	6,441	0.0231	0.9769	17.81
103.5	252,417	7,130	0.0282	0.9718	17.40
104.5	282,474	6,692	0.0237	0.9763	16.91
105.5	330,135	5,389	0.0163	0.9837	16.51
106.5	242,966	1,098	0.0045	0.9955	16.24
107.5	246,121	2,734	0.0111	0.9889	16.16
108.5	242,813	5,770	0.0238	0.9762	15.99
109.5	249,361	2,187	0.0088	0.9912	15.61
110.5	244,486	4,446	0.0182	0.9818	15.47
111.5	234,822	1,832	0.0078	0.9922	15.19
112.5	232,879	4,102	0.0176	0.9824	15.07
113.5	228,647	949	0.0042	0.9958	14.80
114.5	227,687	2,759	0.0121	0.9879	14.74
115.5	224,928	3,237	0.0144	0.9856	14.56
116.5	221,668	5,047	0.0228	0.9772	14.35
117.5	216,171	3,933	0.0182	0.9818	14.03
118.5	212,182	4,769	0.0225	0.9775	13.77

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

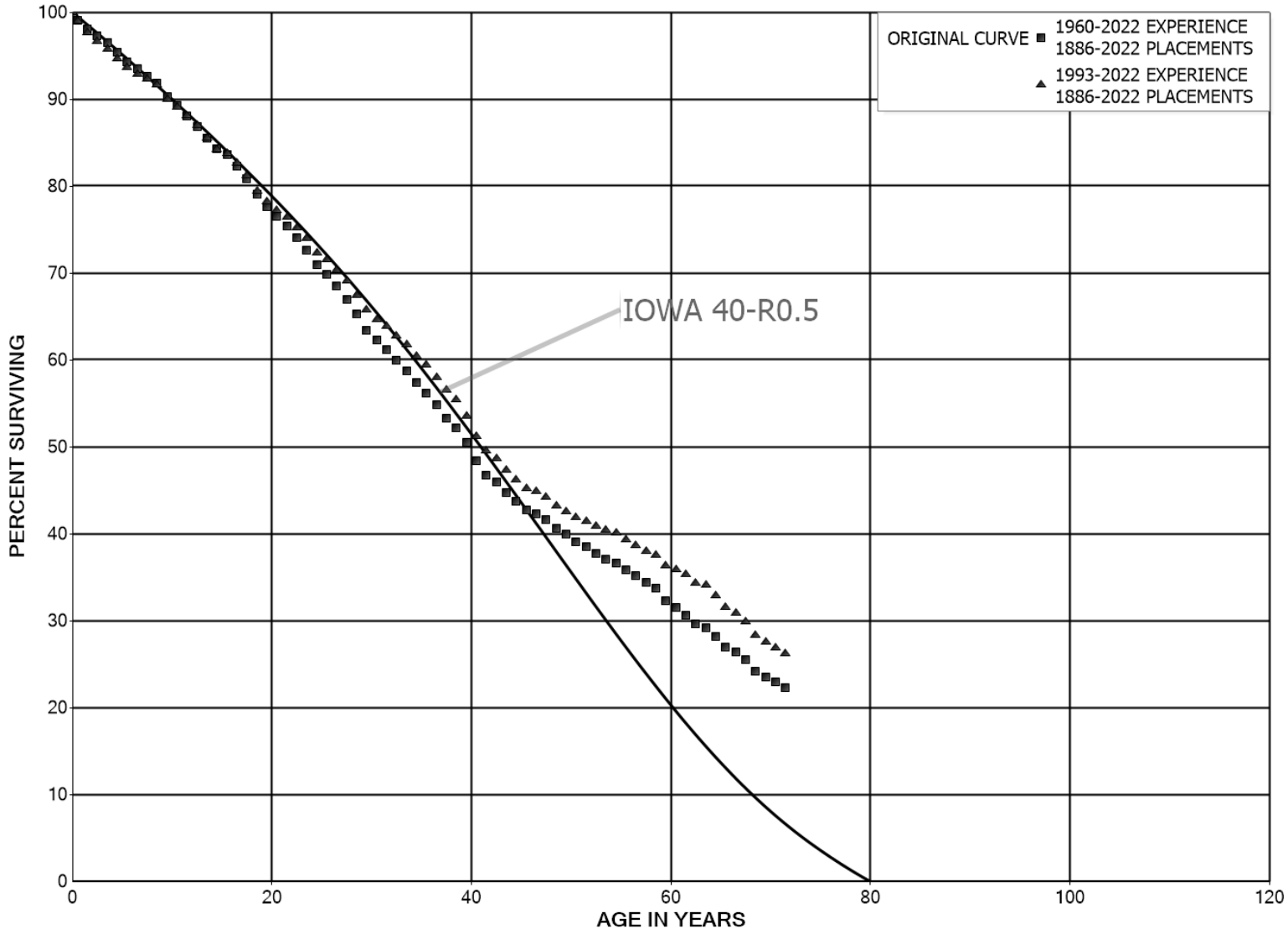
ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1883-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
119.5	206,699	2,331	0.0113	0.9887	13.46
120.5	203,319	1,944	0.0096	0.9904	13.31
121.5	201,085	5,111	0.0254	0.9746	13.18
122.5	195,974	3,984	0.0203	0.9797	12.85
123.5	138,358	1,153	0.0083	0.9917	12.59
124.5	137,131	14,112	0.1029	0.8971	12.48
125.5	122,860	1,622	0.0132	0.9868	11.20
126.5	128,844	1,794	0.0139	0.9861	11.05
127.5	126,577		0.0000	1.0000	10.90
128.5	126,335	28	0.0002	0.9998	10.90
129.5	125,771	105	0.0008	0.9992	10.89
130.5	124,554	1,005	0.0081	0.9919	10.88
131.5	122,967	5,251	0.0427	0.9573	10.80
132.5	117,687	1,001	0.0085	0.9915	10.34
133.5	116,421	616	0.0053	0.9947	10.25
134.5	77,075	769	0.0100	0.9900	10.19
135.5	28,492		0.0000	1.0000	10.09
136.5	8,223	170	0.0207	0.9793	10.09
137.5	5,568		0.0000	1.0000	9.88
138.5	4,352		0.0000	1.0000	9.88
139.5					9.88

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1886-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	12,982,005	126,040	0.0097	0.9903	100.00
0.5	13,027,900	120,516	0.0093	0.9907	99.03
1.5	12,429,009	105,145	0.0085	0.9915	98.11
2.5	11,746,186	93,995	0.0080	0.9920	97.28
3.5	11,227,123	126,652	0.0113	0.9887	96.50
4.5	11,030,324	127,332	0.0115	0.9885	95.42
5.5	10,478,295	93,676	0.0089	0.9911	94.31
6.5	10,041,023	88,279	0.0088	0.9912	93.47
7.5	9,738,915	83,183	0.0085	0.9915	92.65
8.5	9,405,941	158,887	0.0169	0.9831	91.86
9.5	9,035,393	100,633	0.0111	0.9889	90.31
10.5	8,594,165	121,749	0.0142	0.9858	89.30
11.5	8,156,519	106,905	0.0131	0.9869	88.04
12.5	7,880,534	121,762	0.0155	0.9845	86.88
13.5	7,530,954	114,910	0.0153	0.9847	85.54
14.5	7,301,915	54,845	0.0075	0.9925	84.23
15.5	6,911,538	111,177	0.0161	0.9839	83.60
16.5	6,632,052	111,195	0.0168	0.9832	82.26
17.5	6,347,043	139,010	0.0219	0.9781	80.88
18.5	6,123,997	113,486	0.0185	0.9815	79.11
19.5	5,961,588	90,022	0.0151	0.9849	77.64
20.5	5,680,606	77,476	0.0136	0.9864	76.47
21.5	5,542,810	101,509	0.0183	0.9817	75.42
22.5	5,408,099	100,854	0.0186	0.9814	74.04
23.5	5,283,040	124,782	0.0236	0.9764	72.66
24.5	5,122,518	76,970	0.0150	0.9850	70.95
25.5	4,886,967	95,591	0.0196	0.9804	69.88
26.5	4,674,646	105,424	0.0226	0.9774	68.51
27.5	4,351,098	109,710	0.0252	0.9748	66.97
28.5	4,067,083	118,811	0.0292	0.9708	65.28
29.5	3,673,125	65,809	0.0179	0.9821	63.37
30.5	3,379,369	56,901	0.0168	0.9832	62.24
31.5	3,057,074	63,797	0.0209	0.9791	61.19
32.5	2,755,587	54,376	0.0197	0.9803	59.91
33.5	2,485,871	56,933	0.0229	0.9771	58.73
34.5	2,215,549	45,600	0.0206	0.9794	57.39
35.5	1,951,253	47,640	0.0244	0.9756	56.20
36.5	1,706,080	46,439	0.0272	0.9728	54.83
37.5	1,472,782	32,851	0.0223	0.9777	53.34
38.5	1,297,620	41,212	0.0318	0.9682	52.15

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1886-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	1,092,880	45,991	0.0421	0.9579	50.49
40.5	977,066	32,190	0.0329	0.9671	48.37
41.5	879,730	14,787	0.0168	0.9832	46.77
42.5	737,274	20,535	0.0279	0.9721	45.99
43.5	683,227	14,842	0.0217	0.9783	44.71
44.5	632,403	13,911	0.0220	0.9780	43.74
45.5	591,560	6,177	0.0104	0.9896	42.77
46.5	567,860	9,272	0.0163	0.9837	42.33
47.5	544,501	12,797	0.0235	0.9765	41.64
48.5	513,921	8,843	0.0172	0.9828	40.66
49.5	461,326	10,464	0.0227	0.9773	39.96
50.5	433,151	5,521	0.0127	0.9873	39.05
51.5	411,083	8,451	0.0206	0.9794	38.55
52.5	390,070	7,318	0.0188	0.9812	37.76
53.5	368,516	3,916	0.0106	0.9894	37.05
54.5	354,334	8,154	0.0230	0.9770	36.66
55.5	329,416	6,192	0.0188	0.9812	35.82
56.5	308,568	6,700	0.0217	0.9783	35.14
57.5	282,006	5,404	0.0192	0.9808	34.38
58.5	268,133	11,294	0.0421	0.9579	33.72
59.5	247,858	6,036	0.0244	0.9756	32.30
60.5	234,134	6,684	0.0285	0.9715	31.51
61.5	221,121	7,064	0.0319	0.9681	30.61
62.5	207,200	3,037	0.0147	0.9853	29.64
63.5	193,552	7,096	0.0367	0.9633	29.20
64.5	175,351	7,162	0.0408	0.9592	28.13
65.5	158,118	3,405	0.0215	0.9785	26.98
66.5	124,134	3,963	0.0319	0.9681	26.40
67.5	102,505	5,629	0.0549	0.9451	25.56
68.5	91,693	2,432	0.0265	0.9735	24.15
69.5	79,588	2,058	0.0259	0.9741	23.51
70.5	66,977	1,682	0.0251	0.9749	22.91
71.5	56,728	1,129	0.0199	0.9801	22.33
72.5	52,655	894	0.0170	0.9830	21.89
73.5	49,308	1,449	0.0294	0.9706	21.51
74.5	41,626	1,769	0.0425	0.9575	20.88
75.5	34,504	667	0.0193	0.9807	19.99
76.5	31,054	929	0.0299	0.9701	19.61
77.5	29,929	1,269	0.0424	0.9576	19.02
78.5	28,397	209	0.0074	0.9926	18.22

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1886-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	27,955	1,678	0.0600	0.9400	18.08
80.5	24,960	137	0.0055	0.9945	17.00
81.5	24,267	29	0.0012	0.9988	16.90
82.5	24,009	652	0.0272	0.9728	16.88
83.5	21,728	788	0.0363	0.9637	16.42
84.5	19,099	1,111	0.0582	0.9418	15.83
85.5	17,617	204	0.0116	0.9884	14.91
86.5	15,812	199	0.0126	0.9874	14.73
87.5	15,529	330	0.0212	0.9788	14.55
88.5	15,159	742	0.0489	0.9511	14.24
89.5	14,180	331	0.0234	0.9766	13.54
90.5	13,777	319	0.0232	0.9768	13.23
91.5	13,236	812	0.0614	0.9386	12.92
92.5	11,644	435	0.0373	0.9627	12.13
93.5	10,732	545	0.0508	0.9492	11.67
94.5	9,750	368	0.0377	0.9623	11.08
95.5	8,935	201	0.0225	0.9775	10.66
96.5	8,619	1,023	0.1187	0.8813	10.42
97.5	6,920	75	0.0108	0.9892	9.19
98.5	5,169		0.0000	1.0000	9.09
99.5	4,262	313	0.0735	0.9265	9.09
100.5	3,472	140	0.0403	0.9597	8.42
101.5	3,090	141	0.0456	0.9544	8.08
102.5	2,905	537	0.1847	0.8153	7.71
103.5	2,079	56	0.0267	0.9733	6.29
104.5	1,535		0.0000	1.0000	6.12
105.5	1,325	403	0.3044	0.6956	6.12
106.5	337	165	0.4893	0.5107	4.26
107.5	172		0.0000	1.0000	2.17
108.5	78		0.0000	1.0000	2.17
109.5	78		0.0000	1.0000	2.17
110.5	78		0.0000	1.0000	2.17
111.5	42	9	0.2239	0.7761	2.17
112.5	33		0.0000	1.0000	1.69
113.5	33		0.0000	1.0000	1.69
114.5	33		0.0000	1.0000	1.69
115.5	33		0.0000	1.0000	1.69
116.5	33		0.0000	1.0000	1.69
117.5	33		0.0000	1.0000	1.69
118.5	33		0.0000	1.0000	1.69

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1886-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
119.5	33		0.0000	1.0000	1.69
120.5	33		0.0000	1.0000	1.69
121.5	33		0.0000	1.0000	1.69
122.5	33		0.0000	1.0000	1.69
123.5	33		0.0000	1.0000	1.69
124.5	33		0.0000	1.0000	1.69
125.5	33		0.0000	1.0000	1.69
126.5	33		0.0000	1.0000	1.69
127.5	33		0.0000	1.0000	1.69
128.5	33		0.0000	1.0000	1.69
129.5					1.69

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1886-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	7,460,817	76,947	0.0103	0.9897	100.00
0.5	7,703,500	101,810	0.0132	0.9868	98.97
1.5	7,478,764	76,041	0.0102	0.9898	97.66
2.5	7,078,304	68,952	0.0097	0.9903	96.67
3.5	6,780,032	81,275	0.0120	0.9880	95.73
4.5	6,844,180	70,019	0.0102	0.9898	94.58
5.5	6,521,693	52,689	0.0081	0.9919	93.61
6.5	6,514,564	37,656	0.0058	0.9942	92.85
7.5	6,558,628	50,858	0.0078	0.9922	92.32
8.5	6,609,158	120,180	0.0182	0.9818	91.60
9.5	6,653,222	62,683	0.0094	0.9906	89.94
10.5	6,432,486	77,283	0.0120	0.9880	89.09
11.5	6,194,726	78,664	0.0127	0.9873	88.02
12.5	6,203,272	97,655	0.0157	0.9843	86.90
13.5	5,953,924	94,471	0.0159	0.9841	85.53
14.5	5,814,350	33,547	0.0058	0.9942	84.18
15.5	5,494,986	68,326	0.0124	0.9876	83.69
16.5	5,351,412	94,374	0.0176	0.9824	82.65
17.5	5,132,248	110,144	0.0215	0.9785	81.19
18.5	4,975,166	81,236	0.0163	0.9837	79.45
19.5	4,924,227	59,699	0.0121	0.9879	78.15
20.5	4,700,732	48,952	0.0104	0.9896	77.20
21.5	4,623,569	73,797	0.0160	0.9840	76.40
22.5	4,532,933	72,523	0.0160	0.9840	75.18
23.5	4,473,277	101,815	0.0228	0.9772	73.98
24.5	4,356,065	49,811	0.0114	0.9886	72.29
25.5	4,183,309	66,943	0.0160	0.9840	71.47
26.5	4,022,956	72,127	0.0179	0.9821	70.32
27.5	3,763,141	88,118	0.0234	0.9766	69.06
28.5	3,515,842	90,736	0.0258	0.9742	67.45
29.5	3,161,164	50,546	0.0160	0.9840	65.71
30.5	2,905,247	39,068	0.0134	0.9866	64.66
31.5	2,620,207	45,698	0.0174	0.9826	63.79
32.5	2,358,223	35,601	0.0151	0.9849	62.67
33.5	2,119,588	45,473	0.0215	0.9785	61.73
34.5	1,872,576	32,375	0.0173	0.9827	60.40
35.5	1,630,158	38,239	0.0235	0.9765	59.36
36.5	1,435,635	35,919	0.0250	0.9750	57.97
37.5	1,250,639	24,818	0.0198	0.9802	56.52
38.5	1,094,393	36,384	0.0332	0.9668	55.39

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1886-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	905,447	40,900	0.0452	0.9548	53.55
40.5	812,776	26,363	0.0324	0.9676	51.13
41.5	739,636	12,340	0.0167	0.9833	49.48
42.5	605,766	17,258	0.0285	0.9715	48.65
43.5	558,300	12,540	0.0225	0.9775	47.26
44.5	518,886	11,592	0.0223	0.9777	46.20
45.5	488,773	3,181	0.0065	0.9935	45.17
46.5	467,083	6,844	0.0147	0.9853	44.88
47.5	448,981	10,847	0.0242	0.9758	44.22
48.5	422,137	6,136	0.0145	0.9855	43.15
49.5	372,948	6,163	0.0165	0.9835	42.52
50.5	352,252	3,170	0.0090	0.9910	41.82
51.5	334,426	4,916	0.0147	0.9853	41.44
52.5	317,368	3,840	0.0121	0.9879	40.83
53.5	301,526	2,311	0.0077	0.9923	40.34
54.5	292,018	5,743	0.0197	0.9803	40.03
55.5	272,037	4,028	0.0148	0.9852	39.24
56.5	257,122	4,818	0.0187	0.9813	38.66
57.5	234,740	2,732	0.0116	0.9884	37.94
58.5	223,660	7,211	0.0322	0.9678	37.50
59.5	208,519	2,444	0.0117	0.9883	36.29
60.5	198,286	3,437	0.0173	0.9827	35.86
61.5	189,483	5,009	0.0264	0.9736	35.24
62.5	181,271	1,559	0.0086	0.9914	34.31
63.5	169,904	6,093	0.0359	0.9641	34.01
64.5	154,381	6,054	0.0392	0.9608	32.79
65.5	138,450	2,866	0.0207	0.9793	31.51
66.5	105,336	3,535	0.0336	0.9664	30.86
67.5	86,480	4,479	0.0518	0.9482	29.82
68.5	79,707	2,264	0.0284	0.9716	28.28
69.5	69,298	1,591	0.0230	0.9770	27.47
70.5	58,757	1,410	0.0240	0.9760	26.84
71.5	49,397	982	0.0199	0.9801	26.20
72.5	46,635	820	0.0176	0.9824	25.68
73.5	43,429	1,253	0.0289	0.9711	25.23
74.5	36,656	1,705	0.0465	0.9535	24.50
75.5	30,234	542	0.0179	0.9821	23.36
76.5	29,450	784	0.0266	0.9734	22.94
77.5	28,470	1,269	0.0446	0.9554	22.33
78.5	27,068	209	0.0077	0.9923	21.33

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1886-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	26,579	1,631	0.0614	0.9386	21.17
80.5	23,631	137	0.0058	0.9942	19.87
81.5	22,938	29	0.0013	0.9987	19.75
82.5	22,680	652	0.0288	0.9712	19.73
83.5	20,399	788	0.0387	0.9613	19.16
84.5	17,770	1,111	0.0625	0.9375	18.42
85.5	16,227	204	0.0126	0.9874	17.27
86.5	14,422	162	0.0113	0.9887	17.05
87.5	14,236	330	0.0232	0.9768	16.86
88.5	13,867	742	0.0535	0.9465	16.47
89.5	12,888	331	0.0257	0.9743	15.59
90.5	12,485	319	0.0256	0.9744	15.19
91.5	11,943	812	0.0680	0.9320	14.80
92.5	10,352	422	0.0408	0.9592	13.79
93.5	9,452	8	0.0009	0.9991	13.23
94.5	9,007	368	0.0408	0.9592	13.22
95.5	8,191	201	0.0245	0.9755	12.68
96.5	7,876	1,023	0.1299	0.8701	12.37
97.5	6,176	75	0.0122	0.9878	10.76
98.5	4,426		0.0000	1.0000	10.63
99.5	3,551	313	0.0882	0.9118	10.63
100.5	2,761	140	0.0507	0.9493	9.69
101.5	2,544	141	0.0554	0.9446	9.20
102.5	2,359		0.0000	1.0000	8.69
103.5	2,070	56	0.0268	0.9732	8.69
104.5	1,526		0.0000	1.0000	8.46
105.5	1,315	403	0.3066	0.6934	8.46
106.5	337	165	0.4893	0.5107	5.87
107.5	172		0.0000	1.0000	3.00
108.5	78		0.0000	1.0000	3.00
109.5	78		0.0000	1.0000	3.00
110.5	78		0.0000	1.0000	3.00
111.5	42	9	0.2239	0.7761	3.00
112.5	33		0.0000	1.0000	2.32
113.5	33		0.0000	1.0000	2.32
114.5	33		0.0000	1.0000	2.32
115.5	33		0.0000	1.0000	2.32
116.5	33		0.0000	1.0000	2.32
117.5	33		0.0000	1.0000	2.32
118.5	33		0.0000	1.0000	2.32

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

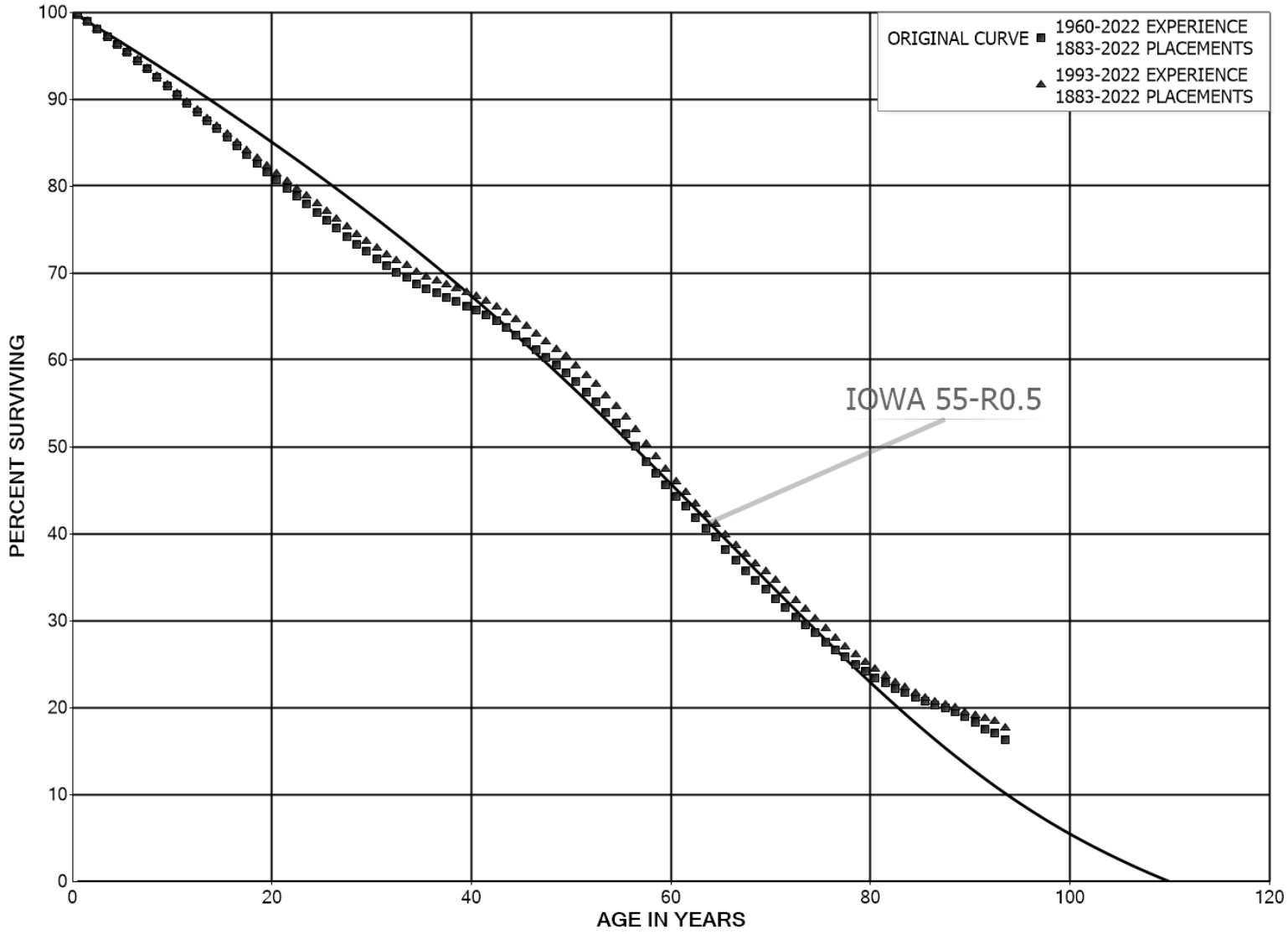
ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1886-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
119.5	33		0.0000	1.0000	2.32
120.5	33		0.0000	1.0000	2.32
121.5	33		0.0000	1.0000	2.32
122.5	33		0.0000	1.0000	2.32
123.5	33		0.0000	1.0000	2.32
124.5	33		0.0000	1.0000	2.32
125.5	33		0.0000	1.0000	2.32
126.5	33		0.0000	1.0000	2.32
127.5	33		0.0000	1.0000	2.32
128.5	33		0.0000	1.0000	2.32
129.5					2.32

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNTS 380, 382 AND 384 SERVICES, METER AND HOUSE REGULATOR INSTALLATIONS
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNTS 380, 382 AND 384 SERVICES, METER AND HOUSE REGULATOR INSTALLATIONS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1883-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	258,820,501	804,058	0.0031	0.9969	100.00
0.5	248,772,897	1,935,514	0.0078	0.9922	99.69
1.5	239,355,299	2,040,570	0.0085	0.9915	98.91
2.5	231,438,847	2,045,210	0.0088	0.9912	98.07
3.5	223,050,891	2,122,647	0.0095	0.9905	97.20
4.5	215,140,479	2,057,790	0.0096	0.9904	96.28
5.5	207,654,535	2,084,825	0.0100	0.9900	95.36
6.5	199,708,889	1,956,934	0.0098	0.9902	94.40
7.5	192,371,961	1,965,414	0.0102	0.9898	93.48
8.5	185,344,271	1,966,146	0.0106	0.9894	92.52
9.5	177,835,257	1,979,079	0.0111	0.9889	91.54
10.5	170,283,616	1,885,803	0.0111	0.9889	90.52
11.5	162,773,297	1,819,583	0.0112	0.9888	89.52
12.5	155,839,213	1,705,354	0.0109	0.9891	88.52
13.5	148,600,801	1,559,387	0.0105	0.9895	87.55
14.5	141,481,109	1,660,304	0.0117	0.9883	86.63
15.5	134,726,613	1,646,474	0.0122	0.9878	85.61
16.5	128,002,922	1,414,038	0.0110	0.9890	84.57
17.5	121,426,738	1,441,163	0.0119	0.9881	83.63
18.5	115,327,212	1,357,477	0.0118	0.9882	82.64
19.5	108,952,155	1,252,209	0.0115	0.9885	81.67
20.5	102,740,464	1,234,524	0.0120	0.9880	80.73
21.5	97,423,772	1,137,264	0.0117	0.9883	79.76
22.5	91,244,940	1,048,558	0.0115	0.9885	78.83
23.5	85,455,653	1,034,858	0.0121	0.9879	77.92
24.5	79,963,155	977,055	0.0122	0.9878	76.98
25.5	73,337,944	876,885	0.0120	0.9880	76.04
26.5	68,087,888	846,639	0.0124	0.9876	75.13
27.5	62,628,329	728,838	0.0116	0.9884	74.19
28.5	57,441,743	661,227	0.0115	0.9885	73.33
29.5	52,531,931	604,938	0.0115	0.9885	72.49
30.5	47,946,765	541,976	0.0113	0.9887	71.65
31.5	43,409,954	443,035	0.0102	0.9898	70.84
32.5	39,361,369	356,038	0.0090	0.9910	70.12
33.5	35,215,582	358,690	0.0102	0.9898	69.48
34.5	31,239,566	274,382	0.0088	0.9912	68.78
35.5	28,183,395	206,284	0.0073	0.9927	68.17
36.5	25,110,925	184,955	0.0074	0.9926	67.67
37.5	23,357,956	162,605	0.0070	0.9930	67.18
38.5	20,668,926	155,332	0.0075	0.9925	66.71

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNTS 380, 382 AND 384 SERVICES, METER AND HOUSE REGULATOR INSTALLATIONS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1883-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	18,422,433	137,174	0.0074	0.9926	66.21
40.5	16,190,301	143,921	0.0089	0.9911	65.71
41.5	13,795,497	141,868	0.0103	0.9897	65.13
42.5	11,422,989	124,742	0.0109	0.9891	64.46
43.5	9,719,167	132,179	0.0136	0.9864	63.76
44.5	8,501,424	111,706	0.0131	0.9869	62.89
45.5	6,748,815	94,538	0.0140	0.9860	62.06
46.5	5,946,749	85,014	0.0143	0.9857	61.19
47.5	5,315,327	80,106	0.0151	0.9849	60.32
48.5	4,336,950	63,516	0.0146	0.9854	59.41
49.5	3,562,558	63,558	0.0178	0.9822	58.54
50.5	2,830,411	57,497	0.0203	0.9797	57.49
51.5	2,245,838	43,852	0.0195	0.9805	56.33
52.5	1,825,705	42,321	0.0232	0.9768	55.23
53.5	1,552,872	34,990	0.0225	0.9775	53.95
54.5	1,282,961	30,038	0.0234	0.9766	52.73
55.5	1,026,370	28,576	0.0278	0.9722	51.50
56.5	823,036	29,235	0.0355	0.9645	50.06
57.5	760,814	20,795	0.0273	0.9727	48.28
58.5	708,620	19,682	0.0278	0.9722	46.96
59.5	659,584	19,394	0.0294	0.9706	45.66
60.5	628,456	16,369	0.0260	0.9740	44.32
61.5	589,705	18,495	0.0314	0.9686	43.16
62.5	550,576	15,051	0.0273	0.9727	41.81
63.5	513,567	13,875	0.0270	0.9730	40.67
64.5	484,257	16,829	0.0348	0.9652	39.57
65.5	441,081	13,916	0.0315	0.9685	38.19
66.5	395,118	14,043	0.0355	0.9645	36.99
67.5	358,744	10,823	0.0302	0.9698	35.67
68.5	331,981	9,927	0.0299	0.9701	34.60
69.5	310,291	9,437	0.0304	0.9696	33.56
70.5	286,542	9,266	0.0323	0.9677	32.54
71.5	272,936	9,022	0.0331	0.9669	31.49
72.5	255,906	7,694	0.0301	0.9699	30.45
73.5	244,373	7,808	0.0320	0.9680	29.53
74.5	227,982	8,387	0.0368	0.9632	28.59
75.5	213,858	7,186	0.0336	0.9664	27.54
76.5	203,236	6,284	0.0309	0.9691	26.61
77.5	195,443	6,553	0.0335	0.9665	25.79
78.5	187,291	5,775	0.0308	0.9692	24.93

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNTS 380, 382 AND 384 SERVICES, METER AND HOUSE REGULATOR INSTALLATIONS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1883-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	181,457	5,597	0.0308	0.9692	24.16
80.5	174,124	4,593	0.0264	0.9736	23.41
81.5	165,892	4,229	0.0255	0.9745	22.79
82.5	157,467	3,575	0.0227	0.9773	22.21
83.5	150,655	3,864	0.0256	0.9744	21.71
84.5	143,074	3,123	0.0218	0.9782	21.15
85.5	137,208	2,606	0.0190	0.9810	20.69
86.5	125,269	2,445	0.0195	0.9805	20.30
87.5	120,050	2,088	0.0174	0.9826	19.90
88.5	114,635	3,770	0.0329	0.9671	19.55
89.5	109,568	3,829	0.0349	0.9651	18.91
90.5	104,434	4,517	0.0433	0.9567	18.25
91.5	97,084	2,304	0.0237	0.9763	17.46
92.5	91,444	4,045	0.0442	0.9558	17.05
93.5	82,448	1,803	0.0219	0.9781	16.29
94.5	77,112	1,406	0.0182	0.9818	15.94
95.5	72,756	1,175	0.0161	0.9839	15.65
96.5	69,017	1,177	0.0170	0.9830	15.39
97.5	62,227	670	0.0108	0.9892	15.13
98.5	57,963	380	0.0065	0.9935	14.97
99.5	54,780	314	0.0057	0.9943	14.87
100.5	50,666	250	0.0049	0.9951	14.78
101.5	47,656	136	0.0029	0.9971	14.71
102.5	46,710	226	0.0048	0.9952	14.67
103.5	45,067	520	0.0115	0.9885	14.60
104.5	38,968	176	0.0045	0.9955	14.43
105.5	38,323	144	0.0038	0.9962	14.37
106.5	26,618	90	0.0034	0.9966	14.31
107.5	25,538	88	0.0034	0.9966	14.26
108.5	24,854	109	0.0044	0.9956	14.21
109.5	24,170	121	0.0050	0.9950	14.15
110.5	23,522	166	0.0070	0.9930	14.08
111.5	22,668	195	0.0086	0.9914	13.98
112.5	21,092	340	0.0161	0.9839	13.86
113.5	19,203	33	0.0017	0.9983	13.64
114.5	17,225	7	0.0004	0.9996	13.61
115.5	14,979	23	0.0016	0.9984	13.61
116.5	12,812	7	0.0006	0.9994	13.59
117.5	10,617		0.0000	1.0000	13.58
118.5	8,174		0.0000	1.0000	13.58

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNTS 380, 382 AND 384 SERVICES, METER AND HOUSE REGULATOR INSTALLATIONS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1883-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
119.5	4,880		0.0000	1.0000	13.58
120.5	2,940		0.0000	1.0000	13.58
121.5	2,385		0.0000	1.0000	13.58
122.5	2,375		0.0000	1.0000	13.58
123.5	2,281		0.0000	1.0000	13.58
124.5	2,096		0.0000	1.0000	13.58
125.5	1,882		0.0000	1.0000	13.58
126.5	1,740		0.0000	1.0000	13.58
127.5	1,659		0.0000	1.0000	13.58
128.5	1,588		0.0000	1.0000	13.58
129.5	1,570		0.0000	1.0000	13.58
130.5	1,490		0.0000	1.0000	13.58
131.5	1,388		0.0000	1.0000	13.58
132.5	1,340		0.0000	1.0000	13.58
133.5	1,248		0.0000	1.0000	13.58
134.5	1,207		0.0000	1.0000	13.58
135.5	970		0.0000	1.0000	13.58
136.5	144		0.0000	1.0000	13.58
137.5	144		0.0000	1.0000	13.58
138.5					13.58

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNTS 380, 382 AND 384 SERVICES, METER AND HOUSE REGULATOR INSTALLATIONS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1883-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	180,053,087	585,267	0.0033	0.9967	100.00
0.5	179,531,356	1,303,069	0.0073	0.9927	99.67
1.5	176,679,748	1,518,134	0.0086	0.9914	98.95
2.5	174,699,996	1,558,609	0.0089	0.9911	98.10
3.5	171,978,866	1,619,843	0.0094	0.9906	97.23
4.5	169,349,965	1,592,002	0.0094	0.9906	96.31
5.5	166,278,977	1,635,433	0.0098	0.9902	95.40
6.5	162,770,434	1,566,997	0.0096	0.9904	94.47
7.5	159,626,793	1,635,834	0.0102	0.9898	93.56
8.5	155,836,928	1,627,668	0.0104	0.9896	92.60
9.5	150,967,428	1,649,565	0.0109	0.9891	91.63
10.5	146,204,433	1,577,979	0.0108	0.9892	90.63
11.5	141,532,428	1,542,863	0.0109	0.9891	89.65
12.5	137,379,774	1,454,010	0.0106	0.9894	88.67
13.5	132,211,240	1,309,404	0.0099	0.9901	87.74
14.5	127,177,604	1,400,159	0.0110	0.9890	86.87
15.5	122,970,308	1,412,523	0.0115	0.9885	85.91
16.5	117,479,875	1,197,157	0.0102	0.9898	84.92
17.5	112,069,991	1,220,059	0.0109	0.9891	84.06
18.5	107,411,324	1,162,922	0.0108	0.9892	83.14
19.5	102,231,312	1,074,001	0.0105	0.9895	82.24
20.5	97,150,823	1,068,891	0.0110	0.9890	81.38
21.5	92,805,274	986,351	0.0106	0.9894	80.48
22.5	87,394,006	919,581	0.0105	0.9895	79.63
23.5	82,213,443	924,798	0.0112	0.9888	78.79
24.5	77,285,755	885,809	0.0115	0.9885	77.90
25.5	71,177,164	798,891	0.0112	0.9888	77.01
26.5	66,347,086	779,514	0.0117	0.9883	76.15
27.5	61,052,011	663,542	0.0109	0.9891	75.25
28.5	56,006,206	607,264	0.0108	0.9892	74.43
29.5	51,216,642	557,108	0.0109	0.9891	73.63
30.5	46,718,542	493,088	0.0106	0.9894	72.83
31.5	42,258,141	400,181	0.0095	0.9905	72.06
32.5	38,274,209	315,985	0.0083	0.9917	71.38
33.5	34,202,078	326,113	0.0095	0.9905	70.79
34.5	30,270,891	241,175	0.0080	0.9920	70.11
35.5	27,298,321	180,730	0.0066	0.9934	69.55
36.5	24,316,036	157,800	0.0065	0.9935	69.09
37.5	22,640,494	141,369	0.0062	0.9938	68.64
38.5	19,995,935	137,767	0.0069	0.9931	68.22

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNTS 380, 382 AND 384 SERVICES, METER AND HOUSE REGULATOR INSTALLATIONS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1883-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	17,799,517	120,520	0.0068	0.9932	67.75
40.5	15,600,578	126,238	0.0081	0.9919	67.29
41.5	13,221,299	126,091	0.0095	0.9905	66.74
42.5	10,886,036	112,949	0.0104	0.9896	66.11
43.5	9,187,045	117,919	0.0128	0.9872	65.42
44.5	8,005,368	97,684	0.0122	0.9878	64.58
45.5	6,278,984	83,463	0.0133	0.9867	63.79
46.5	5,498,745	74,446	0.0135	0.9865	62.94
47.5	4,881,343	71,067	0.0146	0.9854	62.09
48.5	3,924,349	54,085	0.0138	0.9862	61.19
49.5	3,161,307	53,465	0.0169	0.9831	60.34
50.5	2,444,087	47,571	0.0195	0.9805	59.32
51.5	1,873,186	33,419	0.0178	0.9822	58.17
52.5	1,476,413	32,757	0.0222	0.9778	57.13
53.5	1,211,019	26,449	0.0218	0.9782	55.86
54.5	957,490	22,202	0.0232	0.9768	54.64
55.5	713,308	19,490	0.0273	0.9727	53.38
56.5	520,868	16,470	0.0316	0.9684	51.92
57.5	475,120	13,760	0.0290	0.9710	50.28
58.5	437,150	12,779	0.0292	0.9708	48.82
59.5	395,044	12,262	0.0310	0.9690	47.39
60.5	363,509	9,403	0.0259	0.9741	45.92
61.5	338,095	9,991	0.0296	0.9704	44.73
62.5	317,144	8,966	0.0283	0.9717	43.41
63.5	299,996	8,261	0.0275	0.9725	42.19
64.5	286,548	8,633	0.0301	0.9699	41.02
65.5	260,618	7,349	0.0282	0.9718	39.79
66.5	229,572	6,254	0.0272	0.9728	38.67
67.5	212,314	5,963	0.0281	0.9719	37.61
68.5	199,227	4,994	0.0251	0.9749	36.56
69.5	188,387	5,580	0.0296	0.9704	35.64
70.5	176,904	5,983	0.0338	0.9662	34.58
71.5	161,825	5,424	0.0335	0.9665	33.41
72.5	148,248	4,482	0.0302	0.9698	32.29
73.5	138,115	4,802	0.0348	0.9652	31.32
74.5	140,455	5,291	0.0377	0.9623	30.23
75.5	131,308	4,985	0.0380	0.9620	29.09
76.5	141,037	4,962	0.0352	0.9648	27.99
77.5	136,472	4,722	0.0346	0.9654	27.00
78.5	131,716	4,310	0.0327	0.9673	26.07

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNTS 380, 382 AND 384 SERVICES, METER AND HOUSE REGULATOR INSTALLATIONS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1883-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	129,025	4,436	0.0344	0.9656	25.21
80.5	123,837	3,914	0.0316	0.9684	24.35
81.5	117,522	3,505	0.0298	0.9702	23.58
82.5	111,897	2,998	0.0268	0.9732	22.87
83.5	107,446	3,156	0.0294	0.9706	22.26
84.5	103,726	2,563	0.0247	0.9753	21.61
85.5	100,931	1,982	0.0196	0.9804	21.07
86.5	99,035	1,776	0.0179	0.9821	20.66
87.5	96,681	1,713	0.0177	0.9823	20.29
88.5	94,089	2,277	0.0242	0.9758	19.93
89.5	93,885	1,671	0.0178	0.9822	19.45
90.5	93,047	1,638	0.0176	0.9824	19.10
91.5	90,156	1,556	0.0173	0.9827	18.77
92.5	86,636	3,837	0.0443	0.9557	18.44
93.5	77,979	1,641	0.0210	0.9790	17.62
94.5	73,002	1,332	0.0182	0.9818	17.25
95.5	68,944	1,146	0.0166	0.9834	16.94
96.5	65,499	1,158	0.0177	0.9823	16.66
97.5	58,818	661	0.0112	0.9888	16.36
98.5	54,750	380	0.0069	0.9931	16.18
99.5	51,591	314	0.0061	0.9939	16.07
100.5	47,557	250	0.0052	0.9948	15.97
101.5	44,662	126	0.0028	0.9972	15.89
102.5	43,781	124	0.0028	0.9972	15.84
103.5	42,551	379	0.0089	0.9911	15.80
104.5	36,638	26	0.0007	0.9993	15.66
105.5	36,401	57	0.0016	0.9984	15.64
106.5	26,389	73	0.0028	0.9972	15.62
107.5	25,346	82	0.0032	0.9968	15.58
108.5	24,854	109	0.0044	0.9956	15.53
109.5	24,170	121	0.0050	0.9950	15.46
110.5	23,522	166	0.0070	0.9930	15.38
111.5	22,668	195	0.0086	0.9914	15.27
112.5	21,092	340	0.0161	0.9839	15.14
113.5	19,203	33	0.0017	0.9983	14.90
114.5	17,225	7	0.0004	0.9996	14.87
115.5	14,979	23	0.0016	0.9984	14.86
116.5	12,812	7	0.0006	0.9994	14.84
117.5	10,617		0.0000	1.0000	14.83
118.5	8,174		0.0000	1.0000	14.83

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

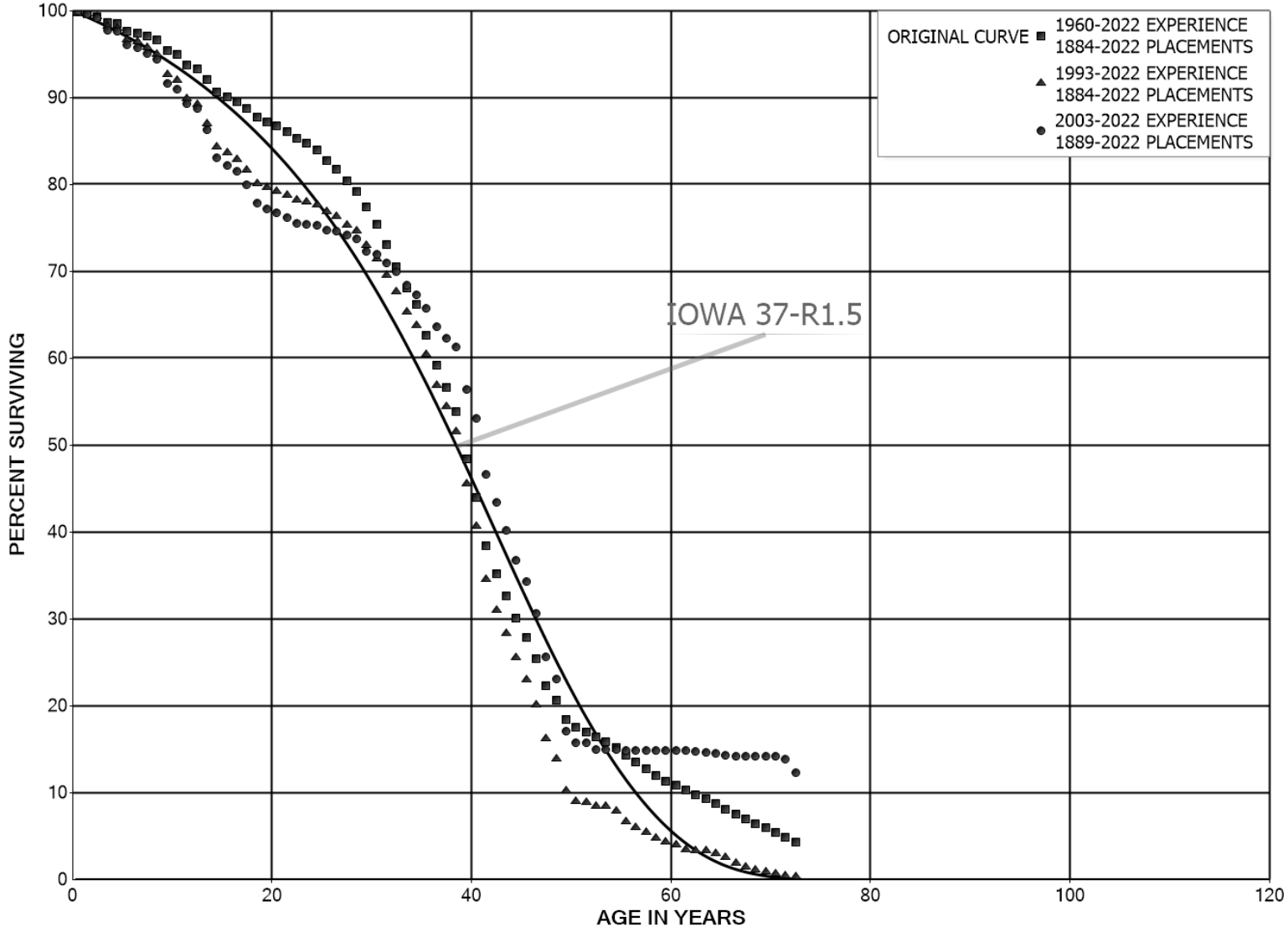
ACCOUNTS 380, 382 AND 384 SERVICES, METER AND HOUSE REGULATOR INSTALLATIONS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1883-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
119.5	4,880		0.0000	1.0000	14.83
120.5	2,940		0.0000	1.0000	14.83
121.5	2,385		0.0000	1.0000	14.83
122.5	2,375		0.0000	1.0000	14.83
123.5	2,281		0.0000	1.0000	14.83
124.5	2,096		0.0000	1.0000	14.83
125.5	1,882		0.0000	1.0000	14.83
126.5	1,740		0.0000	1.0000	14.83
127.5	1,659		0.0000	1.0000	14.83
128.5	1,588		0.0000	1.0000	14.83
129.5	1,570		0.0000	1.0000	14.83
130.5	1,490		0.0000	1.0000	14.83
131.5	1,388		0.0000	1.0000	14.83
132.5	1,340		0.0000	1.0000	14.83
133.5	1,248		0.0000	1.0000	14.83
134.5	1,207		0.0000	1.0000	14.83
135.5	970		0.0000	1.0000	14.83
136.5	144		0.0000	1.0000	14.83
137.5	144		0.0000	1.0000	14.83
138.5					14.83

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 381 METERS
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 381 METERS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1884-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	19,358,615	26,107	0.0013	0.9987	100.00
0.5	18,587,136	46,920	0.0025	0.9975	99.87
1.5	17,559,138	50,152	0.0029	0.9971	99.61
2.5	17,204,957	127,122	0.0074	0.9926	99.33
3.5	17,025,001	20,940	0.0012	0.9988	98.59
4.5	16,529,041	138,920	0.0084	0.9916	98.47
5.5	15,752,455	33,069	0.0021	0.9979	97.65
6.5	15,302,578	58,685	0.0038	0.9962	97.44
7.5	14,216,067	68,939	0.0048	0.9952	97.07
8.5	13,601,153	176,600	0.0130	0.9870	96.60
9.5	13,054,786	57,969	0.0044	0.9956	95.34
10.5	12,767,601	156,809	0.0123	0.9877	94.92
11.5	12,513,595	58,534	0.0047	0.9953	93.75
12.5	12,097,819	166,728	0.0138	0.9862	93.31
13.5	11,382,552	174,297	0.0153	0.9847	92.03
14.5	10,805,904	61,361	0.0057	0.9943	90.62
15.5	10,480,404	67,101	0.0064	0.9936	90.10
16.5	10,252,913	96,823	0.0094	0.9906	89.53
17.5	9,786,173	104,196	0.0106	0.9894	88.68
18.5	9,467,033	55,417	0.0059	0.9941	87.74
19.5	9,393,036	52,831	0.0056	0.9944	87.22
20.5	9,322,017	69,737	0.0075	0.9925	86.73
21.5	9,105,499	79,390	0.0087	0.9913	86.09
22.5	8,908,166	58,998	0.0066	0.9934	85.33
23.5	8,676,625	87,339	0.0101	0.9899	84.77
24.5	8,442,013	115,564	0.0137	0.9863	83.92
25.5	8,130,064	101,715	0.0125	0.9875	82.77
26.5	7,875,797	125,376	0.0159	0.9841	81.73
27.5	7,606,253	114,545	0.0151	0.9849	80.43
28.5	7,404,307	170,422	0.0230	0.9770	79.22
29.5	6,993,182	181,298	0.0259	0.9741	77.40
30.5	6,671,610	206,286	0.0309	0.9691	75.39
31.5	6,351,911	218,027	0.0343	0.9657	73.06
32.5	6,098,221	214,844	0.0352	0.9648	70.55
33.5	5,770,248	164,051	0.0284	0.9716	68.07
34.5	5,446,162	284,969	0.0523	0.9477	66.13
35.5	5,071,739	280,483	0.0553	0.9447	62.67
36.5	4,728,486	204,813	0.0433	0.9567	59.20
37.5	4,408,508	214,440	0.0486	0.9514	56.64
38.5	4,071,724	415,555	0.1021	0.8979	53.88

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 381 METERS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1884-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	3,536,486	321,244	0.0908	0.9092	48.39
40.5	3,223,939	408,226	0.1266	0.8734	43.99
41.5	2,680,743	225,362	0.0841	0.9159	38.42
42.5	2,374,637	175,599	0.0739	0.9261	35.19
43.5	2,126,232	161,868	0.0761	0.9239	32.59
44.5	1,990,584	147,904	0.0743	0.9257	30.11
45.5	1,775,440	158,695	0.0894	0.9106	27.87
46.5	1,592,078	193,757	0.1217	0.8783	25.38
47.5	1,256,659	93,975	0.0748	0.9252	22.29
48.5	1,024,752	111,263	0.1086	0.8914	20.62
49.5	810,686	37,050	0.0457	0.9543	18.38
50.5	781,028	24,129	0.0309	0.9691	17.54
51.5	758,707	26,225	0.0346	0.9654	17.00
52.5	746,536	25,073	0.0336	0.9664	16.41
53.5	740,933	32,389	0.0437	0.9563	15.86
54.5	721,160	43,008	0.0596	0.9404	15.17
55.5	688,278	36,660	0.0533	0.9467	14.26
56.5	669,994	39,032	0.0583	0.9417	13.51
57.5	648,411	40,019	0.0617	0.9383	12.72
58.5	636,871	32,673	0.0513	0.9487	11.93
59.5	616,590	28,296	0.0459	0.9541	11.32
60.5	606,730	28,440	0.0469	0.9531	10.80
61.5	585,059	31,383	0.0536	0.9464	10.30
62.5	562,131	28,743	0.0511	0.9489	9.74
63.5	556,963	33,438	0.0600	0.9400	9.24
64.5	533,725	35,165	0.0659	0.9341	8.69
65.5	517,439	40,415	0.0781	0.9219	8.12
66.5	488,741	34,307	0.0702	0.9298	7.48
67.5	479,274	37,007	0.0772	0.9228	6.96
68.5	439,919	33,859	0.0770	0.9230	6.42
69.5	403,098	37,859	0.0939	0.9061	5.93
70.5	364,541	39,662	0.1088	0.8912	5.37
71.5	322,455	31,675	0.0982	0.9018	4.79
72.5	287,366	23,928	0.0833	0.9167	4.32
73.5	261,563	20,343	0.0778	0.9222	3.96
74.5	239,981	22,676	0.0945	0.9055	3.65
75.5	216,180	24,319	0.1125	0.8875	3.30
76.5	190,600	23,186	0.1216	0.8784	2.93
77.5	164,777	23,221	0.1409	0.8591	2.58
78.5	139,900	23,519	0.1681	0.8319	2.21

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 381 METERS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1884-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	114,920	28,492	0.2479	0.7521	1.84
80.5	85,383	18,257	0.2138	0.7862	1.38
81.5	66,902	11,340	0.1695	0.8305	1.09
82.5	55,469	7,596	0.1369	0.8631	0.90
83.5	47,873	8,012	0.1673	0.8327	0.78
84.5	39,819	5,419	0.1361	0.8639	0.65
85.5	34,400	5,344	0.1554	0.8446	0.56
86.5	29,025	2,788	0.0960	0.9040	0.47
87.5	26,228	2,976	0.1135	0.8865	0.43
88.5	23,252	2,040	0.0877	0.9123	0.38
89.5	21,212	1,854	0.0874	0.9126	0.35
90.5	19,358	2,155	0.1113	0.8887	0.32
91.5	17,174	1,779	0.1036	0.8964	0.28
92.5	15,395	2,328	0.1512	0.8488	0.25
93.5	13,048	1,777	0.1362	0.8638	0.21
94.5	11,271	2,441	0.2165	0.7835	0.18
95.5	8,830	2,210	0.2502	0.7498	0.14
96.5	6,621	1,057	0.1597	0.8403	0.11
97.5	5,563	608	0.1093	0.8907	0.09
98.5	4,916	672	0.1368	0.8632	0.08
99.5	4,225	1,230	0.2912	0.7088	0.07
100.5	2,946	447	0.1518	0.8482	0.05
101.5	2,498	851	0.3407	0.6593	0.04
102.5	1,599	475	0.2972	0.7028	0.03
103.5	1,087	1,029	0.9469	0.0531	0.02
104.5	58		0.0000	1.0000	0.00
105.5	37	25	0.6768	0.3232	0.00
106.5	12		0.0000	1.0000	0.00
107.5	12		0.0000	1.0000	0.00
108.5	12		0.0000	1.0000	0.00
109.5	12		0.0000	1.0000	0.00
110.5	12		0.0000	1.0000	0.00
111.5	12		0.0000	1.0000	0.00
112.5	12		0.0000	1.0000	0.00
113.5	12	12	1.0000		0.00
114.5					

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 381 METERS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1884-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	12,564,274	10,768	0.0009	0.9991	100.00
0.5	11,854,650	30,965	0.0026	0.9974	99.91
1.5	10,827,684	40,697	0.0038	0.9962	99.65
2.5	10,442,114	121,624	0.0116	0.9884	99.28
3.5	10,199,192	13,957	0.0014	0.9986	98.12
4.5	9,786,393	133,949	0.0137	0.9863	97.99
5.5	9,060,939	25,856	0.0029	0.9971	96.65
6.5	8,557,104	53,268	0.0062	0.9938	96.37
7.5	7,572,057	61,943	0.0082	0.9918	95.77
8.5	6,852,420	167,457	0.0244	0.9756	94.99
9.5	6,266,048	46,794	0.0075	0.9925	92.67
10.5	6,037,884	140,471	0.0233	0.9767	91.97
11.5	5,952,108	42,220	0.0071	0.9929	89.83
12.5	5,678,504	144,179	0.0254	0.9746	89.20
13.5	5,139,348	153,462	0.0299	0.9701	86.93
14.5	4,675,478	42,425	0.0091	0.9909	84.34
15.5	4,574,666	42,742	0.0093	0.9907	83.57
16.5	4,496,669	63,417	0.0141	0.9859	82.79
17.5	4,265,869	79,391	0.0186	0.9814	81.62
18.5	4,267,037	27,750	0.0065	0.9935	80.10
19.5	4,514,593	22,442	0.0050	0.9950	79.58
20.5	4,893,562	31,170	0.0064	0.9936	79.19
21.5	4,991,056	33,858	0.0068	0.9932	78.68
22.5	5,061,826	11,976	0.0024	0.9976	78.15
23.5	5,148,128	25,979	0.0050	0.9950	77.96
24.5	5,253,433	50,662	0.0096	0.9904	77.57
25.5	5,256,212	39,614	0.0075	0.9925	76.82
26.5	5,284,472	64,924	0.0123	0.9877	76.24
27.5	5,262,043	50,708	0.0096	0.9904	75.31
28.5	5,279,282	112,714	0.0214	0.9786	74.58
29.5	5,045,205	111,510	0.0221	0.9779	72.99
30.5	4,924,186	129,934	0.0264	0.9736	71.38
31.5	4,765,945	131,075	0.0275	0.9725	69.49
32.5	4,665,961	157,638	0.0338	0.9662	67.58
33.5	4,455,422	104,197	0.0234	0.9766	65.30
34.5	4,252,435	223,246	0.0525	0.9475	63.77
35.5	4,022,730	236,805	0.0589	0.9411	60.42
36.5	3,816,155	165,642	0.0434	0.9566	56.87
37.5	3,600,513	188,635	0.0524	0.9476	54.40
38.5	3,331,139	391,607	0.1176	0.8824	51.55

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 381 METERS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1884-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	2,830,613	300,651	0.1062	0.8938	45.49
40.5	2,548,001	388,919	0.1526	0.8474	40.66
41.5	2,045,657	205,587	0.1005	0.8995	34.45
42.5	1,763,137	155,384	0.0881	0.9119	30.99
43.5	1,500,386	146,620	0.0977	0.9023	28.26
44.5	1,337,990	131,780	0.0985	0.9015	25.50
45.5	1,103,386	142,076	0.1288	0.8712	22.99
46.5	907,931	176,903	0.1948	0.8052	20.03
47.5	569,927	79,575	0.1396	0.8604	16.12
48.5	348,173	93,227	0.2678	0.7322	13.87
49.5	135,430	15,669	0.1157	0.8843	10.16
50.5	116,816	2,153	0.0184	0.9816	8.98
51.5	122,074	5,163	0.0423	0.9577	8.82
52.5	115,115	395	0.0034	0.9966	8.44
53.5	114,838	8,603	0.0749	0.9251	8.42
54.5	105,049	15,264	0.1453	0.8547	7.78
55.5	87,072	9,213	0.1058	0.8942	6.65
56.5	74,919	7,397	0.0987	0.9013	5.95
57.5	61,063	7,200	0.1179	0.8821	5.36
58.5	55,364	5,270	0.0952	0.9048	4.73
59.5	42,830	3,361	0.0785	0.9215	4.28
60.5	31,732	4,300	0.1355	0.8645	3.94
61.5	27,715	906	0.0327	0.9673	3.41
62.5	29,537	506	0.0171	0.9829	3.30
63.5	36,973	2,914	0.0788	0.9212	3.24
64.5	36,242	6,235	0.1720	0.8280	2.99
65.5	37,299	10,047	0.2694	0.7306	2.47
66.5	34,968	6,992	0.2000	0.8000	1.81
67.5	39,415	9,542	0.2421	0.7579	1.45
68.5	34,775	6,556	0.1885	0.8115	1.10
69.5	29,335	9,188	0.3132	0.6868	0.89
70.5	21,594	6,215	0.2878	0.7122	0.61
71.5	18,057	5,542	0.3069	0.6931	0.43
72.5	16,372	2,976	0.1817	0.8183	0.30
73.5	15,935	2,455	0.1540	0.8460	0.25
74.5	20,333	4,358	0.2143	0.7857	0.21
75.5	25,528	5,219	0.2045	0.7955	0.16
76.5	37,203	3,776	0.1015	0.8985	0.13
77.5	43,034	7,915	0.1839	0.8161	0.12
78.5	38,628	8,167	0.2114	0.7886	0.10

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 381 METERS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1884-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	32,365	17,661	0.5457	0.4543	0.08
80.5	15,928	8,834	0.5546	0.4454	0.03
81.5	7,933	3,520	0.4438	0.5562	0.02
82.5	4,928	1,884	0.3824	0.6176	0.01
83.5	3,553	1,216	0.3423	0.6577	0.01
84.5	2,987	954	0.3194	0.6806	0.00
85.5	2,765	333	0.1204	0.8796	0.00
86.5	3,238	510	0.1574	0.8426	0.00
87.5	3,709	664	0.1789	0.8211	0.00
88.5	3,958	768	0.1940	0.8060	0.00
89.5	5,017	618	0.1232	0.8768	0.00
90.5	5,982	1,034	0.1729	0.8271	0.00
91.5	7,014	1,069	0.1524	0.8476	0.00
92.5	7,798	1,881	0.2412	0.7588	0.00
93.5	7,445	1,559	0.2094	0.7906	0.00
94.5	6,376	2,259	0.3543	0.6457	0.00
95.5	4,620	2,170	0.4696	0.5304	0.00
96.5	3,681	1,057	0.2873	0.7127	0.00
97.5	3,071	578	0.1882	0.8118	0.00
98.5	3,300	598	0.1811	0.8189	0.00
99.5	3,159	1,230	0.3895	0.6105	0.00
100.5	2,908	447	0.1538	0.8462	0.00
101.5	2,461	851	0.3459	0.6541	0.00
102.5	1,586	475	0.2996	0.7004	0.00
103.5	1,087	1,029	0.9469	0.0531	0.00
104.5	58		0.0000	1.0000	0.00
105.5	37	25	0.6768	0.3232	0.00
106.5	12		0.0000	1.0000	0.00
107.5	12		0.0000	1.0000	0.00
108.5	12		0.0000	1.0000	0.00
109.5	12		0.0000	1.0000	0.00
110.5	12		0.0000	1.0000	0.00
111.5	12		0.0000	1.0000	0.00
112.5	12		0.0000	1.0000	0.00
113.5	12	12	1.0000		0.00
114.5					

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 381 METERS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1889-2022 EXPERIENCE BAND 2003-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	10,868,167	10,134	0.0009	0.9991	100.00
0.5	9,993,802	29,299	0.0029	0.9971	99.91
1.5	8,963,630	40,401	0.0045	0.9955	99.61
2.5	8,615,321	121,268	0.0141	0.9859	99.16
3.5	8,405,551	11,395	0.0014	0.9986	97.77
4.5	8,021,703	132,631	0.0165	0.9835	97.64
5.5	7,344,693	22,452	0.0031	0.9969	96.02
6.5	6,984,332	44,971	0.0064	0.9936	95.73
7.5	5,989,773	46,797	0.0078	0.9922	95.11
8.5	5,387,624	158,208	0.0294	0.9706	94.37
9.5	5,037,474	34,040	0.0068	0.9932	91.60
10.5	4,903,174	88,481	0.0180	0.9820	90.98
11.5	4,817,690	32,505	0.0067	0.9933	89.34
12.5	4,601,830	126,884	0.0276	0.9724	88.73
13.5	4,015,855	151,945	0.0378	0.9622	86.29
14.5	3,736,278	36,823	0.0099	0.9901	83.02
15.5	3,442,785	30,277	0.0088	0.9912	82.20
16.5	3,279,521	62,146	0.0189	0.9811	81.48
17.5	2,981,119	76,423	0.0256	0.9744	79.94
18.5	2,808,886	25,962	0.0092	0.9908	77.89
19.5	2,830,340	15,281	0.0054	0.9946	77.17
20.5	2,881,004	20,562	0.0071	0.9929	76.75
21.5	2,873,616	25,482	0.0089	0.9911	76.20
22.5	2,850,231	4,625	0.0016	0.9984	75.53
23.5	2,834,488	4,980	0.0018	0.9982	75.41
24.5	2,741,018	20,858	0.0076	0.9924	75.27
25.5	2,701,774	2,500	0.0009	0.9991	74.70
26.5	2,644,821	15,823	0.0060	0.9940	74.63
27.5	2,668,560	16,880	0.0063	0.9937	74.19
28.5	2,845,181	54,361	0.0191	0.9809	73.72
29.5	2,800,091	13,444	0.0048	0.9952	72.31
30.5	2,965,680	39,506	0.0133	0.9867	71.96
31.5	3,031,865	47,248	0.0156	0.9844	71.00
32.5	3,091,157	67,778	0.0219	0.9781	69.90
33.5	3,081,303	47,695	0.0155	0.9845	68.36
34.5	3,062,647	70,670	0.0231	0.9769	67.30
35.5	3,036,337	97,230	0.0320	0.9680	65.75
36.5	2,959,610	64,376	0.0218	0.9782	63.65
37.5	2,847,245	42,486	0.0149	0.9851	62.26
38.5	2,709,772	217,378	0.0802	0.9198	61.33

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 381 METERS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1889-2022 EXPERIENCE BAND 2003-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	2,365,605	138,476	0.0585	0.9415	56.41
40.5	2,236,285	272,043	0.1216	0.8784	53.11
41.5	1,802,032	127,174	0.0706	0.9294	46.65
42.5	1,556,637	115,451	0.0742	0.9258	43.36
43.5	1,294,673	111,031	0.0858	0.9142	40.14
44.5	1,144,383	76,103	0.0665	0.9335	36.70
45.5	953,819	102,221	0.1072	0.8928	34.26
46.5	802,940	130,101	0.1620	0.8380	30.59
47.5	514,646	50,811	0.0987	0.9013	25.63
48.5	323,093	83,703	0.2591	0.7409	23.10
49.5	123,224	10,223	0.0830	0.9170	17.12
50.5	103,313		0.0000	1.0000	15.70
51.5	95,797	4,473	0.0467	0.9533	15.70
52.5	82,150		0.0000	1.0000	14.96
53.5	77,594	256	0.0033	0.9967	14.96
54.5	69,626	162	0.0023	0.9977	14.91
55.5	59,826		0.0000	1.0000	14.88
56.5	52,588		0.0000	1.0000	14.88
57.5	43,336		0.0000	1.0000	14.88
58.5	40,415		0.0000	1.0000	14.88
59.5	32,733		0.0000	1.0000	14.88
60.5	24,475		0.0000	1.0000	14.88
61.5	22,149	245	0.0111	0.9889	14.88
62.5	18,487	102	0.0055	0.9945	14.71
63.5	15,405	169	0.0110	0.9890	14.63
64.5	10,958	102	0.0093	0.9907	14.47
65.5	7,614	99	0.0130	0.9870	14.34
66.5	7,248		0.0000	1.0000	14.15
67.5	6,569		0.0000	1.0000	14.15
68.5	5,837		0.0000	1.0000	14.15
69.5	3,435		0.0000	1.0000	14.15
70.5	2,915	66	0.0227	0.9773	14.15
71.5	2,379	269	0.1132	0.8868	13.83
72.5	615		0.0000	1.0000	12.26
73.5	584	325	0.5565	0.4435	12.26
74.5	770	511	0.6636	0.3364	5.44
75.5	691	432	0.6252	0.3748	1.83
76.5	305	121	0.3969	0.6031	0.69
77.5	255	82	0.3209	0.6791	0.41
78.5	130		0.0000	1.0000	0.28

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

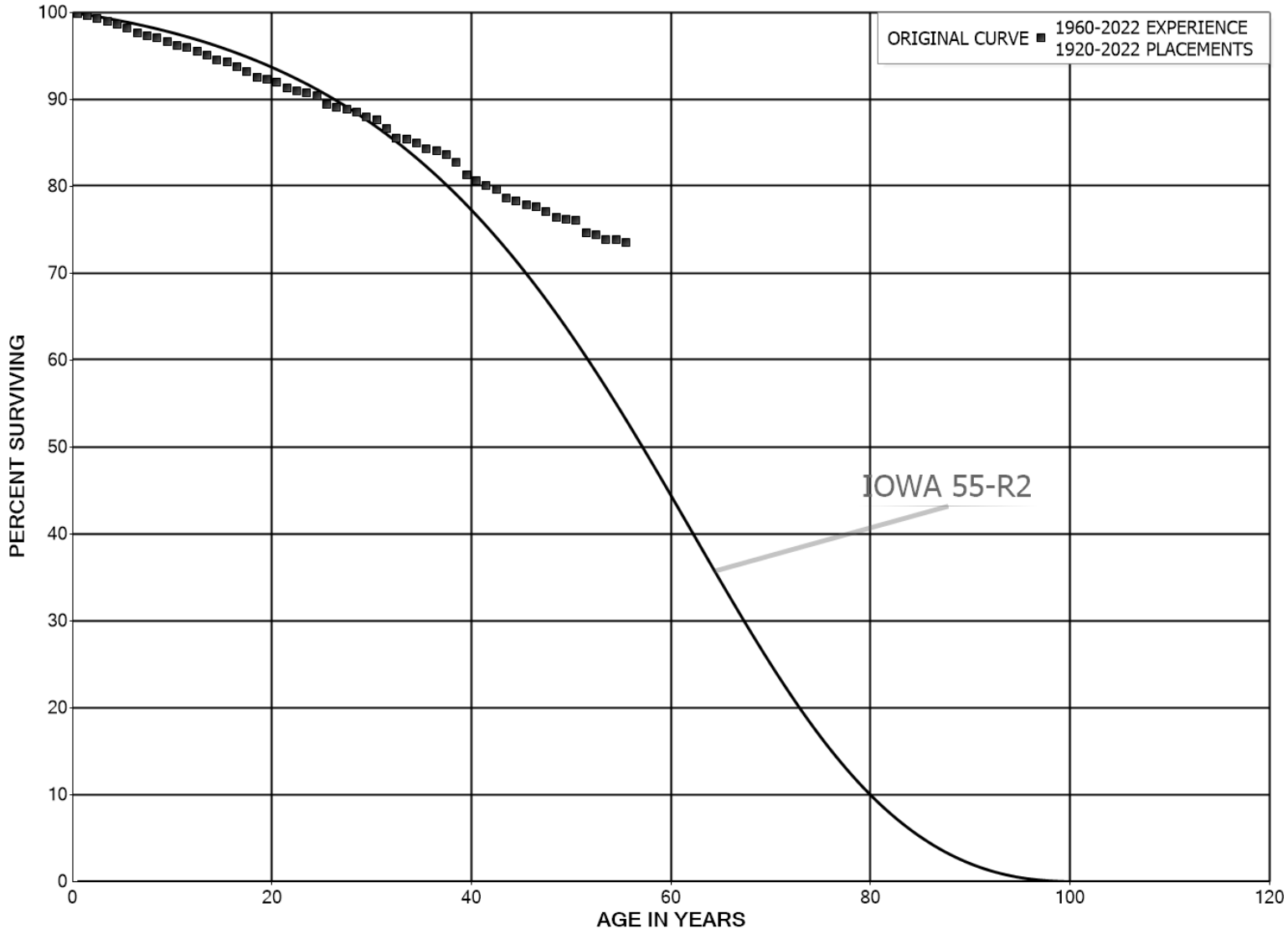
ACCOUNT 381 METERS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1889-2022 EXPERIENCE BAND 2003-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	149		0.0000	1.0000	0.28
80.5	198		0.0000	1.0000	0.28
81.5	198		0.0000	1.0000	0.28
82.5	247		0.0000	1.0000	0.28
83.5	283		0.0000	1.0000	0.28
84.5	240		0.0000	1.0000	0.28
85.5	331		0.0000	1.0000	0.28
86.5	418		0.0000	1.0000	0.28
87.5	418		0.0000	1.0000	0.28
88.5	418		0.0000	1.0000	0.28
89.5	423		0.0000	1.0000	0.28
90.5	423		0.0000	1.0000	0.28
91.5	394		0.0000	1.0000	0.28
92.5	417	23	0.0543	0.9457	0.28
93.5	375		0.0000	1.0000	0.27
94.5	375		0.0000	1.0000	0.27
95.5	375		0.0000	1.0000	0.27
96.5	375		0.0000	1.0000	0.27
97.5	384	79	0.2067	0.7933	0.27
98.5	266	87	0.3274	0.6726	0.21
99.5	160		0.0000	1.0000	0.14
100.5	111		0.0000	1.0000	0.14
101.5	111	6	0.0502	0.9498	0.14
102.5	57		0.0000	1.0000	0.13
103.5	20		0.0000	1.0000	0.13
104.5	20		0.0000	1.0000	0.13
105.5					0.13
106.5					
107.5					
108.5					
109.5					
110.5					
111.5					
112.5					
113.5	12	12	1.0000		
114.5					

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 385 INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 385 INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE

PLACEMENT BAND 1920-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	16,608,357	25,514	0.0015	0.9985	100.00
0.5	16,537,688	40,554	0.0025	0.9975	99.85
1.5	16,227,615	57,500	0.0035	0.9965	99.60
2.5	15,765,353	49,913	0.0032	0.9968	99.25
3.5	14,696,049	55,430	0.0038	0.9962	98.93
4.5	13,923,030	59,929	0.0043	0.9957	98.56
5.5	13,538,756	73,783	0.0054	0.9946	98.14
6.5	13,092,234	41,468	0.0032	0.9968	97.60
7.5	12,640,074	26,118	0.0021	0.9979	97.29
8.5	12,314,908	59,095	0.0048	0.9952	97.09
9.5	11,322,072	49,897	0.0044	0.9956	96.63
10.5	10,820,214	30,244	0.0028	0.9972	96.20
11.5	10,573,958	44,971	0.0043	0.9957	95.93
12.5	10,312,797	53,310	0.0052	0.9948	95.52
13.5	9,982,280	53,012	0.0053	0.9947	95.03
14.5	9,576,672	26,353	0.0028	0.9972	94.52
15.5	9,091,372	55,840	0.0061	0.9939	94.26
16.5	8,792,017	50,136	0.0057	0.9943	93.69
17.5	8,597,325	54,866	0.0064	0.9936	93.15
18.5	8,131,992	25,758	0.0032	0.9968	92.56
19.5	7,895,115	27,120	0.0034	0.9966	92.26
20.5	7,237,848	48,211	0.0067	0.9933	91.95
21.5	6,935,896	30,259	0.0044	0.9956	91.33
22.5	6,634,557	18,944	0.0029	0.9971	90.94
23.5	6,111,812	18,899	0.0031	0.9969	90.68
24.5	5,627,647	65,077	0.0116	0.9884	90.40
25.5	5,044,424	18,986	0.0038	0.9962	89.35
26.5	4,340,870	8,704	0.0020	0.9980	89.01
27.5	3,826,171	15,754	0.0041	0.9959	88.84
28.5	3,419,144	18,354	0.0054	0.9946	88.47
29.5	3,069,520	14,468	0.0047	0.9953	88.00
30.5	2,778,471	31,022	0.0112	0.9888	87.58
31.5	2,447,116	30,363	0.0124	0.9876	86.60
32.5	2,034,595	3,878	0.0019	0.9981	85.53
33.5	1,729,718	7,317	0.0042	0.9958	85.37
34.5	1,470,291	13,270	0.0090	0.9910	85.00
35.5	1,278,989	2,622	0.0021	0.9979	84.24
36.5	1,036,539	5,397	0.0052	0.9948	84.06
37.5	937,804	9,637	0.0103	0.9897	83.63
38.5	854,942	14,896	0.0174	0.9826	82.77

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

ACCOUNT 385 INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1920-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	812,694	7,106	0.0087	0.9913	81.32
40.5	726,717	4,895	0.0067	0.9933	80.61
41.5	670,473	3,620	0.0054	0.9946	80.07
42.5	600,701	7,720	0.0129	0.9871	79.64
43.5	543,583	2,151	0.0040	0.9960	78.61
44.5	497,950	2,964	0.0060	0.9940	78.30
45.5	481,866	1,379	0.0029	0.9971	77.84
46.5	462,807	3,375	0.0073	0.9927	77.62
47.5	439,049	3,516	0.0080	0.9920	77.05
48.5	403,044	1,528	0.0038	0.9962	76.43
49.5	369,796	525	0.0014	0.9986	76.14
50.5	339,793	6,530	0.0192	0.9808	76.03
51.5	284,060	654	0.0023	0.9977	74.57
52.5	228,342	1,696	0.0074	0.9926	74.40
53.5	164,739		0.0000	1.0000	73.85
54.5	121,249	637	0.0053	0.9947	73.85
55.5	85,322	346	0.0041	0.9959	73.46
56.5	49,013	880	0.0180	0.9820	73.16
57.5	46,848	392	0.0084	0.9916	71.85
58.5	43,860	40	0.0009	0.9991	71.25
59.5	38,940	273	0.0070	0.9930	71.18
60.5	37,042	12	0.0003	0.9997	70.68
61.5	35,935	22	0.0006	0.9994	70.66
62.5	32,420	1,192	0.0368	0.9632	70.62
63.5	27,485		0.0000	1.0000	68.02
64.5	22,583	102	0.0045	0.9955	68.02
65.5	21,546	252	0.0117	0.9883	67.71
66.5	21,169		0.0000	1.0000	66.92
67.5	14,094		0.0000	1.0000	66.92
68.5	14,094		0.0000	1.0000	66.92
69.5	7,815	14	0.0018	0.9982	66.92
70.5	7,455		0.0000	1.0000	66.80
71.5	7,193		0.0000	1.0000	66.80
72.5	6,938		0.0000	1.0000	66.80
73.5	6,283		0.0000	1.0000	66.80
74.5	6,199		0.0000	1.0000	66.80
75.5	4,698		0.0000	1.0000	66.80
76.5	4,371		0.0000	1.0000	66.80
77.5	3,844		0.0000	1.0000	66.80
78.5	3,844		0.0000	1.0000	66.80

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

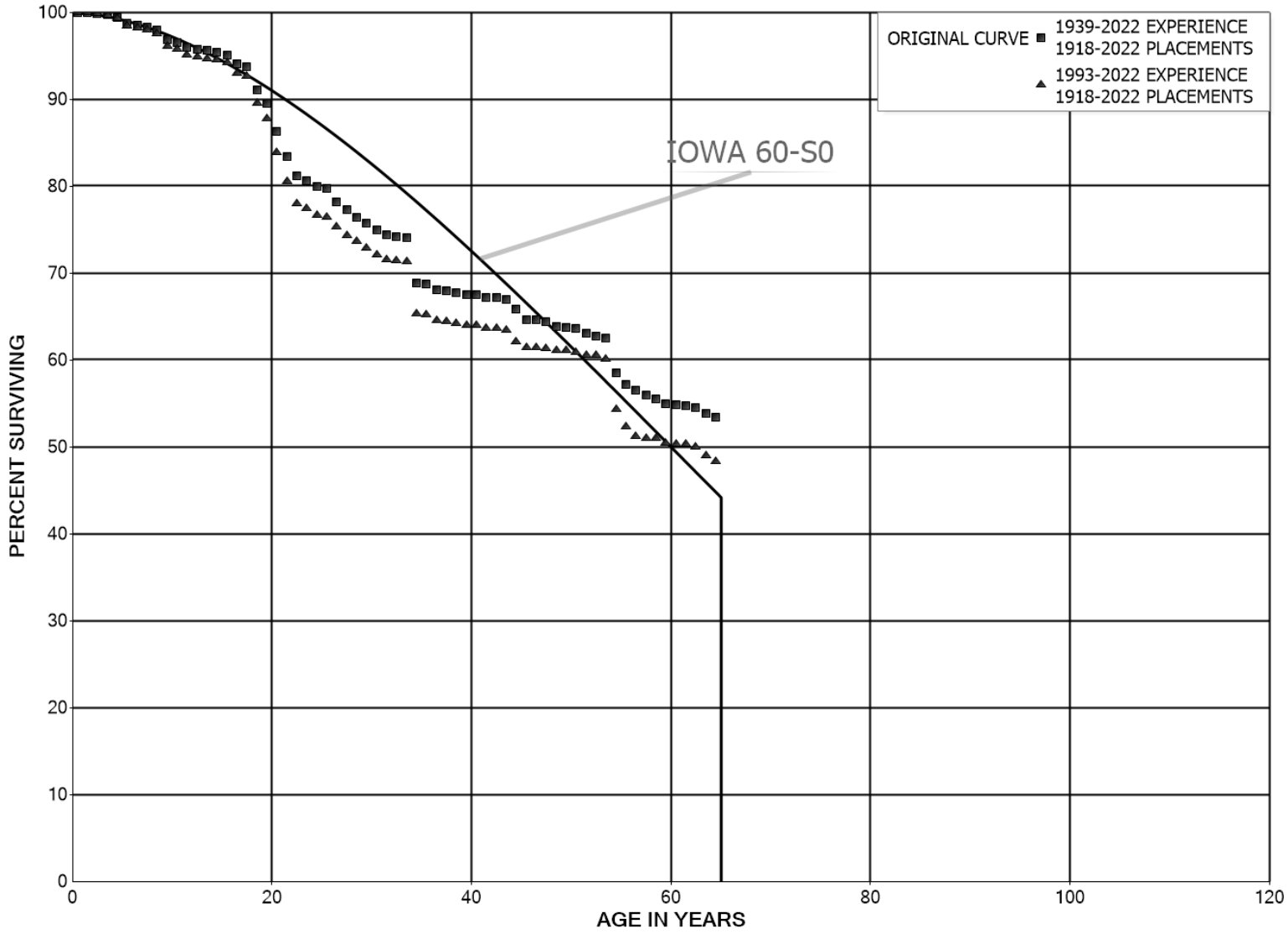
ACCOUNT 385 INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1920-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	3,844		0.0000	1.0000	66.80
80.5	3,844		0.0000	1.0000	66.80
81.5	3,395		0.0000	1.0000	66.80
82.5	3,104		0.0000	1.0000	66.80
83.5	2,731		0.0000	1.0000	66.80
84.5	1,183		0.0000	1.0000	66.80
85.5	1,010		0.0000	1.0000	66.80
86.5	1,010		0.0000	1.0000	66.80
87.5	1,010		0.0000	1.0000	66.80
88.5	1,010		0.0000	1.0000	66.80
89.5	158		0.0000	1.0000	66.80
90.5	158		0.0000	1.0000	66.80
91.5	158		0.0000	1.0000	66.80
92.5	112		0.0000	1.0000	66.80
93.5					66.80

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
STRUCTURES AND IMPROVEMENTS - SERVICE CENTERS
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

STRUCTURES AND IMPROVEMENTS - SERVICE CENTERS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1918-2022 EXPERIENCE BAND 1939-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	11,713,316		0.0000	1.0000	100.00
0.5	11,512,964	5,759	0.0005	0.9995	100.00
1.5	11,322,206	11,665	0.0010	0.9990	99.95
2.5	10,525,780	18,128	0.0017	0.9983	99.85
3.5	10,199,100	26,670	0.0026	0.9974	99.68
4.5	10,059,345	67,372	0.0067	0.9933	99.41
5.5	9,508,858	24,127	0.0025	0.9975	98.75
6.5	9,367,530	24,270	0.0026	0.9974	98.50
7.5	9,218,654	31,328	0.0034	0.9966	98.24
8.5	8,950,312	101,542	0.0113	0.9887	97.91
9.5	8,724,720	23,570	0.0027	0.9973	96.80
10.5	8,380,065	48,020	0.0057	0.9943	96.54
11.5	8,214,287	21,146	0.0026	0.9974	95.98
12.5	8,113,601	14,367	0.0018	0.9982	95.74
13.5	7,998,523	15,363	0.0019	0.9981	95.57
14.5	7,863,417	24,340	0.0031	0.9969	95.38
15.5	7,129,407	79,921	0.0112	0.9888	95.09
16.5	6,975,882	21,110	0.0030	0.9970	94.02
17.5	6,827,569	191,324	0.0280	0.9720	93.74
18.5	6,543,240	115,965	0.0177	0.9823	91.11
19.5	6,133,433	223,159	0.0364	0.9636	89.50
20.5	5,846,299	191,262	0.0327	0.9673	86.24
21.5	5,465,904	150,594	0.0276	0.9724	83.42
22.5	5,225,076	32,906	0.0063	0.9937	81.12
23.5	4,977,109	43,032	0.0086	0.9914	80.61
24.5	4,541,422	10,358	0.0023	0.9977	79.91
25.5	4,351,308	84,764	0.0195	0.9805	79.73
26.5	3,445,048	36,934	0.0107	0.9893	78.18
27.5	2,700,771	32,130	0.0119	0.9881	77.34
28.5	2,648,993	24,683	0.0093	0.9907	76.42
29.5	2,511,601	24,410	0.0097	0.9903	75.71
30.5	2,476,437	20,761	0.0084	0.9916	74.97
31.5	2,404,442	5,937	0.0025	0.9975	74.34
32.5	2,129,449	4,002	0.0019	0.9981	74.16
33.5	2,105,341	148,055	0.0703	0.9297	74.02
34.5	1,934,673	2,590	0.0013	0.9987	68.81
35.5	1,928,153	18,442	0.0096	0.9904	68.72
36.5	1,447,168	1,428	0.0010	0.9990	68.06
37.5	1,409,973	5,001	0.0035	0.9965	68.00
38.5	1,382,316	5,297	0.0038	0.9962	67.76

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

STRUCTURES AND IMPROVEMENTS - SERVICE CENTERS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1918-2022 EXPERIENCE BAND 1939-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	1,302,649	153	0.0001	0.9999	67.50
40.5	1,279,811	5,578	0.0044	0.9956	67.49
41.5	1,240,434	1,182	0.0010	0.9990	67.19
42.5	1,204,704	3,036	0.0025	0.9975	67.13
43.5	859,302	14,505	0.0169	0.9831	66.96
44.5	832,405	14,754	0.0177	0.9823	65.83
45.5	781,305	1,204	0.0015	0.9985	64.66
46.5	778,111	1,782	0.0023	0.9977	64.56
47.5	773,774	7,118	0.0092	0.9908	64.42
48.5	761,092	775	0.0010	0.9990	63.82
49.5	742,501	1,788	0.0024	0.9976	63.76
50.5	688,545	5,786	0.0084	0.9916	63.61
51.5	664,778	3,591	0.0054	0.9946	63.07
52.5	559,341	2,235	0.0040	0.9960	62.73
53.5	555,630	35,322	0.0636	0.9364	62.48
54.5	516,996	11,977	0.0232	0.9768	58.51
55.5	423,892	5,174	0.0122	0.9878	57.15
56.5	417,909	3,427	0.0082	0.9918	56.45
57.5	414,120	3,963	0.0096	0.9904	55.99
58.5	409,966	4,056	0.0099	0.9901	55.46
59.5	392,303	683	0.0017	0.9983	54.91
60.5	339,754	535	0.0016	0.9984	54.81
61.5	338,183	1,654	0.0049	0.9951	54.73
62.5	336,278	3,603	0.0107	0.9893	54.46
63.5	332,649	2,944	0.0089	0.9911	53.87
64.5	329,614	3,600	0.0109	0.9891	53.40
65.5	190,874	1,700	0.0089	0.9911	52.81
66.5	189,174	25	0.0001	0.9999	52.34
67.5	182,263	2,014	0.0110	0.9890	52.34
68.5	180,174	3,962	0.0220	0.9780	51.76
69.5	163,840	2,413	0.0147	0.9853	50.62
70.5	153,606	264	0.0017	0.9983	49.88
71.5	125,107	11,933	0.0954	0.9046	49.79
72.5	43,918	20,526	0.4674	0.5326	45.04
73.5	23,056		0.0000	1.0000	23.99
74.5	23,056		0.0000	1.0000	23.99
75.5	22,820		0.0000	1.0000	23.99
76.5	22,820		0.0000	1.0000	23.99
77.5	22,493	115	0.0051	0.9949	23.99
78.5	22,368		0.0000	1.0000	23.87

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
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STRUCTURES AND IMPROVEMENTS - SERVICE CENTERS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1918-2022 EXPERIENCE BAND 1939-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	22,368		0.0000	1.0000	23.87
80.5	22,368		0.0000	1.0000	23.87
81.5	22,368	22	0.0010	0.9990	23.87
82.5	22,346	628	0.0281	0.9719	23.84
83.5	21,136		0.0000	1.0000	23.17
84.5	20,925		0.0000	1.0000	23.17
85.5	18,166		0.0000	1.0000	23.17
86.5	8,262		0.0000	1.0000	23.17
87.5	8,262		0.0000	1.0000	23.17
88.5	8,262		0.0000	1.0000	23.17
89.5	8,262	7,500	0.9077	0.0923	23.17
90.5	763	136	0.1784	0.8216	2.14
91.5	627		0.0000	1.0000	1.76
92.5	627	627	1.0000		1.76
93.5					

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

STRUCTURES AND IMPROVEMENTS - SERVICE CENTERS

ORIGINAL LIFE TABLE

PLACEMENT BAND 1918-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	7,928,977		0.0000	1.0000	100.00
0.5	7,809,187	4,661	0.0006	0.9994	100.00
1.5	7,720,444	6,186	0.0008	0.9992	99.94
2.5	7,384,739	16,313	0.0022	0.9978	99.86
3.5	7,140,665	22,740	0.0032	0.9968	99.64
4.5	7,102,133	66,619	0.0094	0.9906	99.32
5.5	6,653,663	10,892	0.0016	0.9984	98.39
6.5	7,096,082	21,197	0.0030	0.9970	98.23
7.5	6,956,220	29,591	0.0043	0.9957	97.94
8.5	6,867,210	99,482	0.0145	0.9855	97.52
9.5	6,681,207	22,779	0.0034	0.9966	96.11
10.5	6,540,370	46,024	0.0070	0.9930	95.78
11.5	6,439,534	19,450	0.0030	0.9970	95.11
12.5	6,402,047	10,550	0.0016	0.9984	94.82
13.5	6,683,013	14,612	0.0022	0.9978	94.66
14.5	6,618,404	18,754	0.0028	0.9972	94.45
15.5	5,937,097	79,225	0.0133	0.9867	94.19
16.5	5,787,906	21,006	0.0036	0.9964	92.93
17.5	5,657,717	185,800	0.0328	0.9672	92.59
18.5	5,409,411	111,610	0.0206	0.9794	89.55
19.5	5,037,364	219,752	0.0436	0.9564	87.70
20.5	4,810,772	190,917	0.0397	0.9603	83.88
21.5	4,527,913	148,800	0.0329	0.9671	80.55
22.5	4,421,497	31,552	0.0071	0.9929	77.90
23.5	4,246,337	41,554	0.0098	0.9902	77.35
24.5	3,851,587	8,853	0.0023	0.9977	76.59
25.5	3,763,022	55,299	0.0147	0.9853	76.41
26.5	2,870,553	36,721	0.0128	0.9872	75.29
27.5	2,137,732	19,616	0.0092	0.9908	74.33
28.5	2,101,530	23,159	0.0110	0.9890	73.65
29.5	1,979,974	21,240	0.0107	0.9893	72.83
30.5	2,007,068	14,959	0.0075	0.9925	72.05
31.5	1,975,644	2,659	0.0013	0.9987	71.52
32.5	1,713,025	2,108	0.0012	0.9988	71.42
33.5	1,690,843	144,547	0.0855	0.9145	71.33
34.5	1,524,932	2,240	0.0015	0.9985	65.23
35.5	1,683,396	16,521	0.0098	0.9902	65.14
36.5	1,204,587	966	0.0008	0.9992	64.50
37.5	1,168,661	4,747	0.0041	0.9959	64.45
38.5	1,183,439	5,297	0.0045	0.9955	64.19

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
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STRUCTURES AND IMPROVEMENTS - SERVICE CENTERS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1918-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	1,104,230	103	0.0001	0.9999	63.90
40.5	1,084,761	4,678	0.0043	0.9957	63.89
41.5	1,057,584	638	0.0006	0.9994	63.62
42.5	1,010,870	3,036	0.0030	0.9970	63.58
43.5	637,432	13,644	0.0214	0.9786	63.39
44.5	597,932	5,627	0.0094	0.9906	62.03
45.5	567,397	44	0.0001	0.9999	61.45
46.5	565,535	1,782	0.0032	0.9968	61.44
47.5	562,115	1,312	0.0023	0.9977	61.25
48.5	555,276	775	0.0014	0.9986	61.11
49.5	536,988	1,731	0.0032	0.9968	61.02
50.5	483,781	2,721	0.0056	0.9944	60.82
51.5	463,429	69	0.0001	0.9999	60.48
52.5	361,521	2,169	0.0060	0.9940	60.47
53.5	362,574	35,322	0.0974	0.9026	60.11
54.5	324,540	11,577	0.0357	0.9643	54.25
55.5	235,229	5,174	0.0220	0.9780	52.32
56.5	239,348	1,027	0.0043	0.9957	51.17
57.5	237,985	46	0.0002	0.9998	50.95
58.5	244,554	2,495	0.0102	0.9898	50.94
59.5	228,451	683	0.0030	0.9970	50.42
60.5	175,903		0.0000	1.0000	50.27
61.5	174,900	1,279	0.0073	0.9927	50.27
62.5	194,404	3,603	0.0185	0.9815	49.90
63.5	206,416	2,944	0.0143	0.9857	48.98
64.5	212,481	3,600	0.0169	0.9831	48.28
65.5	75,290	1,700	0.0226	0.9774	47.46
66.5	160,221	25	0.0002	0.9998	46.39
67.5	173,836	2,014	0.0116	0.9884	46.38
68.5	171,747	3,962	0.0231	0.9769	45.84
69.5	155,413	2,243	0.0144	0.9856	44.79
70.5	145,348	134	0.0009	0.9991	44.14
71.5	116,980	11,933	0.1020	0.8980	44.10
72.5	35,791	20,526	0.5735	0.4265	39.60
73.5	14,929		0.0000	1.0000	16.89
74.5	23,056		0.0000	1.0000	16.89
75.5	22,820		0.0000	1.0000	16.89
76.5	22,820		0.0000	1.0000	16.89
77.5	22,493	115	0.0051	0.9949	16.89
78.5	22,368		0.0000	1.0000	16.80

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

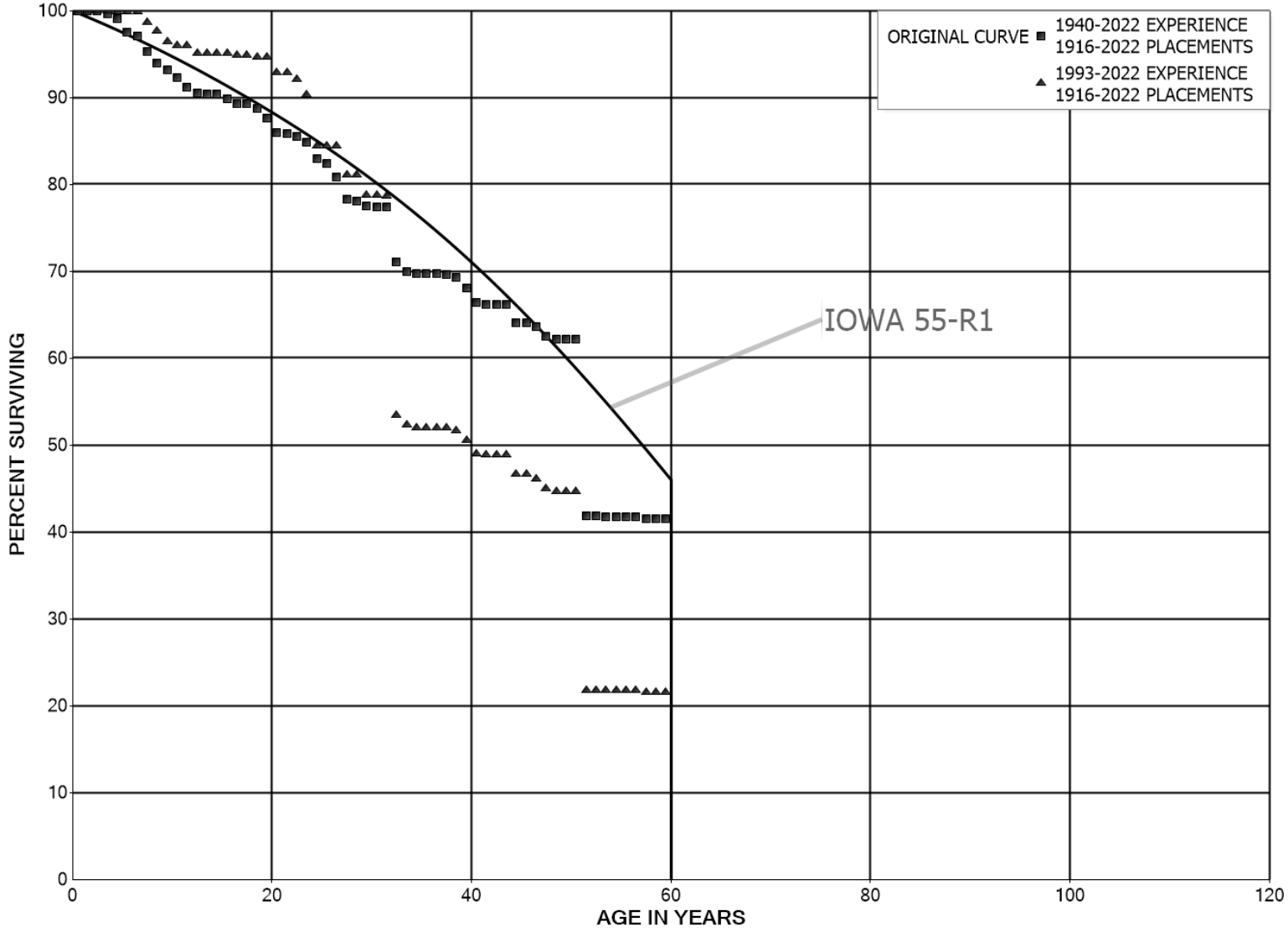
STRUCTURES AND IMPROVEMENTS - SERVICE CENTERS

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1918-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	22,368		0.0000	1.0000	16.80
80.5	22,368		0.0000	1.0000	16.80
81.5	22,368	22	0.0010	0.9990	16.80
82.5	22,346	628	0.0281	0.9719	16.79
83.5	21,136		0.0000	1.0000	16.31
84.5	20,925		0.0000	1.0000	16.31
85.5	18,166		0.0000	1.0000	16.31
86.5	8,262		0.0000	1.0000	16.31
87.5	8,262		0.0000	1.0000	16.31
88.5	8,262		0.0000	1.0000	16.31
89.5	8,262	7,500	0.9077	0.0923	16.31
90.5	763	136	0.1784	0.8216	1.51
91.5	627		0.0000	1.0000	1.24
92.5	627	627	1.0000		1.24
93.5					

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
STRUCTURES AND IMPROVEMENTS - OFFICES
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

STRUCTURES AND IMPROVEMENTS - OFFICES

ORIGINAL LIFE TABLE

PLACEMENT BAND 1916-2022 EXPERIENCE BAND 1940-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	3,256,723		0.0000	1.0000	100.00
0.5	3,251,999		0.0000	1.0000	100.00
1.5	3,264,436	2,642	0.0008	0.9992	100.00
2.5	3,232,397	8,679	0.0027	0.9973	99.92
3.5	3,230,462	19,045	0.0059	0.9941	99.65
4.5	3,017,639	48,840	0.0162	0.9838	99.06
5.5	2,913,176	11,143	0.0038	0.9962	97.46
6.5	2,907,707	54,372	0.0187	0.9813	97.09
7.5	2,690,982	36,030	0.0134	0.9866	95.27
8.5	2,616,900	23,650	0.0090	0.9910	94.00
9.5	2,535,808	22,344	0.0088	0.9912	93.15
10.5	2,380,789	29,738	0.0125	0.9875	92.33
11.5	2,234,070	16,522	0.0074	0.9926	91.17
12.5	1,930,396	1,575	0.0008	0.9992	90.50
13.5	1,862,979	135	0.0001	0.9999	90.42
14.5	1,799,433	10,521	0.0058	0.9942	90.42
15.5	1,579,679	10,036	0.0064	0.9936	89.89
16.5	1,535,727	1,046	0.0007	0.9993	89.32
17.5	1,233,381	8,088	0.0066	0.9934	89.26
18.5	1,127,886	12,894	0.0114	0.9886	88.67
19.5	1,012,705	19,657	0.0194	0.9806	87.66
20.5	981,382	805	0.0008	0.9992	85.96
21.5	962,718	4,668	0.0048	0.9952	85.89
22.5	814,996	6,026	0.0074	0.9926	85.47
23.5	749,442	17,122	0.0228	0.9772	84.84
24.5	637,254	3,513	0.0055	0.9945	82.90
25.5	647,433	12,381	0.0191	0.9809	82.44
26.5	589,448	19,014	0.0323	0.9677	80.87
27.5	560,234	1,587	0.0028	0.9972	78.26
28.5	559,730	4,081	0.0073	0.9927	78.04
29.5	554,491	440	0.0008	0.9992	77.47
30.5	553,666	340	0.0006	0.9994	77.41
31.5	551,570	44,846	0.0813	0.9187	77.36
32.5	460,083	7,090	0.0154	0.9846	71.07
33.5	448,961	1,400	0.0031	0.9969	69.97
34.5	447,361	78	0.0002	0.9998	69.76
35.5	447,283		0.0000	1.0000	69.74
36.5	446,869	935	0.0021	0.9979	69.74
37.5	417,626	2,035	0.0049	0.9951	69.60
38.5	415,590	7,406	0.0178	0.9822	69.26

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

STRUCTURES AND IMPROVEMENTS - OFFICES

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1916-2022 EXPERIENCE BAND 1940-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	408,184	10,003	0.0245	0.9755	68.02
40.5	414,615	963	0.0023	0.9977	66.36
41.5	338,750	161	0.0005	0.9995	66.20
42.5	335,618		0.0000	1.0000	66.17
43.5	261,559	8,333	0.0319	0.9681	66.17
44.5	253,769		0.0000	1.0000	64.06
45.5	249,569	1,769	0.0071	0.9929	64.06
46.5	247,801	4,301	0.0174	0.9826	63.61
47.5	243,499	1,082	0.0044	0.9956	62.50
48.5	240,799		0.0000	1.0000	62.23
49.5	235,887		0.0000	1.0000	62.23
50.5	233,398	76,578	0.3281	0.6719	62.23
51.5	151,604		0.0000	1.0000	41.81
52.5	151,934	167	0.0011	0.9989	41.81
53.5	151,560		0.0000	1.0000	41.76
54.5	149,686		0.0000	1.0000	41.76
55.5	149,629		0.0000	1.0000	41.76
56.5	149,299	790	0.0053	0.9947	41.76
57.5	147,355		0.0000	1.0000	41.54
58.5	146,781		0.0000	1.0000	41.54
59.5	167,294		0.0000	1.0000	41.54
60.5	146,037		0.0000	1.0000	41.54
61.5	145,997		0.0000	1.0000	41.54
62.5	83,768		0.0000	1.0000	41.54
63.5	62,112		0.0000	1.0000	41.54
64.5	62,112		0.0000	1.0000	41.54
65.5	62,112		0.0000	1.0000	41.54
66.5	62,112		0.0000	1.0000	41.54
67.5	62,112	600	0.0097	0.9903	41.54
68.5	61,512		0.0000	1.0000	41.14
69.5	61,512		0.0000	1.0000	41.14
70.5	15,834		0.0000	1.0000	41.14
71.5	15,834		0.0000	1.0000	41.14
72.5	15,834	300	0.0189	0.9811	41.14
73.5	15,534		0.0000	1.0000	40.36
74.5	31,067		0.0000	1.0000	40.36
75.5	15,534		0.0000	1.0000	40.36
76.5	15,534		0.0000	1.0000	40.36
77.5	15,534		0.0000	1.0000	40.36
78.5					40.36

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

STRUCTURES AND IMPROVEMENTS - OFFICES

ORIGINAL LIFE TABLE

PLACEMENT BAND 1916-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	1,061,393		0.0000	1.0000	100.00
0.5	1,157,035		0.0000	1.0000	100.00
1.5	1,160,631		0.0000	1.0000	100.00
2.5	1,311,834		0.0000	1.0000	100.00
3.5	1,340,822	1,728	0.0013	0.9987	100.00
4.5	1,239,052		0.0000	1.0000	99.87
5.5	1,337,138	250	0.0002	0.9998	99.87
6.5	1,383,328	16,394	0.0119	0.9881	99.85
7.5	1,223,282	12,631	0.0103	0.9897	98.67
8.5	1,241,798	15,300	0.0123	0.9877	97.65
9.5	1,190,470	5,477	0.0046	0.9954	96.45
10.5	1,128,765		0.0000	1.0000	96.00
11.5	1,056,703	10,228	0.0097	0.9903	96.00
12.5	1,119,929		0.0000	1.0000	95.07
13.5	1,159,144		0.0000	1.0000	95.07
14.5	1,108,115		0.0000	1.0000	95.07
15.5	907,408	2,213	0.0024	0.9976	95.07
16.5	872,898		0.0000	1.0000	94.84
17.5	566,055	1,478	0.0026	0.9974	94.84
18.5	432,407		0.0000	1.0000	94.59
19.5	388,675	7,051	0.0181	0.9819	94.59
20.5	423,875	300	0.0007	0.9993	92.88
21.5	441,235	3,550	0.0080	0.9920	92.81
22.5	296,043	5,889	0.0199	0.9801	92.07
23.5	266,010	17,122	0.0644	0.9356	90.23
24.5	156,550		0.0000	1.0000	84.43
25.5	151,299		0.0000	1.0000	84.43
26.5	138,104	5,427	0.0393	0.9607	84.43
27.5	134,881		0.0000	1.0000	81.11
28.5	136,919	3,967	0.0290	0.9710	81.11
29.5	133,742		0.0000	1.0000	78.76
30.5	135,065	340	0.0025	0.9975	78.76
31.5	139,493	44,639	0.3200	0.6800	78.56
32.5	274,940	5,967	0.0217	0.9783	53.42
33.5	265,140	1,400	0.0053	0.9947	52.26
34.5	263,740	78	0.0003	0.9997	51.99
35.5	338,648		0.0000	1.0000	51.97
36.5	338,351	185	0.0005	0.9995	51.97
37.5	312,828	2,035	0.0065	0.9935	51.94
38.5	345,205	7,406	0.0215	0.9785	51.60

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

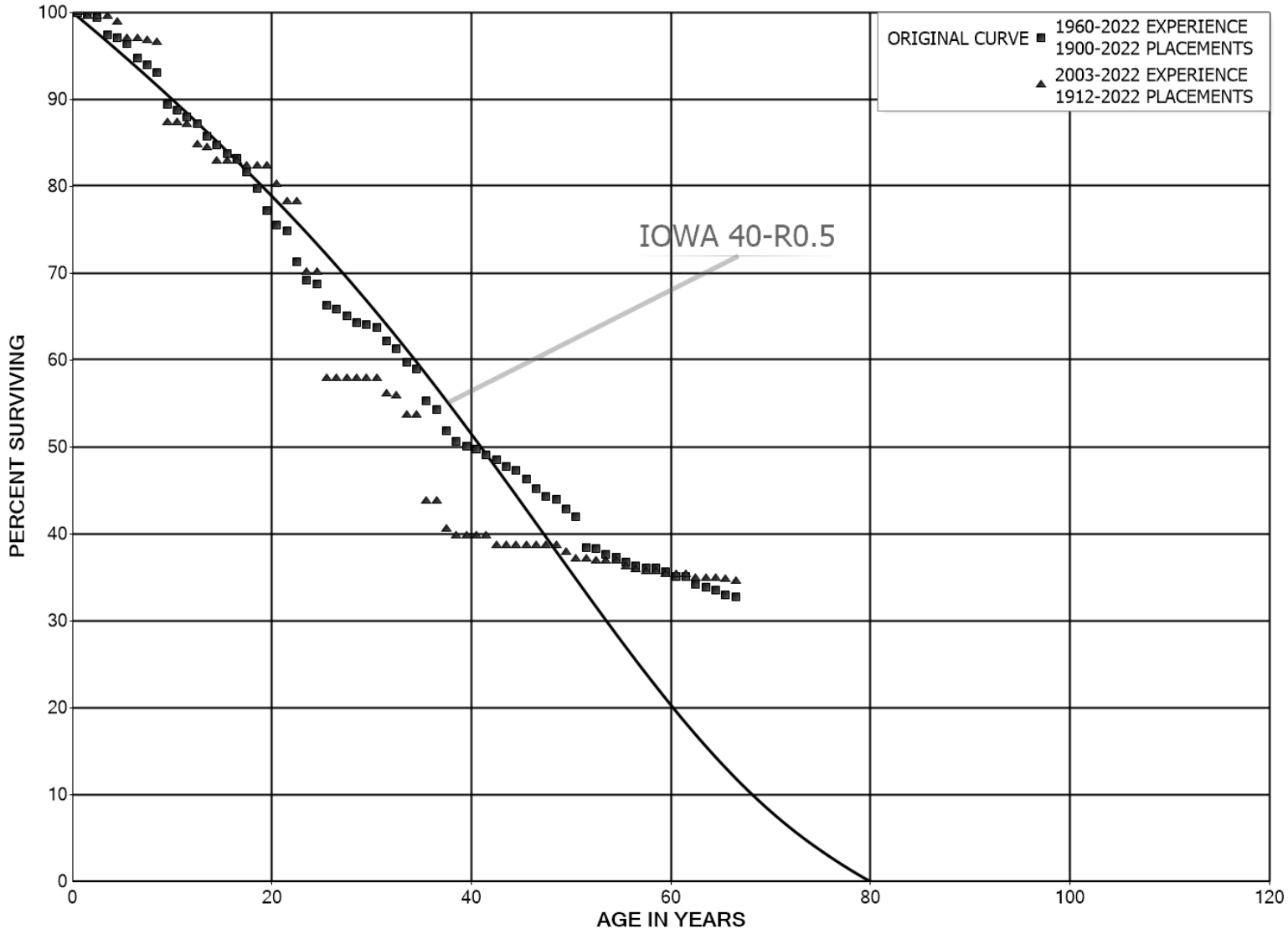
STRUCTURES AND IMPROVEMENTS - OFFICES

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1916-2022 EXPERIENCE BAND 1993-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	337,799	10,003	0.0296	0.9704	50.50
40.5	328,775	963	0.0029	0.9971	49.00
41.5	252,910	161	0.0006	0.9994	48.86
42.5	249,778		0.0000	1.0000	48.83
43.5	176,796	8,033	0.0454	0.9546	48.83
44.5	168,763		0.0000	1.0000	46.61
45.5	165,294	1,769	0.0107	0.9893	46.61
46.5	164,068	4,301	0.0262	0.9738	46.11
47.5	159,767	1,082	0.0068	0.9932	44.90
48.5	157,066		0.0000	1.0000	44.60
49.5	152,154		0.0000	1.0000	44.60
50.5	149,666	76,578	0.5117	0.4883	44.60
51.5	67,872		0.0000	1.0000	21.78
52.5	67,872	80	0.0012	0.9988	21.78
53.5	67,545		0.0000	1.0000	21.75
54.5	65,983		0.0000	1.0000	21.75
55.5	66,023		0.0000	1.0000	21.75
56.5	65,750	790	0.0120	0.9880	21.75
57.5	63,766		0.0000	1.0000	21.49
58.5	63,094		0.0000	1.0000	21.49
59.5	62,529		0.0000	1.0000	21.49
60.5	62,668		0.0000	1.0000	21.49
61.5	83,885		0.0000	1.0000	21.49
62.5	21,656		0.0000	1.0000	21.49
63.5					21.49
64.5					
65.5	45,678		0.0000		
66.5	45,678		0.0000		
67.5	45,678		0.0000		
68.5	45,678		0.0000		
69.5	45,678		0.0000		
70.5					
71.5					
72.5					
73.5					
74.5					
75.5					
76.5	15,534		0.0000		
77.5	15,534		0.0000		
78.5					

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
STRUCTURES AND IMPROVEMENTS - SMALL
ORIGINAL AND SMOOTH SURVIVOR CURVES



NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

STRUCTURES AND IMPROVEMENTS - SMALL

ORIGINAL LIFE TABLE

PLACEMENT BAND 1900-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	1,614,761	1,219	0.0008	0.9992	100.00
0.5	1,637,032	3,278	0.0020	0.9980	99.92
1.5	1,634,865	6,264	0.0038	0.9962	99.72
2.5	1,567,969	31,471	0.0201	0.9799	99.34
3.5	1,583,181	4,164	0.0026	0.9974	97.35
4.5	1,570,922	11,185	0.0071	0.9929	97.09
5.5	1,539,088	26,587	0.0173	0.9827	96.40
6.5	1,559,597	12,224	0.0078	0.9922	94.74
7.5	1,503,549	13,990	0.0093	0.9907	93.99
8.5	1,465,497	59,082	0.0403	0.9597	93.12
9.5	1,414,972	10,987	0.0078	0.9922	89.36
10.5	1,388,477	11,138	0.0080	0.9920	88.67
11.5	1,316,440	10,941	0.0083	0.9917	87.96
12.5	1,245,110	22,209	0.0178	0.9822	87.23
13.5	1,183,472	13,166	0.0111	0.9889	85.67
14.5	989,767	11,085	0.0112	0.9888	84.72
15.5	911,288	6,583	0.0072	0.9928	83.77
16.5	848,627	15,652	0.0184	0.9816	83.17
17.5	790,891	18,959	0.0240	0.9760	81.63
18.5	745,152	23,345	0.0313	0.9687	79.67
19.5	722,288	15,585	0.0216	0.9784	77.18
20.5	674,951	5,813	0.0086	0.9914	75.51
21.5	630,946	30,446	0.0483	0.9517	74.86
22.5	575,018	16,804	0.0292	0.9708	71.25
23.5	579,182	3,582	0.0062	0.9938	69.17
24.5	572,264	20,234	0.0354	0.9646	68.74
25.5	551,490	3,750	0.0068	0.9932	66.31
26.5	553,286	6,380	0.0115	0.9885	65.86
27.5	553,567	6,811	0.0123	0.9877	65.10
28.5	572,431	2,139	0.0037	0.9963	64.30
29.5	614,378	3,268	0.0053	0.9947	64.06
30.5	616,428	14,915	0.0242	0.9758	63.72
31.5	556,640	7,537	0.0135	0.9865	62.18
32.5	554,379	14,614	0.0264	0.9736	61.33
33.5	569,757	7,684	0.0135	0.9865	59.72
34.5	568,294	35,330	0.0622	0.9378	58.91
35.5	534,670	8,995	0.0168	0.9832	55.25
36.5	525,793	24,577	0.0467	0.9533	54.32
37.5	502,008	11,016	0.0219	0.9781	51.78
38.5	504,349	5,239	0.0104	0.9896	50.64

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

STRUCTURES AND IMPROVEMENTS - SMALL

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1900-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	497,658	4,149	0.0083	0.9917	50.12
40.5	484,391	6,730	0.0139	0.9861	49.70
41.5	480,636	5,279	0.0110	0.9890	49.01
42.5	465,139	7,000	0.0150	0.9850	48.47
43.5	496,722	4,821	0.0097	0.9903	47.74
44.5	469,991	9,760	0.0208	0.9792	47.28
45.5	450,885	10,884	0.0241	0.9759	46.30
46.5	434,073	8,826	0.0203	0.9797	45.18
47.5	423,817	3,147	0.0074	0.9926	44.26
48.5	410,766	10,691	0.0260	0.9740	43.93
49.5	390,295	8,125	0.0208	0.9792	42.79
50.5	373,773	31,236	0.0836	0.9164	41.90
51.5	306,382	1,114	0.0036	0.9964	38.40
52.5	287,206	5,099	0.0178	0.9822	38.26
53.5	275,967	2,179	0.0079	0.9921	37.58
54.5	265,357	4,163	0.0157	0.9843	37.28
55.5	248,252	2,508	0.0101	0.9899	36.70
56.5	231,569	1,313	0.0057	0.9943	36.33
57.5	204,881	530	0.0026	0.9974	36.12
58.5	202,942	2,118	0.0104	0.9896	36.03
59.5	193,052	3,258	0.0169	0.9831	35.65
60.5	184,481	49	0.0003	0.9997	35.05
61.5	181,672	4,271	0.0235	0.9765	35.04
62.5	168,351	2,039	0.0121	0.9879	34.22
63.5	158,313	1,316	0.0083	0.9917	33.80
64.5	149,840	2,315	0.0154	0.9846	33.52
65.5	142,405	1,187	0.0083	0.9917	33.00
66.5	120,924	3,200	0.0265	0.9735	32.73
67.5	106,367	771	0.0072	0.9928	31.86
68.5	96,880	661	0.0068	0.9932	31.63
69.5	93,664	603	0.0064	0.9936	31.41
70.5	85,778	5,112	0.0596	0.9404	31.21
71.5	75,921	1,154	0.0152	0.9848	29.35
72.5	72,243	26,393	0.3653	0.6347	28.91
73.5	41,919	135	0.0032	0.9968	18.35
74.5	40,565		0.0000	1.0000	18.29
75.5	38,652	584	0.0151	0.9849	18.29
76.5	36,358	413	0.0113	0.9887	18.01
77.5	35,877	510	0.0142	0.9858	17.81
78.5	34,554	741	0.0214	0.9786	17.55

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

STRUCTURES AND IMPROVEMENTS - SMALL

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1900-2022 EXPERIENCE BAND 1960-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	33,183	1,682	0.0507	0.9493	17.18
80.5	30,064	297	0.0099	0.9901	16.31
81.5	29,445	255	0.0087	0.9913	16.14
82.5	28,999		0.0000	1.0000	16.01
83.5	28,334	152	0.0054	0.9946	16.01
84.5	27,042	3,055	0.1130	0.8870	15.92
85.5	23,808	350	0.0147	0.9853	14.12
86.5	23,034		0.0000	1.0000	13.91
87.5	22,460	398	0.0177	0.9823	13.91
88.5	21,750	271	0.0125	0.9875	13.67
89.5	21,448	177	0.0082	0.9918	13.50
90.5	20,958		0.0000	1.0000	13.39
91.5	20,189	400	0.0198	0.9802	13.39
92.5	18,940	178	0.0094	0.9906	13.12
93.5	15,475	294	0.0190	0.9810	13.00
94.5	12,585	120	0.0095	0.9905	12.75
95.5	11,220		0.0000	1.0000	12.63
96.5	11,170		0.0000	1.0000	12.63
97.5	9,560	393	0.0411	0.9589	12.63
98.5	7,458	346	0.0464	0.9536	12.11
99.5	7,111		0.0000	1.0000	11.55
100.5	6,408		0.0000	1.0000	11.55
101.5	6,182		0.0000	1.0000	11.55
102.5	5,675		0.0000	1.0000	11.55
103.5	4,031		0.0000	1.0000	11.55
104.5	4,031	165	0.0409	0.9591	11.55
105.5	3,866	200	0.0517	0.9483	11.07
106.5	310		0.0000	1.0000	10.50
107.5	310		0.0000	1.0000	10.50
108.5	310		0.0000	1.0000	10.50
109.5	310		0.0000	1.0000	10.50
110.5					10.50

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

STRUCTURES AND IMPROVEMENTS - SMALL

ORIGINAL LIFE TABLE

PLACEMENT BAND 1912-2022 EXPERIENCE BAND 2003-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
0.0	551,156		0.0000	1.0000	100.00
0.5	548,940	2,463	0.0045	0.9955	100.00
1.5	506,349	500	0.0010	0.9990	99.55
2.5	477,212		0.0000	1.0000	99.45
3.5	448,372	2,802	0.0062	0.9938	99.45
4.5	449,866	8,513	0.0189	0.9811	98.83
5.5	396,230		0.0000	1.0000	96.96
6.5	386,678	1,041	0.0027	0.9973	96.96
7.5	327,903	831	0.0025	0.9975	96.70
8.5	278,823	26,515	0.0951	0.9049	96.46
9.5	259,809		0.0000	1.0000	87.28
10.5	241,957	517	0.0021	0.9979	87.28
11.5	207,896	5,601	0.0269	0.9731	87.10
12.5	173,934	636	0.0037	0.9963	84.75
13.5	150,648	2,800	0.0186	0.9814	84.44
14.5	150,387		0.0000	1.0000	82.87
15.5	148,064		0.0000	1.0000	82.87
16.5	145,085	1,088	0.0075	0.9925	82.87
17.5	105,815		0.0000	1.0000	82.25
18.5	112,053		0.0000	1.0000	82.25
19.5	111,580	2,831	0.0254	0.9746	82.25
20.5	106,983	2,595	0.0243	0.9757	80.16
21.5	99,131		0.0000	1.0000	78.22
22.5	76,658	7,967	0.1039	0.8961	78.22
23.5	57,715		0.0000	1.0000	70.09
24.5	92,829	16,259	0.1751	0.8249	70.09
25.5	76,733		0.0000	1.0000	57.81
26.5	87,407	1	0.0000	1.0000	57.81
27.5	90,100		0.0000	1.0000	57.81
28.5	90,489		0.0000	1.0000	57.81
29.5	90,404		0.0000	1.0000	57.81
30.5	89,008	2,631	0.0296	0.9704	57.81
31.5	91,300	471	0.0052	0.9948	56.10
32.5	108,344	4,300	0.0397	0.9603	55.81
33.5	106,285		0.0000	1.0000	53.60
34.5	112,274	20,648	0.1839	0.8161	53.60
35.5	99,850		0.0000	1.0000	43.74
36.5	106,343	7,841	0.0737	0.9263	43.74
37.5	118,973	2,394	0.0201	0.9799	40.52
38.5	110,877		0.0000	1.0000	39.70

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

STRUCTURES AND IMPROVEMENTS - SMALL

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1912-2022 EXPERIENCE BAND 2003-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
39.5	119,374		0.0000	1.0000	39.70
40.5	119,848		0.0000	1.0000	39.70
41.5	123,790	3,253	0.0263	0.9737	39.70
42.5	129,415		0.0000	1.0000	38.66
43.5	135,247		0.0000	1.0000	38.66
44.5	130,095		0.0000	1.0000	38.66
45.5	135,787		0.0000	1.0000	38.66
46.5	158,346		0.0000	1.0000	38.66
47.5	170,442		0.0000	1.0000	38.66
48.5	180,683	3,776	0.0209	0.9791	38.66
49.5	174,817	3,743	0.0214	0.9786	37.85
50.5	175,254	51	0.0003	0.9997	37.04
51.5	176,824	664	0.0038	0.9962	37.03
52.5	162,568	165	0.0010	0.9990	36.89
53.5	164,950	48	0.0003	0.9997	36.85
54.5	156,227	2,851	0.0182	0.9818	36.84
55.5	146,836	1,500	0.0102	0.9898	36.17
56.5	138,152	675	0.0049	0.9951	35.80
57.5	115,320	128	0.0011	0.9989	35.62
58.5	114,511	849	0.0074	0.9926	35.59
59.5	107,660	255	0.0024	0.9976	35.32
60.5	103,710		0.0000	1.0000	35.24
61.5	101,273	1,070	0.0106	0.9894	35.24
62.5	91,344		0.0000	1.0000	34.87
63.5	84,010	56	0.0007	0.9993	34.87
64.5	77,936	320	0.0041	0.9959	34.84
65.5	72,676	308	0.0042	0.9958	34.70
66.5	52,945	595	0.0112	0.9888	34.55
67.5	41,567	230	0.0055	0.9945	34.16
68.5	33,096		0.0000	1.0000	33.98
69.5	30,571		0.0000	1.0000	33.98
70.5	23,602		0.0000	1.0000	33.98
71.5	19,778	448	0.0226	0.9774	33.98
72.5	17,657		0.0000	1.0000	33.21
73.5	17,013		0.0000	1.0000	33.21
74.5	18,776		0.0000	1.0000	33.21
75.5	18,107		0.0000	1.0000	33.21
76.5	16,976		0.0000	1.0000	33.21
77.5	18,694		0.0000	1.0000	33.21
78.5	20,383		0.0000	1.0000	33.21

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

STRUCTURES AND IMPROVEMENTS - SMALL

ORIGINAL LIFE TABLE, CONT.

PLACEMENT BAND 1912-2022 EXPERIENCE BAND 2003-2022

AGE AT BEGIN OF INTERVAL	EXPOSURES AT BEGINNING OF AGE INTERVAL	RETIREMENTS DURING AGE INTERVAL	RETMT RATIO	SURV RATIO	PCT SURV BEGIN OF INTERVAL
79.5	19,752		0.0000	1.0000	33.21
80.5	19,364		0.0000	1.0000	33.21
81.5	19,267		0.0000	1.0000	33.21
82.5	19,584		0.0000	1.0000	33.21
83.5	20,857	152	0.0073	0.9927	33.21
84.5	19,565	528	0.0270	0.9730	32.96
85.5	18,858		0.0000	1.0000	32.07
86.5	22,453		0.0000	1.0000	32.07
87.5	21,879	398	0.0182	0.9818	32.07
88.5	21,169		0.0000	1.0000	31.49
89.5	21,138	177	0.0084	0.9916	31.49
90.5	20,958		0.0000	1.0000	31.23
91.5	20,189	400	0.0198	0.9802	31.23
92.5	18,940	178	0.0094	0.9906	30.61
93.5	15,475	294	0.0190	0.9810	30.32
94.5	12,585	120	0.0095	0.9905	29.74
95.5	11,220		0.0000	1.0000	29.46
96.5	11,170		0.0000	1.0000	29.46
97.5	9,560	393	0.0411	0.9589	29.46
98.5	7,458	346	0.0464	0.9536	28.25
99.5	7,111		0.0000	1.0000	26.94
100.5	6,408		0.0000	1.0000	26.94
101.5	6,182		0.0000	1.0000	26.94
102.5	5,675		0.0000	1.0000	26.94
103.5	4,031		0.0000	1.0000	26.94
104.5	4,031	165	0.0409	0.9591	26.94
105.5	3,866	200	0.0517	0.9483	25.83
106.5	310		0.0000	1.0000	24.50
107.5	310		0.0000	1.0000	24.50
108.5	310		0.0000	1.0000	24.50
109.5	310		0.0000	1.0000	24.50
110.5					24.50

PART VII. DETAILED DEPRECIATION CALCULATIONS

CUMULATIVE DEPRECIATED ORIGINAL COST

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
CUMULATIVE DEPRECIATED ORIGINAL COST BY YEAR INSTALLED
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR INST (1)	ORIGINAL COST (2)	ACCRUED DEPRECIATION (3)	AMOUNT (2) - (3) (4)	DEPRECIATED ORIGINAL COST CUMULATIVE AMOUNT (5)	DEPRECIATED ORIGINAL COST PCT OF COL 4 TOTAL (6)
1883	3,783.00	3,276.00	507.00	507.00	
1884	1,232.00	1,084.00	148.00	655.00	
1885	2,389.00	2,071.00	318.00	973.00	
1886	19,912.00	17,255.00	2,657.00	3,630.00	
1887	45,191.00	39,256.00	5,935.00	9,565.00	
1888	37,316.00	32,163.00	5,153.00	14,718.00	
1889	331.00	294.00	37.00	14,755.00	
1890	75.00	72.00	3.00	14,758.00	
1891	660.00	579.00	81.00	14,839.00	
1892	1,152.00	1,004.00	148.00	14,987.00	
1893	534.00	459.00	75.00	15,062.00	
1894	304.00	268.00	36.00	15,098.00	
1895	536.00	469.00	67.00	15,165.00	
1896	395.00	355.00	40.00	15,205.00	
1897	364.00	340.00	24.00	15,229.00	
1898	253.00	241.00	12.00	15,241.00	
1899	49,106.00	41,331.00	7,775.00	23,016.00	
1900	10.00	10.00		23,016.00	
1901	824.00	779.00	45.00	23,061.00	
1902	2,731.00	2,603.00	128.00	23,189.00	
1903	3,843.00	3,745.00	98.00	23,287.00	
1904	2,455.00	2,445.00	10.00	23,297.00	
1905	2,559.00	2,492.00	67.00	23,364.00	
1906	2,128.00	2,124.00	4.00	23,368.00	
1907	2,202.00	2,202.00		23,368.00	
1908	1,913.00	1,913.00		23,368.00	
1909	1,651.00	1,629.00	22.00	23,390.00	
1910	1,396.00	1,389.00	7.00	23,397.00	
1911	5,173.00	4,401.00	772.00	24,169.00	
1912	2,574.00	2,201.00	373.00	24,542.00	
1913	2,622.00	2,232.00	390.00	24,932.00	
1914	2,338.00	2,030.00	308.00	25,240.00	
1915	1,455.00	1,364.00	91.00	25,331.00	
1916	157,714.00	137,687.00	20,027.00	45,358.00	
1917	2,700.00	2,310.00	390.00	45,748.00	
1918	8,286.00	7,844.00	442.00	46,190.00	
1919	30,938.00	27,348.00	3,590.00	49,780.00	
1920	8,220.00	7,187.00	1,033.00	50,813.00	
1921	17,130.00	14,229.00	2,901.00	53,714.00	
1922	17,399.00	14,653.00	2,746.00	56,460.00	
1923	10,545.00	9,169.00	1,376.00	57,836.00	
1924	36,686.00	30,029.00	6,657.00	64,493.00	
1925	66,179.00	53,912.00	12,267.00	76,760.00	
1926	120,801.00	95,590.00	25,211.00	101,971.00	
1927	80,590.00	64,116.00	16,474.00	118,445.00	
1928	56,572.00	46,489.00	10,083.00	128,528.00	
1929	86,312.00	68,952.00	17,360.00	145,888.00	
1930	96,338.00	76,269.00	20,069.00	165,957.00	
1931	59,108.00	49,302.00	9,806.00	175,763.00	
1932	27,293.00	22,223.00	5,070.00	180,833.00	
1933	9,071.00	7,647.00	1,424.00	182,257.00	
1934	30,600.00	24,905.00	5,695.00	187,952.00	
1935	42,547.00	34,349.00	8,198.00	196,150.00	
1936	63,400.00	55,069.00	8,331.00	204,481.00	
1937	56,444.00	45,017.00	11,427.00	215,908.00	
1938	52,500.00	41,646.00	10,854.00	226,762.00	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
CUMULATIVE DEPRECIATED ORIGINAL COST BY YEAR INSTALLED
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR INST (1)	ORIGINAL COST (2)	ACCRUED DEPRECIATION (3)	AMOUNT (2) - (3) (4)	DEPRECIATED ORIGINAL COST CUMULATIVE AMOUNT (5)	DEPRECIATED ORIGINAL COST PCT OF COL 4 TOTAL (6)
1939	37,919.00	30,031.00	7,888.00	234,650.00	
1940	28,424.00	22,551.00	5,873.00	240,523.00	
1941	41,396.00	33,118.00	8,278.00	248,801.00	
1942	12,626.00	10,431.00	2,195.00	250,996.00	
1943	92,800.00	87,632.00	5,168.00	256,164.00	
1944	6,416.00	5,274.00	1,142.00	257,306.00	
1945	10,913.00	8,622.00	2,291.00	259,597.00	
1946	43,180.00	33,562.00	9,618.00	269,215.00	
1947	185,590.00	150,171.00	35,419.00	304,634.00	0.10
1948	132,145.00	100,487.00	31,658.00	336,292.00	0.10
1949	223,549.00	166,375.00	57,174.00	393,466.00	0.10
1950	286,581.00	209,321.00	77,260.00	470,726.00	0.10
1951	307,317.00	226,566.00	80,751.00	551,477.00	0.10
1952	224,015.00	169,681.00	54,334.00	605,811.00	0.10
1953	498,028.00	416,041.00	81,987.00	687,798.00	0.10
1954	346,938.00	261,452.00	85,486.00	773,284.00	0.10
1955	1,038,064.00	785,110.00	252,954.00	1,026,238.00	0.20
1956	1,517,042.00	1,184,569.00	332,473.00	1,358,711.00	0.20
1957	738,783.00	583,122.00	155,661.00	1,514,372.00	0.30
1958	279,587.00	205,636.00	73,951.00	1,588,323.00	0.30
1959	541,871.00	406,639.00	135,232.00	1,723,555.00	0.30
1960	335,381.00	259,872.00	75,509.00	1,799,064.00	0.30
1961	392,886.00	295,652.00	97,234.00	1,896,298.00	0.30
1962	354,108.00	269,264.00	84,844.00	1,981,142.00	0.40
1963	500,035.00	373,395.00	126,640.00	2,107,782.00	0.40
1964	606,557.00	443,529.00	163,028.00	2,270,810.00	0.40
1965	1,390,871.00	1,034,372.00	356,499.00	2,627,309.00	0.50
1966	1,698,134.00	1,196,248.00	501,886.00	3,129,195.00	0.60
1967	2,514,060.00	1,822,227.00	691,833.00	3,821,028.00	0.70
1968	1,743,150.00	1,202,289.00	540,861.00	4,361,889.00	0.80
1969	1,953,286.00	1,343,292.00	609,994.00	4,971,883.00	0.90
1970	2,107,625.00	1,465,464.00	642,161.00	5,614,044.00	1.00
1971	2,571,228.00	1,741,935.00	829,293.00	6,443,337.00	1.10
1972	2,516,783.00	1,741,219.00	775,564.00	7,218,901.00	1.30
1973	3,535,858.00	2,451,006.00	1,084,852.00	8,303,753.00	1.50
1974	2,946,364.00	2,013,323.00	933,041.00	9,236,794.00	1.60
1975	2,103,633.00	1,477,660.00	625,973.00	9,862,767.00	1.80
1976	2,232,656.00	1,511,537.00	721,119.00	10,583,886.00	1.90
1977	5,304,336.00	3,500,379.00	1,803,957.00	12,387,843.00	2.20
1978	4,350,404.00	2,782,132.00	1,568,272.00	13,956,115.00	2.50
1979	4,691,867.00	3,208,700.00	1,483,167.00	15,439,282.00	2.70
1980	6,000,665.00	3,907,154.00	2,093,511.00	17,532,793.00	3.10
1981	5,683,179.00	3,694,380.00	1,988,799.00	19,521,592.00	3.50
1982	5,501,755.00	3,498,348.00	2,003,407.00	21,524,999.00	3.80
1983	6,970,888.00	4,372,069.00	2,598,819.00	24,123,818.00	4.30
1984	7,876,825.00	4,815,834.00	3,060,991.00	27,184,809.00	4.80
1985	8,294,028.00	4,941,911.00	3,352,117.00	30,536,926.00	5.40
1986	10,825,417.00	6,530,721.00	4,294,696.00	34,831,622.00	6.20
1987	8,673,032.00	5,146,675.00	3,526,357.00	38,357,979.00	6.80
1988	15,833,376.00	9,320,114.00	6,513,262.00	44,871,241.00	8.00
1989	13,663,879.00	7,911,896.00	5,751,983.00	50,623,224.00	9.00
1990	13,782,378.00	7,843,649.00	5,938,729.00	56,561,953.00	10.10
1991	13,241,238.00	7,273,948.00	5,967,290.00	62,529,243.00	11.10
1992	13,642,130.00	7,348,271.00	6,293,859.00	68,823,102.00	12.30
1993	13,969,832.00	7,463,969.00	6,505,863.00	75,328,965.00	13.40
1994	11,923,645.00	6,244,663.00	5,678,982.00	81,007,947.00	14.40

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
CUMULATIVE DEPRECIATED ORIGINAL COST BY YEAR INSTALLED
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR INST (1)	ORIGINAL COST (2)	ACCRUED DEPRECIATION (3)	AMOUNT (2) - (3) (4)	DEPRECIATED ORIGINAL COST CUMULATIVE AMOUNT (5)	DEPRECIATED ORIGINAL COST PCT OF COL 4 TOTAL (6)
1995	13,462,339.00	7,076,379.00	6,385,960.00	87,393,907.00	15.60
1996	12,578,679.00	6,395,995.00	6,182,684.00	93,576,591.00	16.70
1997	14,478,575.00	7,148,116.00	7,330,459.00	100,907,050.00	18.00
1998	11,658,462.00	5,914,592.00	5,743,870.00	106,650,920.00	19.00
1999	11,865,425.00	5,701,689.00	6,163,736.00	112,814,656.00	20.10
2000	13,294,212.00	7,102,014.00	6,192,198.00	119,006,854.00	21.20
2001	10,256,741.00	5,100,259.00	5,156,482.00	124,163,336.00	22.10
2002	11,623,243.00	5,088,861.00	6,534,382.00	130,697,718.00	23.30
2003	11,356,298.00	4,900,400.00	6,455,898.00	137,153,616.00	24.40
2004	11,148,814.00	4,820,085.00	6,328,729.00	143,482,345.00	25.60
2005	9,493,664.00	3,997,033.00	5,496,631.00	148,978,976.00	26.50
2006	11,204,024.00	4,314,722.00	6,889,302.00	155,868,278.00	27.80
2007	16,074,592.00	6,024,838.00	10,049,754.00	165,918,032.00	29.60
2008	13,044,664.00	4,655,103.00	8,389,561.00	174,307,593.00	31.00
2009	13,972,252.00	4,718,522.00	9,253,730.00	183,561,323.00	32.70
2010	12,538,538.00	4,247,665.00	8,290,873.00	191,852,196.00	34.20
2011	14,876,434.00	5,300,992.00	9,575,442.00	201,427,638.00	35.90
2012	13,452,969.00	4,124,683.00	9,328,286.00	210,755,924.00	37.50
2013	16,591,340.00	4,797,141.00	11,794,199.00	222,550,123.00	39.60
2014	15,315,559.00	4,009,940.00	11,305,619.00	233,855,742.00	41.70
2015	19,162,200.00	5,546,381.00	13,615,819.00	247,471,561.00	44.10
2016	35,125,699.00	20,545,440.00	14,580,259.00	262,051,820.00	46.70
2017	19,319,885.00	4,686,855.00	14,633,030.00	276,684,850.00	49.30
2018	20,169,501.00	3,906,422.00	16,263,079.00	292,947,929.00	52.20
2019	29,143,674.00	4,794,877.00	24,348,797.00	317,296,726.00	56.50
2020	26,521,952.00	4,291,290.00	22,230,662.00	339,527,388.00	60.50
2021	29,294,859.00	4,697,082.00	24,597,777.00	364,125,165.00	64.90
2022	25,722,092.00	3,940,646.00	21,781,446.00	385,906,611.00	68.70
2023	42,683,496.00	4,715,065.00	37,968,431.00	423,875,042.00	75.50
2024	45,150,096.00	2,445,861.00	42,704,235.00	466,579,277.00	83.10
2025	35,614,842.00	1,878,303.00	33,736,539.00	500,315,816.00	89.10
2026	62,755,494.00	1,642,194.00	61,113,300.00	561,429,116.00	100.00
TOTAL	856,612,067.00	295,182,951.00	561,429,116.00		

UTILITY PLANT IN SERVICE

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 303 MISCELLANEOUS INTANGIBLE PLANT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 10-SQUARE						
NET SALVAGE PERCENT: 0						
2000	1,835,295.50	1,835,296	1,835,296			
2001	86,002.52	86,003	86,003			
2004	172,450.99	172,451	172,451			
2005	34,999.69	35,000	35,000			
2011	876,413.25	876,413	876,413			
2012	27,934.56	27,935	27,935			
2013	95,201.98	95,202	95,202			
2014	39,761.48	39,761	39,761			
2015	1,094,952.45	1,094,952	1,094,952			
2016	16,231,676.82	16,231,677	16,231,677			
2017	560,328.17	518,304	517,801	42,527	1.00	42,527
2018	37,961.74	31,318	31,288	6,674	1.75	3,814
2019	59,179.07	42,905	42,863	16,316	2.75	5,933
2020	596,972.41	373,108	372,746	224,226	3.75	59,794
2022	2,595,559.42	1,103,113	1,102,041	1,493,518	5.75	259,742
2024	143,256.33	32,233	32,202	111,054	7.75	14,330
	24,487,946.38	22,595,671	22,593,631	1,894,315		386,140

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 4.90 1.58

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 325.4 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-R4						
NET SALVAGE PERCENT: 0						
1941	680.02	644	680			
1943	5.96	6	6			
1951	51.30	47	51			
1952	22.17	20	22			
1953	279.62	252	280			
1961	1,208.46	1,025	1,208			
1963	368.77	306	369			
1965	505.58	412	503	3		
1966	1,747.21	1,400	1,708	39	13.00	3
1967	3,400.58	2,700	3,295	106	15.14	7
1970	6.79	5	6	1		
1975	1,087.22	775	946	141	20.14	7
1977	7.87	5	6	2		
1980	13,678.80	8,984	10,962	2,717	24.26	112
1986	738.49	431	526	212	30.29	7
1988	26.90	15	18	9		
1989	1,250.39	680	830	420	32.31	13
1990	18,763.61	9,999	12,201	6,563	31.71	207
1991	2,099.43	1,088	1,328	771	32.13	24
2000	80.65	32	39	42	42.00	1
2012	2,820.91	607	741	2,080	52.00	40
2026	6,175.80	70	85	6,091	64.80	94
	55,006.53	29,503	35,810	19,197		515

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 37.30 0.94

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 328 MEASURING AND REGULATING STATION STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 30-L2.5						
NET SALVAGE PERCENT: 0						
1941	114.35	114	114			
1955	63.97	62	64			
1963	348.24	328	348			
1964	590.86	555	591			
1965	2,944.99	2,760	2,945			
1966	1,108.80	1,042	1,109			
1967	58.76	55	59			
1969	530.43	492	530			
1974	774.97	705	775			
1978	1,189.60	1,062	1,190			
1985	165.32	141	164	1		
1994	2,004.51	1,584	1,843	162	8.53	19
2026	1,182.60	35	41	1,142	24.30	47
	11,077.40	8,935	9,773	1,304		66

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 19.80 0.60

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 329 OTHER STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 40-SQUARE						
NET SALVAGE PERCENT: 0						
2004	2,597.88	1,445	1,397	1,201	17.66	68
2026	306.60	6	6	301	37.63	8
	2,904.48	1,451	1,403	1,501		76

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 19.80 2.62

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 332 FIELD LINES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 50-R1.5						
NET SALVAGE PERCENT: 0						
1961	648.85	567	486	163	9.59	17
1962	43,251.09	37,516	32,154	11,097	9.82	1,130
1965	6,175.75	5,258	4,507	1,669	10.70	156
1966	3,351.65	2,847	2,440	912	10.73	85
1967	10,279.70	8,649	7,413	2,867	11.16	257
1968	25.56	21	18	8	8.00	1
1973	18,387.82	14,688	12,589	5,799	13.42	432
1983	3,581.52	2,556	2,191	1,391	17.39	80
1985	905.72	631	541	365	18.25	20
1986	14,714.78	10,068	8,629	6,086	18.55	328
1993	75,667.63	45,794	39,249	36,419	21.69	1,679
2009	23,829.24	8,798	7,541	16,288	29.45	553
2010	9,437.36	3,328	2,852	6,585	29.80	221
2015	221,526.81	57,818	49,554	171,973	31.85	5,399
2018	3,956.67	800	686	3,271	32.71	100
2026	52,034.40	1,316	1,128	50,906	28.92	1,760
	487,774.55	200,655	171,978	315,797		12,218

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 25.80 2.50

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 334 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 32-O1						
NET SALVAGE PERCENT: 0						
1958	1,773.37	1,773	1,773			
1964	321.03	316	321			
1965	4,162.16	4,079	4,162			
1966	5,080.72	4,928	5,081			
1967	4,492.37	4,312	4,492			
1969	468.00	442	468			
1971	110.08	102	110			
1973	430.61	392	431			
1974	98.31	89	98			
1975	555.84	496	556			
1976	12,897.95	11,407	12,898			
1977	4,452.52	3,903	4,453			
1978	28,880.00	24,944	28,880			
1979	55,756.22	47,683	55,756			
1980	14,667.51	12,415	14,587	81	8.10	10
1981	16,303.74	13,648	16,035	269	8.68	31
1982	28,034.88	23,199	27,257	778	9.26	84
1983	25,812.23	21,099	24,790	1,022	9.64	106
1984	19,645.86	15,854	18,627	1,019	10.09	101
1985	62,288.16	49,588	58,262	4,026	10.57	381
1986	31,733.99	24,908	29,265	2,469	11.02	224
1987	59,760.62	46,446	54,570	5,191	11.26	461
1988	42,251.60	32,322	37,976	4,276	11.75	364
1989	50,401.58	37,922	44,555	5,847	12.26	477
1990	24,455.57	18,173	21,352	3,104	12.52	248
1991	50,330.61	36,726	43,150	7,181	13.06	550
1992	18,116.88	13,030	15,309	2,808	13.37	210
1993	38,336.76	27,150	31,899	6,438	13.70	470
1994	39,622.83	27,601	32,429	7,194	14.05	512
1995	20,415.63	13,972	16,416	4,000	14.39	278
1996	2,187.27	1,469	1,726	461	14.87	31
1997	5,458.52	3,592	4,220	1,239	15.11	82
1998	615.29	398	468	147	14.70	10
1999	12,783.25	8,082	9,496	3,287	15.88	207
2000	586.47	363	426	160	16.00	10
2001	71,468.88	43,310	50,886	20,583	16.41	1,254
2002	82,475.43	48,801	57,337	25,138	16.73	1,503
2003	53,077.65	30,727	36,102	16,976	16.91	1,004
2004	53,541.21	30,138	35,410	18,131	17.28	1,049
2005	81,837.57	44,863	52,710	29,128	17.50	1,664
2006	67,979.67	36,206	42,539	25,441	17.77	1,432
2007	139,172.95	72,064	84,669	54,504	17.93	3,040
2008	83,652.52	41,826	49,142	34,511	18.25	1,891
2009	42,217.47	20,463	24,042	18,175	18.34	991
2010	39,926.74	18,622	21,879	18,048	18.59	971
2011	258,785.09	116,039	136,337	122,448	18.76	6,527
2012	81,166.04	34,934	41,045	40,121	18.86	2,127
2013	211,266.49	86,788	101,969	109,297	19.01	5,749
2014	80,512.06	31,561	37,082	43,430	19.00	2,286
2015	47,758.85	17,728	20,829	26,930	19.05	1,414
2016	84,481.05	29,526	34,691	49,790	19.08	2,610
2017	166,318.50	54,303	63,801	102,518	19.08	5,373
2018	108,477.14	32,934	38,695	69,782	18.92	3,688

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 334 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 32-O1						
NET SALVAGE PERCENT: 0						
2019	90,373.43	25,160	29,561	60,812	18.79	3,236
2020	179,947.65	45,329	53,258	126,690	18.56	6,826
2021	95,679.12	21,394	25,136	70,543	18.23	3,870
2022	20,446.68	3,954	4,646	15,801	17.73	891
2023	99,847.60	15,966	18,758	81,090	17.08	4,748
2024	402.60	49	58	345	16.43	21
2025	286,381.29	22,739	26,716	259,665	14.50	17,908
2026	378,300.60	20,542	24,135	354,166	13.06	27,118
	3,588,782.71	1,478,789	1,733,727	1,855,056		114,038

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 16.30 3.18

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 365.2 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 80-R4						
NET SALVAGE PERCENT: 0						
1916	2,393.30	2,348	2,393			
1917	11.67	11	12			
1918	380.29	370	380			
1919	21.05	21	21			
1920	2,025.05	1,958	2,025			
1921	82.62	80	83			
1922	97.11	94	97			
1923	112.63	108	113			
1924	27.71	27	28			
1925	89.05	85	89			
1926	326.01	310	326			
1927	0.62	1	1			
1928	1,295.69	1,235	1,296			
1929	561.19	529	561			
1930	527.90	498	528			
1931	44.62	42	45			
1932	358.44	334	356	2		
1933	39.06	36	38	1		
1934	723.71	674	719	5	5.00	1
1935	37.31	35	37			
1936	287.11	264	282	5	5.00	1
1937	83.48	77	82	1		
1938	322.12	296	316	6	6.00	1
1939	24.40	22	23	1		
1940	69.56	63	67	3		
1941	841.81	761	812	30	10.00	3
1942	270.64	244	260	11	11.00	1
1943	1,070.78	963	1,027	44	8.80	5
1944	50.15	45	48	2		
1945	16.65	15	16	1		
1946	363.83	321	342	22	11.00	2
1947	29.01	25	27	2		
1948	758.84	659	703	56	11.20	5
1949	64.74	56	60	5		
1950	322.04	275	293	29	14.50	2
1951	145.65	124	132	14	14.00	1
1952	224.68	190	203	22	11.00	2
1953	481.84	402	429	53	13.25	4
1954	505.55	420	448	58	14.50	4
1955	665.83	546	582	84	16.80	5
1956	16,425.52	13,385	14,276	2,150	15.93	135
1957	7,673.99	6,165	6,575	1,099	16.91	65
1958	36.17	29	31	5		
1959	771.07	607	647	124	17.71	7
1960	295.37	231	246	49	16.33	3
1961	5,781.83	4,452	4,748	1,034	19.51	53
1962	1,206.27	922	983	223	20.27	11
1963	1,850.70	1,405	1,499	352	19.56	18
1964	2,465.49	1,842	1,965	500	20.83	24
1965	21,336.98	15,813	16,865	4,472	21.40	209
1966	7,455.60	5,435	5,797	1,659	22.42	74
1967	18,919.37	13,563	14,466	4,453	23.44	190
1968	1,065.20	757	807	258	23.45	11

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 365.2 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 80-R4						
NET SALVAGE PERCENT: 0						
1969	5,286.91	3,692	3,938	1,349	24.53	55
1970	152.38	105	112	40	20.00	2
1971	8,901.79	6,050	6,453	2,449	26.05	94
1972	795.13	535	571	224	28.00	8
1973	1,224.15	808	862	362	27.85	13
1974	2,753.73	1,798	1,918	836	27.87	30
1975	2,662.21	1,705	1,818	844	29.10	29
1976	69.67	44	47	23	23.00	1
1977	2,679.70	1,663	1,774	906	30.20	30
1978	9,938.12	6,042	6,444	3,494	31.20	112
1979	2,349.25	1,399	1,492	857	31.74	27
1980	6,771.37	3,978	4,243	2,528	32.41	78
1981	22,428.95	12,890	13,748	8,681	33.52	259
1982	8,083.37	4,543	4,845	3,238	34.45	94
1983	5,173.98	2,864	3,055	2,119	34.74	61
1984	19,225.47	10,397	11,089	8,136	35.84	227
1985	3,098.54	1,636	1,745	1,354	36.59	37
1986	18,824.29	9,774	10,425	8,399	37.33	225
1987	27,984.31	14,168	15,111	12,873	38.31	336
1988	168,970.31	83,370	88,919	80,051	39.28	2,038
1989	4,475.83	2,151	2,294	2,182	40.41	54
1990	34,189.80	16,110	17,182	17,008	40.69	418
1991	125,403.09	57,460	61,284	64,119	41.69	1,538
1992	32,062.80	14,274	15,224	16,839	42.63	395
1993	40,067.55	17,317	18,470	21,598	43.72	494
1994	2,725.75	1,143	1,219	1,507	44.32	34
1995	14,954.84	6,123	6,531	8,424	45.05	187
1996	18,210.07	7,217	7,697	10,513	46.11	228
1997	35,067.47	13,438	14,332	20,735	47.13	440
1998	4,197.54	1,554	1,657	2,541	47.94	53
1999	104,761.18	37,400	39,889	64,872	49.07	1,322
2000	726.12	250	267	459	51.00	9
2001	12,921.63	4,274	4,558	8,364	51.00	164
2002	26,465.23	8,472	9,036	17,429	51.57	338
2003	55,616.52	17,069	18,205	37,412	52.54	712
2004	8,196.98	2,407	2,567	5,630	53.62	105
2005	1,673.81	470	501	1,173	53.32	22
2006	1,921.60	514	548	1,374	54.96	25
2007	69,723.92	17,717	18,896	50,828	56.54	899
2008	3,432.77	827	882	2,551	57.98	44
2009	138,500.77	31,537	33,636	104,865	58.52	1,792
2010	37,295.25	8,000	8,533	28,762	59.55	483
2011	21,236.64	4,275	4,560	16,677	60.42	276
2012	13,184.88	2,480	2,645	10,540	61.64	171
2013	30,483.25	5,332	5,687	24,796	62.46	397
2014	117,074.81	18,931	20,191	96,884	63.53	1,525
2015	26,207.01	3,921	4,182	22,025	64.03	344
2016	197,002.64	26,851	28,638	168,365	64.93	2,593
2017	14,628.21	1,799	1,919	12,709	65.85	193
2018	7,388.54	811	865	6,524	67.26	97
2019	351,604.41	33,895	36,151	315,453	67.94	4,643
2020	106,196.48	8,825	9,412	96,784	68.93	1,404
2021	184,275.33	12,862	13,718	170,557	69.93	2,439
2022	11,207.83	633	675	10,533	71.17	148
2023	20,574.78	889	948	19,627	71.89	273

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 365.2 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 80-R4						
NET SALVAGE PERCENT: 0						
2024	10,338.92	309	330	10,009	73.06	137
2025	135,008.01	2,241	2,390	132,618	73.92	1,794
2026	404,837.88	4,048	4,318	400,520	74.45	5,380
	2,842,251.07	640,457	682,851	2,159,400		36,163

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 59.70 1.27

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 366.2 MEASURING AND REGULATING STATION STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 60-R2						
NET SALVAGE PERCENT: 0						
1916	555.31	555	555			
1919	238.85	236	226	13	1.44	9
1920	138.73	137	131	8	1.33	6
1922	40.62	40	38	3	3.00	1
1925	1,064.24	1,034	989	75	2.88	26
1926	475.39	462	442	33	2.75	12
1931	309.24	295	282	27	4.50	6
1933	341.73	325	311	31	5.17	6
1934	596.86	567	542	55	5.00	11
1935	1,359.92	1,291	1,234	126	4.85	26
1936	682.78	641	613	70	5.83	12
1937	478.20	448	428	50	6.25	8
1938	302.82	283	271	32	6.40	5
1940	271.61	253	242	30	6.00	5
1941	34.13	31	30	4	4.00	1
1942	45.97	42	40	6	6.00	1
1945	64.37	59	56	8	8.00	1
1946	334.45	303	290	44	8.80	5
1948	393.24	354	338	55	9.17	6
1949	399.74	358	342	58	9.67	6
1950	384.58	343	328	57	9.50	6
1951	227.04	202	193	34	8.50	4
1952	1,471.29	1,300	1,243	228	9.91	23
1953	248.62	219	209	40	10.00	4
1954	4,386.38	3,835	3,666	720	10.43	69
1955	1,454.73	1,264	1,208	247	10.74	23
1956	8,105.55	7,004	6,696	1,410	11.02	128
1957	5,170.33	4,440	4,245	925	11.42	81
1958	2,731.83	2,331	2,229	503	11.70	43
1959	1,204.65	1,021	976	229	12.05	19
1960	4,915.29	4,136	3,954	961	12.48	77
1962	4,159.57	3,447	3,296	864	13.29	65
1963	1,639.84	1,348	1,289	351	13.50	26
1965	10,174.19	8,226	7,864	2,310	14.53	159
1966	9,231.05	7,397	7,072	2,159	14.89	145
1967	6,731.16	5,345	5,110	1,621	15.44	105
1970	1,181.76	911	871	311	16.37	19
1971	2,092.94	1,596	1,526	567	17.18	33
1972	4,268.37	3,219	3,078	1,190	17.76	67
1973	1,990.67	1,484	1,419	572	18.45	31
1974	612.53	451	431	182	18.20	10
1976	1,576.73	1,141	1,091	486	19.44	25
1977	4,926.25	3,518	3,363	1,563	19.78	79
1984	4,876.95	3,152	3,013	1,864	23.01	81
1985	4,872.39	3,095	2,959	1,913	23.62	81
1986	800.42	499	477	323	24.85	13
1987	1,464.02	896	857	607	25.29	24
1988	30,904.22	18,558	17,742	13,162	25.46	517
1991	10,611.42	6,022	5,757	4,854	26.82	181
1999	9,229.98	4,275	4,087	5,143	31.55	163
2000	1,304.63	589	563	742	32.26	23
2003	345.30	141	135	210	35.00	6
2006	2,304.48	840	803	1,501	34.91	43

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 366.2 MEASURING AND REGULATING STATION STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 60-R2						
NET SALVAGE PERCENT: 0						
2012	9,977.57	2,687	2,569	7,409	38.59	192
2013	14,908.03	3,773	3,608	11,300	39.10	289
2014	2,906.85	687	657	2,250	39.47	57
2015	13,514.88	2,965	2,835	10,680	40.00	267
2016	7,709.85	1,557	1,488	6,222	40.40	154
2017	5,141.73	947	905	4,237	41.14	103
2019	4,173.92	617	590	3,584	41.67	86
2021	2,181.39	240	230	1,951	42.41	46
2026	37,043.99	682	652	36,392	40.08	908
	251,285.57	124,114	118,684	132,602		4,628

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 28.70 1.84

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 366.3 OTHER STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 60-R2						
NET SALVAGE PERCENT: 0						
1916	14.09	14	14			
1931	34.34	33	34			
1933	254.88	242	255			
1937	124.46	117	124			
1947	192.29	174	192			
1949	178.61	160	179			
1955	582.91	507	583			
1965	842.80	681	843			
1979	1,534.38	1,066	1,339	195	21.67	9
2026	1,323.00	24	30	1,293	40.41	32
	5,081.76	3,018	3,593	1,489		41

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 36.30 0.81

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 367.1 MAINS - EXCLUDING CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-R2						
NET SALVAGE PERCENT: 0						
1916	36,350.05	34,867	36,350			
1918	3.65	3	3	1		
1919	11,108.31	10,484	11,108			
1922	13.38	13	13			
1923	12.64	12	13			
1925	23.86	22	24			
1928	5,863.31	5,415	5,863			
1929	1,722.08	1,574	1,722			
1930	13.40	12	13			
1931	12,633.62	11,552	12,634			
1932	3,287.78	2,975	3,266	22	11.00	2
1933	65.77	59	65	1		
1934	1,761.68	1,593	1,749	13	13.00	1
1935	3,078.94	2,753	3,022	57	11.40	5
1936	15,258.51	13,633	14,968	291	10.78	27
1937	1,997.14	1,782	1,956	41	10.25	4
1938	236.47	209	229	7	7.00	1
1939	51.23	45	49	2		
1940	116.66	103	113	4		
1941	2,039.90	1,791	1,966	74	12.33	6
1942	89.17	77	85	4		
1943	87,074.39	75,389	82,769	4,305	12.89	334
1944	74.07	64	70	4		
1945	118.42	102	112	6		
1947	61,981.15	52,560	57,705	4,276	14.21	301
1948	4,460.36	3,769	4,138	322	14.64	22
1949	328.02	276	303	25	12.50	2
1950	10.36	9	10			
1951	222.19	184	202	20	20.00	1
1952	11,939.38	9,840	10,803	1,136	15.78	72
1953	286,794.36	235,286	258,318	28,476	16.04	1,775
1954	52,065.04	42,131	46,255	5,810	17.04	341
1955	227,144.66	182,874	200,775	26,370	17.25	1,529
1956	559,686.95	448,197	492,070	67,617	17.47	3,870
1957	94,458.01	75,226	82,590	11,868	17.69	671
1958	6,627.21	5,202	5,711	916	18.69	49
1959	135,290.78	105,540	115,871	19,420	18.96	1,024
1960	13,627.90	10,563	11,597	2,031	19.16	106
1961	121,977.92	93,923	103,117	18,861	19.48	968
1962	455.89	349	383	73	18.25	4
1963	129,244.36	97,282	106,805	22,439	20.78	1,080
1964	185,349.14	138,456	152,009	33,340	21.07	1,582
1965	527,367.71	390,832	429,090	98,278	21.40	4,592
1966	170,748.14	125,500	137,785	32,963	21.71	1,518
1967	593,505.95	432,547	474,888	118,618	22.05	5,380
1968	48,469.12	34,728	38,127	10,342	23.03	449
1969	195,100.38	138,502	152,060	43,040	23.40	1,839
1970	80,687.81	56,732	62,285	18,403	23.75	775
1971	13,273.55	9,241	10,146	3,128	24.06	130
1972	166,088.55	114,435	125,637	40,452	24.49	1,652
1973	590,069.53	399,064	438,128	151,942	25.49	5,961
1974	3,562.72	2,383	2,616	947	25.59	37
1975	140,271.94	92,734	101,812	38,460	26.27	1,464

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 367.1 MAINS - EXCLUDING CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-R2						
NET SALVAGE PERCENT: 0						
1976	144,658.82	94,491	103,741	40,918	26.67	1,534
1977	183,111.02	118,143	129,708	53,403	27.08	1,972
1978	5,649.33	3,598	3,950	1,699	27.40	62
1979	42,693.76	26,628	29,235	13,459	28.51	472
1980	75,019.19	46,144	50,661	24,358	28.93	842
1981	216,787.44	131,460	144,328	72,459	29.37	2,467
1982	176,035.42	105,164	115,458	60,577	29.83	2,031
1983	585,627.42	344,466	378,185	207,442	30.28	6,851
1984	292,104.21	169,070	185,620	106,484	30.74	3,464
1985	581,240.35	330,842	363,227	218,013	31.22	6,983
1986	614,454.76	341,268	374,674	239,781	32.22	7,442
1987	693,254.81	378,240	415,265	277,990	32.69	8,504
1988	3,660,860.81	1,960,391	2,152,290	1,508,571	33.18	45,466
1989	2,553,293.62	1,340,990	1,472,257	1,081,037	33.67	32,107
1990	2,835,791.79	1,459,866	1,602,769	1,233,023	34.17	36,085
1991	1,285,025.93	647,782	711,192	573,834	34.68	16,547
1992	1,736,831.75	856,605	940,456	796,376	35.19	22,631
1993	432,014.56	208,274	228,661	203,354	35.72	5,693
1994	660,306.75	310,872	341,303	319,004	36.25	8,800
1995	299,966.22	136,845	150,240	149,726	37.25	4,019
1996	549,967.59	244,571	268,512	281,456	37.78	7,450
1997	269,084.95	116,487	127,890	141,195	38.32	3,685
1998	494,278.99	208,042	228,407	265,872	38.87	6,840
1999	358,670.92	146,625	160,978	197,693	39.41	5,016
2001	70,964.44	27,236	29,902	41,062	40.54	1,013
2002	168,572.62	62,540	68,662	99,911	41.12	2,430
2003	119,561.82	42,803	46,993	72,569	41.68	1,741
2004	271,450.74	94,221	103,444	168,007	41.84	4,015
2005	85,464.63	28,511	31,302	54,163	42.45	1,276
2006	165,167.83	52,854	58,028	107,140	43.05	2,489
2007	1,355,557.76	414,936	455,553	900,005	43.64	20,623
2008	185,261.50	54,096	59,391	125,870	44.24	2,845
2009	239,479.23	66,503	73,013	166,466	44.86	3,711
2010	178,953.88	47,405	52,045	126,909	45.10	2,814
2011	518,933.23	129,785	142,489	376,444	45.73	8,232
2012	496,765.87	116,790	128,222	368,544	46.36	7,950
2013	382,446.82	84,635	92,920	289,527	46.63	6,209
2014	2,380,236.68	489,853	537,804	1,842,433	47.27	38,977
2015	1,630,580.44	311,767	342,285	1,288,295	47.58	27,076
2016	666,446.40	117,495	128,996	537,450	47.89	11,223
2017	2,653,731.83	424,597	466,160	2,187,572	48.55	45,058
2018	2,226,550.31	321,514	352,986	1,873,564	48.89	38,322
2019	8,564,018.19	1,104,758	1,212,901	7,351,117	48.93	150,237
2020	2,801,728.61	315,194	346,048	2,455,681	49.31	49,801
2021	5,414,552.04	520,338	571,273	4,843,279	49.39	98,062
2022	929,535.76	73,433	80,621	848,915	49.52	17,143
2024	6,904,949.68	303,127	332,799	6,572,151	49.03	134,043
2025	380,893.66	9,713	10,664	370,230	47.77	7,750
2026	10,349,561.27	164,558	180,666	10,168,895	46.42	219,063
	72,491,899.16	18,568,420	20,383,572	52,108,327		1,176,640

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 44.30 1.62

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 367.2 MAINS - CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 27-S2.5						
NET SALVAGE PERCENT: 0						
1965	323.93	324	324			
1966	1,149.15	1,149	1,149			
1968	5,216.00	5,216	5,216			
1969	1,402.49	1,402	1,402			
1973	1,074.19	1,074	1,074			
1975	58,414.30	58,075	58,414			
1976	1,496.82	1,482	1,497			
1977	12,507.78	12,320	12,508			
1981	2,725.14	2,639	2,725			
1983	76,642.47	73,592	76,642			
1984	8,703.96	8,311	8,704			
1985	91,031.66	86,371	90,550	482	2.23	216
1986	592.79	558	585	8	2.67	3
1987	6,401.51	6,005	6,296	106	2.59	41
1988	58,050.91	54,179	56,800	1,251	2.73	458
1989	958.49	885	928	30	3.00	10
1992	1,450.20	1,311	1,374	76	3.62	21
1993	5,238.23	4,703	4,931	307	3.79	81
1996	4,634.40	4,024	4,219	415	4.61	90
1998	465,248.37	392,995	412,009	53,239	5.19	10,258
1999	172,433.45	143,775	150,731	21,702	5.43	3,997
2001	407,582.08	328,307	344,191	63,391	6.10	10,392
2003	141,224.08	109,011	114,285	26,939	6.87	3,921
2004	314,255.80	236,320	247,754	66,502	7.34	9,060
2005	108,425.83	79,487	83,333	25,093	7.74	3,242
2006	48,232.68	34,284	35,943	12,290	8.24	1,492
2011	120,767.04	69,984	73,370	47,397	11.07	4,282
2013	46,251.70	23,838	24,991	21,261	12.46	1,706
2014	44,697.65	21,517	22,558	22,140	13.20	1,677
2015	269,661.97	120,134	125,946	143,716	14.00	10,265
2016	10,395.47	4,252	4,458	5,937	14.81	401
2017	2,883.35	1,072	1,124	1,759	15.57	113
2018	196,914.66	65,632	68,807	128,108	16.50	7,764
2019	33,464.53	9,852	10,329	23,136	17.38	1,331
2020	249,567.19	63,490	66,562	183,005	18.32	9,989
2021	209,997.34	44,981	47,157	162,840	19.26	8,455
2022	310,547.58	53,849	56,454	254,094	20.26	12,542
2023	209,143.59	27,795	29,140	180,004	21.20	8,491
2024	11,262.63	1,036	1,086	10,177	22.22	458
2025	28,369.47	1,450	1,520	26,849	23.21	1,157
2026	1,149,951.25	35,304	37,012	1,112,939	23.70	46,959
	4,889,292.14	2,191,985	2,294,098	2,595,194		158,872

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 16.30 3.25

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 369 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
1980 AND PRIOR						
SURVIVOR CURVE: IOWA 30-R0.5						
NET SALVAGE PERCENT: 0						
1964	1,572.50	1,572	1,573			
1965	22,538.91	22,539	22,539			
1966	5,738.51	5,735	5,739			
1967	24,567.68	24,265	24,568			
1968	18,047.31	17,530	18,047			
1969	7,836.85	7,487	7,837			
1970	7,611.18	7,152	7,611			
1971	2,450.39	2,265	2,450			
1972	7,119.85	6,474	7,120			
1973	33,509.44	29,991	33,509			
1974	12,832.32	11,301	12,832			
1975	12,607.71	10,931	12,608			
1976	20,839.36	17,783	20,839			
1977	23,497.79	19,738	23,498			
1978	28,491.29	23,553	28,491			
1979	15,639.89	12,720	15,640			
1980	14,467.59	11,574	14,468			
	259,368.57	232,610	259,369			
1981 AND SUBSEQUENT						
SURVIVOR CURVE: IOWA 40-R1.5						
NET SALVAGE PERCENT: 0						
1981	16,557.42	12,182	16,557			
1982	21,295.92	15,450	21,296			
1983	47,820.69	34,192	47,821			
1984	39,052.22	27,493	39,052			
1985	41,067.85	28,460	41,068			
1986	271,507.02	185,032	271,507			
1987	106,065.42	71,037	106,065			
1988	427,961.20	281,384	421,649	6,312	13.69	461
1989	306,079.91	197,422	295,833	10,247	14.19	722
1990	177,198.19	112,034	167,881	9,317	14.72	633
1991	102,872.93	63,678	95,420	7,453	15.24	489
1992	126,702.55	76,750	115,009	11,694	15.76	742
1993	276,005.45	163,326	244,741	31,264	16.33	1,915
1994	119,342.52	68,950	103,320	16,022	16.88	949
1995	463,092.26	260,952	391,032	72,060	17.46	4,127
1996	61,025.80	33,488	50,181	10,845	18.04	601
1997	150,233.16	80,187	120,159	30,074	18.64	1,613
1998	109,484.83	56,768	85,066	24,419	19.26	1,268
1999	133,808.03	67,305	100,855	32,953	19.88	1,658
2000	7,407.51	3,609	5,408	1,999	20.61	97
2001	164,138.87	77,309	115,846	48,293	21.16	2,282
2002	126,501.81	57,527	86,203	40,299	21.81	1,848
2003	15,273.43	6,694	10,031	5,243	22.50	233
2004	12,706.71	5,353	8,021	4,685	23.19	202
2005	13,068.42	5,283	7,916	5,152	23.85	216
2006	7,029.06	2,720	4,076	2,953	24.61	120
2007	58,130.39	21,479	32,186	25,944	25.21	1,029
2008	56,604.67	19,911	29,836	26,768	25.94	1,032

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 369 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
1981 AND SUBSEQUENT						
SURVIVOR CURVE: IOWA 40-R1.5						
NET SALVAGE PERCENT: 0						
2009	131,156.37	43,806	65,643	65,514	26.64	2,459
2010	190,345.29	60,149	90,132	100,213	27.36	3,663
2011	103,432.05	30,771	46,110	57,322	28.10	2,040
2012	41,430.89	11,570	17,337	24,093	28.82	836
2013	870,654.18	226,805	339,863	530,791	29.58	17,944
2014	34,994.72	8,460	12,677	22,318	30.32	736
2015	446,071.97	99,474	149,060	297,012	31.08	9,556
2016	332,022.38	67,650	101,372	230,650	31.85	7,242
2017	59,998.47	11,085	16,611	43,388	32.60	1,331
2018	118,762.33	19,625	29,408	89,355	33.39	2,676
2019	44,425.39	6,475	9,703	34,723	34.18	1,016
2020	573,654.45	72,424	108,526	465,128	34.95	13,308
2021	408,481.39	43,401	65,036	343,446	35.75	9,607
2022	224,133.58	19,388	29,053	195,081	36.54	5,339
2023	20,805.42	1,378	2,065	18,741	37.33	502
2024	11,887.69	547	820	11,068	38.17	290
2025	148,855.87	3,833	5,744	143,112	38.97	3,672
2026	1,284,632.61	19,912	29,838	1,254,795	39.38	31,864
	8,503,779.29	2,782,728	4,153,033	4,350,746		136,318
	8,763,147.86	3,015,338	4,412,402	4,350,746		136,318

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 31.90 1.56

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 374.2 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 80-R4						
NET SALVAGE PERCENT: 0						
1931	9.22	9	9			
1932	39.93	37	39	1		
1933	177.40	165	172	5	5.00	1
1934	293.95	274	285	9	9.00	1
1935	1,167.33	1,087	1,132	35	7.00	5
1936	961.48	885	922	39	7.80	5
1937	1,136.29	1,045	1,089	47	7.83	6
1938	1,506.21	1,382	1,440	66	8.25	8
1939	1,557.31	1,427	1,486	71	7.89	9
1940	1,566.22	1,418	1,477	89	8.90	10
1941	1,388.54	1,255	1,307	82	9.11	9
1942	593.37	535	557	36	9.00	4
1943	258.80	233	243	16	8.00	2
1944	344.13	306	319	25	12.50	2
1945	316.80	281	293	24	12.00	2
1946	642.44	567	591	51	10.20	5
1947	1,288.08	1,123	1,170	118	11.80	10
1948	1,315.16	1,142	1,190	125	11.36	11
1949	4,047.59	3,502	3,648	400	12.12	33
1950	3,892.40	3,324	3,462	430	13.03	33
1951	3,086.50	2,624	2,733	354	13.11	27
1952	2,417.83	2,046	2,131	287	13.67	21
1953	3,207.59	2,678	2,790	418	14.41	29
1954	2,824.51	2,347	2,445	380	14.62	26
1955	17,217.28	14,108	14,695	2,522	15.66	161
1956	17,721.13	14,441	15,042	2,679	15.95	168
1957	13,695.54	11,002	11,460	2,236	16.94	132
1958	13,892.83	11,093	11,555	2,338	17.19	136
1959	9,724.99	7,652	7,971	1,754	18.27	96
1960	12,684.89	9,917	10,330	2,355	18.54	127
1961	15,751.33	12,129	12,634	3,117	19.48	160
1962	17,980.68	13,748	14,320	3,661	19.79	185
1963	12,592.35	9,558	9,956	2,636	20.12	131
1964	14,089.47	10,525	10,963	3,126	21.12	148
1965	17,186.53	12,737	13,267	3,920	21.42	183
1966	19,437.75	14,170	14,760	4,678	22.38	209
1967	20,097.51	14,408	15,008	5,090	23.35	218
1968	28,540.76	20,281	21,126	7,415	23.69	313
1969	13,806.65	9,643	10,045	3,762	24.75	152
1970	20,834.64	14,415	15,015	5,820	25.09	232
1971	39,324.33	26,725	27,838	11,486	26.05	441
1972	12,822.37	8,626	8,985	3,837	26.46	145
1973	25,625.75	16,921	17,626	8,000	27.40	292
1974	11,911.25	7,779	8,103	3,808	27.80	137
1975	5,793.17	3,711	3,866	1,927	28.76	67
1976	10,792.97	6,779	7,061	3,732	29.86	125
1977	13,293.82	8,250	8,594	4,700	30.13	156
1978	29,889.19	18,173	18,930	10,959	31.13	352
1979	37,480.79	22,316	23,245	14,236	32.14	443
1980	44,554.77	26,171	27,261	17,294	32.51	532
1981	65,955.70	37,905	39,483	26,473	33.51	790
1982	48,312.72	27,152	28,283	20,030	34.48	581
1983	59,226.64	32,788	34,153	25,074	34.87	719

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 374.2 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 80-R4						
NET SALVAGE PERCENT: 0						
1984	55,991.06	30,280	31,541	24,450	35.90	681
1985	109,213.57	57,665	60,066	49,148	36.87	1,333
1986	83,159.37	43,176	44,974	38,185	37.25	1,025
1987	114,781.01	58,114	60,534	54,247	38.28	1,417
1988	128,304.99	63,306	65,942	62,363	39.27	1,588
1989	139,919.92	67,232	70,032	69,888	40.28	1,735
1990	197,733.42	93,172	97,052	100,681	40.68	2,475
1991	190,686.39	87,373	91,011	99,675	41.69	2,391
1992	152,415.21	67,855	70,681	81,734	42.68	1,915
1993	206,508.01	89,253	92,970	113,538	43.69	2,599
1994	212,517.37	89,087	92,797	119,720	44.69	2,679
1995	200,641.27	82,143	85,563	115,078	45.08	2,553
1996	242,453.13	96,084	100,085	142,368	46.07	3,090
1997	253,081.47	96,981	101,019	152,062	47.08	3,230
1998	191,697.80	70,947	73,901	117,797	48.08	2,450
1999	208,672.98	74,496	77,598	131,075	49.07	2,671
2000	218,967.45	75,303	78,439	140,528	50.08	2,806
2001	275,749.86	91,218	95,016	180,734	51.08	3,538
2002	181,207.50	58,005	60,420	120,788	51.51	2,345
2003	212,217.23	65,129	67,841	144,376	52.52	2,749
2004	294,048.33	86,362	89,958	204,090	53.51	3,814
2005	282,054.43	79,116	82,410	199,644	54.50	3,663
2006	212,833.89	56,890	59,259	153,575	55.50	2,767
2007	276,941.65	70,371	73,301	203,641	56.50	3,604
2008	260,874.68	62,845	65,462	195,413	57.51	3,398
2009	223,519.35	50,895	53,014	170,505	58.51	2,914
2010	269,514.91	57,811	60,218	209,297	59.51	3,517
2011	303,891.77	61,173	63,720	240,172	60.51	3,969
2012	276,057.20	51,926	54,088	221,969	61.50	3,609
2013	330,050.40	57,726	60,130	269,920	62.51	4,318
2014	431,212.70	69,727	72,631	358,582	63.51	5,646
2015	466,493.54	69,787	72,693	393,801	63.94	6,159
2016	452,869.31	61,726	64,296	388,573	64.94	5,984
2017	464,965.88	57,191	59,573	405,393	65.94	6,148
2018	518,876.63	56,921	59,291	459,586	66.94	6,866
2019	1,176,906.50	113,454	118,179	1,058,728	67.94	15,583
2020	657,565.65	54,644	56,920	600,646	68.94	8,713
2021	573,923.42	40,060	41,728	532,195	69.94	7,609
2022	671,441.30	37,936	39,516	631,925	70.94	8,908
2023	608,584.31	26,291	27,386	581,198	71.94	8,079
2024	746,480.54	22,320	23,249	723,232	72.94	9,915
2025	1,246,662.65	20,695	21,557	1,225,106	73.94	16,569
2026	997,180.71	9,972	10,387	986,794	74.44	13,256
	16,023,145.64	3,205,473	3,338,953	12,684,193		208,068

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 61.00 1.30

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 375.3 STRUCTURES AND IMPROVEMENTS - LARGE
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
ELK SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2040						
NET SALVAGE PERCENT: 0						
1970	101,615.79	78,892	91,191	10,425	11.74	888
1972	872.15	673	778	94	11.75	8
1975	397.62	303	350	47	11.75	4
1980	5,938.40	4,441	5,133	805	12.20	66
1981	866.58	645	746	121	12.10	10
1988	944.53	677	783	162	12.46	13
1990	7,780.00	5,505	6,363	1,417	12.43	114
1992	7,147.93	4,983	5,760	1,388	12.50	111
1993	12,411.95	8,584	9,922	2,490	12.51	199
1996	2,932.90	1,976	2,284	649	12.48	52
1997	91,997.01	61,347	70,911	21,086	12.63	1,670
1999	81.08	53	61	20	10.00	2
2000	6,956.95	4,486	5,185	1,772	12.75	139
2004	3,780.97	2,303	2,662	1,119	12.86	87
2005	80,474.20	48,189	55,702	24,773	12.85	1,928
2006	3,790.93	2,230	2,578	1,213	12.90	94
2008	8,450.00	4,766	5,509	2,941	12.96	227
2010	31,121.00	16,705	19,309	11,812	12.98	910
2011	12,389.14	6,461	7,468	4,921	13.02	378
2014	33,265.48	15,601	18,033	15,232	13.09	1,164
2015	10,797.30	4,840	5,595	5,203	13.11	397
2016	4,733.61	2,017	2,331	2,402	13.13	183
2017	10,408.19	4,181	4,833	5,575	13.18	423
2018	13,025.65	4,882	5,643	7,383	13.21	559
2019	6,242.90	2,159	2,496	3,747	13.24	283
2024	38,929.18	5,529	6,391	32,538	13.41	2,426
2025	95,168.56	8,033	9,285	85,883	13.45	6,385
	592,520.00	300,461	347,302	245,218		18,720
DUBOIS SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2037						
NET SALVAGE PERCENT: 0						
1967	80,715.66	66,202	76,523	4,193	9.44	444
1969	27.09	22	25	2		
1976	1,655.47	1,326	1,533	123	9.46	13
1978	6,016.00	4,788	5,534	482	9.64	50
1980	2,081.36	1,645	1,901	180	10.00	18
1984	1,452.26	1,130	1,306	146	9.73	15
1986	1,466.30	1,130	1,306	160	10.00	16
1991	5,628.85	4,224	4,883	746	9.95	75
1993	19,099.51	14,151	16,357	2,742	10.01	274
1996	4,082.54	2,958	3,419	663	10.05	66
1997	13,613.93	9,784	11,309	2,305	10.07	229
1999	81.07	57	66	15	15.00	1
2000	20,579.25	14,374	16,615	3,964	10.11	392
2002	26,356.07	17,996	20,802	5,555	10.16	547
2003	21,650.94	14,598	16,874	4,777	10.19	469
2005	775.00	508	587	188	10.44	18

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YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
DUBOIS SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2037						
NET SALVAGE PERCENT: 0						
2008	5,099.64	3,175	3,670	1,430	10.29	139
2012	2,022.28	1,144	1,322	700	10.29	68
2013	12,349.08	6,770	7,825	4,524	10.35	437
2014	39,062.33	20,692	23,918	15,144	10.36	1,462
2016	20,527.11	9,980	11,536	8,991	10.39	865
2018	9,545.21	4,135	4,780	4,766	10.43	457
2019	3,427.78	1,379	1,594	1,834	10.48	175
2020	79,894.36	29,364	33,942	45,953	10.48	4,385
2021	5,966.32	1,958	2,263	3,703	10.49	353
2022	5,191.35	1,474	1,704	3,488	10.51	332
2024	15,105.99	2,634	3,045	12,061	10.56	1,142
2025	53,102.95	5,566	6,434	46,669	10.59	4,407
	456,575.70	243,164	281,073	175,503		16,849
MEADVILLE SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2037						
NET SALVAGE PERCENT: 0						
1962	50,342.77	41,727	48,232	2,111	9.30	227
1963	12,243.25	10,128	11,707	536	9.24	58
1974	940.15	758	876	64	9.14	7
1980	4,336.66	3,428	3,962	374	9.84	38
1984	3,117.80	2,425	2,803	315	9.84	32
1988	6,098.81	4,655	5,381	718	9.97	72
1989	2,400.00	1,822	2,106	294	9.80	30
1991	5,750.00	4,315	4,988	762	10.03	76
1993	6,060.92	4,491	5,191	870	10.00	87
1994	5,353.23	3,938	4,552	801	10.01	80
1998	34,149.82	24,322	28,114	6,036	10.09	598
1999	241.07	170	197	45	11.25	4
2000	59,583.52	41,616	48,104	11,480	10.12	1,134
2001	33,076.87	22,851	26,413	6,663	10.14	657
2006	9,202.23	5,938	6,864	2,339	10.21	229
2007	3,050.00	1,935	2,237	813	10.29	79
2008	6,989.58	4,352	5,030	1,959	10.26	191
2009	23,307.80	14,215	16,431	6,877	10.28	669
2010	4,428.08	2,642	3,054	1,374	10.25	134
2012	9,796.54	5,541	6,405	3,392	10.34	328
2013	24,548.17	13,458	15,556	8,992	10.35	869
2014	7,006.38	3,711	4,290	2,717	10.37	262
2016	8,839.99	4,298	4,968	3,872	10.41	372
2017	1,335.56	616	712	624	10.40	60
2020	30,990.81	11,390	13,166	17,825	10.48	1,701
2022	62,682.13	17,794	20,568	42,114	10.52	4,003
2023	52,740.23	12,283	14,198	38,542	10.54	3,657
2024	135,063.19	23,548	27,219	107,844	10.56	10,212
2025	11,609.14	1,217	1,407	10,202	10.59	963
	615,284.70	289,584	334,729	280,556		26,829

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YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
CLARION SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2036						
NET SALVAGE PERCENT: 0						
1936	9,903.31	8,678	9,903			
1937	2,759.12	2,414	2,759			
1938	210.94	184	211			
1939	582.38	508	582			
1944	10.39	9	10			
1945	326.86	282	326	1		
1950	321.44	276	319	2		
1952	433.28	371	429	4		
1953	332.05	284	329	3		
1954	69.30	59	68	1		
1955	275.00	234	271	4		
1962	856.57	721	834	22	7.33	3
1963	83.47	70	81	2		
1965	199.63	167	193	6	6.00	1
1966	177.21	148	171	6	6.00	1
1967	242.55	202	234	9	9.00	1
1968	1,416.69	1,179	1,364	53	8.83	6
1973	6,609.18	5,435	6,288	321	8.92	36
1975	530.69	434	502	29	9.67	3
1981	33,569.89	26,956	31,188	2,382	8.95	266
1982	22,711.57	18,170	21,022	1,689	8.98	188
1990	12,655.51	9,775	11,310	1,346	9.09	148
1993	9,346.08	7,093	8,206	1,140	9.12	125
1994	6,506.60	4,907	5,677	829	9.11	91
1996	1,000.00	744	861	139	9.27	15
2003	11,593.30	8,061	9,326	2,267	9.29	244
2005	13,549.81	9,176	10,616	2,933	9.31	315
2009	19,507.78	12,350	14,289	5,219	9.35	558
2012	1,698.49	1,001	1,158	540	9.47	57
2014	21,300.79	11,784	13,634	7,667	9.44	812
2017	3,843.90	1,866	2,159	1,685	9.47	178
2018	7,749.73	3,543	4,099	3,651	9.51	384
2019	12,074.65	5,145	5,953	6,122	9.51	644
2024	93,979.93	17,715	20,496	73,484	9.60	7,655
2025	36,556.02	4,204	4,864	31,692	9.62	3,294
	332,984.11	164,145	189,735	143,249		15,025
ERIE SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2035						
NET SALVAGE PERCENT: 0						
1947	236.25	206	236			
1957	134,862.55	116,154	134,262	600	7.69	78
1961	423.30	362	418	5	5.00	1
1962	148.51	127	147	2		
1966	201.20	171	198	4	4.00	1
1967	96.43	82	95	2		
1968	1,770.34	1,498	1,732	39	7.80	5
1969	500.00	422	488	12	6.00	2

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YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
ERIE SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2035						
NET SALVAGE PERCENT: 0						
1970	229.33	193	223	6	6.00	1
1971	7,042.51	5,922	6,845	197	7.88	25
1972	49,166.57	41,253	47,684	1,482	7.97	186
1973	9,678.83	8,102	9,365	314	8.05	39
1977	36,233.84	30,035	34,717	1,516	8.06	188
1978	16,827.85	13,912	16,081	747	8.03	93
1979	3,123.32	2,574	2,975	148	8.22	18
1983	74,357.79	60,524	69,960	4,398	8.13	541
1984	9,992.53	8,103	9,366	626	8.13	77
1987	2,479.34	1,987	2,297	183	8.32	22
1989	15,219.64	12,091	13,976	1,244	8.18	152
1990	205,165.94	162,231	187,523	17,643	8.22	2,146
1991	14,509.49	11,412	13,191	1,318	8.24	160
1993	27,393.57	21,314	24,637	2,757	8.25	334
1994	3,511.43	2,716	3,139	372	8.27	45
1995	11,772.42	9,049	10,460	1,313	8.26	159
1996	24,450.85	18,669	21,579	2,871	8.30	346
1997	64,477.75	48,866	56,484	7,994	8.31	962
1998	113,089.84	85,054	98,314	14,776	8.32	1,776
1999	40,303.36	30,068	34,756	5,548	8.33	666
2000	16,952.86	12,539	14,494	2,459	8.34	295
2001	3,357.11	2,460	2,844	514	8.29	62
2002	8,675.02	6,294	7,275	1,400	8.38	167
2003	8,065.31	5,789	6,692	1,374	8.38	164
2005	4,994.72	3,497	4,042	953	8.43	113
2006	34,812.67	24,045	27,794	7,019	8.41	835
2009	1,558.62	1,025	1,185	374	8.50	44
2011	1,822.48	1,149	1,328	494	8.52	58
2012	2,076.71	1,277	1,476	601	8.46	71
2013	26,847.78	16,060	18,564	8,284	8.49	976
2016	1,690.00	908	1,050	640	8.53	75
2017	5,182.34	2,653	3,067	2,116	8.53	248
2018	15,476.18	7,491	8,659	6,817	8.55	797
2019	156,166.24	70,640	81,653	74,514	8.56	8,705
2020	122,230.35	50,839	58,765	63,466	8.58	7,397
2021	29,341.93	10,998	12,713	16,629	8.59	1,936
2022	754,627.80	246,627	285,076	469,552	8.61	54,536
2023	21,835.08	5,925	6,849	14,986	8.62	1,739
2024	86,268.78	17,698	20,457	65,812	8.64	7,617
2025	6,466.00	816	943	5,523	8.66	638
	2,175,712.76	1,181,827	1,366,070	809,643		94,496
ERIE OFFICE, THIRD AND WAYNE						
INTERIM SURVIVOR CURVE: IOWA 55-R1						
PROBABLE RETIREMENT DATE: 6-2035						
NET SALVAGE PERCENT: 0						
1959	372.70	321	371	2		
1960	58,379.33	50,199	58,025	354	7.38	48
1963	573.36	490	566	7	7.00	1
1964	584.46	499	577	8	8.00	1

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YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
ERIE OFFICE, THIRD AND WAYNE						
INTERIM SURVIVOR CURVE: IOWA 55-R1						
PROBABLE RETIREMENT DATE: 6-2035						
NET SALVAGE PERCENT: 0						
1965	1,099.46	936	1,082	18	9.00	2
1968	1,810.94	1,532	1,771	40	8.00	5
1969	236.69	200	231	6	6.00	1
1971	5,020.44	4,220	4,878	143	7.94	18
1972	2,216.50	1,858	2,148	69	7.67	9
1973	4,742.34	3,966	4,584	158	7.90	20
1977	2,599.42	2,150	2,485	114	8.14	14
1979	41,832.56	34,388	39,749	2,084	7.98	261
1989	3,077.49	2,431	2,810	268	8.12	33
1991	637.10	498	576	61	8.71	7
1998	89,155.57	66,479	76,843	12,313	8.34	1,476
1999	23,148.49	17,116	19,784	3,364	8.35	403
2000	100,803.24	73,830	85,340	15,463	8.37	1,847
2003	40,815.12	28,976	33,493	7,322	8.40	872
2004	3,527.42	2,474	2,860	668	8.46	79
2005	12,046.47	8,340	9,640	2,406	8.41	286
2006	1,767.35	1,206	1,394	373	8.48	44
2007	169,108.66	113,660	131,379	37,729	8.44	4,470
2008	41,571.07	27,486	31,771	9,800	8.44	1,161
2010	257,114.41	163,478	188,964	68,151	8.46	8,056
2012	7,009.51	4,252	4,915	2,095	8.48	247
2013	4,610.24	2,718	3,142	1,469	8.49	173
2014	2,090.99	1,194	1,380	711	8.46	84
2015	23,306.85	12,843	14,845	8,462	8.49	997
2017	11,248.95	5,667	6,550	4,698	8.50	553
2018	78,764.80	37,465	43,306	35,459	8.51	4,167
2019	9,009.06	3,999	4,622	4,387	8.52	515
2021	5,242.61	1,928	2,229	3,014	8.54	353
2022	4,695.34	1,507	1,742	2,953	8.53	346
2025	38,304.74	4,715	5,450	32,855	8.55	3,843
2026	209,229.88	16,251	18,784	190,445	8.55	22,274
	1,255,753.56	699,272	808,286	447,468		52,666
WARREN SERVICE CENTER - NEW						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2062						
NET SALVAGE PERCENT: 0						
2007	729,486.36	259,807	300,310	429,176	29.25	14,673
2009	1,196.30	398	460	736	29.44	25
2010	34,550.71	11,045	12,767	21,784	29.72	733
2011	2,487.21	762	881	1,606	29.74	54
2012	23,304.35	6,827	7,891	15,413	30.04	513
2014	7,496.69	1,976	2,284	5,213	30.31	172
2017	31,378.67	6,718	7,765	23,613	30.87	765
2018	1,669.50	327	378	1,292	30.76	42
2019	50,140.17	8,861	10,242	39,898	31.22	1,278
2020	258,032.22	40,418	46,719	211,313	31.39	6,732
2021	7,965.18	1,078	1,246	6,719	31.54	213
2023	10,265.18	913	1,055	9,210	31.98	288
2024	116,478.74	7,399	8,552	107,926	32.14	3,358

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YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
WARREN SERVICE CENTER - NEW						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2062						
NET SALVAGE PERCENT: 0						
2025	5,475.07	199	230	5,245	32.38	162
	1,279,926.35	346,728	400,782	879,144		29,008
CORRY SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2036						
NET SALVAGE PERCENT: 0						
1951	6,042.91	5,175	5,982	61	8.71	7
1952	977.14	836	966	11	11.00	1
1979	2,344.92	1,896	2,192	153	9.00	17
1980	1,853.96	1,494	1,727	127	9.07	14
1988	3,190.26	2,489	2,877	313	8.94	35
1991	9,266.32	7,117	8,227	1,040	9.12	114
1992	3,673.60	2,806	3,243	430	9.15	47
1993	18,851.76	14,307	16,537	2,314	9.15	253
2003	3,347.81	2,328	2,691	657	9.25	71
2008	2,582.69	1,666	1,926	657	9.39	70
2009	2,444.16	1,547	1,788	656	9.37	70
2011	6,920.00	4,187	4,840	2,080	9.37	222
2015	3,574.30	1,905	2,202	1,372	9.46	145
2016	3,648.86	1,861	2,151	1,498	9.48	158
2019	6,975.21	2,972	3,435	3,540	9.52	372
2021	120,860.50	42,289	48,882	71,979	9.55	7,537
2023	17,201.65	4,317	4,990	12,212	9.58	1,275
2025	36,607.74	4,210	4,866	31,741	9.62	3,299
	250,363.79	103,402	119,522	130,842		13,707
ERIE - WELD SHOP AND GARAGE						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2035						
NET SALVAGE PERCENT: 0						
1998	82,754.45	62,239	71,942	10,813	8.32	1,300
1999	95,760.31	71,441	82,578	13,182	8.33	1,582
	178,514.76	133,680	154,520	23,995		2,882
WEST COUNTY SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2039						
NET SALVAGE PERCENT: 0						
1979	365,183.70	279,187	322,711	42,472	11.32	3,752
1980	32,267.02	24,568	28,398	3,869	11.35	341
1991	3,689.19	2,648	3,061	628	11.63	54
1993	16,452.49	11,637	13,451	3,001	11.68	257
2001	7,885.74	5,154	5,957	1,928	11.90	162
2005	5,270.81	3,250	3,757	1,514	12.02	126

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 375.3 STRUCTURES AND IMPROVEMENTS - LARGE
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
WEST COUNTY SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2039						
NET SALVAGE PERCENT: 0						
2006	20,460.40	12,400	14,333	6,127	11.99	511
2008	5,492.00	3,197	3,695	1,797	12.06	149
2011	1,277.81	690	798	480	12.00	40
2012	5,919.28	3,102	3,586	2,334	12.16	192
2014	10,459.00	5,098	5,893	4,566	12.18	375
2015	17,975.01	8,387	9,695	8,281	12.21	678
2016	1,789.73	795	919	871	12.27	71
2017	6,050.22	2,537	2,933	3,118	12.28	254
2019	4,234.70	1,536	1,775	2,459	12.30	200
2021	20,010.29	5,854	6,767	13,244	12.38	1,070
2022	85,317.66	21,420	24,759	60,558	12.41	4,880
2023	106,465.12	21,728	25,115	81,350	12.44	6,539
2024	30,143.19	4,555	5,265	24,878	12.47	1,995
2025	122,121.37	11,021	12,739	109,382	12.50	8,751
	868,464.73	428,764	495,607	372,858		30,397
OIL CITY - FRANKLIN SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2051						
NET SALVAGE PERCENT: 0						
1986	458,453.16	276,544	319,656	138,797	20.01	6,936
1995	106,444.48	58,269	67,353	39,092	20.80	1,879
1996	4,222.89	2,281	2,637	1,586	20.87	76
1999	324.28	167	193	131	21.83	6
2000	1,531.44	777	898	633	21.10	30
2002	755.00	369	427	328	21.87	15
2003	63,711.95	30,543	35,305	28,407	21.47	1,323
2004	16,679.72	7,826	9,046	7,634	21.56	354
2005	5,704.15	2,615	3,023	2,681	21.62	124
2007	7,002.42	3,048	3,523	3,479	21.74	160
2008	65,834.21	27,837	32,177	33,658	21.88	1,538
2010	4,725.77	1,873	2,165	2,561	22.08	116
2011	8,164.91	3,116	3,602	4,563	22.15	206
2012	189,302.40	69,381	80,197	109,105	22.21	4,912
2013	6,216.65	2,179	2,519	3,698	22.28	166
2014	27,885.38	9,289	10,737	17,148	22.39	766
2015	13,309.37	4,196	4,850	8,459	22.44	377
2016	31,184.87	9,230	10,669	20,516	22.55	910
2017	334,852.44	92,259	106,642	228,211	22.64	10,080
2018	5,082.70	1,290	1,491	3,592	22.73	158
2019	5,133.99	1,184	1,369	3,765	22.82	165
2020	81,015.85	16,658	19,255	61,761	22.91	2,696
2021	6,226.97	1,116	1,290	4,937	22.96	215
2022	163,475.41	24,590	28,423	135,052	23.10	5,846
2023	18,073.79	2,161	2,498	15,576	23.21	671
2024	20,579.00	1,775	2,052	18,527	23.30	795
	1,645,893.20	650,573	751,995	893,898		40,520

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 375.3 STRUCTURES AND IMPROVEMENTS - LARGE
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
BRADFORD						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2055						
NET SALVAGE PERCENT: 0						
1995	583,613.88	299,762	346,494	237,120	23.38	10,142
1996	1,302.21	659	762	540	23.48	23
1997	4,035.13	2,011	2,325	1,711	23.76	72
1999	81.08	39	45	36	18.00	2
2003	11,324.03	5,040	5,826	5,498	24.22	227
2012	11,717.45	3,922	4,533	7,184	25.21	285
2013	14,910.71	4,763	5,506	9,405	25.35	371
2015	47,608.06	13,621	15,744	31,864	25.55	1,247
2016	17,575.36	4,707	5,441	12,135	25.66	473
2018	23,061.92	5,264	6,085	16,977	25.92	655
2019	71,098.72	14,718	17,013	54,086	26.02	2,079
2020	9,272.81	1,705	1,971	7,302	26.17	279
2023	7,668.78	812	939	6,730	26.50	254
	803,270.14	357,023	412,682	390,588		16,109
SHARON-GREENVILLE SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2056						
NET SALVAGE PERCENT: 0						
1996	792,576.02	395,052	456,639	335,937	24.11	13,934
1999	81.07	38	44	37	18.50	2
2002	6,431.49	2,876	3,324	3,107	24.86	125
2008	1,984.30	758	876	1,108	25.77	43
2009	43,014.78	15,892	18,370	24,645	25.59	963
2011	57,199.56	19,586	22,639	34,560	25.83	1,338
2014	47,182.84	13,995	16,177	31,006	26.19	1,184
2016	5,511.88	1,443	1,668	3,844	26.51	145
2017	17,423.98	4,234	4,894	12,530	26.55	472
2018	3,074.00	686	793	2,281	26.52	86
2020	154,470.03	27,692	32,009	122,461	26.92	4,549
2021	5,081.08	790	913	4,168	27.06	154
2022	1,366.85	178	206	1,161	27.00	43
2023	6,353.21	655	757	5,596	27.30	205
2025	54,510.16	2,306	2,666	51,845	27.62	1,877
	1,196,261.25	486,181	561,975	634,286		25,120
	11,651,525.05	5,384,804	6,224,278	5,427,248		382,328

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 14.20 3.28

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 375.4 STRUCTURES AND IMPROVEMENTS - SMALL
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
1941	97.50	98	98			
1942	866.11	866	866			
1943	443.98	444	444			
1944	622.91	623	623			
1945	55.47	55	55			
1946	1,420.93	1,418	1,421			
1947	1,311.59	1,299	1,312			
1948	1,053.58	1,031	1,054			
1949	3,515.55	3,397	3,516			
1950	2,233.79	2,132	2,234			
1951	3,471.04	3,272	3,471			
1952	6,383.00	5,943	6,383			
1953	2,313.93	2,128	2,314			
1954	7,801.74	7,088	7,802			
1955	9,569.74	8,589	9,570			
1956	18,661.77	16,553	18,662			
1957	3,541.13	3,104	3,541			
1958	3,889.59	3,368	3,890			
1959	6,930.09	5,930	6,930			
1960	7,331.12	6,200	7,272	59	5.90	10
1961	2,573.57	2,151	2,523	51	6.38	8
1962	4,967.02	4,102	4,811	156	7.09	22
1963	5,206.41	4,247	4,981	225	7.26	31
1964	1,330.82	1,072	1,257	74	7.40	10
1965	19,439.00	15,473	18,147	1,292	8.18	158
1966	8,431.23	6,627	7,772	659	8.56	77
1967	8,909.45	6,916	8,111	798	8.97	89
1968	9,498.69	7,278	8,536	963	9.35	103
1969	1,451.14	1,097	1,287	165	9.71	17
1970	16,868.61	12,584	14,759	2,109	10.14	208
1971	4,581.70	3,372	3,955	627	10.63	59
1972	3,058.11	2,219	2,603	456	10.86	42
1973	4,882.55	3,493	4,097	786	11.39	69
1974	374.29	264	310	65	10.83	6
1975	288.95	201	236	53	13.25	4
1977	157.35	106	124	33	11.00	3
1978	12,616.35	8,358	9,803	2,814	13.53	208
1979	2,671.96	1,741	2,042	630	14.00	45
1980	167.12	107	125	42	14.00	3
1982	3,185.13	1,968	2,308	877	15.39	57
1983	957.76	581	681	276	15.33	18
1984	3,569.35	2,123	2,490	1,079	16.10	67
1985	1,905.84	1,111	1,303	603	16.75	36
1986	2,340.81	1,337	1,568	773	17.18	45
1987	1,126.14	630	739	387	17.59	22
1988	2,914.50	1,594	1,870	1,045	18.02	58
1991	1,758.49	896	1,051	708	19.67	36
1992	4,492.44	2,233	2,619	1,873	20.14	93
1993	6,364.75	3,081	3,614	2,751	20.68	133
1998	1,191.98	498	584	608	23.38	26
1999	13,514.04	5,456	6,399	7,115	23.88	298
2000	23,006.96	8,973	10,524	12,483	24.38	512

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 375.4 STRUCTURES AND IMPROVEMENTS - SMALL
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
2001	1,412.80	531	623	790	24.69	32
2002	4,969.84	1,799	2,110	2,860	25.54	112
2003	1,436.53	500	586	850	25.76	33
2005	39,590.15	12,629	14,812	24,778	27.23	910
2006	5,308.41	1,618	1,898	3,411	27.73	123
2007	3,431.60	995	1,167	2,265	28.31	80
2008	15,834.20	4,362	5,116	10,718	28.97	370
2009	27,980.79	7,296	8,557	19,424	29.56	657
2010	27,182.35	6,687	7,843	19,340	30.17	641
2011	35,544.65	8,220	9,641	25,904	30.76	842
2012	21,743.69	4,708	5,522	16,222	31.32	518
2013	16,273.30	3,279	3,846	12,428	31.95	389
2014	29,445.97	5,492	6,441	23,005	32.54	707
2015	52,049.36	8,926	10,469	41,581	33.13	1,255
2016	10,213.91	1,598	1,874	8,340	33.77	247
2017	44,650.20	6,318	7,410	37,240	34.35	1,084
2018	8,758.98	1,108	1,300	7,459	35.02	213
2019	28,549.90	3,176	3,725	24,825	35.57	698
2020	48,277.89	4,635	5,436	42,842	36.15	1,185
2021	45,976.83	3,713	4,355	41,622	36.77	1,132
2022	32,025.66	2,098	2,461	29,565	37.38	791
2024	12,672.32	440	516	12,156	38.59	315
2025	5,044.40	98	115	4,929	39.12	126
2026	609,882.85	7,166	8,405	601,478	39.53	15,216
	1,383,573.65	282,819	326,910	1,056,664		30,249
	1,383,573.65	282,819	326,910	1,056,664		30,249

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 34.90 2.19

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-L1.5						
NET SALVAGE PERCENT: 0						
1883	3,783.16	3,468	3,276	507	13.00	39
1884	1,168.12	1,080	1,020	148	11.38	13
1885	2,388.85	2,193	2,071	318	12.72	25
1886	19,105.14	17,416	16,449	2,656	13.62	195
1887	44,959.57	41,318	39,025	5,935	12.26	484
1888	37,276.56	34,011	32,123	5,154	13.28	388
1889	255.26	231	218	37	12.33	3
1890	28.08	26	25	3		
1891	560.45	508	480	80	13.33	6
1892	1,072.79	979	925	148	12.33	12
1893	516.33	468	442	74	14.80	5
1894	233.94	210	198	36	18.00	2
1895	456.37	413	390	66	13.20	5
1896	256.45	230	217	39	13.00	3
1897	153.27	137	129	24	12.00	2
1898	71.55	64	60	12	12.00	1
1899	49,014.08	43,662	41,239	7,775	15.61	498
1901	280.04	249	235	45	15.00	3
1902	824.85	738	697	128	14.22	9
1903	608.06	540	510	98	16.33	6
1904	54.84	48	45	10	10.00	1
1905	407.68	361	341	67	16.75	4
1906	20.38	18	17	3		
1909	126.70	111	105	22	22.00	1
1910	37.27	32	30	7		
1911	4,471.70	3,917	3,700	772	16.43	47
1912	2,068.72	1,796	1,696	373	16.95	22
1913	2,086.51	1,796	1,696	391	18.62	21
1914	1,675.61	1,448	1,368	308	18.12	17
1915	479.46	411	388	91	18.20	5
1916	106,678.04	91,743	86,652	20,026	17.94	1,116
1917	2,006.18	1,710	1,615	391	18.62	21
1918	2,290.42	1,959	1,850	440	18.33	24
1919	17,911.33	15,176	14,334	3,577	19.34	185
1920	5,196.78	4,417	4,172	1,025	18.64	55
1921	14,173.79	11,934	11,272	2,902	19.74	147
1922	13,546.11	11,438	10,803	2,743	19.18	143
1923	6,867.69	5,814	5,491	1,377	18.61	74
1924	31,985.51	26,817	25,329	6,657	19.70	338
1925	59,117.08	49,682	46,925	12,192	19.23	634
1926	117,605.13	97,859	92,428	25,177	20.22	1,245
1927	77,497.29	64,609	61,023	16,474	19.80	832
1928	45,729.21	37,740	35,646	10,083	20.79	485
1929	79,167.67	65,440	61,808	17,360	20.40	851
1930	92,000.05	76,158	71,931	20,069	20.03	1,002
1931	43,223.45	35,409	33,444	9,779	21.03	465
1932	22,376.53	18,349	17,331	5,046	20.68	244
1933	5,938.16	4,818	4,551	1,387	21.67	64
1934	24,066.23	19,537	18,453	5,613	21.42	262
1935	34,251.46	27,816	26,272	7,979	21.11	378
1936	32,817.98	26,359	24,896	7,922	22.13	358
1937	46,727.70	37,532	35,449	11,279	21.86	516
1938	44,438.19	35,688	33,707	10,731	21.64	496

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-L1.5						
NET SALVAGE PERCENT: 0						
1939	31,079.08	24,677	23,308	7,771	22.66	343
1940	22,721.84	18,030	17,029	5,693	22.41	254
1941	31,948.68	25,329	23,923	8,026	22.29	360
1942	8,054.54	6,311	5,961	2,094	23.27	90
1943	2,988.82	2,339	2,209	780	22.94	34
1944	4,126.69	3,225	3,046	1,081	23.00	47
1945	8,409.39	6,559	6,195	2,214	22.82	97
1946	34,331.65	26,449	24,981	9,351	23.92	391
1947	112,360.68	86,372	81,579	30,782	23.84	1,291
1948	110,940.17	85,069	80,348	30,592	23.81	1,285
1949	202,027.37	154,511	145,936	56,091	23.76	2,361
1950	264,415.74	199,607	188,529	75,887	24.76	3,065
1951	273,310.42	205,666	194,252	79,058	24.75	3,194
1952	175,255.21	131,424	124,130	51,125	24.76	2,065
1953	175,430.93	131,082	123,807	51,624	24.78	2,083
1954	259,099.41	192,822	182,121	76,978	24.83	3,100
1955	735,557.79	545,048	514,800	220,758	24.90	8,866
1956	836,901.31	617,298	583,040	253,861	24.99	10,159
1957	442,062.09	324,474	306,467	135,595	25.09	5,404
1958	218,845.33	159,823	150,953	67,892	25.21	2,693
1959	352,013.54	255,667	241,478	110,536	25.34	4,362
1960	205,877.72	147,306	139,131	66,747	26.34	2,534
1961	215,757.71	153,447	144,931	70,827	26.50	2,673
1962	192,949.75	137,612	129,975	62,975	25.84	2,437
1963	286,586.95	203,018	191,751	94,836	26.04	3,642
1964	359,728.57	253,033	238,990	120,739	26.25	4,600
1965	696,250.98	486,122	459,144	237,107	26.47	8,958
1966	1,239,887.53	859,118	811,440	428,448	26.70	16,047
1967	1,465,565.29	1,007,283	951,382	514,183	26.96	19,072
1968	1,345,580.82	917,013	866,122	479,459	27.22	17,614
1969	1,421,716.02	960,511	907,206	514,510	27.49	18,716
1970	1,442,048.00	965,307	911,736	530,312	27.78	19,090
1971	1,907,433.42	1,275,119	1,204,354	703,079	27.40	25,660
1972	1,572,800.59	1,040,879	983,114	589,687	27.72	21,273
1973	1,998,103.55	1,308,758	1,236,126	761,978	28.05	27,165
1974	1,865,157.98	1,208,436	1,141,372	723,786	28.40	25,485
1975	1,156,680.21	746,984	705,529	451,151	28.11	16,049
1976	1,262,956.80	806,019	761,288	501,669	28.49	17,609
1977	3,280,901.85	2,068,281	1,953,498	1,327,404	28.88	45,963
1978	3,044,927.00	1,895,163	1,789,988	1,254,939	29.27	42,875
1979	2,288,526.15	1,416,598	1,337,981	950,545	29.08	32,687
1980	3,240,917.32	1,978,580	1,868,775	1,372,142	29.51	46,498
1981	2,761,327.30	1,674,469	1,581,541	1,179,786	29.37	40,170
1982	2,891,426.01	1,727,338	1,631,476	1,259,950	29.82	42,252
1983	3,744,987.09	2,202,801	2,080,553	1,664,434	30.28	54,968
1984	4,548,958.01	2,652,043	2,504,863	2,044,095	30.22	67,640
1985	5,498,593.94	3,152,894	2,977,918	2,520,676	30.69	82,133
1986	6,046,282.94	3,431,266	3,240,842	2,805,441	30.67	91,472
1987	4,508,695.66	2,513,147	2,373,675	2,135,021	31.17	68,496
1988	7,098,541.49	3,909,877	3,692,891	3,405,650	31.19	109,190
1989	6,257,643.66	3,379,753	3,192,188	3,065,456	31.72	96,641
1990	6,090,821.94	3,245,799	3,065,668	3,025,154	31.78	95,190
1991	6,925,580.74	3,613,075	3,412,561	3,513,020	32.32	108,695
1992	7,075,136.71	3,635,205	3,433,463	3,641,674	32.41	112,363
1993	7,854,364.52	3,943,676	3,724,815	4,129,550	32.97	125,252

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-L1.5						
NET SALVAGE PERCENT: 0						
1994	5,986,486.85	2,953,733	2,789,810	3,196,677	33.11	96,547
1995	6,495,069.30	3,125,427	2,951,976	3,543,093	33.69	105,167
1996	5,750,034.28	2,713,441	2,562,854	3,187,180	33.85	94,156
1997	7,244,389.46	3,326,624	3,142,007	4,102,382	34.45	119,082
1998	5,113,110.24	2,296,809	2,169,343	2,943,767	34.64	84,982
1999	5,420,817.97	2,363,477	2,232,312	3,188,506	35.25	90,454
2000	5,682,340.50	2,416,131	2,282,043	3,400,298	35.48	95,837
2001	4,142,248.99	1,704,950	1,610,331	2,531,918	36.10	70,136
2002	5,308,558.55	2,111,214	1,994,048	3,314,511	36.73	90,240
2003	5,245,379.03	2,024,716	1,912,351	3,333,028	36.99	90,106
2004	4,688,942.30	1,742,411	1,645,713	3,043,229	37.63	80,872
2005	3,071,240.86	1,102,883	1,041,677	2,029,564	37.92	53,522
2006	5,181,055.88	1,783,319	1,684,350	3,496,706	38.58	90,635
2007	7,042,962.80	2,331,925	2,202,511	4,840,452	38.89	124,465
2008	6,023,647.35	1,901,665	1,796,129	4,227,518	39.55	106,890
2009	6,655,555.95	2,009,312	1,897,802	4,757,754	39.89	119,272
2010	5,592,821.35	1,599,547	1,510,777	4,082,044	40.57	100,617
2011	6,256,636.42	1,698,051	1,603,815	4,652,821	40.93	113,678
2012	5,425,522.27	1,384,051	1,307,240	4,118,282	41.61	98,973
2013	7,424,385.82	1,780,368	1,681,563	5,742,823	42.00	136,734
2014	5,640,318.15	1,257,791	1,187,988	4,452,330	42.69	104,294
2015	7,797,349.78	1,614,051	1,524,476	6,272,874	43.10	145,542
2016	9,722,952.71	1,843,472	1,741,165	7,981,788	43.81	182,191
2017	7,093,908.41	1,227,246	1,159,138	5,934,770	44.22	134,210
2018	9,026,945.99	1,400,079	1,322,379	7,704,567	44.94	171,441
2019	9,563,402.63	1,317,837	1,244,701	8,318,702	45.38	183,312
2020	12,492,552.54	1,499,106	1,415,910	11,076,643	45.83	241,690
2021	11,248,202.08	1,139,443	1,076,208	10,171,994	46.56	218,471
2022	10,480,733.33	868,853	820,634	9,660,099	47.03	205,403
2023	27,831,717.84	1,781,230	1,682,378	26,149,340	47.51	550,397
2024	28,656,465.20	1,283,810	1,212,562	27,443,903	48.00	571,748
2025	14,813,794.78	373,308	352,591	14,461,204	48.26	299,652
2026	24,794,809.33	381,840	360,649	24,434,160	48.03	508,727
	400,109,007.61	121,401,715	114,664,307	285,444,701		7,053,848

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 40.50 1.76

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 376.2 MAINS - CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 27-S2.5						
NET SALVAGE PERCENT: 0						
1968	2,122.39	2,122	2,122			
1972	1,357.07	1,357	1,357			
1973	61,612.78	61,613	61,613			
1974	15,712.02	15,599	15,712			
1975	23,824.85	23,687	23,825			
1979	1,144.08	1,119	1,144			
1980	21,388.99	20,773	21,389			
1981	1,914.52	1,854	1,915			
1983	361.35	347	361			
1985	70,446.41	66,840	70,446			
1986	9,078.34	8,550	9,078			
1987	3,318.81	3,113	3,319			
1988	4,020.20	3,752	4,020			
1989	19,202.98	17,740	19,203			
1997	4,741.69	4,064	4,610	132	4.89	27
1998	2,525.03	2,133	2,420	105	5.25	20
1999	3,804.86	3,172	3,598	207	5.45	38
2001	493,780.92	397,741	451,198	42,583	6.10	6,981
2003	170,851.88	131,881	149,606	21,246	6.87	3,093
2004	4,542.27	3,416	3,875	667	7.33	91
2005	5,491.58	4,026	4,567	925	7.71	120
2006	34,155.72	24,278	27,541	6,615	8.24	803
2007	248,503.58	171,269	194,288	54,216	8.68	6,246
2009	3,401.35	2,165	2,456	945	9.84	96
2011	218,646.97	126,706	143,735	74,912	11.07	6,767
2012	340,704.73	186,911	212,032	128,673	11.72	10,979
2013	102,029.71	52,586	59,654	42,376	12.46	3,401
2016	180,675.06	73,896	83,828	96,847	14.81	6,539
2017	238,600.54	88,712	100,635	137,966	15.63	8,827
2018	42,916.95	14,304	16,226	26,691	16.50	1,618
2020	81,336.86	20,692	23,473	57,864	18.32	3,159
2023	3,766.71	501	568	3,199	21.19	151
2025	74,670.40	3,816	4,329	70,341	23.20	3,032
2026	250,452.62	7,689	8,723	241,730	23.70	10,200
	2,741,104.22	1,548,424	1,732,866	1,008,238		72,188

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 14.00 2.63

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
1911	34.69	35	35			
1914	92.64	93	93			
1916	342.06	342	342			
1917	207.62	208	208			
1918	481.80	482	482			
1919	260.14	260	260			
1920	15.32	15	15			
1921	238.55	239	239			
1922	19.36	19	19			
1923	890.44	890	890			
1924	1,181.35	1,181	1,181			
1925	667.68	668	668			
1926	17.90	18	18			
1927	400.29	400	400			
1928	286.98	287	287			
1929	471.76	472	472			
1930	735.63	736	736			
1931	219.93	220	220			
1932	17.88	18	18			
1933	234.52	235	235			
1934	21.91	22	22			
1935	4.71	5	5			
1936	1,357.32	1,357	1,357			
1937	391.96	392	392			
1938	1,523.39	1,523	1,523			
1939	1,585.33	1,585	1,585			
1940	226.16	226	226			
1941	550.73	551	551			
1942	1,294.57	1,295	1,295			
1943	277.27	277	277			
1944	273.68	274	274			
1945	132.83	133	133			
1946	2,759.03	2,759	2,759			
1947	2,499.57	2,496	2,487	13	1.00	13
1948	6,153.47	6,067	6,045	108	1.11	97
1949	3,463.87	3,398	3,386	78	1.50	52
1950	2,531.19	2,470	2,461	70	1.89	37
1951	6,984.17	6,780	6,755	229	2.27	101
1952	9,905.01	9,560	9,525	380	2.68	142
1953	9,151.23	8,782	8,750	401	3.08	130
1954	5,303.95	5,058	5,039	265	3.53	75
1955	16,281.27	15,428	15,371	910	3.94	231
1956	30,343.71	28,566	28,461	1,883	4.37	431
1957	8,949.20	8,367	8,336	613	4.83	127
1958	8,868.36	8,232	8,202	666	5.29	126
1959	9,493.27	8,746	8,714	779	5.73	136
1960	7,086.84	6,526	6,502	585	5.68	103
1961	5,066.34	4,628	4,611	455	6.15	74
1962	7,498.99	6,793	6,768	731	6.65	110
1963	7,109.78	6,386	6,363	747	7.18	104
1964	5,597.11	5,017	4,999	598	7.20	83
1965	17,667.33	15,690	15,632	2,035	7.71	264
1966	12,952.75	11,393	11,351	1,602	8.26	194

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
1967	14,875.25	13,044	12,996	1,879	8.31	226
1968	8,529.11	7,402	7,375	1,154	8.88	130
1969	13,270.82	11,473	11,431	1,840	8.98	205
1970	12,824.00	10,965	10,925	1,899	9.54	199
1971	13,933.74	11,855	11,812	2,122	9.69	219
1972	14,160.47	11,908	11,864	2,296	10.25	224
1973	43,208.68	36,122	35,990	7,219	10.45	691
1974	15,610.08	12,888	12,841	2,769	11.03	251
1975	5,101.78	4,183	4,168	934	11.25	83
1976	22,686.70	18,467	18,399	4,288	11.47	374
1977	24,574.38	19,728	19,656	4,918	12.11	406
1978	27,592.19	21,966	21,885	5,707	12.35	462
1979	30,194.33	23,826	23,739	6,455	12.63	511
1980	115,234.77	90,067	89,737	25,498	12.92	1,974
1981	55,109.32	42,644	42,488	12,621	13.23	954
1982	60,466.61	46,021	45,852	14,615	13.89	1,052
1983	161,457.76	121,513	121,068	40,390	14.22	2,840
1984	138,003.92	102,620	102,244	35,760	14.57	2,454
1985	136,025.94	99,870	99,504	36,522	14.93	2,446
1986	185,162.03	134,150	133,658	51,504	15.31	3,364
1987	184,355.07	132,422	131,936	52,419	15.39	3,406
1988	207,479.73	146,813	146,275	61,205	15.81	3,871
1989	181,475.38	126,416	125,953	55,522	16.22	3,423
1990	203,812.93	139,632	139,120	64,693	16.66	3,883
1991	227,047.49	152,871	152,310	74,737	17.10	4,371
1992	208,182.58	138,317	137,810	70,373	17.30	4,068
1993	258,005.19	168,142	167,526	90,479	17.77	5,092
1994	150,466.71	96,570	96,216	54,251	18.00	3,014
1995	206,979.15	130,004	129,527	77,452	18.50	4,187
1996	107,475.59	66,323	66,080	41,396	18.77	2,205
1997	149,955.41	90,363	90,032	59,923	19.29	3,106
1998	48,944.31	28,897	28,791	20,153	19.60	1,028
1999	18,344.35	10,598	10,559	7,785	19.91	391
2000	46,137.66	26,040	25,945	20,193	20.25	997
2001	46,935.23	25,833	25,738	21,197	20.62	1,028
2002	170,402.98	91,319	90,984	79,419	21.00	3,782
2003	50,133.22	26,225	26,129	24,004	21.20	1,132
2004	83,369.79	42,293	42,138	41,232	21.61	1,908
2005	156,222.26	77,018	76,736	79,486	21.85	3,638
2006	34,697.75	16,582	16,521	18,177	22.11	822
2007	192,890.96	89,116	88,789	104,102	22.42	4,643
2008	139,501.29	62,120	61,892	77,609	22.73	3,414
2009	156,180.45	66,814	66,569	89,611	23.07	3,884
2010	159,978.72	65,767	65,526	94,453	23.28	4,057
2011	220,967.51	86,929	86,610	134,358	23.51	5,715
2012	283,912.07	106,808	106,416	177,496	23.63	7,511
2013	200,230.32	71,642	71,379	128,851	23.79	5,416
2014	267,532.02	90,453	90,121	177,411	23.98	7,398
2015	216,112.24	68,810	68,558	147,554	24.08	6,128
2016	284,959.23	85,003	84,691	200,268	24.11	8,306
2017	469,888.51	129,971	129,495	340,394	24.19	14,072
2018	181,128.35	46,170	46,001	135,127	24.11	5,605
2019	537,616.50	124,727	124,270	413,346	24.00	17,223
2020	583,348.93	121,395	120,950	462,399	23.78	19,445
2021	465,852.69	85,111	84,799	381,054	23.49	16,222

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
2022	601,987.41	93,669	93,325	508,662	23.07	22,049
2023	445,596.86	56,502	56,295	389,302	22.39	17,387
2024	384,994.57	36,728	36,593	348,402	21.33	16,334
2025	542,601.75	32,556	32,437	510,165	19.58	26,055
2026	694,465.14	27,848	27,746	666,719	17.94	37,164
	11,068,313.02	4,309,129	4,293,395	6,774,918		325,075

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 20.80 2.94

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 380 SERVICES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
1884	63.76	64	64			
1886	806.42	806	806			
1887	231.45	231	231			
1888	39.69	40	40			
1889	75.66	76	76			
1890	47.35	47	47			
1891	99.36	99	99			
1892	78.72	79	79			
1893	17.24	17	17			
1894	70.17	70	70			
1895	79.42	79	79			
1896	138.42	138	138			
1897	210.58	211	211			
1898	181.47	181	181			
1899	91.64	92	92			
1900	10.28	10	10			
1901	544.19	544	544			
1902	1,905.92	1,906	1,906			
1903	3,235.36	3,235	3,235			
1904	2,400.06	2,400	2,400			
1905	2,151.11	2,151	2,151			
1906	2,107.49	2,107	2,107			
1907	2,201.87	2,202	2,202			
1908	1,912.86	1,913	1,913			
1909	1,524.20	1,524	1,524			
1910	1,359.21	1,359	1,359			
1911	666.40	666	666			
1912	505.02	505	505			
1913	535.64	536	536			
1914	569.37	569	569			
1915	975.56	976	976			
1916	11,381.36	11,381	11,381			
1917	462.52	460	463			
1918	5,129.41	5,108	5,129			
1919	1,364.80	1,347	1,365			
1920	798.77	789	799			
1921	2,635.21	2,579	2,635			
1922	3,636.65	3,526	3,637			
1923	2,644.00	2,566	2,644			
1924	3,455.03	3,321	3,455			
1925	5,203.98	5,006	5,204			
1926	2,376.31	2,263	2,376			
1927	2,692.23	2,565	2,692			
1928	3,396.66	3,204	3,397			
1929	4,285.94	4,043	4,286			
1930	3,019.60	2,848	3,020			
1931	2,605.96	2,432	2,606			
1932	1,212.78	1,132	1,213			
1933	1,234.66	1,140	1,235			
1934	3,135.23	2,892	3,135			
1935	2,647.07	2,440	2,647			
1936	2,131.75	1,943	2,128	4		
1937	2,584.61	2,353	2,577	8	8.00	1

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 380 SERVICES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
1938	2,471.98	2,247	2,461	11	11.00	1
1939	2,690.58	2,418	2,649	42	10.50	4
1940	3,177.90	2,851	3,123	55	9.17	6
1941	3,278.62	2,935	3,215	64	10.67	6
1942	1,411.34	1,248	1,367	44	11.00	4
1943	679.71	600	657	23	11.50	2
1944	834.59	735	805	30	10.00	3
1945	961.61	844	924	38	12.67	3
1946	2,943.72	2,551	2,794	150	12.50	12
1947	4,261.35	3,681	4,032	229	12.72	18
1948	6,990.46	6,017	6,591	399	12.47	32
1949	8,531.39	7,316	8,013	518	12.95	40
1950	10,773.68	9,119	9,988	786	13.79	57
1951	12,776.24	10,768	11,795	981	14.01	70
1952	14,081.95	11,815	12,941	1,141	14.26	80
1953	11,400.86	9,520	10,428	973	14.52	67
1954	14,168.24	11,772	12,894	1,274	14.64	87
1955	21,752.90	17,979	19,693	2,060	14.93	138
1956	28,814.67	23,683	25,941	2,874	15.21	189
1957	24,196.11	19,604	21,473	2,723	16.21	168
1958	13,838.79	11,146	12,209	1,630	16.46	99
1959	19,351.13	15,487	16,963	2,388	16.82	142
1960	18,336.60	14,578	15,968	2,369	17.04	139
1961	20,109.06	15,876	17,389	2,720	17.44	156
1962	20,601.21	16,147	17,686	2,915	17.67	165
1963	29,881.23	23,248	25,464	4,417	18.03	245
1964	29,441.64	22,726	24,892	4,550	18.42	247
1965	32,290.56	24,722	27,079	5,212	18.75	278
1966	151,111.88	114,724	125,661	25,451	19.11	1,332
1967	179,708.72	135,231	148,122	31,587	19.49	1,621
1968	183,881.84	137,102	150,172	33,710	19.88	1,696
1969	188,651.99	139,319	152,600	36,052	20.27	1,779
1970	305,739.97	223,557	244,869	60,871	20.68	2,943
1971	419,547.96	303,669	332,618	86,930	21.08	4,124
1972	510,989.72	365,920	400,803	110,187	21.51	5,123
1973	526,447.26	375,673	411,486	114,961	21.37	5,380
1974	750,435.48	529,357	579,820	170,615	21.82	7,819
1975	467,611.40	325,925	356,995	110,616	22.28	4,965
1976	611,243.37	420,780	460,893	150,350	22.74	6,612
1977	1,463,610.15	994,669	1,089,490	374,120	23.22	16,112
1978	1,002,622.10	672,459	736,564	266,058	23.69	11,231
1979	1,549,094.22	1,032,007	1,130,387	418,707	23.67	17,689
1980	2,155,095.86	1,415,467	1,550,402	604,694	24.17	25,018
1981	2,200,741.36	1,424,100	1,559,858	640,883	24.68	25,968
1982	2,022,503.30	1,297,638	1,421,341	601,162	24.72	24,319
1983	1,993,760.88	1,258,861	1,378,867	614,894	25.25	24,352
1984	2,444,477.46	1,518,265	1,663,000	781,477	25.78	30,313
1985	1,398,344.05	859,422	941,350	456,994	25.87	17,665
1986	2,682,459.62	1,619,669	1,774,071	908,389	26.41	34,396
1987	2,603,801.44	1,553,428	1,701,515	902,286	26.54	33,997
1988	3,438,938.88	2,012,467	2,204,314	1,234,625	27.11	45,541
1989	3,595,195.64	2,075,866	2,273,757	1,321,439	27.26	48,475
1990	3,432,849.67	1,941,276	2,126,336	1,306,514	27.85	46,913
1991	3,771,186.11	2,100,551	2,300,795	1,470,391	28.04	52,439
1992	3,759,052.89	2,047,180	2,242,336	1,516,717	28.64	52,958

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 380 SERVICES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
1993	4,007,537.24	2,145,235	2,349,739	1,657,798	28.86	57,443
1994	4,204,113.14	2,210,102	2,420,789	1,783,324	29.10	61,283
1995	4,359,073.17	2,247,538	2,461,794	1,897,279	29.36	64,621
1996	4,136,023.82	2,089,519	2,288,711	1,847,313	29.63	62,346
1997	5,386,813.80	2,647,080	2,899,424	2,487,390	30.27	82,173
1998	4,239,564.44	2,035,839	2,229,914	2,009,650	30.58	65,718
1999	4,486,404.01	2,114,891	2,316,502	2,169,902	30.55	71,028
2000	4,773,921.00	2,193,139	2,402,209	2,371,712	30.89	76,779
2001	3,878,821.77	1,733,445	1,898,693	1,980,129	31.25	63,364
2002	4,723,299.86	2,050,384	2,245,846	2,477,454	31.61	78,376
2003	4,764,541.74	2,016,354	2,208,572	2,555,970	31.69	80,655
2004	4,374,022.80	1,790,725	1,961,433	2,412,590	32.10	75,159
2005	4,870,801.53	1,935,657	2,120,182	2,750,620	32.22	85,370
2006	4,808,309.16	1,850,237	2,026,619	2,781,690	32.38	85,908
2007	4,821,293.78	1,791,111	1,961,856	2,859,438	32.56	87,821
2008	5,250,385.77	1,878,063	2,057,097	3,193,289	32.77	97,445
2009	5,281,585.49	1,813,168	1,986,016	3,295,569	33.00	99,866
2010	4,852,833.18	1,600,950	1,753,567	3,099,266	33.01	93,889
2011	5,363,135.24	1,693,142	1,854,548	3,508,587	33.06	106,128
2012	5,225,986.81	1,571,454	1,721,260	3,504,727	33.14	105,755
2013	5,223,537.53	1,488,186	1,630,054	3,593,484	33.26	108,042
2014	4,788,580.33	1,290,522	1,413,546	3,375,034	33.20	101,658
2015	4,780,320.96	1,209,899	1,325,238	3,455,083	33.20	104,069
2016	5,517,856.13	1,306,628	1,431,188	4,086,668	33.04	123,688
2017	5,123,778.80	1,123,132	1,230,199	3,893,580	32.95	118,166
2018	5,567,928.24	1,120,824	1,227,671	4,340,257	32.73	132,608
2019	6,201,227.75	1,132,964	1,240,969	4,960,259	32.43	152,953
2020	5,658,930.65	926,933	1,015,297	4,643,634	31.92	145,477
2021	7,101,096.28	1,017,587	1,114,593	5,986,503	31.38	190,774
2022	5,498,570.62	670,826	734,775	4,763,796	30.59	155,731
2023	7,655,162.13	756,330	828,430	6,826,732	29.64	230,322
2024	6,117,840.96	452,720	495,878	5,621,963	28.15	199,714
2025	8,271,061.89	382,123	418,550	7,852,512	25.78	304,597
2026	14,508,089.00	446,849	489,447	14,018,642	23.64	593,005
	230,084,470.78	80,009,942	87,631,319	142,453,152		4,815,170

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 29.60 2.09

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 381 METERS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 37-R1.5						
NET SALVAGE PERCENT: 0						
1917	12.45	12	12			
1919	33.76	34	34			
1920	45.16	45	45			
1922	45.94	46	46			
1923	17.63	18	18			
1924	36.41	36	36			
1929	18.18	18	18			
1931	27.79	28	28			
1938	41.25	41	41			
1944	79.12	79	79			
1945	10.10	10	10			
1946	72.79	73	73			
1949	364.29	364	364			
1950	1,452.53	1,453	1,453			
1951	747.92	748	748			
1952	571.22	571	571			
1953	2,341.13	2,332	2,341			
1954	714.00	707	714			
1955	663.61	652	664			
1956	260.09	256	260			
1957	3,268.38	3,191	3,268			
1958	4,328.97	4,196	4,329			
1959	3,083.32	2,986	3,083			
1960	3,449.70	3,314	3,450			
1961	2,521.42	2,419	2,521			
1962	8,105.94	7,760	8,100	6	3.00	2
1963	7,544.16	7,205	7,521	23	2.88	8
1964	2,950.92	2,792	2,914	37	3.70	10
1965	9,108.72	8,591	8,968	141	3.71	38
1966	7,195.51	6,763	7,060	136	3.89	35
1967	9,488.44	8,883	9,273	215	4.06	53
1968	7,596.31	7,080	7,391	205	4.27	48
1969	5,111.33	4,740	4,948	163	4.53	36
1970	10,519.09	9,704	10,130	389	4.74	82
1971	8,220.40	7,540	7,871	349	4.99	70
1972	10,140.58	9,242	9,647	494	5.26	94
1973	9,501.99	8,601	8,978	524	5.57	94
1974	121,381.15	109,085	113,869	7,512	5.89	1,275
1975	160,866.58	143,461	149,753	11,114	6.22	1,787
1976	58,416.74	51,956	54,235	4,182	6.25	669
1977	120,276.03	106,035	110,685	9,591	6.61	1,451
1978	38,314.23	33,460	34,927	3,387	7.00	484
1979	154,500.33	134,323	140,214	14,286	7.10	2,012
1980	122,168.69	105,090	109,699	12,470	7.52	1,658
1981	165,099.73	140,450	146,610	18,490	7.94	2,329
1982	73,092.25	61,778	64,487	8,605	8.10	1,062
1983	81,897.35	68,360	71,358	10,539	8.56	1,231
1984	134,150.18	111,090	115,962	18,188	8.77	2,074
1985	118,615.45	96,885	101,134	17,481	9.25	1,890
1986	79,394.54	64,230	67,047	12,348	9.50	1,300
1987	101,886.24	81,580	85,158	16,728	9.77	1,712
1988	202,125.76	159,275	166,260	35,866	10.29	3,486
1989	150,822.42	117,415	122,565	28,257	10.60	2,666

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 381 METERS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 37-R1.5						
NET SALVAGE PERCENT: 0						
1990	82,135.41	63,121	65,889	16,246	10.92	1,488
1991	132,944.50	100,293	104,692	28,252	11.48	2,461
1992	171,835.29	127,708	133,309	38,526	11.83	3,257
1993	260,734.12	190,727	199,092	61,642	12.20	5,053
1994	79,356.55	57,073	59,576	19,781	12.59	1,571
1995	139,116.94	98,244	102,553	36,564	13.00	2,813
1996	145,557.53	100,828	105,250	40,308	13.42	3,004
1997	187,065.63	126,400	131,944	55,122	14.04	3,926
1998	139,815.42	92,418	96,471	43,344	14.49	2,991
1999	158,043.08	102,064	106,540	51,503	14.95	3,445
2000	102,880.24	64,815	67,658	35,222	15.42	2,284
2001	152,742.15	94,104	98,231	54,511	15.73	3,465
2002	12,623.67	7,562	7,894	4,730	16.25	291
2003	36,248.17	21,067	21,991	14,257	16.75	851
2004	229,602.53	129,243	134,911	94,692	17.28	5,480
2005	316,780.39	172,329	179,887	136,893	17.81	7,686
2006	180,017.03	94,779	98,936	81,081	18.21	4,453
2007	356,221.39	180,355	188,265	167,956	18.77	8,948
2008	334,345.50	162,927	170,072	164,274	19.20	8,556
2009	546,043.99	255,276	266,472	279,572	19.65	14,228
2010	344,676.64	154,036	160,792	183,885	20.11	9,144
2011	117,847.33	50,144	52,343	65,504	20.59	3,181
2012	274,213.29	110,590	115,440	158,773	21.08	7,532
2013	438,277.24	166,677	173,987	264,290	21.59	12,241
2014	663,618.04	237,376	247,787	415,831	22.00	18,901
2015	1,076,200.43	359,559	375,328	700,872	22.42	31,261
2016	482,722.15	149,451	156,005	326,717	22.86	14,292
2017	807,080.27	229,937	240,021	567,059	23.22	24,421
2018	606,538.14	157,639	164,553	441,985	23.50	18,808
2019	441,748.82	103,104	107,626	334,123	23.81	14,033
2020	497,016.90	102,485	106,980	390,037	24.05	16,218
2021	1,161,645.62	206,773	215,841	945,805	24.25	39,002
2022	789,509.72	117,479	122,631	666,879	24.32	27,421
2023	879,375.72	104,030	108,593	770,783	24.22	31,824
2025	2,423,573.53	124,814	130,288	2,293,286	23.02	99,621
2026	966,018.81	31,975	33,377	932,642	21.93	42,528
	17,736,870.40	6,344,405	6,622,195	11,114,675		524,335

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 21.20 2.96

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 382 METER INSTALLATIONS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
1925	12.97	12	13			
1966	14,500.30	11,009	12,665	1,835	19.11	96
1967	33,391.67	25,127	28,908	4,484	19.50	230
1968	33,667.56	25,103	28,880	4,788	19.87	241
1969	34,166.34	25,232	29,028	5,138	20.31	253
1970	48,000.43	35,098	40,379	7,621	20.65	369
1971	82,508.13	59,719	68,704	13,804	21.07	655
1972	122,813.01	87,946	101,178	21,635	21.51	1,006
1973	151,967.71	108,444	124,760	27,208	21.37	1,273
1974	84,045.00	59,285	68,205	15,840	21.82	726
1975	33,817.22	23,571	27,117	6,700	22.26	301
1976	56,493.99	38,890	44,741	11,753	22.73	517
1977	90,309.92	61,375	70,609	19,701	23.23	848
1978	45,877.32	30,770	35,400	10,477	23.70	442
1979	48,501.91	32,312	37,174	11,328	23.65	479
1980	58,598.57	38,488	44,279	14,320	24.19	592
1981	59,002.19	38,180	43,924	15,078	24.68	611
1982	57,237.00	36,723	42,248	14,989	24.73	606
1983	64,625.68	40,805	46,944	17,682	25.26	700
1984	62,354.69	38,728	44,555	17,800	25.80	690
1985	71,730.22	44,085	50,718	21,012	25.88	812
1986	67,439.42	40,720	46,847	20,592	26.40	780
1987	66,350.89	39,585	45,541	20,810	26.54	784
1988	80,448.30	47,078	54,161	26,287	27.10	970
1989	63,954.04	36,927	42,483	21,471	27.25	788
1990	57,943.53	32,767	37,697	20,247	27.85	727
1991	61,261.30	34,123	39,257	22,004	28.03	785
1992	56,325.09	30,675	35,290	21,035	28.66	734
1993	54,975.77	29,429	33,857	21,119	28.85	732
1994	47,350.84	24,892	28,637	18,714	29.10	643
1995	45,282.09	23,347	26,860	18,422	29.38	627
1996	45,890.75	23,184	26,672	19,219	29.61	649
1997	71,756.82	35,261	40,566	31,191	30.28	1,030
1998	51,792.43	24,871	28,613	23,179	30.58	758
1999	67,795.86	31,959	36,768	31,028	30.54	1,016
2000	74,325.48	34,145	39,282	35,043	30.90	1,134
2001	47,851.29	21,385	24,603	23,248	31.25	744
2002	61,452.25	26,676	30,690	30,762	31.62	973
2003	58,409.71	24,719	28,438	29,972	31.68	946
2004	44,505.72	18,221	20,963	23,543	32.12	733
2005	43,732.91	17,379	19,994	23,739	32.21	737
2006	45,911.39	17,667	20,325	25,586	32.39	790
2007	44,950.76	16,699	19,211	25,740	32.54	791
2008	47,866.22	17,122	19,698	28,168	32.75	860
2009	48,734.28	16,730	19,247	29,487	32.98	894
2010	40,548.47	13,377	15,390	25,158	33.02	762
2011	41,401.39	13,070	15,037	26,364	33.08	797
2012	43,120.96	12,966	14,917	28,204	33.14	851
2013	42,957.95	12,239	14,080	28,878	33.27	868
2014	36,593.84	9,862	11,346	25,248	33.22	760
2015	40,943.32	10,363	11,922	29,021	33.20	874
2016	53,347.48	12,633	14,534	38,813	33.03	1,175
2017	41,588.38	9,116	10,488	31,100	32.94	944

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 382 METER INSTALLATIONS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
2018	42,561.00	8,568	9,857	32,704	32.74	999
2019	46,686.99	8,530	9,813	36,874	32.43	1,137
2020	36,480.92	5,976	6,875	29,606	31.90	928
2021	40,920.80	5,864	6,746	34,175	31.38	1,089
2022	60,560.95	7,388	8,500	52,061	30.59	1,702
2023	47,409.88	4,684	5,389	42,021	29.63	1,418
2024	43,928.62	3,251	3,740	40,189	28.14	1,428
2025	39,341.06	1,818	2,092	37,249	25.78	1,445
2026	222,584.98	6,856	7,887	214,698	23.64	9,082
	3,530,905.96	1,673,024	1,924,742	1,606,164		57,331

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 28.00 1.62

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 384 HOUSE REGULATOR INSTALLATIONS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
1964	0.09					
1966	3,431.14	2,605	3,249	182	18.20	10
1967	4,444.26	3,344	4,171	273	19.50	14
1968	3,271.32	2,439	3,042	229	19.08	12
1969	3,237.71	2,391	2,982	256	19.69	13
1970	5,226.37	3,822	4,767	459	20.86	22
1971	7,129.14	5,160	6,436	693	21.00	33
1972	9,567.65	6,851	8,545	1,023	21.31	48
1973	15,570.46	11,111	13,858	1,712	21.40	80
1974	28,161.36	19,865	24,776	3,385	21.84	155
1975	13,032.46	9,084	11,330	1,702	22.39	76
1976	8,159.45	5,617	7,006	1,153	22.61	51
1977	28,249.93	19,199	23,945	4,305	23.27	185
1978	8,640.95	5,795	7,228	1,413	23.55	60
1979	496.61	331	413	84	21.00	4
1980	6,669.04	4,380	5,463	1,206	24.12	50
1981	14,012.04	9,067	11,308	2,704	24.58	110
1982	11,337.61	7,274	9,072	2,266	24.63	92
1983	17,150.00	10,829	13,506	3,644	25.31	144
1984	16,398.48	10,185	12,703	3,695	25.84	143
1985	17,401.48	10,695	13,339	4,062	25.87	157
1986	19,373.09	11,697	14,589	4,784	26.43	181
1987	18,534.58	11,058	13,792	4,743	26.50	179
1988	20,388.07	11,931	14,880	5,508	27.13	203
1989	19,874.20	11,475	14,312	5,562	27.26	204
1990	14,168.29	8,012	9,993	4,175	27.83	150
1991	16,415.34	9,143	11,403	5,012	28.00	179
1992	13,793.43	7,512	9,369	4,424	28.73	154
1993	17,367.74	9,297	11,595	5,773	28.87	200
1994	13,957.05	7,337	9,151	4,806	29.13	165
1995	12,905.83	6,654	8,299	4,607	29.34	157
1996	18,050.45	9,119	11,373	6,677	29.68	225
1997	31,569.63	15,513	19,348	12,222	30.25	404
1998	21,753.21	10,446	13,028	8,725	30.61	285
1999	33,448.83	15,768	19,666	13,783	30.56	451
2000	37,281.99	17,127	21,361	15,921	30.91	515
2001	25,675.35	11,474	14,311	11,364	31.22	364
2002	33,535.06	14,558	18,157	15,378	31.64	486
2003	31,897.99	13,499	16,836	15,062	31.71	475
2004	23,326.17	9,550	11,911	11,415	32.06	356
2005	22,847.98	9,080	11,325	11,523	32.19	358
2006	24,088.55	9,269	11,560	12,529	32.37	387
2007	24,705.64	9,178	11,447	13,259	32.58	407
2008	26,079.92	9,329	11,635	14,445	32.76	441
2009	25,459.70	8,740	10,901	14,559	33.01	441
2010	21,562.42	7,113	8,871	12,691	33.05	384
2011	21,775.65	6,875	8,575	13,201	33.09	399
2012	21,579.10	6,489	8,093	13,486	33.14	407
2013	19,790.72	5,638	7,032	12,759	33.23	384
2014	19,322.64	5,207	6,494	12,829	33.24	386
2015	22,241.71	5,629	7,021	15,221	33.23	458
2016	29,732.95	7,041	8,782	20,951	33.05	634
2017	22,442.38	4,919	6,135	16,307	32.94	495

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 384 HOUSE REGULATOR INSTALLATIONS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
2018	23,409.37	4,712	5,877	17,532	32.71	536
2019	27,315.12	4,990	6,224	21,091	32.45	650
2020	21,149.46	3,464	4,320	16,829	31.93	527
2021	24,597.11	3,525	4,396	20,201	31.37	644
2022	35,178.24	4,292	5,353	29,825	30.59	975
2023	27,438.08	2,711	3,381	24,057	29.63	812
2024	25,326.69	1,874	2,337	22,990	28.14	817
2025	22,856.48	1,056	1,317	21,539	25.80	835
2026	75,678.89	2,331	2,908	72,771	23.64	3,078
	1,229,482.65	484,676	604,497	624,986		21,247

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 29.40 1.73

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 385 INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R2						
NET SALVAGE PERCENT: 0						
1929	85.00	84	85			
1930	41.40	41	41			
1933	784.76	768	785			
1937	160.99	155	161			
1938	1,446.76	1,392	1,447			
1939	348.89	335	349			
1940	273.63	262	274			
1941	422.16	399	422			
1945	500.64	468	501			
1946	310.90	289	311			
1947	1,430.51	1,326	1,431			
1948	79.68	74	80			
1949	627.50	577	628			
1950	243.55	223	244			
1951	252.04	229	252			
1952	333.11	302	333			
1953	6,046.34	5,448	6,046			
1955	6,834.71	6,136	6,835			
1956	121.19	108	121			
1957	905.25	802	905			
1958	4,754.36	4,186	4,754			
1959	3,635.33	3,178	3,635			
1960	3,396.70	2,948	3,397			
1961	1,065.79	925	1,066			
1962	1,584.02	1,364	1,575	9	9.00	1
1963	4,761.70	4,066	4,695	67	11.17	6
1964	2,535.33	2,146	2,478	57	11.40	5
1965	1,256.16	1,054	1,217	39	13.00	3
1966	35,197.07	29,478	34,041	1,156	11.68	99
1967	34,569.03	28,675	33,114	1,455	12.23	119
1968	42,640.32	35,020	40,441	2,199	12.64	174
1969	60,485.21	49,174	56,786	3,699	13.16	281
1970	54,078.58	43,804	50,585	3,494	13.18	265
1971	49,657.38	39,781	45,939	3,718	13.72	271
1972	28,545.85	22,608	26,108	2,438	14.26	171
1973	31,220.08	24,439	28,222	2,998	14.77	203
1974	32,000.67	24,913	28,769	3,232	14.89	217
1975	20,088.58	15,444	17,835	2,254	15.44	146
1976	17,436.38	13,231	15,279	2,157	15.98	135
1977	12,946.38	9,755	11,265	1,681	16.16	104
1978	42,932.61	31,899	36,837	6,096	16.70	365
1979	48,798.77	35,740	41,272	7,527	17.26	436
1980	64,787.90	46,744	53,980	10,808	17.86	605
1981	50,777.89	36,306	41,926	8,852	18.03	491
1982	78,033.29	54,904	63,403	14,630	18.64	785
1983	27,447.38	18,994	21,934	5,513	19.28	286
1984	72,511.03	49,627	57,309	15,202	19.49	780
1985	87,081.09	58,553	67,617	19,464	20.11	968
1986	237,440.40	156,734	180,996	56,444	20.73	2,723
1987	172,772.21	112,578	130,005	42,767	21.00	2,037
1988	250,045.89	159,729	184,454	65,592	21.63	3,032
1989	298,633.69	186,885	215,814	82,820	22.27	3,719
1990	386,786.33	238,338	275,232	111,554	22.58	4,940

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 385 INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R2						
NET SALVAGE PERCENT: 0						
1991	298,532.85	179,956	207,812	90,721	23.23	3,905
1992	274,910.90	161,950	187,019	87,892	23.89	3,679
1993	327,028.01	189,218	218,508	108,520	24.22	4,481
1994	390,023.23	220,129	254,204	135,819	24.89	5,457
1995	503,011.17	278,215	321,281	181,730	25.25	7,197
1996	666,601.01	358,898	414,454	252,147	25.93	9,724
1997	515,233.51	269,776	311,536	203,698	26.61	7,655
1998	455,092.80	232,689	268,708	186,385	27.00	6,903
1999	502,790.13	249,384	287,987	214,803	27.69	7,757
2000	271,459.36	131,115	151,411	120,048	28.10	4,272
2001	255,041.77	119,130	137,571	117,471	28.81	4,077
2002	615,321.03	279,048	322,243	293,078	29.22	10,030
2003	213,076.73	93,136	107,553	105,524	29.94	3,525
2004	405,637.66	171,504	198,052	207,586	30.38	6,833
2005	141,139.87	57,585	66,499	74,641	30.83	2,421
2006	236,054.55	92,250	106,530	129,525	31.56	4,104
2007	457,449.53	171,727	198,309	259,141	32.03	8,091
2008	348,310.44	125,218	144,601	203,709	32.51	6,266
2009	276,323.25	94,392	109,003	167,320	33.25	5,032
2010	247,427.89	80,414	92,862	154,566	33.75	4,580
2011	213,575.97	65,781	75,964	137,612	34.26	4,017
2012	448,097.83	130,262	150,426	297,672	34.77	8,561
2013	922,829.69	251,933	290,931	631,899	35.29	17,906
2014	311,066.36	79,260	91,529	219,537	35.83	6,127
2015	398,880.78	94,216	108,800	290,081	36.37	7,976
2016	360,835.48	78,770	90,963	269,872	36.70	7,353
2017	312,895.48	62,235	71,869	241,026	37.26	6,469
2018	711,174.31	127,869	147,663	563,511	37.62	14,979
2019	1,021,693.03	163,675	189,011	832,682	38.00	21,913
2020	398,640.04	55,810	64,449	334,191	38.39	8,705
2021	323,261.63	38,694	44,684	278,578	38.61	7,215
2022	102,602.60	10,117	11,683	90,920	38.85	2,340
2023	785,766.62	60,504	69,870	715,897	38.95	18,380
2024	714,541.05	39,228	45,300	669,241	38.73	17,280
2025	968,730.82	30,999	35,797	932,934	37.81	24,674
2026	1,126,280.00	22,526	26,013	1,100,267	36.84	29,866
	18,802,489.79	6,430,251	7,424,326	11,378,164		343,117

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 33.20 1.82

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 390.11 OTHER SMALL STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
1976	1,274.77	1,038	989	286	11.44	25
1984	2,239.23	1,665	1,586	653	14.51	45
1988	908.30	643	613	295	15.53	19
1990	126.18	86	82	44	14.67	3
2000	3,409.12	1,924	1,833	1,576	20.21	78
2001	3,656.82	2,013	1,918	1,739	20.70	84
2010	800.81	329	313	488	23.24	21
2018	5,727.25	1,460	1,391	4,336	24.09	180
2021	80,755.95	14,754	14,057	66,699	23.49	2,839
2025	1,304,025.81	78,242	74,549	1,229,477	19.58	62,792
2026	25,116.34	1,007	959	24,157	17.93	1,347
	1,428,040.58	103,161	98,290	1,329,751		67,433

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 19.70 4.72

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 391.1 OFFICE FURNITURE AND EQUIPMENT - FURNITURE
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 25-SQUARE						
NET SALVAGE PERCENT: 0						
2000	3,243.14	3,243	3,243			
2006	23,544.56	19,071	21,616	1,929	4.75	406
2007	1,840.83	1,417	1,606	235	5.73	41
2008	43,435.12	31,708	35,940	7,495	6.75	1,110
2010	9,808.61	6,376	7,227	2,582	8.75	295
2011	5,186.58	3,164	3,586	1,601	9.76	164
2013	12,460.86	6,604	7,486	4,975	11.76	423
2014	26,836.01	13,150	14,905	11,931	12.75	936
2016	9,333.30	3,827	4,338	4,995	14.73	339
2017	5,476.94	2,026	2,296	3,181	15.75	202
2018	26,642.62	8,792	9,966	16,677	16.74	996
2019	30,278.31	8,781	9,953	20,325	17.75	1,145
2020	21,253.10	5,313	6,022	15,231	18.76	812
2021	6,504.26	1,366	1,548	4,956	19.75	251
2022	11,912.96	2,025	2,296	9,617	20.77	463
2023	29,698.89	3,861	4,376	25,323	21.76	1,164
2026	61,283.88	1,839	2,085	59,199	24.25	2,441
	328,739.97	122,563	138,489	190,251		11,188

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 17.00 3.40

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 391.2 OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 15-SQUARE						
NET SALVAGE PERCENT: 0						
2010	124,216.70	124,217	124,217			
2011	23,261.72	23,262	23,262			
2012	7,178.49	6,820	7,178			
2013	36,982.54	32,668	36,983			
2016	3,101.70	2,119	3,102			
2026	50,232.69	2,512	15,439	34,794	14.25	2,442
	244,973.83	191,598	210,181	34,793		2,442

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 14.20 1.00

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 391.3 OFFICE FURNITURE AND EQUIPMENT - COMPUTERS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 5-SQUARE						
NET SALVAGE PERCENT: 0						
2021	1,119,044.95	1,119,045	1,119,045			
2023	2,592,373.85	1,685,043	1,587,230	1,005,144	1.75	574,368
2024	246,095.08	110,743	104,315	141,780	2.75	51,556
2025	2,211,955.35	552,989	520,889	1,691,066	3.75	450,951
2026	1,571,278.39	235,692	222,011	1,349,267	4.25	317,475
	7,740,747.62	3,703,512	3,553,490	4,187,258		1,394,350

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 3.00 18.01

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 394 TOOLS, SHOP AND GARAGE EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 25-SQUARE						
NET SALVAGE PERCENT: 0						
2000	5,430.78	5,431	5,431			
2001	75,426.35	75,426	75,426			
2002	65,639.79	63,671	63,403	2,237	1.00	2,237
2003	26,498.97	24,644	24,540	1,959	1.75	1,119
2004	141,628.51	126,049	125,519	16,110	2.75	5,858
2005	95,477.20	81,156	80,815	14,662	3.75	3,910
2006	55,377.89	44,856	44,668	10,710	4.75	2,255
2007	72,167.11	55,569	55,335	16,832	5.75	2,927
2008	87,428.76	63,823	63,555	23,874	6.75	3,537
2009	61,254.65	42,266	42,088	19,167	7.75	2,473
2010	59,267.88	38,524	38,362	20,906	8.75	2,389
2011	64,734.21	39,488	39,322	25,412	9.75	2,606
2012	158,725.32	90,473	90,093	68,632	10.75	6,384
2013	80,839.05	42,845	42,665	38,174	11.75	3,249
2014	205,098.35	100,498	100,076	105,022	12.75	8,237
2015	444,762.89	200,143	199,302	245,461	13.75	17,852
2016	174,477.56	71,536	71,235	103,243	14.75	7,000
2017	500,397.48	185,147	184,369	316,028	15.75	20,065
2018	303,590.52	100,185	99,764	203,827	16.75	12,169
2019	364,694.67	105,761	105,317	259,378	17.75	14,613
2020	479,303.99	119,826	119,322	359,982	18.75	19,199
2021	428,877.05	90,064	89,686	339,191	19.75	17,174
2022	1,941,234.68	330,010	328,623	1,612,612	20.75	77,716
2023	752,229.28	97,790	97,379	654,850	21.75	30,108
2024	518,146.80	46,633	46,437	471,710	22.75	20,735
2025	1,188,459.98	59,423	59,173	1,129,287	23.75	47,549
2026	1,946,014.22	58,380	58,135	1,887,879	24.25	77,851
	10,297,183.94	2,359,617	2,350,040	7,947,144		409,212

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 19.40 3.97

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 397 COMMUNICATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2026

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 10-SQUARE						
NET SALVAGE PERCENT: 0						
2016	217,386.34	217,386	217,386			
2017	309,456.84	286,248	277,352	32,105	1.00	32,105
2018	245,841.64	202,819	196,516	49,326	1.75	28,186
2019	231,811.32	168,063	162,840	68,971	2.75	25,080
2020	302,121.56	188,826	182,958	119,164	3.75	31,777
2021	158,338.81	83,128	80,545	77,794	4.75	16,378
2022	327,547.58	139,208	134,882	192,666	5.75	33,507
2023	433,401.15	140,855	136,478	296,923	6.75	43,989
2024	64,958.62	14,616	14,162	50,797	7.75	6,554
2025	1,062,632.59	132,829	128,701	933,932	8.75	106,735
2026	981,546.66	73,616	71,328	910,219	9.25	98,402
	4,335,043.11	1,647,594	1,603,148	2,731,895		422,713

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 6.50 9.75

PART VIII. EXPERIENCED AND ESTIMATED NET SALVAGE

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
EXPERIENCED RETIREMENTS BY ACCOUNT AND ASSOCIATED
COST OF REMOVAL, GROSS SALVAGE AND NET SALVAGE

ACCT	REGULAR RETIREMENTS	COST OF REMOVAL	GROSS SALVAGE	NET SALVAGE
2022	**TRANSACTION YEAR**			
332.00				
334.00	19,360	4,971		(4,971)
366.20				
367.10	4,134	28,764		(28,764)
367.20		198		(198)
369.00	6,408	5,433		(5,433)
374.10	323			
374.20				
375.00	104,271	66,671		(66,671)
376.10	905,488	671,968	24,600	(647,368)
376.20				
378.00	176,772	91,460		(91,460)
380.00	1,711,332	268,818		(268,818)
385.00	15,946	12,608	2	(12,606)
390.11				
TOTAL	**5,853,408**	**1,150,890**	**24,603**	**(1,126,287)**
2023	**TRANSACTION YEAR**			
332.00				
334.00	32,094	1,449		(1,449)
366.20				
367.10	3,394	5,666		(5,666)
367.20	21,245	979		(979)
369.00	36,002	8,681		(8,681)
374.10	3,653	6,697	11,154	4,457
374.20	1,133	457		(457)
375.00	244,170	154,258	50	(154,208)
376.10	1,696,263	859,668	4,017	(855,651)
376.20	5,497	2,272		(2,272)
378.00	225,387	38,866		(38,866)
380.00	1,816,644	274,337		(274,337)
385.00	36,721	10,669		(10,669)
390.11		852		(852)
TOTAL	**6,003,860**	**1,364,851**	**15,221**	**(1,349,630)**
2024	**TRANSACTION YEAR**			
332.00				
334.00	37,849	5,218		(5,218)
366.20	249	1,203		(1,203)
367.10	386,685	57,624		(57,624)
367.20	9,423	219		(219)
369.00	2,510	6,731		(6,731)
374.10	2,952	12,578	(10,169)	(22,747)
374.20				
375.00	63,071	34,622		(34,622)
376.10	1,924,230	1,694,252	16,962	(1,677,291)
376.20	9,148	45		(45)
378.00	186,640	36,322		(36,322)
380.00	1,992,351	359,988		(359,988)
385.00	9,607	49,517	1	(49,516)
390.11				
TOTAL	**7,494,915**	**2,258,317**	**6,794**	**(2,251,523)**
2025	**TRANSACTION YEAR**			

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
EXPERIENCED RETIREMENTS BY ACCOUNT AND ASSOCIATED
COST OF REMOVAL, GROSS SALVAGE AND NET SALVAGE

ACCT	REGULAR RETIREMENTS	COST OF REMOVAL	GROSS SALVAGE	NET SALVAGE
332.00				
334.00	44,208	8,333		(8,333)
366.20				
367.10	284,617	121,648		(121,648)
367.20		455		(455)
369.00	19,585	10,377		(10,377)
374.10	831	2,974		(2,974)
374.20	978	1,597		(1,597)
375.00	55,285	45,561		(45,561)
376.10	2,008,866	1,165,857		(1,165,857)
376.20				
378.00	399,560	99,189		(99,189)
380.00	2,325,865	523,729		(523,729)
385.00	63,849	26,737		(26,737)
390.11				
TOTAL	**8,364,564**	**2,006,455**		**(2,006,455)**
2026	**TRANSACTION YEAR**			
332.00	8,846			
334.00	64,311	10,576		(10,576)
366.20	1,482	445		(445)
367.10	413,983	175,612		(175,612)
367.20	45,998	1,510		(1,510)
369.00	51,385	40,962		(40,962)
374.10	4,300	8,601	546	(8,055)
374.20	68,805	66,948		(66,948)
375.00	56,519	41,040	6	(41,034)
376.10	1,710,842	1,158,076	10,256	(1,147,819)
376.20	17,281	1,356		(1,356)
378.00	47,918	13,133		(13,133)
380.00	1,001,058	189,046		(189,046)
385.00	77,713	48,494	1	(48,493)
390.11				
TOTAL	**3,579,624**	**1,755,799**	**10,809**	**(1,744,990)**
TOTAL	**31,296,372**	**8,536,312**	**57,427**	**(8,478,886)**

NATIONAL FUEL EXHIBIT C

DEPRECIATION STUDY - HTY

2025 DEPRECIATION STUDY

CALCULATED ANNUAL DEPRECIATION
ACCRUALS RELATED TO GAS PLANT
AS OF SEPTEMBER 30, 2025

Prepared by:

GANNETT FLEMING VALUATION AND RATE CONSULTANTS LLC

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
Erie, Pennsylvania

2025 DEPRECIATION STUDY

CALCULATED ANNUAL DEPRECIATION ACCRUALS
RELATED TO GAS PLANT
AS OF SEPTEMBER 30, 2025

GANNETT FLEMING VALUATION AND RATE CONSULTANTS, LLC
Mechanicsburg, Pennsylvania

Gannett Fleming Valuation and Rate Consultants, LLC
(a GFT Company)

300 Sterling Parkway, Suite 200
Mechanicsburg, PA 17050
717.763.7211

January 13, 2026

National Fuel Gas Distribution Corporation
6363 Main Street
Williamsville, NY 14221-5887

Attention Brian M. Welsch
Vice President

Ladies and Gentlemen:

Pursuant to your request, we have determined the annual depreciation accruals applicable to gas plant as of September 30, 2025. Summaries of the original cost, annual accruals and the book depreciation reserve are presented in Tables 1 and 2, beginning on page I-3 of the attached report.

A description of the methods and procedures upon which the study was based is set forth in a companion report, "2026 Depreciation Study - Calculated Annual Depreciation Accruals Related to Gas Plant as of September 30, 2026".

Respectfully submitted,

GANNETT FLEMING VALUATION
AND RATE CONSULTANTS, LLC

JOHN J. SPANOS
President

MELISSA M. HOWARD
Project Manager

084506.000

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PART I. RESULTS OF STUDY

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

PENNSYLVANIA DIVISION

DEPRECIATION STUDY

PART I. RESULTS OF STUDY

DESCRIPTION OF SUMMARY TABULATIONS

The results of the depreciation study are summarized in Table 1, which sets forth the calculated annual depreciation related to Gas Plant in Service as of September 30, 2025. Table 2 presents the experienced gross salvage and cost of removal associated with regular retirements during the five-year period, 2021-2025 and the annual amortization of net salvage.

DETAILED TABULATIONS OF DEPRECIATION CALCULATIONS

The supporting data for the depreciation calculations are presented in account sequence in the section beginning on II-7. The original cost, calculated accrued depreciation, allocated book reserve, future accruals, remaining life and annual accrual are shown for each vintage of each account or subaccount. The amounts of regular retirements, gross salvage and cost of removal are set forth by account for the years 2021 through 2025, on pages III-2 and III-3.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF SEPTEMBER 30, 2025

	DEPRECIABLE GROUP	SURVIVOR CURVE	ORIGINAL COST AS OF SEPTEMBER 30, 2025	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	COMPOSITE REMAINING LIFE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)=(6)/(3)	(8)=(5)/(6)
DEPRECIABLE PLANT								
303	MISCELLANEOUS INTANGIBLE PLANT	10-SQ	24,487,946.38	20,948,041	3,539,905	1,645,363	6.72	2.2
PRODUCTION PLANT								
325.4	RIGHTS OF WAY	70-R4	49,880.62	36,419	13,462	419	0.84	32.1
328	MEASURING AND REGULATING STATION STRUCTURES	30-L2.5	10,095.84	9,957	139	16	0.16	8.7
329	OTHER STRUCTURES	40-SQ	2,650.00	1,384	1,266	68	2.57	18.6
332	FIELD LINES	50-R1.5	444,586.00	169,496	275,090	10,822	2.43	25.4
334	MEASURING AND REGULATING STATION EQUIPMENT	32-O1	3,274,793.21	1,706,176	1,568,618	93,089	2.84	16.9
TOTAL PRODUCTION PLANT			**3,782,005.67**	**1,923,431**	**1,858,575**	**104,414**	**2.76**	
TRANSMISSION PLANT								
365.2	RIGHTS OF WAY	80-R4	2,453,606.71	665,680	1,787,927	30,794	1.26	58.1
366.2	MEASURING AND REGULATING STATION STRUCTURES	60-R2	215,723.34	116,213	99,510	3,830	1.78	26.0
366.3	OTHER STRUCTURES	60-R2	3,811.68	3,637	174	8	0.21	21.8
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	70-R2	62,556,320.47	19,860,314	42,696,007	969,581	1.55	44.0
367.2	MAINS - CATHODIC PROTECTION	27-S2.5	3,785,338.94	2,211,073	1,574,266	113,534	3.00	13.9
369	MEASURING AND REGULATING STATION EQUIPMENT							
	1980 AND PRIOR	30-R0.5	290,199.76	290,200	0	0	-	-
	1981 AND SUBSEQUENT	40-R1.5	7,239,700.81	4,094,495	3,145,206	102,449	1.42	30.7
	TOTAL ACCOUNT 369		7,529,900.57	4,384,695	3,145,206	102,449	1.36	30.7
TOTAL TRANSMISSION PLANT			**76,544,701.71**	**27,241,612**	**49,303,090**	**1,220,196**	**1.59**	
DISTRIBUTION PLANT								
374.2	RIGHTS OF WAY	80-R4	15,094,770.41	3,275,141	11,819,630	193,674	1.28	61.0
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	VARIOUS *	11,456,732.03	5,863,903	5,592,830	363,216	3.17	15.4
375.4	STRUCTURES AND IMPROVEMENTS - SMALL	40-R0.5	815,772.72	320,500	495,273	17,385	2.13	28.5
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	70-L1.5	377,025,040.28	109,664,023	267,361,017	6,646,760	1.76	40.2
376.2	MAINS - CATHODIC PROTECTION	27-S2.5	2,507,932.83	1,684,792	823,141	63,300	2.52	13.0
378	MEASURING AND REGULATING STATION EQUIPMENT	40-R0.5	10,421,765.98	3,971,454	6,450,312	310,366	2.98	20.8
380	SERVICES	55-R0.5	216,577,440.01	83,883,689	132,693,751	4,422,643	2.04	30.0
381	METERS	37-R1.5	16,837,506.89	6,166,777	10,670,730	507,801	3.02	21.0
382	METER INSTALLATIONS	55-R0.5	3,323,679.35	1,888,692	1,434,988	49,895	1.50	28.8
384	HOUSE REGULATOR INSTALLATIONS	55-R0.5	1,159,025.60	590,253	568,773	18,904	1.63	30.1
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	55-R2	17,753,923.12	7,198,874	10,555,049	318,683	1.80	33.1
TOTAL DISTRIBUTION PLANT			**672,973,589.22**	**224,508,098**	**448,465,494**	**12,912,627**	**1.92**	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF SEPTEMBER 30, 2025

	DEPRECIABLE GROUP	SURVIVOR CURVE	ORIGINAL COST AS OF SEPTEMBER 30, 2025	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	COMPOSITE REMAINING LIFE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)=(6)/(3)	(8)=(5)/(6)
GENERAL PLANT								
390.11	OTHER SMALL STRUCTURES	40-R0.5	1,412,106.29	30,192	1,381,914	76,676	5.43	18.0
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	25-SQ	267,456.09	128,890	138,566	8,624	3.22	16.1
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	15-SQ	218,003.15	218,003	0	0	-	-
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	5-SQ	7,472,860.23	3,372,033	4,100,827	1,458,489	19.52	2.8
392	TRANSPORTATION EQUIPMENT		13,402,345.26	6,913,935	6,488,410	1,585,125	**	
394	TOOLS, SHOP AND GARAGE EQUIPMENT	25-SQ	8,426,595.72	2,052,863	6,373,733	335,107	3.98	19.0
396	POWER OPERATED EQUIPMENT AND TOOLS		9,970,754.52	2,822,852	7,147,902	819,021	**	
397	COMMUNICATION EQUIPMENT	10-SQ	4,396,954.45	2,222,231	2,174,724	427,413	9.72	5.1
TOTAL GENERAL PLANT			**45,567,075.71**	**17,760,999**	**27,806,077**	**4,710,455**	**10.34**	
TOTAL DEPRECIABLE GAS PLANT			**823,355,318.69**	**292,382,180**	**530,973,141**	**20,593,055**	**2.50**	
NONDEPRECIABLE PLANT								
	INTANGIBLE PLANT		123,845.54					
	PRODUCTION PLANT		2,840.80					
	TRANSMISSION PLANT		17,652.36					
	DISTRIBUTION PLANT		958,663.92	20,997				
	GENERAL PLANT		52,201.68	(16,289)				
TOTAL NONDEPRECIABLE PLANT			**1,155,204.30**	**4,708**				
TOTAL GAS PLANT			**824,510,522.99**	**292,386,888**	**530,973,141**	**20,593,055**		

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* LIFE SPAN PROCEDURE WAS USED. INTERIM SURVIVOR CURVES ARE 60-S0 AND 40-R0.5.
** ASSETS ARE INDIVIDUALLY DEPRECIATED.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

TABLE 2. AMORTIZATION OF EXPERIENCED NET SALVAGE

	2021		2022		2023		2024		2025			
ACCOUNT	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	NET SALVAGE	SALVAGE ACCRUAL
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)*	(13)=(12)/5
334.00		4,910.71		4,970.85		1,448.50		5,217.60		8,332.68	(24,880.34)	(4,976)
366.20								1,202.58			(1,202.58)	(241)
367.10		117,441.79		28,763.67		5,665.57		57,623.78		121,648.30	(331,143.11)	(66,229)
367.20		219.75		198.09		979.24		219.03		454.86	(2,070.97)	(414)
369.00		15,090.22		5,432.55		8,681.35		6,731.04		10,376.84	(46,312.00)	(9,262)
374.10					11,154.00	6,697.10	(10,168.60)	12,578.00		2,973.56	(21,263.26)	(4,253)
374.20						456.66				1,596.99	(2,053.65)	(411)
375.00		72,182.50		66,671.18	50.00	154,258.11		34,621.65		45,560.60	(373,244.04)	(74,649)
376.10		754,656.81	24,600.36	671,967.90	4,016.83	859,668.17	16,961.74	1,694,252.35		1,165,856.83	(5,100,823.13)	(1,020,165)
376.20		554.72				2,271.96		45.12			(2,871.80)	(574)
378.00		48,112.59		91,460.00		38,865.63		36,321.76		99,188.50	(313,948.48)	(62,790)
380.00		482,041.77		268,817.58		274,336.97		359,987.72		523,728.59	(1,908,912.63)	(381,783)
385.00		13,720.71	2.19	12,608.15		10,669.49	0.96	49,516.78		26,736.86	(113,248.84)	(22,650)
390.00						852.37					(852.37)	(170)
TOTAL	**0.00**	**1,508,931.57**	**24,602.55**	**1,150,889.97**	**15,220.83**	**1,364,851.12**	**6,794.10**	**2,258,317.41**	**0.00**	**2,006,454.61**	**(8,242,827.20)**	**(1,648,567)**

* COLUMN (12) EQUALS THE SUMMATION OF COLUMNS (2) THROUGH (11).

PART II. DETAILED DEPRECIATION CALCULATIONS

CUMULATIVE DEPRECIATED ORIGINAL COST

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
CUMULATIVE DEPRECIATED ORIGINAL COST BY YEAR INSTALLED
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR INST (1)	ORIGINAL COST (2)	ACCRUED DEPRECIATION (3)	AMOUNT (2) - (3) (4)	DEPRECIATED ORIGINAL COST CUMULATIVE AMOUNT (5)	DEPRECIATED ORIGINAL COST PCT OF COL 4 TOTAL (6)
1883	4,328.00	3,757.00	571.00	571.00	
1884	1,465.00	1,297.00	168.00	739.00	
1885	2,543.00	2,185.00	358.00	1,097.00	
1886	20,849.00	18,122.00	2,727.00	3,824.00	
1887	46,992.00	40,287.00	6,705.00	10,529.00	
1888	38,860.00	33,064.00	5,796.00	16,325.00	
1889	493.00	454.00	39.00	16,364.00	
1890	78.00	72.00	6.00	16,370.00	
1891	683.00	600.00	83.00	16,453.00	
1892	1,193.00	1,026.00	167.00	16,620.00	
1893	553.00	470.00	83.00	16,703.00	
1894	314.00	279.00	35.00	16,738.00	
1895	554.00	480.00	74.00	16,812.00	
1896	407.00	363.00	44.00	16,856.00	
1897	373.00	348.00	25.00	16,881.00	
1898	259.00	247.00	12.00	16,893.00	
1899	50,778.00	42,745.00	8,033.00	24,926.00	
1900	10.00	10.00		24,926.00	
1901	844.00	797.00	47.00	24,973.00	
1902	2,793.00	2,651.00	142.00	25,115.00	
1903	3,928.00	3,820.00	108.00	25,223.00	
1904	2,499.00	2,490.00	9.00	25,232.00	
1905	2,609.00	2,535.00	74.00	25,306.00	
1906	2,165.00	2,162.00	3.00	25,309.00	
1907	2,239.00	2,239.00		25,309.00	
1908	1,980.00	1,980.00		25,309.00	
1909	1,680.00	1,656.00	24.00	25,333.00	
1910	1,419.00	1,413.00	6.00	25,339.00	
1911	5,317.00	4,466.00	851.00	26,190.00	
1912	2,952.00	2,544.00	408.00	26,598.00	
1913	2,725.00	2,320.00	405.00	27,003.00	
1914	2,396.00	2,058.00	338.00	27,341.00	
1915	1,485.00	1,390.00	95.00	27,436.00	
1916	193,835.00	171,873.00	21,962.00	49,398.00	
1917	2,899.00	2,492.00	407.00	49,805.00	
1918	9,566.00	9,086.00	480.00	50,285.00	
1919	36,682.00	32,949.00	3,733.00	54,018.00	
1920	10,960.00	9,835.00	1,125.00	55,143.00	
1921	18,246.00	15,231.00	3,015.00	58,158.00	
1922	19,415.00	16,561.00	2,854.00	61,012.00	
1923	11,371.00	9,870.00	1,501.00	62,513.00	
1924	40,166.00	33,241.00	6,925.00	69,438.00	
1925	70,968.00	57,617.00	13,351.00	82,789.00	
1926	124,789.00	98,546.00	26,243.00	109,032.00	
1927	84,631.00	66,738.00	17,893.00	126,925.00	
1928	63,283.00	52,784.00	10,499.00	137,424.00	
1929	93,078.00	74,999.00	18,079.00	155,503.00	
1930	100,350.00	78,583.00	21,767.00	177,270.00	
1931	63,355.00	53,133.00	10,222.00	187,492.00	
1932	29,163.00	23,698.00	5,465.00	192,957.00	
1933	9,989.00	8,504.00	1,485.00	194,442.00	
1934	32,507.00	26,590.00	5,917.00	200,359.00	
1935	45,887.00	37,057.00	8,830.00	209,189.00	
1936	66,728.00	58,313.00	8,415.00	217,604.00	
1937	59,197.00	47,293.00	11,904.00	229,508.00	
1938	55,600.00	43,887.00	11,713.00	241,221.00	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
CUMULATIVE DEPRECIATED ORIGINAL COST BY YEAR INSTALLED
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR INST (1)	ORIGINAL COST (2)	ACCRUED DEPRECIATION (3)	AMOUNT (2) - (3) (4)	DEPRECIATED ORIGINAL COST CUMULATIVE AMOUNT (5)	DEPRECIATED ORIGINAL COST PCT OF COL 4 TOTAL (6)
1939	40,082.00	31,844.00	8,238.00	249,459.00	
1940	29,935.00	23,804.00	6,131.00	255,590.00	
1941	43,511.00	34,594.00	8,917.00	264,507.00	0.10
1942	13,651.00	11,367.00	2,284.00	266,791.00	0.10
1943	99,411.00	95,327.00	4,084.00	270,875.00	0.10
1944	6,817.00	5,624.00	1,193.00	272,068.00	0.10
1945	11,542.00	9,073.00	2,469.00	274,537.00	0.10
1946	45,300.00	35,150.00	10,150.00	284,687.00	0.10
1947	192,933.00	156,428.00	36,505.00	321,192.00	0.10
1948	135,313.00	102,096.00	33,217.00	354,409.00	0.10
1949	229,182.00	167,759.00	61,423.00	415,832.00	0.10
1950	293,463.00	212,726.00	80,737.00	496,569.00	0.10
1951	315,058.00	230,354.00	84,704.00	581,273.00	0.10
1952	229,704.00	172,562.00	57,142.00	638,415.00	0.10
1953	515,918.00	431,186.00	84,732.00	723,147.00	0.10
1954	357,399.00	268,236.00	89,163.00	812,310.00	0.20
1955	1,066,883.00	804,580.00	262,303.00	1,074,613.00	0.20
1956	1,564,297.00	1,221,482.00	342,815.00	1,417,428.00	0.30
1957	774,030.00	610,242.00	163,788.00	1,581,216.00	0.30
1958	289,202.00	210,788.00	78,414.00	1,659,630.00	0.30
1959	562,799.00	420,046.00	142,753.00	1,802,383.00	0.30
1960	350,819.00	270,213.00	80,606.00	1,882,989.00	0.40
1961	403,544.00	303,962.00	99,582.00	1,982,571.00	0.40
1962	365,491.00	275,476.00	90,015.00	2,072,586.00	0.40
1963	519,560.00	387,962.00	131,598.00	2,204,184.00	0.40
1964	619,210.00	450,950.00	168,260.00	2,372,444.00	0.50
1965	1,424,361.00	1,055,413.00	368,948.00	2,741,392.00	0.50
1966	1,728,168.00	1,204,823.00	523,345.00	3,264,737.00	0.60
1967	2,560,044.00	1,839,326.00	720,718.00	3,985,455.00	0.80
1968	1,771,982.00	1,207,042.00	564,940.00	4,550,395.00	0.90
1969	1,984,058.00	1,349,805.00	634,253.00	5,184,648.00	1.00
1970	2,135,439.00	1,471,943.00	663,496.00	5,848,144.00	1.10
1971	2,604,645.00	1,738,465.00	866,180.00	6,714,324.00	1.30
1972	2,545,440.00	1,739,474.00	805,966.00	7,520,290.00	1.50
1973	3,572,114.00	2,445,321.00	1,126,793.00	8,647,083.00	1.70
1974	2,980,278.00	2,012,619.00	967,659.00	9,614,742.00	1.90
1975	2,128,871.00	1,474,577.00	654,294.00	10,269,036.00	2.00
1976	2,256,305.00	1,502,288.00	754,017.00	11,023,053.00	2.10
1977	5,363,461.00	3,480,543.00	1,882,918.00	12,905,971.00	2.50
1978	4,397,320.00	2,780,393.00	1,616,927.00	14,522,898.00	2.80
1979	4,728,505.00	3,176,625.00	1,551,880.00	16,074,778.00	3.10
1980	6,058,246.00	3,885,379.00	2,172,867.00	18,247,645.00	3.50
1981	5,734,515.00	3,670,339.00	2,064,176.00	20,311,821.00	3.90
1982	5,551,010.00	3,462,452.00	2,088,558.00	22,400,379.00	4.30
1983	7,037,660.00	4,349,458.00	2,688,202.00	25,088,581.00	4.80
1984	7,945,230.00	4,767,993.00	3,177,237.00	28,265,818.00	5.50
1985	8,375,295.00	4,914,310.00	3,460,985.00	31,726,803.00	6.10
1986	10,910,522.00	6,465,818.00	4,444,704.00	36,171,507.00	7.00
1987	8,741,330.00	5,095,577.00	3,645,753.00	39,817,260.00	7.70
1988	15,959,071.00	9,251,204.00	6,707,867.00	46,525,127.00	9.00
1989	13,765,538.00	7,846,329.00	5,919,209.00	52,444,336.00	10.10
1990	13,879,378.00	7,758,639.00	6,120,739.00	58,565,075.00	11.30
1991	13,330,014.00	7,175,231.00	6,154,783.00	64,719,858.00	12.50
1992	13,730,971.00	7,235,196.00	6,495,775.00	71,215,633.00	13.80
1993	14,055,926.00	7,353,215.00	6,702,711.00	77,918,344.00	15.10
1994	11,993,836.00	6,128,321.00	5,865,515.00	83,783,859.00	16.20

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
CUMULATIVE DEPRECIATED ORIGINAL COST BY YEAR INSTALLED
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR INST (1)	ORIGINAL COST (2)	ACCRUED DEPRECIATION (3)	AMOUNT (2) - (3) (4)	DEPRECIATED ORIGINAL COST CUMULATIVE AMOUNT (5)	DEPRECIATED ORIGINAL COST PCT OF COL 4 TOTAL (6)
1995	13,533,171.00	6,960,909.00	6,572,262.00	90,356,121.00	17.50
1996	12,642,223.00	6,247,488.00	6,394,735.00	96,750,856.00	18.70
1997	14,552,571.00	7,002,905.00	7,549,666.00	104,300,522.00	20.20
1998	11,722,756.00	5,802,013.00	5,920,743.00	110,221,265.00	21.30
1999	11,924,107.00	5,575,816.00	6,348,291.00	116,569,556.00	22.50
2000	13,423,561.00	7,026,368.00	6,397,193.00	122,966,749.00	23.80
2001	10,307,360.00	4,977,082.00	5,330,278.00	128,297,027.00	24.80
2002	11,674,889.00	4,956,792.00	6,718,097.00	135,015,124.00	26.10
2003	11,405,462.00	4,742,677.00	6,662,785.00	141,677,909.00	27.40
2004	11,195,059.00	4,681,354.00	6,513,705.00	148,191,614.00	28.60
2005	9,533,350.00	3,860,797.00	5,672,553.00	153,864,167.00	29.70
2006	11,247,524.00	4,161,425.00	7,086,099.00	160,950,266.00	31.10
2007	16,132,529.00	5,788,937.00	10,343,592.00	171,293,858.00	33.10
2008	13,101,744.00	4,470,383.00	8,631,361.00	179,925,219.00	34.80
2009	14,019,763.00	4,501,407.00	9,518,356.00	189,443,575.00	36.60
2010	12,604,283.00	4,077,124.00	8,527,159.00	197,970,734.00	38.30
2011	14,923,503.00	5,074,014.00	9,849,489.00	207,820,223.00	40.20
2012	13,494,010.00	3,896,774.00	9,597,236.00	217,417,459.00	42.00
2013	16,639,814.00	4,518,724.00	12,121,090.00	229,538,549.00	44.40
2014	15,358,331.00	3,750,898.00	11,607,433.00	241,145,982.00	46.60
2015	19,415,753.00	5,419,897.00	13,995,856.00	255,141,838.00	49.30
2016	35,995,895.00	19,684,003.00	16,311,892.00	271,453,730.00	52.50
2017	19,364,848.00	4,243,667.00	15,121,181.00	286,574,911.00	55.40
2018	20,214,271.00	3,501,388.00	16,712,883.00	303,287,794.00	58.60
2019	29,204,054.00	4,232,606.00	24,971,448.00	328,259,242.00	63.50
2020	27,689,049.00	4,789,207.00	22,899,842.00	351,159,084.00	67.90
2021	29,536,280.00	3,908,249.00	25,628,031.00	376,787,115.00	72.80
2022	25,758,332.00	3,065,016.00	22,693,316.00	399,480,431.00	77.20
2023	42,735,770.00	3,215,814.00	39,519,956.00	439,000,387.00	84.90
2024	45,201,356.00	1,409,528.00	43,791,828.00	482,792,215.00	93.30
2025	35,655,586.00	1,110,973.00	34,544,613.00	517,336,828.00	100.00
TOTAL	799,982,219.00	282,645,391.00	517,336,828.00		

UTILITY PLANT IN SERVICE

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 303 MISCELLANEOUS INTANGIBLE PLANT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 10-SQUARE						
NET SALVAGE PERCENT: 0						
2000	1,835,295.50	1,835,296	1,835,296			
2001	86,002.52	86,003	86,003			
2004	172,450.99	172,451	172,451			
2005	34,999.69	35,000	35,000			
2011	876,413.25	876,413	876,413			
2012	27,934.56	27,935	27,935			
2013	95,201.98	95,202	95,202			
2014	39,761.48	39,761	39,761			
2015	1,094,952.45	1,094,952	1,094,952			
2016	16,231,676.82	15,014,301	14,986,521	1,245,156	1.00	1,245,156
2017	560,328.17	462,271	461,416	98,912	1.75	56,521
2018	37,961.74	27,522	27,471	10,491	2.75	3,815
2019	59,179.07	36,987	36,919	22,260	3.75	5,936
2020	596,972.41	313,411	312,831	284,141	4.75	59,819
2022	2,595,559.42	843,557	841,996	1,753,563	6.75	259,787
2024	143,256.33	17,907	17,874	125,382	8.75	14,329
	24,487,946.38	20,978,969	20,948,041	3,539,905		1,645,363

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 2.20 6.72

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 325.4 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-R4						
NET SALVAGE PERCENT: 0						
1941	979.89	925	980			
1943	8.00	8	8			
1951	59.95	54	60			
1952	25.68	23	26			
1953	320.75	285	321			
1961	1,304.78	1,090	1,305			
1963	393.12	323	393			
1965	532.75	427	528	5		
1966	1,831.73	1,454	1,797	35	17.50	2
1967	3,547.90	2,790	3,448	100	16.67	6
1970	7.00	5	6	1		
1975	1,108.73	780	964	145	20.71	7
1977	8.00	5	6	2		
1980	13,857.23	8,967	11,082	2,775	24.78	112
1986	743.98	423	523	221	31.57	7
1988	27.06	15	19	8		
1989	1,257.23	670	828	429	33.00	13
1990	18,855.88	9,771	12,076	6,780	32.75	207
1991	2,108.64	1,062	1,312	797	33.21	24
2000	80.77	31	38	43	43.00	1
2012	2,821.55	565	699	2,123	53.08	40
	49,880.62	29,673	36,419	13,462		419

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 32.10 0.84

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 328 MEASURING AND REGULATING STATION STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 30-L2.5						
NET SALVAGE PERCENT: 0						
1941	118.47	118	118			
1955	66.07	64	66			
1963	358.21	337	358			
1964	607.35	569	607			
1965	3,024.98	2,843	3,025			
1966	1,138.05	1,065	1,138			
1967	60.26	56	60			
1969	543.08	501	543			
1974	789.89	717	790			
1978	1,208.10	1,073	1,208			
1985	166.97	141	167			
1994	2,014.41	1,574	1,877	137	8.56	16
	10,095.84	9,058	9,957	139		16

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 8.70 0.16

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 329 OTHER STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 40-SQUARE NET SALVAGE PERCENT: 0						
2004	2,650.00	1,408	1,384	1,266	18.62	68
	2,650.00	1,408	1,384	1,266		68

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 18.60 2.57

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 332 FIELD LINES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 50-R1.5						
NET SALVAGE PERCENT: 0						
1961	704.37	611	520	184	9.68	19
1962	46,641.26	40,415	34,407	12,234	9.74	1,256
1965	6,597.28	5,604	4,771	1,826	10.68	171
1966	3,569.90	3,004	2,557	1,013	11.13	91
1967	10,918.01	9,095	7,743	3,175	11.67	272
1968	27.07	22	19	8	8.00	1
1973	19,237.78	15,279	13,008	6,230	13.54	460
1983	3,679.91	2,597	2,211	1,469	17.70	83
1985	928.10	635	541	387	18.43	21
1986	15,059.66	10,167	8,655	6,405	18.89	339
1993	76,898.79	45,386	38,638	38,261	22.39	1,709
2009	24,009.65	8,466	7,207	16,803	29.85	563
2010	9,505.82	3,189	2,715	6,791	30.18	225
2015	222,831.20	53,903	45,890	176,941	32.12	5,509
2018	3,977.20	721	614	3,363	32.65	103
	444,586.00	199,094	169,496	275,090		10,822

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 25.40 2.43

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 334 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 32-O1						
NET SALVAGE PERCENT: 0						
1947	43.30	43	43			
1958	2,204.71	2,205	2,205			
1964	352.38	345	352			
1965	4,532.46	4,396	4,532			
1966	5,495.81	5,275	5,496			
1967	4,831.67	4,616	4,832			
1969	498.71	468	499			
1971	116.46	107	116			
1973	452.99	409	453			
1974	103.17	92	103			
1975	582.01	515	582			
1976	13,477.89	11,815	13,478			
1977	4,644.11	4,011	4,644			
1978	30,071.42	25,717	30,071			
1979	57,965.26	49,062	57,965			
1980	15,226.49	12,746	15,226			
1981	16,902.26	13,987	16,747	155	9.12	17
1982	29,027.62	23,727	28,408	620	9.69	64
1983	26,695.00	21,543	25,793	902	10.13	89
1984	20,295.52	16,157	19,345	951	10.57	90
1985	64,282.02	50,455	60,409	3,873	11.03	351
1986	32,718.29	25,429	30,446	2,272	11.25	202
1987	61,558.47	47,092	56,383	5,175	11.76	440
1988	43,485.58	32,719	39,174	4,312	12.25	352
1989	51,831.82	38,516	46,115	5,717	12.54	456
1990	25,130.39	18,338	21,956	3,174	13.06	243
1991	51,682.13	37,170	44,503	7,179	13.37	537
1992	18,590.65	13,166	15,764	2,827	13.72	206
1993	39,313.74	27,386	32,789	6,525	14.06	464
1994	40,607.49	27,792	33,275	7,332	14.40	509
1995	20,910.67	14,044	16,815	4,096	14.79	277
1996	2,239.05	1,474	1,765	474	15.29	31
1997	5,584.76	3,613	4,326	1,259	15.35	82
1998	629.20	398	477	152	15.20	10
1999	13,065.82	8,094	9,691	3,375	16.15	209
2000	599.15	363	435	164	16.40	10
2001	72,981.77	43,183	51,702	21,280	16.73	1,272
2002	84,185.12	48,735	58,350	25,835	16.91	1,528
2003	54,155.59	30,484	36,498	17,658	17.28	1,022
2004	54,606.92	29,936	35,842	18,765	17.50	1,072
2005	83,434.71	44,437	53,204	30,231	17.77	1,701
2006	69,280.96	35,874	42,952	26,329	17.94	1,468
2007	141,787.02	70,894	84,881	56,906	18.25	3,118
2008	85,194.79	41,294	49,441	35,754	18.34	1,950
2009	42,981.73	20,047	24,002	18,980	18.59	1,021
2010	40,636.67	18,221	21,816	18,821	18.76	1,003
2011	263,306.14	113,327	135,685	127,621	18.86	6,767
2012	82,559.69	33,916	40,607	41,953	19.01	2,207
2013	214,832.77	84,214	100,828	114,005	19.00	6,000
2014	81,848.58	30,382	36,376	45,473	19.05	2,387
2015	48,538.71	16,964	20,311	28,228	19.09	1,479
2016	85,838.39	28,026	33,555	52,283	19.08	2,740
2017	168,948.46	51,293	61,412	107,536	18.92	5,684

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 334 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 32-O1						
NET SALVAGE PERCENT: 0						
2018	110,165.76	30,670	36,721	73,445	18.79	3,909
2019	91,758.68	23,114	27,674	64,085	18.56	3,453
2020	182,664.25	40,844	48,902	133,762	18.23	7,337
2021	97,102.07	18,780	22,485	74,617	17.73	4,209
2022	20,746.31	3,317	3,971	16,775	17.08	982
2023	101,289.65	12,418	14,868	86,422	16.10	5,368
2024	408.33	32	38	370	14.23	26
2025	289,791.67	15,736	18,842	270,950	13.06	20,747
	3,274,793.21	1,429,423	1,706,176	1,568,618		93,089

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 16.90 2.84

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 365.2 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 80-R4						
NET SALVAGE PERCENT: 0						
1916	10,863.75	10,563	10,864			
1917	33.35	32	33			
1918	913.50	892	914			
1919	42.48	41	42			
1920	3,602.54	3,488	3,603			
1921	138.55	134	139			
1922	150.95	145	151			
1923	165.60	159	166			
1924	39.45	38	39			
1925	121.68	116	122			
1926	432.51	412	433			
1927	0.80	1	1			
1928	1,641.56	1,548	1,642			
1929	698.73	659	699			
1930	647.34	610	647			
1931	53.86	50	54			
1932	427.97	399	428			
1933	46.12	43	46			
1934	845.23	787	845			
1935	43.25	40	43			
1936	329.90	303	326	4	4.00	1
1937	95.15	87	93	2		
1938	364.97	334	359	6	6.00	1
1939	27.45	25	27			
1940	77.75	70	75	3		
1941	935.70	844	907	29	9.67	3
1942	298.99	269	289	10	10.00	1
1943	1,176.47	1,045	1,123	53	10.60	5
1944	54.81	49	53	2		
1945	18.10	16	17	1		
1946	393.50	343	369	24	12.00	2
1947	31.22	27	29	2		
1948	812.68	703	755	58	11.60	5
1949	69.00	59	63	6		
1950	341.68	291	313	29	14.50	2
1951	153.87	130	140	14	14.00	1
1952	236.30	197	212	24	12.00	2
1953	504.76	419	450	55	13.75	4
1954	527.58	432	464	64	16.00	4
1955	692.20	564	606	86	17.20	5
1956	17,020.65	13,673	14,690	2,331	17.01	137
1957	7,927.15	6,330	6,801	1,126	17.32	65
1958	37.25	29	31	6		
1959	792.23	619	665	127	18.14	7
1960	302.77	233	250	53	17.67	3
1961	5,914.70	4,522	4,858	1,057	19.94	53
1962	1,231.96	935	1,005	227	20.64	11
1963	1,887.12	1,410	1,515	372	20.67	18
1964	2,510.75	1,861	1,999	512	21.33	24
1965	21,704.33	15,822	16,999	4,705	22.40	210
1966	7,574.97	5,430	5,834	1,741	23.53	74
1967	19,203.26	13,646	14,661	4,542	23.78	191
1968	1,080.16	754	810	270	24.55	11

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 365.2 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 80-R4						
NET SALVAGE PERCENT: 0						
1969	5,355.71	3,706	3,982	1,374	24.98	55
1970	154.23	105	113	41	20.50	2
1971	9,002.55	6,056	6,506	2,497	26.28	95
1972	803.45	531	570	233	25.89	9
1973	1,236.09	807	867	369	28.38	13
1974	2,778.56	1,780	1,912	867	28.90	30
1975	2,684.37	1,686	1,811	873	30.10	29
1976	70.21	44	47	23	23.00	1
1977	2,698.70	1,641	1,763	936	31.20	30
1978	10,003.07	5,956	6,399	3,604	32.18	112
1979	2,363.44	1,388	1,491	872	32.30	27
1980	6,808.63	3,913	4,204	2,605	33.40	78
1981	22,542.50	12,669	13,611	8,932	34.49	259
1982	8,121.00	4,496	4,830	3,291	35.01	94
1983	5,195.78	2,810	3,019	2,177	35.69	61
1984	19,299.81	10,190	10,948	8,352	36.96	226
1985	3,109.47	1,614	1,734	1,375	37.16	37
1986	18,884.23	9,561	10,272	8,612	38.28	225
1987	28,065.70	13,848	14,878	13,188	39.25	336
1988	169,414.73	81,404	87,458	81,957	40.27	2,035
1989	4,486.43	2,114	2,271	2,215	41.02	54
1990	34,263.40	15,699	16,866	17,397	41.72	417
1991	125,644.90	55,937	60,097	65,548	42.67	1,536
1992	32,118.37	13,882	14,914	17,204	43.66	394
1993	40,130.31	16,823	18,074	22,056	44.65	494
1994	2,729.53	1,117	1,200	1,530	45.00	34
1995	14,973.47	5,934	6,375	8,598	45.98	187
1996	18,230.44	6,986	7,506	10,724	47.04	228
1997	35,101.89	12,991	13,957	21,145	48.06	440
1998	4,201.23	1,500	1,612	2,589	48.85	53
1999	104,843.00	36,056	38,737	66,106	50.08	1,320
2000	726.62	240	258	469	52.11	9
2001	12,929.48	4,139	4,447	8,482	51.41	165
2002	26,479.36	8,127	8,731	17,748	52.51	338
2003	55,642.41	16,342	17,557	38,085	53.49	712
2004	8,200.35	2,300	2,471	5,729	54.56	105
2005	1,674.41	448	481	1,193	56.81	21
2006	1,922.20	488	524	1,398	55.92	25
2007	69,742.90	16,801	18,051	51,692	57.50	899
2008	3,433.57	782	840	2,594	58.95	44
2009	138,528.79	29,714	31,924	106,605	59.52	1,791
2010	37,301.82	7,509	8,067	29,235	60.53	483
2011	21,239.80	3,995	4,292	16,948	61.41	276
2012	13,186.57	2,306	2,478	10,709	62.63	171
2013	30,486.62	4,930	5,297	25,190	63.45	397
2014	117,085.67	17,516	18,819	98,267	63.93	1,537
2015	26,209.10	3,572	3,838	22,371	65.03	344
2016	197,015.92	24,233	26,035	170,981	65.94	2,593
2017	14,629.03	1,605	1,724	12,905	66.87	193
2018	7,388.89	712	765	6,624	68.29	97
2019	351,618.43	29,219	31,392	320,226	68.94	4,645
2020	106,200.01	7,413	7,964	98,236	69.92	1,405
2021	184,280.49	10,412	11,186	173,094	70.94	2,440
2022	11,208.09	484	520	10,688	71.73	149
2023	20,575.17	615	661	19,914	72.95	273

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 365.2 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 80-R4						
NET SALVAGE PERCENT: 0						
2024	10,339.08	172	185	10,154	74.12	137
2025	135,008.13	1,350	1,450	133,558	74.45	1,794
	2,453,606.71	620,296	665,680	1,787,927		30,794

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 58.10 1.26

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 366.2 MEASURING AND REGULATING STATION STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 60-R2						
NET SALVAGE PERCENT: 0						
1916	584.00	581	553	31	1.00	31
1919	250.00	247	235	15	1.25	12
1920	145.00	143	136	9	1.13	8
1922	42.34	42	42			
1925	1,105.35	1,075	1,023	82	2.83	29
1926	493.17	480	457	36	2.77	13
1931	319.07	304	289	30	5.00	6
1933	351.91	334	318	34	4.86	7
1934	614.05	583	555	59	4.92	12
1935	1,397.79	1,312	1,248	150	6.00	25
1936	701.17	657	625	76	5.85	13
1937	490.66	459	437	54	6.00	9
1938	310.45	290	276	34	6.80	5
1940	278.00	256	244	34	6.80	5
1941	34.91	32	30	5	5.00	1
1942	46.98	43	41	6	6.00	1
1945	65.65	60	57	9	9.00	1
1946	340.86	308	293	48	8.00	6
1948	400.28	359	342	58	9.67	6
1949	406.65	363	345	62	8.86	7
1950	391.01	347	330	61	10.17	6
1951	230.70	204	194	37	9.25	4
1952	1,494.21	1,313	1,249	245	10.21	24
1953	252.36	221	210	42	10.50	4
1954	4,450.21	3,868	3,681	769	10.68	72
1955	1,475.19	1,275	1,213	262	10.92	24
1956	8,215.63	7,055	6,713	1,503	11.39	132
1957	5,238.06	4,469	4,253	985	11.73	84
1958	2,766.42	2,344	2,231	535	12.16	44
1959	1,219.39	1,026	976	243	12.79	19
1960	4,973.43	4,154	3,953	1,020	12.91	79
1962	4,205.44	3,458	3,291	914	13.64	67
1963	1,657.30	1,352	1,287	370	14.23	26
1965	10,275.43	8,234	7,835	2,440	14.97	163
1966	9,319.84	7,400	7,042	2,278	15.39	148
1967	6,793.73	5,343	5,084	1,710	15.83	108
1970	1,191.66	909	865	327	17.21	19
1971	2,109.89	1,591	1,514	596	17.53	34
1972	4,301.79	3,207	3,052	1,250	18.12	69
1973	2,005.71	1,478	1,406	600	18.75	32
1974	617.00	452	430	187	18.70	10
1976	1,587.48	1,134	1,079	508	19.54	26
1977	4,958.73	3,493	3,324	1,635	20.19	81
1984	4,902.24	3,114	2,963	1,939	23.65	82
1985	4,896.76	3,055	2,907	1,990	24.27	82
1986	804.29	492	468	336	24.00	14
1987	1,470.86	883	840	631	25.24	25
1988	31,043.90	18,272	17,388	13,656	26.06	524
1991	10,654.57	5,911	5,625	5,030	27.49	183
1999	9,258.38	4,180	3,978	5,280	31.81	166
2000	1,308.51	572	544	765	31.88	24
2003	346.22	136	129	217	36.17	6
2006	2,310.00	805	766	1,544	35.91	43

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 366.2 MEASURING AND REGULATING STATION STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 60-R2						
NET SALVAGE PERCENT: 0						
2012	9,996.65	2,530	2,408	7,589	39.12	194
2013	14,935.43	3,531	3,360	11,575	39.51	293
2014	2,912.00	639	608	2,304	39.72	58
2015	13,537.93	2,733	2,601	10,937	40.51	270
2016	7,722.51	1,422	1,353	6,370	41.10	155
2017	5,149.86	854	813	4,337	41.30	105
2019	4,180.00	541	515	3,665	42.13	87
2021	2,184.33	199	189	1,995	42.45	47
	215,723.34	122,124	116,213	99,510		3,830

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 26.00 1.78

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 366.3 OTHER STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)	
SURVIVOR CURVE: IOWA 60-R2							
NET SALVAGE PERCENT: 0							
1916	15.00	15	15				
1931	35.66	34	36				
1933	264.00	251	264				
1937	128.34	120	128				
1947	196.50	177	196				
1949	182.25	163	182				
1955	592.49	512	592				
1965	852.44	683	852				
1979	1,545.00	1,058	1,372	173	21.63		8
	3,811.68	3,013	3,637	174			8

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 21.80 0.21

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 367.1 MAINS - EXCLUDING CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-R2						
NET SALVAGE PERCENT: 0						
1916	51,381.43	48,838	51,381			
1918	4.79	5	5			
1919	14,238.21	13,464	14,238			
1922	16.17	15	16			
1923	15.07	14	15			
1925	27.81	26	28			
1928	6,672.48	6,100	6,672			
1929	1,946.53	1,780	1,947			
1930	15.06	14	15			
1931	14,122.21	12,778	14,122			
1932	3,655.34	3,306	3,655			
1933	72.83	66	73			
1934	1,941.69	1,736	1,942			
1935	3,380.85	3,021	3,379	2		
1936	16,690.18	14,896	16,661	29	9.67	3
1937	2,176.68	1,921	2,149	28	14.00	2
1938	256.90	226	253	4		
1939	55.46	49	55			
1940	125.95	111	124	2		
1941	2,195.33	1,905	2,131	64	12.80	5
1942	95.70	83	93	3		
1943	93,193.77	80,482	90,020	3,174	13.01	244
1944	79.06	68	76	3		
1945	126.08	107	120	6		
1947	65,673.58	55,501	62,079	3,595	14.32	251
1948	4,714.81	3,970	4,441	274	14.42	19
1949	345.97	288	322	24	12.00	2
1950	10.90	9	10	1		
1951	233.35	192	215	18	18.00	1
1952	12,513.66	10,266	11,483	1,031	16.11	64
1953	299,999.78	242,760	271,530	28,470	17.04	1,671
1954	54,360.06	43,765	48,952	5,408	17.22	314
1955	236,726.16	189,570	212,037	24,689	17.47	1,413
1956	582,272.57	463,722	518,680	63,593	17.70	3,593
1957	98,103.97	77,002	86,128	11,976	18.71	640
1958	6,871.88	5,361	5,996	876	19.04	46
1959	140,064.07	108,564	121,430	18,634	19.21	970
1960	14,087.89	10,848	12,134	1,954	19.54	100
1961	125,908.32	96,270	107,679	18,229	19.77	922
1962	469.94	354	396	74	18.50	4
1963	133,048.04	99,387	111,166	21,882	21.08	1,038
1964	190,561.00	141,225	157,962	32,599	21.40	1,523
1965	541,538.94	398,031	445,203	96,336	21.72	4,435
1966	175,126.25	127,632	142,758	32,368	22.05	1,468
1967	608,062.28	435,677	487,311	120,751	23.05	5,239
1968	49,602.05	35,212	39,385	10,217	23.38	437
1969	199,461.74	140,242	156,863	42,599	23.75	1,794
1970	82,408.79	57,373	64,173	18,236	24.12	756
1971	13,543.93	9,332	10,438	3,106	24.46	127
1972	169,321.09	114,512	128,083	41,238	25.49	1,618
1973	601,020.05	401,962	449,600	151,420	25.88	5,851
1974	3,625.98	2,397	2,681	945	26.25	36
1975	142,644.09	93,175	104,218	38,426	26.68	1,440

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 367.1 MAINS - EXCLUDING CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-R2						
NET SALVAGE PERCENT: 0						
1976	146,999.15	94,844	106,084	40,915	27.08	1,511
1977	185,937.21	118,423	132,458	53,479	27.51	1,944
1978	5,732.61	3,575	3,999	1,734	28.43	61
1979	43,295.29	26,631	29,787	13,508	28.93	467
1980	76,026.87	46,103	51,567	24,460	29.36	833
1981	219,575.19	131,174	146,720	72,855	29.82	2,443
1982	178,191.21	104,812	117,234	60,957	30.28	2,013
1983	592,491.69	342,934	383,576	208,916	30.74	6,796
1984	295,371.30	168,125	188,050	107,321	31.22	3,438
1985	587,450.78	326,270	364,938	222,513	32.22	6,906
1986	620,732.90	338,672	378,809	241,924	32.69	7,401
1987	700,007.70	374,854	419,279	280,729	33.18	8,461
1988	3,695,017.01	1,940,623	2,170,614	1,524,403	33.67	45,275
1989	2,575,981.49	1,326,115	1,483,278	1,092,703	34.17	31,978
1990	2,859,916.56	1,441,684	1,612,544	1,247,373	34.68	35,968
1991	1,295,459.15	638,920	714,641	580,818	35.19	16,505
1992	1,750,303.30	843,821	943,826	806,477	35.72	22,578
1993	435,219.51	204,901	229,185	206,035	36.25	5,684
1994	664,975.67	303,362	339,315	325,661	37.25	8,743
1995	301,997.99	134,299	150,215	151,783	37.78	4,018
1996	553,514.26	239,616	268,014	285,500	38.32	7,450
1997	270,745.99	113,957	127,462	143,284	38.87	3,686
1998	497,190.08	203,251	227,339	269,851	39.41	6,847
1999	360,687.86	142,977	159,922	200,766	39.97	5,023
2001	71,327.78	26,463	29,599	41,729	41.11	1,015
2002	169,398.99	60,645	67,832	101,567	41.69	2,436
2003	120,119.31	41,693	46,634	73,485	41.85	1,756
2004	272,661.21	90,960	101,740	170,921	42.45	4,026
2005	85,827.88	27,465	30,720	55,108	43.05	1,280
2006	165,837.26	50,763	56,779	109,058	43.64	2,499
2007	1,360,805.32	397,355	444,447	916,358	44.25	20,709
2008	185,943.29	51,636	57,756	128,187	44.87	2,857
2009	240,321.93	63,661	71,206	169,116	45.10	3,750
2010	179,551.84	44,906	50,228	129,324	45.73	2,828
2011	520,588.70	122,390	136,895	383,694	46.36	8,276
2012	498,273.63	110,268	123,336	374,938	46.63	8,041
2013	383,551.42	78,935	88,290	295,261	47.27	6,246
2014	2,386,790.71	456,354	510,438	1,876,353	47.58	39,436
2015	1,634,838.14	288,222	322,380	1,312,458	47.89	27,406
2016	668,106.97	106,897	119,566	548,541	48.55	11,298
2017	2,659,994.21	384,103	429,625	2,230,369	48.89	45,620
2018	2,231,554.43	287,871	321,988	1,909,566	48.93	39,026
2019	8,582,283.73	965,507	1,079,933	7,502,351	49.31	152,147
2020	2,807,398.74	269,791	301,765	2,505,634	49.39	50,732
2021	5,424,971.64	428,573	479,365	4,945,607	49.52	99,871
2022	931,226.41	57,550	64,370	866,856	49.38	17,555
2024	6,916,231.02	176,364	197,266	6,718,965	47.77	140,652
2025	381,088.42	6,059	6,777	374,312	46.42	8,064
	62,556,320.47	17,759,984	19,860,314	42,696,007		969,581

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 44.00 1.55

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 367.2 MAINS - CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 27-S2.5						
NET SALVAGE PERCENT: 0						
1965	397.82	398	398			
1966	1,351.32	1,351	1,351			
1968	6,038.60	6,039	6,039			
1969	1,612.73	1,613	1,613			
1973	1,204.06	1,195	1,204			
1975	64,739.43	64,086	64,739			
1976	1,650.00	1,625	1,650			
1977	13,715.68	13,435	13,716			
1981	2,932.25	2,828	2,932			
1983	81,763.32	78,068	81,763			
1984	9,247.84	8,774	9,248			
1985	96,340.87	90,734	95,690	651	2.49	261
1986	625.00	586	618	7	2.33	3
1987	6,724.70	6,276	6,619	106	2.72	39
1988	60,767.87	56,137	59,203	1,565	3.07	510
1989	1,000.00	921	971	29	3.22	9
1992	1,499.00	1,346	1,420	79	3.76	21
1993	5,399.03	4,788	5,050	349	4.11	85
1996	4,740.23	4,062	4,284	456	4.90	93
1998	473,793.69	395,049	416,626	57,168	5.43	10,528
1999	175,245.54	143,526	151,365	23,881	5.80	4,117
2001	412,760.69	325,297	343,064	69,697	6.52	10,690
2003	142,581.13	107,221	113,077	29,504	7.34	4,020
2004	316,864.97	232,294	244,981	71,884	7.74	9,287
2005	109,193.73	77,615	81,854	27,340	8.24	3,318
2006	48,522.01	33,441	35,268	13,254	8.68	1,527
2011	121,039.00	66,402	70,029	51,010	11.72	4,352
2013	46,315.85	22,296	23,514	22,802	13.20	1,727
2014	44,744.68	19,934	21,023	23,722	14.00	1,694
2015	269,872.63	110,378	116,406	153,467	14.81	10,362
2016	10,401.37	3,867	4,078	6,323	15.61	405
2017	2,884.49	961	1,013	1,871	16.56	113
2018	196,966.48	57,987	61,154	135,812	17.38	7,814
2019	33,470.16	8,515	8,980	24,490	18.32	1,337
2020	249,591.73	53,463	56,383	193,209	19.26	10,032
2021	210,008.29	36,415	38,404	171,604	20.26	8,470
2022	310,555.18	41,273	43,528	267,027	21.20	12,596
2023	209,145.44	19,241	20,292	188,853	22.20	8,507
2024	11,262.66	576	607	10,656	23.22	459
2025	28,369.47	871	919	27,451	23.71	1,158
	3,785,338.94	2,100,884	2,211,073	1,574,266		113,534

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 13.90 3.00

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 369 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
1980 AND PRIOR						
SURVIVOR CURVE: IOWA 30-R0.5						
NET SALVAGE PERCENT: 0						
1919	22.66	23	23			
1920	16.28	16	16			
1922	53.70	54	54			
1928	12.88	13	13			
1930	47.70	48	48			
1934	29.72	30	30			
1935	196.61	197	197			
1936	62.67	63	63			
1937	312.09	312	312			
1938	65.81	66	66			
1939	66.58	67	67			
1943	43.93	44	44			
1945	305.90	306	306			
1946	846.49	846	846			
1947	154.83	155	155			
1949	43.00	43	43			
1950	338.72	339	339			
1951	863.22	863	863			
1952	87.35	87	87			
1954	1,714.87	1,715	1,715			
1955	1,446.82	1,447	1,447			
1956	3,902.55	3,903	3,903			
1957	19,574.22	19,574	19,574			
1958	1,881.17	1,881	1,881			
1959	7,856.11	7,856	7,856			
1960	4,354.64	4,355	4,355			
1961	135.54	136	136			
1962	2,556.01	2,556	2,556			
1963	9,017.26	9,017	9,017			
1964	1,542.98	1,543	1,543			
1965	25,466.91	25,450	25,467			
1966	6,431.04	6,352	6,431			
1967	27,222.03	26,442	27,222			
1968	19,375.95	18,510	19,376			
1969	8,598.15	8,079	8,598			
1970	6,913.15	6,390	6,913			
1971	1,436.60	1,306	1,437			
1972	4,360.88	3,903	4,361			
1973	19,144.38	16,860	19,144			
1974	12,199.83	10,577	12,200			
1975	6,527.23	5,570	6,527			
1976	18,412.70	15,467	18,413			
1977	24,984.16	20,654	24,984			
1978	27,991.44	22,766	27,991			
1979	8,283.13	6,627	8,283			
1980	15,299.87	12,041	15,300			
	290,199.76	264,549	290,200			

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 369 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
1981 AND SUBSEQUENT						
SURVIVOR CURVE: IOWA 40-R1.5						
NET SALVAGE PERCENT: 0						
1981	16,635.26	12,069	16,635			
1982	21,392.55	15,296	21,393			
1983	48,032.86	33,815	48,033			
1984	39,221.67	27,181	39,222			
1985	41,242.15	28,107	41,242			
1986	272,634.31	182,597	272,634			
1987	106,496.31	70,021	106,496			
1988	429,662.57	277,132	429,663			
1989	307,270.90	194,272	302,050	5,221	14.71	355
1990	177,873.14	110,103	171,186	6,687	15.23	439
1991	103,256.56	62,548	97,248	6,008	15.77	381
1992	127,165.22	75,250	116,997	10,168	16.32	623
1993	276,992.49	160,032	248,815	28,178	16.89	1,668
1994	119,760.55	67,485	104,924	14,836	17.45	850
1995	464,681.22	254,994	396,459	68,222	18.05	3,780
1996	61,230.93	32,682	50,813	10,418	18.64	559
1997	150,727.95	78,152	121,509	29,219	19.26	1,517
1998	109,838.14	55,249	85,900	23,938	19.88	1,204
1999	134,231.14	65,404	101,689	32,542	20.51	1,587
2000	7,430.46	3,500	5,442	1,989	21.16	94
2001	164,637.18	74,869	116,405	48,232	21.81	2,211
2002	126,878.11	55,604	86,452	40,426	22.47	1,799
2003	15,317.95	6,453	10,033	5,285	23.18	228
2004	12,742.99	5,151	8,009	4,734	23.79	199
2005	13,104.98	5,072	7,886	5,219	24.50	213
2006	7,048.33	2,604	4,049	3,000	25.21	119
2007	58,286.49	20,502	31,876	26,410	25.92	1,019
2008	56,753.51	18,956	29,472	27,281	26.64	1,024
2009	131,494.19	41,552	64,604	66,890	27.36	2,445
2010	190,825.52	56,771	88,266	102,559	28.10	3,650
2011	103,687.67	28,955	45,019	58,669	28.83	2,035
2012	41,531.17	10,819	16,821	24,710	29.59	835
2013	872,718.18	210,980	328,027	544,691	30.33	17,959
2014	35,075.97	7,822	12,161	22,914	31.09	737
2015	447,086.14	91,094	141,631	305,455	31.85	9,590
2016	332,761.56	61,478	95,585	237,177	32.61	7,273
2017	60,129.26	9,936	15,448	44,681	33.39	1,338
2018	119,015.80	17,347	26,971	92,045	34.17	2,694
2019	44,518.22	5,620	8,738	35,780	34.94	1,024
2020	574,827.87	61,075	94,958	479,870	35.75	13,423
2021	409,299.29	35,404	55,045	354,254	36.54	9,695
2022	224,572.85	14,878	23,132	201,441	37.35	5,393
2023	20,845.33	959	1,491	19,354	38.17	507
2024	11,910.00	307	477	11,433	39.02	293
2025	148,855.87	2,307	3,587	145,269	39.38	3,689
	7,239,700.81	2,652,404	4,094,495	3,145,206		102,449
	7,529,900.57	2,916,953	4,384,695	3,145,206		102,449

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 30.70 1.36

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 374.2 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 80-R4						
NET SALVAGE PERCENT: 0						
1884	105.00	105	105			
1885	57.84	58	58			
1886	152.57	153	153			
1887	19.28	19	19			
1888	90.08	90	90			
1889	150.13	150	150			
1903	7.00	7	7			
1908	35.00	35	35			
1913	34.10	34	34			
1915	1.75	2	2			
1916	6,222.08	6,050	6,222			
1917	104.00	101	104			
1918	603.75	589	604			
1919	815.46	788	815			
1920	478.56	463	479			
1921	418.37	406	418			
1922	792.07	761	792			
1923	543.93	523	544			
1924	870.58	829	871			
1925	1,513.28	1,441	1,513			
1926	808.05	770	808			
1927	814.48	776	814			
1928	1,766.31	1,666	1,766			
1929	1,083.06	1,022	1,083			
1930	992.08	936	992			
1931	900.28	840	898	2		
1932	608.79	568	607	2		
1933	806.39	751	803	3		
1934	926.55	862	922	5	5.00	1
1935	2,808.02	2,585	2,765	43	7.17	6
1936	1,936.62	1,780	1,904	33	8.25	4
1937	2,075.07	1,904	2,036	39	7.80	5
1938	2,485.58	2,277	2,435	51	8.50	6
1939	2,422.55	2,194	2,346	77	8.56	9
1940	2,303.44	2,081	2,226	77	9.63	8
1941	1,951.83	1,760	1,882	70	8.75	8
1942	808.23	727	778	30	10.00	3
1943	341.02	303	324	17	8.50	2
1944	443.41	393	420	23	11.50	2
1945	399.28	352	376	23	11.50	2
1946	794.64	693	741	54	10.80	5
1947	1,570.64	1,364	1,459	112	12.44	9
1948	1,579.39	1,366	1,461	118	11.80	10
1949	4,806.63	4,105	4,390	417	13.03	32
1950	4,569.29	3,885	4,155	414	13.35	31
1951	3,585.82	3,035	3,246	340	13.60	25
1952	2,784.44	2,325	2,487	297	14.14	21
1953	3,659.36	3,041	3,252	407	14.54	28
1954	3,197.16	2,620	2,802	395	15.80	25
1955	19,330.19	15,752	16,846	2,484	15.92	156
1956	19,743.19	15,860	16,962	2,781	16.96	164
1957	15,148.19	12,096	12,936	2,212	17.28	128
1958	15,254.48	12,002	12,836	2,418	18.18	133

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 374.2 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 80-R4						
NET SALVAGE PERCENT: 0						
1959	10,605.00	8,291	8,867	1,738	18.49	94
1960	13,739.17	10,579	11,314	2,425	19.56	124
1961	16,950.17	12,960	13,860	3,090	19.81	156
1962	19,226.46	14,593	15,607	3,619	20.11	180
1963	13,385.67	9,999	10,694	2,692	21.03	128
1964	14,889.61	11,035	11,802	3,088	21.44	144
1965	18,066.38	13,170	14,085	3,981	22.37	178
1966	20,331.71	14,576	15,589	4,743	23.36	203
1967	20,922.79	14,868	15,901	5,022	23.69	212
1968	29,594.67	20,669	22,105	7,490	24.72	303
1969	14,261.48	9,868	10,554	3,707	25.05	148
1970	21,453.87	14,580	15,593	5,861	26.05	225
1971	40,382.46	27,165	29,052	11,330	26.41	429
1972	13,135.86	8,674	9,277	3,859	27.37	141
1973	26,202.73	17,113	18,302	7,901	27.72	285
1974	12,157.54	7,788	8,329	3,829	28.79	133
1975	5,904.10	3,708	3,966	1,938	29.82	65
1976	10,983.86	6,817	7,291	3,693	30.02	123
1977	13,509.94	8,214	8,785	4,725	31.09	152
1978	30,338.18	18,063	19,318	11,020	32.13	343
1979	37,995.35	22,318	23,868	14,127	32.48	435
1980	45,117.22	25,929	27,730	17,387	33.50	519
1981	66,718.07	37,496	40,101	26,617	34.48	772
1982	48,821.32	27,027	28,904	19,917	34.88	571
1983	59,798.03	32,339	34,586	25,212	35.86	703
1984	56,479.52	29,821	31,893	24,587	36.86	667
1985	110,082.03	57,155	61,125	48,957	37.26	1,314
1986	83,758.81	42,407	45,353	38,406	38.25	1,004
1987	115,526.77	57,001	60,961	54,566	39.26	1,390
1988	129,061.72	62,014	66,322	62,740	40.27	1,558
1989	140,657.30	66,278	70,882	69,775	40.69	1,715
1990	198,673.83	91,032	97,356	101,318	41.68	2,431
1991	191,499.11	85,255	91,177	100,322	42.67	2,351
1992	152,993.96	66,124	70,717	82,277	43.67	1,884
1993	207,212.13	86,863	92,897	114,315	44.67	2,559
1994	213,156.21	87,266	93,328	119,828	45.08	2,658
1995	201,179.45	79,727	85,265	115,914	46.09	2,515
1996	243,028.45	93,129	99,599	143,429	47.09	3,046
1997	253,609.59	93,861	100,381	153,229	48.08	3,187
1998	192,052.61	68,563	73,326	118,727	49.08	2,419
1999	209,008.41	71,878	76,871	132,137	50.07	2,639
2000	219,277.60	72,537	77,576	141,702	51.08	2,774
2001	276,090.40	88,377	94,516	181,574	51.51	3,525
2002	181,401.46	55,672	59,539	121,862	52.50	2,321
2003	212,415.96	62,387	66,721	145,695	53.51	2,723
2004	294,283.50	82,547	88,281	206,002	54.51	3,779
2005	282,250.42	75,446	80,687	201,563	55.51	3,631
2006	212,960.74	54,113	57,872	155,089	56.52	2,744
2007	277,082.46	66,749	71,386	205,696	57.51	3,577
2008	260,988.91	59,427	63,555	197,434	58.52	3,374
2009	223,601.41	47,963	51,295	172,306	59.52	2,895
2010	269,599.50	54,270	58,040	211,560	60.51	3,496
2011	303,972.12	57,177	61,149	242,823	61.51	3,948
2012	276,118.35	48,293	51,648	224,470	62.51	3,591
2013	330,112.30	53,379	57,087	273,025	63.51	4,299

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 374.2 RIGHTS OF WAY
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 80-R4						
NET SALVAGE PERCENT: 0						
2014	431,279.04	64,519	69,001	362,278	63.94	5,666
2015	466,553.84	63,591	68,009	398,545	64.94	6,137
2016	452,917.62	55,709	59,579	393,339	65.94	5,965
2017	465,006.60	51,011	54,555	410,452	66.94	6,132
2018	518,914.31	50,023	53,498	465,416	67.94	6,850
2019	1,176,975.02	97,807	104,602	1,072,373	68.94	15,555
2020	657,597.13	45,900	49,089	608,508	69.94	8,700
2021	573,945.57	32,428	34,681	539,265	70.94	7,602
2022	671,462.11	29,007	31,022	640,440	71.94	8,902
2023	608,599.60	18,197	19,461	589,139	72.94	8,077
2024	746,495.13	12,392	13,253	733,242	73.94	9,917
2025	1,246,678.48	12,467	13,333	1,233,346	74.44	16,568
	15,094,770.41	3,062,896	3,275,141	11,819,630		193,674

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 61.00 1.28

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 375.3 STRUCTURES AND IMPROVEMENTS - LARGE
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
ELK SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2040						
NET SALVAGE PERCENT: 0						
1970	101,615.79	77,461	90,800	10,816	12.48	867
1972	872.15	660	774	98	12.25	8
1975	397.62	297	348	49	12.25	4
1980	5,938.40	4,344	5,092	846	12.82	66
1981	866.58	631	740	127	12.70	10
1988	944.53	659	772	172	13.23	13
1990	7,780.00	5,353	6,275	1,505	13.32	113
1992	7,147.93	4,838	5,671	1,477	13.31	111
1993	12,411.95	8,328	9,762	2,650	13.38	198
1996	2,932.90	1,910	2,239	694	13.35	52
1997	91,997.01	59,261	69,466	22,531	13.49	1,670
1999	81.08	51	60	21	10.50	2
2000	6,956.95	4,317	5,060	1,897	13.55	140
2004	3,780.97	2,202	2,581	1,200	13.64	88
2005	80,474.20	45,978	53,895	26,579	13.73	1,936
2006	3,790.93	2,120	2,485	1,306	13.75	95
2008	8,450.00	4,510	5,287	3,163	13.81	229
2010	31,121.00	15,694	18,396	12,725	13.89	916
2011	12,389.14	6,047	7,088	5,301	13.91	381
2014	33,265.48	14,345	16,815	16,450	14.02	1,173
2015	10,797.30	4,418	5,179	5,619	14.05	400
2016	4,733.61	1,822	2,136	2,598	14.12	184
2017	10,408.19	3,737	4,381	6,028	14.12	427
2018	13,025.65	4,297	5,037	7,989	14.16	564
2019	6,242.90	1,866	2,187	4,056	14.18	286
2024	38,929.18	3,088	3,620	35,309	14.39	2,454
2025	95,168.56	4,645	5,445	89,724	14.42	6,222
	592,520.00	282,879	331,590	260,930		18,609
DUBOIS SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2037						
NET SALVAGE PERCENT: 0						
1967	80,715.66	65,003	76,197	4,519	10.22	442
1969	27.09	22	26	1		
1976	1,655.47	1,298	1,522	134	10.31	13
1978	6,016.00	4,684	5,491	525	10.50	50
1980	2,081.36	1,608	1,885	196	10.32	19
1984	1,452.26	1,102	1,292	160	10.67	15
1986	1,466.30	1,101	1,291	176	11.00	16
1991	5,628.85	4,101	4,807	822	10.82	76
1993	19,099.51	13,716	16,078	3,022	10.87	278
1996	4,082.54	2,859	3,351	731	10.91	67
1997	13,613.93	9,445	11,071	2,542	10.96	232
1999	81.07	55	64	17	8.50	2
2000	20,579.25	13,822	16,202	4,377	11.03	397
2002	26,356.07	17,255	20,226	6,130	11.06	554
2003	21,650.94	13,974	16,380	5,271	11.07	476
2005	775.00	484	567	208	10.95	19

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YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
DUBOIS SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2037						
NET SALVAGE PERCENT: 0						
2008	5,099.64	3,003	3,520	1,580	11.21	141
2012	2,022.28	1,065	1,248	774	11.22	69
2013	12,349.08	6,269	7,349	5,001	11.29	443
2014	39,062.33	19,026	22,302	16,760	11.30	1,483
2016	20,527.11	9,016	10,569	9,959	11.36	877
2018	9,545.21	3,643	4,270	5,275	11.39	463
2019	3,427.78	1,191	1,396	2,032	11.42	178
2020	79,894.36	24,735	28,994	50,900	11.44	4,449
2021	5,966.32	1,588	1,861	4,105	11.47	358
2022	5,191.35	1,131	1,326	3,866	11.51	336
2024	15,105.99	1,465	1,717	13,389	11.55	1,159
2025	53,102.95	3,192	3,742	49,361	11.57	4,266
	456,575.70	225,853	264,745	191,831		16,878
MEADVILLE SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2037						
NET SALVAGE PERCENT: 0						
1962	50,342.77	41,031	48,097	2,246	10.03	224
1963	12,243.25	9,955	11,669	574	10.07	57
1974	940.15	742	870	70	10.00	7
1980	4,336.66	3,350	3,927	410	10.51	39
1984	3,117.80	2,366	2,773	344	10.75	32
1988	6,098.81	4,530	5,310	789	10.81	73
1989	2,400.00	1,772	2,077	323	10.77	30
1991	5,750.00	4,189	4,910	840	10.91	77
1993	6,060.92	4,353	5,103	958	10.89	88
1994	5,353.23	3,814	4,471	882	10.89	81
1998	34,149.82	23,455	27,494	6,656	10.98	606
1999	241.07	164	192	49	12.25	4
2000	59,583.52	40,018	46,909	12,674	11.02	1,150
2001	33,076.87	21,944	25,723	7,354	11.04	666
2006	9,202.23	5,648	6,621	2,582	11.13	232
2007	3,050.00	1,835	2,151	899	11.10	81
2008	6,989.58	4,116	4,825	2,165	11.16	194
2009	23,307.80	13,401	15,709	7,599	11.21	678
2010	4,428.08	2,480	2,907	1,521	11.18	136
2012	9,796.54	5,158	6,046	3,750	11.26	333
2013	24,548.17	12,462	14,608	9,940	11.28	881
2014	7,006.38	3,413	4,001	3,006	11.30	266
2016	8,839.99	3,883	4,552	4,288	11.34	378
2017	1,335.56	550	645	691	11.33	61
2020	30,990.81	9,595	11,247	19,744	11.44	1,726
2022	62,682.13	13,655	16,006	46,676	11.49	4,062
2023	52,740.23	8,521	9,988	42,752	11.52	3,711
2024	135,063.19	13,094	15,349	119,714	11.55	10,365
2025	11,609.14	698	818	10,791	11.57	933
	615,284.70	260,192	304,997	310,288		27,171

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YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
CLARION SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2036						
NET SALVAGE PERCENT: 0						
1936	9,903.31	8,580	9,903			
1937	2,759.12	2,386	2,759			
1938	210.94	182	211			
1939	582.38	502	582			
1944	10.39	9	10			
1945	326.86	279	327			
1950	321.44	272	319	2		
1952	433.28	365	428	5	5.00	1
1953	332.05	279	327	5	5.00	1
1954	69.30	58	68	1		
1955	275.00	231	271	4		
1962	856.57	709	832	24	8.00	3
1963	83.47	69	81	2		
1965	199.63	164	192	7	7.00	1
1966	177.21	145	170	7	7.00	1
1967	242.55	198	232	10	10.00	1
1968	1,416.69	1,157	1,358	59	9.83	6
1973	6,609.18	5,325	6,250	359	9.70	37
1975	530.69	425	499	32	10.67	3
1981	33,569.89	26,328	30,900	2,670	9.82	272
1982	22,711.57	17,740	20,821	1,891	9.80	193
1990	12,655.51	9,496	11,145	1,510	10.00	151
1993	9,346.08	6,876	8,070	1,276	10.05	127
1994	6,506.60	4,751	5,576	931	10.01	93
1996	1,000.00	719	844	156	10.40	15
2003	11,593.30	7,715	9,055	2,538	10.19	249
2005	13,549.81	8,743	10,261	3,288	10.24	321
2009	19,507.78	11,639	13,660	5,847	10.29	568
2012	1,698.49	931	1,093	606	10.27	59
2014	21,300.79	10,837	12,719	8,582	10.38	827
2017	3,843.90	1,665	1,954	1,890	10.44	181
2018	7,749.73	3,118	3,659	4,090	10.46	391
2019	12,074.65	4,438	5,209	6,866	10.48	655
2024	93,979.93	9,851	11,562	82,418	10.59	7,783
2025	36,556.02	2,416	2,836	33,720	10.60	3,181
	332,984.11	148,598	174,186	158,798		15,120
ERIE SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2035						
NET SALVAGE PERCENT: 0						
1947	236.25	203	236			
1957	134,862.55	114,274	133,952	911	8.44	108
1961	423.30	356	417	6	6.00	1
1962	148.51	125	147	2		
1966	201.20	168	197	4		
1967	96.43	80	94	3		
1968	1,770.34	1,469	1,722	48	8.00	6
1969	500.00	414	485	15	7.50	2

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ERIE SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2035						
NET SALVAGE PERCENT: 0						
1970	229.33	189	222	8	8.00	1
1971	7,042.51	5,805	6,805	238	8.81	27
1972	49,166.57	40,429	47,391	1,776	8.79	202
1973	9,678.83	7,938	9,305	374	8.90	42
1977	36,233.84	29,380	34,439	1,795	8.89	202
1978	16,827.85	13,605	15,948	880	8.89	99
1979	3,123.32	2,517	2,950	173	9.11	19
1983	74,357.79	59,044	69,211	5,146	9.00	572
1984	9,992.53	7,901	9,262	731	9.02	81
1987	2,479.34	1,935	2,268	211	9.17	23
1989	15,219.64	11,756	13,780	1,439	9.11	158
1990	205,165.94	157,584	184,720	20,446	9.11	2,244
1991	14,509.49	11,081	12,989	1,520	9.10	167
1993	27,393.57	20,659	24,216	3,177	9.16	347
1994	3,511.43	2,629	3,082	430	9.15	47
1995	11,772.42	8,753	10,260	1,512	9.16	165
1996	24,450.85	18,035	21,141	3,310	9.19	360
1997	64,477.75	47,175	55,299	9,179	9.21	997
1998	113,089.84	82,021	96,145	16,945	9.22	1,838
1999	40,303.36	28,950	33,935	6,368	9.24	689
2000	16,952.86	12,057	14,133	2,820	9.25	305
2001	3,357.11	2,361	2,768	590	9.22	64
2002	8,675.02	6,032	7,071	1,604	9.27	173
2003	8,065.31	5,539	6,493	1,572	9.30	169
2005	4,994.72	3,333	3,907	1,088	9.30	117
2006	34,812.67	22,854	26,789	8,023	9.34	859
2009	1,558.62	966	1,132	426	9.47	45
2011	1,822.48	1,074	1,259	564	9.40	60
2012	2,076.71	1,189	1,394	683	9.36	73
2013	26,847.78	14,853	17,411	9,437	9.44	1,000
2016	1,690.00	820	961	729	9.47	77
2017	5,182.34	2,369	2,777	2,405	9.51	253
2018	15,476.18	6,594	7,729	7,747	9.51	815
2019	156,166.24	60,949	71,444	84,722	9.53	8,890
2020	122,230.35	42,768	50,133	72,098	9.55	7,550
2021	29,341.93	8,905	10,438	18,903	9.57	1,975
2022	754,627.80	189,396	222,010	532,618	9.58	55,597
2023	21,835.08	4,116	4,825	17,010	9.60	1,772
2024	86,268.78	9,921	11,629	74,639	9.62	7,759
2025	6,466.00	461	540	5,926	9.64	615
	2,175,712.76	1,071,032	1,255,462	920,251		96,565
ERIE OFFICE, THIRD AND WAYNE						
INTERIM SURVIVOR CURVE: IOWA 55-R1						
PROBABLE RETIREMENT DATE: 6-2035						
NET SALVAGE PERCENT: 0						
1959	398.80	338	396	3		
1960	62,089.67	52,544	61,592	498	8.03	62
1963	605.08	509	597	8	8.00	1
1964	615.37	516	605	11	11.00	1

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ERIE OFFICE, THIRD AND WAYNE						
INTERIM SURVIVOR CURVE: IOWA 55-R1						
PROBABLE RETIREMENT DATE: 6-2035						
NET SALVAGE PERCENT: 0						
1965	1,155.07	967	1,134	22	7.33	3
1968	1,891.26	1,571	1,842	50	8.33	6
1969	246.74	204	239	8	8.00	1
1971	5,216.24	4,298	5,038	178	8.48	21
1972	2,299.35	1,889	2,214	85	8.50	10
1973	4,912.28	4,025	4,718	194	8.43	23
1977	2,678.20	2,166	2,539	139	8.69	16
1979	42,999.09	34,541	40,489	2,510	8.81	285
1989	3,134.30	2,404	2,818	316	9.03	35
1991	647.94	491	576	72	9.00	8
1998	90,308.26	64,832	75,996	14,312	9.25	1,547
1999	23,436.75	16,656	19,524	3,913	9.27	422
2000	102,013.23	71,748	84,103	17,910	9.28	1,930
2003	41,255.86	27,979	32,797	8,459	9.32	908
2004	3,564.25	2,384	2,795	770	9.28	83
2005	12,168.19	8,011	9,390	2,778	9.35	297
2006	1,784.65	1,156	1,355	430	9.35	46
2007	170,713.09	108,570	127,266	43,447	9.37	4,637
2008	41,953.75	26,156	30,660	11,294	9.38	1,204
2010	259,347.45	154,514	181,121	78,226	9.39	8,331
2012	7,067.06	3,978	4,663	2,404	9.43	255
2013	4,647.04	2,528	2,963	1,684	9.41	179
2014	2,107.21	1,103	1,293	814	9.47	86
2015	23,482.58	11,760	13,785	9,698	9.44	1,027
2017	11,328.93	5,079	5,954	5,375	9.45	569
2018	79,308.22	33,082	38,779	40,530	9.46	4,284
2019	9,069.35	3,463	4,059	5,010	9.47	529
2021	5,275.56	1,568	1,838	3,438	9.47	363
2022	4,723.92	1,155	1,354	3,370	9.49	355
2025	38,515.80	2,713	3,180	35,336	9.50	3,720
	1,060,960.54	654,898	767,671	293,290		31,244
WARREN SERVICE CENTER - NEW						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2062						
NET SALVAGE PERCENT: 0						
2007	729,486.36	247,442	290,051	439,435	30.02	14,638
2009	1,196.30	377	442	754	30.16	25
2010	34,550.71	10,420	12,214	22,336	30.51	732
2011	2,487.21	716	839	1,648	30.52	54
2012	23,304.35	6,383	7,482	15,822	30.84	513
2014	7,496.69	1,825	2,139	5,357	31.15	172
2017	31,378.67	6,031	7,070	24,309	31.73	766
2018	1,669.50	289	339	1,331	31.69	42
2019	50,140.17	7,698	9,024	41,117	32.10	1,281
2020	258,032.22	34,246	40,143	217,889	32.28	6,750
2021	7,965.18	879	1,030	6,935	32.41	214
2023	10,265.18	638	748	9,517	32.93	289
2024	116,478.74	4,175	4,894	111,585	33.09	3,372
2025	5,475.07	119	139	5,336	33.14	161

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WARREN SERVICE CENTER - NEW						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2062						
NET SALVAGE PERCENT: 0						
	1,279,926.35	321,238	376,555	903,371		29,009
CORRY SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2036						
NET SALVAGE PERCENT: 0						
1951	6,042.91	5,100	5,978	65	9.29	7
1952	977.14	823	965	12	12.00	1
1979	2,344.92	1,853	2,172	173	9.61	18
1980	1,853.96	1,460	1,711	143	9.53	15
1988	3,190.26	2,422	2,839	351	10.03	35
1991	9,266.32	6,910	8,100	1,166	9.97	117
1992	3,673.60	2,722	3,191	483	10.06	48
1993	18,851.76	13,869	16,257	2,594	10.02	259
2003	3,347.81	2,228	2,612	736	10.22	72
2008	2,582.69	1,575	1,846	736	10.22	72
2009	2,444.16	1,458	1,709	735	10.35	71
2011	6,920.00	3,914	4,588	2,332	10.32	226
2015	3,574.30	1,738	2,037	1,537	10.39	148
2016	3,648.86	1,682	1,972	1,677	10.42	161
2019	6,975.21	2,564	3,006	3,970	10.47	379
2021	120,860.50	34,309	40,217	80,643	10.52	7,666
2023	17,201.65	2,999	3,515	13,686	10.56	1,296
2025	36,607.74	2,419	2,836	33,772	10.60	3,186
	250,363.79	90,045	105,551	144,813		13,777
ERIE - WELD SHOP AND GARAGE						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2035						
NET SALVAGE PERCENT: 0						
1998	82,754.45	60,019	70,354	12,400	9.22	1,345
1999	95,760.31	68,784	80,629	15,132	9.24	1,638
	178,514.76	128,803	150,983	27,532		2,983
WEST COUNTY SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2039						
NET SALVAGE PERCENT: 0						
1979	365,183.70	273,110	320,139	45,044	12.12	3,717
1980	32,267.02	24,026	28,163	4,104	12.14	338
1991	3,689.19	2,572	3,015	674	12.48	54
1993	16,452.49	11,283	13,226	3,227	12.56	257
2001	7,885.74	4,952	5,805	2,081	12.77	163
2005	5,270.81	3,100	3,634	1,637	12.89	127
2006	20,460.40	11,795	13,826	6,634	12.91	514

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WEST COUNTY SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2039						
NET SALVAGE PERCENT: 0						
2008	5,492.00	3,026	3,547	1,945	12.97	150
2011	1,277.81	645	756	522	13.05	40
2012	5,919.28	2,887	3,384	2,535	13.07	194
2014	10,459.00	4,689	5,496	4,963	13.13	378
2015	17,975.01	7,658	8,977	8,998	13.15	684
2016	1,789.73	719	843	947	13.15	72
2017	6,050.22	2,268	2,659	3,392	13.20	257
2019	4,234.70	1,328	1,557	2,678	13.26	202
2021	20,010.29	4,757	5,576	14,434	13.34	1,082
2022	85,317.66	16,425	19,253	66,064	13.38	4,938
2023	106,465.12	15,121	17,725	88,740	13.41	6,617
2024	30,143.19	2,544	2,982	27,161	13.45	2,019
2025	122,121.37	6,441	7,550	114,571	13.47	8,506
	868,464.73	399,346	468,113	400,352		30,309
OIL CITY - FRANKLIN SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2051						
NET SALVAGE PERCENT: 0						
1986	458,453.16	270,180	316,705	141,749	20.71	6,844
1995	106,444.48	56,533	66,268	40,177	21.57	1,863
1996	4,222.89	2,210	2,591	1,632	21.76	75
1999	324.28	162	190	134	22.33	6
2000	1,531.44	749	878	653	21.77	30
2002	755.00	355	416	339	22.60	15
2003	63,711.95	29,307	34,354	29,358	22.27	1,318
2004	16,679.72	7,494	8,784	7,895	22.37	353
2005	5,704.15	2,498	2,928	2,776	22.39	124
2007	7,002.42	2,899	3,398	3,604	22.67	159
2008	65,834.21	26,396	30,941	34,893	22.72	1,536
2010	4,725.77	1,763	2,067	2,659	22.92	116
2011	8,164.91	2,922	3,425	4,740	23.01	206
2012	189,302.40	64,740	75,888	113,414	23.07	4,916
2013	6,216.65	2,021	2,369	3,848	23.18	166
2014	27,885.38	8,567	10,042	17,843	23.26	767
2015	13,309.37	3,839	4,500	8,809	23.37	377
2016	31,184.87	8,363	9,803	21,382	23.45	912
2017	334,852.44	82,722	96,967	237,886	23.53	10,110
2018	5,082.70	1,140	1,336	3,746	23.56	159
2019	5,133.99	1,026	1,203	3,931	23.68	166
2020	81,015.85	14,074	16,498	64,518	23.83	2,707
2021	6,226.97	907	1,063	5,164	23.91	216
2022	163,475.41	18,878	22,129	141,347	24.05	5,877
2023	18,073.79	1,502	1,761	16,313	24.17	675
2024	20,579.00	1,000	1,172	19,407	24.26	800
	1,645,893.20	612,247	717,675	928,218		40,493

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 375.3 STRUCTURES AND IMPROVEMENTS - LARGE
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
BRADFORD						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2055						
NET SALVAGE PERCENT: 0						
1995	583,613.88	290,897	340,989	242,625	24.11	10,063
1996	1,302.21	639	749	553	24.04	23
1997	4,035.13	1,948	2,283	1,752	24.33	72
1999	81.08	38	45	37	18.50	2
2003	11,324.03	4,838	5,671	5,653	25.01	226
2012	11,717.45	3,663	4,294	7,424	26.05	285
2013	14,910.71	4,423	5,185	9,726	26.15	372
2015	47,608.06	12,464	14,610	32,998	26.42	1,249
2016	17,575.36	4,271	5,006	12,569	26.52	474
2018	23,061.92	4,652	5,453	17,609	26.80	657
2019	71,098.72	12,746	14,941	56,158	26.92	2,086
2020	9,272.81	1,442	1,690	7,582	27.08	280
2023	7,668.78	566	663	7,005	27.47	255
	803,270.14	342,587	401,580	401,690		16,044
SHARON-GREENVILLE SERVICE CENTER						
INTERIM SURVIVOR CURVE: IOWA 60-S0						
PROBABLE RETIREMENT DATE: 6-2056						
NET SALVAGE PERCENT: 0						
1996	792,576.02	383,179	449,161	343,415	24.83	13,831
1999	81.07	37	43	38	19.00	2
2002	6,431.49	2,766	3,242	3,189	25.51	125
2008	1,984.30	719	843	1,141	26.53	43
2009	43,014.78	15,034	17,623	25,392	26.42	961
2011	57,199.56	18,377	21,541	35,658	26.65	1,338
2014	47,182.84	12,918	15,142	32,040	27.04	1,185
2016	5,511.88	1,309	1,534	3,977	27.24	146
2017	17,423.98	3,797	4,451	12,973	27.43	473
2018	3,074.00	606	710	2,364	27.49	86
2020	154,470.03	23,405	27,435	127,035	27.83	4,565
2021	5,081.08	644	755	4,326	27.91	155
2022	1,366.85	137	161	1,206	28.05	43
2023	6,353.21	457	536	5,818	28.24	206
2025	54,510.16	1,379	1,616	52,894	28.51	1,855
	1,196,261.25	464,764	544,795	651,466		25,014
	11,456,732.03	5,002,482	5,863,903	5,592,830		363,216

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 15.40 3.17

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 375.4 STRUCTURES AND IMPROVEMENTS - SMALL
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
1912	310.00	310	310			
1916	3,206.00	3,206	3,206			
1919	1,231.82	1,232	1,232			
1920	507.42	507	507			
1921	225.62	226	226			
1922	703.30	703	703			
1924	1,708.94	1,709	1,709			
1925	1,610.14	1,610	1,610			
1926	49.68	50	50			
1927	1,245.19	1,245	1,245			
1928	2,595.70	2,596	2,596			
1929	3,287.20	3,287	3,287			
1930	559.11	559	559			
1931	768.72	769	769			
1932	313.50	314	314			
1933	30.50	30	31			
1934	324.98	325	325			
1935	329.83	330	330			
1937	179.50	180	180			
1938	829.02	829	829			
1939	456.78	457	457			
1940	190.77	191	191			
1941	322.54	323	323			
1942	1,437.69	1,438	1,438			
1943	628.17	628	628			
1944	812.59	813	813			
1945	68.89	69	69			
1946	1,709.32	1,693	1,709			
1947	1,542.57	1,509	1,543			
1948	1,218.47	1,177	1,218			
1949	4,014.04	3,831	4,014			
1950	2,523.56	2,379	2,524			
1951	3,886.73	3,619	3,887			
1952	7,095.24	6,526	7,031	64	3.20	20
1953	2,555.40	2,322	2,502	54	3.60	15
1954	8,566.28	7,688	8,283	284	4.12	69
1955	10,454.99	9,274	9,991	464	4.50	103
1956	20,294.34	17,788	19,164	1,131	4.94	229
1957	3,834.68	3,321	3,578	257	5.35	48
1958	4,196.11	3,591	3,869	327	5.74	57
1959	7,449.87	6,301	6,788	662	6.19	107
1960	7,854.97	6,565	7,073	782	6.57	119
1961	2,749.13	2,270	2,446	304	6.91	44
1962	5,290.80	4,316	4,650	641	7.37	87
1963	5,530.86	4,456	4,801	730	7.77	94
1964	1,410.22	1,123	1,210	200	8.00	25
1965	20,550.13	16,152	17,401	3,149	8.56	368
1966	8,893.06	6,903	7,437	1,456	8.93	163
1967	9,377.56	7,186	7,742	1,636	9.35	175
1968	9,977.73	7,546	8,130	1,848	9.73	190
1969	1,521.39	1,135	1,223	299	10.31	29
1970	17,653.13	12,993	13,998	3,655	10.56	346

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 375.4 STRUCTURES AND IMPROVEMENTS - SMALL
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
1971	4,786.48	3,474	3,743	1,044	10.99	95
1972	3,189.49	2,282	2,459	731	11.42	64
1973	5,084.26	3,584	3,861	1,223	11.76	104
1974	389.17	270	291	98	12.25	8
1975	300.00	205	221	79	13.17	6
1977	162.92	108	116	47	15.67	3
1978	13,046.82	8,500	9,157	3,889	13.94	279
1979	2,759.78	1,768	1,905	855	14.49	59
1980	172.41	108	116	56	14.00	4
1982	3,278.79	1,989	2,143	1,136	15.78	72
1983	984.90	586	631	354	16.09	22
1984	3,666.89	2,138	2,303	1,364	16.63	82
1985	1,956.08	1,117	1,203	753	17.11	44
1986	2,400.32	1,342	1,446	955	17.69	54
1987	1,153.76	631	680	474	18.23	26
1988	2,983.51	1,595	1,718	1,265	18.60	68
1991	1,795.99	893	962	834	20.34	41
1992	4,585.00	2,219	2,391	2,194	20.70	106
1993	6,491.51	3,058	3,295	3,197	21.17	151
1998	1,212.16	489	527	685	23.62	29
1999	13,735.87	5,357	5,771	7,965	24.43	326
2000	23,373.46	8,788	9,468	13,906	24.97	557
2001	1,434.65	519	559	876	25.76	34
2002	5,044.49	1,754	1,890	3,155	26.07	121
2003	1,457.52	486	524	934	26.69	35
2005	40,137.94	12,232	13,178	26,960	27.82	969
2006	5,380.00	1,560	1,681	3,699	28.45	130
2007	3,476.75	958	1,032	2,445	29.11	84
2008	16,037.44	4,182	4,505	11,532	29.57	390
2009	28,331.69	6,970	7,509	20,823	30.18	690
2010	27,515.64	6,363	6,855	20,660	30.74	672
2011	35,970.80	7,788	8,390	27,580	31.34	880
2012	21,998.90	4,433	4,776	17,223	31.95	539
2013	16,460.37	3,070	3,307	13,153	32.56	404
2014	29,777.46	5,107	5,502	24,275	33.16	732
2015	52,623.47	8,236	8,873	43,750	33.73	1,297
2016	10,324.31	1,461	1,574	8,750	34.31	255
2017	45,122.90	5,708	6,149	38,973	34.95	1,115
2018	8,849.84	985	1,061	7,789	35.57	219
2019	28,840.14	2,769	2,983	25,857	36.16	715
2020	48,758.68	3,937	4,242	44,517	36.76	1,211
2021	46,425.50	3,041	3,276	43,149	37.39	1,154
2022	32,331.97	1,625	1,751	30,581	37.99	805
2024	12,788.70	249	268	12,520	39.25	319
2025	5,089.81	60	65	5,025	39.57	127
	815,772.72	299,594	320,500	495,273		17,385
	815,772.72	299,594	320,500	495,273		17,385

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 28.50 2.13

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-L1.5						
NET SALVAGE PERCENT: 0						
1883	4,328.49	4,002	3,757	571	11.65	49
1884	1,216.00	1,116	1,048	168	12.92	13
1885	2,485.56	2,266	2,127	359	13.81	26
1886	19,870.37	18,261	17,143	2,727	12.28	222
1887	46,736.01	42,642	40,031	6,705	13.28	505
1888	38,729.68	35,081	32,933	5,797	14.28	406
1889	265.08	242	227	38	12.67	3
1890	29.15	26	24	5		
1891	581.52	531	498	84	12.00	7
1892	1,112.59	1,008	946	167	13.92	12
1893	535.23	481	452	83	13.83	6
1894	242.42	220	207	35	11.67	3
1895	472.70	425	399	74	14.80	5
1896	265.51	237	222	44	14.67	3
1897	158.61	142	133	26	13.00	2
1898	74.02	66	62	12	12.00	1
1899	50,685.03	45,434	42,652	8,033	14.58	551
1901	289.35	259	243	46	15.33	3
1902	851.96	756	710	142	15.78	9
1903	627.82	553	519	109	15.57	7
1904	56.60	50	47	10	10.00	1
1905	420.60	369	346	75	18.75	4
1906	21.02	19	18	3		
1909	130.54	114	107	24	24.00	1
1910	38.38	34	32	6		
1911	4,604.22	3,998	3,753	851	17.37	49
1912	2,129.30	1,833	1,721	408	18.55	22
1913	2,146.90	1,856	1,742	405	17.61	23
1914	1,723.55	1,476	1,386	338	18.78	18
1915	493.05	424	398	95	19.00	5
1916	109,668.91	93,460	87,738	21,931	18.96	1,157
1917	2,061.80	1,763	1,655	407	18.50	22
1918	2,353.21	1,994	1,872	481	19.24	25
1919	18,397.82	15,638	14,681	3,717	18.77	198
1920	5,336.52	4,493	4,218	1,119	19.63	57
1921	14,550.81	12,287	11,535	3,016	19.21	157
1922	13,902.61	11,770	11,049	2,854	18.65	153
1923	7,046.75	5,908	5,546	1,501	19.75	76
1924	32,811.92	27,575	25,887	6,925	19.24	360
1925	60,628.81	50,449	47,360	13,269	20.23	656
1926	120,582.08	100,529	94,374	26,208	19.79	1,324
1927	79,440.67	65,562	61,548	17,893	20.81	860
1928	46,866.61	38,740	36,368	10,499	20.39	515
1929	81,117.46	67,149	63,038	18,079	20.02	903
1930	94,243.96	77,205	72,478	21,766	21.03	1,035
1931	44,267.75	36,300	34,078	10,190	20.67	493
1932	22,913.19	18,589	17,451	5,462	21.67	252
1933	6,079.23	4,935	4,633	1,446	21.26	68
1934	24,632.61	20,004	18,779	5,854	21.13	277
1935	35,050.08	28,152	26,428	8,622	22.11	390
1936	33,577.56	26,969	25,318	8,260	21.85	378
1937	47,799.56	38,388	36,038	11,762	21.62	544
1938	45,448.15	36,086	33,877	11,571	22.64	511

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-L1.5						
NET SALVAGE PERCENT: 0						
1939	31,778.94	25,217	23,673	8,106	22.45	361
1940	23,229.51	18,416	17,288	5,942	22.25	267
1941	32,656.40	25,586	24,020	8,636	23.28	371
1942	8,231.30	6,442	6,048	2,183	23.22	94
1943	3,053.80	2,386	2,240	814	23.26	35
1944	4,215.64	3,288	3,087	1,129	23.04	49
1945	8,589.11	6,617	6,212	2,377	24.01	99
1946	35,058.28	26,949	25,299	9,759	23.86	409
1947	114,715.46	87,964	82,578	32,137	23.81	1,350
1948	113,243.04	86,608	81,306	31,937	23.76	1,344
1949	206,183.50	155,648	146,119	60,064	24.76	2,426
1950	269,798.57	203,023	190,593	79,206	24.75	3,200
1951	278,815.18	209,084	196,283	82,532	24.76	3,333
1952	178,746.88	133,560	125,383	53,364	24.77	2,154
1953	178,891.44	133,131	124,980	53,911	24.83	2,171
1954	264,151.22	195,736	183,752	80,399	24.90	3,229
1955	749,728.96	553,000	519,143	230,586	24.99	9,227
1956	852,828.10	625,976	587,651	265,177	25.09	10,569
1957	450,375.40	328,909	308,772	141,603	25.21	5,617
1958	222,907.38	161,898	151,986	70,921	25.34	2,799
1959	358,458.81	256,477	240,774	117,685	26.34	4,468
1960	209,594.48	149,064	139,938	69,656	26.50	2,629
1961	219,597.57	156,617	147,028	72,570	25.84	2,808
1962	196,332.25	139,082	130,567	65,765	26.04	2,526
1963	291,532.10	205,064	192,509	99,023	26.25	3,772
1964	365,835.03	255,426	239,788	126,047	26.47	4,762
1965	707,870.51	490,483	460,454	247,417	26.70	9,267
1966	1,260,213.94	866,145	813,116	447,098	26.96	16,584
1967	1,489,152.62	1,014,858	952,724	536,429	27.22	19,707
1968	1,366,827.06	923,428	866,892	499,935	27.49	18,186
1969	1,443,720.30	966,426	907,257	536,463	27.78	19,311
1970	1,463,896.05	978,615	918,700	545,196	27.40	19,898
1971	1,935,717.47	1,281,058	1,202,626	733,091	27.72	26,446
1972	1,595,608.76	1,045,124	981,137	614,472	28.05	21,906
1973	2,026,417.46	1,312,916	1,232,534	793,883	28.40	27,954
1974	1,890,921.32	1,221,157	1,146,393	744,528	28.11	26,486
1975	1,172,263.57	748,139	702,335	469,929	28.49	16,495
1976	1,279,539.01	806,621	757,236	522,303	28.88	18,085
1977	3,322,847.63	2,068,140	1,941,520	1,381,328	29.27	47,193
1978	3,082,716.10	1,908,201	1,791,373	1,291,343	29.08	44,407
1979	2,316,096.40	1,413,977	1,327,408	988,688	29.51	33,503
1980	3,278,777.19	1,988,250	1,866,521	1,412,256	29.37	48,085
1981	2,792,481.56	1,668,228	1,566,092	1,226,390	29.82	41,126
1982	2,923,042.82	1,719,334	1,614,069	1,308,974	30.28	43,229
1983	3,784,340.37	2,206,270	2,071,193	1,713,147	30.22	56,689
1984	4,595,007.03	2,634,777	2,473,465	2,121,542	30.69	69,128
1985	5,552,132.81	3,150,835	2,957,928	2,594,205	30.67	84,584
1986	6,102,701.88	3,401,646	3,193,383	2,909,319	31.17	93,337
1987	4,548,909.98	2,505,540	2,352,141	2,196,769	31.19	70,432
1988	7,159,153.74	3,866,659	3,629,926	3,529,228	31.72	111,262
1989	6,308,727.31	3,361,921	3,156,090	3,152,637	31.78	99,202
1990	6,138,232.63	3,202,316	3,006,257	3,131,976	32.32	96,905
1991	6,976,734.59	3,584,646	3,365,179	3,611,556	32.41	111,433
1992	7,124,920.92	3,577,423	3,358,399	3,766,522	32.97	114,241
1993	7,906,970.29	3,901,299	3,662,446	4,244,524	33.11	128,195

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 376.1 MAINS - EXCLUDING CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 70-L1.5						
NET SALVAGE PERCENT: 0						
1994	6,024,621.36	2,899,048	2,721,556	3,303,065	33.69	98,043
1995	6,534,111.79	3,083,447	2,894,666	3,639,446	33.85	107,517
1996	5,782,921.42	2,655,518	2,492,936	3,289,985	34.45	95,500
1997	7,283,760.80	3,271,865	3,071,548	4,212,213	34.64	121,600
1998	5,139,525.38	2,240,833	2,103,640	3,035,885	35.25	86,124
1999	5,447,280.89	2,316,184	2,174,378	3,272,903	35.48	92,246
2000	5,708,670.00	2,349,689	2,205,831	3,502,839	36.10	97,032
2001	4,160,474.63	1,654,621	1,553,318	2,607,157	36.73	70,982
2002	5,330,699.45	2,057,650	1,931,672	3,399,027	36.99	91,890
2003	5,265,962.14	1,956,832	1,837,027	3,428,935	37.63	91,122
2004	4,706,238.96	1,690,010	1,586,541	3,119,698	37.92	82,271
2005	3,081,899.05	1,060,790	995,844	2,086,055	38.58	54,071
2006	5,197,924.58	1,721,033	1,615,664	3,582,261	38.89	92,113
2007	7,064,323.76	2,230,207	2,093,665	4,970,659	39.55	125,680
2008	6,040,573.70	1,823,649	1,711,998	4,328,576	39.89	108,513
2009	6,672,935.49	1,908,460	1,791,616	4,881,319	40.57	120,318
2010	5,606,345.70	1,521,562	1,428,406	4,177,940	40.93	102,075
2011	6,270,557.78	1,599,619	1,501,684	4,768,874	41.61	114,609
2012	5,436,496.39	1,303,672	1,223,856	4,212,640	42.00	100,301
2013	7,438,122.05	1,658,701	1,557,148	5,880,974	42.69	137,760
2014	5,649,819.44	1,169,513	1,097,911	4,551,908	43.10	105,613
2015	7,809,248.85	1,480,634	1,389,983	6,419,266	43.81	146,525
2016	9,736,105.09	1,684,346	1,581,223	8,154,882	44.22	184,416
2017	7,102,506.66	1,101,599	1,034,155	6,068,352	44.94	135,032
2018	9,036,691.20	1,245,256	1,169,016	7,867,675	45.38	173,373
2019	9,572,527.86	1,148,703	1,078,375	8,494,153	45.83	185,340
2020	12,502,899.31	1,266,544	1,189,001	11,313,898	46.56	242,996
2021	11,256,296.91	933,147	876,016	10,380,281	47.03	220,716
2022	10,487,286.75	671,186	630,093	9,857,194	47.51	207,476
2023	27,846,761.69	1,247,535	1,171,156	26,675,606	48.00	555,742
2024	28,669,627.50	722,475	678,242	27,991,386	48.26	580,012
2025	14,817,234.70	228,185	214,215	14,603,020	48.03	304,040
	377,025,040.28	116,815,979	109,664,023	267,361,017		6,646,760

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 40.20 1.76

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 376.2 MAINS - CATHODIC PROTECTION
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 27-S2.5						
NET SALVAGE PERCENT: 0						
1968	2,320.46	2,320	2,320			
1972	1,455.26	1,455	1,455			
1973	65,842.97	65,369	65,843			
1974	16,734.59	16,638	16,735			
1975	25,292.97	25,038	25,293			
1979	1,200.00	1,165	1,200			
1980	22,371.78	21,665	22,372			
1981	1,997.08	1,926	1,997			
1983	375.00	358	375			
1985	72,757.63	68,523	72,758			
1986	9,354.97	8,776	9,355			
1987	3,412.50	3,185	3,412			
1988	4,125.07	3,811	4,125			
1989	19,664.54	18,107	19,665			
1997	4,794.05	4,050	4,647	147	5.25	28
1998	2,549.86	2,126	2,439	111	5.55	20
1999	3,838.02	3,143	3,606	232	5.80	40
2001	497,106.21	391,769	449,529	47,577	6.52	7,297
2003	171,719.88	129,133	148,171	23,549	7.34	3,208
2004	4,562.11	3,344	3,837	725	7.71	94
2005	5,512.06	3,918	4,496	1,016	8.26	123
2006	34,263.56	23,614	27,095	7,169	8.68	826
2007	249,162.22	165,518	189,921	59,241	9.22	6,425
2009	3,407.52	2,077	2,383	1,025	10.46	98
2011	218,905.62	120,092	137,797	81,109	11.72	6,921
2012	341,023.31	175,763	201,676	139,347	12.46	11,184
2013	102,103.93	49,153	56,400	45,704	13.20	3,462
2016	180,728.70	67,195	77,102	103,627	15.63	6,630
2017	238,649.93	79,542	91,269	147,381	16.50	8,932
2018	42,922.88	12,636	14,499	28,424	17.38	1,635
2020	81,341.02	17,423	19,992	61,349	19.26	3,185
2023	3,766.73	347	398	3,369	22.16	152
2025	74,670.40	2,292	2,630	72,040	23.70	3,040
	2,507,932.83	1,491,471	1,684,792	823,141		63,300

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 13.00 2.52

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
1911	35.68	36	36			
1914	94.06	94	94			
1916	347.13	347	347			
1917	210.65	211	211			
1918	488.71	489	489			
1919	263.81	264	264			
1920	15.53	16	16			
1921	241.81	242	242			
1922	19.62	20	20			
1923	902.22	902	902			
1924	1,196.73	1,197	1,197			
1925	676.23	676	676			
1926	18.13	18	18			
1927	405.26	405	405			
1928	290.49	290	290			
1929	477.43	477	477			
1930	744.34	744	744			
1931	222.49	222	222			
1932	18.08	18	18			
1933	237.17	237	237			
1934	22.15	22	22			
1935	4.76	5	5			
1936	1,371.94	1,372	1,372			
1937	396.12	396	396			
1938	1,539.30	1,539	1,539			
1939	1,601.64	1,602	1,602			
1940	228.45	228	228			
1941	556.22	556	556			
1942	1,307.29	1,307	1,307			
1943	279.95	280	280			
1944	276.29	276	276			
1945	134.08	134	134			
1946	2,784.56	2,781	2,688	97	1.00	97
1947	2,522.35	2,487	2,404	118	1.11	106
1948	6,208.73	6,091	5,887	322	1.49	216
1949	3,494.52	3,411	3,297	198	1.89	105
1950	2,553.26	2,478	2,395	158	2.26	70
1951	7,044.19	6,799	6,571	473	2.69	176
1952	9,988.90	9,585	9,264	725	3.09	235
1953	9,227.62	8,800	8,505	723	3.51	206
1954	5,347.59	5,067	4,897	451	3.96	114
1955	16,413.33	15,452	14,935	1,478	4.37	338
1956	30,586.37	28,595	27,637	2,949	4.82	612
1957	9,019.76	8,372	8,092	928	5.27	176
1958	8,937.31	8,234	7,958	979	5.73	171
1959	9,566.06	8,809	8,514	1,052	5.69	185
1960	7,140.43	6,523	6,305	835	6.19	135
1961	5,104.13	4,624	4,469	635	6.68	95
1962	7,554.17	6,785	6,558	996	7.17	139
1963	7,161.40	6,419	6,204	957	7.20	133
1964	5,637.20	5,006	4,838	799	7.76	103
1965	17,792.22	15,650	15,126	2,666	8.25	323
1966	13,043.12	11,438	11,055	1,988	8.32	239

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
1967	14,977.69	12,999	12,564	2,414	8.88	272
1968	8,587.09	7,424	7,175	1,412	8.99	157
1969	13,359.90	11,423	11,040	2,320	9.55	243
1970	12,909.00	10,983	10,615	2,294	9.68	237
1971	14,024.95	11,794	11,399	2,626	10.26	256
1972	14,252.02	11,915	11,516	2,736	10.44	262
1973	43,484.65	35,901	34,699	8,786	11.04	796
1974	15,708.58	12,881	12,450	3,259	11.24	290
1975	5,133.59	4,179	4,039	1,095	11.53	95
1976	22,826.50	18,325	17,711	5,116	12.09	423
1977	24,724.07	19,683	19,024	5,700	12.36	461
1978	27,758.34	21,904	21,170	6,588	12.62	522
1979	30,374.10	23,740	22,945	7,429	12.92	575
1980	115,913.22	89,694	86,690	29,223	13.23	2,209
1981	55,430.22	42,188	40,775	14,655	13.89	1,055
1982	60,814.90	45,769	44,236	16,579	14.22	1,166
1983	162,377.84	120,744	116,700	45,678	14.57	3,135
1984	138,782.07	101,894	98,482	40,300	14.93	2,699
1985	136,784.97	99,101	95,782	41,003	15.31	2,678
1986	186,184.68	133,736	129,257	56,928	15.39	3,699
1987	185,362.99	131,163	126,770	58,593	15.81	3,706
1988	208,602.78	145,313	140,446	68,157	16.22	4,202
1989	182,448.05	124,995	120,809	61,639	16.66	3,700
1990	204,894.76	137,956	133,336	71,559	17.10	4,185
1991	228,241.09	151,643	146,564	81,677	17.30	4,721
1992	209,266.69	136,379	131,812	77,455	17.77	4,359
1993	259,336.21	166,442	160,868	98,468	18.00	5,470
1994	151,235.75	94,991	91,810	59,426	18.50	3,212
1995	208,027.38	128,374	124,075	83,952	18.77	4,473
1996	108,014.96	65,090	62,910	45,105	19.29	2,338
1997	150,701.20	88,974	85,994	64,707	19.60	3,301
1998	49,185.57	28,415	27,463	21,723	19.91	1,091
1999	18,433.96	10,404	10,056	8,378	20.24	414
2000	46,361.04	25,517	24,662	21,699	20.63	1,052
2001	47,160.45	25,273	24,427	22,733	20.99	1,083
2002	171,213.42	89,562	86,562	84,651	21.20	3,993
2003	50,369.53	25,552	24,696	25,674	21.61	1,188
2004	83,759.29	41,293	39,910	43,849	21.85	2,007
2005	156,945.63	75,004	72,492	84,454	22.12	3,818
2006	34,856.99	16,104	15,565	19,292	22.43	860
2007	193,768.37	86,285	83,395	110,373	22.73	4,856
2008	140,130.23	59,948	57,940	82,190	23.07	3,563
2009	156,878.35	64,493	62,333	94,545	23.28	4,061
2010	160,687.26	63,214	61,097	99,590	23.51	4,236
2011	221,937.54	83,493	80,697	141,241	23.63	5,977
2012	285,147.39	102,026	98,609	186,538	23.79	7,841
2013	201,093.86	67,990	65,713	135,381	23.98	5,646
2014	268,675.65	85,546	82,681	185,995	24.08	7,724
2015	217,027.91	64,739	62,571	154,457	24.11	6,406
2016	286,155.98	79,151	76,500	209,656	24.19	8,667
2017	471,844.59	120,273	116,245	355,600	24.11	14,749
2018	181,875.73	42,195	40,782	141,094	24.00	5,879
2019	539,815.34	112,336	108,574	431,241	23.78	18,135
2020	585,713.92	107,010	103,426	482,288	23.49	20,532
2021	467,724.82	72,778	70,341	397,384	23.07	17,225

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 378 MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
2022	604,385.41	76,636	74,069	530,316	22.39	23,685
2023	447,356.37	42,678	41,249	406,107	21.33	19,039
2024	386,501.51	23,190	22,413	364,089	19.58	18,595
2025	544,468.65	21,833	21,102	523,367	17.94	29,173
	10,421,765.98	4,108,563	3,971,454	6,450,312		310,366

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 20.80 2.98

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 380 SERVICES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
1884	144.48	144	144			
1886	825.94	826	826			
1887	236.95	237	237			
1888	40.62	41	41			
1889	77.39	77	77			
1890	48.42	48	48			
1891	101.56	102	102			
1892	80.43	80	80			
1893	17.61	18	18			
1894	71.64	72	72			
1895	81.06	81	81			
1896	141.23	141	141			
1897	214.78	215	215			
1898	185.03	185	185			
1899	93.41	93	93			
1900	10.47	10	10			
1901	554.33	554	554			
1902	1,940.83	1,941	1,941			
1903	3,293.63	3,294	3,294			
1904	2,442.57	2,443	2,443			
1905	2,188.58	2,189	2,189			
1906	2,143.59	2,144	2,144			
1907	2,238.97	2,239	2,239			
1908	1,944.56	1,945	1,945			
1909	1,549.05	1,549	1,549			
1910	1,381.01	1,381	1,381			
1911	676.91	677	677			
1912	512.86	513	513			
1913	543.82	544	544			
1914	577.92	578	578			
1915	989.98	990	990			
1916	11,546.88	11,480	11,547			
1917	469.14	467	469			
1918	5,201.64	5,132	5,202			
1919	1,383.71	1,367	1,384			
1920	809.66	792	810			
1921	2,670.57	2,589	2,671			
1922	3,684.68	3,576	3,685			
1923	2,678.37	2,574	2,678			
1924	3,499.23	3,366	3,499			
1925	5,269.51	5,019	5,270			
1926	2,405.77	2,292	2,406			
1927	2,725.08	2,570	2,725			
1928	3,437.46	3,243	3,437			
1929	4,336.62	4,090	4,337			
1930	3,054.75	2,851	3,055			
1931	2,635.82	2,459	2,636			
1932	1,226.46	1,132	1,226			
1933	1,248.38	1,152	1,248			
1934	3,169.53	2,921	3,170			
1935	2,675.58	2,439	2,663	13	13.00	1
1936	2,154.36	1,961	2,141	13	13.00	1
1937	2,611.61	2,374	2,592	20	10.00	2

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 380 SERVICES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
1938	2,497.41	2,244	2,450	47	9.40	5
1939	2,717.84	2,438	2,662	56	9.33	6
1940	3,209.61	2,873	3,137	73	10.43	7
1941	3,310.84	2,929	3,198	113	11.30	10
1942	1,425.00	1,257	1,373	52	10.40	5
1943	686.19	604	660	26	13.00	2
1944	842.43	739	807	35	11.67	3
1945	970.51	841	918	53	13.25	4
1946	2,970.57	2,566	2,802	169	12.07	14
1947	4,299.64	3,701	4,041	259	12.95	20
1948	7,052.36	6,047	6,603	449	12.83	35
1949	8,605.83	7,284	7,953	653	13.89	47
1950	10,866.33	9,158	10,000	866	13.97	62
1951	12,884.53	10,810	11,803	1,082	14.24	76
1952	14,199.60	11,857	12,947	1,253	14.40	87
1953	11,494.75	9,551	10,429	1,066	14.60	73
1954	14,283.27	11,805	12,890	1,393	14.98	93
1955	21,927.03	18,022	19,678	2,249	15.20	148
1956	29,042.11	23,530	25,692	3,350	16.18	207
1957	24,384.44	19,639	21,444	2,940	16.52	178
1958	13,945.02	11,160	12,186	1,759	16.75	105
1959	19,497.64	15,501	16,925	2,573	17.04	151
1960	18,473.54	14,585	15,925	2,549	17.46	146
1961	20,257.21	15,878	17,337	2,920	17.70	165
1962	20,750.95	16,144	17,627	3,124	18.06	173
1963	30,095.55	23,231	25,366	4,730	18.40	257
1964	29,650.03	22,700	24,786	4,864	18.78	259
1965	32,516.13	24,686	26,954	5,562	19.11	291
1966	152,153.87	114,496	125,017	27,137	19.49	1,392
1967	180,932.02	134,903	147,299	33,633	19.88	1,692
1968	185,117.65	136,709	149,271	35,847	20.28	1,768
1969	189,903.93	138,858	151,618	38,286	20.68	1,851
1970	307,743.74	222,745	243,213	64,531	21.08	3,061
1971	422,263.82	302,383	330,169	92,095	21.51	4,281
1972	514,257.35	366,974	400,696	113,561	21.37	5,314
1973	529,773.29	373,702	408,042	121,731	21.82	5,579
1974	755,120.47	526,319	574,683	180,437	22.28	8,099
1975	470,496.39	323,890	353,653	116,843	22.74	5,138
1976	614,970.87	417,934	456,338	158,633	23.22	6,832
1977	1,472,433.60	987,561	1,078,309	394,125	23.69	16,637
1978	1,008,598.07	671,928	733,672	274,926	23.67	11,615
1979	1,558,224.53	1,023,442	1,117,487	440,738	24.17	18,235
1980	2,167,658.13	1,402,692	1,531,587	636,071	24.68	25,773
1981	2,213,430.42	1,420,137	1,550,635	662,795	24.72	26,812
1982	2,034,039.95	1,284,293	1,402,308	631,732	25.25	25,019
1983	2,005,013.62	1,245,314	1,359,748	645,266	25.78	25,030
1984	2,458,130.24	1,510,767	1,649,593	808,537	25.87	31,254
1985	1,406,073.75	848,987	927,002	479,072	26.41	18,140
1986	2,697,137.65	1,609,112	1,756,975	940,163	26.54	35,424
1987	2,617,906.74	1,531,999	1,672,776	945,131	27.11	34,863
1988	3,457,384.60	1,996,294	2,179,736	1,277,649	27.26	46,869
1989	3,614,292.45	2,043,882	2,231,697	1,382,595	27.85	49,644
1990	3,450,909.40	1,922,157	2,098,786	1,352,123	28.04	48,221
1991	3,790,837.48	2,064,490	2,254,199	1,536,638	28.64	53,654
1992	3,778,458.18	2,022,609	2,208,469	1,569,989	28.86	54,400

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 380 SERVICES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
1993	4,028,034.13	2,117,538	2,312,121	1,715,913	29.10	58,966
1994	4,225,418.58	2,178,626	2,378,823	1,846,596	29.36	62,895
1995	4,380,964.07	2,213,263	2,416,643	1,964,321	29.63	66,295
1996	4,156,607.90	2,042,557	2,230,250	1,926,358	30.27	63,639
1997	5,413,383.89	2,599,507	2,838,379	2,575,005	30.58	84,206
1998	4,260,290.85	2,008,301	2,192,846	2,067,445	30.55	67,674
1999	4,508,142.63	2,071,041	2,261,352	2,246,791	30.89	72,735
2000	4,796,848.15	2,143,711	2,340,699	2,456,149	31.25	78,597
2001	3,897,285.75	1,691,812	1,847,275	2,050,011	31.61	64,853
2002	4,745,585.16	2,008,332	2,192,880	2,552,705	31.69	80,552
2003	4,786,823.11	1,959,725	2,139,807	2,647,016	32.10	82,462
2004	4,394,297.77	1,746,294	1,906,763	2,487,535	32.22	77,205
2005	4,893,180.01	1,882,896	2,055,918	2,837,262	32.38	87,624
2006	4,830,205.83	1,794,421	1,959,313	2,870,893	32.56	88,172
2007	4,843,056.67	1,732,361	1,891,550	2,951,507	32.77	90,067
2008	5,273,877.02	1,810,522	1,976,893	3,296,984	33.00	99,909
2009	5,305,008.44	1,750,122	1,910,943	3,394,065	33.01	102,819
2010	4,874,165.47	1,538,774	1,680,174	3,193,991	33.06	96,612
2011	5,386,504.08	1,619,722	1,768,560	3,617,944	33.14	109,172
2012	5,248,557.99	1,495,314	1,632,720	3,615,838	33.26	108,714
2013	5,245,900.70	1,413,770	1,543,683	3,702,218	33.20	111,513
2014	4,808,901.80	1,217,133	1,328,977	3,479,925	33.20	104,817
2015	4,800,429.54	1,136,742	1,241,199	3,559,231	33.04	107,725
2016	5,540,864.24	1,214,557	1,326,164	4,214,700	32.95	127,912
2017	5,144,957.30	1,035,680	1,130,850	4,014,107	32.73	122,643
2018	5,590,741.65	1,021,428	1,115,288	4,475,454	32.43	138,004
2019	6,226,414.00	1,019,887	1,113,606	5,112,808	31.92	160,176
2020	5,681,714.40	814,190	889,007	4,792,707	31.38	152,731
2021	7,129,438.06	869,791	949,717	6,179,721	30.59	202,018
2022	5,520,325.22	545,408	595,526	4,924,799	29.64	166,154
2023	7,685,186.10	568,704	620,963	7,064,223	28.15	250,949
2024	6,141,627.39	283,743	309,817	5,831,810	25.78	226,215
2025	8,302,339.10	255,712	279,210	8,023,129	23.64	339,388
	216,577,440.01	76,829,138	83,883,689	132,693,751		4,422,643

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 30.00 2.04

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 381 METERS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 37-R1.5						
NET SALVAGE PERCENT: 0						
1917	20.40	20	20			
1919	36.39	36	36			
1920	48.56	49	49			
1922	49.17	49	49			
1923	18.83	19	19			
1924	38.81	39	39			
1929	19.21	19	19			
1931	29.27	29	29			
1938	43.02	43	43			
1944	81.91	82	82			
1945	10.44	10	10			
1946	75.19	75	75			
1949	375.12	375	375			
1950	1,494.29	1,494	1,494			
1951	768.68	769	769			
1952	586.54	584	587			
1953	2,401.79	2,377	2,402			
1954	731.85	720	732			
1955	679.64	668	680			
1956	266.15	260	266			
1957	3,341.95	3,239	3,332	10	2.00	5
1958	4,423.01	4,283	4,406	17	2.13	8
1959	3,147.95	3,024	3,111	37	2.64	14
1960	3,519.56	3,376	3,473	47	2.76	17
1961	2,570.62	2,461	2,532	39	2.79	14
1962	8,258.79	7,888	8,115	144	3.00	48
1963	7,681.30	7,268	7,477	204	3.52	58
1964	3,002.71	2,832	2,913	90	3.75	24
1965	9,263.05	8,706	8,956	307	3.84	80
1966	7,313.04	6,846	7,043	270	4.03	67
1967	9,638.26	8,983	9,241	397	4.27	93
1968	7,711.81	7,152	7,358	354	4.48	79
1969	5,186.45	4,785	4,923	263	4.70	56
1970	10,668.21	9,785	10,066	602	4.98	121
1971	8,332.87	7,595	7,813	520	5.25	99
1972	10,274.66	9,301	9,568	707	5.57	127
1973	9,623.04	8,648	8,897	726	5.90	123
1974	122,877.00	109,582	112,733	10,144	6.22	1,631
1975	162,777.40	144,774	148,938	13,839	6.25	2,214
1976	59,087.45	52,091	53,589	5,498	6.61	832
1977	121,609.85	106,202	109,256	12,354	7.00	1,765
1978	38,724.25	33,667	34,635	4,089	7.10	576
1979	156,100.80	134,278	138,140	17,961	7.52	2,388
1980	123,387.88	104,966	107,985	15,403	7.94	1,940
1981	166,695.28	140,891	144,943	21,752	8.10	2,685
1982	73,774.21	61,579	63,350	10,424	8.56	1,218
1983	82,636.14	68,431	70,399	12,237	8.77	1,395
1984	135,321.26	110,530	113,709	21,612	9.25	2,336
1985	119,614.99	96,769	99,552	20,063	9.50	2,112
1986	80,043.05	64,090	65,933	14,110	9.77	1,444
1987	102,689.51	80,919	83,246	19,444	10.29	1,890
1988	203,669.98	158,557	163,117	40,553	10.60	3,826
1989	151,937.36	116,764	120,122	31,815	10.92	2,913

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 381 METERS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 37-R1.5						
NET SALVAGE PERCENT: 0						
1990	82,722.88	62,406	64,201	18,522	11.48	1,613
1991	133,866.89	99,490	102,351	31,516	11.83	2,664
1992	172,987.12	126,540	130,179	42,808	12.20	3,509
1993	262,431.17	188,740	194,168	68,263	12.59	5,422
1994	79,856.41	56,395	58,017	21,839	13.00	1,680
1995	139,966.98	96,955	99,743	40,224	13.42	2,997
1996	146,420.48	98,936	101,781	44,639	14.04	3,179
1997	188,139.94	124,361	127,937	60,203	14.49	4,155
1998	140,596.22	90,797	93,408	47,188	14.95	3,156
1999	158,897.54	100,105	102,984	55,914	15.42	3,626
2000	103,421.24	63,718	65,550	37,871	15.73	2,408
2001	153,521.72	91,960	94,605	58,917	16.23	3,630
2002	12,686.25	7,373	7,585	5,101	16.72	305
2003	36,423.01	20,503	21,093	15,330	17.28	887
2004	230,676.63	125,488	129,097	101,580	17.81	5,704
2005	318,223.99	167,545	172,363	145,861	18.21	8,010
2006	180,813.20	91,546	94,179	86,634	18.77	4,616
2007	357,754.62	174,334	179,348	178,407	19.20	9,292
2008	335,744.84	156,961	161,475	174,270	19.65	8,869
2009	548,263.66	245,019	252,065	296,199	20.11	14,729
2010	346,041.54	147,241	151,476	194,566	20.59	9,450
2011	118,299.66	47,710	49,082	69,218	21.08	3,284
2012	275,238.56	104,673	107,683	167,556	21.59	7,761
2013	439,868.28	157,341	161,866	278,002	22.00	12,636
2014	665,959.89	222,497	228,896	437,064	22.42	19,494
2015	1,079,894.76	334,335	343,950	735,945	22.86	32,194
2016	484,329.31	137,985	141,953	342,376	23.22	14,745
2017	809,696.90	210,440	216,492	593,205	23.50	25,243
2018	608,444.11	142,011	146,095	462,349	23.81	19,418
2019	443,099.18	91,367	93,995	349,104	24.05	14,516
2020	498,492.15	88,732	91,284	407,208	24.25	16,792
2021	1,164,991.83	173,351	178,336	986,656	24.32	40,570
2022	791,722.10	93,661	96,355	695,367	24.22	28,710
2023	881,761.35	75,831	78,012	803,749	23.93	33,588
2025	2,423,573.53	80,220	82,527	2,341,047	21.93	106,751
	16,837,506.89	5,994,546	6,166,777	10,670,730		507,801

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 21.00 3.02

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 382 METER INSTALLATIONS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
1925	15.00	14	15			
1966	14,586.39	10,976	12,671	1,915	19.54	98
1967	33,587.68	25,043	28,910	4,678	19.91	235
1968	33,863.01	25,008	28,870	4,993	20.30	246
1969	34,362.54	25,126	29,006	5,357	20.68	259
1970	48,273.09	34,940	40,336	7,937	21.05	377
1971	82,971.82	59,416	68,592	14,380	21.49	669
1972	123,495.96	88,127	101,736	21,760	21.38	1,018
1973	152,803.99	107,788	124,434	28,370	21.82	1,300
1974	84,502.74	58,898	67,994	16,509	22.28	741
1975	33,999.53	23,405	27,019	6,981	22.74	307
1976	56,795.49	38,598	44,559	12,236	23.22	527
1977	90,787.12	60,891	70,294	20,493	23.69	865
1978	46,117.36	30,723	35,468	10,649	23.66	450
1979	48,753.22	32,021	36,966	11,787	24.15	488
1980	58,899.19	38,114	44,000	14,899	24.67	604
1981	59,302.03	38,048	43,924	15,378	24.72	622
1982	57,525.17	36,321	41,930	15,595	25.23	618
1983	64,948.06	40,339	46,569	18,379	25.78	713
1984	62,662.92	38,513	44,461	18,202	25.86	704
1985	72,081.63	43,523	50,244	21,838	26.41	827
1986	67,766.89	40,430	46,674	21,093	26.53	795
1987	66,670.25	39,015	45,040	21,630	27.11	798
1988	80,832.17	46,672	53,879	26,953	27.25	989
1989	64,256.60	36,337	41,948	22,309	27.85	801
1990	58,215.34	32,426	37,434	20,781	28.04	741
1991	61,546.26	33,518	38,694	22,852	28.64	798
1992	56,584.92	30,290	34,968	21,617	28.86	749
1993	55,227.22	29,033	33,517	21,710	29.10	746
1994	47,565.63	24,525	28,312	19,254	29.35	656
1995	45,485.84	22,979	26,528	18,958	29.62	640
1996	46,095.56	22,651	26,149	19,947	30.27	659
1997	72,074.48	34,610	39,955	32,119	30.59	1,050
1998	52,019.85	24,522	28,309	23,711	30.56	776
1999	68,091.15	31,281	36,112	31,979	30.90	1,035
2000	74,646.60	33,360	38,512	36,135	31.26	1,156
2001	48,056.36	20,861	24,082	23,974	31.63	758
2002	61,713.49	26,117	30,150	31,563	31.69	996
2003	58,656.01	24,014	27,722	30,934	32.09	964
2004	44,691.88	17,761	20,504	24,188	32.21	751
2005	43,914.37	16,898	19,508	24,406	32.37	754
2006	46,100.32	17,126	19,771	26,329	32.55	809
2007	45,134.22	16,145	18,638	26,496	32.75	809
2008	48,060.00	16,499	19,047	29,013	33.01	879
2009	48,930.00	16,142	18,635	30,295	33.00	918
2010	40,710.00	12,852	14,837	25,873	33.04	783
2011	41,565.00	12,499	14,429	27,136	33.13	819
2012	43,290.00	12,333	14,237	29,053	33.24	874
2013	43,125.00	11,622	13,417	29,708	33.19	895
2014	36,735.00	9,298	10,734	26,001	33.21	783
2015	41,100.00	9,732	11,235	29,865	33.04	904
2016	53,550.00	11,738	13,550	40,000	32.95	1,214
2017	41,745.00	8,403	9,701	32,044	32.73	979

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 382 METER INSTALLATIONS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
2018	42,720.00	7,805	9,010	33,710	32.44	1,039
2019	46,860.00	7,676	8,861	37,999	31.93	1,190
2020	36,615.00	5,247	6,057	30,558	31.37	974
2021	41,070.00	5,011	5,785	35,285	30.60	1,153
2022	60,780.00	6,005	6,932	53,848	29.64	1,817
2023	47,580.00	3,521	4,065	43,515	28.15	1,546
2024	44,085.00	2,037	2,352	41,733	25.78	1,619
2025	39,480.00	1,216	1,404	38,076	23.64	1,611
	3,323,679.35	1,636,039	1,888,692	1,434,988		49,895

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 28.80 1.50

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 384 HOUSE REGULATOR INSTALLATIONS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
1964	0.15					
1966	3,452.71	2,598	3,269	184	20.44	9
1967	4,471.87	3,334	4,195	277	19.79	14
1968	3,291.41	2,431	3,059	232	21.09	11
1969	3,257.36	2,382	2,997	260	20.00	13
1970	5,257.73	3,806	4,789	469	21.32	22
1971	7,171.43	5,135	6,462	709	21.48	33
1972	9,623.77	6,868	8,642	982	21.35	46
1973	15,660.79	11,047	13,901	1,760	21.73	81
1974	28,322.96	19,741	24,841	3,482	22.32	156
1975	13,106.44	9,022	11,353	1,753	22.77	77
1976	8,205.28	5,576	7,016	1,189	23.31	51
1977	28,406.93	19,053	23,975	4,432	23.70	187
1978	8,688.47	5,788	7,283	1,405	23.81	59
1979	499.31	328	413	86	21.50	4
1980	6,704.98	4,339	5,460	1,245	24.90	50
1981	14,086.80	9,038	11,373	2,714	24.67	110
1982	11,397.50	7,196	9,055	2,342	25.18	93
1983	17,239.72	10,708	13,474	3,766	25.79	146
1984	16,483.45	10,131	12,748	3,735	25.94	144
1985	17,490.79	10,561	13,289	4,202	26.43	159
1986	19,471.59	11,617	14,618	4,854	26.52	183
1987	18,627.95	10,901	13,717	4,911	27.13	181
1988	20,489.85	11,831	14,887	5,603	27.20	206
1989	19,972.52	11,294	14,211	5,762	27.84	207
1990	14,237.76	7,930	9,979	4,259	28.02	152
1991	16,495.12	8,983	11,304	5,191	28.68	181
1992	13,859.87	7,419	9,335	4,525	28.82	157
1993	17,450.68	9,174	11,544	5,907	29.10	203
1994	14,023.13	7,230	9,098	4,925	29.32	168
1995	12,966.42	6,551	8,243	4,723	29.70	159
1996	18,134.48	8,911	11,213	6,921	30.22	229
1997	31,715.36	15,230	19,164	12,551	30.61	410
1998	21,852.78	10,301	12,962	8,891	30.55	291
1999	33,600.66	15,436	19,423	14,178	30.89	459
2000	37,449.80	16,736	21,059	16,391	31.22	525
2001	25,789.95	11,195	14,087	11,703	31.63	370
2002	33,683.49	14,255	17,937	15,746	31.68	497
2003	32,037.99	13,116	16,504	15,534	32.10	484
2004	23,427.69	9,310	11,715	11,713	32.18	364
2005	22,946.59	8,830	11,111	11,836	32.34	366
2006	24,191.65	8,987	11,309	12,883	32.53	396
2007	24,810.50	8,875	11,168	13,642	32.79	416
2008	26,189.69	8,991	11,314	14,876	32.98	451
2009	25,565.97	8,434	10,613	14,953	33.01	453
2010	21,651.67	6,835	8,601	13,051	33.04	395
2011	21,865.03	6,575	8,273	13,592	33.15	410
2012	21,666.94	6,173	7,768	13,899	33.25	418
2013	19,870.62	5,355	6,738	13,133	33.16	396
2014	19,400.00	4,910	6,178	13,222	33.22	398
2015	22,330.00	5,288	6,654	15,676	33.07	474
2016	29,850.00	6,543	8,233	21,617	32.95	656
2017	22,530.00	4,535	5,706	16,824	32.73	514

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 384 HOUSE REGULATOR INSTALLATIONS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R0.5						
NET SALVAGE PERCENT: 0						
2018	23,500.00	4,293	5,402	18,098	32.43	558
2019	27,420.00	4,491	5,651	21,769	31.92	682
2020	21,230.00	3,042	3,828	17,402	31.35	555
2021	24,690.00	3,012	3,790	20,900	30.60	683
2022	35,310.00	3,489	4,390	30,920	29.65	1,043
2023	27,540.00	2,038	2,565	24,975	28.16	887
2024	25,420.00	1,174	1,477	23,943	25.77	929
2025	22,940.00	707	890	22,050	23.63	933
	1,159,025.60	469,079	590,253	568,773		18,904

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 30.10 1.63

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 385 INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R2						
NET SALVAGE PERCENT: 0						
1929	112.21	110	112			
1930	45.42	45	45			
1933	852.08	825	852			
1937	172.79	166	173			
1938	1,548.83	1,487	1,549			
1939	372.53	357	373			
1940	291.48	276	291			
1941	448.60	423	449			
1945	527.37	491	527			
1946	326.85	303	327			
1947	1,500.91	1,386	1,501			
1948	83.45	77	83			
1949	655.94	600	656			
1950	254.14	231	254			
1951	262.55	238	263			
1952	346.43	312	346			
1953	6,278.08	5,670	6,278			
1955	7,075.28	6,313	7,075			
1956	125.27	111	125			
1957	934.49	823	934			
1958	4,901.27	4,285	4,901			
1959	3,743.02	3,249	3,743			
1960	3,492.90	3,031	3,493			
1961	1,094.73	943	1,095			
1962	1,625.12	1,388	1,622	3		
1963	4,880.15	4,132	4,828	52	10.40	5
1964	2,595.57	2,178	2,545	51	12.75	4
1965	1,284.78	1,076	1,257	28	14.00	2
1966	35,962.63	29,831	34,855	1,108	12.18	91
1967	35,290.17	28,984	33,866	1,424	12.71	112
1968	43,489.25	35,357	41,312	2,177	13.19	165
1969	61,640.42	49,929	58,339	3,301	13.20	250
1970	55,063.98	44,112	51,542	3,522	13.70	257
1971	50,525.57	40,016	46,756	3,770	14.23	265
1972	29,021.97	22,718	26,544	2,478	14.75	168
1973	31,719.74	24,694	28,853	2,867	14.85	193
1974	32,489.26	24,978	29,185	3,304	15.44	214
1975	20,382.92	15,467	18,072	2,311	15.94	145
1976	17,680.11	13,322	15,566	2,114	16.14	131
1977	13,120.05	9,748	11,390	1,730	16.63	104
1978	43,482.11	31,846	37,210	6,272	17.28	363
1979	49,398.21	35,641	41,644	7,754	17.87	434
1980	65,547.30	46,866	54,760	10,787	18.04	598
1981	51,349.15	36,129	42,214	9,135	18.64	490
1982	78,871.07	54,579	63,772	15,099	19.26	784
1983	27,730.22	18,979	22,176	5,554	19.49	285
1984	73,224.20	49,236	57,529	15,695	20.10	781
1985	87,903.14	58,025	67,798	20,105	20.73	970
1986	239,579.98	156,110	182,404	57,176	20.99	2,724
1987	174,266.46	111,321	130,071	44,195	21.63	2,043
1988	252,110.37	157,771	184,345	67,765	22.27	3,043
1989	301,000.00	185,476	216,716	84,284	22.58	3,733
1990	389,712.40	234,919	274,487	115,225	23.23	4,960

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 385 INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 55-R2						
NET SALVAGE PERCENT: 0						
1991	300,700.04	177,142	206,978	93,722	23.89	3,923
1992	276,816.37	160,166	187,143	89,673	24.22	3,702
1993	329,202.79	185,802	217,097	112,106	24.89	4,504
1994	392,499.68	217,092	253,657	138,843	25.25	5,499
1995	506,074.93	272,471	318,364	187,711	25.93	7,239
1996	670,477.41	351,062	410,192	260,285	26.61	9,781
1997	518,106.87	264,908	309,527	208,580	27.00	7,725
1998	457,515.72	226,928	265,150	192,366	27.69	6,947
1999	505,356.48	244,087	285,199	220,157	28.10	7,835
2000	272,781.96	127,416	148,877	123,905	28.81	4,301
2001	256,232.63	116,201	135,773	120,460	29.22	4,123
2002	618,063.07	270,155	315,657	302,406	29.94	10,100
2003	213,986.29	90,473	105,711	108,275	30.38	3,564
2004	407,289.90	166,174	194,163	213,127	30.83	6,913
2005	141,690.28	55,373	64,699	76,991	31.55	2,440
2006	236,932.67	88,945	103,926	133,007	32.03	4,153
2007	459,077.88	165,038	192,835	266,243	32.51	8,190
2008	349,492.74	119,387	139,495	209,998	33.25	6,316
2009	277,220.21	90,097	105,272	171,948	33.75	5,095
2010	248,193.50	76,444	89,320	158,874	34.26	4,637
2011	214,207.49	62,270	72,758	141,449	34.77	4,068
2012	449,360.32	122,675	143,337	306,023	35.29	8,672
2013	925,312.44	235,770	275,481	649,831	35.83	18,137
2014	311,863.37	73,662	86,069	225,794	36.37	6,208
2015	399,855.88	87,289	101,991	297,865	36.70	8,116
2016	361,675.14	71,937	84,053	277,622	37.26	7,451
2017	313,589.55	56,383	65,880	247,710	37.62	6,585
2018	712,675.02	114,171	133,401	579,274	38.00	15,244
2019	1,023,746.37	143,324	167,464	856,282	38.39	22,305
2020	399,401.73	47,808	55,860	343,542	38.61	8,898
2021	323,849.29	31,932	37,310	286,539	38.85	7,376
2022	102,779.81	7,914	9,247	93,533	38.96	2,401
2023	787,056.59	43,209	50,487	736,570	38.73	19,018
2024	715,654.66	22,901	26,759	688,896	37.81	18,220
2025	968,791.12	19,376	22,639	946,152	36.84	25,683
	17,753,923.12	6,162,562	7,198,874	10,555,049		318,683

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 33.10 1.80

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 390.11 OTHER SMALL STRUCTURES
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE: IOWA 40-R0.5						
NET SALVAGE PERCENT: 0						
1947	445.61	439	164	282	1.11	254
1951	225.96	218	82	144	2.67	54
1952	187.86	180	67	121	3.10	39
1957	1,284.98	1,193	446	839	5.28	159
1958	876.12	807	302	574	5.74	100
1960	1,195.44	1,092	409	786	6.19	127
1961	829.50	751	281	548	6.68	82
1965	739.81	651	244	496	8.27	60
1976	2,363.05	1,897	710	1,653	12.07	137
1984	2,571.41	1,888	707	1,864	14.91	125
1988	1,005.19	700	262	743	16.15	46
1990	137.81	93	35	103	17.17	6
2000	3,572.71	1,966	736	2,837	20.56	138
2001	3,821.89	2,048	766	3,056	20.93	146
2010	822.53	324	121	702	23.40	30
2018	5,837.83	1,354	507	5,331	24.01	222
2021	82,162.78	12,785	4,784	77,379	23.07	3,354
2025	1,304,025.81	52,291	19,569	1,284,457	17.94	71,597
	1,412,106.29	80,677	30,192	1,381,914		76,676

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 18.00 5.43

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 391.1 OFFICE FURNITURE AND EQUIPMENT - FURNITURE
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 25-SQUARE						
NET SALVAGE PERCENT: 0						
2000	3,243.14	3,243	3,243			
2006	23,544.56	18,129	21,306	2,239	5.76	389
2007	1,840.83	1,344	1,580	261	6.69	39
2008	43,435.12	29,970	35,222	8,213	7.75	1,060
2010	9,808.61	5,983	7,031	2,778	9.75	285
2011	5,186.58	2,956	3,474	1,713	10.77	159
2013	12,460.86	6,106	7,176	5,285	12.73	415
2014	26,836.01	12,076	14,192	12,644	13.74	920
2016	9,333.30	3,453	4,058	5,275	15.75	335
2017	5,476.94	1,807	2,124	3,353	16.77	200
2018	26,642.62	7,726	9,080	17,563	17.76	989
2019	30,278.31	7,570	8,897	21,381	18.76	1,140
2020	21,253.10	4,463	5,245	16,008	19.74	811
2021	6,504.26	1,106	1,300	5,204	20.73	251
2022	11,912.96	1,549	1,820	10,093	21.75	464
2023	29,698.89	2,673	3,142	26,557	22.76	1,167
	267,456.09	110,154	128,890	138,566		8,624

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 16.10 3.22

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 391.2 OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 15-SQUARE						
NET SALVAGE PERCENT: 0						
2010	147,478.70	147,479	147,479			
2011	23,261.72	22,099	23,262			
2012	7,178.49	6,341	7,178			
2013	36,982.54	30,203	36,983			
2016	3,101.70	1,913	3,101	1		
	218,003.15	208,035	218,003			
COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT ..					0.00	0.00

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 391.3 OFFICE FURNITURE AND EQUIPMENT - COMPUTERS
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 5-SQUARE						
NET SALVAGE PERCENT: 0						
2020	1,119,045.24	1,119,045	1,119,045			
2021	1,303,390.71	1,107,882	935,631	367,760	1.00	367,760
2023	2,592,373.85	1,166,568	985,192	1,607,182	2.75	584,430
2024	246,095.08	61,524	51,958	194,137	3.75	51,770
2025	2,211,955.35	331,793	280,207	1,931,749	4.25	454,529
	7,472,860.23	3,786,812	3,372,033	4,100,827		1,458,489

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 2.80 19.52

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 394 TOOLS, SHOP AND GARAGE EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 25-SQUARE						
NET SALVAGE PERCENT: 0						
2000	80,856.78	80,857	80,857			
2001	75,426.35	73,164	72,630	2,796	1.00	2,796
2002	65,639.79	61,045	60,600	5,040	1.75	2,880
2003	26,498.97	23,584	23,412	3,087	2.75	1,123
2004	141,628.51	120,384	119,506	22,123	3.75	5,899
2005	95,477.20	77,337	76,773	18,704	4.75	3,938
2006	55,377.89	42,641	42,330	13,048	5.75	2,269
2007	72,167.11	52,682	52,298	19,869	6.75	2,944
2008	87,428.76	60,326	59,886	27,543	7.75	3,554
2009	61,254.65	39,816	39,525	21,730	8.75	2,483
2010	59,267.88	36,153	35,889	23,379	9.75	2,398
2011	64,734.21	36,898	36,629	28,105	10.75	2,614
2012	158,725.32	84,124	83,510	75,215	11.75	6,401
2013	80,839.05	39,611	39,322	41,517	12.75	3,256
2014	205,098.35	92,294	91,620	113,478	13.75	8,253
2015	444,762.89	182,353	181,022	263,741	14.75	17,881
2016	174,477.56	64,557	64,086	110,392	15.75	7,009
2017	500,397.48	165,131	163,926	336,471	16.75	20,088
2018	303,590.52	88,041	87,399	216,192	17.75	12,180
2019	364,694.67	91,174	90,509	274,186	18.75	14,623
2020	479,303.99	100,654	99,919	379,385	19.75	19,209
2021	428,877.05	72,909	72,377	356,500	20.75	17,181
2022	1,941,234.68	252,361	250,519	1,690,716	21.75	77,734
2023	752,229.28	67,701	67,207	685,022	22.75	30,111
2024	518,146.80	25,907	25,718	492,429	23.75	20,734
2025	1,188,459.98	35,654	35,394	1,153,066	24.25	47,549
	8,426,595.72	2,067,358	2,052,863	6,373,733		335,107

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 19.00 3.98

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
ACCOUNT 397 COMMUNICATION EQUIPMENT
CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL
RELATED TO ORIGINAL COST AS OF SEPTEMBER 30, 2025

YEAR (1)	ORIGINAL COST (2)	CALCULATED ACCRUED (3)	ALLOC. BOOK RESERVE (4)	FUTURE BOOK ACCRUALS (5)	REMAINING LIFE (6)	ANNUAL ACCRUAL (7)
SURVIVOR CURVE.. 10-SQUARE						
NET SALVAGE PERCENT: 0						
2008	10,074.13	10,074	10,074			
2015	207,313.25	207,313	207,313			
2016	1,043,456.96	965,198	938,758	104,699	1.00	104,699
2017	309,456.84	255,302	248,308	61,149	1.75	34,942
2018	245,841.64	178,235	173,353	72,489	2.75	26,360
2019	231,811.32	144,882	140,913	90,898	3.75	24,239
2020	302,121.56	158,614	154,269	147,853	4.75	31,127
2021	158,338.81	67,294	65,451	92,888	5.75	16,154
2022	327,547.58	106,453	103,537	224,011	6.75	33,187
2023	433,401.15	97,515	94,844	338,557	7.75	43,685
2024	64,958.62	8,120	7,898	57,061	8.75	6,521
2025	1,062,632.59	79,697	77,513	985,120	9.25	106,499
	4,396,954.45	2,278,697	2,222,231	2,174,724		427,413

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 5.10 9.72

PART III. EXPERIENCED NET SALVAGE

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
EXPERIENCED RETIREMENTS BY ACCOUNT AND ASSOCIATED
COST OF REMOVAL, GROSS SALVAGE AND NET SALVAGE

ACCT	REGULAR RETIREMENTS	COST OF REMOVAL	GROSS SALVAGE	NET SALVAGE
2021	**TRANSACTION YEAR**			
332.00				
334.00	17,779	4,911		(4,911)
366.20				
367.10	108,205	117,442		(117,442)
367.20	13,234	220		(220)
369.00	64,747	15,090		(15,090)
374.10				
374.20				
375.00	47,296	72,183		(72,183)
376.10	1,065,213	754,657		(754,657)
376.20	21,942	555		(555)
378.00	133,928	48,113		(48,113)
380.00	2,259,986	482,042		(482,042)
385.00	55,368	13,721		(13,721)
390.11				
TOTAL	**5,224,226**	**1,508,932**		**(1,508,932)**
2022	**TRANSACTION YEAR**			
332.00				
334.00	19,360	4,971		(4,971)
366.20				
367.10	4,134	28,764		(28,764)
367.20		198		(198)
369.00	6,408	5,433		(5,433)
374.10	323			
374.20				
375.00	104,271	66,671		(66,671)
376.10	905,488	671,968	24,600	(647,368)
376.20				
378.00	176,772	91,460		(91,460)
380.00	1,711,332	268,818		(268,818)
385.00	15,946	12,608	2	(12,606)
390.11				
TOTAL	**5,853,408**	**1,150,890**	**24,603**	**(1,126,287)**
2023	**TRANSACTION YEAR**			
332.00				
334.00	32,094	1,449		(1,449)
366.20				
367.10	3,394	5,666		(5,666)
367.20	21,245	979		(979)
369.00	36,002	8,681		(8,681)
374.10	3,653	6,697	11,154	4,457
374.20	1,133	457		(457)
375.00	244,170	154,258	50	(154,208)
376.10	1,696,263	859,668	4,017	(855,651)
376.20	5,497	2,272		(2,272)
378.00	225,387	38,866		(38,866)
380.00	1,816,644	274,337		(274,337)
385.00	36,721	10,669		(10,669)
390.11		852		(852)
TOTAL	**6,003,860**	**1,364,851**	**15,221**	**(1,349,630)**
2024	**TRANSACTION YEAR**			

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
EXPERIENCED RETIREMENTS BY ACCOUNT AND ASSOCIATED
COST OF REMOVAL, GROSS SALVAGE AND NET SALVAGE

ACCT	REGULAR RETIREMENTS	COST OF REMOVAL	GROSS SALVAGE	NET SALVAGE
332.00				
334.00	37,849	5,218		(5,218)
366.20	249	1,203		(1,203)
367.10	386,685	57,624		(57,624)
367.20	9,423	219		(219)
369.00	2,510	6,731		(6,731)
374.10	2,952	12,578	(10,169)	(22,747)
374.20				
375.00	63,071	34,622		(34,622)
376.10	1,924,230	1,694,252	16,962	(1,677,291)
376.20	9,148	45		(45)
378.00	186,640	36,322		(36,322)
380.00	1,992,351	359,988		(359,988)
385.00	9,607	49,517	1	(49,516)
390.11				
TOTAL	**7,494,915**	**2,258,317**	**6,794**	**(2,251,523)**
2025	**TRANSACTION YEAR**			
332.00				
334.00	44,208	8,333		(8,333)
366.20				
367.10	284,617	121,648		(121,648)
367.20		455		(455)
369.00	19,585	10,377		(10,377)
374.10	831	2,974		(2,974)
374.20	978	1,597		(1,597)
375.00	55,285	45,561		(45,561)
376.10	2,008,866	1,165,857		(1,165,857)
376.20				
378.00	399,560	99,189		(99,189)
380.00	2,325,865	523,729		(523,729)
385.00	63,849	26,737		(26,737)
390.11				
TOTAL	**8,364,564**	**2,006,455**		**(2,006,455)**
TOTAL	**32,940,974**	**8,289,445**	**46,617**	**(8,242,827)**

BOOK VII

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

BEFORE

THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Information Submitted Pursuant to

Section 53.51 et seq of the Commission's Regulations

NATIONAL FUEL EXHIBIT F
CURRENT TARIFF

NATIONAL FUEL EXHIBIT F
PROPOSED TARIFF

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
GAS - PA P.U.C. NO. 9
SUPPLEMENT NO. 294

DOCKET NO. R-2025-3059428

Issued: January 28, 2026 **Effective: March 29, 2026**

NATIONAL FUEL EXHIBIT F

Section 1 - Current Tariff

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
BUFFALO, NEW YORK

RATES, RULES AND REGULATIONS

GOVERNING THE FURNISHING

OF

NATURAL GAS SERVICE

IN
TERRITORY DESCRIBED HEREIN

Issued: December 19, 2025 Effective: January 1, 2026

M. D. Colpoys, PRESIDENT
BUFFALO, NEW YORK

This Supplement includes an increase to the Distribution System Improvement Charge ("DSIC") rate.
See page 2.

LIST OF CHANGES MADE BY THIS TARIFF

INCREASE:

1. The Distribution System Improvement Charge ("DSIC") increases. Page 172.

LIST OF CHANGES MADE BY THIS TARIFF

DECREASE: (cont'd)

9. SATC Transportation Service rates decrease for Residential and Small Volume Industrial.
Page 119A, 120, and 121.

10. SATC Alternative Capacity Release Rate decrease.
Page 127.

11. CAP rate discount in Rider F decreases.
Page 164 and 167.

12. The Merchant Function Charge in Rider G decrease.
Pages 168 and 169.

13. Purchased gas costs in Rider A and the Price to Compare shown in Rider H decrease.
Page 169.

LIST OF CHANGES MADE BY THIS TARIFF

INCREASES (continued)

21. POR Discounts increase for Non-Residential.
Page 125

22. DMLMT Service Distribution charge increases.
Page 146C

23. Rider F – LIRA Discount Charge, increase in Current LIRA
Page 164 and 167

24. Rider G – Merchant Function Charge Rider, increase in Residential Service and Non-residential Service rates.
Page 168

25. Rider H – Gas Procurement Charge
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RESERVED FOR FUTURE USE

RESERVED FOR FUTURE USE

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TERRITORY COVERED BY THIS TARIFF

County	Cities	Boroughs	Townships		
Armstrong			Bradys Bend	Perry	Washington
Armstrong			East Franklin	Sugarcreek	West Franklin
Butler		Chicora	Adams	Fairview	Summit
Butler		Karns City	Allegheny	Forward	Venango
Butler		Mars	Center	Oakland	Washington
Butler		Petrolia	Concord	Parker	
Butler			Donegal	Penn	
Cameron	Emporium	Shippen			
Clarion	Clarion	Ashland	Highland	Paint	
Clarion	East Brady	Beaver	Knox	Perry	
Clarion	Strattanville	Brady	Limestone	Salem	
Clarion		Clarion	Madison	Washington	
Clarion		Elk	Millcreek		
Clarion		Farmington	Monroe		
Clearfield	DuBois	Falls Creek	Brady	Huston	Sandy
Crawford	Meadville	Blooming Valley	Cambridge	Summerhill	
Crawford	Titusville	Cambridge	Conneaut	Summit	
Crawford		Springs East	Fairfield	Venango	
Crawford		Cochranton	East Mead	Vernon	
Crawford		Conneaut Lake	Fairfield	Wayne	
Crawford		Conneautville	Greenwood	Woodcock	
Crawford		Hydetown	Hayfield	West Mead	
Crawford		Linesville	Oil Creek		
Crawford		Saegertown	Pine		
Crawford			Randolph		
Crawford		Springboro	Richmond		
Crawford		Townville	Sadsbury		
Crawford		Venango South	Shenango		
Crawford		Woodcock	Spring		
Crawford			Steuben		
Elk	St. Marys	Johnsonburg	Fox	Jay	Ridgway
Elk		Ridgway	Highland	Jones	Spring Creek
Elk			Horton	Millstone	
Erie	Corry	Albion	Amity	McKean	
Erie	Erie	Cranesville	Concord	Millcreek	
Erie		E. Springfield	Conneaut	North East	
Erie		Edinboro	Elk Creek	Springfield	
Erie		Elgin	Fairview	Summit	
Erie		Fairview	Franklin	Union	
Erie		Girard	Girard	Venango	
Erie		Lake City	Greene	Waterford	
Erie		Middleboro	Greenfield	Wayne	
Erie		Mill Village	Harborcreek	Washington	
Erie		Platea	Lawrence Park		
Erie		Union City	Leboeuf		
Erie		Waterford			
Erie		Wattsburg			
Erie		Wesleyville			

(C)

(C) Indicates Change

TERRITORY COVERED BY THIS TARIFF
(Continued)

County	Cities	Boroughs	Townships			
Forest			Barnett	Hickory	Jenks	
Forest			Green	Howe	Kingsley	
Forest			Harmony			
Jefferson		Brockway	Barnett	Knox	Union	
Jefferson		Brookville	Beaver	Pinecreek	Warsaw	
Jefferson		Corsica Clover	Polk	Washington		
Jefferson		Falls Creek	Eldred	Rose	Winslow	
Jefferson		Reynoldsville	Heath	Snyder		
Jefferson		Sykesville				
McKean	Bradford	Lewis Run	Bradford	Hamlin	Otto	
McKean		Smethport	Eldred	Keating	Sergeant	
McKean			Foster	Lafayette	Wetmore	
McKean			Hamilton	Norwich		
Mercer	Farrell Clarksville	Coolspring	Jefferson	Sugar Grove		(C)
Mercer	Hermitage	Fredonia	Delaware	Lackawannock	West Salem	
Mercer	Sharon	Greenville	E. Lackawannock	Lake	Worth	
Mercer		Jackson Center	Fairview	Perry		
Mercer		Jamestown	Findley	Pine		
Mercer		Mercer	French Creek	Pymatuning		
Mercer		Sharpsville	Green	Sandy Creek		
Mercer		Sheakleyville	Hempfield	Sandy Lake		
Mercer		West Middlesex	Hickory	Shenango		
Mercer		Wheatland	Jackson	South Pymatuning		
Venango	Franklin	Cooperstown	Canal	Irwin	President	
Venango	Oil City	Pleasantville	Cherrytree	Jackson	Richland	
Venango		Polk	Clinton	Mineral	Rockland	
Venango		Rouseville	Cornplanter	Oakland	Sandycreek	
Venango		Utica	Cranberry	Oilcreek	Scrubgrass	
Venengo			Frenchcreek	Pinegrove	Sugarcreek	
Warren	Warren	Clarendon	Brokenstraw	Freehold	Pittsfield	(C)
Warren		Sugar Grove	Columbus	Glade	Pleasant	
Warren		Tidioute	Conewango	Limestone	Sheffield	
Warren		Youngsville	Deerfield	Mead	Sugar Grove	
Warren			Farmington	Pine Grove	Triumph	

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED

1. RULES AND REGULATIONS

The customer's application for service, the Pennsylvania Public Utility Code and the rules and regulations promulgated by the Pennsylvania Public Utility Commission, as amended from time to time, and the rules and regulations contained herein are a part of the contract with each Customer, and each Customer agrees to be bound thereby.

2. APPLICATIONS FOR SERVICE

The Company may require any applicant for service to sign an application. Regardless of the manner in which an application is made, the acceptance of such application by the Company shall result in a contract service governed by Rule 1.

3. DETERMINATION OF COMPANY INVESTMENT FOR UPGRADE/EXTENSION OF FACILITIES

A. Maximum Company Investment Level

The Company investment for upgrade/extension of facilities for a firm gas customer shall be limited to an amount determined as follows:

Maximum Company Investment = Additional Annual Revenues x Justified Company Investment per Dollar of Additional Annual Revenue

B. Determination of Additional Annual Revenues

The Additional Annual Revenues are calculated as follows:

(1) The Company will estimate the customer's projected firm annual volumes as follows:

(a) Residential

For guideline purposes, the Company shall use annual gas consumption figures for gas space heating and for various gas appliances as shown below (These figures are based on current insulation standards as well as 92% efficient furnaces): (C)

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

3. DETERMINATION OF COMPANY INVESTMENT FOR UPGRADE/EXTENSION OF FACILITIES (Cont'd)

Gas Space Heating:
Single Family Home - [(square footage x .029) – 5.4] Mcf
Apartment/Condominium - [(square footage x .024) + 3.14] Mcf
Manufactured Home - [(square footage x .0267) + 6.98] Mcf

Gas Appliances:

Gas Water Heater – 20.4 Mcf
Gas Dryer – 3.6 Mcf
Gas Range – 7.6 Mcf
Other Gas Appliances – Determined by the Company on a case-by-case basis.

(b) Commercial or Public Authority: Industrial

The Company shall estimate projected firm annual volumes on a case-by-case basis.

(2) This annual volume is then distributed into 12 monthly amounts based on an average distribution in the appropriate revenue classification. (Alternatively, the customer's annual usage estimate may be distributed according to his own historic or projected monthly load profile pursuant to the Company's review and approval.)

(3) The appropriate rate schedule is applied to each monthly volume, and the results are added to produce annual gross revenues.

(4) For each monthly volume the costs shall be determined for the portion of monthly gross revenues for recovery of purchased gas costs pursuant to applicable provisions of Rider A to this tariff and the applicable rate schedule. (C)

The portion of monthly gross revenues for recovery of Purchased Gas Costs and Transition Costs for each month shall be added together to produce annual revenues for recovery of Purchased Gas Costs and Transition Costs.

(5) The amount calculated under item (4) above, shall be subtracted from the amount calculated under item (3) above.

(6) Additional annual revenues resulting from the upgrade/extension shall be determined by reducing the annual revenues for recovery of non-gas costs as calculated in (5) above, by the customer's currently generated annual revenues for recovery of non-gas costs, if any, as determined by the Company.

(C) Indicates Change
(D) Indicates Decrease
(I) Indicates Increase

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

3. DETERMINATION OF COMPANY INVESTMENT FOR UPGRADE/EXTENSION OF FACILITIES (Cont'd)

C. Determination of Justified Company Investment Per Dollar of Additional Annual Revenue

(1) Residential

The Justified Company Investment Per Dollar of Additional Annual Revenue for residential customers is $6.93. (I)

(2) Commercial and Public Authority; Industrial

The Justified Company Investment Per Dollar of Additional Annual Revenue for commercial, public authority or industrial customers shall be selected from the table below based upon the projected term of use by the customer of the new or upgraded facilities.

Projected Term of Use of New/Upgraded Facilities (Years)	Justified Company Investment Per Dollar of Additional Annual Revenue
1	$ 0.63
2	1.21
3	1.76
4	2.27
5	2.74
6	3.18
7	3.59
8	3.97
9	4.32
10	4.65
Greater than 10	6.93

(I)

Because the term of use has a substantial effect on the determination of the Justified Company Investment Per Dollar of Additional Annual Revenue, the Company may require a letter of intent from commercial, public authority and industrial customers projecting the term of use of the new or upgraded extension of facilities being requested.

The Company reserves the right to require a guaranteed revenue contract if the customer projects a term of use of the new or upgraded facilities in excess of 10 years or if the customer does not demonstrate that the customer's term of use is reasonable.

(D) Indicates Decrease

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

3. DETERMINATION OF COMPANY INVESTMENT FOR UPGRADE/EXTENSION OF FACILITIES (Cont'd)

Additionally, the Company reserves the right to require a guaranteed revenue contract from a commercial, public authority or industrial customer if any of the following conditions exist:

(1) The investment is for a dual fuel or partially dual fueled facility;

(2) The Company determines that a customer's financial status does not demonstrate that the customer will be able to pay bills for the projected term of use of the facilities; or

(3) The actual investment by the Company is greater than $50,000.

(3) Recomputation

The Company may recompute, modify, alter or amend the foregoing Justified Company Investment Per Dollar of Additional Annual Revenue amounts as the Company may deem necessary or convenient in the conduct of its business, provided, however, that such recomputation, modification, alteration or amendment shall not become effective unless and until included in this tariff. (C)

D. Application of Maximum Company Investment

The Maximum Company Investment as determined above shall be applied, first, to the installed meter cost, if any, and then will be applied towards any mainline and/or service line extension, service connection, and/or the upgrade of any of the Company's facilities to accommodate increased volumes of sales or transportation. However, if the Maximum Company Investment is less than the installed meter cost, Company will provide and install the meter at no cost to the Customer.

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

4. UPGRADE/EXTENSION OF FACILITIES

A. Residential

Whenever the owner or occupant of any property eligible for service as a residential customer makes a written application for service to the Company, and the Company has authority to render service to said applicant, the Company shall extend its facilities so as to serve said property or new residential development, provided that the applicant shall first have executed an agreement to pay to the company the rate charged under the appropriate service classification and to contribute to the cost of extending facilities, an amount equal to the difference between the total cost of construction of facilities less the Company's Maximum Investment (as calculated in Rule No. 3, above).

Income taxes, if any, paid with respect to the Contribution will be recorded in a deferred account and such taxes, less the income tax effect of depreciation received with respect to the property constructed with the Contribution, will be included in the Company's rate base in subsequent rate case proceedings.

B. Commercial or Public Authority; Industrial

Whenever the owner or occupant of any property eligible for service as a Commercial or Public Authority customer, or as an Industrial customer, makes a written application for service to the Company, and the Company has authority to render service to said applicant, the Company shall extend its system so as to serve said property, provided said applicant shall first have executed an agreement to pay to the Company the rates charged under the appropriate service classification and to contribute to the cost of extending facilities, an amount equal to the difference between the total cost of construction of facilities less the Company's Maximum Investment (as calculated in Rule No. 3, above).

Income taxes, if any, paid with respect to the Contribution will be recorded in a deferred account and such taxes, less the income tax effect of depreciation received with respect to the property constructed with the Contribution, will be included in the Company's rate base in subsequent rate case proceedings.

The Company's Maximum Investment for Commercial or Public Authority and Industrial customers shall equal the Maximum Company Investment as calculated in Rule No. 3 above; provided, however, that, in the event that the Company reasonably believes that the Company's installation of facilities will be completed substantially in advance of date that the Customer's use will equal projected annual volumes used to calculate the Maximum Company Investment as calculated in Rule No. 3 above, the Company may discount the Maximum Company

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

4. UPGRADE/EXTENSION OF FACILITIES (Cont'd)

Investment as calculated in Rule No. 3 above to present value based upon the Company's most recent Commission-approved fair rate of return. (C)

C. Developer/Builder - Residential

Whenever the Developer/Builder of a residential property eligible for service makes a written application for service to the Company, and the Company has authority to render service to the property to be developed, the Company shall extend its system to serve said property, provided that, if the cost to extend the facilities exceeds the Maximum Company Investment, as calculated below, the Developer/Builder shall have entered into an agreement to contribute to the cost of extending facilities. (C) (C) (C)

The Maximum Company Investment for extensions involving a Developer/Builder shall be calculated as follows:

(1) The Developer/Builder shall provide a reasonable schedule of unit completion within the property to be developed;

(2) The Maximum Company Investment shall be calculated (as provided in Section 3) separately based on the number of units scheduled to be completed:

(a) within twelve months from the date of the estimated completion of construction of the new facilities; and

(b) during each successive twelve month period following the date of the estimated completion of construction of the new facilities.

(3) For all units not scheduled for completion within twelve months from the estimated date of completion of the construction of the new facilities, the Maximum Company Investment, as calculated above, shall be discounted to present value at the projected date of the completion of Company installed facilities using the Company's most recent Commission-approved fair rate of return.

(4) The sum of the discounted Maximum Company Investment for units to be installed more than twelve months after construction of Company facilities and the Maximum Company Investment for units scheduled for completion within twelve months of the estimated date of completion of construction of Company facilities shall equal the total Maximum Company Investment for the extension.

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

4. UPGRADE/EXTENSION OF FACILITIES (Cont'd)

The Developer/Builder shall contribute to the cost of extending facilities, an amount equal to the difference between the total cost of construction of facilities less the Maximum Company Investment (as calculated above).

Income taxes, if any, paid with respect to the Contribution will be recorded in a deferred account and such taxes, less the income tax effect of depreciation received with respect to the property constructed with the Contribution, will be included in the Company's rate base in subsequent rate case proceedings.

In the event that the Developer/Builder does not achieve the projected annual completion rate, the Maximum Company Investment and the amount to be contributed will be recalculated, in the same manner stated above, based upon actual units completed. If the recalculated amount to be contributed is greater than the previously calculated amount to be contributed, the Developer/Builder will be required to pay such difference to the Company; provided, however, that no amount will be required to be paid if the recalculated amount to be contributed exceeds the Company's actual cost of construction less the recalculated Maximum Company Investment.

C1. Developer/Builder Commercial or Industrial

Whenever the Developer/Builder of a commercial or industrial property eligible for service makes a written application for service to the Company, and the Company has authority to render service to the property to be developed, the Company shall extend its system to serve said property, provided that, if the cost to extend the facilities exceeds the Maximum Company Investment, as calculated below, the Developer/Builder shall have entered into an agreement to contribute to the cost of extending facilities.

The Maximum Company Investment for extensions involving a Developer/Builder shall be calculated as follows:

(1) The Developer/Builder shall provide a reasonable schedule of customer attachments and projected additional annual revenues from volumes to be transported by or purchased from the Company and consumed by the attaching customers;

(2) The Maximum Company Investment shall be calculated (as provided in Section 3) separately based on the historical and projected additional annual revenues from volumes to be transported by or purchased from the Company and consumed by the attaching customers: (C)

(a) within twelve months from the date of the estimated completion of construction of the new facilities; and

(b) during each successive twelve month period following the date of the estimated completion of construction of the new facilities.

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

4. UPGRADE/EXTENSION OF FACILITIES (Cont'd)

(3) For all customer attachments not scheduled for completion within twelve months from the estimated date of completion of the construction of the new facilities, the Maximum Company Investment, as calculated above, shall be discounted to present value at the projected date of the completion of Company installed facilities using the Company's most recent Commission-approved fair rate of return. (C)

(4) The sum of the discounted Maximum Company Investment for customers to be attached more than twelve months after construction of Company facilities and the Maximum Company Investment for customer attachments scheduled for completion within twelve months of the estimated date of completion of construction of Company facilities shall equal the total Maximum Company Investment for the extension.

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

4. UPGRADE/EXTENSION OF FACILITIES (Cont'd)

The Developer/Builder shall contribute to the cost of extending facilities, an amount equal to the difference between the total cost of construction of facilities less the Maximum Company Investment (as calculated above).

Income taxes, if any, paid with respect to the Contribution will be recorded in a deferred account and such taxes, less the income tax effect of depreciation received with respect to the property constructed with the Contribution, will be included in the Company's rate base in subsequent rate case proceedings.

In the event that the Developer/Builder does not achieve the projected annual completion rate, the Maximum Company Investment and the amount to be contributed will be recalculated, in the same manner stated above, based upon actual additional annual revenues from volumes transported by or purchased from the Company and consumed by the attaching customers during the 60-month period following completion of the extension and the projected additional annual revenues from volumes to be transported by or purchased from the Company and consumed by the customers attached as of the last day of such 60-month period. If the recalculated amount to be contributed is greater than the previously calculated amount to be contributed, the Developer/Builder will be required to pay such difference to the Company; provided, however, that no amount will be required to be paid if the recalculated amount to be contributed exceeds the Company's actual cost of construction less the recalculated Maximum Company Investment.

D. Upgrade

The Company's investment for the upgrade of facilities shall be subject to the formula described in Rule No. 3. An upgrade is required when the customer needs dictate increasing, decreasing or otherwise changing the current service line, main line or meter size for the increased, decreased or otherwise changed volume or pressure requirements or when the customer requests installation of an excess flow valve or natural gas related equipment or facilities not otherwise required by regulation and the Company has deemed such installation appropriate. (C)

E. Advance Payment and Construction

Construction of any extension or installation of excess flow valves or natural gas related equipment or facilities not otherwise required by regulation will not be undertaken until the amount of the applicant's contribution has been paid to the Company by the applicant. In the case of an excess flow valve or natural gas related equipment or facilities not otherwise required by regulation, the amount of the applicant's contribution will be determined based upon the Company's cost to install such equipment. The actual construction of the extension shall be scheduled at the Company's discretion. (C) (C)

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

4. UPGRADE/EXTENSION OF FACILITIES (Cont'd)

F. Refunds of Customer Investment

Any customer attaching to a facility extended/upgraded within five (5) years of completion thereof will be required to contribute to the cost of the extension/upgrade in accordance with Rules 3 and 4. In the event a new customer attaches to an extension/upgrade of the Company's facilities paid for by a customer or a developer/builder, within five (5) years of the date of completion thereof, a pro rata refund will be made to customers or developer/builder who were charged for such extension. In the alternative, the customer or builder/developer and Distribution may mutually agree in writing that the refund, if any, shall equal the Company's Maximum Company Investment for the attaching customer less the Company's actual attachment cost of construction. An annual review of such extensions is made on the anniversary date of completion thereof, during said five (5) years, and any refunds due are made at that time except for extensions for a developer/builder of commercial or industrial property which shall be reviewed at the end of year five (5) and any refunds due will be made at that time. No refunds will be paid for attachments occurring more than five (5) years after the completion date and in no case will the aggregate amount of refunds to a customer or developer/builder exceed the amount which the customer or developer/builder paid for the mainline extension/upgrade. (C)

5. MAINTENANCE OF FACILITIES

After initial installation of facilities has been made, pursuant to Rule Nos. 3 and 4, above, all facilities including mains, customer service lines (i.e., the portion of the service line from the outlet of the Company's service stop cock to the inlet of the meter) and Company service lines (i.e. the portion of the service line from the gas main to and including the curb box and service stop cock), shall be maintained, replaced or renewed, as required, at the expense of the Company.

5A. SPECIAL UTILITY SERVICES

The provisions of Rules 3 and 4 do not apply to applications for special utility service. "Special utility service" shall include (a) a request for utility service when the applicant has an installed alternative fuel capability, including service from a natural gas well; (b) a request for utility service when the applicant is already receiving natural gas service from another Pennsylvania public utility; (c) a request for utility service from an applicant located in an area in which another natural gas utility is authorized to serve the applicant; (d) a request for utility service by an applicant who was the owner or ratepayer of record for the premises at the time the Company last provided service to the premises; (e) any request for service by an applicant who, in the Company's view, is unlikely to remain on the Company's system for a sufficient period of time to justify the extension. Applications for special utility service shall be resolved on a case-by-case basis through negotiations between the applicant and the company.

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

6. METERS

Gas delivered to customers from services attached to distribution lines shall be measured by meters to be furnished, installed and owned by the Company.

If, at any time after the installation of a meter, conditions are changed so that its location becomes unsuitable, the Company shall have the right to move the meter to a suitable place at the expense of the customer or property owner.

The cost of changes in location of meters made at the request of the property owner shall be borne by the owner. The customer shall not tamper with the meter and shall permit no one except employees of the Company to connect or disconnect the meter.

The customer shall be responsible to the Company for any injury to, or loss of, any meter arising out of or caused by the customer's negligence or carelessness, or that of his servants, employees, members of his household, or any person upon his premises under or by his consent, or sufferance. The customer shall at once notify the Company of any injury to, or any cessation in registration of, the meter as soon as it comes to his knowledge.

The Company, in its sole discretion, may install, together with its meter, an automated meter reading device ("AMD"), which can communicate automatically data from the meter to the Company by use of the telephone system. Customer shall provide the Company a suitable location for installation of an AMD, and the customer shall permit the Company to connect the AMD to the customer's existing telephone inside wiring. The customer shall not be required to install or modify telephone inside wiring or to subscribe to public utility telephone service in order to receive service from the Company.

The Company shall provide at lease 72 hours' notice of the installation of an AMD at the customer's premises. The Company will not install an AMD at a customer's premises unless the AMD is designed to relinquish control of the customer's telephone line when the customer's telephone equipment is activated. If an AMD installed by the Company fails to relinquish control of a customer's telephone line when the customer's telephone equipment is activated, then such AMD will be replaced or repaired by the Company at the Company's expense. The Company will not install any AMD capable of transmitting voice communications unless specific permission is obtained from the Commission prior to installation.

If a Customer of the Company is billed by a telephone public utility specific charges for usage of telephone service (toll charges or local message unit charges) or charges for maintenance services that were caused by the Company's installation or use of AMD's, then the Company will reimburse the Customer for such charges.

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

7. CUSTOMER'S PIPING AND EQUIPMENT

Prior to the installation of house piping by the customer in new or altered premises, inquiry shall be made of the Company to determine the requirements, sizes of pipe, quality and other specifications.

House lines, piping, connections and appliances are subject to inspection by the Company and no gas will be delivered unless all conditions are satisfactory.

The Company gives no warranty, expressed or implied, as to the adequacy or safety of any structure, equipment, piping, appliance or device owned, installed, leased or maintained by or for the customer or the owner of the premises served.

8. ACCESS TO PREMISES

The authorized agents of the Company shall, at all reasonable times, have free access to any premises supplied with gas or to which a service connection has been made, for the purpose of reading, inspecting, repairing or removing meters, piping, or other appliances therein belonging to the Company and of inspecting the piping and appliances belonging to the customer.

Every industrial customer shall permit the Company, during business hours and upon reasonable notice, to inspect the customer's facilities so that the Company may determine whether facilities have been installed which would enable the customer to obtain volumes of gas without using the Company's system ("Bypass Facilities"). If a customer refuses to permit the Company to inspect the customer's facilities, it shall be presumed that Bypass Facilities have been installed.

9. INTERRUPTION OF SERVICE

In accordance with the Public Utility Code, the Company will provide service which shall be reasonably continuous and without unreasonable interruptions or delay. The Company shall not be liable, in any amount, for damages, direct or consequential, where service meets requirements of the Public Utility Code. This limitation of liability, however, shall not apply to Company conduct which is found to be willful, wanton or reckless. If the Company shall know, in advance, of an expected interruption of service, the Company will take all reasonable steps, such as personal contact, phone contact or the use of mass media, to notify affected customers of the cause and expected duration of the interruption.

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

10. LEAKS

The responsibility for detecting leaks or defects in piping between the Company's service connection and the point of consumption shall be upon the customer. The customer shall give immediate notice to the Company of inadequate, irregular or failing gas supply, leakage, abnormally high or low pressures, or any dangerous conditions.

Should any leak or defect be discovered in the mains, service connections, customer's service line, piping, or appliances, the Company shall have the right to shut off the supply of gas until satisfactory repairs have been made.

11. REFUSAL OR TERMINATION OF SERVICE

The Company may decline to serve an applicant (1) until he has complied with state and municipal regulations governing gas service and the approved Rules and Regulations of the Company contained in this Tariff and any supplement thereto, (2) if the Company does not have adequate facilities to render the service desired or if rendering such service would affect unfavorably service to other customers, (3) if in the Company's judgment, the applicant's installation of piping or gas equipment is regarded as hazardous or of such character that satisfactory service cannot be given, (4) if an extension of street main is required beyond length warranted by anticipated revenues, and the customer refuses to pay the charges required by Rule 3 of this Tariff, (5) until all amounts due for regulated service or amounts purchased from a Natural Gas Supplier (NGS) through the Company's Purchase of Receivables Program (POR) pursuant to Rate Schedule SATC Section F ("Lesser Of" calculation) at a previous location have been paid or covered by a payment agreement (unless the amount owed is more than four years after the date of the final bill, in which case service cannot be refused), (6) or where the service proposed is from a gathering, production or transmission pipeline (see Rule 25). (C)

The Company may terminate service for nonpayment of a billing or billings for regulated services or NGS provided natural gas supply charges purchased through the Company's POR Program pursuant to Rate Schedule SATC Section F ("Lesser Of" calculation), and such termination of service shall be in accordance with general regulations of the Pennsylvania Public Utility Commission applicable thereto and in accordance with the Pennsylvania Public Utility Code. (C)

The Company may not threaten termination of service for nonpayment of unregulated Natural Gas Supplier charges incurred by the customer from qualified Suppliers under Rate Schedule SATS if the Company did not purchase the receivables from the Supplier. (C)

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

The Company may terminate service for such reasons and on such notice as specified by the regulations of the Pennsylvania Public Utility Commission, the Pennsylvania Public Utility Code, or for other violation of these Rules and Regulations.

The Company may refuse to serve any applicant, or may terminate service to any customer who fails to pay a security deposit for regulated services or who fails to provide the Company with security in lieu of a deposit as provided for in this Tariff.

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

12. RECONNECTION OF SERVICE

When the supply of gas to any customer is turned off due to the customer's failure to pay for regulated service or NGS provided natural gas supply charges purchased through the POR Program pursuant to Rate Schedule SATC Section F ("Lesser Of" calculation), for any other infraction of these Rules and Regulations or at the customer's request, and if there has been no change in ownership or occupancy of the premises served, the supply of gas will not be turned on until the customer or applicant has paid a reconnection fee of $69.00. The Company will reconnect a residential customer or applicant's gas service in accordance with the general regulations of the Pennsylvania Public Utility Commission applicable thereto and in accordance with the Pennsylvania Public Utility Code. Company may determine liability for outstanding balance for residential gas service based upon the methods set forth in 52 Pa. Code §56.191 and Company records. (C) (C)

If the supply of gas was turned off due to a non-residential customer's failure to pay for regulated service or NGS provided natural gas supply charges purchased through the POR Program pursuant to Rate Schedule SATC Section F ("Lesser Of" calculation) and if the former customer reapplies for service or if a court, district justice or administrative agency has determined that the applicant is legally obligated to pay for the service previously furnished, the supply of gas will not be turned on until the non-residential customer or applicant has paid all outstanding bills for service.

The reconnection of service cannot be denied for the nonpayment of Natural Gas Supplier charges billed to the customer for services rendered by Rate Schedule SATS Suppliers if the Company did not purchase the receivables from the Supplier.

13. DISCONTINUANCE NOTICE BY CUSTOMER

Any customer who is about to vacate any premise supplied with gas, or who for any reason wishes to have service discontinued, shall give at least seven days' notice to the utility specifying the date on which it is desired that service be discontinued. The customer who fails to give proper notice shall be liable for all gas which passes through the meter, until: the account is terminated; another party occupies the premises and agrees to assume responsibility for gas service; or, the customer notifies the Company or the Company learns that he has or will vacate the premises, in which case he shall be responsible for gas used for the period, not to exceed seven days, before the company is able to discontinue service.

14. GAS DELIVERED UNDER HIGH PRESSURE

The rates contained in this tariff are based upon gas delivered under conditions generally applicable to low pressure service (four ounce base). Bills for gas metered under high pressure will be computed upon the volume as indicated by the meter registration increased to the equivalent volume at standard pressure.

15. BILLING

Bills will be rendered and will be payable once each month. The Company may read any meter once each month but ordinarily it will read meters of domestic and commercial customers once each two months.

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

15. BILLING (Cont'd)

As to any customer whose meter is read once each two months, the consumption for the first month of each bimonthly meter reading period shall be determined by calculation on the basis of the customer's previous usage adjusted for weather conditions; and the consumption for the second month of each bimonthly meter period shall be determined by subtracting the first month's calculated consumption from the total actual consumption for the bimonthly period as shown by the meter. The bill for each month shall be the result of applying to the consumption, determined as aforesaid, the applicable rates and charges contained in this tariff.

Under 52 Pa Code § 56.222 the Company requested and was granted a waiver from 52 Pa. Code § 56.12(2) (i) - (ii) by the Commission. In accordance with this waiver, the Company will only accept customer supplied readings by telephone or through the Company's Internet website when such readings are: (1) reasonable based on historical usage information; and, (2) received by the Company within the proper billing window 3 business days prior to the bill being rendered. Acceptable customer readings will be used to compute a bill that otherwise would have been determined by calculation.

If the meter reader in any month is unable to gain access to the premises for the purpose of reading the meter, a calculated bill will be rendered and adjustments, if any, will be made by the Company when the meter is read.

In those instances where the Company's agent or representative is unable to gain access to the customer's premises during the regular scheduled working hours to obtain a meter reading, the number of calculated readings shall be limited to six consecutive months, and the customer's service, thereafter, is subject to termination, after due notice.

The late payment date specified on the monthly bill is not less than fifteen days from date the bill is mailed except that, for service under, or billed in conjunction with, residential rate schedules, the late payment date is not less than twenty days from the date the bill is mailed.

At the time the Company receives a notice to transfer service from one customer to another, the Company will provide customers with the option to either have the Company read the meter or to have the disconnecting and reconnecting customer read the meter. The Company will read the meter if the two customer readings are significantly different. The Company will inform the customers that if they elect the customer meter reading and the customer fails to provide the Company with an acceptable reading in a timely manner, the Company may estimate the final meter reading.

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

15. BILLING (Cont'd)

The Company will make reasonable efforts to obtain actual meter readings: (a) when the Company has insufficient data to estimate the Customer's usage; (b) when disconnect and reconnect orders are executed on different days; and (c) when the customer, at least seven days prior to the disconnect order date, specifically requests that the meter be read. The Company reserves the right to estimate a Customer's usage for a final bill whenever the Company is unable to gain access to its meter on the disconnect order date. The Company will accept meter readings from customers for final bills if the customer reading is provided in a timely manner and if, upon review, the Company finds the customer reading to be reasonable and consistent with prior usage levels. Notwithstanding the foregoing, the Company may not discontinue service unless in compliance with the Rules, Regulations or Orders of the Pennsylvania Public Utility Commission pertaining thereto and in effect at the time of such discontinuation.

16. PENALTY CHARGES

If the customer fails to pay his gas bill by the late payment date, a penalty will be charged. Payments received by mail will be considered paid on the date of the postmark.

Where a customer receives natural gas supply service from a qualified Supplier under Rate Schedule SATS but is not participating in the Company POR program, late payment charges will be applied to the Supplier charges only if the customer has agreed to pay Supplier late payment charges. Otherwise, late payment charges will be based on the distribution charges of the Company and natural gas supply charges of either the Company or Supplier. (C)

The penalty charged to all customers shall be 1.50% on the full unpaid and overdue balance.

17. BILLING PERIOD

Bills will be mailed monthly to residential customers for service furnished during the preceding meter-reading period at least twenty (20) days prior to the expiration of the late payment date as shown on the bill.

Bills will be mailed monthly to Commercial, Public Authority, Industrial and Large Industrial customers for service furnished during the preceding meter reading period at least fifteen (15) days prior to the expiration of the late payment date as shown on the bill.

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

18. BALANCED BILLING PLAN

The company has available a budget payment plan for Residential, Commercial, and Public Authority customers. The budget payment plan is available for all qualifying Company regulated services and for services provided to the customer by qualified Suppliers under Rate Schedule SATS where the Company provides billing service for the Supplier. At the request of any Residential, Commercial or Public Authority customer who uses gas as the primary source for space heating and who satisfies the company's credit standards, monthly payments for such customers may be made as follows:

Monthly payments shall be based on an amount equivalent to 1/12th of the customer's estimated annual bill rounded to the next higher dollar amount.

If a debit balance has accrued as of the 12th cycle month of this plan, the customer may either incorporate it all in the 12th cycle month's payment or at the company's discretion, spread all or part of the debit in equal monthly installments over the next cycle year. If the credit balance is accrued, the customer shall have the option of either receiving a cash refund, having it applied against the current bill, or having it used to reduce the monthly installments in the next cycle year. Absent an indication from the customer of his preference, the debit or credit will be applied to the first monthly installment in the ensuing year.

19. SEASONAL SERVICE

Service to Residential, Commercial, Public Authority, and Industrial premises occupied seasonally will be supplied at the rates and minimum charges of the applicable rate schedule.

20. SUPPLYING OF GAS SUPPLIES TO OTHER CUSTOMERS

No branch, valve or fixture which would permit gas to be withdrawn without registering on the meter shall be connected to a customer service line (i.e., the portion of the service line from the outlet of the Company's service stop cock to the inlet of the meter).

No extension of facilities, including the customer service line and facilities connected thereto and extending into a customer's premises, may be used to provide gas service at any additional or different premises. As used herein, a premises is defined as a single building; or the several buildings of a housing development under one ownership within a single parcel of land not intersected by a public highway or city street; or the several buildings of a religious, charitable, educational, or benevolent corporation if used exclusively for such purposes, if situated on adjoining properties even if intersected by a public highway or city street; or an industrial plant if situated on adjoining properties even though intersected by a public highway or a city street.

21. CONJUNCTIVE BILLING

The Company’s rates are based upon gas supply through a single delivery point, as measured by one meter. Separate supply for the same customer at other points of delivery or through more than one meter shall be billed separately. However, the Company may, when engineering or operational conditions warrant, or to improve service, install two or more meters on the (C)

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

21. CONJUNCTIVE BILLING(Cont'd)
same premises to service a single customer, in which event the consumption registered by such meters may be consolidated and the rates under which service is taken applied to the total consumption. The term "same premises" means a single building; or the several buildings under one ownership within a single parcel of land not intersected by a public highway or city street; provided, however, that the Company, in its sole discretion, may permit conjunctive billing at premises not conforming to the above definition of “same premises” if it is reasonably necessary to do so to meet competition from another supplier of energy, including gas.

An established conjunctive billing arrangement shall be permitted to continue so long as the customer remains at the premises presently served. The conjunctive billing arrangement shall neither be expanded to the customer's newly-acquired premises, nor transferred in whole or in part to different premises, nor continued at the same premises for different customers, unless, in the Company’s sole discretion, it is reasonable to expand, transfer or continue the conjunctive billing arrangement.

22. ADJUSTMENT OF BILLS FOR METER ERROR

Charges to customers will be adjusted for fast, slow and nonregistering meters, as per Section 59.22 of the regulations of the Pennsylvania Public Utility Commission for Gas Service, 52 Pa. Code Paragraph 59.22.

23. METER TEST ON REQUEST OF CUSTOMER

Meters which are not due for periodic tests will be tested for accuracy as per Section 59.21 of the regulations of the Pennsylvania Public Utility Commission for Gas Service, 52 Pa. Code Paragraph 59.21, upon written request by the customer and payment to the Company of a deposit in the amount specified by said regulations.

24. RULES FOR SECURING DEPOSITS

The Company may require applicants or customers to provide deposits for services if the criteria specified herein or otherwise imposed by applicable law are met. The Company may not deny the customer regulated services based on the customer’s failure to provide deposits for unregulated services. (C)

Deposits for Applicants/Customers Seeking or Receiving Residential Service

a) Deposits may be required from Residential customers in accordance with the Pennsylvania Public utility Code and the Rules and Regulations of the Pennsylvania Public Utility Commission.

b) Deposits for Residential service will equal 1/6 of the annual bill for the premise where Residential service is requested or used (inclusive of Natural Gas Supplier (NGS)charges where the NGS specified by the customer participates in the Company’s purchase of receivables program) as determined by the company.

c) c) The company may require deposits from a Residential applicant or customer for any of the following conditions:

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

24. RULES FOR SECURING DEPOSITS (Cont'd)

i. The applicant previously received service from the Company and had service terminated for any of the following: (C)

A. Nonpayment of an undisputed delinquent account.

B. Failure to complete payment of a deposit, provide a guarantee or establish credit.

C. Failure to permit access to meters, service connections or other property of the Company for the purpose of replacement, maintenance, repair or meter reading.

D. Unauthorized use of service delivered on or about the affected dwelling.

E. Failure to comply with the material terms of a payment arrangement.

F. Fraud or material misrepresentation of identity for the purpose of obtaining service.

G. Tampering with meters, including bypassing a meter or removal of an AMR device or other Company equipment.

H. Violating tariff provisions on file with the Commission so as to endanger the safety of a person or the integrity of the delivery system of the Company.

ii. A Residential applicant or customer who is unable to establish creditworthiness to the satisfaction of the Company using a generally accepted credit scoring methodology, and which employs standards for using the methodology that falls within the range of general industry practice.

iii. An existing Residential customer may be required to pay a security deposit to re-establish credit if the customer's service has been terminated and the customer requests reconnection, after the Company provides notice of its intention to require a security deposit in accordance with prevailing Commission regulations.

a) The Company will not require a cash deposit from an applicant or customer who, based on household income, is confirmed to be eligible for a customer assistance program. An applicant or customer is confirmed to be eligible for the Company's Commission-approved CAP as specified in the Company's Commission-approved Universal Service and Energy Conservation Plan if the applicant or customer provides income documents or other information attesting to his or her eligibility for state

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

24. RULES FOR SECURING DEPOSITS (Cont'd)

benefits based on household income eligibility requirements that are consistent with those of the Company's Commission-approved CAP as specified in the Company's Commission-approved Universal Service and Energy Conservation Plan. Upon determining that a customer or applicant is not subject to a deposit, the Company will return the deposit with any applicable interest to the customer or applicant within 60-days of the determination. (C)

a) The Company may accept, in lieu of a cash deposit, a written third-party guaranty. The guarantor will be responsible for all missed payments owed to the Company.

b) Payment of deposits will be required in full within 90 days. Residential customers or applicants may elect to pay the required deposit in three installments by paying 50% upon determination the deposit is required or prior to and as a condition of service, with 25% billed 30 days after service is established and 25% billed 60 days after service is established. Payment of installments will not be due less than 21 days from the date of mailing or service on the customer of notification of the amount due. Failure to pay an installment by the due date will result, after notice, in termination of service.

c) Until returned or credited, interest will accrue on Residential deposits at the rate of interest as determined by the Secretary of Revenue for interest on the underpayment of tax under Section 806 of the Act of April 19, 1929 (P.L.343, No. 176), known as The Fiscal Code. Interest accrued on Residential deposits, together with the deposit will (i) first be applied to any outstanding balance for service and, (ii) after satisfying any outstanding balance or if no outstanding balance exists, will be refunded to the customer at the time the deposit is returned.

d) Deposits for Residential customers will be held until the customer establishes a timely payment history which shall be defined as when the customer has paid in full and on time for a period of 12 consecutive months. At the end of the deposit hold period, the Company will credit the deposit plus accrued interest to the customer's account. The credit will be first applied to any past due amount. If service is terminated or discontinued before the end of the deposit hold period, any outstanding balance will be deducted from the deposit before the remaining deposit balance is returned to the customer within 60 days.

Deposits for Applicants/Customers Seeking Temporary Service.

Deposits may be required from customers taking service for a period of less than thirty days in an amount equal to the estimated bill for such temporary period.

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

24. RULES FOR SECURING DEPOSITS (Cont'd)

Deposits for Applicants/Customers Seeking Service Other than Residential Service (C)

Deposits may be required from Commercial or Industrial customers but shall not exceed the amount equal to the sum of amounts computed by applying the applicable sales rate schedule to the volumes of gas transported by or purchased from the Company, and consumed by the customer during the two, of the most recent twelve months of greatest usage by the Customer. In lieu of actual experience, the determination will be based on an estimate considering all

Security, in the form of a cash deposit, letter of credit, surety bond, or third-party guarantee, will be required from the applicants for Non-residential service unless: A) the premises to which gas service is to be supplied is a branch of, or additional facility operated by, financially responsible, enterprise which will be the ratepayer of record with respect to gas bills incurred at the premises; or, B) in the case of a premises not covered by "A" above, the Company determines, through relevant Company records covering past direct dealings with the applicant over a period of at least one year, that a deposit is not necessary. Security, in the form of a cash deposit, letter of credit, surety bond, or third-party guarantee, will be required from existing Non-residential customers where the Company determines that the customer's credit standing warrants concern as to its continuing ability to pay. In evaluating a customer's credit standing, the Company will take into account certain factors, including, but not limited to, the following: i) average monthly consumption; ii) average monthly bill; iii) payment history during the immediately preceding twelve month period; iv) customer's general credit standing as evaluated by any available applicable credit rating indices or rating services; v) customer's payment history and credit standing with other lenders or providers of utility and other services.

Interest will be paid on non-residential deposits at the rate of six percent (6%) per annum without deductions for any taxes thereon. Upon non-residential deposits held for more than a year, the Company shall pay to the patron, at the end of the calendar year, the interest accrued thereon.

25. CUSTOMERS SERVED THROUGH SERVICE CONNECTIONS ATTACHED TO FACILITIES OTHER THAN DISTRIBUTION SYSTEM LINES

Service from a line outside the Company's low pressure and medium pressure distribution systems will not be furnished unless such line is at that time being operated in a manner which will permit gas to be served to the applicant without interference with its operation. The furnishing of such service will be with the understanding that the use or manner of use of the Company's line from which gas is to be supplied is not permanent and that such service is subject to temporary or absolute change or discontinuance at the sole discretion of the Company which may at any time remove, repair or change the use or manner of operating said line after having first canceled the service contract by thirty days' written notice to the customer.

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES (Cont'd)

25. CUSTOMERS SERVED THROUGH SERVICE CONNECTIONS ATTACHED TO FACILITIES OTHER THAN DISTRIBUTION SYSTEM LINES (Cont'd)

The customer assumes sole responsibility, financially and otherwise for obtaining alternative sources of fuel in the event that customer's service is interrupted or discontinued permanently or temporarily, as described in the preceding paragraph.

The Company has the right to cancel the service contract for any such reason or in accordance with any other published rule or regulation of the Company, and, during the term of the contract, the Company shall not be liable for any deficiency in the supply of gas caused by the use of compressing stations, breakage of lines or other causes or for any claim for damages on account of any matters set forth in this paragraph.

All materials used in connecting the meter and regulators from the outlet of the Company's service stop cock to the outlet of the meter, and including the box or structure housing the meter and regulators, shall be furnished and installed by the Company at the expense of the customer. The meter and regulators shall belong to the Company and will be installed as near to the Company's lines as is practicable.

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

26. GAS EMERGENCY PLANS

A. Definitions

The following words and terms have the following meanings unless the text clearly indicates otherwise:

(1) Alternate fuel - Any fuel other than natural gas.

(2) Alternate fuel capability - The installed and operable ability to use any fuel other than natural gas on a time sensitive basis.

(3) Commercial use - Gas usage by customers engaged primarily in the sale of goods and services including consumption by office buildings, institutions and government agencies.

(4) Essential human needs - Gas usage in any building where persons normally dwell including residences, apartment houses, dormitories, hotels, hospitals and nursing homes.

(5) Firm service - Natural gas service offered to consumers under tariffs or contracts that anticipate no interruption.

(6) Industrial use - Gas usage by customers engaged primarily in a process which creates or changes raw or unfinished materials into another form or product including the generation of electric power.

(7) Interruptible service - Natural gas services that can be temporarily discontinued under term and conditions specified by tariff or contract.

(8) Plant protection use - Minimum usage of natural gas required to prevent physical harm to an industrial or commercial consumer's facility, or danger to personnel at the facility, when the protection cannot be afforded through the use of an alternate fuel. Plant protection use includes usage necessary for the protection of the material in process as would otherwise be destroyed, but does not include deliveries required to maintain production.

(9) Residential use - Gas usage in a residential dwelling or unit for space heating, air conditioning, cooking, water heating or other domestic purpose.

B. Natural Gas Emergency Planning

(1) The Company has filed a Natural Gas Emergency Plan ("Plan") with the Pennsylvania Public Utility Commission ("Commission") reflecting its unique operational characteristics and design criteria. The Plan contains simplified and understandable rules and regulations so that all of the Company's customers and all natural gas suppliers licensed to provide services to their customers can have a responsive action plan in place to protect themselves and their property in the event of a crisis. The Company's Natural Gas Emergency Plan can be located at the Company's website www.nationalfuelgas.com organized with other information for utility customers and natural gas suppliers. The Company shall file revisions to the Plan when and as appropriate, or as directed by the Commission. (C) (C)

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

26. GAS EMERGENCY PLANS (Cont'd)

(2) As part of the emergency planning process the Company shall attempt to make every reasonable effort to make contractual or informal arrangements with our transportation customers, sales customers and others to obtain supplies or, as an alternative, to implement usage reductions so that resorting to firm service reductions under Rule 26. C. Emergency Action can be avoided, or the severity of the supply or capacity disruption can be mitigated. The purpose of these arrangements is to provide a means to minimize the potential of supply shortfalls that threaten public health and safety, and not to make up for inadequate performance by individual parties.

(3) The Company's Natural Gas Emergency Plan includes provisions addressing:

(a) Emergency load shedding

(b) Voluntary usage reductions, for example, reducing space or water heating temperatures to levels specified by the Company.

(c) Mandatory usage reduction for certain customers consistent with Rule 26. C. Emergency Action.

(d) Issuance of periodic reports to the media concerning the existing natural gas emergency.

(e) Notice to affected customers and natural gas suppliers of the expected initiation of actions under Rule 26. C. Emergency Action.

(f) Customer and natural gas supplier delivery requirements that apply during the term of Rule 26. C. Emergency Action, regardless of customer specific usage reductions that arise or may arise from end-use curtailments.

(g) A procedure for focusing emergency measures to confined geographic or operational portions, segments or zones of the Company's system where a natural gas emergency exists.

(h) Procedures for establishing communications with electric system control area operators, if the Company provides gas service to electric generation stations.

(4) The Company's Natural Gas Emergency Plan specifies the procedures the Company shall use to provide notices to affected customers, their natural gas suppliers and natural gas distribution companies. After the Company determines the appropriate response, the Company shall issue notices to affected customers, their natural gas suppliers, and natural gas distribution companies as soon as reasonably possible.

C. Emergency Action

(1) An emergency exists whenever the aggregate demand of firm service customers on the Company's system or confined segment of the system exceeds or threatens to exceed the gas supply or capacity that is actually and lawfully available to the Company to meet the demands, and the actual or threatened excess creates an immediate threat to the Company's operating integrity with respect to Priority 1 customers as defined in Rule 26. A (4).

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

26. GAS EMERGENCY PLANS (Cont'd)

(2) If, in the sole judgment of the Company, there is sufficient time, the Company shall use reasonable business and operational efforts to: interrupt all interruptible services, issue operations flow orders, and call for voluntary usage reductions by all customers before taking action under subsection 3. The Company shall take these three actions sequentially to the extent feasible.

(3) In the event of an emergency as described in subsection 1, the Company may require each commercial and industrial retail and transportation customer that is not a Priority 1 customer under subsection 9 to reduce its consumption of gas.

(a) The reduction required shall be determined by the Company without regard to priorities of use, as necessary to minimize the potential threat to public health and safety.

(b) The minimum authorized usage may not be lower than the minimum usage of firm service for plant protection use.

(c) When all other service has been curtailed except for Priority 1 service and the Company continues to be unable to meet Priority 1 requirements, the Company shall utilize measures designed to minimize harm to customers if curtailments to plant protection use are found to be necessary.

(d) Consistent with the Company's responsibility to maintain system integrity at all times, the Company shall restore service as soon as practicable to any gas-fired electric generation facility that is deemed critical to electric system reliability by the electrical system's control area operator.

(4) Mandatory reduction under subsection 3 shall be for a period specified by the Company until further notice. The Company may change a customer's authorized usage, upon notice, at any time during an emergency.

(5) Mandatory reductions under subsection 3 shall be for a maximum duration of 5 business days unless extended by Commission order. As an alternative to extending mandatory reductions under subsection 3, the Commission may order the Company to initiate priority-based curtailments under subsection 6.

(6) In determining whether to order the Company to initiate priority-based curtailments, the Commission will examine whether the Company did the following:

(a) Interrupted all interruptible services.
(b) Issued operation flow orders.
(c) Called for voluntary usage reduction by all customers. (C)

(7) Upon issuance of a Commission order to initiate priority-based curtailments, the Company shall provide all affected customers the maximum notice possible, via telephone, text message, fax, electronic data interchange, or any other reasonable means of notification specifying the curtailment percentage of the customer's firm gas service and resulting allowances as may be the case. (C)

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

26. GAS EMERGENCY PLANS (Cont'd)

(8) Upon issuance of a Commission order to initiate priority-based curtailments, the available gas supplies to the Company shall be prorated, if practicable, among its customers according to the following priorities of use:

(a) Customers in a higher priority category shall not be curtailed until all customers falling into a lower priority category have been restricted to plant protection use levels, unless operational circumstances or physical limitations warrant a different result.

(b) Where only a partial restriction of a classification is required, implementation shall be prorata, to the extent practical under the circumstances as set forth in the Company's curtailment plan.

(9) Following are the priority categories, listed in descending order, pertaining to the curtailment of firm services:

(a) Priority 1. Service for essential human needs use.

(b) Priority 2. Firm services not included in essential human needs use.

(2.1) Plant protection gas

(2.2) All other consumption not contained in (2.1) above and Priority 1. Service for essential human needs use (excluding plant protection gas).

(2.3) Intermediate Volume Industrial Service (IVIS) / Commercial / Public Authority consuming > 12,000 Mcf per year (excluding plant protection gas).

(2.4) Large Volume Industrial Service (LVIS), all industrial accounts consuming greater than 50,000 Mcf per year (excluding plant protection gas).

(2.5) Large Industrial Service (LIS), all industrial accounts consuming greater than 200,000 Mcf per year (excluding plant protection gas).

D. Utility Liability

(1) The company may restrict or discontinue service in accordance with this section without hereby incurring any penalty or liability for any loss, injury or expense that may be sustained by the customer except when the restriction or discontinuation of service is a result of the Company's willful or wanton misconduct.

(2) Company liability for actions taken under Rule 26. C. Emergency Action, or to a regulation, policy statement, directive or order issued by the Commission or an emergency order issued by the Governor shall be governed by the following principles:

(a) If the Company appropriates natural gas during an emergency action, the Company shall compensate the applicable entity, whether the customer or the

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

26. GAS EMERGENCY PLANS (Cont'd)

customer's natural gas supplier, for the cost of the lost, firm gas service. The compensation, in the aggregate, shall equal but not exceed the greater of:

(i.) The city gate cost of the appropriated natural gas, including transportation charges up to the Company's city gate, or

(ii.) The reasonable cost actually paid by the customer for delivered substitute energy, as documented to the Company. The Company may provide compensation in kind only at the discretion of the affected customer or natural gas supplier.

(b) The Company may discontinue service, for the duration of an emergency, to a customer that continues to take gas in violation of the rules found in Rule 26. Gas Emergency Plans.

E. Penalties for Unauthorized Takes

If a customer exceeds its authorized consumption during a natural gas emergency, then the customer will pay a penalty, in addition to any and all other penalties or charges incurred during such emergencies, according to the following schedule:

Actual usage as a percentage of Emergency Authorized Consumption	Penalty
Greater than 103% but not in Excess of 110%	The higher of $10/MCF or 110% of the highest gas supply purchased by the Company during the month of usage.
Greater than 110%	The higher of $25/MCF or 125% of the highest gas supply purchased by the Company during the month of usage.

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

27. FINANCIAL FITNESS REQUIREMENTS FOR NATURAL GAS SUPPLIERS (C)

Dun & Bradstreet reports will be utilized as the primary source of credit information to determine the creditworthiness of Natural Gas Supplier applicants for service. The following Dun & Bradstreet standards will be used: a credit risk rating of 1 through 5 and "uncoded", noted on the report (the continuum range is 1 to uncoded). The values for these rating are: (C)

"1" assets, liabilities and payment history indicate little or no risk to creditors.

"2" assets, liabilities and payment history indicate some risk to creditors.

"3" assets, liabilities and payment history indicate a moderate risk to creditors.

"4" assets, liabilities and payment history indicate a greater than moderate risk to creditors.

"5" assets, liabilities and payment history indicate a severe risk to creditors.

"Uncoded" indicates that there is insufficient historical credit data available to make a reliable credit assessment of the applicant (such as the applicant being in business less than 14 months, change of ownership, etc.)

Upon receipt of the properly completed Credit Application, the company will obtain various Dun & Bradstreet reports for initial review and assessment. The reports will include, but not be limited to: Payment Analysis Report, Business Information Report, Comprehensive Report and Credit Score

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

Report. In addition, other criteria will be taken into consideration in assessing the Company's potential risk exposure, such as: (1) established payment history of the applicant with the Company and (2) the ratio of anticipated projected enduser volumes to the supplier's unencumbered assets available for payment; and (3) historical reliability of deliveries (nominations vs. deliveries). (C)

"1" Rating: (C)

In general, if the reports indicate an overall rating of "1" no security deposit will be required at the time, subject to changes listed below. However, if anticipated projected enduser volumes indicate a substantial risk exposure over and above indicated current assets available for payment, a security deposit may be required.

"2" Rating: (C)

If the reports indicate an overall rating of "2" additional background investigations will be completed. These investigations will include but not be limited to: (1) an assessment of the applicant's payment history with the Company, (2) compilation of other creditors and trade creditor's reports, (3) request for financial statements, if necessary. Upon completion of a review of the additional information a determination will be made regarding the Company's risk exposure and a recommendation made to waive or request a security deposit.

"3-5" Rating: (C)

If the reports indicate an overall rating of "3-5" a security deposit will be required. No further investigations will be made unless extenuating circumstances exist and the applicant brings those situations to the attention of the reviewer.

"Uncoded": (C)

Any applicant with a rating of "uncoded" will automatically be designated as having a rating of "3-5" and be required to post a security deposit.

Changes affecting credit risk ratings:

All approved Suppliers and Aggregators will be periodically reviewed to determine if: (1) there is a change in their credit risk rating; (2) security needs to be required on a previously unsecured account; (3) the amount of security being held should be increased or decreased to meet projected future usage, based upon historical usage data.

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

Changes indicating that a credit review may be necessary include, but are not limited to: (1) significant changes in Dun & Bradstreet credit reports; (2) credit related information obtained from reliable sources; (3) a change in the number of end-users; (4) a change from the established payment history; as well as any other information received regarding the financial standing of the Supplier or Aggregator. Security deposits will be refunded to the Supplier or Aggregator when it is determined that the Supplier or Aggregator meets the level of creditworthiness criteria that no longer requires a security deposit.

Determination of Security Deposits:

The amount of a security deposit will be determined under the following formula:

(1) For Natural Gas Suppliers during the winter period (C)

a. Using historical data, for (1) transportation service shall be the sum of the two highest months of consumption in the last twelve months. This volume will be multiplied by 60 and divided by the actual amount of billing days, and (2) the commodity volumes shall be determined by taking the highest consumption between November 1 through March 31. This volume will be multiplied by 10 and divided by the actual number of billing days. The consumption for each customer anticipated to be served by the applicant Natural Gas Supplier will be multiplied by (3) the (C) applicable transportation rate; and (4) the corresponding cost of gas.

b. The "corresponding cost of gas" shall be the Natural Gas Supply Charge.

Monthly reviews will be provided, based upon any changes which may affect the Company's risk exposure.

Other credit criteria for Natural Gas Suppliers is located in Rate (C) Schedules Monthly Metered Natural Gas Supplier Service and Small Aggregation Transportation Supplier Service Section I. Supplier Qualification Criteria.

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

(2) For Natural Gas Suppliers during the summer period (C)

a. Using historical data, for (1) transportation service shall be the sum of the two highest months of consumption in the last twelve months. This volume will be multiplied by 60 and divided by the actual amount of billing days, and (2) the commodity volumes shall be determined by taking the highest consumption between April 1 through October 31. This volume will be multiplied by 10 and divided by the actual number of billing days. The consumption for each customer anticipated to be served by the applicant Natural Gas Supplier will be multiplied by (3) the (C) applicable transportation rate; and (4) the corresponding cost of gas.

b. The "corresponding cost of gas" shall be the Natural Gas Supply Charge.

Monthly reviews will be provided, based upon any changes which may affect the Company's risk exposure.

Other credit criteria for Natural Gas Suppliers is located in Rate (C) Schedules Monthly Metered Natural Gas Supplier Service and Small Aggregation Transportation Supplier Service Section I. Supplier Qualification Criteria.

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

Payment of Security:

Payment of security deposits can be made by cash or acceptable form of security such as Letter of Credit. Interest will be paid on cash security deposits at the same rate paid on deposits for service to non-residential customers. Responsibility for and expenses incurred in the procurement of a Letter of Credit are subject to requirements and/or negotiations with the Applicant’s individual bank. In addition, the Company may in its sole discretion accept an agreement setting special operating standards (“Operational Default Agreement”) and/or an Escrow Account Agreement in exchange for reducing the level of security otherwise required. (C)

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

28. RULES FOR TRANSPORTATION SERVICE

The following terms and conditions shall apply to Transportation Service. (C)
Additional operating procedures, protocols and business practices for (C)
transportation service can be found in the Company's Operational Procedures Manual which is posted on the Company's web site.

A. GAS QUALITY

(a) All gas delivered by Customer into Company's facilities will:

(1) Have a total heat content of not less than nine hundred sixty seven British Thermal Units (967 BTU) per cubic foot and not more than one thousand on hundred British Thermal Units (1,100 BTU) per cubic foot, provided however, that Company shall have the option (but never the obligation) to accept Customers gas having a heat content outside of this range, when in Company's sole judgment, such different heat content does not prevent Customer's gas from being merchantable and fit for use by Company in its intended markets;

(2) Be commercially free from dust, hydrocarbon liquids, water, objectionable odors, or other gaseous, solid or liquid matter which might become separated from the gas in Company's facilities or interfere with the proper operation of the pipelines, regulators, meters or other equipment through which it flows; and Customer shall furnish, install, operate, maintain and keep in efficient operating condition, at Customer's own expense, such drips, separators, dehydrators, alcohol bottles, gas cleaners and any other devices or equipment as may be or become necessary to effect compliance with this requirement;

(3) Not contain more than twenty (20) grains of total sulfur (S), nor more than three-tenths (0.3) grain of hydrogen sulfide (H_2S) per one hundred (100) cubic feet;

(4) Not contain more than two-tenths of one percent (0.2 of 1%) by volume of oxygen (0_2), and Customer shall make every reasonable effort to keep the gas free of oxygen (0_2); (C)

(5) Not contain more than five percent (5%) by volume of a combined total of carbon dioxide ($C0_2$) and nitrogen (N_2) components; provided, however, that the total carbon dioxide ($C0_2$) content shall not exceed two percent (2%) by volume;

(6) Have a temperature of not more than one hundred twenty (120) degrees Fahrenheit; and

(7) Have been dehydrated by Customer for removal of water in a vapor state, and in no event contain more than seven (7) pounds of water vapor (H_20) per million cubic feet, except as permissible according to the NFG Water Vapor Content Chart contained in the Company's Operational Procedures Manual, as determined by Company. In no event shall Customer deliver to Company free or entrained water (H_20). (C)

C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

(b) In the event any of the above substances enter any of Company's facilities in quantities greater than the levels, if any, permitted above, with or without Company's knowledge, and/or cause, directly or indirectly, damage to any such facility, Company may, at Customer's expense, clean up and/or repair such facility. Further, in the event any of the above substances enter any facilities owned by retail customers of Company in quantities greater than the levels, if any, permitted above, with or without Company's knowledge, and/or cause, directly or indirectly, damage thereto, Customer shall indemnify Company against, hold it harmless from, and undertake the defense of Company with respect to any and all claims, losses, damages (including punitive damages, to the extent permitted by law), and injuries (property damage and personal injury, including death) arising therefrom and shall indemnify Company for any expenses, including attorney's fees and clean-up costs, incurred in partial or full satisfaction of any such claims, losses, damages and injuries.

(c) As to Customer's gas which does not meet the specifications stated herein, Company shall have the rights, on a continuing basis, and in addition to any other remedies provided herein, to:

(1) Continue to receive such gas; or

(2) Discontinue the flow of such gas, and, in the event Customer will not correct such deficiency within a time period acceptable to Company, to terminate the Service Agreement as to such gas; or

(3) Receive such gas and, at Customer's expense, treat or otherwise process the same so as to cause it to conform to the above quality specifications.

If the gas delivered fails to meet the 1,000 BTU standard specified in Paragraph (a)(1) above, Company shall also have the option to retain sufficient additional volumes of gas to compensate for such deficiency.

B. MEASUREMENT

(a) For all gas delivered by Customer to Company, the volumetric measurement base shall be one (1) cubic foot of gas at a pressure base of fourteen and seventy-three hundredths (14.73) pounds per square inch absolute and a temperature base of sixty (60) degrees Fahrenheit. The average absolute atmospheric (barometric) pressure shall be fourteen and four tenths (14.4) pounds per square inch. The flowing temperature shall be sixty (60) degrees Fahrenheit and may be adjusted to actual flowing conditions by Company if deemed necessary by Company. All said gas shall be measured by orifice or displacement type meter or any other approved measuring device of equal accuracy. Orifice meters shall be installed and operated, and gas volumes computed in accordance with Report No. 3 of the Gas Measurement Committee of the American Gas Association, including any revisions applying thereto.

(C) Indicates Change

(C)

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

(b) Customer shall install, or cause to be installed, at no expense to Company, measuring equipment necessary in Company's judgment to accomplish accurate measurement of the gas. Company shall operate and maintain said measuring equipment. The measuring equipment will be installed, operated and maintained in accordance with the specifications of the Gas Measurement Committee of the Natural Gas Department of the American Gas Association, as amended from time to time, or by any other mutually acceptable method commonly used in the industry. Such measuring equipment shall conform to the specifications provided by Company; shall be calibrated, as Company deems necessary, by Company; shall be inspected by Company; and must be approved by Company prior to any deliveries hereunder.

Customer recognizes that it may be necessary for Company's employees, agents, or representatives, to enter the property on which said measuring equipment is located to perform such functions upon said measuring equipment as may be necessary to effectuate the provisions of a Service Agreement, and Customer hereby expressly grants Company permission to perform such functions on said measuring equipment. Customer, to the extent it is within Customer's power to do so, will grant Company such easements as may be necessary for Company's employees to enter the property on which said measuring equipment is located. In the event that easements from other parties are necessary for Company's employees, agents or representatives to enter the property on which said measuring equipment is located, Customer will acquire such easements, and agrees that the Service Agreement will not become effective until and unless such easements are acquired.

(c) Company will read the meter(s) measuring the consumption at Customer's facility at the conclusion of each billing month. Upon the request of Company, the Customer shall read such meter(s) at reasonable intervals and provide such readings to Company. Measurement shall be governed by any applicable provisions of Company's tariff, and any applicable regulations of the Pennsylvania Public Utility Commission. The pressure base shall be fourteen and sixty-five hundredths (14.65) pounds per square inch absolute. No volumetric adjustments shall be made to compensate for the difference between this pressure base and the pressure base identified in Paragraph (a) above.

(d) Each party shall have constant access to the meters and access, upon reasonable notice and during business hours, to meter charts and records.

(e) Measurement of production gas at receipt meters shall be calculated following the recommendations of the ANSI/API 2530 ''Orifice Metering of Natural Gas and Other Related Hydrocarbon Fluids'' (A.G.A. Report No. 3) including the A.G.A. Manual for Determination of Supercompressibility Factors of Natural Gas or the A.G.A. Transmission Measurement Committee Report No. 8 ''Compressibility and Supercompressibility for Natural Gas and Other Hydrocarbon Gases'' or the ANSI B109.3 ''Standard for Rotary Meters'' and ''Measurement by Turbine Meters - Volumetric Flow Measurement'' (A.G.A. Report No. 7), as appropriate to the type of measurement installed at the receipt facility, including any revisions applying thereto. If the receipt facility gas flow characteristics are such that calculations cannot be performed consistent with the above-mentioned recommendations due to a decline in production or other operational matters, the Company shall have the right to turn off a meter until a replacement meter meeting the above specifications is installed. (C)

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

(f) Prior to September 30, 2013 a producer or operator of a receipt facility with gas flow characteristics such that calculations cannot be performed consistent with paragraph (e) above may request that the Company retrofit such facility with acceptable metering equipment. The Company shall not bear any facilities or installation cost, other than purchase of replacement metering, necessary to address the conditions that resulted in the meter turn off. Such request shall be made within 60 days of notification from the Company that it will be exercising its right to turn off the meter and does not restrain the Company's right to turn off a meter until a replacement meter meeting the above specifications in paragraph (e) above is installed. (C)

C. WARRANTY OF TITLE

Customer warrants the title to all gas delivered to Company from Customer or on behalf of Customer and shall indemnify and save harmless Company from all suits, actions, accounts, costs, losses and expenses (including attorney's fees) arising from or connected with the adverse claim of any person or persons to the gas received, transported or delivered. Customer assumes all responsibility for all royalties, licenses, taxes and charges to which the gas transported, or the transportation service, may be subject.

D. LIABILITY

(a) It is expressly agreed and understood that until gas is delivered to Company for transportation, Customer shall be deemed to be in exclusive possession and control thereof and shall be solely liable and responsible for, and shall indemnify, protect, save harmless and undertake the defense of Company, of and from all losses, claims (whether groundless or not), damages, injuries (including death), suits, actions, debts, accounts, liens, liabilities, costs and expenses including without limitation, legal fees and costs, which Company may sustain, incur, pay or lay out by reason of, arising from or occasioned by such possession and control.

(b) Customer acknowledges that Company has made no guarantees regarding the volumes of gas it will be able to receive from Customer or on behalf of Customer at the specified receipt points, and Company shall not be liable to Customer should actual receipts prove to be less than the levels expected by Customer, its supplier, or Company.

(C) Indicates Change

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

E. MISCELLANEOUS PROVISIONS

(a) Customer or a party appointed by the customer to act on Customer's behalf shall provide Company with nominations setting forth, by source, the volume to be transported by Company following procedures set forth in the Company's Operational Procedures Manual.

(b) The Customer appoints the party(ies) identified in the NFGDC Customer Agency Agreement form as its agent(s) for purposes of making such nominations and determining the proper allocation of volumes among all affected customers. All allocation methods are subject to the prior approval of Company.

(c) Deliveries of gas by or on behalf of Customer to Company at point(s) of receipt hereunder shall be made against the line pressure existing in Company's pipeline from time to time at a maximum pressure designated by Company from time to time. Company shall not be obligated to decrease such line pressure, and Customer shall not compress the gas delivered to Company without the prior approval of Company, which shall not be unreasonably withheld.

(d) Company will retain a percentage of the total volumes received by Company for the account of Customer as a loss allowance.

29. MARKET PRICE OF NATURAL GAS

For use within rate schedules in this Tariff, the Monthly Market Index ("MMI") shall be equal to the MCF equivalent of the highest volume weighted average price during the month, at Tennessee Gas Pipeline's Zone 4 200 Line Trading Hub, referred in the SNL Natural Gas Index ("SNL") as "TGP Z 4 200L" which will serve as the Company's Market Index Point. The Daily Market Index ("DMI") shall be equal to the MCF equivalent of the volume weighted average price for the applicable date, at the Market Index Point.

Where transportation costs reflecting the cost of delivering gas to the Company's city gate are added to the MMI or the DMI to determine the market price of natural gas as applied by the Company under tariff rate schedules, such costs, unless explicitly stated otherwise, reflect the variable costs of using the associated pipeline capacity, e.g. commodity transportation rates, fuel retention and other variable usage surcharges, as applicable. (C)

Should a price for the Market Index Point be temporarily unavailable during any period, the Company may, at its discretion, select a substitute representative price in the interim. If the Market Index Point price becomes unavailable on a permanent basis, the Company will file to change this section and may, at its discretion, select a substitute representative price in the interim, subject to refund.

30. RULES FOR MONTH END IMBALANCE RESOLUTION

The Imbalance Holder is the Customer or Supplier responsible for imbalance resolution as described in Rate Schedules MMNGS or SATS, under which the Company provides service. For the purposes herein, Imbalance Holder's gas consumption and deliveries to the Company are equivalent to the gas consumption and deliveries to the Company of the MMT or SATC Customers, respectively, for which it bears imbalance responsibility.

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

An Imbalance Holder's Month End Imbalance is the burner tip imbalance for which the Imbalance Holder bears imbalance responsibility, pursuant to terms of Rate Schedules MMNGS or SATS. Generally, an Imbalance Holder's total receipt volumes (gas delivered to the Company) are the sum of allocated transportation receipt volumes from city gate deliveries, local production pool receipts and local production excess volumes. This sum is reduced for shrinkage (allowance for losses incurred in the process of delivery) to determine total receipts. From this quantity, Total Monthly Consumption ("TMC"), as measured or estimated, is subtracted to determine the imbalance volume.

A Deficiency Imbalance (imbalance owed to the Company) occurs when the volume of gas delivered to the Company for the Imbalance Holder during the month after adjustment for line losses is less than the total amount of gas consumed by the Imbalance Holder.

a. Month End Imbalance Calculation Process

For the month during which the Company provided service, an Imbalance Holder's imbalances are summed across all eligible Service Classifications to determine an Initial System Imbalance Volume ("ISIV") and position. If the ISIV is greater than zero, then the Imbalance Holder has a Surplus Imbalance with an initial long position. If the ISIV is less than zero, then the Imbalance Holder has a Deficiency Imbalance with an initial short position. A measure of the Imbalance Holder's imbalance position is calculated by dividing its ISIV by its TMC and converting the quotient into a percentage.

b. Cash Out of Imbalances (C)

To resolve a Surplus Imbalance, the Company will purchase a volume of gas from the Imbalance Holder to reduce the imbalance volume to zero ("Cash Out Purchase"). To resolve a Deficiency Imbalance, the Company will sell a volume of gas to the Imbalance Holder to reduce the imbalance volume to zero ("Cash Out Sale"). The actual cash out volumes will be based upon ending imbalance volume following application of prior period adjustments and exchange of imbalances as described below.

The rate for cash out will be the Average Daily Market Index ("ADMI"), which is the average of each day's DMI, plus transportation costs reflecting the cost of delivering gas to the Company's city gate, during the month set forth in Rule 29. The cash out pricing tiers and applicable rates are as follows:

Tier	Transaction	Imbalance Position	Rate
Surplus Pricing Tier 3	Purchase	>20 % long	60 % of ADMI
Surplus Pricing Tier 2	Purchase	15% to 20 % long	85 % of ADMI
Surplus Pricing Tier 1	Purchase	5% to 15 % long	90 % of ADMI
Market Pricing Tier	Purchase or Sale	5 % long to 5% short	100% of ADMI
Deficiency Pricing Tier 1	Sale	5% to 15% short	110% of ADMI
Deficiency Pricing Tier 2	Sale	15% to 20% short	115% of ADMI
Deficiency Pricing Tier 3	Sale	>20% short	140% of ADMI

The Company will sum the ISIV and TMC for all Imbalance Holders into system totals. A System Imbalance Position ("SIP") will be computed by dividing the system total ISIV by the system total TMC and converting the quotient into a percentage. If the SIP is within the range 5% long to 5% short, then all Imbalance Holders will be assigned to the Market Pricing Tier.

(C) Indicates Change

Voluntarily Suspended to April 13, 2012

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

Based upon its initial system imbalance position, the Imbalance Holder will be assigned to an initial pricing tier. Before the start of imbalance trading, an Imbalance Holder's Pre-Trading System Imbalance Volume ("PSIV") will be calculated by applying prior period adjustments, if any, to its ISIV. The Imbalance Holder's pre-trading imbalance position is calculated by dividing its PSIV by its TMC and converting the quotient into a percentage. If the resulting imbalance percentage moves closer to zero, the Imbalance Holder will be assigned to a pre-trading pricing tier based upon the adjusted percentage. If the resulting imbalance percentage moves further from zero, the Imbalance Holder will be assigned to a pre-trading pricing tier equal to the initial pricing tier. If the direction of imbalance reverses (Surplus Imbalance to Deficiency Imbalance or Deficiency Imbalance to Surplus Imbalance), the pre-trading pricing tier assigned to the Imbalance Holder will be the Market Pricing Tier.

c. Exchange of Month End Imbalances

The Company will provide Imbalance Holders with the means to exchange Month End Imbalances. Trading sessions will be scheduled to begin on the 10th business day following the end of the month (approximately on the 15th of the month). Morning and afternoon trading sessions will be conducted over a three business day period. Notice of any delay or alteration of the trading schedule will be posted on the Company's web site. Upon request of the Imbalance Holder, the Company will provide other Imbalance Holders with information regarding the Imbalance Holder's imbalance status for the month. (C)

Each trade must improve an Imbalance Holder's imbalance position, i.e. the resulting imbalance volume must be closer to zero. In no event will the Company process trades that worsen an Imbalance Holder's imbalance volume. The Imbalance Holder's post-trading or Final System Imbalance Volume ("FSIV") will be calculated by adding the volumes from its trades to the PSIV.

d. Post-Trading Resolution and Application of Cash Out Tiers

An Imbalance Holder's post-trading imbalance position is calculated by dividing its FSIV by its TMC and converting the quotient into a percentage. The Imbalance Holder's post-trading imbalance position will be used to determine the post-trading imbalance tier for cash out, however, the post-trading imbalance tier will not be worse than the pre-trading imbalance tier.

If the volumetric range of the Imbalance Holder's Market Pricing Tier for a month is significantly smaller or otherwise inconsistent with that occurring during the normal course of business, the Company may override the post-trading imbalance tier calculation for that month and assign the Imbalance Holder to the Market Pricing Tier. Examples of such circumstances are:

- During the initial month in which an Imbalance Holder has an imbalance resulting from service under an eligible Service Classification as described above.
- During the final month in which an Imbalance Holder has an imbalance resulting from service under an eligible Service Classification as described above.

For customer pools where the Company assigns an ADDQ, if the Imbalance Holder's total receipt volumes are within 2% of the total monthly ADDQ for each pool, the Imbalance Holder will be assigned to the Market Pricing Tier. For MMT pools where the Company does not assign an ADDQ, the TMC for each pool will be substituted

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

for the ADDQ. Additionally, if an Imbalance Holder's FSIV is less than 1,000 Mcf, it will be assigned to the Market Pricing Tier. If the Imbalance Holder does not qualify for the Market Pricing Tier under either of these safe harbors, then the Imbalance Holder's FSIV will be used to determine imbalance pricing.

The Imbalance Holder will be cashed out at the tiers, beginning at the tiers furthest from the Market Pricing Tier until the imbalance volumes within all the tiers are reduced to zero. The Market Pricing Tier will be cashed out after all other tiers have been cashed out.

Cash Out Sales and Cash Out Purchases will be reflected on the next bill issued by the Company to the Imbalance Holder following the conclusion of trading sessions.

31. CHANGES OF RULES AND REGULATIONS

The Company reserves the right to modify, alter or amend the foregoing Rules and Regulations and to make such further and other rules and regulations as experience may suggest or the Company may deem necessary or convenient in the conduct of its business provided, however, that such modifications, alterations, or amendments shall not become effective unless and until included in this tariff.

32. RENEWABLE NATURAL GAS

Renewable Natural Gas or RNG is Pipeline compatible gaseous fuel derived from biogenic or other renewable sources that has lower lifecycle CO2e emissions than geological natural gas. Examples include pipeline compatible gas derived from wastewater treatment plants, landfill gas, anaerobic digestion gas, power to gas from renewable electricity or syngas.

The operating procedures applicable to RNG are provided in the Company's Operational Procedures Manual. Parties wishing to produce RNG for delivery into Distribution's system, i.e. RNG Operators, are required to execute an RNG Interconnect Agreement as a condition of access.

RNG produced and delivered into the Company's system must meet the Company's RNG Quality Standards, as specified in the RNG Interconnect Agreement, as well as the gas quality standards specified in Rule 28 of this tariff.

33. DATA SECURITY AGREEMENT

As a condition of access to customer information via publicly available Company business systems, including but not limited to web portals, the Company will require marketers, suppliers, and agents requesting such access to sign a Data Security Agreement and require that the parties carry and maintain Cybersecurity insurance in an amount no less than $2,000,000 per incident. A standard form Data Security Agreement will be provided in the Company's Operational Procedures Manual. (C)

Such requirement shall not apply to customers with usage less than 5,000 mcf per year that seek to access their own customer account information. Further, the Company may accept Cybersecurity insurance provided under another agreement, provided that such agreement is substantially identical in form and effect as the standard form Data Security Agreement.

(C) Indicates Change

RESIDENTIAL SERVICE RATE SCHEDULE

RESIDENTIAL CLASSIFICATION

This classification shall include gas supplied for residential purposes such as a private dwelling, apartment house with a single meter supplying four or less dwelling units, separately metered apartments of a multiple dwelling, accessory buildings to dwellings or apartment houses such as garages, except at residences receiving service under Rate Schedule LIRAS for Low Income Residential Assistance Service and other places of residence where gas is used for residential purposes.

Churches and missions (places of worship) shall be entitled to Service under the Residential service rate schedule.

AVAILABILITY OF SERVICE

Gas Service shall be available at one location, except as otherwise provided, for residential customers.

APPLICABILITY

Applicable in all areas served under this tariff.

MONTHLY RATE

Basic Service Charge

$14.00	per Month	

Distribution Charges

34.064¢	per 100 cubic feet		(D)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.037¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(D)
2.073¢	Per 100 cubic feet	Total Gas Adjustment Charge	(D)

(D) Indicates Decrease (I) Indicates Increase

RESIDENTIAL SERVICE RATE SCHEDULE (cont.)

Natural Gas Supply Charge			
50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.907¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(D)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
52.390¢	per 100 cubic feet	Total Natural Gas Supply Charge	(D)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 1.8032% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223. The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge. Residential rate classes shall be subject to Rider F - CAP Discount Charge as set forth in this tariff.

RULES AND REGULATIONS

The rules and regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

(D) Indicates Decrease (I) Indicates Increase

RATE SCHEDULE CAP
FOR CUSTOMER ASSISTANCE PROGRAM SERVICE ("CAP") (C)

AVAILABILITY OF SERVICE

Service under this rate schedule shall be available on/after the effective date of this Tariff Supplement (the "CAP Implementation Date") to those meeting all of the following requirements: (C)

1. Must comply with the terms of CAP as specified in the Company's then-current Universal Service and Energy Conservation Plan ("Plan"). Must be residential heating customers of the Company;
2. Must have a gross household income equal to or less than 150% of the Federal Poverty Income Guidelines (FPIG);
3. All adult individuals residing in the household must agree to: (i) participate in CAP and provide their names and social security numbers or other acceptable forms of identification; and (ii) provide satisfactory verification to prove income, as specified hereinbelow under the heading "Responsibility of a CAP Customer"; and
4. Must agree to receive LIURP services if they meet the eligibility requirements.

RESPONSIBILITY OF A CAP CUSTOMER (C)

1. All household income must be verified at time of enrollment. Additionally, once enrolled, CAP participants must agree to have their income verified periodically (at intervals as specified in the Company's Plan) and advise the Company if their income or household size changes. For those reporting "zero" or "no" income, reverification may be made using the Commission's Standard CAP Reverification Form.
2. Payment of the "CAP Balance Due Amount" (defined in this Rate Schedule) are required to avoid termination of service.
3. No extensions or arrangements (to avoid termination of service) will be offered to CAP customers.
4. Must comply with the terms of CAP as specified in the Company's Plan.
5. The ratepayer must agree to apply annually for LIHEAP, if eligible and LIHEAP is available.

APPLICATION PROCESS

Prospective CAP customers must complete the application as specified in the Plan. Enrollment in CAP will occur upon the Company's review and verification that the individual(s) who have made application to participate in CAP meet the requirements specified herein and in the Plan. (C)

(C)

SPECIAL TRANSITION PROVISION – Consistent with the Company's Plan (approved by Order of the Commission on December 22, 2022 at Docket No. M-2021-3024935), all customers who were enrolled in National Fuel's former customer assistance program, known as the "Low-Income Residential Assistance" Program ("LIRA") on the date immediately prior to the CAP Implementation Date will automatically be enrolled in CAP (the "Carryover Customers").

(C) Indicates Change

MONTHLY RATE

For each monthly bill, the Company will determine the following for each customer receiving service under this rate schedule: (C)

(1) **PIP Amount:** Determined as follows:

Income Category	**PIP Amount (Amount of Monthly Gross Household Income**)**
0-50% FPL*	**4%**
51-150% FPL*	**6%**
*As used in the above table, "FPL" shall refer to the Federal Poverty Income Guidelines published annually in the *Federal Register* by the United States Department of Health and Human Services. **As used in the above table, "Monthly Gross Household Income" shall have the meaning ascribed to the term "Household income" in Section 1403 of the Public Utility Code (66 Pa.C.S. § 1403).	

(2) **Average Monthly Bill Amount:** Calculated as per the "Balanced Billing Plan" specified in Rule 18 of this Tariff.

Customers receiving service under this rate schedule will be required to pay the greater of (a) or (b) below as determined on monthly basis (the "**CAP Balance Due Amount**"):

(a) PIP Amount or Average Monthly Bill Amount (whichever results in a lesser amount for the Customer); or

(b) CAP Minimum Payment Amount of $12.00.

(C) Indicates Change

[RESERVED] (C)

(C) Indicates Change

Bills calculated to determine the Average Monthly Bill Amount shall include all generally applicable charges, surcharges and credits applicable to customers receiving service under the Residential service classification, as specified in this tariff. Provided, however, customers enrolled in CAP shall not receive a bill exceeding their CAP Balance Due Amount. (C)

REAPPLICATION FOR CAP AT A NEW ADDRESS (C)

When active CAP customers move to a new address, upon application for service at such new address, said customers will continue to receive service under this Rate Schedule at the new address. If occupants change, it will be necessary to verify the household members and income. If a ratepayer, or any adult members of the household, has an overdue balance from a previous account, that balance will be reflected on the first CAP bill at the new address. If a previous account was terminated for nonpayment, CAP payments must be caught up to establish service at the new address. A customer who moves to a new premise can continue arrearage forgiveness on the remaining balance that is eligible for forgiveness. (C)

ARREARAGE FORGIVENESS

Preprogram arrearages ("PPA") are eligible for debt forgiveness. Each time a CAP customer pays their CAP Balance Due Amount on time, one twenty-fourth of the amount is forgiven ("CAP PPA Balance Forgiveness"). If a CAP customer falls behind and pays their CAP Balance Due Amount due to a zero balance, they will receive the debt forgiveness that was previously missed. These arrearages will be shown on CAP customer's bills. (C)

SPECIAL TRANSITION PROVISION - Consistent with the Company's Plan (approved by Order of the Commission on December 22, 2022 at Docket No. M-2021-3024935), on the CAP Implementation Date, the Carryover Customers' in-program LIRA arrears will be re-classified as PPA, and such amount, together with the Carryover Customers' LIRA PPA shall be subject to forgiveness under the terms specified in the previous paragraph relating to CAP PPA Balance Forgiveness. Each payment made by Carryover Customers prior to the CAP Implementation Date (meeting terms specified in the Plan to receive PPA balance forgiveness) will qualify as one of the 24 required payments in order to receive their full CAP PPA Balance Forgiveness. (C)

When a CAP customer moves to a new address, the remaining arrearage forgiveness can be utilized at the new address. (C)

LIHEAP

All LIHEAP grants will be applied to the customers' CAP responsibility in accordance with applicable Department of Human Services vendor requirements.

(C) Indicates Change

TERMINATION PROCESS

During the period April 1 through November 30:

1. If a CAP customer fails to pay the "CAP Balance Due Amount,", the Company's collection process will begin. This process includes all required regulatory notification and procedural steps. The actual termination notices mailed to CAP customers will reflect the means for avoiding termination of service. (C)
2. To avoid termination of service, the CAP customer must pay the amount set forth in the termination notice prior to the scheduled termination date.
3. The delinquent CAP participant will not be granted a payment arrangement or an extension to avoid termination of service.
4. Medical Certificates will be honored for CAP customers.
5. Service will be terminated if the customer fails to pay the notice amount (and no certified medical condition exists).

Termination notices will not be sent from December 1 until the First cycle billing portion that produces a proposed termination date of April 1 or later. Any customer who has missed any payments over the winter months will be sent a notice for termination for the missed payments. The number of missed payments should not exceed 5 months except in extenuating circumstances such as a medical certification or a complaint to the Bureau of Consumer Services.

RECONNECTION PROCESS

A ratepayer whose service is reconnected due to the submission of a medical certificate will not be reinstated in the CAP program until all requirements are met equal to those that would apply for that same customer seeking reconnection without a medical certificate.

Generally, in order to have service reconnected, the CAP customer must: (C)

1. Pay a reconnection charge.
2. Pay the entire arrearage which accrued while a CAP participant (including the current bill if after the due date).
3. In the situation where his/her account had a preprogram arrearage, the account will be eligible for continued arrearage forgiveness opportunities if the CAP customer completely pays his/her CAP program arrears and if he/she has remaining forgiveness months remaining.
4. If a customer/applicant who was previously a CAP participant elects to have service reconnected/established and receive service under the residential rate schedule, he/she will be reconnected pursuant to applicable provisions of the Public Utility Code and applicable regulations of the Commission.

RECONNECTION PROCESS (Cont',)

All customers listed on the account are responsible for the balance accrued while a CAP participant. The terms for reconnection will apply to each adult resident as a ratepayer, unless the resident can demonstrate to the Company's satisfaction extenuating circumstances including, but not limited to, divorce, abandonment, or spousal abuse, where the spouse has established a separate residence. (C)

REVERIFICATION PROCESS

Active CAP accounts are reverified periodically to determine changes in income or household size that might affect program eligibility. (C)

The CAP reverification process will require participants to reverify their status every two years unless, one of the following situations apply: (C)

(1) The CAP customer's household situation changes or they report inexplicable increased consumption and/or have not received LIHEAP. As recommended by the Universal Service evaluation, such customers would be required to reverify their status upon request. (C)

(2) The CAP customer's household: (a) has as its primary source of income any of the following: Social Security, Supplemental Security Income, or pensions; or (b) received LIHEAP benefits in the time since CAP enrollment or the last CAP re-verification. For CAP customers in this scenario, the reverification period would be three (3) years. (C)

(3) The CAP Customer reports "zero income." For CAP Customers in this scenario, the customers would be required to reverify their income every six (6) months, using the "Zero Income Form" prescribed by the Commission. (C)

RULES AND REGULATIONS

The rules and regulations set forth in this tariff shall govern, where applicable, gas service under this rate schedule. Additionally, the provisions of the Plan shall also apply to gas service under this rate schedule.

C) Indicates Change

(C)

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COMMERCIAL AND PUBLIC AUTHORITY
SERVICE RATE SCHEDULE

COMMERCIAL CLASSIFICATION

A Commercial customer shall be defined as a customer using gas in wholesale or retail trade, agriculture, forestry, fisheries, transportation, communications, sanitary services, finance, insurance, real estate and services such as clubs, hotels, auto repair, etc.

A religious or nonprofit organization, whose support is primarily from private funds shall be classified as a Commercial customer. Churches and missions (places of worship) may choose to be classified as Commercial customers, and, upon, choosing to receive service as a Commercial customer, shall remain a Commercial customer for at least twelve months. (C) (C) (C)

The nature of the customer's primary business or economic activity at the location of service determines the customer classification.

PUBLIC AUTHORITY CLASSIFICATION

This classification shall include gas supplied to buildings, offices and institutions occupied or operated by governmental agencies whose financial support is entirely or primarily obtained from public funds.

AVAILABILITY OF SERVICE

Gas service shall be available at one location, except as otherwise provided, for any Commercial or Public Authority customers. Customers served under this rate schedule will be billed according to their annual consumption level as follows. Those customers with actual deliveries of 1,000,000 cubic feet (1,000 Mcf) or less during the twelve billing months of the calendar year preceding the next-succeeding Application Period, as defined in this rate schedule, shall be considered to be a "Small" Commercial or Public Authority customer. In addition, the Small Customer category shall be further subdivided by customers who use not more than 250,000 cubic feet per year and those whose usage is more than 250,000 cubic feet but not more than 1,000,000 cubic feet per year. Those customer with actual deliveries in excess of 1,000 Mcf during the twelve billing months of the calendar year preceding the next-succeeding Application Period, as defined in this rate schedule, shall be considered to be a "Large" Commercial or Public Authority customer. The actual deliveries of gas to the Customer shall include not only volumes of gas purchased from the Company by such Customer but also volumes of Customer-owned gas transported by the Company to such Customer.

(C) Indicates Change

COMMERCIAL AND PUBLIC AUTHORITY
SERVICE RATE SCHEDULE

AVAILABILITY OF SERVICE (Cont'd)

A proposed new Commercial or Public Authority Customer, at a premises not previously receiving any service from the Company, shall be considered a "Small" Commercial/Public Authority Customer unless both the Company and the Customer agree that the projected total volume of gas, including not only volumes of gas to be purchased from the Company by such Customer but also volumes of Customer-owned gas projected to be transported by the Company to such Customer, measured in thousand cubic feet (Mcf), will be not less than 1,000 Mcf during the succeeding twelve months. A proposed new Commercial or Public Authority Customer, at a premises previously receiving service from the Company shall be classified at the same rate as the previous Commercial or Public Authority Customer at the premises unless the Company and the Customer agree that the projected total volume of gas to be transported by or purchased from the Company and consumed by the Customer justifies a different rate classification. (C) (C)

(C) Indicates Change

COMMERCIAL AND PUBLIC AUTHORITY SERVICE RATE SCHEDULE (cont.)

APPLICABILITY

Applicable in all areas served under this tariff.

MONTHLY RATE

For "Small" Commercial/Public Authority Customers using not more than 250,000 cubic feet per year:

Basic Service Charge

$27.00	per Month		

Distribution Charges

27.447¢	per 100 cubic feet		(D)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.007¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(D)
2.043¢	per 100 cubic feet	Total Gas Adjustment Charge	(D)

Natural Gas Supply Charge

50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.171¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(D)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Ride H)	
51.654¢	per 100 cubic feet	Total Natural Gas Supply Charge	(D)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.3398% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223.

The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge as set forth in this tariff.

(D) Indicates Decrease (I) Indicates Increase

COMMERCIAL AND PUBLIC AUTHORITY SERVICE RATE SCHEDULE (Cont'd)

For "Small" Commercial/Public Authority Customers using greater than 250,000 cubic feet but not more than 1,000,000 cubic feet per year:

Basic Service Charge
$37.00 per Month

Distribution Charges

25.008¢	per 100 cubic feet		(D)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.007¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(D)
2.043¢	per 100 cubic feet	Total Gas Adjustment Charge	(D)

Natural Gas Supply Charge

50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.171¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(D)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.654¢	per 100 cubic feet	Total Natural Gas Supply Charge	(D)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.3398% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223.

The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge as set forth in this tariff.

(D) Indicates Decrease (I) Indicates Increase

Commercial and Public Authority Service Rate Schedule (Cont'd)

For "Large" Commercial/Public Authority Customers:

Basic Service Charge

$151.00	per Month	

Distribution Charges

21.075¢	per 100 cubic feet		(D)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.007¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(D)
2.043¢	per 100 cubic feet	Total Gas Adjustment Charge	(D)

Natural Gas Supply Charge

50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.171¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(D)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.654¢	per 100 cubic feet	Total Natural Gas Supply Charge	(D)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.3398% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223.

The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge as set forth in this tariff.

APPLICATION PERIOD

The Application Period shall be the twelve months beginning March 1 of each year.

RULES AND REGULATIONS

The Rules and Regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

(D) Indicates Decrease (I) Indicates Increase

RESERVED FOR FUTURE USE

COMMERCIAL RIDER BDS

BUSINESS DEVELOPMENT SERVICE RIDER

APPLICABILITY

Throughout the territory served under this tariff.

AVAILABILITY OF SERVICE

This Rider is available to Commercial customers with regard to sales service under the Commercial and Public Authority Rate Schedule. This rider is not available with regard to service under Rate Schedule CPA-LBS.

TERM

To become effective on the first day of the next billing cycle following qualification and acceptance by the Company and to continue during the qualification period for five (5) years.

QUALIFICATIONS

1. Facility

The following shall be considered a "qualifying facility":

A. For new customers:
(1) a newly-constructed facility; or

(2) an existing facility that has been purchased, or leased, and has been vacant for at least six (6) months.

B. For existing customers:

(1.) any combination of new employment or investment which is equal to at least 10 percent (10%) of the existing customer's historical level of employment at the time of application. For purposes of this subsection, an investment in plant facilities of $15,000 shall be considered equivalent to one new employee.

2. Gas Usage

A. New Customers

The gas consumed by an applicant, at a qualifying facility, shall be eligible for this rate, if it is demonstrated that the facility will have gas consumption in excess of 2,400 Mcf per year.

B. Existing Customers

Incremental gas consumed by an applicant, at a qualifying facility, shall be eligible for this rate provided that the incremental load is 20% of the applicant's prior year's normalized load or 2,400 Mcf per year, whichever is less. However, such incremental usage will not qualify unless the incremental load will be 1,200 Mcf per year. To determine qualifying gas usage, the incremental load will be measured against the gas consumed by the applicant, normalized over the most recent twelve-month period preceding the date of application for which data are available.

3. Classification

Applicants who qualify for one of the following classifications, pursuant to the Standard Industrial Classification Manual (1972 edition, as amended) will be eligible for this rider:

Wholesale Trade Division -
major groups 50 and 51

Finance, Insurance and Real Estate Division -
major groups 60, 61, 62, 63 and 67

4. Application

Applications for the rate must be received by the Company at least ninety (90) days, but not more than eighteen (18) months, prior to start-up of the qualifying facility.

RATES

New Commercial customers who qualify for service under this Rider will receive a reduction to the otherwise applicable commodity rate, as stated below, for all gas usage. Existing Commercial customers who qualify for service under this Rider will receive a reduction to the otherwise applicable commodity rate, as stated below for the qualifying portion of gas usage as determined in Qualifications Section 2.B, above. Customer charges and penalties, if any, under the Commercial and Public Authority Rate Schedule, are not subject to reduction.

A. Amount of the Reduction

For years one, two and three of the qualification period, there shall be a reduction of $0.02 per 100 cubic feet of qualifying consumption under the Commercial and Public Authority Rate Schedule.

For years four and five of the qualification period, there shall be a reduction of $0.01 per 100 cubic feet of qualifying consumption under the Commercial and Public Authority Rate Schedule.

OTHER PROVISIONS

Except as modified by the terms of this Rider, all provisions of the Commercial and Public Authority Rate Schedule apply to service to the customer.

Rate Schedule CPA-LBS

LOAD BALANCING SERVICE
FOR COMMERCIAL AND PUBLIC AUTHORITY CUSTOMERS

I. APPLICABILITY

Throughout the territory served under this tariff.

II. AVAILABILITY

Sales Service and Transportation Service under this rate schedule are available to Commercial and Public Authority customers that execute an agreement for one or more twelve month periods of service under this rate schedule for incremental load used in load balancing facilities, or where, in the judgment of the Company, existing load would be displaced by an alternate fuel or an alternate source of gas. For the purposes of this rate schedule, "incremental load" shall consist of the following: (C)

(1) Any volume of gas used at gas-consuming facilities constructed or installed after May 20, 1989, that will result in additional or expanded use of gas received from the Company; or

(2) Any volume of gas used at existing gas-consuming facilities of Customer at which the Customer has not used gas taken from the Company for at least twelve (12) consecutive months.

For the purposes of this rate schedule, "load balancing facilities" shall consist of any facilities of a Customer which use incremental load.

The Customer, in its sole discretion, must determine whether it will be more advantageous for the Customer to receive service for incremental load under this rate schedule or under the Commercial and Public Authority Service rate schedule.

The Customer's load balancing facilities shall be constructed in a manner satisfactory to the Company so that the Company will be able to meter the volume of gas used by the Customer in the load balancing facilities separately from gas used by the Customer in other facilities.

The Customer's load balancing facilities must be served by a discrete gas service supply system beyond the Company's meter. During business hours, the Company shall have the right to inspect Customer's facilities to determine whether Customer's facilities, including Customer's gas service supply system and load balancing facilities, meet the requirements of this rate schedule.

(C) Indicates Change

In order to qualify for Service under this rate schedule, Customers must execute an agreement for service under this rate schedule within one (1) year after either: (1) the date of the completion of the installation of new gas-consuming facilities; or (2) the date that the Customer begins taking gas from the Company at existing facilities of the Customer which have not used gas taken from the Company for at least twelve (12) consecutive months.

III. NATURE OF SERVICE

Sales Service provided under this rate schedule shall be firm service up to the level of the Customer's Gas BDU level established below, subject to the curtailment priorities of Rule 26. Sales Service in excess of the Customer's Gas BDU level will be provided only to the extent that the Company determines, from time to time, that available gas supply and available system capacity are sufficient to provide the level of service desired by the Customer without affecting adversely the reliability of service to the Company's existing customers receiving firm service.

Transportation Service provided under this rate schedule shall be firm Service up to the level of the Customer's Margin BDU level established below, subject to the curtailment priorities of Rule 26. Transportation Service in excess of the Customer's Margin BDU level will be provided only to the extent that the Company determines, from time to time, that available system capacity is sufficient to provide the level of service desired by the Customer without affecting adversely the reliability of service to the Company's existing customers receiving firm service.

IV. MONTHLY BILL

The monthly bill, for sales service under this rate schedule, shall be the sum of the Demand Charges, as computed in Section A hereinafter, and the Commodity Charges for sales and for transportation service, as computed in Section B hereinafter.

A. DEMAND CHARGES

The monthly Demand Charges shall be the sum of (1) the product of multiplying the rate per Gas Billing Demand Unit (Gas BDU), determined as provided below, by the number of the Customer's Gas BDUs, determined as provided below, and (2) the product of multiplying the rate per Margin Billing Demand Unit (Margin BDU), determined as provided below, by the number of Margin BDUs, determined as provided below.

1. Gas Demand Charge

a. Determination of Rate Per Gas BDU

The rate per Gas BDU shall be determined as follows:

1. The purchased gas demand costs applicable to the Residential, Commercial and Public Authority, Small Volume Industrial, Intermediate Volume Industrial, Large Volume Industrial and Large Industrial classes, the "DC", shall be obtained from Rider "A" - Section 1307(f) Purchased Gas Costs.

2. The number 12 shall be multiplied by the sum of (a) the volume of gas (expressed in Mcf) purchased from the Company by all Residential, Commercial and Public Authority, Small Volume Industrial, Intermediate Volume Industrial, Large Volume Industrial and Large Industrial customers, during the Company peak Sales Month and (b) the volume of service (expressed in Mcf) to all customers under the "Monthly Volume" provisions of Rate Schedule SB, during the Company Peak Sales Month.

   (a) "Company Peak Sales Month" is defined as the calendar month within which the Company experienced the System-Wide Peak Sales Day, such month being December, January or February preceding the Section 1307(f) Application Period for which the determination of the rate per Gas BDU is being made.

   (b) "System-Wide Peak Sales Day" is defined as the day of maximum gas purchased by the Company, including all volumes of gas purchased from the Company throughout its entire system in the states of Pennsylvania and New York.

3. The amount determined in Item 1 above shall be divided by the amount determined in Item 2 above to determine the amount included in the rate for recovery of purchased gas costs.

4. The rate per Gas BDU shall be the amount for purchased gas demand costs (Item 3).

   The current rate per Gas BDU is as follows:

Purchased Gas Demand Cost	$1.0863/BDU	(I)

Each time there is a change in the provision for recovery of purchased gas costs pursuant to Rider "A" of this tariff, a recomputation shall be made, under Items 1, 2 and 3, above, of the component to be included in the rate for purchased gas demand costs and the rate per Gas BDU shall be changed accordingly.

(D) Indicates Decrease (I) Indicates Increase

b. Determination of Customer's Gas BDUs

The Customer's Gas BDUs shall be determined as follows: The actual volumes of gas purchased by the Customer from the Company and used by the Customer in the separately-metered load balancing facilities during such Customer's Peak Billing Cycle, as defined hereinafter, shall be multiplied by a fraction. The numerator shall be the number 30. The denominator shall be the number of days of service for which such Customer was billed in such Customer's Peak Billing Cycle.

The Customer's Peak Billing Cycle shall be the single billing cycle of maximum delivery to the Customer's separately-metered load balancing facilities that ended during one of the months of December, January, February and March during the period beginning with the most recently-completed billing cycle ended in December and ending with the current billing cycle.

If the customer used no gas under this rate schedule during the most recently concluded billing cycles ended in December, January, February or March, then the level of Gas BDUs applicable to Customer shall be zero (0).

2. Margin Demand Charge

a. The rate per Margin BDU shall be $.5630 per Margin BDU. (I)

b. Determination of Customer's Margin BDUs

The Customer's Margin BDU shall be determined as follows: The actual deliveries of gas to the Customer by Company, including not only volumes of gas purchased by the Customer from the Company and used by the Customer in the separately-metered load balancing facilities but also volumes of Customer-owned gas transported to the Customer's load balancing facilities through the Company's facilities, during such Customer's Peak Billing Cycle, as defined hereinafter, shall be multiplied by a fraction. The numerator shall be the number 30. The denominator shall be the number of days of service for which such Customer was billed in such Customer's Peak Billing Cycle.

The Customer's Peak Billing Cycle shall be the single billing cycle of maximum delivery to the Customer's separately-metered load balancing facilities that ended during one of the months of December, January, February and March during the period beginning with the most recently-completed billing cycle ended in December and ending with the current billing cycle.

If the Customer used no gas under this rate schedule during the most recently concluded billing cycles ended in December, January, February or March, then the level of Margin BDUs applicable to Customer shall be zero (0).

(I) Indicates Increase.

B. COMMODITY CHARGES FOR SALES AND FOR TRANSPORTATION SERVICE

1. Commodity Charge for Sales Service

The monthly Commodity Charge for Sales Service shall be the product of multiplying the rate per Mcf, determined as provided below, by the volume of gas sold to the Customer by the Company during the applicable billing cycle.

The rate per Mcf shall be determined as follows and shall be $3.9236 per Mcf, subject to revision as provided below: (D)

The current components of the rate are as follows:

Purchased Gas Commodity Costs, set forth in Rider "A"	$3.3670/Mcf	(D)
Non Gas Costs	$0.5566/Mcf	

a. Determination of Rate per Mcf

The rate per Mcf shall be the sum of:

1. The net amount per Mcf for recovery of the commodity component of purchased gas costs and for recovery or refund of "E" factor amounts, the "PGCC", as determined in Rider "A" - Section 1307(f) Purchased Gas Costs of this tariff; plus

2. The amount of $0.5566 per Mcf for recovery of non-gas costs.

Each time there is a change in the provision for recovery of purchased gas costs pursuant to Rider "A" of this tariff, a recomputation shall be made of the commodity component of purchased gas costs (Item 1, above) and the rate per Mcf shall be changed accordingly. The component included in the rate for recovery of non-gas costs shall remain constant until changed in accordance with a procedure, other than a proceeding pursuant to Section 1307(f) of the Public Utility Code, 66 Pa.C.S. Section 1307(f).

2. Commodity Charge for Transportation Service

The monthly Commodity Charge for Transportation Service shall be the product of multiplying the rate per Mcf, determined as provided below, by the volume of gas transported by the Company to the Customer's load balancing facilities.

The rate per Mcf for transportation of gas under this rate schedule shall be $1.0466 per Mcf, which includes $0.5566 for recovery of non-gas costs and $0.4900 for recovery of purchased gas.

(D) Indicates Decrease (I) Indicates Increase

V. SURCHARGE

The non-purchased gas cost Demand Charges and the non-purchased gas cost Commodity Charge for Sales Service and the non-purchased gas cost Commodity Charge for Transportation Service shall be subject to surcharges in accordance with provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge. (C)

VI. AMOUNTS TO BE INCLUDED IN OVER/UNDERCOLLECTION OF GAS COSTS

Purchased gas cost revenues billed under this rate schedule shall be included as revenues for recovery of gas costs for purposes of computing Factor "E" of Company's 1307(f) rate in accordance with procedures set forth in Rider "A" - Section 1307(f) Purchased Gas Costs.

VII. SPECIAL PROVISIONS

Monthly metered Special Provisions A through J contained in the Company's Rate Schedule for Transportation Service shall apply to transportation service under this rate schedule.

VIII. RULES AND REGULATIONS

The rules and regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

SVIS

SMALL VOLUME INDUSTRIAL SERVICE RATE SCHEDULE

INDUSTRIAL CLASSIFICATION

An Industrial customer shall be defined as a customer using gas primarily in a process which grades or changes raw material or unfinished material into another form or product including establishments in mining and manufacturing. The nature of the customer's primary business or economic activity at the location served determines the classification.

If a particular load to a manufacturing or processing plant represents gas used for plant cafeteria or a heating load, with or without processing load, whether or not separately metered, the account shall be classified as Industrial.

AVAILABILITY OF SERVICE

Gas service shall be available at one location, except as otherwise provided, for Industrial customers. All industrial customers shall receive service under this rate schedule except industrial customers eligible for service under Rate Schedule IVIS for Intermediate Volume Industrial Service, Rate Schedule LVIS for Large Volume Industrial Service or under Rate Schedule LIS for Large Industrial Service. Customers served under this rate schedule will be billed according to their annual consumption level as follows. Those customers with actual deliveries of 1,000,000 cubic feet (1,000 Mcf) or less during the twelve billing months of the calendar year preceding the next-succeeding Application Period, as defined in this rate schedule, shall be considered to be a SVIS customer. The actual deliveries of gas to the Customer shall include not only volumes of gas purchased from the Company by such Customer but also volumes of Customer-owned gas transported by the Company to such Customer.

A proposed new Industrial Customer who does not qualify for the IVIS, LVIS or LIS Rate Schedules, not previously receiving any service from the Company, shall be considered a SVIS Customer unless both the Company and the Customer agree that the projected total volume of gas, including not only volumes of gas to be purchased from the Company by such Industrial Customer but also volumes of Customer-owned gas projected to be transported by the Company to such Customer, measured in thousand cubic feet (Mcf), will be not less than 1,000 Mcf during the succeeding twelve months.

APPLICABILITY

Applicable in all areas served under this tariff.

SVIS
Small Volume Industrial Service Rate Schedule (Cont'd)

MONTHLY RATE

Basic Service Charge
$82.00 per Month

Distribution Charges

25.175¢	per 100 cubic feet		(D)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.007¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(D)
2.043¢	per 100 cubic feet	Total Gas Adjustment Charge	(D)

Natural Gas Supply Charge

50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.171¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(D)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.654¢	per 100 cubic feet	Total Natural Gas Supply Charge	(D)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.3398% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223.

The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge.

APPLICATION PERIOD

The Application Period shall be the twelve months beginning March 1 of each year.

RULES AND REGULATIONS

The Rules and Regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

(D) Indicates Decrease (I) Indicates Increase

RESERVED FOR FUTURE USE

IVIS

INTERMEDIATE VOLUME INDUSTRIAL SERVICE RATE SCHEDULE

INDUSTRIAL CLASSIFICATION

An Industrial customer shall be defined as a customer using gas primarily in a process which grades or changes raw material or unfinished material into another form or product including establishments in mining and manufacturing. The nature of the customer's primary business or economic activity at the location served determines the classification.

If a particular load to a manufacturing or processing plant represents gas used for plant cafeteria or a heating load, with or without processing load, whether or not separately metered, the account shall be classified as Industrial.

AVAILABILITY OF SERVICE

Gas service shall be available at one location, except as otherwise provided, for Industrial customers. All industrial customers shall receive service under this rate schedule except industrial customers eligible for service under Rate Schedule SVIS for Small Volume Industrial Service, Rate Schedule LVIS for Large Volume Industrial Service or under Rate Schedule LIS for Large Industrial Service. Customers served under this rate schedule will be billed according to their annual consumption level as follows. Those customers with actual deliveries in excess of 1,000 Mcf but less than 50,000 Mcf during the twelve billing months of the calendar year preceding the next-succeeding Application Period, as defined in this rate schedule, shall be considered to be an IVIS customer. The actual deliveries of gas to the Customer shall include not only volumes of gas purchased from the Company by such Customer but also volumes of Customer-owned gas transported by the Company to such Customer.

A proposed new Industrial Customer who does not qualify for the IVIS, LVIS or LIS Rate Schedules, not previously receiving any service from the Company, shall be considered a SVIS Customer unless both the Company and the Customer agree that the projected total volume of gas, including not only volumes of gas to be purchased from the Company by such Industrial Customer but also volumes of Customer-owned gas projected to be transported by the Company to such Customer, measured in thousand cubic feet (Mcf), will be not less than 1,000 Mcf during the succeeding twelve months.

APPLICABILITY

Applicable in all areas served under this tariff.

IVIS
INTERMEDIATE VOLUME INDUSTRIAL SERVICE RATE SCHEDULE (Cont'd)

MONTHLY RATE

Basic Service Charge
$252.00 per Month

Distribution Charges

17.800¢	per 100 cubic feet		(D)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.007¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(D)
2.043¢	per 100 cubic feet	Total Gas Adjustment Charge	(D)

Natural Gas Supply Charge

50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.171¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(D)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.654¢	per 100 cubic feet	Total Natural Gas Supply Charge	(D)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.3398% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223.

The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge as set forth in this tariff.

APPLICATION PERIOD

The Application Period shall be the twelve months beginning March 1 of each year.

RULES AND REGULATIONS

(D) Indicates Decrease (I) Indicates Increase

RESERVED FOR FUTURE USE

INTERMEDIATE VOLUME INDUSTRIAL SERVICE RIDER BDS

BUSINESS DEVELOPMENT SERVICE RIDER

APPLICABILITY

Throughout the territory served under this tariff.

AVAILABILITY OF SERVICE

This Rider is available to Industrial customers with regard to sales service under the Intermediate Volume Industrial Service Rate Schedule. This rider is not available with regard to service under Rate Schedule IVI-LBS.

TERM

To become effective on the first day of the next billing cycle following qualification and acceptance by the Company and to continue during the qualification period for five (5) years.

QUALIFICATIONS

1. Facility

The following shall be considered a "qualifying facility":

A. For new customers:

1) a newly-constructed facility; or

2) an existing facility that has been purchased, or leased, and has been vacant for at least six (6) months.

B. For existing customers:

1) any combination of new employment or investment which is equal to at least ten percent (10%) of the existing customer's historical level of employment at the time of application. For purposes of this subsection, an investment in plant facilities of $15,000 shall be considered equivalent to one new employee.

2. Gas Usage

A. New Customers

The gas consumed by an applicant, at a qualifying facility, shall be eligible for this rate, if it is demonstrated that the facility will have gas consumption in excess of 2,400 Mcf per year.

B. Existing Customers

Incremental gas consumed by an applicant, at a qualifying facility, shall be eligible for this rate provided that the incremental load is 20% of the applicant's prior year's normalized load or 2,400 Mcf per year, whichever is less. However, such incremental gas usage will not qualify unless the incremental load totals at least 1,200 Mcf per year. To determine qualifying gas usage, the incremental load will be measured against the gas consumed by the applicant, normalized over the most recent twelve-month period preceding the date of application for which data are available.

3. Classification

Applicants who qualify for one of the following classifications, pursuant to the Standard Industrial Classification Manual (1972 edition, as amended) will be eligible for this rider:

Manufacturing Division - major groups 20 - 39

4. Application

Applications for the rate must be received by the Company at least ninety (90) days, but not more than eighteen (18) months, prior to start-up of the qualifying facility.

RATES

New Intermediate Volume Industrial Service customers who qualify for service under this Rider will receive a reduction to the otherwise applicable commodity rate, as stated below, for all gas usage. Existing Intermediate Volume Industrial Service customers who qualify for service under this Rider will receive a reduction to the otherwise applicable commodity rate, as stated below for the qualifying portion of gas usage as determined in Qualifications Section 2.B, above. Customer charges and penalties, if any, under the Intermediate Volume Industrial Service Rate Schedule, are not subject to reduction.

A. Amount of the Reduction

For years one, two and three of the qualification period, there shall be a reduction of $0.02 per 100 cubic feet of qualifying consumption under the Intermediate Volume Industrial Service Rate Schedule.

For years four and five of the qualification period, there shall be a reduction of $0.01 per 100 cubic feet of qualifying consumption under the Intermediate Volume Industrial Service Rate Schedule.

OTHER PROVISIONS

Except as modified by the terms of this Rider, all provisions of the Intermediate Volume Industrial Service Rate Schedule apply to service to the customer.

Rate Schedule IVI-LBS

LOAD BALANCING SERVICE
FOR INTERMEDIATE VOLUME INDUSTRIAL CUSTOMERS

I. APPLICABILITY

Throughout the territory served under this tariff.

II. AVAILABILITY

Sales Service and Transportation Service under this rate schedule are available to Intermediate Volume Industrial customers that execute an agreement for one or more twelve-month periods of service under this rate schedule for incremental load used in load balancing facilities, or where, in the judgment of the Company, existing load would be displaced by an alternate fuel or an alternate source of gas. For purposes of the rate schedule, "incremental load" shall consist of the following: (C)

(1) Any volume of gas used at gas-consuming facilities constructed or installed after May 20, 1989 that will result in additional or expanded use of gas received from the Company; or

(2) Any volume of gas used at existing gas-consuming facilities of Customer at which the Customer has not used gas taken from the Company for at least twelve (12) consecutive months.

For purposes of this rate schedule, "load balancing facilities" shall consist of any facilities of a Customer which use incremental load.

The Customer, in its sole discretion, must determine whether it will be more advantageous of the Customer to receive service for incremental load under this rate schedule or under the Intermediate Volume Industrial Service rate schedule.

The customer's load balancing facilities shall be constructed in a manner satisfactory to the Company so that the Company will be able to meter the volume of gas used by the Customer in the load balancing facilities separately from gas used by the Customer in other facilities.

The Customer's load balancing facilities must be served by a discrete gas service supply system beyond the Company's meter. During business hours, the Company shall have the right to inspect Customer's facilities to determine whether customer's facilities, including Customer's gas service supply system and load balancing facilities, meet the requirements of this rate schedule.

In order to qualify for Service under this rate schedule, Customers must execute an agreement for service under this rate schedule within one (1) year after either: (1) the date of the completion of the installation of new gas consuming facilities; or (2) the date that the Customer begins taking gas from the Company at existing facilities of the customer which have not used gas taken from the Company for at least twelve (12) consecutive months.

(C) Indicates Change

III. NATURE OF SERVICE

Sales Service provided under this rate schedule shall be firm service up to the level of the Customer's Gas BDU level established below, subject to the curtailment priorities of Rule 26. Sales Service in excess of the Customer's Gas BDU level will be provided only to the extent that the Company determines, from time to time, that available gas supplies are sufficient to provide the level of service desired by the Customer without affecting adversely the reliability of service to the Company's existing customers receiving firm service.

Transportation Service provided under this rate schedule shall be firm Service up to the level of the Customer's Margin BDU level established below, subject to the curtailment priorities of Rule 26. Transportation Service in excess of the Customer's Margin BDU level will be provided only to the extent that the Company determines, from time to time, that available gas supplies are sufficient to provide the level of service desired by the Customer without affecting adversely the reliability of service to the Company's existing customers receiving firm service.

IV. MONTHLY BILL

The monthly bill, for sales service under this rate schedule, shall be the sum of the Demand Charges, as computed in Section A hereinafter, and the Commodity Charges for sales and for transportation service, as computed in Section B hereinafter.

A. DEMAND CHARGES

The monthly Demand Charges shall be the sum of (1) the product of multiplying the rate per Gas Billing Demand Unit (Gas BDU), determined as provided below, by the number of the Customer's Gas BDUs, determined as provided below, and (2) the product of multiplying the rate per Margin Billing Demand Unit (Margin BDU) determined as provided below, by the number of Margin BDUs, determined as provided below.

1. Gas Demand Charge

a. Determination of Rate Per Gas BDU

The rate per Gas BDU shall be determined as follows:

1. The purchased gas demand costs applicable to the Residential, Commercial and Public Authority, Small Volume Industrial, Intermediate Volume Industrial, Large Volume Industrial and Large Industrial classes, the "DC", shall be obtained from Rider "A" - Section 1307(f) Purchased Gas Costs.

2. The number 12 shall be multiplied by the sum of (a) the volume of gas (expressed in Mcf) purchased from the Company by all Residential, Commercial and Public Authority, Small Volume Industrial, Intermediate Volume Industrial, Large Volume

Industrial and Large Industrial customers, during the Company peak Sales Month defined in Rate Schedule CPA-LBS and (b) the volumes of service (expressed in Mcf) to all customers under the "Monthly Volume" provisions of Rate Schedule SB, during the Company Peak Sales Month defined in Rate Schedule CPA-LBS.

3. The amount determined in Item 1 above shall be divided by the amount determined in Item 2 above to determine the amount included in the rate for recovery of purchased gas costs.

4. The rate per Gas BDU shall be the amount for purchased gas demand costs (Item 3).

The current rate per Gas BDU is as follows:

Purchased Gas Demand Cost	$1.0863/BDU	(I)

Each time there is a change in the provision for recovery of purchased gas costs pursuant to Rider "A" of this tariff, a recomputation shall be made, under Items 1, 2 and 3, above, of the component to be included in the rate for purchased gas demand costs and the rate per Gas BDU shall be changed accordingly.

b. Determination of Customer's Gas BDUs

The Customer's Gas BDUs shall be determined as follows: The actual volumes of gas purchased by the Customer from the Company and used by the Customer in the separately-metered load balancing facilities during such Customer's Peak billing Cycle, as defined hereinafter, shall be multiplied by a fraction. The numerator shall be the number 30. The denominator shall be the number of days of service for which such Customer was billed in such Customer's Peak Billing Cycle.

The Customer's Peak Billing Cycle shall be the single billing cycle of maximum delivery to the Customer's separately-metered load balancing facilities that ended during one of the months of December, January, February and March during the period beginning with the most recently-completed billing cycle ended in December and ending with the current billing cycle.

If the customer used no gas under this rate schedule during the most recently concluded billing cycles ended in December, January, February or March, then the level of Gas BDUs applicable to Customer shall be zero (0).

2. Margin Demand Charge

a. The rate per Margin BDU shall be $0.5122 per Margin BDU.

b. Determination of Customer's Margin BDUs

The Customer's Margin BDUs shall be determined as follows: The actual deliveries of gas to the Customer by Company, including not only volumes of gas purchased by the Customer from the Company and used by the Customer in the separately-metered load balancing facilities but also volumes of Customer-owned gas transported to the Customer's load balancing facilities through the Company's facilities, during such Customer's Peak billing Cycle, as defined hereinafter, shall be multiplied by a fraction. The numerator shall be the number 30. The denominator shall be the number of days of service for which such Customer was billed in such Customer's Peak Billing Cycle.

The Customer's Peak Billing Cycle shall be the single billing cycle of maximum delivery to the Customer's separately-metered load balancing facilities that ended during one of the months of December, January, February and March during the period beginning with the most recently-completed billing cycle ended in December and ending with the current billing cycle.

If the customer used no gas under this rate schedule during the most recently concluded billing cycles ended in December, January, February or March, then the level of Margin BDUs applicable to Customer shall be zero (0).

B. COMMODITY CHARGES FOR SALES AND FOR TRANSPORTATION SERVICE

1. Commodity Charge for Sales Service

The monthly Commodity Charge for Sales Service shall be the product of multiplying the rate per Mcf, determined as provided below, by the volume of gas sold to the Customer by the Company during the applicable billing cycle.

The rate per Mcf shall be determined as follows and shall be $3.7478 per Mcf, subject to revision as provided below: (D)

The current components of the rate are as follows:

Purchased Gas Commodity Costs, set forth in Rider "A"	$3.3670/Mcf	(D)
Non Gas Costs	$0.3808/Mcf	

a. Determination of Rate per Mcf

The rate per Mcf shall be the sum of:

1. The net amount per Mcf for recovery of the commodity component of purchased gas costs and for recovery or refund of "E" factor amounts, the "PGCC", as determined in Rider "A" - Section 1307(f) Purchased Gas Costs of this tariff; plus

(D) Indicates Decrease (I) Indicates Increase

2. The amount of $0.3808 per Mcf for recovery of non-gas costs.

Each time there is a change in the provision for recovery of purchased gas costs pursuant to Rider "A" of this tariff, a recomputation shall be made of the commodity component of purchased gas costs (Item 1, above) and the rate per Mcf shall be changed accordingly. The component included in the rate for recovery of non-gas costs shall remain constant until changed in accordance with a procedure, other than a proceeding pursuant to Section 1307(f) of the Public Utility Code, 66 Pa.C.S. Section 1307(f).

2. Commodity Charge for Transportation Service

The monthly Commodity Charge for Transportation Service shall be the product of multiplying the rate per Mcf, determined as provided below, by the volume of gas transported by the Company to the Customer's load balancing facilities.

The rate per Mcf for transportation of gas under this rate schedule shall be $0.8708 per Mcf, which includes $0.3808 for recovery of non-gas costs and $0.4900 for recovery of purchased gas. (I)

V. SURCHARGE

The non-purchased gas cost Demand Charges and the non-purchased gas cost Commodity Charge for Sales Service and the non-purchased gas cost Commodity Charge for Transportation Service shall be subject to surcharges in accordance with provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge.

VI. AMOUNTS TO BE INCLUDED IN OVER/UNDERCOLLECTION OF GAS COSTS

Purchased gas cost revenues billed under this rate schedule shall be included as revenues for recovery of gas costs for purposes of computing Factor "E" of Company's 1307(f) rate in accordance with procedures set forth in Rider "A" - Section 1307(f) Purchased Gas Costs.

VII. SPECIAL PROVISIONS

Monthly metered Special Provisions A through J contained in the Company's Rate Schedule for Transportation Service shall apply to transportation service under this rate schedule.

VIII. RULES AND REGULATIONS

The rules and regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

RATE SCHEDULE LVIS

LARGE VOLUME INDUSTRIAL SERVICE

INDUSTRIAL CLASSIFICATION

An Industrial Customer is a customer using gas primarily in a process which grades or changes raw material or unfinished material into another form or product including establishments in mining and manufacturing. The nature of the customer's primary business or economic activity at the location served governs, irrespective of whether a particular load to a manufacturing or processing plant represents gas used for plant cafeteria or a heating load, with or without processing load, whether or not separately metered.

APPLICABILITY

Applicable in all areas served under this tariff. (C)

AVAILABILITY OF SERVICE

I. MANDATORY SERVICE

Service under this rate schedule is available to, and is mandatory for, Industrial Customers, except customers receiving service pursuant to Rate Schedule LIS - Large Industrial Service that meet any of the following criteria:

A. The total of the Company's actual deliveries of gas to the Industrial Customer, including not only volumes of gas purchased from the Company by such Industrial Customer but also volumes of Industrial Customer-owned gas transported by the Company to such Industrial Customer, measured in thousand cubic feet (Mcf), during the twelve billing months of the calendar year preceding the next-succeeding Application Period, as defined in this rate schedule, shall have been not less than 50,000 Mcf; or

B. A proposed new Industrial Customer, not previously receiving any service from the Company, for which the Company and the Industrial Customer agree that the projected total volume of gas, including not only volumes of gas to be purchased from the Company by such Industrial Customer but also volumes of Industrial Customer-owned gas projected to be transported by the Company to such Industrial Customer, measured in thousand cubic feet (Mcf), will be not less than 50,000 Mcf during the succeeding twelve months; or

(C) Indicates Change

LVIS
Large Volume Industrial Service (Cont'd)

C. An Industrial Customer, for which the Company estimates that the total volumes of gas purchased from the Company or transported by the Company during the next succeeding twelve months will be not less than 50,000 Mcf, if the Industrial Customer has used total volumes of gas in at least one billing month of not less than 4,167 Mcf, even if the Customer disagrees with the Company's estimate.

D. An Industrial Customer for which the Company estimates that total volumes of gas to be used by the customer during the next succeeding twelve months will not be less than 50,000 Mcf of gas per year whether the gas is purchased by the Industrial Customer from the Company, delivered by the Company to the Industrial Customer, or obtained by the customer from another source.

An Industrial Customer that meets the above criteria under this rate schedule at the beginning of an Application Period is required to continue to be subject to this rate schedule during all months of such Application Period. An Industrial Customer that meets the above criteria under this rate schedule during an Application Period is required to continue to be subject to this rate schedule during all or remaining months of such Application Period.

MONTHLY RATE

Basic Service Charge
$1,023.00 per Month

Distribution Charges
14.696¢ per 100 cubic feet (D)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.007¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(D)
2.043¢	Per 100 cubic feet	Total Gas Adjustment Charge	(D)

(D) Indicates Decrease (I) Indicates Increase

LVIS
Large Volume Industrial Service (Cont'd)

Natural Gas Supply Charge			
50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.171¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(D)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.654¢	per 100 cubic feet	Total Natural Gas Supply Charge	(D)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.3398% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223.

The above non-purchased gas cost rates shall be subject to surcharges in accordance with provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge.

RULES AND REGULATIONS

The Rules and Regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

APPLICABLE PERIOD

The Application Period shall be the twelve months beginning March 1 of each year.

LARGE VOLUME INDUSTRIAL SERVICE RIDER BDS

BUSINESS DEVELOPMENT SERVICE RIDER

APPLICABILITY

Throughout the territory served under this tariff.

AVAILABILITY OF SERVICE

This Rider is available to Industrial customers with regard to sales service under the Large Volume Industrial Service Rate Schedule. This Rider is not available with regard to service under Rate Schedule LVI-LBS.

TERM

To become effective on the first day of the next billing cycle following qualification and acceptance by the Company and to continue during the qualification period for five (5) years.

QUALIFICATIONS

1. Facility

The following shall be considered a "qualifying facility":

A. For new customers:

(1) a newly-constructed facility; or

(2) an existing facility that has been purchased, or leased, and has been vacant for at least six (6) months.

B. For existing customers:

(1) any combination of new employment or investment which is equal to at least ten percent 10% of the existing customer's historical level of employment at the time of application. For purposes of this subsection, an investment in plant facilities of $15,000 shall be considered equivalent to one new employee.

2. Gas Usage

A. New Customers

The gas consumed by an applicant, at a qualifying facility, shall be eligible for this rate, provided there is sufficient consumption to qualify for the Large Volume Industrial Service Rate Schedule.

B. Existing Customers

Incremental gas consumed by an applicant, at a qualifying facility, shall be eligible for this rate provided that the incremental load is greater than 12,000 Mcf per year and the total annual consumption is sufficient to qualify for the Large Volume Industrial Service Rate Schedule. To determine qualifying gas usage, the incremental load will be measured against the gas consumed by the applicant over the most recent twelve-month period preceding the date of application for which data are available.

3. Classification

Applicants who qualify for one of the following classifications, pursuant to the Standard Industrial Classification Manual (1972 edition, as amended) will be eligible for this rider:

Manufacturing Division - major groups 20 - 39

4. Application

Applications for the rate must be received by the Company at least ninety (90) days, but not more than eighteen (18) months, prior to start-up of the qualifying facility.

RATES

New Large Volume Industrial Service customers who qualify for service under this Rider will receive a reduction to the otherwise applicable commodity rate, as stated below, for all gas usage. Existing Large Volume Industrial Service customers who qualify for service under this Rider will receive a reduction to the otherwise applicable commodity rate, as stated below for the qualifying portion of gas usage as determined in Qualifications Section 2.B, above. Customer charges and penalties, if any, under the Large Volume Industrial Service Rate Schedule, are not subject to reduction.

A. Amount of the Reduction

For years one, two and three of the qualification period, there shall be a reduction of $0.02 per 100 cubic feet of qualifying consumption under the Large Volume Industrial Service Rate Schedule.

For years four and five of the qualification period, there shall be a reduction of $0.01 per 100 cubic feet of qualifying consumption under the Large Volume Industrial Service Rate Schedule.

OTHER PROVISIONS

Except as modified by the terms of this Rider, all provisions of the Large Volume Industrial Service Rate Schedule apply to service to the customer.

Rate Schedule LVI-LBS

LOAD BALANCING SERVICE
FOR LARGE VOLUME INDUSTRIAL CUSTOMERS

I. APPLICABILITY

Throughout the territory served under this tariff.

II. AVAILABILITY

Sales Service and Transportation Service under this rate schedule are available to Large Volume Industrial customers that execute an agreement for one or more twelve-month periods of service under this rate schedule for incremental load used load used in load balancing facilities, or where, in the judgment of the Company, existing load would be displaced by an alternate fuel or an alternate source of gas. For the purposes of this rate schedule, "incremental load" shall consist of the following: (C)

(1) Any volume of gas used at gas-consuming facilities constructed or installed after May 20, 1989, that will result in additional or expanded use of gas received from the Company; or

(2) Any volume of gas used at existing gas-consuming facilities of Customer at which the Customer has not used gas taken from the Company for at least twelve (12) consecutive months.

For purposes of this rate schedule, "load balancing facilities" shall consist of any facilities of a Customer which use incremental load.

The Customer, in its sole discretion, must determine whether it will be more advantageous for the Customer to receive service for incremental load under this rate schedule or under the Large Volume Industrial Service rate schedule.

The Customer's load balancing facilities shall be constructed in a manner satisfactory to the Company so that the Company will be able to meter the volume of gas used by the Customer in the load balancing facilities separately from gas used by the Customer in other facilities.

The Customer's load balancing facilities must be served by a discrete gas service supply system beyond the Company's meter. During business hours, the Company shall have the right to inspect Customer's facilities to determine whether Customer's facilities, including Customer's gas service supply system and load balancing facilities, meet the requirements of this rate schedule.

In order to qualify for service under this rate schedule, Customers must execute an agreement for service under this rate schedule within one (1) year after either: (1) the date of the completion of the installation of new gas-consuming facilities; or (2) the date that the Customer begins taking gas from the Company at existing facilities of the Customer which have not used gas taken from the Company for at least twelve (12) consecutive months.

Service under this rate schedule shall not be subject to Rate Schedule BP - Service for customers with Bypass facilities.

(C) Indicates Change

III. NATURE OF SERVICE

Sales Service provided under this rate schedule shall be firm service up to the level of the Customer's Gas BDU level established below, subject to the curtailment priorities of Rule 26. Sales Service in excess of the Customer's Gas BDU level will be provided only to the extent that the Company determines, from time to time, that available gas supply and available system capacity are sufficient to provide the level of service desired by the Customer without affecting adversely the reliability of service to the Company's existing customers receiving firm service.

Transportation Service provided under this rate schedule shall be firm Service up to the level of the Customer's Margin BDU level established below, subject to the curtailment priorities of Rule 26. Transportation Service in excess of the Customer's Margin BDU level will be provided only to the extent that the Company determines, from time to time, that available system capacity is sufficient to provide the level of service desired by the Customer without affecting adversely the reliability of service to the Company's existing customers receiving firm service.

IV. MONTHLY BILL

The monthly bill, for sales service under this rate schedule, shall be the sum of the Demand Charges, as computed in Section A hereinafter, and the Commodity Charges for sales and for transportation service, as computed in Section B hereinafter.

A. DEMAND CHARGES

The monthly Demand Charges shall be the sum of (1) the product of multiplying the rate per Gas Billing Demand Unit (Gas BDU), determined as provided below, by the number of the Customer's Gas BDUs, determined as provided below, and (2) the product of multiplying the rate per Margin Billing Demand Unit (Margin BDU) determined as provided below, by the number of Margin BDUs, determined as provided below.

1. Gas Demand Charge

a. Determination of Rate Per Gas BDU

The rate per Gas BDU shall be determined as follows:

1. The purchased gas demand costs applicable to the Residential, Commercial and Public Authority, Small Volume Industrial, Intermediate Volume Industrial, Large Volume Industrial and Large Industrial classes, the "DC" shall be obtained under Rider "A" - Section 1307(f) Purchased Gas Costs.

2. The number 12 shall be multiplied by the sum of (a) the volume of gas (expressed in Mcf) purchased from the Company by all Residential,

Commercial and Public Authority, Small Volume Industrial, Intermediate Volume Industrial, Large Volume Industrial and Large Industrial customers, during the Company Peak Sales Month defined in Rate Schedule CPA-LBS and (b) the volume of service (expressed in Mcf) to all customers under the "Monthly Volume" provisions of Rate Schedule SB, during the Company Peak Sales Month defined in Rate Schedule CPA-LBS.

3. The amount determined in Item 1 above shall be divided by the amount determined in Item 2 above to determine the amount included in the rate for recovery of purchased gas costs.

4. The rate per Gas BDU shall be the amount for purchased gas demand costs (Item 3).

The current rate per Gas BDU is as follows:

Purchased Gas Demand Cost	$1.0863/BDU	(I)

Each time there is a change in the provision for recovery of purchased gas costs pursuant to Rider "A" of this tariff, a recomputation shall be made, under Items 1, 2 and 3, above, of the component to be included in the rate for purchased gas demand costs and the rate per Gas BDU shall be changed accordingly.

b. Determination of Customer's Gas BDUs

The Customer's Gas BDUs shall be determined as follows: The actual volumes of gas purchased by the Customer from the Company and used by the Customer in the separately-metered qualifying load balancing facilities during such Customer's Peak billing Cycle, as defined hereinafter, shall be multiplied by a fraction. The numerator shall be the number 30. The denominator shall be the number of days of service for which such Customer was billed in such Customer's Peak Billing Cycle.

The Customer's Peak Billing Cycle shall be the single billing cycle of maximum delivery to the Customer's separately-metered qualifying load balancing facilities that ended during on of the months of December, January, February and March during the period beginning with the most recently-completed billing cycle and ending with the current billing cycle.

If the customer used no gas under this rate schedule during the most recently concluded billing cycles ended in December, January, February or March, then the level of Gas BDUs applicable to Customer shall be zero (0).

(D) Indicates Decrease (I) Indicates Increase

2. Margin Demand Charge

a. The rate per Margin BDU shall be $0.3182 per Margin BDU.

b. Determination of Customer's Margin BDUs

The Customer's Margin BDUs shall be determined as follows: The actual deliveries of gas to the Customer by Company, including not only volumes of gas purchased by the Customer from the Company and used by the Customer in the separately-metered load balancing facilities but also volumes of Customer-owned gas transported to the Customer's load balancing facilities through the Company's facilities, during such Customer's Peak billing Cycle, as defined hereinafter, shall be multiplied by a fraction. The numerator shall be the number 30. The denominator shall be the number of days of service for which such Customer was billed in such Customer's Peak Billing Cycle.

The Customer's Peak Billing Cycle shall be the single billing cycle of maximum delivery to the Customer's separately-metered load balancing facilities that ended during one of the months of December, January, February and March during the period beginning with the most recently-completed billing cycle ended in December and ending with the current billing cycle.

If the customer used no gas under this rate schedule during the most recently concluded billing cycles ended in December, January, February or March, then the level of Margin BDUs applicable to Customer shall be zero (0).

B. COMMODITY CHARGES FOR SALES AND FOR TRANSPORTATION SERVICE

1. Commodity Charge for Sales Service

The monthly Commodity Charge for Sales Service shall be the product of multiplying the rate per Mcf, determined as provided below, by the volume of gas sold to the Customer by the Company during the applicable billing cycle.

The rate per Mcf shall be determined as follows and shall be $3.6143 per Mcf, subject to revision as provided below: (D)

The current components of the rate are as follows:

Purchased Gas Commodity Costs, set forth in Rider "A"	$3.3670/Mcf	(D)
Non Gas Costs	$0.2473/Mcf	

a. Determination of Rate per Mcf

The rate per Mcf shall be the sum of:

1. The net amount per Mcf for recovery of the commodity component of purchased gas costs and for recovery or refund of "E" factor amounts, the "PGCC", as determined in Rider "A" - Section 1307(f) Purchased Gas Costs of this tariff; plus

2. The amount of $0.2473 per Mcf for recovery of non-gas costs.

Each time there is a change in the provision for recovery of purchased gas costs pursuant to Rider "A" of this tariff, a recomputation shall be made of the commodity component of purchased gas costs (Item 1, above) and the rate per Mcf shall be changed accordingly. The component included in the rate for recovery of non-gas costs shall remain constant until changed in accordance with a procedure, other than a proceeding pursuant to Section 1307(f) of the Public Utility Code, 66 Pa.C.S. Section 1307(f).

2. Commodity Charge for Transportation Service

The monthly Commodity Charge for Transportation Service shall be the product of multiplying the rate per Mcf, determined as provided below, by the volume of gas transported by the Company to the Customer's load balancing facilities.

The rate per Mcf for transportation of gas under this rate schedule shall be $0.7373 per Mcf, which includes $0.2473 for recovery of non-gas costs and $0.4900 for recovery of purchased gas. (I)

V. SURCHARGE

The non-purchased gas cost Demand Charges and the non-purchased gas cost Commodity Charge for Sales Service and the non-purchased gas cost Commodity Charge for Transportation Service shall be subject to surcharges in accordance with provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge as set forth in this tariff.

VI. AMOUNTS TO BE INCLUDED IN OVER/UNDERCOLLECTION OF GAS COSTS

Purchased gas cost revenues billed under this rate schedule shall be included as revenues for recovery of gas costs for purposes of computing Factor "E" of Company's 1307(f) rate in accordance with procedures set forth in Rider "A" - Section 1307(f) Purchased Gas Costs.

VII. SPECIAL PROVISIONS

Monthly metered Special Provisions A through J contained in the Company's Rate Schedule for Transportation Service shall apply to transportation service under this rate schedule.

VIII. RULES AND REGULATIONS

The rules and regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

RATE SCHEDULE LIS

LARGE INDUSTRIAL SERVICE

INDUSTRIAL CLASSIFICATION

An Industrial Customer is a customer using gas primarily in a process which grades or changes raw material or unfinished material into another form or product including establishments in mining and manufacturing. The nature of the customer's primary business or economic activity at the location served governs, irrespective of whether a particular load to a manufacturing or processing plant represents gas used for plant cafeteria or a heating load, with or without processing load, whether or not separately metered.

APPLICABILITY

Applicable in all areas served under this tariff. (C)

AVAILABILITY OF SERVICE

I. MANDATORY SERVICE

Service under this rate schedule is available to, and is mandatory for, Industrial Customers that meet any of the following criteria:

A. The total of the Company's actual deliveries of gas to the Industrial Customer, including not only volumes of gas purchased from the Company by such Industrial Customer but also volumes of Customer-owned gas transported by the Company to such Industrial Customer, measured in thousand cubic feet (Mcf), during the twelve billing months of the calendar year preceding the next-succeeding Application Period, as defined in this rate schedule, shall have been not less than 200,000 Mcf; or

B. A proposed new Industrial Customer, not previously receiving any service from the Company, for which the Company and the Industrial Customer agree that the projected total volume of gas, including not only volumes of gas to be purchased from the Company by such Industrial Customer but also volumes of Customer-owned gas projected to be transported by the Company to such Industrial Customer, measured in thousand cubic feet (Mcf), will be not less than 200,000 Mcf during the succeeding twelve months; or

(C) Indicates Change

LIS
Large Industrial Service (Cont'd)

C. An Industrial Customer, for which the Company estimates that the total volumes of gas purchased from the Company or transported by the Company during the next succeeding twelve months will be not less than 200,000 Mcf, if the Industrial Customer has used total volumes of gas in at least one billing month of not less than 17,000 Mcf, even if the Customer disagrees with the Company's estimate.

An Industrial Customer that meets the above criteria under this rate schedule at the beginning of an Application Period is required to continue to be subject to this rate schedule during all months of such Application Period. An Industrial Customer that meets the above criteria under this rate schedule during an Application Period is required to continue to be subject to this rate schedule during all or remaining months of such Application Period.

MONTHLY RATE

Basic Service Charge
$1,165.00 per Month

Distribution Charges
10.446¢ per 100 cubic feet (D)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.007¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(D)
2.043¢	per 100 cubic feet	Total Gas Adjustment Charge	(D)

(D) Indicates Decrease (I) Indicates Increase

LIS
Large Industrial Service (Cont'd)

Natural Gas Supply Charge			
50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.171¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(D)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.654¢	per 100 cubic feet	Total Natural Gas Supply Charge	(D)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.3398% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223.

The above non-purchased gas cost rates shall be subject to surcharges in accordance with provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge.

GAS SHORTAGE CURTAILMENT

Service under this schedule to an LIS Industrial Customer is subject to curtailment and excess consumption penalty as set forth in Rule 26 of this tariff.

RULES AND REGULATIONS

The rules and regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

(D) Indicates Decrease (I) Indicates Increase

Rate Schedule LI-LBS

LOAD BALANCING SERVICE
FOR LARGE INDUSTRIAL CUSTOMERS

I. APPLICABILITY

Throughout the territory served under this tariff.

II. AVAILABILITY

Sales Service and Transportation Service under this rate schedule are available to Large Industrial customers that execute an agreement for one or more twelve-month periods of service under this rate schedule for incremental load used in load balancing facilities, or where, in the judgment of the Company, existing load would be displaced by an alternate fuel or an alternate source of gas. For the purposes of this rate schedule, "incremental load" shall consist of the following: (C)

(1) Any volume of gas used at gas-consuming facilities constructed or installed after May 20, 1989, that will result in additional or expanded use of gas received from the Company; or

(2) Any volume of gas used at existing gas-consuming facilities of Customer at which the Customer has not used gas taken from the Company for at least twelve (12) consecutive months.

For the purposes of this rate schedule, "load balancing facilities" shall consist of any facilities of a Customer which use incremental load.

The Customer, in its sole discretion, must determine whether it will be more advantageous for the Customer to receive service for incremental load under this rate schedule or under the Large Industrial Service rate schedule.

The Customer's load balancing facilities shall be constructed in a manner satisfactory to the Company so that the Company will be able to meter the volume of gas used by the Customer in the load balancing facilities separately from gas used by the Customer in other facilities.

The Customer's load balancing facilities must be served by a discrete gas service supply system beyond the Company's meter. During business hours, the Company shall have the right to inspect Customer's facilities to determine whether Customer's facilities, including Customer's gas service supply system and load balancing facilities, meet the requirements of this rate schedule.

In order to qualify for service under this rate schedule, Customers must execute an agreement for service under this rate schedule within one (1) year after either: (1) the date of the completion of the installation of new gas-consuming facilities; or (2) the date that the Customer begins taking gas from the Company at existing facilities of the Customer which have not used gas taken from the Company for at least twelve (12) consecutive months.

Service under this Rate Schedule shall not be subject to Rate Schedule BP - service for customers with bypass facilities.

(C) Indicates Change

III. NATURE OF SERVICE

Sales Service provided under this rate schedule shall be firm service up to the level of the Customer's Gas BDU level established below, subject to the curtailment priorities of Rule 26. Sales Service in excess of the Customer's Gas BDU level will be provided only to the extent that the Company determines, from time to time, that available gas supply and available system capacity are sufficient to provide the level of service desired by the Customer without affecting adversely the reliability of service to the Company's existing customers receiving firm service.

Transportation Service provided under this rate schedule shall be firm Service up to the level of the Customer's Margin BDU level established below, subject to the curtailment priorities of Rule 26. Transportation Service in excess of the Customer's Margin BDU level will be provided only to the extent that the Company determines, from time to time, that available gas system capacity is sufficient to provide the level of service desired by the Customer without affecting adversely the reliability of service to the Company's existing customers receiving firm service.

IV. MONTHLY BILL

The monthly bill, for sales service under this rate schedule, shall be the sum of the Demand Charges, as computed in Section A hereinafter, and the Commodity Charges for sales and for transportation service, as computed in Section B hereinafter.

A. DEMAND CHARGES

The monthly Demand Charges shall be the sum of (1) the product of multiplying the rate per Gas Billing Demand Unit (Gas BDU), determined as provided below, by the number of the Customer's Gas BDUs, determined as provided below, and (2) the product of multiplying the rate per Margin Billing Demand Unit (Margin BDU) determined as provided below, by the number of Margin BDUs, determined as provided below.

1. Gas Demand Charge

a. Determination of Rate Per Gas BDU

The rate per Gas BDU shall be determined as follows:

1. The purchased gas demand costs applicable to the Residential, Commercial and Public Authority, Small Volume Industrial, Intermediate Volume Industrial, Large Volume Industrial and Large Industrial classes, the "DC", shall be obtained under Rider "A" - Section 1307(f) Purchased Gas Costs.

2. The number 12 shall be multiplied by the sum of (a) the volume of gas (expressed in Mcf) purchased from the Company by all Residential, Commercial and Public Authority, Small Volume Industrial, Intermediate Volume Industrial, Large Volume Industrial and Large Industrial customers, during the Company Peak Sales Month defined in Rate Schedule CPA

LBS and (b) volume of service (expressed in Mcf) to all customers under the "Monthly Volume" provisions of Rate Schedule SB, during the Company Peak Sales Month defined in Rate Schedule CPA-LBS.

3. The amount determined in Item 1 above shall be divided by the amount determined in Item 2 above to determine the amount included in the rate for recovery of purchased gas costs.

4. The rate per Gas BDU shall be the amount for purchased gas demand costs (Item 3).

The current rate per Gas BDU is as follows:

Purchased Gas Demand Cost	$1.0863/BDU	(I)

Each time there is a change in the provision for recovery of purchased gas costs pursuant to Rider "A" of this tariff, a recomputation shall be made, under Items 1, 2 and 3, above, of the component to be included in the rate for purchased gas demand costs and the rate per Gas BDU shall be changed accordingly.

b. Determination of Customer's Gas BDUs

The Customer's Gas BDUs shall be determined as follows: The actual volumes of gas purchased by the Customer from the Company and used by the Customer in the separately-metered load balancing facilities during such Customer's Peak billing Cycle, as defined hereinafter, shall be multiplied by a fraction. The numerator shall be the number 30. The denominator shall be the number of days of service for which such Customer was billed in such Customer's Peak Billing Cycle.

The Customer's Peak Billing Cycle shall be the single billing cycle of maximum delivery to the Customer's separately-metered load balancing facilities that ended during one of the months of December, January, February and March during the period beginning with the most recently-completed billing cycle ended in December and ending with the current billing cycle.

If the customer used no gas under this rate schedule during the most recently concluded billing cycles ended in December, January, February or March, then the level of Gas BDUs applicable to Customer shall be zero (0).

2. Margin Demand Charge

a. The rate per Margin BDU shall be $0.2517 per Margin BDU.

b. Determination of Customer's Margin BDUs

The Customer's Margin BDUs shall be determined as follows: The actual deliveries of gas to the Customer by Company, including not only volumes of gas purchased by the Customer from the Company and used by the Customer in the separately-metered load balancing facilities but also volumes of Customer-owned gas transported to the Customer's load balancing facilities through the Company's facilities, during such Customer's Peak billing Cycle, as defined hereinafter, shall be multiplied by a fraction. The numerator shall be the number 30. The denominator shall be the number of days of service for which such Customer was billed in such Customer's Peak Billing Cycle.

The Customer's Peak Billing Cycle shall be the single billing cycle of maximum delivery to the Customer's separately-metered load balancing facilities that ended during one of the months of December, January, February and March during the period beginning with the most recently-completed billing cycle ended in December and ending with the current billing cycle.

If the customer used no gas under this rate schedule during the most recently concluded billing cycles ended in December, January, February or March, then the level of Margin BDUs applicable to Customer shall be zero (0).

B. COMMODITY CHARGES FOR SALES AND FOR TRANSPORTATION SERVICE

1. Commodity Charge for Sales Service

The monthly Commodity Charge for Sales Service shall be the product of multiplying the rate per Mcf, determined as provided below, by the volume of gas sold to the Customer by the Company during the applicable billing cycle.

The rate per Mcf shall be determined as follows and shall be $3.5594 per Mcf, subject to revision as provided below: (D)

The current components of the rate are as follows:

Purchased Gas Commodity Costs, set forth in Rider "A"	$3.3670/Mcf	(D)
Non Gas Costs	$0.1924/Mcf	

a. Determination of Rate per Mcf

The rate per Mcf shall be the sum of:

(D) Indicates Decrease (I) Indicates Increase

1. The net amount per Mcf for recovery of the commodity component of purchased gas costs and for recovery or refund of "E" factor amounts, the "PGCC", as determined in Rider "A" - Section 1307(f) Purchased Gas Costs of this tariff; plus

2. The amount of $.1924 per Mcf for recovery of non-gas costs.

Each time there is a change in the provision for recovery of purchased gas costs pursuant to Rider "A" of this tariff, a recomputation shall be made of the commodity component of purchased gas costs (Item 1, above) and the rate per Mcf shall be changed accordingly. The component included in the rate for recovery of non-gas costs shall remain constant until changed in accordance with a procedure, other than a proceeding pursuant to Section 1307(f) of the Public Utility Code, 66 Pa.C.S. Section 1307(f).

2. Commodity Charge for Transportation Service

The monthly Commodity Charge for Transportation Service shall be the product of multiplying the rate per Mcf, determined as provided below, by the volume of gas transported by the Company to the Customer's load balancing facilities.

The rate per Mcf for transportation of gas under this rate schedule shall be $0.6824 per Mcf, which includes $0.1924 for recovery of non-gas costs and $0.4900 for recovery of purchased gas. (I)

V. SURCHARGE

The non-purchased gas cost Demand Charges and the non-purchased gas cost Commodity Charge for Sales Service and the non-purchased gas cost Commodity Charge for Transportation Service shall be subject to surcharges in accordance with provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge as set forth in this tariff.

VI. AMOUNTS TO BE INCLUDED IN OVER/UNDERCOLLECTION OF GAS COSTS

Purchased gas cost revenues billed under this rate schedule shall be included as revenues for recovery of gas costs for purposes of computing Factor "E" of Company's 1307(f) rate in accordance with procedures set forth in Rider "A" - Section 1307(f) Purchased Gas Costs.

VII. SPECIAL PROVISIONS

Monthly metered Special Provisions A through J contained in the Company's Rate Schedule for Transportation Service shall apply to transportation service under this rate schedule.

VIII. RULES AND REGULATIONS

The rules and regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

(D) Indicates Decrease (I) Indicates Increase

RATE SCHEDULE – NGV

NATURAL GAS VEHICLE SERVICE

I. APPLICABILITY

Throughout the territory served under this tariff.

II. AVAILABILITY

Sales Service under this rate schedule is available for use of natural gas by a customer directly in a natural gas motor vehicle ("NGV").

III. NATURE OF SERVICE

Service provided in this rate schedule shall be firm service subject to the curtailment priorities of Rule 26. For curtailment purposes, service under this rate schedule shall be defined as curtailment priority number (6), firm large noncritical commercial and industrial requirements other than requirement for boiler fuel use.

IV. RATE

Rates per 100 cu. Ft. shall be established by the Company on the first day of each calendar month for each of the categories set forth below to compete with alternative vehicle fuels. The rates shall not be less than the 100% load factor base cost of gas, plus the take-or-pay surcharge, plus the surcharge for Transition Cost, plus the incremental operating cost incurred by the Company for operating Company owned NGV compression equipment on a per Ccf basis, if any, plus $0.01 per cu. ft., plus the state tax adjustment surcharge, and not more than the tailblock rate of the Commercial and Public Authority Service Rate Schedule, including all applicable surcharges, plus the incremental operating cost incurred by the Company for operating Company owned NGV compression equipment on a per Ccf basis, if any.

The 100% load factor base cost of gas shall be $0.44533 per 100 cu. ft. (D)
(as calculated by adding the purchase gas components of the Load Balancing Service Rates).

Purchased Gas 100% Load Factor Demand Cost	$0.10863/Ccf	(I)
plus		
Purchased Gas Commodity Cost	$0.33670/Ccf	(D)
Equals		
100% Load Factor Base Cost of Gas	$0.44533/Ccf	(D)

The incremental operating cost for compression shall be $0.13436/Ccf.

(D) Indicates Decrease (I) Indicates Increase

Natural gas vehicle customers are classified into the following categories:

NGV(1) All natural gas vehicle customers utilizing Company owned filling facilities. A uniform rate shall be established each month within the parameters set forth above, for customers utilizing Company-owned filling facilities.

The minimum NGV(1) rate shall be:	$0.58869/Ccf	(D)
The current components of the minimum NGV(1) rate are as follows:		
100% load factor base cost of gas:	$0.44533/Ccf	(D)
Incremental operating cost of Company owned NGV compression equipment:	$0.13436/Ccf	
Transition Cost Surcharge	$0.00000/Ccf	
State Tax Adjustment Surcharge	$(0.00100)/Ccf	(I)
Minimum allowable Non-Gas cost	$0.01000/Ccf	
The maximum NGV(1) rate shall be:	$0.88058/Ccf	(D)
The current components of the maximum NGV(1) rate are as follows:		
Tailblock rate of the Commercial and Public Authority Service Rate schedule:	$0.74772/Ccf	(D)
Incremental operating cost of Company owned NGV compression equipment:	$0.13436/Ccf	
State Tax Adjustment Surcharge	$(0.00150)/Ccf	(I)

NGV(2) Natural gas vehicle customers utilizing customer owned filling facilities. A uniform rate will be established each month within the parameters set forth above, to customers utilizing customer owned filling facilities.

The minimum NGV(2) rate shall be:	$0.45456/Ccf	(D)
The current components of the minimum NGV(2) rate are as follows:		
100% load factor base cost of gas:	$0.44533/Ccf	(D)
Transition Cost Surcharge	$0.00000/Ccf	
State Tax Adjustment Surcharge	$(0.00077)/Ccf	(I)
Minimum allowable Non-Gas cost	$0.01000/Ccf	
The maximum NGV(2) rate shall be:	$0.74645/Ccf	(D)

(D) Indicates Decrease (I) Indicates Increase

The current components of the maximum NGV(2) rate are as follows:

Tailblock rate of the Commercial and Public Authority Service Rate schedule:	$0.74772/Ccf	(D)
State Tax Adjustment Surcharge	$(0.00127)/Ccf	(I)

V. SURCHARGE

All non-purchased gas cost charges under this rate schedule will be subject to surcharges in accordance with provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge as set forth in this tariff.

VI. AMOUNTS TO BE INCLUDED IN OVER/UNDERCOLLECTION OF GAS COSTS

Purchased gas cost revenues billed under this rate schedule shall be included as revenues for recovery of gas costs for purposes of computing Factor "E" of Company's 1307(f) rate in accordance with procedures set forth in Rider "A" - section 1307(f) Purchased Gas Costs. Purchased gas cost revenues recovered under this rate schedule shall be the 100% load factor base cost of gas as defined above.

VII. RULES AND REGULATIONS

The rules and regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

(D) Indicates Decrease (I)Indicates Increase

RESERVED FOR FUTURE USE

RATE SCHEDULE BP

SERVICE FOR CUSTOMERS WITH BYPASS FACILITIES

PURPOSE

Bypass customers are required to make reasonable payments toward the recovery by the Company of its fixed costs of service in relation to their use of the Company's system during winter periods. Bypass customers are required to pay over a one-year period approximately the same amount that typical non-bypass customers using the same level of winter service would pay. These bypass customers are required to make these payments so that they pay their fair share of system costs in relationship to their usage, and so that other non-bypass customers are not burdened.

This rate schedule requires also that bypass customers operate in a manner that will not jeopardize service to other customers.

APPLICABILITY

Throughout the territory served under this tariff.

Service under this rate schedule is available to all customers served under Commercial and Public Authority ("C-PA") Service Rate Schedule, Small Volume Industrial Service ("SVIS") Rate Schedule, Intermediate Volume Industrial Service ("IVIS") Rate Schedule, Rate Schedule LVIS or Rate Schedule LIS that have installed facilities which would enable the Customer to receive volumes of gas purchased from or transported by an entity other than the Company, without using the Company's distribution system ("Bypass Facilities"); provided, however, that this Rate Schedule shall not apply to "Self-Help" gas.

"Self-Help" gas refers to gas produced by the customer from gas reserves and wells owned by the customer on a tract of land owned by the customer that is contiguous to the tract of land on which the customer's manufacturing plant is located.

SERVICE AGREEMENT

The Customer must execute a service agreement for one or more twelve-month contract terms terminating at the completion of the last billing cycle ending in November of each year. The Service Agreement shall specify the level of system service, during thirty-day periods, that the customer desires to have available on the Company's distribution system. Such level of service shall be specified in the form of a volume of gas, expressed in Mcf, that the Customer wishes to be able to have the right to purchase from the Company or transport through the Company's facilities during thirty-day periods. Such volume shall be subject to adjustment as explained in the Special Provisions section of this rate schedule.

METERING AND FLOW CONTROL EQUIPMENT

The Company may install at the premises of any customer under this rate schedule an automated meter reading device (AMD) and communications device, at customers expense, which will enable the Company to monitor and record each Bypass Customer's daily usage. In addition, if changes in levels of usage of gas from the Company by any Customer under this rate schedule would have the potential to adversely affect service to others customers, the Company may install flow control devices, at customers expense, to restrict the daily flow of gas to the Customer to approximately one-thirtieth (1/30) of the monthly Bypass nomination.

NATURE OF SERVICE

A nomination under this rate schedule shall permit the customer to use the Company's facilities on a firm basis subject to curtailment priorities of Rule 26 of this Tariff. The gas may be either customer-owned gas or Company-owned gas. If the gas is customer-owned, the customer must have contracted with the Company for transportation service under the rate schedule for Transportation Service. If the gas is Company-owned, the customer must have contracted with the Company for standby service under Rate Schedule SB. If the customer is categorized as a residential or firm critical commercial essential human needs customer, then the customer must contract with the Company under rate schedule PSB.

MONTHLY BILLS

The procedures set forth below require bypass customers to pay over a twelve-month period revenues for recovery of non-gas costs of service approximately equal to amounts paid by average non-bypass customers with similar peak month winter usage. The procedures below require a bypass customer to pay over a twelve-month period based on its peak winter monthly usage multiplied by an average monthly load factor for non-bypass customers. The applicable rate is applied to the resulting volume. The procedures also reduce volumes subject to this rate schedule to credit a bypass customer for actual throughput to which the Company's sales or transportation service rates are applied.

RATE

Customers under this rate schedule shall be subject to the applicable rate listed below to be applied to the Billing Volume, as defined below.

For customers receiving service under	Bypass rate	
Commercial/Public Authority Rate Schedule	$1.3286 per Mcf	(I)
Rate Schedule SVIS	$1.0440 per Mcf	(I)
Rate Schedule IVIS	$1.0471 per Mcf	(I)
Rate Schedule LVIS	$0.7559 per Mcf	(I)
Rate Schedule LIS	$0.2664 per Mcf	(I)

(I) Indicates Increase

MONTHLY VOLUME

The Monthly Volume shall be the volume of gas specified in the Service Agreement under this rate schedule or as adjusted under the Special Provisions section of this rate schedule, as adjusted for the number of days in the billing cycle. In order to adjust the volume of gas specified in the Service Agreement under this rate schedule or as adjusted under the Special Provisions section of this rate schedule for the number of days in a billing cycle, such volume of gas shall be multiplied by a fraction. The numerator of the fraction shall be the number of days in the billing cycle and the denominator shall be thirty (30).

APPLICATION TERM

In this rate schedule, the phrase "Application Term" shall be each twelve-month period terminating at the completion of the last billing cycle ending in November of each year.

BILLING VOLUME

For each billing month, if the volume of gas delivered to the customer from the Company, including both gas purchased by the customer from the Company and gas transported by the Company exceeded 50.00 percent of the Monthly Volume, as adjusted in the manner explained above for the number of days in the billing cycle, then the Billing Volume for service under this rate schedule shall be zero (0) Mcf.

For each billing cycle, if the volume of gas delivered to the customer by the Company, including both gas purchased by the customer from the Company and gas transported by the Company, was less than 50.00 percent of the Monthly Volume, as adjusted in the manner explained above for the number of days in the billing cycle and if the volume determined under item 1, below, is greater than or equal to the volume determined under item 2, below, then the Billing Volume for service under this Rate Schedule shall be zero (0) Mcf.

For each billing month, if the volume of gas delivered to the customer by the Company, including both gas purchased by the customer from the Company and gas transported by the Company, was less than 50.00 percent of the Monthly Volume, as adjusted in the manner explained above for the number of days in the billing cycle and if the volume determined under item 1, below, is less than the volume determined under item 2, below, then the Billing Volume for service under this rate schedule shall be the difference between the volume determined under item 1, below, and the volume determined under item 2, below.

1. The total volume of gas delivered to the customer by the Company, including both Company-owned gas sold to the customer and customer-owned gas transported by the Company, during the period commencing at the beginning of the current Application Term through the completion of the billing cycle for which the Billing Volume is being determined

BILLING VOLUME(Cont'd)

shall be added to the total Mcf volume billed to the customer under this rate schedule for service during the period commencing at the beginning of the current Application Term through the completion of the billing cycle immediately prior to the billing cycle for which the Billing Volume is being determined.

2. a. The Monthly Volume shall be multiplied by a fraction. The numerator of the fraction shall be 365 and the denominator shall be 30.

b. The product of item 2.a. shall be multiplied by 50.00 percent.

c. For each billing cycle during the Application Term, the product of item 2.b., above, shall be multiplied by a fraction. The numerator of the fraction shall be the number of billing cycles during the Application Term that have completed (including the billing cycle for which the Billing Volume is being determined) and the denominator shall be twelve (12).

SPECIAL CREDIT

If the sum of: (1) the total Mcf volume of gas delivered to the Customer by the Company, including both volumes of Company-owned gas sold to the Customer and Customer-owned gas transported by the Company, during an Application Term and (2) the Mcf volume of service under this rate schedule during such Application Term, exceeds the applicable volume determined below, then the Customer shall receive a credit. Such credit will be equal to the applicable rate for service under this rate schedule multiplied by the lesser of:

1. The Mcf volume of service to the Customer under this rate schedule during the Application Term or

2. The difference between:

a. the sum of: (1) the total Mcf volume of gas delivered to the Customer by the Company, including both volumes of Company-owned gas sold to the Customer and Customer-owned gas transported by the Company, during the Application Term and (2) the Mcf volume of service under this rate schedule during such Application Term and

b. the applicable volume computed as set forth below.

For Customers under this rate schedule, the applicable volume, for each Application Term shall be determined under items 1 and 2, below:

1. The volume of gas specified in the Service Agreement under this rate schedule or as adjusted under the Special Provisions section of this

SPECIAL CREDIT (Cont'd)

rate schedule as in effect at the end of the Application Term shall be multiplied by a fraction. The numerator of the fraction shall be 365 and the denominator shall be 30.

2. The product of item 1, above, shall be multiplied by the factor of 0.5000.

ANNUAL MAXIMUM BILL

The Annual Maximum Bill for recovery of non-gas costs of service applies to any customer which provides to the Company accurate and verifiable information concerning the volume of gas taken by the Customer through bypass facilities during a twelve-month Application Term. The Annual Maximum Bill for recovery of non-gas costs of service shall be the sum of: (1) the sum of all basic service charges and administrative rates applicable for service during the Application Term and (2) the product of Distribution's rate for transportation of Pennsylvania gas applicable to the customer multiplied times the total volume of gas used by the bypass customer, including both the volume of gas actually taken from the Company and the volume of bypass gas taken during the Application Term under Rate Schedule BP.

The Annual Bill shall apply only to the portion of rates for recovery of non-gas costs of service and shall not affect the portion of rates for sales of gas by the Company or rates under Rate Schedule SB (for Standby Service) or rates under Rate Schedule PSB (for Priority Standby Service) for recovery of purchased gas costs under Rider A of this tariff.

BILLING

The Company shall include the bill for service under this rate schedule together with the bill for service under all other rate schedules. For each billing cycle, payment for service under this rate schedule shall become due simultaneously with the payment for service under all other rate schedules.

SPECIAL PROVISIONS

1. If the sum of purchases by a Customer from the Company and transportation deliveries by the Company to a Customer, during any billing cycle that ends in any December, January, February or March, exceeds the level of service, expressed in Mcf, set forth in the Service Agreement, as adjusted for the number of days in such billing cycle, then the level of service that is

SPECIAL PROVISIONS (Cont'd)

set forth in the Service Agreement shall be adjusted to equal the volume of gas actually purchased from, and transported by, the Company during such billing cycle adjusted to a 30 day billing cycle by multiplying such volume by a fraction. The numerator of the fraction shall be thirty (30) and the denominator shall be the number of days in the billing cycle.

If the level of service specified in the Service Agreement is adjusted under this Special Provision, then the Service Agreement shall continue to be effective and the Service Agreement shall be interpreted to specify the level of service as adjusted under this Special Provision, unless such volume of gas and term of the Service Agreement are further adjusted in accordance with this Special Provision. Such level of service, as adjusted under this Special Provision, shall continue to be effective for the remainder of the Service Agreement.

2. If a Customer served under the Commercial/Public Authority Rate Schedule, Rate Schedule SVIS, Rate Schedule IVIS, Rate Schedule LVIS or Rate Schedule LIS, that has Bypass Facilities installed, declines to enter into a Service Agreement for service under this rate schedule but either purchases gas from the Company or transports gas through the Company's facilities, such purchase of gas from the Company or transportation of gas by the Company shall be deemed to be the execution by the Customer of a Service Agreement under this rate schedule with a term of one Application Term and the level of service under such Service Agreement shall be the volume of gas purchased or transported for the Customer from the Company during such billing cycle, adjusted to a 30 day billing cycle. In order to adjust the level of service to a 30 day billing cycle the volume of gas actually purchased from and transported by the Company during such billing cycle shall be multiplied by a fraction. The numerator of the fraction shall be thirty (30) and the denominator shall be the number of days in the billing cycle.

MAXIMUM SAFE OPERATING VOLUME

If substantial changes by the Customer in levels of usage of gas from the Company may adversely affect service to other customers and if the Company has not installed flow control devices at the Customer's premises, the Company may establish for that Customer a Maximum Safe Operating Volume ("MSOV"). The MSOV will be the maximum daily volume that the customer can take from the Company without jeopardizing service to other customers. The MSOV will be based upon an engineering study to be performed by the Company of the Company's facilities, the Customer's actual and potential load characteristics, other customers and their respective loads and the sources of supply in the vicinity of the Customer. Upon completion of the engineering study and determination of the applicable MSOV, the Company will inform the Customer of the MSOV applicable to it. Thereafter, the Customer may not use more than the MSOV of gas from the Company during any day without giving the Company at least one complete business days notice of its increased level of usage of gas from the Company. If the Customer uses in any day more than the applicable MSOV, the Customer shall pay to the Company, in addition to all other applicable charges, a penalty of $25 per Mcf of gas taken from the Company in excess of the MSOV.

DAY

As used in this Rate Schedule, the word "day" shall mean a consecutive twenty four hour period commencing at 10:00 a.m. on each calendar day. (C)

LIMITATION OF SERVICE

For any commercial, public authority, SVIS, IVIS, LVIS or LIS Customer that has installed Bypass Facilities, the Company maintains no duty to allow the Customer either to purchase gas from the Company or to transport gas through the Company's facilities in excess of the level of service, expressed in Mcf in the Service Agreement under this rate schedule, as adjusted in the manner set forth hereinabove under this rate schedule.

(C) Indicates Change

CONTRACT TERM

The initial term of the Service Agreement shall be for at least one Application Term. After the initial Application or any renewal thereof, the Service Agreement shall be renewed automatically for successive one-year Application Terms thereafter unless the Customer or the Company terminates the Service Agreement by written notice thereof to the other more than sixty (60) days prior to the end of a term. If the Service Agreement is renewed automatically pursuant to the provisions of this paragraph, then the volume of gas specified in the renewed Service Agreement shall be established at the volumetric level in effect, as adjusted in accordance with Special Provision 1 or 2 of this rate schedule, immediately prior to the effective date of the renewed Service Agreement. The Company may terminate a Service Agreement at an earlier date as provided by law or by any provision of this tariff.

In addition, a Service Agreement may be terminated at the request of a Customer for a new Service Agreement specifying a greater level of service, and such request will by honored by the Company, subject to the availability of sufficient capacity for such service in those portions of the Company's system so affected. A Customer may also request, upon sixty (60) days written notice to the Company prior to the end of a contract term, a new Service Agreement specifying a reduced level of service, and such request will be honored by the Company; provided that the requested reduced level of service is not less than the level of service, if any, for the Customer under Rate Schedule SB or Rate Schedule PSB.

Irrespective of the foregoing, any request by a Customer, for a reduction in the level of service under this rate schedule or for termination of service under this rate schedule effective at the end of any contract term, shall be deemed to have been denied and of no effect if, after such request, the term of the Service Agreement is continued under the Special Provisions of this rate schedule.

RULES AND REGULATIONS

The rules and regulations set forth in this tariff shall govern, where applicable, service under this rate schedule.

RATE SCHEDULE PSB

PRIORITY STANDBY SERVICE

APPLICABILITY

Throughout the territory served under this tariff.

AVAILABILITY OF SERVICE

Service under this rate schedule is available to all customers under the Residential, Commercial and Public Authority, and SVIS Rate Schedules which enter into a contract for service under this Rate Schedule. A customer will be permitted to enter into a contract, prepared by the Company, for service under this rate schedule, however, only if the Company projects that sufficient volumes of gas will be available to the Company during the period of the customer’s contract for Priority Standby Service.

Service under this rate schedule is mandatory for all customers categorized as Priority 1 under the curtailment priorities of Rule 26 who enter into contracts with the Company to receive Transportation Service and who do not have dual or alternate fuel equipment on site which is installed and operable with sufficient amounts of alternate fuel available on site during each winter period of each year commencing on December 1 and ending on March 31 of the following year. Service under this rate schedule is voluntary for all other customers.

NATURE OF SERVICE

Priority standby service shall permit the customer to purchase gas on a firm basis subject to curtailment priorities of Rule 26. The Company will take all reasonable steps to obtain or to maintain gas supplies sufficient to enable the Company to provide reasonably continuous service to each Customer receiving Priority Standby Service.

MONTHLY RATE

The monthly rate shall be $1.2745 per Mcf, which shall be applied to the total monthly volumes transported by the customer during the month. (I)

The rate shall equal the PGDC portion of the commodity rate applicable to the corresponding sales rate classification.

RATE SCHEDULE SB
STANDBY SERVICE

APPLICABILITY

Throughout the territory served under this tariff.

AVAILABILITY OF SERVICE

Service under this rate schedule is available to all customers under the Residential, Commercial & Public Authority, SVIS, IVIS, LVIS, and LIS Rate Schedules that meet the following criteria:

1. The customer has executed a service agreement for a term of at least one year. The Service Agreement shall specify the level of service during thirty-day periods that the customer desires to be able to purchase from the Company. Such level of service shall be specified in the form of a volume of gas, expressed in Mcf, that the Customer wishes to be able to purchase from the Company during thirty-day periods. Such volumes shall be subject to adjustment as explained in the Adjustment section of this rate schedule.

2. The customer either (a) receives volumes of gas transported by the Company or (b) is an LVIS or LIS Customer and has facilities which enable the customer to obtain volumes of gas without using the Company's distribution system ("Bypass Facilities"); and

3. The customer is not categorized as Priority 1 under the curtailment priorities of Rule 26.

In addition, irrespective of the foregoing, Special Provisions 3 through 5, below, shall apply to all transportation customers except those receiving service under Rate Schedule PSB.

NATURE OF SERVICE

Standby service shall permit the customer to purchase gas on a firm basis subject to curtailment priorities of Rule 26. The Company will take all reasonable steps to obtain or to maintain gas supplies sufficient to enable the Company to provide reasonably continuous service to each Customer receiving standby service at the level specified in the Service Agreement, as adjusted from time to time in accordance with the provisions of this rate schedule. Service under this Rate Schedule shall be available only if the Company projects that sufficient volumes of gas will be available to the Company during the period of the contract to provide the level of service desired by the Customer, without affecting adversely the reliability of service to the Company's existing customers receiving firm gas service.

ADJUSTMENT

For each billing cycle, the volume of gas specified in the Service Agreement shall be adjusted to reflect the number of days in such billing cycle by multiplying such volume, expressed in Mcf, by a fraction. The numerator of the fraction shall be the number of days in the billing cycle applicable to the Customer and the denominator shall be 30.

MONTHLY RATE

The monthly rate shall be $0.5980 per Mcf, which shall be applied to the Monthly Volume, as defined below. (I)

MONTHLY VOLUME

The Mcf volume of gas to which the Monthly Rate set forth above shall be applied, shall be determined for each billing cycle, as set forth below;

1. The volume of gas specified in the Service Agreement under this rate schedule shall be adjusted for each billing cycle by, multiplying such volume, expressed in Mcf, by a fraction. The numerator of the fraction shall be the number of days in the billing cycle applicable to the customer and the denominator shall be thirty (30).

2. If the volume determined under item 1, above, is greater than the sum of the Mcf volume of gas purchased by the customer under rate schedules other than load balancing rate schedules during the billing cycle, the Monthly Rate shall be applied to the difference between: (a) the volume determined under item 1, above, and (b) the Mcf volume of gas purchased by the customer under the rate schedules other than load balancing rate schedules during such billing cycle.

3. If the volume determined under item 1, above, is equal to or less than the Mcf volume of gas purchased by the customer under rate schedules other than load balancing rate schedules during the billing cycle, then the Monthly Volume shall be zero (0) Mcf.

SPECIAL PROVISIONS

1. A customer that has Bypass Facilities and that desires service under this rate schedule must enter into an Agreement for Service under Rate Schedule BP that specifies a volume of gas equal to, or greater than, the volume of gas specified in the Service Agreement under this rate schedule.

2. As used in this Rate schedule, the term “Bypass Facilities” does not include facilities that enable a customer to obtain “Self-Help” gas.

   “Self-Help” gas refers to gas produced by the customer from gas reserves and wells owned by the customer on a tract of land owned by the customer that is contiguous to the tract of land in which the customer’s manufacturing plant facilities are located.

3. SB customers shall be subject to a surcharge equal to 25 percent of the retail rates of the applicable sales rate schedule to volumes purchased by transportation customers (in excess of volumes contracted for under Rate Schedule SB) during the billing month ending in December, January, February or March and a surcharge equal to 10 percent of the retail rates of the applicable sales rate schedule to volumes purchased by transportation customers (in excess of volumes contracted for under Rate Schedule SB) during the remaining billing months when overruns by transportation customers are authorized by Company. The rates for sales of gas shall include the Distribution Charges, Gas Adjustment Charge, and the Natural Gas Supply Charge under the sales rate schedule that applies to the customer and the applicable surcharge percentage set forth above. In months when the sum of the Natural Gas Supply Charge and the Gas Adjustment Charge is less than the MMI, the applicable sales rate shall be equal to the sum of the Distribution Charges, the MMI plus all transportation costs to the Company’s City Gate, and the applicable surcharge percentage applied to this rate.

4. SB Transportation MMT customers shall be subject to a penalty of Charges for Daily City Gate Underdeliveries applicable to MMNGS Suppliers plus the higher of $25 per Dth or the DMI for that day plus all transportation costs to the Company’s City Gate when Company has announced that overrun service is not available. (C)

   SB Transportation DMT customers shall be charged the higher of: (1) the rate determined in item 3 above or (2) the Charges for Daily City Gate Underdeliveries applicable to MMNGS Suppliers plus the higher of $25 per Dth or the DMI for that day plus all transportation costs to the Company’s City Gate when Company has issued an OFO that includes a Restriction on Access to Daily Metered Imbalances or announced that overrun service is not available. (C)

(C) Indicates Change

5. Revenues for recovery of purchased gas costs and surcharges under items 3 and 4 above, shall be flowed through to sales customers under Rider "A" of this tariff.

LIMITATION OF SERVICE

For any customer that either (a) has contracted with the Company for transportation service, or (b) is a customer with installed Bypass Facilities, the Company maintains no duty to provide retail service to customer in excess of the level of service, expressed in Mcf in the Service Agreement under this schedule, as adjusted in the manner set forth hereinabove under this rate schedule.

CONTRACT TERM

The initial term of the Service Agreement shall be for at least one year. After the initial term, the Service Agreement shall be renewed automatically for successive one-year terms thereafter unless the customer or the Company terminates the Service Agreement by written notice thereof to the other more than sixty (60) days prior to the end of a term. If the Service Agreement is renewed automatically pursuant to the provisions of this paragraph, then the volume of gas specified in the renewed Service Agreement shall be established at the volumetric level in effect immediately prior to the effective date of the renewed Service Agreement. The Company may terminate a Service Agreement at an earlier date as provided by law or by any provision of this tariff.

In addition, a Service Agreement may be terminated at the request of a customer for a new Service Agreement specifying a greater level of service, and such request will be honored by the Company, subject to the Availability section of this rate schedule and subject to Special Provision 1 of this rate schedule. A customer may also request, upon sixty (60) days written notice to the Company prior to the end of a contract term, a new Service Agreement specifying a reduced level of service, and such request will be honored by the Company, subject to the Availability section of this rate schedule.

RATE SCHEDULE FOR MONTHLY METERED TRANSPORTATION SERVICE

DEFINITIONS

(1) Gas Service Customer - A Gas Service Customer is an entity that is attached to the Company's lines and uses gas in its operations or in its premises;
(2) MMT - Monthly Metered Transportation
(3) MMT Customer – A Gas Service Customer that receives transportation service from the Company under this rate schedule and receives gas supply from a Monthly Metered Natural Gas Supplier. (C) (C)
(4) MMNGS Supplier – Monthly Metered Natural Gas Supplier – A customer or Natural Gas Supplier that qualifies under the Monthly Metered Natural Gas Supplier Rate Schedule and is responsible for the delivery requirements and imbalance resolution of MMT Customers. (C)

AVAILABILITY OF SERVICE

If all of the qualifications (a) through (e) set forth below are met, any entity will be considered an MMT Customer under this Rate Schedule.

(a) The entity that will receive gas transported by the Company (1) has a volumetric requirement of at least 5,000 Mcf per year or (2) belongs to a buyer group of no more than ten customers whose combined usage is at least 5,000 Mcf per year, provided, however, that larger buyer groups shall be permitted upon the mutual agreement of the Company and the customers;

(b) An MMT customer consent to enrollment by an MMNGS supplier shall be accepted in lieu of a transportation service agreement. (C)

(c) The MMT Customer has obtained, or has agreed to obtain, a supply of gas from a qualified MMNGS Supplier; (C)

(d) The MMT Customer has made, or caused to be made, arrangements by which such volumes of gas can be delivered, either directly or by displacement, on a firm basis throughput the entire route from the point of production into the Company’s distribution system throughout the term of the transportation service agreement; and

(e) If facilities are required for furnishing of MMT service, in addition to facilities that are required for furnishing of gas service to a MMT Customer, the MMT Customer shall have paid, in full, for any additional facilities required to be constructed for furnishing of MMT service, which payment shall not

(C) Indicates Change

be subject to refund under any circumstances. If additional facilities are required for furnishing of gas service, customer's payment for additional facilities required for furnishing of gas service shall be governed by Tariff Rule No. 3, "Extension of Facilities", and Tariff Rule No. 5, "Service Lines."

CHARACTER OF SERVICE

Gas, of a quality acceptable to the Company, owned by a MMT Customer and delivered, either directly or by displacement, into the Company's distribution system by a qualified MMNGS Supplier, will be transported, by the Company, to the delivery point designated by the MMT Customer. Receipt of natural gas for the customer at the Company City Gate may be limited to the customer’s DDQ as established in Rate Schedule MMNGS. If the Customer meets the qualifications for service in the Availability section of this Rate Schedule, prior service under the superseded Rate Schedule for Transportation Service will be converted to service under this Rate Schedule unless the Company is notified by the Customer that it prefers service under the Rate Schedule for Daily Metered Transportation Service. (C)

(C)

(C) Indicates Change

RATE SCHEDULE FOR MONTHLY METERED TRANSPORTATION SCHEDULE (cont'd)

MONTHLY RATES

Commodity Rates

The commodity rates set forth below contain a component, presently $0.4900 per Mcf, for recovery of purchased gas costs. (I)

For transportation of gas to Residential Customers, the monthly rate for transportation of gas both within and outside the Commonwealth of Pennsylvania shall be:

$3.4511 Mcf (I)

For transportation of gas to Commercial and Public Authority Customers, the monthly rate for transportation of gas produced within the Commonwealth of Pennsylvania shall be:

$2.7894 per Mcf for Small Commercial/Public Authority using not more than 250 Mcf per year (I)
$2.5455 per Mcf for Small Commercial/Public Authority using greater than 250 Mcf but not more than 1,000 Mcf per year (I)
$2.1522 per Mcf for Large Commercial/Public Authority (I)

For transportation of gas to Commercial and Public Authority Customers, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:

$2.7894 per Mcf for Small Commercial/Public Authority using not more than 250 Mcf per year (I)
$2.5455 per Mcf for Small Commercial/Public Authority using greater than 250 Mcf but not more than 1,000 Mcf per year (I)
$2.1522 per Mcf for Large Commercial/Public Authority (I)

For transportation of gas to Small Volume Industrial Customers, the monthly rate for transportation of gas produced within the Commonwealth of Pennsylvania shall be:

$2.5622 per Mcf for SVIS Customers (I)

For transportation of gas to Small Volume Industrial Customers, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:

$2.5622 per Mcf for SVIS Customers (I)

RATE SCHEDULE FOR MONTHLY METERED TRANSPORTATION SCHEDULE (cont'd)

For transportation of gas to Intermediate Volume Industrial Customers, the monthly rate for transportation of gas produced within the Commonwealth of Pennsylvania shall be: (I)
$1.8247 per Mcf for IVIS Customers

For transportation of gas to Intermediate Volume Industrial Customers, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:

$1.8247 per Mcf for IVIS Customers (I)

For transportation of gas to Large Volume Industrial Customers and any entity that is not a Gas Service Customer, the monthly rate for transportation of gas produced within the Commonwealth of Pennsylvania shall be:

$1.5143 per Mcf (I)

For transportation of gas to Large Volume Industrial Customers and any entity that is not a Gas Service Customer, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:

$1.5143 per Mcf (I)

For transportation of gas to Large Industrial Customers, the monthly rate for transportation of gas produced within the Commonwealth of Pennsylvania shall be:

$1.8093 per Mcf (I)

For transportation of gas to Large Industrial Customers, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:

$1.8093 per Mcf (I)

Provided, however, that the Company, in its sole discretion, may reduce by contract the portion of the above rates applicable to the Customer that are for recovery of gas or the portion of the rate for recovery of non-gas costs of service if it is reasonably necessary to do so to meet competition from another supplier of energy including gas from another supplier of gas that has constructed, or could construct, facilities to deliver supplies of gas to a MMT Customer of the Company without use of the Company's facilities or another transportation of gas. The Company may also reduce or eliminate the compensation for line losses provided for in Special Provisions paragraph B of this rate schedule in order to meet the competitive circumstances for alternate fuels or bypass situations cited above excluding competition from other Pennsylvania local distribution companies. The Company will reduce the applicable rate only if:

(a) Either (1) the MMT Customer has facilities in place and operable to use an alternative fuel or obtain gas from an alternative supplier or (2) in the Company's judgment, such facilities would be constructed;

(D) Indicates Decrease (I) Indicates Increase

RATE SCHEDULE FOR MONTHLY METERED TRANSPORTATION SERVICE (cont.)

(b) Volumes of gas that would be transported by the Company would be displaced by an alternate fuel or an alternative source of gas unless the Company reduces its transportation rate;

(c) The Company will not reduce the rate for transportation service below the level necessary to transport gas; and

(d) In the Company's judgment the MMT Customer has taken all reasonable steps to minimize the cost of gas supplies delivered to the Company's system in order to help meet competition.

Where the above criteria are met, the Company may, in its discretion enter into an agreement setting either: (1) a fixed transportation rate or (2) the basis for determining the transportation rate, for the period of the Service Agreement, which will specify which portion of the rate is being reduced.

If an MMT Customer is a member of a buyer group, bills for each member of a buyer group will be determined individually. Volumes of transportation service in a billing period will be allocated among members of a buyer group pursuant to the Service Agreement.

Volumes delivered as transportation service pursuant to this rate schedule shall be subject to State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge (C)

Residential rates shall be subject to surcharges in accordance with Rider F - CAP Discount Charge as set forth in this tariff.

CHARGES FOR TRANSPORTATION BY OTHERS

If furnishing service, pursuant to this Rate Schedule, requires the use of a transportation service provided other than by the Company, any cost incurred by the Company, with regard thereto, shall be billed to MMT Customer by the Company.

CHARGES UNDER OTHER RATE SCHEDULES

The MMT Customer receiving gas transported by the Company under this Rate Schedule shall pay all charges under all other applicable rate schedules and riders, irrespective of whether such MMT Customer, in any billing period receives only gas transported by the Company, and such MMT Customer shall pay rates under all other applicable rate schedules for any service furnished to the MMT Customer in addition to transportation service under this Rate Schedule.

(C) Indicates Change

MAXIMUM DAILY QUANTITY

The "Maximum Daily Quantity" shall be the maximum volume of gas, (C)
expressed in Mcf, that is equal to a Customer’s Daily Delivery Quantity as (C)
determined pursuant to Rate Schedule MMNGS, Special Provision D.1 on Page No. 118C, may be delivered into the Company's distribution system, during any twenty-four hour period, for transportation by the Company to such Customer as transportation service under this rate schedule. The Company, in its sole discretion and upon request of a MMT Customer, may agree to receive and to transport, during any twenty-four hour period, a volume in excess of the (C)
Maximum Daily Quantity. During any hour of any twenty-four hour period, the Company shall not be required to receive and to transport more than 1/24 of the (C)
Maximum Daily Quantity.
(C)

(C) Indicates Change

(C)

RESERVED FOR FUTURE USE

(C) Indicates Change

BILLING

Monthly charges, for transportation service pursuant to this rate schedule, are subject to the Late Payment Charges set forth in Section 16 of the Rules and Regulations of this tariff.

SPECIAL PROVISIONS

A. The volume of gas delivered into the Company's distribution system, on any day in behalf of MMT Customers for transportation service pursuant to this Rate Schedule, shall be determined by meters and as provided in B, below.

B. To compensate for line losses, the volume of gas delivered into the Company's distribution system, shall be retained by the Company as set forth in Rate Schedule MMNGS Special Provision C, Page No 118B; provided however, that, where the only facilities involved in transporting gas to the MMT Customer are meters, meter installations, house regulators, house regulator installations and industrial measuring station equipment, no amount shall be deducted as compensation for line losses.

C. Service under this Rate Schedule may be interrupted during periods of supply shortages but only based upon the schedule of priority of curtailment set forth in section 26 of the Rules and Regulations of this tariff. (C)

D. Transportation service under this Rate Schedule may be interrupted or curtailed whenever, in the event of a sudden and unforeseen supply deficiency, the Company invokes emergency curtailment provisions under Tariff Rule 26. (C)

(C) Indicates Change

E. In the event of interruption or curtailment of transportation service, pursuant to items C and D, above, and during such period of interruption or curtailment, the MMT Customer must sell to the Company all or a portion of the MMT Customer's supply of gas at the higher of (1) the Transportation Service Customer's cost of purchased gas at the point of delivery to the Company or (2) the Company's average cost of purchased gas per Mcf, as determined based upon the Company's Section 1307(f) Rate, which is $5.4664. (D)

F. If for any reason (including the default of an MMNGS Supplier), the MMNGS Supplier fails to provide sufficient daily deliveries of natural gas supplies to meet the MMT Customers DDQ pursuant to the terms of MMNGS supply service, and/or MMT Customer's MMNGS Supplier does not provide complete compensation to the Company for services provided under Rate Schedule MMNGS, Special Provision D.3, the Company shall charge the MMT Customer for the deficient daily deliveries under the applicable gas sales rate schedule plus applicable surcharge as set forth in Rate Schedule SB Special Provisions.

G. Service under this rate schedule shall be available only to the extent that there is sufficient capacity for such service in those portions of the Company's system affected by providing of transportation service including but not limited to, that portion of the Company's system where gas is delivered to the Company and that portion of the Company's system where gas is delivered to the MMT Customer. In determining the Company's ability to provide transportation service, sufficient capacity in the Company's system shall be assumed. If service shall not be supplied, based upon insufficient capacity, the burden shall be on the Company to prove such capacity limitation. (C)

H. Where gas is received by the Company for transportation service pursuant to this Rate Schedule, title to such gas shall remain vested in the MMT Customer for which such gas was received for transportation. The Company's furnishing transportation service for a MMT Customer shall be complete upon delivery of gas received for transportation service, except as provided in E and F, above. (C)

I. The Company shall not be liable, under any circumstances or in any respect, to a Gas Service Customer, MMT Customer, Natural Gas Supplier, a producer of gas or any other person or entity for damages arising either directly or indirectly from interruption, curtailment or termination of transportation service. (C)

J. Revenue for recovery of purchased gas costs under Rider "A" shall include the product of the portions of the rates under this Rate Schedule for recovery of purchased gas costs times the volumes billed under such rates; provided, however, that any adjustment to rates under this Rate Schedule pursuant to Special Provision K., below, shall be eliminated from rates used to calculate revenues for recovery of purchased gas costs under this Rate Schedule. (C)

(C) Indicates Change

K. Rates under this Rate Schedule will be recomputed in, inter alia, each of the Company's annual proceeding under Section 1307(f) of the Public Utility Code.

L. Customers who elect transportation service under this Rate Schedule shall have the right thereafter to purchase gas from the Company only to the extent that they have contracted for firm service under Rate Schedule SB for Standby Service or under Rate Schedule PSB for Priority Standby Service. Purchases of gas from the Company by MMT Customers who have not contracted for service under Rate Schedule PSB shall be subject to both the charges under the applicable sales rate schedule and all provisions of the Rate Schedule SB, including the Special Provisions, for a period of 12 months to the extent such customers continue to purchase gas from the Company.

M. Customers who elect to schedule their own gas supplies via Company’s internet accessible Transportation Scheduling System and/or wish to access and/or obtain each day meter readings of the volume of gas delivered to the Company for the Customer's account and the volume of gas from the Company used by the Customer each day shall execute a Data Security Agreement pursuant to Tariff Rule 33. (C)

(C) Indicates Change

RATE SCHEDULE FOR DAILY METERED TRANSPORTATION SERVICE

DEFINITIONS

(1) Gas Service Customer - A Gas Service Customer is an entity that is attached to the Company's lines and uses gas in its operations or in its premises;
(2) DMT - Daily Metered Transportation
(3) DMT Service Customer - Any entity that has executed a DMT Service Agreement with the Company for transportation of gas by the Company.

AVAILABILITY OF SERVICE

If all of the qualifications (a) through (e) set forth below are met, any entity will be considered a DMT Service Customer under this Rate Schedule.

(a) The entity that will receive gas transported by the Company (1) has a volumetric requirement of at least 5,000 Mcf per year or (2) belongs to a buyer group of no more than ten customers whose combined usage is at least 5,000 Mcf per year, provided, however, that larger buyer groups shall be permitted upon the mutual agreement of the Company and the customers;

(b) A DMT service agreement must be executed by the DMT Service Customer in the form prepared by the Company (the "Service Agreement");

(c) The DMT Service Customer has obtained, or has agreed to obtain, a supply of gas, of a quality acceptable to the Company, from any source of gas;

(d) The DMT Service Customer has made, or has caused to be made, arrangements by which such volumes of gas can be delivered, either directly or by displacement, on a firm or interruptible basis, into the Company's distribution system; and

(e) If facilities are required for furnishing of DMT service, in addition to facilities that are required for furnishing of gas service, to a Gas Service Customer, the DMT Service Customer shall have paid, in full, for any additional facilities required to be constructed for furnishing of DMT service, which payment shall not

be subject to refund under any circumstances. As deemed necessary by the Company in its sole discretion, the DMT customer shall be required also to pay, in full, for costs of installing daily metering and communications equipment selected by the Company which will enable the Company to obtain each day meter readings of the volume of gas delivered to the Company or to another point or points acceptable to the Company for the Customer's account and the volume of gas from the Company used by the Customer each day. In addition, with regard to daily metering and communications equipment, the Customer shall pay an amount of money to provide for recovery of the present value of the carrying cost of income taxes on the payment for daily metering and communications equipment. Such carrying cost arises from the delay between federal and Pennsylvania income taxation and income tax deductions over the tax life of the equipment and a further amount equal to 72.67% of the carrying cost (based on present income tax rates). If additional facilities are required for furnishing of gas service, customer's payment for additional facilities required for furnishing of gas service shall be governed by Tariff Rule No. 3, "Extension of Facilities", and Tariff Rule No. 5, "Service Lines."

CHARACTER OF SERVICE

Gas, of a quality acceptable to the Company, owned by a DMT Service Customer and delivered, either directly or by displacement, into the Company's distribution system, will be transported, by the Company, to the delivery point designated by the DMT Service Customer.

TERM OF SERVICE AGREEMENT

If the requirements of this Rate Schedule are met, the Company shall offer to enter into a Service Agreement with an initial term of at least one year and successive one-year terms thereafter. The initial term of a Service Agreement may be for less than one year only with the mutual consent of both the DMT Service Customer and the Company. If the initial term of a Service Agreement is for less than one year, successive terms thereafter shall be equal in length to the initial term. Either the DMT Service Customer or the Company may terminate the Service Agreement at the end of a term upon written notice thereof to the other more than thirty (30) days prior to the end of a term; further provided, however, that the Company may terminate a Service Agreement at an earlier date as provided by law by provisions of this Tariff.

(C) Indicates Change

RATE SCEHDULE FOR DAILY METERED TRANSPORTATION SERVICE (cont'd)

MONTHLY RATES

Commodity Rates

For transportation of gas to Residential customers, the monthly rate for transportation of gas both within and outside the Commonwealth of Pennsylvania shall be:

(I)

$2.9611 per Mcf.

For transportation of gas to Commercial and Public Authority Customers, the monthly rate for transportation of gas produced within the Commonwealth of Pennsylvania shall be:

$2.2994 per Mcf	for Small Commercial/Public Authority using not more than 250 Mcf per year	(D)
$2.0555 per Mcf	for Small Commercial/Public Authority using greater than 250 Mcf but not more than 1,000 Mcf per year	(I)
$1.6622 per Mcf	for Large Commercial/Public Authority	(I)

For transportation of gas to Commercial and Public Authority Customers, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:

$2.2994 per Mcf	for Small Commercial/Public Authority using not more than 250 Mcf per Year	(D)
$2.0555 per Mcf	for Small Commercial/Public Authority using greater than 250 Mcf but not more than 1,000 Mcf per year	(I)
$1.6622 per Mcf	for Large Commercial/Public Authority	(I)

For transportation of gas to Small Volume Industrial Customers, the monthly rate for transportation of gas produced within the Commonwealth of Pennsylvania shall be:

$2.0722 per Mcf	for SVIS Customers.	(D)

For transportation of gas to Small Volume Industrial Customers, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:

$2.0722 per Mcf	for SVIS Customers.	(D)

For transportation of gas to Intermediate Volume Industrial Customers, the monthly rate for transportation of gas produced within the Commonwealth of Pennsylvania shall be:

$1.3347 per Mcf	for IVIS Customers.	(I)

RATE SCHEDULE FOR DAILY METERED TRANSPORTATION SERVICE (cont'd)

For transportation of gas to Intermediate Volume Industrial Customers, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:

$1.3347 per Mcf for IVIS Customers. (I)

For transportation of gas to Large Volume Industrial Customers and any entity that is not a Gas Service Customer, the monthly rate for transportation of gas produced within the Commonwealth of Pennsylvania shall be:

$1.0243 per Mcf. (I)

For transportation of gas to Large Volume Industrial Customers and any entity that is not a Gas Service Customer, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:

$1.0243 per Mcf. (I)

For transportation of gas to Large Industrial Customers, the monthly rate for transportation of gas produced within the Commonwealth of Pennsylvania shall be:

$0.5993 per Mcf. (I)

For transportation of gas to Large Industrial Customers, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:

$0.5993 per Mcf. (I)

Provided, however, that the Company, in its sole discretion, may reduce by contract the portion of the above rates applicable to the Customer that is for recovery of gas costs or the portion of the rate for recovery of non-gas costs of service if it is reasonably necessary to do so to meet competition from another supplier of energy including gas from another supplier of gas that has constructed, or could construct, facilities to deliver supplies of gas to a Gas Service Customer of the Company without use of the Company's facilities or another transporter of gas. The Company may also reduce or eliminate the compensation for line losses provided for in Special Provisions paragraph B of this rate schedule in order to meet the competitive circumstances for alternate fuels or bypass situations cited above excluding competition from other Pennsylvania local distribution companies. The Company will reduce the applicable rate only if:

(a) Either (1) the Customer has facilities in place and operable to use an alternative fuel or obtain gas from an alternative supplier or (2) in the Company's judgment, such facilities would be constructed;

RATE SCHEDULE FOR DAILY METERED TRANSPORTATION SERVICE (cont.)

(b) Volumes of gas that would be transported by the Company would be displaced by an alternate fuel or an alternative source of gas unless the Company reduces its transportation rate;

(c) The Company will not reduce the rate for transportation service below the level necessary to transport gas; and

(d) In the Company's judgment the DMT Service Customer has taken all reasonable steps to minimize the cost of gas supplies delivered to the Company's system in order to help meet competition.

Where the above criteria are met, the Company may, in its discretion enter into an agreement setting either: (1) a fixed transportation rate or (2) the basis for determining the transportation rate, for the period of the Service Agreement, which will specify which portion of the rate is being reduced.

If a Gas Service Customer is a member of a buyer group, bills for each member of a buyer group will be determined individually. Volumes of transportation service in a billing period will be allocated among members of a buyer group pursuant to the Service Agreement.

Volumes delivered as transportation service pursuant to this rate schedule shall be subject to State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge. (C)

Residential rates shall be subject to surcharges in accordance with Rider F - CAP Discount Charge as set forth in this tariff.

CHARGES FOR TRANSPORTATION BY OTHERS

If furnishing service, pursuant to this Rate Schedule, requires the use of a transportation service provided other than by the Company, any cost incurred by the Company, with regard thereto, shall be billed to DMT Service Customer by the Company.

CHARGES UNDER OTHER RATE SCHEDULES

The Gas Service Customer receiving gas transported by the Company under this rate schedule shall pay all charges under all other applicable rate schedules and riders, irrespective of whether such Customer, in any billing period, receives only gas transported by the Company, and such Customer shall pay rates under all other applicable rate schedules for any service furnished to the Customer in addition to transportation service under this Rate Schedule.

(C) Indicates Change

CHARGES FOR OVERDELIVERIES

As used in this Rate Schedule, "overdeliveries" shall mean the cumulative amount by which the volume of gas delivered to the Company for the Customer's account, since the commencement of transportation service by the Company for the Customer under any rate schedule, after adjustment for line losses and after elimination of volumes purchased from the Customer by the Company, exceeds the total amount of transportation service volumes taken by the Customer from the Company under any rate schedule since the commencement of transportation service for the Customer by the Company. Such cumulative overdelivery balance shall be computed each day, and the rates set forth below shall be applied to the maximum daily overdelivery volume occurring during the billing month. (I) (I)

If the DMT Service Customer in any billing month has overdeliveries in excess of two percent of the volume of gas transported for the customer in the billing month, the Customer shall be subject to additional charges each billing month. For a maximum daily overdelivery volume up to 37% of the volume of DMT service gas transported to the Customer by the Company in the billing month, the charge for overdeliveries shall be $0.6351 per Mcf in excess of two percent of the volume of gas transported for the customer in the billing month.

For overdeliveries equal to or more than 37% of the volume of DMT service gas transported to the Customer by the Company during the billing month, the charge for such excess overdeliveries shall be $0.7624 per Mcf.

OPERATIONAL FLOW ORDERS

The Company may also issue Operational Flow Orders (“OFOs”) which apply to transportation customers receiving service under this rate schedule as follows:

A Restriction on Access to Daily Metered Imbalances

OFOs may be issued to customers receiving service under this rate schedule to assure that adequate supplies are delivered to the Company. During such period, DMT customers shall not be permitted to use banked gas to cover daily underdeliveries in excess of the 2% tolerance during the term of the OFO. Furthermore, in the event an OFO is issued, metered usage in excess of 102% of confirmed deliveries on behalf of the DMT customer to Distribution’s city gate, less line loss, shall be deemed a sale of gas by the Company to the customer. All provisions related to the price for such sales, including charges under Rate SB-Standby Service, shall apply.

(I) Indicates Increase

B. Waiver of Overdelivery Charges

The Company may, in its discretion, waive DMT overdelivery charges during or following colder than normal periods and to waive undelivery premiums during or following warmer than normal periods.

MAXIMUM DAILY QUANTITY

The “Maximum Daily Quantity” shall be the maximum volume of gas, expressed in Mcf, as set forth in a DMT Service Customer’s Service Agreement, may be delivered into the Company’s distribution system, during any twenty-four hour period, for transportation by the Company to such Customer as transportation service under this rate schedule. The Company, in its sole discretion and upon request of a DMT Service Customer, may agree to receive and to transport, during any twenty-four period, a volume in excess of the Maximum Daily Quantity as set forth in a transportation Service Customer’s Service Agreement. During any hour of any twenty-four hour period, the Company shall not be required to receive and to transport more than 1/24 of the Maximum Daily Quantity as set forth in a Transportation Service Customer’s Service Agreement.

BILLING

Monthly charges, for transportation service pursuant to this rate schedule, are subject to the Late Payment Charges set forth in Section 16 of the Rules and Regulations of this Tariff.

SPECIAL PROVISIONS

A. The volume of gas delivered into the Company's distribution system, on any day in behalf of Transportation Service Customers for transportation service pursuant to this Rate Schedule, shall be determined by meters and as provided in B, below, at the delivery points specified in the service Agreement or to another point or points acceptable to the Company.

If any such point of delivery is also a point at which the Company buys or exchanges gas for the Company's own account through the same meter, the volume of gas delivered into the Company's distribution system, in behalf of Transportation Service Customers for transportation service, shall be deemed to be the volume scheduled by the Company and such Customers to be delivered in behalf of such Customers, at such point on such day, determined after the adjustment provided in B, below, but shall not be more than the total amount actually delivered, determined after the adjustment provided in B below, through such meter into the Company's distribution system at such point on such day.

B. To compensate for line losses, the volume of gas delivered into the Company's distribution system, shall be determined for purposes of this Rate Schedule, effective August 1, 2013 to be equal to 99.85% of the amount indicated by a meter at the point of delivery into the Company's distribution system; provided however, that, where the only Company facilities involved in transporting gas to the Gas Service Customer are meters, meter installations, house regulators, house regulator installations and industrial measuring and regulating station equipment, no amount shall be deducted as compensation for line losses. (C) (D)

C. Service under this Rate Schedule may be interrupted during periods of supply shortages but only based upon the schedule of priority of curtailment set forth in section 26 of the Rules and Regulations of this tariff.

D. Transportation service under this Rate Schedule may be interrupted or curtailed whenever, in the event of a sudden and unforeseen supply deficiency, the Company invokes emergency curtailment provisions under Tariff Rule 26.

(C) Indicates Change
(D) Indicates Decrease

E. In the event of interruption or curtailment of transportation service, pursuant to items C and D, above, and during such period of interruption or curtailment, the DMT Service Customer must sell to the Company all or a portion of the DMT Service Customer's supply of gas at the higher of (1) the Transportation Service Customer's cost of purchased gas at the point of delivery to the Company or (2) the Company's average cost of purchased gas per Mcf, as determined based upon the Company's Section 1307(f) Rate, which is $5.4664. (D)

F. If a Gas Service Customer receiving gas transported by the Company uses less than the amount of gas delivered into the Company's system for transportation to such Customer ("excess deliveries"), the Gas Service Customer receiving gas transported by the Company may use such gas during the banking/balancing period defined below, following which the Company shall have the right, but not the obligation, to purchase remaining excess deliveries of gas from the DMT service Customer at a rate equal to the lowest of (1) the cost at which it was acquired by the DMT Service Customer, including pipeline transportation charges, or (2) the Company's average commodity delivered cost of gas to National Fuel Gas Supply Corporation, or (3) the Company's average commodity cost of locally produced gas during the month when excess deliveries were received by the Company. The cost at which the DMT Service Customer acquired the gas will be determined from such Customer's contract with the supplier or by a sworn affidavit setting forth the Customer's cost of gas, including cost of delivery of such gas to the Company's system. Upon request by the Company, the DMT Service Customer will be required to furnish to the Company the DMT service Customer's choice of (1) a copy of this contract or (2) an affidavit. The banking/balancing period shall be the three billing months after the billing month in which the Company received excess deliveries in behalf of the Customer.

G. "Underdeliveries" are volumes of gas taken from the Company by a Gas Service Customer in excess of the sum of (1) any excess deliveries of the customer at the beginning of the day and (2) the volume of gas delivered to the Company for the customer's account, after adjustment for line losses less volumes of volumes of gas determined to be sales by the Company to the customer. Cumulative underdeliveries, as determined each day, in excess of two percent of the volume of gas delivered by the Company to the customer that day, shall be a sale of gas by the Company to the customer under the applicable rate schedule plus applicable surcharges as set forth in Rate Schedule SB Special Provisions and shall not be recharacterized as transportation service under any circumstances. Cumulative underdeliveries of not more than two percent of the volume of gas delivered to a customer by the Company on any day may be offset by volumes of gas delivered to the Company for the customer's account, after adjustment for line losses, in excess of the volume of gas taken by the customer from the Company on subsequent days within the same billing month.

H. Service under this rate schedule shall be available only to the extent that there is sufficient capacity for such service in those portions of the Company's system affected by providing of transportation service including but not limited to, that portion of the Company's system where gas is delivered to the Company and that portion of the Company's system where gas is delivered to the Customer. In determining the Company's ability to provide transportation service, sufficient capacity in the Company's system shall be assumed. If service shall not be supplied, based upon insufficient capacity, the burden shall be on the Company to prove such capacity limitation.

I. Where gas is received by the Company for transportation service pursuant to this Rate Schedule, title to such gas shall remain vested in the Transportation Service Customer for which such gas was received for transportation. The Company's furnishing transportation service for a Transportation Service Customer shall be complete upon delivery of gas received for transportation service, except as provided in E and F, above.

J. The Company shall not be liable, under any circumstances or in any respect, to a Gas Service Customer, Transportation Service Customer, a producer of gas or any other person or entity for damages arising either directly or indirectly from interruption, curtailment or termination of transportation service.

K. Revenues produced by charges to DMT customers for overdeliveries of transportation gas to such customers shall be treated in accordance with Paragraph (b)(11) of Rider "A".

L. Customers who contract for transportation service under this Rate Schedule shall have the right thereafter to purchase gas from the Company only to the extent that they have contracted for firm service under Rate Schedule SB for Standby Service or under Rate Schedule PSB for Priority Standby Service. Purchases of gas from the Company by transportation service customers who have not contracted for service under Rate Schedule PSB shall be subject to both the charges under the applicable sales rate schedule and all provisions of the Rate Schedule SB, including the Special Provisions.

M. Customers who elect to schedule their own gas supplies via Company's internet accessible Transportation Scheduling System and/or wish to access and/or obtain each day meter readings of the volume of gas delivered to the Company for the Customer's account and the volume of gas from the Company used by the Customer each day shall execute a Data Security Agreement pursuant to Tariff Rule 33. (C)

(C) Indicates Change

RATE SCHEDULE MMNGS
MONTHLY METERED NATURAL GAS SUPPLIER SERVICE

APPLICABLE TO USE FOR

Service hereunder is available to any licensed supplier ("MMNGS Supplier" or "Supplier") which has obtained the consent and appointment of MMT customer(s) whose volumes total at least 5,000 Mcf on an annual basis ("MMT Customer(s)" or "MMT Pool"), and agrees to assume the primary responsibility for the gas supply obligations for that group of MMT Customers.

CHARACTER OF SERVICE

Through the procedures and provisions of this Monthly Metered Natural Gas Supplier rate schedule qualified MMNGS Suppliers will contract for service with qualified MMT Customers and shall serve such MMT Customers for an established term lasting at least one month or one billing cycle.

The Company will bill the Supplier for aggregation services (including any purchases of Company gas) provided to the Supplier.

RATES AND CHARGES

A. Supplier Aggregation Charges

The MMNGS Supplier shall be billed the charges for services rendered for it as provided herein. A MMNGS Service Agreement will allow Suppliers under this service classification to aggregate supplies to serve individual qualified MMT Customers. When necessary to accommodate changes in customer supply and delivery requirements during the month, the Company will permit deliveries of interstate supplies into intrastate market pools. In order to accommodate such deliveries of interstate supplies into intrastate market pools, the MMNGS Supplier will be billed for the amount of interstate deliveries to intrastate pools at a rate of $0.000/Mcf. (D)

B. Administrative Charges

The Company will charge the MMNGS Supplier an administrative fee of $100.00 per month for each MMNGS Service Agreement executed with the Company. This charge shall be waived for individual MMT Customers that will be their own MMNGS supplier and have a single account in their MMT Pool.

C. Exchange Fee

The Company will charge the Supplier an exchange fee of $0.05 per Mcf for each Mcf transferred from and $0.05 per Mcf transferred to a MMT Pool.

D. Billing Service Charges

An MMNGS Supplier may elect to have the Company bill gas supply charges to the Supplier's MMT customers. The rate to be charged by the Company to the Supplier for Standard Billing Service shall be $0.20 for each bill rendered to an MMT Customer for the Supplier.

(D) Indicates Decrease

RATE SCHEDULE MMNGS
MONTHLY METERED NATURAL GAS SUPPLIER SERVICE (Cont.)

The Company shall provide the Supplier receiving standard Billing Service with meter reading information and other reports in the Company's standard electronic format on a basis corresponding to the MMT Customer's billing cycles. The Supplier shall provide the Company with all required Supplier billing and rate information necessary for customer billing as determined by the Company. The Supplier shall provide such billing information in the Company's required format. The Supplier shall provide its billing information no later than three business days before the last day of the month.

The Company will bill the MMT Customer for gas supplies sold by the Supplier to the Customer subject to the Supplier entering into a billing service contract with the Company. Payments made by the MMT Customer under the billing service will be applied first to amounts to past service due under an amortization agreement with the Company, next to current bills due to the Company, next to gas supply charges owed to the Supplier, next to charges for other non-regulated service charges, and lastly to any "neighbor for neighbor" contribution. The terms and charges for the Supplier billing services other than Standard Billing Services may be negotiated between the Company and the Supplier. The Company shall be under no obligation to provide the Supplier billing services other than Standard billing Services if mutually agreeable terms and charges cannot be negotiated.

SPECIAL PROVISIONS

A. Gas Quality

Gas delivered by the Supplier must satisfy the quality specifications included in the Rules for Transportation Service section of this tariff. For deliveries to the Company, such deliveries must be made at an appropriate Company facility located within the Territory, as described in this tariff, or at another point or points acceptable to the Company.

B. Allocation Priority

If any such point of delivery is also a point at which the Company buys or exchanges gas for the Company's own account though the same meter, the volume of gas delivered into the Company's distribution system, in behalf of MMT customers, shall be deemed in behalf of such MMT Customers, at such point on such day, determined after the adjustment provided in C, below, but shall not be more than the total amount actually delivered, determined after the adjustment provided in C below, through such meter into the Company's distribution system at such point on such day.

C. Allowance for Losses

As allowance for losses incurred in the process of delivery except as provided in Special Provision B under the MMT Rate schedule, Leaf No. 105, the Supplier shall provide the Company with a volume of gas equal to 0.15% of the amount delivered to the Company. (D)

(D) Indicates Decrease

RATE SCHEDULE MMNGS
MONTHLY METERED NATURAL GAS SUPPLIER SERVICE (Cont.)

D. City Gate Balancing

1. Determination of Daily Delivery Quantities and Aggregate Daily Delivery Quantities

The Company, based upon each MMT Customer's historical load profile and/or estimates of consumption as applied to any forecasted weather, shall determine a MMNGS Supplier's MMT Customer's projected weather normalized consumption for a given period; either monthly, weekly, or daily. Based upon this projected consumption, actual consumption readings as available and based on the system requirement to manage storage capacity retained by the Company to meet MMT Customer's daily balancing requirements, the Company will determine each MMT Customer's Daily Delivery Quantity (DDQ) and the Company will also determine the Supplier's MMT Pool's Aggregate Daily Delivery Quantity (ADDQ) by summing all DDQs of the MMT Customers in the Supplier's MMT Pool. The DDQs established under this rate schedule shall be calculated so as to minimize month end burner tip imbalances. In determining the DDQ of the customer group the maximum heating degree day ("HDD") amount utilized in the DDQ calculation shall be 52 HDDs. The DDQs and ADDQ so calculated will be used to determine the Supplier's daily delivery obligations at the Company City Gate. (C)

A MMNGS Supplier taking service under this rate schedule accepts the Company's calculation of the DDQ and/or ADDQ. The Company shall not be liable for the difference between the projected consumption and the consumption determination by the Company.

2. Delivery Requirements

Deliveries of natural gas at the City Gate under this rate schedule shall be made to meet the DDQs for all customers in a MMNGS Supplier's MMT Pool (the ADDQ) within a tolerance band described below. The Company will deliver to each individual MMT Customer its requirements.

With respect to Appalachian production sources connected directly to the Company's system, 100% of the historical average daily production for the month will be accepted as delivered to the system for meeting the DDQ delivery requirements of the MMNGS Supplier. While 100% of the historical daily average shall be made available, gas must be scheduled on a daily basis to be delivered to an MMT Pool in order for volumes to be allocated that day. In no event shall volumes that are not scheduled for delivery to MMNGS Pools be made available as a carryover for nominations to MMT pools on a subsequent day during the month.

To the extent the Supplier's City Gate deliveries differ from the ADDQ provided to the Supplier by the Company then a City Gate Imbalance shall occur ("Imbalance") and charges for such Imbalance will be incurred as described below.

The Company is not obligated to accept any quantities nominated by Supplier in excess of its MMT Pool's ADDQ.

(C) Indicates Change

RATE SCHEDULE MMNGS
MONTHLY METERED NATURAL GAS SUPPLIER SERVICE (Cont.)

3. City Gate Imbalance Charges

For City Gate deliveries by the MMNGS Supplier that differ from the applicable ADDQ, the Supplier will incur the following charges:

a. Charges for Daily City Gate Underdeliveries

i. For daily City Gate underdeliveries up to or equal to five (5) percent of the applicable ADDQ, there will be no charge.

ii. For Daily City Gate underdeliveries in excess of five (5) percent of the applicable ADDQ during the Summer Period (April through October), the charge for the gas supplied by the Company to make up for the underdeliveries shall be equal to the higher of $7.00 per Dth or 110% of the DMI for that day plus all transportation costs to the Company’s City Gate. (C)

iii. For Daily City Gate underdeliveries in excess of five (5) percent of the applicable ADDQ during the Winter Period (November through March), the charge for the gas supplied by the Company to make up for the underdeliveries shall be equal to the higher of $10.00 per Dth or 110% of the DMI for that day plus all transportation costs to the Company’s City Gate. (C)

iv. During OFO periods, the charges described in Section G herein shall apply in addition to those charges specified in this Section D.3.

b. Charges for Daily City Gate Overdeliveries

There shall be no charges for Daily City Gate overdeliveries of up to five (5) percent of the applicable ADDQ, however, any such overdeliveries in excess of five (5) percent of the applicable ADDQ may be rejected by the Company in its sole discretion.

E. MMNGS Burner Tip Imbalances

1. Aggregation of MMNGS Burner Tip Imbalance

For the MMT customers included in the MMNGS Supplier’s MMT Pool, the Company will net all the month end burner tip imbalances for which the Supplier is responsible pursuant to this rate schedule into a single monthly burner tip imbalance (“MMNGS Burner Tip Imbalance”).

(C) Indicates Charge

RATE SCHEDULE MMNGS
MONTHLY METERED NATURAL GAS SUPPLIER (Cont.)

2. Resolution of MMNGS Burner Tip Imbalances

The Company will resolve MMNGS Burner Tip Imbalances through either a rollover to subsequent months or a cash out pursuant to Rule 30. The default method of MMNGS Burner Tip Imbalance resolution will be the cash out. Should the Company determine that circumstances render resolution of imbalances via cash out operationally infeasible, the Company may, in discretion and upon reasonable notice, suspend the cash out and resolve imbalances through rollover. (C)

a. Rollover Procedure (C)

At the close of the billing month, the Company will calculate the MMNGS Burner Tip Imbalance, as described above, for each MMT Pool. The Company shall adjust the applicable ADDQ for the next following month that operating conditions permit, upward to reconcile a net deficiency in the billing month, or downward to reconcile a net surplus in the billing month.

b. Cash Out Procedure (C)

i. MMNGS Burner Tip Imbalances Resulting in Net Overdelivery

For MMNGS Burner Tip Imbalances which result in a net overdelivery of volumes of gas for a MMT Pool during the month, the Company shall resolve the imbalance pursuant to Rule 30. (C)

ii. MMNGS Burner Tip Imbalances Resulting in Net Underdelivery

For MMNGS Burner Tip Imbalances which result in a net underdelivery of volume of gas for a MMT Pool during the month, the Company shall resolve the imbalances pursuant to Rule 30. (C)

3. Exchange of Net Burner Tip Imbalances

A Supplier may exchange a Burner Tip Imbalance due the Company under its MMNGS Service Agreement with a Burner Tip Imbalance due from another Supplier under another MMNGS Service Agreement or a Supplier under a SATS Service Agreement. Exchange of imbalances shall be accomplished pursuant to Rule 30. (C)

RATE SCHEDULE MMNGS
MONTHLY METERED NATURAL GAS SUPPLIER SERVICE (Cont.)

F. System Maintenance Order (“SMO”)

1. Issuance of SMOs

The Company shall issue System Maintenance Orders from time to time which assure that gas is flowing to the City Gate where and when needed. Such SMOs shall include but not be limited to orders to deliver gas at any or all of the points obtained by Suppliers to deliver gas at particular primary points into National Fuel Gas Supply Corporation. Should MMNGS Suppliers fail to comply with such SMOs then the Company shall issue OFOs as described below.

2. Communication of SMOs

SMOs will be communicated to the Supplier through the Company’s website with four hours advanced notice. Such notice will be supplemented by the use of internet E-mail notification to a Supplier’s Internet address.

3. Access to Upstream Pipeline Information

To monitor compliance with SMOs, the Supplier shall be required to provide the Company with the permission to access nomination information. (C)

G. Operational Flow Order (“OFO”)

1. Issuance of OFOs

The Company reserves the right to issue Operational Flow Orders as necessary to preserve the operational integrity of its system. Such OFOs may include, but shall not be limited to the following: a requirement to flow gas to the citygate, a reduction in Daily City Gate delivery tolerance and a requirement to flow gas to the Supplier’s primary receipt points on NFGSC.

2. Charges for Violation of OFOs

In addition to all other charges due the Company, any gas not delivered by MMNGS Supplier in violation of any OFO issued under this Section G may be assessed a charge of the higher of $25 per Dth or the DMI for that day plus all transportation costs to the Company’s City Gate.

3. Communication of OFOs

OFOs will be communicated to the Supplier through the Company’s website with four hours advanced notice. Such notice will be supplemented by the use of internet E-mail notification to a Supplier’s Internet address.

4. Access to Upstream Pipeline Information

To monitor compliance with OFOs, the Supplier shall be required to provide the Company with the permission to access nomination information. (C)

RATE SCHEDULE MMNGS
MONTHLY METERED NATURAL GAS SUPPLIER SERVICE (Cont.)

H. Termination of Service for Failure to Deliver Daily Quantity

1. The Company shall have the right to terminate service under this rate schedule to any Supplier that fails for any three (3) days to deliver at least ninety-five (95) percent of the applicable ADDQ for the Supplier's MMNGS Pool, measured during a single thirty day period ("Terminated Supplier") or one day of zero delivery. The terminated Supplier, at the Company's option, may be prohibited from receiving service under this rate schedule for 6 months if the MMT Customer does not take service from another qualified MMNGS Supplier. Such Terminated Supplier's MMT Customers will be served by the Company pursuant to the terms of the Standby Rate Schedule.

2. Supplier's MMT customers may be notified by the Company as to the impending transfer to Company service, together with a statement that the transfer is the result of the Supplier's failure to perform as required. The Company shall recover the cost of such notice from the Supplier by drawing down the Supplier's security deposit or other security instrument.

I. Supplier Qualification Criteria

1. Pursuant to 52 Pa. Code Chapter 62, Company may request and adjust security from Supplier and service under this Rate Schedule is contingent upon the MMNGS Supplier meeting and maintaining the creditworthiness standards. (C)

Applicants for service hereunder will be required to complete a Credit Application for evaluation by the Company based on the criteria set forth in this tariff. The results of the creditworthiness checks performed by the Company will be communicated to the applicant within two weeks of the Company's receipt of the properly completed application.

2. The MMNGS Supplier's application shall include a description of the MMNGS Supplier's operational capability for meeting the requirements of its MMT Pool. The Company shall then make a determination as to whether this capability is sufficient.

(C) Indicates Change

RATE SCHEDULE MMNGS
MONTHLY METERED NATURAL GAS SUPPLIER SERVICE (Cont.)

3. MMNGS Suppliers shall include with their application payment of a non-refundable $500 fee. For natural gas suppliers serving MMT Customers on August 1, 2006, and all individual MMT Customers that will be their own MMNGS Supplier, the application fee shall be waived by the Company.

J. MMNGS Supplier Obligations

1. Suppliers may enroll customers for service commencing with the MMT Customer's meter reading in any month. Service to the MMT Customer shall begin at the start of the customer's billing cycle after enrollment confirmation has been provided by the Company.

2. Enrollments/drops shall occur electronically, however, each MMNGS Supplier will be obligated to keep on file either oral or written evidence of each customer's enrollment with that Supplier, which evidence shall be available for Company review at any time, upon 24 hours' notice. The Company will provide the MMT Customer with a letter confirming enrollment, if the Customer notifies the Company within 5 days (through October 25, 2018, thereafter as per 52 Pa. Code §59.93 - §59.94) of issuance of the confirmation letter that the Customer does not wish to be served by the MMNGS Supplier, the enrollment of the Customer will be rescinded. (C)

3. To the extent of MMNGS Supplier's MMT Customer at any time is not served any longer by that MMNGS Supplier and is then the responsibility of the Company, effective upon the transfer of that customer to the Company, the Company shall charge the customer for all Company provided natural gas under the terms of the Standby rate schedule.

4. MMNGS Suppliers agree to abide by any other specific requirements in the Company's Operational Procedures Manual.

(C) Indicates Change

RATE SCHEDULE MMNGS
MONTHLY METERED NATURAL GAS SUPPLIER SERVICE (Cont.)

K. MMNGS Service Agreement

The initial term of the MMNGS Service Agreement between the Company and the MMNGS Supplier shall be for an annual period and renewable annually for successive one-year terms unless canceled by default of any terms or conditions hereof, or by the Company or the Supplier on sixty (60) days written notice prior to the end of a term, or otherwise by mutual agreement.

L. Force Majeure

MMNGS Supplier will be excused from delivering the required daily quantity of supply on any given day for Force Majeure events which directly and substantially affect a MMNGS Supplier's natural gas deliveries to the Company and for which alternate supply arrangements cannot be obtained by MMNGS Supplier or, if the MMNGS Supplier is unsuccessful in obtaining alternate supplies, for which the Company cannot obtain supplies on behalf of the MMNGS Supplier. For supplies provided by the Company, the MMNGS Supplier shall be charged the higher of 125% of the Residential purchased gas cost (commodity and demand) identified in Rider A or the highest DMI during the month plus all transportation costs to the Company's City Gate for each day such alternate supplies are delivered on behalf of MMNGS Supplier. For purposes of this rate schedule, a Force Majeure event will be any failure of the final pipeline delivering gas to the Company or an upstream pipeline feeding such pipeline, with such failure having been classified as a Force Majeure event pursuant to the terms of that pipeline's Federal Energy Regulatory Commission approved tariff. A Force Majeure event that curtails the MMNGS Supplier's assigned firm transportation service on an upstream pipeline that ultimately feeds a downstream pipeline, which directly and substantially affects a MMNGS Supplier's natural gas deliveries to the Company, and for which no alternative supplies are available from the Company or other sources will excuse a MMNGS Supplier from performing pursuant to this rate schedule to the extent of such curtailment. If at such time the MMNGS Supplier is delivering gas to other customers on the same interstate pipeline system, the volume excused from performance on the Company's system will be no more than a proportionate amount of the affected deliveries curtailed by the Force Majeure event. The MMNGS supplier is responsible for supplying complete information and verifiable proof of all the particulars requested by the Company related to any such Force Majeure exclusion. (C)

(C) Indicates Change

RATE SCHEDULE MMNGS
MONTHLY METERED NATURAL GAS SUPPLIER SERVICE (Cont.)

In order to validate a claim of Force Majeure, the MMNGS Supplier must have a firm, non-interruptible service with the affected pipeline that is covered by the Force Majeure event and must be willing to present such agreements to the Company.

Volumes not delivered pursuant to this Special Provision must be made up by MMNGS Supplier as soon as possible at a delivery rate to be established by the Company. Any curtailed volumes which are not made-up within thirty (30) days will be sold to MMNGS Supplier at a rate of $10.00 per Mcf.

M. Title to Gas

Supplier warrants that, at the time of delivery of gas to the Company's City Gate, Supplier or Customer shall have good title to deliver all volumes made available.

N. Control and Possession

After Supplier delivers gas or causes gas to be delivered to the Company, the Company shall be deemed to be in control and possession of the gas until it is redelivered to the Customer at Customer's meter.

O. 24 Hour Availability

Supplier shall include on the MMNGS Service Agreement a phone number by which Supplier can be reached on a twenty-four (24) hour basis.

P. Data Security Agreement

(C)

Marketers, suppliers, and agents shall execute a Data Security Agreement pursuant to Tariff Rule 33.

(C) Indicates Change

RATE SCHEDULE SATC
SMALL AGGREGATION TRANSPORTATION CUSTOMER SERVICE

APPLICABLE TO USE FOR

Service hereunder is available on or after October 30, 2001 to any qualified customer ("SATC Customer" or "Customer") that has enrolled to receive gas supply service from a qualified supplier under the Company's Small Aggregation Transportation Supplier Service ("SATS Supplier" or "Supplier").

The Purchase of Receivable Program (Docket No. P-2009-2099182) will be implemented upon Commission Order and the completion of the necessary system changes.

CHARACTER OF SERVICE

Through the procedures and provisions of this Small aggregation Transportation rate schedule SATC Customers will contract for service with a SATS Supplier and be served by such Supplier for an established term ending at the SATC Customer's meter reading in April (April billing cycle). The enrollment period and service starting dates will be as specified in Rate Schedule SATS.

The Company will maintain a list of SATS Suppliers including appropriate contact information as provided by the SATS Supplier. This list will be made available to customers upon request.

There are two (2) billing options. The default option is utility consolidated billing under which the Company renders a single bill, including NGDC and NGS charges to the SATC customer, and remits payment to the Supplier. The Company will buy the SATC NGS receivable at a discount of those customer groups eligible for the POR program. Suppliers using consolidated billing for eligible POR customer groups must participate in the POR program. Suppliers participating in the POR program must use the consolidated billing option and enter into the Billing Services Agreement. The second option is the dual bill model, where the Company bills the SATC customer for regulated service only. The POR program is not available for Suppliers utilizing the dual billing option.

Customers shall not participate in both CAP and the Small Aggregation Transportation Customer Service program. (C)

RATE SCHEDULE SATC
SMALL AGGREGATION TRANSPORTATION CUSTOMER SERVICE (Cont'd)

RATES AND CHARGES

A. Customer Transportation Service Rates

The Company will provide transportation services to deliver gas supplies to the SATC Customer(s). The Customer shall be billed the charges for the transportation services rendered for it at the appropriate charges provided herein for which service the SATC Customer qualifies.

The SATC Customer shall pay the following transportation charges for the transportation of gas. The commodity rates set forth below contain a component, presently $0.04453 per Ccf, for the recovery of purchased gas demand costs and shall be adjusted pursuant to Rider A of the tariff. Such purchased gas costs collected though these rates shall be included as revenues for the recovery of purchased gas costs as specified in Rider A of this tariff. (D)

(D) Indicates Decrease (I) Indicates Increase

RATE SCHEDULE SATC
SMALL AGGREGATION TRANSPORTATION CUSTOMER SERVICE (Cont.)

1. Residential Transportation Rates

SATC Customers that meet the qualifications under the Residential Service Rate Schedule classification:

Rates per Residential SATC Customer per Month:

$14.00	Basic Service Charge	
$0.34064	per 100 cubic feet (I)	(D)

2. Commercial and Public Authority Transportation Rates

SATC Customers that meet the qualifications under the Commercial and Public Authority Service Rate Schedule classification:

a. Rates per Commercial/Public Authority customer per month for "Small" Commercial/Public Customers using not more than 250,000 cubic feet per year:

$27.00	Basic Service Charge	
$0.27447	per 100 cubic feet	(D)

b. Rates per Commercial/Public Authority customer per month for "Small" Commercial/Public Customers using greater than 250,000 cubic feet but not more than 1,000,000 cubic feet per year:

$37.00	Basic Service Charge	
$0.25008	per 100 cubic feet	(D)

c. Rates per Commercial/Public Authority customer per month for "Large" Commercial/Public Customers:

$151.00	Basic Service Charge	
$0.21075	per 100 cubic feet	(D)

(D) Indicates Decrease (I) Indicates Increase

RATE SCHEDULE SATC
SMALL AGGREGATION TRANSPORTATION CUSTOMER SERVICE (Cont.)

3. Small Volume Industrial Service Transportation Rates

SATC Customers that meet the qualifications under the Small Volume Industrial Service Rate Schedule classification:

Rates per Small Volume Industrial Service SATC Customer per Month:

$82.00	Basic Service Charge	
$0.25175	per 100 cubic feet	(D)

4. Intermediate Volume Industrial Service Transportation Rates

SATC Customers that meet the qualifications under the Intermediate Volume Industrial Service Rate Schedule classification:

Rates per Intermediate Volume Industrial Service SATC Customer per Month:

$252.00	Basic Service Charge	
$0.17800	per 100 cubic feet	(D)

B. Miscellaneous Customer Surcharges

1. Residential rate classes shall be subject to surcharges in accordance with Rider F - CAP Discount Charge as set forth in this tariff.

2. The above non-purchased gas cost SATC rates shall be subject to surcharges in accordance with provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge.

(D) Indicates Decrease (I) Indicates Increase

RESERVED FOR FUTURE USE

RATE SCHEDULE SATC
SMALL AGGREGATION TRANSPORTATION CUSTOMER SERVICE (Cont.)

(C)

SPECIAL PROVISIONS

A. Qualified Suppliers

Customers under this service classification may only receive service from qualified SATS Suppliers. Such qualified SATS Suppliers are required, among other things, to meet the Consumer Protections requirements of the SATS Rate Schedule.

B. Termination of SATS Supplier

If the SATS Supplier serving the SATC Customer is terminated the SATC Customer shall be served by the Company under the appropriate sales service rate schedule for all services provided after the termination of the Supplier. The Company is the Supplier of Last Resort ("SOLR"). As such, it will sell gas supplies to customers who have not chosen an alternative National Gas Supplier, choose to be supplied by the Company or whom Natural Gas Suppliers have declined to serve, provided that the customer has met all of the terms and conditions for receiving service set forth in this tariff.

C. Restriction of Customer Information Provided to Suppliers

The Company may not release customer information to a third party unless the customer has been notified of such intent and has been provided a method to restrict the release of private information. Customers may restrict the provision of information by returning a signed form, orally or electronically.

The customer may choose to restrict the release of customer information according to one of the following two restriction options:

1. Restrict the release of only the customer's historical billing data.

2. Restrict the release of all private customer information including name, billing address, service address, rate class, rate sub-class, account number and historical billing data.

Telephone numbers may not be released to third parties under any circumstances.

(C) Indicate Change

D. Customer Rights as to the Handling of Complaints

Inquires and complaints from any customer will be received and processed in a timely manner. Residential customer inquiries and complaints will be handled in conformance with Chapter 56 of the Commission's Rules. When a customer inquiry or complaint relates to services provided by an SATS Supplier, the Company will refer the customer to the SATS Supplier for a response. If a customer inquiry or complaint involves issues or services provided by both the Company and the customer's SATS Supplier, the Company will develop and then maintain a system of tracking and coordinating the response to the customer inquiry or complaint from both parties. If a customer is dissatisfied with the Company's response, or indicates dissatisfaction with the SATS Supplier response to the customer with respect to the NGS services, the Company will inform the customer of the right to file an informal appeal with the Bureau of Consumer Services at the Commission and provide the customer with the toll-free telephone number and mailing address of the Commission.

E. Billing in the Event of a SATS Supplier Default

In the event of a default or discontinuance by a SATS Supplier, the Company will charge the customer the rate agreed to by the SATS Supplier and the customer for the remainder of the billing period, provided that the Company either has available or is provided the agreed upon rate by the Supplier or the Commission, and the Company will recover any difference between its costs and the SATS Supplier rate charged to the customer solely from the SATS Supplier or its bond or other security.

F. Termination of Service due to Non-Payment (C)

In addition to any right to terminate service under the Pennsylvania Public Utility Code, Commission regulations or this tariff, the Company may also terminate service for nonpayment of a billing or billings for natural gas supply charges provided by a SATS Supplier when the receivable is purchased by the Company. Such termination of service shall be in accordance with general regulations of the Pennsylvania P.U.C. applicable thereto and in accordance with the Pennsylvania Utility Code. Such termination shall be applicable to the SATC Residential, SATC Small Commercial and Public Authority under 250 Mcf/year, SATC Small Commercial and Public Authority between 250 and 1,000 Mcf/year and the SATC Small Volume Industrial less than 1,000 Mcf/year classifications under the Purchase of Receivable Program.

SATC customers under the POR program may avoid termination if such customer pays the termination notice amount. The termination notice amount will be the lower of the past due charges actually billed or the past due charges that would have been due had the customer received service at Distribution's otherwise applicable sales rate during the time the customer accrued the unpaid balance("Lesser of Calculation").

Terminated residential SATC customers under the POR program may be reconnected if such residential customer pays the termination notice amount.

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE

APPLICABLE TO USE FOR

Service hereunder is available on or after October 30, 2001 to any supplier ("SATS Supplier" or "Supplier") which has obtained the consent and appointment of a group of at least 50 relevant customers or a group of relevant customers whose volumes total at least 5,000 Mcf on an annual basis ("SATC Customer(s)" or "SATC Customer Group"), and agrees to assume the primary responsibility for the gas supply obligations for that group of SATC Customers. (C)

CHARACTER OF SERVICE

Through the procedures and provisions of this Small Aggregation Transportation Supplier rate schedule qualified SATS Suppliers will contract for service with qualified SATC Customers and shall serve such SATC Customers for an established term ending at the conclusion of the SATC Customer's meter reading in April (April billing cycle).

The Company will bill the Supplier for aggregation services (including any purchases of Company gas) provided to the Supplier.

RATES AND CHARGES

A. Supplier Aggregation Charges

The SATS Supplier shall be billed the charges for the aggregation services rendered for it at the appropriate Supplier aggregation charges provided herein. A SATS Service Agreement will allow Suppliers under this service classification to aggregate supplies to serve individual qualified SATC residential customers and qualified SATC non-residential customers. (C)

(C) Indicates Change

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

1. Billing Service Charges

For a pilot period of three years, terminable by the Company at the end of the third year following 12 months prior notice to participating Suppliers, the Company will purchase amounts receivable for SATC customers with annual consumption less than 1,000 Mcf/year as described herein and further detailed in the billing agreement.

The rate to be charged by the Company to the Supplier for Standard Billing Service shall be $0.20 for each bill rendered to an SATC Customer for the Supplier.

The Company shall provide the Supplier receiving Standard Billing Service with meter reading information and other reports in the Company's standard electronic format on a basis corresponding to the SATC Customer's billing cycles. The Supplier shall provide the Company with all required Supplier billing and rate information necessary for customer billing as determined by the Company. The Supplier shall provide such billing information in the Company's required format. The Supplier shall provide Supplier billing information no later than three business days before the last day of the month.

The Company will bill the SATC Customer for gas supplies sold by the Supplier to the Customer subject to the Supplier entering into a billing service contract with the Company. For Consolidated billing service where the Company does not purchase the Supplier's receivable payments made by the Customer under the billing service will be applied first to amounts to past service due under an amortization agreement with the Company, next to current bills due to the Company, next to gas supply charges owed to the Supplier, next to charges for other non-regulated service charges, and lastly to any "neighbor for neighbor" contribution. The terms and charges for the Supplier billing services other than Standard Billing Services may be negotiated between the Company and the Supplier. The Company shall be under no obligation to provide the Supplier billing services other than Standard Billing Services if mutually agreeable terms and charges cannot be negotiated.

The Company will purchase the accounts receivable from POR Suppliers servicing SATC Residential, SATC Small Commercial and Public Authority customers less than 250 Mcf/year, SATC Small Commercial and Public Authority customers between 250 and 1,000 Mcf/year and SATC Small Volume Industrial customers less than 1,000 Mcf/year at a discount where the Company is providing a Utility Consolidated Bill to the customer. The residential (I)
discount is 1.8661% and the non-residential discount is 0.4027%. (D)

To the extent that a POR customer account has an unpaid balance on its final bill's late payment date or at the time the unpaid account balance is transferred to another active account, the Company will deduct from the payment to the POR SATS Supplier for the purchase of its receivable the unpaid billed amounts in excess of the amount that would have been due had the customer received service at Distribution's otherwise applicable sales rate during the time the customer received service from the SATS Supplier (pursuant to Rate Schedule SATC Section F "Lesser of Calculation").

(C) Indicates Change

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

SPECIAL PROVISION

A. Gas Quality

Gas delivered by the Supplier must satisfy the quality specification of the pipelines used to transport Supplier’s gas. For deliveries to the Company, such deliveries must be made at an appropriate Company facility located within the Territory, as described in this tariff, or at another point or points acceptable to the Company.

B. Allowance for Losses

As allowance for losses incurred in the process of delivery, the Supplier shall provide the Company with a volume of gas equal to 0.15% of the amount delivered to the Company. In addition, for deliveries into Company capacity retained pursuant to Sections C.3. and C.5., Suppliers shall provide incremental quantities of gas equal to the amount of retainage required to transport gas from the receipt point into such Company retained capacity to the entry point to the Company’s system (“City Gate”). (D)

(D) Indicates Decrease

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

C. Total Upstream Capacity Requirements for SATS Suppliers

SATS Suppliers shall be required to provide sufficient firm pipeline transportation and storage capacity to meet the estimated extreme day requirements of their SATC Customer groups as further described below. The SATS Suppliers' estimated extreme day requirements of their SATC Customer Group used for Supplier capacity allocations and requirements shall be based on a sixty-two (62) degree day extreme peak day calculation. The Company shall utilize peaking and temperature swing storage capacity retained by the Company and recovered through SATC rates to provide for any variances between actual and forecasted usage and for any peak delivery requirements for days colder than sixty-two (62) degree days.

Such sufficient pipeline transportation and storage capacity shall be provided through the following means:

1. Released ESS Storage Capacity and Associated EFT Capacity

a. Requirements To Be Met Through ESS Storage

52% of extreme peak day requirements shall be provided through the Company's ESS storage and associated EFT transportation capacity on NFGSC. Such NFGSC Storage and transmission capacity shall be released to SATS Suppliers at the maximum rate under the pipeline's FERC gas tariff. (D)

b. Initial Assignment of ESS Storage Capacity

In a month a SATS Supplier begins to serve SATC customers, it shall be provided with an initial assignment of storage capacity, based on the percentage set forth at C.1.a. above, to meet the Supplier's requirements for the upcoming winter period. Approximately fifteen days prior to the close of nominations for the month, the Company will calculate the quantity of storage capacity released to match the SATS Supplier's winter requirements based on the number of SATC Customers aggregated by the Supplier. If the initial assignment takes place in a month other than April, the Company will transfer storage gas to the Supplier pursuant to C.1.c below. The SATS Supplier shall be responsible for all taxes and pipeline fees associated with moving or transferring the storage gas to the Company.

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

c. Additional Assignments of ESS Storage Capacity

Approximately fifteen days prior to the close of nominations for each month, the Company will recalculate the quantity of storage capacity released to match the SATS Supplier's revised winter requirements based on the number of SATC Customers aggregated by the Supplier. If additional SATC Customers join a SATS Supplier's SATC Customer Group, the Company will release additional capacity as required, based on the percentage set forth at C.1.a. above. In addition, the SATS Supplier will be required to pay the Company for storage gas transferred and all taxes and pipeline fees associated with moving or transferring the storage gas to the Supplier. The storage gas transfer rate shall be the sum of (1) the higher of the Company's average cost of gas based upon the Company's Section 1307f rate, or the DMI for the first day of month in which gas is transferred plus all transportation costs to the Company's City Gate, plus (2) the demand Transfer Recovery Rate ("DTR Rate"). The DTR rate shall equal the per Mcf System Average Unrecovered Demand Charge revenue beginning in the month of April through the initial month that storage capacity is released to the Supplier. The System Average Unrecovered demand Charge Revenue shall equal the sum of the differences between the average demand charge revenues and the average fixed demand costs beginning the month of April through the initial month that storage capacity is released to the Supplier.

The DTR by month shall be as follows:

Capacity Transfer Month	DTR $/Mcf	
April	$0.00	
May	$0.00	
June	$0.00	
July	$0.00	
August	$0.00	
September	$0.00	
October	$0.01	
November	$0.70	(I)
December	$1.01	(I)
January	$0.83	(I)
February	$0.37	(I)
March	$0.00	

(D) Indicates Decrease (I) Indicates Increase

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

c. Additional Assignments of ESS Storage Capacity (Cont.)

All revenues received from such storage gas transfers shall be credited as revenues for the recovery of purchased gas costs as specified in Rider A of this tariff.

Storage gas shall be transferred with released capacity effective the first day of the month as follows:

Capacity Transfer Month	Volumes of Storage Gas Transferred as a Percentage of Released Capacity
April	0%
May	0%
June	12%
July	29%
August	46%
September	63%
October	80%
November	95%
December	86%
January	68%
February	45%
March	28%

(C)

If the monthly minimum storage inventory level (expressed as a percentage) applicable to the last day of a calendar month has been relaxed, the same percentage shall apply to the volumes of storage gas transferred as a percentage of released capacity effective the first day of the following month.

(C) Indicates Change

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

d. Return of ESS Storage Capacity

In a month when the quantity of storage capacity released to match the SATS Supplier's revised winter requirements decreases, the SATS Supplier shall return storage capacity to the Company. The Supplier may either (1) transfer the remaining storage gas to a third party, subject to applicable pipeline requirements and charges; (2) retain the storage gas in the Supplier's remaining storage capacity or (3) transfer the storage gas to the Company at the lesser of (a) 95% of the injection period weighted DMI for the first day of the month during the previous storage injection period (April through October), plus all transportation costs to the Company's City gate; or (b) 95% of the DMI for the first day of the month plus all transportation costs to the Company's City Gate. With respect to (a) above, a weighting factor shall be applied to the DMI plus all transportation costs to the Company's City gate for each month as follows: 6% for the months April and May, 17% for the months June through September and 20% to October. The SATS Supplier shall be responsible for all taxes and pipeline fees associated with moving or transferring the storage gas to the Company. (C) (C)

If a Supplier's SATS Agreement is canceled or terminated, the Company will recall ESS storage and associated EFT transmission capacity that has been released to the Supplier unless either: (1) the Company no longer requires the ESS storage and associated EFT transmission capacity to serve sales and SATC customers or (2) the Company can obtain or has obtained satisfactory substitute storage and related transmission capacity at a lower cost. The Company shall have the right but not the obligation to purchase the remaining storage gas at the lesser of (a) 95% of the injection period weighted DMI for the first day of the month during the previous injection period (April through October), plus all transportation costs to the Company's City Gate and a proportionate share of storage demand capacity charges on such volumes since April 1; or (b) 95% of the DMI for the first day of the month plus all transportation costs to the Company's City Gate and proportionate storage demand capacity charges on such volumes since April 1. With respect to (a) above, a weighting factor shall be applied to the DMI plus all transportation costs to the Company's City gate for each month as follows: 6% for the months April and May, 17% for the months June through September and 20% to October. The SATS Supplier shall be responsible for all taxes and pipeline fees associated with moving or transferring the storage gas to the Company. (C) (C)

e. Required ESS Storage Inventory Levels

Suppliers will be required to follow a schedule set out by the Company such that the particular storage levels are obtained throughout the year, to assure the Supplier's SATC customers' needs are met by the Supplier.

(C) Indicates Change

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

e. Required ESS Storage Inventory Levels (Cont.)

In addition to meeting the City Gate balancing requirements set forth below, Suppliers must meet a minimum storage inventory level of:

12% on May 31,
29% on June 30,
46% on July 31,
63% on August 31,
80% on September 30,
95% on October 31,
86% on November 30,
68% on December 31,
45% on January 31,
28% on February 28 (February 29 in a leap year)

(C)

Any deficiency more than 2% below the required monthly minimum storage inventory level will be automatically adjusted by the Company to meet the required level. The supplier will be charged per Mcf for such automatic adjustment at the higher of $7.00 per MCF or the DMI for that day plus all transportation costs to the Company's City Gate. For any deficiency within 2% of the required monthly minimum storage inventory level, the Supplier will be charged per Mcf for such adjustment at the DMI for that day plus all transportation costs to the Company's City Gate, unless the Company, subject to operating conditions, determines that such deficiencies need not be adjusted.

The Supplier shall be required to provide the Company with the permission necessary to allow the Company to obtain access to the supplier's storage balance information to provide assurance of compliance with the monthly storage inventory requirements.

The Company may elect to relax the monthly minimum storage inventory level applicable to all Suppliers by posting notice on its web site at least 5 business days prior to the last day of the first month to which a relaxed limit would apply.

(C)

(C) Indicates Change

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

2. Released Transmission Capacity Not Included in SATC Transportation Rates

48% of extreme peak day requirements is to be provided by the release of pipeline capacity upstream of NFGSC and the release of associated EFT transportation capacity on NFGSC which is not included in transportation rates. All such capacity shall be released to SATS Suppliers, and SATS Suppliers shall take such released capacity, at the maximum rate under the pipeline's FERC gas tariff. The actual pipeline capacity path upstream of NFGSC to be released to the Supplier by the Company shall be designated by the Company from its available capacity. The Company will attempt to accommodate a Supplier's request for particular capacity on a first-come first-serve basis. (I)

As an alternative to the above, the Company may designate an alternative capacity path(s) from its available capacity. The capacity release rate for the pipeline capacity path released to the Supplier shall be $7.6749/Dth which equals the weighted average demand cost of upstream capacity, however, capacity released on NFGSC will be released at the maximum rate under NFGSC's FERC gas tariff. The Company will post a listing of the alternative capacity path(s) designated, including the associated quantity of capacity, on its web site. (D)

For capacity termination notices, prior to the termination notice date of any capacity contract in this Section C.2., the Company will issue a request for proposals to qualified Suppliers under this tariff to determine if the Company should terminate, renew, or replace such contract, in whole or in part. The Company will terminate a proportionate share of the capacity contract if: (1) Suppliers demonstrate that they will provide comparable firm capacity to serve the Company's core customers, (2) the Suppliers agree to assign such comparable capacity at the contracted price to the Company upon Company request if such capacity is required to meet supply requirements of SATC Customers due to the termination of the SATS Supplier pursuant to Section H.1. or if the Supplier has reduced the level of delivery requirements from the previous periods requirements, and 3) the Commission approves such comparable capacity. Comparable capacity must have firm rights for at least the seven (7) winter months, and such capacity must have primary delivery rights into available primary receipt rights on NFGSC held by the Company. Comparable capacity must have firm capacity rights sufficient in volume and duration (with renewal rights) to serve the customers to be served by the SATS Supplier. The Company will post a listing of capacity contracts, including the associated quantity of capacity, that it determines to be of critical status on its web site.

(D) Indicates Decrease (I) Indicates Increase

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

If the Company terminates capacity included in this Section C.2., the requirement to take released capacity pursuant to this Section C.2. shall be adjusted downward for the Supplier that replaces the terminated capacity to reflect such termination. Corresponding changes will be made in Section C.4.

3. Capacity Upstream of NFGSC Included in Transportation Rates

0% of extreme peak day requirements is to be provided by a SATS Supplier's maximum daily delivery into allocated upstream pipeline receipt points which the Company has retained ("Company Retained Upstream Capacity") and the cost of which capacity is included in transportation rates. The actual pipeline point upstream of NFGSC to be made available to the Supplier by the Company shall be designated by the Company. The Company will respond to requests for particular capacity and receipt points on a first-come first-serve basis and will reallocate capacity each April.

4. SATS Supplier Provided Capacity

0% of the extreme peak day requirements is to be provided by a SATS Supplier's own firm capacity upstream of NFGSC. The percentage provided by SATS Supplier's own firm capacity upstream of NFGSC is subject to increases if the Company terminates capacity as specified in Section C.2. The Supplier shall assign such SATS Supplier capacity to the Company upon Company request if such capacity is required to meet supply requirements of SATC Customers due to the termination of the SATS Supplier pursuant to Section H.1 or if the Supplier has reduced the level of delivery requirements from the previous period requirements. The Company will release to the SATS supplier EFT capacity on NFGSC at the maximum rate under NFGSC's FERC gas tariff equivalent to the peak day requirements to be provided by the SATS Supplier's own firm capacity.

5. NFGSC Capacity Included in Transportation Rates

The Company will deliver all upstream pipeline deliveries associated with Special Provisions Sections C.3 above through the NFGSC EFT capacity retained by the Company and included in transportation rates.

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

D. City Gate Balancing

1. Determination of Daily Delivery Quantities and Aggregate Daily Delivery Quantities

The Company, based upon each SATC Customer's historical load profile and/or estimates of consumption as applied to any forecasted weather, shall determine a SATS Supplier's SATC Customer's projected weather normalized consumption for a given period; either monthly, weekly, or daily. Based upon this projected consumption, actual consumption readings as available and based on the system requirement to manage storage capacity retained by the Company to meet temperature swings, the Company will determine each SATC Customer's Daily Delivery Quantity (DDQ) and the Company will also determine the Supplier's SATC Customer Group's Aggregate Daily Delivery Quantities (ADDQ) by summing all DDQs of the SATC Customers in the Supplier's SATC Customer Group. The DDQs and ADDQ so calculated will be used to determine the Supplier's daily delivery obligations at the Company City Gate. Such ADDQ shall not exceed the capacity available to the SATS Supplier as determined under Special Provisions Sections C1, C2, C3 and C4. The DDQs and ADDQs shall also be used to determine the specific rates and charges as outlined in this rate schedule.

A SATS Supplier taking service under this rate schedule accepts the Company's calculation of the DDQ and/or ADDQ. The Company shall not be liable for the difference between the projected consumption and the consumption determination by the Company.

2. Delivery Requirements

Deliveries of natural gas at the City Gate under this rate schedule both from direct deliveries at the City Gate under Special Provisions Section C.1. and as a result of deliveries to upstream pipeline transfer points made under Special Provisions Sections C.2., C.3., and C.4. shall be made to meet the DDQs for all customers in a SATS Supplier's SATC Customer Group (the ADDQ) within a tolerance band described below. The Company will deliver to each individual SATC Customer the Customer's requirements.

With respect to Appalachian production sources connected directly to the Company's system, 100% of the historical average daily production for the month will be accepted as delivered to the system for meeting DDQ delivery requirements of the SATS Supplier provided that such nominations are prioritized higher than nominations for transportation service under other Rate Schedules. While 100% of the historical daily average shall be made available, gas must be scheduled on a daily basis to be delivered to a SATC Pool in order for volumes to be allocated that day. In no event shall volumes that are not scheduled for delivery to SATS pools be made available as a carryover for nominations to SATC pools on a subsequent day during the month. (C)

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

2. Delivery Requirements (cont'd)

To the extent the Supplier's City Gate deliveries differ from the ADDQ provided to the Supplier by the Company, then a City Gate Imbalance shall occur ("Imbalance") and charges for such Imbalance will be incurred as described below. The Company is not obligated to accept any quantities nominated by Supplier in excess of its SATC Customer Group's ADDQ.

3. City Gate Imbalance Charges

For City gate deliveries by the SATS Supplier that differ from the applicable ADDQ, the Supplier will incur the following charges:

A. Charges for Daily City Gate Underdeliveries

i. For Daily City Gate underdeliveries up to or equal to two (2) percent of the applicable ADDQ, there will be no charge.

ii. For Daily City Gate underdeliveries in excess of two (2) percent of the applicable ADDQ during the Summer Period (April through October), the charge for the gas supplied by the Company to make up for the underdeliveries shall be equal to the higher of $7.00 per Dth or 110% of the DMI for that day plus all transportation costs to the Company's City Gate.

iii. For daily City Gate underdeliveries in excess of two (2) percent of the applicable ADDQ during the Winter Period (November through March), the charge for the gas supplied by the Company to make up for the underdeliveries shall be equal to the higher of $10.00 per Dth or 110% of the DMI for that day plus all transportation costs to the Company's City Gate.

iv. During OFO periods, the charges described in Section G herein shall apply in addition to those charges specified in this Section D.3.

b. Charges for Daily City Gate Overdeliveries

There shall be no charges for Daily City Gate overdeliveries of up to two (2) percent of the applicable ADDQ, however, any such overdeliveries in excess of two (2) percent of the applicable ADDQ may be rejected by the Company in its sole discretion.

E. Burner Tip Imbalances

1. Aggregation of Customer Burner Tip Imbalance

For SATC customers included in the SATS Supplier's SATC Customer Group, the Company will net all the imbalances for which the Supplier is responsible pursuant to this rate schedule into a single monthly imbalance ("SATS Burner Tip Imbalance"). (C)

(C) Indicates Change

Voluntarily Suspended to April 13, 2012

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

2. Resolution of Burner Tip Imbalances

The Company will resolve SATS Burner Tip Imbalances through either a rollover to subsequent months or a cash out pursuant to Rule 30. The default method of Burner Tip imbalance resolution will be the cash out. Should the Company determine that circumstances render resolution of imbalances via cash out operationally infeasible, the Company may, in discretion and upon reasonable notice, suspend the cash out and resolve imbalances through rollover. (C)

a. Rollover Procedure (C)

At the close of the billing month, the Company will calculate the SATS Burner Tip Imbalance, as described above, for each SATC Customer Group. The Company shall adjust the applicable ADDQ for the next following month that operating conditions permit, upward to reconcile a net deficiency in the billing month, or downward to reconcile a net surplus in the billing month. (C)

b. Cash Out Procedure (C)

i. Burner Tip Imbalances Resulting in Net Overdelivery

For SATS Burner Tip Imbalances which result in a net overdelivery of volumes of gas for a SATC Customer Group during the month, the Company shall resolve the imbalance pursuant to Rule 30. (C) (C)

ii. Burner Tip Imbalances Resulting in Net Underdelivery

For SATS Burner Tip Imbalances which result in a net underdelivery of volumes of gas for a SATC Customer Group during the month, the Company shall resolve the imbalance pursuant to Rule 30. (C) (C)

iii. Exchange of Net Burner Tip Imbalances

A Supplier may exchange a SATS Burner Tip Imbalance due the Company under its SATS Service Agreement with a SATS Burner Tip Imbalance due from another Supplier under another SATS Service Agreement or a Supplier under a MMNGS Service Agreement. Exchange of imbalances shall be accomplished pursuant to Rule 30. (C)

(C) Indicates Change

Voluntarily Suspended to April 13, 2012

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

F. System Maintenance Order ("SMO") (C)

1. Issuance of SMOs

The Company shall issue System Maintenance Orders from time to time which assure that gas is flowing to the City Gate where and when needed. Such SMOs shall include but not be limited to orders to deliver gas at any or all of the points obtained by or allocated to Suppliers in Special Provisions Section C.3 above, to deliver gas at particular primary points into NFGSC, or into the particular primary points of the Company Retained Upstream Capacity, as well as orders to deliver additional gas to or from storage. Should SATS Suppliers fail to comply with such SMOs then the Company shall issue OFOs as described below.

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RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

2. Communication of SMOs

SMOs will be communicated to the Supplier through the Company's website with four hours advanced notice. Such notice will be supplemented by the use of internet E-mail notification to a Supplier's Internet address.

3. Access to Upstream Pipeline Information (C)

To monitor compliance with SMOs, the Supplier shall provide the Company with permission to access nomination information. (C)

G. Operational Flow Order ("OFO")

1. Issuance of OFOs

The Company reserves the right to issue Operational Flow Orders as necessary to preserve the operational integrity of its system. Such OFOs may include, but shall not be limited to the following: a requirement to flow gas to or from storage on NFGSC, a reduction in Daily City gate delivery tolerance and a requirement to flow gas to the Supplier's primary receipt points on NFGSC.

2. Charges for Violation of OFOs

In addition to all other charges due the Company, any gas not delivered by SATS Supplier in violation of any OFO issued under this Section G may be assessed a charge of the higher of $25 per Dth or the DMI for that day plus all transportation costs to the Company's City Gate.

3. Communication of OFOs

OFOs will be communicated to the Supplier through the Company's website with four hours advanced notice. Such notice will be supplemented by the use of internet E-mail notification to a Supplier's Internet address.

4. Access to Upstream Pipeline Information (C)

To monitor compliance with OFOs, the Supplier shall provide the Company with permission to access nomination information. (C)

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

H. Termination of Service for Failure to Deliver Daily Quantity

1. The Company shall have the right to terminate service under this rate schedule to any Supplier that fails for any three (3) days to deliver at least ninety (90) percent of the applicable ADDQ for the Supplier's SATC Customer Group, measured during a single thirty day period ("Terminated Supplier"). The Terminated Supplier, at the Company's option, may be prohibited from receiving service under this rate schedule for the greater of 6 months or until such time as another Enrollment Period as defined in Section J.1. is established by the Company. Such Terminated Supplier's SATC Customers will be served by the Company with the obligation that the gas supplies in storage and the capacity reserved for those customers shall be transferred to the Company through sale and recall as follows:

Voluntarily Suspended to April 13, 2012

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

a. Upon notice by the Company to the Terminated Supplier, the Company at its option may recall the capacity that it has released to the Terminated Supplier; and or require release of the Supplier's capacity as provided under section C.4.

b. Inventory remaining in storage shall be sold to the Company at a price equal to the Company's lowest monthly weighted average commodity cost experienced over the last twelve months.

c. The Terminated Supplier shall be responsible for any and all fees and taxes associated with moving or transferring the storage inventory to the Company.

d. Any failure to comply with the provisions under Sections H.1.a., H.1.b., H.1.c., and C.4. will result in the permanent ineligibility to receive service under this Rate Schedule.

e. Supplier's SATC customers may be notified by the Company as to the impending transfer to Company service, together with a statement that the transfer is the result of the Supplier's failure to perform as required. The Company shall recover the cost of such notice from the Supplier by either, (1) adjusting the inventory sales price described in Section H.1.b., or (2) drawing down the Supplier's security deposit (or other security instrument.

I. Supplier Qualification Criteria

1. Pursuant to 52 Pa. Code Chapter 62, Company may request and adjust security from Supplier and service under this rate schedule is contingent upon the SATS Supplier meeting and maintaining the creditworthiness standards. (C)

Applicants for service hereunder will be required to complete a Credit application for evaluation by the Company based on the criteria set forth in this tariff. The results of the creditworthiness checks performed by the Company will be communicated to the applicant within two weeks of the Company's receipt of the properly completed application.

2. The SATS Supplier's application shall include a description of the SATS Supplier's operational capability for meeting the requirement of its SATC Customer Group. The company shall then make a determination as to whether this capability is sufficient.

3. SATS Suppliers shall also describe in the application the means by which they will handle marketing and billing for 50 or more customers. Alternatively, SATS Suppliers may identify a third party, including the Company, in the case of the NGS' use of POR billing, and describe how such party will handle such tasks. Suppliers or their third party representative included in the Company's Purchase of Receivable Program must abide by the Company's Marketing Standards. The Company shall then make a determination as to whether this capacity is sufficient.

Suppliers serving customers with annual consumption less than 1,000 Mcf/year participating in the Company's POR program will be required to use the Company's Utility Consolidated Billing System and enter into the Billing Services Agreement.

(C) Indicates Change

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

4. SATS Suppliers shall include with their application payment of a non-refundable $500 fee.

5. SATS Suppliers shall also include with their application a copy of their intended pro forma contract for their prospective SATC Customers (minus confidential pricing provisions) demonstrating inclusion of the provisions set out in Section K herein.

J. SATS Supplier Obligations

1. Suppliers may enroll customers for service commencing with the SATC Customer's meter reading in any month. Service to the SATC Customer shall begin at the start of the customer's billing cycle after enrollment confirmation has been provided by the Company.

2. Once qualified, SATS Suppliers will be obligated to notify the Company on a weekly basis during the Enrollment Period of those customers enrolled in the Suppliers' SATC Customer Groups.

3. When a customer requests to change its SATS Supplier, upon receiving direct oral confirmation or written authorization to change the SATS Supplier, the customer's new SATS Supplier shall notify the Company by the end of the next business day following completion of the application process.

4. Enrollment shall occur electronically, however, each SATS Supplier will be obligated to keep on file either oral or written evidence of each customer's enrollment with that Supplier, which evidence shall be available for Company review at any time, upon 24 hours' notice. The Company will provide the SATC Customer with a letter confirming enrollment, if the Customer notifies the Company within the time period prescribed by Order of the Commission or, in the same absence of same, as specified per 52 Pa. Code §59.93 - §59.94) of issuance of the confirmation letter that the Customer does not wish to be served by the SATS Supplier, the enrollment for the Customer will be rescinded. (C)

5. To the extent a SATS Supplier's SATC Customer at any time is not served any longer by that SATS Supplier and is then the responsibility of the Company, effective upon the transfer of that customer to the Company, the Company shall have the option to recall capacity released to the Supplier under Special Provisions Section C.1 and C.2 or require assignment of capacity under Special Provisions Section C.4.

6. Any customer may identify persons authorized to make changes to the customer's account. To accomplish this, the customer provides the Company with a signed document identifying by name those persons who have the authority to initiate a change of the customer's SATS Supplier. A document signed by the customer whose sole purpose is to obtain the customer's consent to change natural gas suppliers shall be accepted as valid and result in the initiation of the customer's request. Documents not considered as valid include, but are not limited to, canceled checks, signed entries into contests and documents used to claim prizes won in contests.

(C) Indicates Change

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

7. SATS Suppliers agree to abide by any other specific requirements in the Company's Aggregation Application as such is approved by the Public Utility Commission.

K. Consumer Protections

In addition to satisfying the criteria set out in Sections I and J above, SATS Suppliers seeking to obtain service hereunder to sell gas to customers must demonstrate to the Company that they will meet the following requirements:

1. Contracts between SATS Suppliers and residential SATC Customers will contain specific language advising customers that the following consumer protections (Sections K.2-5.) will be provided by the Supplier.

2. The SATS Supplier has established a dispute resolution process satisfactory to the Company. Questions or complaints received by the Company will be processed to determine the nature of the dispute, and then forwarded as appropriate to the SATS Supplier. The Company shall provide the Commission's Competition Hotline phone number to each SATC Customer who has submitted a question or complaint concerning the SATS Supplier.

3. Suppliers serving customers with annual consumption less than 1,000 Mcf/year participating in the Company's POR program will be required to use the company's Utility Consolidated Billing System and enter into the Billing Services Agreement. For SATS Suppliers not using the company's Utility Consolidated Billing System, the bills rendered by the SATS Supplier will be clear and in plain language and shall meet the billing information requirements of Chapter 56 of the Commission's regulations, including the requirement that bills contain a statement directing the customer to "register any question or complaint about the bill prior to the due date," with the Company telephone number where the customer may initiate the inquiry or complaint. The Supplier shall submit a sample bill to the Company. (C)

4. The SATS Supplier performing its own billing shall provide SATC Customers with minimum payment periods required by the Commission's regulations; i.e. residential customers shall have 20 days to pay and commercial customers shall have 15 days. If a customer fails to pay by the due date, the Supplier shall notify the SATC Customer by mail that failure to pay will result in transfer to the Company upon a minimum of 15 days, whereupon the Company has the ability to terminate service for non-payment in accordance with the Commission's regulations. (C) (C)

(C) Indicates Change

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

5. Procedures are in place to ensure residential SATC Customers receive adequate prior notice of termination of gas supply services. The procedures must provide that notifications be sent to the residential SATC Customer(s) and to the Company at least 15 days before discontinuation of supply service to allow residential SATC Customers the opportunity to pay the overdue bill. Customers will only be transferred from a Supplier to the Company upon the "Control Date" for such customer, as such is established by the Company. The Company will be allowed to terminate customers participating in the Company's POR program for non-payment of SATC supplies pursuant to Rate Schedule SATC Section F ("Lesser Of" calculation). (C)

6. For SATS Suppliers exiting the program ("Exiting Suppliers") and who intend to no longer serve SATC Customers, in addition to those protections noted in Section K.5, such Exiting Suppliers shall provide written notice to its SATC Customers and the Company sixty (60) days before it exits. The notice shall include information regarding the SATC Customers' ability to choose another SATS Supplier or return to the Company's sales service, assurances service will be provided by the Company and information regarding payment of their first bill. (C)

7. SATS Suppliers will abide by the Company's Marketing Standards specifically involving marketing efforts that involve uninvited personal visits to customers' homes or places of business, also known as door-to-door sales. (C)

(C) Indicates Change

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

L. SATS Service Agreement

The initial term of the SATS Service Agreement between the Company and the SATS Supplier shall be for an annual period ending March 31 and renewable annually for successive one-year terms unless canceled by default of any terms or conditions hereof, or by the Company or the Supplier on sixty (60) days written notice prior to the end of a term, or otherwise by mutual agreement. A SATC Customer shall be obligated to contract with Suppliers for terms ending with the customer's April billing cycle. Notice for termination of such contracts shall be a matter to be determined by the SATS Supplier and SATC Customer.

M. Force Majeure

SATS Supplier will be excused from delivering the required daily quantity of supply on any given day for Force Majeure events which directly and substantially affect a SATS Supplier's natural gas deliveries to the Company and for which alternate supply arrangements cannot be obtained by SATS Supplier or, if the SATS Supplier is unsuccessful in obtaining alternate supplies, for which the Company cannot obtain supplies on behalf of the SATS Supplier. For supplies provided by the Company, the SATS Supplier shall be charged the higher of 125% of the Residential purchased gas cost (commodity and demand) identified in Rider A or the highest DMI during the month plus all transportation costs to the Company's City Gate for each day such (C)
alternate supplies are delivered on behalf of SATS Supplier. For purposes of this rate schedule, a Force Majeure event will be any failure of the final pipeline delivering gas to the Company or an upstream pipeline feeding such pipeline, with such failure having been classified as a Force Majeure event pursuant to the terms of that pipeline's Federal Energy Regulatory Commission approved tariff. A Force Majeure event that curtails the SATS Supplier's (C)
assigned firm transportation service on an upstream pipeline that ultimately feeds a downstream pipeline, which directly and substantially affects a SATS Supplier's natural gas deliveries to the Company, and for which no alternative supplies are available from the Company or other sources will excuse a SATS Supplier from performing pursuant to this rate schedule to the extent of such curtailment. If at such time the SATS Supplier is delivering gas to other customers on the same interstate pipeline system, the volume excused from performance on the Company's system will be no more than a proportionate amount of the affected deliveries curtailed by the Force Majeure event. The SATS supplier is responsible for supplying complete information and verifiable proof of all the particulars requested by the Company related to any such Force Majeure exclusion.

(C) Indicates Change

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

In order to validate a claim of Force Majeure, the SATS Supplier must have a firm, non-interruptible service with the affected pipeline that is covered by the Force Majeure event and must be willing to present such agreements to the Company.

Volumes not delivered pursuant to this Special Provision must be made up by SATS Supplier as soon as possible at a delivery rate to be established by the Company. Any curtailed volumes which are not made-up within thirty (30) days will be sold to SATS Supplier at a rate of $10.00 per Mcf.

N. Title to Gas

Supplier warrants that, at the time of delivery of gas to the Company's City Gate or at the receipt point in to the Company Retained Upstream Capacity pursuant to Special Provisions Section C.3., Supplier or Customer shall have good title to deliver all volumes made available.

O. Control and Possession

After Supplier delivers gas or causes gas to be delivered to the Company, the Company shall be deemed to be in control and possession of the gas until it is redelivered to the Customer at Customer's meter.

P. 24 Hour Availability

Supplier shall include on the SATS Service Agreement a phone number by which Supplier can be reached on a twenty-four (24) hour basis.

Q. Nominations of Supplies

For deliveries into Company Retained Upstream Pipeline Capacity pursuant to Section C.3., Supplier shall notify the Company through the Company's web site one hour in advance of the deadline the Company has to submit nominations to upstream transporters of any and all information required by upstream transporters to nominate, confirm and schedule gas on their facilities. (C)

R. Service Quality Guidelines

Suppliers shall adhere to the Public Utility Commission standards for credit determination, deposits, initiation and discontinuation of service as specified in the Public Utility Commission's Maintaining Service Quality Guidelines at Docket No. M-00991249F0003.

S. Customer Information Disclosure Guidelines

Suppliers shall adhere to the Public Utility Commission standards related to disclosure of terms of service, marketing, advertising and sales practices, and privacy of customer information as specified in the Public Utility Commission's Customer Information Disclosure Guidelines at Docket No. M-00991249F0005.

(C) Indicates Change

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

T. Billing in the Event of a SATS Supplier Default

In the event of a default or discontinuance by a SATS Supplier, the Company will charge the customer the rate agreed to by the SATS Supplier and the customer for the remainder of the billing period, provided that the Company either has available or is provided the agreed upon rate by the Supplier or the Commission, and the Company will recover any difference between its costs and the SATS Supplier rate charged to the customer solely from the SATS Supplier or its bond or other security.

U. Standards of Conduct

The Company and Suppliers shall comply with the following requirements.

1. The Company shall apply its tariffs in a nondiscriminatory manner to its affiliated Supplier and any nonaffiliated Supplier.

2. The Company shall not apply a tariff provision in any manner that would give its affiliated Supplier an unreasonable preference over other Suppliers with regard to matters such as scheduling, balancing, transportation, storage, curtailment, capacity release and assignment, or nondelivery, and all other services provided to its affiliated Supplier.

3. Mandatory tariff provisions shall not be waived by the Company for any Suppliers absent prior approval of the Commission.

4. If a tariff provision is not mandatory or provides for waivers, the Company shall grant the waivers without preference to its affiliated Supplier or non-affiliated Supplier.

5. The Company shall maintain a chronological log of tariff provisions for which it has granted waivers. Entries shall include the name of the party receiving the waiver, the date and time of the request, the specific tariff provision waived and the reason for the waiver. The chronological log shall be open for public inspection during normal business hours.

6. The Company shall process requests for distribution services promptly and in a nondiscriminatory fashion with respect to other requests received in the same or a similar period. The Company shall maintain a chronological log showing the processing of requests for transportation services. The chronological log shall be open for public inspection during normal business hours.

7. If the Company provides a distribution service discount, fee waiver or rebate to its favored customers, or to the favored customers of its affiliated Supplier, the Company shall offer the same distribution service discount, fee waiver or rebate to other similarly situated customers. Offers shall not be tied to any unrelated service, incentive or offer on behalf of either the Company or its affiliated Supplier. A chronological log shall be maintained showing the date, party, time and rationale for the action. The chronological log shall be open for public inspection during normal business hours.

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

8. Subject to customer privacy or confidentiality constraints, the Company shall not disclose, directly or indirectly, any customer proprietary information to its affiliated Supplier unless authorized by the customer. To the extent that the Company does disclose customer information without customer authorization, it shall contemporaneously provide this same information to other similarly situated Suppliers in a similar fashion so as not to selectively disclose, delay disclosure, or give itself or its affiliated Supplier any advantage related to the disclosure. A chronological log shall be maintained showing the date, time and rationale for the disclosure. The chronological log shall be open for public inspection during normal business hours.

9. The Company shall justly and reasonably allocate to its affiliated Supplier the costs or expenses for general administration or support services provided to its affiliated Supplier.

10. The Company shall not condition or tie the provision of any product, service or price agreement by the Company (including release of interstate pipeline capacity) to the provision of any product or service by its affiliated Supplier.

11. The Company shall not give its affiliated Supplier preference over a non-affiliated Supplier in the provision of goods and services including processing requests for information, complaints and responses to service interruptions. The Company shall provide comparable treatment in its provision of such goods and services without regard to a customer’s chosen Supplier.

12. The Company and its affiliated Supplier shall maintain separate books and records. Further, transactions between the Company and its affiliated Supplier shall not involve cross-subsidies. Any shared facilities shall be fully and transparently allocated between the Company function and the affiliated Supplier function. The Company accounts and records shall be maintained such that the costs incurred on behalf of an affiliated Supplier may be clearly identified.

13. The Company employees who have responsibility for operating the distribution system, including natural gas delivery or billing and metering, shall not be shared with an affiliated Supplier, and their offices shall be physically separated from the office(s) used by those working for the affiliated Supplier. Such the Company employees may transfer to an affiliated Supplier provided such transfer is not used as a means to circumvent these interim standards of conduct.

14. Neither the Company nor its affiliated Supplier shall directly or by implication, falsely and unfairly represent to any customer, Supplier or third party that an advantage may accrue to any party through use of the Company’s affiliates or subsidiary, such as:

a. That the Commission regulated services provided by the Company are of a superior quality when services is purchased from its affiliated Supplier; or

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

b. That the merchant services (for natural gas) are being provided by the Company when they are in fact being provided by an affiliated Supplier;

c. That the natural gas purchased from a non-affiliated Supplier may not be reliably delivered;

d. That natural gas must be purchased from an affiliated Supplier to receive Commission regulated services.

15. When the affiliated Supplier markets or communicates to the public using the Company name or logo, it shall include a legible disclaimer that states:

a. That the affiliated Supplier is not the same company as the Company;

b. That the prices of the affiliated Supplier are not regulated by the Commission; and

c. That a customer does not have to buy natural gas or other products from the affiliated Supplier in order to receive the same quality service from the Company.

When an affiliated Supplier advertises or communicates verbally through radio or television to the public using the Company name or logo, the affiliated Supplier shall include at the conclusion of any such communication a legible disclaimer that includes all of the disclaimers listed in this paragraph.

16. Except in competitive bid situations the Company shall not (a) jointly market or jointly package its Commission regulated services with the services of an affiliated Supplier or (b) offer or provide to its affiliated Supplier products or services, including bill inserts in the Company bills promoting an affiliated Supplier’s services or a link from the Company’s web-site, unless the Company offers or provides the products or service to all non-affiliated Suppliers on the same terms and conditions.

17. The Company shall not offer or sell natural gas commodity or capacity to its affiliated Supplier without simultaneously posting the offering electronically on a source generally available to the market or otherwise making a sufficient offer to the market. The Company shall maintain a chronological log of these public disseminations. The chronological log shall be open for public inspection during normal business hours.

18. The Company shall keep a chronological log of any complaints, excepting paragraph 9, regarding discriminatory treatment of Suppliers. This chronological log shall include the date and nature of the complaint and the resolution of the complaint. The chronological log shall be open for inspection during normal business hours.

19. Dispute Resolution Procedures (with the exception of paragraph 9, which are exclusively under the purview of the Commission):

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

a. Any dispute between a Supplier, and/or an affiliated Supplier, and a non-affiliated Supplier alleging a violation of any of these Standards of Conduct provisions, the Supplier must provide the Company and/or affiliated Supplier, as applicable, a written Notice of Dispute that includes the names of the parties and customer(s), if any, involved and a brief description of the matters in dispute.

b. Within five (5) days of the Company's and/or affiliated Supplier's receipt of a Notice of Dispute, a designated senior representative of each of the parties shall attempt to resolve the dispute on an informal basis.

c. In the event the designated representatives are unable to resolve the dispute by mutual agreement within thirty (30) days of said referral, the dispute shall be referred for mediation through the Commission's Office of Administrative Law Judge. A party may request mediation prior to that time if it appears that informal resolution is not productive.

d. If mediation is not successful, then the matter shall be converted to a formal proceeding before a Commission Administrative Law Judge.

e. Any Party may file a complaint concerning the dispute with the Commission under relevant provisions of the Public Utility Code.

f. Parties alleging violations of these standards may pursue their allegations through the Commission's established complaint procedures. A complainant bears the burden of proof consistent with 66 Pa. C.S. §332 (relating to Public Utility Code) in regard to the allegations and may impose penalties for such violations pursuant to 66 Pa.C.S.§ 3301.

V. Customer Dispute Procedures Relating to Unauthorized Changes of Suppliers.

1. When a customer contacts Company or a Supplier and alleges that his/her Supplier has been changed without consent, the party contacted shall:

a. Consider the matter a customer registered dispute.

b. Investigate and respond to the dispute consistent with the requirements found in §§56.151 and 56.152 (relating to utility company dispute procedures).

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

2. When the customer's dispute has been filed within the first two billing periods since the customer should reasonably have known of a change of Suppliers and the dispute investigation establishes that the change occurred without the customer's consent, the customer shall not be responsible for any Supplier charges rendered during that period. If the customer has made payments during this period, the Supplier responsible for initiating the change of supplier shall issue a complete refund within 30 days of the close of the dispute. The refund or credit provision applies only to the natural gas supply charges.

3. A customer who has had a Supplier changed without having consented to that change shall be switched back to the original Supplier for no additional fee. Any charges involved in the switch back to the prior Supplier shall be the responsibility of the Supplier that initiated the change without the customer's consent.

4. Should a customer file an informal complaint with the Commission alleging that the customer's Supplier was changed without the customer's consent, the Bureau of Consumer Services will issue an informal decision that includes a determination of customer liability for any Supplier bills or administrative charges that might otherwise apply, rendered since the change of the Supplier.

5. The provisions of this section do not apply in instances when the customer's service is discontinued by the Supplier and subsequently provided by the Company because no other Supplier is willing to provide service to the customer.

6. Company and Suppliers shall preserve all records relating to unauthorized change of Supplier disputes for a period of three years from the date the customers filed the dispute. These records shall be made available to the Commission or its staff upon request.

W. Data Security Agreement

Marketers, suppliers, and agents shall execute a Data Security Agreement pursuant to Tariff Rule 33. (C)

RATE SCHEDULE FOR DAILY METERED LARGE MANUFACTURING TRANSPORTATION SERVICE

DEFINITIONS

(1) Gas Service Customer - A Gas Service Customer is an entity that is attached to the Company's lines and uses gas in its operations or in its premises;
(2) DMLMT - Daily Metered Large Manufacturing Transportation
(3) DMLMT Service Customer - Any entity that has executed a DMLMT Service Agreement with the Company for transportation of gas by the Company.

AVAILABILITY OF SERVICE

If all of the qualifications (a) through (e) set forth below are met, any entity will be considered a DMLMT Service Customer under this Rate Schedule.

(a) The entity that will receive gas transported by the Company has a volumetric requirement of at least 2 Bcf per year

(b) A DMLMT service agreement must be executed by the DMLMT Service Customer in the form prepared by the Company (the "Service Agreement");

(c) The DMLMT Service Customer has obtained, or has agreed to obtain, a supply of gas, of a quality acceptable to the Company, from any source of gas;

(d) The DMLMT Service Customer has made, or has caused to be made, arrangements by which such volumes of gas can be delivered, either directly or by displacement, on a firm or interruptible basis, into the Company's distribution system; and

(e) If facilities are required for furnishing of DMLMT service, in addition to facilities that are required for furnishing of gas service, to a Gas Service Customer, the DMLMT Service Customer shall have paid, in full, for any additional facilities required to be constructed for furnishing of DMLMT service, which payment shall not

be subject to refund under any circumstances. As deemed necessary by the Company in its sole discretion, the DMLMT customer shall be required also to pay, in full, for costs of installing daily metering and communications equipment selected by the Company which will enable the Company to obtain each day meter readings of the volume of gas delivered to the Company or to another point or points acceptable to the Company for the Customer's account and the volume of gas from the Company used by the Customer each day. In addition, with regard to daily metering and communications equipment, the Customer shall pay an amount of money to provide for recovery of the present value of the carrying cost of income taxes on the payment for daily metering and communications equipment. Such carrying cost arises from the delay between federal and Pennsylvania income taxation and income tax deductions over the tax life of the equipment and a further amount equal to 72.67% of the carrying cost (based on present income tax rates). If additional facilities are required for furnishing of gas service, Customer's payment for additional facilities required for furnishing of gas service shall be governed by Tariff Rule No. 3, "Extension of Facilities", and Tariff Rule No. 5, "Service Lines."

CHARACTER OF SERVICE

Gas, of a quality acceptable to the Company, owned by a DMLMT Service Customer and delivered, either directly or by displacement, into the Company's distribution system, will be transported, by the Company, to the delivery point designated by the DMLMT Service Customer.

TERM OF SERVICE AGREEMENT

If the requirements of this Rate Schedule are met, the Company shall enter into a Service Agreement with the customer for a term that will be established in the Service Agreement. However, the Company may terminate a Service Agreement at an earlier date as provided by law or the provisions of this Tariff.

RATE SCHEDULE FOR DAILY METERED LARGE MANUFACTURING TRANSPORTATION SERVICE
(cont'd)

MONTHLY RATES

For transportation of gas to Large Industrial Manufacturing Customers, the monthly rate for transportation shall be:

$0.5993 per Mcf.

Provided, however, that the Company, in its sole discretion, may reduce by contract the portion of the above rates applicable to the Customer that is for recovery of gas costs or the portion of the rate for recovery of non-gas costs of service if it is reasonably necessary to do so to meet competition from another supplier of energy including gas from another supplier of gas that has constructed, or could construct, facilities to deliver supplies of gas to a Gas Service Customer of the Company without use of the Company's facilities or another transportation of gas. The Company will reduce the applicable rate only if:

(a) Either (1) the Customer has facilities in place and operable to use an alternative fuel or obtain gas from an alternative supplier or (2) in the Company's judgment, such facilities would be constructed;

(b) Volumes of gas that would be transported by the Company would be displaced by an alternate fuel or an alternative source of gas unless the Company reduces its transportation rate;

(c) The Company will not reduce the rate for transportation service below the level necessary to transport gas; and

(d) In the Company's judgment the DMLMT Service Customer has taken all reasonable steps to minimize the cost of gas supplies delivered to the Company's system in order to help meet competition.

Where the above criteria are met, the Company may, in its discretion enter into an agreement setting either: (1) a fixed transportation rate or (2) the basis for determining the transportation rate, for the period of the Service Agreement, which will specify which portion of the rate is being reduced.

Volumes delivered as transportation service pursuant to this rate schedule shall be subject to State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge (C)

CHARGES FOR TRANSPORTATION BY OTHERS

If furnishing service, pursuant to this Rate Schedule, requires the use of a transportation service provided other than by the Company, any cost incurred by the Company, with regard thereto, shall be billed to DMLMT Service Customer by the Company.

CHARGES UNDER OTHER RATE SCHEDULES

The Gas Service Customer receiving gas transported by the Company under this rate schedule shall pay all charges under all other applicable rate schedules and riders, irrespective of whether such Customer, in any billing period, receives only gas transported by the Company, and such Customer shall pay rates under all other applicable rate schedules for any service furnished to the Customer in addition to transportation service under this Rate Schedule. The DMLMT Customer shall be charged the customer charge under Rate Schedule LIS. The Customer may receive service under Rate Schedule LIS if the Customer so requests and the Company has sufficient gas supply available, and other customers or the Company would not be harmed by the Company providing this service to the Customer.

CHARGES FOR OVERDELIVERIES

As used in this Rate Schedule, "overdeliveries" shall mean the cumulative amount by which the volume of gas delivered to the Company for the Customer's account, since the commencement of transportation service by the Company for the Customer under any rate schedule, after adjustment for line losses and after elimination of volumes purchased from the Customer by the Company, exceeds the total amount of transportation service volumes taken by the Customer from the Company under any rate schedule since the commencement of transportation service for the Customer by the Company. Such cumulative overdelivery balance shall be computed each day, and the rates set forth below shall be applied to the maximum daily overdelivery volume occurring during the billing month.

If the DMLMT Service Customer in any billing month has overdeliveries in excess of two percent of the volume of gas transported for the customer in the billing month, the Customer shall be subject to additional charges each billing month. For a maximum daily overdelivery volume up to 37% of the volume of DMLMT service gas transported to the Customer by the Company in the billing month, the charge for overdeliveries shall be $0.6351 per Mcf in excess of two percent of the volume of gas transported for the customer in the billing month.

For overdeliveries equal to or more than 37% of the volume of DMLMT service gas transported to the Customer by the Company during the billing month, the charge for such excess overdeliveries shall be $0.7624 per Mcf.

The Company may reduce or eliminate the overdelivery charges and may modify the operational flow order’s and daily delivery quantity (“DDQ”) requirements of customers receiving service under this rate schedule in order to meet the competitive circumstances for alternative fuels or bypass situations as set forth in this Service Classification.

OPERATIONAL FLOW ORDERS

The Company may also issue OFOs which apply to transportation customers receiving service under this rate schedule as follows:

A Restriction on Access to Daily Metered Imbalances

OFOs may be issued to customers receiving service under this rate schedule to assure that adequate supplies are delivered to the Company. During such period, DMLMT customers shall not be permitted to use banked gas to cover daily underdeliveries in excess of the 2% tolerance during the term of the OFO. Furthermore, in the event an OFO is issued, metered usage in excess of 102% of confirmed deliveries on behalf of the DMLMT customer to Distribution's city gate, less line loss, shall be deemed a sale of gas by the Company to the customer. All provisions related to the price for such sales, including charges under Rate SB-Standby Service, shall apply.

B. Waiver of Overdelivery Charges

The Company may, in its discretion, waive DMLMT overdelivery charges during or following colder than normal periods and to waive undelivery premiums during or following warmer than normal periods.

MAXIMUM DAILY QUANTITY

The "Maximum Daily Quantity" shall be the maximum volume of gas, expressed in Mcf, as set forth in a DMLMT Service Customer's Service Agreement, may be delivered into the Company's distribution system, during any twenty-four hour period, for transportation by the Company to such Customer as transportation service under this rate schedule. The Company, in its sole discretion and upon request of a DMLMT Service Customer, may agree to receive and to transport, during any twenty-four period, a volume in excess of the Maximum Daily Quantity as set forth in a transportation Service Customer's Service Agreement. During any hour of any twenty-four hour period, the Company shall not be required to receive and to transport more than 1/24 of the Maximum Daily Quantity as set forth in a Transportation Service Customer's Service Agreement.

BILLING

Monthly charges, for transportation service pursuant to this rate schedule, are subject to the Late Payment Charges set forth in Section 16 of the Rules and Regulations of this Tariff.

SPECIAL PROVISIONS

A. The volume of gas delivered into the Company's distribution system, on any day in behalf of Transportation Service Customers for transportation service pursuant to this Rate Schedule, shall be determined by meters and as provided in B, below, at the delivery points specified in the Service Agreement or to another point or points acceptable to the Company.

If any such point of delivery is also a point at which the Company buys or exchanges gas for the Company's own account through the same meter, the volume of gas delivered into the Company's distribution system, in behalf of Transportation Service Customers for transportation service, shall be deemed to be the volume scheduled by the Company and such Customers to be delivered in behalf of such Customers, at such point on such day, determined after the adjustment provided in B, below, but shall not be more than the total amount actually delivered, determined after the adjustment provided in B below, through such meter into the Company's distribution system at such point on such day.

B. To compensate for line losses, the volume of gas delivered into the Company's distribution system, shall be determined for purposes of this Rate Schedule to be equal to the greater of 99.5% of the amount indicated by a meter at the point of delivery into the Company's distribution system or the rate as set forth in Rate Schedule DMT Special Provisions B, Page No.116; provided however, that, where the only Company facilities involved in transporting gas to the Gas Service Customer are meters, meter installations, house regulators, house regulator installations and industrial measuring and regulating station equipment, no amount shall be deducted as compensation for line losses. (C)

C. Service under this Rate Schedule may be interrupted during periods of supply shortages but only based upon the schedule of priority of curtailment set forth in section 26 of the Rules and Regulations of this tariff.

D. Transportation service under this Rate Schedule may be interrupted or curtailed whenever, in the event of a sudden and unforeseen supply deficiency, the Company invokes emergency curtailment provisions under Tariff Rule 26.

(C) Indicates Change

E. In the event of interruption or curtailment of transportation service, pursuant to items C and D, above, and during such period of interruption or curtailment, the DMLMT Service customer must sell to the Company all or a portion of the DMLMT Service Customer's supply of gas at the higher of (1) the Transportation Service Customer's cost of purchased gas at the point of delivery to the Company or (2) the Company's average cost of purchased gas per Mcf, as determined based upon the Company's Section 1307(f) Rate which is $5.4664. (D)

F. If a Gas Service Customer receiving gas transported by the Company uses less than the amount of gas delivered into the Company's system for transportation to such Customer ("excess deliveries"), the Gas Service Customer receiving gas transported by the Company may use such gas during the banking/balancing period defined below, following which the Company shall have the right, but not the obligation, to purchase remaining excess deliveries of gas from the DMLMT Service Customer at a rate equal to the lowest of (1) the cost at which it was acquired by the DMLMT Service Customer, including pipeline transportation charges, or (2) the Company's average commodity delivered cost of gas to National Fuel Gas Supply Corporation, or (3) the Company's average commodity cost of locally-produced gas during the month when excess deliveries were received by the Company. The cost at which the DMLMT Service Customer acquired the gas will be determined from such Customer's contract with the supplier or by a sworn affidavit setting forth the Customer's cost of gas, including cost of delivery of such gas to the Company's system. Upon request by the Company, the DMLMT service Customer will be required to furnish to the Company the DMLMT Service Customer's choice of (1) a copy of this contract or (2) an affidavit. The banking/balancing period shall be the three billing months after the billing month in which the Company received excess deliveries in behalf of the Customer.

G. "Underdeliveries" are volumes of gas taken from the Company by a Gas Service Customer in excess of the sum of (1) any excess deliveries of the customer at the beginning of the day and (2) the volume of gas delivered to the Company for the customer's account, after adjustment for line losses less volumes of gas determined to be sales by the Company to the customer. Cumulative underdeliveries, as determined each day, in excess of two percent of the volume of gas delivered by the Company to the customer that day, shall be a sale of gas by the Company to the customer under the applicable rate schedule plus applicable surcharges as set forth in Rate Schedule SB Special Provisions and shall not be recharacterized as transportation service under any circumstances. Cumulative underdeliveries of not more than two percent of the volume of gas delivered to a customer by the Company on any day may be offset by volumes of gas delivered to the Company for the customer's account, after adjustment for line losses, in excess of the volume of gas taken by the customer from the Company on subsequent days within the same billing month.

H. Service under this rate schedule shall be available only to the extent that there is sufficient capacity for such service in those portions of the Company's system affected by providing of transportation service including but not limited to, that portion of the Company's system where gas is delivered to the Company and that portion of the Company's system where gas is delivered to the Customer. In determining the Company's ability to provide transportation service, sufficient capacity in the Company's system shall be assumed. If service shall not be supplied, based upon insufficient capacity, the burden shall be on the Company to prove the capacity limitation.

I. Where gas is received by the Company for transportation service pursuant to this Rate Schedule, title to such gas shall remain vested in the Transportation Service Customer for which such gas was received for transportation. The Company's furnishing transportation service for a Transportation Service Customer shall be complete upon delivery of gas received for transportation service, except as provided in E and F, above.

J. The Company shall not be liable, under any circumstances or in any respect, to a Gas Service Customer, Transportation Service Customer, a producer of gas or any other person or entity for damages arising either directly or indirectly from interruption, curtailment or termination of transportation service.

K. Revenues produced by charges to DMLMT customers for overdeliveries of transportation gas to such customers shall be treated in accordance with Paragraph (b)(11) of Rider "A".

L. Customers who contract for transportation service under this Rate Schedule shall have the right thereafter to purchase gas from the Company only to the extent that they have contracted for firm service under Rate Schedule SB for Standby Service. Purchases of gas from the Company by transportation service customers under this rate schedule shall be subject to both the charges under the applicable sales rate schedule and all provisions of the Rate Schedule SB, including the Special Provisions.

M. The Company may establish a BTU conversion factor in the DMLMT service agreement for volumes of gas to be received by the Customer at a factor different from the system average BTU conversion factor applied to other transportation customers.

N. Customers who elect to schedule their own gas supplies via Company's internet accessible Transportation Scheduling System and/or wish to access and/or obtain each day meter readings of the volume of gas delivered to the Company for the Customer's account and the volume of gas from the Company used by the Customer each day shall execute a Data Security Agreement pursuant to Tariff Rule 33. (C)

(C) Indicates Change

RIDER A
SECTION 1307(F) PURCHASED GAS COSTS
PROVISION FOR RECOVERY OF PURCHASED GAS COSTS

Rates for each Mcf (1,000 cubic feet) of gas supplied under Residential, Low Income Residential Assistance Service, Commercial and Public Authority, Commercial and Public Authority Load Balancing Service ("LBS"), Small Volume Industrial, Intermediate Volume Industrial, Intermediate Volume Industrial LBS, Large Industrial, Large Industrial LBS, Large Volume Industrial, Large Volume Industrial LBS and Natural Gas Vehicle Service rate schedules of this tariff, shall include $3.3670 per Mcf for recovery of purchased gas commodity costs, calculated in the manner set forth below, pursuant to Section 1307(f) of the Public Utility Code. (D)

Rates for each Mcf (1,000 cubic feet) of gas supplied under Residential, Commercial and Public Authority, Small Volume Industrial Service, Intermediate Volume Industrial, Large Volume Industrial Service, Large Industrial Service and Standby Service rate schedules of this tariff, shall include $1.8700 per Mcf for recovery of purchased gas demand costs, calculated in the manner set forth below, pursuant to Section 1307(f) of the Public Utility Code. (I)

Rates for each Mcf (1,000 cubic feet) of gas transported under the Small Aggregation Transportation Customer Rate Schedule shall include $0.4453 per Mcf for the recovery of purchased gas demand costs. (D)

Such rates for gas service shall be increased or decreased, from time to time, as provided by Section 1307(f) of the Public Utility Code and the Commission's regulations, to reflect changes in the level of purchased gas costs.

The amounts per Mcf for recovery of purchased gas costs (commodity and demand) included in rates under each rate schedule of the tariff are as follows:

	Distribution		Gas Adjustment	Natural Gas	
	Total	Charges	Charge	Supply Charge	
Residential	$5.6823	$0.4453	$0.2036	$5.0334	(D)
Low Income Residential Assistance Service	$5.6823	$0.4453	$0.2036	$5.0334	(D)
Commercial/Public Authority	$5.6823	$0.4453	$0.2036	$5.0334	(D)
Small Volume Industrial	$5.6823	$0.4453	$0.2036	$5.0334	(D)
Intermediate Volume Industrial	$5.6823	$0.4453	$0.2036	$5.0334	(D)
Large Volume Industrial	$5.6823	$0.4453	$0.2036	$5.0334	(D)
Large Industrial	$5.6823	$0.4453	$0.2036	$5.0334	(D)
Standby	$0.5980				(D)
Priority Standby	$1.2745				(D)
Small Aggregation Transportation Customer Rate Schedule	$0.4453	$0.4453			(D)

(I) Indicates Decrease (I) Indicates Increase

RESERVED FOR FUTURE USE

RESERVED FOR FUTURE USE

COMPUTATION OF PURCHASED GAS COMMODITY COSTS PER MCF INCLUDED IN NATURAL GAS SUPPLY CHARGES

Purchased gas commodity costs, per Mcf, shall be computed to the nearest one-hundredth cent (0.01¢) in accordance with the formula set forth below:

$$PGCC = \frac{(CC)}{(S)}$$

Purchased gas commodity costs, so computed, shall be included in Natural Gas Supply Charge rates charged to customers for gas service under the Residential, Commercial and Public Authority, Commercial and Public Authority Load Balancing Service ("LBS"), Small Volume Industrial, Intermediate Volume Industrial, Intermediate Volume Industrial LBS, Large Industrial, Large Industrial LBS, Large Volume Industrial and Large Volume Industrial LBS Service rate schedules for an initial period determined by the Commission and for consecutive twelve month periods beginning August l of each year thereafter, unless such period is revised by the Commission. The amount of purchased gas commodity costs, per Mcf, will vary, if appropriate, based upon annual filings, by the Company, pursuant to Section l307(f) of the Public Utility Code and such supplemental filings as may be required or be appropriate under Section l307(f) or the Commission's regulations adopted pursuant thereto.

In computing purchased gas commodity costs, per Mcf, pursuant to the formula, above, the following definitions shall apply:

"PGCC" - purchased gas commodity costs determined to the nearest one-hundredth cent (0.01¢) to be included in rates for each Mcf of gas supplied under Residential, Low Income Residential Assistance Service, Commercial and Public Authority, Commercial and Public Authority Load Balancing Service ("LBS"), Small Volume Industrial, Intermediate Volume Industrial, Intermediate Volume Industrial LBS, Large Industrial, Large Industrial LBS, Large Volume Industrial, Large Volume Industrial LBS and Natural Gas Vehicle Service rate schedules of this tariff.

"CC" - the estimated current commodity cost of gas including all associated hedging costs and deferrals, shall be determined as follows: (a) for all type of purchased gas, project the commodity cost for each purchase (adjusted for net current gas stored) for the projected period when rates will be in effect plus (b) the arithmetical sum of (1) the projected book value of noncurrent gas at the beginning of the computation year minus (2) the projected book value of noncurrent gas at the end of the computation year. This factor shall include no amount for purchased gas demand or winter requirement charges of an interstate pipeline company.

(C) Indicates Change

"S" - projected Mcf of gas to be billed to customers under the commodity charges of the Residential, Commercial and Public Authority, Commercial and Public Authority Load Balancing Service ("LBS"), Small Volume Industrial, Intermediate Volume Industrial, Intermediate Volume Industrial LBS, Large Industrial, Large Industrial LBS, Large Volume Industrial and Large Volume Industrial LBS Service rate schedules of this tariff during the period when rates will be in effect.

COMPUTATION OF PURCHASED GAS DEMAND COSTS PER MCF OF GAS INCLUDED IN NATURAL GAS SUPPLY CHARGES UNDER THE RESIDENTIAL, COMMERCIAL AND PUBLIC AUTHORITY, SMALL VOLUME INDUSTRIAL, INTERMEDIATE VOLUME INDUSTRIAL, LARGE VOLUME INDUSTRIAL, LARGE INDUSTRIAL AND STANDBY SERVICE RATE SCHEDULES

Purchased gas demand costs, per Mcf, to be included in Natural Gas Supply Charge rates under Residential, Commercial and Public Authority, Small Volume Industrial, Intermediate Volume Industrial, Large Volume Industrial, Large Industrial and Standby rate schedules shall be computed to the nearest one-hundredth cent (0.01c), in accordance with the formula set forth below:

$$PGDC = \left(\frac{(DC)}{(S - (SBS))} \right)$$

Purchased gas demand costs, so computed, shall be included in the rates charged to customers for gas service, pursuant to the Residential, Commercial and Public Authority, Small Volume Industrial Service, Intermediate Volume Industrial Service, Large Volume Industrial Service, Large Industrial Service and Standby Service rate schedules, for an initial period determined by the Commission and for consecutive twelve-month periods beginning August 1 of each year thereafter unless such period is revised by the Commission. The amount of purchased gas demand costs, per Mcf, will vary, if appropriate, based upon annual filings, by the Company, pursuant to Section 1307(f) of the Public Utility Code and such supplemental filings as may be required or be appropriate under Section 1307(f) or the Commission's regulations adopted pursuant thereto.

In computing purchased gas demand costs, per Mcf, pursuant to the formula, above, the following definitions shall apply:

"PGDC" - purchased gas demand costs determined to the nearest one-hundredth cent (0.01c) to be included in rates for each Mcf of gas supplied under Residential, Commercial and Public Authority, Small Volume Industrial Service, Intermediate Volume Industrial Service, Large Volume Industrial Service, Large Industrial Service and Standby Service rate schedules of this tariff.

"DC" - the estimated current demand cost of gas, determined by projecting, for all types of purchased gas, the total demand and winter-requirement charges from any interstate pipeline company or any other source of gas supply purchased by the Company for the projected period when rates will be in effect less projected current purchased gas demand cost revenue recovered through Distribution charges.

"S" - projected Mcf to be billed to customers during the projected period under the Residential, Commercial and Public Authority, Small Volume Industrial, Intermediate Volume Industrial, Large Industrial and Large Volume Industrial Service rate schedules.

"SBS" - projected Mcf volume to be billed to customers during the projected period under the Standby Service rate schedule.

COMPUTATION OF PURCHASED GAS DEMAND COSTS PER MCF OF GAS INCLUDED IN THE DISTRIBUTION CHARGES UNDER THE SALES RATE SCHEDULES AND THE RATE SCHEDULE SMALL AGGREGATION TRANSPORTATION CUSTOMER SERVICE

Purchased gas demand costs transportation, per Mcf, to be included in Distribution Charges under the Residential, Commercial and Public Authority, Small Volume Industrial, Intermediate Volume Industrial, Large Industrial and Large Volume Industrial Service rate schedules and the Rate Schedule Small Aggregation Transportation Customer Service shall be computed to the nearest one-hundredth cent (0.01c), in accordance with the formula set forth below:

$$PGDCT = \frac{(DCT + DEDC)}{(S + SATCV) - (SBS)}$$

“PGDCT” - Purchased gas demand costs transportation, per Mcf, to be included in Distribution Charges under the Residential, Commercial and Public Authority, Small Volume Industrial, Intermediate Volume Industrial, Large Industrial and Large Volume Industrial Service rate schedules and the Rate Schedule Small Aggregation Transportation Customer Service.

"DCT" - the estimated current demand cost of gas, determined by projecting, for all types of demand purchased gas capacity costs included in the Distribution Charges for Sales Service Rate Schedules and the Small Aggregation Transportation Customer Service Rates, the total usage, demand and winter-requirement charges from any interstate pipeline company or any other source of gas supply purchased by the Company for the projected period when rates will be in effect.

"DEDC" - experienced net overcollection or undercollection of purchased gas demand costs included in the Distribution Charges. Such experienced net overcollection or undercollection shall be determined for the most recent period permitted under law which shall begin with the month following the last month which was included in the previous over-under collection calculation reflected in rates.

The annual filing date shall be the date specified by the Company's Section 1307(f) tariff filing and not the date established by the Commission for pre-filing of certain information pursuant to 52 Pa. Code Sections 53.64(b)(1) and 53.65.

Supplier demand refunds received for capacity associated with the SATS capacity release provisions will be included in the calculation of the "DEDC" with interest added at the annual rate of six percent (6%) calculated from the month received to the effective month such refund is refunded. All other Supplier demand refunds received will be included in the calculation of the “DE” with interest added at the annual rate of six percent (6%) calculated from the month received to the effective month such refund is refunded.

"S" - projected Mcf to be billed to customers during the projected period under the Residential, Commercial and Public Authority, Small Volume Industrial, Intermediate Volume Industrial, Large Industrial and Large Volume Industrial Service rate schedules.

“SATCV” - projected Mcf to be transported to customers during the projected period under the Small Aggregation and Transportation Rate Schedule.

"SBS" - projected Mcf volume to be billed to customers during the projected period under the Standby Service rate schedule.

COMPUTATION OF OVER AND UNDER COLLECTED PURCHASED GAS COSTS PER MCF OF GAS TO BE INCLUDED IN THE GAS ADJUSTMENT CHARGE UNDER THE RESIDENTIAL, COMMERCIAL AND PUBLIC AUTHORITY, SMALL VOLUME INDUSTRIAL, INTERMEDIATE VOLUME INDUSTRIAL, LARGE VOLUME INDUSTRIAL, LARGE INDUSTRIAL, AND STANDBY SERVICE RATE SCHEDULES

Over and under collected gas costs, per Mcf, to be included in the Gas Adjustment Charge included in rates under Residential, Commercial and Public Authority, Small Volume Industrial, Intermediate Volume Industrial, Large Volume Industrial, Large Industrial, Small Aggregation Transportation Customer, and Standby rate schedules shall be computed to the nearest one-hundredth cent (0.01c), in accordance with the formula set forth below:

$$GAC = \frac{(CE + DE)}{(S1)} \quad (C)$$

In computing the gas adjustment charge, per Mcf, pursuant to the formula above, the following definitions will apply:

“GAC” – gas adjustment charge determined to the nearest one- hundredth cent (0.01¢) to be included in rates for each Mcf of gas supplied under Residential, Low Income Residential Assistance Service, Commercial and Public Authority, Commercial and Public Authority Load Balancing Service ("LBS"), Small Volume Industrial, Intermediate Volume Industrial, Intermediate Volume Industrial LBS, Large Industrial, Large Industrial LBS, Large Volume Industrial, Large Volume Industrial LBS and Natural Gas Vehicle Service rate schedules of this tariff. (C)

"CE" - experienced net overcollection or undercollection of purchased gas commodity costs. For the initial filing, pursuant to l307(f) of the Public Utility Code, in order to achieve an orderly transition from Gas Cost Rate procedures to Section 1307(f) procedures, such experienced net overcollection or undercollection, to be reflected in rates effective September 1, 1985, shall be the net overcollection or undercollection arising under the Gas Cost Rate procedure. The amount of such net overcollection or undercollection shall include the historic net amount as of March 31, 1985 together with the projected net overcollection or undercollection for the five-month period ending August 31, 1985.

After the transition from the Gas Cost Rate procedures, established pursuant to the Commission's order of October 1, 1978 at M-78050055, (52 Pa P.U.C. 217) as amended, to procedures established pursuant to Section 1307(f) of the Public Utility Code, such experienced net overcollection or undercollection shall be determined for the most recent period permitted under law which shall begin with the month following the last month which was included in the previous over-under collection calculation reflected in rates.

(C) Indicates Change

The annual filing date shall be the date specified by the Company's Section 1307(f) tariff filing and not the date established by the Commission for pre-filing of certain information pursuant to 52 Pa. Code Sections 53.64(b)(1) and 53.65.

Supplier commodity refunds received will be included in the calculation of "CE" with interest added at the annual rate of six percent (6%) calculated from the month received to the effective month such refund is refunded. Supplier commodity refunds will be included in the next quarterly filing after refunds are received pursuant to Case R-2013-2341534.

Pipeline penalty credits will be included in the calculation of "CE" as a credit to purchased gas costs from the month they are received to the effective month "CE" is refunded or collected. (C)

"DE" - experienced net overcollection or undercollection of purchased gas demand costs. For the initial filing, pursuant to l307(f) of the Public Utility Code, in order to achieve an orderly transition from Gas Cost Rate procedures to Section 1307(f) procedures, such experienced net overcollection or under-collection, to be reflected in rates effective September 1, 1985, shall be the net overcollection or undercollection arising under the Gas Cost Rate procedure. The amount of such net overcollection or undercollection shall include the historic net amount as of March 31, 1985 together with the projected net overcollection or undercollection for the five-month period ending August 31, 1985.

After the transition from the Gas Cost Rate procedures, established pursuant to the Commission's order of October 1, 1978 at M-78050055, (52 Pa P.U.C. 217) as amended, to procedures established pursuant to Section 1307(f) of the Public Utility Code, such experienced net overcollection or undercollection shall be determined for the most recent period permitted under law which shall begin with the month following the last month which was included in the previous over-under collection calculation reflected in rates.

The annual filing date shall be the date specified by the Company's Section 1307(f) tariff filing and not the date established by the Commission for pre-filing of certain information pursuant to 52 Pa. Code Sections 53.64(b)(1) and 53.65.

Supplier demand refunds received will be included in the calculation of "DE" with interest added at the annual rate of six percent (6%) calculated from the month received to the effective month such refund is refunded. Supplier demand refunds will be included in the next quarterly filing after refunds are received pursuant to Case R-2013-2341534.

"S1" - projected Mcf of gas to be billed to customers under the natural gas supply charges of the Residential, Commercial and Public Authority, Commercial and Public Authority Load Balancing Service ("LBS"), Small Volume Industrial, Intermediate Volume Industrial, Intermediate Volume Industrial LBS, Large Industrial, Large Industrial LBS, Large Volume Industrial and Large Volume Industrial LBS Service rate schedules of this tariff during the period when rates will be in effect.

(C) Indicates Change

DETERMINATION OF OVER/UNDERCOLLECTION OF GAS COSTS

The Company shall determine separate commodity cost and demand cost over/undercollections. In computing the experienced over/undercollection of purchased gas demand and commodity costs for a period defined by the Commission, the following procedure shall be used:

(a) All experienced purchased gas costs, actually incurred by the Company to serve customers pursuant to all rate schedules of this tariff shall be included as costs of purchased gas and shall be identified as demand or commodity costs;

(b) The following amount shall be included as purchased gas commodity or purchased gas demand revenues for recovery of gas costs:

(1) An amount determined by multiplying commodity volumes billed under the Residential, Low Income Residential Assistance Service, Commercial and Public Authority, Commercial and Public Authority Load Balancing Service ("LBS"), Small Volume Industrial, Intermediate Volume Industrial, Intermediate Industrial LBS, Large Industrial, Large Industrial LBS, Large Volume Industrial, Large Volume Industrial LBS and Natural Gas Vehicle rate schedules, for the applicable over/undercollection period, times the PGCC component excluding E Factor; plus

(2) An amount determined by multiplying commodity volumes billed under the Residential, Commercial and Public Authority, Small Volume Industrial, Intermediate Volume Industrial, Large Volume Industrial and Large Industrial rate schedules for the applicable over/undercollection period, times the PGDC charge as determined under this rider; plus

(3) An amount determined by multiplying demand volumes billed under Rate Schedule SB to LVIS and LIS customers times the PGDC charge; plus

(4) An amount determined by multiplying gas billing demand units ("Gas BDU") billed under the Commercial and Public Authority Load Balancing Service ("LBS"), Intermediate Volume Industrial LBS, Large Industrial LBS and Large Volume Industrial LBS rate schedules, for the applicable over/undercollection period, times the Rate Per Gas BDU applicable to customers under the LBS rate schedules.

(5) An amount determined by multiplying commodity volumes billed under the rate schedule for Natural Gas Vehicle Service for the applicable over/under collection period, times the applicable rate applicable to customers under the new Rate Schedule.

(6) An amount equal to all actual purchased gas costs recovered under the rate schedule Monthly Metered Transportation Service. In computing revenues for recovery of purchased gas costs under this item (6), any adjustment to rates under Special Provision L. of the Rate Schedule for Monthly Metered Transportation Service will be eliminated from the calculation. (C)

(7) An amount determined by multiplying the volume expressed in Mcf of gas transported under any Load Balancing Service rate schedule times the portion of the Commodity Rate for recovery of purchased gas costs.

(8) An amount equal to seventy-five percent of the revenues before income taxes from off-system sales over the monthly average commodity cost of gas plus variable transportation costs to deliver the gas to the off-system customer. The monthly average commodity cost of gas shall be defined as the monthly average commodity cost of gas purchases for all supplies scheduled at the beginning of the month; provided, however, that, if an additional unscheduled purchase is made during the month specifically for an off-system sale, such purchase shall be considered to be the gas used to make the off-system sale and the commodity cost of such purchase will be assigned to off-system sales up to the volume of the purchase. Off-system sales for 30-day nonrefundable sales commencing on the first of the month shall be treated as specific purchase sales for determining the cost of gas assigned to the sale. Gas will not be withdrawn from storage to make off-system sales, and the prices charged for off-system sales will not reflect the price attributable to gas withdrawn from storage. Any remaining off-system sale not covered by such unscheduled purchase(s) shall be assigned a gas cost equal to the monthly average commodity cost of scheduled purchases. The Company shall retain the remaining 25%.

(C) Indicates Change

(9) An amount determined by multiplying volumes billed under the Small Aggregation Transportation Service rate schedule times the PGDCT charge recovered through rates under rate schedule Small Aggregation Transportation Customer Service.

(10) An amount equal to the revenues from Daily Metered Transportation customers produced by charges for overdeliveries of transportation gas to such customers.

(11) An amount equal to 75% of the revenues generated from the release of pipeline transmission and storage capacity other than releases for SATS customers. The Company shall retain the remaining 25%.

(12) An amount equal to 75% of the savings from gas storage fill contracts as established in Case R-0016789. The Company shall retain the remaining 25%.

(13) An amount equal to 75% of asset management arrangements under FERC Order 712 for capacity releases associated with identified capacity contracts. The Company shall retain the remaining 25%.

Interest shall be computed monthly at the appropriate rate provided for in Section 1307(f)(5) of the Public Utility Code from the month that the over or under-collection occurs to the effective month such over-under collection is refunded or recouped as appropriate.

QUARTERLY UPDATES

The Company’s rates for recovery of purchased gas costs will be subject to quarterly adjustments under procedures set forth in the Commission’s regulations at 52.Pa. Code § 53.64(i)(5). Such updates will reflect, in addition to data specified in the regulation, changes in the projected commodity cost of purchased gas based upon the NYMEX source of data and method used in projecting the commodity cost of purchased gas approved by the Commission in the Company’s most recent annual proceeding for recovery of purchased gas costs under Section 1307(f) of the Public Utility Code. In addition, the Company will calculate rates in the November, February and May quarterly filings using annual sales volumes to determine the purchased gas cost rates as ordered at Docket R-2017-2582461.

The Company’s rate for the recovery of purchased gas costs for Monthly Metered Transportation Service will be subject to a quarterly adjustment to reflect changes in the rates of National Fuel Gas Supply Corporation when final rates are approved by the Federal Energy Regulatory Commission. (C)

(C) Indicates Change

ADJUSTMENT OF "CE" and “DE” FACTOR AMOUNTS

Each 1307(f) rate shall also provide for refund or recovery of amounts necessary to adjust for over or underrecoveries of "CE" and “DE” factor amounts included in prior 1307(f) rates. In computing the amount to be included for over or undercollection of "CE" and “DE” factor amounts, the amount recovered for "CE" and “DE” factor amounts under the prior 1307(f) rate shall be determined by multiplying the commodity volumes billed under the Residential, Low Income Residential Assistance Service, Commercial and Public Authority, Commercial and Public Authority Load Balancing Service ("LBS"), Small Volume Industrial, Intermediate Volume Industrial, Intermediate Volume Industrial LBS, Large Industrial, Large Industrial LBS, Large Volume Industrial, Large Volume Industrial LBS, and Natural Gas Vehicle Service rate schedules during the applicable 1307(f) period times the portions of the PGCC and PGDC component that provide for recovery of "CE" and “DE” factor amounts, and adding to that product, the amount recovered from Small Aggregation Transportation Customer Service customers for “DE” factor amounts under the prior 1307(f) rate which shall be determined by multiplying the commodity volumes billed under the Small Aggregation Transportation Customer Service rate schedules during the applicable 1307(f) period times the PGDC component that provides for recovery of “DE” factor amounts under the Small Aggregation Transportation Customer Service. (C)

(C) Indicates change

RIDER B

STATE TAX ADJUSTMENT SURCHARGE

In addition to the charges provided in this tariff, a surcharge of (0.17)% will apply to all non-Purchased Gas Cost charges for service rendered on or after October 1, 2025. (D) (C)

The above surcharge will be recomputed using the same elements prescribed by the Commission.

a. Whenever any of the tax rates used in calculation of the surcharge are changed;

b. Whenever the utility makes effective an increase or decrease in base rates, exclusive of Purchased Gas Cost rates and applicable Rider rates.

c. On March 31, 1971, and each year thereafter.

The above recalculation will be submitted to the Commission within one (1) day after the occurrence of the event or date which occasions such recomputation; and, if the recomputed surcharge is less than the one in effect, the Company will, and if the recomputed surcharge is more than the one then in effect, the Company may submit with such recomputation a tariff or supplement to reflect such recomputed surcharge, the effective date of which shall be one (1) day after filing.

In Compliance with P-2017-2591001 Order entered October 5, 2017, the Company shall file its State Tax Adjustment Surcharge filings on one day’s notice.

RIDER C
WEATHER NORMALIZATION ADJUSTMENT

Applicability and Purpose:

A Weather Normalization Adjustment ("WNA") shall be applied to bills of customers served under Residential, CAP, and Commercial and Public Authority Rate Schedules, for any bills rendered during the heating season October through May. (C)

Calculation of Adjustment Amount:
The WNA will be applied to October through May billing cycles and shall be calculated on a customer account specific basis in accordance with the formula below:

WNBC = BLMC + [((NHDD +/- (NHDD x 3%)) / AHDD) x (AMC - BLMC)]
WNAC = WNBC - AMC
WNA = WNAC x Distribution Charge

(a) Weather Normalized Billing Ccfs("WNBC") will be calculated as the Base Load Monthly Ccfs ("BLMC") added to the product of the Normal Heating Degree Days ("NHDD"), adjusted for a 3% deadband as further discussed below, divided by the Actual Heating Degree Days ("AHDD") and the Actual Monthly Ccfs ("AMC") less the BLMC. Weather Normalized Billing Ccfs (WNBC) will only be calculated if the AMC exceeds the BLMC. WNA will not be applicable for the billing period if AMC is less than the BLMC.

(b) BLMC shall be established for each customer using the customer's actual consumption from the billing system, measured in Ccfs.

(c) AMC shall be measured for each customer and billing cycle and will be based on actual or estimated meter readings.

(d) NHDD shall be based upon the 15-year average (2006-2020) for the given day, as reported by the National Oceanic and Atmospheric Administration (NOAA) for the Erie International Airport weather station.

(e) AHDD shall be the actual experienced heating degree days during the billing cycle. AHDD shall be based upon experienced actual Gas Day temperatures as reported by the NOAA for the Erie International Airport weather station.

(f) AMC will be subtracted from the WNBC to compute the Weather Normalized Adjustment Ccfs ("WNAC").

(g) The WNAC shall then be multiplied by the applicable Rate Schedule Distribution Charge based on service rendered to compute the WNA amount that will be charged or credited to each customer.

(C) Indicates Change

RIDER C
WEATHER NORMALIZATION ADJUSTMENT (Cont.)

(h) A deadband of 3% shall apply. The WNA for a billing cycle will apply only if the AHDD for the billing cycle are lower than 97% or higher than 103% of the NHDD for the billing cycle.

(i) The WNA factor shall be calculated by first adjusting the NHDD for the billing cycle by the deadband percentage of 3%. The deadband percentage shall be multiplied by the NHDD and then added to NHDD for the billing period when the weather is colder than normal (i.e., AHDD>NHDD) or subtracted from NHDD for the billing period when the weather is warmer than normal (i.e., AHDD<NHDD).

(j) In the event a customer's bill needs to be canceled and rebilled at any time, the WNA will be recalculated using the most recently available data for the billing period. In some cases, updates in data used in the calculation, may result in a different WNA for the billing period.

(k) The WNA shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge as set forth in this tariff.

(l) The Company will file reports detailing weather normalization information with the Commission as outlined in the Final Order at the Company's Base Rate Proceeding at Docket No. R-2022-3035730.

(C) Indicates Change

(C)

RESERVED FOR FUTURE USE

(C) Indicates Change

(C)

RESERVED FOR FUTURE USE

(C) Indicates Change

RIDER E
CUSTOMER EDUCATION CHARGE

Effective April 1, 2000, a charge will be included in the rates subject to this Rider to provide for recovery of costs of providing consumer education to inform customers of the changes in the Natural Gas Utility Industry.

The charge will be designed to recover the following customer education costs ("CED costs"):

1. Costs associated with providing information necessary to assist customers in making appropriate choices as to their natural gas service; and

2. Costs associated with any and all consumer education programs as a result of restructuring under the Natural Gas Choice and Competition Act.

APPLICABILITY

In addition to the charges provided in this tariff, a charge calculated in the manner explained below shall be added to the otherwise applicable charge for each Mcf of sales and transportation volumes delivered by the Company to customers receiving service under the Residential, Commercial and Public Authority, SVIS, IVIS, and SATC rate schedules, or successor rate schedules.

CALCULATION OF RATE

A charge will be recalculated annually based upon deferred and annually projected CED costs.

Effective January 1, 2001, the rate will be calculated to produce a levelized rate reflecting all deferred CED costs, and any actual and expected CED costs for the period from January 1 through December 31 and continue annually thereafter, divided by the total projected volumes of Residential, Commercial and Public Authority, SVIS, IVIS, and SATC rate schedules, for each twelve (12) month period over which this charge will be in effect.

The charge to be included in rates shall be $0.0000/Mcf. (C)

Effective September 29, 2004 per M-00001326 Secretarial letter Issued June 21, 2004, the rate will be recalculated to remove the third year assessment for state-wide gas consumer education costs. The filling effective September 29, 2004 will not be a reconciled filing.

(I) Indicates Increase
(D) Indicates Decrease
(C) Indicates Change

ANNUAL RECONCILIATION

Commencing January 1, 2002, and annually thereafter, the levelized rate will be adjusted for over/undercollections for the prior twelve (12) month period by comparing projections of CED costs and revenues under this Rider to actual amounts experienced. The annual reconciliation filing to be effective January 1, 2002, and thereafter shall include a reconciliation of actual experienced expenses for the preceding twelve (12) month period ended December 31. All reconciliations shall be based upon actual amounts through October 31 and estimates for November and December. Estimates for November and December shall be reconciled in the following reconciliation period. The rate will be designed to recover or refund the applicable under or over recovery over the twelve (12) month period beginning January 1. Each annual reconciliation shall also provide for refund or recovery of amounts necessary to adjust for over or under recoveries of amounts also included in prior reconciliations. Annual reconciliations for the appropriate periods will be filed in accordance with 66 Pa.C.S. §1307(e) by January 30. (C)

1. Annual Filing

The annual reconciliation and projected annual CED costs shall be filed thirty (30) days prior to January 1 and the recalculated rate shall become effective for service on or after January 1 and annually thereafter. (C)

(C)Indicates Change

RIDER F
CAP DISCOUNT CHARGE

CURRENT CAP RATE DISCOUNT

Effective August 1, 2023, a charge will be included in the rates subject to this Rider to provide for recovery of costs of the projected CAP rate discounts, pre-program arrearage forgiveness, and program costs exclusive of company labor for the upcoming 12 months.

Such charge shall be updated quarterly and effective each February 1, May 1, August 1, and November 1 of the year. The charge will also be updated whenever there is a change to the Residential Sales Service Rate Customer Charge, Distribution Charge, Natural Gas Supply Charge, or Gas Adjustment Charge.

APPLICABILITY

In addition to the charges provided in this tariff, a charge calculated in the manner explained below shall be added to the otherwise applicable charge for each Mcf of sales and transportation volumes delivered by the Company to customers receiving service under the Residential Sales Service Rate Schedule and the Residential rates of the SATC, MMT, and DMT transportation rate schedules.

CALCULATION OF RATE

The charge will be recalculated as specified above.

The charge shall be equal to the total annual projected discounts, pre-program arrearage forgiveness, and program costs exclusive of company labor for CAP customers for the upcoming 12 month period divided by the annual normalized throughput volumes of the qualified rate classes. The total annual projected discounts for the CAP customers for the upcoming 12 month period shall equal the sum of the individual monthly total projected discounts for CAP customers for the upcoming 12 months ("CAP Discount"). The total monthly projected discounts, pre-program arrearage forgiveness, and program costs exclusive of company labor for CAP customers shall equal the residential bill for the average CAP customer consumption for the month multiplied by the average discount percentage for CAP service multiplied by the projected number of CAP customers for the month.

The currently effective charge for the current CAP Discount to be included in rates is $0.1223/Mcf. (D)

(D) Indicates Decrease (I) Indicates Increase

RIDER F
CAP DISCOUNT CHARGE (C)

CAP FUNDING RECONCILIATION CHARGE

A charge will be included in the rates subject to this Rider to provide for the full recovery of costs in conjunction with the Company's CAP Discounts, program costs, and forgiven pre-program arrearages. Annual reconciliations for the appropriate periods will be filed in accordance with 66 Pa.C.S. §1307(e) by October 30. (C)

Such charge shall be updated annually and effective each February 1 of the year.

CALCULATION OF RECONCILIATION COMPONENT OF RATE

The charge will have five components; the first associated with the CAP Discount), the second with the CAP program costs, the third with the CAP forgiven pre-program arrearages, the fourth with the incremental customer credit and a fifth with the adjustment for over/under recovery of the prior period charge. The charge will be recalculated as specified above. (C)

The charge associated with the CAP Discount will contain the following calculation: (C)

The annual reconciliation charge associated with the CAP Discounts will be based on the previous fiscal year (October through September) actual over/(under) collection determined by comparing discounts provided in bills to CAP customers as compared to discounts billed to Residential customers under this Rider. (C)

(C) Indicates Change

RIDER F (C)
CAP DISCOUNT CHARGE

CAP FUNDING RECONCILIATION CHARGE (con't.)

CALCULATION OF RECONCILIATION COMPONENT OF RATE (con't)

The charge associated with the CAP program costs will contain the following calculation: (C)

The annual reconciliation charge associated with the CAP program costs will be calculated based on the previous annual fiscal year costs (October through September) to administer the CAP program excluding company labor and benefits less the projected amount included in the rider for the previous fiscal year. (C)

The charge associated with the CAP forgiven pre-program arrearages will contain the following calculation: (C)

The annual reconciliation charge associated with the CAP forgiven pre-program arrearages will be based on the previous annual fiscal year pre-program forgiven arrearages (October through September) associated with the CAP program less the projected amount included in the rider for the previous fiscal year. (C)

(C) Indicates Change

RIDER F
CAP DISCOUNT CHARGE

CAP FUNDING RECONCILIATION CHARGE (con't)
CALCULATION OF RECONCILIATION COMPONENT OF RATE (con't)

The charge associated with the incremental customer credit will contain the following calculation:

Effective February 1, 2009, an annual credit of $35 per customer will be provided associated with the CAP incremental customers. The credit will be based on the average number of CAP customers billed during the previous fiscal period (October - September) less 9,702. The annual credit will continue until new base rates become effective as a result of a general rate proceeding. If the average number of CAP customers billed during the previous fiscal period is 9,702 or less, the credit will be $0.

The CAP Funding Reconciliation Charge will be the summation of the charges calculated above divided by the projected February 1 through January 31 volumes.

ADJUSTMENT FOR OVER / UNDER RECOVERY OF PRIOR PERIOD CHARGE

The filing to be effective every February 1 shall include a levelized rate for over/under collections for the prior (12) month period by comparing projected revenues under this Rider to actual revenue amounts experienced. The annual reconciliation shall be based upon actual revenues through December 31 and estimated revenues for January. Estimates for January shall be included in the following reconciliation period. The rate will be designed to recover or refund the applicable under or over recovery over the twelve (12) month period beginning February.

RIDER F CAP Discount Charge Component	$/Mcf	
Current CAP Discount	$0.1355	(D)
Cap Funding Reconciliation Charge	$(0.0053)	
Adjustment for Over/Under Recovery of Prior Period Charge	$(0.0079)	
Total RIDER F	$0.1223	(I)

The currently effective charge to be included in rates is $0.1223/Mcf. (I)

(D) Indicates Decrease (I) Indicates Increase

Rider G
Merchant Function Charge (MFC) Rider

Applicability:

The Merchant Function Charge (MFC) shall be added to the Natural Gas Supply Charge and Gas Adjustment Charge of Residential, CAP, Commercial and Public Authority, SVIS, IVIS, LVIS and LIS rate schedules.

Such charges shall be updated quarterly and effective each February 1, May 1, August 1, and November 1 of the year. The charge will also be updated whenever there is a change to the Sales Service Rate Customer Charge, Distribution Charge, Natural Gas Supply Charge or Gas Adjustment Charge.

Calculation of Rate:

For customers receiving service in the Residential classification, the MFC shall equal 1.8032% times the Natural Gas Supply Charge and the Gas Adjustment Clause as calculated for Rider A.

The current Residential MFC Charge is:

Natural Gas Supply Charge per Mcf	$0.0907	(D)
Gas Adjustment clause (E-Factor) per Mcf	$0.0037	(D)
Total Residential MFC per Mcf	$0.0944	(D)

For customers receiving service in the Non-Residential classifications, the MFC shall equal 0.3398% times the Natural Gas Supply Charge and Gas Adjustment Clause as calculated for Rider A.

The current Non-Residential MFC Charge is:

Natural Gas Supply Charge per Mcf	$0.0171	(D)
Gas Adjustment clause (E-Factor) per Mcf	$0.0007	(D)
Total Non-Residential MFC per Mcf	$0.0178	(D)

(D) Indicates Decrease (I) Indicates Increase

Rider H
Gas Procurement Charge (GPC)

APPLICABILITY

Effective June 1, 2013, the Gas Procurement Charge will be included in the Natural Gas Supply Charge of Residential, CAP, Commercial and Public Authority, SVIS, IVIS, LVIS and LIS rate schedules.

The charge is designed to recover the costs of procuring natural gas pursuant to 52 Pa. Code §62.223. The natural gas procurement costs included in the GPC charge will only be updated in a base rate case.

The GPC to be included in the Natural Gas Supply Charge shall be $0.1149 / Mcf and is not reconcilable.

Price To Compare Component	Residential (¢ per 100 cubic feet)	Non Residential (¢ per 100 cubic feet)	
Natural Gas Supply Charge			
Purchased Gas Cost Component (Rider A)	50.334	50.334	(D)
Merchant Function Charge associated with Natural Gas Supply Charge(Rider G)	0.907	0.171	(D)
Gas Procurement Charge (Rider H)	1.149	1.149	
Subtotal Natural Gas Supply Charge	52.390	51.654	(D)
Gas Adjustment Charge			
Purchased Gas Cost Component (Rider A)	2.036	2.036	(D)
Merchant Function Charge associated with Gas Adjustment Charge (Rider G)	0.037	0.007	(D)
Subtotal Gas Adjustment Charge	2.073	2.043	(D)
Total Price To Compare	54.463	53.697	(D)

(D) Indicates Decrease (I) Indicates Increase

TCJA TEMPORARY SURCHARGE

To implement the effects of the Tax Cuts and Jobs Act (TCJA), on March 15, 2018 the Pennsylvania Public Utility Commission (Commission) issued a Temporary Rates Order at Docket No. M-2018-2641242 directing the utility to file its current base rates and riders as temporary rates, pursuant to Section 1310(d) of the Public Utility Code. 66 Pa. C.S. § 1310(d). Subsequently, on May 17, 2018, the Commission entered Orders in the above case and at Docket No. R-2018-3000527 superseding the March 15, 2018 Temporary Rates Order directing the utility to establish temporary rates as follows:

A negative surcharge will apply as a credit to all customer bills at an equal percentage of non-gas revenue among the various customer classes, exclusive of STAS and automatic adjustment clause revenues, for bills rendered for intrastate service. The credit will be applied on a per Mcf basis, by service class, as indicated in the table below. The total credits provided to customers through this negative surcharge will be reconciled with actual differences in federal income tax expense of a pre- and post-TCJA basis and will remain in place until the Company files and the Commission approves new base rates for the utility pursuant to Section 1308(d) that include the effects of the TCJA tax rate changes. The Company's last Base Rate Case at Docket # R-2022-3035730 included the effects of the TCJA tax rate change. Interest on over or under collections shall be computed monthly at the residential mortgage lending rate specified by the Secretary of Banking in accordance with the Loan Interest and Protection Law (41 P.S. §§ 101, et seq.) from the month that the over or under collection occurs to the mid-point of the recovery period. Upon determination that the negative surcharge, if left unchanged, would result in a material over or under collection, the Company may file with the Commission, on at least 10 days' notice, for an interim revision of the TCJA Temporary Surcharge. The TCJA Temporary Surcharge will be filed with the Commission by September 1 of each year to become effective the following October 1, reflecting estimated TCJA savings for the fiscal year. (C)

Service Class	Total Rate $ / MCF	
Sales & SATC		
Residential (RSS & CAP)	$0.00000	(D)
Small Comm./Public Authority < 250	$0.00000	(D)
Small Comm./Public Authority > 250	$0.00000	(D)
Large Comm./Public Authority	$0.00000	(D)
Small Volume Industrial Service	$0.00000	(D)
Inter. Vol. Industrial Service	$0.00000	(D)
MMT & DMT		
Residential	$0.00000	(D)
Small Comm./Public Authority < 250	$0.00000	(D)
Small Comm./Public Authority > 250	$0.00000	(D)
Large Comm./Public Authority	$0.00000	(D)
Small Volume Industrial Service	$0.00000	(D)
Inter. Vol. Industrial Service	$0.00000	(D)
Large Volume Industrial Service	$0.00000	(D)
Large Industrial Service	$0.00000	(D)

RIDER I OPEB TEMPORARY SURCREDIT

Effective October 1, 2021, a one-time bill credit will be applied and a surcredit will be included in the rates subject to this Rider to provide for the pass back of funds collected previously for Other Post Retirement Benefits ("OPEB") expenses that have been deferred for the benefit of ratepayers as a regulatory liability in accordance with the settlement order in Docket # R-00061493.

$25,000,000 of the OPEB regulatory liability has been reserved to pass back to customers as a one-time bill credit. The bill credit will be applied to customers' bills for active accounts as of October 1, 2021 and in the following amounts per class:

Residential	$100
C/PA	$250
Industrial	$1,500

An additional $29,000,000 of the OPEB regulatory liability has been reserved to pass back via a surcredit over 5-years ($5,800,000 per year). The surcredit will apply as a credit to all customer bills at a set allocation percentage equal to the allocation percentage of the Company's base rate increase in Docket # R-00061493 among the various customer classes, exclusive of STAS and automatic adjustment clause revenues, for bills rendered for intrastate service on and after October 1, 2021. The surcredit will be applied on a per Mcf basis, by service class, as indicated in the table below. The surcredit will continue for a period of 5 years without reconciliation. Interest is not applicable to the OPEB balance. The OPEB Temporary Surcredit will be filed with the Commission by October 1 of each year and will be recalculated annually during the 5-year period.

Service Class	Refund Rate Effective 10/1/25	
Sales & SATC		
Residential (RSS & CAP)	($0.21239)	(I)
Small Comm./Public Authority < 250	($0.10550)	(I)
Small Comm./Public Authority > 250	($0.11762)	(I)
Large Comm./Public Authority	($0.09274)	(I)
Small Volume Industrial Service	($0.06196)	(D)
Intermediate Vol. Industrial Service	($0.13411)	(I)
MMT & DMT		
Residential	($0.10726)	(D)
Small Comm./Public Authority < 250	($0.07788)	(I)
Small Comm./Public Authority > 250	($0.10683)	(I)
Large Comm./Public Authority	($0.11836)	(I)
Small Volume Industrial Service	($0.02116)	(I)
Intermediate Vol. Industrial Service	($0.06070)	(I)
Large Volume Industrial Service	($0.07097)	(D)
Large Industrial Service	($0.01377)	(I)

A total of $54,000,000 held in a grantor trust will be used for the passback of funds described above. At the conclusion of the 5-year period, the Company will terminate the grantor trust. (C)

The Company is suspending regulatory accounting associated OPEB expense because such costs are $0 and base delivery rates have been reduced to eliminate the recovery of OPEB expenses. The $54,000,000 passed back to ratepayers through the one-time bill credit and surcredit mechanisms described above will reduce the regulatory liability due to ratepayers. The remaining regulatory liability balance due to ratepayers will be addressed in the next base rate proceeding.

Of the regulatory liability balance that is not attributed to ratepayers, the Company will immediately record any portion of the balance attributed to the O&M component of any SFAS 106 income that has accumulated since the last base rate proceeding as a reduction to OPEB expense. The remaining regulatory liability balance not attributed to ratepayers is to be transferred into an account separate from the regulatory liability due to ratepayers and be used to reduce the cost of labor charged to capital projects and affiliates over a period of 5 years. Any remaining portion of the regulatory liability after the expiration of the 5-year period will be addressed in the next base rate proceeding.

DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC)

In addition to the net charges provided for in this Tariff, a charge of 4.83% will apply consistent with the Commission Order dated December 5, 2024 at Docket No. P-2022-3034957, approving the DSIC. (I)

1. General Description

A. Purpose: To recover the reasonable and prudent costs incurred to repair, improve, or replace eligible property which is completed and placed in service and recorded in the individual accounts, as noted below, between base rate cases and to provide the Utility with the resources to accelerate the replacement of aging infrastructure, to comply with evolving regulatory requirements and to develop and implement solutions to regional supply problems.

The costs of extending facilities to serve new customers are not recoverable through the DSIC.

B. Eligible Property: The DSIC-eligible property will consist of the following:

- Piping (accounts 365, 367, 374, 376);
- Couplings (account 376);
- Gas services lines (account 380) and insulated and non-insulated fittings (account 378);
- Valves (account 376);
- Excess flow valves (account 376);
- Risers (account 376);
- Meter bars (account 382);
- Meters (account 381);
- Measuring and Regulator Stations (accounts 334,366, 369, 375, 378, 381, 384)
- Industrial and Farm Tap Measuring and Regulating Equipment (account 385)
- Unreimbursed costs related to highway relocation projects where a natural gas distribution company or city natural gas distribution operation must relocate its facilities; and
- Other related capitalized costs (misc accounts)

C. Effective Date: The DSIC will become effective January 1, 2026. (C)

2. Computation of the DSIC

A. Calculation: The initial DSIC, effective January 1, 2025 shall be calculated to recover the fixed costs of eligible plant additions that have not previously been reflected in the Utility's rates or rate base and will have been placed in service between October 1 to November 30, 2024.

DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC)

Thereafter, the DSIC will be updated on a quarterly basis to reflect eligible plant additions placed in service during the three-month periods ending one month prior to the effective date of each DSIC update. Thus, changes in the DSIC rate will occur as follows:

Effective Date of Change	Date to which DSIC-Eligible Plant Additions Reflected
April 1	December 1 through February 28
July 1	March 1 through May 31
October 1	June 1 through August 31
January 1	September 1 through November 30

B. Determination of Fixed Costs: The fixed costs of eligible distribution system improvements projects will consist of depreciation and pre-tax return, calculated as follows:

1. Depreciation: The depreciation expense shall be calculated by applying the annual accrual rates employed in the Utility's most recent base rate case for the plant accounts in which each retirement unit of DSIC-eligible property is recorded to the original cost of DSIC- eligible property.

2. Pre-tax return: The pre-tax return shall be calculated using the statutory state and federal income tax rates, the Utility's actual capital structure and actual cost rates for long- term debt and preferred stock as of the last day for the three-month period ending one month prior to the effective date of the DSIC and subsequent updates. The cost of equity will be the equity return rate approved in the Utility's last fully litigated base rate proceeding for which a final order was entered not more than two years prior to the effective date of the DSIC. If more than two years shall have elapsed between the entry of such a final order and the effective date of the DSIC, then the equity return rate used in the calculation will be the equity return rate calculated by the Commission in the most recent Quarterly Report on the Earnings of Jurisdictional Utilities released by the Commission.

C. Application of DSIC: The DSIC will be expressed as a percentage carried to two decimal places and will be applied to the total amount billed to each customer for distribution service under the otherwise applicable rates and charges, excluding amounts billed for the State Tax Adjustment Surcharge (STAS). To calculate the DSIC, one-fourth of the annual fixed costs associated with all property eligible for cost recovery under the DSIC will be divided by the projected revenue for distribution service (including all applicable clauses and riders) for the quarterly period during which the charge will be collected, exclusive of STAS.

DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC)

D. Formula: The formula for calculation of the DSIC is as follows:

$$DSIC = \frac{(DSI * PTRR + STFT + Dep + e)}{PQR}$$

Where:

DSI = Original cost of eligible distribution system improvement projects net of accrued depreciation and associated accumulated deferred income taxes pertaining to property-related book/tax depreciation timing differences resulting from the use of accelerated depreciation per Internal Revenue Code, 26 U.S. Code § 168.

PTRR = Pre-tax return rate applicable to DSIC-eligible property.

STFT = (State Tax Flow Through) Pre-tax flow through calculated on book-tax timing differences between accelerated tax depreciation and book depreciation net of federal tax.

Dep = Depreciation expense related to DSIC-eligible property.

e = Amount calculated (+/-) under the annual reconciliation feature or Commission audit, as described below.

PQR Projected quarterly revenues for distribution service (including all applicable clauses and riders) including any revenue from existing customers plus netted revenue from any customers which will be gained or lost by the beginning of the applicable service period.

Revenues will be determined as one-fourth of projected annual revenue.

3. Quarterly Updates: Supporting data for each quarterly update will be filed with the Commission and served upon the Commission's Bureau of Investigation and Enforcement, the Office of Consumer Advocate, and the Office of Small Business Advocate at least ten (10) days prior to the effective date of the update.

4. Customer Safeguards:

A. Cap: The DSIC is capped at 5.0% of the amount billed to customers for distribution service (including all applicable clauses and riders) as determined on an annualized basis.

B. Audit/Reconciliation: The DSIC is subject to audit at intervals determined by the Commission. Any cost determined by the Commission not to comply with any provision of 66 Pa C.S. §§ 1350, *et seq.*, shall be credited to customer accounts. The DSIC is subject to annual reconciliation based on a reconciliation period consisting of the twelve months ending December 31 of each year or the utility may elect to subject the DSIC to quarterly reconciliation but only upon request and approval by the Commission. The revenue received under the DSIC

DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC)

for the reconciliation period will be compared to the Company's eligible costs for that period. The difference between revenue and costs will be recouped or refunded, as appropriate, in accordance with Section 1307(e), over a one-year period commencing on April 1 of each year, or in the next quarter if permitted by the Commission. If DSIC revenues exceed DSIC-eligible costs, such over-collections will be refunded with interest. Interest on over-collections and credits will be calculated at the residential mortgage lending specified by the Secretary of Banking in accordance with the Loan Interest and Protection Law (41 P.S. §§ 101, et seq.) and will be refunded in the same manner as an over-collection. The utility is not permitted to accrue interest on under collections.

C. New Base Rates: The DSIC will be reset at zero upon application of new base rates to customer billings that provide for prospective recovery of the annual costs that had previously been recovered under the DSIC. Thereafter, only the fixed costs of new eligible plant additions that have not previously been reflected in the Utility's rates or rate base will be reflected in the quarterly updates of the DSIC.

D. Customer Notice: Customers shall be notified of changes in the DSIC by including appropriate information on the first bill they receive following any change. An explanatory bill insert shall also be included with the first billing.

E. All Customer Classes: The DSIC shall be applied equally to all customer classes, except that the Company may reduce or eliminate the DSIC to any customer with competitive alternatives who are paying flexed or discounted rates and customers having negotiated contracts with the Company.

F. Earnings Reports: The DSIC will also be reset at zero if, in any quarter, data filed with the Commission in the Utility's then most recent Annual or Quarterly Earnings reports show that the Utility would earn a rate of return that would exceed the allowable rate of return used to calculate its fixed costs under the DSIC as described in the pre-tax return section. The utility shall file a tariff supplement implementing the reset to zero due to overearning on one- days' notice and such supplement shall be filed simultaneously with the filing of the most recent Annual or Quarterly Earnings reports indicating that the Utility has earned a rate of return that would exceed the allowable rate of return used to calculate its fixed costs.

G. Residual E-Factor Recovery Upon Reset to Zero: The utility shall file with the Commission interim rate revisions to resolve the residual over/under collection or E-factor amount after the DSIC rate has been reset to zero. The utility can collect or credit the residual over/under collection balance when the DSIC rate is reset to zero. The utility shall refund any overcollection to customers and is entitled to recover any under collections as set forth in Section 4.B. Once the utility determines the specific amount of the residual over or under collection amount after the DSIC rate is reset to zero, the utility shall file a tariff supplement with supporting data to address that residual amount. The tariff supplement shall be served upon the Commission's Bureau of Investigation and Enforcement, the Bureau of Audits, the Office of Consumer Advocate, and the Office of Small Business Advocate at least ten (10) days prior to the effective date of the supplement.

NATIONAL FUEL EXHIBIT F

Section 2 - Proposed Tariff

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
BUFFALO, NEW YORK

RATES, RULES AND REGULATIONS

GOVERNING THE FURNISHING

OF

NATURAL GAS SERVICE

IN
TERRITORY DESCRIBED HEREIN

Issued: January 28, 2026, 2025 Effective: March 29, 2026

M. D. Colpoys, PRESIDENT
BUFFALO, NEW YORK

This Supplement includes increases, decreases, and changes to existing rates.
See page 2-3A.

LIST OF CHANGES MADE BY THIS TARIFF

CHANGE:

1. Rules and Regulations – Access to Premises – Rule No.8 is being proposed.
   Page 19.

2. Rules and Regulations – Market Price of Natural Gas language updated.
   Page 35E.

3. Daily Metered Transportation – Service Agreement, and telecommunications responsibilities language updated.
   Pages 110 and 110A.

4. Monthly Metered Transportation and Daily Metered Transportation – language updated.
   Pages 100, 101, 111, and 112.

5. Energy Efficiency Program – implementation and addition of EE Program charge is being proposed.
   Page 160.

6. OPEB Temporary Surcredit (Rider I) – implementation of one-time low-income bill credit and one-year surcredit is being proposed and language updated.
   Page 171 and 171A.

7. Distribution System Improvement Charge (DSIC) – language updated.
   Page 172.

8. TCJA Surcredit removed – pages reserved for future use.
   Page 170.

DECREASE:

9. The Distribution System Improvement Charge ("DSIC") decreases.
   Page 172.

10. Rider B – The State Tax Adjustment Surcharge, decreased to 0.00% for all services.
    Page 157.

LIST OF CHANGES MADE BY THIS TARIFF

INCREASE:

11. Rules and Regulations – Determination of Company Invested increases.
Page 12.

12. Residential Service increases.
Pages 36 and 36A.

13. Commercial & Public Authority Service increases..
Pages 41 and 42.

14. Small Volume Industrial Service (SVIS) increases..
Page 53.

15. Intermediate Volume Industrial Service (IVIS) increases..
Page 55.

16. Large Volume Industrial Service (LVIS) increases..
Pages 65 and 66A.

17. Large Industrial Service (LIS) increases.
Pages 76 and 76A.

18. Natural Gas Vehicle (NGV) rate increases.
Pages 83 and 84.

19. Monthly Metered Transportation (MMT) increases.
Pages 100 and 101.

20. Daily Metered Transportation (DMT) increases.
Pages 111 and 112.

LIST OF CHANGES MADE BY THIS TARIFF

INCREASES (continued)

21. SATC Transportation Service rate increases for Residential and Small Volume Industrial..
Pages 120 and 121.

22. POR Discounts increase for Residential and Non-Residential.
Page 125.

23. DMLMT Service Distribution charge increases. .
Page 146C.

24. Rider G- Merchant Function Charge Rider, increase in Residential Service and Non-Residential service rates.
Page 168.

25. Rider I- OPEB Temporary Surcredit increases.
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RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

3. DETERMINATION OF COMPANY INVESTMENT FOR UPGRADE/EXTENSION OF FACILITIES (Cont'd)

Determination of Justified Company Investment Per Dollar of Additional Annual Revenue

(1) Residential

The Justified Company Investment Per Dollar of Additional Annual Revenue for residential customers is $7.54. (I)

(2) Commercial and Public Authority; Industrial

The Justified Company Investment Per Dollar of Additional Annual Revenue for commercial, public authority or industrial customers shall be selected from the table below based upon the projected term of use by the customer of the new or upgraded facilities.

Projected Term of Use of New/Upgraded Facilities (Years)	Justified Company Investment Per Dollar of Additional Annual Revenue
1	$ 0.68
2	1.32
3	1.91
4	2.46
5	2.98
6	3.46
7	3.90
8	4.32
9	4.70
10	5.06
Greater than 10	7.54

(I)

Because the term of use has a substantial effect on the determination of the Justified Company Investment Per Dollar of Additional Annual Revenue, the Company may require a letter of intent from commercial, public authority and industrial customers projecting the term of use of the new or upgraded extension of facilities being requested.

The Company reserves the right to require a guaranteed revenue contract if the customer projects a term of use of the new or upgraded facilities in excess of 10 years or if the customer does not demonstrate that the customer's term of use is reasonable.

(D) Indicates Decrease

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

7. CUSTOMER'S PIPING AND EQUIPMENT

Prior to the installation of house piping by the customer in new or altered premises, inquiry shall be made of the Company to determine the requirements, sizes of pipe, quality and other specifications.

House lines, piping, connections and appliances are subject to inspection by the Company and no gas will be delivered unless all conditions are satisfactory.

The Company gives no warranty, expressed or implied, as to the adequacy or safety of any structure, equipment, piping, appliance or device owned, installed, leased or maintained by or for the customer or the owner of the premises served.

8. ACCESS TO PREMISES

The authorized agents of the Company shall, at all reasonable times, have free access to any premises supplied with gas or to which a service connection has been made, for the purpose of reading, inspecting, repairing or removing meters, piping, or other appliances therein belonging to the Company and of inspecting the piping and appliances belonging to the customer.

In furtherance of the foregoing, for purposes of this Rule No. 8, "free access" shall also mean that Company personnel are not subject to unsafe or hazardous conditions while on the premises, including without limitation, the presence of aggressive or uncontrolled animals (e.g., dogs), insect or rodent infestation, the display, use, or brandishing of firearms or other weapons in a threatening or intimating manner, presence of excrement, debris, or other rubbish, or any other circumstance that may reasonably pose a threat to the health or safety of Company employees or agents. (C)

Every industrial customer shall permit the Company, during business hours and upon reasonable notice, to inspect the customer's facilities so that the Company may determine whether facilities have been installed which would enable the customer to obtain volumes of gas without using the Company's system ("Bypass Facilities"). If a customer refuses to permit the Company to inspect the customer's facilities, it shall be presumed that Bypass Facilities have been installed.

9. INTERRUPTION OF SERVICE

In accordance with the Public Utility Code, the Company will provide service which shall be reasonably continuous and without unreasonable interruptions or delay. The Company shall not be liable, in any amount, for damages, direct or consequential, where service meets requirements of the Public Utility Code. This limitation of liability, however, shall not apply to Company conduct which is found to be willful, wanton or reckless. If the Company shall know, in advance, of an expected interruption of service, the Company will take all reasonable steps, such as personal contact, phone contact or the use of mass media, to notify affected customers of the cause and expected duration of the interruption. (C)

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

E. MISCELLANEOUS PROVISIONS

(a) Customer or a party appointed by the customer to act on Customer's behalf shall provide Company with nominations setting forth, by source, the volume to be transported by Company following procedures set forth in the Company's Operational Procedures Manual.

(b) The Customer appoints the party(ies) identified in the NFGDC Customer Agency Agreement form as its agent(s) for purposes of making such nominations and determining the proper allocation of volumes among all affected customers. All allocation methods are subject to the prior approval of Company.

(c) Deliveries of gas by or on behalf of Customer to Company at point(s) of receipt hereunder shall be made against the line pressure existing in Company's pipeline from time to time at a maximum pressure designated by Company from time to time. Company shall not be obligated to decrease such line pressure, and Customer shall not compress the gas delivered to Company without the prior approval of Company, which shall not be unreasonably withheld.

(d) Company will retain a percentage of the total volumes received by Company for the account of Customer as a loss allowance.

29. MARKET PRICE OF NATURAL GAS

For use within rate schedules in this Tariff, the Monthly Market Index ("MMI") shall be equal to the MCF equivalent of the highest volume weighted average price during the month, at Tennessee Gas Pipeline's Zone 4 200 Line Trading Hub, referred in the Platts Gas Daily ("Gas Daily") as "Tennessee Zone 4 200 leg" which will serve as the Company's Market Index Point. The Daily Market Index ("DMI") shall be equal to the MCF equivalent of the volume weighted average price for the applicable date, at the Market Index Point. (C)

Where transportation costs reflecting the cost of delivering gas to the Company's city gate are added to the MMI or the DMI to determine the market price of natural gas as applied by the Company under tariff rate schedules, such costs, unless explicitly stated otherwise, reflect the variable costs of using the associated pipeline capacity, e.g. commodity transportation rates, fuel retention and other variable usage surcharges, as applicable.

Should a price for the Market Index Point be temporarily unavailable during any period, the Company may, at its discretion, select a substitute representative price in the interim. If the Market Index Point price becomes unavailable on a permanent basis, the Company will file to change this section and may, at its discretion, select a substitute representative price in the interim, subject to refund.

30. RULES FOR MONTH END IMBALANCE RESOLUTION

The Imbalance Holder is the Customer or Supplier responsible for imbalance resolution as described in Rate Schedules MMNGS or SATS, under which the Company provides service. For the purposes herein, Imbalance Holder's gas consumption and deliveries to the Company are equivalent to the gas consumption and deliveries to the Company of the MMT or SATC Customers, respectively, for which it bears imbalance responsibility.

(C) Indicates Change

RESIDENTIAL SERVICE RATE SCHEDULE

RESIDENTIAL CLASSIFICATION

This classification shall include gas supplied for residential purposes such as a private dwelling, apartment house with a single meter supplying four or less dwelling units, separately metered apartments of a multiple dwelling, accessory buildings to dwellings or apartment houses such as garages, except at residences receiving service under Rate Schedule CAP for Low Income Residential Assistance Service and other places of residence where gas is used for residential purposes.

Churches and missions (places of worship) shall be entitled to Service under the Residential service rate schedule.

AVAILABILITY OF SERVICE

Gas Service shall be available at one location, except as otherwise provided, for residential customers.

APPLICABILITY

Applicable in all areas served under this tariff.

MONTHLY RATE

Basic Service Charge

$19.00	per Month	(I)

Distribution Charges

38.233¢	per 100 cubic feet	(I)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)
0.037¢	per 100 cubic feet	Merchant Function Charge (Rider G)
2.073¢	Per 100 cubic feet	Total Gas Adjustment Charge

(D) Indicates Decrease (I) Indicates Increase

RESIDENTIAL SERVICE RATE SCHEDULE (cont.)

Natural Gas Supply Charge			
50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	
0.915¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
52.398¢	per 100 cubic feet	Total Natural Gas Supply Charge	(I)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 1.8177% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223. The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge. Residential rate classes shall be subject to Rider F - CAP Discount Charge as set forth in this tariff. (I)

RULES AND REGULATIONS

The rules and regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

COMMERCIAL AND PUBLIC AUTHORITY SERVICE RATE SCHEDULE (cont.)

APPLICABILITY

Applicable in all areas served under this tariff.

MONTHLY RATE

For "Small" Commercial/Public Authority Customers using not more than 250,000 cubic feet per year:

Basic Service Charge			
$30.00	per Month		(I)
Distribution Charges			
33.690¢	per 100 cubic feet		(I)
Gas Adjustment Charge			
2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	
0.008¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I)
2.044¢	per 100 cubic feet	Total Gas Adjustment Charge	(I)
Natural Gas Supply Charge			
50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	
0.209¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Ride H)	
51.692¢	per 100 cubic feet	Total Natural Gas Supply Charge	(I)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.4137% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223. (I)

The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge as set forth in this tariff.

(D) Indicates Decrease (I) Indicates Increase

COMMERCIAL AND PUBLIC AUTHORITY SERVICE RATE SCHEDULE (Cont'd)

For "Small" Commercial/Public Authority Customers using greater than 250,000 cubic feet but not more than 1,000,000 cubic feet per year:

Basic Service Charge

$50.00	per Month	(I)

Distribution Charges

27.368¢	per 100 cubic feet	(I)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	
0.008¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I)
2.044¢	per 100 cubic feet	Total Gas Adjustment Charge	(I)

Natural Gas Supply Charge

50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	
0.209¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.692¢	per 100 cubic feet	Total Natural Gas Supply Charge	(I)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.4137% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223. (I)

The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge as set forth in this tariff.

(D) Indicates Decrease (I) Indicates Increase

Commercial and Public Authority Service Rate Schedule (Cont'd)

For "Large" Commercial/Public Authority Customers:

Basic Service Charge

$151.00	per Month	

Distribution Charges

24.216¢	per 100 cubic feet		(I)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	
0.008¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I)
2.044¢	per 100 cubic feet	Total Gas Adjustment Charge	(I)

Natural Gas Supply Charge

50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	
0.209¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.692¢	per 100 cubic feet	Total Natural Gas Supply Charge	(I)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.4137% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223. (I)

The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge as set forth in this tariff.

APPLICATION PERIOD

The Application Period shall be the twelve months beginning March 1 of each year.

RULES AND REGULATIONS

The Rules and Regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

(D) Indicates Decrease (I) Indicates Increase

SVIS
Small Volume Industrial Service Rate Schedule (Cont'd)

MONTHLY RATE

Basic Service Charge
$82.00 per Month

Distribution Charges
31.156¢ per 100 cubic feet (I)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	
0.008¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I)
2.044¢	per 100 cubic feet	Total Gas Adjustment Charge	(I)

Natural Gas Supply Charge

50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	
0.209¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.692¢	per 100 cubic feet	Total Natural Gas Supply Charge	(I)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.4137% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223. (I)

The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge.

APPLICATION PERIOD

The Application Period shall be the twelve months beginning March 1 of each year.

RULES AND REGULATIONS

The Rules and Regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

(D) Indicates Decrease (I) Indicates Increase

IVIS

INTERMEDIATE VOLUME INDUSTRIAL SERVICE RATE SCHEDULE (Cont'd)

MONTHLY RATE

Basic Service Charge
$252.00 per Month

Distribution Charges
20.251¢ per 100 cubic feet (I)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	
0.008¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I)
2.044¢	per 100 cubic feet	Total Gas Adjustment Charge	(I)

Natural Gas Supply Charge

50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	
0.209¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.692¢	per 100 cubic feet	Total Natural Gas Supply Charge	(I)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.4137% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223. (I)

The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge as set forth in this tariff.

APPLICATION PERIOD

The Application Period shall be the twelve months beginning March 1 of each year.

RULES AND REGULATIONS

(D) Indicates Decrease (I) Indicates Increase

LVIS
Large Volume Industrial Service (Cont'd)

C. An Industrial Customer, for which the Company estimates that the total volumes of gas purchased from the Company or transported by the Company during the next succeeding twelve months will be not less than 50,000 Mcf, if the Industrial Customer has used total volumes of gas in at least one billing month of not less than 4,167 Mcf, even if the Customer disagrees with the Company's estimate.

D. An Industrial Customer for which the Company estimates that total volumes of gas to be used by the customer during the next succeeding twelve months will not be less than 50,000 Mcf of gas per year whether the gas is purchased by the Industrial Customer from the Company, delivered by the Company to the Industrial Customer, or obtained by the customer from another source.

An Industrial Customer that meets the above criteria under this rate schedule at the beginning of an Application Period is required to continue to be subject to this rate schedule during all months of such Application Period. An Industrial Customer that meets the above criteria under this rate schedule during an Application Period is required to continue to be subject to this rate schedule during all or remaining months of such Application Period.

MONTHLY RATE

Basic Service Charge

$1,400.00	per Month	(I)

Distribution Charges

15.899	per 100 cubic feet	(I)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	
0.008¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I)
2.044¢	Per 100 cubic feet	Total Gas Adjustment Charge	(I)

(D) Indicates Decrease (I) Indicates Increase

LVIS
Large Volume Industrial Service (Cont'd)

Natural Gas Supply Charge			
50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	
0.209¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.692¢	per 100 cubic feet	Total Natural Gas Supply Charge	(I)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.4137% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223. (I)

The above non-purchased gas cost rates shall be subject to surcharges in accordance with provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge.

RULES AND REGULATIONS

The Rules and Regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

APPLICABLE PERIOD

The Application Period shall be the twelve months beginning March 1 of each year.

(D) Indicates Decrease (I) Indicates Increase

LIS
Large Industrial Service (Cont'd)

C. An Industrial Customer, for which the Company estimates that the total volumes of gas purchased from the Company or transported by the Company during the next succeeding twelve months will be not less than 200,000 Mcf, if the Industrial Customer has used total volumes of gas in at least one billing month of not less than 17,000 Mcf, even if the Customer disagrees with the Company's estimate.

An Industrial Customer that meets the above criteria under this rate schedule at the beginning of an Application Period is required to continue to be subject to this rate schedule during all months of such Application Period. An Industrial Customer that meets the above criteria under this rate schedule during an Application Period is required to continue to be subject to this rate schedule during all or remaining months of such Application Period.

MONTHLY RATE

Basic Service Charge
$1,700.00 per Month (I)

Distribution Charges
11.217¢ per 100 cubic feet (I)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	
0.008¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I)
2.044¢	per 100 cubic feet	Total Gas Adjustment Charge	(I)

(D) Indicates Decrease (I) Indicates Increase

LIS
Large Industrial Service (Cont'd)

Natural Gas Supply Charge			
50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	
0.209¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.692¢	per 100 cubic feet	Total Natural Gas Supply Charge	(I)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.4137% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223. (I)

The above non-purchased gas cost rates shall be subject to surcharges in accordance with provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge.

GAS SHORTAGE CURTAILMENT

Service under this schedule to an LIS Industrial Customer is subject to curtailment and excess consumption penalty as set forth in Rule 26 of this tariff.

RULES AND REGULATIONS

The rules and regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

Natural gas vehicle customers are classified into the following categories:

NGV(1) All natural gas vehicle customers utilizing Company owned filling facilities. A uniform rate shall be established each month within the parameters set forth above, for customers utilizing Company-owned filling facilities.

The minimum NGV(1) rate shall be:	$0.58969/Ccf	(I)
The current components of the minimum NGV(1) rate are as follows:		
100% load factor base cost of gas:	$0.44533/Ccf	
Incremental operating cost of Company owned NGV compression equipment:	$0.13436/Ccf	
Transition Cost Surcharge	$0.00000/Ccf	
State Tax Adjustment Surcharge	$0.00000/Ccf	(I)
Minimum allowable Non-Gas cost	$0.01000/Ccf	
The maximum NGV(1) rate shall be:	$0.91388/Ccf	(I)
The current components of the maximum NGV(1) rate are as follows:		
Tailblock rate of the Commercial and Public Authority Service Rate schedule:	$0.77952/Ccf	(I)
Incremental operating cost of Company owned NGV compression equipment:	$0.13436/Ccf	
State Tax Adjustment Surcharge	$0.00000/Ccf	(I)

NGV(2) Natural gas vehicle customers utilizing customer owned filling facilities. A uniform rate will be established each month within the parameters set forth above, to customers utilizing customer owned filling facilities.

The minimum NGV(2) rate shall be:	$0.45533/Ccf	(I)
The current components of the minimum NGV(2) rate are as follows:		
100% load factor base cost of gas:	$0.44533/Ccf	
Transition Cost Surcharge	$0.00000/Ccf	
State Tax Adjustment Surcharge	$0.00000/Ccf	(I)
Minimum allowable Non-Gas cost	$0.01000/Ccf	
The maximum NGV(2) rate shall be:	$0.77952/Ccf	(I)

(D) Indicates Decrease (I) Indicates Increase

The current components of the maximum NGV(2) rate are as follows:

Tailblock rate of the Commercial and Public Authority Service Rate schedule:	$0.77952/Ccf	(I)
State Tax Adjustment Surcharge	$0.00000/Ccf	(I)

V. SURCHARGE

All non-purchased gas cost charges under this rate schedule will be subject to surcharges in accordance with provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge as set forth in this tariff.

VI. AMOUNTS TO BE INCLUDED IN OVER/UNDERCOLLECTION OF GAS COSTS

Purchased gas cost revenues billed under this rate schedule shall be included as revenues for recovery of gas costs for purposes of computing Factor "E" of Company's 1307(f) rate in accordance with procedures set forth in Rider "A" - section 1307(f) Purchased Gas Costs. Purchased gas cost revenues recovered under this rate schedule shall be the 100% load factor base cost of gas as defined above.

VII. RULES AND REGULATIONS

The rules and regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

RATE SCHEDULE FOR MONTHLY METERED TRANSPORTATION SCHEDULE (cont'd)

MONTHLY RATES

Commodity Rates

The commodity rates set forth below contain a component, presently $0.4900 per Mcf, for recovery of purchased gas costs.

For transportation of gas to Residential Customers, the monthly rate for transportation of gas both within and outside the Commonwealth of Pennsylvania shall be:

$3.8680 (I)

For transportation of gas to Commercial and Public Authority Customers, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (C)

$3.4137 per Mcf for Small Commercial/Public Authority using not more than 250 Mcf per year (I)
$2.7815 per Mcf for Small Commercial/Public Authority using greater than 250 Mcf but not more than 1,000 Mcf per year (I)
$2.4663 per Mcf for Large Commercial/Public Authority (I)

For transportation of gas to Small Volume Industrial Customers, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (C)

$3.1603 per Mcf for SVIS Customers (I)

(D) Indicates Decrease (I) Indicates Increase

RATE SCHEDULE FOR MONTHLY METERED TRANSPORTATION SCHEDULE (cont'd)

For transportation of gas to Intermediate Volume Industrial Customers, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (C)
$2.0698 per Mcf for IVIS Customers (I)

For transportation of gas to Large Volume Industrial Customers and any entity that is not a Gas Service Customer, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (C)

$1.6346 per Mcf (I)

For transportation of gas to Large Industrial Customers, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (C)

$1.1664 per Mcf (I)

Provided, however, that the Company, in its sole discretion, may reduce by contract the portion of the above rates applicable to the Customer that are for recovery of gas or the portion of the rate for recovery of non-gas costs of service if it is reasonably necessary to do so to meet competition from another supplier of energy including gas from another supplier of gas that has constructed, or could construct, facilities to deliver supplies of gas to a MMT Customer of the Company without use of the Company's facilities or another transportation of gas. The Company may also reduce or eliminate the compensation for line losses provided for in Special Provisions paragraph B of this rate schedule in order to meet the competitive circumstances for alternate fuels or bypass situations cited above excluding competition from other Pennsylvania local distribution companies. The Company will reduce the applicable rate only if:

(a) Either (1) the MMT Customer has facilities in place and operable to use an alternative fuel or obtain gas from an alternative supplier or (2) in the Company's judgment, such facilities would be constructed;

(D) Indicates Decrease (I) Indicates Increase

be subject to refund under any circumstances. As deemed necessary by the Company in its sole discretion, the DMT customer shall be required also to pay, in full, for costs of installing daily metering and communications equipment selected by the Company which will enable the Company to obtain each day meter readings of the volume of gas delivered to the Company or to another point or points acceptable to the Company for the Customer's account and the volume of gas from the Company used by the Customer each day. In addition, with regard to daily metering and communications equipment, the Customer shall pay an amount of money to provide for recovery of the present value of the carrying cost of income taxes on the payment for daily metering and communications equipment. Such carrying cost arises from the delay between federal and Pennsylvania income taxation and income tax deductions over the tax life of the equipment and a further amount equal to 72.67% of the carrying cost (based on present income tax rates). If additional facilities are required for furnishing of gas service, customer's payment for additional facilities required for furnishing of gas service shall be governed by Tariff Rule No. 3, "Extension of Facilities", and Tariff Rule No. 5, "Service Lines."

Existing customers that have telecommunication equipment installed are responsible for the operating costs associated with any third-party telecommunication or meter data collection services necessary for the Company to provide service until such telecommunication equipment needs to be replaced. The Company will be responsible for the operating costs associated with third-party telecommunication equipment for new customers or when a customer requires new telecommunication equipment.

CHARACTER OF SERVICE

Gas, of a quality acceptable to the Company, owned by a DMT Service Customer and delivered, either directly or by displacement, into the Company's distribution system, will be transported, by the Company, to the delivery point designated by the DMT Service Customer.

The Customer must have installed the necessary electronic equipment, acceptable to the Company on all of the meters for the Customer’s account, which allows the Company to monitor the Customer’s daily usage of gas. Existing customers that have telecommunication equipment installed are responsible for the operating costs associated with any third-party telecommunication or meter data collection services necessary for the Company to provide service until such telecommunication equipment needs to be replaced. The Company will be responsible for the operating costs associated with third-party telecommunication equipment for new customers or when a customer requires new telecommunication equipment.

(Continued)

Customer may designate a NGS (the "DMT Supplier" or "DMT Aggregator") to be responsible for all balancing requirements, supply nominations and additionally, to aggregate any imbalances hereunder with similarly situated customers. If the DMT Supplier is not the Customer hereunder, service under this schedule shall be contingent on the Company's receipt of the DMT Supplier's signed acknowledgement of the rules and regulations governing DMT service. (C)

TERM OF SERVICE AGREEMENT

If the requirements of this Rate Schedule are met, the Company shall offer to enter into a Service Agreement with an initial term of at least one year and successive one-year terms thereafter. The initial term of a Service Agreement may be for less than one year only with the mutual consent of both the DMT Service Customer and the Company. If the initial term of a Service Agreement is for less than one year, successive terms thereafter shall be equal in length to the initial term. Either the DMT Service Customer or the Company may terminate the Service Agreement at the end of a term upon written notice thereof to the other more than thirty (30) days prior to the end of a term; further provided, however, that the Company may terminate a Service Agreement at an earlier date as provided by law by provisions of this Tariff.

(C) Indicates Change

RATE SCEHDULE FOR DAILY METERED TRANSPORTATION SERVICE (cont'd)

MONTHLY RATES

Commodity Rates

For transportation of gas to Residential customers, the monthly rate for transportation of gas both within and outside the Commonwealth of Pennsylvania shall be:

(I)

$3.3780 per Mcf.

For transportation of gas to Commercial and Public Authority Customers, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (C)

$2.9237 per Mcf	for Small Commercial/Public Authority using not more than 250 Mcf per year	(I)
$2.2915 per Mcf	for Small Commercial/Public Authority using greater than 250 Mcf but not more than 1,000 Mcf per year	(I)
$1.9763 per Mcf	for Large Commercial/Public Authority	(I)

For transportation of gas to Small Volume Industrial Customers, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (C)

$2.6703 per Mcf for SVIS Customers. (I)

(I)

For transportation of gas to Intermediate Volume Industrial Customers, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be:

$1.5798 per Mcf for IVIS Customers. (I)

RATE SCHEDULE FOR DAILY METERED TRANSPORTATION SERVICE (cont'd)

For transportation of gas to Intermediate Volume Industrial Customers, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (C)

$1.5798 per Mcf for IVIS Customers. (I)

For transportation of gas to Large Volume Industrial Customers and any entity that is not a Gas Service Customer, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (C)

$1.1446 per Mcf. (I)

For transportation of gas to Large Industrial Customers, the monthly rate for transportation of gas produced within the Commonwealth of Pennsylvania shall be:

$0.6764 per Mcf. (I)

Provided, however, that the Company, in its sole discretion, may reduce by contract the portion of the above rates applicable to the Customer that is for recovery of gas costs or the portion of the rate for recovery of non-gas costs of service if it is reasonably necessary to do so to meet competition from another supplier of energy including gas from another supplier of gas that has constructed, or could construct, facilities to deliver supplies of gas to a Gas Service Customer of the Company without use of the Company's facilities or another transporter of gas. The Company may also reduce or eliminate the compensation for line losses provided for in Special Provisions paragraph B of this rate schedule in order to meet the competitive circumstances for alternate fuels or bypass situations cited above excluding competition from other Pennsylvania local distribution companies. The Company will reduce the applicable rate only if:

(a) Either (1) the Customer has facilities in place and operable to use an alternative fuel or obtain gas from an alternative supplier or (2) in the Company's judgment, such facilities would be constructed;

RATE SCHEDULE SATC
SMALL AGGREGATION TRANSPORTATION CUSTOMER SERVICE (Cont.)

1. Residential Transportation Rates

SATC Customers that meet the qualifications under the Residential Service Rate Schedule classification:

Rates per Residential SATC Customer per Month:

$19.00	Basic Service Charge	(I)
$0.38233	per 100 cubic feet	(I)

2. Commercial and Public Authority Transportation Rates

SATC Customers that meet the qualifications under the Commercial and Public Authority Service Rate Schedule classification:

a. Rates per Commercial/Public Authority customer per month for "Small" Commercial/Public Customers using not more than 250,000 cubic feet per year:

$30.00	Basic Service Charge	
$0.33690	per 100 cubic feet	(I)

b. Rates per Commercial/Public Authority customer per month for "Small" Commercial/Public Customers using greater than 250,000 cubic feet but not more than 1,000,000 cubic feet per year:

$50.00	Basic Service Charge	
$0.27368	per 100 cubic feet	(I)

c. Rates per Commercial/Public Authority customer per month for "Large" Commercial/Public Customers:

$151.00	Basic Service Charge	
$0.24216	per 100 cubic feet	(I)

(D) Indicates Decrease (I) Indicates Increase

RATE SCHEDULE SATC
SMALL AGGREGATION TRANSPORTATION CUSTOMER SERVICE (Cont.)

3. Small Volume Industrial Service Transportation Rates

SATC Customers that meet the qualifications under the Small Volume Industrial Service Rate Schedule classification:

Rates per Small Volume Industrial Service SATC Customer per Month:

$82.00	Basic Service Charge	(I)
$0.31156	per 100 cubic feet	(I)

4. Intermediate Volume Industrial Service Transportation Rates

SATC Customers that meet the qualifications under the Intermediate Volume Industrial Service Rate Schedule classification:

Rates per Intermediate Volume Industrial Service SATC Customer per Month:

$252.00	Basic Service Charge	
$0.20251	per 100 cubic feet	(I)

B. Miscellaneous Customer Surcharges

1. Residential rate classes shall be subject to surcharges in accordance with Rider F - CAP Discount Charge as set forth in this tariff.

2. The above non-purchased gas cost SATC rates shall be subject to surcharges in accordance with provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge.

(D) Indicates Decrease (I) Indicates Increase

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

1. Billing Service Charges

For a pilot period of three years, terminable by the Company at the end of the third year following 12 months prior notice to participating Suppliers, the Company will purchase amounts receivable for SATC customers with annual consumption less than 1,000 Mcf/year as described herein and further detailed in the billing agreement.

The rate to be charged by the Company to the Supplier for Standard Billing Service shall be $0.20 for each bill rendered to an SATC Customer for the Supplier.

The Company shall provide the Supplier receiving Standard Billing Service with meter reading information and other reports in the Company's standard electronic format on a basis corresponding to the SATC Customer's billing cycles. The Supplier shall provide the Company with all required Supplier billing and rate information necessary for customer billing as determined by the Company. The Supplier shall provide such billing information in the Company's required format. The Supplier shall provide Supplier billing information no later than three business days before the last day of the month.

The Company will bill the SATC Customer for gas supplies sold by the Supplier to the Customer subject to the Supplier entering into a billing service contract with the Company. For Consolidated billing service where the Company does not purchase the Supplier's receivable payments made by the Customer under the billing service will be applied first to amounts to past service due under an amortization agreement with the Company, next to current bills due to the Company, next to gas supply charges owed to the Supplier, next to charges for other non-regulated service charges, and lastly to any "neighbor for neighbor" contribution. The terms and charges for the Supplier billing services other than Standard Billing Services may be negotiated between the Company and the Supplier. The Company shall be under no obligation to provide the Supplier billing services other than Standard Billing Services if mutually agreeable terms and charges cannot be negotiated.

The Company will purchase the accounts receivable from POR Suppliers servicing SATC Residential, SATC Small Commercial and Public Authority customers less than 250 Mcf/year, SATC Small Commercial and Public Authority customers between 250 and 1,000 Mcf/year and SATC Small Volume Industrial customers less than 1,000 Mcf/year at a discount where the Company is providing a Utility Consolidated Bill to the customer. The residential discount is 1.8806% and the non-residential discount is 0.4766%. (I)

To the extent that a POR customer account has an unpaid balance on its final bill's late payment date or at the time the unpaid account balance is transferred to another active account, the Company will deduct from the payment to the POR SATS Supplier for the purchase of its receivable the unpaid billed amounts in excess of the amount that would have been due had the customer received service at Distribution's otherwise applicable sales rate during the time the customer received service from the SATS Supplier (pursuant to Rate Schedule SATC Section F "Lesser of Calculation").

(C) Indicates Change

RATE SCHEDULE FOR DAILY METERED LARGE MANUFACTURING TRANSPORTATION SERVICE
(cont'd)

MONTHLY RATES

For transportation of gas to Large Industrial Manufacturing Customers, the monthly rate for transportation shall be:

$0.6764 per Mcf. (I)

Provided, however, that the Company, in its sole discretion, may reduce by contract the portion of the above rates applicable to the Customer that is for recovery of gas costs or the portion of the rate for recovery of non-gas costs of service if it is reasonably necessary to do so to meet competition from another supplier of energy including gas from another supplier of gas that has constructed, or could construct, facilities to deliver supplies of gas to a Gas Service Customer of the Company without use of the Company's facilities or another transportation of gas. The Company will reduce the applicable rate only if:

(a) Either (1) the Customer has facilities in place and operable to use an alternative fuel or obtain gas from an alternative supplier or (2) in the Company's judgment, such facilities would be constructed;

(b) Volumes of gas that would be transported by the Company would be displaced by an alternate fuel or an alternative source of gas unless the Company reduces its transportation rate;

(c) The Company will not reduce the rate for transportation service below the level necessary to transport gas; and

(d) In the Company's judgment the DMLMT Service Customer has taken all reasonable steps to minimize the cost of gas supplies delivered to the Company's system in order to help meet competition.

Where the above criteria are met, the Company may, in its discretion enter into an agreement setting either: (1) a fixed transportation rate or (2) the basis for determining the transportation rate, for the period of the Service Agreement, which will specify which portion of the rate is being reduced.

Volumes delivered as transportation service pursuant to this rate schedule shall be subject to State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge

CHARGES FOR TRANSPORTATION BY OTHERS

If furnishing service, pursuant to this Rate Schedule, requires the use of a transportation service provided other than by the Company, any cost incurred by the Company, with regard thereto, shall be billed to DMLMT Service Customer by the Company.

RIDER B

STATE TAX ADJUSTMENT SURCHARGE

In addition to the charges provided in this tariff, a surcharge of (0.00)% will apply to all non-Purchased Gas Cost charges for service rendered on or after March 29, 2026. (D)

The above surcharge will be recomputed using the same elements prescribed by the Commission.

a. Whenever any of the tax rates used in calculation of the surcharge are changed;

b. Whenever the utility makes effective an increase or decrease in base rates, exclusive of Purchased Gas Cost rates and applicable Rider rates.

c. On March 31, 1971, and each year thereafter.

The above recalculation will be submitted to the Commission within one (1) day after the occurrence of the event or date which occasions such recomputation; and, if the recomputed surcharge is less than the one in effect, the Company will, and if the recomputed surcharge is more than the one then in effect, the Company may submit with such recomputation a tariff or supplement to reflect such recomputed surcharge, the effective date of which shall be one (1) day after filing.

In Compliance with P-2017-2591001 Order entered October 5, 2017, the Company shall file its State Tax Adjustment Surcharge filings on one day’s notice.

RIDER C
WEATHER NORMALIZATION ADJUSTMENT

Applicability and Purpose:

A Weather Normalization Adjustment ("WNA") shall be applied to bills of customers served under Residential, CAP, and Commercial and Public Authority Rate Schedules, for any bills rendered during the heating season October through May.

Calculation of Adjustment Amount:
The WNA will be applied to October through May billing cycles and shall be calculated on a customer account specific basis in accordance with the formula below:

WNBC = BLMC + [((NHDD +/- (NHDD x 3%)) / AHDD) x (AMC - BLMC)]
WNAC = WNBC - AMC
WNA = WNAC x Distribution Charge

(a) Weather Normalized Billing Ccfs("WNBC") will be calculated as the Base Load Monthly Ccfs ("BLMC") added to the product of the Normal Heating Degree Days ("NHDD"), adjusted for a 3% deadband as further discussed below, divided by the Actual Heating Degree Days ("AHDD") and the Actual Monthly Ccfs ("AMC") less the BLMC. Weather Normalized Billing Ccfs (WNBC) will only be calculated if the AMC exceeds the BLMC. WNA will not be applicable for the billing period if AMC is less than the BLMC.

(b) BLMC shall be established for each customer using the customer's actual consumption from the billing system, measured in Ccfs.

(c) AMC shall be measured for each customer and billing cycle and will be based on actual or estimated meter readings.

(d) NHDD shall be based upon the 10-year average (2015-2024) for the given day, as reported by the National Oceanic and Atmospheric Administration (NOAA) for the Erie International Airport weather station.

(e) AHDD shall be the actual experienced heating degree days during the billing cycle. AHDD shall be based upon experienced actual Gas Day temperatures as reported by the NOAA for the Erie International Airport weather station.

(f) AMC will be subtracted from the WNBC to compute the Weather Normalized Adjustment Ccfs ("WNAC").

(g) The WNAC shall then be multiplied by the applicable Rate Schedule Distribution Charge based on service rendered to compute the WNA amount that will be charged or credited to each customer.

(C) Indicates Change

RIDER D
ENERGY EFFICIENCY program COST RECOVERY

Program Description

National Fuel's Energy Efficiency Program ("EE Program") is an equipment replacement program to encourage customers to install high efficiency equipment by offering rebate incentives. The eligible market for these rebates includes all existing residential customers, as well as existing homes converting from an alternate fuel source, who are replacing eligible equipment. This Energy Efficiency Cost Recovery Program ("Program") shall recover costs related to the Company's EE Program.

EE Program Charge

The EE Program Charge will be added to the delivery rates of the Residential customer class served under the Residential Service, Low-Income Residential Assistance, Monthly Metered Transportation, Daily Metered Transportation, and Small Aggregation Transportation Customer Service (SATC) Rate Schedules as follows:

EE Program Charge: $0.0389/Mcf

Determination of EE Program Charge

The EE Program Charge shall be determined as follows:

1. Costs to be recovered shall include Company incurred costs to implement its Commission approved EE Program during each plan year (January 1 – December 31), including all costs incurred to develop and administer the EE Program.

2. The EE Program Charge shall be calculated in accordance with the formula below and shall be rounded to the fourth decimal:

   EE Program Charge = Projected EE Costs / Projected Residential Class Usage (Mcf)

3. Net over or under collection of the EE Program Charge will result from the difference between the EE Program revenues received and the EE Program costs incurred. This reconciliation will be completed at the end of the 5-year program.

(C) Indicates Change

Rider G
Merchant Function Charge (MFC) Rider

Applicability:

The Merchant Function Charge (MFC) shall be added to the Natural Gas Supply Charge and Gas Adjustment Charge of Residential, CAP, Commercial and Public Authority, SVIS, IVIS, LVIS and LIS rate schedules.

Such charges shall be updated quarterly and effective each February 1, May 1, August 1, and November 1 of the year. The charge will also be updated whenever there is a change to the Sales Service Rate Customer Charge, Distribution Charge, Natural Gas Supply Charge or Gas Adjustment Charge.

Calculation of Rate:

For customers receiving service in the Residential classification, the MFC shall equal 1.8177% times the Natural Gas Supply Charge and the Gas Adjustment Clause as calculated for Rider A. (I)

The current Residential MFC Charge is:

Natural Gas Supply Charge per Mcf	$0.0915	(I)
Gas Adjustment clause (E-Factor) per Mcf	$0.0037	
Total Residential MFC per Mcf	$0.0952	(I)

For customers receiving service in the Non-Residential classifications, the MFC shall equal 0.4137% times the Natural Gas Supply Charge and Gas Adjustment Clause as calculated for Rider A. (I)

The current Non-Residential MFC Charge is:

Natural Gas Supply Charge per Mcf	$0.0209	(I)
Gas Adjustment clause (E-Factor) per Mcf	$0.0008	(I)
Total Non-Residential MFC per Mcf	$0.0217	(I)

(D) Indicates Decrease (I) Indicates Increase

Rider H
Gas Procurement Charge (GPC)

APPLICABILITY

Effective June 1, 2013, the Gas Procurement Charge will be included in the Natural Gas Supply Charge of Residential, CAP, Commercial and Public Authority, SVIS, IVIS, LVIS and LIS rate schedules.

The charge is designed to recover the costs of procuring natural gas pursuant to 52 Pa. Code §62.223. The natural gas procurement costs included in the GPC charge will only be updated in a base rate case.

The GPC to be included in the Natural Gas Supply Charge shall be $0.1149 / Mcf and is not reconcilable.

Price To Compare Component	Residential (¢ per 100 cubic feet)	Non Residential (¢ per 100 cubic feet)	
Natural Gas Supply Charge			
Purchased Gas Cost Component (Rider A)	50.334	50.334	
Merchant Function Charge associated with Natural Gas Supply Charge(Rider G)	0.915	0.209	(I)
Gas Procurement Charge (Rider H)	1.149	1.149	
Subtotal Natural Gas Supply Charge	52.398	51.692	(I)
Gas Adjustment Charge			
Purchased Gas Cost Component (Rider A)	2.036	2.036	
Merchant Function Charge associated with Gas Adjustment Charge (Rider G)	0.037	0.008	
Subtotal Gas Adjustment Charge	2.073	2.044	(I)
Total Price To Compare	54.471	53.736	(I)

(D) Indicates Decrease (I) Indicates Increase

RESERVED FOR FUTURE USE

RIDER I OPEB TEMPORARY SURCREDIT

Effective November 1, 2026, a one-time bill credit will be applied to confirmed low-income customers and a surcredit will be included in the rates subject to this Rider to provide for the pass back of funds collected previously for Other Post Retirement Benefits ("OPEB") expenses that have been deferred for the benefit of ratepayers as a regulatory liability in accordance with the settlement order in Docket # R-00061493. (C)

$1,000,000 of the OPEB regulatory liability has been reserved to pass back to confirmed low income customers as a one-time bill credit. The bill credit will be applied to customers' bills for active accounts as of November 1, 2026 and in the following amounts per class:

Low Income Residential $30

An additional $6,159,000 of the OPEB regulatory liability has been reserved to pass back via a surcredit over 1-year.The surcredit will apply as a credit to all customer bills at a set allocation percentage equal to the allocation percentage of the Company's base rate increase in Docket # R-00061493 among the various customer classes, exclusive of STAS and automatic adjustment clause revenues, for bills rendered for intrastate service on and after November 1, 2026. The surcredit will be applied on a per Mcf basis, by service class, as indicated in the table below. The surcredit will continue for a period of 1 year without reconciliation. Interest is not applicable to the OPEB balance. (C)

Service Class	Refund Rate Effective 11/1/26	
Sales & SATC		
Residential (RSS & CAP)	($0.23165)	(I)
Small Comm./Public Authority < 250	($0.10725)	(I)
Small Comm./Public Authority > 250	($0.13102)	(I)
Large Comm./Public Authority	($0.10905)	(I)
Small Volume Industrial Service	($0.06729)	(I)
Intermediate Vol. Industrial Service	($0.15068)	(I)
MMT & DMT		
Residential	($0.11746)	(I)
Small Comm./Public Authority < 250	($0.08139)	(I)
Small Comm./Public Authority > 250	($0.11037)	(I)
Large Comm./Public Authority	($0.12923)	(I)
Small Volume Industrial Service	($0.02266)	(I)
Intermediate Vol. Industrial Service	($0.06409)	(I)
Large Volume Industrial Service	($0.07557)	(I)
Large Industrial Service	($0.04715)	(I)

RESERVED FOR FUTURE USE

DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC)

In addition to the net charges provided for in this Tariff, a charge of 0.00% will apply consistent with the Commission Order dated December 5, 2024 at Docket No. P-2022-3034957, approving the DSIC. (D)

1. General Description

A. Purpose: To recover the reasonable and prudent costs incurred to repair, improve, or replace eligible property which is completed and placed in service and recorded in the individual accounts, as noted below, between base rate cases and to provide the Utility with the resources to accelerate the replacement of aging infrastructure, to comply with evolving regulatory requirements and to develop and implement solutions to regional supply problems.

The costs of extending facilities to serve new customers are not recoverable through the DSIC.

B. Eligible Property: The DSIC-eligible property will consist of the following:

- Piping (accounts 365, 367, 374, 376);
- Couplings (account 376);
- Gas services lines (account 380) and insulated and non-insulated fittings (account 378);
- Valves (account 376);
- Excess flow valves (account 376);
- Risers (account 376);
- Meter bars (account 382);
- Meters (account 381);
- Measuring and Regulator Stations (accounts 334,366, 369, 375, 378, 381, 384)
- Industrial and Farm Tap Measuring and Regulating Equipment (account 385)
- Unreimbursed costs related to highway relocation projects where a natural gas distribution company or city natural gas distribution operation must relocate its facilities; and
- Other related capitalized costs (accounts 392, 396, and other misc accounts) (C)

C. Effective Date: The DSIC will become effective January 1, 2026. (C)

2. Computation of the DSIC

A. Calculation: The initial DSIC, effective January 1, 2025 shall be calculated to recover the fixed costs of eligible plant additions that have not previously been reflected in the Utility's rates or rate base and will have been placed in service between October 1 to November 30, 2024.

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

3. DETERMINATION OF COMPANY INVESTMENT FOR UPGRADE/EXTENSION OF FACILITIES (Cont'd)

~~C.~~ Determination of Justified Company Investment Per Dollar of Additional Annual Revenue

(1) Residential

The Justified Company Investment Per Dollar of Additional Annual Revenue for residential customers is $7.546~~.93~~. (I)

(2) Commercial and Public Authority; Industrial

The Justified Company Investment Per Dollar of Additional Annual Revenue for commercial, public authority or industrial customers shall be selected from the table below based upon the projected term of use by the customer of the new or upgraded facilities.

Projected Term of Use of New/Upgraded Facilities (Years)	Justified Company Investment Per Dollar of Additional Annual Revenue
1	$ 0.6863
2	1.3221
3	1.9176
4	2.4627
5	2.9874
6	3.4618
7	3.903~~.59~~
8	4.323~~.97~~
9	4.704~~.32~~
10	5.064~~.65~~
Greater than 10	~~6~~7.54~~.93~~

(I)

Because the term of use has a substantial effect on the determination of the Justified Company Investment Per Dollar of Additional Annual Revenue, the Company may require a letter of intent from commercial, public authority and industrial customers projecting the term of use of the new or upgraded extension of facilities being requested.

The Company reserves the right to require a guaranteed revenue contract if the customer projects a term of use of the new or upgraded facilities in excess of 10 years or if the customer does not demonstrate that the customer's term of use is reasonable.

(D) Indicates Decrease

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont'd)

7. CUSTOMER'S PIPING AND EQUIPMENT

Prior to the installation of house piping by the customer in new or altered premises, inquiry shall be made of the Company to determine the requirements, sizes of pipe, quality and other specifications.

House lines, piping, connections and appliances are subject to inspection by the Company and no gas will be delivered unless all conditions are satisfactory.

The Company gives no warranty, expressed or implied, as to the adequacy or safety of any structure, equipment, piping, appliance or device owned, installed, leased or maintained by or for the customer or the owner of the premises served.

8. ACCESS TO PREMISES

The authorized agents of the Company shall, at all reasonable times, have free access to any premises supplied with gas or to which a service connection has been made, for the purpose of reading, inspecting, repairing or removing meters, piping, or other appliances therein belonging to the Company and of inspecting the piping and appliances belonging to the customer.

In furtherance of the foregoing, for purposes of this Rule No. 8, "free access" shall also mean that Company personnel are not subject to unsafe or hazardous conditions while on the premises, including without limitation, the presence of aggressive or uncontrolled animals (e.g., dogs), insect or rodent infestation, the display, use, or brandishing of firearms or other weapons in a threatening or intimating manner, presence of excrement, debris, or other rubbish, or any other circumstance that may reasonably pose a threat to the health or safety of Company employees or agents. (C)

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Every industrial customer shall permit the Company, during business hours and upon reasonable notice, to inspect the customer's facilities so that the Company may determine whether facilities have been installed which would enable the customer to obtain volumes of gas without using the Company's system ("Bypass Facilities"). If a customer refuses to permit the Company to inspect the customer's facilities, it shall be presumed that Bypass Facilities have been installed.

9. INTERRUPTION OF SERVICE

In accordance with the Public Utility Code, the Company will provide service which shall be reasonably continuous and without unreasonable interruptions or delay. The Company shall not be liable, in any amount, for damages, direct or consequential, where service meets requirements of the Public Utility Code. This limitation of liability, however, shall not apply to Company conduct which is found to be willful, wanton or reckless. If the Company shall know, in advance, of an expected interruption of service, the Company will take all reasonable steps, such as personal contact, phone contact or the use of mass media, to notify affected customers of the cause and expected duration of the interruption.

RULES AND REGULATIONS APPLYING TO ALL TERRITORIES SERVED (Cont')

E. MISCELLANEOUS PROVISIONS

(a) Customer or a party appointed by the customer to act on Customer's behalf shall provide Company with nominations setting forth, by source, the volume to be transported by Company following procedures set forth in the Company's Operational Procedures Manual.

(b) The Customer appoints the party(ies) identified in the NFGDC Customer Agency Agreement form as its agent(s) for purposes of making such nominations and determining the proper allocation of volumes among all affected customers. All allocation methods are subject to the prior approval of Company.

(c) Deliveries of gas by or on behalf of Customer to Company at point(s) of receipt hereunder shall be made against the line pressure existing in Company's pipeline from time to time at a maximum pressure designated by Company from time to time. Company shall not be obligated to decrease such line pressure, and Customer shall not compress the gas delivered to Company without the prior approval of Company, which shall not be unreasonably withheld.

(d) Company will retain a percentage of the total volumes received by Company for the account of Customer as a loss allowance.

29. MARKET PRICE OF NATURAL GAS

For use within rate schedules in this Tariff, the Monthly Market Index ("MMI") shall be equal to the MCF equivalent of the highest volume weighted average price during the month, at Tennessee Gas Pipeline's Zone 4 200 Line Trading Hub, referred in the ~~SNL Natural Gas Index~~Platts Gas Daily ("~~SNL~~Gas Daily") as "~~TGP~~Tennessee Zone 4 200 leg~~L~~" which will serve as the Company's Market Index Point. The Daily Market Index ("DMI") shall be equal to the MCF equivalent of the volume weighted average price for the applicable date, at the Market Index Point. (C)

Where transportation costs reflecting the cost of delivering gas to the Company's city gate are added to the MMI or the DMI to determine the market price of natural gas as applied by the Company under tariff rate schedules, such costs, unless explicitly stated otherwise, reflect the variable costs of using the associated pipeline capacity, e.g. commodity transportation rates, fuel retention and other variable usage surcharges, as applicable. ~~(C)~~

Should a price for the Market Index Point be temporarily unavailable during any period, the Company may, at its discretion, select a substitute representative price in the interim. If the Market Index Point price becomes unavailable on a permanent basis, the Company will file to change this section and may, at its discretion, select a substitute representative price in the interim, subject to refund.

30. RULES FOR MONTH END IMBALANCE RESOLUTION

The Imbalance Holder is the Customer or Supplier responsible for imbalance resolution as described in Rate Schedules MMNGS or SATS, under which the Company provides service. For the purposes herein, Imbalance Holder's gas consumption and deliveries to the Company are equivalent to the gas consumption and deliveries to the Company of the MMT or SATC Customers, respectively, for which it bears imbalance responsibility.

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RESIDENTIAL SERVICE RATE SCHEDULE

RESIDENTIAL CLASSIFICATION

This classification shall include gas supplied for residential purposes such as a private dwelling, apartment house with a single meter supplying four or less dwelling units, separately metered apartments of a multiple dwelling, accessory buildings to dwellings or apartment houses such as garages, except at residences receiving service under Rate Schedule CAPLIRAS for Low Income Residential Assistance Service and other places of residence where gas is used for residential purposes.

Churches and missions (places of worship) shall be entitled to Service under the Residential service rate schedule.

AVAILABILITY OF SERVICE

Gas Service shall be available at one location, except as otherwise provided, for residential customers.

APPLICABILITY

Applicable in all areas served under this tariff.

MONTHLY RATE

Basic Service Charge

$19.0014.00 per Month (I)

Distribution Charges

38.23334.064¢ per 100 cubic feet (ID)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.037¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(D)
2.073¢	Per 100 cubic feet	Total Gas Adjustment Charge	(D)

(D) Indicates Decrease (I) Indicates Increase

RESIDENTIAL SERVICE RATE SCHEDULE (cont.)

Natural Gas Supply Charge			
50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.915907¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(ID)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
52.398390¢	per 100 cubic feet	Total Natural Gas Supply Charge	(ID)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 1.81778032% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223. The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC - Distribution System Improvement Charge. Residential rate classes shall be subject to Rider F - CAP Discount Charge as set forth in this tariff. (I)

RULES AND REGULATIONS

The rules and regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

(D) Indicates Decrease (I) Indicates Increase

COMMERCIAL AND PUBLIC AUTHORITY SERVICE RATE SCHEDULE (cont.)

APPLICABILITY

Applicable in all areas served under this tariff.

MONTHLY RATE

For "Small" Commercial/Public Authority Customers using not more than 250,000 cubic feet per year:

Basic Service Charge

$3027.00	per Month	(I)

Distribution Charges

33.69027.47¢	per 100 cubic feet	(ID)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.0087¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(ID)
2.0443¢	per 100 cubic feet	Total Gas Adjustment Charge	(ID)

Natural Gas Supply Charge

50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.209171¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(ID)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Ride H)	
51.692654¢	per 100 cubic feet	Total Natural Gas Supply Charge	(ID)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.413733398% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223. (I)

The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge as set forth in this tariff.

COMMERCIAL AND PUBLIC AUTHORITY SERVICE RATE SCHEDULE (Cont'd)

For "Small" Commercial/Public Authority Customers using greater than 250,000 cubic feet but not more than 1,000,000 cubic feet per year:

Basic Service Charge

$5037.00	per Month	(I)

Distribution Charges

27.36825.00 8¢	per 100 cubic feet	(ID)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.0087¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(ID)
2.0443¢	per 100 cubic feet	Total Gas Adjustment Charge	(ID)

Natural Gas Supply Charge

50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.209171¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(ID)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.69254¢	per 100 cubic feet	Total Natural Gas Supply Charge	(ID)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.413733398% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223. (I)

The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC - Distribution System Improvement Charge as set forth in this tariff.

Commercial and Public Authority Service Rate Schedule (Cont'd)

For "Large" Commercial/Public Authority Customers:

Basic Service Charge
$151.00 per Month

Distribution Charges
24.216~~21.07~~ ~~5~~¢ per 100 cubic feet (I~~D~~)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	~~(D)~~
0.0087¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I~~D~~)
2.0443¢	per 100 cubic feet	Total Gas Adjustment Charge	(I~~D~~)

Natural Gas Supply Charge

50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	~~(D)~~
0.209~~171~~¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I~~D~~)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.692~~54~~¢	per 100 cubic feet	Total Natural Gas Supply Charge	(I~~D~~)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.4137~~3398~~% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223. (I)

The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC - Distribution System Improvement Charge as set forth in this tariff.

APPLICATION PERIOD

The Application Period shall be the twelve months beginning March 1 of each year.

RULES AND REGULATIONS

The Rules and Regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

(D) Indicates Decrease (I) Indicates Increase

SVIS
Small Volume Industrial Service Rate Schedule (Cont'd)

MONTHLY RATE

Basic Service Charge
$82.00 per Month

Distribution Charges
31.15625.17 5¢ per 100 cubic feet (I/D)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.0087¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I/D)
2.0443¢	per 100 cubic feet	Total Gas Adjustment Charge	(I/D)

Natural Gas Supply Charge

50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.209171¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I/D)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.69254¢	per 100 cubic feet	Total Natural Gas Supply Charge	(I/D)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.413733398% (I) and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223.

The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge.

APPLICATION PERIOD

The Application Period shall be the twelve months beginning March 1 of each year.

RULES AND REGULATIONS

The Rules and Regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

(D) Indicates Decrease (I) Indicates Increase

IVIS
INTERMEDIATE VOLUME INDUSTRIAL SERVICE RATE SCHEDULE (Cont'd)

MONTHLY RATE

Basic Service Charge
$252.00 per Month

Distribution Charges
20.25117.800¢ per 100 cubic feet (ID) (I)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.0087¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(ID)
2.0443¢	per 100 cubic feet	Total Gas Adjustment Charge	(ID)

Natural Gas Supply Charge

50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.209171¢	per 100 cubic feet (ID)	Merchant Function Charge (Rider G)	(I)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.692654¢	per 100 cubic feet	Total Natural Gas Supply Charge	(ID)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.4137 3398% (I) and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223.

The above non-purchased gas cost rates shall be subject to surcharges in accordance with the provisions of Rider B - State Tax Adjustment Surcharge and DSIC - Distribution System Improvement Charge as set forth in this tariff.

APPLICATION PERIOD

The Application Period shall be the twelve months beginning March 1 of each year.

RULES AND REGULATIONS

(D) Indicates Decrease (I) Indicates Increase

LVIS
Large Volume Industrial Service (Cont'd)

C. An Industrial Customer, for which the Company estimates that the total volumes of gas purchased from the Company or transported by the Company during the next succeeding twelve months will be not less than 50,000 Mcf, if the Industrial Customer has used total volumes of gas in at least one billing month of not less than 4,167 Mcf, even if the Customer disagrees with the Company's estimate.

D. An Industrial Customer for which the Company estimates that total volumes of gas to be used by the customer during the next succeeding twelve months will not be less than 50,000 Mcf of gas per year whether the gas is purchased by the Industrial Customer from the Company, delivered by the Company to the Industrial Customer, or obtained by the customer from another source.

An Industrial Customer that meets the above criteria under this rate schedule at the beginning of an Application Period is required to continue to be subject to this rate schedule during all months of such Application Period. An Industrial Customer that meets the above criteria under this rate schedule during an Application Period is required to continue to be subject to this rate schedule during all or remaining months of such Application Period.

MONTHLY RATE

Basic Service Charge
$1,400.001,023.00 per Month (I)

Distribution Charges
15.89914.696¢ per 100 cubic feet (ID)

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.0087¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(ID)
2.0443¢	Per 100 cubic feet	Total Gas Adjustment Charge	(ID)

(D) Indicates Decrease (I) Indicates Increase

LVIS
Large Volume Industrial Service (Cont'd)

Natural Gas Supply Charge			
50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.209171¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(ID)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.69254¢	per 100 cubic feet	Total Natural Gas Supply Charge	(ID)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.413733398% (I) and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223.

The above non-purchased gas cost rates shall be subject to surcharges in accordance with provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge.

RULES AND REGULATIONS

The Rules and Regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

APPLICABLE PERIOD

The Application Period shall be the twelve months beginning March 1 of each year.

(D) Indicates Decrease (I) Indicates Increase

LIS

Large Industrial Service (Cont'd)

C. An Industrial Customer, for which the Company estimates that the total volumes of gas purchased from the Company or transported by the Company during the next succeeding twelve months will be not less than 200,000 Mcf, if the Industrial Customer has used total volumes of gas in at least one billing month of not less than 17,000 Mcf, even if the Customer disagrees with the Company's estimate.

An Industrial Customer that meets the above criteria under this rate schedule at the beginning of an Application Period is required to continue to be subject to this rate schedule during all months of such Application Period. An Industrial Customer that meets the above criteria under this rate schedule during an Application Period is required to continue to be subject to this rate schedule during all or remaining months of such Application Period.

MONTHLY RATE

Basic Service Charge
$1,700165 per Month (I)
.00

Distribution Charges
11.21710. per 100 cubic feet (I)
446¢

Gas Adjustment Charge

2.036¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.0087¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(I)
2.0443¢	per 100 cubic feet	Total Gas Adjustment Charge	(I)

Issued: ~~October 31, 2025~~ January 28, 2026 Effective: ~~November 1, 2025~~ March 29, 2026

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LIS
Large Industrial Service (Cont'd)

Natural Gas Supply Charge			
50.334¢	per 100 cubic feet	Purchased Gas Cost Component (Rider A)	(D)
0.209171¢	per 100 cubic feet	Merchant Function Charge (Rider G)	(ID)
1.149¢	per 100 cubic feet	Gas Procurement Charge (Rider H)	
51.69254¢	per 100 cubic feet	Total Natural Gas Supply Charge	(ID)

The Natural Gas Supply Charge shall include a Merchant Function Charge (Rider G) to recover uncollectible costs associated with purchase gas costs of 0.413733398% and the Gas Procurement Charge (Rider H) to recover costs of procuring natural gas pursuant to 52 Pa. Code §62.223. (I)

The above non-purchased gas cost rates shall be subject to surcharges in accordance with provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge.

GAS SHORTAGE CURTAILMENT

Service under this schedule to an LIS Industrial Customer is subject to curtailment and excess consumption penalty as set forth in Rule 26 of this tariff.

RULES AND REGULATIONS

The rules and regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

(D) Indicates Decrease (I) Indicates Increase

Natural gas vehicle customers are classified into the following categories:

NGV(1) All natural gas vehicle customers utilizing Company owned filling facilities. A uniform rate shall be established each month within the parameters set forth above, for customers utilizing Company-owned filling facilities.

The minimum NGV(1) rate shall be:	$0.5896958869/Ccf	(ID)
The current components of the minimum NGV(1) rate are as follows:		
100% load factor base cost of gas:	$0.44533/Ccf	(D)
Incremental operating cost of Company owned NGV compression equipment:	$0.13436/Ccf	
Transition Cost Surcharge	$0.00000/Ccf	
State Tax Adjustment Surcharge	$0.00000(0.00100)/Ccf	(IDI)
Minimum allowable Non-Gas cost	$0.01000/Ccf	
The maximum NGV(1) rate shall be:	$0.9138888058/Ccf	(ID)
The current components of the maximum NGV(1) rate are as follows:		
Tailblock rate of the Commercial and Public Authority Service Rate schedule:	$0.7795274772/Ccf	(ID)
Incremental operating cost of Company owned NGV compression equipment:	$0.13436/Ccf	
State Tax Adjustment Surcharge	$(0.00000150)/Ccf	(IDI)

NGV(2) Natural gas vehicle customers utilizing customer owned filling facilities. A uniform rate will be established each month within the parameters set forth above, to customers utilizing customer owned filling facilities.

The minimum NGV(2) rate shall be:	$0.45533456/Ccf	(ID)
The current components of the minimum NGV(2) rate are as follows:		
100% load factor base cost of gas:	$0.44533/Ccf	(D)
Transition Cost Surcharge	$0.00000/Ccf	
State Tax Adjustment Surcharge	(0.00077)0.00000/Ccf	(I)
Minimum allowable Non-Gas cost	$0.01000/Ccf	
The maximum NGV(2) rate shall be:	$0.7795274645/Ccf	(ID)

(D) Indicates Decrease (I) Indicates Increase

The current components of the maximum NGV(2) rate are as follows:

Tailblock rate of the Commercial and Public Authority Service Rate schedule:	$0.7795~~74772~~/Ccf	(I)
State Tax Adjustment Surcharge	$0.00000~~(0.00127)~~/Ccf	(I)

V. SURCHARGE

All non-purchased gas cost charges under this rate schedule will be subject to surcharges in accordance with provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge as set forth in this tariff.

VI. AMOUNTS TO BE INCLUDED IN OVER/UNDERCOLLECTION OF GAS COSTS

Purchased gas cost revenues billed under this rate schedule shall be included as revenues for recovery of gas costs for purposes of computing Factor "E" of Company's 1307(f) rate in accordance with procedures set forth in Rider "A" - section 1307(f) Purchased Gas Costs. Purchased gas cost revenues recovered under this rate schedule shall be the 100% load factor base cost of gas as defined above.

VII. RULES AND REGULATIONS

The rules and regulations set forth in this tariff shall govern, where applicable, the supply of gas service under this rate schedule.

RATE SCHEDULE FOR MONTHLY METERED TRANSPORTATION SCHEDULE (cont'd)

MONTHLY RATES

Commodity Rates

The commodity rates set forth below contain a component, presently $0.4900 per Mcf, for recovery of purchased gas costs. (I)

For transportation of gas to Residential Customers, the monthly rate for transportation of gas both within and outside the Commonwealth of Pennsylvania shall be:

$3.45113.8680$3.4511 Mcf (I)

For transportation of gas to Commercial and Public Authority Customers, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (C)

$3.41372.7894 per Mcf for Small Commercial/Public Authority using not more than 250 Mcf per year (I)
$2.78152.5455 per Mcf for Small Commercial/Public Authority using greater than 250 Mcf but not more than 1,000 Mcf per year (I)
$2.46632.1522 per Mcf for Large Commercial/Public Authority (I)

For transportation of gas to Commercial and Public Authority Customers, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:

$2.7894 per Mcf for Small Commercial/Public Authority using not more than 250 Mcf per year (I)
$2.5455 per Mcf for Small Commercial/Public Authority using greater than 250 Mcf but not more than 1,000 Mcf per year (I)
$2.1522 per Mcf for Large Commercial/Public Authority (I)

For transportation of gas to Small Volume Industrial Customers, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (C)

$3.16032.5622 per Mcf for SVIS Customers (I)

For transportation of gas to Small Volume Industrial Customers, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:

$32.5622 per Mcf for SVIS Customers (I)

(D) Indicates Decrease (I) Indicates Increase

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RATE SCHEDULE FOR MONTHLY METERED TRANSPORTATION SCHEDULE (cont'd)

For transportation of gas to Intermediate Volume Industrial Customers, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (I) (C)

$2.06981.8247 per Mcf for IVIS Customers (I)

~~For transportation of gas to Intermediate Volume Industrial Customers, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:~~

~~$1.8247 per Mcf for IVIS Customers~~ (I)

For transportation of gas to Large Volume Industrial Customers and any entity that is not a Gas Service Customer, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (C)

$1.63461.5143 per Mcf (I)

~~For transportation of gas to Large Volume Industrial Customers and any entity that is not a Gas Service Customer, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:~~

~~$1.5143 per Mcf~~ (I)

For transportation of gas to Large Industrial Customers, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (C)

$1.16641.8093 per Mcf (I)

~~For transportation of gas to Large Industrial Customers, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:~~

~~$1.8093 per Mcf~~ (I)

Provided, however, that the Company, in its sole discretion, may reduce by contract the portion of the above rates applicable to the Customer that are for recovery of gas or the portion of the rate for recovery of non-gas costs of service if it is reasonably necessary to do so to meet competition from another supplier of energy including gas from another supplier of gas that has constructed, or could construct, facilities to deliver supplies of gas to a MMT Customer of the Company without use of the Company's facilities or another transportation of gas. The Company may also reduce or eliminate the compensation for line losses provided for in Special Provisions paragraph B of this rate schedule in order to meet the competitive circumstances for alternate fuels or bypass situations cited above excluding competition from other Pennsylvania local distribution companies. The Company will reduce the applicable rate only if:

(a) Either (1) the MMT Customer has facilities in place and operable to use an alternative fuel or obtain gas from an alternative supplier or (2) in the Company's judgment, such facilities would be constructed;

(D) Indicates Decrease (I) Indicates Increase

~~TERM OF SERVICE AGREEMENT~~

be subject to refund under any circumstances. As deemed necessary by the Company in its sole discretion, the DMT customer shall be required also to pay, in full, for costs of installing daily metering and communications equipment selected by the Company which will enable the Company to obtain each day meter readings of the volume of gas delivered to the Company or to another point or points acceptable to the Company for the Customer's account and the volume of gas from the Company used by the Customer each day. In addition, with regard to daily metering and communications equipment, the Customer shall pay an amount of money to provide for recovery of the present value of the carrying cost of income taxes on the payment for daily metering and communications equipment. Such carrying cost arises from the delay between federal and Pennsylvania income taxation and income tax deductions over the tax life of the equipment and a further amount equal to 72.67% of the carrying cost (based on present income tax rates). If additional facilities are required for furnishing of gas service, customer's payment for additional facilities required for furnishing of gas service shall be governed by Tariff Rule No. 3, "Extension of Facilities", and Tariff Rule No. 5, "Service Lines."

Existing customers that have telecommunication equipment installed are responsible for the operating costs associated with any third-party telecommunication or meter data collection services necessary for the Company to provide service until such telecommunication equipment needs to be replaced. The Company will be responsible for the operating costs associated with third-party telecommunication equipment for new customers or when a customer requires new telecommunication equipment. (C)

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CHARACTER OF SERVICE

Gas, of a quality acceptable to the Company, owned by a DMT Service Customer and delivered, either directly or by displacement, into the Company's distribution system, will be transported, by the Company, to the delivery point designated by the DMT Service Customer.

The Customer must have installed the necessary electronic equipment, acceptable to the Company on all of the meters for the Customer's account, which allows the Company to monitor the Customer's daily usage of gas. Existing customers that have telecommunication equipment installed are responsible for the operating costs associated with any third-party telecommunication or meter data collection services necessary for the Company to provide service until such telecommunication equipment needs to be replaced. The Company will be responsible for the operating costs associated with third-party telecommunication equipment for new customers or when a customer requires new telecommunication equipment. (C)

~~If the requirements of this Rate Schedule are met, the Company shall offer to enter into a Service Agreement with an initial term of at least one year and successive one-year terms thereafter. The initial term of a Service Agreement may be for less than one year only with the mutual consent of both the DMT Service Customer and the Company. If the initial term of a Service Agreement is for less than one year, successive terms thereafter shall be equal in length to the initial term. Either the DMT Service Customer or the Company may terminate the Service Agreement at the end of a term upon written notice thereof to the other more than thirty (30) days prior to the end of a term; further provided, however, that the Company may terminate a Service Agreement at an earlier date as provided by law by provisions of this Tariff.~~

~~(C) Indicates Change~~

(Continued)

Customer may designate a NGS (the "DMT Supplier" or "DMT Aggregator") to be responsible for all balancing requirements, supply nominations and additionally, to aggregate any imbalances hereunder with similarly situated customers. If the DMT Supplier is not the Customer hereunder, service under this schedule shall be contingent on the Company's receipt of the DMT Supplier's signed acknowledgement of the rules and regulations governing DMT service. (C)

TERM OF SERVICE AGREEMENT

If the requirements of this Rate Schedule are met, the Company shall offer to enter into a Service Agreement with an initial term of at least one year and successive one-year terms thereafter. The initial term of a Service Agreement may be for less than one year only with the mutual consent of both the DMT Service Customer and the Company. If the initial term of a Service Agreement is for less than one year, successive terms thereafter shall be equal in length to the initial term. Either the DMT Service Customer or the Company may terminate the Service Agreement at the end of a term upon written notice thereof to the other more than thirty (30) days prior to the end of a term; further provided, however, that the Company may terminate a Service Agreement at an earlier date as provided by law by provisions of this Tariff.

(C) Indicates Change

RATE SCEHDULE FOR DAILY METERED TRANSPORTATION SERVICE (cont'd)

MONTHLY RATES

Commodity Rates
For transportation of gas to Residential customers, the monthly rate for transportation of gas both within and outside the Commonwealth of Pennsylvania shall be: (I)

$3.37802.9611 per Mcf.

For transportation of gas to Commercial and Public Authority Customers, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (C)

$2.92372.2994 per Mcf	for Small Commercial/Public Authority using not more than 250 Mcf per year	(ID)
$2.29152.0555 per Mcf	for Small Commercial/Public Authority using greater than 250 Mcf but not more than 1,000 Mcf per year	(I)
$1.97631.6622 per Mcf	for Large Commercial/Public Authority	(I)

~~For transportation of gas to Commercial and Public Authority Customers, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:~~

~~$2.2994 per Mcf~~	~~for Small Commercial/Public Authority using not more than 250 Mcf per Year~~	(ID)
~~$2.0555 per Mcf~~	~~for Small Commercial/Public Authority using greater than 250 Mcf but not more than 1,000 Mcf per year~~	~~(I)~~
~~$1.6622 per Mcf~~	~~for Large Commercial/Public Authority~~	~~(I)~~

For transportation of gas to Small Volume Industrial Customers, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (C)

$2.67032.0722 per Mcf for SVIS Customers. (ID)

~~For transportation of gas to Small Volume Industrial Customers, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:~~

~~$2.0722 per Mcf for SVIS Customers.~~ (ID)

For transportation of gas to Intermediate Volume Industrial Customers, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be:

$1.57981.3347 per Mcf for IVIS Customers. (I)

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RATE SCHEDULE FOR DAILY METERED TRANSPORTATION SERVICE (cont'd)

For transportation of gas to Intermediate Volume Industrial Customers, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (C)

$1.57981.3347 per Mcf for IVIS Customers. (I)

For transportation of gas to Large Volume Industrial Customers and any entity that is not a Gas Service Customer, the monthly rate for transportation of gas produced within or outside the Commonwealth of Pennsylvania shall be: (C)

$1.14461.0243 per Mcf. (I)

For transportation of gas to Large Volume Industrial Customers and any entity that is not a Gas Service Customer, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:

$ 1.0243 per Mcf. (I)

For transportation of gas to Large Industrial Customers, the monthly rate for transportation of gas produced within the Commonwealth of Pennsylvania shall be:

$0.67640.5993 per Mcf. (I)

For transportation of gas to Large Industrial Customers, the monthly rate for transportation of gas produced outside the Commonwealth of Pennsylvania shall be:

$0.5993 per Mcf. (I)

Provided, however, that the Company, in its sole discretion, may reduce by contract the portion of the above rates applicable to the Customer that is for recovery of gas costs or the portion of the rate for recovery of non-gas costs of service if it is reasonably necessary to do so to meet competition from another supplier of energy including gas from another supplier of gas that has constructed, or could construct, facilities to deliver supplies of gas to a Gas Service Customer of the Company without use of the Company's facilities or another transporter of gas. The Company may also reduce or eliminate the compensation for line losses provided for in Special Provisions paragraph B of this rate schedule in order to meet the competitive circumstances for alternate fuels or bypass situations cited above excluding competition from other Pennsylvania local distribution companies. The Company will reduce the applicable rate only if:

(a) Either (1) the Customer has facilities in place and operable to use an alternative fuel or obtain gas from an alternative supplier or (2) in the Company's judgment, such facilities would be constructed;

Commented [DK1]: Need increase for the basic service charge lines

RATE SCHEDULE SATC
SMALL AGGREGATION TRANSPORTATION CUSTOMER SERVICE (Cont.)

1. Residential Transportation Rates

SATC Customers that meet the qualifications under the Residential Service Rate Schedule classification:

Rates per Residential SATC Customer per Month:

$19.0014.00	Basic Service Charge	(I)
$0.3823334064	per 100 cubic feet	(ID)

2. Commercial and Public Authority Transportation Rates

SATC Customers that meet the qualifications under the Commercial and Public Authority Service Rate Schedule classification:

a. Rates per Commercial/Public Authority customer per month for "Small" Commercial/Public Customers using not more than 250,000 cubic feet per year:

$3027.00	Basic Service Charge	
$0.3369027447	per 100 cubic feet	(ID)

b. Rates per Commercial/Public Authority customer per month for "Small" Commercial/Public Customers using greater than 250,000 cubic feet but not more than 1,000,000 cubic feet per year:

$5037.00	Basic Service Charge	
$0.2736825008	per 100 cubic feet	(ID)

c. Rates per Commercial/Public Authority customer per month for "Large" Commercial/Public Customers:

$151.00	Basic Service Charge	
$0.2421621075	per 100 cubic feet	(ID)

(D) Indicates Decrease (I) Indicates Increase

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RATE SCHEDULE SATC
SMALL AGGREGATION TRANSPORTATION CUSTOMER SERVICE (Cont.)

3. Small Volume Industrial Service Transportation Rates

SATC Customers that meet the qualifications under the Small Volume Industrial Service Rate Schedule classification:

Rates per Small Volume Industrial Service SATC Customer per Month:

$82.00	Basic Service Charge	(I)
$0.3115625175	per 100 cubic feet	(ID)

4. Intermediate Volume Industrial Service Transportation Rates

SATC Customers that meet the qualifications under the Intermediate Volume Industrial Service Rate Schedule classification:

Rates per Intermediate Volume Industrial Service SATC Customer per Month:

$252.00	Basic Service Charge	
$0.2025117800	per 100 cubic feet	(ID)

B. Miscellaneous Customer Surcharges

1. Residential rate classes shall be subject to surcharges in accordance with Rider F - CAP Discount Charge as set forth in this tariff.

2. The above non-purchased gas cost SATC rates shall be subject to surcharges in accordance with provisions of Rider B - State Tax Adjustment Surcharge and DSIC – Distribution System Improvement Charge.

(D) Indicates Decrease (I) Indicates Increase

RATE SCHEDULE SATS
SMALL AGGREGATION TRANSPORTATION SUPPLIER SERVICE (Cont.)

1. Billing Service Charges

For a pilot period of three years, terminable by the Company at the end of the third year following 12 months prior notice to participating Suppliers, the Company will purchase amounts receivable for SATC customers with annual consumption less than 1,000 Mcf/year as described herein and further detailed in the billing agreement.

The rate to be charged by the Company to the Supplier for Standard Billing Service shall be $0.20 for each bill rendered to an SATC Customer for the Supplier.

The Company shall provide the Supplier receiving Standard Billing Service with meter reading information and other reports in the Company's standard electronic format on a basis corresponding to the SATC Customer's billing cycles. The Supplier shall provide the Company with all required Supplier billing and rate information necessary for customer billing as determined by the Company. The Supplier shall provide such billing information in the Company's required format. The Supplier shall provide Supplier billing information no later than three business days before the last day of the month.

The Company will bill the SATC Customer for gas supplies sold by the Supplier to the Customer subject to the Supplier entering into a billing service contract with the Company. For Consolidated billing service where the Company does not purchase the Supplier's receivable payments made by the Customer under the billing service will be applied first to amounts to past service due under an amortization agreement with the Company, next to current bills due to the Company, next to gas supply charges owed to the Supplier, next to charges for other non-regulated service charges, and lastly to any "neighbor for neighbor" contribution. The terms and charges for the Supplier billing services other than Standard Billing Services may be negotiated between the Company and the Supplier. The Company shall be under no obligation to provide the Supplier billing services other than Standard Billing Services if mutually agreeable terms and charges cannot be negotiated.

The Company will purchase the accounts receivable from POR Suppliers servicing SATC Residential, SATC Small Commercial and Public Authority customers less than 250 Mcf/year, SATC Small Commercial and Public Authority customers between 250 and 1,000 Mcf/year and SATC Small Volume Industrial customers less than 1,000 Mcf/year at a discount where the Company is providing a Utility Consolidated Bill to the customer. The residential discount is 1.8806661% and the non-residential discount is 0.47664027%. (I) (ID)

To the extent that a POR customer account has an unpaid balance on its final bill's late payment date or at the time the unpaid account balance is transferred to another active account, the Company will deduct from the payment to the POR SATS Supplier for the purchase of its receivable the unpaid billed amounts in excess of the amount that would have been due had the customer received service at Distribution's otherwise applicable sales rate during the time the customer received service from the SATS Supplier (pursuant to Rate Schedule SATC Section F "Lesser of Calculation").

(C) Indicates Change

RATE SCHEDULE FOR DAILY METERED LARGE MANUFACTURING TRANSPORTATION SERVICE
(cont'd)

MONTHLY RATES

For transportation of gas to Large Industrial Manufacturing Customers, the monthly rate for transportation shall be:

$0.67645993 per Mcf. (I)

Provided, however, that the Company, in its sole discretion, may reduce by contract the portion of the above rates applicable to the Customer that is for recovery of gas costs or the portion of the rate for recovery of non-gas costs of service if it is reasonably necessary to do so to meet competition from another supplier of energy including gas from another supplier of gas that has constructed, or could construct, facilities to deliver supplies of gas to a Gas Service Customer of the Company without use of the Company's facilities or another transportation of gas. The Company will reduce the applicable rate only if:

(a) Either (1) the Customer has facilities in place and operable to use an alternative fuel or obtain gas from an alternative supplier or (2) in the Company's judgment, such facilities would be constructed;

(b) Volumes of gas that would be transported by the Company would be displaced by an alternate fuel or an alternative source of gas unless the Company reduces its transportation rate;

(c) The Company will not reduce the rate for transportation service below the level necessary to transport gas; and

(d) In the Company's judgment the DMLMT Service Customer has taken all reasonable steps to minimize the cost of gas supplies delivered to the Company's system in order to help meet competition.

Where the above criteria are met, the Company may, in its discretion enter into an agreement setting either: (1) a fixed transportation rate or (2) the basis for determining the transportation rate, for the period of the Service Agreement, which will specify which portion of the rate is being reduced.

Volumes delivered as transportation service pursuant to this rate schedule shall be subject to State Tax Adjustment Surcharge and DSIC - Distribution System Improvement Charge (C)

CHARGES FOR TRANSPORTATION BY OTHERS

If furnishing service, pursuant to this Rate Schedule, requires the use of a transportation service provided other than by the Company, any cost incurred by the Company, with regard thereto, shall be billed to DMLMT Service Customer by the Company.

RIDER B

STATE TAX ADJUSTMENT SURCHARGE

In addition to the charges provided in this tariff, a surcharge of (0.0017)% will apply to all non-Purchased Gas Cost charges for service rendered on or after March 29, 2026October 1, 2025. (D) (C)

The above surcharge will be recomputed using the same elements prescribed by the Commission.

a. Whenever any of the tax rates used in calculation of the surcharge are changed;

b. Whenever the utility makes effective an increase or decrease in base rates, exclusive of Purchased Gas Cost rates and applicable Rider rates.

c. On March 31, 1971, and each year thereafter.

The above recalculation will be submitted to the Commission within one (1) day after the occurrence of the event or date which occasions such recomputation; and, if the recomputed surcharge is less than the one in effect, the Company will, and if the recomputed surcharge is more than the one then in effect, the Company may submit with such recomputation a tariff or supplement to reflect such recomputed surcharge, the effective date of which shall be one (1) day after filing.

In Compliance with P-2017-2591001 Order entered October 5, 2017, the Company shall file its State Tax Adjustment Surcharge filings on one day's notice.

RIDER C
WEATHER NORMALIZATION ADJUSTMENT

Applicability and Purpose:

A Weather Normalization Adjustment ("WNA") shall be applied to bills of customers served under Residential, CAP, and Commercial and Public Authority Rate Schedules, for any bills rendered during the heating season October through May. ~~(C)~~

Calculation of Adjustment Amount:
The WNA will be applied to October through May billing cycles and shall be calculated on a customer account specific basis in accordance with the formula below:

WNBC = BLMC + [((NHDD +/- (NHDD x 3%)) / AHDD) x (AMC - BLMC)]
WNAC = WNBC - AMC
WNA = WNAC x Distribution Charge

(a) Weather Normalized Billing Ccfs("WNBC") will be calculated as the Base Load Monthly Ccfs ("BLMC") added to the product of the Normal Heating Degree Days ("NHDD"), adjusted for a 3% deadband as further discussed below, divided by the Actual Heating Degree Days ("AHDD") and the Actual Monthly Ccfs ("AMC") less the BLMC. Weather Normalized Billing Ccfs (WNBC) will only be calculated if the AMC exceeds the BLMC. WNA will not be applicable for the billing period if AMC is less than the BLMC.

(b) BLMC shall be established for each customer using the customer's actual consumption from the billing system, measured in Ccfs.

(c) AMC shall be measured for each customer and billing cycle and will be based on actual or estimated meter readings.

(d) NHDD shall be based upon the 10~~5~~-year average (2015~~06~~-2024~~20~~) for the given day, as reported by the National Oceanic and Atmospheric Administration (NOAA) for the Erie International Airport weather station.

(e) AHDD shall be the actual experienced heating degree days during the billing cycle. AHDD shall be based upon experienced actual Gas Day temperatures as reported by the NOAA for the Erie International Airport weather station.

(f) AMC will be subtracted from the WNBC to compute the Weather Normalized Adjustment Ccfs ("WNAC").

(g) The WNAC shall then be multiplied by the applicable Rate Schedule Distribution Charge based on service rendered to compute the WNA amount that will be charged or credited to each customer.

(C) Indicates Change

RIDER D
ENERGY EFFICIENCY ProgramCOST RECOVERY

Program Description

National Fuel's Energy Efficiency Program ("EE Program") is an equipment replacement program to encourage customers to install high efficiency equipment by offering rebate incentives. The eligible market for these rebates includes all existing residential customers, as well as existing homes converting from an alternate fuel source, who are replacing eligible equipment. This Energy Efficiency Cost Recovery Program ("Program") shall recover costs related to the Company's EE Program. (C)

EE Program Charge

The EE Program Charge will be added to the delivery rates of the Residential customer class served under the Residential Service, Low-Income Residential Assistance, Monthly Metered Transportation, Daily Metered Transportation, and Small Aggregation Transportation Customer Service (SATC) Rate Schedules as follows: (C)

EE Program Charge: $0.0389/Mcf (C)

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Determination of EE Program Charge

The EE Program Charge shall be determined as follows:

1. Costs to be recovered shall include Company incurred costs to implement its Commission approved EE Program during each plan year (January 1 – December 31), including all costs incurred to develop and administer the EE Program. (C)

2. The EE Program Charge shall be calculated in accordance with the formula below and shall be rounded to the fourth decimal: (C)

   EE Program Charge = Projected EE Costs / Projected Residential Class Usage (Mcf)

3. Net over or under collection of the EE Program Charge will result from the difference between the EE Program revenues received and the EE Program costs incurred. This reconciliation will be completed at the end of the 5-year program. (C)

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(C) Indicates Change

Issued: January 28, 2026~~July 26, 2023~~ Effective: March 29, 2026~~August 1, 2023~~

~~(C)~~

Rider G
Merchant Function Charge (MFC) Rider

Applicability:

The Merchant Function Charge (MFC) shall be added to the Natural Gas Supply Charge and Gas Adjustment Charge of Residential, CAP, Commercial and Public Authority, SVIS, IVIS, LVIS and LIS rate schedules.

Such charges shall be updated quarterly and effective each February 1, May 1, August 1, and November 1 of the year. The charge will also be updated whenever there is a change to the Sales Service Rate Customer Charge, Distribution Charge, Natural Gas Supply Charge or Gas Adjustment Charge.

Calculation of Rate:

For customers receiving service in the Residential classification, the MFC shall equal 1.81771.8032% times the Natural Gas Supply Charge and the Gas Adjustment Clause as calculated for Rider A. (I)

The current Residential MFC Charge is:

Natural Gas Supply Charge per Mcf	$0.091507	(ID)
Gas Adjustment clause (E-Factor) per Mcf	$0.0037	(D)
Total Residential MFC per Mcf	$0.095244	(DI)

For customers receiving service in the Non-Residential classifications, the MFC shall equal 0.413733398% times the Natural Gas Supply Charge and Gas Adjustment Clause as calculated for Rider A. (I)

The current Non-Residential MFC Charge is:

Natural Gas Supply Charge per Mcf	$0.0209 0171	(ID)
Gas Adjustment clause (E-Factor) per Mcf	$0.00087	(ID)
Total Non-Residential MFC per Mcf	$0.0217 0178	(ID)

(D) Indicates Decrease (I) Indicates Increase

Rider H
Gas Procurement Charge (GPC)

APPLICABILITY

Effective June 1, 2013, the Gas Procurement Charge will be included in the Natural Gas Supply Charge of Residential, CAP, Commercial and Public Authority, SVIS, IVIS, LVIS and LIS rate schedules.

The charge is designed to recover the costs of procuring natural gas pursuant to 52 Pa. Code §62.223. The natural gas procurement costs included in the GPC charge will only be updated in a base rate case.

The GPC to be included in the Natural Gas Supply Charge shall be $0.1149 / Mcf and is not reconcilable.

Price To Compare Component	Residential (¢ per 100 cubic feet)	Non Residential (¢ per 100 cubic feet)	
Natural Gas Supply Charge			
Purchased Gas Cost Component (Rider A)	50.334	50.334	(D)
Merchant Function Charge associated with Natural Gas Supply Charge(Rider G)	0.91507	0.209171	(I/D)
Gas Procurement Charge (Rider H)	1.149	1.149	
Subtotal Natural Gas Supply Charge	52.3980	51.69254	(I/D)
Gas Adjustment Charge			
Purchased Gas Cost Component (Rider A)	2.036	2.036	(D)
Merchant Function Charge associated with Gas Adjustment Charge (Rider G)	0.037	0.0087	(D)
Subtotal Gas Adjustment Charge	2.073	2.0443	(I/D)
Total Price To Compare	54.471~~63~~	53.7~~697~~36	(I/D)

(D) Indicates Decrease (I) Indicates Increase

NATIONAL FUEL GAS
DISTRIBUTION CORPORATION

Supplement No. 29488 to
Gas – Pa. P.U.C. No. 9
TwelfthEleventh Revised Page No. 170
Canceling EleventhTenth Revised Page
No. 170

~~TCJA TEMPORARY SURCHARGE~~

~~To implement the effects of the Tax Cuts and Jobs Act (TCJA), on March 15, 2018 the Pennsylvania Public Utility Commission (Commission) issued a Temporary Rates Order at Docket No. M-2018-2641242 directing the utility to file its current base rates and riders as temporary rates, pursuant to Section 1310(d) of the Public Utility Code. 66 Pa. C.S. § 1310(d). Subsequently, on May 17, 2018, the Commission entered Orders in the above case and at Docket No. R-2018-3000527 superseding the March 15, 2018 Temporary Rates Order directing the utility to establish temporary rates as follows:~~

~~A negative surcharge will apply as a credit to all customer bills at an equal percentage of non-gas revenue among the various customer classes, exclusive of STAS and automatic adjustment clause revenues, for bills rendered for intrastate service. The credit will be applied on a per Mcf basis, by service class, as indicated in the table below. The total credits provided to customers through this negative surcharge will be reconciled with actual differences in federal income tax expense of a pre- and post-TCJA basis and will remain in place until the Company files and the Commission approves new base rates for the utility pursuant to Section 1308(d) that include the effects of the TCJA tax rate changes. The Company's last Base Rate Case at Docket # R-2022-3035730 included the effects of the TCJA tax rate change. Interest on over or under collections shall be computed monthly at the residential mortgage lending rate specified by the Secretary of Banking in accordance with the Loan Interest and Protection Law (41 P.S. §§ 101, et seq.) from the month that the over or under collection occurs to the mid-point of the recovery period. Upon determination that the negative surcharge, if left unchanged, would result in a material over or under collection, the Company may file with the Commission, on at least 10 days' notice, for an interim revision of the TCJA Temporary Surcharge. The TCJA Temporary Surcharge will be filed with the Commission by September 1 of each year to become effective the following October 1, reflecting estimated TCJA savings for the fiscal year.~~

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~~Service Class~~	~~Total Rate $ / MCF~~
~~Sales & SATC~~	
~~Residential (RSS & CAP)~~	~~$0.00000~~
~~Small Comm./Public Authority < 250~~	~~$0.00000~~
~~Small Comm./Public Authority > 250~~	~~$0.00000~~
~~Large Comm./Public Authority~~	~~$0.00000~~
~~Small Volume Industrial Service~~	~~$0.00000~~
~~Inter. Vol. Industrial Service~~	~~$0.00000~~
~~MMT & DMT~~	
~~Residential~~	~~$0.00000~~
~~Small Comm./Public Authority < 250~~	~~$0.00000~~
~~Small Comm./Public Authority > 250~~	~~$0.00000~~
~~Large Comm./Public Authority~~	~~$0.00000~~
~~Small Volume Industrial Service~~	~~$0.00000~~
~~Inter. Vol. Industrial Service~~	~~$0.00000~~
~~Large Volume Industrial Service~~	~~$0.00000~~
~~Large Industrial Service~~	~~$0.00000~~

Issued: January

28, 2026~~August 22, 2025~~

Effective: March 29, 2026~~October 1, 2025~~

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RIDER I OPEB TEMPORARY SURCREDIT

Effective NovemberOctober 1, 20261, a one-time bill credit will be applied to confirmed low-income customers and a surcredit will be included in the rates subject to this Rider to provide for the pass back of funds collected previously for Other Post Retirement Benefits ("OPEB") expenses that have been deferred for the benefit of ratepayers as a regulatory liability in accordance with the settlement order in Docket # R-00061493. (C)

$125,000,000 of the OPEB regulatory liability has been reserved to pass back to confirmed low income customers as a one-time bill credit. The bill credit will be applied to customers' bills for active accounts as of NovemberOctober 1, 20261 and in the following amounts per class: (C)

Low Income Residential $30100
C/PA $250
Industrial $1,500

An additional $6,159,00029,000,000 of the OPEB regulatory liability has been reserved to pass back via a surcredit over 15-year.s ($5,800,000 per year). The surcredit will apply as a credit to all customer bills at a set allocation percentage equal to the allocation percentage of the Company's base rate increase in Docket # R-00061493 among the various customer classes, exclusive of STAS and automatic adjustment clause revenues, for bills rendered for intrastate service on and after NovemberOctober 1, 20261. The surcredit will be applied on a per Mcf basis, by service class, as indicated in the table below. The surcredit will continue for a period of 15 years without reconciliation. Interest is not applicable to the OPEB balance. The OPEB Temporary Surcredit will be filed with the Commission by October 1 of each year and will be recalculated annually during the 5-year period. (C)

Service Class	Refund Rate Effective 110/1/265	
Sales & SATC		
Residential (RSS & CAP)	($0.23165**1239**)	(I)
Small Comm./Public Authority < 250	($0.1072510550)	(I)
Small Comm./Public Authority > 250	($0.1310211762)	(I)
Large Comm./Public Authority	($0.1090509274)	(I)
Small Volume Industrial Service	($0.0672906196)	(I)
Intermediate Vol. Industrial Service	($0.1506813411)	(I)
MMT & DMT		(D)
Residential	($0.1174610726)	(I)
Small Comm./Public Authority < 250	($0.0813907788)	(I)
Small Comm./Public Authority > 250	($0.1103710683)	(I)
Large Comm./Public Authority	($0.1292311836)	(I D)
Small Volume Industrial Service	($0.0226602116)	(I)
Intermediate Vol. Industrial Service	($0.064090.06070)	(I)
Large Volume Industrial Service	($0.0755707097)	(I)
Large Industrial Service	($0.0471501377)	(I)
		(D)

~~A total of $54,000,000 held in a grantor trust will be used for the passback of funds described above. At the conclusion of the 5-year period, the Company will terminate the grantor trust.~~

~~The Company is suspending regulatory accounting associated OPEB expense because such costs are $0 and base delivery rates have been reduced to eliminate the recovery of OPEB expenses. The $54,000,000 passed back to ratepayers through the one-time bill credit and surcredit mechanisms described above will reduce the regulatory liability due to ratepayers. The remaining regulatory liability balance due to ratepayers will be addressed in the next base rate proceeding.~~

~~Of the regulatory liability balance that is not attributed to ratepayers, the Company will immediately record any portion of the balance attributed to the O&M component of any SFAS 106 income that has accumulated since the last base rate proceeding as a reduction to OPEB expense. The remaining regulatory liability balance not attributed to ratepayers is to be transferred into an account separate from the regulatory liability due to ratepayers and be used to reduce the cost of labor charged to capital projects and affiliates over a period of 5 years. Any remaining portion of the regulatory liability after the expiration of the 5-year period will be addressed in the next base rate proceeding.~~

(C)

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DISTRIBUTION SYSTEM IMPROVEMENT CHARGE (DSIC)

In addition to the net charges provided for in this Tariff, a charge of 0.004.83% will apply consistent with the Commission Order dated December 5, 2024 at Docket No. P-2022-3034957, approving the DSIC. (DI)

1. General Description

A. Purpose: To recover the reasonable and prudent costs incurred to repair, improve, or replace eligible property which is completed and placed in service and recorded in the individual accounts, as noted below, between base rate cases and to provide the Utility with the resources to accelerate the replacement of aging infrastructure, to comply with evolving regulatory requirements and to develop and implement solutions to regional supply problems.

The costs of extending facilities to serve new customers are not recoverable through the DSIC.

B. Eligible Property: The DSIC-eligible property will consist of the following:

- Piping (accounts 365, 367, 374, 376);
- Couplings (account 376);
- Gas services lines (account 380) and insulated and non-insulated fittings (account 378);
- Valves (account 376);
- Excess flow valves (account 376);
- Risers (account 376);
- Meter bars (account 382);
- Meters (account 381);
- Measuring and Regulator Stations (accounts 334,366, 369, 375, 378, 381, 384)
- Industrial and Farm Tap Measuring and Regulating Equipment (account 385)
- Unreimbursed costs related to highway relocation projects where a natural gas distribution company or city natural gas distribution operation must relocate its facilities; and
- Other related capitalized costs (accounts 392, 396, and other misc accounts) (C)

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C. Effective Date: The DSIC will become effective January 1, 2026. (C)

2. Computation of the DSIC

A. Calculation: The initial DSIC, effective January 1, 2025 shall be calculated to recover the fixed costs of eligible plant additions that have not previously been reflected in the Utility's rates or rate base and will have been placed in service between October 1 to November 30, 2024.

NATIONAL FUEL EXHIBIT A

FPFTY

Rebuttal Update

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission

Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)
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NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission

Fully Projected Future Test Period - 12 Months Ended October 31, 2027

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Witness: D. N. Koch
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NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Summary of Rate Base and Revenue Increase

Line #	Description	[1] Function	[2] Reference Section	[3] Pro Forma Test Year Ended October 31, 2027 At Present Rates	[4] Increase	[5] Proposed Rates
RATE BASE						
1	Utility Plant		C-2	$ 957,237		$ 957,237
2	Accumulated Depreciation		C-3	(320,571)		(320,571)
3	Net Plant in service	L 1 + L 2		636,667	-	636,667
4	Working Capital		C-4	6,715		6,715
5	Gas Inventory		C-5	5,664		5,664
6	Accumulated Deferred Income Taxes		C-6	(73,925)		(73,925)
7	Customer Deposits		C-7	(5,166)		(5,166)
8	Materials & Supplies		C-8	1,587		1,587
9	Contribuitions in Aid of Construction and Customer Advances		C-9	(86)		(86)
10	TOTAL RATE BASE	Sum L 3 to L 8		$ 571,456	$ -	$ 571,456
OPERATING REVENUES AND EXPENSES						
	Operating Revenues					
11	Base Customer Charges		D-1 & D-5	$ 139,680	$ 18,475	$ 158,155
12	Gas Cost Revenue		D-5	124,571		124,571
13	Other Operating Revenues		D-5	1,273		1,273
14	Total Revenues	Sum L 10 to L 12		265,524	18,475	283,999
15	Operating Expenses		D-1	(231,839)	(286)	(232,126)
16	OIBIT	L 13 + L 14		33,685	18,189	51,874
17	Pro Forma Income Tax at Present Rates		D-11	2,339		
18	Pro Forma Income Tax on Revenue Increase		D-11		(4,896)	(2,557)
19	NET OPERATING INCOME	Sum L 15 to L 17		$ 36,024	$ 13,292	$ 49,317
20	RATE OF RETURN	L 18 / L 9		6.30%		8.63%
20	RETURN ON EQUITY		B-7	6.87%		10.98%
REVENUE INCREASE REQUIRED						
21	Rate of Return at Present Rates	L 19, Col 3		6.30%		
22	Rate of Return Required		B-7	8.63%		
23	Change in ROR	L 21 - L 20		2.33%		
24	Change in Operating Income	L 22 * L 9		$ 13,293		
25	Gross Revenue Conversion Factor		D-13	1.3899		
26	Change in Revenues	L 23 * L 24		$ 18,475		
27	Percent Increase -- Delivery Revenues	L 25 / L 10, C 3			13.23%	
28	Percent Increase -- Total Revenues	L 25 / L 13, C 3			6.96%	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

SCHEDULE NOT USED

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Statement of Net Utility Operating Income

Line No	Description	[1] FPFTY 10/31/2027	[2] Reference
	Total Operating Revenues		
1	Total Sales Revenues	$ 264,250	B-3
2	Other Operating Revenues	1,273	B-3
3	Total Revenues	265,524	
	Total Operating Expenses		
4	Operation & Maintenance Expenses	79,464	B-4 & D-2
5	Purcashed Gas Costs	124,571	D-5
6	Depreciation & Amortization Expense	25,302	D-2
7	Taxes Other Than Income Taxes	2,489	B-5
8	Total Operating Expenses	231,826	
9	Operating Income Before Income Taxes (OIBIT)	33,698	
	Income Taxes:		
10	State	(330)	B-5
11	Federal	(2,009)	B-5
12	Total Income Taxes	(2,339)	
13	**Net Utility Operating Income**	$ 36,037	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Statement of Operating Revenues

Line No	Description	[1] FPFTY 10/31/2027
	Gas Operating Revenues	
1	Residential (480)	$ 189,133
2	Commercial/Public Authority (481)	30,271
3	Industrial (481)	1,983
4	Transportation (489)	42,862
5	Sub-Total Gas Operating Revenues	264,250
	Other Operating Revenues	
6	Forfeited Discounts (487)	1,125
7	Miscellaneous Service Revenues (488)	-
8	Rent from Gas Properties (493)	100
9	Other Revenues (495)	48
10	Sub-Total Other Operating Revenues	1,273
11	**Total Operating Revenues**	$ 265,524

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Operation and Maintenance Expenses

Line No	Description	Account No	[1] FPFTY 10/31/2027
	Gas Raw Materials		
1	Liquefied Petroleum Gas Expenses	717	$ -
2	Miscellaneous Production Expenses	735	-
3	Total Gas Raw Materials Expenses		-
	Production and Gathering - Operations		
4	Operating Supervision and Engineering	750	0
5	Production Maps and Records	751	-
6	Gas Wells Expenses	752	-
7	Field Lines Expenses	753	20
8	Gas Well Royalties	758	-
9	Other Expenses	759	(0)
10	Total Production & Gathering Operation Expenses		20
	Production and Gathering - Maintenance		
11	Maintenance of Producing Gas Wells	763	-
12	Maintenance of Field Lines	764	0
13	Maintenance of Field Measuring and Reg. Station Equip.	766	-
14	Gas Supply Operation Expenses		0
	Other Gas Supply Expense - Operations		
15	Other Gas Purchases	805.0	-
16	Purchases Gas Cost Adjustments	805.1	-
17	Gas Withdrawn from Storage-Debit	808.1	-
18	Purchased Gas Expenses	807.0	189
19	Gas Used for Other Utility Operations-Credit	812.0	(39)
20	Gas Delivered to Storage-Credit	808.2	-
21	Other Gas Supply Expenses	813.0	-
22	Gas Supply Operation Expenses		150
	Underground Storage Expense - Operation		
23	Operation Supervision and Engineering	814	-
24	Maps and Records	815	-
25	Wells Expenses	816	-
26	Lines Expenses	817	-
27	Measuring and Regulating Station Expenses	820	-
28	Purification Expenses	821	-
29	Gas Losses	823	-
30	Other Expenses	824	-
31	Total Underground Storage Expenses		-
	Underground Storage Expense - Maintenance		
32	Maintenance Supervision and Engineering	830	-
33	Maintenance of Structures and Improvements	831	-
34	Maintenance of Reservoirs and Wells	832	-
35	Maintenance of Lines	833	-
36	Maintenance of Measuring & Regulating Station Equip.	835	-
37	Total Underground Maintenance Expenses		-

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Operation and Maintenance Expenses

Line No	Description	Account No	[1] FPFTY 10/31/2027
	Transmission Expense - Operations		
38	Operating Supervision and Engineering	850	2
39	System Control and Load Dispatching	851	33
40	Communication System Expenses	852	-
41	Mains Expenses	856	662
42	Measuring and Regulating Station Expenses	857	70
43	Other Expenses	859	46
44	Total Transmission Operation Expenses		813
	Transmission Expense - Maintenance		
45	Maintenance Supervision and Engineering	861	0
46	Maintenance of Structures and Improvements	862	15
47	Maintenance of Mains	863	120
48	Maintenance of Measuring and Regulating Station Equip.	865	34
49	Maintenance of Communication Equipment	866	-
50	Maintenance of Other Equipment	867	27
51	Total Transmission Maintenance Expenses		195
	Distribution Expense - Operations		
52	Operation Supervision and Engineering	870	6,426
53	Distribution Load Dispatching	871	873
54	Compressor Station Labor and Expenses	872	32
55	Compressor Station Fuel and Power (Major Only)	873	-
56	Mains and Services Expenses	874	4,421
57	Measuring and Regulating Station Expenses-General	875	367
58	Measuring and Regulating Station Expenses-Industrial	876	118
59	Measuring and Regulating Station Expenses-City Gate	877	9
60	Meter and House Regulator Expenses	878	1,007
61	Customer Installations Expenses	879	1,132
62	Other Expenses	880	5,408
63	Rents	881	122
64	Total Distribution Operation Expenses		19,916
	Distribution Expense - Maintenance		
65	Maintenance Supervision and Engineering	885	837
66	Maintenance of Structures and Improvements	886	931
67	Maintenance of Mains	887	1,266
68	Maintenance of Compressor Station Equipment	888	0
69	Maintenance of Measuring & Reg. Station Equip.-Genl.	889	168
70	Maintenance of Measuring & Reg. Station Equip.-Indtrl.	890	109
71	Maintenance of Measuring & Reg. Station Equip.-City G	891	-
72	Maintenance of Services	892	308
73	Maintenance of Meters & House Regulators	893	484
74	Maintenance of Other Equipment	894	88
75	Construction & Maintenance	895	-
76	Total Distribution Maintenance Expenses		4,191
	Customer Accounts Expense - Operations		
77	Supervision	901	1,530
78	Meter Reading Expenses	902	1,708
79	Customer Records & Collection Expenses	903	8,813
80	Uncollectable Accounts	904	3,121
81	Miscellaneous Customer Accounts Expenses	905	808
82	Total Administrative & General		15,979

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Operation and Maintenance Expenses

Line No	Description	Account No	[1] FPFTY 10/31/2027
	Customer Service & Information Expense		
83	Supervision	907	130
84	Customer Assistance Expenses	908	2,945
85	Informational & Instructional Advertising Expenses	909	777
86	Miscellaneous Customer Service & Informational Exp.	910	740
87	Total Cust. Service & Inform. Operations Exp		4,593
88	Description		
	Sales Expense		
89	Supervision	911	-
90	Demonstrating and Selling Expenses	912	-
91	Advertising Expenses	913	4
92	Miscellaneous Sales Expenses	916	-
93	Total Operation Sales Expenses		4
	Administrative & General - Operations		
94	Administrative and General Salaries	920.0	14,923
95	Office Supplies and Expenses	921.0	3,720
96	Administrative Expenses Transferred-Credit	922.0	(1,597)
96	Outside Service Employed	923.0	757
97	Property Insurance	924.0	113
98	Injuries and Damages	925.0	2,019
99	Employee Pensions and Benefits	926.0	9,248
100	Regulatory Commission Expenses	928.0	2,104
101	General Advertising Expenses	930.1	-
102	Miscellaneous General Expenses	930.2	491
103	Rents	931.0	1,338
104	Total A & G Operation Expenses		33,115
	Administrative & General - Maintenance		
105	A&G Maintenance of General Plant	932	372
106	A&G Maintenance of General Plant	935	-
107	Total A & G Maintenance Expenses		372
108	TOTAL OPERATION & MAINTENANCE EXPENSE		$ 79,348
109	Total Gas Operation Expenses		74,590
110	Total Gas Maintenance Expense		4,758
111	TOTAL OPERATION & MAINTENANCE EXPENSE		$ 79,348

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Detail of Taxes

Line No	Description	Reference	[1] FPFTY 10/31/2027
	Taxes Other Than Income Taxes		
	Non-revenue related:		
1	Pennsylvania - PURTA	D-9	$ 113
2	Capital Stock	D-9	-
3	PA and Local Use taxes	D-9	(23)
4	Subtotal		90
	Payroll Taxes		
5	FICA	D-9	1,953
6	SUTA	D-9	99
7	FUTA	D-9	11
8	Other		-
9	Subtotal		2,062
10	Total Taxes Other Than Income Taxes		$ 2,151
	Income Taxes		
11	State		$ (330)
12	Federal		(2,009)
13	Total Income Taxes		$ (2,339)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Composite Cost of Debt

Line No	Description	[1] Amount Outstanding	[2] Effective Cost Rate	[3] Annualized Cost [1]*[2]	[4] Average Weighted Cost Rate [3]/[1]
Medium Term Notes					
1	4.75% Due 2028	$ 125,000	4.97%	$ 6,213	
2	2.95% Due 2031	50,000	3.06%	1,530	
3	5.949% Due 2033	175,000	6.12%	10,710	
4	5.50% Due 2036	125,000	5.63%	7,038	
5	5.50% Due 2037	275,000	5.63%	15,483	
6	Total Medium-Term Notes	$ 750,000		$ 40,973	5.46%
	Commited Line of Credit			880	
7	Total Long-Term Debt	$ 750,000		$ 41,852	
8	Weighted Cost of Debt				5.58%

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027

Rate of Return

Line No	Description	[1] Capitalization Ratio	[2] Embedded Cost	[3] Statement Reference	[4] Return-%
1	Long-Term Debt	43.60%	5.58%	B-6	2.4300%
2	Short-Term Debt	0.00%	0.00%	B-6	0.00%
3	Common Equity	56.40%	11.00%		6.20%
4	Total	100.00%			8.63%

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Rate Base

Line #	Description	[1] Reference Schedule	[2] # of Pages	[3] Test Year Ended October 31, 2027 At Present Rates	[4] Adjustments	[5] Proposed Rates
Rate Base						
1	Utility Plant	C-2	3	$ 957,237		$ 957,237
2	Accumulated Depreciation	C-3	6	(320,571)		(320,571)
3	Net Plant in service			636,667	-	636,667
4	Working Capital	C-4	5	6,715		6,715
5	Gas Inventory	C-5	1	5,664		5,664
6	Accumulated Deferred Income Taxes	C-6	1	(73,925)		(73,925)
7	Customer Deposits	C-7	1	(5,166)		(5,166)
8	Materials & Supplies	C-8	1	1,587		1,587
9	Contribuitions in Aid of Construction and Customer Advances	C-9	1	(86)		(86)
10	**Total Rate Base**			$ 571,456	$ -	$ 571,456

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Gas Plant in Service Summary

Line #	Description	[1] Reference	[2] FPFTY Additions	[3] FPFTY Retirements	[4] Net Change FPFTY 10/31/27 [2] + [3]
1	Intangible Plant	Sch C-2, Pg 2	$ -	$ -	$ -
2	Production Plant	Sch C-2, Pg 2	458	(81)	377
3	Transmission Plant	Sch C-2, Page 3	17,757	(749)	17,008
4	Distribution Plant	Sch C-2, Page 3	51,247	(3,654)	47,593
5	General Plant	Sch C-2, Page 3	9,986	(2,426)	7,560
6	Non-Depreciable Plant	Sch C-2, Page 3	87	(10)	78
7	Total Utility Plant		$ 79,534	$ (6,919)	$ 72,616

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Year End Plant Balances

Line #	Description	[1] Account Number	[2] Balance September 30, 2026	[3] FPFTY Additions	[4] FPFTY Retirements	[5] Pro Forma October 31, 2027
INTANGIBLE PLANT						
1	Miscellaneous Intangible Plant	303	24,488	-	-	24,488
2	TOTAL INTANGIBLE		24,488	-	-	24,488
PRODUCTION PLANT						
3	Rights of Way	325.4	55	6	(1)	60
4	Field Measuring & Regulating Station Structures	328	11	1	(0)	12
5	Other Structures	329	3	0	(0)	3
6	Field Lines	332	488	54	(10)	533
7	Field Measuring & Reg. Station Equipment	334	3,589	395	(70)	3,914
8	TOTAL PRODUCTION & GATHERING		4,146	458	(81)	4,522

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Year End Plant Balances

Line #	Description	[1] Account Number	[2] Balance September 30, 2026	[3] FPFTY Additions	[4] FPFTY Retirements	[5] Pro Forma October 31, 2027
TRANSMISSION PLANT						
9	Rights of Way	365.2	2,842	543	(23)	3,363
10	Structures & Improvements	366	256	52	(2)	306
11	Mains	367	77,381	15,438	(651)	92,168
12	Measuring & Regulating Station Equipment	369	8,763	1,725	(73)	10,415
13	TOTAL TRANSMISSION		89,243	17,757	(749)	106,251
DISTRIBUTION PLANT						
14	Land & Land Rights	374	16,023	1,150	(82)	17,091
15	Structures & Improvements	375	13,035	944	(67)	13,912
16	Mains	376	402,850	28,872	(2,059)	429,663
17	Measuring & Regulating Station Equipment	378	11,068	801	(57)	11,812
18	Services	380	230,084	16,725	(1,192)	245,617
19	Meters	381	17,737	1,114	(79)	18,771
20	Meter Installations	382	3,531	257	(18)	3,769
21	House Regulatory Installations	384	1,229	87	(6)	1,311
22	Industrial Measuring & Reg. Station Equipment	385	18,802	1,298	(93)	20,008
23	TOTAL DISTRIBUTION		714,361	51,247	(3,654)	761,953.472
GENERAL PLANT						
24	Structures & Improvements	390	1,428	25	(9)	1,444
25	Office Furniture & Equipment	391	8,314	1,675	-	9,989
26	Transportation Equipment	392	15,360	3,081	(1,170)	17,271
27	Tools & Garage Equipment	394	10,297	1,937	(66)	12,168
28	Power Operated Equipment	396	11,426	2,291	(871)	12,847
29	Communication Equipment	397	4,335	977	(309)	5,002
30	TOTAL GENERAL		51,161	9,986	(2,426)	58,721
NONDEPRECIABLE PLANT						
31	Intangible Plant		124	-	-	124
32	Production Plant		3	-	-	3
33	Transmission Plant		20	4	(0)	24
34	Distribution Plant		1,017	72	(5)	1,083
35	General Plant		60	12	(5)	67
						-
36	TOTAL NONDEPRECIABLE PLANT		1,223	87	(10)	$ 1,301
37	Total Plant		$ 884,622	$ 79,534	$ (6,919)	$ 957,237

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF OCTOBER 31, 2027

		DEPRECIABLE GROUP	ORIGINAL COST AS OF OCTOBER 31, 2027	BOOK DEPRECIATION RESERVE
DEPRECIABLE PLANT				
	303	MISCELLANEOUS INTANGIBLE PLANT	24,487,946.38	22,980,541
PRODUCTION PLANT				
	325.4	RIGHTS OF WAY	60,320.48	35,207
	328	MEASURING AND REGULATING STATION STRUCTURES	12,094.97	9,624
	329	OTHER STRUCTURES	3,168.30	1,425
	332	FIELD LINES	532,547.44	174,997
	334	MEASURING AND REGULATING STATION EQUIPMENT	3,914,290.66	1,776,611
TOTAL PRODUCTION PLANT			**4,522,421.85**	**1,997,864.00**
TRANSMISSION PLANT				
	365.2	RIGHTS OF WAY	3,362,805.19	698,575
	366.2	MEASURING AND REGULATING STATION STRUCTURES	298,917.97	121,248
	366.3	OTHER STRUCTURES	6,782.92	3,565
	367.1	MAINS - EXCLUDING CATHODIC PROTECTION	85,799,712.21	20,884,359
	367.2	MAINS - CATHODIC PROTECTION	6,367,938.03	2,404,973
	369	MEASURING AND REGULATING STATION EQUIPMENT		
		1980 AND PRIOR	215,720.24	215,720
		1981 AND SUBSEQUENT	10,199,251.32	4,226,097
		TOTAL ACCOUNT 369	10,414,971.56	4,441,817.00
TOTAL TRANSMISSION PLANT			**106,251,128**	**28,554,537**
DISTRIBUTION PLANT				
	374.2	RIGHTS OF WAY	17,090,714.08	3,404,730
	375.3	STRUCTURES AND IMPROVEMENTS - LARGE	11,458,349.86	6,599,826
	375.4	STRUCTURES AND IMPROVEMENTS - SMALL	2,453,680.05	313,880
	376.1	MAINS - EXCLUDING CATHODIC PROTECTION	426,654,001.60	119,581,152
	376.2	MAINS - CATHODIC PROTECTION	3,009,235.48	1,786,229
	378	MEASURING AND REGULATING STATION EQUIPMENT	11,811,798.18	4,610,360
	380	SERVICES	245,616,638.42	91,471,655
	381	METERS	18,771,077.33	7,079,694
	382	METER INSTALLATIONS	3,769,202.49	1,965,147
	384	HOUSE REGULATOR INSTALLATIONS	1,310,503.47	620,091
	385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	20,008,270.22	7,654,318
TOTAL DISTRIBUTION PLANT			**761,953,471.18**	**245,087,082.00**
GENERAL PLANT				
	390.11	OTHER SMALL STRUCTURES	1,443,596.77	156,669
	391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	389,725.94	150,489
	391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	294,962.33	212,829
	391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	9,304,387.88	5,059,293
	392	TRANSPORTATION EQUIPMENT	17,271,022.03	8,517,958
	394	TOOLS, SHOP AND GARAGE EQUIPMENT	12,168,098.41	2,723,391
	396	POWER OPERATED EQUIPMENT AND TOOLS	12,847,131.23	3,400,852
	397	COMMUNICATION EQUIPMENT	5,002,361.40	1,750,649
TOTAL GENERAL PLANT			**58,721,285.99**	**21,972,130.00**
TOTAL DEPRECIABLE GAS PLANT			**955,936,253.28**	**320,592,154.00**
NONDEPRECIABLE PLANT				
INTANGIBLE PLANT			123,845.54	
PRODUCTION PLANT			2,840.80	
TRANSMISSION PLANT			23,594.83	-256
DISTRIBUTION PLANT			1,083,410.41	4,041
GENERAL PLANT			67,330.91	-25,212
TOTAL NONDEPRECIABLE PLANT			**1,301,022.49**	**-21,427.00**
TOTAL GAS PLANT			**957,237,275.77**	**320,570,727.00**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027

Amortization of Experienced and Estimated Net Salvage

	2023		2024		2025		2026		2027			
ACCOUNT	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	GROSS SALVAGE	COST OF REMOVAL	NET SALVAGE	SALVAGE ACCRUAL
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)*	(13)=(12)/5
334		1,448.50		5,217.60		8,332.68		10,576.24		11,469.09	(37,044.11)	(7,409)
366				1,202.58				444.53		629.33	(2,276.44)	(455)
367.1		5,665.57		57,623.78		121,648.30		175,612.42		248,618.00	(609,168.07)	(121,834)
367.2		979.24		219.03		454.86		1,509.70		2,137.31	(5,300.13)	(1,060)
369.0		8,681.35		6,731.04		10,376.84		40,962.40		57,991.28	(124,742.91)	(24,949)
374	11,154.00	6,697.10	(10,168.60)	12,578.00		2,973.56	546.08	8,600.68	650.50	10,245.35	(38,912.71)	(7,783)
374.2		456.66				1,596.99		66,948.27		79,750.44	(148,752.36)	(29,750)
375.0	50.00	154,258.11		34,621.65		45,560.60	5.50	41,039.56	6.55	48,887.34	(324,305.21)	(64,861)
376	4,016.83	859,668.17	16,961.74	1,694,252.35		1,165,856.83	10,256.46	1,158,075.86	12,217.75	1,379,528.65	(6,213,929.08)	(1,242,786)
376.2		2,271.96		45.12				1,356.42		1,615.80	(5,289.29)	(1,058)
378.0		38,865.63		36,321.76		99,188.50		13,133.20		15,644.59	(203,153.68)	(40,631)
380		274,336.97		359,987.72		523,728.59		189,046.12		225,196.43	(1,572,295.83)	(314,459)
385		10,669.49	0.96	49,516.78		26,736.86	1.35	48,493.97	1.61	57,767.22	(193,180.41)	(38,636)
390		852.37									(852.37)	(170)
TOTAL	**15,220.83**	**1,364,851.12**	**6,794.10**	**2,258,317.41**	**0.00**	**2,006,454.61**	**10,809.38**	**1,755,799.36**	**12,876.41**	**2,139,480.81**	**(9,479,202.60)**	**(1,895,841)**

Current Amortization of Net Salvage Amount included in Depreciation Expense **-1,656,670**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Working Capital

Line No	Description	[1] Fully Projected Future Test Year October 31, 2027	[2] Reference
1	Working Capital for O&M Expenses	$ 7,156	C-4, Page 2
2	Interest Payments	(1,679)	C-4, Page 3
3	Tax Payment Lag Calculations	158	C-4, Page 4
4	Prepaid Expenses	1,080	C-4, Page 5
5	Total Working Capital Requirements	$ 6,715	

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Summary of Working Capital

Line #	Description	[1] Reference	[2] Test Year Expenses	[3] Lead/Lag Days	[4] Weighted Average [2] * [3]	[5] Totals
WORKING CAPITAL REQUIREMENT						
1	REVENUE LAG DAYS	C-4, Page 3-5, HTY				47.16
2	EXPENSE LAG DAYS					
3	Purchased Gas Costs	Schedule A-1	$ 124,571	39.83	$ 4,961,646	
4	Other Expenses (less Uncollectibles and Prepaid Expenses)	Exhibit No. ATF-1 Schedule 1	33,016	41.01	1,353,968	
5	Payroll (Net Labor)	Exhibit No. ATF-1 Schedule 1	40,592	10.32	418,910	
6	Total	Sum (L 3 to L 5)	$ 198,178		$ 6,734,524	
7	O & M Expense Lag Days	L6, Col. 4 / Col. 2				33.98
8	Net (Lead) Lag Days	Line 1 - Line 7				13.18
9	Operating Expenses Per Day	Line 6, Col. 2 / 365				$ 543
10	Working Capital for O & M Expense	Line 8 * Line 9				$ 7,156
11	Interest Payments	Page 3				(1,679)
12	Tax Payment Lag Calculations	Page 4				158
13	Prepaid Expenses	Page 5				1,080
14	Total Working Capital Requirement	Sum (Line 10 to Line 13)				$ 6,715

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Interest Payments

Line No.	Description	[1] Reference Or Factor	[2] # of Days	[3] # of Days	[4] Total
1	Rate Base of October 31, 2027	Sch C-1			$ 571,456
2	Long-term Debt Ratio	Sch B-7			43.60%
3	Embedded Cost of Long-term Debt	Sch B-7			5.58%
4	Pro forma Interest Expense	L 1 * L 2 * L 3			$ 13,903
5	Daily Amount	L 4 / L 5 [Col 2]	365		$ 38
6	Days to mid-point of interest payments			91.25	
7	Less: Revenue Lag Days	Page 2		47.16	
8	Interest Payment lag days	L 7 - L 6			(44.1)
9	Total Interest for Working Capital	L 5 * L 8			$ (1,679)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027

Tax Lag Day Calculations

Line #	Description	[1] Payment Dates	[2] Mid-Point of Service Period	[3] Lead (Lag) Payment Days [1] - [2]	[4] Payment Amount	[5] Weighted Average [3] * [4]	[6] Payment Lead (Lag) Days [5] / [4]	[7] Revenue Lag Days	[8] Net Payment Lead (Lag) Days [6] - [7]	[9] Total Dollar Days	[10] Working Capital Amount 365
	FEDERAL INCOME TAX										
1	4th Quarter Estimate	09/15/26	04/01/26	(167.00)	$ 550	(91,808)					
2	1st Quarter Estimate	01/15/27	04/01/27	76.00	550	41,781					
3	2nd Quarter Estimate	03/15/27	04/01/27	17.00	550	9,346					
4	3rd Quarter Estimate	06/15/27	04/01/27	(75.00)	550	(41,231)					
5	Total				$ 2,199	$ (81,913)	(37.25)	(47.16)	9.91	$ 21,792	$ 60
	STATE INCOME TAX										
6	4th Quarter Estimate	09/15/26	04/01/26	(167.00)	$ 132	(22,086)					
7	1st Quarter Estimate	12/15/26	04/01/27	107.00	$ 132	14,151					
8	2nd Quarter Estimate	03/15/27	04/01/27	17.00	$ 132	2,248					
9	3rd Quarter Estimate	06/15/27	04/01/27	(75.00)	$ 132	(9,919)					
10	Total				$ 529	(15,606)	(29.50)	(47.16)	17.66	$ 9,342	$ 26
	PA PROPERTY TAX										
11	First Payment	03/11/27	12/30/27	294.00	21	6,145					
12	Second Payment	04/05/27	12/30/27	269.00	21	5,622					
13	Third Payment	08/03/27	12/30/27	149.00	21	3,114					
14	Fourth Payment	09/08/27	12/30/27	113.00	21	2,362					
16	Total				$ 84	17,243	206.25	(47.16)	253.41	$ 21,185	$ 58
	PURTA										
17	CY 2026 Purta Tax	10/15/26	07/02/26	(105.00)	9	(984)					
18	CY 2026 Purta Tax	11/15/26	07/02/26	(136.00)	9	(1,275)					
19	CY 2026 Purta Tax	12/15/26	07/02/26	(166.00)	9	(1,556)					
20	CY 2027 Purta Tax	01/15/27	07/02/27	168.00	9	1,575					
21	CY 2027 Purta Tax	02/15/27	07/02/27	137.00	9	1,284					
22	CY 2027 Purta Tax	03/15/27	07/02/27	109.00	9	1,022					
23	CY 2027 Purta Tax	04/15/27	07/02/27	78.00	9	731					
24	CY 2027 Purta Tax	05/15/27	07/02/27	48.00	9	450					
25	CY 2027 Purta Tax	06/15/27	07/02/27	17.00	9	159					
26	CY 2027 Purta Tax	07/15/27	07/02/27	(13.00)	9	(122)					
27	CY 2027 Purta Tax	08/15/27	07/02/27	(44.00)	9	(413)					
28	CY 2027 Purta Tax	09/15/27	07/02/27	(75.00)	9	(703)					
					$ 113	169	1.50	(47.16)	48.66	$ 5,474	$ 15
29	Total Working Capital For Other Taxes										$ 158

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027

Prepaid Expenses

Line #	Description	[1]	[2] TOTAL	[3] Insurance WP-09	[4] PUC Assessment WP-09	[5] AGA Dues WP-09	[6] IT Services WP-09
1	September 2026		1,597	680	834	(0)	84
2	October		1,479	572	812	23	73
3	November		1,264	476	714	12	62
4	December		1,048	378	618	(0)	52
5	January 2027		834	285	520	(13)	41
6	February		653	185	423	13	32
7	March		428	81	325	(0)	21
8	April		264	-	228	25	11
9	May		1,316	1,173	130	13	-
10	June		1,236	1,087	33	(0)	115
11	July		1,018	982	(65)	(13)	113
12	August		777	862	(162)	(25)	103
13	September		1,731	750	891	(0)	91
14	October 2027		1,479	572	812	23	73
15	TOTAL		$ 15,124	$ 8,082	$ 6,114	$ 57	$ 871
16	Percent to Gas			100.00%	100.00%	100.00%	100.00%
17	Amount to Gas			$ 8,082	$ 6,114	$ 57	$ 871
18	Monthly Average	14		$ 577	$ 437	$ 4	$ 62
19	Rate Case Amount		$ 1,080				

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Gas Inventory

Line No.	Description	[1] Stored Underground
1	October, 2026	$ 15,744
2	November	9,900
3	December	5,626
4	January, 2027	3,663
5	February	2,496
6	March	1,873
7	April	2,155
8	May	2,940
9	June	3,824
10	July	4,591
11	August	5,343
12	September	9,814
13	October, 2027	15,744
14		
15	Total	$ 83,714
16	12 month Modified Average Balance	$ 5,664

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Accumulated Deferred Income Taxes

Line #	Description		[1] Amount	[2] Total
	Accumulated Deferred Income Tax			
1	Gas Utility Plant - a/c #282	Exhibit EF-1	$ (73,222)	
2	Federal ADIT			(73,222)
3	Pro-Rata Adjustment		$ (703)	(703)
4	**Balance At October 31, 2027**	Exhibit EF-1		$ (73,925)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Customer Deposits

Line #	Description	[1] Balance At End Of Month
1	September, 2026	$ 5,144
2	October	$ 5,178
3	November	$ 5,321
4	December	$ 5,194
5	January, 2027	$ 5,170
6	February	$ 5,135
7	March	$ 5,114
8	April	$ 5,135
9	May	$ 5,166
10	June	$ 5,156
11	July	$ 5,133
12	August	$ 5,137
13	September	$ 5,144
14	October, 2027	$ 5,178
15	Total	$ 67,163
16	Number of Months	13
17	Average Monthly Balance	$ 5,166

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Materials & Supplies

Line #	Month	[1] Balance At End Of Month
1	September, 2026	$ 1,668
2	October	1,608
3	November	1,697
4	December	1,509
5	January, 2027	1,523
6	February	1,410
7	March	1,491
8	April	1,506
9	May	1,586
10	June	1,639
11	July	1,705
12	August	1,677
13	September	1,668
14	October, 2027	1,608
15	Total	$ 20,625
16	Number of Months	13
17	Average Monthly Balance	$ 1,587

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

	Contributions in Aid of Construction		Customer Advances	
Line #	Month	[1] Balance At End Of Month	Month	[1] Balance At End Of Month
1	September, 2026	$ -	September, 2026	$ (68)
2	October	(1)	October	(61)
3	November	(178)	November	(61)
4	December	(24)	December	(61)
5	January, 2027	(22)	January, 2027	(61)
6	February	(5)	February	(61)
7	March	(9)	March	(60)
8	April	-	April	(60)
9	May	(17)	May	(60)
10	June	(15)	June	(60)
11	July	(22)	July	(60)
12	August	-	August	(60)
13	September	(6)	September	(60)
14	October, 2027	(24)	October, 2027	(60)
15	Total	$ (323)	Total	$ (789)
16	Number of Months	13	Number of Months	13
17	Average Monthly Balance	$ (25)	Average Monthly Balance	$ (61)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Summary of Revenue and Expenses
Pro Forma with Proposed Revenue Increase

Line #	Description	Factor Or Reference	[1] Pro Forma Test Year At Present Rates	[2] Pro Forma Test Year Rate Increase	[3] Pro Forma Test Year At Proposed Rates
	OPERATING REVENUES				
1	Customer & Distribution Revenue		$ 139,680	$ -	$ 139,680
2	Gas Supply & Cost Adjustment Revenue		124,571	-	124,571
3	Other Revenues		1,273	-	1,273
4	Revenue Increase			18,475	18,475
5	Total Operating Revenues		265,524	18,475	283,999
	OPERATING EXPENSES				
6	Manufactured Gas		29	-	29
7	Gas Supply Production		67,501	-	67,501
8	Transmission		58,233		58,233
9	Distribution		24,107	-	24,107
10	Customer Accounts		12,859	-	12,859
11	Uncollectible Expense	1.55%	3,121	286	3,407
12	Customer Information & Services		4,593	-	4,593
13	Sales		4	-	4
14	Administrative & General		33,603	-	33,603
15	Depreciation & Amortization		25,302	-	25,302
16	Taxes other than income taxes		2,489	-	2,489
17	Total Operating Expenses		231,839	286	232,126
18	Net operating income Before Income Tax		33,684	18,189	51,873
	Income Taxes				
19	Pro Forma Income Tax At Present Rates		(2,339)		(2,339)
20	Pro Forma Income Tax on Revenue Increase			4,896	4,896
21	Net Income (loss)		$ 36,024	$ 13,292	$ 49,316

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Summary of Pro Forma Revenue and Expense
Adjustments with Proposed Revenue Increase

Line #	Description	[1] Factor Or Reference	[2] Test Year At Present Rates FPFTY 10/31/27	[3] Adjustments Sch D-3 Increase (Decrease)	[4] Pro Forma Adjusted For Test Year 10/31/27	[5] Proposed Increase	[6] Pro Forma Test Year With Proposed Increase
	OPERATING REVENUES			-	[2] + [3]		[4] + [5]
1	Residential	480	$ 189,133	$ -	$ 189,133		$ 189,133
2	Comm/PA	481	30,271	-	30,271		30,271
3	Industrical	481	1,983	-	1,983		1,983
4	Transportation	489	42,862	-	42,862		42,862
5	Forfeited Discounts		1,125	-	1,125		1,125
6	Miscellaneous Service Revenues		48	-	48		48
7	Rent from Gas Properties		100	-	100		100
8	Rate Increase			-	-	18,475	18,475
9	Total Operating Revenues		265,524	-	265,524	18,475	283,999
	OPERATING EXPENSES						
10	Gas Production		29	-	29		29
11	Gas Supply Production		67,501	-	67,501		67,501
12	Transmission		58,233		58,233		58,233
13	Distribution		24,107	-	24,107		24,107
14	Customer Accounts		12,859	-	12,859		12,859
15	Uncollectible Expense	1.55%	3,121	-	3,121	286	3,407
16	Customer Information & Services		4,593	-	4,593		4,593
17	Sales		4	-	4		4
18	Administrative & General		33,487	116	33,603		33,603
19	Depreciation & Amortization		23,406	1,896	25,302		25,302
20	Taxes other than income taxes		2,151	338	2,489		2,489
21	Total Operating Expenses		229,490	2,350	231,839	286	232,126
22	Net Operating Income - BIT		$ 36,034	$ (2,350)	$ 33,684	$ 18,189	$ 51,873

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Summary of Pro Forma Adjustments

Line #	Description		[1] As Budgeted And Allocated	[2] Adjustments Reserved	[3] Adjustments Reserved	[4] Adjustments Reserved	[5] Adjustments Rate Case D-6	[6] Adjustments Regulatory Amortizations D-14	[7] Adjustments Sub-Total Adjustments	[8] Total Pro Forma
	OPERATING REVENUES									
	Customer & Distribution Revenue									
1	Residential	480	$ 89,078						$ -	$ 89,078
2	Comm/PA	481	12,261						-	12,261
3	Industrical	481	697						-	697
4	Transportation	489	37,643						-	37,643
	Revenue for Cost of Gas								-	-
5	Residential	480	100,055						-	100,055
6	Comm/PA	481	18,011						-	18,011
7	Industrical	489	1,286						-	1,286
8	Transportation	489	5,219						-	5,219
9	Forfeited Discounts		1,125						-	1,125
10	Miscellaneous Service Revenues		48							48
10	Rent from Gas Properties		100						-	100
11			-						-	-
12	Total Operating Revenues		265,524	-	-	-	-	-	-	265,524
	OPERATING EXPENSES									-
13	Gas Production		29						-	29
14	Gas Supply Production		67,501						-	67,501
15	Transmission		58,233							58,233
16	Distribution		24,107						-	24,107
17	Customer Accounts		12,859						-	12,859
18	Uncollectible Expense		3,121						-	3,121
19	Customer Information & Services		4,593						-	4,593
20	Sales		4						-	4
21	Administrative & General		33,487				344	-228	116	33,603
22	Depreciation & Amortization		23,406						-	23,406
23	Taxes other than income taxes		2,151						-	2,151
									-	-
24	Total Operating Expenses		$ 229,490	$ -	$ -	$ -	$ 344	$ (228)	$ 116	$ 229,606
25	Net operating income Before Income Tax		$ 36,034	$ -	$ -	$ -	$ (344)	$ 228	$ (116)	$ 35,918

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Summary of Pro Forma Adjustments

Line #	Description	[1] From Page 1 Sub-total	[2] Adjustments Reserved	[3] Reserved	[4] Reserved	[5] Depreciation D-8	[6] Taxes Other Than Income D-9	[7] TOTAL Adjusted
	OPERATING REVENUES							
26	**Customer & Distribution Revenue**							
27	Residential	$ 89,078						$ 89,078
28	Comm/PA	12,261						12,261
29	Industrical	697						697
30	Transportation	37,643						37,643
	Revenue for Cost of Gas							
31	Residential	100,055						100,055
32	Comm/PA	18,011						18,011
33	Industrical	1,286						1,286
34	Transportation	5,219						5,219
35	Forfeited Discounts	1,125						1,125
36	Miscellaneous Service Revenues	48						48
37	Rent from Gas Properties	100						100
38	-	-						-
39	Total Operating Revenues	265,524	-	-	-	-	-	265,524
	OPERATING EXPENSES							
40	Gas Production	29						29
41	Gas Supply Production	67,501						67,501
42	Transmission	58,233						58,233
43	Distribution	24,107						24,107
44	Customer Accounts	12,859						12,859
45	Uncollectible Expense	3,121						3,121
46	Customer Information & Services	4,593						4,593
47	Sales	4						4
48	Administrative & General	33,603						33,603
49	Depreciation & Amortization	23,406				1,896		25,302
50	Taxes other than income taxes	2,151					338	2,489
51	Total Operating Expenses	$ 229,606	$ -	$ -	$ -	$ 1,896	$ 338	$ 231,839
52	Net operating income Before Income Tax	$ 35,918	$ -	$ -	$ -	$ (1,896)	$ (338)	$ 33,684

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

SCHEDULE NOT USED

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Adjustment - Revenue Summary

Line #	Description	[1] Reference Or Account Number	[2] FPFTY 10/31/27	[4] Other Adjustments	[5] Total Proforma Adjustments	[6] Proforma Adjusted At Present Rates
	Customer & Distribution Revenue					
1	Residential	480	89,078		$ -	$ 89,078
2	Comm/PA	481	12,261		-	12,261
3	Industrical	481	697		-	697
4	Transportation	489	37,643		-	37,643
5	Cust Chg & Distrib Revenue		139,680	-	-	139,680
	Revenue for Cost of Gas					
6	Residential	480	100,055		-	100,055
7	Comm/PA	481	18,011		-	18,011
8	Industrical	481	1,286		-	1,286
9	Transportation	489	5,219		-	5,219
10	Revenue for Cost of Gas		124,571	-	-	124,571
						-
11	Total Customer Revenue		264,250	-	-	264,250
12	Forfeited Discounts	487	1,125			1,125
13	Miscellaneous Service Revenues	488	-			-
						-
14	Rent from Gas Properties	493	100			100
15	Other Revenues	495	48		-	48
16	TOTAL REVENUES		$ 265,524	$ -	$ -	$ 265,524

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Adjustment - Rate Case Expense

Line #	Description	[1] Reference	[2] Amount	[3] Total
	Rate Case Expenditures			
1	External Consultants			382
2	External Legal			480
3	Advertising/Miscellaneous Costs			170
4	Sub-Total	L 1 to L 3		1,032
	Total Expenditures for Rate Case Filing			
5	TOTAL COSTS	L 4		$ 1,032
6	Normalized over 3 year (Line 5 / 6)		3	$ 344
7	Pro Forma Adjustment	L6, [C3]		$ 344

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Adjustment - Uncollectibles

Line #	Description	[1] Reference Or Factor	[2] Adj Net Write-Offs	[3] Adj Gross Revenue	[4] Percent [2] / [3]	[5] Total [2] / [3]
Adjustment #1:						
1	12 Months ended September 2022		$ 2,851	$ 199,458	1.43%	
2	12 Months ended September 2023		$ 3,340	$ 216,182	1.55%	
3	12 Months ended September 2024		$ 4,312	$ 270,623	1.59%	
4	Three Year Average	3	$ 3,501	$ 228,754		1.53%
	Sum (Line 1 to Line 3) / 3					
	Management Adj.					0.02%
	Uncollectible Factor					1.55%
5	Forecasted Revenue					$ 265,524
6	Forecasted Uncollectible Expense					$ 4,117
Adjustment #2:						
7	CAP Arrearages - Recovered in RIDER F			(749)		
8	Pro Forma Adjustment					$ (749)
9	Total Uncollectible Adjustment	L6 + L8				$ 3,367

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Adjustment - Depreciation expense

Line #	Description	[1] Account Number	[2] 10/31/27 Depreciation Expense	[3] Adjustment To Annualize At New Depre Study Rates	[4] Pro Forma Test Year Depreciation
INTANGIBLE PLANT					
1	Miscellaneous Intangible Plant	303	350	-	350
2	TOTAL INTANGIBLE		350	-	350
PRODUCTION PLANT					
3	Rights of Way	325.4	0.6	-	1
4	Field Measuring & Regulating Station Structures	328	0	-	0
5	Other Structures	329	0	-	0
6	Field Lines	332	14	-	14
7	Field Measuring & Reg. Station Equipment	334	132		132
			-	-	-
8	TOTAL PRODUCTION & GATHERING		146	-	146

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Adjustment - Depreciation expense

Line #	Description	[1] Account Number	[2] 10/31/27 Depreciation Expense	[3] Adjustment To Annualize At New Depre Study Rates	[4] Pro Forma Test Year Depreciation
TRANSMISSION PLANT					
9	Rights of Way	365.2	43		43
10	Structures & Improvements	366	6		6
11	Mains	367	1,673		1,673
12	Measuring & Regulating Station Equipment	369	182		182
13	TOTAL TRANSMISSION		1,904	-	1,904
DISTRIBUTION PLANT					
14	Land & Land Rights	374	225	-	225
15	Structures & Improvements	375	418		418
16	Mains	376	7,629		7,629
17	Measuring & Regulating Station Equipment	378	344		344
18	Services	380	5,247		5,247
19	Meters	381	549		549
20	Meter Installations	382	65		65
21	House Regulatory Installations	384	24		24
22	Industrial Measuring & Reg. Station Equipment	385	372		372
23	Other Property	386	-		-
24	TOTAL DISTRIBUTION		14,872	-	14,872
GENERAL PLANT					
25	Structures & Improvements	390	60		60
26	Office Furniture & Equipment	391	1,611		1,611
27	Transportation Equipment	392	2,180		2,180
28	Tools & Garage Equipment	394	488		488
29	Power Operated Equipment	396	1,304		1,304
30	Communication Equipment	397	491		491
31	Other Tangible Property	399	-	-	-
32	TOTAL GENERAL		6,134	-	6,134
33	TOTAL DEPRECIATION		$ 23,406	$ -	$ 23,406
34	CHARGED TO CLEARING ACCOUNTS		$ (3,484)	$ -	$ (3,484)
35	NET SALVAGE AMORTIZATION	Schedule C-3	$ 1,657	$ 239	$ 1,896

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Adjustment - Taxes Other Than Income Taxes

Line #	Description	[1] Account Number	[2] Factor or Reference	[3] FPFTY Amounts 10/31/27	[4] Pro Forma Adjustments	[5] Pro Forma Tax Expense 10/31/27
1	PURTA Taxes	408.1		$ 113	$ -	$ 113
2	Capital Stock	408.1		-		-
3	PA & Local Use taxes	408.1		(23)	-	(23)
4	Social Security	408.1	D-10	1,953	318	2,271
5	FUTA	408.1	D-10	11	1	12
6	SUTA	408.1	D-10	99	18	117
7	Total			$ 2,151	$ 338	$ 2,489

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Adjustment - Payroll Taxes

Line #	Description	[1] Account Number	[2] Test Year 9/30/25 Present Rates	[3] 10/31/27 Pro Forma Adjustments	[4] Increase in Payroll Taxes
1	Total Payroll Charged to Expense		$ 34,569	$ 40,194	
2	FICA Expense		1,953	2,271	318
3	FICA Expense - Percent	L 2 / L 1	5.65%	5.65%	
4	Pro Forma FICA Expense on Projected Payroll				$ 318
5	FUTA Expense		11	12	1
6	FUTA Expense - Percent	L 5 / L 1	0.03%	0.03%	
7	Pro Forma FUTA Expense on Projected Payroll				$ 1
8	SUTA Expense		99	117	18
9	SUTA Expense - Percent	L 8 / L 1	0.29%	0.29%	
10	Pro Forma SUTA Expense on Projected Payroll				$ 18
11	Pro Forma Adjustment	Sum L 4 to L 10			$ 338

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Income Tax Calculation

Line #	Description	[1] Factor Or Reference	[2] Element Or Amount	[3] Pro Forma Test Year At Present Rates	[4] Revenue Increase	[5] Pro Forma Test Year At Proposed Rates [3] + [4]
1	Revenue	Sch D-2		$ 265,524	$ 18,475	$ 283,999
2	Operating Expenses	Sch D-2		(231,839)	(286)	(232,126)
3	OIBIT	L1 + L2		33,684	18,189	51,873
	Interest Expense					
4	Rate Base	Sch A-1	571,456			
5	Weighted Cost of Debt	Sch B-7	0.02430			
6	Synchronized Interest Expense	L4 * L5		(13,886)	-	(13,886)
7	Base Taxable Income	L3 + L6		19,798	18,189	37,987
8	Total State Tax Depreciation	Sch D-12	$ 21,096			
9	Pro Forma Book Depreciation	Sch D-12	25,302			
10	State Tax Depreciation (Over) Under Book	L8 + L9		4,206		4,206
11	Other	EF-2		(36,109)	-	(36,109)
12	State Taxable Income/(Loss)	Sum L7 to L11		$ (12,105)	$ 18,189	$ 6,084
13	State Income Tax (Expense)/Benefit	-L12 * Rate State	7.49%	$ 907	$ (1,362)	$ (456)
13A	State Income Tax Benefit Adjustment (NOL not utilized)			(907)		
13B	Net State Income Tax	L13 Col (5)		$ -		$ (456)
14	Total Federal Tax Depreciation	Sch D-12	$ 17,163			
15	Pro Forma Book Depreciation	Sch D-12	25,302			
16	Federal Tax Deducts (Over) Under Book	L15 - L14		8,139	-	8,139
17	Other	EF-2		(36,109)	-	(36,109)
18	Federal Taxable Income/(Loss)	L7 + Sum L13 to L17		(8,172)	16,826	9,561
19	Federal Income Tax (Expense)/Benefit	-L18 * Rate Fed	21.00%	1,716	(3,534)	(2,008)
20	Total Current Income Tax (Expense)/Benefit	L13 + L19		1,716	(4,896)	(2,463)
	Deferred Federal Income Taxes					
21	Federal Tax Deducts (Over) Under Book	L16	$ 8,139			
22	Adjust for Book Flow Through Depreciation	EF-2	7,938			
23	Net Temporary Difference Depreciation	L22 - L21		(201)		(201)
24	Other Deferred Adjustments	EF-2		(1,500)		(1,500)
25	Federal Temporary Differences	L23 + L24		(1,701)	-	(1,701)
						-
26	Deferred Federal Taxable Income/(Loss)	L25		$ (1,701)	$ -	$ (1,701)
27	Deferred Federal Income Tax (Expense)/Benefit	-L26 * Rate Fed	21.00%	357	-	357
	Deferred State Income Taxes					
28	PA 2009 Repairs Section 481(a) Amortization	Stmt No. 12		330		330
						-
29	State Deferred Income Tax (Expense)/Benefit			330	-	330
30	Net Income Tax (Expense)/Benefit	L20 + L27 + L29		2,403	(4,896)	(1,776)
	Other Tax Adjustments					
31	PA 2009 Repairs Section 481(a) Amortization - Federal Benefit	Stmt No.12		(69)		(69)
32	Medicare Subsidy Amortization	EF-3		-		-
33	ARAM	Stmt No.12		950		950
34	Unprotected	Stmt No.12		(945)		(945)
35	Combined Income Tax (Expense)/Benefit	Sum L30 to L34		$ 2,339	$ (4,896)	$ (1,840)
36	Federal Income Tax (Expense)/Benefit	L 19 + L27 + Sum L31 to L34		$ 2,009	$ (3,534)	$ (1,715)
37	State Income Tax (Expense)/Benefit	L13 + L29		330	(1,362)	(126)
38	Total Income Tax (Expense)/Benefit	L36 + L37		$ 2,339	$ (4,896)	$ (1,840)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Tax Depreciation

Line #	Description	[1] Amount	[2] Amount	[3] Total
	Accelerated Tax Depreciation			
1	Gas Plant		$ 15,267	
2	Net Salvage Amortization		1,896	
3	Total Federal Accelerated Tax Depreciation			$ 17,163
4	Adjustment for PA Tax Depreciation		3,933	
5	Total State Accelerated Tax Depreciation			$21,096
	Book Depreciation			
6	Pro Forma Book Depreciation		$ 23,406	
7	Net Salvage Amortization		1,896	
8	Book Depreciation for Tax Calculation			$ 25,302

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Gross Revenue Conversion Factor

Line #	Description	[1] Reference Or Factor	[2] Tax Rate	[3] Factor
GROSS REVENUE CONVERSION FACTOR				
1	GROSS REVENUE FACTOR			1.000000
2	UNCOLLECTIBLE EXPENSES	D-7		(0.015505)
3	NET REVENUES	Sum L 1 to L 2		0.984495
4	STATE INCOME TAXES	[3] L 3 * Rate [2]	7.4900%	(0.073739)
5	FACTOR AFTER STATE TAXES	L 3 + L 4		0.910756
6	FEDERAL INCOME TAXES	[3] L 5 * Rate [2]	21.00%	(0.191259)
7	NET OPERATING INCOME FACTOR	L 5 + L 6		0.719497
8	GROSS REVENUE CONVERSION FACTOR	1 / L 7		1.38986
9	Combined Income Tax Factor On Gross Revenues	-L 4 - L 6		26.500%
INCOME TAX FACTOR				
10	GROSS REVENUE FACTOR			1.000000
11	STATE INCOME TAXES	[3] L 10 * Rate [2]	7.4900%	(0.074900)
12	FACTOR AFTER STATE TAXES	L 10 + L 11		0.925100
13	FEDERAL INCOME TAXES	[3] L 12 * Rate [2]	21.00%	(0.194271)
14	NET OPERATING INCOME FACTOR	L 12 + L 13		0.730829
15	GROSS REVENUE CONVERSION FACTOR	1 / L 14		1.368309
16	Combined Income Tax Factor On Taxable Income	-L 11 - L 13		26.917%

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Regulatory Amortizations

Line #	Description	[1] Reference	[2] Amount	[3] Total
	Regulatory Asset			
1	Medicare Subsidy	Statement No. 12		$ (925)
2	TCJA Over/Under Balance	Statement No. 2		$ 242
3	TOTAL COSTS	L1 + L2		$ (683)
4	Normalized over 3 year (Line 3 / 3)		3	$ (228)
4	Pro Forma Adjustment	L3		$ (228)

NATIONAL FUEL STATEMENT NO. 1

REBECCA E. HILLERY

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 1

Direct Testimony of
Rebecca E. Hillery

Topics Addressed:
Rate Filing Overview
Key Drivers of Rate Relief
Other Key Proposals
Management Effectiveness and Performance
Introduction of Witnesses

Dated: January 28, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Rebecca E. Hillery. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. By whom and in what capacity are you employed?

A. I am employed by National Fuel Gas Distribution Corporation ("NFGDC") as the Managing Director of Rates and Regulatory Affairs.

Q. Please briefly describe your responsibilities in that capacity.

A. As Managing Director, I am responsible for managing all aspects of the Rates and Regulatory Affairs department. This includes sales and revenue forecasting, tariff administration and compliance, Pennsylvania Section 1307(f) purchased gas cost filings, base rate case filings, and a broad range of regulatory reporting and compliance activities for NFGDC's Pennsylvania ("National Fuel" or "Company") and New York ("National Fuel – NY") divisions.

Q. Please provide your educational background.

A. I received a Bachelor of Science in Business Administration from the State University of New York at Buffalo in May 2004 with a concentration in Accounting.

Q. Please provide your professional experience.

A. I began my professional career with Ernst & Young, LLP in McLean, VA in September 2004 as an Assurance Associate. I joined NFGDC in June 2006 as a Financial Auditor in the Audit Services department. I advanced within Audit Services over the course of nine years to Manager of Financial Audits. I then transferred internally within National Fuel to an unregulated subsidiary where I served as Accounting and Risk Manager from April 2015 through August 2019. In August 2019, I transferred back to NFGDC where I served as Chief Auditor for National Fuel Gas Company and all its subsidiaries until September 2025 when I became the Managing Director of the Rates and Regulatory Affairs department. I have been a Certified Public Accountant in New York State since 2007.

Q. Have you previously testified in other proceedings before the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission") or any other state or federal agency?

A. I have not previously testified in any proceedings before the PAPUC or any other state or federal agency.

Q. Please provide a brief overview of NFGDC's utility business operations.

A. NFGDC owns and operates local natural gas distribution systems serving approximately 214,000 customers and 543,000 customers in its northwest Pennsylvania and western New York service territories, respectively. National Fuel maintains headquarters and a customer service call center in Erie, Pennsylvania, and operates approximately 4,900

miles of main and transmission natural gas pipelines and 13 service centers across northwest Pennsylvania. For the fiscal year ended September 30, 2025, the Company's total normalized throughput was approximately 45.5 billion cubic feet (Bcf), with residential, commercial & public authority, and industrial customer classes making up 41%, 21% and 38%, respectively, of the annual load. Nearly all its 195,000 residential customers use natural gas for space heating purposes.

Q. Discuss NFGDC's relationship with its parent, National Fuel Gas Company, and affiliated subsidiaries.

A. NFGDC is a wholly owned subsidiary of National Fuel Gas Company ("NFG"). NFG is a publicly traded holding company headquartered in Williamsville, New York, that owns and operates businesses across the natural gas value chain from the well-head to the customer's burner tip. The following is a summary of each affiliated company owned by NFG and a brief description of their relationship with National Fuel.

- National Fuel Gas Supply Corporation ("NFG Supply") and Empire Pipeline, Inc. ("Empire") own and operate interstate natural gas pipeline and storage assets in Pennsylvania and New York that are regulated by the Federal Energy Regulatory Commission ("FERC"). National Fuel is a customer of NFG Supply and Empire, contracting for firm transportation and storage services that deliver Appalachian natural gas supplies at direct interconnects with the Company's system.
- National Fuel Gas Midstream Company, LLC ("NFG Midstream") builds and operates natural gas gathering and processing assets for Seneca and third-party

Appalachian producers in Pennsylvania. National Fuel does not have a customer relationship with NFG Midstream.

- Seneca Resources Company, LLC ("Seneca") holds the rights to 1.2 million net acres in Pennsylvania, where it develops and produces approximately 1.2 billion cubic feet per day of natural gas in Appalachia. National Fuel does not contract with Seneca to purchase any of its gas production.

Q. Have there been any changes to NFGDC's service territory since the last rate case?

A. There have not been any material changes to NFGDC's service territory since the last rate case. NFGDC filed a Joint Application with North East Heat & Light Company ("NEHL") on October 7, 2025 (Docket No. A-2025-3057864) requesting approval for NFGDC to acquire certain natural gas distribution facilities and rights from NEHL in the Borough of North East, Erie County, Pennsylvania and North East Township, Erie County, Pennsylvania. The Joint Application remains pending before the Commission.

Q. Please describe the Joint Application with NEHL and its impact on this proceeding.

A. As described further in the Joint Application, the proposed transaction will be carried out pursuant to an Asset Purchase Agreement. The proposed transaction, if approved, is anticipated to close during the Future Test Year ("FTY"). The Company will not be recovering any acquisition premium related to the proposed transaction and is not seeking rate recovery for any of the transactional or transitional costs. Furthermore, while NFGDC intends to move NEHL customers to the Company's Commission-approved tariff (Tariff – Gas – Pa.P.U.C No. 9) ("Tariff"), the Company has proposed to add a

temporary tariff Rate Schedule for former NEHL customers for delivery rate purposes as further described in the Joint Application. The Company has not included any costs related to NEHL in this proceeding and is not seeking to change NEHL's current delivery rates in this rate proceeding.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your testimony.

A. My testimony addresses several items. First, I present an overview of the rate filing, including a summary of why the Company is seeking rate relief, a review of customer bill impacts, and an explanation for why the Company's proposed rate increase is just and reasonable. Second, I present in further detail the key drivers of the Company's need for rate relief at this time. Third, I provide an overview of certain key proposals that will be discussed in the case. Next, I discuss and present evidence of National Fuel's outstanding management performance and propose how it should be recognized in this case. Finally, I introduce the witnesses who are providing direct testimony on behalf of the Company in this rate filing.

Q. Are you sponsoring any exhibits or filing requirements in this proceeding?

A. No.

III. OVERVIEW OF RATE FILING

Q. Please summarize the relief that National Fuel is requesting through this rate filing.

A. National Fuel is seeking an increase in its annual base delivery revenues of $19.7 million, or 7.4% on a total revenue basis. The base rate increase requested in this filing utilizes a

fully projected future test year ending October 31, 2027 ("FPFTY"). The Company is also proposing, among other things, to make permanent the Weather Normalization Adjustment ("WNA") mechanism that was successfully implemented as a pilot program following the last rate case to protect ratepayers and the Company from volatility in weather, and a new energy efficiency pilot program to benefit customers that would recover an additional $0.7 million from residential customers annually in a separate rider.

Q. When was the last time National Fuel sought a base rate increase?

A. National Fuel's last base rate filing was in 2022, with new rates effective August 1, 2023.

Q. Is National Fuel choosing to voluntarily comply with the order associated with Docket L-2012-2317273 with regard to rate case data filing requirements?

A. Yes. Docket L-2012-2317273 establishes filing requirements, data standards, and evaluation procedures for utilities that choose to base general rate increase requests on a FPFTY. Utilities have until May 30, 2026 to comply with this order, however National Fuel has chosen to voluntarily comply in conjunction with this rate filing.

Q. Why is National Fuel seeking a rate increase at this time?

A. For many years, National Fuel has successfully operated a safe and reliable system, provided high-quality customer service, and earned a reasonable rate of return. In recent years, the Company has experienced the effects of significant cost inflation that is driving continued increases in labor expenses and other operating costs. Additionally, the Company is continuing to accelerate its infrastructure replacement and system

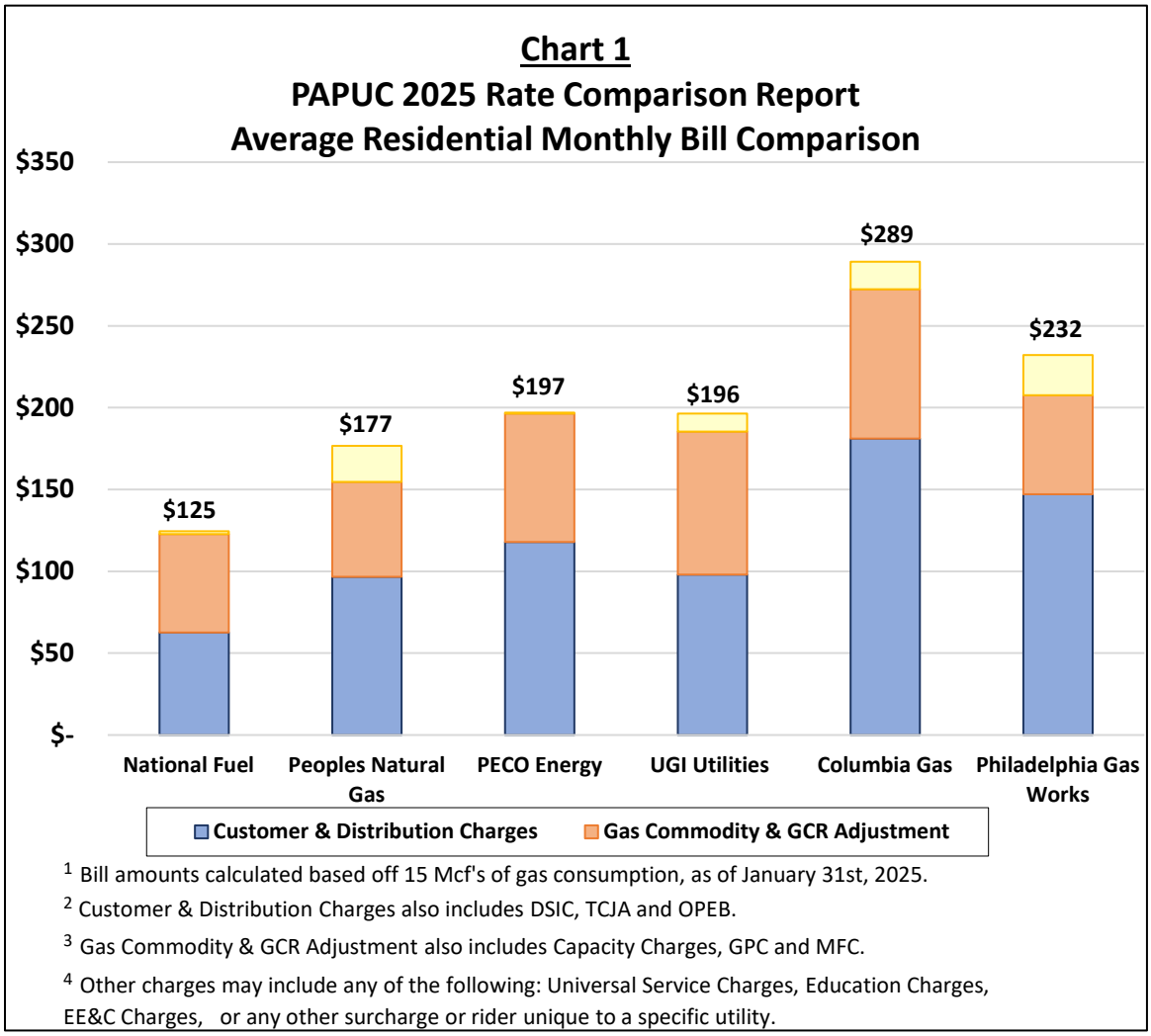
modernization investments to enhance safety and reliability and reduce emissions. As a result of these cost increases and the inflationary pressures impacting the U.S. economy, along with declines in customer usage due to warming weather trends, National Fuel's current rates do not provide it with a reasonable opportunity to earn a fair rate of return on its investments in rate base.

Q. Explain why National Fuel's current rates are insufficient to support its current and planned operations.

A. As reflected in National Fuel Exhibit A (FPFTY) Schedule A-1, the Company's operations are projected to produce an overall return on rate base of 6.30%, and a return on common equity of 6.87%, during the FPFTY. As explained by National Fuel witness Mr. Josh Nowak (National Fuel Statement No. 10), these levels of returns are not adequate based on an analysis of applicable financial market data and the risks confronted by the Company and are well below the rates of return generally afforded to public utilities. Unless National Fuel receives the requested rate relief, the Company's returns will continue to erode and jeopardize its ability to attract the capital needed to make the reasonable and necessary investments in gas infrastructure and the human resources that are necessary to maintain and enhance the provision of safe and reliable natural gas service to its customers.

Q. How do National Fuel's current rates compare to other gas utilities in Pennsylvania?

A. A comparison of residential heating bills in Chart 1 below from the PAPUC 2025 Rate Comparison Report issued in April 2025 illustrates that National Fuel has the lowest total monthly bills and the lowest customer and distribution charges in the Commonwealth amongst large gas utilities.



On a total bill basis, National Fuel's average monthly bill for residential heating customers using 15 Mcf per month was $124.56, which is $78.11 lower than the group average of $202.67. This favorable variance compared to the group has widened since the Company's last rate case filed in 2022. Specifically, in its 2022 rate case, National Fuel

was $56.98 lower than the group average compared to the current favorable variance of $78.11 stated above. Looking at just the delivery charge portion of the bill (customer and distribution charges, including impact of OPEB surcredits), the average National Fuel residential heating customer using 15 Mcf per month currently pays just $62.61 per month, which is $54.63 lower than the group average of $117.24 and $34.10 lower than the next lowest gas utility.

The PAPUC 2025 Rate Comparison Report also found that National Fuel's small commercial, medium commercial, large commercial, and industrial customers pay an average of 30-43% less for their natural gas bills than customers served by other large gas utilities in the Commonwealth.

Q. Has National Fuel evaluated the impact of its proposed rate increase on average customer bills?

A. Yes. As presented in Table 1 below, the Company has evaluated the impact of its proposed rate increase on the average monthly bill of residential heating and commercial heating customers. The residential heating customer impact includes the proposed energy efficiency pilot program rider and reactivation of Rider I related to OPEB surcredits. At current rates, the Company's proposed new rates will increase residential customer bills by 5.9%.

Table 1 - AVERAGE MONTHLY BILL IMPACT

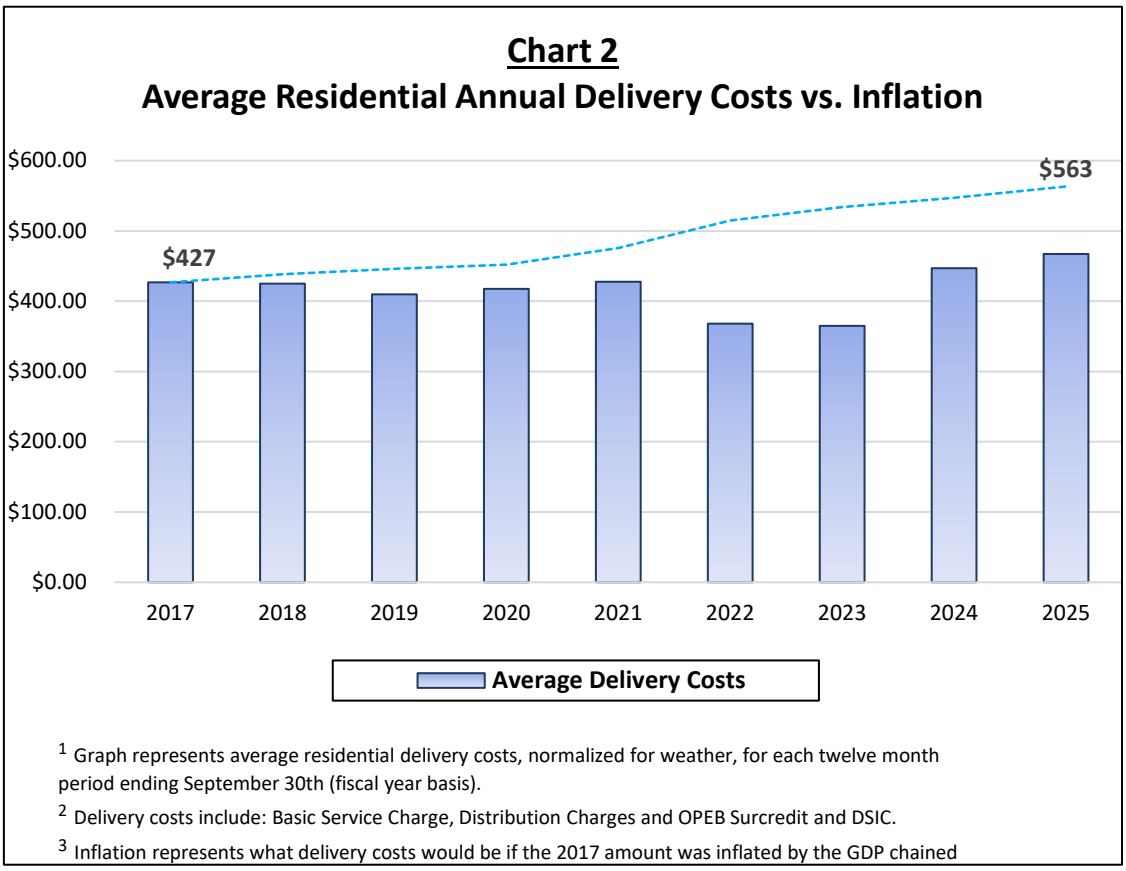
Customer Class	Average Usage per Month	Current Rates	Proposed Rates	($) Increase	(%) Increase
Residential	80 ccf	$83.49	$88.44	$4.95	5.9%
Commercial / Public Authority					
SCPA < 250	103 ccf	$101.91	$107.85	$5.95	5.8%
SCPA > 250	412 ccf	$276.57	$288.37	$11.80	4.3%
LCPA	340 Mcf	$1,113.90	$1,143.80	$29.89	2.7%

Q. Why are the projected customer bill increases fair and reasonable?

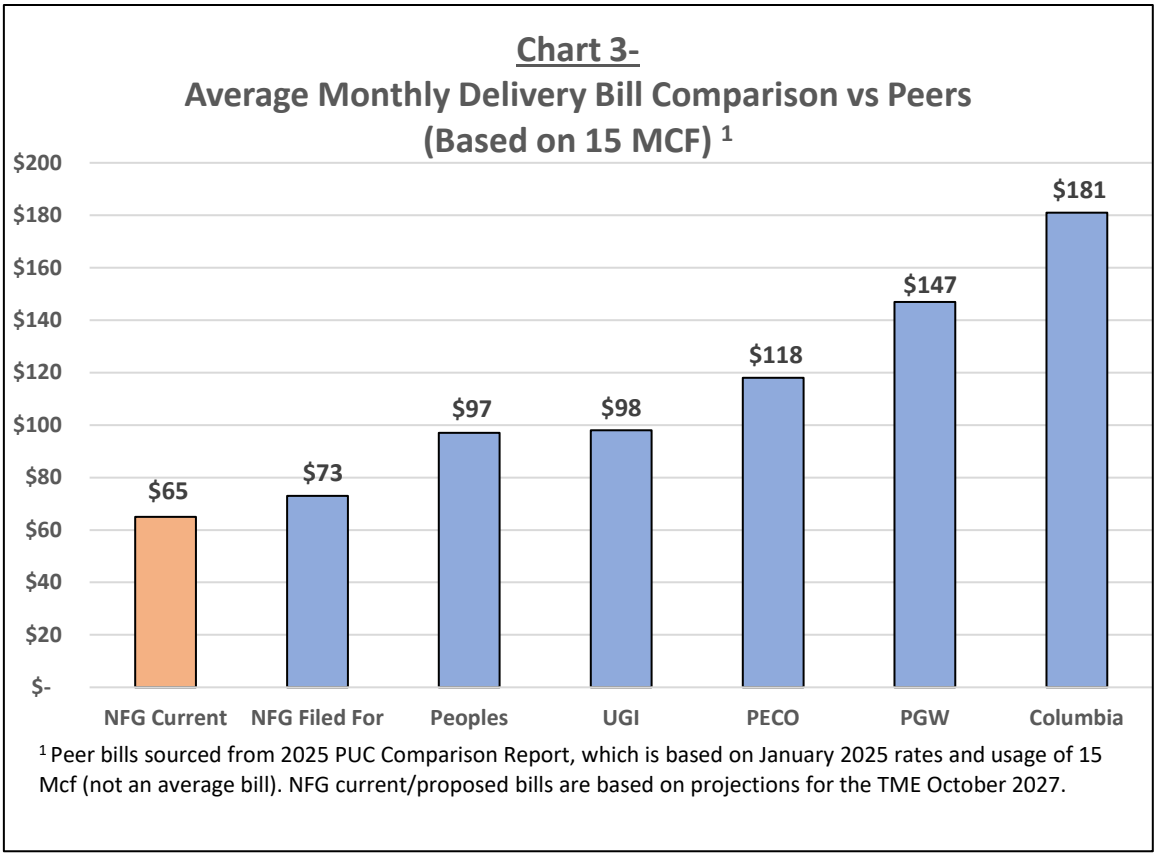
A. The average customer bill impacts set forth in Table 1 above are fair and reasonable for several reasons.

- First, the increase in delivery rates support the Company's ability to provide safe and reliable gas distribution service for its customers, including critical investments to replace aging gas infrastructure and modernize the Company's facilities. The additional revenues are also necessary to address inflationary pressures on the Company's operating expenses and lower customer usage trends, both of which have been outside of the Company's control.
- Second, this is only the second requested increase to delivery rates that National Fuel has had since 2007. As demonstrated in Chart 2 below, the Company's average annual delivery charges normalized for weather have increased marginally from $427 per customer in 2017 to $467 per customer in 2025. Had the Company's delivery rates kept pace with inflation since 2017, as measured by

the U.S. Bureau of Labor Statistics' Consumer Price Index ("CPI"), the average residential customer would be paying $563 annually.



- Third, even with this increase, we anticipate that National Fuel's residential heating customers will continue to have the lowest average total bill and lowest average delivery charges in the Commonwealth, as demonstrated in Chart 3 below.



- Finally, National Fuel continues to demonstrate exceptional management performance and diligence in mitigating rate increases for customers. Specifically, as discussed further below, National Fuel continues to be a leader in customer service and emergency response within the state. Additionally, management also continues to be prudent in its spending and operation of the business which can be seen through no requested rate recovery for Defined Benefit Pension and Other Post Employment Benefit costs (refer to Mr. Michael P. Weidner's Direct Testimony No. 5), reduced rate recovery requested for Research, Development & Demonstration ("RD&D") initiatives (refer to Mr. Erik M. Solomon's Direct Testimony No. 18), prudent management of O&M expenses as discussed later in my testimony, and the benefit customers receive from the repairs deduction that

has a meaningful impact on income tax expense and revenue requirement in this case (refer to Ms. Erica L. Forcucci's Direct Testimony No. 12).

IV. RATE RELIEF DRIVERS

Q. What are the key drivers of the Company's need for rate relief?

A. The Company's need for rate relief is largely being driven by the following three items:

- Increasing investment in rate base, which is expected to grow as the Company accelerates its leak-prone pipeline replacement and system modernization activities to ensure and enhance the safety of its distribution system.
- Increasing levels of operating costs, which are principally being influenced by broader macroeconomic trends. More specifically, higher employee wages and compensation are necessary to stay competitive with the current labor market, additional information technology and cybersecurity costs are required to ensure digital security and reliability, and continued inflation on materials and services are driving overall costs higher.
- Declining levels of residential and commercial customer usage for heating due to warming weather trends.

I address each of these key drivers in greater detail below.

1. Investment in Rate Base

Q. How does the Company's current investment in net plant compare to the net plant that was included in the last rate case?

A. The investment in net plant in-service for the FPFTY ended October 31, 2027 is projected to be $637 million. When the Company last requested a rate increase for the FPFTY ended July 31, 2024, the Company's investment in net plant was approximately $496 million. The $141 million increase in net plant has largely been the result of continued investments necessary to enhance and maintain the safety and reliability of the Company's distribution system, which include the replacement of aging gas plant infrastructure. Since 2016, the Company's Systematic Replacement Program has eliminated over 371 miles of leak-prone bare steel and wrought iron pipeline and 7,337 base steel services. The Company's distribution system does not have any cast iron pipe. At its current pace of replacing approximately 57 miles per year, National Fuel plans to target retirement of all leak-prone pipe by 2039.

Q Does the Company utilize the Distribution System Improvement Charge ("DSIC") as a way to manage the recovery of incremental investments in plant in-service between rate cases?

A. Yes. The Company implemented the DSIC on January 1, 2025 and has calculated an appropriate and allowable surcharge to customers in accordance with the tariff.

Q. Why isn't the DSIC providing enough return to avoid the need to file this rate case and request for additional recovery?

A. The DSIC is currently capped at 5% of distribution revenues. National Fuel projects that this cap will be met during the first calendar quarter of 2026. As such, the Company will not be able to earn a return on incremental plant investments placed in-service after the

DSIC cap it exceeded. As discussed in the direct testimony of Mark C. Shaefer (National Fuel Statement No. 9), the Company has seen a significant increase in the cost of Leak Prone Pipe ("LPP") replacements and filed an Amended Long-Term Infrastructure Improvement Plan ("LTIPP") in December 2025.

2. Operating Cost Inflation

Q. Present and discuss the trends in the Company's levels of operating expenses since its last rate case in 2022.

A. Like most businesses today, National Fuel has been impacted generally by the inflationary pressures that continue to challenge our economy. Despite these challenges, management has been successful in holding several categories of costs relatively steady for the last three years, noting both increases and decreases in operating expenses, as discussed in the Direct Testimony and exhibits of Company Witness Mr. Anthony Formato (National Fuel Statement No. 3). When considering the net impact of operating expenses since the last rate case, the biggest item impacting the increase in operating expenses is net labor.

Q. Why is net labor the biggest driver of the increase in operating expenses since the last rate case in 2022?

A. National Fuel's net labor expenses have been impacted in two ways. First, the Company continues to manage employee retention through competitive wages and benefits to ensure that qualified and trained employees are not lost to other employers. The net labor expenses are higher as a result of annual merit increases, forecasted variable pay

incentives and a small increase in headcount from the HTY ended September 30, 2025. Second, net labor has increased due to the results of recent negotiations and ratification of collective bargaining agreements impacting approximately half of National Fuel's workforce. As discussed further in the Direct Testimony of Company witness Ms. Valerie L. Hawthorn Wagner (National Fuel Statement No. 4), the resulting contract will include an average increase of 13% to hourly labor rates in the FTY and an additional 3% in the FPFTY. These changes, along with a persistently tight and competitive labor market, have placed upward pressure on salaried and non-union employee wages.

2. Weather Impacts on Usage

Q. How has customer usage changed since the Company's last rate case in 2022?

A. The Company's residential and commercial usage has been significantly impacted by a trend of warmer winters in the Company's service territory. As noted in Table 4 below, the actual heating degree days reported by the National Oceanic and Atmospheric Administration ("NOAA") for Erie, PA over the last four fiscal years have been warmer than the normal heating degree days for the 15 years calculated from 2010 – 2024. National Fuel used a 15-year heating degree day average during its last rate case in 2022. The trend of warmer winters and extreme volatility in heating degree days from year to year has had a significant impact on the Company's throughput and revenues.

TABLE 4 - NOAA HEATING DEGREE DAYS - ERIE, PA

TME	Heating Degree Days	Colder / (Warmer) than 2010-2024 Avg. [1]
2010-2024 Avg.	5,654	Normal [2]
Sep 2022	5,318	(6%)
Sep 2023	5,537	(2%)
Sep 2024	4,816	(15%)
Sep 2025	5,585	(1%)
FPFTY [3]	5,485	(3%)

(1) Percentages represent difference between actual experienced HDD vs. normal HDD based on a 15-year average.

(2) Normal weather established based on 15-year average normal HDD from 2010-2024.

(3) Twelve months ended July 31st, 2024. HDD are based on 10-year average (2015 - 2024).

Q. How does the Company address the impact of warmer and volatile weather trends on customer usage in this rate filing?

A. The Company proposes taking two steps to consider and mitigate the adverse impact of warmer weather trends on customer usage:

- First, the Company modified its volumetric forecasting approach to use a 10-year average of heating degree days data published by NOAA as observed at the Erie, Pennsylvania International Airport from 2015 to 2024. Prior to the last rate case, the Company had used a 30-year average for forecasting purposes. However, as recent winters have trended significantly warmer than normal, the Company moved to a 15-year average of annual heating degree days in the last rate case in

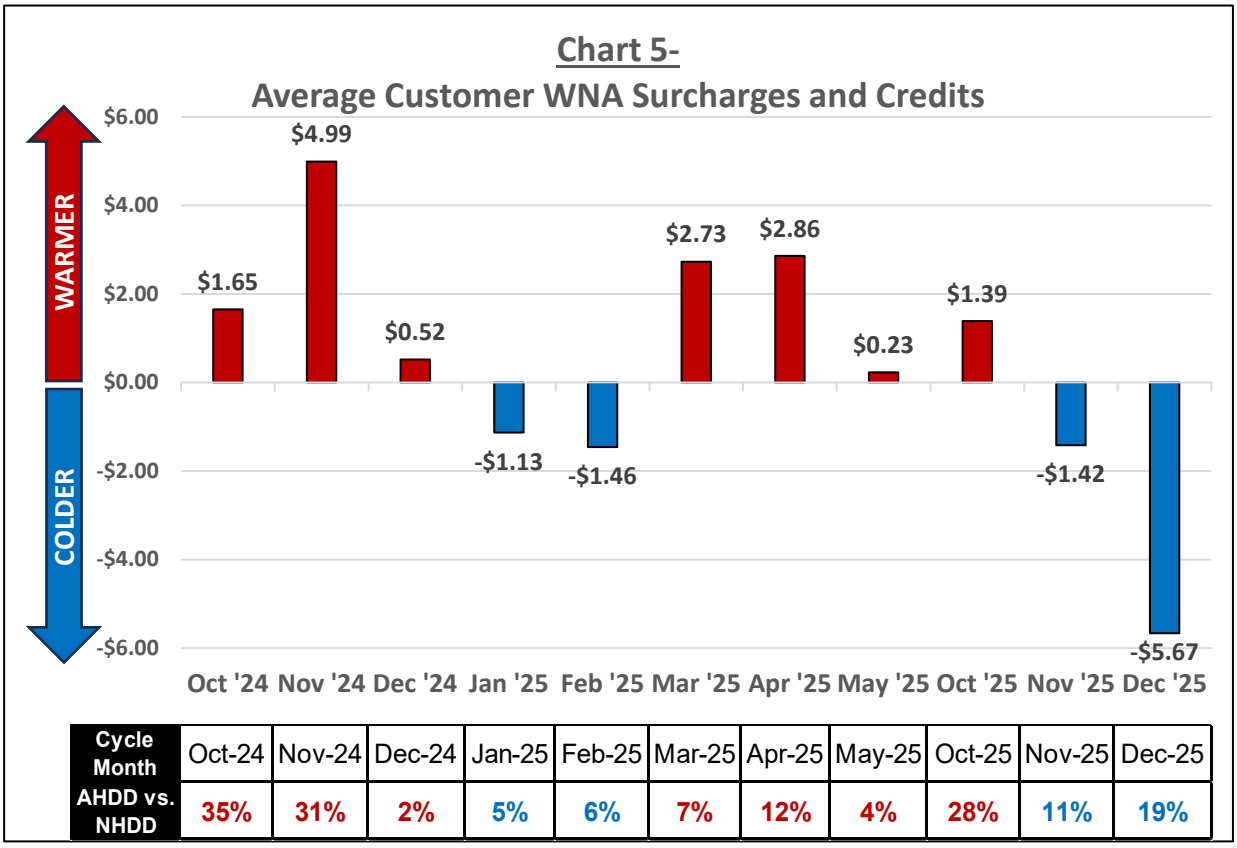
2022 and believes that further update to a 10-year average is more indicative of a normal winter in the Company's service territory. This is consistent with Columbia Gas of Pennsylvania's recent rate case (R-2025-3053499) where the Commission adopted a 10-year HDD average for WNA purposes. Company witness Cathryn E. Hilliard provides additional details in her direct testimony (National Fuel Statement No. 13).

- Second, the Company is proposing to make the Weather Normalization Adjustment ("WNA") mechanism permanent to help insulate the Company's delivery revenues when actual weather is warmer than normal and protect customers from higher bills when actual weather is colder than normal. Company witness Mr. John D. Taylor will testify in his direct testimony (National Fuel Statement No. 19) to the details of the Company's WNA mechanism, benefits to ratepayers, and why the mechanism is fair and reasonable for the Company.

Q. What has been the experience with the current pilot WNA mechanism implemented in the last rate case?

A. In the last rate case, a pilot WNA mechanism was approved that provides for a surcharge or credit to customer bills, outside of a 3% deadband, from October to May to address volatility in weather as discussed above. The pilot program has worked as designed since implementation with no significant customer issues. The WNA is a symmetrical mechanism, benefiting both the Company and customers. Chart 5 below shows historical surcharges or credits on average per customer account from October 2024 through December 2025, demonstrating that the WNA mechanism is working as intended to

reduce volatility for customers and provide predictability for the Company to earn authorized revenues without being impacted by weather factors outside the Company's control.



Cycle Month	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Oct-25	Nov-25	Dec-25
AHDD vs. NHDD	35%	31%	2%	5%	6%	7%	12%	4%	28%	11%	19%

Normal heating degree days ("NHDD") are based on NOAA 2006-2020 set. Values shown represent the average for that month's billing controls. Billed WNA is based on the degree days for the customer-specific billing periods.

MANAGEMENT EFFECTIVENESS AND PERFORMANCE

Q. Why is the Company's record on management effectiveness and performance relevant to this rate filing?

A. As I will demonstrate in my testimony to follow, National Fuel continues to have an exceptional record on management effectiveness and performance that provides significant value to our customers in the provision of safe, reliable, and affordable natural gas utility service, and supports why the Company's proposed rate increase is just and reasonable.

Q. Identify the key areas where National Fuel's management effectiveness and performance record excels and provides added value for customers.

A. I will discuss the following key areas related to National Fuel's management effectiveness and performance:

- Safety Culture
- Quality Customer Service
- Information Technology and Cybersecurity
- Affordability and Operational Efficiencies
- Universal Services and Customer Payment Assistance
- Community Engagement and Impact on Local Economies

NFG's 2024 Corporate Responsibility report provides additional data and disclosure related to the topics identified above. The report is publicly available on National Fuel's website at https://www.nationalfuel.com/corporate/our-guiding-principles/

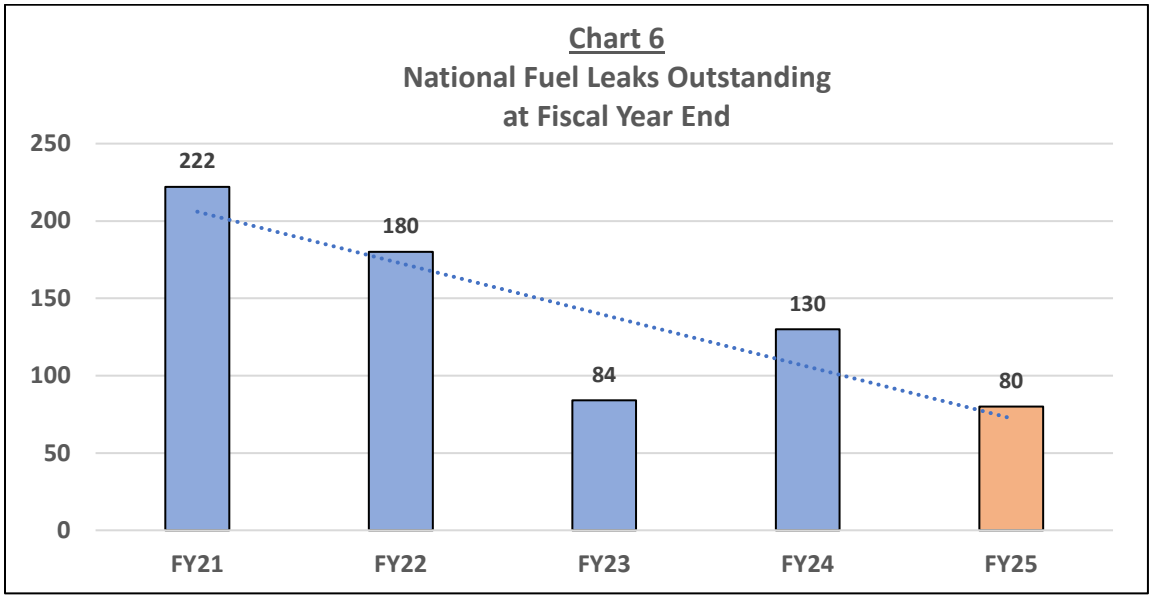
Q. Discuss the initiatives and performance related to National Fuel's <u>Safety Culture</u>.

A. National Fuel's highest priority is safety. We value all of our customers, employees, contractors and communities, and work diligently to establish a culture of safety that is

embraced throughout the entire organization. To that end, National Fuel has a long-standing culture of safety that encourages continuous improvement of our safety performance, with demonstrated success in the following areas:

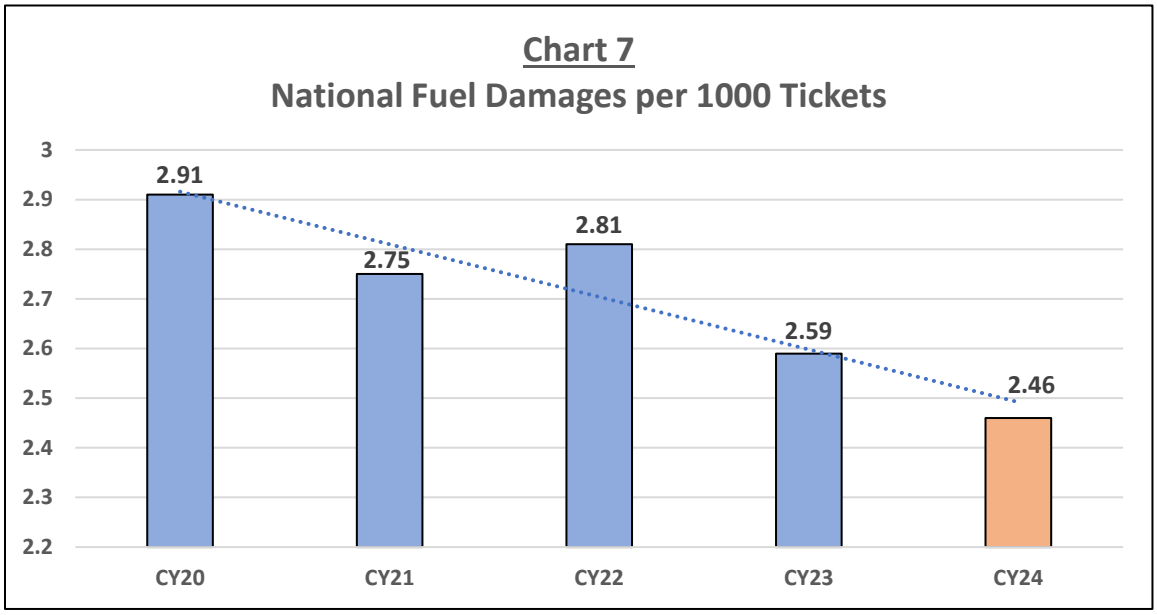
Gas System Integrity: As noted previously in my testimony, the Company has accelerated its pipeline replacement program so that all remaining bare steel and wrought-iron mains and transmission lines will be removed by 2039.

The Company continues to be focused on finding and repairing leaks on its system. The number of outstanding leaks at year end and the number of leaks discovered during the year continues to trend lower. As shown in Chart 6 below, the number of leaks outstanding at the end of FY25 was reduced by more than 50% over the last 5 years. Leaks outstanding have been reduced by more than 80% over the last 10 years.



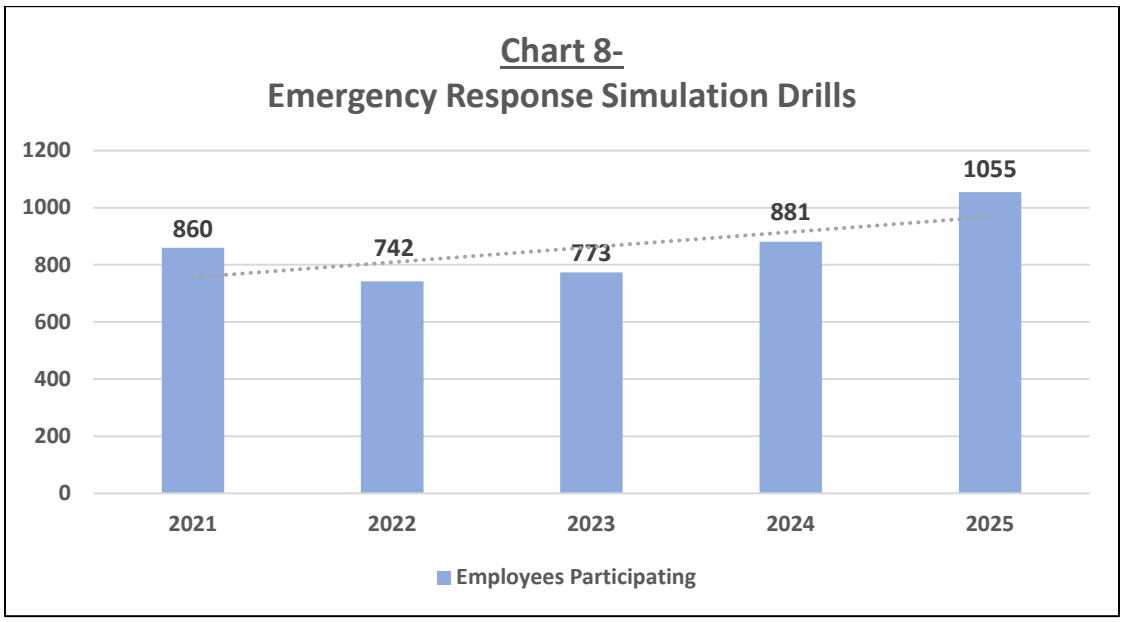
Damage prevention continues to be a top priority for National Fuel. The Company dedicates significant resources to educate and train contractors, customers, and the public

on the importance of damage prevention and safe excavation practices and ensure that the Company's facilities are properly marked before excavation begins. The Company utilizes pipeline safety mailers, social media, billboards, television, and radio advertising to spread awareness on damage prevention which continues to yield exceptional results. As shown in Chart 7 below, the Company's damages continue to trend lower and as of the end of calendar year 2024, the Company experienced a 28% decrease in excavation damages over the last five years.

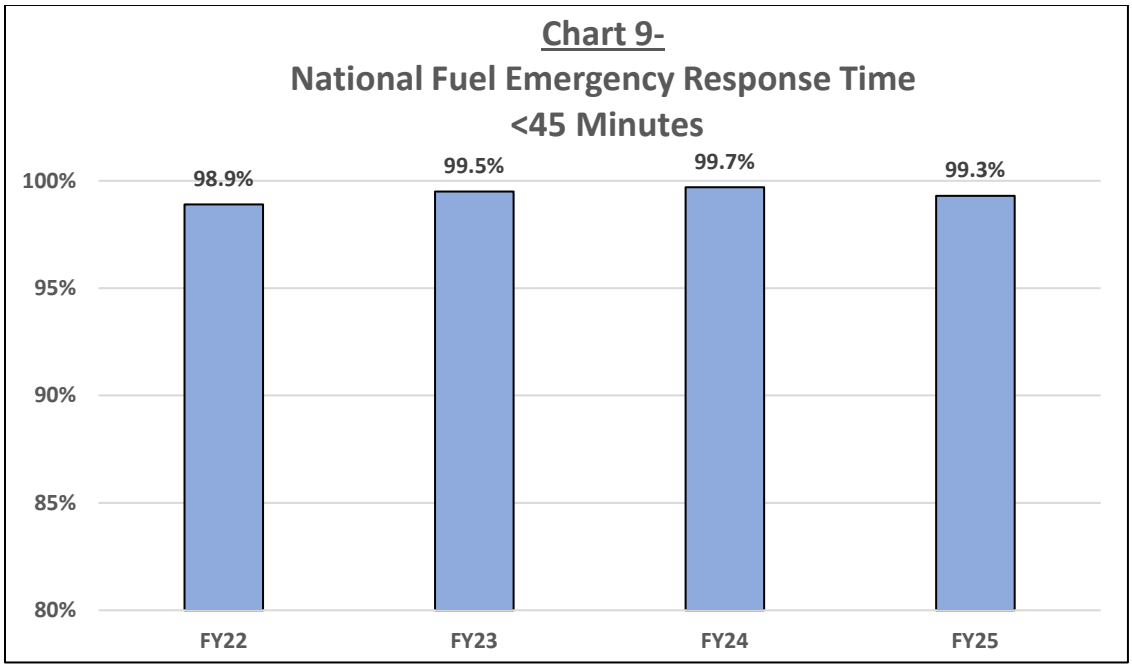


Customer Safety: National Fuel continues to educate and build awareness with its customers, so they know what to do if they smell gas in their homes. We also work with local first responders to provide appropriate gas emergency training. In calendar year 2025, the Company held more than 25 meetings with over 900 participants including local emergency responders. Additionally, the Company held 60 emergency response simulation drills with more than 1,000 participants. As shown in Chart 8 below, this is an

increase of more than 20% over five years, which demonstrates the Company's continued commitment to safety.



When emergencies occur, the Company places a high priority on having a rapid response and conducting a thorough investigation once we arrive onsite. As shown in Chart 9 below, the Company's average emergency response time is less than 45 minutes more than 99% of the time, which is exceptional given the rural nature of National Fuel's service territory.



Employee Safety: Safety programs and management practices ensure that a safety culture is prioritized throughout the Company. National Fuel continues to enhance and expand upon long standing safety training and education initiatives. The Company's safety focus has yielded tremendous results. In 2025, NFG's consolidated operations reported the lowest Occupational Safety and Health Administration 'Days Away, Restricted or Transferred' Rate in its history. In addition, the Company has successfully implemented a Safety Improvement Team ("SIT") whose primary job is to proactively identify potential areas of continuous safety improvement. Through the efforts of the SIT, the Company holds Safety Days which are hands-on training days that bring Operations employees together to reinforce our commitment to safety. These sessions focus on essential safety topics such as personal protective equipment, emergency response procedures, damage prevention, trenching and shoring practices, and overall hazard awareness. The SIT has also facilitated increased involvement in safety leadership

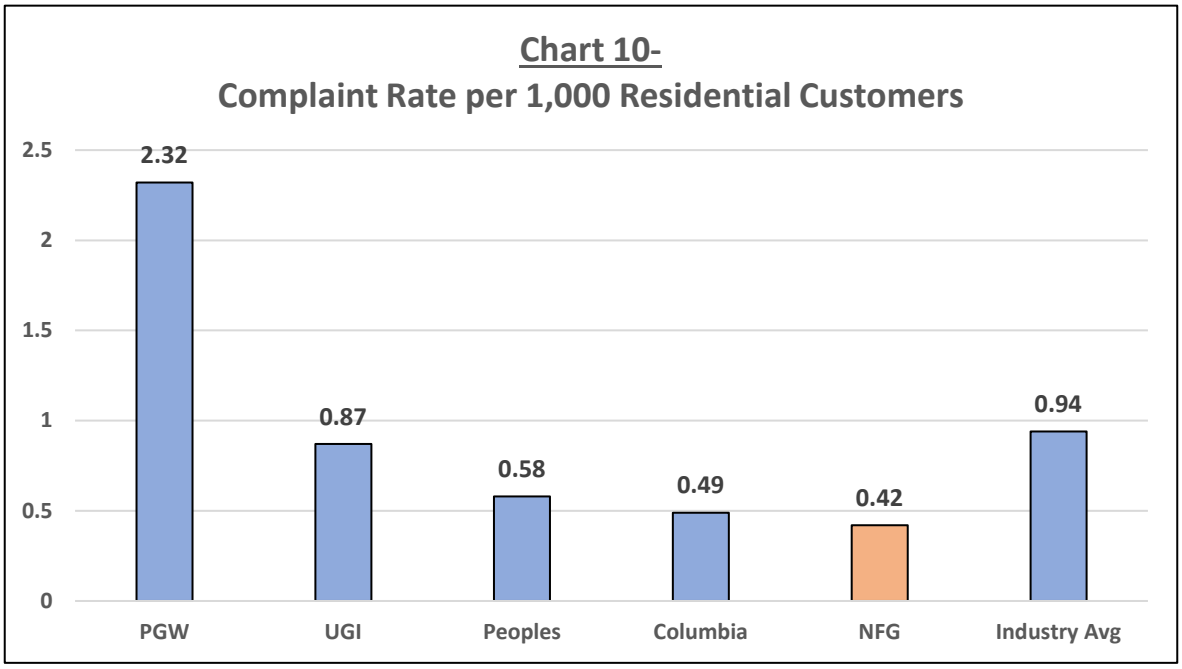
meetings to include all levels within the organization, including hourly employees. This has led to a meaningful enhancement of safety culture throughout the Company and quality recommendations for continuous improvement.

Company witness Mr. Jason Scouten's direct testimony (National Fuel Statement No. 16) provides additional detail on National Fuel's safety culture and our efforts to continuously improve our safety performance across the Company.

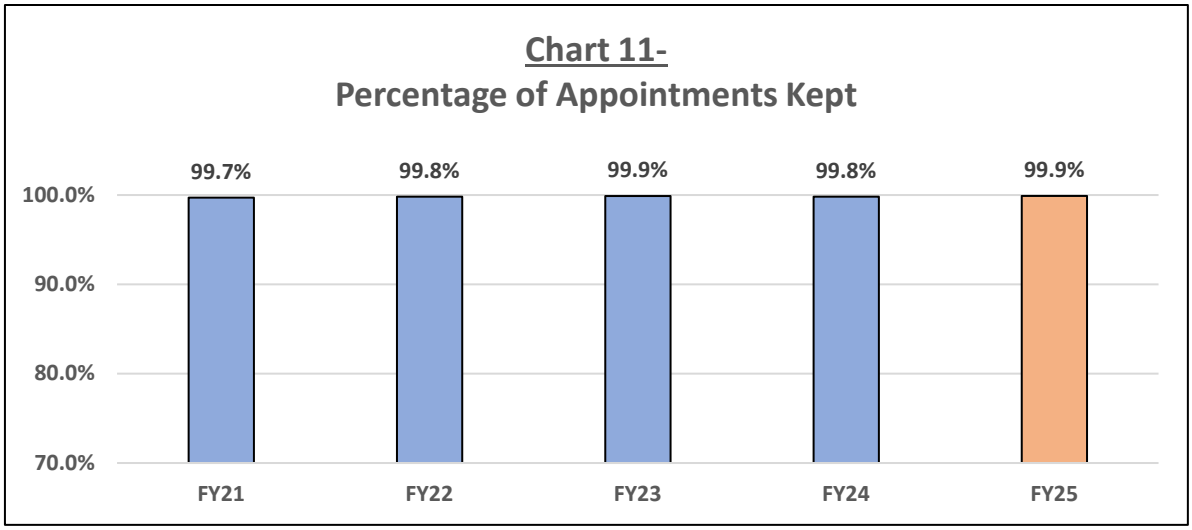
Q. Discuss the initiatives and management's performance related to National Fuel's <u>Quality Customer Service</u>.

A. National Fuel strives to deliver the quality service that our customers expect and deserve. As a result of this customer-driven approach, National Fuel continues to achieve high levels of customer satisfaction. We rate consistently with our natural gas utility peers in Pennsylvania but at significantly lower cost, as discussed further in my testimony below. Information published in the Commission's 2024 Customer Service Performance Report and Evaluation (the "Report") in December 2025 supports the quality of National Fuel's customer service. In the Report, National Fuel scored at or above the Pennsylvania state average for natural gas distribution companies in many of the report's satisfaction survey categories, including lowest in call abandonment, satisfaction with representative's handling of the contact and ease of reaching the Company, and second only to one other utility in answering customer calls within 30 seconds. This is particularly impressive since the Company does not employ an automated voice system to handle customer calls. The Report also highlights National Fuel's low complaint rate compared to our peers. As

shown in Chart 10 below, National Fuel's Residential Consumer Complaint Rate per 1,000 residential customers is the lowest among companies rated and is significantly better than the industry average:



The Company also demonstrates strong customer service by acknowledging that customers' time and schedules are important. As shown in Chart 11 below, the Company has consistently maintained over 99% of appointments kept for the last five years. This strong performance is attributed, in part, to improved appointment windows for customers of four-hour time frames instead of eight hours, continued evaluation of improved customer communication channels and effective management of our workforce in a manner that ensures appointments are kept.



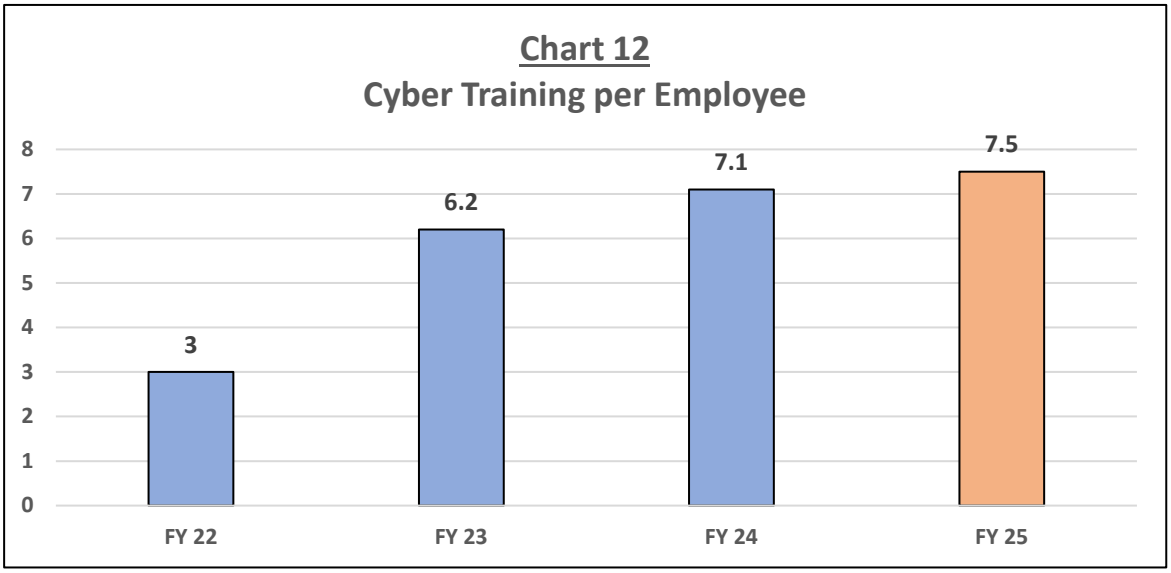
Q. Discuss the initiatives and management's performance related to National Fuel's Information Technology and Cybersecurity.

A. Strong information security is critical to the Company's success and impacts our ability to provide safe and reliable service and protect customer data. National Fuel has made significant enhancements to continue to strengthen the Company's cybersecurity posture. These include, among other things, increasing the number of applications with single sign-on ("SSO") capabilities, increasing the nature and frequency of cyber trainings for employees, aggressively managing our patch management practices for applications and actively addressing system vulnerabilities, and improved response times for Security Information and Event Management ("SIEM") alerts. I will discuss each of these in detail below. The metrics provided are on a company-wide basis based on the nature of the Information Technology department and how cybersecurity is managed.

National Fuel has significantly expanded its use of SSO applications since 2022, increasing the total number to 85% of enterprise applications in calendar year 2025. This

growth reflects a strategic shift toward stronger security, streamlined access, and improved user experience across the organization. Aside from access to applications, the Company has also improved the way employees access the Company's network through enhancements to multi-factor authentication and facial recognition capabilities. Another important area of cybersecurity that the Company has seen strong performance and results is in our management of system vulnerabilities and SIEM alerts. Compared to the rest of the natural gas industry, National Fuel has notably fewer vulnerabilities. In a recent review completed by the Transportation Security Administration of cybersecurity practices at the top 100 gas companies throughout the country, National Fuel Gas Company ranked among the top 10%. In 2025 the Company put a Command Center in place to further enhance both physical and cyber security monitoring and response. The Command Center is designed to reinforce efforts already in place to provide safe and reliable service and protect customer data.

All cybersecurity practices are enhanced or supported by regular training of employees. Management has shown excellent progress in increasing the frequency of trainings that employees take and ensuring that employees hear from information technology leaders during live training sessions and company-wide meetings. Trainings have evolved in the last five years to include quarterly training and phishing tests with remedial training as necessary, approximately eight targeted educational awareness sessions per year on a variety of topics, and focused engagement during Cyber Security Awareness month. As shown in Chart 12 below, employee training and engagement related to cybersecurity has more than doubled in the last four years.



Q. Discuss the initiatives and management's performance related to National Fuel's Affordability and Operational Efficiencies.

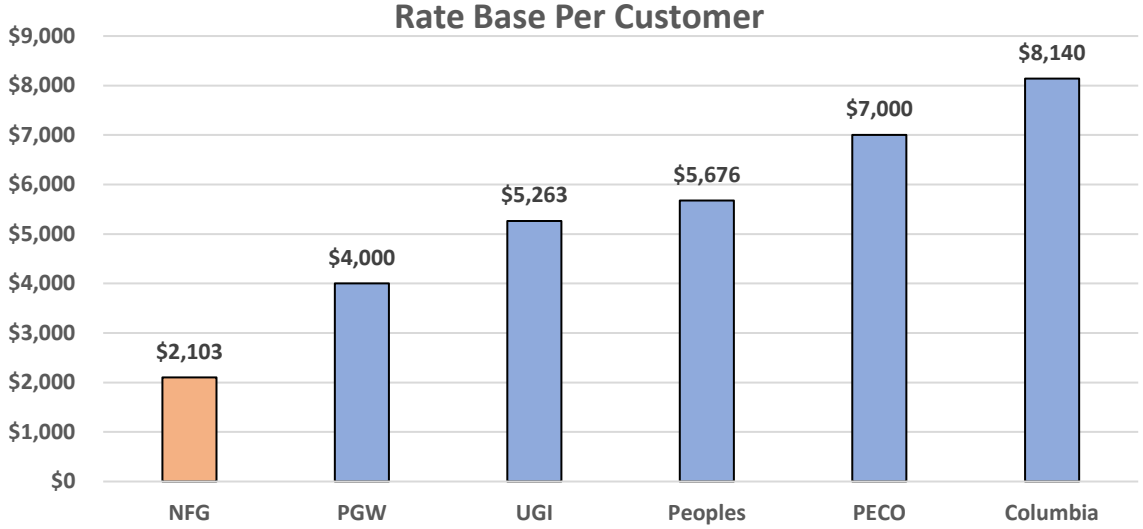
A. As I presented earlier in my testimony, National Fuel currently has the lowest total bills and delivery rates in the Commonwealth amongst large natural gas utilities. National Fuel's customers have benefited from consistently low delivery rates for more than a decade while benefiting from access to the competitively priced natural gas supplies produced in Pennsylvania. Even with the proposed rate increase, the Company anticipates that it will continue to lead its Pennsylvania natural gas peers in affordability.

National Fuel's focus on cost control, productivity, and ability to optimize operational efficiencies is a major driver of the Company's ability to keep its delivery rates low. As Company witness Ms. Valerie Hawthorn Wagner presents in her direct testimony (National Fuel Statement No. 4), the Company is able to efficiently utilize

shared back-office departments, such as Accounting and Finance, Human Resources, Purchasing and Procurement, and Engineering, with employees that provide services and spread costs across multiple affiliated companies. The Company can also deploy and utilize field employees more efficiently, leveraging its overlapping operational footprint with NFG Supply to share resources to meet day-to-day needs of maintaining our infrastructure and serving our customers.

As a result of the synergies created by NFG's integrated structure, the Company is able to operate the business at a much lower cost than if it was a standalone utility. As demonstrated in Chart 14 below, National Fuel has the lowest rate base per customer in the Commonwealth.

Chart 13-
Rate Base Per Customer

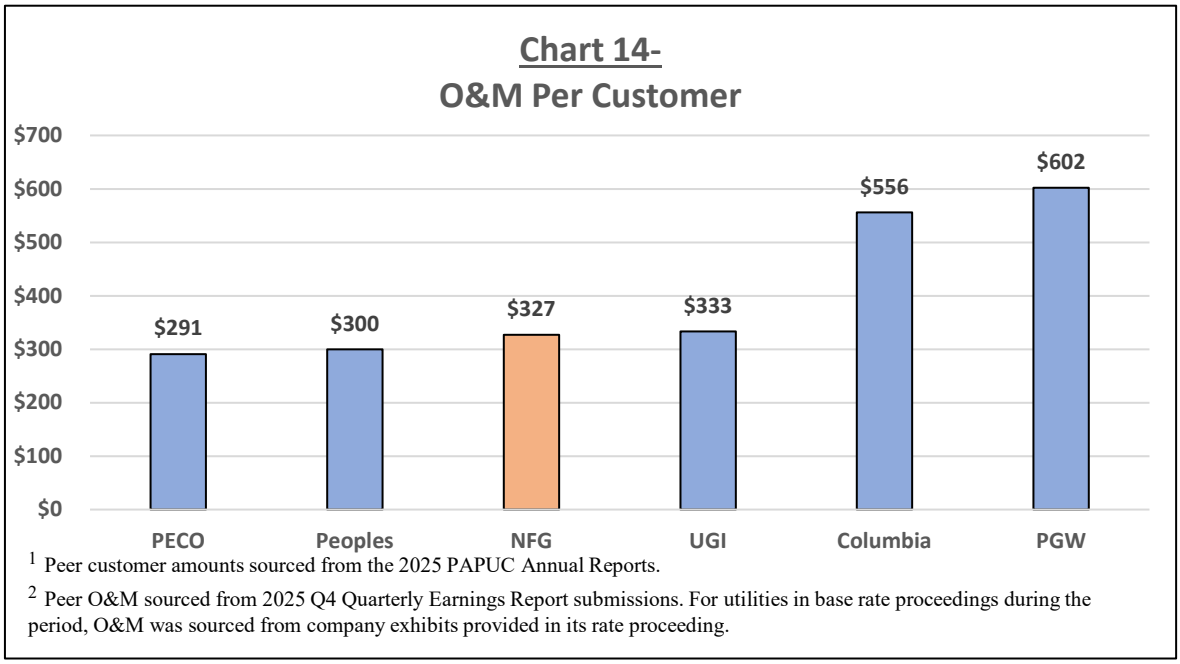


[1] Peer customer amounts sourced from the 2025 PAPUC Annual Reports.

[2] Peer rate base sourced from 2025 Q4 Quarterly Earnings Report submissions. For utilities in base rate proceedings during the period, rate base was sourced from company exhibits provided in its rate proceeding.

National Fuel also ranks favorably among its gas utility peers in Pennsylvania for O&M expense per customer as shown in Chart 15 below. National Fuel falls in line with

PECO, Peoples and UGI, but, importantly, has significantly fewer customers than each of those utilities. Many O&M expenses are fixed and would benefit from economies of scale if National Fuel served more customers, which would further lower our O&M expenses per customer.



[1] Peer customer amounts sourced from the 2025 PAPUC Annual Reports.

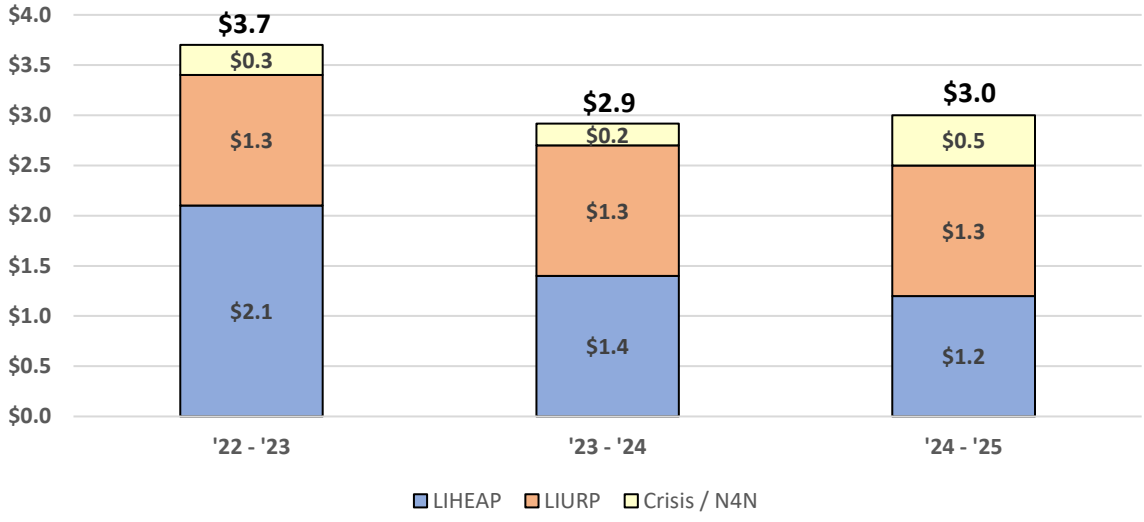
[2] Peer O&M sourced from 2025 Q4 Quarterly Earnings Report submissions. For utilities in base rate proceedings during the period, O&M was sourced from company exhibits provided in its rate proceeding.

Q. Discuss the initiatives and management's performance related to National Fuel's <u>Customer Assistance Programs</u>.

A. National Fuel continues to be attentive to meeting the needs of its low-income customers through its customer assistance programs. In 2024, National Fuel voluntarily converted its legacy low income discount based program (Low Income Residential Assistance Program) to the current Customer Assistance Program (CAP) to better meet the needs of customers. Additionally, National Fuel successfully petitioned the Commission to

approve a modification to the existing Low Income Usage Reduction Program (LIURP) through the Low Consumption-LIURP (LC-LIURP) pilot program to expand eligibility to customers based on 200% of Federal Poverty Income Guidelines and lowered consumption thresholds from 1300 ccf to 900 ccf. In his direct testimony (National Fuel Statement No. 17), Company witness Mr. Matthew W. Stoops Jr. further explains the Company's CAP, LIURP, Neighbor for Neighbor program, as well as the Company's diligent efforts to connect its low-income and payment troubled customers with all available forms of assistance (e.g., LIHEAP). Lastly, Company witness Courtney T. Mann (National Fuel Statement No. 14) provides an overview of the Company's proposal for Rider I that would reinstate that refund of OPEB funds (also discussed above) and proposes a one-time bill credit of $30 totaling $1.025 million to CAP, Level 1 and Level 2 customers. Chart 16 below shows the Company's consistent efforts in meeting the needs of low-income customers.

Chart 15-
NFGDC PA LIHEAP and Other Assistance Programs



Q. Discuss the initiatives and management's performance related to National Fuel's Community Engagement and Impact on Local Economies.

A. In 2025, NFG, the National Fuel Gas Company Foundation ("Foundation"), and our employees supported the communities where we live and work by donating more than $1.7 million. The Foundation's Employee Charitable Giving program aligns a large portion of National Fuel's charitable support with the wishes and generosity of our employees. Through this gift program, the Foundation matches employee donations dollar-for-dollar up to $750 a year to employee-chosen nonprofits. In addition, the Company's "Faces of Fuel" volunteer program provides opportunities for employees to volunteer and participate in philanthropic efforts in our local communities. In 2025, employees donated more than 4,000 hours by participating in volunteer events.

In addition to philanthropic endeavors, National Fuel, and NFG as a whole continue to have a significant impact on the local economies of the communities we serve. We contribute to the regional economy through employee wages, payments to local vendors, taxes, royalties and capital investment.

National Fuel remains committed to hiring and developing qualified individuals who can enhance and contribute to the diversity of our workforce and reflect the communities that we serve. In support of this effort, over the last two years the Company has provided several trainings related to mitigating bias, harassment and discrimination, and customer respect. The Company also collaborates with colleges and universities in its Pennsylvania service territory for diverse candidate referrals and works alongside and supports organizations that promote diversity. These include, but are not limited to,

Booker T. Washington Center, Multicultural Community Resource Center, Charter School of Excellence, Erie VA Medical Center, and Veterans Leadership Program.

Q. How does the Company propose that its exceptional management effectiveness and performance record be considered in this rate filing.

A. As my testimony demonstrates above, National Fuel is a leader and sets the bar in many of the areas and metrics that indicate exceptional management effectiveness and performance. National Fuel's management effectiveness and performance provides significant value to its customers and the communities we serve, namely through the provision of safe and reliable natural gas service with quality customer care at the most affordable rates in the Commonwealth. As a result, the Company is requesting in this rate filing that an additional 25 basis points be included in the recommended rate of return on common equity to reflect the value of National Fuel's management effectiveness and performance record. Mr. Joshua C. Nowak, the Company's rate of return expert, includes and provides further discussion on the 25-basis point adjustment in his direct testimony (National Fuel Statement No. 10).

INTRODUCTION OF COMPANY WITNESSES

Q. Please identify and introduce the other witnesses providing direct testimony on behalf of National Fuel in this proceeding and the subject matter of their testimony.

A. In addition to my testimony, the following witnesses are providing testimony in support of the Company's rate request:

Donald N. Koch (National Fuel Statement No. 2) is a Lead Rate Analyst in National Fuel's Rates and Regulatory Affairs department. Mr. Koch will present the Company's revenue requirement model supporting the Company's proposed rate increase (National Fuel Exhibit A (Fully Projected)). Mr. Koch also sponsors the revenue requirement models for the HTY and FTY periods.

Anthony T. Formato (National Fuel Statement No. 3) is a Director of Finance at National Fuel. Mr. Formato will provide testimony related to the O&M expense projections included in the Company's proposed revenue requirement, with the exception of employee benefits. Mr. Formato will explain in his testimony the inflationary pressures that the Company has experienced with labor and other operating costs, which is expected to persist through the FPFTY. Mr. Formato will also explain the Company's O&M and capital budgeting processes.

Valerie L. Hawthorn Wagner (National Fuel Statement No. 4) is the Managing Director of Human Resources for National Fuel. Ms. Hawthorn's testimony will discuss National Fuel's staffing and compensation programs, including ongoing programs designed to address employee recruitment and retention challenges, and to remain competitive with the current job market. Ms. Hawthorn will note that these initiatives, which are critical to maintain a safe system and quality customer service, have and are projected to result in higher labor costs for the Company.

Michael P. Weidner (National Fuel Statement No. 5) is the Senior Director of Human Resources for National Fuel. Mr. Weidner's testimony will discuss the nature and costs of the Company's employee benefits package, including costs relating to retirement and medical benefits anticipated in the FPFTY.

Monika M. Duszenko (National Fuel Statement No. 6) is a Rate Analyst II in National Fuel's Rates and Regulatory Affairs department. Ms. Duszenko's testimony will discuss and sponsor the schedules supporting the Company's projected net plant balances and rate base for the HTY, FTY, and FPFTY. Ms. Duszenko will also support the Company's cash working capital requirement included in rate base employing a lead-lag study on the Company's revenues and expenses.

Michael Maggioli (National Fuel Statement No. 7) is a Lead Accountant in National Fuel's Accounting department. Mr. Maggioli's testimony will discuss the Company's accounting process and sponsor exhibits and requirements that support the financial results for the HTY.

John J. Spanos (National Fuel Statement No. 8) is President of the firm of Gannett Fleming Valuation and Rate Consultants, LLC ("Gannett Fleming"). Mr. Spanos developed and supports National Fuel's claim for annual depreciation expense, the accumulated depreciation reserve, and the recovery of negative net salvage. His studies are presented in National Fuel Exhibit C (HTY), National Fuel Exhibit C (FTY), and National Fuel Exhibit C (FPFTY).

Mark C. Schaefer (National Fuel Statement No. 9) is a Senior Director in National Fuel's Engineering department. Mr. Schaefer's testimony supports the Company's capital budget and the projected capital additions to utility plant during the FTY and FPFTY periods. Mr. Schaefer will discuss the Company's LPP Systematic Replacement Program and plans to accelerate its replacement activities over the next 5 years. Finally, Mr. Schaefer will outline the Company's efforts to reduce leaks across the system, which has resulted in gas safety and environmental benefits.

Josh Nowak (National Fuel Statement No. 10) is a Vice President with Concentric Energy Advisors. Mr. Nowak presents expert testimony supporting the Company's claimed capital structure, cost of common equity and overall rate of return, as well as supplementing Mr. Welch's testimony on cost of debt in National Fuel Statement No. 11. Schedules and workpapers supporting Mr. Nowak's findings are presented in National Fuel Exhibit B (Rate of Return).

James C. Welch (National Fuel Statement No. 11) is a Vice President in National Fuel's Finance department. Mr. Welch's testimony discusses the Company's approach to financing, reviews the financial information provided to Mr. Nowak that supports the Company's claimed capital structure, and presents information that supports the Company's claimed cost of debt.

Erica L. Forcucci (National Fuel Statement No. 12) is the Managing Director of National Fuel's Tax department. Ms. Forcucci's testimony supports the Company's claims for federal and state income tax expense and the accumulated deferred income taxes included as an offset to rate base in the HTY, FTY and FPFTY periods. Ms. Forcucci's testimony also explains the tax adjustments included in the aforementioned periods.

Cathryn E. Hilliard (National Fuel Statement No. 13) is a Lead Utility Analyst in National Fuel's Rates and Regulatory Affairs department. Ms. Hilliard's testimony discusses the Company's volumetric demand forecasting process and provides schedules that support the Company's customer count and retail and transportation throughput forecast for the FTY and FPFTY periods.

Courtney T. Mann (National Fuel Statement No. 14) is a Rate Analyst in National Fuel's Rates and Regulatory Affairs department. Ms. Mann's testimony and exhibits support the development of the revenue forecast at current and proposed rates for the FTY and FPFTY periods, as well as the normalized revenues at current and proposed rates for the HTY period. Ms. Mann's testimony also addresses the Company's proposed rate design.

Wanya' D. Bruce (National Fuel Statement No. 15) is a Rate Analyst in the Company's Rates and Regulatory Affairs department. Mr. Bruce's testimony explains and supports significant revisions to the Company's tariff.

Jason Scouten (National Fuel Statement No. 16) is the Superintendent of National Fuel's Pennsylvania Operations department. Mr. Scouten's testimony will provide an overview of National Fuel's natural gas distribution system in Pennsylvania, discuss the Company's operations and construction activities, and support the Company's numerous programs and initiatives aimed at promoting and enhancing customer and employee safety, damage prevention, emergency response, leak management and service reliability.

Matthew W. Stoops Jr. (National Fuel Statement No. 17) is a Senior Manager in National Fuel's Consumer Business department. Mr. Stoops' testimony will discuss the Company's customer assistance activities and initiatives, including those related to Universal Services Programs.

Erik M. Solomon (National Fuel Statement No. 18) is the Senior Director of National Fuel's Energy Services department. Mr. Solomon's testimony supports the Company's proposals to implement the EE pilot program. Mr. Solomon will also discuss the Company's competitive position, including by-pass threats, and the Company's research, development and demonstration activities.

John D. Taylor (National Fuel Statement No. 19) is the Managing Partner of Atrium Economics LLC. Mr. Taylor's testimony supports the development and provides the results of the cost of service study that allocates the Company's gas distribution costs to

its rate classes. Additionally, Mr. Taylor's testimony supports the Company's proposal to convert the WNA pilot to a permanent mechanism.

Daniel C. Czechowicz (National Fuel Statement No. 20) is a Director in the Gas Supply Administration department. Mr. Czechowicz's testimony supports proposed changes to the Company's transportation programs.

Q. Does this conclude your direct testimony at this time?

A. Yes.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 1-R

Rebuttal Testimony of
Rebecca E. Hillery

Topics Addressed: **Overview of National Fuel's Rebuttal Case**
Management Performance
Affordability

Dated: May 12, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Rebecca E. Hillery. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. Did you previously submit testimony in this proceeding on behalf of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company")?

A. Yes. I submitted my direct testimony, National Fuel Statement No. 1, on January 28, 2026.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your rebuttal testimony.

A. My rebuttal testimony provides an overview of the Company's rebuttal case, responds generally to recommendations and positions offered in direct testimony by the Bureau of Investigation and Enforcement ("I&E"), Office of Consumer Advocate ("OCA"), Office of Small Business Advocate ("OSBA"), Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), and Pennsylvania Weatherization Providers Task Force ("PWPTF"). My testimony also responds specifically to certain portions of direct testimony offered by OCA witness Michael Deupree (OCA Statement No. 1), CAUSE-PA witness Harry S. Geller, Esq (CAUSE-PA Statement No. 1), and PWPTF witness Jennifer Warabak (PWPTF Statement No. 1), which recommend material changes to the Company's proposed rate increase.

Q. Are you sponsoring any exhibits with your rebuttal testimony?

A. No.

III. OVERVIEW OF NATIONAL FUEL'S REBUTTAL CASE

Q. Please provide an overview of the Company's rebuttal case.

A. The Company's rebuttal testimony provides a response to each of the individual issues raised by opposing parties. Unless otherwise noted, the Company submits that the adjustments and recommendations proposed by the opposing parties should be rejected because they are unreasonable, depart from established ratemaking practices, and/or are contrary to long-standing Pennsylvania Public Utility Commission ("Commission") practice. In some limited instances, the Company has agreed with an opposing party's position and has reflected the impact in its revised revenue requirement.

Q. Please describe the positions taken by opposing parties in response to National Fuel's proposed revenue increase.

A. I&E, OCA and OSBA are all recommending a significant decrease in the revenue requirement initially proposed by the Company. The Company proposed and supported a revenue requirement of $19.7 million in its initial direct testimony. I&E is recommending that the revenue requirement should be $11.1 million. OCA has recommended a revised revenue requirement between $4.1 million and $4.5 million. Finally, OSBA did not recommend a revised revenue requirement but did propose several different adjustments that would result in a revenue requirement of $10.9 million.

Q. Are the revenue requirement amounts proposed by I&E, OCA and OSBA reasonable?

A. No. The revenue requirements proposed by I&E, OCA and OSBA would fail to adequately cover the Company's rising cost of providing safe and reliable service and not allow the Company an opportunity to earn a fair and reasonable rate of return. As discussed in the Company's modified Long-Term Infrastructure Improvement Plan ("LTIIP") filed on December 11, 2025 at Docket No. P-2022-3034957, and approved by the Commission on March 26, 2026, the Company is committed to certain Leak Prone Pipe ("LPP") replacements throughout the lifetime of its LTIIP. The Company has met its mileage targets each year with less than 4% variance. The cost of LPP replacement has increased significantly for reasons outside of the Company's control including, but not limited to, increased restoration costs, material costs, contractor costs, permitting costs, and overall inflationary increases from the COVID pandemic. Additionally, the Company continues to manage inflationary pressures and challenges in attracting and retaining talent at all levels of the organization, which has led to increasing labor, benefits and other costs to operate the business. The limited rate increases proposed by I&E, OCA and OSBA would impact the Company's ability to make necessary investments in gas infrastructure, human resources, systems, and other initiatives necessary to provide safe and reliable service and strong customer service experience throughout its service territory.

Q. How did I&E, OCA and OSBA arrive at their lower revenue requirement recommendations?

A. The revenue requirement adjustments offered by the intervening parties are driven by the following: unreasonable adjustments to the return on equity (I&E, OCA, and OSBA); improper adjustments to the Company's capital structure (OCA and I&E); inappropriate exclusion of certain Operations & Maintenance ("O&M") expenses, including costs related to compensation programs that drive proven affordability and reliability benefits for ratepayers (OCA, I&E and OSBA); and an unjustified proposal to reduce depreciation expense by changing a method that the Company has used consistently for several decades, among many other adjustments. Many of the recommendations presented by the intervening parties are unfounded and deviate significantly from the standard ratemaking principles and practices that have historically been applied by the Commission. All the recommendations presented by the intervening parties are fully addressed by the Company's witnesses in their rebuttal testimony.

Q. What is the Company's updated revenue requirement offered in connection with its rebuttal case?

A. As outlined by Company witness Donald N. Koch (National Fuel Statement No. 2-R), the Company's updated revenue requirement increase is $18,475,00, exclusive of the Energy Efficiency Rider and OPEB surcredit revenues. This represents a reduction of $1,205,000 from the Company's originally filed revenue requirement increase of $19,680,000.

Q. What are the drivers of the decrease in the Company's requested revenue requirement?

A. The primary driver of the $1.2 million decrease in the Company's revenue requirement is a reduction in the requested rate of return. The Company has voluntarily dropped its request for a 25 basis point management efficiency adjustment to the return on equity ("ROE"). The Company also made minor adjustments to working capital items that reduced rate base and had a modest impact on revenue requirement.

Q. Why is the Company no longer pursuing the management efficiency adjustment?

A. While the Company continues to support the applicability of a management efficiency adjustment given its strong and demonstrated track record of providing safe and reliable service at the lowest rates in the Commonwealth, the Company recognizes the importance of customer affordability in the current economic environment. As such, the Company has voluntarily chosen to forgo its request for the adjustment to the ROE in this proceeding.

Q. Is the Company's updated revenue requirement reasonable?

A. Yes. The Company's updated revenue requirement is reasonable and represents the financial support necessary to continue providing safe and reliable service at rates that are affordable and sustainable. The rate design to recover the updated revenue requirement accurately reflects the Company's cost of service, enables the Company to make the necessary investments in its system and operations in a cost-effective manner, and provides an opportunity to earn a fair rate of return.

Q. How has the Company demonstrated that the updated revenue requirement, and the system investments that it supports, are necessary and produce tangible benefits for ratepayers?

A. As supported throughout the Company's initial direct testimony and reinforced in rebuttal testimony, the Company's requested rate increase is necessary to support the continued investment and execution of its LTIIP, which was reauthorized by the Commission on March 26, 2026. National Fuel's LTIIP is a measured plan to accelerate pipeline replacement and system modernization at a pace that appropriately balances safety risks, system reliability, and ratepayer affordability. In conjunction with the PUC's approval in March, Chairman Stephen M. DeFrank issued a statement acknowledging National Fuel's performance and emphasizing the importance of the LTIIP in driving value for ratepayers. Chairman DeFrank's statement noted,

> "I find NFG's performance in meeting pipeline replacement targets, despite increased costs, to be commendable and worthy of recognition.
>
> "Unfortunately, increased costs are now beginning to impact NFG's ability meet replacement goals… Given these facts, approval of NFG's Petition is necessary to ensure leak prone pipe replacement is not compromised"

Q. Are there any positions offered by opposing parties that you wish to address in your overview of the Company's rebuttal testimony?

A. Yes. The opposing parties had somewhat differing positions on the Company's proposal to make the Weather Normalization Adjustment ("WNA") pilot a permanent mechanism. The proposals regarding the WNA included recommendations to increase the deadband

from 3% to 5%, limit the months that it can be applied to, and discontinue the mechanism altogether. Opposing parties proposed to disallow certain compensation costs, including stock based and executive incentive compensation. Opposing parties also express multiple concerns related to affordability and general macroeconomic trends that I will discuss below. Last, OCA witness Mr. Michael Deupree (OCA Statement No. 1) made a statement about macroeconomic concerns and National Fuel Gas Company's ("Parent Company") stock price that I'd like to address.

Q. Respond to the opposing parties' positions on the WNA.

A. The WNA is a symmetrical mechanism, which balances weather-driven financial risk equally for both ratepayers and the Company, and is designed to recover or refund revenues that are lost or gained due to actual weather deviating from the normal historical average. The Company's fixed and volumetric delivery rates, which are designed to recover the cost of service authorized by the Commission, are based on an assumption of what is defined as normal weather, or a baseline of expected customer usage under normal weather conditions. When actual weather is warmer than normal, customers' actual usage is less than that baseline, resulting in lower volumetric delivery charges for customers (i.e., lower bills) and lower revenues for the Company. When actual weather is colder than normal, customers' actual usage increases above the baseline, resulting in higher volumetric delivery charges for customers (i.e., higher bills) and higher revenues for the Company. Opposing parties' claims that the WNA is not symmetrical because months with surcharges have exceeded months with refunds do not understand the mechanism and completely ignore the other side of the WNA equation, specifically that

customers benefit from lower volumetric charges when weather is warmer than normal and are harmed by higher volumetric charges when weather is colder than normal. Whether or not weather is more often warmer than normal than it is colder than normal is irrelevant. In any scenario where weather deviates from the conditions on which delivery rates were designed and the baseline of revenues were authorized, the WNA is effectively designed to hold both ratepayers and the Company harmless, equally.

Given the effectiveness and symmetrical nature of the WNA design, recommendations from opposing parties to expand the deadband to 5%, if adopted, would increase the risk on both ratepayers and the Company unnecessarily. In a colder-than-normal winter like the season that just ended, increasing the deadband to 5% would have a negative impact on customers because it would result in less surcredits for customers to offset the impact of higher-than-normal usage in their monthly bills. Table 1 below has been updated through April 2026 and demonstrates the value to the customer in a colder-than-normal season like the winter of 2025-2026. The positive amounts represent recoveries by the Company, and the negative amounts demonstrate reductions to customer bills.

Table 1: Heating Season by year

	2023-2024	2024-2025	2025-2026
OCT	$ 112,758	$ 347,315	$ 291,162
NOV	179,872	1,051,095	(298,215)
DEC	314,620	109,846	(1,198,284)
JAN	1,010,020	(240,353)	(464,332)
FEB	1,237,993	(310,213)	(2,015,891)
MAR	2,361,861	580,910	1,129,912
APR	702,191	608,196	1,381,702 *
MAY	1,078,972	48,505	Not Available
Adjustments	(78,094)	(8,520)	
Total by Season	$ 6,920,194	$ 2,186,781	$ (1,173,946)

*Estimated

Additionally, opposing parties' recommendations to remove certain months from the WNA also increase risk on ratepayers and the Company unnecessarily. National Fuel's service territory in northwest Pennsylvania, along the shores of Lake Erie, experiences longer winters and colder autumn and spring seasons than other utilities in the Commonwealth. As a result, the Company sees material heating demand from residential and small commercial customers starting in October and extending through May. As such, the WNA period of October to May is appropriate for National Fuel and its customers.

To conclude, the Company reaffirms that its WNA mechanism has worked as designed since its implementation as a pilot following the 2022 case and continues to produce tangible benefits for ratepayers and the Company in a way that mitigates risk equally. The Company remains opposed to the positions of parties that seek to change the design or application of the WNA. Further discussion of the WNA appears in the rebuttal testimony of Company witness John D. Taylor (National Fuel Statement No. 19-R).

Q. Please respond to the opposing parties' position to disallow certain compensation costs.

A. Opposing parties are seeking to disallow certain compensation expenses, including costs relating to executive incentive and stock-based compensation programs, because they assert such costs only benefit shareholders. As discussed extensively in the rebuttal testimony of Company witness Mike Weidner (Statement No. 5-R), the Company's inventive and stock-based compensation programs play a critical role in enhancing the Company's ability to provide safe, reliable and affordable service. The programs are part of a full compensation approach designed to attract a skilled work force in a competitive labor market, increase retention of key management personnel, encourage development of talent and institutional knowledge, and incentivize responsible financial management over the long-term. An experienced and properly incentivized workforce and management team drives tangible reliability and affordability benefits for ratepayers, as evidenced by the Company's strong track record as the low-cost natural gas utility provider in Pennsylvania.

Q. Please address Mr. Deupree's statement about the Parent Company's stock price.

A. It is not appropriate to compare the increase requested in this case to the Parent Company's stock price for several reasons. First, jurisdictional ratemaking must be based on utility-specific risk. The Commission sets a return for the utility, not for the Parent Company or its shareholders. Second, the stock price reflects consolidated operations (regulated and non-regulated), different jurisdictions and different risk profiles. The Parent Company's stock price is materially influenced by perceived risk and performance

of non-Pennsylvania and non-regulated operations. Last, Mr. Deupree's statement is contrary to longstanding ratemaking principles and precedents, which require the Commission to set prospective rates based on known and measurable utility costs and risks.

IV. AFFORDABILITY

Q. Please provide an overview of the affordability concerns in the case.

A. Several of the other parties had concerns about affordability and how National Fuel's increase would impact customers. Specifically, CAUSE-PA and PWPTF stated concerns about the rate increase and its impact on low-income customers. OCA (OCA Statement No. 1) stated concerns about general inflationary pressures, particularly on low-income households, and the conflict in the Persian Gulf.

Q. How does National Fuel view the issue of affordability in the context of this rate proceeding?

A. While current events and the timing and extent of the Company's proposed increase in this proceeding are important, affordability should also be evaluated through a long-term lens. True and lasting affordability occurs when customers receive safe, reliable service at the lowest reasonable cost over time and through economic cycles, supported by a utility that operates efficiently, invests prudently, and manages its finances responsibly. A narrow focus that inappropriately seeks to minimize near-term impacts, without regard to

long-term system conditions, financial sustainability, and management performance, ultimately undermines affordability rather than protects it.

Q. What is National Fuel's long-term approach to affordability?

A. Achieving real and durable affordability for ratepayers does not happen by accident. National Fuel's long-term approach to affordability is focused on the following:

- A culture of cost control and operational excellence that is deeply embedded in the organization and continuously reinforced by executive leadership and management;
- Disciplined, risk-based capital deployment and efficient investment in the distribution system that is aligned with the Company's Commission- approved LTIIP; and
- Prudent financial management that enhances financial stability and allows the Company to maintain strong credit and access to capital at a reasonable cost.

Q. How has National Fuel's long-term performance validated the effectiveness of its long-term approach to affordability?

National Fuel's proven track record of being a low-cost utility provider reflects a consistent focus over many decades on disciplined management. The durable, positive impacts on energy affordability, which drive significant value for our ratepayers and the local economy in northwest Pennsylvania, are evident in several ways.

- **Lowest gas delivery rates and total bills in Pennsylvania:** As discussed in my direct testimony (National Fuel Statement No. 1), National Fuel residential

customers currently pay the lowest total average bill and total average delivery rates in the Commonwealth. This was reaffirmed in the Commission's 2026 Rate Comparison report issued on April 15, 2026. The results of this report are consistent with last year's report referenced in my direct testimony. And even after implementation of the requested rate increase, National Fuel will continue to have the lowest delivery rates and average bills in the Commonwealth.

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- **Lowest rate base per customer in Pennsylvania:** Also discussed in my direct testimony, the amount of rate base that National Fuel has invested per customer to build out and modernize its 5,000-mile distribution system is the lowest in the Commonwealth, approximately 50% to 75% lower than every other Pennsylvania peer gas utility. This drives enormous affordability benefits for National Fuel ratepayers as it results in significantly lower revenue requirements needed for the return on and of the capital invested in rate base relative to other gas utilities. These benefits accrue directly to ratepayers and compound over time.
- **A history of infrequent rate cases:** The Company has come to the PUC only three times over the last 20 years requesting a base delivery rate increase. As a result, when viewed over near-, medium- and longer-term time horizons, the compound annual growth rate of the average residential delivery rate and total bill that would result from the Company's proposed rate increase is at or well below the general rate of inflation. The avoidance of frequent rate increases also provides ratepayers with greater stability and certainty in their monthly energy

costs over long stretches of time, attributes that are critical factors for affordability.

- **Stewardship of long-term ratepayer obligations, including post-retirement benefits:** National Fuel has responsibly managed its employee pension and other post-retirement benefits ("OPEB") costs and prudently invested the funds provided by ratepayers over many decades to fund these long-term obligations. As a result, the Company no longer requires ratepayer funding, which has reduced revenue requirements, and has been able to return funds previously collected from ratepayers to mitigate rate increases and provide bill relief. For example, since 2021, National Fuel has refunded $50 million back to ratepayers and was able to reduce its rates annually by $7.7 million to reflect the elimination of OPEB costs.

Q. How affordable is natural gas service relative to other energy alternatives available to customers?

A. Natural gas remains one of the most affordable energy sources available to consumers in northwest Pennsylvania, particularly when compared to electricity for space and water heating. Over the past two decades, natural gas has demonstrated a durable cost-competitive advantage due to abundant supply, efficient production, and stable delivery rates. Maintaining access to this low-cost energy source provides substantial ongoing value to ratepayers, especially low- and moderate-income households.

Q. Why is continued investment in the natural gas system critical to maintaining that affordability advantage?

A. The affordability of natural gas depends on a delivery system that is safe, reliable and capable of meeting customer demand under all conditions. The Company's proposed revenue requirement supports the level of investment necessary to ensure that ratepayers can continue to rely on natural gas as a dependable, low-cost energy option. Underinvestment in the delivery system increases risk and ultimately raises long-term costs for ratepayers.

Q. How do the Company's requested ROE and capital structure support sustainable affordability and drive value for ratepayers?

A. The requested return on equity and capital structure, which are further supported in the rebuttal testimonies of Josh Nowak (Statement No. 10-R) and Jim Welch (Statement 11-R), are reasonable and designed to support National Fuel's ability to continue operating as a low-cost provider while making the necessary investments in the system to enhance safety and reliability. They reflect market-based standards and Commission precedent and allow the Company to access capital at the lowest reasonable overall cost. The recommendations from I&E, OCA and OSBA to reduce the return on equity and equity ratio to inappropriate levels may produce short-term rate suppression in this instance but would ultimately impair the Company's ability to attract capital and increase costs over the long-term by raising financial risk and increasing the cost of capital.

Q. Are there any additional measures the Company is taking to address affordability in its updated revenue requirement?

A. Yes. As noted above, the Company is reducing the ROE requested in the case by removing the 25 basis points originally requested to recognize management's exceptional performance in safety, quality customer service, and affordability and operational efficiencies, among others. While the Company maintains this additional ROE is fair and reasonable, the Company has agreed to reduce the revenue requirement by $1.2 million to address affordability concerns.

Additionally, the Company reaffirms its proposal to implement a one-time bill credit of $30 for verified low-income customers and reinstate the Rider I OPEB Surcredit for all customers which would refund a total of $7.2 million in the FPFTY. This would offset a significant portion, approximately 39%, of the updated revenue requirement. In CAUSE-PA's direct testimony, Mr. Geller, notes that the surcredit being proposed in this case is to return ratepayer dollars that were previously collected. While it is true that this is a return of ratepayer dollars, it is important to note that this was made possible through prudent management of medical costs, the OPEB obligation and the assets set aside for that obligation, as well as key actions taken by management to enable the availability of grantor trust assets.

National Fuel remains committed to its prudent management of its business as discussed above and recognizes the concerns in today's market. However, the increases sought in this case are primarily driven by investments in the rate base and human capital necessary to sustain the Company's ability to operate in a safe and reliable manner for its customers.

Q. Does this conclude your rebuttal testimony at this time?

A. Yes.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 1-SR

Surrebuttal Testimony of Rebecca E. Hillery

Topics Addressed: **Affordability**

Dated: May 27, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Rebecca E. Hillery. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. Did you previously submit testimony in this proceeding on behalf of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company")?

A. Yes. I submitted direct testimony, National Fuel Statement No. 1, on January 28, 2026, and rebuttal testimony, National Fuel Gas Statement No. 1-R, on May 12, 2026.

Q. Please describe the purpose of your surrebuttal testimony.

A. My surrebuttal testimony responds to the statements made by Office of Consumer Advocate ("OCA") witness Michael Deupree regarding energy affordability and energy burden levels.

Q. Are you sponsoring any exhibits with your surrebuttal testimony?

A. No.

Q. Does the Company's surrebuttal testimony address all topics and issues raised by the opposing parties in rebuttal testimony?

A. No. My testimony is the only surrebuttal testimony submitted on behalf of the Company. The Company did not readdress any topic or issue that was already addressed in rebuttal testimony. The Company's silence on any particular topic or issue raised in rebuttal

testimony by the opposing parties does not mean that the Company agrees with the position of the opposing parties. The Company refers the opposing parties to the applicable rebuttal testimony for the Company's response and position on those topics and issues.

Q. Please summarize OCA witness Deupree's rebuttal testimony regarding affordability and energy burdens.

A. Mr. Deupree restated his position from direct testimony that I responded to in rebuttal (National Fuel Statement No. 1-R) and further discusses definitions for energy affordability and energy burdens. He references the Commission-established maximum energy burden of 6% for natural gas heating customers relative to the Federal Poverty Income Guidelines ("FPIG") and compares the proposed rate increase to those guidelines.

Q. Please respond to this testimony.

A. I disagree with the conclusions that OCA witness Deupree draws from the data presented in Figure 1 on page 4 of his rebuttal testimony. Mr. Deupree's data shows that under the Company's proposed rates, households with income levels at 100% of the FPIG will remain below the 6% energy burden he cites as an "unaffordable" threshold. These customers are also eligible for enrollment in the Company's Customer Assistance Program ("CAP"), which is available to customers with household incomes at or below 150% of the FPIG. For customers enrolled in CAP at 100% of the FPIG, maximum monthly payments are capped at 6% of their household income. Mr. Deupree also does not consider the impact of CAP for those customers at 50% of the FPIG. Maximum

monthly payments for customers enrolled in CAP with income levels at or below 50% of the FPIG are capped at 4% of their household income. The availability of CAP for these customers is a significant factor that should be considered when determining the overall affordability of the Company's proposed rates. As discussed in the testimony of Company witness Matthew W. Stoops, Jr. (National Fuel Statement No. 17 and 17-R), the Company has multiple methods in place to identify low-income customers who may be eligible for CAP and has made improvements to streamline the enrollment process and increase enrollments. In addition, the Company's planned OPEB credit will directly benefit low-income customers. Finally, as detailed in my direct and rebuttal testimony, National Fuel has demonstrated its ongoing commitment to affordability and, under the Company's proposed rates, National Fuel will continue to have the lowest gas delivery rates and total bills in Pennsylvania.

Q. Does this conclude your surrebuttal testimony at this time?

A. Yes.

NATIONAL FUEL STATEMENT NO. 2

DONALD N. KOCH

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 2

Direct Testimony of
Donald N. Koch

Topics Addressed: **Revenue Requirement**
Operating Revenues and Expenses

Dated: January 28, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Donald N. Koch. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. By whom and in what capacity are you employed?

A. I am employed by National Fuel Gas Distribution Corporation ("NFGDC") as a Lead Rate Analyst in the Rates and Regulatory Affairs department. NFGDC is comprised of a Pennsylvania Division ("National Fuel" or "Company") and a New York Division ("National Fuel – NY").

Q. Please provide your educational background.

A. I received a Bachelor of Science degree in Business Administration from SUNY Geneseo in May 2004. I received a Master of Business Administration degree with a specialization in Accounting/Finance from St. Bonaventure University in December 2009.

Q. Please provide your professional experience.

A. Prior to joining NFGDC, I worked in banking for 11 years at M&T Bank specializing in various compliance and financial roles. In June 2015, I was hired by the Company as a Rate Analyst II in the Rates and Regulatory Affairs department. In February 2020, I was promoted to the position of Rate Analyst III. In February 2023, I was promoted to my current position of Lead Rate Analyst.

Q. Have you previously testified in other proceedings before the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission") or any other state or federal agency?

A. Yes, I have testified before this Commission on behalf of NFGDC in numerous Section 1307(f) Purchased Gas Cost ("PGC") proceedings. I testified in the Company's last base rate case proceeding (Docket No. R-2022-3035730). I also have testified in the Other Post Employment Benefit ("OPEB") refund case (Docket No. R-2021-3027406), the Distribution System Improvement Charge Petition ("DSIC") (Docket No. P-2022-3034957), and the Joint Application for acquisition of North East Heat & Light Company ("NEHL Acquisition") (Docket No. A -2025-3057864). I have testified before the New York State Public Service Commission ("NYPSC") on behalf of National Fuel – NY in a base rate case proceeding (Docket 16-G-0257). My testimony in that case before the NYPSC covered net plant and rate base.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your testimony.

A. The purpose of my testimony is to present the Company's proposed revenue requirement based on the twelve months (ending October 31, 2027) of operating costs and revenues, as adjusted. First, I provide an overview of the Company's primary accounting exhibits for the historic test year ended September 30, 2025 ("HTY"), the future test year ending September 30, 2026 ("FTY"), and the fully projected future test year ending October 31,

2027 ("FPFTY"). Second, I describe the Company's ratemaking presentation for the FPFTY and certain *pro forma* adjustments.

Q. Are you sponsoring any exhibits or filing requirements in this proceeding?

A. I am sponsoring National Fuel Exhibit A (FPFTY), National Fuel Exhibit A (FTY), and National Fuel Exhibit A (HTY). National Fuel Exhibit A is further supported by additional Company witnesses, which include:

- Anthony T. Formato (National Fuel Statement No. 3), addressing operating and maintenance ("O&M") expenses;
- Monika M. Duszenko (National Fuel Statement No. 6), addressing the Company's rate base;
- Joshua C. Nowak (National Fuel Statement No. 10), addressing fair rate of return;
- Erica L. Forcucci (National Fuel Statement No. 12), addressing taxes; and
- Courtney T. Mann (National Fuel Statement No. 14), addressing operating revenues.

III. OVERVIEW OF PRIMARY ACCOUNTING EXHIBIT

Q. Please describe the primary accounting exhibits used to support National Fuel's claims in this proceeding.

A. National Fuel Exhibit A (FPFTY) demonstrates the Company's revenue requirement for the FPFTY ending October 31, 2027. National Fuel Exhibit A includes primary accounting exhibits, rate base claims, O&M expenses, taxes and *pro forma* adjustments. National Fuel Exhibit A (FTY) provides the same information for the FTY ending September 30, 2026. National Fuel Exhibit A (HTY) provides the per book information

for the HTY ending September 30, 2025, with ratemaking and certain *pro forma* adjustments.

Q. Please further describe the primary accounting exhibits used to support National Fuel's claims in this proceeding.

A. National Fuel Exhibit A for all test periods is separated into several sections. Section A provides the income statement, or measure of value at present rates and at proposed rates, which includes the proposed revenue requirement. Section B includes basic accounting exhibits, rate of return, and cost of debt exhibits. Section C includes exhibits that provide net plant in service, rate base, and various exhibits utilized by the Company in its lead lag study. Section D details *pro forma* revenue and expense adjustments, including rate making tax calculations. National Fuel Exhibit A is intended to aid in compliance with all Commission filing requirement regulations.

Q. How was the data sourced for the National Fuel Exhibit A primary accounting exhibits?

A. The HTY per book data was sourced from the books and records of the Company. Annualizations or ratemaking adjustments were then applied to the per book data. For the projected periods of the FTY and FPFTY, Company witnesses prepared various analyses and projections based upon Company budgets, ratemaking adjustments, and other Company specific practices. Please refer to the Index of Direct Testimony for a listing of specific Company witnesses and areas of expertise covered. Descriptions and further detail can be found in the direct testimony of each witness.

IV. REVENUE REQUIREMENT FOR THE FPFTY

Q. How was the revenue requirement for the FPFTY established?

A. The summary level revenue requirement is presented on Schedule A-1, column 4 within National Fuel Exhibit A (FPFTY). Lines 1 – 9 summarize total rate base. Lines 10 – 19 summarize operating revenues. Finally, lines 21 – 28 present the requested revenue increase.

Q. What is the overall requested revenue increase?

A. Revenue requirement is the total allowable revenues – the sum of current revenues and the increase. The overall requested revenue increase is $19.7 million. This amount represents a 14.1% increase to delivery revenues and a 7.4% increase to total revenues.

Q. How were revenues at present rates determined?

A. Please refer to the Direct Testimony of Courtney T. Mann, National Fuel Statement No. 14 for a discussion of revenue forecast and calculations. Revenue calculations were prepared by or under the supervision of Ms. Mann.

Q. Please describe the O&M expense claims presented.

A. O&M expense projections were prepared by or under the supervision of Anthony Formato. Please refer to the direct testimony of Anthony Formato, National Fuel Statement No. 3 for a discussion of O&M expense projections and calculations.

Q. Does the Company budget O&M expense by Federal Energy Regulatory Commission ("FERC") account?

A. No. The Company does not budget O&M expenses by FERC account. The Company's O&M expenses are presented by budget item, or cost element.

Q. Did the Company present O&M expense by FERC account in National Fuel Exhibit A?

A. Yes. The Company presented O&M expense in National Fuel Exhibit A by FERC account for all three test periods. The Company used historic data as a basis for allocation to FERC accounts for the FTY and FPFTY periods by developing a percentage of each FERC account contained in each cost element. That percentage was then applied to the projected amount for each cost element to derive a FERC account balance.

Q. How were the Company's rate base items determined?

A. Please refer to the Direct Testimony of Monika M. Duszenko, National Fuel Statement No. 6, for a complete discussion on rate base projections and calculations. Rate base projections were prepared by or under the supervision of Ms. Duszenko.

Q. Please summarize the adjustments shown in Schedule D of National Fuel Exhibit A.

A. Schedule D of National Fuel Exhibit A consists of the following schedules:

- Schedule D-1: Summary of Revenues and Expenses with proposed revenue increase;
- Schedule D-2: Summary of Pro Forma Revenues and Expenses with proposed revenue increase;

- Schedule D-3: Summary of Pro Forma Adjustments;
- Schedule D-4: N/A to FPFTY;
- Schedule D-5: Revenue Summary;
- Schedule D-6: Rate Case Expense;
- Schedule D-7: Uncollectible Expense;
- Schedule D-8: Depreciation Expense;
- Schedule D-9: OTAX Summary;
- Schedule D-10: Payroll Tax Adjustment;
- Schedule D-11: Income Tax Calculation;
- Schedule D-12: Tax Depreciation;
- Schedule D-13: Gross Revenue Conversion Factor; and
- Schedule D-14: Regulatory Asset/Liability 3 Year Amortization Adjustment.

Q. Please summarize the amortization adjustments on Schedule D-14.

A. Schedule D-14 contains two regulatory deferral accounts that the Company is proposing to amortize over three years. The first is an amortization of a regulatory liability account relating to Medicare subsidy in the amount of $921,648, or the three-year amount of $307,216. Please refer to the Direct Testimony of Erica L Forcucci, National Fuel Statement No. 12, for more details. The second adjustment is an amortization of a regulatory asset account of the Tax Cuts and Jobs Act ("TCJA") surcredit in the amount of $242,147, or the three-year amount of $80,716. The Company over-refunded the TCJA surcredit to customers and has this regulatory asset remaining on its books.

Q. Have any of the potential impacts relating to the potential acquisition of NEHL been reflected in National Fuel Exhibit A (FPFTY)?

A. No. Due to the pending status of the proposed acquisition and the de minimis impact, no adjustments have been made to National Fuel Exhibit A (FPFTY) for any potential NEHL impacts at this time. Please refer to the Direct Testimony of Rebecca E. Hillery, National Fuel Statement No. 1, for a more in-depth discussion of the potential NEHL Acquisition.

Q. Does this conclude your direct testimony at this time?

A. Yes.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 2-R

Rebuttal Testimony of
Donald N. Koch

Topics Addressed: **Revenue Requirement**

Dated: May 12, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Donald N. Koch. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. Did you previously submit testimony in this proceeding on behalf of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company")?

A. Yes. I submitted my direct testimony, National Fuel Statement No. 2, on January 28, 2026.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your rebuttal testimony.

A. My rebuttal testimony provides an updated overall revenue requirement based upon adjustments made by the Company and limited adjustments presented by other statutory parties in direct testimony. I will also address certain adjustments and positions taken by other statutory parties in their direct testimony.

Q. Are you sponsoring any exhibits with your rebuttal testimony?

A. Yes. I am sponsoring National Fuel Exhibit A - FPFTY Rebuttal Update.

III. OVERALL REVENUE REQUIREMENT

Q. Please provide an overview of the other parties' revenue requirement adjustments.

A. I&E recommended a revenue requirement increase of $11,091,000, which represents a decrease of $8,589,000 from the Company's originally filed revenue requirement increase of $19,680,000.

OCA provided two recommended revenue requirement increases. The first recommendation utilized an alternative capital structure and return on equity ("ROE") and produced a revenue requirement increase of $4,069,000, which represents a decrease of $15,611,000 from the Company's originally filed revenue requirement increase of $19,680,000. The second recommendation utilized the Company's capital structure but an alternative ROE and produced a revenue requirement increase of $4,533,000, which represents a decrease of $15,147,000 from the Company's originally filed revenue requirement increase of $19,680,000.

OSBA did not recommend a specific revenue requirement amount. However, based upon the adjustments presented by OSBA witness Mr. Farr, the revenue requirement adjustments totaled $8,800,000 which would result in a revenue requirement increase of $10,880,000, compared to the Company's originally filed revenue requirement increase of $19,680,000.

Q. Does the Company agree with any of the revenue requirements proposed by the other parties?

A. No. As explained throughout this testimony and other rebuttal testimony provided by Company witnesses, the Company believes that a majority of adjustments proposed by the opposing parties are not reasonable and, therefore, should be rejected unless noted.

Q. Did the Company make any adjustments to its overall revenue requirement for rebuttal?

A. Yes. The Company did make several adjustments to its overall revenue requirement, which include adjustments to:

Rate Base – Includes adjustments to reduce Cash Working Capital, Customer Advances and CIAC amounts. Please refer to National Fuel Statement No. 6R - Rebuttal Testimony of Monika M. Duszenko for more detailed information regarding adjustments to rate base.

ROE – The ROE in the revenue requirement is now reflective of 11%, reduced from 11.25% due to the removal of the management performance adder. Please refer to National Fuel Statement No. 1R – Rebuttal Testimony of Rebecca E. Hillery and National Fuel Statement No. 10R – Rebuttal Testimony of Joshua C. Nowak for more detailed information regarding adjustments to ROE.

Q. Based upon the updates, what is the Company's overall revenue requirement?

A. The Company's updated revenue requirement increase is $18,475,000, exclusive of Energy Efficiency Pilot Program Rider and OPEB surcredit revenues, as reflected in National Fuel Exhibit A – FPFTY Rebuttal update. This represents a reduction of

$1,205,000 from the Company's originally filed revenue requirement increase of $19,680,000.

IV. CONCLUSION

Q. What is your overall recommendation regarding overall revenue requirement?

A. As outlined above, the Company has carefully reviewed the revenue requirement adjustments proposed by I&E, OCA, and OSBA. While each party has provided a rationale for their recommended changes, the Company maintains its position that the original revenue requirement filing accurately reflects its needs and obligations, except where noted. The Company respectfully requests that the Commission consider the evidence and arguments presented in support of its revenue requirement increase, and that any opposing adjustments be denied.

Q. Does this conclude your rebuttal testimony at this time?

A. Yes.

NATIONAL FUEL STATEMENT NO. 3

ANTHONY T. FORMATO

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 3

Direct Testimony of Anthony T. Formato

Topics Addressed: O&M Expense & Budget Process (Capital & O&M)

Dated: January 28, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Anthony T. Formato. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. By whom and in what capacity are you employed?

A. I am employed by National Fuel Gas Distribution Corporation ("NFGDC") as a Director of Finance. NFGDC is a wholly owned subsidiary of National Fuel Gas Company ("NFG").

Q. Please provide your educational background.

A. I received an undergraduate degree in Finance and Business Management from Canisius University in 2008. Additionally, I received a Master of Business Administration degree from the University at Buffalo in 2013.

Q. Please provide your professional experience.

A. I started my professional career with NFGDC in 2008 in the Finance department as a member of the Cash Management team, which provides the day-to-day treasury functions for NFG. From 2012-2013, I worked in the Internal Audit department as a Staff Auditor where I was responsible for controls testing as well as operational audits. I then moved over to become an Office Manager in Operations in 2014 at our Mineral Springs service center in Buffalo, NY, where I was responsible for the New York dispatch function, off-hours emergency calls & the New York Operations clerical staff. In 2017, I moved back

to the Finance department as an analyst and have held various positions within Finance since 2017, including my present role as a Finance Director with responsibility for the O&M and Capital Budgets as well as the Accounts Payable function.

Q. Have you previously testified in other proceedings before the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission") or any other state or federal agency?

A. Yes, I have previously testified before the PAPUC in Docket No. R-2022-3035730 and the New York Public Service Commission (Case 23-G-0627).

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your testimony.

A. I am providing testimony to support the revenue requirement proposed by NFGDC's Pennsylvania Division ("National Fuel" or the "Company") in this proceeding. My testimony is specific to operations and maintenance ("O&M") expense, with the exception of employee benefits, which are covered in the Direct Testimony of Michael Weidner (National Fuel Statement No. 5). Additionally, I will explain the Company's current O&M and capital budgeting process and detail the adjustments made to O&M expense for the historic test year ended September 30, 2025 ("HTY"), future test year ending September 30, 2026 ("FTY"), and the fully projected future test year ending October 31, 2027 ("FPFTY").

Q. Are you sponsoring any exhibits or filing requirements in this proceeding?

A. I am sponsoring National Fuel Exhibits ATF-1 through ATF-4, as well as a series of Regulation Filing Requirements and standard data requests.

III. BUDGET PROCESS

Q. Please explain National Fuel's O&M budget process.

A. O&M Budgets are prepared based on the Company's fiscal year ("FY") of October 1st through September 30th using a zero-based budgeting approach. Each department reviews its business needs for the upcoming year across each of the major budget items (cost elements) to determine exact needs. These budgets are developed in the spring, presented to the senior management team in the summer, and then finalized before the start of the next FY in October. Between the budget presentations and the start of the FY, senior management and department staff hold subsequent discussions to review new initiatives and spending trends. The senior management team then communicates any requested modifications to the proposed budgets, such that departments can make any necessary revisions and finalize their budget in advance of the start of the FY. Once the FY begins, monthly review of budget to actuals is performed. On a quarterly basis, departments are required to submit any expected known and measurable changes to the budgeted amounts for the remainder of the fiscal year.

Q. How is the budget information used in the requested revenue increase?

A. The actuals from the HTY (FY 2025) were the starting point for the O&M forecast used for both the FTY and the FPFTY. The approved Company budget for FY 2026 was used

as a reference for known and measurable adjustments that were made for the FTY and FPFTY figures.

Q. Please explain National Fuel's Capital budget process.

A. Each May, the Finance department solicits updated 5-year capital projections from department managers across the organization, such as Engineering, Operations, Information Technology ("IT"), Land, Fleet Management, and Corrosion. Spending is budgeted and tracked by Federal Energy Regulatory Commission ("FERC") plant account and activity type. Allocations by plant account and activity type are guided by regulatory requirements, system integrity and reliability, historical spending, expected new business, public improvement projects and corporate objectives. The Finance department aggregates this data and prepares an initial consolidated forecast that is reviewed with Engineering, Operations and Finance senior management. Modifications are made throughout the summer to the five-year forecast, and a preliminary one-year capital budget is signed off on by the Company president before the start of the fiscal year on October 1st. A final budget is then prepared, approximately one month later, which incorporates any final modifications such as spill-over spending from the prior fiscal year. On a monthly basis, actual additions are tracked relative to the approved budget and reviewed with Engineering and Finance senior management.

Q. How is the capital budget information used in this proceeding?

A. The five-year capital forecast shown in ROR-014, is the basis for the Company's plant additions used to calculate the FTY and FPFTY rate base values.

IV. O&M METHODOLOGY & ADJUSTMENTS

A. Labor Expense

Q. Explain the methodology used to develop the labor forecast presented in National Fuel Exhibit ATF-4.

A. Schedule 1 of the exhibit presents a summary of the Company's labor forecast, which is made up of labor from the Company (detailed on Schedule 2), as well as borrowed labor from affiliated companies, primarily NFGDC's New York Division ("National Fuel – NY") and National Fuel Gas Supply Corporation. Affiliated labor details are found in Schedule 3. The Company utilizes several shared services departments which charge expenses to each NFG subsidiary in accordance with the Company's accounting policies. Procedures are in place to direct charge subsidiaries where appropriate and utilize a Commission sanctioned allocation methodology to distribute shared common expenses to each subsidiary. This shared service approach allows the Company to operate with a lower overall headcount, thus reducing the cost burden to ratepayers. For each component of Company labor, current wages were annualized to normalize the HTY amount. In the case of union employees, contractual increases for the FTY and FPFTY were used. Refer to National Fuel Statement No. 4 (the Direct Testimony of Valerie L. Hawthorn Wagner) for further details on the union contracts. For supervisory and executive employees, a 4.75% annual increase was utilized, while a 4% annual increase was used for the Company's "excluded" and non-union hourly positions. Additionally, Ms. Hawthorn Wagner discusses one-time salary adjustments that were made in the amounts of $145,000 for salaried employees and $526,000 for the Company's non-union hourly staff. These adjustments are effective in January 2026. These increases are

supported by the Direct Testimony of Valerie Hawthorn Wagner (National Fuel Statement No. 4), which describes the Company's commitment to retaining and rewarding existing employees in the current labor market. In addition to annual increases, this figure is also designed to capture promotions which will occur throughout the FTY & FPFTY. Non-executive labor from affiliated companies was normalized using an average of the most recent nine months of FY25.

Q. What is the O&M percentage used in National Fuel Exhibit ATF-4?

A. An O&M percentage of 73.14% is used for the applicable Company labor on National Fuel Exhibit ATF-4, Schedule 2 (PAD Labor). The O&M percentage represents the amount of Company labor that stays with the home Company and is not charged out to an affiliated subsidiary or capitalized. This percentage is a three-year average based on the Company's most recent three fiscal years (FY 2023 through FY 2025). There is no O&M percentage used on the labor forecast for the borrowed labor from National Fuel – NY or the borrowed labor from other subsidiaries, as the starting point for these forecasts is already a net O&M figure.

Q. Is there incremental headcount assumed in the labor forecast for the FTY or FPFTY?

A. National Fuel Exhibit ATF-4, Schedule 5 lists the 23 new positions the Company plans to onboard over the FTY and FPFTY time periods as well as the Company's share of the labor expense for each role. There are no incremental positions assumed for the labor borrowed from affiliated companies except for three incremental Information Technology

("IT") positions which are included in the FTY and FPFTY. The Company's share of these three positions is shown in the IT line rather than in Labor due to the way IT expenses are recorded and then allocated to the various subsidiaries.

Q. Are there any retirements included in the labor forecast for the FTY or FPFTY?

A. As shown in RR-21, six retirements are forecasted. While it is assumed for the FTY and FPFTY that all six of these positions are filled, a downward adjustment to labor is shown in National Fuel Exhibit ATF-4, Schedule 2 to account for the fact that the replacements will be hired at a lower starting salary.

Q. How does the labor forecast address natural attrition and employment lag?

A. The Company addresses this topic in RR-21 by utilizing a three-year average headcount relative to budgeted headcount to calculate labor savings, which are then worked into the labor exhibit (National Fuel Exhibit ATF-4, Schedule 2) as savings on the "Forecasted Headcount Differential" line.

Q. What is included in the "Payroll not subject to wage increases" line shown on National Fuel Exhibit ATF-4, Schedule 2?

A. This line item includes components of payroll such as shift differential, meter reader and damage prevention incentives, tuition reimbursement, healthcare opt-outs, lump sum payouts, and car allowances. The value for this line item was held constant from the HTY for the FTY and FPFTY labor forecast.

Q. What does the "Variable Pay" line shown on National Fuel Exhibit ATF-4, Schedule 2 represent?

A. This line item represents the net O&M portion applicable to the Company of the Annual Cash Bonus Program referred to in the Direct Testimony of Valerie Hawthorn Wagner (National Fuel Statement No. 4). It includes the net O&M portion for the Company's employees as well as the applicable borrowed amounts from National Fuel – NY and other subsidiaries. The figure is based on 100% achievement and assumes wage growth of 4.75%, consistent with the Company's increase for salaried employees.

B. <u>Uncollectibles</u>

Q. Please explain the Company's write-off process.

A. The Company will write off an account typically three months after the due date of the final bill, which is generated once a customer's account is terminated for non-payment (collections). This represents a change from the Company's prior cases as the duration was shortened from twelve months to three months starting in January 2025. This change was made to better align the timing between recovery of uncollectible expense from customers and the actual write-offs themselves. The residential collection season runs each year from April to November, during which time field service representatives attempt to obtain payment or terminate service for non-payment. There is also a small amount of non-collection related write-offs, for matters such as bankruptcies and customer disputes that do not follow the 3-month cycle and are written off sooner.

Q. Historically, what approach has been utilized to determine the Uncollectibles Expense for a given year?

A. Historically, the Company has used an annual average write-off factor from the prior three years. This factor would be applied to the current year revenue forecast to arrive at the estimated Uncollectible Expense for the year.

Q. Please explain the methodology used to calculate the Uncollectibles Expense for the FTY and the FPFTY.

A. The Company has not been through a full year under the new shortened write-off timeline. As shown in National Fuel ATF-2, Schedule 5, the Company is using a three-year average write-off factor of write-offs from FY 2022 through FY 2024 compared to gross revenue from FY 2021 through FY 2023. This dynamic of staggering the write-offs to the revenue by one year is consistent with prior filings as it aligns with the prior 12-month write-off timeline. Per book write-offs and revenue for each of these time periods were adjusted for the impact of the OPEB bill credits that were in-place during these time periods which had the impact of lowering customer bills and subsequently resulting in lower write-offs. Revenues were adjusted by the amounts of the bill credits and per book write-offs were adjusted to simulate what write-offs would have been if the bill credits were not in place. To do so, the OPEB bill impact was multiplied by 1.56% which represents the Company's write-off factor in their prior rate proceeding. Finally, a management adjustment of 0.02% was applied to the write-off factor to account for the impact of higher projected write-offs as a result of increased customer bills. This adjusted three-year average of 1.55% is then multiplied by forecasted revenue to arrive at

the uncollectible expense for the FTY & FPFTY. This figure is further reduced to back out the three-year average of the Customer Assistance Program ("CAP") arrearage forgiveness portion. The 1.55% is consistent with the Company's prior case which utilized a 1.56% write-off factor.

C. <u>Other Adjustments</u>

Q. Explain the methodology used to develop the Outside Services adjustment that is shown in National Fuel Exhibit ATF-2, Schedule 1.

A. The starting point for this line item was HTY actuals. The forecast for the FTY was derived by adjusting out the amount of expense in the HTY associated with the CAP (as shown on National Fuel Exhibit ATF-2, Schedule 11), which the Company has brought in-house and is no longer using contracted labor for. Additional adjustments were made to increase mowing and close interval survey costs to levels above HTY amounts due to higher planned activity and to normalize restoration costs using a three-year average.

Q. Explain the methodology used to develop the Office Employee Expense adjustment that is shown in National Fuel Exhibit ATF-2, Schedule 2.

A. Embedded in the HTY actuals, which were the starting point for this calculation, was only one quarter's worth of Oracle Database Management System and Exadata licensing. As such, an adjustment was made to reflect a full year of the Company's applicable share of these costs. Additionally, the HTY amount was increased by 3.67%, which represents

the compound annual growth rate from FY 2023 to FY 2025 for this line item. This same 3.67% rate was also used to project the FPFTY expense.

Q. Explain the methodology used to develop the Research & Development adjustment that is shown in National Fuel Exhibit ATF-2, Schedule 3.

A. The Company develops a new research and development plan each year. As such, an adjustment was made as shown on the schedule to incorporate the full-year planned activity for the FTY and an adjustment was made for the difference between the HTY amount and the planned costs for the FTY. Further details on the Company's Research, Development and Demonstration program are contained in National Fuel Statement No. 18 (the Direct Testimony of Erik M. Solomon).

Q. Explain the methodology used to develop the Other Expense adjustment that is shown in National Fuel Exhibit ATF-2, Schedule 4.

A. As shown in National Fuel Exhibit ATF-1, Schedule 1, the starting point for this line item was the normalized HTY value of $809,203. This value was then adjusted to incorporate a three-year average (FY 2023 through FY 2025) of the Company's line hit collections. This adjustment was made due to the variability that exists in receiving reimbursements of line hit damages from external parties.

Q. Explain the methodology used to develop the Injuries & Damages adjustment that is shown in National Fuel Exhibit ATF-2, Schedule 6.

A. Due to the unpredictable nature of the expense associated with injuries and damages, a three-year average (FY 2023 through FY 2025) of actual expense was used to calculate the FTY expense for this line item.

Q. Explain the methodology used to develop the Postage adjustment that is shown in National Fuel Exhibit ATF-2, Schedule 7 & ATF-3, Schedule 2.

A. As shown in National Fuel Exhibit ATF-1, Schedule 1, the starting point for the FTY postage expense is the normalized HTY amount. At the beginning of calendar year 2023, the postage rate for a 1 oz. stamp was $0.60. As of the end of calendar year 2025, the same stamp is now $0.78. This increase represents a 3-year compound annual growth rate of 9.14%. The USPS continues to publicize continued future increases in postage rates and as such the Company used the 9.14% historical trend to project the FTY postage expense (ATF-2, Schedule 7) and FPFTY postage expense (ATF-3, Schedule 2).

Q. Explain the Company's current IT program.

A. The Company operates a centralized IT program that provides shared services across subsidiaries, with capabilities spanning program and project management, application development, infrastructure, end-user computing, quality assurance, service management and access management under a defined organizational structure. The program's priorities emphasize operational resilience, technology optimization, customer experience/self-service, strategic growth and innovation. The program is anchored by

initiatives such as software-defined wide area network deployment, phone system upgrades, Windows server lifecycle remediation and continued Enterprise Resource Planning software transformation and collaboration platform rollouts, all managed through a structured agile methodology.

Q. Explain the methodology used to develop the IT adjustment that is shown in National Fuel Exhibit ATF-2, Schedule 7 & ATF-3, Schedule 8 & ATF-3, Schedule 3.

A. The IT line represents the Company's share of internal IT labor/benefits and other expenses incurred in the operation of the IT department including software, software maintenance, database storage, hardware, consulting services and telecommunications. IT charges are accumulated in clearing accounts and are distributed monthly to the appropriate business unit. As such, the HTY value for this line item was adjusted for the Company's share of projected higher expense in three main buckets:

1) New Applications/Incremental Licensing – includes costs associated with net new products such as Perplexity and a Security Information and Event Management (SEIM) solution as well as incremental licensing for data backup solutions and Kloudgin (dispatch software). This will include incremental groups of employees utilizing the dispatch technology as well as the rollout of the mobile platform.
2) 3 New Hires – Company's share of planned new hires in the IT department:
    1. Application Architect
    2. Senior Application Architect
    3. Senior UX Designer

3) Annual wage increases for IT employees – consistent with the 4.75% annual increase in the labor schedule for Salaried employees

The Company's share of these three adjustments was added to the HTY value to arrive at the FTY amount. As shown in National Fuel Exhibit ATF-3, Schedule 3, the same annual labor increase (4.75%) shown above in number 3 was used as the basis for the adjustment for the FPFTY.

Q. Explain the Company's current cybersecurity program including the newly created security command center.

A. NFG maintains a comprehensive Information Security Program aligned with the National Institute of Standards and Technology's Cybersecurity Framework and the Transportation Security Administration Security Directive. This alignment ensures that the program meets industry standards and regulatory requirements for critical infrastructure protection. The program's mission is to safeguard the confidentiality, integrity, and availability of both IT and Operational Technology systems across the organization. The cybersecurity program is built on a risk-based approach that utilizes regular assessments to guide investment decisions and monitor the effectiveness of controls. It employs a layered defense strategy that combines administrative, technical, and physical safeguards to prevent unauthorized access and reduce exposure to cyber threats. To ensure resilience, the program includes a robust incident response framework supported by immutable backups, annual disaster recovery testing, and a business continuity plan designed to include ransomware scenarios. In recent years, NFG has strengthened its cybersecurity posture by enhancing the vulnerability management

program, deploying a data security platform to protect sensitive information across on-premises, cloud, and software as a service environments, and formalizing third-party risk governance throughout the vendor lifecycle. The Company also established a 24x7 command center for continuous monitoring, significantly improving detection and response capabilities for both physical and cybersecurity threats, while also tracking system uptime and availability to enable immediate action when issues arise.

Q. Explain the methodology used to develop the Command Center/Cyber adjustment that is shown in National Fuel Exhibit ATF-2, Schedule 9 & ATF-3, Schedule 4.

A. This line item represents the Company's share of NFG's consolidated cybersecurity and security command center. It is inclusive of both labor related costs as well as third-party subscriptions and licenses. NFG began staffing for the security command center in the HTY, so an adjustment was made to account for the Company's share of a full year of labor and benefit expense. As this line also includes the Company's share of labor and benefit expense associated with cybersecurity, an additional adjustment was made to increase the HTY amount of labor and benefits by 4.75%, consistent with the Company's annual increase for salaried employees. These two adjustments are shown on National Fuel Exhibit ATF-2, Schedule 9 and are the basis for the FTY adjustment. The FPFTY adjustment is shown on National Fuel Exhibit ATF-3, Schedule 4 and incorporates that same 4.75% annual increase on the labor and benefit base established in the FTY for the Company's share of cybersecurity and security command center personnel.

Q. How are rate case expenses presented in the O&M exhibits?

A. Projected total rate case O&M expense is shown in National Fuel Exhibit ATF-2, Schedule 10. These costs are normalized over three years such that one-third of the projected rate case expense is included in the O&M projection for the FTY and the FPFTY. A three-year period was chosen as it aligns with the time between the Company's prior case and this case.

Q. Explain why vehicle depreciation costs were removed from the Transportation line item.

A. These costs are being excluded from O&M as they are being shown in this case as depreciation expense. This cost represents the depreciation expense associated with the Company's transportation and construction equipment.

Q. Explain why CAP related costs were removed from O&M.

A. As stated in the Direct Testimony of Donald Koch (National Fuel Statement No. 2), the Company recovers CAP related costs through Rider F rather than as part of base rates. As such, CAP related components were removed from O&M, the largest of which being uncollectible expense, as shown in National Fuel Exhibit ATF-2, Schedule 11.

Q. Explain the methodology used to develop the Advertising adjustment that is shown in National Fuel Exhibit ATF-2, Schedule 12.

A. An adjustment of $26,000 was made to reflect program costs for the FTY that are projected to be in excess of the HTY amounts. The same FTY total advertising amount of $787,275 was also used for the FPFTY.

Q. Explain the remaining FTY and FPFTY adjustments shown in National Fuel Exhibit ATF-1, Schedule 1.

A. In addition to the specific adjustments mentioned in the above testimony, the compound annual growth rate from FY 2023 to FY 2025 was applied to the following line items:

- Rents: 5.35%
- Transportation: 6.58%
- Regulatory Assessment: 14.08%
- Other Insurance: 9.83%
- UNICAP: 11.21%

For the Materials line item, the HTY amount was increased by 5.28% to arrive at the FTY amount. The FTY amount was further increased by 5.28% for the FPFTY. The 5.28% represents the year over year change in this line item which is being impacted by tariffs and inflationary pressures. Additionally, as mentioned in National Fuel Statement No. 20 (the Direct Testimony of Daniel J. Czechowicz), the HTY utilities amount was increased by $45,000 for the FTY to account for additional telemetering expenses. Finally, as mentioned in National Fuel Statement No. 18 (the Direct Testimony of Erik M. Solomon), the Company is proposing to lower the Delta Fund allowance to $300,000 for the FPFTY. This line item is shown as GTI on National Fuel Exhibit ATF-1, Schedule 1.

Q. Does this conclude your direct testimony at this time?

A. Yes.

NATIONAL FUEL EXHIBIT ATF-1

O&M EXPENSE SUMMARY

Pennsylvania Distribution O&M Expense

	Per Books TME 9/30/25	Normalize Benefits	Re-class AAA	Re-class Other Exp. To OEE	Re-class Other Exp. To Potsage	Re-class Clearing to Cyber	Remove Vehicle Depr.	Remove CAP Costs	Annualize Labor	Normalized TME 9/30/25	Schedule Adj.	FTY TME 9/30/26	Schedule Adj.	FPFTY TME 10/31/27
Net Labor	34,569,322								529,856	35,099,178	2,798,508	37,897,686	2,694,369	40,592,056
Material	1,477,041									1,477,041	78,023	1,555,065	82,145	1,637,210
Rents	1,315,632									1,315,632	70,407	1,386,039	74,175	1,460,214
Transportation	3,874,753						(2,404,146)			1,470,607	96,775	1,567,382	103,144	1,670,525
Utilities	923,765							(143)		923,622	45,000	968,622		968,622
Outside Services	3,512,725							(95,755)		3,416,970	358,901	3,775,871		3,775,871
Gas Purchases	(2,380)									(2,380)		(2,380)		(2,380)
Equipment Purchases	967									967		967		967
Employee Benefits	6,497,279	1,588,661								8,085,939	719,988	8,805,928	691,720	9,497,648
Office - Employee Expenses	1,556,889			199,516				(2,849)		1,753,556	179,533	1,933,090	70,958	2,004,048
Advertising - Sales	761,275									761,275	26,000	787,275		787,275
Research/Development	39,697									39,697	136,523	176,220		176,220
Dues and Memberships	234,266									234,266		234,266		234,266
Other Expense	2,196,801			(199,516)	(1,188,082)					809,203	155,892	965,096		965,096
Revenue Income	(421,718)									(421,718)		(421,718)		(421,718)
Uncollectibles	4,619,000		(243,149)					(914,078)		3,461,774	(207,363)	3,254,411	111,940	3,366,351
Regulatory Assessment	954,163									954,163	134,349	1,088,512	153,266	1,241,778
Other Insurance	1,021,080									1,021,080	100,372	1,121,451	110,239	1,231,690
Injuries & Damages	128,826									128,826	51,009	179,835		179,835
UNICAP	(1,291,538)									(1,291,538)	(144,809)	(1,436,347)	(161,046)	(1,597,393)
Postage	40,067				1,188,082			(3,500)		1,224,649	111,924	1,336,573	122,153	1,458,726
Information Services	5,906,584									5,906,584	746,737	6,653,321	185,959	6,839,280
Clearing Budget Item	1,275,192					(1,243,933)				31,259		31,259		31,259
Cyber/Command Center	-					1,243,933				1,243,933	153,318	1,397,251	34,446	1,431,697
Messenger Expense	89,985									89,985		89,985		89,985
Environmental	52,546									52,546		52,546		52,546
Accounting Adj & Accr	1,674,317		(1,674,317)							-		-		-
LIURP			1,391,000							1,391,000		1,391,000		1,391,000
GTI			526,466							526,466		526,466	(226,466)	300,000
Rate Case Expense										-	343,952	343,952		343,952
	71,006,536	1,588,661	-		-	-	(2,404,146)	(1,016,325)	529,856	69,704,582	5,955,041	75,659,623	4,047,002	79,706,625

NATIONAL FUEL EXHIBIT ATF-2

O&M EXPENSE FTY ADJUSTMENTS

National Fuel Gas Pennsylvania Distribution
Before the Pennsylvania Public Utility Commission
Future Test Year - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Outside Services

Line #	Description	[1] Amount	[2] Total
Adjustment #1 - Mowing			
1	Increased mowing activity		$ 65
Adjustment #2 - Close Interval Surveys			
2	Increased close interval survey activity		189
Adjustment #3 - Restorations: Three-Year Average			
3	FY23	588	
4	FY24	605	
5	FY25	440	
6	Three-Year Average	544	
7	Adjustment to bring FTY to three-year average		105
Total Outside Services Adjustment			
9	Pro Forma Adjustment		$ 359

National Fuel Gas Pennsylvania Distribution
Before the Pennsylvania Public Utility Commission
Future Test Year - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Office Employee Expenses

Line #	Description	[1] Amount	[2] Total
Adjustment #1: Items in excess of TME 9/30/2025 - Consolidated Oracle DBMS & Exadata			
1	Full Year of Consolidated Oracle DBMS & Exadata licensing	$ 622	
2	Less: TME 9/30/2025 Consolidated Oracle DBMS & Exadata licensing	(155)	
3	Subtotal of Increase	$ 466	
4	PAD Portion of expense	24.70%	
5	Pro-Forma Adjustment #1		$ 115
Adjustment #2: Inflation			
6	Normalized TME 9/30/25 Office Employee Expense	$ 1,754	
7	CAGR	3.67%	
8	Pro-Forma Adjustment #3		$ 64
Total OEE Adjustment			
9	Pro Forma Adjustment		$ 180

National Fuel Gas Pennsylvania Distribution
Before the Pennsylvania Public Utility Commission
Future Test Year - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Research/Development

Line #	Description	[1] Amount	[2] Total
Adjustment #1 - FTY Planned RD&D Projects			
1	Commercial	$ 46	
2	Industrial	61	
3	Admin. Costs	47	
4	Operations	23	
5	Subtotal		$ 176
6	Less: Normalized TME 9/30/25 Research/Development		$ (40)
Total Research/Development Adjustment			
7	Pro Forma Adjustment		$ 137

National Fuel Gas Pennsylvania Distribution
Before the Pennsylvania Public Utility Commission
Future Test Year - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Other Expense

Line #	Description	[1] Amount	[2] Total
Line Hit Collections - 3 Year Average			
1	FY23	$ (232)	
2	FY24	(199)	
3	FY25	(449)	
4	3 Year Average	$ (293)	
Adjustment for FTY			
5	HTY (FY25)	$ (449)	
6	3 Year Average	(293)	
7	Pro Forma Adjustment		$ 156

National Fuel Gas Pennsylvania Distribution
Before the Pennsylvania Public Utility Commission
Future Test Year - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Uncollectibles

Line	Description	Per Book Net W/O	OPEB Credit Adj.	Adj. Net W/O	Description	Per Book Revenue	OPEB Bill Impact	Ad. Revenue	Write-off Percent
1	12 Months ended September 2022	$2,851	$0	$2,851	12 Months ended September 2021	$199,458	$0	$199,458	1.43%
2	12 Months ended September 2023	$2,859	$481	$3,340	12 Months ended September 2022	$247,019	-$30,838	$216,182	1.55%
3	12 Months ended September 2024	$4,221	$91	$4,312	12 Months ended September 2023	$276,460	-$5,838	$270,623	1.59%
4	Three-Year Average			$3,501				$228,754	1.53%
5	Management Adj.								0.02%
6	Uncollectible Factor								1.55%
	FTY Projection								
7	Projected Gross Revenue - FTY								$258,302
8	Uncollectible Factor								1.55%
9	7 * 8 = Projected uncollectible accounts expense - FTY								$4,004
10	Remove CAP arrearage forgiveness portion (three-year average)								(749)
11	Adjusted FTY Uncollectible Expense								$3,254
12	Normalized HTY Uncollectible Expense								3,462
13	Pro Forma Adjustment (Line 11 - Line 12)								-$207

National Fuel Gas Pennsylvania Distribution
Before the Pennsylvania Public Utility Commission
Future Test Year - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Injuries & Damages

Line #	Description	[1] Amount	[2] Total
Injuries & Damges- 3 Year Average			
1	FY23	$ 154	
2	FY24	257	
3	FY25	129	
4	3 Year Average	$ 180	
Adjustment for FTY			
5	HTY (FY25)	$ 129	
6	3 Year Average	180	
7	Pro Forma Adjustment		$ 51

National Fuel Gas Pennsylvania Distribution
Before the Pennsylvania Public Utility Commission
Future Test Year - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Postage

Line #	Description	[1] Amount	[2] Total
Historic Postage Rates - 1oz. Stamp			
1	Jan 1, 2023	$ 0.600	
2	Jan 22, 2023	$ 0.630	
3	Jul 9, 2023	$ 0.660	
4	Jan 21, 2024	$ 0.680	
5	July 14, 2024	$ 0.730	
6	July 13, 2025	$ 0.780	
7	2023 to 2025 (3-year) CAGR	9%	
Postage Adjustment			
8	TME 9/30/25 Normalized Postage Expesnse	1,225	
9	3-year CAGR (from above)	9%	
10	FTY Adjustment		112

National Fuel Gas Pennsylvania Distribution
Before the Pennsylvania Public Utility Commission
Future Test Year - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Information Services

Line #	Description	[1] Amount	[2] Total
Info Services Adjustment #1: Items in excess of TME 9/30/2025			
1	New applications	$ 552	
2	Incremental software licensing	1,450	
3	Subtotal of Increases	$ 2,001	
4	PAD Portion of IT expenses	24.70%	
5	Pro-Forma Adjustment #1		$ 494
Info Services Adjustment #2: New Hires			
6	Incremental 3 positions	$ 300	
7	PAD Portion of IT labor expenses	24.96%	
8	Pro-Forma Adjustment #2		$ 75
Info Services Adjustment #3: Labor & Benefits Increase			
9	TME 9/30/25 PAD Information Services Labor & Benefits Expense	$ 4,017	
10	TME 9/30/25 PAD IS - Incentive Compensation	$ (279)	
11	Subtotal	$ 3,737	
12	Supervisory Wage Increase	4.75%	
13	Pro-Forma Adjustment #3		$ 178
Total Info Services Adjustment			
14	Pro Forma Adjustment		$ 747

National Fuel Gas Pennsylvania Distribution
Before the Pennsylvania Public Utility Commission
Future Test Year - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Command Center/Cyber

Line #	Description	[1] Amount	[2] Total
Cyber/Command Center Adjustment #1: Command Center Labor & Benefits			
1	TME 9/30/26 Projected Command Center Labor - fully staffed	$ 1,006	
2	PAD Portion of Command Center expenses	14.83%	
3	PAD TME 9/30/26 Command Center Labor	$ 149	
4	Less: PAD TME 9/30/25 Command Center Labor	22	
5	Pro-Forma Adjustment #1		$ 127
Cyber/Command Center Adjustment #2: Cyber Labor & Benefits			
6	TME 9/30/25 PAD Cyber Labor & Benefits	$ 595	
7	TME 9/30/25 PAD Cyber - Incentive Compensation	(45)	
8	Subtotal	$ 550	
9	Supervisory Wage Increase	4.75%	
10	Pro-Forma Adjustment #2		$ 26
Total Info Services Adjustment			
11	Pro Forma Adjustment		$ 153

National Fuel Gas Pennsylvania Distribution
Before the Pennsylvania Public Utility Commission
Future Test Year - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Rate Case Expense

Line #	Description	[1] Amount	[2] Total
Rate Case Expenditures			
1	External Consultants	$ 382	
2	External Legal	480	
3	Advertising / Other Misc. Costs	170	
4	Subtotal		$ 1,032
Total Expenditures for Rate Case Filing			
5	Total Rate Case Expenses		$ 1,032
6	Normalized over 3 years		3
7	Pro Forma Adjustment		$ 344

National Fuel Gas Pennsylvania Distribution
Before the Pennsylvania Public Utility Commission
Future Test Year - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - CAP

Line #	Description	[1] Amount	[2] Total
Remove LIRA Program Costs in TME 9/30/25			
1	Uncollectible Expense	$ 914	
2	Postage	4	
3	Office - Employee Expenses	3	
4	Outside Services	96	
5	Utilities	0	
6	Subtotal of Program Costs	$ 1,016	
7	Program Costs to Remove		$ (1,016)

National Fuel Gas Pennsylvania Distribution
Before the Pennsylvania Public Utility Commission
Future Test Year - 12 Months Ended September 30, 2026
($ in Thousands)

Adjustment - Advertising

Line #	Description	[1] Amount	[2] Total
Items in excess of HTY:			
1	Smell Gas Leave Fast Campaign	$ 15	
2	Call Before You Dig	11	
Total Advertising Adjustment			
3	Pro Forma Adjustment		$ 26

NATIONAL FUEL EXHIBIT ATF-3

O&M EXPENSE FPFTY ADJUSTMENTS

National Fuel Gas Pennsylvania Distribution
Before the Pennsylvania Public Utility Commission
FPFTY - 12 Months Ended November 30, 2027
($ in Thousands)

Adjustment - Uncollectibles

Line	Description	Per Book Net W/O	OPEB Credit Adj.	Adj. Net W/O	Description	Per Book Revenue	OPEB Bill Impact	Ad. Revenue	Write-off Percent
1	12 Months ended September 2022	$2,851	$0	$2,851	12 Months ended September 2021	$199,458	$0	$199,458	1.43%
2	12 Months ended September 2023	$2,859	$481	$3,340	12 Months ended September 2022	$247,019	-$30,838	$216,182	1.55%
3	12 Months ended September 2024	$4,221	$91	$4,312	12 Months ended September 2023	$276,460	-$5,838	$270,623	1.59%
4	Three-Year Average			$3,501				$228,754	1.53%
5	Management Adj.								0.02%
6	Uncollectible Factor								1.55%
	FPFTY Projection								
7	Projected Gross Revenue - FPFTY								$265,524
8	Uncollectible Factor								1.55%
9	6 * 7 = Projected uncollectible accounts expense - FPFTY								$4,116
10	Remove CAP arrearage forgiveness portion								(749)
11	Adjusted FPFTY Uncollectible Expense								$3,366
12	FTY Uncollectible Expense								3,254
13	Pro Forma Adjustment (Line 9 - Line 10)								$112

National Fuel Gas Pennsylvania Distribution
Before the Pennsylvania Public Utility Commission
FPFTY - 12 Months Ended November 30, 2027
($ in Thousands)

Adjustment - Postage

Line #	Description	[1] Amount	[2] Total
Historic Postage Rates - 1oz. Stamp			
1	Jan 1, 2023	$ 0.600	
2	Jan 22, 2023	$ 0.630	
3	Jul 9, 2023	$ 0.660	
4	Jan 21, 2024	$ 0.680	
5	July 14, 2024	$ 0.730	
6	July 13, 2025	$ 0.780	
7	2023 to 2025 CAGR		9%
Postage Adjustment			
8	FTY Postage Expense	1,337	
9	3 year CAGR (from above)	9%	
10	FTY Adjustment		122

National Fuel Gas Pennsylvania Distribution
Before the Pennsylvania Public Utility Commission
FPFTY - 12 Months Ended November 30, 2027
($ in Thousands)

Adjustment - Information Services

Line #	Description	[1] Amount	[2] Total
Info Services Adjustment #1: Labor & Benefits Increase			
1	TME 9/30/26 PAD Information Services Labor & Benefits Expense	$ 3,915	
2	Supervisory Wage Increase	4.75%	
3	Pro-Forma Adjustment #1		$ 186

National Fuel Gas Pennsylvania Distribution
Before the Pennsylvania Public Utility Commission
FPFTY - 12 Months Ended November 30, 2027
($ in Thousands)

Adjustment - Cyber/Command Center

Line #	Description	[1] Amount	[2] Total
Info Services Adjustment #1: Labor & Benefits Increase			
1	TME 9/30/26 PAD Cyber & Command Center Labor & Benefits Expense	$ 725	
2	Supervisory Wage Increase	4.75%	
3	Pro-Forma Adjustment #1		$ 34

NATIONAL FUEL EXHIBIT ATF-4

O&M EXPENSE - LABOR ADJUSTMENTS

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operation and Maintenance Adjustments to Labor
Twelve Months Ended 9/30/25 & TME 9/30/26

	Per Book TME 9/30/25	Adjustment	Normalized HTY TME 9/30/25	Adjustment	Normalized FTY 9/30/26
Pennsylvania Division Labor	$27,125,240	$525,075	$27,650,314	$2,398,815	$30,049,129
New York Division Labor	5,375,527	13,226	5,388,752	315,318	5,704,070
Other Subsidiaries Labor	2,068,556	(8,445)	2,060,111	84,376	2,144,487
Total Labor	$34,569,322	$529,856	$35,099,178	$2,798,508	$37,897,686
Percentage Change					
Pennsylvania Division Labor		1.94%		8.68%	
New York Division Labor		0.25%		5.85%	
Other Subsidiaries Labor		-0.41%		4.10%	

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operation and Maintenance Adjustments to Labor
For the Link Month Oct 2026 and Twelve Motnhs Ending Oct '27

	Normalized FTY 9/30/26	Adjustment	Link Month TME Oct '26	Adjustment	Rate Year Nov '26 - Oct '27
Pennsylvania Division Labor	$30,049,129	$249,458	$30,298,587	$2,038,244	$32,336,831
New York Division Labor	5,704,070	18,592	5,722,663	259,007	5,981,670
Other Subsidiaries Labor	2,144,487	10,801	2,155,288	118,267	2,273,555
Total Labor	$37,897,686	$278,851	$38,176,537	$2,415,518	$40,592,056
Percentage Change					
Pennsylvania Division Labor		0.83%		6.73%	
New York Division Labor		0.33%		4.53%	
Other Subsidiaries Labor		0.50%		5.49%	

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations And Maintenance Expense Adjustments To Labor
Pennsylvania Labor
Normalized TME 9/30/25

Classification		(1) Total	(2) Factor to Annualize	(3) Adjustment to Normalize Twelve Months Ended 9/30/25 Gross Annualized	(4) O&M %	(5)= (3)x(4) Net O&M
Non-Supervisory Wages for the Week ended Sept 27, 2025						
2154 PA Suppl 93-2003	$	1,578	52.14	$82,261	73.14%	$60,165
Excluded	$	8,125	52.14	423,650	73.14%	309,858
IBFO Local 22 Supplemental	$	127,692	52.14	6,658,230	73.14%	4,869,829
Local 2154 PA New Supplemental	$	143,844	52.14	7,500,452	73.14%	5,485,830
Local 2154 PA Production	$	3,333	52.14	173,771	73.14%	127,096
Local 22 Firemen/Oilers	$	1,563	52.14	81,510	73.14%	59,616
PA Non-Union Hourly	$	96,677	52.14	5,041,029	73.14%	3,687,008
Total Salaries for the pay period Sept 30, 2025						
Supervisory	$	589,853	24.00	14,156,462	73.14%	10,354,036
Other Annualized Payroll						
Temporary Payroll (Summer Help/Interns)	$	46,534	1.00	46,534	73.14%	34,035
Payroll not subject to wage increases	$	269,964	1.00	269,964	73.14%	197,451
Overtime - Total for All Nonsalaried Employees	$	1,319,913	1.00	1,319,913	73.14%	965,384
Subtotal				$35,753,774		$26,150,310
O&M Specific Items (not impacted by O&M % on this schedule)						
Variable Compensation (see Labor Adj. Schedule)						1,500,004
Total NYD O&M Labor						$27,650,314

National Fuel Gas Distribution Corporation
Pennsylvania Division
Labor Expense
Pennsylvania Labor
Oct 2025 to Oct 2026 (FTY & Link Period)

	Net O&M Normalized TME 9/30/25	Monthly	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26	FTY	Oct-26
2154 PA Suppl 93-2003	$ 60,165	$ 5,014	5,014	5,014	5,014	5,666	5,666	5,666	5,666	5,666	5,666	5,666	5,666	5,666	**$ 66,032**	5,666
Excluded	$ 309,858	$ 25,821	25,821	25,821	25,821	26,854	26,854	26,854	26,854	26,854	26,854	26,854	26,854	26,854	**$ 319,154**	26,854
IBFO Local 22 Supplemental	$ 4,869,829	$ 405,819	405,819	405,819	405,819	446,401	446,401	446,401	446,401	446,401	446,401	446,401	446,401	446,401	**$ 5,235,067**	446,401
Local 2154 PA New Supplemental	$ 5,485,830	$ 457,153	457,153	457,153	457,153	516,582	516,582	516,582	516,582	516,582	516,582	516,582	516,582	516,582	**$ 6,020,699**	516,582
Local 2154 PA Production	$ 127,096	$ 10,591	10,591	10,591	10,591	11,968	11,968	11,968	11,968	11,968	11,968	11,968	11,968	11,968	**$ 139,488**	11,968
Local 22 Firemen/Oilers	$ 59,616	$ 4,968	4,968	4,968	4,968	5,465	5,465	5,465	5,465	5,465	5,465	5,465	5,465	5,465	**$ 64,087**	5,465
PA Non-Union Hourly	$ 3,687,008	$ 307,251	307,251	307,251	307,251	319,541	319,541	319,541	319,541	319,541	319,541	319,541	319,541	319,541	**$ 3,797,619**	319,541
Supervisory	$ 10,354,036	$ 862,836	862,836	862,836	862,836	903,821	903,821	903,821	903,821	903,821	903,821	903,821	903,821	903,821	**$ 10,722,899**	903,821
Temporary Payroll (Summer Help/Interns)	$ 34,035	$ 2,836	2,836	2,836	2,836	2,836	2,836	2,836	2,836	2,836	2,836	2,836	2,836	2,836	**$ 34,035**	2,836
Payroll not subject to wage increases	$ 197,451	$ 16,454	16,454	16,454	16,454	16,454	16,454	16,454	16,454	16,454	16,454	16,454	16,454	16,454	**$ 197,451**	16,454
Overtime - Total for All Nonsalaried Employees	$ 965,384	$ 80,449	80,449	80,449	80,449	89,700	89,700	89,700	89,700	89,700	89,700	89,700	89,700	89,700	**$ 1,048,649**	89,700
	Base Amount	**Monthly**														
Forecasted Retirements	$ (46,448)	$ (3,871)	(3,871)	(3,871)	(3,871)	(3,871)	(3,871)	(3,871)	(3,871)	(3,871)	(3,871)	(3,871)	(3,871)	(3,871)	**$ (46,448)**	(3,871)
Forecasted Headcount Differential	$ (446,079)	$ (37,173)	(37,173)	(37,173)	(37,173)	(37,173)	(37,173)	(37,173)	(37,173)	(37,173)	(37,173)	(37,173)	(37,173)	(37,173)	**$ (446,079)**	(37,173)
Non-Union Hourly - Salary Adjustment	$ 526,000	$ 43,833				43,833	43,833	43,833	43,833	43,833	43,833	43,833	43,833	43,833	**$ 394,500**	43,833
Supervisory - Salary Adjustment	$ 145,000	$ 12,083				12,083	12,083	12,083	12,083	12,083	12,083	12,083	12,083	12,083	**$ 108,750**	12,083
New Hires	$ 821,974	$ 68,498	68,498	68,498	68,498	68,498	68,498	68,498	68,498	68,498	68,498	68,498	68,498	68,498	**$ 821,974**	95,942
Variable Pay	$ 1,500,004				392,814			392,814			392,814			392,814	**$ 1,571,255**	
Total PAD Labor			$ 2,206,646	$ 2,206,646	$ 2,599,460	$ 2,428,659	$ 2,428,659	$ 2,821,473	$ 2,428,659	$ 2,428,659	$ 2,821,473	$ 2,428,659	$ 2,428,659	$ 2,821,473	**$ 30,049,129**	$ 2,456,104

National Fuel Gas Distribution Corporation
Pennsylvania Division
Labor Expense
Pennsylvania Labor
Fiscal Year 2027: Nov 2026 to Oct 2027 (Rate Year)

	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27	Apr-27	May-27	Jun-27	Jul-27	Aug-27	Sep-27	Oct-27	Rate Year
2154 PA Suppl 93-2003	5,666	5,666	5,666	5,666	5,666	5,751	5,836	5,836	5,836	5,836	5,836	5,836	$ 69,092
Excluded	26,854	26,854	27,929	27,929	27,929	27,929	27,929	27,929	27,929	27,929	27,929	27,929	$ 332,994
IBFO Local 22 Supplemental	477,649	477,649	477,649	477,649	477,649	477,649	491,979	491,979	491,979	491,979	491,979	491,979	$ 5,817,766
Local 2154 PA New Supplemental	516,582	516,582	516,582	516,582	516,582	524,331	532,080	532,080	532,080	532,080	532,080	532,080	$ 6,299,722
Local 2154 PA Production	11,968	11,968	11,968	11,968	11,968	12,148	12,327	12,327	12,327	12,327	12,327	12,327	$ 145,953
Local 22 Firemen/Oilers	5,847	5,847	5,847	5,847	5,847	5,847	6,023	6,023	6,023	6,023	6,023	6,023	$ 71,221
PA Non-Union Hourly	319,541	319,541	332,322	332,322	332,322	332,322	332,322	332,322	332,322	332,322	332,322	332,322	$ 3,962,305
Supervisory	903,821	903,821	946,753	946,753	946,753	946,753	946,753	946,753	946,753	946,753	946,753	946,753	$ 11,275,168
Temporary Payroll (Summer Help/Interns)	2,836	2,836	2,836	2,836	2,836	2,836	2,836	2,836	2,836	2,836	2,836	2,836	$ 34,035
Payroll not subject to wage increases	16,454	16,454	16,454	16,454	16,454	16,454	16,454	16,454	16,454	16,454	16,454	16,454	$ 197,451
Overtime - Total for All Nonsalaried Employees	92,840	92,840	92,840	92,840	92,840	94,232	95,625	95,625	95,625	95,625	95,625	95,625	$ 1,132,181
Forecasted Retirements	(3,871)	(3,871)	(3,871)	(3,871)	(3,871)	(3,871)	(3,871)	(3,871)	(3,871)	(3,871)	(3,871)	(3,871)	$ (46,448)
Forecasted Headcount Differential	(37,173)	(37,173)	(37,173)	(37,173)	(37,173)	(37,173)	(37,173)	(37,173)	(37,173)	(37,173)	(37,173)	(37,173)	$ (446,079)
Non-Union Hourly - Salary Adjustment	43,833	43,833	45,587	45,587	45,587	45,587	45,587	45,587	45,587	45,587	45,587	45,587	$ 543,533
Supervisory - Salary Adjustment	12,083	12,083	12,657	12,657	12,657	12,657	12,657	12,657	12,657	12,657	12,657	12,657	$ 150,740
New Hires	95,942	95,942	95,942	95,942	95,942	95,942	95,942	95,942	95,942	95,942	95,942	95,942	$ 1,151,309
Variable Pay		411,472			411,472			411,472			411,472		$ 1,645,889
Total PAD Labor	$ 2,490,874	$ 2,902,347	$ 2,549,989	$ 2,549,989	$ 2,961,461	$ 2,559,395	$ 2,583,305	$ 2,994,778	$ 2,583,305	$ 2,583,305	$ 2,994,778	$ 2,583,305	$ 32,336,831

Annual Increases:	2026	2027
Supervisory/Executive	4.75%	4.75%
NYD Hourly	3.00%	3.00%
Supply Hourly	10.00%	4.00%

	TME 9/30/25	**Sep-25 Normalized**	**Oct-25**	**Nov-25**	**Dec-25**	**Jan-26**	**Feb-26**	**Mar-26**	**Apr-26**	**May-26**	**Jun-26**	**Jul-26**	**Aug-26**	**Sep-26**	**Oct-26**
NYD Supervisory	$ 3,412,790	$ 273,976	$ 273,976	$ 273,976	$ 273,976	$ 286,990	$ 286,990	$ 286,990	$ 286,990	$ 286,990	$ 286,990	$ 286,990	$ 286,990	$ 286,990	$ 286,990
NYD Hourly	$ 744,594	59,775	59,775	59,775	59,775	59,775	60,672	61,569	61,569	61,569	61,569	61,569	61,569	61,569	61,569
NYD Executive Labor	$ 790,668	79,688	79,688	79,688	79,688	83,473	83,473	83,473	83,473	83,473	83,473	83,473	83,473	83,473	83,473
NYD Executive Bonus	$ 427,475				578,152										
Supply Supervisory	$ 829,389	$ 69,043	69,043	69,043	69,043	72,323	72,323	72,323	72,323	72,323	72,323	72,323	72,323	72,323	72,323
Supply Hourly	$ 811,880	67,586	67,586	67,586	67,586	67,586	67,586	67,586	70,965	74,344	74,344	74,344	74,344	74,344	74,344
Supply Executive Labor	$ 198,153	15,916	15,916	15,916	15,916	16,672	16,672	16,672	16,672	16,672	16,672	16,672	16,672	16,672	16,672
Supply Executive Bonus	$ 227,817				238,638										
Midstream Supervisory	$ 1,317	146	146	146	146	153	153	153	153	153	153	153	153	153	153
Total	$ 7,444,083	$ 566,131	$ 566,131	$ 566,131	$ 1,382,921	$ 586,973	$ 587,869	$ 588,766	$ 592,145	$ 595,524	$ 595,524	$ 595,524	$ 595,524	$ 595,524	$ 595,524

	Nov-26	**Dec-26**	**Jan-27**	**Feb-27**	**Mar-27**	**Apr-27**	**May-27**	**Jun-27**	**Jul-27**	**Aug-27**	**Sep-27**	**Oct-27**	**Rate Year**
NYD Supervisory	$ 286,990	$ 286,990	$ 300,622	$ 300,622	$ 300,622	$ 300,622	$ 300,622	$ 300,622	$ 300,622	$ 300,622	$ 300,622	$ 300,622	**$ 3,580,202**
NYD Hourly	61,569	61,569	61,569	62,492	63,416	63,416	63,416	63,416	63,416	63,416	63,416	63,416	**$ 754,524**
NYD Executive Labor	83,473	83,473	87,438	87,438	87,438	87,438	87,438	87,438	87,438	87,438	87,438	87,438	**$ 1,041,328**
NYD Executive Bonus	-	605,614											**$ 605,614**
Supply Supervisory	72,323	72,323	75,758	75,758	75,758	75,758	75,758	75,758	75,758	75,758	75,758	75,758	**$ 902,224**
Supply Hourly	74,344	74,344	74,344	74,344	74,344	75,831	77,318	77,318	77,318	77,318	77,318	77,318	**$ 911,458**
Supply Executive Labor	16,672	16,672	17,464	17,464	17,464	17,464	17,464	17,464	17,464	17,464	17,464	17,464	**$ 207,988**
Supply Executive Bonus	-	249,973											**$ 249,973**
Midstream Supervisory	153	153	161	161	161	161	161	161	161	161	161	161	**$ 1,912**
Total	$ 595,524	$ 1,451,112	$ 617,356	$ 618,279	$ 619,203	$ 620,690	$ 622,177	$ 622,177	$ 622,177	$ 622,177	$ 622,177	$ 622,177	$ 8,255,225

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations And Maintenance Expense - Labor
Labor Savings

Retirements

	FY 2023	FY 2024	FY 2025	AVG
PAD				
Supv	1	1	2	1
Hourly	8	2	4	5
Total	9	3	6	6

Headcount Differential

PAD	FY 2023	FY 2024	FY 2025	AVG	Factor
Avg. Non Exec Labor Budget	433	444	446		
Average Actual Count	419	437	441		
Differential	14	7	5		
	3.2%	1.6%	1.1%	2.0%	

Projected Supv. Retirements		1
Avg. Rate Retirees	$	57.69
Avg. Rate New Hire	$	31.25
Duration (hours)		1,040
O&M %		73.14%
O&M Labor Savings	$	26,818

Projected Hourly Retirements		5
Avg. Rate Retirees	$	39.44
Avg. Rate New Hire	$	33.91
Duration (hours)		1,040
O&M %		73.14%
O&M Labor Savings	$	19,630

	FTY	FPFTY
Proposed Non-Executive Headcount FY26	453	459
Forecasted Staffing Level	98.0%	98.0%
Forecasted Headcount for RR	444	450
Headcount Differential	9	9
O&M Factor	73.14%	73.14%
Avg. Wage Rate	$ 67,766	$ 67,766
Labor Savings	$ 446,079	$ 446,079

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations And Maintenance Expense - Labor
New Hires

Number	Job Title	Department	O&M%	Labor Group	Annual Salary	PAD O&M Impact	Add Year
1	Service Representative	Consumer Business	98.2%	Non-Union Hourly	$ 48,610	$ 47,735	FTY
2	Service Representative	Consumer Business	98.2%	Non-Union Hourly	$ 48,610	$ 47,735	FTY
3	Service Representative	Consumer Business	98.2%	Non-Union Hourly	$ 48,610	$ 47,735	FTY
4	Service Representative	Consumer Business	98.2%	Non-Union Hourly	$ 48,610	$ 47,735	FTY
5	Service Representative	Consumer Business	98.2%	Non-Union Hourly	$ 48,610	$ 47,735	FTY
6	Service Representative	Consumer Business	98.2%	Non-Union Hourly	$ 48,610	$ 47,735	FTY
7	Service Representative	Consumer Business	98.2%	Non-Union Hourly	$ 48,610	$ 47,735	FTY
8	Service Representative	Consumer Business	98.2%	Non-Union Hourly	$ 48,610	$ 47,735	FTY
9	Meter Reader	Operations	78.9%	2154 PA Suppl	$ 38,272	$ 30,206	FTY
10	General Fitter	Operations	78.9%	2155 PA Suppl	$ 67,704	$ 53,435	FTY
11	Gas Mechanic	Operations	78.9%	Local 22 Suppl	$ 69,514	$ 54,863	FTY
12	Service Specialist	Operations	78.9%	Local 22 Suppl	$ 61,443	$ 48,494	FTY
13	Meter Reader	Operations	78.9%	Local 22 Suppl	$ 37,523	$ 29,615	FTY
14	Meter Reader	Operations	78.9%	Local 22 Suppl	$ 37,523	$ 29,615	FTY
15	Business Support Analyst	Operations	78.9%	Salaried	$ 70,250	$ 55,445	FTY
16	Corporate Recruiter	Human Resources	97.2%	Salaried	$ 65,250	$ 63,423	FTY
17	Field Operations Development Supervisor	Mechanical	100.0%	Salaried	$ 75,000	$ 75,000	FTY
18	Consumer Business Manager (CAP)	Consumer Business	98.2%	Salaried	$ 72,000	$ 70,704	FPFTY
19	Service Representative (CAP)	Consumer Business	98.2%	Non-Union Hourly	$ 48,610	$ 47,735	FPFTY
20	Service Representative (CAP)	Consumer Business	98.2%	Non-Union Hourly	$ 48,610	$ 47,735	FPFTY
21	Gas Mechanic	Operations	78.9%	2154 PA Suppl	$ 69,514	$ 54,863	FPFTY
22	Gas Mechanic	Operations	78.9%	2154 PA Suppl	$ 69,514	$ 54,863	FPFTY
23	General Fitter	Operations	78.9%	2154 PA Suppl	$ 67,704	$ 53,435	FPFTY
						$ 1,151,309	

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations And Maintenance Expense - Labor
PA Raises

	2026	2027	2027	Raise Dates
2154 PA Suppl 93-2003	13.00%	0.00%	3.00%	1/1/26 & 4/11/27
Excluded	4.00%	4.00%		1/1/26 & 1/1/27
IBFO Local 22 Supplemental	10.00%	7.00%	3.00%	1/1/26, 11/1/26, 5/1/27
Local 2154 PA New Supplemental	13.00%	0.00%	3.00%	1/1/26 & 4/11/27
Local 2154 PA Production	13.00%	0.00%	3.00%	1/1/26 & 4/11/27
Local 22 Firemen/Oilers	10.00%	7.00%	3.00%	1/1/26, 11/1/26, 5/1/27
PA Non-Union Hourly	4.00%	4.00%		1/1/26 & 1/1/27
Supervisory	4.75%	4.75%		1/1/26 & 1/1/27

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 3-R

Rebuttal Testimony of Anthony T. Formato

Topics Addressed: O&M Expense

Dated: May 12, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Anthony T. Formato. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. Did you previously submit testimony in this proceeding on behalf of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company")?

A. Yes. I submitted my direct testimony, National Fuel Statement No. 3, on January 28, 2026.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your rebuttal testimony.

A. My rebuttal testimony addresses certain portions of direct testimony submitted by the Bureau of Investigation and Enforcement ("I&E"), the Pennsylvania Office of Consumer Advocate ("OCA"), and the Pennsylvania Office of Small Business Advocate ("OSBA"), specifically: I&E Statement No. 1, the direct testimony of Christopher Keller, OCA Statement No. 2, the direct testimony of Lafayette K. Morgan, Jr., and OSBA Statement No. 1, the direct testimony of Justin B. Farr. For the purposes of this testimony, the aforementioned statements of I&E, OCA, and OSBA will be referred to as "other parties."

Q. Are you sponsoring any exhibits with your rebuttal testimony?

A. No.

III. HEADCOUNT

Q. Have any other parties proposed an adjustment to the Company's proposed headcount?

A. Yes, OSBA proposes a downward adjustment to headcount of 9.67 full time employees ("FTE"), based on the difference between the projected headcount for the fully projected future test year ("FPFTY") and the average headcount for the Twelve Months Ending ("TME") January 31, 2026. This headcount reduction translates to a $525,364 decrease to the overall revenue requirement. OSBA argues that ratepayers should not be required to pay rates based on a headcount in excess of the Company's most recent actual expense. As support for their downward adjustment, OSBA argues that the Company has consistently reported actual headcounts below its budgeted staffing levels.

Q. Do you agree with this adjustment?

A. No. There are two inconsistencies in the rationale provided by OSBA for its adjustment. First, OSBA relies on the fact that the Company's actual headcount has been below the budgeted headcount in recent years. This is not something that the Company disputes, as routine turnover and recruitment lag lends itself to headcounts below planned levels. However, the Company's filed position already reflects a downward adjustment for 9 FTEs for this exact reason. Additionally, the OSBA's argument that ratepayers should only pay for rates based on current employee counts goes against the construct of a

forward-looking test period. As described in my direct testimony, the Company's labor forecast was based on actual headcount as of September 30, 2025 (436 employees), with forecasted additions by the end of the FPFTY of 23, for a total headcount of 459 employees. This headcount was determined using the approved Company headcount of 453 for the future test year ("FTY"), which was established in the Company's fiscal year ("FY") 2026 Operations & Maintenance Budget, plus six additional positions for the FPFTY. These six incremental positions are detailed below:

1. Consumer Business Manager (Salaried): Additional Supervisor for day-to-day Call Center management functions as Company has now assumed responsibility for the Customer Assistance Program ("CAP") program administration and is no longer outsourcing this function.
2. Call Center Representative (Non-Union Hourly): Additional representative needed to backfill for hourly employee focused on CAP program matters.
3. Call Center Representative (Non-Union Hourly): Additional representative needed to backfill for hourly employee focused on CAP program matters.
4. Gas Mechanic (Union Hourly): Additional crew member (1 of 2) to support the Company's internal share of growing Leak Prone Pipe ("LPP") mileage.
5. Gas Mechanic (Union Hourly): Additional crew member (2 of 2) to support the Company's internal share of growing LPP mileage.
6. General Fitter (Union Hourly): The General Fitter performs skilled field work associated with the construction, maintenance, installation, and repair of natural gas distribution facilities.

As shown in direct testimony Exhibit ATF-1, Schedule 4, a vacancy adjustment of nine employees was factored into the revenue requirement such that the Company was only seeking recovery for 450 employees in the FPFTY. As evidenced by the current headcount as of April 27, 2026, of 451 employees, the Company is already at a total headcount in excess of the filed headcount for the FPFTY. For these reasons, the Commission should reject OSBA's headcount adjustment and base the revenue requirement on a headcount of 450 employees .

IV. CHARGE OFF CUSTOMER ACCOUNTS/RECEIVABLE ("A/R") EXPENSE

Q. Have any other parties proposed an adjustment related to Uncollectible or Charge Off Customer A/R expense?

A. Yes, OCA advocates for the removal of $147,000 of Charge Off Customer A/R expense contained in the Company's Other Expense line item. This reduction is based on OCA's belief that this expense is contained within the Company's uncollectible factor.

Q. Do you agree with OCA's adjustment?

A. No. The Charge Off Customer A/R expense is a separate and distinct type of write-off, which is directly expensed to the Other Expense line item. Examples of charge offs include resolutions to non-registering meters, switched meters, shared meters, management decisions to resolve bill disputes, and usage on NFG Temp accounts. NFG Temp is an account that is used to cover usage between when a customer moves out of a premise and when gas is shut off. To be clear, there is zero crossover between these

charge offs which hit Other Expense on the Company's financials and the financial write-offs for non-payment, which are recovered through Uncollectible expense.

V. COMPOUND ANNUAL GROWTH RATES ("CAGR")

Q. Have any other parties proposed an adjustment related to Office Employee Expenses?

A. Yes, OCA states that the Company's filed approach of using the compound annual growth rate from FY 2023 to FY 2025 of 3.67% should be disallowed as it is not consistent with zero-based budgeting. As such, OCA proposes a downward adjustment of $64,000.

Q. Do you agree with OCA's adjustment?

A. No. The Office Employee Expenses line item is primarily made up of software, office equipment and employee training/travel expenses, which are all subject to inflationary price increases. The Company will not be able to negotiate terms which would allow for flat prices for two years, which is what OCA is suggesting by not allowing for inflationary growth on this line item between the historic test year ("HTY") and the FPFTY. A formal O&M budget for FY 2027, which would closely align to the FPFTY has yet to be developed and approved. This budget will be developed utilizing a zero-based budgeting approach. In the absence of a formal budget and given the nature of the expenses included in this line item, recent price increases (CAGR of 3.67%) were utilized to develop the forecasted expense for the FPFTY.

Q. Have any other parties proposed an adjustment related to Postage Expense?

A. Yes, OCA disagrees with the three-year CAGR utilized by the Company to project postage expense for the FPFTY stating that the growth in postage rates from 2023-2025 (the time period used for CAGR), was during a time of frequent postage increases and will not be the norm moving forward. Instead of annual 9% growth rates, OCA advocates for a 4.8% to the HTY value. OCA ties the 4.8% to the USPS announced increase of a first-class stamp that is slated for July 2026. As a result, OCA suggests a $175,000 reduction to postage expense.

Q. Do you agree with OCA's adjustment?

A. No. While neither OCA nor the Company can predict future postage rates, it is clear that postage rates continue to rise. By July of 2026, a first-class stamp, which was $0.60 at the start of January 2023, will be $0.82. Even with these increases, the USPS is still facing significant financial challenges and continues to warn of additional increases beyond July of 2026. As such, the Company feels that OCA's adjustment stops short and does not include likely increases in January and July of 2027.

VI. LINE HIT COLLECTIONS – OTHER EXPENSE

Q. Have any other parties proposed an adjustment related to line hit collections?

A. Yes, OCA proposed to move away from the Company's three-year average approach with respect to line hit collections. OCA's proposal to simply use the HTY value rather than a three-year average (FY23-FY25) results in a reduction of $156,000 to the Other Expense line item as collections were higher in the HTY as compared to the other two

years used in the three-year average calculation. OCA's claim is based on the belief that a period that exhibits high line hit collections, like the HTY, would also have higher repair expenses in that year such that the higher expense and higher collections act as a natural offset.

Q. Do you agree with OCA's adjustment?

A. No. First and foremost, line hit collections have significant lag such that the recovery from third parties routinely crosses over fiscal years from the incidents themselves. Once an incident occurs, costs are aggregated and then billed to the responsible party. The Company's Risk department will then work with the responsible party and often insurance providers to resolve the financial liability generated by the repair activity. Lag and crossover between years further supports the Company's proposal to use a three-year average to normalize activity. Additionally, the primary cost that is being recovered in a line-hit scenario is internal Company labor spent on making the situation safe and performing the necessary re-lights. OCA's claim is that in a year with higher recoveries, such as the HTY, the Company would experience an uptick in repair costs. However, since the primary cost is labor, this argument falls apart as the Company's forecast for internal labor was based on the annualization of September 2025 labor expense and does not have any element of a bump related to higher line hit repair expense. As such, the Company disputes OCA's proposal and stands behind the three-year normalization of line hit collections.

VII. DUES & MEMBERSHIPS

Q. Have any other parties proposed an adjustment related to Dues & Membership expense?

A. Yes, Both OCA and I&E propose adjustments to the Company's Dues & Memberships expense claim for organizations that in their determination have little benefit to ratepayers (not necessary to provide safe and reliable service). Specifically, OCA recommends a decrease of $17,000 related to specific Economic Development organizations. I&E recommends a decrease of $21,968 of membership dues for civic and community organizations that it claims are not necessary for safe and reliable service.

Q. Do you agree with these adjustments?

A. No. While both OCA and I&E challenge these expenses on the validity of their benefit to ratepayers, it is important to consider the overall impact these funds and the associated organizations have on ratepayers and the communities they reside in. The Company's limited support of chambers of commerce and economic development agencies is intended to directly benefit customers by promoting strong, resilient communities within its service territory. Economic growth helps retain and attract commercial and industrial use of natural gas, allowing fixed system costs to be spread over greater usage and helping to moderate upward pressure on rates. Participation in these organizations ensures energy infrastructure, safety, and reliability considerations are incorporated into local growth planning, thereby reducing long term system risks and costs. Building stronger communities, by supporting economic stability and affordable, reliable service

over the long term, benefits everyone, from the utility, to small and large businesses, to the residents who live and work in these communities.

VIII. RATE CASE EXPENSE

Q. Have any other parties proposed an adjustment related to Rate Case Expense?

A. Yes, I&E proposed changing the recovery period for rate case expense from the Company's proposed three-year period to a five-year recovery period. This change would reduce the Company's claim by $137,600. I&E bases its five-year proposal on the Company's recent rate case filings, shown below:

Docket No.	Date Filed	Interval
R-2025-3059428	January 28, 2026	39 months
R-2022-3035730	October 28, 2022	197 months
R-00061493	May 31, 2006	20 months
R-00049656	September 15, 2004	

Using the Company's last three filings and the timing of this proceeding, I&E calculates an average interval of 85 months and states that the Company's past filing cadence is far closer to their proposed 5-year interval than the Company's proposed 3-year.

Q. Do you agree with I&E's adjustment?

A. No. Two of the four data points utilized by I&E in its calculation are from over 20 years ago and are not indicative of the current business landscape. As described in National Fuel Statement No. 1, the direct testimony of Rebecca E. Hillery, the Company's filing was based on continued inflationary pressures on labor and other operating expenses coupled with accelerated infrastructure replacement and system modernization capital

investments. National Fuel Statement No. 9, the direct testimony of Mark C. Schaefer, highlights the Company's current Amended Long Term Infrastructure Improvement Plan and clearly illustrates the higher capital expenses that have been realized in recent years as well as the plan to continue to spend at accelerated levels, see below:

Table 1: Actual & Projected Annual Capital Expenditures Related to Modernization

Fiscal Year	CapEx ($MM)	Actual / Budget
2023	$37.2	Actual
2024	$48.5	Actual
2025	$43.8	Actual
2026	$57.4	Budget
2027	$66.5	Budget
Total	$253.4	

As a point of comparison, average modernization related capital expense from FY 2017 – FY 2021 was $23.8 MM. While the 16-year gap between the 2006 and 2022 filing is a data point, it is not one that should carry as much weight as the roughly three years between the October 2022 filing and the Company's January 2026 filing. This three-year gap is indicative of the Company's current operating model and increased investment plan and should be the basis for supporting the Company's three-year recovery of rate case expense.

IX. INSURANCE SETTLEMENT PROCEEDS

Q. Have any other parties proposed an adjustment related to Insurance Settlement Proceeds?

A. Yes, OCA recommends that a regulatory liability in the amount of $936,314 as of September 30, 2025, be refunded to ratepayers over a three-year period ($312,000/year).

OCA states that the liability, which today is being used to shield ratepayers from environmental expenses, should be passed back as these funds relate to an insurance settlement whose premiums were funded by ratepayers.

Q. Do you agree with OCA's proposal?

A. No. OCA's proposal has two fundamental flaws. The balance in this account continues to be reduced, as the company is actively processing environmental expenses against it. As of April 27, 2026, the balance in the account was down to $847,444. Additionally, if a three-year pass-back was established, a normalizing adjustment would be needed to re-establish the O&M expense that ratepayers were shielded from because of this account. In the HTY, environmental expense would have been $144,486 higher if not for this regulatory liability account. The Company proposes to continue with its historic practice of using these proceeds to offset new environmental expenses. If a decision is made to accept OCA's proposal, both the current balance of the account and the normalizing adjustment for the HTY shielded expense need to be considered.

X. SUMMARY

Q. Please summarize your rebuttal testimony.

A. As stated above, the Company disputes the O&M related adjustments proposed by OCA, OSBA, and I&E, including OCA's proposal to include customer payment transaction costs in O&M expense, which is discussed in National Fuel Statement No. 17-R, the rebuttal testimony of Matthew W. Stoops. As such, the Company is making no changes to the O&M expense it filed in its January 2026 original filing.

Q. Does this conclude your rebuttal testimony at this time?

A. Yes.

NATIONAL FUEL STATEMENT NO. 4

VALERIE L. HAWTHORN

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 4

Direct Testimony of
Valerie L. Hawthorn Wagner

Topics Addressed: Labor Market, Employee Retention and Total Rewards

Dated: January 28, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Valerie L. Hawthorn Wagner. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. By whom and in what capacity are you employed?

A. I am employed by National Fuel Gas Distribution Corporation ("NFGDC") as the Managing Director of Human Resources.

Q. Please provide your educational background.

A. I possess a Master of Business Administration degree and a Bachelor of Science in Business Administration degree, both from the State University of New York at Buffalo.

Q. Please provide your professional experience.

A. I began my employment with NFGDC in January 2005, as an Intern in the Human Resources department. Upon completion of this internship, I joined the Human Resources department in a full-time capacity as an HR Specialist in July 2005, focusing on recruitment and employment. Over the last twenty years, I've assumed roles of increasing responsibility in the Human Resources department, including becoming the Manager of Employment in 2013. Since February 2022, I have held the role of Managing Director (General Manager) of Human Resources. In my current capacity, I am responsible for the employment, benefits and payroll functions for active employees and retirees of NFGDC and affiliates.

Q. Have you previously testified in other proceedings before the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission") or any other state or federal agency?

A. Yes, I have provided testimony before the Commission in the Company's last base rate proceeding at Docket No. R-2022-3035730 and before the New York Public Service Commission at Case 16-G-0257 and Case 23-G-0627.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your testimony.

A. The purpose of my testimony is to discuss the labor market, retention and total rewards related to NFGDC's Pennsylvania Division ("National Fuel" or "Company").

Q. Are you sponsoring any exhibits or filing requirements in this proceeding?

A. Yes, CONFIDENTIAL National Fuel Exhibit VLH-1 (Annual Cash Bonus Program).

III. EMPLOYEE RECRUITMENT AND RETENTION

Q. What is the current employee count for National Fuel?

A. As of September 30, 2025, National Fuel employed 436 employees. These employees are geographically spread among 17 different locations within our northwestern Pennsylvania service territory.

Q. Are there any additional employees who contribute to National Fuel's operations?

A. National Fuel receives loaned labor from its affiliates when economically efficient and feasible to do so. For example, I provide Human Resources services to National Fuel even though I am an employee of NFGDC New York Division ("National Fuel – NY") and am located at corporate headquarters in Williamsville, NY. This allows National Fuel to benefit from the purchasing power of a larger corporate entity when negotiating benefit plan costs and also provides operating efficiencies with respect to recruitment, payroll and employee relations. This model of loaned labor eliminates the need for duplicate functions to be performed by separate administrative support functions like Human Resources, Information Technology, Accounting and Finance. This model also includes executive employees who have responsibilities across our corporate footprint, even if they are not physically located in NFGDC's Pennsylvania Division's geographic territory. National Fuel derives operational synergies provided by shared service departments and executives that National Fuel – NY and other subsidiaries provide. Controls are in place surrounding direct charging to and from these other subsidiaries.

Q. How do you define your employee population?

A. National Fuel employs two groups of Fair Labor Standards Act ("FLSA") non-exempt employees: those who are members of a collective bargaining unit ("union hourly") and those who are not affiliated with a collective bargaining unit ("non-union hourly"). Approximately 48% of the employees (over 66% of the FLSA non-exempt workforce) within National Fuel are represented by a bargaining unit. Those employees are represented by either the International Brotherhood of Electrical Workers, Local 2154-P,

also known as "IBEW" or the National Conference of Fireman and Oiler's, Chapter 22, also known as "F&O". Additionally, National Fuel employs two groups of FLSA exempt employees: salaried, non-executives ("salaried") and salaried executives ("executives"). As described in the prior section of my testimony, National Fuel derives the benefit of loaned executive labor (portions of labor allocated or direct charged) and operational synergies from executives located at National Fuel – NY and other subsidiaries. See table below for NFGDC's Pennsylvania Division employee counts.

Employee Type	Employee Count (9/30/2025)	Employee Count - FPFTY (10/31/2027)
Union Hourly	210	215
Non-Union Hourly	104	112
Salaried	122	123
Executive	0	0
TOTAL	436	450

Q. What assumptions are incorporated into the employee counts for the fully projected future test year?

A. Employee counts for the fully projected future test year ("FPFTY") ending October 31, 2027 take into account historic vacancy rates and have therefore been adjusted accordingly to 450 employees.

Q. What is the average length of service for your employee population?

A. Across all employee categories, the average length of service for employees at National Fuel is 8.75 years. See the table below for average length of service within each employee group. While overall, these averages have remained relatively stable, the Company experienced modest increases in length of service averages for the union hourly

and salaried employee groups compared to data provided in the Company's last rate filing.

Employee Type	Average Years of Service (as of 9/30/25)
Hourly	7.06
Non-Union Hourly	8.65
Salaried	11.76
Executive	N/A
TOTAL	8.75

Q. Are there different benefit offerings for these various employee groups?

A. Yes. Benefit offerings for the various employee groups are established based on the negotiation of labor contracts (where applicable) along with the Company's need to remain cost efficient yet competitive in the labor market. Certain benefit programs have also evolved over the years, most notably the elimination in 2003 of the defined benefit pension plan for new hires. As of September 30, 2025, only 4% of employees at National Fuel were eligible for the defined benefit pension plan.

Q. Does National Fuel hire often?

A. Yes. As average years of service at National Fuel have decreased over time, recruiting new hires to National Fuel is an important part of the Human Resources department's responsibilities. We must attract and retain talent through a competitive total rewards package which includes compensation and benefits, and a desirable work environment. Attracting and retaining qualified employees remains critical to National Fuel's continued ability to provide safe, efficient and cost-effective service to ratepayers. As of September 30, 2025, National Fuel had 18 open positions actively being recruited for or with known incumbents scheduled to start.

Q. What, if any, attraction challenges does National Fuel face?

A. Providing a competitive compensation and benefits package and ensuring this package meets the desires and demands of the labor market continues to be an ongoing area of emphasis for National Fuel. A competitive total rewards package is critical to attracting and retaining the most qualified individuals. The elimination in 2003 of the defined benefit pension plan for new hires has required National Fuel to continuously evaluate the competitiveness of the overall total rewards offered to various employee groups to be sure benefits offered are comparable to other companies. National Fuel competes for talent against companies within the energy industry as well as outside of the energy industry and offering competitive compensation and benefits at the start and throughout an employee's career is required to engage and retain top talent. Stability is no longer the primary driver for job seekers, and the attraction of working for a traditional utility company has seemed to evolve with time. Therefore, Human Resources must design, continually reassess, and offer competitive total rewards packages. These packages must be designed to incent individuals to consider National Fuel as an employer and ensure that we offer total rewards comparable to other companies. Continuing to provide a competitive total rewards package throughout an individual's employment with National Fuel is equally critical. These total rewards are designed to aid in the retention of top talent and to ensure stability within our workforce, continued transfer of knowledge and the opportunity for individuals to grow their expertise within the organization. Retention and workforce stability remains a critical focus for National Fuel since the average length of service across our workforce is 8.75 years, which is down from the average 11.80

years of service on September 30, 2015. Additionally, the changing nature and prevalence of remote work opportunities means National Fuel is competing for prospective talent beyond just local competitors.

Q. Has National Fuel experienced a change to employee complement?

A. National Fuel's headcount has evolved for a variety of reasons. First, there is a time lag that occurs when replacing individuals who terminate from National Fuel. A retiree who possessed many years of experience is not easily replaced with someone from the external labor market, and finding a suitable replacement often requires extensive recruiting time. But, since an overwhelming majority of employees are not in the defined benefit pension plan, lengthy notice periods prior to termination are no longer customary. Continuity of operations and succession planning challenges increase when employee departures are only predicated by a few weeks' advance notice. Because of this, the recruitment lag to replace someone generally surpasses the amount of transition time that occurs before someone departs National Fuel. Secondly, managing through the learning curve for new employees can contribute to the need for increased headcount. As new employees are building efficiency and other employees have to devote time to teaching and training, more resources may be required to perform work previously done by those with more experience and efficiency. Attrition can also lead to needing to have more employees trained in various areas so there are no gaps in the coverage needed to be provided. While cross training remains desirable for various reasons, it is equally important to retain individuals already trained to perform the work that needs to be done. The time it takes to identify, hire and adequately train a new hire to be productive places

additional strain on our remaining workforce. Therefore, we must continue to place emphasis on rewarding and retaining our existing workforce.

Q. How have these recruitment needs impacted employment costs at National Fuel?

A. The recruitment process has evolved alongside the complexity of the job market. This complexity introduces additional costs at various points throughout the process including advertising, screening/interviewing, potential agency placement fees, increased salary expectations and training costs. Specifically, scarce talent requires recruiters to spend additional time finding qualified applicants, as well as ensuring that the screening pool includes enough candidates to ensure viable options remain through the completion of the pre-employment process. Additionally, it is common for jobs to be reposted due to the scarcity of qualified talent mentioned above, which generally results in additional time and cost conducting interviews during the screening process. Additional costs are also incurred when advertising for job postings on various recruiting sites and through staffing agencies who charge a placement fee upon placement of a successful candidate. Starting salary expectations have continued to increase, both for inexperienced and experienced talent. There are additional costs associated with the training time incurred by managers in order to ensure new employees understand how to perform their function upon initial onboarding, as well as to regularly monitor and train new employees as they progress in their new role. As discussed in a previous question, there is also a cost element associated with the time spent by current employees and supervisors to cover open positions created when individuals exit the organization.

Q. How does National Fuel monitor employee engagement?

A. All employees are encouraged to share their feedback regarding job satisfaction informally with their managers or with the Human Resources department directly. There are also numerous formal channels in which feedback from salaried employees can be communicated. Those include annual performance appraisals, annual career conversations with executives, new hire evaluations sent by the Human Resources department at 6, 12, and 18 months of service, and through employee engagement surveys that are conducted periodically.

Q. How is National Fuel addressing retention as a measure of engagement?

A. National Fuel must offer a competitive total rewards package in order to retain our current workforce. If we fail to remain competitive in these areas, we will be unable to effectively manage attrition, which creates additional pressure on the current workforce and decreases the total amount of experience that exists within our remaining workforce. If we fail to maintain a market-competitive total rewards package, like those being offered by competitors, employees will resign, making it very difficult to manage replacement rates and the workload burden that inevitably falls to the staff that remains. It is critical to invest in the employees we have and be able to attract quality individuals to the vacancies currently available so that we can prevent burnout for employees, provide a productive work environment that encourages retention and ensure ratepayers are receiving safe, reliable and efficient service from an experienced workforce.

Q. What terms of compensation and benefits resulted from collective bargaining?

A. Negotiations with "F&O" recently took place for the employees represented by that collective bargaining unit. The resulting contract, which will go into effect May 1, 2026, included an average increase of 10% to hourly labor rates in the future test year and 10% to hourly labor rates in the fully projected future test year when all job categories are combined. Additionally, negotiations resulted in an updated 401(k) matching schedule, prescription drug coverage enhancements, the availability of a vision plan and longevity rewards. The terms of this labor contract are in effect through April 30, 2030. Negotiations with "2154" recently took place for the employees represented by that collective bargaining unit. The resulting contract, which will go into effect April 13, 2026, included an initial average increase of 13% to hourly labor rates in the future test year when all job categories are combined and an average increase of 3% to hourly labor rates in the fully projected future test year. Additionally, negotiations resulted in an updated 401(k) matching schedule, prescription drug coverage enhancements, the availability of a vision plan and longevity rewards. The terms of this labor contract are in effect through April 12, 2030.

Q. What other considerations result from collective bargaining?

A. Following the conclusion of negotiations and the ratification of bargaining agreements, the Company evaluates any corresponding impacts to other employees in the workforce. Specifically, the salaries of individuals managing the bargaining unit members are evaluated for compression issues, given the newly negotiated pay rates. It is critical to maintain an appropriate delta between pay rates for work performed at the hourly level

and salaries for those managing the hourly workforce. Not only does this distinction in salary ensure roles with increasing responsibility are appropriately compensated, it also preserves an important incentive for hourly employees who may want to be considered for promotional opportunities into salaried positions.

Q. Were there resulting financial impacts from this evaluation of pay rate compression?

A. Following the final ratification and activation of the collective bargaining agreements, the Company expects there will be a need to adjust the salaries of various salaried employees. There is expected to be approximately $145,000 of financial impact resulting from base salary adjustments within the salaried workforce.

Q. What rewards are used to remain competitive for non-union hourly talent?

A. Approximately 24% of National Fuel's employee complement is comprised of individuals performing administrative roles, in a non-union hourly capacity. These individuals staff the customer response center (i.e., call center) as well as provide administrative support services throughout various departments within National Fuel. The Company must provide competitive wages and benefits in order to attract and retain these critical employees and in order to remain on par with the wages and benefits offered by organized labor. In January 2026, a market-based wage adjustment for 94 non-union hourly employees, at an annual cost of approximately $526,000, went into effect. The Human Resources Department considered the differential in wage rates for administrative employees covered by a collective bargaining agreement in a different

jurisdiction in order to identify a more appropriate wage rate for the non-union hourly employee group. Following this market adjustment, all non-union hourly employees remained eligible for a January 2026 merit-based increase, from the 3.5% annual salary budget that had been established for this employee group. In response to increasing labor market demands for increased employee flexibility, a significant complement of non-union hourly employees are provided with the opportunity to work a hybrid or fully remote work schedule.

Q. What rewards are used to remain competitive for salaried (non-executive) talent?

A. National Fuel must offer compensation and benefits comparable to competitors in order to remain competitive in the labor market and to promote attraction and retention. A 4.75% annual salary budget was approved for 2026 merit and promotion increases. This projection is consistent with salary budget survey responses that are reported by individual organizations and consolidated by compensation specialists like WorldatWork and Willis Towers Watson. National Fuel evaluates the data provided by multiple external resources in order to develop salary budget recommendations that are both reasonable and market competitive. In 2022, "National Fuel – NY" engaged the services of an external consultant, Willis Towers Watson, to provide benchmarking data for salaried positions across National Fuel's affiliates. The confidential results provided by the external consultant in conjunction with further analysis conducted by the Human Resources department, resulted in numerous market adjustments for salaried employees at that time. Since then, National Fuel has strived to maintain market competitive pay by continuing to utilize external salary survey data to establish new hire salary offers,

evaluate existing salaries, age salary structures and recommend appropriate salary increase budgets.

Q. When did National Fuel implement an incentive-based compensation program?

A. Effective October 1, 2022, National Fuel established an Annual Cash Bonus Program. This Annual Cash Bonus Program is intended to provide greater incentive to the Company's salaried employees to work toward the achievement of the Company's business goals and objectives and enable the Company to attract, retain and motivate valuable employees. National Fuel's Annual Cash Bonus Program is described in CONFIDENTIAL National Fuel Exhibit VLH-1. Following an initial bonus payment in October 2022 to National Fuel's salaried employees as a first step towards this Annual Cash Bonus Program, the first full-year Annual Cash Bonus payment was made following the conclusion of the Company's 2023 fiscal year which on ended September 30, 2023.

Q. What impact does this incentive-based compensation program have in the Future Test Year ("FTY")?

A. As noted in National Fuel Exhibit ATF-4 Schedule 2 (pg. 2), the full-year expense for the Annual Cash Bonus Program projected to be incurred and recorded in the Company's FTY ended September 30, 2026 is $1,571,255.

Q. What is the expected cost of incentive-based compensation in the FPFTY?

A. Incentive-based compensation will be paid only if certain shared organizational goals are

achieved during each fiscal year. Shortly following the start of the fiscal year, specific goals are defined and are focused on metrics that provide customer benefits. The goals established for the program include customer service/satisfaction rates, operational safety measures, methane emissions reductions, employee safety (injury) rates and human capital/inclusion initiatives. In order to calculate the bonus payment, employee base salaries will be multiplied by the eligibility percentage for their grade level (level of experience or responsibility) in the organization and then multiplied by the goal achievement level. As noted in National Fuel Exhibit ATF-4 Schedule 2 (pg. 3), the projected O&M expense for National Fuel for the FPFTY is $1,645,889.

Q. What other benefits or rewards are utilized in the attraction or retention of salaried employees?

A. In addition to base salaries, stock-based compensation, in the form of time-vested restricted stock, is provided as a retention tool to select non-executive employees. These shares vest over three equal annual installments as service is provided to National Fuel. This benefit is included as part of the overall compensation package to retain high-caliber salaried employees while encouraging their investment in National Fuel, as it motivates recipients to remain employees throughout the vesting period. Given the increasing operational complexities and regulatory requirements experienced by utilities and energy companies, and the expanded efforts to modernize pipeline and distribution systems, a competitive compensation package encouraging retention and longevity, including time-vested restricted stock, is critical to the continued success of National Fuel and aligns with the interests of all stakeholders (including ratepayers, local communities,

employees, retirees, and shareholders). Finally, in response to significant employee demand and to address the needs of the labor market, National Fuel allows for hybrid work schedules, where possible. National Fuel must continue to adapt to the needs and demands of employees in order to remain competitive on both attraction and retention.

Q. What rewards are used to remain competitive for executive talent?

A. Given the increasing operational complexities and regulatory requirements experienced by utilities and energy companies and the expanded efforts to modernize pipeline and distribution systems, it is critical for National Fuel to remain competitive in its total rewards package provided to executives in order to retain quality and experience among the executive workforce for the benefit of all its stakeholders (including ratepayers, the local communities, employees, retirees, and shareholders). To that end, National Fuel's named executive pay practices are subject to an extensive review and approval process as outlined in National Fuel Gas Company's ("NFG") proxy statement. For officers not identified in the proxy, the review and approval process is similarly extensive. To assist in the effort, NFG's Compensation Committee retains the services of Korn Ferry Group, a nationally recognized firm that performs compensation analyses and reviews for companies in the energy and other business sectors. Key findings of the most recent national compensation data indicate that total compensation (base salary, annual and long-term incentives) for National Fuel's executives is at or below the median when compared with nationwide utility and general industry executives. Long-term incentives are provided via stock-based compensation. Incorporated into the projections for the FPFTY are performance shares linked to long-term performance from total shareholder

return, total return on capital and emission reduction targets as measured over a three-year period in comparison to peer companies. Another form of long-term incentive is the award of time vested restricted stock, which vest over three equal annual installments as service is provided to National Fuel. These forms of stock-based compensation encourage long-term perspective and performance from the management of National Fuel and encourage significant, personal investment. The financial success, as measured by long-term total shareholder return and long-term total return on capital of NFG (including National Fuel) is achieved through continued focus and commitment on numerous factors, which include efficiently investing in rate base, prudently operating the business, and providing safe, reliable, and affordable service to its customers. As a result, the utilization of performance shares to reward this focus and commitment is appropriate as it aligns with the interests of the ratepayers. Since time vested restricted stock vests in equal installments over a three-year period, it encourages recipients to remain employees over the vesting period and the utilization of time vested restricted stock is appropriate as it aligns with the interests of the ratepayers. The amounts related to these long-term incentive stock-based compensation awards are disclosed at National Fuel Exhibit MPW-1 Schedule 2, Pages 13 and 14.

Q. Does this conclude your direct testimony at this time?

A. Yes.

NATIONAL FUEL EXHIBIT VLH-1

CONFIDENTIAL

NO PUBLIC VERSION

NATIONAL FUEL STATEMENT NO. 5

MICHAEL P. WEIDNER

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 5

Direct Testimony of Michael P. Weidner

Topics Addressed: Benefits Including Retirement

Dated: January 28, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Michael P. Weidner. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. By whom and in what capacity are you employed?

A. I am employed by National Fuel Gas Distribution Corporation ("NFGDC") in the position of Senior Director within the Human Resources department.

Q. Please provide your educational background.

A. I graduated from St. Bonaventure University, in May 1998 with a Master of Business Administration Degree and Bachelor of Business Administration Degree, concentrating in Accounting and Finance.

Q. Please provide your professional experience.

A. In September 1998, I joined Ernst & Young, LLP as a Staff Accountant and I was promoted to Senior Accountant in 2000. I have been a Certified Public Accountant since December 1999. I began my employment with NFGDC in October 2000 in the Audit Services department. In July 2005, I transferred to the Financial Accounting department where I became Manager in September 2013. In February 2018, I was promoted to my current position.

Q. Have you previously testified in other proceedings before the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission") or any other state or federal agency?

A. Yes, I have testified before the PAPUC (NFGDC Supplement No. 228 to Tariff Gas – Pa.P.U.C. No. 9 – Docket Nos. R-2021-3027406 and C-2021-3028654 (collectively the "2021 OPEB Dockets"), as well as Docket No. R-2022-3035730 (the "2022 Rate Case"). I have also testified before the New York Public Service Commission in Cases 16-G-0257 and 23-G-0627.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your testimony.

A. The purpose of my testimony is to discuss the costs related to the employee benefits package for NFGDC's Pennsylvania Division ("National Fuel" or the "Company").

Q. Are you sponsoring any exhibits or filing requirements in this proceeding?

A. I am sponsoring National Fuel Exhibit MPW-1, Schedules 1 and 2. I am also responding to various Standard Data Requests.

III. EMPLOYEE BENEFITS EXPENSE

Q. Please describe National Fuel Exhibit MPW-1 Schedule 1 (Benefits) and Schedule 2 (Benefits) - Pages 1-16.

A. The exhibit and schedules show the adjustment to National Fuel's operation and maintenance ("O&M") expense for employee benefits. National Fuel Exhibit MPW-1,

Schedule 1 summarizes these adjustments. I will describe the adjustments in further detail.

A. Retirement Benefits

Q. Are there any retirement related benefits in the exhibits?

A. Yes, NFGDC's parent company National Fuel Gas Company ("NFG") has Annuity benefits (otherwise known as Defined Benefit Pensions) and Other Post-Employment Benefits ("OPEBs"), which were closed to new participants in 2003. NFG also has Tax Deferred Savings Plans (i.e., 401(k)), and contributions to Retirement Savings Accounts ("RSA"), which are accounts set up within the Tax Deferred Savings Plans ("TDSP") for those employees that were hired after Defined Benefit Pensions were no longer offered to new entrants. See Table 1 below for the number of the Company's participants in the Defined Benefit Pensions, TDSPs, RSAs, and OPEBs.

Table 1: Retirement Benefit Participants (2025)

Normalized Participants	Annuity	TDSPs	RSAs	OPEBs
Eligible Active Participants	23	436	417	23
Inactive Participants	499	75	48	335
Total	522	511	465	358

NFG and the Company have made strides in minimizing retirement-related costs, resulting in lower O&M expense for employee benefits. Specifically, NFG (including the Company) has prudently managed the assets set aside for Defined Benefit Pensions and OPEBs and has taken steps to control costs. These steps have led to the Company not requesting any rate recovery for Defined Benefit Pension or OPEB costs in this rate case.

Q. Are any applicable costs associated with these retirement benefits included in any exhibits?

A. Yes, these costs are covered in National Fuel Exhibit MPW-1 (Benefits) Schedule 2 - Pages 5-6 (401(k)), Pages 9-10, and Pages 11-12 (RSA), but as noted above there is no requested rate recovery.

Q. Please explain the adjustment to National Fuel Exhibit MPW-1, Schedule 2 (Benefits) - Pages 9 - 10.

A. This section adjusts the Company's O&M expense for the cost of the Defined Benefit Pensions (i.e., annuity benefits), which are based on the level of contributions made during the fiscal year. For the historic test year ended September 30, 2025 ("HTY"), the normalized defined benefit pension expense was zero. This was based on the fiscal year allocation contributions and a 73.14% factor (see Direct Testimony of Anthony Formato, National Fuel Statement No. 3) used to determine the amounts to be expensed (herein referred to as "Factor A"). Even though there were contributions within the prior three years, calculating a forward-looking rate request for annuity benefits based on historic contributions would be inappropriate. As a result, based on the projected level of contributions, the forecasted expense during the fully projected future test year ending October 31, 2027 ("FPFTY") is expected to remain zero.

Q. What OPEBs do NFG and the Company currently provide?

A. OPEBs refer to benefits provided to retirees other than pensions. The Company currently provides medical coverage for substantially all employees hired prior to January 1, 2003,

and to a few union employees hired prior to November 1, 2003. The Company also provides prescription drug coverage and life insurance benefits.

Q. Aside from prudent asset management, have NFG and the Company taken any steps to control future OPEB costs?

A. Yes. In January 2003, NFG and the Company implemented a change to the eligibility criteria for OPEBs, whereby non-union employees hired after on or after January 1, 2003, and union employees hired on or after November 1, 2003 are no longer eligible for any retiree medical, prescription drug or life insurance benefits. These actions were purely a cost savings measure. As a result of this cost savings measure and prudent management of the assets set-aside for OPEBs, the Company was in a position to reduce rate recovery of OPEBs to zero in conjunction with its filing in the 2021 OPEB Dockets and continue zero rate recovery in the 2022 Rate Case. In addition, in the 2021 OPEB Dockets, the Company set forth a plan to pass back $54.0 million to ratepayers from 2021-2026 using grantor trust assets, which would further reduce its regulatory liability, which is discussed later in my testimony.

Q. What is the Company's requested OPEB recovery?

A. Consistent with its filing in the 2021 OPEB Dockets and with the settlement in the 2022 Rate Case, National Fuel is continuing to request no OPEB recovery. Additionally, the Company has $6.7 million of funds remaining in the Grantor Trust, which is discussed further below. For accounting and financial reporting purposes, National Fuel records OPEB expense or income in accordance with Accounting Standards Codification No. 715

(formerly known as Statement of Financial Accounting Standards No. 106 "SFAS 106") as determined by its actuary, which is consistent with the Company's historical practice. For the HTY, the net SFAS 106 income was $1,558,903. As the Company is continuing to set its OPEB rate recovery at zero, an adjustment of $1,558,903 million was made to accomplish this.

Q. Does the Company have a remaining OPEB regulatory liability?

A. After the completion of the aforementioned scheduled pass back of grantor trust assets referenced in the 2021 OPEB Dockets, the remaining OPEB regulatory liability will be $44.8 million.

Q. Does the Company have funds set aside to cover this liability?

A. The Company has Voluntary Employees' Beneficiary Association ("VEBA") trusts and a 401(h) account. As of September 30, 2025, the end of the Company's most recently audited fiscal year, the value of the assets in the VEBA trust and 401(h) account in excess of OPEB liability owed to the retirees was $46.9 million, which exceeds the regulatory liability of $44.8 million. This balance is expected to remain after the scheduled pass back of grantor trust assets. However, interest rates (used to calculate the OPEB liability) and investment performance (which would impact the value of the VEBA trust and 401(h) account) will change resulting in subsequent changes to amount of the excess assets. Unlike the aforementioned grantor trust assets, these assets can currently only be used to pay benefits to retirees and related administrative costs, so they are not available to ratepayers to cover the regulatory liability.

Q. Is the Company proposing to address the remaining regulatory liability at this time?

A. The Company is proposing to utilize the remaining grantor trust assets to provide a one-year surcredit of $6,700,000 to the ratepayers during the FPFTY as a continued measure to mitigate rate increases and promote affordability for ratepayers. This proposal and its impact on customers is discussed further in the Direct Testimony of Courtney T. Mann in National Fuel Statement No. 14.

Q. Outside of prudent management of assets set aside for Defined Benefit Pensions, have NFG and the Company taken any steps to control future Pension costs?

A. As discussed above, NFG and the Company closed participation in Defined Benefit Pensions to new participants in 2003. Employees who were already eligible for Defined Benefit Pensions continue to accrue pension benefits, while employees hired after that were offered employer contributions in a RSA, which was set up as an additional benefit within the 401(k) plans. Employees eligible for the Defined Benefit Pensions do not have this RSA benefit within the 401(k) plans. Eligible RSA employees who have provided less than six years of service are given an employer contribution equal to 3% of their base salary or wages to the RSA, while employees who have more service are given an employer contribution of 4% of their base salary and wages to the RSA.

Q. Please explain the adjustment to National Fuel Exhibit MPW-1, Schedule 2 (Benefits) - Pages 11 - 12.

A. This section adjusts the Company's O&M expense for the cost of the RSA benefit. I calculated the Company's weighted average RSA contribution percentage and multiplied it by the compensation subject to RSA across the different labor groups. The increase in compensation and incremental headcount is then projected across these labor classifications out to the FPFTY, and the current weighted average RSA contribution percentage is applied to calculate the projected RSA Company contribution of $1,383,497. Given that RSA contribution levels are based on the compensation levels to which the RSA contribution percentage would be applied, it would be inappropriate to use historical RSA expense (for example, a three-year average) to establish the requested rate recovery. The $1,383,497 projected contribution was multiplied by Factor A to calculate the amount charged to O&M expense of $1,011,890. This amount is $261,839 greater than the expense recorded on the general ledger for HTY, and $197,468 greater than the normalized September 2025 expense. I further note that Pages 11-12 of this exhibit provide a breakdown of the compensation subject to employer RSA contribution along with the RSA contributions across the union, non-union and salaried employee labor groups and across the projection periods.

Q. Please explain the adjustment to 401(k) expense on National Fuel Exhibit MPW-1, Schedule 2 (Benefits) - Pages 5 - 6.

A. This section adjusts the Company's O&M expense for the FPFTY for the cost of the 401(k) Plan. The projected 401(k) expense was determined using the participants who are currently contributing to the 401(k), since only those would receive the employer match, across all labor classifications to determine the compensation subject to 401(k)

employer match and the weighted average employer match percentage. The increase in compensation is then projected across these labor classifications through the FPFTY, the estimated impact of incremental employees, and the current weighted average employer match percentage is applied to calculate the projected 401(k) employee match of $1,504,740. Given that 401(k) employer match levels are based on the compensation levels to which the match percentages are applied, it would be inappropriate to use historical 401(k) expense (for example, a three-year average) to establish the requested rate recovery. This $1,504,740 of projected 401(k) employer match was multiplied by Factor A to calculate the amount charged O&M expense of $1,100,567 for the FPFTY. This amount is $202,097 greater than the expense recorded on the general ledger for the HTY, and $219,584 greater than the normalized September 30, 2025 expense. I further note that pages 5 - 6 of this exhibit provide a breakdown of the compensation subject to employer matching contribution along with the matching contributions across the union, non-union and salaried employee labor groups and across the projection periods.

B. <u>Non-Retirement Benefits</u>

Q. Are there any non-retirement related benefits in any of your exhibits?

A. Yes, the Company offers Group Life Insurance, Hospitalization (i.e., medical and prescription drug coverage), Dental, Stock-Based Compensation, and other miscellaneous benefits. These costs are covered in National Fuel Exhibit MPW-1, Schedule 2 (Benefits) - Pages 1-2 (Group Life), Pages 3-4 (Hospitalization), Pages 7-8 (Dental), and Pages 13-14 (Stock-Based Compensation). In addition, as the Company borrows time from other affiliated subsidiaries, their benefits are charged to the Company in proportion to the time borrowed, which is discussed in National Fuel Exhibit MPW-1, Schedule 2 (Benefits) -

Page 15-16. It should be noted that since Stock-Based Compensation is an integral part of employee retention (including executives), the Company's claim for this expense is discussed in the Direct Testimony of Valerie Hawthorn Wagner (National Fuel Statement No. 4).

Q. Please explain the adjustment to Group Life Insurance on National Fuel Exhibit MPW-1, Schedule 2 (Benefits) - Pages 1 - 2.

A. The Company provides Term Life Insurance and Accident, Dismemberment and Disability ("AD&D") Insurance for its management and union employees. The Term Life Insurance rate is $0.72 per $1,000. This rate is effective through December 31, 2027. Salaried employees' coverage is two times their salary and hourly non-supplemental employees' coverage is $50,000 per person. Supplemental hourly employees' coverage is $25,000 per person. The AD&D insurance rate is $0.02 per $1,000 and is based on the same calculation described above. However, not everyone who receives term insurance receives AD&D. National Fuel also carries a blanket travel plan for which the premium is $110 per month.

During the HTY the total gross monthly and annual costs of these three plans are $2,838 per month or $34,056 annually. After reflecting the projected number of participant employees for the FPFTY, the annual costs are projected to be $35,352 during the FPFTY. Multiplying the total gross annual amount of the three plans by Factor A, results in $25,856 of O&M expense for the plans during the FPFTY. The Officer Life Insurance O&M expense of $26,532 during the FPFTY is then added for a total Group Life Insurance amount to O&M expense of $52,388 during the FPFTY. This amount is

$662 lower than the expense recorded on the general ledger for the HTY, and $948 greater than the normalized expense as of September 30, 2025. Given that the Company entered into new Term Life and AD&D rates in January 2025, it is appropriate to use these forward-looking projections rather than historical expense amounts (for example, a three-year average).

Q. Please explain the adjustment to Hospitalization expense on National Fuel Exhibit MPW-1, Schedule 2 (Benefits) - Pages 3 - 4.

A. This adjustment is for hospitalization expense. Hospitalization expense includes three components: (1) health insurance, (2) a Company provided wellness program, and (3) prescription drug coverage. I will discuss each of these components in turn.

Q. Please explain how you adjusted the Company's claim for Hospitalization expense for the cost of health insurance.

A. To adjust the cost of the self-insurance of health benefits for the FPFTY, I started with the cost of claims not including administrative fees paid per employee per month for the HTY (i.e., $1,304.84). With healthcare costs, in the absence of significant changes in population which might dramatically alter the per employee healthcare spending (for example, the population getting significantly younger or older), starting with the most recent year (i.e., the HTY) is the most appropriate starting point to use in predicting the increase in claims paid from the FPFTY. Then, based on the actual level of increases experienced from the HTY versus the 12 months ended September 30, 2024, I increased the level of claims paid for the HTY by 10.90% to reach an FTY amount of $1,447.07 per

employee per month. I then applied this annualized 10.90% (plus the 0.91% to take account the link month of October 2026) increase to the FTY amount to produce an expected level of claims paid per employee per month of $1,619.41 for the FPFTY. I then added an administrative cost of $69.97 per employee per month from Highmark BCBS to produce a total cost of $1,689.38 per employee per month. This amount was then multiplied by the number of participating active employees projected for the FPFTY to calculate the monthly amount of $653,789. This amount is multiplied by 12 for a total of $7,845,465 during the FPFTY.

Q. Please explain how you adjusted the Company's claim for Hospitalization expense for the costs of the Wellness Program.

A. The Company's wellness program had an actual expense $4,476 during the HTY, which assumed would be the expense for the FPFTY.

Q. Please explain how you adjusted the Company's claim for Hospitalization expense for the costs of prescription drug coverage.

A. The Caremark CVS Carved-Out Pharmacy Prescription Drug Benefit rate per employee was increased similar to the health insurance rate per employee. I started with the actual level of claims paid without administration fees per employee for the HTY (i.e., $216.13). This amount will be a good predictor of the increase in claims paid for the FPFTY. Then, based on the actual level of increases (or in this case decreases) experienced from the HTY versus the 12 months ended September 30, 2024, I decreased the level of claims paid for the HTY by 12.94% to reach an FTY amount of $188.16 per

employee per month. I then applied this 12.94% decrease (plus a 1.08% decrease to account for the link month of October 2026) to the FTY amount to produce an expected level of claims paid per employee per month of $162.04 for the FPFTY. I then added $4.12 per employee per month of administrative costs from Caremark CVS to produce a total cost of $166.16 per employee per month during the FPFTY. This was then multiplied by the number of participating employees projected for the FPFTY to calculate the monthly amount of $36,388. This amount is multiplied by 12 for a total of $436,656 during the FPFTY.

Q. What is the total annual cost of the Company's health insurance, wellness program, and prescription drug coverage benefits?

A. The total projected annual cost for these health care programs is $8,286,897. The total projected annualized supervisory and weekly contributions towards Hospitalization were subtracted to arrive at a total cost of $6,528,710. This was multiplied by Factor A to calculate the amount to be charged to O&M expense of $4,775,099 for the FPFTY. This amount is $903,189 greater than the expense recorded on the general ledger for the HTY, and $914,283 greater than the normalized HTY.

Q. Is the methodology used to calculate Hospitalization expense, including the Company's wellness program and prescription drug coverage benefits, for the FPFTY consistent with the Company's prior rate cases with the PAPUC?

A. Yes, it is the same methodology used in previous rate cases with the PAPUC, and it recognizes the impact of inflationary healthcare trends that organizations across the

United States experience. Using current healthcare costs and applying recent trend data (as opposed to historical averages) are better predictors of future costs. As such, the Company's methodology for calculating Hospitalization expense is appropriate.

Q. Please explain the adjustment on National Fuel Exhibit MPW-1, Schedule 2 (Benefits) - Page 7 - 8.

A. This part of the exhibit shows the calculation of the adjustment of the Dental Expense Benefit provided by the Company. The calculation starts with actual gross amount of dental benefits expense incurred during the HTY and the previous two years of $222,772. Unlike other benefits, dental expense is not influenced by compensation levels of the participants or healthcare inflationary trends, and as a result the use of a three-year historical average for establishing a rate recovery is appropriate. I decreased the $222,772 by the annualized level of employee contributions of $47,236 (which was calculated using the average employee contributions from the HTY and previous two years), which produced net dental costs of $175,536 during the HTY. I then multiplied this amount by Factor A to determine the amount of the O&M expense associated with the Dental Expense Benefit of $128,387 for the FTY and FPFTY. This amount is $19,241 lower than the expense recorded on the general ledger for the HTY.

Q. Please explain the adjustment to National Fuel Exhibit MPW-1, Schedule 2 (Benefits) - Pages 13 - 14.

A. This part of the exhibit calculates the adjustment for stock-based compensation to be the amount being claimed for the FPFTY. The use of historical data (i.e., three-year

averages) for calculating requested rate recovery for stock-based compensation is deemed to be appropriate given that these benefits are not impacted by factors that would impact other benefits such as compensation levels impacting RSA expense/401(k) expense or healthcare inflationary trends impacting Hospitalized expenses. The historical stock-based compensation expenses recorded to O&M expense from the HTY and the two previous years were used to calculate the average of $1,429,959, which was used for the FTY and FPFTY. This amount is $123,312 higher than the amount recorded for the HTY and normalized HTY.

Q. Please explain the adjustment to National Fuel Exhibit MPW-1, Schedule 2 (Benefits) - Pages 15 - 16.

A. This part of the exhibit calculates the adjustment for benefit charges associated with labor charged from NFGDC's New York Division ("National Fuel – NY") and other NFG subsidiaries to the amount being claimed for the FPFTY. For benefit charges associated with labor charged from National Fuel – NY, I used the per book HTY number of $778,446 instead of a three-year average. I used the HTY number as the basis for benefit charges from National Fuel – NY because the NY employee benefits costs recently changed in accordance with a settlement with the New York Public Service Commission in Case 23-G-0627. Due to the settlement, National Fuel – NY's employee benefit costs were updated effective October 2024, which affects the costs charged to PA division for loaned labor. As a result, it is appropriate to use the HTY for requested rate recovery in this case, but not a three-average of the HTY and previous two years. With regards to the benefits associated with labor charged from other subsidiaries, it is appropriate to use a

three-year average since there was no recent rate case in those jurisdictions that would cause the HTY to be any more predictive than the three-year average. As such, I calculated an average of these expenses from the HTY and the two previous years of $409,014 and used this average for the FTY and FPFTY. This amount is $24,381 lower than benefit charges recorded from other subsidiaries, for the HTY.

Q. Does this conclude your direct testimony at this time?

A. Yes.

NATIONAL FUEL EXHIBIT MPW-1

EMPLOYEE BENEFITS

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits
Workpaper For Cost Element - Employee Benefits

Exhibit No. MPW-1
Schedule 1 (Benefits)
Witness: Weidner
Page 1

	TME 9/30/2025 Per Books	Normalizing Adjustments	HTY TME 9/30/2025
Group Life Insurance	$53,051	($1,610)	$51,440
Hospitalization Insurance	3,871,910	(11,094)	3,860,816
401(K) Plan	898,470	(17,487)	880,983
Dental Plan	147,628	(4,422)	143,206
Annuity	0	0	0
Post Retirement Benefits	(1,558,903)	1,558,903	0
Retirement Savings Account	750,051	64,371	814,422
Stock Based Compensation	1,306,647	0	1,306,647
Miscellaneous	(183,415)	0	(183,415)
Benefits From New York	778,446	0	778,446
Benefits From Other Subs	433,394	0	433,394
	$6,497,279	$1,588,661	$8,085,939

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Exhibit No. MPW-1
Schedule 1 (Benefits)

Witness: Weidner

Workpaper For Cost Element - Employee Benefits

Page 2

	FTY TME 9/30/2026	Adjustments	Rate Year TME 10/31/2027
Group Life Insurance	$52,388	$0	$52,388
Hospitalization Insurance	4,282,559	$492,540	4,775,099
401(K) Plan	991,550	$109,017	1,100,567
Dental Plan	128,387	$0	128,387
Annuity	0	$0	0
Post Retirement Benefits	0	$0	0
Retirement Savings Account	921,727	$90,163	1,011,890
Stock Based Compensation	1,429,959	$0	1,429,959
Miscellaneous	(188,102)	($0)	(188,102)
Benefits From New York	778,446	$0	778,446
Benefits From Other Subs	409,014	$0	409,014
	$8,805,928	$691,720	$9,497,648

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Group Life Insurance
Twelve Months Ended Sept. 2025 and Twelve Months Ending Sept. 2026

	Historic Test Year Sept 2025			Future Test Year Sept. 2026		
Term Insurance Rate Note 1	$0.072			$0.072		
Term Insurance Volume (Calculation below)	30,205	$2,175		31,242	$2,249	
AD & D Insurance Rate Note 1	$0.020			$0.020		
AD & D Insurance Volume (Calculation below)	27,655	553		29,344	587	
Blanket Travel - Per Month		$ 109.97			109.97	
Total Monthly Gross Premium		$2,838			$2,946	
Gross Normalized Group Life Insurance (x 12)			$34,056			$35,352
Amount to be charged to Operations and Maintenance Expense	73.14%		$24,908	73.14%		$25,856
Officer Life Insurance - Per Book			$26,532			$26,532
Total Group Life Insurance			$51,440			$52,388

Volume Calculation at	Sept 2025	Sept. 2026
Basic Life-participants	233	241
Basic Life-$ Volume	30,205	31,242
AD&D-participants	131	139
AD&D-$Volume	27,655	29,344

Note: Assumes 8 incremental employee hired during fiscal 2026 and an additional 6 hired in fiscal 2027. Also, premium rates decreased from prior years, so using a 3-year average is inappropriate

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Group Life Insurance
Link Month Oct. 2026 and Twelve Months Ending Oct. 2027

	Link Month 10/31/2026			Rate Year TME 10/31/2027		
Term Insurance Rate Note 1	$0.072			$0.072		
Term Insurance Volume (Calculation below)	31,242	$2,249		31,242	$2,249	
AD & D Insurance Rate Note 1	$0.020			$0.020		
AD & D Insurance Volume (Calculation below)	29,344	$ 587		29,344	$ 587	
Blanket Travel - Per Month		109.97			109.97	
Total Monthly Gross Premium		$2,946			$2,946	
Gross Normalized Group Life Insurance Annualized (x 12)			$35,352			$35,352
Amount to be charged to Operations and Maintenance Expense	73.14%		$25,856	73.14%		$25,856
Officer Life Insurance - Per Book			$26,532			$26,532
Total Group Life Insurance			$52,388			$52,388

Volume Calculation at	Oct. 2026	Oct. 2027
	247	247
	31,242	31,242
	145	145
	29,344	29,344

National Fuel Gas Distribution Corporation
Pennsylvania Division
Calculation of Medical and Prescription

Exhibit No. MPW-1
Schedule 2 (Benefits)
Witness: Weidner
Page 3-4 Workpaper

Medical

Month	Paid Claims / Stop Loss	Enrolled	Paid Claims/ Enrolled		Base Rate Rolling 12 Months			Non-Enrollment Admin Fees	Enrollment Admin Fees
September-24	$ 317,370	366	$ 867		$ 1,177			$ 3,799	$ 21,915
October-24	$ 398,281	365	$ 1,091		$ 1,167			$ 3,818	$ 21,915
November-24	$ 605,925	364	$ 1,665		$ 1,221			$ 3,811	$ 11,685
December-24	$ 493,859	369	$ 1,338		$ 1,221			$ 3,911	$ 22,151
January-25	$ 393,535	379	$ 1,038		$ 1,241			$ 3,889	$ 19,819
February-25	$ 456,790	380	$ 1,202		$ 1,236			$ 1,763	$ 24,359
March-25	$ 412,021	376	$ 1,096		$ 1,211			$ 6,087	$ 24,106
April-25	$ 447,152	377	$ 1,186		$ 1,220			$ 3,985	$ 24,002
May-25	$ 554,367	376	$ 1,474		$ 1,229			$ 3,933	$ 23,938
June-25	$ 601,766	375	$ 1,605		$ 1,270			$ 3,926	$ 23,875
July-25	$ 338,796	379	$ 894		$ 1,232			$ 3,961	$ 23,960
August-25	$ 646,061	375	$ 1,723	Annual %	$ 1,264	Annual 12-Month Rolling %		$ 3,923	$ 23,708
September-25	$ 507,586	373	$ 1,361	56.9%	$ 1,305	10.9%		$ 3,905	$ 23,581
				Annual Rate at September 2025		10.90%		$ 46,912	$ 267,098
								TME Admin	$ 314,011
Base Rate at HTY September 2025				1,304.84				TME Enrolled	4,488
								Avg Admin TME	$69.97
September 2025 annualized				$1,304.84					
Administrative				69.97					
Total HTY				$1,374.81	HTY				
Base Rate Annualized at September 2025				$1,304.84					
Increase to provide September 2026				10.90%	annual increase	Base Rate Claims	Admin	Total FTY September 2026	
Base Rate at FTY September 2026				$1,447.07	FTY	$1,447.07	69.97	$1,517.04	
Increase to provide October 2026				0.91%	1/12 annual increase	Base Rate Claims	Admin	Link Month October 2026	
						$1,460.24	69.97	$1,530.21	
Base Rate at October 2026				$1,460.24	Link Month				
Increase to provide October 2027 annualized				10.90%	annual increase				
October 2027 annualized				$1,619.41					
Administrative				69.97					
Total October 2027 annualized				$1,689.38	Rate Year				

Prescription

Month	Paid Claims	Employees	Paid Claims/ Employee		Base Rate Rolling 12 Months		Admin Fees
September-24	$ 29,349	200	146.74		248.24		231.55
October-24	$ 24,880	199	125.03		235.63		987.64
November-24	$ 59,174	199	297.36		240.45		435.61
December-24	$ 24,810	199	124.68		220.83		375.82
January-25	$ 45,783	207	221.17		212.78		274.04
February-25	$ 49,721	211	235.64		210.61		1016.94
March-25	$ 27,477	209	131.47		194.39		3647.01
April-25	$ 60,356	211	286.05		201.70		736.76
May-25	$ 58,056	211	275.15		208.00		840.12
June-25	$ 43,719	211	207.20		205.46		640.7
July-25	$ 71,677	213	336.51		219.64		491.33
August-25	$ 31,888	209	152.57	Annual 12-Month Rolling %	212.54	Annual %	505.42
September-25	$ 39,329	205	191.85	30.7%	216.13	-12.94%	171.92
				Annual Rate at September 2025		-12.94%	
Base Rate at HTY September 2025					216.13		
September 2025 annualized					$216.13		
Administrative					4.12		
Total HTY					$220.25	HTY	
Base Rate Annualized at September 2025					$216.13		
Increase to provide September 2026					-12.94%	annual decrease	
Base Rate at FTY September 2026					$188.16	FTY	
Administrative					4.12		
Base Rate at FTY					192.28		
Increase to provide October 2026					-1.08%	1/12 annual increase	
Base Rate at October 2026					$186.13	Link Month	
Administrative					4.12		
Increase to provide October 2027 annualized					190.25		
Increase to provide October 2027 annualized					-12.94%	annual decrease	
October 2027 annualized					$162.04		
Administrative					4.12		
Total October 2027 annualized					$166.16	Rate Year	

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Hospitalization Expense
Twelve Months Ended Sept. 2025 and Twelve Months Ending Sept. 2026

	Historic Test Year Sept 2025		Future Test Year Sept. 2026	
Health Insurance				
Annualized Rate per employee	$1,374.81		$1,517.04	
Participating active employees in health care plans - see Note (2)	373		381	
Gross (Monthly x 12)	512,803	$6,153,635	577,991	$6,935,892
Wellness Program				
Annual Gross Premium		4,776	0.00%	4,776
Carved Out Pharmacy Prescription Drug Benefits				
Annualized Rate per employee	$220.25		$192.28	
Participating active employees in health care plans Note (1) and (2)	205		213	
Gross (Monthly x 12)	45,150	541,803	40,955	491,455
Gross Normalized Hospitalization Cost		6,700,214		7,432,123
less: Supervisory Contribution		427,771		474,500
less: Hourly Contribution		993,777		1,102,334
Total Gross Normalized Hospitalization Costs		$5,278,665		$5,855,289
Amount to be charged to Operations and Maintenance Expense	73.14%	$3,860,816	73.14%	$4,282,559

Note (1) Certain Union employees have health insurance that includes pharmaceutical coverage (i.e. it's not carved out). In addition, Permanent Part Time employees do not receive pharmaceutical coverage.

Note (2) Assumes 8 incremental employees hired during fiscal 2026 and another 6 in fiscal 2027

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Hospitalization Expense
Link Month Oct. 2026 and Twelve Months Ending Oct. 2027

	Link Month 10/31/2026		Rate Year TME 10/31/2027	
Health Insurance				
Annualized Rate per employee	$1,530.21		$1,689.38	
Participating active employees in health care plans - see Note (2)	387		387	
Gross (Monthly x 12)	592,190	$7,106,280	653,789	$7,845,465
Wellness Program				
Annual Gross Premium		4,776		4,776
Carved Out Pharmacy Prescription Drug Benefits				
Annualized Rate per employee	$190.25		$166.16	
Participating active employees in health care plans Note (1) and (2)	219		219	
Annual Gross (x 12)	41,664	499,964	36,388	436,656
Gross Normalized Hospitalization Cost		7,611,020		8,286,897
less: Supervisory Contribution for Twelve Months		485,921		529,072
less: Union Contribution for Twelve Months		1,128,868		1,229,114
Total Gross Normalized Hospitalization Costs		$5,996,231		$6,528,710
Amount to be charged to Operations and Maintenance Expense	73.14%	$4,385,643	73.14%	$4,775,099

Note (1) Certain Union employees have health insurance that includes pharmaceutical coverage (i.e. it's not carved out). In addition, Permanent Part Time employees do not receive pharmaceutical coverage.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DISTRIBUTION
401(K) COMPANY MATCH
PROJECTED
CONFIDENTIAL

Exhibit No. MPW - 1
Schedule 2 (Benefits)
Witness: Weidner
Page 5 & 6 Workpaper
CONFIDENTIAL

	Non Union Hourly Employees	Annual 401(k) Co. Match	Salaried Employees	Annual 401(k) Co. Match	Union Employees	G Annual 401(k) Co. Match	Total	401(k) Company Match	
As of 9/2025	98	-	121	-	124		343	1,225,192	GL Balance at Sep. 2025
								-	
Compensation Subject to Match (Based on Current Contributing Participants)	5,409,664		13,714,704		8,981,086				
Weighted Avg Match %	3.0%		5.7%		3.0%				
Projected Company Match	-	161,413	-	776,305	-	266,798		1,204,515	Twelve Months Ended Sep. 2025 Normalized
		-		-		-			
Compensation Subject to Match (Based on Current Contributing Participants)	6,100,450		14,347,295		9,810,213				
Weighted Avg Match %	3.0%		5.7%		3.5%				
Projected Company Match	-	181,836 **A**	-	812,112 **C**	-	344,368 **E**		1,338,316	Twelve Months Ending Sep. 2026
		-		-		**Impact of Incremental Employees**		**17,371**	
Compensation Subject to Match (Based on Current Contributing Participants)	6,177,204		14,417,583		9,902,338			**1,355,688**	**Twelve Months Ending Sep. 2026**
Weighted Avg Match %	3.0%		5.7%		3.6%				**(with Incremental Employees)**
Projected Company Match	-	184,105	-	816,091	-	355,923		1,356,119	Link Month Oct. 2026
		-		-		Impact of Incremental Employees		17,491	
Compensation Subject to Match (Based on Current Contributing Participants)	6,541,736		15,134,419		10,458,126			**1,373,610**	**Link Month Oct 2026 (with**
Weighted Avg Match %	3.0%		5.7%		4.0%				**Incremental Employees)**
Projected Company Match	-	194,932 **B**	-	856,667 **D**	-	419,793 **F**		1,471,391	Twelve Months Ending Oct. 2027
		-		-		**Impact of Incremental Employees**		**33,349**	

Note: Assumes 8 incremental employee hired during fiscal 2026 and an additional 6 hired in fiscal 2027.
Per National Fuel Exhibit ATF-4, Schedule 5, the average compensation of the incremental employees for the FTY is $53,609 and $62,658 for the FPFTY.

1,504,740 **Twelve Months Ending Oct. 2027 (with Incremental Employees)**

A Projecting an [redacted]% increase for Non-Union Hourly (except for the few exempt employees that receive a [redacted] increase) effective 1/1/2026. This represents an approximate $[redacted] base pay adjustment plus annual increases

B Projecting a [redacted] increase for all Non-Union hourly effective 1/1/2027

C Projecting a [redacted] increase for Supervisory employees effective 1/1/2026. This represents an approximate $145,000 salary adjustment

D Projecting a [redacted] increase for Supervisory employees effective 1/1/2027

E Projecting a [redacted] increase for 2154P Union employees and a 10% increase for F&O Union employees effective 1/1/2026

F Projecting a [redacted] increase for F&O Union employees effective 11/1/2026, a [redacted] increase for F&O Union employees 5/1/2027 and a [redacted] increase for 2154P Union employees 4/15/2027

G Projecting an adjustment to matching schedule effective 4/1/2026 to align with recent union agreements in NY jurisdiction.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

401(K) Plan Company Payment
Twelve Months Ended Sept. 2025 and Twelve Months Ending Sept. 2026

Company Payment		Historic Test Year Sept 2025	Future Test Year Sept. 2026
401(K) Gross Union		$ 266,798	$ 344,368
401(K) Gross Hourly		161,413	181,836
401(K) Gross Supervisory		776,305	812,112
Impact of Incremental Employees			17,371
Gross Normalized 401(K) Cost		1,204,515	1,355,688
Amount to be charged to Operations and Maintenance Expense	73.14%	$ 880,983	$ 991,550

Note: Assumes 8 incremental employee hired during fiscal 2026 and an additional 6 hired in fiscal 2027. Per National Fuel Exhibit ATF-4, Schedule 5, the average compensation of the incremental employees for the FTY is $53,609 and $62,658 for the FPFTY.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

401(K) Plan Company Payment
Link Month Oct. 2026 and Twelve Months Ending Oct. 2027

Company Payment		Link Month Oct. 2026	Rate Year Oct. 2027
401(K) Gross Union		$ 355,923	$ 419,793
401(K) Gross Hourly		184,105	194,932
401(K) Gross Supervisory		816,091	856,667
Impact of Incremental Employees		17,491	33,349
Gross Normalized 401(K) Cost		1,373,610	1,504,740
Amount to be charged to Operations and Maintenance Expense	73.14%	$ 1,004,658	$ 1,100,567

Note: Assumes 8 incremental employee hired during fiscal 2026 and an additional 6 hired in fiscal 2027. Per National Fuel Exhibit ATF-4, Schedule 5, the average compensation of the incremental employees for the FTY is $53,609 and $62,658 for the FPFTY.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Dental Expense
Twelve Months Ended Sept. 2025 and Twelve Months Ending Sept. 2026

		Historic Test Year Sept 2025		Future Test Year Sept. 2026	
Gross Annual Premium and Claim Payments		246,917		$	222,772
Increase projected		0			0
Total Projected Dental Plan Costs		246,917			222,772
less: Employee Contributions		51,120			47,236
Total Gross Normalized Dental Costs		$195,797			$175,536
Amount to be charged to Operations and Maintenance Expense	73.14%	$143,206		73.14%	$128,387

	Gross	Contribution	
9/30/2023	$ 212,074	$ (44,126)	$ 167,948
9/30/2024	$ 209,324	$ (46,462)	$ 162,862
9/30/2025	$ 246,917	$ (51,120)	$ 195,797
3 Year Average	**$ 222,772**	**$ (47,236)**	**$ 175,536**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Dental Expense
Link Month Oct. 2026 and Twelve Months Ending Oct. 2027

		Link Month Oct. 2026		Rate Year Oct. 2027
Gross Annual Premium and Claim Payments		$222,772		$222,772
Increase projected		0		0
Total Projected Dental Plan Costs		222,772		222,772
less: Supervisory Contribution for Twelve Months		47,236		47,236
Total Gross Normalized Dental Costs		$175,536		$175,536
Amount to be charged to Operations and Maintenance Expense	73.14%	$128,387	73.14%	$128,387

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Annuity Benefits
Twelve Months Ended Sept. 2025 and Twelve Months Ending Sept. 2026

	Historic Test Year Sept 2025		Future Test Year Sept. 2026	
Qualified Retirement Plan Funding	$0		0	
Gross Annual Annuity Benefit	$0		$0	
O&M Percent	73.14%	$0	73.14%	$0
ERP (Funding Based on FAS 87 - Represents Pennsylvania's Expense Portion)	$ -		$ -	
Tophat (Funding Based on FAS 87 - Prepresents Pennylvania's Expense Portion)	$ -		$ -	
Amount to be charged to Operations and Maintenance Expense		$0		$0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits
Workpaper For Cost Element - Employee Benefits

Exhibit No. MPW-1
Schedule 1 (Benefits)
Witness: Weidner
Page 1

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Group Life Insurance	$53,051	($1,610)	$51,440
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Dental Plan	147,628	(4,422)	143,206
Annuity	0	0	0
Post Retirement Benefits	(1,558,903)	1,558,903	0
Retirement Savings Account	750,051	64,371	814,422
Stock Based Compensation	1,306,647	0	1,306,647
Miscellaneous	(183,415)	0	(183,415)
Benefits From New York	778,446	0	778,446
Benefits From Other Subs	433,394	0	433,394
	$6,497,279	$1,588,661	$8,085,939

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Exhibit No. MPW-1
Schedule 1 (Benefits)

Witness: Weidner

Workpaper For Cost Element - Employee Benefits

Page 2

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Dental Plan	128,387	$0	128,387
Annuity	0	$0	0
Post Retirement Benefits	0	$0	0
Retirement Savings Account	921,727	$90,163	1,011,890
Stock Based Compensation	1,429,959	$0	1,429,959
Miscellaneous	(188,102)	($0)	(188,102)
Benefits From New York	778,446	$0	778,446
Benefits From Other Subs	409,014	$0	409,014
	$8,805,928	$691,720	$9,497,648

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Group Life Insurance
Twelve Months Ended Sept. 2025 and Twelve Months Ending Sept. 2026

	Historic Test Year Sept 2025			Future Test Year Sept. 2026		
Term Insurance Rate Note 1	$0.072			$0.072		
Term Insurance Volume (Calculation below)	30,205	$2,175		31,242	$2,249	
AD & D Insurance Rate Note 1	$0.020			$0.020		
AD & D Insurance Volume (Calculation below)	27,655	553		29,344	587	
Blanket Travel - Per Month		$ 109.97			109.97	
Total Monthly Gross Premium		$2,838			$2,946	
Gross Normalized Group Life Insurance (x 12)			$34,056			$35,352
Amount to be charged to Operations and Maintenance Expense	73.14%		$24,908	73.14%		$25,856
Officer Life Insurance - Per Book			$26,532			$26,532
Total Group Life Insurance			$51,440			$52,388

Volume Calculation at	Sept 2025	Sept. 2026
Basic Life-participants	233	241
Basic Life-$ Volume	30,205	31,242
AD&D-participants	131	139
AD&D-$Volume	27,655	29,344

Note: Assumes 8 incremental employee hired during fiscal 2026 and an additional 6 hired in fiscal 2027. Also, premium rates decreased from prior years, so using a 3-year average is inappropriate

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Group Life Insurance
Link Month Oct. 2026 and Twelve Months Ending Oct. 2027

	Link Month 10/31/2026			Rate Year TME 10/31/2027		
Term Insurance Rate Note 1	$0.072			$0.072		
Term Insurance Volume (Calculation below)	31,242	$2,249		31,242	$2,249	
AD & D Insurance Rate Note 1	$0.020			$0.020		
AD & D Insurance Volume (Calculation below)	29,344	$ 587		29,344	$ 587	
Blanket Travel - Per Month		109.97			109.97	
Total Monthly Gross Premium		$2,946			$2,946	
Gross Normalized Group Life Insurance Annualized (x 12)			$35,352			$35,352
Amount to be charged to Operations and Maintenance Expense	73.14%		$25,856	73.14%		$25,856
Officer Life Insurance - Per Book			$26,532			$26,532
Total Group Life Insurance			$52,388			$52,388

Volume Calculation at	Oct. 2026	Oct. 2027
	247	247
	31,242	31,242
	145	145
	29,344	29,344

National Fuel Gas Distribution Corporation
Pennsylvania Division
Calculation of Medical and Prescription

Exhibit No. MPW-1
Schedule 2 (Benefits)
Witness: Weidner
Page 3-4 Workpaper

Medical

Month	Paid Claims / Stop Loss	Enrolled	Paid Claims/ Enrolled		Base Rate Rolling 12 Months			Non-Enrollment Admin Fees	Enrollment Admin Fees
September-24	$ 317,370	366	$ 867		$ 1,177			$ 3,799	$ 21,915
October-24	$ 398,281	365	$ 1,091		$ 1,167			$ 3,818	$ 21,915
November-24	$ 605,925	364	$ 1,665		$ 1,221			$ 3,811	$ 11,685
December-24	$ 493,859	369	$ 1,338		$ 1,221			$ 3,911	$ 22,151
January-25	$ 393,535	379	$ 1,038		$ 1,241			$ 3,889	$ 19,819
February-25	$ 456,790	380	$ 1,202		$ 1,236			$ 1,763	$ 24,359
March-25	$ 412,021	376	$ 1,096		$ 1,211			$ 6,087	$ 24,106
April-25	$ 447,152	377	$ 1,186		$ 1,220			$ 3,985	$ 24,002
May-25	$ 554,367	376	$ 1,474		$ 1,229			$ 3,933	$ 23,938
June-25	$ 601,766	375	$ 1,605		$ 1,270			$ 3,926	$ 23,875
July-25	$ 338,796	379	$ 894		$ 1,232			$ 3,961	$ 23,960
August-25	$ 646,061	375	$ 1,723	Annual %	$ 1,264	Annual 12-Month Rolling %		$ 3,923	$ 23,708
September-25	$ 507,586	373	$ 1,361	56.9%	$ 1,305	10.9%		$ 3,905	$ 23,581
				Annual Rate at September 2025		10.90%		$ 46,912	$ 267,098
								TME Admin	$ 314,011
Base Rate at HTY September 2025				1,304.84				TME Enrolled	4,488
								Avg Admin TME	$69.97
September 2025 annualized				$1,304.84					
Administrative				69.97					
Total HTY				$1,374.81	HTY				
Base Rate Annualized at September 2025				$1,304.84					
Increase to provide September 2026				10.90%	annual increase	Base Rate Claims	Admin	Total FTY September 2026	
Base Rate at FTY September 2026				$1,447.07	FTY	$1,447.07	69.97	$1,517.04	
Increase to provide October 2026				0.91%	1/12 annual increase	Base Rate Claims	Admin	Link Month October 2026	
						$1,460.24	69.97	$1,530.21	
Base Rate at October 2026				$1,460.24	Link Month				
Increase to provide October 2027 annualized				10.90%	annual increase				
October 2027 annualized				$1,619.41					
Administrative				69.97					
Total October 2027 annualized				$1,689.38	Rate Year				

Prescription

Month	Paid Claims	Employees	Paid Claims/ Employee		Base Rate Rolling 12 Months		Admin Fees
September-24	$ 29,349	200	146.74		248.24		231.55
October-24	$ 24,880	199	125.03		235.63		987.64
November-24	$ 59,174	199	297.36		240.45		435.61
December-24	$ 24,810	199	124.68		220.83		375.82
January-25	$ 45,783	207	221.17		212.78		274.04
February-25	$ 49,721	211	235.64		210.61		1016.94
March-25	$ 27,477	209	131.47		194.39		3647.01
April-25	$ 60,356	211	286.05		201.70		736.76
May-25	$ 58,056	211	275.15		208.00		840.12
June-25	$ 43,719	211	207.20		205.46		640.7
July-25	$ 71,677	213	336.51		219.64		491.33
August-25	$ 31,888	209	152.57	Annual 12-Month Rolling %	212.54	Annual %	505.42
September-25	$ 39,329	205	191.85	30.7%	216.13	-12.94%	171.92
				Annual Rate at September 2025		-12.94%	
Base Rate at HTY September 2025					216.13		
September 2025 annualized					$216.13		
Administrative					4.12		
Total HTY					$220.25	HTY	
Base Rate Annualized at September 2025					$216.13		
Increase to provide September 2026					-12.94%	annual decrease	
Base Rate at FTY September 2026					$188.16	FTY	
Administrative					4.12		
Base Rate at FTY					192.28		
Increase to provide October 2026					-1.08%	1/12 annual increase	
Base Rate at October 2026					$186.13	Link Month	
Administrative					4.12		
Increase to provide October 2027 annualized					190.25		
Increase to provide October 2027 annualized					-12.94%	annual decrease	
October 2027 annualized					$162.04		
Administrative					4.12		
Total October 2027 annualized					$166.16	Rate Year	

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Hospitalization Expense
Twelve Months Ended Sept. 2025 and Twelve Months Ending Sept. 2026

	Historic Test Year Sept 2025		Future Test Year Sept. 2026	
Health Insurance				
Annualized Rate per employee	$1,374.81		$1,517.04	
Participating active employees in health care plans - see Note (2)	373		381	
Gross (Monthly x 12)	512,803	$6,153,635	577,991	$6,935,892
Wellness Program				
Annual Gross Premium		4,776	0.00%	4,776
Carved Out Pharmacy Prescription Drug Benefits				
Annualized Rate per employee	$220.25		$192.28	
Participating active employees in health care plans Note (1) and (2)	205		213	
Gross (Monthly x 12)	45,150	541,803	40,955	491,455
Gross Normalized Hospitalization Cost		6,700,214		7,432,123
less: Supervisory Contribution		427,771		474,500
less: Hourly Contribution		993,777		1,102,334
Total Gross Normalized Hospitalization Costs		$5,278,665		$5,855,289
Amount to be charged to Operations and Maintenance Expense	73.14%	$3,860,816	73.14%	$4,282,559

Note (1) Certain Union employees have health insurance that includes pharmaceutical coverage (i.e. it's not carved out). In addition, Permanent Part Time employees do not receive pharmaceutical coverage.

Note (2) Assumes 8 incremental employees hired during fiscal 2026 and another 6 in fiscal 2027

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Hospitalization Expense
Link Month Oct. 2026 and Twelve Months Ending Oct. 2027

	Link Month 10/31/2026		Rate Year TME 10/31/2027	
Health Insurance				
Annualized Rate per employee	$1,530.21		$1,689.38	
Participating active employees in health care plans - see Note (2)	387		387	
Gross (Monthly x 12)	592,190	$7,106,280	653,789	$7,845,465
Wellness Program				
Annual Gross Premium		4,776		4,776
Carved Out Pharmacy Prescription Drug Benefits				
Annualized Rate per employee	$190.25		$166.16	
Participating active employees in health care plans Note (1) and (2)	219		219	
Annual Gross (x 12)	41,664	499,964	36,388	436,656
Gross Normalized Hospitalization Cost		7,611,020		8,286,897
less: Supervisory Contribution for Twelve Months		485,921		529,072
less: Union Contribution for Twelve Months		1,128,868		1,229,114
Total Gross Normalized Hospitalization Costs		$5,996,231		$6,528,710
Amount to be charged to Operations and Maintenance Expense	73.14%	$4,385,643	73.14%	$4,775,099

Note (1) Certain Union employees have health insurance that includes pharmaceutical coverage (i.e. it's not carved out). In addition, Permanent Part Time employees do not receive pharmaceutical coverage.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DISTRIBUTION
401(K) COMPANY MATCH
PROJECTED
CONFIDENTIAL

Exhibit No. MPW - 1
Schedule 2 (Benefits)
Witness: Weidner
Page 5 & 6 Workpaper
CONFIDENTIAL

	Non Union Hourly Employees	Annual 401(k) Co. Match	Salaried Employees	Annual 401(k) Co. Match	Union Employees	G Annual 401(k) Co. Match	Total	401(k) Company Match	
As of 9/2025	98	-	121	-	124		343	1,225,192	GL Balance at Sep. 2025
								-	
Compensation Subject to Match (Based on Current Contributing Participants)	5,409,664		13,714,704		8,981,086				
Weighted Avg Match %	3.0%		5.7%		3.0%				
Projected Company Match	-	161,413	-	776,305	-	266,798		1,204,515	Twelve Months Ended Sep. 2025 Normalized
		-		-		-			
Compensation Subject to Match (Based on Current Contributing Participants)	6,100,450		14,347,295		9,810,213				
Weighted Avg Match %	3.0%		5.7%		3.5%				
Projected Company Match	-	181,836 **A**	-	812,112 **C**	-	344,368 **E**		1,338,316	Twelve Months Ending Sep. 2026
		-		-		**Impact of Incremental Employees**		**17,371**	
Compensation Subject to Match (Based on Current Contributing Participants)	6,177,204		14,417,583		9,902,338			**1,355,688**	**Twelve Months Ending Sep. 2026**
Weighted Avg Match %	3.0%		5.7%		3.6%				**(with Incremental Employees)**
Projected Company Match	-	184,105	-	816,091	-	355,923		1,356,119	Link Month Oct. 2026
		-		-		Impact of Incremental Employees		17,491	
Compensation Subject to Match (Based on Current Contributing Participants)	6,541,736		15,134,419		10,458,126			**1,373,610**	**Link Month Oct 2026 (with**
Weighted Avg Match %	3.0%		5.7%		4.0%				**Incremental Employees)**
Projected Company Match	-	194,932 **B**	-	856,667 **D**	-	419,793 **F**		1,471,391	Twelve Months Ending Oct. 2027
		-		-		**Impact of Incremental Employees**		**33,349**	

Note: Assumes 8 incremental employee hired during fiscal 2026 and an additional 6 hired in fiscal 2027.
Per National Fuel Exhibit ATF-4, Schedule 5, the average compensation of the incremental employees for the FTY is $53,609 and $62,658 for the FPFTY.

1,504,740 **Twelve Months Ending Oct. 2027 (with Incremental Employees)**

A Projecting an [redacted]% increase for Non-Union Hourly (except for the few exempt employees that receive a [redacted] increase) effective 1/1/2026. This represents an approximate $[redacted] base pay adjustment plus annual increases

B Projecting a [redacted] increase for all Non-Union hourly effective 1/1/2027

C Projecting a [redacted] increase for Supervisory employees effective 1/1/2026. This represents an approximate $145,000 salary adjustment

D Projecting a [redacted] increase for Supervisory employees effective 1/1/2027

E Projecting a [redacted] increase for 2154P Union employees and a 10% increase for F&O Union employees effective 1/1/2026

F Projecting a [redacted] increase for F&O Union employees effective 11/1/2026, a [redacted] increase for F&O Union employees 5/1/2027 and a [redacted] increase for 2154P Union employees 4/15/2027

G Projecting an adjustment to matching schedule effective 4/1/2026 to align with recent union agreements in NY jurisdiction.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

401(K) Plan Company Payment
Twelve Months Ended Sept. 2025 and Twelve Months Ending Sept. 2026

Company Payment		Historic Test Year Sept 2025	Future Test Year Sept. 2026
401(K) Gross Union		$ 266,798	$ 344,368
401(K) Gross Hourly		161,413	181,836
401(K) Gross Supervisory		776,305	812,112
Impact of Incremental Employees			17,371
Gross Normalized 401(K) Cost		1,204,515	1,355,688
Amount to be charged to Operations and Maintenance Expense	73.14%	$ 880,983	$ 991,550

Note: Assumes 8 incremental employee hired during fiscal 2026 and an additional 6 hired in fiscal 2027. Per National Fuel Exhibit ATF-4, Schedule 5, the average compensation of the incremental employees for the FTY is $53,609 and $62,658 for the FPFTY.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

401(K) Plan Company Payment
Link Month Oct. 2026 and Twelve Months Ending Oct. 2027

Company Payment		Link Month Oct. 2026	Rate Year Oct. 2027
401(K) Gross Union		$ 355,923	$ 419,793
401(K) Gross Hourly		184,105	194,932
401(K) Gross Supervisory		816,091	856,667
Impact of Incremental Employees		17,491	33,349
Gross Normalized 401(K) Cost		1,373,610	1,504,740
Amount to be charged to Operations and Maintenance Expense	73.14%	$ 1,004,658	$ 1,100,567

Note: Assumes 8 incremental employee hired during fiscal 2026 and an additional 6 hired in fiscal 2027. Per National Fuel Exhibit ATF-4, Schedule 5, the average compensation of the incremental employees for the FTY is $53,609 and $62,658 for the FPFTY.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Dental Expense
Twelve Months Ended Sept. 2025 and Twelve Months Ending Sept. 2026

		Historic Test Year Sept 2025		Future Test Year Sept. 2026	
Gross Annual Premium and Claim Payments		246,917		$	222,772
Increase projected		0			0
Total Projected Dental Plan Costs		246,917			222,772
less: Employee Contributions		51,120			47,236
Total Gross Normalized Dental Costs		$195,797			$175,536
Amount to be charged to Operations and Maintenance Expense	73.14%	$143,206		73.14%	$128,387

	Gross	Contribution	
9/30/2023	$ 212,074	$ (44,126)	$ 167,948
9/30/2024	$ 209,324	$ (46,462)	$ 162,862
9/30/2025	$ 246,917	$ (51,120)	$ 195,797
3 Year Average	**$ 222,772**	**$ (47,236)**	**$ 175,536**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Dental Expense
Link Month Oct. 2026 and Twelve Months Ending Oct. 2027

		Link Month Oct. 2026		Rate Year Oct. 2027
Gross Annual Premium and Claim Payments		$222,772		$222,772
Increase projected		0		0
Total Projected Dental Plan Costs		222,772		222,772
less: Supervisory Contribution for Twelve Months		47,236		47,236
Total Gross Normalized Dental Costs		$175,536		$175,536
Amount to be charged to Operations and Maintenance Expense	73.14%	$128,387	73.14%	$128,387

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Annuity Benefits
Twelve Months Ended Sept. 2025 and Twelve Months Ending Sept. 2026

	Historic Test Year Sept 2025		Future Test Year Sept. 2026	
Qualified Retirement Plan Funding	$0		0	
Gross Annual Annuity Benefit	$0		$0	
O&M Percent	73.14%	$0	73.14%	$0
ERP (Funding Based on FAS 87 - Represents Pennsylvania's Expense Portion)	$ -		$ -	
Tophat (Funding Based on FAS 87 - Prepresents Pennylvania's Expense Portion)	$ -		$ -	
Amount to be charged to Operations and Maintenance Expense		$0		$0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Annuity Benefits
Link Month Oct. 2026 and Twelve Months Ending Oct. 2027

	Link Month Oct. 2026		Rate Year Oct. 2027	
Qualified Retirement Plan Funding	0		0	
Gross Annual Annuity Benefit	$0		$0	
O&M Percent	73.14%	$0	73.14%	$0
ERP (Funding Based on FAS 87 - Represents Pennsylvania's Expense Portion)		$ -		$0
Tophat (Funding Based on FAS 87 - Represents Pennsylvania's Expense Portion)		$ -		$0
Amount to be charged to Operations and Maintenance Expense		$0		$0

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DISTRIBUTION
RETIREMENT SAVINGS ACCOUNT
PROJECTED
CONFIDENTIAL

Exhibit No. MPW-1
Schedule 2 (Benefits)
Witness: Weidner
Page 11 & 12 Workpaper
CONFIDENTIAL

	Non Union Hourly Employees	Annual RSA Contribution	Salaried Employees	Annual RSA Contribution	Union Employees	Annual RSA Contribution	Total	Annual RSA Contribution	
As of 9/2025	99	-	112	-	206		417	1,066,238	GL Balance at Sep. 2025
								-	
Compensation Subject to RSA	5,302,461		12,439,204		13,296,962				
Weighted Avg RSA %	3.5%		3.8%		3.5%				
Projected RSA Contribution	-	183,051	-	466,912	-	463,548		1,113,511	Twelve Months Ended Sep. 2025 Normali
		-		-		-			
Compensation Subject to RSA	6,065,466		13,202,867		15,357,270				
Weighted Avg RSA %	3.5%		3.8%		3.5%				
Projected RSA Contribution	-	210,800 **A**	-	498,395 **C**	-	535,676 **E**		1,244,871	Twelve Months Ending Sep. 2026
						Impact of Incremental Employees		**15,351**	
								1,260,223	**Twelve Months Ending Sep. 2026 (with Incremental Employees)**
		-		-		-			
Compensation Subject to RSA	6,149,345		13,284,575		15,551,827				
Weighted Avg RSA %	3.5%		3.8%		3.5%				
Projected RSA Contribution	-	213,798	-	502,007	-	543,210		1,259,015	Link Month Oct. 2026
		-		-		**Impact of Incremental Employees**		**15,366**	**Link Month Oct 2026 (with Incremental Employees)**
Compensation Subject to RSA	6,519,299		13,950,896		16,538,271			**1,274,381**	
Weighted Avg RSA %	3.5%		3.8%		3.6%				
Projected RSA Contribution	-	228,279 **B**	-	534,811 **D**	-	591,367 **F**		1,354,458	Twelve Months Ending Oct. 2027
						Impact of Incremental Employees		**29,039**	
Note: Assumes 8 incremental employee hired during fiscal 2026 and an additional 6 hired in fiscal 2027. Per National Fuel Exhibit ATF-4, Schedule 5, the average compensation of the incremental employees for the FTY is $53,609 and $62,658 for the FPFTY.				-				**1,383,497**	**Twelve Months Ending Oct. 2027 (with Incremental Employees)**
								-	

A Projecting an [redacted] increase for Non-Union Hourly (except for the few exempt employees that receive a [redacted] increase) effective 1/1/2026. This represents an approximate $525,000 base pay adjustment plus annual increases

B Projecting a [redacted] increase for all Non-Union hourly effective 1/1/2027

C Projecting a [redacted] increase for Supervisory employees effective 1/1/2026. This represents an approximate $[redacted] salary adjustment

D Projecting a [redacted] increase for Supervisory employees effective 1/1/2027

E Projecting a [redacted] increase for 2154P Union employees and a [redacted] increase for F&O Union employees effective 1/1/2026

F Projecting a [redacted] increase for F&O Union employees effective 11/1/2026, a [redacted] increase for F&O Union employees 5/1/2027 and a [redacted] increase for 2154P Union employees 4/15/2027

NOTE Plan effective July 1, 2003 and provides for a company contribution of 3% of employee salary for fewer than 6 years of service and 4% for 6 years and more of service. Benefit received 3 months after hire date for non-union and 6 months for union.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Retirement Savings Account
Twelve Months Ended Sept. 2025 and Twelve Months Ending Sept. 2026

		Historic Test Year Sept 2025	Future Test Year Sept. 2026
RSA Gross Union		$ 463,548	$ 535,676
RSA Gross Hourly		183,051	210,800
RSA Gross Supervisory		466,912	498,395
Impact of Incremental Employees			15,351
Gross Normalized RSA Cost		1,113,511	1,260,223
Amount to be charged to Operations and Maintenance Expense	73.14%	$ 814,422	$ 921,727

Note: Assumes 8 incremental employee hired during fiscal 2026 and an additional 6 hired in fiscal 2027. Per National Fuel Exhibit ATF-4, Schedule 5, the average compensation of the incremental employees for the FTY is $53,609 and $62,658 for the FPFTY.

Plan effective July 1, 2003 and provides for a company contribution of 3% of employee salary for fewer than 6 years of service and 4% for 6 years and more of service. Benefit received 3 months after hire date for non-union and 6 months for union.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Retirement Savings Account
Link Month Oct. 2026 and Twelve Months Ending Oct. 2027

		Link Month Oct. 2026	Rate Year Oct. 2027
RSA Gross Union		$ 543,210	$ 591,367
RSA Gross Hourly		213,798	228,279
RSA Gross Supervisory		502,007	534,811
Impact of Incremental Employees		15,366	29,039
Gross Normalized RSA Cost		1,274,381	1,383,497
Amount to be charged to Operations and Maintenance Expense	73.14%	$ 932,082	$ 1,011,890

Note: Assumes 8 incremental employee hired during fiscal 2026 and an additional 6 hired in fiscal 2027. Per National Fuel Exhibit ATF-4, Schedule 5, the average compensation of the incremental employees for the FTY is $53,609 and $62,658 for the FPFTY.

Plan effective July 1, 2003 and provides for a company contribution of 3% of employee salary for fewer than 6 years of service and 4% for 6 years and more of service. Benefit received 3 months after hire date for non-union and 6 months for union.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Stock Based Compensation
Twelve Months Ended Sept. 2025 and Twelve Months Ending Sept. 2026

	Historic Test Year Sept 2025	Future Test Year Sept. 2026
Restricted Stock for Supervisory Staff-Charged to O&M	$ 233,280	$ 182,075
Restricted Stock for Officers - Charged to O&M	$ 320,581	$ 290,746
Performance Shares for Officers-Charged to O&M	$ 752,785	$ 957,138
Total 12-Month Stock Compensation	$1,306,647	$1,429,959

	Restricted Stock Supervisors	Restricted Stock Officers	Performance Shares for Officers
9/30/2023	$ 154,474	$ 256,239	$ 1,081,388
9/30/2024	$ 158,470	$ 295,417	$ 1,037,242
9/30/2025	$ 233,280	$ 320,581	$ 752,785
3 Year Average	**$ 182,075**	**$ 290,746**	**$ 957,138**

Note: The December 2024 grant of Restricted Stock to Supervisors was changed from a vesting period of 60 months to 36 months (previous grants vested over 60 months).

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Stock Based Compensation
Link Month Oct. 2026 and Twelve Months Ending Oct. 2027

	Link Month Oct. 2026	Rate Year Oct. 2027
Restricted Stock for Supervisory Staff-Charged to O&M	$182,075	$182,075
Restricted Stock for Officers - Charged to O&M	$290,746	$290,746
Performance Shares for Officers-Charged to O&M	$957,138	$957,138
Total 12-Month Stock Compensation	$1,429,959	$1,429,959

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Other Benefits Charged to Pennsylvania Division
Twelve Months Ended Sept. 2025 and Twelve Months Ending Sept. 2026

	Historic Test Year Sept 2025	Future Test Year Sept. 2026
Benefits from New York Division	778,446	778,446
Benefits from Other Subsidiaries	433,394	409,014
Total Normalized Other Benefits Charged to Pennsylvania	$1,211,841	1,187,460

	Benefits from Other Subsidiaries
9/30/2023	$ 401,457
9/30/2024	$ 392,190
9/30/2025	$ 433,394
3 Year Average	**$ 409,014**

Note: In Case 23-G-0257, the New York Division reset it rates, effective during the 12 months ended 9/30/2025. As such, it is appropriate to use the HTY for future years.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits

Other Benefits Charged to Pennsylvania Division
Link Month Oct. 2026 and Twelve Months Ending Oct. 2027

	Link Month Oct. 2026	Rate Year Oct. 2027
Benefits from New York Division	778,446	778,446
Benefits from Other Subsidiaries	409,014	409,014
Total Annualized Other Benefits Charged to Pennsylvania	1,187,460	1,187,460

Range: Perbooks

National Fuel Gas Distribution Corporation
Pennsylvania Division
Operations and Maintenance Expense Adjustments to Benefits
Workpaper For Cost Element - Employee Benefits

Exhibit No. MPW-1
Schedule 3 (Benefits)
Witness: Weidner

	TME 9/30/2023	TME 9/30/2024	TME 9/30/2025	Normalizing	HTY		FTY		Link Month		Rate Year
	Per Books	Per Books	Per Books	Adjustments	TME 9/30/2025	Adjustments	TME 9/30/2026	Adjustments	10/31/2026	Adjustments	TME 10/31/2027
Group Life Insurance	$58,408	$57,974	$53,051	($1,610)	$51,440	$948	$52,388	$0	$52,388	$0	$52,388
Officer Life Insurance	$35,757	$32,157	$36,146		$26,532		$26,532		$26,532		$26,532
Non Officer Life Insurance	$22,651	$25,817	$16,905		$24,908		$25,856		$25,856		$25,856
Hospitalization Insurance (Only Breakdown We Are Able to Provide is Executive Medical Highmark Plan versus All Other Medical/Rx/Wellness)	2,930,490	3,642,024	3,871,910	(11,094)	3,860,816	421,743	4,282,559	103,085	4,385,643	389,456	4,775,099
Officer	136,840	139,438	138,517		138,120		153,208		156,896		170,829
Non-Officer	2,793,650	3,502,587	3,733,393		3,722,695		4,129,350		4,228,747		4,604,270
401(K) Plan (Only Available Breakdown is Below)	773,207	831,805	898,470	(17,487)	880,983	110,567	991,550	13,108	1,004,658	95,909	1,100,567
Hourly (Union/Non-Union)	300,972	307,687	317,494		313,193		384,866		394,976		449,609
Supervisory	472,235	524,118	580,975		567,790		593,979		596,889		626,566
Incremental (Includes Hourly and Supervisory)							12,705		12,793		24,391
Dental Plan(Not Recorded by Employee Type and Not by Officer/Executive versus Non-Officer/Executive)	127,395	107,288	147,628	(4,422)	143,206	(14,819)	128,387	-	128,387	-	128,387
Annuity (All Officer/Executive)	2,325,957	950,067	-	-	-	-	-	-	-	-	-
Post Retirement Benefits (Only Available Breakdown is Below)	(1,140,353)	(1,768,569)	(1,558,903)	1,558,903	-	-	-	-	-	-	-
Union	(581,064)	(1,193,644)	(1,351,777)								
Supervisory	(559,288)	(574,925)	(207,126)								
Retirement Savings Account (Only Available Breakdown is Below)	636,572	685,422	750,051	64,371	814,422	107,305	921,727	10,355	932,082	79,808	1,011,890
Union	297,030	288,964	311,490		472,923		545,973		553,676		599,490
Non-Union	339,541	396,458	438,560		341,499		364,526		367,168		391,161
Incremental (Both Union and Non-Union)							11,228		11,239		21,239
Stock Based Compensation	1,492,101	1,491,129	1,306,647	-	1,306,647	123,312	1,429,959	-	1,429,959	-	1,429,959
Officer Perf. Shares	1,081,388	1,037,242	752,785		752,785		957,138		957,138		957,138
Officer Restricted Stock	256,239	295,417	320,581		320,581		290,746		290,746		290,746
Non-Officer Restricted Stock	154,474	158,470	233,280		233,280		182,075		182,075		182,075
Miscellaneous	(206,827)	(174,064)	(183,415)	-	(183,415)	(4,687)	(188,102)	(0)	(188,102)	-	(188,102)
Benefits From New York	(579,139)	150,282	778,446	-	778,446	-	778,446	-	778,446	-	778,446
Benefits From Other Subs	401,457	392,190	433,394	-	433,394	(24,381)	409,014	-	409,014	-	409,014
	$6,819,268	$6,365,548	$6,497,279	$1,588,661	$8,085,939	$719,988	$8,805,928	$126,547	$8,932,475	$565,173	$9,497,648

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 5-R

Rebuttal Testimony of Michael P. Weidner

Topics Addressed: **Executive Cash Bonus and Stock Based Compensation**

Dated: May 12, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Michael P. Weidner. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. Did you previously submit testimony in this proceeding on behalf of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company")?

A. Yes. I submitted my direct testimony, National Fuel Statement No. 5, on January 28, 2026.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your rebuttal testimony.

A. The purpose of my rebuttal testimony is to respond to arguments made by certain of the other parties regarding incentive compensation, including stock-based compensation and executive cash bonus incentive compensation. My testimony responds to certain positions of direct testimony submitted by the Bureau of Investigation and Enforcement ("I&E"), I&E Statement No. 1, the direct testimony of Christopher Keller, the Office of Consumer Advocate ("OCA"), OCA Statement No. 2, the direct testimony of Lafayette K. Morgan, and the Office of Small Business Advocate ("OSBA"), OSBA Statement No. 1, the direct testimony of Justin B. Farr regarding incentive compensation issues as well as any related payroll tax impact.

Q. Can you provide a summary of the rate recovery that I&E, OCA, OSBA propose to disallow?

A. Yes, please see the table below, which summarizes the other parties' recommended disallowances.

Summary of Cost Elements Addressed in Statement No. 5-R, Which Intervenors Proposed to Disallow		
Cost Element	**Intervenor**	**Amount Proposed to be Disallowed**
Executive Cash Bonus Incentive Compensation (part of Net Labor Expense)	I&E	$379,731 (with a $22,670 impact to payroll taxes)
Stock Based Compensation (part of Employee Benefits Expense)	OCA	$1,430,000 ($1,429,959 unrounded)
Stock Based Compensation (part of Employee Benefits Expense)	I&E	$909,281
Stock Based Compensation (part of Employee Benefits Expense)	OSBA	$1,382,102

Q. Are you sponsoring any exhibits with your rebuttal testimony?

A. No.

III. EXECUTIVE CASH BONUS AND STOCK BASED COMPENSATION

Q. Do you agree with the adjustment proposed by I&E witness Mr. Keller, to disallow the portion of the executive cash bonus incentive compensation attributable to financial performance metrics/goals ($379,731) along with the related payroll taxes ($22,679)?

A. No. I&E's primary argument for denying this portion of incentive compensation is that it only benefits shareholders. Providing a comprehensive incentive compensation program that balances and promotes a set of complementary goals is necessary in today's competitive workforce environment and provides significant benefits for ratepayers.

Q. How does the Company's incentive compensation program benefit ratepayers?

A. Ratepayers benefit from the Company's continued efforts to provide safe, consistent, and high-quality service all while operating at a reduced cost structure. Having executive goals linked to a combination of financial performance as well as safety, reliability, customer service, emissions reduction and diversity and inclusion initiatives incentivizes Company leaders to manage a business that can produce the best results for ratepayers. Having a combination of these goals, working in tandem, provides a synergy that directly benefits ratepayers. The Company also must be able to access capital (equity, short-term debt, and long-term debt) at reasonable costs in order to invest in/maintain infrastructure and hire and retain a talented, high-quality workforce needed to safely and effectively operate that infrastructure. Goals that incentivize strong financial performance are critical to maintaining this cost-effective access to capital, which benefits ratepayers through a lower revenue requirement and lower rates.

Q. Can you provide an example of how National Fuel's focus on financial performance has benefited ratepayers?

A. Yes. A reasonable way to evaluate if the practice of incentivizing financial performance is benefiting ratepayers would be to compare the Company's rate increases to the general

rate of inflation. As I will demonstrate below, the Company's focus on achieving savings through cost containment and capital efficiency has allowed the Company to keep its requested increase in delivery base rates in line with, if not below, general inflation.

Q. What was the effective date of the Company's current base delivery rates?

A. August 1, 2023.

Q. What is the accumulated Consumer Price Index since then?

A. Using data from the U.S. Bureau of Labor Statistics[1], an item that cost $100.00 in August 2023 would cost $107.55 in March 2026 (7.55% cumulative increase).

Q. Is the proposed increase in the overall revenue requirement since the last rate case less than the rate of inflation? What is the percentage increase in the overall revenue requirement from the last rate case?

A. Yes. The Company is requesting a $18,475,000 increase in its updated rebuttal position to its present rate revenues of $265,524,000, which represents an increase of 7.0%. Further, sound financial management has allowed the Company to avoid the need for a base delivery rate increase since 2023, as such, ratepayers have not been subject to increases in the interim periods.

[1] Available at: https://www.bls.gov/data/inflation_calculator.htm

Q. Are there additional reasons that all executive incentive based compensation is important to a Company's success and can lead to cost containment that benefits ratepayers?

A. Yes. Executive performance measures are also designed to ensure retention of key talent in the organization, which directly benefits the ratepayers. Offering competitive compensation packages is critical to retain employees, reinforce continuity of operations and help prevent attrition and the costs associated with turnover that are inevitably borne by the ratepayers. In the absence of incentive compensation arrangements, the Company would be required to offer increased base salaries in order to attract and retain employees. While an approach such as increasing base salaries might be easier to obtain rate recovery, such a compensation arrangement would not benefit the ratepayer since it would not directly incentivize cost containment along with safety, reliability, customer service, emissions reduction and diversity and inclusion initiatives. Therefore, the utilization of compensation packages that jointly incentivize financial performance and safe, reliable and quality service is a cost-effective, results-based approach, which benefits ratepayers. It is reasonable and appropriate for ratepayers to bear the cost of these incentive compensation programs, just like they bear the other costs of the Company from which they benefit.

Q. Given the importance of retaining key talent and incentivizing performance in its entirety as discussed above, should the compensation package be evaluated as a whole for rate-recovery, as opposed to attempting to separately evaluate incentive

compensation based on compensation attributable to financial related performance incentives, non-financial related performance incentives, and retention?

A. Yes, the compensation package should be evaluated as a whole and rate recovery should be provided in full for the reasons stated above, because the Company has demonstrated the ratepayer benefits from all performance and retention incentives. As such, the Company should be allowed to recover the full amount attributable to the Company's executive cash bonus incentive compensation of $855,587, including both the $379,731 attributable to financial performance goals and the $475,856 related to non-financial performance goals.

Q. Given the position noted above, do you agree with I&E's recommendation made in direct testimony to disallow $379,731 (along with the related impact to payroll taxes of $22,670) of rate recovery related to executive cash bonus incentive compensation attributable to financial performance related goals?

A. No, the Company proposes that the $379,731 (along with the related impact to payroll taxes of $22,670) be included in rate recovery.

Q. How does the Company ensure its executive compensation programs are appropriate and reasonable?

A. As discussed in the direct testimony of Valerie L. Hawthorn (Statement No. 4), National Fuel Gas Company ("NFG"), the Company's parent, retains the services of Korn Ferry, a nationally recognized firm that performs compensation analyses and reviews for companies in the energy and other business sectors. The analysis performed by Korn

Ferry helps evaluate the competitiveness of NFG's executive compensation packages. If the executive compensation package is not competitive, National Fuel runs the risk of turnover at the leadership level, which would be detrimental to overall business continuity. As discussed in Valerie Hawthorn's testimony, Korn Ferry's key findings from the most recent national compensation data indicates that National Fuel's total compensation package for executives, which includes base salary, short-term incentive compensation (cash bonus) and long-term incentive compensation (stock-based compensation in the form of performance shares and restricted stock) is at or below the median when compared with nationwide utility and general industry executives. Korn Ferry's findings further demonstrate that National Fuel's current executive compensation structure (including a goal structure that combines both financial and non-financial measures), is reasonable, as it rates at or below median when compared with nationwide utility and general industry executives. This finding further reinforces the appropriateness of National Fuel's executive goal structure comprised of a combination of financial and non-financial measures and demonstrates this goal structure is cost effective.

Q. What other tools are utilized to remain competitive and encourage retention of key employees?

A. Stock-based compensation is also utilized. As discussed above, stock-based compensation is part of the overall executive compensation package. In the event stock-based compensation was to be curtailed or eliminated, then base salary would need to be increased in order for the executive compensation package to remain competitive.

Q. Is stock-based compensation only awarded to executives?

A. No, select non-executive salaried employees also receive stock-based compensation in the form of restricted stock.

Q. What is the purpose of awarding restricted stock units to employees?

A. Restricted stock is utilized to encourage retention of top performers and control for (or avoid) costs associated with turnover. These shares of restricted stock vest over three equal annual installments as service is provided to National Fuel. Given the increasing operational complexities and regulatory requirements experienced by utilities and energy companies and the expanded efforts to modernize pipeline and distribution systems, a competitive compensation package encouraging retention and longevity, including time-vested restricted stock, is critical to the continued success of National Fuel and is in ratepayers' best interests.

Q. What is the dollar amount of requested rate recovery attributable to executive restricted stock?

A. The Company has included $290,746 of executive restricted stock cost in rate recovery.

Q. What is the dollar amount of requested rate recovery attributable to non-executive restricted stock?

A. The Company has included $182,075 of non-executive restricted stock cost in rate recovery.

Q. Do the award and vesting of restricted stock grants to non-executive employees and executives rely on specific achievement of certain goals or performance conditions (financial or otherwise) in the normal course?

A. No, these awards are made to provide an incentive for recipients to provide service to National Fuel for the requisite time and are necessary to retain employees. Employee retention is a critical issue for the Company, as was explained in Ms. Hawthorn's Direct Testimony (National Fuel Statement No. 4).

Q. In OCA witness Morgan argues that stock-based compensation is solely for the benefit of shareholders, and therefore the entire rate recovery request should be disallowed. OSBA witness Farr also argues that stock-based compensation is largely financial related and therefore should be disallowed (except for anything specifically tied to Environmental, Social, and Governance goals). Do you agree with these arguments?

A. No. First, as discussed above, the $290,746 and $182,075 attributable to restricted stock for executives and non-executive supervisors, respectively, are based on continued service provided by its recipients over the requisite time. The importance of these incentives has been previously discussed. Second, performance shares (including those attached to financial related goals) are not only beneficial for the shareholder, but also ratepayers.

Q. What is the dollar amount of requested rate recovery attributable to executive performance shares, and are financial related goals/performance conditions attached?

A. The Company has included $957,138 of executive performance share cost in rate recovery. Key to achieving these performance conditions has been cost containment, operational efficiency, and maintaining access to cost-effective capital, all of which benefit ratepayers.

Q. How do the performance conditions underpinning the executive performance shares promote affordability for ratepayers?

A. The affordability of delivery rates is achieved with the disciplined management of utility costs and finances over the long term. Sustainable affordability requires a culture of cost containment and a commitment to capital efficiency that is set and continuously reinforced by executive leadership. The long-term nature and terms of the performance conditions align with ratepayer interests making the performance shares a critical tool in achieving sustainable affordability of delivery rates for ratepayers.

Q. Do performance shares also have a retention element to them?

A. Yes, there is a retention element to performance shares. Unless otherwise determined by NFG's Compensation Committee, the performance cycle for each performance share grant is three years. It should be noted that there were no awards granted with performance cycles of less than three years during the historical test year, future test year, or fully projected future test year. The Equity Plan provides that in the event that an

executive's employment terminates by reason other than retirement, death, disability, or divestiture by NFG of a subsidiary, any unvested performance shares will be forfeited. As a result, the Equity Plan incentivizes executives not to terminate prior to retirement.

Q. Do you agree with the adjustments proposed by OCA witness Morgan, I&E witness Keller, and OSBA witness Farr to remove the $1,429,959 ($182,075 non-executive restricted stock + $290,746 executive restricted stock + $957,138 executive performance shares) related to stock-based compensation?

A. No. Ratepayers benefit from the retention of employees (including executives), cost containment, operational efficiency, and cost-effective access to capital that is accomplished through financial related goals/performance conditions. Stock-based compensation incentivizes both, and, as such, should be included in rate recovery in its entirety. The Company should be permitted to recover the entire $1,429,959.

Q. Does this conclude your rebuttal testimony at this time?

A. Yes.

NATIONAL FUEL STATEMENT NO. 6

MONIKA M. DUSZENKO

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 6

Direct Testimony of
Monika M. Duszenko

Topics Addressed:
Rate Base
Working Capital
Lead/ Lag Study
Net Plant

Dated: January 28, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Monika M. Duszenko. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. By whom and in what capacity are you employed?

A. I am employed as a Rate Analyst II in the Rates & Regulatory Affairs department of National Fuel Gas Distribution Corporation ("NFGDC"). In this role, I am responsible for regulatory matters related to NFGDC's Pennsylvania Division ("National Fuel" or the "Company") as well as NFGDC's New York Division ("National Fuel – NY").

Q. Please summarize your educational background and work experience.

A. In 2018, I earned a Bachelor of Science in Business Administration with a concentration in Finance from the State University of New York at Buffalo. Following graduation, I joined Citigroup as a Foreign Exchange Analyst, where I worked from 2018 to 2021. In December 2021, I began my tenure with NFGDC as a Rate Analyst I and was promoted to Rate Analyst II in January 2024.

Q. Have you previously testified in other proceedings before the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission") or any other state or federal agency?

A. Yes, I testified before the New York Public Service Commission ("NYPSC") on behalf of National Fuel – NY in Case 23-G-0627.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your testimony.

A. I will address the development of working capital, lead/lag study, actual and projected plant balances, and rate base for the historic test year ended September 30, 2025 ("HTY"), future test year ending September 30, 2026 ("FTY"), and fully projected future test year ending October 31, 2027 ("FPFTY").

Q. Are you sponsoring any exhibits in this proceeding?

Yes, I am sponsoring Exhibit A, Schedules C1, C-2, C-4, C-5, C-7, and C-8 for the HTY, FTY, and the FPFTY.

III. ACCOUNTING AND HISTORIC COSTS

Q. Do the continuing property records of the Company reflect the original cost value of property?

A. Yes. NFGDC's plant in service, retirements, additions, and any book adjustments were recorded per Generally Accepted Accounting Principles ("GAAP") and Uniform System of Accounts requirements by original cost value. These are recorded by division – New York and Pennsylvania.

Q. What process does the Company follow to ensure that property reflected in its plant accounts is in service?

A. Once a capital project is completed, National Fuel's capital project manager in the engineering department documents both the in-service date and the asset retirement units

that were either installed or removed as a part of this project. The engineering department will place the project in-service in the Company's financial software, using the provided information. Once the project is in-service,the identified retirement units are permitted by the software to be unitized from the project by an authorized user within the Company's Accounting or Engineering departments. The unitization process automatically generates the accounting entries to move the costs on the project to the appropriate National Fuel plant property accounts. These entries are subject to review by authorized individuals and further review by internal and external auditors.

IV. FULLY PROJECTED FUTURE TEST YEAR RATE BASE

Q. With reference to National Fuel's Exhibit A (FPFTY), Schedule C-1, please discuss how the Company's specific rate base items are determined.

A. National Fuel's rate base calculation is presented in Exhibit A, Schedule C-1. This schedule summarizes the rate base values for each test year. Column 1 shows the schedule reference information for each component in rate base. Columns 3 and 5 show the amounts of each rate base component, which is comprised of utility plant less accumulated depreciation, plus working capital, gas inventory, materials and supplies, less accumulated deferred income taxes and customer deposits. National Fuel's total Rate Base is $571.6 million for the FPFTY.

A. Utility Plant in Service

Q. Please describe the adjustments to total plant included on Exhibit A (HTY), Schedule C-2.

A. On page 3 of Schedule C-2, $10.3 million was added to the Company's plant in service to account for construction completed not classified ("CCNC"). CCNC includes projects that have been completed and are in service, but for bookkeeping purposes, had not been transferred to "in service" by the end of the HTY. An additional $2.4 million was also added to plant in service for projects that were unitized at the end of the HTY, but costs were distributed to assets at the beginning of the FTY. The total of the two adjustments equals $12.7 million and is shown in Schedule C-2, Page 3, Column 3.

Q. Please describe what is represented in Exhibit A, Schedule C-2.

A. The Company's claim for utility plant in service is represented in Exhibit A, Schedule C-2. The total amount of plant is reflected on page 3, column 5, $957.2 million for FPFTY. Utility plant allows the Company to provide gas service in a safe and reliable manner to its customers.

Q. Where are plant in service additions shown in the Company's exhibits?

A. Plant in service additions during the FPFTY are shown in Exhibit A, Schedule C-2, Page 2 and 3. To calculate additions, the Company calculated a historic capital spending allocation that was determined by calculating the average capital expenditures by month for fiscal years ("FY") 2023, 2024, and 2025. Then, each month's allocation was applied to capital budget expenditures by plant category for each of the future test years.

Q. Where are plant retirements shown?

A. Retirements are in Exhibit A (FPFTY), Schedule C-2, pages 2 and 3. To calculate retirements, the total amount of additions and retirements were determined for FY 2023, 2024, and 2025. Next, a percentage was calculated to determine the relationship of retirements to additions as a percentage for each fiscal year. The relationship percentage was then applied to the capital budget forecast to determine the retirements that will occur in each respective fiscal year. Additionally, a monthly spread was calculated to determine the percentage of retirements that occur per month, based on the distribution of retirements in the 2025 fiscal year. This monthly spread was subsequently applied to the amount determined for retirements.

Q. Are there any Distribution System Improvement Charge ("DSIC")-eligible additions in the plant balances?

A. Per the Company's Modified Long-Term Infrastructure Improvement Plan ("LTIIP") Filing[1], $43.8 million has been included in the HTY and $57.4 million has been included in the FTY. These amounts will be collected through the DSIC rate until the reset of the DSIC in the FPFTY.

Q. Please explain how National Fuel determined its rate base value for utility plant in service.

A. The Company's claim for utility plant in service is the total sum of the closing plant balances as of September 30, 2025. For the FTY ending September 30, 2026, additions

[1] PAPUC Docket P-2022-3034957, filed 12/11/2025

projected from the 2026 capital budget less projected plant retirements are added to the pro-forma balance from September 30, 2025 to determine the utility plant in service. The same is done for the FPFTY for the year ending October 31, 2027. National Fuel uses an allocation methodology to project monthly additions for plant in service for the future test years. Monthly historic spending allocations are calculated and then applied to the capital budget to determine monthly spending for the future test years. The Direct Testimony of Anthony T. Formato (National Fuel Statement No. 3) discusses the capital budget process.

B. <u>Accumulated Depreciation</u>

Q. Please describe the Company's accumulated depreciation claim.

A. Please refer to the Company's Exhibit A, Schedule C-3, the tables included in the depreciation study sponsored by John Spanos from Gannett Fleming, and the direct testimony of John Spanos, National Fuel Statement No. 8. Schedule C-3 shows accumulated provision for depreciation by FERC account. This amount is reduced from the total rate base. The FPFTY is for $320.6 million and is shown on page 1 in schedule C-3.

C. <u>Cash Working Capital</u>

Q. Please explain how the Company determined its rate base value for cash working capital ("CWC").

A. CWC is the capital requirement calculated between (1) the lag in the receipt of revenue for rendering service and (2) the lag in the payment of cash expenses incurred to provide

such service to National Fuel's customers. The CWC is summarized in Exhibit A, Schedule C-1 and Schedule C-4, Page 1. The elements of the working capital claim are listed, along with their corresponding references.

Q. Please describe the revenue lag calculations shown on Exhibit A (HTY), Schedule C-4, page 3.

A. To determine the revenue lag, the Company recorded the gross accounts receivable balances by month for the 13 months ended September 30, 2025. The Company then used this amount to come up with an average accounts receivable balance for this time period. In addition, all sales per month were recorded for the twelve months ("TME") ended September 2025. The accounts receivable turnover ratio was determined by dividing total sales for each period by the average accounts receivable balance, resulting in a 12.61 rate, equivalent to a 28.95 collection lag day factor. To this, the meter read lag factor of 3 days was added, which represents the lag between the meter read and bills being sent out. The service lag was also calculated and represents the time from the mid-point of the service period until the meter reading date. By summing up the collection lag day factor, service lag factor and the meter read lag factor, it resulted in 47.16 revenue lag days for TME September 2025.

Q. Is there a change in revenue lag methodology from National Fuel's last base rate case (Docket No. R-2022-3035730)?

A. In the previous base rate case, infrequent occurrences such as the Covid-19 pandemic impacted revenue lag; therefore, an average of three prior year time periods provided a

more accurate depiction of regular business operation revenue lag. For this HTY, the Company used a one-year period as operation revenues have returned to normal. Additionally in the prior rate case, uncollectible expenses were removed from the accounts receivable balances to mitigate any impacts from the Covid-19 pandemic. No adjustments have been made to the revenue lag in this proceeding.

Q. What is shown in Exhibit A (HTY), Schedule C-4, Pages 4 - 8?

A. These exhibits show the expense lag calculations for payroll (net labor), purchased gas costs ("PGC") and all other operations and maintenance ("O&M") expenses. Also included are calculations for interest payments, tax payments and prepaid expenses. All of these components are used in the working capital calculations, which are summarized in total on Exhibit A, Schedule C-4, Page 1.

Q. How was the mid-point of the service period calculated?

A. The mid-point of service for other O&M expenses and gas purchases is the difference between the date of payment and invoice date.

Q. How are the payroll expense lag days for the CWC claim calculated?

A. National Fuel's employees are paid weekly or bi-monthly, depending on the pay group (i.e., supervisory, hourly, clerical, etc.). The payroll lag is calculated by subtracting the mid-point of the pay period from the pay date. The weighted averages are then calculated by pay group and added together. The lag days are calculated by diving the weighted

average by the total amount of net labor costs. Payroll lag is 10.32 days and is found on Schedule C-4, Column 5, Line 5 (HTY).

Q. How were the lag days associated with the PGC shown on Exhibit A (HTY), Schedule C-4, Page 5, Column 5, Line 74 calculated?

A. The supplier and pipeline invoices were gathered for the HTY. The day's lag in Column 3 was calculated by subtracting the mid-point from the date the invoices were paid. The weighted average was then calculated by multiplying the amount of the invoices by the calculated day's lag. All weighted averages and total amount of invoices paid were totaled. The weighted average final day's lag was calculated by taking the sum of all weighted averages in Column 5 and dividing it by the total of gas purchased in Column 4, Line 73. The final day's lag was 39.83 days.

Q. How were the other O&M expense lag days, shown on Exhibit A (HTY), Schedule C-4, Page 4, Column 5, Line 21 calculated?

A. The O&M expenses are shown per month for the HTY in Column 2. Each month's lag days was calculated by subtracting the mid-point from the date invoices were paid, shown in Column 3. The weighted average was calculated by multiplying the amount of the invoices by that month's lag days, shown in Column 4. The sum of the weighted averages divided by the total amount of invoices paid equals the O&M expense lag days. The O&M expense lag days is 41.01 days, shown in Column 5, Line 21. Please also refer to the Direct Testimony of Anthony T. Formato, National Fuel Statement No. 3, for a detailed discussion of the Company's claimed O&M expenses.

Q. Please explain how the interest payment amounts included on Exhibit A, Schedule C-4 were determined.

A. The rate base for each test year, multiplied by the long-term debt ratio, multiplied by the embedded cost of long-term debt will give the total interest expense. This is shown in Page 6, Column 4, Line 4. The daily amount is then calculated on Line 5. The difference between the revenue lag days and the days to mid-point of the interest payments made is shown on Line 8. The total interest for working capital is the lag days multiplied by the daily interest, shown on page 3 of Schedule C-4, Column 4, Line 9 (FTY and FPFTY) and page 6 of Schedule C-4, Column 4, Line 9 (HTY).

Q. How was the tax payment lag for the working capital requirement shown on Exhibit A, Schedule C-4 determined?

A. The taxes that were used in the tax payment lag calculations were federal income, Pennsylvania property, and Public Utility Realty Tax Act ("PURTA") taxes and are shown in Exhibit A, Schedule C-4. The anticipated taxes for the FPFTY are also shown in Schedule C-4, Page 4. Each tax type was calculated separately for their lag calculation. The result of each tax type is shown in this schedule on Column 10.

Q. How was the working capital allowance for prepaid expenses, shown on Exhibit A (FPFTY) Schedule C-4 derived?

A. In the HTY, the Company recorded actual balances for prepaid expenses. For the FTY and FPFTY, a 13-month average of the actual prepaid balances for insurance, PAPUC Assessment and Information Technology was inflated using the inflation rates in National

Fuel Exhibit ATF-1. Please see the Direct Testimony of Anthony T. Formato (National Fuel Statement No. 3) for additional information on O&M methodology. The Company's claim for prepaid expenses is shown in Schedule C-4, Page 5 (FPFTY).

Q. What is the total amount of the Company's working capital claim?

A. The total working capital for the FPFTY is $6.8 million. This amount is represented on the summary page on Schedule C-4, Page 1 in Exhibit A.

D. <u>Gas Storage Inventory</u>

Q. Please explain how the rate base value for Gas Storage Inventory was determined.

A. The Company's gas storage inventory is included in the rate base claim the same as materials and supplies since gas storage inventory is considered a physical asset. National Fuel acquires gas for storage throughout the year, primarily used during the winter heating season when demand increases significantly. The storage inventory consists of gas volumes stored underground. The Company pays for storage inventory monthly. To determine the appropriate inventory levels, the Company uses a forecast to calculate injections and withdrawals based on most recent gas cost updates. The Company's gas inventory amount is shown in Exhibit A, Schedule C-5 for each test year. The calculation of the inventory amount is a modified 12-month average. Specifically, half of the first and last months' balances are averaged with the balances of the remaining middle months. The Company provided monthly balances for all available months and used the last known historical for the respective months in the FTY and FPFTY. The FPFTY modified average gas inventory balance is $5.7 million.

E. Accumulated Deferred Income Taxes

Q. Please explain how the Rate Base value for Accumulated Deferred Income Taxes ("ADIT") was calculated.

A. The Company's claim for ADIT is set forth in Exhibit A, Schedule C-6 (FPFTY). A detailed explanation of the calculation is provided in the direct testimony of Erica L. Forcucci (National Fuel Statement No. 12).

F. Customer Deposits

Q. Please explain how the Company calculated the rate base value for customer deposits, shown in Exhibit A, Schedule C-7.

A. National Fuel's claim for customer deposits is used to offset the need to provide further capital. The actual balances for customer deposits were recorded and provided on Schedule C-7. In the FTY and the FPFTY, the Company used the last known historical values for the respective months. The Company's claim for customer deposits for the FPFTY is $5.2 million.

G. Materials and Supplies Inventory

Q. What is the rate base claim for materials and supplies inventory?

A. The actual book balances for materials and supplies were recorded for the HTY and for any known balance in the FTY. For the FTY and FPFTY, the Company used the last historical values for the respective months. The average monthly balance as of October 31, 2027 is projected to be $1.6 million, shown on Exhibit A (FPFTY), Schedule C-8.

Q. Does this conclude your direct testimony at this time?

A. Yes.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 6-R

Rebuttal Testimony of
Monika M. Duszenko

Topics Addressed:
Rate Base
Working Capital
Lead/ Lag Study
Net Plant

Dated: May 12, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Monika M. Duszenko. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. Did you previously submit testimony in this proceeding on behalf of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company")?

A. Yes. I submitted my direct testimony, National Fuel Statement No. 6, on January 28, 2026.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your rebuttal testimony.

A. My rebuttal testimony addresses the Pennsylvania Office of Consumer Advocate's ("OCA") recommendations regarding cash working capital and related rate base adjustments presented in OCA Statement No. 2 (direct testimony of Lafayette K. Morgan, Jr.). I also address the Bureau of Investigation and Enforcement's ("I&E") recommendations regarding certain rate base adjustments presented in I&E Statement Nos. 1 and 3 (direct testimonies of Christopher Keller and Ethan H. Cline).

Q. Are you sponsoring any exhibits with your rebuttal testimony?

A. Yes. I am sponsoring Exhibit A (Rebuttal Update), Schedules C-1, C-4, and C-9 for the fully projected future test year ("FPFTY").

III. RATE BASE

Q. Have other parties proposed any recommendations to rate base?

A. Yes. OCA recommends reducing rate base by a thirteen month average amount for contributions in aid of construction ("CIAC") and customer advances for construction, as discussed in OCA Statement No. 2 at pages 10–11 and shown on Exhibit LKM-5A.

Q. Do you agree with the adjustment made by OCA?

A. The Company supports reflecting CIAC and customer advances as reductions to rate base. In my direct testimony, I used historic test year balances in developing FPFTY amounts. Consistent with that approach, the Company recommends using the 13-month average balance ending September 30, 2025, which results in $22,968 for CIAC and $60,373 for customer advances for construction. These amounts are reflected in Exhibit A (Rebuttal Update), Schedule C-1.

Q. Did OCA have any additional adjustments to rate base?

A. Yes. OCA also proposes a rate base change intended to reflect alternative rate of return ("ROR") recommendations presented in OCA Statement No. 3 (direct testimony of Maureen L. Reno). This proposal affects the long-term debt ratio used in the interest payment calculation. The Company's position on the appropriate long-term debt ratio is addressed in National Fuel Statement No. 10-R (rebuttal testimony of Joshua C. Nowak), and Exhibit A (Rebuttal Update) reflects the Company's corresponding calculations.

Q. Are there other proposals in the record that affect rate base through related inputs (e.g., O&M expense levels or accumulated depreciation)?

A. Yes. OCA proposes changes to certain O&M expenses that flow through the cash working capital calculation. The Company's response to the O&M expense issue is provided in National Fuel Statement No. 3-R (rebuttal testimony of Anthony Formato). In addition, there are recommendations to change accumulated depreciation, which would affect net plant in service. The Company's response on depreciation-related issues is provided in National Fuel Statement No. 8-R (rebuttal testimony of John J. Spanos).

Q. Did OCA have any additional adjustments to cash working capital?

A. Yes. In OCA Statement No. 2 (direct testimony of Lafayette K. Morgan, Jr.), OCA recommends excluding prepaid expenses from the Company's cash working capital allowance, which would reduce rate base by $1,080,000.

Q. Do you agree with OCA's recommendation to remove prepaid expenses in OCA Statement No. 2, pages 9 and 10?

A. No. The Company's cash working capital calculation reflects the methodology previously approved by the Commission in the Company's prior rate proceeding. Under that approach, prepaid expenses are a component of working capital because they represent cash outlays made in advance of the period in which the related costs are recognized in expense. Accordingly, the Company does not agree with OCA's removal of prepaid expenses from cash working capital.

Q. Are there any adjustments to make to cash working capital?

A. Yes, to ensure the Company's cash working capital reflects a consistent application of the lead/lag methodology and avoids any double counting, the Company will make an adjustment to remove prepaid expenses from the O&M expenses total which calculates the expense lag days. In the lead lag study on the Company's Exhibit A Schedule C-4, the expense lag days in relation to "Other O&M expenses" of 41.01 days used data that removed prepaid expenses from the calculation, but the corresponding working capital in column 2 included prepaid expenses. In Exhibit A (Rebuttal Update), Schedule C-4 at page 2, the Company will remove the prepaid expenses of $2,732,664 from "Other Expenses", so that the O&M expenses and payment days align methodologies. This adjustment confirms that prepaid expenses are reflected once in the cash working capital calculation.

Q. Did any other parties make recommendations to rate base?

A. Yes, I&E provided recommendations to reduce cash working capital in I&E Statement No. 1(direct testimony of Christopher Keller) at pages 22-24 to reduce cash working capital lead by $111,005, based on their adjustments to O&M expenses and I&E's recommended cost of long-term debt ratio.

Q. Do you agree with I&E's recommendation to change cash working capital?

A. No, as explained in the Company's Statement No. 3-R, the rebuttal testimony of Anthony Formato, I&E's proposed expense adjustments are not appropriate and therefore there is no basis to reduce the cash working capital.

Q. Did I&E make any additional recommendations?

A. Yes, in I&E Statement No. 3 (the direct testimony of Ethan H. Cline), I&E recommended that the Company provide an update to Exhibit A – FTY, Schedule C-2 by February 1, 2027 to include actual capital expenditures, plant additions, and retirements by month for the 12 months ending September 30, 2026, and then again for actuals through October 31, 2027 by February 1, 2028, to evaluate the validity of the Company's projections.

Q. Do you agree with I&E's recommendation for this filing requirement?

A. If directed by the Commission or otherwise required in this proceeding, the Company will provide an update of actual plant balances for the FTY and FPFTY through October 31, 2027.

Q. Does this conclude your rebuttal testimony at this time?

A. Yes.

NATIONAL FUEL STATEMENT NO. 7

MICHAEL J. MAGGIOLI

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 7

Direct Testimony of
Michael J. Maggioli

Topics Addressed: Balance Sheet and Historic O&M Expense

Dated: January 28, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Michael J. Maggioli. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. By whom and in what capacity are you employed?

A. I am employed by National Fuel Gas Distribution Corporation ("NFGDC") as a Lead Accountant in the Accounting department.

Q. Please provide your educational background.

A. I graduated from Canisius University in 2013 with a Bachelor of Science in Professional Accounting. I became a Certified Public Accountant in New York on December 16, 2015.

Q. Please provide your professional experience.

A. My full educational background and work experience are set forth in the attached National Fuel Exhibit MJM-1.

Q. Have you previously testified in other proceedings before the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission") or any other state or federal agency?

A. No.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your testimony.

A. I am providing testimony on behalf of NFGDC's Pennsylvania Division ("National Fuel" or the "Company") in support of its rate case accounting methodology.

Q. Are you sponsoring any exhibits or filing requirements in this proceeding?

A. Yes, I am sponsoring National Fuel Exhibit MJM-1.

Q. Would additional explanation be helpful concerning any of these exhibits?

A. Concerning the balance sheet exhibits, it should be noted that the balances presented reflect the combined financial position of NFGDC's New York and Pennsylvania jurisdictions. Wherever possible, we have reported the results of National Fuel only. Each exhibit lists the source and scope of the information it presents.

III. ACCOUNTING PROCESS AND HISTORIC COSTS

Q. How are the accounting records of National Fuel maintained?

A. The accounting records of National Fuel are kept in accordance with generally accepted accounting principles and the Federal Energy Regulatory Commission's Uniform System of Accounts as required under the provisions of 52 Pa. Code §59.42.

Q. Are the books and records of National Fuel subject to audit?

A. Yes, the books and records of National Fuel are audited by its internal auditors. In addition, National Fuel's books and records are included in consolidated audits of

National Fuel Gas Company performed by its external auditor, PriceWaterhouseCoopers. The Company's books and records are further subject to audit by the PAPUC.

Q. Does this conclude your direct testimony at this time?

A. Yes.

NATIONAL FUEL EXHIBIT MJM-1

MICHAEL J. MAGGIOLI RESUME

M. Joseph Maggioli

Lead Accountant – Accounting

Work Experience

February 2024 – Current	Lead Accountant – Accounting National Fuel Gas Distribution Corporation – Williamsville, NY
August 2021 – February 2024	Senior Accountant – Accounting National Fuel Gas Distribution Corporation – Williamsville, NY
May 2021– August 2021	Vice President– Treasury Controllers Citigroup – Getzville, NY
December 2017– May 2021	Finance Reporting Senior Analyst– NAM Controllers Citigroup – Getzville, NY
November 2015 – December 2017	Financial Accounting Analyst III – Balance Sheet Substantiation Citigroup – Getzville, NY
August 2014 – October 2015	Financial Accounting Analyst II – Balance Sheet Substantiation Citigroup – Getzville, NY
July 2013 – June 2014	Staff Accountant Skrobacz & Company, CPAs – Buffalo, NY

Education

B.S. Professional Accounting – Canisius University, Buffalo, NY

Certified Public Accountant in New York

NATIONAL FUEL STATEMENT NO. 8

JOHN J. SPANOS

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 8

Direct Testimony of
John J. Spanos

Topics Addressed: Depreciation

Dated: January 28, 2026

Q. Please state your name and address.

A. John J. Spanos. My business address is 300 Sterling Parkway, Mechanicsburg, Pennsylvania, 17050 (formerly 207 Senate Avenue, Camp Hill, Pennsylvania, 17011).

Q. With what firm are you associated and in what capacity?

A. I am associated with the firm of Gannett Fleming Valuation and Rate Consultants, LLC (Gannett Fleming) as President.

Q. How long have you been associated with Gannett Fleming?

A. I have been associated with the firm since June 1986.

Q. What is your educational background?

A. I have Bachelor of Science degrees in Industrial Management and Mathematics from Carnegie-Mellon University and a Master of Business Administration from York College of Pennsylvania.

Q. Are you a member of any professional societies?

A. Yes. I am a member and past President of the Society of Depreciation Professionals. I am also a member of the American Gas Association/Edison Electric Institute Industry Accounting Committee.

Q. Have you taken the certification examination for depreciation professionals?

A. Yes, I passed the certification examination of the Society of Depreciation Professionals in September 1997 and was recertified in August 2003, February 2008, January 2013, February 2018 and February 2023.

Q. Will you outline your experience in the field of depreciation?

A. I have over 39 years of depreciation experience, which includes expert testimony in more than 500 cases before approximately 47 regulatory commissions, including this Commission. These cases have included depreciation studies in the electric, gas, water, wastewater, and pipeline industries. In addition to cases where I have submitted testimony, I have also supervised over 900 other depreciation or valuation assignments. Please refer to Appendix A for my qualifications statement, which includes further information with respect to my work history, case experience, and leadership in the Society of Depreciation Professionals.

Q. What is the purpose of your testimony?

A. My testimony is in support of the depreciation studies conducted under my direction and supervision for the gas plant of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company").

Q. Have you prepared exhibits presenting the results of your studies?

A. Yes. National Fuel Exhibit C - Historic presents the results of the depreciation study as of September 30, 2025. National Fuel Exhibit C - Future presents the results of the depreciation study as of September 30, 2026. National Fuel Exhibit C – Fully Projected

presents the results of the depreciation study as of October 31, 2027. In addition, I am responsible for the responses to the following filing requirements pertaining to depreciation under Section 53.53(a)(1) of the Commission's regulations: III.D.17 and III.K.1 through III.K.9.

Q. Please describe Exhibit Nos. C-Historic, C-Future and C-Fully Projected.

A. Exhibit No. C-Historic, titled "2025 Depreciation Study - Calculated Annual Depreciation Accruals Related to Gas Plant as of September 30, 2025," includes the results of the depreciation study as related to the original cost as of September 30, 2025. The report also includes the detailed depreciation calculations. Exhibit No. C-Future, titled "2026 Depreciation Study - Calculated Annual Depreciation Accruals Related to Gas Plant as of September 30, 2026," includes the results of the depreciation study as related to the estimated original cost as of September 30, 2026. The report also includes explanatory text, statistics related to the estimation of service life, and the detailed depreciation calculations. Exhibit No. C-Fully Projected, titled "2027 Depreciation Study – Calculated Annual Depreciation Accruals Related to Gas Plant as of October 31, 2027," includes the results of the depreciation study as related to the estimated original cost as of October 31, 2027.

Q. What were the purposes of your depreciation studies?

A. The purposes of the depreciation studies were to estimate the annual depreciation accruals related to gas plant in service for ratemaking purposes and, using Commission-

approved procedures, to estimate the Company's book reserve at September 30, 2026 and October 31, 2027.

Q. Is the Company's claim for annual depreciation in the current proceeding based on the same methods of depreciation as were used in its most recent Annual Depreciation Report including service life study filed in May 2023?

A. Yes, it is. For most plant accounts, the current claim for annual depreciation is based on the straight-line remaining life method of depreciation, which has been used for over thirty years. For Accounts 391.1, 391.2, 391.3, 394 and 397, the claim is based on the straight-line remaining life method of amortization. The accounts have a large number of units, but small asset values representing slightly less than 3 percent of the depreciable plant. The assets represent items located in office buildings, service centers, garages, and warehouses. Given the difficulty in maintaining accounting records for these numerous assets and high cost for periodic inventories, retirements are recorded when a vintage is fully amortized, rather than as the units are removed from service. All units are retired when the age of the vintage reaches the amortization period. The annual amortization is based on amortization accounting which distributes the unrecovered cost of fixed capital assets over the remaining amortization period selected for each account.

Q. What group procedure is being used in this proceeding for depreciable accounts?

A. The average service life procedure is used in the current proceeding for plant installed prior to 1982 and the equal life group procedure for 1982 and subsequent vintages. This

calculation has been used in the same manner as the Company's most recent annual depreciation reports.

Q. Is the Company's claim for accrued depreciation in the current proceeding made on the same basis as has been used for over thirty years?

A. Yes. The current claim for accrued depreciation is the book reserve brought forward from the book reserve approved by the Commission in the last proceeding.

Q. How was the book reserve used in the calculation of annual depreciation?

A. The book reserve by account was allocated to vintages to determine original cost less accrued depreciation by vintage. The total annual accrual is the sum of the results of dividing the original costs less accrued depreciation by the vintage composite remaining lives.

Q. How was the book reserve as of September 30, 2026, estimated?

A. The book reserve as of September 30, 2026, by account, was projected by adding estimated accruals, gross salvage, and the amortization of net salvage, and subtracting estimated retirements and cost of removal from the book reserve as of September 30, 2025. Annual accruals were estimated using the annual accruals calculated as of September 30, 2025. For most accounts, gross salvage and cost of removal were estimated by (1) expressing actual gross salvage and cost of removal as a percent of retirements by account, for the most recent five-year period, and (2) applying those percents to the projected retirements by account. For the purpose of calculating the

annual accruals, the projected book reserve by account was allocated to vintages based on calculated accrued depreciation as of September 30, 2026.

Q. Was the book reserve as of October 31, 2027, estimated using the same methodology?

A. Yes.

Q. Has a service life study of the Company's gas utility property been performed?

A. Yes. The most recent service life study was performed as of September 2022. The service life study is the basis for the service lives I used to calculate annual accruals. Service life studies are required in Pennsylvania every five years as the next one will be performed in 2028 for data through September 30, 2027.

Q. Briefly outline the procedure used in performing the service life study.

A. The service life study consisted of assembling and compiling historical data from the records related to the gas utility plant of the Company; statistically analyzing such data to obtain historical trends of survivor characteristics; obtaining supplementary information from management and operating personnel concerning Company practices and plans as they relate to plant operations; and interpreting the above data to form judgments of service life characteristics.

Iowa type survivor curves were used to describe the estimated survivor characteristics of the mass property groups. Individual service lives were used for major individual units of plant, such as distribution buildings, housing offices, and shops. The

life span concept was recognized by coordinating the lives of associated plant installed in subsequent years with the probable retirement date defined by the life estimated for the major unit.

Q. What statistical data were employed in the historical analyses performed for the purpose of estimating service life characteristics?

A. The data consisted of the entries made to record retirements and other transactions related to the gas plant during the period 1960-2022. These entries were classified by depreciable group, type of transaction, the year in which the transaction took place, and the year in which the plant was installed. Types of transactions included in the data were plant additions, retirements, transfers, and balances. In the presentation of service life statistics, only the significant exposure points that were utilized in determining survivor curves were plotted. This process is utilized to show my judgment in service life determinations.

Q. What was the source of this data?

A. They were assembled from Company records related to its gas plant in service.

Q. Were the methods used in the service life study the same as those used in other depreciation studies for gas utility plant presented before this Commission?

A. Yes. The methods are the same ones that have been presented previously for National Fuel Gas Distribution Corporation and for other gas companies before the Pennsylvania

Public Utility Commission and that have been accepted by the Commission in its past orders concerning gas utilities.

Q. What approach did you use to estimate the lives of significant structures such as office buildings and service centers?

A. I used the life span technique to estimate the lives of significant structures. In this technique, the survivor characteristics of the structures are described by the use of interim survivor curves and estimated probable retirement dates. The interim survivor curve describes the rate of retirement related to the replacement of elements of the structure such as plumbing, heating, doors, windows, roofs, etc. that occur during the life of the facility. The probable retirement date provides the rate of final retirement for each year of installation for the structure by truncating the interim survivor curve for each installation year at its attained age at the date of probable retirement. The use of interim survivor curves truncated at the date of probable retirement provides a consistent method for estimating the lives of the several years of installation inasmuch as concurrent retirement of all years of installation will occur when the structure is retired.

Q. Has your firm used this approach in other proceedings before this Commission?

A. Yes, we have used the life span technique on many occasions before the Pennsylvania Public Utility Commission.

Q. What are the bases for the probable retirement years that you have estimated for each structure?

A. The bases for the estimates of probable retirement years are life spans for each structure that are based on judgment and incorporate consideration of the age, use, size, nature of construction, management outlook and typical life spans experienced and used by other gas utilities for similar structures. Most of the life spans result in probable retirement dates that are many years in the future. As a result, the retirement of these structures is not yet subject to specific management plans. Such plans would be premature. At the appropriate time, studies of the economics of rehabilitation and continued use or retirement of the structure will be analyzed, and the results incorporated in the estimation of the structure's life span.

Q. Are the factors considered in your estimates of service life presented in Exhibit No. C-Future?

A. Yes. A discussion of the factors considered in the estimation of service lives is presented by account on pages III-2 through III-7 of Exhibit No. C-Future.

Q. Were there any material changes to life characteristics as a result of this rate proceeding?

A. No. There was no material change in the life estimate for plant accounts or subaccounts in this rate proceeding. All life estimates were based on the recent annual depreciation report and the service life study that was conducted.

Q. Please outline the contents of Exhibit No. C-Future.

A. Exhibit No. C-Future is presented in eight parts. Part I, Introduction, sets forth the scope and basis of the study. Part II, Estimation of Survivor Curves, includes a description of the Iowa Curves and the formulation of the retirement rate method. Part III, Service Life Considerations, and Part IV, Calculation of Annual and Accrued Depreciation, include a description of the judgment utilized for life parameters and the explanation of depreciation procedures.

Part V, Results of Study, presents a description of the results and summaries of the depreciation calculations. Part VI, Service Life Statistics, presents the graphs and tables which relate to the service life study. Part VII, Detailed Depreciation Calculations, sets forth the detailed depreciation calculations by account. Part VIII, Experienced and Estimated Net Salvage, presents the cost of removal and gross salvage by account for the years 2022 through 2026.

Table 1, pages V-4 and V-5, presents the estimated survivor curve, the original cost as of September 30, 2026, and the book reserve and calculated annual depreciation for each account or subaccount of gas plant. Table 2 on page V-6 presents the bringforward to September 30, 2026, of the book depreciation reserve as of September 30, 2025. Table 3 on page V-7 sets forth the calculation of the annual accruals used in the bringforward. Table 4, page V-8, presents the experienced and estimated net salvage during the five-year period, 2022 through 2026.

The section beginning on page VI-1 presents the results of the retirement rate analyses prepared as the historical bases for the service life estimates. The section beginning on page VII-1 presents the depreciation calculations related to original cost. The tabulation on pages VII-3 through VII-5 presents the cumulative depreciated original

cost by year installed. The tabulations on pages VII-7 through VII-60 present the calculation of annual depreciation by vintage by account for each depreciable group of utility plant.

Q. Please outline the contents of Exhibit No. C-Fully Projected.

A. Exhibit No. C-Fully Projected includes a description of the results, summaries of the depreciation calculations, and the detailed depreciation calculations as of October 31, 2027. The descriptions and explanations presented in Exhibit No. C-Future are also applicable to the depreciation calculations presented in Exhibit No. C-Fully Projected. The graphs and tables related to service life presented in Exhibit No. C-Future also support the service life estimates used in Exhibit No. C-Fully Projected inasmuch as the estimates are the same for both test years. The summary tables and detailed depreciation calculations as of October 31, 2027 are organized and presented in the same manner as those as of September 30, 2026.

Q. Please outline the contents of Exhibit No. C-Historic.

A. Exhibit No. C-Historic includes a description of the results, summaries of the depreciation calculations, and the detailed depreciation calculations as of September 30, 2025. The descriptions and explanations presented in Exhibit No. C-Future are also applicable to the depreciation calculations presented in Exhibit No. C-Historic. The graphs and tables related to service life presented in Exhibit No. C-Future also support the service life estimates used in Exhibit No. C-Historic, inasmuch as the estimates are the same for both test years. The summary tables and detailed depreciation calculations

as of September 30, 2025, are organized and presented in the same manner as those as of September 30, 2026.

Q. Please use an example to illustrate the manner in which the study is presented in Exhibit Nos. C-Historic, C-Future and C-Fully Projected.

A. I will use Account 376.1, Mains – Excluding Cathodic Protection, as my example, inasmuch as it is the largest depreciable group and represents 45 percent of the original cost of depreciable gas plant as of September 30, 2026.

The retirement rate method was used to analyze the survivor characteristics of this group. The life tables for the 1960-2022 and 1993-2022 experience bands are presented on pages VI-48 through VI-55 of Exhibit No. C-Future. The life tables, or original survivor curve, are plotted along with the estimated smooth survivor curve, the 70-L1.5, on page VI-47.

The calculations of the annual depreciation related to the original cost as of September 30, 2025, of gas plant are presented by type main on pages II-38 through II-40 of Exhibit No. C-Historic. The calculation is based on the 70-L1.5 survivor curve, the attained age, and the allocated book reserve. The calculations as of September 30, 2026, are presented by type main on pages VII-37 through VII-39 of Exhibit No. C-Future and are based in part on the bringforward of the book reserve. Also, the calculations as of October 31, 2027 are presented by type main on pages II-36 through II-38 of Exhibit No. C-Fully Projected and are based in part on the bringforward of the book reserve. The tabulations in Exhibit Nos. C-Historic, C-Future and C-Fully Projected set forth the installation year, the original cost, calculated accrued depreciation, allocated book

reserve, future accruals, remaining life, and annual accrual. The totals are brought forward to Table 1 on page I-3 in Exhibit No. C-Historic, page V-4 in Exhibit No. C-Future and on page I-3 in Exhibit No. C-Fully Projected.

Q. In what manner is net salvage incorporated in the depreciation calculations?

A. As stated on page IV-9 of Exhibit No. C-Future, no adjustment for net salvage was made to the calculated annual depreciation amounts. The total calculated annual depreciation set forth on page I-5 of Exhibit No. C-Historic, page V-8 of Exhibit No. C-Future and on page I-7 of Exhibit No. C-Fully Projected should include an addition for the amortization of negative net salvage in accordance with the practice of this Commission. The amortization is based on experience during the period 2021 through 2025 for the calculation as of September 30, 2025, and on experience during the period 2022 through September 30, 2025, plus estimates for the twelve months ended September 30, 2026 for the calculation as of September 30, 2026.

The amortization for the October 31, 2027 calculation is based on experience during the period 2023 through September 30, 2025, plus estimates for the period October 2025 through September 2027. The amounts of the five-year amortizations are calculated in Table 2 on page I-5 of Exhibit No. C-Historic, in Table 4 on page V-9 of Exhibit No. C-Future and in Table 8 on page I-8 of Exhibit No. C-Fully Projected.

Q. Have you provided a monthly bringforward to October 31, 2027, of the plant and book depreciation reserve as of September 30, 2026?

A. Yes, Exhibit Nos. JJS-01 and JJS-02 at the end of this testimony provide the monthly detail of the plant in service, book depreciation reserve, and the calculated depreciation. These exhibits agree with the fully projected future test year plant and reserve balances as shown on Exhibit No. C-Fully Projected, Table 1 on pages I-3 and I-4.

Q. Does this complete your testimony at this time?

A. Yes, it does.

Appendix A

JOHN SPANOS

DEPRECIATION EXPERIENCE

Q. Please state your name.

A. My name is John J. Spanos.

Q. What is your educational background?

A. I have Bachelor of Science degrees in Industrial Management and Mathematics from Carnegie-Mellon University and a Master of Business Administration from York College.

Q. Do you belong to any professional societies?

A. Yes. I am a member and past President of the Society of Depreciation Professionals and a member of the American Gas Association/Edison Electric Institute Industry Accounting Committee.

Q. Do you hold any special certification as a depreciation expert?

A. Yes. The Society of Depreciation Professionals has established national standards for depreciation professionals. The Society administers an examination to become certified in this field. I passed the certification exam in September 1997 and was recertified in August 2003, February 2008, January 2013, February 2018 and February 2023.

Q. Please outline your experience in the field of depreciation.

A. In June 1986, I was employed by Gannett Fleming Valuation and Rate Consultants, Inc. as a Depreciation Analyst. During the period from June 1986 through December 1995, I helped prepare numerous depreciation and original cost studies for utility companies in various industries. I helped perform depreciation studies for the following telephone companies: United Telephone of Pennsylvania, United Telephone of New Jersey, and Anchorage Telephone Utility. I helped perform depreciation studies for the following companies in

the railroad industry: Union Pacific Railroad, Burlington Northern Railroad, and Wisconsin Central Transportation Corporation.

I helped perform depreciation studies for the following organizations in the electric utility industry: Chugach Electric Association, The Cincinnati Gas and Electric Company (CG&E), The Union Light, Heat and Power Company (ULH&P), Northwest Territories Power Corporation, and the City of Calgary - Electric System.

I helped perform depreciation studies for the following pipeline companies: TransCanada Pipelines Limited, Trans Mountain Pipe Line Company Ltd., Interprovincial Pipe Line Inc., Nova Gas Transmission Limited and Lakehead Pipeline Company.

I helped perform depreciation studies for the following gas utility companies: Columbia Gas of Pennsylvania, Columbia Gas of Maryland, The Peoples Natural Gas Company, T. W. Phillips Gas & Oil Company, CG&E, ULH&P, Lawrenceburg Gas Company and Penn Fuel Gas, Inc.

I helped perform depreciation studies for the following water utility companies: Indiana-American Water Company, Consumers Pennsylvania Water Company and The York Water Company; and depreciation and original cost studies for Philadelphia Suburban Water Company and Pennsylvania-American Water Company.

In each of the above studies, I assembled and analyzed historical and simulated data, performed field reviews, developed preliminary estimates of service life and net salvage, calculated annual depreciation, and prepared reports for submission to state public utility commissions or federal regulatory agencies. I performed these studies under the general direction of William M. Stout, P.E.

In January 1996, I was assigned to the position of Supervisor of Depreciation Studies. In July 1999, I was promoted to the position of Manager, Depreciation and

Valuation Studies. In December 2000, I was promoted to the position as Vice-President of Gannett Fleming Valuation and Rate Consultants, Inc., in April 2012, I was promoted to the position as Senior Vice President of the Valuation and Rate Division of Gannett Fleming Inc. (now doing business as Gannett Fleming Valuation and Rate Consultants, LLC) and in January of 2019, I was promoted to my present position of President of Gannett Fleming Valuation and Rate Consultants, LLC. In my current position I am responsible for conducting all depreciation, valuation and original cost studies, including the preparation of final exhibits and responses to data requests for submission to the appropriate regulatory bodies.

Since January 1996, I have conducted depreciation studies similar to those previously listed including assignments for Pennsylvania-American Water Company; Aqua Pennsylvania; Kentucky-American Water Company; Virginia-American Water Company; Indiana-American Water Company; Iowa-American Water Company; New Jersey-American Water Company; Hampton Water Works Company; Omaha Public Power District; Enbridge Pipe Line Company; Inc.; Columbia Gas of Virginia, Inc.; Virginia Natural Gas Company National Fuel Gas Distribution Corporation - New York and Pennsylvania Divisions; The City of Bethlehem - Bureau of Water; The City of Coatesville Authority; The City of Lancaster - Bureau of Water; Peoples Energy Corporation; The York Water Company; Public Service Company of Colorado; Enbridge Pipelines; Enbridge Gas Distribution, Inc.; Reliant Energy-HLP; Massachusetts-American Water Company; St. Louis County Water Company; Missouri-American Water Company; Chugach Electric Association; Alliant Energy; Oklahoma Gas & Electric Company; Nevada Power Company; Dominion Virginia Power; NUI-Virginia Gas Companies; Pacific Gas & Electric Company; PSI Energy; NUI - Elizabethtown Gas Company; Cinergy Corporation – CG&E; Cinergy

Corporation – ULH&P; Columbia Gas of Kentucky; South Carolina Electric & Gas Company; Idaho Power Company; El Paso Electric Company; Aqua North Carolina; Aqua Ohio; Aqua Texas, Inc.; Aqua Illinois, Inc.; Ameren Missouri; Central Hudson Gas & Electric; Centennial Pipeline Company; CenterPoint Energy-Arkansas; CenterPoint Energy – Oklahoma; CenterPoint Energy – Entex; CenterPoint Energy - Louisiana; NSTAR – Boston Edison Company; Westar Energy, Inc.; United Water Pennsylvania; PPL Electric Utilities; PPL Gas Utilities; Wisconsin Power & Light Company; TransAlaska Pipeline; Avista Corporation; Northwest Natural Gas; Allegheny Energy Supply, Inc.; Public Service Company of North Carolina; South Jersey Gas Company; Duquesne Light Company; MidAmerican Energy Company; Laclede Gas; Duke Energy Company; E.ON U.S. Services Inc.; Elkton Gas Services; Anchorage Water and Wastewater Utility; Kansas City Power and Light; Duke Energy North Carolina; Duke Energy South Carolina; Monongahela Power Company; Potomac Edison Company; Duke Energy Ohio Gas; Duke Energy Kentucky; Duke Energy Indiana; Duke Energy Progress; Northern Indiana Public Service Company; Tennessee- American Water Company; Columbia Gas of Maryland; Maryland-American Water Company; Bonneville Power Administration; NSTAR Electric and Gas Company; EPCOR Distribution, Inc.; B. C. Gas Utility, Ltd; Entergy Arkansas; Entergy Texas; Entergy Mississippi; Entergy Louisiana; Entergy Gulf States Louisiana; the Borough of Hanover; Louisville Gas and Electric Company; Kentucky Utilities Company; Madison Gas and Electric; Central Maine Power; PEPCO; PacifiCorp; Minnesota Energy Resource Group; Jersey Central Power & Light Company; Cheyenne Light, Fuel and Power Company; United Water Arkansas; Central Vermont Public Service Corporation; Green Mountain Power; Portland General Electric Company; Atlantic City Electric; Nicor Gas Company; Black Hills Power; Black Hills Colorado Gas; Black Hills Energy Arkansas, Inc.; Black Hills Kansas

Gas; Black Hills Service Company; Black Hills Utility Holdings; Public Service Company of Oklahoma; City of Dubois; Peoples Gas Light and Coke Company; North Shore Gas Company; Connecticut Light and Power; New York State Electric and Gas Corporation; Rochester Gas and Electric Corporation; Greater Missouri Operations; Tennessee Valley Authority; Omaha Public Power District; Indianapolis Power & Light Company; Vermont Gas Systems, Inc.; Metropolitan Edison; Pennsylvania Electric; West Penn Power; Pennsylvania Power; PHI Service Company - Delmarva Power and Light; Atmos Energy Corporation; Citizens Energy Group; PSE&G Company; Berkshire Gas Company; Alabama Gas Corporation; Mid-Atlantic Interstate Transmission, LLC; SUEZ Water; WEC Energy Group; Rocky Mountain Natural Gas, LLC; Illinois-American Water Company; Northern Illinois Gas Company; Public Service of New Hampshire; FirstEnergy Service Corporation; Northeast Ohio Natural Gas Corporation; Blue Granite Water Company; Spire Missouri, Inc.; Dominion Energy South Carolina, Inc.; South FirstEnergy Operating Companies; Dayton Power and Light Company; Liberty Utilities; East Kentucky Power Cooperative; Bangor Natural Gas; Hanover Borough Municipal Water Works; West Virginia American Water Company; Evergy Metro; Evergy Missouri West; Granite State Electric; Bluegrass Water; The Borough of Ambler; Newtown Artesian Water Company and Connecticut Water Company.

My additional duties include determining final life and salvage estimates, conducting field reviews, presenting recommended depreciation rates to management for its consideration and supporting such rates before regulatory bodies.

Q. Have you submitted testimony to any state utility commission on the subject of utility plant depreciation?

A. Yes. I have submitted testimony to the Pennsylvania Public Utility Commission; the

Commonwealth of Kentucky Public Service Commission; the Public Utilities Commission of Ohio; the Nevada Public Utility Commission; the Public Utilities Board of New Jersey; the Missouri Public Service Commission; the Massachusetts Department of Telecommunications and Energy; the Alberta Energy & Utility Board; the Idaho Public Utility Commission; the Louisiana Public Service Commission; the State Corporation Commission of Kansas; the Oklahoma Corporate Commission; the Public Service Commission of South Carolina; Railroad Commission of Texas – Gas Services Division; the New York Public Service Commission; Illinois Commerce Commission; the Indiana Utility Regulatory Commission; the California Public Utilities Commission; the Federal Energy Regulatory Commission ("FERC"); the Arkansas Public Service Commission; the Public Utility Commission of Texas; Maryland Public Service Commission; Washington Utilities and Transportation Commission; The Tennessee Regulatory Commission; the Regulatory Commission of Alaska; Minnesota Public Utility Commission; Utah Public Service Commission; District of Columbia Public Service Commission; the Mississippi Public Service Commission; Delaware Public Service Commission; Virginia State Corporation Commission; Colorado Public Utility Commission; Oregon Public Utility Commission; South Dakota Public Utilities Commission; Wisconsin Public Service Commission; Wyoming Public Service Commission; the Public Service Commission of West Virginia; Maine Public Utility Commission; Iowa Utility Board; Connecticut Public Utilities Regulatory Authority; New Mexico Public Regulation Commission; Commonwealth of Massachusetts Department of Public Utilities; Rhode Island Public Utilities Commission and the North Carolina Utilities Commission.

Q. Have you had any additional education relating to utility plant depreciation?

A. Yes. I have completed the following courses conducted by Depreciation Programs, Inc.:

"Techniques of Life Analysis," "Techniques of Salvage and Depreciation Analysis," "Forecasting Life and Salvage," "Modeling and Life Analysis Using Simulation," and "Managing a Depreciation Study." I have also completed the "Introduction to Public Utility Accounting" program conducted by the American Gas Association.

Q. Does this conclude your qualification statement?

A. Yes.

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY

	Year	Jurisdiction	Docket No.	Client Utility	Subject
01.	1998	PA PUC	R-00984375	City of Bethlehem – Bureau of Water	Original Cost and Depreciation
02.	1998	PA PUC	R-00984567	City of Lancaster	Original Cost and Depreciation
03.	1999	PA PUC	R-00994605	The York Water Company	Depreciation
04.	2000	D.T.&E.	DTE 00-105	Massachusetts-American Water Company	Depreciation
05.	2001	PA PUC	R-00016114	City of Lancaster	Original Cost and Depreciation
06.	2001	PA PUC	R-00017236	The York Water Company	Depreciation
07.	2001	PA PUC	R-00016339	Pennsylvania-American Water Company	Depreciation
08.	2001	OH PUC	01-1228-GA-AIR	Cinergy Corp – Cincinnati Gas & Elect Company	Depreciation
09.	2001	KY PSC	2001-092	Cinergy Corp – Union Light, Heat & Power Co.	Depreciation
10.	2002	PA PUC	R-00016750	Philadelphia Suburban Water Company	Depreciation
11.	2002	KY PSC	2002-00145	Columbia Gas of Kentucky	Depreciation
12.	2002	NJ BPU	GF02040245	NUI Corporation/Elizabethtown Gas Company	Depreciation
13.	2002	ID PUC	IPC-E-03-7	Idaho Power Company	Depreciation
14.	2003	PA PUC	R-0027975	The York Water Company	Depreciation
15.	2003	IN URC	R-0027975	Cinergy Corp – PSI Energy, Inc.	Depreciation
16.	2003	PA PUC	R-00038304	Pennsylvania-American Water Company	Depreciation
17.	2003	MO PSC	WR-2003-0500	Missouri-American Water Company	Depreciation
18.	2003	FERC	ER03-1274-000	NSTAR-Boston Edison Company	Depreciation
19.	2003	NJ BPU	BPU 03080683	South Jersey Gas Company	Depreciation
20.	2003	NV PUC	03-10001	Nevada Power Company	Depreciation
21.	2003	LA PSC	U-27676	CenterPoint Energy – Arkla	Depreciation
22.	2003	PA PUC	R-00038805	Pennsylvania Suburban Water Company	Depreciation
23.	2004	AB En/Util Bd	1306821	EPCOR Distribution, Inc.	Depreciation
24.	2004	PA PUC	R-00038168	National Fuel Gas Distribution Corp (PA)	Depreciation
25.	2004	PA PUC	R-00049255	PPL Electric Utilities	Depreciation
26.	2004	PA PUC	R-00049165	The York Water Company	Depreciation
27.	2004	OK Corp Cm	PUC 200400187	CenterPoint Energy – Arkla	Depreciation
28.	2004	OH PUC	04-680-El-AIR	Cinergy Corp. – Cincinnati Gas and Electric Company	Depreciation
29.	2004	RR Com of TX	GUD#	CenterPoint Energy – Entex Gas Services Div.	Depreciation
30.	2004	NY PUC	04-G-1047	National Fuel Gas Distribution Gas (NY)	Depreciation
31.	2004	AR PSC	04-121-U	CenterPoint Energy – Arkla	Depreciation
32.	2005	IL CC	05-ICC-06	North Shore Gas Company	Depreciation
33.	2005	IL CC	05-ICC-06	Peoples Gas Light and Coke Company	Depreciation
34.	2005	KY PSC	2005-00042	Union Light Heat & Power	Depreciation

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY, cont.

	Year	Jurisdiction	Docket No.	Client Utility	Subject
35.	2005	IL CC	05-0308	MidAmerican Energy Company	Depreciation
36.	2005	MO PSC	GF-2005	Laclede Gas Company	Depreciation
37.	2005	KS CC	05-WSEE-981-RTS	Westar Energy	Depreciation
38.	2005	RR Com of TX	GUD #	CenterPoint Energy – Entex Gas Services Div.	Depreciation
39.	2005	US District Court	Cause No. 1:99-CV-1693-LJM/VSS	Cinergy Corporation	Accounting
40.	2005	OK CC	PUD 200500151	Oklahoma Gas and Electric Company	Depreciation
41.	2005	MA Dept Tele-com & Ergy	DTE 05-85	NSTAR	Depreciation
42.	2005	NY PUC	05-E-934/05-G-0935	Central Hudson Gas & Electric Company	Depreciation
43.	2005	AK Reg Com	U-04-102	Chugach Electric Association	Depreciation
44.	2005	CA PUC	A05-12-002	Pacific Gas & Electric	Depreciation
45.	2006	PA PUC	R-00051030	Aqua Pennsylvania, Inc.	Depreciation
46.	2006	PA PUC	R-00051178	T.W. Phillips Gas and Oil Company	Depreciation
47.	2006	NC Util Cm.	G-5, Sub522	Pub. Service Company of North Carolina	Depreciation
48.	2006	PA PUC	R-00051167	City of Lancaster	Depreciation
49.	2006	PA PUC	R00061346	Duquesne Light Company	Depreciation
50.	2006	PA PUC	R-00061322	The York Water Company	Depreciation
51.	2006	PA PUC	R-00051298	PPL GAS Utilities	Depreciation
52.	2006	PUC of TX	32093	CenterPoint Energy – Houston Electric	Depreciation
53.	2006	KY PSC	2006-00172	Duke Energy Kentucky	Depreciation
54.	2006	SC PSC		SCANA	Accounting
55.	2006	AK Reg Com	U-06-6	Municipal Light and Power	Depreciation
56.	2006	DE PSC	06-284	Delmarva Power and Light	Depreciation
57.	2006	IN URC	IURC43081	Indiana American Water Company	Depreciation
58.	2006	AK Reg Com	U-06-134	Chugach Electric Association	Depreciation
59.	2006	MO PSC	WR-2007-0216	Missouri American Water Company	Depreciation
60.	2006	FERC	IS05-82-002, et al	TransAlaska Pipeline	Depreciation
61.	2006	PA PUC	R-00061493	National Fuel Gas Distribution Corp. (PA)	Depreciation
62.	2007	NC Util Com.	E-7 SUB 828	Duke Energy Carolinas, LLC	Depreciation
63.	2007	OH PSC	08-709-EL-AIR	Duke Energy Ohio Gas	Depreciation
64.	2007	PA PUC	R-00072155	PPL Electric Utilities Corporation	Depreciation
65.	2007	KY PSC	2007-00143	Kentucky American Water Company	Depreciation

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY, cont.

	Year	Jurisdiction	Docket No.	Client Utility	Subject
66.	2007	PA PUC	R-00072229	Pennsylvania American Water Company	Depreciation
67.	2007	KY PSC	2007-0008	NiSource – Columbia Gas of Kentucky	Depreciation
68.	2007	NY PSC	07-G-0141	National Fuel Gas Distribution Corp (NY)	Depreciation
69.	2008	AK PSC	U-08-004	Anchorage Water & Wastewater Utility	Depreciation
70.	2008	TN Reg Auth	08-00039	Tennessee-American Water Company	Depreciation
71.	2008	DE PSC	08-96	Artesian Water Company	Depreciation
72.	2008	PA PUC	R-2008-2023067	The York Water Company	Depreciation
73.	2008	KS CC	08-WSEE1-RTS	Westar Energy	Depreciation
74.	2008	IN URC	43526	Northern Indiana Public Service Company	Depreciation
75.	2008	IN URC	43501	Duke Energy Indiana	Depreciation
76.	2008	MD PSC	9159	NiSource – Columbia Gas of Maryland	Depreciation
77.	2008	KY PSC	2008-000251	Kentucky Utilities	Depreciation
78.	2008	KY PSC	2008-000252	Louisville Gas & Electric	Depreciation
79.	2008	PA PUC	2008-20322689	Pennsylvania American Water Co. - Wastewater	Depreciation
80.	2008	NY PSC	08-E887/08-00888	Central Hudson	Depreciation
81.	2008	WV TC	VE-080416/VG-8080417	Avista Corporation	Depreciation
82.	2008	IL CC	ICC-09-166	Peoples Gas, Light and Coke Company	Depreciation
83.	2009	IL CC	ICC-09-167	North Shore Gas Company	Depreciation
84.	2009	DC PSC	1076	Potomac Electric Power Company	Depreciation
85.	2009	KY PSC	2009-00141	NiSource – Columbia Gas of Kentucky	Depreciation
86.	2009	FERC	ER08-1056-002	Entergy Services	Depreciation
87.	2009	PA PUC	R-2009-2097323	Pennsylvania American Water Company	Depreciation
88.	2009	NC Util Cm	E-7, Sub 090	Duke Energy Carolinas, LLC	Depreciation
89.	2009	KY PSC	2009-00202	Duke Energy Kentucky	Depreciation
90.	2009	VA St. CC	PUE-2009-00059	Aqua Virginia, Inc.	Depreciation
91.	2009	PA PUC	2009-2132019	Aqua Pennsylvania, Inc.	Depreciation
92.	2009	MS PSC	Docket No. 2011-UA-183	Entergy Mississippi	Depreciation
93.	2009	AK PSC	09-08-U	Entergy Arkansas	Depreciation
94.	2009	TX PUC	37744	Entergy Texas	Depreciation
95.	2009	TX PUC	37690	El Paso Electric Company	Depreciation
96.	2009	PA PUC	R-2009-2106908	The Borough of Hanover	Depreciation
97.	2009	KS CC	10-KCPE-415-RTS	Kansas City Power & Light	Depreciation
98.	2009	PA PUC	R-2009-	United Water Pennsylvania	Depreciation

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY, cont.

	Year	Jurisdiction	Docket No.	Client Utility	Subject
99.	2009	OH PUC		Aqua Ohio Water Company	Depreciation
100.	2009	WI PSC	3270-DU-103	Madison Gas & Electric Company	Depreciation
101.	2009	MO PSC	WR-2010	Missouri American Water Company	Depreciation
102.	2009	AK Reg Cm	U-09-097	Chugach Electric Association	Depreciation
103.	2010	IN URC	43969	Northern Indiana Public Service Company	Depreciation
104.	2010	WI PSC	6690-DU-104	Wisconsin Public Service Corp.	Depreciation
105.	2010	PA PUC	R-2010-2161694	PPL Electric Utilities Corp.	Depreciation
106.	2010	KY PSC	2010-00036	Kentucky American Water Company	Depreciation
107.	2010	PA PUC	R-2009-2149262	Columbia Gas of Pennsylvania	Depreciation
108.	2010	MO PSC	GR-2010-0171	Laclede Gas Company	Depreciation
109.	2010	SC PSC	2009-489-E	South Carolina Electric & Gas Company	Depreciation
110.	2010	NJ BD OF PU	ER09080664	Atlantic City Electric	Depreciation
111.	2010	VA St. CC	PUE-2010-00001	Virginia American Water Company	Depreciation
112.	2010	PA PUC	R-2010-2157140	The York Water Company	Depreciation
113.	2010	MO PSC	ER-2010-0356	Greater Missouri Operations Company	Depreciation
114.	2010	MO PSC	ER-2010-0355	Kansas City Power and Light	Depreciation
115.	2010	PA PUC	R-2010-2167797	T.W. Phillips Gas and Oil Company	Depreciation
116.	2010	PSC SC	2009-489-E	SCANA – Electric	Depreciation
117.	2010	PA PUC	R-2010-22010702	Peoples Natural Gas, LLC	Depreciation
118.	2010	AK PSC	10-067-U	Oklahoma Gas and Electric Company	Depreciation
119.	2010	IN URC	Cause No. 43894	Northern Indiana Public Serv. Company - NIFL	Depreciation
120.	2010	IN URC	Cause No. 43894	Northern Indiana Public Serv. Co. - Kokomo	Depreciation
121.	2010	PA PUC	R-2010-2166212	Pennsylvania American Water Co. - WW	Depreciation
122.	2010	NC Util Cn.	W-218,SUB310	Aqua North Carolina, Inc.	Depreciation
123.	2011	OH PUC	11-4161-WS-AIR	Ohio American Water Company	Depreciation
124.	2011	MS PSC	EC-123-0082-00	Entergy Mississippi	Depreciation
125.	2011	CO PUC	11AL-387E	Black Hills Colorado	Depreciation
126.	2011	PA PUC	R-2010-2215623	Columbia Gas of Pennsylvania	Depreciation
127.	2011	PA PUC	R-2010-2179103	City of Lancaster – Bureau of Water	Depreciation
128.	2011	IN URC	43114 IGCC 4S	Duke Energy Indiana	Depreciation
129.	2011	FERC	IS11-146-000	Enbridge Pipelines (Southern Lights)	Depreciation
130.	2011	IL CC	11-0217	MidAmerican Energy Corporation	Depreciation
131.	2011	OK CC	201100087	Oklahoma Gas & Electric Company	Depreciation
132.	2011	PA PUC	2011-2232243	Pennsylvania American Water Company	Depreciation

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY, cont.

	Year	Jurisdiction	Docket No.	Client Utility	Subject
133.	2011	FERC	RP11-___-000	Carolina Gas Transmission	Depreciation
134.	2012	WA UTC	UE-120436/UG-120437	Avista Corporation	Depreciation
135.	2012	AK Reg Cm	U-12-009	Chugach Electric Association	Depreciation
136.	2012	MA PUC	DPU 12-25	Columbia Gas of Massachusetts	Depreciation
137.	2012	TX PUC	40094	El Paso Electric Company	Depreciation
138.	2012	ID PUC	IPC-E-12	Idaho Power Company	Depreciation
139.	2012	PA PUC	R-2012-2290597	PPL Electric Utilities	Depreciation
140.	2012	PA PUC	R-2012-2311725	Borough of Hanover – Bureau of Water	Depreciation
141.	2012	KY PSC	2012-00222	Louisville Gas and Electric Company	Depreciation
142.	2012	KY PSC	2012-00221	Kentucky Utilities Company	Depreciation
143.	2012	PA PUC	R-2012-2285985	Peoples Natural Gas Company	Depreciation
144.	2012	DC PSC	Case 1087	Potomac Electric Power Company	Depreciation
145.	2012	OH PSC	12-1682-EL-AIR	Duke Energy Ohio (Electric)	Depreciation
146.	2012	OH PSC	12-1685-GA-AIR	Duke Energy Ohio (Gas)	Depreciation
147.	2012	PA PUC	R-2012-2310366	City of Lancaster – Sewer Fund	Depreciation
148.	2012	PA PUC	R-2012-2321748	Columbia Gas of Pennsylvania	Depreciation
149.	2012	FERC	ER-12-2681-000	ITC Holdings	Depreciation
150.	2012	MO PSC	ER-2012-0174	Kansas City Power and Light	Depreciation
151.	2012	MO PSC	ER-2012-0175	KCPL Greater Missouri Operations Company	Depreciation
152.	2012	MO PSC	GO-2012-0363	Laclede Gas Company	Depreciation
153.	2012	MN PUC	G007,001/D-12-533	Integrys – MN Energy Resource Group	Depreciation
154.	2012	TX PUC	SOAH 582-14-1051/ TECQ 2013-2007-UCR	Aqua Texas	Depreciation
155.	2012	PA PUC	2012-2336379	York Water Company	Depreciation
156.	2013	NJ BPU	ER12121071	PHI Service Company– Atlantic City Electric	Depreciation
157.	2013	KY PSC	2013-00167	Columbia Gas of Kentucky	Depreciation
158.	2013	VA St CC	2013-00020	Virginia Electric and Power Company	Depreciation
159.	2013	IA Util Bd	2013-0004	MidAmerican Energy Corporation	Depreciation
160.	2013	PA PUC	2013-2355276	Pennsylvania American Water Company	Depreciation
161.	2013	NY PSC	13-E-0030, 13-G-0031, 13-S-0032	Consolidated Edison of New York	Depreciation
162.	2013	PA PUC	2013-2355886	Peoples TWP LLC	Depreciation
163.	2013	TN Reg Auth	12-0504	Tennessee American Water	Depreciation
164.	2013	ME PUC	2013-168	Central Maine Power Company	Depreciation
165.	2013	DC PSC	Case 1103	PHI Service Company – PEPCO	Depreciation

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY, cont.

	Year	Jurisdiction	Docket No.	Client Utility	Subject
166.	2013	WY PSC	2003-ER-13	Cheyenne Light, Fuel and Power Company	Depreciation
167.	2013	FERC	ER13-2428-0000	Kentucky Utilities	Depreciation
168.	2013	FERC	ER13- -0000	MidAmerican Energy Company	Depreciation
169.	2013	FERC	ER13-2410-0000	PPL Utilities	Depreciation
170.	2013	PA PUC	R-2013-2372129	Duquesne Light Company	Depreciation
171.	2013	NJ BPU	ER12111052	Jersey Central Power and Light Company	Depreciation
172.	2013	PA PUC	R-2013-2390244	Bethlehem, City of – Bureau of Water	Depreciation
173.	2013	OK CC	UM 1679	Oklahoma, Public Service Company of	Depreciation
174.	2013	IL CC	13-0500	Nicor Gas Company	Depreciation
175.	2013	WY PSC	20000-427-EA-13	PacifiCorp	Depreciation
176.	2013	UT PSC	13-035-02	PacifiCorp	Depreciation
177.	2013	OR PUC	UM 1647	PacifiCorp	Depreciation
178.	2013	PA PUC	2013-2350509	Dubois, City of	Depreciation
179.	2014	IL CC	14-0224	North Shore Gas Company	Depreciation
180.	2014	FERC	ER14- -0000	Duquesne Light Company	Depreciation
181.	2014	SD PUC	EL14-026	Black Hills Power Company	Depreciation
182.	2014	WY PSC	20002-91-ER-14	Black Hills Power Company	Depreciation
183.	2014	PA PUC	2014-2428304	Borough of Hanover – Municipal Water Works	Depreciation
184.	2014	PA PUC	2014-2406274	Columbia Gas of Pennsylvania	Depreciation
185.	2014	IL CC	14-0225	Peoples Gas Light and Coke Company	Depreciation
186.	2014	MO PSC	ER-2014-0258	Ameren Missouri	Depreciation
187.	2014	KS CC	14-BHCG-502-RTS	Black Hills Service Company	Depreciation
188.	2014	KS CC	14-BHCG-502-RTS	Black Hills Utility Holdings	Depreciation
189.	2014	KS CC	14-BHCG-502-RTS	Black Hills Kansas Gas	Depreciation
190.	2014	PA PUC	2014-2418872	Lancaster, City of – Bureau of Water	Depreciation
191.	2014	WV PSC	14-0701-E-D	First Energy – MonPower/PotomacEdison	Depreciation
192	2014	VA St CC	PUC-2014-00045	Aqua Virginia	Depreciation
193.	2014	VA St CC	PUE-2013	Virginia American Water Company	Depreciation
194.	2014	OK CC	PUD201400229	Oklahoma Gas and Electric Company	Depreciation
195.	2014	OR PUC	UM1679	Portland General Electric	Depreciation
196.	2014	IN URC	Cause No. 44576	Indianapolis Power & Light	Depreciation
197.	2014	MA DPU	DPU. 14-150	NSTAR Gas	Depreciation
198.	2014	CT PURA	14-05-06	Connecticut Light and Power	Depreciation
199.	2014	MO PSC	ER-2014-0370	Kansas City Power & Light	Depreciation

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY, cont.

	Year	Jurisdiction	Docket No.	Client Utility	Subject
200.	2014	KY PSC	2014-00371	Kentucky Utilities Company	Depreciation
201.	2014	KY PSC	2014-00372	Louisville Gas and Electric Company	Depreciation
202.	2015	PA PUC	R-2015-2462723	United Water Pennsylvania Inc.	Depreciation
203.	2015	PA PUC	R-2015-2468056	NiSource - Columbia Gas of Pennsylvania	Depreciation
204.	2015	NY PSC	15-E-0283/15-G-0284	New York State Electric and Gas Corporation	Depreciation
205.	2015	NY PSC	15-E-0285/15-G-0286	Rochester Gas and Electric Corporation	Depreciation
206.	2015	MO PSC	WR-2015-0301/SR-2015-0302	Missouri American Water Company	Depreciation
207.	2015	OK CC	PUD 201500208	Oklahoma, Public Service Company of	Depreciation
208.	2015	WV PSC	15-0676-W-42T	West Virginia American Water Company	Depreciation
209.	2015	PA PUC	2015-2469275	PPL Electric Utilities	Depreciation
210.	2015	IN URC	Cause No. 44688	Northern Indiana Public Service Company	Depreciation
211.	2015	OH PSC	14-1929-EL-RDR	First Energy-Ohio Edison/Cleveland Electric/ Toledo Edison	Depreciation
212.	2015	NM PRC	15-00127-UT	El Paso Electric	Depreciation
213.	2015	TX PUC	PUC-44941; SOAH 473-15-5257	El Paso Electric	Depreciation
214.	2015	WI PSC	3270-DU-104	Madison Gas and Electric Company	Depreciation
215.	2015	OK CC	PUD 201500273	Oklahoma Gas and Electric	Depreciation
216.	2015	KY PSC	Doc. No. 2015-00418	Kentucky American Water Company	Depreciation
217.	2015	NC UC	Doc. No. G-5, Sub 565	Public Service Company of North Carolina	Depreciation
218.	2016	WA UTC	Docket UE-17	Puget Sound Energy	Depreciation
219.	2016	NY PSC	Case No. 16-W-0130	SUEZ Water New York, Inc.	Depreciation
220.	2016	MO PSC	ER-2016-0156	KCPL – Greater Missouri	Depreciation
221.	2016	WI PSC		Wisconsin Public Service Corporation	Depreciation
222.	2016	KY PSC	Case No. 2016-00026	Kentucky Utilities Company	Depreciation
223.	2016	KY PSC	Case No. 2016-00027	Louisville Gas and Electric Company	Depreciation
224.	2016	OH PUC	Case No. 16-0907-WW-AIR	Aqua Ohio	Depreciation
225.	2016	MD PSC	Case 9417	NiSource - Columbia Gas of Maryland	Depreciation
226.	2016	KY PSC	2016-00162	Columbia Gas of Kentucky	Depreciation
227.	2016	DE PSC	16-0649	Delmarva Power and Light Company – Electric	Depreciation
228.	2016	DE PSC	16-0650	Delmarva Power and Light Company – Gas	Depreciation
229.	2016	NY PSC	Case 16-G-0257	National Fuel Gas Distribution Corp – NY Div	Depreciation
230.	2016	PA PUC	R-2016-2537349	Metropolitan Edison Company	Depreciation
231.	2016	PA PUC	R-2016-2537352	Pennsylvania Electric Company	Depreciation
232.	2016	PA PUC	R-2016-2537355	Pennsylvania Power Company	Depreciation

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY, cont.

	Year	Jurisdiction	Docket No.	Client Utility	Subject
233.	2016	PA PUC	R-2016-2537359	West Penn Power Company	Depreciation
234.	2016	PA PUC	R-2016-2529660	NiSource - Columbia Gas of PA	Depreciation
235.	2016	KY PSC	Case No. 2016-00063	Kentucky Utilities / Louisville Gas & Electric Co	Depreciation
236.	2016	MO PSC	ER-2016-0285	KCPL Missouri	Depreciation
237.	2016	AR PSC	16-052-U	Oklahoma Gas & Electric Co	Depreciation
238.	2016	PSCW	6680-DU-104	Wisconsin Power and Light	Depreciation
239.	2016	ID PUC	IPC-E-16-23	Idaho Power Company	Depreciation
240.	2016	OR PUC	UM1801	Idaho Power Company	Depreciation
241.	2016	ILL CC	16-	MidAmerican Energy Company	Depreciation
242.	2016	KY PSC	Case No. 2016-00370	Kentucky Utilities Company	Depreciation
243.	2016	KY PSC	Case No. 2016-00371	Louisville Gas and Electric Company	Depreciation
244.	2016	IN URC	Cause No. 45029	Indianapolis Power & Light	Depreciation
245.	2016	AL RC	U-16-081	Chugach Electric Association	Depreciation
246.	2017	MA DPU	D.P.U. 17-05	NSTAR Electric Company and Western Massachusetts Electric Company	Depreciation
247.	2017	TX PUC	PUC-26831, SOAH 973-17-2686	El Paso Electric Company	Depreciation
248.	2017	WA UTC	UE-17033 and UG-170034	Puget Sound Energy	Depreciation
249.	2017	OH PUC	Case No. 17-0032-EL-AIR	Duke Energy Ohio	Depreciation
250.	2017	VA SCC	Case No. PUE-2016-00413	Virginia Natural Gas, Inc.	Depreciation
251.	2017	OK CC	Case No. PUD201700151	Public Service Company of Oklahoma	Depreciation
252.	2017	MD PSC	Case No. 9447	Columbia Gas of Maryland	Depreciation
253.	2017	NC UC	Docket No. E-2, Sub 1142	Duke Energy Progress	Depreciation
254.	2017	VA SCC	Case No. PUR-2017-00090	Dominion Virginia Electric and Power Company	Depreciation
255.	2017	FERC	ER17-1162	MidAmerican Energy Company	Depreciation
256.	2017	PA PUC	R-2017-2595853	Pennsylvania American Water Company	Depreciation
257.	2017	OR PUC	UM1809	Portland General Electric	Depreciation
258.	2017	FERC	ER17-217-000	Jersey Central Power & Light	Depreciation
259.	2017	FERC	ER17-211-000	Mid-Atlantic Interstate Transmission, LLC	Depreciation
260.	2017	MN PUC	Docket No. G007/D-17-442	Minnesota Energy Resources Corporation	Depreciation
261.	2017	IL CC	Docket No. 17-0124	Northern Illinois Gas Company	Depreciation
262.	2017	OR PUC	UM1808	Northwest Natural Gas Company	Depreciation
263.	2017	NY PSC	Case No. 17-W-0528	SUEZ Water Owego-Nichols	Depreciation
264.	2017	MO PSC	GR-2017-0215	Laclede Gas Company	Depreciation
265.	2017	MO PSC	GR-2017-0216	Missouri Gas Energy	Depreciation

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY, cont.

	Year	Jurisdiction	Docket No.	Client Utility	Subject
266.	2017	ILL CC	Docket No. 17-0337	Illinois-American Water Company	Depreciation
267.	2017	FERC	Docket No. ER18-22-000	PPL Electric Utilities Corporation	Depreciation
268.	2017	IN URC	Cause No. 44988	Northern Indiana Public Service Company	Depreciation
269.	2017	NJ BPU	BPU Docket No. WR17090985	New Jersey American Water Company, Inc.	Depreciation
270.	2017	RI PUC	Docket No. 4800	SUEZ Water Rhode Island	Depreciation
271.	2017	OK CC	Cause No. PUD 201700496	Oklahoma Gas and Electric Company	Depreciation
272.	2017	NJ BPU	ER18010029 & GR18010030	Public Service Electric and Gas Company	Depreciation
273.	2017	NC Util Com.	Docket No. E-7, SUB 1146	Duke Energy Carolinas, LLC	Depreciation
274.	2017	KY PSC	Case No. 2017-00321	Duke Energy Kentucky, Inc.	Depreciation
275.	2017	MA DPU	D.P.U. 18-40	Berkshire Gas Company	Depreciation
276.	2018	IN IURC	Cause No. 44992	Indiana-American Water Company, Inc.	Depreciation
277.	2018	IN IURC	Cause No. 45029	Indianapolis Power and Light	Depreciation
278.	2018	NC Util Com.	Docket No. W-218, Sub 497	Aqua North Carolina, Inc.	Depreciation
279.	2018	PA PUC	Docket No. R-2018-2647577	NiSource - Columbia Gas of Pennsylvania, Inc.	Depreciation
280.	2018	OR PUC	Docket UM 1933	Avista Corporation	Depreciation
281.	2018	WA UTC	Docket No. UE-108167	Avista Corporation	Depreciation
282.	2018	ID PUC	AVU-E-18-03, AVU-G-18-02	Avista Corporation	Depreciation
283.	2018	IN URC	Cause No. 45039	Citizens Energy Group	Depreciation
284.	2018	FERC	Docket No. ER18-	Duke Energy Progress	Depreciation
285.	2018	PA PUC	Docket No. R-2018-3000124	Duquesne Light Company	Depreciation
286.	2018	MD PSC	Case No. 948	NiSource - Columbia Gas of Maryland	Depreciation
287.	2018	MA DPU	D.P.U. 18-45	NiSource - Columbia Gas of Massachusetts	Depreciation
288.	2018	OH PUC	Case No. 18-0299-GA-ALT	Vectren Energy Delivery of Ohio	Depreciation
289.	2018	PA PUC	Docket No. R-2018-3000834	SUEZ Water Pennsylvania Inc.	Depreciation
290.	2018	MD PSC	Case No. 9847	Maryland-American Water Company	Depreciation
291.	2018	PA PUC	Docket No. R-2018-3000019	The York Water Company	Depreciation
292.	2018	FERC	ER-18-2231-000	Duke Energy Carolinas, LLC	Depreciation
293.	2018	KY PSC	Case No. 2018-00261	Duke Energy Kentucky, Inc.	Depreciation
294.	2018	NJ BPU	BPU Docket No. WR18050593	SUEZ Water New Jersey	Depreciation
295.	2018	WA UTC	Docket No. UE-180778	PacifiCorp	Depreciation
296.	2018	UT PSC	Docket No. 18-035-36	PacifiCorp	Depreciation
297.	2018	OR PUC	Docket No. UM-1968	PacifiCorp	Depreciation
298.	2018	ID PUC	Case No. PAC-E-18-08	PacifiCorp	Depreciation
299.	2018	WY PSC	20000-539-EA-18	PacifiCorp	Depreciation
300.	2018	PA PUC	Docket No. R-2018-3003068	Aqua Pennsylvania, Inc.	Depreciation

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY, cont.

	Year	Jurisdiction	Docket No.	Client Utility	Subject
301.	2018	IL CC	Docket No. 18-1467	Aqua Illinois, Inc.	Depreciation
302.	2018	KY PSC	Case No. 2018-00294	Louisville Gas & Electric Company	Depreciation
303.	2018	KY PSC	Case No. 2018-00295	Kentucky Utilities Company	Depreciation
304.	2018	IN URC	Cause No. 45159	Northern Indiana Public Service Company	Depreciation
305.	2018	VA SCC	Case No. PUR-2019-00175	Virginia American Water Company	Depreciation
306.	2019	PA PUC	Docket No. R-2018-3006818	Peoples Natural Gas Company, LLC	Depreciation
307.	2019	OK CC	Cause No. PUD201800140	Oklahoma Gas and Electric Company	Depreciation
308.	2019	MD PSC	Case No. 9490	FirstEnergy – Potomac Edison	Depreciation
309.	2019	SC PSC	Docket No. 2018-318-E	Duke Energy Progress	Depreciation
310.	2019	SC PSC	Docket No. 2018-319-E	Duke Energy Carolinas	Depreciation
311.	2019	DE PSC	DE 19-057	Public Service of New Hampshire	Depreciation
312.	2019	NY PSC	Case No. 19-W-0168 & 19-W-0269	SUEZ Water New York	Depreciation
313.	2019	PA PUC	Docket No. R-2019-3006904	Newtown Artesian Water Company	Depreciation
314.	2019	MO PSC	ER-2019-0335	Ameren Missouri	Depreciation
315.	2019	MO PSC	EC-2019-0200	KCP&L Greater Missouri Operations Company	Depreciation
316.	2019	MN DOC	G011/D-19-377	Minnesota Energy Resource Corp.	Depreciation
317.	2019	NY PSC	Case 19-E-0378 & 19-G-0379	New York State Electric and Gas Corporation	Depreciation
318.	2019	NY PSC	Case 19-E-0380 & 19-G-0381	Rochester Gas and Electric Corporation	Depreciation
319.	2019	WA UTC	Docket UE-190529 / UG-190530	Puget Sound Energy	Depreciation
320.	2019	PA PUC	Docket No. R-2019-3010955	City of Lancaster	Depreciation
321.	2019	IURC	Cause No. 45253	Duke Energy Indiana	Depreciation
322.	2019	KY PSC	Case No. 2019-00271	Duke Energy Kentucky, Inc.	Depreciation
323.	2019	OH PUC	Case No. 18-1720-GA-AIR	Northeast Ohio Natural Gas Corp	Depreciation
324.	2019	NC Util.	Docket No. E-2, Sub 1219	Duke Energy Carolinas	Depreciation
325.	2019	FERC	Docket No. ER20-277-000	Jersey Central Power & Light Company	Depreciation
326.	2019	MA DPU	D.P.U. 19-120	NSTAR Gas Company	Depreciation
327.	2019	SC PSC	Docket No. 2019-290-WS	Blue Granite Water Company	Depreciation
328.	2019	NC Util.	Docket No. E-2, Sub 1219	Duke Energy Progress	Depreciation
329.	2019	MD PSC	Case No. 9609	NiSource Columbia Gas of Maryland, Inc.	Depreciation
330.	2019	HI PUC	Docket No. 2019-0117	Young Brothers, LLC	Depreciation
331.	2020	NJ BPU	Docket No. ER20020146	Jersey Central Power & Light Company	Depreciation
332.	2020	PA PUC	Docket No. R-2020-3018835	NiSource - Columbia Gas of Pennsylvania, Inc.	Depreciation
333.	2020	PA PUC	Docket No. R-2020-3019369	Pennsylvania-American Water Company	Depreciation
334.	2020	PA PUC	Docket No. R-2020-3019371	Pennsylvania-American Water Company	Depreciation
335.	2020	MO PSC	GO-2018-0309, GO-2018-0310	Spire Missouri, Inc.	Depreciation
336.	2020	NM PRC	Case No. 20-00104-UT	El Paso Electric Company	Depreciation
337.	2020	MD PSC	Case No. 9644	Columbia Gas of Maryland, Inc.	Depreciation
338.	2020	MO PSC	GO-2018-0309, GO-2018-0310	Spire Missouri, Inc.	Depreciation

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY, cont.

	Year	Jurisdiction	Docket No.	Client Utility	Subject
339.	2020	VA St CC	Case No. PUR-2020-00095	Virginia Natural Gas Company	Depreciation
340.	2020	SC PSC	Docket No. 2020-125-E	Dominion Energy South Carolina, Inc.	Depreciation
341.	2020	WV PSC	Case No. 20-0745-G-D	Hope Gas, Inc. d/b/a Dominion Energy West Virginia	Depreciation
342.	2020	VA St CC	Case No. PUR-2020-00106	Aqua Virginia, Inc.	Depreciation
343.	2020	PA PUC	Docket No. R-2020-3020256	City of Bethlehem – Bureau of Water	Depreciation
344.	2020	NE PSC	Docket No. NG-109	Black Hills Nebraska	Depreciation
345.	2020	NY PSC	Case No. 20-E-0428 & 20-G-0429	Central Hudson Gas & Electric Corporation	Depreciation
346.	2020	FERC	ER20-598	Duke Energy Indiana	Depreciation
347.	2020	FERC	ER20-855	Northern Indiana Public Service Company	Depreciation
348.	2020	OR PSC	UE 374	PacifiCorp	Depreciation
349.	2020	MD PSC	Case No. 9490 Phase II	Potomac Edison – Maryland	Depreciation
350.	2020	IN URC	Case No. 45447	Southern Indiana Gas and Electric Company	Depreciation
351.	2020	IN URC	IURC Cause No. 45468	Indiana Gas Company, Inc. d/b/a Vectren Energy Delivery	Depreciation
352.	2020	KY PSC	Case No. 2020-00349	Kentucky Utilities Company	Depreciation
353.	2020	KY PSC	Case No. 2020-00350	Louisville Gas and Electric Company	Depreciation
354.	2020	FERC	Docket No. ER21- 000	South FirstEnergy Operating Companies	Depreciation
355.	2020	OH PUC	Case Nos 20-1651-EL-AIR, 20-1652-EL-AAM & 20-1653-EL-ATA	Dayton Power and Light Company	Depreciation
356.	2020	OR PSC	UG 388	Northwest Natural Gas Company	Depreciation
357.	2020	MO PSC	Case No. GR-2021-0241	Ameren Missouri Gas	Depreciation
358.	2021	KY PSC	Case No. 2021-00103	East Kentucky Power Cooperative	Depreciation
359.	2021	MPUC	Docket No. 2021-00024	Bangor Natural Gas	Depreciation
360.	2021	PA PUC	Docket No. R-2021-3024296	Columbia Gas of Pennsylvania, Inc.	Depreciation
361.	2021	NC Util.	Doc. No. G-5, Sub 632	Public Service of North Carolina	Depreciation
362.	2021	MO PSC	ER-2021-0240	Ameren Missouri	Depreciation
363.	2021	PA PUC	Docket No. R-2021-3024750	Duquesne Light Company	Depreciation
364.	2021	KS PSC	21-BHCG-418-RTS	Black Hills Kansas Gas	Depreciation
365.	2021	KY PSC	Case No. 2021-00190	Duke Energy Kentucky	Depreciation
366.	2021	OR PSC	Docket UM 2152	Portland General Electric	Depreciation
367.	2021	ILL CC	Docket No. 20-0810	North Shore Gas Company	Depreciation
368.	2021	FERC	ER21-1939-000	Duke Energy Progress	Depreciation
369.	2021	FERC	ER21-1940-000	Duke Energy Carolina	Depreciation
370.	2021	KY PSC	Case No. 2021-00183	NiSource Columbia Gas of Kentucky	Depreciation
371.	2021	MD PSC	Case No. 9664	NiSource Columbia Gas of Maryland	Depreciation
372.	2021	OH PUC	Case No. 21-0596-ST-AIR	Aqua Ohio	Depreciation
373.	2021	PA PUC	Docket No. R-2021-3026116	Hanover Borough Municipal Water Works	Depreciation
374.	2021	OR PSC	UM-2180	Idaho Power Company	Depreciation
375.	2021	ID PUC	Case No. IPC-E-21-18	Idaho Power Company	Depreciation

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY, cont.

	Year	Jurisdiction	Docket No.	Client Utility	Subject
376.	2021	WPSC	6690-DU-104	Wisconsin Public Service Company	Depreciation
377.	2021	PAPUC	Docket No. R-2021-3026116	Borough of Hanover	Depreciation
378.	2021	OH PUC	Case No. 21-637-GA-AIR; Case No. 21-638-GA-ALT; Case No. 21-639-GA-UNC; Case No. 21-640-GA-AAM	NiSource Columbia Gas of Ohio	Depreciation
379.	2021	TX PUC	Texas PUC Docket No. 52195; SOHA Docket No. 473-21-2606	El Paso Electric	Depreciation
380.	2021	MO PSC	Case No. GR.2021-0108	Spire Missouri	Depreciation
381.	2021	WV PSC	Case No. 21-0215-WS-P	West Virginia American Water Company	Depreciation
382.	2021	FERC	ER21-2736	Duke Energy Carolinas	Depreciation
383.	2021	FERC	ER21-2737	Duke Energy Progress	Depreciation
384.	2021	IN URC	Cause #45621	Northern Indiana Public Service Company	Depreciation
385.	2021	PA PUC	Docket No. R-2021-3026682	City of Lancaster	Depreciation
386.	2021	OH PUC	Case No. 21-887-EL-AIR; Case No. 21-888-EL-ATA; Case No. 889-El-AAM	Duke Energy Ohio	Depreciation
387.	2021	AK PSC	Docket No. 21-097-U	Black Hills Energy Arkansas, Inc.	Depreciation
388.	2021	OK CC	Cause No. PUD202100164	Oklahoma Gas & Electric	Depreciation
389.	2021	FERC	Case ER-22-392-001	El Paso Electric	Depreciation
390.	2021	FERC	Case ER-21-XXX	MidAmerican Electric	Depreciation
391.	2021	PA PUC	Docket Nos. R-2021-3027385, R-2021-3027386	Aqua Pennsylvania, Inc. Aqua Pennsylvania Wastewater, Inc.	Depreciation
392.	2022	FERC	Case ER-22-282-000	El Paso Electric	Depreciation
393.	2022	ILL CC	Docket No. 22-0154	MidAmerican Gas	Depreciation
394.	2022	MO PSC	Case No. ER-2022-0129	Evergy Metro	Depreciation
395.	2022	MO PSC	Case No. ER-2022-0130	Evergy Missouri West	Depreciation
396.	2022	PA PUC	Docket No. R-2022-3031211	NiSource Columbia Gas of Pennsylvania, Inc.	Depreciation
397.	2022	MA DPU	D.P.U. 22-20	The Berkshire Gas Company	Depreciation
398.	2022	PA PUC	R-2022-3031672; R-2022-3031673	Pennsylvania-American Water Company	Depreciation
399.	2022	SD PUC	Docket No. NG22-	MidAmerican Gas	Depreciation
400.	2022	MD PSC	Case No. 9680	NiSource Columbia Gas of Maryland	Depreciation
401.	2022	WYPSC	Docket No. 20003-214-ER-22	Black Hills Energy – Cheyenne Light, Fuel and Power	Depreciation
402.	2022	MA DPU	D.P.U. 22.22	NSTAR Electric Company d/b/a Eversource Energy	Depreciation
403.	2022	NC Util Com	Docket No. W-218, Sub 573	Aqua North Carolina, Inc.	Depreciation
404.	2022	OR PUC	UM2213	Northwest Natural Gas	Depreciation

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY, cont.

	Year	Jurisdiction	Docket No.	Client Utility	Subject
405.	2022	OR PUC	UM2214	Northwest Natural Gas	Depreciation
406.	2022	ME PUC	Docket No. 2022-00152	Central Maine Power	Depreciation
407.	2022	SC PSC	Docket No. 2022-254-E	Duke Energy Progress	Depreciation
408.	2022	NC Util Com	Docket No. E-2, SUB 1300	Duke Energy Progress	Depreciation
409.	2022	IN URC	Cause #45772	Northern Indiana Public Service Company	Depreciation
410.	2022	PA PUC	R-2022-3031340	The York Water Company	Depreciation
411.	2022	PA PUC	R-2022-3032806	The York Water Company	Depreciation
412.	2022	PA PUC	R-2022-3031704	Borough of Ambler	Depreciation
413.	2022	MO PSC	ER-2022-0337	Ameren Missouri	Depreciation
414.	2022	OH PUC	Case No. 22-507-GA-AIR	Duke Energy Ohio	Depreciation
415.	2022	PA PUC	R-2022-3035730	National Fuel Gas Distribution Corporation – PA Division	Depreciation
416.	2022	NC Util Com	Docket No. E-22, Sub 493	Virginia Electric and Power Company	Depreciation
417.	2022	WY PSC	20003-214-ER-22	Cheyenne Light, Fuel and Power Company	Depreciation
418.	2022	NJ BPU	BPU Docket No. ER2303144	Jersey Central Power & Light Company	Depreciation
419.	2022	KY PSC	Case No. 2022-00372	Duke Energy Kentucky	Depreciation
420.	2022	TX PUC	SOAH Docket No. 473-23-04521	Aqua Texas, Inc.	Depreciation
421.	2022	NC Util Com	Docket No. E-7, Sub 1276	Duke Energy Carolinas, LLC	Depreciation
422.	2022	KY PSC	Case No. 2022-00432	Bluegrass Water	Depreciation
423.	2023	ILL CC	Docket No. 23-0069	The Peoples Gas Light and Coke Company	Depreciation
424.	2023	ILL CC	Docket No. 23-0068	North Shore Gas Company	Depreciation
425.	2023	WV PSC	Case No. 23-0030-E-D	Monongahela Power Company and The Potomac Edison	Depreciation
426.	2023	ID PUC	AVU-E-23-01; AVU-G-23-01	Avista Corporation	Depreciation
427.	2023	ILL CC	Docket No. 23-0066	Northern Illinois Gas Company d/b/a Nicor Gas Company	Depreciation
428.	2023	SC PSC	Docket No. 2023-70-G	Dominion Energy South Carolina, Inc.	Depreciation
429.	2023	FERC	Docket No. ER23-xxx-00	Duke Energy Ohio, Inc.	Depreciation
430.	2023	WY PSC	Docket No. 30036-78-GR-23	Black Hills Wyoming Gas Company d/b/a Black Hills Energy	Depreciation
431.	2023	MD PSC	Case No. 9695	The Potomac Edison Company	Depreciation
432.	2023	OR PUC	Case No. UM2277	Avista Corporation	Depreciation
433.	2023	FERC	Docket No. ER23-1629-000	PPL Electric Utilities	Depreciation
434.	2023	OH PUC	Case No. 23-0154-GA-AIR	Northeast Ohio Natural Gas Corporation	Depreciation
435.	2023	DE PSC	PSC Docket No. 23-0601	Artesian Water Company	Depreciation
436.	2023	CO PUC	No. 23AL-0231G	Black Hills Colorado d/b/a Black Hills Energy	Depreciation
437.	2023	NH PUC	Docket No. DE 23-039	Granite State Electric d/b/a Liberty Utilities	Depreciation
438.	2023	MD PSC	Case No. 9701	Columbia Gas of Maryland	Depreciation
439.	2023	NY PSC	Case Nos. 23-E-0418; 23-G-0419	Central Hudson Gas and Electric	Depreciation
440.	2023	FERC	Docket No. ER23-xxx-000	Central Maine Power Company	Depreciation
441.	2023	SD PUC	Docket Number EL23-016	Northwestern Energy	Depreciation

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY, cont.

	Year	Jurisdiction	Docket No.	Client Utility	Subject
442.	2023	CT PURA	Docket No. 23-08-32	Connecticut Water Company	Depreciation
443.	2023	OH PUC	Case 23-0894-GA-AIR	The East Ohio Gas Company d/b/a Dominion Energy Ohio	Depreciation
444.	2023	IN URC	Cause No. 45911	Indianapolis Power & Light	Depreciation
445.	2023	IN URC	Cause No. 45967	Northern Indiana Public Service Company	Depreciation
446.	2023	PA PUC	Docket No. R-2023-3043189 and Docket No. R-2023-3043190	Pennsylvania-American Water Company	Depreciation
447.	2023	IN URC	Cause No. 45988	Citizens Energy Group	Depreciation
448.	2023	NY PSC	Case No. 23-G-0627	National Fuel Gas Distribution Corporation	Depreciation
449.	2023	IN URC	Cause No. 45990	Southern Indiana Gas and Electric Company d/b/a Centerpoint Energy Indiana South	Depreciation
450.	2023	PA PUC	Docket No. R-2023-3044549	Peoples Natural Gas Company LLC	Depreciation
451.	2023	OR PUC	Docket No. UM-2312	Northwest Natural Gas Company	Depreciation
452.	2023	AZ PCC	Docket No. WS-21182A-23-2092	Northwest Natural Water Company, LLC	Depreciation
453.	2023	SC PSC	Docket No. 2023-388-E	Duke Energy Carolinas	Depreciation
454.	2024	FERC	Docket No. ER24-768-000	Duke Energy Progress	Depreciation
455.	2024	FERC	Docket No. ER24-2057	Duke Energy Carolina	Depreciation
456.	2024	FERC	Docket No. SPP-0007	Evergy Metro, Inc. and Evergy Missouri West, Inc.	Depreciation
457.	2024	NJ BPU	Docket No. WR24010057	Aqua New Jersey, Inc.	Depreciation
458.	2024	ILL CC	Docket No. 24-0044	Aqua Illinois, Inc.	Depreciation
459.	2024	PA PUC	Docket No. R-2024-3046519	NiSource – Columbia Gas of Pennsylvania, Inc.	Depreciation
460.	2024	KY PSC	Case No. 2024-00092	NiSource – Columbia Gas of Kentucky, Inc.	Depreciation
461.	2024	VA SCC	Case No. PUR-2024-00030	NiSource – Columbia Gas of Virginia, Inc.	Depreciation
462.	2024	NE PSC	Docket No. 24-	Northwestern Energy	Depreciation
463.	2024	IA Util Bd	Docket No. RPU-2023-0002	Alliant - Interstate Power and Light Company	Depreciation
464.	2024	PA PUC	Docket No. R-2024-3047068	FirstEnergy Pennsylvania – Metropolitan Edison; Pennsylvania Electric; Pennsylvania Power; West Penn	Depreciation
465.	2024	PA PUC	Docket No. R-2024-3046523	Duquesne Light Company	Depreciation
466.	2024	NCUC	Docket No. E-22, Sub 694	Dominion Energy North Carolina	Depreciation
467.	2024	IN URC	IURC Cause No. 46038	Duke Energy Indiana	Depreciation
468.	2024	NJ BPU	Docket Nos. ER23120924 and	Public Service Electric and Gas Company	Depreciation
469.	2024	CO PUC	Docket No. 24-AL-0275E	Black Hills Colorado Electric, LLC	Depreciation
470.	2024	OH PUC	Case No. 24-0468-EL-AIR, Case No. 24-0469-EL-ATA,	FirstEnergy Ohio	Depreciation
471.	2024	SD PUC	Docket No. NG24-005	Northwestern Energy	Depreciation
472.	2024	PA PUC	Docket No. R-2024-3047822	Aqua Pennsylvania, Inc	Depreciation
473.	2024	PA PUC	Docket No. R-2024-3047824	Aqua Pennsylvania Wastewater, Inc	Depreciation
474.	2024	NH PUC	Docket No. DE 24-070	Eversource Energy - Public Service of New Hampshire	Depreciation
475.	2024	VA SCC	Case No. PUR-2024-00048	Virginia Natural Gas Company	Depreciation
476.	2024	WV PSC	Case No. 24-0678-G-D	Hope Gas, Inc.	Depreciation

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY, cont.

	Year	Jurisdiction	Docket No.	Client Utility	Subject
477.	2024	MO PSC	ER-2024-0319	Ameren Missouri	Depreciation
478.	2024	PA PUC	Docket No. R-2024-3050208	Newtown Artesian Water Company	Depreciation
479.	2024	PA PUC	Docket No. RP-24-1106-00	Adelphia Gateway	Depreciation
480.	2024	OH PUC	Case No. 24-0832-GA-AIR	Centerpoint Energy Ohio	Depreciation
481.	2024	MT PSC	Docket 2024-05-053	Northwestern Energy	Depreciation
482.	2024	MD PSC	Case No. 9754	NiSource – Columbia Gas of Maryland	Depreciation
483.	2024	OR PUC	UM 2363	Northwest Natural Gas Company	Depreciation
484.	2024	IURC	Cause No. 46120	Northern Indiana Public Service Company LLC	Depreciation
485.	2024	MO PSC	GR-2024-0369	Ameren Missouri	Depreciation
486.	2024	PUCO	Case No. 24-1009-EL-AIR, Case No. 24-1010-El-AAM, Case No. 24-1011-El-ATA	The Dayton Power and Light Company d/b/a AES Ohio	Depreciation
487.	2024	KY PSC	Case No. 2024-00354	Duke Energy Kentucky	Depreciation
488.	2024	MO PSC	GR-2025-0107	Spire Missouri, Inc.	Depreciation
489.	2024	OR PUC	UG 520	Northwest Natural Gas	Depreciation
490.	2024	TX PUC	SOAH Docket No. 473-25-11219; PUC Docket No. 57568	El Paso Electric	Depreciation
491.	2024	FERC	Docket No. RP24-1106-002	Adelphia Gateway, LLC	Depreciation
492.	2025	PA PUC	Docket No.R-2025-3053499	Columbia Gas of Pennsylvania, Inc.	Depreciation
493.	2025	NE PSC	Case No. NG-124	Black Hills Nebraska	Depreciation
494.	2025	KY PSC	Case No. 2025-00114	Louisville Gas and Electric	Depreciation
495.	2025	KY PSC	Case No. 2025-00113	Kentucky Utilities	Depreciation
496.	2025	PA PUC	Docket No. R-2025-2025-3053442, R-2025-3053573	The York Water Company	Depreciation
497.	2025	NC UC	Docket No. W-218, Sub 629	Aqua North Carolina, Inc.	Depreciation
498.	2025	TX PUC	Docket No. 58124	Aqua Texas, Inc.	Depreciation
499.	2025	FERC	Docket No. ER25-2479-000	Duke Energy Indiana, LLC	Depreciation
500.	2025	IURC	Cause No. 46258	Indianapolis Power & Light Company d/b/a AES Indiana	Depreciation
501.	2025	NY PSC	Case 25-E-0375 & Case 25-G-378	New York State Electric and Gas Corporation	Depreciation
502.	2025	ILL CC	Docket No. 25-0055	Northern Illinois Gas Company d/b/a Nicor Gas Company	Depreciation
503.	2025	NY PSC	Case 25-E-0379 & Case 25-G-0380	Rochester Gas and Electric Corporation	Depreciation
504.	2025	CA PUC	A.25-01-001	San Gabriel Water Company	Depreciation
505.	2025	FERC	Docket EL25-77-000	Valley Link	Depreciation

LIST OF CASES IN WHICH JOHN J. SPANOS SUBMITTED TESTIMONY, cont.

	Year	Jurisdiction	Docket No.	Client Utility	Subject
506.	2025	KY PSC	Docket No. 2025-00125	Duke Energy Kentucky	Depreciation
507.	2025	KY PSC	Docket No 2025-00208	East Kentucky Power Cooperative	Depreciation
508.	2025	SC PSC	Docket No. 2025-243-WS	Kiawah Island Utility	Depreciation
509.	2025	MA DPU	D.P.U. 25-170	The Berkshire Gas Company	Depreciation
510.	2025	WA UTC	Docket No. UG-250610	Northwest Natural Gas Company	Depreciation
511.	2025	SC PSC	Docket No. 2025-243-WS	Kiawah Island Utility, Inc. (South Carolina Water)	Depreciation
512.	2025	PA PUC	Docket No. R-2025-3057983, Docket No. R-2025-3058051	Pennsylvania-American Water Company	Depreciation
513.	2025	RI PUC	Docket No. 25-45-GE	Rhode Island Energy	Depreciation
514.	2025	IN URC	Cause No. 46334	Aqua Indiana, Inc.	Depreciation
515.	2025	SC PSC	Docket No. 2025-325-E	Dominion Energy South Carolina, Inc.	Depreciation
516.	2025	CA PUC	A.26-01-___	Suburban Water Systems	Depreciation
517.	2025	VA SCC	Case No. PUR-2025-_____	Aqua Virginia, Inc.	Depreciation
518.	2025	FERC	Docket No. ER26-750-000	Black Hills Power, Inc.	Depreciation
519.	2025	NC UTC	Docket No. E-7, Sub 1329	Duke Energy Carolinas, LLC	Depreciation
520.	2025	NC UTC	Docket No. E-2, Sub 1380	Duke Energy Progress, LLC	Depreciation

NATIONAL FUEL EXHIBIT JJS-1

NATIONAL FUEL GAS DISTRIBUTION - PENNSYLVANIA DIVISION
MONTHLY PLANT BRINGFORWARD FOR FFTY

		2026		
	6/30/2026	October		
Account	Ending Balance	Additions	Retirements	Ending Balance
30300	24,487,946.38	-	-	24,487,946.38
32540	55,006.53	205.38	79.39	55,132.52
32800	11,077.40	39.33	15.20	11,101.52
32900	2,904.48	10.20	3.94	2,910.73
33200	487,774.55	1,730.43	668.94	488,836.04
33400	3,588,782.71	12,580.61	4,863.33	3,596,499.99
36520	2,842,251.07	17,065.78	1,552.28	2,857,764.57
36620	251,285.57	1,561.57	142.04	252,705.11
36630	5,081.76	55.77	5.07	5,132.46
36710	72,491,899.16	436,281.58	39,683.50	72,888,497.24
36720	4,889,292.14	48,475.73	4,409.28	4,933,358.59
36900	8,763,147.86	54,153.17	4,925.69	8,812,375.34
37420	16,023,145.64	36,724.56	5,762.21	16,054,108.00
37500	13,035,098.70	30,166.60	4,733.24	13,060,532.06
37610	400,109,007.61	913,152.94	143,276.72	400,878,883.82
37620	2,741,104.22	9,223.77	1,447.24	2,748,880.75
37800	11,068,313.02	25,576.03	4,012.96	11,089,876.09
38000	230,084,470.78	534,309.58	83,834.94	230,534,945.41
38100	17,736,870.40	35,576.92	5,582.14	17,766,865.18
38200	3,530,905.96	8,197.45	1,286.21	3,537,817.20
38400	1,229,482.65	2,787.13	437.31	1,231,832.47
38500	18,802,489.79	41,479.08	6,508.21	18,837,460.67
39011	1,428,040.58	798.79	664.05	1,428,175.32
39110	328,739.97	1,949.05	-	330,689.02
39120	244,973.84	1,597.58	-	246,571.42
39130	7,740,747.62	49,972.26	-	7,790,719.88
39200	15,360,082.17	98,474.75	82,344.07	15,376,212.85
39400	10,297,183.94	61,890.20	-	10,359,074.14
39600	11,426,348.22	73,233.01	61,260.37	11,438,320.86
39700	4,335,043.11	31,216.69	-	4,366,259.80
30100	116,457.07	-	-	116,457.07
30200	7,388.47	-	-	7,388.47
32550	2,840.80	-	-	2,840.80
36510	20,192.52	111.54	10.15	20,293.92
37410	1,016,687.37	2,295.29	360.14	1,018,622.52
38910	59,856.94	383.42	318.25	59,922.11
TOTAL	**884,621,921.01**	**2,531,276.19**	**458,186.86**	**886,695,010.34**

NATIONAL FUEL GAS DISTRIBUTION - PENNSYLVANIA DIVISION
MONTHLY PLANT BRINGFORWARD FOR FFTY

2026			2026		
November			December		
Additions	Retirements	Ending Balance	Additions	Retirements	Ending Balance
-	-	24,487,946.38	-	-	24,487,946.38
400.99	138.78	55,394.72	305.94	49.06	55,651.60
76.78	26.57	11,151.73	58.58	9.39	11,200.92
19.91	6.89	2,923.75	15.19	2.44	2,936.50
3,378.54	1,169.30	491,045.28	2,577.69	413.38	493,209.59
24,562.64	8,501.05	3,612,561.59	18,740.33	3,005.35	3,628,296.57
33,319.57	2,713.36	2,888,370.78	25,421.53	959.25	2,912,833.06
3,048.85	248.28	255,505.67	2,326.15	87.77	257,744.05
108.89	8.87	5,232.48	83.08	3.13	5,312.42
851,805.12	69,366.33	73,670,936.03	649,893.89	24,522.91	74,296,307.00
94,645.01	7,707.37	5,020,296.24	72,210.43	2,724.77	5,089,781.90
105,729.76	8,610.05	8,909,495.05	80,667.66	3,043.89	8,987,118.82
71,701.79	10,072.27	16,115,737.51	54,705.65	3,560.83	16,166,882.34
58,897.90	8,273.65	13,111,156.31	44,936.78	2,924.96	13,153,168.13
1,782,858.56	250,446.18	402,411,296.21	1,360,251.13	88,539.64	403,683,007.70
18,008.67	2,529.76	2,764,359.66	13,739.91	894.34	2,777,205.23
49,935.17	7,014.62	11,132,796.64	38,098.58	2,479.86	11,168,415.36
1,043,197.00	146,542.58	231,431,599.83	795,918.38	51,806.85	232,175,711.36
69,461.11	9,757.51	17,826,568.77	52,996.10	3,449.55	17,876,115.32
16,004.86	2,248.28	3,551,573.79	12,211.08	794.83	3,562,990.04
5,441.65	764.41	1,236,509.71	4,151.77	270.24	1,240,391.24
80,984.61	11,376.27	18,907,069.00	61,788.08	4,021.83	18,964,835.25
1,559.57	1,160.75	1,428,574.15	1,189.89	410.36	1,429,353.68
3,805.36	-	334,494.37	2,903.34	-	337,397.71
3,119.15	-	249,690.56	2,379.79	-	252,070.35
97,566.87	-	7,888,286.76	74,439.70	-	7,962,726.45
192,264.13	143,936.56	15,424,540.43	146,689.99	50,885.55	15,520,344.87
120,835.70	-	10,479,909.84	92,192.90	-	10,572,102.74
142,981.63	107,082.46	11,474,220.04	109,089.38	37,856.61	11,545,452.81
60,948.10	-	4,427,207.90	46,501.01	-	4,473,708.92
-	-	116,457.07	-	-	116,457.07
-	-	7,388.47	-	-	7,388.47
-	-	2,840.80	-	-	2,840.80
217.77	17.73	20,493.96	166.15	6.27	20,653.84
4,481.36	629.52	1,022,474.37	3,419.10	222.55	1,025,670.92
748.59	556.30	60,114.41	571.15	196.67	60,488.89
4,942,115.64	**800,905.72**	**890,836,220.27**	**3,770,640.32**	**283,142.28**	**894,323,718.31**

NATIONAL FUEL GAS DISTRIBUTION - PENNSYLVANIA DIVISION
MONTHLY PLANT BRINGFORWARD FOR FFTY

2027			2027		
January			Feburary		
Additions	**Retirements**	**Ending Balance**	**Additions**	**Retirements**	**Ending Balance**
-	-	24,487,946.38	-	-	24,487,946.38
343.90	81.63	55,913.87	259.60	75.24	56,098.22
65.85	15.63	11,251.15	49.71	14.41	11,286.45
17.07	4.05	2,949.53	12.89	3.74	2,958.68
2,897.53	687.77	495,419.35	2,187.24	633.97	496,972.62
21,065.61	5,000.23	3,644,361.94	15,901.65	4,609.08	3,655,654.51
28,575.79	1,595.97	2,939,812.88	21,570.82	1,471.13	2,959,912.58
2,614.78	146.04	260,212.79	1,973.80	134.61	262,051.98
93.38	5.22	5,400.59	70.49	4.81	5,466.27
730,531.76	40,800.60	74,986,038.16	551,451.69	37,608.89	75,499,880.96
81,170.20	4,533.40	5,166,418.70	61,272.41	4,178.77	5,223,512.34
90,676.78	5,064.35	9,072,731.25	68,448.59	4,668.18	9,136,511.66
61,493.45	5,924.41	16,222,451.37	46,419.15	5,460.96	16,263,409.56
50,512.47	4,866.48	13,198,814.12	38,130.02	4,485.79	13,232,458.35
1,529,029.07	147,309.98	405,064,726.79	1,154,208.10	135,786.39	406,083,148.51
15,444.74	1,487.98	2,791,161.99	11,658.67	1,371.58	2,801,449.08
42,825.79	4,125.93	11,207,115.22	32,327.62	3,803.17	11,235,639.68
894,674.75	86,194.91	232,984,191.20	675,357.24	79,452.15	233,580,096.28
59,571.78	5,739.27	17,929,947.83	44,968.55	5,290.31	17,969,626.07
13,726.22	1,322.41	3,575,393.85	10,361.42	1,218.97	3,584,536.30
4,666.91	449.62	1,244,608.53	3,522.88	414.45	1,247,716.97
69,454.65	6,691.41	19,027,598.49	52,428.78	6,167.96	19,073,859.31
1,337.53	682.74	1,430,008.48	1,009.65	629.33	1,430,388.80
3,263.58	-	340,661.29	2,463.56	-	343,124.85
2,675.07	-	254,745.42	2,019.31	-	256,764.73
83,676.06	-	8,046,402.52	63,164.00	-	8,109,566.51
164,891.07	84,662.07	15,600,573.87	124,470.23	78,039.22	15,647,004.88
103,632.06	-	10,675,734.79	78,228.05	-	10,753,962.84
122,625.02	62,984.85	11,605,092.98	92,565.14	58,057.75	11,639,600.37
52,270.79	-	4,525,979.70	39,457.31	-	4,565,437.01
-	-	116,457.07	-	-	116,457.07
-	-	7,388.47	-	-	7,388.47
-	-	2,840.80	-	-	2,840.80
186.77	10.43	20,830.18	140.99	9.62	20,961.55
3,843.34	370.28	1,029,143.98	2,901.20	341.31	1,031,703.87
642.02	327.21	60,803.70	484.63	301.61	60,986.72
4,238,495.78	**471,084.88**	**898,091,129.21**	**3,199,485.39**	**434,233.39**	**900,856,381.21**

NATIONAL FUEL GAS DISTRIBUTION - PENNSYLVANIA DIVISION
MONTHLY PLANT BRINGFORWARD FOR FFTY

2027			2027		
March			April		
Additions	Retirements	Ending Balance	Additions	Retirements	Ending Balance
-	-	24,487,946.38	-	-	24,487,946.38
305.28	85.89	56,317.61	363.25	142.40	56,538.46
58.46	16.45	11,328.46	69.56	27.27	11,370.75
15.16	4.26	2,969.57	18.03	7.07	2,980.53
2,572.15	723.64	498,821.13	3,060.56	1,199.79	500,681.90
18,700.04	5,261.00	3,669,093.55	22,250.88	8,722.70	3,682,621.73
25,366.87	1,679.21	2,983,600.24	30,183.63	2,784.11	3,010,999.77
2,321.15	153.65	264,219.48	2,761.90	254.76	266,726.63
82.90	5.49	5,543.69	98.64	9.10	5,633.23
648,496.64	42,928.40	76,105,449.21	771,635.71	71,174.96	76,805,909.95
72,055.18	4,769.82	5,290,797.70	85,737.30	7,908.33	5,368,626.67
80,494.23	5,328.46	9,211,677.43	95,778.78	8,834.55	9,298,621.66
54,588.04	6,233.38	16,311,764.22	64,953.42	10,334.89	16,366,382.75
44,840.17	5,120.27	13,272,178.25	53,354.60	8,489.38	13,317,043.47
1,357,326.65	154,992.38	407,285,482.78	1,615,061.11	256,976.22	408,643,567.67
13,710.37	1,565.58	2,813,593.87	16,313.75	2,595.72	2,827,311.90
38,016.67	4,341.10	11,269,315.24	45,235.42	7,197.52	11,307,353.15
794,207.19	90,690.08	234,283,613.39	945,014.34	150,363.48	235,078,264.25
52,882.16	6,038.58	18,016,469.65	62,923.63	10,011.93	18,069,381.35
12,184.83	1,391.38	3,595,329.75	14,498.53	2,306.90	3,607,521.39
4,142.84	473.07	1,251,386.74	4,929.50	784.34	1,255,531.89
61,655.24	7,040.38	19,128,474.17	73,362.57	11,672.89	19,190,163.85
1,187.33	718.35	1,430,857.79	1,412.79	1,191.01	1,431,079.57
2,897.10	-	346,021.95	3,447.21	-	349,469.16
2,374.67	-	259,139.39	2,825.58	-	261,964.98
74,279.65	-	8,183,846.17	88,384.16	-	8,272,230.33
146,374.61	89,077.30	15,704,302.19	174,168.79	147,689.50	15,730,781.48
91,994.69	-	10,845,957.53	109,463.00	-	10,955,420.52
108,854.84	66,269.59	11,682,185.62	129,524.62	109,874.49	11,701,835.75
46,401.04	-	4,611,838.05	55,211.85	-	4,667,049.89
-	-	116,457.07	-	-	116,457.07
-	-	7,388.47	-	-	7,388.47
-	-	2,840.80	-	-	2,840.80
165.80	10.98	21,116.37	197.28	18.20	21,295.45
3,411.75	389.59	1,034,726.04	4,059.59	645.93	1,038,139.69
569.92	344.27	61,212.37	678.14	570.80	61,319.70
3,762,533.62	**495,652.54**	**904,123,262.29**	**4,476,978.13**	**821,788.23**	**907,778,452.19**

NATIONAL FUEL GAS DISTRIBUTION - PENNSYLVANIA DIVISION
MONTHLY PLANT BRINGFORWARD FOR FFTY

2027			2027		
May			June		
Additions	Retirements	Ending Balance	Additions	Retirements	Ending Balance
-	-	24,487,946.38	-	-	24,487,946.38
591.61	26.07	57,104.00	628.15	82.27	57,649.89
113.29	4.99	11,479.04	120.28	15.75	11,583.57
29.37	1.29	3,008.61	31.18	4.08	3,035.71
4,984.65	219.69	505,446.86	5,292.53	693.15	510,046.24
36,239.44	1,597.21	3,717,263.97	38,477.74	5,039.35	3,750,702.37
49,159.32	509.80	3,059,649.29	52,195.61	1,608.46	3,110,236.44
4,498.24	46.65	271,178.22	4,776.07	147.18	275,807.11
160.65	1.67	5,792.21	170.57	5.26	5,957.53
1,256,743.51	13,032.78	78,049,620.68	1,334,365.36	41,119.77	79,342,866.27
139,638.17	1,448.09	5,506,816.75	148,262.82	4,568.86	5,650,510.71
155,992.48	1,617.69	9,452,996.46	165,627.24	5,103.96	9,613,519.73
105,788.00	1,892.41	16,470,278.33	112,321.91	5,970.76	16,576,629.49
86,897.28	1,554.48	13,402,386.27	92,264.43	4,904.55	13,489,746.15
2,630,409.09	47,054.69	411,226,922.08	2,792,874.38	148,462.34	413,871,334.11
26,569.79	475.30	2,853,406.39	28,210.85	1,499.62	2,880,117.62
73,673.78	1,317.93	11,379,709.00	78,224.19	4,158.21	11,453,774.99
1,539,120.90	27,532.92	236,589,852.22	1,634,183.57	86,869.19	238,137,166.61
102,482.12	1,833.28	18,170,030.20	108,811.85	5,784.17	18,273,057.88
23,613.39	422.41	3,630,712.36	25,071.86	1,332.76	3,654,451.46
8,028.55	143.62	1,263,416.83	8,524.43	453.14	1,271,488.12
119,483.76	2,137.41	19,307,510.20	126,863.59	6,743.76	19,427,630.03
2,300.98	218.09	1,433,162.46	2,443.09	688.08	1,434,917.47
5,614.38	-	355,083.54	5,961.15	-	361,044.69
4,601.95	-	266,566.93	4,886.19	-	271,453.11
143,949.05	-	8,416,179.38	152,839.95	-	8,569,019.33
283,664.30	27,043.29	15,987,402.48	301,184.62	85,324.35	16,203,262.75
178,279.61	-	11,133,700.13	189,290.92	-	11,322,991.04
210,953.46	20,119.02	11,892,670.19	223,982.85	63,477.56	12,053,175.48
89,922.13	-	4,756,972.03	95,476.11	-	4,852,448.14
-	-	116,457.07	-	-	116,457.07
-	-	7,388.47	-	-	7,388.47
-	-	2,840.80	-	-	2,840.80
321.30	3.33	21,613.42	341.15	10.51	21,944.06
6,611.75	118.28	1,044,633.17	7,020.12	373.17	1,051,280.12
1,104.47	104.52	62,319.65	1,172.69	329.77	63,162.57
7,291,540.79	**150,476.92**	**914,919,516.06**	**7,741,897.46**	**474,770.03**	**922,186,643.49**

NATIONAL FUEL GAS DISTRIBUTION - PENNSYLVANIA DIVISION
MONTHLY PLANT BRINGFORWARD FOR FFTY

2027			2027		
July			August		
Additions	Retirements	Ending Balance	Additions	Retirements	Ending Balance
-	-	24,487,946.38	-	-	24,487,946.38
702.14	125.80	58,226.23	767.73	36.19	58,957.77
134.45	24.09	11,693.94	147.01	6.93	11,834.02
34.86	6.25	3,064.32	38.11	1.80	3,100.64
5,915.89	1,059.90	514,902.22	6,468.55	304.88	521,065.89
43,009.70	7,705.70	3,786,006.36	47,027.65	2,216.53	3,830,817.48
58,343.27	2,459.51	3,166,120.21	63,793.67	707.47	3,229,206.41
5,338.60	225.05	280,920.65	5,837.33	64.74	286,693.25
190.66	8.04	6,140.16	208.48	2.31	6,346.32
1,491,528.63	62,876.54	80,771,518.36	1,630,866.47	18,086.31	82,384,298.52
165,725.40	6,986.28	5,809,249.83	181,207.39	2,009.59	5,988,447.62
185,135.03	7,804.51	9,790,850.25	202,430.25	2,244.95	9,991,035.55
125,551.33	9,129.93	16,693,050.90	137,280.28	2,626.21	16,827,704.97
103,131.45	7,499.58	13,585,378.02	112,765.94	2,157.24	13,695,986.72
3,121,822.73	227,014.86	416,766,141.98	3,413,461.82	65,300.38	420,114,303.41
31,533.56	2,293.08	2,909,358.10	34,479.41	659.60	2,943,177.91
87,437.54	6,358.34	11,534,854.18	95,605.91	1,828.97	11,628,631.12
1,826,659.82	132,832.31	239,830,994.12	1,997,305.45	38,208.96	241,790,090.62
121,627.86	8,844.62	18,385,841.12	132,990.27	2,544.14	18,516,287.25
28,024.85	2,037.93	3,680,438.38	30,642.92	586.21	3,710,495.10
9,528.45	692.90	1,280,323.67	10,418.59	199.31	1,290,542.96
141,805.75	10,311.93	19,559,123.85	155,053.17	2,966.21	19,711,210.81
2,730.84	1,052.15	1,436,596.17	2,985.96	302.65	1,439,279.48
6,663.26	-	367,707.95	7,285.74	-	374,993.69
5,461.69	-	276,914.80	5,971.92	-	282,886.72
170,841.64	-	8,739,860.98	186,801.58	-	8,926,662.56
336,658.53	130,470.10	16,409,451.17	368,109.00	37,529.47	16,740,030.70
211,585.84	-	11,534,576.89	231,352.09	-	11,765,928.97
250,363.84	97,064.01	12,206,475.31	273,752.70	27,920.27	12,452,307.73
106,721.41	-	4,959,169.55	116,691.27	-	5,075,860.82
-	-	116,457.07	-	-	116,457.07
-	-	7,388.47	-	-	7,388.47
-	-	2,840.80	-	-	2,840.80
381.33	16.08	22,309.31	416.95	4.62	22,721.64
7,846.96	570.62	1,058,556.45	8,580.02	164.14	1,066,972.33
1,310.81	504.25	63,969.12	1,433.26	145.05	65,257.33
8,653,748.13	**725,974.35**	**930,114,417.27**	**9,462,176.87**	**208,825.11**	**939,367,769.03**

NATIONAL FUEL GAS DISTRIBUTION - PENNSYLVANIA DIVISION
MONTHLY PLANT BRINGFORWARD FOR FFTY

2027			2027		
September			October		
Additions	Retirements	Ending Balance	Additions	Retirements	Ending Balance
-	-	24,487,946.38	-	-	24,487,946.38
1,386.43	141.55	60,202.66	192.07	74.25	60,320.48
265.49	27.10	12,072.40	36.78	14.22	12,094.97
68.83	7.03	3,162.44	9.54	3.69	3,168.29
11,681.45	1,192.61	531,554.73	1,618.31	625.59	532,547.44
84,926.50	8,670.55	3,907,073.43	11,765.42	4,548.19	3,914,290.66
115,204.01	2,767.46	3,341,642.95	23,279.73	2,117.49	3,362,805.19
10,541.54	253.23	296,981.56	2,130.17	193.76	298,917.97
376.48	9.04	6,713.76	76.08	6.92	6,782.92
2,945,156.51	70,749.40	85,258,705.63	595,139.54	54,132.96	85,799,712.21
327,239.61	7,861.04	6,307,826.19	66,126.62	6,014.77	6,367,938.03
365,565.65	8,781.72	10,347,819.47	73,871.31	6,719.22	10,414,971.56
247,912.33	10,273.10	17,065,344.19	30,091.32	4,721.43	17,090,714.08
203,642.27	8,438.62	13,891,190.37	24,717.87	3,878.31	13,912,029.92
6,164,317.83	255,439.74	426,023,181.51	748,217.93	117,397.85	426,654,001.60
62,265.84	2,580.20	3,002,863.55	7,557.76	1,185.84	3,009,235.47
172,653.23	7,154.48	11,794,129.87	20,956.45	3,288.14	11,811,798.18
3,606,902.98	149,464.45	245,247,529.15	437,801.81	68,692.54	245,616,638.42
240,165.07	9,952.07	18,746,500.25	29,150.96	4,573.88	18,771,077.33
55,337.57	2,293.10	3,763,539.57	6,716.81	1,053.89	3,769,202.49
18,814.77	779.65	1,308,578.08	2,283.72	358.32	1,310,503.47
280,008.12	11,603.10	19,979,615.83	33,987.07	5,332.68	20,008,270.22
5,392.30	1,183.89	1,443,487.88	645.51	536.62	1,443,596.77
13,157.20	-	388,150.89	1,575.05	-	389,725.94
10,784.59	-	293,671.32	1,291.02	-	294,962.34
337,342.08	-	9,264,004.64	40,383.25	-	9,304,387.89
664,762.34	146,806.46	17,257,986.58	79,578.75	66,543.30	17,271,022.03
417,795.15	65,640.00	12,118,084.12	50,014.29	-	12,168,098.41
494,365.76	109,217.54	12,837,455.95	59,180.57	49,505.29	12,847,131.23
210,730.95	309,457.00	4,977,134.77	25,226.62	-	5,002,361.39
-	-	116,457.07	-	-	116,457.07
-	-	7,388.47	-	-	7,388.47
-	-	2,840.80	-	-	2,840.80
752.97	18.09	23,456.52	152.16	13.84	23,594.83
15,494.52	642.07	1,081,824.78	1,880.71	295.09	1,083,410.40
2,588.30	567.39	67,278.25	309.85	257.18	67,330.91
17,087,598.67	**1,191,971.70**	**955,263,396.01**	**2,375,965.04**	**402,085.27**	**957,237,275.78**

NATIONAL FUEL EXHIBIT JJS-2

NATIONAL FUEL GAS DISTRIBUTION – PENNSYLVANIA DIVISION
MONTHLY RESERVE BRINGFORWARD FOR FFTY

Account	6/30/2026 Ending Balance	2026 October Accruals	Amort. of NS	Retirements	Cost of Removal	Salvage	Ending Balance
30300	22,593,631.00	29,762.27	-	-	-	-	22,623,393.27
32540	35,810.00	39.82	-	79.39	-	-	35,770.43
32800	9,773.00	5.12	-	15.20	-	-	9,762.92
32900	1,403.00	5.86	-	3.94	-	-	1,404.92
33200	171,978.00	939.05	-	668.94	-	-	172,248.11
33400	1,733,727.00	8,788.15	469.92	4,863.33	799.80	-	1,737,321.94
36520	682,851.00	2,784.24	-	1,552.28	-	-	684,082.96
36620	118,684.00	356.67	25.31	142.04	42.61	-	118,881.33
36630	3,593.00	3.18	-	5.07	-	-	3,591.11
36710	20,383,572.00	90,583.17	5,989.46	39,683.50	16,833.84	-	20,423,627.29
36720	2,294,098.00	12,278.31	51.69	4,409.28	144.72	-	2,301,874.00
36900	4,412,402.00	10,545.31	1,110.54	4,925.69	3,926.57	-	4,415,205.59
37420	3,338,953.00	16,038.63	1,061.54	5,762.21	5,606.67	-	3,344,684.29
37500	6,551,188.00	31,816.60	5,263.00	4,733.24	3,436.91	0.46	6,580,097.91
37610	114,664,307.00	542,207.19	84,522.85	143,276.72	96,984.59	858.94	115,051,634.67
37620	1,732,866.00	5,553.33	56.54	1,447.24	113.59	-	1,736,915.04
37800	4,293,395.00	25,055.80	4,291.85	4,012.96	1,099.86	-	4,317,629.83
38000	87,631,319.00	370,267.15	24,860.23	83,834.94	15,831.92	-	87,926,779.52
38100	6,622,195.00	40,419.64	-	5,582.14	-	-	6,657,032.50
38200	1,924,742.00	4,404.36	-	1,286.21	-	-	1,927,860.15
38400	604,497.00	1,637.72	-	437.31	-	-	605,697.41
38500	7,424,326.00	26,347.97	2,277.23	6,508.21	4,061.19	0.11	7,442,381.91
39011	98,290.00	5,185.13	13.08	664.05	-	-	102,824.16
39110	138,489.00	862.33	-	-	-	-	139,351.33
39120	210,181.00	189.06	-	-	-	-	210,370.06
39130	3,553,490.00	107,585.28	-	-	-	-	3,661,075.28
39200	7,508,111.00	-	-	82,344.07	-	-	7,425,766.93
39400	2,350,040.00	31,540.52	-	-	-	-	2,381,580.52
39600	2,967,643.00	-	-	61,260.37	-	-	2,906,382.63
39700	1,603,148.00	32,629.89	-	-	-	-	1,635,777.89
32550	-	-	-	-	-	-	-
36510	(106.00)	-	-	10.15	-	-	(116.15)
37410	12,895.00	-	451.08	360.14	720.28	45.73	12,311.39
38910	(20,689.00)	-	-	318.25	-	-	(21,007.25)
	305,650,802.00	**1,397,831.75**	**130,444.32**	**458,186.86**	**149,602.55**	**905.24**	**306,572,193.90**

NATIONAL FUEL GAS DISTRIBUTION – PENNSYLVANIA DIVISION
MONTHLY RESERVE BRINGFORWARD FOR FFTY

2026						2026					
November						December					
Accruals	Amort. of NS	Retirements	Cost of Removal	Salvage	Ending Balance	Accruals	Amort. of NS	Retirements	Cost of Removal	Salvage	Ending Balance
29,762.27	-	-	-	-	22,653,155.54	29,762.27	-	-	-	-	22,682,917.81
39.96	-	138.78	-	-	35,671.61	40.15	-	49.06	-	-	35,662.69
5.14	-	26.57	-	-	9,741.48	5.16	-	9.39	-	-	9,737.25
5.88	-	6.89	-	-	1,403.91	5.91	-	2.44	-	-	1,407.38
942.19	-	1,169.30	-	-	172,021.00	946.40	-	413.38	-	-	172,554.02
8,817.24	469.92	8,501.05	1,398.03	-	1,736,710.02	8,856.13	469.92	3,005.35	494.24	-	1,742,536.48
2,806.77	-	2,713.36	-	-	684,176.37	2,833.66	-	959.25	-	-	686,050.78
359.66	25.31	248.28	74.48	-	118,943.54	363.22	25.31	87.77	26.33	-	119,217.97
3.23	-	8.87	-	-	3,585.47	3.29	-	3.13	-	-	3,585.63
91,317.80	5,989.46	69,366.33	29,425.37	-	20,422,142.85	92,194.97	5,989.46	24,522.91	10,402.68	-	20,485,401.68
12,442.07	51.69	7,707.37	252.96	-	2,306,407.43	12,637.60	51.69	2,724.77	89.43	-	2,316,282.52
10,633.12	1,110.54	8,610.05	6,863.60	-	4,411,475.60	10,737.97	1,110.54	3,043.89	2,426.47	-	4,417,853.75
16,084.92	1,061.54	10,072.27	9,800.40	-	3,341,958.08	16,141.31	1,061.54	3,560.83	3,464.71	-	3,352,135.39
31,909.33	5,263.00	8,273.65	6,007.69	0.80	6,602,989.70	32,022.27	5,263.00	2,924.96	2,123.88	0.28	6,635,226.40
543,765.66	84,522.85	250,446.18	169,528.03	1,501.42	115,261,450.39	545,663.84	84,522.85	88,539.64	59,932.84	530.79	115,743,695.39
5,576.85	56.54	2,529.76	198.56	-	1,739,820.11	5,605.51	56.54	894.34	70.20	-	1,744,517.62
25,128.71	4,291.85	7,014.62	1,922.54	-	4,338,113.23	25,217.52	4,291.85	2,479.86	679.67	-	4,364,463.07
371,350.03	24,860.23	146,542.58	27,674.02	-	88,148,773.17	372,668.95	24,860.23	51,806.85	9,783.53	-	88,484,711.97
40,521.76	-	9,757.51	-	-	6,687,796.75	40,646.13	-	3,449.55	-	-	6,724,993.33
4,417.24	-	2,248.28	-	-	1,930,029.12	4,432.92	-	794.83	-	-	1,933,667.21
1,642.40	-	764.41	-	-	606,575.40	1,648.09	-	270.24	-	-	607,953.24
26,421.17	2,277.23	11,376.27	7,098.92	0.20	7,452,605.32	26,510.33	2,277.23	4,021.83	2,509.66	0.07	7,474,861.47
5,186.10	13.08	1,160.75	-	-	106,862.60	5,188.24	13.08	410.36	-	-	111,653.56
869.86	-	-	-	-	140,221.19	878.63	-	-	-	-	141,099.82
190.87	-	-	-	-	210,560.93	192.98	-	-	-	-	210,753.91
108,607.27	-	-	-	-	3,769,682.55	109,798.75	-	-	-	-	3,879,481.30
-	-	143,936.56	-	-	7,281,830.37	-	-	50,885.55	-	-	7,230,944.82
31,819.53	-	-	-	-	2,413,400.05	32,144.80	-	-	-	-	2,445,544.85
-	-	107,082.46	-	-	2,799,300.17	-	-	37,856.61	-	-	2,761,443.57
32,975.50	-	-	-	-	1,668,753.39	33,378.44	-	-	-	-	1,702,131.83
-	-	-	-	-	-	-	-	-	-	-	-
-	-	17.73	-	-	(133.88)	-	-	6.27	-	-	(140.15)
-	451.08	629.52	1,259.03	79.94	10,953.87	-	451.08	222.55	445.10	28.26	10,765.55
-	-	556.30	-	-	(21,563.55)	-	-	196.67	-	-	(21,760.22)
1,403,602.53	**130,444.32**	**800,905.72**	**261,503.63**	**1,582.36**	**307,045,413.77**	**1,410,525.44**	**130,444.32**	**283,142.28**	**92,448.74**	**559.40**	**308,211,351.90**

NATIONAL FUEL GAS DISTRIBUTION – PENNSYLVANIA DIVISION
MONTHLY RESERVE BRINGFORWARD FOR FFTY

2027						2027					
January						Febuary					
Accruals	Amort. of NS	Retirements	Cost of Removal	Salvage	Ending Balance	Accruals	Amort. of NS	Retirements	Cost of Removal	Salvage	Ending Balance
29,762.27	-	-	-	-	22,712,680.08	29,762.27	-	-	-	-	22,742,442.35
40.34	-	81.63	-	-	35,621.40	40.50	-	75.24	-	-	35,586.66
5.18	-	15.63	-	-	9,726.80	5.20	-	14.41	-	-	9,717.59
5.93	-	4.05	-	-	1,409.26	5.95	-	3.74	-	-	1,411.47
950.60	-	687.77	-	-	172,816.85	954.22	-	633.97	-	-	173,137.10
8,895.02	469.92	5,000.23	822.31	-	1,746,078.88	8,928.48	469.92	4,609.08	757.98	-	1,750,110.22
2,858.79	-	1,595.97	-	-	687,313.60	2,881.79	-	1,471.13	-	-	688,724.26
366.55	25.31	146.04	43.81	-	119,419.98	369.60	25.31	134.61	40.38	-	119,639.90
3.34	-	5.22	-	-	3,583.75	3.39	-	4.81	-	-	3,582.33
93,014.38	5,989.46	40,800.60	17,307.71	-	20,526,297.22	93,764.30	5,989.46	37,608.89	15,953.78	-	20,572,488.31
12,820.25	51.69	4,533.40	148.79	-	2,324,472.27	12,987.41	51.69	4,178.77	137.15	-	2,333,195.46
10,835.91	1,110.54	5,064.35	4,037.10	-	4,420,698.75	10,925.55	1,110.54	4,668.18	3,721.29	-	4,424,345.37
16,194.67	1,061.54	5,924.41	5,764.50	-	3,357,702.69	16,242.93	1,061.54	5,460.96	5,313.56	-	3,364,232.64
32,129.15	5,263.00	4,866.48	3,533.66	0.47	6,664,218.88	32,225.82	5,263.00	4,485.79	3,257.23	0.44	6,693,965.12
547,460.00	84,522.85	147,309.98	99,714.72	883.12	116,129,536.66	549,084.72	84,522.85	135,786.39	91,914.35	814.04	116,536,257.53
5,632.62	56.54	1,487.98	116.79	-	1,748,602.01	5,657.14	56.54	1,371.58	107.66	-	1,752,836.45
25,301.56	4,291.85	4,125.93	1,130.82	-	4,388,799.73	25,377.58	4,291.85	3,803.17	1,042.36	-	4,413,623.62
373,917.00	24,860.23	86,194.91	16,277.59	-	88,781,016.70	375,045.91	24,860.23	79,452.15	15,004.24	-	89,086,466.45
40,763.83	-	5,739.27	-	-	6,760,017.88	40,870.28	-	5,290.31	-	-	6,795,597.85
4,447.76	-	1,322.41	-	-	1,936,792.56	4,461.19	-	1,218.97	-	-	1,940,034.78
1,653.48	-	449.62	-	-	609,157.10	1,658.36	-	414.45	-	-	610,401.02
26,594.70	2,277.23	6,691.41	4,175.51	0.12	7,492,866.59	26,671.02	2,277.23	6,167.96	3,848.88	0.11	7,511,798.11
5,190.84	13.08	682.74	-	-	116,174.74	5,192.72	13.08	629.33	-	-	120,751.21
886.69	-	-	-	-	141,986.51	894.18	-	-	-	-	142,880.69
194.93	-	-	-	-	210,948.84	196.73	-	-	-	-	211,145.57
110,894.00	-	-	-	-	3,990,375.30	111,911.15	-	-	-	-	4,102,286.45
-	-	84,662.07	-	-	7,146,282.75	-	-	78,039.22	-	-	7,068,243.53
32,443.81	-	-	-	-	2,477,988.66	32,721.50	-	-	-	-	2,510,710.16
-	-	62,984.85	-	-	2,698,458.71	-	-	58,057.75	-	-	2,640,400.97
33,748.83	-	-	-	-	1,735,880.66	34,092.81	-	-	-	-	1,769,973.47
-	-	-	-	-	-	-	-	-	-	-	-
-	-	10.43	-	-	(150.58)	-	-	9.62	-	-	(160.20)
-	451.08	370.28	740.55	47.02	10,152.83	-	451.08	341.31	682.62	43.34	9,623.32
-	-	327.21	-	-	(22,087.43)	-	-	301.61	-	-	(22,389.04)
1,417,012.43	**130,444.32**	**471,084.88**	**153,813.86**	**930.73**	**309,134,840.64**	**1,422,932.70**	**130,444.32**	**434,233.39**	**141,781.48**	**857.93**	**310,113,060.72**

NATIONAL FUEL GAS DISTRIBUTION – PENNSYLVANIA DIVISION
MONTHLY RESERVE BRINGFORWARD FOR FFTY

2027						2027					
March						April					
Accruals	Amort. of NS	Retirements	Cost of Removal	Salvage	Ending Balance	Accruals	Amort. of NS	Retirements	Cost of Removal	Salvage	Ending Balance
29,762.27	-	-	-	-	22,772,204.62	29,762.27	-	-	-	-	22,801,966.89
40.64	-	85.89	-	-	35,541.41	40.80	-	142.40	-	-	35,439.81
5.22	-	16.45	-	-	9,706.36	5.24	-	27.27	-	-	9,684.33
5.97	-	4.26	-	-	1,413.18	6.00	-	7.07	-	-	1,412.11
957.49	-	723.64	-	-	173,370.95	961.06	-	1,199.79	-	-	173,132.22
8,958.73	469.92	5,261.00	865.19	-	1,753,412.68	8,991.71	469.92	8,722.70	1,434.49	-	1,752,717.12
2,903.18	-	1,679.21	-	-	689,948.24	2,928.13	-	2,784.11	-	-	690,092.26
372.44	25.31	153.65	46.10	-	119,837.89	375.75	25.31	254.76	76.43	-	119,907.77
3.43	-	5.49	-	-	3,580.27	3.48	-	9.10	-	-	3,574.66
94,461.78	5,989.46	42,928.40	18,210.33	-	20,611,800.82	95,275.54	5,989.46	71,174.96	30,192.59	-	20,611,698.26
13,142.89	51.69	4,769.82	156.55	-	2,341,463.67	13,324.28	51.69	7,908.33	259.56	-	2,346,671.75
11,008.91	1,110.54	5,328.46	4,247.64	-	4,426,888.72	11,106.18	1,110.54	8,834.55	7,042.56	-	4,423,228.34
16,287.59	1,061.54	6,233.38	6,065.13	-	3,369,283.26	16,339.07	1,061.54	10,334.89	10,055.93	-	3,366,293.05
32,315.27	5,263.00	5,120.27	3,717.95	0.50	6,722,705.66	32,418.40	5,263.00	8,489.38	6,164.33	0.83	6,745,734.19
550,588.00	84,522.85	154,992.38	104,914.97	929.18	116,912,390.21	552,321.20	84,522.85	256,976.22	173,948.24	1,540.57	117,119,850.37
5,679.83	56.54	1,565.58	122.88	-	1,756,884.36	5,705.99	56.54	2,595.72	203.74	-	1,759,847.43
25,447.91	4,291.85	4,341.10	1,189.79	-	4,437,832.49	25,529.00	4,291.85	7,197.52	1,972.67	-	4,458,483.16
376,090.44	24,860.23	90,690.08	17,126.48	-	89,379,600.56	377,294.74	24,860.23	150,363.48	28,395.58	-	89,602,996.47
40,968.79	-	6,038.58	-	-	6,830,528.06	41,082.35	-	10,011.93	-	-	6,861,598.48
4,473.61	-	1,391.38	-	-	1,943,117.01	4,487.93	-	2,306.90	-	-	1,945,298.05
1,662.87	-	473.07	-	-	611,590.82	1,668.07	-	784.34	-	-	612,474.54
26,741.63	2,277.23	7,040.38	4,393.27	0.12	7,529,383.44	26,823.05	2,277.23	11,672.89	7,284.01	0.20	7,539,527.02
5,194.26	13.08	718.35	-	-	125,240.20	5,195.52	13.08	1,191.01	-	-	129,257.79
901.19	-	-	-	-	143,781.88	909.49	-	-	-	-	144,691.37
198.42	-	-	-	-	211,343.99	200.42	-	-	-	-	211,544.41
112,863.22	-	-	-	-	4,215,149.67	113,989.98	-	-	-	-	4,329,139.65
-	-	89,077.30	-	-	6,979,166.23	-	-	147,689.50	-	-	6,831,476.73
32,981.42	-	-	-	-	2,543,691.58	33,289.03	-	-	-	-	2,576,980.61
-	-	66,269.59	-	-	2,574,131.38	-	-	109,874.49	-	-	2,464,256.89
34,414.78	-	-	-	-	1,804,388.25	34,795.83	-	-	-	-	1,839,184.08
-	-	-	-	-	-	-	-	-	-	-	-
-	-	10.98	-	-	(171.17)	-	-	18.20	-	-	(189.37)
-	451.08	389.59	779.17	49.47	8,955.11	-	451.08	645.93	1,291.86	82.02	7,550.42
-	-	344.27	-	-	(22,733.31)	-	-	570.80	-	-	(23,304.11)
1,428,432.18	**130,444.32**	**495,652.54**	**161,835.45**	**979.27**	**311,015,428.50**	**1,434,830.51**	**130,444.32**	**821,788.23**	**268,321.99**	**1,623.62**	**311,492,216.74**

NATIONAL FUEL GAS DISTRIBUTION – PENNSYLVANIA DIVISION
MONTHLY RESERVE BRINGFORWARD FOR FFTY

2027						2027					
May						June					
Accruals	Amort. of NS	Retirements	Cost of Removal	Salvage	Ending Balance	Accruals	Amort. of NS	Retirements	Cost of Removal	Salvage	Ending Balance
29,762.27	-	-	-	-	22,831,729.16	29,762.27	-	-	-	-	22,861,491.43
41.09	-	26.07	-	-	35,454.83	41.49	-	82.27	-	-	35,414.05
5.27	-	4.99	-	-	9,684.61	5.32	-	15.75	-	-	9,674.18
6.04	-	1.29	-	-	1,416.86	6.09	-	4.08	-	-	1,418.86
967.43	-	219.69	-	-	173,879.96	976.44	-	693.15	-	-	174,163.25
9,050.63	469.92	1,597.21	262.67	-	1,760,377.79	9,133.90	469.92	5,039.35	828.74	-	1,764,113.52
2,965.28	-	509.80	-	-	692,547.74	3,013.75	-	1,608.46	-	-	693,953.03
380.67	25.31	46.65	13.99	-	120,253.11	387.10	25.31	147.18	44.15	-	120,474.19
3.56	-	1.67	-	-	3,576.55	3.66	-	5.26	-	-	3,574.95
96,486.91	5,989.46	13,032.78	5,528.54	-	20,695,613.31	98,067.63	5,989.46	41,119.77	17,443.11	-	20,741,107.52
13,594.30	51.69	1,448.09	47.53	-	2,358,822.12	13,946.66	51.69	4,568.86	149.95	-	2,368,101.66
11,250.97	1,110.54	1,617.69	1,289.56	-	4,432,682.60	11,439.91	1,110.54	5,103.96	4,068.68	-	4,436,060.41
16,418.33	1,061.54	1,892.41	1,841.33	-	3,380,039.17	16,523.45	1,061.54	5,970.76	5,809.59	-	3,385,843.82
32,577.15	5,263.00	1,554.48	1,128.74	0.15	6,780,891.26	32,787.72	5,263.00	4,904.55	3,561.30	0.48	6,810,476.61
554,989.25	84,522.85	47,054.69	31,851.51	282.09	117,680,738.37	558,528.05	84,522.85	148,462.34	100,494.76	890.03	118,075,722.19
5,746.27	56.54	475.30	37.31	-	1,765,137.63	5,799.68	56.54	1,499.62	117.71	-	1,769,376.52
25,653.83	4,291.85	1,317.93	361.21	-	4,486,749.70	25,819.40	4,291.85	4,158.21	1,139.66	-	4,511,563.08
379,148.60	24,860.23	27,532.92	5,199.49	-	89,974,272.89	381,607.49	24,860.23	86,869.19	16,404.92	-	90,277,466.50
41,257.18	-	1,833.28	-	-	6,901,022.39	41,489.05	-	5,784.17	-	-	6,936,727.26
4,509.98	-	422.41	-	-	1,949,385.61	4,539.22	-	1,332.76	-	-	1,952,592.08
1,676.07	-	143.62	-	-	614,006.99	1,686.69	-	453.14	-	-	615,240.54
26,948.37	2,277.23	2,137.41	1,333.77	0.04	7,565,281.47	27,114.60	2,277.23	6,743.76	4,208.18	0.12	7,583,721.49
5,199.70	13.08	218.09	-	-	134,252.49	5,206.67	13.08	688.08	-	-	138,784.15
921.34	-	-	-	-	145,612.71	936.48	-	-	-	-	146,549.19
203.28	-	-	-	-	211,747.69	206.93	-	-	-	-	211,954.62
115,599.33	-	-	-	-	4,444,738.98	117,655.16	-	-	-	-	4,562,394.14
-	-	27,043.29	-	-	6,804,433.43	-	-	85,324.35	-	-	6,719,109.08
33,728.39	-	-	-	-	2,610,709.00	34,289.64	-	-	-	-	2,644,998.64
-	-	20,119.02	-	-	2,444,137.87	-	-	63,477.56	-	-	2,380,660.30
35,340.08	-	-	-	-	1,874,524.16	36,035.33	-	-	-	-	1,910,559.49
-	-	-	-	-	-	-	-	-	-	-	-
-	-	3.33	-	-	(192.70)	-	-	10.51	-	-	(203.21)
-	451.08	118.28	236.55	15.02	7,661.69	-	451.08	373.17	746.34	47.39	7,040.65
-	-	104.52	-	-	(23,408.63)	-	-	329.77	-	-	(23,738.40)
1,444,431.57	**130,444.32**	**150,476.92**	**49,132.20**	**297.30**	**312,867,780.81**	**1,457,009.78**	**130,444.32**	**474,770.03**	**155,017.09**	**938.02**	**313,826,385.81**

NATIONAL FUEL GAS DISTRIBUTION – PENNSYLVANIA DIVISION
MONTHLY RESERVE BRINGFORWARD FOR FFTY

2027						2027					
July						August					
Accruals	Amort. of NS	Retirements	Cost of Removal	Salvage	Ending Balance	Accruals	Amort. of NS	Retirements	Cost of Removal	Salvage	Ending Balance
29,762.27	-	-	-	-	22,891,253.70	29,762.27	-	-	-	-	22,921,015.97
41.89	-	125.80	-	-	35,330.14	42.37	-	36.19	-	-	35,336.33
5.37	-	24.09	-	-	9,655.46	5.43	-	6.93	-	-	9,653.96
6.15	-	6.25	-	-	1,418.77	6.21	-	1.80	-	-	1,423.18
985.53	-	1,059.90	-	-	174,088.88	996.12	-	304.88	-	-	174,780.12
9,217.97	469.92	7,705.70	1,267.24	-	1,764,828.47	9,315.96	469.92	2,216.53	364.52	-	1,772,033.30
3,065.76	-	2,459.51	-	-	694,559.29	3,123.87	-	707.47	-	-	696,975.68
393.99	25.31	225.05	67.52	-	120,600.92	401.70	25.31	64.74	19.42	-	120,943.77
3.77	-	8.04	-	-	3,570.69	3.89	-	2.31	-	-	3,572.26
99,763.58	5,989.46	62,876.54	26,672.38	-	20,757,311.65	101,658.62	5,989.46	18,086.31	7,672.26	-	20,839,201.15
14,324.70	51.69	6,986.28	229.30	-	2,375,262.47	14,747.12	51.69	2,009.59	65.96	-	2,387,985.72
11,642.62	1,110.54	7,804.51	6,221.45	-	4,434,787.61	11,869.13	1,110.54	2,244.95	1,789.59	-	4,443,732.73
16,634.84	1,061.54	9,129.93	8,883.49	-	3,385,526.78	16,760.38	1,061.54	2,626.21	2,555.32	-	3,398,167.17
33,010.82	5,263.00	7,499.58	5,445.62	0.73	6,835,805.96	33,262.28	5,263.00	2,157.24	1,566.42	0.21	6,870,607.79
562,277.68	84,522.85	227,014.86	153,667.28	1,360.95	118,343,201.53	566,503.69	84,522.85	65,300.38	44,202.09	391.47	118,885,117.07
5,856.28	56.54	2,293.08	179.99	-	1,772,816.27	5,920.07	56.54	659.60	51.77	-	1,778,081.51
25,994.83	4,291.85	6,358.34	1,742.67	-	4,533,748.75	26,192.56	4,291.85	1,828.97	501.28	-	4,561,902.91
384,212.87	24,860.23	132,832.31	25,084.89	-	90,528,622.40	387,149.26	24,860.23	38,208.96	7,215.62	-	90,895,207.31
41,734.75	-	8,844.62	-	-	6,969,617.40	42,011.65	-	2,544.14	-	-	7,009,084.91
4,570.20	-	2,037.93	-	-	1,955,124.34	4,605.12	-	586.21	-	-	1,959,143.26
1,697.94	-	692.90	-	-	616,245.59	1,710.62	-	199.31	-	-	617,756.90
27,290.73	2,277.23	10,311.93	6,434.76	0.18	7,596,542.94	27,489.23	2,277.23	2,966.21	1,850.95	0.05	7,621,492.29
5,212.90	13.08	1,052.15	-	-	142,957.99	5,220.82	13.08	302.65	-	-	147,889.24
952.98	-	-	-	-	147,502.17	971.23	-	-	-	-	148,473.40
210.91	-	-	-	-	212,165.53	215.31	-	-	-	-	212,380.84
119,897.28	-	-	-	-	4,682,291.42	122,374.65	-	-	-	-	4,804,666.07
-	-	130,470.10	-	-	6,588,638.98	-	-	37,529.47	-	-	6,551,109.51
34,901.75	-	-	-	-	2,679,900.39	35,578.08	-	-	-	-	2,715,478.47
-	-	97,064.01	-	-	2,283,596.29	-	-	27,920.27	-	-	2,255,676.02
36,793.57	-	-	-	-	1,947,353.06	37,631.36	-	-	-	-	1,984,984.42
-	-	-	-	-	-	-	-	-	-	-	-
-	-	16.08	-	-	(219.29)	-	-	4.62	-	-	(223.91)
-	451.08	570.62	1,141.24	72.46	5,852.33	-	451.08	164.14	328.28	20.84	5,831.83
-	-	504.25	-	-	(24,242.65)	-	-	145.05	-	-	(24,387.70)
1,470,463.93	**130,444.32**	**725,974.35**	**237,037.83**	**1,434.32**	**314,465,716.20**	**1,485,529.00**	**130,444.32**	**208,825.11**	**68,183.48**	**412.57**	**315,805,093.50**

NATIONAL FUEL GAS DISTRIBUTION – PENNSYLVANIA DIVISION
MONTHLY RESERVE BRINGFORWARD FOR FFTY

2027						2027					
September						October					
Accruals	Amort. of NS	Retirements	Cost of Removal	Salvage	Ending Balance	Accruals	Amort. of NS	Retirements	Cost of Removal	Salvage	Ending Balance
29,762.27	-	-	-	-	22,950,778.24	29,762.27	-	-	-	-	22,980,540.51
43.08	-	141.55	-	-	35,237.86	43.57	-	74.25	-	-	35,207.18
5.52	-	27.10	-	-	9,632.37	5.58	-	14.22	-	-	9,623.74
6.31	-	7.03	-	-	1,422.46	6.38	-	3.69	-	-	1,425.16
1,012.14	-	1,192.61	-	-	174,599.65	1,023.18	-	625.59	-	-	174,997.23
9,464.04	469.92	8,670.55	1,425.91	-	1,771,870.80	9,566.13	469.92	4,548.19	747.97	-	1,776,610.69
3,209.61	-	2,767.46	-	-	697,417.83	3,274.87	-	2,117.49	-	-	698,575.21
413.06	25.31	253.23	75.97	-	121,052.94	421.71	25.31	193.76	58.13	-	121,248.07
4.07	-	9.04	-	-	3,567.29	4.20	-	6.92	-	-	3,564.57
104,454.49	5,989.46	70,749.40	30,012.07	-	20,848,883.63	106,582.55	5,989.46	54,132.96	22,963.34	-	20,884,359.34
15,370.34	51.69	7,861.04	258.01	-	2,395,288.70	15,844.71	51.69	6,014.77	197.41	-	2,404,972.92
12,203.31	1,110.54	8,781.72	7,000.45	-	4,441,264.41	12,457.67	1,110.54	6,719.22	5,356.30	-	4,442,757.10
16,946.52	1,061.54	10,273.10	9,995.81	-	3,395,906.32	17,078.03	1,061.54	4,721.43	4,593.99	-	3,404,730.47
33,635.14	5,263.00	8,438.62	6,127.47	0.82	6,894,940.66	33,898.54	5,263.00	3,878.31	2,816.13	0.38	6,927,408.14
572,769.99	84,522.85	255,439.74	172,908.19	1,531.36	119,115,593.34	577,196.86	84,522.85	117,397.85	79,467.08	703.80	119,581,151.92
6,014.65	56.54	2,580.20	202.52	-	1,781,369.98	6,081.47	56.54	1,185.84	93.08	-	1,786,229.08
26,485.74	4,291.85	7,154.48	1,960.87	-	4,583,565.15	26,692.86	4,291.85	3,288.14	901.20	-	4,610,360.52
391,503.32	24,860.23	149,464.45	28,225.80	-	91,133,880.62	394,579.27	24,860.23	68,692.54	12,972.33	-	91,471,655.25
42,422.25	-	9,952.07	-	-	7,041,555.09	42,712.32	-	4,573.88	-	-	7,079,693.53
4,656.90	-	2,293.10	-	-	1,961,507.06	4,693.48	-	1,053.89	-	-	1,965,146.65
1,729.42	-	779.65	-	-	618,706.66	1,742.70	-	358.32	-	-	620,091.04
27,783.58	2,277.23	11,603.10	7,240.46	0.20	7,632,709.74	27,991.52	2,277.23	5,332.68	3,327.65	0.09	7,654,318.25
5,233.33	13.08	1,183.89	-	-	151,951.76	5,241.17	13.08	536.62	-	-	156,669.38
997.96	-	-	-	-	149,471.36	1,017.22	-	-	-	-	150,488.58
221.75	-	-	-	-	212,602.59	226.40	-	-	-	-	212,828.99
126,005.35	-	-	-	-	4,930,671.42	128,621.83	-	-	-	-	5,059,293.25
-	-	146,806.46	-	-	6,404,303.05	-	-	66,543.30	-	-	6,337,759.74
36,469.05	-	65,640.00	-	-	2,686,307.52	37,083.13	-	-	-	-	2,723,390.65
-	-	109,217.54	-	-	2,146,458.48	-	-	49,505.29	-	-	2,096,953.19
37,698.73	-	309,457.00	-	-	1,713,226.15	37,423.11	-	-	-	-	1,750,649.26
-	-	-	-	-	-	-	-	-	-	-	-
-	-	18.09	-	-	(242.00)	-	-	13.84	-	-	(255.84)
-	451.08	642.07	1,284.14	81.53	4,438.24	-	451.08	295.09	590.18	37.47	4,041.52
-	-	567.39	-	-	(24,955.09)	-	-	257.18	-	-	(25,212.27)
1,506,521.92	**130,444.32**	**1,191,971.70**	**266,717.67**	**1,613.91**	**315,984,984.28**	**1,521,272.73**	**130,444.32**	**402,085.27**	**134,084.79**	**741.74**	**317,101,273.01**

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 8-R

Rebuttal Testimony of John J. Spanos

Topics Addressed: **Depreciation**

Dated: May 12, 2026

I. INTRODUCTION

Q. Please state your name and address.

A. John J. Spanos. My business address is 300 Sterling Parkway, Mechanicsburg, Pennsylvania, 17050 (formerly 207 Senate Avenue, Camp Hill, Pennsylvania, 17011).

Q. With what firm are you associated and in what capacity?

A. I am associated with the firm of Gannett Fleming Valuation and Rate Consultants, LLC (Gannett Fleming), a subsidiary of GFT Infrastructure, Inc., as President.

Q. How long have you been associated with Gannett Fleming?

A. I have been associated with the firm since June 1986.

Q. Have you previously filed testimony in this matter?

A. Yes, I previously submitted National Fuel Gas Statement No. 8 in January 2026.

Q. What is the purpose of your rebuttal testimony?

A. My rebuttal testimony responds to the depreciation-related testimony of Brian C. Andrews on behalf of the Pennsylvania Office of Consumer Advocate ("OCA"). Mr. Andrews has proposed the use of the Average Life Group ("ALG") procedure to calculate depreciation expense and depreciation annual accrual rates in an effort to "mitigate rate increases associated with National Fuel's accelerated investment to updated its infrastructure."[1]

Q. Please summarize your rebuttal testimony.

A. Mr. Andrews has proposed a reduction in depreciation expense of $4.67 million based on an issue that the Commission has already clearly addressed and decided

[1] OCA Statement 4, p. 3, lines 14-15

consistently for almost 40 years. The issue relates to the depreciation procedure that National Fuel Gas Distribution Corporation ("National Fuel" or "Company") has been utilizing for developing depreciation rates and expense for 40 years. National Fuel uses the Equal Life Group ("ELG") procedure instead of the Average Life Group ("ALG") procedure. The Average Life Group procedure is most commonly identified in Pennsylvania as the Average Service Life ("ASL") procedure. The use of the ELG procedure was established with the Pennsylvania Public Utility Commission ("PUC") during the 1980s and has been used by most utilities within the Commonwealth of Pennsylvania to calculate depreciation expense and annual depreciation accrual rates since that time spanning a period of approximately 40 years.

In my testimony, I will address the following topics. First, I will explain Mr. Andrews' lack of understanding of how depreciation expense and annual depreciation accrual rates are calculated within the confines of a rate case in the State of Pennsylvania. Second, I will explain the impact of proposing such an excessive reduction of depreciation expense to the Company without any change in operation or practice. Third, I will address how Mr. Andrews' proposed depreciation rates and his perspective on his justification of those rates are completely misinformed. Mr. Andrews clearly ignores all of the components of how depreciation rates are established in Pennsylvania and quite disturbingly is selective on following the proper concepts of depreciation. Fourth, I will explain why the recent decisions regarding ELG in other state jurisdictions that Mr. Andrews uses to support his ALG proposal are not applicable in this case. And

lastly, I will show that the Company's proposed composite annual depreciation accrual rate of 2.45% calculated as of October 31, 2027 is consistent with the range of composite annual depreciation accrual rates of other gas distribution utilities within the United States regardless of the depreciation procedure utilized.

II. EQUAL LIFE GROUP VS AVERAGE LIFE GROUP

Q. What is the equal life group procedure?

A. For the ELG procedure, a group of property (e.g., a vintage within a property account) is subdivided into groups having equal service lives. The size of these "equal life groups" is based on the estimated survivor characteristics of the account. Depreciation can then be calculated for each equal life group based on the straight line method, meaning that an equal amount of the group's service value is recorded as depreciation expense in each year of service. The total depreciation for an account is then the summation of the calculated depreciation for each equal life group. Based on the survivor curve estimate for an account, the ELG procedure mathematically estimates the life for each unit in the account, and then depreciates each unit over its expected life. The procedure is also known as the Unit Summation Procedure.

Q. How does the ELG procedure differ from the ASL (also referred to as ALG) procedure?

While the ELG procedure calculates depreciation for each equal life group, the ASL (or ALG) procedure depreciates every asset within an account over the average life of the entire account. Using equal life groups, rather than an average life, as the basis for depreciation provides a more precise calculation that better matches

recovery with consumption of assets by depreciating assets that have shorter lives than the average over their shorter lives (and the longer-lived assets over their longer lives) as opposed to depreciating all assets over the average life for the group.

Q. Is ELG supported by depreciation authorities?

A. Yes. ELG is discussed and supported in authoritative depreciation texts and academic literature. For example, Robley Winfrey, who developed the Iowa survivor curves at Iowa State University and is regarded as a pioneer of utility depreciation practices, referred to the ELG procedure as "the only mathematically correct procedure."[2]

Depreciation Systems by Wolf and Fitch, also supports the appropriateness of ELG stating, "Application of the equal life group procedure is generally considered to better match the consumption of capital with service provided than does application of the average life procedure."[3]

Q. Please explain how depreciation is determined using the ELG procedure.

A. A simple two-unit example will demonstrate how the ELG procedure more appropriately matches cost recovery to consumption than the ASL procedure. In this example, each unit costs $1,000. Unit A will be in service for 5 years, and unit B will be in service for 15 years. There is no net salvage for these units.

[2] Robley Winfrey, Depreciation of Group Properties, Bulletin 155 (Ames, IA: Iowa State University Press, 1942, reprinted 1969); p. 71

[3] Frank K. Wolf and W. Chester Fitch, *Depreciation Systems* (Ames, IA: Iowa State University Press, 1994); p.75

For the ASL procedure, the average service life for the two units is 10 years ([5+15]/2), so the annual depreciation rate is 10% (1/10) throughout the lives of both units. For the first five years, the total annual depreciation amount is $200 ($2,000 x 10%). At the end of year 5, the total annual accruals for the account is $1,000 ($200 x 5). Unit A is then retired, which results in a reduction in the plant in service and accumulated depreciation of $1,000, consistent with established plant retirement procedure. At the start of year 6, Unit B remains in service with an accumulated depreciation balance of $0. At this point, one-third of Unit B's service life has expired, and its full original cost must still be recovered.

For the remaining 10 years, $100 ($1,000 x 10%) of annual expense is accumulated in depreciation, for a total of $1,000 when Unit B is retired. Thus, at the time of Unit B's retirement, the Company will have fully recovered the total depreciable cost of both units. However, at the end of year five, only one unit remained in service with two-thirds of its life expectancy left but with 100% of that unit's original investment still to be recovered. As a result, the ASL procedure is ineffective in matching cost recovery to the actual consumption of the asset. This is a characteristic deficiency of the ASL procedure.

When depreciation is determined using the ELG procedure, the pattern of cost recovery better matches actual consumption. Using the same two-unit example, the annual depreciation expense under the ELG procedure is calculated by summing the annual expense for each equal life group. In this case, there are two equal life groups – one for Unit A, which has a life of 5 years, and one for Unit B, which has a life of 15 years. The annual depreciation rate for Unit A is 20% (1/5)

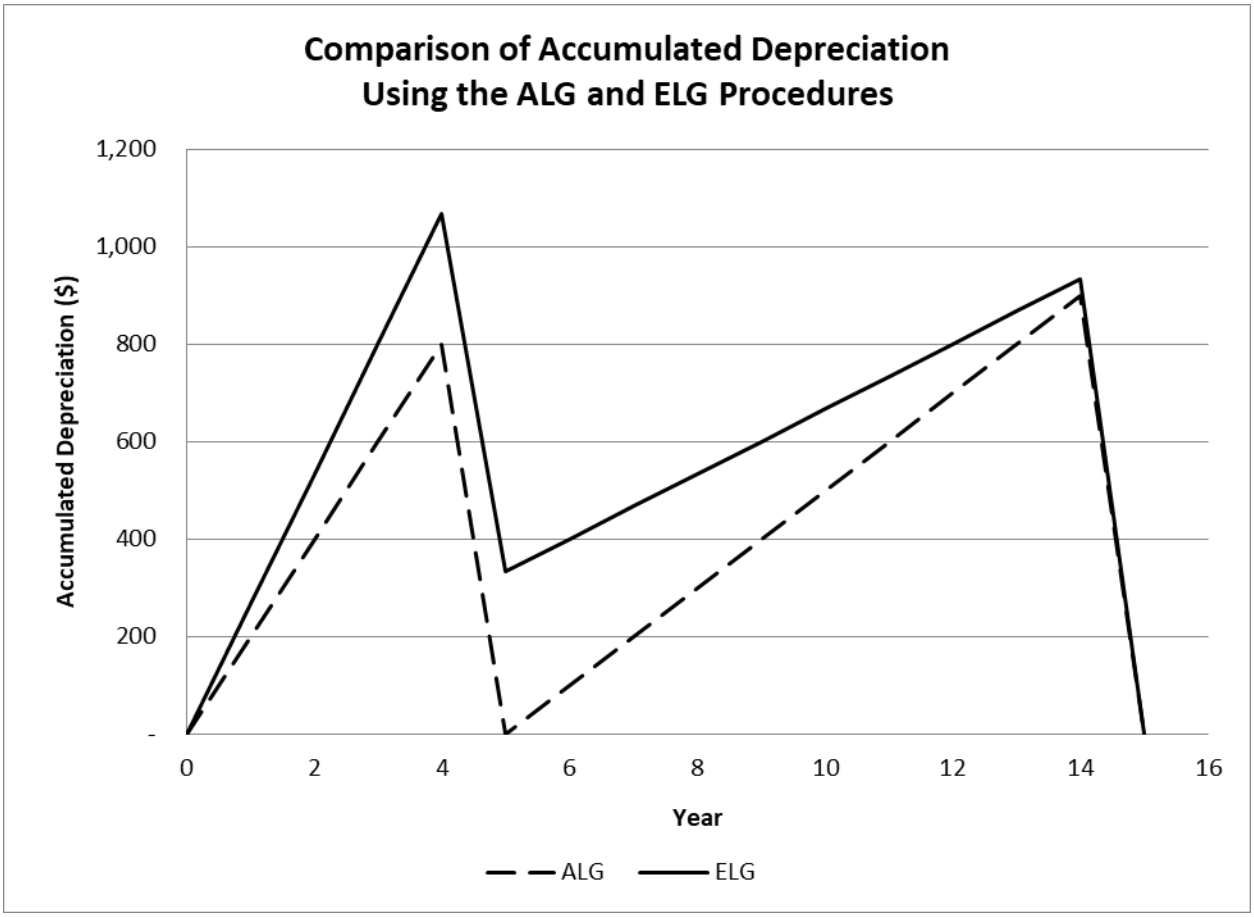
and for Unit B is 6.67% (1/15). Thus, the annual accruals for years 1 through 5 will be $200 ($1,000 x 20%) for the first equal life group (Unit A) summed with $66.67 ($1,000 x 6.67%) for the second (Unit B), or $266.67. At the end of year 5, when Unit A is retired, the total accruals would be $1,333.33 ($266.67 x 5). The retirement of Unit A results in a reduction of $1,000 in accumulated depreciation, and at the start of year 6, the $1,000 original cost of Unit B remains with $333.33 in accumulated depreciation. Thus, with one-third of Unit B's life consumed, accumulated depreciation is exactly one-third of the original cost for this unit.

In the years 6 through 15, the annual depreciation expense is $66.67 for a total of $666.67 over the 10-year period. After the retirement of Unit B, the accumulated depreciation is $0 ($1,000 of accruals less the $1,000 retirement of Unit B), and the full recovery of both units has been obtained.

As this example shows, the ELG procedure better matches the cost recovery of both units with their actual service lives. Figure 1 below provides a graph of the accumulated depreciation for both procedures. The end of year 5 provides the best illustration of the difference between the two procedures. Under the ELG procedure, Unit A is fully recovered when retired at the end of year 5; Unit B is one-third through its service life and has had one-third of its cost recovered. This contrasts with the ASL procedure, in which accumulated depreciation is $0 at the end of year 5, even though the only unit remaining in service has consumed one-third of its service life. Clearly, the ELG procedure provides a better match regarding the consumption of the service value for the two units. Additionally, rate

base under ELG at the end of year 5 is $667 (=$1,000-$333) versus $1,000 (=$1,000 - $0) under ASL.

Figure 1. Comparison of Accumulated Depreciation Using the ALG and ELG Procedures



Q. You have provided a simple two-unit example demonstrating how ELG works. Do the same principles apply to larger property groups with many units?

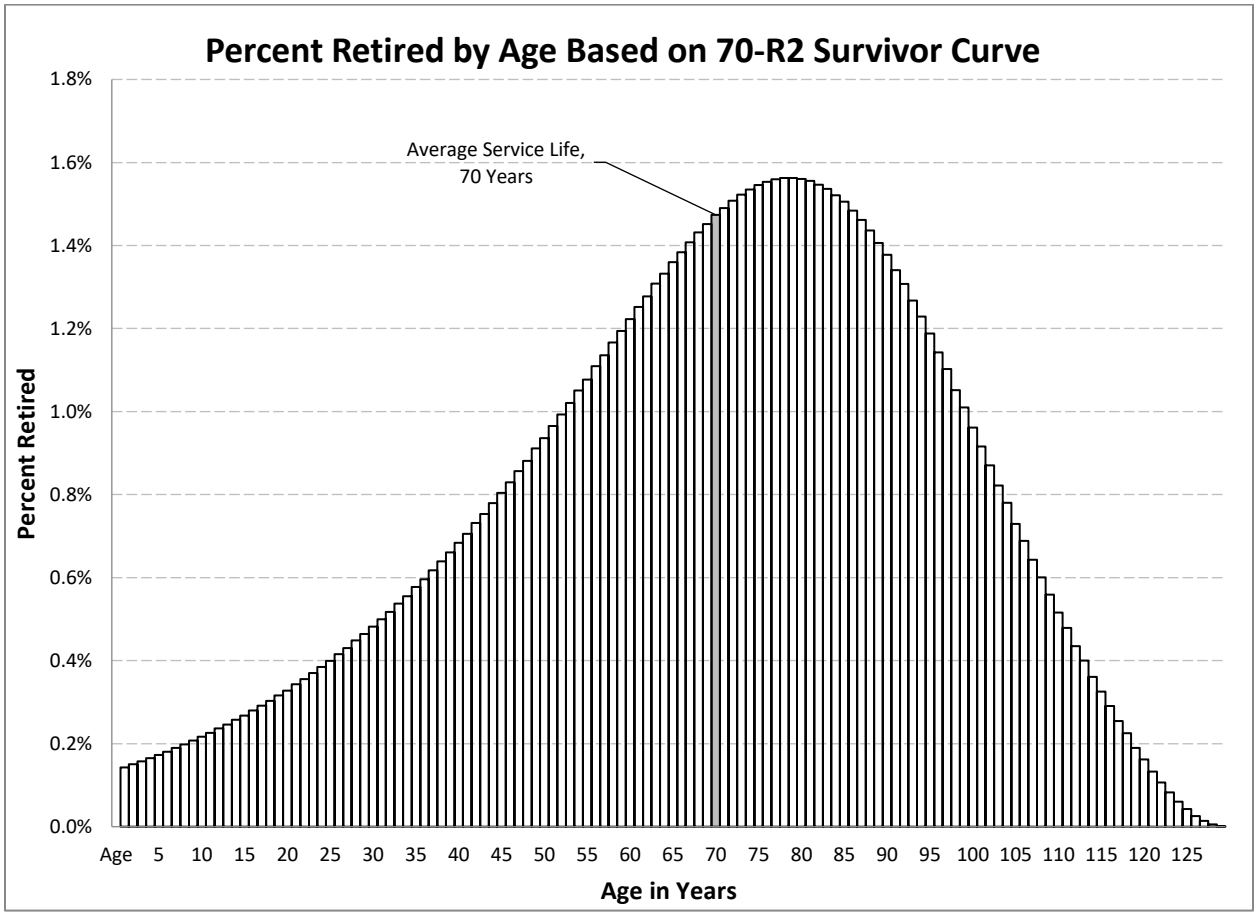
A. Yes. The same principles apply when the ELG procedure is applied to a large group of property with many units, as is typical of utility property. The survivor curve estimated for each property account can be used to divide an account into equal life groups. The survivor curve allows for the calculation of the percentage of the

property account that is in each equal life group, which allows for the calculation of ELG annual depreciation accruals for the entire property group. Under the ASL procedure, the depreciation expense for all property in the account is calculated based on the average service life for the entire group.

The ELG procedure recognizes the reality of dispersion. Specifically, it recognizes that in actual utility operations only a very small percentage of the account will be retired at the average service life. Figure 2 below is a chart of the frequency curve for the 70-R2 survivor curve. The frequency curve shows the percentage of property in this account that will be retired at each age, based on the estimated survivor curve. This percentage is also the size of each equal life group.

The shaded bar in Figure 2 represents the percentage of property that will have a life of 70 years. In other words, this shows the percentage of property that is expected to be in service for the average service life. Only 1.47% of the assets will be in service for exactly 70 years. In contrast, a majority, 98.53%, of the assets will have a service life different than 70 years.

Figure 2. Percent Retired by Age Based on 70-R2 Survivor Curve



The ELG procedure recognizes this dispersion and allocates costs for each equal life group over the expected life for that group. The service lives indicated by the 70-R2 survivor curves range from 1 year to 130 years. As a result, the ELG procedure allocates cost in a manner that approximates the result of each asset being depreciated over its actual life. Conversely, the ASL procedure depreciates every unit of property within an account over the same life, that is, the average life. As Figure 2 shows, this average life will be incorrect most of the time – in this example, the average life will be the wrong life for 98.53% of the individual assets.

Just as in the case for the two-unit example provided above, the ELG

procedure better matches capital recovery with the actual lives forecast by the estimated survivor curve.

III. PENNSYLVANIA PRECEDENT

Q. Is the ELG procedure supported by other depreciation authorities?

A. Yes. ELG is discussed and supported in authoritative depreciation texts and academic literature. As noted previously, Robley Winfrey, who developed the Iowa survivor curves that are universally used in estimating service lives based on historical retirement data, referred to the ELG procedure as "the only mathematically correct procedure." [4]

Q. Has the ELG procedure been previously adopted in Pennsylvania?

A. Yes. ELG is the predominant method used in Pennsylvania for many years. Most Pennsylvania gas, electric and water utilities have used the ELG procedure since the 1980s. ELG was adopted for National Fuel in the 1980s related to vintages from the previous rate case and has been used for depreciation since this approval.[5] Generally, every five years beginning in the mid-1980s, the Company has filed a service life study report with the Commission for approval based on Commission regulations. In 2023, National Fuel submitted its most recent five-year service life study report to the Commission and all depreciation parameters and methods, including the use of the ELG procedure, were approved. Additionally, National Fuel submits annual depreciation reports to the Commission each year updating

[4] Robley Winfrey, Depreciation of Group Properties, Bulletin 155 (Ames, IA: Iowa State University Press, 1942, reprinted 1969); p. 71

[5] ELG was adopted for many Pennsylvania utilities on a go-forward basis. For this reason, vintages of plant subsequent to the adoption of ELG use ELG while older vintages use ASL. For National Fuel, vintages 1982 and subsequent use ELG and vintages 1981 and prior use ASL

the Company's depreciation accrual rates for book purposes as well as identifying the underlying depreciation parameters and calculation methods and procedures used to determine depreciation expense. Under the Commission's regulation 52 Pa. Code §73.9(c), once such depreciation reports are filed and accepted "*[i]n subsequent ratemaking proceedings, the most recent annual depreciation report or service life study approved or deemed approved for accounting purposes only under this chapter, constitutes a rebuttable presumption as to the reasonableness of the accrued depreciation claimed for ratemaking purposes, and the burden of proving the unreasonableness of the accrued depreciation shall be on the challenging party*."

Q. Are the Company's current depreciation rates based on the ELG procedure?

A. Yes. The Company's most recent annual depreciation report was filed on March 31, 2026 and most recent service life study was filed in May 2023. All have been approved for accounting purposes using the ELG procedure. The ELG procedure was also adopted in the most recent rate case, Docket No. R-2022-3035730 for the appropriate vintages.

Q. Since the use of ELG is the predominant and longstanding practice in Pennsylvania, has Mr. Andrews provided evidentiary support for his recommendation that the Company should deviate from this practice?

A. No. None of Mr. Andrews' arguments support overturning longstanding precedent despite having the burden of doing so under 52 Pa. Code §73.9(c). He appears to

disagree with ELG simply because it can produce higher depreciation rates, but he provides no evidence for why lower depreciation rates are more appropriate.

Mr. Andrews has not supported his claim that the Company's approved depreciation rates or calculation procedures, which are based on longstanding precedent, are unreasonable. Further, Mr. Andrews ignores the issue of precedent, in effect only arguing that his proposal should be adopted because it results in lower depreciation expense and a short-term reduction in rates for current customers. He does not consider the other associated components of developing rates or why National Fuel should have considerably lower rates than other gas companies.

However, as I will explain, Mr. Andrews is incorrect that the longstanding use of ELG costs customers more than ASL. In fact, the opposite is true. Current customers benefit from the continued use of ELG, because rate base is lower than had ASL been used for this time. The more precise recovery through ELG benefits customers over time, because shorter-lived assets are correctly recovered over their useful lives, resulting in a lower rate base and lower return on rate base that exceeds the higher annual depreciation expense. Further, the alleged benefit proposed by Mr. Andrews, of lower short-term rates, is the result of the *change* in procedure, not from the procedure itself. Over time, the ASL depreciation rates will result in a higher rate base and higher overall cost to customers.

Q. Has the commission issued a recent ruling regarding the ELG vs. ALG?

A. Yes. In December of 2025, the Commission issued its Opinion and Order addressing ELG vs. ALG in Docket No. R-2025-3053499.

Q. Please provide the excerpt from the opinion and order in Docket No. R-2025-3053499 addressing the ELG vs. ALG issue.

A. In Docket No. R-2025-3053499, the Commission's Opinion and Order addressing ELG vs. ALG is reflected below.

> Based on our review of the record, the ALJs' Recommended Decision, the Exceptions to the Recommended Decision, and Replies thereto, we agree with the ALJs that the Company presented evidence outweighing the evidence presented by the OCA on this issue. Therefore, we find that the ALJs properly recommended that the Commission reject the OCA's proposal to adopt the ASL procedure in this proceeding. Accordingly, we shall deny the OCA's Exception No. 1.[6]

Q. WAS OCA WITNESS ANDREWS ALSO THE OCA WITNESS RELATED TO DEPRECIATION IN DOCKET NO. R-2025-3053499?

A. No, however, he was involved in Docket No. R-2024-3046519, which was the prior case for Columbia Gas which also used the ELG procedure. He is clearly aware of not only the precedent in Pennsylvania but also the many components of determining depreciation rates in this state jurisdiction which he ignores.

Q. Has OCA Witness Andrews offered any support for his ALG proposal in the instant case that was not provided in other cases recently in Pennsylvania?

A. No, he has not. In fact, his positions in this case clearly show he does not consider any of the factors that would properly recover depreciation expense under the guidance in this jurisdiction.

[6] Pa. PUC v. Columbia Gas of Pennsylvania, Inc., Docket No. R-2025-3053499 (Opinion and Order entered Dec. 9, 2025), p. 111.

IV. DEPRECIATION AND RATE BASE

Q. How does Mr. Andrews discuss the impact of ELG on customer rates?

A. Mr. Andrews states on page 23, lines 7 and 8 of his testimony "Utilities typically only update their depreciation expense recovered from customers in the context of a base rate case, which is often not an annual occurrence. When depreciation rates for new assets are proposed using the ELG procedure, the rates put forward for approval would be analogous to the year 1 depreciation rate in this example. Therefore, if the ELG method were approved in a depreciation study, given this example and left in place for 10 years, the effective depreciation rate would be 34.38% every year. To be just to consumers and to produce reasonable rates, ELG depreciation rates should be updated each year and the corresponding depreciation expense adjusted in base rates; however, the ELG depreciation rates are not properly implemented and create intergenerational inequities, significantly overcharging customers in base rates based on the higher depreciation rates in earlier years."

Q. Has National Fuel filed a recent rate case?

A. Yes. Including the instant rate case, National Fuel filed a rate case most recently in 2023.

Q. Is National Fuel required by Pennsylvania regulations to update its depreciation expense and annual depreciation accrual rates each year by filing an Annual Depreciation Report?

A. Yes.

Q. Do National Fuel's proposed ELG depreciation rates produce just and reasonable rates?"

A. Absolutely yes.

Q. Do depreciation rates based on the ELG procedure produce the most appropriate match of recovery of the assets within an account by the utilization of the assets in an account based on the survivor curve?

A. Absolutely yes.

Q. Please explain this concept further.

A. Depreciation impacts customer rates in two ways. Depreciation expense is a direct component of the revenue requirement; however, accumulated depreciation[7] is also a *reduction* to rate base. A higher level of accumulated depreciation results in a lower rate base, a lower return on rate base and, therefore, lower customer rates when compared to a lower level of accumulated depreciation.

The implication of Mr. Andrews' testimony is that a utility has an incentive for higher depreciation expense because it results in higher customer rates, and thus more cash flow for the Company. However, in the long term, his description of the rate impact is fundamentally incorrect. Higher depreciation expense will, over time, result in higher accumulated depreciation. Because average depreciation rates for a utility are typically in the 2% to 3% range and the return on rate base is higher (typically 7% to 8% or more), higher depreciation expense tends to produce lower customer rates over time. Mr. Andrews's suggestion that a

[7] Accumulated depreciation is the depreciation expense recorded to date, less recorded retirements and cost of removal, plus recorded gross salvage.

utility has an incentive to have higher rates for depreciation expense is simply incorrect and does not create an intergenerational inequity.

The longstanding use of ELG depreciation rates for Pennsylvania utilities has resulted in a lower rate base than if ASL had been used. Customers today pay lower customer rates than if ASL had been used during the years since ELG's adoption. As a result, it has been in customers' interest, not only to use ELG but also to use it consistently.

Over time ASL will result in higher customer rates than ELG. It is correct to assume that if the Company were to switch from ELG to ASL there would be a *short*-term benefit to current customers. However, this is not because ASL is in customers' best interest in the long term, but only because current customers would benefit from both lower ASL depreciation rates and from the lower rate base that exists due to the longstanding use of ELG.

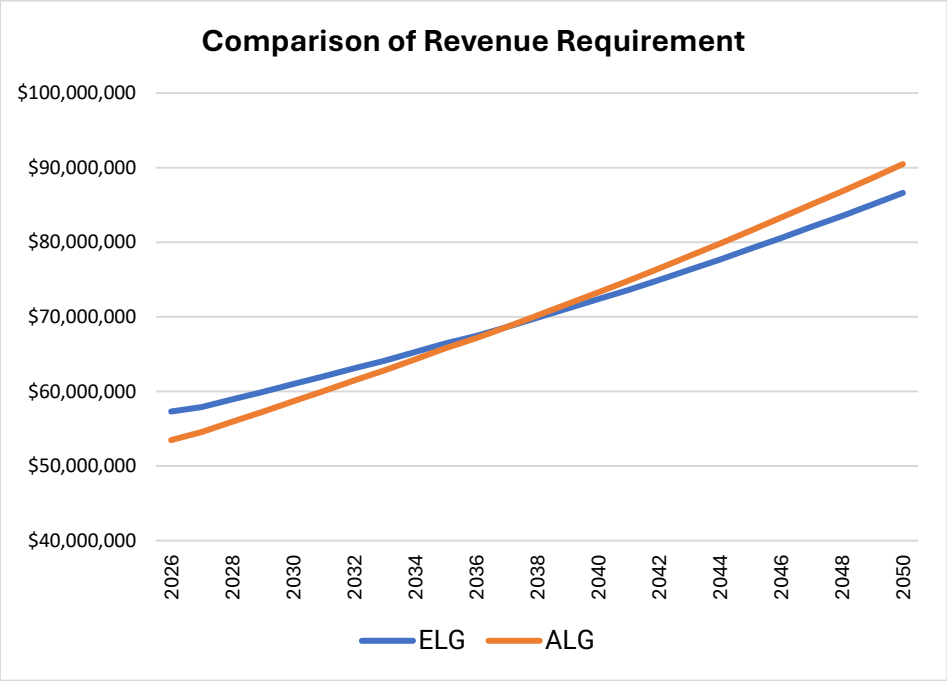
Mr. Andrews' proposal is therefore not a recommendation that is in the long-term interest of lower customer rates. It is instead a short-term subsidy only to current customers who benefit from ELG depreciation rates that were paid by a previous generation of customers. The costs of a higher rate base will be paid for by future customers who will have to pay higher overall customer rates. Adopting ALG would serve as an intergenerational subsidy to current customers at the expense of other generations of customers.

Q. Can you illustrate this concept?

A. Yes, this concept is illustrated in Exhibit No. JJS-R1, which forecasts plant and reserve balances for National Fuel through 2050 under two scenarios: one

adopting the ALG procedure and the other maintaining the currently-approved ELG procedure for vintages 1982 and newer. Figure 3 below shows a high-level estimate of the Company's revenue requirement for the period 2025 through 2050 under each of these scenarios. This demonstrates that while ELG leads to higher depreciation expenses in the short term, it results in lower revenue requirements over the long term. The ELG approach is more beneficial to customers as it provides more stable and lower rates over time.

Figure 3. Comparison of Revenue Requirement



V. INTERGENERATIONAL EQUITY

Q. Please explain the concept of "intergenerational equity."

A. Intergenerational equity is a ratemaking principle in which customers receiving the benefit from the use of an asset (e.g., from gas utility property used to provide gas service) are the same customers who pay for the cost of that asset - no more,

no less. There are two related concepts when considering intergenerational equity as it pertains to depreciation. The first is the inequity that results when customers pay for assets from which they receive no service. For example, if an asset is retired before becoming fully depreciated, then customers subsequent to the retirement will have to pay for an asset from which they are not receiving service. This is less equitable, as one generation of customers bears the cost of an asset from which they receive no service. Depreciation rates should be designed to avoid such an outcome. However, in real-world operations, circumstances can change such that assets are retired earlier than expected. This results in a situation that is different than designing depreciation rates to include intergenerational inequity, which should be avoided.

The second concept is related to the distribution of depreciation charges over the life of an asset. For example, if depreciation expense is higher in the earlier years of an asset's life and lower in later years (or vice versa), this also is less equitable because one generation of customers pays a higher share than the next.

In my professional opinion, the first concept related to intergenerational equity can be more detrimental to customers than the second. That is, there is greater inequity resulting from a customer paying for an asset from which they received no service than the inequity resulting from one generation paying a somewhat different share of the same asset than another generation.

Q. How does the ELG procedure calculate depreciation expense?

A. The ELG procedure calculates depreciation expense for assets with like lives within a depreciable group in accordance with the Iowa Survivor Curve proposed for the

account and summing that depreciation expense for each similar life group of assets to develop an annual depreciation accrual rate applicable to the depreciable group. This procedure is designed to more appropriately match the recovery of the assets' costs to the period of time over which they are providing service to rate payers.

Q. How does the ALG procedure calculate depreciation expense?

A. The ALG procedure calculates depreciation expense by applying the same average service life from the proposed Iowa Survivor Curve to all assets within a depreciable group rather than grouping assets within a depreciable group by like lives. The ALG procedure operates with the assumption that some of the assets within a depreciable group will retire prior to the average service life applied to the depreciable group and other assets will survive longer than the average service life applied to the depreciable group. Continuing, the ALG procedure assumes the over-recovery of the assets surviving longer than the average service life will offset the amount of the under-recovery of the assets retiring prior to reaching the average service life of the depreciable group.

Q. Does the use of ELG vs. ALG or vice versa impact the total amount of asset cost to be recovered?

A. No. Both procedures are designed to recover the total service value of an asset over the asset's service life.

Q. Has Mr. Andrews claimed that the ELG procedure produces intergenerational inequity?

A. Yes.[8]

Q. Why does Mr. Andrews make that claim?

A. Given the precise nature of the calculation process utilized in the ELG procedure, the level of depreciation expense associated with assets that are younger than the proposed average service life is higher than depreciation expense using the ALG procedure. Conversely, as the assets mature and the lives grow longer, the level of depreciation expense associated with assets that are older than the proposed average service life is lower than depreciation expense using the ALG procedure. Mr. Andrews' claim focuses on the higher level of depreciation expense calculated for younger assets while disregarding the associated lower level of depreciation expense calculated associated with the older, more mature assets within the depreciable group. Mr. Andrews' claim misrepresents this more accurate allocation of depreciation expense as intergenerational inequity.

Q. Does the use of the ELG procedure produce Intergenerational Inequity?

A. No, quite the opposite. The very nature of the ELG procedure more precisely calculates depreciation expense for assets with like lives within a depreciable group and sums that expense to develop an annual depreciation accrual rate applicable to the depreciable group. As a result, it more appropriately matches the recovery

[8] Andrews, pp. 24-25, lines 4-11 and 1-2

of the asset's cost to the period of time over which it is providing service to rate payers.

In contrast, there is a stronger argument that the ASL procedure results in intergenerational inequity. Because depreciation expense on shorter-lived assets occurs over the average service life, recovery for these assets is deferred. ELG produces a more equitable recovery by recovering these costs over the actual, shorter, service lives.

Q. Does the use of the ELG procedure require the calculation of annual depreciation rates to be updated more frequently than the ALG procedure to prevent intergenerational inequity?

A. No. Regardless of the procedure selected, the calculation of depreciation expense and annual depreciation accrual rates should be updated regularly to prevent intergenerational inequity and the inherent variable of plant activity.

Q. How frequently does Pennsylvania regulation require the calculation of depreciation rates?

A. Pennsylvania regulation requires utilities operating within the state to calculate and file updated depreciation rates annually. This annual requirement alleviates concern for the development of generational inequity.[9]

[9] Bulletin 155, p. 71

VI. ALL FACTORS FOR DETERMING DEPRECIATION RATES

Q. Has Mr. Andrews considered all the key components for determining depreciation rates?

A. Absolutely not. He clearly ignores all the key factors of developing a depreciation rate in order to emphasize only one factor, which is completely improper.

Q. Please explain all of the factors that affect the development of a depreciation rate.

A. Depreciation rates are determined on many factors or key components that each affect the depreciation rate that should be used to properly recover the full service value of all assets by account. Additionally, this should be done in a systematic and rational manner. The first two key components are the service life and net salvage percentage. The service life estimate is represented by the survivor curve. The net salvage component is typically a percentage of cost of removal minus gross salvage that are applied to the accrual rate in order to recover the full service value over the life of the asset. Pennsylvania is unique to all other states in that the net salvage component is a five year amortization of the incurred costs after the asset is retired. Thus, a deferral. Second, is the depreciation procedure and method. Procedures are ALG vs ELG and the method is either remaining life or whole life. The next component to focus on is the plant to reserve ratio at the test year dates. Finally, the age of the surviving plant at the test year dates. Each of these factors has an impact on the depreciation rate, it is not just the depreciation procedure. Additionally, you must consider all of these factors when comparing to other utilities within the same state as well as those in other state jurisdictions.

Q. Has Mr. Andrews considered all of these factors in developing his testimony?

A. Disturbingly not. He clearly ignores the special handling of the net salvage recovery deferral in Pennsylvania. He does not consider the remaining life versus whole life component nor does he consider how close the theoretical reserve to book reserve variance is, which clearly shows the recovery of many years has been fair and reasonable based on the factors in place and the expected plant investment that has taken place over the past and forecasted into the future.

Q. Is Mr. Andrews selective in which depreciation factors he wants to follow when conducting his depreciation calculations?

A. Yes. He attempts to compare the depreciation procedure across other jurisdictions but none of the other factors when considering how depreciation rates are determined within each jurisdiction.

Q. Mr. Andrews continually discusses ELG as an accelerated procedure and in a high investment period depreciation rates would be getting higher?

A. However, he does not address that fact that from the historic test year to the fully projected future test year using the ELG procedure the composite rate goes down.

Q. Has Mr. Andrews provided decisions regarding ELG procedure from other jurisdictions to support his proposed use of the ALG procedure?

A. Yes. Mr. Andrews cites decisions from Indiana and Kentucky to support his proposal of the ALG procedure in this case.

Q. Why are the Indiana and Kentucky decisions not applicable to the instant case?

A. Both the decisions referenced by Mr. Andrews were cases involving electric utilities with an asset base including electric generation, transmission and distribution assets which are significantly different assets involving significantly different costs associated with them and more importantly assets that are being recovered over much shorter remaining lives than originally planned.

Q. Was the Indiana decision referenced in Mr. Andrews' direct testimony based on a "higher than average investment cycle"?

A. Yes. I have provided an excerpt from the Indiana decision referenced by Mr. Andrews below citing to both "a changed landscape" and "a higher than average investment cycle" as the basis of the Indiana Utility Regulatory Commission decision.

> While we have determined in the past that the ELG methodology was appropriate and acknowledge the weight given to precedent in many prior decisions, we always evaluate each case as it comes before us and do not need to approve the same methodology based on prior decisions, especially in light of a changed landscape. The use of ELG in a higher than average investment cycle has the effect of unnecessarily increasing the near term depreciation expense as compared to the use of ALG.[10]

Q. Does "a changed landscape" exist for National Fuel?

A. No. National Fuel is operating within the same "landscape" that has existed for many rate cases. The ELG procedure has been proposed and approved in each of those rate cases.

[10] Final Order, Cause No. 45253, p. 90

Q. Is National Fuel experiencing "a higher than average investment cycle"?

A. Yes, but not to the same degree as was discussed in the Indiana case. The increased investment relates to the continuation of projects that have been in place for quite some time, however, the cost of materials is much higher. The majority of the work being done in recent years for National Fuel is the replacement of low pressure pipe to intermediate pressure pipe that is affecting many gas utilities in the mid-Atlantic and northeast regions. I would not consider National Fuel's service territory to be a high growth area that is really the driver for the higher than average investment cycle that is referenced in Mr. Andrews testimony. Given the level of retirement dollars have not increased much in the past few years and with what was forecasted it is clear the increase is due to the replacement of the older pipe. Once again, if Mr. Andrews studied the details of the data he would see that the plant investment plan that National Fuel is following is consistent with others in the area. None of this is the result of the ELG procedure.

Q. Is the Company's proposed 2.45% composite depreciation rate calculated using the ELG procedure as of October 31, 2027 reasonable and consistent with comparable gas distribution utilities in the United States?

A. Yes. In fact, in reviewing the composite depreciation rate utilized by various other gas distribution utilities one can see the average exceeds 2.45%. The attached Exhibit No. JJS-R2 sets forth composite depreciation rates of comparable gas distribution utilities from recent rate cases.

Q. Is the proposed 1.96% composite depreciation rate calculated by Mr. Andrews using the ALG procedure as of October 31, 2027 reasonable and consistent with other gas distribution utilities in the United States?

A. No, the 1.96% composite depreciation rate proposed by Mr. Andrews is unreasonably low and inconsistent with other gas distribution utilities in the industry. In fact, Mr. Andrews recognizes it is low in his testimony on page 36, but he justifies it by saying net salvage in Pennsylvania is the cause. This statement just emphasizes Mr. Andrews' disregard for all the components of developing a fair rate of utilities in Pennsylvania. Including a net salvage accrual like other jurisdictions would significantly increase the annual depreciation rate. Additionally, the Company has been properly conducting annual depreciation updates per regulations which confirm a consistent recovery pattern for the asset utilization.

Q. Can you further comment on how the 1.96% composite depreciation rate suggested by Mr. Andrews is not reasonable?

A. Yes. Mr. Andrews twice in his testimony (pages 17 and 30) attempts to compare National Fuel's results in this case with the National Fuel New York property. He attempts to say Pennsylvania should follow the New York depreciation procedures because Pennsylvania has accelerated rates, however, when comparing the National Fuel Pennsylvania Division composite rate of 2.45% that I calculate or the 1.96% composite rate that he calculates he does not justify why National Fuel New York has a higher composite rate which is over 3.0%. Mr. Andrews clearly ignores

all the important factors that determine a depreciation rate along with fair and reasonable recovery for National Fuel in this case.

Q. Does this complete your Prepared Rebuttal Testimony?

A. Yes, it does.

NATIONAL FUEL EXHIBIT JJS-R1

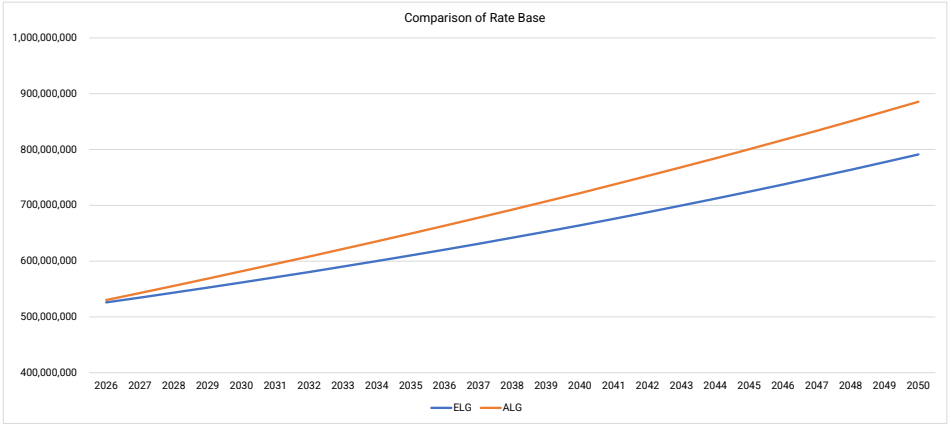
NATIONAL FUEL GAS DISTRIBUTION CORPORATION - PENNSYLVANIA DIVISON

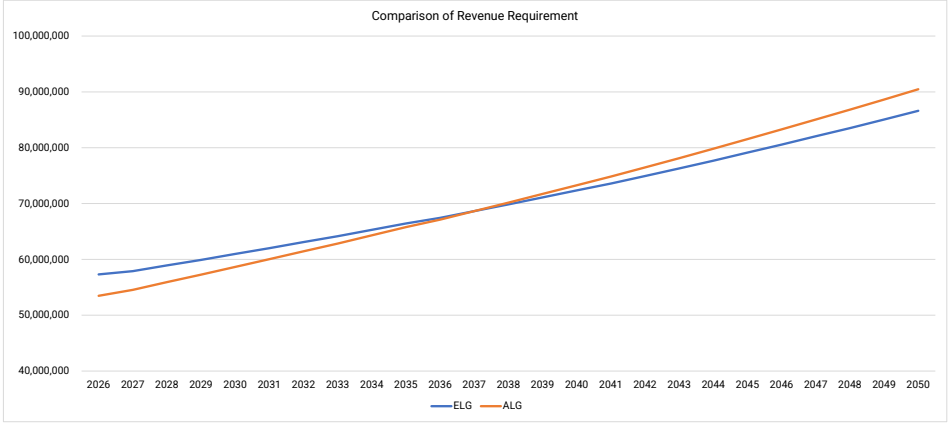
Assumptions

0 *Future Net Salvage*

8.0% *Rate of Return*

		EQUAL LIFE GROUP								AVERAGE LIFE GROUP									
TEST YEAR	AVERAGE ORIGINAL COST	BOOK RESERVE	COMPOSITE REMAINING LIFE	FUTURE ACCRUALS	EXPENSE	RATE	RETURN	REVENUE REQUIREMENT	RATE BASE	BOOK RESERVE	COMPOSITE REMAINING LIFE	FUTURE ACCRUALS	EXPENSE	RATE	RETURN	REVENUE REQUIREMENT	RATE BASE	RETIREMENTS	NET SALVAGE
2025	799,982,219	282,645,393	34.0	517,336,826						282,645,393	46.8	517,336,826							
2026	792,687,535	266,572,828	34.8	526,114,707	15,221,586	1.92	42,089,177	57,310,763	526,114,707	262,408,640	47.7	530,278,895	11,057,398	1.39	42,422,312	53,479,710	530,278,895	31,294,150	-
2027	808,909,959	274,132,197	34.6	534,777,762	15,117,571	1.87	42,782,221	57,899,792	534,777,762	265,960,320	47.4	542,949,639	11,109,882	1.37	43,435,971	54,545,853	542,949,639	7,558,202	-
2028	823,213,772	279,611,143	34.6	543,602,629	15,434,549	1.87	43,488,210	58,922,759	543,602,629	267,463,161	47.2	555,750,611	11,458,443	1.39	44,460,049	55,918,492	555,750,611	9,955,603	-
2029	840,306,526	287,712,142	34.5	552,594,384	15,704,658	1.87	44,207,551	59,912,209	552,594,384	271,628,293	46.9	568,678,233	11,768,792	1.40	45,494,259	57,263,051	568,678,233	7,603,659	-
2030	855,199,344	293,431,499	34.4	561,767,845	16,035,734	1.88	44,941,428	60,977,162	561,767,845	273,434,418	46.7	581,764,927	12,122,502	1.42	46,541,194	58,663,696	581,764,927	10,316,377	-
2031	872,711,938	301,623,087	34.3	571,088,851	16,323,904	1.87	45,687,108	62,011,012	571,088,851	277,746,583	46.5	594,965,355	12,444,481	1.43	47,597,228	60,041,709	594,965,355	8,132,316	-
2032	887,523,934	306,922,391	34.3	580,601,543	16,647,607	1.88	46,448,123	63,095,730	580,601,543	279,190,364	46.5	608,333,570	12,792,084	1.44	48,666,686	61,458,770	608,333,570	11,348,303	-
2033	905,729,289	315,420,781	34.2	590,308,508	16,918,753	1.87	47,224,681	64,143,434	590,308,508	283,866,451	46.2	621,862,838	13,096,450	1.45	49,749,027	62,845,477	621,862,838	8,420,363	-
2034	924,640,464	324,426,553	34.0	600,213,910	17,266,476	1.87	48,017,113	65,283,589	600,213,910	289,065,659	45.9	635,574,805	13,459,912	1.46	50,845,984	64,305,896	635,574,805	8,260,703	-
2035	938,863,275	328,660,967	34.3	610,202,308	17,627,712	1.88	48,816,185	66,443,897	610,202,308	289,506,339	46.2	649,356,936	13,833,978	1.47	51,948,555	65,782,533	649,356,936	13,393,299	-
2036	957,784,159	337,209,853	34.2	620,574,306	17,793,900	1.86	49,645,944	67,439,844	620,574,306	294,318,780	46.0	663,465,379	14,057,455	1.47	53,077,230	67,134,685	663,465,379	9,245,014	-
2037	977,014,615	345,875,802	34.1	631,138,813	18,151,868	1.86	50,491,105	68,642,973	631,138,813	299,260,087	45.8	677,754,527	14,427,227	1.48	54,220,362	68,647,589	677,754,527	9,485,920	-
2038	997,275,189	355,320,450	34.0	641,954,739	18,494,512	1.85	51,356,379	69,850,891	641,954,739	304,994,180	45.6	692,281,009	14,783,956	1.48	55,382,481	70,166,437	692,281,009	9,049,864	-
2039	1,016,637,270	363,676,874	34.0	652,960,396	18,878,909	1.86	52,236,832	71,115,741	652,960,396	309,644,718	45.6	706,992,553	15,173,023	1.49	56,559,404	71,732,427	706,992,553	10,522,486	-
2040	1,036,494,526	372,267,764	34.0	664,226,762	19,209,184	1.85	53,138,141	72,347,325	664,226,762	314,546,819	45.5	721,947,707	15,520,395	1.50	57,755,817	73,276,212	721,947,707	10,618,294	-
2041	1,057,795,462	382,003,584	33.9	675,791,879	19,529,719	1.85	54,063,350	73,593,069	675,791,879	320,618,322	45.3	737,177,140	15,865,403	1.50	58,974,171	74,839,574	737,177,140	9,793,900	-
2042	1,079,175,102	391,576,723	33.8	687,598,378	19,927,364	1.85	55,007,870	74,935,234	687,598,378	326,527,990	45.2	752,647,112	16,263,892	1.51	60,211,769	76,475,661	752,647,112	10,354,225	-
2043	1,101,207,863	401,552,800	33.8	699,655,063	20,318,569	1.85	55,972,405	76,290,974	699,655,063	332,845,806	45.0	768,362,057	16,660,307	1.51	61,468,965	78,129,272	768,362,057	10,342,492	-
2044	1,123,593,432	411,627,126	33.6	711,966,307	20,724,992	1.84	56,957,305	77,682,297	711,966,307	339,263,619	44.8	784,329,813	17,068,480	1.52	62,746,385	79,814,865	784,329,813	10,650,666	-
2045	1,146,293,657	421,783,364	33.6	724,510,293	21,163,817	1.85	57,960,823	79,124,640	724,510,293	345,753,490	44.7	800,540,167	17,497,449	1.53	64,043,213	81,540,662	800,540,167	11,007,579	-
2046	1,169,506,702	432,191,121	33.5	737,315,581	21,583,522	1.85	58,985,246	80,568,768	737,315,581	352,493,712	44.5	817,012,990	17,915,987	1.53	65,361,039	83,277,026	817,012,990	11,175,765	-
2047	1,191,655,050	441,274,191	33.5	750,380,859	22,019,922	1.85	60,030,469	82,050,391	750,380,859	357,900,652	44.5	833,754,398	18,343,793	1.54	66,700,352	85,044,145	833,754,398	12,936,853	-
2048	1,215,371,872	451,664,406	33.4	763,707,467	22,423,044	1.84	61,096,597	83,519,641	763,707,467	364,616,235	44.4	850,755,637	18,748,412	1.54	68,060,451	86,808,863	850,755,637	12,032,829	-
2049	1,239,791,958	462,484,950	33.3	777,307,008	22,861,615	1.84	62,184,561	85,046,176	777,307,008	371,755,088	44.2	868,036,870	19,179,924	1.55	69,442,950	88,622,874	868,036,870	12,041,070	-
2050	1,263,996,763	472,815,464	33.3	791,181,299	23,319,468	1.84	63,294,504	86,613,972	791,181,299	378,390,303	44.2	885,606,460	19,624,168	1.55	70,848,517	90,472,685	885,606,460	12,988,954	-
					468,698,956		***1,296,123,328***						***374,273,795***		***1,396,014,371***				





NATIONAL FUEL EXHIBIT JJS-R2

COMPOSITE DEPRECIATION RATES
OF GAS DISTRIBUTION UTILITIES

COMPANY	COMPOSITE DEPRECIATION RATE
COMPANY 01	2.88
COMPANY 02	2.63
COMPANY 03	2.35
COMPANY 04	2.40
COMPANY 05	2.61
COMPANY 06	3.05
COMPANY 07	2.68
COMPANY 08	2.63
COMPANY 09	2.81
COMPANY 10	2.49
COMPANY 11	3.16
COMPANY 12	2.56
COMPANY 13	3.06
COMPANY 14	2.37
COMPANY 15	2.85
COMPANY 16	3.15
AVERAGE	**2.73**

NATIONAL FUEL STATEMENT NO. 9

MARK C. SCHAEFER

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 9

Direct Testimony of Mark C. Schaefer

Topics Addressed: **Capital Budget**
Leak Prone Pipe Replacement Program

Dated: January 28, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Mark C. Schaefer. My business address is 1100 State Street, Erie Pennsylvania 16501.

Q. By whom and in what capacity are you employed?

A. I am employed by National Fuel Gas Distribution Corporation, ("NFGDC") as an Assistant General Manager with responsibility in the Engineering Services department.

Q. Please provide your educational background.

A. In 1995, I graduated from Oregon State University with a Bachelor of Science degree in Civil Engineering.

Q. Please provide your professional experience.

A. I began my career in 1996 working as an Engineering Technician for the City of Hillsboro Engineering Services Department in Hillsboro, Oregon. From 1999 through 2003, I worked for WRG Design, a civil engineering consulting firm in Portland, Oregon as a Project Engineer/Project Manager responsible for designing civil engineering related private and public infrastructure improvement projects. In December 2003, I began my career in the gas industry with Northwest Natural, a local natural gas distribution company based in Portland, Oregon, where I was employed as a Project Engineer/Project Manager designing and coordinating multiple gas distribution and transmission capital pipeline and facility improvement projects until December of 2013. In December 2013, I

relocated to Erie, Pennsylvania and began employment as a Senior Engineer in the Engineering Services department of NFGDC's Pennsylvania Division ("National Fuel" or "Company"), supervising the Pennsylvania district engineering group. In summer 2018, my role expanded to include supervision of both the Pennsylvania and New York district engineering groups within our Engineering Services department. In February 2021, I was promoted to Assistant General Manager. I am also a registered Professional Engineer in the Commonwealth of Pennsylvania.

Q. What are your responsibilities in your current position?

A. I currently supervise and manage our Measurement, Regulation and Odorization ("MRO") group and our Technical Materials groups as well as support our Technical Training and Engineering Development Programs. In addition, I am also responsible for tracking and supporting our annual NFGDC Capital Budget and leak prone pipe ("LPP") Replacement Program.

Q. Have you previously testified in other proceedings before the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission") or any other state or federal agency?

A. Yes. I provided direct testimony on behalf of National Fuel under Docket No. R-2022-3035730 for the Company's last base rate case. I have also testified before the New York Public Service Commission in Case 23-G-0627.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your testimony.

A. I will provide testimony in support of the Company's capital budget and proposed accelerated LPP Replacement Program.

III. CAPITAL BUDGET

Q. Please explain the Company's capital plant additions related to distribution and transmission plant.

A. The Company has increased its capital expenditures related to distribution and transmission plant since 2023, with an actual spend from 2023 to 2025 of $129.5 million for replacement of mains, services and measurement and regulation stations. As referenced in Table 13 of the Company's December 11th, 2025, Amended Long Term Infrastructure Improvement Plan ("LTIIP") filing the Company plans to continue to increase spending in 2026 and 2027, with a planned total spending of approximately $253.4 million over the 5-year period as seen in Table 1 below.

Table 1: Actual & Projected Annual Capital Expenditures Related to Modernization

Fiscal Year	CapEx ($MM)	Actual / Budget
2023	$37.2	Actual
2024	$48.5	Actual
2025	$43.8	Actual
2026	$57.4	Budget
2027	$66.5	Budget
Total	$253.4	

This is an increase of approximately 113% in this area over the actual total spending from 2017 to 2021 of $118.9 million as seen in Table 2 below.

Table 2: Capital Expenditures Related to Modernization (2017-2021)

Fiscal Year	Capital Expenditures	
	Budget ($MM)	Actual ($MM)
2017	$20.0	$19.8
2018	$22.2	$20.5
2019	$24.1	$25.2
2020	$26.4	$24.8
2021	$25.7	$28.7
Total	$118.4	$118.9

Q. How does the Company's actual capital spending compare to the budget?

A. As seen in Table 2 above, from 2017 to 2021, the Company achieved its budget targets within 0.5% and from 2022 to 2025, the Company achieved its budget targets within 1.5% as seen in Table 3 below.

Table 3: Annual Capital Expenditures Related to Modernization (2022-2025)

Fiscal Year	Capital Expenditures	
	Budget ($MM)	Actual ($MM)
2022	$25.3	$21.7
2023	$33.8	$37.2
2024	$44.0	$48.5
2025	$46.0	$43.8
Total	$149.1	$151.2

Q. Why did the Company file an Amended LTIIP in December 2025?

A. As seen in Table 4 below, the Company is projecting an increase in the five-year total estimated cost of the LTIIP of 30% from the existing LTIIP projection. This increase is due to higher LPP replacement costs. The Commission's regulations require a utility to

file for a major modification to its LTIIP if the total estimated cost of the LTIIP increase by more than 20%.

Table 4: Amended LTIIP Expenditure Projections (2023-2027)

Year	LTIIP ($MM)	Amended LTIIP ($MM)	Increase ($MM)	Percentage Increase
2023	$34.1	$37.2	$3.1	9%
2024	$37.9	$48.5	$10.6	28%
2025	$38.7	$43.8	$5.1	13%
2026	$39.1	$57.4	$18.3	47%
2027	$45.8	$66.5	$20.7	45%
Total	$195.6	$253.3	$57.7	30%

Q. What are the reasons for the increased LPP replacement costs?

A. The increase in costs is primarily attributed to increases in the average cost per LPP replacement mile for many reasons, including by not limited to increases in restoration costs, material costs, contractor costs, permitting costs and overall inflationary increases from the COVID pandemic.

Q. How much has the average cost per LPP replacement mile increased?

A. As described in the Amended LTIIP, the average cost per mile has increased over 30% for Distribution LPP from an average cost per LPP mile between 2019 and 2022 of $460,000 to a cost per LPP mile of $627,000 in 2024 as seen in Figure 1 below. In addition, the average cost per diameter-inch mile for transmission and high-pressure steel pipeline replacements have increased by over 70% from an average cost per diameter-inch mile between 2019 and 2021 of approximately $170,000 to a cost per diameter-inch mile of approximately $295,000 in 2024 as seen in Figure 2 below.

Figure 1: Distribution Costs per LPP mile (2019-2024)

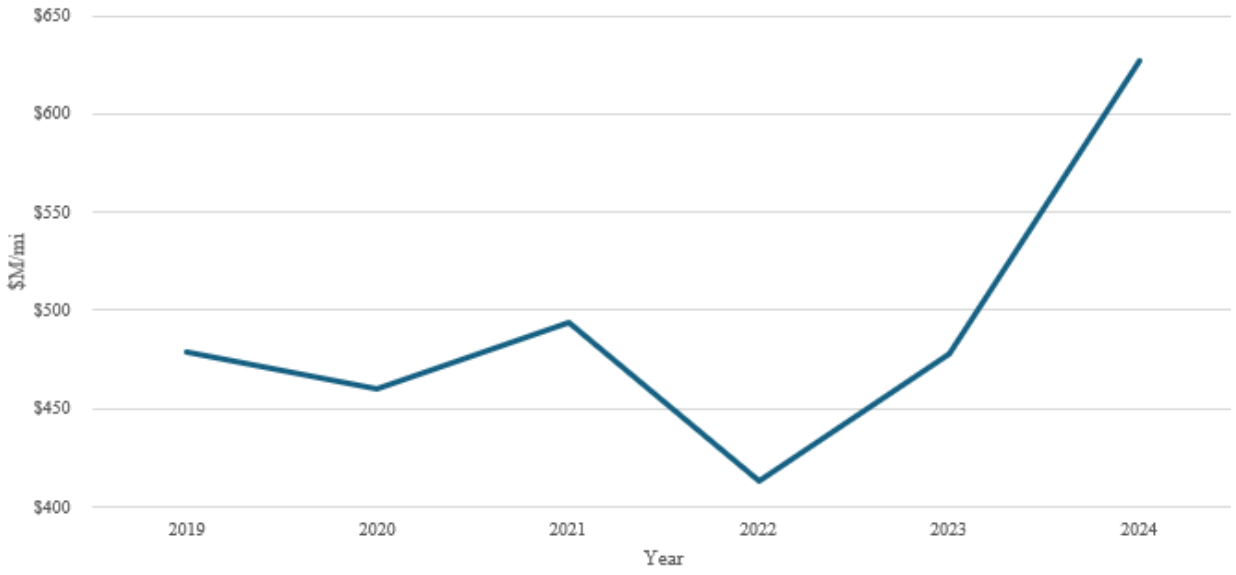
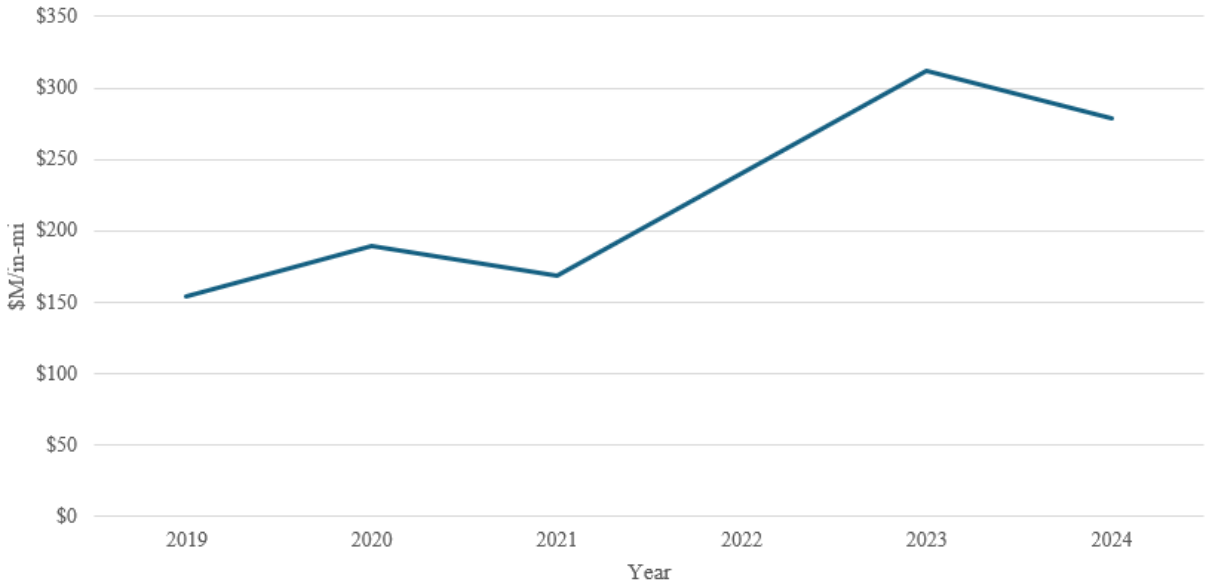


Figure 2: Transmission & HP Steel Distribution Steel Replacement Costs (2019-2024)



Q. What types of pipe material are included in the Company's LPP Replacement Program?

A. The Company has included bare steel, wrought iron and historic plastics that have exhibited or may be prone to leakage, in its LPP Replacement Program.

Q. Please describe The Company's LPP Replacement Program

A. The Company has made significant progress in the effort to replace LPP through our Systematic Replacement Program. This annual program prioritizes pipeline replacements on a system-wide basis using a comprehensive planning process through our Geographic Information System ("GIS") and our Distribution Probabilistic Risk Model. The Systematic Replacement Program is designed to identify and prioritize LPP replacement projects to reduce risk, control leak rates on LPP and increase the overall system reliability of our distribution system. As seen in Table 5 below, from calendar year end 2016 through 2024, the Company has eliminated 371 miles or 31% of its leak prone bare steel and wrought iron pipelines and 7,337 or 34% of its bare steel services.

Table 5: Bare Steel and Wrought Iron Mileage & Bare Steel Services (2016-2024)

Bare Steel & Wrought Iron Mileage & Bare Steel Services (2016-2024)		
Year	CY End Mainline Miles	CY End Bare Steel Services
2016	1,183	21,452
2017	1,103 [2]	20,441
2018	1,065	19,518
2019	1,028	18,581
2020	978	17,758
2021	960	16,871
2022	913	16,058
2023	863	15,096
2024	812	14,115

Based on PHMSA annual DOT reporting

[2] Adjusted for 41.594 miles corrected during 2018 records review; Pipe classified as bare but identified as coated.

Q. Please describe how the Company identifies LPP projects under its Systematic Replacement Program.

A. The Systematic Replacement process begins each fall, at the conclusion of the annual leak survey cycle. The Company utilizes GIS to perform a geographic leak analysis to identify areas of concentrated leakage. Our Engineering and Operations management then review areas of higher priority during our semi-annual planning meetings at each operating location. Public safety is of primary importance when considering pipeline replacement projects. During the planning process we utilize our Distribution Probabilistic Risk Model along with reviewing areas of system reliability concerns, active corrosion, and customer interruptions as well as potential conflicts with proposed highway and municipal public improvement projects through the Company's municipal outreach program. The result of the Systematic Replacement review includes three types of projects including smaller scope projects typically completed by Company construction crews, mid-sized projects completed by our contractor blanket construction crews and larger individual projects that are also competitively bid to a pool of qualified contractors.

Q. Please describe the Company's municipal outreach program.

A. Each spring the Company's highway utility coordinator mails out letters to municipalities within the Company's service territory requesting information on upcoming highway and municipal infrastructure improvement projects planned within the jurisdiction. The requested information includes copies of construction designs, anticipated scopes, and estimated start dates. The goal is to identify conflicts and coordinate LPP and other gas

facilities replacement projects with municipal projects to optimize efficiencies by relocating our facilities in advance of construction. When projects do not involve a direct conflict, the Company may be able to avoid future pavement cuts by replacing LPP prior to repaving. This outreach also provides an opportunity for the Company to review public improvement designs, identify conflicts, and attempt to coordinate with the municipality to potentially avoid or minimize relocating non leak prone pipe facilities through design changes.

IV. SYSTEM RELIABILITY AND SAFETY

Q. How does the Company incorporate elements of its Distribution Integrity Management Program ("DIMP") Plan and Transmission Integrity Management Plan ("TIMP") into its pipeline replacement and facility program?

A. Many DIMP and TIMP elements and programs are considered during pipeline replacement project planning, including the Company's Systematic Replacement Program discussed above. Both DIMP and TIMP Plans at the Company have System Reliability Reporting ("SRR") programs, which are used to identify operational problems on pipelines and metering and regulation stations. They are used specifically to evaluate threats to facilities in the categories of natural force damage (primarily washouts and exposures), equipment failure, other outside force damage, incorrect operation, and other causes. When an abnormal operating condition is discovered, an SRR is issued and tracked until the condition is remediated, often resulting in replacement of the facility. System Reliability Reports are tracked as part of the Company's DIMP performance measure process and are discussed at yearly spring and fall meetings with appropriate

Company personnel. Additionally, Engineering investigates plastic system leaks and reports of visually unacceptable fusions or non-pullout resistant couplings through its plastic system integrity program. This program includes accelerated actions that are prescribed based on the likelihood and potential consequences of a future leak. Remediation of fusion leaks and visually unacceptable fusions or non-pullout resistant couplings includes a review of as-built records to determine the number and possible locations of fusions on the project. Aerial photography is reviewed to determine the proximity of buildings. Based on the records review and the number of fusions on the job, additional fusion or coupling inspections or removal of known remaining fusions or couplings may be directed. Based on inspection results, replacement may be required.

Q. What existing plastic pipeline materials are within the Company's operating system?

The Company's existing plastic pipeline is comprised of a combination of Medium-Density Polyethylene ("MDPE"), High-Density Polyethylene ("HDPE") and unknown vintages. Table 6 below lists pipeline vintage as of October 1st, 2025.

Table 6: Plastic Pipeline by Vintage as of October 1st, 2025

Vintage	Miles
Aldyl A - MDPE 2306 & MDPE 2406	251.7
Orange MDPE 2306	119.0
Black HDPE 3306	0.2
Driscopipe 6500 - MDPE 2406	2.4
Yellow MDPE 2406	808.3
Black HDPE 3408/4710	565.0
Unknown	1,543.9
Total	3,290.4

Q. What efforts has the Company made to identify and categorize its unknown plastic pipe?

A. The Company categorizes and replaces its unknown plastic pipeline through thorough record reviews as well as opportunistically throughout the course of its construction operations. This two-pronged approach has reduced the overall mileage of unknown plastic by over 250 miles between 2022 and 2025, from 1,803 in 2021 to under 1,550 in 2025. The Company recognizes there is additional risk associated with unknown vintage plastic. As such, plastic with an unknown vintage in Company records is defaulted in the Company's Distribution asset risk model to the most conservative grade considering the install year.

Q. Has the Company identified any issues with specific material types of vintage plastic pipe?

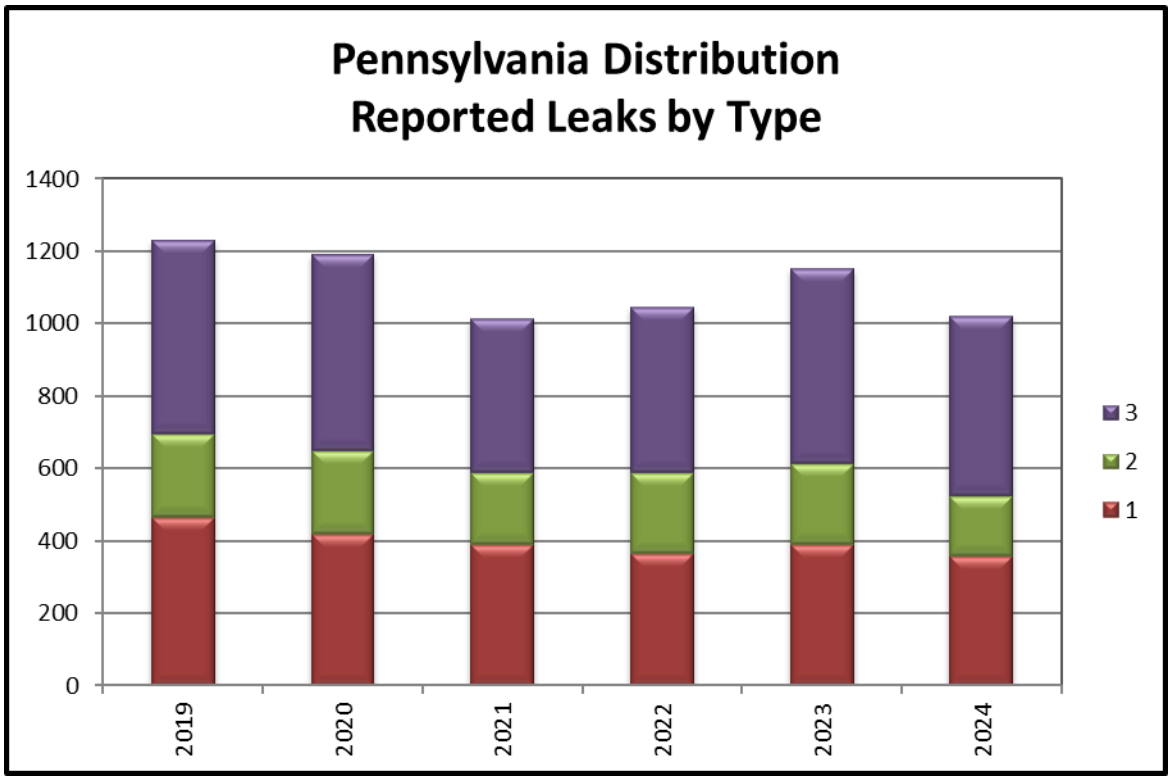
A. The Company tracks the risk of specific vintage plastic pipe materials through its DIMP and plastic system integrity program as described above. The primary issues discovered through these programs have been fusion issues attributed to rocky soil, backfill and operator installation. These issues are on a job-by-job basis and have not historically been associated with specific vintage plastic pipe materials.

Q. Please describe the Company's efforts to reduce system leaks.

A. Public safety is of primary importance for the Company. As part of its DIMP, the Company regularly evaluates and tracks system leak trends to determine if additional mitigation measures should be considered. The Company classifies leaks as Type 1,

Type 2 and Type 3 as described in its September 2, 2022, LTIIP filing and in its December 11, 2025, Amended LTIIP filing. Type 1 leaks are hazardous leaks that require an immediate response to protect life and property. As seen in Figure 3 below, Type 1 leaks have decreased by 23% between 2019 and 2024. In addition, Type 2 and Type 3 leaks have decreased by 28% and 7%, respectively between 2019 and 2024. This reduction in reported leaks can be attributed to the Company's pipeline modernization and systematic replacement program efforts during this period.

Figure 3: Distribution Reported Leaks by Type



Q. Please discuss the Company's historical, current, and proposed accelerated main replacement program.

A. As stated previously, from calendar year end 2016 through 2024, the Company has replaced 371 miles or 31% of its LPP bare steel and wrought iron and 7,337 or 34% of its

bare steel services. This included an acceleration under the Company's approved LTIIP from 2022-2024 of 50.5 miles and 972 services on an average annual basis compared to 45 miles and 899 services on an average annual basis from 2016-2022. In 2025 the Company replaced 52 miles of LPP, exceeding the Amended LTIIP mileage of 51 miles and resulting in approximately 764 miles of bare steel and wrought iron pipe remaining in the system. As seen in Table 7 below, to further enhance safety, reduce risk, and increase the overall reliability of its distribution system, the Company plans to continue to accelerate its LPP replacement program in 2026 and 2027.

Table 7: LPP Replacement (2023-2027)

Year	Type	Initial LTIIP Mileage	Actual Mileage	Amended LTIIP Mileage
2023	Distribution < 124 psig	44	45.9	
	Transmission & High Pressure > 124 psig	4	3.8	
	Total	**48**	**49.7**	
2024	Distribution < 124 psig	45	44.9	
	Transmission & High Pressure > 124 psig	7	7.8	
	Total	**52**	**52.7**	
2025	Distribution < 124 psig	46		46
	Transmission & High Pressure > 124 psig	7		5
	Total	**53**		**51**
2026	Distribution < 124 psig	47		50
	Transmission & High Pressure > 124 psig	7		4
	Total	**54**		**54**
2027	Distribution < 124 psig	50		50
	Transmission & High Pressure > 124 psig	7		7
	Total	**57**		**57**
LTIIP Total LPP Mileage		**264**	**264.4**	

As part of this acceleration, the Company plans to increase both distribution and transmission / high pressure leak prone pipe replacement to target retirement of all bare steel and wrought iron pipe by 2039. The Company defines transmission / high pressure main as pipe operating with a maximum operating pressure greater than 124 pounds per

square inch gage ("psig"). This pipe consists of approximately 11% of the Company's LPP and is planned to be replaced with cathodic protected coated steel pipe.

V. ENVIRONMENTAL

Q. Please discuss environmental management at the Company.

A. The Company is committed to environmental compliance and stewardship at all levels. The Company has a dedicated environmental management group within its Engineering Services department who work closely with our Project Engineering and Construction Management groups to assure all required environmental permitting, proper design and construction best management practices are followed through on our projects to assure environmental compliance. At the Company we consider environmental management to be the responsibility of all project team members including our engineers, construction and operations management and contractors. The Company prides itself on its history of environmental compliance and long-standing relationships and trust built with the environmental regulatory agencies we work with.

Q. Please describe the Company's Methane Emissions Reduction Program.

A. The Company has developed its Methane Emissions Reduction Program ("MERP") to help reduce methane emissions associated with the normal operation and maintenance of pipeline facilities. The MERP is used to determine the appropriate best management practice(s) ("BMP") to apply to pipeline and/or station shutdowns to reduce methane emissions. This program is incorporated into the engineering design process to allow adequate time for planning and collaboration with applicable parties to select and execute

practicable methods for minimizing methane releases. MERP targets medium and high-pressure pipeline blowdowns with volumes ≥ 5,000 Standard Cubic Feet ("SCF") (corrected volume) for application of BMP's. Where appropriate, BMP's may be considered for medium and high-pressure pipeline blowdowns for pipeline volumes between 1,000 and 4,999 SCF (corrected volume), however, portable compression equipment or portable flares should not be considered for these projects due to the greenhouse gas emissions associated with powering and transporting this equipment. BMPs included in the MERP are as follows:

- Pipeline pressure draw down into an adjacent lower pressure system through existing regulator stations.
- Pipeline pressure draw down into an adjacent lower pressure system through a temporary regulator and relief valve setup.
- Use of portable compression equipment.
- Use of portable flaring equipment where appropriate considering safety and customer relations.
- Minimizing pipeline segment blowdown length using existing valves and/or installation of controllable fittings, and squeeze-off of plastic pipe.
- Use of hot taps vs. shutdown and cutting in tees.
- Coordinating shutdowns for multiple projects/tasks.

Q. Does this conclude your direct testimony at this time?

A. Yes, it does.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 9-R

Rebuttal Testimony of Mark C. Schaefer

Topics Addressed: **Capital Budget**
Leak Prone Pipe Replacement Program

Dated: May 12, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Mark C. Schaefer. My business address is 1100 State Street, Erie Pennsylvania 16501.

Q. Did you previously submit testimony in this proceeding on behalf of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company")?

A. Yes. I submitted my direct testimony, National Fuel Statement No. 9, on January 28, 2026.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your rebuttal testimony.

A. The purpose of my testimony is to address the Bureau of Investigation & Enforcement's ("I&E") testimony regarding National Fuel's pipeline replacement. Specifically, I will address I&E's testimony regarding National Fuel's Long Term Infrastructure Improvement Plan ("LTIIP") pertaining to the Company's leak prone pipe ("LPP") replacement schedule and costs.

Q. Are you sponsoring any exhibits with your rebuttal testimony?

A. No.

III. LTIIP AND LPP REPLACEMENT ISSUE

Q. Please comment on I&E's concern that National Fuel will not meet the target of replacing all wrought iron and bare steel main by 2039[1].

A. Based on the remaining bare steel and wrought iron in the Company's system at the end of 2025, I&E used the average replacement schedule from 2021 through 2025 of 44.64 miles per year to project that it will take 17 years to replace all remaining bare steel and wrought iron pipe. I note that I&E's assumption is not accurate. Per the Company's amended LTIIP filing, and referenced in my testimony in Table 7, page 13, the proposed LPP replacement mileage for 2026 is 54 miles and the proposed replacement for 2027 is 57 miles. For 2028 and beyond, the Company plans to maintain the proposed replacement rate of 57 miles per year. This mileage includes both distribution and transmission/high pressure for bare steel and wrought iron pipe, as well as plastic pipe, as part of the Company's LPP Replacement Program. Since the Company defines transmission/high pressure main as pipe operating with a maximum operating pressure greater than 124 pounds per square inch gage ("psig"), this mileage includes bare steel reported on both the Gas Distribution System ("Gas Distribution") and Natural and Other Gas Transmission and Gathering Systems ("Gas Transmission") Annual DOT reports. At the end of the calendar year in 2025, the Company had a total of 749.91 miles of bare steel and wrought iron as reported on the Gas Distribution and Gas Transmission reports, including 615.761 miles of bare steel and 101.909 miles of wrought iron for Gas Distribution and 32.24 miles of bare steel for Gas Transmission. As seen in Table 1 below, by replacing 57 miles of LPP per year for 2028 and beyond, the Company will

[1] &E Statement No. 4, p. 10-11.

meet the targeted replacement mileages by 2039. Please note that this includes an average of 2 miles of plastic LPP replacement per year.

Table 1: Annual LPP Replacement (2026-2039)

Bare Steel and Wrought Iron Mileage

2025 DOT Gas Distribution Report	717.67
2025 DOT Gas Transmission Report	32.24
2025 Remaining Total	**749.91**

Year	*LPP Target	Calendar Year End LPP Remaining
2026	54	697.91
2027	57	642.91
2028	57	587.91
2029	57	532.91
2030	57	477.91
2031	57	422.91
2032	57	367.91
2033	57	312.91
2034	57	257.91
2035	57	202.91
2036	57	147.91
2037	57	92.91
2038	57	37.91
2039	57	-17.09

*Includes 2 miles per year of vintage plastic

Q. In testimony, I&E recommends that the Company break down replacement cost into multiple categories and track and analyze the independent costs on items such as materials, labor, restoration and permitting to better identify and negotiate

potential cost savings on a project-by-project basis[2]. Do you agree with I&E's recommendation?

A. No, because, as I will explain, the Company is already tracking and analyzing replacement costs, as well as examining areas for potential cost savings.

Q. How does the Company track and analyze replacement costs?

A. Most pipeline replacement is completed with contractor crews, both bid and blanket on a unit price basis. The unit price for each bid item includes all restoration, material, labor, and equipment to complete the specific construction task. Since those costs are rolled into the unit price for each bid item, a breakdown of those costs is not available. However, as part of the project planning phase, Engineering and Operations management, along with consideration of factors such as job location, schedule, complexity, etc., reviews each replacement project to determine the most economical contractor or company resource best fit to successfully complete the project. Blanket contracts are competitively bid and awarded to contractors by geographical region on a 3-year basis. The contracts include hundreds of bid items for mainline and service installation and removal including construction methods (i.e. trench, insertion, drill, etc.), size, length, material and restoration. The breakdown of each bid item allows the contractor to better refine their estimate and invoice based on the best fit application for each construction task. In addition, many projects are competitively bid on a per project basis to obtain the best value possible. The project planning phase includes measures to reduce and control costs by gathering and reviewing as-built information for existing gas and other utilities,

[2] I&E Statement No. 4, p. 14-15

designing one-call and mark out of existing utilities, conducting a field review of the proposed project to determine the best method for construction, minimizing impact to environmental and other natural resources, coordinating landowner issues, and minimizing or avoiding other potential conflicts. After a bid project is complete, a post investment analysis ("PIA") is submitted by the project engineer. The PIA includes a breakdown and comparison of the estimated versus actual costs as well as a comparison of the estimated versus actual construction schedule, including an explanation for any major variances. These variances are summarized and reviewed with Engineering and Operations management on a semi-annual basis to identify potential cost savings and improvements for future project planning.

Q. Does this conclude your rebuttal testimony at this time?

A. Yes, it does.

NATIONAL FUEL STATEMENT NO. 10

JOSHUA C. NOWAK

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 10

Direct Testimony of Joshua C. Nowak

Topics Addressed: Return on Equity

Dated: January 28, 2026

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I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.

A. My name is Joshua C. Nowak. I am employed by Concentric Energy Advisors, Inc. ("Concentric") as a Vice President. Concentric is a management consulting and economic advisory firm, focused on the North American energy and water industries. Based in Marlborough, Massachusetts, and Washington, D.C., Concentric specializes in regulatory and litigation support, financial advisory services, energy market strategies, market assessments, energy commodity contracting and procurement, economic feasibility studies, and capital market analyses. My business address is 293 Boston Post Road West, Suite 500, Marlborough, Massachusetts 01752.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

A. I am submitting this direct testimony to the Pennsylvania Public Utility Commission ("PUC" or the "Commission") on behalf of National Fuel Gas Distribution Corporation ("NFGDC" or the "Company").

Q. PLEASE DESCRIBE YOUR EXPERIENCE IN THE ENERGY AND UTILITY INDUSTRIES AND YOUR EDUCATIONAL AND PROFESSIONAL QUALIFICATIONS.

A. I hold a Bachelor's degree in Economics from Boston College and have more than 15 years of experience in providing economic, financial, and strategic advisory services. As a consultant, I primarily advise clients in regulated utility industries and have provided testimony regarding financial matters before multiple regulatory

agencies. I have advised numerous energy and utility clients on a wide range of financial and economic issues with primary concentrations in valuation and utility rate matters. Many of these assignments have included the determination of the cost of capital for valuation and ratemaking purposes. I have provided testimony before the Federal Energy Regulatory Commission ("FERC"), the Canada Energy Regulator ("CER"), as well as state and provincial jurisdictions in the U.S. and Canada. Prior to joining Concentric in 2018, I was employed by National Grid USA where I was responsible for regulatory filings related to the cost of capital across the company's multiple U.S. operating companies and service territories. A summary of my professional and educational background is presented in Exhibit JCN-1.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my direct testimony is to present evidence and provide a recommendation for the fair rate of return on equity ("ROE") for NFGDC, as well as assess the reasonableness of the Company's proposed capital structure.

Q. ARE YOU SPONSORING ANY EXHIBITS IN THIS PROCEEDING?

A. Yes. My analyses and recommendations are supported by the data presented in Exhibits JCN-2 through JCN-10, which have been prepared by me or under my direction. Exhibits JCN-2 through JCN-10 are presented in National Fuel Exhibit B. I sponsor the following Exhibits:

- JCN-1 – Summary of Professional Background and Experience
- JCN-2 – Comprehensive Summary of ROE Results
- JCN-3 – Proxy Group Screening Analysis

- JCN-4 – Constant Growth Discounted Cash Flow ("DCF") Analysis
- JCN-5 – Market Risk Premium ("MRP")
- JCN-6 – Capital Asset Pricing Model ("CAPM") Analysis
- JCN-7 – Bond Yield Plus Risk Premium Analysis
- JCN-8 – Comparative Size Analysis
- JCN-9 – Regulatory Framework Comparison
- JCN-10 – Proxy Group Capital Structure Analysis

II. SUMMARY OF TESTIMONY

Q. WHAT IS YOUR CONCLUSION REGARDING THE APPROPRIATE RATE OF RETURN FOR NFGDC?

A. I have estimated NFGDC's ROE based on the results of the DCF model, the CAPM, and the Bond Yield Plus Risk Premium ("Risk Premium") model, and have analyzed the general economic and capital market environment and the influence such conditions exert over the results. I also have analyzed the Company's business and regulatory risk profile that must be considered in determining where the Company's cost of equity falls within the range of analytical results. I recommend that the Commission authorize an overall rate of return of 11.25 percent for NFGDC. A summary of the results of my DCF, CAPM, and Risk Premium analyses are shown below in Figure 1.

FIGURE 1: SUMMARY OF RESULTS

	Median	Mean
DCF Result	10.70%	11.58%
CAPM Result	11.13%	11.19%
Risk Premium	10.40%	10.40%
Average	**10.92%**	**11.06%**

Based on the results of the DCF, CAPM, and Risk Premium analyses, I consider an ROE range of 10.30 percent to 11.30 percent to be reasonable. From within that range, and considering the Company's risk profile, I recommend a base ROE of 11.00 percent. In addition, I recommend a 25-basis point premium to recognize the Company's exceptional performance and efficiency, as summarized in the direct testimony of Rebecca E. Hillery, National Fuel Statement No. 1. The Commission's practice has been to recognize management performance through a rate of return incentive. My overall ROE recommendation is 11.25 percent.

Q. PLEASE PROVIDE A BRIEF OVERVIEW OF THE ANALYSES THAT YOU CONDUCTED TO SUPPORT YOUR ROE RECOMMENDATION.

A. As mentioned, my ROE recommendation is based on the range of results produced from the DCF, CAPM, and Risk Premium methodologies. Analysts and academics understand that ROE models are tools to be used in the ROE estimation process, and that strict adherence to any single approach, or the specific results of any single approach, may lead to flawed conclusions. No model can exactly pinpoint the correct cost of equity, but each is designed to provide a unique estimate of the return

required to attract equity investment. Therefore, my analysis considers the range of results produced by these three different models. The DCF analysis estimates the cost of equity based on market data on dividend yields and analysts' projected earnings per share growth rates from reputable third-party sources. The CAPM analysis is based on both current and forecasted interest rates and a forward-looking market risk premium. The Risk Premium approach calculates the risk premium as the spread between authorized ROEs for natural gas utilities and Treasury bond yields. My ROE recommendation is ultimately based on the range of results produced by these three methodologies.

My recommendation is also informed by the general economic and capital market environment, and the influence capital market conditions exert over the results of the DCF, CAPM, and Risk Premium models. In addition, I consider the Company's business and regulatory risks in relation to a set of proxy companies to assist in the determination of the appropriate ROE and capital structure from within the range of my analytical results.

Q. HOW IS THE REMAINDER OF YOUR DIRECT TESTIMONY ORGANIZED?

A. The remainder of my Direct Testimony is organized as follows:

- Section III provides background on the regulatory principles that guide the determination of ROE.
- Section IV presents a review of current and prospective economic and capital market conditions and the implications on the cost of capital for utilities.

- Section V describes the criteria and approach for the selection of a proxy group of comparable companies.
- Section VI provides a description of the data and methodologies used to estimate the cost of equity, as well as the results of the various ROE estimation models and concludes with my recommendation and an assessment of its reasonableness under the *Hope* test.
- Section VII discusses NFGDC's regulatory and business risks, relative to the proxy group.
- Section VIII provides the overall rate of return, including NFGDC's capital structure and cost rates.
- Finally, Section IX summarizes my results, conclusions, and recommendation.

III. REGULATORY PRINCIPLES

Q. PLEASE DESCRIBE THE GUIDING PRINCIPLES USED IN ESTABLISHING THE COST OF CAPITAL FOR A REGULATED UTILITY.

A. The foundations of public utility regulation require that utilities receive a fair rate of return sufficient to attract needed capital to maintain important infrastructure for customers at reasonable rates. The basic tenets of this regulatory doctrine originate from several bellwether decisions by the United States Supreme Court, notably *Bluefield Waterworks and Improvement Company v. Public Service Commission of West Virginia*, 262 U.S. 679 (1923) ("*Bluefield*"), and *Federal Power Commission*

v. Hope Natural Gas Company, 320 U.S. 591 (1944) ("*Hope*"). In *Bluefield*, the Court stated:

> A public utility is entitled to such rates as will permit it to earn a return on the value of the property which it employs for the convenience of the public equal to that generally being made at the same time and in the same general part of the country on investments in other business undertakings which are attended by corresponding risks and uncertainties…
>
> The return should be reasonably sufficient to assure investor confidence in the financial soundness of the utility and should be adequate, under efficient and economical management, to maintain and support its credit and enable it to raise the money necessary for the proper discharge of its public duties.

Later, in *Hope*, the Court established a standard for the ROE that remains the guiding principle for ratemaking in regulatory proceedings to this day:

> [T]he return to the equity owner should be commensurate with returns on investments in other enterprises having corresponding risks. That return, moreover, should be sufficient to assure confidence in the financial integrity of the enterprise, so as to maintain its credit and to attract capital.

Q. PLEASE EXPLAIN HOW THESE PRINCIPLES APPLY IN THE CONTEXT OF THE REGULATED RATE OF RETURN.

A. Regulated utilities rely primarily on common stock and long-term debt to finance their operations, including permanent property, plant, and equipment. The allowed rate of return for a regulated utility is based on its weighted average cost of capital, where the costs of the individual sources of capital (i.e., debt and equity) are typically weighted by their respective book values. Since the ROE, which represents the cost of raising and retaining equity capital, is not directly observable, it is estimated by using one or more analytical techniques that use market data to quantify investor requirements for equity returns. However, investors rely on a multi-faceted approach to determine their required returns. As such, the ROE cannot be estimated through quantitative metrics and models alone. To properly estimate the ROE, the financial, regulatory, and economic context must also be considered.

The DCF, CAPM, and Risk Premium approaches, while fundamental to the ROE determination, are still only models. To determine a fair and reasonable ROE in line with the *Hope* and *Bluefield* standards, model results must be applied with informed judgment, with consideration of economic and capital market conditions and the relative risk of NFGDC compared to the companies with reasonably similar risk.

Based on these widely recognized standards, the Commission's order in this case should provide NFGDC with the opportunity to earn a return on equity that is:

- Adequate to allow the Company to attract the capital that is necessary to provide safe and reliable service (the "capital attraction standard");
- Sufficient to ensure the Company's ability to maintain its financial integrity (the "financial integrity standard"); and
- At a level that is comparable to returns required on investments of similar risk (the "comparability standard").

Importantly, a fair return must satisfy all three of these standards. The allowed ROE should enable the Company to finance its operations and capital expenditures on reasonable terms and provide it with the ability to raise capital under a full range of capital market circumstances to serve its customers.

Q. IS NFGDC'S ABILITY TO ATTRACT EQUITY CAPITAL AFFECTED BY ROES THAT ARE AUTHORIZED FOR OTHER UTILITIES?

A. Yes, it is. NFGDC competes with other investments of similar risk for equity capital from the market. Since investors have a finite pool of capital to allocate among investments, the ROE awarded to each utility provides investors with signals regarding regulatory support for financial integrity, dividends, growth, and fair compensation for business and financial risk. A company's cost of equity is defined by, and equal to, the opportunity cost of investing in that company. In other words, if higher returns are available from other investments of comparable risk, investors will direct their capital to those investments. If NFGDC's authorized ROE is set below the ROEs authorized for other utilities of comparable risk, the Company may face challenges in attracting capital on reasonable terms, leading to a decline in service quality and adversely affecting its customers.

Q. WHAT ARE YOUR CONCLUSIONS REGARDING REGULATORY PRINCIPLES?

A. The ratemaking process is premised on the principle that, in order for investors and companies to commit the capital needed to provide safe and reliable utility services, the utility must have the opportunity to recover invested capital and the market-required return on that capital. Because utility operations are capital intensive, regulatory decisions should enable the utility to attract capital on reasonable terms regardless of market conditions. Investors carefully monitor the current and expected financial condition of utility companies, as well as the regulatory environment in which they operate. In that respect, the regulatory environment is one of the most important factors considered by both debt and equity investors in their assessments of risk. It is therefore essential that the ROE authorized in this proceeding take into consideration the current and expected capital market conditions in which NFGDC operates, as well as investors' required returns commensurate with the risks they undertake. A fair and reasonable authorized ROE is required to not only support the Company's continued capital investment with capital raised on reasonable terms, but also to maintain confidence in Pennsylvania's regulatory environment among credit rating agencies and investors.

IV. ECONOMIC AND CAPITAL MARKET CONDITIONS

Q. WHY IS IT IMPORTANT TO CONSIDER THE EFFECTS OF CURRENT AND EXPECTED ECONOMIC AND FINANCIAL MARKET CONDITIONS WHEN SETTING THE APPROPRIATE ROE?

A. Because utilities are obligated to serve customers safely and reliably regardless of economic conditions, they must maintain consistent access to capital across all market environments. The authorized ROE for a public utility should allow the utility to attract investor capital at a reasonable cost under current and foreseeable economic and financial conditions as underscored by the *Hope* and *Bluefield* decisions discussed previously. The standard ROE estimation tools, such as the DCF, CAPM, and Risk Premium models, incorporate specific economic and financial data. However, these inputs reflect only a subset of the various economic and market forces that determine a utility's required return. It is also important to consider the appropriateness and reasonableness of the inputs in light of expected economic conditions. If investors do not expect current market conditions to continue in the future, it is possible that the ROE estimation models will not provide an accurate estimate of investors' forward-looking required return. Therefore, an assessment of current and projected market conditions is integral to any ROE recommendation.

Q. WHAT ARE THE KEY FACTORS AFFECTING THE COST OF EQUITY FOR REGULATED UTILITIES IN THE CURRENT AND PROSPECTIVE CAPITAL MARKETS?

A. The cost of equity for regulated utility companies is currently affected by several

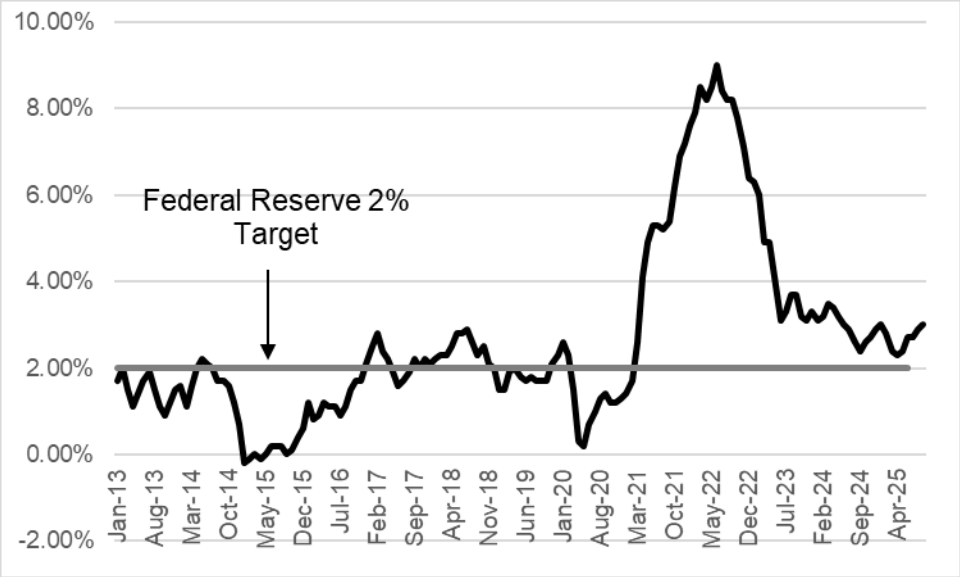
key factors including (1) the interest rate environment and central bank monetary policy; (2) inflationary pressure and the longer-term outlook for inflation; and (3) uncertainty in the economic environment resulting from geopolitical events. As discussed below, although the Federal Reserve reduced the Federal Funds rate six times in the last two years as inflation stabilized and moved closer to the central bank's two percent target, interest rates and inflation are expected to elevated relative to the exceptionally low interest-rate conditions that prevailed in the early 2020s. Despite the 175 basis point reduction in the Federal Funds rate since September 2024, long-term interest rates have not declined and are not expected to change substantially in the coming years. Further, geopolitical events and U.S. foreign trade policy present significant uncertainties with respect to the near-term economic and capital market environment in which NFGDC will be raising capital. As artificial intelligence workloads have grown substantially requiring infrastructure expansions, including data center development, there are several industries offering comparatively attractive returns. NFGDC and other utilities must compete for equity capital with other industries. Therefore a reasonable return is necessary to attract capital in an increasingly competitive capital market environment.

Q. HOW HAVE ECONOMIC AND FINANCIAL CONDITIONS CHANGED IN RECENT MONTHS?

A. At the end of 2024, financial markets were optimistic that the Federal Reserve was close to attaining a "soft landing" by taming inflation without a consequential rise in unemployment. Over the past few months, however, federal policy uncertainty

has climbed sharply, and financial market volatility has increased. Since the announcement of the Administration's tariff policies in early April, data have shown a vulnerable and slowing economy with consumer and business sentiment declining and growing anticipation of higher inflation.[1]

FIGURE 2: U.S. CONSUMER PRICE INDEX ("CPI"), Y-O-Y CHANGE (2014-2025)[2]



As the University of Michigan's Surveys of Consumers Director Joanne Hsu explains regarding consumer sentiment on inflation for December 2025:

> After four months of sharp increases to start 2025, long-run expectations fell for three consecutive months through July, followed by three more months of small increases. Long-run expectations softened over the past two months. The December preliminary reading is well below peaks in monthly readings from June 2022 and April 2025, but above most 2024 readings as well as

1 See, e.g., Blue Chip Financial Forecasts, Vol. 44, No. 5, May 1, 2025, at 1.

2 U.S. Bureau of Labor Statistics. Data as of October 30, 2025 was not available as of January 6, 2026. Bureau of Labor Statistics reported a year-over-year change of 2.70 percent for November 2025.

readings from 2020 and earlier. Expectations exhibit substantial uncertainty, though less than in mid-2025.[3]

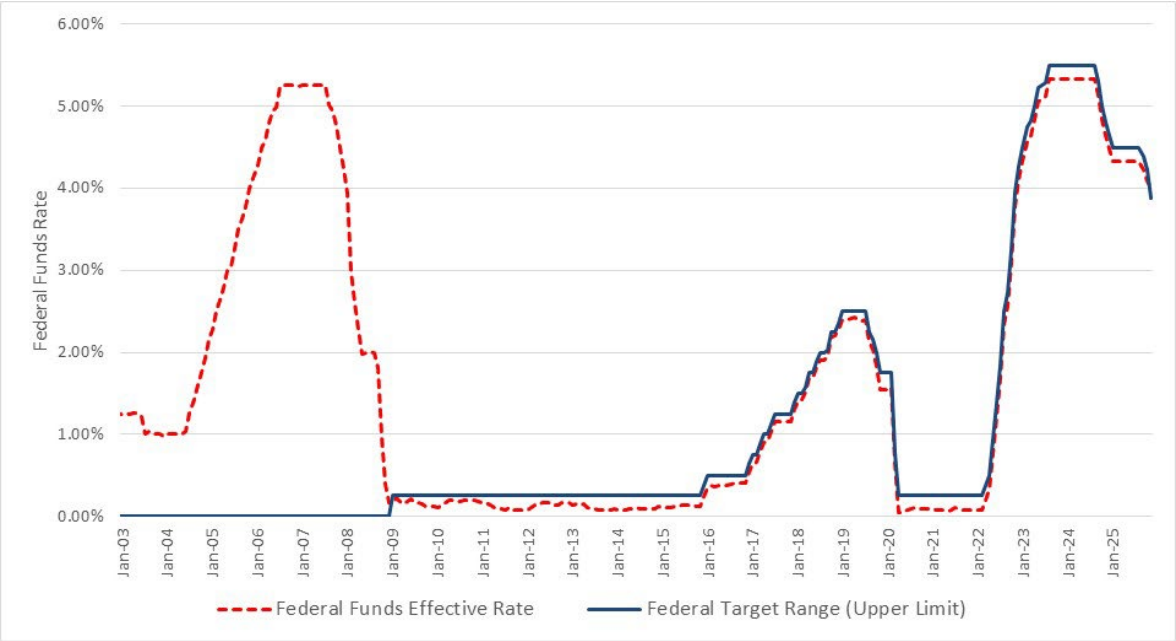
Q. PLEASE DESCRIBE THE FEDERAL RESERVE'S RECENT MONETARY POLICY ACTIONS.

A. As shown in Figure 3, the Federal Open Market Committee ("FOMC") has cut rates by 25 basis points three times since April 2025, ending 2025 with the Federal Funds target range of 3.50 to 3.75 percent. In doing so, the FOMC noted the downside risks to employment on one hand but that "[i]nflation has moved up since earlier in the year and remains somewhat elevated."[4] The FOMC has been increasingly divided on the outlook and future rate actions, causing short-term rate expectations to become more volatile.

3 University of Michigan Surveys of Consumers, "December 2025 (P) Update: Current versus Pre-Pandemic Long-Run Inflation Expectations", December 5, 2025. Accessed January 6, 2026, https://www.sca.isr.umich.edu/files/px5web202512p.pdf.

4 Federal Reserve FOMC Press Release, December 10, 2025, https://www.federalreserve.gov/monetarypolicy/files/monetary20251210a1.pdf

FIGURE 3: FOMC FEDERAL FUNDS RATES

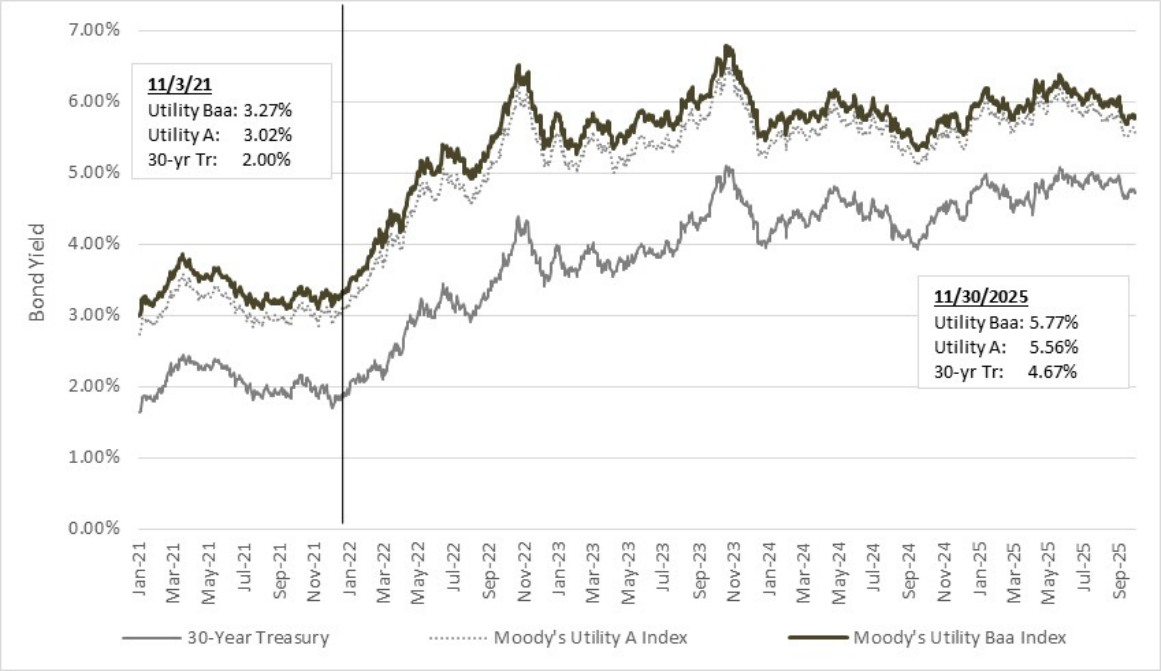


The Fed's recent policy actions follow a period of substantial monetary tightening in 2022 and 2023 in response to the rapid economic rebound following the COVID-19 lockdowns. During this time, the Federal Reserve tightened monetary policy at the fastest pace since the 1980s by increasing the Federal Funds rate by 525 basis points over the course of 11 consecutive Federal Open Market Committee ("FOMC") meetings between March 2022 and July 2023, as shown in the figure above. Although the pace of inflation has subsided from its peak reached in 2022, inflation remains above the Federal Reserve's 2.0 percent target, ticking up to 3.00 percent as of September 30, 2025.

Q. HOW DID GOVERNMENT AND UTILITY BOND YIELDS RESPOND TO THE FEDERAL RESERVE'S MONETARY POLICY TIGHTENING?

A. As the U.S. economy improved in 2021 and the Federal Reserve moved aggressively to tighten monetary policy to fight stubbornly higher inflation, prevailing interest rates have risen to their highest levels since 2010. As shown in Figure 4 below, the 30-year Treasury yield has increased 267 basis points since November 3, 2021 when the Federal Reserve signaled it would begin tapering its asset purchases. Utility bond yields have increased by nearly 250 basis points over the same period.

FIGURE 2: 30-YEAR TREASURY BOND AND UTILITY BOND YIELDS (2021-2025)[5]



Q. PLEASE EXPLAIN HOW HIGHER BOND YIELDS AFFECT THE ROE ESTIMATES.

A. The 30-Year Treasury bond yield is a direct input to both the CAPM and the Risk Premium models because the term of the security aligns with the long life of gas

5 Sources: Federal Reserve Bank of St. Louis, FRED Economic Database; Bloomberg Professional.

utility assets. As yields increase, the cost of capital generally increases, and the ROE estimates from those two models also increase, although not on a one-to-one basis. Further, while interest rates are not a direct input to the DCF model, dividend yields on utility stocks must compete with yields on Treasury bonds. As interest rates on government bonds increase, utilities must offer a higher dividend yield to attract and retain investors, signaling an increase in the cost of equity for utilities. All else equal, higher dividend yields produce higher ROE estimates in the DCF model.

Q. HOW HAVE CAPITAL MARKETS RESPONDED TO THE FEDERAL RESERVE'S POLICY ACTIONS?

A. The Federal Reserve's rate since 2024 have had little effect on long-term government and utility bond yields. Long-term bond yields are less sensitive to the Federal Reserve's monetary policy, and as such have not declined as much as short-term yields, even as the Fed has reduced the Federal Funds rate. As noted by Charles Schwab, "intermediate- and long-term interest rates will continue to respond to expectations about economic growth and inflation."[6] As shown in Figure 5 below, since the end of June 2024 (prior to the Fed's rate cuts), the 1-year and 2-year Treasury yields declined by 148 and 124 basis points, respectively, whereas the 30-year Treasury yields actually *increased* by 16 basis points.

6 Charles Schwab, "Fed Cuts Rates for the Third Time This Year," December 10, 2025. Accessible at: https://www.schwab.com/learn/story/fomc-meeting

FIGURE 5: U.S. TREASURY YIELDS (JUNE 2024 VS. NOVEMBER 2025)[7]

	1-Year Treasury	2-year Treasury	30-Year Treasury
June 28, 2024	5.09%	4.71%	4.51%
November 28, 2025	3.61%	3.47%	4.67%
Change	-1.48%	-1.24%	+0.16%

Therefore, current long-term yields have not declined commensurate with reductions in the Federal Funds rate but have stayed relatively flat or increased. Since the equity value of utility investments is based on long-lived assets and the models used to estimate the just and reasonable ROE accordingly rely primarily on long-term yields, ROE model results are typically influenced more by the changes in longer-term yields rather than short-term yields.

Q. HOW HAVE CAPITAL MARKETS RESPONDED TO THE FEDERAL RESERVE'S MONETARY POLICY?

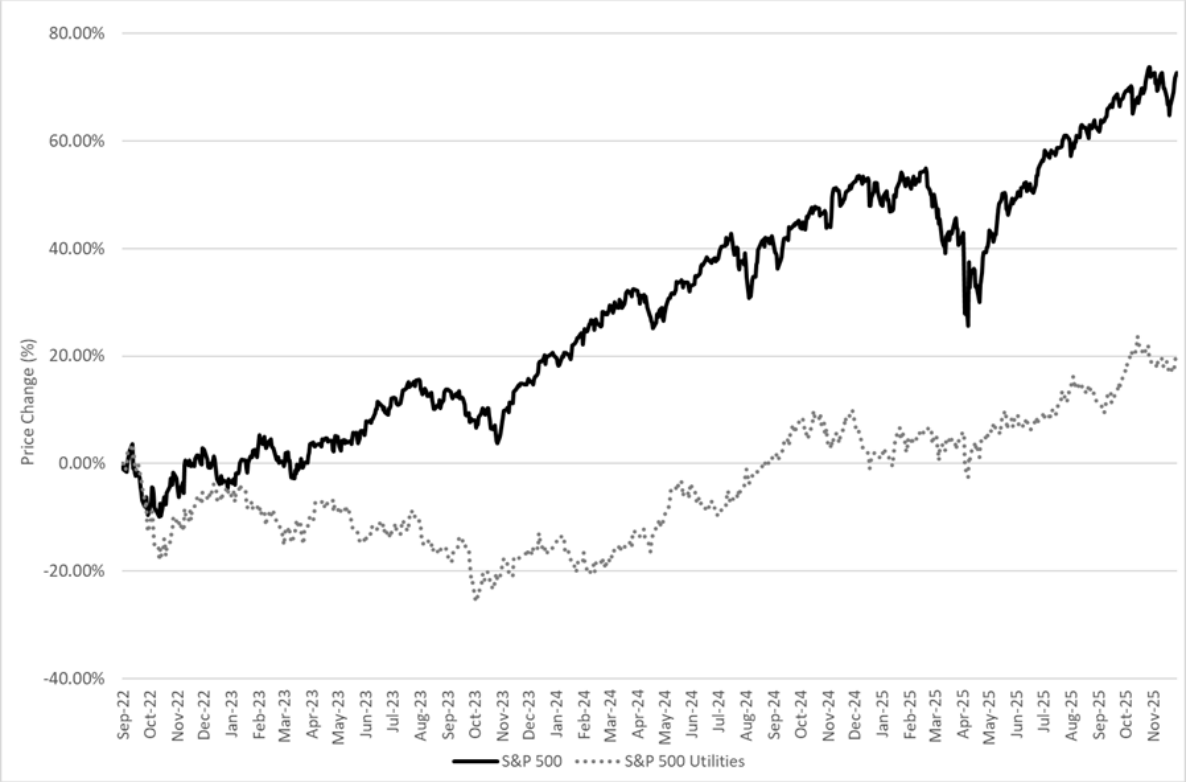
A. While the S&P 500 closed at record highs on the first trading day of 2022, by mid-June of that year, the S&P 500 was down more than 21 percent, at that time wiping out all of 2021's gains.

Although the S&P 500 has steadily gained ground since that time, the utility sector has fared far worse. From September 2022, at the peak of core inflation,

7 Source: Spot yields reported by Federal Reserve Board of Governors, H15 Selected Interest Rates. https://www.federalreserve.gov/datadownload/Choose.aspx?rel=H15

through November 2025, on a total return basis (which includes dividends), the S&P 500 Index increased over 72 percent, but the S&P 500 Utilities Index increased by approximately 20 percent, as shown in Figure 6. As a practical matter, there are several industries offering attractive returns for equity investments as data center expansions have fueled economic growth. As such, utilities must maintain reasonable returns to attract capital in an increasingly competitive environment.

FIGURE 6: S&P 500 AND S&P 500 UTILITIES INDICES PERFORMANCE
(SEPTEMBER 1, 2022 – NOVEMBER 28, 2025)



Q. PLEASE DISCUSS RECENT CHANGES IN U.S. TRADE POLICY.

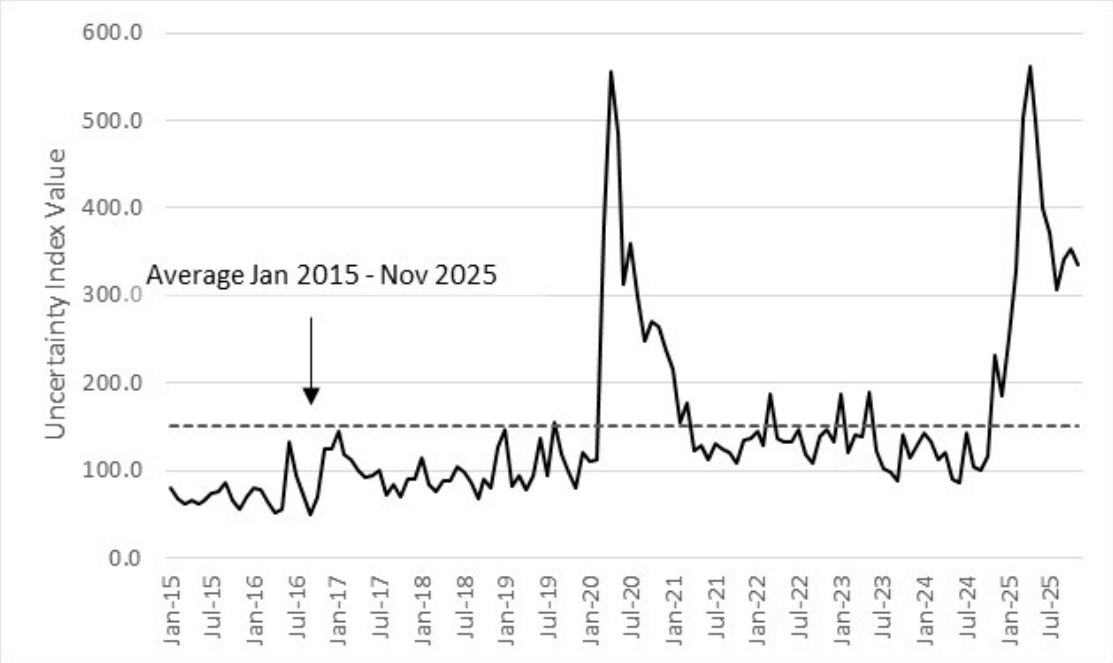
A. During the first half of 2025, the Trump administration had announced, implemented, or delayed implementation of tariffs on numerous U.S. trade partners. A highlight of this is when, on April 2, 2025, President Trump announced the

administration would impose a 10 percent base tariff on all imports from nearly every country plus an additional "reciprocal" tariff customized for each of approximately 60 countries.[8] These reciprocal tariffs were subsequently paused, but significant uncertainty remains around the future course of U.S. trade policy and how it will affect the economy.

This created significant policy and market uncertainty; as can be seen in Figure 7 below, the Federal Reserve Bank of St. Louis' Economic Policy Uncertainty Index (the "Index") spiked to levels not seen since the COVID-19 pandemic. The Index has recently retreated from its peak levels in mid-2025 (to 335.88 as of November 30, 2025), but remains significantly above the average level since 2015 (151.02) and the levels in October 2022 and June 2023 (139.83 and 122.39, respectively) that correspond with the filing and Commission Order in NFGDC's last rate case. Ongoing trade negotiations and temporary agreements between the U.S. and other countries indicate that there is still significant uncertainty related to international trade and the economy. As a general premise, uncertainty increases risk causing investors to require a higher return, which increases the cost of equity, all else equal.

8 https://www.whitehouse.gov/presidential-actions/2025/04/regulating-imports-with-a-reciprocal-tariff-to-rectify-trade-practices-that-contribute-to-large-and-persistent-annual-united-states-goods-trade-deficits/·

FIGURE 3: ECONOMIC POLICY UNCERTAINTY INDEX JANUARY 1, 2015 – NOVEMBER 30, 2025[9]



Q. PLEASE EXPLAIN WHY ELEVATED INTEREST RATES ARE IMPORTANT TO THE ROE ANALYSIS.

A. In general, as interest rates on government bonds increase, the cost of capital also must increase, as utilities—competing with interest rates on government bonds—must offer higher dividend yields to attract and retain investors. As utility dividend yields increase, however, the utility stock price declines (and, therefore, the cost of equity increases). The reason for this is that the stock price inherently reflects a company's future cash flows, thus, future dividends are factored into the share price. After an ex-dividend date (i.e., the date on which a dividend is paid), the stock price often declines to reflect the dividend paid (i.e., distributing a proportion of profits to shareholders). As interest rates remain elevated, utilities must continue

9 Federal Reserve Bank of St. Louis, https://fred.stlouisfed.org/series/USEPUINDXD

to pay high dividends to keep investors, which suggests that the stock price of these companies would decline (and the cost of equity increase) in response to interest rates. In general, all else equal, higher dividend yields produce higher ROE estimates in DCF models. Additionally, as interest rates are a direct input to both the CAPM and the Risk Premium models, higher interest rates produce higher ROE estimates in these models.

Q. HAVE YOU FACTORED THESE CIRCUMSTANCES INTO YOUR COST OF EQUITY ESTIMATES FOR NFGDC, AND, IF SO, WHAT CONCLUSIONS DO YOU DRAW?

A. Yes. I have relied on the most recent market data and forecasts available to me in my analysis and ROE recommendation. Long-term interest rates have increased substantially since the historical lows of 2020 and are expected to remain elevated as the Federal Reserve continues to contend with inflation and rising unemployment. As interest rates increase, the cost of capital generally increases. Interest rates are direct inputs to the CAPM and risk premium analyses and indirectly affect the DCF models, as increasing interest rates influence increases in dividend yields (and decreases in utility stock prices, which suggest an increase in the cost of equity).

Q. WHAT IS YOUR CONCLUSION REGARDING HOW MARKET CONDITIONS AFFECT THE COST OF EQUITY FOR UTILITIES SUCH AS NFGDC?

A. My primary conclusion is that the cost of capital for both debt and equity has increased for utilities, including NFGDC. This increase is reflected in the results of

the models used to estimate the cost of equity. Although the Federal Reserve has cut the level of short-term interest rates, yields on long-term government and utility bond yields increased sharply in 2022 and have remained elevated. Further, inflation has remained stubbornly above the Fed's target level of 2.0 percent, and tariffs could cause inflation to increase again as companies pass through these duties to end-use customers. It is important to recognize that there has been a fundamental change in economic and capital market conditions, and the cost of equity capital for utilities has increased. These factors underscore the importance of using multiple models when determining NFGDC's cost of equity to gain a comprehensive perspective of the effect of fluid and evolving market conditions on the cost of equity.

V. PROXY GROUP SELECTION

Q. WHY IS IT NECESSARY TO SELECT A PROXY GROUP TO ESTIMATE THE COST OF EQUITY FOR NFGDC?

A. Since the ROE is a market-based concept and NFGDC is not publicly traded, it is necessary to establish a group of companies that is both publicly traded and comparable to the Company. Even if NFGDC were a publicly traded entity, it is possible that transitory events could bias the Company's market value in one way or another in a given period. A significant benefit of using a proxy group is the ability to mitigate the effects of short-term events that may be associated with any one company. The proxy companies used in my ROE analyses possess a set of business and operating characteristics similar to the Company's natural gas utility operations, and thus provide a reasonable basis for estimating the Company's ROE.

Q. PLEASE PROVIDE A SUMMARY PROFILE OF NFGDC.

A. The Company is a wholly-owned subsidiary of National Fuel Gas Company ("NFG") and provides natural gas distribution service to approximately 756,000 customers, with 213,000 customers in Pennsylvania and 543,000 customers in New York.[10] The Company does not have stand-alone credit ratings. However, its parent company, NFG, has long-term issuer ratings from Moody's of Baa3 (Outlook: Stable), S&P of BBB- (Outlook: Stable), and Fitch Ratings ("Fitch") of BBB (Outlook: Stable).[11]

Q. PLEASE DESCRIBE THE SPECIFIC SCREENING CRITERIA YOU HAVE UTILIZED TO SELECT THE PROXY GROUP.

A. I began with the nine investor-owned domestic natural gas distribution companies covered by Value Line and then screened companies according to the following criteria:

1. Consistently pays quarterly cash dividends;
2. Maintains an investment grade long-term issuer rating (BBB- or higher) from S&P;
3. Is covered by more than one equity analyst;
4. Has positive earnings growth rates published by at least two of the following sources: Value Line, S&P Capital IQ, and Zacks Investment Research ("Zacks");

10 National Fuel Investor Presentation, Fiscal 2025 – 4th Quarter and Full year Update, November 5, 2025.

11 S&P Capital IQ Pro, Fitch Ratings.

5. Regulated net operating income makes up more than 50 percent of the consolidated company's net operating income (based on a 3-year average from 2022-2024);
6. Regulated net operating income from regulated natural gas distribution makes up more than 60 percent of the consolidated company's regulated net operating income (based on a 3-year average from 2022-2024); and
7. Is not involved in a merger or other transformative transaction.

Q. WHAT IS THE COMPOSITION OF YOUR RESULTING PROXY GROUP?

A. Based on the screening criteria discussed above, and financial information through fiscal year 2024, I arrived at a proxy group consisting of the 7 companies shown in Figure 8. The results of my screening process are shown in Exhibit JCN-3.

FIGURE 8: PROXY GROUP

Company	Ticker
Atmos Energy Corporation	ATO
New Jersey Resources Corporation	NJR
NiSource Inc.	NI
Northwest Natural Holding Co.	NWN
ONE Gas Inc.	OGS
Southwest Gas Holdings, Inc.	SWX
Spire, Inc.	SR

Q. IS IT APPROPRIATE TO INCLUDE SPIRE, INC. IN YOUR PROXY GROUP, DESPITE ITS RECENT TRANSACTION?

A. Yes, it is. Spire, Inc. ("Spire") announced that it is acquiring the Piedmont Gas Tennessee business from Duke Energy.[12] However, considering that the acquisition is not anticipated to have a transformative effect on the company, Spire will continue to be a predominantly natural gas utility company. In fact, the transaction will expand Spire's natural gas utility operations. Further, the purpose of this screen is to eliminate the impact of extraordinary price changes, such as those often caused by merger and acquisition activity. Since the announcement in July 2025, there has been no meaningful change in Spire's stock price performance relative to other utility companies. Further, Exhibit JCN-2 presents the model results both including and excluding Spire from the proxy group and the mean results are substantially similar.

Q. DO YOUR SCREENING CRITERIA RESULT IN A GROUP OF COMPANIES THAT INVESTORS WOULD VIEW AS COMPARABLE TO NFGDC'S OPERATIONS?

A. Yes. While no proxy group will be identical in risk to NFGDC, I believe this group of natural gas utilities is reasonably comparable to the financial and operational characteristics of NFGDC. The proxy group screening criterion requiring an investment grade credit rating ensures that the proxy group companies, like NFGDC, are in sound financial condition. Additionally, I have screened based on the percent of net operating income derived from regulated operations to

12 Spire, Inc. "Spire to acquire Tennessee Piedmont Natural Gas business from Duke Energy." July 29, 2025. Available here: https://investors.spireenergy.com/news/news-details/2025/Spire-to-acquire-Tennessee-Piedmont-Natural-Gas-business-from-Duke-Energy/default.aspx

differentiate between utilities that are protected by regulation and those with substantial unregulated operations or market-related risks. Finally, the screening criterion of percentage contribution of the natural gas utility segment to regulated consolidated financial results ensures that proxy companies are focused on natural gas utility operations, since this proceeding is limited to determining the appropriate ROE for the stand-alone gas distribution operations of NFGDC. These screens collectively reflect key risk factors that investors consider in making investments in natural gas utilities. The results of the screening criterion on each potential proxy company are presented in Exhibit JCN-3.

Q. WHAT IS YOUR CONCLUSION WITH REGARD TO THE PROXY GROUP FOR NFGDC?

A. I conclude that my group of seven natural gas utilities adequately reflects the broad set of risks that investors consider when investing in a natural gas distribution company such as NFGDC's natural gas utility operations.

VI. DETERMINATION OF THE APPROPRIATE COST OF EQUITY

Q. WHAT MODELS DID YOU USE IN YOUR ROE ANALYSES?

A. I have considered the results of several ROE estimation models, including the Constant Growth DCF model, the CAPM, the Bond Yield Plus Risk Premium approaches. Consistent with the practice of many analysts, when estimating the cost of equity, I gather and evaluate as much relevant data (both quantitative and qualitative) as can be reasonably obtained.

A. Constant Growth DCF Model

Q. PLEASE DESCRIBE THE DCF APPROACH.

A. The DCF approach is based on the theory that a stock's current price represents the present value of all expected future cash flows, which for purposes of the model, are assumed to be equal to all expected future dividends. Thus, the return required by investors is implied by the per share price of a company's common stock. In its most general form, the DCF model is expressed as follows:

$$P_0 = \frac{D_1}{(1+k)} + \frac{D_2}{(1+k)^2} + ... + \frac{D_\infty}{(1+k)^\infty} \qquad [1]$$

Where P_0 represents the current stock price, $D_1 \ldots D_\infty$ are all expected future dividends, and k is the discount rate, or required ROE. Equation [1] is a standard present value calculation, which can be simplified and rearranged, to the Constant Growth form of the DCF model, expressed as the sum of the expected dividend yield and long-term growth rate:

$$k = \frac{D(1+g)}{P_0} + g \qquad [2]$$

Where "k" equals the required return, "D" is the current dividend, "g" is the expected growth rate, and "P_0" represents the current stock price. Stated in this manner, the cost of common equity is equal to the expected dividend yield plus the dividend growth rate.

Q. WHAT ARE THE ASSUMPTIONS UNDERLYING THE CONSTANT GROWTH DCF MODEL?

A. The Constant Growth DCF model is based on the following assumptions: (1) a constant average growth rate for earnings and dividends; (2) a stable dividend payout ratio; (3) a constant price-to-earnings multiple; and (4) a discount rate greater than the expected growth rate.

Q. PLEASE SUMMARIZE YOUR APPLICATION OF THE CONSTANT GROWTH DCF MODEL.

A. I calculated DCF results for each of the proxy group companies using the following inputs:

- Average stock prices for the historical period, over 30, 90, and 180 trading days through November 28, 2025;
- Annualized dividend per share as of November 28, 2025; and
- Company-specific earnings growth forecasts for the term *g*.

My application of the Constant Growth DCF model is provided in Exhibit JCN-4.

Q. WHY DID YOU USE AVERAGING PERIODS OF 30, 90, AND 180 TRADING DAYS?

A. It is important to use an average of recent trading days to calculate the term *P* in the DCF model to ensure that the calculated ROE is not skewed by anomalous events that may affect stock prices on any given trading day. At the same time, it is important to reflect the conditions that have defined the financial markets over the recent past. In my view, consideration of those three averaging periods reasonably balances these interests.

Q. DID YOU ADJUST THE DIVIDEND YIELD TO ACCOUNT FOR PERIODIC GROWTH IN DIVIDENDS?

A. Yes, I did. Utility companies tend to increase their quarterly dividends at different times throughout the year, so it is reasonable to assume that such increases will be evenly distributed over calendar quarters. Given that assumption, it is reasonable to apply one-half of the expected annual dividend growth rate for the purposes of calculating this component of the DCF model. This adjustment ensures that the expected dividend yield is representative of the coming 12-month period. Accordingly, the DCF estimates reflect one-half of the expected growth in the dividend yield.[13]

13 The expected dividend yield is calculated as $d_1 = d_0 (1 + ½ g)$.

Q. WHAT SOURCES OF GROWTH HAVE YOU USED IN YOUR DCF ANALYSIS?

A. I have used the consensus analyst five-year growth estimates in earnings per share ("EPS") from S&P Capital IQ and Zacks, as well as EPS growth rate estimates published by Value Line.

Q. WHY DID YOU FOCUS ON EPS GROWTH?

A. The Constant Growth DCF model assumes that dividends grow at a constant rate in perpetuity. Accordingly, in order to reduce the long-term growth rate to a single measure, one must assume a constant payout ratio, and that earnings per share, dividends per share, and book value per share all grow at the same constant rate. Over the long term, however, dividend growth can only be sustained by earnings growth. As noted by Brigham and Houston in their text, *Fundamentals of Financial Management*: "Growth in dividends occurs primarily as a result of growth in *earnings per share* (EPS)."[14] It is therefore important to focus on measures of long-term earnings growth from credible sources as an appropriate measure of long-term growth in the DCF model.

Q. IS YOUR USE OF EPS GROWTH RATES IN LINE WITH THE COMMISSION'S APPROACH?

A. Yes, it is. In its determination of the "Current DCF", which ultimately factors into the Commission's Market Based Returns on Common Equity,[15] the Bureau of

14 Eugene F. Brigham and Joel F. Houston, Fundamentals of Financial Management (Concise Fourth Edition, Thomson South-Western), at 317 (emphasis added).

15 See for example, Bureau of Technical Utility Services Report on the Quarterly Earnings of Jurisdictional Utilities for the Year Ended June 30, 2025, Docket No. M-2025-3057215 (October 23, 2025).

Technical Utility Services employs the 5-year earnings growth rates from the same sources (i.e., Value Line, Zacks, and S&P) to the dividends per share of each of the companies in its barometer, or proxy, group as I employ in my Constant Growth DCF.

Q. ARE OTHER SOURCES OF DIVIDEND GROWTH AVAILABLE TO INVESTORS?

A. Yes, although that does not mean that investors incorporate such estimates into their investment decisions. Academic studies suggest that investors base their investment decisions on analysts' expectations of growth in earnings.[16] I am not aware of any similar findings regarding non-earnings-based growth estimates. In addition, the only forward-looking growth rates that are available on a consensus basis are analysts' EPS growth rates. The fact that earnings growth projections are the only widely accepted estimates of growth provides further support that earnings growth is the most meaningful measure of growth among the investment community.

Q. WHAT ARE THE RESULTS OF YOUR CONSTANT GROWTH DCF ANALYSIS?

A. The results of my Constant Growth DCF analysis are provided in Exhibit JCN-4 and summarized in Figure 9.

16 *See*, e.g., Harris and Marston, *Estimating Shareholder Risk Premia Using Analysts Growth Forecasts*, Financial Management, Summer 1992, at 65; and Vander Weide and Carleton, *Investor Growth Expectations: Analysts vs. History*, The Journal of Portfolio Management, Spring 1988, at 81. Please note that while the original study was published in 1988, it was updated in 2004 under the direction of Dr. Vander Weide. The results of that updated study are consistent with Vander Weide and Carleton's original conclusions.

FIGURE 9: CONSTANT GROWTH DCF RESULTS

	Mean Low	Median	Mean	Mean High
30-day average	10.51%	10.64%	11.46%	12.21%
90-day average	10.65%	10.68%	11.60%	12.35%
180-day average	10.74%	10.79%	11.69%	12.45%

Q. HOW DID YOU CALCULATE THE MEAN HIGH, MEAN LOW, AND OVERALL MEAN DCF RESULTS?

A. I calculated the Mean High DCF result using the maximum growth rate (i.e., the maximum of the S&P Capital IQ, Value Line, and Zacks EPS growth rates) in combination with the expected dividend yield for each of the proxy group companies. I used a similar method to calculate the Mean Low DCF results, using the minimum growth rate for each company. The Mean results reflect the average growth rate from each source for each company in combination with the expected dividend yield.

B. CAPM Analysis

Q. PLEASE BRIEFLY DESCRIBE THE GENERAL FORM OF THE CAPITAL ASSET PRICING MODEL.

A. The CAPM is a risk premium approach that estimates the cost of equity for a given security as a function of a risk-free return plus a risk premium (to compensate investors for the non-diversifiable or "systematic" risk of that security).[17] As shown

17 Systematic risks are fundamental market risks that reflect aggregate economic measures and therefore cannot be mitigated through diversification. Unsystematic risks reflect company-specific risks that can be mitigated and ultimately eliminated through investments in a portfolio of companies and/or market sectors.

in Equation [3], the CAPM is defined by four components, each of which must theoretically be a forward-looking estimate:

$$K_e = r_f + \beta(r_m - r_f) \qquad [3]$$

Where:

K_e = the required ROE for a given security;

r_f = the risk-free rate of return;

β = the Beta of an individual security; and

r_m = the required return for the market as a whole.

The term $(r_m - r_f)$ represents the Market Risk Premium (MRP). According to the theory underlying the CAPM, since unsystematic risk can be diversified away, investors should be concerned only with systematic or non-diversifiable risk. Non-diversifiable risk is measured by Beta, which is defined as:

$$\beta = \frac{Covariance(r_e, r_m)}{Variance(r_m)} \qquad [4]$$

Where:

r_e = the rate of return for the individual security or portfolio.

The variance of the market return, noted in Equation [4], is a measure of the uncertainty of the general market, and the covariance between the return on a specific security and the market reflects the extent to which the return on that security will respond to a given change in the market return. Thus, Beta represents the risk that the selected security will not be effective in diversifying systematic market risks.

Q. WHAT RISK-FREE RATE DID YOU USE IN YOUR CAPM ANALYSIS?

A. I considered three estimates of the expected risk-free rate: (1) the current 30-day average yield on 30-year U.S. Treasury bonds (i.e., 4.66 percent);[18] (2) the projected 30-year U.S. Treasury bond yield for Q1 2026 through Q1 2027 (i.e., 4.60 percent);[19] and (3) the projected 30-year U.S. Treasury bond yield for 2027 through 2031 (i.e., 4.60 percent).[20] It is important to consider both current and projected bond yields. Using the 5-year forecast of bond yields helps alleviate any short-term market factors affecting the risk-free rate, or "r_f" in the CAPM formula. It is also important to recognize that NFGDC is financing long-lived assets, and the cost of capital should be forward looking to reflect that perspective.

Q. WHAT MEASURES OF BETA DID YOU USE IN YOUR CAPM ANALYSIS?

A. As shown in Exhibit JCN-6, I utilized two measures of Beta for the proxy group companies: (1) the reported Beta coefficients from Bloomberg (which are calculated using ten years of weekly data against the S&P 500 Index); and (2) the reported Beta coefficients from Value Line (which are calculated using five years of weekly data against the New York Stock Exchange Composite Index).

Q. WHAT MARKET RISK PREMIUM DID YOU USE IN YOUR CAPM ANALYSIS?

A. Consistent with the approach adopted by FERC, I used the Constant Growth DCF model to estimate the market capitalization-weighted total market return for the

18 Bloomberg Professional, as of November 28, 2025.

19 Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025, at 2.

20 Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025, at 14.

S&P 500 Index, using projected earnings growth rates and dividend yields. As shown in Exhibit JCN-5, to calculate the Constant Growth DCF estimate for each company in the S&P 500, I relied on dividend yields as of November 28, 2025, as reported by S&P Capital IQ, and projected EPS growth rates from Value Line. In my initial analysis, I included all companies in the S&P 500. When investors purchase the S&P 500 Index or a mutual fund or exchange traded fund that mirrors the S&P Index, their total return is based on the returns for all 500 companies in the S&P Index. As such, this methodology provides the best indication as to the expected return for the overall market using the S&P 500 as a proxy. Applying this methodology suggests an expected market return of 15.09 percent. However, I applied FERC's more conservative convention to consider only a subset of S&P 500 companies with growth rates that are between 0 percent and 20 percent. This methodology suggests an expected market return of 11.62 percent.

Q. WHAT ARE THE RESULTS OF YOUR CAPM ANALYSES?

A. The results of my CAPM analysis are provided in Exhibit JCN-6 and summarized in Figure 10.

FIGURE 10: PROXY GROUP AVERAGE CAPM RESULTS

	CAPM Result
Value Line Beta Coefficients	
Current Risk-Free Rate	11.30%
2026-27 Projected Risk-Free Rate	11.29%
2027-31 Projected Risk-Free Rate	11.29%
Bloomberg Beta Coefficients	
Current Risk-Free Rate	11.09%
2026-27 Projected Risk-Free Rate	11.07%
2027-31 Projected Risk-Free Rate	11.07%

C. Risk Premium Analysis

Q. PLEASE DESCRIBE THE RISK PREMIUM APPROACH THAT YOU USED.

A. In general terms, this approach recognizes that equity is riskier than debt because equity investors bear the residual risk associated with ownership. Equity investors, therefore, require a greater return (i.e., a premium) than would a bondholder. The Risk Premium approach estimates the cost of equity as the sum of the Equity Risk Premium and the yield on a particular class of bonds.

$$\text{ROE} = RP + Y \qquad [5]$$

Where:

RP = Risk Premium (difference between allowed ROE and the 30-Year Treasury Yield); and
Y = Applicable bond yield.

Since the equity risk premium is not directly observable, it is typically estimated using a variety of approaches, some of which incorporate *ex-ante*, or forward-looking, estimates of the cost of equity and others that consider historical,

or *ex-post*, estimates. For my Risk Premium analysis, I have relied on authorized returns from a large sample of natural gas utility companies.

Q. WHAT DID YOUR RISK PREMIUM ANALYSIS INDICATE?

A. To estimate the relationship between risk premia and interest rates, I conducted a regression analysis using the following equation:

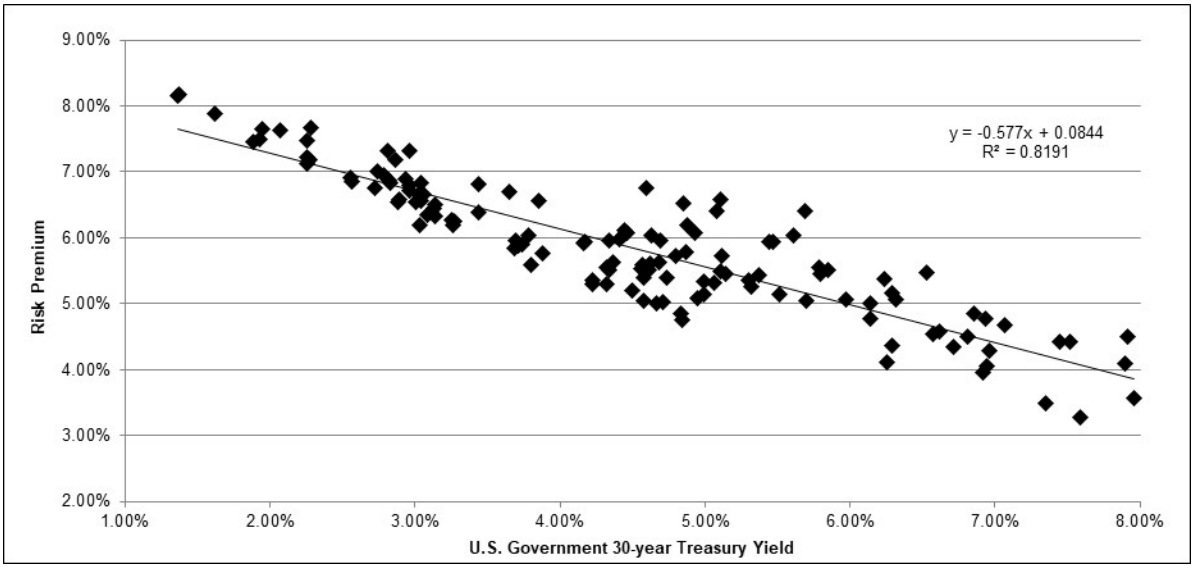
$$RP = a + (b \times Y) \qquad [6]$$

where:

RP = Risk Premium (difference between allowed ROEs and the 30-Year Treasury Yield);
a = Intercept ter*m;*
b = Slope term; and
Y = 30-Year Treasury Yield.

Data regarding allowed ROEs were derived from 863 natural gas utility company rate cases from January 1, 1992, through November 28, 2025, as reported by Regulatory Research Associates.

FIGURE 11: RISK PREMIUM RESULTS



As illustrated by Figure 11 above, the risk premium varies with the level of bond yield, and generally increases as the bond yields decrease, and vice versa. In order to apply this relationship to current and expected bond yields, I consider three estimates of the 30-year Treasury yield, including the current 30-day average, a near-term Blue Chip consensus forecast for Q1 2026 – Q1 2027, and a Blue Chip consensus forecast for 2027–2031. Based on the regression coefficients in Exhibit JCN-7, which allow for the estimation of the risk premium at varying bond yields, the results of my Risk Premium analysis are shown in Figure 12 below.

FIGURE 12: RISK PREMIUM RESULTS USING 30-YEAR TREASURY YIELD

	30-Day Average Yield on 30-Year Treasury Bond	Q1 2026–Q1 2027 Forecast for Yield on 30-Year Treasury Bond[21]	2027-2031 Forecast for Yield 30-Year Treasury Bond[22]
Yield	4.66%	4.60%	4.60%
Risk Premium	5.76%	5.79%	5.79%
Resulting ROE	10.41%	10.39%	10.39%

D. Evaluating Model Results

Q. PLEASE EXPLAIN HOW YOU CONSIDERED THE RESULTS OF THE DCF, CAPM, AND RISK PREMIUM ANALYSES TO ARRIVE AT YOUR ROE RECOMMENDATION.

A. As shown in Figure 13, I have considered the results of the DCF, CAPM, and Risk Premium analyses. For the DCF result, I included the average of the 30-day, 90-day, and 180-day analyses. For the CAPM result, I relied on the average of current

21 Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025, at 2.
22 Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025, at 14.

and projected Treasury yields, the average of Value Line and Bloomberg Betas coefficients, and the MRP derived from a subset of the S&P 500 companies. For the Risk Premium analysis, I relied on the average of current and projected Treasury yields.

FIGURE 13: BASE ROE RESULTS

	Average	Median
DCF Result	11.58%	10.70%
CAPM Result	11.19%	11.13%
Risk Premium	10.40%	10.40%
Average	**11.06%**	**10.92%**

As discussed in the next Section of my testimony, these estimates serve as a base prior to consideration of the relative business and financial risks of NFGDC as compared to the proxy companies.

VII. BUSINESS RISKS AND OTHER CONSIDERATIONS

Q. ARE THERE FACTORS SPECIFIC TO THE COMPANY'S RISK PROFILE THAT YOU HAVE ALSO CONSIDERED IN DEVELOPING YOUR ROE RECOMMENDATION?

A. Notwithstanding the care taken to establish a risk-comparable group of proxy companies and to consider the results of multiple analytical approaches, market expectations with respect to future risks and growth opportunities will vary from company to company. Therefore, the Company's business risks must also be taken

into consideration when determining where the Company's cost of equity falls within the range of results. As discussed in more detail below, I considered the Company's (1) capital expenditure plan; (2) significantly smaller size compared to the proxy companies; (3) customer concentration risk; and (4) regulatory risk relative to the proxy group companies.

A. Capital Expenditure Program

Q. PLEASE DISCUSS NFGDC'S CAPITAL EXPENDITURE PROGRAM.

A. The Company's long-standing focus on distribution system safety and reliability drives its capital expenditure program. As indicated in the Company's recent earnings presentation, NFGDC plans to spend between $185 and $205 million on total capital expenditures in 2026. In 2025, the Company spent approximately 78 percent (or $147.7 million) of total capital expenditures on safety and reliability improvements.[23] These expenditures include utility main pipeline replacement, modernization of its gas system, and emissions reductions.

As with any utility facing capital expenditure requirements, the Company's risk profile is affected in two significant and related ways: (1) an elevated level of capital investment increases the risk of under-recovery or delayed recovery of the invested capital; and (2) an inadequate return would put downward pressure on key credit metrics. The Company's capital spending program will put significant pressure on the Company's need to raise capital, and the terms will have lasting impacts for the Company's customers.

23 National Fuel Investor Presentation, Fiscal 2025 – 4th Quarter and Full year Update, November 5, 2025.

Q. DO CREDIT RATING AGENCIES RECOGNIZE THE RISKS ASSOCIATED WITH ELEVATED LEVELS OF CAPITAL EXPENDITURES?

A. Yes. From a credit perspective, the additional pressure on cash flows associated with higher levels of capital expenditures exerts corresponding pressure on credit metrics and, therefore, credit ratings. Moody's explains the implications of large capital expenditure programs on utilities' credit profiles and notes that "[h]igh capital expenditures were a key driver of most of [Moody's] negative rating actions" in 2024:[24]

> Credit pressure is emerging most acutely for companies with large, complex or multiyear projects or for those that are experiencing a delay in the recovery of investment costs. Unlike exogenous events of recent years – such as severe storms, commodity price spikes and the COVID-19 pandemic, which we viewed as temporary events – capital spending and related financings are core long-term financial policy issues. As such, we are not regarding them as temporary and believe they will likely continue to lead to negative rating actions if not sufficiently mitigated.[25]

S&P explains the importance of regulatory support for large capital projects:

> When applicable, a jurisdiction's willingness to support large capital projects with cash during construction is an important aspect of our analysis. This is especially true when the project represents a major addition to rate base and entails long lead times and technological risks that make it susceptible to construction delays. Broad support for all capital spending is the most credit-sustaining. Support for only specific types of capital spending, such as specific environmental projects or system integrity plans, is less so, but still favorable for creditors. Allowance of a cash return on construction work-in-progress or similar ratemaking methods historically were extraordinary measures for use in unusual circumstances, but when construction costs are rising, cash flow support could be crucial to

24 Moody's Ratings, Electric and Gas Utilities – US Sector In-Depth, "High capital spending will weigh on credit quality without supportive company actions," at 3 (October 21, 2024).

25 *Id*., at 2.

> maintain credit quality through the spending program. Even more favorable are those jurisdictions that present an opportunity for a higher return on capital projects as an incentive to investors.[26]

The utility's ability to recover its full cost of operations and business, including the costs to maintain and improve its system, is a critical factor in the assessment of its financial strength and creditworthiness. For investors, these considerations factor into the overall perception of risk and consequently, the return required to compensate for this risk. To provide continuous safe and reliable service, maintaining access to capital markets on favorable terms is critical for utilities and their customers, especially during periods of significant capital investment.

Q. WHAT IS YOUR CONCLUSION REGARDING HOW NFGDC'S PROJECTED CAPITAL EXPENDITURE PROGRAM AFFECTS THE COMPANY'S RISK PROFILE AND COST OF EQUITY?

A. My primary conclusion is that NFGDC's capital expenditure program is a testament to the Company's commitment to improving its infrastructure in order to provide reliable and safe operations to its customers. The Company's capital spending program places pressure on internal cash flows and credit metrics, and will require the company to maintain access to capital markets on favorable terms and conditions. For these reasons, it is important that the authorized ROE be set at a level that allows NFGDC to continue to attract both debt and equity under favorable terms regardless of the economic and financial market conditions.

26 S&P Global Ratings, "Assessing U.S. Investor-Owned Utility Regulatory Environments," August 10, 2016, at 7.

B. Small Size Risk

Q. HOW DOES THE COMPANY'S SMALL SIZE AFFECT ITS RISK PROFILE AND COST OF EQUITY?

A. The small size of NFGDC relative to the proxy group companies is an important risk factor in determining the Company's cost of equity. Smaller companies generally are thought to be riskier than larger companies, and thus investors require a higher return for investment in smaller firms. That higher return requirement is known as the "size premium." Academic literature recognizes that smaller companies tend to be rewarded with higher total returns than larger companies, even after the relative illiquidity of smaller company stock is taken into account. Exhibit JCN-8 shows NFGDC's implied market capitalization relative to the proxy group companies. By applying the proxy group median market-to-book ratio of 1.61 to NFGDC's historical test year book equity balance of $768 million, the Company's implied market capitalization is $1.24 billion, or 23.92 percent of the proxy group median market capitalization of $5.17 billion.

NFGDC's small size relative to the proxy group companies indicates that the Company's earnings and cash flows may be disproportionately affected by circumstances such as the loss of large customers as well as general macroeconomic conditions in the service territory. Similarly, capital expenditures for non-revenue producing investments such as system maintenance and replacements will put proportionately greater pressure on the Company's cost of service. Taken together, these risks affect the return required by investors for smaller companies. While I recognize that as a wholly-owned subsidiary of National Fuel Gas NFGDC may

have some protection from such external shocks, on a stand-alone basis the Company is relatively small as compared to the proxy group companies used for the ROE analysis. This small size magnifies the effect of other business and financial risks on the Company.

Q. WHY IS IT IMPORTANT TO CONSIDER THE RISK ASSOCIATED WITH NFGDC'S SMALL SIZE EVEN THOUGH IT IS A SUBSIDIARY OF A LARGER ENTITY?

A. The widely accepted "stand-alone" regulatory principle treats each utility subsidiary as its own company. Parent entities (whether publicly or privately owned) like other investors, have capital constraints and must look at the attractiveness of the expected risk-adjusted return of each investment alternative in their capital budgeting process. The opportunity cost concept applies regardless of the source of the funding. When funding is provided by a parent entity, the return still must be sufficient to provide an incentive to allocate equity capital to the subsidiary or business unit rather than other internal or external investment opportunities. That is, the regulated subsidiary competes for capital with the parent company's affiliates, and with other similarly situated utility companies. In that regard, investors value corporate entities on a sum-of-the-parts basis and expect each division within the parent company to provide an appropriate risk-adjusted return. It therefore is important that the authorized ROE reflects the risks and prospects of the utility's operations and supports the utility's financial integrity from a stand-alone perspective. From that perspective, the fact that NFGDC is a

subsidiary of National Fuel Gas is not relevant to the consideration of the risk associated with NFGDC's small size.

Q. DO CREDIT RATING AGENCIES CONSIDER SMALL SIZE AS A DISTINGUISHING RISK FACTOR?

A. Yes. Moody's, for example, considers the size and diversity of utility operations to be a distinguishing factor that makes some utilities riskier than others. In discussing its rating methodology for regulated electric and gas utilities, Moody's states:

> In assessing market position, we consider the economic diversity of the utility's service territory and the diversity of its regulatory regimes, as well as the size and scale of a utility's operations. We also consider the diversity of utility operations (e.g., regulated electric, gas, water, steam) where there are material operations in more than one area.
>
> Economic diversity is typically a function of the population, size and breadth of the territory and the businesses that drive its gross domestic product (GDP) and employment. For the size of the territory, we typically consider the number of customers and the volume of generation and/or throughput. For breadth, we consider the number of sizable metropolitan areas served, the economic diversity and vitality in those metropolitan areas, and any concentration in a particular area or industry. In our assessment, we may consider various information sources. We also consider the mix of the utility's sales volumes among customer types, as well as the track record of volume sales and any notable payment patterns during economic cycles. For diversity of regulatory regimes, we typically look at the number of regulators and the percentages of revenues and utility assets that are under the purview of each. Issuers regulated in multiple jurisdictions typically receive the highest scores in the Market Position sub-factor. Where there is only one regulator, we make a differentiation of regimes perceived as having lower or higher volatility. Size of the utility is also considered, since a larger utility can better absorb the impact of temporary, or one-time, adverse events.[27]

27 Moody's Investor Service, Rating Methodology, Regulated Electric and Gas Utilities, August 6, 2024, at 12.

NFGDC's smaller size increases its financial and business risks relative to the proxy group companies. While I did not make a specific adjustment to the ROE recommendation to account for this increased risk, it is an important consideration in setting the ROE within the recommended range to compensate investors for this increased risk.

Q. WHAT IS YOUR CONCLUSION REGARDING HOW THE COMPANY'S SMALL SIZE AFFECTS THE COMPANY'S RETURN ON EQUITY?

A. My conclusion is that NFGDC is comparatively smaller than the proxy group companies and the smaller size represents an incremental risk. While I have not made a specific adjustment to reflect the Company's small size, the risk associated with small size indicates that NFGDC's cost of equity is higher than the midpoint of the range of proxy group results.

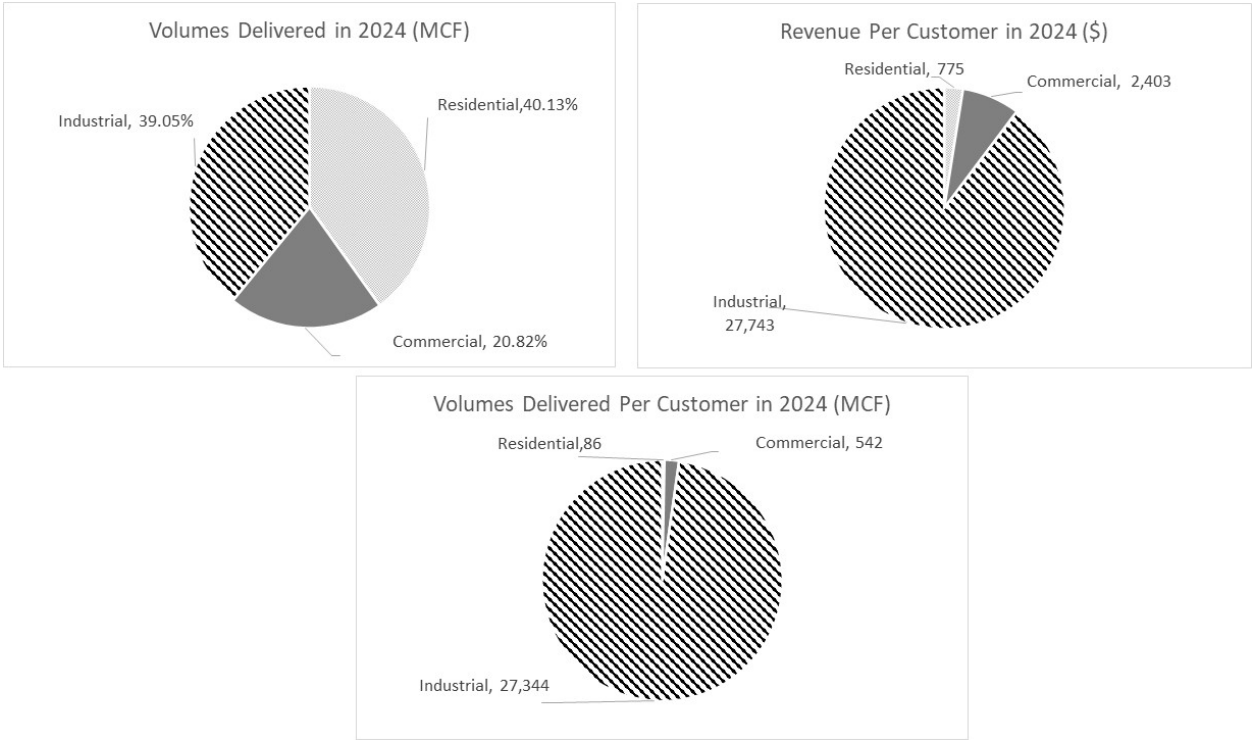
C. Customer Concentration Risk

Q. DOES NFGDC FACE ADDITIONAL BUSINESS RISKS RELATED TO ITS NATURAL GAS OPERATIONS?

A. Yes, it does. As a natural gas distribution company, NFGDC faces risks related to evolving customer trends, competition from alternative energy sources, and federal and state regulatory requirements. Moreover, NFGDC's position as a supplier for residential, industrial, and commercial customers exposes the Company's operations to macroeconomic and local economic conditions that influence the demand for its product. Particularly, the Company's customer concentration risk is highly pronounced in serving the industrial and manufacturing customers in Pennsylvania. Manufacturing has consistently been one of the largest contributors

to Pennsylvania's state Gross Domestic Product ("GDP"), although its overall contribution has declined since the early 2000s.[28] As shown in Figure 14, from the Company's perspective, approximately 40 percent of the Company's 2024 total volumes in Pennsylvania were derived from industrial customers.[29] Industrial sales are also of significance to the Company's financial viability as industrial customers represent the highest volume and revenue *per* customer. In other words, the loss of industrial customers presents elevated risk to the Company's financial health and investors' perception of business risk, especially for a small sized utility, as discussed in the prior section.

FIGURE 14: CUSTOMER CONCENTRATION[30]



28 Bureau of Economic Analysis, Series SAGDP2 (2010-2024).

29 Source: Gas Annual Report submitted to Pennsylvania Public Utility Commission for National Fuel Gas Distribution Corp, for the year ended December 31, 2024.

30 *Id.*

Q. WHY DOES CUSTOMER CONCENTRATION INCREASE BUSINESS RISK?

A. Customer concentration exposes the Company to increased business risk due to loss of large volumes and revenues associated with the loss of any single customer. This risk is especially pronounced during periods of high economic and business uncertainty such as the current dynamic with respect to inflation, interest rates, and global geopolitical tensions. If a large industrial customer goes out of business or significantly reduces its gas demand, a significant portion of the Company's revenues will be lost. Furthermore, since the Company's distribution revenue recovers fixed costs, which the Company continues to bear regardless of the volumes delivered, NFGDC will not be able to recover those costs and consequently underearn. These risks are highlighted by Dhaliwal, Judd, Serfling, and Shaikh:

> Depending on a major customer for a large portion of sales can be risky for a supplier for two primary reasons. First, a supplier faces the risk of losing substantial future sales if a major customer becomes financially distressed or declares bankruptcy, switches to a different supplier, or decides to develop products internally. Consistent with this notion, Hertzel et al. (2008) and Kolay et al. (2015) document negative supplier abnormal stock returns to the announcement that a major customer declares bankruptcy. Further, a customer's weak financial condition or actions could signal inherent problems about the supplier's viability to its remaining customers and lead to compounding losses in sales. Second, a supplier faces the risk of losing anticipated cash flows from being unable to collect outstanding receivables if the customer goes bankrupt. This assertion is consistent with the finding that suppliers offering customers more trade credit experience larger negative abnormal stock returns around the announcement of a customer

filing for Chapter 11 bankruptcy (Jorion and Zhang, 2009; Kolay et al., 2015.[31]

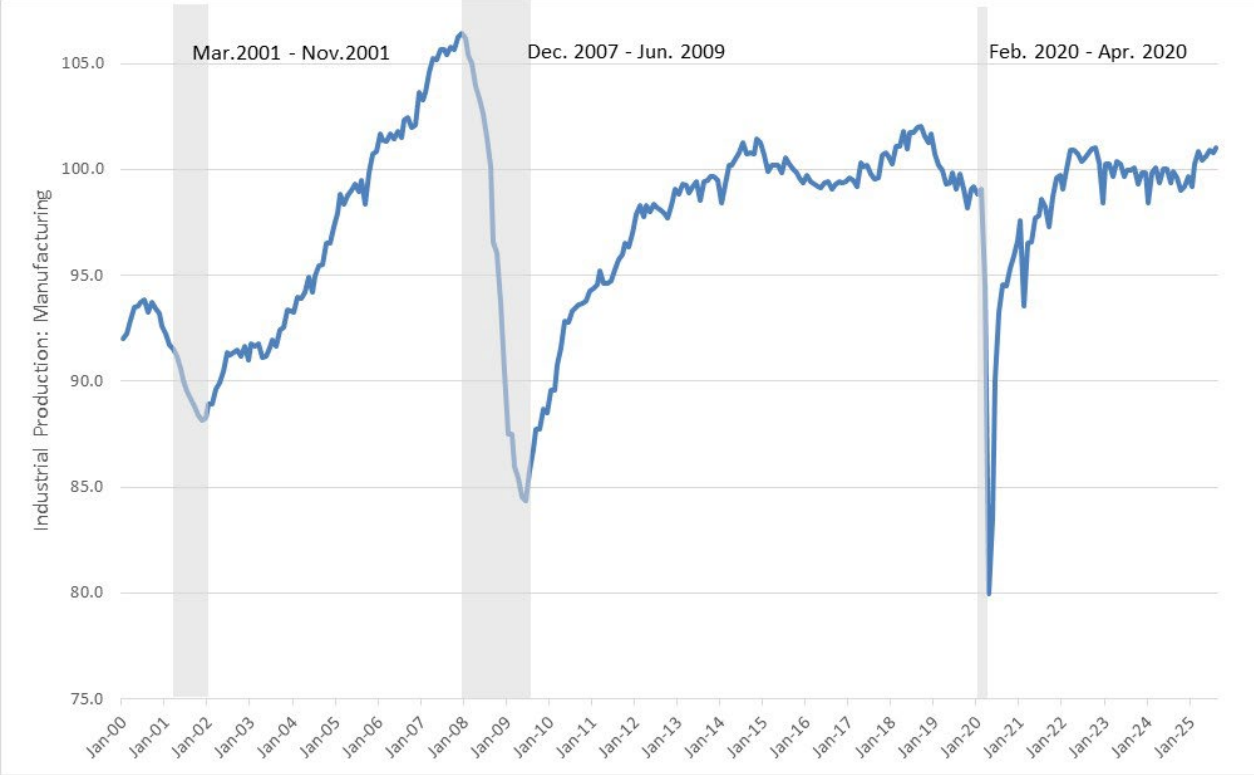
This, in turn, will reduce investor confidence in the Company's financial viability, may impact its credit ratings, and further increase capital costs.

Q. HOW WOULD INDUSTRIAL NATURAL GAS DEMAND BE IMPACTED BY AN ECONOMIC DOWNTURN?

A. Chemical and steel manufacturing, the primary industrial customers served by NFGDC, are closely aligned with the general demand of consumer and durable products, such as cars, appliances, buildings, and other machinery. When the economy slows, or there is growing consumer uncertainty, the demand for manufacturing these products eventually slows. This slowdown in manufacturing further extends into the demand for natural gas supply by manufacturing plants. This is evident in the declines in the industrial segment during each of the recessions in recent years, as shown in Figure 15 below:

31 Dan S. Dhaliwal, J. Scott Judd, Matthew A. Serfling, and Sarah Shaikh, *Customer Concentration Risk and the Cost of Equity Capital*, SSRN Electronic Journal (2016): 1-2. Web.

FIGURE 15: U.S. INDUSTRIAL PRODUCTION IN MANUFACTURING ACROSS ECONOMIC CYCLES[32]



As evident in the figure above, industrial production in manufacturing declined significantly during economic downturns (i.e., March 2001 – November 2011; December 2007 – June 2009; and February 2020 – April 2020). These downturns directly impacted energy demand, as evidenced by the U.S. Energy Information Administration's ("EIA") Short-Term Energy Outlook in January 2010:

> EIA estimates that total natural gas consumption fell by 1.5 percent in 2009, primarily because of the economic downturn. Despite low natural gas prices throughout most of 2009, which contributed to a significant increase in natural gas-fired electric power generation, declines in industrial, residential, and commercial sector

32 Source: FRED St. Louis, Industrial Production: Manufacturing (IPMAN).

consumption drove the year-over-year decline in total consumption.[33]

Given economic volatility and uncertainty coupled with the Company's significantly small size, NFGDC's customer concentration exposes the Company to significant risk related to natural gas demand, particularly industrial customers that comprise a significant portion of the Company's total volumes and revenues.

D. Regulatory Framework and Relative Risk

Q. PLEASE EXPLAIN HOW CREDIT RATING AGENCIES CONSIDER THE REGULATORY FRAMEWORK IN ESTABLISHING A COMPANY'S CREDIT RATING.

A. Moody's, S&P, and Fitch all consider the overall regulatory framework in establishing credit ratings. As shown Figure 16, Moody's establishes credit ratings based on four key factors:

FIGURE 16: MOODY'S RATING FACTORS

Factor	Weighting
Regulatory Framework	25%
Ability to Recover Costs and Earn Returns	25%
Diversification	10%
Financial Strength	40%
Total	100%

Two of these factors (*i.e.*, regulatory framework and the ability to recover costs and earn returns) are based on the regulatory environment; thus, half of

33 U.S. Energy Information Administration, Short-Term Energy Outlook, January 12, 2010 Release.

Moody's overall assessment of business and financial risk for regulated utilities is based on the regulatory environment.[34] Similarly, S&P has identified the regulatory environment as an important factor, stating, "we believe the fundamental regulatory environment in the jurisdictions in which a utility operates often influence credit quality the most."[35] Fitch emphasized the importance of the regulatory environment as follows:

> A benign and supportive regulatory environment could support a rating uplift, all other conditions being equal, even when credit metrics are not in line with those of the relative rating level. Conversely, an extended period of adverse or penalizing regulatory actions could lead to lower ratings given regulatory constructs often tend to be sticky and could take a long time to turn around.[36]

Q. HOW DOES NFGDC'S REGULATORY FRAMEWORK COMPARE TO ITS PEER UTILITIES?

A. I have undertaken a review of regulatory mechanisms designed to mitigate certain business risks, and they support treating the results from the proxy group I selected as representative of the business risk of a prudently managed regulated gas utility like NFGDC. The results of my analysis are presented in Exhibit JCN-9. Specifically, I examined the following elements of cost-recovery that affect the regulatory risk of the Company and the proxy group companies: (1) test year convention; (2) rate base convention; (3) revenue decoupling; and (4) capital cost recovery.

34 Moody's Investor Service, Rating Methodology, Regulated Electric and Gas Utilities, August 6, 2024, at 2.

35 Standard & Poor's, *Assessing U.S. Utility Regulatory Environments*, March 11, 2010, at 2.

36 Fitch Ratings, *U.S. Utilities, Power and Gas Ratings Navigator Companion Special Report*, February 9, 2015, at 3.

Similar to 41.67 percent of the proxy group companies, NFGDC has a forecasted rate base convention. In addition, NFGDC has a year-end rate base convention, which is similar to 58.33 percent of the proxy group companies. While 90.91 percent and 70.83 percent of the proxy group companies have revenue decoupling and capital cost recovery mechanisms, NFGDC has only a partial revenue decoupling mechanism and a capped capital cost recovery mechanism. Specifically, its weather normalization, which was effective starting October 2023, is subject to a 3 percent deadband, and the Distribution System Improvement Charge ("DSIC"), initiated on January 1, 2025, is limited to 5 percent of billed distribution revenues. My conclusion is that while NFGDC has somewhat elevated regulatory risk due to the limitations on its partial revenue decoupling and capital cost recovery mechanisms, I do not make a specific adjustment to the ROE recommendation.

VIII. CAPITAL STRUCTURE

Q. WHAT IS NFGDC'S PROPOSED CAPITAL STRUCTURE?

A. As summarized in the direct testimony of James C. Welch, National Fuel Statement No. 11, the Company capital structure at the end of the FPFTY is projected to be comprised of 56.4 percent common equity and 43.6 percent long-term debt. The Company is proposing to use this capital structure in this proceeding.

Q. HOW HAVE YOU ASSESSED THE REASONABLENESS OF NFGDC'S PROPOSED CAPITAL STRUCTURE WITH RESPECT TO THE PROXY GROUP?

A. The proxy group has been selected to reflect comparable companies in terms of business and financial risks. Therefore, it is appropriate to compare the financial capital structures operating utilities of the proxy group companies to the financial capital structure proposed by the Company in order to assess whether the Company's capital structure is reasonable and consistent with industry standards for companies with commensurate risk. I calculated the weighted average capital structures for each of the proxy group operating companies for the period 2022 to 2024. Exhibit JCN-10 shows that the Company's proposed common equity ratio of 56.4 percent is within the range of actual common equity ratios of 46.51 percent to 60.16 percent for the operating companies held by the proxy group over this period.

Q. BASED ON THE INFORMATION YOU HAVE PRESENTED, WHAT IS THE FAIR RATE OF RETURN THAT SHOULD BE ALLOWED THE COMPANY?

A. As shown in Figure 17 below, based on the components discussed above, along with my ROE recommendation of 11.25 percent, the Company should be allowed an overall ROR of 8.78 percent.

FIGURE 17: OVERALL RATE OF RETURN

	Ratio	Cost	Weighted Cost Rate
Debt	43.6%	5.58%	2.44%
Common Equity	56.4%	11.25%	6.34%
TOTAL	100.0%		8.78%

IX. CONCLUSION

Q. WHAT IS YOUR CONCLUSION REGARDING A FAIR ROE FOR NFGDC?

A. Based on the quantitative analyses provided in my Direct Testimony, I have established a range of ROE results shown previously in Figure 1 (also see Exhibit JCN-2). I consider an ROE range of 10.30 percent to 11.30 to be reasonable. From within that range, and considering the Company's risk profile and the management's exceptional efficiency, I recommend an ROE of 11.25. My ROE recommendation considers an 11.00 percent base ROE as well as a 25-basis point management efficiency premium.

Q. WHAT IS YOUR RECOMMENDATION WITH REGARD TO NFGDC'S OVERALL RATE OF RETURN, INCLUDING ITS CAPITAL STRUCTURE IN THIS PROCEEDING?

A. I recommend that the Commission authorize an overall rate of return of 8.78 percent for NFGDC based on a capital structure consisting of 56.40 percent equity and 43.6 percent long-term debt.

Q. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?

A. Yes, it does.

NATIONAL FUEL EXHIBIT JCN-1

CONCENTRIC ENERGY ADVISORS

JOSHUA C. NOWAK
VICE PRESIDENT

Mr. Nowak is a financial and economic consultant with more than fifteen years of experience in the energy industry. He has provided expert testimony on regulatory issues in several proceedings before the Federal Energy Regulatory Commission (FERC), the Canada Energy Regulator (CER), and regulatory commissions in Alaska, California, Connecticut, Kentucky, Minnesota, New Brunswick, New Hampshire, New Jersey, New York, North Dakota, Ohio, South Dakota, and Texas. Mr. Nowak specializes in providing rate case services on economic conditions and financial market matters related to the cost of capital. He is also experienced in providing strategic direction on financing activities including bond offerings, credit rating analysis, and investor relations. Previously, Josh was the Director of Regulatory Strategy & Integrated Analytics at National Grid where he was responsible for issues related to the cost of capital across its federal and state jurisdictional operating companies. He holds a Bachelor's Degree in Economics and History from Boston College.

REPRESENTATIVE EXPERIENCE

Expert Testimony and Litigation Support

Mr. Nowak's work includes regulatory project management, research, and analysis for expert witness testimony. His work has included:

- Expert testimony on cost of capital, financial markets, return on equity, capital structure, and debt financing issues
- Regulatory strategy in return on equity proceedings, including coordination across several utilities in joint-party proceedings
- Extensive support for expert testimony in cost of capital and return on equity proceedings through research, financial analysis, and testimony development
- Expert testimony, sponsoring lead-lag studies, in support of utility cash working capital requirements
- Project management of expert testimony assignments, including all phases of the regulatory schedule
- Performing analysis to support expert testimony regarding affiliate expenses and allocations

Policy Analysis

Mr. Nowak has contributed to projects related to policy review including:

- A review of natural gas capacity options and a cost-benefit analysis for state regulators seeking to reduce energy costs for ratepayers
- Analysis of the economic and environmental benefits of changes to natural gas ratemaking/expansion policy

Management and Operations Consulting

Mr. Nowak has taken a lead analytical role in developing benchmarking analyses and process reviews. Specifically, he has:

- Developed benchmarking analyses, in support of expert testimony, comparing electric and gas utilities' cost and operational efficiency, taking into account a situational assessment of exogenous factors
- Performed a process review of a gas utility's expansion projects, including an evaluation of policies, procedures, and financial models
- Supported analysis for a report of the reasonableness of a shared service company's administrative and general costs

Financial Analysis

Other financial analysis Mr. Nowak has conducted include:

- Extensive analysis on issues related to utilities' cost of capital
- Developing dispatch models to estimate revenues for merchant powerplants
- Estimating damages for breach of contract in fuel delivery commitment
- Researching strategic investment opportunities for merchant generators
- A report on the profitability of various generation technologies in a deregulated energy market
- Reviewing internal financial models used by utility clients
- Supporting utility asset appraisals, including research and analysis for income approach, cost approach, and sales comparison approach

Other Experience

In his previous work, Mr. Nowak contributed to the evaluation of regulatory policy for government clients. His experience included performing policy analysis, including economic impact assessments, for federal regulations.

PROFESSIONAL HISTORY

Concentric Energy Advisors, Inc. (2018 – Present)
Vice President
Assistant Vice President

National Grid USA (2017 – 2018)
Director, Regulatory Strategy & Integrated Analytics

ScottMadden, Inc. (formerly Sussex Economic Advisors, LLC) (2012 – 2016)
Director
Principal

Concentric Energy Advisors, Inc. (2007 – 2012)
Senior Consultant
Consultant
Assistant Consultant
Analyst

RTI International (2006 – 2007)
Economist

EDUCATION

Boston College
B.A., Economics and History, 2006

SPONSOR	DATE	CASE/APPLICANT	DOCKET	SUBJECT
Regulatory Commission of Alaska				
ENSTAR Natural Gas Company, a Division of Semco Energy, Inc.	06/16	ENSTAR Natural Gas Company, a Division of Semco Energy, Inc.	TA 285-4	Cash Working Capital
California Public Utilities Commission				
Southern California Gas Company	03/25	Southern California Gas Company	A.25-03-011	Return on Equity
San Diego Gas & Electric Company	03/25	San Diego Gas & Electric Company	A.25-03-013	Return on Equity
Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company, and San Diego Gas & Electric Company	02/24	Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company, and San Diego Gas & Electric Company	A.22-04-008 / A.22-04-009 / A.22-04-011 / A.22-04-012	Return on Equity Policy
Southern California Gas Company and San Diego Gas & Electric Company	01/24	Southern California Gas Company and San Diego Gas & Electric Company	A.22-04-011 / A.22-04-012	Return on Equity Policy
Canada Energy Regulator				
South Bow GP (Canada) Ltd.	08/25	South Bow GP (Canada) Ltd.	RH-005-2020	Cost of Capital on Carrying Charges
Connecticut Public Utilities Regulatory Authority				
Yankee Gas Services Company d/b/a Eversource Energy	11/24	Yankee Gas Services Company d/b/a Eversource Energy	Docket No. 24-12-01	Return on Equity
Aquarion Water Company of Connecticut	08/22	Aquarion Water Company of Connecticut	Docket No. 22-07-01	Return on Equity
Aquarion Water Company of Connecticut	01/22	Aquarion Water Company of Connecticut	Docket No. 13-02-20RE06	Return on Equity and Cost of Debt

SPONSOR	DATE	CASE/APPLICANT	DOCKET	SUBJECT
Federal Energy Regulatory Commission				
National Grid LNG LLC	01/25	National Grid LNG LLC	RP25-473-000	Return on Equity
San Diego Gas & Electric Company	10/24	San Diego Gas & Electric Company	ER25-270-000	Return on Equity
Power Authority of the State of New York	10/24	Power Authority of the State of New York	ER25-198-000	Return on Equity
Mid-Atlantic Offshore Development, LLC	07/24	Mid-Atlantic Offshore Development, LLC	ER24-2564-000	Return on Equity
Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, New York State Electric & Gas Corporation, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation	04/21	Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., Niagara Mohawk Power Corporation d/b/a National Grid, New York State Electric & Gas Corporation, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation	EL21-66-000, ER21-1647-000	Transmission Ownership Risk and Returns
Central Hudson Gas & Electric Corporation	12/19	Central Hudson Gas & Electric Corporation	ER20-715-000	Return on Equity
Kentucky Public Service Commission				
Duke Energy Kentucky, Inc.	06/25	Duke Energy Kentucky, Inc.	Case No. 2025-00125	Return on Equity
Duke Energy Kentucky, Inc.	12/24	Duke Energy Kentucky, Inc.	Case No. 2024-00354	Return on Equity
Duke Energy Kentucky, Inc.	12/22	Duke Energy Kentucky, Inc.	Case No. 2022-00372	Return on Equity

SPONSOR	DATE	CASE/APPLICANT	DOCKET	SUBJECT
Minnesota Public Utilities Commission				
Northern States Power Company (Xcel Energy Inc.)	10/25	Northern States Power Company (Xcel Energy Inc.)	G-002/GR-25-356	Return on Equity
Northern States Power Company (Xcel Energy Inc.)	11/24	Northern States Power Company (Xcel Energy Inc.)	E-002/GR-24-320	Return on Equity
Northern States Power Company (Xcel Energy Inc.)	11/23	Northern States Power Company (Xcel Energy Inc.)	G-002/GR-23-413	Return on Equity
New Brunswick Energy and Utilities Board				
New Brunswick Power Corporation (NB Power)	11/22	New Brunswick Power Corporation (NB Power)	Matter 541	Macroeconomic Environment and Capital Market Conditions
Public Utilities Commission of New Hampshire				
Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities	04/16	Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities	Docket No. DE 16-383	Cash Working Capital
New Jersey Board of Public Utilities				
Rockland Electric Company (Consolidated Edison, Inc.)	07/25	Rockland Electric Company (Consolidated Edison, Inc.)	Docket No. ER25060374	Return on Equity

SPONSOR	DATE	CASE/APPLICANT	DOCKET	SUBJECT
New York Public Service Commission				
Consolidated Edison Company of New York, Inc.	01/25	Consolidated Edison Company of New York, Inc.	Case 25-S-0741	Return on Equity
Consolidated Edison Company of New York, Inc.	01/25	Consolidated Edison Company of New York, Inc.	Case 25-E-0072/ Case 25-G-0073	Return on Equity
Central Hudson Gas & Electric Corporation	08/24	Central Hudson Gas & Electric Corporation	Case 24-E-0461/ Case 24-G-0462	Return on Equity
Niagara Mohawk Power Corporation d/b/a National Grid	05/24	Niagara Mohawk Power Corporation d/b/a National Grid	Case 24-E-0322/ Case 24-G- 0323	Return on Equity
National Fuel Gas Distribution Corporation	10/23	National Fuel Gas Distribution Corporation	Case 23-G-0627	Return on Equity
Central Hudson Gas & Electric Corporation	07/23	Central Hudson Gas & Electric Corporation	Case 23-E-0418/ Case 23-G-0419	Return on Equity
The Brooklyn Union Gas Company d/b/a National Grid NY ("KEDNY") and KeySpan Gas East Corporation d/b/a National Grid ("KEDLI")	04/23	The Brooklyn Union Gas Company d/b/a National Grid NY ("KEDNY") and KeySpan Gas East Corporation d/b/a National Grid ("KEDLI")	Case 23-G-0225/ Case 23-G-0226	Return on Equity
Niagara Mohawk Power Corporation d/b/a National Grid	07/20	Niagara Mohawk Power Corporation d/b/a National Grid	Case 20-E-0380/ Case 20-G- 0381	Return on Equity
Niagara Mohawk Power Corporation d/b/a National Grid	07/17	Niagara Mohawk Power Corporation d/b/a National Grid	Case 17-E-0238/ Case 17-G- 0239	Capital Structure and Overall Cost of Capital

SPONSOR	DATE	CASE/APPLICANT	DOCKET	SUBJECT
North Dakota Public Service Commission				
Northern States Power Company (Xcel Energy Inc.)	12/24	Northern States Power Company (Xcel Energy Inc.)	Docket No. PU-24-376	Return on Equity
Northern States Power Company (Xcel Energy Inc.)	12/23	Northern States Power Company (Xcel Energy Inc.)	Docket No. PU-23-367	Return on Equity
Public Utilities Commission of Ohio				
Duke Energy Ohio, Inc.	01/23	Duke Energy Ohio, Inc.	Case No. 22-1153-EL-UNC	Return on Equity
State of Rhode Island Public Utilities Commission				
The Narragansett Electric Co. d/b/a Rhode Island Energy	11/25	The Narragansett Electric Co. d/b/a Rhode Island Energy	Docket No: 25-45-GE	Return on Equity
South Dakota Public Utilities Commission				
Northern States Power Company (Xcel Energy Inc.)	06/25	Northern States Power Company (Xcel Energy Inc.)	Docket No. EL25-024	Return on Equity
Public Utility Commission of Texas				
Wind Energy Transmission Texas, LLC	12/24	Wind Energy Transmission Texas, LLC	Docket No. 52799	Cash Working Capital
Wind Energy Transmission Texas, LLC	05/15	Wind Energy Transmission Texas, LLC	Docket No. 44746	Cash Working Capital
Lone Star Transmission, LLC	05/14	Lone Star Transmission, LLC	Docket No. 42469	Cash Working Capital
Railroad Commission of Texas				
Texas Gas Service Company, a Division of One Gas, Inc.	06/16	Texas Gas Service Company, a Division of One Gas, Inc.	GUD No. 10526	Cash Working Capital

SPONSOR	DATE	CASE/APPLICANT	DOCKET	SUBJECT
Texas Gas Service Company, a Division of One Gas, Inc.	03/16	Texas Gas Service Company, a Division of One Gas, Inc.	GUD No. 10506	Cash Working Capital
Texas Gas Service Company, a Division of One Gas, Inc.	12/15	Texas Gas Service Company, a Division of One Gas, Inc.	GUD No. 10488	Cash Working Capital
CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Entex and CenterPoint Energy Texas Gas	03/14	CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Entex and CenterPoint Energy Texas Gas	GUD No. 10432	Cash Working Capital

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 10-R

Rebuttal Testimony of Joshua C. Nowak

Topics Addressed: Return on Equity

Dated: May 12, 2026

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I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.

A. My name is Joshua C. Nowak. I am employed by Concentric Energy Advisors, Inc. ("Concentric") as Vice President. My business address is 293 Boston Post Road West, Suite 500, Marlborough, Massachusetts 01752.

Q. DID YOU PREVIOUSLY FILE TESTIMONY IN THIS PROCEEDING?

A. Yes. I submitted Direct Testimony on behalf of National Fuel Gas Distribution Corporation ("NFGDC" or the "Company") on January 28, 2026.

Q. ARE YOU SPONSORING ANY EXHIBITS IN THIS PROCEEDING?

A. Yes. My analyses and recommendations are supported by the data presented in Rebuttal Exhibits JCN-1R through JCN-7R, which have been prepared by me or under my direction. I sponsor the following Exhibits:

- JCN-1R – Comprehensive Summary of ROE Results
- JCN-2R – Constant Growth Discounted Cash Flow ("DCF") Analysis
- JCN-3R – Market Risk Premium ("MRP")
- JCN-4R – Capital Asset Pricing Model ("CAPM") Analysis
- JCN-5R – Bond Yield Plus Risk Premium Analysis
- JCN-6R – Mr. Breuning's Corrected CAPM Analysis
- JCN-7R – Mr. Breuning's Adjusted DCF Analysis

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of this Rebuttal testimony is to respond to the Direct Testimony of Drew Breuning on behalf of the Bureau of Investigation and Enforcement ("I&E"), Maureen L. Reno on behalf of the Commonwealth of Pennsylvania Office of Consumer Advocate ("OCA"), and Justin B. Farr on behalf of the Pennsylvania Office of Small Business Advocate ("OSBA"), (collectively "Intervenor Witnesses") as their testimonies relate to the appropriate return on equity ("ROE") or "cost of equity" and capital structure for NFGDC. I also address the Direct Testimony of LeeAnn Wise on behalf of OCA as it relates to the Company's proposed management efficiency adder. In addition, I have updated my cost of capital analysis, incorporating changes in market data and forecasts through the end of March 2026.

Q. HOW IS THE REMAINDER OF YOUR REBUTTAL TESTIMONY ORGANIZED?

A. The remainder of this Rebuttal Testimony is organized as follows: Section II provides a summary of my testimony and discussion of the Intervenor Witnesses' approaches and results. Section III presents the results of my updated ROE analyses based on market data through March 31, 2026. Section IV responds to the Intervenor Witnesses' capital structure recommendations. Section V discusses the Company's proposed management efficiency ROE adder. Section VI discusses economic and capital market conditions and how those conditions are affecting the various models used to estimate the cost of equity for NFGDC. In Sections VII and VIII, I respond to Mr. Breuning's and Ms. Reno's testimonies, respectively, and discuss the proper application of the

various cost of capital models and appropriate inputs to the ROE analyses. Finally, in Section IX, I summarize my key conclusions and recommendations.[1]

II. EXECUTIVE SUMMARY

Q. WHAT ARE YOUR KEY CONCLUSIONS REGARDING THE INTERVENOR WITNESSES' RECOMMENDATIONS ON NFGDC'S COST OF CAPITAL?

A. The key points in my rebuttal testimony are as follows:

1. While Mr. Breuning, Ms. Reno and I agree that the DCF and CAPM approaches are reasonable methods to estimate the cost of equity, Mr. Breuning and Ms. Reno's analytical approaches contain flaws and inconsistencies that, when corrected, produce more reasonable estimates. In Sections VII and VIII, I discuss these areas of disagreement in detail. For example, if Mr. Breuning were to limit his analyses to the DCF and CAPM approaches, along with the application of appropriate inputs, his average CAPM ROE would increase by approximately 190 basis points to a midpoint of 11.18 percent, and his DCF results would increase by approximately 80 basis points to an average of 11.26 percent.

2. Mr. Breuning misplaces the use of benchmarks, such as the national average authorized ROEs for natural gas distribution companies, without any consideration of prevailing capital market conditions, as an analytical methodology to arrive at his ROE recommendation. This represents a departure

[1] The fact that I may not have responded to any particular argument or statement made by the Intervenor Witnesses does not indicate my agreement with that argument or statement.

from his recent testimony in the case of PPL Electric (Docket No. R-2025-3057164), where Mr. Breuning's ROE recommendation was based on the results of his Constant Growth DCF model. Setting aside the theoretical deficiencies of Mr. Breuning's approach, Mr. Breuning, Ms. Reno, and Mr. Farr cite the national average and median authorized ROEs for natural gas distribution companies, but do not provide adequate rationale aligning NFGDC's risk profile to the "average" of all utilities. Authorized ROEs provide valuable information regarding comparable returns to other similarly-situated companies, but must be viewed in the context of the capital market conditions in which they were approved.

3. Several key factors affect the cost of equity for regulated utility companies in current and prospective capital markets, including the interest rate environment and central bank monetary policy, as well as the increasing inflationary pressures amid an increasingly uncertain geopolitical landscape. While Ms. Reno acknowledges that "investors are growing concerned about this persistent inflation particularly since the latest indicators have not fully reflected international oil supply shocks,"[2] Mr. Breuning disagrees on my assessment of the macroeconomic environment and asserts that the Federal Reserve's potential rate cuts in 2026 would "positively impact long-term borrowing rates in the [Company's] FPFTY."[3] As Ms. Reno succinctly states in her Direct Testimony, "[y]ields on short-term Treasury bonds have decreased from

2 Direct Testimony of Maureen L. Reno, at 12.

3 Direct Testimony of Drew Breuning, at 44.

elevated levels in 2023/2024 in response to the FOMC's recent actions. Yields on long-term Treasury bonds and corporate bonds have remained near peak levels."[4] As I discuss in Section VI, Mr. Breuning's assessment is categorically incorrect and his conclusions are inappropriate. More importantly, these challenging macroeconomic circumstances reinforce the importance of considering the results of multiple models, as I have with the CAPM, DCF, and Risk Premium approaches, rather than Mr. Breuning's and Mr. Farr's reliance on static historical average authorized ROEs from prior years when capital markets conditions were considerably different from those we can observe today.

4. Mr. Bruening and Ms. Reno propose hypothetical capital structures based on unfounded assertions that the Company's requested equity ratio is "unreasonable."[5] As discussed further in Section IV, the Company's requested equity ratio is consistent with the range of the proxy group operating company equity ratios and therefore does not comport with any regulatory finding of unreasonableness. Furthermore, Mr. Breuning and Ms. Reno fail to offer adequate evidence to substantiate the use of a hypothetical capital structure.

5. Based on my updated DCF, CAPM, and Risk Premium analyses and considering the Company's risk profile, I continue to recommend a base ROE of 11.00 percent. The Company has withdrawn its request for an additional 25-basis point management efficiency fee due to consideration of the upward

4 Direct Testimony of Maureen L. Reno, at 13.

5 Direct Testimony of Drew Breuning, at 15; Direct Testimony of Maureen L. Reno at 4.

pressures associated with inflation and the impact on customers' bills. In addition, I continue to support NFGDC's requested capital structure of 56.40 percent equity and 43.60 percent debt.

Q. PLEASE SUMMARIZE THE INTERVENOR WITNESSES' COST OF CAPITAL RECOMMENDATIONS.

A. Mr. Breuning's ROE methodologies result in cost of equity estimates that range from 9.25 percent to 10.47 percent. Mr. Breuning recommends an imputed capital structure comprising of 55.00 percent equity and 45.00 percent debt. Mr. Breuning recommends an authorized ROE of 9.81 percent based on the average results of his DCF and CAPM analyses, and the average authorized ROEs for gas distribution companies nationwide from January 2025 through March 11, 2026. Ms. Reno conducts three variations of the DCF analysis resulting in an ROE range of 8.88 percent to 10.61 percent, and her recommended ROE is the midpoint of these results, 9.74 percent. Ms. Reno also employs the CAPM approach as a "check on the reasonableness of [her] DCF results."[6] Ms. Reno's recommended ROE of 9.74 percent is premised on the Commission's adoption of her proposed hypothetical equity ratio of 50.00 percent. Ms. Reno also provides an alternative ROE recommendation of 9.21 percent if the Commission were to grant the Company its actual equity ratio of 56.40 percent.[7] With respect to the Company's cost of debt, both Mr. Breuning and Ms. Reno accept the Company's requested cost of debt of 5.58 percent.[8]

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6 Direct Testimony of Maureen L. Reno, at 7.

7 Direct Testimony of Maureen L. Reno, at 8.

8 Direct Testimony of Drew Breuning, at 21; Direct Testimony Maureen L. Reno, at 7-8.

Q. PLEASE DESCRIBE THE LEGAL STANDARDS THAT MUST BE MET TO ESTABLISH THE AUTHORIZED ROE FOR A REGULATED PUBLIC UTILITY SUCH AS NFGDC.

A. As discussed in my Direct Testimony, the standards for a just and reasonable return established by the United States Supreme Court in the *Hope* and *Bluefield* cases are:

1. Financial Integrity: the return must be adequate to ensure the company's financial soundness and support credit quality;
2. Capital Attraction: the return must be sufficient to enable the company to attract capital on reasonable terms and conditions; and
3. Comparable Return: the return must be comparable to those available to investors in firms with commensurate risk.

Q. MR. BREUNING AND MS. RENO DISCUSS COMMISSIONER BARROW'S COMMENTARY REGARDING THE FINANCIAL IMPACT ON CUSTOMERS OF THE OUTCOME OF THIS RATE CASE.[9] WHAT IS YOUR RESPONSE?

A. Commissioner Barrow's commentary underscores two significant considerations in this proceeding: ensuring that the Company's requested ROE and capital structure comport with the standards established in *Hope* and *Bluefield*, and the impact of the outcome of this proceeding on customers' bills. The ROE and capital structure established in this proceeding must meet the standards discussed above and reflect the Company's actual financial risk and maintain its creditworthiness. I also acknowledge

9 Direct Testimony of Drew Breuning at 17; Direct Testimony of Maureen L. Reno, at 5-6.

that the impact on customers' bills is a significant factor in the Commission's decision in this proceeding. As discussed further in Section V of my testimony, in recognition of the inflationary pressures and impact on customer bills, the Company has taken a meaningful step by withdrawing its request for the 25-basis point management efficiency adder.

Q. ARE THERE OTHER STATEMENTS ISSUED BY THE COMMISSION THAT ARE IMPORTANT TO CONSIDER IN RELATION TO THE OUTCOME OF THIS CASE?

A. Yes, on March 26, 2026, Chairman DeFrank issued a statement regarding NFGDC's petition relating to its Long-Term Infrastructure Improvement Plan ("LTIIP"). Chairman DeFrank not only acknowledged NFGDC consistently meeting its LTIIP mileage replacement targets for leak prone pipe, but regarded the achievement as noteworthy given the price increases the Company experienced from 2023 to 2024. Chairman DeFrank found the Company's "performance in meeting pipeline replacement targets, despite increased costs, to be commendable and worth of recognition." [10] Chairman DeFrank also recognized that increased costs will affect NFGDC's ability to meet pipeline replacement goals going forward. In that regard, it is also important to consider the effect of I&E's and OCA's recommendations on the Company's cash flow. I&E's 9.81 percent ROE recommendation and 55.00 percent equity ratio recommendation would decrease the Company's rate request by more than 35 percent and reduce its cash flow by at least $7 million. OCA's 9.74 percent ROE

10 Pennsylvania, Public Utility Commission, Statement of Chairman Stephen M. DeFrank, Docket No. P-2022-3034957, issued March 26, 2026.

recommendation and 50.00 percent equity ratio recommendation would decrease the Company's rate request by nearly 50 percent and reduce its cash flow by at least $9.5 million. As discussed in my Direct Testimony, an inadequate return will put additional downward pressure on key credit metrics that are already constrained by its capital expenditure program. Decreasing the Company's cash flow by $7 to 9.5 million, will compound the cost pressures recognized by Chairman DeFrank on NFGDC's ability to meet pipeline replacement goals going forward.

Q. PLEASE EXPLAIN WHY MR. FARR'S AND MR. BREUNING'S RELIANCE ON AUTHORIZED ROES TO DETERMINE NFGDC'S ROE IN THIS PROCEEDING IS INAPPROPRIATE.

A. Mr. Breuning[11] and Mr. Farr[12] employ an unconventional, non-analytical approach in their ROE recommendations by relying on the median and average authorized ROEs as a "proxy ROE"[13] to set an inherently forward-looking estimate of investors' required ROEs. While authorized returns can provide valuable information, there are several issues with Mr. Breuning's and Mr. Farr's approaches. First, by relying on the average of nationwide or proxy group companies' authorized ROEs without reference to prevailing macroeconomic conditions or observable market benchmarks, such as those inherent in analytical approaches (*i.e.,* DCF, CAPM, and Risk Premium models), Mr. Farr and Mr. Breuning implicitly disconnect authorized ROEs from broader capital market-based indicators. This approach presumes that regulatory commissions

11 Direct Testimony of Drew Breuning, at 37-38.

12 Direct Testimony of Justin B. Farr, at 4 and Exhibit JBF-5, page 3.

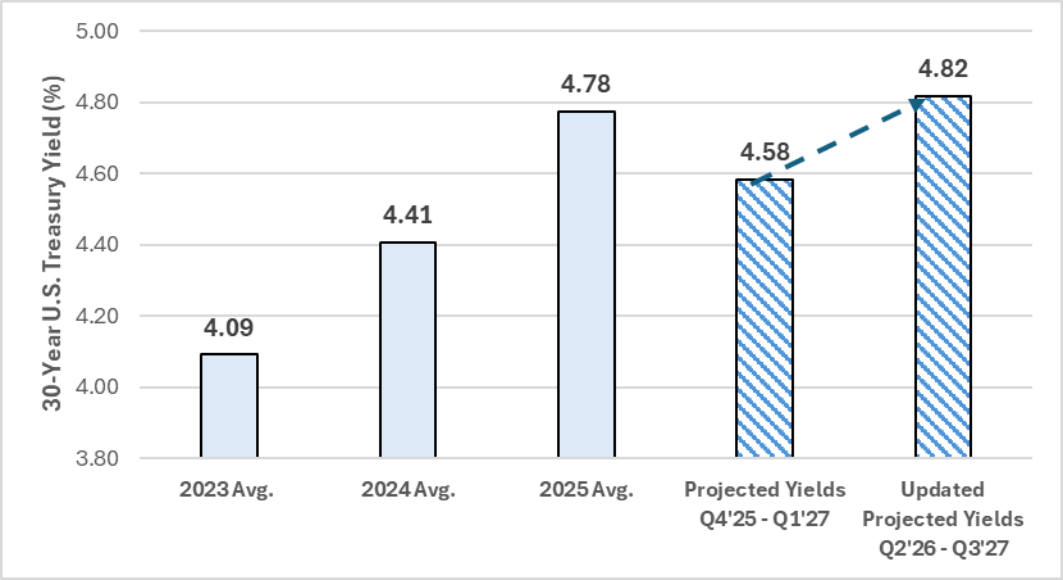
13 Direct Testimony of Justin B. Farr, at 4.

authorize ROEs independently of changing economic and financial conditions over time, an assumption that is inconsistent with both regulatory practice and investor behavior. Notably, Mr. Breuning does not identify the use of the national authorized average as a "commonly presented" methodology for determining the cost of common equity.[14] The 9.70 percent national average ROE for natural gas distribution companies cited by Mr. Breuning is 77 basis points below the 10.47 percent ROE implied by his own DCF analysis, highlighting a clear disconnect between the benchmark he relies upon and his market-implied analytical results.

Second, Mr. Farr and Mr. Breuning fail to consider forward-looking capital market expectations that investors incorporate when evaluating prospective investments. This omission is particularly problematic given that the ROE established in this proceeding is intended to recover the Company's cost of capital throughout the future rate term. As illustrated in Figure 1 below, market conditions can, and do, change meaningfully over time. For example, since the preparation of my Direct Testimony, increased market volatility and heightened geopolitical uncertainty have placed upward pressure on expected U.S. 30-year Treasury yields.

14 Direct Testimony of Drew Breuning, at 22.

FIGURE 1: AVERAGE AND PROJECTED U.S. 30-YEAR TREASURY YIELDS



It is therefore important to consider not only the historical relationship among relevant capital market indicators, such as the U.S. 30-Year Treasury, but also the trajectory of investor expectations of future returns.

III. UPDATED ROE ANALYSES

Q. PLEASE DESCRIBE THE DATA APPLIED IN YOUR UPDATED ROE ANALYSES.

A. In my Direct Testimony, filed in January 2026, I used market data updated through November 28, 2025. For this Rebuttal Testimony, I have updated the results of the financial models used to estimate the cost of equity for NFGDC in my Direct Testimony to include market data through March 31, 2026. I rely on the same proxy group of gas utilities. The results of my updated analyses are shown in Figure 2 below and Exhibits JCN-1R through JCN-5R. I included all of the companies in my original proxy group, demonstrating results both including and excluding Spire, Inc. The

average three-model ROE result increased by seven basis points since I filed my Direct Testimony in January.

FIGURE 2: SUMMARY OF RESULTS, ALL PROXY COMPANIES

	Median	Mean
DCF Result	10.65%	11.37%
CAPM Result	11.47%	11.58%
Risk Premium	10.44%	10.44%
Average	**10.89%**	**11.13%**

IV. RESPONSE TO INTERVENOR WITNESSES' CAPITAL STRUCTURE RECOMMENDATIONS

Q. PLEASE SUMMARIZE THE CAPITAL STRUCTURE RECOMMENDATIONS PROPOSED BY MR. BREUNING AND MS. RENO.

A. Mr. Breuning categorizes the Company's requested equity ratio of 56.40 percent as "unreasonable."[15] For this reason, Mr. Breuning recommends that the Commission impute a hypothetical capital structure of 55.00 percent common equity and 45.00 percent debt[16] by reference to an "optimal" capital structure consisting of 50.00 percent common equity and 50.00 percent debt.[17] Ms. Reno's recommendation of a hypothetical capital structure comprised of 50.00 percent common equity and 50.00

15 Direct Testimony of Drew Breuning, at 15.

16 Direct Testimony of Drew Breuning, at 15.

17 Direct Testimony of Drew Breuning, at 16.

percent debt[18] rests on an inappropriate comparison to capital structures of the proxy group holding companies.[19] Moreover, while she references average authorized equity ratios, which are by definition at the operating company-level and contrary to her assessment of the holding company capital structures, she offers no substantiated rationale for concluding that NFGDC's equity ratio should be below the average authorized equity ratios in her comparison years from 2023 through 2025. As explained in further detail below, the capital structure recommendations by Mr. Breuning and Ms. Reno are inappropriate and based on flawed analyses.

Q. WHAT ARE THE REGULATORY GUIDELINES FOR DETERMINING THE REASONABLENESS OF A UTILITY'S CAPITAL STRUCTURE FOR RATEMAKING PURPOSES?

A. In a 2020 publication titled *A Cost of Capital and Capital Markets Primer for Utility Regulators,* the National Association of Regulatory Utility Commissioners ("NARUC") states that actual capital structure ratios should be used unless they "greatly diverge" from sound industry practice:

> A utility management must be permitted latitude, discretion, and flexibility in managing capital structure ratios. Since there is no practical methodology to pinpoint theoretically optimal capital structure ratios, targeted ratios can only be broadly conceptualized. Appropriate ratios may shift over time as capital market conditions or business risk characteristics change. Additionally, the timing of upcoming issuances and maturities may influence the capital structure ratios because both the size and frequency of issuances are affected by the relative cost-effectiveness of various issuance increments.
>
> Given these practical considerations, capital structure ratios cannot be deemed to be inappropriate unless the ratios greatly diverge from sound

18 Direct Testimony of Maureen L. Reno, at 6,7.

19 Direct Testimony of Maureen L. Reno, at 24, and OCA Ex. MLR-1, Schedule MLR-4.

> industry practice and cause a lack of financial flexibility that may lead to higher overall costs.
>
> ***
>
> As increasing financial leverage shifts the weight from common equity to lower cost debt, it also increases both the cost of debt and the cost of common equity. In practice, these offsetting impacts cancel each other out over a wide range of capital structure ratios.[20]

Further, James C. Bonbright explains in his seminal text Principles of Public Utility Rates that a hypothetical capital structure should be used only when actual capital structures are "clearly unsound" or "extravagantly conservative," reasoning that using hypothetical capital structures "substitutes an estimate of what the capital cost would be under non-existing conditions for what it actually is or will soon be under prevailing conditions."[21]

Q. MR. BREUNING ASSESSES THE COMPANY'S PROPOSED CAPITAL STRUCTURE AS "UNREASONABLE" FOR RATEMAKING PURPOSES.[22] DO YOU AGREE?

A. No, I do not. Mr. Breuning's conclusion is based on a comparison of the proxy group average equity ratios for the last 5-year period. In his discussion, Mr. Breuning calculates the five-year average capital structure of his proxy group, ranging from 36.62 percent to 60.47 percent equity, and notes that the Company's requested equity ratio "falls close to the highest end of the range."[23] While the term "close" is inherently

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20 NARUC, *A Cost of Capital and Capital Markets Primer for Utility Regulators* (April 2020), at 11 .

21 James C. Bonbright, Principles of Public Utility Rates, at 243-44 (1960). Republished with permission by the Regulatory Assistance Project.

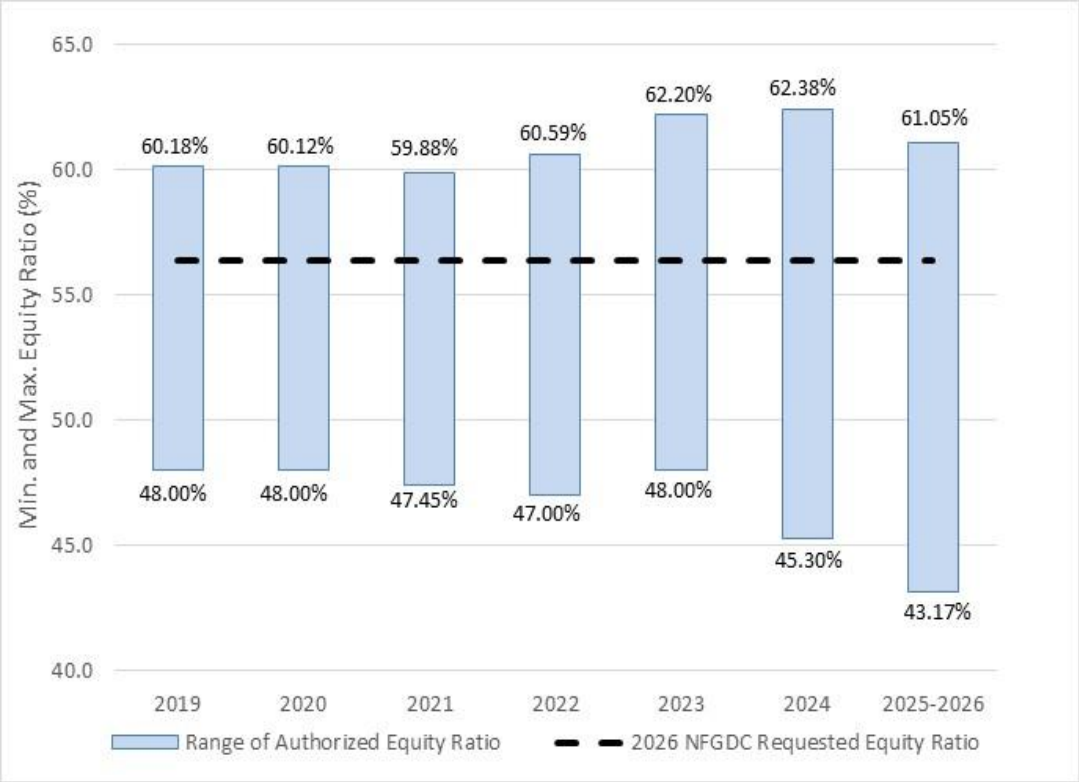
22 Direct Testimony of Drew Breuning, at 15.

23 Direct Testimony of Drew Breuning, at 15.

subjective, it is noteworthy that the Company's requested equity ratio of 56.40 percent is approximately *400* basis points below what Mr. Breuning characterizes as the upper end of his range. Moreover, as discussed above, Mr. Breuning's own analysis does not support his conclusion that the Company's proposed capital structure is "unreasonable." To the contrary, the requested 56.40 percent equity ratio falls squarely within the range he presents.

Further, as shown in Figure 3 below, the Company's requested equity ratio of 56.40 percent falls well within the range of authorized equity ratios for natural gas distribution companies over the past seven years.

FIGURE 3: RANGE OF AUTHORIZED EQUITY RATIOS FOR NATURAL GAS DISTRIBUTION COMPANIES (2019 - 2026) [24]



Although Mr. Breuning's recommendation of a 55.00 percent equity ratio is grounded in an assessment that I do not find persuasive or agree with, the equity ratio he ultimately proposes is not, in itself, unreasonable. However, it does not represent NFGDC's actual capital structure.

Q. HAS THE COMMISSION PREVIOUSLY INDICATED ITS PREFERENCE TO USE A UTILITY'S ACTUAL CAPITAL STRUCTURE?

A. Yes, it has. In a decision for PECO Energy Company ("PECO"), the Commission adopted PECO's actual capital structure despite Intervenor testimonies proposing the

24 Source: RRA. Excludes equity ratios authorized in states that permit non-investor supplied capital in the capital structures (*i.e.,* Indiana, Florida, Arkansas, and Michigan).

use of hypothetical capital structures. In its decision, the Commission noted that "we reaffirmed in *Columbia Gas* that the legal standard in Pennsylvania for deciding whether to use a party's proposed hypothetical capital structure in setting rates, *i.e.,* if a utility's actual capital structure is within the range of a similarly situated proxy group of companies, rates are set based on the utility's actual capital structure."[25] In the PECO decision, the Commission further reaffirmed the standard established in a 2012 Order for PPL Electric Utilities Corporation ("PPL"):

> Absent a finding by the Commission that a utility's actual capital structure is atypical or too heavily weighted on either the debt or equity side, we would not normally exercise our discretion with regard to implementing a hypothetical capital structure.[26]

Q. DO YOU AGREE WITH MR. BREUNING'S AND MS. RENO'S APPROACHES TO EVALUATING THE COMPANY'S CAPITAL STRUCTURE BASED ON PROXY GROUP HOLDING COMPANIES?[27]

A. No, I do not. Mr. Breuning's and Ms. Reno's analyses based on the *Value Line* projected capital structures do not provide an apples-to-apples assessment. Because capital at the parent holding company level may finance multiple, diverse utilities, or even unregulated operations, comparisons to the parent company capital structure lead to flawed and misleading conclusions. The Commission has previously addressed the

25 *PECO Energy Company- Gas Division,* Docket No. R-2020-3018929 *et al.*, Opinion and Order, at 144. [Citations Omitted.]

26 *PECO Energy Company- Gas Division,* Docket No. R-2020-3018929 *et al.*, Opinion and Order, at 144-145, citing *Pa. PUC. v. PPL Electric Utilities Corporation*, Docket No. R-2012-2290597 et al at 68.

27 Direct Testimony of Drew Breuning, at 18; Direct Testimony of Maureen L. Reno, at 24, and OCA Ex. MLR-1, Schedule MLR-4.

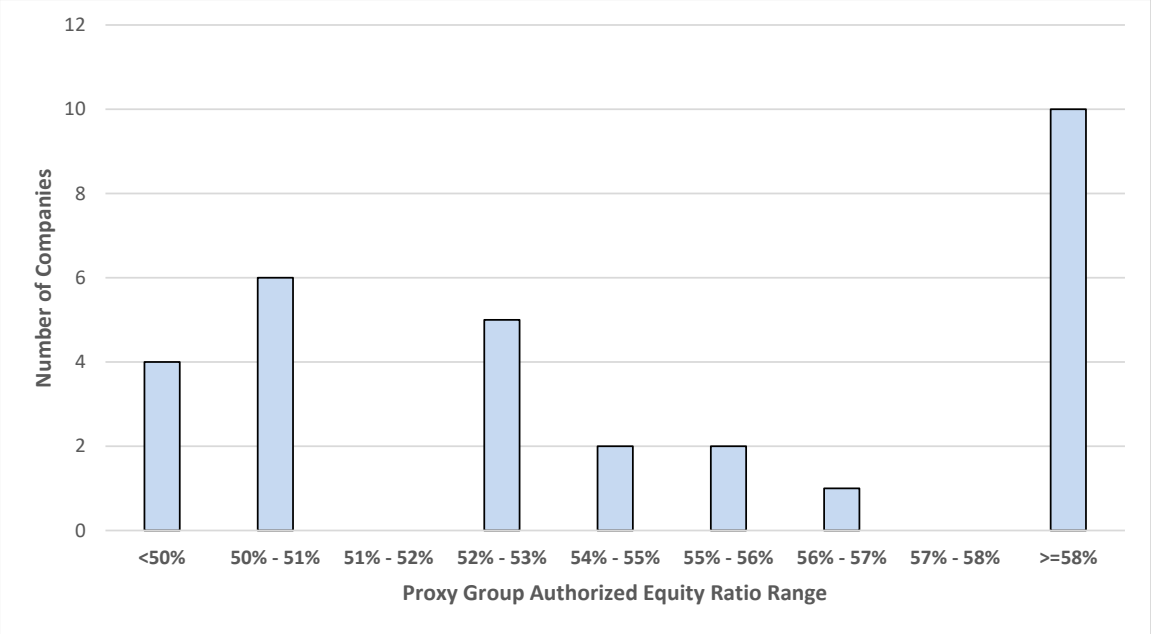
relevance of holding company capital structures when evaluating operating company capital structures:

> We note that because Exelon is a holding company, its capital structure reflects the financial risk associated with the ownership of multiple utilities, a large generation company, and significant unregulated competitive businesses. For this reason, we find that it is not appropriate to compare an operating utility's capital structure to the capital structure of its parent holding company that holds these diverse utility and non-utility operations.[28]

Since capital structure information is available for the regulated operating utilities of the proxy companies and supports the operations at the operating company level, it is more appropriate to consider the capital structures of the utility regulated operating companies as the benchmark for the Company's proposal. My analysis calculating the weighted average capital structures for each of the proxy group operating companies for the period 2022 to 2024 demonstrates that the Company's proposed common equity ratio of 56.40 percent is well within the range of actual common equity ratios of 46.51 percent to 60.16 percent (*see,* Exhibit JCN-10). To supplement this analysis, I assessed the distribution of authorized equity ratios for operating companies in my proxy group.

28 *PECO Energy Company- Gas Division,* Docket No. R-2020-3018929, Opinion and Order, at 147. [Citations Omitted.]

FIGURE 4: PROXY GROUP EQUITY RATIOS



As illustrated in Figure 4 above, a substantial number of operating companies in the proxy group have been authorized common equity ratios in excess of 56.00 percent.

Q. WHAT IS YOUR RESPONSE TO MS. RENO'S CONCERN REGARDING DOUBLE LEVERAGE?[29]

A. Ms. Reno asserts that the Commission should be "aware that the Parent, NFG, would benefit from double leveraging, in which a parent company issues debt and then infuses that debt into the regulated subsidiary as common equity."[30] Ms. Reno's concern regarding double leverage is unfounded and runs counter to the stand-alone regulatory principle, which treats each utility subsidiary as its own company. The cost of equity

29 Direct Testimony of Maureen L. Reno, at 25.

30 Direct Testimony of Maureen L. Reno, at 24-25.

of the subject utility, such as NFGDC, is estimated based on a determination of the subject company's standalone risk profile by reference to a proxy group of firms of comparable risk. According to financial principles, the cost of capital is based on the *use of funds*, not on the *source of funds*. Further, it is not feasible to directly trace one source of financing (*e.g.*, parent company borrowed funds) to a specific use of funds (*e.g.*, subsidiary equity). Professor James Bonbright, a widely recognized regulatory theorist and economist, discusses the impracticability of streaming the sources of funds to their eventual uses:

> Rate base is defined as the: (1) net plant in service; (2) property held for future use; (3) working capital; and (4) construction work in progress (CWIP) – no AFUDC. The capital structure simply represents the funds used to finance the rate base. The sources, not the uses, of funds (debt, equity, deferred taxes, and other capital structure components) are not easily traceable.[31]

Ms. Reno proposes an imputed capital structure consisting of 50.00 percent equity and 50.00 percent debt based, in part, on concerns regarding double leverage. However, setting aside the inapplicability of double leverage to the determination of NFGDC's capital structure, Ms. Reno's proposal is unsupported, as it adopts an equity ratio below NFGDC's parent company's (National Fuel Gas Company's ("NFG")) 53.90 percent equity ratio in the Historic Test Year without any compelling justification. Moreover, Ms. Reno erroneously compares NFGDC's FPFTY equity ratio of 56.40 percent to the NFG's Historic Test Year equity ratios. Using comparable forecasted equity ratios to ensure an apples-to-apples assessment, NFGDC's proposed 56.40 percent equity ratio is 610 basis points *below* NFG's projected 62.50 percent

31 Bonbright, Danielsen, & Kamerschen, Principles of Public Utility Rates, Second Edition, Public Utilities Reports, Inc., at 237.

equity ratio.[32] The fact that NFG's projected equity ratio is higher than its subsidiaries further dispels Ms. Reno's concerns of double leverage.

V. CONSIDERATION OF MANAGEMENT EFFICIENCY ROE ADDER

Q. PLEASE SUMMARIZE THE INTERVENOR WITNESSES' POSITIONS REGARDING THE PROPOSED MANAGEMENT EFFICIENCY ROE ADDER.

A. The Intervenor Witnesses argue against the Company's proposed management efficiency adders. Ms. Reno states that the "proposed adder is unsupported by the record, duplicative of elements already embedded in the ROE, and is inconsistent with established ratemaking principles."[33] Although, as Ms. Reno acknowledges, "there is no adjustment in Mr. Nowak's analysis that isolates customer satisfaction metrics, safety performance, reliability statistics, or other operational indicators for proxy group companies."[34] Mr. Breuning argues that "true strong management performance is earning a higher return through efficient use of resources and cost cutting measures," and that no utility should be "gifted" additional return for "doing what they are required to do."[35] Ms. Wise asserts that NFGDC has not provided documented evidence of the superior management performance and customer service to warrant the management

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32 National Fuel Gas Distribution Corporation, Responses to Section 53.53 – III-E-Rate of Return, III.E.1.

33 Direct Testimony of Maureen L. Reno, at 60.

34 Interrogatories of National Fuel Gas Distribution Corporation, OCA Response to NFG Set II, NFGD to OCA II-1.

35 Direct Testimony of Drew Breuning, at 53.

efficiency adder.[36] Finally, Mr. Farr contends that the proposed management efficiency adder has not been adequately benchmarked or quantified.[37] Notably, Mr. Farr asserts that while NFGDC's relatively low customer bills, operational efficiencies, and customer service performance are positive outcomes, they do not demonstrate that the Company faces greater financial risk that would warrant a higher ROE.[38]

Q. WHAT IS YOUR RESPONSE TO THE INTERVENORS' POSITIONS REGARDING THE COMPANY'S PROPOSED MANAGEMENT EFFICIENCY ROE ADDER?

A. I disagree with the Intervenor Witnesses' categorization of the Company's request and support the Company's request based on its demonstration of performance in the key areas discussed in Company Witness Rebecca E. Hillery's Direct Testimony. As acknowledged by Mr. Farr, the Company has demonstrated positive outcomes amid a challenging operating environment. While the Company continues to support the applicability of a management efficiency adder, NFGDC recognizes the importance of customer affordability amid ongoing inflationary pressures and has therefore chosen to forgo the request for an adder in the instant proceeding.

36 Direct Testimony of LeeAnn Wise, at 5.

37 Direct Testimony of Justin B. Farr, at 10-11.

38 Direct Testimony of Justin B. Farr, at 11.

VI. ECONOMIC AND CAPITAL MARKET CONDITIONS

Q. HOW HAVE THE ECONOMIC AND FINANCIAL MARKET CONDITIONS CHANGED SINCE YOU PREPARED YOUR DIRECT TESTIMONY?

A. Since I filed my Direct Testimony in January 2026, the U.S. economy has remained in a tenuous phase of the business cycle, shaped by heightened geopolitical tensions and persistently elevated inflation and interest rates. Although the Federal Reserve has been navigating a shifting economic backdrop with respect to inflation and unemployment rates, rapidly evolving external events create additional volatility and uncertainty as to future monetary policy. In late February, a major combined U.S.-Israel military operation, "Operation Epic Fury," targeted Iranian military and nuclear infrastructure in the Middle East. These events, along with increased trade tensions with China over Taiwan in late 2025 and uncertain domestic financial policy have increased economic volatility and uncertainty, particularly for energy companies. The war in the Middle East has created the largest supply disruption in the history of the global oil market[39] along with a significant impact on global product markets. While the International Energy Agency ("IEA") member countries agreed to release emergency reserves to the market to mitigate the negative impact on economies from the supply disruptions, the ongoing conflict in the Middle East will continue to strain global supply. Vanguard, one of the largest American asset managers, notes that "the scale and persistence of energy disruptions raise noteworthy risks for growth, inflation, and central bank

39 IEA, Oil Market Report – March 2026. Accessible at https://www.iea.org/reports/oil-market-report-march-2026

decision-making" in which "sustained energy price shocks could push inflation higher, tighten financial conditions, and complicate policy trade-offs."[40]

Furthermore, OCA Witness Reno agrees that investor concern over this persistent inflation is growing, and notably, the full magnitude of these disruptions has yet to be captured in current indicators.[41] Reno cites a report from *Value Line Investment Survey,* stating that investors are increasingly concerned about persistent inflation particularly since the latest indicators have not fully reflected the international oil supply shocks caused by U.S. military operations in Iran.[42]

Following the Federal rate cuts in 2025, the Federal Reserve maintained the target range of 3.50 to 3.75 percent in its March 2026 meeting, but noted that "uncertainty about the economic outlook remains elevated" and "the implications of developments in the Middle East for the U.S. economy are uncertain."[43] Investors expect the continued conflict in the Middle East and high oil prices to challenge the Federal Reserve's future actions. While the Federal Reserve's dual mandate (*i.e.*, inflation and unemployment) falls under pressure, "we would expect the Fed to have a bias toward inaction, although already elevated inflation will keep policymakers vigilant to potential changes in inflation expectations."[44] S&P Global also notes that financing costs could become overly burdensome:

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40 Vanguard, "The potential impact of high oil prices on economies," March 10, 2026.

41 Direct Testimony of Maureen L. Reno., at 12-13

42 *Id.*

43 Federal Reserve issues FOMC statement, March 18, 2026. Accessible at https://www.federalreserve.gov/newsevents/pressreleases/monetary20260318a.htm

44 Vanguard, "The potential impact of high oil prices on economies," March 10, 2026.

> The looming higher inflation has the Treasury bond's break-even inflation rate drifting up. Persistent or higher inflation—along with increased downside risk to growth—could complicate the Federal Reserve's policy making. Coupled with investor sentiment that is increasingly prone to sudden shifts, the cost of debt service and/or refinancing could stay elevated or increase at a time when demand for capital to fund AI-related initiatives could crowd out other borrowers.[45]

The declining sentiment has extended to consumers as Joanna Hsu notes in her final results for April 2026:

> Consumer sentiment ticked down 3.5 index points this month, now comparable to the trough seen in June 2022. Decreases in sentiment were seen across political party, income, age, and education. Expected business conditions declined for both short and long time horizons, nearly matching year-ago readings when the reciprocal tariff regime was implemented. After the two-week cease-fire was announced and gas prices softened a touch, sentiment recovered a modest portion of its early-month losses. The Iran conflict appears to influence consumer views primarily through shocks to gasoline and potentially other prices. In contrast, military and diplomatic developments that do not lift supply constraints or lower energy prices are unlikely to buoy consumers.[46]

These events and increased tensions have heightened market expectations of near-term volatility, as measured by the CBOE Volatility Index ("VIX"). As seen below in Figure 5, the VIX increased from an index level of 16.35 on January 28, 2026, when my Direct Testimony was filed, to 25.25 as of March 31, 2026.

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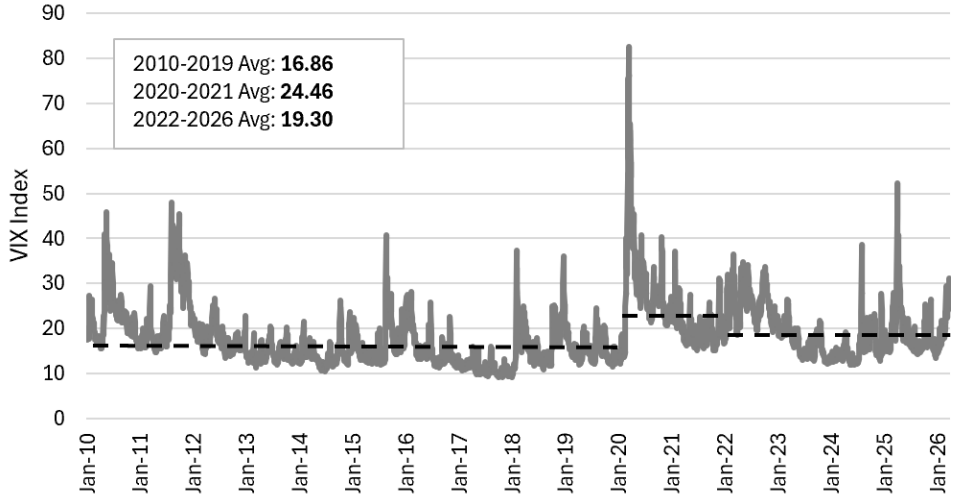
45 S&P Global, "Credit Conditions North America: U.S. Macro and Credit Effects of the Middle East Conflict," March 13, 2026.

46 University of Michigan, Survey of Consumers, Final Results for April 2026. https://www.sca.isr.umich.edu/

FIGURE 5: CBOE VIX – JANUARY 1, 2010 – MARCH 31, 2026[47]



Q. WITNESS RENO ASSERTS THAT "RECENT STOCK MARKET VOLATILITY HAS BEEN ACCOMPANIED BY INDEXES FALLING BY MID-SINGLE DIGITS".[48] HAVE UTILITY STOCK PRICES ALSO BEEN MORE VOLATILE IN RECENT MONTHS?

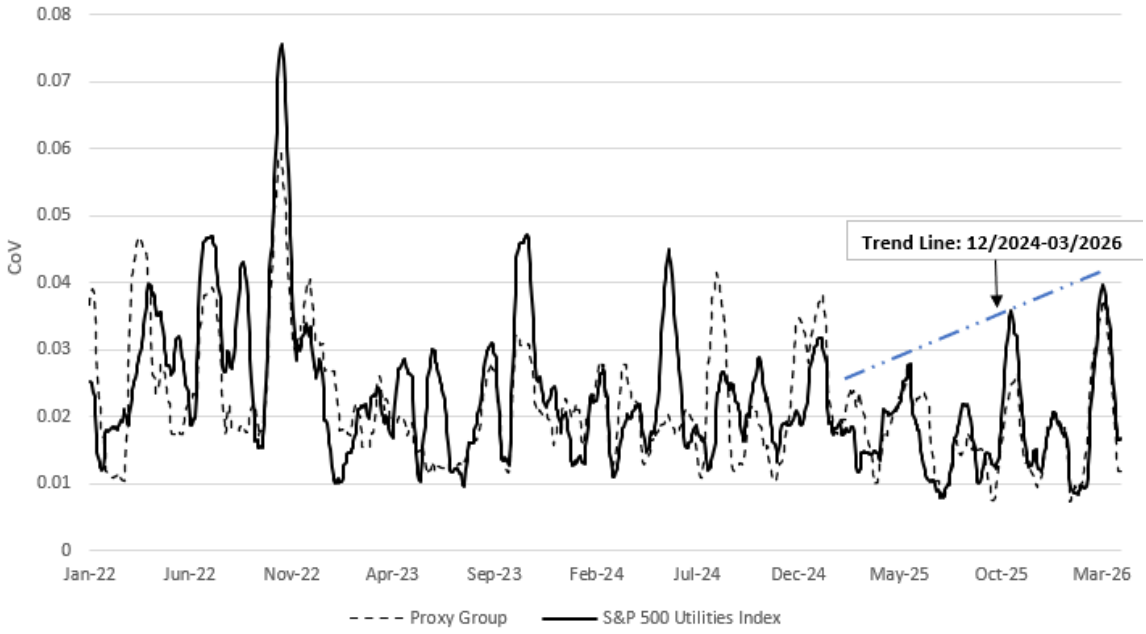
A. Yes, they have. The Coefficient of Variation is a measure of volatility defined as the ratio of the standard deviation to the mean over a given period. I calculated the Coefficient of Variation in the market price for the proxy group and the S&P 500 Utilities Index over a rolling 30-day period[49] to assess the trend in utilities' stock price volatility. As Figure 6 below shows, the Coefficient of Variation spiked sharply in late 2022 and, after a period of relative moderation, has resumed an upward trend beginning in late 2024 and continuing through early 2026, with recent levels approaching those last seen during the late 2022 spike.

47 Source: CBOE Exchange, Inc., https://www.cboe.com/tradable-products/vix/vix-historical-data/.

48 Direct Testimony of Maureen L. Reno, at 13.

49 A 30-day period is consistent with the VIX's measurement of expected volatility over the coming 30 days.

FIGURE 6: UTILITY STOCK PRICE VOLATILITY (2022-2026)[50]



Q. WHAT ARE THE EXPECTATIONS FOR LONG-TERM INTEREST RATES?

A. Despite the additional Federal rate cuts at the end of 2025, long-term interest rates have not changed much and are not expected to change significantly in the medium term. The change in the Federal Funds rate is primarily affecting only short-term interest rates, as can be seen in Figure 7 below. Figure 7 includes the yield as of September 30, 2025, November 28, 2025, and March 31, 2026 for 3-month, 6-month, 1-year, 2-year, 5-year, 10-year, and 30-year Treasury securities. The figure also includes projections from *Blue Chip Financial Forecasts* ("Blue Chip"), illustrating the expectation for near-term yields to decline over the next year and long-term yields to rise or remain near the current elevated levels.

50 Source: S&P Capital IQ

FIGURE 7: CURRENT AND PROJECTED INTEREST RATES

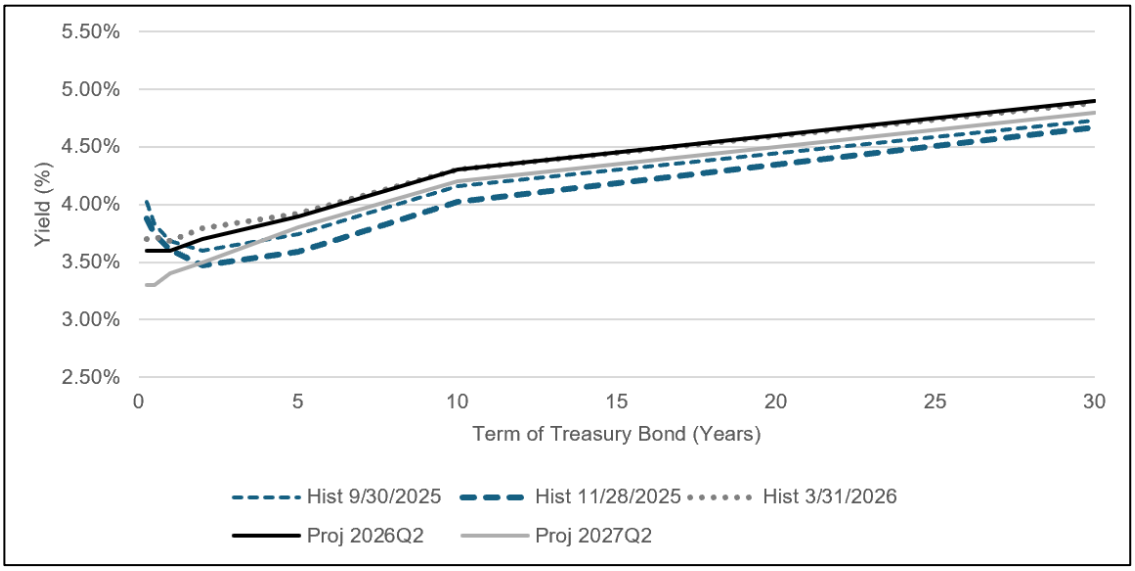


Figure 2 on page 16 of Ms. Reno's testimony further demonstrates how the Treasury security yield curve has reversed course since the Company's last rate case. While the yield of long-term treasury securities was expected to decline in the Company's last rate case, it is now expected to increase.

Mr. Breuning contends that projected Federal Reserve rate cuts "would likely positively impact long-term borrowing rates" during the FPFTY.[51] However, as Figure 7 demonstrates, this has not been the case. The 30-year Treasury yield that is applied in the ROE models and used as a benchmark for long-term debt – is less sensitive to the Federal Reserve's monetary policy. As shown in the figure above, and Figure 1 on page 14 of Ms. Reno's testimony, there has been a clear bifurcation in the path of short- and long-term yields. While the 3-month Treasury yields and Federal Funds rate have declined since 2024, the 30-Year Treasury and Moody's Aaa- and Baa-rated yields

51 Direct Testimony of Drew Breuning, at 44.

have continued to increase. Since long-term yields are most relevant in estimating the cost of equity, and the models used to estimate the just and reasonable ROE rely primarily on long-term yields, the market movement of short-term yields does not influence the ROE model results as the longer-term yields do. As such, even though the Federal Reserve has cut the Federal Funds Rate by 25 basis points in each of September, October, and December 2025 (75 basis points total),[52] this has had minimal impact on the long-term borrowing costs most relevant to the cost of equity for a regulated utility such as NFGDC.

Q. IS INFLATION EXPECTED TO REMAIN SOMEWHAT ELEVATED?

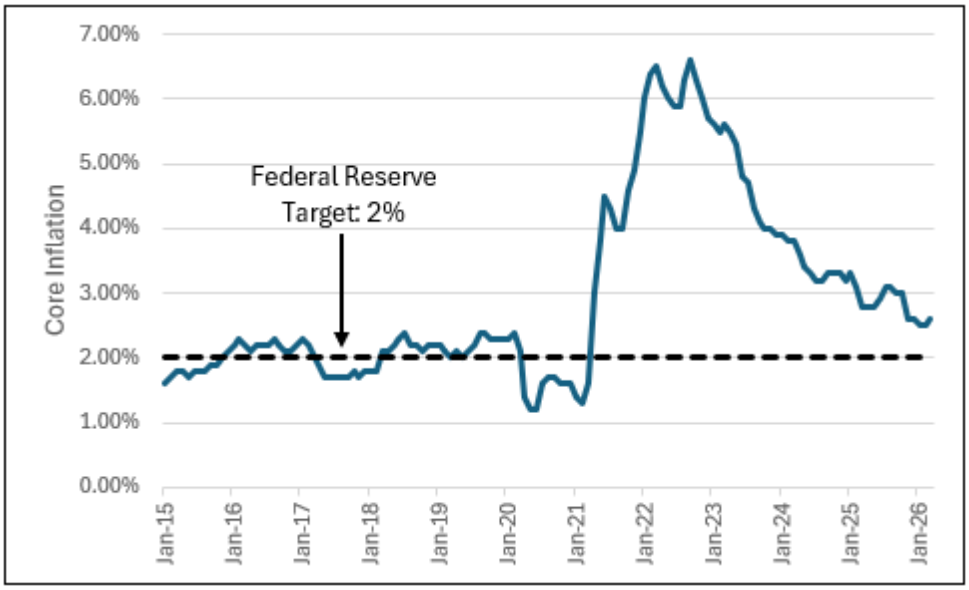
A. Even though the pace of inflation has slowed, U.S. consumers continue to expect inflation to remain elevated. The University of Michigan Surveys of Consumers final results for March 2026 indicates that year-ahead inflation expectations rose to 3.8 percent from 3.4 percent in February, marking the largest one-month increase since April 2025 and the highest reading since 2024, while long-run inflation expectations "inched" down to 3.2 percent.[53] Furthermore, the final results for April 2026 indicates that year-ahead inflation expectations increased further to 4.7 percent, the largest one-month rise since April 2025 and above levels observed throughout 2024, while long-run inflation expectations rose to 3.5 percent, the highest reading since October

52 Federal Reserve issues FOMC statement, December 10, 2025. Accessible at https://www.federalreserve.gov/newsevents/pressreleases/monetary20251210a.htm

53 University of Michigan, Survey of Consumers, Final Results for March 2026.

2025.[54] (*See, also,* Figure 8 below.) Furthermore, the Federal Reserve notes that "the implications of developments in the Middle East for the U.S. economy are uncertain."[55]

FIGURE 8: YEAR-OVER-YEAR CORE INFLATION (2015-2026)[56]



Concerns of inflation and higher costs arising from the increased geopolitical tensions in Iran were further confirmed by the March 2026 CPI data. The Consumer Price Index rose 0.9 percent in March, after rising just 0.3 percent in February, pushing the annual inflation rate to 3.3 percent, with energy prices surging 10.9 percent, led by a 21.2 percent increase in gasoline prices that accounted for nearly three-quarters of the monthly increase.[57]

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54 University of Michigan, Survey of Consumers, Final Results for April 2026. https://www.sca.isr.umich.edu/

55 Federal Reserve, Press Release, March 18, 2026. https://www.federalreserve.gov/newsevents/pressreleases/monetary20260318a.htm.

56 Source: U.S. Bureau of Labor Statistics.

57 U.S. Bureau of Labor Statistics, Consumer Price Index Summary, March 2026 (released April 10, 2026). https://www.bls.gov/news.release/cpi.nr0.htm

As stated above, OCA Witness Reno independently corroborates this concern. Notably, Mr. Breuning does not dispute the existence of these geopolitical risks. He acknowledges that NFGDC "faces the same exposure to these issues as all the other companies in our respective proxy groups."[58] If all proxy group companies face the same elevated geopolitical and inflationary risks, then the proxy group's market data already reflects those risks, supporting, rather than diminishing, the case for an authorized ROE that reflects current elevated market conditions.

Q. WHAT ARE YOUR CONCLUSIONS REGARDING THE CHANGES IN CAPITAL MARKET CONDITIONS SINCE YOUR PREVIOUS ASSESSMENT?

A. The economic and geopolitical tensions present at the time I filed my Direct Testimony in January 2026 have continued to intensify and are expected to become an increasingly important factor in the Federal Reserve's monetary policy decisions. While there continue to be significant unknowns regarding how long the conflict in the Middle East may last and to what extent the U.S. economy will be impacted, investors will continue to be influenced by the rising uncertainty and consequent elevated risk.

58 Direct Testimony of Drew Breuning., at 45.

VII. RESPONSE TO I&E WITNESS BREUNING'S RECOMMENDATION ON THE COST OF CAPITAL

Q. PLEASE SUMMARIZE MR. BREUNING'S ROE AND CAPITAL STRUCTURE ANALYSIS AND RECOMMENDATION.

A. Mr. Breuning recommends an authorized ROE of 9.81 percent for NFGDC, based on the average results of his DCF and CAPM models and the average authorized ROEs for gas distribution utilities nationwide from January 2025 through March 11, 2026. Mr. Breuning's DCF estimate is 10.47 percent; he presents two CAPM analyses with an average estimate of 9.25 percent; and he reports the average authorized ROE for gas distributors as 9.70 percent. In addition, Mr. Breuning recommends an imputed capital structure for NFGDC which includes a common equity ratio of 55.00 percent.

Q. ARE THERE ANY AREAS IN WHICH YOU AND MR. BREUNING AGREE?

A. Yes. Mr. Breuning and I both consider Constant Growth DCF and CAPM analyses to estimate the ROE for NFGDC, and we agree on certain inputs to those models such as analysts' forecast earnings per share ("EPS") growth rates in the DCF model and *Value Line* Beta coefficients in the CAPM. I also present the results of a Bond Yield Plus Risk Premium analysis, while Mr. Breuning observes that the Commission has not historically relied on the Risk Premium model, although he does use the average authorized returns for gas distributors in other jurisdictions as his third "model" to estimate the return for NFGDC.

Q. WHAT ARE THE PRINCIPAL AREAS OF DISAGREEMENT BETWEEN YOU AND MR. BREUNING?

A. There are several areas where Mr. Breuning and I disagree, including: (1) the composition of a risk comparable proxy group for NFGDC; (2) the application of the DCF model; (3) certain inputs and assumptions used in the CAPM analysis; (4) the usefulness and relevance of the Risk Premium model; and (5) the relative business risk of NFGDC compared to the proxy group companies. I address each of these points below.

A. Proxy Group Composition

Q. PLEASE EXPLAIN WHY YOU DISAGREE WITH THE PROXY GROUP SELECTED BY MR. BREUNING.

A. Mr. Breuning develops a proxy group of six gas distribution utilities based on his six screening criteria which consist of: (1) 50 percent or more of the company's revenue must be generated from the regulated gas utility industry; (2) the company's stock must be publicly traded; (3) investment information for the company must be available from more than one source, which includes *Value Line*; (4) the company must not be currently involved in a merger or the target of an acquisition; (5) the company must have four consecutive years of historic earnings data; and (6) the company must be operating in a state that has a deregulated natural gas utility market.[59] While Mr. Breuning and I selected many of the same gas distribution companies for inclusion in the NFGDC proxy group, I continue to believe that Southwest Gas Holdings, Inc.

59 Direct Testimony of Drew Breuning, at 9.

("Southwest Gas") and Spire, Inc. ("Spire") should be included in the proxy group for NFGDC, and I disagree with Mr. Breuning's inclusion of Chesapeake Utilities Corporation.

Q. WHY DID MR. BREUNING EXCLUDE SOUTHWEST GAS AND SPIRE FROM THE PROXY GROUP FOR NFGDC?

A. Mr. Breuning explains that he excluded Southwest Gas because the company derives less than 50 percent of its revenues from gas distribution, and he excluded Spire because it is engaged in the purchase of the Tennessee assets of Piedmont Natural Gas from Duke Energy Corporation.[60]

Q. PLEASE EXPLAIN WHY YOU DISAGREE WITH THE EXCLUSION OF SOUTHWEST GAS.

A. Mr. Breuning excluded Southwest Gas from his proxy group because he screened companies based on the percentage of revenues derived from gas distribution operations rather than the percentage of net operating income. However, net operating income better reflects the contribution of each business segment to a given company's earnings, which is the factor that equity investors are most focused on as they establish their return requirements and make investment decisions. Since regulated gas utilities collect the cost of purchased gas through rates on a pass-through basis without margin, regulated revenue can fluctuate materially from year-to-year with changes in weather and the cost of purchased gas, without affecting the corporation's earnings or financial position. In contrast, net operating income, which excludes pass-through commodity

60 Direct Testimony of Drew Breuning, at 12-13.

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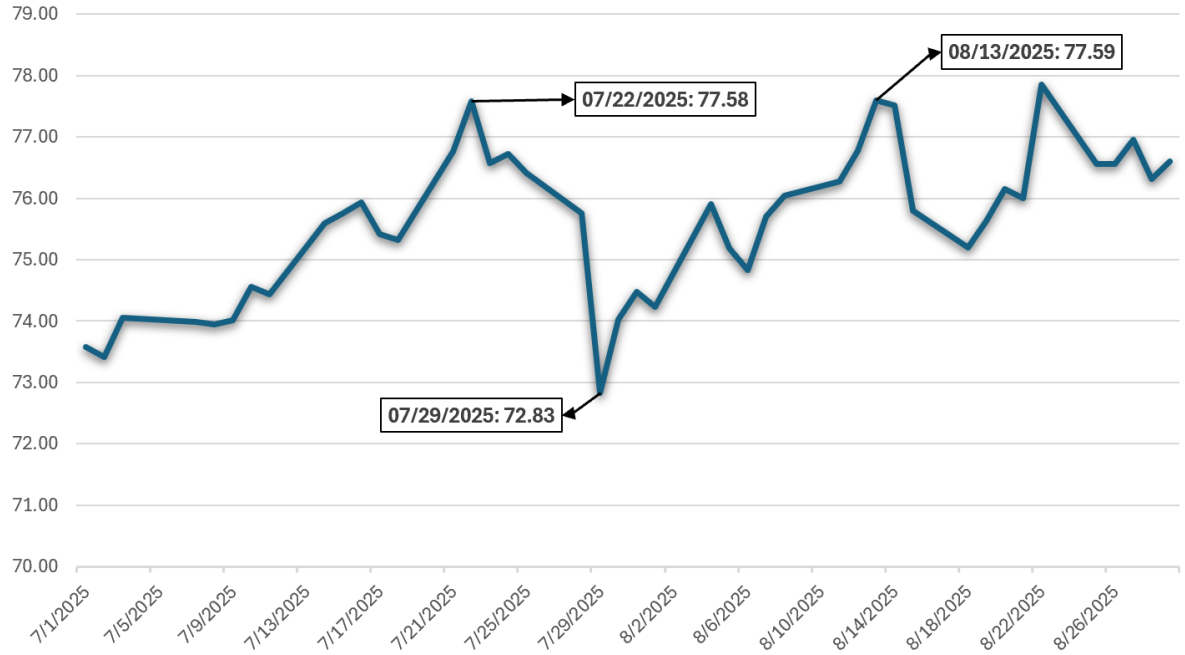
costs, more closely represents the effect of each business segment on the corporation's overall earnings, and therefore its risk profile. For that reason, the percentage of net operating income from regulated gas distribution operations is more representative of the risks faced by NFGDC and its investors than is the percentage of regulated revenue that Mr. Breuning uses to screen his proxy group. Southwest Gas derived slightly more than 80 percent of its operating income from gas distribution service in 2024, and approximately 80 percent of the company's assets were dedicated to gas distribution service in 2024. On that basis, it is appropriate to include Southwest Gas in the proxy group for NFGDC.

Q. PLEASE EXPLAIN WHY YOU DISAGREE WITH THE EXCLUSION OF SPIRE FROM THE PROXY GROUP.

A. Although I recognize that Spire is involved in a significant transaction to acquire the Tennessee assets of Piedmont Natural Gas from Duke, I do not agree with Mr. Breuning that the transaction had a material effect on Spire's stock price.[61] As discussed in my Direct Testimony, Spire's share price changed by a similar percentage to the other proxy group companies from the time the acquisition was announced to the time when the analysis in my Direct Testimony was performed. In addition, the share price of Spire was not affected by the acquisition announcement. As shown in Figure 9 below, Spire traded at $77.58 per share on July 22, 2025, one week before the acquisition was announced, then dropped to $72.83 per share on July 29, 2025, before increasing back to $77.59 per share on August 13, 2025.

61 Direct Testimony of Drew Breuning, at 13-14.

FIGURE 9: SPIRE STOCK PRICE – PRE AND POST ACQUISITION[62]



Mr. Breuning contends that Spire's stock price increased by more than the proxy group average during the analytical period. However, a higher share price would cause a decrease in the dividend yield for Spire, meaning that Spire's DCF model results would be lower, not higher, than they would have been absent the transaction, making the results conservative if affected by the transaction. I note that Ms. Reno agrees with the inclusion of Spire in the proxy group.[63]

62 Source: S&P Capital IQ

63 Direct Testimony of Maureen L. Reno, at 28.

Q. WHY DO YOU DISAGREE WITH MR. BREUNING'S DECISION TO INCLUDE CHESAPEAKE UTILITIES IN THE PROXY GROUP FOR NFGDC?

A. I excluded Chesapeake from the proxy group because it did not pass two of my stated screening criteria: 1) it does not have a credit rating from S&P Global Ratings or Moody's Ratings, and 2) it derives only slightly more than 50 percent of its regulated operating income from gas distribution operations. Mr. Breuning does not screen for an investment grade credit rating, so he did not exclude Chesapeake on that basis, and his revenue screen is set at 50 percent, which causes him to include Chesapeake in his group. However, I note that Chesapeake derives a significant portion of its revenues and net operating income from electric utility operations, natural gas transmission, and unregulated energy products and services. For these reasons, I do not view Chesapeake as a good proxy for NFGDC's gas distribution business in Pennsylvania.

Q. WHAT IS YOUR CONCLUSION REGARDING THE COMPOSITION OF THE PROXY GROUP FOR NFGDC?

A. My conclusion is that my proxy group, which includes Southwest Gas and Spire and excludes Chesapeake, is more risk comparable to NFGDC than Mr. Breuning's proxy group. Differences in the composition of Mr. Breuning's proxy group and mine have a significant effect on the differences in our respective ROE results and recommendations. I will discuss those effects on the model results in the following sections on the DCF and CAPM.

B. Application of the DCF Model

Q. PLEASE SUMMARIZE MR. BREUNING'S DCF ANALYSIS.

A. Mr. Breuning performs a Constant Growth DCF analysis to estimate the ROE for NFGDC in this proceeding. Mr. Breuning relies on analysts' projected EPS growth rates. He performs two dividend yield calculations, one based on average stock prices over the last 52 weeks, and the other based on spot stock prices. Mr. Breuning's DCF model provides an ROE estimate of 10.47 percent.[64] In his December 2025 testimony in the PPL Electric rate case (Docket No. R-2025-3057164), Mr. Breuning relied primarily on the results of his DCF model, observing that "while the Commission has more recently based some of its ROE decisions on a combination of the DCF and CAPM methods, I still recommend primary reliance on the DCF method due to the shortcomings associated with the CAPM method."[65] In this proceeding Mr. Breuning, however, averages the results of his DCF model with the results of his CAPM analysis and the average authorized ROEs for gas distributors nationwide since January 2025 to arrive at his recommendation for NFGDC.

Q. DO YOU HAVE ANY COMMENTS ON MR. BREUNING'S DCF ANALYSIS?

A. While I agree with the analysts' *earnings* growth rate projections that Mr. Breuning uses in his DCF model, I do not agree with the way in which he calculates the dividend yield. However, despite my concern with Mr. Breuning's use of spot stock price and 52-week average stock prices, our resulting dividend yields are similar. In addition, it

64 Direct Testimony of Drew Breuning, at 7.

65 PPL Electric Utilities Corporation, Docket No. R-2025-3057164, Direct Testimony of Drew Breuning, at 23.

is not clear why Mr. Breuning did not base his ROE recommendation for NFGDC primarily on the results of his DCF model. This is a departure from his recent testimony in the case of PPL Electric (Docket No. R-2025-3057164), where Mr. Breuning recommended a 10.32 percent authorized ROE based on the results of his Constant Growth DCF model, while also presenting a CAPM analysis similar to the one he presents in this proceeding.

Q. PLEASE SUMMARIZE THE EFFECT OF PROXY GROUP COMPOSITION ON MR. BREUNING'S AND YOUR RESPECTIVE DCF MODEL RESULTS.

A. As shown in Exhibit JCN-2R, Southwest Gas (at 14.06 percent) and Spire (at 13.21 percent) have the highest DCF results of the seven gas distribution companies in my proxy group. By excluding those two companies, Mr. Breuning effectively reduces his DCF estimate for NFGDC even though both companies are relevant comparators for NFGDC in terms of business and financial risk. If Mr. Breuning had included Southwest Gas and Spire in his proxy group, his DCF results would increase by 79 basis points from 10.47 percent to 11.26 percent. By comparison, the mean results of my updated DCF model range from 11.20 percent to 11.51 percent, depending on the averaging period. Chesapeake Utilities has a DCF estimate of 10.34 percent. If Mr. Breuning had excluded Chesapeake from this proxy group, the mean results of his DCF analyses would increase by three basis points from 10.47 percent to 10.50 percent.

C. Application of the CAPM Model

Q. PLEASE SUMMARIZE MR. BREUNING'S CAPM-BASED ROE ESTIMATES.

A. Mr. Breuning's CAPM analysis uses a projected yield on the 10-year Treasury bond from *Blue Chip* for his estimate of the risk-free rate and *Value Line* Beta coefficients. To determine the equity risk premium ("ERP"),[66] Mr. Breuning first determines the overall market return by averaging a forward-looking *Value Line* median return estimate and the average return of the S&P 500 over the past 100 years. He also provides a second CAPM-based ROE estimate, relying on Kroll's recommended ERP and the 20-Year U.S. Treasury Bond yield. As shown in I&E Exhibit No, Schedule 18, Mr. Breuning estimates a 9.95 percent ROE using a forecasted market return and an 8.55 percent ROE using Kroll's recommended ERP. The average of these two CAPM estimates is 9.25 percent.

At the outset, and as discussed in detail in my response to Ms. Reno, I recommend that the Commission not give any weight to Mr. Breuning's CAPM estimate based on Kroll's recommended ERP, as it is below any authorized ROE for a gas distribution utility since at least 1980 and would not provide NFGDC a reasonable opportunity to earn a comparable return as required by the *Hope* and *Bluefield* standards.

Q. MR. BREUNING DISCUSSES SEVERAL "DISADVANTAGES" ASSOCIATED WITH THE USE OF THE CAPM METHOD IN

66 In the context of the CAPM, the ERP and MRP are synonymous.

DETERMINING THE ROE.[67] PLEASE COMMENT ON HIS CONCERNS WITH THE CAPM.

A. According to Mr. Breuning, the CAPM – and the Risk Premium method by association – possess several "disadvantages" that suggest these models "are less reliable indicators" than the DCF model, which according to Mr. Breuning is "the superior method for determining the rate of return for the current economic market and measuring the cost of equity directly."[68] More specifically, Mr. Breuning voices concerns with Beta coefficients, the company-specific component of the CAPM, as he believes its reliance on historical data is "problematic" given the nature of current economic conditions.

While I agree that Beta coefficients are derived from historical market data, other variables, such as a projected risk-free rate and a forward-looking estimate of the market return, help capture the expected impact of current and future economic conditions. In fact, Mr. Breuning himself uses a projected risk-free rate in his CAPM analysis.[69] Furthermore, my use of 10-year historical Beta coefficients in the CAPM offers a long-term perspective on market conditions, recognizing that the economic and regulatory landscape changes over time. Further, the use of adjusted Beta coefficients like those calculated by *Value Line* and Bloomberg can be interpreted as being forward looking because they correct for the tendency of Beta coefficients to move toward the market average of 1.0 over time. For these reasons, I disagree with Mr. Breuning's conceptual concerns with the CAPM.

67 Direct Testimony of Drew Breuning, at 26-27.

68 *Id*., at 26-27.

69 Direct Testimony of Drew Breuning, at 34-35.

Q. MR. BREUNING HAS PREVIOUSLY DISAGREED WITH THE COMMISSION'S RECENT USE OF THE CAPM METHOD.[70] IN THIS PROCEEDING, HIS ROE RECOMMENDATION IS BASED ON THE AVERAGE OF HIS DCF AND CAPM RESULTS, ALONG WITH THE AVERAGE AUTHORIZED ROES FOR GAS DISTRIBUTORS. PLEASE COMMENT.

A. In his testimony for PPL Electric, Mr. Breuning referred to several recent decisions from the Commission in which the CAPM results were averaged with the DCF results to establish an authorized ROE for a regulated water utility. For example, in the 2024 base rate case order for Columbia Water Company, the Commission ultimately relied on the average of the I&E Witness' CAPM and DCF results to determine the ROE for Columbia Water Company.[71] In a subsequent rate case for Pennsylvania-American Water Company, the Commission recognized continued capital market conditions (*i.e.*, elevated inflation) while determining to employ both the DCF and CAPM models in setting the ROE for Pennsylvania-American Water Company.[72] While I do not disagree with the use of multiple approaches to estimate the cost of equity for a regulated utility such as NFGDC, Mr. Breuning does not explain why he has changed his approach. In particular, he relied solely on the results of his Constant Growth DCF model as recently as January 2026 in his PPL Electric testimony, while Mr. Breuning now averages his CAPM results and the average authorized ROEs for gas distributors

70 *See*, *for example*, the Direct Testimony of Drew Breuning in Docket No. R-2025-3057164.

71 *Pa. PUC v. Columbia Water Company*, Docket No. R-2023-3040258, at 105 (January 18, 2024).

72 *Pa. PUC v. Pennsylvania-American Water Company,* Docket Nos. R-2023-30433189 & R-2023-3043190, p. 194 (Order Entered July 22, 2024).

nationwide with his DCF model results to arrive at his ROE recommendation for NFGDC.

1. Risk-Free Rate of Return

Q. MR. BREUNING USES THE PROJECTED YIELD ON 10-YEAR TREASURY BONDS TO ESTIMATE THE RISK-FREE RATE, AS HE BELIEVES IT BALANCES THE SHORT-TERM VOLATILITY OF T-BILLS AND THE "SUBSTANTIAL MATURITY RISK" ASSOCIATED WITH LONG-TERM TREASURY BONDS.[73] WHAT IS YOUR RESPONSE?

A. I respectfully disagree with Mr. Breuning's use of 10-year Treasury bonds as the risk-free rate for the CAPM and his concerns surrounding the use of 30-Year Treasury bonds. In determining the security most relevant to the application of the CAPM, it is important to select the term that best matches the life of the underlying investment. As Morningstar explains:

> The traditional thinking regarding the time horizon of the chosen Treasury security is that it should match the time horizon of whatever is being valued… Note that the horizon is a function of the investment, not the investor. If an investor plans to hold stock in a company for only five years, the yield on a five-year Treasury note would not be appropriate, since the company will continue to exist beyond those five years.[74]

Since utility assets are long-duration investments, it is appropriate to use yields on long-term Treasury bonds as the risk-free rate component of the CAPM. Therefore, the 30-year Treasury bond is the most appropriate security for that purpose.

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73 Direct Testimony of Drew Breuning, at 34.

74 Morningstar Inc., Ibbotson SBBI 2013 Valuation Yearbook, at 44.

Q. IN DISCUSSING HIS CHOICE OF THE RISK-FREE RATE, MR. BREUNING CLAIMS THAT "THE 30-YEAR TREASURY BOND EXHIBITS MORE STABILITY BUT IS NOT RISK-FREE."[75] WHAT IS YOUR RESPONSE?

A. I agree with Mr. Breuning that 30-year Treasury bond "exhibits more stability." As Dr. Roger Morin notes, "On grounds of stability and consistency, the yields on long-term Treasury bonds match more closely with expected common stock returns."[76] However, I do not agree with Mr. Breuning that 30-year Treasury bonds are "not risk-free" because his assertion incorrectly comingles two types of risk: default risk and interest rate risk. Because long-term Treasury bonds are backed by the U.S. government, they are essentially free of default risk. Furthermore, as Dr. Morin goes on to explain, "While long-term Treasury bonds are potentially subject to interest rate risk, and are not theoretically 'risk-free,' this is only true if the bonds are sold prior to maturity. A substantial fraction of bond market participants, usually institutional investors with long-term liabilities (pension funds, insurance companies), in fact, hold bonds until they mature, and therefore are not subject to interest rate risk."[77] Given that investments in any government security will have some theoretical level of interest rate risk, as rates can change over time, it is important to consider the practical level of risk for such investments. Thus, given that the 30-year Treasury bond is a stable security free of default risk, has minimal real interest rate risk, and aligns with the life of the underlying investment in utility assets, as described above, it serves as an appropriate security for the risk-free rate component of the CAPM.

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75 Direct Testimony of Drew Breuning, at 34.

76 Roger A. Morin, PhD., New Regulatory Finance, Public Utility Reports, Inc., at 152 (2006).

77 *Id.* [Citation omitted.]

2. Market Risk Premium

Q. PLEASE SUMMARIZE MR. BREUNING'S APPROACH TO DETERMINING THE MARKET RISK PREMIUM.

A. As previously mentioned, Mr. Breuning takes two approaches in determining the market risk premium. First, he averages a forward-looking and historical estimate of the market return, from which he subtracts his estimate of the risk-free rate of 4.20 percent to arrive at an estimated MRP. To conduct the forward-looking market return approach, Mr. Breuning relies on the February 27, 2026 edition of the *Value Line Investment Survey*, covering roughly 1,700 companies in the *Value Line* universe. From this report, he combines a 2.00 percent median forecasted dividend yield for all dividend-paying companies with a growth rate of 8.78 percent, derived from a median estimated three-to-five year stock price appreciation potential of 40 percent for all companies. Mr. Breuning averages this expected market return of 10.78 percent with the average annual return of the S&P 500 over the last 100 years, 12.35 percent, to arrive at his market return estimate of 11.57 percent.[78] Additionally, Mr. Breuning provides a second market risk premium estimate based on Kroll's recommended market risk premium of 5.00 percent,[79] which I oppose, as discussed in my response to Ms. Reno.

78 Direct Testimony of Drew Breuning, at 35.

79 Direct Testimony of Drew Breuning, at 36.

Q. DO YOU AGREE WITH HOW MR. BREUNING CALCULATES HIS FORWARD-LOOKING MARKET RISK RETURN USING *VALUE LINE* DATA?[80]

A. No, I do not. As a preliminary matter, Mr. Breuning is not correct when he notes that "Value Line expects its universe of approximately 1700 stocks to have an *average* yearly return of 10.78% over the next three to five years based on a forecasted dividend yield of 2.00% and a yearly index appreciation of 40%."[81] As *Value Line's* Summary & Index report clearly states, the 2.00 percent and 40 percent are "The *Median* of Estimated Dividend Yields (next 12 months) of all dividend paying stocks" and "The *Median* Estimated Three-To-Five Year Price Appreciation Potential of all stocks in the VL Universe," respectively.[82] When an investor invests in the overall market (which is being approximated here by the *Value Line* universe of stocks), they receive the *weighted average* market return, not the *median* market return. If Mr. Breuning were to use the market capitalization weighted average, his expected market return using *Value Line* data for the companies in the S&P 500 Index would be 15.23 percent (for all dividend paying companies) and 12.20 percent (based on the FERC exclusions for outlier growth rates), as shown in my updated ROE analysis, Exhibit JCN-3R.

80 Direct Testimony of Drew Breuning, Exhibit No. 2, Schedule 17.

81 Direct Testimony of Drew Breuning, at 35. [Emphasis added.]

82 The Value Line Investment Survey, Part 1 Summary & Index, January 16, 2026, at 1. [Emphasis added.]

3. CAPM Adjustments and Conclusion

Q. IF REASONABLE ADJUSTMENTS ARE MADE TO MR. BREUNING'S CAPM ANALYSIS, HOW DOES IT AFFECT THE RESULTS OF HIS ANALYSIS?

A. As I explained previously, I recommend the Commission not give any weight to Mr. Breuning's Kroll-based CAPM ROE estimate of 8.55 percent because it is lower than any authorized ROE for a gas distribution company since at least 1980. Accordingly, I do not make any adjustments to that estimate. Modest adjustments can be made to Mr. Breuning's "forecasted CAPM analysis" to produce more reasonable results. Specifically, with reasonable adjustments to Mr. Breuning's risk-free rate and forward-looking market return, the results of his CAPM analysis range from 10.59 percent to 11.77 percent. Please see Exhibit JCN-6R for the specific calculations.

D. Relevance of the Bond Yield Plus Risk Premium Analysis

Q. PLEASE SUMMARIZE MR. BREUNING'S CONCERNS WITH THE RISK PREMIUM MODEL.

A. Mr. Breuning describes the Risk Premium approach as a "simplified version of the CAPM," he states that the "RP method does not measure the specific risk of a company," and he claims that it assumes that "the equity risk premium is constant over time."[83] He also states the following about risk premium based models more generally: "The CAPM, and similarly the RP method, are less reliable indicators because they

83 Direct Testimony of Drew Breuning, at 23 and 28.

measure the cost of equity indirectly and risk premiums vary depending on the debt and equity being compared."[84]

Q. HOW DO YOU RESPOND TO MR. BREUNING'S CONCERNS?

A. The Risk Premium analysis provides another useful perspective on investors' required return for NFGDC. I do not agree with Mr. Breuning that the Bond Yield Plus Risk Premium analysis is duplicative of the CAPM method, but I do agree that the Risk Premium model does not measure the specific risk of a company. While both models use a risk-free rate to anchor the return estimate, the CAPM analysis applies an industry specific Beta coefficient to the total market return to estimate the risk premium required by investors in gas distribution utilities such as NFGDC, whereas the Risk Premium model is based on the assumption that there is an inverse relationship between Treasury bond yields and the ERP, as shown by hundreds of authorized ROEs set by utility regulators across the country since 1992. However, the ERP is not assumed to be constant over time. Rather, my Risk Premium model is based on a regression equation where the ERP varies with the level of interest rates on Treasury bonds.

Q. PLEASE ELABORATE ON HOW YOUR RISK PREMIUM MODEL DIFFERS FROM THE STATIC APPROACH DESCRIBED BY MR. BREUNING.

A. As discussed in my Direct Testimony, there is a well-established inverse relationship between equity risk premiums and prevailing risk-free rates. In fact, academic studies

84 *Id*, at 27.

have consistently shown that the two are inversely related.[85] Consistent with such studies, my Risk Premium analysis, shown in Exhibit JCN-7, is supported by a statistically significant regression equation that evaluates the relationship between bond yields and allowed ROEs for natural gas utilities. More specifically, the regression equation has an adjusted R^2 of approximately 0.82, meaning that 82 percent of variability in the risk premium is explained by changes in interest rates. This demonstrates that the regression equation can be reliably used to predict the risk premium at different levels of interest rates and the Risk Premium analysis is an appropriate model for determining a reasonable ROE for NFGDC. Furthermore, as shown in Exhibit JCN-7 of my Direct Testimony, when Treasury bond yields were last near current levels in the fourth quarter of 2006 and the first quarter of 2007, the average authorized ROE for gas distribution utilities nationwide ranged from 10.14 percent to 10.52 percent.

Q. MR. BREUNING ALSO ASSERTS THAT YOU ARE AWARE THAT THE COMMISSION HAS NOT RELIED ON THE RISK PREMIUM MODEL IN PRIOR DECISIONS. WHAT IS YOUR RESPONSE?

A. I recognize that the Commission has not relied on the results of the Risk Premium model to establish the authorized ROE for regulated utilities in recent years. However, to the extent the Commission were to consider average authorized ROEs as a relevant

85 *See, e.g.*, Robert S. Harris and Felicia C. Marston, *Estimating Shareholder Risk Premia Using Analysts' Growth Forecasts*, Financial Management, (Summer 1992), at 63-70; Eugene F. Brigham, Dilip K. Shome, and Steve R. Vinson, *The Risk Premium Approach to Measuring a Utility's Cost of Equity*, Financial Management, (Spring 1985), at 33-45; and Farris M. Maddox, Donna T. Pippert, and Rodney N. Sullivan, *An Empirical Study of Ex Ante Risk Premiums for the Electric Utility Industry*, Financial Management, (Autumn 1995), at 89-95.

benchmark, the Risk Premium approach provides additional context for the prevailing capital market conditions at the time ROEs were determined. Further, other state regulators have placed weight on the results of the Risk Premium model in setting authorized returns for utilities under their jurisdiction. These include the following states: California, Florida, Georgia, North Carolina, Virginia, West Virginia, and Wisconsin. In my view, the Risk Premium model provides another relevant perspective on investors' return requirements for gas distributors and should be used by the Commission to inform its decision on the authorized ROE for NFGDC in this proceeding.

Q. DESPITE MR. BREUNING'S CRITICISM OF THE RISK PREMIUM APPROACH, HIS THIRD "MODEL" IS BASED ON THE NATIONAL AVERAGE AUTHORIZED ROE FOR GAS DISTRIBUTION COMPANIES. WHAT IS YOUR RESPONSE?

A. A prevailing principle in setting just and reasonable rates is that the return must be comparable to returns available to investors in companies with a similar risk level. Through that lens, authorized ROEs for natural gas utilities are a relevant benchmark that investors consider. For example, investment bank UBS refers to the relationship between 10-year Treasury bonds and authorized returns for regulated utilities, noting that current authorized ROEs are lower than what is indicated by that regression equation.[86] I agree with Mr. Breuning that authorized returns in other jurisdictions are relevant data that investors consider in setting their return requirements for gas

86 UBS Global Research and Evidence Lab, 2024 Outlook: A Year for Resolutions and Resolve, December 12, 2023, at 10.

distribution companies like NFGDC. However, the Risk Premium model that I have applied reflects the inverse relationship between interest rates and the ERP, while Mr. Breuning's third "model" is not really a model at all, but simply an average of recent authorized ROEs. It is not clear why Mr. Breuning criticizes my Risk Premium approach when it is based on the same authorized ROE data that he believes is reasonable as an estimate of the authorized ROE for NFGDC.

Q. WHAT IS YOUR CONCLUSION REGARDING THE RISK PREMIUM ANALYSIS?

A. The Risk Premium analysis is based on authorized returns for gas utilities spanning more than three decades of varying capital markets and economic cycles, and depends on a statistically significant relationship between allowed ROEs and interest rates that is consistent with academic studies. In addition, the Risk Premium approach provides stability to the CAPM and DCF results, which can vary widely based on market conditions and user-specified inputs and assumptions. As such, I continue to consider the results of the Risk Premium analysis in developing my ROE recommendation.

Q. WITH REASONABLE ADJUSTMENTS, DOES MR. BREUNING'S ROE ANALYSES PRODUCE AN ROE ESTIMATE FOR NFGDC THAT IS SIMILAR TO YOUR ANALYSIS AND RECOMMENDATION?

A. Yes. As discussed above, and as summarized in Figure 10, reasonable adjustments can be made to Mr. Breuning's DCF and CAPM analyses that result in an ROE estimate for NFGDC that is generally consistent with my analyses. Specifically, I have added the results for Southwest Gas and Spire to Mr. Breuning's DCF analysis, adjusted his CAPM inputs for the risk-free rate and the forward-looking market risk premium, and

discarded the results of his CAPM analysis using Kroll's projected ERP and the national average authorized ROEs for gas distribution companies. With these adjustments, the average results for Mr. Breuning's ROE analyses range from 10.93 percent to 11.52 percent, which overlaps my analyses and recommendation. See Exhibits JCN-6R and JCN-7R for more details.

FIGURE 10: SUMMARY OF ADJUSTED ROE RESULTS – BREUNING

Model	As Filed	As Adjusted
Constant Growth DCF	10.47%	11.26%
CAPM – Forward ERP	9.95%	10.59% - 11.77%
CAPM – Kroll ERP	8.55%	N/A
Average Authorized ROEs for gas LDCs	9.70%	N/A
Average	9.81%	10.93% - 11.52%

E. Other Considerations

Q. PLEASE SUMMARIZE MR. BREUNING'S TESTIMONY REGARDING THE BUSINESS RISK OF NFGDC AND THE IMPLICATIONS FOR THE COMPANY'S AUTHORIZED ROE IN THIS PROCEEDING.

A. Mr. Breuning concludes that NFGDC does not have greater than average business risk due to the Company's elevated capital expenditure program, smaller size relative to the proxy group, and customer concentration risk.[87] I will respond to each of these points

87 Direct Testimony of Drew Breuning, at 46-49.

in this section, starting with the effect of NFGDC's projected capital expenditures on its risk profile.

Q. MR. BREUNING CHALLENGES THE NOTION THAT NFG'S ELEVATED CAPITAL SPENDING PROGRAM SUPPORTS A HIGHER AUTHORIZED ROE FOR THE COMPANY.[88] WHAT IS YOUR RESPONSE?

A. Mr. Breuning asserts that all gas distribution companies are facing the issues of upgrading or replacing aging infrastructure, that NFGDC has the opportunity to file a rate case at any time to address revenue inadequacy, and that the Commission offers risk reducing mechanisms such as the Distribution System Improvement Charge ("DSIC") and the FPFTY to help reduce regulatory lag in recovery of infrastructure investments or other unforeseen expenditures. As explained below, Mr. Breuning's position does not compare the Company to its peers on these points.

As discussed in my Direct Testimony, NFGDC is planning to spend approximately $185 to $205 million on capital expenditures in 2026.[89] The Company will require continued access to external debt and equity capital on favorable terms and conditions to fund its capital program. Credit rating agencies such as Moody's Ratings and S&P Global Ratings have commented on the risk associated with heightened capital program as one of its key credit challenges for regulated utilities, as described in my Direct Testimony.[90]

88 *Id*., at 46.

89 Direct Testimony of Joshua C. Nowak, at 41.

90 *Id.*, at 42-43.

Q. MR. BREUNING DISAGREES WITH YOUR POSITION THAT NFGDC'S SMALLER SIZE RELATIVE TO THE PROXY GROUP COMPANIES IS A RISK FACTOR THAT WOULD CAUSE EQUITY INVESTORS TO REQUIRE A HIGHER RETURN. WHAT IS YOUR RESPONSE?

A. Although Mr. Breuning acknowledges that I did not recommend a small size adjustment for NFGDC, he argues against the small size effect, noting that any expense impact due to the lesser buying power of a smaller utility is reflected in the revenue requirement and the dollar-for-dollar recovery that applies to expenses. According to Mr. Breuning, a size premium for a smaller utility would only duplicate the burden on ratepayers. Mr. Breuning also observes that the Commission has rejected the application of a size adjustment to the cost of equity. As support for his position, he cites an article by Dr. Annie Wong that he claims demonstrates that the small size effect does not apply to utilities.[91]

In response to Mr. Breuning's testimony regarding academic literature, as discussed in my Direct Testimony, academic literature recognizes that smaller companies tend to be rewarded with higher total returns than larger companies, even after the relative illiquidity of smaller company is taken into account.[92] For example, a 2011 article by Chrétien and Coggins found that the small size effect was observed for the regulated utility industry specifically.

Morningstar, the original publisher of the size study that is now published by Kroll, explains that investors in small stocks do not always earn returns that are higher

91 Direct Testimony of Drew Breuning, at 46-48.

92 Direct Testimony of Joshua C. Nowak, at 44.

than returns earned from large stocks – and that is precisely why small stocks are riskier, *by definition*.

> Because investors cannot predict when small-cap returns will be higher than large-cap returns, it has been argued that they do not expect higher rates of return for small stocks. As was illustrated earlier in this chapter, even over periods of many years, investors in small stocks do not always earn returns that are higher than those of investors in large stocks. **By simple definition, one cannot expect risky companies to always outperform less-risky companies; otherwise they would not be risky. Over the long-term, however, investors do expect small stocks to outperform large stocks**.[93]

In the 2023 SBBI Yearbook, Kroll further explains that the risk/return profile must be assessed over long term periods, not short-term periods (emphasis in original).

> The increased risk faced by investors in small stocks is quite real. It is important to note, however, that the risk/return profile is over the *long-term*. The long-term expected return for any asset class can be quite different from short-term expected returns. Investors in small-cap stocks should expect losses and periods of underperformance relative to large-cap stocks. While this might lead some market observers to speculate that there is no size premium, statistical evidence suggests that periods of smaller stocks' underperformance should be expected. The evidence also suggests that the longer small-cap companies are given to "race" against large-cap companies, the greater the chance that small-cap companies outpace their larger counterparts.[94]

Q. HAVE OTHER COMMISSIONS ACKNOWLEDGED THE NEED FOR A SMALL SIZE PREMIUM?

A. Yes, they have. For example, the FERC acknowledges the increased risk associated with a company's smaller size and incorporates Kroll's size premia adjustments in the CAPM analysis. In its determination in Docket Nos. EL14-12-003 and EL15-45-000, FERC stated that "size premium adjustments improve the accuracy of the CAPM

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93 Morningstar, Inc., 2015 Ibbotson Stocks, Bonds, Bills, and Inflation Classic Yearbook, at 112. [Emphasis added.]

94 Kroll 2023 SBBI Yearbook, at 147. [Emphasis added.]

results and cause it to better correspond to the cost of capital estimates employed by investors."[95] FERC has found that "sufficient amount of academic literature exists to indicate that many investors rely on the size premia."[96] Specifically, FERC was not persuaded by the Annie Wong article that Mr. Breuning cites, stating:

> We also agree with the Presiding Judge that the financial literature arguing against the continued existence of the size premium or its applicability to utilities is unavailing. **Specifically, we do not find persuasive the article cited by Professor Annie Wong that utilities are less risky than industrial stocks and feature betas that do not decrease with firm size.** Even if true, which the MISO TOs aver is not the case, the argument in favor of a size premium adjustment is that there are differences in risk and required returns between small and large companies that are not captured in the betas. Consequently, lack of substantial variance in the betas between large and small companies is not indicative that they feature differences in risk and corresponding returns that are the basis for the size premium adjustment. The subsequent endorsement of this phenomenon, by Dr. Morin, lends credence to the view that Professor Wong's conclusions are no longer state of the art. Furthermore, an article reconsiders Professor Wong's evidence and concludes that "new information…indicates that there is a small firm effect in the utility sector." A more recent article published in *Business Valuation Review* found that "none of the academic papers throughout the last three decades have qualified the [size premium] as a statistical error." Finally, a 2019 National Association of Certified Valuators and Analysts publication supports the use of the size premium adjustment to the CAPM. We thus find that, based on the evidence of this dynamic and that many investors consider it when evaluating companies, it is appropriate to include it in CAPM determinations.[97]

FERC recently reaffirmed this determination in Opinion No. 594:

> We also find there to be insufficient reason to conclude that the utility industry is unique in such a way as to render the size adjustment inapplicable, as certain intervenors suggest. The size premium adjustment is supported by a robust data set. Although the variations in the risk profiles of firms in any industry inevitably vary to some degree, we do not see sufficient evidence in the record to conclude that factors specific to the utility industry insulate smaller utilities from risks such

95 169 FERC ¶ 61,129 at 149, paragraph 297.

96 *Id*. at 149, paragraph 299.

97 *Id*. at 150, paragraph 301 (citations omitted). [Emphasis added.]

that the CAPM betas sufficiently account for any increased risks and corresponding returns demanded by investors.[98]

Although I have not made a specific adjustment to reflect the Company's small size, it is apparent that the risks associated with NFGDC's small size relative to the proxy group is an important factor in determining the Company's cost of equity and remains an important consideration by investors and regulators.

Q. MR. BREUNING ASSERTS THAT NFGDC DOES NOT FACE HIGHER RISK DUE TO CUSTOMER CONCENTRATION. DO YOU AGREE?

A. Mr. Breuning claims that every gas utility faces the same issues of changing economic and market conditions, and that NFGDC has the option to file a base rate case at any time to address revenue inadequacy due to loss of customers or subsequent loss of revenues. [99]

Mr. Breuning overlooks the evidence presented in my Direct Testimony regarding NFGDC's customer concentration risk and the effect on the Company of potentially losing a large customer.[100] While I am not aware of NFGDC experiencing the loss of a large customer in recent years, that does not change the fact that this remains an important risk for the Company and its investors. While I agree with Mr. Breuning that other gas utilities face risks related to changing economic and market conditions, those risks are more acute for NFGDC due to the fact that approximately 40 percent of the Company's sales volumes in 2024 were derived from industrial

98 194 FERC ¶ 61,208, Paragraph 257.

99 Direct Testimony of Drew Breuning, at 49.

100 Direct Testimony of Joshua C. Nowak, at 48-52.

customers and the Company's smaller size, which magnifies the risk around customer concentration. These risks have, in fact, increased since my Direct Testimony filed in January 2026. As previously discussed, the ongoing conflict in the Middle East has increased the instability and uncertainty of economic conditions around the world. As Fitch Ratings notes, "an adverse war scenario points to the potential for broad demand weakness across sectors, largely due to second-order effects on the global economy. Consumer-oriented sectors and those more vulnerable to fuel prices and interest rates face the greatest exposure."[101] Accordingly, the impact of these challenging conditions is twofold: not only does NFGDC face direct exposure to heightened economic and geopolitical uncertainty, but the Company also faces indirect risk through its industrial customers, who may curtail operations or reduce consumption in response to slowing demand. Similarly, in S&P's recent commentary regarding the credit effects of the Middle East Conflict, the agency noted, "Agribusiness, chemicals, metals and mining, oil and gas, and transportation are key U.S. corporate sectors feeling the direct effects from the war. However, prolonged supply chain disruptions that push up input prices and drag down demand could have meaningful impacts on a boarder set of factors."[102] S&P updated its commentary on April 30, 2026, stating:

> As oil shortages persist, second and third order effects are becoming more pronounced, weighing on manufacturing activity, transportation, consumer confidence, and public finances. These dynamics are inherently nonlinear: Prolonged disruption, even without military

101 FitchRatings, "Prolonged Iran War Raises Demand Risks for US Corporates," March 30, 2026.

102 S&P Global Ratings, "Credit Conditions North America: U.S. Macro And Credit Effects Of The Middle East Conflict," March 13, 2026.

> escalation, materially increases the risk that a transitory shock evolves into a more persistent drag on growth and credit conditions.[103]

In addition, Mr. Breuning's purported solution of NFGDC filing a base rate case to address revenue deficiencies is an after-the-fact solution that does not protect the Company against the loss of earnings and cash flows until new rates are approved and go into effect. NFGDC cannot get those lost earnings and cash flows back, even if higher rates are approved going forward. That is a risk that debt and equity investors cannot ignore.

VIII. RESPONSE TO OCA WITNESS RENO'S RECOMMENDATION ON THE COST OF CAPITAL

Q. PLEASE SUMMARIZE MS. RENO'S COST OF CAPITAL RECOMMENDATIONS.

A. Ms. Reno conducts three variations of the Constant Growth DCF model to arrive at an ROE recommendation of 9.74 percent, the midpoint of her ROE range of 8.88 percent to 10.61 percent. Ms. Reno's ROE recommendation of 9.74 percent is contingent with a proposed hypothetical equity ratio of 50.00 percent. Ms. Reno also conducts three variations of the CAPM as a "check on the reasonableness" of her DCF results; her CAPM results yield a midpoint of 8.99 percent. Ms. Reno also proposes an alternative ROE recommendation of 9.21 percent if the Commission adopts the Company's requested equity ratio of 56.40 percent.

[103] S&P Global Ratings, "Special Update: Time Compounds The Credit Implications Of The War," April 30, 2026.

Q. WHAT ARE THE PRINCIPLE DIFFERENCES BETWEEN YOUR AND MS. RENO'S ANALYSES?

A. While Ms. Reno and I both employ the DCF and CAPM methodologies, along with the same proxy group, there are three key areas in which I disagree with Ms. Reno's ROE analyses: (1) reliance on dividend per share ("DPS"), book value per share ("BVPS") growth rates, and the sustainable growth method in the DCF analyses; (2) market risk premium inputs in the CAPM approach; and (3) assessment of Ms. Reno's alternative ROE based on her flawed application of the Hamada model.

A. Application of the DCF Model

Q. PLEASE SUMMARIZE MS. RENO'S APPLICATION OF THE DCF APPROACH.

A. Ms. Reno develops three DCF-based ROE estimates ranging from 8.88 percent to 10.61 percent. Ms. Reno derives the dividend yield in her DCF model as the annual dividend per share over the next 12 months, divided by the stock price average for the 30- and 90-calendar day average of closing stock prices as of February 27, 2026.[104] In her first set of growth rates in the DCF model, Ms. Reno employs the EPS growth rates published by *Value Line*, S&P, and Zacks.[105] The average expected earnings growth rate in her first set is 7.92 percent, with median DCF results of 10.48 percent and 10.61 percent.[106] In her second DCF approach, Ms. Reno "refines" her calculation by averaging the *Value Line* dividends per share ("DPS"), and book value per share

104 Direct Testimony of Maureen L. Reno, at 43.

105 *Id*., at 44.

106 *Id*., at 44.

("BVPS") estimates with the EPS growth rates, weighted equally.[107] Ms. Reno's second set of growth rates produce an average growth rate of 5.45 percent, with median DCF results of 8.88 percent and 9.03 percent, based on the 30- and 90-day average stock price, respectively.[108] Ms. Reno derives her third and final DCF estimate employing the sustainable growth method to estimate the dividend growth rate. Ms. Reno relies on *Value Line's* retention ratios ("*b*") and five-year horizon ROEs ("*r*") to calculate the expected internal growth component ("*br"*), and the external financing growth rate ("*sv*") using *Value Line's* data to derive the market-to-book ratio and expected growth in the number of outstanding shares.[109] Ms. Reno's sustainable growth DCF produces an average sustainable growth rate of 6.87 percent and 6.67 percent, and median ROE estimates of 9.87 percent and 10.03 percent, based on the 30- and 90-day average stock prices, respectively.[110]

Q. ARE THERE AREAS OF THE DCF ANALYSIS WITH WHICH YOU AND MS. RENO AGREE?

A. Yes. As mentioned above, Ms. Reno and I employ the same proxy group in our analysis. Notably, Ms. Reno presents her results with the inclusion of Spire, Inc. Additionally, Ms. Reno and I both calculate the expected dividend yield by applying one half of the expected growth rate to the current dividend yield.[111] Ms. Reno and I

107 *Id.*
108 *Id.*, at 45.
109 *Id.,* at 47.
110 *Id.*, at 48-49.
111 *Id.*, at 44.

also both rely on EPS growth rates from *Value Line*, S&P, and Zacks in the Constant Growth DCF models.

Q. DO YOU AGREE WITH MS. RENO THAT YOU SHOULD HAVE CONSIDERED ADDITIONAL GROWTH RATES SUCH AS *VALUE LINE'S* DIVIDEND GROWTH AND BOOK VALUE GROWTH RATE PROJECTIONS IN YOUR DCF ANALYSIS?[112]

A. No, I do not. As explained in my Direct Testimony, projected earnings growth is superior to other growth rate estimates. First, growth in dividends occurs primarily as a result of growth in earnings.[113] Further, several academic studies indicate that investors base their investment decisions on analysts' expectations of growth in earnings,[114] and that analysts' consensus earnings forecasts are better at predicting the valuation of common stocks.[115] I am not aware of any similar findings regarding dividend- or book value-based growth estimates. Lastly there are no sources of which I am aware that publish consensus estimates of projected dividend growth; *Value Line's* estimates are not considered to reflect a consensus of a variety of analysts' projections, as are those published by S&P Capital IQ and Zacks. As Ms. Reno concedes, "The S&P MI and Zacks websites report results incorporating forward-looking surveys of

112 *Id*., at 46, 49.

113 Direct Testimony of Joshua C. Nowak, at 31-32.

114 *Id*.

115 *See, e.g*., Andreas C. Christofi, Petros C. Christofi, Marcus Lori and Donald M. Moliver, *Evaluating Common Stocks Using Value Line's Projected Cash Flows and Implied Growth Rate*, Journal of Investing (Spring 1999); Robert S. Harris and Felicia C. Marston, *Estimating Shareholder Risk Premia Using Analysts' Growth Forecasts*, Financial Management at 21 (Summer 1992); James H. Vander Weide and Willard T. Carleton, *Investor Growth Expectations: Analysts vs. History*, The Journal of Portfolio Management (Spring 1988); Robert S. Harris, *Using Analysts' Growth Forecasts to Estimate Shareholder Required Rate of Return*, Financial Management (Spring 1986).

securities analysts' EPS projections. *Value Line*, in contrast, … is not a survey."[116] Furthermore, my reliance on EPS growth rate projections is in line with the approach adopted by I&E Witness Mr. Breuning.[117] If there were a demand for consensus dividend growth projections from the financial community, there would likely be several widely available sources publishing dividend growth rate projections. Because that is not the case, it supports the position that earnings growth is the most meaningful measure of growth among the investment community.[118]

Ms. Reno's Constant Growth DCF results derived using her combined dividend, earnings, and book value growth assumptions produce ROE estimates that fall 12 to 27 basis points below the lowest authorized ROE for natural gas distribution companies since at least 2024.[119] Thus, these estimates fail to satisfy the *Hope* and *Bluefield* comparable return standard. Accordingly, Ms. Reno's reliance on these growth assumptions, and her recommendation that I adopt them in my own analysis, should be disregarded.

Q. DO YOU AGREE WITH MS. RENO'S APPLICATION OF THE CONSTANT GROWTH DCF MODEL USING SUSTAINABLE GROWTH RATES?

A. No, I do not. In her sustainable growth DCF approach, Ms. Reno relies on *Value Line's* projected ROE for the proxy group companies.[120] The average projected ROE of the

116 Direct Testimony of Maureen L. Reno, at 44.

117 Direct Testimony of Drew Breuning, at 31.

118 Direct Testimony of Joshua C. Nowak, at 32.

119 Source: Regulatory Research Associate. The lowest ROE authorized for natural gas distribution companies since 2024, excluding limited-issue riders, was 9.15 percent for Connecticut Natural Gas Company and The Southern Connecticut Gas Companies, authorized in November 2024.

120 Direct Testimony of Maureen L. Reno, at 47, and Schedule MLR-6a through MLR-6f.

proxy group, 10.35 percent, is approximately 30 to 50 basis points higher than the results of Ms. Reno's sustainable growth DCF approach, (*i.e.,* 9.87 percent and 10.03 percent using the 30- and 90-day average stock periods, respectively). This significant deviation demonstrates the fact that investors are expecting to earn higher returns on equity from the proxy group than what is derived from the sustainable growth DCF model.

Moreover, the sustainable growth rate calculation assumes that future earnings will increase as the retention ratio increases. However, this relationship may not hold for a given company based on management decisions associated with the dividend payout rate. This conclusion is supported by two articles published in the Financial Analysts Journal that discussed the theory that high dividend payouts (*i.e.,* low retention ratios) are associated with low future earnings growth.[121] Each of those articles cited a 2003 study by Arnott and Asness[122] that found, over the course of 130 years of data, future earnings growth is associated with high, rather than low payout ratios.[123] Specifically, Arnott and Asness concluded:

> Unlike optimistic new-paradigm advocates, we found that low payout ratios (high retention rates) historically precede low earnings growth. This relationship is statistically strong and robust. We found that the empirical facts conform to a world in which managers possess private information that causes them to pay out a large share of earnings when they are optimistic that dividend cuts will not be necessary and to pay out a small share when they are pessimistic, perhaps so that they can be

121 Ping Zhou, William Ruland, *Dividend Payout and Future Earnings Growth*, Financial Analysts Journal, Vol. 62, No. 3, 2006. *See* also Owain ap Gwilym, James Seaton, Karina Suddason, Stephen Thomas, *International Evidence on the Payout Ratio, Earnings, Dividends and Returns*, Financial Analysts Journal, Vol. 62, No. 1, 2006.

122 Robert Arnott, Clifford Asness, *Surprise! Higher Dividends = Higher Earnings Growth*, Financial Analysts Journal, Vol. 59, No. 1, January/February 2003.

123 Since the payout ratio is the inverse of the retention ratio, the authors found that future earnings growth is negatively related to the retention ratio.

> confident of maintaining the dividend payouts. Alternatively, the facts also fit a world in which low payout ratios lead to, or come with, inefficient empire building and the funding of less than-ideal projects and investments, leading to poor subsequent growth, whereas high payout ratios lead to more carefully chosen projects. The empire-building story also fits the initial macroeconomic evidence quite well. At this point, these explanations are conjectures; more work on discriminating among competing stories is appropriate.[124]

Given that these studies found that there is a negative relationship between earnings growth and retention ratios, the theory underlying Ms. Reno's sustainable growth rates in the DCF model does not hold and these results should be dismissed.

In addition, the sustainable growth model requires the analyst to estimate four separate variables rather than relying on a single estimate of projected growth. The result is that the potential for bias and error increases as the analyst must assess and estimate four inputs rather than one. As Dr. Roger Morin explains:

> There are three problems in the practical application of the sustainable growth method. The first is that it may be even more difficult to estimate what b, r, s, and v, investors have in mind than it is to estimate what g they envisage. It would appear far more economical and expeditious to use available growth forecasts and obtain g directly instead of relying on four individual forecasts of the determinants of such growth. It seems only logical that the measurement and forecasting errors inherent in using four different variables to predict growth far exceed the forecasting error inherent in a direct forecast of growth itself.[125]

Further, Dr. Morin notes that the empirical financial literature demonstrates that the retention growth methodology is not strongly correlated to measures of stock value, such as stock prices and price/earnings ratios. Dr. Morin concludes that the retention growth method is the "weakest" of the three common measures of growth applied in

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124 Robert Arnott, Clifford Asness, *Surprise! Higher Dividends = Higher Earnings Growth*, Financial Analysts Journal, Vol. 59, No. 1, January/February 2003.

125 Roger A. Morin, Ph.D., New Regulatory Finance, Public Utility Reports, Inc., at 306 (2006).

the DCF model "on both conceptual and empirical grounds."[126] In conclusion, the sustainable growth rates that Ms. Reno employs in her DCF model should not be given any weight.

B. Application of the CAPM Model

Q. PLEASE SUMMARIZE MS. RENO'S CAPM ANALYSIS AND RESULTS.

A. Ms. Reno calculates three estimates of the CAPM ROE. In two of her CAPM analyses, Mr. Reno applies the 30-day average of 30-year Treasury yields as of February 27, 2026 (*i.e.,* 4.76 percent). For her third CAPM ROE, Ms. Reno applies Kroll's Normalized Risk-Free Rate of 3.50 percent.[127] Across the three CAPM approaches, Ms. Reno varies the market risk premium using Kroll estimates (*i.e.,* historical large Stock ERP, supply-side ERP, and Kroll's Normalizes Rate). Finally, Ms. Reno relies on *Value Line* Beta coefficients for the proxy group companies for all three CAPM estimates. These methods result in CAPM estimates ranging from 7.43 percent to 10.55 percent, with a midpoint of 8.99 percent. Ultimately, Ms. Reno does not incorporate her CAPM ROE estimates but rather employs these results to "check on the reasonableness" of her DCF results.[128]

126 *Id*., at 307.

127 Direct Testimony of Maureen L. Reno, at 51.

128 *Id*., at 7, 50.

Q. DO YOU HAVE ANY HIGH-LEVEL PERSPECTIVES ON MS. RENO'S CAPM ANALYSIS?

A. Yes, I do. Mr. Reno does not appear to consider whether any of her estimates are too low. If Ms. Reno believes her estimates should be assessed for reasonableness, she should also acknowledge where her results are unreasonably low. In particular, Ms. Reno's CAPM estimates as low as 7.43 percent are well below any returns authorized for natural gas utilities for at least the past 46 years.

Q. ARE THERE AREAS OF THE CAPM ANALYSIS WITH WHICH YOU AND MS. RENO AGREE?

A. Yes, there are. First, Ms. Reno and I agree that the 30-year Treasury bond yield is appropriate to use as the risk-free rate.[129] Second, Ms. Reno and I both rely on *Value Line* Beta coefficients.[130]

Q. WHAT MARKET RISK PREMIUM ESTIMATES DOES MS. RENO USE IN HER CAPM ANALYSIS?

A. Ms. Reno applies three Kroll market risk premium estimates in her analysis: (1) Kroll's historic arithmetic average of real market returns over the period 1926 to 2025 (*i.e.,* 7.37 percent); (2) Kroll's supply-side market risk premium (*i.e.,* 6.31 percent); and (3) Kroll's Recommended U.S. ERP of 5.00 percent.

129 *Id*., at 51.

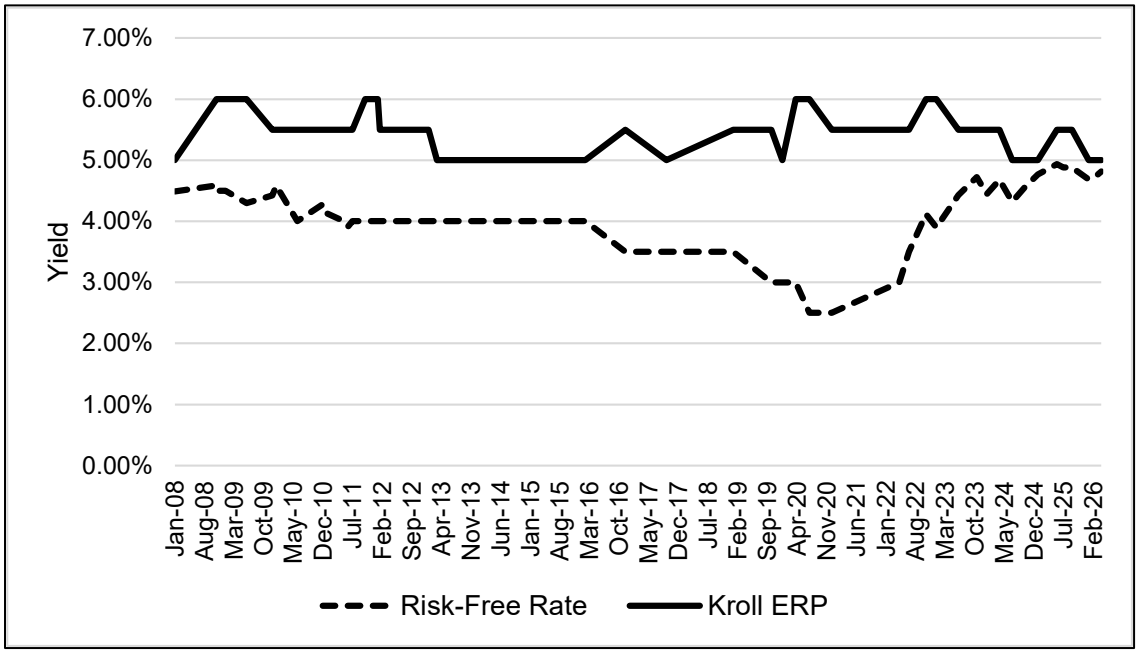
130 *Id*., at 54.

Q. WHAT IS YOUR CONCERN WITH THE USE OF KROLL MARKET RISK PREMIUM ESTIMATES MS. RENO CONSIDERS?

A. First, Ms. Reno's reliance on Kroll's recommended market risk premium estimate of 5.00 percent is a concern as it is not clear that Kroll develops its market risk premium in relation to its risk-free rate. The market risk premium is calculated as the difference between the expected market return and risk-free rate; therefore, it is a function of the expected market return and risk-free rate at a point in time. Consequently, the market risk premium and risk-free rate are not independent of each other, they are interrelated. In fact, academic studies have shown that the two are inversely related.[131] As the risk-free rate decreases, the market risk premium increases and vice versa. However, as shown in Figure 11 below, there is no clear relationship between Kroll's recommended ERP and risk-free rate. Whereas academic studies indicate that the two lines should move in opposite directions, Figure 11Figure 11 shows they do not.

131 *See, e.g.*, Robert S. Harris and Felicia C. Marston, *Estimating Shareholder Risk Premia Using Analysts' Growth Forecasts*, Financial Management, (Summer 1992), at 63-70.

FIGURE 11: KROLL RECOMMENDED EQUITY RISK PREMIUM AND RISK-FREE RATE (2008 -2026) [132]



The conclusion that there is no clear relationship between Kroll's variables is supported by statistical analysis. To assess whether there is a relationship, I performed a linear regression in which Kroll's recommended ERP was the dependent variable and the recommended risk-free rate was the independent variable. The R^2 was 0.02 percent, which means that Kroll's risk-free rate explains only 0.02 percent of the change in the ERP. This runs counter to the fundamental principle that the market risk premium is a function of the risk-free rate, as noted earlier. Moreover, the slope coefficient was not statistically significant, which means there is little confidence in the statistical results. This is not to suggest that Kroll is not a valid or credible source of data. Rather, it

132 Sources: Kroll Cost of Capital Navigator, Federal Reserve Bank of St. Louis FRED Economic Data.

suggests that the usefulness of Kroll's ERP recommendation at the current time is questionable given that it runs counter to academic and financial theory.

Q. DO YOU HAVE CONCERNS REGARDING MS. RENO'S REFERENCE TO KROLL'S "SUPPLY-SIDE" OR LONG-TERM HISTORICAL MARKET RISK PREMIUMS?[133]

A. Yes, I do. Ms. Reno's reliance on Kroll's "supply-side" or long-term historical market risk premiums relies on volatile historical data that does not accurately reflect forward-looking investor expectations, especially in volatile or evolving interest rate conditions. As discussed throughout my Direct and Rebuttal testimonies, estimating the cost of equity is inherently forward-looking and therefore requires the use of appropriate, forward-looking inputs.

Q. WHAT IS YOUR RESPONSE TO MS. RENO'S POSITION THAT YOUR FORWARD-LOOKING MARKET RISK PREMIUM IS INFLATED?[134]

A. I disagree. Ms. Reno's primary concern is the use of EPS growth rates in the calculation of the market risk premium. First, since the cost of equity is forward looking, the growth rates should also be forward looking. Second, my approach is widely used in utility regulatory proceedings and is consistent with the approach adopted by FERC, as I noted in my Direct Testimony.[135] Further, the S&P 500 is a widely referenced measure of market returns representative of the broader diversified equity market and is appropriate for the determination of investor expectations for equity returns. More

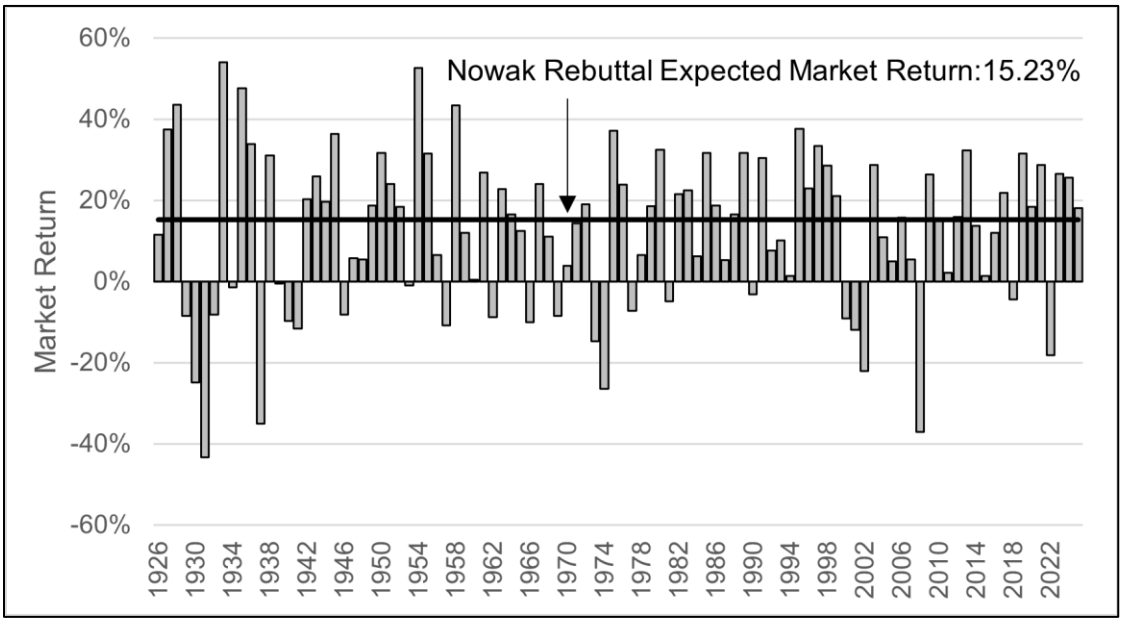
133 Direct Testimony of Maureen L. Reno, at 52.

134 Direct Testimony of Maureen L. Reno, at 55.

135 Direct Testimony of Joshua C. Nowak, at 35.

importantly, for consistency, the market index employed should closely correspond to the market index used to derive Beta coefficients, which is either the NYSE index in the case of *Value Line* or S&P 500 index in the case of Bloomberg.[136] Additionally, my forward-looking market return estimates, which are calculated based on (1) the S&P 500 Index expected market return, using *Value Line* EPS growth estimates; and (2) FERC's more conservative convention to consider only a subset of growth estimates between 0 percent and 20 percent, produce results of 15.23 percent and 12.20 percent, respectively. These estimates are highly consistent with actual returns over the last 100 years. As shown in Figure 12 Figure 12 below, since 1926, a forward-looking market return estimate of 15.23 percent or higher has occurred quite frequently.[137] In fact, a market return of at least 15.23 percent (*see,* Exhibit JCN-4R) has occurred in 50 of the last 100 years. From that perspective, my "ex ante" market return is not overstated.

FIGURE 12: ANNUAL TOTAL RETURN ON LARGE COMPANY STOCKS 1926-2026



136 Roger A. Morin, PhD., New Regulatory Finance, Public Utilities Reports, Inc. (2006) at 159-160.

137 Source: Kroll, 2023 SBBI Yearbook, at Appendix A-1 and Cost of Capital Navigator.

C. Relevance of the Bond Yield Plus Risk Premium Analysis

Q. HAS MS. RENO PRESENTED A BOND YIELD PLUS RISK PREMIUM ANALYSIS?

A. No, she has not. According to Ms. Reno, the Bond Yield Plus Risk Premium approach assumes a "simplistic inverse relationship without any regard to differences in investment risk," and does not incorporate "changes in the market's perception of investment risk of debt and equity securities."[138] Ms. Reno also asserts that the use of nominal interest rates in the Risk Premium analysis ignores the effect of inflation on risk premiums. Lastly, Ms. Reno argues that authorized ROEs reflect company-specific factors considered by commissions such as capital structure, credit ratings, and the individual performance of the utilities in the study.[139]

Q. WHY IS IT IMPORTANT FOR THE COMMISSION TO CONSIDER THE RISK PREMIUM RESULTS?

A. It is a widely accepted principle in regulatory finance, that the estimation of a just and reasonable return on equity requires the application of multiple methodologies, such that weaknesses in one methodology might be offset by the strengths of another. As I&E Witness Mr. Breuning notes, the Risk Premium method is one of the four methods commonly presented to estimate the cost of equity.[140] No methodology is perfect and when one places exclusive reliance on one methodology, the risk of estimation error

138 Direct Testimony of Maureen L. Reno, at 56.

139 *Id, at 57*

140 Direct Testimony of Drew Breuning, at 22.

increases. Dr. Morin, in New Regulatory Finance, provides the following explanation for the importance of using multiple methods for estimating the required equity return for a regulated utility.

> [T]here are no specific rules of infallible models for determining a fair rate of return. It is dangerous and inappropriate to rely on only one methodology in determining the cost of equity. The results from only one method are likely to contain a high degree of measurement error. The regulator's hands should not be bound to one methodology of estimating equity costs, nor should the regulator ignore relevant evidence and back itself into a corner. For instance, by relying solely on the DCF model at a time when the fundamental assumptions underlying the DCF model are tenuous, a regulatory body greatly limits its flexibility and increases the risk of authorizing unreasonable rates of return. The same is true for any one specific model.
>
> ********
>
> When measuring equity costs, which essentially deals with the measurement of investor expectations, no one single methodology provides a foolproof panacea. Each methodology requires the exercise of considerable judgment on the reasonableness of the assumption underlying the methodology and on the reasonableness of the proxies used to validate the theory. It follows that more than one methodology should be employed in arriving at a judgment on the cost of equity and that these methodologies should be applied across a series of comparable risk companies.[141]

The Bond Yield Plus Risk Premium analysis provides another perspective on investors' required return. As shown in my Bond Yield Plus Risk Premium analysis, there is a well-established inverse relationship between equity risk premiums and prevailing risk-free rates. Equity investors tend to require higher risk premiums during periods of lower interest rates. Thus, the current interest rate environment caused by the Federal Reserve's monetary policy intervention is not a reliable long-term indicator

141 Roger A. Morin, PhD., New Regulatory Finance, Public Utilities Reports, Inc. (2006) at 28.

of investment risk or the cost of capital in equity markets. Ms. Reno fails to recognize this inverse relationship between interest rates and the ERP in her analysis.

Q. HAVE OTHER STATE REGULATORY AGENCIES GIVEN WEIGHT TO THE RISK PREMIUM MODEL IN ESTABLISHING THE ALLOWED ROE FOR REGULATED UTILITIES UNDER THEIR JURISDICTION?

A. Yes. As discussed in my response to Mr. Breuning, several other state regulatory agencies have used the Risk Premium methodology to establish the authorized ROE for regulated electric and gas utilities. The Indiana Utility Regulatory Commission ("IURC"), for example, uses the midpoint of a range derived using several methodologies, including the Risk Premium analysis. The IURC states that "the use of multiple methods is desirable because no single method will produce the most reasonable results under all conditions and circumstances."[142] Similarly, the Maryland Public Service Commission states:

> Witnesses for BGE, Staff and OPC provided similar analytical methods for evaluating a just and reasonable ROE for the Company. For example, all the parties employed the DCF analysis and ECAPM methodology. Additionally, BGE used the utility risk premium analysis. Staff used a combination of the CAPM and ECAPM methodology and Build-Up method. OPC used additionally the two-step DCF analysis and risk premium analysis. We find all of these analytical tools helpful and will not rely on anyone to the exclusion of the others in making our decision.[143]

142 Indiana Utility Regulatory Commission, Docket No. Ca-44576, Indianapolis Power and Light, March 16, 2016, at 41.

143 Maryland Public Service Commission, Docket No. C-9326, Baltimore Gas and Electric Company, December 13, 2013, at 76.

In summary, the Risk Premium analysis, based on authorized returns for electric and gas utilities spanning three decades of varying capital markets and economic cycles, has been accepted in many states. I have observed over time that the Risk Premium approach provides stability relative to CAPM and DCF results, which can vary widely based on transitory market conditions and disagreement over specified assumptions.

Q. CAN REFINEMENTS TO THE INPUTS USED IN MS. RENO'S ROE METHODOLOGIES YIELD MORE REASONABLE ROE RESULTS?

A. Yes. Restricting Ms. Reno's DCF analyses to appropriate reliance on EPS growth rates and limiting her CAPM to results based on Kroll's long-term historical arithmetic ERP of 7.37 percent, although I generally do not support the use of historical inputs in CAPM, results in an average ROE estimate of 10.55 percent. In summary, these refinements increase the midpoint of her ROE results by approximately 80 basis points relative to her primary recommended ROE of 9.74 percent.

D. Other Considerations

Q. DO YOU AGREE WITH MS. RENO'S APPLICATION OF THE HAMADA MODEL IN IN DEVELOPING HER ALTERNATIVE ROE OF 9.21 PERCENT?[144]

A. No, I do not. Ms. Reno's application of the Hamada model to derive her "alternative" ROE is flawed based on her inputs and implementation, and does not satisfy the standards established in *Hope* and *Bluefield*. Ms. Reno's input of 50.00 percent as the

144 Direct Testimony of Maureen L. Reno, at 63-65.

"Proxy Equity Ratio" is fundamentally incorrect. As the name suggests, the "Proxy Equity Ratio" should be reflective of the market value of the equity ratio of the *proxy group*, not Ms. Reno's recommended equity ratio for NFGDC. Although the average *Value Line* equity ratios for the proxy group *holding companies* are not materially different from Ms. Reno's proposed hypothetical equity ratio, her approach is conceptually flawed. As discussed above, her inputs for the market risk premium are also flawed given her reliance on the average of Kroll's long-term historical, supply-side, and Normalized ERP, which are incompatible with the use of the current risk-free rate in the CAPM approach. Finally, while giving no weight to her CAPM in her primary ROE recommendation, Ms. Reno relies solely on the CAPM approach to derive her "alternative" ROE of 9.21 percent. Accordingly, her "alternative" ROE lacks a valid analytical foundation and should be disregarded.

Q. MS. RENO DISAGREES WITH YOUR "SIZE RISK ADJUSTMENT" AND ASSERTS THAT THE APPROPRIATE SIZE COMPARISON SHOULD BE BASED ON THE COMPANY'S PARENT, NFG.[145] HOW DO YOU RESPOND?

A. First, as Ms. Reno acknowledges, I "did not make a specific adjustment to reflect the Company's size."[146] While my recommended ROE is somewhat above the midpoint of my ROE recommended range, it considers the overall Company-specific risks, including the Company's capital expenditure program, customer concentration risk, and regulatory framework in addition to the Company's small size.[147] Further, Ms.

145 *Id.*, at 59.

146 *Id.*, at 57.

147 Direct Testimony of Joshua C. Nowak, at 40-54.

Reno's assertion that "the more appropriate analysis would be to compare the market capitalization of the parent company with the proxy group median"[148] is misguided. The rates set for NFGDC in this proceeding will apply to the Company on a stand-alone basis; therefore, its cost of equity – and the authorized ROE – must reflect its stand-alone risk profile as if it were a publicly traded entity. In other words, the authorized ROE must reflect the risks and prospects of the utility's operations and support the utility's integrity from a stand-alone perspective. While Ms. Reno contends that "[a]lthough NFGD acquires financing through its parent company, NFG, which has a lower credit rating than the proxy group, NFGD's lower debt ratio relative to the proxy group reduces its financial risk,"[149] she does not consistently apply this logic in her analysis. Simply, NFGDC's ownership structure, and therefore its source of capital, has no bearing on its cost of equity.

Q. IS THERE ADDITIONAL SUPPORT OF THE APPLICATION OF THE SIZE PREMIUM TO REGULATED UTILITIES?

A. Yes. In addition to my discussion in response to Mr. Breuning, it is important to note that Kroll's decile size study, which is derived from the CRSP database, includes all publicly traded companies on the New York Stock Exchange ("NYSE"), NYSE American ("NYSE MKT," a market for small capitalization stocks), and the NASDAQ, and thus includes electric and natural gas utility companies.[150] As such, contrary to Ms. Reno's assertion that I have failed to "acknowledge that smaller companies reflected

148 Direct Testimony of Maureen L. Reno, at 59.

149 *Id.*, at 35.

150 Kroll CRSP Deciles Size Study Methodology, Cost of Capital Navigator, pages 1-2.

in the SBBI database tend to be engaged in riskier businesses… which is not the case for… natural gas utility companies,"[151] utility companies are explicitly included in the CRSP universe used to construct Kroll's decile size groups.

Q. HOW DO YOU RESPOND TO MS. RENO'S CRITICISM REGARDING THE "DEMAND-RELATED RISK" THAT NFGDC FACES?[152]

A. Ms. Reno's criticism is unduly narrow in scope and fails to account for the full range of risks NFGDC may face during an economic downturn, particularly given the Company's substantial exposure to industrial customers. Although NFGDC's partial revenue decoupling mechanism is a constructive regulatory feature, common to approximately 91 percent of the proxy group operating companies, it does not fully insulate the Company from the need to recover fixed costs over a potentially smaller customer base. This dynamic increases the risk of unrecovered costs, and can place additional financial strain on the Company as reduced cash flows coincide with higher financing costs resulting from inflation and increases in interest rates.

Q. HOW DO YOU RESPOND TO MS. RENO'S CRITICISM REGARDING THE REGULATORY RISK THAT NFGDC FACES?

A. As described in my Direct Testimony, a utility's regulatory risk is a significant factor for investors to consider. Accordingly, investors assess the regulatory framework holistically across the regulatory mechanisms available to utilities facing similar risk. While a fully forecasted test year and weather normalization regulatory mechanisms

151 Direct Testimony of Maureen L. Reno, at 58-59.

152 *Id.*, at 33.

are constructive mechanisms for the Company, NFGDC has somewhat elevated regulatory risk due to limitations on its partial revenue decoupling and capital cost recovery mechanisms relative to its proxy group companies (*see,* Exhibit JCN-9). Notably, I do not make a specific adjustment to the ROE recommendation to account for NFGDC's regulatory risk.

IX. CONCLUSION

Q. WHAT IS YOUR CONCLUSION REGARDING A FAIR ROE FOR NFGDC?

A. Correcting Mr. Breuning and Ms. Reno's analyses to incorporate the appropriate inputs leads to ROE estimates that are consistent with those found in my analyses. Specifically, Mr. Breuning's average ROE results would increase by approximately 140 basis points to 11.22 percent, and Ms. Reno's average ROE results would increase by 81 basis points to 10.55 percent. These results are highly consistent with my updated range of analytical results, and are within my recommended ROE range. Similarly, my updated DCF, CAPM, and Bond Yield Risk Premium analyses continue to support the recommended ROE range of 10.30 percent to 11.30 percent. From within that range, and considering the Company's risk profile, I continue to recommend a base ROE of 11.00 percent. As previously discussed, the Company has withdrawn its request for an additional 25 basis point management efficiency fee due to consideration of the upward pressures associated with inflation and the impact on customers' bills.

Q. WHAT IS YOUR RECOMMENDATION WITH REGARD TO THE CAPITAL STRUCTURE FOR NFGDC?

A. I disagree with the use of a hypothetical capital structure and continue to support NFGDC's capital structure of 56.40 percent common equity and 43.60 percent long-term debt. These capital structures are within the range of the proxy group book and authorized equity ratios, and reflect the appropriate capital structure to support the Company's operations.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY AT THIS TIME?

A. Yes, it does.

NATIONAL FUEL EXHIBIT JCN-1R

SUMMARY OF RESULTS

Company	Ticker	*Primary Analyses*															**Average of DCF, CAPM, and Risk Premium**
		CONSTANT GROWTH DCF				**CAPM**							**Risk Premium (Average)**				
						Value Line Beta			Bloomberg Beta								
		30-Day Average	90-Day Average	180-Day Average	***Average***	Current Yield	Near-Term Projected Yield	Long-Term Projected Yield	Current Yield	Near-Term Projected Yield	Long-Term Projected Yield	***Average***	Current Yield	Near-Term Projected Yield	Long-Term Projected Yield	***Average***	
Atmos Energy Corporation	ATO	10.00%	10.12%	10.17%	**10.09%**	11.93%	11.93%	11.89%	11.20%	11.19%	11.14%	**11.55%**	10.47%	10.47%	10.39%	**10.44%**	**10.69%**
New Jersey Resources Corporation	NJR	10.40%	10.70%	10.85%	**10.65%**	11.48%	11.48%	11.43%	11.49%	11.49%	11.44%	**11.47%**	10.47%	10.47%	10.39%	**10.44%**	**10.85%**
NiSource Inc.	NI	10.11%	10.26%	10.31%	**10.23%**	12.38%	12.37%	12.34%	11.63%	11.63%	11.58%	**11.99%**	10.47%	10.47%	10.39%	**10.44%**	**10.89%**
Northwest Natural Holding Co.	NWN	10.68%	10.92%	11.17%	**10.92%**	11.93%	11.93%	11.89%	10.80%	10.80%	10.73%	**11.35%**	10.47%	10.47%	10.39%	**10.44%**	**10.90%**
ONE Gas Inc.	OGS	10.27%	10.45%	10.54%	**10.42%**	11.48%	11.48%	11.43%	11.31%	11.31%	11.26%	**11.38%**	10.47%	10.47%	10.39%	**10.44%**	**10.75%**
Southwest Gas Holdings, Inc.	SWX	13.95%	14.07%	14.17%	**14.06%**	11.93%	11.93%	11.89%	12.00%	11.99%	11.96%	**11.95%**	10.47%	10.47%	10.39%	**10.44%**	**12.15%**
Spire, Inc.	SR	13.03%	13.22%	13.37%	**13.21%**	11.48%	11.48%	11.43%	11.36%	11.36%	11.31%	**11.41%**	10.47%	10.47%	10.39%	**10.44%**	**11.69%**
Low		10.00%	10.12%	10.17%	**10.09%**	11.48%	11.48%	11.43%	10.80%	10.80%	10.73%	**11.35%**					**10.69%**
Median		10.40%	10.70%	10.85%	**10.65%**	11.93%	11.93%	11.89%	11.36%	11.36%	11.31%	**11.47%**	10.47%	10.47%	10.39%	**10.44%**	**10.89%**
Mean		11.20%	11.39%	11.51%	**11.37%**	11.80%	11.80%	11.76%	11.40%	11.40%	11.34%	**11.58%**	10.47%	10.47%	10.39%	**10.44%**	**11.13%**
High		13.95%	14.07%	14.17%	**14.06%**	12.38%	12.37%	12.34%	12.00%	11.99%	11.96%	**11.99%**					**12.15%**

SUMMARY OF RESULTS - EXCLUDING SPIRE INC.

Company	Ticker	*Primary Analyses*															**Average of DCF, CAPM, and Risk Premium**
		CONSTANT GROWTH DCF				**CAPM**							**Risk Premium (Average)**				
						Value Line Beta			Bloomberg Beta								
		30-Day Average	90-Day Average	180-Day Average	***Average***	Current Yield	Near-Term Projected Yield	Long-Term Projected Yield	Current Yield	Near-Term Projected Yield	Long-Term Projected Yield	***Average***	Current Yield	Near-Term Projected Yield	Long-Term Projected Yield	***Average***	
Atmos Energy Corporation	ATO	10.00%	10.12%	10.17%	**10.09%**	11.93%	11.93%	11.89%	11.20%	11.19%	11.14%	**11.55%**	10.47%	10.47%	10.39%	**10.44%**	**10.69%**
New Jersey Resources Corporation	NJR	10.40%	10.70%	10.85%	**10.65%**	11.48%	11.48%	11.43%	11.49%	11.49%	11.44%	**11.47%**	10.47%	10.47%	10.39%	**10.44%**	**10.85%**
NiSource Inc.	NI	10.11%	10.26%	10.31%	**10.23%**	12.38%	12.37%	12.34%	11.63%	11.63%	11.58%	**11.99%**	10.47%	10.47%	10.39%	**10.44%**	**10.89%**
Northwest Natural Holding Co.	NWN	10.68%	10.92%	11.17%	**10.92%**	11.93%	11.93%	11.89%	10.80%	10.80%	10.73%	**11.35%**	10.47%	10.47%	10.39%	**10.44%**	**10.90%**
ONE Gas Inc.	OGS	10.27%	10.45%	10.54%	**10.42%**	11.48%	11.48%	11.43%	11.31%	11.31%	11.26%	**11.38%**	10.47%	10.47%	10.39%	**10.44%**	**10.75%**
Southwest Gas Holdings, Inc.	SWX	13.95%	14.07%	14.17%	**14.06%**	11.93%	11.93%	11.89%	12.00%	11.99%	11.96%	**11.95%**	10.47%	10.47%	10.39%	**10.44%**	**12.15%**
Low		10.00%	10.12%	10.17%	**10.09%**	11.48%	11.48%	11.43%	10.80%	10.80%	10.73%	**11.35%**					**10.69%**
Median		10.34%	10.57%	10.69%	**10.53%**	11.93%	11.93%	11.89%	11.40%	11.40%	11.35%	**11.51%**	10.47%	10.47%	10.39%	**10.44%**	**10.87%**
Mean		10.90%	11.09%	11.20%	**11.06%**	11.86%	11.85%	11.81%	11.40%	11.40%	11.35%	**11.61%**	10.47%	10.47%	10.39%	**10.44%**	**11.04%**
High		13.95%	14.07%	14.17%	**14.06%**	12.38%	12.37%	12.34%	12.00%	11.99%	11.96%	**11.99%**					**12.15%**

NATIONAL FUEL EXHIBIT JCN-2R

30-DAY CONSTANT GROWTH DCF

Company	Ticker	[1] Annualized Dividend	[2] Stock Price	[3] Dividend Yield	[4] Expected Dividend Yield	[5] Value Line Earnings Growth	[6] S&P Cap. IQ Earnings Growth	[7] Zacks Earnings Growth	[8] Average Growth Rate	[9] Low ROE	[10] Mean ROE	[11] High ROE
Atmos Energy Corporation	ATO	$4.00	$183.95	2.17%	2.26%	8.00%	8.21%	7.00%	7.74%	9.25%	10.00%	10.48%
New Jersey Resources Corporation	NJR	$1.90	$54.15	3.51%	3.63%	5.00%	8.55%	n/a	6.78%	8.60%	10.40%	12.21%
NiSource Inc.	NI	$1.20	$46.46	2.58%	2.68%	7.50%	8.80%	6.00%	7.43%	8.66%	10.11%	11.50%
Northwest Natural Holding Co.	NWN	$1.97	$51.85	3.80%	3.93%	6.00%	7.50%	n/a	6.75%	9.91%	10.68%	11.44%
ONE Gas Inc.	OGS	$2.72	$86.17	3.16%	3.27%	6.00%	6.90%	8.10%	7.00%	9.25%	10.27%	11.38%
Southwest Gas Holdings, Inc.	SWX	$2.48	$87.26	2.84%	3.00%	n/a	12.70%	9.20%	10.95%	12.17%	13.95%	15.72%
Spire, Inc.	SR	$3.30	$90.95	3.63%	3.80%	8.50%	7.20%	12.00%	9.23%	10.96%	13.03%	15.85%
Median				3.16%	3.27%	6.75%	8.21%	8.10%	7.43%	9.25%	10.40%	11.50%
Mean				3.10%	3.22%	6.83%	8.55%	8.46%	7.98%	9.83%	11.20%	12.65%

Notes:
[1] Source: S&P Capital IQ
[2] Source: S&P Capital IQ, equals 30-day average as of March 31, 2026
[3] Equals [1] / [2]
[4] Equals [3] x (1 + 0.50 x [8])
[5] Source: Value Line
[6] Source: S&P Capital IQ
[7] Source: Zacks
[8] Equals Average ([5], [6], [7])
[9] Equals [3] x (1 + 0.50 x Minimum ([5], [6], [7]) + Minimum ([5], [6], [7])
[10] Equals [4] + [8]
[11] Equals [3] x (1 + 0.50 x Maximum ([5], [6], [7]) + Maximum ([5], [6], [7])

90-DAY CONSTANT GROWTH DCF

Company	Ticker	[1] Annualized Dividend	[2] Stock Price	[3] Dividend Yield	[4] Expected Dividend Yield	[5] Value Line Earnings Growth	[6] S&P Cap. IQ Earnings Growth	[7] Zacks Earnings Growth	[8] Average Growth Rate	[9] Low ROE	[10] Mean ROE	[11] High ROE
Atmos Energy Corporation	ATO	$4.00	$174.61	2.29%	2.38%	8.00%	8.21%	7.00%	7.74%	9.37%	10.12%	10.60%
New Jersey Resources Corporation	NJR	$1.90	$50.03	3.80%	3.93%	5.00%	8.55%	n/a	6.78%	8.89%	10.70%	12.51%
NiSource Inc.	NI	$1.20	$44.09	2.72%	2.82%	7.50%	8.80%	6.00%	7.43%	8.80%	10.26%	11.64%
Northwest Natural Holding Co.	NWN	$1.97	$48.82	4.04%	4.17%	6.00%	7.50%	n/a	6.75%	10.16%	10.92%	11.69%
ONE Gas Inc.	OGS	$2.72	$81.73	3.33%	3.44%	6.00%	6.90%	8.10%	7.00%	9.43%	10.45%	11.56%
Southwest Gas Holdings, Inc.	SWX	$2.48	$83.80	2.96%	3.12%	n/a	12.70%	9.20%	10.95%	12.30%	14.07%	15.85%
Spire, Inc.	SR	$3.30	$86.58	3.81%	3.99%	8.50%	7.20%	12.00%	9.23%	11.15%	13.22%	16.04%
Median				3.33%	3.44%	6.75%	8.21%	8.10%	7.43%	9.43%	10.70%	11.69%
Mean				3.28%	3.41%	6.83%	8.55%	8.46%	7.98%	10.01%	11.39%	12.84%

Notes:
[1] Source: S&P Capital IQ
[2] Source: S&P Capital IQ, equals 90-day average as of March 31, 2026
[3] Equals [1] / [2]
[4] Equals [3] x (1 + 0.50 x [8])
[5] Source: Value Line
[6] Source: S&P Capital IQ
[7] Source: Zacks
[8] Equals Average ([5], [6], [7])
[9] Equals [3] x (1 + 0.50 x Minimum ([5], [6], [7]) + Minimum ([5], [6], [7])
[10] Equals [4] + [8]
[11] Equals [3] x (1 + 0.50 x Maximum ([5], [6], [7]) + Maximum ([5], [6], [7])

180-DAY CONSTANT GROWTH DCF

Company	Ticker	[1] Annualized Dividend	[2] Stock Price	[3] Dividend Yield	[4] Expected Dividend Yield	[5] Value Line Earnings Growth	[6] S&P Cap. IQ Earnings Growth	[7] Zacks Earnings Growth	[8] Average Growth Rate	[9] Low ROE	[10] Mean ROE	[11] High ROE
Atmos Energy Corporation	ATO	$4.00	$171.11	2.34%	2.43%	8.00%	8.21%	7.00%	7.74%	9.42%	10.17%	10.65%
New Jersey Resources Corporation	NJR	$1.90	$48.24	3.94%	4.07%	5.00%	8.55%	n/a	6.78%	9.04%	10.85%	12.66%
NiSource Inc.	NI	$1.20	$43.20	2.78%	2.88%	7.50%	8.80%	6.00%	7.43%	8.86%	10.31%	11.70%
Northwest Natural Holding Co.	NWN	$1.97	$46.06	4.28%	4.42%	6.00%	7.50%	n/a	6.75%	10.41%	11.17%	11.94%
ONE Gas Inc.	OGS	$2.72	$79.64	3.42%	3.53%	6.00%	6.90%	8.10%	7.00%	9.52%	10.54%	11.65%
Southwest Gas Holdings, Inc.	SWX	$2.48	$81.31	3.05%	3.22%	n/a	12.70%	9.20%	10.95%	12.39%	14.17%	15.94%
Spire, Inc.	SR	$3.30	$83.39	3.96%	4.14%	8.50%	7.20%	12.00%	9.23%	11.30%	13.37%	16.19%
Median				3.42%	3.53%	6.75%	8.21%	8.10%	7.43%	9.52%	10.85%	11.94%
Mean				3.39%	3.53%	6.83%	8.55%	8.46%	7.98%	10.13%	11.51%	12.96%

Notes:
[1] Source: S&P Capital IQ
[2] Source: S&P Capital IQ, equals 180-day average as of March 31, 2026
[3] Equals [1] / [2]
[4] Equals [3] x (1 + 0.50 x [8])
[5] Source: Value Line
[6] Source: S&P Capital IQ
[7] Source: Zacks
[8] Equals Average ([5], [6], [7])
[9] Equals [3] x (1 + 0.50 x Minimum ([5], [6], [7]) + Minimum ([5], [6], [7])
[10] Equals [4] + [8]
[11] Equals [3] x (1 + 0.50 x Maximum ([5], [6], [7]) + Maximum ([5], [6], [7])

NATIONAL FUEL EXHIBIT JCN-3R

MARKET RISK PREMIUM DERIVED FROM S&P 500 - ALL COMPANIES

[1] Estimate of the S&P 500 Dividend Yield	1.24%
[2] Estimate of the S&P 500 Growth Rate	13.90%
[3] S&P 500 Estimated Required Market Return	15.23%

[1] Source: Confidential WP JCN-3R SP500 Total MRP 1
[2] Sum of Cap-Weighted Long-Term Growth Estimates
[3] Equals ([1] x (1 + 0.5 x [2])) + [2]

MARKET RISK PREMIUM DERIVED FROM S&P 500 - FERC METHODOLOGY

[1] Estimate of the S&P 500 Dividend Yield	1.45%
[2] Estimate of the S&P 500 Growth Rate	10.67%
[3] S&P 500 Estimated Required Market Return	12.20%

[1] Source: Confidential WP JCN-3R SP500 FERC MRP 2
[2] Sum of Cap-Weighted Long-Term Growth Estimates
[3] Equals ([1] x (1 + 0.5 x [2])) + [2]

NATIONAL FUEL EXHIBIT JCN-4R

CAPITAL ASSET PRICING MODEL - CURRENT RISK-FREE RATE, VALUE LINE BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - ALL COMPANIES
K = Rf + β (Rm − Rf)

Company	Ticker	[1] Current 30-day average of 30-year U.S. Treasury bond yield	[2] Beta (β)	[3] Market Return (Rm)	[4] Market Risk Premium (Rm − Rf)	[5] ROE (K)
Atmos Energy Corporation	ATO	4.80%	0.80	15.23%	10.42%	13.14%
New Jersey Resources Corporation	NJR	4.80%	0.75	15.23%	10.42%	12.62%
NiSource Inc.	NI	4.80%	0.85	15.23%	10.42%	13.66%
Northwest Natural Holding Co.	NWN	4.80%	0.80	15.23%	10.42%	13.14%
ONE Gas Inc.	OGS	4.80%	0.75	15.23%	10.42%	12.62%
Southwest Gas Holdings, Inc.	SWX	4.80%	0.80	15.23%	10.42%	13.14%
Spire, Inc.	SR	4.80%	0.75	15.23%	10.42%	12.62%
Median			0.80			13.14%
Mean			0.79			12.99%

Notes:
[1] Source: FRED, Federal Reserve Bank of St. Louis, 30-day average as of March 31, 2026
[2] Source: Value Line Reports
[3] Source: Exhibit JCN-3R, page 1
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- NEAR-TERM PROJECTED RISK-FREE RATE, VALUE LINE BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - ALL COMPANIES
K = Rf + β (Rm − Rf)

Company	Ticker	[1] Near-term projected 30-year U.S. Treasury bond yield (Q3 2026 - Q3 2027)	[2] Beta (β)	[3] Market Return (Rm)	[4] Market Risk Premium (Rm − Rf)	[5] ROE (K)
Atmos Energy Corporation	ATO	4.80%	0.80	15.23%	10.43%	13.14%
New Jersey Resources Corporation	NJR	4.80%	0.75	15.23%	10.43%	12.62%
NiSource Inc.	NI	4.80%	0.85	15.23%	10.43%	13.66%
Northwest Natural Holding Co.	NWN	4.80%	0.80	15.23%	10.43%	13.14%
ONE Gas Inc.	OGS	4.80%	0.75	15.23%	10.43%	12.62%
Southwest Gas Holdings, Inc.	SWX	4.80%	0.80	15.23%	10.43%	13.14%
Spire, Inc.	SR	4.80%	0.75	15.23%	10.43%	12.62%
Median			0.80			13.14%
Mean			0.79			12.99%

Notes:
[1] Source: Blue Chip Financial Forecasts, Vol. 45, No. 4, April 1, 2026 at 2
[2] Source: Value Line Reports
[3] Source: Exhibit JCN-3R, page 1
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- LONG-TERM PROJECTED RISK-FREE RATE, VALUE LINE BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - ALL COMPANIES
K = Rf + β (Rm − Rf)

Company	Ticker	[1] Projected 30-year U.S. Treasury bond yield (2027 - 2031)	[2] Beta (β)	[3] Market Return (Rm)	[4] Market Risk Premium (Rm − Rf)	[5] ROE (K)
Atmos Energy Corporation	ATO	4.60%	0.80	15.23%	10.63%	13.10%
New Jersey Resources Corporation	NJR	4.60%	0.75	15.23%	10.63%	12.57%
NiSource Inc.	NI	4.60%	0.85	15.23%	10.63%	13.63%
Northwest Natural Holding Co.	NWN	4.60%	0.80	15.23%	10.63%	13.10%
ONE Gas Inc.	OGS	4.60%	0.75	15.23%	10.63%	12.57%
Southwest Gas Holdings, Inc.	SWX	4.60%	0.80	15.23%	10.63%	13.10%
Spire, Inc.	SR	4.60%	0.75	15.23%	10.63%	12.57%
Median			0.80			13.10%
Mean			0.79			12.95%

Notes:
[1] Source: Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025 at 14
[2] Source: Value Line Reports
[3] Source: Exhibit JCN-3R, page 1
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- CURRENT RISK-FREE RATE, BLOOMBERG BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - ALL COMPANIES
K = Rf + β (Rm − Rf)

Company	Ticker	[1] Current 30-day average of 30-year U.S. Treasury bond yield	[2] Beta (β)	[3] Market Return (Rm)	[4] Market Risk Premium (Rm − Rf)	[5] ROE (K)
Atmos Energy Corporation	ATO	4.80%	0.72	15.23%	10.42%	12.28%
New Jersey Resources Corporation	NJR	4.80%	0.75	15.23%	10.42%	12.63%
NiSource Inc.	NI	4.80%	0.77	15.23%	10.42%	12.79%
Northwest Natural Holding Co.	NWN	4.80%	0.67	15.23%	10.42%	11.82%
ONE Gas Inc.	OGS	4.80%	0.73	15.23%	10.42%	12.42%
Southwest Gas Holdings, Inc.	SWX	4.80%	0.81	15.23%	10.42%	13.22%
Spire, Inc.	SR	4.80%	0.74	15.23%	10.42%	12.48%
Median			0.74			12.48%
Mean			0.74			12.52%

Notes:
[1] Source: FRED, Federal Reserve Bank of St. Louis, 30-day average as of March 31, 2026
[2] Source: Bloomberg Professional, as of March 31, 2026
[3] Source: Exhibit JCN-3R, page 1
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- NEAR-TERM PROJECTED RISK-FREE RATE, BLOOMBERG BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - ALL COMPANIES
K = Rf + β (Rm − Rf)

Company	Ticker	[1] Near-term projected 30-year U.S. Treasury bond yield (Q3 2026 - Q3 2027)	[2] Beta (β)	[3] Market Return (Rm)	[4] Market Risk Premium (Rm − Rf)	[5] ROE (K)
Atmos Energy Corporation	ATO	4.80%	0.72	15.23%	10.43%	12.28%
New Jersey Resources Corporation	NJR	4.80%	0.75	15.23%	10.43%	12.63%
NiSource Inc.	NI	4.80%	0.77	15.23%	10.43%	12.79%
Northwest Natural Holding Co.	NWN	4.80%	0.67	15.23%	10.43%	11.82%
ONE Gas Inc.	OGS	4.80%	0.73	15.23%	10.43%	12.42%
Southwest Gas Holdings, Inc.	SWX	4.80%	0.81	15.23%	10.43%	13.22%
Spire, Inc.	SR	4.80%	0.74	15.23%	10.43%	12.48%
Median			0.74			12.48%
Mean			0.74			12.52%

Notes:
[1] Source: Blue Chip Financial Forecasts, Vol. 45, No. 4, April 1, 2026 at 2
[2] Source: Bloomberg Professional, as of March 31, 2026
[3] Source: Exhibit JCN-3R, page 1
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- LONG-TERM PROJECTED RISK-FREE RATE, BLOOMBERG BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - ALL COMPANIES
K = Rf + β (Rm − Rf)

Company	Ticker	[1] Projected 30-year U.S. Treasury bond yield (2027 - 2031)	[2] Beta (β)	[3] Market Return (Rm)	[4] Market Risk Premium (Rm − Rf)	[5] ROE (K)
Atmos Energy Corporation	ATO	4.60%	0.72	15.23%	10.63%	12.23%
New Jersey Resources Corporation	NJR	4.60%	0.75	15.23%	10.63%	12.58%
NiSource Inc.	NI	4.60%	0.77	15.23%	10.63%	12.74%
Northwest Natural Holding Co.	NWN	4.60%	0.67	15.23%	10.63%	11.75%
ONE Gas Inc.	OGS	4.60%	0.73	15.23%	10.63%	12.36%
Southwest Gas Holdings, Inc.	SWX	4.60%	0.81	15.23%	10.63%	13.18%
Spire, Inc.	SR	4.60%	0.74	15.23%	10.63%	12.42%
Median			0.74			12.42%
Mean			0.74			12.47%

Notes:
[1] Source: Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025 at 14
[2] Source: Bloomberg Professional, as of March 31, 2026
[3] Source: Exhibit JCN-3R, page 1
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- CURRENT RISK-FREE RATE, VALUE LINE BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - FERC METHODOLOGY
K = Rf + β (Rm − Rf)

		[1]	[2]	[3]	[4]	[5]
Company	Ticker	Current 30-day average of 30-year U.S. Treasury bond yield	Beta (β)	Market Return (Rm)	Market Risk Premium (Rm − Rf)	ROE (K)
Atmos Energy Corporation	ATO	4.80%	0.80	12.20%	7.39%	10.72%
New Jersey Resources Corporation	NJR	4.80%	0.75	12.20%	7.39%	10.35%
NiSource Inc.	NI	4.80%	0.85	12.20%	7.39%	11.09%
Northwest Natural Holding Co.	NWN	4.80%	0.80	12.20%	7.39%	10.72%
ONE Gas Inc.	OGS	4.80%	0.75	12.20%	7.39%	10.35%
Southwest Gas Holdings, Inc.	SWX	4.80%	0.80	12.20%	7.39%	10.72%
Spire, Inc.	SR	4.80%	0.75	12.20%	7.39%	10.35%
Median			0.80			10.72%
Mean			0.79			10.61%

Notes:
[1] Source: FRED, Federal Reserve Bank of St. Louis, 30-day average as of March 31, 2026
[2] Source: Value Line Reports
[3] Source: Exhibit JCN-3R, page 2
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- NEAR-TERM PROJECTED RISK-FREE RATE, VALUE LINE BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - FERC METHODOLOGY
K = Rf + β (Rm − Rf)

		[1]	[2]	[3]	[4]	[5]
Company	Ticker	Near-term projected 30-year U.S. Treasury bond yield (Q3 2026 - Q3 2027)	Beta (β)	Market Return (Rm)	Market Risk Premium (Rm − Rf)	ROE (K)
Atmos Energy Corporation	ATO	4.80%	0.80	12.20%	7.40%	10.72%
New Jersey Resources Corporation	NJR	4.80%	0.75	12.20%	7.40%	10.35%
NiSource Inc.	NI	4.80%	0.85	12.20%	7.40%	11.09%
Northwest Natural Holding Co.	NWN	4.80%	0.80	12.20%	7.40%	10.72%
ONE Gas Inc.	OGS	4.80%	0.75	12.20%	7.40%	10.35%
Southwest Gas Holdings, Inc.	SWX	4.80%	0.80	12.20%	7.40%	10.72%
Spire, Inc.	SR	4.80%	0.75	12.20%	7.40%	10.35%
Median			0.80			10.72%
Mean			0.79			10.61%

Notes:
[1] Source: Blue Chip Financial Forecasts, Vol. 45, No. 4, April 1, 2026 at 2
[2] Source: Value Line Reports
[3] Source: Exhibit JCN-3R, page 2
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- LONG-TERM PROJECTED RISK-FREE RATE, VALUE LINE BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - FERC METHODOLOGY
K = Rf + β (Rm − Rf)

		[1]	[2]	[3]	[4]	[5]
Company	Ticker	Projected 30-year U.S. Treasury bond yield (2027 - 2031)	Beta (β)	Market Return (Rm)	Market Risk Premium (Rm − Rf)	ROE (K)
Atmos Energy Corporation	ATO	4.60%	0.80	12.20%	7.60%	10.68%
New Jersey Resources Corporation	NJR	4.60%	0.75	12.20%	7.60%	10.30%
NiSource Inc.	NI	4.60%	0.85	12.20%	7.60%	11.06%
Northwest Natural Holding Co.	NWN	4.60%	0.80	12.20%	7.60%	10.68%
ONE Gas Inc.	OGS	4.60%	0.75	12.20%	7.60%	10.30%
Southwest Gas Holdings, Inc.	SWX	4.60%	0.80	12.20%	7.60%	10.68%
Spire, Inc.	SR	4.60%	0.75	12.20%	7.60%	10.30%
Median			0.80			10.68%
Mean			0.79			10.57%

Notes:
[1] Source: Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025 at 14
[2] Source: Value Line Reports
[3] Source: Exhibit JCN-3R, page 2
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- CURRENT RISK-FREE RATE, BLOOMBERG BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - FERC METHODOLOGY
K = Rf + β (Rm − Rf)

Company	Ticker	[1] Current 30-day average of 30-year U.S. Treasury bond yield	[2] Beta (β)	[3] Market Return (Rm)	[4] Market Risk Premium (Rm − Rf)	[5] ROE (K)
Atmos Energy Corporation	ATO	4.80%	0.72	12.20%	7.39%	10.11%
New Jersey Resources Corporation	NJR	4.80%	0.75	12.20%	7.39%	10.35%
NiSource Inc.	NI	4.80%	0.77	12.20%	7.39%	10.47%
Northwest Natural Holding Co.	NWN	4.80%	0.67	12.20%	7.39%	9.78%
ONE Gas Inc.	OGS	4.80%	0.73	12.20%	7.39%	10.20%
Southwest Gas Holdings, Inc.	SWX	4.80%	0.81	12.20%	7.39%	10.77%
Spire, Inc.	SR	4.80%	0.74	12.20%	7.39%	10.25%
Median			0.74			10.25%
Mean			0.74			10.28%

Notes:
[1] Source: FRED, Federal Reserve Bank of St. Louis, 30-day average as of March 31, 2026
[2] Source: Bloomberg Professional, as of March 31, 2026
[3] Source: Exhibit JCN-3R, page 2
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- NEAR-TERM PROJECTED RISK-FREE RATE, BLOOMBERG BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - FERC METHODOLOGY
K = Rf + β (Rm − Rf)

Company	Ticker	[1] Near-term projected 30-year U.S. Treasury bond yield (Q3 2026 - Q3 2027)	[2] Beta (β)	[3] Market Return (Rm)	[4] Market Risk Premium (Rm − Rf)	[5] ROE (K)
Atmos Energy Corporation	ATO	4.80%	0.72	12.20%	7.40%	10.11%
New Jersey Resources Corporation	NJR	4.80%	0.75	12.20%	7.40%	10.35%
NiSource Inc.	NI	4.80%	0.77	12.20%	7.40%	10.47%
Northwest Natural Holding Co.	NWN	4.80%	0.67	12.20%	7.40%	9.78%
ONE Gas Inc.	OGS	4.80%	0.73	12.20%	7.40%	10.20%
Southwest Gas Holdings, Inc.	SWX	4.80%	0.81	12.20%	7.40%	10.77%
Spire, Inc.	SR	4.80%	0.74	12.20%	7.40%	10.24%
Median			0.74			10.24%
Mean			0.74			10.27%

Notes:
[1] Source: Blue Chip Financial Forecasts, Vol. 45, No. 4, April 1, 2026 at 2
[2] Source: Bloomberg Professional, as of March 31, 2026
[3] Source: Exhibit JCN-3R, page 2
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

CAPITAL ASSET PRICING MODEL -- LONG-TERM PROJECTED RISK-FREE RATE, BLOOMBERG BETA, AND MARKET RISK PREMIUM DERIVED FROM S&P 500 - FERC METHODOLOGY
K = Rf + β (Rm − Rf)

Company	Ticker	[1] Projected 30-year U.S. Treasury bond yield (2027 - 2031)	[2] Beta (β)	[3] Market Return (Rm)	[4] Market Risk Premium (Rm − Rf)	[5] ROE (K)
Atmos Energy Corporation	ATO	4.60%	0.72	12.20%	7.60%	10.05%
New Jersey Resources Corporation	NJR	4.60%	0.75	12.20%	7.60%	10.30%
NiSource Inc.	NI	4.60%	0.77	12.20%	7.60%	10.42%
Northwest Natural Holding Co.	NWN	4.60%	0.67	12.20%	7.60%	9.71%
ONE Gas Inc.	OGS	4.60%	0.73	12.20%	7.60%	10.15%
Southwest Gas Holdings, Inc.	SWX	4.60%	0.81	12.20%	7.60%	10.73%
Spire, Inc.	SR	4.60%	0.74	12.20%	7.60%	10.19%
Median			0.74			10.19%
Mean			0.74			10.22%

Notes:
[1] Source: Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025 at 14
[2] Source: Bloomberg Professional, as of March 31, 2026
[3] Source: Exhibit JCN-3R, page 2
[4] Equals [3] - [1]
[5] Equals [1] + [2] x [4]

NATIONAL FUEL EXHIBIT JCN-5R

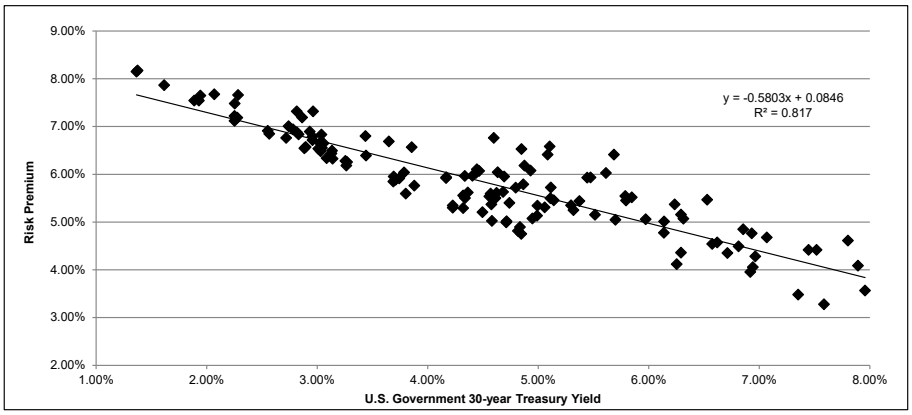
BOND YIELD PLUS RISK PREMIUM ANALYSIS
Risk Premium -- Natural Gas Utilities (US)

	[1] Average Authorized Gas ROE	[2] U.S. Govt. 30-year Treasury	[3] Risk Premium
1992.1	12.42%	7.80%	4.62%
1992.2	11.98%	7.89%	4.09%
1992.3	11.87%	7.45%	4.42%
1992.4	11.94%	7.52%	4.42%
1993.1	11.75%	7.07%	4.68%
1993.2	11.71%	6.86%	4.85%
1993.3	11.39%	6.31%	5.07%
1993.4	11.16%	6.14%	5.02%
1994.1	11.12%	6.57%	4.55%
1994.2	10.84%	7.35%	3.48%
1994.3	10.87%	7.58%	3.28%
1994.4	11.53%	7.96%	3.57%
1995.2	11.00%	6.94%	4.06%
1995.3	11.07%	6.71%	4.35%
1995.4	11.61%	6.23%	5.37%
1996.1	11.45%	6.29%	5.16%
1996.2	10.88%	6.92%	3.96%
1996.3	11.25%	6.96%	4.29%
1996.4	11.19%	6.62%	4.58%
1997.1	11.31%	6.81%	4.49%
1997.2	11.70%	6.93%	4.77%
1997.3	12.00%	6.53%	5.47%
1997.4	10.92%	6.14%	4.78%
1998.2	11.37%	5.85%	5.52%
1998.3	11.41%	5.47%	5.94%
1998.4	11.69%	5.10%	6.59%
1999.1	10.82%	5.37%	5.44%
1999.2	11.25%	5.79%	5.46%
1999.4	10.38%	6.25%	4.12%
2000.1	10.66%	6.29%	4.36%
2000.2	11.03%	5.97%	5.06%
2000.3	11.33%	5.79%	5.55%
2000.4	12.10%	5.69%	6.41%
2001.1	11.38%	5.44%	5.93%
2001.2	10.75%	5.70%	5.05%
2001.4	10.65%	5.30%	5.35%
2002.1	10.67%	5.51%	5.15%
2002.2	11.64%	5.61%	6.03%
2002.3	11.50%	5.08%	6.42%
2002.4	11.01%	4.93%	6.08%
2003.1	11.38%	4.85%	6.53%
2003.2	11.36%	4.60%	6.76%
2003.3	10.61%	5.11%	5.50%
2003.4	10.84%	5.11%	5.73%
2004.1	11.06%	4.88%	6.18%
2004.2	10.57%	5.32%	5.25%
2004.3	10.37%	5.06%	5.31%
2004.4	10.66%	4.86%	5.79%
2005.1	10.65%	4.69%	5.96%
2005.2	10.54%	4.47%	6.07%
2005.3	10.47%	4.44%	6.03%
2005.4	10.32%	4.68%	5.63%
2006.1	10.68%	4.63%	6.05%
2006.2	10.60%	5.14%	5.46%
2006.3	10.34%	4.99%	5.34%
2006.4	10.14%	4.74%	5.40%
2007.1	10.52%	4.80%	5.72%
2007.2	10.13%	4.99%	5.14%
2007.3	10.03%	4.95%	5.08%
2007.4	10.12%	4.61%	5.50%
2008.1	10.38%	4.41%	5.97%
2008.2	10.17%	4.57%	5.60%
2008.3	10.55%	4.44%	6.11%
2008.4	10.34%	3.65%	6.69%
2009.1	10.24%	3.44%	6.81%
2009.2	10.11%	4.17%	5.94%
2009.3	9.88%	4.32%	5.56%
2009.4	10.31%	4.34%	5.97%
2010.1	10.24%	4.62%	5.61%
2010.2	9.99%	4.36%	5.62%
2010.3	10.43%	3.86%	6.57%
2010.4	10.09%	4.17%	5.93%
2011.1	10.10%	4.56%	5.54%
2011.2	9.85%	4.34%	5.51%
2011.3	9.65%	3.69%	5.96%
2011.4	9.88%	3.04%	6.84%
2012.1	9.63%	3.14%	6.50%
2012.2	9.83%	2.93%	6.90%
2012.3	9.75%	2.74%	7.01%
2012.4	10.06%	2.86%	7.19%
2013.1	9.57%	3.13%	6.44%
2013.2	9.47%	3.14%	6.33%
2013.3	9.60%	3.71%	5.89%
2013.4	9.83%	3.79%	6.04%
2014.1	9.54%	3.69%	5.85%
2014.2	9.84%	3.44%	6.39%
2014.3	9.45%	3.26%	6.19%

BOND YIELD PLUS RISK PREMIUM ANALYSIS
Risk Premium -- Natural Gas Utilities (US)

	[1]	[2]	[3]
	Average Authorized Gas ROE	U.S. Govt. 30-year Treasury	Risk Premium
2014.4	10.28%	2.96%	7.32%
2015.1	9.47%	2.55%	6.91%
2015.2	9.43%	2.88%	6.55%
2015.3	9.75%	2.96%	6.79%
2015.4	9.68%	2.96%	6.72%
2016.1	9.48%	2.72%	6.76%
2016.2	9.42%	2.57%	6.85%
2016.3	9.47%	2.28%	7.19%
2016.4	9.67%	2.83%	6.84%
2017.1	9.60%	3.04%	6.56%
2017.2	9.47%	2.90%	6.58%
2017.3	10.14%	2.82%	7.32%
2017.4	9.70%	2.82%	6.88%
2018.1	9.68%	3.02%	6.66%
2018.2	9.43%	3.09%	6.34%
2018.3	9.71%	3.06%	6.65%
2018.4	9.53%	3.27%	6.26%
2019.1	9.55%	3.01%	6.54%
2019.2	9.73%	2.78%	6.94%
2019.3	9.95%	2.29%	7.66%
2019.4	9.74%	2.25%	7.48%
2020.1	9.43%	1.89%	7.55%
2020.2	9.55%	1.38%	8.17%
2020.3	9.52%	1.37%	8.15%
2020.4	9.49%	1.62%	7.87%
2021.1	9.75%	2.07%	7.68%
2021.2	9.48%	2.25%	7.22%
2021.3	9.48%	1.93%	7.54%
2021.4	9.59%	1.94%	7.65%
2022.1	9.38%	2.25%	7.12%
2022.2	9.52%	3.03%	6.48%
2022.3	9.54%	3.26%	6.28%
2022.4	9.65%	3.88%	5.77%
2023.1	9.66%	3.74%	5.92%
2023.2	9.40%	3.80%	5.60%
2023.3	9.53%	4.23%	5.30%
2023.4	9.61%	4.58%	5.03%
2024.1	9.62%	4.32%	5.29%
2024.2	9.95%	4.58%	5.37%
2024.3	9.58%	4.23%	5.35%
2024.4	9.70%	4.50%	5.21%
2025.1	9.73%	4.71%	5.02%
2025.2	9.73%	4.83%	4.90%
2025.3	9.60%	4.85%	4.75%
2025.4	9.71%	4.71%	5.00%
2026.1	9.63%	4.82%	4.82%
AVERAGE	10.34%	4.49%	5.85%
MEDIAN	10.14%	4.57%	5.89%

BOND YIELD PLUS RISK PREMIUM ANALYSIS
Risk Premium -- Natural Gas Utilities (US)



SUMMARY OUTPUT

Regression Statistics	
Multiple R	0.903877774
R Square	0.816995029
Adjusted R Square	0.815598045
Standard Error	0.004324306
Observations	133

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	0.010936054	0.010936054	584.8275518	3.77534E-50
Residual	131	0.00244965	1.86996E-05		
Total	132	0.013385705			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*
Intercept	0.084560324	0.001141014	74.10980583	8.0268E-109	0.082303126	0.08681752
U.S. Govt. 30-year Treasury	-0.580286434	0.023995428	-24.18320805	3.77534E-50	-0.627755115	-0.5328178

	[7] U.S. Govt. 30-year Treasury	[8] Risk Premium	[9] ROE
Current 30-day average of 30-year U.S. Treasury bond yield [4]	4.80%	5.67%	10.47%
Blue Chip Near-Term Projected Forecast (Q1 2026 - Q1 2027) [5]	4.80%	5.67%	10.47%
Blue Chip Long-Term Projected Forecast (2027-2031) [6]	4.60%	5.79%	10.39%
AVERAGE			10.44%

Notes:
[1] Source: Regulatory Research Associates, rate cases through March 31, 2026
[2] Source: Bloomberg Professional, quarterly bond yields are the average of each trading day in the quarter
[3] Equals Column [1] − Column [2]
[4] Source: Federal Reserve Bank of St. Louis (FRED), 30-day average as of March 31, 2026
[5] Source: Blue Chip Financial Forecasts, Vol. 45, No. 4, April 1, 2026 at 2
[6] Source: Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025 at 14
[7] See notes [4], [5] & [6]
[8] Equals 0.084560 + (-0.580286 x Column [7])
[9] Equals Column [7] + Column [8]

NATIONAL FUEL EXHIBIT JCN-6R

Source: I&E Exhibit No. 2

Mr. Breuning's Corrected CAPM Analysis

Schedule 17	**As filed**	**As Adjusted - FERC Method**	**As Adjusted - All S&P 500**
Value Line Projected Market Return	10.78%	12.20%	15.23%
S&P 500 Historical Return	12.35%	12.35%	12.35%
Average Expected Market Return	11.57%	12.28%	13.79%
Schedule 18			
Risk-free rate	4.20%	4.60%	4.60%
Expected Market Return	11.57%	12.28%	13.79%
Beta	0.78	0.78	0.78
CAPM Estimate	**9.94%**	**10.59%**	**11.77%**

NATIONAL FUEL EXHIBIT JCN-7R

Mr. Breuning's Adjusted DCF Analysis

Company	Ticker	[1] Dividend	[2] 52-Week Low Stock Price	[3] 52-Week High Stock Price	[4] Spot Price	[5] Spot Dividend Yield	[6] 52-Week Dividend Yield	[7] Adjusted Dividend Yield	[8] Value Line Earnings Growth	[9] S&P Cap. IQ Earnings Growth	[10] Zacks Earnings Growth	[11] Average Growth Rate	[12] Expected ROE
Atmos Energy Corporation	ATO	$4.24	$141.59	$182.69	$181.72	2.33%	2.62%	2.47%	8.00%	8.36%	7.00%	7.79%	10.26%
Chesapeake Utilities Corp.	CPK	$2.98	$115.24	$140.59	$135.06	2.21%	2.33%	2.27%	8.00%	8.15%	n/a	8.08%	10.34%
New Jersey Resources Corporation	NJR	$2.10	$43.46	$54.70	$53.39	3.93%	4.28%	4.11%	5.00%	8.55%	n/a	6.78%	10.88%
NiSource Inc.	NI	$1.28	$35.64	$47.05	$46.47	2.75%	3.10%	2.93%	7.50%	8.64%	n/a	8.07%	11.00%
Northwest Natural Holding Company	NWN	$1.97	$38.94	$50.94	$49.89	3.95%	4.38%	4.17%	6.00%	5.50%	n/a	5.75%	9.92%
ONE Gas, Inc.	OGS	$2.76	$69.75	$86.79	$85.34	3.23%	3.53%	3.38%	6.00%	7.10%	8.10%	7.07%	10.45%
Southwest Gas Holdings, Inc. [13]	SWX	$2.48	$66.91	$88.24	$87.07	2.85%	3.20%	3.02%	n/a	12.70%	9.20%	10.95%	13.97%
Spire, Inc. [14]	SR	$3.46	$71.03	$91.84	$90.76	3.81%	4.25%	4.03%	8.50%	7.20%	12.00%	9.23%	13.26%
Median (Excluding SWX and SR)							3.31%	3.15%	6.75%	8.26%	7.55%	7.43%	10.39%
Mean (Excluding SWX and SR)							3.37%	3.22%	6.75%	7.72%	7.55%	7.25%	**10.47%**
Median (Including SWX and SR)							3.36%	3.20%	7.50%	8.26%	8.65%	7.93%	10.66%
Mean (Including SWX and SR)							3.46%	3.30%	7.00%	8.28%	9.08%	7.96%	**11.26%**
Minimum ROE													9.92%
Maximum ROE													13.97%

Notes:
[1] - [12] Source: I&E Exhibit No. 2, Schedule 11, 12, and 13
[13] - [14] Source: Stock Price Data Sourced from S&P Capital IQ as of Feb 25, 2026, and Dividend Data Sourced from Value Line, and Growth Rates Sourced from Value Line, S&P Capital IQ, and Zacks

NATIONAL FUEL STATEMENT NO. 11

JAMES C. WELCH

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 11

Direct Testimony of James C. Welch

Topics Addressed: Financial Data, Capital Structure and Cost of Debt

Dated: January 28, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is James C. Welch. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. By whom and in what capacity are you employed?

A. I am employed by National Fuel Gas Distribution Corporation ("NFGDC") as Treasurer and Vice President of Finance.

Q. Please provide your educational background.

A. I graduated from the State University of New York at Buffalo in 2000 with a Bachelor of Science degree in Physical Therapy and in 2002 with a Master of Business Administration ("MBA") degree with concentrations in Finance and Marketing.

Q. Please provide your professional experience.

A. In June 2002 I began my employment with NFGDC in the MBA Associate rotational program. I joined the Rates & Regulatory Affairs department in April 2004, as a Rate Analyst II. From 2006 to 2025, I worked for a number of subsidiaries within National Fuel Gas Company ("NFG") in various financial, commercial and operational roles with increasing levels of responsibility. As of April 2025, I transferred to my current role.

Q. Have you previously testified in other proceedings before the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission") or any other state or federal agency?

A. Yes, I testified before the PAPUC on behalf of NFGDC's Pennsylvania Division ("National Fuel" or the "Company") in Docket No. R-00049656.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your testimony.

A. My testimony supports the financial information that was provided to Company witness Josh Nowak for preparation of his testimony (National Fuel Statement No. 10) concerning the fair rate of return and recommended capital structure for NFGDC. My testimony also supports the cost of debt used by Mr. Nowak.

Q. Are you sponsoring any exhibits or filing requirements in this proceeding?

A. I am sponsoring the following the filing requirements 53.53 III-D-9, 53.53 III-E.1 through E.17, E-21 through E-36, 53.53 III-G-1, G-6 and G-7. I am also sponsoring standard data requests, ROR-1 through ROR-13, ROR-15 through ROR-20, ROR-22 through ROR-23.

III. CORPORATE STRUCTURE

Q. Please provide an overview of National Fuel Gas Company and its subsidiaries.

A. National Fuel Gas Company ("NFG" or "Parent") is a holding company that owns directly or indirectly all the outstanding securities of its subsidiaries. Across its three

major business segments, NFG operates an integrated natural gas company in New York and Pennsylvania that spans the natural gas value chain from wellhead to burner tip. The common geographic footprint of NFG's subsidiaries enables it to share management, labor, facilities and support services to cost-effectively develop, gather, transport and store, and ultimately distribute natural gas to end-users.

Q. How do NFG and its subsidiaries raise capital?

A. NFG raises long-term debt, short-term debt, and common equity from external sources and provides capital to its subsidiaries through intercompany debt agreements and capital contributions.

Q. Does NFGDC raise capital from external sources?

A. No, NFG provides all short-term and long-term debt, as well as common equity.

Q. Does the PAPUC approve NFGDC's short-term and long-term financing strategy?

A. Yes, the PAPUC grants the authority for NFGDC to issue promissory notes to NFG, most recently in 2023 (Docket No. S-2023-3041669). The PAPUC also approved NFG's Money Pool Agreement – to which NFGDC is a party – most recently in 2018 (Docket No. G-2009-2092081).

IV. CAPITAL STRUCTURE

Q. How does NFGDC determine an appropriate capital structure?

A. Over the long term, NFGDC targets a capital structure that optimizes debt and equity relative to the risk of operations and is within the range of capital structures used by other similar utilities.

Q. Is it appropriate to use NFGDC's capital structure for purposes of this proceeding?

A. Yes. NFGDC's capital structure represents the optimal mix of debt and equity given its specific utility risk profile. I further note that NFGDC's common equity ratio is within the range of the proxy group identified by Company witness Josh Nowak.

Q. Mr. Josh Nowak has presented direct testimony (Statement No. 10) concerning the fair rate of return and capital structure in this proceeding. In preparation of that testimony Mr. Nowak relied, to a certain degree, on financial information provided to him by the Company. Was the financial information provided to him by the Company prepared by you or under your supervision?

A. Yes, the information provided to Mr. Nowak for preparation of his testimony was prepared under my supervision.

Q. What is the proposed capital structure for this filing?

A. As stated in Mr. Nowak's testimony, the proposed capital structure consists of 56.4% common equity and 43.6% long-term debt.

Q. How was the proposed capital structure determined?

A. The proposed capital structure reflects NFGDC's long-term debt and common equity, as currently projected at the end of the fully projected future test year ending October 31, 2027 ("FPFTY"). As Mr. Nowak provides in his testimony, the common equity percentage is consistent with other precedent rate filings.

Q. Prior to the HTY, was there any material changes to NFGDC's capital structure?

A. No, NFGDC's capital structure has remained relatively consistent over the past several years. As NFGDC's debt has increased, infusions of common equity commensurate with that increase has occurred, and would be considered in the future. As an example, in August 2025, NFGDC received an equity infusion of $50 million from NFG, which brought the equity component of the capital structure up to 56.1%. NFGDC's capital structure is included in table III-E.1 for reference.

V. SHORT-TERM DEBT

Q. Please describe National Fuel's and NFGDC's available sources of short-term borrowings.

A. NFG has established both uncommitted and committed lines of credit that are available to its subsidiaries, including NFGDC, via its Money Pool Agreement. These facilities have been established for general corporate purposes and are used as needed, on a temporary basis. NFG currently has arrangements to borrow up to $1.0 billion from committed credit facilities, that consists of an unsecured revolving credit facility with a February 2029 maturity date. This level of short-term liquidity is adequate to meet the needs of all of NFG's subsidiaries. In addition, the $1 billion credit facility backstops a $500 million

commercial paper program, which alongside its investment grade credit rating, provides NFG access to the commercial paper market. Commercial paper typically represents a more cost-effective borrowing option to meet fluctuating interim capital needs when compared to the credit facility. The Parent's uncommitted and committed lines of credit provide adequate liquidity to cost effectively manage the cash needs of NFG and NFGDC in all market conditions.

Q. How does NFGDC typically utilize short-term debt financing?

A. NFGDC uses short-term debt for two purposes. First, to support its working capital needs, which are driven primarily by purchases of gas for customers. Second, to finance its capital spending program in the near-term. Over time, as NFGDC builds up a large enough balance of short-term debt that is used to fund its capital program, it looks to term out that more permanent investment with a long-term debt issuance and/or common equity such that the permanent financing mix is generally in line with its target long-term capital structure.

Q. What was NFGDC's average short-term debt balance during the HTY?

A. NFGDC's short-term debt averaged $180 million during the twelve months ended September 30, 2025.

Q. What is the expected short-term debt average balance during the FTY and what is driving the change from the HTY?

A. The average short-term debt balance during the FTY is expected to be $191 million. Although the majority of NFGDC's capital program is funded out of cash flows generated by NFGDC, there continues to be a need to use short term debt funded via the Money Pool as a near-term funding mechanism to finance these investments.

Q. What short-term debt balance will be outstanding at the end of the FPFTY?

A. NFGDC expects to have $47 million of short-term debt outstanding at the end of the FPFTY. Given the continued short-term borrowings during the HTY and the FTY, NFGDC expects to permanently finance the portion of its short-term debt related to capital investments using a combination of long-term debt and equity contributions. Short term debt balances is being used to finance Construction Work in Progress. Construction Work in Progress is not included in rate base so the short term debt balance at the end of the FPFTY has been excluded from NFGDC's capital structure.

Q. Given that there is no short-term debt included in the proposed capital structure, how are the costs associated with maintaining adequate access to short-term liquidity sources accounted for?

A. To account for the costs of maintaining sufficient liquidity, all upfront and ongoing expenses are incorporated into the cost of long-term debt, which is further discussed in the next section.

VI. LONG-TERM DEBT

Q. What cost rate for long-term debt is most appropriate for use in your cost of capital determination?

A. Given the utilization of NFGDC's capital structure, it is appropriate to use the cost of debt that represents the debt allocated to NFGDC. Using this methodology, the proposed long-term debt cost rate at the end of the FPFTY is 5.58% as shown on page 4 of the Company's response to 53.53.III-E-6.

Q. How is long-term debt allocated to NFGDC?

A. NFG allocates new debt issuances down to one or more of its subsidiaries based on anticipated needs at the time of the new issuance and to ensure capital structures for each of its subsidiaries align with the risk profiles of those businesses over the long term. For issuances that NFG allocates funds to NFGDC, NFGDC in turn issues a promissory note, as approved by the Commission, to NFG that is tied to a specific debt issuance at NFG.

Q. For purposes of the intercompany promissory notes, how is the cost of long-term debt determined?

A. The cost of debt reflects the coupon on that issuance, any premium or discount to par, and any costs related to issuing new securities (e.g. Securities and Exchange Commission registration costs, underwriting expenses, legal costs, rating agency fees, etc.). This is all reflected in an interest rate such that NFG is made whole over the life of the issuance.

Q. Are there any additional costs that are included in the cost rate for long-term debt?

A. Yes, there are costs associated with maintaining access to liquidity, via the previously discussed short-term liquidity facilities, that need to be recovered. Given that there is no short-term debt proposed in the capital structure at the end of the FPFTY, but there are ongoing costs allocated to NFGDC to maintain access to these liquidity facilities, it is necessary to recover these costs. As a result, the Company proposes recovering these costs through the cost of long-term debt, which is embedded in the 5.58% stated above. Included in these costs are amortized upfront transaction costs, and ongoing annual expenses related to NFGDC's share of the committed credit facility. Those are just and reasonable costs to maintain an adequate amount of liquidity to preserve financial strength. This methodology is consistent with how the Company recovered these costs in its last base rate proceeding.

Q. Are there any new issuances anticipated between now and the end of the FPFTY?

A. Yes. NFG anticipates issuing a new $500 million 10-year note in October 2026 and a new $300 million 10-year note in September 2027. NFGDC will be allocated $125 million and $275 million of the new issuances, respectively. The proceeds are intended to pay down existing long-term debt borrowings and short-term debt on the balance sheet.

Q. How much long-term debt can NFGDC issue under its currently approved financing authority (Docket No. S-2023-3041669)?

A. NFGDC was granted the ability to issue up to $300 million of new promissory notes under its existing authority. It issued a $175 million promissory note in February 2025 and has $125 million remaining through December 31, 2026. This remaining authority

aligns with the expected proceeds it will receive from a new issuance October 2026. The additional $275 million promissory note to be issued by NFGDC in September 2027 occurs beyond the current authorization. The Company will seek authorization from the Commission prior to issuance.

Q. How has the cost rate of the projected new issuance been determined?

A. I am assuming NFG issues new 10-year notes. This was done to prevent the potential of carrying a higher than historical coupon for longer term debt for an extended period of time. The coupon rate of 5.50% is based upon an average of the recent historical yields published in the November 2025 issue of the Mergent Bond Record, representing the average Moody's Public Utility Baa credit rating, adjusted for a 10-year tenor. The effective cost rate includes projected transaction related costs similar to precedent NFG long-term debt issuances.

Q. Does this conclude your direct testimony at this time?

A. Yes.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 11-R

Rebuttal Testimony of James C. Welch

Topics Addressed: Capital Structure

Dated: May 12, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is James C. Welch. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. Did you previously submit testimony in this proceeding on behalf of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company")?

A. Yes. I submitted my direct testimony, National Fuel Statement No. 11, on January 28, 2026.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your rebuttal testimony.

A. The purpose of my rebuttal testimony is to respond to direct testimony provided by Witness Mr. Drew Breuning, Investigation & Enforcement ("I&E") and by OCA Witness Maureen L. Reno.

Q. Are you sponsoring any exhibits with your rebuttal testimony?

A. No, not at this time.

III. CAPITAL STRUCTURE

Q. Please provide the capital structure proposed by I&E Witness Breuning.

A. I&E Witness Brening is proposing a capital structure of 55% common equity and 45% long term debt.

Q. Please describe the modifications and reasoning for the capital structure proposed by Witness Breuning in his testimony, and other relevant commentary to be rebutted.

A. Witness Breuning proposes (1) the use of a hypothetical capital structure based on a proxy group, and (2) changes to the proposed proxy group provided by the Company.

Q. Please provide the capital structure proposed by OCA Witness Reno.

A. Witness Reno is proposing a hypothetical capital structure of 50% common equity and 50% long term debt.

Q. Do you agree with the use of a hypothetical capital structure as proposed by I&E Witness Breuning and OCA Witness Roth?

A. No. The Commission has consistently held that if a utility's actual capital structure is within the range of a similarly situated proxy group of companies, then rates should be set based on the utility's actual capital structure. As the Commission has determined: "Absent a finding by the Commission that a utility's actual capital structure is atypical or too heavily weighed on either the debt or equity side, we would not normally exercise our discretion with regard to implementing a hypothetical capital structure." *Pa. PUC, et al. v. Columbia Gas of Pa., Inc.*, Docket Nos. R-2020-3018835, *et al.* (Order entered Feb. 19, 2021),at 116-17 (quoting *Pa. PUC. v. PPL Electric Utilities Corp.*, Docket Nos. R-2012-2290597, *et al*. (Order entered Dec. 28, 2012) ("*2012 PPL Order*") at 68); *see also Pa. PUC, et al. v. PECO Energy Co. – Gas Division*, Docket Nos. R-2020-3018929, *et al.* (Order entered June 22, 2021), at 144-45 (also quoting *2012 PPL*

Order at 68). The Commission recently confirmed this approach in its Order entered in Columbia Gas of Pennsylvania, Inc.'s ("Columbia Gas") 2025 rate case, stating:

> We find it appropriate to reinforce our finding, which we have outlined in several recent base rate proceedings before this Commission, that the use of an actual capital structure represents the Company's decision, in which it has full discretion, on how to capitalize its rate base. This actual capitalization forms the basis upon which the Company attracts capital.

Pa. PUC, et al. v. Columbia Gas, Docket Nos. R-2025-3053499 (Order entered Dec. 9, 2025), at 210-211 (internal quotations omitted).

Q. Does the current the capital structure proposed by the Company and by I&E meet this standard, and fall within the range of a reasonable peer proxy group?

A. Yes. The capital structure proposed by the Company falls within the range of acceptable capital structures for peer proxy groups, whether using the proxy group constructed by National Fuel witness Nowak in direct testimony, or the proxy group identified by I&E witness Breuning in direct testimony.

Q. In previous cases filed by the Company and presided over by the Pennsylvania Public Utility Commission, has I&E recommended the use of the actual capital structure provided by the Company or similarly situated utilities?

A. Yes. In Docket No. R-2022-3035730, the Company's most recent rate case, I&E supported the use of the Company's claimed capital structure. The I&E witness in that case noted in Statement No. 3, page 12, lines 13-15, "I recommend using the Company's claimed capital structure as it falls within the range of my proxy group's 2021 (most recent available) capital structure."

Q. Do you agree with the changes to the proxy group proposed by Witness Breuning?

A. No. National Fuel witness Nowak responds to the proposed modifications to the proxy group on pages 33 through 37 of his rebuttal testimony (National Fuel St. No. 10-R).

Q. Does the Company use double leverage as alleged by OCA Witness Reno?

A. No, the Company does not use double leverage. At no point has National Fuel's parent company, National Fuel Gas Company ("NFG"), issued debt and infused it as equity to the Company.

Q. Why does OCA Witness Reno introduce the concept of double-leverage in this proceeding?

A. It is unclear why this point is raised, and its introduction into the record is not relevant or instructive in this case given the fact that the Company has not utilized double leverage at any point.

Q. Is the practice of NFG issuing debt, and linking any debt issuance to a National Fuel promissory note consistent with prior practice and review, and approved by the Commission?

A. National Fuel relies on NFG as a source of capital through its public offerings of debt securities. This approach is governed and accepted by the Commission through the Credit and Security Agreement between the parties, which the Commission has noted,

"appears to be reasonable and consistent with the public interest under Section 2102(b) of the Public Utility Code."

Q. Do you agree with OCA witness Reno's reference to National Fuel's historic test year ("HTY") capital structure as an argument to determine a hypothetical capital structure for the forward-looking business, and the comparison to NFG capital structure?

A. No. To remain consistent with the collective rate proceeding, including the company revenue requirement calculations, the projected capital structure at the end of the fully projected future test year ("FPFTY") should be used. Further, comparing NFG's HTY equity ratio at January 31, 2025, to the Company's equity ratio at October 31, 2027, the end of the FPFTY, is illogical and lacks any basis for consideration.

Q. Do you agree with the argument that National Fuel's equity ratio exceeds that of NFG and should support the use of a hypothetical capital structure?

A. No. As provided in the initial filing requirement response III-E.31, NFG has a projected equity ratio of 62.5% at the FPFTY, far greater than the Company's projected equity ratio of 56.4% proposed in this proceeding.

Q. Do I&E witness Breuning and OCA witness Reno discuss the appropriate long-term debt cost rate for the FPFTY as part of this case?

A. Yes.

Q. Do I&E witness Breuning and OCA witness Reno agree with the Company's long-term debt cost rate for the FTFPY?

A. The parties agree that the long-term debt cost rate of 5.58% proposed by National Fuel for the FPFTY is appropriate and reasonable.

Q. Does this conclude your rebuttal testimony at this time?

A. Yes.

NATIONAL FUEL STATEMENT NO. 12

ERICA L. FORCUCCI

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 12

Direct Testimony of
Erica L. Forcucci

Topics Addressed: Income Taxes

Dated: January 28, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Erica L. Forcucci. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. By whom and in what capacity are you employed?

A. I am employed by National Fuel Gas Distribution Corporation ("NFGDC") as Managing Director, Tax department.

Q. Please provide your educational background.

A. I graduated from the State University of New York at Oswego in 1999 with a Bachelor of Science degree in Accounting, with a minor in Economics. In 2000, I graduated from the State University of New York at Oswego with a Master of Business Administration degree. I was certified by New York State as a Public Accountant in 2002.

Q. Please provide your professional experience.

A. From 2000-2007, I worked for the public accounting firms KPMG, LLP and Ernst & Young, LLP and from 2008-2009, I worked for Sanderson and Company, LLC and Mark IV Industries. In 2010, I became Corporate Tax Manager at Cobham Management Services Inc. and was promoted in 2016 to Director of Tax at Cobham Management Services Inc., transferring in the same position to Cobham Advanced Electronic Solutions, Inc. in 2020. In 2023, I was hired by NFGDC as Managing Director of the Tax department.

Q. Have you previously testified in other proceedings before the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission") or any other state or federal agency?

A. No.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your testimony.

A. I am presenting testimony in support of NFGDC's Pennsylvania Division's ("National Fuel" or the "Company") federal and state income tax claims. I will explain the tax adjustments made to the results of the historic test year ended September 30, 2025 ("HTY") and future test year ending September 30, 2026 ("FTY"). I will also explain the Company's *pro forma* tax adjustments to its principal accounting exhibits for the fully projected future test year ending October 31, 2027 ("FPFTY").

Q. Are you sponsoring any exhibits or filing requirements in this proceeding?

A. Yes. I am sponsoring National Fuel Exhibits EF-1, EF-2, and EF-3. Together with other Company witnesses, I am sponsoring portions of Exhibit A (Fully Projected), Exhibit A (Future) and Exhibit A (Historic) that pertain to tax-related issues. I am also sponsoring certain responses to the Commission's filing requirements and standard data requests.

III. TAX ADJUSTMENTS

Q. Please provide an overview of National Fuel's principal accounting exhibits relative to its proposed tax adjustments.

A. As explained in the Direct Testimony of Donald N. Koch (National Fuel Statement No. 2), National Fuel's principal accounting exhibit is Exhibit A (Fully Projected), which includes a presentation for the FPFTY ending October 31, 2027. Section D of this exhibit presents necessary adjustments to budgeted levels of expense items and revenues. The *pro forma* adjustments related to income taxes are summarized in Schedules D-11 and D-12. These adjustments are used to derive National Fuel's *pro forma* income at present and proposed rates as set forth in Schedule A-1 of the same exhibit.

Exhibit A (Historic) and Exhibit A (Future) follow the same format but reflect data for the HTY ended September 30, 2025 and FTY ending September 30, 2026, respectively. This information is provided to comply with the Commission's filing requirements and provides a basis for comparing National Fuel's FPFTY claims with actual book results from the HTY and adjusted FTY results.

IV. TAXES OTHER THAN INCOME TAXES

Q. How was the provision for taxes-other-than-income taxes ("TOTI") determined for the FPFTY?

A. TOTI consists of the Pennsylvania Utility Realty Tax, Pennsylvania and Local Property taxes, Social Security taxes, Federal Unemployment tax, and State Unemployment tax. TOTI amounts were based on the plan year budget, as adjusted for reasonably known and measurable changes to various payroll taxes as supported by the Direct Testimony of Donald N. Koch (National Fuel Statement No. 2). These adjustments are shown on Exhibit A (Fully Projected), Schedule D-10. The net adjustment is brought forward to Schedule D-3, page 2.

V. INCOME TAXES

Q. Please describe the Company's claim for income taxes.

A. Income tax expense for the FPFTY at present and proposed rates is set forth in Exhibit A (Fully Projected), Schedule D-11. Income taxes are calculated using the procedures normally followed by the Commission, including the use of debt interest synchronization, the normalization method for accelerated depreciation used in the calculation of federal income taxes, and the flow-through of accelerated depreciation benefits for state tax purposes. The Company continues to flow through the annual repairs tax deduction for federal and state tax purposes. The fully adjusted claim for the FPFTY income tax expense is shown on Exhibit A (Fully Projected), Schedule D-1, Lines 19 and 20.

Q. Please explain how the Company's claim for current income tax was calculated.

A. Schedule D-11 shows the calculation of *pro forma* income taxes for the FPFTY at present and proposed rates. Line 1 shows revenue at present and proposed rates, while Line 2 shows operating expenses at present and proposed rates from Schedule D-1. Line 3 reflects operating income before debt interest deduction and is calculated by netting Line 1 from Line 2. Debt interest expense is synchronized using the rate base claim from Schedule C-1, with the cost of debt and the debt component of the Company's capital structure recommended in the direct testimony of Josh Nowak (National Fuel Statement No. 10) and shown on Schedule B-7. The resulting interest expense on Line 6 is subtracted from net income before debt interest to calculate base taxable income on Line 7.

In accordance with established Commission practice, Lines 8 through 10 of Schedule D-11 reduce the base taxable income, for state tax purposes, by the total difference between accelerated tax depreciation shown on Line 8 and the *pro forma* book depreciation shown on Line 9. Line 11 includes a further reduction to state taxable income from other state income tax adjustments as detailed on National Fuel Exhibit EF-2, which is explained below. The statutory state corporate net income tax rate (7.49%, in FPFTY further explained below) was then applied to determine the *pro forma* state income tax expense shown on Line 13. Lines 14 through 19 show the federal current income tax expense calculation at current and proposed rates, while Line 20 sums the state and federal current tax expense amounts before application of deferred income taxes.

Q. Please explain how the Company's claim for deferred income taxes was calculated.

A. Total federal temporary differences are shown on Line 25 of Schedule D-11. These include differences between accelerated tax depreciation and book depreciation adjusted for book flow through depreciation, shown on Line 22, as well as other deferred adjustments on Line 24, which are detailed on National Fuel Exhibit EF-2 and explained below. The statutory federal corporate income tax rate (21%) is applied to the total federal temporary differences to determine the deferred federal income tax benefit on Line 27. As state tax consequences are flowed through, there are no state deferred income taxes, except for the 2009 repairs and maintenance Section 481(a) amortization as agreed upon in Docket No. R-2022-3035730 ("2022 Rate Case") on Line 28.

Other tax adjustments are shown on Lines 31 through 34. These include amortizations for the federal benefit of 2009 repairs and maintenance Section 481(a)

amortization, Average Rate Assumption Method ("ARAM") and unprotected deficient income taxes. These adjustments are explained in testimony below.

Q. Please explain what is represented on National Fuel Exhibit EF-2 Other Income Tax Adjustments.

A. National Fuel Exhibit EF-2 details other income tax adjustments which flow into both the current and deferred income tax calculations on Schedule D-11. Other state and federal adjustments to current income tax expense total $36.1 million as shown on Lines 5 and 10, respectively, of Exhibit EF-2. These adjustments include the permanent differences resulting from the current year repair and maintenance deduction, the non-deductible portion of meals and entertainment, and other temporary differences resulting from contributions in aid of construction ("CIAC") and uniform capitalization ("UNICAP") rules per Internal Revenue Code ("IRC") Section 263A. Other adjustments to the federal deferred calculation represent the deferred impact of the temporary differences for CIAC and UNICAP.

Q. How does the Company plan to account for the deferred tax asset and related regulatory liability established for the Medicare subsidy?

A. The Medicare Prescription Drug Improvement and Modernization Act of 2003 established a tax-free subsidy for a portion of an employer's annual prescription drug costs. The Patient Protection and Affordable Care Act of 2010 eliminated the "tax-free" nature of these subsidies for tax years beginning after December 31, 2012. During this period, the Company received the tax benefit of the tax-free subsidies and recorded a

deferred tax asset and regulatory liability to preserve this benefit for the ratepayers, as detailed on National Fuel Exhibit EF-3.

Q. How was the deferred tax asset handled in the 2022 Rate Case?

A. The total amount of the deferred tax asset was $624,618. The Company proposed to pass back the deferred tax asset to ratepayers over a 3-year straight-line amortization period. The Company amortized $416,412 of the deferred tax asset by the completion of the historic test year ended September 30, 2025. The remaining $208,206 will be amortized and passed back to ratepayers in fiscal year 2026.

Q. How does the Company propose to address the remaining regulatory liability?

A. The amortization of the regulatory liability established for the Medicare subsidy of $921,649 was not included in the revenue requirement calculation in the 2022 Rate Case. The Company proposes to amortize the full regulatory liability balance over three years, which results in an increase to the revenue requirement of $307,216 annually over the three-year period.

Q. What is the total FPFTY income tax expense for National Fuel?

A. The *pro forma* tax expense at present and proposed rates is shown on Schedule D-11 at Line 35 is $2.2 million.

Q. Does the Company have any income tax loss carryovers that affect the HTY, FTY, or FPFTY?

A. No. For ratemaking purposes, income tax expense is calculated using the standalone methodology required by PAPUC. This approach excludes certain book-to-tax differences from the taxable income calculation. While the Company's separate Pennsylvania tax return may reflect a net operating loss ("NOL") due to book-to-tax differences, the ratemaking calculation results in taxable income for the HTY, FTY, and FPFTY. Therefore, no NOL carryovers are generated or applied in determining income tax expense for this proceeding.

VI. ACCUMULATED DEFERRED INCOME TAXES

Q. How are Accumulated Deferred Income Taxes ("ADIT") calculated?

A. Schedule C-6 of Exhibit A (FPFTY) shows the ending balance for federal ADIT as of October 31, 2027. This amount is deducted from rate base. The total shown on Line 1 reflects the difference in income tax expense for book and tax purposes attributable to the difference between accelerated tax depreciation and straight-line book depreciation on FPFTY plant balances, net of basis differences associated with CIAC and UNICAP rules per IRC Section 263A. As state tax consequences are flowed through, there is no associated state ADIT balance.

Q. What is the amount of the ADIT offset to rate base?

A. As shown on Line 4 of Schedule C-6 and on Line 6 of Schedule A-1, the ADIT offset is $73.9 million, which includes the amount related to excess ADIT discussed further in Section F.

Q. Would a net operating loss carryforward be included in a utility's ADIT?

A. No, a NOL carryforward is not includable in ADIT, as deferred tax assets (if applicable) are not recorded in Account 282 (Accumulated Deferred Income Taxes – Plant Related). Since only items from Account 282 are included in ADIT for the purpose of rate base, NOLs do not affect the Company's rate base calculation.

Q. Has the Company's ADIT rate base deduction been calculated in compliance with the normalization requirements of the IRC?

A. Yes. The Company's calculation accurately reflects the proration methodology of the ADIT rate base component in accordance with Treasury Regulation 1.167(l)-1(h)(6)(ii). The proration methodology is a specific method promulgated by the Internal Revenue Service ("IRS") for calculating ADIT, for any rate filing that includes a future test period, which must be followed for ratemaking purposes to comply with IRS normalization requirements. Compliance with the normalization rules is necessary for a company to claim accelerated depreciation for tax filing purposes. Accelerated tax depreciation, versus straight-line depreciation, provides a cash-flow benefit for a company. The Company receives a cash-flow benefit from accelerated tax depreciation (via a reduction in current income taxes payable) and ratepayers receive a benefit via a rate base reduction resulting from netting ADIT against rate base. The methodology is designed to account for the period of time the Company has received the ADIT and provide the appropriate limit on the amount of ADIT that can be excluded from rate base as determined by the IRS. See National Fuel Exhibit EF-1, Page 2 for the calculation of the pro-rata adjustment.

VII. CONSOLIDATED TAX ADJUSTMENT

Q. Does the Company's proposed revenue requirement reflect a federal consolidated tax adjustment?

A. No. The Company's revenue requirement is established based on its stand-alone federal income tax attributes. It is my understanding that Act 40 of 2016, which added 66 Pa. C.S § 1301.1 to the Public Utility Code, eliminates the need to show a consolidated tax adjustment for ratemaking purposes. There are no consolidated tax savings adjustments due to the Company being in a taxable loss prior to the ratemaking adjustments.

VIII. IRS UPDATE

Q. Is the Company currently under audit by the IRS?

A. The Company is in the IRS Compliance Assurance Process ("CAP") Program. The Company is in the Bridge Plus phase of the CAP program. The CAP program is intended for taxpayers with a low risk of non-compliance who are cooperative and transparent with few, if any, material issues that require resolution. To participate in the Bridge Plus phase, the taxpayer must submit a documentation package no later than four months after the end of the fiscal year. The IRS conducts a risk assessment review, and a draft tax return must be submitted to the IRS 30 days before filing the final return. If the filed return is consistent with the documentation package, and no issues were found, the taxpayer will be issued a full acceptance letter and a No Change Letter one month after filing the return.

Q. Please explain the Company's accounting treatment of the Repairs Tax Method and changes related to Revenue Procedure 2023-15.

A. The Company treats certain expenditures that are capitalized for book purposes as deductible for tax repair purposes. For linear property, the Company follows the guidance detailed in Revenue Procedure 2023-15. For non-linear property, the Company deducts the costs of repairs incurred in connection with the repair and maintenance of their network assets pursuant to Internal Revenue Code Section 162. On April 14, 2023, the IRS released Revenue Procedure 2023-15, providing a "natural gas transmission and distribution property safe harbor method of accounting" ("NGSH Method") that taxpayers may use to determine whether expenses to repair, maintain, replace, or improve natural gas transmission and distribution property must be capitalized or be allowable as deductions for repairs. The revenue procedure is effective for taxable years ending after May 1, 2023. Adopting the NGSH Method requires a change in accounting method, and the new guidance provides detailed implementation procedures. For the Company's fiscal year 2023 tax return, an application for change in method of accounting was filed to adopt Revenue Procedure 2023-15 for linear property only. The fiscal year 2023 application for the change in accounting method and corresponding Section 481(a) adjustment was reviewed and accepted by the IRS as part of the CAP program. In conformity with the Revenue Procedure 2023-15, the Company notified the PAPUC in August 2024 of the change in the method of accounting and provided the related IRS Form 3115 at that time. The Company has since followed Revenue Procedure 2023-15 in determining linear property tax repairs.

Q. What effect or benefit does the Repairs Tax Method have for ratepayers?

A. When comparing the repairs deduction ($37.7 million) to the repairs deduction included in the previous PA rate case ($6.8 million), and based on the lower taxable income, excluding the impact of other tax effects, it is estimated that rate payers are saving approximately $10 million in tax expense from the reduction in taxable income due to the increase in repairs deductions.

Q. Does the Company have any unresolved tax issues related to any IRS audits?

A. No. The issue discussed in the 2022 Rate Case has been resolved due to the release of Revenue Procedure 2023-15 as discussed above.

IX. EXCESS ACCUMULATED DEFERRED INCOME TAXES

Q. Has the Company reflected the amortization of Excess Accumulated Deferred Income Taxes ("excess ADIT"), as a result of the TCJA, as part of its income tax calculation?

A. Yes, the Company has calculated the amount of the excess ADIT that will be amortized and flowed back to ratepayers in its FPFTY. This amount of amortization of protected excess ADIT is included in the overall federal deferred tax expense calculated on Schedule D-11. The FPFTY amortization is $1.0 million, calculated using the ARAM as required by tax normalization rules. The Company utilizes the PowerTax software to calculate and maintain the ADIT balances on the ARAM. The Company has calculated the amount of the deficient unprotected ADIT that will be amortized and recovered from the ratepayers over a ten-year period (FY 2018-2027) on a straight-line basis. The

amortization will conclude on September 30, 2027. The amortization for unprotected deficient ADIT is $0.9 million and is included in the overall federal deferred tax expense calculated on Schedule D-11. Both amounts were previously documented and explained in Docket Nos. M-2018-2641242 and R-2018-3000527.

X. PENNSYLVANIA CORPORATE TAX RATE DECREASE

Q. How does the Company plan to account for the Pennsylvania corporate tax rate decrease?

A. On July 8, 2022, House Bill 1342 was signed into law in Pennsylvania. The law reduced the corporate income tax rate from 9.99% to 8.99% initially and reduces the rate by 0.5% annually until it reaches 4.99% each calendar year, with the new rate effective for tax year beginning on or after January 1 each year. The tax rate will gradually decrease each year through fiscal year 2032. Since the Company is a fiscal year taxpayer, its tax year begins on October 1 and runs through September 30. For the Company's HTY and FTY, 8.49% and 7.99% are used, respectively. Since the FPFTY includes the Company's fiscal 2027 tax year, the tax rate of 7.49% has been utilized on Schedule D-11.

XI. POWERTAX UPGRADE

Q. Why is National Fuel transitioning from PowerTax software to the cloud-based Tax Fixed Assets platform, and how are the associated costs reflected in the O&M forecast in FFPTY?

A. National Fuel currently utilizes PowerTax for tax depreciation and deferred tax calculations. PowerTax standard support will end on December 31, 2025 and will reach

end-of-life by December 31, 2027. To ensure continuity, National Fuel will be upgrading the software to the software provider's cloud-based solution Tax Fixed Assets during fiscal year 2026. The associated implementation and Software-as-a-Service (SaaS) fees have been incorporated into the Operations and Maintenance (O&M) forecast. Please refer to the Direct Testimony of Anthony T. Formato (National Fuel Statement No. 3) for additional information.

Q. Does this conclude your direct testimony at this time?

A. Yes.

NATIONAL FUEL EXHIBIT EF-1

National Fuel Gas Distribution Corporation
Pennsylvania Division
Accumulated Deferred Income Tax Rollforward
Twelve Months Ending October 31, 2027
($000)

	Deferred Tax Expense			Account 282 Acc. Def. Inc. Tax	
	ARAM/R &M	FED	Total	Dr/(Cr)	
Balance at Sept 30, 2025 - Per Books				(76,126)	
Deferral: 10/1/25 - 9/30/26 (12 mos)					
Depreciation, Depletion and Amortization		(276)	(276)		
CIAC		(189)	(189)		
UNICAP		(126)	(126)		
ARAM Amortization	(950)		(950)		
	(950)	(591)	(1,541)	1,541	
Balance at Sept 30, 2026				(74,585)	
Link Month Deferral: 10/1/2026-10/31/2026	(79)	19	(60)	60	
				(74,525)	
Deferral: 11/1/26 - 10/31/27 (12 mos)					
Depreciation, Depletion and Amortization		(38)	(38)		
CIAC		(189)	(189)		
UNICAP		(126)	(126)		
ARAM Amortization	(950)		(950)		
	(950)	(353)	(1,303)	1,303	
Balance at October 31, 2027				(73,222)	
Prorated Balance					**(73,925)**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Calculation of Pro-Rata Accumulated Deferred Income Tax
Twelve Months Ending October 31, 2027
Fully Projected Future Test Year
($000)

				Deferred Tax Expense			Net	ACCT. 282		Total	Prorated
				ARAM/R&M	FED	Total	(Incr)/Decr	Balance		Proration	ACCT. 282
Link Month		Oct	2026					(74,525)			(74,525)
	365				21%						
30	335	Nov	2026	(81)	(33)	(114)	114	(74,411)	91.78%	105	(74,420)
31	304	Dec	2026	(79)	(29)	(108)	108	(74,303)	83.29%	90	(74,330)
31	273	Jan	2027	(79)	(29)	(108)	108	(74,195)	74.79%	81	(74,249)
28	245	Feb	2027	(79)	(29)	(108)	108	(74,087)	67.12%	72	(74,177)
31	214	Mar	2027	(79)	(29)	(108)	108	(73,979)	58.63%	63	(74,114)
30	184	Apr	2027	(79)	(29)	(108)	108	(73,871)	50.41%	54	(74,060)
31	153	May	2027	(79)	(29)	(108)	108	(73,763)	41.92%	45	(74,015)
30	123	Jun	2027	(79)	(29)	(108)	108	(73,655)	33.70%	36	(73,979)
31	92	Jul	2027	(79)	(29)	(108)	108	(73,547)	25.21%	27	(73,952)
31	61	Aug	2027	(79)	(29)	(108)	108	(73,439)	16.71%	18	(73,934)
30	31	Sep	2027	(79)	(29)	(108)	108	(73,331)	8.49%	9	(73,925)
31	0	Oct	2027	(79)	(30)	(109)	109	(73,222)	0.00%	-	(73,925)
12 MOS END		Oct	2027	(950)	(353)	(1,303)	1,303			600	
								Prorated Balance			**(73,925)**

NATIONAL FUEL EXHIBIT EF-2

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Historic Test Period - 12 Months Ended September 30, 2025
($ in Thousands)

Exhibit EF-2
Witness: E. Forcucci
Page 1 of 1

Other Income Tax Adjustments

Line #	Description	[1] Factor Or Reference	[2] Element Or Amount	[3] Pro Forma Test Year At Present Rates
	Other Adjustments - State Current			
1	Repair & Maintenance Perm. Difference		(27,430)	
2	CIAC		1,200	
3	UNICAP		584	
4	Meals/Entertainment Adjustment (TRA-86)		70	
5	Total Other Adjustments - State	Sum (L 1 to L4)		(25,576)
	Other Adjustments - Federal Current			
6	Repair & Maintenance Perm. Difference		(27,430)	
7	CIAC		1,200	
8	UNICAP		584	
9	Meals/Entertainment Adjustment (TRA-86)		70	
10	Total Other Adjustments - Federal	Sum (L 6 to L 9)		(25,576)
	Depreciation Adjustment - Federal Deferred			
11	Adjust for Book Flow Through Depreciation		6,401	6,401
	Other Adjustments - Federal Deferred			
12	CIAC		1,200	
13	UNICAP		584	
14	Total Other Adjustments - Deferred	Sum (L 12 to L 13)		1,784

NATIONAL FUEL GAS DISTRIBUTION CORPORATION | **Exhibit** | **EF-2**
Before the Pennsylvania Public Utility Commission | **Witness:** | **E. Forcucci**
Future Test Period - 12 Months Ended September 30, 2026 | **Page 1 of 1**
($ in Thousands)

Other Income Tax Adjustments

Line #	Description	[1] Factor Or Reference	[2] Element Or Amount	[3] Pro Forma Test Year At Present Rates
	Other Adjustments - State Current			
1	Repair & Maintenance Perm. Difference State		(34,340)	
2	CIAC		900	
3	UNICAP		600	
4	Meals/Entertainment Adjustment (TRA-86)		72	
5	Total Other Adjustments - State	Sum (L1 to L4)		(32,768)
	Other Adjustments - Federal Current			
6	Repair & Maintenance Perm. Difference State		(34,340)	
7	CIAC		900	
8	UNICAP		600	
9	Meals/Entertainment Adjustment (TRA-86)		72	
10	Total Other Adjustments - Federal	Sum (L6 to L9)		(32,768)
	Depreciation Adjustment - Federal Deferred			
11	Adjust for Book Flow Through Depreciation		6,800	6,800
	Other Adjustments - Federal Deferred			
12	CIAC		900	
13	UNICAP		600	
14	Total Other Adjustments - Deferred	Sum (L12 to L13)		1,500

NATIONAL FUEL GAS DISTRIBUTION CORPORATION | **Exhibit EF-2**
Before the Pennsylvania Public Utility Commission | **Witness: E. Forcucci**
Fully Projected Future Period- 12 Months Ended October 31, 2027 | **Page 1 of 1**
($ in Thousands)

Other Income Tax Adjustments

Line #	Description	[1] Factor Or Reference	[2] Element Or Amount	[3] Pro Forma Test Year At Present Rates
	Other Adjustments - State Current			
1	Repair & Maintenance Perm. Difference State		(37,685)	
2	CIAC		900	
3	UNICAP		600	
4	Meals/Entertainment Adjustment (TRA-86)		76	
5	Total Other Adjustments - State	Sum (L1 to L4)		(36,109)
	Other Adjustments - Federal Current			
6	Repair & Maintenance Perm. Difference State		(37,685)	
7	CIAC		900	
8	UNICAP		600	
9	Meals/Entertainment Adjustment (TRA-86)		76	
10	Total Other Adjustments - Federal	Sum (L6 to L9)		(36,109)
	Depreciation Adjustment - Federal Deferred			
11	Adjust for Book Flow Through Depreciation		7,938	7,938
	Other Adjustments - Federal Deferred			
12	CIAC		900	
13	UNICAP		600	
14	Total Other Adjustments - Deferred	Sum (L12 to L13)		1,500

NATIONAL FUEL EXHIBIT EF-3

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Twelve Months Ended September 30, 2025
($ in Thousands)

Exhibit EF-3
Witness: E. Forcucci
Page 1 of 1

MEDICARE DRUG SUBSIDY ACTIVITY SUMMARY

		ACC DEF TAX REG LIAB	
Activity By Year		2,430,035	(2,430,035)
FY 2006		816,989	(816,989)
FY 2007		683,586	(683,586)
FY 2008		806,724	(806,724)
FY 2009		(4,150,634)	3,853,604
FY 2010		-	-
FY 2011		-	-
FY 2012		37,918	(37,918)
FY 2013			
FY 2024	Amortization	(208,206)	
FY 2025	Amortization	(208,206)	
Bal as of September 30, 2025		208,206	(921,648)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 12-R

Rebuttal Testimony of
Erica L. Forcucci

Topics Addressed: Income Taxes

Dated: May 12, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Erica L. Forcucci. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. Did you previously submit testimony in this proceeding on behalf of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company")?

A. Yes. I submitted my direct testimony, National Fuel Statement No. 12, on January 28, 2026.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your rebuttal testimony.

A. To respond to Lafayette K. Morgan Jr.'s OCA Statement No. 2 regarding state income tax expense for the fully projected future test year ending October 31, 2027 ("FPFTY").

Q. Are you sponsoring any exhibits with your rebuttal testimony?

A. Yes. I am sponsoring Exhibit EF-1R which includes applicable tax rates for taxable years beginning on or after the dates reflected in the Exhibit and a copy of the Secretarial Letter Regarding Corporate Net Income Tax ("CNIT") and State Tax Adjustment Surcharge Dated December 8, 2025.

III. CORPORATE STATE INCOME TAX

Q. What issue are you addressing related to OCA Statement No. 2?

A. Mr. Morgan asserts that, for purposes of determining the revenue requirement, the Company should utilize a Pennsylvania Corporate Income Tax rate of 6.99% for the FPFTY. This assertion is based on the premise that the Pennsylvania state tax rate for National Fuel decreases from 7.49% to 6.99% on January 1, 2027 as a result of the reduction in tax rate outlined in House Bill 1342. However, this premise does not accurately reflect the implementation of House Bill 1342. Mr. Morgan recommends that the Company adjust the revenue requirement to account for the difference in Pennsylvania corporate income tax rates.

Q. Why does Mr. Morgan's position not properly reflect the applicable tax rate?

A. As referenced in the Direct Testimony Statement No.12, Section X, on July 8, 2022, House Bill 1342 was signed into law in Pennsylvania. The law reduced the corporate income tax rate from 9.99% to 8.99% initially and reduces the rate by 0.5% annually until it reaches 4.99%, with the new rate effective for a tax year beginning on or after January 1 each year. The tax rate will gradually decrease each year through fiscal year 2032. Since the Company is a fiscal year taxpayer, its tax year begins on October 1 and runs through September 30.

See Exhibit EF-1R for the applicable tax rates for taxable years ***beginning on or after*** the dates reflected in the Exhibit. The FPFTY of November 1, 2026, through October 31, 2027 falls within Tax Year 2026, as the fiscal year begins after January 1, 2026. Accordingly, the Company is subject to the 7.49% tax rate for this period. To be clear, National Fuel is required to and will pay the 7.49% rate from October 1, 2026

through September 30, 2027. The 6.99% rate does not become effective for National Fuel until October 1, 2027. See Exhibit EF-1R for Secretarial Letter Regarding Corporate Net Income Tax and State Tax Adjustment Surcharge dated December 8, 2025 reflecting the "step down" in CNIT to 7.49% effective for the fiscal year beginning on or after January 1, 2026.

Q. Does Mr. Morgan's statement support this interpretation?

A. Yes. OCA Statement No. 2 states: "The Company used the ***2026 tax rate of 7.49%***". Mr. Morgan acknowledges that the Pennsylvania corporate income tax rate for Tax Year 2026 is 7.49%. As National Fuel is a fiscal year taxpayer and the FPFTY falls within Tax Year 2026, the tax rate of 7.49% is applicable for National Fuel's FPFTY.

IV. UNCONTESTED TAX ISSUE

Q. Are there any other issues that you wish to note.

A. Yes. In my Direct Testimony, I explained that the amortization of the regulatory liability established for the Medicare subsidy of $921,649 was not included in the revenue requirement calculation in the 2022 Rate Case. The Company proposes to amortize the full regulatory liability balance over three years, which results in a decrease to the revenue requirement of $307,216 annually over the three-year period. No party submitted testimony with respect to this item related to the Company's proposed treatment. Therefore, the Company requests that this methodology be approved.

Q. Does this conclude your rebuttal testimony at this time?

A. Yes.

NATIONAL FUEL EXHIBIT EF-1R

Pennsylvania Corporate Net Income Tax Rates

72 Pa. Stat. § 7402(b), *as amended by* 2022 Pa. H.B. 1342

Taxable Year	Tax Rate
January 1, 2023, through December 31, 2023	8.99%
January 1, 2024, through December 31, 2024	8.49%
January 1, 2025, through December 31, 2025	7.99%
January 1, 2026, through December 31, 2026	7.49%
January 1, 2027, through December 31, 2027	6.99%
January 1, 2028, through December 31, 2028	6.49%
January 1, 2029, through December 31, 2029	5.99%
January 1, 2030, through December 31, 2030	5.49%
January 1, 2031, and each taxable year thereafter	4.99%

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National Fuel®

December 8, 2025

VIA ELECTRONIC FILING
Mr. Matthew Homsher
Pennsylvania Public Utility Commission
400 North Street, Second Floor North
P.O. Box 3265
Harrisburg, PA 17120-3265

RE: National Fuel Gas Distribution Corporation's ("**National Fuel**" or "**Company**") Response to Secretarial Letter dated December 4, 2025 (the "**Secretarial Letter**") Regarding Corporate Net Income Tax ("**CNIT**") and State Tax Adjustment Surcharge ("**STAS**")
Docket No. M-2025-3059055

Dear Secretary Homsher:

In response to the Secretarial Letter, National Fuel hereby reports that its tax year runs annually from October 1 through the following September 30 ("**Fiscal Year**"). Since the "step-down" in CNIT to 7.49% is effective at the beginning of the calendar year *or fiscal year* beginning on or after January 1, 2026, the 7.49% CNIT step-down will not result in a modification to National Fuel's STAS Rider B until October 1, 2026.

Based on past discussion with Commission Staff, the Company: (a) was requested to provide this information via the instant filing with the Commission; and (b) directed to provide the supporting information specified in the Secretarial Letters at least ten (10) days prior to the start of its Fiscal Year beginning on October 1, 2026.[1]

Copies of this filing are being provided to the statutory parties and Commission Staff as indicated below. Should you have any questions or concerns, please do not hesitate to contact me at (814) 871-8177.

Very truly yours,

Dominick A. Sisinni

cc: Allison Kaster, Bureau of Investigation and Enforcement – (akaster@pa.gov)
Darryl A. Lawrence, Office of Consumer Advocate – (ra-oca@paoca.org)
NazAarah Sabree, Office of Small Business Advocate – (ra-sba@pa.gov)
Marc Hoffer, Bureau of Technical Utility Standards – (mhoffer@pa.gov)

[1]This approach is consistent with the manner in which National Fuel has handled previous CNIT "step-downs." *See, e.g.*, Letter from National Fuel filed at Docket No. M-2023-3045040 on December 20, 2023; Letter from National Fuel filed at Docket No. M-2024-3052174 on December 3, 2024.

Docusign Envelope ID: 629E61FB-C19A-4285-AB3B-E2E7D326BA00

VERIFICATION

I, Brendan M. Harrington, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 12/8/2025

Signed by:
Brendan Harrington
260D448320A9447...

Brendan M. Harrington
Assistant Vice President

Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Harrisburg, PA 17105-3265
EFILING - FILING DETAIL

Date Created	Filing Number
12/9/2025	2933528

Exhibit EF-1R
Witness: E. Forcucci
Page 4 of 4

Your filing has been electronically received. Upon review of the filing for conformity with the Commission's filing requirements, a notice will be issued acknowledging acceptance or rejection (with reason) of the filing. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

The date filed on will be the current day if the filing occurs on a business day before or at 4:30 p.m. (EST). It will be the next business day if the filing occurs after 4:30 p.m. (EST) or on weekends or holidays.

Docket Number: M-2025-3059055
Case Description:
Transmission Date: 12/9/2025 7:42 AM
Filed On: 12/9/2025 7:42 AM
eFiling Confirmation Number: 2933528

File Name	Document Type	Upload Date
2025.12.08 -- NFGDC Letter re CNIT and STAS.pdf	Letter	12/9/2025 7:42:05 AM

For filings exceeding 250 pages, the PUC is requiring that filers submit one paper copy to the Secretary's Bureau within three business days of submitting the electronic filing online. Please mail the paper copy along with copy of this confirmation page to Secretary, Pennsylvania Public Utility Commission, 400 North Street, Harrisburg PA 17120 a copy of the filing confirmation page or reference the filing confirmation number on the first page of the paper copy.

No paper submission is necessary for filings under 250 pages.

You can view a record of this filing and previous filings you have submitted to the PUC by using the links in the Filings menu at the top of the page. Filings that have been submitted within the last 30 days can be viewed by using the Recent Filings link. Older filings can be viewed by using the search options available in the Filing History link.

NATIONAL FUEL STATEMENT NO. 13

CATHRYN E. HILLIARD

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 13

Direct Testimony of
Cathryn E. Hilliard

Topics Addressed: Test Year Sales Volumes and Accounts

Dated: January 28, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Cathryn E. Hilliard. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. By whom and in what capacity are you employed?

A. I am employed by National Fuel Gas Distribution Corporation ("NFGDC") as a Lead Utility Analyst in the Rates and Regulatory Affairs department. In this role, I oversee demand forecasting for NFGDC's Pennsylvania Division ("National Fuel" or the "Company").

Q. Please provide your educational background.

A. I received a Bachelor of Arts degree in Psychology and Political Science from the State University of New York ("SUNY") at Buffalo in May 2012. I received a Master of Business Administration degree from SUNY Buffalo in May 2014.

Q. Please provide your professional experience.

A. In May 2014, I began my employment with National Fuel in the MBA Associate rotational program, working six-month cycles in the Rates and Regulatory Affairs, Finance, Energy Services, and Engineering departments. Upon completion of this program, I joined the Energy Services department in June 2016, as an Energy Consultant, and was promoted in February 2020 to Senior Energy Consultant. In 2022, I was promoted to Director of Energy Transition Development in the Finance department. I

joined the Rates and Regulatory Affairs department in February 2025, as Lead Utility Analyst to oversee the market planning team.

Q. Have you previously testified in other proceedings before the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission") or any other state or federal agency?

A. No, I have not.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your testimony.

A. I will address the development of National Fuel's sales and account forecast for the historic test year ended September 30, 2025 ("HTY"), future test year ending September 30, 2026 ("FTY"), and fully projected future test year ending October 31, 2027 ("FPFTY").

Q. Are any other witnesses providing testimony on the areas you identified above?

A. Yes. The Direct Testimony of Courtney T. Mann (National Fuel Statement No. 14) discusses the Company's revenue forecast, which utilizes the sales and account forecast.

Q. Are you sponsoring any exhibits in this proceeding?

A. Yes, I am sponsoring the following exhibits: National Fuel Exhibit CEH-1 (10 Year Normal Heating Degree Days), National Fuel Exhibit CEH-2 (Peak Day Results & Methodology), National Fuel Exhibit CEH-3 (Forecast Methodology), National Fuel

Exhibit CEH-4 (FTY & FPFTY Accounts), National Fuel Exhibit CEH-5 (Erie, Pennsylvania Annual Heating Degree Days), and National Fuel Exhibit CEH-6 (Heating Degree Day Comparison). Each of these exhibits are described later in my testimony.

III. SALES AND ACCOUNT FORECASTING PROCESS

Q. Please provide a general overview of the Company's throughput forecast.

A. Each year, for system planning purposes, the Company prepares a five-year forecast ("Master Estimate") of natural gas consumption for its sales and transportation customers. The Company has based the forecast of sales and transportation volumes and the number of customers used in this proceeding on its most recently completed Master Estimate. The Company's Master Estimate segments its market into residential, commercial, public authority and industrial categories. The Master Estimate provides monthly sales and transportation volumes and the number of customers on a fiscal year (12 months ended September) time frame. The commercial, industrial, and public authority categories are further segregated into small and large volume categories using a throughput limit of 25,000 Mcf per year. Further detail on the forecast process, including sources of data, methodology, dependent, and independent variables used in the forecast are detailed in National Fuel Exhibit CEH-3.

Q. Please describe the residential, small commercial, small industrial, and public authority sales forecast.

A. The Company sales forecast for residential, commercial, industrial, and public authority customers under the 25,000 Mcf/year threshold is the product of separate econometric

forecasts for usage per account and the number of accounts. The results of the volumetric FTY and FPFTY forecasts are detailed in SDR-COS-18 and the results of the account FTY and FPFTY forecasts are detailed in National Fuel Exhibit CEH-4.

Q. Why have you chosen econometric modeling to forecast use-per-account?

A. The word "econometric" means measuring economic relationships. The technique of econometric modeling incorporates hypotheses from economic theory and statistical tests of those hypotheses. The economic theory of consumer behavior, for example, postulates that the price of natural gas, weather, and historical usage trends independent of weather (e.g., consumer preference) are major determinants of household natural gas usage.

Q. Please explain why separate forecasts are specified for use-per-account and the number of accounts.

A. Each of these components of total consumption is influenced by different factors, which require independent and dependent variables to be applied and analyzed separately. Total consumption for a customer class is the summation of the products of average use-per-account and the number-of-accounts for each summarized tariff service class. The greater structure afforded by separate analyses of use-per-account and number-of-accounts is desirable for both model specification and forecast validation purposes. This is true for the residential, commercial, industrial, and public authority customer categories under the 25,000 Mcf per year threshold. Large volume customers' (accounts consuming greater than 25,000 Mcf per year) usage per account and number of accounts

are forecasted separately within the Large Volume Forecast process detailed below in this testimony.

Q. Why were industrial accounts in the greater-than-25,000 Mcf per year category forecasted individually, as opposed to an econometric derivation?

A. The lack of homogeneity in this group renders it unsuitable for econometric forecasting. These larger accounts have different natural gas requirements, applications, and alternate fuel-burning capabilities. Consequently, an individual customer forecast approach has been, and continues to be, the most appropriate.

Q. Did the Company always use 25,000 Mcf/year as the segmentation threshold between large and small volume customers?

A. No. In Docket No. R-2022-3035730 (the "2022 Rate Case"), the Company used a segmentation threshold of 50,000 Mcf per year to differentiate between large and small volume customers.

Q. Why did the Company reduce the segmentation threshold between large and small volume customers from 50,000 Mcf/year to 25,000 Mcf/year since the 2022 Rate Case?

A. Based on the volumetric variability seen within customer accounts utilizing 25,000 – 50,000 Mcf /year and given that customers in these segments utilize gas for a wide variety of purposes other than just space heating, these customers were included within the large volume category starting in 2023.

Q. Which customer service classes are included within the large volume customer segments that are individually forecasted?

A. The large volume industrial category consists of Intermediate Volume Industrial Service ("IVIS") customers consuming between 25,000 and 50,000 Mcf per year, Large Volume Industrial Service ("LVIS"), industrial customers consuming between 50,000 and 200,000 Mcf per year, Large Industrial Service ("LIS"), which consists of industrial customers consuming over 200,000 Mcf per year, and Daily Metered Large Manufacturing Transportation Service ("DMLMTS"), which consists of customers consuming greater than 2,000,000 Mcf per year. The large volume commercial category consists of customers consuming at least 25,000 Mcf per year, and NGV customers. The large volume public authority category consists of large public authority customers consuming at least 25,000 Mcf per year.

Q. How was the Large Volume Forecast prepared for accounts consuming greater-than-25,000 Mcf per year?

A. The large volume customers are forecasted based on individual customer account historical usage and feedback. Each customer was contacted by the Company's appropriate major account representative of the Energy Services department, who is the primary liaison between the Company and the customer and is the individual most familiar with each customer's energy decisions. The customers were asked to estimate their monthly and annual usage, paying particular attention to any events that may alter their estimated future consumption levels. The results of these forecasts are then assessed

by the Company's Rates and Regulatory Affairs and Energy Services departments. If contact with a large volume customer is unable to be established, monthly historical usage is analyzed to determine their projected annual throughput.

Q. What level of annual heating degree days ("HDD") were used to develop the projected sales volumes?

A. The level of HDDs used to project weather impacted customers in this proceeding is 5,485. Normal HDDs ("NHDD") values utilize a 10-year average based on the period 2015-2024 as published by the National Oceanic and Atmospheric Administration ("NOAA"), for the first-order National Weather Service Office located at the Erie, Pennsylvania International Airport. National Fuel Exhibit CEH-1 details the forecasted HDD on a monthly and daily basis.

Q. Is the use of average temperature data as provided by NOAA for the Erie, Pennsylvania station (ERIE INTL AP, PA US USW00014860) consistent with the methodology used for calculating NHDD in previous National Fuel base rate cases?

A. Yes. National Fuel has consistently used the NHDD averages as provided by NOAA in previous base rate cases.

Q. Why is National Fuel utilizing a 10-year average of NOAA Summary of Daily Normals 2015-2024, for the Erie, Pennsylvania Station ("10-Year NOAA HDD Set") for normalization in this forecast?

A. The Company made this adjustment in normalization to more accurately reflect the recently experienced weather trends relevant to forecasting monthly billed sales for rate setting purposes. Further, the Company completed a review of the actual heating degree days experienced at the Erie, Pennsylvania station per month from January 2006 through September 2025. This review, as detailed in National Fuel Exhibit CEH-5, showed that HDDs have decreased relative to time. This indicates an annual warming trend in the Company's service territory. Additionally, the Company also conducted a comparison of actual heating degree days versus both the historical NOAA 10-year HDD average (2015-2024) and NOAA 15-year HDD average (2006-2020). The results of this comparison can be found in National Fuel Exhibit CEH-6, which demonstrates the standard deviation of the difference between actual experienced HDDs and the 10- or 15-year degree day sets. The results of this comparison show that in the more recent years the standard deviation for the 10-year degree day set is less than that of the 15-year set. Thus, the 10-year set more accurately captures the current weather trends.

Q. Has the Commission relied upon a 10-year HDD average in any other circumstances?

A. Yes. In Columbia Gas of Pennsylvania's ("Columbia") last base rate proceeding (Docket No. R-2025-3053499) the Commission directed Columbia to use a 10-year average HDD for its Weather Normalization Adjustment. Therein, the Commission noted that the 20-year average HDD appears to result in "historical bias" that diminishes the effect of recent warming trends. In addition, Valley Energy, Inc. (Docket No. R-2022-3032300), has utilized a 10-year normal heating degree day average during its rate case. The

Company believes that a 10-year NHDD average is appropriate for the sales forecast based on industry trends and recent weather patterns.

Q. Does using the 10-Year NOAA HDD Set for normalization in this forecast impact anything beyond the demand forecast?

A. Yes. The 10-Year NOAA HDD Set is also being applied to the calculation of the Weather Normalization Adjustment. This is detailed in the Direct Testimony of John D. Taylor, National Fuel Statement No. 19.

Q. Why did National Fuel utilize a multi-year regression period for the residential, small commercial, small industrial, and small public authority forecasts?

A. Consistent with the approach in the Company's previous rate cases, multi-year regression periods were utilized because it provided a larger sample size of data to smooth out short-term variations and capture underlying long-term usage per account trends. Historically, this method has provided more accurate usage per customer during periods where rates are in effect.

Q. Would you please summarize the volumetric results of your forecast?

A. The Company's volumetric forecast is shown on SDR-RR-07 and SDR-COS-18. These data requests detail the projected volumetric usage by Revenue Class Type and by Service Class Type for the FTY and the FPFTY. In addition, the accounts and Mcf per account forecast regression methodology is detailed in National Fuel Exhibit CEH-3 and the results detailed in SDR-RR-11.

Q. Please explain SDR-COS-18.

A. National Fuel Exhibit SDR-COS-18 pages 2 and 3 summarize by month and in total the projected sales and transportation volumes for the FTY and the FPFTY. National Fuel Exhibit CEH-4 summarizes by month and in total the projected number of sales and transportation accounts for the FTY and the FPFTY.

Q. Please explain National Fuel Exhibit CEH-4.

National Fuel Exhibit CEH-4 summarizes by month and in total the projected number of sales and transportation accounts for the FTY and the FPFTY. For purposes of the forecasting process, the Company interprets the historical customer counts as the customer monthly cycle bills plus 50% of the final and 50% of the initial bills issued to customers.

Q. How were normalized sales determined for the FTY?

A. The actual historic usage per customer and customer accounts serve as the starting point for the development of the normalized FTY sales, as shown in SDR-COS 18. All the adjustments made in the development of the FPFTY sales forecast were also made in the development of the FTY sales forecast.

Q. Does this conclude your direct testimony at this time?

A. Yes, it does.

NATIONAL FUEL EXHIBIT CEH-1

National Oceanic and Atmospheric Association (NOAA)
Erie, Pennsylvania
Normal Degree Days 2015 - 2024
FINAL

Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
1	31	35	28	24	10	3	0	0	1	6	16	27	
2	32	36	32	23	11	3	0	0	1	5	16	23	
3	31	34	32	20	9	2	0	0	1	6	15	25	
4	32	33	34	22	10	2	0	0	0	5	12	27	
5	38	37	35	22	12	2	0	0	1	6	9	27	
6	39	37	32	17	13	3	0	0	1	2	10	29	
7	38	30	29	20	11	2	0	0	1	4	15	30	
8	36	34	26	19	13	3	0	0	1	7	17	30	
9	34	34	23	17	12	3	0	0	2	7	17	25	
10	33	36	25	18	10	2	0	0	1	7	17	26	
11	30	34	29	14	11	1	0	0	1	5	18	27	
12	30	37	30	12	9	1	0	0	1	5	23	29	
13	37	41	27	12	10	2	0	0	1	9	25	30	
14	40	39	24	15	9	2	0	0	1	10	25	30	
15	38	35	28	16	8	1	0	0	2	9	22	29	
16	38	36	25	15	5	1	0	0	1	12	22	27	
17	37	38	24	18	6	1	0	0	0	15	21	28	
18	35	36	27	16	6	1	0	0	1	14	20	32	
19	35	34	29	15	3	0	0	0	2	12	22	34	
20	39	32	27	18	6	0	0	0	2	9	25	32	
21	38	27	28	17	5	0	0	0	1	8	25	30	
22	35	28	28	20	5	1	0	0	2	8	28	28	
23	32	28	27	16	4	0	0	0	3	9	27	28	
24	35	28	22	18	2	0	0	0	2	11	24	28	
25	34	32	22	16	2	0	0	1	1	12	22	31	
26	34	35	22	18	2	0	0	0	2	15	21	30	
27	35	31	24	15	3	1	0	0	2	15	23	26	
28	37	29	25	14	3	1	0	0	2	14	26	27	
29	38		25	15	3	0	0	0	5	13	27	27	
30	41		22	16	2	0	0	0	6	15	26	27	
31	38		20		4		0	1		15		28	
													Annual
Total	1100	946	831	518	219	38	0	2	48	290	616	877	5485

NATIONAL FUEL EXHIBIT CEH-2

Distribution PGC Statement No. 6

TESTIMONY OF
SHANNON L. PUTNAM
ON BEHALF OF
NATIONAL FUEL GAS DISTRIBUTION CORPORATION

PENNSYLVANIA PUBLIC UTILITY COMMISSION
v.
NATIONAL FUEL GAS DISTRIBUTION CORPORATION
(PURCHASED GAS COSTS -- 66 PA.C.S. SECTION 1307(f)),
DOCKET NO. R-2026-3059551

DIRECT TESTIMONY OF Shannon L. Putnam
PGC R-2026-3059551

Q. Please state your name and business address.

A. My name is Shannon Putnam, and my business address is 6363 Main Street, Williamsville, New York 14221.

Q. By whom are you employed and in what capacity?

A. I am employed by National Fuel Gas Distribution Corporation ("Distribution" or the "Company") as a Compliance and Project Analyst in the Rates and Regulatory Affairs Department.

Q. Please state briefly your educational and professional experience.

A. In 2020, I received a bachelor's degree in economics from Allegheny College. For 3 years prior to working at the Company, I worked for GEICO in their Management Development Program. I have worked for the Company within Rates & Regulatory Affairs department as a Utility Analyst since 2023.

Q. Have you previously testified before the Pennsylvania Public Utility Commission ("Commission")?

A. Yes. I have previously testified before the Commission in the Company's last 1307(f) proceeding

DIRECT TESTIMONY OF Shannon L. Putnam
PGC R-2026-3059551

under docket number R-2025-3052742.

Q. Have you previously testified before any other regulatory commissions?

A. No. I have not previously testified before any other regulatory commissions.

Q. What is the subject of your testimony?

A. I am testifying regarding PGC Exhibit Nos. 7-A, 10, 11, 14, 15, 16, 22, 25, 26-A, 27.

Q. Were these exhibits prepared by you or prepared under your supervision and direction?

A. Yes, they were.

Q. Is the content of these exhibits true and correct to the best of your knowledge, information, and belief?

A. Yes, it is.

Q. Please explain PGC Exhibit No. 7-A.

A. PGC Exhibit No. 7-A is Distribution's work product for the filing requirement at 52 Pa. Code §53.64 (c)(5), which requires that a list and update of any gas supply and demand projections be provided to the Commission for any purpose. Page 2 of PGC Exhibit No. 7-A provides a copy of Distribution's Form-IRP-

DIRECT TESTIMONY OF Shannon L. Putnam
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GAS-1A: Annual Gas Demand Requirements, which has been filed pursuant to 52 Pa. Code §59.81-84.

Q. Please explain PGC Exhibit No. 10.

A. PGC Exhibit No. 10 explains that Distribution maintains transportation agreements with its Daily Metered Transportation customers and Natural Gas Suppliers that provide Monthly Metered Transportation service to customers.

Q. Please explain PGC Exhibit No. 11.

A. PGC Exhibit No. 11 provides monthly transportation volumes by service classification (within the Daily Metered Transportation and Monthly Metered Transportation categories), average customer counts for the past twelve months ending November 2025, and a summary of current rates for transportation service. Daily Metered Transportation volumes, and customer counts by service class for Commercial, Industrial, and Public Authority, are provided on page 2. Page 3 provides Monthly Metered Transportation volumes, and customer counts by service class for Residential and Commercial. Page 4

provides Monthly Metered Transportation volumes, and customer counts by service class for Industrial and Public Authority. Pages 5 and 6 provide a summary of current transportation rates, extracted from Distribution's tariff.

Q. When did the portions of rates set forth in PGC Exhibit No. 11, that provide for recovery of purchased gas costs, become effective?

A. The portion of rates that provide for recovery of purchased gas costs, as provided in PGC Exhibit No. 11, became effective on November 1, 2025, in compliance with the Commission's Order issued on June 5, 2025. This Order was from Distribution's most recent annual gas cost proceeding, under Section 1307(f) of the Public Utility Code, at Docket No. R-2025-3052742. Under the procedure for quarterly updates of purchased gas costs, transportation rates may be adjusted quarterly (i.e., November, February, May, and August). The most recent filing was submitted on October 31, 2025, at Docket No. R-2025-3052742, with an

effective date of November 1, 2025.

Q. Briefly describe Distribution's system-wide choice plan.

A. Under the Natural Gas Choice and Competition Act ("Act"), each natural gas utility in the Commonwealth of Pennsylvania was required to submit a restructuring plan to the Commission by November 1, 1999. Distribution's system-wide choice plan under the Act was filed on October 1, 1999, at docket R-00994785. Even before then, Distribution offered choice to almost all customers, under a prior plan that became effective on March 4, 1999. Since then, Distribution's customers (except for one group described below), have been allowed to choose their own natural gas supplier for natural gas service. That gas supply is transported through natural gas delivery service that is provided by the Company. Only customers who elect to participate in the Customer Assistance Program ("CAP") program are not eligible to select a supplier other than Distribution. Effective July 15, 2010, Distribution

instituted a Purchase of Receivables ("POR") program for qualified natural gas suppliers on the Company's system.

The September 30, 2025, report filed with the Commission regarding the number and percentage of customers using alternative suppliers (i.e., NGDC Customer Switching Statistics) explains that 9.7% of residential customers, 27.0% of commercial customers, and 69.6% of industrial customers chose an alternative supplier. The percentage of load from alternative suppliers is 10.6% for the residential class, 76.6% for the commercial class, and 99.4% for the industrial class. In total, for the month of September 2025, 77.0% of the load is supplied by alternative suppliers.

Q. Please explain PGC Exhibit No. 14.

A. PGC Exhibit No. 14 is a schedule showing, for the most recent five years (i.e., November 2020 – October 2021 through November 2024 through October 2025), consecutive three-day peak throughput data (retail sales and end-user transportation service),

by customer class (residential, commercial, industrial, and public authority) for Distribution's Pennsylvania Division. It also shows the high, low, and average temperature for each consecutive three days. January 20, 2025 – January 22, 2025, is the most recent consecutive three-day peak. January 21, 2025, is the most recent peak day within that three-day period specified in PGC Exhibit No. 14.

Q. Please explain PGC Exhibit No. 15.

A. PGC Exhibit No. 15 identifies and supports Distribution's projected design peak day requirements for the twelve months ending September 30, 2027. Page 3 shows the projected peak day requirement. Data based on 74 heating degree days is provided because this level of degree days was used for peak day planning purposes, as further described in PGC Exhibit No. 24. Pages 4 through 12 establish the base case design peak day. For the heat sensitive classes (both retail sales and transportation service) such as residential, commercial, and public authority, Distribution utilizes a method of

extracting a base load volume and computing a daily heating volume for 74 heating degree days. The daily base load volume is added to the daily heating volume to determine the base case peak day sales. Gas usage of customers in the industrial classes, Small Volume Industrial Service ("SVIS"), Intermediate Volume Industrial Service ("IVIS"), Large Volume Industrial Service ("LVIS"), Large Industrial Service ("LIS"), and Daily Metered Large Manufacturing Transportation Service ("DMLMTS"), is computed based on an operating schedule. For the SVIS and IVIS classes, Distribution utilizes an operating schedule of 21 working days in a month to calculate peak day sales. For the LVIS, LIS and DMLMTS classes, Distribution utilizes customer operating schedules, as shown on Pages 11 and 12, to calculate peak day sales. Pages 13 and 15 show the residential model variables, pages 13 and 15 show the commercial model variables, pages 14, and 16 show the industrial model variables, and pages 14 and 16 show the public authority model variables used in the econometric models for each of the respective

revenue classes. Page 17 provides the number of extreme degree days based on a National Oceanic and Atmospheric Administration ("NOAA") calendar day (12am – 12am), including the mean temperature, for the most recent heating seasons over the previous 30 years.

Q. Please explain PGC Exhibit No. 16.

A. PGC Exhibit No. 16 reflects Distribution's gas requirements to provide reliable and uninterrupted service to its priority one customers (residential and firm critical commercial and public authority essential human needs customers) during peak periods. These requirements are calculated on both historic and projected bases.

Q. Please explain PGC Exhibit No. 22.

A. PGC Exhibit No. 22 is composed of four pages. Page 2 provides the historic levels of retail sales volumes in Mcf for Distribution's Pennsylvania Division for the twelve months ended November 30, 2025. Page 3 of PGC Exhibit No. 22 provides the projected levels of retail sales volumes in Mcf for Distribution's

DIRECT TESTIMONY OF Shannon L. Putnam
PGC R-2026-3059551

Pennsylvania Division for the eight months ending July 31, 2026. Page 4 provides the projected levels of retail sales volumes in Mcf for the Company's Pennsylvania Division for the twelve months ending July 31, 2027. The projected retail sales volume of 21,436,362 Mcf, provided on page 4 of PGC Exhibit No. 22, is the projected sales volume that is used as Factor "S" in the computation of purchased gas costs in PGC Exhibit 21.

Q. Please explain the methodology employed to project the levels of sales volumes contained in PGC Exhibit No. 22.

A. Distribution's forecasting methodology continues to be based on an econometric forecast as was presented in its most recent base rate proceeding, docket at R-2022-3035730, which was approved by a Commission issued Order on June 15,2023.

The residential, commercial and public authority classes have econometric models run for usage per account and number of accounts. Regressions for usage per account are run for each service class

within the revenue classes and have historical periods between five and seven years. Variables for these regressions can include monthly degree days, gas price, actual historical monthly usage and date. Account regressions are also run for each service class and can include variables of date and historical monthly accounts. Account regressions are run with historical periods between six and fifteen years.

The methodology for the company's large volume industrial customers also remains largely unchanged from R-2022-3035730. The only change being the expansion of the group to any customer with over 25,000 Mcf of yearly usage.

Q. Please explain PGC Exhibit No. 25.

A. PGC Exhibit No. 25 provides Distribution's NYMEX price for December 2025 through January 2028. This wellhead price projection is based on the New York Mercantile Exchange ("NYMEX") projection of natural gas prices at Henry Hub.

Q. Please explain PGC Exhibit No. 26-A.

DIRECT TESTIMONY OF Shannon L. Putnam
PGC R-2026-3059551

A. PGC Exhibit No. 26-A, page 2, provides Distribution's estimate of the 2026 design peak day requirements based on 74 heating degree days. The term "design peak day" refers to the practice that is standard in the natural gas industry under which pipeline capacity planning, storage capacity planning, and natural gas supply planning are based on customers' requirements on the coldest winter day reasonably expected to be experienced. An explanation of Distribution's design peak day requirements, including the requirements of transportation service customers, is provided in PGC Exhibit No. 15.

Q. Why were 74 heating degree days used in the calculation of design peak day requirements?

A. After a review of the coldest days experienced during several winter heating seasons across various portions of the Company's service territory, as well as a review of what design peak days other local distribution companies ("LDCs") prepare for, Distribution determined that the most appropriate

level of degree days for peak day planning in its service territory was 74 heating degree days. Distribution has had multiple days in the past 30 years where the territory has come within a few degrees of 74 heating degree days, based on a typical gas day (10am – 10am). In Distribution's 2000 1307(f) proceeding, the Commission concluded that this was a reasonable level of heating degree days to use for system planning purposes.

> "Upon our careful review of the recommendation of the ALJ and the position of the Parties, we find that the ALJ's recommendation of approval of NFGD's proposal to use 74 heating degree days for purposes of both planning the necessary levels of pipeline and storage capacity on interstate pipeline companies and for allocating costs of capacity among classes of customers is reasonable." (Opinion and Order, R-994898, Adopted: August 17, 2000, pg. 17.)

Q. Please explain PGC Exhibit No. 27.

A. PGC Exhibit No. 27 shows historical levels of Unaccounted for Gas (UFG).

The Company considers multiples of twelve-month periods ending in August to be the proper periods in which to measure UFG. Twelve-month periods ending

in August represent periods in which receipts and deliveries are least affected by weather, thus providing the most representative UFG information. Page 2 shows the Company's actual, historical level of UFG for the sixty months ended August 2021, 2022, 2023, 2024 and 2025. Page 3 provides the monthly UFG levels for September 2020 – August 2025. The Gas Received Total (Column 4) includes Gas Received From Production Facilities (Column 1), Gas Received From Interstate Pipelines (Column 2), and Gas Received From Other Sources (Column 3). The Gas Delivered Total (Column 7) includes Gas Delivered To Customers (Column 5) and Gas Delivered To Interstate Pipeline (Column 6). The Adjustments Total (Column 10) includes Located & Repaired Breaks in Mains/Services (Column 8) and Company Use (Column 9). Distribution UFG (Column 11) is calculated as follows: Gas Received Total (Column 4) less Gas Delivered Total (Column 7) less Adjustments Total (Column 10). The twelve-month percent of UFG shown in Column 13 equals the sum of twelve months of

Column 11 divided by the sum of twelve months of Column 4.

Q. How has the Company addressed UFG?

A. It is important to note that the actual volume of gas that is physically "unaccounted-for" is not substantial. Most UFG is the difference between gas metered going into the system and gas metered at customer premises. Meters measuring gas going into the system and meters measuring gas at customer premises have error tolerances. The Company continually strives to improve the measurement of UFG. For example, temperature compensated meters have been installed during meter change outs. Temperature compensated meters record gas usage more accurately than non-temperature compensated meters. Most UFG remedies provide only for better "accounting" of the differential between receipts and deliveries. This type of activity, although "reducing" UFG, does not change the amount of gas being brought into the system. Leak repair is a UFG element that reduces gas purchases without changing

gas deliveries. Leak repair physically reduces UFG. Consequently, field priorities require the repair of all higher volume leaks, regardless of leak safety classification. Finally, UFG due to leakage has been added as a factor with significant weighting in the Company's pipeline replacement evaluation program ("PREP").

Q. What is the current retainage rate charged to transportation customers?

A. As indicated in the Company's tariff, to compensate for line losses, the volume of gas delivered into the Company's distribution system for daily and monthly metered transportation service shall be determined to be equal to 99.85 percent of the amount indicated by a meter at the point of delivery into the Company's distribution system or a 0.15 percent retainage rate. The retainage rate of 0.15 percent includes 0.13 percent for UFG and 0.02 percent for Company use.

Q. Is the Company proposing any changes to the retainage rate in this proceeding?

A. No, the Company is proposing to keep the currently effective retainage rate of 0.15 percent in place for all customer classes.

Q. Does this conclude your direct testimony at this time?

A. Yes, it does.

Verification

I, *Shannon L. Putnam*, Utility Analyst, of the Rates and Regulatory Affairs Department of National Fuel Gas Distribution Corporation state that the facts set forth in the foregoing Purchased Gas Cost Filing under Section 1307(f) of the Public Utility Code and 52 Pa. Code §§ 53.64 and 53.65 Docketed at R-2026-3059551 including:

Distribution PGC Statement No. 6 - Direct Testimony of Shannon L. Putnam
Exhibit Nos. 7-A, 10, 11, 14, 15, 16, 22, 25, 26-A, and 27

are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. This statement is made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsifications to authorities.

Shannon L. Putnam

Shannon L. Putnam

This 30th day of January, 2026

NATIONAL FUEL EXHIBIT CEH-3

National Fuel Gas Distribution Corporation - Pennsylvania Division
2026 Long-Range Requirements
Fiscal Years 2026 – 2030

Profile

The Pennsylvania Division of National Fuel Gas Distribution Corporation (National Fuel or the Company), is a gas only public utility, which provides service in counties located in Western Pennsylvania. The service area covers the counties of Armstrong, Butler, Erie, Crawford, Mercer, Venango, Clarion, Forest, Warren, McKean, Elk, Jefferson, Clearfield, and Cameron County including but not limited to the cities and townships of Erie, Clarion, Franklin, Meadville, Mercer, Millcreek, Oil City, Smethport, and Warren.

Forecast Methodology

For forecasting purposes, the Company segments its market into the following classes: residential, commercial, industrial, and public authority. The commercial, industrial, and public authority classes are further segmented into small and large volume categories using a throughput threshold of 25,000 Mcf/year. The residential classes are segmented into two categories: 1) a typical residential home, and 2) a non-typical residential home like those used as a small business.

The residential and the small volume categories for commercial, industrial, and public authority classes are segregated into two forecasts: usage per account and number of accounts. To establish the appropriate length of historical data for each forecast (usage per account, number of accounts), regression analyses are performed across all revenue classes (residential, commercial, industrial, and public authority). These are conducted for historical periods ranging from 5 to 15 years, in one-year increments. For each combination of forecast type and revenue class, the timeframe associated with the highest R-squared value is selected as the historical period for the forecast.

The usage per account forecast is determined using econometric models, which describe average annual usage as a function of one or more econometric variables. When a usage per account forecast does not produce a statistically significant result in the regression – defined as producing an R Square of at least 0.97 – an average of past monthly values is used instead. The forecasted number of accounts is determined using the Forecast.ETS function, which describe the number of accounts as a function of time and seasonality. When a forecasting group has less than 25 accounts, the forecasted number of accounts is held steady at the last reported figure. Projected throughput for each of the classes is the product of monthly usage per account and the number of accounts.

The large volume commercial, large volume industrial, and large volume public authority classes (greater than 25,000 Mcf/year) consist of 97 customers for the 2026 rate case estimate. The largest customers within this group are contacted by the appropriate major account representatives of the Company's Energy Services Department ("Energy Services") to determine their monthly and annual usage, on a throughput basis, over a six-year horizon. The large volume customers are asked to estimate their monthly and annual usage, paying particular attention to any events that may alter their estimated future consumption levels. Customers with usage over 25,000 Mcf/year who do not respond to the request or are not contacted have their monthly usage forecasted based on their

historical consumptions and the Company's last communications with the customer. The large volume forecasting process includes an assessment of significant load changes, which is based on input and data provided to the Company's Rates and Regulatory Affairs Department, by both the Company's Engineering Services and Energy Services Departments.

A summarization of the aforementioned forecast methodology by customer category is shown below:

Residential – Typical Residential Home

Segregated between usage/account and number of accounts. Usage/account is based upon a regression analysis for the whole revenue class for a 7-year time period (January 2018 – December 2024). The regression output is then allocated to each summarized tariff service class based on the spread of the most recently completed fiscal year. Number of accounts is based upon the Forecast.ETS function for a time period of 14 years (January 2011 – December 2024) and is then allocated through the same process as usage/account. Data includes both retail and transportation (throughput and accounts) in order to maintain an intact data stream.

Usage Per Account

Dependent Variable: **Residential Gas Throughput (Mcf/Account)**

Independent Variables:
Constant (intercept of the regression), **Monthly Degree Days** (Actuals), **Monthly Real Residential Gas Price** (lagged 12 periods), and **Historical Monthly Gas Usage** (Actuals).

Number of Accounts

Dependent Variable: **Residential Number of Accounts**

Independent Variables:
Constant (intercept of the regression), **Trend (Linear with Seasonality and Exponential Smoothing), and Historical Monthly Accounts**

Residential – Non-Typical Residential

Segregated between usage/account and number of accounts. Usage/account is based upon a regression analysis by summarized tariff class for 6 years (January 2019 - December 2024). Number of accounts is based upon the Forecast.ETS function for 15 years (January 2010 – December 2024). Data includes both retail and transportation (throughput and accounts) in order to maintain an intact data stream.

Usage Per Account

Dependent Variable: **Residential Gas Throughput (Mcf/Account)**

Independent Variables:
Constant (intercept of the regression), **Monthly Degree Days** (actuals), **Historical Monthly Gas Usage** (actuals)**, and Trend** (Linear with Seasonality and Exponential Smoothing).

Number of Accounts

Dependent Variable: **Residential Number of Accounts**

Independent Variables:
Constant (intercept of the regression), **Trend (Linear with Seasonality and Exponential Smoothing), and Historical Monthly Accounts**

Commercial (Customers <25,000 Mcf/year)

Segregated between usage/account and number of accounts. Usage/account is based upon regression analyses by summarized tariff class for the 6 years (January 2019 – December 2024), with the exception of Commercial Res MMT, which was reduced to a 5-year average due to volatility of data prior to 2020. Number of accounts is based upon the Forecast.ETS function for 8 years (January 2017 – December 2024). Data includes both retail and transportation (throughput and accounts) in order to maintain an intact data stream.

Usage Per Account

Dependent Variable**: Commercial Gas Throughput (Mcf/Account)**

Independent Variables:
Constant (intercept of the regression), **Monthly Degree Days** (actuals), **Historical Monthly Gas Usage** (actuals), **Trend** (Linear with Seasonality and Exponential Smoothing).

Number of Accounts

Dependent Variable: **Commercial Number of Accounts**

Independent Variables:
Constant (intercept of the regression), **Trend (Linear with Seasonality and Exponential Smoothing), and Historical Monthly Accounts**

Industrial (Customers <25,000 Mcf/year)

Segregated between usage/account and number of accounts. Usage/account is based upon regression analyses by summarized tariff class for the periods of 8 years (January 2017 – December 2024). Number of accounts is based upon the Forecast.ETS function for 3 years (January 2022 – December 2024). Data includes both retail and transportation (throughput and accounts) in order to maintain an intact data stream.

Usage Per Account

Dependent Variable: **Small Industrial Gas Throughput (Mcf/Account)**

Independent Variables:
Constant (intercept of the regression), **Trend** (Linear with Seasonality and Exponential Smoothing)**, and Historical Monthly Accounts**

Number of Accounts

Dependent Variable: **Small Industrial Number of Accounts**

Independent Variables:
Constant (intercept of the regression), **Trend** (Linear with Seasonality and Exponential Smoothing)**, and Historical Monthly Accounts**

Public Authority (Customers <25,000 Mcf/year)

Segregated between usage/account and number of accounts. Usage/account is based upon a regression analysis by summarized tariff class for the period of 6 years (January 2019 - December 2024). Number of accounts is based upon the Forecast.ETS function for 3 years (January 2022 – December 2024). Data includes both retail and transportation (throughput) in order to maintain an intact data stream.

Usage Per Account

Dependent Variable: **Public Authority Gas Throughput (Mcf/Account)**

Independent Variables:
Constant (intercept of the regression), **Monthly Degree Days** (Actuals), **Monthly Real Public Authority Gas Price** (lagged 12 periods), **Heating Season** (binary variable) and **Historical Monthly Gas Usage** (Actuals).

Number of Accounts

Dependent Variable: **Public Authority Number of Accounts**

Independent Variables:
Constant (intercept of the regression), **Trend (Linear with Seasonality and Exponential Smoothing), and Historical Monthly Accounts**

Large Volume Commercial Customers (>25,000 Mcf/year)

The large volume commercial customers consist of 18 customers who are forecasted through a joint effort between the Energy Services Department account representatives, the Rates and Regulatory Affairs' Market Planning group, and the individual customers via usage surveys and historical consumption data.

Large Volume Industrial Customers (>25,000 Mcf/year)

The large volume industrial customers consist of 76 customers who are forecasted through a joint effort between the Energy Services Department account representatives, the Rates and Regulatory Affairs' Market Planning group, and the individual customers via usage surveys and historical consumption data.

Large Volume Public Authority Customers (>25,000 Mcf/year)

The large volume public authority customers consist of 3 customers who are forecasted through a joint effort between the Energy Services Department account representatives, the Rates and Regulatory Affairs' Market Planning group, and the individual customers via usage surveys and historical consumption data.

Company Use

Actual volumes, based on the twelve months ended September 2024.

Unaccounted For (retail and transportation service)

0.15% of total throughput – LAUF target in National Fuel's System Performance Adjustment Mechanism (SPAM).

Capacity Planning Peak Day Requirements

For Residential, Commercial, and Public Authority customers, Peak Day consumption is forecasted by first calculating the average single-day heat load for January and then extrapolating it to the required heating degree days (HDDs).

The January heat load is determined by subtracting the base load – defined as the average monthly consumption of the two lowest-use months, which is typically July and August – from January's total consumption. This adjusted figure is then divided by the forecasted number of January HDDs to establish the January heat per degree day factor. To estimate the Peak Day heat load, the factor is multiplied by the peak HDDs, which is set at 74. Finally, the single-day base load estimate is added back to the heat load to arrive at the total Peak Day consumption requirement.

For Industrial customers, consumption is not considered heat-sensitive, so the methodology differs. Peak Day consumption is calculated by dividing January's total consumption by the average number of operational days in the month. Customers operating seven days per week use 31 as the divisor, while those operating five days per week use 21. This approach ensures that Industrial forecasted consumption remains consistent and does not increase during a Peak Day.

The Company's method for forecasting Peak Day usage is detailed in 1307(f) (Docket No. R-2026-3059551), within the direct testimony of Shannon Putnam, detailed in Exhibit CEH-2.

NATIONAL FUEL EXHIBIT CEH-4

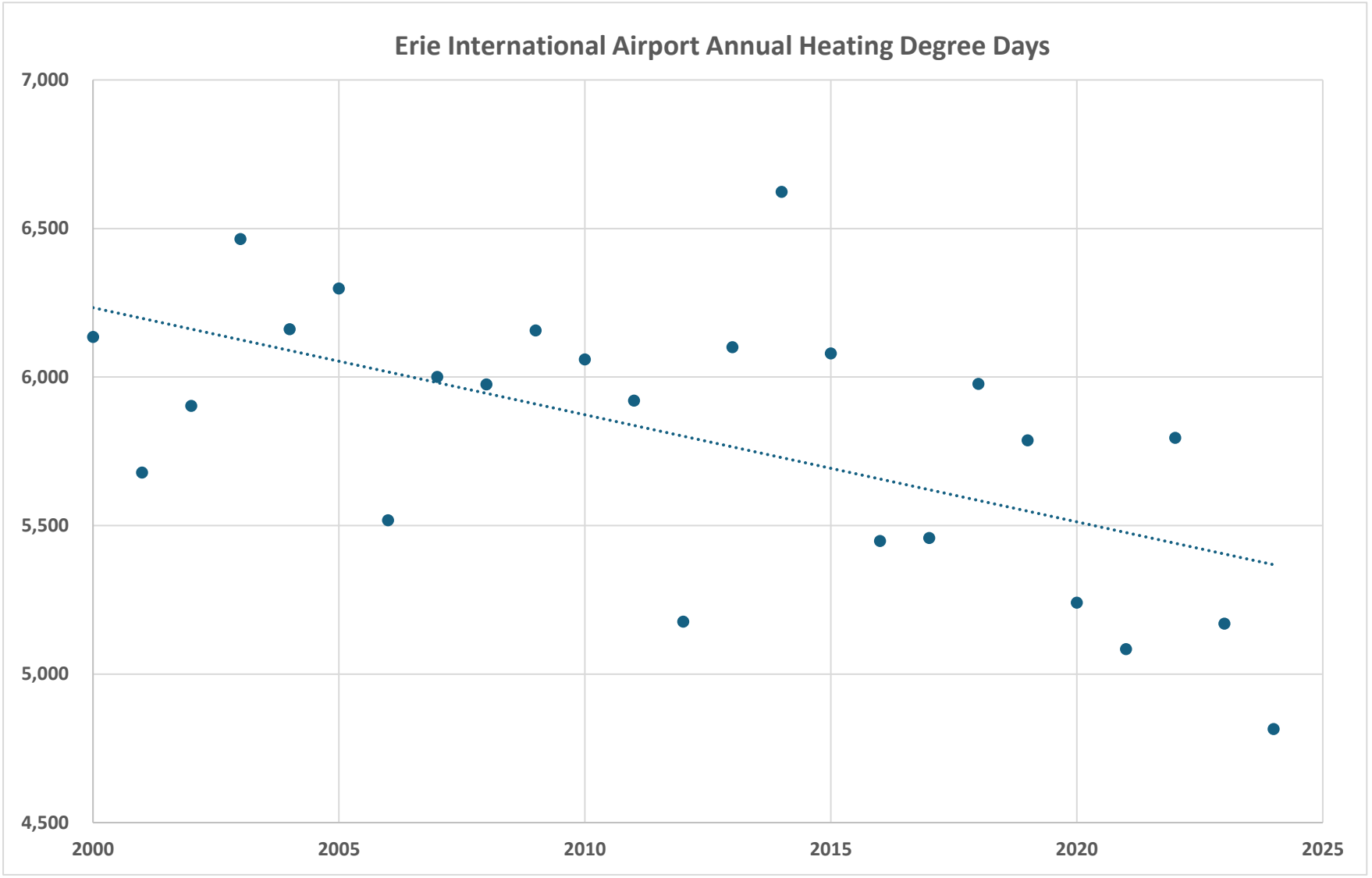
National Fuel Gas Distribution Corporation | **Gas Requirements**
Pennsylvania Division | **2026RC**
Projected Number of Accounts
Rev Mth Accts | **FTY Forecast - Accounts**

Total Requirements	October 2025	November 2025	December 2025	January 2026	February 2026	March 2026	April 2026	May 2026	June 2026	July 2026	August 2026	September 2026	Average
Residential Retail Sales	179,181	179,464	180,773	181,487	181,829	181,985	181,762	181,189	180,358	179,642	178,924	178,608	180,434
Residential MMT Transportation	523	525	530	531	533	532	534	534	537	575	575	573	542
Residential SATC Transportation	16,373	16,254	16,215	16,263	16,259	16,328	16,377	16,573	16,740	16,837	17,023	17,108	16,529
Residential DMT Transportation	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Residential Number of Accounts	196,077	196,243	197,518	198,281	198,620	198,845	198,673	198,296	197,635	197,054	196,521	196,289	197,505
Commercial Retail Sales	10,994	11,108	11,277	11,383	11,426	11,411	11,397	11,355	11,252	11,156	11,097	11,084	11,245
Commercial MMT Transportation	2,870	2,877	2,890	2,904	2,906	2,899	2,917	2,925	2,926	2,927	2,947	2,952	2,911
Commercial SATC Transportation	1,015	1,019	1,009	991	978	953	952	948	942	942	938	936	969
Commercial DMT Transportation	11	11	11	11	11	11	11	11	11	11	11	11	11
Total Commercial Number of Accounts	14,890	15,015	15,187	15,289	15,321	15,274	15,277	15,239	15,131	15,036	14,993	14,983	15,136
Industrial Retail Sales	183	182	182	182	183	183	184	183	178	184	180	180	182
Industrial MMT Transportation	337	337	345	345	344	345	341	342	345	336	338	338	341
Industrial SATC Transportation	14	14	14	14	14	14	14	14	14	14	14	14	14
Industrial DMT Transportation	62	62	62	62	62	62	62	62	62	62	62	62	62
Total Industrial Number of Accounts	596	595	603	603	603	604	601	601	599	596	594	594	599
Public Authority Retail Sales	542	542	565	558	532	532	533	534	525	537	520	509	535
Public Authority MMT Transportation	612	613	599	604	631	631	629	630	638	625	642	650	626
Public Authority SATC Transportation	44	44	44	44	44	44	44	44	44	44	44	44	44
Public Authority DMT Transportation	3	3	3	3	3	3	3	3	3	3	3	3	3
Total Public Authority Number of Accounts	1,201	1,202	1,211	1,209	1,210	1,210	1,209	1,211	1,210	1,209	1,209	1,206	1,208
Subtotal Number of Accounts	212,764	213,055	214,519	215,382	215,754	215,933	215,760	215,347	214,575	213,895	213,317	213,072	214,448
Company Use	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Number of Accounts	212,764	213,055	214,519	215,382	215,754	215,933	215,760	215,347	214,575	213,895	213,317	213,072	214,448

National Fuel Gas Distribution Corporation | **Gas Requirements**
Pennsylvania Division | **2026RC**
Projected Number of Accounts
Rev Mth Accts | **FPFTY Forecast - Accounts**

Total Requirements	November 2026	December 2026	January 2027	February 2027	March 2027	April 2027	May 2027	June 2027	July 2027	August 2027	September 2027	October 2027	Average
Residential Retail Sales	179,764	181,075	181,788	182,129	182,286	182,063	181,489	180,659	179,943	179,223	178,907	179,781	180,759
Residential MMT Transportation	529	532	533	534	534	536	536	539	577	576	575	528	544
Residential SATC Transportation	16,281	16,242	16,290	16,286	16,355	16,404	16,600	16,768	16,865	17,051	17,137	16,428	16,559
Residential DMT Transportation	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Residential Number of Accounts	196,574	197,848	198,611	198,949	199,175	199,003	198,625	197,965	197,384	196,851	196,619	196,737	197,862
Commercial Retail Sales	11,209	11,377	11,482	11,524	11,511	11,498	11,455	11,353	11,255	11,198	11,184	11,194	11,353
Commercial MMT Transportation	2,960	2,973	2,987	2,990	2,983	3,000	3,008	3,010	3,011	3,029	3,037	3,037	3,002
Commercial SATC Transportation	927	917	900	886	861	860	856	850	851	846	845	832	869
Commercial DMT Transportation	11	11	11	11	11	11	11	11	11	11	11	11	11
Total Commercial Number of Accounts	15,107	15,278	15,380	15,411	15,366	15,369	15,330	15,224	15,128	15,084	15,077	15,074	15,236
Industrial Retail Sales	182	182	182	185	185	184	183	179	184	181	180	183	183
Industrial MMT Transportation	338	347	347	346	347	343	343	347	338	339	339	341	343
Industrial SATC Transportation	14	14	14	14	14	14	14	14	14	14	14	14	14
Industrial DMT Transportation	62	62	62	62	62	62	62	62	62	62	62	62	62
Total Industrial Number of Accounts	596	605	605	607	608	603	602	602	598	596	595	600	601
Public Authority Retail Sales	509	531	525	499	498	500	500	492	503	487	476	476	500
Public Authority MMT Transportation	651	636	642	668	669	667	667	675	662	679	687	687	666
Public Authority SATC Transportation	44	44	44	44	44	44	44	44	44	44	44	44	44
Public Authority DMT Transportation	3	3	3	3	3	3	3	3	3	3	3	3	3
Total Public Authority Number of Accounts	1,207	1,214	1,214	1,214	1,214	1,214	1,214	1,214	1,212	1,213	1,210	1,210	1,213
Subtotal Number of Accounts	213,484	214,945	215,810	216,181	216,363	216,189	215,771	215,005	214,322	213,744	213,501	213,621	214,911
Company Use	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Number of Accounts	213,484	214,945	215,810	216,181	216,363	216,189	215,771	215,005	214,322	213,744	213,501	213,621	214,911

NATIONAL FUEL EXHIBIT CEH-5


Erie International Airport Annual Heating Degree Days
7,000
6,500
6,000
5,500
5,000
4,500
2000
2005
2010
2015
2020
2025

NATIONAL FUEL EXHIBIT CEH-6

Month	Actual HDD	10 Year HDD (2015-2024)	Difference	NOAA 15-Year HDD (2006-2020)	Difference
1/1/2006	847	1100	253	1116	269
2/1/2006	961	946	-15	1022	61
3/1/2006	897	831	-66	885	-12
4/1/2006	497	518	21	528	31
5/1/2006	261	219	-42	210	-51
6/1/2006	54	38	-16	38	-16
7/1/2006	1	0	-1	4	3
8/1/2006	3	2	-1	6	3
9/1/2006	119	48	-71	68	-51
10/1/2006	466	290	-176	328	-138
11/1/2006	587	616	29	638	51
12/1/2006	825	877	52	928	103
1/1/2007	1023	1100	77	1116	93
2/1/2007	1287	946	-341	1022	-265
3/1/2007	842	831	-11	885	43
4/1/2007	627	518	-109	528	-99
5/1/2007	231	219	-12	210	-21
6/1/2007	42	38	-4	38	-4
7/1/2007	10	0	-10	4	-6
8/1/2007	11	2	-9	6	-5
9/1/2007	56	48	-8	68	12
10/1/2007	190	290	100	328	138
11/1/2007	690	616	-74	638	-52
12/1/2007	991	877	-114	928	-63
1/1/2008	1019	1100	81	1116	97
2/1/2008	1088	946	-142	1022	-66
3/1/2008	997	831	-166	885	-112
4/1/2008	417	518	101	528	111
5/1/2008	323	219	-104	210	-113
6/1/2008	22	38	16	38	16
7/1/2008	1	0	-1	4	3
8/1/2008	4	2	-2	6	2
9/1/2008	37	48	11	68	31
10/1/2008	388	290	-98	328	-60
11/1/2008	677	616	-61	638	-39
12/1/2008	1002	877	-125	928	-74
1/1/2009	1341	1100	-241	1116	-225
2/1/2009	961	946	-15	1022	61
3/1/2009	874	831	-43	885	11
4/1/2009	513	518	5	528	15
5/1/2009	239	219	-20	210	-29
6/1/2009	69	38	-31	38	-31
7/1/2009	17	0	-17	4	-13
8/1/2009	12	2	-10	6	-6
9/1/2009	83	48	-35	68	-15
10/1/2009	444	290	-154	328	-116
11/1/2009	556	616	60	638	82
12/1/2009	1048	877	-171	928	-120
1/1/2010	1223	1100	-123	1116	-107
2/1/2010	1108	946	-162	1022	-86
3/1/2010	832	831	-1	885	53
4/1/2010	399	518	119	528	129
5/1/2010	205	219	14	210	5
6/1/2010	27	38	11	38	11
7/1/2010	8	0	-8	4	-4
8/1/2010	2	2	0	6	4
9/1/2010	95	48	-47	68	-27
10/1/2010	361	290	-71	328	-33
11/1/2010	654	616	-38	638	-16
12/1/2010	1145	877	-268	928	-217
1/1/2011	1295	1100	-195	1116	-179
2/1/2011	1051	946	-105	1022	-29
3/1/2011	966	831	-135	885	-81
4/1/2011	542	518	-24	528	-14
5/1/2011	235	219	-16	210	-25
6/1/2011	37	38	1	38	1
7/1/2011	0	0	0	4	4
8/1/2011	1	2	1	6	5
9/1/2011	72	48	-24	68	-4
10/1/2011	371	290	-81	328	-43
11/1/2011	509	616	107	638	129
12/1/2011	841	877	36	928	87
1/1/2012	1014	1100	86	1116	102
2/1/2012	890	946	56	1022	132
3/1/2012	499	831	332	885	386
4/1/2012	578	518	-60	528	-50
5/1/2012	130	219	89	210	80
6/1/2012	43	38	-5	38	-5
7/1/2012	0	0	0	4	4
8/1/2012	3	2	-1	6	3
9/1/2012	121	48	-73	68	-53
10/1/2012	346	290	-56	328	-18
11/1/2012	732	616	-116	638	-94
12/1/2012	820	877	57	928	108
1/1/2013	1018	1100	82	1116	98
2/1/2013	1054	946	-108	1022	-32

Colder than Actual HDDs
Warmer than Actual HDDs

	Standard Deviation	
	10 Year (2015-2024)	15 Year (2006-2020)
Last 3	78.99035002	86.01045987
Last 5	78.47640473	86.67101735
Last 10	87.13465139	92.04979079
Last 15	103.8407635	104.9778038

3/1/2013	995	831	-164	885	-110
4/1/2013	538	518	-20	528	-10
5/1/2013	185	219	34	210	25
6/1/2013	68	38	-30	38	-30
7/1/2013	3	0	-3	4	1
8/1/2013	9	2	-7	6	-3
9/1/2013	120	48	-72	68	-52
10/1/2013	312	290	-22	328	16
11/1/2013	755	616	-139	638	-117
12/1/2013	1043	877	-166	928	-115
1/1/2014	1339	1100	-239	1116	-223
2/1/2014	1240	946	-294	1022	-218
3/1/2014	1139	831	-308	885	-254
4/1/2014	530	518	-12	528	-2
5/1/2014	237	219	-18	210	-27
6/1/2014	30	38	8	38	8
7/1/2014	5	0	-5	4	-1
8/1/2014	13	2	-11	6	-7
9/1/2014	99	48	-51	68	-31
10/1/2014	330	290	-40	328	-2
11/1/2014	768	616	-152	638	-130
12/1/2014	893	877	-16	928	35
1/1/2015	1323	1100	-223	1116	-207
2/1/2015	1446	946	-500	1022	-424
3/1/2015	1046	831	-215	885	-161
4/1/2015	530	518	-12	528	-2
5/1/2015	162	219	57	210	48
6/1/2015	37	38	1	38	1
7/1/2015	12	0	-12	4	-8
8/1/2015	6	2	-4	6	0
9/1/2015	33	48	15	68	35
10/1/2015	336	290	-46	328	-8
11/1/2015	504	616	112	638	134
12/1/2015	644	877	233	928	284
1/1/2016	1119	1100	-19	1116	-3
2/1/2016	944	946	2	1022	78
3/1/2016	676	831	155	885	209
4/1/2016	627	518	-109	528	-99
5/1/2016	269	219	-50	210	-59
6/1/2016	40	38	-2	38	-2
7/1/2016	0	0	0	4	4
8/1/2016	0	2	2	6	6
9/1/2016	23	48	25	68	45
10/1/2016	253	290	37	328	75
11/1/2016	504	616	112	638	134
12/1/2016	993	877	-116	928	-65
1/1/2017	978	1100	122	1116	138
2/1/2017	753	946	193	1022	269
3/1/2017	896	831	-65	885	-11
4/1/2017	380	518	138	528	148
5/1/2017	277	219	-58	210	-67
6/1/2017	48	38	-10	38	-10
7/1/2017	0	0	0	4	4
8/1/2017	10	2	-8	6	-4
9/1/2017	87	48	-39	68	-19
10/1/2017	234	290	56	328	94
11/1/2017	666	616	-50	638	-28
12/1/2017	1129	877	-252	928	-201
1/1/2018	1205	1100	-105	1116	-89
2/1/2018	847	946	99	1022	175
3/1/2018	1023	831	-192	885	-138
4/1/2018	700	518	-182	528	-172
5/1/2018	103	219	116	210	107
6/1/2018	22	38	16	38	16
7/1/2018	0	0	0	4	4
8/1/2018	0	2	2	6	6
9/1/2018	47	48	1	68	21
10/1/2018	359	290	-69	328	-31
11/1/2018	797	616	-181	638	-159
12/1/2018	874	877	3	928	54
1/1/2019	1176	1100	-76	1116	-60
2/1/2019	953	946	-7	1022	69
3/1/2019	967	831	-136	885	-82
4/1/2019	505	518	13	528	23
5/1/2019	230	219	-11	210	-20
6/1/2019	38	38	0	38	0
7/1/2019	0	0	0	4	4
8/1/2019	1	2	1	6	5
9/1/2019	11	48	37	68	57
10/1/2019	261	290	29	328	67
11/1/2019	778	616	-162	638	-140
12/1/2019	867	877	10	928	61
1/1/2020	919	1100	181	1116	197
2/1/2020	956	946	-10	1022	66
3/1/2020	680	831	151	885	205
4/1/2020	591	518	-73	528	-63
5/1/2020	298	219	-79	210	-88
6/1/2020	31	38	7	38	7
7/1/2020	0	0	0	4	4

8/1/2020	0	2	2	6	6
9/1/2020	68	48	-20	68	0
10/1/2020	323	290	-33	328	5
11/1/2020	470	616	146	638	168
12/1/2020	904	877	-27	928	24
1/1/2021	1021	1100	79	1116	95
2/1/2021	1057	946	-111	1022	-35
3/1/2021	672	831	159	885	213
4/1/2021	455	518	63	528	73
5/1/2021	270	219	-51	210	-60
6/1/2021	16	38	22	38	22
7/1/2021	0	0	0	4	4
8/1/2021	0	2	2	6	6
9/1/2021	33	48	15	68	35
10/1/2021	175	290	115	328	153
11/1/2021	654	616	-38	638	-16
12/1/2021	731	877	146	928	197
1/1/2022	1265	1100	-165	1116	-149
2/1/2022	946	946	0	1022	76
3/1/2022	762	831	69	885	123
4/1/2022	529	518	-11	528	-1
5/1/2022	179	219	40	210	31
6/1/2022	33	38	5	38	5
7/1/2022	0	0	0	4	4
8/1/2022	0	2	2	6	6
9/1/2022	94	48	-46	68	-26
10/1/2022	393	290	-103	328	-65
11/1/2022	618	616	-2	638	20
12/1/2022	976	877	-99	928	-48
1/1/2023	942	1100	158	1116	174
2/1/2023	826	946	120	1022	196
3/1/2023	877	831	-46	885	8
4/1/2023	453	518	65	528	75
5/1/2023	285	219	-66	210	-75
6/1/2023	64	38	-26	38	-26
7/1/2023	0	0	0	4	4
8/1/2023	8	2	-6	6	-2
9/1/2023	51	48	-3	68	17
10/1/2023	293	290	-3	328	35
11/1/2023	648	616	-32	638	-10
12/1/2023	723	877	154	928	205
1/1/2024	1051	1100	49	1116	65
2/1/2024	827	946	119	1022	195
3/1/2024	698	831	133	885	187
4/1/2024	393	518	125	528	135
5/1/2024	102	219	117	210	108
6/1/2024	24	38	14	38	14
7/1/2024	0	0	0	4	4
8/1/2024	6	2	-4	6	0
9/1/2024	17	48	31	68	51
10/1/2024	258	290	32	328	70
11/1/2024	508	616	108	638	130
12/1/2024	931	877	-54	928	-3
1/1/2025	1243	1100	-143	1116	-127
2/1/2025	1057	946	-111	1022	-35
3/1/2025	717	831	114	885	168
4/1/2025	501	518	17	528	27
5/1/2025	286	219	-67	210	-76
6/1/2025	26	38	12	38	12
7/1/2025	0	0	0	4	4
8/1/2025	30	2	-28	6	-24
9/1/2025	40	48	8	68	28

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 13-R

Rebuttal Testimony of Cathryn E. Hilliard

Topics Addressed: Test Year Sales Volumes and Accounts

Dated: May 12, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Cathryn E. Hilliard. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. Did you previously submit testimony in this proceeding on behalf of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company")?

A. Yes. I submitted my direct testimony, National Fuel Statement No. 13, on January 28, 2026.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your rebuttal testimony.

A. The purpose of this rebuttal is to respond to the statement in the Office of Consumer Advocate ("OCA") Statement No. 1, the direct testimony of Michael Deupree, that it is "questionable" whether using Average Heating Degree Days ("AHDDs") for Erie, Pennsylvania is representative of weather conditions across the Company's entire Pennsylvania service territory for purposes of the Weather Normalization Adjustment. This rebuttal will also address the recommendation in Michael Deupree's testimony that October and May should be excluded from the WNA period.

Q. Are you sponsoring any exhibits with your rebuttal testimony?

A. Yes. I am sponsoring National Fuel Exhibit CEH – 1R, which addresses the former assertion by evaluating the representativeness of the Erie, Pennsylvania heating degree

days ("HDDs") using customer data and a weighted analysis of NOAA HDDs, and National Fuel Exhibit CEH – 2R, which is a regression analysis assessing the statistical significance of HDDs on heat load per account for May and October for impacted service classes.

III. WEATHER NORMALIZATION ADJUSTMENT

Q. Do you agree with Mr. Deupree that the Erie, Pennsylvania NOAA weather station may not be representative of weather conditions for the Company's full Pennsylvania service territory?

A. No, I do not. For purposes of the Company's Weather Normalization Adjustment ("WNA"), the relevant question is not whether a single weather station exactly replicates weather conditions in every portion of a geographically diverse service territory. Instead, the appropriate question is whether the selected station provides a reasonable and objective proxy for the aggregate weather conditions experienced by customers, such that the WNA fairly normalizes revenues for weather driven sales volatility, avoids systematic over-recovery or under-recovery, and can be administered consistently and transparently over time.

It is important to note that while the Company's Pennsylvania service territory spans a wide geographic area, customers are not evenly distributed across it. As shown in National Fuel Exhibit CEH-1R, Table 1, the Erie Service Center alone represents approximately 35 percent of total residential customers in the Company's Pennsylvania service territory. This makes it the single largest concentration of customers within the

Company's Pennsylvania operations. No other individual service center represents a comparable share.

To directly test the OCA's claim regarding representativeness, the Company used this mapping to compare Erie, PA to a customer-weighted average HDD index. The first step of this involved mapping customer groups to the closest NOAA weather stations. As shown in National Fuel Exhibit CEH – 1R, Table 2, when customers are grouped based on the weather stations used in the analysis, the Erie station represents approximately 44 percent of total residential customers. Other stations represent substantially smaller portions of the customer base. This result is important because a station associated with the largest share of customers will, by definition, have the greatest influence on the customer-weighted experience of weather. Accordingly, Erie HDDs are inherently aligned with the weather exposure of a significant portion of the Company's customers. Furthermore, nearly 60 percent of residential customers are represented by the Erie and Youngstown stations, both of which have very similar HDD profiles as shown in National Fuel Exhibit CEH – 1R, Table 3.

As National Fuel Exhibit CEH – 1R, Table 4 shows, over the years analyzed, annual customer-weighted HDD totals differ from Erie HDD totals by only a few percentage points. These results demonstrate that Erie HDDs are consistent with the broader customer experience.

In addition to representativeness, it is important to consider whether a weather station is reliable and administrable, particularly when it directly affects customer charges.

As shown in National Fuel Exhibit CEH-1R, Table 5, the Erie NOAA station provides a complete, uninterrupted record across the period reviewed, with no missing months of data. By contrast, several alternative stations included in the multi-station analysis contain missing data, indicated by missing monthly observations.

National Fuel Exhibit CEH-1R, Table 5 identifies numerous missing months of data among the smaller stations, including substantial gaps at certain locations. Many of these missing observations occur during the October through May WNA period, when heating degree days directly influence WNA adjustments. Stations with incomplete data introduce additional uncertainty and require assumptions or estimation methods to fill gaps. Such practices reduce transparency, complicate administration, and increase the potential for disputes, all of which can undermine affordability and customer confidence. The Erie station's complete data record avoids these issues and supports consistent and replicable WNA calculations.

In summary, the Company's customer-weighted analysis shows that Erie, PA HDDs are a reasonable proxy for service-territory weather exposure for WNA purposes, and the Erie, PA station's complete data record further supports its use as a stable and administrable index. The opposing statement that Erie is "questionable" as representative is not supported by a quantitative representativeness test and does not account for the practical requirements of the WNA administration.

Q. Do you agree with Mr. Deupree that October and May should be removed from the WNA period?

A. No, I believe these months should still be included in the WNA period. To determine whether October and May should be included in the WNA period, a regression analysis was completed to assess the statistical significance of heating degree days on heat load per account for May and October for the impacted service classes, as shown in National Fuel Exhibit CEH-2R. The P-value, or "Probability Value," is a number which describes how likely it is that the data occurred by random chance; a number less than 0.05 indicates the results are unlikely due to chance and are therefore statistically significant. The P-value for HDDs is statistically significant for the combined service classes for both May and October, with a P-value of less than 0.05. Furthermore, the P-values for 3 of the 4 revenue classes (Residential, Commercial, Public Authority) are also statistically significant. The only revenue class with a P-value greater than 0.05 is Industrial, which contains only 1 service class (Retail - Industrial - Res E), and only has a single customer.

Q. Does this conclude your rebuttal testimony at this time?

A. Yes, it does.

NATIONAL FUEL EXHIBIT CEH-1R

Schedule: CEH- 1R
Witness: Hilliard
Page: 1 of 1

Table 1: Number of Pennsylvania Residential Customers By Service Center

Month	311 - Erie	350 - Sharon	312 - West County	347 - Oil City	344 - Meadville	332 - Elk	329 - Dubois	314 - Warren	326 - Clarion	323 - Bradford	317 - Corry	327 - Chicora	Grand Total
1/1/2025	68,760	26,478	18,075	16,724	14,861	11,980	11,025	9,915	6,601	5,354	4,722	3,218	197,713
2/1/2025	68,842	26,538	18,095	16,743	14,877	11,985	11,039	9,932	6,600	5,358	4,728	3,223	197,960
3/1/2025	68,891	26,553	18,100	16,742	14,884	11,993	11,039	9,941	6,597	5,365	4,727	3,220	198,052
4/1/2025	68,794	26,532	18,091	16,722	14,854	11,965	11,022	9,924	6,593	5,349	4,692	3,220	197,758
5/1/2025	68,570	26,400	18,062	16,629	14,781	11,914	10,971	9,901	6,566	5,327	4,684	3,207	197,012
6/1/2025	68,415	26,260	18,013	16,570	14,742	11,878	10,952	9,868	6,533	5,301	4,665	3,200	196,397
7/1/2025	68,267	26,114	17,931	16,510	14,704	11,859	10,910	9,858	6,515	5,284	4,639	3,192	195,783
8/1/2025	68,093	26,025	17,905	16,465	14,702	11,836	10,890	9,837	6,498	5,272	4,621	3,190	195,334
9/1/2025	68,014	25,989	17,928	16,464	14,697	11,827	10,891	9,839	6,501	5,275	4,606	3,185	195,216
10/1/2025	68,098	25,985	17,942	16,473	14,735	11,835	10,892	9,852	6,503	5,283	4,638	3,185	195,421
11/1/2025	68,210	26,104	17,996	16,542	14,810	11,888	10,944	9,867	6,524	5,307	4,670	3,195	196,057
12/1/2025	68,499	26,276	18,053	16,638	14,851	11,944	10,991	9,904	6,560	5,322	4,697	3,204	196,939
Average #	**68,454**	**26,271**	**18,016**	**16,602**	**14,792**	**11,909**	**10,964**	**9,887**	**6,549**	**5,316**	**4,674**	**3,203**	**196,637**
CY %	**34.8%**	**13.4%**	**9.2%**	**8.4%**	**7.5%**	**6.1%**	**5.6%**	**5.0%**	**3.3%**	**2.7%**	**2.4%**	**1.6%**	**--**
Closest Weather Station	**Erie**	**Youngstown (KYNG)**	**Erie**	**Franklin**	**Meadville**	**Ridgeway**	**Dubois AP**	**Warren**	**Fanklin**	**Bradford AP**	**Union City**	**Slippery Rock**	

Table 2: Customers Represented by NOAA Weather Station

Weather Stations	Erie	Youngstown (KYNG)	Franklin	Meadville	Ridgeway	Dubois AP	Warren	Bradford AP	Union City	Slippery Rock
# Customers Represented	86,470	26,271	23,151	14,792	11,909	10,964	9,887	5,316	4,674	3,203
% Cust. Represented	44.0%	13.4%	11.8%	7.5%	6.1%	5.6%	5.0%	2.7%	2.4%	1.6%

Table 3: Average NOAA HDD (2015-2024)

Weather Stations	Erie	Youngstown (KYNG)	Franklin	Meadville	Ridgeway	Dubois AP	Warren	Bradford AP	Union City	Slippery Rock
Jan	1,100	1,131	1,176	1,176	1,203	1,169	1,191	1,240	1,220	1,156
Feb	956	947	1,013	996	1,032	982	1,031	1,053	1,064	941
Mar	830	792	866	898	904	839	900	940	936	830
Apr	516	465	508	504	563	504	552	591	572	525
May	218	189	210	225	248	212	239	278	263	236
Jun	35	38	49	52	79	57	66	98	86	70
Jul	1	2	2	4	8	4	6	21	19	6
Aug	3	8	10	9	23	15	16	39	28	13
Sep	46	66	75	77	110	93	87	148	109	87
Oct	289	343	379	370	417	380	386	446	424	375
Nov	615	674	727	708	763	730	737	790	721	736
Dec	877	921	975	967	995	980	983	1,035	1,010	948
Total	**5,485**	**5,577**	**5,990**	**5,985**	**6,344**	**5,963**	**6,195**	**6,677**	**6,452**	**5,923**

Table 4: Erie, PA vs. Weighted Average HDDs

WNA Months	Weighted Average HDDs	Erie, PA HDDs	Percent Different
Oct	339	289	17.6%
Nov	674	615	9.6%
Dec	928	877	5.8%
Jan	1,141	1,100	3.7%
Feb	979	956	2.5%
Mar	848	830	2.2%
Apr	515	516	-0.3%
May	219	218	0.7%
Total	**5,643**	**5,399**	**4.5%**

Table 5: Number of Months With MIssing HDD Data

Weather Stations	Erie	Youngstown (KYNG)	Franklin	Meadville	Ridgeway	Dubois AP	Warren	Bradford AP	Union City	Slippery Rock
Months With Missing Data	-	-	-	10	-	2	1	1	15	33

NATIONAL FUEL EXHIBIT CEH-2R

Schedule: CEH- 2R
Witness: Hilliard
Page: 1 of 1

May Heat Load/Acct	May Actual DD	Residential	Commercial	Industrial	Public Authority	Total
5/1/2010	345	3.24	7.08	-	5.83	3.45
5/1/2011	405	4.71	8.20	-	11.05	4.96
5/1/2012	357	3.53	5.59	-	7.64	3.67
5/1/2013	293	3.56	6.89	-	8.97	3.79
5/1/2014	389	4.70	8.30	-	10.16	4.95
5/1/2015	358	4.05	7.03	-	8.95	4.26
5/1/2016	456	4.56	7.61	-	9.51	4.78
5/1/2017	355	3.56	6.07	-	7.50	3.73
5/1/2018	376	5.13	10.81	-	13.08	5.53
5/1/2019	383	4.42	8.14	-	9.36	4.68
5/1/2020	486	6.12	11.26	-	14.08	6.48
5/1/2021	370	4.85	9.28	-	11.25	5.16
5/1/2022	367	4.98	10.25	2.60	12.21	5.36
5/1/2023	405	4.72	9.25	4.15	10.27	5.03
5/1/2024	232	3.10	6.45	4.60	7.83	3.34
P-value	-	0.0004833214	0.0312695909	0.6631025964	0.0292046686	0.0009712377

October Heat Load/Acct	Oct Actual DD	Residential	Commercial	Industrial	Public Authority	Total
10/1/2010	217	1.95	3.86	-	3.90	2.03
10/1/2011	160	1.61	2.58	-	2.84	1.67
10/1/2012	227	2.25	3.59	-	4.67	2.34
10/1/2013	153	1.33	2.31	-	2.61	1.40
10/1/2014	184	1.75	2.84	-	3.15	1.82
10/1/2015	143	1.44	2.16	-	2.11	1.48
10/1/2016	98	1.01	1.54	-	2.62	1.05
10/1/2017	89	0.73	1.22	-	1.58	0.77
10/1/2018	122	1.28	2.25	-	3.38	1.35
10/1/2019	91	1.08	1.88	-	2.79	1.13
10/1/2020	162	1.91	3.35	-	4.17	2.01
10/1/2021	60	0.65	1.14	-	0.94	0.68
10/1/2022	245	2.78	4.91	1.30	6.16	2.93
10/1/2023	134	1.39	2.47	0.95	2.29	1.46
10/1/2024	101	1.10	1.99	0.40	2.31	1.16
P-value	-	0.0000000113	0.0000000944	0.2741912556	0.0000454141	0.0000000197

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 13-RJ

Rejoinder Testimony of
Cathryn E. Hilliard

Topics Addressed: Weather Stations

Dated: June 1, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Cathryn E. Hilliard. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. Did you previously submit testimony in this proceeding on behalf of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company")?

A. Yes. I submitted my direct testimony, National Fuel Statement No. 13, on January 28, 2026 and rebuttal testimony, National Fuel Statement No 13-R, on May 12, 2026.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your rejoinder testimony.

A. The purpose of this rejoinder is to respond to the statements in the surrebuttal testimony of Michael Deupree, Office of Consumer Advocate ("OCA") Statement No. 1-SR, recommending the Company recalculate the heating degree days ("HDDs") used in the weather normalization adjustment ("WNA") to include three new separate weather stations, DuBois, Pittsburgh, and Bradford, Pennsylvania, in addition to the weather station in Erie that has been used in this and many past rate cases.

Q. Are you sponsoring any exhibits with your rejoinder testimony?

A. Yes. I am sponsoring National Fuel Exhibit CEH – 1RJ, which presents a geographic depiction of the Company's Pennsylvania service territory, including the locations of nearby NOAA weather stations and population density. The exhibit illustrates the

relationship between customer concentration and Mr. Deupree's selected weather stations and provides context for evaluating the representativeness of the Erie weather station, as well as the relevance of alternative locations referenced in the proceeding. The Company's Pennsylvania service territory is outlined by color-coded boundaries that represent the area each service center is responsible for. Within the Company's service territory, the population density is shown through color shading, with green representing less populated areas and increasing intensity of red representing higher population concentrations. Service center locations are identified by labeled markers, and NOAA weather stations are shown as point locations across the territory.

III. WEATHER NORMALIZATION ADJUSTMENT

Q. Mr. Deupree recommends using multiple weather stations for the WNA. Do you agree with that recommendation?

A. No, I do not. The Company's WNA is designed to operate in conjunction with its demand forecast, which is based on normal HDDs from the first-order National Weather Service Office located at the Erie, Pennsylvania International Airport. Incorporating multiple stations into the WNA, while maintaining a forecast developed from a single station, would create inconsistency between the forecasting methodology and the reconciliation mechanism.

Q. Why is that inconsistency important?

A. The WNA is intended to compare actual weather conditions to the weather assumptions embedded in the Company's forecast. The forecast is developed using Erie normal

HDDs, and is incorporated into the Company's model that forms the basis for establishing base rates in this proceeding. As a result, the WNA operates as a reconciliation mechanism against the weather assumptions embedded in those approved base rates, and must use the same reference point to ensure that the comparison is internally consistent. Introducing additional stations into the WNA would break that alignment and could introduce distortions rather than improve accuracy. Mr. Deupree's proposal fails to account for this inconsistency.

Q. Does Mr. Deupree demonstrate that a multi-station approach would materially improve outcomes for customers?

A. No. Mr. Deupree does not quantify how the use of multiple stations would change WNA calculations or demonstrate that it would produce more accurate or representative outcomes for customers. Instead, Mr. Deupree simply produced a chart showing ten-year average HDDs for four locations in Pennsylvania, one of which is not within the Company's service territory. Without any analysis of this data, there is no basis to conclude that moving to a multi-station approach would provide any measurable benefit.

Q. Does Mr. Deupree's use of other weather stations provide a reliable basis to challenge Erie's representativeness?

A. No. Mr. Deupree includes Pittsburgh in his comparison, which, as shown in National Fuel Exhibit CEH – 1RJ, is not within the Company's service territory. Pittsburgh also has much lower HDDs than all the other weather stations located throughout the Company's service territory, with a ten-year average (2014-2025) of 5,114 HDDs. As

such, Pittsburgh weather conditions are not relevant to evaluating whether Erie is representative of the Company's customer base. Two additional weather stations were chosen in Mr. Deupree's testimony, DuBois and Bradford. While Bradford has 6,677 HDDs, 22% more than Erie, it represents only 2.7% of customers in the Company's Pennsylvania service territory. DuBois has 5,963 HHDs, or 9% more than Erie, and represents only 5.6% of the customers in the Company's Pennsylvania service territory. Together, the two weather stations only account for approximately 16,000 customers.

Q. Is data availability a potential issue when using multiple weather stations?

A. Yes. Data availability and reliability are important considerations for a tariff mechanism such as the WNA. As shown in National Fuel Exhibit CEH-1R, several of the alternative weather stations have missing HDD data for certain months, whereas the Erie station provides a complete and continuous data record over the period analyzed. The presence of missing data reduces reliability and accuracy. This is particularly important if missing data occurs during the WNA period of October through May, when actual HDDs directly affect WNA calculations. In those instances, additional assumptions or data substitution methods would be required, which would reduce transparency and introduce further complexity. By contrast, the Erie-based approach avoids these issues by relying on a complete, consistent, and readily verifiable data set.

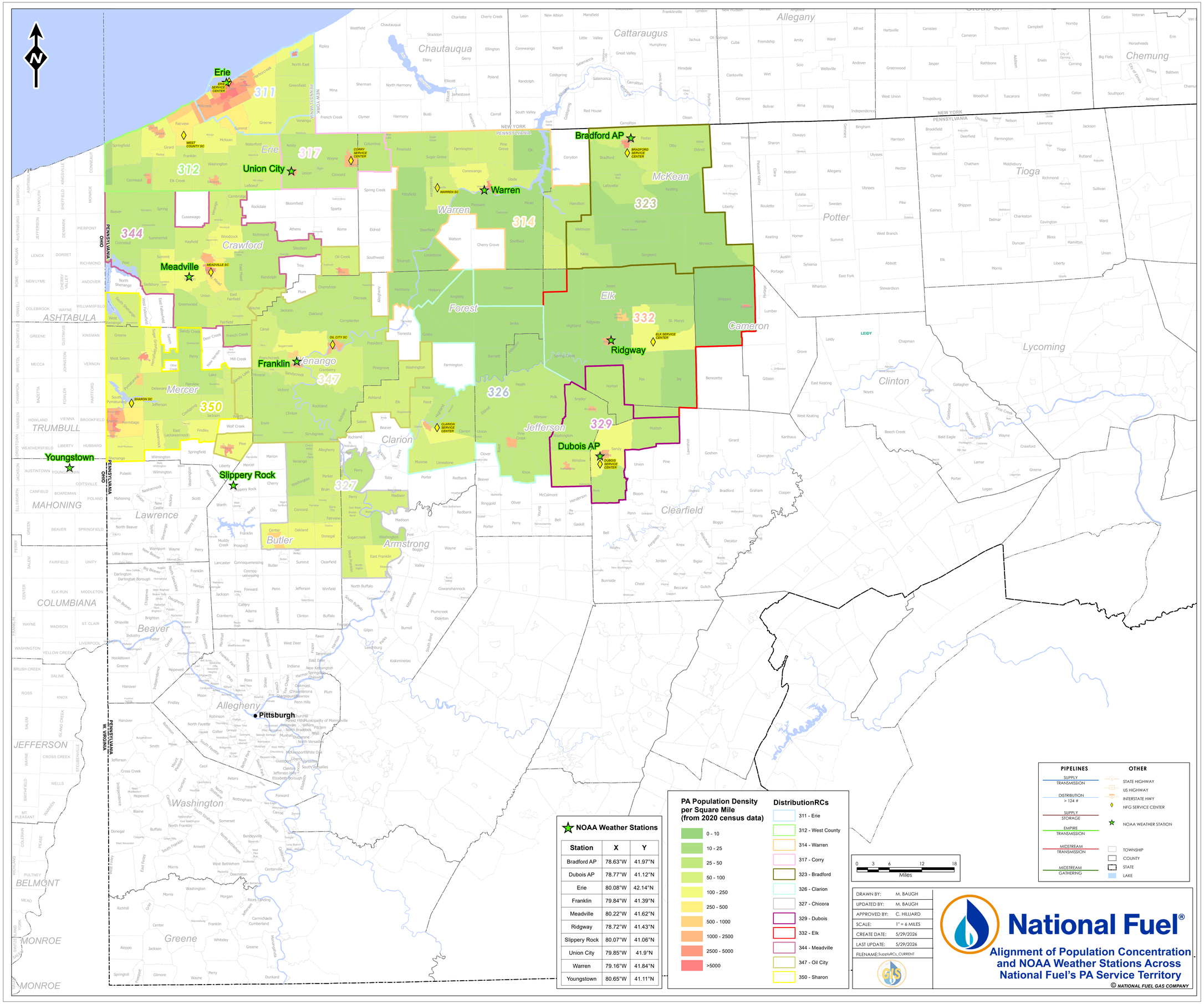
Q. What is the appropriate conclusion regarding Erie's representativeness for WNA purposes?

A. When evaluated using a customer-weighted framework and considering actual WNA outcomes, Erie provides a reasonable and appropriate proxy for system-wide weather conditions. As shown in National Fuel Exhibit CEH – 1RJ, the Company's service territory, and the majority of the population, is concentrated in northwestern Pennsylvania in proximity to Lake Erie. In addition, Mr. Deupree's testimony does not demonstrate that use of Erie results in any material bias or inequitable outcomes for customers. The current Erie-based approach provides a consistent, transparent, and administrable framework that aligns with the Company's forecasting methodology.

Q. Does this conclude your rejoinder testimony?

A. Yes, it does.

National Fuel Exhibit CEH-1RJ



NOAA Weather Stations

Station	X	Y
Bradford AP	78.63°W	41.97°N
Dubois AP	78.77°W	41.12°N
Erie	80.08°W	42.14°N
Franklin	79.84°W	41.39°N
Meadville	80.22°W	41.62°N
Ridgway	78.72°W	41.43°N
Slippery Rock	80.07°W	41.06°N
Union City	79.85°W	41.9°N
Warren	79.16°W	41.84°N
Youngstown	80.65°W	41.11°N

PA Population Density per Square Mile (from 2020 census data)

- 0 - 10
- 10 - 25
- 25 - 50
- 50 - 100
- 100 - 250
- 250 - 500
- 500 - 1000
- 1000 - 2500
- 2500 - 5000
- >5000

DistributionRCs

- 311 - Erie
- 312 - West County
- 314 - Warren
- 317 - Corry
- 323 - Bradford
- 326 - Clarion
- 327 - Chicora
- 329 - Dubois
- 332 - Elk
- 344 - Meadville
- 347 - Oil City
- 350 - Sharon

0 3 6 12 18
Miles

PIPELINES

- SUPPLY TRANSMISSION
- DISTRIBUTION > 124 #
- SUPPLY STORAGE
- EMPIRE TRANSMISSION
- MIDSTREAM TRANSMISSION
- MIDSTREAM GATHERING

OTHER

- STATE HIGHWAY
- US HIGHWAY
- INTERSTATE HWY
- NFG SERVICE CENTER
- NOAA WEATHER STATION
- TOWNSHIP
- COUNTY
- STATE
- LAKE

DRAWN BY:	M. BAUGH
UPDATED BY:	M. BAUGH
APPROVED BY:	C. HILLIARD
SCALE:	1" = 6 MILES
CREATE DATE:	5/29/2026
LAST UPDATE:	5/29/2026
FILENAME:	SupplyRCs_CURRENT

National Fuel®

Alignment of Population Concentration and NOAA Weather Stations Across National Fuel's PA Service Territory

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NATIONAL FUEL STATEMENT NO. 14

COURTNEY T. MANN

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 14

Direct Testimony of
Courtney T. Mann

Topics Addressed:
Fully Projected Future Test Year Revenues
Future Test Year Revenues
Historic Test Year Revenues
Tariff Rider Proposals
Rate Design and Bill Impacts

Dated: January 28, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Courtney T. Mann. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. By whom and in what capacity are you employed?

A. I am employed as a Rate Analyst in the Rates & Regulatory Affairs department of National Fuel Gas Distribution Corporation ("NFGDC").

Q. Please provide your educational background and professional experience.

A. In 2024, I earned a Bachelor of Science degree in Business Administration with a concentration in Finance from the State University of New York at Buffalo. In January 2024, I began employment with NFGDC as a Rate Analyst, which is my current position.

Q. Have you previously testified in other proceedings before the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission") or any other state or federal agency?

A. No.

Q. Please describe the purpose of your testimony.

A. I will address the development of revenue for NFGDC's Pennsylvania Division ("National Fuel" or the "Company") for the fully projected future test year ending October 31, 2027 ("FPFTY"), the future test year ending September 30, 2026 ("FTY"),

and for the historic test year ended September 30, 2025 ("HTY"). I will also address the Company's proposed rate design.

Q. Are any other witnesses providing testimony on the areas you identified above?

A. Yes. Company witness Cathryn E. Hilliard is providing testimony on the demand forecast methodology in National Fuel Statement No. 13. The demand forecast provides the customer counts and usage that serve as the basis for my revenue projections. Company witness John D. Taylor of Atrium Economics (National Fuel Statement No. 19) is sponsoring National Fuel Exhibit D – Cost of Service Study, which influences elements of the proposed rate design presented in my exhibits.

II. DESCRIPTION OF EXHIBITS

Q. Are you sponsoring any exhibits or filing requirements in this proceeding?

A. Yes, I am sponsoring the following Exhibits:

- National Fuel Exhibit E (Proof of Revenue)
- National Fuel Exhibit CTM-1 (FPFTY at Current Rates)
- National Fuel Exhibit CTM-2 (FPFTY at Proposed Rates)
- National Fuel Exhibit CTM-3 (FTY at Current Rates)
- National Fuel Exhibit CTM-4 (FTY at Proposed Rates)
- National Fuel Exhibit CTM-5 (HTY at Current Rates)
- National Fuel Exhibit CTM-6 (Normalized HTY at Current Rates)
- National Fuel Exhibit CTM-7 (Normalized HTY at Proposed Rates)
- National Fuel Exhibit CTM-8 (Rate Design)
- National Fuel Exhibit CTM-9 (Bill Impacts)
- National Fuel Exhibit CTM-10 (Company Justified Investment)

Each of these exhibits contains several schedules, which are described later in this section of testimony. I am also sponsoring certain responses to the Commission's standard filing requirements, as indicated on the master list accompanying this filing, which were prepared by me or under my direction.

Q. Please describe National Fuel Exhibit E.

A. Exhibit E is National Fuel's Proof of Revenue. It summarizes revenue by service class at current and proposed rates. The total difference (proposed revenues less current revenues) ties to the Company's revenue requirement shown in National Fuel Exhibit A (FPFTY). Page 1 of Exhibit E shows total revenues including revenues for purchased gas costs ("PGC"). Page 2 of Exhibit E excludes revenue for PGC and is therefore presenting delivery revenues only.

Q. Please describe National Fuel Exhibit CTM-1.

A. Exhibit CTM-1 consists of five schedules supporting FPFTY revenues at current rates. The schedules are as follows:

- Schedule 1 – Summary of Revenues
- Schedule 2 – Summary of Revenues by Service Class
- Schedule 3 – Billed Delivery Revenues by Rate Type
- Schedule 4 – Detailed Billed Revenue Workpapers
- Schedule 5 – Late Payment Charge Workpapers

The schedules are progressively more detailed. Schedule 1 summarizes revenue by Federal Energy Regulatory Commission ("FERC") account and includes columns for total revenue, gas cost, and delivery revenue. Schedule 2 supports Schedule 1 and

provides more granularity by service class. Schedule 3 provides a breakdown of billed delivery revenues by rate type, with the total supporting the delivery revenue column of Schedule 2. Schedule 4 is a detailed workpaper showing a price out of revenues at current rates, including customer counts, usage, and the revenues produced by multiplication of applicable units by current rates. Schedule 5 supports the Company's late payment charge revenue forecast included in Other Operating Revenues.

Q. Do National Fuel Exhibits CTM-2 through CTM-7 follow a similar format?

A. Yes, the subsequent exhibits have a nearly identical structure to National Fuel Exhibit CTM-1. The difference is the period to which the exhibit applies and whether it is presented at current or proposed rates. These variables are indicated in the listing of exhibits provided at the beginning of Section II of this testimony. For example, National Fuel Exhibit CTM-2 is identical to CTM-1 in terms of structure, consisting of five schedules supporting FPFTY revenues. However, it shows revenues at proposed rates instead of at current rates. The exhibits applicable to the HTY (National Fuel Exhibits CTM-5 through CTM-7) do not include Schedule 5 for late payment charges.

Q. Please provide a brief overview of National Fuel Exhibits CTM-8 and CTM-9.

A. National Fuel Exhibit CTM-8 presents the Company's rate design proposals, which are laid out in detail in Section VI of this testimony. National Fuel Exhibit CTM-9 provides a series of bill impact analyses. These schedules demonstrate the impacts of the Company's rate design on customers in each service class with varying levels of usage.

III. FORECASTED TEST YEAR REVENUE

Q. Please explain the process for developing the Company's forecasted FPFTY and FTY revenues.

A. The Company prepares an annual five-year econometric and revenue forecast. The forecast is developed on a revenue month basis and includes detail for all billed revenue line items by service class, including delivery revenues, gas costs and taxes. The revenue forecast relies on customer and usage projections provided by Market Planning, a subgroup within NFGDC's Rates & Regulatory Affairs department. The Direct Testimony of Cathryn E. Hilliard (National Fuel Statement No. 13) provides a thorough overview of Market Planning's forecasting methodology. The FPFTY and FTY exhibits at current and proposed rates are built around the monthly information contained in National Fuel's annual forecast.

Q. Describe "current rates" in the context of your testimony and exhibits.

A. Current rates refer to rates that have been previously approved by the PAPUC. Generally, these will be the rates in effect at the time the forecast was prepared.

Q. Describe "proposed rates" in the context of your testimony and exhibits.

A. Proposed rates refer to rates that the Company has filed for in this proceeding. These rates are supported by testimony and exhibits around revenue requirement, cost of service, and rate design. The rates used in my revenue exhibits at proposed rates are sourced from National Fuel Exhibit CTM-8 and are discussed later in this testimony.

Q. Is the process of forecasting revenues at proposed rates different than forecasting revenues at current rates?

A. No. The process and exhibits are identical. The current and proposed exhibits for the FPFTY and FTY use the same customer and usage forecasts. The only difference is the rates that are applied.

Q. How does the Company forecast revenue for basic service charges?

A. For each month in the forecast period, the projected number of customers in each service class is multiplied by the applicable basic service charge.

Q. Please describe distribution charges.

A. Distribution charges are the volumetric component of rate design, dependent on customer usage. These charges have a single rate that applies to all usage. For example, customers served under the Residential Service Rate Schedule currently pay a single rate per 100 cubic foot ("Ccf") of gas usage.

Q. How does the Company forecast revenue for distribution charges at current and proposed rates?

A. For each month in the forecast period at current and proposed rates, the total projected usage by service class is multiplied by the current or proposed distribution charge, respectively.

Q. How does the Company calculate forecasted revenues for the various riders in its tariff?

A. The methodology varies by rider. Most of the riders are volumetric rates, meaning the rate is charged on a dollar per Ccf basis. These rates are simply multiplied by the total usage for each applicable service class to produce forecasted revenues. This applies to Rider A – Purchased Gas Costs, Rider E – Customer Education, Rider F – Customer Assistance Program ("CAP") Discount Charge, Rider G – Merchant Function Charge ("MFC"), Rider H – Gas Procurement Charge ("GPC"), and Rider I – Other-Post Employment Benefits ("OPEB") Surcredit.

Q. How is the revenue forecasted for other riders?

A. The rate for the Distribution System Improvement Charge ("DSIC") is a percentage that applies to billed delivery charges, excluding Rider B – the State Tax Adjustment Surcharge ("STAS"). In the detailed revenue price-out schedules in my exhibits, the total base non-gas cost revenue for each service class is multiplied by a DSIC percentage. Similarly, the STAS is a percentage that is applied to all billed delivery charges, inclusive of DSIC. Since the current STAS rate is negative, Rider B reduces the customer's bill and the Company's revenues at current rates.

Q. Are the billed revenues from these riders considered base delivery revenues for the purpose of calculating revenue requirement?

A. Rider B, Rider E, Rider G, Rider H, and the DSIC are considered base delivery revenue and therefore impact the calculation of revenue requirement. The STAS and DSIC

percentages will be reset to zero as part of National Fuel's proposed rate design, as discussed later in this testimony. Rider A, Rider F, and Rider I are included in gas cost revenue in the forecast and do not factor into the calculation of revenue requirement. Rider A includes a PGC Distribution Charge (not to be confused with the base delivery rate discussed on page 6 of this testimony), Natural Gas Supply Charge ("NGS"), and Gas Adjustment Charge ("GAC"). Rider F and Rider I are not technically gas costs; however, they are categorized as such because they have offsetting funding sources and should affect the determination of base delivery rates.

Q. Are revenues for CAP customers inclusive of CAP discounts expected to be provided in the FTY and FPFTY?

A. No. Revenues for CAP customers are forecasted at undiscounted tariff rates. Since CAP is funded through a rider, this methodology has no bearing on delivery revenues used in calculating revenue requirement. Residential rate design treats all residential customers alike, whether they're CAP participants who receive discounts or non-participants who fund those discounts through Rider F.

Q. How are customers with negotiated rate contracts reflected in the forecast?

A. The Company has negotiated rate contracts with several large industrial customers that are bypass threats. As discussed in the Direct Testimony of Erik M. Solomon in National Fuel Statement No. 18, many customers in the Company's service territory have an opportunity to bypass National Fuel by connecting directly to an interstate pipeline, local producer, or gathering system at a lower cost. To retain these customers, the Company

negotiates a competitive delivery rate that is lower than the tariff rate for the applicable service class. This group of customers is forecasted separately from customers receiving tariff rates. Each negotiated customer's usage is multiplied by the projected negotiated rate, which may increase annually due to inflation escalators specified in the contract. The exhibit rolls up the total usage for all negotiated customers within a service class and multiplies that usage by the weighted average negotiated rate for that service class. All of the Company's customers that are currently on negotiated rate contracts are served under Large Industrial Service.

Q. What is the Company including in its forecast of Other Operating Revenues?

A. Other Operating Revenues are comprised of late payment charges ("LPCs"), rent from gas property, and other gas revenues. LPCs are included in FERC account 487 (forfeited discounts) and account for most of the forecasted Other Operating Revenues. Rent from gas property includes rents received for the use by others of land, buildings, and other property devoted to gas operations by the utility. Other gas revenues include any revenues derived from gas operations not includible in any other revenue accounts – primarily capacity release revenues and marketer billing charges.

Q. How did the Company forecast LPC revenue?

A. LPC revenue for the FPFTY and FTY was forecasted by applying a percentage to total forecasted revenues by month. The percentage applied varies by month, since the forecast is comprised of monthly data and LPCs fluctuate throughout the year. Customers are more likely to pay bills late during the winter heating season. The

percentages utilized in the forecast are based on a trend analysis comprised of three years of historical data.

Q. How did the Company forecast rent from gas property and other gas revenues?

A. Revenues for these categories were assumed to remain at the same level as reported for the HTY in National Fuel Exhibit CTM-5, except for capacity release revenues which have been removed from the FTY and FPFTY.

Q. Why is it appropriate to remove capacity release revenues from the FTY and FPFTY?

A. Under its tariff, the Company is to retain 25% of revenues generated from capacity releases, while the other 75% is refunded to customers through purchased gas cost rates. This sharing arrangement incentivizes the Company to optimize its use of pipeline capacity. These revenues should be treated as below the line for ratemaking purposes.

IV. HISTORIC TEST YEAR REVENUE

Q. Describe the Company's process for developing HTY revenues.

A. HTY revenues are based on actual billed revenue as reported by the Company's SAP billing system. SAP reports provide detailed billed revenue and usage data by service class and billing line item. On a monthly basis, this data is reconciled to the Company's financial statements. Actual revenues for the HTY (i.e., those seen in National Fuel Exhibit CTM-5, before normalization) are not based on a price out of units multiplied by rates. Additionally, rates are not presented in the detailed revenue workpapers provided

in Schedule 4 of National Fuel Exhibit CTM-5. In practice, multiplying the effective rates for a given month by customer counts and volumes reported by SAP would not yield the exact billed revenue. This is primarily due to prorated bills and prior period bill adjustments.

Q. What is a prorated bill?

A. If the length of a customer's billing period is between 26 to 35 days, the customer will be billed the full tariff rate. If the billing period is shorter than 26 days or longer than 35 days, the bill will be prorated. The most common reason for a prorated bill is a residential customer moving out of their residence during the billing period. If a customer moved out 15 days into their bill cycle, the current basic service charge of $14 would be prorated: $14 x (15 days / (365 days / 12 months)) = $6.90

Longer bill periods are sometimes the result of holidays that extend the typical meter reading and/or billing schedules. Due to the wide variety of prorated billing charges, the number of customers cannot simply be multiplied by the tariff rate to produce an accurate revenue amount.

Q. How do prior period bill adjustments factor into HTY revenues?

A. Prior period bill adjustments are typically the result of estimated meter reads and can span several months. The reported usage for the revenue month is the net of the current month's usage and any prior period adjustments. The reported revenues will include the net of current charges and any adjustments, each billed at the appropriate rates in effect for the prior period.

Q. How does weather impact the HTY revenues in National Fuel Exhibit CTM-5?

A. The exhibit shows actual usage and revenue, which can be influenced by weather. Warmer weather results in lower gas usage, which leads to lower revenue. National Fuel Exhibit CTM-5 also includes Weather Normalization Adjustment revenue for the HTY, which partially offsets the impacts of weather on revenues.

Q. National Fuel Exhibits CTM-6 and CTM-7 present normalized HTY revenues. Explain the normalization methodology.

A. Since the HTY revenues presented in National Fuel Exhibit CTM-5 are impacted by weather, they are not necessarily comparable to the FTY and FPFTY revenues based on forecasted normalized usage. To develop HTY exhibits that are comparable, the Company utilized an application to perform load normalization calculations by service class. The application contains a database of historical customer billing information. It calculates base and heating loads by month for each applicable service class and determines a heating degree day factor based on the heating load per actual degree day. It then applies that factor to normal heating degree days ("NHDDs") for the month to establish a normalized heating load. NHDDs are based on a 10-year average (2015-2024) as reported by the National Oceanic and Atmospheric Administration. The normalized heating load is added to the base load to determine normalized usage per account. The normalized usage per account is multiplied by the number of customers to produce normalized usage by month for the service class. The resulting normalized usage was then flowed through the Company's revenue price-out.

Q. Were all customer revenues adjusted for usage at normal weather?

A. No, industrial customers are not considered weather sensitive. Only usage for residential, commercial, and public authority customers has been normalized for weather.

V. TARIFF RIDER PROPOSALS

A. Rider I (OPEB Surcredit) Proposal

Q. Provide an overview of the Company's Rider I.

A. Rider I was established in Docket Nos. R-2021-3027406 and C-2021-3028654 (collectively the "2021 OPEB Dockets"). In those proceedings, the Commission approved the Company's petition to refund $54 million of OPEB funds in its grantor trust through 2026.

Q. How were funds returned to customers?

A. The funds were passed back to customers through a combination of a one-time bill credit followed by a volumetric surcredit over five years. $25 million was earmarked for the one-time credit and the remainder was to be passed back through Rider I. The Company has a regulatory liability on its books of $0.484 million related to the one-time bill credits, as the full $25 million set aside for those credits was not necessary based on customer counts at the time of the credit's issuance. As it stands, the volumetric surcredit via Rider I will end September 30, 2026, prior to the start of the FPFTY.

Q. What is the Company proposing in this proceeding?

A. As discussed in Direct Testimony of Michael P. Weidner in National Fuel Statement No. 5, the Company has an additional $6.7 million of available funds in the grantor trust. Including the previously mentioned regulatory liability of $0.484 million, the Company is proposing to provide rate relief to customers totaling approximately $7.2 million during the FPFTY. First, a one-time bill credit of $30 would be provided to verified low-income customers. This is expected to total around $1.025 million. The remainder, approximately $6.2 million, would be passed back to customers during the FPFTY using the existing Rider I. The amount to be refunded through Rider I has been allocated to the Company's service classes using the same allocation from the settlement reached in the 2021 OPEB Dockets.

Q. How does this proposal impact proposed customer bills in the FPFTY?

A. Revenues at current rates were based on Rider I ending prior to the start of the FPFTY. Revenues at proposed rates reflect the Company's proposal to re-activate the OPEB Surcredit. The effect of this proposal is shown in National Fuel Exhibit E, Schedule 3. Note that the Rider I proposal does not impact the proof of revenue shown on National Fuel Exhibit E, Schedule 2, which ties to the Company's FPFTY revenue requirement presented in National Fuel Exhibit A. Since the proposed surcredit is funded by the grantor trust, there is no revenue requirement impact. The $30 bill credit to verified low income customers is not reflected in the bill impact analyses provided in my exhibits.

B. Energy Efficiency Rider Proposal

Q. Is the Company proposing a new pilot program related to energy efficiency ("EE")?

A. Yes. The proposal is discussed in the Direct Testimony of Erik M. Solomon in National Fuel Statement No. 18.

Q. How does the Company propose to recover the costs associated with the EE pilot program?

A. National Fuel proposes creating a new rider through which it will collect funding for the EE pilot program from residential customers. The rider would be added to the Company's tariff as Rider D – Energy Efficiency Pilot Program.

Q. Have you calculated bill impacts for the proposed EE rider?

A. Yes, the average residential customer's annual program cost would result in a bill increase of $3.72 or less than 1% of the average delivery bill.

VI. BASE RATE DESIGN & CUSTOMER BILL IMPACTS

Q. Please provide an overview of how the Company developed its proposed rate design.

A. The Company's proposed rate design was developed in conjunction with Company witness John D. Taylor's Allocated Cost of Service Study ("ACOSS"). The ACOSS is presented in National Fuel Exhibit D. As discussed in Mr. Taylor's testimony (National Fuel Statement No. 19), the proposed revenue increases were allocated to the Company's service classes based on current rates of return for each class and the desire to gradually move toward full parity. Full parity means the revenues collected from individual service

classes are aligned with the cost of service associated with that service class. After allocating the revenue increase, the rate design process consists of setting the basic service charge, resetting riders, and allocating the remaining increase to the volumetric distribution charge.

Q. Have you provided an exhibit that summarizes the change in revenue by rate class?

A. Yes. National Fuel Exhibit E – Proof of Revenue shows a comparison of present and proposed revenues for each rate class. Page 1 of the exhibit presents total revenues including PGC revenues, while page 2 excludes PGC revenues and shows only base delivery revenues. Both pages include the total change in revenue and the percentage change in revenue by rate class, as well as allocation of the total rate increase by rate class.

Q. Have you prepared a summary of current and proposed rates?

A. Yes. National Fuel Exhibit CTM-8 supports the Company's rate design and includes a summary of current and proposed rates by rate class.

Q. Provide an overview of proposed changes to basic service charges.

A. As shown in Table 1 on the following page, the Company proposes to increase the basic service charge for Residential, SCPA-LL, SCPA-UL, LVIS, and LIS service classes. The Company is not proposing changes to the basic service charges for LCPA, SVIS, and IVIS service classes.

Table 1: Summary of Basic Service Charges

Service Class	ACOSS Customer Charge	Current Basic Service Charge	Proposed Basic Service Charge	% Change
Residential	$27.15	$14.00	$19.00	35.7%
SCPA-LL	$30.38	$27.00	$30.00	11.1%
SCPA-UL	$70.53	$37.00	$50.00	35.1%
LCPA	$100.65	$151.00	$151.00	0.0%
SVIS	$76.99	$82.00	$82.00	0.0%
IVIS	$213.39	$252.00	$252.00	0.0%
LVIS	$1,406.51	$1,023.00	$1,400.00	36.9%
LIS	$1,750.80	$1,165.00	$1,700.00	45.9%

Q. Will the proposed fixed customer charges recover all of the Company's fixed distribution costs?

A. No. The ACOSS categorizes the Company's distribution costs as customer-related, demand-related, and energy-related. Customer-related costs are incurred to serve each customer regardless of usage and are appropriately recovered, in part, through a fixed monthly customer charge. Demand-related costs reflect the infrastructure and capacity required to safely and reliability meet customers' peak-day requirements. These costs are driven by system design needs rather than by monthly consumption levels and do not vary with short-term changes in customer usage. Under current rates, the Company recovers the majority of fixed customer and demand-related costs through volumetric charges. As a result, a significant portion of costs that are fixed or capacity-driven are recovered through rates that vary with customer usage (and weather). This creates a misalignment between cost incurrence and revenue recovery. For example, while most of the Company's distribution costs are fixed, only 40% of residential delivery revenue will be recovered through a fixed monthly charge under the proposed rate design. This

still leaves the Company subject to considerably volatility with respect to cost recovery because the remaining costs are recovered through volumetric rates which can be substantially affected by weather.

Q. Are you proposing to collect demand-related costs through the residential fixed monthly charge?

A. No. While it would not be inappropriate for fixed demand-related costs to be recovered through a fixed rate, the residential basic service charge increases in the proposed rate design are based only on the ACOSS's customer-related costs.

Q. Why is the Company's proposed increase to the residential basic service charge appropriate?

A. While the ACOSS supports a monthly charge of $27, the Company's proposed movement from $14 to $19 per month represents less than half of the difference between current rates and full ACOSS alignment. If approved, this would be just the second increase to the basic service charge in nearly 20 years. The Company recognizes that the Commission has recently expressed concerns regarding fixed customer charge increases. A $19 monthly charge would be within the range of outcomes approved by the Commission for National Fuel's peers.

Q. Does this proposed increase affect all residential customers equally?

A. No. Customers that use less gas each month will see slightly higher bill impacts than average-use or high-use customers. In performing its rate design, the Company kept in

mind the range of bill impacts that its proposals would have on customers with different usage patterns. In winter months, the number of high-usage customers that would benefit from a higher basic service charge heavily outnumber the low-usage customers would see slightly higher bill impacts. Additionally, low-income customers tend to be higher-use customers.

Q. Why is the Company proposing to increase the basic service charge for SCPA-LL, SCPA-UL, LVIS, and LIS service classes and not LCPA, SVIS, and IVIS?

A. The Company proposes increasing the basic service charge for SCPA-LL, SCPA-UL, LVIS, and LIS service classes to better align with the ACOSS. The Company does not propose to increase the basic service charge for LCPA, SVIS, and IVIS service classes because their current basic service charge exceeds the ACOSS.

Q. Is the Company proposing to modify or reset any current rate mechanisms or riders?

A. Yes. National Fuel's tariff requires the Company to reset Rider B and the DSIC rate when filing for new base rates. Additionally, the Company is proposing an update to the MFC uncollectible percentage included in the calculation of Rider G. These changes are reflected in Exhibit F – Proposed Tariff, as discussed in the Direct Testimony of Wanya' D. Bruce in National Fuel Statement No. 15.

Q. Please explain the Rider B reset.

A. The goal of the STAS is to pass on the effects of any changes in state tax rates to customers, compared to when base rates were last established. For example, the recent step down in the corporate tax rate has been flowed through the STAS as a negative percentage applied to the delivery portion of the bill, compensating customers for the fact that National Fuel is experiencing lower state income tax expense than when base rates were set in the Company's 2022 Rate Case. The Company's tariff requires that the STAS is recomputed whenever the utility makes effective an increase or decrease in base rates, exclusive of PGC rates and applicable rider rates. Since the lower state income tax rate has been reflected in the Company's FPFTY revenue requirement in this filing, the STAS is reset to zero in the proposed rate design presented in National Fuel Exhibit CTM-8, Schedule 1.

Q. Explain the DSIC reset.

A. The DSIC allows the Company to accelerate the replacement of aging infrastructure by providing recovery between rate cases of prudently incurred costs incurred to repair, improve, or replace certain types of property. National Fuel's tariff requires that the DSIC be reset at zero when new base rates become effective. At that point, the costs previously recovered through the DSIC will have been rolled into the Company's rate base used to calculate revenue requirement and to set the new base rates. In National Fuel Exhibit CTM-8, Schedule 1, the DSIC revenue that's included in revenues at current rates is set to zero when calculating revenue at proposed rates. This action shifts the cost recovery from a surcharge into base delivery rates.

Q. What is the Company proposing to change in Rider G?

A. Rider G recovers MFC uncollectible expenses, or the amount of PGC revenue that the Company expects it will not collect from customers due to non-payment. Residential and non-residential rates are individually calculated by multiplying a percentage by the Rider A NGS and GAC rates. The Company is proposing to update the residential and non-residential percentages. The calculation for the proposed percentages is shown in National Fuel Exhibit CTM-8, Schedule 3.

Q. Explain how changes to volumetric rates were determined for each service class.

A. Each class started with a targeted delivery revenue amount. After accounting for revenue impacts from changes to basic service charges and riders, the remaining balance for each service class was allocated to the volumetric distribution charge. The balance was divided by the forecasted usage to determine the necessary change in the unit rate to meet the targeted delivery revenue. These calculations are shown for each service class on National Fuel Exhibit CTM-8, Schedule 1.

Q. Have you prepared bill impact analyses that demonstrate the effect of the proposed rate design?

A. Yes. Refer to National Fuel Exhibit E for a high-level summary of impacts by service class. National Fuel Exhibit CTM-9 provides a detailed bill impact analysis, including bill impact tables for a range of usage levels by service class. The bill impact tables include the number of cycle bills by usage for the most recent January and July billing months.

Q. Are you sponsoring any other exhibits?

A. Yes, I have prepared National Fuel Exhibit CTM-10. This exhibit supports updated factors presented in the Company's proposed tariff (see National Fuel Exhibit F) for determination of Company investment for upgrade/extension of facilities. The calculation produces justified Company investment per dollar of additional annual revenue. National Fuel's tariff permits modifications to these factors as deemed necessary and/or convenient by the Company. These factors are based primarily on outputs from National Fuel Exhibit A. I recommend that these factors be updated later in this proceeding, as part of a tariff compliance filing, to reflect the outcome determined by the Commission.

Q. Does this conclude your direct testimony at this time?

A. Yes.

NATIONAL FUEL EXHIBIT CTM-1

FULLY PROJECTED FUTURE TEST YEAR

CURRENT RATES

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Summary of Revenues (Current Rates)

	Account	Reference	Total Revenue	Total Gas Cost	Total Delivery
Gas Sales					
Residential	480	CTM-1, Sch. 2	189,133,311	100,054,941	89,078,370
Commercial	481	""	28,281,397	16,764,586	11,516,811
Industrial	481	""	1,983,369	1,285,900	697,469
Public Authority	481	""	1,989,940	1,245,973	743,967
Subtotal			221,388,017	119,351,400	102,036,617
Transportation					
Residential	489	CTM-1, Sch. 2	9,053,857	765,184	8,288,673
Commercial	489	""	12,701,242	1,808,495	10,892,747
Industrial	489	""	15,425,698	1,657,414	13,768,284
Public Authority	489	""	5,681,638	988,089	4,693,549
Subtotal			42,862,436	5,219,182	37,643,254
Total Billed Revenue			264,250,453	124,570,582	139,679,870
Other Operating Revenues					
Forfeited Discounts	487	CTM-1, Sch. 5	1,125,448	0	1,125,448
Rent From Gas Property	493		100,267	0	100,267
Other Gas Revenues	495		47,653	0	47,653
Subtotal			1,273,368	0	1,273,368
Total Operating Revenue			265,523,820	124,570,582	140,953,238

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Summary of Revenues by Service Class (Current Rates)

	Account	Reference (CTM-2, Sch. 4)	Average Customers	Total Usage (Mcf)	Total Revenue	Total Gas Cost	Total Delivery
Residential Sales	480	Page 1	174,314	16,570,240	181,860,489	96,183,614	85,676,875
Residential CAP	480	Page 2	6,478	681,296	7,272,822	3,871,327	3,401,495
Residential SATC	489	Page 3	16,558	1,591,601	8,556,660	708,740	7,847,920
Residential MMT	489	Page 4	475	115,189	497,197	56,444	440,753
Total Residential			197,825	18,958,326	198,187,168	100,820,125	97,367,043
Small Commercial < 250 Sales	481	Page 5	8,181	903,474	10,210,208	5,133,809	5,076,399
Small Commercial < 250 SATC	489	Page 6	589	69,868	399,092	31,113	367,979
Small Commercial < 250 MMT	489	Page 7	1,107	151,202	813,671	74,089	739,582
Small Commercial > 250 Sales	481	Page 8	2,709	1,255,860	11,273,150	7,136,173	4,136,977
Small Commercial > 250 SATC	489	Page 9	234	110,600	396,026	49,252	346,774
Small Commercial > 250 MMT	489	Page 10	1,163	664,215	2,295,728	325,465	1,970,263
Large Commercial	481	Page 11	431	720,949	6,268,841	4,096,650	2,172,191
Large Commercial SATC	489	Page 12	47	73,045	248,212	32,527	215,685
Large Commercial MMT	489	Page 13	728	2,644,998	7,280,231	1,296,049	5,984,182
Large Commercial DMT	489	Page 14	11	716,683	1,268,282	0	1,268,282
Natural Gas Vechicles	481	Page 15	7	70,034	529,199	397,954	131,245
Total Commercial			15,204	7,380,929	40,982,639	18,573,081	22,409,558
Small Public Authority < 250 Sales	481	Page 16	364	132,454	1,213,452	752,646	460,806
Small Public Authority < 250 SATC	489	Page 17	23	2,523	15,000	1,123	13,877
Small Public Authority < 250 MMT	489	Page 18	228	34,706	177,838	17,005	160,833
Small Public Authority > 250 Sales	481	Page 19	99	37,700	346,558	214,220	132,338
Small Public Authority > 250 SATC	489	Page 20	19	10,118	35,116	4,504	30,612
Small Public Authority > 250 MMT	489	Page 21	230	123,113	432,176	60,327	371,849
Large Public Authority	481	Page 22	31	49,118	429,930	279,107	150,823
Large Public Authority SATC	489	Page 23	3	3,788	13,970	1,685	12,285
Large Public Authority MMT	489	Page 24	282	1,843,767	4,648,231	903,445	3,744,786
Large Public Authority DMT	489	Page 25	3	203,162	359,308	0	359,308
Total Public Authority			1,282	2,440,449	7,671,579	2,234,062	5,437,517
SVIS Sales	481	Page 26	127	60,192	611,951	342,031	269,920
SVIS SATC	489	Page 27	11	4,900	24,150	2,182	21,968
SVIS MMT	489	Page 28	64	39,506	171,199	19,357	151,842
IVIS Sales	481	Page 29	54	166,107	1,371,418	943,869	427,549
IVIS SATC	489	Page 30	3	5,658	19,927	2,520	17,407
IVIS MMT	489	Page 31	271	2,507,113	5,589,771	1,228,484	4,361,287
IVIS DMT	489	Page 32	24	711,200	1,069,977	0	1,069,977
LVIS MMT	489	Page 33	7	468,000	821,263	229,318	591,945
LVIS DMT	489	Page 34	19	1,765,913	2,138,309	0	2,138,309
LIS MMT	489	Page 35	1	358,268	415,020	175,553	239,467
LIS DMT	489	Page 36	9	3,344,983	2,230,887	0	2,230,887
LIS DMT Negotiated	489	Page 37	10	9,037,676	2,945,197	0	2,945,197
Total Industrial			600	18,469,516	17,409,066	2,943,314	14,465,752
Grand Total			**214,911**	**47,249,221**	**264,250,453**	**124,570,582**	**139,679,870**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Billed Delivery Revenues by Rate Type (Current Rates)

	Account	Reference (CTM-2, Sch. 4)	Basic Service Charge	Distribution Charge	Rider B	DSIC	Rider E	Rider G	Rider H	Total Delivery
Residential Sales	480	Page 1	29,284,703	49,066,137	(233,650)	4,090,977	0	1,564,787	1,903,921	85,676,875
Residential CAP	480	Page 2	1,088,381	2,017,384	(9,307)	162,419	0	64,337	78,281	3,401,495
Residential SATC	489	Page 3	2,781,713	4,712,891	(21,414)	374,730	0	0	0	7,847,920
Residential MMT	489	Page 4	79,818	341,087	(1,197)	21,045	0	0	0	440,753
Total Residential			33,234,614	56,137,499	(265,568)	4,649,172	0	1,629,124	1,982,201	97,367,043
Small Commercial < 250 Sales	481	Page 5	2,650,536	2,077,448	(13,866)	242,394	0	16,078	103,809	5,076,399
Small Commercial < 250 SATC	489	Page 6	190,755	160,656	(1,002)	17,571	0	0	0	367,979
Small Commercial < 250 MMT	489	Page 7	358,614	347,675	(2,021)	35,314	0	0	0	739,582
Small Commercial > 250 Sales	481	Page 8	1,202,648	2,581,421	(11,274)	197,536	0	22,348	144,298	4,136,977
Small Commercial > 250 SATC	489	Page 9	103,822	227,339	(945)	16,558	0	0	0	346,774
Small Commercial > 250 MMT	489	Page 10	516,261	1,365,294	(5,369)	94,078	0	0	0	1,970,263
Large Commercial	481	Page 11	780,368	1,198,361	(5,925)	103,720	0	12,830	82,837	2,172,191
Large Commercial SATC	489	Page 12	84,560	121,415	(589)	10,299	0	0	0	215,685
Large Commercial MMT	489	Page 13	1,318,230	4,396,516	(16,302)	285,737	0	0	0	5,984,182
Large Commercial DMT	489	Page 14	19,932	1,191,270	(3,480)	60,560	0	0	0	1,268,282
Natural Gas Vechicles	481	Page 15	0	125,333	(355)	6,267	0	0	0	131,245
Total Commercial			7,225,726	13,792,728	(61,128)	1,070,033	0	51,256	330,945	22,409,558
Small Public Authority < 250 Sales	481	Page 16	117,936	304,565	(1,275)	22,004	0	2,357	15,219	460,806
Small Public Authority < 250 SATC	489	Page 17	7,452	5,801	(39)	663	0	0	0	13,877
Small Public Authority < 250 MMT	489	Page 18	73,791	79,802	(440)	7,680	0	0	0	160,833
Small Public Authority > 250 Sales	481	Page 19	43,882	77,492	(358)	6,319	0	671	4,332	132,338
Small Public Authority > 250 SATC	489	Page 20	8,436	20,798	(83)	1,462	0	0	0	30,612
Small Public Authority > 250 MMT	489	Page 21	102,046	253,059	(1,012)	17,755	0	0	0	371,849
Large Public Authority	481	Page 22	55,870	81,645	(411)	7,202	0	874	5,644	150,823
Large Public Authority SATC	489	Page 23	5,436	6,297	(34)	587	0	0	0	12,285
Large Public Authority MMT	489	Page 24	511,437	3,064,709	(10,168)	178,807	0	0	0	3,744,786
Large Public Authority DMT	489	Page 25	5,436	337,695	(980)	17,157	0	0	0	359,308
Total Public Authority			931,722	4,231,864	(14,800)	259,634	0	3,902	25,194	5,437,517
SVIS Sales	481	Page 26	125,050	124,730	(736)	12,888	0	1,071	6,916	269,920
SVIS SATC	489	Page 27	10,824	10,155	(60)	1,049	0	0	0	21,968
SVIS MMT	489	Page 28	63,140	81,865	(413)	7,250	0	0	0	151,842
IVIS Sales	481	Page 29	164,556	221,703	(1,167)	20,415	0	2,956	19,086	427,549
IVIS SATC	489	Page 30	9,072	7,551	(48)	831	0	0	0	17,407
IVIS MMT	489	Page 31	818,748	3,346,244	(11,955)	208,250	0	0	0	4,361,287
IVIS DMT	489	Page 32	72,576	949,239	(2,928)	51,091	0	0	0	1,069,977
LVIS MMT	489	Page 33	85,932	479,372	(1,625)	28,265	0	0	0	591,945
LVIS DMT	489	Page 34	233,244	1,808,824	(5,863)	102,103	0	0	0	2,138,309
LIS MMT	489	Page 35	13,980	214,710	(658)	11,435	0	0	0	239,467
LIS DMT	489	Page 36	125,820	2,004,648	(6,105)	106,523	0	0	0	2,230,887
LIS DMT Negotiated	489	Page 37	139,800	2,672,862	(8,099)	140,633	0	0	0	2,945,197
Total Industrial			1,862,742	11,921,905	(39,657)	690,734	0	4,027	26,002	14,465,752
Grand Total			**43,254,804**	**86,083,996**	**(381,153)**	**6,669,573**	**0**	**1,688,309**	**2,364,342**	**139,679,870**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Current Rates)

Residential Sales Service	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	172,279	173,990	174,858	175,562	176,296	176,225	175,236	174,483	174,312	173,568	173,213	171,743	2,091,764
Total Volume	1,227,199	2,254,822	2,876,116	2,867,698	2,503,507	1,899,677	1,180,335	490,669	250,110	221,828	263,885	534,395	16,570,240
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$2,411,908	$2,435,854	$2,448,010	$2,457,864	$2,468,151	$2,467,146	$2,453,304	$2,442,766	$2,440,368	$2,429,956	$2,424,980	$2,404,398	$29,284,703
Volumetric Distribution Charge	3,633,858	6,676,753	8,516,468	8,491,540	7,413,134	5,625,133	3,495,091	1,452,919	740,601	656,854	781,390	1,582,398	49,066,137
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	115,889	212,931	271,602	270,807	236,415	179,393	111,463	46,336	23,619	20,948	24,920	50,465	1,564,787
Rider H - Gas Procurement Charge	141,005	259,079	330,466	329,498	287,653	218,273	135,621	56,378	28,738	25,488	30,320	61,402	1,903,921
DSIC - Distribution System Improvement Charge	315,133	479,231	578,327	577,485	520,268	424,497	309,774	199,920	161,666	156,662	163,080	204,933	4,090,977
Total Base Non Gas Cost Rate Revenue	$6,617,792	$10,063,847	$12,144,873	$12,127,195	$10,925,620	$8,914,442	$6,505,252	$4,198,318	$3,394,991	$3,289,908	$3,424,690	$4,303,596	$85,910,525
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360
Rider F - CAP Discount Charge	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$546,472	$1,004,072	$1,280,735	$1,276,986	$1,114,812	$845,926	$525,603	$218,495	$111,374	$98,780	$117,508	$237,966	$7,378,729
Natural Gas Supply Charge ($/Mcf) - Rider A	6,176,981	11,349,420	14,476,645	14,434,271	12,601,151	9,561,832	5,941,099	2,469,731	1,258,904	1,116,547	1,328,238	2,689,826	83,404,645
Gas Adjustment Charge ($/Mcf) - Rider A	249,858	459,082	585,577	583,863	509,714	386,774	240,316	99,900	50,922	45,164	53,727	108,803	3,373,700
Rider F - CAP Discount Charge	150,086	275,765	351,749	350,719	306,179	232,330	144,355	60,009	30,588	27,130	32,273	65,357	2,026,540
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$7,123,397	$13,088,339	$16,694,706	$16,645,839	$14,531,856	$11,026,862	$6,851,373	$2,848,135	$1,451,788	$1,287,621	$1,531,746	$3,101,952	$96,183,614
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($17,726)	($26,956)	($32,530)	($32,483)	($29,265)	($23,878)	($17,425)	($11,245)	($9,094)	($8,812)	($9,173)	($15,063)	($233,650)
Total Revenues	$13,723,464	$23,125,230	$28,807,049	$28,740,552	$25,428,211	$19,917,426	$13,339,200	$7,035,207	$4,837,686	$4,568,717	$4,947,263	$7,390,484	$181,860,489
Unit Margin ($/Mcf)	$5.3926	$4.4633	$4.2227	$4.2289	$4.3641	$4.6926	$5.5114	$8.5563	$13.5740	$14.8309	$12.9780	$8.0532	$5.1846

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Current Rates)

Residential CAP	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	7,513	7,115	6,964	6,602	6,027	5,875	6,289	6,210	5,665	5,689	5,725	8,067	77,741
Total Volume	56,871	101,383	124,609	117,863	94,031	68,113	48,442	19,338	8,208	7,153	8,629	26,656	681,296
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$105,180	$99,610	$97,497	$92,432	$84,378	$82,253	$88,043	$86,944	$79,303	$79,647	$80,150	$112,944	$1,088,381
Volumetric Distribution Charge	168,401	300,206	368,979	349,006	278,436	201,690	143,441	57,261	24,303	21,179	25,552	78,930	2,017,384
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	5,371	9,574	11,767	11,130	8,880	6,432	4,575	1,826	775	675	815	2,517	64,337
Rider H - Gas Procurement Charge	6,534	11,649	14,318	13,543	10,804	7,826	5,566	2,222	943	822	992	3,063	78,281
DSIC - Distribution System Improvement Charge	14,274	21,052	24,628	23,306	19,125	14,910	12,081	7,413	5,266	5,116	5,375	9,873	162,419
Total Base Non Gas Cost Rate Revenue	$299,760	$442,091	$517,189	$489,416	$401,623	$313,111	$253,705	$155,666	$110,591	$107,440	$112,884	$207,328	$3,410,802
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$25,325	$45,146	$55,488	$52,485	$41,872	$30,331	$21,571	$8,611	$3,655	$3,185	$3,843	$11,870	$303,382
Natural Gas Supply Charge ($/Mcf) - Rider A	286,254	510,302	627,205	593,254	473,298	342,841	243,827	97,335	41,312	36,001	43,435	134,169	3,429,233
Gas Adjustment Charge ($/Mcf) - Rider A	11,579	20,642	25,370	23,997	19,145	13,868	9,863	3,937	1,671	1,456	1,757	5,427	138,712
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$323,158	$576,090	$708,063	$669,736	$534,315	$387,040	$275,261	$109,883	$46,638	$40,642	$49,035	$151,466	$3,871,327
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($803)	($1,184)	($1,385)	($1,311)	($1,076)	($839)	($680)	($417)	($296)	($288)	($302)	($726)	($9,307)
Total Revenues	$622,115	$1,016,997	$1,223,867	$1,157,841	$934,862	$699,312	$528,286	$265,132	$156,933	$147,794	$161,617	$358,068	$7,272,822
Unit Margin ($/Mcf)	$5.2709	$4.3606	$4.1505	$4.1524	$4.2712	$4.5969	$5.2373	$8.0498	$13.4743	$15.0213	$13.0813	$7.7780	$5.0063

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Current Rates)

Residential SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	16,280	16,241	16,289	16,285	16,354	16,403	16,599	16,767	16,864	17,050	17,136	16,427	198,694
Total Volume	118,701	216,665	275,420	272,691	237,611	181,451	115,077	47,731	24,800	22,117	26,013	53,326	1,591,601
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$227,922	$227,370	$228,046	$227,984	$228,954	$229,641	$232,389	$234,733	$236,094	$238,703	$239,900	$229,976	$2,781,713
Volumetric Distribution Charge	351,484	641,566	815,546	807,465	703,590	537,295	340,753	141,336	73,435	65,490	77,026	157,904	4,712,891
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	28,970	43,447	52,180	51,772	46,627	38,347	28,657	18,803	15,476	15,210	15,846	19,394	374,730
Total Base Non Gas Cost Rate Revenue	$608,377	$912,382	$1,095,772	$1,087,222	$979,171	$805,283	$601,799	$394,873	$325,006	$319,403	$332,772	$407,274	$7,869,334
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$52,857	$96,481	$122,645	$121,429	$105,808	$80,800	$51,244	$21,255	$11,043	$9,849	$11,583	$23,746	$708,740
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$52,857	$96,481	$122,645	$121,429	$105,808	$80,800	$51,244	$21,255	$11,043	$9,849	$11,583	$23,746	$708,740
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($1,630)	($2,444)	($2,935)	($2,912)	($2,623)	($2,157)	($1,612)	($1,058)	($871)	($856)	($891)	($1,425)	($21,414)
Total Revenues	$659,604	$1,006,419	$1,215,482	$1,205,739	$1,082,356	$883,926	$651,431	$415,070	$335,178	$328,396	$343,464	$429,595	$8,556,660
Unit Margin ($/Mcf)	$5.1253	$4.2110	$3.9785	$3.9870	$4.1209	$4.4380	$5.2296	$8.2729	$13.1051	$14.4416	$12.7927	$7.6374	$4.9443

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Current Rates)

Residential MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	460	463	463	464	466	468	467	468	509	508	506	459	5,701
Total Volume	7,987	14,928	20,246	21,184	18,655	14,194	8,410	3,173	1,249	1,005	1,345	2,814	115,189
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	6,439	6,478	6,484	6,501	6,519	6,554	6,539	6,549	7,121	7,118	7,090	6,426	79,818
Volumetric Distribution Charge	23,650	44,204	59,949	62,727	55,239	42,030	24,902	9,396	3,697	2,976	3,983	8,333	341,087
DSIC - Distribution System Improvement Charge	1,504	2,534	3,322	3,461	3,088	2,429	1,572	797	541	505	554	738	21,045
Total Base Non Gas Cost Rate Revenue	$31,593	$53,216	$69,754	$72,690	$64,846	$51,013	$33,013	$16,743	$11,359	$10,599	$11,627	$15,497	$441,950
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49001
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$3,914	$7,315	$9,920	$10,380	$9,141	$6,955	$4,121	$1,555	$612	$493	$659	$1,379	$56,444
OPEB Surcredit - Rider I	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Gas Cost Revenues	$3,914	$7,315	$9,920	$10,380	$9,141	$6,955	$4,121	$1,555	$612	$493	$659	$1,379	$56,444
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($85)	($143)	($187)	($195)	($174)	($137)	($88)	($45)	($30)	($28)	($31)	($54)	($1,197)
Total Revenues	$35,422	$60,388	$79,487	$82,875	$73,813	$57,831	$37,046	$18,253	$11,941	$11,064	$12,255	$16,822	$497,197
Unit Margin ($/Mcf)	$3.9556	$3.5648	$3.4454	$3.4314	$3.4761	$3.5940	$3.9256	$5.2761	$9.0971	$10.5441	$8.6434	$5.5068	$3.8367

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

Small Commercial < 250 Sales	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	8,081	8,224	8,307	8,335	8,309	8,293	8,250	8,175	8,087	8,041	8,029	8,037	98,168
Total Volume	65,148	131,357	171,832	171,148	146,590	107,838	62,353	18,218	2,915	1,175	3,791	21,108	903,474
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$218,187	$222,048	$224,289	$225,045	$224,343	$223,911	$222,750	$220,725	$218,349	$217,107	$216,783	$216,999	$2,650,536
Volumetric Distribution Charge	149,801	302,043	395,111	393,538	337,069	247,964	143,375	41,890	6,702	2,702	8,717	48,537	2,077,448
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	1,159	2,338	3,058	3,046	2,609	1,919	1,110	324	52	21	67	376	16,078
Rider H - Gas Procurement Charge	7,485	15,093	19,744	19,665	16,843	12,391	7,164	2,093	335	135	436	2,425	103,809
DSIC - Distribution System Improvement Charge	18,832	27,076	32,110	32,065	29,043	24,309	18,720	13,252	11,272	10,998	11,300	13,417	242,394
Total Base Non Gas Cost Rate Revenue	$395,464	$568,598	$674,311	$673,358	$609,907	$510,493	$393,119	$278,284	$236,710	$230,963	$237,303	$281,754	$5,090,265
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$29,010	$58,493	$76,517	$76,212	$65,277	$48,020	$27,766	$8,112	$1,298	$523	$1,688	$9,400	$402,316
Natural Gas Supply Charge ($/Mcf) - Rider A	327,915	661,174	864,900	861,456	737,846	542,794	313,849	91,698	14,672	5,914	19,081	106,247	$4,547,546
Gas Adjustment Charge ($/Mcf) - Rider A	13,264	26,744	34,985	34,846	29,846	21,956	12,695	3,709	593	239	772	4,298	$183,947
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$370,189	$746,411	$976,402	$972,514	$832,969	$612,770	$354,310	$103,519	$16,563	$6,676	$21,541	$119,945	$5,133,809
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($1,059)	($1,523)	($1,806)	($1,804)	($1,634)	($1,367)	($1,053)	($745)	($634)	($619)	($636)	($986)	($13,866)
Total Revenues	$764,594	$1,313,486	$1,648,907	$1,644,068	$1,441,242	$1,121,896	$746,376	$381,058	$252,639	$237,020	$258,208	$400,713	$10,210,208
Unit Margin ($/Mcf)	$6.0703	$4.3286	$3.9242	$3.9344	$4.1606	$4.7339	$6.3047	$15.2753	$81.2083	$196.5826	$62.5990	$13.3479	$5.6341

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

Small Commercial < 250 SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	625	618	614	605	582	583	581	578	578	571	569	561	7,065
Total Volume	5,379	10,457	13,430	13,137	10,868	8,046	4,692	1,429	293	161	354	1,622	69,868
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$16,875	$16,686	$16,578	$16,335	$15,714	$15,741	$15,687	$15,606	$15,606	$15,417	$15,363	$15,147	$190,755
Volumetric Distribution Charge	12,368	24,044	30,881	30,207	24,990	18,500	10,790	3,287	675	371	815	3,729	160,656
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	1,462	2,037	2,373	2,327	2,035	1,712	1,324	945	814	789	809	944	17,571
Total Base Non Gas Cost Rate Revenue	$30,705	$42,767	$49,832	$48,869	$42,739	$35,953	$27,800	$19,838	$17,095	$16,577	$16,987	$19,819	$368,981
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44531
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$2,395	$4,656	$5,980	$5,850	$4,839	$3,583	$2,090	$637	$131	$72	$158	$722	$31,113
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$2,395	$4,656	$5,980	$5,850	$4,839	$3,583	$2,090	$637	$131	$72	$158	$722	$31,113
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($82)	($115)	($133)	($131)	($114)	($96)	($74)	($53)	($46)	($44)	($45)	($69)	($1,002)
Total Revenues	$33,018	$47,308	$55,679	$54,588	$47,464	$39,440	$29,816	$20,422	$17,180	$16,605	$17,100	$20,472	$399,092
Unit Margin ($/Mcf)	$5.7085	$4.0899	$3.7105	$3.7200	$3.9326	$4.4687	$5.9246	$13.8773	$58.2727	$102.7975	$47.9319	$12.2225	$5.2811

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

Small Commercial < 250 MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	1,089	1,096	1,106	1,109	1,092	1,098	1,103	1,109	1,110	1,120	1,122	1,128	13,282
Total Volume	9,121	19,400	29,489	31,401	24,933	16,910	7,855	3,138	1,971	1,502	1,995	3,489	151,202
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	29,403	29,592	29,862	29,943	29,484	29,646	29,781	29,943	29,970	30,240	30,294	30,456	358,614
Volumetric Distribution Charge	20,972	44,608	67,806	72,204	57,330	38,882	18,061	7,214	4,532	3,455	4,586	8,024	347,675
DSIC - Distribution System Improvement Charge	2,519	3,710	4,883	5,107	4,341	3,426	2,392	1,858	1,725	1,685	1,744	1,924	35,314
Total Base Non Gas Cost Rate Revenue	$52,894	$77,910	$102,552	$107,254	$91,155	$71,955	$50,235	$39,015	$36,227	$35,380	$36,624	$40,404	$741,603
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$4,469	$9,506	$14,449	$15,387	$12,217	$8,286	$3,849	$1,537	$966	$736	$977	$1,710	$74,089
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$4,469	$9,506	$14,449	$15,387	$12,217	$8,286	$3,849	$1,537	$966	$736	$977	$1,710	$74,089
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($142)	($209)	($275)	($287)	($244)	($193)	($135)	($105)	($97)	($95)	($98)	($141)	($2,021)
Total Revenues	$57,221	$87,207	$116,726	$122,354	$103,128	$80,048	$53,949	$40,447	$37,096	$36,021	$37,503	$41,973	$813,671
Unit Margin ($/Mcf)	$5.7994	$4.0160	$3.4777	$3.4156	$3.6560	$4.2552	$6.3954	$12.4350	$18.3817	$23.5474	$18.3622	$11.5787	$4.9047

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

Small Commercial > 250 Sales	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	2,671	2,690	2,702	2,712	2,725	2,736	2,738	2,721	2,711	2,700	2,697	2,701	32,504
Total Volume	92,983	170,680	217,485	216,896	189,376	144,230	90,416	37,383	18,902	16,708	19,846	40,955	1,255,860
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$98,827	$99,530	$99,974	$100,344	$100,825	$101,232	$101,306	$100,677	$100,307	$99,900	$99,789	$99,937	$1,202,648
Volumetric Distribution Charge	191,126	350,834	447,040	445,831	389,262	296,465	185,850	76,840	38,852	34,344	40,793	84,183	2,581,421
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	1,655	3,037	3,870	3,860	3,370	2,567	1,609	665	336	297	353	729	22,348
Rider H - Gas Procurement Charge	10,684	19,611	24,989	24,921	21,759	16,572	10,389	4,295	2,172	1,920	2,280	4,706	144,298
DSIC - Distribution System Improvement Charge	15,115	23,651	28,794	28,748	25,761	20,842	14,958	9,124	7,083	6,823	7,161	9,478	197,536
Total Base Non Gas Cost Rate Revenue	$317,406	$496,663	$604,667	$603,704	$540,978	$437,678	$314,112	$191,601	$148,751	$143,284	$150,376	$199,032	$4,148,251
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$41,405	$76,004	$96,846	$96,584	$84,329	$64,226	$40,262	$16,646	$8,417	$7,440	$8,837	$18,237	$559,233
Natural Gas Supply Charge ($/Mcf) - Rider A	468,020	859,103	1,094,688	1,091,727	953,205	725,968	455,101	188,162	95,139	84,100	99,891	206,143	6,321,247
Gas Adjustment Charge ($/Mcf) - Rider A	18,931	34,751	44,280	44,160	38,557	29,365	18,409	7,611	3,848	3,402	4,041	8,338	255,693
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$528,356	$969,858	$1,235,814	$1,232,471	$1,076,091	$819,559	$513,772	$212,419	$107,404	$94,942	$112,769	$232,718	$7,136,173
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($850)	($1,330)	($1,620)	($1,617)	($1,449)	($1,172)	($841)	($513)	($398)	($384)	($403)	($697)	($11,274)
Total Revenues	$844,912	$1,465,191	$1,838,861	$1,834,558	$1,615,620	$1,256,065	$827,043	$403,507	$255,757	$237,842	$262,742	$431,053	$11,273,150
Unit Margin ($/Mcf)	$3.4136	$2.9099	$2.7803	$2.7834	$2.8566	$3.0346	$3.4741	$5.1254	$7.8697	$8.5756	$7.5773	$4.8598	$3.3031

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Current Rates)

Small Commercial > 250 SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	254	251	241	237	237	233	227	224	225	227	227	223	2,806
Total Volume	8,914	15,660	18,956	18,517	16,151	12,150	7,571	3,350	1,913	1,762	2,016	3,641	110,600
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$9,398	$9,287	$8,917	$8,769	$8,769	$8,621	$8,399	$8,288	$8,325	$8,399	$8,399	$8,251	$103,822
Volumetric Distribution Charge	18,322	32,190	38,963	38,062	33,198	24,975	15,563	6,886	3,932	3,622	4,143	7,483	227,339
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	1,386	2,074	2,394	2,342	2,098	1,680	1,198	759	613	601	627	787	16,558
Total Base Non Gas Cost Rate Revenue	$29,106	$43,551	$50,274	$49,172	$44,066	$35,276	$25,160	$15,933	$12,870	$12,622	$13,169	$16,521	$347,719
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44532
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$3,969	$6,974	$8,441	$8,246	$7,192	$5,411	$3,371	$1,492	$852	$785	$898	$1,621	$49,252
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$3,969	$6,974	$8,441	$8,246	$7,192	$5,411	$3,371	$1,492	$852	$785	$898	$1,621	$49,252
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($78)	($117)	($135)	($132)	($118)	($94)	($67)	($43)	($34)	($34)	($35)	($58)	($945)
Total Revenues	$32,997	$50,408	$58,580	$57,286	$51,140	$40,593	$28,464	$17,382	$13,688	$13,373	$14,032	$18,084	$396,026
Unit Margin ($/Mcf)	$3.2653	$2.7809	$2.6522	$2.6555	$2.7284	$2.9033	$3.3231	$4.7560	$6.7282	$7.1634	$6.5333	$4.5380	$3.1439

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

Small Commercial > 250 MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	1,142	1,146	1,148	1,145	1,160	1,169	1,171	1,168	1,173	1,177	1,178	1,176	13,953
Total Volume	49,398	89,971	114,236	113,164	99,692	76,312	48,021	20,148	10,458	9,370	11,078	22,367	664,215
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	42,254	42,402	42,476	42,365	42,920	43,253	43,327	43,216	43,401	43,549	43,586	43,512	516,261
Volumetric Distribution Charge	101,537	184,936	234,812	232,609	204,917	156,858	98,707	41,415	21,496	19,260	22,772	45,975	1,365,294
DSIC - Distribution System Improvement Charge	7,190	11,367	13,864	13,749	12,392	10,006	7,102	4,232	3,245	3,140	3,318	4,474	94,078
Total Base Non Gas Cost Rate Revenue	$150,980	$238,705	$291,152	$288,723	$260,229	$210,117	$149,136	$88,862	$68,142	$65,950	$69,675	$93,962	$1,975,632
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$24,205	$44,086	$55,976	$55,450	$48,849	$37,393	$23,530	$9,873	$5,124	$4,591	$5,428	$10,960	$325,465
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$24,205	$44,086	$55,976	$55,450	$48,849	$37,393	$23,530	$9,873	$5,124	$4,591	$5,428	$10,960	$325,465
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($404)	($639)	($780)	($773)	($697)	($563)	($399)	($238)	($183)	($177)	($187)	($329)	($5,369)
Total Revenues	$174,781	$282,152	$346,348	$343,400	$308,381	$246,947	$172,267	$98,497	$73,083	$70,364	$74,916	$104,593	$2,295,728
Unit Margin ($/Mcf)	$3.0564	$2.6531	$2.5487	$2.5514	$2.6103	$2.7534	$3.1056	$4.4104	$6.5159	$7.0383	$6.2893	$4.2009	$2.9744

National Fuel Gas Distribution Corporation
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Detailed Billed Revenue Workpapers (Current Rates)

Large Commercial	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	429	433	439	442	440	432	431	422	423	423	427	427	5,168
Total Volume	49,963	88,907	118,285	124,667	107,462	83,890	51,231	27,893	20,952	19,208	6,040	22,451	720,949
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$64,779	$65,383	$66,289	$66,742	$66,440	$65,232	$65,081	$63,722	$63,873	$63,873	$64,477	$64,477	$780,368
Volumetric Distribution Charge	83,048	147,780	196,614	207,221	178,623	139,443	85,155	46,364	34,827	31,928	10,040	37,318	1,198,361
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	889	1,582	2,105	2,218	1,912	1,493	912	496	373	342	107	400	12,830
Rider H - Gas Procurement Charge	5,741	10,215	13,591	14,324	12,347	9,639	5,886	3,205	2,407	2,207	694	2,580	82,837
DSIC - Distribution System Improvement Charge	7,723	11,248	13,930	14,525	12,966	10,790	7,852	5,689	5,074	4,917	3,766	5,239	103,720
Total Base Non Gas Cost Rate Revenue	$162,180	$236,209	$292,529	$305,031	$272,289	$226,597	$164,886	$119,477	$106,554	$103,267	$79,084	$110,013	$2,178,116
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$22,248	$39,590	$52,673	$55,514	$47,853	$37,356	$22,813	$12,421	$9,330	$8,553	$2,690	$9,998	$321,039
Natural Gas Supply Charge ($/Mcf) - Rider A	251,483	447,502	595,378	627,497	540,898	422,254	257,864	140,398	105,461	96,683	30,402	113,006	3,628,826
Gas Adjustment Charge ($/Mcf) - Rider A	10,172	18,101	24,083	25,382	21,879	17,080	10,431	5,679	4,266	3,911	1,230	4,571	146,785
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$283,903	$505,193	$672,134	$708,393	$610,630	$476,690	$291,108	$158,498	$119,057	$109,147	$34,322	$127,575	$4,096,650
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($434)	($633)	($784)	($817)	($729)	($607)	($442)	($320)	($285)	($277)	($212)	($385)	($5,925)
Total Revenues	$445,649	$740,769	$963,879	$1,012,607	$882,190	$702,680	$455,552	$277,655	$225,326	$212,137	$113,194	$237,203	$6,268,841
Unit Margin ($/Mcf)	$3.2460	$2.6568	$2.4731	$2.4468	$2.5338	$2.7011	$3.2185	$4.2834	$5.0856	$5.3762	$13.0935	$4.9001	$3.0212

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

Large Commercial SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	48	48	45	44	42	44	48	48	48	48	49	48	560
Total Volume	6,218	8,999	12,023	11,320	10,045	7,674	5,070	2,912	1,938	1,723	2,344	2,779	73,045
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$7,248	$7,248	$6,795	$6,644	$6,342	$6,644	$7,248	$7,248	$7,248	$7,248	$7,399	$7,248	$84,560
Volumetric Distribution Charge	10,336	14,958	19,984	18,817	16,697	12,756	8,427	4,840	3,221	2,863	3,896	4,619	121,415
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	879	1,110	1,339	1,273	1,152	970	784	604	523	506	565	593	10,299
Total Base Non Gas Cost Rate Revenue	$18,463	$23,316	$28,118	$26,734	$24,191	$20,370	$16,459	$12,693	$10,993	$10,617	$11,860	$12,461	$216,274
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$2,769	$4,007	$5,354	$5,041	$4,473	$3,417	$2,258	$1,297	$863	$767	$1,044	$1,237	$32,527
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$2,769	$4,007	$5,354	$5,041	$4,473	$3,417	$2,258	$1,297	$863	$767	$1,044	$1,237	$32,527
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($49)	($62)	($75)	($72)	($65)	($55)	($44)	($34)	($29)	($28)	($32)	($44)	($589)
Total Revenues	$21,183	$27,261	$33,397	$31,703	$28,599	$23,732	$18,673	$13,956	$11,827	$11,356	$12,872	$13,654	$248,212
Unit Margin ($/Mcf)	$2.9692	$2.5910	$2.3388	$2.3616	$2.4082	$2.6543	$3.2464	$4.3588	$5.6724	$6.1632	$5.0596	$4.4839	$2.9608

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

Large Commercial MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	724	726	728	731	726	728	729	728	723	727	732	728	8,730
Total Volume	176,681	297,655	393,301	427,544	374,958	316,259	210,251	122,784	79,620	72,567	78,823	94,556	2,644,998
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	109,324	109,626	109,928	110,381	109,626	109,928	110,079	109,928	109,173	109,777	110,532	109,928	1,318,230
Volumetric Distribution Charge	293,679	494,762	653,744	710,664	623,255	525,686	349,479	204,091	132,345	120,621	131,020	157,171	4,396,516
DSIC - Distribution System Improvement Charge	20,150	30,219	38,184	41,052	36,644	31,781	22,978	15,701	12,076	11,520	12,078	13,355	285,737
Total Base Non Gas Cost Rate Revenue	$423,153	$634,607	$801,856	$862,097	$769,525	$667,395	$482,536	$329,720	$253,593	$241,918	$253,630	$280,454	$6,000,484
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$86,574	$145,851	$192,717	$209,497	$183,729	$154,967	$103,023	$60,164	$39,014	$35,558	$38,623	$46,332	$1,296,049
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$86,574	$145,851	$192,717	$209,497	$183,729	$154,967	$103,023	$60,164	$39,014	$35,558	$38,623	$46,332	$1,296,049
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($1,133)	($1,700)	($2,148)	($2,309)	($2,061)	($1,788)	($1,292)	($883)	($679)	($648)	($679)	($982)	($16,302)
Total Revenues	$508,594	$778,758	$992,425	$1,069,285	$951,193	$820,574	$584,267	$389,001	$291,928	$276,828	$291,574	$325,804	$7,280,231
Unit Margin ($/Mcf)	$2.3950	$2.1320	$2.0388	$2.0164	$2.0523	$2.1103	$2.2950	$2.6854	$3.1850	$3.3337	$3.2177	$2.9660	$2.2686

National Fuel Gas Distribution Corporation
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Detailed Billed Revenue Workpapers (Current Rates)

Large Commercial DMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	11	11	11	11	11	11	11	11	11	11	11	11	132
Total Volume	65,881	67,309	73,313	81,879	73,457	66,268	54,419	47,325	43,823	43,997	48,110	50,901	716,683
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	19,932
Volumetric Distribution Charge	109,507	111,881	121,862	136,099	122,099	110,151	90,456	78,664	72,843	73,132	79,969	84,607	1,191,270
DSIC - Distribution System Improvement Charge	5,558	5,677	6,176	6,888	6,188	5,591	4,606	4,016	3,725	3,740	4,081	4,313	60,560
Total Base Non Gas Cost Rate Revenue	$116,727	$119,219	$129,699	$144,648	$129,949	$117,403	$96,723	$84,341	$78,229	$78,532	$85,711	$90,582	$1,271,762
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($313)	($319)	($347)	($387)	($348)	($314)	($259)	($226)	($210)	($210)	($230)	($317)	($3,480)
Total Revenues	$116,414	$118,900	$129,352	$144,261	$129,601	$117,089	$96,464	$84,115	$78,019	$78,322	$85,481	$90,265	$1,268,282
Unit Margin ($/Mcf)	$1.7718	$1.7712	$1.7691	$1.7666	$1.7691	$1.7716	$1.7774	$1.7822	$1.7851	$1.7850	$1.7816	$1.7796	$1.7745

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Natural Gas Vehicles	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	7	7	7	7	7	7	7	7	7	7	7	7	84
Total Volume	4,885	9,917	13,001	12,472	10,628	8,616	5,145	1,694	671	438	591	1,977	70,034
Base Non Gas Cost Rate:													
Volumetric Distribution Charge	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Volumetric Distribution Charge	8,742	17,747	23,267	22,319	19,020	15,420	9,208	3,032	1,200	784	1,057	3,538	125,333
DSIC - Distribution System Improvement Charge	437	887	1,163	1,116	951	771	460	152	60	39	53	177	6,267
Total Base Non Gas Cost Rate Revenue	$9,179	$18,634	$24,430	$23,435	$19,971	$16,191	$9,668	$3,184	$1,260	$824	$1,110	$3,714	$131,600
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03339
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$2,175	$4,416	$5,789	$5,554	$4,733	$3,837	$2,291	$754	$299	$195	$263	$880	$31,186
Natural Gas Supply Charge ($/Mcf) - Rider A	24,587	49,914	65,439	62,775	53,495	43,370	25,897	8,528	3,376	2,206	2,972	9,950	352,509
Gas Adjustment Charge ($/Mcf) - Rider A	995	2,019	2,647	2,539	2,164	1,754	1,048	345	137	89	120	402	14,259
Total Gas Cost Revenues	$27,757	$56,349	$73,875	$70,868	$60,392	$48,961	$29,236	$9,627	$3,812	$2,490	$3,355	$11,232	$397,954
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($25)	($50)	($65)	($63)	($53)	($43)	($26)	($9)	($3)	($2)	($3)	($13)	($355)
Total Revenues	$36,911	$74,933	$98,240	$94,240	$80,310	$65,109	$38,878	$12,802	$5,069	$3,312	$4,462	$14,933	$529,199
Unit Margin ($/Mcf)	$1.8791	$1.8791	$1.8791	$1.8791	$1.8791	$1.8791	$1.8791	$1.8791	$1.8791	$1.8791	$1.8791	$1.8791	$1.8791

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Small Public Authority < 250 Sales	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	366	383	380	364	365	366	363	361	361	356	352	351	4,368
Total Volume	11,616	9,486	11,103	8,632	9,118	9,174	9,070	8,700	9,248	8,259	25,081	12,968	132,454
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$9,882	$10,341	$10,260	$9,828	$9,855	$9,882	$9,801	$9,747	$9,747	$9,612	$9,504	$9,477	$117,936
Volumetric Distribution Charge	26,711	21,811	25,531	19,847	20,966	21,094	20,855	20,005	21,264	18,990	57,672	29,819	304,565
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	207	169	198	154	162	163	161	155	165	147	446	231	2,357
Rider H - Gas Procurement Charge	1,335	1,090	1,276	992	1,048	1,054	1,042	1,000	1,063	949	2,882	1,490	15,219
DSIC - Distribution System Improvement Charge	1,907	1,671	1,863	1,541	1,602	1,610	1,593	1,545	1,612	1,485	3,525	2,051	22,004
Total Base Non Gas Cost Rate Revenue	$40,041	$35,081	$39,128	$32,362	$33,632	$33,803	$33,453	$32,452	$33,850	$31,182	$74,030	$43,068	$462,081
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44531
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$5,173	$4,224	$4,944	$3,844	$4,060	$4,085	$4,039	$3,874	$4,118	$3,678	$11,169	$5,775	$58,983
Natural Gas Supply Charge ($/Mcf) - Rider A	58,470	47,745	55,888	43,446	45,894	46,174	45,652	43,791	46,548	41,569	126,245	65,274	666,696
Gas Adjustment Charge ($/Mcf) - Rider A	2,365	1,931	2,261	1,757	1,856	1,868	1,847	1,771	1,883	1,681	5,107	2,640	26,967
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$66,008	$53,900	$63,093	$49,047	$51,810	$52,127	$51,538	$49,436	$52,549	$46,928	$142,521	$73,689	$752,646
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.28%
Rider B - State Tax Adjustment	($107)	($94)	($105)	($87)	($90)	($91)	($90)	($87)	($91)	($84)	($198)	($151)	($1,275)
Total Revenues	$105,942	$88,887	$102,116	$81,322	$85,352	$85,839	$84,901	$81,801	$86,308	$78,026	$216,353	$116,606	$1,213,452
Unit Margin ($/Mcf)	$3.4469	$3.6984	$3.5239	$3.7492	$3.6886	$3.6848	$3.6883	$3.7301	$3.6604	$3.7758	$2.9516	$3.3210	$3.4886

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Small Public Authority < 250 SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	23	23	23	23	23	23	23	23	23	23	23	23	276
Total Volume	156	337	472	473	407	291	135	66	76	18	37	55	2,523
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$621	$621	$621	$621	$621	$621	$621	$621	$621	$621	$621	$621	$7,452
Volumetric Distribution Charge	358	774	1,086	1,087	937	669	309	153	176	40	86	125	5,801
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	49	70	85	85	78	65	47	39	40	33	35	37	663
Total Base Non Gas Cost Rate Revenue	$1,028	$1,465	$1,793	$1,793	$1,636	$1,355	$977	$813	$836	$694	$742	$784	$13,916
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44515
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$69	$150	$210	$210	$181	$130	$60	$30	$34	$8	$17	$24	$1,123
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$69	$150	$210	$210	$181	$130	$60	$30	$34	$8	$17	$24	$1,123
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.28%
Rider B - State Tax Adjustment	($3)	($4)	($5)	($5)	($4)	($4)	($3)	($2)	($2)	($2)	($2)	($3)	($39)
Total Revenues	$1,094	$1,611	$1,998	$1,998	$1,813	$1,481	$1,034	$841	$868	$700	$757	$805	$15,000
Unit Margin ($/Mcf)	$6.6031	$4.3507	$3.7946	$3.7943	$4.0145	$4.6543	$7.2619	$12.2240	$10.9495	$39.5527	$19.8590	$14.3757	$5.5160

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Small Public Authority < 250 MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	217	212	214	230	227	228	228	232	231	236	239	239	2,733
Total Volume	1,999	4,371	6,274	6,834	5,943	4,032	2,068	926	439	327	520	974	34,706
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	5,859	5,724	5,778	6,210	6,129	6,156	6,156	6,264	6,237	6,372	6,453	6,453	73,791
Volumetric Distribution Charge	4,596	10,050	14,426	15,713	13,666	9,271	4,754	2,128	1,010	753	1,197	2,239	79,802
DSIC - Distribution System Improvement Charge	523	789	1,010	1,096	990	771	546	420	362	356	382	435	7,680
Total Base Non Gas Cost Rate Revenue	$10,978	$16,562	$21,214	$23,019	$20,785	$16,198	$11,456	$8,812	$7,609	$7,481	$8,032	$9,127	$161,273
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.48998
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$979	$2,142	$3,074	$3,348	$2,912	$1,976	$1,013	$454	$215	$160	$255	$477	$17,005
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$979	$2,142	$3,074	$3,348	$2,912	$1,976	$1,013	$454	$215	$160	$255	$477	$17,005
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($29)	($44)	($57)	($62)	($56)	($43)	($31)	($24)	($20)	($20)	($22)	($32)	($440)
Total Revenues	$11,928	$18,660	$24,231	$26,305	$23,641	$18,131	$12,438	$9,242	$7,804	$7,621	$8,265	$9,572	$177,838
Unit Margin ($/Mcf)	$5.4923	$3.7895	$3.3814	$3.3686	$3.4972	$4.0176	$5.5407	$9.5198	$17.3273	$22.8469	$15.4324	$9.3725	$4.6469

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Small Public Authority > 250 Sales	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	105	111	108	99	97	98	101	96	100	93	89	89	1,186
Total Volume	2,345	5,204	7,576	7,325	6,254	4,323	1,910	723	498	262	490	791	37,700
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$3,885	$4,107	$3,996	$3,663	$3,589	$3,626	$3,737	$3,552	$3,700	$3,441	$3,293	$3,293	$43,882
Volumetric Distribution Charge	4,820	10,697	15,572	15,056	12,854	8,885	3,925	1,486	1,025	539	1,008	1,627	77,492
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	42	93	135	130	111	77	34	13	9	5	9	14	671
Rider H - Gas Procurement Charge	269	598	870	842	719	497	219	83	57	30	56	91	4,332
DSIC - Distribution System Improvement Charge	451	775	1,029	985	864	654	396	257	240	201	218	251	6,319
Total Base Non Gas Cost Rate Revenue	$9,467	$16,270	$21,602	$20,676	$18,137	$13,739	$8,311	$5,390	$5,030	$4,215	$4,584	$5,276	$132,696
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44528
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03339
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20355
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$1,044	$2,317	$3,373	$3,262	$2,785	$1,925	$850	$322	$222	$117	$218	$352	$16,787
Natural Gas Supply Charge ($/Mcf) - Rider A	11,803	26,195	38,131	36,869	31,477	21,757	9,611	3,638	2,509	1,319	2,467	3,983	189,759
Gas Adjustment Charge ($/Mcf) - Rider A	477	1,060	1,542	1,491	1,273	880	389	147	101	53	100	161	7,674
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$13,324	$29,572	$43,046	$41,622	$35,535	$24,562	$10,850	$4,107	$2,832	$1,489	$2,785	$4,496	$214,220
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($25)	($44)	($58)	($55)	($49)	($37)	($22)	($14)	($13)	($11)	($12)	($18)	($358)
Total Revenues	$22,766	$45,798	$64,590	$62,243	$53,623	$38,264	$19,139	$9,483	$7,849	$5,693	$7,357	$9,754	$346,558
Unit Margin ($/Mcf)	$4.0372	$3.1262	$2.8515	$2.8227	$2.9002	$3.1784	$4.3525	$7.4581	$10.0913	$16.0870	$9.3509	$6.6670	$3.5198

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Current Rates)

Small Public Authority > 250 SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	19	19	19	19	19	19	19	19	19	19	19	19	228
Total Volume	652	1,384	1,959	1,948	1,696	1,172	520	244	218	44	70	213	10,118
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$703	$703	$703	$703	$703	$703	$703	$703	$703	$703	$703	$703	$8,436
Volumetric Distribution Charge	1,340	2,844	4,027	4,003	3,487	2,408	1,068	501	449	91	143	438	20,798
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	102	177	237	235	210	156	89	60	58	40	42	57	1,462
Total Base Non Gas Cost Rate Revenue	$2,145	$3,724	$4,967	$4,942	$4,400	$3,267	$1,860	$1,264	$1,209	$833	$888	$1,198	$30,695
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44514
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$290	$616	$872	$867	$755	$522	$231	$108	$97	$20	$31	$95	$4,504
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$290	$616	$872	$867	$755	$522	$231	$108	$97	$20	$31	$95	$4,504
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($6)	($10)	($13)	($13)	($12)	($9)	($5)	($3)	($3)	($2)	($2)	($4)	($83)
Total Revenues	$2,429	$4,330	$5,826	$5,795	$5,143	$3,780	$2,086	$1,368	$1,303	$851	$917	$1,288	$35,116
Unit Margin ($/Mcf)	$3.2908	$2.6918	$2.5350	$2.5373	$2.5934	$2.7883	$3.5786	$5.1889	$5.5405	$18.9148	$12.7784	$5.6260	$3.0337

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

Small Public Authority > 250 MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	225	216	220	229	233	230	229	235	228	235	239	239	2,758
Total Volume	9,091	16,697	21,833	22,587	19,855	14,616	8,728	3,121	1,012	795	1,181	3,597	123,113
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	8,325	7,992	8,140	8,473	8,621	8,510	8,473	8,695	8,436	8,695	8,843	8,843	102,046
Volumetric Distribution Charge	18,687	34,320	44,878	46,428	40,813	30,043	17,940	6,415	2,079	1,635	2,428	7,394	253,059
DSIC - Distribution System Improvement Charge	1,351	2,116	2,651	2,745	2,472	1,928	1,321	755	526	516	564	812	17,755
Total Base Non Gas Cost Rate Revenue	$28,362	$44,427	$55,669	$57,646	$51,906	$40,480	$27,734	$15,865	$11,041	$10,846	$11,835	$17,049	$372,861
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49001
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$4,455	$8,181	$10,698	$11,068	$9,729	$7,162	$4,277	$1,529	$496	$390	$579	$1,763	$60,327
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$4,455	$8,181	$10,698	$11,068	$9,729	$7,162	$4,277	$1,529	$496	$390	$579	$1,763	$60,327
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($76)	($119)	($149)	($154)	($139)	($108)	($74)	($42)	($30)	($29)	($32)	($60)	($1,012)
Total Revenues	$32,741	$52,489	$66,218	$68,560	$61,496	$47,534	$31,937	$17,352	$11,507	$11,207	$12,382	$18,752	$432,176
Unit Margin ($/Mcf)	$3.1198	$2.6609	$2.5497	$2.5522	$2.6142	$2.7696	$3.1776	$5.0837	$10.9148	$13.6386	$10.0187	$4.7394	$3.0286

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

Large Public Authority Sales	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	32	31	31	30	30	30	30	29	36	32	29	30	370
Total Volume	3,721	7,798	9,827	8,942	7,526	5,604	3,355	937	153	54	179	1,024	49,118
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$4,832	$4,681	$4,681	$4,530	$4,530	$4,530	$4,530	$4,379	$5,436	$4,832	$4,379	$4,530	$55,870
Volumetric Distribution Charge	6,185	12,961	16,334	14,863	12,510	9,315	5,577	1,557	254	90	297	1,702	81,645
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	66	139	175	159	134	100	60	17	3	1	3	18	874
Rider H - Gas Procurement Charge	428	896	1,129	1,027	865	644	385	108	18	6	21	118	5,644
DSIC - Distribution System Improvement Charge	576	934	1,116	1,029	902	729	528	303	285	246	235	318	7,202
Total Base Non Gas Cost Rate Revenue	$12,086	$19,611	$23,435	$21,609	$18,941	$15,318	$11,079	$6,363	$5,995	$5,176	$4,935	$6,686	$151,234
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44531
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03341
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20361
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$1,657	$3,472	$4,376	$3,982	$3,351	$2,496	$1,494	$417	$68	$24	$80	$456	$21,873
Natural Gas Supply Charge ($/Mcf) - Rider A	18,728	39,249	49,462	45,008	37,883	28,208	16,887	4,714	768	273	900	5,153	247,233
Gas Adjustment Charge ($/Mcf) - Rider A	758	1,588	2,001	1,821	1,532	1,141	683	191	31	11	36	208	10,001
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$21,143	$44,309	$55,839	$50,811	$42,766	$31,845	$19,064	$5,322	$867	$308	$1,016	$5,817	$279,107
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($32)	($53)	($63)	($58)	($51)	($41)	($30)	($17)	($16)	($14)	($13)	($23)	($411)
Total Revenues	$33,197	$63,867	$79,211	$72,362	$61,656	$47,122	$30,113	$11,668	$6,846	$5,470	$5,938	$12,480	$429,930
Unit Margin ($/Mcf)	$3.2482	$2.5150	$2.3848	$2.4166	$2.5166	$2.7334	$3.3024	$6.7940	$39.3092	$95.5372	$27.6135	$6.5307	$3.0790

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Current Rates)

Large Public Authority SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	3	3	3	3	3	3	3	3	3	3	3	3	36
Total Volume	206	418	627	711	587	488	242	129	86	45	52	198	3,788
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$453	$453	$453	$453	$453	$453	$453	$453	$453	$453	$453	$453	$5,436
Volumetric Distribution Charge	343	695	1,042	1,181	976	810	403	215	142	74	86	330	6,297
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	40	57	75	82	71	63	43	33	30	26	27	39	587
Total Base Non Gas Cost Rate Revenue	$836	$1,206	$1,570	$1,716	$1,500	$1,327	$898	$701	$625	$554	$566	$822	$12,319
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44481
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$92	$186	$279	$316	$261	$217	$108	$57	$38	$20	$23	$88	$1,685
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$92	$186	$279	$316	$261	$217	$108	$57	$38	$20	$23	$88	$1,685
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.28%
Rider B - State Tax Adjustment	($2)	($3)	($4)	($5)	($4)	($4)	($2)	($2)	($2)	($1)	($2)	($3)	($34)
Total Revenues	$926	$1,389	$1,845	$2,027	$1,757	$1,540	$1,004	$756	$661	$573	$587	$907	$13,970
Unit Margin ($/Mcf)	$4.0506	$2.8821	$2.5042	$2.4148	$2.5556	$2.7208	$3.7095	$5.4301	$7.3031	$12.3941	$10.9366	$4.1435	$3.2521

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Current Rates)

Large Public Authority MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	283	282	283	284	282	282	284	284	276	281	283	283	3,387
Total Volume	114,221	201,498	272,378	311,441	275,885	245,756	163,015	88,379	44,323	37,724	38,690	50,458	1,843,767
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	42,733	42,582	42,733	42,884	42,582	42,582	42,884	42,884	41,676	42,431	42,733	42,733	511,437
Volumetric Distribution Charge	189,858	334,930	452,746	517,676	458,575	408,496	270,963	146,904	73,674	62,704	64,310	83,871	3,064,709
DSIC - Distribution System Improvement Charge	11,630	18,876	24,774	28,028	25,058	22,554	15,692	9,489	5,768	5,257	5,352	6,330	178,807
Total Base Non Gas Cost Rate Revenue	$244,220	$396,388	$520,253	$588,588	$526,215	$473,632	$329,540	$199,277	$121,118	$110,392	$112,396	$132,934	$3,754,954
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$55,968	$98,734	$133,465	$152,606	$135,183	$120,421	$79,877	$43,306	$21,718	$18,485	$18,958	$24,724	$903,445
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$55,968	$98,734	$133,465	$152,606	$135,183	$120,421	$79,877	$43,306	$21,718	$18,485	$18,958	$24,724	$903,445
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($654)	($1,062)	($1,394)	($1,577)	($1,409)	($1,269)	($883)	($534)	($324)	($296)	($301)	($465)	($10,168)
Total Revenues	$299,534	$494,060	$652,324	$739,617	$659,989	$592,784	$408,534	$242,049	$142,512	$128,581	$131,053	$157,193	$4,648,231
Unit Margin ($/Mcf)	$2.1381	$1.9672	$1.9100	$1.8899	$1.9074	$1.9272	$2.0215	$2.2548	$2.7326	$2.9263	$2.9050	$2.6346	$2.0366

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Large Public Authority DMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	3	3	3	3	3	3	3	3	3	3	3	3	36
Total Volume	20,147	22,056	26,360	25,242	27,343	19,326	14,449	3,770	7,255	15,421	11,095	10,699	203,162
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	453	453	453	453	453	453	453	453	453	453	453	453	5,436
Volumetric Distribution Charge	33,488	36,661	43,816	41,957	45,449	32,123	24,017	6,266	12,060	25,633	18,442	17,784	337,695
DSIC - Distribution System Improvement Charge	1,697	1,856	2,213	2,120	2,295	1,629	1,223	336	626	1,304	945	912	17,157
Total Base Non Gas Cost Rate Revenue	$35,638	$38,970	$46,482	$44,530	$48,197	$34,205	$25,693	$7,055	$13,138	$27,390	$19,840	$19,149	$360,288
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($95)	($104)	($125)	($119)	($129)	($92)	($69)	($19)	($35)	($73)	($53)	($67)	($980)
Total Revenues	$35,543	$38,866	$46,357	$44,411	$48,068	$34,113	$25,624	$7,036	$13,103	$27,317	$19,787	$19,082	$359,308
Unit Margin ($/Mcf)	$1.7689	$1.7669	$1.7634	$1.7642	$1.7627	$1.7699	$1.7782	$1.8715	$1.8109	$1.7762	$1.7882	$1.7898	$1.7734

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Detailed Billed Revenue Workpapers (Current Rates)

SVIS Sales	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	125	128	127	129	131	131	129	127	125	125	124	124	1,525
Total Volume	2,913	8,338	11,665	13,202	10,070	6,980	3,442	1,295	630	303	596	759	60,192
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$10,250	$10,496	$10,414	$10,578	$10,742	$10,742	$10,578	$10,414	$10,250	$10,250	$10,168	$10,168	$125,050
Volumetric Distribution Charge	6,036	17,278	24,173	27,357	20,867	14,464	7,132	2,683	1,306	627	1,234	1,573	124,730
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	52	148	208	235	179	124	61	23	11	5	11	14	1,071
Rider H - Gas Procurement Charge	335	958	1,340	1,517	1,157	802	395	149	72	35	68	87	6,916
DSIC - Distribution System Improvement Charge	834	1,444	1,807	1,984	1,647	1,307	908	663	582	546	574	592	12,888
Total Base Non Gas Cost Rate Revenue	$17,506	$30,325	$37,942	$41,672	$34,593	$27,439	$19,075	$13,932	$12,221	$11,463	$12,055	$12,434	$270,656
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44531
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03339
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20361
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$1,297	$3,713	$5,195	$5,879	$4,484	$3,108	$1,533	$576	$281	$135	$265	$338	$26,804
Natural Gas Supply Charge ($/Mcf) - Rider A	14,661	41,969	58,717	66,451	50,687	35,133	17,323	6,516	3,172	1,523	2,998	3,821	302,971
Gas Adjustment Charge ($/Mcf) - Rider A	593	1,698	2,375	2,688	2,050	1,421	701	264	128	62	121	155	12,256
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$16,551	$47,380	$66,287	$75,018	$57,221	$39,662	$19,557	$7,356	$3,581	$1,720	$3,384	$4,314	$342,031
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($47)	($81)	($102)	($112)	($93)	($73)	($51)	($37)	($33)	($31)	($32)	($44)	($736)
Total Revenues	$34,010	$77,624	$104,127	$116,578	$91,721	$67,028	$38,581	$21,251	$15,769	$13,152	$15,407	$16,704	$611,951
Unit Margin ($/Mcf)	$6.0100	$3.6369	$3.2525	$3.1564	$3.4352	$3.9310	$5.5423	$10.7614	$19.3934	$37.8918	$20.2386	$16.3795	$4.4965

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SVIS SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	11	11	11	11	11	11	11	11	11	11	11	11	132
Total Volume	226	652	992	1,117	846	595	248	109	26	16	31	44	4,900
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$902	$902	$902	$902	$902	$902	$902	$902	$902	$902	$902	$902	$10,824
Volumetric Distribution Charge	468	1,351	2,055	2,314	1,753	1,233	514	225	55	32	64	91	10,155
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	68	113	148	161	133	107	71	56	48	47	48	50	1,049
Total Base Non Gas Cost Rate Revenue	$1,438	$2,365	$3,105	$3,377	$2,787	$2,242	$1,487	$1,183	$1,004	$981	$1,015	$1,042	$22,028
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44527
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$100	$290	$442	$497	$377	$265	$111	$48	$12	$7	$14	$19	$2,182
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$100	$290	$442	$497	$377	$265	$111	$48	$12	$7	$14	$19	$2,182
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($4)	($6)	($8)	($9)	($7)	($6)	($4)	($3)	($3)	($3)	($3)	($4)	($60)
Total Revenues	$1,534	$2,649	$3,539	$3,865	$3,157	$2,501	$1,594	$1,228	$1,013	$985	$1,026	$1,057	$24,150
Unit Margin ($/Mcf)	$6.3738	$3.6288	$3.1307	$3.0239	$3.2955	$3.7671	$5.9915	$10.8953	$38.1013	$63.0831	$32.7118	$23.8233	$4.4950

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SVIS MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	62	68	68	67	65	61	61	65	63	63	63	64	770
Total Volume	2,267	5,600	8,088	8,683	6,478	4,113	1,982	718	324	272	327	655	39,506
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	5,084	5,576	5,576	5,494	5,330	5,002	5,002	5,330	5,166	5,166	5,166	5,248	63,140
Volumetric Distribution Charge	4,698	11,605	16,759	17,992	13,424	8,524	4,107	1,488	671	563	677	1,358	81,865
DSIC - Distribution System Improvement Charge	489	859	1,117	1,174	938	676	455	341	292	286	292	330	7,250
Total Base Non Gas Cost Rate Revenue	$10,271	$18,040	$23,452	$24,660	$19,691	$14,202	$9,564	$7,159	$6,129	$6,015	$6,136	$6,936	$152,255
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.48998
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$1,111	$2,744	$3,963	$4,254	$3,174	$2,015	$971	$352	$159	$133	$160	$321	$19,357
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$1,111	$2,744	$3,963	$4,254	$3,174	$2,015	$971	$352	$159	$133	$160	$321	$19,357
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($28)	($48)	($63)	($66)	($53)	($38)	($26)	($19)	($16)	($16)	($16)	($24)	($413)
Total Revenues	$11,354	$20,736	$27,352	$28,848	$22,812	$16,179	$10,509	$7,492	$6,272	$6,132	$6,280	$7,233	$171,199
Unit Margin ($/Mcf)	$4.5306	$3.2213	$2.8997	$2.8402	$3.0397	$3.4527	$4.8260	$9.9707	$18.9190	$22.1538	$18.7702	$10.5849	$3.8540

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IVIS Sales	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	56	53	54	55	53	52	53	51	58	55	55	58	653
Total Volume	10,325	19,589	26,227	29,307	25,173	18,957	12,214	6,212	5,285	3,253	3,485	6,077	166,107
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$14,112	$13,356	$13,608	$13,860	$13,356	$13,104	$13,356	$12,852	$14,616	$13,860	$13,860	$14,616	$164,556
Volumetric Distribution Charge	13,781	26,145	35,006	39,116	33,598	25,302	16,302	8,292	7,054	4,342	4,652	8,112	221,703
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	184	349	467	522	448	337	217	111	94	58	62	108	2,956
Rider H - Gas Procurement Charge	1,186	2,251	3,014	3,367	2,892	2,178	1,403	714	607	374	400	698	19,086
DSIC - Distribution System Improvement Charge	1,463	2,105	2,605	2,843	2,515	2,046	1,564	1,098	1,119	932	949	1,177	20,415
Total Base Non Gas Cost Rate Revenue	$30,727	$44,206	$54,699	$59,708	$52,809	$42,967	$32,843	$23,066	$23,490	$19,566	$19,923	$24,711	$428,716
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$4,598	$8,723	$11,679	$13,050	$11,210	$8,442	$5,439	$2,766	$2,354	$1,449	$1,552	$2,706	$73,968
Natural Gas Supply Charge ($/Mcf) - Rider A	51,972	98,599	132,013	147,514	126,706	95,418	61,479	31,269	26,603	16,376	17,543	30,590	836,082
Gas Adjustment Charge ($/Mcf) - Rider A	2,102	3,988	5,340	5,967	5,125	3,860	2,487	1,265	1,076	662	710	1,237	33,819
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$58,672	$111,310	$149,032	$166,531	$143,041	$107,720	$69,405	$35,300	$30,033	$18,487	$19,805	$34,533	$943,869
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($82)	($118)	($147)	($160)	($141)	($115)	($88)	($62)	($63)	($52)	($53)	($86)	($1,167)
Total Revenues	$89,317	$155,398	$203,584	$226,079	$195,709	$150,572	$102,160	$58,304	$53,460	$38,001	$39,675	$59,158	$1,371,418
Unit Margin ($/Mcf)	$2.9758	$2.2567	$2.0856	$2.0373	$2.0979	$2.2666	$2.6889	$3.7130	$4.4444	$6.0138	$5.7162	$4.0660	$2.5810

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Detailed Billed Revenue Workpapers (Current Rates)

IVIS SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	3	3	3	3	3	3	3	3	3	3	3	3	36
Total Volume	342	795	947	1,008	832	696	387	158	99	98	109	185	5,658
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$756	$756	$756	$756	$756	$756	$756	$756	$756	$756	$756	$756	$9,072
Volumetric Distribution Charge	457	1,061	1,264	1,345	1,111	930	516	211	132	131	146	247	7,551
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	61	91	101	105	93	84	64	48	44	44	45	50	831
Total Base Non Gas Cost Rate Revenue	$1,273	$1,908	$2,121	$2,207	$1,960	$1,770	$1,336	$1,016	$932	$932	$947	$1,053	$17,455
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44541
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$152	$354	$422	$449	$371	$310	$172	$71	$44	$44	$49	$82	$2,520
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$152	$354	$422	$449	$371	$310	$172	$71	$44	$44	$49	$82	$2,520
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($3)	($5)	($6)	($6)	($5)	($5)	($4)	($3)	($2)	($2)	($3)	($4)	($48)
Total Revenues	$1,422	$2,257	$2,537	$2,650	$2,326	$2,075	$1,504	$1,084	$974	$974	$993	$1,131	$19,927
Unit Margin ($/Mcf)	$3.7220	$2.4000	$2.2395	$2.1889	$2.3553	$2.5412	$3.4535	$6.4110	$9.4425	$9.4660	$8.6661	$5.6898	$3.0851

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IVIS MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	268	271	271	271	274	274	274	274	267	268	268	269	3,249
Total Volume	195,005	235,685	270,037	308,686	283,815	257,929	187,364	164,387	149,320	147,127	149,938	157,821	2,507,113
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	67,536	68,292	68,292	68,292	69,048	69,048	69,048	69,048	67,284	67,536	67,536	67,788	818,748
Volumetric Distribution Charge	260,273	314,569	360,419	412,004	378,808	344,258	250,074	219,407	199,297	196,370	200,122	210,644	3,346,244
DSIC - Distribution System Improvement Charge	16,390	19,143	21,436	24,015	22,393	20,665	15,956	14,423	13,329	13,195	13,383	13,922	208,250
Total Base Non Gas Cost Rate Revenue	$344,199	$402,004	$450,146	$504,311	$470,249	$433,972	$335,078	$302,878	$279,910	$277,101	$281,041	$292,354	$4,373,242
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$95,552	$115,486	$132,318	$151,256	$139,069	$126,385	$91,808	$80,550	$73,167	$72,092	$73,469	$77,332	$1,228,484
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$95,552	$115,486	$132,318	$151,256	$139,069	$126,385	$91,808	$80,550	$73,167	$72,092	$73,469	$77,332	$1,228,484
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($922)	($1,077)	($1,206)	($1,351)	($1,260)	($1,162)	($898)	($811)	($750)	($742)	($753)	($1,023)	($11,955)
Total Revenues	$438,829	$516,413	$581,258	$654,216	$608,058	$559,195	$425,988	$382,617	$352,327	$348,451	$353,757	$368,663	$5,589,771
Unit Margin ($/Mcf)	$1.7651	$1.7057	$1.6670	$1.6337	$1.6569	$1.6825	$1.7884	$1.8425	$1.8746	$1.8834	$1.8744	$1.8524	$1.7443

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IVIS DMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	24	24	24	24	24	24	24	24	24	24	24	24	288
Total Volume	54,117	62,029	71,279	87,132	78,033	75,170	60,981	51,344	44,999	40,448	43,225	42,443	711,200
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	72,576
Volumetric Distribution Charge	72,229	82,790	95,136	116,295	104,151	100,330	81,391	68,528	60,060	53,986	57,692	56,649	949,239
DSIC - Distribution System Improvement Charge	3,914	4,442	5,059	6,117	5,510	5,319	4,372	3,729	3,305	3,002	3,187	3,135	51,091
Total Base Non Gas Cost Rate Revenue	$82,191	$93,280	$106,244	$128,461	$115,709	$111,696	$91,811	$78,305	$69,414	$63,036	$66,927	$65,832	$1,072,905
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($220)	($250)	($285)	($344)	($310)	($299)	($246)	($210)	($186)	($169)	($179)	($230)	($2,928)
Total Revenues	$81,971	$93,030	$105,959	$128,117	$115,399	$111,397	$91,565	$78,095	$69,228	$62,867	$66,748	$65,602	$1,069,977
Unit Margin ($/Mcf)	$1.5188	$1.5038	$1.4905	$1.4743	$1.4828	$1.4859	$1.5056	$1.5251	$1.5426	$1.5584	$1.5484	$1.5511	$1.5086

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LVIS MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	7	7	7	7	7	7	7	7	7	7	7	7	84
Total Volume	36,901	41,126	42,306	43,391	41,676	44,060	38,786	39,540	34,576	33,708	38,286	33,646	468,000
Base Non Gas Cost Rate:													
Basic Service Charge	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00
Volumetric Distribution Charge	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	7,161	7,161	7,161	7,161	7,161	7,161	7,161	7,161	7,161	7,161	7,161	7,161	85,932
Volumetric Distribution Charge	37,797	42,125	43,334	44,445	42,689	45,130	39,729	40,500	35,416	34,527	39,217	34,463	479,372
DSIC - Distribution System Improvement Charge	2,248	2,464	2,525	2,580	2,492	2,615	2,344	2,383	2,129	2,084	2,319	2,081	28,265
Total Base Non Gas Cost Rate Revenue	$47,206	$51,751	$53,019	$54,186	$52,342	$54,906	$49,234	$50,044	$44,706	$43,773	$48,696	$43,705	$593,570
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$18,081	$20,152	$20,730	$21,261	$20,421	$21,589	$19,005	$19,374	$16,942	$16,517	$18,760	$16,486	$229,318
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$18,081	$20,152	$20,730	$21,261	$20,421	$21,589	$19,005	$19,374	$16,942	$16,517	$18,760	$16,486	$229,318
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($126)	($139)	($142)	($145)	($140)	($147)	($132)	($134)	($120)	($117)	($130)	($153)	($1,625)
Total Revenues	$65,161	$71,764	$73,607	$75,302	$72,623	$76,348	$68,107	$69,284	$61,528	$60,173	$67,326	$60,038	$821,263
Unit Margin ($/Mcf)	$1.2793	$1.2583	$1.2532	$1.2488	$1.2559	$1.2462	$1.2694	$1.2657	$1.2930	$1.2986	$1.2719	$1.2990	$1.2683

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LVIS DMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	19	19	19	19	19	19	19	19	19	19	19	19	228
Total Volume	133,163	153,375	177,581	214,035	185,108	179,093	146,081	126,324	112,847	106,904	115,405	115,998	1,765,913
Base Non Gas Cost Rate:													
Basic Service Charge	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00
Volumetric Distribution Charge	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	19,437	19,437	19,437	19,437	19,437	19,437	19,437	19,437	19,437	19,437	19,437	19,437	233,244
Volumetric Distribution Charge	136,399	157,102	181,896	219,236	189,606	183,445	149,631	129,393	115,589	109,501	118,209	118,817	1,808,824
DSIC - Distribution System Improvement Charge	7,792	8,827	10,067	11,934	10,452	10,144	8,453	7,442	6,751	6,447	6,882	6,913	102,103
Total Base Non Gas Cost Rate Revenue	$163,627	$185,366	$211,399	$250,607	$219,495	$213,026	$177,522	$156,272	$141,778	$135,385	$144,528	$145,166	$2,144,172
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($438)	($497)	($566)	($671)	($588)	($571)	($475)	($419)	($380)	($363)	($387)	($508)	($5,863)
Total Revenues	$163,189	$184,869	$210,833	$249,936	$218,907	$212,455	$177,047	$155,853	$141,398	$135,022	$144,141	$144,658	$2,138,309
Unit Margin ($/Mcf)	$1.2288	$1.2086	$1.1904	$1.1709	$1.1858	$1.1895	$1.2152	$1.2371	$1.2564	$1.2664	$1.2524	$1.2515	$1.2142

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LIS MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	1	1	1	1	1	1	1	1	1	1	1	1	12
Total Volume	30,733	29,878	29,763	34,035	29,755	33,124	26,802	28,844	29,838	29,210	29,192	27,095	358,268
Base Non Gas Cost Rate:													
Basic Service Charge	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00
Volumetric Distribution Charge	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	13,980
Volumetric Distribution Charge	18,418	17,906	17,837	20,397	17,832	19,851	16,063	17,286	17,882	17,506	17,495	16,238	214,710
DSIC - Distribution System Improvement Charge	979	954	950	1,078	950	1,051	861	923	952	934	933	870	11,435
Total Base Non Gas Cost Rate Revenue	$20,562	$20,025	$19,952	$22,640	$19,947	$22,067	$18,089	$19,374	$19,999	$19,604	$19,593	$18,273	$240,125
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$15,059	$14,640	$14,584	$16,677	$14,580	$16,231	$13,133	$14,134	$14,621	$14,313	$14,304	$13,277	$175,553
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$15,059	$14,640	$14,584	$16,677	$14,580	$16,231	$13,133	$14,134	$14,621	$14,313	$14,304	$13,277	$175,553
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($55)	($54)	($53)	($61)	($53)	($59)	($48)	($52)	($54)	($53)	($52)	($64)	($658)
Total Revenues	$35,566	$34,611	$34,483	$39,256	$34,474	$38,239	$31,174	$33,456	$34,566	$33,864	$33,845	$31,486	$415,020
Unit Margin ($/Mcf)	$0.6691	$0.6702	$0.6704	$0.6652	$0.6704	$0.6662	$0.6749	$0.6717	$0.6703	$0.6711	$0.6712	$0.6744	$0.6702

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Current Rates)

LIS DMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	9	9	9	9	9	9	9	9	9	9	9	9	108
Total Volume	246,967	288,594	354,916	402,090	367,786	357,486	268,110	212,395	210,027	213,653	218,273	204,686	3,344,983
Base Non Gas Cost Rate:													
Basic Service Charge	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00
Volumetric Distribution Charge	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	10,485	10,485	10,485	10,485	10,485	10,485	10,485	10,485	10,485	10,485	10,485	10,485	125,820
Volumetric Distribution Charge	148,007	172,954	212,701	240,973	220,414	214,242	160,678	127,289	125,869	128,042	130,811	122,668	2,004,648
DSIC - Distribution System Improvement Charge	7,925	9,172	11,159	12,573	11,545	11,236	8,558	6,889	6,818	6,926	7,065	6,658	106,523
Total Base Non Gas Cost Rate Revenue	$166,417	$192,611	$234,346	$264,031	$242,444	$235,963	$179,721	$144,662	$143,172	$145,453	$148,361	$139,811	$2,236,992
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($446)	($516)	($628)	($707)	($649)	($632)	($481)	($387)	($383)	($390)	($397)	($489)	($6,105)
Total Revenues	$165,971	$192,095	$233,718	$263,324	$241,795	$235,331	$179,240	$144,275	$142,789	$145,063	$147,964	$139,322	$2,230,887
Unit Margin ($/Mcf)	$0.6738	$0.6674	$0.6603	$0.6566	$0.6592	$0.6601	$0.6703	$0.6811	$0.6817	$0.6808	$0.6797	$0.6831	$0.6688

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Current Rates)

LIS DMT Negotiated	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	10	10	10	10	10	10	10	10	10	10	10	10	120
Total Volume	677,100	736,854	846,481	888,373	855,577	843,770	746,391	702,742	687,908	650,639	696,708	705,134	9,037,676
Base Non Gas Cost Rate:													
Basic Service Charge	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00
Volumetric Distribution Charge	$0.29480	$0.28940	$0.28280	$0.28540	$0.28450	$0.28580	$0.29060	$0.29030	$0.32220	$0.32290	$0.32300	$0.29050	$0.29575
DSIC - Distribution System Improvement Charge	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	5.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	139,800
Volumetric Distribution Charge	199,609	213,245	239,385	253,542	243,412	241,149	216,901	204,006	221,644	210,091	225,037	204,841	2,672,862
DSIC - Distribution System Improvement Charge	10,563	11,245	12,552	13,260	12,753	12,640	11,428	10,783	11,665	11,087	11,834	10,825	140,633
Total Base Non Gas Cost Rate Revenue	$221,822	$236,140	$263,587	$278,451	$267,815	$265,439	$239,979	$226,439	$244,959	$232,828	$248,521	$227,316	$2,953,296
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment %	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.27%	-0.35%	-0.27%
Rider B - State Tax Adjustment	($594)	($633)	($706)	($746)	($717)	($711)	($643)	($607)	($656)	($624)	($666)	($796)	($8,099)
Total Revenues	$221,228	$235,507	$262,881	$277,705	$267,098	$264,728	$239,336	$225,832	$244,303	$232,204	$247,855	$226,520	$2,945,197
Unit Margin ($/Mcf)	$0.3276	$0.3205	$0.3114	$0.3134	$0.3130	$0.3146	$0.3215	$0.3222	$0.3561	$0.3578	$0.3567	$0.3224	$0.3268

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Forfeited Discounts (Current Rates)

	Revenues							Forfeited
	Residential	Commercial	Public Authority	Industrial	Transportation	Total	Factor	Discounts
11/30/2026	14,345,578	2,092,066	161,905	123,327	3,209,654	19,932,530	0.44545%	88,790
12/31/2026	24,142,227	3,594,379	198,552	233,021	4,424,137	32,592,316	0.27170%	88,554
1/31/2027	30,030,916	4,549,887	245,916	307,711	5,362,441	40,496,871	0.33147%	134,233
2/28/2027	29,898,393	4,585,472	215,926	342,657	5,723,422	40,765,870	0.35173%	143,384
3/31/2027	26,363,073	4,019,361	200,631	287,430	5,164,231	36,034,726	0.35526%	128,016
4/30/2027	20,616,738	3,145,750	171,225	217,600	4,527,991	28,679,304	0.35146%	100,795
5/31/2027	13,867,486	2,067,849	134,153	140,741	3,381,098	19,591,328	0.50074%	98,101
6/30/2027	7,300,339	1,075,022	102,952	79,555	2,475,003	11,032,871	0.70686%	77,988
7/31/2027	4,994,618	738,791	101,004	69,230	2,102,096	8,005,739	0.73932%	59,188
8/31/2027	4,716,511	690,311	89,189	51,153	2,044,913	7,592,077	0.89896%	68,250
9/30/2027	5,108,880	638,605	229,647	55,083	2,132,879	8,165,094	0.84404%	68,917
10/31/2027	7,748,552	1,083,903	138,839	75,862	2,314,572	11,361,727	0.60935%	69,232
Total	$ 189,133,311	$ 28,281,397	$ 1,989,940	$ 1,983,369	$ 42,862,436	$ 264,250,453	0.42590%	$1,125,448

NATIONAL FUEL EXHIBIT CTM-2

FULLY PROJECTED FUTURE TEST YEAR

PROPOSED RATES

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Summary of Revenues (Proposed Rates)

	Account	Reference	Total Revenue	Total Gas Cost	Total Delivery
Gas Sales					
Residential	480	CTM-2, Sch. 2	203,176,401	100,054,941	103,121,460
Commercial	481	""	29,604,694	16,764,586	12,840,108
Industrial	481	""	2,029,552	1,285,900	743,652
Public Authority	481	""	2,092,849	1,245,973	846,876
Subtotal			236,903,496	119,351,400	117,552,096
Transportation					
Residential	489	CTM-2, Sch. 2	10,414,303	765,184	9,649,119
Commercial	489	""	13,889,589	1,808,495	12,081,094
Industrial	489	""	16,422,736	1,657,414	14,765,322
Public Authority	489	""	6,217,015	988,089	5,228,926
Subtotal			46,943,643	5,219,182	41,724,461
Total Billed Revenue			283,847,139	124,570,582	159,276,556
Other Operating Revenues					
Forfeited Discounts	487	CTM-2, Sch. 5	1,209,265	0	1,209,265
Rent From Gas Property	493		100,267	0	100,267
Other Gas Revenues	495		47,653	0	47,653
Subtotal			1,357,185	0	1,357,185
Total Operating Revenue			285,204,324	124,570,582	160,633,741

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Summary of Revenues by Service Class (Proposed Rates)

	Account	Reference (CTM-2, Sch. 4)	Average Customers	Total Usage (Mcf)	Total Revenue	Total Gas Cost	Total Delivery
Residential Sales	480	Page 1	174,314	16,570,240	195,383,405	96,183,614	99,199,791
Residential CAP	480	Page 2	6,478	681,296	7,792,996	3,871,327	3,921,669
Residential SATC	489	Page 3	16,558	1,591,601	9,860,420	708,740	9,151,680
Residential MMT	489	Page 4	475	115,189	553,883	56,444	497,439
Total Residential			197,825	18,958,326	213,590,704	100,820,125	112,770,578
Small Commercial < 250 Sales	481	Page 5	8,181	903,474	10,843,721	5,133,809	5,709,912
Small Commercial < 250 SATC	489	Page 6	589	69,868	447,338	31,113	416,225
Small Commercial < 250 MMT	489	Page 7	1,107	151,202	914,620	74,089	840,531
Small Commercial > 250 Sales	481	Page 8	2,709	1,255,860	11,810,703	7,136,173	4,674,530
Small Commercial > 250 SATC	489	Page 9	234	110,600	442,995	49,252	393,743
Small Commercial > 250 MMT	489	Page 10	1,163	664,215	2,545,175	325,465	2,219,710
Large Commercial	481	Page 11	431	720,949	6,400,309	4,096,650	2,303,659
Large Commercial SATC	489	Page 12	47	73,045	261,448	32,527	228,921
Large Commercial MMT	489	Page 13	728	2,644,998	7,841,677	1,296,049	6,545,628
Large Commercial DMT	489	Page 14	11	716,683	1,436,336	0	1,436,336
Natural Gas Vechicles	481	Page 15	7	70,034	549,962	397,954	152,008
Total Commercial			15,204	7,380,929	43,494,283	18,573,081	24,921,202
Small Public Authority < 250 Sales	481	Page 16	364	132,454	1,289,032	752,646	536,386
Small Public Authority < 250 SATC	489	Page 17	23	2,523	16,779	1,123	15,656
Small Public Authority < 250 MMT	489	Page 18	228	34,706	200,464	17,005	183,459
Small Public Authority > 250 Sales	481	Page 19	99	37,700	365,059	214,220	150,839
Small Public Authority > 250 SATC	489	Page 20	19	10,118	39,090	4,504	34,586
Small Public Authority > 250 MMT	489	Page 21	230	123,113	480,343	60,327	420,016
Large Public Authority	481	Page 22	31	49,118	438,759	279,107	159,652
Large Public Authority SATC	489	Page 23	3	3,788	14,608	1,685	12,923
Large Public Authority MMT	489	Page 24	282	1,843,767	5,058,780	903,445	4,155,335
Large Public Authority DMT	489	Page 25	3	203,162	406,951	0	406,951
Total Public Authority			1,282	2,440,449	8,309,864	2,234,062	6,075,802
SVIS Sales	481	Page 26	127	60,192	636,031	342,031	294,000
SVIS SATC	489	Page 27	11	4,900	26,092	2,182	23,910
SVIS MMT	489	Page 28	64	39,506	187,989	19,357	168,632
IVIS Sales	481	Page 29	54	166,107	1,393,520	943,869	449,651
IVIS SATC	489	Page 30	3	5,658	20,530	2,520	18,010
IVIS MMT	489	Page 31	271	2,507,113	6,007,898	1,228,484	4,779,414
IVIS DMT	489	Page 32	24	711,200	1,196,109	0	1,196,109
LVIS MMT	489	Page 33	7	468,000	882,579	229,318	653,261
LVIS DMT	489	Page 34	19	1,765,913	2,340,420	0	2,340,420
LIS MMT	489	Page 35	1	358,268	438,269	175,553	262,716
LIS DMT	489	Page 36	9	3,344,983	2,445,989	0	2,445,989
LIS DMT Negotiated	489	Page 37	10	9,037,676	2,876,862	0	2,876,862
Total Industrial			600	18,469,516	18,452,288	2,943,314	15,508,974
Grand Total			**214,911**	**47,249,221**	**283,847,139**	**124,570,582**	**159,276,556**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Billed Delivery Revenues by Rate Type (Proposed Rates)

	Account	Reference (CTM-2, Sch. 4)	Basic Service Charge	Distribution Charge	Rider B	DSIC	Rider E	Rider G	Rider H	Total Delivery
Residential Sales	480	Page 1	39,743,525	55,974,984	0	0	0	1,577,362	1,903,921	99,199,791
Residential CAP	480	Page 2	1,477,088	2,301,446	0	0	0	64,854	78,281	3,921,669
Residential SATC	489	Page 3	3,775,182	5,376,498	0	0	0	0	0	9,151,680
Residential MMT	489	Page 4	108,324	389,115	0	0	0	0	0	497,439
Total Residential			45,104,119	64,042,042	0	0	0	1,642,216	1,982,201	112,770,578
Small Commercial < 250 Sales	481	Page 5	2,945,040	2,641,490	0	0	0	19,572	103,809	5,709,912
Small Commercial < 250 SATC	489	Page 6	211,950	204,275	0	0	0	0	0	416,225
Small Commercial < 250 MMT	489	Page 7	398,460	442,071	0	0	0	0	0	840,531
Small Commercial > 250 Sales	481	Page 8	1,625,200	2,877,826	0	0	0	27,206	144,298	4,674,530
Small Commercial > 250 SATC	489	Page 9	140,300	253,443	0	0	0	0	0	393,743
Small Commercial > 250 MMT	489	Page 10	697,650	1,522,060	0	0	0	0	0	2,219,710
Large Commercial	481	Page 11	780,368	1,424,835	0	0	0	15,618	82,837	2,303,659
Large Commercial SATC	489	Page 12	84,560	144,361	0	0	0	0	0	228,921
Large Commercial MMT	489	Page 13	1,318,230	5,227,398	0	0	0	0	0	6,545,628
Large Commercial DMT	489	Page 14	19,932	1,416,404	0	0	0	0	0	1,436,336
Natural Gas Vechicles	481	Page 15	0	152,008	0	0	0	0	0	152,008
Total Commercial			8,221,690	16,306,170	0	0	0	62,397	330,945	24,921,202
Small Public Authority < 250 Sales	481	Page 16	131,040	387,257	0	0	0	2,869	15,219	536,386
Small Public Authority < 250 SATC	489	Page 17	8,280	7,376	0	0	0	0	0	15,656
Small Public Authority < 250 MMT	489	Page 18	81,990	101,469	0	0	0	0	0	183,459
Small Public Authority > 250 Sales	481	Page 19	59,300	86,390	0	0	0	817	4,332	150,839
Small Public Authority > 250 SATC	489	Page 20	11,400	23,186	0	0	0	0	0	34,586
Small Public Authority > 250 MMT	489	Page 21	137,900	282,116	0	0	0	0	0	420,016
Large Public Authority	481	Page 22	55,870	97,074	0	0	0	1,064	5,644	159,652
Large Public Authority SATC	489	Page 23	5,436	7,487	0	0	0	0	0	12,923
Large Public Authority MMT	489	Page 24	511,437	3,643,898	0	0	0	0	0	4,155,335
Large Public Authority DMT	489	Page 25	5,436	401,515	0	0	0	0	0	406,951
Total Public Authority			1,008,089	5,037,769	0	0	0	4,750	25,194	6,075,802
SVIS Sales	481	Page 26	125,050	160,730	0	0	0	1,304	6,916	294,000
SVIS SATC	489	Page 27	10,824	13,086	0	0	0	0	0	23,910
SVIS MMT	489	Page 28	63,140	105,492	0	0	0	0	0	168,632
IVIS Sales	481	Page 29	164,556	262,411	0	0	0	3,598	19,086	449,651
IVIS SATC	489	Page 30	9,072	8,938	0	0	0	0	0	18,010
IVIS MMT	489	Page 31	818,748	3,960,666	0	0	0	0	0	4,779,414
IVIS DMT	489	Page 32	72,576	1,123,533	0	0	0	0	0	1,196,109
LVIS MMT	489	Page 33	117,600	535,661	0	0	0	0	0	653,261
LVIS DMT	489	Page 34	319,200	2,021,220	0	0	0	0	0	2,340,420
LIS MMT	489	Page 35	20,400	242,316	0	0	0	0	0	262,716
LIS DMT	489	Page 36	183,600	2,262,389	0	0	0	0	0	2,445,989
LIS DMT Negotiated	489	Page 37	204,000	2,672,862	0	0	0	0	0	2,876,862
Total Industrial			2,108,766	13,369,304	0	0	0	4,902	26,002	15,508,974
Grand Total			**56,442,664**	**98,755,285**	**0**	**0**	**0**	**1,714,265**	**2,364,342**	**159,276,556**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Proposed Rates)

Residential Sales Service	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	172,279	173,990	174,858	175,562	176,296	176,225	175,236	174,483	174,312	173,568	173,213	171,743	2,091,764
Total Volume	1,227,199	2,254,822	2,876,116	2,867,698	2,503,507	1,899,677	1,180,335	490,669	250,110	221,828	263,885	534,395	16,570,240
Base Non Gas Cost Rate:													
Basic Service Charge	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00
Volumetric Distribution Charge	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$3,273,303	$3,305,802	$3,322,299	$3,335,673	$3,349,633	$3,348,269	$3,329,484	$3,315,182	$3,311,928	$3,297,798	$3,291,045	$3,263,111	$39,743,525
Volumetric Distribution Charge	4,145,530	7,616,885	9,715,645	9,687,207	8,456,954	6,417,190	3,987,223	1,657,500	844,882	749,343	891,415	1,805,211	55,974,984
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	116,820	214,642	273,785	272,983	238,315	180,835	112,359	46,708	23,809	21,116	25,120	50,870	1,577,362
Rider H - Gas Procurement Charge	141,005	259,079	330,466	329,498	287,653	218,273	135,621	56,378	28,738	25,488	30,320	61,402	1,903,921
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$7,676,658	$11,396,408	$13,642,194	$13,625,361	$12,332,555	$10,164,567	$7,564,686	$5,075,767	$4,209,356	$4,093,745	$4,237,899	$5,180,594	$99,199,791
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360
Rider F - CAP Discount Charge	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$546,472	$1,004,072	$1,280,735	$1,276,986	$1,114,812	$845,926	$525,603	$218,495	$111,374	$98,780	$117,508	$237,966	$7,378,729
Natural Gas Supply Charge ($/Mcf) - Rider A	6,176,981	11,349,420	14,476,645	14,434,271	12,601,151	9,561,832	5,941,099	2,469,731	1,258,904	1,116,547	1,328,238	2,689,826	83,404,645
Gas Adjustment Charge ($/Mcf) - Rider A	249,858	459,082	585,577	583,863	509,714	386,774	240,316	99,900	50,922	45,164	53,727	108,803	3,373,700
Rider F - CAP Discount Charge	150,086	275,765	351,749	350,719	306,179	232,330	144,355	60,009	30,588	27,130	32,273	65,357	2,026,540
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$7,123,397	$13,088,339	$16,694,706	$16,645,839	$14,531,856	$11,026,862	$6,851,373	$2,848,135	$1,451,788	$1,287,621	$1,531,746	$3,101,952	$96,183,614
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$14,800,055	$24,484,747	$30,336,900	$30,271,201	$26,864,411	$21,191,429	$14,416,059	$7,923,902	$5,661,145	$5,381,366	$5,769,645	$8,282,546	$195,383,405
Unit Margin ($/Mcf)	$6.2554	$5.0542	$4.7433	$4.7513	$4.9261	$5.3507	$6.4089	$10.3446	$16.8300	$18.4546	$16.0597	$9.6943	$5.9866

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Residential CAP	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	7,513	7,115	6,964	6,602	6,027	5,875	6,289	6,210	5,665	5,689	5,725	8,067	77,741
Total Volume	56,871	101,383	124,609	117,863	94,031	68,113	48,442	19,338	8,208	7,153	8,629	26,656	681,296
Base Non Gas Cost Rate:													
Basic Service Charge	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00
Volumetric Distribution Charge	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$142,744	$135,185	$132,317	$125,444	$114,512	$111,629	$119,486	$117,995	$107,626	$108,093	$108,774	$153,282	$1,477,088
Volumetric Distribution Charge	192,113	342,477	420,934	398,148	317,642	230,089	163,638	65,324	27,725	24,162	29,150	90,044	2,301,446
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	5,414	9,651	11,862	11,220	8,951	6,484	4,611	1,841	781	681	821	2,537	64,854
Rider H - Gas Procurement Charge	6,534	11,649	14,318	13,543	10,804	7,826	5,566	2,222	943	822	992	3,063	78,281
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$346,805	$498,962	$579,430	$548,354	$451,910	$356,028	$293,302	$187,382	$137,076	$133,757	$139,738	$248,926	$3,921,669
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$25,325	$45,146	$55,488	$52,485	$41,872	$30,331	$21,571	$8,611	$3,655	$3,185	$3,843	$11,870	$303,382
Natural Gas Supply Charge ($/Mcf) - Rider A	286,254	510,302	627,205	593,254	473,298	342,841	243,827	97,335	41,312	36,001	43,435	134,169	3,429,233
Gas Adjustment Charge ($/Mcf) - Rider A	11,579	20,642	25,370	23,997	19,145	13,868	9,863	3,937	1,671	1,456	1,757	5,427	138,712
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$323,158	$576,090	$708,063	$669,736	$534,315	$387,040	$275,261	$109,883	$46,638	$40,642	$49,035	$151,466	$3,871,327
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$669,963	$1,075,052	$1,287,493	$1,218,090	$986,225	$743,068	$568,563	$297,265	$183,714	$174,399	$188,773	$400,392	$7,792,996
Unit Margin ($/Mcf)	$6.0981	$4.9215	$4.6500	$4.6524	$4.8059	$5.2270	$6.0547	$9.6899	$16.7012	$18.7007	$16.1933	$9.3386	$5.7562

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Residential SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	16,280	16,241	16,289	16,285	16,354	16,403	16,599	16,767	16,864	17,050	17,136	16,427	198,694
Total Volume	118,701	216,665	275,420	272,691	237,611	181,451	115,077	47,731	24,800	22,117	26,013	53,326	1,591,601
Base Non Gas Cost Rate:													
Basic Service Charge	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00
Volumetric Distribution Charge	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$309,323	$308,573	$309,491	$309,407	$310,724	$311,656	$315,385	$318,567	$320,414	$323,954	$325,578	$312,110	$3,775,182
Volumetric Distribution Charge	400,976	731,903	930,381	921,162	802,660	612,950	388,734	161,237	83,775	74,712	87,872	180,138	5,376,498
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$710,299	$1,040,476	$1,239,872	$1,230,569	$1,113,384	$924,606	$704,119	$479,803	$404,189	$398,666	$413,450	$492,249	$9,151,680
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$52,857	$96,481	$122,645	$121,429	$105,808	$80,800	$51,244	$21,255	$11,043	$9,849	$11,583	$23,746	$708,740
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$52,857	$96,481	$122,645	$121,429	$105,808	$80,800	$51,244	$21,255	$11,043	$9,849	$11,583	$23,746	$708,740
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$763,156	$1,136,957	$1,362,517	$1,351,998	$1,219,192	$1,005,406	$755,363	$501,058	$415,232	$408,515	$425,033	$515,995	$9,860,420
Unit Margin ($/Mcf)	$5.9840	$4.8022	$4.5017	$4.5127	$4.6857	$5.0956	$6.1187	$10.0523	$16.2979	$18.0254	$15.8942	$9.2309	$5.7500

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Residential MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	460	463	463	464	466	468	467	468	509	508	506	459	5,701
Total Volume	7,987	14,928	20,246	21,184	18,655	14,194	8,410	3,173	1,249	1,005	1,345	2,814	115,189
Base Non Gas Cost Rate:													
Basic Service Charge	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00
Volumetric Distribution Charge	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804	$3.37804
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	8,738	8,792	8,799	8,823	8,848	8,895	8,874	8,888	9,664	9,660	9,623	8,721	108,324
Volumetric Distribution Charge	26,980	50,428	68,390	71,559	63,017	47,948	28,409	10,720	4,218	3,396	4,544	9,507	389,115
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$35,718	$59,220	$77,190	$80,383	$71,865	$56,843	$37,283	$19,607	$13,882	$13,055	$14,167	$18,228	$497,439
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49001
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$3,914	$7,315	$9,920	$10,380	$9,141	$6,955	$4,121	$1,555	$612	$493	$659	$1,379	$56,444
OPEB Surcredit - Rider I	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Gas Cost Revenues	$3,914	$7,315	$9,920	$10,380	$9,141	$6,955	$4,121	$1,555	$612	$493	$659	$1,379	$56,444
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$39,632	$66,535	$87,110	$90,763	$81,006	$63,798	$41,404	$21,162	$14,494	$13,548	$14,826	$19,607	$553,883
Unit Margin ($/Mcf)	$4.4721	$3.9670	$3.8127	$3.7946	$3.8523	$4.0047	$4.4333	$6.1788	$11.1176	$12.9878	$10.5312	$6.4770	$4.3184

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Small Commercial < 250 Sales	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	8,081	8,224	8,307	8,335	8,309	8,293	8,250	8,175	8,087	8,041	8,029	8,037	98,168
Total Volume	65,148	131,357	171,832	171,148	146,590	107,838	62,353	18,218	2,915	1,175	3,791	21,108	903,474
Base Non Gas Cost Rate:													
Basic Service Charge	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00
Volumetric Distribution Charge	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$242,430	$246,720	$249,210	$250,050	$249,270	$248,790	$247,500	$245,250	$242,610	$241,230	$240,870	$241,110	$2,945,040
Volumetric Distribution Charge	190,473	384,050	502,387	500,386	428,586	315,287	182,303	53,264	8,522	3,435	11,083	61,715	2,641,490
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	1,411	2,846	3,722	3,708	3,176	2,336	1,351	395	63	25	82	457	19,572
Rider H - Gas Procurement Charge	7,485	15,093	19,744	19,665	16,843	12,391	7,164	2,093	335	135	436	2,425	103,809
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$441,800	$648,709	$775,063	$773,808	$697,875	$578,804	$438,318	$301,002	$251,530	$244,825	$252,471	$305,708	$5,709,912
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$29,010	$58,493	$76,517	$76,212	$65,277	$48,020	$27,766	$8,112	$1,298	$523	$1,688	$9,400	$402,316
Natural Gas Supply Charge ($/Mcf) - Rider A	327,915	661,174	864,900	861,456	737,846	542,794	313,849	91,698	14,672	5,914	19,081	106,247	$4,547,546
Gas Adjustment Charge ($/Mcf) - Rider A	13,264	26,744	34,985	34,846	29,846	21,956	12,695	3,709	593	239	772	4,298	$183,947
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$370,189	$746,411	$976,402	$972,514	$832,969	$612,770	$354,310	$103,519	$16,563	$6,676	$21,541	$119,945	$5,133,809
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$811,989	$1,395,120	$1,751,465	$1,746,322	$1,530,844	$1,191,574	$792,628	$404,521	$268,093	$251,501	$274,012	$425,653	$10,843,721
Unit Margin ($/Mcf)	$6.7815	$4.9385	$4.5106	$4.5213	$4.7607	$5.3673	$7.0296	$16.5223	$86.2927	$208.3819	$66.6002	$14.4827	$6.3200

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Proposed Rates)

Small Commercial < 250 SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	625	618	614	605	582	583	581	578	578	571	569	561	7,065
Total Volume	5,379	10,457	13,430	13,137	10,868	8,046	4,692	1,429	293	161	354	1,622	69,868
Base Non Gas Cost Rate:													
Basic Service Charge	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00
Volumetric Distribution Charge	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$18,750	$18,540	$18,420	$18,150	$17,460	$17,490	$17,430	$17,340	$17,340	$17,130	$17,070	$16,830	$211,950
Volumetric Distribution Charge	15,726	30,573	39,265	38,408	31,774	23,523	13,719	4,179	858	471	1,036	4,741	204,275
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$34,476	$49,113	$57,685	$56,558	$49,234	$41,013	$31,149	$21,519	$18,198	$17,601	$18,106	$21,571	$416,225
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44531
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$2,395	$4,656	$5,980	$5,850	$4,839	$3,583	$2,090	$637	$131	$72	$158	$722	$31,113
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$2,395	$4,656	$5,980	$5,850	$4,839	$3,583	$2,090	$637	$131	$72	$158	$722	$31,113
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$36,871	$53,769	$63,665	$62,408	$54,073	$44,596	$33,239	$22,156	$18,329	$17,673	$18,264	$22,293	$447,338
Unit Margin ($/Mcf)	$6.4096	$4.6967	$4.2953	$4.3053	$4.5303	$5.0976	$6.6382	$15.0538	$62.0330	$109.1493	$51.0904	$13.3026	$5.9573

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Proposed Rates)

Small Commercial < 250 MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	1,089	1,096	1,106	1,109	1,092	1,098	1,103	1,109	1,110	1,120	1,122	1,128	13,282
Total Volume	9,121	19,400	29,489	31,401	24,933	16,910	7,855	3,138	1,971	1,502	1,995	3,489	151,202
Base Non Gas Cost Rate:													
Basic Service Charge	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00
Volumetric Distribution Charge	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	32,670	32,880	33,180	33,270	32,760	32,940	33,090	33,270	33,300	33,600	33,660	33,840	398,460
Volumetric Distribution Charge	26,666	56,719	86,216	91,808	72,896	49,439	22,965	9,173	5,762	4,393	5,831	10,202	442,071
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$59,336	$89,599	$119,396	$125,078	$105,656	$82,379	$56,055	$42,443	$39,062	$37,993	$39,491	$44,042	$840,531
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$4,469	$9,506	$14,449	$15,387	$12,217	$8,286	$3,849	$1,537	$966	$736	$977	$1,710	$74,089
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$4,469	$9,506	$14,449	$15,387	$12,217	$8,286	$3,849	$1,537	$966	$736	$977	$1,710	$74,089
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$63,805	$99,105	$133,845	$140,465	$117,873	$90,665	$59,904	$43,980	$40,028	$38,729	$40,468	$45,752	$914,620
Unit Margin ($/Mcf)	$6.5057	$4.6186	$4.0489	$3.9832	$4.2376	$4.8717	$7.1364	$13.5275	$19.8204	$25.2867	$19.7998	$12.6215	$5.5590

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Proposed Rates)

Small Commercial > 250 Sales	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	2,671	2,690	2,702	2,712	2,725	2,736	2,738	2,721	2,711	2,700	2,697	2,701	32,504
Total Volume	92,983	170,680	217,485	216,896	189,376	144,230	90,416	37,383	18,902	16,708	19,846	40,955	1,255,860
Base Non Gas Cost Rate:													
Basic Service Charge	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00
Volumetric Distribution Charge	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$133,550	$134,500	$135,100	$135,600	$136,250	$136,800	$136,900	$136,050	$135,550	$135,000	$134,850	$135,050	$1,625,200
Volumetric Distribution Charge	213,072	391,117	498,370	497,022	433,958	330,506	207,190	85,663	43,313	38,288	45,477	93,849	2,877,826
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	2,014	3,698	4,711	4,699	4,103	3,125	1,959	810	409	362	430	887	27,206
Rider H - Gas Procurement Charge	10,684	19,611	24,989	24,921	21,759	16,572	10,389	4,295	2,172	1,920	2,280	4,706	144,298
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$359,320	$548,926	$663,171	$662,242	$596,070	$487,002	$356,438	$226,818	$181,445	$175,570	$183,037	$234,492	$4,674,530
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$41,405	$76,004	$96,846	$96,584	$84,329	$64,226	$40,262	$16,646	$8,417	$7,440	$8,837	$18,237	$559,233
Natural Gas Supply Charge ($/Mcf) - Rider A	468,020	859,103	1,094,688	1,091,727	953,205	725,968	455,101	188,162	95,139	84,100	99,891	206,143	6,321,247
Gas Adjustment Charge ($/Mcf) - Rider A	18,931	34,751	44,280	44,160	38,557	29,365	18,409	7,611	3,848	3,402	4,041	8,338	255,693
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$528,356	$969,858	$1,235,814	$1,232,471	$1,076,091	$819,559	$513,772	$212,419	$107,404	$94,942	$112,769	$232,718	$7,136,173
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$887,676	$1,518,784	$1,898,985	$1,894,713	$1,672,161	$1,306,561	$870,210	$439,237	$288,849	$270,512	$295,806	$467,210	$11,810,703
Unit Margin ($/Mcf)	$3.8644	$3.2161	$3.0493	$3.0533	$3.1475	$3.3766	$3.9422	$6.0675	$9.5994	$10.5078	$9.2230	$5.7256	$3.7222

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Proposed Rates)

Small Commercial > 250 SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	254	251	241	237	237	233	227	224	225	227	227	223	2,806
Total Volume	8,914	15,660	18,956	18,517	16,151	12,150	7,571	3,350	1,913	1,762	2,016	3,641	110,600
Base Non Gas Cost Rate:													
Basic Service Charge	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00
Volumetric Distribution Charge	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$12,700	$12,550	$12,050	$11,850	$11,850	$11,650	$11,350	$11,200	$11,250	$11,350	$11,350	$11,150	$140,300
Volumetric Distribution Charge	20,426	35,886	43,437	42,432	37,010	27,843	17,350	7,677	4,383	4,038	4,619	8,342	253,443
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$33,126	$48,436	$55,487	$54,282	$48,860	$39,493	$28,700	$18,877	$15,633	$15,388	$15,969	$19,492	$393,743
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44532
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$3,969	$6,974	$8,441	$8,246	$7,192	$5,411	$3,371	$1,492	$852	$785	$898	$1,621	$49,252
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$3,969	$6,974	$8,441	$8,246	$7,192	$5,411	$3,371	$1,492	$852	$785	$898	$1,621	$49,252
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$37,095	$55,410	$63,928	$62,528	$56,052	$44,904	$32,071	$20,369	$16,485	$16,173	$16,867	$21,113	$442,995
Unit Margin ($/Mcf)	$3.7163	$3.0929	$2.9272	$2.9315	$3.0252	$3.2503	$3.7906	$5.6348	$8.1730	$8.7331	$7.9222	$5.3542	$3.5600

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Proposed Rates)

Small Commercial > 250 MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	1,142	1,146	1,148	1,145	1,160	1,169	1,171	1,168	1,173	1,177	1,178	1,176	13,953
Total Volume	49,398	89,971	114,236	113,164	99,692	76,312	48,021	20,148	10,458	9,370	11,078	22,367	664,215
Base Non Gas Cost Rate:													
Basic Service Charge	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00
Volumetric Distribution Charge	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	57,100	57,300	57,400	57,250	58,000	58,450	58,550	58,400	58,650	58,850	58,900	58,800	697,650
Volumetric Distribution Charge	113,195	206,171	261,773	259,318	228,446	174,869	110,041	46,170	23,964	21,472	25,386	51,254	1,522,060
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$170,295	$263,471	$319,173	$316,568	$286,446	$233,319	$168,591	$104,570	$82,614	$80,322	$84,286	$110,054	$2,219,710
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$24,205	$44,086	$55,976	$55,450	$48,849	$37,393	$23,530	$9,873	$5,124	$4,591	$5,428	$10,960	$325,465
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$24,205	$44,086	$55,976	$55,450	$48,849	$37,393	$23,530	$9,873	$5,124	$4,591	$5,428	$10,960	$325,465
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$194,500	$307,557	$375,149	$372,018	$335,295	$270,712	$192,121	$114,443	$87,738	$84,913	$89,714	$121,014	$2,545,175
Unit Margin ($/Mcf)	$3.4474	$2.9284	$2.7940	$2.7974	$2.8733	$3.0575	$3.5108	$5.1900	$7.8997	$8.5722	$7.6082	$4.9204	$3.3419

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Large Commercial	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	429	433	439	442	440	432	431	422	423	423	427	427	5,168
Total Volume	49,963	88,907	118,285	124,667	107,462	83,890	51,231	27,893	20,952	19,208	6,040	22,451	720,949
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$64,779	$65,383	$66,289	$66,742	$66,440	$65,232	$65,081	$63,722	$63,873	$63,873	$64,477	$64,477	$780,368
Volumetric Distribution Charge	98,743	175,709	233,771	246,383	212,380	165,795	101,249	55,126	41,408	37,962	11,937	44,371	1,424,835
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	1,082	1,926	2,562	2,701	2,328	1,817	1,110	604	454	416	131	486	15,618
Rider H - Gas Procurement Charge	5,741	10,215	13,591	14,324	12,347	9,639	5,886	3,205	2,407	2,207	694	2,580	82,837
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$170,345	$253,233	$316,214	$330,149	$293,495	$242,484	$173,326	$122,658	$108,143	$104,458	$77,239	$111,914	$2,303,659
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$22,248	$39,590	$52,673	$55,514	$47,853	$37,356	$22,813	$12,421	$9,330	$8,553	$2,690	$9,998	$321,039
Natural Gas Supply Charge ($/Mcf) - Rider A	251,483	447,502	595,378	627,497	540,898	422,254	257,864	140,398	105,461	96,683	30,402	113,006	3,628,826
Gas Adjustment Charge ($/Mcf) - Rider A	10,172	18,101	24,083	25,382	21,879	17,080	10,431	5,679	4,266	3,911	1,230	4,571	146,785
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$283,903	$505,193	$672,134	$708,393	$610,630	$476,690	$291,108	$158,498	$119,057	$109,147	$34,322	$127,575	$4,096,650
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$454,248	$758,426	$988,348	$1,038,542	$904,125	$719,174	$464,434	$281,156	$227,200	$213,605	$111,561	$239,489	$6,400,309
Unit Margin ($/Mcf)	$3.4094	$2.8483	$2.6733	$2.6483	$2.7312	$2.8905	$3.3833	$4.3974	$5.1614	$5.4382	$12.7880	$4.9848	$3.1953

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Large Commercial SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	48	48	45	44	42	44	48	48	48	48	49	48	560
Total Volume	6,218	8,999	12,023	11,320	10,045	7,674	5,070	2,912	1,938	1,723	2,344	2,779	73,045
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$7,248	$7,248	$6,795	$6,644	$6,342	$6,644	$7,248	$7,248	$7,248	$7,248	$7,399	$7,248	$84,560
Volumetric Distribution Charge	12,290	17,784	23,761	22,373	19,853	15,167	10,020	5,755	3,830	3,404	4,633	5,492	144,361
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$19,538	$25,032	$30,556	$29,017	$26,195	$21,811	$17,268	$13,003	$11,078	$10,652	$12,032	$12,740	$228,921
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$2,769	$4,007	$5,354	$5,041	$4,473	$3,417	$2,258	$1,297	$863	$767	$1,044	$1,237	$32,527
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$2,769	$4,007	$5,354	$5,041	$4,473	$3,417	$2,258	$1,297	$863	$767	$1,044	$1,237	$32,527
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$22,307	$29,039	$35,910	$34,058	$30,668	$25,228	$19,526	$14,300	$11,941	$11,419	$13,076	$13,977	$261,448
Unit Margin ($/Mcf)	$3.1419	$2.7818	$2.5415	$2.5632	$2.6077	$2.8421	$3.4059	$4.4653	$5.7164	$6.1838	$5.1328	$4.5845	$3.1340

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Large Commercial MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	724	726	728	731	726	728	729	728	723	727	732	728	8,730
Total Volume	176,681	297,655	393,301	427,544	374,958	316,259	210,251	122,784	79,620	72,567	78,823	94,556	2,644,998
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	109,324	109,626	109,928	110,381	109,626	109,928	110,079	109,928	109,173	109,777	110,532	109,928	1,318,230
Volumetric Distribution Charge	349,180	588,265	777,293	844,970	741,042	625,034	415,525	242,661	157,356	143,417	155,781	186,874	5,227,398
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$458,504	$697,891	$887,221	$955,351	$850,668	$734,962	$525,604	$352,589	$266,529	$253,194	$266,313	$296,802	$6,545,628
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$86,574	$145,851	$192,717	$209,497	$183,729	$154,967	$103,023	$60,164	$39,014	$35,558	$38,623	$46,332	$1,296,049
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$86,574	$145,851	$192,717	$209,497	$183,729	$154,967	$103,023	$60,164	$39,014	$35,558	$38,623	$46,332	$1,296,049
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$545,078	$843,742	$1,079,938	$1,164,848	$1,034,397	$889,929	$628,627	$412,753	$305,543	$288,752	$304,936	$343,134	$7,841,677
Unit Margin ($/Mcf)	$2.5951	$2.3446	$2.2558	$2.2345	$2.2687	$2.3239	$2.4999	$2.8716	$3.3475	$3.4891	$3.3786	$3.1389	$2.4747

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Large Commercial DMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	11	11	11	11	11	11	11	11	11	11	11	11	132
Total Volume	65,881	67,309	73,313	81,879	73,457	66,268	54,419	47,325	43,823	43,997	48,110	50,901	716,683
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	19,932
Volumetric Distribution Charge	130,203	133,025	144,892	161,820	145,175	130,969	107,551	93,531	86,609	86,952	95,082	100,597	1,416,404
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$131,864	$134,686	$146,553	$163,481	$146,836	$132,630	$109,212	$95,192	$88,270	$88,613	$96,743	$102,258	$1,436,336
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$131,864	$134,686	$146,553	$163,481	$146,836	$132,630	$109,212	$95,192	$88,270	$88,613	$96,743	$102,258	$1,436,336
Unit Margin ($/Mcf)	$2.0015	$2.0010	$1.9990	$1.9966	$1.9989	$2.0014	$2.0069	$2.0114	$2.0142	$2.0141	$2.0109	$2.0090	$2.0041

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Natural Gas Vehicles	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	7	7	7	7	7	7	7	7	7	7	7	7	84
Total Volume	4,885	9,917	13,001	12,472	10,628	8,616	5,145	1,694	671	438	591	1,977	70,034
Base Non Gas Cost Rate:													
Volumetric Distribution Charge	$2.17048	$2.17048	$2.17048	$2.17048	$2.17048	$2.17048	$2.17048	$2.17048	$2.17048	$2.17048	$2.17048	$2.17048	$2.17048
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Volumetric Distribution Charge	10,602	21,524	28,218	27,069	23,068	18,702	11,167	3,677	1,456	951	1,282	4,291	152,008
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$10,602	$21,524	$28,218	$27,069	$23,068	$18,702	$11,167	$3,677	$1,456	$951	$1,282	$4,291	$152,008
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03339
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$2,175	$4,416	$5,789	$5,554	$4,733	$3,837	$2,291	$754	$299	$195	$263	$880	$31,186
Natural Gas Supply Charge ($/Mcf) - Rider A	24,587	49,914	65,439	62,775	53,495	43,370	25,897	8,528	3,376	2,206	2,972	9,950	352,509
Gas Adjustment Charge ($/Mcf) - Rider A	995	2,019	2,647	2,539	2,164	1,754	1,048	345	137	89	120	402	14,259
Total Gas Cost Revenues	$27,757	$56,349	$73,875	$70,868	$60,392	$48,961	$29,236	$9,627	$3,812	$2,490	$3,355	$11,232	$397,954
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$38,359	$77,873	$102,093	$97,937	$83,460	$67,663	$40,403	$13,304	$5,268	$3,441	$4,637	$15,523	$549,962
Unit Margin ($/Mcf)	$2.1705	$2.1705	$2.1705	$2.1705	$2.1705	$2.1705	$2.1705	$2.1705	$2.1705	$2.1705	$2.1705	$2.1705	$2.1705

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Small Public Authority < 250 Sales	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	366	383	380	364	365	366	363	361	361	356	352	351	4,368
Total Volume	11,616	9,486	11,103	8,632	9,118	9,174	9,070	8,700	9,248	8,259	25,081	12,968	132,454
Base Non Gas Cost Rate:													
Basic Service Charge	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00
Volumetric Distribution Charge	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$10,980	$11,490	$11,400	$10,920	$10,950	$10,980	$10,890	$10,830	$10,830	$10,680	$10,560	$10,530	$131,040
Volumetric Distribution Charge	33,963	27,733	32,463	25,236	26,658	26,821	26,518	25,436	27,038	24,146	73,331	37,915	387,257
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	252	205	241	187	198	199	196	188	200	179	543	281	2,869
Rider H - Gas Procurement Charge	1,335	1,090	1,276	992	1,048	1,054	1,042	1,000	1,063	949	2,882	1,490	15,219
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$46,529	$40,518	$45,379	$37,335	$38,853	$39,054	$38,646	$37,455	$39,131	$35,953	$87,316	$50,216	$536,386
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44531
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$5,173	$4,224	$4,944	$3,844	$4,060	$4,085	$4,039	$3,874	$4,118	$3,678	$11,169	$5,775	$58,983
Natural Gas Supply Charge ($/Mcf) - Rider A	58,470	47,745	55,888	43,446	45,894	46,174	45,652	43,791	46,548	41,569	126,245	65,274	666,696
Gas Adjustment Charge ($/Mcf) - Rider A	2,365	1,931	2,261	1,757	1,856	1,868	1,847	1,771	1,883	1,681	5,107	2,640	26,967
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$66,008	$53,900	$63,093	$49,047	$51,810	$52,127	$51,538	$49,436	$52,549	$46,928	$142,521	$73,689	$752,646
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$112,537	$94,418	$108,472	$86,382	$90,663	$91,181	$90,184	$86,891	$91,680	$82,881	$229,837	$123,905	$1,289,032
Unit Margin ($/Mcf)	$4.0055	$4.2716	$4.0870	$4.3254	$4.2612	$4.2572	$4.2609	$4.3051	$4.2314	$4.3535	$3.4813	$3.8723	$4.0496

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Proposed Rates)

Small Public Authority < 250 SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	23	23	23	23	23	23	23	23	23	23	23	23	276
Total Volume	156	337	472	473	407	291	135	66	76	18	37	55	2,523
Base Non Gas Cost Rate:													
Basic Service Charge	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00
Volumetric Distribution Charge	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$690	$690	$690	$690	$690	$690	$690	$690	$690	$690	$690	$690	$8,280
Volumetric Distribution Charge	455	985	1,381	1,382	1,191	851	393	194	223	51	109	159	7,376
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$1,145	$1,675	$2,071	$2,072	$1,881	$1,541	$1,083	$884	$913	$741	$799	$849	$15,656
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44515
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$69	$150	$210	$210	$181	$130	$60	$30	$34	$8	$17	$24	$1,123
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$69	$150	$210	$210	$181	$130	$60	$30	$34	$8	$17	$24	$1,123
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$1,214	$1,825	$2,281	$2,282	$2,062	$1,671	$1,143	$914	$947	$749	$816	$873	$16,779
Unit Margin ($/Mcf)	$7.3563	$4.9727	$4.3843	$4.3840	$4.6170	$5.2940	$8.0533	$13.3043	$11.9556	$42.2235	$21.3836	$15.5812	$6.2058

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Proposed Rates)

Small Public Authority < 250 MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	217	212	214	230	227	228	228	232	231	236	239	239	2,733
Total Volume	1,999	4,371	6,274	6,834	5,943	4,032	2,068	926	439	327	520	974	34,706
Base Non Gas Cost Rate:													
Basic Service Charge	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00	$30.00
Volumetric Distribution Charge	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370	$2.92370
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	6,510	6,360	6,420	6,900	6,810	6,840	6,840	6,960	6,930	7,080	7,170	7,170	81,990
Volumetric Distribution Charge	5,844	12,778	18,342	19,979	17,377	11,788	6,045	2,706	1,284	957	1,522	2,847	101,469
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$12,354	$19,138	$24,762	$26,879	$24,187	$18,628	$12,885	$9,666	$8,214	$8,037	$8,692	$10,017	$183,459
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.48998
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$979	$2,142	$3,074	$3,348	$2,912	$1,976	$1,013	$454	$215	$160	$255	$477	$17,005
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$979	$2,142	$3,074	$3,348	$2,912	$1,976	$1,013	$454	$215	$160	$255	$477	$17,005
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$13,333	$21,280	$27,836	$30,227	$27,099	$20,604	$13,898	$10,120	$8,429	$8,197	$8,947	$10,494	$200,464
Unit Margin ($/Mcf)	$6.1808	$4.3789	$3.9470	$3.9334	$4.0695	$4.6202	$6.2320	$10.4427	$18.7046	$24.5455	$16.6994	$10.2868	$5.2861

National Fuel Gas Distribution Corporation
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Detailed Billed Revenue Workpapers (Proposed Rates)

Small Public Authority > 250 Sales	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	105	111	108	99	97	98	101	96	100	93	89	89	1,186
Total Volume	2,345	5,204	7,576	7,325	6,254	4,323	1,910	723	498	262	490	791	37,700
Base Non Gas Cost Rate:													
Basic Service Charge	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00
Volumetric Distribution Charge	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$5,250	$5,550	$5,400	$4,950	$4,850	$4,900	$5,050	$4,800	$5,000	$4,650	$4,450	$4,450	$59,300
Volumetric Distribution Charge	5,373	11,926	17,360	16,785	14,330	9,905	4,376	1,656	1,142	600	1,123	1,813	86,390
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	51	113	164	159	135	94	41	16	11	6	11	17	817
Rider H - Gas Procurement Charge	269	598	870	842	719	497	219	83	57	30	56	91	4,332
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$10,944	$18,186	$23,794	$22,735	$20,034	$15,396	$9,686	$6,555	$6,210	$5,286	$5,640	$6,371	$150,839
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44528
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03339
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20355
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$1,044	$2,317	$3,373	$3,262	$2,785	$1,925	$850	$322	$222	$117	$218	$352	$16,787
Natural Gas Supply Charge ($/Mcf) - Rider A	11,803	26,195	38,131	36,869	31,477	21,757	9,611	3,638	2,509	1,319	2,467	3,983	189,759
Gas Adjustment Charge ($/Mcf) - Rider A	477	1,060	1,542	1,491	1,273	880	389	147	101	53	100	161	7,674
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$13,324	$29,572	$43,046	$41,622	$35,535	$24,562	$10,850	$4,107	$2,832	$1,489	$2,785	$4,496	$214,220
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$24,268	$47,758	$66,840	$64,357	$55,569	$39,958	$20,536	$10,662	$9,042	$6,775	$8,425	$10,867	$365,059
Unit Margin ($/Mcf)	$4.6670	$3.4945	$3.1409	$3.1039	$3.2036	$3.5617	$5.0728	$9.0696	$12.4586	$20.1751	$11.5057	$8.0515	$4.0010

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Proposed Rates)

Small Public Authority > 250 SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	19	19	19	19	19	19	19	19	19	19	19	19	228
Total Volume	652	1,384	1,959	1,948	1,696	1,172	520	244	218	44	70	213	10,118
Base Non Gas Cost Rate:													
Basic Service Charge	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00	$50.00
Volumetric Distribution Charge	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$950	$950	$950	$950	$950	$950	$950	$950	$950	$950	$950	$950	$11,400
Volumetric Distribution Charge	1,494	3,170	4,490	4,463	3,887	2,685	1,191	558	500	101	159	488	23,186
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$2,444	$4,120	$5,440	$5,413	$4,837	$3,635	$2,141	$1,508	$1,450	$1,051	$1,109	$1,438	$34,586
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44514
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$290	$616	$872	$867	$755	$522	$231	$108	$97	$20	$31	$95	$4,504
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$290	$616	$872	$867	$755	$522	$231	$108	$97	$20	$31	$95	$4,504
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$2,734	$4,736	$6,312	$6,280	$5,592	$4,157	$2,372	$1,616	$1,547	$1,071	$1,140	$1,533	$39,090
Unit Margin ($/Mcf)	$3.7491	$2.9782	$2.7764	$2.7793	$2.8515	$3.1024	$4.1195	$6.1920	$6.6444	$23.8571	$15.9595	$6.7545	$3.4182

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Proposed Rates)

Small Public Authority > 250 MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	225	216	220	229	233	230	229	235	228	235	239	239	2,758
Total Volume	9,091	16,697	21,833	22,587	19,855	14,616	8,728	3,121	1,012	795	1,181	3,597	123,113
Base Non Gas Cost Rate:													
Basic Service Charge	$50.00000	$50.00000	$50.00000	$50.00000	$50.00000	$50.00000	$50.00000	$50.00000	$50.00000	$50.00000	$50.00000	$50.00000	$50.00
Volumetric Distribution Charge	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152	$2.29152
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	11,250	10,800	11,000	11,450	11,650	11,500	11,450	11,750	11,400	11,750	11,950	11,950	137,900
Volumetric Distribution Charge	20,832	38,260	50,031	51,759	45,499	33,492	20,000	7,152	2,318	1,822	2,707	8,243	282,116
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$32,082	$49,060	$61,031	$63,209	$57,149	$44,992	$31,450	$18,902	$13,718	$13,572	$14,657	$20,193	$420,016
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49001
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$4,455	$8,181	$10,698	$11,068	$9,729	$7,162	$4,277	$1,529	$496	$390	$579	$1,763	$60,327
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$4,455	$8,181	$10,698	$11,068	$9,729	$7,162	$4,277	$1,529	$496	$390	$579	$1,763	$60,327
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$36,537	$57,241	$71,729	$74,277	$66,878	$52,154	$35,727	$20,431	$14,214	$13,962	$15,236	$21,956	$480,343
Unit Margin ($/Mcf)	$3.5290	$2.9384	$2.7953	$2.7984	$2.8783	$3.0783	$3.6034	$6.0565	$13.5612	$17.0667	$12.4079	$5.6134	$3.4116

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Large Public Authority Sales	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	32	31	31	30	30	30	30	29	36	32	29	30	370
Total Volume	3,721	7,798	9,827	8,942	7,526	5,604	3,355	937	153	54	179	1,024	49,118
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$4,832	$4,681	$4,681	$4,530	$4,530	$4,530	$4,530	$4,379	$5,436	$4,832	$4,379	$4,530	$55,870
Volumetric Distribution Charge	7,354	15,411	19,421	17,672	14,874	11,076	6,631	1,851	301	107	353	2,023	97,074
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	81	169	213	194	163	121	73	20	3	1	4	22	1,064
Rider H - Gas Procurement Charge	428	896	1,129	1,027	865	644	385	108	18	6	21	118	5,644
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$12,694	$21,157	$25,444	$23,423	$20,432	$16,371	$11,619	$6,358	$5,758	$4,946	$4,757	$6,693	$159,652
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44531
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03341
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20361
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$1,657	$3,472	$4,376	$3,982	$3,351	$2,496	$1,494	$417	$68	$24	$80	$456	$21,873
Natural Gas Supply Charge ($/Mcf) - Rider A	18,728	39,249	49,462	45,008	37,883	28,208	16,887	4,714	768	273	900	5,153	247,233
Gas Adjustment Charge ($/Mcf) - Rider A	758	1,588	2,001	1,821	1,532	1,141	683	191	31	11	36	208	10,001
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$21,143	$44,309	$55,839	$50,811	$42,766	$31,845	$19,064	$5,322	$867	$308	$1,016	$5,817	$279,107
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$33,837	$65,466	$81,283	$74,234	$63,198	$48,216	$30,683	$11,680	$6,625	$5,254	$5,773	$12,510	$438,759
Unit Margin ($/Mcf)	$3.4115	$2.7132	$2.5893	$2.6195	$2.7148	$2.9212	$3.4631	$6.7885	$37.7553	$91.3058	$26.6166	$6.5377	$3.2504

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Large Public Authority SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	3	3	3	3	3	3	3	3	3	3	3	3	36
Total Volume	206	418	627	711	587	488	242	129	86	45	52	198	3,788
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$453	$453	$453	$453	$453	$453	$453	$453	$453	$453	$453	$453	$5,436
Volumetric Distribution Charge	408	827	1,239	1,404	1,160	964	479	255	169	88	102	392	7,487
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$861	$1,280	$1,692	$1,857	$1,613	$1,417	$932	$708	$622	$541	$555	$845	$12,923
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44481
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$92	$186	$279	$316	$261	$217	$108	$57	$38	$20	$23	$88	$1,685
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$92	$186	$279	$316	$261	$217	$108	$57	$38	$20	$23	$88	$1,685
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$953	$1,466	$1,971	$2,173	$1,874	$1,634	$1,040	$765	$660	$561	$578	$933	$14,608
Unit Margin ($/Mcf)	$4.1718	$3.0590	$2.6991	$2.6139	$2.7481	$2.9054	$3.8469	$5.4857	$7.2694	$12.1183	$10.7300	$4.2603	$3.4113

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Large Public Authority MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	283	282	283	284	282	282	284	284	276	281	283	283	3,387
Total Volume	114,221	201,498	272,378	311,441	275,885	245,756	163,015	88,379	44,323	37,724	38,690	50,458	1,843,767
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00
Volumetric Distribution Charge	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	42,733	42,582	42,733	42,884	42,582	42,582	42,884	42,884	41,676	42,431	42,733	42,733	511,437
Volumetric Distribution Charge	225,738	398,228	538,309	615,510	545,240	485,696	322,172	174,667	87,598	74,555	76,464	99,721	3,643,898
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$268,471	$440,810	$581,042	$658,394	$587,822	$528,278	$365,056	$217,551	$129,274	$116,986	$119,197	$142,454	$4,155,335
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$55,968	$98,734	$133,465	$152,606	$135,183	$120,421	$79,877	$43,306	$21,718	$18,485	$18,958	$24,724	$903,445
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$55,968	$98,734	$133,465	$152,606	$135,183	$120,421	$79,877	$43,306	$21,718	$18,485	$18,958	$24,724	$903,445
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$324,439	$539,544	$714,507	$811,000	$723,005	$648,699	$444,933	$260,857	$150,992	$135,471	$138,155	$167,178	$5,058,780
Unit Margin ($/Mcf)	$2.3505	$2.1877	$2.1332	$2.1140	$2.1307	$2.1496	$2.2394	$2.4616	$2.9166	$3.1011	$3.0808	$2.8232	$2.2537

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Large Public Authority DMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	3	3	3	3	3	3	3	3	3	3	3	3	36
Total Volume	20,147	22,056	26,360	25,242	27,343	19,326	14,449	3,770	7,255	15,421	11,095	10,699	203,162
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633	$1.97633
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	453	453	453	453	453	453	453	453	453	453	453	453	5,436
Volumetric Distribution Charge	39,817	43,590	52,097	49,886	54,038	38,194	28,556	7,450	14,339	30,477	21,927	21,145	401,515
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$40,270	$44,043	$52,550	$50,339	$54,491	$38,647	$29,009	$7,903	$14,792	$30,930	$22,380	$21,598	$406,951
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$40,270	$44,043	$52,550	$50,339	$54,491	$38,647	$29,009	$7,903	$14,792	$30,930	$22,380	$21,598	$406,951
Unit Margin ($/Mcf)	$1.9988	$1.9969	$1.9935	$1.9943	$1.9929	$1.9998	$2.0077	$2.0965	$2.0388	$2.0057	$2.0172	$2.0187	$2.0031

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SVIS Sales	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	125	128	127	129	131	131	129	127	125	125	124	124	1,525
Total Volume	2,913	8,338	11,665	13,202	10,070	6,980	3,442	1,295	630	303	596	759	60,192
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$10,250	$10,496	$10,414	$10,578	$10,742	$10,742	$10,578	$10,414	$10,250	$10,250	$10,168	$10,168	$125,050
Volumetric Distribution Charge	7,778	22,265	31,150	35,253	26,890	18,639	9,190	3,457	1,683	808	1,591	2,027	160,730
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	63	181	253	286	218	151	75	28	14	7	13	16	1,304
Rider H - Gas Procurement Charge	335	958	1,340	1,517	1,157	802	395	149	72	35	68	87	6,916
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$18,426	$33,900	$43,157	$47,634	$39,007	$30,334	$20,238	$14,048	$12,019	$11,099	$11,840	$12,299	$294,000
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44531
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03339
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20361
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$1,297	$3,713	$5,195	$5,879	$4,484	$3,108	$1,533	$576	$281	$135	$265	$338	$26,804
Natural Gas Supply Charge ($/Mcf) - Rider A	14,661	41,969	58,717	66,451	50,687	35,133	17,323	6,516	3,172	1,523	2,998	3,821	302,971
Gas Adjustment Charge ($/Mcf) - Rider A	593	1,698	2,375	2,688	2,050	1,421	701	264	128	62	121	155	12,256
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$16,551	$47,380	$66,287	$75,018	$57,221	$39,662	$19,557	$7,356	$3,581	$1,720	$3,384	$4,314	$342,031
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$34,977	$81,280	$109,444	$122,652	$96,228	$69,996	$39,795	$21,404	$15,600	$12,819	$15,224	$16,613	$636,031
Unit Margin ($/Mcf)	$6.3258	$4.0657	$3.6996	$3.6081	$3.8736	$4.3458	$5.8804	$10.8509	$19.0718	$36.6894	$19.8768	$16.2014	$4.8844

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SVIS SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	11	11	11	11	11	11	11	11	11	11	11	11	132
Total Volume	226	652	992	1,117	846	595	248	109	26	16	31	44	4,900
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$902	$902	$902	$902	$902	$902	$902	$902	$902	$902	$902	$902	$10,824
Volumetric Distribution Charge	602	1,741	2,648	2,982	2,259	1,589	663	290	70	42	83	117	13,086
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$1,504	$2,643	$3,550	$3,884	$3,161	$2,491	$1,565	$1,192	$972	$944	$985	$1,019	$23,910
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44527
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$100	$290	$442	$497	$377	$265	$111	$48	$12	$7	$14	$19	$2,182
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$100	$290	$442	$497	$377	$265	$111	$48	$12	$7	$14	$19	$2,182
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$1,604	$2,933	$3,992	$4,381	$3,538	$2,756	$1,676	$1,240	$984	$951	$999	$1,038	$26,092
Unit Margin ($/Mcf)	$6.6684	$4.0541	$3.5797	$3.4780	$3.7367	$4.1858	$6.3043	$10.9746	$36.8851	$60.6772	$31.7522	$23.2869	$4.8791

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SVIS MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	62	68	68	67	65	61	61	65	63	63	63	64	770
Total Volume	2,267	5,600	8,088	8,683	6,478	4,113	1,982	718	324	272	327	655	39,506
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028	$2.67028
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	5,084	5,576	5,576	5,494	5,330	5,002	5,002	5,330	5,166	5,166	5,166	5,248	63,140
Volumetric Distribution Charge	6,053	14,954	21,597	23,185	17,298	10,984	5,292	1,917	865	725	873	1,750	105,492
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$11,137	$20,530	$27,173	$28,679	$22,628	$15,986	$10,294	$7,247	$6,031	$5,891	$6,039	$6,998	$168,632
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.48998
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$1,111	$2,744	$3,963	$4,254	$3,174	$2,015	$971	$352	$159	$133	$160	$321	$19,357
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$1,111	$2,744	$3,963	$4,254	$3,174	$2,015	$971	$352	$159	$133	$160	$321	$19,357
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$12,248	$23,274	$31,136	$32,933	$25,802	$18,001	$11,265	$7,599	$6,190	$6,024	$6,199	$7,319	$187,989
Unit Margin ($/Mcf)	$4.9130	$3.6660	$3.3597	$3.3030	$3.4931	$3.8864	$5.1942	$10.0939	$18.6162	$21.6969	$18.4745	$10.6790	$4.2685

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IVIS Sales	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	56	53	54	55	53	52	53	51	58	55	55	58	653
Total Volume	10,325	19,589	26,227	29,307	25,173	18,957	12,214	6,212	5,285	3,253	3,485	6,077	166,107
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$14,112	$13,356	$13,608	$13,860	$13,356	$13,104	$13,356	$12,852	$14,616	$13,860	$13,860	$14,616	$164,556
Volumetric Distribution Charge	16,312	30,946	41,433	46,299	39,768	29,948	19,296	9,814	8,350	5,140	5,506	9,601	262,411
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	224	424	568	635	545	411	265	135	115	70	76	132	3,598
Rider H - Gas Procurement Charge	1,186	2,251	3,014	3,367	2,892	2,178	1,403	714	607	374	400	698	19,086
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$31,834	$46,977	$58,623	$64,161	$56,561	$45,641	$34,320	$23,514	$23,687	$19,444	$19,842	$25,047	$449,651
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340
Gas Adjustment Charge ($/Mcf) - Rider A	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$4,598	$8,723	$11,679	$13,050	$11,210	$8,442	$5,439	$2,766	$2,354	$1,449	$1,552	$2,706	$73,968
Natural Gas Supply Charge ($/Mcf) - Rider A	51,972	98,599	132,013	147,514	126,706	95,418	61,479	31,269	26,603	16,376	17,543	30,590	836,082
Gas Adjustment Charge ($/Mcf) - Rider A	2,102	3,988	5,340	5,967	5,125	3,860	2,487	1,265	1,076	662	710	1,237	33,819
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$58,672	$111,310	$149,032	$166,531	$143,041	$107,720	$69,405	$35,300	$30,033	$18,487	$19,805	$34,533	$943,869
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$90,506	$158,287	$207,655	$230,692	$199,602	$153,361	$103,725	$58,814	$53,720	$37,931	$39,647	$59,580	$1,393,520
Unit Margin ($/Mcf)	$3.0831	$2.3981	$2.2352	$2.1893	$2.2469	$2.4076	$2.8098	$3.7851	$4.4817	$5.9764	$5.6929	$4.1213	$2.7070

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IVIS SATC	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	3	3	3	3	3	3	3	3	3	3	3	3	36
Total Volume	342	795	947	1,008	832	696	387	158	99	98	109	185	5,658
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$756	$756	$756	$756	$756	$756	$756	$756	$756	$756	$756	$756	$9,072
Volumetric Distribution Charge	540	1,256	1,496	1,592	1,315	1,100	611	250	156	155	173	292	8,938
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$1,296	$2,012	$2,252	$2,348	$2,071	$1,856	$1,367	$1,006	$912	$911	$929	$1,048	$18,010
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44541
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$152	$354	$422	$449	$371	$310	$172	$71	$44	$44	$49	$82	$2,520
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$152	$354	$422	$449	$371	$310	$172	$71	$44	$44	$49	$82	$2,520
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$1,448	$2,366	$2,674	$2,797	$2,442	$2,166	$1,539	$1,077	$956	$955	$978	$1,130	$20,530
Unit Margin ($/Mcf)	$3.7898	$2.5307	$2.3779	$2.3297	$2.4882	$2.6652	$3.5341	$6.3508	$9.2379	$9.2603	$8.4985	$5.6639	$3.1832

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IVIS MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	268	271	271	271	274	274	274	274	267	268	268	269	3,249
Total Volume	195,005	235,685	270,037	308,686	283,815	257,929	187,364	164,387	149,320	147,127	149,938	157,821	2,507,113
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	67,536	68,292	68,292	68,292	69,048	69,048	69,048	69,048	67,284	67,536	67,536	67,788	818,748
Volumetric Distribution Charge	308,063	372,328	426,597	487,654	448,363	407,469	295,992	259,694	235,891	232,426	236,867	249,322	3,960,666
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$375,599	$440,620	$494,889	$555,946	$517,411	$476,517	$365,040	$328,742	$303,175	$299,962	$304,403	$317,110	$4,779,414
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$95,552	$115,486	$132,318	$151,256	$139,069	$126,385	$91,808	$80,550	$73,167	$72,092	$73,469	$77,332	$1,228,484
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$95,552	$115,486	$132,318	$151,256	$139,069	$126,385	$91,808	$80,550	$73,167	$72,092	$73,469	$77,332	$1,228,484
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$471,151	$556,106	$627,207	$707,202	$656,480	$602,902	$456,848	$409,292	$376,342	$372,054	$377,872	$394,442	$6,007,898
Unit Margin ($/Mcf)	$1.9261	$1.8695	$1.8327	$1.8010	$1.8231	$1.8475	$1.9483	$1.9998	$2.0304	$2.0388	$2.0302	$2.0093	$1.9063

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Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Proposed Rates)

IVIS DMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	24	24	24	24	24	24	24	24	24	24	24	24	288
Total Volume	54,117	62,029	71,279	87,132	78,033	75,170	60,981	51,344	44,999	40,448	43,225	42,443	711,200
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977	$1.57977
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	72,576
Volumetric Distribution Charge	85,492	97,991	112,605	137,649	123,274	118,752	96,336	81,111	71,088	63,899	68,285	67,051	1,123,533
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$91,540	$104,039	$118,653	$143,697	$129,322	$124,800	$102,384	$87,159	$77,136	$69,947	$74,333	$73,099	$1,196,109
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$91,540	$104,039	$118,653	$143,697	$129,322	$124,800	$102,384	$87,159	$77,136	$69,947	$74,333	$73,099	$1,196,109
Unit Margin ($/Mcf)	$1.6915	$1.6773	$1.6646	$1.6492	$1.6573	$1.6602	$1.6789	$1.6976	$1.7142	$1.7293	$1.7197	$1.7223	$1.6818

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Proposed Rates)

LVIS MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	7	7	7	7	7	7	7	7	7	7	7	7	84
Total Volume	36,901	41,126	42,306	43,391	41,676	44,060	38,786	39,540	34,576	33,708	38,286	33,646	468,000
Base Non Gas Cost Rate:													
Basic Service Charge	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00
Volumetric Distribution Charge	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	9,800	9,800	9,800	9,800	9,800	9,800	9,800	9,800	9,800	9,800	9,800	9,800	117,600
Volumetric Distribution Charge	42,236	47,072	48,422	49,664	47,701	50,430	44,394	45,256	39,575	38,581	43,821	38,510	535,661
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$52,036	$56,872	$58,222	$59,464	$57,501	$60,230	$54,194	$55,056	$49,375	$48,381	$53,621	$48,310	$653,261
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$18,081	$20,152	$20,730	$21,261	$20,421	$21,589	$19,005	$19,374	$16,942	$16,517	$18,760	$16,486	$229,318
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$18,081	$20,152	$20,730	$21,261	$20,421	$21,589	$19,005	$19,374	$16,942	$16,517	$18,760	$16,486	$229,318
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$70,117	$77,024	$78,952	$80,725	$77,922	$81,819	$73,199	$74,430	$66,317	$64,898	$72,381	$64,796	$882,579
Unit Margin ($/Mcf)	$1.4102	$1.3829	$1.3762	$1.3704	$1.3797	$1.3670	$1.3972	$1.3924	$1.4280	$1.4353	$1.4005	$1.4358	$1.3959

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Proposed Rates)

LVIS DMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	19	19	19	19	19	19	19	19	19	19	19	19	228
Total Volume	133,163	153,375	177,581	214,035	185,108	179,093	146,081	126,324	112,847	106,904	115,405	115,998	1,765,913
Base Non Gas Cost Rate:													
Basic Service Charge	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00	$1,400.00
Volumetric Distribution Charge	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458	$1.14458
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	26,600	26,600	26,600	26,600	26,600	26,600	26,600	26,600	26,600	26,600	26,600	26,600	319,200
Volumetric Distribution Charge	152,415	175,549	203,254	244,979	211,870	204,985	167,201	144,587	129,162	122,359	132,089	132,768	2,021,220
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$179,015	$202,149	$229,854	$271,579	$238,470	$231,585	$193,801	$171,187	$155,762	$148,959	$158,689	$159,368	$2,340,420
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$179,015	$202,149	$229,854	$271,579	$238,470	$231,585	$193,801	$171,187	$155,762	$148,959	$158,689	$159,368	$2,340,420
Unit Margin ($/Mcf)	$1.3443	$1.3180	$1.2944	$1.2689	$1.2883	$1.2931	$1.3267	$1.3551	$1.3803	$1.3934	$1.3751	$1.3739	$1.3253

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Proposed Rates)

LIS MMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	1	1	1	1	1	1	1	1	1	1	1	1	12
Total Volume	30,733	29,878	29,763	34,035	29,755	33,124	26,802	28,844	29,838	29,210	29,192	27,095	358,268
Base Non Gas Cost Rate:													
Basic Service Charge	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00
Volumetric Distribution Charge	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	1,700	1,700	1,700	1,700	1,700	1,700	1,700	1,700	1,700	1,700	1,700	1,700	20,400
Volumetric Distribution Charge	20,786	20,208	20,130	23,019	20,125	22,403	18,128	19,509	20,181	19,756	19,744	18,326	242,316
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$22,486	$21,908	$21,830	$24,719	$21,825	$24,103	$19,828	$21,209	$21,881	$21,456	$21,444	$20,026	$262,716
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
MMT Gas Cost Charge	$15,059	$14,640	$14,584	$16,677	$14,580	$16,231	$13,133	$14,134	$14,621	$14,313	$14,304	$13,277	$175,553
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$15,059	$14,640	$14,584	$16,677	$14,580	$16,231	$13,133	$14,134	$14,621	$14,313	$14,304	$13,277	$175,553
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$37,545	$36,548	$36,414	$41,396	$36,405	$40,334	$32,961	$35,343	$36,502	$35,769	$35,748	$33,303	$438,269
Unit Margin ($/Mcf)	$0.7317	$0.7333	$0.7335	$0.7263	$0.7335	$0.7277	$0.7398	$0.7353	$0.7333	$0.7346	$0.7346	$0.7391	$0.7333

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Proposed Rates)

LIS DMT	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	9	9	9	9	9	9	9	9	9	9	9	9	108
Total Volume	246,967	288,594	354,916	402,090	367,786	357,486	268,110	212,395	210,027	213,653	218,273	204,686	3,344,983
Base Non Gas Cost Rate:													
Basic Service Charge	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00
Volumetric Distribution Charge	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635	$0.67635
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	15,300	15,300	15,300	15,300	15,300	15,300	15,300	15,300	15,300	15,300	15,300	15,300	183,600
Volumetric Distribution Charge	167,036	195,191	240,049	271,955	248,753	241,787	181,337	143,654	142,052	144,504	147,629	138,440	2,262,389
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$182,336	$210,491	$255,349	$287,255	$264,053	$257,087	$196,637	$158,954	$157,352	$159,804	$162,929	$153,740	$2,445,989
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$182,336	$210,491	$255,349	$287,255	$264,053	$257,087	$196,637	$158,954	$157,352	$159,804	$162,929	$153,740	$2,445,989
Unit Margin ($/Mcf)	$0.7383	$0.7294	$0.7195	$0.7144	$0.7180	$0.7192	$0.7334	$0.7484	$0.7492	$0.7480	$0.7464	$0.7511	$0.7312

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Detailed Billed Revenue Workpapers (Proposed Rates)

LIS DMT Negotiated	Nov 26	Dec 26	Jan 27	Feb 27	Mar 27	Apr 27	May 27	Jun 27	Jul 27	Aug 27	Sep 27	Oct 27	Total
Customers	10	10	10	10	10	10	10	10	10	10	10	10	120
Total Volume	677,100	736,854	846,481	888,373	855,577	843,770	746,391	702,742	687,908	650,639	696,708	705,134	9,037,676
Base Non Gas Cost Rate:													
Basic Service Charge	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00	$1,700.00
Volumetric Distribution Charge	$0.29480	$0.28940	$0.28280	$0.28540	$0.28450	$0.28580	$0.29060	$0.29030	$0.32220	$0.32290	$0.32300	$0.29050	$0.29575
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	17,000	17,000	17,000	17,000	17,000	17,000	17,000	17,000	17,000	17,000	17,000	17,000	204,000
Volumetric Distribution Charge	199,609	213,245	239,385	253,542	243,412	241,149	216,901	204,006	221,644	210,091	225,037	204,841	2,672,862
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$216,609	$230,245	$256,385	$270,542	$260,412	$258,149	$233,901	$221,006	$238,644	$227,091	$242,037	$221,841	$2,876,862
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Gas Cost Revenues													
OPEB Surcredit - Rider I	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Gas Cost Revenues	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Rider B - State Tax Adjustment	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Revenues	$216,609	$230,245	$256,385	$270,542	$260,412	$258,149	$233,901	$221,006	$238,644	$227,091	$242,037	$221,841	$2,876,862
Unit Margin ($/Mcf)	$0.3199	$0.3125	$0.3029	$0.3045	$0.3044	$0.3059	$0.3134	$0.3145	$0.3469	$0.3490	$0.3474	$0.3146	$0.3183

National Fuel Gas Distribution Corporation
Pennsylvania Division
Fully Projected Future Test Year Ended October 31, 2027
Forfeited Discounts (Proposed Rates)

	Reference	Amount
Revenue Requirement	Exhibit A, Schedule A-1	19,680,000
Late Payment Charge Factor	CTM-1, Schedule 5	0.42590%
Incremental LPC Revenue		83,817
Revenue Requirement		19,680,000
Incremental LPC Revenue		(83,817)
Remaining Revenue Requirement		19,596,183
LPC Revenue at Current Rates		1,125,448
Incremental LPC Revenue		83,817
LPC Revenue at Proposed Rates		1,209,265

NATIONAL FUEL EXHIBIT CTM-3

FUTURE TEST YEAR

CURRENT RATES

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Summary of Revenues (Current Rates)

	Account	Reference	Total Revenue	Total Gas Cost	Total Delivery
Gas Sales					
Residential	480	CTM-1, Sch. 2	184,369,039	96,107,327	88,261,712
Commercial	481	""	27,724,261	16,366,271	11,357,990
Industrial	481	""	1,986,639	1,284,084	702,555
Public Authority	481	""	2,052,667	1,275,764	776,903
Subtotal			216,132,606	115,033,446	101,099,160
Transportation					
Residential	489	CTM-1, Sch. 2	8,626,227	413,160	8,213,067
Commercial	489	""	12,109,283	1,295,828	10,813,455
Industrial	489	""	14,599,445	1,127,451	13,471,994
Public Authority	489	""	5,358,724	725,224	4,633,500
Subtotal			40,693,679	3,561,663	37,132,016
Total Billed Revenue			256,826,285	118,595,109	138,231,177
Other Operating Revenues					
Forfeited Discounts	487	CTM-1, Sch. 5	1,208,090	0	1,208,090
Rent From Gas Property	493		100,267	0	100,267
Other Gas Revenues	495		47,653	0	47,653
Subtotal			1,356,010	0	1,356,010
Total Operating Revenue			258,182,295	118,595,109	139,587,186

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Summary of Revenues by Service Class (Current Rates)

	Account	Reference (CTM-2, Sch. 4)	Average Customers	Total Usage (Mcf)	Total Revenue	Total Gas Cost	Total Delivery
Residential Sales	480	Page 1	173,999	16,501,733	177,284,180	92,390,814	84,893,366
Residential CAP	480	Page 2	6,467	678,491	7,084,859	3,716,513	3,368,346
Residential SATC	489	Page 3	16,528	1,584,984	8,145,721	369,241	7,776,480
Residential MMT	489	Page 4	474	114,750	480,507	43,919	436,588
Total Residential			197,467	18,879,957	192,995,266	96,520,487	96,474,780
Small Commercial < 250 Sales	481	Page 5	8,117	896,928	10,015,585	5,006,137	5,009,448
Small Commercial < 250 SATC	489	Page 6	656	77,242	432,287	26,251	406,036
Small Commercial < 250 MMT	489	Page 7	1,055	144,547	761,718	59,569	702,149
Small Commercial > 250 Sales	481	Page 8	2,668	1,238,053	10,950,356	6,897,310	4,053,046
Small Commercial > 250 SATC	489	Page 9	266	124,996	431,348	40,966	390,382
Small Commercial > 250 MMT	489	Page 10	1,125	643,436	2,143,060	246,544	1,896,516
Large Commercial	481	Page 11	428	716,414	6,155,300	4,008,843	2,146,457
Large Commercial SATC	489	Page 12	47	73,103	240,494	25,777	214,717
Large Commercial MMT	489	Page 13	726	2,641,126	6,923,789	981,547	5,942,242
Large Commercial DMT	489	Page 14	11	716,683	1,176,588	(84,826)	1,261,414
Natural Gas Vechicles	481	Page 15	7	79,802	603,021	453,981	149,040
Total Commercial			15,107	7,352,328	39,833,544	17,662,099	22,171,445
Small Public Authority < 250 Sales	481	Page 16	379	132,038	1,201,593	738,925	462,668
Small Public Authority < 250 SATC	489	Page 17	23	2,523	14,659	856	13,803
Small Public Authority < 250 MMT	489	Page 18	204	31,199	156,284	12,858	143,426
Small Public Authority > 250 Sales	481	Page 19	116	39,148	360,902	218,017	142,885
Small Public Authority > 250 SATC	489	Page 20	19	10,118	33,739	3,313	30,426
Small Public Authority > 250 MMT	489	Page 21	211	112,995	382,588	43,297	339,291
Large Public Authority	481	Page 22	34	56,990	490,173	318,822	171,351
Large Public Authority SATC	489	Page 23	3	3,788	13,553	1,336	12,217
Large Public Authority MMT	489	Page 24	283	1,850,205	4,424,782	687,610	3,737,172
Large Public Authority DMT	489	Page 25	3	203,162	333,118	(24,046)	357,164
Total Public Authority			1,276	2,442,165	7,411,391	2,000,988	5,410,403
SVIS Sales	481	Page 26	125	59,062	595,428	332,094	263,334
SVIS SATC	489	Page 27	11	4,900	23,723	1,880	21,843
SVIS MMT	489	Page 28	62	38,326	164,401	17,967	146,434
IVIS Sales	481	Page 29	56	171,352	1,391,211	951,990	439,221
IVIS SATC	489	Page 30	3	5,658	19,072	1,762	17,310
IVIS MMT	489	Page 31	271	2,500,356	5,403,158	1,073,403	4,329,755
IVIS DMT	489	Page 32	24	711,214	1,021,500	(43,172)	1,064,672
LVIS MMT	489	Page 33	7	467,907	785,072	196,067	589,005
LVIS DMT	489	Page 34	19	1,743,516	1,980,018	(123,737)	2,103,755
LIS MMT	489	Page 35	1	349,999	399,822	166,683	233,139
LIS DMT	489	Page 36	9	3,230,556	2,103,760	(44,484)	2,148,244
LIS DMT Negotiated	489	Page 37	10	8,635,986	2,698,919	(118,918)	2,817,837
Total Industrial			598	17,918,832	16,586,084	2,411,535	14,174,549
Grand Total			**214,448**	**46,593,282**	**256,826,285**	**118,595,109**	**138,231,177**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Billed Delivery Revenues by Rate Type (Current Rates)

	Account	Reference (CTM-2, Sch. 4)	Basic Service Charge	Distribution Charge	Rider B	DSIC	Rider E	Rider G	Rider H	Total Delivery
Residential Sales	480	Page 1	29,231,761	48,863,281	(144,565)	3,486,647	0	1,560,194	1,896,049	84,893,366
Residential CAP	480	Page 2	1,086,383	2,009,080	(5,736)	136,494	0	64,166	77,959	3,368,346
Residential SATC	489	Page 3	2,776,706	4,693,295	(13,243)	319,722	0	0	0	7,776,480
Residential MMT	489	Page 4	79,676	339,785	(743)	17,870	0	0	0	436,588
Total Residential			33,174,526	55,905,441	(164,287)	3,960,733	0	1,624,360	1,974,008	96,474,780
Small Commercial < 250 Sales	481	Page 5	2,629,962	2,062,397	(8,530)	206,587	0	15,975	103,057	5,009,448
Small Commercial < 250 SATC	489	Page 6	212,436	177,609	(690)	16,681	0	0	0	406,036
Small Commercial < 250 MMT	489	Page 7	341,955	332,371	(1,197)	29,020	0	0	0	702,149
Small Commercial > 250 Sales	481	Page 8	1,184,666	2,544,817	(6,901)	166,153	0	22,058	142,252	4,053,046
Small Commercial > 250 SATC	489	Page 9	118,178	256,929	(665)	15,940	0	0	0	390,382
Small Commercial > 250 MMT	489	Page 10	499,463	1,322,583	(3,229)	77,699	0	0	0	1,896,516
Large Commercial	481	Page 11	775,536	1,190,823	(3,656)	88,675	0	12,764	82,316	2,146,457
Large Commercial SATC	489	Page 12	84,711	121,512	(366)	8,860	0	0	0	214,717
Large Commercial MMT	489	Page 13	1,316,116	4,390,080	(10,121)	246,167	0	0	0	5,942,242
Large Commercial DMT	489	Page 14	19,932	1,191,270	(2,148)	52,360	0	0	0	1,261,414
Natural Gas Vechicles	481	Page 15	0	143,274	(255)	6,020	0	0	0	149,040
Total Commercial			7,182,955	13,733,664	(37,758)	914,161	0	50,797	327,625	22,171,445
Small Public Authority < 250 Sales	481	Page 16	122,823	303,608	(788)	19,496	0	2,358	15,171	462,668
Small Public Authority < 250 SATC	489	Page 17	7,452	5,801	(22)	572	0	0	0	13,803
Small Public Authority < 250 MMT	489	Page 18	65,988	71,739	(245)	5,945	0	0	0	143,426
Small Public Authority > 250 Sales	481	Page 19	51,615	80,469	(243)	5,848	0	697	4,498	142,885
Small Public Authority > 250 SATC	489	Page 20	8,436	20,798	(52)	1,245	0	0	0	30,426
Small Public Authority > 250 MMT	489	Page 21	93,721	232,262	(579)	13,888	0	0	0	339,291
Large Public Authority	481	Page 22	62,363	94,728	(292)	6,988	0	1,015	6,548	171,351
Large Public Authority SATC	489	Page 23	5,436	6,297	(21)	506	0	0	0	12,217
Large Public Authority MMT	489	Page 24	513,098	3,075,410	(6,363)	155,026	0	0	0	3,737,172
Large Public Authority DMT	489	Page 25	5,436	337,695	(608)	14,640	0	0	0	357,164
Total Public Authority			936,368	4,228,806	(9,213)	224,154	0	4,071	26,217	5,410,403
SVIS Sales	481	Page 26	122,672	122,389	(448)	10,883	0	1,052	6,786	263,334
SVIS SATC	489	Page 27	10,824	10,155	(39)	904	0	0	0	21,843
SVIS MMT	489	Page 28	61,254	79,419	(248)	6,009	0	0	0	146,434
IVIS Sales	481	Page 29	170,352	228,704	(748)	18,171	0	3,054	19,688	439,221
IVIS SATC	489	Page 30	9,072	7,551	(31)	717	0	0	0	17,310
IVIS MMT	489	Page 31	819,000	3,337,225	(7,374)	180,903	0	0	0	4,329,755
IVIS DMT	489	Page 32	72,576	949,257	(1,812)	44,651	0	0	0	1,064,672
LVIS MMT	489	Page 33	85,932	479,277	(1,001)	24,797	0	0	0	589,005
LVIS DMT	489	Page 34	233,244	1,785,883	(3,583)	88,211	0	0	0	2,103,755
LIS MMT	489	Page 35	13,980	209,754	(396)	9,801	0	0	0	233,139
LIS DMT	489	Page 36	125,820	1,936,072	(3,658)	90,010	0	0	0	2,148,244
LIS DMT Negotiated	489	Page 37	139,800	2,564,333	(4,798)	118,502	0	0	0	2,817,837
Total Industrial			1,864,526	11,710,020	(24,136)	593,559	0	4,105	26,475	14,174,549
Grand Total			**43,158,375**	**85,577,932**	**(235,394)**	**5,692,606**	**0**	**1,683,333**	**2,354,325**	**138,231,177**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Detailed Billed Revenue Workpapers (Current Rates)

Residential Sales Service	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	171,166	171,990	173,698	174,567	175,271	176,003	175,931	174,946	174,192	174,020	173,276	172,922	2,087,983
Total Volume	525,681	1,222,673	2,247,666	2,868,059	2,859,720	2,496,202	1,893,466	1,175,381	486,914	246,821	218,596	260,555	16,501,733
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.09800	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09455
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.28%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$2,396,325	$2,407,854	$2,431,775	$2,443,940	$2,453,797	$2,464,045	$2,463,038	$2,449,238	$2,438,691	$2,436,286	$2,425,866	$2,420,906	$29,231,761
Volumetric Distribution Charge	1,556,593	3,620,456	6,655,564	8,492,609	8,467,917	7,391,504	5,606,742	3,480,420	1,441,801	730,861	647,284	771,529	48,863,281
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	51,518	115,461	212,255	270,841	270,054	235,725	178,807	110,995	45,981	23,308	20,643	24,605	1,560,194
Rider H - Gas Procurement Charge	60,401	140,485	258,257	329,540	328,582	286,814	217,559	135,051	55,946	28,360	25,117	29,938	1,896,049
DSIC - Distribution System Improvement Charge	134,546	208,009	316,365	490,320	489,615	441,069	421,614	307,550	198,324	160,941	155,945	162,349	3,486,647
Total Base Non Gas Cost Rate Revenue	$4,199,382	$6,492,266	$9,874,216	$12,027,250	$12,009,964	$10,819,157	$8,887,760	$6,483,254	$4,180,744	$3,379,756	$3,274,855	$3,409,327	$85,037,931
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44535
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03911
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20420
Rider F - CAP Discount Charge	$0.13140	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12259
OPEB Surcredit ($/Mcf) - Rider I	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$234,927	$544,456	$1,000,886	$1,277,147	$1,273,433	$1,111,559	$843,160	$523,397	$216,823	$109,909	$97,341	$116,025	$7,349,063
Natural Gas Supply Charge ($/Mcf) - Rider A	2,740,163	6,154,200	11,313,403	14,436,088	14,394,115	12,564,384	9,530,571	5,916,161	2,450,833	1,242,348	1,100,280	1,311,476	83,154,022
Gas Adjustment Charge ($/Mcf) - Rider A	116,859	248,936	457,625	583,937	582,239	508,227	385,510	239,308	99,136	50,253	44,506	53,049	3,369,585
Rider F - CAP Discount Charge	69,074	149,533	274,890	350,764	349,744	305,286	231,571	143,749	59,550	30,186	26,734	31,866	2,022,946
OPEB Surcredit - Rider I	(111,649)	(259,683)	(477,382)	(609,147)	(607,376)	(530,168)	(402,153)	(249,639)	(103,416)	(52,422)	(46,428)	(55,339)	(3,504,802)
Total Gas Cost Revenues	$3,049,374	$6,837,442	$12,569,422	$16,038,789	$15,992,155	$13,959,288	$10,588,659	$6,572,976	$2,722,926	$1,380,274	$1,222,433	$1,457,077	$92,390,814
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($7,139)	($11,037)	($16,786)	($20,446)	($20,417)	($18,393)	($15,109)	($11,022)	($7,107)	($5,746)	($5,567)	($5,796)	($144,565)
Total Revenues	$7,241,618	$13,318,670	$22,426,851	$28,045,592	$27,981,702	$24,760,052	$19,461,310	$13,045,209	$6,896,563	$4,754,284	$4,491,722	$4,860,608	$177,284,180
Unit Margin ($/Mcf)	$7.9885	$5.3099	$4.3931	$4.1935	$4.1997	$4.3342	$4.6939	$5.5159	$8.5862	$13.6931	$14.9813	$13.0849	$5.1533

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Detailed Billed Revenue Workpapers (Current Rates)

Residential CAP	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	8,041	7,500	7,103	6,953	6,591	6,017	5,865	6,278	6,200	5,655	5,680	5,715	77,599
Total Volume	26,222	56,662	101,063	124,261	117,536	93,759	67,892	48,239	19,190	8,100	7,048	8,521	678,491
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.09800	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09443	$0.09457
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.22%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$112,567	$105,004	$99,445	$97,335	$92,280	$84,238	$82,117	$87,897	$86,799	$79,171	$79,514	$80,016	$1,086,383
Volumetric Distribution Charge	77,645	167,782	299,258	367,948	348,037	277,629	201,034	142,840	56,823	23,984	20,871	25,230	2,009,080
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	2,570	5,351	9,544	11,734	11,099	8,854	6,411	4,555	1,812	765	666	805	64,166
Rider H - Gas Procurement Charge	3,013	6,510	11,612	14,278	13,505	10,773	7,801	5,543	2,205	931	810	979	77,959
DSIC - Distribution System Improvement Charge	6,481	9,422	13,897	20,880	19,759	16,213	14,809	11,994	7,352	5,243	5,093	5,351	136,494
Total Base Non Gas Cost Rate Revenue	$202,275	$294,070	$433,756	$512,175	$484,680	$397,707	$312,171	$252,828	$154,992	$110,093	$106,953	$112,381	$3,374,082
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44536
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.04032
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20432
OPEB Surcredit ($/Mcf) - Rider I	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$11,718	$25,232	$45,003	$55,333	$52,339	$41,751	$30,232	$21,481	$8,545	$3,607	$3,139	$3,794	$302,174
Natural Gas Supply Charge ($/Mcf) - Rider A	136,682	285,203	508,691	625,453	591,608	471,924	341,725	242,805	96,590	40,769	35,477	42,887	3,419,814
Gas Adjustment Charge ($/Mcf) - Rider A	5,829	11,536	20,576	25,299	23,930	19,089	13,823	9,821	3,907	1,649	1,435	1,735	138,629
OPEB Surcredit - Rider I	(5,569)	(12,034)	(21,465)	(26,392)	(24,964)	(19,913)	(14,419)	(10,245)	(4,076)	(1,720)	(1,497)	(1,810)	(144,104)
Total Gas Cost Revenues	$148,660	$309,937	$552,805	$679,693	$642,913	$512,851	$371,361	$263,862	$104,966	$44,305	$38,554	$46,606	$3,716,513
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($344)	($500)	($737)	($871)	($824)	($676)	($531)	($430)	($263)	($187)	($182)	($191)	($5,736)
Total Revenues	$350,591	$603,507	$985,824	$1,190,997	$1,126,769	$909,882	$683,001	$516,260	$259,695	$154,211	$145,325	$158,796	$7,084,859
Unit Margin ($/Mcf)	$7.7141	$5.1899	$4.2919	$4.1218	$4.1237	$4.2418	$4.5981	$5.2412	$8.0768	$13.5923	$15.1743	$13.1894	$4.9729

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Detailed Billed Revenue Workpapers (Current Rates)

Residential SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	16,372	16,253	16,214	16,262	16,258	16,327	16,376	16,572	16,739	16,836	17,022	17,107	198,336
Total Volume	52,458	118,265	215,981	274,651	271,934	236,922	180,861	114,594	47,366	24,474	21,795	25,684	1,584,984
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.28%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$229,208	$227,542	$226,991	$227,668	$227,608	$228,576	$229,262	$232,005	$234,343	$235,701	$238,304	$239,500	$2,776,706
Volumetric Distribution Charge	155,332	350,194	639,541	813,268	805,225	701,548	535,547	339,325	140,255	72,470	64,537	76,054	4,693,295
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	12,728	19,123	28,682	44,240	43,895	39,530	38,087	28,452	18,655	15,409	15,142	15,778	319,722
Total Base Non Gas Cost Rate Revenue	$397,268	$596,858	$895,214	$1,085,175	$1,076,729	$969,655	$802,896	$599,782	$393,253	$323,579	$317,982	$331,332	$7,789,723
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44535
OPEB Surcredit ($/Mcf) - Rider I	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$23,443	$52,663	$96,176	$122,302	$121,092	$105,501	$80,537	$51,029	$21,092	$10,898	$9,705	$11,437	$705,875
OPEB Surcredit - Rider I	(11,141)	(25,118)	(45,872)	(58,333)	(57,756)	(50,320)	(38,413)	(24,339)	(10,060)	(5,198)	(4,629)	(5,455)	(336,634)
Total Gas Cost Revenues	$12,302	$27,545	$50,304	$63,969	$63,336	$55,181	$42,124	$26,690	$11,032	$5,700	$5,076	$5,982	$369,241
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($675)	($1,015)	($1,522)	($1,845)	($1,830)	($1,648)	($1,365)	($1,020)	($669)	($550)	($541)	($563)	($13,243)
Total Revenues	$408,895	$623,388	$943,996	$1,147,299	$1,138,235	$1,023,188	$843,655	$625,452	$403,616	$328,729	$322,517	$336,751	$8,145,721
Unit Margin ($/Mcf)	$7.5731	$5.0468	$4.1449	$3.9511	$3.9595	$4.0927	$4.4393	$5.2340	$8.3025	$13.2214	$14.5898	$12.9001	$4.9147

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Residential MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	457	459	462	462	464	465	467	466	467	508	508	506	5,691
Total Volume	2,769	7,958	14,881	20,189	21,125	18,601	14,148	8,375	3,149	1,233	991	1,329	114,750
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.26%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	6,405	6,428	6,468	6,473	6,491	6,509	6,543	6,528	6,538	7,109	7,106	7,079	79,676
Volumetric Distribution Charge	8,200	23,564	44,065	59,783	62,554	55,080	41,894	24,799	9,326	3,651	2,935	3,936	339,785
DSIC - Distribution System Improvement Charge	483	993	1,673	2,816	2,934	2,618	2,412	1,560	790	538	502	551	17,870
Total Base Non Gas Cost Rate Revenue	$15,088	$30,984	$52,205	$69,072	$71,979	$64,206	$50,849	$32,887	$16,654	$11,298	$10,542	$11,565	$437,331
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49001
OPEB Surcredit ($/Mcf) - Rider I	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10727)
Gas Cost Revenues													
MMT Gas Cost Charge	$1,357	$3,899	$7,292	$9,893	$10,351	$9,115	$6,933	$4,104	$1,543	$604	$486	$651	$56,228
OPEB Surcredit - Rider I	($297)	($854)	($1,596)	($2,166)	($2,266)	($1,995)	($1,518)	($898)	($338)	($132)	($106)	($143)	($12,309)
Total Gas Cost Revenues	$1,060	$3,045	$5,696	$7,727	$8,085	$7,120	$5,415	$3,206	$1,205	$472	$380	$508	$43,919
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($26)	($53)	($89)	($117)	($122)	($109)	($86)	($56)	($28)	($19)	($18)	($20)	($743)
Total Revenues	$16,122	$33,976	$57,812	$76,682	$79,942	$71,217	$56,178	$36,037	$17,831	$11,751	$10,904	$12,053	$480,507
Unit Margin ($/Mcf)	$5.4487	$3.8936	$3.5081	$3.4212	$3.4073	$3.4517	$3.5941	$3.9269	$5.2879	$9.1629	$10.6377	$8.7005	$3.8112

National Fuel Gas Distribution Corporation
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Detailed Billed Revenue Workpapers (Current Rates)

Small Commercial < 250 Sales	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	7,920	8,023	8,165	8,248	8,277	8,251	8,234	8,192	8,116	8,028	7,982	7,970	97,406
Total Volume	20,801	64,680	130,415	170,612	169,957	145,567	107,071	61,915	18,086	2,894	1,166	3,763	896,928
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01847	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01781
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.29%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$213,840	$216,621	$220,455	$222,696	$223,479	$222,777	$222,318	$221,184	$219,132	$216,756	$215,514	$215,190	$2,629,962
Volumetric Distribution Charge	47,831	148,726	299,876	392,305	390,799	334,716	246,199	142,367	41,588	6,654	2,682	8,653	2,062,397
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	384	1,151	2,321	3,036	3,024	2,590	1,905	1,102	322	52	21	67	15,975
Rider H - Gas Procurement Charge	2,390	7,432	14,985	19,603	19,528	16,726	12,302	7,114	2,078	332	134	432	103,057
DSIC - Distribution System Improvement Charge	8,753	12,377	17,796	27,100	27,065	24,514	24,040	18,514	13,103	11,190	10,918	11,217	206,587
Total Base Non Gas Cost Rate Revenue	$273,198	$386,306	$555,433	$664,740	$663,896	$601,324	$506,765	$390,281	$276,223	$234,984	$229,268	$235,560	$5,017,978
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44534
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03755
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20403
OPEB Surcredit ($/Mcf) - Rider I	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$9,296	$28,802	$58,074	$75,973	$75,682	$64,821	$47,679	$27,571	$8,054	$1,289	$519	$1,676	$399,436
Natural Gas Supply Charge ($/Mcf) - Rider A	108,429	325,561	656,431	858,758	855,461	732,696	538,932	311,642	91,036	14,566	5,871	18,942	$4,518,325
Gas Adjustment Charge ($/Mcf) - Rider A	4,624	13,169	26,552	34,737	34,603	29,637	21,800	12,606	3,682	589	237	766	$183,002
OPEB Surcredit - Rider I	(2,195)	(6,824)	(13,759)	(18,000)	(17,930)	(15,357)	(11,296)	(6,532)	(1,908)	(305)	(123)	(397)	(94,626)
Total Gas Cost Revenues	$120,154	$360,708	$727,298	$951,468	$947,816	$811,797	$597,115	$345,287	$100,864	$16,139	$6,504	$20,987	$5,006,137
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($464)	($657)	($944)	($1,130)	($1,129)	($1,022)	($862)	($663)	($470)	($399)	($390)	($400)	($8,530)
Total Revenues	$392,888	$746,357	$1,281,787	$1,615,078	$1,610,583	$1,412,099	$1,103,018	$734,905	$376,617	$250,724	$235,382	$256,147	$10,015,585
Unit Margin ($/Mcf)	$13.1336	$5.9726	$4.2590	$3.8962	$3.9063	$4.1309	$4.7330	$6.3035	$15.2724	$81.2032	$196.5529	$62.5941	$5.5946

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Detailed Billed Revenue Workpapers (Current Rates)

Small Commercial < 250 SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	684	687	680	675	667	644	645	643	640	640	633	630	7,868
Total Volume	1,977	5,912	11,506	14,764	14,483	12,026	8,901	5,193	1,583	325	179	392	77,242
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.28%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$18,468	$18,549	$18,360	$18,225	$18,009	$17,388	$17,415	$17,361	$17,280	$17,280	$17,091	$17,010	$212,436
Volumetric Distribution Charge	4,546	13,595	26,457	33,949	33,302	27,652	20,468	11,941	3,640	747	411	902	177,609
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	762	1,064	1,483	2,217	2,181	1,914	1,887	1,459	1,042	901	875	896	16,681
Total Base Non Gas Cost Rate Revenue	$23,776	$33,208	$46,300	$54,391	$53,492	$46,954	$39,769	$30,761	$21,961	$18,928	$18,377	$18,808	$406,726
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44537
OPEB Surcredit ($/Mcf) - Rider I	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10551)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$884	$2,633	$5,124	$6,575	$6,449	$5,355	$3,964	$2,312	$705	$145	$80	$175	$34,401
OPEB Surcredit - Rider I	(209)	(624)	(1,214)	(1,558)	(1,528)	(1,269)	(939)	(548)	(167)	(34)	(19)	(41)	(8,150)
Total Gas Cost Revenues	$675	$2,009	$3,910	$5,017	$4,921	$4,086	$3,025	$1,764	$538	$111	$61	$134	$26,251
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($40)	($56)	($79)	($92)	($91)	($80)	($68)	($52)	($37)	($32)	($31)	($32)	($690)
Total Revenues	$24,411	$35,161	$50,131	$59,316	$58,322	$50,960	$42,726	$32,473	$22,462	$19,007	$18,407	$18,910	$432,287
Unit Margin ($/Mcf)	$12.0257	$5.6166	$4.0240	$3.6840	$3.6934	$3.9045	$4.4678	$5.9235	$13.8747	$58.2727	$102.7975	$47.9319	$5.2656

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Detailed Billed Revenue Workpapers (Current Rates)

Small Commercial < 250 MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	1,033	1,042	1,049	1,059	1,061	1,044	1,051	1,056	1,061	1,062	1,073	1,074	12,665
Total Volume	3,196	8,727	18,568	28,236	30,042	23,837	16,186	7,520	3,002	1,886	1,439	1,909	144,547
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.30%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	27,891	28,134	28,323	28,593	28,647	28,188	28,377	28,512	28,647	28,674	28,971	28,998	341,955
Volumetric Distribution Charge	7,348	20,067	42,695	64,925	69,079	54,810	37,218	17,292	6,902	4,336	3,310	4,390	332,371
DSIC - Distribution System Improvement Charge	1,166	1,595	2,351	3,975	4,153	3,527	3,267	2,281	1,770	1,650	1,614	1,669	29,020
Total Base Non Gas Cost Rate Revenue	$36,405	$49,796	$73,369	$97,492	$101,879	$86,526	$68,862	$48,085	$37,320	$34,660	$33,895	$35,057	$703,346
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07789)
Gas Cost Revenues													
MMT Gas Cost Charge	$1,566	$4,276	$9,098	$13,835	$14,721	$11,680	$7,931	$3,685	$1,471	$924	$705	$936	$70,828
OPEB Surcredit - Rider I	(249)	(680)	(1,446)	(2,199)	(2,340)	(1,856)	(1,261)	(586)	(234)	(147)	(112)	(149)	(11,259)
Total Gas Cost Revenues	$1,317	$3,596	$7,652	$11,636	$12,381	$9,824	$6,670	$3,099	$1,237	$777	$593	$787	$59,569
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($62)	($85)	($125)	($166)	($173)	($147)	($117)	($82)	($63)	($59)	($58)	($60)	($1,197)
Total Revenues	$37,660	$53,307	$80,896	$108,962	$114,087	$96,203	$75,415	$51,102	$38,494	$35,378	$34,430	$35,784	$761,718
Unit Margin ($/Mcf)	$11.3924	$5.7060	$3.9514	$3.4528	$3.3912	$3.6299	$4.2544	$6.3941	$12.4326	$18.3817	$23.5474	$18.3622	$4.8659

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Detailed Billed Revenue Workpapers (Current Rates)

Small Commercial > 250 Sales	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	2,626	2,633	2,653	2,665	2,675	2,688	2,699	2,700	2,683	2,674	2,662	2,660	32,018
Total Volume	39,818	91,659	168,332	214,506	213,938	186,805	142,280	89,162	36,861	18,644	16,474	19,574	1,238,053
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01847	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01782
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.27%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$97,162	$97,421	$98,161	$98,605	$98,975	$99,456	$99,863	$99,900	$99,271	$98,938	$98,494	$98,420	$1,184,666
Volumetric Distribution Charge	81,847	188,405	346,007	440,917	439,749	383,977	292,456	183,272	75,768	38,324	33,862	40,234	2,544,817
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	735	1,631	2,996	3,817	3,807	3,324	2,532	1,587	656	332	293	348	22,058
Rider H - Gas Procurement Charge	4,575	10,532	19,341	24,647	24,581	21,464	16,348	10,245	4,235	2,142	1,893	2,249	142,252
DSIC - Distribution System Improvement Charge	6,101	9,863	15,441	24,139	24,102	21,599	20,478	14,691	8,961	6,987	6,727	7,063	166,153
Total Base Non Gas Cost Rate Revenue	$190,420	$307,852	$481,947	$592,125	$591,215	$529,821	$431,676	$309,695	$188,891	$146,722	$141,269	$148,314	$4,059,947
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44535
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03916
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20420
OPEB Surcredit ($/Mcf) - Rider I	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$17,795	$40,816	$74,958	$95,519	$95,267	$83,184	$63,357	$39,704	$16,414	$8,302	$7,336	$8,716	$551,368
Natural Gas Supply Charge ($/Mcf) - Rider A	207,557	461,357	847,285	1,079,693	1,076,835	940,263	716,150	448,787	185,537	93,845	82,919	98,522	6,238,750
Gas Adjustment Charge ($/Mcf) - Rider A	8,852	18,662	34,272	43,673	43,558	38,033	28,968	18,153	7,505	3,796	3,354	3,985	252,811
OPEB Surcredit - Rider I	(4,683)	(10,781)	(19,799)	(25,230)	(25,163)	(21,972)	(16,735)	(10,487)	(4,336)	(2,193)	(1,938)	(2,302)	(145,619)
Total Gas Cost Revenues	$229,521	$510,054	$936,716	$1,193,655	$1,190,497	$1,039,508	$791,740	$496,157	$205,120	$103,750	$91,671	$108,921	$6,897,310
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($324)	($523)	($819)	($1,007)	($1,005)	($901)	($734)	($526)	($321)	($249)	($240)	($252)	($6,901)
Total Revenues	$419,617	$817,383	$1,417,844	$1,784,773	$1,780,707	$1,568,428	$1,222,682	$805,326	$393,690	$250,223	$232,700	$256,983	$10,950,356
Unit Margin ($/Mcf)	$4.7822	$3.3587	$2.8631	$2.7604	$2.7635	$2.8362	$3.0340	$3.4734	$5.1244	$7.8695	$8.5754	$7.5772	$3.2793

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Detailed Billed Revenue Workpapers (Current Rates)

Small Commercial > 250 SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	282	284	281	271	267	267	263	257	254	254	257	257	3,194
Total Volume	4,604	9,966	17,532	21,315	20,861	18,195	13,715	8,572	3,799	2,159	1,995	2,282	124,996
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.25%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$10,434	$10,508	$10,397	$10,027	$9,879	$9,879	$9,731	$9,509	$9,398	$9,398	$9,509	$9,509	$118,178
Volumetric Distribution Charge	9,463	20,486	36,038	43,813	42,880	37,401	28,191	17,619	7,808	4,438	4,100	4,691	256,929
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	659	1,026	1,537	2,288	2,242	2,009	1,889	1,351	857	692	680	710	15,940
Total Base Non Gas Cost Rate Revenue	$20,556	$32,020	$47,971	$56,129	$55,001	$49,289	$39,810	$28,479	$18,063	$14,528	$14,290	$14,910	$391,047
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44535
OPEB Surcredit ($/Mcf) - Rider I	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11761)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$2,057	$4,438	$7,807	$9,492	$9,289	$8,102	$6,107	$3,817	$1,692	$962	$888	$1,016	$55,667
OPEB Surcredit - Rider I	(541)	(1,172)	(2,062)	(2,507)	(2,454)	(2,140)	(1,613)	(1,008)	(447)	(254)	(235)	(268)	(14,701)
Total Gas Cost Revenues	$1,516	$3,266	$5,745	$6,985	$6,835	$5,962	$4,494	$2,809	$1,245	$708	$653	$748	$40,966
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($35)	($54)	($82)	($95)	($94)	($84)	($68)	($48)	($31)	($25)	($24)	($25)	($665)
Total Revenues	$22,037	$35,232	$53,634	$63,019	$61,742	$55,167	$44,236	$31,240	$19,277	$15,211	$14,919	$15,633	$431,348
Unit Margin ($/Mcf)	$4.4649	$3.2128	$2.7362	$2.6333	$2.6365	$2.7089	$2.9027	$3.3224	$4.7551	$6.7282	$7.1634	$6.5333	$3.1285

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

Small Commercial > 250 MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	1,106	1,107	1,111	1,113	1,110	1,125	1,134	1,136	1,133	1,138	1,143	1,143	13,499
Total Volume	21,036	47,884	87,223	110,753	109,705	96,684	74,027	46,586	19,544	10,146	9,099	10,749	643,436
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.26%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	40,922	40,959	41,107	41,181	41,070	41,625	41,958	42,032	41,921	42,106	42,291	42,291	499,463
Volumetric Distribution Charge	43,239	98,425	179,288	227,653	225,499	198,734	152,162	95,757	40,174	20,855	18,704	22,095	1,322,583
DSIC - Distribution System Improvement Charge	2,786	4,614	7,295	11,425	11,329	10,215	9,667	6,862	4,088	3,148	3,050	3,219	77,699
Total Base Non Gas Cost Rate Revenue	$86,946	$143,997	$227,690	$280,259	$277,898	$250,574	$203,787	$144,651	$86,183	$66,109	$64,044	$67,605	$1,899,745
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)
Gas Cost Revenues													
MMT Gas Cost Charge	$10,307	$23,463	$42,739	$54,269	$53,755	$47,375	$36,273	$22,827	$9,577	$4,971	$4,459	$5,267	$315,282
OPEB Surcredit - Rider I	(2,247)	(5,115)	(9,318)	(11,832)	(11,720)	(10,329)	(7,908)	(4,977)	(2,088)	(1,084)	(972)	(1,148)	(68,738)
Total Gas Cost Revenues	$8,060	$18,348	$33,421	$42,437	$42,035	$37,046	$28,365	$17,850	$7,489	$3,887	$3,487	$4,119	$246,544
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($148)	($245)	($387)	($476)	($472)	($426)	($346)	($246)	($147)	($112)	($109)	($115)	($3,229)
Total Revenues	$94,858	$162,100	$260,724	$322,220	$319,461	$287,194	$231,806	$162,255	$93,525	$69,884	$67,422	$71,609	$2,143,060
Unit Margin ($/Mcf)	$4.1333	$3.0072	$2.6104	$2.5305	$2.5331	$2.5917	$2.7529	$3.1050	$4.4096	$6.5159	$7.0383	$6.2893	$2.9525

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Detailed Billed Revenue Workpapers (Current Rates)

Large Commercial	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	422	426	431	437	440	437	429	428	419	421	421	425	5,136
Total Volume	22,085	49,540	88,460	117,750	124,113	106,718	83,296	50,859	27,677	20,855	19,122	5,938	716,414
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01847	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01782
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.30%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$63,722	$64,326	$65,081	$65,987	$66,440	$65,987	$64,779	$64,628	$63,269	$63,571	$63,571	$64,175	$775,536
Volumetric Distribution Charge	36,709	82,345	147,039	195,723	206,301	177,387	138,455	84,538	46,005	34,664	31,785	9,870	1,190,823
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	408	882	1,574	2,095	2,209	1,899	1,482	905	493	371	340	106	12,764
Rider H - Gas Procurement Charge	2,538	5,692	10,164	13,529	14,261	12,262	9,571	5,844	3,180	2,396	2,197	682	82,316
DSIC - Distribution System Improvement Charge	3,422	5,072	7,410	11,787	12,291	10,945	10,672	7,765	5,625	5,050	4,895	3,742	88,675
Total Base Non Gas Cost Rate Revenue	$106,799	$158,317	$231,267	$289,122	$301,502	$268,481	$224,959	$163,679	$118,572	$106,053	$102,788	$78,574	$2,150,113
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44535
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03893
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20418
OPEB Surcredit ($/Mcf) - Rider I	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$9,870	$22,060	$39,391	$52,434	$55,268	$47,522	$37,092	$22,647	$12,325	$9,287	$8,515	$2,644	$319,055
Natural Gas Supply Charge ($/Mcf) - Rider A	115,119	249,354	445,256	592,680	624,713	537,157	419,264	255,993	139,311	104,969	96,251	29,887	3,609,954
Gas Adjustment Charge ($/Mcf) - Rider A	4,909	10,086	18,010	23,974	25,270	21,728	16,959	10,355	5,635	4,246	3,893	1,209	146,274
OPEB Surcredit - Rider I	(2,048)	(4,594)	(8,204)	(10,920)	(11,510)	(9,897)	(7,725)	(4,717)	(2,567)	(1,934)	(1,773)	(551)	(66,440)
Total Gas Cost Revenues	$127,850	$276,906	$494,453	$658,168	$693,741	$596,510	$465,590	$284,278	$154,704	$116,568	$106,886	$33,189	$4,008,843
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($182)	($269)	($393)	($492)	($513)	($456)	($382)	($278)	($202)	($180)	($175)	($134)	($3,656)
Total Revenues	$234,467	$434,954	$725,327	$946,798	$994,730	$864,535	$690,167	$447,679	$273,074	$222,441	$209,499	$111,629	$6,155,300
Unit Margin ($/Mcf)	$4.8358	$3.1958	$2.6144	$2.4554	$2.4292	$2.5158	$2.7007	$3.2183	$4.2841	$5.0854	$5.3753	$13.2332	$3.0012

National Fuel Gas Distribution Corporation
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Detailed Billed Revenue Workpapers (Current Rates)

Large Commercial SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	49	48	48	45	44	42	44	48	48	48	48	49	561
Total Volume	2,837	6,218	8,999	12,023	11,320	10,045	7,674	5,070	2,912	1,938	1,723	2,344	73,103
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.30%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$7,399	$7,248	$7,248	$6,795	$6,644	$6,342	$6,644	$7,248	$7,248	$7,248	$7,248	$7,399	$84,711
Volumetric Distribution Charge	4,715	10,336	14,958	19,984	18,817	16,697	12,756	8,427	4,840	3,221	2,863	3,896	121,512
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	401	582	735	1,138	1,082	979	966	781	602	523	506	565	8,860
Total Base Non Gas Cost Rate Revenue	$12,515	$18,166	$22,941	$27,917	$26,543	$24,018	$20,367	$16,456	$12,690	$10,993	$10,617	$11,860	$215,083
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44537
OPEB Surcredit ($/Mcf) - Rider I	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09276)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$1,268	$2,769	$4,007	$5,354	$5,041	$4,473	$3,417	$2,258	$1,297	$863	$767	$1,044	$32,558
OPEB Surcredit - Rider I	(263)	(577)	(835)	(1,115)	(1,050)	(932)	(712)	(470)	(270)	(180)	(160)	(217)	(6,781)
Total Gas Cost Revenues	$1,005	$2,192	$3,172	$4,239	$3,991	$3,541	$2,705	$1,788	$1,027	$683	$607	$827	$25,777
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($21)	($31)	($39)	($47)	($45)	($41)	($35)	($28)	($22)	($19)	($18)	($20)	($366)
Total Revenues	$13,499	$20,327	$26,074	$32,109	$30,489	$27,518	$23,037	$18,216	$13,695	$11,657	$11,206	$12,667	$240,494
Unit Margin ($/Mcf)	$4.4117	$2.9214	$2.5493	$2.3220	$2.3447	$2.3910	$2.6538	$3.2458	$4.3579	$5.6724	$6.1632	$5.0596	$2.9422

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Large Commercial MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	726	723	725	727	730	725	727	728	727	722	726	730	8,716
Total Volume	94,296	176,437	297,245	392,760	426,959	374,441	315,825	209,962	122,615	79,510	72,467	78,608	2,641,126
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.31%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	109,626	109,173	109,475	109,777	110,230	109,475	109,777	109,928	109,777	109,022	109,626	110,230	1,316,116
Volumetric Distribution Charge	156,739	293,273	494,080	652,846	709,692	622,397	524,964	348,999	203,810	132,162	120,455	130,662	4,390,080
DSIC - Distribution System Improvement Charge	8,817	13,321	19,978	32,411	34,847	31,105	31,610	22,855	15,617	12,059	11,504	12,045	246,167
Total Base Non Gas Cost Rate Revenue	$275,182	$415,767	$623,533	$795,035	$854,769	$762,976	$666,352	$481,782	$329,204	$253,243	$241,585	$252,937	$5,952,363
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)
Gas Cost Revenues													
MMT Gas Cost Charge	$46,205	$86,454	$145,650	$192,453	$209,210	$183,476	$154,754	$102,881	$60,081	$38,960	$35,509	$38,518	$1,294,151
OPEB Surcredit - Rider I	(11,161)	(20,883)	(35,182)	(46,487)	(50,535)	(44,319)	(37,381)	(24,851)	(14,513)	(9,411)	(8,577)	(9,304)	(312,604)
Total Gas Cost Revenues	$35,044	$65,571	$110,468	$145,966	$158,675	$139,157	$117,373	$78,030	$45,568	$29,549	$26,932	$29,214	$981,547
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($468)	($707)	($1,060)	($1,352)	($1,453)	($1,297)	($1,133)	($819)	($560)	($431)	($411)	($430)	($10,121)
Total Revenues	$309,758	$480,631	$732,941	$939,649	$1,011,991	$900,836	$782,592	$558,993	$374,212	$282,361	$268,106	$281,721	$6,923,789
Unit Margin ($/Mcf)	$2.9183	$2.3565	$2.0977	$2.0242	$2.0020	$2.0376	$2.1099	$2.2946	$2.6849	$3.1850	$3.3337	$3.2177	$2.2537

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Large Commercial DMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	11	11	11	11	11	11	11	11	11	11	11	11	132
Total Volume	50,901	65,881	67,309	73,313	81,879	73,457	66,268	54,419	47,325	43,823	43,997	48,110	716,683
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.32%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	19,932
Volumetric Distribution Charge	84,607	109,507	111,881	121,862	136,099	122,099	110,151	90,456	78,664	72,843	73,132	79,969	1,191,270
DSIC - Distribution System Improvement Charge	2,855	3,680	3,758	5,250	5,855	5,260	5,568	4,587	4,000	3,725	3,740	4,081	52,360
Total Base Non Gas Cost Rate Revenue	$89,124	$114,848	$117,300	$128,772	$143,615	$129,020	$117,381	$96,704	$84,325	$78,229	$78,532	$85,711	$1,263,562
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)
Gas Cost Revenues													
OPEB Surcredit - Rider I	(6,025)	(7,798)	(7,967)	(8,677)	(9,691)	(8,694)	(7,844)	(6,441)	(5,601)	(5,187)	(5,207)	(5,694)	(84,826)
Total Gas Cost Revenues	($6,025)	($7,798)	($7,967)	($8,677)	($9,691)	($8,694)	($7,844)	($6,441)	($5,601)	($5,187)	($5,207)	($5,694)	($84,826)
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($152)	($195)	($199)	($219)	($244)	($219)	($200)	($164)	($143)	($133)	($134)	($146)	($2,148)
Total Revenues	$82,947	$106,855	$109,134	$119,876	$133,680	$120,107	$109,337	$90,099	$78,581	$72,909	$73,191	$79,871	$1,176,588
Unit Margin ($/Mcf)	$1.7509	$1.7433	$1.7427	$1.7565	$1.7540	$1.7564	$1.7713	$1.7770	$1.7818	$1.7851	$1.7850	$1.7816	$1.7631

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Natural Gas Vehicles	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	7	7	7	7	7	7	7	7	7	7	7	7	84
Total Volume	2,634	5,491	11,306	14,368	13,825	12,157	9,879	5,945	1,978	860	599	761	79,802
Base Non Gas Cost Rate:													
Volumetric Distribution Charge	$1.96470	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.79538
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.20%
Base Non Gas Cost Rate Revenue:													
Volumetric Distribution Charge	5,175	9,827	20,232	25,712	24,742	21,756	17,679	10,639	3,539	1,539	1,072	1,361	143,274
DSIC - Distribution System Improvement Charge	171	325	670	1,093	1,052	925	880	530	176	77	54	68	6,020
Total Base Non Gas Cost Rate Revenue	$5,347	$10,152	$20,902	$26,805	$25,793	$22,681	$18,560	$11,169	$3,715	$1,615	$1,125	$1,429	$149,295
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44535
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03929
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20422
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$1,177	$2,445	$5,034	$6,398	$6,156	$5,414	$4,399	$2,647	$881	$383	$267	$339	$35,540
Natural Gas Supply Charge ($/Mcf) - Rider A	13,731	27,639	56,905	72,318	69,589	61,191	49,724	29,924	9,954	4,327	3,014	3,828	402,144
Gas Adjustment Charge ($/Mcf) - Rider A	586	1,118	2,302	2,925	2,815	2,475	2,011	1,210	403	175	122	155	16,297
Total Gas Cost Revenues	$15,494	$31,202	$64,241	$81,641	$78,560	$69,080	$56,134	$33,781	$11,238	$4,885	$3,403	$4,322	$453,981
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($9)	($17)	($36)	($46)	($44)	($39)	($32)	($19)	($6)	($3)	($2)	($2)	($255)
Total Revenues	$20,832	$41,337	$85,107	$108,400	$104,309	$91,722	$74,662	$44,931	$14,947	$6,497	$4,526	$5,749	$603,021
Unit Margin ($/Mcf)	$2.0297	$1.8488	$1.8488	$1.8657	$1.8657	$1.8657	$1.8787	$1.8787	$1.8787	$1.8791	$1.8791	$1.8791	$1.8708

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Small Public Authority < 250 Sales	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	379	380	397	394	378	379	379	377	375	375	370	366	4,549
Total Volume	12,926	11,616	9,485	11,059	8,591	9,079	9,132	9,029	8,660	9,205	8,217	25,040	132,038
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01847	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01786
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.39%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$10,233	$10,260	$10,719	$10,638	$10,206	$10,233	$10,233	$10,179	$10,125	$10,125	$9,990	$9,882	$122,823
Volumetric Distribution Charge	29,723	26,709	21,809	25,429	19,754	20,876	20,997	20,760	19,913	21,166	18,894	57,578	303,608
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	239	207	169	197	153	162	163	161	154	164	146	446	2,358
Rider H - Gas Procurement Charge	1,485	1,335	1,090	1,271	987	1,043	1,049	1,037	995	1,058	944	2,877	15,171
DSIC - Distribution System Improvement Charge	1,380	1,275	1,118	1,595	1,322	1,373	1,616	1,600	1,553	1,626	1,499	3,539	19,496
Total Base Non Gas Cost Rate Revenue	$43,060	$39,785	$34,905	$39,130	$32,421	$33,687	$34,058	$33,738	$32,740	$34,138	$31,473	$74,321	$463,456
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44546
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.05094
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20543
OPEB Surcredit ($/Mcf) - Rider I	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10551)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$5,777	$5,172	$4,224	$4,925	$3,826	$4,043	$4,066	$4,020	$3,856	$4,099	$3,659	$11,150	$58,817
Natural Gas Supply Charge ($/Mcf) - Rider A	67,380	58,466	47,740	55,665	43,241	45,697	45,963	45,445	43,590	46,332	41,358	126,038	666,915
Gas Adjustment Charge ($/Mcf) - Rider A	2,874	2,365	1,931	2,252	1,749	1,848	1,859	1,838	1,763	1,874	1,673	5,098	27,124
OPEB Surcredit - Rider I	(1,364)	(1,225)	(1,001)	(1,167)	(906)	(958)	(963)	(953)	(914)	(971)	(867)	(2,642)	(13,931)
Total Gas Cost Revenues	$74,667	$64,778	$52,894	$61,675	$47,910	$50,630	$50,925	$50,350	$48,295	$51,334	$45,823	$139,644	$738,925
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($73)	($68)	($59)	($67)	($55)	($57)	($58)	($57)	($56)	($58)	($54)	($126)	($788)
Total Revenues	$117,654	$104,495	$87,740	$100,738	$80,276	$84,260	$84,925	$84,031	$80,979	$85,414	$77,242	$213,839	$1,201,593
Unit Margin ($/Mcf)	$3.3311	$3.4251	$3.6801	$3.5383	$3.7740	$3.7105	$3.7296	$3.7368	$3.7806	$3.7086	$3.8303	$2.9681	$3.5100

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Small Public Authority < 250 SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	23	23	23	23	23	23	23	23	23	23	23	23	276
Total Volume	55	156	337	472	473	407	291	135	66	76	18	37	2,523
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.32%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$621	$621	$621	$621	$621	$621	$621	$621	$621	$621	$621	$621	$7,452
Volumetric Distribution Charge	125	358	774	1,086	1,087	937	669	309	153	176	40	86	5,801
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	25	32	46	73	73	66	64	46	39	40	33	35	572
Total Base Non Gas Cost Rate Revenue	$771	$1,011	$1,441	$1,780	$1,780	$1,624	$1,355	$977	$812	$836	$694	$742	$13,825
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44515
OPEB Surcredit ($/Mcf) - Rider I	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10584)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$24	$69	$150	$210	$210	$181	$130	$60	$30	$34	$8	$17	$1,123
OPEB Surcredit - Rider I	(6)	(16)	(36)	(50)	(50)	(43)	(31)	(14)	(7)	(8)	(2)	(4)	(267)
Total Gas Cost Revenues	$18	$53	$114	$160	$160	$138	$99	$46	$23	$26	$6	$13	$856
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.16%
Rider B - State Tax Adjustment	($1)	($2)	($2)	($3)	($3)	($3)	($2)	($2)	($1)	($1)	($1)	($1)	($22)
Total Revenues	$788	$1,062	$1,553	$1,937	$1,937	$1,759	$1,452	$1,021	$834	$861	$699	$754	$14,659
Unit Margin ($/Mcf)	$14.1444	$6.4969	$4.2807	$3.7675	$3.7672	$3.9858	$4.6535	$7.2605	$12.2217	$10.9495	$39.5527	$19.8590	$5.4800

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

Small Public Authority < 250 MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	194	194	190	192	208	205	205	206	210	209	214	217	2,444
Total Volume	798	1,789	3,921	5,628	6,182	5,366	3,627	1,870	842	401	300	476	31,199
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.32%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	5,238	5,238	5,130	5,184	5,616	5,535	5,535	5,562	5,670	5,643	5,778	5,859	65,988
Volumetric Distribution Charge	1,835	4,115	9,016	12,940	14,214	12,338	8,340	4,300	1,937	921	689	1,095	71,739
DSIC - Distribution System Improvement Charge	234	310	468	770	843	760	691	491	379	328	323	348	5,945
Total Base Non Gas Cost Rate Revenue	$7,307	$9,662	$14,614	$18,894	$20,673	$18,632	$14,566	$10,354	$7,985	$6,892	$6,790	$7,301	$143,671
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.48995
OPEB Surcredit ($/Mcf) - Rider I	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07782)
Gas Cost Revenues													
MMT Gas Cost Charge	$391	$877	$1,921	$2,757	$3,029	$2,629	$1,777	$916	$413	$196	$147	$233	$15,286
OPEB Surcredit - Rider I	(62)	(139)	(305)	(438)	(481)	(418)	(282)	(146)	(66)	(31)	(23)	(37)	(2,428)
Total Gas Cost Revenues	$329	$738	$1,616	$2,319	$2,548	$2,211	$1,495	$770	$347	$165	$124	$196	$12,858
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($12)	($16)	($25)	($32)	($35)	($32)	($25)	($18)	($14)	($12)	($12)	($12)	($245)
Total Revenues	$7,624	$10,384	$16,205	$21,181	$23,186	$20,811	$16,036	$11,106	$8,318	$7,045	$6,902	$7,485	$156,284
Unit Margin ($/Mcf)	$9.1582	$5.3996	$3.7272	$3.3575	$3.3442	$3.4725	$4.0159	$5.5360	$9.4817	$17.2042	$22.6664	$15.3353	$4.6050

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

Small Public Authority > 250 Sales	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	121	121	127	124	115	113	114	117	112	117	109	105	1,395
Total Volume	854	2,435	5,394	7,855	7,607	6,493	4,476	1,983	751	518	272	510	39,148
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01847	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01781
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.26%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$4,477	$4,477	$4,699	$4,588	$4,255	$4,181	$4,218	$4,329	$4,144	$4,329	$4,033	$3,885	$51,615
Volumetric Distribution Charge	1,756	5,004	11,088	16,146	15,635	13,347	9,201	4,076	1,543	1,064	560	1,048	80,469
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	16	43	96	140	135	116	80	35	13	9	5	9	697
Rider H - Gas Procurement Charge	98	280	620	903	874	746	514	228	86	60	31	59	4,498
DSIC - Distribution System Improvement Charge	210	325	546	925	888	782	698	432	288	273	231	250	5,848
Total Base Non Gas Cost Rate Revenue	$6,557	$10,129	$17,049	$22,701	$21,788	$19,171	$14,710	$9,100	$6,075	$5,735	$4,860	$5,250	$143,128
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44534
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03731
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20400
OPEB Surcredit ($/Mcf) - Rider I	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11761)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$382	$1,084	$2,402	$3,498	$3,387	$2,892	$1,993	$883	$334	$231	$121	$227	$17,434
Natural Gas Supply Charge ($/Mcf) - Rider A	4,454	12,254	27,152	39,536	38,287	32,684	22,530	9,982	3,779	2,606	1,371	2,566	197,201
Gas Adjustment Charge ($/Mcf) - Rider A	190	496	1,098	1,599	1,549	1,322	911	404	153	105	55	104	7,986
OPEB Surcredit - Rider I	(101)	(286)	(634)	(924)	(895)	(764)	(526)	(233)	(88)	(61)	(32)	(60)	(4,604)
Total Gas Cost Revenues	$4,925	$13,548	$30,018	$43,709	$42,328	$36,134	$24,908	$11,036	$4,178	$2,881	$1,515	$2,837	$218,017
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($11)	($17)	($29)	($39)	($37)	($33)	($25)	($15)	($10)	($10)	($8)	($9)	($243)
Total Revenues	$11,471	$23,660	$47,038	$66,371	$64,079	$55,272	$39,593	$20,121	$10,243	$8,606	$6,367	$8,078	$360,902
Unit Margin ($/Mcf)	$7.6743	$4.1604	$3.1605	$2.8901	$2.8644	$2.9524	$3.2864	$4.5888	$8.0919	$11.0758	$17.8479	$10.3006	$3.6561

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Small Public Authority > 250 SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	19	19	19	19	19	19	19	19	19	19	19	19	228
Total Volume	213	652	1,384	1,959	1,948	1,696	1,172	520	244	218	44	70	10,118
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.26%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$703	$703	$703	$703	$703	$703	$703	$703	$703	$703	$703	$703	$8,436
Volumetric Distribution Charge	438	1,340	2,844	4,027	4,003	3,487	2,408	1,068	501	449	91	143	20,798
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	38	68	117	201	200	178	155	88	60	58	40	42	1,245
Total Base Non Gas Cost Rate Revenue	$1,178	$2,110	$3,664	$4,931	$4,906	$4,368	$3,266	$1,859	$1,264	$1,209	$833	$888	$30,478
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44514
OPEB Surcredit ($/Mcf) - Rider I	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11771)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$95	$290	$616	$872	$867	$755	$522	$231	$108	$97	$20	$31	$4,504
OPEB Surcredit - Rider I	(25)	(77)	(163)	(230)	(229)	(200)	(138)	(61)	(29)	(26)	(5)	(8)	(1,191)
Total Gas Cost Revenues	$70	$213	$453	$642	$638	$555	$384	$170	$79	$71	$15	$23	$3,313
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($2)	($4)	($6)	($8)	($8)	($7)	($6)	($3)	($2)	($2)	($1)	($2)	($52)
Total Revenues	$1,246	$2,320	$4,111	$5,565	$5,536	$4,916	$3,644	$2,026	$1,340	$1,278	$847	$910	$33,739
Unit Margin ($/Mcf)	$5.5355	$3.2379	$2.6485	$2.5169	$2.5192	$2.5749	$2.7878	$3.5779	$5.1879	$5.5405	$18.9148	$12.7784	$3.0123

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Small Public Authority > 250 MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	205	207	199	202	212	215	213	212	218	211	218	221	2,533
Total Volume	3,054	8,334	15,338	19,989	20,856	18,274	13,499	8,054	2,879	925	726	1,067	112,995
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00000	$37.00000	$37.00000	$37.00000	$37.00000	$37.00000	$37.00000	$37.00000	$37.00000	$37.00000	$37.00000	$37.00000	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.26%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	7,585	7,659	7,363	7,474	7,844	7,955	7,881	7,844	8,066	7,807	8,066	8,177	93,721
Volumetric Distribution Charge	6,278	17,131	31,528	41,087	42,870	37,563	27,746	16,555	5,917	1,901	1,492	2,194	232,262
DSIC - Distribution System Improvement Charge	459	821	1,287	2,064	2,155	1,935	1,774	1,215	696	485	478	519	13,888
Total Base Non Gas Cost Rate Revenue	$14,321	$25,611	$40,178	$50,625	$52,870	$47,453	$37,402	$25,614	$14,680	$10,193	$10,036	$10,889	$339,870
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)
Gas Cost Revenues													
MMT Gas Cost Charge	$1,496	$4,084	$7,516	$9,795	$10,220	$8,954	$6,614	$3,946	$1,411	$453	$356	$523	$55,368
OPEB Surcredit - Rider I	(326)	(890)	(1,639)	(2,135)	(2,228)	(1,952)	(1,442)	(860)	(308)	(99)	(78)	(114)	(12,071)
Total Gas Cost Revenues	$1,170	$3,194	$5,877	$7,660	$7,992	$7,002	$5,172	$3,086	$1,103	$354	$278	$409	$43,297
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($24)	($44)	($68)	($86)	($90)	($81)	($64)	($44)	($25)	($17)	($17)	($19)	($579)
Total Revenues	$15,467	$28,761	$45,987	$58,199	$60,772	$54,374	$42,510	$28,656	$15,758	$10,530	$10,297	$11,279	$382,588
Unit Margin ($/Mcf)	$4.6894	$3.0729	$2.6195	$2.5327	$2.5349	$2.5967	$2.7708	$3.1803	$5.0993	$11.0232	$13.8284	$10.2034	$3.0078

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

Large Public Authority Sales	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	36	35	35	34	33	34	34	34	32	39	35	32	413
Total Volume	1,392	4,288	8,922	11,283	10,387	8,768	6,519	3,887	1,093	178	63	211	56,990
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01847	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01781
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.24%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$5,436	$5,285	$5,285	$5,134	$4,983	$5,134	$5,134	$5,134	$4,832	$5,889	$5,285	$4,832	$62,363
Volumetric Distribution Charge	2,314	7,127	14,830	18,754	17,265	14,574	10,836	6,460	1,816	297	106	350	94,728
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	26	76	159	201	185	156	116	69	19	3	1	4	1,015
Rider H - Gas Procurement Charge	160	493	1,025	1,296	1,193	1,007	749	447	126	21	7	24	6,548
DSIC - Distribution System Improvement Charge	263	430	705	1,079	1,004	887	838	603	338	310	270	261	6,988
Total Base Non Gas Cost Rate Revenue	$8,198	$13,411	$22,004	$26,464	$24,631	$21,758	$17,674	$12,713	$7,132	$6,520	$5,669	$5,471	$171,643
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44533
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03776
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20402
OPEB Surcredit ($/Mcf) - Rider I	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$622	$1,909	$3,973	$5,024	$4,625	$3,904	$2,903	$1,731	$487	$79	$28	$94	$25,379
Natural Gas Supply Charge ($/Mcf) - Rider A	7,255	21,582	44,907	56,789	52,282	44,131	32,814	19,562	5,500	898	320	1,061	287,101
Gas Adjustment Charge ($/Mcf) - Rider A	309	873	1,816	2,297	2,115	1,785	1,327	791	222	36	13	43	11,627
OPEB Surcredit - Rider I	(129)	(398)	(827)	(1,046)	(963)	(813)	(605)	(360)	(101)	(17)	(6)	(20)	(5,285)
Total Gas Cost Revenues	$8,057	$23,966	$49,869	$63,064	$58,059	$49,007	$36,439	$21,724	$6,108	$996	$355	$1,178	$318,822
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($14)	($23)	($37)	($45)	($42)	($37)	($30)	($22)	($12)	($11)	($10)	($9)	($292)
Total Revenues	$16,241	$37,354	$71,836	$89,483	$82,648	$70,728	$54,083	$34,415	$13,228	$7,505	$6,014	$6,640	$490,173
Unit Margin ($/Mcf)	$5.8898	$3.1277	$2.4663	$2.3456	$2.3713	$2.4816	$2.7110	$3.2710	$6.5268	$36.5371	$89.2813	$25.9489	$3.0118

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Large Public Authority SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	3	3	3	3	3	3	3	3	3	3	3	3	36
Total Volume	198	206	418	627	711	587	488	242	129	86	45	52	3,788
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.31%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$453	$453	$453	$453	$453	$453	$453	$453	$453	$453	$453	$453	$5,436
Volumetric Distribution Charge	330	343	695	1,042	1,181	976	810	403	215	142	74	86	6,297
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	26	26	38	64	69	61	63	43	33	30	26	27	506
Total Base Non Gas Cost Rate Revenue	$809	$822	$1,187	$1,558	$1,703	$1,489	$1,326	$898	$701	$625	$554	$566	$12,238
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44507
OPEB Surcredit ($/Mcf) - Rider I	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09239)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$89	$92	$186	$279	$316	$261	$217	$108	$57	$38	$20	$23	$1,686
OPEB Surcredit - Rider I	(18)	(19)	(39)	(58)	(66)	(54)	(45)	(22)	(12)	(8)	(4)	(5)	(350)
Total Gas Cost Revenues	$71	$73	$147	$221	$250	$207	$172	$86	$45	$30	$16	$18	$1,336
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($1)	($1)	($2)	($3)	($3)	($3)	($2)	($2)	($1)	($1)	($1)	($1)	($21)
Total Revenues	$879	$894	$1,332	$1,776	$1,950	$1,693	$1,496	$982	$745	$654	$569	$583	$13,553
Unit Margin ($/Mcf)	$4.0769	$3.9854	$2.8357	$2.4863	$2.3975	$2.5374	$2.7203	$3.7088	$5.4291	$7.3031	$12.3941	$10.9366	$3.2307

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Large Public Authority MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	284	283	283	284	285	283	283	285	285	277	282	284	3,398
Total Volume	50,694	114,343	202,234	273,365	312,564	276,886	246,649	163,601	88,695	44,486	37,860	38,829	1,850,205
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.32%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	42,884	42,733	42,733	42,884	43,035	42,733	42,733	43,035	43,035	41,827	42,582	42,884	513,098
Volumetric Distribution Charge	84,264	190,061	336,154	454,387	519,544	460,239	409,979	271,937	147,428	73,945	62,931	64,541	3,075,410
DSIC - Distribution System Improvement Charge	4,209	7,705	12,541	21,134	23,910	21,376	22,545	15,686	9,485	5,789	5,276	5,371	155,026
Total Base Non Gas Cost Rate Revenue	$131,357	$240,499	$391,428	$518,405	$586,488	$524,349	$475,257	$330,657	$199,948	$121,561	$110,789	$112,796	$3,743,535
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)
Gas Cost Revenues													
MMT Gas Cost Charge	$24,840	$56,028	$99,095	$133,949	$153,156	$135,674	$120,858	$80,164	$43,460	$21,798	$18,551	$19,026	$906,599
OPEB Surcredit - Rider I	(6,000)	(13,534)	(23,936)	(32,355)	(36,995)	(32,772)	(29,193)	(19,364)	(10,498)	(5,265)	(4,481)	(4,596)	(218,989)
Total Gas Cost Revenues	$18,840	$42,494	$75,159	$101,594	$116,161	$102,902	$91,665	$60,800	$32,962	$16,533	$14,070	$14,430	$687,610
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($223)	($409)	($665)	($881)	($997)	($891)	($808)	($562)	($340)	($207)	($188)	($192)	($6,363)
Total Revenues	$149,974	$282,584	$465,922	$619,118	$701,652	$626,360	$566,114	$390,895	$232,570	$137,887	$124,671	$127,034	$4,424,782
Unit Margin ($/Mcf)	$2.5912	$2.1033	$1.9355	$1.8964	$1.8764	$1.8937	$1.9269	$2.0211	$2.2543	$2.7325	$2.9263	$2.9050	$2.0233

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Large Public Authority DMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	3	3	3	3	3	3	3	3	3	3	3	3	36
Total Volume	10,699	20,147	22,056	26,360	25,242	27,343	19,326	14,449	3,770	7,255	15,421	11,095	203,162
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.27%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	453	453	453	453	453	453	453	453	453	453	453	453	5,436
Volumetric Distribution Charge	17,784	33,488	36,661	43,816	41,957	45,449	32,123	24,017	6,266	12,060	25,633	18,442	337,695
DSIC - Distribution System Improvement Charge	604	1,123	1,228	1,881	1,802	1,951	1,622	1,219	335	626	1,304	945	14,640
Total Base Non Gas Cost Rate Revenue	$18,841	$35,065	$38,343	$46,150	$44,212	$47,853	$34,198	$25,689	$7,054	$13,138	$27,390	$19,840	$357,772
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)
Gas Cost Revenues													
OPEB Surcredit - Rider I	(1,266)	(2,385)	(2,611)	(3,120)	(2,988)	(3,236)	(2,287)	(1,710)	(446)	(859)	(1,825)	(1,313)	(24,046)
Total Gas Cost Revenues	($1,266)	($2,385)	($2,611)	($3,120)	($2,988)	($3,236)	($2,287)	($1,710)	($446)	($859)	($1,825)	($1,313)	($24,046)
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($32)	($60)	($65)	($78)	($75)	($81)	($58)	($44)	($12)	($22)	($47)	($34)	($608)
Total Revenues	$17,543	$32,620	$35,667	$42,952	$41,149	$44,536	$31,853	$23,935	$6,596	$12,257	$25,518	$18,493	$333,118
Unit Margin ($/Mcf)	$1.7610	$1.7404	$1.7384	$1.7508	$1.7516	$1.7501	$1.7696	$1.7779	$1.8711	$1.8109	$1.7762	$1.7882	$1.7610

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SVIS Sales	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	120	123	126	125	126	128	129	127	125	123	122	122	1,496
Total Volume	735	2,866	8,208	11,482	12,895	9,839	6,873	3,388	1,274	620	295	586	59,062
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01847	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.30%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$9,840	$10,086	$10,332	$10,250	$10,332	$10,496	$10,578	$10,414	$10,250	$10,086	$10,004	$10,004	$122,672
Volumetric Distribution Charge	1,522	5,939	17,008	23,792	26,721	20,389	14,243	7,021	2,640	1,285	612	1,214	122,389
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	14	51	146	204	229	175	122	60	23	11	5	10	1,052
Rider H - Gas Procurement Charge	84	329	943	1,319	1,482	1,131	790	389	146	71	34	67	6,786
DSIC - Distribution System Improvement Charge	379	543	941	1,512	1,647	1,368	1,282	891	650	573	533	565	10,883
Total Base Non Gas Cost Rate Revenue	$11,840	$16,949	$29,370	$37,078	$40,412	$33,559	$27,015	$18,776	$13,710	$12,026	$11,188	$11,861	$263,782
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44531
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03563
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20380
OPEB Surcredit ($/Mcf) - Rider I	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06197)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$328	$1,276	$3,655	$5,113	$5,742	$4,382	$3,061	$1,509	$567	$276	$131	$261	$26,301
Natural Gas Supply Charge ($/Mcf) - Rider A	3,829	14,427	41,313	57,792	64,906	49,526	34,597	17,055	6,414	3,121	1,486	2,950	297,416
Gas Adjustment Charge ($/Mcf) - Rider A	163	584	1,671	2,338	2,625	2,003	1,399	690	259	126	60	119	12,037
OPEB Surcredit - Rider I	(46)	(178)	(509)	(711)	(799)	(610)	(426)	(210)	(79)	(38)	(18)	(36)	(3,660)
Total Gas Cost Revenues	$4,274	$16,109	$46,130	$64,532	$72,474	$55,301	$38,631	$19,044	$7,161	$3,485	$1,659	$3,294	$332,094
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($20)	($29)	($50)	($63)	($69)	($57)	($46)	($32)	($23)	($20)	($19)	($20)	($448)
Total Revenues	$16,094	$33,029	$75,450	$101,547	$112,817	$88,803	$65,600	$37,788	$20,848	$15,491	$12,828	$15,135	$595,428
Unit Margin ($/Mcf)	$16.1165	$5.9133	$3.5784	$3.2293	$3.1339	$3.4107	$3.9303	$5.5413	$10.7593	$19.3934	$37.8918	$20.2386	$4.4662

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SVIS SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	11	11	11	11	11	11	11	11	11	11	11	11	132
Total Volume	44	226	652	992	1,117	846	595	248	109	26	16	31	4,900
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.31%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$902	$902	$902	$902	$902	$902	$902	$902	$902	$902	$902	$902	$10,824
Volumetric Distribution Charge	91	468	1,351	2,055	2,314	1,753	1,233	514	225	55	32	64	10,155
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	33	45	75	126	137	113	106	71	56	48	47	48	904
Total Base Non Gas Cost Rate Revenue	$1,026	$1,415	$2,327	$3,083	$3,353	$2,768	$2,242	$1,487	$1,183	$1,004	$981	$1,015	$21,882
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44547
OPEB Surcredit ($/Mcf) - Rider I	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06183)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$20	$100	$290	$442	$497	$377	$265	$111	$48	$12	$7	$14	$2,183
OPEB Surcredit - Rider I	(3)	(14)	(40)	(61)	(69)	(52)	(37)	(15)	(7)	(2)	(1)	(2)	(303)
Total Gas Cost Revenues	$17	$86	$250	$381	$428	$325	$228	$96	$41	$10	$6	$12	$1,880
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.18%
Rider B - State Tax Adjustment	($2)	($2)	($4)	($5)	($6)	($5)	($4)	($3)	($2)	($2)	($2)	($2)	($39)
Total Revenues	$1,041	$1,499	$2,573	$3,459	$3,775	$3,088	$2,466	$1,580	$1,222	$1,012	$985	$1,025	$23,723
Unit Margin ($/Mcf)	$23.4398	$6.2712	$3.5704	$3.1084	$3.0023	$3.2720	$3.7664	$5.9904	$10.8933	$38.1013	$63.0831	$32.7118	$4.4654

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SVIS MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	60	61	66	66	65	63	59	59	63	61	62	62	747
Total Volume	614	2,230	5,435	7,850	8,423	6,279	3,978	1,917	696	314	267	322	38,326
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.27%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	4,920	5,002	5,412	5,412	5,330	5,166	4,838	4,838	5,166	5,002	5,084	5,084	61,254
Volumetric Distribution Charge	1,273	4,622	11,263	16,267	17,455	13,011	8,244	3,972	1,442	650	554	667	79,419
DSIC - Distribution System Improvement Charge	205	319	552	921	968	773	651	439	329	283	282	288	6,009
Total Base Non Gas Cost Rate Revenue	$6,398	$9,942	$17,227	$22,600	$23,753	$18,949	$13,734	$9,249	$6,937	$5,935	$5,920	$6,038	$146,682
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.48998
OPEB Surcredit ($/Mcf) - Rider I	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02119)
Gas Cost Revenues													
MMT Gas Cost Charge	$301	$1,093	$2,663	$3,846	$4,127	$3,077	$1,949	$939	$341	$154	$131	$158	$18,779
OPEB Surcredit - Rider I	(13)	(47)	(115)	(166)	(178)	(133)	(84)	(41)	(15)	(7)	(6)	(7)	(812)
Total Gas Cost Revenues	$288	$1,046	$2,548	$3,680	$3,949	$2,944	$1,865	$898	$326	$147	$125	$151	$17,967
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($11)	($17)	($29)	($38)	($40)	($32)	($23)	($16)	($12)	($10)	($10)	($10)	($248)
Total Revenues	$6,675	$10,971	$19,746	$26,242	$27,662	$21,861	$15,576	$10,131	$7,251	$6,072	$6,035	$6,179	$164,401
Unit Margin ($/Mcf)	$10.4146	$4.4577	$3.1694	$2.8790	$2.8199	$3.0180	$3.4520	$4.8250	$9.9688	$18.9191	$22.1538	$18.7702	$3.8272

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IVIS Sales	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	62	58	55	56	56	54	54	55	52	60	57	57	676
Total Volume	6,497	10,694	20,328	27,199	29,840	25,648	19,686	12,675	6,334	5,468	3,372	3,612	171,352
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01847	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01780	$0.01782
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.31%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$15,624	$14,616	$13,860	$14,112	$14,112	$13,608	$13,608	$13,860	$13,104	$15,120	$14,364	$14,364	$170,352
Volumetric Distribution Charge	8,671	14,274	27,132	36,302	39,827	34,232	26,275	16,917	8,454	7,298	4,500	4,821	228,704
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	120	190	362	484	531	456	350	226	113	97	60	64	3,054
Rider H - Gas Procurement Charge	746	1,229	2,336	3,125	3,429	2,947	2,262	1,456	728	628	387	415	19,688
DSIC - Distribution System Improvement Charge	833	1,003	1,446	2,296	2,461	2,178	2,116	1,616	1,115	1,157	966	983	18,171
Total Base Non Gas Cost Rate Revenue	$25,994	$31,312	$45,135	$56,319	$60,360	$53,422	$44,612	$34,076	$23,514	$24,300	$20,277	$20,648	$439,969
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44536
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.04019
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20430
OPEB Surcredit ($/Mcf) - Rider I	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13410)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$2,903	$4,762	$9,052	$12,112	$13,288	$11,421	$8,766	$5,644	$2,821	$2,435	$1,501	$1,608	$76,313
Natural Gas Supply Charge ($/Mcf) - Rider A	33,864	53,828	102,319	136,902	150,197	129,096	99,088	63,799	31,882	27,521	16,971	18,181	863,648
Gas Adjustment Charge ($/Mcf) - Rider A	1,444	2,177	4,139	5,538	6,075	5,222	4,008	2,581	1,290	1,113	686	735	35,008
OPEB Surcredit - Rider I	(871)	(1,434)	(2,726)	(3,648)	(4,002)	(3,440)	(2,640)	(1,700)	(849)	(733)	(452)	(484)	(22,979)
Total Gas Cost Revenues	$37,340	$59,333	$112,784	$150,904	$165,558	$142,299	$109,222	$70,324	$35,144	$30,336	$18,706	$20,040	$951,990
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($44)	($53)	($77)	($96)	($103)	($91)	($76)	($58)	($40)	($41)	($34)	($35)	($748)
Total Revenues	$63,290	$90,592	$157,842	$207,127	$225,815	$195,630	$153,758	$104,342	$58,618	$54,595	$38,949	$40,653	$1,391,211
Unit Margin ($/Mcf)	$4.0012	$2.9279	$2.2203	$2.0707	$2.0228	$2.0829	$2.2661	$2.6884	$3.7123	$4.4444	$6.0138	$5.7162	$2.5676

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IVIS SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	3	3	3	3	3	3	3	3	3	3	3	3	36
Total Volume	185	342	795	947	1,008	832	696	387	158	99	98	109	5,658
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.32%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$756	$756	$756	$756	$756	$756	$756	$756	$756	$756	$756	$756	$9,072
Volumetric Distribution Charge	247	457	1,061	1,264	1,345	1,111	930	516	211	132	131	146	7,551
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	33	40	60	86	89	79	84	63	48	44	44	45	717
Total Base Non Gas Cost Rate Revenue	$1,036	$1,253	$1,877	$2,106	$2,191	$1,946	$1,770	$1,336	$1,016	$932	$932	$947	$17,341
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44558
OPEB Surcredit ($/Mcf) - Rider I	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13415)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$83	$152	$354	$422	$449	$371	$310	$172	$71	$44	$44	$49	$2,521
OPEB Surcredit - Rider I	(25)	(46)	(107)	(127)	(135)	(112)	(93)	(52)	(21)	(13)	(13)	(15)	(759)
Total Gas Cost Revenues	$58	$106	$247	$295	$314	$259	$217	$120	$50	$31	$31	$34	$1,762
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.18%
Rider B - State Tax Adjustment	($2)	($2)	($3)	($4)	($4)	($3)	($3)	($2)	($2)	($2)	($2)	($2)	($31)
Total Revenues	$1,092	$1,357	$2,121	$2,397	$2,501	$2,202	$1,984	$1,454	$1,064	$961	$961	$979	$19,072
Unit Margin ($/Mcf)	$5.5982	$3.6621	$2.3613	$2.2235	$2.1733	$2.3385	$2.5407	$3.4528	$6.4098	$9.4425	$9.4660	$8.6661	$3.0649

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IVIS MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	269	268	271	271	271	274	274	275	274	267	268	268	3,250
Total Volume	153,212	192,380	234,551	270,037	308,686	283,815	257,928	187,855	164,166	149,605	147,557	150,562	2,500,356
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.35%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	67,788	67,536	68,292	68,292	68,292	69,048	69,048	69,300	69,048	67,284	67,536	67,536	819,000
Volumetric Distribution Charge	204,492	256,769	313,056	360,419	412,004	378,808	344,257	250,731	219,112	199,678	196,945	200,956	3,337,225
DSIC - Distribution System Improvement Charge	9,012	10,734	12,623	18,220	20,413	19,034	20,583	15,938	14,350	13,348	13,224	13,425	180,903
Total Base Non Gas Cost Rate Revenue	$281,293	$335,039	$393,970	$446,931	$500,708	$466,890	$433,888	$335,968	$302,510	$280,310	$277,705	$281,916	$4,337,129
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)
Gas Cost Revenues													
MMT Gas Cost Charge	$75,074	$94,266	$114,930	$132,318	$151,256	$139,069	$126,385	$92,049	$80,441	$73,307	$72,303	$73,776	$1,225,174
OPEB Surcredit - Rider I	(9,300)	(11,677)	(14,237)	(16,391)	(18,737)	(17,228)	(15,656)	(11,403)	(9,965)	(9,081)	(8,957)	(9,139)	(151,771)
Total Gas Cost Revenues	$65,774	$82,589	$100,693	$115,927	$132,519	$121,841	$110,729	$80,646	$70,476	$64,226	$63,346	$64,637	$1,073,403
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($478)	($570)	($670)	($760)	($851)	($794)	($738)	($571)	($514)	($477)	($472)	($479)	($7,374)
Total Revenues	$346,589	$417,058	$493,993	$562,098	$632,376	$587,937	$543,879	$416,043	$372,472	$344,059	$340,579	$346,074	$5,403,158
Unit Margin ($/Mcf)	$1.8360	$1.7416	$1.6797	$1.6551	$1.6221	$1.6450	$1.6822	$1.7884	$1.8427	$1.8737	$1.8820	$1.8724	$1.7346

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IVIS DMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	24	24	24	24	24	24	24	24	24	24	24	24	288
Total Volume	42,439	54,108	62,056	71,279	87,132	78,033	75,170	60,981	51,344	44,999	40,448	43,225	711,214
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.37%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	72,576
Volumetric Distribution Charge	56,643	72,218	82,826	95,136	116,295	104,151	100,330	81,391	68,528	60,060	53,986	57,692	949,257
DSIC - Distribution System Improvement Charge	2,075	2,591	2,942	4,300	5,200	4,683	5,298	4,354	3,714	3,305	3,002	3,187	44,651
Total Base Non Gas Cost Rate Revenue	$64,766	$80,856	$91,816	$105,485	$127,543	$114,882	$111,675	$91,794	$78,290	$69,414	$63,036	$66,927	$1,066,484
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)
Gas Cost Revenues													
OPEB Surcredit - Rider I	(2,576)	(3,284)	(3,767)	(4,327)	(5,289)	(4,737)	(4,563)	(3,702)	(3,117)	(2,731)	(2,455)	(2,624)	(43,172)
Total Gas Cost Revenues	($2,576)	($3,284)	($3,767)	($4,327)	($5,289)	($4,737)	($4,563)	($3,702)	($3,117)	($2,731)	($2,455)	($2,624)	($43,172)
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($110)	($137)	($156)	($179)	($217)	($195)	($190)	($156)	($133)	($118)	($107)	($114)	($1,812)
Total Revenues	$62,080	$77,435	$87,893	$100,979	$122,037	$109,950	$106,922	$87,936	$75,040	$66,565	$60,474	$64,189	$1,021,500
Unit Margin ($/Mcf)	$1.5261	$1.4944	$1.4796	$1.4799	$1.4638	$1.4722	$1.4856	$1.5053	$1.5248	$1.5426	$1.5584	$1.5484	$1.4995

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Detailed Billed Revenue Workpapers (Current Rates)

LVIS MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	7	7	7	7	7	7	7	7	7	7	7	7	84
Total Volume	33,611	36,879	41,090	42,306	43,391	41,676	44,060	38,786	39,540	34,576	33,708	38,286	467,907
Base Non Gas Cost Rate:													
Basic Service Charge	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00
Volumetric Distribution Charge	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.39%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	7,161	7,161	7,161	7,161	7,161	7,161	7,161	7,161	7,161	7,161	7,161	7,161	85,932
Volumetric Distribution Charge	34,427	37,776	42,088	43,334	44,445	42,689	45,130	39,729	40,500	35,416	34,527	39,217	479,277
DSIC - Distribution System Improvement Charge	1,377	1,487	1,630	2,146	2,193	2,119	2,604	2,335	2,374	2,129	2,084	2,319	24,797
Total Base Non Gas Cost Rate Revenue	$42,965	$46,424	$50,879	$52,641	$53,799	$51,968	$54,896	$49,225	$50,035	$44,706	$43,773	$48,696	$590,006
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)
Gas Cost Revenues													
MMT Gas Cost Charge	$16,469	$18,071	$20,134	$20,730	$21,261	$20,421	$21,589	$19,005	$19,374	$16,942	$16,517	$18,760	$229,273
OPEB Surcredit - Rider I	(2,385)	(2,617)	(2,916)	(3,002)	(3,079)	(2,958)	(3,127)	(2,753)	(2,806)	(2,454)	(2,392)	(2,717)	(33,206)
Total Gas Cost Revenues	$14,084	$15,454	$17,218	$17,728	$18,182	$17,463	$18,462	$16,252	$16,568	$14,488	$14,125	$16,043	$196,067
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($73)	($79)	($86)	($89)	($91)	($88)	($93)	($84)	($85)	($76)	($74)	($83)	($1,001)
Total Revenues	$56,976	$61,799	$68,011	$70,280	$71,890	$69,343	$73,265	$65,393	$66,518	$59,118	$57,824	$64,656	$785,072
Unit Margin ($/Mcf)	$1.2783	$1.2588	$1.2382	$1.2443	$1.2399	$1.2470	$1.2459	$1.2691	$1.2654	$1.2930	$1.2986	$1.2719	$1.2609

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Detailed Billed Revenue Workpapers (Current Rates)

LVIS DMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	19	19	19	19	19	19	19	19	19	19	19	19	228
Total Volume	114,122	130,876	150,894	174,744	210,953	182,707	176,912	144,444	125,034	112,155	105,726	114,949	1,743,516
Base Non Gas Cost Rate:													
Basic Service Charge	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00
Volumetric Distribution Charge	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.37%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	19,437	19,437	19,437	19,437	19,437	19,437	19,437	19,437	19,437	19,437	19,437	19,437	233,244
Volumetric Distribution Charge	116,895	134,056	154,561	178,991	216,079	187,146	181,211	147,954	128,073	114,880	108,295	117,742	1,785,883
DSIC - Distribution System Improvement Charge	4,513	5,081	5,759	8,433	10,009	8,780	9,992	8,336	7,346	6,716	6,387	6,859	88,211
Total Base Non Gas Cost Rate Revenue	$140,845	$158,574	$179,757	$206,861	$245,525	$215,363	$210,640	$175,727	$154,856	$141,033	$134,119	$144,038	$2,107,338
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)
Gas Cost Revenues													
OPEB Surcredit - Rider I	(8,099)	(9,288)	(10,709)	(12,402)	(14,971)	(12,967)	(12,555)	(10,251)	(8,874)	(7,960)	(7,503)	(8,158)	(123,737)
Total Gas Cost Revenues	($8,099)	($9,288)	($10,709)	($12,402)	($14,971)	($12,967)	($12,555)	($10,251)	($8,874)	($7,960)	($7,503)	($8,158)	($123,737)
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($239)	($270)	($306)	($352)	($417)	($366)	($358)	($299)	($263)	($240)	($228)	($245)	($3,583)
Total Revenues	$132,507	$149,016	$168,742	$194,107	$230,137	$202,030	$197,727	$165,177	$145,719	$132,833	$126,388	$135,635	$1,980,018
Unit Margin ($/Mcf)	$1.2342	$1.2116	$1.1913	$1.1838	$1.1639	$1.1787	$1.1907	$1.2166	$1.2385	$1.2575	$1.2686	$1.2531	$1.2087

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

LIS MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	1	1	1	1	1	1	1	1	1	1	1	1	12
Total Volume	26,342	30,732	29,878	28,936	33,089	28,928	32,204	26,058	28,043	29,009	28,399	28,381	349,999
Base Non Gas Cost Rate:													
Basic Service Charge	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00
Volumetric Distribution Charge	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.38%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	13,980
Volumetric Distribution Charge	15,787	18,418	17,906	17,341	19,830	17,337	19,300	15,616	16,806	17,385	17,019	17,009	209,754
DSIC - Distribution System Improvement Charge	561	648	631	787	892	786	1,019	836	895	928	909	909	9,801
Total Base Non Gas Cost Rate Revenue	$17,513	$20,231	$19,702	$19,293	$21,888	$19,288	$21,484	$17,617	$18,866	$19,478	$19,094	$19,082	$233,535
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49001
OPEB Surcredit ($/Mcf) - Rider I	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)
Gas Cost Revenues													
MMT Gas Cost Charge	$12,908	$15,059	$14,640	$14,179	$16,214	$14,175	$15,780	$12,768	$13,741	$14,215	$13,915	$13,907	$171,501
OPEB Surcredit - Rider I	(363)	(423)	(411)	(398)	(456)	(398)	(443)	(359)	(386)	(399)	(391)	(391)	(4,818)
Total Gas Cost Revenues	$12,545	$14,636	$14,229	$13,781	$15,758	$13,777	$15,337	$12,409	$13,355	$13,816	$13,524	$13,516	$166,683
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($30)	($34)	($33)	($33)	($37)	($33)	($37)	($30)	($32)	($33)	($32)	($32)	($396)
Total Revenues	$30,028	$34,833	$33,898	$33,041	$37,609	$33,032	$36,784	$29,996	$32,189	$33,261	$32,586	$32,566	$399,822
Unit Margin ($/Mcf)	$0.6648	$0.6583	$0.6594	$0.6667	$0.6615	$0.6668	$0.6671	$0.6761	$0.6728	$0.6714	$0.6723	$0.6724	$0.6672

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

LIS DMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	9	9	9	9	9	9	9	9	9	9	9	9	108
Total Volume	204,103	246,691	280,271	339,344	379,438	351,214	341,685	257,124	211,848	208,813	202,412	207,612	3,230,556
Base Non Gas Cost Rate:													
Basic Service Charge	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00
Volumetric Distribution Charge	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.37%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	10,485	10,485	10,485	10,485	10,485	10,485	10,485	10,485	10,485	10,485	10,485	10,485	125,820
Volumetric Distribution Charge	122,319	147,842	167,966	203,369	227,397	210,483	204,772	154,095	126,961	125,142	121,305	124,422	1,936,072
DSIC - Distribution System Improvement Charge	4,396	5,241	5,907	9,089	10,110	9,391	10,720	8,196	6,845	6,781	6,590	6,745	90,010
Total Base Non Gas Cost Rate Revenue	$137,200	$163,568	$184,358	$222,943	$247,992	$230,359	$225,977	$172,776	$144,291	$142,408	$138,380	$141,652	$2,151,902
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)
Gas Cost Revenues													
OPEB Surcredit - Rider I	(2,810)	(3,397)	(3,859)	(4,673)	(5,225)	(4,836)	(4,705)	(3,541)	(2,917)	(2,875)	(2,787)	(2,859)	(44,484)
Total Gas Cost Revenues	($2,810)	($3,397)	($3,859)	($4,673)	($5,225)	($4,836)	($4,705)	($3,541)	($2,917)	($2,875)	($2,787)	($2,859)	($44,484)
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($233)	($278)	($313)	($379)	($422)	($392)	($384)	($294)	($245)	($242)	($235)	($241)	($3,658)
Total Revenues	$134,157	$159,893	$180,186	$217,891	$242,345	$225,131	$220,888	$168,941	$141,129	$139,291	$135,358	$138,552	$2,103,760
Unit Margin ($/Mcf)	$0.6722	$0.6630	$0.6578	$0.6570	$0.6536	$0.6559	$0.6614	$0.6720	$0.6811	$0.6820	$0.6837	$0.6823	$0.6661

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Detailed Billed Revenue Workpapers (Current Rates)

LIS DMT Negotiated	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	10	10	10	10	10	10	10	10	10	10	10	10	120
Total Volume	671,603	677,098	741,856	799,412	836,647	805,751	793,497	702,958	666,452	651,062	624,819	664,831	8,635,986
Base Non Gas Cost Rate:													
Basic Service Charge	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00
Volumetric Distribution Charge	$0.31170	$0.30460	$0.28260	$0.27920	$0.28270	$0.28230	$0.28430	$0.29050	$0.29290	$0.32130	$0.32520	$0.32270	$0.29694
DSIC - Distribution System Improvement Charge	3.31%	3.31%	3.31%	4.25%	4.25%	4.25%	4.98%	4.98%	4.98%	5.00%	5.00%	5.00%	4.38%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	139,800
Volumetric Distribution Charge	209,339	206,244	209,649	223,196	236,520	227,463	225,591	204,209	195,204	209,186	203,191	214,541	2,564,333
DSIC - Distribution System Improvement Charge	7,315	7,212	7,325	9,981	10,547	10,162	11,815	10,750	10,301	11,042	10,742	11,310	118,502
Total Base Non Gas Cost Rate Revenue	$228,303	$225,106	$228,623	$244,827	$258,717	$249,276	$249,056	$226,609	$217,155	$231,878	$225,583	$237,501	$2,822,635
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)
Gas Cost Revenues													
OPEB Surcredit - Rider I	(9,248)	(9,324)	(10,215)	(11,008)	(11,521)	(11,095)	(10,926)	(9,680)	(9,177)	(8,965)	(8,604)	(9,155)	(118,918)
Total Gas Cost Revenues	($9,248)	($9,324)	($10,215)	($11,008)	($11,521)	($11,095)	($10,926)	($9,680)	($9,177)	($8,965)	($8,604)	($9,155)	($118,918)
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($388)	($383)	($389)	($416)	($440)	($424)	($423)	($385)	($369)	($394)	($383)	($404)	($4,798)
Total Revenues	$218,667	$215,399	$218,019	$233,403	$246,756	$237,757	$237,707	$216,544	$207,609	$222,519	$216,596	$227,942	$2,698,919
Unit Margin ($/Mcf)	$0.3399	$0.3325	$0.3082	$0.3063	$0.3092	$0.3094	$0.3139	$0.3224	$0.3258	$0.3562	$0.3610	$0.3572	$0.3268

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Forfeited Discounts (Current Rates)

	Revenues							Forfeited
	Residential	Commercial	Public Authority	Industrial	Transportation	Total	Factor	Discounts
10/31/2025	7,592,209	1,067,803	145,366	79,384	2,193,518	11,078,280	0.71120%	78,789
11/30/2025	13,922,177	2,040,032	165,509	123,621	3,038,863	19,290,202	0.49120%	94,753
12/31/2025	23,412,675	3,510,065	206,614	233,293	4,161,303	31,523,950	0.31277%	98,599
1/31/2026	29,236,590	4,455,049	256,592	308,674	5,063,757	39,320,662	0.37254%	146,485
2/28/2026	29,108,472	4,490,330	227,003	338,631	5,401,219	39,565,655	0.39280%	155,414
3/31/2026	25,669,934	3,936,783	210,260	284,433	4,879,170	34,980,580	0.39633%	138,639
4/30/2026	20,144,311	3,090,528	178,601	219,357	4,309,282	27,942,080	0.39253%	109,681
5/31/2026	13,561,469	2,032,840	138,567	142,129	3,227,683	19,102,688	0.54181%	103,501
6/30/2026	7,156,258	1,058,329	104,450	79,466	2,378,068	10,776,570	0.74794%	80,602
7/31/2026	4,908,495	729,885	101,525	70,086	2,023,091	7,833,082	0.78040%	61,129
8/31/2026	4,637,047	682,108	89,623	51,777	1,968,389	7,428,944	0.94003%	69,835
9/30/2026	5,019,404	630,508	228,558	55,788	2,049,335	7,983,592	0.88512%	70,664
Total	$ 184,369,039	$ 27,724,261	$ 2,052,667	$ 1,986,639	$ 40,693,679	$ 256,826,285	0.47039%	$1,208,090

NATIONAL FUEL EXHIBIT CTM-4

FUTURE TEST YEAR

PROPOSED RATES

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Summary of Revenues (Proposed Rates)

	Account	Reference	Total Revenue	Total Gas Cost	Total Delivery
Gas Sales					
Residential	480	CTM-4, Sch. 2	180,765,090	96,107,327	84,657,764
Commercial	481	""	27,268,646	16,366,271	10,902,375
Industrial	481	""	1,958,527	1,284,084	674,443
Public Authority	481	""	2,021,272	1,275,764	745,508
Subtotal			212,013,535	115,033,446	96,980,090
Transportation					
Residential	489	CTM-4, Sch. 2	8,289,210	413,160	7,876,050
Commercial	489	""	11,663,313	1,295,828	10,367,485
Industrial	489	""	14,035,893	1,127,451	12,908,442
Public Authority	489	""	5,167,229	725,224	4,442,005
Subtotal			39,155,646	3,561,663	35,593,983
Total Billed Revenue			251,169,181	118,595,109	132,574,073
Other Operating Revenues					
Forfeited Discounts	487	CTM-4, Sch. 5	1,179,370	0	1,179,370
Rent From Gas Property	493		100,267	0	100,267
Other Gas Revenues	495		47,653	0	47,653
Subtotal			1,327,289	0	1,327,289
Total Operating Revenue			252,496,471	118,595,109	133,901,362

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Summary of Revenues by Service Class (Proposed Rates)

	Account	Reference (CTM-4, Sch. 4)	Average Customers	Total Usage (Mcf)	Total Revenue	Total Gas Cost	Total Delivery
Residential Sales	480	Page 1	173,999	16,501,733	173,815,979	92,390,814	81,425,165
Residential CAP	480	Page 2	6,467	678,491	6,949,111	3,716,513	3,232,598
Residential SATC	489	Page 3	16,528	1,584,984	7,826,543	369,241	7,457,302
Residential MMT	489	Page 4	474	114,750	462,667	43,919	418,748
Total Residential			197,467	18,879,957	189,054,300	96,520,487	92,533,814
Small Commercial < 250 Sales	481	Page 5	8,117	896,928	9,812,817	5,006,137	4,806,680
Small Commercial < 250 SATC	489	Page 6	656	77,242	415,632	26,251	389,381
Small Commercial < 250 MMT	489	Page 7	1,055	144,547	732,748	59,569	673,179
Small Commercial > 250 Sales	481	Page 8	2,668	1,238,053	10,789,272	6,897,310	3,891,962
Small Commercial > 250 SATC	489	Page 9	266	124,996	415,435	40,966	374,469
Small Commercial > 250 MMT	489	Page 10	1,125	643,436	2,065,492	246,544	1,818,948
Large Commercial	481	Page 11	428	716,414	6,069,547	4,008,843	2,060,704
Large Commercial SATC	489	Page 12	47	73,103	231,648	25,777	205,871
Large Commercial MMT	489	Page 13	726	2,641,126	6,678,043	981,547	5,696,496
Large Commercial DMT	489	Page 14	11	716,683	1,124,316	(84,826)	1,209,142
Natural Gas Vechicles	481	Page 15	7	79,802	597,011	453,981	143,030
Total Commercial			15,107	7,352,328	38,931,959	17,662,099	21,269,860
Small Public Authority < 250 Sales	481	Page 16	379	132,038	1,182,643	738,925	443,718
Small Public Authority < 250 SATC	489	Page 17	23	2,523	14,087	856	13,231
Small Public Authority < 250 MMT	489	Page 18	204	31,199	150,350	12,858	137,492
Small Public Authority > 250 Sales	481	Page 19	116	39,148	355,213	218,017	137,196
Small Public Authority > 250 SATC	489	Page 20	19	10,118	32,497	3,313	29,184
Small Public Authority > 250 MMT	489	Page 21	211	112,995	368,725	43,297	325,428
Large Public Authority	481	Page 22	34	56,990	483,416	318,822	164,594
Large Public Authority SATC	489	Page 23	3	3,788	13,050	1,336	11,714
Large Public Authority MMT	489	Page 24	283	1,850,205	4,270,018	687,610	3,582,408
Large Public Authority DMT	489	Page 25	3	203,162	318,503	(24,046)	342,549
Total Public Authority			1,276	2,442,165	7,188,501	2,000,988	5,187,513
SVIS Sales	481	Page 26	125	59,062	584,792	332,094	252,698
SVIS SATC	489	Page 27	11	4,900	22,822	1,880	20,942
SVIS MMT	489	Page 28	62	38,326	158,400	17,967	140,433
IVIS Sales	481	Page 29	56	171,352	1,373,735	951,990	421,745
IVIS SATC	489	Page 30	3	5,658	18,355	1,762	16,593
IVIS MMT	489	Page 31	271	2,500,356	5,222,562	1,073,403	4,149,159
IVIS DMT	489	Page 32	24	711,214	976,924	(43,172)	1,020,096
LVIS MMT	489	Page 33	7	467,907	760,314	196,067	564,247
LVIS DMT	489	Page 34	19	1,743,516	1,891,958	(123,737)	2,015,695
LIS MMT	489	Page 35	1	349,999	390,036	166,683	223,353
LIS DMT	489	Page 36	9	3,230,556	2,013,902	(44,484)	2,058,386
LIS DMT Negotiated	489	Page 37	10	8,635,986	2,580,619	(118,918)	2,699,537
Total Industrial			598	17,918,832	15,994,420	2,411,535	13,582,885
Grand Total			**214,448**	**46,593,282**	**251,169,181**	**118,595,109**	**132,574,073**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Billed Delivery Revenues by Rate Type (Proposed Rates)

	Account	Reference (CTM-4, Sch. 4)	Basic Service Charge	Distribution Charge	Rider B	DSIC	Rider E	Rider G	Rider H	Total Delivery
Residential Sales	480	Page 1	29,231,761	48,863,281	(138,657)	0	0	1,572,731	1,896,049	81,425,165
Residential CAP	480	Page 2	1,086,383	2,009,080	(5,505)	0	0	64,682	77,959	3,232,598
Residential SATC	489	Page 3	2,776,706	4,693,295	(12,699)	0	0	0	0	7,457,302
Residential MMT	489	Page 4	79,676	339,785	(713)	0	0	0	0	418,748
Total Residential			33,174,526	55,905,441	(157,574)	0	0	1,637,413	1,974,008	92,533,814
Small Commercial < 250 Sales	481	Page 5	2,629,962	2,062,397	(8,184)	0	0	19,448	103,057	4,806,680
Small Commercial < 250 SATC	489	Page 6	212,436	177,609	(664)	0	0	0	0	389,381
Small Commercial < 250 MMT	489	Page 7	341,955	332,371	(1,147)	0	0	0	0	673,179
Small Commercial > 250 Sales	481	Page 8	1,184,666	2,544,817	(6,627)	0	0	26,853	142,252	3,891,962
Small Commercial > 250 SATC	489	Page 9	118,178	256,929	(638)	0	0	0	0	374,469
Small Commercial > 250 MMT	489	Page 10	499,463	1,322,583	(3,098)	0	0	0	0	1,818,948
Large Commercial	481	Page 11	775,536	1,190,823	(3,509)	0	0	15,538	82,316	2,060,704
Large Commercial SATC	489	Page 12	84,711	121,512	(352)	0	0	0	0	205,871
Large Commercial MMT	489	Page 13	1,316,116	4,390,080	(9,700)	0	0	0	0	5,696,496
Large Commercial DMT	489	Page 14	19,932	1,191,270	(2,060)	0	0	0	0	1,209,142
Natural Gas Vechicles	481	Page 15	0	143,274	(244)	0	0	0	0	143,030
Total Commercial			7,182,955	13,733,664	(36,223)	0	0	61,839	327,625	21,269,860
Small Public Authority < 250 Sales	481	Page 16	122,823	303,608	(755)	0	0	2,871	15,171	443,718
Small Public Authority < 250 SATC	489	Page 17	7,452	5,801	(22)	0	0	0	0	13,231
Small Public Authority < 250 MMT	489	Page 18	65,988	71,739	(235)	0	0	0	0	137,492
Small Public Authority > 250 Sales	481	Page 19	51,615	80,469	(235)	0	0	849	4,498	137,196
Small Public Authority > 250 SATC	489	Page 20	8,436	20,798	(50)	0	0	0	0	29,184
Small Public Authority > 250 MMT	489	Page 21	93,721	232,262	(555)	0	0	0	0	325,428
Large Public Authority	481	Page 22	62,363	94,728	(281)	0	0	1,236	6,548	164,594
Large Public Authority SATC	489	Page 23	5,436	6,297	(19)	0	0	0	0	11,714
Large Public Authority MMT	489	Page 24	513,098	3,075,410	(6,100)	0	0	0	0	3,582,408
Large Public Authority DMT	489	Page 25	5,436	337,695	(582)	0	0	0	0	342,549
Total Public Authority			936,368	4,228,806	(8,834)	0	0	4,955	26,217	5,187,513
SVIS Sales	481	Page 26	122,672	122,389	(429)	0	0	1,280	6,786	252,698
SVIS SATC	489	Page 27	10,824	10,155	(37)	0	0	0	0	20,942
SVIS MMT	489	Page 28	61,254	79,419	(240)	0	0	0	0	140,433
IVIS Sales	481	Page 29	170,352	228,704	(717)	0	0	3,717	19,688	421,745
IVIS SATC	489	Page 30	9,072	7,551	(30)	0	0	0	0	16,593
IVIS MMT	489	Page 31	819,000	3,337,225	(7,066)	0	0	0	0	4,149,159
IVIS DMT	489	Page 32	72,576	949,257	(1,737)	0	0	0	0	1,020,096
LVIS MMT	489	Page 33	85,932	479,277	(962)	0	0	0	0	564,247
LVIS DMT	489	Page 34	233,244	1,785,883	(3,432)	0	0	0	0	2,015,695
LIS MMT	489	Page 35	13,980	209,754	(381)	0	0	0	0	223,353
LIS DMT	489	Page 36	125,820	1,936,072	(3,506)	0	0	0	0	2,058,386
LIS DMT Negotiated	489	Page 37	139,800	2,564,333	(4,596)	0	0	0	0	2,699,537
Total Industrial			1,864,526	11,710,020	(23,133)	0	0	4,997	26,475	13,582,885
Grand Total			**43,158,375**	**85,577,932**	**(225,764)**	**0**	**0**	**1,709,205**	**2,354,325**	**132,574,073**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Detailed Billed Revenue Workpapers (Proposed Rates)

Residential Sales Service	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	171,166	171,990	173,698	174,567	175,271	176,003	175,931	174,946	174,192	174,020	173,276	172,922	2,087,983
Total Volume	525,681	1,222,673	2,247,666	2,868,059	2,859,720	2,496,202	1,893,466	1,175,381	486,914	246,821	218,596	260,555	16,501,733
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.09879	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09531
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$2,396,325	$2,407,854	$2,431,775	$2,443,940	$2,453,797	$2,464,045	$2,463,038	$2,449,238	$2,438,691	$2,436,286	$2,425,866	$2,420,906	$29,231,761
Volumetric Distribution Charge	1,556,593	3,620,456	6,655,564	8,492,609	8,467,917	7,391,504	5,606,742	3,480,420	1,441,801	730,861	647,284	771,529	48,863,281
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	51,932	116,389	213,961	273,018	272,224	237,620	180,244	111,887	46,351	23,495	20,809	24,803	1,572,731
Rider H - Gas Procurement Charge	60,401	140,485	258,257	329,540	328,582	286,814	217,559	135,051	55,946	28,360	25,117	29,938	1,896,049
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$4,065,250	$6,285,185	$9,559,557	$11,539,107	$11,522,520	$10,379,983	$8,467,583	$6,176,596	$3,982,789	$3,219,002	$3,119,076	$3,247,176	$81,563,822
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44535
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03911
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20420
Rider F - CAP Discount Charge	$0.13140	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12230	$0.12259
OPEB Surcredit ($/Mcf) - Rider I	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$234,927	$544,456	$1,000,886	$1,277,147	$1,273,433	$1,111,559	$843,160	$523,397	$216,823	$109,909	$97,341	$116,025	$7,349,063
Natural Gas Supply Charge ($/Mcf) - Rider A	2,740,163	6,154,200	11,313,403	14,436,088	14,394,115	12,564,384	9,530,571	5,916,161	2,450,833	1,242,348	1,100,280	1,311,476	83,154,022
Gas Adjustment Charge ($/Mcf) - Rider A	116,859	248,936	457,625	583,937	582,239	508,227	385,510	239,308	99,136	50,253	44,506	53,049	3,369,585
Rider F - CAP Discount Charge	69,074	149,533	274,890	350,764	349,744	305,286	231,571	143,749	59,550	30,186	26,734	31,866	2,022,946
OPEB Surcredit - Rider I	(111,649)	(259,683)	(477,382)	(609,147)	(607,376)	(530,168)	(402,153)	(249,639)	(103,416)	(52,422)	(46,428)	(55,339)	(3,504,802)
Total Gas Cost Revenues	$3,049,374	$6,837,442	$12,569,422	$16,038,789	$15,992,155	$13,959,288	$10,588,659	$6,572,976	$2,722,926	$1,380,274	$1,222,433	$1,457,077	$92,390,814
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($6,911)	($10,685)	($16,251)	($19,616)	($19,588)	($17,646)	($14,395)	($10,500)	($6,771)	($5,472)	($5,302)	($5,520)	($138,657)
Total Revenues	$7,107,714	$13,111,941	$22,112,727	$27,558,279	$27,495,086	$24,321,624	$19,041,847	$12,739,072	$6,698,944	$4,593,804	$4,336,207	$4,698,732	$173,815,979
Unit Margin ($/Mcf)	$7.7333	$5.1405	$4.2531	$4.0233	$4.0292	$4.1583	$4.4720	$5.2550	$8.1797	$13.0419	$14.2687	$12.4625	$4.9427

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Detailed Billed Revenue Workpapers (Proposed Rates)

Residential CAP	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	8,041	7,500	7,103	6,953	6,591	6,017	5,865	6,278	6,200	5,655	5,680	5,715	77,599
Total Volume	26,222	56,662	101,063	124,261	117,536	93,759	67,892	48,239	19,190	8,100	7,048	8,521	678,491
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.09879	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09519	$0.09533
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$112,567	$105,004	$99,445	$97,335	$92,280	$84,238	$82,117	$87,897	$86,799	$79,171	$79,514	$80,016	$1,086,383
Volumetric Distribution Charge	77,645	167,782	299,258	367,948	348,037	277,629	201,034	142,840	56,823	23,984	20,871	25,230	2,009,080
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	2,590	5,394	9,620	11,829	11,189	8,925	6,463	4,592	1,827	771	671	811	64,682
Rider H - Gas Procurement Charge	3,013	6,510	11,612	14,278	13,505	10,773	7,801	5,543	2,205	931	810	979	77,959
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$195,815	$284,691	$419,935	$491,390	$465,011	$381,565	$297,414	$240,871	$147,654	$104,856	$101,866	$107,036	$3,238,103
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44536
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.04032
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20432
OPEB Surcredit ($/Mcf) - Rider I	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$11,718	$25,232	$45,003	$55,333	$52,339	$41,751	$30,232	$21,481	$8,545	$3,607	$3,139	$3,794	$302,174
Natural Gas Supply Charge ($/Mcf) - Rider A	136,682	285,203	508,691	625,453	591,608	471,924	341,725	242,805	96,590	40,769	35,477	42,887	3,419,814
Gas Adjustment Charge ($/Mcf) - Rider A	5,829	11,536	20,576	25,299	23,930	19,089	13,823	9,821	3,907	1,649	1,435	1,735	138,629
OPEB Surcredit - Rider I	(5,569)	(12,034)	(21,465)	(26,392)	(24,964)	(19,913)	(14,419)	(10,245)	(4,076)	(1,720)	(1,497)	(1,810)	(144,104)
Total Gas Cost Revenues	$148,660	$309,937	$552,805	$679,693	$642,913	$512,851	$371,361	$263,862	$104,966	$44,305	$38,554	$46,606	$3,716,513
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($333)	($484)	($714)	($835)	($791)	($649)	($506)	($409)	($251)	($178)	($173)	($182)	($5,505)
Total Revenues	$344,142	$594,144	$972,026	$1,170,248	$1,107,133	$893,767	$668,269	$504,324	$252,369	$148,983	$140,247	$153,460	$6,949,111
Unit Margin ($/Mcf)	$7.4677	$5.0244	$4.1552	$3.9545	$3.9563	$4.0697	$4.3807	$4.9933	$7.6944	$12.9458	$14.4524	$12.5621	$4.7725

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Detailed Billed Revenue Workpapers (Proposed Rates)

Residential SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	16,372	16,253	16,214	16,262	16,258	16,327	16,376	16,572	16,739	16,836	17,022	17,107	198,336
Total Volume	52,458	118,265	215,981	274,651	271,934	236,922	180,861	114,594	47,366	24,474	21,795	25,684	1,584,984
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$229,208	$227,542	$226,991	$227,668	$227,608	$228,576	$229,262	$232,005	$234,343	$235,701	$238,304	$239,500	$2,776,706
Volumetric Distribution Charge	155,332	350,194	639,541	813,268	805,225	701,548	535,547	339,325	140,255	72,470	64,537	76,054	4,693,295
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$384,540	$577,735	$866,532	$1,040,936	$1,032,833	$930,124	$764,808	$571,330	$374,598	$308,170	$302,840	$315,554	$7,470,001
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44535
OPEB Surcredit ($/Mcf) - Rider I	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)	($0.21239)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$23,443	$52,663	$96,176	$122,302	$121,092	$105,501	$80,537	$51,029	$21,092	$10,898	$9,705	$11,437	$705,875
OPEB Surcredit - Rider I	(11,141)	(25,118)	(45,872)	(58,333)	(57,756)	(50,320)	(38,413)	(24,339)	(10,060)	(5,198)	(4,629)	(5,455)	(336,634)
Total Gas Cost Revenues	$12,302	$27,545	$50,304	$63,969	$63,336	$55,181	$42,124	$26,690	$11,032	$5,700	$5,076	$5,982	$369,241
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($654)	($982)	($1,473)	($1,770)	($1,756)	($1,581)	($1,300)	($971)	($637)	($524)	($515)	($536)	($12,699)
Total Revenues	$396,188	$604,298	$915,363	$1,103,135	$1,094,413	$983,724	$805,632	$597,049	$384,993	$313,346	$307,401	$321,000	$7,826,543
Unit Margin ($/Mcf)	$7.3305	$4.8851	$4.0121	$3.7900	$3.7981	$3.9259	$4.2287	$4.9857	$7.9086	$12.5918	$13.8950	$12.2858	$4.7130

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Detailed Billed Revenue Workpapers (Proposed Rates)

Residential MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	457	459	462	462	464	465	467	466	467	508	508	506	5,691
Total Volume	2,769	7,958	14,881	20,189	21,125	18,601	14,148	8,375	3,149	1,233	991	1,329	114,750
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	6,405	6,428	6,468	6,473	6,491	6,509	6,543	6,528	6,538	7,109	7,106	7,079	79,676
Volumetric Distribution Charge	8,200	23,564	44,065	59,783	62,554	55,080	41,894	24,799	9,326	3,651	2,935	3,936	339,785
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$14,604	$29,991	$50,533	$66,256	$69,045	$61,589	$48,437	$31,327	$15,864	$10,760	$10,040	$11,015	$419,461
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49001
OPEB Surcredit ($/Mcf) - Rider I	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10726)	($0.10727)
Gas Cost Revenues													
MMT Gas Cost Charge	$1,357	$3,899	$7,292	$9,893	$10,351	$9,115	$6,933	$4,104	$1,543	$604	$486	$651	$56,228
OPEB Surcredit - Rider I	($297)	($854)	($1,596)	($2,166)	($2,266)	($1,995)	($1,518)	($898)	($338)	($132)	($106)	($143)	($12,309)
Total Gas Cost Revenues	$1,060	$3,045	$5,696	$7,727	$8,085	$7,120	$5,415	$3,206	$1,205	$472	$380	$508	$43,919
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($25)	($51)	($86)	($113)	($117)	($105)	($82)	($53)	($27)	($18)	($17)	($19)	($713)
Total Revenues	$15,639	$32,985	$56,143	$73,870	$77,013	$68,604	$53,770	$34,480	$17,042	$11,214	$10,403	$11,504	$462,667
Unit Margin ($/Mcf)	$5.2741	$3.7689	$3.3957	$3.2817	$3.2684	$3.3110	$3.4236	$3.7406	$5.0371	$8.7266	$10.1311	$8.2862	$3.6554

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Proposed Rates)

Small Commercial < 250 Sales	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	7,920	8,023	8,165	8,248	8,277	8,251	8,234	8,192	8,116	8,028	7,982	7,970	97,406
Total Volume	20,801	64,680	130,415	170,612	169,957	145,567	107,071	61,915	18,086	2,894	1,166	3,763	896,928
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.02248	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02168
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$213,840	$216,621	$220,455	$222,696	$223,479	$222,777	$222,318	$221,184	$219,132	$216,756	$215,514	$215,190	$2,629,962
Volumetric Distribution Charge	47,831	148,726	299,876	392,305	390,799	334,716	246,199	142,367	41,588	6,654	2,682	8,653	2,062,397
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	468	1,401	2,825	3,696	3,682	3,153	2,320	1,341	392	63	25	82	19,448
Rider H - Gas Procurement Charge	2,390	7,432	14,985	19,603	19,528	16,726	12,302	7,114	2,078	332	134	432	103,057
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$264,529	$374,180	$538,141	$638,300	$637,488	$577,373	$483,139	$372,006	$263,190	$223,805	$218,355	$224,357	$4,814,864
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44534
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03755
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20403
OPEB Surcredit ($/Mcf) - Rider I	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$9,296	$28,802	$58,074	$75,973	$75,682	$64,821	$47,679	$27,571	$8,054	$1,289	$519	$1,676	$399,436
Natural Gas Supply Charge ($/Mcf) - Rider A	108,429	325,561	656,431	858,758	855,461	732,696	538,932	311,642	91,036	14,566	5,871	18,942	$4,518,325
Gas Adjustment Charge ($/Mcf) - Rider A	4,624	13,169	26,552	34,737	34,603	29,637	21,800	12,606	3,682	589	237	766	$183,002
OPEB Surcredit - Rider I	(2,195)	(6,824)	(13,759)	(18,000)	(17,930)	(15,357)	(11,296)	(6,532)	(1,908)	(305)	(123)	(397)	(94,626)
Total Gas Cost Revenues	$120,154	$360,708	$727,298	$951,468	$947,816	$811,797	$597,115	$345,287	$100,864	$16,139	$6,504	$20,987	$5,006,137
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($450)	($636)	($915)	($1,085)	($1,084)	($982)	($821)	($632)	($447)	($380)	($371)	($381)	($8,184)
Total Revenues	$384,233	$734,252	$1,264,524	$1,588,683	$1,584,220	$1,388,188	$1,079,433	$716,661	$363,607	$239,564	$224,488	$244,963	$9,812,817
Unit Margin ($/Mcf)	$12.7169	$5.7851	$4.1264	$3.7412	$3.7509	$3.9664	$4.5123	$6.0084	$14.5518	$77.3403	$187.1971	$59.6173	$5.3682

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Proposed Rates)

Small Commercial < 250 SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	684	687	680	675	667	644	645	643	640	640	633	630	7,868
Total Volume	1,977	5,912	11,506	14,764	14,483	12,026	8,901	5,193	1,583	325	179	392	77,242
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$18,468	$18,549	$18,360	$18,225	$18,009	$17,388	$17,415	$17,361	$17,280	$17,280	$17,091	$17,010	$212,436
Volumetric Distribution Charge	4,546	13,595	26,457	33,949	33,302	27,652	20,468	11,941	3,640	747	411	902	177,609
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$23,014	$32,144	$44,817	$52,174	$51,311	$45,040	$37,883	$29,302	$20,920	$18,027	$17,502	$17,912	$390,045
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44537
OPEB Surcredit ($/Mcf) - Rider I	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10551)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$884	$2,633	$5,124	$6,575	$6,449	$5,355	$3,964	$2,312	$705	$145	$80	$175	$34,401
OPEB Surcredit - Rider I	(209)	(624)	(1,214)	(1,558)	(1,528)	(1,269)	(939)	(548)	(167)	(34)	(19)	(41)	(8,150)
Total Gas Cost Revenues	$675	$2,009	$3,910	$5,017	$4,921	$4,086	$3,025	$1,764	$538	$111	$61	$134	$26,251
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($39)	($55)	($76)	($89)	($87)	($77)	($64)	($50)	($36)	($31)	($30)	($30)	($664)
Total Revenues	$23,650	$34,098	$48,651	$57,102	$56,145	$49,049	$40,844	$31,016	$21,422	$18,107	$17,533	$18,016	$415,632
Unit Margin ($/Mcf)	$11.6404	$5.4367	$3.8951	$3.5338	$3.5429	$3.7453	$4.2559	$5.6425	$13.2165	$55.4978	$97.9024	$45.6494	$5.0497

National Fuel Gas Distribution Corporation
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Detailed Billed Revenue Workpapers (Proposed Rates)

Small Commercial < 250 MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	1,033	1,042	1,049	1,059	1,061	1,044	1,051	1,056	1,061	1,062	1,073	1,074	12,665
Total Volume	3,196	8,727	18,568	28,236	30,042	23,837	16,186	7,520	3,002	1,886	1,439	1,909	144,547
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	27,891	28,134	28,323	28,593	28,647	28,188	28,377	28,512	28,647	28,674	28,971	28,998	341,955
Volumetric Distribution Charge	7,348	20,067	42,695	64,925	69,079	54,810	37,218	17,292	6,902	4,336	3,310	4,390	332,371
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$35,239	$48,201	$71,018	$93,518	$97,726	$82,998	$65,595	$45,804	$35,549	$33,010	$32,281	$33,388	$674,326
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07789)
Gas Cost Revenues													
MMT Gas Cost Charge	$1,566	$4,276	$9,098	$13,835	$14,721	$11,680	$7,931	$3,685	$1,471	$924	$705	$936	$70,828
OPEB Surcredit - Rider I	(249)	(680)	(1,446)	(2,199)	(2,340)	(1,856)	(1,261)	(586)	(234)	(147)	(112)	(149)	(11,259)
Total Gas Cost Revenues	$1,317	$3,596	$7,652	$11,636	$12,381	$9,824	$6,670	$3,099	$1,237	$777	$593	$787	$59,569
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($60)	($82)	($121)	($159)	($166)	($141)	($112)	($78)	($60)	($56)	($55)	($57)	($1,147)
Total Revenues	$36,496	$51,715	$78,549	$104,995	$109,941	$92,681	$72,153	$48,825	$36,726	$33,731	$32,819	$34,118	$732,748
Unit Margin ($/Mcf)	$11.0274	$5.5232	$3.8248	$3.3121	$3.2530	$3.4819	$4.0526	$6.0908	$11.8428	$17.5064	$22.4261	$17.4879	$4.6651

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Proposed Rates)

Small Commercial > 250 Sales	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	2,626	2,633	2,653	2,665	2,675	2,688	2,699	2,700	2,683	2,674	2,662	2,660	32,018
Total Volume	39,818	91,659	168,332	214,506	213,938	186,805	142,280	89,162	36,861	18,644	16,474	19,574	1,238,053
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.02248	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02169
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$97,162	$97,421	$98,161	$98,605	$98,975	$99,456	$99,863	$99,900	$99,271	$98,938	$98,494	$98,420	$1,184,666
Volumetric Distribution Charge	81,847	188,405	346,007	440,917	439,749	383,977	292,456	183,272	75,768	38,324	33,862	40,234	2,544,817
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	895	1,986	3,647	4,647	4,635	4,047	3,082	1,932	799	404	357	424	26,853
Rider H - Gas Procurement Charge	4,575	10,532	19,341	24,647	24,581	21,464	16,348	10,245	4,235	2,142	1,893	2,249	142,252
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$184,479	$298,344	$467,156	$568,815	$567,940	$508,944	$411,749	$295,348	$180,073	$139,808	$134,606	$141,327	$3,898,589
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44535
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03916
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20420
OPEB Surcredit ($/Mcf) - Rider I	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$17,795	$40,816	$74,958	$95,519	$95,267	$83,184	$63,357	$39,704	$16,414	$8,302	$7,336	$8,716	$551,368
Natural Gas Supply Charge ($/Mcf) - Rider A	207,557	461,357	847,285	1,079,693	1,076,835	940,263	716,150	448,787	185,537	93,845	82,919	98,522	6,238,750
Gas Adjustment Charge ($/Mcf) - Rider A	8,852	18,662	34,272	43,673	43,558	38,033	28,968	18,153	7,505	3,796	3,354	3,985	252,811
OPEB Surcredit - Rider I	(4,683)	(10,781)	(19,799)	(25,230)	(25,163)	(21,972)	(16,735)	(10,487)	(4,336)	(2,193)	(1,938)	(2,302)	(145,619)
Total Gas Cost Revenues	$229,521	$510,054	$936,716	$1,193,655	$1,190,497	$1,039,508	$791,740	$496,157	$205,120	$103,750	$91,671	$108,921	$6,897,310
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($314)	($507)	($794)	($967)	($965)	($865)	($700)	($502)	($306)	($238)	($229)	($240)	($6,627)
Total Revenues	$413,686	$807,891	$1,403,078	$1,761,503	$1,757,472	$1,547,587	$1,202,789	$791,003	$384,887	$243,320	$226,048	$250,008	$10,789,272
Unit Margin ($/Mcf)	$4.6330	$3.2549	$2.7752	$2.6517	$2.6547	$2.7245	$2.8939	$3.3125	$4.8852	$7.4986	$8.1709	$7.2202	$3.1490

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Detailed Billed Revenue Workpapers (Proposed Rates)

Small Commercial > 250 SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	282	284	281	271	267	267	263	257	254	254	257	257	3,194
Total Volume	4,604	9,966	17,532	21,315	20,861	18,195	13,715	8,572	3,799	2,159	1,995	2,282	124,996
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$10,434	$10,508	$10,397	$10,027	$9,879	$9,879	$9,731	$9,509	$9,398	$9,398	$9,509	$9,509	$118,178
Volumetric Distribution Charge	9,463	20,486	36,038	43,813	42,880	37,401	28,191	17,619	7,808	4,438	4,100	4,691	256,929
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$19,897	$30,994	$46,435	$53,840	$52,759	$47,280	$37,922	$27,128	$17,206	$13,836	$13,609	$14,200	$375,107
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44535
OPEB Surcredit ($/Mcf) - Rider I	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11761)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$2,057	$4,438	$7,807	$9,492	$9,289	$8,102	$6,107	$3,817	$1,692	$962	$888	$1,016	$55,667
OPEB Surcredit - Rider I	(541)	(1,172)	(2,062)	(2,507)	(2,454)	(2,140)	(1,613)	(1,008)	(447)	(254)	(235)	(268)	(14,701)
Total Gas Cost Revenues	$1,516	$3,266	$5,745	$6,985	$6,835	$5,962	$4,494	$2,809	$1,245	$708	$653	$748	$40,966
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($34)	($53)	($79)	($92)	($90)	($80)	($64)	($46)	($29)	($24)	($23)	($24)	($638)
Total Revenues	$21,379	$34,207	$52,101	$60,733	$59,504	$53,162	$42,352	$29,891	$18,422	$14,520	$14,239	$14,924	$415,435
Unit Margin ($/Mcf)	$4.3219	$3.1098	$2.6485	$2.5259	$2.5291	$2.5984	$2.7650	$3.1648	$4.5295	$6.4078	$6.8222	$6.2222	$3.0010

National Fuel Gas Distribution Corporation
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Detailed Billed Revenue Workpapers (Proposed Rates)

Small Commercial > 250 MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	1,106	1,107	1,111	1,113	1,110	1,125	1,134	1,136	1,133	1,138	1,143	1,143	13,499
Total Volume	21,036	47,884	87,223	110,753	109,705	96,684	74,027	46,586	19,544	10,146	9,099	10,749	643,436
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	40,922	40,959	41,107	41,181	41,070	41,625	41,958	42,032	41,921	42,106	42,291	42,291	499,463
Volumetric Distribution Charge	43,239	98,425	179,288	227,653	225,499	198,734	152,162	95,757	40,174	20,855	18,704	22,095	1,322,583
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$84,161	$139,384	$220,395	$268,834	$266,569	$240,359	$194,120	$137,789	$82,095	$62,961	$60,995	$64,386	$1,822,046
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)
Gas Cost Revenues													
MMT Gas Cost Charge	$10,307	$23,463	$42,739	$54,269	$53,755	$47,375	$36,273	$22,827	$9,577	$4,971	$4,459	$5,267	$315,282
OPEB Surcredit - Rider I	(2,247)	(5,115)	(9,318)	(11,832)	(11,720)	(10,329)	(7,908)	(4,977)	(2,088)	(1,084)	(972)	(1,148)	(68,738)
Total Gas Cost Revenues	$8,060	$18,348	$33,421	$42,437	$42,035	$37,046	$28,365	$17,850	$7,489	$3,887	$3,487	$4,119	$246,544
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($143)	($237)	($375)	($457)	($453)	($409)	($330)	($234)	($140)	($107)	($104)	($109)	($3,098)
Total Revenues	$92,078	$157,495	$253,441	$310,814	$308,151	$276,996	$222,155	$155,405	$89,444	$66,741	$64,378	$68,396	$2,065,492
Unit Margin ($/Mcf)	$4.0009	$2.9109	$2.5268	$2.4273	$2.4299	$2.4860	$2.6223	$2.9577	$4.2004	$6.2056	$6.7032	$5.9898	$2.8317

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Proposed Rates)

Large Commercial	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	422	426	431	437	440	437	429	428	419	421	421	425	5,136
Total Volume	22,085	49,540	88,460	117,750	124,113	106,718	83,296	50,859	27,677	20,855	19,122	5,938	716,414
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.02248	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02169
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$63,722	$64,326	$65,081	$65,987	$66,440	$65,987	$64,779	$64,628	$63,269	$63,571	$63,571	$64,175	$775,536
Volumetric Distribution Charge	36,709	82,345	147,039	195,723	206,301	177,387	138,455	84,538	46,005	34,664	31,785	9,870	1,190,823
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	497	1,073	1,916	2,551	2,689	2,312	1,804	1,102	600	452	414	129	15,538
Rider H - Gas Procurement Charge	2,538	5,692	10,164	13,529	14,261	12,262	9,571	5,844	3,180	2,396	2,197	682	82,316
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$103,465	$153,437	$224,200	$277,791	$289,691	$257,948	$214,609	$156,111	$113,054	$101,083	$97,968	$74,855	$2,064,213
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44535
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03893
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20418
OPEB Surcredit ($/Mcf) - Rider I	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$9,870	$22,060	$39,391	$52,434	$55,268	$47,522	$37,092	$22,647	$12,325	$9,287	$8,515	$2,644	$319,055
Natural Gas Supply Charge ($/Mcf) - Rider A	115,119	249,354	445,256	592,680	624,713	537,157	419,264	255,993	139,311	104,969	96,251	29,887	3,609,954
Gas Adjustment Charge ($/Mcf) - Rider A	4,909	10,086	18,010	23,974	25,270	21,728	16,959	10,355	5,635	4,246	3,893	1,209	146,274
OPEB Surcredit - Rider I	(2,048)	(4,594)	(8,204)	(10,920)	(11,510)	(9,897)	(7,725)	(4,717)	(2,567)	(1,934)	(1,773)	(551)	(66,440)
Total Gas Cost Revenues	$127,850	$276,906	$494,453	$658,168	$693,741	$596,510	$465,590	$284,278	$154,704	$116,568	$106,886	$33,189	$4,008,843
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($176)	($261)	($381)	($472)	($492)	($439)	($365)	($265)	($192)	($172)	($167)	($127)	($3,509)
Total Revenues	$231,139	$430,082	$718,272	$935,487	$982,940	$854,019	$679,834	$440,124	$267,566	$217,479	$204,687	$107,917	$6,069,547
Unit Margin ($/Mcf)	$4.6849	$3.0972	$2.5345	$2.3592	$2.3341	$2.4171	$2.5765	$3.0695	$4.0847	$4.8471	$5.1232	$12.6069	$2.8813

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Proposed Rates)

Large Commercial SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	49	48	48	45	44	42	44	48	48	48	48	49	561
Total Volume	2,837	6,218	8,999	12,023	11,320	10,045	7,674	5,070	2,912	1,938	1,723	2,344	73,103
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$7,399	$7,248	$7,248	$6,795	$6,644	$6,342	$6,644	$7,248	$7,248	$7,248	$7,248	$7,399	$84,711
Volumetric Distribution Charge	4,715	10,336	14,958	19,984	18,817	16,697	12,756	8,427	4,840	3,221	2,863	3,896	121,512
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$12,114	$17,584	$22,206	$26,779	$25,461	$23,039	$19,400	$15,675	$12,088	$10,469	$10,111	$11,295	$206,223
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44537
OPEB Surcredit ($/Mcf) - Rider I	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09276)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$1,268	$2,769	$4,007	$5,354	$5,041	$4,473	$3,417	$2,258	$1,297	$863	$767	$1,044	$32,558
OPEB Surcredit - Rider I	(263)	(577)	(835)	(1,115)	(1,050)	(932)	(712)	(470)	(270)	(180)	(160)	(217)	(6,781)
Total Gas Cost Revenues	$1,005	$2,192	$3,172	$4,239	$3,991	$3,541	$2,705	$1,788	$1,027	$683	$607	$827	$25,777
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($21)	($30)	($38)	($46)	($43)	($39)	($33)	($27)	($21)	($18)	($17)	($19)	($352)
Total Revenues	$13,098	$19,746	$25,340	$30,972	$29,409	$26,541	$22,072	$17,436	$13,094	$11,134	$10,701	$12,103	$231,648
Unit Margin ($/Mcf)	$4.2704	$2.8278	$2.4677	$2.2274	$2.2491	$2.2935	$2.5279	$3.0918	$4.1512	$5.4023	$5.8697	$4.8187	$2.8210

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Large Commercial MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	726	723	725	727	730	725	727	728	727	722	726	730	8,716
Total Volume	94,296	176,437	297,245	392,760	426,959	374,441	315,825	209,962	122,615	79,510	72,467	78,608	2,641,126
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	109,626	109,173	109,475	109,777	110,230	109,475	109,777	109,928	109,777	109,022	109,626	110,230	1,316,116
Volumetric Distribution Charge	156,739	293,273	494,080	652,846	709,692	622,397	524,964	348,999	203,810	132,162	120,455	130,662	4,390,080
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$266,365	$402,446	$603,555	$762,623	$819,922	$731,872	$634,741	$458,927	$313,587	$241,184	$230,081	$240,892	$5,706,196
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)
Gas Cost Revenues													
MMT Gas Cost Charge	$46,205	$86,454	$145,650	$192,453	$209,210	$183,476	$154,754	$102,881	$60,081	$38,960	$35,509	$38,518	$1,294,151
OPEB Surcredit - Rider I	(11,161)	(20,883)	(35,182)	(46,487)	(50,535)	(44,319)	(37,381)	(24,851)	(14,513)	(9,411)	(8,577)	(9,304)	(312,604)
Total Gas Cost Revenues	$35,044	$65,571	$110,468	$145,966	$158,675	$139,157	$117,373	$78,030	$45,568	$29,549	$26,932	$29,214	$981,547
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($453)	($684)	($1,026)	($1,296)	($1,394)	($1,244)	($1,079)	($780)	($533)	($410)	($391)	($410)	($9,700)
Total Revenues	$300,956	$467,333	$712,997	$907,293	$977,203	$869,785	$751,035	$536,177	$358,622	$270,323	$256,622	$269,696	$6,678,043
Unit Margin ($/Mcf)	$2.8248	$2.2810	$2.0305	$1.9417	$1.9204	$1.9546	$2.0098	$2.1858	$2.5575	$3.0334	$3.1750	$3.0645	$2.1605

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Large Commercial DMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	11	11	11	11	11	11	11	11	11	11	11	11	132
Total Volume	50,901	65,881	67,309	73,313	81,879	73,457	66,268	54,419	47,325	43,823	43,997	48,110	716,683
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	1,661	19,932
Volumetric Distribution Charge	84,607	109,507	111,881	121,862	136,099	122,099	110,151	90,456	78,664	72,843	73,132	79,969	1,191,270
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$86,268	$111,168	$113,542	$123,523	$137,760	$123,760	$111,812	$92,117	$80,325	$74,504	$74,793	$81,630	$1,211,202
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)
Gas Cost Revenues													
OPEB Surcredit - Rider I	(6,025)	(7,798)	(7,967)	(8,677)	(9,691)	(8,694)	(7,844)	(6,441)	(5,601)	(5,187)	(5,207)	(5,694)	(84,826)
Total Gas Cost Revenues	($6,025)	($7,798)	($7,967)	($8,677)	($9,691)	($8,694)	($7,844)	($6,441)	($5,601)	($5,187)	($5,207)	($5,694)	($84,826)
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($147)	($189)	($193)	($210)	($234)	($210)	($190)	($157)	($137)	($127)	($127)	($139)	($2,060)
Total Revenues	$80,096	$103,181	$105,382	$114,636	$127,835	$114,856	$103,778	$85,519	$74,587	$69,190	$69,459	$75,797	$1,124,316
Unit Margin ($/Mcf)	$1.6948	$1.6874	$1.6869	$1.6849	$1.6825	$1.6848	$1.6873	$1.6927	$1.6973	$1.7001	$1.7000	$1.6967	$1.6900

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Natural Gas Vehicles	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	7	7	7	7	7	7	7	7	7	7	7	7	84
Total Volume	2,634	5,491	11,306	14,368	13,825	12,157	9,879	5,945	1,978	860	599	761	79,802
Base Non Gas Cost Rate:													
Volumetric Distribution Charge	$1.96470	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.78960	$1.79538
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Volumetric Distribution Charge	5,175	9,827	20,232	25,712	24,742	21,756	17,679	10,639	3,539	1,539	1,072	1,361	143,274
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$5,175	$9,827	$20,232	$25,712	$24,742	$21,756	$17,679	$10,639	$3,539	$1,539	$1,072	$1,361	$143,274
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44535
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03929
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20422
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$1,177	$2,445	$5,034	$6,398	$6,156	$5,414	$4,399	$2,647	$881	$383	$267	$339	$35,540
Natural Gas Supply Charge ($/Mcf) - Rider A	13,731	27,639	56,905	72,318	69,589	61,191	49,724	29,924	9,954	4,327	3,014	3,828	402,144
Gas Adjustment Charge ($/Mcf) - Rider A	586	1,118	2,302	2,925	2,815	2,475	2,011	1,210	403	175	122	155	16,297
Total Gas Cost Revenues	$15,494	$31,202	$64,241	$81,641	$78,560	$69,080	$56,134	$33,781	$11,238	$4,885	$3,403	$4,322	$453,981
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($9)	($17)	($34)	($44)	($42)	($37)	($30)	($18)	($6)	($3)	($2)	($2)	($244)
Total Revenues	$20,660	$41,012	$84,439	$107,309	$103,260	$90,799	$73,783	$44,402	$14,771	$6,421	$4,473	$5,681	$597,011
Unit Margin ($/Mcf)	$1.9647	$1.7896	$1.7896	$1.7896	$1.7896	$1.7896	$1.7896	$1.7896	$1.7896	$1.7896	$1.7896	$1.7896	$1.7954

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Small Public Authority < 250 Sales	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	379	380	397	394	378	379	379	377	375	375	370	366	4,549
Total Volume	12,926	11,616	9,485	11,059	8,591	9,079	9,132	9,029	8,660	9,205	8,217	25,040	132,038
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.02248	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02174
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$10,233	$10,260	$10,719	$10,638	$10,206	$10,233	$10,233	$10,179	$10,125	$10,125	$9,990	$9,882	$122,823
Volumetric Distribution Charge	29,723	26,709	21,809	25,429	19,754	20,876	20,997	20,760	19,913	21,166	18,894	57,578	303,608
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	291	252	205	240	186	197	198	196	188	199	178	542	2,871
Rider H - Gas Procurement Charge	1,485	1,335	1,090	1,271	987	1,043	1,049	1,037	995	1,058	944	2,877	15,171
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$41,732	$38,555	$33,823	$37,578	$31,133	$32,349	$32,477	$32,172	$31,221	$32,548	$30,006	$70,879	$444,473
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44546
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.05094
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20543
OPEB Surcredit ($/Mcf) - Rider I	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10551)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$5,777	$5,172	$4,224	$4,925	$3,826	$4,043	$4,066	$4,020	$3,856	$4,099	$3,659	$11,150	$58,817
Natural Gas Supply Charge ($/Mcf) - Rider A	67,380	58,466	47,740	55,665	43,241	45,697	45,963	45,445	43,590	46,332	41,358	126,038	666,915
Gas Adjustment Charge ($/Mcf) - Rider A	2,874	2,365	1,931	2,252	1,749	1,848	1,859	1,838	1,763	1,874	1,673	5,098	27,124
OPEB Surcredit - Rider I	(1,364)	(1,225)	(1,001)	(1,167)	(906)	(958)	(963)	(953)	(914)	(971)	(867)	(2,642)	(13,931)
Total Gas Cost Revenues	$74,667	$64,778	$52,894	$61,675	$47,910	$50,630	$50,925	$50,350	$48,295	$51,334	$45,823	$139,644	$738,925
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($71)	($66)	($57)	($64)	($53)	($55)	($55)	($55)	($53)	($55)	($51)	($120)	($755)
Total Revenues	$116,328	$103,267	$86,660	$99,189	$78,990	$82,924	$83,347	$82,467	$79,463	$83,827	$75,778	$210,403	$1,182,643
Unit Margin ($/Mcf)	$3.2284	$3.3193	$3.5661	$3.3979	$3.6240	$3.5631	$3.5566	$3.5634	$3.6051	$3.5359	$3.6518	$2.8306	$3.3663

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Small Public Authority < 250 SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	23	23	23	23	23	23	23	23	23	23	23	23	276
Total Volume	55	156	337	472	473	407	291	135	66	76	18	37	2,523
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$621	$621	$621	$621	$621	$621	$621	$621	$621	$621	$621	$621	$7,452
Volumetric Distribution Charge	125	358	774	1,086	1,087	937	669	309	153	176	40	86	5,801
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$746	$979	$1,395	$1,707	$1,708	$1,558	$1,290	$930	$774	$797	$661	$707	$13,253
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44515
OPEB Surcredit ($/Mcf) - Rider I	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10550)	($0.10584)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$24	$69	$150	$210	$210	$181	$130	$60	$30	$34	$8	$17	$1,123
OPEB Surcredit - Rider I	(6)	(16)	(36)	(50)	(50)	(43)	(31)	(14)	(7)	(8)	(2)	(4)	(267)
Total Gas Cost Revenues	$18	$53	$114	$160	$160	$138	$99	$46	$23	$26	$6	$13	$856
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($1)	($2)	($2)	($3)	($3)	($3)	($2)	($2)	($1)	($1)	($1)	($1)	($22)
Total Revenues	$763	$1,030	$1,507	$1,864	$1,865	$1,693	$1,387	$974	$796	$822	$666	$719	$14,087
Unit Margin ($/Mcf)	$13.6912	$6.2887	$4.1435	$3.6139	$3.6136	$3.8233	$4.4327	$6.9161	$11.6419	$10.4281	$37.6692	$18.9133	$5.2533

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Proposed Rates)

Small Public Authority < 250 MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	194	194	190	192	208	205	205	206	210	209	214	217	2,444
Total Volume	798	1,789	3,921	5,628	6,182	5,366	3,627	1,870	842	401	300	476	31,199
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	5,238	5,238	5,130	5,184	5,616	5,535	5,535	5,562	5,670	5,643	5,778	5,859	65,988
Volumetric Distribution Charge	1,835	4,115	9,016	12,940	14,214	12,338	8,340	4,300	1,937	921	689	1,095	71,739
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$7,073	$9,353	$14,146	$18,124	$19,830	$17,873	$13,875	$9,862	$7,607	$6,564	$6,467	$6,954	$137,727
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.48995
OPEB Surcredit ($/Mcf) - Rider I	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07788)	($0.07782)
Gas Cost Revenues													
MMT Gas Cost Charge	$391	$877	$1,921	$2,757	$3,029	$2,629	$1,777	$916	$413	$196	$147	$233	$15,286
OPEB Surcredit - Rider I	(62)	(139)	(305)	(438)	(481)	(418)	(282)	(146)	(66)	(31)	(23)	(37)	(2,428)
Total Gas Cost Revenues	$329	$738	$1,616	$2,319	$2,548	$2,211	$1,495	$770	$347	$165	$124	$196	$12,858
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($12)	($16)	($24)	($31)	($34)	($30)	($24)	($17)	($13)	($11)	($11)	($12)	($235)
Total Revenues	$7,390	$10,075	$15,738	$20,412	$22,344	$20,054	$15,346	$10,615	$7,941	$6,718	$6,580	$7,138	$150,350
Unit Margin ($/Mcf)	$8.8648	$5.2266	$3.6078	$3.2206	$3.2079	$3.3310	$3.8254	$5.2734	$9.0319	$16.3850	$21.5870	$14.6050	$4.4145

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Small Public Authority > 250 Sales	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	121	121	127	124	115	113	114	117	112	117	109	105	1,395
Total Volume	854	2,435	5,394	7,855	7,607	6,493	4,476	1,983	751	518	272	510	39,148
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.02248	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02168
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$4,477	$4,477	$4,699	$4,588	$4,255	$4,181	$4,218	$4,329	$4,144	$4,329	$4,033	$3,885	$51,615
Volumetric Distribution Charge	1,756	5,004	11,088	16,146	15,635	13,347	9,201	4,076	1,543	1,064	560	1,048	80,469
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	19	53	117	170	165	141	97	43	16	11	6	11	849
Rider H - Gas Procurement Charge	98	280	620	903	874	746	514	228	86	60	31	59	4,498
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$6,351	$9,814	$16,524	$21,806	$20,929	$18,415	$14,030	$8,676	$5,790	$5,464	$4,630	$5,002	$137,431
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44534
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03731
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20400
OPEB Surcredit ($/Mcf) - Rider I	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11761)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$382	$1,084	$2,402	$3,498	$3,387	$2,892	$1,993	$883	$334	$231	$121	$227	$17,434
Natural Gas Supply Charge ($/Mcf) - Rider A	4,454	12,254	27,152	39,536	38,287	32,684	22,530	9,982	3,779	2,606	1,371	2,566	197,201
Gas Adjustment Charge ($/Mcf) - Rider A	190	496	1,098	1,599	1,549	1,322	911	404	153	105	55	104	7,986
OPEB Surcredit - Rider I	(101)	(286)	(634)	(924)	(895)	(764)	(526)	(233)	(88)	(61)	(32)	(60)	(4,604)
Total Gas Cost Revenues	$4,925	$13,548	$30,018	$43,709	$42,328	$36,134	$24,908	$11,036	$4,178	$2,881	$1,515	$2,837	$218,017
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($11)	($17)	($28)	($37)	($36)	($31)	($24)	($15)	($10)	($9)	($8)	($9)	($235)
Total Revenues	$11,265	$23,345	$46,514	$65,478	$63,221	$54,518	$38,914	$19,697	$9,958	$8,336	$6,137	$7,830	$355,213
Unit Margin ($/Mcf)	$7.4325	$4.0310	$3.0631	$2.7762	$2.7514	$2.8359	$3.1344	$4.3750	$7.7119	$10.5522	$17.0018	$9.8140	$3.5105

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Small Public Authority > 250 SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	19	19	19	19	19	19	19	19	19	19	19	19	228
Total Volume	213	652	1,384	1,959	1,948	1,696	1,172	520	244	218	44	70	10,118
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$703	$703	$703	$703	$703	$703	$703	$703	$703	$703	$703	$703	$8,436
Volumetric Distribution Charge	438	1,340	2,844	4,027	4,003	3,487	2,408	1,068	501	449	91	143	20,798
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$1,141	$2,043	$3,547	$4,730	$4,706	$4,190	$3,111	$1,771	$1,204	$1,152	$794	$846	$29,234
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44514
OPEB Surcredit ($/Mcf) - Rider I	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11762)	($0.11771)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$95	$290	$616	$872	$867	$755	$522	$231	$108	$97	$20	$31	$4,504
OPEB Surcredit - Rider I	(25)	(77)	(163)	(230)	(229)	(200)	(138)	(61)	(29)	(26)	(5)	(8)	(1,191)
Total Gas Cost Revenues	$70	$213	$453	$642	$638	$555	$384	$170	$79	$71	$15	$23	$3,313
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($2)	($3)	($6)	($8)	($8)	($7)	($5)	($3)	($2)	($2)	($1)	($1)	($50)
Total Revenues	$1,209	$2,252	$3,994	$5,364	$5,336	$4,738	$3,490	$1,938	$1,281	$1,221	$807	$867	$32,497
Unit Margin ($/Mcf)	$5.3581	$3.1341	$2.5636	$2.4143	$2.4165	$2.4699	$2.6556	$3.4082	$4.9418	$5.2766	$18.0141	$12.1699	$2.8893

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Small Public Authority > 250 MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	205	207	199	202	212	215	213	212	218	211	218	221	2,533
Total Volume	3,054	8,334	15,338	19,989	20,856	18,274	13,499	8,054	2,879	925	726	1,067	112,995
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00000	$37.00000	$37.00000	$37.00000	$37.00000	$37.00000	$37.00000	$37.00000	$37.00000	$37.00000	$37.00000	$37.00000	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	7,585	7,659	7,363	7,474	7,844	7,955	7,881	7,844	8,066	7,807	8,066	8,177	93,721
Volumetric Distribution Charge	6,278	17,131	31,528	41,087	42,870	37,563	27,746	16,555	5,917	1,901	1,492	2,194	232,262
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$13,863	$24,790	$38,891	$48,561	$50,714	$45,518	$35,627	$24,399	$13,983	$9,708	$9,558	$10,371	$325,983
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)	($0.10683)
Gas Cost Revenues													
MMT Gas Cost Charge	$1,496	$4,084	$7,516	$9,795	$10,220	$8,954	$6,614	$3,946	$1,411	$453	$356	$523	$55,368
OPEB Surcredit - Rider I	(326)	(890)	(1,639)	(2,135)	(2,228)	(1,952)	(1,442)	(860)	(308)	(99)	(78)	(114)	(12,071)
Total Gas Cost Revenues	$1,170	$3,194	$5,877	$7,660	$7,992	$7,002	$5,172	$3,086	$1,103	$354	$278	$409	$43,297
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($24)	($42)	($66)	($83)	($86)	($77)	($61)	($41)	($24)	($17)	($16)	($18)	($555)
Total Revenues	$15,009	$27,942	$44,702	$56,138	$58,620	$52,443	$40,738	$27,444	$15,062	$10,045	$9,820	$10,762	$368,725
Unit Margin ($/Mcf)	$4.5391	$2.9745	$2.5355	$2.4294	$2.4316	$2.4908	$2.6393	$3.0294	$4.8574	$10.4983	$13.1699	$9.7175	$2.8849

National Fuel Gas Distribution Corporation
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Detailed Billed Revenue Workpapers (Proposed Rates)

Large Public Authority Sales	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	36	35	35	34	33	34	34	34	32	39	35	32	413
Total Volume	1,392	4,288	8,922	11,283	10,387	8,768	6,519	3,887	1,093	178	63	211	56,990
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.02248	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02168
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$5,436	$5,285	$5,285	$5,134	$4,983	$5,134	$5,134	$5,134	$4,832	$5,889	$5,285	$4,832	$62,363
Volumetric Distribution Charge	2,314	7,127	14,830	18,754	17,265	14,574	10,836	6,460	1,816	297	106	350	94,728
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	31	93	193	244	225	190	141	84	24	4	1	5	1,236
Rider H - Gas Procurement Charge	160	493	1,025	1,296	1,193	1,007	749	447	126	21	7	24	6,548
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$7,941	$12,998	$21,333	$25,429	$23,667	$20,905	$16,860	$12,125	$6,797	$6,210	$5,399	$5,211	$164,875
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44533
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03776
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20402
OPEB Surcredit ($/Mcf) - Rider I	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$622	$1,909	$3,973	$5,024	$4,625	$3,904	$2,903	$1,731	$487	$79	$28	$94	$25,379
Natural Gas Supply Charge ($/Mcf) - Rider A	7,255	21,582	44,907	56,789	52,282	44,131	32,814	19,562	5,500	898	320	1,061	287,101
Gas Adjustment Charge ($/Mcf) - Rider A	309	873	1,816	2,297	2,115	1,785	1,327	791	222	36	13	43	11,627
OPEB Surcredit - Rider I	(129)	(398)	(827)	(1,046)	(963)	(813)	(605)	(360)	(101)	(17)	(6)	(20)	(5,285)
Total Gas Cost Revenues	$8,057	$23,966	$49,869	$63,064	$58,059	$49,007	$36,439	$21,724	$6,108	$996	$355	$1,178	$318,822
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($13)	($22)	($36)	($43)	($40)	($36)	($29)	($21)	($12)	($11)	($9)	($9)	($281)
Total Revenues	$15,985	$36,942	$71,166	$88,450	$81,686	$69,876	$53,270	$33,828	$12,893	$7,195	$5,745	$6,380	$483,416
Unit Margin ($/Mcf)	$5.7051	$3.0313	$2.3911	$2.2538	$2.2785	$2.3843	$2.5863	$3.1197	$6.2210	$34.8011	$85.0338	$24.7171	$2.8931

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Large Public Authority SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	3	3	3	3	3	3	3	3	3	3	3	3	36
Total Volume	198	206	418	627	711	587	488	242	129	86	45	52	3,788
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$453	$453	$453	$453	$453	$453	$453	$453	$453	$453	$453	$453	$5,436
Volumetric Distribution Charge	330	343	695	1,042	1,181	976	810	403	215	142	74	86	6,297
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$783	$796	$1,148	$1,495	$1,634	$1,429	$1,263	$856	$668	$595	$527	$539	$11,733
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44507
OPEB Surcredit ($/Mcf) - Rider I	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09274)	($0.09239)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$89	$92	$186	$279	$316	$261	$217	$108	$57	$38	$20	$23	$1,686
OPEB Surcredit - Rider I	(18)	(19)	(39)	(58)	(66)	(54)	(45)	(22)	(12)	(8)	(4)	(5)	(350)
Total Gas Cost Revenues	$71	$73	$147	$221	$250	$207	$172	$86	$45	$30	$16	$18	$1,336
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.16%
Rider B - State Tax Adjustment	($1)	($1)	($2)	($3)	($3)	($2)	($2)	($1)	($1)	($1)	($1)	($1)	($19)
Total Revenues	$853	$868	$1,293	$1,713	$1,881	$1,634	$1,433	$941	$712	$624	$542	$556	$13,050
Unit Margin ($/Mcf)	$3.9462	$3.8577	$2.7448	$2.3850	$2.2998	$2.4339	$2.5913	$3.5328	$5.1715	$6.9553	$11.8039	$10.4158	$3.0972

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Large Public Authority MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	284	283	283	284	285	283	283	285	285	277	282	284	3,398
Total Volume	50,694	114,343	202,234	273,365	312,564	276,886	246,649	163,601	88,695	44,486	37,860	38,829	1,850,205
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00000	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	42,884	42,733	42,733	42,884	43,035	42,733	42,733	43,035	43,035	41,827	42,582	42,884	513,098
Volumetric Distribution Charge	84,264	190,061	336,154	454,387	519,544	460,239	409,979	271,937	147,428	73,945	62,931	64,541	3,075,410
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$127,148	$232,794	$378,887	$497,271	$562,579	$502,972	$452,712	$314,972	$190,463	$115,772	$105,513	$107,425	$3,588,508
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)
Gas Cost Revenues													
MMT Gas Cost Charge	$24,840	$56,028	$99,095	$133,949	$153,156	$135,674	$120,858	$80,164	$43,460	$21,798	$18,551	$19,026	$906,599
OPEB Surcredit - Rider I	(6,000)	(13,534)	(23,936)	(32,355)	(36,995)	(32,772)	(29,193)	(19,364)	(10,498)	(5,265)	(4,481)	(4,596)	(218,989)
Total Gas Cost Revenues	$18,840	$42,494	$75,159	$101,594	$116,161	$102,902	$91,665	$60,800	$32,962	$16,533	$14,070	$14,430	$687,610
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($216)	($396)	($644)	($845)	($956)	($855)	($770)	($535)	($324)	($197)	($179)	($183)	($6,100)
Total Revenues	$145,772	$274,892	$453,402	$598,020	$677,784	$605,019	$543,607	$375,237	$223,101	$132,108	$119,404	$121,672	$4,270,018
Unit Margin ($/Mcf)	$2.5081	$2.0359	$1.8735	$1.8191	$1.7999	$1.8165	$1.8355	$1.9252	$2.1474	$2.6024	$2.7869	$2.7666	$1.9395

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Large Public Authority DMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	3	3	3	3	3	3	3	3	3	3	3	3	36
Total Volume	10,699	20,147	22,056	26,360	25,242	27,343	19,326	14,449	3,770	7,255	15,421	11,095	203,162
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	453	453	453	453	453	453	453	453	453	453	453	453	5,436
Volumetric Distribution Charge	17,784	33,488	36,661	43,816	41,957	45,449	32,123	24,017	6,266	12,060	25,633	18,442	337,695
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$18,237	$33,941	$37,114	$44,269	$42,410	$45,902	$32,576	$24,470	$6,719	$12,513	$26,086	$18,895	$343,131
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)	($0.11836)
Gas Cost Revenues													
OPEB Surcredit - Rider I	(1,266)	(2,385)	(2,611)	(3,120)	(2,988)	(3,236)	(2,287)	(1,710)	(446)	(859)	(1,825)	(1,313)	(24,046)
Total Gas Cost Revenues	($1,266)	($2,385)	($2,611)	($3,120)	($2,988)	($3,236)	($2,287)	($1,710)	($446)	($859)	($1,825)	($1,313)	($24,046)
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($31)	($58)	($63)	($75)	($72)	($78)	($55)	($42)	($11)	($21)	($44)	($32)	($582)
Total Revenues	$16,940	$31,498	$34,440	$41,074	$39,350	$42,588	$30,234	$22,718	$6,262	$11,633	$24,217	$17,550	$318,503
Unit Margin ($/Mcf)	$1.7045	$1.6847	$1.6827	$1.6794	$1.6801	$1.6788	$1.6856	$1.6936	$1.7824	$1.7246	$1.6916	$1.7030	$1.6890

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SVIS Sales	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	120	123	126	125	126	128	129	127	125	123	122	122	1,496
Total Volume	735	2,866	8,208	11,482	12,895	9,839	6,873	3,388	1,274	620	295	586	59,062
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.02248	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02167
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$9,840	$10,086	$10,332	$10,250	$10,332	$10,496	$10,578	$10,414	$10,250	$10,086	$10,004	$10,004	$122,672
Volumetric Distribution Charge	1,522	5,939	17,008	23,792	26,721	20,389	14,243	7,021	2,640	1,285	612	1,214	122,389
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	17	62	178	249	279	213	149	73	28	13	6	13	1,280
Rider H - Gas Procurement Charge	84	329	943	1,319	1,482	1,131	790	389	146	71	34	67	6,786
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$11,463	$16,417	$28,461	$35,610	$38,814	$32,229	$25,760	$17,898	$13,064	$11,456	$10,656	$11,298	$253,127
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44531
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03563
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20380
OPEB Surcredit ($/Mcf) - Rider I	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06197)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$328	$1,276	$3,655	$5,113	$5,742	$4,382	$3,061	$1,509	$567	$276	$131	$261	$26,301
Natural Gas Supply Charge ($/Mcf) - Rider A	3,829	14,427	41,313	57,792	64,906	49,526	34,597	17,055	6,414	3,121	1,486	2,950	297,416
Gas Adjustment Charge ($/Mcf) - Rider A	163	584	1,671	2,338	2,625	2,003	1,399	690	259	126	60	119	12,037
OPEB Surcredit - Rider I	(46)	(178)	(509)	(711)	(799)	(610)	(426)	(210)	(79)	(38)	(18)	(36)	(3,660)
Total Gas Cost Revenues	$4,274	$16,109	$46,130	$64,532	$72,474	$55,301	$38,631	$19,044	$7,161	$3,485	$1,659	$3,294	$332,094
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($19)	($28)	($48)	($61)	($66)	($55)	($44)	($30)	($22)	($19)	($18)	($19)	($429)
Total Revenues	$15,718	$32,498	$74,543	$100,081	$111,222	$87,475	$64,347	$36,912	$20,203	$14,922	$12,297	$14,573	$584,792
Unit Margin ($/Mcf)	$15.6042	$5.7277	$3.4676	$3.1015	$3.0100	$3.2755	$3.7477	$5.2823	$10.2528	$18.4738	$36.0913	$19.2788	$4.2858

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SVIS SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	11	11	11	11	11	11	11	11	11	11	11	11	132
Total Volume	44	226	652	992	1,117	846	595	248	109	26	16	31	4,900
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$902	$902	$902	$902	$902	$902	$902	$902	$902	$902	$902	$902	$10,824
Volumetric Distribution Charge	91	468	1,351	2,055	2,314	1,753	1,233	514	225	55	32	64	10,155
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$993	$1,370	$2,253	$2,957	$3,216	$2,655	$2,135	$1,416	$1,127	$957	$934	$966	$20,979
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44547
OPEB Surcredit ($/Mcf) - Rider I	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06196)	($0.06183)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$20	$100	$290	$442	$497	$377	$265	$111	$48	$12	$7	$14	$2,183
OPEB Surcredit - Rider I	(3)	(14)	(40)	(61)	(69)	(52)	(37)	(15)	(7)	(2)	(1)	(2)	(303)
Total Gas Cost Revenues	$17	$86	$250	$381	$428	$325	$228	$96	$41	$10	$6	$12	$1,880
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.18%
Rider B - State Tax Adjustment	($2)	($2)	($4)	($5)	($5)	($5)	($4)	($2)	($2)	($2)	($2)	($2)	($37)
Total Revenues	$1,008	$1,454	$2,499	$3,333	$3,639	$2,975	$2,359	$1,510	$1,166	$965	$938	$976	$22,822
Unit Margin ($/Mcf)	$22.6888	$6.0703	$3.4560	$2.9817	$2.8799	$3.1386	$3.5877	$5.7062	$10.3765	$36.2870	$60.0791	$31.1541	$4.2810

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SVIS MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	60	61	66	66	65	63	59	59	63	61	62	62	747
Total Volume	614	2,230	5,435	7,850	8,423	6,279	3,978	1,917	696	314	267	322	38,326
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	4,920	5,002	5,412	5,412	5,330	5,166	4,838	4,838	5,166	5,002	5,084	5,084	61,254
Volumetric Distribution Charge	1,273	4,622	11,263	16,267	17,455	13,011	8,244	3,972	1,442	650	554	667	79,419
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$6,193	$9,624	$16,675	$21,679	$22,785	$18,177	$13,082	$8,810	$6,608	$5,652	$5,638	$5,751	$140,673
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.48998
OPEB Surcredit ($/Mcf) - Rider I	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02116)	($0.02119)
Gas Cost Revenues													
MMT Gas Cost Charge	$301	$1,093	$2,663	$3,846	$4,127	$3,077	$1,949	$939	$341	$154	$131	$158	$18,779
OPEB Surcredit - Rider I	(13)	(47)	(115)	(166)	(178)	(133)	(84)	(41)	(15)	(7)	(6)	(7)	(812)
Total Gas Cost Revenues	$288	$1,046	$2,548	$3,680	$3,949	$2,944	$1,865	$898	$326	$147	$125	$151	$17,967
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($11)	($16)	($28)	($37)	($39)	($31)	($22)	($15)	($11)	($10)	($10)	($10)	($240)
Total Revenues	$6,470	$10,654	$19,195	$25,322	$26,695	$21,090	$14,925	$9,693	$6,923	$5,789	$5,753	$5,892	$158,400
Unit Margin ($/Mcf)	$10.0809	$4.3149	$3.0679	$2.7616	$2.7050	$2.8950	$3.2883	$4.5962	$9.4959	$18.0181	$21.0988	$17.8764	$3.6704

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IVIS Sales	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	62	58	55	56	56	54	54	55	52	60	57	57	676
Total Volume	6,497	10,694	20,328	27,199	29,840	25,648	19,686	12,675	6,334	5,468	3,372	3,612	171,352
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.02248	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02166	$0.02169
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$15,624	$14,616	$13,860	$14,112	$14,112	$13,608	$13,608	$13,860	$13,104	$15,120	$14,364	$14,364	$170,352
Volumetric Distribution Charge	8,671	14,274	27,132	36,302	39,827	34,232	26,275	16,917	8,454	7,298	4,500	4,821	228,704
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	146	232	440	589	646	556	426	275	137	118	73	78	3,717
Rider H - Gas Procurement Charge	746	1,229	2,336	3,125	3,429	2,947	2,262	1,456	728	628	387	415	19,688
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$25,187	$30,350	$43,768	$54,129	$58,014	$51,343	$42,571	$32,508	$22,423	$23,164	$19,325	$19,678	$422,462
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44536
Natural Gas Supply Charge ($/Mcf) - Rider A	$5.21260	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.03340	$5.04019
Gas Adjustment Charge ($/Mcf) - Rider A	$0.22230	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20360	$0.20430
OPEB Surcredit ($/Mcf) - Rider I	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13410)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$2,903	$4,762	$9,052	$12,112	$13,288	$11,421	$8,766	$5,644	$2,821	$2,435	$1,501	$1,608	$76,313
Natural Gas Supply Charge ($/Mcf) - Rider A	33,864	53,828	102,319	136,902	150,197	129,096	99,088	63,799	31,882	27,521	16,971	18,181	863,648
Gas Adjustment Charge ($/Mcf) - Rider A	1,444	2,177	4,139	5,538	6,075	5,222	4,008	2,581	1,290	1,113	686	735	35,008
OPEB Surcredit - Rider I	(871)	(1,434)	(2,726)	(3,648)	(4,002)	(3,440)	(2,640)	(1,700)	(849)	(733)	(452)	(484)	(22,979)
Total Gas Cost Revenues	$37,340	$59,333	$112,784	$150,904	$165,558	$142,299	$109,222	$70,324	$35,144	$30,336	$18,706	$20,040	$951,990
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($43)	($52)	($74)	($92)	($99)	($87)	($72)	($55)	($38)	($39)	($33)	($33)	($717)
Total Revenues	$62,484	$89,631	$156,478	$204,941	$223,473	$193,555	$151,721	$102,777	$57,529	$53,461	$37,998	$39,685	$1,373,735
Unit Margin ($/Mcf)	$3.8770	$2.8380	$2.1531	$1.9901	$1.9442	$2.0018	$2.1625	$2.5647	$3.5400	$4.2366	$5.7313	$5.4478	$2.4655

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IVIS SATC	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	3	3	3	3	3	3	3	3	3	3	3	3	36
Total Volume	185	342	795	947	1,008	832	696	387	158	99	98	109	5,658
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$756	$756	$756	$756	$756	$756	$756	$756	$756	$756	$756	$756	$9,072
Volumetric Distribution Charge	247	457	1,061	1,264	1,345	1,111	930	516	211	132	131	146	7,551
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$1,003	$1,213	$1,817	$2,020	$2,101	$1,867	$1,686	$1,272	$967	$888	$887	$902	$16,623
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.44690	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44530	$0.44558
OPEB Surcredit ($/Mcf) - Rider I	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13411)	($0.13415)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$83	$152	$354	$422	$449	$371	$310	$172	$71	$44	$44	$49	$2,521
OPEB Surcredit - Rider I	(25)	(46)	(107)	(127)	(135)	(112)	(93)	(52)	(21)	(13)	(13)	(15)	(759)
Total Gas Cost Revenues	$58	$106	$247	$295	$314	$259	$217	$120	$50	$31	$31	$34	$1,762
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.18%
Rider B - State Tax Adjustment	($2)	($2)	($3)	($3)	($4)	($3)	($3)	($2)	($2)	($2)	($2)	($2)	($30)
Total Revenues	$1,059	$1,317	$2,061	$2,312	$2,411	$2,123	$1,900	$1,390	$1,015	$917	$916	$934	$18,355
Unit Margin ($/Mcf)	$5.4188	$3.5447	$2.2857	$2.1328	$2.0847	$2.2432	$2.4201	$3.2890	$6.1057	$8.9928	$9.0152	$8.2534	$2.9382

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IVIS MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	269	268	271	271	271	274	274	275	274	267	268	268	3,250
Total Volume	153,212	192,380	234,551	270,037	308,686	283,815	257,928	187,855	164,166	149,605	147,557	150,562	2,500,356
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	67,788	67,536	68,292	68,292	68,292	69,048	69,048	69,300	69,048	67,284	67,536	67,536	819,000
Volumetric Distribution Charge	204,492	256,769	313,056	360,419	412,004	378,808	344,257	250,731	219,112	199,678	196,945	200,956	3,337,225
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$272,280	$324,305	$381,348	$428,711	$480,296	$447,856	$413,305	$320,031	$288,160	$266,962	$264,481	$268,492	$4,156,225
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)
Gas Cost Revenues													
MMT Gas Cost Charge	$75,074	$94,266	$114,930	$132,318	$151,256	$139,069	$126,385	$92,049	$80,441	$73,307	$72,303	$73,776	$1,225,174
OPEB Surcredit - Rider I	(9,300)	(11,677)	(14,237)	(16,391)	(18,737)	(17,228)	(15,656)	(11,403)	(9,965)	(9,081)	(8,957)	(9,139)	(151,771)
Total Gas Cost Revenues	$65,774	$82,589	$100,693	$115,927	$132,519	$121,841	$110,729	$80,646	$70,476	$64,226	$63,346	$64,637	$1,073,403
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($463)	($551)	($648)	($729)	($817)	($761)	($703)	($544)	($490)	($454)	($450)	($456)	($7,066)
Total Revenues	$337,591	$406,343	$481,393	$543,909	$611,998	$568,936	$523,331	$400,133	$358,146	$330,734	$327,377	$332,673	$5,222,562
Unit Margin ($/Mcf)	$1.7771	$1.6858	$1.6259	$1.5876	$1.5559	$1.5780	$1.6024	$1.7036	$1.7553	$1.7844	$1.7924	$1.7833	$1.6623

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IVIS DMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	24	24	24	24	24	24	24	24	24	24	24	24	288
Total Volume	42,439	54,108	62,056	71,279	87,132	78,033	75,170	60,981	51,344	44,999	40,448	43,225	711,214
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	6,048	72,576
Volumetric Distribution Charge	56,643	72,218	82,826	95,136	116,295	104,151	100,330	81,391	68,528	60,060	53,986	57,692	949,257
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$62,691	$78,266	$88,874	$101,184	$122,343	$110,199	$106,378	$87,439	$74,576	$66,108	$60,034	$63,740	$1,021,833
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)	($0.06070)
Gas Cost Revenues													
OPEB Surcredit - Rider I	(2,576)	(3,284)	(3,767)	(4,327)	(5,289)	(4,737)	(4,563)	(3,702)	(3,117)	(2,731)	(2,455)	(2,624)	(43,172)
Total Gas Cost Revenues	($2,576)	($3,284)	($3,767)	($4,327)	($5,289)	($4,737)	($4,563)	($3,702)	($3,117)	($2,731)	($2,455)	($2,624)	($43,172)
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($107)	($133)	($151)	($172)	($208)	($187)	($181)	($149)	($127)	($112)	($102)	($108)	($1,737)
Total Revenues	$60,008	$74,849	$84,956	$96,685	$116,846	$105,275	$101,634	$83,588	$71,332	$63,265	$57,477	$61,008	$976,924
Unit Margin ($/Mcf)	$1.4772	$1.4465	$1.4322	$1.4195	$1.4041	$1.4122	$1.4152	$1.4339	$1.4525	$1.4691	$1.4842	$1.4746	$1.4367

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LVIS MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	7	7	7	7	7	7	7	7	7	7	7	7	84
Total Volume	33,611	36,879	41,090	42,306	43,391	41,676	44,060	38,786	39,540	34,576	33,708	38,286	467,907
Base Non Gas Cost Rate:													
Basic Service Charge	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00
Volumetric Distribution Charge	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	7,161	7,161	7,161	7,161	7,161	7,161	7,161	7,161	7,161	7,161	7,161	7,161	85,932
Volumetric Distribution Charge	34,427	37,776	42,088	43,334	44,445	42,689	45,130	39,729	40,500	35,416	34,527	39,217	479,277
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$41,588	$44,937	$49,249	$50,495	$51,606	$49,850	$52,291	$46,890	$47,661	$42,577	$41,688	$46,378	$565,209
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000
OPEB Surcredit ($/Mcf) - Rider I	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)
Gas Cost Revenues													
MMT Gas Cost Charge	$16,469	$18,071	$20,134	$20,730	$21,261	$20,421	$21,589	$19,005	$19,374	$16,942	$16,517	$18,760	$229,273
OPEB Surcredit - Rider I	(2,385)	(2,617)	(2,916)	(3,002)	(3,079)	(2,958)	(3,127)	(2,753)	(2,806)	(2,454)	(2,392)	(2,717)	(33,206)
Total Gas Cost Revenues	$14,084	$15,454	$17,218	$17,728	$18,182	$17,463	$18,462	$16,252	$16,568	$14,488	$14,125	$16,043	$196,067
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($71)	($76)	($84)	($86)	($88)	($85)	($89)	($80)	($81)	($72)	($71)	($79)	($962)
Total Revenues	$55,601	$60,315	$66,383	$68,137	$69,700	$67,228	$70,664	$63,062	$64,148	$56,993	$55,742	$62,342	$760,314
Unit Margin ($/Mcf)	$1.2374	$1.2185	$1.1986	$1.1936	$1.1893	$1.1961	$1.1868	$1.2089	$1.2054	$1.2314	$1.2367	$1.2113	$1.2080

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Detailed Billed Revenue Workpapers (Proposed Rates)

LVIS DMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	19	19	19	19	19	19	19	19	19	19	19	19	228
Total Volume	114,122	130,876	150,894	174,744	210,953	182,707	176,912	144,444	125,034	112,155	105,726	114,949	1,743,516
Base Non Gas Cost Rate:													
Basic Service Charge	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00
Volumetric Distribution Charge	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	19,437	19,437	19,437	19,437	19,437	19,437	19,437	19,437	19,437	19,437	19,437	19,437	233,244
Volumetric Distribution Charge	116,895	134,056	154,561	178,991	216,079	187,146	181,211	147,954	128,073	114,880	108,295	117,742	1,785,883
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$136,332	$153,493	$173,998	$198,428	$235,516	$206,583	$200,648	$167,391	$147,510	$134,317	$127,732	$137,179	$2,019,127
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)	($0.07097)
Gas Cost Revenues													
OPEB Surcredit - Rider I	(8,099)	(9,288)	(10,709)	(12,402)	(14,971)	(12,967)	(12,555)	(10,251)	(8,874)	(7,960)	(7,503)	(8,158)	(123,737)
Total Gas Cost Revenues	($8,099)	($9,288)	($10,709)	($12,402)	($14,971)	($12,967)	($12,555)	($10,251)	($8,874)	($7,960)	($7,503)	($8,158)	($123,737)
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($232)	($261)	($296)	($337)	($400)	($351)	($341)	($285)	($251)	($228)	($217)	($233)	($3,432)
Total Revenues	$128,001	$143,944	$162,993	$185,689	$220,145	$193,265	$187,752	$156,855	$138,385	$126,129	$120,012	$128,788	$1,891,958
Unit Margin ($/Mcf)	$1.1946	$1.1728	$1.1531	$1.1355	$1.1164	$1.1307	$1.1342	$1.1589	$1.1798	$1.1976	$1.2081	$1.1934	$1.1581

National Fuel Gas Distribution Corporation
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Detailed Billed Revenue Workpapers (Proposed Rates)

LIS MMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	1	1	1	1	1	1	1	1	1	1	1	1	12
Total Volume	26,342	30,732	29,878	28,936	33,089	28,928	32,204	26,058	28,043	29,009	28,399	28,381	349,999
Base Non Gas Cost Rate:													
Basic Service Charge	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00
Volumetric Distribution Charge	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	13,980
Volumetric Distribution Charge	15,787	18,418	17,906	17,341	19,830	17,337	19,300	15,616	16,806	17,385	17,019	17,009	209,754
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$16,952	$19,583	$19,071	$18,506	$20,995	$18,502	$20,465	$16,781	$17,971	$18,550	$18,184	$18,174	$223,734
Gas Cost Rates:													
MMT Gas Cost Charge	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49000	$0.49001
OPEB Surcredit ($/Mcf) - Rider I	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)
Gas Cost Revenues													
MMT Gas Cost Charge	$12,908	$15,059	$14,640	$14,179	$16,214	$14,175	$15,780	$12,768	$13,741	$14,215	$13,915	$13,907	$171,501
OPEB Surcredit - Rider I	(363)	(423)	(411)	(398)	(456)	(398)	(443)	(359)	(386)	(399)	(391)	(391)	(4,818)
Total Gas Cost Revenues	$12,545	$14,636	$14,229	$13,781	$15,758	$13,777	$15,337	$12,409	$13,355	$13,816	$13,524	$13,516	$166,683
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($29)	($33)	($32)	($31)	($36)	($31)	($35)	($29)	($31)	($32)	($31)	($31)	($381)
Total Revenues	$29,468	$34,186	$33,268	$32,256	$36,717	$32,248	$35,767	$29,161	$31,295	$32,334	$31,677	$31,659	$390,036
Unit Margin ($/Mcf)	$0.6435	$0.6372	$0.6383	$0.6396	$0.6345	$0.6396	$0.6355	$0.6440	$0.6408	$0.6395	$0.6403	$0.6403	$0.6392

National Fuel Gas Distribution Corporation
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Detailed Billed Revenue Workpapers (Proposed Rates)

LIS DMT	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	9	9	9	9	9	9	9	9	9	9	9	9	108
Total Volume	204,103	246,691	280,271	339,344	379,438	351,214	341,685	257,124	211,848	208,813	202,412	207,612	3,230,556
Base Non Gas Cost Rate:													
Basic Service Charge	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00
Volumetric Distribution Charge	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	10,485	10,485	10,485	10,485	10,485	10,485	10,485	10,485	10,485	10,485	10,485	10,485	125,820
Volumetric Distribution Charge	122,319	147,842	167,966	203,369	227,397	210,483	204,772	154,095	126,961	125,142	121,305	124,422	1,936,072
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$132,804	$158,327	$178,451	$213,854	$237,882	$220,968	$215,257	$164,580	$137,446	$135,627	$131,790	$134,907	$2,061,892
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)
Gas Cost Revenues													
OPEB Surcredit - Rider I	(2,810)	(3,397)	(3,859)	(4,673)	(5,225)	(4,836)	(4,705)	(3,541)	(2,917)	(2,875)	(2,787)	(2,859)	(44,484)
Total Gas Cost Revenues	($2,810)	($3,397)	($3,859)	($4,673)	($5,225)	($4,836)	($4,705)	($3,541)	($2,917)	($2,875)	($2,787)	($2,859)	($44,484)
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($226)	($269)	($303)	($364)	($404)	($376)	($366)	($280)	($234)	($231)	($224)	($229)	($3,506)
Total Revenues	$129,768	$154,661	$174,289	$208,817	$232,253	$215,756	$210,186	$160,759	$134,295	$132,521	$128,779	$131,819	$2,013,902
Unit Margin ($/Mcf)	$0.6507	$0.6418	$0.6367	$0.6302	$0.6269	$0.6292	$0.6300	$0.6401	$0.6488	$0.6495	$0.6511	$0.6498	$0.6382

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Detailed Billed Revenue Workpapers (Proposed Rates)

LIS DMT Negotiated	Oct 25	Nov 25	Dec 25	Jan 26	Feb 26	Mar 26	Apr 26	May 26	Jun 26	Jul 26	Aug 26	Sep 26	Total
Customers	10	10	10	10	10	10	10	10	10	10	10	10	120
Total Volume	671,603	677,098	741,856	799,412	836,647	805,751	793,497	702,958	666,452	651,062	624,819	664,831	8,635,986
Base Non Gas Cost Rate:													
Basic Service Charge	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00
Volumetric Distribution Charge	$0.31170	$0.30460	$0.28260	$0.27920	$0.28270	$0.28230	$0.28430	$0.29050	$0.29290	$0.32130	$0.32520	$0.32270	$0.29694
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	139,800
Volumetric Distribution Charge	209,339	206,244	209,649	223,196	236,520	227,463	225,591	204,209	195,204	209,186	203,191	214,541	2,564,333
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$220,989	$217,894	$221,299	$234,846	$248,170	$239,113	$237,241	$215,859	$206,854	$220,836	$214,841	$226,191	$2,704,133
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)	($0.01377)
Gas Cost Revenues													
OPEB Surcredit - Rider I	(9,248)	(9,324)	(10,215)	(11,008)	(11,521)	(11,095)	(10,926)	(9,680)	(9,177)	(8,965)	(8,604)	(9,155)	(118,918)
Total Gas Cost Revenues	($9,248)	($9,324)	($10,215)	($11,008)	($11,521)	($11,095)	($10,926)	($9,680)	($9,177)	($8,965)	($8,604)	($9,155)	($118,918)
Rider B - State Tax Adjustment %	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%	-0.17%
Rider B - State Tax Adjustment	($376)	($370)	($376)	($399)	($422)	($406)	($403)	($367)	($352)	($375)	($365)	($385)	($4,596)
Total Revenues	$211,365	$208,200	$210,708	$223,439	$236,227	$227,612	$225,912	$205,812	$197,325	$211,496	$205,872	$216,651	$2,580,619
Unit Margin ($/Mcf)	$0.3290	$0.3218	$0.2983	$0.2938	$0.2966	$0.2968	$0.2990	$0.3071	$0.3104	$0.3392	$0.3438	$0.3402	$0.3131

National Fuel Gas Distribution Corporation
Pennsylvania Division
Future Test Year Ended September 30, 2026
Forfeited Discounts (Proposed Rates)

	Revenues							Forfeited
	Residential	Commercial	Public Authority	Industrial	Transportation	Total	Factor	Discounts
10/31/2025	7,451,855	1,049,718	143,577	78,203	2,127,854	10,851,208	0.71120%	77,174
11/30/2025	13,706,085	2,013,236	163,554	122,129	2,949,536	18,954,539	0.49120%	93,105
12/31/2025	23,084,753	3,470,314	204,341	231,021	4,040,786	31,031,215	0.31277%	97,058
1/31/2026	28,728,527	4,392,982	253,116	305,022	4,878,033	38,557,681	0.37254%	143,642
2/28/2026	28,602,219	4,427,892	223,897	334,696	5,203,425	38,792,128	0.39280%	152,375
3/31/2026	25,215,391	3,880,593	207,318	281,030	4,700,074	34,284,405	0.39633%	135,880
4/30/2026	19,710,116	3,035,840	175,532	216,068	4,124,458	27,262,014	0.39253%	107,011
5/31/2026	13,243,397	1,992,191	135,992	139,689	3,087,630	18,598,899	0.54181%	100,771
6/30/2026	6,951,313	1,030,831	102,314	77,733	2,273,537	10,435,728	0.74794%	78,053
7/31/2026	4,742,788	706,784	99,358	68,383	1,932,619	7,549,932	0.78040%	58,920
8/31/2026	4,476,454	659,695	87,660	50,295	1,880,136	7,154,240	0.94003%	67,252
9/30/2026	4,852,192	608,570	224,614	54,259	1,957,558	7,697,193	0.88512%	68,129
Total	$ 180,765,090	$ 27,268,646	$ 2,021,272	$ 1,958,527	$ 39,155,646	$ 251,169,181	0.46955%	$1,179,370

NATIONAL FUEL EXHIBIT CTM-5

HISTORIC TEST YEAR

CURRENT RATES

National Fuel Gas Distribution Corporation
Pennsylvania Division
Historic Test Year Ended September 30, 2025
Summary of Revenues (Current Rates)

	Account	Total Revenue	Total Gas Cost	Total Delivery
Gas Sales				
Residential	480	160,933,865	74,552,437	86,381,428
Commercial/Public Authority	481	26,928,940	14,768,549	12,160,391
Industrial	481	1,950,308	1,209,949	740,359
Subtotal		189,813,114	90,530,936	99,282,178
Transportation				
Residential	489	9,617,413	521,060	9,096,353
Commercial/Public Authority	489	18,082,482	3,218,774	14,863,708
Industrial	489	14,967,819	2,466,943	12,500,876
Subtotal		42,667,713	6,206,777	36,460,936
Total Billed Revenue		232,480,827	96,737,713	135,743,114
Unbilled				
Gas Revenue	480/481	493,304	527,763	(34,459)
Transportation Revenue	489	(86,187)	0	(86,187)
Total Unbilled Revenue		407,117	527,763	(120,646)
Miscellaneous	48X	435,277	0	435,277
Other Operating Revenues				
Forfeited Discounts	487	1,145,810	0	1,145,810
Rent From Gas Property	493	100,267	0	100,267
Other Gas Revenues	495	216,854	0	216,854
Subtotal		1,462,930	0	1,462,930
Total Operating Revenue		234,786,150	97,265,476	137,520,675

National Fuel Gas Distribution Corporation
Pennsylvania Division
Historic Test Year Ended September 30, 2025
Summary of Revenues (Current Rates)

	Account	Reference (CTM-7, Sch. 4)	Average Customers	Total Usage (Mcf)	Total Revenue	Total Gas Cost	Total Delivery
Residential Sales	480	Page 1	172,195	16,434,223	156,787,920	71,853,991	84,933,929
Residential CAP	480	Page 2	5,828	616,984	4,145,945	2,698,446	1,447,499
Residential SATC	489	Page 3	18,045	1,743,073	9,102,052	448,170	8,653,882
Residential MMT	489	Page 4	498	110,883	515,361	72,890	442,471
Total Residential			196,566	18,905,164	170,551,278	75,073,497	95,477,781
SCPA < 250 Sales	481	Page 5	8,578	973,094	9,640,002	4,391,223	5,248,779
SCPA < 250 SATC	489	Page 6	730	91,298	492,131	35,916	456,215
SCPA < 250 MMT	489	Page 7	1,152	164,079	856,208	89,043	767,166
SCPA > 250 Sales	481	Page 8	2,720	1,346,728	10,280,348	6,021,429	4,258,919
SCPA > 250 SATC	489	Page 9	313	158,306	529,158	52,477	476,681
SCPA > 250 MMT	489	Page 10	1,248	736,699	2,515,627	389,375	2,126,252
LCPA	481	Page 11	452	884,151	6,395,558	3,983,043	2,412,515
LCPA SATC	489	Page 12	46	86,717	259,715	30,574	229,142
LCPA MMT	489	Page 13	988	4,469,750	11,883,510	2,608,022	9,275,489
LCPA DMT	489	Page 14	13	903,240	1,546,131	13,368	1,532,763
Natural Gas Vechicles	481	Page 15	7	108,656	613,032	372,854	240,178
Total Commercial & Public Authority			16,247	9,922,718	45,011,422	17,987,323	27,024,099
SVIS Sales	481	Page 16	126	62,396	543,975	281,427	262,548
SVIS SATC	489	Page 17	11	3,762	19,935	1,577	18,357
SVIS MMT	489	Page 18	64	45,129	179,704	23,823	155,881
IVIS Sales	481	Page 19	55	210,506	1,406,333	928,522	477,811
IVIS SATC	489	Page 20	3	6,665	20,539	1,950	18,589
IVIS MMT	489	Page 21	263	2,209,460	4,626,798	981,328	3,645,470
IVIS DMT	489	Page 22	25	714,082	1,113,840	80,457	1,033,383
LVIS MMT	489	Page 23	8	492,363	809,853	214,767	595,086
LVIS DMT	489	Page 24	20	1,828,242	2,286,380	156,457	2,129,923
LIS MMT	489	Page 25	1	365,892	406,655	171,154	235,502
LIS DMT	489	Page 26	10	3,418,371	2,406,661	216,486	2,190,175
LIS DMT Negotiated	489	Page 27	10	7,750,120	3,097,454	618,944	2,478,510
Total Industrial			594	17,106,989	16,918,127	3,676,892	13,241,234
Grand Total			**213,407**	**45,934,870**	**232,480,827**	**96,737,713**	**135,743,114**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Historic Test Year Ended September 30, 2025
Billed Delivery Revenues by Rate Type (Current Rates)

	Account	Reference (CTM-5, Sch. 4)	Basic Service Charge	Distribution Charge	Rounding	Rider B	DSIC	Rider E	Rider F	Rider G	Rider H	Weather Norm	Bypass Service	Total Delivery
Residential Sales	480	Page 1	28,978,236	48,519,899	(1,958)	(75,870)	521,816	0	2,196,120	1,219,915	1,882,045	1,693,725	0	84,933,929
Residential CAP	480	Page 2	986,760	1,820,873	7	(2,689)	18,123	0	(1,561,395)	45,689	70,631	69,499	0	1,447,499
Residential SATC	489	Page 3	3,033,804	5,146,001	(69)	(8,015)	55,862	0	248,292	3.340	4.230	177,999	0	8,653,882
Residential MMT	489	Page 4	83,863	328,335	(1)	(457)	2,631	0	15,781	0	0	12,317	0	442,471
Total Residential			33,082,663	55,815,109	(2,021)	(87,031)	598,433	0	898,799	1,265,607	1,952,680	1,953,541	0	95,477,781
SCPA < 250 Sales	481	Page 5	2,780,795	2,238,220	(129)	(4,843)	35,928	0	0	13,612	111,815	73,382	0	5,248,779
SCPA < 250 SATC	489	Page 6	236,523	209,949	(7)	(432)	3,054	0	0	0	0	7,128	0	456,215
SCPA < 250 MMT	489	Page 7	373,230	377,321	(5)	(752)	5,244	0	0	0	0	12,127	0	767,166
SCPA > 250 Sales	481	Page 8	1,207,770	2,769,972	(31)	(3,996)	26,942	(0)	0	18,915	154,836	84,510	0	4,258,919
SCPA > 250 SATC	489	Page 9	138,599	325,398	(2)	(465)	3,151	0	0	0	0	10,000	0	476,681
SCPA > 250 MMT	489	Page 10	553,886	1,514,249	(10)	(2,218)	14,253	0	0	0	0	46,093	0	2,126,252
LCPA	481	Page 11	812,172	1,469,662	(2)	(2,285)	15,992	0	0	12,458	101,590	0	2,928	2,412,515
LCPA SATC	489	Page 12	83,669	144,141	(0)	(227)	1,559	0	0	0	0	0	0	229,142
LCPA MMT	489	Page 13	1,795,106	7,429,402	(3)	(10,346)	61,329	0	0	0	0	0	0	9,275,489
LCPA DMT	489	Page 14	24,311	1,501,365	0	(1,242)	8,250	0	0	8	71	0	0	1,532,763
Natural Gas Vehicles	481	Page 15	0	236,291	(0)	(458)	4,345	0	0	0	0	0	0	240,178
Total Commercial & Public Authority			8,006,062	18,215,969	(190)	(27,264)	180,048	(0)	0	44,993	368,313	233,241	2,928	27,024,099
SVIS Sales	481	Page 16	123,794	129,298	1	(247)	1,667	0	0	867	7,169	0	0	262,548
SVIS SATC	489	Page 17	10,447	7,796	(0)	(18)	132	0	0	0	0	0	0	18,357
SVIS MMT	489	Page 18	61,584	93,516	(1)	(157)	938	0	0	0	0	0	0	155,881
IVIS Sales	481	Page 19	167,290	280,962	(3)	(442)	2,876	0	0	2,941	24,187	0	0	477,811
IVIS SATC	489	Page 20	9,594	8,896	(0)	(18)	117	0	0	0	0	0	0	18,589
IVIS MMT	489	Page 21	802,908	2,820,095	0	(3,955)	26,422	0	0	0	0	0	0	3,645,470
IVIS DMT	489	Page 22	75,088	953,086	(0)	(864)	6,055	0	0	2	17	0	0	1,033,383
LVIS MMT	489	Page 23	85,932	504,327	0	(684)	5,511	0	0	0	0	0	0	595,086
LVIS DMT	489	Page 24	246,543	1,872,669	(0)	(1,739)	12,180	0	0	32	238	0	0	2,129,923
LIS MMT	489	Page 25	13,980	219,279	0	(336)	2,578	0	0	0	0	0	0	235,502
LIS DMT	489	Page 26	132,810	2,046,477	(0)	(1,836)	12,548	0	0	20	156	0	0	2,190,175
LIS DMT Negotiated	489	Page 27	139,800	2,336,285	(0)	(2,000)	3,965	0	0	47	413	0	0	2,478,510
Total Industrial			1,869,771	11,272,685	(2)	(12,296)	74,989	0	0	3,909	32,179	0	0	13,241,234
Grand Total			**42,958,496**	**85,303,763**	**(2,213)**	**(126,591)**	**853,470**	**(0)**	**898,799**	**1,314,509**	**2,353,172**	**2,186,781**	**2,928**	**135,743,114**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Residential Sales Service													
Customers	172,198	172,172	172,832	173,303	173,146	173,231	172,969	172,212	171,733	171,229	170,732	170,588	2,066,341
Total Volume	474,764	950,578	2,257,339	3,112,952	3,187,737	2,523,770	1,727,148	942,595	517,454	178,483	247,548	313,857	16,434,223
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$2,380,940	$2,404,719	$2,468,273	$2,489,303	$2,410,566	$2,407,336	$2,424,149	$2,429,650	$2,486,356	$2,302,849	$2,394,095	$2,380,000	$28,978,236
All Mcf	$1,318,411	$2,783,403	$6,673,752	$9,218,321	$9,437,752	$7,473,765	$5,114,454	$2,791,532	$1,532,330	$528,532	$716,712	$930,935	$48,519,899
Revenue Rounding	$1,157	($199)	($1,317)	($1,461)	$179	$77	$99	$321	($355)	($197)	($499)	$236	($1,958)
Rider B - State Tax Adjustment	($1,925)	($5,788)	($9,071)	($11,473)	($11,645)	($10,283)	($7,942)	($5,125)	($3,842)	($2,758)	($2,770)	($3,248)	($75,870)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider F - CAP Discount Charge	$66,278	$130,483	$287,131	$396,559	$456,869	$402,846	$275,586	$144,819	$75,638	$26,063	$34,915	$45,311	$2,342,496
Rider G - Merchant Function Charge	$29,180	$63,054	$155,777	$215,117	$236,502	$200,026	$136,913	$74,662	$41,034	$14,188	$22,247	$31,217	$1,219,915
Rider H - Gas Procurement Charge	$50,996	$107,944	$258,920	$357,658	$366,180	$289,955	$198,471	$108,294	$59,435	$20,455	$27,639	$36,097	$1,882,045
CAP Discounts	($63,820)	($16,071)	($21,893)	($11,966)	($415)	$473	($949)	($1,679)	($2,528)	($9,968)	($9,382)	($8,179)	($146,376)
DSIC - Distribution System Improvement Charge	$0	$0	$13	$47,818	$52,942	$47,067	$88,052	$57,171	$43,139	$58,457	$61,419	$65,738	$521,816
Weather Normalization Adjustment	$271,418	$824,145	$80,969	($187,001)	($233,145)	$447,173	$458,631	$36,644	($2,534)	($339)	($1,380)	($855)	$1,693,725
Total Base Non Gas Cost Rate Revenue	$4,052,635	$6,291,689	$9,892,554	$12,512,875	$12,715,785	$11,258,435	$8,687,464	$5,636,289	$4,228,671	$2,937,283	$3,242,995	$3,477,254	$84,933,929
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$1,947,028	$4,163,848	$10,135,323	$13,999,179	$15,235,607	$12,774,481	$8,741,185	$4,768,140	$2,618,221	$903,010	$1,251,534	$1,647,405	$78,184,961
Rider A - Distribution Charge	$152,472	$322,794	$775,241	$1,070,848	$1,113,063	$894,266	$611,785	$333,926	$183,384	$63,329	$97,771	$136,919	$5,755,798
Rider A - Gas Adjustment Charge	($327,130)	($648,909)	($1,444,178)	($1,995,975)	($2,043,546)	($1,618,547)	($1,106,785)	($604,562)	($331,642)	($114,492)	($20,820)	$87,680	($10,168,905)
Rider F - Reconcilation	($4,073)	($8,266)	($20,034)	($28,052)	($35,943)	($33,945)	($23,346)	($12,718)	($6,885)	($2,282)	($3,162)	($4,133)	($182,840)
Rider I - OPEB Surcredit	($97,060)	($208,474)	($499,881)	($690,474)	($706,747)	($559,812)	($383,098)	($209,106)	($114,767)	($39,561)	($53,609)	($69,708)	($3,632,296)
Tax Cuts & Jobs Act Refund	$34,520	$110,828	$263,179	$363,615	$372,951	$294,504	$201,141	$109,847	$60,420	$20,953	$28,464	$36,851	$1,897,274
Total Gas Cost Revenues	$1,705,758	$3,731,821	$9,209,650	$12,719,155	$13,935,371	$11,750,947	$8,040,883	$4,385,527	$2,408,731	$830,956	$1,300,179	$1,835,013	$71,853,991
Total Revenues	$5,758,392	$10,023,510	$19,102,204	$25,232,030	$26,651,156	$23,009,382	$16,728,347	$10,021,816	$6,637,402	$3,768,239	$4,543,174	$5,312,268	$156,787,920

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Residential CAP													
Customers	5,791	5,931	5,920	5,925	5,975	5,971	5,928	5,839	5,708	5,614	5,649	5,685	69,934
Total Volume	17,084	36,401	84,555	116,311	119,527	95,709	64,417	35,414	22,197	5,946	8,889	10,533	616,984
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$80,054	$82,799	$84,894	$85,897	$83,545	$82,989	$83,683	$82,324	$84,275	$76,546	$79,907	$79,846	$986,760
All Mcf	$46,321	$106,852	$250,109	$344,402	$353,889	$283,473	$190,770	$104,889	$65,691	$17,597	$25,441	$31,439	$1,820,873
Revenue Rounding	$37	$6	$3	($4)	$0	$0	$3	$2	($10)	($7)	($31)	$8	$7
Rider B - State Tax Adjustment	($64)	($210)	($323)	($410)	($415)	($367)	($283)	($182)	($144)	($89)	($94)	($108)	($2,689)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$1,025	$2,421	$5,826	$8,037	$8,826	$7,585	$5,108	$2,808	$1,753	$471	$778	$1,051	$45,689
Rider H - Gas Procurement Charge	$1,793	$4,144	$9,702	$13,363	$13,731	$10,998	$7,402	$4,069	$2,548	$681	$982	$1,219	$70,631
CAP Discounts	$102,892	($45,333)	($363,565)	($582,554)	($619,918)	($494,173)	($252,195)	($13,825)	$104,605	$206,856	$215,454	$180,361	($1,561,395)
DSIC - Distribution System Improvement Charge	$0	$0	$0	$1,727	$1,887	$1,686	$3,155	$2,015	$1,537	$1,909	$2,030	$2,175	$18,123
Weather Normalization Adjustment	$12,602	$32,436	$4,024	($6,487)	($9,100)	$14,954	$19,112	$1,943	$68	($29)	$5	($29)	$69,499
Total Base Non Gas Cost Rate Revenue	$244,660	$183,114	($9,329)	($136,029)	($167,554)	($92,856)	$56,757	$184,042	$260,323	$303,936	$324,473	$295,962	$1,447,499
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$68,412	$159,802	$379,486	$523,014	$569,151	$484,498	$326,160	$179,209	$111,763	$29,977	$44,179	$55,602	$2,931,253
Rider A - Distribution Charge	$5,355	$12,390	$29,050	$40,007	$41,701	$33,921	$22,823	$12,546	$7,848	$2,107	$3,433	$4,609	$215,790
Rider A - Gas Adjustment Charge	($11,455)	($24,950)	($54,201)	($74,557)	($76,719)	($61,421)	($41,284)	($22,685)	($14,141)	($3,817)	($1,152)	$2,808	($383,573)
Rider I - OPEB Surcredit	($3,413)	($8,003)	($18,731)	($25,797)	($26,497)	($21,238)	($14,292)	($7,858)	($4,921)	($1,317)	($1,903)	($2,354)	($136,324)
Tax Cuts & Jobs Act Refund	$1,227	$4,227	$9,914	$13,589	$13,988	$11,185	$7,519	$4,135	$2,571	$695	$1,005	$1,244	$71,300
Total Gas Cost Revenues	$60,126	$143,466	$345,519	$476,257	$521,625	$446,944	$300,926	$165,348	$103,120	$27,645	$45,563	$61,908	$2,698,446
Total Revenues	$304,786	$326,580	$336,190	$340,227	$354,070	$354,088	$357,683	$349,390	$363,443	$331,580	$370,035	$357,870	$4,145,945

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Residential SATC													
Customers	17,176	17,380	17,598	17,894	18,150	18,295	18,332	18,340	18,376	18,351	18,300	18,346	216,535
Total Volume	47,391	96,500	233,847	326,337	340,707	271,963	187,546	101,189	58,460	18,577	26,700	33,856	1,743,073
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$237,533	$241,961	$250,835	$256,458	$252,440	$253,699	$256,803	$258,203	$266,012	$247,201	$256,621	$256,037	$3,033,804
All Mcf	$131,552	$282,512	$691,255	$966,363	$1,008,872	$805,366	$555,323	$299,426	$172,567	$54,933	$77,497	$100,334	$5,146,001
Revenue Rounding	$61	$9	($103)	($107)	$29	$6	$2	$52	($4)	($8)	($41)	$36	($69)
Rider B - State Tax Adjustment	($190)	($583)	($935)	($1,199)	($1,239)	($1,102)	($854)	($549)	($420)	($295)	($298)	($352)	($8,015)
Rider G - Merchant Function Charge	$0	$0	$0	$0	$0	$2	$0	$0	$0	$0	$1.480	$0	$3
Rider H - Gas Procurement Charge	$0	$0	$0	$0	$0	$2	$0	$0	$0	$0	$2	$0	$4
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider F - CAP Discount Charge	$6,598	$13,269	$29,739	$41,560	$48,769	$43,401	$29,908	$15,544	$8,522	$2,704	$3,778	$4,885	$248,676
CAP Discounts	($63)	($137)	$81	$0	$0	($26)	$0	$0	($238)	$0	$37	($37)	($383)
DSIC - Distribution System Improvement Charge	$0	$0	$1	$5,004	$5,633	$5,046	$9,458	$6,116	$4,707	$6,236	$6,597	$7,064	$55,862
Weather Normalization Adjustment	$27,987	$84,028	$9,546	($19,195)	($24,907)	$46,653	$50,186	$4,502	($429)	($122)	($168)	($80)	$177,999
Total Base Non Gas Cost Rate Revenue	$403,477	$621,058	$980,420	$1,248,884	$1,289,598	$1,153,048	$900,827	$583,293	$450,716	$310,649	$344,025	$367,887	$8,653,882
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$967	$2,156	$5,536	$7,739	$8,040	$6,559	$4,460	$2,403	$1,378	$432	$543	$514	$40,725
Rider A - Distribution Charge	$15,208	$32,757	$80,292	$112,257	$118,959	$96,366	$66,430	$35,820	$20,651	$6,584	$10,534	$14,734	$610,591
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider F - Reconcilation	($423)	($879)	($2,102)	($2,966)	($3,829)	($3,650)	($2,534)	($1,364)	($771)	($234)	($280)	($446)	($19,478)
Rider I - OPEB Surcredit	($9,683)	($21,155)	($51,766)	($72,380)	($75,535)	($60,320)	($41,598)	($22,428)	($12,925)	($4,111)	($5,797)	($7,514)	($385,212)
Tax Cuts & Jobs Act Refund	$3,501	$11,312	$27,289	$38,136	$39,868	$31,761	$21,849	$11,783	$6,819	$2,172	$3,082	$3,972	$201,543
Total Gas Cost Revenues	$9,569	$24,191	$59,249	$82,787	$87,502	$70,715	$48,608	$26,214	$15,152	$4,842	$8,081	$11,259	$448,170
Total Revenues	$413,046	$645,249	$1,039,669	$1,331,671	$1,377,100	$1,223,763	$949,435	$609,507	$465,868	$315,491	$352,107	$379,146	$9,102,052

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Residential MMT													
Customers	503	498	497	492	494	493	498	504	502	502	498	498	5,977
Total Volume	2,187	6,042	14,375	20,717	23,399	19,008	12,746	6,606	3,690	130	860	1,124	110,883
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$6,990	$6,965	$7,004	$7,467	$6,677	$6,943	$6,915	$7,149	$7,077	$6,841	$7,003	$6,833	$83,863
All Volume	$6,477	$17,890	$42,565	$61,346	$69,285	$56,285	$37,743	$19,561	$10,926	$383	$2,547	$3,328	$328,335
Revenue Rounding	$0	($0)	($0)	($0)	$0	$0	$0	$0	$0	($1)	($0)	$0	($1)
Rider B - State Tax Adjustment	($8)	($32)	($56)	($76)	($83)	($73)	($54)	($30)	($19)	($7)	($10)	($10)	($457)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider F - CAP Discount Charge	$324	$854	$1,828	$2,635	$3,236	$3,010	$2,029	$1,025	$537	$17	$125	$162	$15,781
DSIC - Distribution System Improvement Charge	$0	$0	$0	$255	$377	$326	$513	$341	$207	$178	$209	$224	$2,631
Weather Normalization Adjustment	$1,656	$5,367	$2,190	($806)	($2,640)	$2,195	$4,233	$611	($449)	$6	($31)	($13)	$12,317
Total Base Non Gas Cost Rate Revenue	$15,439	$31,044	$53,530	$70,821	$76,853	$68,686	$51,380	$28,657	$18,279	$7,417	$9,842	$10,524	$442,471
Gas Cost Revenues:													
MMT Gas Cost Charge	$1,028	$2,840	$6,756	$9,737	$10,998	$8,934	$5,991	$3,105	$1,735	$61	$417	$558	$52,159
Rider F - Reconcilation	($21)	($56)	($134)	($193)	($249)	($249)	($168)	($87)	($49)	($1)	($11)	($15)	($1,233)
Rider I - OPEB Surcredit	($176)	($408)	($970)	($1,399)	($1,580)	($1,284)	($861)	($446)	($249)	($9)	($58)	($76)	($7,517)
Tax Cuts & Jobs Act Refund	$108	$502	$1,198	$1,724	$1,948	$1,583	$1,061	$550	$307	$11	$71	$93	$9,156
Priority Standby	$486	$1,278	$2,396	$3,914	$3,890	$3,094	$2,115	$1,484	$537	$332	$369	$428	$20,324
Total Gas Cost Revenues	$1,425	$4,156	$9,246	$13,784	$15,006	$12,078	$8,139	$4,606	$2,281	$394	$788	$988	$72,890
Total Revenues	$16,864	$35,200	$62,777	$84,605	$91,859	$80,764	$59,519	$33,262	$20,560	$7,810	$10,630	$11,512	$515,361

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
SCPA < 250 Sales													
Customers	8,357	8,395	8,505	8,578	8,624	8,794	8,766	8,711	8,588	8,562	8,535	8,526	102,937
Total Volume	16,814	45,596	126,666	193,852	222,232	174,102	108,318	49,126	14,535	1,951	7,340	12,563	973,094
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$210,658	$226,048	$233,082	$238,602	$230,448	$235,746	$237,911	$242,792	$235,215	$224,274	$229,374	$236,645	$2,780,795
All Mcf	$38,667	$104,863	$291,283	$445,770	$511,035	$400,359	$249,094	$113,141	$33,432	$4,485	$17,198	$28,892	$2,238,220
Revenue Rounding	($8)	$6	($12)	($9)	($27)	($5)	($14)	($21)	($16)	($2)	($17)	($7)	($129)
Rider B - State Tax Adjustment	($116)	($346)	($520)	($676)	($736)	($660)	($503)	($343)	($254)	($222)	($215)	($253)	($4,843)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$209	$580	$1,648	$2,519	$3,094	$2,594	$1,615	$735	$223	$36	$129	$229	$13,612
Rider H - Gas Procurement Charge	$1,930	$5,238	$14,553	$22,273	$25,531	$19,996	$12,456	$5,651	$1,668	$219	$857	$1,442	$111,815
DSIC - Distribution System Improvement Charge	$0	$0	$1	$2,847	$3,345	$3,021	$5,579	$3,803	$2,793	$4,650	$4,745	$5,146	$35,928
Weather Normalization Adjustment	$9,547	$33,501	$3,118	($8,812)	($13,283)	$24,418	$24,622	$927	($604)	($7)	($2)	($43)	$73,382
Total Base Non Gas Cost Rate Revenue	$260,888	$369,892	$543,153	$702,514	$759,407	$685,469	$530,760	$366,685	$272,457	$233,433	$252,069	$272,051	$5,248,779
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$73,571	$201,925	$569,834	$871,727	$1,060,162	$880,488	$548,148	$248,680	$73,598	$9,849	$38,766	$65,872	$4,642,621
Rider A - Distribution Charge	$5,769	$15,656	$43,573	$66,691	$77,572	$61,687	$38,374	$17,425	$5,154	$699	$3,068	$5,485	$341,154
Rider A - Gas Adjustment Charge	($12,349)	($31,517)	($81,152)	($124,427)	($142,598)	($111,591)	($69,581)	($31,551)	($9,317)	($1,244)	($95)	$3,693	($611,729)
Rider I - OPEB Surcredit	($1,767)	($4,829)	($13,413)	($20,523)	($23,523)	($18,434)	($11,469)	($5,210)	($1,537)	($200)	($788)	($1,328)	($103,021)
Tax Cuts & Jobs Act Refund	$1,625	$5,788	$15,962	$24,431	$27,999	$21,938	$13,635	$6,204	$1,836	$249	$946	$1,587	$122,201
DMT Standby Overrun Charge	($4)	$0	$0	$264	($264)	$0	$0	$0	$23	($23)	$0	$2	($2)
Total Gas Cost Revenues	$66,846	$187,023	$534,804	$818,163	$999,348	$834,088	$519,107	$235,548	$69,758	$9,330	$41,897	$75,312	$4,391,223
Total Revenues	$327,734	$556,915	$1,077,957	$1,520,677	$1,758,755	$1,519,557	$1,049,867	$602,232	$342,215	$242,763	$293,966	$347,363	$9,640,002

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

SCPA < 250 SATC	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	768	763	761	759	760	753	735	715	700	695	682	673	8,761
Total Volume	1,746	4,470	11,969	18,684	20,299	16,604	9,694	4,700	1,303	(1)	662	1,169	91,298
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$19,832	$20,509	$20,810	$20,996	$20,214	$20,231	$19,826	$19,998	$19,447	$17,689	$18,485	$18,487	$236,523
All Mcf	$4,017	$10,281	$27,523	$42,963	$46,677	$38,182	$22,292	$10,808	$2,998	($2)	$1,522	$2,687	$209,949
Revenue Rounding	($2)	$0	($1)	($1)	($2)	($0)	($1)	($1)	($1)	$0	$1	$0	($7)
Rider B - State Tax Adjustment	($10)	($33)	($48)	($64)	($66)	($61)	($44)	($30)	($21)	($17)	($17)	($20)	($432)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DSIC - Distribution System Improvement Charge	$0	$0	$0	$262	$302	$276	$489	$332	$232	$368	$385	$408	$3,054
Weather Normalization Adjustment	$1,037	$3,116	$408	($778)	($1,257)	$2,056	$2,457	$187	($79)	($15)	($7)	$4	$7,128
Total Base Non Gas Cost Rate Revenue	$24,873	$33,873	$48,692	$63,380	$65,867	$60,684	$45,019	$31,295	$22,576	$18,022	$20,368	$21,566	$456,215
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$38	$99	$284	$443	$481	$394	$230	$112	$31	($0)	$11	$19	$2,141
Rider A - Distribution Charge	$599	$1,535	$4,117	$6,427	$7,079	$5,884	$3,435	$1,665	$462	$1	$269	$501	$31,971
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($183)	($473)	($1,268)	($1,978)	($2,149)	($1,758)	($1,026)	($498)	($138)	$1	($70)	($124)	($9,664)
Tax Cuts & Jobs Act Refund	$157	$571	$1,516	$2,358	$2,558	$2,096	$1,223	$593	$164	($0)	$84	$148	$11,468
Total Gas Cost Revenues	$611	$1,732	$4,650	$7,250	$7,969	$6,615	$3,862	$1,872	$519	$1	$294	$543	$35,916
Total Revenues	$25,484	$35,605	$53,342	$70,630	$73,836	$67,298	$48,881	$33,167	$23,095	$18,023	$20,662	$22,109	$492,131

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

SCPA < 250 MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	1,156	1,165	1,167	1,168	1,139	1,130	1,128	1,119	1,168	1,164	1,162	1,155	13,818
Total Volume	3,431	8,315	21,712	33,790	38,465	27,377	16,328	7,454	3,409	427	1,384	1,988	164,079
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$29,292	$31,382	$31,839	$32,567	$30,429	$30,329	$30,403	$31,614	$31,886	$30,308	$31,181	$31,999	$373,230
All Mcf	$7,889	$19,119	$49,924	$77,696	$88,478	$62,952	$37,546	$17,141	$7,840	$982	$3,183	$4,573	$377,321
Revenue Rounding	$0	$0	($1)	($0)	($1)	($1)	($0)	($1)	($1)	$2	($1)	($1)	($5)
Rider B - State Tax Adjustment	($17)	($55)	($84)	($114)	($125)	($101)	($73)	($48)	($38)	($31)	($30)	($35)	($752)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DSIC - Distribution System Improvement Charge	$0	$0	$0	$456	$553	$462	$793	$541	$415	$638	$669	$717	$5,244
Weather Normalization Adjustment	$2,020	$5,573	$822	($1,702)	($2,081)	$3,568	$3,893	$78	($46)	$10	($9)	$0	$12,127
Total Base Non Gas Cost Rate Revenue	$39,184	$56,020	$82,501	$108,901	$117,253	$97,210	$72,561	$49,325	$40,055	$31,909	$34,993	$37,253	$767,166
Gas Cost Revenues:													
MMT Gas Cost Charge	$1,614	$3,910	$10,205	$15,883	$18,001	$12,868	$7,663	$3,504	$1,593	$201	$670	$979	$77,091
Rider I - OPEB Surcredit	($295)	($695)	($1,814)	($2,824)	($3,222)	($2,288)	($1,366)	($623)	($286)	($37)	($116)	($166)	($13,733)
Tax Cuts & Jobs Act Refund	$248	$917	$2,386	$3,714	$4,063	$3,007	$1,778	$819	$355	$46	$151	$218	$17,701
Priority Standby	$192	$401	$843	$1,323	$1,543	$1,305	$1,048	$448	$374	$94	$210	$201	$7,983
Total Gas Cost Revenues	$1,759	$4,532	$11,619	$18,097	$20,385	$14,892	$9,124	$4,149	$2,036	$304	$915	$1,231	$89,043
Total Revenues	$40,943	$60,552	$94,120	$126,998	$137,638	$112,102	$81,685	$53,474	$42,091	$32,213	$35,909	$38,484	$856,208

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
SCPA > 250 Sales													
Customers	2,720	2,732	2,747	2,764	2,771	2,691	2,698	2,711	2,702	2,698	2,701	2,702	32,634
Total Volume	35,775	71,822	172,106	250,344	268,670	214,533	143,229	81,339	35,095	18,456	24,510	30,849	1,346,728
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$93,981	$100,941	$103,523	$105,249	$101,172	$99,052	$99,007	$104,417	$101,192	$97,411	$99,806	$102,019	$1,207,770
All Mcf	$73,536	$147,618	$353,765	$514,583	$552,252	$440,973	$294,407	$167,547	$72,138	$37,938	$51,804	$63,411	$2,769,972
Revenue Rounding	($3)	($4)	($2)	($1)	$2	$0	($2)	($0)	($3)	($4)	($8)	($5)	($31)
Rider B - State Tax Adjustment	($87)	($281)	($465)	($625)	($658)	($576)	($425)	($272)	($167)	($130)	($147)	($162)	($3,996)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	($0)	$0	$0	($0)
Rider G - Merchant Function Charge	$440	$906	$2,238	$3,254	$3,741	$3,197	$2,133	$1,211	$522	$277	$418	$576	$18,915
Rider H - Gas Procurement Charge	$4,110	$8,252	$19,775	$28,765	$30,870	$24,650	$16,457	$9,366	$4,032	$2,120	$2,895	$3,545	$154,836
DSIC - Distribution System Improvement Charge	$0	$0	$0	$2,566	$2,995	$2,627	$4,626	$3,009	$1,877	$2,848	$2,993	$3,400	$26,942
Weather Normalization Adjustment	$12,814	$37,977	$3,617	($9,598)	($13,848)	$25,423	$26,710	$2,008	($713)	$23	$197	($100)	$84,510
Total Base Non Gas Cost Rate Revenue	$184,790	$295,408	$482,451	$644,194	$676,525	$595,347	$442,914	$287,286	$178,879	$140,483	$157,959	$172,683	$4,258,919
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$156,240	$317,814	$774,019	$1,125,748	$1,281,474	$1,085,387	$724,316	$411,581	$177,405	$93,431	$129,065	$161,799	$6,438,280
Rider A - Distribution Charge	$12,271	$24,659	$59,202	$86,118	$93,778	$76,043	$50,766	$28,886	$12,436	$6,538	$9,898	$13,408	$474,003
Rider A - Gas Adjustment Charge	($26,326)	($49,723)	($110,277)	($160,554)	($172,295)	($137,692)	($91,925)	($52,533)	($22,508)	($11,743)	($5,384)	$8,384	($832,576)
Rider I - OPEB Surcredit	($4,136)	($8,451)	($20,250)	($29,458)	($31,615)	($25,241)	($16,849)	($9,584)	($4,129)	($2,172)	($2,962)	($3,630)	($158,476)
Tax Cuts & Jobs Act Refund	$1,528	$5,424	$12,930	$18,789	$20,165	$16,081	$10,736	$6,069	$2,635	$1,409	$1,853	$2,328	$99,947
DMT Standby Overrun Charge	($120)	$0	$0	$183	($183)	$151	$100	$8	$43	$27	$0	$41	$250
Total Gas Cost Revenues	$139,456	$289,725	$715,623	$1,040,826	$1,191,324	$1,014,729	$677,145	$384,428	$165,883	$87,489	$132,470	$182,330	$6,021,429
Total Revenues	$324,246	$585,133	$1,198,075	$1,685,020	$1,867,849	$1,610,075	$1,120,059	$671,714	$344,762	$227,972	$290,429	$355,013	$10,280,348

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

SCPA > 250 SATC	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	330	327	330	323	317	317	317	308	302	299	295	293	3,754
Total Volume	5,057	9,155	20,643	29,230	29,470	25,043	16,363	8,791	4,497	2,774	3,279	4,003	158,306
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$11,614	$11,998	$12,380	$12,101	$11,630	$11,726	$11,600	$11,612	$11,312	$10,834	$10,680	$11,112	$138,599
All Mcf	$10,394	$18,818	$42,432	$60,083	$60,576	$51,476	$33,634	$18,071	$9,243	$5,702	$6,741	$8,229	$325,398
Revenue Rounding	($1)	($1)	($0)	$0	$0	$0	$0	($0)	$0	($1)	($0)	($0)	($2)
Rider B - State Tax Adjustment	($11)	($35)	($56)	($73)	($73)	($67)	($48)	($30)	($20)	($16)	($17)	($19)	($465)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DSIC - Distribution System Improvement Charge	$0	$0	$0	$320	$330	$305	$534	$337	$223	$351	$356	$395	$3,151
Weather Normalization Adjustment	$1,680	$4,699	$357	($1,137)	($1,319)	$2,940	$2,562	$330	($115)	$10	($8)	$1	$10,000
Total Base Non Gas Cost Rate Revenue	$23,676	$35,479	$55,113	$71,293	$71,145	$66,380	$48,281	$30,320	$20,642	$16,881	$17,753	$19,719	$476,681
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$111	$206	$487	$690	$696	$591	$386	$207	$106	$65	$65	$66	$3,677
Rider A - Distribution Charge	$1,734	$3,144	$7,101	$10,055	$10,290	$8,875	$5,800	$3,117	$1,594	$983	$1,296	$1,725	$55,711
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($583)	($1,077)	($2,429)	($3,440)	($3,468)	($2,946)	($1,925)	($1,034)	($529)	($326)	($386)	($471)	($18,613)
Tax Cuts & Jobs Act Refund	$188	$693	$1,553	$2,196	$2,211	$1,880	$1,228	$660	$338	$209	$246	$301	$11,702
Total Gas Cost Revenues	$1,450	$2,966	$6,712	$9,502	$9,729	$8,399	$5,489	$2,950	$1,508	$931	$1,221	$1,621	$52,477
Total Revenues	$25,126	$38,445	$61,825	$80,795	$80,874	$74,779	$53,769	$33,269	$22,151	$17,812	$18,974	$21,339	$529,158

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

SCPA > 250 MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	1,248	1,254	1,252	1,253	1,252	1,252	1,255	1,240	1,246	1,247	1,241	1,235	14,973
Total Volume	19,945	39,280	91,471	139,737	147,155	117,973	78,236	42,962	22,722	9,195	13,020	15,005	736,699
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$43,872	$46,187	$47,035	$47,830	$46,005	$45,778	$46,316	$46,947	$47,208	$44,649	$45,754	$46,304	$553,886
All Mcf	$40,996	$80,740	$188,018	$287,229	$302,438	$242,493	$160,813	$88,308	$46,704	$18,901	$26,763	$30,844	$1,514,249
Revenue Rounding	($1)	($1)	($0)	($1)	($0)	($0)	($1)	($1)	($1)	($1)	($2)	($1)	($10)
Rider B - State Tax Adjustment	($44)	($152)	($258)	($364)	($375)	($326)	($240)	($146)	($97)	($64)	($74)	($79)	($2,218)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DSIC - Distribution System Improvement Charge	$0	$0	$0	$1,361	$1,695	$1,492	$2,483	$1,627	$1,084	$1,362	$1,521	$1,627	$14,253
Weather Normalization Adjustment	$6,556	$20,254	$4,796	($4,836)	($8,634)	$11,530	$15,789	$1,275	($648)	$50	$2	($41)	$46,093
Total Base Non Gas Cost Rate Revenue	$91,379	$147,028	$239,591	$331,220	$341,130	$300,967	$225,161	$138,011	$94,250	$64,897	$73,964	$78,655	$2,126,252
Gas Cost Revenues:													
MMT Gas Cost Charge	$9,388	$18,471	$42,992	$65,677	$69,111	$55,448	$36,771	$20,193	$10,680	$4,322	$6,245	$7,368	$346,666
Rider I - OPEB Surcredit	($2,309)	($4,439)	($10,341)	($15,797)	($16,638)	($13,337)	($8,844)	($4,857)	($2,569)	($1,040)	($1,472)	($1,696)	($83,339)
Tax Cuts & Jobs Act Refund	$674	$2,701	$6,263	$9,568	$10,016	$8,078	$5,357	$2,942	$1,556	$630	$892	$1,027	$49,704
Priority Standby	$3,056	$4,659	$8,144	$12,866	$12,663	$10,921	$7,936	$5,694	$3,714	$2,041	$2,256	$2,394	$76,344
Total Gas Cost Revenues	$10,810	$21,392	$47,058	$72,315	$75,153	$61,109	$41,219	$23,972	$13,381	$5,953	$7,921	$9,092	$389,375
Total Revenues	$102,189	$168,421	$286,649	$403,535	$416,283	$362,077	$266,380	$161,983	$107,631	$70,850	$81,885	$87,747	$2,515,627

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
LCPA Sales													
Customers	453	453	461	473	479	457	446	443	444	444	438	440	5,428
Total Volume	26,361	47,013	95,908	145,470	163,454	138,262	99,393	60,578	36,853	23,696	24,161	23,003	884,151
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$64,922	$67,596	$72,160	$73,281	$71,140	$68,148	$66,516	$64,411	$68,583	$65,608	$63,198	$66,609	$812,172
All Mcf	$43,818	$78,145	$159,418	$241,800	$271,693	$229,820	$165,210	$100,693	$61,257	$39,387	$40,160	$38,261	$1,469,662
Bypass Service	$0	$613	$424	$0	($2,891)	$948	$1,879	$0	$0	$0	$1,954	$0	$2,928
Revenue Rounding	($0)	($0)	($0)	($0)	($0)	$0	($0)	($0)	($0)	($0)	($0)	($0)	($2)
Rider B - State Tax Adjustment	($43)	($145)	($239)	($330)	($356)	($315)	($244)	($172)	($130)	($104)	($105)	($102)	($2,285)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$324	$590	$1,246	$1,891	$2,225	$2,059	$1,481	$905	$549	$353	$394	$440	$12,458
Rider H - Gas Procurement Charge	$3,029	$5,402	$11,020	$16,715	$18,781	$15,886	$11,420	$6,960	$4,234	$2,723	$2,776	$2,645	$101,590
DSIC - Distribution System Improvement Charge	$0	$0	$0	$1,051	$1,601	$1,431	$2,160	$1,927	$1,459	$1,921	$2,199	$2,243	$15,992
Total Base Non Gas Cost Rate Revenue	$112,050	$152,201	$244,029	$334,408	$362,192	$317,978	$248,422	$174,723	$135,952	$109,888	$110,575	$110,096	$2,412,515
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$115,110	$207,488	$431,209	$654,173	$764,779	$699,019	$502,771	$306,827	$186,422	$119,839	$123,892	$120,585	$4,232,115
Rider A - Distribution Charge	$9,041	$16,140	$32,994	$50,037	$56,784	$48,993	$35,225	$21,467	$13,061	$8,397	$9,276	$10,248	$311,662
Rider I - OPEB Surcredit	($2,618)	($4,390)	($8,951)	($13,575)	($15,282)	($12,903)	($9,276)	($5,647)	($3,439)	($2,211)	($2,255)	($2,147)	($82,695)
Tax Cuts & Jobs Act Refund	$778	$3,381	$6,933	$10,530	$11,627	$10,005	$7,192	$4,428	$2,667	$1,715	$1,748	$1,687	$62,690
DMT Standby Overrun Charge	($269)	$0	$0	$398	$0	$0	$0	$0	$0	$0	$0	$0	$129
Total Gas Cost Revenues	$102,652	$189,652	$400,549	$608,325	$712,751	$656,446	$472,172	$288,483	$175,077	$112,544	$125,255	$139,136	$3,983,043
Total Revenues	$214,701	$341,853	$644,578	$942,733	$1,074,944	$974,425	$720,594	$463,206	$311,029	$222,432	$235,830	$249,232	$6,395,558

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

LCPA SATC	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	51	51	51	48	49	45	44	44	45	43	43	43	556
Total Volume	3,245	6,183	10,867	15,066	14,931	12,610	7,710	6,188	2,648	2,521	2,176	2,573	86,717
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$7,523	$7,674	$7,998	$7,356	$7,194	$6,768	$6,536	$6,946	$6,392	$6,644	$6,439	$6,199	$83,669
All Mcf	$5,393	$10,277	$18,063	$25,042	$24,818	$20,960	$12,816	$10,285	$4,402	$4,190	$3,618	$4,276	$144,141
Revenue Rounding	$0	$0	$0	($0)	$0	($0)	($0)	$0	($0)	($0)	($0)	$0	($0)
Rider B - State Tax Adjustment	($5)	($18)	($27)	($34)	($34)	($29)	($20)	($18)	($11)	($11)	($10)	($11)	($227)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DSIC - Distribution System Improvement Charge	$0	$0	$0	$123	$153	$132	$201	$196	$119	$210	$207	$219	$1,559
Total Base Non Gas Cost Rate Revenue	$12,911	$17,934	$26,034	$32,487	$32,132	$27,830	$19,533	$17,410	$10,902	$11,033	$10,253	$10,683	$229,142
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$71	$139	$257	$356	$353	$298	$182	$146	$63	$60	$45	$42	$2,012
Rider A - Distribution Charge	$1,113	$2,123	$3,738	$5,183	$5,200	$4,468	$2,733	$2,193	$939	$893	$839	$1,111	$30,533
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($321)	($577)	($1,014)	($1,406)	($1,393)	($1,177)	($720)	($577)	($247)	($235)	($203)	($240)	($8,112)
Tax Cuts & Jobs Act Refund	$101	$447	$786	$1,090	$1,080	$912	$558	$448	$192	$182	$157	$186	$6,140
Total Gas Cost Revenues	$963	$2,132	$3,767	$5,223	$5,240	$4,502	$2,753	$2,209	$946	$900	$839	$1,100	$30,574
Total Revenues	$13,874	$20,065	$29,801	$37,710	$37,372	$32,332	$22,286	$19,619	$11,847	$11,934	$11,092	$11,783	$259,715

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

LCPA MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	1,007	1,003	1,003	1,001	996	983	978	975	975	977	982	980	11,858
Total Volume	138,873	276,570	447,874	675,268	808,849	668,496	510,448	349,378	212,432	124,457	111,994	145,114	4,469,750
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$150,362	$151,092	$152,722	$154,647	$148,655	$148,075	$147,245	$148,024	$154,865	$139,321	$149,427	$150,671	$1,795,106
All Mcf	$230,834	$459,714	$744,455	$1,122,214	$1,344,468	$1,111,174	$848,466	$580,735	$353,105	$206,872	$186,157	$241,208	$7,429,402
Revenue Rounding	$0	($0)	($0)	($0)	($0)	($0)	$0	($1)	($0)	($1)	($0)	($1)	($3)
Rider B - State Tax Adjustment	($69)	($693)	($1,046)	($1,504)	($1,768)	($1,484)	($1,164)	($845)	($581)	($380)	($370)	($442)	($10,346)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DSIC - Distribution System Improvement Charge	$0	$0	$0	$1,665	$8,027	$6,806	$7,008	$9,437	$6,482	$5,199	$7,646	$9,058	$61,329
Total Base Non Gas Cost Rate Revenue	$381,128	$610,114	$896,132	$1,277,022	$1,499,382	$1,264,571	$1,001,555	$737,350	$513,870	$351,011	$342,859	$400,495	$9,275,489
Gas Cost Revenues:													
MMT Gas Cost Charge	$65,271	$129,988	$210,463	$317,065	$380,152	$314,036	$239,911	$164,208	$99,844	$58,495	$52,884	$71,094	$2,103,410
Rider I - OPEB Surcredit	($16,459)	($33,318)	($53,962)	($81,345)	($97,450)	($80,536)	($61,494)	($42,093)	($25,594)	($14,994)	($13,493)	($17,483)	($538,222)
Tax Cuts & Jobs Act Refund	$55	$13,404	$21,874	$32,668	$39,403	$32,469	$24,760	$17,022	$10,350	$6,064	$5,456	$7,070	$210,595
Priority Standby	$31,559	$53,069	$84,353	$125,650	$141,894	$120,189	$93,798	$61,803	$46,161	$20,798	$23,805	$29,159	$832,239
Total Gas Cost Revenues	$80,426	$163,143	$262,728	$394,039	$464,000	$386,158	$296,974	$200,940	$130,760	$70,362	$68,652	$89,840	$2,608,022
Total Revenues	$461,554	$773,256	$1,158,860	$1,671,060	$1,963,382	$1,650,729	$1,298,530	$938,290	$644,631	$421,373	$411,511	$490,334	$11,883,510
Unit Margin ($/Mcf)	$2.7444	$2.2060	$2.0009	$1.8911	$1.8537	$1.8917	$1.9621	$2.1105	$2.4190	$2.8203	$3.0614	$2.7599	$2.0752
Per Book Revenue	$461,554	$773,256	$1,158,860	$1,671,060	$1,963,382	$1,650,729	$1,298,530	$938,290	$644,631	$421,373	$411,511	$490,334	$11,883,510
Variance (Total Revenues - Per Book)	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Percent Variance	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
LCPA DMT													
Customers	14	14	14	14	14	13	13	13	13	13	13	13	161
Transportation Volumes	54,866	67,241	81,230	117,176	100,885	101,603	92,597	76,980	54,279	51,300	53,609	50,853	902,620
Sales - First 300 Mcf	113	458	0	0	2	1	0	0	0	0	1	44	619
Total Volume	54,979	67,699	81,230	117,176	100,887	101,604	92,597	76,980	54,279	51,300	53,610	50,898	903,240
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$2,114	$2,114	$2,114	$2,265	$1,963	$1,963	$1,963	$1,963	$1,963	$1,963	$1,963	$1,963	$24,311
Transportation Volumes	$91,198	$111,768	$135,021	$194,770	$167,691	$168,885	$153,914	$127,956	$90,222	$85,271	$89,110	$84,529	$1,500,336
Sales - Mcf	$188	$761	$0	$0	$3	$1	$0	$0	$0	$0	$2	$73	$1,029
Revenue Rounding	($0)	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	($0)	$0
Rider B - State Tax Adjustment	$0	($99)	($118)	($170)	($147)	($148)	($135)	($113)	($80)	($76)	($80)	($76)	($1,242)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$1	$6	$0	$0	$0	$0	$0	$0	$0	$0	$0	$1	$8
Rider H - Gas Procurement Charge	$13	$53	$0	$0	$0	$0	$0	$0	$0	$0	$0	$5	$71
DSIC - Distribution System Improvement Charge	$0	$0	$0	$0	$759	$671	$612	$1,256	$892	$844	$1,649	$1,567	$8,250
Total Base Non Gas Cost Rate Revenue	$93,514	$114,603	$137,017	$196,866	$170,271	$171,372	$156,354	$131,062	$92,996	$88,002	$92,643	$88,062	$1,532,763
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$494	$1,999	$0	$0	$9	$4	$0	$0	$0	$0	$5	$231	$2,743
Rider A - Distribution Charge	$39	$157	$0	$0	$1	$0	$0	$0	$0	$0	$0	$19	$216
Rider A - Gas Adjustment Charge	($83)	($337)	$0	$0	($1)	($1)	$0	$0	$0	$0	($1)	$10	($413)
Rider I - OPEB Surcredit	($6,495)	($8,144)	($9,787)	($14,117)	($12,155)	($12,241)	($11,156)	($9,275)	($6,539)	($6,181)	($6,459)	($6,131)	($108,679)
Tax Cuts & Jobs Act Refund	($460)	$3,309	$3,958	$5,709	$4,915	$4,950	$4,511	$3,750	$2,644	$2,499	$2,612	$2,481	$40,879
DMT Standby Overrun Charges	$64	$263	$0	$0	$3	$1	$0	$0	$0	$0	$1	$34	$366
Market Rate Differential	$0	$0	$0	$0	$2	$3	$0	$0	$0	$0	$0	$0	$5
Overdelivery Charges	$4,126	$4,651	$5,150	$8,174	$8,588	$7,554	$6,759	$6,898	$6,750	$7,375	$6,161	$6,064	$78,251
Total Gas Cost Revenues	($2,316)	$1,899	($679)	($235)	$1,362	$272	$115	$1,374	$2,855	$3,694	$2,319	$2,708	$13,368
Total Revenues	$91,199	$116,502	$136,338	$196,631	$171,633	$171,644	$156,469	$132,436	$95,852	$91,696	$94,962	$90,770	$1,546,131

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
PA NGV													
Customers	7	7	7	7	7	8	6	7	7	7	7	7	84
Total Volume	9,186	10,122	9,492	8,775	9,212	10,783	7,273	8,042	8,455	8,913	8,754	9,649	108,656
Base Non Gas Cost Rate Revenue:													
Margin	$18,710	$20,616	$19,333	$17,873	$18,763	$25,200	$16,997	$18,794	$19,759	$20,830	$20,457	$18,957	$236,291
Revenue Rounding	($0)	($0)	($0)	($0)	$0	$0	($0)	$0	($0)	($0)	$0	($0)	($0)
Rider B - State Tax Adjustment	$0.000	$0.000	($42.710)	($39.490)	($41.460)	($57.150)	($38.550)	($42.630)	($44.810)	($47.240)	($46.400)	($57.880)	($458.320)
DSIC - Distribution System Improvement Charge	$0.000	$0.000	$0.000	$0.250	$193.340	$261.030	$176.080	$479.550	$504.180	$532.010	$976.870	$1,222.090	$4,345.400
Total Base Non Gas Cost Rate Revenue	$18,710	$20,616	$19,291	$17,834	$18,915	$25,404	$17,135	$19,231	$20,219	$21,314	$21,388	$20,122	$240,178
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$25,228	$27,798	$26,670	$24,655	$25,883	$34,710	$23,412	$25,887	$27,217	$28,691	$28,180	$33,860	$332,191
Rider A - Distribution Charge	$8,629	$9,509	$9,298	$8,596	$9,024	$11,389	$7,682	$8,494	$8,930	$9,414	$9,246	$9,873	$110,084
Rider A - Gas Adjustment Charge	($7,646)	($8,425)	($7,358)	($6,802)	($7,141)	($8,359)	($5,638)	($6,234)	($6,554)	($6,909)	($6,784)	$1,330	($76,523)
Tax Cuts & Jobs Act Refund	($95)	$732	$687	$635	$667	$780	$526	$582	$612	$645	$633	$698	$7,103
Total Gas Cost Revenues	$26,115	$29,614	$29,297	$27,084	$28,433	$38,521	$25,982	$28,729	$30,204	$31,840	$31,275	$45,761	$372,854
Total Revenues	$44,825	$50,230	$48,587	$44,917	$47,348	$63,925	$43,116	$47,960	$50,423	$53,155	$52,663	$65,883	$613,032

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
SVIS Sales													
Customers	116	118	125	126	127	128	134	130	129	127	125	126	1,509
Total Volume	665	2,307	8,667	13,582	14,455	11,851	5,511	3,357	1,302	160	357	184	62,396
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$8,828	$9,670	$10,507	$10,792	$10,605	$10,343	$10,878	$10,968	$10,697	$10,204	$10,002	$10,302	$123,794
All Mcf	$1,379	$4,780	$17,959	$28,145	$29,953	$24,557	$11,419	$6,957	$2,697	$332	$740	$380	$129,298
Bypass Service	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Revenue Rounding	($0)	$0	$0	($0)	($0)	$0	($0)	($0)	$0	$0	$0	$0	$1
Rider B - State Tax Adjustment	($4)	($14)	($29)	($40)	($42)	($36)	($22)	($18)	($13)	($10)	($10)	($10)	($247)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$8	$29	$113	$177	$199	$176	$82	$50	$19	$2	$6	$4	$867
Rider H - Gas Procurement Charge	$76	$265	$996	$1,561	$1,661	$1,362	$633	$386	$149	$18	$41	$21	$7,169
DSIC - Distribution System Improvement Charge	$0	$0	$0	$138	$191	$165	$231	$194	$143	$193	$207	$207	$1,667
Total Base Non Gas Cost Rate Revenue	$10,287	$14,731	$29,545	$40,772	$42,566	$36,566	$23,221	$18,537	$13,693	$10,740	$10,986	$10,904	$262,548
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$2,905	$10,211	$38,970	$61,077	$68,355	$59,913	$27,875	$16,950	$6,584	$811	$1,850	$995	$296,495
Rider A - Distribution Charge	$228	$792	$2,981	$4,672	$5,034	$4,199	$1,953	$1,189	$461	$57	$146	$95	$21,809
Rider A - Gas Adjustment Charge	($490)	($1,597)	($5,559)	($8,710)	($9,270)	($7,600)	($3,534)	($2,153)	($835)	($103)	($9)	$219	($39,640)
Rider I - OPEB Surcredit	($42)	($138)	($517)	($811)	($863)	($707)	($329)	($200)	($78)	($10)	($21)	($11)	($3,728)
Tax Cuts & Jobs Act Refund	$38	$239	$906	$1,420	$1,512	$1,239	$576	$351	$136	$17	$37	$19	$6,491
Total Gas Cost Revenues	$2,640	$9,508	$36,782	$57,648	$64,768	$57,045	$26,541	$16,136	$6,269	$772	$2,002	$1,316	$281,427
Total Revenues	$12,927	$24,239	$66,327	$98,420	$107,335	$93,611	$49,762	$34,674	$19,962	$11,512	$12,988	$12,220	$543,975

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

SVIS SATC	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	10	10	11	10	10	11	12	13	11	11	11	11	130
Total Volume	4	103	449	756	900	918	491	242	(182)	37	14	31	3,762
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$641	$835	$917	$835	$791	$902	$952	$1,079	$820	$902	$887	$885	$10,447
All Mcf	$7	$214	$930	$1,566	$1,865	$1,901	$1,018	$501	($376)	$76	$29	$65	$7,796
Revenue Rounding	$0	($0)	($0)	$0	($0)	($0)	($0)	($0)	$0	$0	$0	($0)	($0)
Rider B - State Tax Adjustment	($0)	($1)	($2)	($2)	($3)	($3)	($2)	($2)	($0)	($1)	($1)	($1)	($18)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DSIC - Distribution System Improvement Charge	$0	$0	$0	$9	$12	$13	$20	$17	$6	$18	$17	$18	$132
Total Base Non Gas Cost Rate Revenue	$649	$1,048	$1,845	$2,408	$2,665	$2,814	$1,988	$1,596	$450	$995	$933	$967	$18,357
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$0	$2	$11	$18	$21	$22	$12	$6	($4)	$1	$0	$1	$89
Rider A - Distribution Charge	$1	$35	$154	$260	$312	$325	$174	$86	($63)	$13	$6	$13	$1,317
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($0)	($6)	($27)	($45)	($54)	($55)	($29)	($14)	$11	($2)	($1)	($2)	($224)
Tax Cuts & Jobs Act Refund	$3	$11	$47	$79	$94	$96	$51	$25	($19)	$4	$1	$3	$396
Total Gas Cost Revenues	$4	$42	$185	$312	$374	$388	$208	$102	($76)	$16	$7	$15	$1,577
Total Revenues	$653	$1,090	$2,031	$2,719	$3,039	$3,202	$2,196	$1,698	$374	$1,011	$940	$982	$19,935

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
SVIS MMT													
Customers	64	65	64	64	64	63	63	63	63	63	63	63	762
Total Volume	649	2,930	5,044	8,606	9,518	6,749	3,878	1,703	666	4,821	264	301	45,129
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$5,069	$5,237	$5,278	$5,421	$5,119	$5,044	$5,035	$5,067	$5,084	$5,069	$5,105	$5,055	$61,584
All Mcf	$1,345	$6,072	$10,451	$17,834	$19,724	$13,985	$8,036	$3,528	$1,379	$9,991	$547	$623	$93,516
Revenue Rounding	($0)	($0)	$0	($0)	($0)	($0)	$0	($0)	($0)	($0)	($0)	($0)	($1)
Rider B - State Tax Adjustment	($2)	($13)	($15)	($25)	($27)	($21)	($14)	($9)	($6)	($14)	($5)	($5)	($157)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DSIC - Distribution System Improvement Charge	$0	$0	$0	$76	$123	$93	$129	$96	$69	$132	$110	$110	$938
Total Base Non Gas Cost Rate Revenue	$6,412	$11,297	$15,714	$23,306	$24,939	$19,101	$13,186	$8,682	$6,526	$15,178	$5,756	$5,783	$155,881
Gas Cost Revenues:													
MMT Gas Cost Charge	$305	$1,377	$2,371	$4,045	$4,474	$3,172	$1,823	$800	$313	$2,212	$125	$148	$21,164
Rider I - OPEB Surcredit	($15)	($69)	($119)	($202)	($224)	($159)	($91)	($40)	($16)	($112)	($6)	($7)	($1,060)
Tax Cuts & Jobs Act Refund	$32	$271	$469	$800	$885	$627	$360	$158	$62	$353	$25	$28	$4,070
Priority Standby	$0	$1,334	($1,685)	$0	$0	$0	$0	$0	$0	$0	$0	$0	($351)
Total Gas Cost Revenues	$322	$2,913	$1,036	$4,642	$5,135	$3,641	$2,092	$919	$359	$2,453	$144	$168	$23,823
Total Revenues	$6,734	$14,210	$16,749	$27,948	$30,074	$22,742	$15,278	$9,601	$6,885	$17,631	$5,900	$5,951	$179,704

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
IVIS Sales													
Customers	59	60	59	57	57	57	53	53	54	54	51	52	665
Total Volume	9,501	12,234	20,860	36,140	38,828	32,288	21,695	13,198	7,599	4,931	6,495	6,738	210,506
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$14,478	$14,076	$15,522	$14,384	$14,213	$13,879	$13,551	$13,563	$13,724	$12,936	$12,852	$14,112	$167,290
All Mcf	$12,680	$16,328	$27,842	$48,236	$51,824	$43,094	$28,957	$17,615	$10,142	$6,581	$8,668	$8,994	$280,962
Revenue Rounding	($0)	($0)	($0)	($0)	($0)	($0)	($1)	($0)	($0)	$0	$0	($0)	($3)
Rider B - State Tax Adjustment	($8)	($30)	($44)	($66)	($70)	($60)	($44)	($32)	($24)	($19)	($22)	($23)	($442)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$117	$153	$271	$470	$519	$481	$325	$197	$113	$73	$98	$124	$2,941
Rider H - Gas Procurement Charge	$1,092	$1,406	$2,397	$4,152	$4,461	$3,710	$2,493	$1,516	$873	$567	$746	$774	$24,187
DSIC - Distribution System Improvement Charge	$0	$0	$0	$124	$320	$273	$314	$355	$266	$296	$444	$483	$2,876
Total Base Non Gas Cost Rate Revenue	$28,359	$31,932	$45,986	$67,301	$71,267	$61,377	$45,595	$33,214	$25,095	$20,435	$22,786	$24,464	$477,811
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$41,477	$53,902	$93,779	$162,519	$178,881	$163,177	$110,240	$66,760	$38,438	$24,943	$32,895	$35,225	$1,002,235
Rider A - Distribution Charge	$3,259	$4,200	$7,176	$12,432	$13,436	$11,440	$7,698	$4,677	$2,693	$1,748	$2,321	$2,896	$73,975
Rider I - OPEB Surcredit	($1,073)	($1,629)	($2,798)	($4,847)	($5,208)	($4,331)	($2,910)	($1,770)	($1,019)	($661)	($871)	($904)	($28,022)
Tax Cuts & Jobs Act Refund	$108	$645	$1,139	$1,974	$2,120	$1,764	$1,185	$721	$415	$269	$355	$368	$11,062
DMT Standby Overrun Charges	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Gas Cost Revenues	$36,775	$48,466	$85,900	$148,902	$164,329	$151,347	$102,304	$61,924	$35,654	$23,136	$30,752	$39,033	$928,522
Total Revenues	$65,134	$80,399	$131,887	$216,203	$235,596	$212,723	$147,899	$95,138	$60,749	$43,571	$53,538	$63,497	$1,406,333

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
IVIS SATC													
Customers	3	3	3	4	4	3	3	3	3	3	3	3	38
Total Volume	18	226	740	1,699	1,456	988	965	447	99	14	4	9	6,665
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$756	$756	$756	$1,079	$955	$756	$756	$756	$756	$756	$756	$756	$9,594
All Mcf	$24	$302	$988	$2,268	$1,943	$1,319	$1,288	$597	$132	$19	$5	$12	$8,896
Revenue Rounding	($0)	($0)	$0	$0	($0)	($0)	($0)	($0)	($0)	$0	$0	$0	($0)
Rider B - State Tax Adjustment	($0)	($1)	($2)	($3)	($3)	($2)	($2)	($1)	($1)	($1)	($1)	($1)	($18)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DSIC - Distribution System Improvement Charge	$0	$0	$0	$8	$14	$10	$17	$15	$9	$15	$14	$15	$117
Total Base Non Gas Cost Rate Revenue	$780	$1,057	$1,742	$3,352	$2,908	$2,082	$2,059	$1,366	$897	$789	$775	$782	$18,589
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$0	$5	$17	$40	$34	$23	$23	$11	$2	$0	$0	$0	$157
Rider A - Distribution Charge	$6	$78	$255	$584	$504	$350	$342	$158	$35	$5	$2	$4	$2,323
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($2)	($30)	($99)	($228)	($195)	($133)	($129)	($60)	($13)	($2)	($1)	($1)	($894)
Tax Cuts & Jobs Act Refund	$1	$12	$40	$93	$79	$54	$53	$24	$5	$1	$0	$0	$364
Total Gas Cost Revenues	$5	$65	$213	$490	$423	$295	$288	$133	$30	$4	$1	$3	$1,950
Total Revenues	$785	$1,122	$1,955	$3,841	$3,331	$2,377	$2,347	$1,500	$926	$793	$776	$785	$20,539

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

IVIS MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	262	264	264	264	264	264	263	264	261	261	262	259	3,151
Total Volume	115,719	156,127	186,292	261,371	328,793	289,140	228,299	166,918	125,632	116,316	111,196	123,660	2,209,460
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$65,958	$67,701	$69,746	$65,603	$66,287	$65,204	$67,537	$67,382	$68,262	$65,349	$67,083	$66,795	$802,908
All Mcf	$127,010	$181,005	$235,441	$353,204	$438,835	$385,915	$304,710	$215,509	$154,101	$131,579	$115,807	$133,572	$2,776,687
LBS Demand Margin	$0	$0	$0	$0	$3	$3	$3	$3	$3	$3	$3	$3	$28
LBS Commodity Margin	$7,138	$6,876	$3,570	($1,111)	$1	$0	$0	$1,876	$3,521	$5,728	$8,099	$7,679	$43,379
Revenue Rounding	($0)	($0)	($0)	$0	($0)	$0	$0	($0)	($0)	$0	$0	$0	$0
Rider B - State Tax Adjustment	($11)	($288)	($352)	($485)	($590)	($524)	($428)	($326)	($256)	($232)	($221)	($242)	($3,955)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DSIC - Distribution System Improvement Charge	$0	$0	$0	$294	$2,695	$2,385	$2,244	$3,620	$2,852	$2,785	$4,555	$4,993	$26,422
Total Base Non Gas Cost Rate Revenue	$200,095	$255,295	$308,405	$417,505	$507,232	$452,984	$374,067	$288,064	$228,484	$205,212	$195,328	$212,801	$3,645,470
Gas Cost Revenues:													
MMT Gas Cost Charge	$54,388	$73,379	$87,557	$122,844	$154,533	$135,896	$107,300	$78,451	$59,047	$54,332	$52,322	$60,476	$1,040,526
Rider A - Natural Gas Supply Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider A - Distribution Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider I - OPEB Surcredit	($6,151)	($8,940)	($11,632)	($17,454)	($21,682)	($19,066)	($15,054)	($10,647)	($7,613)	($6,516)	($5,721)	($6,598)	($137,073)
Tax Cuts & Jobs Act Refund	($563)	$5,267	$6,986	$10,610	$13,073	$11,450	$9,031	$6,394	$4,572	$3,699	$3,436	$3,920	$77,875
Priority Standby	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Gas Cost Revenues	$47,674	$69,707	$82,912	$116,001	$145,924	$128,280	$101,277	$74,198	$56,006	$51,515	$50,037	$57,798	$981,328
Total Revenues	$247,769	$325,001	$391,317	$533,506	$653,155	$581,263	$475,344	$362,263	$284,489	$256,727	$245,364	$270,599	$4,626,798

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

IVIS DMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	24	24	24	24	24	24	25	25	26	26	26	26	298
Transportation Volume	37,967	49,449	53,613	76,570	97,112	82,668	75,166	60,733	50,263	45,497	43,636	41,260	713,934
Sales - Mcf	0	0	0	0	18	131	0	0	0	0	0	0	148
Total Volume	37,967	49,449	53,613	76,570	97,129	82,799	75,166	60,733	50,263	45,497	43,636	41,260	714,082
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$6,048	$6,048	$6,048	$6,048	$6,048	$6,048	$6,300	$6,300	$6,552	$6,552	$6,552	$6,544	$75,088
Transportation Volume	$50,675	$66,000	$71,558	$102,198	$129,615	$110,337	$100,324	$81,061	$67,087	$60,725	$58,240	$55,069	$952,888
Sales - Mcf	$0	$0	$0	$0	$23	$175	$0	$0	$0	$0	$0	$0	$198
Revenue Rounding	$0	$0	$0	$0	($0)	($0)	$0	$0	$0	$0	$0	$0	($0)
Rider B - State Tax Adjustment	$0	($64)	($69)	($96)	($120)	($103)	($95)	($78)	($66)	($60)	($58)	($55)	($864)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$0	$0	$0	$0	$0	$2	$0	$0	$0	$0	$0	$0	$2
Rider H - Gas Procurement Charge	$0	$0	$0	$0	$2	$15	$0	$0	$0	$0	$0	$0	$17
DSIC - Distribution System Improvement Charge	$0	$0	$0	$0	$546	$469	$429	$866	$731	$668	$1,203	$1,144	$6,055
Total Base Non Gas Cost Rate Revenue	$56,723	$71,984	$77,537	$108,150	$136,114	$116,942	$106,958	$88,149	$74,303	$67,885	$65,937	$62,702	$1,033,383
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$0	$0	$0	$0	$79	$662	$0	$0	$0	$0	$0	$0	$741
Rider A - Distribution Charge	$0	$0	$0	$0	$6	$46	$0	$0	$0	$0	$0	$0	$52
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	($11)	($84)	$0	$0	$0	$0	$0	$0	($95)
Rider I - OPEB Surcredit	($2,452)	($3,261)	($3,535)	($5,049)	($6,406)	($5,469)	($4,956)	($4,005)	($3,314)	($3,000)	($2,877)	($2,721)	($47,046)
Tax Cuts & Jobs Act Refund	($284)	$1,958	$2,123	$3,032	$3,847	$3,281	$2,977	$2,405	$1,990	$1,802	$1,728	$1,634	$26,492
Market Rate Differential	$0	$0	$0	$0	$16	$518	$0	$0	$0	$0	$0	$0	$534
DMT Standby Overrun Charges	$0	$0	$0	$0	$24	$201	$0	$0	$0	$0	$0	$0	$226
Overdelivery Charges	$6,175	$7,495	$8,277	$7,904	$10,366	$8,898	$9,367	$9,812	$8,854	$7,441	$8,149	$6,816	$99,553
Total Gas Cost Revenues	$3,439	$6,192	$6,865	$5,887	$7,920	$8,054	$7,387	$8,212	$7,530	$6,243	$6,999	$5,729	$80,457
Total Revenues	$60,162	$78,177	$84,402	$114,037	$144,034	$124,996	$114,345	$96,362	$81,833	$74,127	$72,936	$68,431	$1,113,840

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
LVIS MMT													
Customers	8	8	8	8	8	8	8	8	8	8	8	8	96
Total Volume	30,073	37,091	41,537	40,962	49,392	40,352	42,930	47,531	42,410	40,298	35,752	44,035	492,363
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$7,161	$7,161	$7,161	$7,161	$7,161	$7,161	$7,161	$7,161	$7,161	$7,161	$7,161	$7,161	$85,932
All Mcf	$30,804	$37,992	$42,546	$41,957	$50,592	$41,333	$43,973	$48,686	$43,441	$41,277	$36,621	$45,105	$504,327
Bypass Service	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Revenue Rounding	$0	$0	$0	$0	$0	($0)	$0	$0	$0	$0	$0	$0	$0
Rider B - State Tax Adjustment	$0	($55)	($61)	($60)	($72)	($60)	($63)	($70)	($63)	($60)	($54)	($66)	($684)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DSIC - Distribution System Improvement Charge	$0	$0	$0	$0	$325	$271	$286	$773	$698	$667	$1,122	$1,368	$5,511
Total Base Non Gas Cost Rate Revenue	$37,965	$45,098	$49,646	$49,058	$58,007	$48,705	$51,358	$56,551	$51,237	$49,045	$44,850	$53,567	$595,086
Gas Cost Revenues:													
MMT Gas Cost Charge	$14,134	$17,433	$19,522	$19,252	$23,214	$18,965	$20,177	$22,340	$19,933	$18,940	$16,803	$21,577	$232,291
Rider I - OPEB Surcredit	($1,893)	($2,300)	($2,575)	($2,540)	($3,062)	($2,502)	($2,662)	($2,947)	($2,629)	($2,498)	($2,217)	($2,730)	($30,555)
Tax Cuts & Jobs Act Refund	($47)	$1,049	$1,175	$1,159	$1,397	$1,142	$1,214	$1,345	$1,200	$1,140	$1,011	$1,246	$13,032
Priority Standby	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Gas Cost Revenues	$12,194	$16,182	$18,122	$17,871	$21,549	$17,605	$18,730	$20,737	$18,503	$17,582	$15,598	$20,093	$214,767
Total Revenues	$50,159	$61,281	$67,768	$66,929	$79,556	$66,310	$70,087	$77,288	$69,740	$66,627	$60,448	$73,660	$809,853

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
LVIS DMT													
Customers	21	21	21	21	21	21	19	19	19	19	19	19	240
Transportation Volume	118,163	140,776	153,459	185,786	239,941	211,716	175,193	134,375	127,065	110,366	122,837	106,497	1,826,174
Sales - Mcf	33	0	120	16	26	1,350	0	0	0	0	14,548	(14,024)	2,068
Total Volume	118,195	140,776	153,578	185,802	239,968	213,066	175,193	134,375	127,065	110,366	137,384	92,473	1,828,242
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$21,483	$21,483	$21,483	$21,483	$21,483	$21,483	$19,437	$19,437	$19,437	$19,437	$20,460	$19,437	$246,543
Transportation Volume	$121,034	$144,197	$157,188	$190,300	$245,772	$216,861	$179,450	$137,641	$130,153	$113,048	$125,822	$109,085	$1,870,550
Sales - Mcf	$33	$0	$123	$17	$27	$1,383	$0	$0	$0	$0	$14,901	($14,365)	$2,118
Revenue Rounding	$0	$0	($0)	($0)	$0	$0	$0	$0	$0	$0	$0	($0)	($0)
Rider B - State Tax Adjustment	$0	($145)	($156)	($185)	($234)	($211)	($174)	($139)	($132)	($117)	($149)	($97)	($1,739)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$0	$0	$2	$0	$0	$20	$0	$0	$0	$0	$217	($207)	$32
Rider H - Gas Procurement Charge	$4	$0	$14	$2	$3	$155	$0	$0	$0	$0	$1,672	($1,611)	$238
DSIC - Distribution System Improvement Charge	$0	$0	$0	$0	$1,063	$956	$791	$1,541	$1,468	$1,300	$3,072	$1,990	$12,180
Total Base Non Gas Cost Rate Revenue	$142,555	$165,535	$178,652	$211,617	$268,114	$240,647	$199,504	$158,480	$150,926	$133,668	$165,994	$114,232	$2,129,923
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$142	$0	$539	$73	$118	$6,829	$0	$0	$0	$0	$73,588	($70,851)	$10,438
Rider A - Distribution Charge	$11	$0	$41	$6	$9	$478	$0	$0	$0	$0	$5,156	($4,930)	$771
Rider A - Gas Adjustment Charge	($24)	$0	($77)	($10)	($17)	($866)	$0	$0	$0	$0	($9,329)	$9,446	($877)
Rider I - OPEB Surcredit	($7,440)	($8,728)	($9,514)	($11,519)	($14,876)	($13,126)	($10,862)	($8,331)	($7,878)	($6,843)	($7,616)	($6,603)	($113,336)
Tax Cuts & Jobs Act Refund	($183)	$3,982	$4,341	$5,256	$6,788	$5,989	$4,956	$3,801	$3,595	$3,122	$3,475	$3,013	$48,136
Market Rate Differential	$0	$0	$0	$0	$23	$5,343	$0	$0	$0	$0	$0	$0	$5,366
DMT Standby Overrun Charges	$17	$0	$160	$22	$35	$2,000	$0	$0	$0	$0	$8,620	($8,252)	$2,602
Overdelivery Charges	$14,418	$17,795	$16,476	$19,016	$24,897	$22,420	$15,539	$18,266	$13,221	$13,272	$15,855	$12,183	$203,357
Total Gas Cost Revenues	$6,941	$13,049	$11,967	$12,843	$16,977	$29,067	$9,633	$13,736	$8,938	$9,552	$89,749	($65,995)	$156,457
Total Revenues	$149,496	$178,584	$190,619	$224,460	$285,091	$269,714	$209,137	$172,215	$159,864	$143,220	$255,743	$48,237	$2,286,380

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

LIS MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	1	1	1	1	1	1	1	1	1	1	1	1	12
Total Volume	30,946	30,426	32,253	29,558	35,804	32,014	33,409	30,961	29,869	26,644	26,501	27,507	365,892
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$1,165	$1,165	$1,165	$1,165	$1,165	$1,165	$1,165	$1,165	$1,165	$1,165	$1,165	$1,165	$13,980
All Mcf	$18,546	$18,234	$19,329	$17,714	$21,457	$19,186	$20,022	$18,555	$17,900	$15,968	$15,882	$16,485	$219,279
Revenue Rounding	$0	$0	$0	$0	($0)	$0	$0	$0	$0	$0	($0)	($0)	$0
Rider B - State Tax Adjustment	$0	($30)	($32)	($29)	($36)	($32)	($33)	($31)	($30)	($27)	($27)	($28)	($336)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
DSIC - Distribution System Improvement Charge	$0	$0	$0	$0	$161	$145	$151	$345	$334	$299	$556	$587	$2,578
Total Base Non Gas Cost Rate Revenue	$19,711	$19,369	$20,462	$18,850	$22,748	$20,464	$21,305	$20,034	$19,369	$17,405	$17,576	$18,209	$235,502
Gas Cost Revenues:													
MMT Gas Cost Charge	$14,545	$14,300	$15,159	$13,892	$16,828	$15,047	$15,702	$14,552	$14,038	$12,523	$12,455	$13,478	$172,519
Rider I - OPEB Surcredit	($495)	($425)	($450)	($413)	($500)	($447)	($466)	($432)	($417)	($372)	($370)	($384)	($5,171)
Tax Cuts & Jobs Act Refund	($63)	$351	$373	$341	$414	$370	$386	$358	$345	$308	$306	$318	$3,806
Priority Standby	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Total Gas Cost Revenues	$13,986	$14,227	$15,081	$13,821	$16,742	$14,969	$15,622	$14,477	$13,966	$12,458	$12,392	$13,412	$171,154
Total Revenues	$33,697	$33,596	$35,543	$32,671	$39,490	$35,433	$36,926	$34,511	$33,336	$29,863	$29,968	$31,621	$406,655

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
LIS DMT													
Customers	9	9	9	9	9	9	10	10	10	10	10	10	114
Transportation Volumes	224,392	255,936	285,279	366,592	422,581	389,864	382,886	285,535	215,840	177,881	207,824	198,815	3,413,425
Sales - Mcf	0	0	0	523	2,974	534	0	600	0	0	314	0	4,945
Total Volume	224,392	255,936	285,279	367,115	425,555	390,398	382,886	286,135	215,840	177,881	208,138	198,815	3,418,371
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$10,485	$10,485	$10,485	$10,485	$10,485	$10,485	$11,650	$11,650	$11,650	$11,650	$11,650	$11,650	$132,810
Transportation Volumes	$134,478	$153,383	$170,968	$219,699	$253,253	$233,645	$229,464	$171,121	$129,353	$106,604	$124,549	$119,150	$2,045,666
Sales - Mcf	$0	$0	$0	$0	$165	$98	$0	$360	$0	$0	$188	$0	$811
Revenue Rounding	$0	$0	$0	$0	($0)	($0)	$0	$0	$0	$0	($0)	$0	($0)
Rider B - State Tax Adjustment	$0	($147)	($163)	($206)	($238)	($220)	($217)	($166)	($128)	($107)	($125)	($120)	($1,836)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$0	$0	$0	$0	$4	$2	$0	$9	$0	$0	$5	$0	$20
Rider H - Gas Procurement Charge	$0	$0	$0	$0	$32	$19	$0	$69	$0	$0	$36	$0	$156
DSIC - Distribution System Improvement Charge	$0	$0	$0	$0	$1,078	$998	$985	$1,845	$1,419	$1,190	$2,571	$2,463	$12,548
Total Base Non Gas Cost Rate Revenue	$144,963	$163,721	$181,290	$229,977	$264,779	$245,028	$241,881	$184,888	$142,294	$119,337	$138,874	$133,143	$2,190,175
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$0	$0	$0	$0	$1,240	$830	$0	$3,034.55	$0	$0	$1,589	$0	$6,693
Rider A - Distribution Charge	$0	$0	$0	$0	$95	$58	$0	$213	$0	$0	$111	$0	$477
Rider A - Gas Adjustment Charge	$0	$0	$0	$0	($177)	($105)	$0	($385)	$0	$0	($201)	$0	($868)
Rider I - OPEB Surcredit	($3,593)	($3,573)	($3,982)	($5,118)	($5,899)	($5,442)	($5,345)	($3,986)	($3,013)	($2,483)	($2,901)	($2,775)	($48,111)
Tax Cuts & Jobs Act Refund	($458)	$2,956	$3,295	$4,234	$4,881	$4,503	$4,422	$3,298	$2,493	$2,055	$2,400	$2,296	$36,376
Market Rate Differential	$0	$0	$0	$0	$247	$649	$0	$0	$0	$0	$0	$0	$896
DMT Standby Overrun Charges	$0	$0	$0	$0	$340	$226	$0	$330	$0	$0	$173	$0	$1,068
Overdelivery Charges	$22,180	$23,782	$19,894	$20,673	$20,645	$16,477	$18,132	$17,336	$15,254	$18,084	$16,485	$11,016	$219,956
Total Gas Cost Revenues	$18,129	$23,165	$19,206	$19,790	$21,371	$17,194	$17,209	$19,840	$14,734	$17,655	$17,656	$10,537	$216,486
Total Revenues	$163,093	$186,886	$200,496	$249,767	$286,150	$262,222	$259,091	$204,727	$157,027	$136,992	$156,530	$143,680	$2,406,661

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
HISTORIC TEST YEAR ACTUAL BILLED REVENUES
TWELVE MONTHS ENDED SEPTEMBER 30, 2025

LIS DMT Negotiated	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	10	10	10	10	10	10	10	10	10	10	10	10	120
Transportation Volumes	587,209	606,268	655,915	711,269	827,660	737,595	770,674	612,741	579,840	527,486	581,920	551,544	7,750,120
Sales - Mcf	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Volume	587,209	606,268	655,915	711,269	827,660	737,595	770,674	612,741	579,840	527,486	581,920	551,544	7,750,120
Base Non Gas Cost Rate Revenue:													
Minimum Bill	$11,650	$11,650	$11,650	$11,650	$11,650	$11,650	$11,650	$11,650	$11,650	$11,650	$11,650	$11,650	$139,800
Transportation Volumes	$184,459	$190,153	$198,111	$214,681	$238,082	$213,884	$222,090	$181,733	$169,246	$170,937	$176,042	$174,714	$2,334,132
Sales - Mcf	$0	$0	$0	$313	$1,617	$222	$0	$0	$0	$0	$0	$0	$2,152
Revenue Rounding	$0	$0	$0	($0)	$0	($0)	$0	$0	$0	$0	$0	$0	($0)
Rider B - State Tax Adjustment	$0	($172)	($179)	($194)	($217)	($194)	($209)	($173)	($162)	($164)	($169)	($167)	($2,000)
Rider E - Customer Education	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0	$0
Rider G - Merchant Function Charge	$0	$0	$0	$7	$35	$6	$0	$0	$0	$0	$0	$0	$47
Rider H - Gas Procurement Charge	$0	$0	$0	$60	$310	$43	$0	$0	$0	$0	$0	$0	$413
DSIC - Distribution System Improvement Charge	$0	$0	$0	$0	$221	$192	$195	$453	$451	$511	$979	$962	$3,965
Total Base Non Gas Cost Rate Revenue	$196,109	$201,631	$209,582	$226,517	$251,698	$225,802	$233,726	$193,663	$181,184	$182,935	$188,503	$187,159	$2,478,510
Gas Cost Revenues:													
Rider A - Natural Gas Supply Charge	$0	$0	$0	$2,351	$12,134	$1,873	$0	$0	$0	$0	$0	$0	$16,359
Rider A - Distribution Charge	$0	$0	$0	$180	$928	$131	$0	$0	$0	$0	$0	$0	$1,239
Rider A - Gas Adjustment Charge	$0	$0	$0	($335)	($1,731)	($237)	$0	$0	$0	$0	$0	$0	($2,303)
Rider I - OPEB Surcredit	($8,859)	($7,967)	($8,569)	($9,305)	($10,718)	($9,488)	($10,759)	($8,554)	($8,095)	($7,364)	($8,124)	($7,700)	($105,500)
Tax Cuts & Jobs Act Refund	($1,129)	$6,592	$7,089	$7,698	$8,880	$7,850	$8,901	$7,077	$6,697	$6,092	$6,721	$6,370	$78,840
Market Rate Differential	$0	$0	$0	$0	$2,419	$1,466	$0	$0	$0	$0	$0	$0	$3,884
DMT Standby Overrun Charges	$0	$0	$0	$644	$3,327	$509	$0	$0	$0	$0	$0	$0	$4,480
Overdelivery Charges	$48,472	$40,364	$42,882	$43,959	$56,242	$68,822	$49,932	$58,684	$60,397	$57,408	$47,832	$46,951	$621,945
Total Gas Cost Revenues	$38,484	$38,989	$41,403	$45,193	$71,481	$70,926	$48,074	$57,207	$59,000	$56,136	$46,430	$45,622	$618,944
Total Revenues	$234,593	$240,619	$250,985	$271,710	$323,179	$296,728	$281,801	$250,870	$240,185	$239,071	$234,932	$232,781	$3,097,454

NATIONAL FUEL EXHIBIT CTM-6

NORMALIZED HISTORIC TEST YEAR

CURRENT RATES

National Fuel Gas Distribution Corporation
Pennsylvania Division
Normalized Historic Test Year Ended September 30, 2025
Summary of Revenues (Current Rates)

	Account	Total Revenue	Total Gas Cost	Total Delivery
Gas Sales				
Residential	480	159,999,067	76,789,695	83,209,372
Commercial/Public Authority	481	27,465,986	15,387,314	12,078,672
Industrial	481	1,982,549	1,241,737	740,812
Subtotal		189,447,603	93,418,746	96,028,857
Transportation				
Residential	489	9,076,141	517,530	8,558,611
Commercial/Public Authority	489	17,057,478	2,243,155	14,814,323
Industrial	489	13,861,427	1,204,682	12,656,745
Subtotal		39,995,046	3,965,367	36,029,679
Total Billed Revenue		229,442,649	97,384,113	132,058,536
Other Operating Revenues				
Forfeited Discounts	487	1,130,835	0	1,130,835
Rent From Gas Property	493	100,267	0	100,267
Other Gas Revenues	495	47,653	0	47,653
Subtotal		1,278,755	0	1,278,755
Total Operating Revenue		230,721,404	97,384,113	133,337,291

National Fuel Gas Distribution Corporation
Pennsylvania Division
Normalized Historic Test Year Ended September 30, 2025
Summary of Revenues by Service Class (Current Rates)

	Account	Reference (CTM-7, Sch. 4)	Average Customers	Total Usage (Mcf)	Total Revenue	Total Gas Cost	Total Delivery
Residential Sales	480	Page 1	172,195	16,169,581	154,392,536	74,090,278	80,302,258
Residential CAP	480	Page 2	5,828	607,145	5,606,531	2,699,417	2,907,114
Residential SATC	489	Page 3	18,045	1,712,357	8,609,147	463,746	8,145,401
Residential MMT	489	Page 4	498	110,652	466,994	53,784	413,210
Total Residential			196,566	18,599,735	169,075,209	77,307,225	91,767,984
SCPA < 250 Sales	481	Page 5	8,578	957,108	9,508,330	4,375,516	5,132,814
SCPA < 250 SATC	489	Page 6	730	90,131	481,801	35,593	446,208
SCPA < 250 MMT	489	Page 7	1,152	161,947	829,985	80,412	749,573
SCPA > 250 Sales	481	Page 8	2,720	1,330,563	10,162,185	6,026,810	4,135,375
SCPA > 250 SATC	489	Page 9	313	156,376	514,830	52,156	462,674
SCPA > 250 MMT	489	Page 10	1,248	729,636	2,375,035	310,869	2,064,166
LCPA	481	Page 11	452	970,223	7,034,816	4,461,820	2,572,996
LCPA SATC	489	Page 12	46	87,049	260,808	30,992	229,816
LCPA MMT	489	Page 13	988	4,502,690	11,124,514	1,797,950	9,326,564
LCPA DMT	489	Page 14	13	903,240	1,470,504	(64,817)	1,535,321
Natural Gas Vechicles	481	Page 15	7	108,656	760,656	523,168	237,488
Total Commercial & Public Authority			16,247	9,997,619	44,523,464	17,630,469	26,892,995
SVIS Sales	481	Page 16	126	62,396	549,053	286,545	262,508
SVIS SATC	489	Page 17	11	4,081	20,951	1,715	19,236
SVIS MMT	489	Page 18	64	45,129	181,280	24,354	156,926
IVIS Sales	481	Page 19	55	210,506	1,433,497	955,192	478,305
IVIS SATC	489	Page 20	3	6,665	20,535	1,961	18,574
IVIS MMT	489	Page 21	263	2,209,460	4,751,685	984,946	3,766,739
IVIS DMT	489	Page 22	25	714,082	1,016,282	(18,809)	1,035,091
LVIS MMT	489	Page 23	8	492,363	823,456	216,407	607,049
LVIS DMT	489	Page 24	20	1,828,242	2,069,869	(61,629)	2,131,498
LIS MMT	489	Page 25	1	365,892	407,056	172,168	234,888
LIS DMT	489	Page 26	10	3,418,371	2,187,256	(8,238)	2,195,494
LIS DMT Negotiated	489	Page 27	10	7,750,120	2,383,057	(108,193)	2,491,250
Total Industrial			594	17,107,308	15,843,976	2,446,419	13,397,557
Grand Total			**213,407**	**45,704,661**	**229,442,649**	**97,384,113**	**132,058,536**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Normalized Historic Test Year Ended September 30, 2025
Summary of Revenues by Service Class (Current Rates)

	Account	Reference (CTM-7, Sch. 4)	Basic Service Charge	Distribution Charge	Rider B	DSIC	Rider E	Rider G	Rider H	Total Delivery
Residential Sales	480	Page 1	28,928,774	47,880,353	(72,335)	489,357	0	1,218,224	1,857,885	80,302,258
Residential CAP	480	Page 2	979,069	1,797,840	(2,618)	17,348	0	45,714	69,761	2,907,114
Residential SATC	489	Page 3	3,031,490	5,070,525	(7,338)	50,725	0	0	0	8,145,401
Residential MMT	489	Page 4	83,678	327,652	(373)	2,253	0	0	0	413,210
Total Residential			33,023,011	55,076,369	(82,664)	559,683	0	1,263,938	1,927,646	91,767,984
SCPA < 250 Sales	481	Page 5	2,779,286	2,200,811	(4,623)	33,785	0	13,583	109,972	5,132,814
SCPA < 250 SATC	489	Page 6	236,534	207,251	(401)	2,825	0	0	0	446,208
SCPA < 250 MMT	489	Page 7	373,086	372,381	(673)	4,779	0	0	0	749,573
SCPA > 250 Sales	481	Page 8	1,207,458	2,734,972	(3,726)	24,817	0	18,972	152,882	4,135,375
SCPA > 250 SATC	489	Page 9	138,898	321,431	(416)	2,761	0	0	0	462,674
SCPA > 250 MMT	489	Page 10	554,001	1,499,767	(1,859)	12,258	0	0	0	2,064,166
LCPA	481	Page 11	819,628	1,612,727	(2,316)	17,494	0	13,984	111,479	2,572,996
LCPA SATC	489	Page 12	83,881	144,695	(208)	1,449	0	0	0	229,816
LCPA MMT	489	Page 13	1,790,558	7,484,371	(8,403)	60,037	0	0	0	9,326,564
LCPA DMT	489	Page 14	24,311	1,501,365	(1,382)	11,028	0	0	0	1,535,321
Natural Gas Vechicles	481	Page 15	0	235,798	(213)	1,903	0	0	0	237,488
Total Commercial & Public Authority			8,007,640	18,315,568	(24,220)	173,136	0	46,539	374,332	26,892,995
SVIS Sales	481	Page 16	123,738	129,298	(235)	1,653	0	885	7,169	262,508
SVIS SATC	489	Page 17	10,660	8,457	(17)	137	0	0	0	19,236
SVIS MMT	489	Page 18	62,484	93,516	(141)	1,067	0	0	0	156,926
IVIS Sales	481	Page 19	167,454	280,962	(432)	3,102	0	3,032	24,187	478,305
IVIS SATC	489	Page 20	9,576	8,896	(19)	121	0	0	0	18,574
IVIS MMT	489	Page 21	793,926	2,948,967	(3,393)	27,239	0	0	0	3,766,739
IVIS DMT	489	Page 22	75,096	953,086	(933)	7,842	0	0	0	1,035,091
LVIS MMT	489	Page 23	98,208	504,327	(547)	5,061	0	0	0	607,049
LVIS DMT	489	Page 24	245,009	1,872,668	(1,921)	15,742	0	0	0	2,131,498
LIS MMT	489	Page 25	13,980	219,279	(210)	1,839	0	0	0	234,888
LIS DMT	489	Page 26	132,810	2,048,629	(1,975)	16,030	0	0	0	2,195,494
LIS DMT Negotiated	489	Page 27	139,800	2,334,156	(2,245)	19,539	0	0	0	2,491,250
Total Industrial			1,872,741	11,402,241	(12,068)	99,370	0	3,917	31,356	13,397,557
Grand Total			**42,903,391**	**84,794,179**	**(118,952)**	**832,189**	**0**	**1,314,394**	**2,333,334**	**132,058,536**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Normalized Historic Test Year Ended September 30, 2025
Detailed Billed Revenue Workpapers (Current Rates)

Residential Sales Service	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	172,198	172,172	172,832	173,303	173,146	173,231	172,969	172,212	171,733	171,229	170,732	170,588	2,066,341
Total Volume	543,831	1,163,392	2,240,364	2,882,081	2,898,653	2,525,295	1,823,589	1,023,732	401,382	210,689	210,129	246,444	16,169,581
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96110	$2.96110	$2.96114
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.06505	$0.06910	$0.06910	$0.06910	$0.07922	$0.07922	$0.07922	$0.07922	$0.07922	$0.07922	$0.09800	$0.09800	$0.07534
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.61%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$2,410,765	$2,410,408	$2,419,641	$2,426,235	$2,424,037	$2,425,227	$2,421,559	$2,410,961	$2,404,255	$2,397,206	$2,390,248	$2,388,232	$28,928,774
Volumetric Distribution Charge	1,610,338	3,444,967	6,634,031	8,534,245	8,583,317	7,477,752	5,399,902	3,031,414	1,188,548	623,880	622,213	729,745	47,880,353
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	35,377	80,387	154,802	199,143	229,642	200,063	144,471	81,104	31,799	16,692	20,593	24,152	1,218,224
Rider H - Gas Procurement Charge	62,486	133,674	257,418	331,151	333,055	290,156	209,530	117,627	46,119	24,208	24,144	28,316	1,857,885
DSIC - Distribution System Improvement Charge	0	0	0	47,112	47,437	42,612	82,572	56,975	37,074	57,872	57,781	59,921	489,357
Total Base Non Gas Cost Rate Revenue	$4,118,967	$6,069,435	$9,465,892	$11,537,886	$11,617,488	$10,435,810	$8,258,035	$5,698,080	$3,707,795	$3,119,857	$3,114,979	$3,230,367	$80,374,593
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37546
Natural Gas Supply Charge ($/Mcf) - Rider A	$4.34390	$4.47320	$4.47320	$4.47320	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.21260	$5.21260	$4.79826
Gas Adjustment Charge ($/Mcf) - Rider A	($0.73630)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	$0.22230	$0.22230	($0.62011)
Rider F - CAP Discount Charge	$0.13960	$0.11790	$0.11790	$0.11790	$0.14600	$0.14600	$0.14600	$0.13390	$0.13390	$0.13390	$0.13140	$0.13140	$0.02354
OPEB Surcredit ($/Mcf) - Rider I	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)
TCJA Surcredit ($/Mcf)	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$198,390	$427,663	$823,558	$1,059,453	$1,095,691	$954,562	$689,317	$386,971	$151,722	$79,640	$93,907	$110,136	$6,071,010
Natural Gas Supply Charge ($/Mcf) - Rider A	2,362,347	5,204,085	10,021,596	12,892,125	14,594,138	12,714,355	9,181,406	5,154,286	2,020,878	1,060,777	1,095,318	1,284,614	77,585,925
Gas Adjustment Charge ($/Mcf) - Rider A	(400,423)	(746,083)	(1,436,745)	(1,848,279)	(1,858,906)	(1,619,472)	(1,169,468)	(656,519)	(257,406)	(135,115)	46,712	54,785	(10,026,919)
Rider F - CAP Discount Charge	75,919	137,164	264,139	339,797	423,203	368,693	266,244	137,078	53,745	28,211	27,611	32,383	2,154,187
OPEB Surcredit - Rider I	(120,595)	(257,982)	(496,801)	(639,101)	(642,776)	(559,984)	(404,381)	(227,013)	(89,006)	(46,720)	(46,596)	(54,649)	(3,585,604)
TCJA Surcredit	63,623	136,105	262,100	337,175	339,113	295,434	213,342	119,766	46,958	24,649	24,583	28,831	1,891,679
Total Gas Cost Revenues	$2,179,261	$4,900,952	$9,437,847	$12,141,170	$13,950,463	$12,153,588	$8,776,460	$4,914,569	$1,926,891	$1,011,442	$1,241,535	$1,456,100	$74,090,278
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($3,707)	($5,462)	($8,519)	($10,384)	($10,456)	($9,392)	($7,432)	($5,128)	($3,337)	($2,808)	($2,803)	($2,907)	($72,335)
Total Revenues	$6,294,520	$10,964,925	$18,895,220	$23,668,673	$25,557,496	$22,580,007	$17,027,063	$10,607,521	$5,631,349	$4,128,491	$4,353,711	$4,683,560	$154,392,536
Unit Margin ($/Mcf)	$7.5740	$5.2170	$4.2252	$4.0033	$4.0079	$4.1325	$4.5285	$5.5660	$9.2376	$14.8079	$14.8241	$13.1079	$4.9707

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

Residential CAP	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	5,791	5,931	5,920	5,925	5,975	5,971	5,928	5,839	5,708	5,614	5,649	5,685	69,934
Total Volume	19,228	44,777	84,399	107,995	108,724	95,035	68,142	38,977	16,507	7,998	7,089	8,274	607,145
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96110	$2.96110	$2.96114
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.06505	$0.06910	$0.06910	$0.06910	$0.07922	$0.07922	$0.07922	$0.07922	$0.07922	$0.07922	$0.09800	$0.09800	$0.07529
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.60%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$81,074	$83,034	$82,873	$82,943	$83,650	$83,594	$82,985	$81,746	$79,905	$78,589	$79,086	$79,590	$979,069
Volumetric Distribution Charge	56,936	132,591	249,917	319,788	321,947	281,412	201,778	115,416	48,880	23,683	20,991	24,500	1,797,840
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	1,251	3,094	5,832	7,462	8,614	7,529	5,398	3,088	1,308	634	695	811	45,714
Rider H - Gas Procurement Charge	2,209	5,145	9,697	12,409	12,492	10,920	7,830	4,478	1,897	919	815	951	69,761
DSIC - Distribution System Improvement Charge	0	0	0	1,733	1,749	1,572	3,010	2,068	1,333	1,962	1,920	2,001	17,348
Total Base Non Gas Cost Rate Revenue	$141,470	$223,864	$348,319	$424,335	$428,452	$385,027	$301,001	$206,796	$133,322	$105,787	$103,506	$107,852	$2,909,732
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37526
Natural Gas Supply Charge ($/Mcf) - Rider A	$4.34390	$4.47320	$4.47320	$4.47320	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.21260	$5.21260	$4.79804
Gas Adjustment Charge ($/Mcf) - Rider A	($0.73630)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	$0.22230	$0.22230	($0.62246)
OPEB Surcredit ($/Mcf) - Rider I	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)
TCJA Surcredit ($/Mcf)	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$7,014	$16,460	$31,025	$39,699	$41,098	$35,923	$25,758	$14,733	$6,240	$3,023	$3,168	$3,698	$227,839
Natural Gas Supply Charge ($/Mcf) - Rider A	83,525	200,296	377,534	483,083	547,404	478,482	343,081	196,241	83,109	40,268	36,952	43,129	2,913,104
Gas Adjustment Charge ($/Mcf) - Rider A	(14,158)	(28,715)	(54,125)	(69,257)	(69,725)	(60,946)	(43,699)	(24,996)	(10,586)	(5,129)	1,576	1,839	(377,921)
OPEB Surcredit - Rider I	(4,264)	(9,929)	(18,715)	(23,948)	(24,110)	(21,074)	(15,110)	(8,643)	(3,660)	(1,774)	(1,572)	(1,835)	(134,634)
TCJA Surcredit	2,249	5,238	9,874	12,634	12,720	11,118	7,972	4,560	1,931	936	829	968	71,029
Total Gas Cost Revenues	$74,366	$183,350	$345,593	$442,211	$507,387	$443,503	$318,002	$181,895	$77,034	$37,324	$40,953	$47,799	$2,699,417
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($127)	($201)	($313)	($382)	($386)	($347)	($271)	($186)	($120)	($95)	($93)	($97)	($2,618)
Total Revenues	$215,709	$407,013	$693,599	$866,164	$935,453	$828,183	$618,732	$388,505	$210,236	$143,016	$144,366	$155,554	$5,606,531
Unit Margin ($/Mcf)	$7.3575	$4.9995	$4.1271	$3.9292	$3.9407	$4.0514	$4.4173	$5.3056	$8.0767	$13.2267	$14.6010	$13.0351	$4.7925

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

Residential SATC	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	17,176	17,380	17,598	17,894	18,150	18,295	18,332	18,340	18,376	18,351	18,300	18,346	216,535
Total Volume	53,793	117,990	232,398	302,375	309,888	272,004	197,865	110,014	44,791	22,457	22,406	26,376	1,712,357
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96110	$2.96110	$2.96114
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.63%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$240,457	$243,313	$246,372	$250,516	$254,100	$256,130	$256,641	$256,760	$257,257	$256,907	$256,193	$256,844	$3,031,490
Volumetric Distribution Charge	159,286	349,385	688,163	895,375	917,622	805,442	585,906	325,767	132,632	66,498	66,346	78,102	5,070,525
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	4,698	4,804	4,352	8,510	5,884	3,938	6,112	6,096	6,330	50,725
Total Base Non Gas Cost Rate Revenue	$399,743	$592,698	$934,535	$1,150,589	$1,176,526	$1,065,924	$851,057	$588,410	$393,827	$329,518	$328,635	$341,276	$8,152,739
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37558
TCJA Surcredit ($/Mcf)	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699
OPEB Surcredit ($/Mcf) - Rider I	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$19,624	$43,373	$85,430	$111,153	$117,138	$102,818	$74,793	$41,585	$16,931	$8,489	$10,013	$11,787	$643,134
TCJA Surcredit	6,293	13,804	27,188	35,375	36,254	31,822	23,148	12,871	5,240	2,627	2,621	3,086	200,329
OPEB Surcredit - Rider I	(11,929)	(26,164)	(51,534)	(67,052)	(68,718)	(60,317)	(43,877)	(24,396)	(9,932)	(4,980)	(4,969)	(5,849)	(379,717)
Total Gas Cost Revenues	$13,988	$31,013	$61,084	$79,476	$84,674	$74,323	$54,064	$30,060	$12,239	$6,136	$7,665	$9,024	$463,746
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($360)	($533)	($841)	($1,036)	($1,059)	($959)	($766)	($530)	($354)	($297)	($296)	($307)	($7,338)
Total Revenues	$413,371	$623,178	$994,778	$1,229,029	$1,260,141	$1,139,288	$904,355	$617,940	$405,712	$335,357	$336,004	$349,993	$8,609,147
Unit Margin ($/Mcf)	$7.4311	$5.0233	$4.0213	$3.8052	$3.7966	$3.9188	$4.3012	$5.3485	$8.7926	$14.6733	$14.6673	$12.9389	$4.7611

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

Residential MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	503	498	497	492	494	493	498	504	502	502	498	498	5,977
Total Volume	2,820	7,442	15,242	19,391	21,031	18,583	13,882	7,322	2,572	776	712	879	110,652
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.55%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	7,042	6,972	6,951	6,888	6,916	6,902	6,972	7,056	7,021	7,021	6,972	6,965	83,678
Volumetric Distribution Charge	8,350	22,037	45,133	57,419	62,275	55,026	41,106	21,681	7,616	2,298	2,108	2,603	327,652
DSIC - Distribution System Improvement Charge	0	0	0	264	284	254	486	290	148	176	172	181	2,253
Total Base Non Gas Cost Rate Revenue	$15,392	$29,009	$52,084	$64,570	$69,475	$62,182	$48,564	$29,027	$14,785	$9,495	$9,252	$9,749	$413,583
Gas Cost Rates:													
MMT Gas Cost Charge	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.49000	$0.49000	$0.47030
OPEB Surcredit ($/Mcf) - Rider I	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06751)
TCJA Surcredit ($/Mcf)	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327
Gas Cost Revenues													
MMT Gas Cost Charge	$1,325	$3,498	$7,164	$9,114	$9,885	$8,734	$6,525	$3,441	$1,209	$365	$349	$431	$52,040
OPEB Surcredit - Rider I	($190)	($503)	($1,029)	($1,309)	($1,420)	($1,255)	($937)	($494)	($174)	($52)	($48)	($59)	($7,470)
TCJA Surcredit	235	620	1,269	1,615	1,751	1,547	1,156	610	214	65	59	73	9,214
Total Gas Cost Revenues	$1,370	$3,615	$7,404	$9,420	$10,216	$9,026	$6,744	$3,557	$1,249	$378	$360	$445	$53,784
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($14)	($26)	($47)	($58)	($63)	($56)	($44)	($26)	($13)	($9)	($8)	($9)	($373)
Total Revenues	$16,748	$32,598	$59,441	$73,932	$79,628	$71,152	$55,264	$32,558	$16,021	$9,864	$9,604	$10,185	$466,994
Unit Margin ($/Mcf)	$5.4583	$3.8979	$3.4171	$3.3299	$3.3034	$3.3462	$3.4983	$3.9644	$5.7484	$12.2357	$12.9943	$11.0906	$3.7377

National Fuel Gas Distribution Corporation
Pennsylvania Division
Normalized Historic Test Year Ended September 30, 2025
Detailed Billed Revenue Workpapers (Current Rates)

SCPA < 250 Sales	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	8,357	8,395	8,505	8,578	8,624	8,794	8,766	8,711	8,588	8,562	8,535	8,526	102,937
Total Volume	20,704	58,226	126,182	178,738	201,420	174,344	115,070	54,302	11,420	4,627	4,655	7,420	957,108
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29940	$2.29940	$2.29944
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01226	$0.01302	$0.01302	$0.01302	$0.01493	$0.01493	$0.01493	$0.01493	$0.01493	$0.01493	$0.01847	$0.01847	$0.01419
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.66%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$225,626	$226,652	$229,622	$231,593	$232,835	$237,425	$236,669	$235,197	$231,876	$231,174	$230,432	$230,189	$2,779,286
Volumetric Distribution Charge	47,607	133,887	290,148	410,997	463,153	400,894	264,597	124,864	26,260	10,640	10,704	17,062	2,200,811
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	254	758	1,643	2,327	3,007	2,603	1,718	811	170	69	86	137	13,583
Rider H - Gas Procurement Charge	2,379	6,690	14,498	20,537	23,143	20,032	13,222	6,239	1,312	532	535	853	109,972
DSIC - Distribution System Improvement Charge	0	0	0	2,728	2,961	2,710	5,214	3,708	2,622	4,582	4,569	4,692	33,785
Total Base Non Gas Cost Rate Revenue	$275,865	$367,987	$535,911	$668,182	$725,099	$663,663	$521,418	$370,819	$262,240	$246,996	$246,325	$252,931	$5,137,437
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37464
Natural Gas Supply Charge ($/Mcf) - Rider A	$4.34390	$4.47320	$4.47320	$4.47320	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.21260	$5.21260	$4.80901
Gas Adjustment Charge ($/Mcf) - Rider A	($0.73630)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	$0.22230	$0.22230	($0.63246)
OPEB Surcredit ($/Mcf) - Rider I	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)
TCJA Surcredit ($/Mcf)	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$7,553	$21,404	$46,385	$65,704	$76,137	$65,902	$43,496	$20,526	$4,317	$1,749	$2,080	$3,316	$358,569
Natural Gas Supply Charge ($/Mcf) - Rider A	89,936	260,457	564,437	799,531	1,014,109	877,787	579,354	273,400	57,497	23,296	24,265	38,677	$4,602,746
Gas Adjustment Charge ($/Mcf) - Rider A	(15,244)	(37,340)	(80,921)	(114,625)	(129,171)	(111,807)	(73,794)	(34,824)	(7,324)	(2,967)	1,035	1,649	($605,333)
TCJA Surcredit	2,614	7,352	15,933	22,569	25,433	22,014	14,530	6,857	1,442	584	588	937	120,853
OPEB Surcredit - Rider I	(2,192)	(6,164)	(13,358)	(18,921)	(21,322)	(18,456)	(12,181)	(5,748)	(1,209)	(490)	(493)	(785)	(101,319)
Total Gas Cost Revenues	$82,667	$245,709	$532,476	$754,258	$965,186	$835,440	$551,405	$260,211	$54,723	$22,172	$27,475	$43,794	$4,375,516
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($248)	($331)	($482)	($601)	($653)	($597)	($469)	($334)	($236)	($222)	($222)	($228)	($4,623)
Total Revenues	$358,284	$613,365	$1,067,905	$1,421,839	$1,689,632	$1,498,506	$1,072,354	$630,696	$316,727	$268,946	$273,578	$296,497	$9,508,330
Unit Margin ($/Mcf)	$13.3242	$6.3200	$4.2471	$3.7383	$3.5999	$3.8066	$4.5313	$6.8288	$22.9633	$53.3814	$52.9163	$34.0878	$5.3677

National Fuel Gas Distribution Corporation
Pennsylvania Division
Normalized Historic Test Year Ended September 30, 2025
Detailed Billed Revenue Workpapers (Current Rates)

SCPA < 250 SATC	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	768	763	761	759	760	753	735	715	700	695	682	673	8,761
Total Volume	2,329	5,642	11,963	17,285	18,375	16,499	10,286	5,210	1,010	436	432	664	90,131
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29940	$2.29940	$2.29944
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.64%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$20,723	$20,588	$20,534	$20,493	$20,507	$20,318	$19,845	$19,292	$18,887	$18,765	$18,414	$18,171	$236,534
Volumetric Distribution Charge	5,355	12,973	27,508	39,746	42,252	37,938	23,652	11,980	2,322	1,003	993	1,527	207,251
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	247	257	239	439	316	214	374	367	372	2,825
Total Base Non Gas Cost Rate Revenue	$26,078	$33,561	$48,042	$60,486	$63,016	$58,495	$43,936	$31,587	$21,423	$20,141	$19,774	$20,070	$446,609
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37449
TCJA Surcredit ($/Mcf)	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12628
OPEB Surcredit ($/Mcf) - Rider I	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10587)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$850	$2,074	$4,398	$6,354	$6,946	$6,237	$3,888	$1,969	$382	$165	$193	$297	$33,753
TCJA Surcredit	294	712	1,511	2,183	2,320	2,083	1,299	658	128	55	55	84	11,382
OPEB Surcredit - Rider I	(247)	(597)	(1,266)	(1,830)	(1,945)	(1,747)	(1,089)	(552)	(107)	(46)	(46)	(70)	(9,542)
Total Gas Cost Revenues	$897	$2,189	$4,643	$6,707	$7,321	$6,573	$4,098	$2,075	$403	$174	$202	$311	$35,593
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($23)	($30)	($43)	($54)	($57)	($53)	($40)	($28)	($19)	($18)	($18)	($18)	($401)
Total Revenues	$26,952	$35,720	$52,642	$67,139	$70,280	$65,015	$47,994	$33,634	$21,807	$20,297	$19,958	$20,363	$481,801
Unit Margin ($/Mcf)	$11.1970	$5.9484	$4.0159	$3.4993	$3.4294	$3.5454	$4.2715	$6.0628	$21.2110	$46.1953	$45.7735	$30.2260	$4.9551

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

SCPA < 250 MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	1,156	1,165	1,167	1,168	1,139	1,130	1,128	1,119	1,168	1,164	1,162	1,155	13,818
Total Volume	4,543	10,540	21,677	31,157	34,837	27,309	17,463	8,267	2,609	1,256	986	1,303	161,947
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.64%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	31,212	31,442	31,496	31,536	30,740	30,510	30,456	30,200	31,536	31,428	31,361	31,172	373,086
Volumetric Distribution Charge	10,446	24,236	49,844	71,642	80,104	62,794	40,154	19,009	5,999	2,888	2,267	2,996	372,381
DSIC - Distribution System Improvement Charge	0	0	0	423	454	383	713	497	379	649	636	646	4,779
Total Base Non Gas Cost Rate Revenue	$41,658	$55,677	$81,340	$103,601	$111,298	$93,687	$71,324	$49,706	$37,914	$34,965	$34,263	$34,813	$750,246
Gas Cost Rates:													
MMT Gas Cost Charge	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.49000	$0.49000	$0.47027
TCJA Surcredit ($/Mcf)	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983
OPEB Surcredit ($/Mcf) - Rider I	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)
Gas Cost Revenues													
MMT Gas Cost Charge	$2,135	$4,954	$10,188	$14,644	$16,373	$12,835	$8,208	$3,885	$1,226	$590	$483	$638	$76,159
TCJA Surcredit	499	1,158	2,381	3,422	3,826	2,999	1,918	908	287	138	108	143	17,787
OPEB Surcredit - Rider I	(380)	(881)	(1,812)	(2,604)	(2,911)	(2,282)	(1,459)	(691)	(218)	(105)	(82)	(109)	(13,534)
Total Gas Cost Revenues	$2,254	$5,231	$10,757	$15,462	$17,288	$13,552	$8,667	$4,102	$1,295	$623	$509	$672	$80,412
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($37)	($50)	($73)	($93)	($100)	($84)	($64)	($45)	($34)	($31)	($31)	($31)	($673)
Total Revenues	$43,875	$60,858	$92,024	$118,970	$128,486	$107,155	$79,927	$53,763	$39,175	$35,557	$34,741	$35,454	$829,985
Unit Margin ($/Mcf)	$9.1697	$5.2825	$3.7523	$3.3251	$3.1948	$3.4306	$4.0843	$6.0125	$14.5321	$27.8381	$34.7498	$26.7179	$4.6327

National Fuel Gas Distribution Corporation
Pennsylvania Division
Normalized Historic Test Year Ended September 30, 2025
Detailed Billed Revenue Workpapers (Current Rates)

SCPA > 250 Sales	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	2,720	2,732	2,747	2,764	2,771	2,691	2,698	2,711	2,702	2,698	2,701	2,702	32,634
Total Volume	41,346	87,512	172,052	233,096	245,897	215,574	151,720	88,288	29,869	20,532	20,704	23,973	1,330,563
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01226	$0.01302	$0.01302	$0.01302	$0.01493	$0.01493	$0.01493	$0.01493	$0.01493	$0.01493	$0.01847	$0.01847	$0.01426
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.60%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$100,640	$101,084	$101,621	$102,250	$102,509	$99,567	$99,808	$100,307	$99,956	$99,826	$99,919	$99,974	$1,207,458
Volumetric Distribution Charge	84,987	179,881	353,653	479,129	505,441	443,112	311,860	181,476	61,396	42,204	42,557	49,277	2,734,972
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	507	1,139	2,240	3,035	3,671	3,218	2,265	1,318	446	307	382	443	18,972
Rider H - Gas Procurement Charge	4,751	10,055	19,769	26,783	28,254	24,769	17,433	10,144	3,432	2,359	2,379	2,755	152,882
DSIC - Distribution System Improvement Charge	0	0	0	2,506	2,623	2,340	4,357	2,962	1,669	2,735	2,745	2,881	24,817
Total Base Non Gas Cost Rate Revenue	$190,884	$292,160	$477,282	$613,702	$642,498	$573,007	$435,722	$296,207	$166,898	$147,430	$147,982	$155,329	$4,139,101
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37605
Natural Gas Supply Charge ($/Mcf) - Rider A	$4.34390	$4.47320	$4.47320	$4.47320	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.21260	$5.21260	$4.81136
Gas Adjustment Charge ($/Mcf) - Rider A	($0.73630)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	$0.22230	$0.22230	($0.61526)
TCJA Surcredit ($/Mcf)	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507
OPEB Surcredit ($/Mcf) - Rider I	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$15,083	$32,169	$63,246	$85,686	$92,949	$81,487	$57,350	$33,373	$11,290	$7,761	$9,253	$10,714	$500,361
Natural Gas Supply Charge ($/Mcf) - Rider A	179,603	391,459	769,623	1,042,685	1,238,042	1,085,372	763,880	444,512	150,384	103,375	107,922	124,962	6,401,819
Gas Adjustment Charge ($/Mcf) - Rider A	(30,443)	(56,121)	(110,337)	(149,484)	(157,694)	(138,248)	(97,298)	(56,619)	(19,155)	(13,167)	4,602	5,329	(818,635)
TCJA Surcredit	3,104	6,570	12,916	17,499	18,459	16,183	11,390	6,628	2,242	1,541	1,554	1,800	99,886
OPEB Surcredit - Rider I	(4,867)	(10,301)	(20,252)	(27,438)	(28,945)	(25,375)	(17,859)	(10,392)	(3,516)	(2,417)	(2,437)	(2,822)	(156,621)
Total Gas Cost Revenues	$162,480	$363,776	$715,196	$968,948	$1,162,811	$1,019,419	$717,463	$417,502	$141,245	$97,093	$120,894	$139,983	$6,026,810
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($172)	($263)	($430)	($552)	($578)	($516)	($392)	($267)	($150)	($133)	($133)	($140)	($3,726)
Total Revenues	$353,192	$655,673	$1,192,048	$1,582,098	$1,804,731	$1,591,910	$1,152,793	$713,442	$307,993	$244,390	$268,743	$295,172	$10,162,185
Unit Margin ($/Mcf)	$4.6168	$3.3385	$2.7741	$2.6328	$2.6129	$2.6581	$2.8719	$3.3550	$5.5877	$7.1805	$7.1475	$6.4793	$3.1108

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Current Rates)

SCPA > 250 SATC	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	330	327	330	323	317	317	317	308	302	299	295	293	3,754
Total Volume	6,112	10,950	20,582	27,093	26,936	25,158	17,087	9,588	3,908	3,095	2,757	3,110	156,376
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.60%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$12,192	$12,099	$12,210	$11,933	$11,711	$11,729	$11,711	$11,378	$11,156	$11,063	$10,897	$10,823	$138,898
Volumetric Distribution Charge	12,563	22,508	42,306	55,690	55,367	51,712	35,122	19,708	8,033	6,362	5,667	6,393	321,431
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	277	275	260	473	314	194	329	313	325	2,761
Total Base Non Gas Cost Rate Revenue	$24,755	$34,607	$54,516	$67,899	$67,352	$63,701	$47,306	$31,400	$19,382	$17,754	$16,877	$17,540	$463,090
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37617
TCJA Surcredit ($/Mcf)	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507
OPEB Surcredit ($/Mcf) - Rider I	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$2,230	$4,025	$7,566	$9,959	$10,182	$9,510	$6,459	$3,624	$1,477	$1,170	$1,232	$1,390	$58,824
TCJA Surcredit	459	822	1,545	2,034	2,022	1,889	1,283	720	293	232	207	233	11,739
OPEB Surcredit - Rider I	(719)	(1,289)	(2,423)	(3,189)	(3,171)	(2,961)	(2,011)	(1,129)	(460)	(364)	(325)	(366)	(18,407)
Total Gas Cost Revenues	$1,970	$3,558	$6,688	$8,804	$9,033	$8,438	$5,731	$3,215	$1,310	$1,038	$1,114	$1,257	$52,156
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($22)	($31)	($49)	($61)	($61)	($57)	($43)	($28)	($17)	($16)	($15)	($16)	($416)
Total Revenues	$26,703	$38,134	$61,155	$76,642	$76,324	$72,082	$52,994	$34,587	$20,675	$18,776	$17,976	$18,781	$514,830
Unit Margin ($/Mcf)	$4.0502	$3.1604	$2.6487	$2.5062	$2.5005	$2.5321	$2.7685	$3.2749	$4.9596	$5.7364	$6.1213	$5.6400	$2.9614

National Fuel Gas Distribution Corporation
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Detailed Billed Revenue Workpapers (Current Rates)

SCPA > 250 MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	1,248	1,254	1,252	1,253	1,252	1,252	1,255	1,240	1,246	1,247	1,241	1,235	14,973
Total Volume	24,939	47,236	92,783	129,843	133,570	116,651	83,809	46,362	18,442	12,605	10,996	12,400	729,636
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.60%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	46,176	46,398	46,324	46,343	46,324	46,324	46,417	45,880	46,084	46,139	45,899	45,695	554,001
Volumetric Distribution Charge	51,262	97,094	190,715	266,892	274,553	239,776	172,269	95,297	37,908	25,910	22,602	25,488	1,499,767
DSIC - Distribution System Improvement Charge	0	0	0	1,284	1,316	1,173	2,209	1,426	848	1,362	1,295	1,345	12,258
Total Base Non Gas Cost Rate Revenue	$97,438	$143,492	$237,039	$314,519	$322,193	$287,273	$220,895	$142,603	$84,839	$73,410	$69,795	$72,529	$2,066,025
Gas Cost Rates:													
MMT Gas Cost Charge	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.49000	$0.49000	$0.47064
TCJA Surcredit ($/Mcf)	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847
OPEB Surcredit ($/Mcf) - Rider I	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)
Gas Cost Revenues													
MMT Gas Cost Charge	$11,721	$22,201	$43,608	$61,026	$62,778	$54,826	$39,390	$21,790	$8,668	$5,924	$5,388	$6,076	$343,396
TCJA Surcredit	1,708	3,234	6,353	8,890	9,146	7,987	5,738	3,174	1,263	863	753	849	49,958
OPEB Surcredit - Rider I	(2,819)	(5,340)	(10,489)	(14,679)	(15,100)	(13,187)	(9,475)	(5,241)	(2,085)	(1,425)	(1,243)	(1,402)	(82,485)
Total Gas Cost Revenues	$10,610	$20,095	$39,472	$55,237	$56,824	$49,626	$35,653	$19,723	$7,846	$5,362	$4,898	$5,523	$310,869
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($88)	($129)	($213)	($283)	($290)	($259)	($199)	($128)	($76)	($66)	($63)	($65)	($1,859)
Total Revenues	$107,960	$163,458	$276,298	$369,473	$378,727	$336,640	$256,349	$162,198	$92,609	$78,706	$74,630	$77,987	$2,375,035
Unit Margin ($/Mcf)	$3.9071	$3.0378	$2.5548	$2.4223	$2.4122	$2.4627	$2.6357	$3.0759	$4.6003	$5.8239	$6.3473	$5.8491	$2.8316

National Fuel Gas Distribution Corporation
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Detailed Billed Revenue Workpapers (Current Rates)

LCPA Sales	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	453	453	461	473	479	457	446	443	444	444	438	440	5,428
Total Volume	36,381	63,926	108,834	141,390	152,957	139,524	111,628	70,115	37,262	52,814	26,516	28,876	970,223
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66224	$1.66224	$1.66224	$1.66224	$1.66224	$1.66224	$1.66220	$1.66220	$1.66222
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01226	$0.01302	$0.01302	$0.01302	$0.01493	$0.01493	$0.01493	$0.01493	$0.01493	$0.01493	$0.01847	$0.01847	$0.01441
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.68%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$68,403	$68,328	$69,536	$71,423	$72,254	$69,007	$67,271	$66,893	$66,969	$67,044	$66,063	$66,440	$819,628
Volumetric Distribution Charge	60,473	106,258	180,904	235,018	254,251	231,922	185,553	116,548	61,938	87,790	44,075	47,998	1,612,727
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	446	832	1,417	1,841	2,284	2,083	1,667	1,047	556	788	490	533	13,984
Rider H - Gas Procurement Charge	4,180	7,345	12,505	16,246	17,575	16,031	12,826	8,056	4,281	6,068	3,047	3,318	111,479
DSIC - Distribution System Improvement Charge	0	0	0	1,331	1,420	1,308	2,700	1,945	1,351	3,056	2,148	2,236	17,494
Total Base Non Gas Cost Rate Revenue	$133,502	$182,763	$264,362	$325,859	$347,783	$320,352	$270,015	$194,489	$135,095	$164,746	$115,822	$120,524	$2,575,312
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37807
Natural Gas Supply Charge ($/Mcf) - Rider A	$4.34390	$4.47320	$4.47320	$4.47320	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.21260	$5.21260	$4.83720
Gas Adjustment Charge ($/Mcf) - Rider A	($0.73630)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	$0.22230	$0.22230	($0.59556)
TCJA Surcredit ($/Mcf)	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236
OPEB Surcredit ($/Mcf) - Rider I	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$13,272	$23,499	$40,007	$51,975	$57,818	$52,740	$42,195	$26,503	$14,085	$19,964	$11,850	$12,905	$366,813
Natural Gas Supply Charge ($/Mcf) - Rider A	158,035	285,954	486,836	632,466	770,108	702,475	562,025	353,015	187,607	265,908	138,217	150,519	4,693,165
Gas Adjustment Charge ($/Mcf) - Rider A	(26,787)	(40,996)	(69,795)	(90,673)	(98,091)	(89,477)	(71,587)	(44,965)	(23,896)	(33,870)	5,895	6,419	(577,823)
TCJA Surcredit	2,633	4,626	7,875	10,231	11,068	10,096	8,077	5,074	2,696	3,822	1,919	2,089	70,206
OPEB Surcredit - Rider I	(3,395)	(5,966)	(10,156)	(13,195)	(14,274)	(13,020)	(10,417)	(6,543)	(3,477)	(4,929)	(2,474)	(2,695)	(90,541)
Total Gas Cost Revenues	$143,758	$267,117	$454,767	$590,804	$726,629	$662,814	$530,293	$333,084	$177,015	$250,895	$155,407	$169,237	$4,461,820
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($120)	($164)	($238)	($293)	($313)	($288)	($243)	($175)	($122)	($148)	($104)	($108)	($2,316)
Total Revenues	$277,140	$449,716	$718,891	$916,370	$1,074,099	$982,878	$800,065	$527,398	$311,988	$415,493	$271,125	$289,653	$7,034,816
Unit Margin ($/Mcf)	$3.6695	$2.8590	$2.4290	$2.3047	$2.2737	$2.2960	$2.4189	$2.7739	$3.6256	$3.1194	$4.3680	$4.1739	$2.6544

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Detailed Billed Revenue Workpapers (Current Rates)

LCPA SATC	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	51	51	51	48	49	45	44	44	45	43	43	43	556
Total Volume	3,777	7,349	11,145	14,105	13,695	12,354	8,494	6,302	2,630	2,835	2,102	2,261	87,049
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66224	$1.66224	$1.66224	$1.66224	$1.66224	$1.66224	$1.66220	$1.66220	$1.66222
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.63%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$7,701	$7,701	$7,701	$7,248	$7,324	$6,795	$6,644	$6,644	$6,720	$6,493	$6,493	$6,418	$83,881
Volumetric Distribution Charge	6,278	12,216	18,525	23,445	22,764	20,535	14,119	10,475	4,372	4,712	3,494	3,758	144,695
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	126	123	112	210	173	112	212	189	192	1,449
Total Base Non Gas Cost Rate Revenue	$13,979	$19,917	$26,226	$30,819	$30,211	$27,442	$20,973	$17,292	$11,203	$11,417	$10,176	$10,368	$230,024
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37698
TCJA Surcredit ($/Mcf)	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236
OPEB Surcredit ($/Mcf) - Rider I	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$1,378	$2,701	$4,097	$5,185	$5,177	$4,670	$3,211	$2,382	$994	$1,072	$939	$1,010	$32,816
TCJA Surcredit	273	532	806	1,021	991	894	615	456	190	205	152	164	6,299
OPEB Surcredit - Rider I	(352)	(686)	(1,040)	(1,316)	(1,278)	(1,153)	(793)	(588)	(245)	(265)	(196)	(211)	(8,123)
Total Gas Cost Revenues	$1,299	$2,547	$3,863	$4,890	$4,890	$4,411	$3,033	$2,250	$939	$1,012	$895	$963	$30,992
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($13)	($18)	($24)	($28)	($27)	($25)	($19)	($16)	($10)	($10)	($9)	($9)	($208)
Total Revenues	$15,265	$22,446	$30,065	$35,681	$35,074	$31,828	$23,987	$19,526	$12,132	$12,419	$11,062	$11,322	$260,808
Unit Margin ($/Mcf)	$3.7011	$2.7101	$2.3532	$2.1850	$2.2060	$2.2213	$2.4691	$2.7439	$4.2598	$4.0272	$4.8410	$4.5856	$2.6425

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LCPA MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	1,007	1,003	1,003	1,001	996	983	978	975	975	977	982	980	11,858
Total Volume	149,560	296,435	532,465	637,115	727,487	621,402	580,528	365,572	183,190	169,051	118,136	121,749	4,502,690
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.65%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	151,982	151,453	151,378	151,076	150,396	148,433	147,678	147,225	147,150	147,527	148,282	147,980	1,790,558
Volumetric Distribution Charge	248,599	492,734	885,063	1,059,013	1,209,229	1,032,894	964,954	607,654	304,498	280,997	196,366	202,371	7,484,371
DSIC - Distribution System Improvement Charge	0	0	0	4,961	5,574	4,843	11,238	7,624	4,562	8,099	6,514	6,622	60,037
Total Base Non Gas Cost Rate Revenue	$400,580	$644,187	$1,036,441	$1,215,049	$1,365,199	$1,186,171	$1,123,869	$762,503	$456,210	$436,623	$351,162	$356,973	$9,334,967
Gas Cost Rates:													
MMT Gas Cost Charge	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.49000	$0.49000	$0.47107
TCJA Surcredit ($/Mcf)	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872
OPEB Surcredit ($/Mcf) - Rider I	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)
Gas Cost Revenues													
MMT Gas Cost Charge	$70,293	$139,324	$250,259	$299,444	$341,919	$292,059	$272,848	$171,819	$86,099	$79,454	$57,887	$59,657	$2,121,062
TCJA Surcredit	7,287	14,442	25,942	31,040	35,443	30,275	28,283	17,811	8,925	8,236	5,756	5,932	219,372
OPEB Surcredit - Rider I	(18,019)	(35,714)	(64,151)	(76,760)	(87,648)	(74,867)	(69,942)	(44,044)	(22,071)	(20,367)	(14,233)	(14,668)	(542,484)
Total Gas Cost Revenues	$59,561	$118,052	$212,050	$253,724	$289,714	$247,467	$231,189	$145,586	$72,953	$67,323	$49,410	$50,921	$1,797,950
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($361)	($580)	($933)	($1,094)	($1,229)	($1,068)	($1,011)	($686)	($411)	($393)	($316)	($321)	($8,403)
Total Revenues	$459,780	$761,659	$1,247,558	$1,467,679	$1,653,684	$1,432,570	$1,354,047	$907,403	$528,752	$503,553	$400,256	$407,573	$11,124,514
Unit Margin ($/Mcf)	$2.6784	$2.1731	$1.9465	$1.9071	$1.8766	$1.9089	$1.9359	$2.0858	$2.4904	$2.5828	$2.9725	$2.9320	$2.0732

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LCPA DMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	14	14	14	14	14	13	13	13	13	13	13	13	161
Total Volume	54,979	67,699	81,230	117,176	100,887	101,604	92,597	76,980	54,279	51,300	53,610	50,898	903,240
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.72%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	2,114	2,114	2,114	2,114	2,114	1,963	1,963	1,963	1,963	1,963	1,963	1,963	24,311
Volumetric Distribution Charge	91,386	112,530	135,021	194,770	167,695	168,887	153,914	127,956	90,222	85,271	89,111	84,602	1,501,365
DSIC - Distribution System Improvement Charge	0	0	0	807	696	700	1,574	1,312	931	1,649	1,721	1,636	11,028
Total Base Non Gas Cost Rate Revenue	$93,500	$114,644	$137,135	$197,692	$170,505	$171,550	$157,452	$131,231	$93,116	$88,883	$92,796	$88,201	$1,536,703
Gas Cost Rates:													
TCJA Surcredit ($/Mcf)	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872
OPEB Surcredit ($/Mcf) - Rider I	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)
Gas Cost Revenues													
TCJA Surcredit	2,679	3,298	3,958	5,709	4,915	4,950	4,511	3,750	2,644	2,499	2,612	2,480	44,005
OPEB Surcredit - Rider I	(6,624)	(8,156)	(9,787)	(14,117)	(12,155)	(12,241)	(11,156)	(9,275)	(6,539)	(6,181)	(6,459)	(6,132)	(108,822)
Total Gas Cost Revenues	($3,945)	($4,858)	($5,829)	($8,408)	($7,240)	($7,291)	($6,645)	($5,525)	($3,895)	($3,682)	($3,847)	($3,652)	($64,817)
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($84)	($103)	($123)	($178)	($153)	($154)	($142)	($118)	($84)	($80)	($84)	($79)	($1,382)
Total Revenues	$89,471	$109,683	$131,183	$189,106	$163,112	$164,105	$150,665	$125,588	$89,137	$85,121	$88,865	$84,470	$1,470,504
Unit Margin ($/Mcf)	$1.7007	$1.6934	$1.6882	$1.6871	$1.6901	$1.6884	$1.7004	$1.7047	$1.7155	$1.7326	$1.7309	$1.7329	$1.7013

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Natural Gas Vehicles	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	7	7	7	7	7	8	6	7	7	7	7	7	84
Total Volume	9,186	10,122	9,492	8,775	9,212	10,783	7,273	8,042	8,455	8,913	8,754	9,649	108,656
Base Non Gas Cost Rate:													
Volumetric Distribution Charge	$2.03680	$2.03680	$2.03680	$2.03680	$2.33700	$2.33700	$2.33700	$2.33700	$2.33700	$2.33700	$1.96470	$1.96470	$2.17013
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.81%
Base Non Gas Cost Rate Revenue:													
Volumetric Distribution Charge	18,710	20,616	19,333	17,873	21,528	25,200	16,997	18,794	19,759	20,830	17,199	18,957	235,798
DSIC - Distribution System Improvement Charge	0	0	0	73	88	103	172	190	200	394	325	358	1,903
Total Base Non Gas Cost Rate Revenue	$18,710	$20,616	$19,333	$17,946	$21,617	$25,303	$17,169	$18,984	$19,959	$21,223	$17,524	$19,316	$237,701
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.38583
Natural Gas Supply Charge ($/Mcf) - Rider A	$4.34390	$4.47320	$4.47320	$4.47320	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.21260	$5.21260	$4.85977
Gas Adjustment Charge ($/Mcf) - Rider A	($0.73630)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	$0.22230	$0.22230	($0.50306)
TCJA Surcredit ($/Mcf)	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$3,351	$3,721	$3,489	$3,226	$3,482	$4,076	$2,749	$3,040	$3,196	$3,369	$3,912	$4,312	$41,923
Natural Gas Supply Charge ($/Mcf) - Rider A	39,903	45,278	42,460	39,252	46,381	54,290	36,618	40,490	42,569	44,875	45,631	50,296	528,043
Gas Adjustment Charge ($/Mcf) - Rider A	(6,764)	(6,491)	(6,087)	(5,627)	(5,908)	(6,915)	(4,664)	(5,157)	(5,422)	(5,716)	1,946	2,145	(54,660)
TCJA Surcredit	665	732	687	635	667	780	526	582	612	645	633	698	7,862
Total Gas Cost Revenues	$37,155	$43,240	$40,549	$37,486	$44,622	$52,231	$35,229	$38,955	$40,955	$43,173	$52,122	$57,451	$523,168
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($17)	($19)	($17)	($16)	($19)	($23)	($15)	($17)	($18)	($19)	($16)	($17)	($213)
Total Revenues	$55,848	$63,837	$59,865	$55,416	$66,220	$77,511	$52,383	$57,922	$60,896	$64,377	$69,630	$76,750	$760,656
Unit Margin ($/Mcf)	$2.0368	$2.0368	$2.0368	$2.0452	$2.3466	$2.3466	$2.3606	$2.3606	$2.3606	$2.3812	$2.0018	$2.0018	$2.1876

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SVIS Sales	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	116	118	125	126	127	128	134	130	129	127	125	126	1,509
Total Volume	665	2,307	8,667	13,582	14,455	11,851	5,511	3,357	1,302	160	357	184	62,396
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01226	$0.01302	$0.01302	$0.01302	$0.01493	$0.01493	$0.01493	$0.01493	$0.01493	$0.01493	$0.01847	$0.01847	$0.01418
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.63%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$9,512	$9,676	$10,209	$10,332	$10,414	$10,496	$10,988	$10,660	$10,537	$10,373	$10,250	$10,291	$123,738
Volumetric Distribution Charge	1,379	4,780	17,959	28,145	29,953	24,557	11,419	6,957	2,697	332	740	380	129,298
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	8	30	113	177	216	177	82	50	19	2	7	3	885
Rider H - Gas Procurement Charge	76	265	996	1,561	1,661	1,362	633	386	150	18	41	21	7,169
DSIC - Distribution System Improvement Charge	0	0	0	165	173	150	234	182	135	203	209	202	1,653
Total Base Non Gas Cost Rate Revenue	$10,975	$14,751	$29,276	$40,379	$42,416	$36,741	$23,356	$18,235	$13,539	$10,929	$11,246	$10,898	$262,743
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37438
Natural Gas Supply Charge ($/Mcf) - Rider A	$4.34390	$4.47320	$4.47320	$4.47320	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.21260	$5.21260	$4.80795
Gas Adjustment Charge ($/Mcf) - Rider A	($0.73630)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	$0.22230	$0.22230	($0.63485)
TCJA Surcredit ($/Mcf)	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10456
OPEB Surcredit ($/Mcf) - Rider I	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$243	$848	$3,186	$4,993	$5,464	$4,479	$2,083	$1,269	$492	$61	$160	$82	$23,360
Natural Gas Supply Charge ($/Mcf) - Rider A	2,890	10,319	38,767	60,755	72,776	59,665	27,745	16,903	6,553	807	1,861	957	299,998
Gas Adjustment Charge ($/Mcf) - Rider A	(490)	(1,479)	(5,558)	(8,710)	(9,270)	(7,600)	(3,534)	(2,153)	(835)	(103)	79	41	(39,612)
TCJA Surcredit	70	241	906	1,420	1,512	1,239	576	351	136	17	37	19	6,524
OPEB Surcredit - Rider I	(40)	(138)	(517)	(811)	(863)	(707)	(329)	(200)	(78)	(10)	(21)	(11)	(3,725)
Total Gas Cost Revenues	$2,673	$9,791	$36,784	$57,647	$69,619	$57,076	$26,541	$16,170	$6,268	$772	$2,116	$1,088	$286,545
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($10)	($13)	($26)	($36)	($38)	($33)	($21)	($16)	($12)	($10)	($10)	($10)	($235)
Total Revenues	$13,638	$24,529	$66,034	$97,990	$111,997	$93,784	$49,876	$34,389	$19,795	$11,691	$13,352	$11,976	$549,053
Unit Margin ($/Mcf)	$16.4945	$6.3947	$3.3781	$2.9730	$2.9345	$3.1004	$4.2383	$5.4315	$10.4015	$68.1766	$31.4932	$59.3889	$4.2109

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SVIS SATC	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	10	10	11	10	10	11	12	13	11	11	11	11	130
Total Volume	48	128	466	697	808	872	550	274	50	153	15	20	4,081
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.72%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$820	$820	$861	$820	$820	$902	$984	$1,025	$902	$902	$902	$902	$10,660
Volumetric Distribution Charge	99	265	966	1,444	1,674	1,807	1,140	568	104	317	31	41	8,457
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	9	10	11	21	16	10	23	18	18	137
Total Base Non Gas Cost Rate Revenue	$919	$1,085	$1,827	$2,274	$2,505	$2,720	$2,145	$1,609	$1,016	$1,242	$951	$961	$19,253
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37540
TCJA Surcredit ($/Mcf)	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10463
OPEB Surcredit ($/Mcf) - Rider I	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05979)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$18	$47	$171	$256	$305	$330	$208	$104	$19	$58	$7	$9	$1,532
TCJA Surcredit	5	13	49	73	84	91	58	29	5	16	2	2	427
OPEB Surcredit - Rider I	(3)	(8)	(28)	(42)	(48)	(52)	(33)	(16)	(3)	(9)	(1)	(1)	(244)
Total Gas Cost Revenues	$20	$52	$192	$287	$341	$369	$233	$117	$21	$65	$8	$10	$1,715
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($1)	($1)	($2)	($2)	($2)	($2)	($2)	($1)	($1)	($1)	($1)	($1)	($17)
Total Revenues	$938	$1,136	$2,017	$2,559	$2,844	$3,087	$2,376	$1,725	$1,036	$1,306	$958	$970	$20,951
Unit Margin ($/Mcf)	$19.1555	$8.4785	$3.9198	$3.2620	$3.0997	$3.1193	$3.9003	$5.8718	$20.3153	$8.1182	$63.3812	$48.0638	$4.7178

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SVIS MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	64	65	64	64	64	63	63	63	63	63	63	63	762
Total Volume	649	2,930	5,044	8,606	9,518	6,749	3,878	1,703	666	4,821	264	301	45,129
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.68%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	5,248	5,330	5,248	5,248	5,248	5,166	5,166	5,166	5,166	5,166	5,166	5,166	62,484
Volumetric Distribution Charge	1,345	6,072	10,451	17,834	19,724	13,985	8,036	3,528	1,379	9,991	547	623	93,516
DSIC - Distribution System Improvement Charge	0	0	0	95	102	79	133	88	66	286	108	109	1,067
Total Base Non Gas Cost Rate Revenue	$6,593	$11,402	$15,699	$23,176	$25,074	$19,229	$13,336	$8,782	$6,611	$15,443	$5,821	$5,899	$157,067
Gas Cost Rates:													
MMT Gas Cost Charge	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.49000	$0.49000	$0.47023
TCJA Surcredit ($/Mcf)	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296
OPEB Surcredit ($/Mcf) - Rider I	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)
Gas Cost Revenues													
MMT Gas Cost Charge	$305	$1,377	$2,370	$4,045	$4,474	$3,172	$1,823	$800	$313	$2,266	$129	$147	$21,221
TCJA Surcredit	60	272	469	800	885	627	361	158	62	448	25	28	4,195
OPEB Surcredit - Rider I	(15)	(69)	(119)	(203)	(224)	(159)	(91)	(40)	(16)	(113)	(6)	(7)	(1,062)
Total Gas Cost Revenues	$350	$1,580	$2,720	$4,642	$5,135	$3,640	$2,093	$918	$359	$2,601	$148	$168	$24,354
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($6)	($10)	($14)	($21)	($23)	($17)	($12)	($8)	($6)	($14)	($5)	($5)	($141)
Total Revenues	$6,937	$12,972	$18,405	$27,797	$30,186	$22,852	$15,417	$9,692	$6,964	$18,030	$5,964	$6,062	$181,280
Unit Margin ($/Mcf)	$10.1572	$3.8911	$3.1127	$2.6930	$2.6343	$2.8493	$3.4387	$5.1580	$9.9329	$3.2031	$22.0343	$19.6160	$3.4804

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IVIS Sales	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	59	60	59	57	57	57	53	53	54	54	51	52	665
Total Volume	9,501	12,234	20,860	36,140	38,828	32,288	21,695	13,198	7,599	4,931	6,495	6,738	210,506
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01226	$0.01302	$0.01302	$0.01302	$0.01493	$0.01493	$0.01493	$0.01493	$0.01493	$0.01493	$0.01847	$0.01847	$0.01440
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.65%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$14,868	$15,120	$14,868	$14,364	$14,364	$14,364	$13,356	$13,356	$13,482	$13,482	$12,852	$12,978	$167,454
Volumetric Distribution Charge	12,680	16,328	27,842	48,236	51,824	43,094	28,957	17,615	10,142	6,581	8,668	8,994	280,962
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	116	159	272	471	580	482	324	197	113	74	120	124	3,032
Rider H - Gas Procurement Charge	1,092	1,406	2,397	4,153	4,461	3,710	2,493	1,516	873	567	746	774	24,187
DSIC - Distribution System Improvement Charge	0	0	0	276	292	253	456	330	249	391	423	432	3,102
Total Base Non Gas Cost Rate Revenue	$28,757	$33,013	$45,378	$67,499	$71,521	$61,903	$45,585	$33,015	$24,859	$21,095	$22,809	$23,303	$478,737
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37831
Natural Gas Supply Charge ($/Mcf) - Rider A	$4.34390	$4.47320	$4.47320	$4.47320	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.21260	$5.21260	$4.83010
Gas Adjustment Charge ($/Mcf) - Rider A	($0.73630)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	$0.22230	$0.22230	($0.59129)
TCJA Surcredit ($/Mcf)	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461
OPEB Surcredit ($/Mcf) - Rider I	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$3,466	$4,497	$7,668	$13,285	$14,677	$12,205	$8,201	$4,989	$2,872	$1,864	$2,902	$3,011	$79,637
Natural Gas Supply Charge ($/Mcf) - Rider A	41,270	54,724	93,311	161,662	195,492	162,562	109,232	66,448	38,258	24,827	33,853	35,124	1,016,763
Gas Adjustment Charge ($/Mcf) - Rider A	(6,995)	(7,845)	(13,377)	(23,177)	(24,900)	(20,706)	(13,913)	(8,464)	(4,873)	(3,162)	1,444	1,498	(124,470)
TCJA Surcredit	519	668	1,139	1,974	2,120	1,763	1,185	721	415	269	355	368	11,496
OPEB Surcredit - Rider I	(1,274)	(1,641)	(2,798)	(4,847)	(5,208)	(4,331)	(2,910)	(1,770)	(1,019)	(661)	(871)	(904)	(28,234)
Total Gas Cost Revenues	$36,986	$50,403	$85,943	$148,897	$182,181	$151,493	$101,795	$61,924	$35,653	$23,137	$37,683	$39,097	$955,192
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($26)	($30)	($41)	($61)	($64)	($56)	($41)	($30)	($22)	($19)	($21)	($21)	($432)
Total Revenues	$65,717	$83,386	$131,280	$216,335	$253,638	$213,340	$147,339	$94,909	$60,490	$44,213	$60,471	$62,379	$1,433,497
Unit Margin ($/Mcf)	$3.0268	$2.6986	$2.1754	$1.8677	$1.8420	$1.9172	$2.1012	$2.5015	$3.2715	$4.2780	$3.5121	$3.4582	$2.2742

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IVIS SATC	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	3	3	3	4	4	3	3	3	3	3	3	3	38
Total Volume	18	226	740	1,699	1,456	988	965	447	99	14	4	9	6,665
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.65%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$756	$756	$756	$1,008	$1,008	$756	$756	$756	$756	$756	$756	$756	$9,576
Volumetric Distribution Charge	24	302	988	2,268	1,943	1,319	1,288	597	132	19	5	12	8,896
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	13	12	9	21	14	9	15	14	15	121
Total Base Non Gas Cost Rate Revenue	$780	$1,058	$1,744	$3,289	$2,963	$2,083	$2,065	$1,366	$897	$789	$776	$783	$18,593
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37388
TCJA Surcredit ($/Mcf)	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05431
OPEB Surcredit ($/Mcf) - Rider I	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13398)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$7	$83	$272	$625	$550	$373	$365	$169	$37	$5	$2	$4	$2,492
TCJA Surcredit	1	12	40	93	79	54	53	24	5	1	0	0	362
OPEB Surcredit - Rider I	(2)	(30)	(99)	(228)	(195)	(133)	(129)	(60)	(13)	(2)	(1)	(1)	(893)
Total Gas Cost Revenues	$6	$65	$213	$490	$434	$294	$289	$133	$29	$4	$1	$3	$1,961
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.10%
Rider B - State Tax Adjustment	($1)	($1)	($2)	($3)	($3)	($2)	($2)	($1)	($1)	($1)	($1)	($1)	($19)
Total Revenues	$785	$1,122	$1,955	$3,776	$3,394	$2,375	$2,352	$1,498	$925	$792	$776	$785	$20,535
Unit Margin ($/Mcf)	$43.3347	$4.6739	$2.3560	$1.9359	$2.0355	$2.1085	$2.1395	$3.0565	$9.0617	$56.3805	$193.9320	$86.9475	$2.7895

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IVIS MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	262	264	264	264	264	264	263	264	261	261	262	259	3,151
Total Volume	115,719	156,127	186,292	261,371	328,793	289,140	228,299	166,918	125,632	116,316	111,196	123,660	2,209,460
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.73%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	66,024	66,402	66,402	66,528	66,528	66,528	66,276	66,402	65,772	65,772	66,024	65,268	793,926
Volumetric Distribution Charge	154,450	208,382	248,644	348,851	438,839	385,915	304,710	222,785	167,681	155,247	148,413	165,049	2,948,967
DSIC - Distribution System Improvement Charge	0	0	0	1,703	2,072	1,855	3,747	2,921	2,358	4,177	4,053	4,353	27,239
Total Base Non Gas Cost Rate Revenue	$220,474	$274,784	$315,046	$417,082	$507,439	$454,298	$374,733	$292,108	$235,811	$225,197	$218,490	$234,670	$3,770,132
Gas Cost Rates:													
MMT Gas Cost Charge	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.49000	$0.49000	$0.47213
TCJA Surcredit ($/Mcf)	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960
OPEB Surcredit ($/Mcf) - Rider I	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)
Gas Cost Revenues													
MMT Gas Cost Charge	$54,388	$73,379	$87,557	$122,844	$154,533	$135,896	$107,300	$78,451	$59,047	$54,669	$54,486	$60,594	$1,043,144
TCJA Surcredit	4,582	6,183	7,377	10,350	13,020	11,450	9,041	6,610	4,975	4,606	4,403	4,897	87,494
OPEB Surcredit - Rider I	(7,630)	(10,295)	(12,284)	(17,235)	(21,681)	(19,066)	(15,054)	(11,007)	(8,284)	(7,670)	(7,332)	(8,154)	(145,692)
Total Gas Cost Revenues	$51,340	$69,267	$82,650	$115,959	$145,872	$128,280	$101,287	$74,054	$55,738	$51,605	$51,557	$57,337	$984,946
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($198)	($247)	($284)	($375)	($457)	($409)	($337)	($263)	($212)	($203)	($197)	($211)	($3,393)
Total Revenues	$271,616	$343,804	$397,412	$532,666	$652,854	$582,169	$475,683	$365,899	$291,337	$276,599	$269,850	$291,796	$4,751,685
Unit Margin ($/Mcf)	$1.9053	$1.7600	$1.6911	$1.5958	$1.5433	$1.5712	$1.6414	$1.7500	$1.8770	$1.9361	$1.9649	$1.8977	$1.7064

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IVIS DMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	24	24	24	24	24	24	25	25	26	26	26	26	298
Total Volume	37,967	49,449	53,613	76,570	97,129	82,799	75,166	60,733	50,263	45,497	43,636	41,260	714,082
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.76%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	6,048	6,048	6,048	6,048	6,048	6,048	6,300	6,300	6,552	6,552	6,552	6,552	75,096
Volumetric Distribution Charge	50,675	66,000	71,558	102,198	129,638	110,511	100,324	81,061	67,087	60,725	58,240	55,069	953,086
DSIC - Distribution System Improvement Charge	0	0	0	444	556	478	1,077	882	744	1,272	1,225	1,165	7,842
Total Base Non Gas Cost Rate Revenue	$56,723	$72,048	$77,606	$108,690	$136,243	$117,037	$107,700	$88,243	$74,382	$68,549	$66,017	$62,786	$1,036,024
Gas Cost Rates:													
TCJA Surcredit ($/Mcf)	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960
OPEB Surcredit ($/Mcf) - Rider I	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)
Gas Cost Revenues													
TCJA Surcredit	1,504	1,958	2,123	3,032	3,846	3,279	2,977	2,405	1,990	1,802	1,728	1,634	28,278
OPEB Surcredit - Rider I	(2,504)	(3,261)	(3,535)	(5,049)	(6,405)	(5,460)	(4,956)	(4,005)	(3,314)	(3,000)	(2,877)	(2,721)	(47,087)
Total Gas Cost Revenues	($1,000)	($1,303)	($1,412)	($2,017)	($2,559)	($2,181)	($1,979)	($1,600)	($1,324)	($1,198)	($1,149)	($1,087)	($18,809)
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($51)	($65)	($70)	($98)	($123)	($105)	($97)	($79)	($67)	($62)	($59)	($57)	($933)
Total Revenues	$55,672	$70,680	$76,124	$106,575	$133,561	$114,751	$105,624	$86,564	$72,991	$67,289	$64,809	$61,642	$1,016,282
Unit Margin ($/Mcf)	$1.4940	$1.4570	$1.4475	$1.4195	$1.4027	$1.4135	$1.4328	$1.4530	$1.4799	$1.5067	$1.5129	$1.5217	$1.4508

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LVIS MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	8	8	8	8	8	8	8	8	8	8	8	8	96
Total Volume	30,073	37,091	41,537	40,962	49,392	40,352	42,930	47,531	42,410	40,298	35,752	44,035	492,363
Base Non Gas Cost Rate:													
Basic Service Charge	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00
Volumetric Distribution Charge	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.84%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	8,184	8,184	8,184	8,184	8,184	8,184	8,184	8,184	8,184	8,184	8,184	8,184	98,208
Volumetric Distribution Charge	30,804	37,992	42,546	41,957	50,592	41,333	43,973	48,686	43,441	41,277	36,621	45,105	504,327
DSIC - Distribution System Improvement Charge	0	0	0	206	241	203	527	574	521	935	847	1,007	5,061
Total Base Non Gas Cost Rate Revenue	$38,988	$46,176	$50,730	$50,347	$59,017	$49,720	$52,684	$57,444	$52,146	$50,396	$45,652	$54,296	$607,596
Gas Cost Rates:													
MMT Gas Cost Charge	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.49000	$0.49000	$0.47324
TCJA Surcredit ($/Mcf)	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.00000
OPEB Surcredit ($/Mcf) - Rider I	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)
Gas Cost Revenues													
MMT Gas Cost Charge	$14,134	$17,433	$19,522	$19,252	$23,214	$18,965	$20,177	$22,340	$19,933	$18,940	$17,518	$21,577	$233,005
TCJA Surcredit	851	1,049	1,175	1,159	1,397	1,142	1,214	1,345	1,200	1,140	1,011	1,246	13,929
OPEB Surcredit - Rider I	(1,865)	(2,300)	(2,575)	(2,540)	(3,062)	(2,502)	(2,662)	(2,947)	(2,629)	(2,498)	(2,217)	(2,730)	(30,527)
Total Gas Cost Revenues	$13,120	$16,182	$18,122	$17,871	$21,549	$17,605	$18,729	$20,738	$18,504	$17,582	$16,312	$20,093	$216,407
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($35)	($42)	($46)	($45)	($53)	($45)	($47)	($52)	($47)	($45)	($41)	($49)	($547)
Total Revenues	$52,073	$62,316	$68,806	$68,173	$80,513	$67,280	$71,366	$78,130	$70,603	$67,933	$61,923	$74,340	$823,456
Unit Margin ($/Mcf)	$1.2964	$1.2449	$1.2213	$1.2291	$1.1949	$1.2321	$1.2272	$1.2086	$1.2296	$1.2506	$1.2769	$1.2330	$1.2340

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LVIS DMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	21	21	21	21	21	21	19	19	19	19	19	19	240
Total Volume	118,195	140,776	153,578	185,802	239,968	213,066	175,193	134,375	127,065	110,366	137,384	92,473	1,828,242
Base Non Gas Cost Rate:													
Basic Service Charge	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00
Volumetric Distribution Charge	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.74%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	21,483	20,972	21,483	21,483	21,483	21,483	19,437	19,437	19,437	19,437	19,437	19,437	245,009
Volumetric Distribution Charge	121,068	144,197	157,310	190,317	245,799	218,244	179,450	137,641	130,153	113,048	140,723	94,720	1,872,668
DSIC - Distribution System Improvement Charge	0	0	0	868	1,096	983	2,009	1,586	1,511	2,504	3,027	2,158	15,742
Total Base Non Gas Cost Rate Revenue	$142,551	$165,168	$178,793	$212,668	$268,378	$240,710	$200,896	$158,664	$151,101	$134,989	$163,187	$116,315	$2,133,419
Gas Cost Rates:													
TCJA Surcredit ($/Mcf)	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829
OPEB Surcredit ($/Mcf) - Rider I	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)
Gas Cost Revenues													
TCJA Surcredit	3,344	3,983	4,345	5,256	6,789	6,028	4,956	3,801	3,595	3,122	3,887	2,616	51,722
OPEB Surcredit - Rider I	(7,328)	(8,728)	(9,522)	(11,520)	(14,878)	(13,210)	(10,862)	(8,331)	(7,878)	(6,843)	(8,518)	(5,733)	(113,351)
Total Gas Cost Revenues	($3,984)	($4,745)	($5,177)	($6,264)	($8,089)	($7,182)	($5,906)	($4,530)	($4,283)	($3,721)	($4,631)	($3,117)	($61,629)
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($128)	($149)	($161)	($191)	($242)	($217)	($181)	($143)	($136)	($121)	($147)	($105)	($1,921)
Total Revenues	$138,439	$160,274	$173,455	$206,213	$260,047	$233,311	$194,809	$153,991	$146,682	$131,147	$158,409	$113,093	$2,069,869
Unit Margin ($/Mcf)	$1.2061	$1.1733	$1.1642	$1.1446	$1.1184	$1.1297	$1.1467	$1.1808	$1.1892	$1.2231	$1.1878	$1.2578	$1.1669

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LIS MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	1	1	1	1	1	1	1	1	1	1	1	1	12
Total Volume	30,946	30,426	32,253	29,558	35,804	32,014	33,409	30,961	29,869	26,644	26,501	27,507	365,892
Base Non Gas Cost Rate:													
Basic Service Charge	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00
Volumetric Distribution Charge	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.79%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	13,980
Volumetric Distribution Charge	18,546	18,234	19,329	17,714	21,457	19,186	20,022	18,555	17,900	15,968	15,882	16,485	219,279
DSIC - Distribution System Improvement Charge	0	0	0	77	93	83	214	199	193	324	322	334	1,839
Total Base Non Gas Cost Rate Revenue	$19,711	$19,399	$20,494	$18,957	$22,715	$20,434	$21,401	$19,919	$19,258	$17,457	$17,369	$17,984	$235,098
Gas Cost Rates:													
MMT Gas Cost Charge	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.49000	$0.49000	$0.47295
TCJA Surcredit ($/Mcf)	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155
OPEB Surcredit ($/Mcf) - Rider I	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)
Gas Cost Revenues													
MMT Gas Cost Charge	$14,545	$14,300	$15,159	$13,892	$16,828	$15,047	$15,702	$14,552	$14,038	$12,523	$12,985	$13,478	$173,049
TCJA Surcredit	357	351	373	341	414	370	386	358	345	308	306	318	4,227
OPEB Surcredit - Rider I	(432)	(425)	(450)	(413)	(500)	(447)	(466)	(432)	(417)	(372)	(370)	(384)	(5,108)
Total Gas Cost Revenues	$14,470	$14,226	$15,082	$13,820	$16,742	$14,970	$15,622	$14,478	$13,966	$12,459	$12,921	$13,412	$172,168
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($18)	($17)	($18)	($17)	($20)	($18)	($19)	($18)	($17)	($16)	($16)	($16)	($210)
Total Revenues	$34,163	$33,608	$35,558	$32,760	$39,437	$35,386	$37,004	$34,379	$33,207	$29,900	$30,274	$31,380	$407,056
Unit Margin ($/Mcf)	$0.6369	$0.6376	$0.6354	$0.6413	$0.6344	$0.6383	$0.6406	$0.6434	$0.6448	$0.6552	$0.6554	$0.6538	$0.6425

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LIS DMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	9	9	9	9	9	9	10	10	10	10	10	10	114
Total Volume	224,392	255,936	285,279	367,115	425,555	390,398	382,886	286,135	215,840	177,881	208,138	198,815	3,418,371
Base Non Gas Cost Rate:													
Basic Service Charge	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00
Volumetric Distribution Charge	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.73%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	10,485	10,485	10,485	10,485	10,485	10,485	11,650	11,650	11,650	11,650	11,650	11,650	132,810
Volumetric Distribution Charge	134,478	153,383	170,968	220,012	255,035	233,966	229,464	171,481	129,353	106,604	124,737	119,150	2,048,629
DSIC - Distribution System Improvement Charge	0	0	0	945	1,089	1,002	2,435	1,850	1,424	2,235	2,578	2,472	16,030
Total Base Non Gas Cost Rate Revenue	$144,963	$163,868	$181,453	$231,442	$266,609	$245,453	$243,549	$184,980	$142,427	$120,489	$138,965	$133,272	$2,197,469
Gas Cost Rates:													
TCJA Surcredit ($/Mcf)	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155
OPEB Surcredit ($/Mcf) - Rider I	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.00241)
Gas Cost Revenues													
TCJA Surcredit	2,592	2,956	3,295	4,240	4,915	4,509	4,422	3,305	2,493	2,055	2,404	2,296	39,482
OPEB Surcredit - Rider I	(3,133)	(3,573)	(3,982)	(5,125)	(5,941)	(5,450)	(5,345)	(3,994)	(3,013)	(2,483)	(2,906)	(2,775)	(47,720)
Total Gas Cost Revenues	($541)	($617)	($687)	($885)	($1,026)	($941)	($923)	($689)	($520)	($428)	($502)	($479)	($8,238)
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($130)	($147)	($163)	($208)	($240)	($221)	($219)	($166)	($128)	($108)	($125)	($120)	($1,975)
Total Revenues	$144,292	$163,104	$180,603	$230,349	$265,343	$244,291	$242,407	$184,125	$141,779	$119,953	$138,338	$132,673	$2,187,256
Unit Margin ($/Mcf)	$0.6460	$0.6403	$0.6361	$0.6304	$0.6265	$0.6287	$0.6361	$0.6465	$0.6599	$0.6774	$0.6677	$0.6703	$0.6428

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LIS DMT Negotiated	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	10	10	10	10	10	10	10	10	10	10	10	10	120
Total Volume	587,209	606,268	655,915	711,269	827,660	737,595	770,674	612,741	579,840	527,486	581,920	551,544	7,750,120
Base Non Gas Cost Rate:													
Basic Service Charge	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00
Volumetric Distribution Charge	$0.31410	$0.31360	$0.30200	$0.30180	$0.28770	$0.29000	$0.28820	$0.29660	$0.29190	$0.32410	$0.30250	$0.31680	$0.30118
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	0.79%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	139,800
Volumetric Distribution Charge	184,442	190,126	198,086	214,661	238,118	213,902	222,108	181,739	169,255	170,958	176,031	174,729	2,334,156
DSIC - Distribution System Improvement Charge	0	0	0	928	1,024	925	2,361	1,953	1,827	3,451	3,547	3,523	19,539
Total Base Non Gas Cost Rate Revenue	$196,092	$201,776	$209,736	$227,239	$250,792	$226,477	$236,119	$195,342	$182,732	$186,059	$191,228	$189,902	$2,493,495
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)
Gas Cost Revenues													
OPEB Surcredit - Rider I	(8,197)	(8,463)	(9,157)	(9,929)	(11,554)	(10,297)	(10,759)	(8,554)	(8,095)	(7,364)	(8,124)	(7,700)	(108,193)
Total Gas Cost Revenues	($8,197)	($8,463)	($9,157)	($9,929)	($11,554)	($10,297)	($10,759)	($8,554)	($8,095)	($7,364)	($8,124)	($7,700)	($108,193)
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($176)	($182)	($189)	($205)	($226)	($204)	($213)	($176)	($164)	($167)	($172)	($171)	($2,245)
Total Revenues	$187,719	$193,131	$200,390	$217,105	$239,012	$215,976	$225,147	$186,612	$174,473	$178,528	$182,932	$182,031	$2,383,057
Unit Margin ($/Mcf)	$0.3339	$0.3328	$0.3198	$0.3195	$0.3030	$0.3070	$0.3064	$0.3188	$0.3151	$0.3527	$0.3286	$0.3443	$0.3217

NATIONAL FUEL EXHIBIT CTM-7

NORMALIZED HISTORIC TEST YEAR

PROPOSED RATES

National Fuel Exhibit CTM-7
Schedule 1

National Fuel Gas Distribution Corporation
Pennsylvania Division
Normalized Historic Test Year Ended September 30, 2025
Summary of Revenues (Proposed Rates)

	Account	Total Revenue	Total Gas Cost	Total Delivery
Gas Sales				
Residential	480	159,502,965	76,789,695	82,713,270
Commercial/Public Authority	481	27,398,161	15,387,314	12,010,847
Industrial	481	1,978,648	1,241,737	736,911
Subtotal		188,879,775	93,418,746	95,461,029
Transportation				
Residential	489	9,023,214	517,530	8,505,684
Commercial/Public Authority	489	16,962,426	2,243,155	14,719,271
Industrial	489	13,766,896	1,204,682	12,562,214
Subtotal		39,752,537	3,965,367	35,787,170
Total Billed Revenue		228,632,312	97,384,113	131,248,199
Other Operating Revenues				
Forfeited Discounts	487	1,126,842	0	1,126,842
Rent From Gas Property	493	100,267	0	100,267
Other Gas Revenues	495	47,653	0	47,653
Subtotal		1,274,761	0	1,274,761
Total Operating Revenue		229,907,073	97,384,113	132,522,960

National Fuel Gas Distribution Corporation
Pennsylvania Division
Normalized Historic Test Year Ended September 30, 2025
Summary of Revenues by Service Class (Proposed Rates)

	Account	Reference (CTM-7, Sch. 4)	Average Customers	Total Usage (Mcf)	Total Revenue	Total Gas Cost	Total Delivery
Residential Sales	480	Page 1	172,195	16,169,581	153,913,398	74,090,278	79,823,120
Residential CAP	480	Page 2	5,828	607,145	5,589,568	2,699,417	2,890,151
Residential SATC	489	Page 3	18,045	1,712,357	8,558,471	463,746	8,094,725
Residential MMT	489	Page 4	498	110,652	464,744	53,784	410,960
Total Residential			196,566	18,599,735	168,526,180	77,307,225	91,218,955
SCPA < 250 Sales	481	Page 5	8,578	957,108	9,477,524	4,375,516	5,102,008
SCPA < 250 SATC	489	Page 6	730	90,131	478,980	35,593	443,387
SCPA < 250 MMT	489	Page 7	1,152	161,947	825,208	80,412	744,796
SCPA > 250 Sales	481	Page 8	2,720	1,330,563	10,141,510	6,026,810	4,114,700
SCPA > 250 SATC	489	Page 9	313	156,376	512,072	52,156	459,916
SCPA > 250 MMT	489	Page 10	1,248	729,636	2,362,788	310,869	2,051,919
LCPA	481	Page 11	452	970,223	7,020,373	4,461,820	2,558,553
LCPA SATC	489	Page 12	46	87,049	259,360	30,992	228,368
LCPA MMT	489	Page 13	988	4,502,690	11,064,532	1,797,950	9,266,582
LCPA DMT	489	Page 14	13	903,240	1,459,486	(64,817)	1,524,303
Natural Gas Vechicles	481	Page 15	7	108,656	758,754	523,168	235,586
Total Commercial & Public Authority			16,247	9,997,619	44,360,588	17,630,469	26,730,119
SVIS Sales	481	Page 16	126	62,396	547,592	286,545	261,047
SVIS SATC	489	Page 17	11	4,081	20,815	1,715	19,100
SVIS MMT	489	Page 18	64	45,129	180,214	24,354	155,860
IVIS Sales	481	Page 19	55	210,506	1,431,056	955,192	475,864
IVIS SATC	489	Page 20	3	6,665	20,414	1,961	18,453
IVIS MMT	489	Page 21	263	2,209,460	4,724,471	984,946	3,739,525
IVIS DMT	489	Page 22	25	714,082	1,008,448	(18,809)	1,027,257
LVIS MMT	489	Page 23	8	492,363	818,399	216,407	601,992
LVIS DMT	489	Page 24	20	1,828,242	2,054,141	(61,629)	2,115,770
LIS MMT	489	Page 25	1	365,892	405,219	172,168	233,051
LIS DMT	489	Page 26	10	3,418,371	2,171,239	(8,238)	2,179,477
LIS DMT Negotiated	489	Page 27	10	7,750,120	2,363,536	(108,193)	2,471,729
Total Industrial			594	17,107,308	15,745,545	2,446,419	13,299,126
Grand Total			**213,407**	**45,704,661**	**228,632,312**	**97,384,113**	**131,248,199**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Normalized Historic Test Year Ended September 30, 2025
Billed Delivery Revenues by Rate Type (Proposed Rates)

	Account	Reference (CTM-7, Sch. 4)	Basic Service Charge	Distribution Charge	Rider B	DSIC	Rider E	Rider G	Rider H	Total Delivery
Residential Sales	480	Page 1	28,928,774	47,880,353	(71,906)	0	0	1,228,014	1,857,885	79,823,120
Residential CAP	480	Page 2	979,069	1,797,840	(2,601)	0	0	46,082	69,761	2,890,151
Residential SATC	489	Page 3	3,031,490	5,070,525	(7,290)	0	0	0	0	8,094,725
Residential MMT	489	Page 4	83,678	327,652	(370)	0	0	0	0	410,960
Total Residential			33,023,011	55,076,369	(82,167)	0	0	1,274,095	1,927,646	91,218,955
SCPA < 250 Sales	481	Page 5	2,779,286	2,200,811	(4,596)	0	0	16,536	109,972	5,102,008
SCPA < 250 SATC	489	Page 6	236,534	207,251	(397)	0	0	0	0	443,387
SCPA < 250 MMT	489	Page 7	373,086	372,381	(671)	0	0	0	0	744,796
SCPA > 250 Sales	481	Page 8	1,207,458	2,734,972	(3,707)	0	0	23,095	152,882	4,114,700
SCPA > 250 SATC	489	Page 9	138,898	321,431	(413)	0	0	0	0	459,916
SCPA > 250 MMT	489	Page 10	554,001	1,499,767	(1,849)	0	0	0	0	2,051,919
LCPA	481	Page 11	819,628	1,612,727	(2,304)	0	0	17,024	111,479	2,558,553
LCPA SATC	489	Page 12	83,881	144,695	(207)	0	0	0	0	228,368
LCPA MMT	489	Page 13	1,790,558	7,484,371	(8,347)	0	0	0	0	9,266,582
LCPA DMT	489	Page 14	24,311	1,501,365	(1,373)	0	0	0	0	1,524,303
Natural Gas Vechicles	481	Page 15	0	235,798	(212)	0	0	0	0	235,586
Total Commercial & Public Authority			8,007,640	18,315,568	(24,076)	0	0	56,655	374,332	26,730,119
SVIS Sales	481	Page 16	123,738	129,298	(235)	0	0	1,077	7,169	261,047
SVIS SATC	489	Page 17	10,660	8,457	(17)	0	0	0	0	19,100
SVIS MMT	489	Page 18	62,484	93,516	(140)	0	0	0	0	155,860
IVIS Sales	481	Page 19	167,454	280,962	(430)	0	0	3,691	24,187	475,864
IVIS SATC	489	Page 20	9,576	8,896	(19)	0	0	0	0	18,453
IVIS MMT	489	Page 21	793,926	2,948,967	(3,368)	0	0	0	0	3,739,525
IVIS DMT	489	Page 22	75,096	953,086	(925)	0	0	0	0	1,027,257
LVIS MMT	489	Page 23	98,208	504,327	(543)	0	0	0	0	601,992
LVIS DMT	489	Page 24	245,009	1,872,668	(1,907)	0	0	0	0	2,115,770
LIS MMT	489	Page 25	13,980	219,279	(208)	0	0	0	0	233,051
LIS DMT	489	Page 26	132,810	2,048,629	(1,962)	0	0	0	0	2,179,477
LIS DMT Negotiated	489	Page 27	139,800	2,334,156	(2,227)	0	0	0	0	2,471,729
Total Industrial			1,872,741	11,402,241	(11,981)	0	0	4,768	31,356	13,299,126
Grand Total			**42,903,391**	**84,794,179**	**(118,224)**	**0**	**0**	**1,335,518**	**2,333,334**	**131,248,199**

National Fuel Gas Distribution Corporation
Pennsylvania Division
Normalized Historic Test Year Ended September 30, 2025
Detailed Billed Revenue Workpapers (Proposed Rates)

Residential Sales Service	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	172,198	172,172	172,832	173,303	173,146	173,231	172,969	172,212	171,733	171,229	170,732	170,588	2,066,341
Total Volume	543,831	1,163,392	2,240,364	2,882,081	2,898,653	2,525,295	1,823,589	1,023,732	401,382	210,689	210,129	246,444	16,169,581
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96110	$2.96110	$2.96114
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.06558	$0.06965	$0.06965	$0.06965	$0.07986	$0.07986	$0.07986	$0.07986	$0.07986	$0.07986	$0.09879	$0.09879	$0.07595
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$2,410,765	$2,410,408	$2,419,641	$2,426,235	$2,424,037	$2,425,227	$2,421,559	$2,410,961	$2,404,255	$2,397,206	$2,390,248	$2,388,232	$28,928,774
Volumetric Distribution Charge	1,610,338	3,444,967	6,634,031	8,534,245	8,583,317	7,477,752	5,399,902	3,031,414	1,188,548	623,880	622,213	729,745	47,880,353
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	35,662	81,033	156,046	200,743	231,487	201,671	145,632	81,755	32,054	16,826	20,759	24,346	1,228,014
Rider H - Gas Procurement Charge	62,486	133,674	257,418	331,151	333,055	290,156	209,530	117,627	46,119	24,208	24,144	28,316	1,857,885
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$4,119,251	$6,070,081	$9,467,136	$11,492,374	$11,571,897	$10,394,806	$8,176,624	$5,641,757	$3,670,977	$3,062,119	$3,057,363	$3,170,640	$79,895,026
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37546
Natural Gas Supply Charge ($/Mcf) - Rider A	$4.34390	$4.47320	$4.47320	$4.47320	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.21260	$5.21260	$4.79826
Gas Adjustment Charge ($/Mcf) - Rider A	($0.73630)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	$0.22230	$0.22230	($0.62011)
Rider F - CAP Discount Charge	$0.13960	$0.11790	$0.11790	$0.11790	$0.14600	$0.14600	$0.14600	$0.13390	$0.13390	$0.13390	$0.13140	$0.13140	$0.02368
OPEB Surcredit ($/Mcf) - Rider I	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)
TCJA Surcredit ($/Mcf)	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$198,390	$427,663	$823,558	$1,059,453	$1,095,691	$954,562	$689,317	$386,971	$151,722	$79,640	$93,907	$110,136	$6,071,010
Natural Gas Supply Charge ($/Mcf) - Rider A	2,362,347	5,204,085	10,021,596	12,892,125	14,594,138	12,714,355	9,181,406	5,154,286	2,020,878	1,060,777	1,095,318	1,284,614	77,585,925
Gas Adjustment Charge ($/Mcf) - Rider A	(400,423)	(746,083)	(1,436,745)	(1,848,279)	(1,858,906)	(1,619,472)	(1,169,468)	(656,519)	(257,406)	(135,115)	46,712	54,785	(10,026,919)
Rider F - CAP Discount Charge	75,919	137,164	264,139	339,797	423,203	368,693	266,244	137,078	53,745	28,211	27,611	32,383	2,154,187
OPEB Surcredit - Rider I	(120,595)	(257,982)	(496,801)	(639,101)	(642,776)	(559,984)	(404,381)	(227,013)	(89,006)	(46,720)	(46,596)	(54,649)	(3,585,604)
TCJA Surcredit	63,623	136,105	262,100	337,175	339,113	295,434	213,342	119,766	46,958	24,649	24,583	28,831	1,891,679
Total Gas Cost Revenues	$2,179,261	$4,900,952	$9,437,847	$12,141,170	$13,950,463	$12,153,588	$8,776,460	$4,914,569	$1,926,891	$1,011,442	$1,241,535	$1,456,100	$74,090,278
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($3,707)	($5,463)	($8,520)	($10,343)	($10,415)	($9,355)	($7,359)	($5,078)	($3,304)	($2,756)	($2,752)	($2,854)	($71,906)
Total Revenues	$6,294,805	$10,965,570	$18,896,463	$23,623,202	$25,511,945	$22,539,039	$16,945,725	$10,551,248	$5,594,564	$4,070,806	$4,296,146	$4,623,886	$153,913,398
Unit Margin ($/Mcf)	$7.5745	$5.2176	$4.2257	$3.9875	$3.9922	$4.1163	$4.4838	$5.5110	$9.1458	$14.5338	$14.5499	$12.8656	$4.9411

National Fuel Gas Distribution Corporation
Pennsylvania Division
Normalized Historic Test Year Ended September 30, 2025
Detailed Billed Revenue Workpapers (Proposed Rates)

Residential CAP	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	5,791	5,931	5,920	5,925	5,975	5,971	5,928	5,839	5,708	5,614	5,649	5,685	69,934
Total Volume	19,228	44,777	84,399	107,995	108,724	95,035	68,142	38,977	16,507	7,998	7,089	8,274	607,145
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96110	$2.96110	$2.96114
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.06558	$0.06965	$0.06965	$0.06965	$0.07986	$0.07986	$0.07986	$0.07986	$0.07986	$0.07986	$0.09879	$0.09879	$0.07590
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$81,074	$83,034	$82,873	$82,943	$83,650	$83,594	$82,985	$81,746	$79,905	$78,589	$79,086	$79,590	$979,069
Volumetric Distribution Charge	56,936	132,591	249,917	319,788	321,947	281,412	201,778	115,416	48,880	23,683	20,991	24,500	1,797,840
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	1,261	3,119	5,879	7,522	8,683	7,590	5,442	3,113	1,318	639	700	817	46,082
Rider H - Gas Procurement Charge	2,209	5,145	9,697	12,409	12,492	10,920	7,830	4,478	1,897	919	815	951	69,761
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$141,480	$223,889	$348,366	$422,662	$426,772	$383,515	$298,034	$204,754	$131,999	$103,830	$101,592	$105,858	$2,892,752
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37526
Natural Gas Supply Charge ($/Mcf) - Rider A	$4.34390	$4.47320	$4.47320	$4.47320	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.21260	$5.21260	$4.79804
Gas Adjustment Charge ($/Mcf) - Rider A	($0.73630)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	$0.22230	$0.22230	($0.62246)
OPEB Surcredit ($/Mcf) - Rider I	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)
TCJA Surcredit ($/Mcf)	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$7,014	$16,460	$31,025	$39,699	$41,098	$35,923	$25,758	$14,733	$6,240	$3,023	$3,168	$3,698	$227,839
Natural Gas Supply Charge ($/Mcf) - Rider A	83,525	200,296	377,534	483,083	547,404	478,482	343,081	196,241	83,109	40,268	36,952	43,129	2,913,104
Gas Adjustment Charge ($/Mcf) - Rider A	(14,158)	(28,715)	(54,125)	(69,257)	(69,725)	(60,946)	(43,699)	(24,996)	(10,586)	(5,129)	1,576	1,839	(377,921)
OPEB Surcredit - Rider I	(4,264)	(9,929)	(18,715)	(23,948)	(24,110)	(21,074)	(15,110)	(8,643)	(3,660)	(1,774)	(1,572)	(1,835)	(134,634)
TCJA Surcredit	2,249	5,238	9,874	12,634	12,720	11,118	7,972	4,560	1,931	936	829	968	71,029
Total Gas Cost Revenues	$74,366	$183,350	$345,593	$442,211	$507,387	$443,503	$318,002	$181,895	$77,034	$37,324	$40,953	$47,799	$2,699,417
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($127)	($201)	($314)	($380)	($384)	($345)	($268)	($184)	($119)	($93)	($91)	($95)	($2,601)
Total Revenues	$215,719	$407,038	$693,645	$864,493	$933,775	$826,673	$615,768	$386,465	$208,914	$141,061	$142,454	$153,562	$5,589,568
Unit Margin ($/Mcf)	$7.3580	$5.0001	$4.1276	$3.9137	$3.9253	$4.0355	$4.3737	$5.2532	$7.9966	$12.9820	$14.3309	$12.7941	$4.7645

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Proposed Rates)

Residential SATC	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	17,176	17,380	17,598	17,894	18,150	18,295	18,332	18,340	18,376	18,351	18,300	18,346	216,535
Total Volume	53,793	117,990	232,398	302,375	309,888	272,004	197,865	110,014	44,791	22,457	22,406	26,376	1,712,357
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96114	$2.96110	$2.96110	$2.96114
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$240,457	$243,313	$246,372	$250,516	$254,100	$256,130	$256,641	$256,760	$257,257	$256,907	$256,193	$256,844	$3,031,490
Volumetric Distribution Charge	159,286	349,385	688,163	895,375	917,622	805,442	585,906	325,767	132,632	66,498	66,346	78,102	5,070,525
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$399,743	$592,698	$934,535	$1,145,891	$1,171,722	$1,061,572	$842,547	$582,527	$389,889	$323,405	$322,539	$334,946	$8,102,015
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37558
TCJA Surcredit ($/Mcf)	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699	$0.11699
OPEB Surcredit ($/Mcf) - Rider I	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)	($0.22175)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$19,624	$43,373	$85,430	$111,153	$117,138	$102,818	$74,793	$41,585	$16,931	$8,489	$10,013	$11,787	$643,134
TCJA Surcredit	6,293	13,804	27,188	35,375	36,254	31,822	23,148	12,871	5,240	2,627	2,621	3,086	200,329
OPEB Surcredit - Rider I	(11,929)	(26,164)	(51,534)	(67,052)	(68,718)	(60,317)	(43,877)	(24,396)	(9,932)	(4,980)	(4,969)	(5,849)	(379,717)
Total Gas Cost Revenues	$13,988	$31,013	$61,084	$79,476	$84,674	$74,323	$54,064	$30,060	$12,239	$6,136	$7,665	$9,024	$463,746
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($360)	($533)	($841)	($1,031)	($1,055)	($955)	($758)	($524)	($351)	($291)	($290)	($301)	($7,290)
Total Revenues	$413,371	$623,178	$994,778	$1,224,336	$1,255,341	$1,134,940	$895,853	$612,063	$401,777	$329,250	$329,914	$343,669	$8,558,471
Unit Margin ($/Mcf)	$7.4311	$5.0233	$4.0213	$3.7896	$3.7811	$3.9028	$4.2582	$5.2950	$8.7046	$14.4011	$14.3952	$12.6989	$4.7315

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Detailed Billed Revenue Workpapers (Proposed Rates)

Residential MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	503	498	497	492	494	493	498	504	502	502	498	498	5,977
Total Volume	2,820	7,442	15,242	19,391	21,031	18,583	13,882	7,322	2,572	776	712	879	110,652
Base Non Gas Cost Rate:													
Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00
Volumetric Distribution Charge	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110	$2.96110
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	7,042	6,972	6,951	6,888	6,916	6,902	6,972	7,056	7,021	7,021	6,972	6,965	83,678
Volumetric Distribution Charge	8,350	22,037	45,133	57,419	62,275	55,026	41,106	21,681	7,616	2,298	2,108	2,603	327,652
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$15,392	$29,009	$52,084	$64,307	$69,191	$61,928	$48,078	$28,737	$14,637	$9,319	$9,080	$9,568	$411,330
Gas Cost Rates:													
MMT Gas Cost Charge	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.49000	$0.49000	$0.47030
OPEB Surcredit ($/Mcf) - Rider I	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06753)	($0.06751)
TCJA Surcredit ($/Mcf)	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327	$0.08327
Gas Cost Revenues													
MMT Gas Cost Charge	$1,325	$3,498	$7,164	$9,114	$9,885	$8,734	$6,525	$3,441	$1,209	$365	$349	$431	$52,040
OPEB Surcredit - Rider I	($190)	($503)	($1,029)	($1,309)	($1,420)	($1,255)	($937)	($494)	($174)	($52)	($48)	($59)	($7,470)
TCJA Surcredit	235	620	1,269	1,615	1,751	1,547	1,156	610	214	65	59	73	9,214
Total Gas Cost Revenues	$1,370	$3,615	$7,404	$9,420	$10,216	$9,026	$6,744	$3,557	$1,249	$378	$360	$445	$53,784
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($14)	($26)	($47)	($58)	($62)	($56)	($43)	($26)	($13)	($8)	($8)	($9)	($370)
Total Revenues	$16,748	$32,598	$59,441	$73,669	$79,345	$70,898	$54,779	$32,268	$15,873	$9,689	$9,432	$10,004	$464,744
Unit Margin ($/Mcf)	$5.4583	$3.8979	$3.4171	$3.3163	$3.2899	$3.3325	$3.4633	$3.9248	$5.6909	$12.0088	$12.7532	$10.8849	$3.7173

National Fuel Gas Distribution Corporation
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Detailed Billed Revenue Workpapers (Proposed Rates)

SCPA < 250 Sales	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	8,357	8,395	8,505	8,578	8,624	8,794	8,766	8,711	8,588	8,562	8,535	8,526	102,937
Total Volume	20,704	58,226	126,182	178,738	201,420	174,344	115,070	54,302	11,420	4,627	4,655	7,420	957,108
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29940	$2.29940	$2.29944
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01492	$0.01585	$0.01585	$0.01585	$0.01817	$0.01817	$0.01817	$0.01817	$0.01817	$0.01817	$0.02248	$0.02248	$0.01728
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$225,626	$226,652	$229,622	$231,593	$232,835	$237,425	$236,669	$235,197	$231,876	$231,174	$230,432	$230,189	$2,779,286
Volumetric Distribution Charge	47,607	133,887	290,148	410,997	463,153	400,894	264,597	124,864	26,260	10,640	10,704	17,062	2,200,811
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	309	923	2,000	2,833	3,661	3,169	2,091	987	208	84	105	167	16,536
Rider H - Gas Procurement Charge	2,379	6,690	14,498	20,537	23,143	20,032	13,222	6,239	1,312	532	535	853	109,972
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$275,920	$368,152	$536,268	$665,960	$722,792	$661,519	$516,578	$367,287	$259,655	$242,429	$241,775	$248,269	$5,106,604
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37464
Natural Gas Supply Charge ($/Mcf) - Rider A	$4.34390	$4.47320	$4.47320	$4.47320	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.21260	$5.21260	$4.80901
Gas Adjustment Charge ($/Mcf) - Rider A	($0.73630)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	$0.22230	$0.22230	($0.63246)
OPEB Surcredit ($/Mcf) - Rider I	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)
TCJA Surcredit ($/Mcf)	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$7,553	$21,404	$46,385	$65,704	$76,137	$65,902	$43,496	$20,526	$4,317	$1,749	$2,080	$3,316	$358,569
Natural Gas Supply Charge ($/Mcf) - Rider A	89,936	260,457	564,437	799,531	1,014,109	877,787	579,354	273,400	57,497	23,296	24,265	38,677	$4,602,746
Gas Adjustment Charge ($/Mcf) - Rider A	(15,244)	(37,340)	(80,921)	(114,625)	(129,171)	(111,807)	(73,794)	(34,824)	(7,324)	(2,967)	1,035	1,649	($605,333)
TCJA Surcredit	2,614	7,352	15,933	22,569	25,433	22,014	14,530	6,857	1,442	584	588	937	120,853
OPEB Surcredit - Rider I	(2,192)	(6,164)	(13,358)	(18,921)	(21,322)	(18,456)	(12,181)	(5,748)	(1,209)	(490)	(493)	(785)	(101,319)
Total Gas Cost Revenues	$82,667	$245,709	$532,476	$754,258	$965,186	$835,440	$551,405	$260,211	$54,723	$22,172	$27,475	$43,794	$4,375,516
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($248)	($331)	($483)	($599)	($651)	($595)	($465)	($331)	($234)	($218)	($218)	($223)	($4,596)
Total Revenues	$358,339	$613,530	$1,068,261	$1,419,619	$1,687,327	$1,496,364	$1,067,518	$627,167	$314,144	$264,383	$269,032	$291,840	$9,477,524
Unit Margin ($/Mcf)	$13.3269	$6.3228	$4.2500	$3.7259	$3.5885	$3.7943	$4.4892	$6.7638	$22.7369	$52.3945	$51.9387	$33.4595	$5.3355

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Detailed Billed Revenue Workpapers (Proposed Rates)

SCPA < 250 SATC	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	768	763	761	759	760	753	735	715	700	695	682	673	8,761
Total Volume	2,329	5,642	11,963	17,285	18,375	16,499	10,286	5,210	1,010	436	432	664	90,131
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29944	$2.29940	$2.29940	$2.29944
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$20,723	$20,588	$20,534	$20,493	$20,507	$20,318	$19,845	$19,292	$18,887	$18,765	$18,414	$18,171	$236,534
Volumetric Distribution Charge	5,355	12,973	27,508	39,746	42,252	37,938	23,652	11,980	2,322	1,003	993	1,527	207,251
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$26,078	$33,561	$48,042	$60,239	$62,759	$58,256	$43,497	$31,272	$21,209	$19,768	$19,407	$19,698	$443,784
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37449
TCJA Surcredit ($/Mcf)	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12627	$0.12628
OPEB Surcredit ($/Mcf) - Rider I	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10586)	($0.10587)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$850	$2,074	$4,398	$6,354	$6,946	$6,237	$3,888	$1,969	$382	$165	$193	$297	$33,753
TCJA Surcredit	294	712	1,511	2,183	2,320	2,083	1,299	658	128	55	55	84	11,382
OPEB Surcredit - Rider I	(247)	(597)	(1,266)	(1,830)	(1,945)	(1,747)	(1,089)	(552)	(107)	(46)	(46)	(70)	(9,542)
Total Gas Cost Revenues	$897	$2,189	$4,643	$6,707	$7,321	$6,573	$4,098	$2,075	$403	$174	$202	$311	$35,593
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($23)	($30)	($43)	($54)	($56)	($52)	($39)	($28)	($19)	($18)	($17)	($18)	($397)
Total Revenues	$26,952	$35,720	$52,642	$66,892	$70,024	$64,777	$47,556	$33,319	$21,593	$19,924	$19,592	$19,991	$478,980
Unit Margin ($/Mcf)	$11.1970	$5.9484	$4.0159	$3.4850	$3.4154	$3.5309	$4.2288	$6.0022	$20.9989	$45.3384	$44.9244	$29.6654	$4.9238

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SCPA < 250 MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	1,156	1,165	1,167	1,168	1,139	1,130	1,128	1,119	1,168	1,164	1,162	1,155	13,818
Total Volume	4,543	10,540	21,677	31,157	34,837	27,309	17,463	8,267	2,609	1,256	986	1,303	161,947
Base Non Gas Cost Rate:													
Basic Service Charge	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00	$27.00
Volumetric Distribution Charge	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940	$2.29940
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	31,212	31,442	31,496	31,536	30,740	30,510	30,456	30,200	31,536	31,428	31,361	31,172	373,086
Volumetric Distribution Charge	10,446	24,236	49,844	71,642	80,104	62,794	40,154	19,009	5,999	2,888	2,267	2,996	372,381
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$41,658	$55,677	$81,340	$103,178	$110,844	$93,304	$70,610	$49,209	$37,535	$34,316	$33,628	$34,168	$745,467
Gas Cost Rates:													
MMT Gas Cost Charge	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.49000	$0.49000	$0.47027
TCJA Surcredit ($/Mcf)	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983	$0.10983
OPEB Surcredit ($/Mcf) - Rider I	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)	($0.08357)
Gas Cost Revenues													
MMT Gas Cost Charge	$2,135	$4,954	$10,188	$14,644	$16,373	$12,835	$8,208	$3,885	$1,226	$590	$483	$638	$76,159
TCJA Surcredit	499	1,158	2,381	3,422	3,826	2,999	1,918	908	287	138	108	143	17,787
OPEB Surcredit - Rider I	(380)	(881)	(1,812)	(2,604)	(2,911)	(2,282)	(1,459)	(691)	(218)	(105)	(82)	(109)	(13,534)
Total Gas Cost Revenues	$2,254	$5,231	$10,757	$15,462	$17,288	$13,552	$8,667	$4,102	$1,295	$623	$509	$672	$80,412
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($37)	($50)	($73)	($93)	($100)	($84)	($64)	($44)	($34)	($31)	($30)	($31)	($671)
Total Revenues	$43,875	$60,858	$92,024	$118,547	$128,032	$106,772	$79,213	$53,267	$38,796	$34,908	$34,107	$34,809	$825,208
Unit Margin ($/Mcf)	$9.1697	$5.2825	$3.7523	$3.3116	$3.1818	$3.4166	$4.0434	$5.9524	$14.3868	$27.3217	$34.1052	$26.2223	$4.6032

National Fuel Gas Distribution Corporation
Pennsylvania Division
Normalized Historic Test Year Ended September 30, 2025
Detailed Billed Revenue Workpapers (Proposed Rates)

SCPA > 250 Sales	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	2,720	2,732	2,747	2,764	2,771	2,691	2,698	2,711	2,702	2,698	2,701	2,702	32,634
Total Volume	41,346	87,512	172,052	233,096	245,897	215,574	151,720	88,288	29,869	20,532	20,704	23,973	1,330,563
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01492	$0.01585	$0.01585	$0.01585	$0.01817	$0.01817	$0.01817	$0.01817	$0.01817	$0.01817	$0.02248	$0.02248	$0.01736
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$100,640	$101,084	$101,621	$102,250	$102,509	$99,567	$99,808	$100,307	$99,956	$99,826	$99,919	$99,974	$1,207,458
Volumetric Distribution Charge	84,987	179,881	353,653	479,129	505,441	443,112	311,860	181,476	61,396	42,204	42,557	49,277	2,734,972
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	617	1,387	2,727	3,695	4,469	3,918	2,757	1,605	543	373	465	539	23,095
Rider H - Gas Procurement Charge	4,751	10,055	19,769	26,783	28,254	24,769	17,433	10,144	3,432	2,359	2,379	2,755	152,882
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$190,994	$292,407	$477,769	$611,856	$640,672	$571,367	$431,858	$293,532	$165,326	$144,762	$145,320	$152,544	$4,118,407
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37605
Natural Gas Supply Charge ($/Mcf) - Rider A	$4.34390	$4.47320	$4.47320	$4.47320	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.21260	$5.21260	$4.81136
Gas Adjustment Charge ($/Mcf) - Rider A	($0.73630)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	$0.22230	$0.22230	($0.61526)
TCJA Surcredit ($/Mcf)	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507
OPEB Surcredit ($/Mcf) - Rider I	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$15,083	$32,169	$63,246	$85,686	$92,949	$81,487	$57,350	$33,373	$11,290	$7,761	$9,253	$10,714	$500,361
Natural Gas Supply Charge ($/Mcf) - Rider A	179,603	391,459	769,623	1,042,685	1,238,042	1,085,372	763,880	444,512	150,384	103,375	107,922	124,962	6,401,819
Gas Adjustment Charge ($/Mcf) - Rider A	(30,443)	(56,121)	(110,337)	(149,484)	(157,694)	(138,248)	(97,298)	(56,619)	(19,155)	(13,167)	4,602	5,329	(818,635)
TCJA Surcredit	3,104	6,570	12,916	17,499	18,459	16,183	11,390	6,628	2,242	1,541	1,554	1,800	99,886
OPEB Surcredit - Rider I	(4,867)	(10,301)	(20,252)	(27,438)	(28,945)	(25,375)	(17,859)	(10,392)	(3,516)	(2,417)	(2,437)	(2,822)	(156,621)
Total Gas Cost Revenues	$162,480	$363,776	$715,196	$968,948	$1,162,811	$1,019,419	$717,463	$417,502	$141,245	$97,093	$120,894	$139,983	$6,026,810
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($172)	($263)	($430)	($551)	($577)	($514)	($389)	($264)	($149)	($130)	($131)	($137)	($3,707)
Total Revenues	$353,302	$655,920	$1,192,535	$1,580,253	$1,802,906	$1,590,272	$1,148,932	$710,770	$306,422	$241,725	$266,083	$292,390	$10,141,510
Unit Margin ($/Mcf)	$4.6194	$3.3413	$2.7769	$2.6249	$2.6054	$2.6504	$2.8464	$3.3247	$5.5350	$7.0505	$7.0189	$6.3632	$3.0952

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Proposed Rates)

SCPA > 250 SATC	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	330	327	330	323	317	317	317	308	302	299	295	293	3,754
Total Volume	6,112	10,950	20,582	27,093	26,936	25,158	17,087	9,588	3,908	3,095	2,757	3,110	156,376
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$12,192	$12,099	$12,210	$11,933	$11,711	$11,729	$11,711	$11,378	$11,156	$11,063	$10,897	$10,823	$138,898
Volumetric Distribution Charge	12,563	22,508	42,306	55,690	55,367	51,712	35,122	19,708	8,033	6,362	5,667	6,393	321,431
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$24,755	$34,607	$54,516	$67,622	$67,077	$63,441	$46,833	$31,086	$19,188	$17,425	$16,564	$17,215	$460,329
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37617
TCJA Surcredit ($/Mcf)	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507	$0.07507
OPEB Surcredit ($/Mcf) - Rider I	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)	($0.11771)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$2,230	$4,025	$7,566	$9,959	$10,182	$9,510	$6,459	$3,624	$1,477	$1,170	$1,232	$1,390	$58,824
TCJA Surcredit	459	822	1,545	2,034	2,022	1,889	1,283	720	293	232	207	233	11,739
OPEB Surcredit - Rider I	(719)	(1,289)	(2,423)	(3,189)	(3,171)	(2,961)	(2,011)	(1,129)	(460)	(364)	(325)	(366)	(18,407)
Total Gas Cost Revenues	$1,970	$3,558	$6,688	$8,804	$9,033	$8,438	$5,731	$3,215	$1,310	$1,038	$1,114	$1,257	$52,156
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($22)	($31)	($49)	($61)	($60)	($57)	($42)	($28)	($17)	($16)	($15)	($15)	($413)
Total Revenues	$26,703	$38,134	$61,155	$76,365	$76,050	$71,822	$52,522	$34,273	$20,481	$18,447	$17,663	$18,457	$512,072
Unit Margin ($/Mcf)	$4.0502	$3.1604	$2.6487	$2.4959	$2.4903	$2.5217	$2.7408	$3.2421	$4.9100	$5.6300	$6.0078	$5.5354	$2.9437

National Fuel Gas Distribution Corporation
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Detailed Billed Revenue Workpapers (Proposed Rates)

SCPA > 250 MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	1,248	1,254	1,252	1,253	1,252	1,252	1,255	1,240	1,246	1,247	1,241	1,235	14,973
Total Volume	24,939	47,236	92,783	129,843	133,570	116,651	83,809	46,362	18,442	12,605	10,996	12,400	729,636
Base Non Gas Cost Rate:													
Basic Service Charge	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00	$37.00
Volumetric Distribution Charge	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550	$2.05550
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	46,176	46,398	46,324	46,343	46,324	46,324	46,417	45,880	46,084	46,139	45,899	45,695	554,001
Volumetric Distribution Charge	51,262	97,094	190,715	266,892	274,553	239,776	172,269	95,297	37,908	25,910	22,602	25,488	1,499,767
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$97,438	$143,492	$237,039	$313,235	$320,877	$286,100	$218,686	$141,177	$83,991	$72,049	$68,501	$71,183	$2,053,768
Gas Cost Rates:													
MMT Gas Cost Charge	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.49000	$0.49000	$0.47064
TCJA Surcredit ($/Mcf)	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847	$0.06847
OPEB Surcredit ($/Mcf) - Rider I	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)	($0.11305)
Gas Cost Revenues													
MMT Gas Cost Charge	$11,721	$22,201	$43,608	$61,026	$62,778	$54,826	$39,390	$21,790	$8,668	$5,924	$5,388	$6,076	$343,396
TCJA Surcredit	1,708	3,234	6,353	8,890	9,146	7,987	5,738	3,174	1,263	863	753	849	49,958
OPEB Surcredit - Rider I	(2,819)	(5,340)	(10,489)	(14,679)	(15,100)	(13,187)	(9,475)	(5,241)	(2,085)	(1,425)	(1,243)	(1,402)	(82,485)
Total Gas Cost Revenues	$10,610	$20,095	$39,472	$55,237	$56,824	$49,626	$35,653	$19,723	$7,846	$5,362	$4,898	$5,523	$310,869
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($88)	($129)	($213)	($282)	($289)	($257)	($197)	($127)	($76)	($65)	($62)	($64)	($1,849)
Total Revenues	$107,960	$163,458	$276,298	$368,190	$377,412	$335,469	$254,142	$160,773	$91,761	$77,346	$73,337	$76,642	$2,362,788
Unit Margin ($/Mcf)	$3.9071	$3.0378	$2.5548	$2.4124	$2.4023	$2.4526	$2.6093	$3.0451	$4.5543	$5.7159	$6.2296	$5.7406	$2.8148

National Fuel Gas Distribution Corporation
Pennsylvania Division
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Detailed Billed Revenue Workpapers (Proposed Rates)

LCPA Sales	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	453	453	461	473	479	457	446	443	444	444	438	440	5,428
Total Volume	36,381	63,926	108,834	141,390	152,957	139,524	111,628	70,115	37,262	52,814	26,516	28,876	970,223
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66224	$1.66224	$1.66224	$1.66224	$1.66224	$1.66224	$1.66220	$1.66220	$1.66222
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01492	$0.01585	$0.01585	$0.01585	$0.01817	$0.01817	$0.01817	$0.01817	$0.01817	$0.01817	$0.02248	$0.02248	$0.01755
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$68,403	$68,328	$69,536	$71,423	$72,254	$69,007	$67,271	$66,893	$66,969	$67,044	$66,063	$66,440	$819,628
Volumetric Distribution Charge	60,473	106,258	180,904	235,018	254,251	231,922	185,553	116,548	61,938	87,790	44,075	47,998	1,612,727
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	543	1,013	1,725	2,241	2,780	2,536	2,029	1,274	677	960	596	649	17,024
Rider H - Gas Procurement Charge	4,180	7,345	12,505	16,246	17,575	16,031	12,826	8,056	4,281	6,068	3,047	3,318	111,479
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$133,599	$182,944	$264,670	$324,928	$346,859	$319,496	$267,678	$192,771	$133,865	$161,862	$113,780	$118,405	$2,560,857
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37807
Natural Gas Supply Charge ($/Mcf) - Rider A	$4.34390	$4.47320	$4.47320	$4.47320	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.21260	$5.21260	$4.83720
Gas Adjustment Charge ($/Mcf) - Rider A	($0.73630)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	$0.22230	$0.22230	($0.59556)
TCJA Surcredit ($/Mcf)	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236
OPEB Surcredit ($/Mcf) - Rider I	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$13,272	$23,499	$40,007	$51,975	$57,818	$52,740	$42,195	$26,503	$14,085	$19,964	$11,850	$12,905	$366,813
Natural Gas Supply Charge ($/Mcf) - Rider A	158,035	285,954	486,836	632,466	770,108	702,475	562,025	353,015	187,607	265,908	138,217	150,519	4,693,165
Gas Adjustment Charge ($/Mcf) - Rider A	(26,787)	(40,996)	(69,795)	(90,673)	(98,091)	(89,477)	(71,587)	(44,965)	(23,896)	(33,870)	5,895	6,419	(577,823)
TCJA Surcredit	2,633	4,626	7,875	10,231	11,068	10,096	8,077	5,074	2,696	3,822	1,919	2,089	70,206
OPEB Surcredit - Rider I	(3,395)	(5,966)	(10,156)	(13,195)	(14,274)	(13,020)	(10,417)	(6,543)	(3,477)	(4,929)	(2,474)	(2,695)	(90,541)
Total Gas Cost Revenues	$143,758	$267,117	$454,767	$590,804	$726,629	$662,814	$530,293	$333,084	$177,015	$250,895	$155,407	$169,237	$4,461,820
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($120)	($165)	($238)	($292)	($312)	($288)	($241)	($173)	($120)	($146)	($102)	($107)	($2,304)
Total Revenues	$277,237	$449,896	$719,199	$915,440	$1,073,176	$982,022	$797,730	$525,682	$310,760	$412,611	$269,085	$287,535	$7,020,373
Unit Margin ($/Mcf)	$3.6722	$2.8618	$2.4319	$2.2981	$2.2677	$2.2899	$2.3979	$2.7494	$3.5925	$3.0648	$4.2910	$4.1005	$2.6395

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LCPA SATC	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	51	51	51	48	49	45	44	44	45	43	43	43	556
Total Volume	3,777	7,349	11,145	14,105	13,695	12,354	8,494	6,302	2,630	2,835	2,102	2,261	87,049
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66224	$1.66224	$1.66224	$1.66224	$1.66224	$1.66224	$1.66220	$1.66220	$1.66222
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$7,701	$7,701	$7,701	$7,248	$7,324	$6,795	$6,644	$6,644	$6,720	$6,493	$6,493	$6,418	$83,881
Volumetric Distribution Charge	6,278	12,216	18,525	23,445	22,764	20,535	14,119	10,475	4,372	4,712	3,494	3,758	144,695
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$13,979	$19,917	$26,226	$30,693	$30,088	$27,330	$20,763	$17,119	$11,091	$11,205	$9,987	$10,176	$228,575
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37698
TCJA Surcredit ($/Mcf)	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236
OPEB Surcredit ($/Mcf) - Rider I	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)	($0.09332)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$1,378	$2,701	$4,097	$5,185	$5,177	$4,670	$3,211	$2,382	$994	$1,072	$939	$1,010	$32,816
TCJA Surcredit	273	532	806	1,021	991	894	615	456	190	205	152	164	6,299
OPEB Surcredit - Rider I	(352)	(686)	(1,040)	(1,316)	(1,278)	(1,153)	(793)	(588)	(245)	(265)	(196)	(211)	(8,123)
Total Gas Cost Revenues	$1,299	$2,547	$3,863	$4,890	$4,890	$4,411	$3,033	$2,250	$939	$1,012	$895	$963	$30,992
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($13)	($18)	($24)	($28)	($27)	($25)	($19)	($15)	($10)	($10)	($9)	($9)	($207)
Total Revenues	$15,265	$22,446	$30,065	$35,555	$34,951	$31,716	$23,777	$19,354	$12,020	$12,207	$10,873	$11,130	$259,360
Unit Margin ($/Mcf)	$3.7011	$2.7101	$2.3532	$2.1761	$2.1970	$2.2123	$2.4444	$2.7165	$4.2172	$3.9525	$4.7512	$4.5005	$2.6258

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LCPA MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	1,007	1,003	1,003	1,001	996	983	978	975	975	977	982	980	11,858
Total Volume	149,560	296,435	532,465	637,115	727,487	621,402	580,528	365,572	183,190	169,051	118,136	121,749	4,502,690
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	151,982	151,453	151,378	151,076	150,396	148,433	147,678	147,225	147,150	147,527	148,282	147,980	1,790,558
Volumetric Distribution Charge	248,599	492,734	885,063	1,059,013	1,209,229	1,032,894	964,954	607,654	304,498	280,997	196,366	202,371	7,484,371
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$400,580	$644,187	$1,036,441	$1,210,088	$1,359,625	$1,181,327	$1,112,632	$754,879	$451,648	$428,524	$344,648	$350,351	$9,274,929
Gas Cost Rates:													
MMT Gas Cost Charge	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.49000	$0.49000	$0.47107
TCJA Surcredit ($/Mcf)	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872
OPEB Surcredit ($/Mcf) - Rider I	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)
Gas Cost Revenues													
MMT Gas Cost Charge	$70,293	$139,324	$250,259	$299,444	$341,919	$292,059	$272,848	$171,819	$86,099	$79,454	$57,887	$59,657	$2,121,062
TCJA Surcredit	7,287	14,442	25,942	31,040	35,443	30,275	28,283	17,811	8,925	8,236	5,756	5,932	219,372
OPEB Surcredit - Rider I	(18,019)	(35,714)	(64,151)	(76,760)	(87,648)	(74,867)	(69,942)	(44,044)	(22,071)	(20,367)	(14,233)	(14,668)	(542,484)
Total Gas Cost Revenues	$59,561	$118,052	$212,050	$253,724	$289,714	$247,467	$231,189	$145,586	$72,953	$67,323	$49,410	$50,921	$1,797,950
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($361)	($580)	($933)	($1,089)	($1,224)	($1,063)	($1,001)	($679)	($406)	($386)	($310)	($315)	($8,347)
Total Revenues	$459,780	$761,659	$1,247,558	$1,462,723	$1,648,115	$1,427,731	$1,342,820	$899,786	$524,195	$495,461	$393,748	$400,957	$11,064,532
Unit Margin ($/Mcf)	$2.6784	$2.1731	$1.9465	$1.8993	$1.8689	$1.9011	$1.9166	$2.0649	$2.4655	$2.5349	$2.9174	$2.8777	$2.0599

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LCPA DMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	14	14	14	14	14	13	13	13	13	13	13	13	161
Total Volume	54,979	67,699	81,230	117,176	100,887	101,604	92,597	76,980	54,279	51,300	53,610	50,898	903,240
Base Non Gas Cost Rate:													
Basic Service Charge	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00	$151.00
Volumetric Distribution Charge	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220	$1.66220
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	2,114	2,114	2,114	2,114	2,114	1,963	1,963	1,963	1,963	1,963	1,963	1,963	24,311
Volumetric Distribution Charge	91,386	112,530	135,021	194,770	167,695	168,887	153,914	127,956	90,222	85,271	89,111	84,602	1,501,365
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$93,500	$114,644	$137,135	$196,884	$169,809	$170,850	$155,877	$129,919	$92,185	$87,234	$91,074	$86,565	$1,525,676
Gas Cost Rates:													
TCJA Surcredit ($/Mcf)	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872	$0.04872
OPEB Surcredit ($/Mcf) - Rider I	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)	($0.12048)
Gas Cost Revenues													
TCJA Surcredit	2,679	3,298	3,958	5,709	4,915	4,950	4,511	3,750	2,644	2,499	2,612	2,480	44,005
OPEB Surcredit - Rider I	(6,624)	(8,156)	(9,787)	(14,117)	(12,155)	(12,241)	(11,156)	(9,275)	(6,539)	(6,181)	(6,459)	(6,132)	(108,822)
Total Gas Cost Revenues	($3,945)	($4,858)	($5,829)	($8,408)	($7,240)	($7,291)	($6,645)	($5,525)	($3,895)	($3,682)	($3,847)	($3,652)	($64,817)
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($84)	($103)	($123)	($177)	($153)	($154)	($140)	($117)	($83)	($79)	($82)	($78)	($1,373)
Total Revenues	$89,471	$109,683	$131,183	$188,299	$162,416	$163,405	$149,092	$124,277	$88,207	$83,473	$87,145	$82,835	$1,459,486
Unit Margin ($/Mcf)	$1.7007	$1.6934	$1.6882	$1.6802	$1.6832	$1.6815	$1.6834	$1.6877	$1.6984	$1.7005	$1.6988	$1.7008	$1.6891

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Natural Gas Vehicles	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	7	7	7	7	7	8	6	7	7	7	7	7	84
Total Volume	9,186	10,122	9,492	8,775	9,212	10,783	7,273	8,042	8,455	8,913	8,754	9,649	108,656
Base Non Gas Cost Rate:													
Volumetric Distribution Charge	$2.03680	$2.03680	$2.03680	$2.03680	$2.33700	$2.33700	$2.33700	$2.33700	$2.33700	$2.33700	$1.96470	$1.96470	$2.17013
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Volumetric Distribution Charge	18,710	20,616	19,333	17,873	21,528	25,200	16,997	18,794	19,759	20,830	17,199	18,957	235,798
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$18,710	$20,616	$19,333	$17,873	$21,528	$25,200	$16,997	$18,794	$19,759	$20,830	$17,199	$18,957	$235,798
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.38583
Natural Gas Supply Charge ($/Mcf) - Rider A	$4.34390	$4.47320	$4.47320	$4.47320	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.21260	$5.21260	$4.85977
Gas Adjustment Charge ($/Mcf) - Rider A	($0.73630)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	$0.22230	$0.22230	($0.50306)
TCJA Surcredit ($/Mcf)	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236	$0.07236
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$3,351	$3,721	$3,489	$3,226	$3,482	$4,076	$2,749	$3,040	$3,196	$3,369	$3,912	$4,312	$41,923
Natural Gas Supply Charge ($/Mcf) - Rider A	39,903	45,278	42,460	39,252	46,381	54,290	36,618	40,490	42,569	44,875	45,631	50,296	528,043
Gas Adjustment Charge ($/Mcf) - Rider A	(6,764)	(6,491)	(6,087)	(5,627)	(5,908)	(6,915)	(4,664)	(5,157)	(5,422)	(5,716)	1,946	2,145	(54,660)
TCJA Surcredit	665	732	687	635	667	780	526	582	612	645	633	698	7,862
Total Gas Cost Revenues	$37,155	$43,240	$40,549	$37,486	$44,622	$52,231	$35,229	$38,955	$40,955	$43,173	$52,122	$57,451	$523,168
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($17)	($19)	($17)	($16)	($19)	($23)	($15)	($17)	($18)	($19)	($15)	($17)	($212)
Total Revenues	$55,848	$63,837	$59,865	$55,343	$66,131	$77,408	$52,211	$57,732	$60,696	$63,984	$69,306	$76,391	$758,754
Unit Margin ($/Mcf)	$2.0368	$2.0368	$2.0368	$2.0368	$2.3370	$2.3370	$2.3370	$2.3370	$2.3370	$2.3370	$1.9647	$1.9647	$2.1701

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SVIS Sales	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	116	118	125	126	127	128	134	130	129	127	125	126	1,509
Total Volume	665	2,307	8,667	13,582	14,455	11,851	5,511	3,357	1,302	160	357	184	62,396
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01492	$0.01585	$0.01585	$0.01585	$0.01817	$0.01817	$0.01817	$0.01817	$0.01817	$0.01817	$0.02248	$0.02248	$0.01726
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$9,512	$9,676	$10,209	$10,332	$10,414	$10,496	$10,988	$10,660	$10,537	$10,373	$10,250	$10,291	$123,738
Volumetric Distribution Charge	1,379	4,780	17,959	28,145	29,953	24,557	11,419	6,957	2,697	332	740	380	129,298
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	10	37	137	215	263	215	100	61	24	3	8	4	1,077
Rider H - Gas Procurement Charge	76	265	996	1,561	1,661	1,362	633	386	150	18	41	21	7,169
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$10,977	$14,758	$29,301	$40,253	$42,290	$36,630	$23,141	$18,064	$13,407	$10,727	$11,039	$10,696	$261,282
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37438
Natural Gas Supply Charge ($/Mcf) - Rider A	$4.34390	$4.47320	$4.47320	$4.47320	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.21260	$5.21260	$4.80795
Gas Adjustment Charge ($/Mcf) - Rider A	($0.73630)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	$0.22230	$0.22230	($0.63485)
TCJA Surcredit ($/Mcf)	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10456
OPEB Surcredit ($/Mcf) - Rider I	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$243	$848	$3,186	$4,993	$5,464	$4,479	$2,083	$1,269	$492	$61	$160	$82	$23,360
Natural Gas Supply Charge ($/Mcf) - Rider A	2,890	10,319	38,767	60,755	72,776	59,665	27,745	16,903	6,553	807	1,861	957	299,998
Gas Adjustment Charge ($/Mcf) - Rider A	(490)	(1,479)	(5,558)	(8,710)	(9,270)	(7,600)	(3,534)	(2,153)	(835)	(103)	79	41	(39,612)
TCJA Surcredit	70	241	906	1,420	1,512	1,239	576	351	136	17	37	19	6,524
OPEB Surcredit - Rider I	(40)	(138)	(517)	(811)	(863)	(707)	(329)	(200)	(78)	(10)	(21)	(11)	(3,725)
Total Gas Cost Revenues	$2,673	$9,791	$36,784	$57,647	$69,619	$57,076	$26,541	$16,170	$6,268	$772	$2,116	$1,088	$286,545
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($10)	($13)	($26)	($36)	($38)	($33)	($21)	($16)	($12)	($10)	($10)	($10)	($235)
Total Revenues	$13,640	$24,536	$66,059	$97,864	$111,871	$93,673	$49,661	$34,218	$19,663	$11,489	$13,145	$11,774	$547,592
Unit Margin ($/Mcf)	$16.4972	$6.3975	$3.3809	$2.9637	$2.9257	$3.0910	$4.1992	$5.3804	$10.3007	$66.9152	$30.9130	$58.2913	$4.1875

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Pennsylvania Division
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SVIS SATC	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	10	10	11	10	10	11	12	13	11	11	11	11	130
Total Volume	48	128	466	697	808	872	550	274	50	153	15	20	4,081
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$820	$820	$861	$820	$820	$902	$984	$1,025	$902	$902	$902	$902	$10,660
Volumetric Distribution Charge	99	265	966	1,444	1,674	1,807	1,140	568	104	317	31	41	8,457
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$919	$1,085	$1,827	$2,264	$2,494	$2,709	$2,124	$1,593	$1,006	$1,219	$933	$943	$19,117
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37540
TCJA Surcredit ($/Mcf)	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10457	$0.10463
OPEB Surcredit ($/Mcf) - Rider I	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05970)	($0.05979)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$18	$47	$171	$256	$305	$330	$208	$104	$19	$58	$7	$9	$1,532
TCJA Surcredit	5	13	49	73	84	91	58	29	5	16	2	2	427
OPEB Surcredit - Rider I	(3)	(8)	(28)	(42)	(48)	(52)	(33)	(16)	(3)	(9)	(1)	(1)	(244)
Total Gas Cost Revenues	$20	$52	$192	$287	$341	$369	$233	$117	$21	$65	$8	$10	$1,715
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($1)	($1)	($2)	($2)	($2)	($2)	($2)	($1)	($1)	($1)	($1)	($1)	($17)
Total Revenues	$938	$1,136	$2,017	$2,549	$2,833	$3,076	$2,355	$1,709	$1,026	$1,283	$940	$952	$20,815
Unit Margin ($/Mcf)	$19.1555	$8.4785	$3.9198	$3.2487	$3.0871	$3.1066	$3.8613	$5.8131	$20.1122	$7.9676	$62.2055	$47.1722	$4.6843

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SVIS MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	64	65	64	64	64	63	63	63	63	63	63	63	762
Total Volume	649	2,930	5,044	8,606	9,518	6,749	3,878	1,703	666	4,821	264	301	45,129
Base Non Gas Cost Rate:													
Basic Service Charge	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00	$82.00
Volumetric Distribution Charge	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220	$2.07220
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	5,248	5,330	5,248	5,248	5,248	5,166	5,166	5,166	5,166	5,166	5,166	5,166	62,484
Volumetric Distribution Charge	1,345	6,072	10,451	17,834	19,724	13,985	8,036	3,528	1,379	9,991	547	623	93,516
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$6,593	$11,402	$15,699	$23,082	$24,972	$19,151	$13,202	$8,694	$6,545	$15,157	$5,713	$5,789	$156,000
Gas Cost Rates:													
MMT Gas Cost Charge	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.49000	$0.49000	$0.47023
TCJA Surcredit ($/Mcf)	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296	$0.09296
OPEB Surcredit ($/Mcf) - Rider I	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)	($0.02353)
Gas Cost Revenues													
MMT Gas Cost Charge	$305	$1,377	$2,370	$4,045	$4,474	$3,172	$1,823	$800	$313	$2,266	$129	$147	$21,221
TCJA Surcredit	60	272	469	800	885	627	361	158	62	448	25	28	4,195
OPEB Surcredit - Rider I	(15)	(69)	(119)	(203)	(224)	(159)	(91)	(40)	(16)	(113)	(6)	(7)	(1,062)
Total Gas Cost Revenues	$350	$1,580	$2,720	$4,642	$5,135	$3,640	$2,093	$918	$359	$2,601	$148	$168	$24,354
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($6)	($10)	($14)	($21)	($22)	($17)	($12)	($8)	($6)	($14)	($5)	($5)	($140)
Total Revenues	$6,937	$12,972	$18,405	$27,703	$30,085	$22,774	$15,283	$9,604	$6,898	$17,744	$5,856	$5,952	$180,214
Unit Margin ($/Mcf)	$10.1572	$3.8911	$3.1127	$2.6820	$2.6236	$2.8377	$3.4043	$5.1064	$9.8336	$3.1437	$21.6256	$19.2521	$3.4568

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IVIS Sales	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	59	60	59	57	57	57	53	53	54	54	51	52	665
Total Volume	9,501	12,234	20,860	36,140	38,828	32,288	21,695	13,198	7,599	4,931	6,495	6,738	210,506
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
Rider G - Merchant Function Charge	$0.01492	$0.01585	$0.01585	$0.01585	$0.01817	$0.01817	$0.01817	$0.01817	$0.01817	$0.01817	$0.02248	$0.02248	$0.01753
Rider H - Gas Procurement Charge	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490	$0.11490
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$14,868	$15,120	$14,868	$14,364	$14,364	$14,364	$13,356	$13,356	$13,482	$13,482	$12,852	$12,978	$167,454
Volumetric Distribution Charge	12,680	16,328	27,842	48,236	51,824	43,094	28,957	17,615	10,142	6,581	8,668	8,994	280,962
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
Rider G - Merchant Function Charge	142	194	331	573	706	587	394	240	138	90	146	151	3,691
Rider H - Gas Procurement Charge	1,092	1,406	2,397	4,153	4,461	3,710	2,493	1,516	873	567	746	774	24,187
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$28,782	$33,048	$45,437	$67,326	$71,355	$61,755	$45,200	$32,727	$24,635	$20,720	$22,412	$22,897	$476,294
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37831
Natural Gas Supply Charge ($/Mcf) - Rider A	$4.34390	$4.47320	$4.47320	$4.47320	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.03480	$5.21260	$5.21260	$4.83010
Gas Adjustment Charge ($/Mcf) - Rider A	($0.73630)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	($0.64130)	$0.22230	$0.22230	($0.59129)
TCJA Surcredit ($/Mcf)	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461
OPEB Surcredit ($/Mcf) - Rider I	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$3,466	$4,497	$7,668	$13,285	$14,677	$12,205	$8,201	$4,989	$2,872	$1,864	$2,902	$3,011	$79,637
Natural Gas Supply Charge ($/Mcf) - Rider A	41,270	54,724	93,311	161,662	195,492	162,562	109,232	66,448	38,258	24,827	33,853	35,124	1,016,763
Gas Adjustment Charge ($/Mcf) - Rider A	(6,995)	(7,845)	(13,377)	(23,177)	(24,900)	(20,706)	(13,913)	(8,464)	(4,873)	(3,162)	1,444	1,498	(124,470)
TCJA Surcredit	519	668	1,139	1,974	2,120	1,763	1,185	721	415	269	355	368	11,496
OPEB Surcredit - Rider I	(1,274)	(1,641)	(2,798)	(4,847)	(5,208)	(4,331)	(2,910)	(1,770)	(1,019)	(661)	(871)	(904)	(28,234)
Total Gas Cost Revenues	$36,986	$50,403	$85,943	$148,897	$182,181	$151,493	$101,795	$61,924	$35,653	$23,137	$37,683	$39,097	$955,192
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($26)	($30)	($41)	($61)	($64)	($56)	($41)	($29)	($22)	($19)	($20)	($21)	($430)
Total Revenues	$65,742	$83,421	$131,339	$216,162	$253,472	$213,192	$146,954	$94,622	$60,266	$43,838	$60,075	$61,973	$1,431,056
Unit Margin ($/Mcf)	$3.0295	$2.7014	$2.1782	$1.8629	$1.8377	$1.9127	$2.0834	$2.4798	$3.2420	$4.2019	$3.4510	$3.3981	$2.2626

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IVIS SATC	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	3	3	3	4	4	3	3	3	3	3	3	3	38
Total Volume	18	226	740	1,699	1,456	988	965	447	99	14	4	9	6,665
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
Rider E - Customer Education	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000	$0.00000
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	$756	$756	$756	$1,008	$1,008	$756	$756	$756	$756	$756	$756	$756	$9,576
Volumetric Distribution Charge	24	302	988	2,268	1,943	1,319	1,288	597	132	19	5	12	8,896
Rider E - Customer Education	0	0	0	0	0	0	0	0	0	0	0	0	0
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$780	$1,058	$1,744	$3,276	$2,951	$2,075	$2,044	$1,353	$888	$775	$761	$768	$18,472
Gas Cost Rates:													
Distribution Charge ($/Mcf) - Rider A	$0.36480	$0.36760	$0.36760	$0.36760	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.37800	$0.44690	$0.44690	$0.37388
TCJA Surcredit ($/Mcf)	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05461	$0.05431
OPEB Surcredit ($/Mcf) - Rider I	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13413)	($0.13398)
Gas Cost Revenues													
Distribution Charge ($/Mcf) - Rider A	$7	$83	$272	$625	$550	$373	$365	$169	$37	$5	$2	$4	$2,492
TCJA Surcredit	1	12	40	93	79	54	53	24	5	1	0	0	362
OPEB Surcredit - Rider I	(2)	(30)	(99)	(228)	(195)	(133)	(129)	(60)	(13)	(2)	(1)	(1)	(893)
Total Gas Cost Revenues	$6	$65	$213	$490	$434	$294	$289	$133	$29	$4	$1	$3	$1,961
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.10%
Rider B - State Tax Adjustment	($1)	($1)	($2)	($3)	($3)	($2)	($2)	($1)	($1)	($1)	($1)	($1)	($19)
Total Revenues	$785	$1,122	$1,955	$3,763	$3,382	$2,367	$2,331	$1,485	$916	$778	$761	$770	$20,414
Unit Margin ($/Mcf)	$43.3347	$4.6739	$2.3560	$1.9280	$2.0272	$2.0999	$2.1181	$3.0260	$8.9711	$55.3347	$190.3347	$85.3347	$2.7714

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IVIS MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	262	264	264	264	264	264	263	264	261	261	262	259	3,151
Total Volume	115,719	156,127	186,292	261,371	328,793	289,140	228,299	166,918	125,632	116,316	111,196	123,660	2,209,460
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	66,024	66,402	66,402	66,528	66,528	66,528	66,276	66,402	65,772	65,772	66,024	65,268	793,926
Volumetric Distribution Charge	154,450	208,382	248,644	348,851	438,839	385,915	304,710	222,785	167,681	155,247	148,413	165,049	2,948,967
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$220,474	$274,784	$315,046	$415,379	$505,367	$452,443	$370,986	$289,187	$233,453	$221,019	$214,437	$230,317	$3,742,893
Gas Cost Rates:													
MMT Gas Cost Charge	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.49000	$0.49000	$0.47213
TCJA Surcredit ($/Mcf)	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960
OPEB Surcredit ($/Mcf) - Rider I	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)
Gas Cost Revenues													
MMT Gas Cost Charge	$54,388	$73,379	$87,557	$122,844	$154,533	$135,896	$107,300	$78,451	$59,047	$54,669	$54,486	$60,594	$1,043,144
TCJA Surcredit	4,582	6,183	7,377	10,350	13,020	11,450	9,041	6,610	4,975	4,606	4,403	4,897	87,494
OPEB Surcredit - Rider I	(7,630)	(10,295)	(12,284)	(17,235)	(21,681)	(19,066)	(15,054)	(11,007)	(8,284)	(7,670)	(7,332)	(8,154)	(145,692)
Total Gas Cost Revenues	$51,340	$69,267	$82,650	$115,959	$145,872	$128,280	$101,287	$74,054	$55,738	$51,605	$51,557	$57,337	$984,946
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($198)	($247)	($284)	($374)	($455)	($407)	($334)	($260)	($210)	($199)	($193)	($207)	($3,368)
Total Revenues	$271,616	$343,804	$397,412	$530,964	$650,784	$580,316	$471,939	$362,981	$288,981	$272,425	$265,801	$287,447	$4,724,471
Unit Margin ($/Mcf)	$1.9053	$1.7600	$1.6911	$1.5892	$1.5370	$1.5648	$1.6250	$1.7325	$1.8582	$1.9002	$1.9285	$1.8625	$1.6940

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IVIS DMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	24	24	24	24	24	24	25	25	26	26	26	26	298
Total Volume	37,967	49,449	53,613	76,570	97,129	82,799	75,166	60,733	50,263	45,497	43,636	41,260	714,082
Base Non Gas Cost Rate:													
Basic Service Charge	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00	$252.00
Volumetric Distribution Charge	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470	$1.33470
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	6,048	6,048	6,048	6,048	6,048	6,048	6,300	6,300	6,552	6,552	6,552	6,552	75,096
Volumetric Distribution Charge	50,675	66,000	71,558	102,198	129,638	110,511	100,324	81,061	67,087	60,725	58,240	55,069	953,086
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$56,723	$72,048	$77,606	$108,246	$135,686	$116,559	$106,624	$87,361	$73,639	$67,277	$64,792	$61,621	$1,028,182
Gas Cost Rates:													
TCJA Surcredit ($/Mcf)	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960	$0.03960
OPEB Surcredit ($/Mcf) - Rider I	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)	($0.06594)
Gas Cost Revenues													
TCJA Surcredit	1,504	1,958	2,123	3,032	3,846	3,279	2,977	2,405	1,990	1,802	1,728	1,634	28,278
OPEB Surcredit - Rider I	(2,504)	(3,261)	(3,535)	(5,049)	(6,405)	(5,460)	(4,956)	(4,005)	(3,314)	(3,000)	(2,877)	(2,721)	(47,087)
Total Gas Cost Revenues	($1,000)	($1,303)	($1,412)	($2,017)	($2,559)	($2,181)	($1,979)	($1,600)	($1,324)	($1,198)	($1,149)	($1,087)	($18,809)
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($51)	($65)	($70)	($97)	($122)	($105)	($96)	($79)	($66)	($61)	($58)	($55)	($925)
Total Revenues	$55,672	$70,680	$76,124	$106,132	$133,005	$114,273	$104,549	$85,682	$72,249	$66,018	$63,585	$60,479	$1,008,448
Unit Margin ($/Mcf)	$1.4940	$1.4570	$1.4475	$1.4137	$1.3970	$1.4077	$1.4185	$1.4384	$1.4651	$1.4787	$1.4849	$1.4935	$1.4399

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LVIS MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	8	8	8	8	8	8	8	8	8	8	8	8	96
Total Volume	30,073	37,091	41,537	40,962	49,392	40,352	42,930	47,531	42,410	40,298	35,752	44,035	492,363
Base Non Gas Cost Rate:													
Basic Service Charge	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00
Volumetric Distribution Charge	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	8,184	8,184	8,184	8,184	8,184	8,184	8,184	8,184	8,184	8,184	8,184	8,184	98,208
Volumetric Distribution Charge	30,804	37,992	42,546	41,957	50,592	41,333	43,973	48,686	43,441	41,277	36,621	45,105	504,327
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$38,988	$46,176	$50,730	$50,141	$58,776	$49,517	$52,157	$56,870	$51,625	$49,461	$44,805	$53,289	$602,535
Gas Cost Rates:													
MMT Gas Cost Charge	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.49000	$0.49000	$0.47324
TCJA Surcredit ($/Mcf)	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.00000
OPEB Surcredit ($/Mcf) - Rider I	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)
Gas Cost Revenues													
MMT Gas Cost Charge	$14,134	$17,433	$19,522	$19,252	$23,214	$18,965	$20,177	$22,340	$19,933	$18,940	$17,518	$21,577	$233,005
TCJA Surcredit	851	1,049	1,175	1,159	1,397	1,142	1,214	1,345	1,200	1,140	1,011	1,246	13,929
OPEB Surcredit - Rider I	(1,865)	(2,300)	(2,575)	(2,540)	(3,062)	(2,502)	(2,662)	(2,947)	(2,629)	(2,498)	(2,217)	(2,730)	(30,527)
Total Gas Cost Revenues	$13,120	$16,182	$18,122	$17,871	$21,549	$17,605	$18,729	$20,738	$18,504	$17,582	$16,312	$20,093	$216,407
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($35)	($42)	($46)	($45)	($53)	($45)	($47)	($51)	($46)	($45)	($40)	($48)	($543)
Total Revenues	$52,073	$62,316	$68,806	$67,967	$80,272	$67,077	$70,839	$77,557	$70,083	$66,998	$61,077	$73,334	$818,399
Unit Margin ($/Mcf)	$1.2964	$1.2449	$1.2213	$1.2241	$1.1900	$1.2271	$1.2149	$1.1965	$1.2173	$1.2274	$1.2532	$1.2102	$1.2238

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LVIS DMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	21	21	21	21	21	21	19	19	19	19	19	19	240
Total Volume	118,195	140,776	153,578	185,802	239,968	213,066	175,193	134,375	127,065	110,366	137,384	92,473	1,828,242
Base Non Gas Cost Rate:													
Basic Service Charge	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00	$1,023.00
Volumetric Distribution Charge	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430	$1.02430
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	21,483	20,972	21,483	21,483	21,483	21,483	19,437	19,437	19,437	19,437	19,437	19,437	245,009
Volumetric Distribution Charge	121,068	144,197	157,310	190,317	245,799	218,244	179,450	137,641	130,153	113,048	140,723	94,720	1,872,668
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$142,551	$165,168	$178,793	$211,800	$267,282	$239,727	$198,887	$157,078	$149,590	$132,485	$160,160	$114,157	$2,117,677
Gas Cost Rates:													
TCJA Surcredit ($/Mcf)	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829	$0.02829
OPEB Surcredit ($/Mcf) - Rider I	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)	($0.06200)
Gas Cost Revenues													
TCJA Surcredit	3,344	3,983	4,345	5,256	6,789	6,028	4,956	3,801	3,595	3,122	3,887	2,616	51,722
OPEB Surcredit - Rider I	(7,328)	(8,728)	(9,522)	(11,520)	(14,878)	(13,210)	(10,862)	(8,331)	(7,878)	(6,843)	(8,518)	(5,733)	(113,351)
Total Gas Cost Revenues	($3,984)	($4,745)	($5,177)	($6,264)	($8,089)	($7,182)	($5,906)	($4,530)	($4,283)	($3,721)	($4,631)	($3,117)	($61,629)
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($128)	($149)	($161)	($191)	($241)	($216)	($179)	($141)	($135)	($119)	($144)	($103)	($1,907)
Total Revenues	$138,439	$160,274	$173,455	$205,345	$258,952	$232,329	$192,802	$152,407	$145,172	$128,645	$155,385	$110,937	$2,054,141
Unit Margin ($/Mcf)	$1.2061	$1.1733	$1.1642	$1.1399	$1.1138	$1.1251	$1.1352	$1.1689	$1.1773	$1.2004	$1.1658	$1.2345	$1.1583

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LIS MMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	1	1	1	1	1	1	1	1	1	1	1	1	12
Total Volume	30,946	30,426	32,253	29,558	35,804	32,014	33,409	30,961	29,869	26,644	26,501	27,507	365,892
Base Non Gas Cost Rate:													
Basic Service Charge	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00
Volumetric Distribution Charge	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	1,165	13,980
Volumetric Distribution Charge	18,546	18,234	19,329	17,714	21,457	19,186	20,022	18,555	17,900	15,968	15,882	16,485	219,279
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$19,711	$19,399	$20,494	$18,879	$22,622	$20,351	$21,187	$19,720	$19,065	$17,133	$17,047	$17,650	$233,259
Gas Cost Rates:													
MMT Gas Cost Charge	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.47000	$0.49000	$0.49000	$0.47295
TCJA Surcredit ($/Mcf)	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155
OPEB Surcredit ($/Mcf) - Rider I	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)
Gas Cost Revenues													
MMT Gas Cost Charge	$14,545	$14,300	$15,159	$13,892	$16,828	$15,047	$15,702	$14,552	$14,038	$12,523	$12,985	$13,478	$173,049
TCJA Surcredit	357	351	373	341	414	370	386	358	345	308	306	318	4,227
OPEB Surcredit - Rider I	(432)	(425)	(450)	(413)	(500)	(447)	(466)	(432)	(417)	(372)	(370)	(384)	(5,108)
Total Gas Cost Revenues	$14,470	$14,226	$15,082	$13,820	$16,742	$14,970	$15,622	$14,478	$13,966	$12,459	$12,921	$13,412	$172,168
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($18)	($17)	($18)	($17)	($20)	($18)	($19)	($18)	($17)	($15)	($15)	($16)	($208)
Total Revenues	$34,163	$33,608	$35,558	$32,682	$39,344	$35,303	$36,790	$34,180	$33,014	$29,577	$29,953	$31,046	$405,219
Unit Margin ($/Mcf)	$0.6369	$0.6376	$0.6354	$0.6387	$0.6318	$0.6357	$0.6342	$0.6369	$0.6383	$0.6430	$0.6433	$0.6417	$0.6375

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LIS DMT	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	9	9	9	9	9	9	10	10	10	10	10	10	114
Total Volume	224,392	255,936	285,279	367,115	425,555	390,398	382,886	286,135	215,840	177,881	208,138	198,815	3,418,371
Base Non Gas Cost Rate:													
Basic Service Charge	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00
Volumetric Distribution Charge	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930	$0.59930
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	10,485	10,485	10,485	10,485	10,485	10,485	11,650	11,650	11,650	11,650	11,650	11,650	132,810
Volumetric Distribution Charge	134,478	153,383	170,968	220,012	255,035	233,966	229,464	171,481	129,353	106,604	124,737	119,150	2,048,629
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$144,963	$163,868	$181,453	$230,497	$265,520	$244,451	$241,114	$183,131	$141,003	$118,254	$136,387	$130,800	$2,181,439
Gas Cost Rates:													
TCJA Surcredit ($/Mcf)	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155	$0.01155
OPEB Surcredit ($/Mcf) - Rider I	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.00241)
Gas Cost Revenues													
TCJA Surcredit	2,592	2,956	3,295	4,240	4,915	4,509	4,422	3,305	2,493	2,055	2,404	2,296	39,482
OPEB Surcredit - Rider I	(3,133)	(3,573)	(3,982)	(5,125)	(5,941)	(5,450)	(5,345)	(3,994)	(3,013)	(2,483)	(2,906)	(2,775)	(47,720)
Total Gas Cost Revenues	($541)	($617)	($687)	($885)	($1,026)	($941)	($923)	($689)	($520)	($428)	($502)	($479)	($8,238)
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($130)	($147)	($163)	($207)	($239)	($220)	($217)	($165)	($127)	($106)	($123)	($118)	($1,962)
Total Revenues	$144,292	$163,104	$180,603	$229,405	$264,255	$243,290	$239,974	$182,277	$140,356	$117,720	$135,762	$130,203	$2,171,239
Unit Margin ($/Mcf)	$0.6460	$0.6403	$0.6361	$0.6279	$0.6239	$0.6262	$0.6297	$0.6400	$0.6533	$0.6648	$0.6553	$0.6579	$0.6382

National Fuel Gas Distribution Corporation
Pennsylvania Division
Normalized Historic Test Year Ended September 30, 2025
Detailed Billed Revenue Workpapers (Proposed Rates)

LIS DMT Negotiated	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Total
Customers	10	10	10	10	10	10	10	10	10	10	10	10	120
Total Volume	587,209	606,268	655,915	711,269	827,660	737,595	770,674	612,741	579,840	527,486	581,920	551,544	7,750,120
Base Non Gas Cost Rate:													
Basic Service Charge	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00	$1,165.00
Volumetric Distribution Charge	$0.31410	$0.31360	$0.30200	$0.30180	$0.28770	$0.29000	$0.28820	$0.29660	$0.29190	$0.32410	$0.30250	$0.31680	$0.30118
DSIC - Distribution System Improvement Charge	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Base Non Gas Cost Rate Revenue:													
Basic Service Charge	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	11,650	139,800
Volumetric Distribution Charge	184,442	190,126	198,086	214,661	238,118	213,902	222,108	181,739	169,255	170,958	176,031	174,729	2,334,156
DSIC - Distribution System Improvement Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Base Non Gas Cost Rate Revenue	$196,092	$201,776	$209,736	$226,311	$249,768	$225,552	$233,758	$193,389	$180,905	$182,608	$187,681	$186,379	$2,473,956
Gas Cost Rates:													
OPEB Surcredit ($/Mcf) - Rider I	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)	($0.01396)
Gas Cost Revenues													
OPEB Surcredit - Rider I	(8,197)	(8,463)	(9,157)	(9,929)	(11,554)	(10,297)	(10,759)	(8,554)	(8,095)	(7,364)	(8,124)	(7,700)	(108,193)
Total Gas Cost Revenues	($8,197)	($8,463)	($9,157)	($9,929)	($11,554)	($10,297)	($10,759)	($8,554)	($8,095)	($7,364)	($8,124)	($7,700)	($108,193)
Rider B - State Tax Adjustment %	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
Rider B - State Tax Adjustment	($176)	($182)	($189)	($204)	($225)	($203)	($210)	($174)	($163)	($164)	($169)	($168)	($2,227)
Total Revenues	$187,719	$193,131	$200,390	$216,178	$237,989	$215,052	$222,789	$184,661	$172,647	$175,080	$179,388	$178,511	$2,363,536
Unit Margin ($/Mcf)	$0.3339	$0.3328	$0.3198	$0.3182	$0.3018	$0.3058	$0.3033	$0.3156	$0.3120	$0.3462	$0.3225	$0.3379	$0.3192

NATIONAL FUEL EXHIBIT CTM-8

RATE DESIGN

National Fuel Gas Distribution Corporation
Pennsylvania Division
Twelve Months Ended October 31, 2027
Residential Current Base Rates Vs. Proposed Base Rates

Description	Customers	Volumes (Mcf)	Current Base Rate ($/Mcf)	Current Revenue ($)	Proposed Base Rate ($/Mcf)	Proposed Revenue ($)	Change in Revenues ($)	% Change
Residential Sales								
Basic Service Charge	2,091,764		$14.0000	$ 29,284,703	$19.0000	$ 39,743,525	$ 10,458,822	36%
Volumetric Distribution Charge		16,570,240	$2.9611	$ 49,066,137	$3.3780	$ 55,974,984	$ 6,908,847	14%
Rider B - State Tax Adjustment			-0.27%	$ (233,650)	0.00%	$ -	$ 233,650	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
Rider G - Merchant Function Charge			$0.0944	$ 1,564,787	$0.0952	$ 1,577,362	$ 12,575	1%
Rider H - Gas Procurement Charge			$0.1149	$ 1,903,921	$0.1149	$ 1,903,921	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 4,090,977	0.00%	$ -	$ (4,090,977)	-100%
Total Margin				$ 85,676,875		$ 99,199,791	$ 13,522,916	16%
Residential CAP								
Basic Service Charge	77,741		$14.0000	$ 1,088,381	$19.0000	$ 1,477,088	$ 388,707	36%
Volumetric Distribution Charge		681,296	$2.9611	$ 2,017,384	$3.3780	$ 2,301,446	$ 284,061	14%
Rider B - State Tax Adjustment			-0.27%	$ (9,307)	0.00%	$ -	$ 9,307	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
Rider G - Merchant Function Charge			$0.0944	$ 64,337	$0.0952	$ 64,854	$ 517	1%
Rider H - Gas Procurement Charge			$0.1149	$ 78,281	$0.1149	$ 78,281	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 162,419	0.00%	$ -	$ (162,419)	-100%
Total Margin				$ 3,401,495		$ 3,921,669	$ 520,174	15%
Residential SATC								
Basic Service Charge	198,694		$14.0000	$ 2,781,713	$19.0000	$ 3,775,182	$ 993,469	36%
Volumetric Distribution Charge		1,591,601	$2.9611	$ 4,712,891	$3.3780	$ 5,376,498	$ 663,607	14%
Rider B - State Tax Adjustment			-0.27%	$ (21,414)	0.00%	$ -	$ 21,414	
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 374,730	0.00%	$ -	$ (374,730)	-100%
Total Margin				$ 7,847,920		$ 9,151,680	$ 1,303,760	17%
Residential MMT								
Basic Service Charge	5,701		$14.0000	$ 79,818	$19.0000	$ 108,324	$ 28,506	36%
Volumetric Distribution Charge		115,189	$2.9611	$ 341,087	$3.3780	$ 389,115	$ 48,027	14%
Rider B - State Tax Adjustment			-0.27%	$ (1,197)	0.00%	$ -	$ 1,197	-100%
DSIC - Distribution System Improvement Charge			5.00%	$ 21,045	0.00%	$ -	$ (21,045)	-100%
Total Margin				$ 440,753		$ 497,439	$ 56,686	13%
Residential Total								
Basic Service Charge	2,373,901		$14.0000	$ 33,234,614	$19.0000	$ 45,104,119	$ 11,869,505	36%
Volumetric Distribution Charge		18,958,326	$2.9611	$ 56,137,499	$3.3780	$ 64,042,042	$ 7,904,543	14%
Rider B - State Tax Adjustment		18,958,326	-0.27%	$ (265,568)	0.00%	$ -	$ 265,568	-100%
Rider E - Customer Education		18,958,326	$0.0000	$ -	$0.0000	$ -	$ -	0%
Rider G - Merchant Function Charge		17,251,535	$0.0944	$ 1,629,124	$0.0952	$ 1,642,216	$ 13,092	1%
Rider H - Gas Procurement Charge		17,251,535	$0.1149	$ 1,982,201	$0.1149	$ 1,982,201	$ -	0%
DSIC - Distribution System Improvement Charge		18,958,326	5.00%	$ 4,649,172	0.00%	$ -	$ (4,649,172)	-100%
Total Margin				$ 97,367,043		$ 112,770,578	$ 15,403,535	16%
Target Revenue						**$ 112,770,578**		

National Fuel Gas Distribution Corporation
Pennsylvania Division
Small Commercial/Public Authority Current Base Rates Vs. Proposed Base Rates
Twelve Months Ended October 31, 2027

Description	Customers	Volumes (Mcf)	Current Base Rate ($/Mcf)	Current Revenue ($)	Proposed Base Rate ($/Mcf)	Proposed Revenue ($)	Change in Revenues ($)	% Change
Small Commercial < 250 Sales								
Basic Service Charge	98,168		$27.0000	$ 2,650,536	$30.0000	$ 2,945,040	$ 294,504	11%
Volumetric Distribution Charge		903,474	$2.2994	$ 2,077,448	$2.9237	$ 2,641,490	$ 564,042	27%
Rider B - State Tax Adjustment			-0.27%	$ (13,866)	0.00%	$ -	$ 13,866	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
Rider G - Merchant Function Charge			$0.0178	$ 16,078	$0.0217	$ 19,572	$ 3,495	22%
Rider H - Gas Procurement Charge			$0.1149	$ 103,809	$0.1149	$ 103,809	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 242,394	0.00%	$ -	$ (242,394)	-100%
Total Margin				$ 5,076,399		$ 5,709,912	$ 633,513	12%
Small Commercial < 250 SATC								
Basic Service Charge	7,065		$27.0000	$ 190,755	$30.0000	$ 211,950	$ 21,195	11%
Volumetric Distribution Charge		69,868	$2.2994	$ 160,656	$2.9237	$ 204,275	$ 43,619	27%
Rider B - State Tax Adjustment			-0.27%	$ (1,002)	0.00%	$ -	$ 1,002	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 17,571	0.00%	$ -	$ (17,571)	-100%
Total Margin				$ 367,979		$ 416,225	$ 48,246	13%
Small Commercial < 250 MMT								
Basic Service Charge	13,282		$27.0000	$ 358,614	$30.0000	$ 398,460	$ 39,846	11%
Volumetric Distribution Charge		151,202	$2.2994	$ 347,675	$2.9237	$ 442,071	$ 94,396	27%
Rider B - State Tax Adjustment			-0.27%	$ (2,021)	0.00%	$ -	$ 2,021	-100%
DSIC - Distribution System Improvement Charge			5.00%	$ 35,314	0.00%	$ -	$ (35,314)	-100%
Total Margin				$ 739,582		$ 840,531	$ 100,949	14%
Total Margin Check				$ 739,582		$ 840,531		

National Fuel Gas Distribution Corporation
Pennsylvania Division
Small Commercial/Public Authority Current Base Rates Vs. Proposed Base Rates
Twelve Months Ended October 31, 2027

Description	Customers	Volumes (Mcf)	Current Base Rate ($/Mcf)	Current Revenue ($)	Proposed Base Rate ($/Mcf)	Proposed Revenue ($)	Change in Revenues ($)	% Change
Small Public Authority < 250 Sales								
Basic Service Charge	4,368		$27.0000	$ 117,936	$30.0000	$ 131,040	$ 13,104	11%
Volumetric Distribution Charge		132,454	$2.2994	$ 304,565	$2.9237	$ 387,257	$ 82,692	27%
Rider B - State Tax Adjustment			-0.27%	$ (1,275)	0.00%	$ -	$ 1,275	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
Rider G - Merchant Function Charge			$0.0178	$ 2,357	$0.0217	$ 2,869	$ 512	22%
Rider H - Gas Procurement Charge			$0.1149	$ 15,219	$0.1149	$ 15,219	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 22,004	0.00%	$ -	$ (22,004)	-100%
Total Margin				$ 460,806		$ 536,386	$ 75,579	16%
Small Public Authority < 250 SATC								
Basic Service Charge	276		$27.0000	$ 7,452	$30.0000	$ 8,280	$ 828	11%
Volumetric Distribution Charge		2,523	$2.2994	$ 5,801	$2.9237	$ 7,376	$ 1,575	27%
Rider B - State Tax Adjustment			-0.27%	$ (39)	0.00%	$ -	$ 39	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 663	0.00%	$ -	$ (663)	-100%
Total Margin				$ 13,877		$ 15,656	$ 1,779	13%
Small Public Authority < 250 MMT								
Basic Service Charge	2,733		$27.0000	$ 73,791	$30.0000	$ 81,990	$ 8,199	11%
Volumetric Distribution Charge		34,706	$2.2994	$ 79,802	$2.9237	$ 101,469	$ 21,667	27%
Rider B - State Tax Adjustment			-0.27%	$ (440)	0.00%	$ -	$ 440	-100%
DSIC - Distribution System Improvement Charge			5.00%	$ 7,680	0.00%	$ -	$ (7,680)	-100%
Total Margin				$ 160,833		$ 183,459	$ 22,626	14%
Small Commercial/Public Authority < 250 Total								
Basic Service Charge	125,892		$27.0000	$ 3,399,084	$30.0000	$ 3,776,760	$ 377,676	11%
Volumetric Distribution Charge		1,294,228	$2.2994	$ 2,975,947	$2.9237	$ 3,783,938	$ 807,991	27%
Rider B - State Tax Adjustment		1,294,228	-0.27%	$ (18,643)	0.00%	$ -	$ 18,643	-100%
Rider E - Customer Education		1,108,320	$0.0000	$ -	$0.0000	$ -	$ -	0%
Rider G - Merchant Function Charge		1,035,928	$0.0178	$ 18,435	$0.0217	$ 22,442	$ 4,007	22%
Rider H - Gas Procurement Charge		1,035,928	$0.1149	$ 119,028	$0.1149	$ 119,028	$ -	0%
DSIC - Distribution System Improvement Charge		1,294,228	5.00%	$ 325,625	0.00%	$ -	$ (325,625)	-100%
Total Margin				$ 6,819,476		$ 7,702,168	$ 882,692	13%
Target Revenue						**7,702,168**		

National Fuel Gas Distribution Corporation
Pennsylvania Division
Small Commercial/Public Authority Current Base Rates Vs. Proposed Base Rates
Twelve Months Ended October 31, 2027

Description	Customers	Volumes (Mcf)	Current Base Rate ($/Mcf)	Current Revenue ($)	Proposed Base Rate ($/Mcf)	Proposed Revenue ($)	Change in Revenues ($)	% Change
Small Commercial > 250 Sales								
Basic Service Charge	32,504		$37.0000	$ 1,202,648	$50.0000	$ 1,625,200	$ 422,552	35%
Volumetric Distribution Charge		1,255,860	$2.0555	$ 2,581,421	$2.2915	$ 2,877,826	$ 296,405	11%
Rider B - State Tax Adjustment			-0.27%	$ (11,274)	0.00%	$ -	$ 11,274	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
Rider G - Merchant Function Charge			$0.0178	$ 22,348	$0.0217	$ 27,206	$ 4,858	22%
Rider H - Gas Procurement Charge			$0.1149	$ 144,298	$0.1149	$ 144,298	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 197,536	0.00%	$ -	$ (197,536)	-100%
Total Margin				$ 4,136,977		$ 4,674,530	$ 537,553	13%
Small Commercial > 250 SATC								
Basic Service Charge	2,806		$37.0000	$ 103,822	$50.0000	$ 140,300	$ 36,478	35%
Volumetric Distribution Charge		110,600	$2.0555	$ 227,339	$2.2915	$ 253,443	$ 26,104	11%
Rider B - State Tax Adjustment			-0.27%	$ (945)	0.00%	$ -	$ 945	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 16,558	0.00%	$ -	$ (16,558)	-100%
Total Margin				$ 346,774		$ 393,743	$ 46,969	14%
Small Commercial > 250 MMT								
Basic Service Charge	13,953		$37.0000	$ 516,261	$50.0000	$ 697,650	$ 181,389	35%
Volumetric Distribution Charge		664,215	$2.0555	$ 1,365,294	$2.2915	$ 1,522,060	$ 156,766	11%
Rider B - State Tax Adjustment			-0.27%	$ (5,369)	0.00%	$ -	$ 5,369	-100%
DSIC - Distribution System Improvement Charge			5.00%	$ 94,078	0.00%	$ -	$ (94,078)	-100%
Total Margin				$ 1,970,263		$ 2,219,710	$ 249,447	13%
Small Public Authority > 250 Sales								
Basic Service Charge	1,186		$37.0000	$ 43,882	$50.0000	$ 59,300	$ 15,418	35%
Volumetric Distribution Charge		37,700	$2.0555	$ 77,492	$2.2915	$ 86,390	$ 8,898	11%
Rider B - State Tax Adjustment			-0.27%	$ (358)	0.00%	$ -	$ 358	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
Rider G - Merchant Function Charge			$0.0178	$ 671	$0.0217	$ 817	$ 146	22%
Rider H - Gas Procurement Charge			$0.1149	$ 4,332	$0.1149	$ 4,332	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 6,319	0.00%	$ -	$ (6,319)	-100%
Total Margin				$ 132,338		$ 150,839	$ 18,501	14%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Small Commercial/Public Authority Current Base Rates Vs. Proposed Base Rates
Twelve Months Ended October 31, 2027

Description	Customers	Volumes (Mcf)	Current Base Rate ($/Mcf)	Current Revenue ($)	Proposed Base Rate ($/Mcf)	Proposed Revenue ($)	Change in Revenues ($)	% Change
Small Public Authority > 250 SATC								
Basic Service Charge	228		$37.0000	$ 8,436	$50.0000	$ 11,400	$ 2,964	35%
Volumetric Distribution Charge		10,118	$2.0555	$ 20,798	$2.2915	$ 23,186	$ 2,388	11%
Rider B - State Tax Adjustment			-0.27%	$ (83)	0.00%	$ -	$ 83	-100%
DSIC - Distribution System Improvement Charge			5.00%	$ 1,462	0.00%	$ -	$ (1,462)	-100%
Total Margin				$ 30,612		$ 34,586	$ 3,974	13%
Small Public Authority > 250 MMT								
Basic Service Charge	2,758		$37.0000	$ 102,046	$50.0000	$ 137,900	$ 35,854	35%
Volumetric Distribution Charge		123,113	$2.0555	$ 253,059	$2.2915	$ 282,116	$ 29,057	11%
Rider B - State Tax Adjustment			-0.27%	$ (1,012)	0.00%	$ -	$ 1,012	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 17,755	0.00%	$ -	$ (17,755)	-100%
Total Margin				$ 371,849		$ 420,016	$ 48,168	13%
Small Commercial/Public Authority > 250 Total								
Basic Service Charge	53,435		$37.0000	$ 1,977,095	$50.0000	$ 2,671,750	$ 694,655	35%
Volumetric Distribution Charge		2,201,607	$2.0555	$ 4,525,403	$ 2.2915	$ 5,045,021	$ 519,618	11%
Rider B - State Tax Adjustment		2,201,607	-0.27%	$ (19,041)	0.00%	$ -	$ 19,041	-100%
Rider E - Customer Education		1,527,274	$0.0000	$ -	$0.0000	$ -	$ -	0%
Rider G - Merchant Function Charge		1,293,560	$0.0178	$ 23,019	$0.0217	$ 28,023	$ 5,004	22%
Rider H - Gas Procurement Charge		1,293,560	$0.1149	$ 148,630	$0.1149	$ 148,630	$ -	0%
DSIC - Distribution System Improvement Charge		2,201,607	5.00%	$ 333,707	0.00%	$ -	$ (333,707)	-100%
Total Margin				$ 6,988,813		$ 7,893,424	$ 904,611	13%
Target Revenue						**7,893,424**		

National Fuel Gas Distribution Corporation
Pennsylvania Division
Large Commercial/Public Authority Current Base Rates Vs. Proposed Base Rates
Twelve Months Ended October 31, 2027

Description	Customers	Volumes (Mcf)	Current		Proposed		Change in Revenues ($)	% Change
			Base Rate ($/Mcf)	Revenue ($)	Base Rate ($/Mcf)	Revenue ($)		
Large Commercial Sales								
Basic Service Charge	5,168		$151.0000	$ 780,368	$151.0000	$ 780,368	$ -	0%
Volumetric Distribution Charge		720,949	$1.6622	$ 1,198,361	$1.9763	$ 1,424,835	$ 226,474	19%
Rider B - State Tax Adjustment			-0.27%	$ (5,925)	0.00%	$ -	$ 5,925	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
Rider G - Merchant Function Charge			$0.0178	$ 12,830	$0.0217	$ 15,618	$ 2,789	22%
Rider H - Gas Procurement Charge			$0.1149	$ 82,837	$0.1149	$ 82,837	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 103,720	0.00%	$ -	$ (103,720)	-100%
Total Margin				$ 2,172,191		$ 2,303,659	$ 131,468	6%
Large Commercial SATC								
Basic Service Charge	560		$151.0000	$ 84,560	$151.0000	$ 84,560	$ -	0%
Volumetric Distribution Charge		73,045	$1.6622	$ 121,415	$1.9763	$ 144,361	$ 22,946	19%
Rider B - State Tax Adjustment			-0.27%	$ (589)	0.00%	$ -	$ 589	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 10,299	0.00%	$ -	$ (10,299)	-100%
Total Margin				$ 215,685		$ 228,921	$ 13,236	6%
Large Commercial MMT								
Basic Service Charge	8,730		$151.0000	$ 1,318,230	$151.0000	$ 1,318,230	$ -	0%
Volumetric Distribution Charge		2,644,998	$1.6622	$ 4,396,516	$1.9763	$ 5,227,398	$ 830,882	19%
Rider B - State Tax Adjustment			-0.27%	$ (16,302)	0.00%	$ -	$ 16,302	-100%
DSIC - Distribution System Improvement Charge			5.00%	$ 285,737	0.00%	$ -	$ (285,737)	-100%
Total Margin				$ 5,984,182		$ 6,545,628	$ 561,447	9%
Large Commercial DMT								
Basic Service Charge	132		$151.0000	$ 19,932	$151.0000	$ 19,932	$ -	0%
Volumetric Distribution Charge		716,683	$1.6622	$ 1,191,270	$1.9763	$ 1,416,404	$ 225,134	19%
Rider B - State Tax Adjustment			-0.27%	$ (3,480)	0.00%	$ -	$ 3,480	-100%
DSIC - Distribution System Improvement Charge			5.00%	$ 60,560	0.00%	$ -	$ (60,560)	-100%
Total Margin				$ 1,268,282		$ 1,436,336	$ 168,054	13%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Large Commercial/Public Authority Current Base Rates Vs. Proposed Base Rates
Twelve Months Ended October 31, 2027

Description	Customers	Volumes (Mcf)	Current		Proposed		Change in Revenues ($)	% Change
			Base Rate ($/Mcf)	Revenue ($)	Base Rate ($/Mcf)	Revenue ($)		
Large Public Authority Sales								
Basic Service Charge	370		$151.0000	$ 55,870	$151.0000	$ 55,870	$ -	0%
Volumetric Distribution Charge		49,118	$1.6622	$ 81,645	$1.9763	$ 97,074	$ 15,430	19%
Rider B - State Tax Adjustment			-0.27%	$ (411)	0.00%	$ -	$ 411	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
Rider G - Merchant Function Charge			$0.0178	$ 874	$0.0217	$ 1,064	$ 190	22%
Rider H - Gas Procurement Charge			$0.1149	$ 5,644	$0.1149	$ 5,644	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 7,202	0.00%	$ -	$ (7,202)	-100%
Total Margin				$ 150,823		$ 159,652	$ 8,829	6%
Large Public Authority SATC								
Basic Service Charge	36		$151.0000	$ 5,436	$151.0000	$ 5,436	$ -	0%
Volumetric Distribution Charge		3,788	$1.6622	$ 6,297	$1.9763	$ 7,487	$ 1,190	19%
Rider B - State Tax Adjustment			-0.27%	$ (34)	0.00%	$ -	$ 34	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 587	0.00%	$ -	$ (587)	-100%
Total Margin				$ 12,285		$ 12,923	$ 637	5%
Large Public Authority MMT								
Basic Service Charge	3,387		$151.0000	$ 511,437	$151.0000	$ 511,437	$ -	0%
Volumetric Distribution Charge		1,843,767	$1.6622	$ 3,064,709	$1.9763	$ 3,643,898	$ 579,189	19%
Rider B - State Tax Adjustment			-0.27%	$ (10,168)	0.00%	$ -	$ 10,168	-100%
DSIC - Distribution System Improvement Charge			5.00%	$ 178,807	0.00%	$ -	$ (178,807)	-100%
Total Margin				$ 3,744,786		$ 4,155,335	$ 410,549	11%
Large Public Authority DMT								
Basic Service Charge	36		$151.0000	$ 5,436	$151.0000	$ 5,436	$ -	0%
Volumetric Distribution Charge		203,162	$1.6622	$ 337,695	$1.9763	$ 401,515	$ 63,820	19%
Rider B - State Tax Adjustment			-0.27%	$ (980)	0.00%	$ -	$ 980	-100%
DSIC - Distribution System Improvement Charge			5.00%	$ 17,157	0.00%	$ -	$ (17,157)	-100%
Total Margin				$ 359,308		$ 406,951	$ 47,643	13%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Large Commercial/Public Authority Current Base Rates Vs. Proposed Base Rates
Twelve Months Ended October 31, 2027

Description	Customers	Volumes (Mcf)	Current Base Rate ($/Mcf)	Current Revenue ($)	Proposed Base Rate ($/Mcf)	Proposed Revenue ($)	Change in Revenues ($)	% Change
LCPA Total								
Basic Service Charge	18,419		$151.00000	$ 2,781,269	$151.0000	$ 2,781,269	$ -	0%
Volumetric Distribution Charge		6,255,510	$1.66220	$ 10,397,909	$1.9763	$ 12,362,973	$ 1,965,064	19%
Rider B - State Tax Adjustment			-0.27%	$ (37,889)	0.00%	$ -	$ 37,889	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
Rider G - Merchant Function Charge			$0.0178	$ 13,704	$0.0217	$ 16,682	$ 2,979	22%
Rider H - Gas Procurement Charge			$0.1149	$ 88,481	$0.1149	$ 88,481	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 664,068	0.00%	$ -	$ (664,068)	-100%
Total Margin				$ 13,907,541		$ 15,249,405	$ 1,341,863	10%
Target Revenue						**$ 15,249,405**		

Description	Customers	Volumes (Mcf)	Current Base Rate ($/Mcf)	Current Revenue ($)	Proposed Base Rate ($/Mcf)	Proposed Revenue ($)	Change in Revenues ($)	% Change
NGV Total								
Basic Service Charge	84		No Rate					
Volumetric Distribution Charge		70,034	$1.7896	$ 125,333	$2.1705	$ 152,008	$ 152,008	0%
Rider B - State Tax Adjustment			-0.27%	$ (355)	0.00%	$ -	$ -	0%
DSIC - Distribution System Improvement Charge			0.00%	$ 6,267	0.00%	$ -	$ 355	-100%
Total Margin				$ 131,245		$ 152,008	$ 152,363	2431%
Target Revenue						**152,008**		

National Fuel Gas Distribution Corporation
Pennsylvania Division
Industrial Current Base Rates Vs. Proposed Base Rates
Twelve Months Ended October 31, 2027

Description	Customers	Volumes (Mcf)	Current Base Rate ($/Mcf)	Current Revenue ($)	Proposed Base Rate ($/Mcf)	Proposed Revenue ($)	Change in Revenues ($)	% Change
SVIS Sales								
Basic Service Charge	1,525.0		$82.0000	$ 125,050	$82.0000	$ 125,050	$ -	0%
Volumetric Distribution Charge		60,192.3	$2.0722	$ 124,730	$2.6703	$ 160,730	$ 36,000	29%
Rider B - State Tax Adjustment			-0.27%	$ (736)	0.00%	$ -	$ 736	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
Rider G - Merchant Function Charge			$0.0178	$ 1,071	$0.0217	$ 1,304	$ 233	22%
Rider H - Gas Procurement Charge			$0.1149	$ 6,916	$0.1149	$ 6,916	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 12,888	0.00%	$ -	$ (12,888)	-100%
Total Margin				$ 269,920		$ 294,000	$ 24,080	9%
SVIS SATC								
Basic Service Charge	132.0		$82.0000	$ 10,824	$82.0000	$ 10,824	$ -	0%
Volumetric Distribution Charge		4,900.4	$2.0722	$ 10,155	$2.6703	$ 13,086	$ 2,931	29%
Rider B - State Tax Adjustment			-0.27%	$ (60)	0.00%	$ -	$ 60	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 1,049	0.00%	$ -	$ (1,049)	-100%
Total Margin				$ 21,968		$ 23,910	$ 1,942	9%
SVIS MMT								
Basic Service Charge	770.0		$82.0000	$ 63,140	$82.0000	$ 63,140	$ -	0%
Volumetric Distribution Charge		39,506.1	$2.0722	$ 81,865	$2.6703	$ 105,492	$ 23,628	29%
Rider B - State Tax Adjustment			-0.27%	$ (413)	0.00%	$ -	$ 413	-100%
DSIC - Distribution System Improvement Charge			5.00%	$ 7,250	0.00%	$ -	$ (7,250)	-100%
Total Margin				$ 151,842		$ 168,632	$ 16,791	11%
SVIS Total								
Basic Service Charge	2,427		$82.0000	$ 199,014	$82.0000	$ 199,014	$ -	0%
Volumetric Distribution Charge		104,599	$2.0722	$ 216,750	$2.6703	$ 279,308	$ 62,559	29%
Rider B - State Tax Adjustment			-0.27%	$ (1,209)	0.00%	$ -	$ 1,209	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
Rider G - Merchant Function Charge			$0.0178	$ 1,071	$0.0217	$ 1,304	$ 233	22%
Rider H - Gas Procurement Charge			$0.1149	$ 6,916	$0.1149	$ 6,916	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 21,188	0.00%	$ -	$ (21,188)	-100%
Total Margin				$ 443,729		$ 486,542	$ 42,813	10%
Target Revenue						**486,542**		

National Fuel Gas Distribution Corporation
Pennsylvania Division
Industrial Current Base Rates Vs. Proposed Base Rates
Twelve Months Ended October 31, 2027

Description	Customers	Volumes (Mcf)	Current Base Rate ($/Mcf)	Current Revenue ($)	Proposed Base Rate ($/Mcf)	Proposed Revenue ($)	Change in Revenues ($)	% Change
IVIS Sales								
Basic Service Charge	653.0		$252.0000	$ 164,556	$252.0000	$ 164,556	$ -	0%
Volumetric Distribution Charge		166,107.0	$1.3347	$ 221,703	$1.5798	$ 262,411	$ 40,708	18%
Rider B - State Tax Adjustment			-0.27%	$ (1,167)	0.00%	$ -	$ 1,167	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
Rider G - Merchant Function Charge			$0.0178	$ 2,956	$0.0217	$ 3,598	$ 643	22%
Rider H - Gas Procurement Charge			$0.1149	$ 19,086	$0.1149	$ 19,086	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 20,415	0.00%	$ -	$ (20,415)	-100%
Total Margin				$ 427,549		$ 449,651	$ 22,103	5%
IVIS SATC								
Basic Service Charge	36.0		$252.0000	$ 9,072	$252.0000	$ 9,072	$ -	0%
Volumetric Distribution Charge		5,657.8	$1.3347	$ 7,551	$1.5798	$ 8,938	$ 1,387	18%
Rider B - State Tax Adjustment			-0.27%	$ (48)	0.00%	$ -	$ 48	-100%
Rider E - Customer Education			$0.0000	$ -	$0.0000	$ -	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 831	0.00%	$ -	$ (831)	-100%
Total Margin				$ 17,407		$ 18,010	$ 603	3%
IVIS MMT								
Basic Service Charge	3,249.0		$252.0000	$ 818,748	$252.0000	$ 818,748	$ -	0%
Volumetric Distribution Charge		2,507,113.4	$1.3347	$ 3,346,244	$1.5798	$ 3,960,666	$ 614,421	18%
Rider B - State Tax Adjustment			-0.27%	$ (11,955)	0.00%	$ -	$ 11,955	-100%
DSIC - Distribution System Improvement Charge			5.00%	$ 208,250	0.00%	$ -	$ (208,250)	-100%
Total Margin				$ 4,361,287		$ 4,779,414	$ 418,127	10%
IVIS DMT								
Basic Service Charge	288.0		$252.0000	$ 72,576	$252.0000	$ 72,576	$ -	0%
Volumetric Distribution Charge		711,200.0	$1.3347	$ 949,239	$1.5798	$ 1,123,533	$ 174,295	18%
Rider B - State Tax Adjustment			-0.27%	$ (2,928)	0.00%	$ -	$ 2,928	-100%
DSIC - Distribution System Improvement Charge			5.00%	$ 51,091	0.00%	$ -	$ (51,091)	-100%
Total Margin				$ 1,069,977		$ 1,196,109	$ 126,132	12%
IVIS Total								
Basic Service Charge	4,226		$252.0000	$ 1,064,952	$252.0000	$ 1,064,952	$ -	0%
Volumetric Distribution Charge		3,390,078	$1.3347	$ 4,524,737	$1.5798	$ 5,355,548	$ 830,811	18%
Rider B - State Tax Adjustment			-0.27%	$ (16,098)	0.00%	$ -	$ 16,098	-100%
Rider E - Customer Education			0.00%	$ -	$0.0000	$ -	$ -	0%
Rider G - Merchant Function Charge			1.78%	$ 2,956	$0.0217	$ 3,598	$ 643	22%
Rider H - Gas Procurement Charge			11.49%	$ 19,086	$0.1149	$ 19,086	$ -	0%
DSIC - Distribution System Improvement Charge			5.00%	$ 280,587	0.00%	$ -	$ (280,587)	-100%
Total Margin				$ 5,876,219		$ 6,443,184	$ 566,965	10%
Target Revenue						**6,443,184**		

National Fuel Gas Distribution Corporation
Pennsylvania Division
Industrial Current Base Rates Vs. Proposed Base Rates
Twelve Months Ended October 31, 2027

Description	Customers	Volumes (Mcf)	Current		Proposed		Change in Revenues ($)	% Change
			Base Rate ($/Mcf)	Revenue ($)	Base Rate ($/Mcf)	Revenue ($)		
LVIS MMT								
Basic Service Charge	84.0		$1,023.0000	$ 85,932	$1,400.0000	$ 117,600	$ 31,668	37%
Volumetric Distribution Charge		468,000.0	$1.0243	$ 479,372	$1.1446	$ 535,661	$ 56,289	12%
Rider B - State Tax Adjustment			-0.27%	$ (1,625)	0.00%	$ -	$ 1,625	-100%
DSIC - Distribution System Improvement Charge			5.00%	$ 28,265	0.00%	$ -	$ (28,265)	-100%
Total Margin				$ 591,945		$ 653,261	$ 61,317	10%
LVIS DMT								
Basic Service Charge	228.0		$1,023.0000	$ 233,244	$1,400.0000	$ 319,200	$ 85,956	37%
Volumetric Distribution Charge		1,765,912.8	$1.0243	$ 1,808,824	$1.1446	$ 2,021,220	$ 212,395	12%
Rider B - State Tax Adjustment			-0.27%	$ (5,863)	0.00%	$ -	$ 5,863	-100%
DSIC - Distribution System Improvement Charge			5.00%	$ 102,103	0.00%	$ -	$ (102,103)	-100%
Total Margin				$ 2,138,309		$ 2,340,420	$ 202,111	9%
LVIS Total								
Basic Service Charge	312		$1,023.0000	$ 319,176	$1,400.0000	$ 436,800	$ 117,624	37%
Volumetric Distribution Charge		2,233,913	$1.0243	$ 2,288,197	$1.1446	$ 2,556,881	$ 268,684	12%
Rider B - State Tax Adjustment				$ (7,488)	0.00%	$ -	$ 7,488	-100%
DSIC - Distribution System Improvement Charge				$ 130,369	0.00%	$ -	$ (130,369)	-100%
Total Margin				$ 2,730,254		$ 2,993,681	$ 263,427	10%
Target Revenue						**2,993,681**		

National Fuel Gas Distribution Corporation
Pennsylvania Division
Industrial Current Base Rates Vs. Proposed Base Rates
Twelve Months Ended October 31, 2027

Description	Customers	Volumes (Mcf)	Current		Proposed		Change in Revenues ($)	% Change
			Base Rate ($/Mcf)	Revenue ($)	Base Rate ($/Mcf)	Revenue ($)		
LIS MMT								
Basic Service Charge	12.0		$1,165.0000	$ 13,980	$1,700.0000	$ 20,400	$ 6,420	46%
Volumetric Distribution Charge		358,268.3	$0.5993	$ 214,710	$0.6764	$ 242,316	$ 27,606	13%
Rider B - State Tax Adjustment			-0.27%	$ (658)	0.00%	$ -	$ 658	-100%
DSIC - Distribution System Improvement Charge			5.00%	$ 11,435	0.00%	$ -	$ (11,435)	-100%
Total Margin				$ 239,467		$ 262,716	$ 23,249	10%
LIS DMT								
Basic Service Charge	108.0		$1,165.0000	$ 125,820	$1,700.0000	$ 183,600	$ 57,780	46%
Volumetric Distribution Charge		3,344,982.8	$0.5993	$ 2,004,648	$0.6764	$ 2,262,389	$ 257,740	13%
Rider B - State Tax Adjustment			-0.27%	$ (6,105)	0.00%	$ -	$ 6,105	-100%
DSIC - Distribution System Improvement Charge			5.00%	$ 106,523	0.00%	$ -	$ (106,523)	-100%
Total Margin				$ 2,230,887		$ 2,445,989	$ 215,102	10%
LIS Total								
Basic Service Charge	120		$1,165.0000	$ 139,800	$1,700.0000	$ 204,000	$ 64,200	46%
Volumetric Distribution Charge		3,703,251	$0.5993	$ 2,219,358	$0.6764	$ 2,504,704	$ 285,346	13%
Rider B - State Tax Adjustment			-0.27%	$ (6,763)	0.00%	$ -	$ 6,763	-100%
DSIC - Distribution System Improvement Charge			5.00%	$ 117,958	0.00%	$ -	$ (117,958)	-100%
Total Margin				$ 2,470,353		$ 2,708,704	$ 238,351	10%
Target Revenue						**$ 2,708,704**		

National Fuel Gas Distribution Corporation
Pennsylvania Division
OPEB Rider Rate Calculation

Amount to passback **$ 6,159,000**

	(1)	(2)	(3)	(4)	(5) = (3) / (4)
Service Class	**Non-Gas Revenues**	**Settlement Allocation Factor**	**Allocation of Revenue Excess**	**Normalized Volumes (Mcf)**	**Surcredit Rate ($/Mcf)**
RESIDENTIAL	$ 72,820,648			16,570,240	
CAP	$ 2,994,065			681,296	
RESIDENTIAL SATC	$ 6,994,554			1,591,601	
	$ 82,809,267	70.9%	$ 4,365,031	18,843,137	$ 0.23165
SMALL CPA LE 250	$ 4,358,832			1,035,928	
SMALL CPA LE 250 SATC	$ 304,598			72,391	
	$ 4,663,430	1.9%	$ 118,863	1,108,320	$ 0.10725
SMALL CPA GT 250	$ 3,593,298			1,293,560	
SMALL CPA GT 250 SATC	$ 335,336			120,718	
	$ 3,928,634	3.0%	$ 185,295	1,414,279	$ 0.13102
LARGE CPA	$ 1,301,354			770,067	
LARGE CPA SATC	$ 129,842			76,833	
	$ 1,431,196	1.5%	$ 92,352	846,900	$ 0.10905
SVIS	$ 366,388			60,192	
SVIS SATC	$ 29,829			4,900	
	$ 396,217	0.1%	$ 4,380	65,093	$ 0.06729
IVIS	$ 536,187			166,107	
IVIS SATC	$ 18,263			5,658	
	$ 554,450	0.4%	$ 25,881	171,765	$ 0.15068
RESIDENTIAL TRANS	$ 256,679	0.2%	$ 13,530	115,189	$ 0.11746
SMALL CPA LE 250 TRANS	$ 593,658	0.2%	$ 15,131	185,908	$ 0.08139
SMALL CPA GT 250 TRANS	$ 1,887,513	1.4%	$ 89,025	787,328	$ 0.11307
LARGE CPA TRANS	$ 10,831,820	11.3%	$ 698,954	5,408,610	$ 0.12923
SVIS TRANS	$ 80,965	0.0%	$ 895	39,506	$ 0.02266
IVIS TRANS	$ 4,273,052	3.3%	$ 206,252	3,218,313	$ 0.06409
LVIS TRANS	$ 2,591,705	2.7%	$ 168,812	2,233,913	$ 0.07557
LIS TRANS	$ 4,275,959	2.8%	$ 174,615	3,703,251	$ 0.04715
TOTAL	$ 118,574,545	100.0%	$ 6,159,016	38,141,512	

National Fuel Gas Distribution Corporation
Pennsylvania Division
MFC Uncollectible and Rate Calculation

			Residential		Non-Residential
Total Gas Cost Revenue		$ 124,571	$ 100,820	$	23,750
Uncollectible Percentage			1.55%		1.55%
Total Gas Cost Uncollectible Revenue Requirement		$ 1,931	$ 1,563	$	368
Allocation/1			94.9%		5.1%
Uncollectible Revenue Requirement			$1,833		$98
Total Gas Cost Revenue		$ 124,571	$ 100,820	$	23,750
		1	1.8177%		0.4137%
Natural Gas Supply Charge ($/Mcf)			$ 5.0334	$	5.0334
Gas Adjustment Charge ($/Mcf)			$ 0.2036	$	0.2036
		2	$ 5.24	$	5.24
MFC Rate		1 * 2	$ 0.0952	$	0.0217

1 Allocation based upon 2024 Uncollectible Statistics Report

National Fuel Gas Distribution Corporation
Pennsylvania Division
Energy Efficiency Pilot Program Calculation

1	Proposed EE Budget (FY 2027)	$	736,726.00	(Per Statement No.18)
2	Estimated Residential Volumes		18,958,326	MCF
3	EE Rate $/Mcf	$	0.0389	

NATIONAL FUEL EXHIBIT CTM-9

BILL IMPACTS

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
Residential Sales

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	14.00	19.00	5.00	35.71%
Volumetric Distribution Charge	Per Mcf	2.9611	3.3780	0.4169	14.08%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
Rider E - Customer Education	Per Mcf	0.0000	0.0000	0.0000	0.00%
Rider G - Merchant Function Charge	Per Mcf	0.0944	0.0952	0.0008	0.80%
Rider H - Gas Procurement Charge	Per Mcf	0.1149	0.1149	0.0000	0.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider A - Distribution Charge	Per Mcf	0.4453	0.4453	0.0000	0.00%
Rider A - Natural Gas Supply Charge	Per Mcf	5.0334	5.0334	0.0000	0.00%
Rider A - Gas Adjustment Charge	Per Mcf	0.2036	0.2036	0.0000	0.00%
Rider F - CAP Discount Charge	Per Mcf	0.1223	0.1223	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.2317)	(0.2317)	-100.00%
Total Gas Cost	Per Mcf	5.8046	5.5730	(0.2317)	-3.99%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
Residential Sales

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact			
Mcf	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	January	July
0.0	14.66	19.00	4.34	30.0%	0.00	0.00	0.00	0.0%	14.66	19.00	4.34	30.0%	1,455	6,934
0.1	14.99	19.36	4.37	29.0%	0.58	0.56	(0.02)	-3.0%	15.57	19.92	4.35	28.0%	270	7,676
0.2	15.33	19.72	4.39	29.0%	1.16	1.11	(0.05)	-4.0%	16.49	20.83	4.34	26.0%	192	5,940
0.3	15.66	20.08	4.42	28.0%	1.74	1.67	(0.07)	-4.0%	17.40	21.75	4.35	25.0%	160	5,426
0.4	15.99	20.44	4.45	28.0%	2.32	2.23	(0.09)	-4.0%	18.31	22.67	4.36	24.0%	165	5,902
0.5	16.32	20.79	4.47	27.0%	2.90	2.79	(0.11)	-4.0%	19.22	23.58	4.36	23.0%	181	6,335
0.6	16.65	21.15	4.50	27.0%	3.48	3.34	(0.14)	-4.0%	20.13	24.49	4.36	22.0%	163	7,192
0.7	16.99	21.51	4.52	27.0%	4.06	3.90	(0.16)	-4.0%	21.05	25.41	4.36	21.0%	162	7,653
0.8	17.32	21.87	4.55	26.0%	4.64	4.46	(0.18)	-4.0%	21.96	26.33	4.37	20.0%	196	7,909
0.9	17.65	22.23	4.58	26.0%	5.22	5.02	(0.20)	-4.0%	22.87	27.25	4.38	19.0%	162	7,971
1.0	17.98	22.59	4.61	26.0%	5.80	5.57	(0.23)	-4.0%	23.78	28.16	4.38	18.0%	170	7,733
2.0	21.30	26.18	4.88	23.0%	11.61	11.15	(0.46)	-4.0%	32.91	37.33	4.42	13.0%	1,625	57,095
3.0	24.62	29.76	5.14	21.0%	17.41	16.72	(0.69)	-4.0%	42.03	46.48	4.45	11.0%	1,568	20,458
4.0	27.94	33.35	5.41	19.0%	23.22	22.29	(0.93)	-4.0%	51.16	55.64	4.48	9.0%	1,874	6,389
5.0	31.26	36.94	5.68	18.0%	29.02	27.86	(1.16)	-4.0%	60.28	64.80	4.52	7.0%	2,238	2,414
6.0	34.59	40.53	5.94	17.0%	34.83	33.44	(1.39)	-4.0%	69.42	73.97	4.55	7.0%	2,746	1,144
7.0	37.91	44.12	6.21	16.0%	40.63	39.01	(1.62)	-4.0%	78.54	83.13	4.59	6.0%	3,337	753
8.0	41.23	47.71	6.48	16.0%	46.44	44.58	(1.86)	-4.0%	87.67	92.29	4.62	5.0%	4,189	532
9.0	44.55	51.29	6.74	15.0%	52.24	50.16	(2.08)	-4.0%	96.79	101.45	4.66	5.0%	5,182	441
10	47.87	54.88	7.01	15.0%	58.05	55.73	(2.32)	-4.0%	105.92	110.61	4.69	4.0%	6,160	417
15	64.47	72.82	8.35	13.0%	87.07	83.59	(3.48)	-4.0%	151.54	156.41	4.87	3.0%	41,880	1,329
20	81.07	90.76	9.69	12.0%	116.09	111.46	(4.63)	-4.0%	197.16	202.22	5.06	3.0%	40,236	418
25	97.67	108.70	11.03	11.0%	145.12	139.32	(5.80)	-4.0%	242.79	248.02	5.23	2.0%	26,049	154
30	114.28	126.64	12.36	11.0%	174.14	167.19	(6.95)	-4.0%	288.42	293.83	5.41	2.0%	14,181	77
35	130.88	144.58	13.70	10.0%	203.16	195.05	(8.11)	-4.0%	334.04	339.63	5.59	2.0%	7,450	58
40	147.48	162.53	15.05	10.0%	232.18	222.92	(9.26)	-4.0%	379.66	385.45	5.79	2.0%	3,775	46
45	164.08	180.47	16.39	10.0%	261.21	250.78	(10.43)	-4.0%	425.29	431.25	5.96	1.0%	2,015	19
50	180.69	198.41	17.72	10.0%	290.23	278.65	(11.58)	-4.0%	470.92	477.06	6.14	1.0%	1,158	12
100	346.71	377.81	31.10	9.0%	580.46	557.30	(23.16)	-4.0%	927.17	935.11	7.94	1.0%	1,963	22
150	512.73	557.22	44.49	9.0%	870.69	835.94	(34.75)	-4.0%	1,383.42	1,393.16	9.74	1.0%	168	0
200	678.76	736.63	57.87	9.0%	1,160.92	1,114.59	(46.33)	-4.0%	1,839.68	1,851.22	11.54	1.0%	55	0
300	1,010.80	1,095.44	84.64	8.0%	1,741.38	1,671.89	(69.49)	-4.0%	2,752.18	2,767.33	15.15	1.0%	32	0
400	1,342.85	1,454.25	111.40	8.0%	2,321.84	2,229.18	(92.66)	-4.0%	3,664.69	3,683.43	18.74	1.0%	6	0
500	1,674.89	1,813.07	138.18	8.0%	2,902.30	2,786.48	(115.82)	-4.0%	4,577.19	4,599.55	22.36	0.0%	4	0
1,000	3,335.13	3,607.14	272.01	8.0%	5,804.60	5,572.95	(231.65)	-4.0%	9,139.73	9,180.09	40.36	0.0%	3	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
Residential Sales

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact	
Month	(Mcf)	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent
November	7	$ 37.91	$ 44.12	$ 6.21	16.0%	$ 40.63	$ 39.01	$ (1.62)	-4.0%	$ 78.54	$ 83.13	$ 4.59	6.0%
December	13	57.83	65.65	7.82	14.0%	75.46	72.45	(3.01)	-4.0%	133.29	138.10	4.81	4.0%
January	16	67.79	76.41	8.62	13.0%	92.87	89.17	(3.70)	-4.0%	160.66	165.58	4.92	3.0%
February	16	67.79	76.41	8.62	13.0%	92.87	89.17	(3.70)	-4.0%	160.66	165.58	4.92	3.0%
March	14	61.15	69.23	8.08	13.0%	81.26	78.02	(3.24)	-4.0%	142.41	147.25	4.84	3.0%
April	11	51.19	58.47	7.28	14.0%	63.85	61.30	(2.55)	-4.0%	115.04	119.77	4.73	4.0%
May	7	37.91	44.12	6.21	16.0%	40.63	39.01	(1.62)	-4.0%	78.54	83.13	4.59	6.0%
June	3	24.62	29.76	5.14	21.0%	17.41	16.72	(0.69)	-4.0%	42.03	46.48	4.45	11.0%
July	1	17.98	22.59	4.61	26.0%	5.80	5.57	(0.23)	-4.0%	23.78	28.16	4.38	18.0%
August	1	17.98	22.59	4.61	26.0%	5.80	5.57	(0.23)	-4.0%	23.78	28.16	4.38	18.0%
September	2	21.30	26.18	4.88	23.0%	11.61	11.15	(0.46)	-4.0%	32.91	37.33	4.42	13.0%
October	3	24.62	29.76	5.14	21.0%	17.41	16.72	(0.69)	-4.0%	42.03	46.48	4.45	11.0%
Total	94	$ 488.07	$ 565.29	$ 77.22	15.82%	$ 545.60	$ 523.86	$ (21.74)	-3.98%	$ 1,033.67	$ 1,089.15	$55.48	5.37%
Winter (Nov-Mar)	66	$ 292.47	$ 331.82	$ 39.35	13.45%	$ 383.09	$ 367.82	$ (15.27)	-3.99%	$ 675.56	$ 699.64	$24.08	3.56%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
Residential CAP

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	14.00	19.00	5.00	35.71%
Volumetric Distribution Charge	Per Mcf	2.9611	3.3780	0.4169	14.08%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
Rider E - Customer Education	Per Mcf	0.0000	0.0000	0.0000	0.00%
Rider G - Merchant Function Charge	Per Mcf	0.0944	0.0952	0.0008	0.80%
Rider H - Gas Procurement Charge	Per Mcf	0.1149	0.1149	0.0000	0.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider A - Distribution Charge	Per Mcf	0.4453	0.4453	0.0000	0.00%
Rider A - Natural Gas Supply Charge	Per Mcf	5.0334	5.0334	0.0000	0.00%
Rider A - Gas Adjustment Charge	Per Mcf	0.2036	0.2036	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.2317)	(0.2317)	-100.00%
Total Gas Cost	Per Mcf	5.682	5.451	(0.232)	-4.08%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
Residential CAP

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact			
Mcf	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	January	July
0.0	14.66	19.00	4.34	30.0%	0.00	0.00	0.00	0.0%	14.66	19.00	4.34	30.0%	6	164
0.1	14.99	19.36	4.37	29.0%	0.57	0.55	(0.02)	-4.0%	15.56	19.91	4.35	28.0%	1	215
0.2	15.33	19.72	4.39	29.0%	1.14	1.09	(0.05)	-4.0%	16.47	20.81	4.34	26.0%	1	182
0.3	15.66	20.08	4.42	28.0%	1.70	1.64	(0.06)	-4.0%	17.36	21.72	4.36	25.0%	2	197
0.4	15.99	20.44	4.45	28.0%	2.27	2.18	(0.09)	-4.0%	18.26	22.62	4.36	24.0%	1	196
0.5	16.32	20.79	4.47	27.0%	2.84	2.73	(0.11)	-4.0%	19.16	23.52	4.36	23.0%	2	215
0.6	16.65	21.15	4.50	27.0%	3.41	3.27	(0.14)	-4.0%	20.06	24.42	4.36	22.0%	1	259
0.7	16.99	21.51	4.52	27.0%	3.98	3.82	(0.16)	-4.0%	20.97	25.33	4.36	21.0%	4	239
0.8	17.32	21.87	4.55	26.0%	4.55	4.36	(0.19)	-4.0%	21.87	26.23	4.36	20.0%	3	275
0.9	17.65	22.23	4.58	26.0%	5.11	4.91	(0.20)	-4.0%	22.76	27.14	4.38	19.0%	3	255
1.0	17.98	22.59	4.61	26.0%	5.68	5.45	(0.23)	-4.0%	23.66	28.04	4.38	19.0%	1	258
2.0	21.30	26.18	4.88	23.0%	11.36	10.90	(0.46)	-4.0%	32.66	37.08	4.42	14.0%	30	1,825
3.0	24.62	29.76	5.14	21.0%	17.05	16.35	(0.70)	-4.0%	41.67	46.11	4.44	11.0%	43	780
4.0	27.94	33.35	5.41	19.0%	22.73	21.80	(0.93)	-4.0%	50.67	55.15	4.48	9.0%	39	270
5.0	31.26	36.94	5.68	18.0%	28.41	27.25	(1.16)	-4.0%	59.67	64.19	4.52	8.0%	62	103
6.0	34.59	40.53	5.94	17.0%	34.09	32.70	(1.39)	-4.0%	68.68	73.23	4.55	7.0%	77	28
7.0	37.91	44.12	6.21	16.0%	39.78	38.15	(1.63)	-4.0%	77.69	82.27	4.58	6.0%	92	20
8.0	41.23	47.71	6.48	16.0%	45.46	43.61	(1.85)	-4.0%	86.69	91.32	4.63	5.0%	131	18
9.0	44.55	51.29	6.74	15.0%	51.14	49.06	(2.08)	-4.0%	95.69	100.35	4.66	5.0%	167	10
10	47.87	54.88	7.01	15.0%	56.82	54.51	(2.31)	-4.0%	104.69	109.39	4.70	4.0%	190	7
15	64.47	72.82	8.35	13.0%	85.23	81.76	(3.47)	-4.0%	149.70	154.58	4.88	3.0%	1,299	49
20	81.07	90.76	9.69	12.0%	113.65	109.01	(4.64)	-4.0%	194.72	199.77	5.05	3.0%	1,386	10
25	97.67	108.70	11.03	11.0%	142.06	136.27	(5.79)	-4.0%	239.73	244.97	5.24	2.0%	986	1
30	114.28	126.64	12.36	11.0%	170.47	163.52	(6.95)	-4.0%	284.75	290.16	5.41	2.0%	611	2
35	130.88	144.58	13.70	10.0%	198.88	190.77	(8.11)	-4.0%	329.76	335.35	5.59	2.0%	376	0
40	147.48	162.53	15.05	10.0%	227.29	218.03	(9.26)	-4.0%	374.77	380.56	5.79	2.0%	173	0
45	164.08	180.47	16.39	10.0%	255.70	245.28	(10.42)	-4.0%	419.78	425.75	5.97	1.0%	92	0
50	180.69	198.41	17.72	10.0%	284.12	272.53	(11.59)	-4.0%	464.81	470.94	6.13	1.0%	40	0
100	346.71	377.81	31.10	9.0%	568.23	545.07	(23.16)	-4.0%	914.94	922.88	7.94	1.0%	83	0
150	512.73	557.22	44.49	9.0%	852.35	817.60	(34.75)	-4.0%	1,365.08	1,374.82	9.74	1.0%	3	0
200	678.76	736.63	57.87	9.0%	1,136.46	1,090.13	(46.33)	-4.0%	1,815.22	1,826.76	11.54	1.0%	2	0
300	1,010.80	1,095.44	84.64	8.0%	1,704.69	1,635.20	(69.49)	-4.0%	2,715.49	2,730.64	15.15	1.0%	1	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
Residential CAP

Annual Bill Impact															
		Delivery				Commodity				Total					
	Usage	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact	
Month	(Mcf)	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent
November	8	$ 41.23	$ 47.71	$ 6.48	16.0%	$ 45.46	$ 43.61	$ (1.85)	-4.0%	$ 86.69	$ 91.32	$ 4.63	5.0%
December	14	61.15	69.23	8.08	13.0%	79.55	76.31	(3.24)	-4.0%	140.70	145.54	4.84	3.0%
January	18	74.43	83.59	9.16	12.0%	102.28	98.11	(4.17)	-4.0%	176.71	181.70	4.99	3.0%
February	18	74.43	83.59	9.16	12.0%	102.28	98.11	(4.17)	-4.0%	176.71	181.70	4.99	3.0%
March	16	67.79	76.41	8.62	13.0%	90.92	87.21	(3.71)	-4.0%	158.71	163.62	4.91	3.0%
April	12	54.51	62.06	7.55	14.0%	68.19	65.41	(2.78)	-4.0%	122.70	127.47	4.77	4.0%
May	8	41.23	47.71	6.48	16.0%	45.46	43.61	(1.85)	-4.0%	86.69	91.32	4.63	5.0%
June	3	24.62	29.76	5.14	21.0%	17.05	16.35	(0.70)	-4.0%	41.67	46.11	4.44	11.0%
July	1	17.98	22.59	4.61	26.0%	5.68	5.45	(0.23)	-4.0%	23.66	28.04	4.38	19.0%
August	1	17.98	22.59	4.61	26.0%	5.68	5.45	(0.23)	-4.0%	23.66	28.04	4.38	19.0%
September	2	21.30	26.18	4.88	23.0%	11.36	10.90	(0.46)	-4.0%	32.66	37.08	4.42	14.0%
October	3	24.62	29.76	5.14	21.0%	17.05	16.35	(0.70)	-4.0%	41.67	46.11	4.44	11.0%
Total	104	$ 521.27	$ 601.18	$ 79.91	15.33%	$ 590.96	$ 566.87	$ (24.09)	-4.08%	$ 1,112.23	$ 1,168.05	$55.82	5.02%
Winter (Nov-Mar)	74	$ 319.03	$ 360.53	$ 41.50	13.01%	$ 420.49	$ 403.35	$ (17.14)	-4.08%	$ 739.52	$ 763.88	$24.36	3.29%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
Residential SATC

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	14.00	19.00	5.00	35.71%
Volumetric Distribution Charge	Per Mcf	2.9611	3.3780	0.4169	14.08%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
Rider E - Customer Education	Per Mcf	0.0000	0.0000	0.0000	0.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider A - Distribution Charge	Per Mcf	0.4453	0.4453	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.2317)	(0.2317)	-100.00%
Total Gas Cost	Per Mcf	0.4453	0.2137	(0.2317)	-52.02%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
Residential SATC

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact			
Mcf	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	January	July
0.0	14.66	19.00	4.34	30.0%	0.00	0.00	0.00	0.0%	14.66	19.00	4.34	30.0%	57	583
0.1	14.97	19.34	4.37	29.0%	0.04	0.02	(0.02)	-50.0%	15.01	19.36	4.35	29.0%	16	773
0.2	15.28	19.68	4.40	29.0%	0.09	0.04	(0.05)	-56.0%	15.37	19.72	4.35	28.0%	9	629
0.3	15.59	20.01	4.42	28.0%	0.13	0.06	(0.07)	-54.0%	15.72	20.07	4.35	28.0%	17	580
0.4	15.90	20.35	4.45	28.0%	0.18	0.09	(0.09)	-50.0%	16.08	20.44	4.36	27.0%	10	601
0.5	16.21	20.69	4.48	28.0%	0.22	0.11	(0.11)	-50.0%	16.43	20.80	4.37	27.0%	15	704
0.6	16.52	21.03	4.51	27.0%	0.27	0.13	(0.14)	-52.0%	16.79	21.16	4.37	26.0%	14	825
0.7	16.83	21.36	4.53	27.0%	0.31	0.15	(0.16)	-52.0%	17.14	21.51	4.37	25.0%	7	904
0.8	17.14	21.70	4.56	27.0%	0.36	0.17	(0.19)	-53.0%	17.50	21.87	4.37	25.0%	6	925
0.9	17.45	22.04	4.59	26.0%	0.40	0.19	(0.21)	-53.0%	17.85	22.23	4.38	25.0%	17	899
1.0	17.76	22.38	4.62	26.0%	0.45	0.21	(0.24)	-53.0%	18.21	22.59	4.38	24.0%	9	883
2.0	20.86	25.76	4.90	23.0%	0.89	0.43	(0.46)	-52.0%	21.75	26.19	4.44	20.0%	103	6,281
3.0	23.97	29.13	5.16	22.0%	1.34	0.64	(0.70)	-52.0%	25.31	29.77	4.46	18.0%	141	2,171
4.0	27.07	32.51	5.44	20.0%	1.78	0.85	(0.93)	-52.0%	28.85	33.36	4.51	16.0%	154	670
5.0	30.17	35.89	5.72	19.0%	2.23	1.07	(1.16)	-52.0%	32.40	36.96	4.56	14.0%	188	253
6.0	33.27	39.27	6.00	18.0%	2.67	1.28	(1.39)	-52.0%	35.94	40.55	4.61	13.0%	243	125
7.0	36.37	42.65	6.28	17.0%	3.12	1.50	(1.62)	-52.0%	39.49	44.15	4.66	12.0%	307	83
8.0	39.47	46.02	6.55	17.0%	3.56	1.71	(1.85)	-52.0%	43.03	47.73	4.70	11.0%	417	40
9.0	42.57	49.40	6.83	16.0%	4.01	1.92	(2.09)	-52.0%	46.58	51.32	4.74	10.0%	519	45
10	45.67	52.78	7.11	16.0%	4.45	2.14	(2.31)	-52.0%	50.12	54.92	4.80	10.0%	695	55
15	61.18	69.67	8.49	14.0%	6.68	3.20	(3.48)	-52.0%	67.86	72.87	5.01	7.0%	4,571	148
20	76.69	86.56	9.87	13.0%	8.91	4.27	(4.64)	-52.0%	85.60	90.83	5.23	6.0%	4,410	33
25	92.19	103.45	11.26	12.0%	11.13	5.34	(5.79)	-52.0%	103.32	108.79	5.47	5.0%	2,724	14
30	107.70	120.34	12.64	12.0%	13.36	6.41	(6.95)	-52.0%	121.06	126.75	5.69	5.0%	1,513	8
35	123.21	137.23	14.02	11.0%	15.59	7.48	(8.11)	-52.0%	138.80	144.71	5.91	4.0%	666	4
40	138.71	154.12	15.41	11.0%	17.81	8.55	(9.26)	-52.0%	156.52	162.67	6.15	4.0%	426	4
45	154.22	171.01	16.79	11.0%	20.04	9.61	(10.43)	-52.0%	174.26	180.62	6.36	4.0%	222	2
50	169.72	187.90	18.18	11.0%	22.27	10.68	(11.59)	-52.0%	191.99	198.58	6.59	3.0%	120	1
100	324.78	356.80	32.02	10.0%	44.53	21.37	(23.16)	-52.0%	369.31	378.17	8.86	2.0%	189	1
150	479.85	525.71	45.86	10.0%	66.80	32.05	(34.75)	-52.0%	546.65	557.76	11.11	2.0%	23	0
200	634.91	694.61	59.70	9.0%	89.06	42.73	(46.33)	-52.0%	723.97	737.34	13.37	2.0%	7	0
300	945.03	1,032.41	87.38	9.0%	133.59	64.10	(69.49)	-52.0%	1,078.62	1,096.51	17.89	2.0%	4	0
400	1,255.15	1,370.22	115.07	9.0%	178.12	85.46	(92.66)	-52.0%	1,433.27	1,455.68	22.41	2.0%	1	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
Residential SATC

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact	
Month	(Mcf)	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent
November	7	$ 36.37	$ 42.65	$ 6.28	17.0%	$ 3.12	$ 1.50	$ (1.62)	-52.0%	$ 39.49	$ 44.15	$ 4.66	12.0%
December	13	54.98	62.91	7.93	14.0%	5.79	2.78	(3.01)	-52.0%	60.77	65.69	4.92	8.0%
January	17	67.38	76.43	9.05	13.0%	7.57	3.63	(3.94)	-52.0%	74.95	80.06	5.11	7.0%
February	17	67.38	76.43	9.05	13.0%	7.57	3.63	(3.94)	-52.0%	74.95	80.06	5.11	7.0%
March	15	61.18	69.67	8.49	14.0%	6.68	3.20	(3.48)	-52.0%	67.86	72.87	5.01	7.0%
April	11	48.78	56.16	7.38	15.0%	4.90	2.35	(2.55)	-52.0%	53.68	58.51	4.83	9.0%
May	7	36.37	42.65	6.28	17.0%	3.12	1.50	(1.62)	-52.0%	39.49	44.15	4.66	12.0%
June	3	23.97	29.13	5.16	22.0%	1.34	0.64	(0.70)	-52.0%	25.31	29.77	4.46	18.0%
July	1	17.76	22.38	4.62	26.0%	0.45	0.21	(0.24)	-53.0%	18.21	22.59	4.38	24.0%
August	1	17.76	22.38	4.62	26.0%	0.45	0.21	(0.24)	-53.0%	18.21	22.59	4.38	24.0%
September	2	20.86	25.76	4.90	23.0%	0.89	0.43	(0.46)	-52.0%	21.75	26.19	4.44	20.0%
October	3	23.97	29.13	5.16	22.0%	1.34	0.64	(0.70)	-52.0%	25.31	29.77	4.46	18.0%
Total	97	$ 476.76	$ 555.68	$ 78.92	16.55%	$ 43.22	$ 20.72	$ (22.50)	-52.06%	$ 519.98	$ 576.40	$56.42	10.85%
Winter (Nov-Mar)	69	$ 287.29	$ 328.09	$ 40.80	14.20%	$ 30.73	$ 14.74	$ (15.99)	-52.03%	$ 318.02	$ 342.83	$24.81	7.80%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
Residential MMT

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	14.00	19.00	5.00	35.71%
Volumetric Distribution Charge	Per Mcf	2.9611	3.3780	0.4169	14.08%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
MMT Gas Cost Charge	Per Mcf	0.4900	0.4900	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.1175)	(0.1175)	-100.00%
Total Gas Cost	Per Mcf	0.4900	0.3725	(0.1175)	76.03%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
Residential MMT

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact			
Mcf	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	January	July
0.0	14.00	19.00	5.00	36.0%	0.00	0.00	0.00	0.0%	14.00	19.00	5.00	36.0%	0	17
0.1	14.31	19.34	5.03	35.0%	0.05	0.04	(0.01)	-20.0%	14.36	19.38	5.02	35.0%	2	52
0.2	14.62	19.68	5.06	35.0%	0.10	0.07	(0.03)	-30.0%	14.72	19.75	5.03	34.0%	0	23
0.3	14.93	20.01	5.08	34.0%	0.15	0.11	(0.04)	-27.0%	15.08	20.12	5.04	33.0%	0	21
0.4	15.24	20.35	5.11	34.0%	0.20	0.15	(0.05)	-25.0%	15.44	20.50	5.06	33.0%	1	20
0.5	15.55	20.69	5.14	33.0%	0.25	0.19	(0.06)	-24.0%	15.80	20.88	5.08	32.0%	1	26
0.6	15.86	21.03	5.17	33.0%	0.29	0.22	(0.07)	-24.0%	16.15	21.25	5.10	32.0%	2	21
0.7	16.17	21.36	5.19	32.0%	0.34	0.26	(0.08)	-24.0%	16.51	21.62	5.11	31.0%	1	28
0.8	16.48	21.70	5.22	32.0%	0.39	0.30	(0.09)	-23.0%	16.87	22.00	5.13	30.0%	0	28
0.9	16.79	22.04	5.25	31.0%	0.44	0.34	(0.10)	-23.0%	17.23	22.38	5.15	30.0%	0	13
1.0	17.10	22.38	5.28	31.0%	0.49	0.37	(0.12)	-24.0%	17.59	22.75	5.16	29.0%	3	18
2.0	20.20	25.76	5.56	28.0%	0.98	0.75	(0.23)	-23.0%	21.18	26.51	5.33	25.0%	19	94
3.0	23.30	29.13	5.83	25.0%	1.47	1.12	(0.35)	-24.0%	24.77	30.25	5.48	22.0%	16	39
4.0	26.40	32.51	6.11	23.0%	1.96	1.49	(0.47)	-24.0%	28.36	34.00	5.64	20.0%	17	25
5.0	29.51	35.89	6.38	22.0%	2.45	1.86	(0.59)	-24.0%	31.96	37.75	5.79	18.0%	26	21
6.0	32.61	39.27	6.66	20.0%	2.94	2.24	(0.70)	-24.0%	35.55	41.51	5.96	17.0%	26	11
7.0	35.71	42.65	6.94	19.0%	3.43	2.61	(0.82)	-24.0%	39.14	45.26	6.12	16.0%	24	9
8.0	38.81	46.02	7.21	19.0%	3.92	2.98	(0.94)	-24.0%	42.73	49.00	6.27	15.0%	19	6
9.0	41.91	49.40	7.49	18.0%	4.41	3.35	(1.06)	-24.0%	46.32	52.75	6.43	14.0%	14	3
10.0	45.01	52.78	7.77	17.0%	4.90	3.73	(1.17)	-24.0%	49.91	56.51	6.60	13.0%	11	4
15.0	60.52	69.67	9.15	15.0%	7.35	5.59	(1.76)	-24.0%	67.87	75.26	7.39	11.0%	61	10
20.0	76.02	86.56	10.54	14.0%	9.80	7.45	(2.35)	-24.0%	85.82	94.01	8.19	10.0%	39	4
25.0	91.53	103.45	11.92	13.0%	12.25	9.31	(2.94)	-24.0%	103.78	112.76	8.98	9.0%	41	3
30.0	107.04	120.34	13.30	12.0%	14.70	11.18	(3.52)	-24.0%	121.74	131.52	9.78	8.0%	29	2
35.0	122.54	137.23	14.69	12.0%	17.15	13.04	(4.11)	-24.0%	139.69	150.27	10.58	8.0%	19	0
40	138.05	154.12	16.07	12.0%	19.60	14.90	(4.70)	-24.0%	157.65	169.02	11.37	7.0%	16	0
45	153.56	171.01	17.45	11.0%	22.05	16.76	(5.29)	-24.0%	175.61	187.77	12.16	7.0%	8	0
50	169.06	187.90	18.84	11.0%	24.50	18.63	(5.87)	-24.0%	193.56	206.53	12.97	7.0%	3	0
100	324.12	356.80	32.68	10.0%	49.00	37.25	(11.75)	-24.0%	373.12	394.05	20.93	6.0%	36	2
150	479.18	525.71	46.53	10.0%	73.50	55.88	(17.62)	-24.0%	552.68	581.59	28.91	5.0%	21	0
200	634.24	694.61	60.37	10.0%	98.00	74.51	(23.49)	-24.0%	732.24	769.12	36.88	5.0%	11	0
300	944.37	1,032.41	88.04	9.0%	147.00	111.76	(35.24)	-24.0%	1,091.37	1,144.17	52.80	5.0%	10	0
400	1,254.49	1,370.22	115.73	9.0%	196.00	149.02	(46.98)	-24.0%	1,450.49	1,519.24	68.75	5.0%	8	0
500	1,564.61	1,708.02	143.41	9.0%	245.00	186.27	(58.73)	-24.0%	1,809.61	1,894.29	84.68	5.0%	6	0
1,000	3,115.22	3,397.04	281.82	9.0%	490.00	372.54	(117.46)	-24.0%	3,605.22	3,769.58	164.36	5.0%	1	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
Residential MMT

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact	
Month	(Mcf)	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent
November	17	$ 66.72	$ 76.43	$ 9.71	15.0%	$ 8.33	$ 6.33	$ (2.00)	-24.0%	$ 75.05	$ 82.76	$ 7.71	10.0%
December	32	113.24	127.10	13.86	12.0%	15.68	11.92	(3.76)	-24.0%	128.92	139.02	10.10	8.0%
January	44	150.45	167.63	17.18	11.0%	21.56	16.39	(5.17)	-24.0%	172.01	184.02	12.01	7.0%
February	46	156.66	174.39	17.73	11.0%	22.54	17.14	(5.40)	-24.0%	179.20	191.53	12.33	7.0%
March	40	138.05	154.12	16.07	12.0%	19.60	14.90	(4.70)	-24.0%	157.65	169.02	11.37	7.0%
April	30	107.04	120.34	13.30	12.0%	14.70	11.18	(3.52)	-24.0%	121.74	131.52	9.78	8.0%
May	18	69.82	79.80	9.98	14.0%	8.82	6.71	(2.11)	-24.0%	78.64	86.51	7.87	10.0%
June	7	35.71	42.65	6.94	19.0%	3.43	2.61	(0.82)	-24.0%	39.14	45.26	6.12	16.0%
July	2	20.20	25.76	5.56	28.0%	0.98	0.75	(0.23)	-23.0%	21.18	26.51	5.33	25.0%
August	2	20.20	25.76	5.56	28.0%	0.98	0.75	(0.23)	-23.0%	21.18	26.51	5.33	25.0%
September	3	23.30	29.13	5.83	25.0%	1.47	1.12	(0.35)	-24.0%	24.77	30.25	5.48	22.0%
October	6	32.61	39.27	6.66	20.0%	2.94	2.24	(0.70)	-24.0%	35.55	41.51	5.96	17.0%
Total	247	$ 934.00	$ 1,062.38	$ 128.38	13.75%	$ 121.03	$ 92.04	$ (28.99)	-23.95%	$ 1,055.03	$ 1,154.42	$99.39	9.42%
Winter (Nov-Mar)	179	$ 625.12	$ 699.67	$ 74.55	11.93%	$ 87.71	$ 66.68	$ (21.03)	-23.98%	$ 712.83	$ 766.35	$53.52	7.51%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA < 250 Sales

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	27.00	30.00	3.00	11.11%
Volumetric Distribution Charge	Per Mcf	2.2994	2.9237	0.6243	27.15%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
Rider E - Customer Education	Per Mcf	0.0000	0.0000	0.0000	0.00%
Rider G - Merchant Function Charge	Per Mcf	0.0178	0.0217	0.0039	21.74%
Rider H - Gas Procurement Charge	Per Mcf	0.1149	0.1149	0.0000	0.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider A - Distribution Charge	Per Mcf	0.4453	0.4453	0.0000	0.00%
Rider A - Natural Gas Supply Charge	Per Mcf	5.0334	5.0334	0.0000	0.00%
Rider A - Gas Adjustment Charge	Per Mcf	0.2036	0.2036	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.1073)	(0.1073)	-100.00%
Total Gas Cost	Per Mcf	5.6823	5.5751	(0.1073)	-1.89%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA < 250 Sales

	Monthly Bill Impact													
	Delivery				Commodity				Total					
	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Number of Cycle Bills	
Mcf	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	January	July
0.0	28.28	30.00	1.72	6.0%	0.00	0.00	0.00	0.0%	28.28	30.00	1.72	6.0%	319	1,898
0.1	28.53	30.31	1.78	6.0%	0.57	0.56	(0.01)	-2.0%	29.10	30.87	1.77	6.0%	70	1,329
0.2	28.79	30.61	1.82	6.0%	1.14	1.12	(0.02)	-2.0%	29.93	31.73	1.80	6.0%	53	600
0.3	29.04	30.92	1.88	6.0%	1.70	1.67	(0.03)	-2.0%	30.74	32.59	1.85	6.0%	32	460
0.4	29.30	31.22	1.92	7.0%	2.27	2.23	(0.04)	-2.0%	31.57	33.45	1.88	6.0%	30	514
0.5	29.55	31.53	1.98	7.0%	2.84	2.79	(0.05)	-2.0%	32.39	34.32	1.93	6.0%	24	409
0.6	29.81	31.84	2.03	7.0%	3.41	3.35	(0.06)	-2.0%	33.22	35.19	1.97	6.0%	36	343
0.7	30.06	32.14	2.08	7.0%	3.98	3.90	(0.08)	-2.0%	34.04	36.04	2.00	6.0%	22	314
0.8	30.32	32.45	2.13	7.0%	4.55	4.46	(0.09)	-2.0%	34.87	36.91	2.04	6.0%	27	249
0.9	30.57	32.75	2.18	7.0%	5.11	5.02	(0.09)	-2.0%	35.68	37.77	2.09	6.0%	20	200
1.0	30.82	33.06	2.24	7.0%	5.68	5.58	(0.10)	-2.0%	36.50	38.64	2.14	6.0%	27	182
2.0	33.37	36.12	2.75	8.0%	11.36	11.15	(0.21)	-2.0%	44.73	47.27	2.54	6.0%	192	1,053
3.0	35.92	39.18	3.26	9.0%	17.05	16.73	(0.32)	-2.0%	52.97	55.91	2.94	6.0%	168	318
4.0	38.47	42.24	3.77	10.0%	22.73	22.30	(0.43)	-2.0%	61.20	64.54	3.34	5.0%	153	145
5.0	41.01	45.30	4.29	10.0%	28.41	27.88	(0.53)	-2.0%	69.42	73.18	3.76	5.0%	185	91
6.0	43.56	48.36	4.80	11.0%	34.09	33.45	(0.64)	-2.0%	77.65	81.81	4.16	5.0%	173	69
7.0	46.11	51.42	5.31	12.0%	39.78	39.03	(0.75)	-2.0%	85.89	90.45	4.56	5.0%	197	45
8.0	48.66	54.48	5.82	12.0%	45.46	44.60	(0.86)	-2.0%	94.12	99.08	4.96	5.0%	198	31
9.0	51.20	57.54	6.34	12.0%	51.14	50.18	(0.96)	-2.0%	102.34	107.72	5.38	5.0%	221	29
10	53.75	60.60	6.85	13.0%	56.82	55.75	(1.07)	-2.0%	110.57	116.35	5.78	5.0%	247	38
15	66.49	75.90	9.41	14.0%	85.23	83.63	(1.60)	-2.0%	151.72	159.53	7.81	5.0%	1,110	82
20	79.22	91.21	11.99	15.0%	113.65	111.50	(2.15)	-2.0%	192.87	202.71	9.84	5.0%	1,095	29
25	91.96	106.51	14.55	16.0%	142.06	139.38	(2.68)	-2.0%	234.02	245.89	11.87	5.0%	885	19
30	104.69	121.81	17.12	16.0%	170.47	167.25	(3.22)	-2.0%	275.16	289.06	13.90	5.0%	685	12
35	117.43	137.11	19.68	17.0%	198.88	195.13	(3.75)	-2.0%	316.31	332.24	15.93	5.0%	581	4
40	130.17	152.41	22.24	17.0%	227.29	223.00	(4.29)	-2.0%	357.46	375.41	17.95	5.0%	449	2
45	142.90	167.71	24.81	17.0%	255.70	250.88	(4.82)	-2.0%	398.60	418.59	19.99	5.0%	327	1
50	155.64	183.01	27.37	18.0%	284.12	278.75	(5.37)	-2.0%	439.76	461.76	22.00	5.0%	255	1
100	283.00	336.03	53.03	19.0%	568.23	557.51	(10.72)	-2.0%	851.23	893.54	42.31	5.0%	620	1
150	410.36	489.04	78.68	19.0%	852.35	836.26	(16.09)	-2.0%	1,262.71	1,325.30	62.59	5.0%	42	1
200	537.71	642.05	104.34	19.0%	1,136.46	1,115.01	(21.45)	-2.0%	1,674.17	1,757.06	82.89	5.0%	5	0
300	792.43	948.08	155.65	20.0%	1,704.69	1,672.52	(32.17)	-2.0%	2,497.12	2,620.60	123.48	5.0%	7	2
400	1,047.15	1,254.11	206.96	20.0%	2,272.92	2,230.02	(42.90)	-2.0%	3,320.07	3,484.13	164.06	5.0%	2	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA < 250 Sales

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact	
Month	(Mcf)	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent
November	9	$ 51.20	$ 57.54	$ 6.34	12.0%	$ 51.14	$ 50.18	$ (0.96)	-2.0%	$ 102.34	$ 107.72	$ 5.38	5.0%
December	17	71.58	82.02	10.44	15.0%	96.60	94.78	(1.82)	-2.0%	168.18	176.80	8.62	5.0%
January	21	81.77	94.27	12.50	15.0%	119.33	117.08	(2.25)	-2.0%	201.10	211.35	10.25	5.0%
February	21	81.77	94.27	12.50	15.0%	119.33	117.08	(2.25)	-2.0%	201.10	211.35	10.25	5.0%
March	18	74.13	85.08	10.95	15.0%	102.28	100.35	(1.93)	-2.0%	176.41	185.43	9.02	5.0%
April	14	63.94	72.84	8.90	14.0%	79.55	78.05	(1.50)	-2.0%	143.49	150.89	7.40	5.0%
May	9	51.20	57.54	6.34	12.0%	51.14	50.18	(0.96)	-2.0%	102.34	107.72	5.38	5.0%
June	3	35.92	39.18	3.26	9.0%	17.05	16.73	(0.32)	-2.0%	52.97	55.91	2.94	6.0%
July	2	33.37	36.12	2.75	8.0%	11.36	11.15	(0.21)	-2.0%	44.73	47.27	2.54	6.0%
August	2	33.37	36.12	2.75	8.0%	11.36	11.15	(0.21)	-2.0%	44.73	47.27	2.54	6.0%
September	2	33.37	36.12	2.75	8.0%	11.36	11.15	(0.21)	-2.0%	44.73	47.27	2.54	6.0%
October	4	38.47	42.24	3.77	10.0%	22.73	22.30	(0.43)	-2.0%	61.20	64.54	3.34	5.0%
Total	122	$ 650.09	$ 733.34	$ 83.25	12.81%	$ 693.23	$ 680.18	$ (13.05)	-1.88%	$ 1,343.32	$ 1,413.52	$70.20	5.23%
Winter (Nov-Mar)	86	$ 360.45	$ 413.18	$ 52.73	14.63%	$ 488.68	$ 479.47	$ (9.21)	-1.88%	$ 849.13	$ 892.65	$43.52	5.13%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA < 250 SATC

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	27.00	30.00	3.00	11.11%
Volumetric Distribution Charge	Per Mcf	2.2994	2.9237	0.6243	27.15%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
Rider E - Customer Education	Per Mcf	0.0000	0.0000	0.0000	0.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider A - Distribution Charge	Per Mcf	0.4453	0.4453	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.1073)	(0.1073)	-100.00%
Total Gas Cost	Per Mcf	0.4453	0.3381	(0.1073)	-24.08%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA < 250 SATC

	Monthly Bill Impact													
	Delivery				Commodity				Total					
	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Number of Cycle Bills	
Mcf	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	January	July
0.0	28.28	30.00	1.72	6.0%	0.00	0.00	0.00	0.0%	28.28	30.00	1.72	6.0%	7	103
0.1	28.52	30.29	1.77	6.0%	0.04	0.03	(0.01)	-25.0%	28.56	30.32	1.76	6.0%	3	105
0.2	28.76	30.58	1.82	6.0%	0.09	0.07	(0.02)	-22.0%	28.85	30.65	1.80	6.0%	3	41
0.3	29.00	30.88	1.88	6.0%	0.13	0.10	(0.03)	-23.0%	29.13	30.98	1.85	6.0%	0	36
0.4	29.24	31.17	1.93	7.0%	0.18	0.14	(0.04)	-22.0%	29.42	31.31	1.89	6.0%	1	42
0.5	29.48	31.46	1.98	7.0%	0.22	0.17	(0.05)	-23.0%	29.70	31.63	1.93	6.0%	0	41
0.6	29.72	31.75	2.03	7.0%	0.27	0.20	(0.07)	-26.0%	29.99	31.95	1.96	7.0%	1	24
0.7	29.96	32.05	2.09	7.0%	0.31	0.24	(0.07)	-23.0%	30.27	32.29	2.02	7.0%	1	34
0.8	30.20	32.34	2.14	7.0%	0.36	0.27	(0.09)	-25.0%	30.56	32.61	2.05	7.0%	1	21
0.9	30.45	32.63	2.18	7.0%	0.40	0.30	(0.10)	-25.0%	30.85	32.93	2.08	7.0%	2	19
1.0	30.69	32.92	2.23	7.0%	0.45	0.34	(0.11)	-24.0%	31.14	33.26	2.12	7.0%	3	15
2.0	33.09	35.85	2.76	8.0%	0.89	0.68	(0.21)	-24.0%	33.98	36.53	2.55	8.0%	9	114
3.0	35.50	38.77	3.27	9.0%	1.34	1.01	(0.33)	-25.0%	36.84	39.78	2.94	8.0%	11	36
4.0	37.91	41.69	3.78	10.0%	1.78	1.35	(0.43)	-24.0%	39.69	43.04	3.35	8.0%	15	17
5.0	40.32	44.62	4.30	11.0%	2.23	1.69	(0.54)	-24.0%	42.55	46.31	3.76	9.0%	17	10
6.0	42.73	47.54	4.81	11.0%	2.67	2.03	(0.64)	-24.0%	45.40	49.57	4.17	9.0%	17	7
7.0	45.14	50.47	5.33	12.0%	3.12	2.37	(0.75)	-24.0%	48.26	52.84	4.58	9.0%	13	8
8.0	47.54	53.39	5.85	12.0%	3.56	2.70	(0.86)	-24.0%	51.10	56.09	4.99	10.0%	27	4
9.0	49.95	56.31	6.36	13.0%	4.01	3.04	(0.97)	-24.0%	53.96	59.35	5.39	10.0%	20	2
10	52.36	59.24	6.88	13.0%	4.45	3.38	(1.07)	-24.0%	56.81	62.62	5.81	10.0%	21	3
15	64.40	73.86	9.46	15.0%	6.68	5.07	(1.61)	-24.0%	71.08	78.93	7.85	11.0%	98	5
20	76.44	88.47	12.03	16.0%	8.91	6.76	(2.15)	-24.0%	85.35	95.23	9.88	12.0%	93	4
25	88.48	103.09	14.61	17.0%	11.13	8.45	(2.68)	-24.0%	99.61	111.54	11.93	12.0%	92	1
30	100.52	117.71	17.19	17.0%	13.36	10.14	(3.22)	-24.0%	113.88	127.85	13.97	12.0%	61	0
35	112.57	132.33	19.76	18.0%	15.59	11.83	(3.76)	-24.0%	128.16	144.16	16.00	12.0%	63	0
40	124.61	146.95	22.34	18.0%	17.81	13.52	(4.29)	-24.0%	142.42	160.47	18.05	13.0%	38	0
45	136.65	161.57	24.92	18.0%	20.04	15.21	(4.83)	-24.0%	156.69	176.78	20.09	13.0%	42	0
50	148.69	176.19	27.50	18.0%	22.27	16.90	(5.37)	-24.0%	170.96	193.09	22.13	13.0%	34	0
100	269.10	322.37	53.27	20.0%	44.53	33.81	(10.72)	-24.0%	313.63	356.18	42.55	14.0%	60	0
150	389.51	468.56	79.05	20.0%	66.80	50.71	(16.09)	-24.0%	456.31	519.27	62.96	14.0%	5	0
200	509.92	614.74	104.82	21.0%	89.06	67.61	(21.45)	-24.0%	598.98	682.35	83.37	14.0%	0	0
300	750.74	907.11	156.37	21.0%	133.59	101.42	(32.17)	-24.0%	884.33	1,008.53	124.20	14.0%	0	0
400	991.56	1,199.48	207.92	21.0%	178.12	135.22	(42.90)	-24.0%	1,169.68	1,334.70	165.02	14.0%	0	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA < 250 SATC

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact	
Month	(Mcf)	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent
November	9	$ 49.95	$ 56.31	$ 6.36	13.0%	$ 4.01	$ 3.04	$ (0.97)	-24.0%	$ 53.96	$ 59.35	$ 5.39	10.0%
December	17	69.22	79.70	10.48	15.0%	7.57	5.75	(1.82)	-24.0%	76.79	85.45	8.66	11.0%
January	21	78.85	91.40	12.55	16.0%	9.35	7.10	(2.25)	-24.0%	88.20	98.50	10.30	12.0%
February	21	78.85	91.40	12.55	16.0%	9.35	7.10	(2.25)	-24.0%	88.20	98.50	10.30	12.0%
March	18	71.63	82.63	11.00	15.0%	8.02	6.08	(1.94)	-24.0%	79.65	88.71	9.06	11.0%
April	14	61.99	70.93	8.94	14.0%	6.23	4.73	(1.50)	-24.0%	68.22	75.66	7.44	11.0%
May	8	47.54	53.39	5.85	12.0%	3.56	2.70	(0.86)	-24.0%	51.10	56.09	4.99	10.0%
June	3	35.50	38.77	3.27	9.0%	1.34	1.01	(0.33)	-25.0%	36.84	39.78	2.94	8.0%
July	1	30.69	32.92	2.23	7.0%	0.45	0.34	(0.11)	-24.0%	31.14	33.26	2.12	7.0%
August	1	30.69	32.92	2.23	7.0%	0.45	0.34	(0.11)	-24.0%	31.14	33.26	2.12	7.0%
September	1	30.69	32.92	2.23	7.0%	0.45	0.34	(0.11)	-24.0%	31.14	33.26	2.12	7.0%
October	3	35.50	38.77	3.27	9.0%	1.34	1.01	(0.33)	-25.0%	36.84	39.78	2.94	8.0%
Total	117	$ 621.10	$ 702.06	$ 80.96	13.03%	$ 52.12	$ 39.54	$ (12.58)	-24.14%	$ 673.22	$ 741.60	$68.38	10.16%
Winter (Nov-Mar)	86	$ 348.50	$ 401.44	$ 52.94	15.19%	$ 38.30	$ 29.07	$ (9.23)	-24.10%	$ 386.80	$ 430.51	$43.71	11.30%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA < 250 MMT

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	27.00	30.00	3.00	11.11%
Volumetric Distribution Charge	Per Mcf	2.2994	2.9237	0.6243	27.15%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
MMT Gas Cost Charge	Per Mcf	0.4900	0.4900	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.0814)	(0.0814)	-100.00%
Total Gas Cost	Per Mcf	0.4900	0.4086	(0.0814)	-16.61%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA < 250 MMT

	Monthly Bill Impact													
	Delivery				Commodity				Total					
	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Number of Cycle Bills	
Mcf	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	January	July
0.0	27.00	30.00	3.00	11.0%	0.00	0.00	0.00	0.0%	27.00	30.00	3.00	11.0%	33	228
0.1	27.24	30.29	3.05	11.0%	0.05	0.04	(0.01)	-20.0%	27.29	30.33	3.04	11.0%	6	194
0.2	27.48	30.58	3.10	11.0%	0.10	0.08	(0.02)	-20.0%	27.58	30.66	3.08	11.0%	7	84
0.3	27.72	30.88	3.16	11.0%	0.15	0.12	(0.03)	-20.0%	27.87	31.00	3.13	11.0%	6	62
0.4	27.96	31.17	3.21	11.0%	0.20	0.16	(0.04)	-20.0%	28.16	31.33	3.17	11.0%	3	57
0.5	28.20	31.46	3.26	12.0%	0.25	0.20	(0.05)	-20.0%	28.45	31.66	3.21	11.0%	4	58
0.6	28.44	31.75	3.31	12.0%	0.29	0.25	(0.04)	-14.0%	28.73	32.00	3.27	11.0%	5	42
0.7	28.69	32.05	3.36	12.0%	0.34	0.29	(0.05)	-15.0%	29.03	32.34	3.31	11.0%	3	31
0.8	28.93	32.34	3.41	12.0%	0.39	0.33	(0.06)	-15.0%	29.32	32.67	3.35	11.0%	5	26
0.9	29.17	32.63	3.46	12.0%	0.44	0.37	(0.07)	-16.0%	29.61	33.00	3.39	11.0%	5	35
1.0	29.41	32.92	3.51	12.0%	0.49	0.41	(0.08)	-16.0%	29.90	33.33	3.43	11.0%	0	33
2.0	31.82	35.85	4.03	13.0%	0.98	0.82	(0.16)	-16.0%	32.80	36.67	3.87	12.0%	25	131
3.0	34.22	38.77	4.55	13.0%	1.47	1.23	(0.24)	-16.0%	35.69	40.00	4.31	12.0%	25	53
4.0	36.63	41.69	5.06	14.0%	1.96	1.63	(0.33)	-17.0%	38.59	43.32	4.73	12.0%	15	29
5.0	39.04	44.62	5.58	14.0%	2.45	2.04	(0.41)	-17.0%	41.49	46.66	5.17	12.0%	11	27
6.0	41.45	47.54	6.09	15.0%	2.94	2.45	(0.49)	-17.0%	44.39	49.99	5.60	13.0%	22	9
7.0	43.86	50.47	6.61	15.0%	3.43	2.86	(0.57)	-17.0%	47.29	53.33	6.04	13.0%	19	14
8.0	46.27	53.39	7.12	15.0%	3.92	3.27	(0.65)	-17.0%	50.19	56.66	6.47	13.0%	14	4
9.0	48.67	56.31	7.64	16.0%	4.41	3.68	(0.73)	-17.0%	53.08	59.99	6.91	13.0%	11	7
10.0	51.08	59.24	8.16	16.0%	4.90	4.09	(0.81)	-17.0%	55.98	63.33	7.35	13.0%	18	7
15.0	63.12	73.86	10.74	17.0%	7.35	6.13	(1.22)	-17.0%	70.47	79.99	9.52	14.0%	121	14
20.0	75.16	88.47	13.31	18.0%	9.80	8.17	(1.63)	-17.0%	84.96	96.64	11.68	14.0%	112	4
25.0	87.21	103.09	15.88	18.0%	12.25	10.22	(2.03)	-17.0%	99.46	113.31	13.85	14.0%	119	4
30.0	99.25	117.71	18.46	19.0%	14.70	12.26	(2.44)	-17.0%	113.95	129.97	16.02	14.0%	97	6
35.0	111.29	132.33	21.04	19.0%	17.15	14.30	(2.85)	-17.0%	128.44	146.63	18.19	14.0%	102	1
40	123.33	146.95	23.62	19.0%	19.60	16.34	(3.26)	-17.0%	142.93	163.29	20.36	14.0%	84	1
45	135.37	161.57	26.20	19.0%	22.05	18.39	(3.66)	-17.0%	157.42	179.96	22.54	14.0%	73	1
50	147.41	176.19	28.78	20.0%	24.50	20.43	(4.07)	-17.0%	171.91	196.62	24.71	14.0%	51	1
100	267.82	322.37	54.55	20.0%	49.00	40.86	(8.14)	-17.0%	316.82	363.23	46.41	15.0%	145	0
150	388.23	468.56	80.33	21.0%	73.50	61.29	(12.21)	-17.0%	461.73	529.85	68.12	15.0%	10	0
200	508.64	614.74	106.10	21.0%	98.00	81.72	(16.28)	-17.0%	606.64	696.46	89.82	15.0%	3	0
300	749.46	907.11	157.65	21.0%	147.00	122.58	(24.42)	-17.0%	896.46	1,029.69	133.23	15.0%	2	0
400	990.28	1,199.48	209.20	21.0%	196.00	163.44	(32.56)	-17.0%	1,186.28	1,362.92	176.64	15.0%	0	0
500	1,231.11	1,491.85	260.74	21.0%	245.00	204.31	(40.69)	-17.0%	1,476.11	1,696.16	220.05	15.0%	1	0
1,000	2,435.21	2,953.70	518.49	21.0%	490.00	408.61	(81.39)	-17.0%	2,925.21	3,362.31	437.10	15.0%	0	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA < 250 MMT

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact	
Month	(Mcf)	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent
November	9	$ 48.67	$ 56.31	$ 7.64	16.0%	$ 4.41	$ 3.68	$ (0.73)	-17.0%	$ 53.08	$ 59.99	$ 6.91	13.0%
December	16	65.53	76.78	11.25	17.0%	7.84	6.54	(1.30)	-17.0%	73.37	83.32	9.95	14.0%
January	24	84.80	100.17	15.37	18.0%	11.76	9.81	(1.95)	-17.0%	96.56	109.98	13.42	14.0%
February	25	87.21	103.09	15.88	18.0%	12.25	10.22	(2.03)	-17.0%	99.46	113.31	13.85	14.0%
March	21	77.57	91.40	13.83	18.0%	10.29	8.58	(1.71)	-17.0%	87.86	99.98	12.12	14.0%
April	14	60.71	70.93	10.22	17.0%	6.86	5.72	(1.14)	-17.0%	67.57	76.65	9.08	13.0%
May	7	43.86	50.47	6.61	15.0%	3.43	2.86	(0.57)	-17.0%	47.29	53.33	6.04	13.0%
June	4	36.63	41.69	5.06	14.0%	1.96	1.63	(0.33)	-17.0%	38.59	43.32	4.73	12.0%
July	3	34.22	38.77	4.55	13.0%	1.47	1.23	(0.24)	-16.0%	35.69	40.00	4.31	12.0%
August	3	34.22	38.77	4.55	13.0%	1.47	1.23	(0.24)	-16.0%	35.69	40.00	4.31	12.0%
September	3	34.22	38.77	4.55	13.0%	1.47	1.23	(0.24)	-16.0%	35.69	40.00	4.31	12.0%
October	4	36.63	41.69	5.06	14.0%	1.96	1.63	(0.33)	-17.0%	38.59	43.32	4.73	12.0%
Total	133	$ 644.27	$ 748.84	$ 104.57	16.23%	$ 65.17	$ 54.36	$ (10.81)	-16.59%	$ 709.44	$ 803.20	$93.76	13.22%
Winter (Nov-Mar)	95	$ 363.78	$ 427.75	$ 63.97	17.58%	$ 46.55	$ 38.83	$ (7.72)	-16.58%	$ 410.33	$ 466.58	$56.25	13.71%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA > 250 Sales

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	37.00	50.00	13.00	35.14%
Volumetric Distribution Charge	Per Mcf	2.0555	2.2915	0.2360	11.48%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
Rider E - Customer Education	Per Mcf	0.0000	0.0000	0.0000	0.00%
Rider G - Merchant Function Charge	Per Mcf	0.0178	0.0217	0.0039	21.74%
Rider H - Gas Procurement Charge	Per Mcf	0.1149	0.1149	0.0000	0.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider A - Distribution Charge	Per Mcf	0.4453	0.4453	0.0000	0.00%
Rider A - Natural Gas Supply Charge	Per Mcf	5.0334	5.0334	0.0000	0.00%
Rider A - Gas Adjustment Charge	Per Mcf	0.2036	0.2036	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.1310)	(0.1310)	-100.00%
Total Gas Cost	Per Mcf	5.6823	5.5513	(0.1310)	-2.31%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA > 250 Sales

	Monthly Bill Impact													
	Delivery				Commodity				Total					
	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Number of Cycle Bills	
Mcf	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	January	July
0.0	38.75	50.00	11.25	29.0%	0.00	0.00	0.00	0.0%	38.75	50.00	11.25	29.0%	22	199
0.1	38.98	50.24	11.26	29.0%	0.57	0.56	(0.01)	-2.0%	39.55	50.80	11.25	28.0%	3	129
0.2	39.21	50.49	11.28	29.0%	1.14	1.11	(0.03)	-3.0%	40.35	51.60	11.25	28.0%	1	96
0.3	39.44	50.73	11.29	29.0%	1.70	1.67	(0.03)	-2.0%	41.14	52.40	11.26	27.0%	1	62
0.4	39.67	50.97	11.30	28.0%	2.27	2.22	(0.05)	-2.0%	41.94	53.19	11.25	27.0%	1	73
0.5	39.90	51.21	11.31	28.0%	2.84	2.78	(0.06)	-2.0%	42.74	53.99	11.25	26.0%	1	60
0.6	40.13	51.46	11.33	28.0%	3.41	3.33	(0.08)	-2.0%	43.54	54.79	11.25	26.0%	0	65
0.7	40.36	51.70	11.34	28.0%	3.98	3.89	(0.09)	-2.0%	44.34	55.59	11.25	25.0%	0	55
0.8	40.58	51.94	11.36	28.0%	4.55	4.44	(0.11)	-2.0%	45.13	56.38	11.25	25.0%	2	44
0.9	40.81	52.19	11.38	28.0%	5.11	5.00	(0.11)	-2.0%	45.92	57.19	11.27	25.0%	0	47
1.0	41.04	52.43	11.39	28.0%	5.68	5.55	(0.13)	-2.0%	46.72	57.98	11.26	24.0%	0	47
2.0	43.33	54.86	11.53	27.0%	11.36	11.10	(0.26)	-2.0%	54.69	65.96	11.27	21.0%	2	282
3.0	45.63	57.28	11.65	26.0%	17.05	16.65	(0.40)	-2.0%	62.68	73.93	11.25	18.0%	6	200
4.0	47.92	59.71	11.79	25.0%	22.73	22.21	(0.52)	-2.0%	70.65	81.92	11.27	16.0%	4	139
5.0	50.21	62.14	11.93	24.0%	28.41	27.76	(0.65)	-2.0%	78.62	89.90	11.28	14.0%	3	121
6.0	52.50	64.57	12.07	23.0%	34.09	33.31	(0.78)	-2.0%	86.59	97.88	11.29	13.0%	2	95
7.0	54.79	67.00	12.21	22.0%	39.78	38.86	(0.92)	-2.0%	94.57	105.86	11.29	12.0%	8	62
8.0	57.08	69.42	12.34	22.0%	45.46	44.41	(1.05)	-2.0%	102.54	113.83	11.29	11.0%	2	51
9.0	59.38	71.85	12.47	21.0%	51.14	49.96	(1.18)	-2.0%	110.52	121.81	11.29	10.0%	1	38
10	61.67	74.28	12.61	20.0%	56.82	55.51	(1.31)	-2.0%	118.49	129.79	11.30	10.0%	5	48
15	73.13	86.42	13.29	18.0%	85.23	83.27	(1.96)	-2.0%	158.36	169.69	11.33	7.0%	41	170
20	84.59	98.56	13.97	17.0%	113.65	111.03	(2.62)	-2.0%	198.24	209.59	11.35	6.0%	23	131
25	96.04	110.70	14.66	15.0%	142.06	138.78	(3.28)	-2.0%	238.10	249.48	11.38	5.0%	43	105
30	107.50	122.84	15.34	14.0%	170.47	166.54	(3.93)	-2.0%	277.97	289.38	11.41	4.0%	41	71
35	118.96	134.98	16.02	13.0%	198.88	194.29	(4.59)	-2.0%	317.84	329.27	11.43	4.0%	59	70
40	130.42	147.12	16.70	13.0%	227.29	222.05	(5.24)	-2.0%	357.71	369.17	11.46	3.0%	75	47
45	141.88	159.26	17.38	12.0%	255.70	249.81	(5.89)	-2.0%	397.58	409.07	11.49	3.0%	102	39
50	153.34	171.40	18.06	12.0%	284.12	277.56	(6.56)	-2.0%	437.46	448.96	11.50	3.0%	120	36
100	267.93	292.81	24.88	9.0%	568.23	555.13	(13.10)	-2.0%	836.16	847.94	11.78	1.0%	1302	77
150	382.51	414.21	31.70	8.0%	852.35	832.69	(19.66)	-2.0%	1,234.86	1,246.90	12.04	1.0%	503	5
200	497.10	535.62	38.52	8.0%	1,136.46	1,110.26	(26.20)	-2.0%	1,633.56	1,645.88	12.32	1.0%	223	0
300	726.27	778.42	52.15	7.0%	1,704.69	1,665.38	(39.31)	-2.0%	2,430.96	2,443.80	12.84	1.0%	106	0
400	955.45	1,021.23	65.78	7.0%	2,272.92	2,220.51	(52.41)	-2.0%	3,228.37	3,241.74	13.37	0.0%	19	0
500	1,184.62	1,264.04	79.42	7.0%	2,841.15	2,775.64	(65.51)	-2.0%	4,025.77	4,039.68	13.91	0.0%	4	0
1,000	2,330.49	2,478.08	147.59	6.0%	5,682.30	5,551.28	(131.02)	-2.0%	8,012.79	8,029.36	16.57	0.0%	3	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA > 250 Sales

Annual Bill Impact														
		Delivery				Commodity				Total				
	Usage	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		
Month	(Mcf)	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	
November	34	$ 116.67	$ 132.55	$ 15.88	14.0%	$ 193.20	$ 188.74	$ (4.46)	-2.0%	$ 309.87	$ 321.29	$ 11.42	4.0%	
December	62	180.84	200.54	19.70	11.0%	352.30	344.18	(8.12)	-2.0%	533.14	544.72	11.58	2.0%	
January	78	217.51	239.39	21.88	10.0%	443.22	433.00	(10.22)	-2.0%	660.73	672.39	11.66	2.0%	
February	78	217.51	239.39	21.88	10.0%	443.22	433.00	(10.22)	-2.0%	660.73	672.39	11.66	2.0%	
March	68	194.59	215.11	20.52	11.0%	386.40	377.49	(8.91)	-2.0%	580.99	592.60	11.61	2.0%	
April	52	157.92	176.26	18.34	12.0%	295.48	288.67	(6.81)	-2.0%	453.40	464.93	11.53	3.0%	
May	33	114.38	130.13	15.75	14.0%	187.52	183.19	(4.33)	-2.0%	301.90	313.32	11.42	4.0%	
June	14	70.84	83.99	13.15	19.0%	79.55	77.72	(1.83)	-2.0%	150.39	161.71	11.32	8.0%	
July	8	57.08	69.42	12.34	22.0%	45.46	44.41	(1.05)	-2.0%	102.54	113.83	11.29	11.0%	
August	7	54.79	67.00	12.21	22.0%	39.78	38.86	(0.92)	-2.0%	94.57	105.86	11.29	12.0%	
September	8	57.08	69.42	12.34	22.0%	45.46	44.41	(1.05)	-2.0%	102.54	113.83	11.29	11.0%	
October	15	73.13	86.42	13.29	18.0%	85.23	83.27	(1.96)	-2.0%	158.36	169.69	11.33	7.0%	
Total	457	$ 1,512.34	$ 1,709.62	$ 197.28	13.04%	$ 2,596.82	$ 2,536.94	$ (59.88)	-2.31%	$ 4,109.16	$ 4,246.56	$137.40	3.34%	
Winter (Nov-Mar)	320	$ 927.12	$ 1,026.98	$ 99.86	10.77%	$ 1,818.34	$ 1,776.41	$ (41.93)	-2.31%	$ 2,745.46	$ 2,803.39	$57.93	2.11%	

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA > 250 SATC

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	37.00	50.00	13.00	35.14%
Volumetric Distribution Charge	Per Mcf	2.0555	2.2915	0.2360	11.48%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
Rider E - Customer Education	Per Mcf	0.0000	0.0000	0.0000	0.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider A - Distribution Charge	Per Mcf	0.4453	0.4453	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.1310)	(0.1310)	-100.00%
Total Gas Cost	Per Mcf	0.4453	0.3143	(0.1310)	-29.42%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA > 250 SATC

	Monthly Bill Impact													
	Delivery				Commodity				Total					
	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Number of Cycle Bills	
Mcf	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	January	July
0.0	38.75	50.00	11.25	29.0%	0.00	0.00	0.00	0.0%	38.75	50.00	11.25	29.0%	1	16
0.1	38.97	50.23	11.26	29.0%	0.04	0.03	(0.01)	-25.0%	39.01	50.26	11.25	29.0%	0	8
0.2	39.18	50.46	11.28	29.0%	0.09	0.06	(0.03)	-33.0%	39.27	50.52	11.25	29.0%	0	7
0.3	39.40	50.69	11.29	29.0%	0.13	0.09	(0.04)	-31.0%	39.53	50.78	11.25	28.0%	0	3
0.4	39.61	50.92	11.31	29.0%	0.18	0.13	(0.05)	-28.0%	39.79	51.05	11.26	28.0%	0	5
0.5	39.83	51.15	11.32	28.0%	0.22	0.16	(0.06)	-27.0%	40.05	51.31	11.26	28.0%	0	6
0.6	40.04	51.37	11.33	28.0%	0.27	0.19	(0.08)	-30.0%	40.31	51.56	11.25	28.0%	0	3
0.7	40.26	51.60	11.34	28.0%	0.31	0.22	(0.09)	-29.0%	40.57	51.82	11.25	28.0%	0	8
0.8	40.47	51.83	11.36	28.0%	0.36	0.25	(0.11)	-31.0%	40.83	52.08	11.25	28.0%	0	2
0.9	40.69	52.06	11.37	28.0%	0.40	0.28	(0.12)	-30.0%	41.09	52.34	11.25	27.0%	0	6
1.0	40.90	52.29	11.39	28.0%	0.45	0.31	(0.14)	-31.0%	41.35	52.60	11.25	27.0%	0	7
2.0	43.06	54.58	11.52	27.0%	0.89	0.63	(0.26)	-29.0%	43.95	55.21	11.26	26.0%	0	37
3.0	45.21	56.87	11.66	26.0%	1.34	0.94	(0.40)	-30.0%	46.55	57.81	11.26	24.0%	0	24
4.0	47.36	59.17	11.81	25.0%	1.78	1.26	(0.52)	-29.0%	49.14	60.43	11.29	23.0%	0	21
5.0	49.51	61.46	11.95	24.0%	2.23	1.57	(0.66)	-30.0%	51.74	63.03	11.29	22.0%	1	11
6.0	51.67	63.75	12.08	23.0%	2.67	1.89	(0.78)	-29.0%	54.34	65.64	11.30	21.0%	0	7
7.0	53.82	66.04	12.22	23.0%	3.12	2.20	(0.92)	-29.0%	56.94	68.24	11.30	20.0%	0	5
8.0	55.97	68.33	12.36	22.0%	3.56	2.51	(1.05)	-29.0%	59.53	70.84	11.31	19.0%	1	5
9.0	58.13	70.62	12.49	21.0%	4.01	2.83	(1.18)	-29.0%	62.14	73.45	11.31	18.0%	1	6
10	60.28	72.92	12.64	21.0%	4.45	3.14	(1.31)	-29.0%	64.73	76.06	11.33	18.0%	0	7
15	71.04	84.37	13.33	19.0%	6.68	4.71	(1.97)	-29.0%	77.72	89.08	11.36	15.0%	1	24
20	81.81	95.83	14.02	17.0%	8.91	6.29	(2.62)	-29.0%	90.72	102.12	11.40	13.0%	1	11
25	92.57	107.29	14.72	16.0%	11.13	7.86	(3.27)	-29.0%	103.70	115.15	11.45	11.0%	5	18
30	103.33	118.75	15.42	15.0%	13.36	9.43	(3.93)	-29.0%	116.69	128.18	11.49	10.0%	6	11
35	114.10	130.20	16.10	14.0%	15.59	11.00	(4.59)	-29.0%	129.69	141.20	11.51	9.0%	2	10
40	124.86	141.66	16.80	13.0%	17.81	12.57	(5.24)	-29.0%	142.67	154.23	11.56	8.0%	5	8
45	135.63	153.12	17.49	13.0%	20.04	14.14	(5.90)	-29.0%	155.67	167.26	11.59	7.0%	13	2
50	146.39	164.58	18.19	12.0%	22.27	15.71	(6.56)	-29.0%	168.66	180.29	11.63	7.0%	11	6
100	254.03	279.15	25.12	10.0%	44.53	31.43	(13.10)	-29.0%	298.56	310.58	12.02	4.0%	164	14
150	361.67	393.73	32.06	9.0%	66.80	47.14	(19.66)	-29.0%	428.47	440.87	12.40	3.0%	74	1
200	469.30	508.30	39.00	8.0%	89.06	62.86	(26.20)	-29.0%	558.36	571.16	12.80	2.0%	24	0
300	684.58	737.46	52.88	8.0%	133.59	94.28	(39.31)	-29.0%	818.17	831.74	13.57	2.0%	11	0
400	899.86	966.61	66.75	7.0%	178.12	125.71	(52.41)	-29.0%	1,077.98	1,092.32	14.34	1.0%	0	0
500	1,115.14	1,195.76	80.62	7.0%	222.65	157.14	(65.51)	-29.0%	1,337.79	1,352.90	15.11	1.0%	1	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA > 250 SATC

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact	
Month	(Mcf)	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent
November	35	$ 114.10	$ 130.20	$ 16.10	14.0%	$ 15.59	$ 11.00	$ (4.59)	-29.0%	$ 129.69	$ 141.20	$ 11.51	9.0%
December	38	120.56	137.08	16.52	14.0%	16.92	11.94	(4.98)	-29.0%	137.48	149.02	11.54	8.0%
January	40	124.86	141.66	16.80	13.0%	17.81	12.57	(5.24)	-29.0%	142.67	154.23	11.56	8.0%
February	40	124.86	141.66	16.80	13.0%	17.81	12.57	(5.24)	-29.0%	142.67	154.23	11.56	8.0%
March	39	122.71	139.37	16.66	14.0%	17.37	12.26	(5.11)	-29.0%	140.08	151.63	11.55	8.0%
April	37	118.40	134.79	16.39	14.0%	16.48	11.63	(4.85)	-29.0%	134.88	146.42	11.54	9.0%
May	35	114.10	130.20	16.10	14.0%	15.59	11.00	(4.59)	-29.0%	129.69	141.20	11.51	9.0%
June	34	111.95	127.91	15.96	14.0%	15.14	10.69	(4.45)	-29.0%	127.09	138.60	11.51	9.0%
July	33	109.79	125.62	15.83	14.0%	14.69	10.37	(4.32)	-29.0%	124.48	135.99	11.51	9.0%
August	33	109.79	125.62	15.83	14.0%	14.69	10.37	(4.32)	-29.0%	124.48	135.99	11.51	9.0%
September	33	109.79	125.62	15.83	14.0%	14.69	10.37	(4.32)	-29.0%	124.48	135.99	11.51	9.0%
October	33	109.79	125.62	15.83	14.0%	14.69	10.37	(4.32)	-29.0%	124.48	135.99	11.51	9.0%
Total	430	$ 1,390.70	$ 1,585.35	$ 194.65	14.00%	$ 191.47	$ 135.14	$ (56.33)	-29.42%	$ 1,582.17	$ 1,720.49	$138.32	8.74%
Winter (Nov-Mar)	192	$ 607.09	$ 689.97	$ 82.88	13.65%	$ 85.50	$ 60.34	$ (25.16)	-29.43%	$ 692.59	$ 750.31	$57.72	8.33%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA > 250 MMT

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	37.00	50.00	13.00	35.14%
Volumetric Distribution Charge	Per Mcf	2.0555	2.2915	0.2360	11.48%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
MMT Gas Cost Charge	Per Mcf	0.4900	0.4900	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.1131)	(0.1131)	-100.00%
Total Gas Cost	Per Mcf	0.4900	0.3769	(0.1131)	-23.08%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA > 250 MMT

	Monthly Bill Impact													
	Delivery				Commodity				Total					
	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Number of Cycle Bills	
Mcf	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	January	July
0.0	37.00	50.00	13.00	35.0%	0.00	0.00	0.00	0.0%	37.00	50.00	13.00	35.0%	3	54
0.1	37.22	50.23	13.01	35.0%	0.05	0.04	(0.01)	-20.0%	37.27	50.27	13.00	35.0%	0	56
0.2	37.43	50.46	13.03	35.0%	0.10	0.08	(0.02)	-20.0%	37.53	50.54	13.01	35.0%	0	29
0.3	37.65	50.69	13.04	35.0%	0.15	0.11	(0.04)	-27.0%	37.80	50.80	13.00	34.0%	0	28
0.4	37.86	50.92	13.06	34.0%	0.20	0.15	(0.05)	-25.0%	38.06	51.07	13.01	34.0%	0	33
0.5	38.08	51.15	13.07	34.0%	0.25	0.19	(0.06)	-24.0%	38.33	51.34	13.01	34.0%	0	29
0.6	38.29	51.37	13.08	34.0%	0.29	0.23	(0.06)	-21.0%	38.58	51.60	13.02	34.0%	0	35
0.7	38.51	51.60	13.09	34.0%	0.34	0.26	(0.08)	-24.0%	38.85	51.86	13.01	33.0%	0	22
0.8	38.72	51.83	13.11	34.0%	0.39	0.30	(0.09)	-23.0%	39.11	52.13	13.02	33.0%	0	16
0.9	38.94	52.06	13.12	34.0%	0.44	0.34	(0.10)	-23.0%	39.38	52.40	13.02	33.0%	0	22
1.0	39.15	52.29	13.14	34.0%	0.49	0.38	(0.11)	-22.0%	39.64	52.67	13.03	33.0%	0	30
2.0	41.31	54.58	13.27	32.0%	0.98	0.75	(0.23)	-23.0%	42.29	55.33	13.04	31.0%	0	141
3.0	43.46	56.87	13.41	31.0%	1.47	1.13	(0.34)	-23.0%	44.93	58.00	13.07	29.0%	0	104
4.0	45.61	59.17	13.56	30.0%	1.96	1.51	(0.45)	-23.0%	47.57	60.68	13.11	28.0%	0	67
5.0	47.76	61.46	13.70	29.0%	2.45	1.88	(0.57)	-23.0%	50.21	63.34	13.13	26.0%	1	55
6.0	49.92	63.75	13.83	28.0%	2.94	2.26	(0.68)	-23.0%	52.86	66.01	13.15	25.0%	0	44
7.0	52.07	66.04	13.97	27.0%	3.43	2.64	(0.79)	-23.0%	55.50	68.68	13.18	24.0%	3	31
8.0	54.22	68.33	14.11	26.0%	3.92	3.02	(0.90)	-23.0%	58.14	71.35	13.21	23.0%	0	28
9.0	56.37	70.62	14.25	25.0%	4.41	3.39	(1.02)	-23.0%	60.78	74.01	13.23	22.0%	0	29
10.0	58.53	72.92	14.39	25.0%	4.90	3.77	(1.13)	-23.0%	63.43	76.69	13.26	21.0%	0	18
15.0	69.29	84.37	15.08	22.0%	7.35	5.65	(1.70)	-23.0%	76.64	90.02	13.38	17.0%	2	84
20.0	80.06	95.83	15.77	20.0%	9.80	7.54	(2.26)	-23.0%	89.86	103.37	13.51	15.0%	8	49
25.0	90.82	107.29	16.47	18.0%	12.25	9.42	(2.83)	-23.0%	103.07	116.71	13.64	13.0%	7	55
30.0	101.58	118.75	17.17	17.0%	14.70	11.31	(3.39)	-23.0%	116.28	130.06	13.78	12.0%	11	44
35.0	112.35	130.20	17.85	16.0%	17.15	13.19	(3.96)	-23.0%	129.50	143.39	13.89	11.0%	10	25
40	123.11	141.66	18.55	15.0%	19.60	15.08	(4.52)	-23.0%	142.71	156.74	14.03	10.0%	15	21
45	133.87	153.12	19.25	14.0%	22.05	16.96	(5.09)	-23.0%	155.92	170.08	14.16	9.0%	28	26
50	144.64	164.58	19.94	14.0%	24.50	18.85	(5.65)	-23.0%	169.14	183.43	14.29	8.0%	25	16
100	252.28	279.15	26.87	11.0%	49.00	37.69	(11.31)	-23.0%	301.28	316.84	15.56	5.0%	541	50
150	359.92	393.73	33.81	9.0%	73.50	56.54	(16.96)	-23.0%	433.42	450.27	16.85	4.0%	331	2
200	467.55	508.30	40.75	9.0%	98.00	75.39	(22.61)	-23.0%	565.55	583.69	18.14	3.0%	162	0
300	682.83	737.46	54.63	8.0%	147.00	113.08	(33.92)	-23.0%	829.83	850.54	20.71	2.0%	84	1
400	898.11	966.61	68.50	8.0%	196.00	150.77	(45.23)	-23.0%	1,094.11	1,117.38	23.27	2.0%	14	0
500	1,113.38	1,195.76	82.38	7.0%	245.00	188.47	(56.53)	-23.0%	1,358.38	1,384.23	25.85	2.0%	6	0
1,000	2,189.77	2,341.52	151.75	7.0%	490.00	376.93	(113.07)	-23.0%	2,679.77	2,718.45	38.68	1.0%	0	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SCPA > 250 MMT

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact	
Month	(Mcf)	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent
November	43	$ 129.57	$ 148.54	$ 18.97	15.0%	$ 21.07	$ 16.21	$ (4.86)	-23.0%	$ 150.64	$ 164.75	$ 14.11	9.0%
December	72	192.00	214.99	22.99	12.0%	35.28	27.14	(8.14)	-23.0%	227.28	242.13	14.85	7.0%
January	90	230.75	256.24	25.49	11.0%	44.10	33.92	(10.18)	-23.0%	274.85	290.16	15.31	6.0%
February	89	228.60	253.95	25.35	11.0%	43.61	33.55	(10.06)	-23.0%	272.21	287.50	15.29	6.0%
March	79	207.07	231.03	23.96	12.0%	38.71	29.78	(8.93)	-23.0%	245.78	260.81	15.03	6.0%
April	61	168.32	189.78	21.46	13.0%	29.89	22.99	(6.90)	-23.0%	198.21	212.77	14.56	7.0%
May	41	125.26	143.95	18.69	15.0%	20.09	15.45	(4.64)	-23.0%	145.35	159.40	14.05	10.0%
June	21	82.21	98.12	15.91	19.0%	10.29	7.92	(2.37)	-23.0%	92.50	106.04	13.54	15.0%
July	14	67.14	82.08	14.94	22.0%	6.86	5.28	(1.58)	-23.0%	74.00	87.36	13.36	18.0%
August	13	64.99	79.79	14.80	23.0%	6.37	4.90	(1.47)	-23.0%	71.36	84.69	13.33	19.0%
September	14	67.14	82.08	14.94	22.0%	6.86	5.28	(1.58)	-23.0%	74.00	87.36	13.36	18.0%
October	22	84.36	100.41	16.05	19.0%	10.78	8.29	(2.49)	-23.0%	95.14	108.70	13.56	14.0%
Total	559	$ 1,647.41	$ 1,880.96	$ 233.55	14.18%	$ 273.91	$ 210.71	$ (63.20)	-23.07%	$ 1,921.32	$ 2,091.67	$170.35	8.87%
Winter (Nov-Mar)	373	$ 987.99	$ 1,104.75	$ 116.76	11.82%	$ 182.77	$ 140.60	$ (42.17)	-23.07%	$ 1,170.76	$ 1,245.35	$74.59	6.37%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LCPA Sales

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	151.00	151.00	0.00	0.00%
Volumetric Distribution Charge	Per Mcf	1.6622	1.9763	0.3141	18.90%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
Rider E - Customer Education	Per Mcf	0.0000	0.0000	0.0000	0.00%
Rider G - Merchant Function Charge	Per Mcf	0.0178	0.0217	0.0039	21.74%
Rider H - Gas Procurement Charge	Per Mcf	0.1149	0.1149	0.0000	0.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider A - Distribution Charge	Per Mcf	0.4453	0.4453	0.0000	0.00%
Rider A - Natural Gas Supply Charge	Per Mcf	5.0334	5.0334	0.0000	0.00%
Rider A - Gas Adjustment Charge	Per Mcf	0.2036	0.2036	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.1091)	(0.1091)	-100.00%
Total Gas Cost	Per Mcf	5.6823	5.5733	(0.1091)	-1.92%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LCPA Sales

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact			
Mcf	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	January	July
0.0	158.15	151.00	(7.15)	-5.0%	0.00	0.00	0.00	0.0%	158.15	151.00	(7.15)	-5.0%	8	27
0.1	158.33	151.21	(7.12)	-4.0%	0.57	0.56	(0.01)	-2.0%	158.90	151.77	(7.13)	-4.0%	1	8
0.2	158.52	151.42	(7.10)	-4.0%	1.14	1.11	(0.03)	-3.0%	159.66	152.53	(7.13)	-4.0%	0	4
0.3	158.71	151.63	(7.08)	-4.0%	1.70	1.67	(0.03)	-2.0%	160.41	153.30	(7.11)	-4.0%	0	2
0.4	158.90	151.85	(7.05)	-4.0%	2.27	2.23	(0.04)	-2.0%	161.17	154.08	(7.09)	-4.0%	0	3
0.5	159.09	152.06	(7.03)	-4.0%	2.84	2.79	(0.05)	-2.0%	161.93	154.85	(7.08)	-4.0%	1	2
0.6	159.27	152.27	(7.00)	-4.0%	3.41	3.34	(0.07)	-2.0%	162.68	155.61	(7.07)	-4.0%	0	4
0.7	159.46	152.48	(6.98)	-4.0%	3.98	3.90	(0.08)	-2.0%	163.44	156.38	(7.06)	-4.0%	1	4
0.8	159.65	152.69	(6.96)	-4.0%	4.55	4.46	(0.09)	-2.0%	164.20	157.15	(7.05)	-4.0%	0	0
0.9	159.84	152.90	(6.94)	-4.0%	5.11	5.02	(0.09)	-2.0%	164.95	157.92	(7.03)	-4.0%	2	3
1.0	160.03	153.11	(6.92)	-4.0%	5.68	5.57	(0.11)	-2.0%	165.71	158.68	(7.03)	-4.0%	0	11
2.0	161.91	155.23	(6.68)	-4.0%	11.36	11.15	(0.21)	-2.0%	173.27	166.38	(6.89)	-4.0%	0	19
3.0	163.79	157.34	(6.45)	-4.0%	17.05	16.72	(0.33)	-2.0%	180.84	174.06	(6.78)	-4.0%	0	23
4.0	165.66	159.45	(6.21)	-4.0%	22.73	22.29	(0.44)	-2.0%	188.39	181.74	(6.65)	-4.0%	0	17
5.0	167.54	161.56	(5.98)	-4.0%	28.41	27.87	(0.54)	-2.0%	195.95	189.43	(6.52)	-3.0%	0	8
6.0	169.42	163.68	(5.74)	-3.0%	34.09	33.44	(0.65)	-2.0%	203.51	197.12	(6.39)	-3.0%	0	13
7.0	171.30	165.79	(5.51)	-3.0%	39.78	39.01	(0.77)	-2.0%	211.08	204.80	(6.28)	-3.0%	0	11
8.0	173.18	167.90	(5.28)	-3.0%	45.46	44.59	(0.87)	-2.0%	218.64	212.49	(6.15)	-3.0%	0	3
9.0	175.06	170.02	(5.04)	-3.0%	51.14	50.16	(0.98)	-2.0%	226.20	220.18	(6.02)	-3.0%	0	5
10	176.94	172.13	(4.81)	-3.0%	56.82	55.73	(1.09)	-2.0%	233.76	227.86	(5.90)	-3.0%	0	8
15	186.34	182.69	(3.65)	-2.0%	85.23	83.60	(1.63)	-2.0%	271.57	266.29	(5.28)	-2.0%	2	20
20	195.74	193.26	(2.48)	-1.0%	113.65	111.47	(2.18)	-2.0%	309.39	304.73	(4.66)	-2.0%	5	17
25	205.14	203.82	(1.32)	-1.0%	142.06	139.33	(2.73)	-2.0%	347.20	343.15	(4.05)	-1.0%	1	14
30	214.54	214.39	(0.15)	0.0%	170.47	167.20	(3.27)	-2.0%	385.01	381.59	(3.42)	-1.0%	3	13
35	223.94	224.95	1.01	0.0%	198.88	195.06	(3.82)	-2.0%	422.82	420.01	(2.81)	-1.0%	5	9
40	233.34	235.52	2.18	1.0%	227.29	222.93	(4.36)	-2.0%	460.63	458.45	(2.18)	0.0%	1	11
45	242.74	246.08	3.34	1.0%	255.70	250.80	(4.90)	-2.0%	498.44	496.88	(1.56)	0.0%	6	9
50	252.14	256.64	4.50	2.0%	284.12	278.66	(5.46)	-2.0%	536.26	535.30	(0.96)	0.0%	2	11
100	346.13	362.29	16.16	5.0%	568.23	557.33	(10.90)	-2.0%	914.36	919.62	5.26	1.0%	26	87
150	440.12	467.93	27.81	6.0%	852.35	835.99	(16.36)	-2.0%	1,292.47	1,303.92	11.45	1.0%	53	33
200	534.11	573.58	39.47	7.0%	1,136.46	1,114.65	(21.81)	-2.0%	1,670.57	1,688.23	17.66	1.0%	57	11
300	722.10	784.87	62.77	9.0%	1,704.69	1,671.98	(32.71)	-2.0%	2,426.79	2,456.85	30.06	1.0%	115	7
400	910.08	996.16	86.08	9.0%	2,272.92	2,229.30	(43.62)	-2.0%	3,183.00	3,225.46	42.46	1.0%	68	0
500	1,098.06	1,207.45	109.39	10.0%	2,841.15	2,786.63	(54.52)	-2.0%	3,939.21	3,994.08	54.87	1.0%	30	0
1,000	2,037.98	2,263.90	225.92	11.0%	5,682.30	5,573.25	(109.05)	-2.0%	7,720.28	7,837.15	116.87	2.0%	61	4
2,000	3,917.81	4,376.79	458.98	12.0%	11,364.60	11,146.50	(218.10)	-2.0%	15,282.41	15,523.29	240.88	2.0%	6	2
3,000	5,797.64	6,489.69	692.05	12.0%	17,046.90	16,719.75	(327.15)	-2.0%	22,844.54	23,209.44	364.90	2.0%	2	0
4,000	7,677.48	8,602.59	925.11	12.0%	22,729.20	22,293.00	(436.20)	-2.0%	30,406.68	30,895.59	488.91	2.0%	1	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LCPA Sales

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage		Proposed	Bill Impact			Proposed	Bill Impact				Bill Impact	
Month	(Mcf)	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Proposed Rates	Amount	Percent
November	116	$ 376.21	$ 396.10	$ 19.89	5.0%	$ 659.15	$ 646.50	$ (12.65)	-2.0%	$ 1,035.36	$ 1,042.60	$ 7.24	1.0%
December	126	395.00	417.22	22.22	6.0%	715.97	702.23	(13.74)	-2.0%	1,110.97	1,119.45	8.48	1.0%
January	130	402.52	425.68	23.16	6.0%	738.70	724.52	(14.18)	-2.0%	1,141.22	1,150.20	8.98	1.0%
February	128	398.76	421.45	22.69	6.0%	727.33	713.38	(13.95)	-2.0%	1,126.09	1,134.83	8.74	1.0%
March	125	393.12	415.11	21.99	6.0%	710.29	696.66	(13.63)	-2.0%	1,103.41	1,111.77	8.36	1.0%
April	121	385.61	406.66	21.05	5.0%	687.56	674.36	(13.20)	-2.0%	1,073.17	1,081.02	7.85	1.0%
May	116	376.21	396.10	19.89	5.0%	659.15	646.50	(12.65)	-2.0%	1,035.36	1,042.60	7.24	1.0%
June	111	366.81	385.53	18.72	5.0%	630.74	618.63	(12.11)	-2.0%	997.55	1,004.16	6.61	1.0%
July	108	361.17	379.19	18.02	5.0%	613.69	601.91	(11.78)	-2.0%	974.86	981.10	6.24	1.0%
August	108	361.17	379.19	18.02	5.0%	613.69	601.91	(11.78)	-2.0%	974.86	981.10	6.24	1.0%
September	109	363.05	381.31	18.26	5.0%	619.37	607.48	(11.89)	-2.0%	982.42	988.79	6.37	1.0%
October	111	366.81	385.53	18.72	5.0%	630.74	618.63	(12.11)	-2.0%	997.55	1,004.16	6.61	1.0%
Total	1,409	$ 4,546.44	$ 4,789.07	$ 242.63	5.34%	$ 8,006.38	$ 7,852.71	$ (153.67)	-1.92%	$ 12,552.82	$ 12,641.78	$88.96	0.71%
Winter (Nov-Mar)	625	$ 1,965.61	$ 2,075.56	$ 109.95	5.59%	$ 3,551.44	$ 3,483.29	$ (68.15)	-1.92%	$ 5,517.05	$ 5,558.85	$41.80	0.76%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LCPA SATC

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	151.00	151.00	0.00	0.00%
Volumetric Distribution Charge	Per Mcf	1.6622	1.9763	0.3141	18.90%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
Rider E - Customer Education	Per Mcf	0.00%	0.00%	0.00%	0.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider A - Distribution Charge	Per Mcf	0.4453	0.4453	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.1091)	(0.1091)	-100.00%
Total Gas Cost	Per Mcf	0.44530	0.33625	(0.10905)	-24.49%

National Fuel Gas Distribution Corporation
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	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact			
Mcf	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	January	July
0.0	158.15	151.00	(7.15)	-5.0%	0.00	0.00	0.00	0.0%	158.15	151.00	(7.15)	-5.0%	0	1
0.1	158.32	151.20	(7.12)	-4.0%	0.04	0.03	(0.01)	-25.0%	158.36	151.23	(7.13)	-5.0%	0	1
0.2	158.49	151.40	(7.09)	-4.0%	0.09	0.07	(0.02)	-22.0%	158.58	151.47	(7.11)	-4.0%	0	0
0.3	158.67	151.59	(7.08)	-4.0%	0.13	0.10	(0.03)	-23.0%	158.80	151.69	(7.11)	-4.0%	0	0
0.4	158.84	151.79	(7.05)	-4.0%	0.18	0.13	(0.05)	-28.0%	159.02	151.92	(7.10)	-4.0%	0	0
0.5	159.02	151.99	(7.03)	-4.0%	0.22	0.17	(0.05)	-23.0%	159.24	152.16	(7.08)	-4.0%	0	0
0.6	159.19	152.19	(7.00)	-4.0%	0.27	0.20	(0.07)	-26.0%	159.46	152.39	(7.07)	-4.0%	0	1
0.7	159.36	152.38	(6.98)	-4.0%	0.31	0.24	(0.07)	-23.0%	159.67	152.62	(7.05)	-4.0%	0	0
0.8	159.54	152.58	(6.96)	-4.0%	0.36	0.27	(0.09)	-25.0%	159.90	152.85	(7.05)	-4.0%	0	0
0.9	159.71	152.78	(6.93)	-4.0%	0.40	0.30	(0.10)	-25.0%	160.11	153.08	(7.03)	-4.0%	0	0
1.0	159.89	152.98	(6.91)	-4.0%	0.45	0.34	(0.11)	-24.0%	160.34	153.32	(7.02)	-4.0%	0	1
2.0	161.63	154.95	(6.68)	-4.0%	0.89	0.67	(0.22)	-25.0%	162.52	155.62	(6.90)	-4.0%	0	0
3.0	163.37	156.93	(6.44)	-4.0%	1.34	1.01	(0.33)	-25.0%	164.71	157.94	(6.77)	-4.0%	0	0
4.0	165.11	158.91	(6.20)	-4.0%	1.78	1.35	(0.43)	-24.0%	166.89	160.26	(6.63)	-4.0%	0	2
5.0	166.85	160.88	(5.97)	-4.0%	2.23	1.68	(0.55)	-25.0%	169.08	162.56	(6.52)	-4.0%	0	0
6.0	168.59	162.86	(5.73)	-3.0%	2.67	2.02	(0.65)	-24.0%	171.26	164.88	(6.38)	-4.0%	0	2
7.0	170.33	164.83	(5.50)	-3.0%	3.12	2.35	(0.77)	-25.0%	173.45	167.18	(6.27)	-4.0%	0	0
8.0	172.07	166.81	(5.26)	-3.0%	3.56	2.69	(0.87)	-24.0%	175.63	169.50	(6.13)	-3.0%	0	1
9.0	173.81	168.79	(5.02)	-3.0%	4.01	3.03	(0.98)	-24.0%	177.82	171.82	(6.00)	-3.0%	0	0
10	175.55	170.76	(4.79)	-3.0%	4.45	3.36	(1.09)	-24.0%	180.00	174.12	(5.88)	-3.0%	0	0
15	184.26	180.64	(3.62)	-2.0%	6.68	5.04	(1.64)	-25.0%	190.94	185.68	(5.26)	-3.0%	0	2
20	192.96	190.53	(2.43)	-1.0%	8.91	6.73	(2.18)	-24.0%	201.87	197.26	(4.61)	-2.0%	0	1
25	201.67	200.41	(1.26)	-1.0%	11.13	8.41	(2.72)	-24.0%	212.80	208.82	(3.98)	-2.0%	0	6
30	210.37	210.29	(0.08)	0.0%	13.36	10.09	(3.27)	-24.0%	223.73	220.38	(3.35)	-1.0%	0	2
35	219.08	220.17	1.09	0.0%	15.59	11.77	(3.82)	-25.0%	234.67	231.94	(2.73)	-1.0%	0	1
40	227.78	230.05	2.27	1.0%	17.81	13.45	(4.36)	-24.0%	245.59	243.50	(2.09)	-1.0%	0	0
45	236.48	239.93	3.45	1.0%	20.04	15.13	(4.91)	-25.0%	256.52	255.06	(1.46)	-1.0%	1	2
50	245.19	249.82	4.63	2.0%	22.27	16.81	(5.46)	-25.0%	267.46	266.63	(0.83)	0.0%	0	1
100	332.23	348.63	16.40	5.0%	44.53	33.63	(10.90)	-24.0%	376.76	382.26	5.50	1.0%	1	10
150	419.27	447.45	28.18	7.0%	66.80	50.44	(16.36)	-24.0%	486.07	497.89	11.82	2.0%	3	4
200	506.32	546.27	39.95	8.0%	89.06	67.25	(21.81)	-24.0%	595.38	613.52	18.14	3.0%	5	4
300	680.40	743.90	63.50	9.0%	133.59	100.88	(32.71)	-24.0%	813.99	844.78	30.79	4.0%	12	1
400	854.49	941.53	87.04	10.0%	178.12	134.50	(43.62)	-24.0%	1,032.61	1,076.03	43.42	4.0%	15	0
500	1,028.57	1,139.17	110.60	11.0%	222.65	168.13	(54.52)	-24.0%	1,251.22	1,307.30	56.08	4.0%	8	0
1,000	1,899.00	2,127.33	228.33	12.0%	445.30	336.25	(109.05)	-24.0%	2,344.30	2,463.58	119.28	5.0%	3	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LCPA SATC

Annual Bill Impact															
		Delivery				Commodity				Total					
	Usage		Proposed	Bill Impact			Proposed	Bill Impact					Bill Impact		
Month	(Mcf)	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Proposed Rates		Amount	Percent	
November	126	$ 377.49	$ 400.02	$ 22.53	6.0%	$ 56.11	$ 42.37	$ (13.74)	-24.0%	$ 433.60	$ 442.39		$ 8.79	2.0%	
December	180	471.50	506.74	35.24	7.0%	80.15	60.53	(19.62)	-24.0%	551.65	567.27		15.62	3.0%	
January	255	602.06	654.96	52.90	9.0%	113.55	85.74	(27.81)	-24.0%	715.61	740.70		25.09	4.0%	
February	245	584.66	635.20	50.54	9.0%	109.10	82.38	(26.72)	-24.0%	693.76	717.58		23.82	3.0%	
March	228	555.06	601.60	46.54	8.0%	101.53	76.67	(24.86)	-24.0%	656.59	678.27		21.68	3.0%	
April	168	450.61	483.02	32.41	7.0%	74.81	56.49	(18.32)	-24.0%	525.42	539.51		14.09	3.0%	
May	103	337.45	354.56	17.11	5.0%	45.87	34.63	(11.24)	-25.0%	383.32	389.19		5.87	2.0%	
June	61	264.34	271.56	7.22	3.0%	27.16	20.51	(6.65)	-24.0%	291.50	292.07		0.57	0.0%	
July	42	231.26	234.01	2.75	1.0%	18.70	14.12	(4.58)	-24.0%	249.96	248.13		(1.83)	-1.0%	
August	38	224.30	226.10	1.80	1.0%	16.92	12.78	(4.14)	-24.0%	241.22	238.88		(2.34)	-1.0%	
September	49	243.45	247.84	4.39	2.0%	21.82	16.48	(5.34)	-24.0%	265.27	264.32		(0.95)	0.0%	
October	59	260.86	267.60	6.74	3.0%	26.27	19.84	(6.43)	-24.0%	287.13	287.44		0.31	0.0%	
Total	1,554	$ 4,603.04	$ 4,883.21	$ 280.17	6.09%	$ 691.99	$ 522.54	$ (169.45)	-24.49%	$ 5,295.03	$ 5,405.75		$110.72	2.09%	
Winter (Nov-Mar)	1,034	$ 2,590.77	$ 2,798.52	$ 207.75	8.02%	$ 460.44	$ 347.69	$ (112.75)	-24.49%	$ 3,051.21	$ 3,146.21		$95.00	3.11%	

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LCPA MMT

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	151.00	151.00	0.00	0.00%
Volumetric Distribution Charge	Per Mcf	1.6622	1.9763	0.3141	18.90%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
MMT Gas Cost Charge	Per Mcf	0.4900	0.4900	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.1292)	(0.1292)	-100.00%
Total Gas Cost	Per Mcf	0.4900	0.3608	(0.1292)	-26.37%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LCPA MMT

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact			
Mcf	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	January	July
0.0	151.00	151.00	0.00	0.0%	0.00	0.00	0.00	0.0%	151.00	151.00	0.00	0.0%	3	24
0.1	151.17	151.20	0.03	0.0%	0.05	0.04	(0.01)	-20.0%	151.22	151.24	0.02	0.0%	0	2
0.2	151.35	151.40	0.05	0.0%	0.10	0.07	(0.03)	-30.0%	151.45	151.47	0.02	0.0%	0	3
0.3	151.52	151.59	0.07	0.0%	0.15	0.11	(0.04)	-27.0%	151.67	151.70	0.03	0.0%	0	4
0.4	151.70	151.79	0.09	0.0%	0.20	0.14	(0.06)	-30.0%	151.90	151.93	0.03	0.0%	0	6
0.5	151.87	151.99	0.12	0.0%	0.25	0.18	(0.07)	-28.0%	152.12	152.17	0.05	0.0%	0	2
0.6	152.04	152.19	0.15	0.0%	0.29	0.22	(0.07)	-24.0%	152.33	152.41	0.08	0.0%	0	6
0.7	152.22	152.38	0.16	0.0%	0.34	0.25	(0.09)	-26.0%	152.56	152.63	0.07	0.0%	0	1
0.8	152.39	152.58	0.19	0.0%	0.39	0.29	(0.10)	-26.0%	152.78	152.87	0.09	0.0%	0	3
0.9	152.57	152.78	0.21	0.0%	0.44	0.32	(0.12)	-27.0%	153.01	153.10	0.09	0.0%	0	2
1.0	152.74	152.98	0.24	0.0%	0.49	0.36	(0.13)	-27.0%	153.23	153.34	0.11	0.0%	0	11
2.0	154.48	154.95	0.47	0.0%	0.98	0.72	(0.26)	-27.0%	155.46	155.67	0.21	0.0%	0	41
3.0	156.22	156.93	0.71	0.0%	1.47	1.08	(0.39)	-27.0%	157.69	158.01	0.32	0.0%	1	19
4.0	157.96	158.91	0.95	1.0%	1.96	1.44	(0.52)	-27.0%	159.92	160.35	0.43	0.0%	0	18
5.0	159.70	160.88	1.18	1.0%	2.45	1.80	(0.65)	-27.0%	162.15	162.68	0.53	0.0%	1	24
6.0	161.45	162.86	1.41	1.0%	2.94	2.16	(0.78)	-27.0%	164.39	165.02	0.63	0.0%	0	18
7.0	163.19	164.83	1.64	1.0%	3.43	2.53	(0.90)	-26.0%	166.62	167.36	0.74	0.0%	0	12
8.0	164.93	166.81	1.88	1.0%	3.92	2.89	(1.03)	-26.0%	168.85	169.70	0.85	1.0%	0	11
9.0	166.67	168.79	2.12	1.0%	4.41	3.25	(1.16)	-26.0%	171.08	172.04	0.96	1.0%	0	15
10	168.41	170.76	2.35	1.0%	4.90	3.61	(1.29)	-26.0%	173.31	174.37	1.06	1.0%	0	13
15	177.11	180.64	3.53	2.0%	7.35	5.41	(1.94)	-26.0%	184.46	186.05	1.59	1.0%	1	42
20	185.82	190.53	4.71	3.0%	9.80	7.22	(2.58)	-26.0%	195.62	197.75	2.13	1.0%	2	52
25	194.52	200.41	5.89	3.0%	12.25	9.02	(3.23)	-26.0%	206.77	209.43	2.66	1.0%	0	60
30	203.23	210.29	7.06	3.0%	14.70	10.82	(3.88)	-26.0%	217.93	221.11	3.18	1.0%	2	38
35	211.93	220.17	8.24	4.0%	17.15	12.63	(4.52)	-26.0%	229.08	232.80	3.72	2.0%	1	25
40	220.63	230.05	9.42	4.0%	19.60	14.43	(5.17)	-26.0%	240.23	244.48	4.25	2.0%	2	24
45	229.34	239.93	10.59	5.0%	22.05	16.23	(5.82)	-26.0%	251.39	256.16	4.77	2.0%	1	21
50	238.04	249.82	11.78	5.0%	24.50	18.04	(6.46)	-26.0%	262.54	267.86	5.32	2.0%	1	24
100	325.09	348.63	23.54	7.0%	49.00	36.08	(12.92)	-26.0%	374.09	384.71	10.62	3.0%	20	179
150	412.13	447.45	35.32	9.0%	73.50	54.12	(19.38)	-26.0%	485.63	501.57	15.94	3.0%	45	101
200	499.17	546.27	47.10	9.0%	98.00	72.15	(25.85)	-26.0%	597.17	618.42	21.25	4.0%	76	49
300	673.26	743.90	70.64	10.0%	147.00	108.23	(38.77)	-26.0%	820.26	852.13	31.87	4.0%	208	50
400	847.34	941.53	94.19	11.0%	196.00	144.31	(51.69)	-26.0%	1,043.34	1,085.84	42.50	4.0%	135	15
500	1,021.43	1,139.17	117.74	12.0%	245.00	180.39	(64.61)	-26.0%	1,266.43	1,319.56	53.13	4.0%	100	19
1,000	1,891.86	2,127.33	235.47	12.0%	490.00	360.77	(129.23)	-26.0%	2,381.86	2,488.10	106.24	4.0%	237	18
2,000	3,632.72	4,103.67	470.95	13.0%	980.00	721.54	(258.46)	-26.0%	4,612.72	4,825.21	212.49	5.0%	114	15
3,000	5,373.57	6,080.00	706.43	13.0%	1,470.00	1,082.31	(387.69)	-26.0%	6,843.57	7,162.31	318.74	5.0%	26	4
4,000	7,114.43	8,056.33	941.90	13.0%	1,960.00	1,443.08	(516.92)	-26.0%	9,074.43	9,499.41	424.98	5.0%	6	2
5,000	8,855.29	10,032.67	1,177.38	13.0%	2,450.00	1,803.85	(646.15)	-26.0%	11,305.29	11,836.52	531.23	5.0%	8	1
6,000	10,596.15	12,009.00	1,412.85	13.0%	2,940.00	2,164.62	(775.38)	-26.0%	13,536.15	14,173.62	637.47	5.0%	0	0
7,000	12,337.00	13,985.33	1,648.33	13.0%	3,430.00	2,525.39	(904.61)	-26.0%	15,767.00	16,510.72	743.72	5.0%	0	0
7,500	13,207.43	14,973.50	1,766.07	13.0%	3,675.00	2,705.78	(969.22)	-26.0%	16,882.43	17,679.28	796.85	5.0%	7	1
10,000	17,559.58	19,914.33	2,354.75	13.0%	4,900.00	3,607.70	(1,292.30)	-26.0%	22,459.58	23,522.03	1,062.45	5.0%	2	0
20,000	34,968.15	39,677.67	4,709.52	13.0%	9,800.00	7,215.40	(2,584.60)	-26.0%	44,768.15	46,893.07	2,124.92	5.0%	1	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LCPA MMT

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage		Proposed	Bill Impact			Proposed	Bill Impact				Bill Impact	
Month	(Mcf)	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Proposed Rates	Amount	Percent
November	289	$ 654.11	$ 722.16	$ 68.05	10.0%	$ 141.61	$ 104.26	$ (37.35)	-26.0%	$ 795.72	$ 826.42	$ 30.70	4.0%
December	376	805.56	894.10	88.54	11.0%	184.24	135.65	(48.59)	-26.0%	989.80	1,029.75	39.95	4.0%
January	446	927.42	1,032.44	105.02	11.0%	218.54	160.90	(57.64)	-26.0%	1,145.96	1,193.34	47.38	4.0%
February	484	993.58	1,107.55	113.97	11.0%	237.16	174.61	(62.55)	-26.0%	1,230.74	1,282.16	51.42	4.0%
March	450	934.39	1,040.35	105.96	11.0%	220.50	162.35	(58.15)	-26.0%	1,154.89	1,202.70	47.81	4.0%
April	420	882.16	981.06	98.90	11.0%	205.80	151.52	(54.28)	-26.0%	1,087.96	1,132.58	44.62	4.0%
May	337	737.67	817.02	79.35	11.0%	165.13	121.58	(43.55)	-26.0%	902.80	938.60	35.80	4.0%
June	263	608.85	670.78	61.93	10.0%	128.87	94.88	(33.99)	-26.0%	737.72	765.66	27.94	4.0%
July	221	535.73	587.77	52.04	10.0%	108.29	79.73	(28.56)	-26.0%	644.02	667.50	23.48	4.0%
August	213	521.80	571.96	50.16	10.0%	104.37	76.84	(27.53)	-26.0%	626.17	648.80	22.63	4.0%
September	214	523.54	573.94	50.40	10.0%	104.86	77.20	(27.66)	-26.0%	628.40	651.14	22.74	4.0%
October	226	544.43	597.65	53.22	10.0%	110.74	81.53	(29.21)	-26.0%	655.17	679.18	24.01	4.0%
Total	3,939	$ 8,669.24	$ 9,596.78	$ 927.54	10.70%	$ 1,930.11	$ 1,421.05	$ (509.06)	-26.37%	$ 10,599.35	$ 11,017.83	$418.48	3.95%
Winter (Nov-Mar)	2,045	$ 4,315.06	$ 4,796.60	$ 481.54	11.16%	$ 1,002.05	$ 737.77	$ (264.28)	-26.37%	$ 5,317.11	$ 5,534.37	$217.26	4.09%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LCPA DMT

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	151.00	151.00	0.00	0.00%
Volumetric Distribution Charge	Per Mcf	1.6622	1.9763	0.31413	18.90%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
Rider E - Customer Education	Per Mcf	0.0000	0.0000	0.0000	0.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider I - OPEB	Per Mcf	0.0000	(0.1292)	(0.1292)	-100.00%
Total Gas Cost	Per Mcf	0.0000	(0.1292)	(0.1292)	0.00%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LCPA DMT

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact			
Mcf	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	January	July
0	158.15	151.00	(7.15)	-5.0%	0.00	0.00	0.00	0.0%	158.15	151.00	(7.15)	-5.0%	0	0
20	192.96	190.53	(2.43)	-1.0%	0.00	(2.58)	(2.58)	-100.00%	192.96	187.95	(5.01)	-3.0%	0	1
25	201.67	200.41	(1.26)	-1.0%	0.00	(3.23)	(3.23)	-100.00%	201.67	197.18	(4.49)	-2.0%	0	0
30	210.37	210.29	(0.08)	0.0%	0.00	(3.88)	(3.88)	-100.00%	210.37	206.41	(3.96)	-2.0%	0	0
35	219.08	220.17	1.09	0.0%	0.00	(4.52)	(4.52)	-100.00%	219.08	215.65	(3.43)	-2.0%	0	0
40	227.78	230.05	2.27	1.0%	0.00	(5.17)	(5.17)	-100.00%	227.78	224.88	(2.90)	-1.0%	0	0
45	236.48	239.93	3.45	1.0%	0.00	(5.82)	(5.82)	-100.00%	236.48	234.11	(2.37)	-1.0%	0	0
50	245.19	249.82	4.63	2.0%	0.00	(6.46)	(6.46)	-100.00%	245.19	243.36	(1.83)	-1.0%	0	0
100	332.23	348.63	16.40	5.0%	0.00	(12.92)	(12.92)	-100.00%	332.23	335.71	3.48	1.0%	1	0
150	419.27	447.45	28.18	7.0%	0.00	(19.38)	(19.38)	-100.00%	419.27	428.07	8.80	2.0%	0	0
200	506.32	546.27	39.95	8.0%	0.00	(25.85)	(25.85)	-100.00%	506.32	520.42	14.10	3.0%	0	1
300	680.40	743.90	63.50	9.0%	0.00	(38.77)	(38.77)	-100.00%	680.40	705.13	24.73	4.0%	0	0
400	854.49	941.53	87.04	10.0%	0.00	(51.69)	(51.69)	-100.00%	854.49	889.84	35.35	4.0%	0	0
500	1,028.57	1,139.17	110.60	11.0%	0.00	(64.62)	(64.62)	-100.00%	1,028.57	1,074.55	45.98	4.0%	0	0
1,000	1,899.00	2,127.33	228.33	12.0%	0.00	(129.23)	(129.23)	-100.00%	1,899.00	1,998.10	99.10	5.0%	1	1
2,000	3,639.86	4,103.67	463.81	13.0%	0.00	(258.46)	(258.46)	-100.00%	3,639.86	3,845.21	205.35	6.0%	3	5
3,000	5,380.72	6,080.00	699.28	13.0%	0.00	(387.69)	(387.69)	-100.00%	5,380.72	5,692.31	311.59	6.0%	1	0
4,000	7,121.58	8,056.33	934.75	13.0%	0.00	(516.92)	(516.92)	-100.00%	7,121.58	7,539.41	417.83	6.0%	1	1
5,000	8,862.43	10,032.67	1,170.24	13.0%	0.00	(646.15)	(646.15)	-100.00%	8,862.43	9,386.52	524.09	6.0%	1	0
6,000	10,603.29	12,009.00	1,405.71	13.0%	0.00	(775.38)	(775.38)	-100.00%	10,603.29	11,233.62	630.33	6.0%	0	0
7,000	12,344.15	13,985.33	1,641.18	13.0%	0.00	(904.61)	(904.61)	-100.00%	12,344.15	13,080.72	736.57	6.0%	0	0
7,500	13,214.58	14,973.50	1,758.92	13.0%	0.00	(969.23)	(969.23)	-100.00%	13,214.58	14,004.27	789.69	6.0%	1	2
10,000	17,566.72	19,914.33	2,347.61	13.0%	0.00	(1,292.30)	(1,292.30)	-100.00%	17,566.72	18,622.03	1,055.31	6.0%	1	2
20,000	34,975.30	39,677.67	4,702.37	13.0%	0.00	(2,584.60)	(2,584.60)	-100.00%	34,975.30	37,093.07	2,117.77	6.0%	5	1

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LCPA DMT

Annual Bill Impact															
		Delivery				Commodity				Total					
	Usage		Proposed	Bill Impact			Proposed	Bill Impact					Bill Impact		
Month	(Mcf)	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Proposed Rates	Amount	Percent		
November	6,145	$ 10,855.72	$ 12,295.57	$ 1,439.85	13.0%	$ -	$ (794.12)	$ (794.12)	0.0%	$ 10,855.72	$ 11,501.45	$ 645.73	6.0%		
December	6,281	11,092.47	12,564.35	1,471.88	13.0%	-	(811.69)	(811.69)	-100.0%	11,092.47	11,752.66	660.19	6.0%		
January	6,589	11,628.66	13,173.06	1,544.40	13.0%	-	(851.50)	(851.50)	-100.0%	11,628.66	12,321.56	692.90	6.0%		
February	6,509	11,489.39	13,014.95	1,525.56	13.0%	-	(841.16)	(841.16)	-100.0%	11,489.39	12,173.79	684.40	6.0%		
March	6,659	11,750.52	13,311.40	1,560.88	13.0%	-	(860.54)	(860.54)	-100.0%	11,750.52	12,450.86	700.34	6.0%		
April	6,086	10,753.01	12,178.96	1,425.95	13.0%	-	(786.49)	(786.49)	-100.0%	10,753.01	11,392.47	639.46	6.0%		
May	5,738	10,147.19	11,491.20	1,344.01	13.0%	-	(741.52)	(741.52)	-100.0%	10,147.19	10,749.68	602.49	6.0%		
June	4,975	8,818.91	9,983.26	1,164.35	13.0%	-	(642.92)	(642.92)	-100.0%	8,818.91	9,340.34	521.43	6.0%		
July	5,224	9,252.39	10,475.36	1,222.97	13.0%	-	(675.10)	(675.10)	-100.0%	9,252.39	9,800.26	547.87	6.0%		
August	5,807	10,267.31	11,627.57	1,360.26	13.0%	-	(750.44)	(750.44)	-100.0%	10,267.31	10,877.13	609.82	6.0%		
September	5,498	9,729.38	11,016.88	1,287.50	13.0%	-	(710.51)	(710.51)	-100.0%	9,729.38	10,306.37	576.99	6.0%		
October	5,470	9,680.64	10,961.54	1,280.90	13.0%	-	(706.89)	(706.89)	-100.0%	9,680.64	10,254.65	574.01	6.0%		
Total	70,981	$ 125,465.59	$ 142,094.10	$ 16,628.51	13.25%	$ -	$ (9,172.88)	$ (9,172.88)	-100.00%	$ 125,465.59	$ 132,921.22	$7,455.63	5.94%		
Winter (Nov-Mar)	32,183	$ 56,816.76	$ 64,359.33	$ 7,542.57	13.28%	$ -	$ (4,159.01)	$ (4,159.01)	-100.00%	$ 56,816.76	$ 60,200.32	$3,383.56	5.96%		

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
NGV

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Volumetric Distribution Charge	Per Mcf	1.7896	2.1705	0.3809	21.28%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider A - Distribution Charge	Per Mcf	0.4453	0.4453	0.0000	0.00%
Rider A - Natural Gas Supply Charge	Per Mcf	5.0334	5.0334	0.0000	0.00%
Rider A - Gas Adjustment Charge	Per Mcf	0.2036	0.2036	0.0000	0.00%
Total Gas Cost	Per Mcf	5.6823	5.6823	0.0000	0.00%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
NGV

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
	Current	Proposed	Bill Impact		Current	Proposed	Bill Impact		Current	Proposed	Bill Impact			
Mcf	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	Rates	Rates	Amount	Percent	January	July
0	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%	0.00	0.00	0.00	0.0%	0	0
15	28.11	32.56	4.45	16.0%	85.23	85.23	0.00	0.0%	113.34	117.79	4.45	4.0%	1	1
30	56.23	65.11	8.88	16.0%	170.47	170.47	0.00	0.0%	226.70	235.58	8.88	4.0%	0	0
50	93.71	108.52	14.81	16.0%	284.12	284.12	0.00	0.0%	377.83	392.64	14.81	4.0%	0	0
100	187.43	217.05	29.62	16.0%	568.23	568.23	0.00	0.0%	755.66	785.28	29.62	4.0%	0	0
150	281.14	325.57	44.43	16.0%	852.35	852.35	0.00	0.0%	1,133.49	1,177.92	44.43	4.0%	0	0
200	374.86	434.10	59.24	16.0%	1,136.46	1,136.46	0.00	0.0%	1,511.32	1,570.56	59.24	4.0%	0	0
300	562.29	651.14	88.85	16.0%	1,704.69	1,704.69	0.00	0.0%	2,266.98	2,355.83	88.85	4.0%	1	1
400	749.71	868.19	118.48	16.0%	2,272.92	2,272.92	0.00	0.0%	3,022.63	3,141.11	118.48	4.0%	1	0
500	937.14	1,085.24	148.10	16.0%	2,841.15	2,841.15	0.00	0.0%	3,778.29	3,926.39	148.10	4.0%	1	2
1,000	1,874.29	2,170.48	296.19	16.0%	5,682.30	5,682.30	0.00	0.0%	7,556.59	7,852.78	296.19	4.0%	0	0
2,000	3,748.57	4,340.96	592.39	16.0%	11,364.60	11,364.60	0.00	0.0%	15,113.17	15,705.56	592.39	4.0%	1	1
3,000	5,622.86	6,511.44	888.58	16.0%	17,046.90	17,046.90	0.00	0.0%	22,669.76	23,558.34	888.58	4.0%	1	1
4,000	7,497.15	8,681.92	1,184.77	16.0%	22,729.20	22,729.20	0.00	0.0%	30,226.35	31,411.12	1,184.77	4.0%	0	0
5,000	9,371.43	10,852.40	1,480.97	16.0%	28,411.50	28,411.50	0.00	0.0%	37,782.93	39,263.90	1,480.97	4.0%	1	1

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
NGV

Annual Bill Impact															
		Delivery				Commodity				Total					
	Usage		Proposed	Bill Impact			Proposed	Bill Impact					Bill Impact		
Month	(Mcf)	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Proposed Rates	Amount	Percent		
November	698	$ 1,308.25	$ 1,515.00	$ 206.75	16.0%	$ 3,966.25	$ 3,966.25	$ -	0.0%	$ 5,274.50	$ 5,481.25	$ 206.75	4.0%		
December	1,417	2,655.86	3,075.57	419.71	16.0%	8,051.82	8,051.82	-	0.0%	10,707.68	11,127.39	419.71	4.0%		
January	1,857	3,480.55	4,030.58	550.03	16.0%	10,552.03	10,552.03	-	0.0%	14,032.58	14,582.61	550.03	4.0%		
February	1,782	3,339.98	3,867.80	527.82	16.0%	10,125.86	10,125.86	-	0.0%	13,465.84	13,993.66	527.82	4.0%		
March	1,518	2,845.17	3,294.79	449.62	16.0%	8,625.73	8,625.73	-	0.0%	11,470.90	11,920.52	449.62	4.0%		
April	1,231	2,307.25	2,671.86	364.61	16.0%	6,994.91	6,994.91	-	0.0%	9,302.16	9,666.77	364.61	4.0%		
May	735	1,377.60	1,595.30	217.70	16.0%	4,176.49	4,176.49	-	0.0%	5,554.09	5,771.79	217.70	4.0%		
June	242	453.58	525.26	71.68	16.0%	1,375.12	1,375.12	-	0.0%	1,828.70	1,900.38	71.68	4.0%		
July	96	179.93	208.37	28.44	16.0%	545.50	545.50	-	0.0%	725.43	753.87	28.44	4.0%		
August	63	118.08	136.74	18.66	16.0%	357.98	357.98	-	0.0%	476.06	494.72	18.66	4.0%		
September	84	157.44	182.32	24.88	16.0%	477.31	477.31	-	0.0%	634.75	659.63	24.88	4.0%		
October	282	528.55	612.08	83.53	16.0%	1,602.41	1,602.41	-	0.0%	2,130.96	2,214.49	83.53	4.0%		
Total	10,005	$ 18,752.24	$ 21,715.67	$ 2,963.43	15.80%	$ 56,851.41	$ 56,851.41	$ -	0.00%	$ 75,603.65	$ 78,567.08	$2,963.43	3.92%		
Winter (Nov-Mar)	7,272	$ 13,629.81	$ 15,783.74	$ 2,153.93	15.80%	$ 41,321.69	$ 41,321.69	$ -	0.00%	$ 54,951.50	$ 57,105.43	$2,153.93	3.92%		

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SVIS Sales

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	82.00	82.00	0.00	0.00%
Volumetric Distribution Charge	Per Mcf	2.0722	2.6703	0.5981	28.86%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
Rider E - Customer Education	Per Mcf	0.0000	0.0000	0.0000	0.00%
Rider G - Merchant Function Charge	Per Mcf	0.0178	0.0217	0.0039	21.74%
Rider H - Gas Procurement Charge	Per Mcf	0.1149	0.1149	0.0000	0.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider A - Distribution Charge	Per Mcf	0.4453	0.4453	0.0000	0.00%
Rider A - Natural Gas Supply Charge	Per Mcf	5.0334	5.0334	0.0000	0.00%
Rider A - Gas Adjustment Charge	Per Mcf	0.2036	0.2036	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.0673)	(0.0673)	-100.00%
Total Gas Cost	Per Mcf	5.6823	5.6150	(0.0673)	-1.18%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SVIS Sales

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
Mcf	Current Rates	Proposed Rates	Bill Impact Amount	Bill Impact Percent	Current Rates	Proposed Rates	Bill Impact Amount	Bill Impact Percent	Current Rates	Proposed Rates	Bill Impact Amount	Bill Impact Percent	January	July
0.0	85.88	82.00	(3.88)	-5.0%	0.00	0.00	0.00	0.0%	85.88	82.00	(3.88)	-5.0%	6	35
0.1	86.11	82.28	(3.83)	-4.0%	0.57	0.56	(0.01)	-2.0%	86.68	82.84	(3.84)	-4.0%	0	6
0.2	86.34	82.56	(3.78)	-4.0%	1.14	1.12	(0.02)	-2.0%	87.48	83.68	(3.80)	-4.0%	1	1
0.3	86.57	82.84	(3.73)	-4.0%	1.70	1.68	(0.02)	-1.0%	88.27	84.52	(3.75)	-4.0%	0	0
0.4	86.80	83.12	(3.68)	-4.0%	2.27	2.25	(0.02)	-1.0%	89.07	85.37	(3.70)	-4.0%	1	3
0.5	87.03	83.40	(3.63)	-4.0%	2.84	2.81	(0.03)	-1.0%	89.87	86.21	(3.66)	-4.0%	0	6
0.6	87.27	83.68	(3.59)	-4.0%	3.41	3.37	(0.04)	-1.0%	90.68	87.05	(3.63)	-4.0%	1	4
0.7	87.50	83.96	(3.54)	-4.0%	3.98	3.93	(0.05)	-1.0%	91.48	87.89	(3.59)	-4.0%	0	3
0.8	87.73	84.25	(3.48)	-4.0%	4.55	4.49	(0.06)	-1.0%	92.28	88.74	(3.54)	-4.0%	0	3
0.9	87.96	84.53	(3.43)	-4.0%	5.11	5.05	(0.06)	-1.0%	93.07	89.58	(3.49)	-4.0%	0	2
1.0	88.19	84.81	(3.38)	-4.0%	5.68	5.62	(0.06)	-1.0%	93.87	90.43	(3.44)	-4.0%	0	7
2.0	90.50	87.61	(2.89)	-3.0%	11.36	11.23	(0.13)	-1.0%	101.86	98.84	(3.02)	-3.0%	1	9
3.0	92.81	90.42	(2.39)	-3.0%	17.05	16.85	(0.20)	-1.0%	109.86	107.27	(2.59)	-2.0%	0	9
4.0	95.12	93.23	(1.89)	-2.0%	22.73	22.46	(0.27)	-1.0%	117.85	115.69	(2.16)	-2.0%	0	7
5.0	97.43	96.03	(1.40)	-1.0%	28.41	28.08	(0.33)	-1.0%	125.84	124.11	(1.73)	-1.0%	0	2
6.0	99.74	98.84	(0.90)	-1.0%	34.09	33.69	(0.40)	-1.0%	133.83	132.53	(1.30)	-1.0%	0	4
7.0	102.05	101.65	(0.40)	0.0%	39.78	39.31	(0.47)	-1.0%	141.83	140.96	(0.87)	-1.0%	0	3
8.0	104.35	104.45	0.10	0.0%	45.46	44.92	(0.54)	-1.0%	149.81	149.37	(0.44)	0.0%	0	0
9.0	106.66	107.26	0.60	1.0%	51.14	50.54	(0.60)	-1.0%	157.80	157.80	0.00	0.0%	1	4
10	108.97	110.07	1.10	1.0%	56.82	56.15	(0.67)	-1.0%	165.79	166.22	0.43	0.0%	0	0
15	120.52	124.10	3.58	3.0%	85.23	84.23	(1.00)	-1.0%	205.75	208.33	2.58	1.0%	5	6
20	132.07	138.14	6.07	5.0%	113.65	112.30	(1.35)	-1.0%	245.72	250.44	4.72	2.0%	2	1
25	143.61	152.17	8.56	6.0%	142.06	140.38	(1.68)	-1.0%	285.67	292.55	6.88	2.0%	6	2
30	155.16	166.21	11.05	7.0%	170.47	168.45	(2.02)	-1.0%	325.63	334.66	9.03	3.0%	3	0
35	166.70	180.24	13.54	8.0%	198.88	196.53	(2.35)	-1.0%	365.58	376.77	11.19	3.0%	7	3
40	178.25	194.27	16.02	9.0%	227.29	224.60	(2.69)	-1.0%	405.54	418.87	13.33	3.0%	4	0
45	189.80	208.31	18.51	10.0%	255.70	252.68	(3.02)	-1.0%	445.50	460.99	15.49	3.0%	3	1
50	201.34	222.34	21.00	10.0%	284.12	280.75	(3.37)	-1.0%	485.46	503.09	17.63	4.0%	4	2
100	316.80	362.68	45.88	14.0%	568.23	561.50	(6.73)	-1.0%	885.03	924.18	39.15	4.0%	24	1
150	432.27	503.03	70.76	16.0%	852.35	842.25	(10.10)	-1.0%	1,284.62	1,345.28	60.66	5.0%	19	0
200	547.73	643.37	95.64	17.0%	1,136.46	1,123.00	(13.46)	-1.0%	1,684.19	1,766.37	82.18	5.0%	18	0
300	778.65	924.05	145.40	19.0%	1,704.69	1,684.50	(20.19)	-1.0%	2,483.34	2,608.55	125.21	5.0%	14	0
400	1,009.57	1,204.74	195.17	19.0%	2,272.92	2,246.00	(26.92)	-1.0%	3,282.49	3,450.74	168.25	5.0%	2	0
500	1,240.50	1,485.42	244.92	20.0%	2,841.15	2,807.51	(33.64)	-1.0%	4,081.65	4,292.93	211.28	5.0%	2	0
1,000	2,395.11	2,888.85	493.74	21.0%	5,682.30	5,615.01	(67.29)	-1.0%	8,077.41	8,503.86	426.45	5.0%	1	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SVIS Sales

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage		Proposed	Bill Impact			Proposed	Bill Impact			Proposed	Bill Impact	
Month	(Mcf)	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent
November	23	$ 138.99	$ 146.56	$ 7.57	5.0%	$ 130.69	$ 129.15	$ (1.54)	-1.0%	$ 269.68	$ 275.71	$ 6.03	2.0%
December	65	235.98	264.45	28.47	12.0%	369.35	364.98	(4.37)	-1.0%	605.33	629.43	24.10	4.0%
January	92	298.33	340.23	41.90	14.0%	522.77	516.58	(6.19)	-1.0%	821.10	856.81	35.71	4.0%
February	102	321.42	368.30	46.88	15.0%	579.59	572.73	(6.86)	-1.0%	901.01	941.03	40.02	4.0%
March	77	263.69	298.13	34.44	13.0%	437.54	432.36	(5.18)	-1.0%	701.23	730.49	29.26	4.0%
April	53	208.27	230.76	22.49	11.0%	301.16	297.60	(3.56)	-1.0%	509.43	528.36	18.93	4.0%
May	27	148.23	157.78	9.55	6.0%	153.42	151.61	(1.81)	-1.0%	301.65	309.39	7.74	3.0%
June	10	108.97	110.07	1.10	1.0%	56.82	56.15	(0.67)	-1.0%	165.79	166.22	0.43	0.0%
July	5	97.43	96.03	(1.40)	-1.0%	28.41	28.08	(0.33)	-1.0%	125.84	124.11	(1.73)	-1.0%
August	2	90.50	87.61	(2.89)	-3.0%	11.36	11.23	(0.13)	-1.0%	101.86	98.84	(3.02)	-3.0%
September	5	97.43	96.03	(1.40)	-1.0%	28.41	28.08	(0.33)	-1.0%	125.84	124.11	(1.73)	-1.0%
October	6	99.74	98.84	(0.90)	-1.0%	34.09	33.69	(0.40)	-1.0%	133.83	132.53	(1.30)	-1.0%
Total	467	$ 2,108.98	$ 2,294.79	$ 185.81	8.81%	$ 2,653.61	$ 2,622.24	$ (31.37)	-1.18%	$ 4,762.59	$ 4,917.03	$154.44	3.24%
Winter (Nov-Mar)	359	$ 1,258.41	$ 1,417.67	$ 159.26	12.66%	$ 2,039.94	$ 2,015.80	$ (24.14)	-1.18%	$ 3,298.35	$ 3,433.47	$135.12	4.10%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SVIS SATC

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	82.00	82.00	0.00	0.00%
Volumetric Distribution Charge	Per Mcf	2.0722	2.6703	0.5981	28.86%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
Rider E - Customer Education	Per Mcf	0.0000	0.0000	0.0000	0.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider A - Distribution Charge	Per Mcf	0.4453	0.4453	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.0673)	(0.0673)	-100.00%
Total Gas Cost	Per Mcf	0.4453	0.3780	(0.0673)	-15.11%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SVIS SATC

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
	Current Rates	Proposed Rates	Bill Impact		Current Rates	Proposed Rates	Bill Impact		Current Rates	Proposed Rates	Bill Impact			
Mcf			Amount	Percent			Amount	Percent			Amount	Percent	January	July
0.0	85.88	82.00	(3.88)	-5.0%	0.00	0.00	0.00	0.0%	85.88	82.00	(3.88)	-5.0%	0	0
0.1	86.10	82.27	(3.83)	-4.0%	0.04	0.04	0.00	0.0%	86.14	82.31	(3.83)	-4.0%	0	0
0.2	86.31	82.53	(3.78)	-4.0%	0.09	0.08	(0.01)	-11.0%	86.40	82.61	(3.79)	-4.0%	0	2
0.3	86.53	82.80	(3.73)	-4.0%	0.13	0.11	(0.02)	-15.0%	86.66	82.91	(3.75)	-4.0%	0	1
0.4	86.75	83.07	(3.68)	-4.0%	0.18	0.15	(0.03)	-17.0%	86.93	83.22	(3.71)	-4.0%	0	0
0.5	86.97	83.34	(3.63)	-4.0%	0.22	0.19	(0.03)	-14.0%	87.19	83.53	(3.66)	-4.0%	0	0
0.6	87.18	83.60	(3.58)	-4.0%	0.27	0.23	(0.04)	-15.0%	87.45	83.83	(3.62)	-4.0%	0	0
0.7	87.40	83.87	(3.53)	-4.0%	0.31	0.26	(0.05)	-16.0%	87.71	84.13	(3.58)	-4.0%	0	0
0.8	87.62	84.14	(3.48)	-4.0%	0.36	0.30	(0.06)	-17.0%	87.98	84.44	(3.54)	-4.0%	0	0
0.9	87.83	84.40	(3.43)	-4.0%	0.40	0.34	(0.06)	-15.0%	88.23	84.74	(3.49)	-4.0%	0	0
1.0	88.05	84.67	(3.38)	-4.0%	0.45	0.38	(0.07)	-16.0%	88.50	85.05	(3.45)	-4.0%	0	1
2.0	90.22	87.34	(2.88)	-3.0%	0.89	0.76	(0.13)	-15.0%	91.11	88.10	(3.01)	-3.0%	0	2
3.0	92.39	90.01	(2.38)	-3.0%	1.34	1.13	(0.21)	-16.0%	93.73	91.14	(2.59)	-3.0%	0	1
4.0	94.56	92.68	(1.88)	-2.0%	1.78	1.51	(0.27)	-15.0%	96.34	94.19	(2.15)	-2.0%	0	1
5.0	96.73	95.35	(1.38)	-1.0%	2.23	1.89	(0.34)	-15.0%	98.96	97.24	(1.72)	-2.0%	0	1
6.0	98.90	98.02	(0.88)	-1.0%	2.67	2.27	(0.40)	-15.0%	101.57	100.29	(1.28)	-1.0%	0	0
7.0	101.07	100.69	(0.38)	0.0%	3.12	2.65	(0.47)	-15.0%	104.19	103.34	(0.85)	-1.0%	0	0
8.0	103.24	103.36	0.12	0.0%	3.56	3.02	(0.54)	-15.0%	106.80	106.38	(0.42)	0.0%	0	0
9.0	105.41	106.03	0.62	1.0%	4.01	3.40	(0.61)	-15.0%	109.42	109.43	0.01	0.0%	0	0
10	107.58	108.70	1.12	1.0%	4.45	3.78	(0.67)	-15.0%	112.03	112.48	0.45	0.0%	0	0
15	118.43	122.05	3.62	3.0%	6.68	5.67	(1.01)	-15.0%	125.11	127.72	2.61	2.0%	1	2
20	129.29	135.41	6.12	5.0%	8.91	7.56	(1.35)	-15.0%	138.20	142.97	4.77	3.0%	0	0
25	140.14	148.76	8.62	6.0%	11.13	9.45	(1.68)	-15.0%	151.27	158.21	6.94	5.0%	1	0
30	150.99	162.11	11.12	7.0%	13.36	11.34	(2.02)	-15.0%	164.35	173.45	9.10	6.0%	2	0
35	161.84	175.46	13.62	8.0%	15.59	13.23	(2.36)	-15.0%	177.43	188.69	11.26	6.0%	0	0
40	172.69	188.81	16.12	9.0%	17.81	15.12	(2.69)	-15.0%	190.50	203.93	13.43	7.0%	0	0
45	183.54	202.16	18.62	10.0%	20.04	17.01	(3.03)	-15.0%	203.58	219.17	15.59	8.0%	0	0
50	194.39	215.51	21.12	11.0%	22.27	18.90	(3.37)	-15.0%	216.66	234.41	17.75	8.0%	0	0
100	302.91	349.03	46.12	15.0%	44.53	37.80	(6.73)	-15.0%	347.44	386.83	39.39	11.0%	2	0
150	411.42	482.54	71.12	17.0%	66.80	56.70	(10.10)	-15.0%	478.22	539.24	61.02	13.0%	3	0
200	519.93	616.06	96.13	18.0%	89.06	75.60	(13.46)	-15.0%	608.99	691.66	82.67	14.0%	1	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SVIS SATC

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage		Proposed	Bill Impact			Proposed	Bill Impact			Proposed	Bill Impact	
Month	(Mcf)	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent
November	21	$ 131.46	$ 138.08	$ 6.62	5.0%	$ 9.35	$ 7.94	$ (1.41)	-15.0%	$ 140.81	$ 146.02	$ 5.21	4.0%
December	59	213.93	239.55	25.62	12.0%	26.27	22.30	(3.97)	-15.0%	240.20	261.85	21.65	9.0%
January	90	281.20	322.33	41.13	15.0%	40.08	34.02	(6.06)	-15.0%	321.28	356.35	35.07	11.0%
February	102	307.25	354.37	47.12	15.0%	45.42	38.56	(6.86)	-15.0%	352.67	392.93	40.26	11.0%
March	77	252.99	287.61	34.62	14.0%	34.29	29.11	(5.18)	-15.0%	287.28	316.72	29.44	10.0%
April	54	203.07	226.20	23.13	11.0%	24.05	20.41	(3.64)	-15.0%	227.12	246.61	19.49	9.0%
May	23	135.80	143.42	7.62	6.0%	10.24	8.69	(1.55)	-15.0%	146.04	152.11	6.07	4.0%
June	10	107.58	108.70	1.12	1.0%	4.45	3.78	(0.67)	-15.0%	112.03	112.48	0.45	0.0%
July	2	90.22	87.34	(2.88)	-3.0%	0.89	0.76	(0.13)	-15.0%	91.11	88.10	(3.01)	-3.0%
August	1	88.05	84.67	(3.38)	-4.0%	0.45	0.38	(0.07)	-16.0%	88.50	85.05	(3.45)	-4.0%
September	3	92.39	90.01	(2.38)	-3.0%	1.34	1.13	(0.21)	-16.0%	93.73	91.14	(2.59)	-3.0%
October	4	94.56	92.68	(1.88)	-2.0%	1.78	1.51	(0.27)	-15.0%	96.34	94.19	(2.15)	-2.0%
Total	446	$ 1,998.50	$ 2,174.96	$ 176.46	8.83%	$ 198.61	$ 168.59	$ (30.02)	-15.12%	$ 2,197.11	$ 2,343.55	$146.44	6.67%
Winter (Nov-Mar)	349	$ 1,186.83	$ 1,341.94	$ 155.11	13.07%	$ 155.41	$ 131.93	$ (23.48)	-15.11%	$ 1,342.24	$ 1,473.87	$131.63	9.81%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SVIS MMT

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	82.00	82.00	0.00	0.00%
Volumetric Distribution Charge	Per Mcf	2.0722	2.6703	0.5981	28.86%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
MMT Gas Cost Charge	Per Mcf	0.4900	0.4900	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.0227)	(0.0227)	-100.00%
Total Gas Cost	Per Mcf	0.4900	0.4673	(0.0227)	-4.62%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SVIS MMT

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
			Bill Impact			Proposed	Bill Impact			Proposed	Bill Impact			
Mcf	Current Rates	Proposed Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	January	July
0.0	82.00	82.00	0.00	0.0%	0.00	0.00	0.00	0.0%	82.00	82.00	0.00	0.0%	1	18
0.1	82.22	82.27	0.05	0.0%	0.05	0.05	0.00	0.0%	82.27	82.32	0.05	0.0%	0	4
0.2	82.43	82.53	0.10	0.0%	0.10	0.09	(0.01)	-10.0%	82.53	82.62	0.09	0.0%	0	1
0.3	82.65	82.80	0.15	0.0%	0.15	0.14	(0.01)	-7.0%	82.80	82.94	0.14	0.0%	0	2
0.4	82.87	83.07	0.20	0.0%	0.20	0.19	(0.01)	-5.0%	83.07	83.26	0.19	0.0%	0	0
0.5	83.09	83.34	0.25	0.0%	0.25	0.23	(0.02)	-8.0%	83.34	83.57	0.23	0.0%	0	1
0.6	83.30	83.60	0.30	0.0%	0.29	0.28	(0.01)	-3.0%	83.59	83.88	0.29	0.0%	0	1
0.7	83.52	83.87	0.35	0.0%	0.34	0.33	(0.01)	-3.0%	83.86	84.20	0.34	0.0%	0	1
0.8	83.74	84.14	0.40	0.0%	0.39	0.37	(0.02)	-5.0%	84.13	84.51	0.38	0.0%	0	1
0.9	83.95	84.40	0.45	1.0%	0.44	0.42	(0.02)	-5.0%	84.39	84.82	0.43	1.0%	0	1
1.0	84.17	84.67	0.50	1.0%	0.49	0.47	(0.02)	-4.0%	84.66	85.14	0.48	1.0%	0	6
2.0	86.34	87.34	1.00	1.0%	0.98	0.93	(0.05)	-5.0%	87.32	88.27	0.95	1.0%	0	9
3.0	88.51	90.01	1.50	2.0%	1.47	1.40	(0.07)	-5.0%	89.98	91.41	1.43	2.0%	0	1
4.0	90.68	92.68	2.00	2.0%	1.96	1.87	(0.09)	-5.0%	92.64	94.55	1.91	2.0%	0	4
5.0	92.85	95.35	2.50	3.0%	2.45	2.34	(0.11)	-4.0%	95.30	97.69	2.39	3.0%	0	0
6.0	95.02	98.02	3.00	3.0%	2.94	2.80	(0.14)	-5.0%	97.96	100.82	2.86	3.0%	0	2
7.0	97.19	100.69	3.50	4.0%	3.43	3.27	(0.16)	-5.0%	100.62	103.96	3.34	3.0%	0	1
8.0	99.36	103.36	4.00	4.0%	3.92	3.74	(0.18)	-5.0%	103.28	107.10	3.82	4.0%	0	0
9.0	101.53	106.03	4.50	4.0%	4.41	4.21	(0.20)	-5.0%	105.94	110.24	4.30	4.0%	0	1
10	103.70	108.70	5.00	5.0%	4.90	4.67	(0.23)	-5.0%	108.60	113.37	4.77	4.0%	0	1
15	114.55	122.05	7.50	7.0%	7.35	7.01	(0.34)	-5.0%	121.90	129.06	7.16	6.0%	2	1
20	125.41	135.41	10.00	8.0%	9.80	9.35	(0.45)	-5.0%	135.21	144.76	9.55	7.0%	0	2
25	136.26	148.76	12.50	9.0%	12.25	11.68	(0.57)	-5.0%	148.51	160.44	11.93	8.0%	0	1
30	147.11	162.11	15.00	10.0%	14.70	14.02	(0.68)	-5.0%	161.81	176.13	14.32	9.0%	1	1
35	157.96	175.46	17.50	11.0%	17.15	16.36	(0.79)	-5.0%	175.11	191.82	16.71	10.0%	0	1
40	168.81	188.81	20.00	12.0%	19.60	18.69	(0.91)	-5.0%	188.41	207.50	19.09	10.0%	2	0
45	179.66	202.16	22.50	13.0%	22.05	21.03	(1.02)	-5.0%	201.71	223.19	21.48	11.0%	1	0
50	190.51	215.51	25.00	13.0%	24.50	23.37	(1.13)	-5.0%	215.01	238.88	23.87	11.0%	0	0
100	299.03	349.03	50.00	17.0%	49.00	46.73	(2.27)	-5.0%	348.03	395.76	47.73	14.0%	18	2
150	407.54	482.54	75.00	18.0%	73.50	70.10	(3.40)	-5.0%	481.04	552.64	71.60	15.0%	18	0
200	516.05	616.06	100.01	19.0%	98.00	93.47	(4.53)	-5.0%	614.05	709.53	95.48	16.0%	10	0
300	733.08	883.08	150.00	20.0%	147.00	140.20	(6.80)	-5.0%	880.08	1,023.28	143.20	16.0%	7	0
400	950.10	1,150.11	200.01	21.0%	196.00	186.94	(9.06)	-5.0%	1,146.10	1,337.05	190.95	17.0%	3	0
500	1,167.13	1,417.14	250.01	21.0%	245.00	233.67	(11.33)	-5.0%	1,412.13	1,650.81	238.68	17.0%	1	0
1,000	2,252.26	2,752.28	500.02	22.0%	490.00	467.34	(22.66)	-5.0%	2,742.26	3,219.62	477.36	17.0%	0	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
SVIS MMT

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage		Proposed	Bill Impact			Proposed	Bill Impact			Proposed	Bill Impact	
Month	(Mcf)	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent
November	37	$ 162.30	$ 180.80	$ 18.50	11.0%	$ 18.13	$ 17.29	$ (0.84)	-5.0%	$ 180.43	$ 198.09	$ 17.66	10.0%
December	82	259.96	300.96	41.00	16.0%	40.18	38.32	(1.86)	-5.0%	300.14	339.28	39.14	13.0%
January	119	340.26	399.76	59.50	17.0%	58.31	55.61	(2.70)	-5.0%	398.57	455.37	56.80	14.0%
February	130	364.13	429.14	65.01	18.0%	63.70	60.75	(2.95)	-5.0%	427.83	489.89	62.06	15.0%
March	100	299.03	349.03	50.00	17.0%	49.00	46.73	(2.27)	-5.0%	348.03	395.76	47.73	14.0%
April	67	227.41	260.91	33.50	15.0%	32.83	31.31	(1.52)	-5.0%	260.24	292.22	31.98	12.0%
May	32	151.45	167.45	16.00	11.0%	15.68	14.95	(0.73)	-5.0%	167.13	182.40	15.27	9.0%
June	11	105.87	111.37	5.50	5.0%	5.39	5.14	(0.25)	-5.0%	111.26	116.51	5.25	5.0%
July	5	92.85	95.35	2.50	3.0%	2.45	2.34	(0.11)	-4.0%	95.30	97.69	2.39	3.0%
August	4	90.68	92.68	2.00	2.0%	1.96	1.87	(0.09)	-5.0%	92.64	94.55	1.91	2.0%
September	5	92.85	95.35	2.50	3.0%	2.45	2.34	(0.11)	-4.0%	95.30	97.69	2.39	3.0%
October	10	103.70	108.70	5.00	5.0%	4.90	4.67	(0.23)	-5.0%	108.60	113.37	4.77	4.0%
Total	602	$ 2,290.49	$ 2,591.50	$ 301.01	13.14%	$ 294.98	$ 281.32	$ (13.66)	-4.63%	$ 2,585.47	$ 2,872.82	$287.35	11.11%
Winter (Nov-Mar)	468	$ 1,425.68	$ 1,659.69	$ 234.01	16.41%	$ 229.32	$ 218.70	$ (10.62)	-4.63%	$ 1,655.00	$ 1,878.39	$223.39	13.50%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
IVIS Sales

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	252.00	252.00	0.00	0.00%
Volumetric Distribution Charge	Per Mcf	1.3347	1.5798	0.2451	18.36%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
Rider E - Customer Education	Per Mcf	0.0000	0.0000	0.0000	0.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider A - Distribution Charge	Per Mcf	0.4453	0.4453	0.0000	0.00%
Rider A - Natural Gas Supply Charge	Per Mcf	5.0334	5.0334	0.0000	0.00%
Rider A - Gas Adjustment Charge	Per Mcf	0.2036	0.2036	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.1507)	(0.1507)	-100.00%
Total Gas Cost	Per Mcf	5.6823	5.5316	(0.1507)	-2.65%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
IVIS Sales

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
			Bill Impact			Proposed	Bill Impact			Proposed	Bill Impact			
Mcf	Current Rates	Proposed Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	January	July
0.0	263.93	252.00	(11.93)	-5.0%	0.00	0.00	0.00	0.0%	263.93	252.00	(11.93)	-5.0%	1	5
0.1	264.06	252.16	(11.90)	-5.0%	0.57	0.55	(0.02)	-4.0%	264.63	252.71	(11.92)	-5.0%	0	1
0.2	264.20	252.32	(11.88)	-4.0%	1.14	1.11	(0.03)	-3.0%	265.34	253.43	(11.91)	-4.0%	0	0
0.3	264.34	252.47	(11.87)	-4.0%	1.70	1.66	(0.04)	-2.0%	266.04	254.13	(11.91)	-4.0%	0	0
0.4	264.48	252.63	(11.85)	-4.0%	2.27	2.21	(0.06)	-3.0%	266.75	254.84	(11.91)	-4.0%	0	0
0.5	264.62	252.79	(11.83)	-4.0%	2.84	2.77	(0.07)	-2.0%	267.46	255.56	(11.90)	-4.0%	0	0
0.6	264.76	252.95	(11.81)	-4.0%	3.41	3.32	(0.09)	-3.0%	268.17	256.27	(11.90)	-4.0%	0	1
0.7	264.90	253.11	(11.79)	-4.0%	3.98	3.87	(0.11)	-3.0%	268.88	256.98	(11.90)	-4.0%	0	1
0.8	265.04	253.26	(11.78)	-4.0%	4.55	4.43	(0.12)	-3.0%	269.59	257.69	(11.90)	-4.0%	0	0
0.9	265.18	253.42	(11.76)	-4.0%	5.11	4.98	(0.13)	-3.0%	270.29	258.40	(11.89)	-4.0%	0	0
1.0	265.32	253.58	(11.74)	-4.0%	5.68	5.53	(0.15)	-3.0%	271.00	259.11	(11.89)	-4.0%	0	3
2.0	266.72	255.16	(11.56)	-4.0%	11.36	11.06	(0.30)	-3.0%	278.08	266.22	(11.86)	-4.0%	1	1
3.0	268.12	256.74	(11.38)	-4.0%	17.05	16.59	(0.46)	-3.0%	285.17	273.33	(11.84)	-4.0%	0	4
4.0	269.52	258.32	(11.20)	-4.0%	22.73	22.13	(0.60)	-3.0%	292.25	280.45	(11.80)	-4.0%	0	3
5.0	270.91	259.90	(11.01)	-4.0%	28.41	27.66	(0.75)	-3.0%	299.32	287.56	(11.76)	-4.0%	0	0
6.0	272.31	261.48	(10.83)	-4.0%	34.09	33.19	(0.90)	-3.0%	306.40	294.67	(11.73)	-4.0%	0	1
7.0	273.71	263.06	(10.65)	-4.0%	39.78	38.72	(1.06)	-3.0%	313.49	301.78	(11.71)	-4.0%	0	4
8.0	275.11	264.64	(10.47)	-4.0%	45.46	44.25	(1.21)	-3.0%	320.57	308.89	(11.68)	-4.0%	0	1
9.0	276.51	266.22	(10.29)	-4.0%	51.14	49.78	(1.36)	-3.0%	327.65	316.00	(11.65)	-4.0%	0	0
10	277.90	267.80	(10.10)	-4.0%	56.82	55.32	(1.50)	-3.0%	334.72	323.12	(11.60)	-3.0%	0	1
15	284.89	275.70	(9.19)	-3.0%	85.23	82.97	(2.26)	-3.0%	370.12	358.67	(11.45)	-3.0%	0	2
20	291.88	283.60	(8.28)	-3.0%	113.65	110.63	(3.02)	-3.0%	405.53	394.23	(11.30)	-3.0%	0	3
25	298.87	291.49	(7.38)	-2.0%	142.06	138.29	(3.77)	-3.0%	440.93	429.78	(11.15)	-3.0%	0	5
30	305.86	299.39	(6.47)	-2.0%	170.47	165.95	(4.52)	-3.0%	476.33	465.34	(10.99)	-2.0%	0	0
35	312.85	307.29	(5.56)	-2.0%	198.88	193.61	(5.27)	-3.0%	511.73	500.90	(10.83)	-2.0%	0	2
40	319.84	315.19	(4.65)	-1.0%	227.29	221.26	(6.03)	-3.0%	547.13	536.45	(10.68)	-2.0%	0	0
45	326.83	323.09	(3.74)	-1.0%	255.70	248.92	(6.78)	-3.0%	582.53	572.01	(10.52)	-2.0%	1	0
50	333.82	330.99	(2.83)	-1.0%	284.12	276.58	(7.54)	-3.0%	617.94	607.57	(10.37)	-2.0%	0	2
100	403.71	409.98	6.27	2.0%	568.23	553.16	(15.07)	-3.0%	971.94	963.14	(8.80)	-1.0%	0	4
150	473.60	488.97	15.37	3.0%	852.35	829.74	(22.61)	-3.0%	1,325.95	1,318.71	(7.24)	-1.0%	2	1
200	543.50	567.95	24.45	4.0%	1,136.46	1,106.32	(30.14)	-3.0%	1,679.96	1,674.27	(5.69)	0.0%	2	1
300	683.28	725.93	42.65	6.0%	1,704.69	1,659.49	(45.20)	-3.0%	2,387.97	2,385.42	(2.55)	0.0%	12	2
400	823.07	883.91	60.84	7.0%	2,272.92	2,212.65	(60.27)	-3.0%	3,095.99	3,096.56	0.57	0.0%	6	1
500	962.85	1,041.89	79.04	8.0%	2,841.15	2,765.81	(75.34)	-3.0%	3,804.00	3,807.70	3.70	0.0%	8	1
1,000	1,661.78	1,831.77	169.99	10.0%	5,682.30	5,531.62	(150.68)	-3.0%	7,344.08	7,363.39	19.31	0.0%	12	2
2,000	3,059.64	3,411.54	351.90	12.0%	11,364.60	11,063.24	(301.36)	-3.0%	14,424.24	14,474.78	50.54	0.0%	10	0
3,000	4,457.50	4,991.31	533.81	12.0%	17,046.90	16,594.86	(452.04)	-3.0%	21,504.40	21,586.17	81.77	0.0%	2	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
IVIS Sales

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage		Proposed	Bill Impact			Proposed	Bill Impact			Proposed	Bill Impact	
Month	(Mcf)	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent
November	184	$ 521.13	$ 542.68	$ 21.55	4.0%	$ 1,045.54	$ 1,017.82	$ (27.72)	-3.0%	$ 1,566.67	$ 1,560.50	$ (6.17)	0.0%
December	370	781.13	836.52	55.39	7.0%	2,102.45	2,046.70	(55.75)	-3.0%	2,883.58	2,883.22	(0.36)	0.0%
January	486	943.28	1,019.77	76.49	8.0%	2,761.60	2,688.37	(73.23)	-3.0%	3,704.88	3,708.14	3.26	0.0%
February	533	1,008.98	1,094.02	85.04	8.0%	3,028.67	2,948.35	(80.32)	-3.0%	4,037.65	4,042.37	4.72	0.0%
March	475	927.91	1,002.39	74.48	8.0%	2,699.09	2,627.52	(71.57)	-3.0%	3,627.00	3,629.91	2.91	0.0%
April	365	774.14	828.62	54.48	7.0%	2,074.04	2,019.04	(55.00)	-3.0%	2,848.18	2,847.66	(0.52)	0.0%
May	230	585.43	615.35	29.92	5.0%	1,306.93	1,272.27	(34.66)	-3.0%	1,892.36	1,887.62	(4.74)	0.0%
June	122	434.46	444.73	10.27	2.0%	693.24	674.86	(18.38)	-3.0%	1,127.70	1,119.59	(8.11)	-1.0%
July	91	391.13	395.76	4.63	1.0%	517.09	503.38	(13.71)	-3.0%	908.22	899.14	(9.08)	-1.0%
August	59	346.40	345.21	(1.19)	0.0%	335.26	326.37	(8.89)	-3.0%	681.66	671.58	(10.08)	-1.0%
September	63	351.99	351.53	(0.46)	0.0%	357.98	348.49	(9.49)	-3.0%	709.97	700.02	(9.95)	-1.0%
October	105	410.70	417.88	7.18	2.0%	596.64	580.82	(15.82)	-3.0%	1,007.34	998.70	(8.64)	-1.0%
Total	3,083	$ 7,476.68	$ 7,894.46	$ 417.78	5.59%	$ 17,518.53	$ 17,053.99	$ (464.54)	-2.65%	$ 24,995.21	$ 24,948.45	($46.76)	-0.19%
Winter (Nov-Mar)	2,048	$ 4,182.43	$ 4,495.38	$ 312.95	7.48%	$ 11,637.35	$ 11,328.76	$ (308.59)	-2.65%	$ 15,819.78	$ 15,824.14	$4.36	0.03%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
IVIS SATC

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	252.00	252.00	0.00	0.00%
Volumetric Distribution Charge	Per Mcf	1.3347	1.5798	0.2451	18.36%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
Rider E - Customer Education	Per Mcf	0.0000	0.0000	0.0000	0.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider A - Distribution Charge	Per Mcf	0.4453	0.4453	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.1507)	(0.1507)	-100.00%
Total Gas Cost	Per Mcf	0.4453	0.2946	(0.1507)	-33.84%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
IVIS SATC

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
			Bill Impact			Proposed	Bill Impact			Proposed	Bill Impact			
Mcf	Current Rates	Proposed Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	January	July
0	263.93	252.00	(11.93)	-5.0%	0.00	0.00	0.00	0.0%	263.93	252.00	(11.93)	-5.0%	0	2
15	284.89	275.70	(9.19)	-3.0%	6.68	4.42	(2.26)	-34.0%	291.57	280.12	(11.45)	-4.0%	0	1
50	333.82	330.99	(2.83)	-1.0%	22.27	14.73	(7.54)	-34.0%	356.09	345.72	(10.37)	-3.0%	0	0
100	403.71	409.98	6.27	2.0%	44.53	29.46	(15.07)	-34.0%	448.24	439.44	(8.80)	-2.0%	1	0
200	543.50	567.95	24.45	4.0%	89.06	58.92	(30.14)	-34.0%	632.56	626.87	(5.69)	-1.0%	0	0
300	683.28	725.93	42.65	6.0%	133.59	88.39	(45.20)	-34.0%	816.87	814.32	(2.55)	0.0%	1	0
400	823.07	883.91	60.84	7.0%	178.12	117.85	(60.27)	-34.0%	1,001.19	1,001.76	0.57	0.0%	0	0
500	962.85	1,041.89	79.04	8.0%	222.65	147.31	(75.34)	-34.0%	1,185.50	1,189.20	3.70	0.0%	0	0
1,000	1,661.78	1,831.77	169.99	10.0%	445.30	294.62	(150.68)	-34.0%	2,107.08	2,126.39	19.31	1.0%	2	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
IVIS SATC

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage		Proposed	Bill Impact			Proposed	Bill Impact			Proposed	Bill Impact	
Month	(Mcf)	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent
November	114	$ 423.28	$ 432.09	$ 8.81	2.0%	$ 50.76	$ 33.59	$ (17.17)	-34.0%	$ 474.04	$ 465.68	$ (8.36)	-2.0%
December	265	634.36	670.64	36.28	6.0%	118.00	78.07	(39.93)	-34.0%	752.36	748.71	(3.65)	0.0%
January	316	705.65	751.21	45.56	6.0%	140.71	93.10	(47.61)	-34.0%	846.36	844.31	(2.05)	0.0%
February	336	733.61	782.80	49.19	7.0%	149.62	98.99	(50.63)	-34.0%	883.23	881.79	(1.44)	0.0%
March	277	651.13	689.60	38.47	6.0%	123.35	81.61	(41.74)	-34.0%	774.48	771.21	(3.27)	0.0%
April	232	588.23	618.51	30.28	5.0%	103.31	68.35	(34.96)	-34.0%	691.54	686.86	(4.68)	-1.0%
May	129	444.25	455.79	11.54	3.0%	57.44	38.01	(19.43)	-34.0%	501.69	493.80	(7.89)	-2.0%
June	53	338.01	335.73	(2.28)	-1.0%	23.60	15.61	(7.99)	-34.0%	361.61	351.34	(10.27)	-3.0%
July	33	310.05	304.13	(5.92)	-2.0%	14.69	9.72	(4.97)	-34.0%	324.74	313.85	(10.89)	-3.0%
August	33	310.05	304.13	(5.92)	-2.0%	14.69	9.72	(4.97)	-34.0%	324.74	313.85	(10.89)	-3.0%
September	36	314.25	308.87	(5.38)	-2.0%	16.03	10.61	(5.42)	-34.0%	330.28	319.48	(10.80)	-3.0%
October	62	350.59	349.95	(0.64)	0.0%	27.61	18.27	(9.34)	-34.0%	378.20	368.22	(9.98)	-3.0%
Total	1,886	$ 5,803.46	$ 6,003.45	$ 199.99	3.45%	$ 839.81	$ 555.65	$ (284.16)	-33.84%	$ 6,643.27	$ 6,559.10	($84.17)	-1.27%
Winter (Nov-Mar)	1,308	$ 3,148.03	$ 3,326.34	$ 178.31	5.66%	$ 582.44	$ 385.36	$ (197.08)	-33.84%	$ 3,730.47	$ 3,711.70	($18.77)	-0.50%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
IVIS MMT

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	252.00	252.00	0.00	0.00%
Volumetric Distribution Charge	Per Mcf	1.3347	1.5798	0.2451	18.36%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
MMT Gas Cost Charge	Per Mcf	0.4900	0.4900	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.0641)	(0.0641)	-100.00%
Total Gas Cost	Per Mcf	0.4900	0.3800	(0.1100)	-29.02%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
IVIS MMT

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
	Current Rates	Proposed Rates	Bill Impact		Current Rates	Proposed Rates	Bill Impact		Current Rates	Proposed Rates	Bill Impact			
Mcf			Amount	Percent			Amount	Percent			Amount	Percent	January	July
0.0	252.00	252.00	0.00	0.0%	0.00	0.00	0.00	0.0%	252.00	252.00	0.00	0.0%	3	8
0.1	252.14	252.16	0.02	0.0%	0.05	0.04	(0.01)	-20.0%	252.19	252.20	0.01	0.0%	0	1
0.2	252.28	252.32	0.04	0.0%	0.10	0.09	(0.01)	-10.0%	252.38	252.41	0.03	0.0%	0	0
0.3	252.42	252.47	0.05	0.0%	0.15	0.13	(0.02)	-13.0%	252.57	252.60	0.03	0.0%	0	2
0.4	252.56	252.63	0.07	0.0%	0.20	0.17	(0.03)	-15.0%	252.76	252.80	0.04	0.0%	0	0
0.5	252.70	252.79	0.09	0.0%	0.25	0.21	(0.04)	-16.0%	252.95	253.00	0.05	0.0%	0	1
0.6	252.84	252.95	0.11	0.0%	0.29	0.26	(0.03)	-10.0%	253.13	253.21	0.08	0.0%	0	0
0.7	252.98	253.11	0.13	0.0%	0.34	0.30	(0.04)	-12.0%	253.32	253.41	0.09	0.0%	0	2
0.8	253.12	253.26	0.14	0.0%	0.39	0.34	(0.05)	-13.0%	253.51	253.60	0.09	0.0%	0	0
0.9	253.26	253.42	0.16	0.0%	0.44	0.38	(0.06)	-14.0%	253.70	253.80	0.10	0.0%	0	1
1.0	253.40	253.58	0.18	0.0%	0.49	0.43	(0.06)	-12.0%	253.89	254.01	0.12	0.0%	0	4
2.0	254.80	255.16	0.36	0.0%	0.98	0.85	(0.13)	-13.0%	255.78	256.01	0.23	0.0%	0	9
3.0	256.19	256.74	0.55	0.0%	1.47	1.28	(0.19)	-13.0%	257.66	258.02	0.36	0.0%	0	16
4.0	257.59	258.32	0.73	0.0%	1.96	1.70	(0.26)	-13.0%	259.55	260.02	0.47	0.0%	0	7
5.0	258.99	259.90	0.91	0.0%	2.45	2.13	(0.32)	-13.0%	261.44	262.03	0.59	0.0%	0	6
6.0	260.39	261.48	1.09	0.0%	2.94	2.56	(0.38)	-13.0%	263.33	264.04	0.71	0.0%	0	2
7.0	261.79	263.06	1.27	0.0%	3.43	2.98	(0.45)	-13.0%	265.22	266.04	0.82	0.0%	1	3
8.0	263.18	264.64	1.46	1.0%	3.92	3.41	(0.51)	-13.0%	267.10	268.05	0.95	0.0%	0	4
9.0	264.58	266.22	1.64	1.0%	4.41	3.83	(0.58)	-13.0%	268.99	270.05	1.06	0.0%	0	3
10	265.98	267.80	1.82	1.0%	4.90	4.26	(0.64)	-13.0%	270.88	272.06	1.18	0.0%	0	5
15	272.97	275.70	2.73	1.0%	7.35	6.39	(0.96)	-13.0%	280.32	282.09	1.77	1.0%	0	15
20	279.96	283.60	3.64	1.0%	9.80	8.52	(1.28)	-13.0%	289.76	292.12	2.36	1.0%	0	8
25	286.95	291.49	4.54	2.0%	12.25	10.65	(1.60)	-13.0%	299.20	302.14	2.94	1.0%	0	4
30	293.94	299.39	5.45	2.0%	14.70	12.78	(1.92)	-13.0%	308.64	312.17	3.53	1.0%	0	4
35	300.93	307.29	6.36	2.0%	17.15	14.91	(2.24)	-13.0%	318.08	322.20	4.12	1.0%	0	7
40	307.91	315.19	7.28	2.0%	19.60	17.04	(2.56)	-13.0%	327.51	332.23	4.72	1.0%	0	4
45	314.90	323.09	8.19	3.0%	22.05	19.17	(2.88)	-13.0%	336.95	342.26	5.31	2.0%	0	3
50	321.89	330.99	9.10	3.0%	24.50	21.30	(3.20)	-13.0%	346.39	352.29	5.90	2.0%	0	4
100	391.79	409.98	18.19	5.0%	49.00	42.59	(6.41)	-13.0%	440.79	452.57	11.78	3.0%	2	21
150	461.68	488.97	27.29	6.0%	73.50	63.89	(9.61)	-13.0%	535.18	552.86	17.68	3.0%	3	20
200	531.57	567.95	36.38	7.0%	98.00	85.18	(12.82)	-13.0%	629.57	653.13	23.56	4.0%	9	11
300	671.36	725.93	54.57	8.0%	147.00	127.77	(19.23)	-13.0%	818.36	853.70	35.34	4.0%	23	12
400	811.14	883.91	72.77	9.0%	196.00	170.36	(25.64)	-13.0%	1,007.14	1,054.27	47.13	5.0%	34	11
500	950.93	1,041.89	90.96	10.0%	245.00	212.96	(32.04)	-13.0%	1,195.93	1,254.85	58.92	5.0%	21	7
1,000	1,649.86	1,831.77	181.91	11.0%	490.00	425.91	(64.09)	-13.0%	2,139.86	2,257.68	117.82	6.0%	81	27
2,000	3,047.72	3,411.54	363.82	12.0%	980.00	851.82	(128.18)	-13.0%	4,027.72	4,263.36	235.64	6.0%	51	15
3,000	4,445.58	4,991.31	545.73	12.0%	1,470.00	1,277.73	(192.27)	-13.0%	5,915.58	6,269.04	353.46	6.0%	21	5
4,000	5,843.44	6,571.08	727.64	12.0%	1,960.00	1,703.64	(256.36)	-13.0%	7,803.44	8,274.72	471.28	6.0%	8	6
5,000	7,241.30	8,150.86	909.56	13.0%	2,450.00	2,129.55	(320.45)	-13.0%	9,691.30	10,280.41	589.11	6.0%	3	0
6,000	8,639.16	9,730.63	1,091.47	13.0%	2,940.00	2,555.46	(384.54)	-13.0%	11,579.16	12,286.09	706.93	6.0%	0	0
7,000	10,037.02	11,310.40	1,273.38	13.0%	3,430.00	2,981.37	(448.63)	-13.0%	13,467.02	14,291.77	824.75	6.0%	0	0
7,500	10,735.95	12,100.28	1,364.33	13.0%	3,675.00	3,194.33	(480.67)	-13.0%	14,410.95	15,294.61	883.66	6.0%	3	3

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
IVIS MMT

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage		Proposed	Bill Impact			Proposed	Bill Impact			Proposed	Bill Impact	
Month	(Mcf)	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent
November	728	$ 1,269.64	$ 1,402.07	$ 132.43	10.0%	$ 356.72	$ 310.06	$ (46.66)	-13.0%	$ 1,626.36	$ 1,712.13	$ 85.77	5.0%
December	870	1,468.14	1,626.40	158.26	11.0%	426.30	370.54	(55.76)	-13.0%	1,894.44	1,996.94	102.50	5.0%
January	996	1,644.27	1,825.45	181.18	11.0%	488.04	424.21	(63.83)	-13.0%	2,132.31	2,249.66	117.35	6.0%
February	1,139	1,844.16	2,051.36	207.20	11.0%	558.11	485.11	(73.00)	-13.0%	2,402.27	2,536.47	134.20	6.0%
March	1,036	1,700.18	1,888.64	188.46	11.0%	507.64	441.24	(66.40)	-13.0%	2,207.82	2,329.88	122.06	6.0%
April	941	1,567.39	1,738.56	171.17	11.0%	461.09	400.78	(60.31)	-13.0%	2,028.48	2,139.34	110.86	5.0%
May	684	1,208.14	1,332.56	124.42	10.0%	335.16	291.32	(43.84)	-13.0%	1,543.30	1,623.88	80.58	5.0%
June	600	1,090.72	1,199.86	109.14	10.0%	294.00	255.55	(38.45)	-13.0%	1,384.72	1,455.41	70.69	5.0%
July	559	1,033.40	1,135.09	101.69	10.0%	273.91	238.08	(35.83)	-13.0%	1,307.31	1,373.17	65.86	5.0%
August	549	1,019.43	1,119.29	99.86	10.0%	269.01	233.82	(35.19)	-13.0%	1,288.44	1,353.11	64.67	5.0%
September	559	1,033.40	1,135.09	101.69	10.0%	273.91	238.08	(35.83)	-13.0%	1,307.31	1,373.17	65.86	5.0%
October	587	1,072.54	1,179.33	106.79	10.0%	287.63	250.01	(37.62)	-13.0%	1,360.17	1,429.34	69.17	5.0%
Total	9,248	$ 15,951.41	$ 17,633.70	$ 1,682.29	10.55%	$ 4,531.52	$ 3,938.80	$ (592.72)	-13.08%	$ 20,482.93	$ 21,572.50	$1,089.57	5.32%
Winter (Nov-Mar)	4,769	$ 7,926.39	$ 8,793.92	$ 867.53	10.94%	$ 2,336.81	$ 2,031.16	$ (305.65)	-13.08%	$ 10,263.20	$ 10,825.08	$561.88	5.47%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
IVIS DMT

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	252.00	252.00	0.00	0.00%
Volumetric Distribution Charge	Per Mcf	1.3347	1.5798	0.2451	18.36%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider I - OPEB	Per Mcf	0.0000	(0.0641)	(0.0641)	-100.00%
Total Gas Cost	Per Mcf	0.4900	0.3800	(0.1100)	-29.02%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
IVIS DMT

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
	Current Rates	Proposed Rates	Bill Impact		Current Rates	Proposed Rates	Bill Impact		Current Rates	Proposed Rates	Bill Impact			
Mcf			Amount	Percent			Amount	Percent			Amount	Percent	January	July
0	252.00	252.00	0.00	0.0%	0.00	0.00	0.00	0.0%	252.00	252.00	0.00	0.0%	0	1
45	314.90	323.09	8.19	3.0%	0.00	(2.88)	(2.88)	-100.00%	314.90	320.21	5.31	2.0%	0	1
50	321.89	330.99	9.10	3.0%	0.00	(3.20)	(3.20)	-100.00%	321.89	327.79	5.90	2.0%	0	0
100	391.79	409.98	18.19	5.0%	0.00	(6.41)	(6.41)	-100.00%	391.79	403.57	11.78	3.0%	0	0
150	461.68	488.97	27.29	6.0%	0.00	(9.61)	(9.61)	-100.00%	461.68	479.36	17.68	4.0%	0	0
200	531.57	567.95	36.38	7.0%	0.00	(12.82)	(12.82)	-100.00%	531.57	555.13	23.56	4.0%	0	0
300	671.36	725.93	54.57	8.0%	0.00	(19.23)	(19.23)	-100.00%	671.36	706.70	35.34	5.0%	0	1
400	811.14	883.91	72.77	9.0%	0.00	(25.64)	(25.64)	-100.00%	811.14	858.27	47.13	6.0%	0	1
500	950.93	1,041.89	90.96	10.0%	0.00	(32.05)	(32.05)	-100.00%	950.93	1,009.84	58.91	6.0%	0	1
1,000	1,649.86	1,831.77	181.91	11.0%	0.00	(64.09)	(64.09)	-100.00%	1,649.86	1,767.68	117.82	7.0%	2	2
2,000	3,047.72	3,411.54	363.82	12.0%	0.00	(128.18)	(128.18)	-100.00%	3,047.72	3,283.36	235.64	8.0%	4	8
3,000	4,445.58	4,991.31	545.73	12.0%	0.00	(192.27)	(192.27)	-100.00%	4,445.58	4,799.04	353.46	8.0%	4	7
4,000	5,843.44	6,571.08	727.64	12.0%	0.00	(256.36)	(256.36)	-100.00%	5,843.44	6,314.72	471.28	8.0%	7	4
5,000	7,241.30	8,150.86	909.56	13.0%	0.00	(320.45)	(320.45)	-100.00%	7,241.30	7,830.41	589.11	8.0%	5	0
6,000	8,639.16	9,730.63	1,091.47	13.0%	0.00	(384.54)	(384.54)	-100.00%	8,639.16	9,346.09	706.93	8.0%	0	0
7,000	10,037.02	11,310.40	1,273.38	13.0%	0.00	(448.63)	(448.63)	-100.00%	10,037.02	10,861.77	824.75	8.0%	0	0
7,500	10,735.95	12,100.28	1,364.33	13.0%	0.00	(480.68)	(480.68)	-100.00%	10,735.95	11,619.60	883.65	8.0%	2	0

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
IVIS DMT

Annual Bill Impact															
		Delivery				Commodity				Total			
Month	Usage (Mcf)	Current Rates	Proposed Rates	Bill Impact Amount	Percent	Current Rates	Proposed Rates	Bill Impact Amount	Percent	Current Rates	Proposed Rates	Bill Impact Amount	Percent
November	2,255	$ 3,404.17	$ 3,814.38	$ 410.21	12.0%	$ -	$ (144.52)	$ (144.52)	0.0%	$ 3,404.17	$ 3,669.86	$ 265.69	8.0%
December	2,585	3,865.47	4,335.71	470.24	12.0%	-	(165.67)	(165.67)	-100.0%	3,865.47	4,170.04	304.57	8.0%
January	2,970	4,403.64	4,943.92	540.28	12.0%	-	(190.35)	(190.35)	-100.0%	4,403.64	4,753.57	349.93	8.0%
February	3,631	5,327.63	5,988.15	660.52	12.0%	-	(232.71)	(232.71)	-100.0%	5,327.63	5,755.44	427.81	8.0%
March	3,251	4,796.44	5,387.84	591.40	12.0%	-	(208.36)	(208.36)	-100.0%	4,796.44	5,179.48	383.04	8.0%
April	3,132	4,630.10	5,199.84	569.74	12.0%	-	(200.73)	(200.73)	-100.0%	4,630.10	4,999.11	369.01	8.0%
May	2,541	3,803.96	4,266.20	462.24	12.0%	-	(162.85)	(162.85)	-100.0%	3,803.96	4,103.35	299.39	8.0%
June	2,139	3,242.02	3,631.13	389.11	12.0%	-	(137.09)	(137.09)	-100.0%	3,242.02	3,494.04	252.02	8.0%
July	1,875	2,872.99	3,214.07	341.08	12.0%	-	(120.17)	(120.17)	-100.0%	2,872.99	3,093.90	220.91	8.0%
August	1,685	2,607.39	2,913.91	306.52	12.0%	-	(107.99)	(107.99)	-100.0%	2,607.39	2,805.92	198.53	8.0%
September	1,801	2,769.55	3,097.17	327.62	12.0%	-	(115.43)	(115.43)	-100.0%	2,769.55	2,981.74	212.19	8.0%
October	1,768	2,723.42	3,045.04	321.62	12.0%	-	(113.31)	(113.31)	-100.0%	2,723.42	2,931.73	208.31	8.0%
Total	29,633	$ 44,446.78	$ 49,837.36	$ 5,390.58	12.13%	$ -	$ (1,899.18)	$ (1,899.18)	-100.00%	$ 44,446.78	$ 47,938.18	$3,491.40	7.86%
Winter (Nov-Mar)	14,692	$ 21,797.35	$ 24,470.00	$ 2,672.65	12.26%	$ -	$ (941.61)	$ (941.61)	-100.00%	$ 21,797.35	$ 23,528.39	$1,731.04	7.94%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LVIS MMT

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	1,023.00	1,400.00	377.00	36.85%
Volumetric Distribution Charge	Per Mcf	1.0243	1.1446	0.1203	11.74%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
MMT Gas Cost Charge	Per Mcf	0.4900	0.4900	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.0756)	(0.0756)	-100.00%
Total Gas Cost	Per Mcf	0.4900	0.3800	(0.1100)	-29.02%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LVIS MMT

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
			Bill Impact			Proposed	Bill Impact			Proposed	Bill Impact			
Mcf	Current Rates	Proposed Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	January	July
0	1,023.00	1,400.00	377.00	37.0%	0.00	0.00	0.00	0.0%	1,023.00	1,400.00	377.00	37.0%	0	0
1,000	2,095.77	2,544.58	448.81	21.0%	490.00	414.43	(75.57)	-15.0%	2,585.77	2,959.01	373.24	14.0%	0	0
2,000	3,168.54	3,689.15	520.61	16.0%	980.00	828.86	(151.14)	-15.0%	4,148.54	4,518.01	369.47	9.0%	1	1
3,000	4,241.31	4,833.73	592.42	14.0%	1,470.00	1,243.29	(226.71)	-15.0%	5,711.31	6,077.02	365.71	6.0%	0	1
4,000	5,314.09	5,978.30	664.21	12.0%	1,960.00	1,657.72	(302.28)	-15.0%	7,274.09	7,636.02	361.93	5.0%	0	0
5,000	6,386.86	7,122.88	736.02	12.0%	2,450.00	2,072.15	(377.85)	-15.0%	8,836.86	9,195.03	358.17	4.0%	1	2
6,000	7,459.63	8,267.45	807.82	11.0%	2,940.00	2,486.58	(453.42)	-15.0%	10,399.63	10,754.03	354.40	3.0%	0	0
7,000	8,532.40	9,412.03	879.63	10.0%	3,430.00	2,901.01	(528.99)	-15.0%	11,962.40	12,313.04	350.64	3.0%	0	0
7,500	9,068.79	9,984.31	915.52	10.0%	3,675.00	3,108.23	(566.77)	-15.0%	12,743.79	13,092.54	348.75	3.0%	3	3
8,000	9,605.17	10,556.60	951.43	10.0%	3,920.00	3,315.44	(604.56)	-15.0%	13,525.17	13,872.04	346.87	3.0%	0	0
9,000	10,677.94	11,701.18	1,023.24	10.0%	4,410.00	3,729.87	(680.13)	-15.0%	15,087.94	15,431.05	343.11	2.0%	0	0
10,000	11,750.71	12,845.75	1,095.04	9.0%	4,900.00	4,144.30	(755.70)	-15.0%	16,650.71	16,990.05	339.34	2.0%	2	0
20,000	22,478.43	24,291.50	1,813.07	8.0%	9,800.00	8,288.60	(1,511.40)	-15.0%	32,278.43	32,580.10	301.67	1.0%	0	1

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LVIS MMT

Annual Bill Impact															
		Delivery				Commodity				Total			
Month	Usage (Mcf)	Current Rates	Proposed Rates	Bill Impact Amount	Bill Impact Percent	Current Rates	Proposed Rates	Bill Impact Amount	Bill Impact Percent	Current Rates	Proposed Rates	Bill Impact Amount	Bill Impact Percent
November	5,272	$ 6,678.65	$ 7,434.20	$ 755.55	11.0%	$ 2,583.28	$ 2,184.87	$ (398.41)	-15.0%	$ 9,261.93	$ 9,619.07	$ 357.14	4.0%
December	5,875	7,325.53	8,124.38	798.85	11.0%	2,878.75	2,434.78	(443.97)	-15.0%	10,204.28	10,559.16	354.88	3.0%
January	6,044	7,506.83	8,317.81	810.98	11.0%	2,961.56	2,504.81	(456.75)	-15.0%	10,468.39	10,822.62	354.23	3.0%
February	6,199	7,673.11	8,495.22	822.11	11.0%	3,037.51	2,569.05	(468.46)	-15.0%	10,710.62	11,064.27	353.65	3.0%
March	5,954	7,410.28	8,214.80	804.52	11.0%	2,917.46	2,467.52	(449.94)	-15.0%	10,327.74	10,682.32	354.58	3.0%
April	6,294	7,775.02	8,603.96	828.94	11.0%	3,084.06	2,608.42	(475.64)	-15.0%	10,859.08	11,212.38	353.30	3.0%
May	5,541	6,967.23	7,742.09	774.86	11.0%	2,715.09	2,296.36	(418.73)	-15.0%	9,682.32	10,038.45	356.13	4.0%
June	5,649	7,083.09	7,865.70	782.61	11.0%	2,768.01	2,341.12	(426.89)	-15.0%	9,851.10	10,206.82	355.72	4.0%
July	4,939	6,321.42	7,053.06	731.64	12.0%	2,420.11	2,046.87	(373.24)	-15.0%	8,741.53	9,099.93	358.40	4.0%
August	4,815	6,188.39	6,911.13	722.74	12.0%	2,359.35	1,995.48	(363.87)	-15.0%	8,547.74	8,906.61	358.87	4.0%
September	5,469	6,889.99	7,659.68	769.69	11.0%	2,679.81	2,266.52	(413.29)	-15.0%	9,569.80	9,926.20	356.40	4.0%
October	4,807	6,179.81	6,901.97	722.16	12.0%	2,355.43	1,992.17	(363.26)	-15.0%	8,535.24	8,894.14	358.90	4.0%
Total	66,858	$ 83,999.35	$ 93,324.00	$ 9,324.65	11.10%	$ 32,760.42	$ 27,707.97	$ (5,052.45)	-15.42%	$ 116,759.77	$ 121,031.97	$4,272.20	3.66%
Winter (Nov-Mar)	29,344	$ 36,594.40	$ 40,586.41	$ 3,992.01	10.91%	$ 14,378.56	$ 12,161.03	$ (2,217.53)	-15.42%	$ 50,972.96	$ 52,747.44	$1,774.48	3.48%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LVIS DMT

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	1,023.00	1,400.00	377.00	36.85%
Volumetric Distribution Charge	Per Mcf	1.0243	1.1446	0.1203	11.74%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider I - OPEB	Per Mcf	0.0000	(0.0756)	(0.0756)	-100.00%
Total Gas Cost	Per Mcf	0.4900	0.3800	(0.1100)	-29.02%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LVIS DMT

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
			Bill Impact			Proposed	Bill Impact			Proposed	Bill Impact			
Mcf	Current Rates	Proposed Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	January	July
0	1,023.00	1,400.00	377.00	37.0%	0.00	0.00	0.00	0.0%	1,023.00	1,400.00	377.00	37.0%	0	0
1,000	2,095.77	2,544.58	448.81	21.0%	0.00	(75.57)	(75.57)	-100.00%	2,095.77	2,469.01	373.24	18.0%	0	0
2,000	3,168.54	3,689.15	520.61	16.0%	0.00	(151.14)	(151.14)	-100.00%	3,168.54	3,538.01	369.47	12.0%	0	0
3,000	4,241.31	4,833.73	592.42	14.0%	0.00	(226.71)	(226.71)	-100.00%	4,241.31	4,607.02	365.71	9.0%	1	4
4,000	5,314.09	5,978.30	664.21	12.0%	0.00	(302.28)	(302.28)	-100.00%	5,314.09	5,676.02	361.93	7.0%	0	3
5,000	6,386.86	7,122.88	736.02	12.0%	0.00	(377.85)	(377.85)	-100.00%	6,386.86	6,745.03	358.17	6.0%	1	2
6,000	7,459.63	8,267.45	807.82	11.0%	0.00	(453.42)	(453.42)	-100.00%	7,459.63	7,814.03	354.40	5.0%	0	0
7,000	8,532.40	9,412.03	879.63	10.0%	0.00	(528.99)	(528.99)	-100.00%	8,532.40	8,883.04	350.64	4.0%	0	0
7,500	9,068.79	9,984.31	915.52	10.0%	0.00	(566.78)	(566.78)	-100.00%	9,068.79	9,417.53	348.74	4.0%	5	6
8,000	9,605.17	10,556.60	951.43	10.0%	0.00	(604.56)	(604.56)	-100.00%	9,605.17	9,952.04	346.87	4.0%	0	0
9,000	10,677.94	11,701.18	1,023.24	10.0%	0.00	(680.13)	(680.13)	-100.00%	10,677.94	11,021.05	343.11	3.0%	0	0
10,000	11,750.71	12,845.75	1,095.04	9.0%	0.00	(755.70)	(755.70)	-100.00%	11,750.71	12,090.05	339.34	3.0%	6	2
20,000	22,478.43	24,291.50	1,813.07	8.0%	0.00	(1,511.40)	(1,511.40)	-100.00%	22,478.43	22,780.10	301.67	1.0%	7	2

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LVIS DMT

Annual Bill Impact															
		Delivery				Commodity				Total					
			Proposed	Bill Impact			Proposed	Bill Impact			Proposed	Bill Impact	
Month	Usage (Mcf)	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent
November	7,009	$ 8,542.05	$ 9,422.33	$ 880.28	10.0%	$ -	$ (529.67)	$ (529.67)	0.0%	$ 8,542.05	$ 8,892.66	$ 350.61	4.0%
December	8,072	9,682.41	10,639.01	956.60	10.0%	-	(610.00)	(610.00)	-100.0%	9,682.41	10,029.01	346.60	4.0%
January	9,346	11,049.12	12,097.20	1,048.08	9.0%	-	(706.28)	(706.28)	-100.0%	11,049.12	11,390.92	341.80	3.0%
February	11,265	13,107.77	14,293.64	1,185.87	9.0%	-	(851.30)	(851.30)	-100.0%	13,107.77	13,442.34	334.57	3.0%
March	9,743	11,475.01	12,551.59	1,076.58	9.0%	-	(736.28)	(736.28)	-100.0%	11,475.01	11,815.31	340.30	3.0%
April	9,426	11,134.94	12,188.76	1,053.82	9.0%	-	(712.32)	(712.32)	-100.0%	11,134.94	11,476.44	341.50	3.0%
May	7,688	9,270.47	10,199.49	929.02	10.0%	-	(580.98)	(580.98)	-100.0%	9,270.47	9,618.51	348.04	4.0%
June	6,649	8,155.86	9,010.28	854.42	10.0%	-	(502.46)	(502.46)	-100.0%	8,155.86	8,507.82	351.96	4.0%
July	5,939	7,394.19	8,197.63	803.44	11.0%	-	(448.81)	(448.81)	-100.0%	7,394.19	7,748.82	354.63	5.0%
August	5,627	7,059.48	7,840.52	781.04	11.0%	-	(425.23)	(425.23)	-100.0%	7,059.48	7,415.29	355.81	5.0%
September	6,074	7,539.01	8,352.15	813.14	11.0%	-	(459.01)	(459.01)	-100.0%	7,539.01	7,893.14	354.13	5.0%
October	6,105	7,572.27	8,387.63	815.36	11.0%	-	(461.35)	(461.35)	-100.0%	7,572.27	7,926.28	354.01	5.0%
Total	92,943	$ 111,982.58	$ 123,180.23	$ 11,197.65	10.00%	$ -	$ (7,023.69)	$ (7,023.69)	-100.00%	$ 111,982.58	$ 116,156.54	$4,173.96	3.73%
Winter (Nov-Mar)	45,435	$ 53,856.36	$ 59,003.77	$ 5,147.41	9.56%	$ -	$ (3,433.53)	$ (3,433.53)	-100.00%	$ 53,856.36	$ 55,570.24	$1,713.88	3.18%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LIS MMT

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	1,165.00	1,700.00	535.00	45.92%
Volumetric Distribution Charge	Per Mcf	0.5993	0.6764	0.0771	12.86%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
MMT Gas Cost Charge	Per Mcf	0.4900	0.4900	0.0000	0.00%
Rider I - OPEB	Per Mcf	0.0000	(0.0472)	(0.0472)	-100.00%
Total Gas Cost	Per Mcf	0.4900	0.3800	(0.1100)	-29.02%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LIS MMT

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
			Bill Impact			Proposed	Bill Impact			Proposed	Bill Impact			
Mcf	Current Rates	Proposed Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	January	July
0	1,165.00	1,700.00	535.00	46.0%	0.00	0.00	0.00	0.0%	1,165.00	1,700.00	535.00	46.0%	0	0
25,000	16,856.49	18,608.82	1,752.33	10.0%	12,250.00	11,071.25	(1,178.75)	-10.0%	29,106.49	29,680.07	573.58	2.0%	0	0
50,000	32,547.99	35,517.64	2,969.65	9.0%	24,500.00	22,142.50	(2,357.50)	-10.0%	57,047.99	57,660.14	612.15	1.0%	1	1

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LIS MMT

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage		Proposed	Bill Impact			Proposed	Bill Impact			Proposed	Bill Impact	
Month	(Mcf)	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent
November	30,733	$ 20,454.87	$ 22,486.35	$ 2,031.48	10.0%	$ 15,059.17	$ 13,610.11	$ (1,449.06)	-10.0%	$ 35,514.04	$ 36,096.46	$ 582.42	2.0%
December	29,878	19,918.22	21,908.07	1,989.85	10.0%	14,640.22	13,231.47	(1,408.75)	-10.0%	34,558.44	35,139.54	581.10	2.0%
January	29,763	19,846.04	21,830.29	1,984.25	10.0%	14,583.87	13,180.54	(1,403.33)	-10.0%	34,429.91	35,010.83	580.92	2.0%
February	34,035	22,527.40	24,719.67	2,192.27	10.0%	16,677.15	15,072.40	(1,604.75)	-10.0%	39,204.55	39,792.07	587.52	1.0%
March	29,755	19,841.02	21,824.88	1,983.86	10.0%	14,579.95	13,177.00	(1,402.95)	-10.0%	34,420.97	35,001.88	580.91	2.0%
April	33,124	21,955.60	24,103.51	2,147.91	10.0%	16,230.76	14,668.96	(1,561.80)	-10.0%	38,186.36	38,772.47	586.11	2.0%
May	26,802	17,987.54	19,827.61	1,840.07	10.0%	13,132.98	11,869.27	(1,263.71)	-10.0%	31,120.52	31,696.88	576.36	2.0%
June	28,844	19,269.22	21,208.72	1,939.50	10.0%	14,133.56	12,773.57	(1,359.99)	-10.0%	33,402.78	33,982.29	579.51	2.0%
July	29,838	19,893.11	21,881.02	1,987.91	10.0%	14,620.62	13,213.76	(1,406.86)	-10.0%	34,513.73	35,094.78	581.05	2.0%
August	29,210	19,498.94	21,456.27	1,957.33	10.0%	14,312.90	12,935.65	(1,377.25)	-10.0%	33,811.84	34,391.92	580.08	2.0%
September	29,192	19,487.64	21,444.09	1,956.45	10.0%	14,304.08	12,927.68	(1,376.40)	-10.0%	33,791.72	34,371.77	580.05	2.0%
October	27,095	18,171.44	20,025.78	1,854.34	10.0%	13,276.55	11,999.02	(1,277.53)	-10.0%	31,447.99	32,024.80	576.81	2.0%
Total	358,269	$ 238,851.04	$ 262,716.26	$ 23,865.22	9.99%	$ 175,551.81	$ 158,659.43	$ (16,892.38)	-9.62%	$ 414,402.85	$ 421,375.69	$6,972.84	1.68%
Winter (Nov-Mar)	154,164	$ 102,587.55	$ 112,769.26	$ 10,181.71	9.92%	$ 75,540.36	$ 68,271.52	$ (7,268.84)	-9.62%	$ 178,127.91	$ 181,040.78	$2,912.87	1.64%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LIS DMT

Billing Determinants					
	Unit	Current Rates	Proposed Rates	Increase/ (Decrease)	Percent Change
Base Delivery Rates					
Basic Service Charge	Per Mcf	1,165.00	1,700.00	535.00	45.92%
Volumetric Distribution Charge	Per Mcf	0.5993	0.6764	0.0771	12.86%
Rider B - State Tax Adjustment	Per Mcf	-0.27%	0.00%	0.27%	-100.00%
DSIC - Distribution System Improvement Charge	Per Mcf	5.00%	0.00%	-5.00%	-100.00%
Gas Cost Rates					
Rider I - OPEB	Per Mcf	0.0000	(0.0472)	(0.0472)	-100.00%
Total Gas Cost	Per Mcf	0.4900	0.3800	(0.1100)	-29.02%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LIS DMT

	Monthly Bill Impact												Number of Cycle Bills	
	Delivery				Commodity				Total					
Mcf	Current Rates	Proposed Rates	Bill Impact Amount	Bill Impact Percent	Current Rates	Proposed Rates	Bill Impact Amount	Bill Impact Percent	Current Rates	Proposed Rates	Bill Impact Amount	Bill Impact Percent	January	July
0	1,165.00	1,700.00	535.00	46.0%	0.00	0.00	0.00	0.0%	1,165.00	1,700.00	535.00	46.0%	0	2
400	1,416.06	1,970.54	554.48	39.0%	0.00	(18.86)	(18.86)	-100.00%	1,416.06	1,951.68	535.62	38.0%	0	1
500	1,478.83	2,038.18	559.35	38.0%	0.00	(23.58)	(23.58)	-100.00%	1,478.83	2,014.60	535.77	36.0%	0	0
1,000	1,792.66	2,376.35	583.69	33.0%	0.00	(47.15)	(47.15)	-100.00%	1,792.66	2,329.20	536.54	30.0%	0	0
3,000	3,047.98	3,729.06	681.08	22.0%	0.00	(141.45)	(141.45)	-100.00%	3,047.98	3,587.61	539.63	18.0%	0	1
5,000	4,303.30	5,081.76	778.46	18.0%	0.00	(235.75)	(235.75)	-100.00%	4,303.30	4,846.01	542.71	13.0%	0	0
10,000	7,441.60	8,463.53	1,021.93	14.0%	0.00	(471.50)	(471.50)	-100.00%	7,441.60	7,992.03	550.43	7.0%	0	0
15,000	10,579.90	11,845.29	1,265.39	12.0%	0.00	(707.25)	(707.25)	-100.00%	10,579.90	11,138.04	558.14	5.0%	0	0
20,000	13,718.20	15,227.06	1,508.86	11.0%	0.00	(943.00)	(943.00)	-100.00%	13,718.20	14,284.06	565.86	4.0%	3	4
25,000	16,856.49	18,608.82	1,752.33	10.0%	0.00	(1,178.75)	(1,178.75)	-100.00%	16,856.49	17,430.07	573.58	3.0%	2	0
50,000	32,547.99	35,517.64	2,969.65	9.0%	0.00	(2,357.50)	(2,357.50)	-100.00%	32,547.99	33,160.14	612.15	2.0%	2	1
100,000	63,930.98	69,335.28	5,404.30	8.0%	0.00	(4,715.00)	(4,715.00)	-100.00%	63,930.98	64,620.28	689.30	1.0%	0	0
200,000	126,696.95	136,970.56	10,273.61	8.0%	0.00	(9,430.00)	(9,430.00)	-100.00%	126,696.95	127,540.56	843.61	1.0%	2	1

National Fuel Gas Distribution Corporation
Pennsylvania Division
Bill Impacts
LIS DMT

Annual Bill Impact															
		Delivery				Commodity				Total			
	Usage		Proposed	Bill Impact			Proposed	Bill Impact			Proposed	Bill Impact	
Month	(Mcf)	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent	Current Rates	Rates	Amount	Percent
November	27,441	$ 18,388.61	$ 20,259.80	$ 1,871.19	10.0%	$ -	$ (1,293.84)	$ (1,293.84)	0.0%	$ 18,388.61	$ 18,965.96	$ 577.35	3.0%
December	32,066	21,291.54	23,387.93	2,096.39	10.0%	-	(1,511.91)	(1,511.91)	-100.0%	21,291.54	21,876.02	584.48	3.0%
January	39,435	25,916.76	28,371.97	2,455.21	9.0%	-	(1,859.36)	(1,859.36)	-100.0%	25,916.76	26,512.61	595.85	2.0%
February	44,677	29,206.95	31,917.41	2,710.46	9.0%	-	(2,106.52)	(2,106.52)	-100.0%	29,206.95	29,810.89	603.94	2.0%
March	40,865	26,814.32	29,339.16	2,524.84	9.0%	-	(1,926.78)	(1,926.78)	-100.0%	26,814.32	27,412.38	598.06	2.0%
April	39,721	26,096.27	28,565.41	2,469.14	9.0%	-	(1,872.85)	(1,872.85)	-100.0%	26,096.27	26,692.56	596.29	2.0%
May	29,790	19,862.98	21,848.55	1,985.57	10.0%	-	(1,404.60)	(1,404.60)	-100.0%	19,862.98	20,443.95	580.97	3.0%
June	23,599	15,977.14	17,661.25	1,684.11	11.0%	-	(1,112.69)	(1,112.69)	-100.0%	15,977.14	16,548.56	571.42	4.0%
July	23,336	15,812.07	17,483.37	1,671.30	11.0%	-	(1,100.29)	(1,100.29)	-100.0%	15,812.07	16,383.08	571.01	4.0%
August	23,739	16,065.01	17,755.94	1,690.93	11.0%	-	(1,119.29)	(1,119.29)	-100.0%	16,065.01	16,636.65	571.64	4.0%
September	24,253	16,387.63	18,103.58	1,715.95	10.0%	-	(1,143.53)	(1,143.53)	-100.0%	16,387.63	16,960.05	572.42	3.0%
October	22,743	15,439.87	17,082.29	1,642.42	11.0%	-	(1,072.33)	(1,072.33)	-100.0%	15,439.87	16,009.96	570.09	4.0%
Total	371,665	$ 247,259.15	$ 271,776.66	$ 24,517.51	9.92%	$ -	$ (17,523.99)	$ (17,523.99)	-100.00%	$ 247,259.15	$ 254,252.67	$6,993.52	2.83%
Winter (Nov-Mar)	184,484	$ 121,618.18	$ 133,276.27	$ 11,658.09	9.59%	$ -	$ (8,698.41)	$ (8,698.41)	-100.00%	$ 121,618.18	$ 124,577.86	$2,959.68	2.43%

National Fuel Gas Distribution Corporation
Pennsylvania Division
Cost of Service Estimates
Incremental Plant in Year 1
Load Justified Investment and Levelized Fixed Charge

Case R-2025-3059428

Fully Embedded LJI Model

Number of Years	Levelized Fixed Charge	Justified Investment per $1 of Incremental Margin
1	1.45051	$0.69
2	0.75575	$1.32
3	0.52471	$1.91
4	0.40960	$2.44
5	0.34086	$2.93
6	0.29530	$3.39
7	0.26299	$3.80
8	0.23895	$4.18
9	0.22043	$4.54
10	0.20577	$4.86
11	0.19391	$5.16
12	0.18416	$5.43
13	0.17602	$5.68
14	0.16914	$5.91
15	0.16328	$6.12
16	0.15824	$6.32
17	0.15387	$6.50
18	0.15007	$6.66
19	0.14673	$6.82
20	0.14379	$6.95
40	0.12126	$8.25

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 14-R

Rebuttal Testimony of
Courtney T. Mann

Topics Addressed:
Fixed Monthly Customer Charge
OPEB Surcredit
FPFTY Revenue Adjustments
Revenue Allocation

Dated: May 12, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Courtney T. Mann. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. Did you previously submit testimony in this proceeding on behalf of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company")?

A. Yes. I submitted my direct testimony, National Fuel Statement No. 14, on January 28, 2026.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your rebuttal testimony.

A. I am addressing statements and recommendations by the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), the Office of Consumer Advocate ("OCA"), and the Bureau of Investigation and Enforcement ("I&E") regarding the residential fixed monthly customer charge, $30 one-time bill credit to low-income customers, forfeited discounts and rent from gas property revenue adjustments, and allocation of the proposed revenue increase.

Q. Are you sponsoring any exhibits with your rebuttal testimony?

A. No. Company witness Donald Koch provides an update to revenue requirement in National Fuel Statement No. 2-R. While this update impacts revenues at proposed rates,

bill impacts and certain elements of the originally proposed rate design, I am not sponsoring updated exhibits at this time.

III. FIXED MONTHLY CUSTOMER CHARGE

Q. Do you agree with CAUSE-PA's statement on page 4 and 5 of Mr. Geller's testimony that NFG's proposed increase to the residential fixed monthly charge is "massive"?

A. No. The Company does not agree with this subjective characterization. As explained in my direct testimony, the proposed increase of $5 from $14 to $19 to the residential customer charge is less than half of the amount recommended by the Allocated Cost of Service Study ("ACOSS"), as discussed in Sections III and IV of the rebuttal testimony of John D. Taylor. The Company has only increased this charge once in nearly 20 years. Additionally, the proposed fixed monthly charge is in line with other Pennsylvania gas utilities, including the $20.16 rate recently authorized by the Pennsylvania Public Utility Commission for Columbia Gas of Pennsylvania, Inc.

IV. OPEB SURCREDIT

Q. Does the Company agree with CAUSE-PA recommendation on page 69 of Mr. Geller's testimony to distribute the $30 one-time credit to low-income customers during a winter month (December – March)?

A. Yes. The Company agrees to distribute the one-time bill credit to low-income customers during the December 2026 billing cycle.

V. FPFTY REVENUE ADJUSTMENTS

Q. Does the Company agree with OCA's proposed adjustment to increase Forfeited Discounts by $25,000 in the fully projected future test year ("FPFTY"), as presented by Mr. Morgan?

A. No. First, the magnitude of OCA's adjustment is tied to its recommended revenue increase. As detailed by Company witness Donald Koch, there is a considerable gap between the revenue requirement proposed by the Company and OCA. Next, I do not agree with Mr. Morgan's use of a three-year average. Fiscal year 2024 late payment charges were unusually high and are not representative of expectations for the FPFTY. The Company's use of a trailing twelve-month weighted average is more appropriate. OCA's calculation divides actual late payment charges by sales revenues for each year to produce the average late payment charge factor used in its adjustment. This calculation improperly excludes transportation revenue, to which late payment charges are applied. If the Commission were to adopt OCA's proposed three-year average, the appropriate factor using total billed revenue would produce a 0.518% forfeited discount factor as opposed to the 0.611% presented by OCA. Ultimately, I recommend that the adjustment to late payment charges at proposed rates reflect the final revenue requirement approved by the Commission in this proceeding.

Q. Does the Company agree with OCA's adjustment to increase Rent From Gas Property by $12,000 in the FPFTY presented by Mr. Morgan?

A. No. The Company disagrees with Mr. Morgan's adjustment of $12,000 to Rent From Gas Property. There are no known or measurable changes to support an additional increase in

Rent From Gas Property. The Company reviewed the most recent intercompany rent amounts and determined that the ongoing monthly rent is $8,258, which on a full year basis yields $99,096. This amount is in line with what the Company presented in its direct case and demonstrates that Rent From Gas Property has remained relatively flat. Therefore, OCA's historical average growth factor to increase Rent From Gas Property would be inappropriate.

VI. REVENUE ALLOCATION

Q. Does the Company agree with I&E's recommended revenue allocation on page 12 of Mr. Cline's testimony?

A. No. The Company does not agree with I&E's recommended revenue allocation. Please refer to John Taylor's rebuttal testimony, National Fuel Statement No. 19-R, for the Company's response regarding revenue allocation.

Q. Does this conclude your rebuttal testimony at this time?

A. Yes.

NATIONAL FUEL STATEMENT NO. 15

WANYA' D. BRUCE

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 15

Direct Testimony of
Wanya' D. Bruce

Topics Addressed: Tariff Revisions

Dated: January 28, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Wanya' D. Bruce. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. By whom and in what capacity are you employed?

A. I am employed as a Rate Analyst in the Rates & Regulatory Affairs department of National Fuel Gas Distribution Corporation ("NFGDC").

Q. Please provide your educational background.

A. I graduated from D'Youville University in May 2020, with a Bachelor of Science degree in Business Management.

Q. Please provide your professional experience.

A. I began my employment at Trusted Nurse Staffing in October 2020 as a Recruiter/Operations Analyst. In August 2022, I was promoted to Team Lead and continued in that role until September 2023. I then joined Systems Personnel as an Operations Coordinator in September 2023. In September 2024, I began my career with NFGDC as a Rate Analyst.

Q. Have you previously testified in other proceedings before the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission") or any other state or federal agency?

A. No.

Q. Please describe the purpose of your testimony.

A. I am testifying to proposed changes to the Company's tariff.

II. DESCRIPTION OF EXHIBITS

Q. Are you sponsoring any exhibits or filing requirements in this proceeding?

A. Yes, I am sponsoring National Fuel Exhibit F, which contains the Company's current and proposed tariffs. I am also sponsoring certain responses to the Commission's regulatory filing requirements that were prepared by me or under my direction. These regulations are indicated on the master list accompanying this filing.

Q. Please describe National Fuel Exhibit F.

A. National Fuel Exhibit F is composed of two sections pertaining to the Company's tariff. Section 1 provides the current tariff and Section 2 provides the proposed tariff associated with this rate case filing.

III. PROPOSED TARIFF CHANGES

Q. Provide a summary of the tariff changes being proposed in this case.

A. Administratively, the Company is revising various tariff pages to update the supplement number, issued and effective dates, and page numbers as made necessary by the rate changes and proposals discussed by the Company's witnesses. A complete list of tariff modifications can be found in the "List of Changes Made by the Supplement" section in

National Fuel Exhibit F – Proposed Supplement 294 to NFGDC Gas Tariff No. 9.

Notable proposed changes to the tariff supported by other Company witnesses include:

- Base rate updates necessary to implement the Company's proposed rate design discussed in the Direct Testimony of Courtney T. Mann (National Fuel Statement No. 14). Ms. Mann also supports the following items that result in tariff changes:
    - In accordance with the Company's current tariff (Page No. 175), the Distribution System Improvement Charge ("DSIC") rate has been reset to zero in the Company's proposed tariff, excluding any potential E-factor rate.
    - In accordance with the Company's current tariff (Page No. 157), the State Tax Adjustment Surcharge ("STAS") rate is to be recomputed whenever the Company makes effective an increase or decrease in base rates. The STAS has been reset to 0.00% at proposed rates.
    - The Company proposes updates to Rider G – Merchant Function Charge ("MFC") Rider (Page No. 168) to coincide with associated changes in its cost of service since its prior base rate case.
    - The Company has updated its tariff (Page No. 12) that establishes the factors for justified Company investment per dollar of additional annual revenue relating to the upgrade/extension of facilities.
- Operational procedure changes involving customer premise access as discussed in the Direct Testimony of Jason Scouten in National Fuel Statement No. 16.
- Implementation of an Energy Efficiency Program discussed in the Direct Testimony of Erik M. Solomon in National Fuel Statement No. 18. Costs associated with the

program are proposed to be recovered from residential customers through a new Rider D to the Company's tariff.

- Modifications to the Daily Metered Transportation aggregation program, as discussed in the Direct Testimony of Daniel J. Czechowicz in National Fuel Statement No. 20.

Q. Are there any other tariff changes that you'd like to discuss?

A. Yes. The Company's current tariff includes separate transportation rate designations - one for gas produced within the Commonwealth of Pennsylvania ("intrastate") and one for gas produced outside the Commonwealth ("interstate"). The intrastate and interstate rates are the same for each transportation rate schedule and have been since at least the Company's 2006 base rate case. The Company does not consider this intra/interstate designation in its rate design and has no intention of doing so in the future. In an effort to streamline the tariff, the proposed tariff consolidates the intrastate and interstate rates into a single rate for each transportation service class. The effect of this proposal can be seen on proposed tariff Page Nos. 100, 101, 111, and 112.

Q. Does this conclude your direct testimony at this time?

A. Yes, it does.

NATIONAL FUEL STATEMENT NO. 16

JASON C. SCOUTEN

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 16

Direct Testimony of
Jason Scouten

Topics Addressed:
System Overview
Safe and Reliable Service
System Integrity and Damage Prevention
Construction Execution
Operations Performance Metrics
Initiatives

Dated: January 28, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Jason Scouten. My business address is 225 Wayne Street, Erie, Pennsylvania 16507.

Q. By whom and in what capacity are you employed?

A. I am currently employed by National Fuel Gas Distribution Corporation ("NFGDC") as the Superintendent of NFGDC's Pennsylvania Division Operations department. NFGDC has two divisions: its Pennsylvania Division ("National Fuel" or the "Company"), which is a public utility regulated by the Pennsylvania Public Utility Commission ("PAPUC" or "Commission") and its New York Division ("National Fuel – NY"), which is a public utility regulated by the New York Public Service Commission ("NYPSC").

Q. Please provide your educational background.

A. I hold a Bachelor's degree in Construction Engineering and Surveying Technology from the University of Akron, as well as an Associate's degree from Penn State Behrend in Mechanical Engineering Technology.

Q. Please provide your professional experience.

A. I have a deep range of professional experience in the natural gas industry, amassed both in the field and from my education and learnings from trade and industry associations. Most pertinently, I note that I have a deep understanding and knowledge of NFGDC's operations, having started at the Company in 2005 as an Operations Supervisor.

Through the years, I have gained an increasing number of managerial and strategic opportunities as I have grown at the Company and held the title of Superintendent since 2022.

Q. What are your responsibilities as Superintendent of the Company? [1]

A. As Superintendent, I am responsible for the operation, maintenance, and enhancement of the Company's transmission and distribution systems located in its Pennsylvania service territory (the "Service Territory"). More specifically, through my oversight of Operations, I am charged with, among other things:

- The delivery of safe and reliable natural gas distribution service to the Company's customers.
- Leak detection, leak investigation, leak response, and leak repair activities, including all required leakage surveys and system inspections, testing and inspection of cathodic protection systems for steel facilities;
- Plant operations and system regulation;
- The day-to-day operations of the Company's physical natural gas distribution system ("Distribution System" or "System");[2]
- Field customer service to the Company customers including, among other things, odor complaints, meter turn-ons and turn offs, and all other customer interfacing field interactions;

[1] All references in my testimony to "Superintendent" or to "the Company's Operations"/ "Operations" shall refer to "Superintendent of the Company's Pennsylvania Division" and to "the Company's Pennsylvania Division Operations," respectively, unless the context indicates contrary.

[2] All references in my testimony to the Company's "Distribution System" or "System" (and related operations) shall refer to those located within the Company's Pennsylvania Division.

- Dispatch and emergency response; and
- Installation and replacement of natural gas mainline, service line, and other facilities, as necessary in connection with the operation of the Company's System.

Q. Have you previously testified in other proceedings before the Commission or any other state or federal agency?

A. Yes, I testified on behalf of National Fuel in Docket No. R-2022-3035730.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your testimony.

A. The purpose of my testimony is to describe Operations' role in the safe and reliable operation of the System. My testimony addresses the characteristics of the Company's System and Service Territory and explains the operational and field-execution considerations that affect how the System is operated and maintained.

My testimony is intended to provide an understanding of the operational demands facing the Company and the resources required to meet applicable safety, reliability, and regulatory obligations. I will also discuss the operating performance of the Distribution System, as measured by various metrics and benchmarks and the initiatives and actions the Company has taken to increase the operating performance of its Distribution System.

Q. Are you sponsoring any exhibits or filing requirements in this proceeding?

A. I am sponsoring National Fuel Exhibit JCS-1.

III. DISTRIBUTION SYSTEM & SERVICE TERRITORY OVERVIEW

Q. Please describe the Company's Distribution System.

A. Currently, the Company serves approximately 213,000 customers (including residential, industrial and commercial customers). The Company owns and operates its Distribution System, which is spread throughout fourteen (14) counties and serves over 230 municipalities throughout northwestern Pennsylvania. More specifically, the Company's Distribution System consists of: (a) approximately 4,900 miles of distribution and transmission mains; (b) nearly 194,000 services that it owns, operates, and maintains; and (c) related facilities (collectively, "Facilities"). The Company's Distribution System has been built over many decades and includes a wide range of materials. A more detailed description of the system is provided in the Company's Long Term Infrastructure Improvement Plan ("LTIIP"), which was approved by the Commission in December 2022, as well as in the pending petition to modify the LTIIP.[3] As discussed in those filings, the System includes distribution and transmission mains constructed from different materials and installed over different time periods.

From an Operations perspective, these Facilities require ongoing inspection, maintenance, monitoring, and field support to ensure safe and reliable service. Operations personnel are responsible for executing these day-to-day maintenance activities, responding to system conditions and emergencies, and supporting construction and replacement work affecting these decisions.

As more fully noted in the Direct Testimony of Mark C. Schaefer in National Fuel Statement No. 9, consistent with its Distribution Integrity Management Program

[3] The Company's Commission-approved LTIIP and the pending Petition for Approval of a Major Modification to LTIIP (filed on December 11, 2025) is found at Docket No. 2022-3034957.

("DIMP") and LTIIP, the Company has developed specific programs to target the retirement and replacement of various types/vintages of Facilities. Operations personnel are responsible for implementing that work safely and efficiently in the field in accordance with applicable standards and regulatory requirements.

Q. Can you describe the nature of the Company's Service Territory?

A. The Company's Service Territory includes a mix of rural and urban areas with varying population densities, geographic characteristics, and infrastructure configurations. While the Distribution System serves several population centers (*e.g.*, Erie, Meadville, and Sharon), a significant portion of the service territory is rural in nature, with facilities extending across rural communities with less densely populated areas.

Q. How does the nature of the Company's Service Territory impact the Company's operations?

A. The varied nature of the Company's Service Territory affects how Operations activities are planned and executed. Differences in population density, access, distance, and local conditions influence field personnel deployment, response planning, and coordination of field work. Operations staffing and work practices are structured to address the differing conditions present across rural and urban portions of the Service Territory.

Q. What operational challenges does the Company face with respect to rural portions of its Service Territory?

In rural portions of the Service Territory, Operations personnel must account for longer travel distances, reduced access, more complicated terrain and environmental permitting conditions, and fewer cost-justified routing options for new or natural gas facilities approaching retirement. These factors can affect response times, logistics, the coordination of maintenance and construction activities.

Q. How does Operations respond to these challenges in the rural portions of its Service Territory?

A. Operations staffing and dispatch practices are designed to address challenges while ensuring safe and reliable service. Service territories are sized proportionally to customer density and work volumes, with travel distances also considered. Occasionally, these areas may experience strain during operational situations or an influx of work volumes such as heavy One Call volumes, requiring additional support. To mitigate this, neighboring service centers are strategically positioned to provide assistance and respond to customer needs and emergencies. Additionally, contractors can be dispatched as needed to support construction activities within the area.

Q. What operational challenges does the Company face with respect to urban portions of its Service Territory?

A. In urban areas, Operations activities are influenced by higher customer density, traffic congestion, municipal permitting coordination, and access limitations associated with buildings and infrastructure. Field work in urban settings often requires intricate

coordination with municipalities, contractors, and customers to safely perform maintenance and construction activities while minimizing disruption.

Q. How does the Company respond to these challenges in the urban portions of its Service Territory?

A. Operations staffing and dispatch practices are designed to address challenges inherent in urban portions of its Service Territory and maintain safe and reliable service. Urban areas typically have a more concentrated workforce but face unique challenges during emergency responses, which often impact a larger number of customers and the public. Additional measures such as business district patrolling and public building inspections are necessary to ensure safety. Project coordination in urban environments requires collaboration with multiple entities to protect employees, customers, and the public. These projects often demand increased resources for excavation and traffic control to maintain safety and minimize disruptions.

IV. OPERATIONS' ROLE IN PROVIDING SAFE & RELIABLE SERVICE

Q. Please describe how the Company's Operations are organized to support the operation and maintenance of the Company's Distribution System.

A. Operations is responsible for the day-to-day field execution associated with the Company's Distribution System. The department is led by a Superintendent, who reports directly to an executive. The Superintendent is supported by an Assistant Superintendent and several Operations Managers, who are geographically located throughout the Service Territory.

Operations Managers are assigned to one or more of thirteen (13) service centers located throughout the Service Territory. Each Operations Manager oversees operational activities within the geographic area served by his respective Servicenter, including supervision of field personnel and coordination of day-to-day work. Field personnel include both Company employees and contractors. Contractors may assist with tasks such as line locating or leak surveying when needed but primarily handle construction projects. This approach allows Company employees to remain flexible and shift into areas where and when they are most needed.

Q. Please describe the Company's service centers and their role in maintaining the Distribution System.

A. The Company's key Operations personnel and equipment are primarily located in the thirteen (13) service centers spread strategically throughout the Service Territory. These service centers serve as the primary operational hubs for field personnel, equipment, and materials used in the operation and maintenance of the Distribution System. As noted above, the location of each service center is determined based on geographic considerations, population density, System configuration, and operational needs within the surrounding service area. This structure allows Operations personnel to be positioned in reasonable proximity to customers, facilities, and system assets across both urban and rural portions of the service territory. By distributing service centers across the service territory in this manner, the Company deploys field personnel efficiently to address routine operational activities, respond to system conditions, and emergency response. Moreover, the geographic placement of service centers supports timely response to

customer service calls, leak reports and surveys, and other field conditions, while also facilitating effective coordination with local emergency responders and municipalities. Additionally, the Company maintains labor agreements where field personnel are assigned to "standby duty" during off-hours, which enables rapid emergency response on a continuous, 24-hour basis, each day.

Q. How many employees currently staff the Company's Operations?

A. As of September 2025, the Company's Operations is staffed by 268 employees. These employees perform a range of field, supervisory, and support functions associated with the operation and maintenance of the Company's Distribution System.

Q. How has Operations staffing changed in recent years?

A. Operations staffing levels have increased modestly over the past several years. Since 2021, Operations headcount has increased by approximately 6%. The increased headcount has been added incrementally over time rather than through significant year-over-year changes. Annual Operations headcount is shown below in Table 1.

Table 1: Operations Headcount by Fiscal Year

Fiscal Year	**2021**	**2022**	**2023**	**2024**	**2025**
Headcount at September 30th	253	263	262	264	268

Q. In addition to the Company employees, how does the Company utilize contractors within Operations?

A. In addition to its Operations employees, the Company utilizes contractors on a targeted basis to support specific operational and construction-related activities. Contractor resources are primarily engaged to manage project-based work, address temporary workload fluctuations, and perform specialized tasks that do not require permanent staffing. While contractors typically handle larger capital projects during seasonal periods when construction is most advantageous, they also provide support for smaller, time-sensitive projects that arise during high-demand periods, such as during the heating season. Contractors working on the Distribution System operate under the direction and oversight of the Company personnel and are subject to applicable qualifications, coordination, and oversight requirements.

Management evaluates the use of contractors as part of its overall workforce planning approach. Rather than expanding permanent headcount in response to short-term, seasonal or cyclical increases in work volume, the Company elects to strategically leverage contractors where appropriate to maintain operational flexibility and align resources with project demands. The Company has managed costs and maintained a balanced approach to operations. However, it is important to emphasize that contractor utilization does not replace the need for adequate Operations staffing. Sufficient staffing is essential to ensure effective oversight, coordination, high-quality customer service, and timely emergency response.

Q. What are the operational consequences if Operations staffing is not maintained at current levels?

A. First, reduced staffing would limit Operations' capacity to respond promptly to day-to-day operational demands across the Service Territory, including service work, inspections, construction support, emergency response and line locating activities. As workloads fluctuate or peak, fewer available personnel would increase response times and reduce scheduling flexibility, particularly in geographically dispersed or higher-demand areas.

Second, reduced staffing levels would increase the likelihood that certain inspection, maintenance, and integrity-related activities are deferred or rescheduled. While such work would continue to be prioritized and managed, sustained staffing constraints would place greater strain on planning and execution, increasing the risk of backlog development over time.

Third, staffing reductions would diminish Operations' ability to provide effective field oversight and coordination, including supervision of contractor activities, quality assurance, and interdepartmental coordination. This oversight function is critical to ensuring work is performed efficiently, consistently, and in accordance with applicable procedures and requirements.

Finally, taken together, these impacts would increase overall operational strain on Operations and reduce operational resilience. Maintaining current staffing levels allows Operations to balance routine workload demands with unplanned events, seasonal variability, and system complexity in a manner that supports reliable and effective operation of the Distribution System.

V. OPERATIONS' ROLE IN DISTRIBUTION SYSTEM INTEGRITY MANAGEMENT, LEAK RESPONSE AND EXCAVATION-RELATED RISK

Q. What is the Company's DIMP?

A. As explained in the Direct Testimony of Mark C. Schaefer in National Fuel Statement No. 9, the Company's DIMP is a federally required, risk-based framework that governs how the Company identifies, evaluates, and mitigates threats to the integrity of its natural gas distribution system. DIMP requires operators to continually assess integrity risks and to implement measures to reduce both the likelihood and consequences of system failures. Federal legislation, including the Protecting Our Infrastructure of Pipelines and Enhancing Safety Act of 2020 ("PIPES Act") and related implementing regulations from the Pipeline and Hazardous Materials Safety Administration ("PHMSA"), has expanded integrity management and leak-related obligations applicable to natural gas distribution operators, increasing the scope and intensity of required inspection, response, and documentation activities.

Q. From an Operations perspective, how does DIMP affect day-to-day execution and resource requirements?

A. From an Operations perspective, DIMP establishes non-discretionary execution obligations. These obligations drive leak detection and response activities, integrity-driven infrastructure replacement, the development and execution of the Company's damage prevention program, and the management of excavation-related integrity risk. Operations personnel are responsible for carrying out these requirements through daily field execution across the Service Territory.

A. Integrity Threats and Leaks

Q. What integrity threats are most significant to the Company's Distribution System under DIMP?

A. The most significant integrity threats to the Distribution System include system leaks, aging or higher-risk facilities, and third-party excavation activity. These threats are evaluated collectively under DIMP, recognizing that they often interact. For example, excavation activity may result in immediate damage or latent conditions that later manifest as leaks, increasing integrity risk if not promptly identified and addressed.

Q. How does leak detection, classification, and response support the Company's integrity objectives under DIMP?

A. Leak detection and response are core components of DIMP execution for which Operations is responsible. More specifically, Operations personnel perform required system surveys, investigate reported conditions, classify leaks, and complete repairs or replacements as necessary. Leak response activities include the investigation, classification, and prioritization of leaks in accordance with applicable federal and state requirements, including differentiated response timelines based on leak severity. These activities directly reduce integrity risk and prevent escalation of System conditions.

Q. How does leak response activity affect Operations workload, dispatch, and resource planning?

A. Leak response requires trained personnel, timely dispatch, field investigation, coordination with other departments, and follow-up work. These activities must be performed alongside routine maintenance, construction oversight, and emergency response obligations. As a result, leak management represents a significant and ongoing driver of Operations workload and staffing requirements.

Q. What do the Company's leak-related performance metrics demonstrate regarding the effectiveness of integrity execution?

A. The Company's leak performance has shown sustained improvement over time. In this regard, since 2005, the number of leaks on the Company's Distribution System have trended favorably dropping from 2,622 reported in 2005, compared to 915 reported in 2024 with hazardous leak reduced from 810 to 363 in the same time period. Additional information and trend information is listed in the Company Exhibit JCS-1, which I am sponsoring through this testimony. These trends demonstrate the effectiveness of enhanced leak response practices and integrity-driven infrastructure replacement in reducing leak incidence across the Distribution System.

B. <u>Infrastructure Replacement and Integrity Risk Reduction</u>

Q. How does infrastructure replacement under the LTIIP support the Company's DIMP objectives?

A. As more fully described in the Direct Testimony of Mark C. Schaefer (National Fuel Statement No. 9), the Company's LTIIP operationalizes DIMP by targeting the replacement of facilities with higher integrity risk based on factors such as material type,

age, operating conditions, and leak history. Replacement priorities are informed by DIMP evaluations and are intended to reduce future leak potential and overall integrity risk on a sustained basis.

Q. What responsibilities does execution of the LTIIP create for Operations?

A. Execution of the LTIIP increases operational workload through planning, permitting, construction, construction oversight, inspections, coordination with contractors, municipalities, and customers, leak follow-up, and post-construction verification. Replacement mileage targets through 2027 are reflected in Table 2, illustrating the scale of integrity-driven work requiring ongoing support from Operations staffing.

Table 2: Leak Prone Pipe Replacement Targets by Year

	Pre-LTIIP Years		LTIIP Years				
Year	**2021**	**2022**	**2023**	**2024**	**2025**	**2026**	**2027**
Miles of Main Replaced	43	41	48	52	53	54	57

C. Responding to Threats from Third Parties: Excavation Activity and the Company's Damage Prevention Program

Q. Why is third-party excavation activity treated as a significant integrity threat under the Company's DIMP?

A. Third-party excavation activity is one of the most significant external threats to distribution system integrity. Excavation can result in line strikes, near misses, or latent damage that may not be immediately apparent. Accordingly, excavation activity is evaluated and managed under DIMP as an ongoing integrity risk requiring active mitigation.

Q. What activities and operational functions are encompassed within the Company's damage prevention program?

A. The Company has developed a comprehensive damage prevention program designed to manage excavation-related integrity risk. Damage prevention activities include ticket processing and facility locating, field coordination and education with excavators, post-damage investigations, documentation and reporting, and supervisory oversight. These activities require significant field presence and coordination and must be performed regardless of whether excavation ultimately results in damage. The damage prevention program is an integral component of the Company's overall integrity management approach. Additionally, continuous improvement efforts such as the development and deployment of technology, such as GPS tools to, among other things, more accurately map pipeline facilities, identify areas where line locating is challenging, and continuously update the Company's GIS maps and records, are part of the Company's damage prevention efforts.

Q. What do the Company's damage prevention performance metrics demonstrate regarding its ability to reduce excavation-related damages over time?

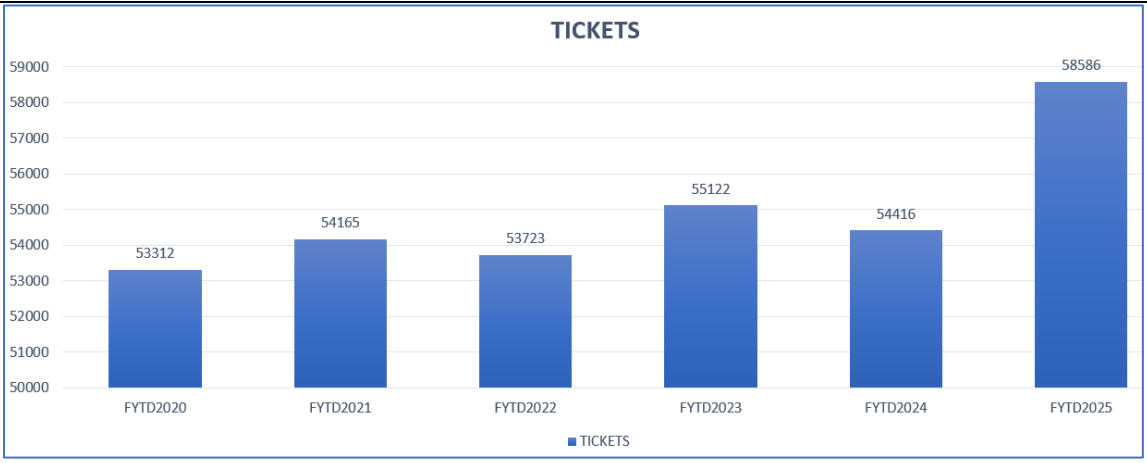
A. The Company's damage prevention performance has improved over time. In this regard, in calendar year 2024, the Company experienced 137 total number of excavation damages or 2.46 line hits per 1,000, compared with 208 excavation damages or 4.56 line hits per 1,000 in calendar year 2015. This translates to a 46% reduction in line hits over that time period. Based on information through September 30, 2025 (the close of the

Company's last fiscal year), Operations logged reduced line hits, compared to the prior year. These results demonstrate the effectiveness of the Company's damage prevention program and its ability to put ratepayer resources to work in reducing excavation-related integrity risk.

Q. What factors have increased excavation-related operational demands in recent years?

A. Operations has experienced increases in Pennsylvania One Call ticket volumes driven by elevated construction activity stemming from, among other things, widespread broadband and fiber deployment (due, in part, to availability of federal funding for same) as well as water and sewer infrastructure projects. These trends are show in Figure 1 below:

Figure 1: One Call Ticket Volumes Per Year



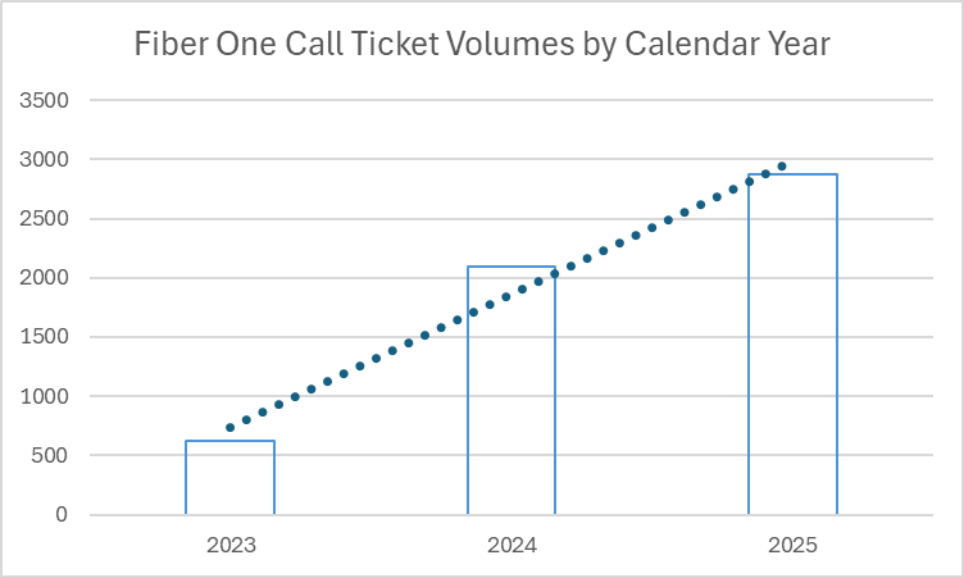
Note: Trends are expressed in terms of "Fiscal Year to Date," with the fiscal year measured from October 1 – September 30.

In sum, the increased ticket volume and coordination translate to higher demands for locating, coordination, and field oversight.

Q. How has increased broadband and fiber deployment affected excavation risk and Operations workload?

A. From the Company's experiences, broadband and fiber projects present several challenges, including that: (a) such projects are often scheduled for completion on an accelerated timeframe; (b) lack project design and coordination; (c) involve multiple excavation contractors and subcontractors; and (d) present additional challenges surrounding expired or inaccurate locate tickets from the project owner/excavators. These conditions increase excavation-related integrity risk and require additional Operations oversight and repeated line locating efforts, even when no damage ultimately occurs. Additionally, the number of projects has increased immensely in the Company's service territory. Figure 2 illustrates the increase in One Call ticket volumes from calendar years 2023 to 2025 for broadband expansion projects.

Figure 2: Fiber One Call Ticket Volumes by Calendar Year



Q. What are the operational consequences if these integrity-related activities described in this section of your testimony are not adequately supported?

A. If the integrity-related activities, such as those identified in this section, are not adequately supported, Operations would face delayed leak response, deferred integrity work, increased excavation-related risk, and reduced ability to oversee construction and contractor activity. Over time, these conditions would place additional strain on Operations personnel and increase compliance and reliability risk. Maintaining adequate staffing, tools, equipment, and technology is therefore necessary to sustain effective execution of the Company's integrity obligations.

VI. CONSTRUCTION

Q. What types of construction-related activities does the Company's Operations support and help execute or coordinate?

A. Operations supports and coordinates two general categories of construction-related activities affecting the Company's Distribution System: (1) capital construction activities, and (2) routine operations and maintenance ("O&M") construction work. Capital construction activities include integrity-driven system replacement projects, system upgrades, relocations, customer-related expansion work, and other larger-scale projects affecting distribution and transmission facilities. These activities are typically planned and scheduled through the Company's engineering and planning functions and implemented in the field with Operations support. Routine O&M construction work includes smaller-scale activities such as leak remediation, localized mainline and service work, inspections, regulator and meter station work, service installations, and other

system maintenance activities necessary to support safe and reliable operation of the Distribution System.

Q. How does Operations support and coordinate construction activities affecting the Distribution System?

A. Operations personnel support and coordinate construction activities by providing field-level oversight, coordination, and inspection throughout the duration of a project. This includes coordinating work sequencing, performing inspections and quality assurance reviews, overseeing contractor activities, managing traffic control and site coordination, and interfacing with customers, municipalities, and other stakeholders affected by construction activity. Operations also coordinates construction activities with ongoing system operations to minimize service impacts and ensure that work is performed in accordance with applicable Company procedures, operating standards, and regulatory requirements. Through these functions, Operations plays a central role in the effective execution of construction work affecting the Distribution System.

VII. OPERATIONAL PERFORMANCE

Q. Having described the Company's integrity obligations and how related work is executed in the field, how does the Company evaluate the operational performance of its Distribution System?

A. The Company evaluates the operational performance of its Distribution System using objective performance metrics that reflect emergency response capability, system reliability, and safety outcomes. These metrics are used to assess how effectively the

Operations executes its responsibilities and maintains safe and reliable service for customers and the public.

A. Emergency Response Performance

Q. How does the Company measure emergency response performance?

A. Emergency response performance is measured by tracking response times to reported emergency conditions, including gas odor calls and other events requiring immediate field response. These metrics are used to evaluate the Company's ability to respond promptly and effectively to system conditions across the Service Territory.

Q. How has the Company performed with respect to emergency response times?

A. The Company has consistently met its emergency response performance targets. Over the past three fiscal years (October 1 – September 30), from 2023 through 2025, the Company has responded to more than 19,000 emergency calls, answering 99.5% of them within 45 minutes. The Company achieved an average response time of under 20 minutes. These metrics demonstrate a high level of emergency readiness and field execution capability.

Q. What does this level of emergency response performance indicate about Operations execution?

A. This level of performance reflects effective dispatch practices, field coordination, and geographic deployment of Operations personnel and resources throughout the Service Territory. Maintaining this performance requires continuous readiness and coordination

across both urban and rural operating areas, strategic positioning of Company personnel and assets, and continued focus on overall emergency readiness and training.

B. System Reliability

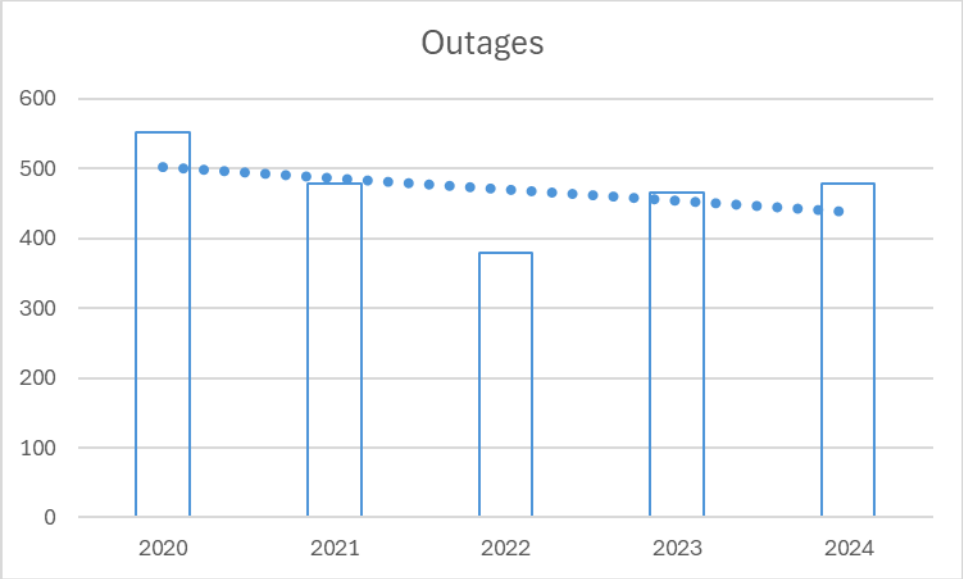
Q. How does the Company evaluate the reliability of its Distribution System?

A. System reliability is evaluated using performance metrics that track service interruptions, unplanned outages, and the continuity of gas service to customers. These metrics provide insight into how well the Distribution System performs under normal operating conditions and during unplanned events.

Q. Using these metrics, how reliable is the Company's Distribution System, when measured by number of outages?

A. The total number of customer outages in calendar years 2020-2024, respectively was 551, 479, 379, 465, and 478 with an average of 470 per year. The data suggests that the number of outages has trended downward during that time period. This information is depicted in Figure 3 on the following page.

Figure 3: Customer Outages by Calendar Year



Q. What do the Company's reliability metrics demonstrate?

A. The Company's reliability metrics demonstrate stable and reliable system performance over time. Service interruptions are infrequent, and when interruptions occur, they are addressed promptly through coordinated Operations response and restoration efforts.

Q. How do integrity-driven activities support system reliability?

A. Integrity-driven activities, including proactive maintenance, damage prevention efforts, leak response, and infrastructure replacement, reduce the likelihood of unplanned service interruptions and contribute to sustained system reliability. These activities support long-term performance by addressing system conditions before they escalate into outages.

C. Safety and Incident Trends

Q. How does the Company track safety-related operational outcomes?

A. The Company tracks safety-related operational outcomes using incident data and trend analysis, including OSHA-recordable incidents and other system-related events. These metrics are used to assess operational outcomes rather than individual programs or initiatives.

Q. What trends are observed with respect to OSHA-recordable incidents over time?

A. The Company has experienced a reduction in Occupational Safety and Health Administration ("OSHA") recordable injuries from fiscal year 2010 through fiscal year 2025, reflecting improved operational outcomes associated with integrity management, field execution, and operational controls. This decline is shown in Table 3 below, which lists the OSHA Total Recordable Incident Rate ("TRIR") as well as total injuries and hours worked in 2010 and 2025, respectively.

Table 3: OSHA Total Recordable Incident Rate

Fiscal Year Ended September 30	2010	2025
TRIR	5.57	3.25
Injuries	18	13
Hours Worked	646,595	799,351

Q. How should OSHA-recordable incident trends be interpreted in the context of Operations performance?

A. These trends demonstrate effective execution of operational responsibilities and sustained attention to system conditions. While individual incidents can still occur, the overall trend indicates improved safety outcomes consistent with the Company's integrity-driven approach to system operation.

As discussed below, the Company's tariff provision on safe access to customer premises is intended to strengthen employee safety, particularly given that dog bites remain a leading source of field related injuries. The provision requires customers to securely restrain pets, especially dogs, before employees perform meter reading, service work, inspections, or emergency response. This measure helps prevent injuries, reduces lost work time, and supports timely service delivery.

The tariff requirement reflects the Company's commitment to safety and risk mitigation. Combined with employee training and enhanced customer communication, it serves as a critical safeguard to minimize preventable incidents and maintain a safe working environment for field personnel

D. <u>Customer Service</u>

Q. How does the Company measure operational performance related to customer appointments?

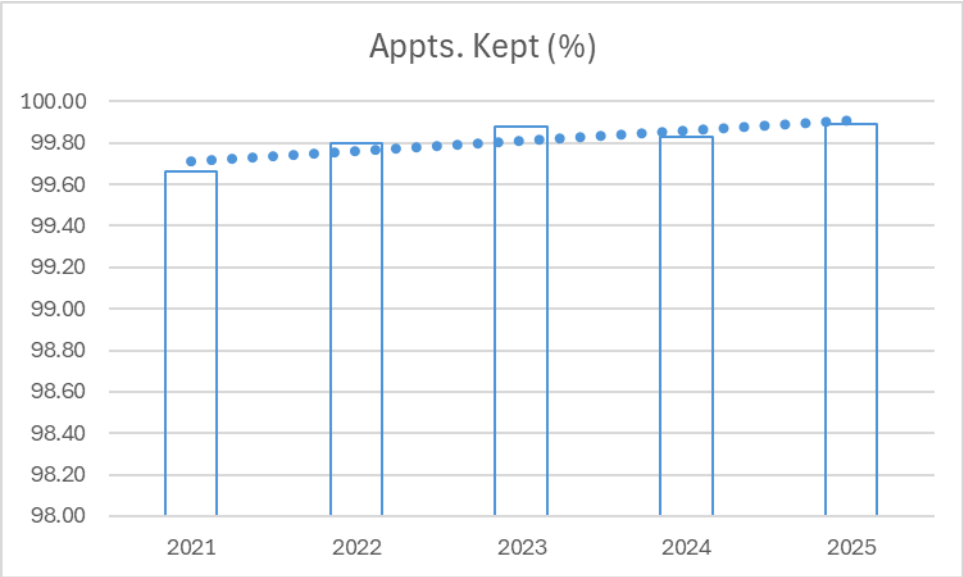
A. One of the key operational performance metrics tracked by the Company is "Appointments Kept," which measures the percentage of scheduled customer appointments completed as played by Operations personnel. This metric is driven by workforce planning, dispatching, and field execution within Operations.

Q. How has the Company performed with respect to this metric?

A. As shown in the Figure 4, the Company has consistently achieved appointment completion rates exceeding 99.8% over the past four fiscal years, improving to 99.89% in

Fiscal Year 2025, despite increased workload and expanded safety and compliance obligations.

Figure 4: Appointments Kept by Fiscal Year



Q. Why is this performance relevant to highlight in your testimony?

A. In addition to the fact that high appointment completion rates reduce the need for repeat visits, redispatches, and customer the need to redispatch Company personnel, thereby controlling Operations labor costs and inefficiencies, it also facilitates a favorable customer service experience for customers.

E. Role of Performance Metrics

Q. How are these operating performance metrics used by the Company?

A. Operating performance metrics are used by management to monitor system outcomes, identify areas requiring attention, and evaluate the effectiveness of field execution.

These metrics provide an objective basis for assessing Operations performance and ensuring continued focus on safe and reliable service.

Q. What do these operating performance results demonstrate regarding the prudence and effectiveness of the Company's management of its Distribution System?

A. These operating performance results demonstrate that the Company's management has effectively implemented integrity, operational, and emergency response obligations in a disciplined and consistent manner. Sustained achievement of emergency response standards, stable system reliability, and improving safety outcomes reflect prudent operational decision-making, effective deployment of resources, and ongoing management oversight. These outcomes are consistent with reasonable and responsible management of the Distribution System in the public interest.

VIII. OPERATIONAL TOOLS AND TARIFF PROVISIONS SUPPORTING EFFICIENT SYSTEM MANAGEMENT

Q. In addition to field operations and system execution, what tools and tariff provisions is the Company evaluating to support efficient and prudent management of its Distribution System?

A. In addition to its field operations and integrity management activities, the Company relies on and evaluates certain tariff provisions to support efficient and prudent management of the Distribution System, such as tariff provisions governing free access to its premises, as well as technology that may enhance operational visibility and system monitoring, such as advanced metering functionality. The Company evaluates such tools in light of system

characteristics, operational needs, cost considerations, and regulatory requirements to determine whether and when their use is appropriate.

Q. Why is access to customer premises important to the Operations' ability to perform its responsibilities?

A. Access to customer premises is necessary for Operations to perform required inspection, maintenance, leak response, repair, and emergency response activities affecting Company facilities. Timely access allows Operations personnel to evaluate system conditions, perform required work safely, and comply with applicable integrity and safety obligations.

Q. What challenges has the Company experienced with respect to access to premises?

A. In certain circumstances, Operations personnel encounter obstructed access, refusal of entry, or unsafe site conditions that delay or prevent the timely performance of required work. These situations can result in repeat visits, additional coordination, and delayed resolution of system conditions.

Q. How do such access limitations affect Operations efficiency and field execution?

A. Access limitations reduce operational efficiency by increasing the time and resources required to complete necessary work and by complicating scheduling and field deployment. Clear access authority supports more efficient execution of required activities and reduces avoidable operational delays.

Q. How does the Company propose to address access issues through the proposed amendment to Tariff Rule 8?

A. To address these matters, the Company is proposing to amend Rule 8 of its tariff (entitled "Access to Premises") to expressly clarify the conditions necessary to ensure that Company personnel have "free access" to customer meters and other Company-owned equipment located on customer premises. Complete text of the Company's proposed amendment to Tariff Rule 8 is found in National Fuel Exhibit F, which is sponsored by Wanya' D. Bruce in National Fuel Statement No. 15.

More specifically, the proposed amendment to Rule 8 adds language to make clear that "free access" includes not just physical denial of access to customer premises (e.g., meter behind locked door or customers not allowing Company personnel into their premises), but also means that Company personnel shall be free from unsafe or hazardous conditions when inspecting, repairing, removing, or reading its meters and facilities. The amendment to Rule 8 makes clear that, among other things, the presence of aggressive animals, significant insect or rodent infestation, the display or brandishing of firearms or weapons in a threatening manner, or the presence of excrement, debris, or other unsanitary conditions that may reasonably pose a threat to the safety or health of Company employees or agents.

Q. Why is clarification of access rights under Rule 8 appropriate at this time?

A. Clarification of access rights under Rule 8 would support Operations' ability to continue performing its responsibilities safely, efficiently, and consistently. Clear tariff language

helps ensure that required work can be performed without unnecessary delay while supporting prudent management of the Distribution System.

Q. Is the Company seeking recovery of costs or changes to rates through this tariff amendment?

A. No. The Company is not seeking recovery of additional costs or changes to rates. The requested clarification is intended solely to support effective and prudent execution of existing operational responsibilities.

Q. Are there any additional initiatives that you want to highlight at this time?

A. Yes, although very preliminary at this point but consistent with recommendations from the most recent Commission management audit, the Company is evaluating advanced and automated metering infrastructure ("AMI") technologies. The Company is working with an external consulting firm that specializes in metering systems to assess available technologies, potential operational impacts, and long-term planning considerations. This effort is focused on evaluation and planning to inform prudent future decision-making, rather than immediate system-wide deployment.

Q. Does this conclude your direct testimony at this time?

A. Yes.

NATIONAL FUEL EXHIBIT JCS-1

Exhibit JCS-1

Performance Measure	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Hazardous Leaks Eliminated or Repaired	810	767	813	630	618	574	575	517	533	659	615	513	461	557	463	420	392	369	392	363
Non-Hazardous Leaks Eliminated or Repaired	1812	1744	1454	1399	1465	1492	1070	1104	1058	1184	1175	1090	826	910	781	753	684	550	796	552
Total Leaks Eliminated or Repaired	2622	2511	2267	2029	2083	2066	1645	1621	1591	1843	1790	1603	1287	1467	1244	1173	1076	919	1188	915

Source

National Fuel Leak Database and Distribution Corporation Annual DOT Reports

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 16-R

Rebuttal Testimony of
Jason Scouten

Topics Addressed:
System Overview
Safe and Reliable Service
System Integrity and Damage Prevention
Construction Execution
Operations Performance Metrics
Initiatives

Dated: May 12, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Jason Scouten. My business address is 225 Wayne Street, Erie, Pennsylvania 16507.

Q. Did you previously submit testimony in this proceeding on behalf of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company")?

A. Yes. I submitted my direct testimony, National Fuel Statement No. 16, on January 28, 2026.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your rebuttal testimony.

A. I intend to provide my perspective in response to CAUSE-PA Statement No. 1 (Geller Direct) where Mr. Geller recommends the Public Utility Commission ("Commission") reject the new tariff language, OCA Statement No. 5 (Wise Direct) where Ms. Wise recommends the Company focus on increasing the completion rates of meter readings and addressing increases in customer outages, and I&E Statement No. 4 (Burket Direct) where Mr. Burket recommends the Company take positive steps to reduce restoration costs, break down replacement costs into multiple categories and track and analyze the independent costs, implement a pilot program using Smart Remote Methane Detection ("SRMD") in a geographic region, and consider using Advanced Metering Infrastructure ("AMI") technology and LoRaWAN or other communication network technology for the notification methodology in the proposed pilot. Mr. Burket additionally notes the New

York Division's experience with methane detector programs and pilots, and notes that the company is to file quarterly reports with the Commission at this docket, within 30 days of the end of each calendar quarter, beginning at the end of 2026 and ending at the end of 2031.

Q. Are you sponsoring any exhibits with your rebuttal testimony?

A. No.

III. TARIFF RULE 8 LANGUAGE UPDATE

Q. Do you agree with Mr. Geller's recommendation to reject the new tariff language or his characterization of the proposed language as "subjective," as described in his testimony?

A. No. Mr. Geller's testimony mischaracterizes the effect of the proposed Rule 8 language as introducing subjectivity. The Company's proposal does the opposite. By defining specific, observable safety conditions, the proposed revisions replace ambiguity with clear, objective, and consistently enforceable standards that establish when access is required and when safety conditions justify delay or refusal of service.

In this regard, Mr. Geller's testimony reflects a fundamental misunderstanding of the practical and unavoidable conditions under which National Fuel employees perform their duties. National Fuel personnel routinely must enter customer properties to inspect customer-owned gas systems and appliances, which are frequently located in basements or enclosed areas. These environments are often beyond the Company's control and, in

many cases, present serious health and safety risks, including unsanitary conditions, sewage exposure, and accumulated refuse, mold, and infestations.

These hazards are not speculative, theoretical, or vague. They are real-life threats and hazards that National Fuel's field operations team encounters in customer premises. As noted in my initial testimony, the Company's goal in adding additional detail to Rule 8 is not to substantively expand the universe of conditions which constitute "non-access," but to provide clarity, direction, and guidance on the same. The Company's position, therefore, is that when safety standards and access requirements are framed in general or undefined terms, customers and landlords may not understand that these conditions constitute legitimate safety risks that can limit or delay service; in other words, it fosters ambiguity with respect to the customers who do not understand what "access" under the tariff requires. Beyond leaving ambiguity for the customers, it also places National Fuel employees in the untenable position of confronting hazardous environments without advance mitigation, preparation, or customer / landlord accountability.

For these reasons, contrary to the assertions made in Mr. Geller's testimony, adding specificity, as National Fuel proposes in its update to Rule 8 facilitates both customer knowledge and expectations as well as protects Company personnel. To be sure, clearly defined safety conditions provide:

- Clear, intelligible standards which govern the basic expectations governing the compact between utility and customer (therefore providing clear expectations and responsibilities to customers and landlords that unsafe conditions inside private property such as those enumerated in the revised text of Rule 8 constitute a barrier to inspection or service;

- Objective criteria that employees can rely upon, reducing the need for onsite judgment calls in unsafe environments; and
- Consistent enforcement, which minimizes conflict and reduces the likelihood of confrontational or prolonged exposure situations.

By explicitly identifying conditions such as excrement presence, excessive debris or rubbish, insect or rodent infestations, or other biohazards as safety risks, the Company reduces confusion and provides greater certainty and understanding to property owners of the longstanding expectation that they are to maintain accessible and sanitary conditions to Company-owned facilities/meters in connection with receiving service from the Company. This also decreases the number of instances in which employees are sent into hazardous settings only to refuse work after arrival due to scenarios that unnecessarily increase exposure and risk.

Accordingly, the request for greater specificity under Rule 8 is not an attempt to expand utility discretion, but rather a necessary clarification that improves predictability, transparency, and safety outcomes. Failure to define these risks not only undermines employee protection, but also takes agency away from customers, as they are left without a shared understanding of what conditions are unacceptable and why.

Greater specificity therefore supports, rather than contradicts, the Commission's commitment to worker safety and reasonable, customer-understood utility practices.

IV. FOCUS ON METER READING RATES

Q. Do you agree with Ms. Wise's assessment on improving Meter Reading rates?

A. No. As an initial matter, comparing National Fuel's "meter reading" performance to other utilities is not exactly a clean "apples-to-apples" comparison because the Company has maintained a model that emphasizes in-person meter reads (in part to promote meter access and inspection). More specifically, the Company conducts meter reading through scheduled in person visits, during which company personnel physically inspect each meter. Although these visits can present logistical challenges, in person meter reading remains an essential safety function. During each visit, employees inspect company facilities, assess the surrounding area for excavation activity or other hazards, and carry methane detection equipment while at the meter location.

The Company has evaluated the potential implementation of automated meter reading technologies. While such systems could reduce the already low percentage of meters not read within six months (less than 1%) and within twelve months (less than 0.2%), the associated costs to ratepayers would be substantial. Additionally, automated systems would significantly reduce the frequency of onsite visits, thereby diminishing the safety benefits provided by regular physical inspections.

In recent years, National Fuel has expanded its customer engagement efforts to improve access for meter reading. The Company routinely contacts customers to schedule appointments at times that accommodate customer availability. National Fuel has also increased the number of off-hour appointment options and reduced appointment windows to enhance convenience and improve compliance with scheduled meter reading

requirements. The Company attempts to read meters during evenings and weekends to accommodate customer appointments. Additionally, the Company has moved nearly 20% of its inside meters outside since 2021.

Q. Are the slight increases in outages (0.046%) that OCA witness Wise references a concern to the Company?

A. The Company has experienced small year-over-year increases in service outages over the past three years. The rise has been very slight, and it is important to note that it is not always tied to operational deficiencies. Severe weather events can play a role and naturally drive fluctuations in outage numbers. One clear example occurred in December 2024, when Erie County experienced an extreme lake-effect snow event that dropped up to six feet of snow in a very short period of time, effectively paralyzing the region. Conditions like these make it significantly harder for crews to access infrastructure, respond to leaks, and restore service, which in turn contributes to temporary increases in outage counts.

Another key factor is the Company's and the Public Utility Commission's increased emphasis on repairing leaks more quickly, particularly in situations like third-party line hits. In recent years, crews have been encouraged to shut off valves rather than excavating and squeezing off the main. While this approach can improve safety and reduces risk during active leak events, it also results in more customer outages when these incidents occur. The Company continues to focus on and does have improved results in damage prevention which improve overall third-party line hits.

In summary, the Company's system and employees are resilient and handle challenging weather events well when customers need heat the most.

V. RESTORATION COSTS

Q. Do you agree with Mr. Burket's assessment on reducing restoration costs?

A. Generally speaking, I agree with Mr. Burkett's assessment on reducing restoration costs, and I note that the Company currently follows all of Mr. Burket's recommendations.

For example, National Fuel actively participates in countywide utility coordination meetings, works directly with PennDOT and municipal public works departments, and routinely coordinates construction schedules to minimize conflicts, disruptions, and associated costs. In addition, National Fuel frequently secures private rights-of-way where it is feasible to avoid unnecessary disturbance to public sidewalks and roadways. This practice reduces restoration expenses and enhances safety for both the public and National Fuel employees and contractors during construction and on an ongoing basis for Operating and Maintenance activities.

Beyond these coordination efforts, National Fuel categorizes and tracks replacement costs, such as materials, labor, restoration, and permitting where applicable on an overall and project specific basis. The Company does analyze cost drivers, looks for potential efficiencies, and negotiates cost savings where appropriate. Additional factors that are key to the evaluation are pipeline risk reductions, environmental impacts and permitting, and future pipeline and employee safety.

Where feasible and safe, National Fuel also evaluates and employs trenchless construction methods, including pipe insertion and directional boring, to further reduce surface disruption, limit restoration requirements, and improve overall project efficiency.

VI. SMART REMOTE METHANE DETECTION

Q. Do you agree with I&E witness Burket's recommendations to pilot Smart Remote Methane Detection, invest in Advanced Metering Infrastructure Meter or LoRa WAN for communicating with and report quarterly to the Commission for years 2027 through 2031?

A. Not at this time. The Company does not dispute that methane detection technologies may provide an additional layer of risk mitigation, and, in this regard as Mr. Burket noted, the Company is currently operating a methane detector pilot program in New York. Given that this pilot is still underway and is intended to evaluate feasibility, operational requirements, costs, and potential risks, it is not clear that conducting a duplicative pilot in a separate jurisdiction would yield materially different or additional information.

Additionally, there is active legislation in Pennsylvania that would require property owners to install methane detection consistent with the National Fire Protection Association (NFPA) 715. House Bill 1522 was passed on April 15, 2026, and is now under consideration in the Senate as Senate Bill 1128. The current compliance date is January 1, 2027. If property owners will soon be required to install methane detection devices, it may not be reasonable or cost-effective for utilities to simultaneously invest in separate methane-detection installations that would serve the same purpose at additional cost to ratepayers.

Moreover, any utility funded pilot would reach only a very small portion of National Fuel's customer base, limiting its overall effectiveness and value. Implementing a broader program would require substantial investment in infrastructure, IT systems, and field hardware investments,making an expanded pilot unrealistic at this time.

Additionally, it is important to note that the investment required to install SRMD technology, AMI)meters, or LoRaWAN communication systems for National Fuel's Pennsylvania customers would be substantial. The capital costs associated with deploying these technologies would be roughly equivalent to the cost of replacing more than 150 miles of main and associated services, as well as relocating several hundred meters to exterior locations. This level of expenditure would represent a significant redirection of resources away from core system replacement and safety enhancement activities.

Q. Does this conclude your rebuttal testimony at this time?

A. Yes.

NATIONAL FUEL STATEMENT NO. 17

MATTHEW W. STOOPS JR.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 17

Direct Testimony of Matthew W. Stoops Jr.

Topics Addressed: **Universal Service Programs**
Customer Initiatives

Dated: January 28, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Matthew W. Stoops Jr. My business address is 1100 State Street, Erie, PA 16501.

Q. By whom and in what capacity are you employed?

A. I am employed by National Fuel Gas Distribution Corporation ("NFGDC") as Consumer Business Senior Manager.

Q. Please provide your educational background.

A. I graduated from Gannon University in Erie, PA in 2010 with a Bachelor of Science Degree in Sports Management and Marketing.

Q. Please provide your professional experience.

A. I joined National Fuel in 2011 as a supervisor in the Consumer Business department which encompasses the call center, customer accounting, quality assurance, and administration of universal service programs. I have held various roles in the Consumer Business department. Over the last few years I have primarily focused on managing the training department, call monitoring, and employee engagement.

Q. Have you testified in other proceedings before the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission") or any other state or federal agency?

A. No. I have not testified in any other proceedings.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your testimony.

A. The purpose of my testimony is to provide an overview of the NFGDC Pennsylvania Division's ("National Fuel" or "Company") Universal Service Programs, specifically the Customer Assistance Program ("CAP") and Low-Income Usage Reduction Program ("LIURP"). In addition, I will provide an overview of the recent customer initiatives.

Q. Are you sponsoring any exhibits or filing requirements in this proceeding?

A. No.

III. UNIVERSAL SERVICE PROGRAMS

Q. Please provide an overview of the Company's CAP.

A. CAP is National Fuel's customer assistance program for income-eligible customers, which National Fuel offers per the terms of its Universal Service and Energy Conservation Plan approved by the Commission. This program was adopted by National Fuel in April of 2024 and replaced the previous Low Income Residential Assistance ("LIRA") Program. CAP offers affordable monthly payments and the opportunity to have outstanding balances due at the time of enrollment forgiven. A participant's bills while enrolled in CAP could be reduced to 4% or 6% of their monthly income, based on verified income and household size. This percentage is commonly referred to as the customer's "energy burden." The participant will either pay a percentage of income amount or their average bill, whichever is less. The minimum CAP payment amount is $12. In addition to discounted bills, CAP includes pre-program arrearage forgiveness and

energy education activities. The goal of the program is to increase customer affordability by targeting a 4% energy burden for customers in the 0% to 50% range of the federal poverty income guidelines ("FPIG") and a 6% energy burden for customers in the 51% to 150% FPIG range. In September 2025, there were approximately 5,700 customers enrolled in CAP. That number increased to just over 6,200 customers by the end of December 2025.

Q. Is National Fuel doing anything to increase participation in CAP?

A. Yes. In January 2025, National Fuel developed and implemented an online application for CAP, which allows customers to submit their applications electronically. In addition, on July 30, 2024, National Fuel communicated to the PAPUC its election to participate in the Department of Human Services ("DHS") Low Income Home Energy Assistance Program ("LIHEAP") data sharing protocol. The Company has worked with DHS to receive income and household information for households that grant consent to share the information. This information is intended to allow customers to enroll or recertify in CAP without having to submit a new application or proof of income-eligibility. The Company expects these changes will help improve program enrollment.

Q. Is the Company planning any additional changes to its CAP?

A. No. However, in January of 2025 the Company took over the administrative work for CAP that was previously completed by a third-party vendor. The Company expects that this change will help sustain and improve program enrollment.

Q. How is CAP funded?

A. CAP is funded via Rider F – CAP Discount Charge. Rider F is updated quarterly and effective each February 1, May 1, August 1, and November 1 of the year. The charge is also updated whenever there is a change to the Residential Sales Service Rate Customer Charge (basic service charge), Distribution Charge (cost to deliver gas), Natural Gas Supply Charge (cost of gas), or Gas Adjustment Charge (adjustment for over/under collected purchased gas costs).

Q. Is National Fuel proposing any changes to how CAP costs are recovered?

A. No.

Q. Please explain National Fuel's LIURP.

A. LIURP is a weatherization program designed to assist income-eligible customers to reduce their energy usage, thus reducing their bills. Through LIURP, eligible customers receive energy audits and education, heating system safety checks, wall and/or attic insulation, and other energy conservation measures. In addition to being income-eligible for LIURP, customers need to have annual gas consumption greater than or equal to 1,300 Ccf. In an effort to provide additional assistance to customers and expand the LIURP eligibility, the Company obtained a temporary PAPUC approval in January 2020 for a new pilot program, Low Consumption LIURP ("LC-LIURP"). Per Order of the Commission entered on December 21, 2023 at Docket No. M-2021-3024935, the LC-LIURP pilot program was extended through the duration of the 2022-2026 Universal Service and Energy Conservation Plan. The goal of this program is to identify and assist

households with moderate consumption (annual consumption greater than or equal to 900 Ccf but less than 1,300 Ccf) in which the residence has a similar amount of square footage equal to the identified yearly consumption. The Company bids LIURP work out to community agencies and private contractors to obtain the lowest price. National Fuel is focused on continuously improving its Universal Service Programs by participating in outreach activities and various initiatives to encourage and increase participation for eligible customers.

Q. Provide an overview of LIURP expenditures.

A. As of December 2025, the Company has invoiced contractors for amounts exceeding $2 million, representing a significant increase compared to just over $1 million in 2024. While National Fuel views this growth in contractor spending as a positive development, the organization remains cautious when projecting expenditures for 2026. This is due to the unique circumstances in 2025, when a government shutdown resulted in additional work being redirected from community agencies to the Company, potentially inflating the current year's figures.

Q. How is the LIURP funded?

A. LIURP is funded through base rates. Consequently, National Fuel has taken care to ensure that LIURP carefully balances assisting eligible customers with the effect the costs associated with LIURP have on the rates paid by non-participating customers. The budget for LIURP was increased by $91,000 to $1,391,000 effective August 1, 2023

following the rate case settlement approved by the Commission on June 15, 2023 in Docket No. R-2022-3035730.

Q. Is the Company proposing any changes to LIURP?

A. No.

Q. Please provide an overview of the Neighbor for Neighbor Heat Fund.

A. The Neighbor for Neighbor Heat Fund ("Neighbor for Neighbor") is a community program designed to provide grant assistance for home-heating emergencies to qualifying Pennsylvanians within National Fuel's service territory. The program can provide assistance to prevent the disconnection of gas service, pay current or past-due energy bills (excluding electric utilities), or purchase home heating fuel of any kind. The program is administered by the Greater Erie Community Action Committee ("GECAC"), located in Erie, Pennsylvania. GECAC maintains client data, manages all incoming and outgoing funds for the program, and issues monthly financial and casework reporting. Recommendations and guidance are provided by an advisory committee, comprised of representatives from human services and community action agencies across National Fuel's service territory, based on community needs.

Q. How is Neighbor for Neighbor funded?

A. The program is funded by public donations, with National Fuel Gas Company shareholders providing an annual sum of $92,000 to be used within National Fuel's territory. Customers may add $1, $2 or $5 donations to their gas bill payment, designated

to the Neighbor for Neighbor Heat Fund. Donations can also be made directly to GECAC in support of this program.

Q. Explain the Neighbor for Neighbor application and grant process.

A. The fund works with a network of community agencies to screen applicants for grants. Each agency will fill out applications with their clients and submit them to GECAC for final approval and processing. Applicants can also be referred directly from National Fuel to the community agency. National Fuel's customer service agents will complete a warm referral to the appropriate agency. If an application is approved, the grant will be sent directly to the heating source vendor. The intake agency will contact the heating vendor to place a hold on the applicant's account to prevent the accumulation of additional fees or charges while their payment is being processed and to ensure there is no interruption of service. Grants for assistance are limited to one per twelve-month period, per household. Maximum grant allowance for National Fuel customers is $500. Non-customer applicants may be eligible to receive up to $300 in grant funding. Grants can cover alternative energy sources (excluding electric) and can also go toward other natural gas supplier's bills, as long as the applicant resides within National Fuel's service territory.

Q. Provide an overview of the spending for the Neighbor for Neighbor program.

A. National Fuel maintains records regarding the number of grants issued and the aggregate monetary value of such grants under the Neighbor for Neighbor program. These figures are compiled and reported in accordance with the Company's fiscal year, which spans

from October 1 through September 30. As of September 2025, the Neighbor for Neighbor program had issued a total of 655 grants, amounting to $255,094. For comparative purposes, during the fiscal year ending September 2024, the program awarded 349 grants, with a total disbursement of $128,119. These figures demonstrate the Company's ongoing commitment to helping eligible households through the Neighbor for Neighbor program.

Q. Provide an overview of the outreach efforts National Fuel engages in.

A. National Fuel has implemented a comprehensive outreach initiative aimed at improving community awareness of its programs and payment options to support customers in need. This initiative includes participation in numerous community-based events across its 14-county service territory, educational outreach sessions with state and local organizations, and various other channels such as correspondence, digital marketing, social media, and community partner events.

Q. How does the Company evaluate the effectiveness of its outreach efforts?

A. To assess the effectiveness of these outreach efforts, National Fuel has collaborated with its Universal Service Advisory Committee ("USAC") to obtain feedback on Universal Service Programs. Additionally, the Company tracks each outreach activity, including the date and approximate attendance, on an annual spreadsheet. These evaluation methods are designed to provide valuable insights into the impact of National Fuel's outreach activities, helping the Company to refine its strategies and ensure that its efforts make a

meaningful difference in reducing energy costs and burdens for the most vulnerable populations.

IV. CUSTOMER INITIATIVES

Q. Please explain any new initiatives that the Company has implemented or planned to improve customer experience.

A. The Company is currently upgrading its online customer portal and sees these improvements as a critical component necessary to support our customers' experience in the future.

Q. How does the customer portal project benefit customers?

A. The upgraded customer portal should enhance self-service functionality. The dynamic of how customers interact with utilities is continuing to change, and customers are increasingly looking for more convenient self-service methods. Investing in an improved customer portal is a strategic move for long-term efficiency. As we transition routine inquiries to self-service channels, we enhance the customer experience by offering alternatives to the traditional call center hours of operation. This also reduces the strain on call center resources. Over time, this leads to more streamlined operations, improved scalability, and higher customer satisfaction. A robust self-service portal allows our customer service team to focus on more complex customer needs, enhancing service quality. By adding features and streamlining processes, customers will be empowered to find answers independently and submit commonly utilized service requests at their convenience.

Q. Are there limitations to the existing customer portal?

A. The current portal that is being upgraded is hosted by our third-party payment vendor which has limitations on expanding functionality and self-service options specific to the utility industry. The new portal will also enable real-time synchronization of data and eliminate the need to exchange flat files with the current vendor. The new portal will support shorter timeframes between functionality releases, ensure timely implementation of customer feedback and provide shortened timeframes for responding to regulatory requirements.

Q. Does this conclude your direct testimony at this time?

A. Yes.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 17-R

Rebuttal Testimony of Matthew W. Stoops Jr.

Topics Addressed:

Universal Service Programs and Low-Income Customers:
- **Identification of Low-Income Customers and Enrollment of Low-Income Customers in Assistance Programs**
- **Customer Assistance Program**
- **Low-Income Usage Reduction Program**
- **Neighbor for Neighbor Hardship Fund**

Other Issues:
- **Call Center Performance**
- **Payment Plans**
- **Payment Fees**
- **Outreach to One-Time Bill Credit Customers**

Dated: May 12, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Matthew W. Stoops Jr. My business address is 1100 State Street, Erie, PA 16501.

Q. Did you previously submit testimony in this proceeding on behalf of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company")?

A. Yes. I submitted my direct testimony, National Fuel Statement No. 17, on January 28, 2026.

II. PURPOSE OF TESTIMONY

Q. Please describe the purpose of your rebuttal testimony.

A. My rebuttal testimony responds to the direct testimony of other party witnesses. Specifically, I respond to portions of the direct testimony of Harry S. Geller, CAUSE-PA St. No. 1, submitted on behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), the direct testimony of LeeAnn Wise, OCA St. No. 5, submitted on the behalf of the Office of Consumer Advocate ("OCA"), and the direct testimony of Jennifer Warabak, PWPTF St. No. 1, submitted on behalf of the Pennsylvania Weatherization Providers Task Force ("PWPTF"). My testimony will focus on issues raised related to the Company's Universal Service Programs, low-income customers, call center performance, and payment fees.

Q. Are you sponsoring any exhibits with your rebuttal testimony?

A. Yes.

- National Fuel Exhibit MS-1R – Response to CAUSE-PA-6-04;
- National Fuel Exhibit MS-2R – Response to CAUSE-PA-5-01;
- National Fuel Exhibit MS-3R – Response to CAUSE-PA-I-06 (Revised);
- National Fuel Exhibit MS-4R – Response to CAUSE-PA-3-26;
- National Fuel Exhibit MS-5R – Response to CAUSE-PA-3-27;
- National Fuel Exhibit MS-6R – Response to CAUSE-PA-6-02;
- National Fuel Exhibit MS-7R – Response to CAUSE-PA-1-26 (Second Revised);
- National Fuel Exhibit MS-8R – Response to CAUSE-PA-2-07;
- National Fuel Exhibit MS-9R – Response to CAUSE-PA-2-14;
- National Fuel Exhibit MS-10R – Response to CAUSE-PA-2-10;
- National Fuel Exhibit MS-11R – Response to CAUSE-PA-2-08;
- National Fuel Exhibit MS-12R – Response to CAUSE-PA-2-21;
- National Fuel Exhibit MS-13R – Response to CAUSE-PA-1-02 and CAUSE-PA-4-19;
- National Fuel Exhibit MS-14R – 2024 PUC Customer Service Performance Report, Residential Payment Agreement Requests per Customer;
- National Fuel Exhibit MS-15R – Response to OCA-3-08;
- National Fuel Exhibit MS-16R – Response to CAUSE-PA-4-20; and
- National Fuel Exhibit MS-17R - Bill Insert Examples.

III. IMPACTS OF THE PROPOSED BASE RATE INCREASE ON LOW-INCOME CUSTOMERS

Q. Please summarize the concerns raised by CAUSE-PA witness Geller related to the general impact that he alleges the Company's proposed base rate increase will have on the Company's low-income customer population.

A. In his testimony, Mr. Geller claims that the Company's proposed rate increase will have a severe and detrimental impact on low-income families across its service territory. He also argues that it would be unjust and unreasonable to allow the Company any rate increase without the Company detailing the impact of its proposed rate increase on low-income customers. In addition, Mr. Geller claims that the Company's existing rates are already unaffordable, analyzing the demographics of National Fuel's service territory using a Self Sufficiency Standard instead of Federal Poverty Level ("FPL") data (CAUSE-PA St. 1 at 8-9), and citing energy burden statistics (CAUSE-PA St. 1 at 16-17).

Q. Do Mr. Geller's various concerns accurately depict the impact the Company's proposed base rate increase will have on low-income customers?

A. No. The Company believes that its Universal Service Programs are well designed and effectively assist the low-income population and will help alleviate the impact of a base rate increase. These programs include the Customer Assistance Program ("CAP"), the Low-Income Usage Reduction Program ("LIURP"), and the Neighbor for Neighbor Heat Fund. Additionally, there are external programs available, such as the Low-Income Home Energy Assistance Program ("LIHEAP"), which the Company actively promotes and which also provides bill assistance to low-income customers.

In addition, the Company disagrees with Mr. Geller's use of a Self Sufficiency standard instead of FPL data to measure the impacts of the rate increase. The FPL population and low-income household data is provided in the Pennsylvania Public Utility Commission's ("Commission") 2020-2024 American Community Survey 5-Year Estimates and is sourced from the United States Census Bureau. The Company uses this data to apply the same percentage of low-income households per county to the number of the Company's estimated low-income households per county. In many counties, the Company is not the service provider for the entire county. Furthermore, the demographics of the geographic area could impact this data. The FPL is used widely among other utilities and other programs throughout the state (e.g., Medicaid, Chip, SNAP, school lunch program, LIHEAP, and the Children's Health Insurance Program). The Commission also uses FPL guidelines for collection processes, security deposits, universal service eligibility, reporting and compliance. As such, the Company maintains that Mr. Geller's use of a Self Sufficiency Standard in analyzing impacts on low-income households is less reliable than FPL data, which is regularly used by assistance programs and government agencies to identify low-income customers.

IV. IDENTIFICATION OF LOW-INCOME CUSTOMERS AND ENROLLMENT OF LOW-INCOME CUSTOMERS IN ASSISTANCE PROGRAMS

Q. Do any of the other parties testify regarding the Company's performance in identifying low-income customers and enrolling low-income customers in its Universal Service Programs?

A. Yes. CAUSE-PA witness Mr. Geller addresses this issue in his direct testimony.

Q. Does the Company agree with these concerns?

A. No. I will address the various concerns raised by CAUSE-PA below.

Q. As an initial matter, please describe how National Fuel currently identifies its confirmed low-income customers.

A. The Company identifies low-income customers by collecting self-reported income information from customers through numerous points of contact, including when customers contact the Company to evaluate eligibility for assistance programs and/or payment arrangements, establish service when the customer has previous debt on another Company account, and during collections and reconnections. During these contacts, the Company also makes referrals to appropriate assistance programs if the customer's reported income information indicates they may be eligible. Additionally, the Company systematically identifies customers as low-income when it receives LIHEAP, CRISIS, or Supplemental payments from DHS for the customer. Lastly, all customers enrolled in the Company's CAP program are systematically identified as low-income.

Q. Does Mr. Geller recommend any changes to the Company's procedures for identifying low-income customers?

A. Yes. On pages 12-13 of CAUSE-PA Statement No. 1, Mr. Geller recommends that the Company (1) begin screening all new and moving customers for income level at the time service is established; (2) routinely screen customers for income information on all non-emergency calls and inquire about income updates if their income information is already noted in their account; and (3) when accounts are established and annually thereafter,

notify customers of the availability of low-income programs and request that customers voluntarily self-disclose any changes to income information; and (4) refer all customers identified as low-income through the screening process be referred for enrollment in the Company's Universal Service Programs. Mr. Geller states that customers should be able to opt out of this income screening after being informed that they may be eligible for a lower rate, debt forgiveness, or energy efficiency measures.

Q. Do you agree with these recommendations?

A. No. Screening all customers for their income level during all non-emergency calls would significantly increase call handle time, negatively impact customer service levels, require additional call center employee training, and ultimately require the hiring of additional call center employees to account for the increase in call handle time. Asking customers to provide income information on calls not related to collections may also be considered invasive and may offend callers, which could lead to a negative customer service experience. Further, although Mr. Geller's proposal includes an opt out provision, it does not limit the number of times the Company must screen a customer for income or updates to income in a given period, which means the Company could be required to screen all customers who do not opt out for their income or updated income, regardless of the date of their last contact.

In addition, CAUSE-PA's proposal would introduce additional administrative costs, because it would require the Company to implement system changes to track and identify which customers have received the required annual notification and produce the notification via some channel. A large portion of the customer population does not

engage with the Company until there is a need. Most customers, including lower income customers, are not payment troubled and historically have not responded to prior outreach. Indeed, only 3% of the Company's customers are identified as payment troubled.

As part of the Company's current procedures, customers are already asked for income information any time they contact the Company related to being unable to pay their bill, inquire about a termination notice or payment arrangement, request an extension for bill payment, and are referred to Universal Service Programs. As previously mentioned, the Company also identifies all customers receiving LIHEAP or CRISIS grants as low-income. The Company also already sends annual notifications to all customers through bill inserts (National Fuel Exhibit MS-17R), explaining payment options and the availability of bill assistance through Universal Services Programs. The Company is continuing to engage in outreach and increasing awareness of its Universal Service Programs; however, not all customers want to be referred to or participate in these programs, and increasing the number of confirmed low-income customers does not necessarily indicate improvement in program participation.

For those customers that have already provided income information in the past, income information is updated as needed through conversations with the customer, to assess their eligibility for a new payment arrangement, and to reverify income for continuing enrollment in CAP. This is accomplished through natural conversations that are responsive to customer needs and based on the individual customer's circumstances. By contrast, CAUSE-PA's proposal would require the Company to regularly ask all

customers to disclose income information and provide information about the availability of low-income programs, regardless of the reason the customer contacted the Company.

In summary, the Company's current processes are already sufficient to identify and screen customers experiencing financial hardship who proactively contact the Company, as income information is routinely obtained in relevant billing and assistance-related interactions and through ongoing outreach efforts. While the Company continues to enhance awareness and participation in Universal Service Programs, it recognizes that not all customers elect to engage in such programs. Nevertheless, the Company finds it reasonable to evaluate the feasibility of expanding income screening to all customer interactions, including service establishment, moves, and non-emergency calls. However, prior to implementation, any such evaluation must carefully assess the potential impacts on call handle time, required staffing levels to maintain call center performance standards, and an appropriate and measured timeline for implementation.

V. CUSTOMER ASSISTANCE PROGRAM (CAP) ENROLLMENT AND RECERTIFICATION

Q. Does any party raise concerns or propose modifications to the Company's existing CAP program?

A. Yes. CAUSE-PA witness Mr. Geller raises a number of issues regarding the Company's CAP program in his direct testimony, specifically concerning the program's enrollment and recertification methods.

Q. Is National Fuel already undertaking efforts to increase participation in CAP?

A. Yes. On July 30, 2024, National Fuel notified the Commission of its election to participate in the Department of Human Services ("DHS") LIHEAP data sharing protocol. Since that time, the Company has worked with DHS to receive income and household information for households that grant consent to share their information. This information is intended to allow customers to enroll or recertify in CAP without having to submit a new application or proof of income-eligibility. However, due to potential discrepancies with the data, the Company did not begin using the data from DHS until August 2025 (National Fuel Exhibit MS-1R). The Company is now using this data on an ongoing basis and expects these changes will help improve program enrollment. In addition, and as stated in my direct testimony, National Fuel Statement No. 17, in January 2025, National Fuel developed and implemented an online application for CAP, which allows customers to submit their applications electronically, and also took over the administrative work for CAP that was previously completed by a third-party vendor.

Q. Does Mr. Geller make recommendations regarding CAP enrollment?

A. Yes. Mr. Geller recommends specific benchmarking goals for CAP enrollment based on the percentage of estimated low-income customers in the Company's service territory. CAUSE-PA St. 1 at 5-9. Specifically, Mr. Geller recommends that the Company be required to increase its CAP enrollment by a minimum of 5% each year as a percentage of its estimated low-income customers, and for the Company to set forth a plan to

accomplish this goal through increased outreach, education, and implementation of his income screening proposal described above.

Q. Does the Company agree with this recommendation?

A. No. The Company disagrees with this recommendation. While the Company agrees that increased CAP enrollment would be a positive outcome, the Company cannot control or predict the levels of CAP enrollment and cannot compel customer participation on such a prescriptive timeline. There are many reasons that eligible customers may not choose to enroll in CAP. By enrolling in CAP, customers are under stricter collection processes. No payment arrangements or extensions are offered, and customers are subject to termination after one missed CAP payment. Customers must agree to be enrolled and understand what is expected as a participant of the program before enrollment. CAP customers are also required to provide income documentation to enroll and recertify to ensure that they are eligible to receive a discount and debt forgiveness, which helps control the burden on other customers.

In addition, Mr. Geller's benchmarking goals are not reasonable or achievable. In his testimony, Mr. Geller states that the Company's estimated low-income customer population is 57,542, which means his benchmarking goal would require the Company to increase its total CAP population by a *minimum* of 2,877 customers into CAP each year (i.e., 5% of 57,542). However, as of January 2026, 6,352 customers were enrolled in the Company's CAP. Mr. Geller's proposal would require the Company to increase its overall CAP enrollment from 6,352 to 9,229 in a single year, or by more than 45%. To meet this goal, the Company would also need to replace any customers that left CAP

during the year, either by defaulting, moving or stopping service, or voluntarily removing themselves from the program. This proposal is not feasible and improperly places the onus for CAP enrollment on the Company, which cannot control whether customers choose to sign up for or remain enrolled in the program. Moreover, the goal is improperly based on the population of estimated low-income customers, who by definition have not been confirmed as eligible for CAP. While the Company disagrees with the recommendation to benchmark CAP enrollment, any reasonable goal would use the Company's current and historic enrollment levels as a starting point, not an arbitrary percentage of the estimated low-income population. Importantly, Mr. Geller has not provided any evidence showing that increased outreach, education, or screening could achieve his benchmarking goal or address the inevitable budget increases and programmatic changes that would be necessary to achieve such a goal.

As such, and contrary to Mr. Geller's recommendation, the Company should be evaluated on its efforts and outreach to customers and not be required to meet unattainable obligations. The Company continues to educate customers about the benefits of CAP and other Universal Services Programs and is exploring options to improve outreach to customers who are at or below 150% of the FPL that include Universal Service Program education calls to customers with high balances, mailings that contain CAP program information and targeting of customers with no income recorded. Ultimately, however, if a customer chooses not to apply or recertify for CAP, it is outside of the Company's control.

Q. Please address CAUSE PA witness Mr. Geller's statements on page 27 of CAUSE-PA Statement No. 1, regarding the Company's enrollment statistics for CAP from 2025.

A. In 2025, the Company referred over 8,000 customers to its CAP program. Of those referrals, 2,385 returned the application and were enrolled during 2025 (National Fuel Exhibit MS-2R). The Company began processing data sharing files from DHS in August of 2025. Since that time, the Company has seen an increase month over month in CAP enrollments. Between July 2025 and January 2026, the Company increased its CAP enrollment by 698 customers (National Fuel Exhibit MS-3R). The Company expects that completed applications and enrollments will continue to increase as a result of the DHS data sharing program.

Q. Does Mr. Geller recommend that the Company take specific actions to improve its enrollment of low-income customers in CAP?

A. Yes. CAUSE-PA witness Mr. Geller makes several recommendations for improving CAP enrollment. CAUSE-PA St. 1 at 72.

Q. Please describe Mr. Geller's recommendations.

A. Mr. Geller recommends the following to improve CAP enrollment:

a) Improve the CAP recertification process to include an online recertification option, include a self-addressed stamped envelope with mailed CAP recertification forms, and expand recertification outreach to include email and text messages.

b) Require that National Fuel expand and improve its outreach to customers who have elected to share LIHEAP data with the Company but who are not enrolled in CAP to include mail, email, telephone call, and text message outreach and implement a more simplified enrollment process.

c) Require that National Fuel use the LIHEAP data it receives to recertify CAP eligibility for all CAP customers participating in LIHEAP data sharing regardless whether the customer is due to recertify eligibility.

d) Require that National Fuel establish benchmarking goals to increase CAP enrollment by a minimum of 5% of its estimated low income population each year.

e) Require that National Fuel track and report to its Universal Services Advisory Committee ("USAC") data regarding applications and recertifications.

f) Require that National Fuel track and report data regarding the total number of CAP accounts with arrears, the total dollar amount in debt for CAP customers, and the average amount of debt for CAP customers.

g) That the Commission commence an audit of National Fuel's collections and universal service program reporting to assess the need for additional corrective actions.

Q. Does the Company agree with Mr. Geller that additional outreach is needed for CAP recertification?

A. No, it does not. First, the Company has already implemented the majority of Mr. Geller's recommendations. The Company sends recertification information, which includes a

CAP application and a letter describing how to recertify online, to customers who are due for recertification, either by postal mail or email. If the information is mailed to the customer, the Company provides a self-addressed, stamped envelope to return the information. The Company emails the recertification information to customers that have consented to receive electronic communication from the Company. The Company's online customer portal, which is accessible through both desktop and mobile browsers, allows customers to complete a CAP application and upload any necessary documents for enrollment or recertification. Thus, the Company already sends recertification information to customers that are due for recertification based on their indicated preference, by postal mail or email, and already has an online recertification process. To the extent Mr. Geller is proposing that the Company reach out to recertifying customers using all recommended methods (email, mail, and text message), the Company agrees to begin sending customers recertification information by both mail and email when the customer consents to receiving electronic communications from the Company.

However, the Company does not currently have the ability to send text communications to these customers. This functionality would require system changes that would include identifying and selecting a platform to send text communications as well as identifying customers that consent to communications via text. This process requires time and resources that are outside the Company's proposal in this proceeding, and managerial decision-making of how such a change would be administered and implemented. As such, the Company does not agree with expanding outreach to text messages, as recommended by Mr. Geller.

Q. Please review and explain how the Company conducts outreach to customers who have elected to share LIHEAP (DHS) data with the Company, but who are not enrolled in CAP.

A. When the Company receives customer data from DHS, this data is used to automatically generate a CAP referral by mail if the customer is not enrolled in CAP. The customer is required to return a signed and dated simplified CAP agreement letter to complete enrollment (National Fuel Exhibit MS-4R). This can be returned by postal mail, email, fax, or completed online.

Q. Does the Company agree with Mr. Geller's recommendations to utilize additional means of outreach to customers who share LIHEAP (DHS) data with the Company?

A. No, the Company does not agree that it should be required to send additional outreach to these customers by mail, email, text, and phone.

Q. Why does the Company disagree with Mr. Geller's recommendation to utilize additional means of outreach to customers who share LIHEAP (DHS) data with the company?

A. As stated above, the Company automatically sends a customer who is not enrolled in CAP a referral by mail. This is an automated process created to reach as many customers as possible as soon as possible. As described above, the Company currently does not have the ability to send text communications to these customers. Mr. Geller's recommendation would require systemic changes to the Company's current outreach efforts and sending customers cumulative communications via postal mail, email and

phone call would add additional time to the referral process. However, the Company does see value in investigating outreach to these customers by phone and will explore this option as an additional method of outreach for customers that are not enrolled in CAP and opt to share LIHEAP (DHS) data with the Company.

Q. Mr. Geller recommends that the Company use the LIHEAP (DHS) data it receives to recertify a customer who is enrolled in CAP for all CAP customers regardless of whether the customer is due for recertification. Please explain the Company's current process for recertifying a CAP customer based on LIHEAP (DHS) data.

A. The Company reviews all customers who are currently due for recertification daily. This customer list is compared to the DHS data sharing file to see if these customers have agreed to share their data with the Company. If so, the Company sends a letter and program information advising the customer that they will continue to be on CAP (National Fuel Exhibit MS-5R).[1] This is a simplified process allowing the customer to continue to be on CAP without completing a full recertification.

Q. Does the Company agree with Mr. Geller's recommendations that the Company use the LIHEAP (DHS) data it receives to recertify a customer who is enrolled in CAP for all CAP customers regardless of whether the customer is due for recertification?

A. No. The Company strives to be as efficient as possible and to be conscious of completing work in a prioritized manner. The Company's recertification process is manual and

[1] The Company notes that although the original discovery response included as National Fuel Exhibit MS-5R indicates that the attachments, a sample simplified CAP application and recertification letter, are Confidential, these attachments have been redacted to remove all personally identifiable information and the versions attached to this testimony are not Confidential.

requires a manual review. Recertifying all customers enrolled in CAP who share their data through LIHEAP will be time consuming and not cost effective. The Company values simplifying this process for customers and has a process in place to do this when the customer's recertification is due. Adding time and resources to this process creates an inefficient review of the data shared by LIHEAP (DHS). In 2025, the Company began receiving large LIHEAP (DHS) data files in December. On average, these files included 683 CAP-enrolled customers. The December file was the largest, containing a total of 3,925 customers, of which 1,734 customers were enrolled in CAP (National Fuel Exhibit MS-6R).

Mr. Geller's recommendation would require the Company to recertify these customers outside of their normal recertification timeline, adding time and resources to the process. The Company's current method of recertification complies with its Universal Services and Conservation Plan and the Commission's regulations and orders, and the Company should not be required to implement an additional recertification process outside those guidelines.

Q. Does the Company agree with Mr. Geller's recommendation to require that the Company track and report to its USAC data regarding CAP applications and recertifications?

A. Yes. The Company currently holds regular meetings with USAC and reports current CAP participation numbers quarterly. Discussions are held regarding ways to increase enrollment, but the specific numbers are not currently shared beyond month end CAP enrollment numbers. The Company also discusses other topics surrounding its other

Universal Service Programs and outreach efforts. The requested information will take time to gather and report on during USAC meetings. However, the Company agrees to this recommendation and sees value in having discussions with USAC surrounding CAP applications and recertifications.

Q. Does the Company agree with Mr. Geller's recommendation to require that the Company track and report data regarding the total number of CAP accounts with arrears, the total dollar amount in debt for CAP customers, and the average amount of debt for CAP customers?

A. Since the Company is not currently required to report this information to the Public Utility Commission, it has not historically maintained this data. As a result, the information is only available on an ad hoc basis (National Fuel Exhibit MS-7R). The Company is currently evaluating both system enhancements and manual approaches to improve the structured reporting of this data. These changes require appropriate time to review and implementation. Accordingly, the Company anticipates implementing these enhancements by mid-2027.

Q. Please address CAUSE PA witness Geller's statements on page 37 and 38 of CAUSE-PA Statement No. 1 regarding the Company's CAP default percentage, CAP program costs on CAP credits, and arrearage management.

A. In regard to the Company's reported CAP default percentage listed in the Commission's 2024 Universal Service and Collections Report, the Company is required to report the CAP default rate, which is calculated by dividing the average monthly CAP participation

at each poverty level, by the total annual number of defaults for each poverty level. CAP customers are considered non-compliant (in default) when they fail to meet program requirements. This figure has been calculated the same way for each year from 2022 through 2024. The Company will be reviewing how to enhance this data collection going forward to see if any changes are needed.

The Company's reported 2024 spending for program costs for CAP credits (17%) and arrearage management (60%) are also accurate. Here, placing these figures in context of program changes explains the results pointed out by Mr. Geller. In April of 2024, the Company converted from its Low-Income Residential Assistance ("LIRA") program to CAP. At the time of conversion, the Company wrote off any balance a LIRA customer owed that was not originally part of their pre-program arrearage when they first enrolled in the program. This measure was to the benefit of the customer and contributed to the larger percentage of CAP spending for arrearage forgiveness in 2024. This transition from LIRA to CAP was approved by the Commission at Docket No. M-2021-3024935, in the Order entered on October 12, 2022. For comparison, the Company spent 14% in 2023 and 11% in 2022 on CAP arrearage forgiveness. In addition to the above benefit, customers were also given a "fresh start" in terms of program eligibility. This means that in-program LIRA arrears were not counted as CAP arrears, and all customers started CAP with a blank slate.

Q. Why does the Company disagree with Mr. Geller's recommendation to require an audit of the Company's collections and universal service program reporting to assess the need for additional corrective actions?

A. The Company disagrees with Mr. Geller's recommendation as the Company is already subject to comprehensive oversight and ongoing evaluation of its Universal Service Programs through established Commission-approved processes. In particular, the Company regularly files its Universal Service and Energy Conservation Plan ("USECP") with the Commission in accordance with applicable statutory and regulatory requirements.

The Company's most recent USECP was filed at Docket No. M-2021-3024935. That filing provides a detailed description of the Company's Universal Service Programs, including program structure and performance. Through this filing, the Commission and interested stakeholders are provided with transparency into the Company's efforts to administer and improve its Universal Service Programs.

In addition to internal review and Commission oversight, the USECP process includes an independent, third-party evaluation of the Company's Universal Service Programs. This evaluation is extensive and is designed to assess program effectiveness and compliance. The third-party evaluator provides feedback and recommendations, which the Company considers and uses to inform program enhancements and improvements.

Given this existing framework of regular USECP filings, Commission review, and independent third-party evaluation, the Company believes that an additional audit of its collections and Universal Service Program reporting would be duplicative and

unnecessary. The current processes already provide meaningful oversight and actionable feedback regarding the Company's Universal Service Programs.

In addition, Mr. Geller mischaracterizes the CAP data provided by the Company in discovery in support of his calls for an audit of the Company's collections and universal service program reporting. Many of CAUSE-PA's discovery requests asked for data aggregated and organized in a manner that the Company does not track or report in the normal course of business, and which the Company is not required to report to the Commission. However, the Company worked diligently to produce responsive data through multiple rounds of discovery, corrected any errors identified during this process through revised responses, and actively worked with CAUSE-PA to ensure it provided accurate and responsive data. CAUSE-PA's claims that Commission intervention is needed based on this process should be rejected.

VI. LOW-INCOME USAGE REDUCTION PROGRAM ("LIURP")

Q. Do any of the other parties raise concerns or propose modifications to the Company's LIURP?

A. Yes. CAUSE-PA witness Geller and PWPTF witness Warabak both recommend that LIURP funding be increased as a part of this proceeding. CAUSE St. 1 at 43; PWPFT St. 1 at 7. CAUSE-PA witness Mr. Geller also raises additional concerns regarding the Company's LIURP program. Specifically, Mr. Geller asserts that the Company's current LIURP program will take 206 years to serve the needs identified in its service territory. CAUSE-PA St. 1 at 41. He also recommends that the Company end its exclusion of mobile homes from participating in LIURP. CAUSE-PA St. 1 at 44. Finally, he

recommends the Company develop a written comprehensive plan to expend its full LIURP budget and expand the availability of LIURP to those in need. CAUSE-PA St. 1 at 43-44. Ms. Warabak also asks that the Company consider reducing its consumption threshold for its LIURP program. PWPTF Statement No. 1 at 6-7. I will address each of these issues below.

Q. Do you agree with Mr. Geller's and Ms. Warabak's recommendations to increase LIURP funding?

A. No. While the Company has seen an increase in spending of its LIURP budget, it does not agree that additional funding is necessary at this time. As stated in my direct testimony, National Fuel Gas Statement No. 17 at 5 and in National Fuel Exhibit MS-8R, this increase is attributed to many factors that include unique circumstances in 2025, when a government shutdown resulted in additional work being redirected from community agencies to the Company, increased outreach efforts to improve awareness of the program which included attending new events and locations across the service territory where more information was available to inform attendees about LIURP. The Company has also taken steps to find contractors who can handle additional and more consistent work. These efforts and circumstances combined have proven to be successful as the Company has seen an increase in LIURP spending and LIURP jobs completed (National Fuel Exhibit MS-9R). However, the Company has experienced a cancellation rate for customers not responding to outreach of planned weatherization projects of approximately 55%. The Company also notes that the budget for LIURP was recently increased by $91,000 to $1,391,000 effective August 1, 2023, following the rate case

settlement approved by the Commission on June 15, 2023, in Docket No. R-2022-3035730, and the Company already carries over dollars not spent from previous years. In 2025, the Company had carryover dollars of $1,450,879.24 (National Fuel Exhibit MS-10R). For these reasons, the Company does not agree to increase the LIURP funding.

Q. Please respond to CAUSE-PA witness Mr. Geller's statement on page 41 of CAUSE-PA Statement No. 1 that under the current LIURP program, it will take the Company 206 years to treat all income eligible households.

A. I disagree with the assumptions made in this statement. The source of data for this statement, the National Fuel Gas LIURP Evaluation Report by APPRISE, lists a percentage of households within the Company's service territory that are low-income customers (38,429) but does not account for homes that were already determined ineligible, refused services, had health and safety issues that prevent participation, or cannot otherwise be weatherized. This evaluation also does not account for the yearly consumption threshold of 1300 CCF for LIURP or 900 CCF for LC-LIURP (National Fuel Exhibit MS-11R), other weatherization programs available to serve customers in overlapping service territories, or federal programs available to customers such as the Pennsylvania Weatherization Assistance Program ("WAP"). These factors should be taken into account when evaluating how long it will take the Company to treat all income eligible households.

Q. Mr. Geller also recommends that the Company end its exclusion of mobile homes from participating in LIURP. CAUSE-PA St. How do you respond?

A. The Company does not include mobile homes in its LIURP weatherization services because such dwellings generally yield limited and insufficient energy consumption savings to support cost-effective weatherization. The Company's practice is in line with that of other gas utilities in Pennsylvania, including Columbia Gas of Pennsylvania, Inc. and Peoples Natural Gas Company. Mr. Geller's testimony does not consider the practical obstacles of weatherizing mobile homes, including issues with construction and the need for structural repairs. Adding insulation to these homes can also be less cost effective due to the limited space available to add the proper amount of insulation (ACEEE, Upgrading Manufactured Homes: Using Energy Efficiency to Improve Affordability and Health (Aug. 2023) at 7-8).

However, the Company does provide assistance to customers residing in mobile homes through its Emergency Repair and Replacement Program ("ERRP"). The ERRP program is designed to assist eligible customers with the emergency repair or replacement of natural gas heating and hot water heating equipment. Mobile homes are considered for eligibility under this program when emergency conditions exist.

In addition, the National Fuel Gas LIURP Evaluation Report prepared by APPRISE indicates that about 94 percent of households across all counties in the Company's service territory reside in single-family or multifamily homes (Table III-19, page 28). As a result, customers living in mobile homes represent a relatively small portion of households within the Company's service territory.

Given the limited participation of mobile homes and the comparatively low potential for cost-effective energy savings, expanding LIURP weatherization services to include mobile homes would not be a practical or cost-effective use of program resources. The Company therefore continues to address the needs of mobile home customers through its ERRP program.

Q. Why does the Company disagree with Mr. Geller's recommendation to require that the Company develop a written comprehensive plan to expend its full LIURP budget and expand the availability of usage reduction services to those in need.

A. As stated previously, the Company is already subject to an ongoing evaluation through its USECP. That filing provides a detailed description of the Company's Universal Service Programs, including its LIURP program. This filing lists a description of the program, eligibility requirements, needs assessment, budget information, and among other things, outreach efforts. Accordingly, the actions recommended by Mr. Geller are already addressed and completed through the Company's existing USECP process, and undertaking the comprehensive plan contemplated by Mr. Geller is not necessary.

Q. Please respond to PWPTF witness Warabak's statement on page 6 and 7 of PWPTF St. No. 1 that the Company consider reducing its consumption threshold for its LIURP program.

A. In regard to Ms. Warabak's statement, the Company evaluates lowering its consumption thresholds as part of the Company's LIURP program. In an effort to provide additional assistance to customers and expand the LIURP eligibility, the Company obtained

temporary Commission approval in January 2020 for a new pilot program, Low Consumption LIURP ("LC-LIURP"). Per the Order of the Commission entered on December 21, 2023 at Docket No. M-2021-3024935, the LC-LIURP pilot program was extended through the duration of the Company's 2022-2026 Universal Service and Energy Conservation Plan. The goal of this program is to identify and assist households with moderate consumption (annual consumption greater than or equal to 900 Ccf but less than 1,300 Ccf) in which the residence has a similar amount of square footage equal to the identified yearly consumption. With the Company's next USECP filing, the Company will either propose to make LC-LIURP a permanent part of its LIURP or discontinue LC-LIURP, providing justification for either.

VII. NEIGHBOR FOR NEIGHBOR ("NFN") HARDSHIP FUND

Q. Do any of the other parties raise concerns regarding the Company's NFN Hardship fund?

A. Yes.

Q. Please identify and summarize points made in that testimony.

A. CAUSE-PA witness Mr. Geller recommends that the Company's proposed changes to the NFN hardship fund be rejected and increasing the Company's annual contribution to the fund to $184,000. CAUSE-PA St. 1 at 48-50. Mr. Geller also asks the Commission to reject the Company's proposal outright, claiming that because it was raised in discovery, the proposed changes are not part of the record.

Q. Do you agree with these recommendations?

A. No, I do not agree. Initially, I will note that the NFN hardship fund issue was raised in response to a discovery request served by CAUSE-PA (*See* National Fuel Exhibit MS-13R) and appropriately reflects the Company's need to timely address program funding while ensuring that customers maintain access to this resource. The amount of NFN funds awarded to eligible customers in 2025 more than doubled compared to 2023 and 2024 (National Fuel Exhibit MS-12R). This increase can be attributed to many factors that include additional Company outreach about the fund, internal training to the call center staff, and the implementation of a warm referral process per order of the Commission entered on June 15, 2023 at Docket No. R-2022-3035730. These factors contributed to the NFN funding decreasing to a critical level. To avoid suspension of the program, the Company elected to release its annual shareholder contribution of $92,000 earlier than usual. The early release of the annual contribution was intended to address the immediate funding shortfall and maintain program availability.

The Company acknowledges the importance of ensuring that the NFN program is adequately funded to meet customer needs. However, the recommendation to increase the Company's shareholder contribution to $184,000 annually is not supported when the structure, purpose, and funding of the NFN program are considered in full. The recommendation that National Fuel "at minimum" double its contribution effectively establishes a funding expectation that exceeds the cited average contribution of other Pennsylvania utilities. Based on the Company's residential customer base of 196,629, the proposed contribution level would result in a per-customer funding level materially above the referenced benchmark ($0.94 per customer versus the $0.69 benchmark cited

by Mr. Geller in his testimony at page 50), rather than aligning with it. The Company does not believe that Mr. Geller's comparison supports the conclusion that its current funding level is insufficient or requires adjustment to the extent of his proposal.

As stated in the Company discovery response, National Fuel Exhibit MS-13R, the Company is evaluating the following changes to the NFN: (1) Making income a mandatory criterion; applicants need to meet both the income requirement (0-200% FPL) and one other specified/current requirement to qualify, (2) limiting the program to only National Fuel Gas customers, and (3) introducing flexibility in the hardship fund grant amounts awarded based on demand. The proposal to require that applicants meet both an income threshold (0–200% FPL) and one additional eligibility criterion is intended to ensure that the hardship fund remains a targeted, last-resort resource for customers facing hardship, consistent with the program's longstanding purpose. The proposed modification does not eliminate eligibility for low-income households; rather, it ensures that limited funds are directed to those experiencing both financial need and an additional qualifying hardship condition.

Additionally, limiting the program to National Fuel customers is intended to ensure that available hardship funds remain dedicated to individuals who have or have had a gas account with National Fuel and require last-resort assistance. This eligibility framework does not restrict access for any customer or applicant, as those terms are defined under 52 Pa. Code § 56.2. Here, the Company clarifies that it defines "non-customers" under this proposal as customers that do not receive their primary heating fuel from the Company and do not have an account with the Company. These "non-customers" use other fuel sources besides natural gas such as propane, fuel oil, or wood

pellets. These "non-customers" are not former National Fuel customers that have been terminated for more than 30 days, as suggested by Mr. Geller (CAUSE-PA St. No. 1, p. 49). The record should further demonstrate that non-customers have recently been utilizing more of the hardship funding. Specifically, such non-customer disbursements totaled $25,576.95 in 2025, representing a significant increase from $7,099.49 in 2023 and $7,016.34 in 2024 (National Fuel Exhibit MS-16R). Maintaining the program's focus on National Fuel customers is reasonable and necessary to preserve limited hardship funds for the population the program is designed to serve—those who rely on National Fuel's service. Moreover, non-customers are not left without assistance, as alternative resources, including the LIHEAP Crisis program, remain available to meet their needs.

Finally, introducing flexibility in the hardship fund grant amounts will allow the Company to continue operating the program and support customers consistently throughout the year. Specifically, the Company is evaluating modifying the hardship fund program guidelines to allow: (1) the maximum grant amount to be adjusted downward during periods of elevated demand or reduced fund balances; and/or (2) the program administrator to adjust grant amounts based on overall program demand and available funding, with the goal of assisting a greater number of eligible customers over the course of the program year. Under these modifications, the hardship fund would continue to provide meaningful assistance to eligible applicants, but individual awards could be adjusted to help prevent premature depletion of the fund and avoid temporary program suspensions.

At this time, the Company is not evaluating flexibility that would vary by factors such as customer income level, non-income eligibility criteria, or geographic location. Eligibility criteria and screening requirements would continue to apply uniformly across applicants.

Rather, the flexibility under consideration relates to program level conditions, such as overall demand for grants during a given period and the availability of program funds relative to projected need. Grant amounts would continue to be determined through the existing intake and review process based on an applicant's circumstances and documented need, but within adjusted program parameters intended to preserve the availability of assistance throughout the year. No formal written policy or procedure has been finalized or adopted that specifically governs flexibility to change hardship fund grant amounts based on demand.

These limited modifications are not intended to restrict access to assistance, but rather to preserve the viability of the hardship fund and ensure the continued availability of assistance to eligible customers throughout the program year.

Q. Please also respond to Mr. Geller's recommendation on page 8 of CAUSE-PA St. 1 that the Company increase voluntary contributions through fundraising.

A. The Company utilizes The Greater Erie Community Action Committee ("GECAC") as an independent third-party administrator to perform fundraising and certain administrative functions for its hardship fund. This structure is intentional and appropriate, as it preserves the independent and charitable nature of the fund. Assigning fundraising responsibilities to GECAC avoids any potential perception that the Company is self-

serving or directly soliciting contributions for its own benefit. At the same time, the Company maintains regular communication with GECAC regarding program operations, administration, and the overall status of the hardship fund. The Company also recognizes that contributions to the hardship fund are voluntary in nature, and neither the Company nor GECAC can control or compel the level of public participation or the amount of contributions received. This framework is already established and functioning as intended. Accordingly, there is no need to develop or implement additional processes or mechanisms related to fundraising or administration. Through this coordination, the Company ensures program effectiveness while reinforcing the critical importance of sustained funding to support vulnerable customers. Accordingly, it is neither reasonable nor appropriate to require the Company to conduct fundraising or solicit public donations for the hardship fund.

VIII. OTHER (NON-UNIVERSAL SERVICE RELATED) ISSUES

A. Call Center Performance

Q. Do any of the other parties compare National Fuel's call center performance to other Pennsylvania natural gas distribution companies ("NGDC")?

A. Yes. OCA witness LeeAnn Wise compares the Company's call center performance to that other NGDCs on pages 7 through 13 of her direct testimony (OCA St. 5) .

Q. Does the Company agree with OCA witness Wise's assessment?

A. No. The Company disagrees with OCA witness Wise's assessment of the Company's Customer Service Performance metrics. Ms. Wise underscores improvements the

Company has made but does not provide a review of the metrics where the Company excels, as presented by the Commission's Customer Service Performance and UCARE reports for 2024 and 2025.

For example, the Company has made improvements in its average calls answered within 30 seconds from 74% in 2022, 77% in 2023, and 91% in 2024. The positive increase from 2022 to 2025 was the largest increase seen by the Company's peers even as all NGDCs saw increased performance in this area during the same period. Moreover, in 2025 the Company's average calls answered within 30 seconds was the second highest of the NGDCs.

The Company's Annual Average Call Abandonment Rate between 2022 and 2024 was among the lowest of the Pennsylvania NGDCs that it was compared to from 2022 to 2024, averaging just 2% over this period and the lowest in 2024 at 1%.

In addition, Ms. Wise claims that the Company's busy out rate performance is "poor" by comparing it to the busy out rate of other Pennsylvania NGDCs. This is an unfair comparison, because most or all of the other NGDCs that the Company is being compared with have an Interactive Voice Response ("IVR") unit, which enables calls to be routed quickly to various options without receiving a busy signal, many of these options are self-help options. The Company does not have an IVR and, therefore, all incoming calls are answered by live customer service representatives ("CSRs"). The Company has received numerous compliments over the years from its customers stating that they like their calls answered by live CSRs as it leads to quicker resolution.

Finally, the Company acknowledges the small increase in customer complaints as they relate to payment arrangement disputes, however, these metrics do not take into

account the Company's low percentage of these complaints per customer and how they compare to the other NGDCs. Using the average number of residential customer counts from the 2024 Customer Service Performance Report, the Company has the second lowest number of Residential payment agreement requests per customer, indicating the Company's high level of performance. Please see National Fuel Exhibit MS-14R for the relevant excerpt from this report, showing the Company's performance.

Q. Please respond to Ms. Wise's statement on page 5 of OCA Statement No. 5 regarding the recommendation that the Company perform regular, thorough root cause analyses of complaint trends.

A. The Company already conducts an analysis of all customer complaints, referred to as "Justified Complaints." This analysis includes a review of all customer contacts on accounts associated with a complaint to ensure that Company policies and Commission regulations are followed. If it is determined that a Company policy or Commission regulation was not followed correctly, the Company reviews the contact and addresses the issue with all individuals involved. This may result in refresher training for the individual(s) on the specific topic(s) identified. If trends are identified, group refresher training may also be provided (National Fuel Exhibit MS-15R). Ms. Wise has not provided any evidence that this process is inadequate or out of compliance with the Commission's regulations or orders, or that her proposed root cause analysis would result in fewer customer complaints or greater customer satisfaction. As such, the Company maintains that its current system appropriately identifies and corrects systemic issues that may lead to customer complaints and a further root cause analysis is not necessary.

B. Payment Plans

Q. Please describe OCA witness Wise's recommendations related to the Company's payment plans.

A. OCA witness Wise recommends that the Company be required to conduct an analysis to track and determine whether a termination notice is avoided when a customer makes a payment or enters a payment plan, as a condition of any rate case ordered in this proceeding. OCA St. 5 at 13.

Q. Does the Company agree with OCA witness Wise's recommendation?

A. No. The Company disagrees with the recommendation that it be required to conduct an additional payment plan effectiveness analysis as a condition of any rate increase in this proceeding. The implication, that the Company lacks insight into how its payment arrangements and customer assistance options function to prevent service termination, does not accurately reflect National Fuel's existing processes or results.

First, the Company has developed and implemented comprehensive, formalized training for its call center employees that is specifically designed to ensure customers experiencing financial hardship are fully informed of all available options. This training outlines, in detail, the steps representatives must take when a customer indicates difficulty paying a bill or is facing potential termination. These options include payment arrangements, budget billing, extensions, referrals to assistance programs, and other tools intended to support continued service whenever possible. Call center representatives are trained to proactively discuss these options and work with customers to identify an appropriate solution based on individual circumstances.

Second, while the Company does not track termination avoidance in the narrow and prescriptive manner suggested in Ms. Wise's recommendation, the Company does monitor and evaluate broader customer payment behavior and outcomes, including trends related to customer indebtedness and enrollment in payment arrangements. As seen in the 2024 PUC Universal Service Programs and Collection Performance Report, the Company's percent of Total Dollars in Debt of customers on an arrangement rose from 38.6% in 2022, to 46.8% in 2024. These trends demonstrate that a growing percentage of customers carrying arrears are actively enrolled in payment arrangements, reflecting increased customer engagement with the tools the Company offers and the effectiveness of its frontline practices in connecting customers to those options (2024 PUC Universal Service Programs and Collection Performance Report, p. 24).

Importantly, the absence of a single data point—such as whether a specific termination notice was avoided following a payment or arrangement—does not indicate that current programs are ineffective or inadequately managed. Nor does it mean that additional reporting would enhance customer protections beyond those already achieved through existing policies, training, and oversight. The Company's approach prioritizes direct customer interaction, flexibility, and early intervention, all of which are essential elements of effective arrearage management but are not captured solely through a termination metric.

Finally, the recommended mandatory study and reporting requirement would impose additional administrative burden without a commensurate benefit to customers or regulators. The Company already evaluates its customer assistance framework holistically and continues to refine its practices consistent with regulatory requirements

and customer needs. Ms. Wise has not provided any data suggesting that undertaking the analysis would benefit either customers or the Company, and Ms. Wise has not provided any evidence that the Company's current practices to not comply with the Public Utility Code or the Commission's regulations or orders. As such, requiring an additional, narrowly defined analysis as a condition of rate relief is not warranted under these circumstances.

For these reasons, the Company submits that its existing training, customer engagement practices, and demonstrated increase in customer participation in payment arrangements appropriately support customers experiencing payment difficulties, and the recommendation should be rejected.

C. Payment Fees

Q. Do any of the parties address the Company's current options for fee free payments?

A. Yes. OCA witness LeeAnn Wise recommends that the Company transition to a fee-free payment system, which would allow customers to make electronic payments at no cost. OCA St. 5 at 16-17.

Q. Please respond to Ms. Wise's concerns and discuss the Company's current options for fee free payments.

A. Currently, customers have multiple options to make payments to the Company without incurring any fees. Customers may pay in person at one of the Company's two drop boxes located at 1100 State Street, Erie PA or 1 Relief Street, Oil City PA with no fee. Customers may also pay by mail to PO Box 371835, Pittsburgh, PA 15250-7835 without

a fee. Additionally, customers can sign up for AutoPay with ACH, which will automatically deduct their bill amount from their checking/savings account and not incur a fee. Lastly, customers can select One-Time-Pay with ACH using our third-party vendor's online payment portal without incurring a fee. It should also be noted that fees incurred using a third-party option (Online, By Phone, or Authorized Payment Center) are charged by the third-party at the time of payment and are not billed to the customer by the Company.

Q. Does the Company agree with OCA witness Wise's recommendation to transition to fee-free electronic payments and that those costs be absorbed by the Company and included in rate base?

A. Not at this time. As noted above, customers already have multiple options for fee-free payments, including electronic options. While the Company may evaluate the feasibility of moving toward fee-free payments in the future, it is not willing to commit to this transition as part of this case. Importantly, the Company did not propose moving to fee-free payment methods in this case and so did not include the costs of payment processing fees in its revenue requirement. While OCA has proposed an adjustment to operating expenses of $930,000 to reflect its recommendation, OCA provides no explanation as to how it arrived at this figure or data supporting that it reflects an accurate forecast of the cost to transition to and implement a fee-free payment structure. Indeed, the proposed adjustment is less than the total amount of processing fees paid by customers in 2025 (see OCA Exhibit LMW-3), even while Ms. Wise acknowledges that "[i]t is also likely that eliminating payment fees will encourage more customers to adopt online payment

methods" (OCA St. No. 5, p. 17). Absorbing payment process fees is a managerial decision that should be made by the Company and requires consideration of many factors, including negotiating a reasonable rate with the Company's third party vendor, performing any system changes required to implement the change, and anticipating any growth in adoption of online payments by customers if fees are eliminated.

D. One-Time Bill Credit

Q. Do any of the other parties have recommendations about the communication methods concerning the one-time bill credit (National Fuel Gas Statement No. 17 at 14)?

A. Yes. CAUSE-PA witness Mr. Geller suggests that the Company distribute the one-time bill credit during a winter heating month, between December and March, and that the Company conduct affirmative outreach by mail, email, telephone call, and text message to screen all customers that receive the credit for potential eligibility for CAP and/or other universal service programs. CAUSE-PA St. 1 at 69.

Q. How does the Company respond?

A. The Company agrees that customers receiving the one-time bill credit should be informed of the credit and agrees to distribute the bill credit in December 2026. To that end, the Company plans to notify customers receiving the credit through existing communication channels already in place. Customers will receive notice of the one-time bill credit directly on their utility bill, delivered using the customer's preferred billing method, including paper or electronic delivery. This approach utilizes established and effective

communication processes with which customers are familiar. The Company respectfully submits that layering a requirement for mandatory outreach to all affected customers through multiple channels, including separate mailings, electronic messages, and outbound phone calls, would introduce unnecessary significant administrative burdens and costs to a streamlined process meant to directly benefit customers. As described in detail above, customers who express interest in CAP or other assistance programs through existing customer interactions are already directed to the appropriate resources consistent with current practices, and the Company regularly refers customers to universal service programs. Accordingly, the Company believes its planned approach appropriately balances customer awareness, program access, and efficiency.

Q. Does this conclude your rebuttal testimony at this time?

A. Yes.

NATIONAL FUEL EXHIBIT MS-1R

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Of the households indicated in response to CAUSE-PA 6-3, please indicate: a) The number of households recertified for CAP using LIHEAP data from DHS; b) The number of households removed from CAP for failure to recertify eligibility.

Response

Although the Company was receiving files from DHS beginning in August 2024, the Company at the request of DHS, did not begin using the data for CAP recertification or removal until August 2025 due to potential discrepancies with the data. Please see Attachment Cause-PA-6-04 for available data.

Year	Month	CAUSE-PA 6-4 (a) The number of households recertified for CAP using LIHEAP data from DHS	CAUSE-PA 6-4 (b) The number of households removed from CAP for failure to recertify eligibility
2024	August	N/A	N/A
2024	September	N/A	N/A
2024	October	N/A	N/A
2024	November	N/A	N/A
2024	December	N/A	N/A
2025	January	N/A	N/A
2025	February	N/A	N/A
2025	March	N/A	N/A
2025	April	N/A	N/A
2025	May	N/A	N/A
2025	June	N/A	N/A
2025	July	N/A	N/A
2025	August	0	0
2025	September	3	0
2025	October	6	0
2025	November	1	0
2025	December	9	6
2026	January	26	2
2026	February	7	0

NATIONAL FUEL EXHIBIT MS-2R

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From January 2023 to date, disaggregated by month and year, as of the last day of the month/year, please indicate: a) How many customers applied for NFG's CAP? b) How many of the customers who applied for NFG's CAP were approved? c) How many of the customers who applied for NFG's CAP were rejected, disaggregated by the reason for rejection? Please provide this data in a live Excel spreadsheet.

Response

See Attachment Cause-PA-5-01 (1) for parts (a) and (b). Note that the Company transitioned from its Low Income Residential Assistance (LIRA) program to its Customer Assistance Program (CAP) in April 2024. This data is not available for that month.

See Attachment Cause-PA-5-01 (2) for part (c).

Please note that applications received in a particular month are not always rejected or accepted within that same month.

Year	Participation	January	February	March	April	May	June	July	August	September	October	November	December
2023	Applicants	635	812	896	626	751	659	489	458	408	417	288	154
	Applicants Accepted	183	99	482	342	256	206	278	419	361	154	94	134
2024	Applicants	311	655	560	528	1011	688	582	491	439	361	355	243
	Applicants Accepted	177	158	190	N/A	173	80	191	278	341	301	284	99
2025	Applicants	338	503	650	693	610	609	562	770	1151	511	607	1063
	Applicants Accepted	162	43	112	134	160	214	283	144	247	363	191	332
2026	Applicants	1778	505										
	Applicants Accepted	222	205										

Year	Reject Reason	January	February	March	April	May	June	July	August	September	October	November	December
2023	Customer Request	1	0	3	0	1	1	1	0	0	0	0	0
2023	Deceased	1	1	0	0	1	2	1	1	0	0	0	0
2023	Enrolled W/ Marketer	1	2	2	1	1	2	0	1	1	0	0	1
2023	Entered into an IP	0	0	2	0	0	0	0	0	0	0	0	1
2023	Moved	12	8	33	14	21	10	13	13	10	11	5	7
2023	No Longer Meets Req	0	1	4	1	1	11	1	4	0	3	0	2
2023	Non-Response	76	458	633	427	289	682	371	327	179	197	209	262
2023	Over Income	7	12	13	15	17	4	4	11	6	5	1	5
2023	Shut-Off Non-Pmt	0	0	0	0	1	2	2	1	0	1	0	1
2023	Withdrawn	1	0	2	0	0	0	0	0	12	22	10	9
2023	Reinstated	0	0	0	0	0	0	0	0	0	0	0	0
2023	Other	10	18	65	17	104	48	17	20	7	4	5	2
2024	Customer Request	0	1	0	0	1	1	1	1	0	0	0	1
2024	Deceased	0	0	0	0	0	2	0	1	0	0	0	0
2024	Enrolled W/ Marketer	1	0	0	1	1	3	0	3	4	5	5	2
2024	Entered into an IP	0	0	0	0	0	0	5	0	0	0	0	0
2024	Moved	2	3	8	11	5	9	5	16	8	3	3	4
2024	No Longer Meets Req	1	1	0	0	1	0	0	1	0	2	0	0
2024	Non-Response	127	149	352	363	102	403	515	289	231	150	286	260
2024	Over Income	2	1	1	7	6	11	8	1	4	1	5	6
2024	Shut-Off Non-Pmt	0	0	0	1	0	0	0	1	1	0	0	0
2024	Withdrawn	6	5	28	1	0	0	0	1	1	0	1	1
2024	Reinstated	0	0	0	0	0	0	0	0	0	0	0	0
2024	Other	8	8	12	44	1	6	4	4	3	0	1	5
2025	Customer Request	1	0	1	1	0	0	0	0	0	0	1	1
2025	Deceased	2	2	1	2	2	2	0	1	1	0	1	2
2025	Enrolled W/ Marketer	0	0	1	2	0	2	1	0	0	2	1	0
2025	Entered into an IP	0	0	0	0	0	0	0	0	0	0	0	0
2025	Moved	2	4	8	4	5	2	3	3	8	22	13	3
2025	No Longer Meets Req	0	1	4	3	1	1	1	0	1	0	1	1
2025	Non-Response	115	105	282	168	380	326	310	196	126	727	160	360
2025	Over Income	4	1	2	7	11	9	16	6	7	7	8	4
2025	Shut-Off Non-Pmt	0	0	0	0	0	0	0	0	0	0	0	1
2025	Withdrawn	0	1	3	4	2	3	2	3	2	2	4	2
2025	Reinstated	0	0	0	0	0	0	1	0	0	0	0	0
2025	Other	1	1	5	1	6	1	7	4	1	0	4	4
2026	Customer Request	0	0										
2026	Deceased	0	1										
2026	Enrolled W/ Marketer	2	0										
2026	Entered into an IP	0	0										
2026	Moved	3	13										
2026	No Longer Meets Req	1	2										
2026	Non-Response	417	708										
2026	Over Income	6	11										
2026	Shut-Off Non-Pmt	0	0										
2026	Withdrawn	11	6										
2026	Reinstated	0	0										
2026	Other	1	2										

NATIONAL FUEL EXHIBIT MS-3R

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From January 2023 to date, disaggregated by month and year, as of the last day of the month/year, how many of NFG's customers were/are enrolled in NFG's CAP? Please provide this information broken down by CAP enrollment type (i.e., percentage of income, average bill, minimum bill, etc.). Please provide this data in a live excel spreadsheet.

Response

The Company does not track CAP customers by enrollment type as described. This information is not captured at enrollment, but rather at monthly invoicing.

The Company would define this information as "CAP bill type" (i.e., percentage of income (PIP), average bill or minimum bill). See revised response Cause-PA-I-03 for this information.

See Attachment Cause-PA-I-06 for available data which includes total customers enrolled in CAP by month and year.

Year	Month	Enrolled in CAP
2023	January	6736
2023	February	6706
2023	March	7070
2023	April	7291
2023	May	7361
2023	June	7356
2023	July	7441
2023	August	7675
2023	September	7820
2023	October	7510
2023	November	6927
2023	December	7077
2024	January	6604
2024	February	5906
2024	March	5888
2024	April	6133
2024	May	6244
2024	June	5807
2024	July	5633
2024	August	5699
2024	September	5832
2024	October	5897
2024	November	6017
2024	December	5930
2025	January	5989
2025	February	5992
2025	March	5973
2025	April	5892
2025	May	5803
2025	June	5705
2025	July	5654
2025	August	5658
2025	September	5743
2025	October	5929
2025	November	6002
2025	December	6217
2026	January	6352

NATIONAL FUEL EXHIBIT MS-4R

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Does NFG provide a simplified CAP application for customers who are recipients of Low Income Home Energy Assistance Program (LIHEAP) grants? Please specifically explain this process and provide a copy of the current NFG CAP application, and any simplified CAP application provided to customers who are LIHEAP grant recipients.

Response

Provided a customer consents to data sharing when completing a LIHEAP application and has elected to have their LIHEAP basic cash grant sent to the Company. A file is sent to the Company from the Department of Human Services (DHS) of customers who consented to data sharing and who have their LIHEAP grant sent to the Company. When this file is received, a simplified application will automatically be sent to the customer.

When the customer receives this simplified application, they are only required to choose a “Yes” or “No” response if they are willing to participate in the Company’s CAP program, sign, and date the application. The customer will then be enrolled in CAP when the signed agreement is received.

See Attachment Cause-PA-3-26 (1) for the Company’s regular CAP application.

See Attachment Cause-PA-3-26 (2) for the Company’s simplified CAP application.

National Fuel®

CAP Application

P.O. Box 2081 • Erie, PA 16512-9906

This application **must be returned to National Fuel** by _____

IF YOU NEED HELP COMPLETING THIS APPLICATION, PLEASE CALL **1-800-365-3234.**

Avoid delays, apply online at www.nationalfuel.com/applycap

Name:	**Account Number:**
Address:	**SSN or Alternate ID#**:**
City, State, ZIP:	**Date of Birth (MM/DD/YY):**
Phone Number:	**Email Address:**

COMPLETE THIS SECTION FOR YOURSELF	
Income Source:	Amount:
2nd Income Source:	Amount:

(SEE REVERSE SIDE FOR EXAMPLES OF ACCEPTABLE PROOF OF INCOME)

PERSONS LIVING IN YOUR HOME: *(For additional household members, please provide information on last page)*

NOTE: LIST ALL HOUSEHOLD MEMBERS. PROVIDE INCOME SOURCE FOR ADULT HOUSEHOLD MEMBERS ONLY. YOU DO NOT NEED TO LIST INCOME FOR MINORS*

Full Name:	
SSN or Alternate ID#**:	Date of Birth (MM/DD/YY):
Relationship to you:	Minor (Y/N)*:
Income Source:	Amount:
2nd Income Source:	Amount:
Full Name:	
SSN or Alternate ID#**:	Date of Birth (MM/DD/YY):
Relationship to you:	Minor (Y/N)*:
Income Source:	Amount:
2nd Income Source:	Amount:
Full Name:	
SSN or Alternate ID#**:	Date of Birth (MM/DD/YY):
Relationship to you:	Minor (Y/N)*:
Income Source:	Amount:
2nd Income Source:	Amount:
Full Name:	
SSN or Alternate ID#**:	Date of Birth (MM/DD/YY):
Relationship to you:	Minor (Y/N)*:
Income Source:	Amount:
2nd Income Source:	Amount:
Full Name:	
SSN or Alternate ID#**:	Date of Birth (MM/DD/YY):
Relationship to you:	Minor (Y/N)*:
Income Source:	Amount:
2nd Income Source:	Amount:

(SEE REVERSE SIDE FOR EXAMPLES OF ACCEPTABLE PROOF OF INCOME)

*__Minors__ are defined as children under the age of 18. **DO NOT complete income information for minors.**

**__Alternate ID__: If providing alternate ID, please mail copy of ID with the application. Alternate ID could include (but not limited to) one of the following: valid driver's license, green card, state issued ID, or passport.

Verification of Income: Please attach **COPIES** of proof listed below to verify ONE MONTH of total household income or annual income if your income for the last 30 days is higher than usual.

SOURCE:	**ACCEPTABLE PROOF (COPIES):**
Wages	Recent pay stubs, statement from employer
Unemployment	Eligibility letter, benefit check
Public Assistance	Notice of Eligibility
Pension	Pension check, benefit letter
Social Security/SSI/SSD	Benefit statement, bank statement
Self-employment	Most recent federal tax return

Does your Household receive Food Stamps? (Y/N):	Monthly amount:
Do you own or rent your home (circle one): OWN RENT	Square Footage of home:
Select home type (circle one): Single Home Apartment Row/Semi/Townhome Mobile Home Other (please specify):	

REMINDER - It is very important to pay your bills on time and in full!

Important Information Regarding CAP:

National Fuel's Customer Assistance Program (CAP) is offered per National Fuel's Universal Service and Energy Conservation Plan (Plan) as approved by the Pennsylvania Public Utility Commission and National Fuel's Pennsylvania Tariff. The attached **CAP Features Sheet** summarizes key provisions of National Fuel's CAP.

In addition, if enrolled in CAP, I acknowledge and agree:

- My CAP payment will be no more than 4% or 6% of my verified monthly household income, subject to a minimum CAP payment of $12.00.
- My CAP payment will be my percentage of income amount or my average bill amount, whichever is less.
- All bills must be paid to receive the full benefit of the CAP program. If I do not pay my CAP bill, my gas service may be terminated. No extensions or payment arrangements will be offered.
- If my gas service is terminated, I must pay the notice amount plus a turn on charge for reconnection.
- I must promptly notify National Fuel if my household size or income changes.
- If I fail to respond when asked to update my household and income information, I will be removed from CAP.
- If I refuse energy conservation/weatherization services, I will be removed from CAP. If I rent, I will not be penalized if the landlord does not agree.
- National Fuel is my current gas supplier and must remain my gas supplier while I participate in CAP. If I choose to buy gas from another supplier, I will be removed from CAP.
- The service address must be my personal residence and gas service used at this address is for me and members of my household solely for residential purposes for heating, hot water, cooking and drying clothes.
- I have notified all adult household members of the terms and conditions of CAP and that they are listed on the application. They have been notified they are responsible for all gas bills as an occupant of the residence.

CAP Applicant's Acknowledgment and Signature:

I am interested in participating in Customer Assistance Programs with my other utilities and sharing my CAP eligibility information with them.

☐ **Yes** ☐ **No**

I have read and understand the contents of my CAP application and agree to the terms and conditions of CAP and certify that all statements/certifications made in this application are true, accurate, and correct. In addition, my signature also confirms that I have read, reviewed, and acknowledged the CAP Features Sheet. My signature on this form grants permission for disclosure and release of information to NATIONAL FUEL concerning employment, income, public benefits received, and agencies and banking institutions to verify this information. In addition, if I selected "yes" to the question concerning interest in programs with other utilities, I consent to the information provided in this CAP application to be shared with other utilities for purposes of determining eligibility for their Customer Assistance Programs.

SIGNATURE:_____Date: _____

ADDITIONAL HOUSEHOLD MEMBERS:

Full Name:	
SSN or Alternate ID#**:	Date of Birth (MM/DD/YY):
Relationship to you:	Minor (Y/N)*:
Income Source:	Amount:
2nd Income Source:	Amount:
Full Name:	
SSN or Alternate ID#**:	Date of Birth (MM/DD/YY):
Relationship to you:	Minor (Y/N)*:
Income Source:	Amount:
2nd Income Source:	Amount:
Full Name:	
SSN or Alternate ID#**:	Date of Birth (MM/DD/YY):
Relationship to you:	Minor (Y/N)*:
Income Source:	Amount:
2nd Income Source:	Amount:
Full Name:	
SSN or Alternate ID#**:	Date of Birth (MM/DD/YY):
Relationship to you:	Minort (Y/N)*:
Income Source:	Amount:
2nd Income Source:	Amount:
Full Name:	
SSN or Alternate ID#**:	Date of Birth (MM/DD/YY):
Relationship to you:	Minor (Y/N)*:
Income Source:	Amount:
2nd Income Source:	Amount:
Full Name:	
SSN or Alternate ID#**:	Date of Birth (MM/DD/YY):
Relationship to you:	Minor (Y/N)*:
Income Source:	Amount:
2nd Income Source:	Amount:
Full Name:	
SSN or Alternate ID#**:	Date of Birth (MM/DD/YY):
Relationship to you:	Minor (Y/N)*:
Income Source:	Amount:
2nd Income Source:	Amount:
Full Name:	
SSN or Alternate ID#**:	Date of Birth (MM/DD/YY):
Relationship to you:	Minor (Y/N)*:
Income Source:	Amount:
2nd Income Source:	Amount:
Full Name:	
SSN or Alternate ID#**:	Date of Birth (MM/DD/YY):
Relationship to you:	Minor (Y/N)*:
Income Source:	Amount:
2nd Income Source:	Amount:

PO BOX 371835
PITTSBURGH PA 15250-7835
National Fuel®

[redacted]

Account Number: [redacted]

[redacted]

January 06, 2026

Dear [redacted],

RE: Service Address: [redacted] Account Number: [redacted]

You may be eligible for National Fuel's Customer Assistance Program (CAP). This program offers affordable monthly payments and debt forgiveness on any outstanding balance at the time you are enrolled.

When you recently applied for LIHEAP, you gave permission to the Department of Human Services (DHS) to share your household and income information with your utilities for the purpose of enrolling in their Customer Assistance Programs and other utility assistance programs.

We have reviewed your gas account and found that you are eligible for CAP. This program is a percentage of income program. Your CAP payment will be no more than 4% or 6% of your household's verified monthly income, subject to a minimum CAP payment of $12. Your CAP payment amount will be your percentage of income amount or your average bill amount, whichever is lower.

At the time of your CAP enrollment, your existing account balance, if any, will be placed on hold. If you pay your bill each month, 1/24th of your pre-CAP balance will be eliminated and forgiven. While you are on the program, you will continue to receive debt forgiveness until the entire pre-CAP balance is forgiven.

If you would like to be enrolled in CAP, National Fuel must have written authorization. It is important that you sign and return the attached agreement by **January 16, 2026** so you can be enrolled in this valuable program. Please return your information in the enclosed envelope, fax to 814-871-8250 or email to CAP@natfuel.com.

Please review the enclosed CAP FEATURES and ENERGY EFFICIENCY TIPS. They provide important information about CAP and cost-saving energy tips to help reduce your usage.

If have any questions, please call 1-800-365-3234.

Sincerely,

National Fuel
Enclosures

CAP Agreement Notification

RE: Service Address [redacted] Account Number: [redacted]

I confirm and understand that:

- The Customer Assistance Program (CAP) is a percentage of income program.
- My monthly CAP amount will be no more than 4% or 6% of my verified monthly household income, subject to a minimum payment of $12.
- My CAP payment will be my percentage of income amount or my average bill amount, whichever is less.
- All bills must be paid to receive the full benefit of CAP. If I do not pay my CAP bill, my gas service may be terminated.
- If my gas service is terminated, I must pay the notice amount, my current bills if overdue, and a reconnection charge per the Company's Tariff.
- I must promptly notify National Fuel if my household size or income changes.
- If I fail to respond when asked to update my household and income information, I will be removed from CAP.
- If I refuse energy conservation/weatherization services, I may be removed from CAP. If I rent, I will not be penalized if the landlord does not agree.
- National Fuel is my current gas supplier and must remain my gas supplier while I participate in CAP. If I choose to buy gas from another supplier, I will be removed from CAP.
- The service address must be my personal residence and gas service used at this address is for me and members of my household solely for residential purposes for heating, hot water, cooking, and drying clothes.
- I have notified all adult household members of the terms and conditions of CAP and that they are listed on the application. They have been notified they are responsible for all gas bills from the date of their enrollment until cancellation of their CAP participation.

I am interested in participating in Customer Assistance Programs with my other utilities and sharing my CAP eligibility information with them.

_____Yes ____No

By my signature, I agree to each of the following:

1. I have read and understand the contents of my CAP agreement and/or CAP application and agree to the terms and conditions of CAP.
2. I have read, reviewed, and acknowledged the enclosed CAP Features Sheet.
3. I grant permission for the disclosure and release of information from any source, individual, or organization to National Fuel concerning employment, income, public benefits received, and agencies and banking institutions to verify this information.
4. If I selected "yes" to the question concerning interest in programs with other utilities, I consent to the information provided in this CAP application to be shared with other utilities for purposes of determining eligibility for their Customer Assistance Programs.
5. To the extent National Fuel has received my income and household information from the information provided to the Pennsylvania Department of Human Services as part of my LIHEAP Application, I acknowledge that I have authorized DHS to share this information with all public utilities (including National Fuel) for purposes of, among other things, enrollment into Universal Service Programs like CAP.
6. I agree that for purposes of this Application, my signature may take the form of a traditional "wet-ink" signature or an "electronic signature." As used here, the term "electronic signature" means any electronic sound, symbol, or process attached to or logically associated with a record and executed and adopted by a party with the intent to sign such record, including facsimile or a typed response made via email indicating agreement or assent.

   ___Yes _____No

Applicant's Acknowledgement: _____ Date _____

National Fuel CAP Features

Please Read and Keep

This information explains our Customer Assistance Program and the benefits to you as a participant.

What is CAP?

CAP provides a discount on your bill and debt forgiveness on your balance at the time of enrollment. It is a percentage of income program. As participant in CAP your bills will be reduced to 4 or 6 percent of your monthly income, based on your verified income and household size. You will either pay your percentage of income amount or your average bill, whichever is less. The minimum monthly bill amount will be $12.

How do I calculate my monthly bill?

Determine your percentage of income bill based on Federal Poverty Income Guidelines (FPIG)

- Households with a monthly income between 0 – 50% FPIG, will pay a bill of 4% of their monthly income.
- Households with a monthly income between 51 – 150% FPIG, will pay a bill of 6% of their monthly income.

Calculating your Percentage of Income Amount

(Monthly Income) x (Discount Percent) = Monthly Percentage of Income Amount

Examples:
4% Discount: $1500 x 0.04 = $60
6% Discount: $1500 x 0.06 = $90

Responsibility for Account

The gas account holder must sign the CAP application. All adult occupants are responsible for the gas utility bills at the residence where they benefited from the service.

Reward for Payment

At the time of your CAP enrollment, your account balance, if any, will be placed on hold. If you pay your bill each month, a portion of your pre-CAP balance will be eliminated and forgiven. This amount never has to be paid back. If you fall behind and miss debt forgiveness for a time period, but you then catch up your CAP payments, you will receive the debt forgiveness you missed. You will continue to receive debt forgiveness as you pay your CAP bills until the entire pre-CAP balance is forgiven. If you no longer participate in CAP, you remain responsible for any amounts that were not forgiven.

Late Payments

If you don't pay your bill while on CAP, you will be sent a termination notice. The notice amount must be paid in full or your service will be turned off. No extensions or payment arrangements will be offered. If your gas service is turned off for non-payment, you must do the following to have the gas service turned back on:

- Pay the termination notice amount (total of your missed CAP payments) plus any current bills if overdue.
- Pay a turn-on charge as defined by National Fuel's current tariff.

Identification, Proof of Income

All adults must provide satisfactory identification information and proof of income. Copies of income documents for the last 30 days or 12 months need to be provided, using whatever is more beneficial for acceptance into the CAP program. Participants of the program are required to provide household income information when requested by National Fuel. You must also notify National Fuel when any changes occur in your household size or income.

Energy Conservation

Energy saving tips will be provided that will help with usage and energy cost reduction. You may have an energy audit performed on your home. An audit can show you where you might be able to conserve energy and lower your gas bill. Our experts will check your furnace, water heater, insulation, weatherstripping and any other areas in your home where you may be able to reduce energy costs.

Weatherization

If you qualify for our weatherization program, you must agree to have your home weatherized. The Low Income Usage Reduction Program (LIURP) provides insulation and other energy saving improvements **at no cost to you.** If you are a renter, your landlord must agree to weatherization work for it to be performed. You will not be penalized if your landlord does not agree.

LIHEAP

You are required to apply for the Low-Income Home Energy Assistance Program (LIHEAP) through your county assistance office or online at **www.compass.state.pa.us**. LIHEAP is typically open from November through March. If approved and National Fuel is the utility you identified on your application, the grant will be applied to your current account balance.

- **LIHEAP Data Sharing Option:** You can easily be enrolled in CAP if you check the box on your LIHEAP application to allow the Department of Human Services (DHS) to share your household and income information with your utility.

Customer Choice

CAP eligibility is limited to those who purchase gas from National Fuel. National Fuel is unable to offer a discount on the gas you buy from another supplier.

To apply online scan the QR code or visit www.nationalfuel.com/applycap

Energy Efficiency Tips

Saving money and energy is easier than you think.

Help reduce emissions in the atmosphere and put a little more money in your pocket. Making these small, inexpensive adjustments can make a big difference!

Try these quick and easy ways to save:

- Set thermostats between 65° and 70° during the winter, and at 58° when away from the house for more than a few hours. By turning your thermostat back 10°-15° for eight straight hours, you can save about 5%-15% a year on your heating bill—a savings of as much as 1% for each degree.
- Turn down thermostats automatically without sacrificing comfort by installing a programmable thermostat.
- Change or clean furnace air filters once a month during the heating season. Furnaces consume less energy if they "breathe" more easily. Use the arrival of your natural gas bill as your reminder to change the filter.
- Warm air rises, so use registers to direct warm airflow across the floor.
- Close vents and doors in unused rooms. Close dampers on unused fireplaces.
- Set your water heater to 120° or the medium temperature setting. Drain a quart of water from the bottom of your water heating tank every three months to remove sediment that can hamper the efficiency of your unit. Water heating is a typical family's third-largest energy expense, accounting for about 14% of utility bills.
- Insulate water heaters with insulation blankets in accordance with manufacturer's guidelines.
- Install water-flow restrictors in shower heads and faucets.
- If radiators are located near cold walls, place a sheet of aluminum foil between the radiator and the wall to reflect heat back into the room.
- Run washing machines and clothes dryers with a full load.
- On sunny days, open curtains and blinds on windows that receive direct sunlight. Close them at night or on cloudy days to insulate against the cold air outside.

Keep the cold out and the costs down.

Air leaks contribute to significant energy loss. See estimates below. Reduce air leaks and cut as much as 10% from your monthly bill by using caulk or weather-stripping to seal leaks around:

- Floors, walls, ceilings (31% of energy loss)
- Ducts (15% of energy loss)
- Fireplace (14% of energy loss)
- Plumbing (13% of energy loss)
- Doors (11% of energy loss)
- Windows (10% of energy loss)
- Fans and vents (4% of energy loss)
- Electric outlets (2% of energy loss)

Income and usage eligible customers may qualify for weatherization.
For more information call us at 1-800-365-3234

National Fuel

NATIONAL FUEL EXHIBIT MS-5R

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please refer to NFG St. No. 17 (Stoops) at 3:13-16. “The Company has worked with DHS to receive income and household information for households that grant consent to share the information. This information is intended to allow customers to enroll or recertify in CAP without having to submit a new application or proof of income-eligibility.” Please specifically describe how NFG utilizes LIHEAP data received from the Pennsylvania Department of Human Services (DHS) to conduct outreach, recertification, and/or enrollment for its universal service programs. Please also provide a copy of all current letters, written communications, and/or outreach materials NFG uses to conduct outreach to LIHEAP recipients for enrollment in universal service programs.

Response

The Company receives a file from the Department of Human Services (DHS) of customers who consent to data sharing and who have their LIHEAP grant sent to the Company. When this file is received, the Company will send a customer who is not currently enrolled in CAP a simplified application, letter, and program information. If a recertification is needed, the Company will send a letter and program information advising the customer that they will continue to be on CAP.

When the customer receives this simplified application for enrollment, they are only required to choose a “Yes” or “No” response if they are willing to participate in the Company’s CAP program, sign, and date the application. The customer will then be enrolled in CAP when the signed agreement is received. The customer does not have to take any action when being recertified.

See CONFIDENTIAL Attachment Cause-PA-3-27 (1) for the Company’s simplified CAP application.

See CONFIDENTIAL Attachment Cause-PA-3-27 (2) for the Company’s recertification letter due to data sharing.

PO BOX 371835
PITTSBURGH PA 15250-7835
National Fuel®

[redacted]

Account Number: [redacted]

[redacted]

January 06, 2026

Dear [redacted]

RE: Service Address: [redacted] Account Number: [redacted]

You may be eligible for National Fuel's Customer Assistance Program (CAP). This program offers affordable monthly payments and debt forgiveness on any outstanding balance at the time you are enrolled.

When you recently applied for LIHEAP, you gave permission to the Department of Human Services (DHS) to share your household and income information with your utilities for the purpose of enrolling in their Customer Assistance Programs and other utility assistance programs.

We have reviewed your gas account and found that you are eligible for CAP. This program is a percentage of income program. Your CAP payment will be no more than 4% or 6% of your household's verified monthly income, subject to a minimum CAP payment of $12. Your CAP payment amount will be your percentage of income amount or your average bill amount, whichever is lower.

At the time of your CAP enrollment, your existing account balance, if any, will be placed on hold. If you pay your bill each month, 1/24th of your pre-CAP balance will be eliminated and forgiven. While you are on the program, you will continue to receive debt forgiveness until the entire pre-CAP balance is forgiven.

If you would like to be enrolled in CAP, National Fuel must have written authorization. It is important that you sign and return the attached agreement by **January 16, 2026** so you can be enrolled in this valuable program. Please return your information in the enclosed envelope, fax to 814-871-8250 or email to CAP@natfuel.com.

Please review the enclosed CAP FEATURES and ENERGY EFFICIENCY TIPS. They provide important information about CAP and cost-saving energy tips to help reduce your usage.

If have any questions, please call 1-800-365-3234.

Sincerely,

National Fuel
Enclosures

CAP Agreement Notification

RE: Service Address [redacted] Account Number: [redacted]

I confirm and understand that:

- The Customer Assistance Program (CAP) is a percentage of income program.
- My monthly CAP amount will be no more than 4% or 6% of my verified monthly household income, subject to a minimum payment of $12.
- My CAP payment will be my percentage of income amount or my average bill amount, whichever is less.
- All bills must be paid to receive the full benefit of CAP. If I do not pay my CAP bill, my gas service may be terminated.
- If my gas service is terminated, I must pay the notice amount, my current bills if overdue, and a reconnection charge per the Company's Tariff.
- I must promptly notify National Fuel if my household size or income changes.
- If I fail to respond when asked to update my household and income information, I will be removed from CAP.
- If I refuse energy conservation/weatherization services, I may be removed from CAP. If I rent, I will not be penalized if the landlord does not agree.
- National Fuel is my current gas supplier and must remain my gas supplier while I participate in CAP. If I choose to buy gas from another supplier, I will be removed from CAP.
- The service address must be my personal residence and gas service used at this address is for me and members of my household solely for residential purposes for heating, hot water, cooking, and drying clothes.
- I have notified all adult household members of the terms and conditions of CAP and that they are listed on the application. They have been notified they are responsible for all gas bills from the date of their enrollment until cancellation of their CAP participation.

I am interested in participating in Customer Assistance Programs with my other utilities and sharing my CAP eligibility information with them.

_____Yes ____No

By my signature, I agree to each of the following:

1. I have read and understand the contents of my CAP agreement and/or CAP application and agree to the terms and conditions of CAP.
2. I have read, reviewed, and acknowledged the enclosed CAP Features Sheet.
3. I grant permission for the disclosure and release of information from any source, individual, or organization to National Fuel concerning employment, income, public benefits received, and agencies and banking institutions to verify this information.
4. If I selected "yes" to the question concerning interest in programs with other utilities, I consent to the information provided in this CAP application to be shared with other utilities for purposes of determining eligibility for their Customer Assistance Programs.
5. To the extent National Fuel has received my income and household information from the information provided to the Pennsylvania Department of Human Services as part of my LIHEAP Application, I acknowledge that I have authorized DHS to share this information with all public utilities (including National Fuel) for purposes of, among other things, enrollment into Universal Service Programs like CAP.
6. I agree that for purposes of this Application, my signature may take the form of a traditional "wet-ink" signature or an "electronic signature." As used here, the term "electronic signature" means any electronic sound, symbol, or process attached to or logically associated with a record and executed and adopted by a party with the intent to sign such record, including facsimile or a typed response made via email indicating agreement or assent.

   ___Yes _____No

Applicant's Acknowledgement: _____ Date _____

National Fuel CAP Features

Please Read and Keep

This information explains our Customer Assistance Program and the benefits to you as a participant.

What is CAP?

CAP provides a discount on your bill and debt forgiveness on your balance at the time of enrollment. It is a percentage of income program. As participant in CAP your bills will be reduced to 4 or 6 percent of your monthly income, based on your verified income and household size. You will either pay your percentage of income amount or your average bill, whichever is less. The minimum monthly bill amount will be $12.

How do I calculate my monthly bill?

Determine your percentage of income bill based on Federal Poverty Income Guidelines (FPIG)

- Households with a monthly income between 0 – 50% FPIG, will pay a bill of 4% of their monthly income.
- Households with a monthly income between 51 – 150% FPIG, will pay a bill of 6% of their monthly income.

Calculating your Percentage of Income Amount

(Monthly Income) x (Discount Percent) = Monthly Percentage of Income Amount

Examples:
4% Discount: $1500 x 0.04 = $60
6% Discount: $1500 x 0.06 = $90

Responsibility for Account

The gas account holder must sign the CAP application. All adult occupants are responsible for the gas utility bills at the residence where they benefited from the service.

Reward for Payment

At the time of your CAP enrollment, your account balance, if any, will be placed on hold. If you pay your bill each month, a portion of your pre-CAP balance will be eliminated and forgiven. This amount never has to be paid back. If you fall behind and miss debt forgiveness for a time period, but you then catch up your CAP payments, you will receive the debt forgiveness you missed. You will continue to receive debt forgiveness as you pay your CAP bills until the entire pre-CAP balance is forgiven. If you no longer participate in CAP, you remain responsible for any amounts that were not forgiven.

Late Payments

If you don't pay your bill while on CAP, you will be sent a termination notice. The notice amount must be paid in full or your service will be turned off. No extensions or payment arrangements will be offered. If your gas service is turned off for non-payment, you must do the following to have the gas service turned back on:

- Pay the termination notice amount (total of your missed CAP payments) plus any current bills if overdue.
- Pay a turn-on charge as defined by National Fuel's current tariff.

Identification, Proof of Income

All adults must provide satisfactory identification information and proof of income. Copies of income documents for the last 30 days or 12 months need to be provided, using whatever is more beneficial for acceptance into the CAP program. Participants of the program are required to provide household income information when requested by National Fuel. You must also notify National Fuel when any changes occur in your household size or income.

Energy Conservation

Energy saving tips will be provided that will help with usage and energy cost reduction. You may have an energy audit performed on your home. An audit can show you where you might be able to conserve energy and lower your gas bill. Our experts will check your furnace, water heater, insulation, weatherstripping and any other areas in your home where you may be able to reduce energy costs.

Weatherization

If you qualify for our weatherization program, you must agree to have your home weatherized. The Low Income Usage Reduction Program (LIURP) provides insulation and other energy saving improvements **at no cost to you.** If you are a renter, your landlord must agree to weatherization work for it to be performed. You will not be penalized if your landlord does not agree.

LIHEAP

You are required to apply for the Low-Income Home Energy Assistance Program (LIHEAP) through your county assistance office or online at **www.compass.state.pa.us**. LIHEAP is typically open from November through March. If approved and National Fuel is the utility you identified on your application, the grant will be applied to your current account balance.

- **LIHEAP Data Sharing Option:** You can easily be enrolled in CAP if you check the box on your LIHEAP application to allow the Department of Human Services (DHS) to share your household and income information with your utility.

Customer Choice

CAP eligibility is limited to those who purchase gas from National Fuel. National Fuel is unable to offer a discount on the gas you buy from another supplier.

To apply online scan the QR code or visit www.nationalfuel.com/applycap

Energy Efficiency Tips

Saving money and energy is easier than you think.

Help reduce emissions in the atmosphere and put a little more money in your pocket. Making these small, inexpensive adjustments can make a big difference!

Try these quick and easy ways to save:

- Set thermostats between 65° and 70° during the winter, and at 58° when away from the house for more than a few hours. By turning your thermostat back 10°-15° for eight straight hours, you can save about 5%-15% a year on your heating bill—a savings of as much as 1% for each degree.
- Turn down thermostats automatically without sacrificing comfort by installing a programmable thermostat.
- Change or clean furnace air filters once a month during the heating season. Furnaces consume less energy if they "breathe" more easily. Use the arrival of your natural gas bill as your reminder to change the filter.
- Warm air rises, so use registers to direct warm airflow across the floor.
- Close vents and doors in unused rooms. Close dampers on unused fireplaces.
- Set your water heater to 120° or the medium temperature setting. Drain a quart of water from the bottom of your water heating tank every three months to remove sediment that can hamper the efficiency of your unit. Water heating is a typical family's third-largest energy expense, accounting for about 14% of utility bills.
- Insulate water heaters with insulation blankets in accordance with manufacturer's guidelines.
- Install water-flow restrictors in shower heads and faucets.
- If radiators are located near cold walls, place a sheet of aluminum foil between the radiator and the wall to reflect heat back into the room.
- Run washing machines and clothes dryers with a full load.
- On sunny days, open curtains and blinds on windows that receive direct sunlight. Close them at night or on cloudy days to insulate against the cold air outside.

Keep the cold out and the costs down.

Air leaks contribute to significant energy loss. See estimates below. Reduce air leaks and cut as much as 10% from your monthly bill by using caulk or weather-stripping to seal leaks around:

- Floors, walls, ceilings (31% of energy loss)
- Ducts (15% of energy loss)
- Fireplace (14% of energy loss)
- Plumbing (13% of energy loss)
- Doors (11% of energy loss)
- Windows (10% of energy loss)
- Fans and vents (4% of energy loss)
- Electric outlets (2% of energy loss)

Income and usage eligible customers may qualify for weatherization.
For more information call us at 1-800-365-3234

National Fuel

PO BOX 371835
PITTSBURGH PA 15250-7835
National Fuel®

Account Number: [redacted]

[redacted]

March 13, 2026

Dear [redacted]

RE: Service Address: [redacted] Account Number: [redacted]

You recently gave permission to the Department of Human Services (DHS) when you applied for LIHEAP to share your household and income information with your utilities for the purpose of enrolling or recertifying in their Customer Assistance Programs and other utility assistance programs.

We have reviewed your account and determined that you are eligible to continue on National Fuel's Customer Assistance Program (CAP).

Your payment is based on your household size and income that National Fuel has on file for CAP. You will pay your percentage of income amount or your average bill amount, whichever is less. The minimum CAP payment is $12.

You will be billed to CAP Tier 2 and will not pay more than 6% of your monthly income.

CAP Tier 1 – CAP payment is 4% of your household income (0-50% of the FPIG).
CAP Tier 2 – CAP payment is 6% of your household income (51-100% of the FPIG).
CAP Tier 3 – CAP payment is 6% of your household income (101 to 150% of the FPIG).

We have included a copy of the CAP Features and Energy Efficiency Tips. They explain the benefits of CAP, how to calculate your CAP amount, what you need to do to stay on the program and provide cost saving energy tips to help reduce your usage.

If your household income has changed since you applied for LIHEAP this year or if you have any questions, please contact us at 1-800-365-3234.

Sincerely,

National Fuel
Enclosures

National Fuel CAP Features

Please Read and Keep

This information explains our Customer Assistance Program and the benefits to you as a participant.

What is CAP?

CAP provides a discount on your bill and debt forgiveness on your balance at the time of enrollment. It is a percentage of income program. As participant in CAP your bills will be reduced to 4 or 6 percent of your monthly income, based on your verified income and household size. You will either pay your percentage of income amount or your average bill, whichever is less. The minimum monthly bill amount will be $12.

How do I calculate my monthly bill?

Determine your percentage of income bill based on Federal Poverty Income Guidelines (FPIG)

- Households with a monthly income between 0 – 50% FPIG, will pay a bill of 4% of their monthly income.
- Households with a monthly income between 51 – 150% FPIG, will pay a bill of 6% of their monthly income.

Calculating your Percentage of Income Amount

(Monthly Income) x (Discount Percent) = Monthly Percentage of Income Amount

Examples:
4% Discount: $1500 x 0.04 = $60
6% Discount: $1500 x 0.06 = $90

Responsibility for Account

The gas account holder must sign the CAP application. All adult occupants are responsible for the gas utility bills at the residence where they benefited from the service.

Reward for Payment

At the time of your CAP enrollment, your account balance, if any, will be placed on hold. If you pay your bill each month, a portion of your pre-CAP balance will be eliminated and forgiven. This amount never has to be paid back. If you fall behind and miss debt forgiveness for a time period, but you then catch up your CAP payments, you will receive the debt forgiveness you missed. You will continue to receive debt forgiveness as you pay your CAP bills until the entire pre-CAP balance is forgiven. If you no longer participate in CAP, you remain responsible for any amounts that were not forgiven.

Late Payments

If you don't pay your bill while on CAP, you will be sent a termination notice. The notice amount must be paid in full or your service will be turned off. No extensions or payment arrangements will be offered. If your gas service is turned off for non-payment, you must do the following to have the gas service turned back on:

- Pay the termination notice amount (total of your missed CAP payments) plus any current bills if overdue.
- Pay a turn-on charge as defined by National Fuel's current tariff.

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National Fuel

NATIONAL FUEL EXHIBIT MS-6R

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

How many households' data have NFG received from DHS since NFG started participating in the Pennsylvania Department of Human Services (DHS) Low Income Home Energy Assistance Program (LIHEAP) data sharing program? Please disaggregate by month and year, as of the last day of the month/ year, and by CAP enrollment status (enrolled or not enrolled in CAP). Please provide this data in a live Excel spreadsheet.

Response

Please see Attachment Cause-PA-6-02.

Year	Month	All	CAP Enrolled	Not CAP Enrolled
2024	October	1187	396	791
2024	November	1116	257	859
2024	December	944	237	707
2025	January	768	129	639
2025	February	539	88	451
2025	March	579	105	474
2025	April	595	156	439
2025	May	70	11	59
2025	June	4	0	4
2025	July	3	1	2
2025	August	0	0	0
2025	September	0	0	0
2025	October	0	0	0
2025	November	0	0	0
2025	December	3925	1734	2191
2026	January	803	169	634
2026	February	642	146	496

NATIONAL FUEL EXHIBIT MS-7R

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From January 2023 to date, disaggregated by month and year, as of the last day of the month/year, please provide the total dollars in debt and the average arrearage level for each of the following NFG customer segments: a) All residential NFG customers; b) Residential NFG customers, excluding confirmed low income customers and CAP customers; c) Confirmed low income NFG customers; d) Confirmed low income NFG customers, excluding CAP customers; e) NFG CAP customers. Please provide this data in a live excel spreadsheet

Response

See Attachment Cause-PA-I-26 Revised for (a) All residential NFG customers and (d) Confirmed low income NFG customers, excluding CAP customers. There is no data to report for items (b), (c), and (e) as the Company does not track this information for CAP customers. Updated data for January 2026 has been added.

See Attachment Cause-PA-I-26 (2) for available NFG CAP customer arrearages related to section (e). This separates the customers balance eligible for debt forgiveness and unpaid current bills. This data is not available for past periods and only for a current period, dated March 26th, 2026.

Year	Month	CAUSE-PA-I-26 a. (total debt) - All Res	CAUSE-PA-I-26 a. (avg. debt) - All Res	CAUSE-PA-I-26 b. (total debt) - exlude CLI and CAP	CAUSE-PA-I-26 b. (avg. debt) - exclude CLI and CAP	CAUSE-PA-I-26 c. (total debt) - CLI	CAUSE-PA-I-26 c. (avg. debt) - CLI	CAUSE-PA-I-26 d. (total debt) - CLI exlcude CAP	CAUSE-PA-I-26 d. (avg. debt) - CLI exclude CAP	CAUSE-PA-I-26 e. (total debt) - CAP	CAUSE-PA-I-26 e. (avg. debt) - CAP
2023	January	$ 7,986,351.08	$ 412.37	n/a	n/a	n/a	n/a	$ 3,759,955.17	$ 600.15	n/a	n/a
2023	February	$ 7,831,065.44	$ 447.26	n/a	n/a	n/a	n/a	$ 3,606,489.24	$ 638.77	n/a	n/a
2023	March	$ 8,433,943.67	$ 474.78	n/a	n/a	n/a	n/a	$ 3,839,671.63	$ 662.58	n/a	n/a
2023	April	$ 8,381,158.45	$ 449.61	n/a	n/a	n/a	n/a	$ 3,675,574.35	$ 609.85	n/a	n/a
2023	May	$ 7,437,414.42	$ 421.43	n/a	n/a	n/a	n/a	$ 3,024,405.55	$ 557.49	n/a	n/a
2023	June	$ 7,127,186.23	$ 387.18	n/a	n/a	n/a	n/a	$ 2,806,685.66	$ 518.70	n/a	n/a
2023	July	$ 7,088,921.08	$ 378.10	n/a	n/a	n/a	n/a	$ 2,906,572.16	$ 519.96	n/a	n/a
2023	August	$ 6,736,466.00	$ 358.86	n/a	n/a	n/a	n/a	$ 2,873,694.68	$ 508.89	n/a	n/a
2023	September	$ 7,189,709.95	$ 352.75	n/a	n/a	n/a	n/a	$ 3,084,320.06	$ 516.46	n/a	n/a
2023	October	$ 7,122,641.09	$ 364.27	n/a	n/a	n/a	n/a	$ 3,126,936.93	$ 541.84	n/a	n/a
2023	November	$ 7,287,806.89	$ 367.09	n/a	n/a	n/a	n/a	$ 3,265,948.83	$ 543.60	n/a	n/a
2023	December	$ 7,885,526.83	$ 368.57	n/a	n/a	n/a	n/a	$ 3,530,803.32	$ 557.70	n/a	n/a
2024	January	$ 8,125,593.13	$ 402.28	n/a	n/a	n/a	n/a	$ 3,793,306.85	$ 584.57	n/a	n/a
2024	February	$ 7,662,799.20	$ 424.34	n/a	n/a	n/a	n/a	$ 3,563,026.36	$ 600.44	n/a	n/a
2024	March	$ 7,765,969.69	$ 424.21	n/a	n/a	n/a	n/a	$ 3,509,134.19	$ 576.97	n/a	n/a
2024	April	$ 7,005,208.11	$ 395.62	n/a	n/a	n/a	n/a	$ 3,095,151.48	$ 513.29	n/a	n/a
2024	May	$ 6,238,829.09	$ 352.20	n/a	n/a	n/a	n/a	$ 2,598,272.50	$ 471.04	n/a	n/a
2024	June	$ 6,040,026.95	$ 320.60	n/a	n/a	n/a	n/a	$ 2,391,865.91	$ 439.20	n/a	n/a
2024	July	$ 5,623,437.21	$ 304.68	n/a	n/a	n/a	n/a	$ 2,317,235.29	$ 434.92	n/a	n/a
2024	August	$ 5,392,107.81	$ 284.63	n/a	n/a	n/a	n/a	$ 2,269,511.15	$ 411.44	n/a	n/a
2024	September	$ 5,461,082.89	$ 278.98	n/a	n/a	n/a	n/a	$ 2,316,175.94	$ 404.43	n/a	n/a
2024	October	$ 5,387,737.51	$ 288.89	n/a	n/a	n/a	n/a	$ 2,327,608.78	$ 421.74	n/a	n/a
2024	November	$ 5,743,387.00	$ 299.67	n/a	n/a	n/a	n/a	$ 2,529,802.70	$ 443.36	n/a	n/a
2024	December	$ 6,163,254.65	$ 309.65	n/a	n/a	n/a	n/a	$ 2,648,062.04	$ 445.35	n/a	n/a
2025	January	$ 6,691,221.02	$ 345.12	n/a	n/a	n/a	n/a	$ 3,001,928.42	$ 475.14	n/a	n/a
2025	February	$ 6,915,930.38	$ 383.24	n/a	n/a	n/a	n/a	$ 3,148,449.11	$ 510.20	n/a	n/a
2025	March	$ 6,863,431.83	$ 390.03	n/a	n/a	n/a	n/a	$ 2,983,780.97	$ 499.71	n/a	n/a
2025	April	$ 5,978,204.85	$ 348.20	n/a	n/a	n/a	n/a	$ 2,487,172.24	$ 434.82	n/a	n/a
2025	May	$ 5,601,004.80	$ 329.61	n/a	n/a	n/a	n/a	$ 2,250,741.45	$ 416.88	n/a	n/a
2025	June	$ 5,486,368.91	$ 318.09	n/a	n/a	n/a	n/a	$ 3,164,216.82	$ 590.67	n/a	n/a
2025	July	$ 5,424,187.30	$ 315.95	n/a	n/a	n/a	n/a	$ 2,278,459.43	$ 423.35	n/a	n/a
2025	August	$ 5,279,798.66	$ 304.35	n/a	n/a	n/a	n/a	$ 2,204,066.08	$ 430.15	n/a	n/a
2025	September	$ 5,298,732.04	$ 301.85	n/a	n/a	n/a	n/a	$ 2,199,232.04	$ 434.89	n/a	n/a
2025	October	$ 5,562,166.39	$ 315.73	n/a	n/a	n/a	n/a	$ 2,771,254.72	$ 481.96	n/a	n/a
2025	November	$ 6,341,839.43	$ 338.16	n/a	n/a	n/a	n/a	$ 3,235,491.16	$ 513.49	n/a	n/a
2025	December	$ 6,937,670.90	$ 368.01	n/a	n/a	n/a	n/a	$ 3,492,726.78	$ 565.81	n/a	n/a
2026	January	$ 7,895,373.34	$ 415.63	n/a	n/a	n/a	n/a	$ 4,107,714.03	$ 614.56	n/a	n/a

Year	Month	CAUSE-PA-I-26 e. (total debt - elligible for debt forgiveness) - CAP	CAUSE-PA-I-26 e. (avg. debt) - CAP	CAUSE-PA-I-26 e. (total debt - unpaid current bills) - CAP	CAUSE-PA-I-26 e. (avg. debt) - CAP
2026	March	$ 1,328,570.35	$ 201.30	$ 291,014.01	$ 205.37

NATIONAL FUEL EXHIBIT MS-8R

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please refer to the September 2024 NFG LIURP Needs Assessment prepared by APPRISE and available on the Commission's website at https://www.puc.pa.gov/pcdocs/1853360.pdf. Please confirm that this is the most recent LIURP needs assessment completed for NFG and that there are no other LIURP needs assessments that have not yet been approved. If NFG has prepared and submitted a needs assessment that has not yet been approved, please provide a copy. Please also specifically describe any changes that NFG implemented as a result of the September 2024 LIURP needs assessment.

Response

The September 2024 LIURP Needs Assessment prepared by APPRISE is the most recent LIURP needs assessment completed by the Company and there are no assessments pending approval.

As a result of the 2024 LIURP Needs Assessment, the Company has increased its outreach efforts to improve awareness of the program. These steps include attending new events and locations across the service territory where more information was available at these events to inform attendees about LIURP. The Company has also taken steps to find contractors who can handle additional and more consistent work. These efforts have proven to be successful as the Company has seen an increase in LIURP spending and LIURP jobs completed as seen in response Cause-PA-II-14.

NATIONAL FUEL EXHIBIT MS-9R

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

For January 2023 to date, disaggregated by month and year, as of the last day of the month/year, please indicate the average LIURP per job cost and total LIURP dollars spent, disaggregated by the following customer segments for NFG: a) All LIURP recipients; b) Homeowners; c) Tenants; d) Single family homes; e) Multifamily, single metered homes; and f) Multifamily, master metered homes. Please provide this data in a live Excel spreadsheet.

Response

See Attachment Cause-PA-II-14.xlsx.

Section A: All LIURP recipients

Year-Month	Total Spent	Total Jobs Completed	Average Cost
2023	$551,132.18	78	$7,065.80
2023-01	$81,096.30	14	$5,792.59
2023-02	$38,114.77	4	$9,528.69
2023-03	$39,968.04	6	$6,661.34
2023-04	$21,513.95	3	$7,171.32
2023-05	$51,855.04	7	$7,407.86
2023-06	$42,753.25	8	$5,344.16
2023-07	$19,858.14	3	$6,619.38
2023-08	$58,729.94	8	$7,341.24
2023-09	$54,757.53	8	$6,844.69
2023-10	$53,608.71	6	$8,934.79
2023-11	$88,876.51	11	$8,079.68
2023-12	$0.00	0	$0.00
2024	$765,770.30	101	$7,581.88
2024-01	$56,661.66	8	$7,082.71
2024-02	$37,221.06	4	$9,305.27
2024-03	$40,291.04	5	$8,058.21
2024-04	$75,031.48	10	$7,503.15
2024-05	$44,336.48	5	$8,867.30
2024-06	$58,955.94	7	$8,422.28
2024-07	$96,968.54	14	$6,926.32
2024-08	$107,315.41	17	$6,312.67
2024-09	$92,804.16	10	$9,280.42
2024-10	$102,069.40	15	$6,804.63
2024-11	$44,732.54	5	$8,946.51
2023-12	$9,382.59	1	$9,382.59
2025	$1,289,646.41	187	$6,896.50
2025-01	$116,326.22	18	$6,462.57
2025-02	$129,871.90	24	$5,411.33
2025-03	$94,731.10	16	$5,920.69
2025-04	$104,324.31	14	$7,451.74
2025-05	$74,766.85	11	$6,796.99
2025-06	$116,802.09	21	$5,562.00
2025-07	$143,906.69	19	$7,574.04
2025-08	$100,253.78	16	$6,265.86
2025-09	$138,331.44	16	$8,645.72
2025-10	$173,285.61	21	$8,251.70
2025-11	$87,108.23	10	$8,710.82
2025-12	$9,938.19	1	$9,938.19
2026	$188,470.87	23	$8,194.39
2026-01	$144,167.48	17	$8,480.44
2026-02	$44,303.39	6	$7,383.90

Section B: Homeowners

Year-Month	Total	Total Completed	Average
2023	$420,022.74	57	$7,368.82
2023-01	$61,837.17	10	$6,183.72
2023-02	$38,114.77	4	$9,528.69
2023-03	$27,063.38	4	$6,765.85
2023-04	$14,734.93	2	$7,367.47
2023-05	$45,212.53	6	$7,535.42
2023-06	$30,256.39	6	$5,042.73
2023-07	$16,361.25	2	$8,180.63
2023-08	$44,438.15	6	$7,406.36
2023-09	$38,590.61	5	$7,718.12
2023-10	$47,456.99	5	$9,491.40
2023-11	$55,956.57	7	$7,993.80
2023-12	$0.00	0	$0.00
2024	$607,162.92	75	$8,095.51
2024-01	$40,465.80	5	$8,093.16
2024-02	$37,221.06	4	$9,305.27
2024-03	$34,120.62	4	$8,530.16
2024-04	$56,441.79	7	$8,063.11
2024-05	$33,483.14	3	$11,161.05
2024-06	$38,122.74	5	$7,624.55
2024-07	$70,880.79	9	$7,875.64
2024-08	$78,627.85	12	$6,552.32
2024-09	$76,514.44	7	$10,930.63
2024-10	$96,552.15	14	$6,896.58
2024-11	$44,732.54	5	$8,946.51
2023-12	$0.00	0	$0.00
2025	$840,795.34	120	$7,006.63
2025-01	$94,957.32	13	$7,304.41
2025-02	$91,912.45	18	$5,106.25
2025-03	$47,188.89	6	$7,864.82
2025-04	$38,895.32	7	$5,556.47
2025-05	$52,510.66	7	$7,501.52
2025-06	$81,616.68	16	$5,101.04
2025-07	$75,934.97	10	$7,593.50
2025-08	$69,899.81	10	$6,989.98
2025-09	$81,230.46	9	$9,025.61
2025-10	$138,384.29	16	$8,649.02
2025-11	$58,326.30	7	$8,332.33
2025-12	$9,938.19	1	$9,938.19
2026	$88,379.70	10	$8,837.97
2026-01	$76,979.49	8	$9,622.44
2026-02	$11,400.21	2	5700.105

Section C: Tenants

Year-Month	Total	Total Completed	Average
2023	$131,109.44	21	$6,243.31
2023-01	$19,259.13	4	$4,814.78
2023-02	0	0	0
2023-03	$12,904.66	2	$6,452.33
2023-04	$6,779.02	1	$6,779.02
2023-05	$6,642.51	1	$6,642.51
2023-06	$12,496.86	2	$6,248.43
2023-07	$3,496.89	1	$3,496.89
2023-08	$14,291.79	2	$7,145.90
2023-09	$16,166.92	3	$5,388.97
2023-10	$6,151.72	1	$6,151.72
2023-11	$32,919.94	4	$8,229.99
2023-12	$0.00	0	$0.00
2024	$158,607.38	26	$6,100.28
2024-01	$16,195.86	3	$5,398.62
2024-02	$0.00	0	$0.00
2024-03	$6,170.42	1	$6,170.42
2024-04	$18,589.69	3	$6,196.56
2024-05	$10,853.34	2	$5,426.67
2024-06	$20,833.20	2	$10,416.60
2024-07	$26,087.75	5	$5,217.55
2024-08	$28,687.56	5	$5,737.51
2024-09	$16,289.72	3	$5,429.91
2024-10	$5,517.25	1	$5,517.25
2024-11	$0.00	0	$0.00
2023-12	$9,382.59	1	$9,382.59
2025	$448,851.07	67	$6,699.27
2025-01	$21,368.90	5	$4,273.78
2025-02	$37,959.45	6	$6,326.58
2025-03	$47,542.21	10	$4,754.22
2025-04	$65,428.99	7	$9,347.00
2025-05	$22,256.19	4	$5,564.05
2025-06	$35,185.41	5	$7,037.08
2025-07	$67,971.72	9	$7,552.41
2025-08	$30,353.97	6	$5,059.00
2025-09	$57,100.98	7	$8,157.28
2025-10	$34,901.32	5	$6,980.26
2025-11	$28,781.93	3	$9,593.98
2025-12	$0.00	0	$0.00
2026	$100,091.17	13	$7,699.32
2026-01	$67,187.99	9	$7,465.33
2026-02	$32,903.18	4	$8,225.80

Section D: Single Family Homes

Year-Month	Total	Total Completed	Average
2023	$551,132.18	78	$7,065.80
2023-01	$81,096.30	14	$5,792.59
2023-02	$38,114.77	4	$9,528.69
2023-03	$39,968.04	6	$6,661.34
2023-04	$21,513.95	3	$7,171.32
2023-05	$51,855.04	7	$7,407.86
2023-06	$42,753.25	8	$5,344.16
2023-07	$19,858.14	3	$6,619.38
2023-08	$58,729.94	8	$7,341.24
2023-09	$54,757.53	8	$6,844.69
2023-10	$53,608.71	6	$8,934.79
2023-11	$88,876.51	11	$8,079.68
2023-12	$0.00	0	$0.00
2024	$744,478.59	99	$7,519.99
2024-01	$56,661.66	8	$7,082.71
2024-02	$37,221.06	4	$9,305.27
2024-03	$18,999.33	3	$6,333.11
2024-04	$75,031.48	10	$7,503.15
2024-05	$44,336.48	5	$8,867.30
2024-06	$58,955.94	7	$8,422.28
2024-07	$96,968.54	14	$6,926.32
2024-08	$107,315.41	17	$6,312.67
2024-09	$92,804.16	10	$9,280.42
2024-10	$102,069.40	15	$6,804.63
2024-11	$44,732.54	5	$8,946.51
2023-12	$9,382.59	1	$9,382.59
2025	$1,289,646.41	187	$6,896.50
2025-01	$116,326.22	18	$6,462.57
2025-02	$129,871.90	24	$5,411.33
2025-03	$94,731.10	16	$5,920.69
2025-04	$104,324.31	14	$7,451.74
2025-05	$74,766.85	11	$6,796.99
2025-06	$116,802.09	21	$5,562.00
2025-07	$143,906.69	19	$7,574.04
2025-08	$100,253.78	16	$6,265.86
2025-09	$138,331.44	16	$8,645.72
2025-10	$173,285.61	21	$8,251.70
2025-11	$87,108.23	10	$8,710.82
2025-12	$9,938.19	1	$9,938.19
2026	$188,470.87	23	$8,194.39
2026-01	$144,167.48	17	$8,480.44
2026-02	$44,303.39	6	$7,383.90

Section E: Multifamily, single metered homes

N/A

Section F: Multifamily, master metered homes

Year-Month	Total	Total Completed	Average
2023	$0.00	0	$0.00
2023-01	$0.00	0	$0.00
2023-02	$0.00	0	$0.00
2023-03	$0.00	0	$0.00
2023-04	$0.00	0	$0.00
2023-05	$0.00	0	$0.00
2023-06	$0.00	0	$0.00
2023-07	$0.00	0	$0.00
2023-08	$0.00	0	$0.00
2023-09	$0.00	0	$0.00
2023-10	$0.00	0	$0.00
2023-11	$0.00	0	$0.00
2023-12	$0.00	0	$0.00
2024	$21,291.71	2	$10,645.86
2024-01	$0.00	0	$0.00
2024-02	$0.00	0	$0.00
2024-03	$21,291.71	2	$10,645.86
2024-04	$0.00	0	$0.00
2024-05	$0.00	0	$0.00
2024-06	$0.00	0	$0.00
2024-07	$0.00	0	$0.00
2024-08	$0.00	0	$0.00
2024-09	$0.00	0	$0.00
2024-10	$0.00	0	$0.00
2024-11	$0.00	0	$0.00
2023-12	$0.00	0	$0.00
2025	$0.00	0	$0.00
2025-01	$0.00	0	$0.00
2025-02	$0.00	0	$0.00
2025-03	$0.00	0	$0.00
2025-04	$0.00	0	$0.00
2025-05	$0.00	0	$0.00
2025-06	$0.00	0	$0.00
2025-07	$0.00	0	$0.00
2025-08	$0.00	0	$0.00
2025-09	$0.00	0	$0.00
2025-10	$0.00	0	$0.00
2025-11	$0.00	0	$0.00
2025-12	$0.00	0	$0.00
2026	$0.00	0	$0.00
2026-01	$0.00	0	$0.00
2026-02	$0.00	0	$0.00

NATIONAL FUEL EXHIBIT MS-10R

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please indicate for each year from January 2022 to date disaggregated by year, as of the last day of the year, whether: a) NFG exhausted its LIURP budget; b) If such budget was not exhausted, the number of dollars not spent; c) If such budget was exhausted, the number of NFG customers who did not receive LIURP services despite having been found to be LIURP eligible. Please provide this data in a live Excel spreadsheet.

Response

See Attachment Cause-PA-II-10.xlsx. Note that the Company does not have the information in section (c) as this information is not tracked.

Section A	
Year	NFG exhausted its LIURP budget
2022	No
2023	No
2024	No
2025	No
2026	N/A

Section B	
Year	If such budget was not exhausted, the number of dollars not spent
2022	$2,088,596.46
2023	$2,367,861.62
2024	$2,311,157.99
2025	$1,450,879.24
2026	N/A

Section C	
Year	If such budget was exhausted, the number of NFG customers who did not receive LIURP services despite having been found to be LIURP eligible
2022	N/A
2023	N/A
2024	N/A
2025	N/A
2026	N/A

NATIONAL FUEL EXHIBIT MS-11R

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Assuming that NFG treats an identical number of low income units as will be treated through LIURP in the current fiscal year, and assuming no unit will be retreated, please indicate the number of years it would take to treat 100% of the low income units identified in the above requested needs assessment(s).

Response

The 2024 LIURP Needs Assessment provided by APPRISE states that there are approximately 213,493 households in the Company's territory with gas bills, of which 18% are low-income customers (38,429). Using the best available data, the Company completed a total of 187 LIURP jobs in calendar year 2025. With this information, it would take the Company approximately 206 years to treat 100% of these eligible households in its service territory. However, not all low-income customers would meet the yearly consumption threshold level of 1300 CCF for LIURP or 900 CCF for LC-LIURP.

NATIONAL FUEL EXHIBIT MS-12R

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

For January 2023 to date, disaggregated by month and year (as of the last day of the month/year), please indicate for NFG: a) The average amount of approved hardship fund grants; b) The total dollar value of approved hardship fund grants; c) The total grant dollars available through the hardship fund program; d) The total administrative cost of the hardship fund program; e) Any months in which hardship fund grant funding was fully depleted. Please provide this data in a live Excel spreadsheet.

Response

See Attachment Cause-PA-II-21.

Year	Month	a) CAUSE-PA-II-21	b) CAUSE-PA-II-21	c) CAUSE-PA-II-21	d) CAUSE-PA-II-21	e) CAUSE-PA-II-21
2023	January	$427.91	$2,995.36	$298,445.69	$2,705.00	No
2023	February	$387.80	$15,124.30	$296,153.93	$855.00	No
2023	March	$341.03	$8,866.83	$283,756.84	$525.00	No
2023	April	$426.72	$12,374.78	$277,771.08	$3,425.00	No
2023	May	$411.20	$7,812.83	$266,067.97	$1,590.00	No
2023	June	$342.86	$13,028.60	$260,143.54	$105.00	No
2023	July	$383.08	$12,258.62	$250,919.22	$2,500.00	No
2023	August	$377.22	$21,124.35	$236,160.60	$1,240.00	No
2023	September	$380.13	$21,287.31	$309,483.39	$5,995.00	No
2023	October	$361.96	$13,030.51	$281,784.46	$245.00	No
2023	November	$355.84	$7,828.52	$272,068.82	$0.00	No
2023	December	$381.59	$6,487.02	$265,627.80	$6,987.02	No
2024	January	$366.03	$1,830.17	$256,995.78	$0.00	No
2024	February	$322.97	$6,782.30	$262,442.99	$910.00	No
2024	March	$355.42	$8,885.39	$246,527.33	$2,755.00	No
2024	April	$347.03	$5,552.50	$243,817.30	$0.00	No
2024	May	$372.89	$21,254.98	$225,190.13	$0.00	No
2024	June	$329.41	$8,894.11	$217,187.88	$2,240.00	No
2024	July	$391.60	$9,006.78	$207,236.10	$945.00	No
2024	August	$398.86	$17,948.63	$191,332.98	$0.00	No
2024	September	$361.96	$13,030.51	$275,894.63	$0.00	No
2024	October	$378.64	$15,902.87	$261,236.69	$0.00	No
2024	November	$406.90	$7,324.14	$254,097.60	$1,365.00	No
2024	December	$433.24	$7,798.29	$250,376.67	$0.00	No
2025	January	$350.24	$9,806.83	$246,269.62	$0.00	No
2025	February	$351.93	$2,815.45	$227,328.57	$0.00	No
2025	March	$357.40	$21,443.95	$214,248.40	$175.00	No
2025	April	$375.99	$19,175.24	$198,453.84	$0.00	No
2025	May	$374.62	$40,833.06	$154,964.70	$2,770.00	No
2025	June	$380.85	$25,516.98	$128,502.72	$945.00	No
2025	July	$402.79	$25,778.38	$105,863.62	$0.00	No
2025	August	$414.22	$40,179.72	$60,652.78	$5,395.00	No
2025	September	$414.16	$38,516.50	$123,827.59	$6,945.00	No
2025	October	$428.27	$28,693.96	$79,629.67	$0.00	No
2025	November	$383.74	$37,606.20	$45,147.18	$0.00	No
2025	December	$350.81	$12,629.04	$29,612.52	$3,015.00	No
2026	January	$355.12	$13,139.52	$16,852.65	$2,520.00	No

NATIONAL FUEL EXHIBIT MS-13R

Question

Is NFG proposing to implement any changes to its Universal Services and Energy Conservation Plan (USECP) Programs in the context of the present proceeding? If so, please specifically describe any proposed change to NFG's USECP Program(s) NFG proposes, including the timeline for implementing changes.

Response

The Company did not initially propose any changes to its USECP. However, given the current level of funding of the Neighbor for Neighbor program, the Company is evaluating certain changes that will facilitate its efforts to better support customers who are most in need of assistance. These proposed changes are as follows:

1. Making income a mandatory criterion; applicants need to meet both the income requirement (0-200%) and one other specified/current requirement to qualify.
2. Limiting the program to only National Fuel Gas customers.
3. Flexibility to change the grant amount based on demand.

Question

Please refer to NFG's response to CAUSE-PA I-2, indicating that NFG is evaluating for its hardship fund "Flexibility to change the grant amount based on demand." Please specifically explain: a) What specific flexibility NFG is evaluating related to changes to grant amounts based on demand; b) Whether and to what extent the flexibility would vary by any factor (e.g. customer income level, any non-income eligibility criteria, county). Please also provide a copy of all current or proposed written policies, procedures, or other documents which discuss NFG providing flexibility to change hardship fund grant amounts based on demand.

Response

a) The Company is evaluating the ability to introduce flexibility in the hardship fund grant amounts awarded based on demand. This flexibility will allow the Company to continue operating the program and support customers consistently throughout the year.

   Specifically, the Company is evaluating modifying the hardship fund program guidelines to allow:

   - The maximum grant amount to be adjusted downward during periods of elevated demand or reduced fund balances; and/or
   - The program administrator to adjust grant amounts based on overall program demand and available funding, with the goal of assisting a greater number of eligible customers over the course of the program year.

   Under these modifications, the hardship fund would continue to provide meaningful assistance to eligible applicants, but individual awards could be adjusted to help prevent premature depletion of the fund and avoid temporary program suspensions.

b) At this time, the Company is not evaluating flexibility that would vary by factors such as customer income level, non-income eligibility criteria, or geographic location.

   Eligibility criteria and screening requirements would continue to apply uniformly across applicants.

Rather, the flexibility under consideration relates to program level conditions, such as overall demand for grants during a given period and the availability of program funds relative to projected need.

Grant amounts would continue to be determined through the existing intake and review process based on an applicant's circumstances and documented need, but within adjusted program parameters intended to preserve the availability of assistance throughout the year.

No formal written policy or procedure has been finalized or adopted that specifically governs flexibility to change hardship fund grant amounts based on demand.

NATIONAL FUEL EXHIBIT MS-14R

Company (NGDCs)	Avg No. Res Custs (2024)	Avg PAR per Cust	Rank	PARs (Q1-4 2024)	Avg per month
Columbia	412,989	0.15%	1	616	51
NFG	196,629	0.16%	2	311	26
Peoples	596,064	0.18%	3	1071	89
UGI	630,289	0.65%	4	4128	344
PGW	481,593	1.00%	5	4793	399

Company (NGDCs)	Avg No. Res Custs (2024)	Avg PAR per Cust	Rank	PARs (Q1-3 2025)	Avg per month
Columbia	412,989	0.12%	1	484	54
NFG	196,629	0.13%	2	262	29
Peoples	596,064	0.14%	3	858	95
UGI	630,289	0.44%	4	2758	306
PGW	481,593	0.59%	5	2856	317

January through December 2024

Company	Residential Consumer Complaints	Residential PARs
Columbia	130	616
National Fuel Gas (NFG)	57	311
Peoples	323	1,071
Philadelphia Gas Works (PGW)	740	4,793
UGI Gas	320	4,128
Total	**1,570**	**10,919**

January through September 2025

Company	Residential Consumer Complaints	Residential PARs
Columbia	134	484
National Fuel Gas (NFG)	57	262
Peoples	328	858
Philadelphia Gas Works (PGW)	517	2,856
UGI Gas	280	2,758
Total	**1,316**	**7,218**

Appendix C: Average Number of Residential Customers

12-Month Average Number of Residential Customers 2024 – NGDCs

Company	Average Number of Residential Customers*
Columbia	412,989
NFG	196,629
Peoples	596,064
PGW	481,593
UGI Gas	630,289
Total	**2,317,564**

*The number of residential customers for the electric, gas and water utilities is a 12-month average drawn from reports required by Chapter 56 at § 56.231(a)(1)(2).

NATIONAL FUEL EXHIBIT MS-15R

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Provide a copy of the disconnection notice used by the Company for Pennsylvania residential customers.

Response

See Attachment OCA III-08.pdf.

1 RELIEF ST
OIL CITY, PA 16301

National Fuel

[redacted]

2602

Account Number: [redacted]

Make Check Payable to:
National Fuel

Amount Due To
Avoid Shut-off:
$158.50

Please bring this notice to the attention of the utility when paying bill.

A-04-66C-TM-00024

[redacted]

[redacted]

00000000000000000000001585000 2

OC

03

February 11, 2026

10 DAY SHUT-OFF NOTICE
AVISO DE SUSPENCION DE SERVICIO

Your Gas Service May Be Shut Off!
Because your bill is past due, we will shut-off the gas service to [redacted] at a time legally authorized on or after 8:00am on **April 01, 2026. We may act on this notice for up to 60 days.**

We will NOT shut off your gas service if you do ONE of the following:
o Call us at 1-800-365-3234 to arrange to pay your past due bill of $158.50.
o Pay the amount you owe on your payment plan. Call us at 1-800-365-3234 for this amount.
o Show us a paid receipt for the past due amount.
o **Call 1-800-365-3234 right away** if you dispute this bill or to **provide us with household income and occupant information.** You may be eligible for a payment agreement or special assistance programs.

If we shut off your gas service, you may have to pay all of the following before we can turn your service on:

Past Due Bill	$158.50
Security Deposit	$0.00
Turn-on Charge	$69.00
Total	**$227.50**

***To talk about your bill, please call our office at 1-800-365-3234.**

MEDICAL EMERGENCY NOTICE

Let us know if someone living in your home is seriously ill or has a diagnosed medical condition which requires the continuation of service to treat the medical condition. **WE WILL NOT SHUT OFF YOUR SERVICE** provided you:
(a.) Have a licensed physician, physician assistant, or nurse practitioner certify by phone or in writing that a serious illness or medical condition exists in the household that requires continuation of service to treat the medical condition; and
(b.) Make some equitable arrangement to pay the company your current bills for service.
(c.) Contact us by calling the following number:
1-800-365-3234
1 RELIEF ST OIL CITY, PA 16301

(d.) Have your licensed physician, physician assistant, or nurse practitioner send a letter to the utility within 7 days verifying the medical condition.

IMPORTANT TO KNOW
Before we shut off your utility service please read the back of this notice. You may be eligible for certain protections from shut off.

Atencion! Este es en mensaje muy importante. Si usted no lo entiende, favor de llama a 1-800-365-3234.

IMPORTANT TO KNOW - BEFORE WE SHUT OFF YOUR UTILITY SERVICE

- If you have questions or need more information, please call us today at 1-800-365-3234. After you talk with us, if you are not satisfied, you may file a complaint with the Public Utility Commission (PUC). The PUC may delay the shut off if you file the complaint before the shut off date. To contact them call 1-800-692-7380 or write to: Pennsylvania Public Utility Commission, PO BOX 3265 HARRISBURG, PA 17105-3265.
- **If we shut off your service during the winter months (between Dec. 1 - Mar. 31)** we will restore your service within 24 hours of your meeting all requirements/conditions to have service reconnected. Where street digging is required, it may take up to 7 days.
- If you currently have a valid Protection from Abuse order or a valid court order which provides clear evidence of domestic violence against you the service cannot be terminated during the winter without PUC permission. There are some additional protections available to you. **Call us immediately at 1-800-365-3234.** (You will be required to provide us with a copy of the order.)
- You may be eligible for a payment agreement or special assistance programs. **Call 1-800-365-3234 right away** to **provide us with household income and occupant information**. Documentation of your income may be required, such as pay stubs or tax documents.
- **If your landlord pays your utility bill: You have certain legal protections.** Please call us at 1-800-365-3234.
- If you have trouble understanding or speaking English or have a disability please call us at 1-800-365-3234 for free interpretation.
- If your service is shut off, you may be required to pay more than the amount listed on the front of this notice to have your service turned back on. You may have to pay any additional bills that have become past due.
- All adult occupants of the premise whose names are on the mortgage, deed, or lease are considered the 'customer' and are responsible for payment of this bill.
- If service is shut off, ANY adult occupant who has been living at the premise may have to pay all or portions of this bill to have service restored.
- If your service is shut off, you must contact us after your payment has been made to be sure you have met all conditions to have the service turned back on and to arrange access to your premises.
- After all conditions have been met to have the service turned back on, it may take up to seven days to have your service restored. Please contact us to discuss the details.

WINTER NOTICE PROVISIONS (between December 1 - March 31)

- **Contact us BEFORE the shut off date** to give us household income & occupant information to see if you qualify for any assistance programs.
- **If your income is at or below 250% of the federal poverty guidelines, we must first ask the PUC for permission to shut off your service.** Add together the monthly income of the adults in your household. If that number is the same or less than the amount listed in chart below for your household size, call us immediately at 1-800-365-3234. You may need to provide us with proof of your income.

Monthly Income at 250% of Federal Poverty 2026				
Household Size	1	2	3	4
Monthly Income	$3,325.00	$4,508.00	$5,691.00	$6,875.00

Add $1183.00 for each additional household member

Atencion ! Este es en mensaje muy importante. Si usted no lo entiende, favor de llama a 1-800-365-3234.

National Fuel®

30-DAY SHUT-OFF NOTICE TO TENANTS

Address [redacted] Date February 12, 2026

(Service Address) [redacted] Account Number [redacted]

WARNING: YOUR NATIONAL FUEL GAS SERVICE MAY BE SHUT OFF ON OR AFTER 03/14/2026 BECAUSE OF INSUFFICIENT PAYMENT.

TO STOP THE SHUTOFF OF YOUR UTILITY SERVICE YOU MUST DO ONE OF THE FOLLOWING THINGS:

1. You can join with the other tenants to pay the National Fuel bill for the last month or you can pay the total bill yourself. Either way, you do not have to pay a deposit or get credit granted in your name. You will not have to pay your landlord's other debts or the debts of prior tenants. The utility service will remain in the name of the landlord.
2. By law, you may deduct your payments to National Fuel from your rent, due now or in the future. We will tell your landlord how much you paid for that utility service.

ADDITIONAL INFORMATION

1. The bill which must be paid to continue service is $178.91
2. Your landlord cannot punish you if you pay the utility bill. Your landlord cannot raise your rent, cannot evict you and cannot take action against you in any other way for paying the utility bill and deducting it from your rent.
3. You have the right to dispute the accuracy of the bill and have certain other rights. If you would like further information regarding these rights, contact National Fuel at 1-800-365-3234.
4. You must make the payment directly to National Fuel. Please contact us at 1-800-365-3234 for instructions to submit payment. We may require you to provide some form of identification such as:
   - Driver's License
   - Photo Identification
   - Medical Assistance Identification
   - Food Stamp Identification
   - Any similar document from a local city, state or federal government agency that lists your name and address.

DO YOU HAVE ANY QUESTIONS?

If you have any questions about your utility service, please contact National Fuel at 1-800-365-3234, 7:00 a.m. to 6:00 p.m. weekdays. After you talk with us, if you are not satisfied, you may contact the Pennsylvania Public Utility Commission. You may do so by calling the Public Utility Commission at its toll free number, which is 1-800-692-7380, or writing: Pennsylvania Public Utility Commission, P.O. Box 3265, Harrisburg, PA 17105-3265. **YOU SHOULD CALL OR WRITE BEFORE THE SHUTOFF. TO AVOID SHUTOFF, WE MUST RECEIVE YOUR LETTER BEFORE THE SHUTOFF DATE**.

IF THERE IS A SERIOUS ILLNESS

5. Let us know if anyone living in your home is seriously ill. We will not shut off your service during this illness as long as you do all of the following three steps.
   1. Contact us immediately; and
   2. Have a doctor certify by telephone or in writing:
      - The name of the person who is seriously ill, and
      - What kind of illness it is , and
      - How long the person will be ill, and
      - The illness will be worse if you do not have service; and
   3. Make arrangements for paying, if necessary.

National Fuel

Telephone Inquiries and Service

1-800-365-3234
Phone lines are open from 7:00 am to 6:00 pm
Monday through Friday, except holidays.

Consumer Assistance Centers - Drop Box Payments only

Erie	1100 State Street	PA 16501
Oil City Area	1 Relief St.	PA 16301

Pennsylvania Emergency Telephone

All Emergencies at Anytime 1-800-444-3130

CUSTOMERS WITH HEARING DISABILITIES (TDD/TTY)

Dial 7-1-1 or 1-800-662-1220

For Gas Emergencies provide Relay Operator with: 1 -800-444-3130
For Billing/Service provide Relay Operator with: 1-814-871-8200

PO BOX 371835
PITTSBURGH PA 15250-7835
National Fuel
[redacted]

Account Number: [redacted]

B-01-VAV-HM-00009-1
[redacted]

February 06, 2026

37 DAY SHUT-OFF NOTICE FOR LANDLORD RATEPAYER

Name: [redacted] Account: [redacted]
Address: [redacted] Past Due Amount: $281.07

Your Service May Be Shut Off
Because your bill is seriously past due, we will shut off the gas service to [redacted] on or after 8:00am on March 15, 2026.

We Will NOT Shut Off Your Service If You Do ONE Of The Following:
- Pay the past-due amount in full before March 15, 2026.
- Show us a paid receipt for the past due amount.
- Call the number below right away to make payment arrangements.

Your Tenants Will Be Notified
We will notify your tenants on or after February 13, 2026 that we will shut the service off. At that time, we will also inform them of their rights under Pennsylvania law.

Pennsylvania law states that you must give us the names and addresses of all tenants the shut-off will affect within seven (7) days of the date you receive this notice, unless you pay the total past-due amount or make satisfactory payment arrangements with us. You may have to pay a civil penalty of up to $500 for each day you do not give us this tenant information. Call us at 1-800-365-3234 or write to us at National Fuel, PO BOX 2081 ERIE, PA 16512.

If We Shut Off Your Tenants' Service...
If we shut off your tenants' service, you will have to pay the following before we can turn it back on:
- The Past Due Amount and a Turn-On Charge and a Security Deposit equal to two months of average billing.

We may not be able to restore your service until the close of the next business day.

To File A Complaint...
To talk about your bill, please call us at the number on the reverse Monday through Friday from 7:00am to 6:00pm.

AFTER you talk with us, if you are not satisfied, you have a legal right to file a complaint with the Public Utility Commission. You may do so by calling the Public Utility Commission toll-free at 1-800-692-7380 or by writing: Pennsylvania Public Utility Commission, PO BOX 3265 HARRISBURG, PA 17105-3265.

If you file a complaint within seven (7) days of the date on this notice, we will not notify your tenant(s) that we will shut their service off. Also, we will not shut the service off until the PUC settles your complaint.

If There is a Serious Illness...
Let us know if anyone living at this service address is seriously ill. We will not shut off your service during this illness as long as you do all of the following three steps:
(1) Contact us immediately; and
(2) Make arrangements for paying the past-due bill; and
(3) Have a doctor certify by telephone or in writing: (a) The name of the person who is seriously ill; and (b) What kind of illness it is; and (c) How long the person will be ill; and (d) The illness will be worse if you do not have service.

cc: Department of Health

National Fuel Gas Distribution Corporation

Telephone Inquiries and Services
Erie Area Customers: 814-871-8200
All other Customers: 1-800-365-3234
7:00 am to 6:00 pm, Monday through Friday, except holidays

Customer Assistance Centers – Drop Box Payments only
Erie: 1100 STATE ST ERIE, PA 16501
Oil City: 1 RELIEF ST OIL CITY, PA 16301

Customers with Hearing Disabilities (TDD/TTY)
Dial 7-1-1 or 1-800-662-1220
For Gas Emergencies at any time provide the Relay Operator with 1-800-444-3130
For Billing/Service between 7:00 am and 6:00 pm provide Relay Operator with 1-800-365-3234

NATIONAL FUEL EXHIBIT MS-16R

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From January 2023 to date, disaggregated by month and year (as of the last day of the month/year), please provide: a) The number of hardship fund grant applications NFG received from NFG non-customers; b) The number of non-customers who received a hardship fund grant; c) The number of hardship fund grants issued to NFG non-customers; d) The total dollar amount of NFG hardship fund grants issued to NFG non-customers. Please provide this data in a live Excel spreadsheet.

Response

See Attachment Cause-PA-4-20. Note that for section (a), the number of applications received is not tracked. Sections (b) and (c) would be the same number.

Year	Month	b) The number of non-customers who received a hardship fund grant; c) The number of hardship fund grants issued to NFG non-customers	d) The total dollar amount of NFG hardship fund grants issued to NFG non-customers
2023	January	0	$ -
2023	February	2	$ 600.00
2023	March	6	$ 1,444.19
2023	April	0	$ -
2023	May	1	$ 300.00
2023	June	0	$ -
2023	July	0	$ -
2023	August	0	$ -
2023	September	2	$ 785.38
2023	October	4	$ 1,200.00
2023	November	3	$ 869.91
2023	December	7	$ 1,900.00
2023 Total		25	$ 7,099.48
2024	January	0	$ -
2024	February	3	$ 800.00
2024	March	5	$ 1,505.34
2024	April	2	$ 500.00
2024	May	2	$ 600.00
2024	June	0	$ -
2024	July	0	$ -
2024	August	0	$ -
2024	September	0	$ -
2024	October	6	$ 1,711.00
2024	November	2	$ 500.00
2024	December	5	$ 1,400.00
2024 Total		25	$ 7,016.34
2025	January	6	$ 1,800.00
2025	February	12	$ 3,600.00
2025	March	13	$ 3,576.00
2025	April	7	$ 2,100.00
2025	May	3	$ 797.40
2025	June	0	$ -
2025	July	0	$ -
2025	August	1	$ 300.00
2025	September	2	$ 468.00
2025	October	2	$ 592.95
2025	November	35	$ 10,497.66
2025	December	7	$ 1,844.94
2025 Total		88	$ 25,576.95

NATIONAL FUEL EXHIBIT MS-17R

Smell gas? Leave fast!

Then call **1-800-444-3130.** Natural gas is efficient and economical. It's delivered to your home or business through a safe, underground pipeline system, but safety also depends on you.

While natural gas is naturally colorless and odorless, National Fuel adds a rotten egg smell so you will know if there is a leak.

If you smell gas:

DO

- Leave the premises immediately.
- Call National Fuel's emergency line – **1-800-444-3130** – from a different location.

DON'T

- Turn any electrical switch on or off.
- Light any matches.

For gas emergencies, call 1-800-444-3130, 24 hours a day, seven days a week.

National Fuel®

Please recycle

Go Paperless

The easiest way to receive your National Fuel invoice and help the environment is to enroll in paperless billing. With paperless billing, a notification is forwarded to your preferred e-mailed address registered through your online account, and an image of your bill, current balance and due date information, along with reminder notices, are provided. A confirmation e-mail that your payment has been processed is also provided for your records.

Register for paperless billing by creating a new account or logging into your existing National Fuel online account. Benefits of an online account include the ability to enroll in automatic payments, view payment history, sign up for budget billing, and submit meter reads.

Go paperless by scanning the QR code below or visiting **NationalFuel.com**.

Have a billing question?

If you have a billing question, problem or request, please call us Monday through Friday, 7 a.m. to 6 p.m.

Erie-area: 814-871-8200

All other areas: 1-800-365-3234

Or visit **NationalFuel.com** for more information.

Customers with hearing or speech difficulties are able to communicate with us on electronic display (TTY or teletypewriter) and can have a relay call placed to us by calling **711**.

For more information, including translation services, please call **1-800-365-3234**.

Para más información, incluyendo servicios de traducción, por favor llame al **1-800-365-3234**.

Struggling to Pay Your Winter Heating Bills?

We're here to help you weather any storm.

At National Fuel, we constantly strive to take care of our neighbors and the communities we serve. From energy affordability programs to payment plans and more, we're providing ways for eligible homes to maintain their energy needs throughout the winter:

Low Income Home Energy Assistance Program (LIHEAP) — This federal grant program helps income-eligible customers. You may be eligible to receive a one-time grant of up to $1,000. Funding is limited and will be distributed on a first-come, first-served basis.

***LIHEAP Data Sharing Option** — Easily enroll in National Fuel's Customer Assistance Program (CAP) by checking the box on your LIHEAP application to allow the Department of Human Services to share your household and income Information with your utility.

To see if you qualify, visit **LIHEAPhelps.com**.

Call or visit your local county assistance office to apply, and be sure to apply in the county where you live. You can also apply quickly and easily online at **www.compass.state.pa.us**.

To view LIHEAP income qualifications, visit LIHEAPhelps.com.

LIHEAP Crisis Grants — If you are without service or have received a shut-off notice, you may be eligible for a crisis grant of up to $1,000. I**f applying for a crisis grant, you will need a shut-off notice or a form from the utility to have service restored.**

Customer Assistance Program (CAP) — Affordable payments based on household size and income, plus your existing balance can be forgiven. To apply, visit **www.nationalfuel.com/applycap**.

Low-Income Usage Reduction Program (LIURP) — This program, mandated by the Pennsylvania Utility Commission, provides weatherization aid for customers who meet income/consumption requirements.

Neighbor for Neighbor — Provides a one-time grant up to $500 for those struggling with energy bills. Eligibility includes one of the following: disability, certified medical emergency, at least 55 years old, recently unemployed, veteran, experience a verifiable loss of income, or household income between 0-200% poverty level.

Customer Assistance Referral and Evaluation Service (CARES) — Payment arrangements and assistance referrals for customers facing hardships.

AutoPay Payment Plan — Automatically deduct your monthly payment from your checking or savings accounts on the bill due date. Never forget to pay your gas bill again!

Budget Plan — Plan ahead with a stabilized monthly bill for up to one year. This plan divides your estimated annual bill into either 10 or 12 payments.

Deferred Payment Arrangement — If you are unable to make your payment, please call us as soon as possible. You may be asked to provide income information. Based on that, a deferred payment arrangement may be made.

For more details about these programs, visit: **WeatherAnyStormPA.com**

Fueling Tomorrow Today | Winter 2026

Important Gas Safety Reminders

This winter, make sure your home isn't only warm, but is also safe!

Carbon Monoxide Safety

Carbon monoxide (CO) is an odorless, colorless and dangerous gas. It's released when appliances that use natural gas aren't working properly. Prevent carbon monoxide poisoning and learn the symptoms.

Following our CO Safety Checklist can keep your family safe.

- Have your chimney, appliances and heating equipment inspected and tested by a qualified professional annually.
- Install ventless heaters in accordance with manufacturer specifications and at least one CO detector in your home.
- Clear snow and ice from appliance exhaust and intake air vents.
- Keep vents and flues free of debris.

Follow these CO safety tips:

- Never rely on CO detectors as a substitute for maintaining appliances, heating equipment or chimneys.
- Never use a gas oven or stovetop for heating.
- Never use ventless heaters as a primary heating source.
- Never run gasoline engines (such as gas generators) or automobiles in an enclosed space.
- Never use a portable charcoal or propane grill indoors.

Know CO poisoning symptoms:

- Fatigue
- Coughing
- Headache
- Irregular breathing
- Dizziness
- Overall paleness
- Nausea
- Cherry red lips and ears

Keep CO Safety top of mind. If you suspect carbon monoxide poisoning, go outside immediately. Then call **9–1–1**.

To learn more about and download our CO Safety Checklist, visit **cosafety.info** or scan the QR code with a smartphone.

Pay Attention to Outdoor Gas Meters, Furnaces and Vents

Natural gas furnaces and fireplaces have a vent pipe or flue that sends exhaust and gaseous byproducts outside via a chimney or pipe. Furnace exhaust vents can become clogged by debris, ice or snow, causing the furnace to shut off or operate inefficiently. Blocked vents can also lead to buildup of carbon monoxide inside a residence.

Natural Gas Detectors

Like smoke and CO detectors, natural gas detectors are available and will sound an audible alarm or voice alert when a natural gas leak is detected. When gas is detected, leave the premises immediately and call National Fuel's emergency line, **1–800–444–3130**, or **9–1–1** from a safe distance, approximately 330 feet away (about the length of a football field). Natural gas detectors are available at home improvement stores and online.

Be Mindful of Wintery Conditions

Snow, ice and extreme cold temperatures can pose a variety of issues for heating systems. Ensure outdoor gas meter safety and proper service by:

- Keeping the meter and surrounding area free of snow and ice, including your gutters.
- Clearing paths to the meter.
- Informing those working, plowing or snow blowing of the meter location.
- Not letting children play on the meter.
- Exercising caution when removing icicles on the meter or area above it.
- Calling National Fuel, **1–800–365–3234**, if a meter becomes encased in ice.

Utility Scams

Customers are reminded that

- National Fuel employees **DO NOT** conduct door-to-door sales. Any salesperson wearing a hard hat, another article of clothing, or accessories commonly associated with utility employees is not likely a National Fuel employee.
- National Fuel employees **DO NOT** visit homes to view gas bills, sign agreements or discuss account matters unless related to collections.
- National Fuel employees **DO** visit homes for operational purposes, including meter reading, construction work and gas emergencies. Employees carry identification cards and will produce them without resistance if asked.

Helpful Tips to Lower Energy Usage

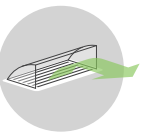
Energy Efficiency Tips

Making small and inexpensive adjustments in your home can help to reduce emissions in the atmosphere and put a little more money in your pocket.

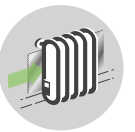
- **Reduce air leaks** — Use caulk or weather-stripping to seal leaks around floors, walls, ceilings, ducts, fireplaces, plumbing, doors, windows, fans, vents and outlets.

- **Lower the thermostat** — Turn back your thermostat by 10°-15°. Programmable thermostats allow you to automatically turn down the temperature.

- **Change or clean air filters** — Cleaning furnace air filters once a month during the heating season helps it to "breathe" more easily and consume less energy.



- **Control warm airflow** — As heat rises, use registers to direct warm airflow across the floor. Close vents and doors in unused rooms and dampers on unused fireplaces to keep warm air where you want it.

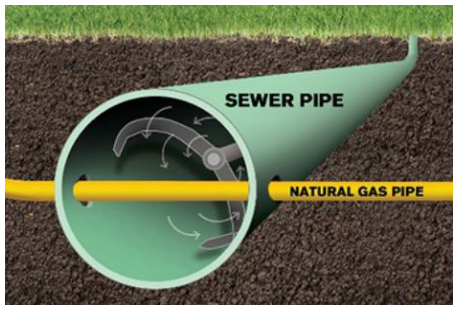


- **Reflect heat** — If radiators are located near cold walls, place a sheet of aluminum foil between the radiator and the wall to reflect heat into the room.

- **Use sunlight** — Open curtains and blinds to let in direct sunlight, but close them at night or on cloudy days.

Cross Bore Sewer Line Safety

A cross bore occurs when an underground utility is unintentionally installed through another existing utility or structure using trenchless construction technology. In rare cases, a natural gas line may be unknowingly installed through a sanitary or storm sewer and can be hazardous when the sewer line becomes blocked, requiring mechanical equipment to clear it.



Improper cross bores can lead to incidents resulting in property damage, injury and even death. National Fuel takes extensive measures to ensure that our trenchless construction practices are minimally invasive and safe.

If you suspect a cross bore blockage but are unable to visually verify one does not exist, follow these precautionary measures before you attempt to clear a sewer blockage beyond the outside wall of a building:

- Notify PA One Call at **8–1–1** for underground utility locations to determine if the blockage is in the vicinity of utility lines.
- If you suspect a sewer blockage was caused by a natural gas line, call National Fuel at **1–800–444–3130**.
- If you find a cable cross bored through the sewer, please call your local electric or telecommunications utility.

graphic: courtesy of PA1Call.org

Fueling Tomorrow Today | Winter 2026

Smell gas? Leave fast!

Then call **1-800-444-3130**. Natural gas is efficient and economical. It's delivered to your home or business through a safe, underground pipeline system, but safety also depends on you.

While natural gas is naturally colorless and odorless, National Fuel adds a rotten egg smell so you will know if there is a leak.

If you smell gas:

DO

- Evacuate the premises immediately.
- After evacuating the premises, call National Fuel's emergency line at **1-800-444-3130** to let us know of suspected gas leak.

DON'T

- Stay inside the premises.
- Turn any electrical switch on or off as this may create a spark.
- Light any matches.

For gas emergencies, call 1-800-444-3130, 24 hours a day, seven days a week.

Have a billing question?

If you have a billing question, problem or request, please call us Monday through Friday, 7 a.m. to 6 p.m.

Erie-area: 1-814-871-8200

All other areas: 1-800-365-3234

Or visit **NationalFuel.com** for more information.

Customers with hearing or speech difficulties are able to communicate with us on electronic display (TTY or teletypewriter) and can have a relay call placed to us by calling **711**.

For more information, including translation services, please call **1-800-365-3234**.

Para más información, incluyendo servicios de traducción, por favor llame al **1-800-365-3234**.

Keep Your Information Current

National Fuel encourages you to always keep your account information up to date. It is especially important that we have your most current phone number and email address on file so we can reach you regarding scheduled maintenance and repairs or to provide notice of outages or emergencies in your area.

Update your phone number, mailing address, email address and view other important account information by signing into or creating an NFG online account.

To update your account information:

- Visit **NationalFuel.com**.
- Call **1-800-365-3234** to speak with a customer service representative.

National Fuel®

Please recycle

Make Sure You Know What's Below & Call Before You Dig!

Did you know that approximately 3 million miles of pipelines efficiently, safely and reliably deliver natural gas every day to around 77 million American homes and businesses? As warm weather brings on more time outdoors and home-improvement projects, it is important to know what's below ground before starting any digging projects, especially in the vicinity of pipeline markers.

Most pipelines are not visible, so pipeline markers serve a critical role in alerting that a pipeline is in the area. Pipeline markers indicate the pipeline's approximate location, product carried and the pipeline operator's contact information, but don't assume a pipeline isn't present when there is no marker.

Before picking up a shovel, make sure to have the underground utilities on your property marked. By calling **811** or visiting **pa1call.org**, you can request to have professional locators mark underground utilities for free.

In Pennsylvania, the law requires residents and contractors to call **811** at least three but no more than 10 business days in advance of the start of a project to allow local utilities to mark the approximate location of and prevent accidental damage to underground lines.

Safe digging is no accident, it's the law. Call **811** before:

- Planting or removing trees, flower beds or bushes.
- Installing fences, drainage, mailboxes, etc.
- Grading yards and removing dirt.
- Anchoring supports for decks and swing sets.

When you call **811**:

- Local utilities will send a professional to conduct a FREE site survey and mark the underground lines on your property.
- Once your underground lines have been marked, you will know the approximate location of your utility lines.
- Respect the marks and dig with care using hand tools near underground lines.
- Have an emergency plan.

If you damage a natural gas line, contact National Fuel immediately at **1-800-444-3130**. Even minor damage to a pipeline may cause a leak or failure, so please,

Fueling Tomorrow Today | Summer 2025

Summer Safety

Tips for a fun and safe summer!

Keep Your Dog Safe

We love dogs, but we don't love dog bites. Any dog can bite. It is not a dog's breed that determines whether it will bite, but rather the dog's individual history and behavior. Dogs bite for a variety of reasons, but most commonly as a situational reaction. Whether you're receiving scheduled service or we're on your property for a meter reading, please keep these tips in mind:

1. Make sure your dog is in a separate, enclosed area before answering the door.
2. If service is being done outside your home, keep your dog in the house even if you have invisible fencing.
3. Remember, for their safety, employees are instructed to never pet or interact with dogs while they are on the job.
4. Pay attention to your dog's body language. A tensed body, stiff tail, pulled-back ears and intense stare mean your dog is uncomfortable and may feel the need to bite.
5. If you believe your dog is going to attack, try to place something between the dog and the representative, like a purse or backpack.

Following these tips will help minimize dangerous situations — not only for the safety of our employees but for your dogs, too!

Natural Gas Generators

Having a standby natural gas generator can be very helpful when unexpected power outages occur at your home or business.

Manufacturers of these products do not recommend their use by customers to supply power to critical life support equipment (LSE). It is dangerous and potentially deadly to operate LSE with a home backup generator. Customers with LSE that lose electric service should immediately call 911 in an emergency, or call their electric utility to advise of loss of service and receive further instruction.

If you or someone you know uses LSE at home, be sure to contact your electric utility provider to enroll in their Life Support Equipment program. While enrollment doesn't guarantee uninterrupted electric service, those programs provide information and notifications to help customers using LSE stay informed, prepared and safe during an electrical outage.

Natural Gas Meter Safety

Damage to meters can cause hazardous natural gas leaks. Follow these important safety tips when working around natural gas meters:

- Maintain 2 feet of clearance when mowing or trimming around meters.
- Use hand tools to landscape within the 2-foot buffer zone.
- Do not hang or lean tools on or against meters.
- Use caution when trimming tree branches and shrubs near meters.
- Do not leave equipment parked in front of meters.
- Keep mulch or garden rocks at least 6 inches below the bottom of gas meters.
- Plant shrubbery away from gas meters to allow access in the event of an emergency.

Customer Meter Read Program

National Fuel is scheduled to read most meters every other month. The Company offers a program that advises customers when to submit meter reads on the opposite months to avoid estimated bills. Estimated bills are based on the amount of gas used at your service address for the same or similar time period from the previous year. When enrolled in the program, a document will be sent annually with the dates to submit meter reads in addition to automated reminder calls when a reading is due. Customers will be auto-enrolled into the program if we have not received a customer or Company read in approximately 4 months.

Enrollment in the program is easy and can be done with a quick call to **1-800-365-3234**.

You do not have to be enrolled in the Customer Meter Read Program to submit meter reads. Readings can be submitted by calling **1-888-634-7323**, emailing NFG_CustSVS@natfuel.com or at NationalFuel.com/meter-reading.

Excess Flow Valves

What are they and why you might be interested?

Excess flow valves are an optional device for National Fuel customers. Where conditions permit their use, National Fuel can install an Excess Flow Valve (EFV) on your natural gas service line (the underground line that runs from the main-line to the meter).

EFVs are designed to shut off the flow of natural gas automatically in the rare instance that the service line breaks or is damaged. These infrequent incidents are primarily caused by excavation damage.

A customer may request that National Fuel install an EFV on an existing gas service line on a mutually agreeable date, at a cost ranging from approximately $1,200 to $2,000 depending on the service size and the scope of the required installation work.

To install, National Fuel would need to excavate the service line at its connection to the gas mainline that runs down your street. Gas service will be turned off, the EFV installed, the excavation backfilled and your appliances relit. In some situations, we may need to replace your entire gas service at no additional cost.

An EFV must be sized to operate properly under your current natural gas usage conditions. Significant future usage increases or the installation of a natural gas emergency generator or pool heater may require the replacement of an EFV at an additional cost.

To learn more, search "EFV" on NationalFuel.com and complete the EFV form, or scan the QR code below.

Behind on your energy bills? We're here to help.

No matter why you fall behind, making progress is easier with a coach in your corner. If you or someone you know is struggling to pay bills, call a Catch-up Coach at **1-800-365-3234** or visit NationalFuel.com/CatchUp. Together, we'll find the support programs and payment options to get back on track, including:

Neighbor for Neighbor Heat Fund – Provides a one-time grant up to $500 for those struggling with energy bills. Eligibility includes one of the following: disability, certified medical emergency, at least 55 years old, recently unemployed, veteran, experience of verifiable loss of income, or household member between 0-200% poverty level.

Customer Assistance Program (CAP) – Affordable payments based on household size and income plus your existing balance can be forgiven. To apply, visit NationalFuel.com/applycap

Low-Income Usage-Reduction Program (LIURP) – Energy saving weatherization to homes for customers who meet income/consumption requirements.

Customer Assistance Referral and Evaluation Service (CARES) – Payment arrangements and assistance referrals for customers facing hardships.

Budget Plan – Stable monthly payments to know how much each heating bill will be.

Payment Arrangements – Extended payment terms for customers who are unable to pay their bill.

Scan the QR code to discover more ways that we can help you catch up.

Fueling Tomorrow Today | Summer 2025

IMPORTANT INFORMATION

National Fuel offers programs to assist customers with managing their gas bills and energy usage.

- **Low Income Residential Assistance Program (LIRA)** – Income eligible households can receive rate discounts between 10% and 80%, monthly debt forgiveness on existing pre-LIRA balances until completely forgiven, and educational resources on how to reduce energy burdens through energy conservation measures. Income information is required for all adult household members. Visit www.dollarenergy.org and select "MyApp" to apply.
- **Low Income Usage Reduction Program (LIURP)** – Home weatherization for customers who meet income and usage requirements. Includes an in home energy audit, cost saving tips and energy savings enhancements to the home, **at no cost**, to help reduce energy usage, in turn lowering energy bills.
- **Neighbor for Neighbor** – Helps customers meet basic energy needs. Eligibility includes any of the following: disabled, have a certified medical emergency, at least 55 years old, recently unemployed, veteran, verifiable loss of income within the last 30 days or household income between 0% and 200% of the federal poverty guidelines.
- **Customer Assistance Referral and Evaluation Services (CARES)** – Case management approach for customers facing hardships. Includes payment arrangements and program referrals.

For more information call, 1-800-365-3234

National Fuel®

Assistance Programs and Payment Options

- **Budget Plan** – Plan ahead with a stabilized monthly bill. This plan divides your estimated annual bill into 12 payments.
- **Payment Arrangements** – If you are unable to make your payment, we can set up extended payment plans for your account.
- **Low-Income Home Energy Assistance Program (LIHEAP)** – This federally funded program provides heating assistance to income eligible customers. Visit www.compass.state.pa.us to apply.
  - **LIHEAP CASH** – Qualifying households can receive a grant toward their utility bills.
  - **LIHEAP CRISIS** – For households experiencing a heating emergency. Funds available to assist with termination notices, restoration of service, and with broken heating equipment or leaking lines.
- **Emergency Rental Assistance Program (ERAP)** – A federally funded program that was created to help renters dealing with challenges related to the COVID-19 pandemic. Eligible tenant households may receive assistance with paying rent as well as utility and home energy bills. Visit www.compass.state.pa.us to apply.
- **Pennsylvania Home Owner Assistance Fund (PAHAF)** – A federally funded program to assist income eligible homeowners who experienced a financial hardship as a result of the COVID-19 pandemic for mortgage and housing related expenses, including utility bills. Visit www.pahaf.com to apply.

We're here to help.

Please call us today at **1-800-365-3234** to speak with one of our customer service representatives.

Atencion! Este es en mensaje muy importante. Si usted no lo entiende, favor de llama a **1-800-365-3234**.

For more information on these programs, scan the QR code or visit us online at www.nationalfuel.com.

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PA 3/23

NATIONAL FUEL STATEMENT NO. 18

ERIK M. SOLOMON

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 18

Direct Testimony of Erik M. Solomon

Topics Addressed: **Energy Efficiency Program**
Research, Development & Demonstration
Competitive Assessment

Dated: **January 28, 2026**

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Erik M. Solomon. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. By whom and in what capacity are you employed?

A. I am employed by National Fuel Gas Distribution Corporation ("NFGDC") as Senior Director of the Energy Services department.

Q. Please provide your educational background.

A. I graduated from the State University of New York at Buffalo in 1998 with a Bachelor of Science degree in Business Administration. In 2003, I earned a Master of Business Administration degree from St. Bonaventure University.

Q. Please provide your professional experience.

A. I began my career with National Fuel Gas Supply Corporation in June 1998 as a Transportation & Exchange Representative. Over the years, I have held a variety of roles with increasing responsibility. Early in my tenure, I joined NFGDC's Gas Supply Administration department, where I managed gas procurement, off-system sales, capacity release, and gas scheduling activities. In 2005, I transitioned to the Energy Services department as a General Energy Consultant, focusing on sales and customer service for large volume assigned accounts. My responsibilities included developing customer

relationships and supporting key account management. In 2020, I was promoted to Area Manager, overseeing sales, marketing, customer service, economic development, and research, development & demonstration ("RD&D") functions for NFGDC's New York Division ("National Fuel – NY"). Building on this experience, in 2023 I advanced to the role of Senior Director, where I now lead sales, marketing, customer service, economic development, and RD&D activities for National Fuel – NY and NFGDC's Pennsylvania Division ("National Fuel" or "Company").

Q. Have you previously testified in other proceedings before the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission") or any other state or federal agency?

A. Yes. I have testified on behalf of the Company in a Pennsylvania rate case at Docket No. R-2022-3035730 and before the New York Public Service Commission on behalf of National Fuel – NY in Case 23-G-0627.

II. PURPOSE OF TESTIMONY

Q What is the purpose of your testimony?

A. The purpose of my testimony is to present and support National Fuel's proposals and positions in this rate case, focusing on three core areas: the introduction of a comprehensive Energy Efficiency Program, the continuation and enhancement of RD&D initiatives, and the Company's strategic response to evolving competitive threats within the Pennsylvania marketplace.

Q. How is your testimony structured?

A. First, I will outline the rationale and expected benefits of launching a multi-year Energy Efficiency Program designed to deliver measurable energy savings, reduce customer bills, and support environmental sustainability. This program is modeled on successful approaches already approved for other Pennsylvania natural gas utilities and is structured to comply with PAPUC guidelines. It features targeted rebates and outreach strategies to ensure equitable access and participation across its residential customer segment.

Second, my testimony will detail the necessity of sustained investment in RD&D activities, which are critical for advancing innovative technologies, improving system reliability, and supporting long-term decarbonization goals. I will demonstrate how these initiatives, funded through both traditional and Delta Fund mechanisms, position National Fuel and its customers to benefit from ongoing industry innovation and the adoption of proven, cost-effective solutions.

Finally, I will provide an overview of the competitive environment in National Fuel's service territory, describing the nature and extent of bypass competition risk and explaining how the Company evaluates and responds to threats from both inter-fuel and intra-fuel competition. This includes a discussion of strategies for retaining at-risk customers, such as the use of negotiated rates, and the impact of these efforts on system throughput, revenues, and rate stability.

Throughout my testimony, I will provide evidence and analysis to demonstrate that the Company's activities and proposed programs are prudent, cost-effective, and aligned with regulatory best practices. My goal is to ensure that National Fuel continues to deliver

safe, reliable, and affordable natural gas service while advancing the interests of our customers and the communities we serve.

Q. Are you sponsoring any exhibits in this proceeding?

A. Yes, I am sponsoring the following exhibits:

- National Fuel Exhibit EMS-1 – Proposed Energy Efficiency Program
- National Fuel Exhibit EMS-2 – 2025 Delta Funds Report
- National Fuel HIGHLY CONFIDENTIAL Exhibit EMS-3 – Existing Bypass
- National Fuel HIGHLY CONFIDENTIAL Exhibit EMS-4 – Potential Bypass
- National Fuel HIGHLY CONFIDENTIAL Exhibit EMS-5 – List of Bypass Contracts

III. ENERGY EFFICIENCY PROGRAM

Q. Does the Company currently offer Energy Efficiency ("EE") programs to its customers?

A. No. However, National Fuel is proposing an EE program in this rate proceeding.

Q. Does the Company have any experience running an EE program?

A. Yes. National Fuel – NY has been running a comprehensive energy efficiency program for over 17 years. During the 17 years, the NY residential rebate program issued over 251,000 residential rebates and spent over $53.7 million on incentives.

Q. Please describe the proposed EE program.

A. National Fuel proposes implementing a comprehensive EE program over a five-year period beginning in October 2026. This program is designed to provide rebate incentives for residential customers to encourage the installation of high-efficiency natural gas appliances.

Q. Please describe the proposed EE program's rebates to residential customers.

A. The program includes the following measures for eligible customers:

1. Space Heating: Rebates for high-efficiency furnaces and boilers, which are among the largest contributors to natural gas consumption in buildings. For residential customers, rebates range from $150 to $700 depending on the equipment type and efficiency level (e.g., upgrading from 80% Annual Fuel Utilization Efficiency ("AFUE") to 95%+ AFUE).
2. Water Heating: Incentives for upgrading to high-efficiency water heaters, including tankless models. Rebates range from $50 to $300 for qualifying upgrades.
3. Clothes Dryers: Incentives for ENERGY STAR® certified natural gas clothes dryers. Rebates would be $100.

Q. What are the expected rebate costs for the EE Program?

A. See Table 1 on the following page.

Table 1: Energy Efficiency Program Projected Rebate Costs

Rebate Costs	FY27	FY28	FY29	FY30	FY31	Total
Space Heating	$289,455	$289,455	$289,455	$289,455	$289,455	$1,447,275
Water Heating	$161,922	$161,922	$161,922	$161,922	$161,922	$809,610
Clothes Dryers	$25,349	$25,349	$25,349	$25,349	$25,349	$126,745
Total	$476,726	$476,726	$476,726	$476,726	$476,726	$2,383,630

Q. Please describe the cost of the proposed EE program.

A. See Table 2 for the five-year projected costs.

Table 2: Energy Efficiency Program Annual Budgets

Budget Item	FY27	FY28	FY29	FY30	FY31	Total
Rebates	$476,726	$476,726	$476,726	$476,726	$476,726	$2,383,630
Administration	$100,000	$100,000	$100,000	$100,000	$100,000	$500,000
Evaluation, Measurement & Verification	$60,000	$60,000	$60,000	$60,000	$60,000	$300,000
Outreach/Marketing/ Trade Ally Co-op	$100,000	$85,000	$75,000	$50,000	$50,000	$360,000
Total	$736,726	$721,726	$711,726	$686,726	$686,726	$3,543,630

Q. How does National Fuel propose to recover the costs associated with the EE Program?

A. National Fuel proposes to recover the costs of the EE Program through a dedicated rider. This recovery mechanism will encompass all reasonable and prudently incurred costs directly associated with program administration, marketing, customer rebates, and evaluation activities. Furthermore, the program will be reconciled annually to ensure accurate cost recovery and compliance with approved budgets. Any annual overspend or underspend will be carried forward throughout the five-year program term.

Q. What are the expected participation goals for the EE Program?

A. The participation estimate presented in Table 3 was informed by National Fuel – NY's experience managing its Conservation Incentive Program. Drawing from those early pilot program stages, we anticipate preliminary participation targets of 0.5% of our eligible customer base annually, as the program will remain on the conservative side. Once the program matures and awareness among customers and contractors grows, participation may increase; however, for initial planning purposes, we are using 0.5% as the estimate across all equipment types and efficiency levels. Refer to the National Fuel Exhibit EMS-1 – Proposed Energy Efficiency Program, for more details.

Table 3: Energy Efficiency Program Participation

Category	FY27	FY28	FY29	FY30	FY31	Total
Space Heating	822	822	822	822	822	4,110
Water Heating	926	926	926	926	926	4,630
Clothes Dryers	253	253	253	253	253	1,265
Total	2,001	2,001	2,001	2,001	2,001	10,005

Q. What are the expected Mcf savings for the EE Program?

A. National Fuel utilized the standardized energy savings calculations and assumptions outlined in the New York State Technical Resource Manual at the measure level to estimate energy savings presented in Table 4.

Table 4: Energy Efficiency Program Energy Savings (Mcf)

Category	FY27	FY28	FY29	FY30	FY31	Total
Space Heating	8,629	8,629	8,629	8,629	8,629	43,145
Water Heating	2,592	2,592	2,592	2,592	2,592	12,960
Clothes Dryers	30	30	30	30	30	150
Total	11,251	11,251	11,251	11,251	11,251	56,255

Q. What are the expected savings for the participants in dollars for the EE Program?

A. National Fuel referenced the Rate Summary – October 2025, as published on the Company's public website under the Residential Sales Service table. The posted rate of $8.84 was applied to the Mcf savings to calculate the anticipated dollar savings seen in Table 5.

Table 5: Energy Efficiency Program Energy Savings ($)

Category	FY27	FY28	FY29	FY30	FY31	Total
Space Heating	76,280	76,280	76,280	76,280	76,280	381,400
Water Heating	22,911	22,911	22,911	22,911	22,911	114,555
Clothes Dryers	269	269	269	269	269	1,345
Total	99,460	99,460	99,460	99,460	99,460	497,300

Q. What cost-effectiveness methodology was used to evaluate the proposed EE program?

A. National Fuel evaluated the proposed EE Program using the Total Resource Cost ("TRC") test consistent with the PUC Order Adopted on November 7, 2024, at Docket No. M-2024-3048998.

Q. Please describe the TRC analysis conducted for the proposed EE program.

A. Pursuant to applicable state regulations, the TRC test is applied to determine whether the net present value ("NPV") of avoided monetary costs of supplying natural gas exceed the NPV of the monetary costs of implementing energy efficiency measures over their effective life, not to exceed 15 years.

Q. Please describe the benefits considered under the TRC analysis.

A. The analysis considered avoided supply costs, including reductions in natural gas procurement and delivery costs valued at marginal cost. Benefits were calculated using gross program savings, consistent with compliance methodology.

Q. Please describe the costs considered under the TRC analysis.

A. The analysis considered all program and participant costs, including equipment, installation, and administrative expenses, regardless of payer. Incremental measure costs were applied for services and equipment.

Q. Please describe the results of the TRC analysis.

A. The TRC analysis ensures that ratepayers receive greater benefits in reduced natural gas consumption, capacity, and other resource savings, than the total costs incurred to achieve those benefits, consistent with statutory objectives. The results are summarized in Table 6 below:

Table 6: TRC Analysis Results

Metric	Value
TRC Benefits	$3,923,073
TRC Costs	$3,842,601
Net Benefits	$ 80,472
TRC Ratio	1.02

Q. What are the additional benefits of the proposed EE program?

A. The proposed EE Program delivers a range of additional benefits listed below.

- Environmental Benefits: The EE Program reduces natural gas consumption, which directly lowers greenhouse gas emissions and other air pollutants.
- Societal Benefits: The program enhances comfort and safety in homes through improved heating systems, water heating, and clothes drying.
- Economic Development: By incentivizing equipment upgrades and energy-saving installations, the EE Program stimulates local economic activity. Contractors, suppliers, and service providers benefit from increased demand for energy-efficient products and services.
- Energy Equity: The EE program is designed to ensure equitable access to energy efficiency measures across diverse customer segments, including renters and underserved communities.

Q. How will underserved communities or low-income customers benefit from this EE program?

A. National Fuel believes the Company's proposed approach not only aligns with the cost recovery framework established under Act 129 for electric utilities but also represents a fair and practical solution to support low-income customers while advancing energy efficiency goals. Under this proposal, if a low-income customer is exempt from paying Rider D and chooses to participate in the EE Program, the associated costs would be equitably shared among the broader residential customer class—consistent with established regulatory precedent for socializing costs that deliver system-wide benefits.

Moreover, National Fuel intends to leverage its existing Emergency Heating Repair and

Replacement Program ("ERRP") to further assist self-identified low-income customers who report being without heat. By integrating ERRP with the EE Program, the Company can remove one of the most significant barriers to participation, the upfront cost of high-efficiency appliances, while ensuring vulnerable households maintain safe and reliable heating. This approach not only promotes equity and customer well-being but also accelerates the adoption of high-efficiency equipment, delivering long-term energy savings and environmental benefits for all customers.

Q. How will National Fuel evaluate the effectiveness of the EE program?

A. National Fuel will implement a robust Evaluation, Measurement & Verification ("EM&V") plan to assess the performance and cost-effectiveness of the EE Program.

Key components of the EM&V process include:

- Independent Third-Party Evaluation: National Fuel will engage qualified, independent evaluators to conduct annual assessments of program performance, including verification of energy savings, customer participation, and cost-effectiveness.
- Savings Verification: Evaluators will use industry-standard methodologies, including deemed savings values and site-specific measurement where applicable, to quantify Mcf savings resulting from installed measures.
- Process Evaluation: In addition to savings verification, evaluators will assess program design, delivery, and customer satisfaction to identify opportunities for improvement and ensure the program remains responsive to customer needs.

- Reporting and Transparency: EM&V results will be documented in annual reports submitted to the PUC, providing transparency into program outcomes and supporting regulatory oversight.
- Continuous Improvement: Findings from EM&V activities will inform program adjustments, including incentive levels, outreach strategies, and measure eligibility, to enhance effectiveness and ensure alignment with evolving market conditions.

Q. How will National Fuel engage stakeholders and promote participation in the EE program?

A. National Fuel will implement a comprehensive stakeholder engagement and outreach strategy to ensure broad awareness, equitable access, and strong participation in the EE program across its residential customer segments.

Key elements of the strategy include:

- Customer Outreach and Education: National Fuel will use a mix of communication channels, including bill inserts, email campaigns, social media, and its website, to educate customers about available rebates, eligibility requirements, and the benefits of energy-efficient upgrades.
- Community Partnerships: The Company will collaborate with local community organizations, housing agencies, and nonprofit groups to reach underserved populations, including low-income households. These partnerships will help facilitate program enrollment and provide additional support services.
- Trade Ally Network: National Fuel will establish and maintain a network of

contractors, HVAC professionals, and equipment suppliers who are trained to promote and install qualifying high-efficiency equipment. Trade allies will be provided with program materials, technical support, and streamlined rebate processing tools.

- Stakeholder Engagement: The Company will engage with key stakeholders, including municipal leaders, advocacy groups, and regulatory staff, through regular briefings, public meetings, and feedback sessions to ensure the program remains transparent, inclusive, and responsive to community needs.
- Multilingual and Accessible Materials: Outreach materials will be made available in multiple languages and accessible formats to ensure all customers can understand and participate in the program.

Q. How does the Company plan to coordinate marketing efforts for the proposed EE program with the Low-Income Usage Reduction Program ("LIURP") and other customer assistance programs, ensuring that the EE program complements and enhances LIURP rather than duplicating efforts?

A. National Fuel believes that it is essential to coordinate its energy efficiency initiatives with programs designed to assist low- to moderate-income customers. The Company views the proposed EE Program as part of a comprehensive, "all-of-the-above" strategy to deliver meaningful benefits to customers. To that end, National Fuel would consider co-marketing the EE Program alongside other applicable programs to ensure eligible customers are aware of all available resources. Further, National Fuel recognizes the importance of a holistic

approach to energy efficiency – one that includes weatherization and equipment replacement. Accordingly, the Company would refer any EE Program participant who meets eligibility requirements to LIURP and other relevant assistance programs. This coordinated approach helps maximize customer benefits, reduce duplication of efforts, and address common barriers to participation, such as the upfront cost of high-efficiency appliances.

Q. How does the proposed EE program align with the Statements of Policy as outlined by the Commission in the alternative rate making Docket No. M-2015-2518883?

A. Each rate consideration identified in the Statement of Policy is listed below along with the relevant effect the proposed EE program has on each rate consideration:

1. *Please explain how the ratemaking mechanism and rate design align revenues with cost causation principles as to both fixed and variable costs.*

   The Company is proposing to recover the cost of the EE program from the customer class that directly benefits from the program.

2. *Please explain how the proposed EE program impacts the fixed utility's capacity utilization.*

   National Fuel's EE program is intended to reduce the average usage per account over the life of the program.

3. *Please explain whether the ratemaking mechanism and rate design reflect the level of demand associated with the customer's anticipated consumption levels.*

   The calculation of the Rider D rate will be based on total forecasted residential usage.

4. *Please explain how the EE Program limits or eliminates interclass and intraclass cost shifting.*

The EE program does not have interclass and intraclass cost shifting because the costs and benefits are confined to the respective residential customer class, based on participation.

5. *Please explain how the EE Program limits or eliminates disincentives for the promotion of energy efficiency.*

The proposed EE program actively promotes energy efficiency by providing incentives for customers to purchase and install equipment with higher AFUE ratings.

6. *Please explain how the EE Program impacts customer incentives to employ efficiency measures and distributed energy resources.*

Customers will have an incentive to employ energy efficiency measures and distributed energy resources because a reduction in volumetric usage reduces their overall bill.

7. *Please explain how the EE Program impacts low-income customers and support consumer assistance programs.*

Customers served under the Company's Customer Assistance Program ("CAP") Rate Schedule receive bill discounts based on a percentage of income. The Company also maintains a LIURP weatherization program for low-income customers. Measures are installed to reduce energy usage and customer bills. The EE program supports these programs by providing additional opportunities for

customers that do not meet the criteria for LIURP (200% FPL and more than 1,300 ccf of usage per year) to apply for rebates and thereby reduce their usage and overall bill.

8. *Please explain how the EE Program impacts customer rate stability principles.*

Customers that use the program will see more stable bills from lower usage and exposure to gas cost fluctuations.

9. *Please explain how weather impacts utility revenue under the EE Program.*

The proposed EE Pilot is intended to reduce the average volumetric usage per customer. It does reduce the amount of weather-related variation in both customer bills and associated utility distribution revenues. To the extent that weather is warmer or colder than normal, weather will impact the amount of revenue recovered through the proposed Rider D.

10. *Please explain how the EE Program impacts the frequency of rate case filings and affects regulatory lag.*

The EE program is not anticipated to (nor is intended to) impact the frequency of rate cases or have an impact on regulatory lag.

11. *Please explain if the EE Program interacts with revenue sources, such as Section 1307(f) automatic adjustment surcharges, 66 Pa.C.S. § 1307 (relating to sliding scale of rates; adjustments), riders such as 66 Pa.C.S. § 2804(9) (relating to standards for restructuring of electric industry) or system improvement charges, 66 Pa.C.S. § 1353 (relating to distribution system improvement charge).*

The Company's proposed EE program does not interact with revenue sources such as Section 1307(f) automatic adjustment surcharges, 66 Pa.C.S. § 1307 (relating to sliding scale of rates; adjustments), riders such as 66 Pa.C.S. § 2804(9) (relating to standards for restructuring of electric industry) or system improvement charges, 66 Pa.C.S. § 1353 (relating to distribution system improvement charge).

12. Please explain whether the EE Program includes appropriate consumer protections.

As noted in Rider D, a reconciliation will be completed at the end of the 5-year program.

13. Please explain whether the EE Program is understandable to customers.

The Company's proposed EE program will be supported by a comprehensive marketing and outreach strategy tailored to residential customers, ensuring clarity and accessibility of program offerings.

14. Please explain how the EE Program will support improvements in utility reliability.

The EE program will lead to more efficient usage, which will provide lower peak requirements, reducing risk on system delivery.

IV. RESEARCH, DEVELOPMENT & DEMONSTRATION (RD&D)

Q. Does the Company currently administer an RD&D Program?

A. Yes. National Fuel administers two RD&D programs, the Traditional Program and the Delta Funds Program.

Q. Please explain the RD&D Program goals and objectives.

A. The RD&D programs are designed to identify, evaluate, and advance emerging natural gas technologies that create measurable value for National Fuel and its customers. By funding external initiatives and collaborating with industry partners, manufacturers, and energy authorities, the programs accelerate the introduction of innovative solutions into National Fuel's service territory and promote customer adoption through real-world demonstration projects at committed sites.

Q. Please explain the program's benefits to National Fuel's ratepayer.

A. The programs provide the following benefits:

- Access to a broader range of energy-efficient, low-emission natural gas solutions.
- Enhanced competitiveness with alternative energy sources.
- Reduced operating costs and improved seasonal utilization of gas facilities.
- Increased safety and efficiency in gas delivery.
- Support for long-term system reliability and readiness for future energy needs.

Q. What types of initiatives are supported by the programs?

A. The program's efforts include evaluating underrepresented technologies in residential, commercial, and industrial markets, as well as operational projects that improve infrastructure reliability, productivity, and safety. Funding is also allocated for technology assessments, technology transfer, and administrative activities, ensuring a comprehensive approach to innovation and continuous improvement.

Q. Please describe the RD&D collaboratives funded.

A. The Delta Fund program funds the following collaborative efforts that align with the program's goals and objectives:

- Utilization Technology Development: GTI Energy's research and development of natural gas utilization, including appliances, industrial processes, distributed generation, and vehicles.
- Emerging Technology Program: An initiative by GTI Energy to move technologies from development to commercialization.
- Operations Technology Development: GTI Energy's development and implementation of new technologies for gas operations and infrastructure.
- Low-Carbon Resources Initiative: Collaboration with Electric Power Research Institute and GTI Energy to accelerate low-carbon energy technologies. GTI Energy also works collaboratively with and leverages funding from national and state research organizations, such as National Renewable Energy Laboratory, Department of Energy, California Energy Commission, New York State Energy Research and Development Authority, and others.

Refer to the National Fuel Exhibit EMS-2 – 2025 Delta Funds Report, for more details.

Q. How is the cost recovered for these RD&D programs?

A. The Traditional Program is currently recovering $143,603 as an O&M expense, funded through base rates. The Delta Funds Program is funded annually through base rates at an assumed amount, $526,500, using deferred accounting.

Q. Does the Delta Fund have an account balance?

A. Yes, the current Delta Fund account balance is $995,083.

Q. Is the Company proposing to change the RD&D Program funding?

A. Yes, National Fuel is proposing to slightly increase the Traditional Program's annual allowance from $143,603 to $176,220. National Fuel is proposing to lower the Delta Fund Program's annual allowance to from $526,500 to $300,000.

Q. Why is the Company proposing these changes to the RD&D Program funding?

A. National Fuel's Delta Fund balance of $995,083, combined with a reduced annual collection of $300,000, will provide sufficient support for major research collaborations. In addition, the Company has identified emerging opportunities aligned with program objectives, including gas heat pumps, hybrid heating systems, natural gas vehicles, combined heat and power, and renewable natural gas integration. The existing Delta Fund balance, together with the Traditional RD&D allocation, ensures adequate resources to pursue these initiatives. By strategically deploying these funds, National Fuel can expand demonstration projects, accelerate innovation, and deliver measurable benefits to ratepayers while maintaining fiscal responsibility.

Q. What are some examples of RD&D projects which National Fuel anticipates in the current year?

A. Although actual expenditures during the historical test year ("HTY") were lower than anticipated, this variance reflects the timing of the actual disbursement of funds for projects, not a lack of overall need or commitment. Several major RD&D initiatives were delayed due to the complexity of contractual negotiations with technology providers, project participants, and EM&V consultants. These agreements were finalized subsequent to the end of the HTY, and the associated work is now underway. Some project examples are:

1. Hybrid Dual Fuel Hydronic Boiler – a demonstration consisting of an electric air-to-water heat pump and a hydronic high efficiency boiler, offering energy efficiencies greater than 120%. The Company, in collaboration with GTI Energy, installed one system in its service territory, with full monitoring to test the capabilities and performance of this product, over two winter heating seasons. Emissions reductions are expected to be around 40 - 50% with yearly costs remaining the same or slightly higher than a traditional boiler without jeopardizing customer heating performance reliability.
2. Digital Tools and Robotics for Enhanced Envelope Retrofits – uses robotic arms and digital tools with computer vision to automate the execution of exterior wall weatherization measures on large buildings. The Company anticipates that this technology will streamline air sealing, cut installation costs, improve quality control, and solve challenges with traditional, labor-intensive methods.
3. Hybrid Heating System Software Tool and Calculator – provides users with a cost and emission comparison of various residential hybrid or dual-fuel heat pump system configurations. With user-friendly input, it provides clear annual heating

cost and greenhouse gas emissions estimates for each configuration.

4. Gas Heat Pump ("GHP") demonstration project – the Company will assess adding GHP systems to existing hydronic heating systems (and possibly combi systems) common in the Northeast, such as baseboard fin tube, radiant floor, and radiator configurations. This approach offers comparative insights across hydronic and forced-air systems.

V. COMPETITIVE ASSESSMENT

Q. Please provide an overview of the competitive environment in National Fuel's service territory.

A. National Fuel operates in a dynamic marketplace shaped by inter-fuel competition (oil, electricity, propane, biofuels), intra-fuel competition (other natural gas providers constructing bypass infrastructure), and customer-level competition (inter-company and intra-company). These factors influence operations, infrastructure planning, and customer demand, and are central to National Fuel's planning and rate-setting processes.

Q. Please explain how customer-level competition affects the Company's throughput.

A. Throughput is closely tied to the production levels of industrial and manufacturing customers, which fluctuate with competitive market dynamics. When competitors gain market share or production shifts outside the territory, the decline in natural gas consumption and throughput can harm the local economy and ratepayers. Conversely, successful customer operations can lead to job creation and economic growth that increases or preserves natural gas consumption,

benefiting both National Fuel's ratepayers and the region.

Q. How does National Fuel respond to customer-level competition?

A. To address these challenges, National Fuel's Energy Services team collaborates with economic development organizations to retain and attract businesses, providing technical support and promoting the advantages of natural gas. The Company works across internal departments, including Government Affairs and Corporate Communications, to coordinate with economic development officials and develop competitive support packages for at-risk customers considering relocation or expansion. Natural gas utility service is often a critical component of these efforts.

Q. What is the nature and extent of intra-fuel bypass competition?

A. A bypass threat exists where natural gas is delivered directly to end-users without utilizing National Fuel's distribution system. The primary bypass threat that National Fuel faces involve situations where end users elect to receive natural gas service directly from interstate pipelines. This threat is significant, especially among large-volume customers near Marcellus and Utica shale formations.

Q. How does National Fuel respond to intra-fuel bypass competition?

A. National Fuel actively monitors bypass threats from large natural gas users and evaluates each case based on contract status, pipeline feasibility, and alternative supply economics. The Company conducts detailed analyses of factors such as customer location, pipeline

length and size, annual volume, margin, load factor, and facilities cost to determine the economics of bypass options. When a threat is legitimate, National Fuel quantifies the cost of the alternative and may offer negotiated discounts or flexible contract terms under its tariff to retain customers and preserve system throughput. These adjustments reflect competitive realities while ensuring fairness to all ratepayers. The Company also educates customers on service differences, emphasizing reliability and balancing provisions that impact pricing. HIGHLY CONFIDENTIAL National Fuel Exhibits EMS-3 and EMS-4 will provide a list of those customers with existing bypass facilities as well as several customers that are at risk of bypass.

Q. How many customers are currently on a negotiated rate due to risk of bypass?

A. There are currently 10 customers on a negotiated rate. Refer to HIGHLY CONFIDENTIAL National Fuel Exhibit EMS-5 – List of Bypass Contracts.

Q. What are the impacts of these negotiated rate customers on overall throughput and revenues?

A. The annual throughput for these 10 customers is 7.8 Bcf. The annual revenue is $2.4 million.

Q. How does offering a negotiated rate benefit National Fuel's customers?

A. Bypass reduces throughput on National Fuel's system, which can lead to higher per-unit costs for remaining customers as fixed costs are spread over a smaller base. The loss of

large-volume customers also impacts system planning, investment recovery, and long-term rate stability. National Fuel's proactive approach to monitoring, analyzing, and responding to bypass threats is essential to maintaining system integrity and protecting the interests of all ratepayers.

Q. Does this conclude your direct testimony at this time?

A. Yes, it does.

NATIONAL FUEL EXHIBIT EMS-1

National Fuel Exhibit EMS-1 - Proposed Energy Efficiency Program

National Fuel Gas Distribution Corp.
Pennsylvania Division

Energy Efficiency (EE) Program

Proposed Rebates, Estimated Customer Participation Levels and Estimated NFG Program Costs

Total # of PA Residential Customers:			196,642															
Est. # w/ Gas Space Heating:		87%	171,275										Est. Gas Cost =	$ 8.84				
Est. # w/ Gas Water Heating:		73%	125,716															
									PA Estimated									
		Customers w/ Equip. Type		Est. Customers w/ Effic. Level				Annual	Est. Annual Upgrades			Est. Annual Savings		Est. Equipment Installed Costs				
End Use	Equipment Type	%	# of Customers	Efficiency	Description	%	# of Customers	Gas Usage (Mcf)	Upgrade to	%	# of Customers	Mcf	$	Current	New	Incremental		
Space Heating	Hot Air Furnace	80%	137,020	Low (80% AFUE)	Standard w/ Electronic Ignition	53%	72,621	67.1	High (95%+)	0.5%	363	15.4	$ 136.14	$ 3,690	$ 4,150	$ 460		
				Med (90%+ AFUE)	Condensing Furnace	47%	64,399	67.1	High (95%+)	0.5%	322	5.2	$ 45.88	$ 4,130	$ 4,320	$ 190		
	Hot Water Boiler	20%	34,255	Low (>84% AFUE)	Federal Standard	80%	27,404	108	High (90%+)	0.5%	137	10.0	$ 88.13	$ 5,940	$ 6,700	$ 760		
Water Heating	Storage Tank Heater	92%	115,659	Current Standard (.61 UEF)	Standard, Pilot Ignition, Basic Insulation	80%	92,527	20.4	Med (.66 UEF)	0.5%	463	1.2	$ 10.73	$ 740	$ 800	$ 60		
								17.8	High (.84 UEF)	0.5%	463	4.4	$ 38.79	$ 740	$ 1,140	$ 400		
Clothes Dryer		91%	114,402			37%	50,697	3.6	Energy Star	0.5%	253	0.1	$ 1.06	$ 710	$ 870	$ 160		

National Fuel Exhibit EMS-1 - Proposed Energy Efficiency Program

National Fuel Gas Distribution Corp.
Pennsylvania Division

Energy Efficiency (EE) Program

Proposed Rebates, Estimated Customer Participation Levels and Estimated NFG Program Costs

Total # of PA Residential Customers:		196,642	
Est. # w/ Gas Space Heating:	87%	171,275	
Est. # w/ Gas Water Heating:	73%	125,716	

		Customers w/ Equip. Type		Proposed	Customer Payback on Incremental Cost		Estimated NFG Program Results			
End Use	Equipment Type	%	# of Customers	NFG Rebate	w/out NFG Rebate	w/ NFG Rebate	# of Participants	Total Mcf Savings	Total $ Savings	Total Rebate Costs
Space Heating	Hot Air Furnace	80%	137,020	$ 400	3.4	0.4	363	5,592	$ 49,431	$ 145,241
				$ 150	4.1	0.9	322	1,671	$ 14,773	$ 48,300
	Hot Water Boiler	20%	34,255	$ 700	8.6	0.7	137	1,366	$ 12,076	$ 95,914
Water Heating	Storage Tank Heater	92%	115,659	$ 50	5.6	0.9	463	562	$ 4,965	$ 23,132
				$ 300	10.3	2.6	463	2,030	$ 17,946	$ 138,790
Clothes Dryer		91%	114,402	$ 100	150.8	56.6	253	30	$ 269	$ 25,349
							2,001	**11,251**	**$ 99,460**	**$ 476,726**

NATIONAL FUEL EXHIBIT EMS-2

National Fuel®

December 23, 2025

VIA ELECTRONIC FILING

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, Pennsylvania 17120

Re: National Fuel Gas Distribution Corporation
Delta Fund for Research and Development Projects Report

Dear Secretary Homsher;

Pursuant to R-00061493 Settlement paragraph 18 A.3, "Distribution will file with the Commission and serve upon other Parties on or before December 31 an annual report for the preceding twelve-month period ended September 30, setting forth revenues for the Delta Fund for research and development projects and expenditures for such projects. In addition, Distribution will describe in the annual report projects that have been funded". The enclosed report is submitted under this settlement agreement.

Very truly yours,

Erik M. Solomon
Senior Director
Energy Services Department

Encl.

Cc: Office of Special Assistants (E-Mail)
Office of Consumer Advocate (E-Mail)
Office of Small Business Advocate (E-Mail)

I. INTRODUCTION/BACKGROUND

The provisions of R-00061493 Settlement paragraph 18 A.3 were adopted on November 30, 2006, and effective January 1, 2007. Paragraph 18 A.3 states:

"3. The Joint Petitioners agree to $526,466 to fund the Delta research and development program pursuant to the Statement of Scott E. Swartzfager No. 14. The deferral treatment and review process outlined in R-00049656 will continue. The company will not expend these dollars on additional customer outreach for enhanced energy efficiency.

Distribution will be permitted to record a regulatory asset or liability for differences between the annual rate allowance and annual expenditures. However, Distribution will not be permitted to retroactively recover in a future proceeding any expenditures in excess of the annual rate allowance and any deferred balance from the previous year's Delta funding. Distribution will provide for review of research projects as described in its testimony. In order to implement this Settlement, the Joint Petitioners request that the Commission's Final Order in this proceeding include the following language to allow Distribution to qualify for deferred accounting under SFAS 71:

> "National Fuel Gas Distribution Corporation's accounting policies conform to the Statement of Financial Accounting Standards No. 71 'Accounting for the Effect of Certain Type of Regulations' which are in accordance with the accounting requirements and ratemaking practices of regulatory authorities. The application of these accounting policies allows the Company to defer expenses and income on the balance sheet as regulatory assets and liabilities when it is probable that those expenses and income will be allowed in the rate-setting process in a period different from the period in which they would have been reflected in the income statement by an unregulated Company.
>
> "Because research and development projects often require a commitment over multiple years and because the expenditures for such projects may not match on an annual basis revenue for funding of research and development projects, deferred accounting is appropriate and is approved. The regulatory deferral treatment sought for the Research and Development expenditures and rate relief requested in the case are in accordance with SFAS No. 71.
>
> "The Company will manage the costs of the Research and Development expenditures to match revenues deferred pursuant to this Order to eliminate any differences between deferred costs and deferred revenues at the end of a five-year period commencing on the day after the R-00049656 Order was entered."

Distribution will file with the Commission and serve upon other Parties on or before December 31 an annual report for the preceding twelve-month period ended September 30, setting

forth revenues for the Delta Fund for research and development projects and expenditures for such projects. In addition, Distribution will describe in the annual report projects that have been funded."

The provisions of R-00049656 Settlement paragraph 44 were adopted on March 23, 2005, and effective April 15, 2005. Paragraph 44 states:

"44. Distribution's proposal to fund the Delta research and development program pursuant to the Supplemental Statement of Ruth Friedrich-Alf No. 102 S2 is approved. Increased rates in this proceeding provide for recovery of $526,466 in Delta research funds. Distribution will be permitted to record a regulatory asset or liability for differences between the annual rate allowance and annual expenditures. However, Distribution will not be permitted to retroactively recover in a future proceeding any expenditures in excess of the annual rate allowance and any deferred balance from the previous year's Delta funding. Distribution will provide for review of research projects as described in its testimony. In order to implement this agreement, the Parties request that the Commission's Final Order in this proceeding include the following language to allow Distribution to qualify for deferred accounting under SFAS 71:

> 'National Fuel Gas Distribution Corporation's accounting policies conform to the Statement of Financial Accounting Standards No. 71 'Accounting for the Effect of Certain Type of Regulations' which are in accordance with the accounting requirements and ratemaking practices of regulatory authorities. The application of these accounting policies allows the Company to defer expenses and income on the balance sheet as regulatory assets and liabilities when it is probable that those expenses and income will be allowed in the rate-setting process in a period different from the period in which they would have been reflected in the income statement by an unregulated Company.
>
> 'Because research and development projects often require a commitment over multiple years and because the expenditures for such projects may not match on an annual basis revenue for funding of research and development projects, deferred accounting is appropriate and is approved. The regulatory deferral treatment sought for the Research and Development expenditures and rate relief requested in the case are in accordance with SFAS No. 71.
>
> 'The Company will manage the costs of the Research and Development expenditures to match revenues deferred pursuant to this Order to eliminate any differences between deferred costs and deferred revenues at the end of a five-year period commencing on the day after this Order is entered.'

Distribution will file with the Commission and serve upon other Parties on or before December 31 an annual report for the preceding twelve-month period ended September 30, setting forth

revenues for the Delta Fund for research and development projects and expenditures for such projects. In addition, Distribution will describe in the annual report projects that have been funded."

As presented in R-00049656 Statement No. 102 (page 15).

"On an annual basis coming off of September 30, a reconciliation of revenues and expenditures with a description of projects funded will be on file on or before December 31 with the Office of Trial Staff, Office of Consumer Advocate and the office of Small Business Advocate. At the fifth reconciliation, Distribution will file a five-year report."

As presented in R-00049656 Statement No. 102 S2 (page 7)

"Annual revenues …. will be deferred to offset the costs of the Research and Development expenditures (expenses) to both the Gas Technology Institute ("GTI") fund and local projects.

The Company will manage the cost of the Research and Development expenditures to match revenues deferred pursuant to this Order to eliminate any differences between deferred costs and deferred revenues at the end of a five-year period commencing on the day after this Order is entered."

It is under these guidelines and agreements that Distribution files the following report for the period ended September 30, 2025.

National Fuel Gas Distribution Corporation
Pennsylvania Division

II. Annual Filing of Delta Fund Revenues and Expenditures
For the period ended September 30, 2025

	Annual		Cumulative		
Year Ended	Expenditures	Revenues	Expenditures	Revenues	Balance
Sept. 2005	$92,300	$113,927	$92,300	$113,927	($21,627)
Sept. 2006	$376,800	$526,466	$469,100	$640,393	($171,293)
Sept. 2007	$596,800	$526,466	$1,065,900	$1,166,859	($100,959)
Sept. 2008	$526,493	$526,466	$1,592,393	$1,693,325	($100,932)
Sept. 2009	$376,368	$526,466	$1,968,761	$2,219,791	($251,030)
Sept. 2010	$455,911	$526,466	$2,424,672	$2,746,257	($321,585)
Sept. 2011	$721,800	$526,466	$3,146,472	$3,272,723	($126,251)
Sept. 2012	$280,300	$526,466	$3,426,772	$3,799,189	($372,417)
Sept. 2013	$626,800	$526,466	$4,053,572	$4,325,655	($272,083)
Sept. 2014	$278,891	$526,466	$4,332,463	$4,852,121	($519,658)
Sept. 2015	$276,800	$526,466	$4,609,263	$5,378,587	($769,325)
Sept. 2016	$458,404	$526,466	$5,067,667	$5,905,053	($837,386)
Sept. 2017	$500,530	$526,466	$5,568,197	$6,431,519	($863,322)
Sept. 2018	$362,547	$526,466	$5,930,744	$6,957,985	($1,027,241)
Sept. 2019	$445,438	$526,466	$6,376,182	$7,484,451	($1,108,269)
Sept. 2020	$452,883	$526,466	$6,829,065	$8,010,917	($1,181,852)
Sept. 2021	$468,422	$526,466	$7,297,487	$8,537,383	($1,239,896)
Sept. 2022	$865,588	$526,466	$8,163,075	$9,063,849	($900,774)
Sept. 2023	$517,264	$526,466	$8,680,339	$9,590,315	($909,976)
Sept. 2024	$587,533	$526,466	$9,267,872	$10,116,781	($848,909)
Sept. 2025	$380,292	$526,466	$9,648,164	$10,643,247	($995,083)

Note 1: Rates were effective April 15, 2005, therefore the report ended September 30, 2005, does not represent a 12 month period of revenue collection.

III. DESCRIPTION OF ACTUAL EXPENDITURES - PERIOD ENDED SEPTEMBER 2025

A. GTI Utilization Technology Development Program

$129,500 was submitted to Utilization Technology Development, NFP (UTD) for the April 1, 2025, through March 31, 2026, dues. $125,817.02 has been allocated to specific projects as listed below.

UTD Payments, Fees, Credits, Carryover	
Payments to UTD	129,500.00
Administration Fees	-12,950.00
Carryover of Unallocated Funds from Prior Year	3,220.30
Funds Available for Allocation	119,770.30
Large Commercial and Industrial Customers	

2.21.A.2 High Hydrogen Burner for Commercial and Industrial Applications - Phase 2	-3,700.00
2.22.D.2 High Performance Adjustable Port Burner - Phase 2	-3,330.00
2.22.E.2 Mitigating Methane Emissions from Large Comm. and Industrial End Use Eqpt. - Phase 2	-2,775.00
2.22.F.2 Tecogen Hybrid Gas/Electric Chiller Laboratory Evaluation - Phase 2: Field Validation	-1,850.00
2.23.A Decarbonizing Large Comm. and Industrial Eqpt. with Hydrogen	-2,682.50
2.23.A.2 Decarbonizing Large Comm. and Industrial Eqpt. with Hydrogen - Phase 2: Boiler Focus	-3,700.00
2.23.B Mobile Modular Resilient Gas-fired Power Generation	-555.00
2.24.C Lumiflex H2 High Efficiency, Fuel-Flexible, Ultra-Low NOx Regenerative Burner	-3,330.00
2.24.D Noble Thermodynamics Zero Emission CHP System	-1,665.00
2.24.E Fuel-flexible, Ultra-low NOx, Cross-cutting Omnivore Combustion System	-666.00
2.24.H Hydrogen-blending at Asphalt Plants - Field Tests	-2,960.00
2.24.I Carbon Capture Technologies for Large Commercial and Industrial Systems	-1,872.94
2.25.A Mainspring Clean, Fast, Dispatchable Onsite Power Generation with Heat Recovery	-2,590.00
2.25.B High Efficiency, High Temperature Industrial Energy Recovery Heat Exchanger	-2,960.00
2.25.C Modular FlexCHP with Integrated Absorption Chiller	-629.00
2.25.D Direct Carbon Conversion to Syngas through Bi-Reforming	-2,960.00
Food Preparation and Service Customers	
1.17.H.6 Residential Cooking Pollutants and IAQ - Phase 6	-2,590.00
1.17.H.7 Residential Cooking Pollutants and IAQ - Phase 7	-1,480.00
1.19.A.3 High Efficiency Smart Convection Oven - Phase 3	-740.00
1.20.K.2 Field Evaluation of Indoor Air Quality in Residential Kitchens - Phase 2	-955.71
1.20.K.3 Field Evaluation of IAQ in Residential Kitchens – Phase 3: Demand-Controlled Hood	-1,110.00
1.21.G.5 Technical Support to Address Gas Foodservice Technologies - Phase 5	-2,590.00
1.23.N.3 Next Generation Commercial and Residential Range Top Burner - Phase 3	-222.00
1.24.M Mitigating Methane Emissions from Kitchen Ranges and Rangetops	-1,480.00
1.25.M CFS Technology to Enhance Energy Efficiency, Carbon Reduction and Cooking Performance	-370.00
1.25.N Ventless System for Gas-Fired CFS Appliances	-1,480.00
Residential and Light Commercial Customers	
1.16.H.6 EnergyPlus Models for Advanced Fuel-Fired and Hybrid Systems - Phase 6: Hybrid Systems	-2,960.00
1.17.B.4 Thermoelectric Generator for Self-Powered Water Heater - Phase 4	-632.33
1.17.F.3 Thermolift Combined Heating/Cooling System Technical Support - Phase 3: Load-Based Testing	-3,700.00
1.18.C.3 Advanced Nozzle Burner for Commercial Water Heaters - Phase 3: Beta Prototype Refinement	-1,887.00
1.18.F.4 Mitigating Methane Emissions from ResCom End Use Equipment – Phase 4: H2 Impacts	-666.00
1.18.F.5 Mitigating Methane Emissions from ResCom End Use Equipment - Phase 5: Whole Building Analysis	-3,330.00
1.19.C.3 Integrated, Self-Powered, High-Efficiency Burner System - Phase 3	-1,850.00
1.20.I.2 Membrane-Based Ionic Liquid Absorption Heat Pump for Commercial HVAC - Phase 2: Field Demo	-2,220.00
1.21.B.5 Technical Support for ResCom Gas Equipment Testing, Perf, and Safety - Phase 5	-3,700.00
1.21.C.2 CleanO2 CarbinX Carbon Capture - Phase 2	-2,220.00

1.22.G.2 Safe Use of Hydrogen in Buildings - Phase 2	-2,163.02
1.22.H.2 Hybrid Fuel-Fired and Elec-Driven Rescom HVAC Systems – Phase 2: Prototype Furnace+EHP	-2,960.00
1.22.P.3 Emerging Distributed Methane Pyrolysis Technologies - Phase 3	-2,960.00
1.23.B Blue Frontier RTU AC system with Integrated mCHP - Laboratory Evaluation	-888.00
1.24.A High-Efficiency Thermally-driven Liquid-Liquid Separation Cooling Systems	-1,258.00
1.24.B Non-Intrusive Building Envelope Air Infiltration Detection Tools	-2,037.59
1.24.C Maximizing Efficiency of Gas Absorption Heat Pumps coupled with Commercial Boilers	-2,354.68
1.24.E Tour Engine ENABLE Microgrid mCHP System	-1,110.00
1.24.I Modern Interchangeability Indices for Hydrogen-Enriched Natural Gas	-2,263.66
1.24.N Cooll Adsorption Gas Heat Pump	-1,071.15
1.24.Q CarbonQuest End-Use Carbon Capture	-1,681.65
1.24.R Impact of Trace Constituents in Renewable Natural Gas on Appliances	-986.79
1.25.A Advanced Attic Insulation Retrofit Tools Using Robotics and AI-Enhanced Diagnostics	-3,330.00
1.25.B EC Power's PowerHeatPump System – Laboratory Evaluation	-2,960.00
1.25.C Sandbox Carbon End-Use Carbon Capture Dumpster	-1,850.00
1.25.D Emerging Smart Controllers and Battery Backup for Gas and Hybrid Heating Systems	-7,622.00
1.25.E Hybrid Electric Monobloc ATW Heat Pumps with Gas Backup for Affordability and High Efficiency	-1,184.00
1.25.G Weil McLain ECO Hybrid Dual Fuel Electric Heat Pump and Gas Boiler Hydronic System	-2,590.00
1.25.H Integrating Gas Absorption and Electric Heat Pumps to Efficiently Provide High Supply Temps	-1,887.00
1.25.I Vacuum Insulated Panel Building Envelope Advancements to Reduce Energy Demand	-2,035.00
1.25.L Yanmar Gas Engine Heat Pump VRF Commercial RTU	-1,443.00
Clean Transportation and Advanced Energy System Customers	
2.20.G.3 Smart CNG Station Field Demonstration - Phase 3	-370.00
2.21.G.3 Distributed RNG/Biogas Production and Cleanup – Phase 3	-1,850.00
2.21.I.5 Technical Support for Clean Transportation Testing, Performance, and Safety - Phase 5	-1,850.00
Memberships/Other	
1.23.P.3 UTD Program Technology Transfer Communication - Phase 3	-703.00
Adjustments and Miscellaneous Refunds	
Refund - 1.21.E Gas Engine Heat Pump Modeling, Testing and Implementation	714.47
Refund - 1.23.F Integrating Hybrid Fuel-fired and Elec-driven ResCom HVAC with PV in Generac Nanogrid	40.70
Board Designated Net Assets 2025	8,852.27
Funds Allocated to Projects	-125,817.02
Unallocated Funds	3,560.72

B. GTI Operations Technology Development Program

$184,500 was submitted to Operations Technology Development, NFP (OTD) for the 2025 membership fee. $205,493.19 has been allocated to specific projects as listed below.

Payments to OTD, Fees, Carryover	
Payments to OTD	184,500.00
Administration Fees	-13,837.50
Carryover of Unallocated Funds from Prior Year	45,235.97
Funds Available for Allocation	215,898.47
Allocations to Projects	
(1), (2) and (4) Historic Projects	
2.10.b.2 Refund In-Service Field Evaluation of Polyurea Coating Systems – Phase 2	308.97
(5) Construction/ Infrastructure Techniques	
5.16.d.3 REMS Phase 3: Development of Field-Ready Prototype	-5,511.02
5.17.g.3 Material-Supplier Quality Assurance Program Phase 3	-7,380.00
5.19.a PE Squeeze Tool Gap Stop Validation	-88.93
5.19.f.2 Purging Gas Pipes into Service without Venting Gas to Atmosphere - PHASE 2 of OTD 5.19.f	-738.00
5.20.a Refund Subsurface Multi-Utility Asset Location Detection	1,176.39
5.20.k.2 Refund LPWAN Network Roadmap	10.50
5.20.m.3 Product Performance and Validation Program Phase 3	-7,380.00
5.21.e Evaluation of the CoSMiC Eye Satellite Based Pipeline Right-of-Way Monitoring System	-135.05
5.21.e.2 Development and Evaluation of the CoSMiC Eye Satellite Based Pipeline Monitoring System Phase 2 -Pipeline Right-of-Way Monitoring for Class Location Designation	-838.37
5.21.j Hydrogen Blending Impact on Aldyl-A nad HDPE Pipes	-1,018.81
5.22.i Gas Engineer Training Program Development	-1,945.74
5.22.j.4 Testing of New Pietro Fiorentini Gas Service Regulators	-144.65
5.22.t Market Study of 100% H2 Compatible Distribution Equipment	-83.39
5.23.j Material Inspection and Testing Training Program	-1,401.09
5.23.n.2 Developing Acceptance Criteria for Mechanical Tapping Tee Anomalies – Phase 2	-32,281.97
5.24.f Product Standards for Plastic Tapping Tees	-1,800.72
5.24.h Hydrogen Blending Pilot Gas Quality Evaluation and System Modeling	-1,135.41
5.24.w Community Geothermal Systems Opportunities for LDCs to Consider	-6,663.03
5.24.z SUSTAIN H2 Storage	-18,450.00
5.25.i Evaluation of Overpipe	-3,690.00
5.25.m Inside Methane Detectors Pilots in Operations	-5,535.00
(6) Memberships/Other	

6.14.a Quality Audit Program	-7,380.00
6.25.a Enhanced Communications Initiative to Support Technology Transfer	-1,845.00
(7) Methane Emissions/Detection and Gas Quality	
7.16.e.3 Biomethane On-LIne Monitoring Phase III	-603.32
7.22.h Veritas Gas Measurement and Verification Initiative	-18,450.00
7.22.l 2025-2026 Open Hydrogen Initiative 2025-2026	-18,450.00
7.23.g Investigate Feasibility of Pipeline Thermographic Internal Inspection for Leak Detection	-64.21
7.23.i Net-Zero Infrastructure Program	-18,450.00
7.23.n Satellite Methane Detection for Distribution Applications	-407.38
7.23.q Workshops on Decarbonization Pathways that leverage the Natural Gas Infrastructure for non-utility stakeholders	-146.12
7.24.k Comparison of a Correlative Calorimeter to Online GCs	-6,257.13
7.24.o Met Collaborative Program	-9,225.00
7.24.r Impact of Trace Constituents in Renewable Natural Gas on Appliances	-2,460.12
(8) Intelligent Utilities	
8.20.m Refund 3D Visualization Software for Mapping Underground Pipelines and Improving Pipeline Asset Management	2,316.60
8.22.c.2 Automation of Digital MTR Processing Pilots	-6,105.84
8.24.k Evaluation of One Call Damage Prevention Software	-3,346.46
8.25.m Meta NZ 2.0 Characterizing the Enduring Role of Gas Across Leading U.S Economy Wide Decarbonization Studies	-7,380.00
8.25.o Predictive Model for Cross Bore Risk	-3,690.00
(9) Risk and Decision Analysis/Model	
9.24.a Natural Gas Ban Effects on Local Gas Distribution Companies	-8,823.90
Adjustments and Miscellaneous Refunds	
Board Designated Net Assets 2025	17,089.80
G&A Refund	0
Funds Allocated to Projects	-205,493.19
Unallocated Funds	27,495.08

C. SUMMARY OF ACTUAL EXPENDITURES PERIOD ENDED 2025

Utilization Technology Development (UTD) Program - GTI	$ 129,500
Operations Technology Development Program (OTD) - GTI	$ 184,500
Emerging Technology Program (ETP) - GTI	$ 11,100
North American Gas Heat Pump Collaborative – RI LLC	$ 9,250
Hybrid Heating and Cold Climate Heat Pump- Demos	$ 27,442
Dynamic Risk	$ 18,500
Total Pennsylvania Delta Funds Program Expenditures	**$ 380,292**

IV. PROJECTED EXPENDITURES - PERIOD ENDING SEPTEMBER 2026

Expenditures for National Fuel Gas Distribution Corporation's ("National Fuel") Pennsylvania Delta Funds RD&D Program are projected to be between $450,000 and $970,000 of which $526,466 is collected on an annual basis. The balance will be covered by unutilized funds from prior years. In 2025 the following planned charges are projected:

1. **Utilization Technology Development** (UTD) membership fees of approximately $129,500. Specific projects to be determined.

2. **Operations Technology Development** (OTD) membership fees of approximately $184,500. Specific projects to be determined.

3. **Emerging Technology Program** (ETP) membership fees of approximately $11,100.

4. **Local Opportunity Projects** spending estimate of approximately $350,000 (see below). Funds not used for the development of qualified local technology projects in National Fuel territory may be allocated to the national GTI programs described above.

    1) $250,000 – Gas Heat Pump Demonstration
    2) $75,000 - Ingevity School Bus Program
    3) $25,000 – Hybrid Tool - GTI ETP

SUMMARY OF PROJECTED EXPENDITURES - PERIOD ENDED 2026

Utilization Technology Development Program - GTI	$ 129,500	Planned
Operations Technology Development Program - GTI	$ 184,500	Planned
Emerging Technology Program – GTI	$ 11,100	Planned
Gas Heat Pump Demonstration	$ 250,000	Planned
Ingevity School Bus Program	$ 75,000	Potential
Hybrid Tool – GTI ETP	$ 25,000	Paid
Total Pennsylvania Delta Funds Program Expenditures	**$ 575,100**	**Planned**
Total Pennsylvania Delta Funds Program Expenditures	**$ 100,000**	**Potential/Paid**
Total Pennsylvania Delta Funds Program Expenditures	**$ 675,100**	**Planned, Potential/Paid**

V. STATUS UPDATE OF LOCAL OPPORTUNITY PROJECTS – 2025

Funding of gas industry research through GTI, as an example, returns many benefits, including ensuring continued improvement and availability of energy-efficient, low emissions and cost-effective gas technologies, while leveraging the funding resources of gas utilities across North America. The Local Opportunity Projects portion of this program intends to identify projects for direct local support offering equal, or better, benefits than GTI. This is challenging, but National Fuel endeavors to identify and develop these opportunities. Funds available through this portion of the program, beyond the minimum commitments to GTI, may be used for qualified local projects. Funds not used locally are sent to GTI to be allocated to suitable projects, as shown in the previous supported project listings.

Summaries for Local Opportunity Projects active or completed in 2025 are provided below.

1. **Hybrid Heating and Cold Climate Air Source Heat Pump Demonstrations**
   National Fuel successfully completed two demonstration projects in its Pennsylvania service territory.

   - **Hybrid Heating Demonstrations:** Twelve (12) hybrid systems were installed to evaluate operating costs and the impact on greenhouse gas (GHG) emissions associated with using an electric Air Source Heat Pump (ASHP) in combination with a high-efficiency natural gas furnace for heating and cooling, compared to a traditional gas furnace and central electric air conditioning.
   - **Cold Climate Air Source Heat Pump Demonstrations:** Two (2) cold climate air source heat pumps (ccASHP) were installed to study monthly energy cost and usage changes, cold climate equipment performance, and GHG emissions when utilizing a ccASHP as the sole energy source for heating and cooling.

   Both projects have been completed, and a comprehensive final report summarizing findings, performance data, and key insights on energy efficiency and emissions reduction has been prepared.

2. **Venancio Genesis Stove Study**

   National Fuel undertook a year-long study from 2024 to 2025 to assess the energy usage of the Venancio Genesis stove. This stove, produced by a Brazilian manufacturer, was marketed with claims of delivering a 33% reduction in energy consumption compared to other commercial stoves. The project's objective was to test these claims in real-world restaurant environments, with the broader goal of determining whether such technology could enhance profit margins and promote energy efficiency for commercial kitchens using natural gas. The study concluded that the Venancio Genesis stove did not deliver significant energy savings or operational advantages in actual restaurant settings.

3. **NGV Technology Demonstration.** National Fuel implemented a demonstration project involving four (4) Ford F-250 pickup trucks modified with Adsorbed Natural Gas (ANG) technology. ANG enables low-pressure fueling (900 psi vs. traditional 3,600 psi), allowing for convenient, private daily refueling using compact, low-cost devices installed at locations with natural gas access. This approach eliminates the need for expensive, high-pressure fast-fill stations. Funding for the vehicle modifications and fueling devices was shared between National Fuel and the Alternative Fuels Incentive Grant (AFIG), with fueling devices installed at Oil City, Sharon, and Erie Service Centers. The trucks are distributed as follows: one in Oil City, one in Sharon, and two in Erie. AFIG and Delta funds supported two trucks and fueling devices, while National Fuel's Operations group purchased the remaining two trucks.

Project Results:
Performance data from Q3 2022 through Q4 2024 demonstrates the environmental and economic benefits of ANG technology across Oil City and Erie:

- **Renewable Natural Gas (RNG) Usage:**
  - Oil City: 1,656 GGE (Q3 2022) to 141 GGE (Q4 2024)
  - Erie: 1,506 GGE (Q3 2022) to 170 GGE (Q4 2024)
  - Cumulative (All Vehicles): 3,162 GGE by Q4 2024
- **CO_2 Reduction:**
  - Oil City: 15.17 metric tons (Q3 2022) to 1.31 metric tons (Q4 2024)
  - Erie: 13.92 metric tons (Q3 2022) to 1.59 metric tons (Q4 2024)
  - Cumulative: 29.1 metric tons by Q4 2024
- **Fuel Cost Savings:**
  - Oil City: $3,870 (Q3 2022) to $292 (Q4 2024)
  - Erie: $3,428 (Q3 2022) to $358 (Q4 2024)
  - Cumulative: $7,298 by Q4 2024
- **Environmental Impact (Trees Planted Equivalent):**
  - Oil City: 252 (Q3 2022) to 22 (Q4 2024)
  - Erie: 231 (Q3 2022) to 26 (Q4 2024)
  - Cumulative: 483 trees by Q4 2024

Conclusion:
The NGV Technology Demonstration successfully showcased the operational feasibility and benefits of ANG-equipped vehicles. The project resulted in measurable reductions in greenhouse gas emissions, significant fuel cost savings, and a positive environmental impact equivalent to planting hundreds of trees. These results support the continued adoption of ANG technology for fleet vehicles and highlight its potential for broader implementation.

VI. PROSPECTIVE LOCAL OPPORTUNITY PROJECTS – 2026

1. **Hybrid Dual Fuel Hydronic Boiler** - a demonstration consisting of an electric air-to-water heat pump and a hydronic high efficiency boiler, offering energy efficiencies greater than 120%. The Company, in collaboration with GTI Energy, installed one system in our Pennsylvania service territory, with full monitoring to test the capabilities and performance of this product, over two winter heating seasons. Emissions reductions are expected to be around 40 - 50% with yearly costs remaining the same or slightly higher than a traditional boiler without jeopardizing customer heating performance reliability.

2. **Digital Tools and Robotics for Enhanced Envelope Retrofits** – uses robotic arms and digital tools with computer vision to automate the execution of exterior wall weatherization measures on large buildings. It anticipates that this technology will streamline air sealing, cut installation costs, improve quality control, and solve challenges with traditional, labor-intensive methods.

3. **Hybrid Heating System Software Tool and Calculator** – Provides users with a cost and emission comparison of various residential hybrid or dual-fuel heat pump system configurations. With user-friendly input, it provides clear annual heating cost and greenhouse gas emissions estimates for each configuration.

4. **Gas Heat Pump ("GHP") demonstration project** - will assess adding GHP systems to existing hydronic heating systems (and possibly combi systems) common in the Northeast, such as baseboard fin tube, radiant floor, and radiator configurations. This approach offers comparative insights across hydronic and forced-air systems.

Although actual expenditures in 2025 were lower than projected, this discrepancy is attributable to the timing of fund disbursement for various projects rather than a reduced need or commitment. Several significant research, development, and demonstration (RD&D) initiatives experienced delays due to the complexity of contractual negotiations involving technology providers, project participants, and EM&V consultants. These agreements were finalized after the conclusion of the fiscal year, and the corresponding work is now in progress. National Fuel remains committed to identifying and developing additional beneficial Local Opportunity Projects that may deliver direct value to Pennsylvania consumers, businesses, and industries.

NATIONAL FUEL EXHIBIT EMS-3

CONFIDENTIAL

NO PUBLIC VERSION

NATIONAL FUEL EXHIBIT EMS-4

CONFIDENTIAL

NO PUBLIC VERSION

NATIONAL FUEL EXHIBIT EMS-5

CONFIDENTIAL

NO PUBLIC VERSION

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 18-R

Rebuttal Testimony of Erik M. Solomon

Topics Addressed: **Energy Efficiency Pilot**

Dated: May 12, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Erik M. Solomon. My business address is 6363 Main Street, Williamsville, NY 14221.

Q. Did you previously submit testimony in this proceeding on behalf of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company")?

A. Yes. I submitted my direct testimony, National Fuel Statement No. 18, on January 28, 2026.

II. PURPOSE OF TESTIMONY

Q What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to address the allegations and recommendations advanced by intervenors related to the Company's proposed Energy Efficiency ("EE") Pilot Program ("EE Pilot"), identify points of agreement and matters not in dispute, and demonstrate that no intervenor has presented evidence supporting denial or material modification of the Company's proposal. This testimony explains why the intervenors' concerns do not warrant changes to the proposal as filed.

III. EE PILOT

Q. Do the intervenors understand the Company's proposed EE Pilot?

A. Yes. Each intervenor demonstrates a clear and accurate understanding of the Company's proposed EE Pilot. No party disputes that the program is a voluntary, residential-only, five-

year pilot beginning in October 2026, offering rebates for high-efficiency natural gas space heating, water heating, and clothes drying equipment. No intervenor challenges the scope, duration, measures, budget, or basic mechanics of program delivery.

Q. Do any intervenors oppose the EE Pilot on prudence or program design grounds?

A. No. No intervenor asserts that the EE Pilot is imprudent, poorly designed, technically flawed, or inconsistent with Pennsylvania policy. To the contrary, intervenors, including the Bureau of Investigation and Enforcement ("I&E"), the Office of Consumer Advocate ("OCA"), and the Office of Small Business Advocate ("OSBA"), either explicitly support the EE Pilot or raise concerns unrelated to its technical feasibility, prudence or core program design.

Q. What are the nature of CAUSE-PA's objections to the Company's EE Pilot?

A. CAUSE-PA does not contend that the EE Pilot is imprudent, technically flawed, or unreasonable as proposed. Rather, CAUSE-PA's testimony reflects policy preferences for expanding the EE Pilot to include a targeted low-income direct install subprogram and related requirements. These recommendations would materially alter the scope and structure of the proposed, voluntary rebate-based pilot and represent requested program expansion, not correction of a defect in the Company's proposal.

Q. Please summarize CAUSE-PA's allegations regarding the Company's proposed EE Pilot.

A. CAUSE-PA alleges, as a matter of policy, that the Company's proposed residential EE Pilot is inequitable and less accessible to some low-income customers because it is structured as a rebate based program that does not eliminate all upfront costs. CAUSE-PA further objects to recovery of EE Pilot costs through a residential rider applicable to all residential customers, including confirmed low-income customers, and recommends that the Commission require the Company to add a targeted low-income EE subprogram, potentially serving customers at or below 200% of the Federal Poverty Level, with no-cost direct installation, income screening, expanded coordination, and enhanced outreach and reporting.

Q. Does CAUSE-PA dispute the technical feasibility, prudence, or projected savings of the EE Pilot?

A. No. CAUSE-PA does not dispute the technical feasibility of the EE Pilot, the reasonableness of the proposed budget, the measures included, or the projected gas savings. CAUSE-PA's objections are policy based and focus on equity and accessibility preferences rather than program imprudence or technical defects.

Q. How does the Company respond to CAUSE-PA's claim that a rebate based design renders the EE Pilot "inaccessible" to low-income customers?

A. CAUSE-PA does not quantify how many low-income customers would be unable to participate, does not present participation data from comparable rebate-based gas EE

programs, and does not distinguish between emergency replacement scenarios and planned replacement decisions. The claim of inaccessibility is therefore not supported by empirical evidence in this record. The Company designed rebate levels to support reasonable customer payback periods, not to reimburse 100 percent of incremental costs for every customer and every circumstance. That design choice is typical of pilot-stage EE programs and reflects the voluntary nature of participation.

Q. Did the Company propose the EE Pilot as a low-income exclusive or emergency repair program?

A. No. The Company did not propose the EE Pilot as a low-income exclusive program or as a replacement for existing emergency or hardship-driven assistance programs. The EE Pilot is a voluntary, residential-only pilot intended to complement, not duplicate, the Company's existing universal service and emergency repair and replacement offerings.

Q. CAUSE-PA argues that the Company did not conduct a standalone analysis of low-income customers' ability to participate. How should the Commission view this argument?

A. The absence of a standalone participation study does not establish that low-income customers cannot participate, nor does it justify requiring a material redesign of the EE Pilot as a condition of approval. Participation levels in a pilot are inherently uncertain prior to implementation. The appropriate regulatory response is to require tracking and reporting

during the pilot period, allowing the Commission to evaluate outcomes based on actual experience rather than speculation.

Q. How does the Company respond to CAUSE-PA's recommendation to require a new targeted low-income EE subprogram with no-cost direct installation for customers at or below 200% of the Federal Poverty Level?

A. These recommendations reflect a preference for program expansion rather than correction of a defect in the EE Pilot as proposed. A no-cost, direct install low-income EE subprogram is not a minor adjustment to a rebate-based pilot; it is a fundamentally different program model with distinct eligibility rules, delivery infrastructure, contractor management requirements, and budget implications.

CAUSE-PA does not identify any statute, regulation, or Commission order requiring that a voluntary gas EE pilot include such a subprogram as a condition of approval. To the contrary, the Commission recently confirmed this principle in its decision approving Columbia Gas of Pennsylvania's 2025 rate case. In that Order, the Commission expressly recognized that Columbia's Phase II Energy Efficiency Plan was voluntary, and held that there is no statutory or regulatory requirement for a natural gas distribution company to fund specific EE measures for households at or below 150% of the federal poverty guidelines. The Commission further declined to impose electric-specific statutory requirements on voluntary gas EE plans in the absence of legislative direction or regulatory mandate. CAUSE-PA's proposal seeks to impose new structural and substantive obligations on a voluntary pilot program without legal support and without demonstrating that the EE Pilot,

as proposed, is deficient or unreasonable. As such, the recommendation represents a policy preference for program expansion rather than a justified condition for approval.

Q. How does Pennsylvania regulatory practice treat emergency or no-cost replacements for low-income customers?

A. Pennsylvania practice demonstrates that emergency and hardship driven no-cost repairs and replacements are typically addressed through Low-Income Usage Reduction Program ("LIURP")-type structures, not through general EE rebate pilots. The Company's approach is consistent with this practice: customers reporting loss of heat are first evaluated for eligibility under emergency repair and replacement pathways; customers who do not qualify may then be directed to the EE Pilot as an alternative option.

Q. CAUSE-PA also recommends extensive coordination, income screening, and outreach requirements. Does the Company oppose coordination?

A. No. The Company supports coordination among energy efficiency, low-income assistance, and weatherization programs and has proposed an integrated, referral-based approach as part of the EE Pilot. As described in the Company's Direct Testimony, the EE Pilot is designed to coordinate with existing low-income programs, including the LIURP and other assistance programs, through bidirectional referrals. Customers who seek participation in the EE Pilot but appear income -eligible for LIURP or other assistance programs may be referred to those programs where deeper, no- cost weatherization services are available. Conversely, customers engaged through assistance or emergency programs who are not

LIURP-eligible may be directed to the EE Pilot to access rebate-based efficiency measures appropriate to their circumstances.

This coordination approach aligns with CAUSE-PA's recommendations, to avoid duplication of services, leverage existing program infrastructure, and ensure that low-income customers are connected to the most appropriate resources based on eligibility and need. It also allows the EE Pilot to complement, rather than replace or redesign, established low-income programs.

However, CAUSE-PA's proposed requirements would go well beyond coordination and effectively convert a voluntary, pilot stage EE program into a comprehensive universal service redesign. Mandating detailed income screening protocols, direct installation obligations, and expansive outreach and contractor requirements at the pilot stage is not necessary to ensure effective coordination, and it exceeds the scope of the Company's proposal.

The Company believes its proposed referral based coordination framework strikes the appropriate balance for a pilot program: it promotes alignment with LIURP and other efficiency and weatherization efforts, maintains clear program boundaries, and preserves flexibility to evaluate results before considering whether broader structural changes are warranted in the future.

Q. How does the Company respond to CAUSE-PA's claim that it is inequitable for low-income customers to pay the EE rider without guaranteed participation?

A. CAUSE-PA's claim assumes that customers receive no benefit unless they directly

participate. That assumption is not consistent with Commission practice recognizing that EE programs may deliver broader customer and system benefits. Moreover, Pennsylvania has approved EE plans and riders for other gas utilities without conditioning approval on guaranteed individual participation for every customer class. CAUSE-PA's objection is therefore a policy argument, not evidence that the proposed rider is unjust or unreasonable.

Q. What outcome does the Company request with respect to CAUSE-PA's allegations and recommendations?

A. The Company respectfully requests that the Commission approve the residential EE Pilot as proposed and decline to impose CAUSE-PA's requested program expansion requirements as conditions of approval. If the Commission determines that additional safeguards are appropriate, those objectives can be addressed through reporting, tracking, and evaluation during the pilot period, without converting a limited, voluntary EE Pilot into a fundamentally different low-income program.

Q. With respect to I&E's recommendation, what reporting requirements do I&E recommend for the Company's EE Pilot?

A. I&E recommends that National Fuel be required to file an annual EE Pilot report, due approximately three months after the end of each program year, containing information on program savings (both Mcf and cost), customer participation, program spending, cost-effectiveness, portfolio highlights, and program delivery updates. I&E further recommends that certain reporting elements be disaggregated for low-income customers and include

tracking of referrals from the EE Pilot to the Company's LIURP and the outcome of those referrals.

Q. Does the Company oppose I&E's recommendation for enhanced transparency and reporting?

A. No. The Company is supportive of reasonable reporting requirements that promote transparency, accountability, and Commission visibility into EE Pilot performance. National Fuel recognizes that reporting is an important tool to evaluate a pilot-stage program and to inform future Commission determinations regarding continuation, modification, or expansion of the EE Pilot.

Q. What considerations do the Company believe should guide the Commission's implementation of reporting requirements?

A. While supportive of reporting, the Company emphasizes that reporting requirements should be proportional to the scale and pilot nature of the program, avoid unnecessary duplication of data already available through other Commission filings, and remain focused on metrics that are actionable and meaningful. Excessive or overly granular reporting obligations risk diverting limited pilot stage administrative resources away from program delivery and customer engagement.

Q. How does the Company view I&E's recommendation for low-income tracking and referral reporting?

A. The Company agrees that tracking low-income participation and referrals is appropriate to evaluate coordination between the EE Pilot and existing universal service programs. I&E's recommendation appropriately focuses on coordination rather than duplication, and National Fuel supports reporting that helps the Commission understand how the EE Pilot interacts with LIURP and related assistance programs.

Q. Does the Company believe that I&E's reporting recommendations require redesigning of the EE Pilot?

A. No. Importantly, I&E does not recommend changes to the program's design, scope, incentives, or cost recovery structure. I&E expressly supports approval and implementation of the EE Pilot as proposed, subject to reasonable reporting safeguards. The Company agrees that reporting requirements can be implemented within the existing program framework without redesigning the Pilot.

Q. What is the Company's position regarding the frequency and scope of reporting?

A. National Fuel supports annual reporting consistent with I&E's recommendation, provided the reporting requirements remain clearly defined and limited to information necessary to evaluate pilot performance. The Company respectfully requests that the Commission avoid layering multiple overlapping reporting obligations or ad-hoc data requests that would impose undue administrative burden inconsistent with the Pilot's limited scale and duration.

Q. What outcome does the Company request regarding I&E's reporting recommendations?

A. The Company respectfully requests that the Commission adopt reasonable, annual reporting requirements consistent with I&E's recommendations, while ensuring that such requirements are not overly burdensome, duplicative, or inconsistent with the pilot-stage nature of the EE Pilot. This approach will preserve transparency and accountability while allowing National Fuel to focus resources on effective program implementation and customer participation.

Q. Why are OCA's National Regulatory Research Institute ("NRRI")-based objections addressed in this rebuttal testimony?

A. This rebuttal testimony addresses OCA's NRRI based objections because OCA asserts that the Company's proposed EE Pilot and related cost recovery mechanism allegedly fail NRRI evaluation criteria for approval of riders or pilot mechanisms. The Company responds to those assertions to clarify the non-binding nature of NRRI guidance and to explain why OCA's reliance on those criteria does not warrant denial or modification of the proposal.

Q. What are the "NRRI evaluation criteria" referenced by OCA?

A. The criteria cited by OCA originate from guidance and policy research published by the NRRI, an organization affiliated with the National Association of Regulatory Utility Commissioners. NRRI publications commonly discuss general considerations for evaluating

alternative cost recovery mechanisms, including whether the costs in question are material, volatile or unpredictable, and largely outside management control. These considerations are intended to inform regulatory analysis; they do not constitute binding standards or Commission rules.

Q. Are NRRI criteria binding on the Pennsylvania Public Utility Commission?

A. No. NRRI guidance does not establish legal requirements, mandatory tests, or enforceable standards. The Commission is not bound by NRRI criteria, and NRRI itself does not claim that its guidance limits Commission discretion. Rather, NRRI guidance is designed to support regulatory judgment, not replace it.

Q. How has the Commission historically evaluated riders and pilot mechanisms?

A. The Commission has consistently evaluated riders and pilot mechanisms on a case-specific basis, considering factors such as policy objectives, scope, duration, customer protections, and reporting requirements. The Commission's decisions demonstrate that no single analytical framework, including NRRI guidance, is dispositive. Instead, the Commission exercises broad ratemaking discretion based on the specific facts and objectives presented in each proceeding.

Q. Does NRRI guidance prohibit approval of pilot programs recovered through riders?

A. No. NRRI does not prohibit pilot-specific cost recovery mechanisms. In fact, NRRI publications recognize that commissions may approve pilots or alternative recovery

mechanisms where they advance legitimate regulatory or public policy goals, particularly when they are time-limited, transparent, and subject to evaluation or sunset provisions. OCA's characterization of NRRI guidance as a threshold requirement overstates NRRI's role.

Q. How does the Company's proposed EE Pilot align with these principles?

A. The EE Pilot is a limited duration, narrowly scoped program intended to evaluate energy efficiency approaches in Pennsylvania using experience drawn from other jurisdictions where National Fuel operates similar programs. The costs are clearly defined, modest in scale relative to the Company's overall revenue requirement, and subject to reporting and Commission review. These features are consistent with regulatory principles governing pilot programs.

Q. OCA argues that the EE Pilot costs are "within management control." How do you respond?

A. While the Company designs and administers the EE Pilot, that fact alone does not make the proposal unreasonable or unsuitable for a pilot recovery mechanism. The EE Pilot is not an ordinary discretionary operating expense; it is a program submitted for Commission approval precisely because it implicates customer affordability, usage behavior, and long-term system planning. Treating the EE Pilot exclusively as a base-rate expense would reduce transparency, dilute cost accountability, and delay meaningful Commission oversight during the pilot period.

Q. Does the absence of cost volatility or external drivers render the pilot unreasonable?

A. No. The Commission has approved pilot mechanisms and riders for reasons other than volatility alone, including the need for discrete cost tracking, enhanced transparency, and limited customer exposure while program effectiveness is evaluated. Volatility is one consideration among many, not a prerequisite for Commission approval.

Q. How does the proposed recovery mechanism protect customers?

A. The EE Pilot is time limited, subject to reporting and review, and does not commit customers to ongoing costs beyond the pilot period. These features preserve the Commission's ability to modify, expand, or terminate the program based on actual experience, ensuring that customers are not exposed to untested or open-ended financial commitments.

Q. Is the Company's proposed recovery mechanism consistent with how other Pennsylvania utilities recover energy efficiency costs?

A. Yes. The Company's proposed recovery mechanism is fully consistent with Pennsylvania regulatory practice.

All electric distribution companies subject to Act 129 recover the costs of their mandatory Energy Efficiency and Conservation Plans through Commission approved riders that track program costs and adjust rates accordingly. While natural gas distribution companies are not subject to Act 129, the Commission has approved the use of rider

mechanisms for voluntary natural gas energy efficiency programs as well.

Specifically, the Commission-approved voluntary energy efficiency programs of Columbia Gas of Pennsylvania, Inc. and UGI Utilities, Inc. – Gas Division recover program costs through dedicated energy efficiency riders. These riders allow program costs to be transparently tracked, periodically reviewed, and recovered separately from base rates, while preserving Commission oversight and minimizing financial risk to customers.

The Company's proposed recovery mechanism follows this same Commission-approved model by using a rider to recover pilot-related costs in a transparent and controllable manner. Consistent with Pennsylvania practice, this approach supports regulatory oversight, limits customer exposure, and ensures that recovery is aligned with actual program experience rather than embedded in base rates.

Q. In your view, do OCA's NRRI based arguments demonstrate that the EE Pilot is unjust or unreasonable?

A. No. OCA's reliance on NRRI evaluation criteria reflects one analytical perspective, but it does not demonstrate that the EE Pilot or its proposed recovery mechanism is unjust or unreasonable. At most, it highlights considerations the Commission may weigh alongside other policy, operational, and customer-focused factors. The Commission retains full discretion to approve pilot programs that serve legitimate regulatory objectives and include appropriate safeguards.

Q. What is your overall conclusion regarding the cost recovery mechanism?

A. The Company's proposed EE Pilot and associated recovery mechanism are reasonable, measured, and consistent with Pennsylvania regulatory practice. NRRI guidance does not prohibit approval of the proposal, nor does it override the Commission's discretion. For these reasons, the Commission should reject OCA's NRRI-based objections and approve the EE Pilot as proposed.

Q. What recommendation does OSBA make with respect to the Company's EE Pilot?

A. The OSBA supports approval of the Company's proposed residential EE Pilot but recommends that National Fuel expand the pilot to include a non-residential EE program, citing the Company's experience operating a non-residential EE program in New York.

Q. Does OSBA contend that the Company's proposed residential EE Pilot is unreasonable or incomplete absent a non-residential component?

A. No. OSBA does not argue that the residential EE Pilot is unjust, unreasonable, deficient, or incomplete without a non-residential component. OSBA does not recommend disallowance of program costs, does not challenge the design or scope of the residential pilot, and does not oppose the proposed cost recovery mechanism. OSBA's recommendation is prospective in nature and does not assert that inclusion of a non-residential program is required for approval of the EE Pilot in this proceeding.

Q. Why does the Company oppose expanding the EE Pilot to include non-residential customers in this docket?

A. The Company opposes expanding the EE Pilot to include non-residential customers at this time because doing so would materially alter the scope, objectives, and evaluation framework of the pilot proposal presented for Commission review. The EE Pilot in this case was intentionally designed as a targeted, residential-focused pilot, allowing the Commission to evaluate program performance, customer response, and administrative execution on a manageable and well-defined scale before considering broader expansion.

Q. Why is limiting the scope of the pilot important from a regulatory perspective?

A. Pilot programs are most effective when they are clearly scoped, limited in duration, and narrowly focused, enabling regulators and stakeholders to assess results without introducing additional complexity or confounding variables. Expanding the pilot to include non-residential customers would introduce materially different load profiles, decision-making processes, rebate structures, and participation dynamics, undermining the pilot's evaluative purpose and making it more difficult to draw meaningful conclusions from initial program results.

Q. Does the Company dispute that it has experience operating a non-residential EE program in New York?

A. No. The Company does not dispute that its New York operations include both residential and non-residential EE programs. However, the existence of programs in another

jurisdiction does not, by itself, establish that immediate expansion is appropriate in Pennsylvania, particularly in the context of an initial, limited scope EE Pilot proposed for Commission approval in this docket.

Q. Does the Company believe non-residential EE programs may be considered in the future?

A. Yes. The Company does not foreclose the possibility of proposing non-residential EE offerings in the future. However, such consideration should occur after the Commission has had the opportunity to evaluate the performance of the residential EE Pilot based on actual experience and results, and through a separate proposal that fully addresses program design, cost allocation, customer impacts, and administrative requirements specific to non-residential customers.

Q. What is the Company's overall position on OSBA's recommendation?

A. While the Company appreciates OSBA's support for the residential EE Pilot, it respectfully submits that expansion to non-residential customers is premature and unnecessary for purposes of this proceeding. The Commission can approve the residential EE Pilot as proposed without prejudicing future consideration of non-residential EE programs, preserving regulatory flexibility while ensuring disciplined, data-driven program development.

Q. As you conclude your rebuttal testimony, how do budget considerations reinforce the Company's position regarding the recommendations advanced by CAUSE-PA and OSBA?

A. As discussed earlier in this testimony in response to CAUSE-PA's request for a low-income direct install subprogram and OSBA's recommendation for nonresidential expansion, the Company's proposed budget was developed solely to support the scope, scale, and objectives of the residential, rebate-based EE Pilot as filed. The proposed budget does not include, and was not designed to accommodate, the additional program elements recommended by other parties.

Q. Would the Company's proposed EE Pilot budget be sufficient to implement the additional program elements recommended by CAUSE-PA or OSBA?

A. No. Both recommendations would materially expand the scope and cost structure of the EE Pilot. For example, a low-income direct install program would shift the program from providing partial rebates to covering the entire cost of equipment, installation, and program administration for each participating customer, along with income verification, contractor procurement and oversight, enhanced coordination, and quality control. As a result, the cost per participating customer would increase from a modest, incentive based contribution to a fully funded, turnkey service, representing a multiple fold increase in per-participant costs relative to the proposed rebate based pilot. Similarly, even a limited nonresidential EE offering could require higher incentives, site specific engineering reviews, additional staffing, and separate evaluation frameworks not reflected in the residential pilot budget.

Q. How should the Commission consider these recommendations from a budgetary perspective?

A. From a budgetary standpoint, the recommendations advanced by CAUSE-PA and OSBA are best understood as requests for new or expanded programs, not refinements to the EE Pilot proposal before the Commission. While the EE Pilot approval as filed does not preclude future consideration of such programs, those proposals should be evaluated separately with their own defined scope, budgets, and supporting analyses, rather than imposed on a limited, pilot-stage program designed and funded for a narrower and clearly defined purpose.

Q. Does this conclude your rebuttal testimony at this time?

A. Yes, it does.

NATIONAL FUEL STATEMENT NO. 19

JOHN D. TAYLOR

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 19

Direct Testimony of
John D. Taylor

Topics Addressed: **Cost of Service Study**
Weather Normalization Adjustment

Dated: January 28, 2026

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is John D. Taylor and my business address is 10 Hospital Center Commons, Suite 400, Hilton Head Island, South Carolina 29926.

Q. On whose behalf are you appearing in this proceeding?

A. I am appearing on behalf of National Fuel Gas Distribution Corporation's ("NFGDC") Pennsylvania Division ("National Fuel" or the "Company").

Q. By whom are you employed and in what capacity?

A. I am employed by Atrium Economics, LLC ("Atrium") as a Managing Partner.

Q. Have you prepared an Exhibit describing your professional qualifications?

A. Yes. National Fuel Exhibit JDT-1 presents my professional qualifications.

Q. What was Atrium's assignment in this proceeding?

A. National Fuel requested Atrium to conduct a fully allocated Cost of Service Study ("ACOSS") to determine the embedded costs of serving the Company's gas distribution customers and support its rate design efforts. In this regard, I am sponsoring the ACOSS that allocates National Fuel's gas distribution costs to its rate classes. Additionally, Atrium supported the Company's proposal to convert the Weather Normalization Adjustment ("WNA") from a pilot to a permanent mechanism.

Q. Please summarize your testimony.

A. In my testimony I present National Fuel's ACOSS and discuss its results, as well as the revenue increase apportionment to National Fuel's rate classes, which are used to design rates by Company witness Courtney T. Mann (National Fuel Statement No. 14). My testimony consists of this introduction and summary section and the following additional sections:

- Purpose and Principles of Cost Allocation
- National Fuel's ACOSS
- Determination of National Fuel's Proposed Class Revenues

Additionally, I am supporting the Company's Weather Normalization Adjustment ("WNA") proposal.

Q. What exhibits are you sponsoring in this proceeding?

A. I am sponsoring National Fuel Exhibit D – Cost of Service Study ("Exhibit D"). I also am sponsoring the following Exhibits:

- National Fuel Exhibit JDT-1 – Resume
- National Fuel Exhibit JDT-2 – Proposed Revenue Targets by Class
- National Fuel Exhibit JDT-3 – WNA Mechanism Policy Factors

II. PURPOSE AND PRINCIPLES OF COST ALLOCATION

Q. What is the general purpose and use of an ACOSS in regulatory proceedings?

A. The purpose of an ACOSS is to allocate the gas distribution utility's overall fully projected future test year ("FPFTY") costs to the various classes of service in a manner

that reflects the relative costs of providing service to each class. An ACOSS represents an analysis of which customer or group of customers cause the utility to incur the costs to provide service. The requirement to develop the ACOSS results from the nature of utility costs. Utility costs are characterized by the existence of common costs. Common costs occur when the fixed costs of providing service to one or more rate classes, or the cost of providing multiple products to the same rate class, use the same facilities and the use by one rate class precludes the use by another rate class.

In addition, utility costs may be fixed or variable in nature. Fixed costs do not change with the level of gas throughput, while variable costs change directly with changes in gas throughput. Non-fuel-related utility costs are fixed in the short run and do not vary with changes in customers' loads. This includes the cost of distribution mains, service lines, meters, and regulators. While certain operating inputs like odorant may vary modestly with volumes, those costs are de minimis and do not alter the fundamentally fixed nature of distribution costs.

Finally, the ACOSS provides different contributions to the development of economically efficient rates and the cost responsibility by rate class. This is accomplished through analyzing costs and assigning each rate class its proportionate share of the utility's total revenues and costs within the test year. The results of these studies can be utilized to determine the relative cost of service for each rate class to help determine the individual class revenue responsibility and provide guidance with rate design. Using the cost information per unit of demand, customer, and commodity developed in the ACOSS to understand and quantify the allocated costs in each rate class is a useful step in the rate design process to guide the development of rates.

Q. Is the preparation of an ACOSS an exact science?

A. No. The fundamental purpose of an ACOSS is to aid in the design of rates to be charged by identifying all of the capital and operating costs incurred by a utility to provide service to all of its customers and then assigning or allocating those costs to individual rate classes based on how those rate classes cause the costs to be incurred. The allocation of costs using an ACOSS is a practical requirement of utility regulation since rates are based on the cost of service for the utility under a cost-based regulatory model. As a general matter, utilities must be allowed a reasonable opportunity to earn a return of and on the assets used to serve their customers, with such return on being reflective of a fair rate of return. This is the cost-of-service standard and equates to the revenue requirements for utility service. The opportunity for the utility to earn its allowed rate of return depends on the rates applied to customers producing revenues that equate to the level of the revenue requirement.

Q. Is there a guiding principle that supports the appropriate allocation of costs?

A. Yes, a fundamental foundational principle, cost causation, should be followed to produce accurate and reasonable results. Cost causation addresses the need to identify which customer or group of customers causes the utility to incur particular types of costs, so the analysis results in an appropriate allocation of the utility's total revenue requirement among the various rate classes. In other words, the costs assigned or allocated to particular customers should be those costs that the particular customers caused the utility to incur because of the characteristics of the customers' usage of utility service.

Q. How do you establish the cost and utility service relationships?

A. An important element in the selection and development of a reasonable ACOSS methodology is the establishment of relationships between customer requirements, load profiles, and usage characteristics on the one hand and the costs incurred by the company in serving those requirements on the other hand. To accomplish this, I reviewed National Fuel's expense and plant accounts, operational data, usage information, and conducted interviews with National Fuel employees. The details and data gathered provided information on the key factors that cause the costs to vary and supported studies of the relative costs of providing facilities and services for each rate class. From the results of those analyses, methods of direct assignment and common cost allocation methodologies can be chosen for the utility's plant and expense elements.

Q. What are the steps to performing an ACOSS?

A. A three-step analysis of the utility's total operating costs must be undertaken to establish each customer class's cost responsibility. The three steps that are the basis to conduct an ACOSS are (1) cost functionalization, (2) cost classification, and (3) cost allocation.

Q. Please describe cost functionalization.

A. The first step, cost functionalization, identifies and separates plant and expenses into specific categories based on the various characteristics of utility operation. National Fuel's primary functional cost categories associated with natural gas distribution services include gas supply, transmission, distribution, and customer. Indirect costs that support

these functions, such as general plant and administrative and general expenses, are allocated to functions using allocation factors related to plant and/or labor ratios, i.e., internal allocation factors.

Q. Please describe cost classification.

A. The second step, cost classification, further separates the functionalized plant and expenses according to the primary factors that determine the amount of costs incurred. These factors are: (1) the number of customers; (2) the need to meet the peak demand requirements that customers place on the gas distribution system; and (3) the amount of gas consumed by customers. These classification categories have been identified for purposes of the ACOSS as: (1) customer costs; (2) demand costs; and (3) commodity costs, respectively.

Q. Please describe the types of costs contained in the customer cost, demand cost, and commodity cost categories.

A. Customer-related costs are incurred to attach a customer to the gas distribution system, meter any gas usage, and maintain the customer's account. Customer costs are a function of the number of customers served by the utility and continue to be incurred whether or not the customer uses any gas. They may include capital costs associated with minimum size distribution mains, services, meters, regulators, customer service, and accounting expenses.

Demand or capacity related costs are associated with plant that is designed, installed, and operated to meet maximum hourly or daily gas flow requirements, such as

the utility's transmission and distribution mains, or more localized distribution facilities that are designed to satisfy individual customer maximum demands. Gas supply contracts also have a capacity related component of cost relative to National Fuel's requirements for serving daily peak demands and the winter peaking season.

Commodity related costs are those costs that vary with the throughput sold to, or transported for, customers. Costs related to gas supply are classified as commodity because they vary with the amount of gas volumes purchased by National Fuel for its customers.

Q. Please describe the cost allocation process.

A. The final step is the allocation of each functionalized and classified cost element to the individual rate class. Costs typically are allocated on customer, demand, commodity, or revenue allocation factors. From a cost-of-service perspective, the best approach is a direct assignment of costs where costs are incurred by a customer or class of customers and can be so identified. Where costs cannot be directly assigned, the development of allocation factors by rate class uses principles of both economics and engineering. This results in appropriate allocation factors for different elements of costs based on cost causation. For example, we know from the way customers are billed that each customer requires a meter. Meters differ in size and type depending on the customer's load characteristics. These meters have different costs based on size and type. Therefore, differences in the cost of meters are reflected by using a different average meter cost for each class of service.

Q. Are there factors that can influence the overall cost allocation framework utilized by a gas utility when performing an ACOSS?

A. Yes. First, the fundamental and underlying philosophy applicable to all cost studies pertains to the concept of cost causation for purposes of allocating costs to customer groups. Cost causation addresses the question – which customer or group of customers causes the utility to incur particular types of costs? To answer this question, it is necessary to establish a linkage between a utility's customers and the particular costs incurred by the utility in serving those customers. The factors that can influence the cost allocation used to perform an ACOSS include: (1) the physical configuration of the utility's gas system; (2) the availability of data within the utility; and (3) the state regulatory policies and requirements applicable to the utility.

Q. Why are these considerations relevant to conducting National Fuel's ACOSS?

A. It is important to understand these considerations because they influence the overall context within which a utility's cost study was conducted. In particular, they provide an indication of where efforts should be focused for purposes of conducting a more detailed analysis of the utility's gas system design and operations and understanding the regulatory environment in the state the utility operates in as it pertains to cost-of-service studies and gas ratemaking issues.

Q. How does the availability of data influence an ACOSS?

A. The structure of the utility's books and records can influence the cost study framework.

This structure relates to attributes such as the level of detail, segregation of data by operating unit or geographic region, and the types of load data available.

Q. How do state regulatory policies affect a utility's ACOSS?

A. State regulatory policies and requirements prescribe whether there are any historical precedents used to establish utility rates in the state. Specifically, state regulations and past precedents set forth the methodological preferences or guidelines for performing cost studies or designing rates, which can influence the proposed cost allocation method utilized by the utility.

III. NATIONAL FUEL'S ALLOCATED COST OF SERVICE STUDY

Q. Please describe the Atrium Model used in conducting the ACOSS filed in this proceeding.

A. National Fuel has selected the Atrium excel based model ("Atrium ACOSS Model") to conduct the ACOSS in this general base rate case. Atrium developed the Atrium ACOSS Model on a proprietary basis for its consulting engagements and has been used in multiple jurisdictions. This is the same model I sponsored in the last Company's base rate case at Docket No. R-2022-3035730.

Q. Please describe the process of performing National Fuel's ACOSS presented in this filing.

A. The detailed process description of National Fuel's ACOSS analysis is presented in Exhibit D, providing a full scope of the process including the development of allocation factors

that support various cost of service studies presented in this proceeding as discussed below.

Q. Please discuss the content of the ACOSS Exhibit D.

A. Exhibit D provides the information required under 52 Pa. Code § 53.53(a)(1) and, in particular, Exhibit A - Gas Utilities, by providing a cost-of-service study that fully distributes the Pennsylvania jurisdictional costs of providing retail distribution service to the various rate classes at both present and proposed rates. See 52 Pa. Code § 53.53(a)(1), Exhibit A. The studies contained in National Fuel Exhibit D are based on costs and operating conditions for the Fully Projected Future Test Year Ended October 31, 2027 ("FPFTY").

Exhibit D consists of three sections detailing the process of developing the ACOSS. Section I – Introduction includes an introduction, the general purpose and process of the ACOSS, as well as an overview of the excel-based fully functional ACOSS model presented in this proceeding. Section II – National Fuel's Cost of Service Procedures presents the ACOSS development process specific to the Company, including the Functionalization, Classification, and Allocation of costs. The Allocation section (Section II.3) describes all internal and external allocation factors and the allocation processes used in the ACOSS. The last section, Section III – National Fuel's Cost of Service Results depicts the results of the ACOSS.

Q. Please describe the schedules included in Exhibit D.

A. The following is the list of Schedules included in Exhibit D:

- Schedule 1 - Account Balances and Allocation Methods
- Schedule 2 - External Allocation Factors
- Schedule 3 - Internal Allocation Factors

- Schedule 4 - Comparison of Cost of Service with Revenues under Present and Proposed Rates
- Schedule 5 - Cost of Service and Rate of Return under Present and Proposed Rates
- Schedule 6 - Cost of Service Allocation Study Fully Projected Future Test Year
- Schedule 7 - Functionalized and Classified Rate Base and Revenue Requirement, and Unit Costs by Customer Class

Q. What was the source of the cost data analyzed in the Company's ACOSS?

A. All cost-of-service data was extracted from the Company's total cost of service (i.e., total revenue requirement) and schedules contained in this general rate case filing for the FPFTY ending October 31, 2027. Where more detailed information was required to perform various analyses related to certain plant and expense elements, the data were derived from the historical books and records of the Company and information provided by Company personnel.

Q. How are the National Fuel rate classes structured for purposes of conducting its ACOSS?

A. For National Fuel's ACOSS, I included nine rate classes:

- Residential Service
- Small Commercial & Public Authority Service < 250 Mcf ("SCPA-LL")
- Small Commercial & Public Authority Service > 250 Mcf ("SCPA-UL")
- Large Commercial & Public Authority Service ("LCPA")
- Small Volume Industrial Service ("SVIS")
- Intermediate Volume Industrial Service ("IVIS")
- Large Volume Industrial Service ("LVIS")
- Large Industrial Service ("LIS")
- Natural Gas Vehicle Service ("NGV")

Q. Do you propose any modification to the current customer classes?

A. No. I am not proposing any modifications to the existing customer classes. The current

class structure aligns with the Company's approved tariff schedules and is consistent with the configuration adopted in the Company's most recent general rate case, Docket No. R-2022-3035730 ("2022 Case").

Q. How are Distribution Mains classified and allocated in the ACOSS?

A. The ACOSS presented in Exhibit D was performed utilizing a peak allocation methodology with distribution mains classified as demand and customer related. The Company classified 61% of its investment in distribution mains as customer-related and 39% of the investment as demand-related. The customer-related portion of the distribution mains investment was then allocated to the rate classes based on the number of customers on National Fuel's system. The demand-related portion was allocated to the rate classes based on their respective contribution to the Company's peak day demand under system design and weather conditions, in other words, on a "design day" basis. Transmission mains are allocated to the customer classes based on the contribution to peak day demand. Peak demand represents estimated class peak day requirements. The peak day requirements are estimated based on regression analysis of monthly sales and heating degree days and analysis of winter period throughput to average throughput. Total throughput represents the total throughput for each class during the FPFTY.

Q. How are other plant related costs allocated in the ACOSS?

A. The ACOSS model also relies on special cost studies for meters, services, and regulators. The investments in service lines, meters, meter installation, and regulators are allocated considering customer weighing factors and the relative cost of the investment where

applicable. For a detailed explanation of the allocation factors development please refer to the narrative descriptions presented in Exhibit D with the allocation factors provided in Exhibit D Schedule 2. Miscellaneous Intangible Plant and General Plant accounts are allocated based on labor costs. All plant investment-related accumulated amortization and depreciation expenses follow the classification and allocation of the plant.

Q. Please explain the basis for the Company's choice of classification and allocation methods for Mains.

A. It is widely accepted that distribution mains are installed to meet both system peak period load requirements and to connect customers to the local distribution company's ("LDC") gas system. Therefore, to ensure that the rate classes that cause the Company to incur this plant investment or expense are charged with its cost, distribution mains should be allocated to the rate classes in proportion to their peak period load requirements and number of customers.

There are two cost factors that influence the level of distribution mains facilities installed by an LDC in expanding its gas distribution system. First, the size of the distribution main (i.e., the diameter of the main) is directly influenced by the sum of the peak period gas demands placed on the LDC's gas system by its customers. Secondly, the total installed footage of distribution mains is influenced by the need to expand the distribution system grid to connect new customers to the system. Therefore, to recognize that these two cost factors influence the level of investment in distribution mains, it is appropriate to allocate such investment based on both peak period demands and the number of customers served by the LDC.

Q. Is the method used by the Company to determine a customer cost component of distribution mains a generally accepted technique for determining customer costs?

A. Yes. The two most commonly used methods for determining the customer cost component of distribution mains facilities consist of the following: (1) the zero-intercept approach and (2) the most commonly installed, minimum-sized unit of plant investment. Under the zero-intercept approach, a customer cost component is developed through regression analyses to determine the unit cost associated with a zero-inch diameter distribution main. The method regresses unit costs associated with the various sized distribution mains installed on the LDC's gas system against the size (diameter) of the various distribution mains installed. The zero-intercept method seeks to identify that portion of plant representing the smallest size pipe required merely to connect any customer to the LDC's distribution system, regardless of the customer's peak or annual gas consumption.

Two of the more commonly accepted literary references relied upon when preparing embedded cost of service studies, Electric Utility Cost Allocation Manual, by John J. Doran et al, National Association of Regulatory Utility Commissioners, and Gas Rate Fundamentals, American Gas Association, both describe minimum system concepts and methods as an appropriate technique for determining the customer component of utility distribution facilities. The existence and utilization of a customer component of distribution facilities, specifically for distribution mains, is a fully supportable and commonly used approach in the gas industry.

For purposes of determining the customer component of distribution mains to be

used in National Fuel's ACOSS, the zero-intercept method was employed. Please refer to Exhibit D for the detailed study development process and results.

Q. With respect to National Fuel's specific experience, is there demonstrable evidence to support the use of a customer component of distribution mains?

A. Yes. In developing an appropriate cost allocation basis for distribution mains, the two methods of cost analysis mentioned in the previous response were conducted for the Company's investment in distribution mains, by size and material type of main installed. The zero-intercept method typically uses regression analysis to compare unit costs of the various sized distribution mains installed on National Fuel's gas system against the size (diameter) of the various distribution mains installed. This method seeks to identify that portion of plant representing the smallest size pipe required merely to connect any customer to the LDC's distribution system, regardless of its peak or annual consumption. This regression determines that regardless of the main's diameter, the average cost of a distribution main on National Fuel's gas system will be at least equal to a minimum cost per installed foot. This per foot cost component is exclusively related to the simple fact that National Fuel incurs this cost to install a main, regardless of its size. That is, the installation is unrelated to either peak gas flows or average gas flows, but relating to site prep, permitting, trenching, and recovering. These distinct costs are related more strongly to the process of extending the distribution mains to connect customers, which is a function of the length of distribution mains and not of the size or diameter of the mains.

Q. What method was utilized in National Fuel's 2022 Case to classify and allocate

distribution mains?

A. In the 2022 Case, National Fuel presented ACOSS results using both the customer demand method presented in this case and a peak and average method which allocates distribution mains using what is commonly referred to as the "Seaboard" method, which involves a 50% weighting of peak contribution by the class and 50% weighting of annual throughput.

Q. Can you please provide more details on the Seaboard method?

A. The "Seaboard" methodology of assigning utility cost to classes was developed in the early 1950s as part of the Federal Energy Regulatory Commission ("FERC") rate regulation process for interstate gas pipelines and is based on the premise that both peak and annual usage are of equal importance in determining the cost responsibility of each class. As used at the FERC, this methodology had more to do with rate design and the recovery of revenues than cost allocation and causation. It was developed when gas pipelines sold gas to all their customers including large commercial and industrial customers, when both capacity costs and commodity costs were recovered in the same rates before the advent of purchased gas adjustment mechanisms. With the deregulation of gas within the gas industry in the 1980s, these large customers were given the choice to buy their gas commodity from a producer or marketer and the LDC only provided the delivery of that gas on their distribution system. Other Commissions, including originally the Federal Power Commission, and later, the FERC, moved away from the 50/50 weighting of demand and commodity in favor of a 75 percent demand 25 percent commodity weighting known as the "United" method. FERC adopted the United method

in 1973. After United, in 1983 FERC departed from a percentage weighting for demand and commodity allocations to a Modified Fixed variable approach which allocated all fixed costs based on demand and all variable costs based on commodity.

Q. Has the Seaboard method been relied upon in PA in past gas LDC filings and been under review by the Pennsylvania Public Utility Commission's ("PAPUC" or the "Commission")?

A. Yes. While the PAPUC has recognized a customer component of gas utility infrastructure in recent history, the PAPUC has recently relied on allocating a portion of distribution mains on the annual usage rather than the cost causative basis of matching the allocation of costs with the occurrence of the costs. Given this history, for informational and comparison purposes, I also provide results of the ACOSS model that allocates Distribution Mains using Peak and Average ("P&A") methodology with no customer component.

Q. How are operation and maintenance ("O&M"), customer, and administrative and general ("A&G") expenses classified and allocated in the ACOSS?

A. A utility's O&M expenses generally are thought to support the utility's corresponding plant in service accounts. In general, O&M expenses are allocated based on the cost allocation methods used for the Company's corresponding plant accounts. The majority of customer accounts and services expenses were classified as customer-related costs and allocated based on the average number of distribution customers by class or relative weighting factors based on special studies. A&G expenses were allocated on an account-

by-account basis. Items related to labor costs, such as employee pensions and benefits, were allocated based on O&M labor costs. Items related to plant, such as maintenance of general plant and property taxes, were allocated based on plant. The detailed classification and allocation methods applied to these expense categories can be found on Schedule 1 of Exhibit D.

Q. How are all other cost categories allocated in the ACOSS?

A. Taxes other than income are allocated in a manner that reflected the specific cost associated with each tax expense category. Generally, taxes can be cost classified on the basis of the tax assessment method established for each tax category and can be grouped into the following categories: (1) labor; (2) plant; and (3) revenue. In the National Fuel ACOSS, all non-income taxes were assigned to one of the above stated categories and relevant allocation factors.

Current income taxes were allocated based on each class's net income before taxes. Income taxes for the total revenue requirement were allocated to each class based on the allocation of the required net income by rate class. Income taxes at proposed revenues by class were allocated to each class based on the proposed income prior to taxes for each class. The detailed classification and allocation methods are shown on Schedule 1 of Exhibit D.

Q. Does National Fuel's ACOSS include gas commodity costs?

A. Yes. The ACOSS does include gas commodity costs and gas commodity revenues which are both functionalized to the gas supply function with a net income of zero, since the gas

commodity costs match gas commodity revenues.

Q. Have you provided all workpapers and studies supporting the ACOSS?

A. Yes. All supporting workpapers, calculations, and documentation to the filed ACOSS model are provided in response to the Supplemental Data Requests – Cost of Service accompanying the Company's filing.

Q. Please summarize the results of National Fuel's ACOSS.

A. Table 1 below presents a summary of the results of the Company's ACOSS that can be reviewed in detail in Schedule 5 of Exhibit D. The ACOSS shows an overall revenue deficiency to the Company of $19.7 million.

Table 1 - Summary Results of the Company's ACOSS

Rate Classes	Current Revenues	Cost to Serve	Current Rate of Return	Deficiency /(Surplus)	Revenue to Cost Ratio	Parity Ratio
Residential	$ 97,367	$ 126,095	3.2%	$ 28,728	0.77	0.88
SCPA-LL	6,819	7,330	7.8%	511	0.93	1.06
SCPA-UL	6,989	7,287	8.7%	298	0.96	1.10
LCPA	13,908	8,972	22.5%	(4,936)	1.55	1.77
NGV	131	203	2.1%	72	0.65	0.74
SVIS	444	319	22.2%	(125)	1.39	1.59
IVIS	5,876	3,491	25.5%	(2,385)	1.68	1.93
LVIS	2,730	1,286	35.0%	(1,444)	2.12	2.43
LIS	2,470	1,416	25.8%	(1,054)	1.74	2.00
Total	$ 136,735	$ 156,400	6.3%	$ 19,665	0.87	1.00
Other Revenues	4,219	4,234		15		
Total System	$ 140,953	$ 160,634		$ 19,681		

Table 1 presents the revenue deficiency/excess for each rate class, the class rate of return on net rate base at current rates, the revenue to cost ratio, and the associated parity ratio. Regarding rate class revenue levels, the results show that all classes except Residential,

SCPA-LL, SCPA-UL and NGV are being charged rates that recover more than their indicated costs of service.

Q. How do the results of the customer demand method of allocating distribution mains compare to the Seaboard method of allocating distribution mains?

A. Table 2 below provides a comparison between the two methods. As is expected using the Seaboard method increases the allocation of costs to those classes with higher load factors and large volumes of annual throughput.

Table 2 – Comparison of Customer / Demand and Peak and Average

Rate Classes	Cost to Serve (Cust/Dem)	Cost to Serve (Peak and Average)	Difference
Residential	$ 126,095	$ 108,557	$ 17,538
SCPA-LL	7,330	$ 6,712	618
SCPA-UL	7,287	$ 8,956	(1,669)
LCPA	8,972	$ 15,817	(6,846)
NGV	203	$ 298	(95)
SVIS	319	$ 393	(75)
IVIS	3,491	$ 7,066	(3,574)
LVIS	1,286	$ 3,518	(2,232)
LIS	1,416	$ 5,081	(3,665)
Total	$ 156,400	$ 156,400	-
Other Revenues	4,234	4,234	-
Total System	$ 160,634	$ 160,634	-

IV. NATIONAL FUEL'S PROPOSED CLASS REVENUES

Q. Please describe the proposed approach to apportion National Fuel's proposed revenue increase to its rate classes.

A. The apportionment of revenues among rate classes consists of deriving a reasonable

balance between various criteria or guidelines that relate to the design of utility rates.[1] The various criteria that were considered in the process included: (1) cost of service; (2) class contribution to present revenue levels; and (3) customer impact considerations.

After discussions with the Company, the increase proposed in this case was allocated based on considerations of the current parity percentages shown above in Table 1 and the desire to move toward full parity over time while addressing issues of gradualism. National Fuel proposes to:

- For those classes with a revenue to cost parity ratio below 1.0 an increase of 1.1 times the system increase is proposed. This applies to the Residential class and NGV class.
- For those classes with a revenue to cost parity ratio above 1.0 but below 1.5 an increase of 0.9 times the system increase is proposed. This applies to the SCPA-LL and SCPA-UL classes.
- For all other classes with revenue to cost parity ratios above 1.5 an increase of 0.67 times the system increase is proposed. The 0.67 was set to recover the remaining requested increase. This applies to the LCPA, SVIS, IVIS, LVIS, and LIS classes.

The amounts of the existing rate subsidies and excesses among the Company's rate classes were generally reduced. From a class cost of service standpoint, this type of

[1] Revenue apportionment is part of the overall rate design process, which is guided by the principles broadly accepted in the recognized literature on utility ratemaking and regulatory policy. These principles include: (1) Cost of Service; (2) Efficiency; (3) Value of Service; (4) Stability/Gradualism; (5) Non-Discrimination; (6) Administrative Simplicity; and (7) Balanced Budget. These rate design principles draw heavily upon the "Attributes of a Sound Rate Structure" developed by James Bonbright in Principles of Public Utility Rates (Principles of Public Utility Rates, Second Edition, Page 111-113 James C. Bonbright, Albert L. Danielson, David R. Kamerschen, Public Utility Reports, Inc., 1988)

class movement, and reduction in class rate subsidies, is desirable to move class revenues and rates closer to the indicated cost of service for each rate class.

Q. What are the percentage changes in revenues by rate class resulting from the Company's proposed revenue apportionment?

A. Table 3 below summarizes the proposed distribution margin revenue change for each rate class and the percent change in distribution margin revenues resulting from the above-described process.

Table 3 - Proposed Class Revenue Apportionment

Rate Classes	Margin Revenues at Current Rates	Margin Revenues at Proposed Rates	Proposed Revenue Change	Percent Change	Increase Relative to System Increase
Residential	$ 97,367	$ 112,771	$ 15,404	15.82%	1.10
SCPA-LL	$ 6,819	$ 7,702	$ 883	12.94%	0.90
SCPA-UL	$ 6,989	$ 7,893	$ 905	12.94%	0.90
LCPA	$ 13,908	$ 15,249	$ 1,342	9.65%	0.67
NGV	$ 131	$ 152	$ 21	15.82%	1.10
SVIS	$ 444	$ 487	$ 43	9.65%	0.67
IVIS	$ 5,876	$ 6,443	$ 567	9.65%	0.67
LVIS	$ 2,730	$ 2,994	$ 263	9.65%	0.67
LIS	$ 2,470	$ 2,709	$ 238	9.65%	0.67
Total	$ 136,735	$ 156,400	$ 19,665	14.38%	1.00
Other Revenues	$ 4,219	$ 4,234	15	0.37%	
Total System	$ 140,953	$ 160,634	$ 19,681	13.96%	

Further, the Company's percentage changes of total revenues associated with its proposed revenue apportionment by rate class are summarized in Table 4 below.

Table 4 - Proposed Change in Total Revenues by Rate

Rate Classes	Revenues at Current Rates	Revenues at Proposed Rates	Proposed Revenue Change	Percent Change	Increase Relative to System Increase
Residential	$ 198,187	$ 213,591	$ 15,404	7.77%	1.03
SCPA-LL	$ 12,829	$ 13,712	$ 883	6.88%	0.91
SCPA-UL	$ 14,779	$ 15,683	$ 905	6.12%	0.81
LCPA	$ 20,517	$ 21,859	$ 1,342	6.54%	0.87
NGV	$ 529	$ 550	$ 21	3.92%	0.52
SVIS	$ 807	$ 850	$ 43	5.30%	0.70
IVIS	$ 8,051	$ 8,618	$ 567	7.04%	0.94
LVIS	$ 2,960	$ 3,223	$ 263	8.90%	1.18
LIS	$ 2,646	$ 2,884	$ 238	9.01%	1.20
Total	$ 261,305	$ 280,970	$ 19,665	7.53%	1.00
Other Revenues	$ 4,219	$ 4,234	$ 15	0.37%	
Total System	$ 265,524	$ 285,204	$ 19,681	7.41%	

Please refer to the Direct Testimony of Courtney T. Mann (National Fuel Statement No. 14), who sponsors the Company's proposed rate design.

V. WNA MECHANISM

Q. What is the Company proposal regarding WNA in this proceeding?

A. National Fuel is requesting the Commission to approve the current pilot WNA mechanism, which is scheduled to expire in October 2028, as a permanent program. The WNA pilot was part of the 2022 Case settlement agreement approved by the Commission on June 15, 2023.

Q. What is the WNA and what is its purpose?

A. The WNA is a ratemaking mechanism that adjusts the delivery portion of customer bills so that they reflect usage under normal weather conditions rather than actual temperatures experienced during the heating season. Its primary purpose is to moderate the bill

impacts of unusually warm or cold weather, providing customers with greater stability while aligning billed revenues more closely with the Commission-approved revenue requirement.

Q. Does the Commission support the WNA?

A. Yes. In its most recent Final Order in the Columbia Gas of Pennsylvania ("Columbia") case, issued in December 2025, the Commission explicitly approved the continuation of Columbia's WNA mechanism "to allow it a reasonable opportunity to earn up to its Commission-authorized revenue requirement."[2]

Q. Please explain National Fuel's current WNA mechanism.

A. National Fuel's WNA mechanism functions as follows:

i) It adjusts the usage in customer bills based on deviations from normal weather, as measured by Heating Degree Days ("HDDs"), by comparing actual HDDs ("AHDDs") to normal HDDs ("NHDDs") based on a 15-year weather history.

ii) It includes a 3% deadband, meaning no adjustment is made unless the weather deviates by more than ±3% from normal. This prevents minor weather variations from triggering bill changes and ensures that adjustments occur only when there are material deviations.

iii) It applies to all Pennsylvania Natural Gas Residential and Commercial/Public Authority customers served by National Fuel.

[2] Pa. PUC v. Columbia Gas of Pa., Inc., Docket No. R-2024-3067174, Final Order at 301 (Dec. 4, 2025).

iv) It applies during the heating season (October through May). By excluding non-heating season usage and focusing on the weather-sensitive portion of consumption, the mechanism is carefully targeted and limited in scope.

Q. Is the Company proposing any changes to how the WNA mechanism currently operates?

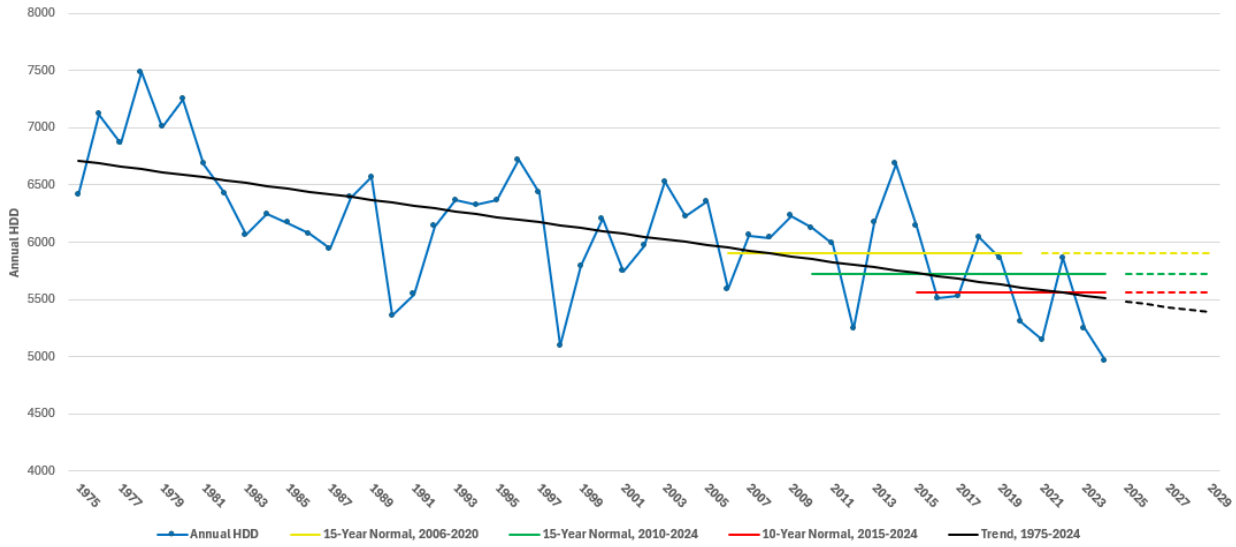
A. Yes. Company witness Cathryn E. Hilliard (National Fuel Statement No. 13) is proposing to establish NHDDs based on 10-year weather history.

Q. What is the significance of using 10-year weather history for establishing NHDDs.

A. Using a 10-year average reflects warmer recent weather. Therefore, the normalized billing determinants will be lower than those derived from the prior 15-year average that includes more cold years, as shown in Figure 1 below.[3] Assuming the warming trend continues, actual usage may be closer to, or even below, the 10-year baseline, triggering a smaller WNA surcharge or credit. However, no one (National Fuel included) can predict the number of HDDs in any given year with certainty; therefore, variations are still expected, and the WNA would still provide value to both customers and the Company.

[3] Based on National Oceanic and Atmospheric Administration (NOAA) data from the Erie, Pennsylvania station.

Figure 1 – Historic Annual HDD and Normalization Alternatives[4]



Q. Why is a WNA mechanism necessary for National Fuel's rate structure?

A. National Fuel's current rate design recovers significant fixed costs through volumetric charges. Weather-driven usage swings can cause under-recovery in warm winters and over-recovery in cold winters. The WNA stabilizes this to provide the Company a reasonable opportunity to recover its authorized revenue requirement while protecting customers from additional charges in colder than normal winters.

Q. Can you elaborate on the relationship between fixed costs and usage-based recovery in National Fuel's current rate design?

A. National Fuel's current rate design recovers a significant portion of its fixed costs, such

[4] Chart interpretation for grayscale / black-and-white printing:
• Annual HDD values are shown by the solid line with circular markers.
• The trend (1975–2024) is shown by a smooth solid line that slopes downward from left to right.
• The shorter horizontal reference lines near the right side of the chart are explained as follows:
- The highest horizontal line corresponds to the 15-year normal for 2006–2020.
- The middle horizontal line corresponds to the 15-year normal for 2010–2024.
- The lowest horizontal line corresponds to the 10-year normal for 2015–2024.

as infrastructure, maintenance, and administrative expenses, through volumetric charges based on customer usage. This means that when weather is warmer than normal and gas consumption declines, National Fuel under-recovers those fixed costs, even though they do not vary with usage. Conversely, colder-than-normal weather can lead to over-recovery. This mismatch creates volatility for both customers and the utility. The WNA mechanism helps address this by normalizing revenues to reflect normal weather conditions, ensuring that fixed costs are recovered more consistently with what was authorized by the Commission when it approved current rates.

Q. What portion of National Fuel's fixed costs is recovered through its current volumetric distribution charges?

A. As shown on National Fuel Exhibit E – Proof of Revenue, at current rates, approximately 63% of base rate distribution revenues for Residential is recovered through the volumetric distribution charge, leaving 37% recovered through fixed charges. For Rates SCPA, approximately 70% of base rate distribution revenue is recovered through the volumetric distribution charge, leaving 30% recovered through fixed charges. This clearly indicates that even though National Fuel's distribution costs are fixed, there is a risk of over- or under-recovery for the vast majority of costs, resulting in the need for the WNA.

Q. How does National Fuel's proposed WNA align with the factors the Commission may consider when evaluating this alternative ratemaking mechanism?

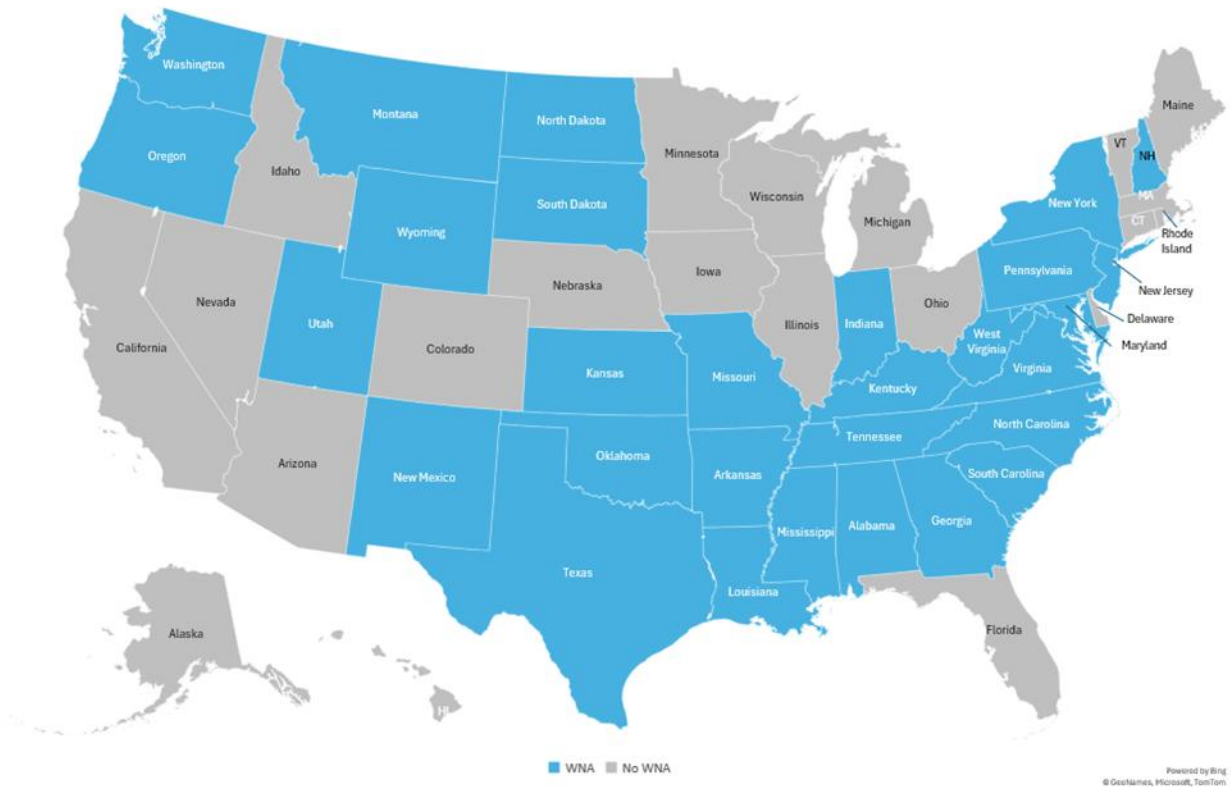
A. Exhibit JDT-3 details how National Fuel's proposed WNA aligns with each of the

fourteen items identified within the Statement of Policy as outlined by the Commission in the alternative rate making Docket No. M-2015-2518883. However, it is important to note that Statements of Policy language suggests that the Commission intends to consider these elements, but not all of them may be relevant or deemed required in order to determine whether a proposal is just and reasonable.

Q. Are WNAs common alternative ratemaking mechanisms in the utility industry?

A. Yes. WNA mechanisms are widely used across the United States to stabilize customer bills and utility revenues during abnormal weather conditions. The map below shows that 29 states with a total of 67 gas utilities have adopted similar mechanisms.

Figure 2 – WNA in the United States



VI. CONCLUSION

Q. Please summarize your primary conclusions.

A. The Company's proposed ACOSS method best reflects the cost causation of distribution mains by accounting for the fact that distribution mains are extended to new customers and are sized to meet peak demand requirements. As such, the Commission should rely on the Company's proposed ACOSS to guide revenue targets for each rate class. In addition, the revenue targets proposed by National Fuel reasonably balance the concepts of cost of service, current revenue contributions, and gradualism, while moving all classes closer to parity.

Q. Please summarize how implementing the proposed WNA mechanism results in fair and equitable ratemaking.

A. The Company's proposed WNA mechanism results in fair and equitable ratemaking due to the following:

- The WNA helps to break the link between the gas consumption of the Company's customers and its distribution revenue recovery, and better aligns the interests of National Fuel and its customers. The fixed costs embedded in National Fuel's volumetric rates for distribution service do not vary in the short-term with changes in temperature.
- The WNA addresses a factor beyond the Company's and customers' control, weather variability. This variability contributes to increased volatility in customers' bills, and increased volatility in the Company's recovery of costs.

- Customers receive greater stability in the non-gas portion of their utility bills, a benefit during the winter months when gas prices tend to be at their highest, and a particular benefit for low-income customers with high bills during the lengthy heating seasons in National Fuel's service areas.

For these reasons, I urge the Commission to approve the continuation of the Company's WNA a permanent ratemaking mechanism.

Q. Does this conclude your pre-filed direct testimony at this time?

A. Yes, it does.

John D. Taylor

MANAGING PARTNER

Mr. Taylor has experience with a wide range of costing, ratemaking, and regulatory activities for gas and electric utilities. He has testified numerous times on these and other issues for clients across North America. He has extensive experience with costing and pricing rates and services, regulatory planning and strategy development, revenue recovery and tracking mechanisms, merger and acquisitions analysis, new product and service development, affiliate transaction reviews, line extension policies, market assessments, litigation support, and organizational and operations reviews. He has testified on numerous occasions as an expert witness on costing and ratemaking related issues on behalf of utilities before federal, state, and provincial regulatory bodies and has extensive experience in evaluating and implementing innovative ratemaking approaches and rate design concepts.

He has also testified on return on equity, electric vehicle and battery storage programs, time-of-use rates, and the appropriate use of statistical analysis during audit testing. Mr. Taylor has led engagements relating to gas supply planning and the review of midstream transportation and storage capacity resources. He has worked as the market monitor for New England ISO's capacity market, supported the negotiation of PPAs, and supported feasibility and prudence studies of generation investments. He has also been involved in selling generating assets and distribution companies, supporting due diligence efforts, financial analyses, and regulatory approval processes.

Mr. Taylor received a master's degree in Economics from American University and holds a bachelor's degree in Environmental Economics from the University of North Carolina at Asheville.

EDUCATION

M.A., Economics, American University

B.A., Environmental Economics, University of North Carolina at Asheville

YEARS EXPERIENCE

18

RELEVANT EXPERTISE

Utility Costing and Pricing, Expert Witness Testimony, Transaction Facilitation, Revenue Requirements, Statistics, Valuation, Market Studies, Rate Case Management, New Product and Service Development, Strategic Business Planning, Marketing and Sales

His consulting career includes Managing Partner with Atrium Economics, LLC; Principal Consultant – Advisory & Planning with Black & Veatch Management Consulting, LLC; Senior Project Manager & Principal of Concentric Energy Advisors, Inc.; and CEO of Nova Data Testing, Inc. Mr. Taylor started his career working on Capitol Hill working with NGOs that were seeking Public Private Partnerships with the Federal Government, World Bank, and International Monetary Fund to pursue various projects in developing countries.

EXPERT WITNESS TESTIMONY PRESENTATION

UNITED STATES:

- California Superior Court of California
- Delaware Public Service Commission
- Florida Public Service Commission
- Federal Energy Regulatory Commission
- Illinois Commerce Commission
- Indiana Utility Regulatory Commission
- Maine Public Service Commission
- Massachusetts Department of Public Utilities
- Minnesota Public Utilities Commission
- New Hampshire Public Utilities Commission
- North Carolina Utilities Commission
- Oregon Public Utility Commission
- Ohio Public Utility Commission
- Pennsylvania Public Utility Commission
- Virginia State Corporation Commission
- Washington Utilities and Transportation Commission
- Public Service Commission of West Virginia

CANADA:

- Alberta Utilities Commission
- British Columbia Utilities Commission
- Ontario Energy Board

REPRESENTATIVE EXPERIENCE

RATE DESIGN AND REGULATORY PROCEEDINGS

Mr. Taylor has worked on dozens of electric and gas rate cases including the development of revenue requirements, class cost of service studies, and projects related to utility rate design issues. Specifically, he has:

- Lead expert and witness for class costs of service studies across North America and worked on dozens of other class cost of service and rate design projects for other lead witnesses.
- Developed WNA mechanism for a gas utility including back casting results and supporting expert witness testimony and exhibits.

- Developed revenue requirement model to comply with a new performance-based formula ratemaking process for a Midwest electric utility.
- Supported the development of time of use rates, demand rates, economic development rates, load retention rates, and line extension policies.
- Analyzed and summarized allocation methodology for a shared services company.
- Assessed the reasonableness of costs through various benchmarking efforts.
- Led the effort to collect and organize plant addition documentation for six Midwest utilities associated with the state commission's audit of rate base.
- Supported lead-lag analyses and testimonies.
- Analyzed customer usage profiles to support reclassification of rate classes for a gas utility.
- Helped conduct a marginal cost analysis to support rate design testimony.

LITIGATION SUPPORT AND EXPERT TESTIMONY

Mr. Taylor has testified in several cases on class cost of service studies and statistical audit methods. He has also supported numerous other expert testimonies. Specifically, he has:

- Filed testimony as an expert witness on allocated class cost of service studies for both electric and gas utilities.
- Filed testimony as an expert witness on the application of statistical analysis.
- Filed testimony before FERC on the rate of return for an Annual Transmission Revenue Requirement and participated in FERC settlement conferences.
- Part of two-person expert witness team that provided an expert report to the British Columbia Utilities Commission on the use of facilities for transportation balancing services for Fortis BC.
- Part of two-person expert witness team that provided an expert report on affiliate transactions and capitalized overhead allocations for Hydro One on three separate occasions.
- Sole expert for expert report on affiliate allocations for Alectra utilities, the second largest publicly owned electric utility in North America. This was conducted shortly after the merger of four distinct utilities.
- Sole expert for expert report on the allocation of overhead costs between transmission and distribution businesses for EPCOR.

TRANSACTION EXPERIENCE

Mr. Taylor has been involved with several generating asset transactions supporting both buy side and sell side analysis and due diligence. His work has included:

- Worked as buy side advisor for a large water utility in the mid-Atlantic region including supporting the review of revenue requirements, rates, and forecasts.
- Helped facilitate and manage processes for a nuclear plant auction by processing Q&A, collecting relevant documentation and managing the virtual data room for auction participants.
- Supported the auction process for steam and chilled water distribution and generation assets in the Midwest.
- Supported the development of a financial model to ascertain the net present value of several competing wholesale power purchase agreements and guided the client with a decision matrix for the qualitative aspects of the offers.
- Provided research on comparable transactions, previous mergers and acquisitions, and potential transaction opportunities for several clients.

FINANCIAL ANALYSIS AND MARKET RESEARCH

Other financial analysis and market research Mr. Taylor has conducted include:

- Estimated the rate impact and costs associated with moving California energy market to 100% renewable.
- Assessed the consequences of a divestiture on the cost-of-service model for a New England gas distribution company.
- Developed LNG market studies for two separate utilities and two separate competitive market participants.
- Modeling alternative mechanisms for the allocation of overhead costs to a nuclear plant.

NATIONAL FUEL EXHIBIT JDT-2

PROPOSED REVENUE TARGETS BY CLASS

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ending October 31, 2027
EXHIBIT JDT-2 – PROPOSED REVENUE TARGETS BY CLASS
($ in thousands)

Line No.	Description	Total System	Total Check	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
1	**Total Rate Base**	571,582	-	446,527	25,330	27,719	40,971	974	1,072	16,029	6,028	6,930
2	Gas Service Revenue	136,735		97,367	6,819	6,989	13,908	131	444	5,876	2,730	2,470
3	Other Revenues	4,219		3,512	173	191	195	7	9	76	26	29
4	**Total Revenue**	**$ 140,953**	-	**$ 100,879**	**$ 6,993**	**$ 7,179**	**$ 14,103**	**$ 138**	**$ 453**	**$ 5,953**	**$ 2,756**	**$ 2,499**
5	**Current Revenue to Cost Ratio**	0.88		0.78	0.93	0.96	1.54	0.66	1.38	1.67	2.10	1.73
6	**Current Parity Ratio**	1.00		0.89	1.06	1.09	1.75	0.75	1.57	1.90	2.39	1.97
7	**Scenario A: Revenues at Equalized Rates of Return**											
8	Revenue Increase/(Decrease)	$ 19,665	-	$ 28,728	$ 511	$ 298	$ (4,936)	$ 72	$ (125)	$ (2,385)	$ (1,444)	$ (1,054)
9	Total Rate Revenue at Equalized Rates of Return	156,400	-	126,095	7,330	7,287	8,972	203	319	3,491	1,286	1,416
10	Other Revenues	4,234	-	3,524	174	191	196	7	9	77	26	29
11	**Total Revenue at Equalized Rates of Return**	**$ 160,634**	-	**$ 129,620**	**$ 7,504**	**$ 7,478**	**$ 9,168**	**$ 210**	**$ 328**	**$ 3,568**	**$ 1,312**	**$ 1,445**
12	**% Increase of Total Revenues**	13.95%		28.48%	7.30%	4.15%	-35.00%	51.96%	-27.63%	-40.06%	-52.39%	-42.17%
13	**% Increase of Margin Revenues**	14.38%		29.51%	7.49%	4.27%	-35.49%	54.73%	-28.20%	-40.58%	-52.89%	-42.67%
14	**Resulting Revenue to Cost Ratio**	1.00		1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
15	**Resulting Parity Ratio**	1.00		1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
16	**Scenario B: Equal Percentage Increase on Gas Service Revenue**											
17	Percent Increase	14.38%		14.38%	14.38%	14.38%	14.38%	14.38%	14.38%	14.38%	14.38%	14.38%
18	Revenue Increase/(Decrease)	$ 19,665	-	$ 14,003	$ 981	$ 1,005	$ 2,000	$ 19	$ 64	$ 845	$ 393	$ 355
19	Total Rate Revenue	156,400	-	111,370	7,800	7,994	15,908	150	508	6,721	3,123	2,826
20	Other Revenues	4,234	-	3,524	174	191	196	7	9	77	26	29
21	**Total Revenue at Equal Percentage Increase**	**$ 160,634**		**$ 114,895**	**$ 7,974**	**$ 8,185**	**$ 16,104**	**$ 157**	**$ 517**	**$ 6,798**	**$ 3,149**	**$ 2,855**
22	**Resulting Revenue to Cost Ratio**	1.00		0.89	1.06	1.09	1.76	0.75	1.58	1.91	2.40	1.98
23	**Resulting Parity Ratio**	1.00		0.89	1.06	1.09	1.76	0.75	1.58	1.91	2.40	1.98
24	**Proposed Scenario C: Moderated based on Current Parity Ratio**											
25	Multiple of System Increase			1.10	0.90	0.90	0.67	1.10	0.67	0.67	0.67	0.67
26	Percent Increase			15.82%	12.94%	12.94%	9.65%	15.82%	9.65%	9.65%	9.65%	9.65%
27	Revenue Increase/(Decrease)	19,665	-	15,404	883	905	1,342	21	43	567	263	238
28	Total Rate Revenue	156,400	-	112,771	7,702	7,893	15,249	152	487	6,443	2,994	2,709
29	Other Revenues	4,234	-	3,524	174	191	196	7	9	77	26	29
30	**Total Revenue at Proposed**	160,634		116,295	7,876	8,085	15,446	159	496	6,520	3,020	2,738
31	**Base Rate Margin at Proposed**	$ 156,400		$ 112,771	$ 7,702	$ 7,893	$ 15,249	$ 152	$ 487	$ 6,443	$ 2,994	$ 2,709
32	Percent Increase on Base Rate Margin	14.38%		15.82%	12.94%	12.94%	9.65%	15.82%	9.65%	9.65%	9.65%	9.65%
33	**Proposed Revenue to Cost Ratio**	1.00		0.90	1.05	1.08	1.68	0.76	1.51	1.83	2.30	1.89
34	**Proposed Parity Ratio**	1.00		0.90	1.05	1.08	1.68	0.76	1.51	1.83	2.30	1.89

NATIONAL FUEL EXHIBIT JDT-3

WNA MECHANISMS

WNA Mechanism Policy Factors

#	Statement of Policy	Company's Response
1	How the ratemaking mechanism and rate design align revenues with cost causation principles as to both fixed and variable costs.	National Fuel Gas's WNA is designed to recover distribution revenues needed to satisfy the cost-of-service requirement determined in this proceeding, while mitigating the variance between actual and projected distribution revenues due to weather. The Company recovers a significant portion of fixed costs through volumetric rates. These fixed costs do not vary with the amount of gas delivered to customers and are composed of fixed operation and maintenance expenses, administrative and general expenses, depreciation, certain taxes, a portion of working capital requirements, and return on investment. These costs also do not vary in the short-term with changes in temperature. In the absence of a rate design that affords the Company the opportunity to recover all fixed costs in a fixed monthly charge, the WNA mechanism better aligns distribution revenues with cost causation principles.
2	How the ratemaking mechanism and rate design impact the fixed utility's capacity utilization.	The WNA mechanism indirectly supports efficient capacity utilization by stabilizing the recovery of fixed distribution costs, which are incurred to maintain National Fuel Gas's infrastructure and capacity to serve customers regardless of fluctuations in gas usage. Since these fixed costs do not change with short-term usage variations, the WNA ensures that the Company can continue investing in the infrastructure necessary to meet peak demand and long-term capacity needs and be compensated for these investments. By supporting revenue stability, the WNA reduces under-recovery risks during periods of lower gas usage, ensuring that the revenues collected align with customers' continued reliance on the utility's fixed assets that provide peak service.
3	Whether the ratemaking mechanism and rate design reflect the level of demand associated with the customer's anticipated consumption levels.	Customer specific usage factors corresponding to their individual demand is continually updated through the WNA formula and reflects the level of demand associated with the customer's anticipated consumption levels. In this proceeding, the Company is also proposing to set Normal Heating Degree Days using a 10-year average rather than a 15-year average, which more accurately captures recent warming trends. Using a more current weather baseline ensures that the WNA formula better aligns normalized usage

WNA Mechanism Policy Factors

#	Statement of Policy	Company's Response
		with customers' anticipated consumption levels under today's climate conditions.
4	How the ratemaking mechanism and rate design limit or eliminate interclass and intraclass cost shifting.	National Fuel Gas's WNA is applied on a customer-specific basis and is designed to be revenue-neutral within each customer class, such that it does not create or exacerbate cross-subsidization either within or across classes.
5	How the ratemaking mechanism and rate design limit or eliminate disincentives for the promotion of efficiency programs.	The Company's WNA only addresses variations due to weather and does not affect customers' ability to pursue energy efficiency measures. Further, the Company continues and will continue to promote the use of energy efficiency measures to its customers as the WNA removes the financial disincentive for National Fuel Gas to promote energy efficiency.
6	How the ratemaking mechanism and rate design impact customer incentives to employ efficiency measures and distributed energy resources.	Customers retain strong incentives to reduce usage because the commodity and other charges remain volumetric. The proposed WNA does not eliminate these price signals, so lower usage still results in lower bills.
7	How the ratemaking mechanism and rate design impact low-income customers and support consumer assistance programs.	Under the proposed WNA mechanism, customers who are currently enrolled to pay their bills based on a percentage of their household income see little to no impact to their bills under the WNA mechanism.
8	How the ratemaking mechanism and rate design impact customer rate stability principles.	The American Gas Association Gas Rate Fundamentals book (Pages 152 – 156) states: "The goal of stability recognizes historical relationships among customers in terms of the proportion of system costs each customer group bears. Stability leads to a policy of gradualism in rate changes if substantial increases (or decreases) are called for in the context of a single rate case. Changes in gas utility pricing policy should be imposed gradually so that customers can

WNA Mechanism Policy Factors

#	Statement of Policy	Company's Response
		adjust and any adverse impacts on the customers' operation are minimized." The WNA mechanism provides customers with more stable annual bills and directly mitigates volatility in their monthly costs. Customers would pay for the costs assigned to the volumetric base rate in the most recent rate case and customers would not pay more or less than that amount solely because the actual weather for the month the customers are billed is different than the weather used to determine the rate design of the volumetric base rate.
9	How weather impacts utility revenue under the ratemaking mechanism and rate design.	The Company's WNA adjusts customers' bills due to variations from normal weather during the heating season months (October through May), and it only mitigates the revenue effect of weather on the original rate design of the volumetric base rate. Without it, the Company is deprived of the opportunity to recover the Commission-approved distribution revenue requirement for the applicable classes during times when warmer than normal weather occurs. Moreover, the absence of a WNA places the Company in a position of receiving a higher amount of revenues from customers when the weather is colder than normal. The WNA avoids both scenarios by minimizing the impact of weather on the Company's revenues and customers' bills.
10	How the ratemaking mechanism and rate design impact the frequency of rate case filings and affect regulatory lag.	The WNA does not impact the Company's rate case frequency nor it effects regulatory lag.
11	If or how the ratemaking mechanism and rate design interact with other revenue sources (e.g., surcharges).	National Fuel Gas's WNA is solely focused on recovering costs that are part of the base revenue requirement and does not interact with other revenue sources, such as Section 1307 automatic adjustment surcharges, restructuring riders, or system improvement charges under Section 1353.
12	Whether the alternative ratemaking mechanism and	National Fuel Gas's WNA includes several consumer protections to ensure fairness and transparency, as follows:

WNA Mechanism Policy Factors

#	Statement of Policy	Company's Response
	rate design include appropriate consumer protections.	a. No Over-Recovery of Revenue: The WNA mechanism results in an adjusted bill that reflects the revenues that would be recovered under normal weather, i.e., the same normal weather used to set rates. The Company does not recover additional distribution revenues due to colder than average temperatures that result in higher-than-normal usage from customers. This is ensured by limiting the mechanism to the heating season and having a deadband. b. No Cross-Subsidization: The WNA is customer-specific. c. Regulatory Oversight: The WNA is subject to Commission review and regulatory reporting requirements to ensure compliance with approved revenue stabilization objectives and to protect consumers from unintended rate impacts. d. Customer Transparency: National Fuel Gas provides clear bill disclosures and customer education regarding WNA adjustments, ensuring consumers understand how the mechanism works and how it impacts their bills.
13	Whether the alternative ratemaking mechanism and rate design are understandable to consumers.	The WNA is not a new concept to the regulated utility industry and similar versions have been successfully implemented by other Pennsylvania natural gas distribution companies. The WNA tariff provides detailed information to the customer of how the mechanism works and the adjustments are displayed separately on bills, ensuring full transparency. The Company has also made available Frequently Asked Questions (FAQs) on its website https://www.nationalfuel.com/utility/weather-normalization-adjustment-pa-home-biz/ Additionally, the Company sent customers a WNA reminder and plain language insert September 2025, ahead of the winter heating season.
14	How the ratemaking mechanism and rate design will support improvements in utility reliability.	The proposed WNA targets the revenue requirement that would have been already subject to scrutiny and approved by the Commission, meaning that its prudency and reasonableness would have been reviewed and deemed appropriate to support reliability driven

WNA Mechanism Policy Factors

#	Statement of Policy	Company's Response
		initiatives. The proposed WNA would help minimize the volatility of the recovery of these costs.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 19-R

Rebuttal Testimony of
John D. Taylor

Topics Addressed:
Cost of Service Study
Revenue Allocation
Rate Design – Customer Charge
Weather Normalization Adjustment

Dated: May 12, 2026

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is John D. Taylor and my business address is 10 Hospital Center Commons, Suite 400, Hilton Head Island, South Carolina 29926.

Q. On whose behalf are you appearing in this proceeding?

A. I am appearing on behalf of National Fuel Gas Distribution Corporation's ("NFGDC") Pennsylvania Division ("National Fuel" or the "Company")[1].

Q. By whom are you employed and in what capacity?

A. I am employed by Atrium Economics, LLC ("Atrium") as a Chief Executive Officer ("CEO").

Q. Did you previously submit testimony in this proceeding on behalf of National Fuel?

A. Yes. I submitted my direct testimony, National Fuel Statement No. 19, on January 28, 2026.

Q. Please summarize your rebuttal testimony.

A. My rebuttal testimony responds to certain portions of the following direct testimony submitted by other parties. The areas addressed include the following – with reference to the direct testimony of the other parties addressed:

[1] Other parties use the term NFGDC to refer to National Fuel Gas Distribution Corporation's Pennsylvania Division. I have not altered instances when other parties' testimonies use this term but have relied on the term 'National Fuel' to reflect National Fuel Gas Distribution Corporation's Pennsylvania Division.

II. Revenue Allocation

- Office of Consumer Advocate ("OCA") Statement No. 1 - direct testimony of Michael Deupree ("OCA witness Deupree" or "Mr. Deupree");
- Bureau of Investigation and Enforcement ("I&E") Statement No. 3 - direct testimony of Ethan H. Cline ("I&E witness Cline" or "Mr. Cline"); and
- Office of Small Business Advocate ("OSBA") Statement No. 1 – direct testimony of Justin B. Farr ("OSBA witness Farr").

III. Allocated Cost of Service Study Methodology

- OCA witness Deupree; and
- I&E witness Cline.

IV. Rate Design – Customer Charge

- OCA witness Deupree;
- I&E witness Cline; and
- The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA") Statement No. 1 – direct testimony of Harry S. Geller ("CAUSE-PA witness Geller").
- The Pennsylvania Weatherization Providers' Task Force ("PWPTF") Statement No. 1 – direct testimony of Jennifer Warabak ("PWPTF witness Warabak").

V. Weather Normalization Adjustment

- OCA witness Deupree;
- I&E witness Cline; and
- CAUSE-PA witness Geller.

Q. What exhibits are you sponsoring with your rebuttal testimony?

A. I am sponsoring two rebuttal exhibits, listed below:

- Rebuttal Exhibit JDT-19-R-A – Peak & Average ACOSS Model; and
- Rebuttal Exhibit JDT-19-R-B – Customer Component of Distribution Survey.

Q. Please summarize your primary conclusions in this proceeding.

A. National Fuel requests that the Commission approve the Company's filed proposals because they reasonably reflect cost causation principles while appropriately considering customer impacts. Specifically:

i. The Company's revenue allocation approach appropriately uses the results of the Company's fully Allocated Cost of Service Study ("ACOSS") as the primary guide while applying gradualism to moderate customer bill impacts and moving class revenues toward cost-based parity in a measured manner.

ii. The Company's proposed increase in the Residential monthly customer charge from $14.00 to $19.00 is a measured step toward better alignment of fixed charges with customer-related costs and improves bill stability without eliminating meaningful volumetric price signals.

iii. Making the existing Weather Normalization Adjustment ("WNA") mechanism permanent will help reduce weather-driven volatility in both customer bills and the Company's recovery of Commission-authorized distribution revenues, and the use of a 10-year normal Heating Degree Day ("HDD") average reasonably reflects more recent weather patterns.

iv. The proposed modifications to the WNA presented by intervening parties should be denied as they reduce the effectiveness of the WNA and provide no value to customers.

II. REVENUE ALLOCATION

Q. Please summarize the Company's proposed revenue apportionment and the positions taken by the intervening parties on this issue.

A. As discussed in my Direct Testimony, the Company's proposed revenue apportionment allocates the requested base rate increase among customer classes using the results of the Company's ACOSS as the primary guide, while also considering gradualism and customer bill impacts. Under this approach, customer classes with revenue levels below their indicated cost of service are assigned somewhat above-average increases, while customer classes with revenues above their indicated cost levels are assigned below-average increases, thereby moving class revenues closer to cost-based parity in a measured and gradual manner.[2]

With respect to the intervening parties, OSBA witness Farr generally supports the Company's proposed revenue apportionment and the use of the Company's ACOSS as a reasonable basis to guide class revenue responsibility.[3] In contrast, OCA witness Deupree and I&E witness Cline recommend alternative revenue apportionment proposals that are based on their respective alternative ACOSS results. Because those witnesses advocate different methods for classifying and allocating certain distribution costs, particularly distribution mains, their proposed revenue allocations differ from the Company's proposal

[2] National Fuel Statement No. 19 at 20-23.
[3] OSBA Statement No. 1 at 17.

in the extent to which the requested increase is assigned among the customer classes.[4]

Q. Have you compared the revenue apportionment outcomes proposed by various parties?

A. Yes. As presented in **Table 1** below, I compared the percentage of total increase assigned to each class across the Company and other parties' proposals.

Table 1 - Comparison of Revenue Apportionment by Class Among Parties

Rate Classes	National Fuel	OCA	OSBA	I&E	Average OCA, OSBA, I&E
Residential Service	78.33%	71.00%	83.13%	66.36%	**73.50%**
Small Commercial & PA Service (LE 250)	4.49%	4.24%	4.15%	4.07%	**4.15%**
Small Commercial & PA Service (GT 250)	4.60%	5.88%	4.26%	7.12%	**5.75%**
Large Comm PA Service	6.82%	10.14%	4.57%	11.18%	**8.63%**
NGV	0.11%	0.11%	0.11%	0.13%	**0.12%**
SVIS	0.22%	0.28%	0.15%	0.00%	**0.14%**
IVIS	2.88%	4.29%	1.93%	5.85%	**4.02%**
LVIS	1.34%	1.99%	0.90%	2.75%	**1.88%**
LIS	1.21%	2.08%	0.81%	2.54%	**1.81%**
Total	100.00%	100.00%	100.00%	100.00%	**100.00%**

Q. What explains the differences in revenue apportionment among the parties?

A. The differences in revenue apportionment among the parties are driven by two primary factors. First, each party relies on its own cost-of-service study results, which reflect differing assumptions and methodologies. Second, and equally important, each party applies judgment in determining how to translate those results into revenue targets for each class.

[4] OCA Statement No. 1 at 6 and I&E Statement No. 3 at 11-13.

No party in this proceeding proposes to move rate classes fully to cost-of-service parity in a single step. Instead, each party applies gradualism to moderate rate impacts and determine how far to move each class toward cost-based rates. As a result, the final revenue apportionment reflects both the underlying ACOSS results and each party's judgment regarding rate impacts and policy considerations.

Q. How should the Commission consider these differences when evaluating the various proposals?

A. These differences demonstrate that revenue apportionment is not a mechanical outcome of any single cost-of-service study. Rather, it reflects a combination of analytical results and informed judgment applied by each party. The primary issue is how to reasonably apportion the approved revenue requirement among customer classes, balancing cost-of-service principles with gradualism and rate stability. As I described in my direct testimony, a cost of service study is a guide, providing directional insight into cost responsibility, but revenue allocation ultimately requires judgment, including consideration of gradualism, rate impacts, and policy objectives.

Q. Do you agree with the alternative revenue apportionment proposals presented by OCA witness Deupree and I&E witness Cline?

A. No. I do not agree with the alternative revenue apportionment proposals presented by OCA witness Deupree and I&E witness Cline because each proposal is premised on alternative ACOSS results that the Company does not support. Both OCA and I&E recommend changes to the Company's underlying cost allocation methodology, as discussed below in

this testimony, and those changes alter the resulting class revenue-to-cost relationships used to guide revenue apportionment.

Because revenue apportionment is inherently dependent upon the ACOSS used to measure class cost responsibility, alternative ACOSS assumptions will necessarily produce different allocations of the requested increase among customer classes. In contrast, the Company's proposed revenue apportionment is based on the ACOSS methodology sponsored in my Direct Testimony, which reasonably reflects cost causation and provides an appropriate basis for measured movement toward improved class revenue parity. Therefore, the Company continues to support its proposed revenue apportionment because it is based on a reasonable cost-of-service foundation and appropriately balances the ratemaking objectives of cost causation, gradualism, and customer impact.

III. ALLOCATED COST OF SERVICE STUDY METHODOLOGY

(1) Summary of Company and Other Parties' Positions

Q. Please summarize the fully ACOSS presented in your direct testimony.

A. My direct testimony presents the purpose and principles of cost allocation and National Fuel's preferred ACOSS using the customer demand method for allocating mains and a peak and average ("P&A") method, for informational and comparison purposes, which allocates distribution mains using what is historically referred to as the "Seaboard" method, which involves a 50% weighting of peak contribution by the class and 50% weighting of annual throughput. As compared to the customer demand method, the allocation of distribution mains using the Seaboard method reduces the revenue

requirement of the Residential class by $17.5 million representing a 13.9% decrease. There is also a corresponding increase in the commercial and industrial classes. As is expected, using the Seaboard method increases the allocation of costs to those classes with higher load factors and large volumes of annual throughput.[5]

Q. Please summarize the positions of OCA and I&E relating to the Company's cost allocation method for distribution mains.

A. Mr. Deupree and Mr. Cline take issue with the allocation of distribution mains in the Company's proposed ACOSS:

- Mr. Deupree asserts that the class cost of service study allocating distribution mains plant investment and related costs based on the system demand with customer component presented by National Fuel in this proceeding, determined from the zero-intercept study, is "...fundamentally flawed and provide little to no value in setting just and reasonable rates."[6] Mr. Deupree presents several arguments supporting the allocation of mains using P&A methodology.
- Mr. Cline also recommends adopting a P&A mains allocation methodology to replace the Company's customer-demand methodology.[7] He asserts the Company's "customer-demand allocation proposal is inconsistent with long-standing Commission precedent"[8] and that the Company "has not provided any reason to support its proposal"[9] reversing this precedent.

[5] NFGDC Statement No. 19 at page 20.
[6] OCA Statement No. 1 at 5.
[7] I&E Statement No. 3 at 10.
[8] *Id*. at 9.
[9] *Id*. at 10.

- In contrast, OSBA witness Farr states, "Overall, I find that National Fuel's cost allocation methods, as described by Mr. Taylor, align with cost causation principles. Accordingly, I do not recommend any changes to the Company's cost allocation methods in this case."[10]

Q. Please discuss the cost allocation concepts relied upon in conducting a gas utility's cost of service study and how those concepts relate to the various deficiencies in Mr. Deupree's cost allocation proposal.

A. It is a practical reality of utility regulation that common costs (e.g., the cost of distribution mains) be allocated among jurisdictions, classes of service, rate schedules, or customers within rate schedules. The development of allocation factors uses principles of both economics and engineering to develop allocation factors appropriate for different elements of costs. The result is a cost of service study which provides a reasonable basis for regulators to establish revenue requirements for each class of service and to guide rate design decisions. The key to a reasonable cost allocation is a thorough understanding of cost causation, a principle that I believe Mr. Deupree endorses but fails to follow fully.

(2) Zero-Intercept Method/Customer Demand Methodology

Q. Mr. Deupree recommends rejecting the Company's zero-intercept study/customer demand methodology and replacing it with the P&A method to classify distribution mains.[11] Do you agree with this recommendation?

[10] OSBA Statement No. 1 at 16
[11] OCA Statement No. 1 at 62.

A. No. I do not. Mr. Deupree's recommendation conflates cost recovery with cost causation. While annual throughput influences rate recovery, it does not drive the investment decisions that determine the design, size, or extent of distribution mains. Distribution mains are built to connect customers to the system and to provide sufficient capacity to meet coincident peak-day demand. Replacing the customer demand methodology with a P&A approach would move cost allocation away from these cost-causative factors. Indeed, Mr. Deupree agrees the key issue facing cost of service studies is "whether the selected methodology appropriately reflects cost causation—that is, whether it aligns the allocation of costs with the way the natural gas distribution system is actually designed, constructed, and operated to serve customers."[12] As noted above, Mr. Cline also recommends adopting a P&A mains allocation methodology to replace the Company's customer-demand methodology.

Q. Are there other recognized authorities that agree it is proper to allocate a portion of a gas utility's distribution mains on a customer basis?

A. Yes. In his widely utilized text, The Regulation of Public Utilities,[13] Dr. Charles F. Phillips, Jr. states that "customer costs vary with the number of customers. These costs include a portion of the distribution system, local connection facilities, metering equipment, billing and accounting. Customer costs, moreover, are independent of consumption." Gas Rate Fundamentals, published by the American Gas Association ("AGA"), states that customer-related costs are primarily distribution and customer accounting costs. In conjunction with its discussion of various utility cost components, it

[12] OCA Statement No. 1 at 47.
[13] The Regulation of Public Utilities, Charles F. Phillips, Jr., Public Utility Reports, 1984.

is further stated that "the closer a plant item (e.g., a meter and service line) is located to a customer, the more that particular item is related to the specific requirements of that customer. Thus, the customer component of distribution costs reflects the theoretical distribution system that would be needed to serve customers at nominal or minimum load conditions."[14] Additionally, in discussing the various functions and cost-causative components attributable to the operations of a gas distribution utility, it is stated that for distribution costs, the prime cost causation component is one that is customer-related.[15]

Q. On pages 56 and 57 of his direct testimony[16], Mr. Deupree presents selected statements from a recognized authority that he contends supports his conclusion that it is improper to allocate a portion of a gas utility's distribution mains on a customer basis. How do you respond?

A. The recognized authority cited by Mr. Deupree, Professor James Bonbright, makes other statements that strongly suggest the opposite view that the recognition of a customer component of distribution mains for a gas utility is appropriate.

In Principles of Public Utility Rates,[17] Professor Bonbright notes that the use of a two-part rate structure is based on the assumption that one part of the total cost of a utility's business is a function of the output or energy of the system, whereas another part is a function of plant capacity and hence of all costs related to this capacity. Professor Bonbright goes on to point out, however, that "this two-fold distinction overlooks the fact

[14] Gas Rate Fundamentals, American Gas Association Rate Committee, Fourth Edition 1987 at page 136.
[15] *Id*. at 137.
[16] OCA Statement No. 1 at 56-57.
[17] Principles of Public Utility Rates, Second Editions, James C. Bonbright, Albert L. Danielson, David R. Kamerschen, Public Utility Reports, Inc., 1988

that a material part of the operation and capital costs of a utility business is more directly and closely related to the number of customers than to energy consumption on the one hand or maximum kilowatt demand on the other hand." (Emphasis added).[18]

In addition, in this section dealing with the criteria of a sound rate structure, Professor Bonbright states that,

> "customer costs incurred to serve a customer are invariant with respect to consumption. They are the costs incurred to serve a customer even if the customer does not use the service at all. The most obvious examples of these customer costs are the expenses associated with local connection facilities, metering equipment and meter reading, billing and accounting, and a portion of the distribution system."[19] (emphasis added)

Finally, on page 492, Professor Bonbright states that "in actual practice the vast majority of utilities utilized some form of minimum system to classify costs, which is in line with FERC accounts."

Q. Mr. Deupree criticizes zero-intercept studies as relying on hypothetical constructs[20]. Is that criticism valid?

A. No. This mischaracterizes the methodology. A zero-intercept study does not assume a fictional system but instead uses observed relationships between pipe size and cost to distinguish customer-related investment from capacity-related investment. This approach is grounded in engineering principles and reflects how utilities actually design and build distribution systems.

[18] *Id*. at page 401.
[19] *Id*. at page 401.
[20] OCA Statement No. 1 at pages 52 and 54.

Q. Is allocating a portion of mains costs based on customer count inconsistent with cost causation?

A. No. The Company does not allocate mains costs solely on customer count. It uses a composite customer-demand approach that captures both customer-driven system expansion and demand-driven capacity requirements. Ignoring the customer-related component understates the costs associated with maintaining an integrated distribution grid.

Q. Through his recommendation of the P&A cost allocation method for distribution mains[21], Mr. Deupree argues that distribution mains serve customers throughout the year and therefore their costs should be allocated in part based on average usage. Why is this reasoning flawed?

A. Because system use is not the same as cost causation. Once sufficient mains capacity is installed to meet design-day conditions, additional gas flowing through those mains (throughput) during non-peak periods does not increase costs. The ability to serve customers throughout the year exists only because the system is designed to meet peak demand. Treating average throughput as a cost driver reverses this causal relationship. Annual throughput is a result of system design, system design is driven by the need to connect customers and serve their peak demand, as such annual throughput is not a driver of investment.

[21] *Id*. at page 62.

Q. How does the customer demand method better reflect cost causation for distribution mains than a P&A methodology?

A. The customer demand method recognizes the two factors that actually cause investment in distribution mains: the need to connect customers to an integrated system and the need to size that system to safely and reliably meet coincident peak-day demand. The customer demand method uses a customer component to reflect grid extension and a demand component to reflect capacity requirements. The P&A method collapses these distinct drivers into a usage proxy that does not correspond to how mains are engineered or constructed.

(3) Peak & Average Methodology

Q. Have other Commissions recently reviewed the appropriateness of the Seaboard method compared to the customer demand method?

A. Yes, the Public Service Commission of West Virginia has relied on the Seaboard method over the past several decades. However, in Dominion Energy West Virginia's 2020 rate case, they reviewed arguments relating to the appropriateness of using the Seaboard method as compared to the customer demand method. In their final order, they found the movement away from the Seaboard method appropriate.

> "The Commission finds that a movement away from the 2008 methodology [Seaboard] is appropriate. However, in the interest of moderation and to allow for future review of the effects of a shift in CCOSS methodology, we will not adopt Hope's alternative methodology [customer demand method] totally at this time. Instead, we will use, as an initial allocation, an average of the two methods."[22]

[22] Public Service Commission of West Virginia, Final Order for Dominion Energy West Virginia Case No. 20-0746-6-42T, (filed July 27, 2021), page 59

Q. Are there other insights relating to the appropriateness of the Seaboard method in allocating mains?

A. Yes. As stated in my direct testimony, the Seaboard method (and later the United method discussed below) was historically utilized by the FERC (and its predecessor, the Federal Power Commission ("FPC"). The FERC and FPC have made cost classification decisions, at various points in time, with less regard to cost causation principles and with primary emphasis on addressing the implications of a set of facts and conditions in energy markets on gas pipeline rate design. Rate design methods at FERC have changed and evolved over the years to achieve various policy objectives while satisfying the fundamental tenants of rate design theory.

Q. Does the FERC still rely on the Seaboard method for the allocation of costs?

A. No. In 1992, with the issuance of Order No. 636, the FERC adopted the Straight Fixed-Variable method (SFV). Under SFV, all fixed costs are classified to the demand component, and all variable costs are classified to the commodity component. The FERC reasoned that a change from a modified fixed variable or MFV method was necessary because each pipeline, depending on its capital structure, had different levels of fixed costs in the usage (commodity) rates, thus hindering gas-on-gas competition in the marketplace. The purpose of SFV was to promote the development of a competitive market for natural gas at the wellhead by eliminating transportation rate differentials. FERC Order No. 636-A, FERC indicated:

> "… the Commission believes that fixed costs in pipeline usage charges inhibit the sending of accurate price signals ″at the margin″ because the inclusion of those costs in the delivered price of day-to-day gas purchases does

not allow producers and consumers to see the marginal price of gas that over the long run is more likely to produce the Commission's goal of an efficient national gas market."[23]

The SFV method has endured to this day. In my opinion, Mr. Deupree is using the Seaboard method much as the FPC used the Seaboard method nearly 70 years ago; that is, to provide a rationale for his rate apportionment and rate design objectives.

Q. Mr. Deupree suggests that the P&A methodology better reflects differences in load factors across customer classes by resulting in a "more balanced allocation of costs."[24] Should load factor be a primary driver of distribution mains allocation?

A. No. Load factor is typically defined as a customer's (or class's) average usage over a period divided by its maximum (peak) demand during that same period. Load factor measures how customers use available capacity, not how much capacity they require. Customers with higher load factors often impose the same or lower peak capacity requirements than lower load-factor customers. Allocating distribution mains costs based on load factor penalizes efficient customers and violates cost causation principles. Indeed, Mr. Deupree concedes "(load factor) should not be the primary driver of cost allocation or rate design decisions."[25]

[23] Federal Energy Regulatory Commission, Docket Nos. RM91-11-001 and RM87-34-065, Order No. 636 (Apr. 9, 1992).
[24] OCA Statement No. 1 at 47-48.
[25] *Id*. at 49.

Q. Does the P&A method improperly merge cost allocation with rate design considerations?

A. Yes. P&A is frequently justified because it produces preferred rate outcomes rather than because it reflects cost causation. Whether residential rates should be mitigated is a rate design question. Cost allocation should first identify cost responsibility as accurately as possible, independent of rate impacts.

Q. Do Commission precedents approving the P&A method in prior cases establish that P&A is a cost-causative methodology or otherwise superior to alternative approaches?

A. No. Commission precedent reflects prior outcomes and does not, by itself, transform a methodology into a cost-causative allocator or establish that it is superior. While some commissions have accepted P&A, often for rate-impact or gradualism reasons, other jurisdictions have recognized minimum-system and zero-intercept techniques and have approved customer/demand-based classification of mains as more consistent with cost causation. Ultimately, cost allocation should document how costs are incurred; policy considerations and rate impacts are appropriately addressed separately through rate design.

Q. How do you respond to Mr. Cline's citation of the Commission's acceptance of the P&A approach in other rate cases[26]?

A. Mr. Cline cited the Commission by referring to the Columbia Gas Company of Pennsylvania, Inc. ("Columbia") rate case (Docket No. R-2025-3053499) and accepted P&A methodology. Mr. Cline is correct that the Commission has supported P&A before. It is also correct that other jurisdictions have also supported P&A and have no customer component of mains. However, others have agreed with National Fuel's approach of classifying mains to both customer and demand. Typically, when reading through the orders disallowing a customer component or approving the P&A method, it appears that the stated rationale is either premised upon the 'annual gas delivery function' as the reason for the utility's existence or confusion of cost allocation concepts with rate design (i.e., allowing the method of recovering costs to impact the method of allocating those costs). It is my opinion, and that of other experts and commissions, that cost allocation should be solely based on cost causation and not take into account the method of recovering those costs nor the impact on class rates; those are both issues of rate design. The desire to utilize cost causation with no concern for the resulting impact on class rates is well articulated by a past order in Connecticut which required Connecticut Natural Gas and Southern to classify mains into a demand and customer component.

> The Department believes that the results approval philosophy has two major limitations. First, it favors a select group of customers at the expense of others. Second, by commingling cost recovery and social policy it becomes difficult to distinguish between costs and policies. The Department believes strongly that a COSS should document costs as purely and accurately as

[26] I&E Statement No. 3 at 9-10.

possible, and that rate design is the proper venue for addressing social policies such as rate impact, gradualism and rate stability.[27]

The Connecticut Order also clarifies the rational for requiring the local gas distribution companies to classify mains into a demand and customer component.

> The investment an LDC makes in mains is clearly dependent upon 1) the number of customers served and 2) the maximum coincidental demand or combined demand of all customers on the peak day. Main extensions consist of two distinct cost activities. First, there is the cost associated with the trench required to reach customers. These costs consist of digging, laying a proper bed, back-filling, tamping, and asphalt patching. The second cost relates to the size of main installed where size is determined exclusively by the coincidental peak period demand of present and future users. Out of necessity, mains in New England must be sized to meet peak day demands as opposed to average period demand. Otherwise, the system will fail repeatedly and predictably throughout the winter.[28]

Q. Can you provide other examples of instances where utility regulators have authorized a customer component of gas distribution mains across the United States?

A. Yes. Atrium conducted research in the fall of 2025 for all states that have had utility commission orders rendered in fully litigated gas general rate cases. Referring to Rebuttal Exhibit JDT-19-R-B, the survey indicates that 44 state utility regulatory commissions (including the District of Columbia) rely upon the results of an embedded cost of service study for ratemaking purposes. Of those states, there are 26 states that utilize a minimum system, zero intercept, or other methods to classify the costs of distribution mains between customer-related and demand-related for gas utilities, along with some form of a coincident peak method for the demand component.

[27] State of Connecticut - Department of Public Utility Control, Docket No. 99-03-28, Final Decision dated August 9, 2000, pages 9-10.
[28] *Id*. at pages 9-10.

Q. What are the consequences of adopting the P&A methodology recommended by Mr. Deupree?[29]

A. P&A assigns higher costs to customers with higher annual usage even when they do not cause greater mains investment. Two customers with identical peak demands but different annual throughput impose the same system costs, yet P&A assigns them different cost responsibilities. This outcome is inconsistent with both engineering reality and economic cost causation.

Q. How do you respond to Mr. Deupree's summation of the Company's cost allocation proposal for distribution mains as "inconsistent with the allocation approach utilized in the Company's prior rate case that relied on a P&A cost allocation methodology?"[30]

A. The Company cost allocation proposal in this case is identical to its proposal in the last case, allocating distribution mains based on the customer demand methodology. A compromise allocation approach, agreed upon in settlement in the prior case, is non-precedential, and "does not reflect any agreement among the Joint Petitioners regarding the appropriate cost allocation methodology."[31] The Company holds the customer demand methodology to be the superior and appropriate cost allocation methodology.

[29] OCA Statement No. 1 at 62.
[30] OCA Statement No. 1 at 58.
[31] Docket No. R-2022-3035730, National Fuel, PA PUC, *Joint Petition for Approval of Settlement of Rate Proceeding*, (April 13, 2023), Pages 8-9

Q. Is your proposed allocation of distribution mains in this proceeding inconsistent with your recommended cost allocations in other Pennsylvania proceedings, as Mr. Deupree asserts[32]?

A. No. In my prior testimony, including testimony presented in Pennsylvania and in other jurisdictions, I explained that cost allocation methodologies are guided by cost causation, but are also influenced by factors such as regulatory precedent, data availability, and the specific characteristics of the utility's system. Here, the Company has provided a more developed basis for evaluating the drivers of distribution main costs, and the proposed customer-demand allocator reasonably reflects cost causation based on that record. The selection of a particular cost allocation methodology is driven by the specific facts and issues presented in each utility's rate case. Regulation evolves over time, as demonstrated by FERC no longer relying on the Seaboard method and by state Commissions evaluating the reasonableness of different allocation methods. Accordingly, an expert's support for an A&E allocator for distribution mains in a different docket does not make the Company's customer-demand based distribution mains allocator here unreasonable or "inconsistent." The appropriate ACOSS methods must be evaluated on a case-by-case basis in light of the record in each proceeding and the objective of aligning cost responsibility with how the distribution system is designed, constructed, and operated.

[32] OCA Statement No. 1 at 60.

IV. RATE DESIGN – CUSTOMER CHARGE

Q. Please summarize the Company's proposed increase to the residential basic service charge.

A. The Company proposes to increase the residential basic service charge from $14.00 per month to $19.00 per month as part of its overall rate design. While the Company's ACOSS indicates a residential monthly customer charge of approximately $27.00, the Company is not proposing to move immediately to that level. Instead, the proposed $5.00 increase represents a measured and moderated step toward better alignment between the fixed monthly charge and the customer-classified costs incurred to provide residential service.[33]

Q. Please summarize the positions taken by OCA, I&E, CAUSE-PA, and PWPTF regarding the Company's proposed increase to the residential basic service charge.

A. OCA, I&E, CAUSE-PA, and PWPTF each oppose the Company's proposed increase to the residential basic service charge, although they do so for somewhat different reasons.

OCA witness Deupree opposes the Company's proposed increase on the basis that he does not support the ACOSS methodologies underlying the Company's customer charge design and further contends that the current residential customer charge already recovers a substantial portion of customer-related costs. OCA alternatively recommends that any increase to the residential customer charge be limited to approximately the overall percentage increase assigned to the Residential class.[34]

Similarly, I&E witness Cline does not support the Company's proposed increase

[33] National Fuel Statement No. 14 at 18.
[34] OCA Statement No. 1 at 82-83.

because he rejects the ACOSS methodology used by the Company to develop customer-related costs and states that the Company did not provide a separate customer charge analysis based on his preferred Peak and Average ACOSS approach. I&E therefore recommends a more limited increase to the residential customer charge.[35]

CAUSE-PA and PWPTF oppose the proposed increase primarily on policy grounds. CAUSE-PA asserts that increasing the residential fixed monthly charge would disproportionately impact low-use and low-income customers by increasing the unavoidable portion of customer bills and reducing customers' ability to manage bills through lower consumption.[36] PWPTF raises similar concerns, arguing that an increase in the fixed monthly charge would discourage conservation and would be particularly burdensome to low-income customers absent additional universal service relief.[37]

Q. Do you agree with the criticisms raised by OCA witness Deupree and I&E witness Cline regarding the Company's proposed increase to the residential basic service charge?

A. No. I do not. Both OCA witness Deupree and I&E witness Cline suggest that because they disagree with the Company's ACOSS treatment of distribution mains, the Company's proposed residential customer charge is unsupported or should be materially reduced. That conclusion is misplaced.

The residential monthly customer charge benchmark of $27.17 reflected in the Company's ACOSS is derived from customer-classified costs and does not include

[35] I&E Statement No. 3 at 14-15.
[36] CAUSE-PA Statement No. 1 at 51.
[37] PWPTF Statement No. 1 at 4-6.

distribution mains investment. Although the Company's ACOSS uses a blended customer-demand allocator in assigning distribution mains costs to customer classes for purposes of determining overall class cost responsibility, distribution mains remain classified as 100% demand-related within the ACOSS model and are therefore excluded from the calculation of the residential customer unit cost used to inform the basic service charge.

As a result, modifying the distribution mains allocation methodology from the Company's filed ACOSS approach to a P&A approach does not change the residential customer-related unit cost. Indeed, as reflected in Schedule 7 of Exhibit D and Exhibit JDT-19-R-A, the residential monthly customer unit cost remains the same under both studies.

Q. How do you respond to OCA witness Deupree and I&E witness Cline's recommendation that the proposed monthly Residential customer charge be scaled back proportionately if the Commission approves a lower revenue requirement?[38]

A. I disagree with their recommendation. Rate design should be based on the cost to serve, not applied as a function of comparing National Fuel's revenue requirement request with what is authorized. Scaling back the customer charge merely to match a reduced revenue requirement would disconnect the rate design from cost causation principles and potentially result in an under-recovery of fixed costs. This shift would necessarily increase the portion of revenue recovered through volumetric charges, distorting price signals and potentially creating intra-class subsidies between low- and high-use customers. As noted by NARUC

[38] OCA Statement No. 1 at 83 and I&E Statement No. 3 at 16.

in its Gas Rate Design Manual, "Ideally, the customer charge should recover all customer costs."[39] The Company's proposed customer charge, which is below the $27 customer related unit cost identified in the ACOSS,[40] was developed to reflect these cost-based principles and should be evaluated independently of the total revenue level ultimately approved by the Commission.

Q. CAUSE-PA and PWPTF argue that increasing the residential customer charge will disproportionately harm low-use and low-income customers by increasing the unavoidable portion of bills. Do you agree?

A. No. That conclusion assumes that low-income and low-use customers are a uniform group and that affordability is determined solely by minimizing fixed charges. Low-income customers are not homogeneous in their usage patterns; while some use less than average, others use more due to numerous factors, similar to non-low-income customers, where usage levels vary. As a result, placing a greater share of fixed cost recovery in volumetric rates can actually impose greater burdens on certain low-income customers, particularly during the winter months when usage is least discretionary and bills are highest. A balanced rate design that includes a reasonable fixed charge helps mitigate these regressive impacts by moderating seasonal bill volatility and improving predictability.

[39] National Association of Regulatory Utility Commissioners (NARUC), *Gas Rate Design Manual*, June 1989, p.49.
[40] National Fuel Statement No. 14 at 18.

Q. How does recovering fixed costs through volumetric charges affect low-income customers differently than higher-income customers?

A. Recovering fixed distribution costs through volumetric charges concentrates cost recovery in periods of high usage, most notably during the winter heating season. Low-income customers often have limited financial flexibility and little ability to reduce essential usage during these periods. Unlike higher-income households, they may not be able to invest in energy efficiency or weatherization, and many renters cannot make such investments at all. Consequently, higher winter volumetric rates lead not to meaningful conservation, but to higher arrearages or reductions in essential energy use that negatively affect health and quality of life. This dynamic is regressive and does not promote affordability.

Q. CAUSE-PA and PWPTF contend that higher fixed charges discourage conservation by weakening price signals.[41] Is volumetric pricing an effective conservation signal for residential customers?

A. Not necessarily. For many residential customers, particularly low-income households, energy usage during the winter is largely inelastic. Space heating, hot water, and cooking are essential services, and customers often lack realistic alternatives or flexibility to significantly reduce usage. Rate designs that over-rely on volumetric recovery exacerbate winter bill spikes, when customers' ability to reduce usage is most constrained. By spreading recovery more evenly across months, a reasonable customer charge enhances

[41] CAUSE-PA Statement No. 1 at 51 and PWPTF Statement No. 1 at 4.

bill predictability and can improve customers' ability to plan and manage household budgets.

Moreover, under National Fuel's proposed $19 monthly residential customer charge, approximately 59% of residential distribution revenues would continue to be recovered through volumetric delivery charges. As a result, the majority of a residential customer's bill would remain usage-based. This indicates that customers retain meaningful opportunities to reduce their gas bills by employing energy efficiency measures, practicing conservation, and making behavioral adjustments. Assertions that an increased customer charge eliminates the incentive or ability to lower bills are not substantiated by the data.

Q. Does increasing the customer charge eliminate or meaningfully weaken conservation incentives for residential customers?

A. No. The Company's proposal maintains a meaningful volumetric rate component, ensuring that customers continue to receive a usage-based price signal. The proposed increase in the customer charge does not eliminate volumetric pricing; rather, it represents a measured rebalancing that reduces the over recovery of fixed costs through per-unit charges. This adjustment improves price transparency and accuracy while still preserving incentives for customers to manage discretionary usage where feasible.

V. WEATHER NORMALIZATION ADJUSTMENT

Q. Please summarize the Company's proposal regarding the WNA and describe the key components of the mechanism.

A. The Company proposes that the existing WNA, currently operating as a pilot approved in the Company's 2022 base rate case, be approved as a permanent ratemaking mechanism. The WNA adjusts the delivery portion of customer bills so that billed usage reflects consumption under normal weather conditions rather than actual temperatures experienced during the heating season, thereby moderating the effects of abnormal weather on both customer bills and the Company's recovery of Commission-approved distribution revenues.

The WNA operates by comparing actual HDD to normal HHD and adjusting billed usage for deviations outside a defined deadband. The mechanism includes a ±3 percent deadband to avoid adjustments for minor weather variations and applies only during the heating season, October through May. The WNA is customer-specific, revenue-neutral within each customer class, and applies to Residential and Commercial/Public Authority customers.

In this proceeding, the Company proposes one modification to the existing WNA: establishing normal HDD using a 10-year weather average rather than a 15-year average, in order to better reflect more recent weather patterns while retaining the stabilizing features of the mechanism.[42]

[42] National Fuel Statement No. 19 at 23-25.

Q. What are the parties' positions in this case regarding the WNA?

A. OCA witness Deupree recommends that the Commission discontinue the WNA altogether, finding that the pilot has operated as an asymmetric surcharge that has produced net customer charges rather than balanced surcharges and credits. OCA contends that the WNA is unnecessary given the Company's use of a fully projected future test year and DSIC, which already mitigate regulatory lag. Mr. Deupree also indicates that budget billing can "smooth customer bills without a WNA."[43] In the alternative, if the Commission elects to continue the WNA, OCA recommends that it remain a time-limited pilot, not a permanent mechanism, with additional protections including a 5% deadband and elimination of October and May from the WNA period.[44]

Similarly, CAUSE-PA opposes making the WNA permanent and recommends that the mechanism be terminated. CAUSE-PA argues that the WNA shifts weather-related risk from the Company to customers, undermines bill transparency, and exacerbates energy affordability and energy insecurity, particularly for low-income households. CAUSE-PA emphasizes that the WNA has resulted in net surcharges during its pilot period, and reduces customers' ability to manage bills through conservation or efficiency. Like OCA, CAUSE-PA asserts that the Company already has sufficient risk-mitigation tools and that continuation of the WNA is inconsistent with affordability and consumer-protection objectives.[45] If the WNA is permitted to continue, it should remain a pilot for no more than three years, exclude CAP customers, operate only from December through March, increase

[43] OCA Statement No. 1 at 30.
[44] OCA Statement No. 1 at 33-35, 38-39.
[45] CAUSE-PA Statement No. 1 at 55-56.

the deadband to 5%, and use a rolling 10-year historical average updated annually.[46]

I&E does not oppose continuation of the WNA in principle but recommends modifications to strengthen customer protections. Specifically, I&E supports the Company's proposal to calculate normal HDD using a 10-year weather average, finding it more reflective of recent weather trends and consistent with Commission precedent. However, I&E recommends excluding the shoulder month of May from the WNA period and increasing the deadband from 3% to 5%, relying on the Commission's reasoning in the recent Columbia Gas of Pennsylvania decision that a wider deadband better captures normal weather variation and places greater forecasting responsibility on the utility.[47]

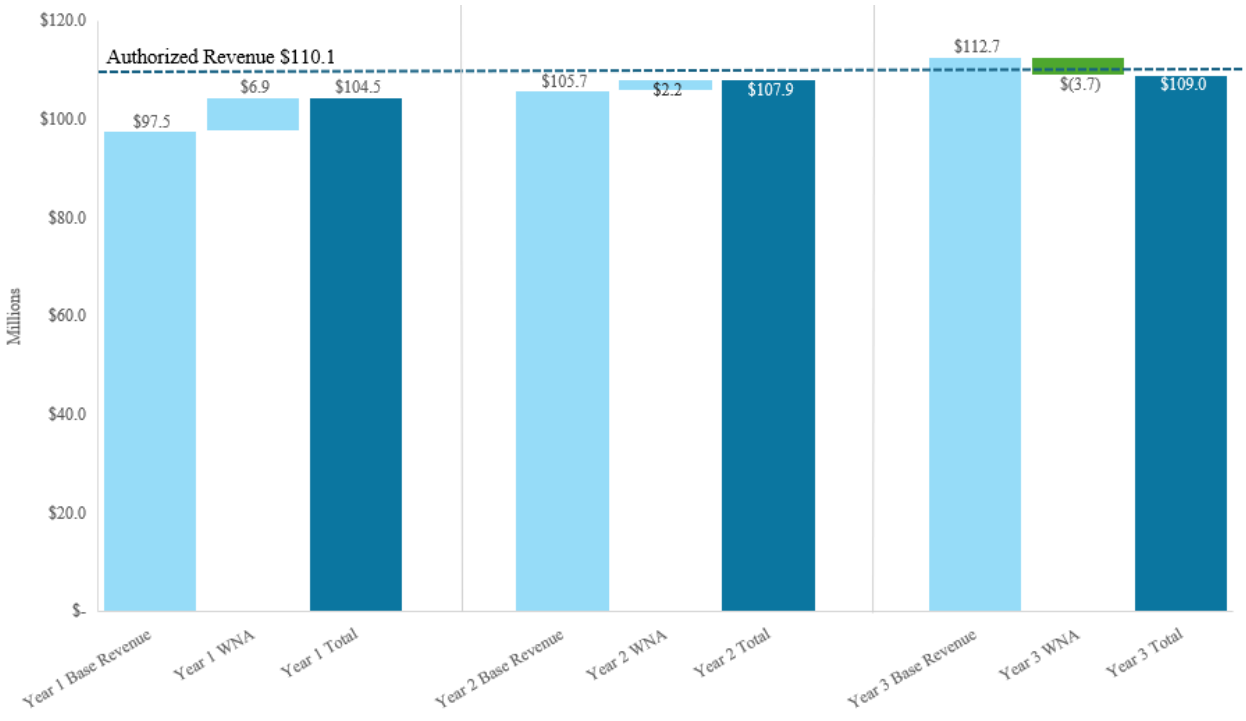
Q. How do you respond to Mr. Deupree's statement that the WNA is a "one-way surcharge mechanism"[48]?

A. I disagree with Mr. Deupree's characterization. The WNA is not a "one-way surcharge mechanism." If it were, customers would not receive credits in periods when actual weather is colder than normal in a manner that produces downward WNA adjustments. The most recent example is the 2025–2026 heating season, during which customers received approximately $2.6 million in net WNA credits. Further, the mechanism operates as intended: it provides the Company an opportunity to come closer to recovering its Commission-authorized distribution revenue requirement by reducing weather-driven volatility in margin recovery, not by guaranteeing revenue or enabling over-collection, while protecting customers from paying more during colder than normal periods when gas

[46] CAUSE-PA Statement No. 1 at 59-60.
[47] I&E Statement No. 3 at 6-7.
[48] OCA Statement No. 1 at 33.

usage increases. **Figure 1** below compares the Company's authorized distribution revenues to the combination of base-rate revenues and WNA adjustments for the twelve months ended July 31, 2024 ("Year 1"), the twelve months ended July 31, 2025 ("Year 2"), and the projected twelve months ending July 31, 2026 ("Year 3"). As shown, in each period total revenues recovered, inclusive of WNA adjustments, remain below the Company's authorized revenue level. Specifically, the Company recovered approximately 95 percent of authorized revenues in Year 1, approximately 98 percent in Year 2, and is projected to recover approximately 99 percent in Year 3. This demonstrates that the WNA does not guarantee or result in overcollection of revenues for the Company; rather, it reduces weather-related fluctuations.

Figure 1 - Comparison of Actual Revenue to Authorized Revenue



Q. Mr. Deupree asserts that the WNA is "not required to address regulatory lag concerns of the Company given the Company's use of a FPFTY and DSIC."[49] Do you agree?

A. No. First, the Company has not asserted that the WNA is needed to address regulatory lag, and framing the issue that way creates a straw-man argument that Mr. Deupree has advanced and then spent time rebutting. In fact, the entirety of Mr. Deupree's testimony on regulatory lag is a red herring – a distraction made to divert attention from the central issue – the WNA's purpose of addressing over dependance on volumetric recovery and increased risk to customers and the Company which is decreased with the WNA in place. Mr. Deupree's assertion reflects a conflation of revenue stabilization mechanisms and regulatory lag mitigation mechanisms, which serve distinct purposes. A WNA is designed to reduce weather-driven volatility in billed volumes and distribution margin recovery by normalizing usage to "normal" HDD conditions. By contrast, mechanisms such as a fully projected future test year ("FPFTY") and the Distribution System Improvement Charge ("DSIC") address timing issues, i.e., the lag between when costs are incurred (or investments are made) and when those costs are reflected in base rates.

Importantly, the WNA does not accelerate cost recovery, establish interim rates, or otherwise change when the Company may begin collecting particular costs from customers. Nor does it change the Company's Commission-authorized revenue requirement. Instead, it adjusts a weather-sensitive billing determinant so that revenues are less dependent on whether a given winter is warmer or colder than normal.

[49] OCA Statement No. 1 at 38.

For clarity, **Table 2** below summarizes the key distinctions between the WNA mechanism and commonly used regulatory lag mitigation mechanisms.

Table 2 – Comparison of WNA mechanism vs. Regulatory Lag Mitigation Mechanism

	WNA Mechanism	**Regulatory Lag Mitigation Mechanism**
Purpose	To normalize billed distribution revenues and/or volumes for abnormal weather so that billed amounts reflect normal HDD conditions.	To reduce the time lag between when a utility incurs or forecasts costs (or makes investments) and when those costs are reflected in customer rates.
Trigger	Deviations between Actual HDD and Normal HDD, typically during the heating season.	Differences between costs incurred or forecasted and the costs reflected in current base rates during the period between general rate cases.
What It Adjusts	A weather-related usage or billing determinant used in the distribution charge. WNA does not change the Commission approved or authorized revenue requirement.	Rate levels or the timing of cost recovery through riders or trackers, forecast or future test years, formula rate mechanisms, interim rates, among others.
Time Dimension	Operates within billing periods (e.g., monthly), based on observed weather conditions. Application may be constrained by a deadband and limited to specific months (such as the heating season).	Operates between rate cases (over months or years) and is tied to the regulatory process timeline.
Key Point	WNA addresses weather variability, not the timing of when costs are recognized or recovered in rates.	Regulatory lag mitigation addresses cost recovery timing, not weather driven consumption variability.

Accordingly, Mr. Deupree's attempt to characterize the WNA as a regulatory lag remedy is at best an error of his part and at worst a purposeful diversion. The WNA does not accelerate cost recovery or change the Company's authorized revenue requirement; it merely normalizes a weather-sensitive billing determinant.

Q. Mr. Deupree suggests that "budget billing" offers the same features as the WNA when it comes to normalizing billing.[50] How do you respond?

A. Budget billing and the WNA serve fundamentally different purposes. The WNA is an alternative ratemaking mechanism intended to stabilize distribution margin recovery and moderate customer bill impacts associated with deviations between actual and normal weather (an external factor outside the Company's and customers' control). By contrast, National Fuel's Budget Plan is a bill payment option that allows customers to pay levelized amounts based on prior usage, with periodic true-ups to reconcile the budgeted payments to the customer's actual billed usage.

Critically, because the Budget Plan trues up to actual usage, it does not "normalize" usage to normal weather conditions. For example, if weather is colder than normal, a Budget Plan customer will still ultimately pay for the higher actual usage through the next true-up. Under the WNA, however, that same customer could receive a credit for the portion of usage attributable to weather that was colder than normal, because the mechanism adjusts billed usage toward a normal-weather benchmark. In other words, the Budget Plan can smooth the timing of payments, but it does not change rate design, does not address weather-driven deviations from normal consumption, and therefore does not mitigate the corresponding bill and revenue volatility that the WNA is designed to address.

Q. Mr. Geller suggests that a warming trend means that, even as annual temperatures vary year by year, the WNA "will produce greater and greater revenue" for the

[50] OCA Statement No. 1 at 30.

Company for gas service that customers will not actually use or need."[51] How do you respond?

A. I disagree. Mr. Geller's statement conflates weather normalization with creating additional sales or increasing the Company's authorized revenue. The WNA does not charge customers for gas they do not use; rather, it adjusts the delivery billing determinant to reflect what usage would have been under normal weather conditions and it operates in both directions, producing either surcharges or credits depending on whether actual HDD are warmer or colder than normal.

To the extent long-term weather patterns change, that is precisely why the Company proposes to update the normal HDD baseline from a 15-year average to a more recent 10-year average. Using a more current normal better aligns the WNA benchmark with contemporary conditions and reduces the potential for systematic bias that could occur if an outdated "normal" were retained. In addition, the WNA does not accelerate cost recovery or change the Commission-authorized revenue requirement; it provides only an opportunity to reduce weather-related fluctuations in margin recovery around the level established in base rates. Accordingly, a generalized "warming trend" does not imply that the WNA will generate ever-increasing revenues, rather, the adjustment will continue to reflect differences between actual HDD and the applicable normal in each season.

[51] CAUSE-PA Statement No. 1 at 57.

Q. Mr. Geller contends that the WNA undermines bill transparency because "it charges customers not for their actual usage, but for hypothetical usage."[52] How do you respond?

A. I disagree with that characterization. First, customers' gas supply charges are still based on their actual metered usage. The WNA applies only to the delivery component and adjusts a weather-sensitive billing determinant using a defined, tariffed formula that compares actual HDD to the same "normal" HDD baseline used for ratemaking purposes, subject to a deadband. This adjustment does not create additional consumption or collect revenues unrelated to service provided. Second, while the WNA calculation is necessarily formula-based, it is no more "nuanced" than other tariffed riders that rely on objective inputs, and the result is transparent to customers because it is shown as a separate WNA line item on the bill. In fact, by explicitly quantifying the impact of weather that differs from normal, the WNA can make the source of bill variation clearer.

Q. Mr. Geller argues that the WNA exacerbates affordability and energy insecurity, particularly for low-income households.[53] Do you agree?

A. No. The WNA is designed to reduce weather-driven bill volatility, particularly in unusually cold periods when bills are highest and customers' ability to reduce essential heating usage is most constrained. By moderating abnormal weather impacts, the WNA can improve predictability and help reduce the risk of sudden bill spikes that contribute to arrearages.

[52] CAUSE-PA Statement No. 1 at 58.
[53] CAUSE-PA Statement No. 1 at 59.

To the extent the Commission determines that additional affordability protections are warranted for income-eligible customers, those protections are most appropriately implemented through targeted universal service programs (e.g., CAP) and other assistance mechanisms, not by eliminating a weather-normalization tool for the broader customer base.

Q. Mr. Geller asserts that the WNA reduces customers' ability to manage bills through conservation or efficiency.[54] How do you respond?

A. I disagree. The WNA does not replace volumetric delivery rates or remove the linkage between usage and a customer's bill. Customers still pay for the gas they use, and they continue to benefit from conservation and efficiency through lower base-rate volumetric charges and lower gas costs. The WNA simply adjusts for abnormal deviations from normal weather conditions so that a customer's bill is less dependent on whether a particular season is warmer or colder than normal. That design purpose is fundamentally different from, and does not preclude, conservation or efficiency efforts.

Q. What would be the impact of discontinuing or limiting the WNA as proposed by these parties?

A. Discontinuing or limiting the WNA, as proposed by OCA[55], CAUSE-PA[56] and I&E,[57]

[54] CAUSE-PA Statement No. 1 at 58.
[55]OCA Statement No. 1 at 38-39.
[56]CAUSE-PA Statement No. 1 at 59-60.
[57]I&E Statement No. 3 at 6-7.

would materially weaken the mechanism and reintroduce volatility into revenue recovery for both the Company and customers. The WNA serves as a two-sided buffer: it reduces the risk of under-recovery in mild winters and helps limit excessive charges in colder winters. In particular, when weather is unusually cold and customer bills are highest, the WNA helps moderate bill impacts; accordingly, modifications that reduce its effectiveness may harm customers. Likewise, exempting all confirmed low-income customers from the WNA would undermine the mechanism's fairness and consistency by creating intra-class cost shifts that require other customers to assume a disproportionate share of revenue stabilization. National Fuel already addresses low-income affordability through targeted programs, as discussed in the rebuttal testimony of Company witness Matthew Stoops, National Fuel Statement No. 17-R. Those programs are the appropriate means of supporting income-eligible customers.

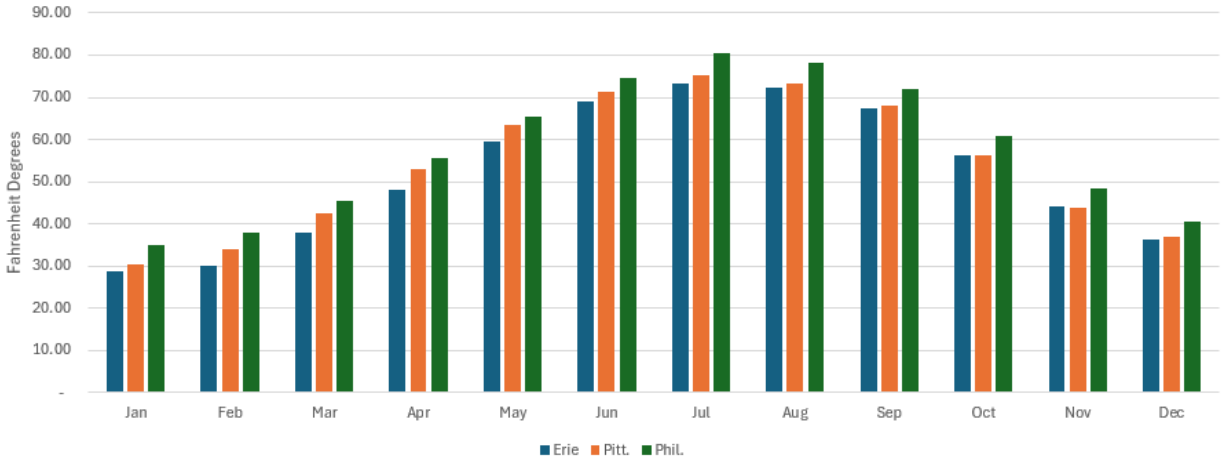
Q. Can you provide an example from the most recent WNA season that illustrates how the mechanism benefits customers?

A. Yes. During the most recent WNA season (October 2025 through March 2026), customers received approximately $2.6 million in net WNA credits. Absent the WNA, customers would not have received those credits. Moreover, if the WNA deadband were increased, customers would receive fewer credits (i.e. smaller bill offsets) because a greater portion of weather-related deviations would fall within the deadband and therefore would not be credited through the mechanism.

Q. Do you have specific concerns about removing certain months from the WNA application?

A. Yes. The Company's customers are concentrated in the northwest corner of Pennsylvania, where weather conditions, and corresponding HDD, tend to be more severe than in other specific areas of the Commonwealth. As a result, the so-called "shoulder" months (particularly October and May) in the Company's service territory can reflect meaningful space-heating requirements. Figure 2 supports this point by showing that the Company's service territory experiences lower average temperatures in October and May than other areas of Pennsylvania, specifically Philadelphia, indicating that heating needs can remain material during those months. Because the WNA is designed to moderate the impact of abnormal weather on both bills and revenue recovery during months when heating load is material, removing October and/or May would reduce customer protections in months when customers in northwest Pennsylvania can still face weather-driven bill volatility. In other words, applying a uniform, statewide view of "shoulder months" without recognizing regional temperature differences and specific service territories would not reflect the Company's operating realities and could unnecessarily narrow the WNA's effectiveness for the customers it is intended to protect.

Figure 2 – 2014-2025 Average Temperature



Q. Are there any issues with Mr. Geller's proposal "use a rolling ten-year historical average that is updated annually to calculate any WNA that is permitted to continue"[58]?

A. Yes. Applying a rolling ten-year average specifically for WNA calculations is not recommended unless the same rolling approach is also used to reset base-rate billing determinants at the same time, which creates unnecessary confusion and administrative burden. If base rates are set using a fixed ten-year normal (e.g., 2015–2024) while WNA calculations later transition to a different rolling ten-year period (e.g., 2016–2025), the WNA would compare actual weather to a baseline inconsistent with the rate-setting baseline. This misalignment could result in over- or under-correction relative to the assumptions embedded in customer rates, which is contrary to the WNA's objective of reconciling actual weather to the same normalized weather conditions used in establishing base rates. Maintaining a consistent HDD baseline for both functions aligns with the

[58] CAUSE-PA Statement No. 1 at 60.

overarching utility ratemaking "matching principle," which requires that the utility align revenue requirements and billing determinants within the same period and under the same assumptions when setting rates. Therefore, rather than using a rolling period or defining a fixed frequency for recalculation, the Company recommends recalculating the normal HDD ten-year average based on the most recently completed ten-year period that ended during the historic test year as used in the base rate case for setting rates. In this case, that would be the ten-year period ending December 31, 2024.

Q. What concluding remarks do you have about the connection between fixed charges and the WNA?

A. In summary, Pennsylvania rate design recovers a substantial portion of fixed distribution costs through volumetric charges. This can produce inefficient economic outcomes and increases the potential for over- or under-recovery relative to the Commission-authorized revenue requirement. Further, proposals to reduce the fixed customer charge increase reliance on volumetric recovery, which increases weather-driven revenue variability and, correspondingly, the need for a WNA to better align revenues with the approved revenue requirement. Even under the Company's proposed customer charge of $19, 58.7%, distribution cost recovery is still in volumetric charges, exposing customers to the risk of high bills during colder-than-normal periods, which the WNA directly mitigates.

Q. Does this conclude your rebuttal testimony at this time?

A. Yes, it does.

NATIONAL FUEL EXHIBIT JDT-19-R-A

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study under Peak & Average
Test Year Ending October 31, 2027
SCHEDULE 1 - ACCOUNT BALANCES AND ALLOCATION METHODS
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
1	**RATE BASE**								
2	**Plant in Service**								
3	**Intangible Plant**								
4	Organization	301.0	-	INT_PROD_TRANSM_DIST_SUBTOTAL					
5	Franchises & Consents	302.0	-	INT_PROD_TRANSM_DIST_SUBTOTAL					
6	Misc. Intangible Plant	303.0	25,789	INT_OML					
7	Subtotal - Intangible Plant		25,789						
8	**Natural Gas Production Plant**								
9	Land and Land Rights	325.0	60		PRODUCTION	COMMODITY		SALES_COM	
10	Structures and Improvements	328.0	12		PRODUCTION	COMMODITY		SALES_COM	
11	Mains	329.0	3		PRODUCTION	COMMODITY		SALES_COM	
12	Lines	332.0	533		PRODUCTION	COMMODITY		SALES_COM	
13	Measuring and Regulating Equipment	334.0	3,914		PRODUCTION	COMMODITY		SALES_COM	
14	Subtotal - Natural Gas Production Plant		4,522						
15	**Transmission plant**								
16	Land and Land Rights	365.1	-		TRANSMISSION	DEMAND	PDAY		
17	Rights-of-Way	365.2	3,363		TRANSMISSION	DEMAND	PDAY		
18	Structures and improvements	366.0	306		TRANSMISSION	DEMAND	PDAY		
19	Mains	367.0	92,168		TRANSMISSION	DEMAND	PDAY		
20	Measuring and regulating station equipment	369.0	10,415		TRANSMISSION	DEMAND	PDAY		
21	Subtotal - Transmission plant		106,251						
22	**Distribution Plant**								
23	Land and land rights	374.0	17,091		DISTRIBUTION	DEMAND	PEAK_AVRG		
24	Structures and improvements	375.0	13,912	INT_DIST_SUBTOTAL					
25	Mains	376.0	429,663		DISTRIBUTION	DEMAND	PEAK_AVRG		
26	Measuring and regulating station equipment—general	378.0	11,812		DISTRIBUTION	DEMAND	PEAK_AVRG		
27	Measuring and regulating station equipment—city gate check stations	379.0	-						
28	Services	380.0	245,617		CUSTOMER	CUSTOMER			SERV
29	Meters	381.0	18,771		CUSTOMER	CUSTOMER			MTRS
30	Meter installations	382.0	3,769		CUSTOMER	CUSTOMER			MTRS
31	House regulators	383.0	-						
32	House regulatory installations	384.0	1,311		CUSTOMER	CUSTOMER			MTRS
33	Industrial measuring and regulating station equipment	385.0	20,008		CUSTOMER	CUSTOMER			M&R
34	Subtotal - Distribution Plant		761,953						
35	**General Plant**								
36	Land and Land Rights	389.0	-	INT_OML					
37	Structures and Improvements	390.0	1,444	INT_OML					
38	Office Furniture and Equipment	391.0	9,989	INT_OML					
39	Transportation Equipment	392.0	17,271	INT_OML					
40	Tools, Shop, and Garage Equipment	394.0	12,168	INT_OML					
41	Laboratory Equipment	395.0	-						
42	Power Operated Equipment	396.0	12,847	INT_OML					
43	Communication Equipment	397.0	5,002	INT_OML					
44	Misc. Equipment	398.0	-						
45	Other Intangible Property	399.0	-						
46	Subtotal - General Plant		58,721						
47	**Total Plant in Service**		957,237						

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($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
48	**Accumulated Depreciation & Amortization Expense**								
49	**Intangible Plant**								
50	Organization	301.0	-	INT_PROD_TRANSM_DI	-	-	-	-	-
51	Franchises & Consents	302.0	-	INT_PROD_TRANSM_DI	-	-	-	-	-
52	Misc. Intangible Plant	303.0	(22,959)	INT_OML	-	-	-	-	-
53	Subtotal - Intangible Plant		(22,959)						
54	**Natural Gas Production Plant**								
55	Land and Land Rights	325.0	(35)	-	PRODUCTION	COMMODITY	-	SALES_COM	-
56	Structures and Improvements	328.0	(10)	-	PRODUCTION	COMMODITY	-	SALES_COM	-
57	Mains	329.0	(1)	-	PRODUCTION	COMMODITY	-	SALES_COM	-
58	Lines	332.0	(175)	-	PRODUCTION	COMMODITY	-	SALES_COM	-
59	Measuring and Regulating Equipment	334.0	(1,777)	-	PRODUCTION	COMMODITY	-	SALES_COM	-
60	Subtotal - Natural Gas Production Plant		(1,998)						
61	**Transmission plant**								
62	Land and Land Rights	365.1	-	0	TRANSMISSION	DEMAND	PDAY	-	-
63	Rights-of-Way	365.2	(699)	0	TRANSMISSION	DEMAND	PDAY	-	-
64	Structures and improvements	366.0	(125)	0	TRANSMISSION	DEMAND	PDAY	-	-
65	Mains	367.0	(23,289)	0	TRANSMISSION	DEMAND	PDAY	-	-
66	Measuring and regulating station equipment	369.0	(4,442)	0	TRANSMISSION	DEMAND	PDAY	-	-
67	Subtotal - Transmission plant		(28,555)						
68	**Distribution Plant**								
69	Land and land rights	374.0	(3,405)	0	DISTRIBUTION	DEMAND	PEAK_AVRG	-	-
70	Structures and improvements	375.0	(6,914)	INT_DIST_SUBTOTAL	0	0	0	-	-
71	Mains	376.0	(121,367)	0	DISTRIBUTION	DEMAND	PEAK_AVRG	-	-
72	Measuring and regulating station equipment—general	378.0	(4,610)	0	DISTRIBUTION	DEMAND	PEAK_AVRG	-	-
73	Measuring and regulating station equipment—city gate check stations	379.0	-	0	0	0	0	-	-
74	Services	380.0	(91,472)	0	CUSTOMER	CUSTOMER	0	-	SERV
75	Meters	381.0	(7,080)	0	CUSTOMER	CUSTOMER	0	-	MTRS
76	Meter installations	382.0	(1,965)	0	CUSTOMER	CUSTOMER	0	-	MTRS
77	House regulators	383.0	-	0	0	0	0	-	-
78	House regulatory installations	384.0	(620)	0	CUSTOMER	CUSTOMER	0	-	MTRS
79	Industrial measuring and regulating station equipment	385.0	(7,654)	0	CUSTOMER	CUSTOMER	0	-	M&R
80	Subtotal - Distribution Plant		(245,087)						
81	**General Plant**								
82	Land and Land Rights	389.0	-	INT_OML	-	-	-	-	-
83	Structures and Improvements	390.0	(157)	INT_OML	-	-	-	-	-
84	Office Furniture and Equipment	391.0	(5,423)	INT_OML	-	-	-	-	-
85	Transportation Equipment	392.0	(8,518)	INT_OML	-	-	-	-	-
86	Tools, Shop, and Garage Equipment	394.0	(2,723)	INT_OML	-	-	-	-	-
87	Laboratory Equipment	395.0	-	-	-	-	-	-	-
88	Power Operated Equipment	396.0	(3,401)	INT_OML	-	-	-	-	-
89	Communication Equipment	397.0	(1,751)	INT_OML	-	-	-	-	-
90	Misc. Equipment	398.0	-	-	-	-	-	-	-
91	Other Intangible Property	399.0	-	-	-	-	-	-	-
92	Subtotal - General Plant		(21,972)						
93	**Total Accumulated Depreciation & Amortization Expense**		(320,571)						

National Fuel Gas Distribution Corporation
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SCHEDULE 1 - ACCOUNT BALANCES AND ALLOCATION METHODS
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
94	**Other Rate Base Items**								
95	Materials And Supplies	154.0	1,587	INT_PROD_TRANSM_DIST_SUBTOTAL					
96	Stores Expense Undistributed	163.0	-	INT_PROD_TRANSM_DIST_SUBTOTAL					
97	Gas Stored Underground - PA	164.1	5,664		PRODUCTION	COMMODITY		INCR_WNTR	
98	Gas owed to system gas	117.4	-						
99	Prepayments	165.0	1,080	INT_TOTPLT					
100	Customer deposits	235.0	(5,166)		DISTRIBUTION	CUSTOMER			CUST
101	Accumulated deferred income taxes—other property	282.0	(73,925)	INT_TOTPLT					
102	Working capital allowance	N/A	5,675	INT_OM_Excl_A&G					
103	Subtotal - Other Rate Base Items		(65,085)						
104	**TOTAL RATE BASE**		571,582						
105	**OPERATION AND MAINTENANCE EXPENSE**								
106	**Production, Storage, LNG, Transmission, and Distribution Expense**								
107	**Manufactured Gas Production Expense**								
108	Operation Supv & Engineering	750.0	0		PRODUCTION	COMMODITY		SALES_COM	
109	Field Line Expenses	753.0	20		PRODUCTION	COMMODITY		SALES_COM	
110	Field Compressor St Expenses	754.0	3		PRODUCTION	COMMODITY		SALES_COM	
111	Measuring & Regulator Expenses	756.0	0		PRODUCTION	COMMODITY		SALES_COM	
112	Purification Expenses	757.0	1		PRODUCTION	COMMODITY		SALES_COM	
113	Other Expenses	759.0	(0)		PRODUCTION	COMMODITY		SALES_COM	
114	Maint Structures & Improvement	762.0	-		PRODUCTION	COMMODITY		SALES_COM	
115	Maint Field Lines	764.0	-		PRODUCTION	COMMODITY		SALES_COM	
116	Maint Field Meas & Reg Sta Eq	766.0	(0)		PRODUCTION	COMMODITY		SALES_COM	
117	Maint Purification Equipment	767.0	0		PRODUCTION	COMMODITY		SALES_COM	
118	Maint Other Equipment	769.0	5		PRODUCTION	COMMODITY		SALES_COM	
119	**Subtotal - Manufactured Gas Production Expense**		29						

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study under Peak & Average
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SCHEDULE 1 - ACCOUNT BALANCES AND ALLOCATION METHODS
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
120	**Other Gas Supply Expenses**								
121	Natural gas field line purchases	801.0	65,714		GAS SUPPLY	COMMODITY		GASCOST	
122	Natural gas city gate purchases	804.0	54		GAS SUPPLY	COMMODITY		GASCOST	
123	Exchange gas	806.0	573		GAS SUPPLY	COMMODITY		GASCOST	
124	Well expenses—Purchased gas	807.1	189		PRODUCTION	COMMODITY		SALES_COM	
125	Operation of purchased gas measuring stations.	807.2	-		PRODUCTION	COMMODITY		SALES_COM	
126	Maintenance of purchased gas measuring stations.	807.3	-		PRODUCTION	COMMODITY		SALES_COM	
127	Purchased gas calculations expenses.	807.4	-		PRODUCTION	COMMODITY		SALES_COM	
128	Other purchased gas expenses.	807.5	-		PRODUCTION	COMMODITY		SALES_COM	
129	Gas withdrawn from storage—debit	808.1	42,369		GAS SUPPLY	COMMODITY		GASCOST	
130	Gas delivered to storage—credit	808.2	(41,357)		GAS SUPPLY	COMMODITY		GASCOST	
131	Gas used for other utility operations—credit	812.0	(39)		PRODUCTION	COMMODITY		SALES_COM	
132	**Subtotal - Other Gas Supply Expenses**		67,501						
133	**Underground Storage Expenses - Operation**								
134	Operation supervision and engineering	814.0	-						
135	Maps and records	815.0	-						
136	Wells expenses	816.0	-						
137	Lines expenses	817.0	-						
138	Compressor station expenses	818.0	-						
139	Compressor station fuel and power	819.0	-						
140	Measuring and regulating station expenses	820.0	-						
141	Purification expenses	821.0	-						
142	Exploration and development	822.0	-						
143	Gas losses	823.0	-						
144	Other expenses	824.0	-						
145	Storage well royalties	825.0	-						
146	Rents	826.0	16,746		GAS SUPPLY	COMMODITY		GASCOST	
147	Subtotal - Underground Storage Expenses - Operation		16,746						
148	**Transmission Operation Expenses**								
149	Operation supervision and engineering	850.0	2		TRANSMISSION	DEMAND	PDAY		
150	System control and load dispatching	851.0	33		TRANSMISSION	DEMAND	PDAY		
151	Communication system expenses	852.0	-						
152	Compressor station labor and expenses	853.0	5		TRANSMISSION	DEMAND	PDAY		
153	Gas for compressor station fuel	854.0	-						
154	Other fuel and power for compressor stations	855.0	-						
155	Mains expenses	856.0	662		TRANSMISSION	DEMAND	PDAY		
156	Measuring and regulating station expenses	857.0	70		TRANSMISSION	DEMAND	PDAY		
157	Transmission and compression of gas by others	858.0	40,474		GAS SUPPLY	COMMODITY		GASCOST	
158	Other expenses	859.0	46		TRANSMISSION	DEMAND	PDAY		
159	Rents	860.0	-		TRANSMISSION	DEMAND	PDAY		
160	Subtotal - Transmission Operation Expenses		41,292						
161	**Transmission Maintenance Expenses**								
162	Maintenance supervision and engineering	861.0	-						
163	Maintenance of structures and improvements	862.0	15		TRANSMISSION	DEMAND	PDAY		
164	Maintenance of mains	863.0	120		TRANSMISSION	DEMAND	PDAY		
165	Maintenance of compressor station equipment	864.0	-		TRANSMISSION	DEMAND	PDAY		
166	Maintenance of measuring and regulating station equipment	865.0	34		TRANSMISSION	DEMAND	PDAY		
167	Maintenance of communication equipment	866.0	-						
168	Maintenance of other equipment	867.0	27		TRANSMISSION	DEMAND	PDAY		
169	Subtotal - Transmission Maintenance Expenses		195						
170	**Distribution Operation Expenses**								
171	Operation supervision and engineering	870.0	6,426	INT_DIST_OL					

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Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
172	Distribution load dispatching	871.0	873		DISTRIBUTION	DEMAND	PEAK_AVRG		
173	Compressor station labor and expenses	872.0	32		DISTRIBUTION	DEMAND	PEAK_AVRG		
174	Compressor station fuel and power (major only)	873.0	-		DISTRIBUTION	DEMAND	PEAK_AVRG		
175	Mains and services expenses	874.0	4,421	INT_DMAINS_SERV					
176	Measuring and regulating station expenses—general	875.0	367		DISTRIBUTION	DEMAND	PEAK_AVRG		
177	Measuring and regulating station expenses—industrial	876.0	118		CUSTOMER	CUSTOMER			M&R
178	Measuring and regulating station expenses—city gate check stations	877.0	9		DISTRIBUTION	DEMAND	PEAK_AVRG		
179	Meter and house regulator expenses	878.0	1,007		CUSTOMER	CUSTOMER			MTRS
180	Customer installations expenses	879.0	1,132		CUSTOMER	CUSTOMER			CUST
181	Other expenses	880.0	5,408	INT_OM_DIST_SUBTOTAL					
182	Rents	881.0	122	INT_DIST_OL					
183	Subtotal - Distribution Operation Expenses		19,916						
184	**Distribution Maintenance Expenses**								
185	Maintenance supervision and engineering	885.0	837	INT_DIST_ML					
186	Maintenance of structures and improvements	886.0	931		DISTRIBUTION	DEMAND	PEAK_AVRG		
187	Maintenance of mains	887.0	1,266		DISTRIBUTION	DEMAND	PEAK_AVRG		
188	Maintenance of compressor station equipment	888.0	0		DISTRIBUTION	DEMAND	PEAK_AVRG		
189	Maintenance of measuring and regulating station equipment—general	889.0	168		DISTRIBUTION	DEMAND	PEAK_AVRG		
190	Maintenance of measuring and regulating station equipment—industrial	890.0	109		CUSTOMER	CUSTOMER			M&R
191	Maintenance of measuring and regulating station equipment—city gate	891.0	-		DISTRIBUTION	DEMAND	PEAK_AVRG		
192	Maintenance of services	892.0	308		DISTRIBUTION	CUSTOMER			SERV
193	Maintenance of meters and house regulators	893.0	484		DISTRIBUTION	CUSTOMER			MTRS
194	Maintenance of other equipment	894.0	88	INT_OM_DIST_SUBTOTAL					
195	Subtotal - Distribution Maintenance Expenses		4,191						
196	**Total Production, Storage, LNG, Transmission, and Distribution Expense**		149,869						

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Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
197	**Customer Accounts, Service, and Sales Expense**								
198	**Customer Account**								
199	Supervision	901.0	1,530	INT_CUSTACC					
200	Meter reading expenses	902.0	1,708		CUSTOMER	CUSTOMER			CUST
201	Customer records and collection expenses	903.0	8,813		CUSTOMER	CUSTOMER			CUST
202	Uncollectible accounts	904.0	3,121		CUSTOMER	CUSTOMER			ACT_904
203	Miscellaneous customer accounts expenses	905.0	808	INT_CUSTACC					
204	Subtotal - Customer Account		15,979						
205	**Customer Service & Information Expenses**								
206	Supervision	907.0	130		CUSTOMER	CUSTOMER			CUST
207	Customer assistance expenses	908.0	2,945		CUSTOMER	CUSTOMER			CUST
208	Informational and instructional advertising expenses	909.0	777		CUSTOMER	CUSTOMER			CUST
209	Miscellaneous customer service and informational expenses	910.0	740		CUSTOMER	CUSTOMER			CUST
210	Subtotal - Customer Service & Information Expenses		4,593						
211	**Sales Expenses**								
212	Supervision	911.0	-						
213	Demonstrating and selling expenses	912.0	-						
214	Advertising expenses	913.0	4		CUSTOMER	CUSTOMER			CUST
215	Miscellaneous sales expenses	916.0	-						
216	Subtotal - Sales Expenses		4						
217	**Total Customer Accounts, Service, and Sales Expense**		20,576						
218	**Administrative and General Expenses**								
219	Administrative and general salaries	920.0	14,923	INT_OML					
220	Office supplies and expenses	921.0	3,720	INT_OML					
221	Administrative expenses transferred—Credit	922.0	(1,597)	INT_OML					
222	Outside services employed	923.0	1,101	INT_OML					
223	Property insurance	924.0	113	INT_TOTPLT					
224	Injuries and damages	925.0	2,019	INT_OML					
225	Employee pensions and benefits	926.0	9,248	INT_OML					
226	Franchise requirements	927.0	-						
227	Regulatory commission expenses	928.0	2,104		CUSTOMER	CUSTOMER			REV
228	Duplicate charges—Credit	929.0	-						
229	General advertising expenses	930.1	-						
230	Miscellaneous general expenses	930.2	491	INT_DIST_SUBTOTAL					
231	Rents	931.0	1,338	INT_OML					
232	Maintenance of general plant	932.0	372	INT_DIST_SUBTOTAL					
233	Subtotal - Administrative and General Expenses		33,831						
234	**TOTAL OPERATION AND MAINTENANCE EXPENSE**		204,276						

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Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
235	**Adjustments, Depreciation and Amortization Expense**								
236	**Depreciation Expense**								
237	Depreciation expense production	403.0	146	INT_PRODPT					
238	Depreciation expense storage and terminaling	403.1	-						
239	Depreciation expense transmission	403.2	1,904	INT_TRANSPT					
240	Depreciation expense distribution	403.3	14,872	INT_DISTPT					
241	Depreciation expense general plant	403.4	6,134	INT_GENPLT					
242	Depreciation expense common	403.5	350	INT_TOTPLT					
243	Subtotal - Depreciation Expense		23,406						
244	**Amortization Expense**								
245	Amortization and depletion of producing natural gas land and land	404.1	1,896	INT_PRODPT					
246	Amortization of underground storage land and land rights	404.2	-						
247	Amortization of other limited-term gas plant	404.3	-						
248	Amortization of other gas plant	405.0	-						
249	Amortization of gas plant acquisition adjustments	406.0	-						
250	Amortization of property losses, unrecovered plant and regulatory	407.1	-						
251	Amortization of conversion expense	407.2	-						
252	Subtotal - Amortization Expense		1,896						
253	**Adjustments**								
254	Regulatory Debits	407.3	-						
255	Regulatory Credits	407.4	(228)		CUSTOMER	CUSTOMER			REV
256	Gains from disposition of utility plant	411.6	-						
257	Losses from disposition of utility plant	411.7	-						
258	Revenues from natural gas plant leased to others	412.0	-						
259	Expenses of natural gas plant leased to others	413.0	-						
260	Other utility operating income	414.0	-						
261	Subtotal - Adjustments								
262	**Total Adjustments, Depreciation and Amortization Expense**		25,074						
263	**Taxes**								
264	**Taxes Other Than Income Taxes**								
265	Taxes Other Than Income Taxes - Property	408.1	113	INT_TOTPLT					
266	Taxes Other Than Income Taxes - Payroll	408.2	2,400	INT_OML					
267	Taxes Other Than Income Taxes - Excise	408.3	(23)		CUSTOMER	CUSTOMER			REV
268	Subtotal - Taxes Other Than Income Taxes		2,490						
269	**Income Taxes**								
270	Income Taxes - federal taxes utility operating income	409.1	(1,653)	INT_REQ_INCOME					
271	Income Taxes - state taxes utility operating income	409.2	-	INT_REQ_INCOME					
272	Income Taxes - other taxes utility operating income	410.1	-						
273	Provision for deferred income taxes—credit, utility operating income	411.1	(687)	INT_TOTPLT					
274	Investment Tax credit Adj.	411.4	-						
275	Subtotal - Income Taxes		(2,340)						
276	**Total Taxes**		150						

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Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
277	**REVENUE REQUIREMENT AT EQUAL RATES OF RETURN**								
278	**Test Year Expenses at Current Rates**		229,499						
279	**Return on Rate Base**		50,185	INT_RATEBASE					
280	**Gross Up Items**								
281	Federal Income Tax		3,764	INT_REQ_INCOME					
282	State Utility Tax		1,451	INT_REQ_INCOME					
283	Bad Debts		305		CUSTOMER	CUSTOMER			ACT_904
284	Annual Filing Fee		-						
285	**TOTAL REVENUE REQUIREMENT AT EQUAL RATES OF RETURN**		**285,204**						

286	**INTERNAL ALLOCATION FACTORS**		
287	INT_PRODPT	4,522	2
288	INT_TRANSPT	106,251	1
289	INT_DISTPT	761,953	1
290	INT_GENPLT	58,721	1
291	INT_TOTPLT	957,237	6
292	INT_RATEBASE	571,582	1
293	INT_DMAINS_SERV	675,280	1
294	INT_OML	15,308	24
295	INT_DIST_OL	8,199	2
296	INT_DIST_ML	1,186	1
297	INT_CUSTACC	13,642	2
298	INT_PROD_TRANSM_DIST_SUBTOTAL	872,727	6
299	INT_DIST_SUBTOTAL	748,041	4

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Line No.	Account Description	FERC Account	Account Balance	Internal Allocation Factor	Functional Allocation Factor	Classification Allocation Factor	Demand Allocation Factor	Commodity Allocation Factor	Customer Allocation Factor
300	INT_OM_Excl_A&G		45,696	1					
301	INT_OM_DIST_SUBTOTAL		11,226	2					
302	INT_REQ_INCOME		50,185	4					
303	INT_REV_REQ		285,204	0					
304	*last line for internals*								

305	**Operating Revenue**			Revenue/Margin Allocation Factor
306	Base Rate Revenue	480/481/489	136,735	REV
			-	
			-	
307	Gas Cost Revenues	480/481/489	124,571	GASCOST
308	Forfeited Discounts	487.0	1,125	REV_DSCNT
309	Rent From Gas Property	493.0	100	INT_REV_REQ
310	Other Gas Revenues	495.0	48	INT_REV_REQ
311	Negotiated Contracts	489.0	2,945	INT_REV_REQ
			-	
			-	
			-	
			-	
			-	
			-	
			-	
			-	
312	**Total Operating Revenue**		265,524	
313	**NET INCOME**		36,024	

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SCHEDULE 2 - EXTERNAL ALLOCATION FACTORS

Allocator Code	Description	Classifier	Total	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
	CUSTOMER EXTERNAL ALLOCATORS											
CUST	**Average Number Customers**	**CUS**	**100%**	**92.1%**	**4.9%**	**2.1%**	**0.7%**	**0.0%**	**0.1%**	**0.2%**	**0.0%**	**0.0%**
			214,901	197,825	10,491	4,453	1,535	7	202	352	26	10
MTRS	**Customer Meters**	**CUS**	**100%**	**70.5%**	**8.5%**	**11.9%**	**6.4%**	**0.1%**	**0.7%**	**1.8%**	**0.2%**	**0.2%**
	Unit Cost (2025)			39	89	293	455	952	374	554	702	1,667
	Relative Weighting Factor			1.00	2.27	7.48	11.62	24.32	9.55	14.17	17.93	42.59
	Unit Cost x Customer		280,752	197,825	23,808	33,296	17,840	170	1,932	4,988	466	426
M&R	**Industrial measuring and regulating station equipment**	**CUS**	**100%**	**0.4%**	**5.0%**	**40.3%**	**16.2%**	**1.1%**	**1.0%**	**17.3%**	**13.3%**	**5.4%**
	Historical Cost		12,566,674	50,010	632,920	5,059,500	2,036,419	136,654	126,281	2,175,330	1,670,405	679,156
SERV	**Services**	**CUS**	**100%**	**92.207%**	**4.289%**	**2.140%**	**0.999%**	**0.001%**	**0.110%**	**0.214%**	**0.019%**	**0.021%**
	Unit Cost (2025)			2,450	2,149	2,526	3,423	815	2,855	3,199	3,902	10,904
	Relative Weighting Factor			1.00	0.88	1.03	1.40	0.33	1.17	1.31	1.59	4.45
	Unit Cost x Customer		214,545	197,825	9,202	4,590	2,144	2	236	460	41	45
ACT_904	Uncollectible accounts - Allocation Factor	CUS	100%	94.9%	2.4%	1.0%	0.4%	0.0%	0.5%	0.8%	0.1%	0.0%
	Uncollectible accounts - Residential		5,054,569	5,054,569								
	Uncollectible accounts - Commercial		200,209		127,406	54,078	18,640	85				
	Uncollectible accounts - Industrial		70,810						24,256	42,236	3,118	1,199
	Uncollectible accounts		5,325,588	5,054,569	127,406	54,078	18,640	85	24,256	42,236	3,118	1,199
	COMMODITY EXTERNAL ALLOCATORS											
REV	Total Sales and Transportation	REV	100%	71.2%	5.0%	5.1%	10.2%	0.1%	0.3%	4.3%	2.0%	1.8%
			136,734,674	97,367,043	6,819,476	6,988,813	13,907,541	131,245	443,729	5,876,219	2,730,253	2,470,353
REV_DSCNT	Other Revenues -Forfeited Discounts	REV	100%	90.0%	2.4%	2.2%	2.2%	0.0%	0.2%	1.3%	0.8%	1.0%
			1,151,259	1,035,802	27,403	25,484	24,922	400	1,758	14,405	9,382	11,703
GASCOST	Gas Purchase Cost	COM	100%	80.9%	4.8%	6.3%	5.3%	0.3%	0.3%	1.7%	0.2%	0.1%
			124,570,582	100,820,125	6,009,785	7,789,941	6,609,463	397,954	363,570	2,174,873	229,318	175,553
COM	Weather Normalized Volumes	COM	100%	49.6%	3.4%	5.8%	16.4%	0.2%	0.3%	8.9%	5.8%	9.7%
			38,211,546	18,958,326	1,294,228	2,201,607	6,255,510	70,034	104,599	3,390,078	2,233,913	3,703,251
SALES_COM	Weather Normalized Volumes for Sales Customers	COM	100%	83.6%	5.0%	6.3%	3.7%	0.3%	0.3%	0.8%	0.0%	0.0%
			20,647,425	17,251,535	1,035,928	1,293,560	770,067	70,034	60,192	166,107	-	-
INCR_WNTR	Incremental Winter Sales Volumes		100%	83.8%	5.1%	6.3%	3.4%	0.4%	0.4%	0.7%		
	Apr-Oct Sales Volumes		6,036,363	5,027,436	299,898	377,436	242,971	19,132	14,004	55,485		
	No. Days Apr-Oct		214	214	214	214	214	214	214	214		
	Apr-Oct Avg Daily Sales		28,207	23,493	1,401	1,764	1,135	89	65	259		
	Nov-Mar Sales Volumes		14,611,062	12,224,099	736,030	916,124	527,096	50,902	46,188	110,622		
	No. Days Nov-Mar		151	151	151	151	151	151	151	151		
	Nov-Mar Avg Daily Sales		96,762	80,954	4,874	6,067	3,491	337	306	733		
	(Incremental NOV-MAR Seasonal Sales)		68,555	57,462	3,473	4,303	2,355	248	240	473		

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SCHEDULE 2 - EXTERNAL ALLOCATION FACTORS

Allocator Code	Description	Classifier	Total	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
	DEMAND EXTERNAL ALLOCATORS											
PDAY	Peak Day (Design Day) 62DD	DEM	100%	58.8%	3.7%	6.8%	17.9%	0.4%	0.2%	6.7%	2.3%	3.2%
			400,571	235,420	14,868	27,425	71,665	1,645	966	26,744	9,028	12,810
PEAK_AVRG	Peak and Average	DEM	100%	54.2%	3.5%	6.3%	17.1%	0.3%	0.3%	7.8%	4.0%	6.4%
			1	54.2%	3.5%	6.3%	17.1%	0.3%	0.3%	7.8%	4.0%	6.4%
CUST_DEM	Customer and Demand Composite Factor	DEM	100.0%	79.0%	4.4%	3.9%	7.4%	0.2%	0.2%	2.7%	0.9%	1.3%
	CUST		1.0000	0.9205	0.0488	0.0207	0.0071	0.0000	0.0009	0.0016	0.0001	0.0000
	CUST Customer Component	61%	0.6087	0.5603	0.0297	0.0126	0.0043	0.0000	0.0006	0.0010	0.0001	0.0000
	PDAY		1.0000	0.5877	0.0371	0.0685	0.1789	0.0041	0.0024	0.0668	0.0225	0.0320
	PDAY Demand Components	39%	0.3913	0.2300	0.0145	0.0268	0.0700	0.0016	0.0009	0.0261	0.0088	0.0125

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SCHEDULE 3 - INTERNAL ALLOCATION FACTORS

Allocator Code	Total	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
ALLOCATION FACTOR BASIS										
INT_PRODPT	4,522	3,779	227	283	169	15	13	36	-	-
INT_TRANSPT	106,251	62,445	3,944	7,274	19,009	436	256	7,094	2,395	3,398
INT_DISTPT	761,953	501,300	30,220	45,763	87,383	1,627	1,835	40,807	21,715	31,304
INT_GENPLT	58,721	40,004	2,710	3,768	5,996	108	166	2,681	1,347	1,941
INT_TOTPLT	957,237	625,096	38,292	58,744	115,191	2,234	2,343	51,795	26,048	37,495
INT_RATEBASE	571,582	367,968	22,564	35,196	71,637	1,398	1,406	32,040	16,026	23,347
INT_DMAINS_SERV	675,280	459,599	25,613	32,221	76,079	1,279	1,361	33,928	17,449	27,752
INT_OML	15,308	10,428	707	982	1,563	28	43	699	351	506
INT_DIST_OL	8,199	5,658	381	515	801	14	23	360	183	264
INT_DIST_ML	1,186	758	54	86	139	3	4	63	33	46
INT_CUSTACC	13,642	12,647	588	250	86	0	24	42	3	1
INT_PROD_TRANSM_DIST_SUBTOTAL	872,727	567,524	34,391	53,321	106,561	2,078	2,104	47,937	24,110	34,702
INT_DIST_SUBTOTAL	748,041	492,147	29,669	44,928	85,788	1,597	1,801	40,062	21,319	30,732
INT_OM_Excl_A&G	45,696	35,663	2,043	2,030	2,937	52	104	1,312	635	920
INT_OM_DIST_SUBTOTAL	11,226	7,363	503	739	1,266	23	32	574	295	431
INT_REQ_INCOME	50,185	32,308	1,981	3,090	6,290	123	123	2,813	1,407	2,050
INT_REV_REQ	285,204	212,708	12,890	16,956	22,699	704	767	9,357	3,798	5,326
ALLOCATION FACTOR										
INT_PRODPT	100%	84%	5%	6%	4%	0%	0%	1%	0%	0%
INT_TRANSPT	100%	59%	4%	7%	18%	0%	0%	7%	2%	3%
INT_DISTPT	100%	66%	4%	6%	11%	0%	0%	5%	3%	4%
INT_GENPLT	100%	68%	5%	6%	10%	0%	0%	5%	2%	3%
INT_TOTPLT	100%	65%	4%	6%	12%	0%	0%	5%	3%	4%
INT_RATEBASE	100%	64%	4%	6%	13%	0%	0%	6%	3%	4%
INT_DMAINS_SERV	100%	68%	4%	5%	11%	0%	0%	5%	3%	4%
INT_OML	100%	68%	5%	6%	10%	0%	0%	5%	2%	3%
INT_DIST_OL	100%	69%	5%	6%	10%	0%	0%	4%	2%	3%
INT_DIST_ML	100%	64%	5%	7%	12%	0%	0%	5%	3%	4%
INT_CUSTACC	100%	93%	4%	2%	1%	0%	0%	0%	0%	0%
INT_PROD_TRANSM_DIST_SUBTOTAL	100%	65%	4%	6%	12%	0%	0%	5%	3%	4%
INT_DIST_SUBTOTAL	100%	66%	4%	6%	11%	0%	0%	5%	3%	4%
INT_OM_Excl_A&G	100%	78%	4%	4%	6%	0%	0%	3%	1%	2%
INT_OM_DIST_SUBTOTAL	100%	66%	4%	7%	11%	0%	0%	5%	3%	4%
INT_REQ_INCOME	100%	64%	4%	6%	13%	0%	0%	6%	3%	4%
INT_REV_REQ	100%	75%	5%	6%	8%	0%	0%	3%	1%	2%

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study under Peak & Average
Test Year Ending October 31, 2027
SCHEDULE 4 - COMPARISON OF COST OF SERVICE WITH REVENUES UNDER PRESENT AND PROPOSED RATES
($ in thousands)

Pro Forma Revenues with Cost of Gas and Other Revenues

Service Classification	Pro Forma Cost of Service Amount	Pro Forma Cost of Service Percent	Under Present Rates Amount	Under Present Rates Percent	Under Proposed Rates Amount	Under Proposed Rates Percent	Revenue Increase Amount	Revenue Increase Percent
Residential Service	$ 209,377	74.5%	$ 198,187	75.8%	$ 213,591	76.0%	$ 15,404	7.8%
Small Commercial & PA Service (LE 250)	12,722	4.5%	12,829	4.9%	13,712	4.9%	$ 883	6.9%
Small Commercial & PA Service (GT 250)	16,746	6.0%	14,779	5.7%	15,683	5.6%	$ 905	6.1%
Large Comm PA Service	22,427	8.0%	20,517	7.9%	21,859	7.8%	$ 1,342	6.5%
NGV	696	0.2%	529	0.2%	550	0.2%	$ 21	3.9%
SVIS	757	0.3%	807	0.3%	850	0.3%	$ 43	5.3%
IVIS	9,241	3.3%	8,051	3.1%	8,618	3.1%	$ 567	7.0%
LVIS	3,747	1.3%	2,960	1.1%	3,223	1.1%	$ 263	8.9%
LIS	5,257	1.9%	2,646	1.0%	2,884	1.0%	$ 238	9.0%
Total System	**$ 280,970**	100.0%	**$ 261,305**	100.0%	**$ 280,970**	100.0%	**$ 19,665**	7.5%
Other Revenues	4,234		4,219		4,234		$ 15	0.4%
Total	**285,204**		**265,524**		**285,204**		**19,681**	7.4%

Pro Forma Margin Revenues

Service Classification	Pro Forma Cost of Service Amount	Pro Forma Cost of Service Percent	Under Present Rates Amount	Under Present Rates Percent	Under Proposed Rates Amount	Under Proposed Rates Percent	Revenue Increase Amount	Revenue Increase Percent
Residential Service	$ 108,557	69.4%	$ 97,367	71.2%	$ 112,771	72.1%	$ 15,404	15.8%
Small Commercial & PA Service (LE 250)	6,712	4.3%	6,819	5.0%	$ 7,702	4.9%	$ 883	12.9%
Small Commercial & PA Service (GT 250)	8,956	5.7%	6,989	5.1%	$ 7,893	5.0%	$ 905	12.9%
Large Comm PA Service	15,817	10.1%	13,908	10.2%	$ 15,249	9.8%	$ 1,342	9.6%
NGV	298	0.2%	131	0.1%	$ 152	0.1%	$ 21	15.8%
SVIS	393	0.3%	444	0.3%	$ 487	0.3%	$ 43	9.6%
IVIS	7,066	4.5%	5,876	4.3%	$ 6,443	4.1%	$ 567	9.6%
LVIS	3,518	2.2%	2,730	2.0%	$ 2,994	1.9%	$ 263	9.6%
LIS	5,081	3.2%	2,470	1.8%	$ 2,709	1.7%	$ 238	9.6%
Total System	**$ 156,400**	100.0%	**$ 136,735**	100.0%	**$ 156,400**	100.0%	**$ 19,665**	14.38%
Other Revenues	4,234		4,219		4,234		$ 15	0.4%
Total	**160,634**		**140,953**		**160,634**		**19,681**	14.0%

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study under Peak & Average
Test Year Ending October 31, 2027
SCHEDULE 5 – COST OF SERVICE AND RATE OF RETURN UNDER PRESENT AND PROPOSED RATES
($ in thousands)

Exhibit JDT-19-R-A

Line No.	Revenue Requirement Summary	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
1	**Rate Base**										
2	Plant in Service	$ 957,237	$ 625,096	$ 38,292	$ 58,744	$ 115,191	$ 2,234	$ 2,343	$ 51,795	$ 26,048	$ 37,495
3	Accumulated Reserve	(320,571)	(215,012)	(13,165)	(19,675)	(35,504)	(696)	(790)	(16,095)	(8,162)	(11,472)
4	Other Rate Base Items	(65,085)	(42,116)	(2,563)	(3,873)	(8,050)	(140)	(147)	(3,661)	(1,860)	(2,676)
5	**Total Rate Base**	**$ 571,582**	**$ 367,968**	**$ 22,564**	**$ 35,196**	**$ 71,637**	**$ 1,398**	**$ 1,406**	**$ 32,040**	**$ 16,026**	**$ 23,347**
6	**Rate of Return Under Current ROR**										
7	**Revenue at Current Rates**										
8	Gas Service Revenue	$ 136,735	$ 97,367	$ 6,819	$ 6,989	$ 13,908	$ 131	$ 444	$ 5,876	$ 2,730	$ 2,470
9	Gas Cost	124,571	100,820	6,010	7,790	6,609	398	364	2,175	229	176
10	Other Revenues	4,219	3,319	167	209	271	8	10	116	50	69
11	**Total Revenue**	**$ 265,524**	**$ 201,507**	**$ 12,996**	**$ 14,988**	**$ 20,788**	**$ 537**	**$ 817**	**$ 8,167**	**$ 3,010**	**$ 2,715**
12	**Expenses at Current Rates**										
13	O&M and A&G Expenses	$ 204,276	$ 159,720	$ 9,625	$ 11,971	$ 13,020	$ 511	$ 564	$ 5,035	$ 1,640	$ 2,190
14	Depreciation and Amortization Expense	25,074	16,855	1,049	1,555	2,768	58	64	1,229	612	884
15	Taxes Other Than Income	2,490	1,692	114	160	256	5	7	115	58	83
16	**Total Operating Expenses**	231,839	178,267	10,788	13,685	16,044	574	635	6,379	2,310	3,158
17	**Earnings Before Interest and Taxes**	**33,684**	**23,240**	**2,208**	**1,302**	**4,743**	**(37)**	**182**	**1,788**	**700**	**(443)**
18	Current Federal/State Income Taxes	(1,653)	(1,140)	(108)	(64)	(233)	2	(9)	(88)	(34)	22
19	Deferred Income Tax	(687)	(449)	(27)	(42)	(83)	(2)	(2)	(37)	(19)	(27)
20	**Total Income Taxes**	**(2,340)**	**(1,589)**	**(136)**	**(106)**	**(315)**	**0**	**(11)**	**(125)**	**(53)**	**(5)**
21	**Total Expenses at Current Rates**	**$ 229,499**	**$ 176,678**	**$ 10,652**	**$ 13,579**	**$ 15,729**	**$ 574**	**$ 624**	**$ 6,254**	**$ 2,257**	**$ 3,153**
22	**Operating Income at Current Rates**	**$ 36,024**	**$ 24,829**	**$ 2,344**	**$ 1,408**	**$ 5,059**	**$ (37)**	**$ 193**	**$ 1,913**	**$ 753**	**$ (438)**
23	**Current Rate of Return**	**6.30%**	**6.75%**	**10.39%**	**4.00%**	**7.06%**	**-2.65%**	**13.72%**	**5.97%**	**4.70%**	**-1.87%**
24	**Relative Rate of Return**	**1.00**	**1.07**	**1.65**	**0.63**	**1.12**	**(0.42)**	**2.18**	**0.95**	**0.75**	**(0.30)**

National Fuel Gas Distribution Corporation

Exhibit JDT-19-R-A

Gas Class Cost of Service Study under Peak & Average

Test Year Ending October 31, 2027

SCHEDULE 5 – COST OF SERVICE AND RATE OF RETURN UNDER PRESENT AND PROPOSED RATES

($ in thousands)

Line No.	Revenue Requirement Summary	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
25	**Rate of Return Under Proposed ROR**										
26	**Revenue at Proposed ROR**										
27	Gas Service Revenue	$ 156,400	$ 112,771	$ 7,702	$ 7,893	$ 15,249	$ 152	$ 487	$ 6,443	$ 2,994	$ 2,709
28	Gas Cost	$ 124,571	$ 100,820	$ 6,010	$ 7,790	$ 6,609	$ 398	$ 364	$ 2,175	$ 229	$ 176
29	Other Revenues	$ 4,234	$ 3,331	$ 167	$ 210	$ 272	$ 8	$ 10	$ 116	$ 51	$ 69
30	**Total Revenue**	**$ 285,204**	**$ 216,922**	**$ 13,879**	**$ 15,893**	**$ 22,131**	**$ 558**	**$ 860**	**$ 8,734**	**$ 3,274**	**$ 2,954**
31	**Expenses at Required Return**										
32	O&M and A&G Expenses	204,276	159,720	9,625	11,971	13,020	511	564	5,035	1,640	2,190
33	Depreciation and Amortization Expense	25,379	17,144	1,056	1,558	2,769	58	65	1,232	613	884
34	Taxes Other Than Income	2,490	1,692	114	160	256	5	7	115	58	83
35	**Total Operating Expenses**	**232,144**	**178,556**	**10,795**	**13,688**	**16,045**	**574**	**636**	**6,381**	**2,310**	**3,158**
36	Current Federal/State Income Taxes	3,562	2,572	206	149	409	(1)	15	158	65	(12)
37	Deferred Income Tax	(687)	(449)	(27)	(42)	(83)	(2)	(2)	(37)	(19)	(27)
38	**Income Taxes and Other**	**2,875**	**2,124**	**179**	**107**	**326**	**(3)**	**13**	**121**	**46**	**(39)**
39	**Total Expenses at Required Return**	**$ 235,019**	**$ 180,680**	**$ 10,974**	**$ 13,795**	**$ 16,371**	**$ 571**	**$ 650**	**$ 6,502**	**$ 2,356**	**$ 3,119**
40	**Operating Income at Equal ROR**	50,185	36,242	2,905	2,098	5,759	(13)	211	2,232	917	(166)
41	**Current Rate of Return**	**8.78%**	**9.85%**	**12.88%**	**5.96%**	**8.04%**	**-0.96%**	**14.97%**	**6.97%**	**5.72%**	**-0.71%**
42	**Relative Rate of Return**	**1.00**	**1.12**	**1.47**	**0.68**	**0.92**	**(0.11)**	**1.71**	**0.79**	**0.65**	**(0.08)**

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study under Peak & Average
Test Year Ending October 31, 2027
SCHEDULE 6 - COST OF SERVICE ALLOCATION STUDY FULLY PROJECTED FUTURE TEST YEAR
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
1	**RATE BASE**											
2	**Plant in Service**											
3	**Intangible Plant**											
4	Organization	301	-	-	-	-	-	-	-	-	-	-
5	Franchises & Consents	302	-	-	-	-	-	-	-	-	-	-
6	Misc. Intangible Plant	303	25,789	17,569	1,190	1,655	2,633	48	73	1,177	592	852
7	Subtotal - Intangible Plant		25,789	17,569	1,190	1,655	2,633	48	73	1,177	592	852
8	**Natural Gas Production Plant**											
9	Land and Land Rights	325	60	50	3	4	2	0	0	0	-	-
10	Structures and Improvements	328	12	10	1	1	0	0	0	0	-	-
11	Mains	329	3	3	0	0	0	0	0	0	-	-
12	Lines	332	533	445	27	33	20	2	2	4	-	-
13	Measuring and Regulating Equipment	334	3,914	3,271	196	245	146	13	11	31	-	-
14	Subtotal - Natural Gas Production Plant		4,522	3,779	227	283	169	15	13	36	-	-
15	**Transmission plant**											
16	Land and Land Rights	365.1	-	-	-	-	-	-	-	-	-	-
17	Rights-of-Way	365.2	3,363	1,976	125	230	602	14	8	225	76	108
18	Structures and improvements	366	306	180	11	21	55	1	1	20	7	10
19	Mains	367	92,168	54,168	3,421	6,310	16,489	378	222	6,154	2,077	2,948
20	Measuring and regulating station equipment	369	10,415	6,121	387	713	1,863	43	25	695	235	333
21	Subtotal - Transmission plant		106,251	62,445	3,944	7,274	19,009	436	256	7,094	2,395	3,398
22	**Distribution Plant**											
23	Land and land rights	374	17,091	9,262	607	1,077	2,928	51	44	1,329	692	1,101
24	Structures and improvements	375	13,912	9,153	552	836	1,595	30	33	745	396	572
25	Mains	376	429,663	232,846	15,250	27,086	73,604	1,276	1,106	33,403	17,401	27,691
26	Measuring and regulating station equipment—general	378	11,812	6,401	419	745	2,023	35	30	918	478	761
27	Measuring and regulating station equipment—city gate check stat	379	-	-	-	-	-	-	-	-	-	-
28	Services	380	245,617	226,753	10,362	5,135	2,474	3	255	525	47	61
29	Meters	381	18,771	13,227	1,592	2,226	1,193	11	129	334	31	28
30	Meter installations	382	3,769	2,656	320	447	240	2	26	67	6	6
31	House regulators	383	-	-	-	-	-	-	-	-	-	-
32	House regulatory installations	384	1,311	923	111	155	83	1	9	23	2	2
33	Industrial measuring and regulating station equipment	385	20,008	80	1,008	8,056	3,242	218	201	3,463	2,660	1,081
34	Subtotal - Distribution Plant		761,953	501,300	30,220	45,763	87,383	1,627	1,835	40,807	21,715	31,304
35	**General Plant**											
36	Land and Land Rights	389	-	-	-	-	-	-	-	-	-	-
37	Structures and Improvements	390	1,444	983	67	93	147	3	4	66	33	48
38	Office Furniture and Equipment	391	9,989	6,805	461	641	1,020	18	28	456	229	330
39	Transportation Equipment	392	17,271	11,766	797	1,108	1,764	32	49	789	396	571
40	Tools, Shop, and Garage Equipment	394	12,168	8,289	562	781	1,243	22	34	556	279	402
41	Laboratory Equipment	395	-	-	-	-	-	-	-	-	-	-
42	Power Operated Equipment	396	12,847	8,752	593	824	1,312	24	36	587	295	425
43	Communication Equipment	397	5,002	3,408	231	321	511	9	14	228	115	165
44	Misc. Equipment	398	-	-	-	-	-	-	-	-	-	-
45	Other Intangible Property	399	-	-	-	-	-	-	-	-	-	-
46	Subtotal - General Plant		58,721	40,004	2,710	3,768	5,996	108	166	2,681	1,347	1,941
47	**Total Plant in Service**		957,237	625,096	38,292	58,744	115,191	2,234	2,343	51,795	26,048	37,495

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study under Peak & Average
Test Year Ending October 31, 2027
SCHEDULE 6 - COST OF SERVICE ALLOCATION STUDY FULLY PROJECTED FUTURE TEST YEAR
($ in thousands)

Line No.	Account Description	FERC Account	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
48	**Accumulated Depreciation & Amortization Expense**											
49	**Intangible Plant**											
50	Organization	301	-	-	-	-	-	-	-	-	-	-
51	Franchises & Consents	302	-	-	-	-	-	-	-	-	-	-
52	Misc. Intangible Plant	303	(22,959)	(15,641)	(1,060)	(1,473)	(2,344)	(42)	(65)	(1,048)	(527)	(759)
53	Subtotal - Intangible Plant		(22,959)	(15,641)	(1,060)	(1,473)	(2,344)	(42)	(65)	(1,048)	(527)	(759)
54	**Natural Gas Production Plant**											
55	Land and Land Rights	325	(35)	(29)	(2)	(2)	(1)	(0)	(0)	(0)	-	-
56	Structures and Improvements	328	(10)	(8)	(0)	(1)	(0)	(0)	(0)	(0)	-	-
57	Mains	329	(1)	(1)	(0)	(0)	(0)	(0)	(0)	(0)	-	-
58	Lines	332	(175)	(146)	(9)	(11)	(7)	(1)	(1)	(1)	-	-
59	Measuring and Regulating Equipment	334	(1,777)	(1,484)	(89)	(111)	(66)	(6)	(5)	(14)	-	-
60	Subtotal - Natural Gas Production Plant		(1,998)	(1,669)	(100)	(125)	(75)	(7)	(6)	(16)	-	-
61	**Transmission plant**											
62	Land and Land Rights	365.1	-	-	-	-	-	-	-	-	-	-
63	Rights-of-Way	365.2	(699)	(411)	(26)	(48)	(125)	(3)	(2)	(47)	(16)	(22)
64	Structures and improvements	366	(125)	(73)	(5)	(9)	(22)	(1)	(0)	(8)	(3)	(4)
65	Mains	367	(23,289)	(13,687)	(864)	(1,594)	(4,167)	(96)	(56)	(1,555)	(525)	(745)
66	Measuring and regulating station equipment	369	(4,442)	(2,611)	(165)	(304)	(795)	(18)	(11)	(297)	(100)	(142)
67	Subtotal - Transmission plant		(28,555)	(16,782)	(1,060)	(1,955)	(5,109)	(117)	(69)	(1,906)	(644)	(913)
68	**Distribution Plant**											
69	Land and land rights	374	(3,405)	(1,845)	(121)	(215)	(583)	(10)	(9)	(265)	(138)	(219)
70	Structures and improvements	375	(6,914)	(4,549)	(274)	(415)	(793)	(15)	(17)	(370)	(197)	(284)
71	Mains	376	(121,367)	(65,772)	(4,308)	(7,651)	(20,791)	(360)	(312)	(9,435)	(4,915)	(7,822)
72	Measuring and regulating station equipment—general	378	(4,610)	(2,498)	(164)	(291)	(790)	(14)	(12)	(358)	(187)	(297)
73	Measuring and regulating station equipment—city gate check stat	379	-	-	-	-	-	-	-	-	-	-
74	Services	380	(91,472)	(84,446)	(3,859)	(1,912)	(921)	(1)	(95)	(195)	(18)	(23)
75	Meters	381	(7,080)	(4,989)	(600)	(840)	(450)	(4)	(49)	(126)	(12)	(11)
76	Meter installations	382	(1,965)	(1,385)	(167)	(233)	(125)	(1)	(14)	(35)	(3)	(3)
77	House regulators	383	-	-	-	-	-	-	-	-	-	-
78	House regulatory installations	384	(620)	(437)	(53)	(74)	(39)	(0)	(4)	(11)	(1)	(1)
79	Industrial measuring and regulating station equipment	385	(7,654)	(30)	(386)	(3,082)	(1,240)	(83)	(77)	(1,325)	(1,017)	(414)
80	Subtotal - Distribution Plant		(245,087)	(165,952)	(9,931)	(14,712)	(25,733)	(489)	(588)	(12,121)	(6,488)	(9,074)
81	**General Plant**											
82	Land and Land Rights	389	-	-	-	-	-	-	-	-	-	-
83	Structures and Improvements	390	(157)	(107)	(7)	(10)	(16)	(0)	(0)	(7)	(4)	(5)
84	Office Furniture and Equipment	391	(5,423)	(3,694)	(250)	(348)	(554)	(10)	(15)	(248)	(124)	(179)
85	Transportation Equipment	392	(8,518)	(5,803)	(393)	(547)	(870)	(16)	(24)	(389)	(195)	(282)
86	Tools, Shop, and Garage Equipment	394	(2,723)	(1,855)	(126)	(175)	(278)	(5)	(8)	(124)	(62)	(90)
87	Laboratory Equipment	395	-	-	-	-	-	-	-	-	-	-
88	Power Operated Equipment	396	(3,401)	(2,317)	(157)	(218)	(347)	(6)	(10)	(155)	(78)	(112)
89	Communication Equipment	397	(1,751)	(1,193)	(81)	(112)	(179)	(3)	(5)	(80)	(40)	(58)
90	Misc. Equipment	398	-	-	-	-	-	-	-	-	-	-
91	Other Intangible Property	399	-	-	-	-	-	-	-	-	-	-
92	Subtotal - General Plant		(21,972)	(14,968)	(1,014)	(1,410)	(2,244)	(40)	(62)	(1,003)	(504)	(726)
93	**Total Accumulated Depreciation & Amortization Expense**		(320,571)	(215,012)	(13,165)	(19,675)	(35,504)	(696)	(790)	(16,095)	(8,162)	(11,472)

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Line No.	Account Description	FERC Account	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
94	**Other Rate Base Items**											
95	Materials And Supplies	154	1,587	1,032	63	97	194	4	4	87	44	63
96	Stores Expense Undistributed	163	-	-	-	-	-	-	-	-	-	-
97	Gas Stored Underground - PA	164.1	5,664	4,747	287	356	195	20	20	39	-	-
98	Gas owed to system gas	117.4	-	-	-	-	-	-	-	-	-	-
99	Prepayments	165	1,080	705	43	66	130	3	3	58	29	42
100	Customer deposits	235	(5,166)	(4,756)	(252)	(107)	(37)	(0)	(5)	(8)	(1)	(0)
101	Accumulated deferred income taxes—other property	282	(73,925)	(48,275)	(2,957)	(4,537)	(8,896)	(173)	(181)	(4,000)	(2,012)	(2,896)
102	Working capital allowance	N/A	5,675	4,429	254	252	365	6	13	163	79	114
103	Subtotal - Other Rate Base Items		(65,085)	(42,116)	(2,563)	(3,873)	(8,050)	(140)	(147)	(3,661)	(1,860)	(2,676)
104	**TOTAL RATE BASE**		571,582	367,968	22,564	35,196	71,637	1,398	1,406	32,040	16,026	23,347
105	**OPERATION AND MAINTENANCE EXPENSE**											
106	**Production, Storage, LNG, Transmission, and Distribution Expense**											
107	**Manufactured Gas Production Expense**											
108	Operation Supv & Engineering	750	0.01	0	0	0	0	0	0	0	-	-
109	Field Line Expenses	753	19.97	17	1	1	1	0	0	0	-	-
110	Field Compressor St Expenses	754	3.04	3	0	0	0	0	0	0	-	-
111	Measuring & Regulator Expenses	756	0.40	0	0	0	0	0	0	0	-	-
112	Purification Expenses	757	0.79	1	0	0	0	0	0	0	-	-
113	Other Expenses	759	(0.02)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	-	-
114	Maint Structures & Improvement	762	-	-	-	-	-	-	-	-	-	-
115	Maint Field Lines	764	-	-	-	-	-	-	-	-	-	-
116	Maint Field Meas & Reg Sta Eq	766	(0.28)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	-	-
117	Maint Purification Equipment	767	0.01	0	0	0	0	0	0	0	-	-
118	Maint Other Equipment	769	4.60	4	0	0	0	0	0	0	-	-
119	Subtotal - Manufactured Gas Production Expense		29	24	1	2	1	0	0	0	-	-

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Line No.	Account Description	FERC Account	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
120	**Other Gas Supply Expenses**											
121	Natural gas field line purchases	801	65,714	53,185	3,170	4,109	3,487	210	192	1,147	121	93
122	Natural gas city gate purchases	804	54	43	3	3	3	0	0	1	0	0
123	Exchange gas	806	573	464	28	36	30	2	2	10	1	1
124	Well expenses—Purchased gas	807.1	189	158	9	12	7	1	1	2	-	-
125	Operation of purchased gas measuring stations.	807.2	-	-	-	-	-	-	-	-	-	-
126	Maintenance of purchased gas measuring stations.	807.3	-	-	-	-	-	-	-	-	-	-
127	Purchased gas calculations expenses.	807.4	-	-	-	-	-	-	-	-	-	-
128	Other purchased gas expenses.	807.5	-	-	-	-	-	-	-	-	-	-
129	Gas withdrawn from storage—debit	808.1	42,369	34,291	2,044	2,649	2,248	135	124	740	78	60
130	Gas delivered to storage—credit	808.2	(41,357)	(33,472)	(1,995)	(2,586)	(2,194)	(132)	(121)	(722)	(76)	(58)
131	Gas used for other utility operations—credit	812	(39)	(33)	(2)	(2)	(1)	(0)	(0)	(0)	-	-
132	Subtotal - Other Gas Supply Expenses		67,501	54,635	3,257	4,221	3,579	216	197	1,177	124	95
133	**Underground Storage Expenses - Operation**											
134	Operation supervision and engineering	814	-	-	-	-	-	-	-	-	-	-
135	Maps and records	815	-	-	-	-	-	-	-	-	-	-
136	Wells expenses	816	-	-	-	-	-	-	-	-	-	-
137	Lines expenses	817	-	-	-	-	-	-	-	-	-	-
138	Compressor station expenses	818	-	-	-	-	-	-	-	-	-	-
139	Compressor station fuel and power	819	-	-	-	-	-	-	-	-	-	-
140	Measuring and regulating station expenses	820	-	-	-	-	-	-	-	-	-	-
141	Purification expenses	821	-	-	-	-	-	-	-	-	-	-
142	Exploration and development	822	-	-	-	-	-	-	-	-	-	-
143	Gas losses	823	-	-	-	-	-	-	-	-	-	-
144	Other expenses	824	-	-	-	-	-	-	-	-	-	-
145	Storage well royalties	825	-	-	-	-	-	-	-	-	-	-
146	Rents	826	16,746	13,553	808	1,047	888	53	49	292	31	24
147	Subtotal - Underground Storage Expenses - Operation		16,746	13,553	808	1,047	888	53	49	292	31	24
148	**Transmission Operation Expenses**											
149	Operation supervision and engineering	850	2	1	0	0	0	0	0	0	0	0
150	System control and load dispatching	851	33	20	1	2	6	0	0	2	1	1
151	Communication system expenses	852	-	-	-	-	-	-	-	-	-	-
152	Compressor station labor and expenses	853	5	3	0	0	1	0	0	0	0	0
153	Gas for compressor station fuel	854	-	-	-	-	-	-	-	-	-	-
154	Other fuel and power for compressor stations	855	-	-	-	-	-	-	-	-	-	-
155	Mains expenses	856	662	389	25	45	118	3	2	44	15	21
156	Measuring and regulating station expenses	857	70	41	3	5	12	0	0	5	2	2
157	Transmission and compression of gas by others	858	40,474	32,757	1,953	2,531	2,147	129	118	707	75	57
158	Other expenses	859	46	27	2	3	8	0	0	3	1	1
159	Rents	860	-	-	-	-	-	-	-	-	-	-
160	Subtotal - Transmission Operation Expenses		41,292	33,238	1,983	2,587	2,294	133	120	761	93	83
161	**Transmission Maintenance Expenses**											
162	Maintenance supervision and engineering	861	-	-	-	-	-	-	-	-	-	-
163	Maintenance of structures and improvements	862	15	9	1	1	3	0	0	1	0	0
164	Maintenance of mains	863	120	70	4	8	21	0	0	8	3	4
165	Maintenance of compressor station equipment	864	-	-	-	-	-	-	-	-	-	-
166	Maintenance of measuring and regulating station equipment	865	34	20	1	2	6	0	0	2	1	1
167	Maintenance of communication equipment	866	-	-	-	-	-	-	-	-	-	-
168	Maintenance of other equipment	867	27	16	1	2	5	0	0	2	1	1
169	Subtotal - Transmission Maintenance Expenses		195	115	7	13	35	1	0	13	4	6

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Line No.	Account Description	FERC Account	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
170	**Distribution Operation Expenses**											
171	Operation supervision and engineering	870	6,426	4,435	299	403	627	11	18	282	143	207
172	Distribution load dispatching	871	873	473	31	55	150	3	2	68	35	56
173	Compressor station labor and expenses	872	32	18	1	2	6	0	0	3	1	2
174	Compressor station fuel and power (major only)	873	-	-	-	-	-	-	-	-	-	-
175	Mains and services expenses	874	4,421	3,009	168	211	498	8	9	222	114	182
176	Measuring and regulating station expenses—general	875	367	199	13	23	63	1	1	29	15	24
177	Measuring and regulating station expenses—industrial	876	118	0	6	48	19	1	1	20	16	6
178	Measuring and regulating station expenses—city gate check static	877	9	5	0	1	1	0	0	1	0	1
179	Meter and house regulator expenses	878	1,007	710	85	119	64	1	7	18	2	2
180	Customer installations expenses	879	1,132	1,042	55	23	8	0	1	2	0	0
181	Other expenses	880	5,408	3,547	242	356	610	11	16	277	142	208
182	Rents	881	122	84	6	8	12	0	0	5	3	4
183	Subtotal - Distribution Operation Expenses		19,916	13,522	907	1,250	2,058	36	55	926	472	691
184	**Distribution Maintenance Expenses**											
185	Maintenance supervision and engineering	885	837	535	38	61	98	2	3	45	23	33
186	Maintenance of structures and improvements	886	931	505	33	59	159	3	2	72	38	60
187	Maintenance of mains	887	1,266	686	45	80	217	4	3	98	51	82
188	Maintenance of compressor station equipment	888	0	0	0	0	0	0	0	0	0	0
189	Maintenance of measuring and regulating station equipment—ge	889	168	91	6	11	29	1	0	13	7	11
190	Maintenance of measuring and regulating station equipment—inc	890	109	0	6	44	18	1	1	19	15	6
191	Maintenance of measuring and regulating station equipment—cit	891	-	-	-	-	-	-	-	-	-	-
192	Maintenance of services	892	308	285	13	6	3	0	0	1	0	0
193	Maintenance of meters and house regulators	893	484	341	41	57	31	0	3	9	1	1
194	Maintenance of other equipment	894	88	57	4	6	10	0	0	4	2	3
195	Subtotal - Distribution Maintenance Expenses		4,191	2,500	186	324	564	10	14	261	137	195
196	**Total Production, Storage, LNG, Transmission, and Distribution Ex**		149,869	117,586	7,149	9,444	9,420	450	435	3,431	860	1,094

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Line No.	Account Description	FERC Account	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
197	**Customer Accounts, Service, and Sales Expense**											
198	**Customer Account**											
199	Supervision	901	1,530	1,418	66	28	10	0	3	5	0	0
200	Meter reading expenses	902	1,708	1,572	83	35	12	0	2	3	0	0
201	Customer records and collection expenses	903	8,813	8,112	430	183	63	0	8	14	1	0
202	Uncollectible accounts	904	3,121	2,962	75	32	11	0	14	25	2	1
203	Miscellaneous customer accounts expenses	905	808	749	35	15	5	0	1	2	0	0
204	Subtotal - Customer Account		15,979	14,814	689	292	101	0	28	49	4	1
205	**Customer Service & Information Expenses**											
206	Supervision	907	130	119	6	3	1	0	0	0	0	0
207	Customer assistance expenses	908	2,945	2,711	144	61	21	0	3	5	0	0
208	Informational and instructional advertising expenses	909	777	716	38	16	6	0	1	1	0	0
209	Miscellaneous customer service and informational expenses	910	740	681	36	15	5	0	1	1	0	0
210	Subtotal - Customer Service & Information Expenses		4,593	4,228	224	95	33	0	4	8	1	0
211	**Sales Expenses**											
212	Supervision	911	-	-	-	-	-	-	-	-	-	-
213	Demonstrating and selling expenses	912	-	-	-	-	-	-	-	-	-	-
214	Advertising expenses	913	4	3	0	0	0	0	0	0	0	0
215	Miscellaneous sales expenses	916	-	-	-	-	-	-	-	-	-	-
216	Subtotal - Sales Expenses		4	3	0	0	0	0	0	0	0	0
217	**Total Customer Accounts, Service, and Sales Expense**		20,576	19,045	913	388	134	1	33	57	4	2
218	**Administrative and General Expenses**											
219	Administrative and general salaries	920	14,923	10,166	689	958	1,524	28	42	681	342	493
220	Office supplies and expenses	921	3,720	2,534	172	239	380	7	11	170	85	123
221	Administrative expenses transferred—Credit	922	(1,597)	(1,088)	(74)	(102)	(163)	(3)	(5)	(73)	(37)	(53)
222	Outside services employed	923	1,101	750	51	71	112	2	3	50	25	36
223	Property insurance	924	113	74	5	7	14	0	0	6	3	4
224	Injuries and damages	925	2,019	1,375	93	130	206	4	6	92	46	67
225	Employee pensions and benefits	926	9,248	6,300	427	593	944	17	26	422	212	306
226	Franchise requirements	927	-	-	-	-	-	-	-	-	-	-
227	Regulatory commission expenses	928	2,104	1,498	105	108	214	2	7	90	42	38
228	Duplicate charges—Credit	929	-	-	-	-	-	-	-	-	-	-
229	General advertising expenses	930.1	-	-	-	-	-	-	-	-	-	-
230	Miscellaneous general expenses	930.2	491	323	19	30	56	1	1	26	14	20
231	Rents	931	1,338	912	62	86	137	2	4	61	31	44
232	Maintenance of general plant	932	372	245	15	22	43	1	1	20	11	15
233	Subtotal - Administrative and General Expenses		33,831	23,089	1,563	2,139	3,467	61	96	1,547	775	1,094
234	**TOTAL OPERATION AND MAINTENANCE EXPENSE**		204,276	159,720	9,625	11,971	13,020	511	564	5,035	1,640	2,190

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Line No.	Account Description	FERC Account	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
235	**Adjustments, Depreciation and Amortization Expense**											
236	**Depreciation Expense**											
237	Depreciation expense production	403	146	122	7	9	5	0	0	1	-	-
238	Depreciation expense storage and terminaling	403.1	-	-	-	-	-	-	-	-	-	-
239	Depreciation expense transmission	403.2	1,904	1,119	71	130	341	8	5	127	43	61
240	Depreciation expense distribution	403.3	14,872	9,784	590	893	1,706	32	36	796	424	611
241	Depreciation expense general plant	403.4	6,134	4,178	283	394	626	11	17	280	141	203
242	Depreciation expense common	403.5	350	229	14	21	42	1	1	19	10	14
243	Subtotal - Depreciation Expense		23,406	15,433	965	1,448	2,720	52	59	1,224	617	888
244	**Amortization Expense**											
245	Amortization and depletion of producing natural gas land and lanc	404.1	1,896	1,584	95	119	71	6	6	15	-	-
246	Amortization of underground storage land and land rights	404.2	-	-	-	-	-	-	-	-	-	-
247	Amortization of other limited-term gas plant	404.3	-	-	-	-	-	-	-	-	-	-
248	Amortization of other gas plant	405	-	-	-	-	-	-	-	-	-	-
249	Amortization of gas plant acquisition adjustments	406	-	-	-	-	-	-	-	-	-	-
250	Amortization of property losses, unrecovered plant and regulaton	407.1	-	-	-	-	-	-	-	-	-	-
251	Amortization of conversion expense	407.2	-	-	-	-	-	-	-	-	-	-
252	Subtotal - Amortization Expense		1,896	1,584	95	119	71	6	6	15	-	-
				-	-	-	-	-	-	-	-	-
253	Adjustments			-	-	-	-	-	-	-	-	-
254	Regulatory Debits	407.3	-	-	-	-	-	-	-	-	-	-
255	Regulatory Credits	407.4	(228)	(162)	(11)	(12)	(23)	(0)	(1)	(10)	(5)	(4)
256	Gains from disposition of utility plant	411.6	-	-	-	-	-	-	-	-	-	-
257	Losses from disposition of utility plant	411.7	-	-	-	-	-	-	-	-	-	-
258	Revenues from natural gas plant leased to others	412	-	-	-	-	-	-	-	-	-	-
259	Expenses of natural gas plant leased to others	413	-	-	-	-	-	-	-	-	-	-
260	Other utility operating income	414	-	-	-	-	-	-	-	-	-	-
261	Subtotal - Adjustments			(162)	(11)	(12)	(23)	(0)	(1)	(10)	(5)	(4)
				-	-	-	-	-	-	-	-	-
262	**Total Adjustments, Depreciation and Amortization Expense**		25,074	16,855	1,049	1,555	2,768	58	64	1,229	612	884
263	**Taxes**											
264	**Taxes Other Than Income Taxes**											
265	Taxes Other Than Income Taxes - Property	408.1	113	73	5	7	14	0	0	6	3	4
266	Taxes Other Than Income Taxes - Payroll	408.2	2,400	1,635	111	154	245	4	7	110	55	79
267	Taxes Other Than Income Taxes - Excise	408.3	(23)	(16)	(1)	(1)	(2)	(0)	(0)	(1)	(0)	(0)
268	Subtotal - Taxes Other Than Income Taxes		2,490	1,692	114	160	256	5	7	115	58	83
269	**Income Taxes**											
270	Income Taxes - federal taxes utility operating income	409.1	(1,653)	(1,064)	(65)	(102)	(207)	(4)	(4)	(93)	(46)	(68)
271	Income Taxes - state taxes utility operating income	409.2	-	-	-	-	-	-	-	-	-	-
272	Income Taxes - other taxes utility operating income	410.1	-	-	-	-	-	-	-	-	-	-
273	Provision for deferred income taxes—credit, utility operating inco	411.1	(687)	(449)	(27)	(42)	(83)	(2)	(2)	(37)	(19)	(27)
274	Investment Tax credit Adj.	411.4	-	-	-	-	-	-	-	-	-	-
275	Subtotal - Income Taxes		(2,340)	(1,513)	(93)	(144)	(290)	(6)	(6)	(130)	(65)	(94)
276	**Total Taxes**		150	179	21	16	(34)	(1)	1	(15)	(7)	(11)

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Line No.	Account Description	FERC Account	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
277	**REVENUE REQUIREMENT AT EQUAL RATES OF RETURN**											
278	**Test Year Expenses at Current Rates**		229,499	176,754	10,695	13,541	15,754	568	629	6,249	2,245	3,063
279	**Return on Rate Base**		50,185	32,308	1,981	3,090	6,290	123	123	2,813	1,407	2,050
280	**Gross Up Items**			-	-	-	-	-	-	-	-	-
281	Federal Income Tax		3,764	2,423	149	232	472	9	9	211	106	154
282	State Utility Tax		1,451	934	57	89	182	4	4	81	41	59
283	Bad Debts		305	289	7	3	1	0	1	2	0	0
284	Annual Filing Fee		-	-	-	-	-	-	-	-	-	-
285	**TOTAL REVENUE REQUIREMENT AT EQUAL RATES OF RETURN**		**285,204**	**212,708**	**12,890**	**16,956**	**22,699**	**704**	**767**	**9,357**	**3,798**	**5,326**

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SCHEDULE 7 - FUNCTIONALIZED AND CLASSIFIED RATE BASE AND REVENUE REQUIREMENT, AND UNIT COSTS BY CUSTOMER CLASS
($ in thousands)

Line	Description		TOTAL	Total Check	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
1	**Functional Rate Base**												
2	**Production**												
3	Demand	Product_Dem	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
4	Commodity	Product_Comm	$ 7,865	-	$ 6,586	$ 397	$ 493	$ 277	$ 28	$ 26	$ 57	$ -	$ -
5	Customer	Product_Cust	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
6	Subtotal		$ 7,865	-	$ 6,586	$ 397	$ 493	$ 277	$ 28	$ 26	$ 57	$ -	$ -
			$ -	-									
7	**Transmission**		0	-									
8	Demand	Transm_Dem	$ 70,794	-	$ 41,607	$ 2,628	$ 4,847	$ 12,666	$ 291	$ 171	$ 4,727	$ 1,596	$ 2,264
9	Commodity	Transm_Comm	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
10	Customer	Transm_Cust	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
11	Subtotal		$ 70,794	-	$ 41,607	$ 2,628	$ 4,847	$ 12,666	$ 291	$ 171	$ 4,727	$ 1,596	$ 2,264
			0	-									
12	**Distribution**		0	-									
13	Demand	Distrib_Dem	$ 316,299	-	$ 171,411	$ 11,227	$ 19,940	$ 54,184	$ 939	$ 814	$ 24,590	$ 12,810	$ 20,385
14	Commodity	Distrib_Comm	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
15	Customer	Distrib_Cust	$ (2,541)	-	$ (2,622)	$ (85)	$ 78	$ 61	$ 1	$ 6	$ 18	$ 2	$ 2
16	Subtotal		$ 313,758	-	$ 168,788	$ 11,142	$ 20,017	$ 54,245	$ 940	$ 820	$ 24,607	$ 12,812	$ 20,387
			0	-									
17	**Customer**		0	-									
18	Demand	Cust_Dem	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
19	Commodity	Cust_Comm	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
20	Customer	Cust_Cust	$ 179,164	-	$ 150,986	$ 8,397	$ 9,838	$ 4,450	$ 140	$ 389	$ 2,649	$ 1,618	$ 696
21	Subtotal		$ 179,164	-	$ 150,986	$ 8,397	$ 9,838	$ 4,450	$ 140	$ 389	$ 2,649	$ 1,618	$ 696
			0	-									
22	**Gas Supply**		0	-									
23	Demand	Gas Supply_Dem	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
24	Commodity	Gas Supply_Comm	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
25	Customer	Gas Supply_Cust	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
26	Subtotal		$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
			0	-									
27	**Total**		0	-									
28	Demand		$ 387,093	-	$ 213,017	$ 13,854	$ 24,787	$ 66,850	$ 1,230	$ 985	$ 29,316	$ 14,406	$ 22,649
29	Commodity		$ 7,865	-	$ 6,586	$ 397	$ 493	$ 277	$ 28	$ 26	$ 57	$ -	$ -
30	Customer		$ 176,623	-	$ 148,364	$ 8,313	$ 9,916	$ 4,510	$ 140	$ 395	$ 2,667	$ 1,620	$ 698
31	**TOTAL RATE BASE**		$ 571,582	-	$ 367,968	$ 22,564	$ 35,196	$ 71,637	$ 1,398	$ 1,406	$ 32,040	$ 16,026	$ 23,347

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study under Peak & Average
Test Year Ending October 31, 2027
SCHEDULE 7 - FUNCTIONALIZED AND CLASSIFIED RATE BASE AND REVENUE REQUIREMENT, AND UNIT COSTS BY CUSTOMER CLASS
($ in thousands)

Line	Description		TOTAL	Total Check	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
			0	-									
32	**Functional Revenue Requirement**		0	-									
			0	-									
33	**Production**		0	-									
34	Demand	Product_Dem	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
35	Commodity	Product_Comm	$ 2,974	-	$ 2,486	$ 149	$ 186	$ 109	$ 10	$ 9	$ 23	$ -	$ -
36	Customer	Product_Cust	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
37	Subtotal		$ 2,974	-	$ 2,486	$ 149	$ 186	$ 109	$ 10	$ 9	$ 23	$ -	$ -
			0	-									
38	**Transmission**		0	-									
39	Demand	Transm_Dem	$ 10,587	-	$ 6,222	$ 393	$ 725	$ 1,894	$ 43	$ 26	$ 707	$ 239	$ 339
40	Commodity	Transm_Comm	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
41	Customer	Transm_Cust	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
42	Subtotal		$ 10,587	-	$ 6,222	$ 393	$ 725	$ 1,894	$ 43	$ 26	$ 707	$ 239	$ 339
			0	-									
43	**Distribution**		0	-									
44	Demand	Distrib_Dem	$ 71,390	-	$ 38,688	$ 2,534	$ 4,500	$ 12,230	$ 212	$ 184	$ 5,550	$ 2,891	$ 4,601
45	Commodity	Distrib_Comm	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
46	Customer	Distrib_Cust	$ 4,320	-	$ 3,435	$ 287	$ 338	$ 181	$ 2	$ 19	$ 49	$ 5	$ 4
47	Subtotal		$ 75,710	-	$ 42,123	$ 2,821	$ 4,839	$ 12,410	$ 214	$ 203	$ 5,599	$ 2,896	$ 4,605
			0	-									
48	**Customer**		0	-									
49	Demand	Cust_Dem	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
50	Commodity	Cust_Comm	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
51	Customer	Cust_Cust	$ 71,363	-	$ 61,057	$ 3,516	$ 3,416	$ 1,676	$ 39	$ 166	$ 852	$ 434	$ 207
52	Subtotal		$ 71,363	-	$ 61,057	$ 3,516	$ 3,416	$ 1,676	$ 39	$ 166	$ 852	$ 434	$ 207
			0	-									
53	**Gas Supply**		0	-									
54	Demand	Gas Supply_Dem	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
55	Commodity	Gas Supply_Comn	$ 124,571	-	$ 100,820	$ 6,010	$ 7,790	$ 6,609	$ 398	$ 364	$ 2,175	$ 229	$ 176
56	Customer	Gas Supply_Cust	$ -	-	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
57	Subtotal		$ 124,571	-	$ 100,820	$ 6,010	$ 7,790	$ 6,609	$ 398	$ 364	$ 2,175	$ 229	$ 176
			0	-									
58	**Total**		0	-									
59	Demand		$ 81,977	-	$ 44,910	$ 2,927	$ 5,225	$ 14,124	$ 255	$ 209	$ 6,257	$ 3,130	$ 4,939
60	Commodity		$ 127,544	-	$ 103,306	$ 6,159	$ 7,976	$ 6,719	$ 408	$ 373	$ 2,198	$ 229	$ 176
61	Customer		$ 75,683	-	$ 64,492	$ 3,803	$ 3,754	$ 1,856	$ 40	$ 185	$ 902	$ 439	$ 211
	TOTAL REVENUE REQUIREMENT AT EQUAL		$ 285,204		$ 212,708	$ 12,890	$ 16,956	$ 22,699	$ 704	$ 767	$ 9,357	$ 3,798	$ 5,326
62	**RATES OF RETURN**			-									
63	Demand		28.74%		21.11%	22.71%	30.82%	62.22%	36.29%	27.29%	66.87%	82.41%	92.74%
64	Energy		44.72%		48.57%	47.78%	47.04%	29.60%	57.98%	48.58%	23.49%	6.04%	3.30%
65	Customer		26.54%		30.32%	29.51%	22.14%	8.18%	5.72%	24.13%	9.64%	11.55%	3.97%

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study under Peak & Average
Test Year Ending October 31, 2027
SCHEDULE 7 - FUNCTIONALIZED AND CLASSIFIED RATE BASE AND REVENUE REQUIREMENT, AND UNIT COSTS BY CUSTOMER CLASS
($ in thousands)

Line	Description		TOTAL	Total Check	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
66	**Unit Costs (in $)**												
67	**Production**												
68	Demand	Product_Dem	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
69	Commodity	Product_Comm	$ 0.08		$ 0.13	$ 0.12	$ 0.08	$ 0.02	$ 0.15	$ 0.09	$ 0.01	$ -	$ -
70	Customer	Product_Cust	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
71	**Transmission**												
72	Demand	Transm_Dem	$ 2.20		$ 2.20	$ 2.20	$ 2.20	$ 2.20	$ 2.20	$ 2.20	$ 2.20	$ 2.20	$ 2.20
73	Commodity	Transm_Comm	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
74	Customer	Transm_Cust	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
75	**Distribution**												
76	Demand	Distrib_Dem	$ 14.85		$ 13.69	$ 14.20	$ 13.68	$ 14.22	$ 10.74	$ 15.85	$ 17.29	$ 26.69	$ 29.93
77	Commodity	Distrib_Comm	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
78	Customer	Distrib_Cust	$ 1.68		$ 1.45	$ 2.28	$ 6.33	$ 9.81	$ 18.46	$ 7.98	$ 11.63	$ 14.72	$ 36.60
79	**Customer**												
80	Demand	Cust_Dem	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
81	Commodity	Cust_Comm	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
82	Customer	Cust_Cust	$ 27.67		$ 25.72	$ 27.93	$ 63.93	$ 90.97	$ 460.99	$ 68.27	$ 201.72	$ 1,391.82	$ 1,724.79
83	**Gas Supply**												
84	Demand	Gas Supply_Dem	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
85	Commodity	Gas Supply_Comn	$ 3.26		$ 5.32	$ 4.64	$ 3.54	$ 1.06	$ 5.68	$ 3.48	$ 0.64	$ 0.10	$ 0.05
86	Customer	Gas Supply_Cust	$ -		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
87	**Total**												
88	Commodity		$ 3.34		$ 5.45	$ 4.76	$ 3.62	$ 1.07	$ 5.83	$ 3.56	$ 0.65	$ 0.10	$ 0.05
89	Customer (per cust month)		$ 29.35		$ 27.17	$ 30.21	$ 70.26	$ 100.78	$ 479.45	$ 76.25	$ 213.35	$ 1,406.54	$ 1,761.39
90	Demand & Customer (per cust month)		$ 61.14		$ 46.09	$ 53.46	$ 168.04	$ 867.58	$ 3,520.92	$ 162.50	$ 1,693.89	$ 11,438.24	$ 42,923.65
91	**BILLING DETERMINANTS**												
92	Demand (Peak Day Demand * 12)	PDAY	4,806,857	-	2,825,040	178,416	329,100	859,980	19,740	11,592	320,926	108,337	153,726
93	Commodity	COM	38,211,546	-	18,958,326	1,294,228	2,201,607	6,255,510	70,034	104,599	3,390,078	2,233,913	3,703,251
94	Customers (Number of Bills)	CUST	2,578,816	-	2,373,901	125,892	53,435	18,419	84	2,427	4,226	312	120

NATIONAL FUEL EXHIBIT JDT-19-R-B

Survey of Cost Classification of Gas Distribution Mains

State	Gas Utility	Recognition of a Customer Component of Distribution Mains?	Method Used to Derive Customer Component	Docket/ Case Number	Year
AL	Alabama Gas Corporation	Revenue Stabilization and Equalization (RSE) Plan was approved in early 1980s.			
AK	Enstar Natural Gas Company	No		U-16-066	2017
AZ	Southwest Gas	Yes	Minimum system	D-G-01551A-23-0341	2025
AR	Black Hills Energy Arkansas	Yes	Minimum system (2" main)	21-097-U	2022
CA	SDG&E	Long-Run Marginal Cost (LRMC) studies are a regulatory requirement		A11-10-002, D14-01-002	2014
CO	Public Service Company of CO	No		08S-146G / C08 - 1311	2008
CT	United Illuminating (Connecticut Natural Gas)	Yes	Zero-intercept method	D-23-11-02	2024
DE	Chesapeake Utilities	No		05-304	2006
DC	Washington Gas Light Company	No	Minimum system	FC-1169	2023
FL	Florida Public Utilities	No		030569-GU / 04-0128-PAA-GU	2004
GA	Atlanta Gas Light Company	Yes	Minimum system	31647	2010
HI	The Gas Company	Yes	Minimum system (1" main)	Docket No. 00-0309	2002
ID	Intermountain Gas Co.	Yes	Zero-intercept method	INT-G-22-07	2024
IL	Northern Illinois Gas Co.	Yes	Minimum system	D-23-0066	2023
IN	NIPSCO and Indiana Gas Company	Yes	50/50 weighting to customer and demand	38380	1987
IA	Interstate Power & Light Company	No		RPU-2002-0007	2003
KS	Atmos Energy	No		14-ATMG-320-RTS	2014
KY	Atmos Energy	Yes	Minimum system	D-22AL-0348G	2023
LA	CenterPoint Energy	Yes	Minimum system (2” main)	U-27676	2004
ME	Northern Utilities Inc.	Cost of service study not relied upon		D-2019-00092	2020
MD	Columbia Gas of Maryland Inc.	No		C-9609	2020
MA	NSTAR Gas Co.	No		DPU 19-120	2020
MI	Consumers Energy Co.	No		U-20322	2019
MN	Minnesota Energy Resources	Yes, multiple cost studies considered	Zero-intercept method (with Min Size comparison required)	D-G-011/GR-22-504	2023
MS	CenterPoint Energy	Yes	Minimum system (2” main)	96-UN-0202	1996
MO	Missouri Gas Energy	Yes	Minimum system	GR-2017-0216	2018
MT	NorthWestern Energy	Multiple cost study basis		D2012.9.94	2013
NE	SourceGas	Yes	Minimum system and customer weighting factors	NG-0067	2012
NV	Southwest Gas	Yes	50/50 weighting to customer and demand	D-20-02023	2020
NH	Liberty Utilities (EnergyNorth)	Marginal cost study		DG-17-048	2018

Survey of Cost Classification of Gas Distribution Mains

State	Gas Utility	Recognition of a Customer Component of Distribution Mains?	Method Used to Derive Customer Component	Docket/ Case Number	Year
NJ	South Jersey Gas Company	No		GR22040253	2023
NM	Gas Company of New Mexico	Yes	Minimum system (2" main)	23-00255-UT	2024
NY	National Fuel Gas	Yes	Zero-intercept method	C-23-G-0627	2024
NC	North Carolina Power & Light	Yes	Minimum system	Docket No. E-2, SUB 537	1988
ND	Xcel Energy (Northern States Power Company)	Yes	Zero-intercept method	C-PU-23-367	2024
OH	Columbia Gas of Ohio	Yes	Zero-intercept method	08-72-GA-AIR	2008
OK	CenterPoint Energy	Yes	Minimum system (2” main)	PUD201500118	2015
OR	Cascade Natural Gas	Long Run Incremental Cost studies (LRIC) are a regulatory requirement.			
PA	PPL Gas Utilities Corporation	No		R-00061398	2007
RI	National Grid	No		3943	2009
SC	Piedmont Natural Gas	Cost of service studies are not a regulatory requirement			
SD	NorthWestern Energy	No		NG07-13	2007
TN	Chattanooga Gas Co.	Cost of service studies are not a regulatory requirement		D-18-00017	2018
TX	Texas Gas Service Co.	Yes	Zero-intercept method	D-OS-24-00017471	2024
UT	Dominion Energy Utah	No		D-19-057-02	2020
VT	Vermont Gas Systems	No		6016	1998
VA	Roanoke Gas Co.	No		PUR-2018-00013	2020
WA	Generic Rulemaking on Cost of Service Methods	No		UG-170003	2020
WV	Hope Gas Inc.	Yes	Zero-intercept method	20-0746-G-42T	2021
WI	Northern States Power Co - WI	Multiple cost study basis		4220-UR-123	2017
WY	Questar Gas	Yes	Special Study	30010-187-GR-19	2012

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 19-RJ

Rejoinder Testimony of John D. Taylor

Topics Addressed:
- **Cost of Service Study**
- **Rate Design – Customer Charge**
- **Weather Normalization Adjustment**

Dated: June 1, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is John D. Taylor and my business address is 10 Hospital Center Commons, Suite 400, Hilton Head Island, South Carolina 29926.

Q. On whose behalf are you appearing in this proceeding?

A. I am appearing on behalf of National Fuel Gas Distribution Corporation's ("NFGDC") Pennsylvania Division ("National Fuel" or the "Company")[1].

Q. By whom are you employed and in what capacity?

A. I am employed by Atrium Economics, LLC ("Atrium") as a Chief Executive Officer ("CEO").

Q. Did you previously submit testimony in this proceeding on behalf of National Fuel Gas Distribution Corporation ("National Fuel" or the "Company")[2]?

A. Yes. I submitted my direct testimony, National Fuel Statement No. 19, on January 28, 2026, and surrebuttal testimony, National Fuel Gas Statement No. 19-R, on May 12, 2026

[1] Other parties use the term NFGDC to refer to National Fuel Gas Distribution Corporation's Pennsylvania Division. I have not altered instances when other parties' testimonies use this term but have relied on the term 'National Fuel' to reflect National Fuel Gas Distribution Corporation's Pennsylvania Division.

[2] Other parties use the term NFGDC to refer to National Fuel Gas Distribution Corporation's Pennsylvania Division. I have not altered instances when other parties' testimonies use this term but have relied on the term 'National Fuel' to reflect National Fuel Gas Distribution Corporation's Pennsylvania Division.

Q. Please describe the purpose of your rejoinder testimony.

A. My rejoinder testimony responds to certain portions of the following direct testimony submitted by other parties. The areas addressed include the following – with reference to the surrebuttal testimony of the other parties addressed:

II. Allocated Cost of Service Study Methodology

- Office of Consumer Advocate ("OCA") Statement No. 1SR - surrebuttal testimony of Michael Deupree ("OCA witness Deupree" or "Mr. Deupree"); and
- Bureau of Investigation and Enforcement ("I&E") Statement No. 3-SR - surrebuttal testimony of Ethan H. Cline ("I&E witness Cline" or "Mr. Cline").

III. Rate Design – Customer Charge

- OCA witness Deupree;
- I&E witness Cline; and
- The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA") Statement No. 1-SR – surrebuttal testimony of Harry S. Geller ("CAUSE-PA witness Geller").

IV. Weather Normalization Adjustment

- OCA witness Deupree;
- I&E witness Cline; and
- CAUSE-PA witness Geller.

Q. Are you sponsoring any exhibits with your rejoinder testimony?

A. No.

II. ALLOCATED COST OF SERVICE STUDY METHODOLOGY

Q. Have OCA witness Deupree and I&E witness Cline presented any new analysis that undermines the Company's allocation of distribution mains using a customer-demand methodology?

A. No. Their surrebuttal testimony does not provide new engineering or empirical evidence showing that annual throughput drives the design, sizing, or installation of distribution mains[3]. At this point, the dispute is not about whether mains must be sized to meet peak-day requirements; it is whether the record supports recognizing that mains investment also reflects the need to extend and maintain an integrated system to connect customers. Nothing in surrebuttal disproves that customer-related aspect of mains investment. Mr. Deupree continues to rely on a 1952 order from the Federal Power Commission[4], which is no longer relevant, since in 1973 the Federal Energy Regulatory Commission ("FERC") departed from this Seaboard method to the United method and then subsequently moved to a Modified Fixed variable approach in 1983, which allocated all fixed costs based on demand and all variable costs based on commodity.[5] This Commission should not rely on precedents from 1952 that have since been replaced.

[3] OCA Statement No. 1SR at 12-17 and I&E Statement No. 3-SR at 6-9.
[4] OCA St. 1SR, p. 12.
[5] National Fuel St. No 19 at 16 and National Fuel St. No 19-R at 15-16

Q. Does Mr. Deupree's continued criticism of the zero-intercept study[6] provide a better basis for classifying distribution mains costs?

A. No. Even if one sets aside his criticisms of the zero-intercept study, Mr. Deupree still does not offer a methodology that better distinguishes the portion of mains investment associated with connecting customers to the system from the portion associated with meeting peak-day capacity requirements. His proposed Peak and Average ("P&A") treatment instead assigns mains costs in part on annual throughput, which is a usage measure, not a direct measure of what causes the Company to extend or size distribution mains. For that reason, his surrebuttal does not rebut the Company's conclusion that a customer-demand classification better aligns mains costs with how they are incurred.

Q. Does Mr. Deupree's discussion of historical customer growth and annual mains investment[7] invalidate the recognition of a customer-related component of distribution mains?

A. No. Mr. Deupree's analysis examines whether changes in customer counts are correlated with changes in annual mains investment. However, the Company's customer-demand methodology does not assume that annual investment should move in lockstep with annual customer growth. Rather, it recognizes that the overall extent of the distribution network is fundamentally driven by the need to connect and serve customers. The relevant question is not whether year-to-year changes in customers explain year-to-year changes in investment, but whether a portion of the embedded distribution system exists

[6] OCA Statement No. 1SR at 12-13.
[7] OCA Statement No. 1SR at 14.

because customers must be connected to the network regardless of their usage. Deupree is effectively testing a marginal relationship (incremental customers versus incremental plant), while the zero-intercept/customer-demand approach is attempting to identify the embedded customer-related portion of the existing plant. The absence of a strong correlation between annual customer growth and annual distribution mains investment does not demonstrate that distribution mains lack a customer-related component. Rather, it reflects the fact that the existing distribution system was developed over time to connect and serve customers, while annual investment levels are influenced by a variety of additional factors.

Q. How do you respond to Mr. Cline's continued reliance on Commission precedent supporting the P&A methodology?

A. Mr. Cline primarily reiterates prior Commission decisions adopting the P&A methodology[8]. While precedent is an important consideration, the issue in this proceeding is whether the Company's proposed methodology reasonably reflects cost causation based on the facts and record before the Commission. His surrebuttal does not address that issue. Nor does he identify new evidence showing that annual throughput causes distribution mains investment. Accordingly, his reliance on prior Commission outcomes does not undermine the Company's record-based support for recognizing both customer-related and demand-related drivers of mains investment.

[8] I&E Statement No. 3-SR at 7.

III. RATE DESIGN – CUSTOMER CHARGE

Q. Please respond to OCA witness Deupree's testimony regarding the appropriate level of recovery of customer-related costs through the residential customer charge.

A. Mr. Deupree's analysis understates the appropriate level of customer-related cost recovery through the residential customer charge because it excludes legitimate customer-related overhead and administrative costs necessary to provide service.[9] Those are real, ongoing costs the Company incurs to connect, bill, serve, and support customers, and they are properly included in the Company's cost of service study under standard ratemaking principles. Although Mr. Deupree contends that the Company's proposal is internally inconsistent because it classifies a portion of main costs as customer-related while not proposing to recover those costs through the residential customer charge[10], that is not a contradiction. Instead, it reflects a conservative concession in the design of the proposed charge.

The Company is already foregoing recovery in the residential customer charge of costs that it identifies as customer-related, specifically the customer-related portion of mains. That treatment narrows, rather than expands, the level of customer-related cost recovery reflected in the proposed charge. If the Company had instead sought to include those costs in the proposed residential customer charge, intervenors presumably would object that the charge was set even higher. Mr. Deupree acknowledges that the current residential customer charge recovers only about 62 percent of the customer-related costs identified in his own analysis, which he calculates at $22.70 per customer per month[11].

[9] OCA Statement No. 1SR at 18.
[10] *Id.*
[11] *Id.* at 18-19.

That amount is materially higher than the current customer charge of $14.00, which he proposes to maintain. In my view, recovery at only 62 percent of customer-related costs does not reasonably reflect cost-causation principles, and Mr. Deupree's proposal is not supported by the *Lloyd* decision[12] because it would continue to recover customer-related costs well below the cost to serve without justification. Accordingly, I continue to support the Company's proposed $27.00 monthly residential customer charge as a more appropriate reflection of customer-related costs, regardless of any scale-back or the ultimate revenue requirement.

Q. Please respond to I&E witness Cline's assertion that the Company failed to provide a customer cost analysis based on the P&A Allocated Cost of Service ("ACOSS") and that the Company's proposed customer costs therefore are unsupported and should be limited to approximately their respective class increases.[13]

A. Mr. Cline's assertion is incorrect. The Company submitted the P&A ACOSS, including the customer cost analysis, as Exhibit JDT-19-R-A. Accordingly, Mr. Cline's claim that the Company's proposed customer costs are unsupported, and his recommendation to limit customer charges to approximately the respective class increases overlooks evidence already in the record.

[12] *Lloyd v. Pa. P.U.C.*, 904 A.2d 1010 (Pa. Cmwlth. 2006), *appeal denied*, 591 Pa. 676, 916 A.2d 1104 (2007).
[13] I&E Statement No. 3-SR at 14.

Q. How do you respond to CAUSE-PA witness Geller's continued opposition to the Company's proposed residential customer charge increase[14]?

A. Mr. Geller's surrebuttal continues to reflect a policy preference for recovering a larger portion of fixed distribution costs through volumetric rates[15]. As discussed in my rebuttal testimony, the Company's proposed customer charge is supported by cost causation principles and the Company's ACOSS[16]. Mr. Geller does not present new evidence undermining that analysis.

IV. WEATHER NORMALIZATION ADJUSTMENT

Q. Did you review the 2009 report cited by OCA witness Deupree[17], and does it support his characterization of the Company's proposed WNA?

A. Yes. I reviewed the report titled *Rate Impacts and Key Design Elements of Gas and Electric Utility Decoupling: A Comprehensive Review* by Pamela G. Lesh, which OCA witness Deupree cites. The report does not support witness Deupree's conclusion that the Company's proposed WNA is one-sided or operates primarily in the utility's benefit. To the contrary, the report states that decoupling adjustments "are both refunds to customers as well as charges and tend to be small."[18] This is clearly stated in the report's abstract – right up top in italicized letters. It further states that no consistent pattern of either rate increases or decreases emerges, and that the adjustments were "most often under 2

[14] CAUSE-PA St. 1-SR at 18-20.
[15] CAUSE-PA St. 1-SR at 19.
[16] NFGDC Statement No. 19-R at 21-22.
[17] OCA Statement No. 1SR at 5-6.
[18] Pamela G. Lesh, "Rate Impacts and Key Design Elements of Gas and Electric Utility Decoupling: A Comprehensive Review," The Electricity Journal, Vol. 22, Issue 8 (Oct. 2009), at 66.

percent," with "the majority under 1 percent."[19] Those conclusions are inconsistent with OCA's suggestion that such mechanisms operate asymmetrically or primarily to customers' detriment.

Q. Why is that report of limited applicability to the Company's proposed WNA?

A. The report has limited applicability for at least two reasons. First, it was published approximately 17 years ago and evaluated mechanisms that differ materially from the WNA structures currently used in Pennsylvania. Second, the report expressly notes that most of the mechanisms it reviewed did not adjust revenues for the effects of weather.[20] That limitation is significant because the Company's proposed WNA is specifically designed to normalize only for weather-related variation around the same weather assumptions used to establish base rates. Accordingly, the study does not provide a meaningful basis to assess the operation of a modern Pennsylvania WNA.

Q. How does the Company's proposed WNA differ from the broader decoupling mechanisms evaluated in the report?

A. The distinction is important. Many of the revenue decoupling mechanisms discussed in the report were designed to address broader revenue variation associated with changes in customer usage, including conservation, energy efficiency, economic conditions, and other non-weather factors.[21] The Company's proposed WNA does not do that. It is not a general revenue decoupling mechanism. Rather, it is narrowly designed to normalize only for

[19] *Id.*
[20] *Id.* at 67.
[21] *Id.*

weather-related deviations from the weather assumptions embedded in rates. For that reason, the historical operation of broader decoupling mechanisms does not establish that the Company's proposed WNA is one-sided or primarily beneficial to the utility. Like the mechanisms described in the report, the proposed WNA operates symmetrically and can produce either customer credits or surcharges depending on actual weather conditions.

Q. Please respond to OCA witness Deupree's continued claim that the WNA has functioned as an "asymmetric" mechanism because it has produced more surcharges than credits.[22]

A. Mr. Deupree's claim continues to confuse the design of the WNA with the weather outcomes observed during the review period. The WNA is symmetrical by design because it can produce either surcharges or credits depending on whether the actual weather is warmer or colder than the normal weather embedded in rates. The fact that the historical period experienced more warmer-than-normal conditions than colder-than-normal conditions does not make the mechanism asymmetric; it reflects the weather that occurred, not a one-sided feature of the mechanism. The Company does not control those weather outcomes.

What the Company can do, and has done, is improve the assumptions used in the mechanism so that the normal weather benchmark better reflects recent conditions. Specifically, the Company updated the weather normalization from a 15-year average to a more current 10-year average.[23] The expected result of using a more current normalization

[22] OCA Statement No. 1SR at 4-5.
[23] NFGDC Statement No. 19 at 25.

period is that the benchmark should better reflect recent weather conditions and, over time, support a more balanced pattern of customer surcharges and credits, depending on actual weather outcomes.

Q. OCA witness Deupree states that the Company's proposed WNA allows the Company to recover revenue declines from reduced use per customer between rate cases.[24] Do you agree?

A. No. That statement incorrectly characterizes the operation of the Company's proposed WNA. Mr. Deupree cites testimony regarding the selection of a 10-year weather normalization period, but that testimony does not support his claim that the WNA addresses regulatory lag. The cited testimony simply explains how normal weather is established for ratemaking purposes. The WNA does not allow the Company to recover declines in use per customer between rate cases. It adjusts only for deviations between actual weather and the normal weather assumptions used to establish base rates. If customer usage declines due to conservation, energy efficiency, fuel switching, appliance efficiency improvements, economic conditions, changes in occupancy, or other non-weather factors, the WNA provides no recovery mechanism for those lost revenues. Those impacts remain entirely outside the scope of the WNA. Accordingly, the proposed WNA does not insulate the Company from declining use per customer trends or changing customer usage patterns between rate cases.

[24] OCA Statement No. 1SR at 6.

Q. How would a utility recover declines in use per customer between rate cases, and how does that differ from the Company's proposed WNA?

A. Recovery of declining use per customer between rate cases would generally require either new base rates that reflect updated billing determinants or a revenue decoupling mechanism that adjusts revenues based on actual usage levels relative to authorized levels. The Company's proposed WNA does neither. It is a weather normalization mechanism, not a revenue decoupling mechanism. OCA witness Deupree therefore incorrectly equates weather normalization with revenue decoupling.

Q. Please respond to OCA witness Deupree's recommendation to increase the WNA deadband from 3% to 5% and to exclude May and October from the WNA period.[25]

A. I continue to disagree with these proposals. They rely heavily on the Commission's decision in the Columbia Gas proceeding[26] and focus primarily on limiting potential customer surcharges, while not fully accounting for the corresponding effect on customer credits and the overall effectiveness of the WNA.

While I do not dispute that a 5% deadband may have been found reasonable for Columbia Gas based on the record and WNA design presented in that proceeding, that does not mean a 5% deadband is the most appropriate outcome for National Fuel in this case. The relevant question here is not whether 5% can be reasonable in some circumstances, but whether increasing National Fuel's deadband from 3% to 5% is appropriate when evaluated together with the Company's full WNA proposal and the

[25] OCA Statement No. 1SR at 6-8.
[26] OCA Statement No. 1SR at 11.

evidentiary record in this proceeding. In other words, the deadband should not be evaluated in isolation. In this case, the Company has already proposed to update the weather normalization from a 15-year normal to a more current 10-year normal[27], which better reflects recent weather conditions and is expected to reduce the likelihood and magnitude of WNA surcharges or credits over time. Stated differently, the Company's proposal already narrows the circumstances in which the WNA will produce adjustments by improving the definition of normal weather.

Moreover, adding a larger 5% deadband on top of that change would unnecessarily weaken the WNA, leaving a wider range of meaningful weather-related usage variation outside the mechanism. That would reduce both surcharges in warmer-than-normal periods and credits in colder-than-normal periods. The most recent example is the colder-than-normal 2025–2026 winter season, during which a 5% deadband would have reduced the credits customers actually received.

I also disagree with Mr. Deupree's proposal to exclude May and October from the WNA period. Although those months account for a smaller share of annual heating degree days than the core winter months, they still involve heating requirements and weather-sensitive usage. The relevant question is not whether May and October are among the coldest months of the year, but whether deviations from normal weather during those months can affect residential heating usage. They can and they do.

[27] NFGDC Statement No. 19 at 25.

Q. Does I&E witness Cline propose similar limitations to the WNA[28]?

A. Yes. Mr. Cline recommends that May be excluded from the calculation of the WNA and that the deadband be increased to 5%. In addition to the points I made in response to Mr. Deupree, a deadband is not simply a meteorological judgment about what range of weather may be considered normal. It is also a ratemaking design choice that determines how much weather-related revenue and bill volatility remains outside the mechanism and therefore continues to be borne by customers and the Company. As the most recent heating season demonstrates, a larger deadband does not necessarily benefit customers.

Q. How do you respond to CAUSE-PA witness Geller's continued request to end the WNA?[29]

A. Mr. Geller's principal basis for recommending that the WNA be ended is his continued claim that the mechanism operates asymmetrically.[30] I have already addressed that claim earlier in this rejoinder testimony in response to OCA witness Deupree and I&E witness Cline. For the reasons explained there, I do not agree that the operation of the WNA during the review period provides a basis to terminate the WNA.

[28] I&E Statement No. 3-SR at 3.
[29] CAUSE-PA St. 1-SR at 21.
[30] *Id.*

Q. How do you respond to CAUSE-PA witness Geller's continued request to modify the WNA mechanism deadband and months of application?[31]

A. I address those same arguments in my responses to OCA witness Deupree and I&E witness Cline above. As discussed there, those proposed changes are not informative and do not provide a persuasive basis to modify the WNA.

Q. Please respond to OCA witness Deupree's recommendation that, if the Commission continues the WNA, the Company should expand weather normalization to include additional weather stations in DuBois, Pittsburgh, and Bradford, Pennsylvania.[32]

A. That recommendation is addressed by Company witness Cathryn E. Hilliard. However, it is helpful to note that witness Deupree's own Figure 1, which provides the heating degree days for all four weather stations, indicates there are still meaningful HDDs in October and May, and that the lowest level of HDDs, across all months, including October and May, exists in Pittsburgh, which is not within the Company's service territory.

Q. Does this conclude your rejoinder testimony at this time?

A. Yes.

[31] CAUSE-PA St. 1-SR, pp. 41-42.
[32] OCA Statement No. 1SR at 11.

NATIONAL FUEL STATEMENT NO. 20

DANIEL J. CZECHOWICZ

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. R-2025-3059428

National Fuel Gas Distribution Corporation
Pennsylvania Division

Statement No. 20

Direct Testimony of
Daniel J. Czechowicz

Topics Addressed: Transportation Programs

Dated: January 28, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Daniel J. Czechowicz. My business address is 6363 Main Street, Williamsville, New York 14221.

Q. By whom and in what capacity are you employed?

A. I am employed by National Fuel Gas Distribution Corporation ("NFGDC") as a Director in the Gas Supply Administration ("GSA") department. My primary responsibilities include ensuring tariff compliance and managing all aspects of the NFGDC's transportation programs, for both the Pennsylvania Division ("National Fuel" or the "Company") and New York Division ("National Fuel – NY").

Q. Please provide your educational background.

A. I received an Associates of Science degree in Business Administration from Daemen College in 1997 and a Master of Business Administration degree from the University at Buffalo in 2013.

Q. Please provide your professional experience.

A. In 1998 I was hired by National Fuel Resources, Inc. (a former marketing subsidiary of National Fuel Gas Company), as a Transportation & Exchange Analyst. In 2005, I was promoted to Senior Energy Analyst, became an Assistant Manager of Energy Operations in 2008, and in 2016 I was promoted to Manager of Energy Operations. In 2018, I

transferred to NFGDC as a Manager in the GSA department. In 2022, I was promoted to Director in the GSA department.

Q. Have you previously testified in other proceedings before the Pennsylvania Public Utility Commission ("PAPUC" or the "Commission") or any other state or federal agency?

A. I testified before the New York Public Service Commission on behalf of National Fuel – NY in Case 23-G-0627.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your testimony?

A. My testimony will provide a description of three proposed changes to the Company's transportation programs. The first proposal is related to the Company's Daily Metered Transportation ("DMT") program. The Company proposes changing the DMT program from a stand-alone customer program to an aggregated program, which would eliminate the customer banking aspect of the current program. The second proposal is related to a telemetering program for customers in DMT service. The Company is proposing to convert existing customers using Plain Old Telephone Service ("POTS") to cellular service and assuming responsibility from its customers for providing meter related communication services. The final proposal is associated with changing the publication that is used for calculating the Monthly Market Index that is used in the transportation program for cashout pricing.

Q. Are you sponsoring any exhibits or filing requirements in this proceeding?

A. Yes. I am sponsoring National Fuel Exhibit DJC-1, Pro-Forma Tariff pages of DMT proposal.

III. DMT PROPOSAL

Q. Please explain your first proposal including the services provided in the Company's current transportation program.

A. Customers that choose to purchase their gas from third-party suppliers must enroll in the Company's transportation program. Subject to program eligibility criteria, customers may apply for Monthly Metered Natural Gas Service ("MMNGS"), Small Aggregation Transportation Supplier Service ("SATS") or DMT service.

Q. How many customers are currently enrolled in DMT service?

A. The Company has approximately 78 accounts enrolled across 12 market pools in DMT service.

Q. How are customers currently enrolled in DMT Service?

A. Suppliers enroll DMT customers in DMT market pools through the Transportation Scheduling System ("TSS").

Q. Can multiple customers be enrolled in a DMT market pool?

A. Yes, the Company currently operates DMT market pools that contain more than one DMT customer, however, daily delivery volumes are scheduled to each individual

customer using a "Gas Out" nomination to transport gas from the central delivery point to the customer's burner tip. Customer usage volumes are not aggregated in the market pool.

Q. Explain the current customer eligibility requirements for DMT service.

A. DMT service is available to all customers that elect transportation service and meet the qualifications specified in the Rate Schedule for DMT Service in the Company's tariff. Among those qualifications, customers are required to sign a DMT service agreement and have telemetering equipment in place which allows the Company to remotely collect daily meter readings.

Q. Why is it important for the Company to collect daily meter readings from DMT customers?

A. Collecting daily meter readings allows the Company to determine any daily imbalances resulting from differences between a customer's allocated daily deliveries and their actual daily usage.

Q. Explain how allocated deliveries might differ from actual usage and result in imbalances.

A. DMT customers communicate their gas requirements with their suppliers so that daily delivery volumes match the customer's expected daily consumption. On a given day, if a DMT customer's gas delivery exceeds their usage, the difference results in an "overdelivery". The Company will store the customer's overdelivery volume as "banked

gas" for later use by the customer. A customer's banked gas volume may include an accumulation of numerous overdeliveries. The DMT customer may use such banked gas as the first gas through the meter on the following day(s). Any accumulated banked gas remaining at the end of a month will be delivered first through the meter on the first day of the subsequent month. The customer is subject to overdelivery charges as specified in the Company's tariff. A customer "underdelivery" occurs when a customer's daily usage exceeds their banked gas volume and their daily delivery volume for that given day.

Q. Expand on underdeliveries and the 2% tolerance established in the Company's tariff.

A. In certain instances, the Company may sell gas to the customer to resolve the customer's underdelivery for the given day. When the customer underdelivery exceeds the 2% tolerance (2% of the customer's usage), the Company sells a quantity of gas to the customer that equals the amount of gas used by the customer above the two percent tolerance volume. Daily underdelivery volumes greater than 2% will be a sale of gas by the Company for that day and may not be recharacterized as transportation service under any circumstances. For underdeliveries within the two percent tolerance, the Company deducts the underdelivery quantity from the customer's banked balance gas volume, which may be offset by additional deliveries on subsequent days within the same month.

Q. What happens to the overdelivery and underdelivery volumes after the month has ended?

A. Any cumulative underdelivery volume remaining on the last day of the month will be cashed out as a tariff sale and will not be carried into the next month. Customers that have overdelivery volumes at the end of the month can carry the volumes to the following month.

Q. How does the customer banking process impact daily deliveries to the Company's system?

A. The customer banking process allows DMT customers to store overdelivery volumes for future use. Customers with accumulated banked volumes can currently use their banked volumes to meet their daily usage quantity and not deliver gas to the system on that day. This causes reduced deliveries from suppliers to the Company's system for DMT customers. Since actual deliveries often differ from actual customer usage on any given day, the Company must actively manage these daily imbalances to maintain reliability of the entire system.

Q. How does the Company currently manage the challenge of its system balancing obligation?

A. Related to marketer deliveries, the Company may issue an Operational Flow Order ("OFO") that limits customer imbalances. For example, during a Cold Weather OFO period, DMT customers shall not be permitted to use banked gas to cover daily underdeliveries in excess of the 2% tolerance. By limiting the access to DMT customer banked volumes, suppliers are required to make daily deliveries that more closely match the DMT customer's actual usage. The customer's metered usage in excess of 102% of

confirmed deliveries during an OFO period are deemed a sale of gas by the Company to the customer.

Q. Who is responsible for overdelivery and underdelivery imbalances and associated charges?

A. The Natural Gas Supplier ("NGS") or the operator of the DMT market pool must ensure the daily amount of gas delivered to the Company's system ("Gas In") closely matches the volume used by the DMT customer ("Gas Out"). However, each DMT customer is responsible for their own overdelivery and underdelivery imbalances, including associated volumes and costs, which are invoiced by the Company.

Q. What change is the Company proposing to the DMT program?

A. The Company is proposing an aggregation program to replace the existing standalone customer program. These changes will eliminate the customer banking aspect of the program and transition customers to an aggregated program. Customers will be required to arrange deliveries of gas to the Company's system by selecting a DMT "aggregator" or the customer can act as their own aggregator on the system.

Q. Do existing DMT customers purchase gas from suppliers that are aggregators on the Company's system?

A. Yes, all current DMT customers purchase their gas from NGSs that are familiar with the Company's existing MMNGS and SATS aggregation programs.

Q. Why is the Company proposing a change to DMT Service?

A. The Company is looking to enhance operational integrity of the system by requiring customers to match daily deliveries to the system to actual daily usage. Under the existing program, each customer account stands alone and daily imbalances swing off the customers banked volumes, impacting daily deliveries to the system.

Q. How would DMT customer imbalances be managed under an aggregated program?

A. Customers would be aggregated into daily market pools maintained by an aggregator or NGS. The aggregator or NGS will benefit from an aggregated pool program where multiple customers are grouped within a market pool. This will allow the aggregator or NGS to manage individual customer imbalances by offsetting aggregated imbalances within each market pool on a daily basis. By aggregating customers into market pools, aggregators would make daily deliveries based on the expected daily usage for all the customers enrolled in the pool. Aggregators would not nominate to individual customers using a Gas Out nomination and customer bank volumes will no longer be available for customer imbalances.

Q. Explain how aggregating DMT customers in market pools helps to maintain the integrity of the system.

A. Eliminating the individual customer banks ensures daily deliveries are made to match the customers' expected daily usage. Implementing an aggregated service program would make daily deliveries to the system to match the aggregated customer daily usage

enrolled in a pool that may contain numerous customers. The aggregator would be cashed out each day for any daily surplus or deficiency imbalance volumes.

Q. What would be the requirements to become a DMT aggregator?

A. An aggregator would enter into a DMT imbalance netting agreement with the Company to establish a market pool. The aggregator would agree to act as the imbalance holder, taking on primary responsibility previously held by the customer for managing balancing activities and imbalance charges for customers enrolled in the market pool.

Q. How would customers be enrolled in a DMT market pool?

A. Customers will still require telemetering and the DMT contract. Under the current program, marketers enroll customers into a market pool using TSS. In the proposed program, DMT customers would be enrolled by their aggregator into a market pool via an Electronic Data Interchange ("EDI") transaction through an EDI provider.

Q. Will the Company provide DMT aggregators telemetered usage for the customers enrolled in the market pool?

A. Yes, the Company uses telemetering interface software to collect and store hourly meter readings to calculate hourly consumption volume for each meter assigned to the customer. Customer meter readings would be collected three times per day - at 10:00 am, 1:00 pm, and 4:00 pm. The hourly readings and calculated consumptions would be made available to aggregators promptly via TSS.

Q. What would be the daily delivery requirements for aggregated DMT customers?

A. Each day the Company will determine whether the total daily usage and delivery quantity variances of each aggregation pool are within the specified tolerance range, rather than evaluating individual DMT customer's variance. During normal operations the aggregation pool daily deliveries should match daily usages within a tolerance range of plus or minus 10%. During an OFO period, the tolerance range could be reduced to as little as plus or minus 2%.

Q. How will daily surplus and deficiency imbalances volumes be determined?

A. Each day, the Company will cash out pool imbalances by calculating the daily imbalance percentage of each aggregator's market pool. The market pool imbalance percentage will be computed by summing the volume of gas delivered for all customers in the pool, adjusted for line losses, divided by the sum of the burner tip usages for all customers in the pool. A systemwide imbalance percentage will be similarly calculated for all DMT customers in all aggregators' market pools. The Company compares the systemwide DMT imbalance to each market pool and evaluates the applicability of a "No-Harm, No-Foul" rule.

Q. Please explain the "No-Harm, No-Foul" rule.

A. Based on the market pool circumstances, the Company would apply a "No-Harm, No-Foul" rule to resolve DMT pool daily imbalance. For example, if the systemwide DMT imbalance percentage is less than or equal to the applicable daily tolerance percentage, then the individual market pools are not subject to daily cash out. If the system's DMT

imbalance percentage is greater than the applicable daily tolerance percentage, then individual market pools are subject to daily cash out at the daily cash out index rate if their imbalance percentage exceeds the applicable daily tolerance. Individual market pool imbalances in excess of the applicable daily tolerance percentage, except during an OFO, are only subject to cash out if the overall system is out of tolerance for that day in the same direction. DMT market pools are not subject to cash out if they are opposite to the direction of overall system imbalance. During an OFO, any pool out of tolerance in the direction of the OFO is cashed out even if the system is within tolerance.

Q. Define daily surplus and daily deficiency imbalances and what happens when they exceed the tolerance limits.

A. A daily surplus imbalance is created when the volume of gas delivered to the Company for the customer's account during the day is greater than the total amount of gas consumed by the customer each day. If the aggregator's daily surplus imbalance exceeds 10% and the aggregator pools as a whole are above the initial surplus tolerance band the surplus volume above the daily tolerance band would be cashed-out to return the aggregator's market pool to the daily tolerance level.

A daily deficiency imbalance is created when the volume of gas delivered to the Company for the customer's account during the day is less than the total amount of gas consumed by the customer each day. If the aggregator's daily deficiency imbalance exceeds 10% and the aggregator pools as a whole are below the initial deficiency tolerance band, the deficiency volume below the daily tolerance band would be cashed-out to return the aggregator's market pool to the daily tolerance level.

Q. Explain how a DMT aggregator's surplus imbalance volume would be cashed out.

A. All daily surplus imbalance volumes are purchased by the Company. The price paid by the Company to aggregator is based on the published daily index price and daily imbalance's tolerance level. Surplus volumes above 10% and less than or equal to 15% would be cashed out at 90% of the index price. Surplus volumes above 15% and less than or equal to 20% would be cashed out at 85% of the index price. Surplus volumes in excess of 20% would be cashed out at 60% of the index price.

Q. Explain how a DMT aggregator's deficiency imbalance volume would be cashed out.

A. To resolve daily deficiency volumes, the Company sells the equivalent deficiency volumes to DMT Aggregators. The price charged by the Company is based on the published daily index price and daily imbalance's tolerance level. Daily deficiency imbalance volumes above the 10% daily tolerance level would be cashed out using a tiered calculation and daily cash out index price. Deficiency volumes above 10% and less than or equal to 15% would be cashed out at 110% of the index price. Deficiency volumes above 15% and less than or equal to 20% would be cashed out at 115% of the index price. Deficiency volumes in excess of 20% would be cashed out at 140% of the index price.

Daily imbalance surplus and deficiency volumes that fall within the daily tolerance range are not subject to the daily cash out. Such de-minimis imbalance volumes are accumulated into a net monthly imbalance volume for the Aggregator. If the net imbalance volume results in a deficiency, a month end deficiency imbalance is

created. If the net imbalance volume results in a surplus, a month end surplus imbalance is created and added to the imbalance holder's total aggregated monthly imbalance quantity. Imbalance holders may exchange a month end imbalance during the imbalance trading period or the imbalance will be cashed out pursuant to Rule 30 in the Company's tariff.

Q. How will the daily and monthly cashout rates be calculated?

A. The daily and monthly cashout rates will be determined using the Market Price of Natural Gas referenced in the Company's tariff under Rules and Regulations, page 35E.

Q. As customers transition from the current DMT program to an aggregated program, what will happen to the customer's remaining bank volume?

A. Existing DMT customers and marketers would be notified in advance of the changes to an aggregated DMT service. The Company would recommend customers reduce their bank volumes during the last month of existing DMT service. After the monthly volumes have been finalized, the Company would purchase the remaining bank volumes from the customer as per the guidelines in the Company's tariff (Page No. 117).

Q. What are the anticipated customer benefits of transitioning to the proposed aggregated service?

A. The Company believes the proposed aggregation program model will ease the DMT customers' individual challenge of minimizing their delivery and usage imbalances. Also, the customers will no longer be directly charged by the Company for overdelivery

and underdelivery volumes. The aggregator will be responsible for balancing the daily delivery volumes and aggregated usage for the customers enrolled in their DMT market pool. The aggregator will be cashed out for any daily and monthly imbalance volumes.

Q. Will the Company need to make modifications to existing business applications to facilitate the changes to an aggregated DMT service?

A. Yes, in order to implement the proposed changes to the DMT service program, changes will need to be made to the Company's billing system (SAP) and TSS. The Company anticipates it will take approximately 12 months to make system modifications and implement the changes to the DMT program after the proposal is approved.

Q. Has the Company included this DMT proposal in its proposed tariff presented in National Fuel Exhibit F?

A. No. Due to the lead time required for implementation, this proposal is not being added to the proposed tariff as part of this filing. Instead, I am sponsoring pro-forma tariff pages in National Fuel Exhibit DJC-1. If the DMT program changes are approved, the Company proposes that these pro-forma tariff pages be submitted as a tariff compliance filing once the system modifications have been implemented.

Q. Are there any other issues related to the Company's DMT aggregation pool proposal?

A. No.

IV. TELEMETERING PROPOSAL

Q. Please explain the Company's second proposal related to the telemetering program.

A. The Company is proposing a change to the telemetering program for all telemetered customers under DMT service by converting existing plain old telephone service ("POTS") sites to cellular service and assuming from its customers the responsibility for providing meter-related communication services.

Q. Is telemetering at a customer's location critical to customer billing accuracy?

A. Yes. Reliable and accurate customer consumption data through daily and on-demand meter reading is important to customers, their NGSs, and the Company. Real-time access to meter reading allows parties to review and evaluate hourly and daily consumption, project anticipated consumption, and plan for gas supply deliveries. This is especially important to large industrial customers whose consumption is driven by their process instead of space heating demands. Large industrial customers' production processes are less predictable and tend to fluctuate based on numerous customer-specific factors.

Q. Are DMT customers required to have telemetering capability at their locations?

A. Yes, DMT customers must have telemetering equipment installed to allow the Company to monitor the customer's daily usage. DMT customers are responsible to pay for the installation of telemetering equipment and maintain continuous POTS or cellular telephone service communication access to the telemetering equipment to facilitate timely remote meter reads.

Q. How many such meters exist?

A. Currently, there are approximately 137 active telemetered sites located at 78 DMT customer locations of which only 22 sites utilize cellular telemetering. The remaining 115 sites utilize POTS lines.

Q. Do the customer and the Company reliably receive meter readings through the telemetering equipment?

A. Generally, when the telemetering and communication equipment is operating properly, the customer and Company are able to receive meter readings at their discretion. However, equipment and communication equipment failures can occur that prevent customers and the Company from remotely obtaining daily or discretionary meter readings.

Q. Describe how the Company resolves a telemetering equipment failure.

A. Generally, a meter reading retrieval failure during daily telemetering poling will prompt an investigation by the Company to confirm a possible equipment problem. Depending on the circumstance, the customer or Company field personnel will be alerted of the failure and possible causes. Failures associated with Company equipment such as low battery power or modem failure can be resolved quickly by the Company whereas failures associated with the customer's equipment often result in coordination and repair delays.

Q. What are the typical customer communication equipment problems?

A. The problem is often related to a failure in the customer's communication equipment (POTS line or cellular device) which interrupts the Company's ability to retrieve meter readings.

Q. What is the expectation of the customer when their communication equipment fails?

A. The customer must resolve their communication equipment failure. In the interim, the customer is expected to visit its meter site, obtain a daily meter reading, and submit the reading to the Company each day.

Q. During these circumstances, are customers diligent with providing daily meter readings?

A. Not necessarily. Despite the Company's efforts to encourage customers to resolve the problem with their telecommunication provider, the customer often does not immediately address the telecommunication outage nor provide the Company with daily meter readings.

Q. What are the possible consequences of repair delays?

A. Telemetering POTS or cellular telephone service requires customer involvement and coordination with their third-party service provider that often results in repair delays, inaccurate meter readings, customer consumption discrepancies and billing adjustments. Lengthy delays can result in customer billing adjustment disputes.

Q. What is the Company's proposal to improve meter reading equipment reliability to reduce repair delays, customer consumption discrepancies and possible customer billing disputes?

A. The Company proposes to assume from its customers the responsibility for providing meter-related communication services to the existing 137 sites and future telemetered sites. The Company would convert existing POTS telemetered sites to cellular telemetered sites over the next five years. The Company is proposing to manage the communication system connected to the customer's telemetering device and believes cellular communication is superior to traditional POTS technology.

Q. Would customers still be responsible for the provision of connectivity to their meter data collection equipment?

A. No. The customer will not be required to provide a dedicated phone line or cellular service to the customer's meter location for the purpose of providing meter data to the Company on a real-time basis. The Company will develop a plan that will allow all DMT customers currently with cellular telemetering to terminate their cellular service and have that service replaced by Company subscribed cellular service. The Company will pay the monthly cellular service charge rather than the customer paying for their own cellular service. For those customers that provide a dedicated POTS line, the Company will coordinate with the customer for the abandonment of the POTS telemetering and replace it with cellular telemetering equipment and service at no cost to the customers. New customers requesting telemetering equipment will pay the Company for installing new telemetering equipment, as required in the Gas Transportation Operating Procedures

Manual, but will not be required to arrange or provide cellular communication services for the telemetering equipment.

Q. What is the projected annual cost to the Company for providing all current customers with cellular telemetering communication service?

A. The Company estimates the annual cost for the current 137 sites to equal $45,000 plus annual cellular service inflation.

Q. What is the capital cost to convert upgrading existing POTS telemetering equipment to cellular telemetered equipment?

A. The Company estimates the cost to upgrade the current 115 POTS sites to cellular telemetered equipment at approximately $525,000 over the next five years.

Q. Given the costs of this proposal, what are the anticipated benefits to the customer and the Company?

A. The Company's proposal to assume responsibilities and costs associated with customer telemetering will allow the Company to efficiently troubleshoot and resolve telemetering problems to minimize interruptions to remote anytime meter reading access by the customer and the Company. The Company believes this proposal will offer greater customer satisfaction by providing more reliable consumption information that will improve daily and monthly consumption accuracy and reduce billing disputes.

V. CASH-OUT PRICING PUBLICATION PROPOSAL

Q. Please describe the Company's third proposal, related to the cashout pricing publication used for the DMT, MMNGS, and SATS transportation programs.

A. The Company is proposing to change publication used to determine the Monthly Market Index, which is used in calculating the Market Price of Natural Gas for cashout calculations. Currently the Company's tariff references the SNL Natural Gas Index publication (Page No. 35E). The Company proposes to change to the Platts Gas Daily publication. The Market Index Point will remain Tennessee, Zone 4-200 Leg.

Q. What is the Benefit of changing to the Platts Gas Daily publication?

A. The Platts Gas Daily publication is widely recognized as the industry standard for referencing and tracking index prices at various market index locations.

Q. Are there any significant differences between the daily and monthly index prices published by SNL Natural Gas Index and Platts Gas Daily?

A. Both publications report comparable index pricing.

Q. Does this conclude your testimony at this time?

A. Yes it does.

NATIONAL FUEL EXHIBIT DJC-1

Pro-Forma Tariff Pages

NATIONAL FUEL GAS
DISTRIBUTION CORPORATION

Pro-Forma Supplement No. to
Gas - Pa. P.U.C. No. 9
Ninth Revised Page No. 96
Canceling Eighth Revised Page No. 96

SPECIAL PROVISIONS

1. A customer that has Bypass Facilities and that desires service under this rate schedule must enter into an Agreement for Service under Rate Schedule BP that specifies a volume of gas equal to, or greater than, the volume of gas specified in the Service Agreement under this rate schedule.

2. As used in this Rate schedule, the term "Bypass Facilities" does not include facilities that enable a customer to obtain "Self-Help" gas.

   "Self-Help" gas refers to gas produced by the customer from gas reserves and wells owned by the customer on a tract of land owned by the customer that is contiguous to the tract of land in which the customer's manufacturing plant facilities are located.

3. SB customers shall be subject to a surcharge equal to 25 percent of the retail rates of the applicable sales rate schedule to volumes purchased by transportation customers (in excess of volumes contracted for under Rate Schedule SB) during the billing month ending in December, January, February or March and a surcharge equal to 10 percent of the retail rates of the applicable sales rate schedule to volumes purchased by transportation customers (in excess of volumes contracted for under Rate Schedule SB) during the remaining billing months when overruns by transportation customers are authorized by Company. The rates for sales of gas shall include the Distribution Charges, Gas Adjustment Charge, and the Natural Gas Supply Charge under the sales rate schedule that applies to the customer and the applicable surcharge percentage set forth above. In months when the sum of the Natural Gas Supply Charge and the Gas Adjustment Charge is less than the MMI, the applicable sales rate shall be equal to the sum of the Distribution Charges, the MMI plus all transportation costs to the Company's City Gate, and the applicable surcharge percentage applied to this rate.

4. SB Transportation MMT customers shall be subject to a penalty of Charges for Daily City Gate Underdeliveries applicable to MMNGS Suppliers plus the higher of $25 per Dth or the DMI for that day plus all transportation costs to the Company's City Gate when Company has announced that overrun service is not available. (C)

(C)

Deleted: SB Transportation DMT customers shall be charged the higher of: (1) the rate determined in item 3 above or (2) the Charges for Daily City Gate Underdeliveries applicable to MMNGS Suppliers plus the higher of $25 per Dth or the DMI for that day plus all transportation costs to the Company's City Gate when Company has issued an OFO that includes a Restriction on Access to Daily Metered Imbalances or announced that overrun service is not available.

(C) Indicates Change

Issued: Effective:

Pro-Forma
NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Gas - Pa. P.U.C. No. 9
Original Page No. 109

RATE SCHEDULE FOR DAILY METERED TRANSPORTATION SERVICE

DEFINITIONS

(1) Gas Service Customer - A Gas Service Customer is an entity that is attached to the Company's lines and uses gas in its operations or in its premises;
(2) DMT - Daily Metered Transportation
(3) DMT Service Customer - Any entity that has executed a DMT Service Agreement with the Company for transportation of gas by the Company.

AVAILABILITY OF SERVICE

If all of the qualifications (a) through (e) set forth below are met, any entity will be considered a DMT Service Customer under this Rate Schedule.

(a) The entity that will receive gas transported by the Company (1) has a volumetric requirement of at least 5,000 Mcf per year or (2) belongs to a buyer group of no more than ten customers whose combined usage is at least 5,000 Mcf per year, provided, however, that larger buyer groups shall be permitted upon the mutual agreement of the Company and the customers;

(b) DMT Service Customers that are Priority 1 customers must contract with the Company for Priority Standby Service to meet the entire needs of its facility.

(c) A DMT service agreement must be executed by the DMT Service Customer in the form prepared by the Company (the "Service Agreement");

(d) The DMT Service Customer has obtained, or has agreed to obtain, a supply of gas, of a quality acceptable to the Company, from any source of gas;

(e) The DMT Service Customer has made, or has caused to be made, arrangements by which such volumes of gas can be delivered, either directly or by displacement, on a firm or interruptible basis, into the Company's distribution system; and

(f) If facilities are required for furnishing of DMT service, in addition to facilities that are required for furnishing of gas service, to a Gas Service Customer, the DMT Service Customer shall have paid, in full, for any additional facilities required to be constructed for furnishing of DMT service, which payment shall not

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Pro-Forma Supplement No. to
Gas - Pa. P.U.C. No. 9
NATIONAL FUEL GAS First Revised Page No. 114
DISTRIBUTION CORPORATION Cancelling Original Page No. 114

DAILY IMBALANCE CHARGES

A Daily Surplus Imbalances

As used in this Rate Schedule, "surplus imbalances" shall mean the amount by which the volume of gas delivered, to the Company for the Customer's account during the day, after adjustment for line losses and after elimination of volumes purchased from the Customer by the Company, exceeds the total amount of transportation service volumes taken by the Customer from the Company during the day. Such surplus imbalance shall be computed each day. The rates set forth below shall be applied to the daily surplus imbalance volume occurring during each day of the billing month.

If on any day a DMT Customer's/NGS's imbalance exceeds 10% and the combined imbalance of all DMT Customers is above the initial surplus tolerance band, the DMT Customer's/NGS's surplus in excess of 10% will be purchased by the Company ("cashed-out") according to the following price schedule:

10% to 15% at 90% of Index
15% to 20% at 85% of Index
> than 20% at 60% of Index

B Daily Deficiency Imbalances

As used in this Rate Schedule, "deficiency imbalances" shall mean the amount by which the volume of gas delivered, to the Company for the Customer's account during the day after adjustment for line losses is less than the total amount of gas consumed by the Customer each day. The rates set forth below shall be applied to the daily deficiency volume occurring during each day of the billing month.

If on any day a DMT Customer's/NGS's deficiency exceeds 10% and the combined deficiency imbalance of all DMT Customers exceeds 10% below the initial deficiency tolerance band, the DMT Customer's/NGS's deficiency in excess of 10% will be cashed-out according to the following price schedule:

10% to 15% at 110% of Index
15% to 20% at 115% of Index
> than 20% at 140% of Index

Month End Imbalance Cash Out

At the end of the month, a DMT Customer's/NGS's Daily Surplus Imbalances and Daily Deficiency Imbalances that were not cashed-out will be summed into a net imbalance volume for the DMT Customer/Marketer. A Month End Deficiency Imbalance occurs when the net imbalance volume is a quantity less than zero (imbalance due to the Company) and a Month End Surplus Imbalance occurs when the net imbalance volume is a quantity greater than zero(imbalance due from the Company). A DMT Customer/NGS may exchange a month end Imbalance under its DMT Service Agreement as set forth in Rule 30. Month End Surplus Imbalances and Month End Deficiency Imbalances not resolved via Exchange of Net Imbalances will be cashed-out pursuant to Rule 30.

Index Price

The Index for the cash out of daily imbalances is the Daily Index set forth in Rule 29.

OPERATIONAL FLOW ORDERS

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¶
¶
If the DMT Service Customer in any billing month has overdeliveries in excess of two percent of the volume of gas transported for the customer in the billing month, the Customer shall be subject to additional charges each billing month. For a maximum daily overdelivery volume up to 37% of the volume of DMT service gas transported to the Customer by the Company in the billing month, the charge for overdeliveries shall be $0.6351 per Mcf in excess of two percent of the volume of gas transported for the customer in the billing month.¶
¶
¶
For overdeliveries equal to or more than 37% of the volume of DMT service gas transported to the Customer by the Company during the billing month, the charge for such excess overdeliveries shall be $0.7624 per Mcf.

The Company reserves the right to issue Operational Flow Orders as necessary to preserve the operational integrity of its system. Such OFOs may include, but shall not be limited to the following: a requirement to flow gas to the citygate, a reduction in Daily City Gate delivery tolerance and a requirement to flow gas to the Supplier's primary receipt points on NFGSC. (I)

The Company may also issue OFOs which apply to transportation Customers receiving daily metered service under SC 13 as follows:

a. Modifications of Daily Surplus or Deficiency Tiers

The Company may lower the percentage levels of the Daily Deficiency or Surplus tiers for SC 13 service during an OFO. The Company may change the first imbalance tiers for Daily Surplus or Deficiency Imbalances as circumstances warrant. The first imbalance tier for Daily Surplus or Deficiency Imbalances may be reduced to a range of 0-2% and the second tier will be correspondingly modified to a range of 2-15%.

b. Modifications of Daily Deficiency Rate during an OFO

When the Company declares a deficiency OFO for Deficiency Imbalances outside the first tier, the applicable charge shall be the higher of the rate under SC 11 or the rate produced by the index calculation at the applicable tier level. Electric generation transportation customers shall be charged $25 per Mcf additional to the otherwise applicable OFO rate.

c. Suspension of "No Harm, No-Foul" Rule

During an OFO, the "no harm, no-foul" rule shall not apply to Deficiency Imbalances from 0-2%.

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Deleted: The Company may also issue Operational Flow Orders ("OFOs") which apply to transportation customers receiving service under this rate schedule as follows:¶
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A Restriction on Access to Daily Metered Imbalances ¶
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OFOs may be issued to customers receiving service under this rate schedule to assure that adequate supplies are delivered to the Company. During such period, DMT customers shall not be permitted to use banked gas to cover daily underdeliveries in excess of the 2% tolerance during the term of the OFO. Furthermore, in the event an OFO is issued, metered usage in excess of 102% of confirmed deliveries on behalf of the DMT customer to Distribution's city gate, less line loss, shall be deemed a sale of gas by the Company to the customer. All provisions related to the price for such sales, including charges under Rate SB-Standby Service, shall apply.¶

(I) Indicates Increase

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(I)

MAXIMUM DAILY QUANTITY

The "Maximum Daily Quantity" shall be the maximum volume of gas, expressed in Mcf, as set forth in a DMT Service Customer's Service Agreement, may be delivered into the Company's distribution system, during any twenty-four hour period, for transportation by the Company to such Customer as transportation service under this rate schedule. The Company, in its sole discretion and upon request of a DMT Service Customer, may agree to receive and to transport, during any twenty-four period, a volume in excess of the Maximum Daily Quantity as set forth in a transportation Service Customer's Service Agreement. During any hour of any twenty-four hour period, the Company shall not be required to receive and to transport more than 1/24 of the Maximum Daily Quantity as set forth in a Transportation Service Customer's Service Agreement.

Deleted: B. Waiver of Overdelivery Charges¶
¶
The Company may, in its discretion, waive DMT overdelivery charges during or following colder than normal periods and to waive undelivery premiums during or following warmer than normal periods

NATIONAL FUEL GAS
DISTRIBUTION CORPORATION

Pro-Forma Supplement No. to
Gas - Pa. P.U.C. No. 9
One-Hundred-Fourteenth Revised Page No. 117
Canceling One-Hundred-Twelfth and One-Hundred-Thirteenth Revised Page No.117

E. In the event of interruption or curtailment of transportation service, pursuant to items C and D, above, and during such period of interruption or curtailment, the DMT Service Customer must sell to the Company all or a portion of the DMT Service Customer's supply of gas at the higher of (1) the Transportation Service Customer's cost of purchased gas at the point of delivery to the Company or (2) the Company's average cost of purchased gas per Mcf, as determined based upon the Company's Section 1307(f) Rate, which is $5.6451. (I)

F. If a Gas Service Customer receiving gas transported by the Company uses less than the amount of gas delivered into the Company's system for transportation to such Customer ("excess deliveries"), the Gas Service Customer receiving gas transported by the Company may use such gas during the banking/balancing period defined below, following which the Company shall have the right, but not the obligation, to purchase remaining excess deliveries of gas from the DMT service Customer at a rate equal to the lowest of (1) the cost at which it was acquired by the DMT Service Customer, including pipeline transportation charges, or (2) the Company's average commodity delivered cost of gas to National Fuel Gas Supply Corporation, or (3) the Company's average commodity cost of locally produced gas during the month when excess deliveries were received by the Company. The cost at which the DMT Service Customer acquired the gas will be determined from such Customer's contract with the supplier or by a sworn affidavit setting forth the Customer's cost of gas, including cost of delivery of such gas to the Company's system. Upon request by the Company, the DMT Service Customer will be required to furnish to the Company the DMT service Customer's choice of (1) a copy of this contract or (2) an affidavit. The banking/balancing period shall be the three billing months after the billing month in which the Company received excess deliveries in behalf of the Customer.

Deleted: G. "Underdeliveries" are volumes of gas taken from the Company by a Gas Service Customer in excess of the sum of (1) any excess deliveries of the customer at the beginning of the day and (2) the volume of gas delivered to the Company for the customer's account, after adjustment for line losses less volumes of volumes of gas determined to be sales by the Company to the customer. Cumulative underdeliveries, as determined each day, in excess of two percent of the volume of gas delivered by the Company to the customer that day, shall be a sale of gas by the Company to the customer under the applicable rate schedule plus applicable surcharges as set forth in Rate Schedule SB Special Provisions and shall not be recharacterized as transportation service under any circumstances. Cumulative underdeliveries of not more than two percent of the volume of gas delivered to a customer by the Company on any day may be offset by volumes of gas delivered to the Company for the customer's account, after adjustment for line losses, in excess of the volume of gas taken by the customer from the Company on subsequent days within the same billing month.

(D) Indicates Decrease (I) Indicates Increase

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NATIONAL FUEL GAS
DISTRIBUTION CORPORATION

Pro-Forma Supplement No. to
Gas - Pa. P.U.C. No. 9
Sixth Revised Page No. 118
Canceling Fifth Revised Page No. 118

H. Service under this rate schedule shall be available only to the extent that there is sufficient capacity for such service in those portions of the Company's system affected by providing of transportation service including but not limited to, that portion of the Company's system where gas is delivered to the Company and that portion of the Company's system where gas is delivered to the Customer. In determining the Company's ability to provide transportation service, sufficient capacity in the Company's system shall be assumed. If service shall not be supplied, based upon insufficient capacity, the burden shall be on the Company to prove such capacity limitation.

I. Where gas is received by the Company for transportation service pursuant to this Rate Schedule, title to such gas shall remain vested in the Transportation Service Customer for which such gas was received for transportation. The Company's furnishing transportation service for a Transportation Service Customer shall be complete upon delivery of gas received for transportation service, except as provided in E and F, above.

J. The Company shall not be liable, under any circumstances or in any respect, to a Gas Service Customer, Transportation Service Customer, a producer of gas or any other person or entity for damages arising either directly or indirectly from interruption, curtailment or termination of transportation service.

Deleted: K. Revenues produced by charges to DMT customers for overdeliveries of transportation gas to such customers shall be treated in accordance with Paragraph (b)(11) of Rider "A".

L. Customers who contract for transportation service under this Rate Schedule shall have the right thereafter to purchase gas from the Company only to the extent that they have contracted for firm service under Rate Schedule SB for Standby Service or under Rate Schedule PSB for Priority Standby Service. Purchases of gas from the Company by transportation service customers who have not contracted for service under Rate Schedule PSB shall be subject to both the charges under the applicable sales rate schedule and all provisions of the Rate Schedule SB, including the Special Provisions.

M. Customers who elect to schedule their own gas supplies via Company's internet accessible Transportation Scheduling System and/or wish to access and/or obtain each day meter readings of the volume of gas delivered to the Company for the Customer's account and the volume of gas from the Company used by the Customer each day shall execute a Data Security Agreement pursuant to Tariff Rule 33. (C)

(C) Indicates Change

Issued: Effective:

NATIONAL FUEL GAS
DISTRIBUTION CORPORATION

Pro-Forma Supplement No. to
Gas - Pa. P.U.C. No. 9
Original Page No. 146D

CHARGES UNDER OTHER RATE SCHEDULES

The Gas Service Customer receiving gas transported by the Company under this rate schedule shall pay all charges under all other applicable rate schedules and riders, irrespective of whether such Customer, in any billing period, receives only gas transported by the Company, and such Customer shall pay rates under all other applicable rate schedules for any service furnished to the Customer in addition to transportation service under this Rate Schedule. The DMLMT Customer shall be charged the customer charge under Rate Schedule LIS. The Customer may receive service under Rate Schedule LIS if the Customer so requests and the Company has sufficient gas supply available, and other customers or the Company would not be harmed by the Company providing this service to the Customer.

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Deleted: As used in this Rate Schedule, "overdeliveries" shall mean the cumulative amount by which the volume of gas delivered to the Company for the Customer's account, since the commencement of transportation service by the Company for the Customer under any rate schedule, after adjustment for line losses and after elimination of volumes purchased from the Customer by the Company, exceeds the total amount of transportation service volumes taken by the Customer from the Company under any rate schedule since the commencement of transportation service for the Customer by the Company. Such cumulative overdelivery balance shall be computed each day, and the rates set forth below shall be applied to the maximum daily overdelivery volume occurring during the billing month.¶
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If the DMLMT Service Customer in any billing month has overdeliveries in excess of two percent of the volume of gas transported for the customer in the billing month, the Customer shall be subject to additional charges each billing month. For a maximum daily overdelivery volume up to 37% of the volume of DMLMT service gas transported to the Customer by the Company in the billing month, the charge for overdeliveries shall be $0.6351 per Mcf in excess of two percent of the volume of gas transported for the customer in the billing month.¶
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¶
For overdeliveries equal to or more than 37% of the volume of DMLMT service gas transported to the Customer by the Company during the billing month, the charge for such excess overdeliveries shall be $0.7624 per Mcf.¶
¶
The Company may reduce or eliminate the overdelivery charges and may modify the operational flow order's and daily delivery quantity ("DDQ") requirements of customers receiving service under this rate schedule in order to meet the competitive circumstances for alternative fuels or bypass situations as set forth in this Service Classification.

OPERATIONAL FLOW ORDERS

The Company may also issue OFOs which apply to transportation customers receiving service under this rate schedule as follows:

A

MAXIMUM DAILY QUANTITY

The "Maximum Daily Quantity" shall be the maximum volume of gas, expressed in Mcf, as set forth in a DMLMT Service Customer's Service Agreement, may be delivered into the Company's distribution system, during any twenty-four hour period, for transportation by the Company to such Customer as transportation service under this rate schedule. The Company, in its sole discretion and upon request of a DMLMT Service Customer, may agree to receive and to transport, during any twenty-four period, a volume in excess of the Maximum Daily Quantity as set forth in a transportation Service Customer's Service Agreement. During any hour of any twenty-four hour period, the Company shall not be required to receive and to transport more than 1/24 of the Maximum Daily Quantity as set forth in a Transportation Service Customer's Service Agreement.

BILLING

Monthly charges, for transportation service pursuant to this rate schedule, are subject to the Late Payment Charges set forth in Section 16 of the Rules and Regulations of this Tariff.

Deleted: Restriction on Access to Daily Metered Imbalances ¶
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OFOs may be issued to customers receiving service under this rate schedule to assure that adequate supplies are delivered to the Company. During such period, DMLMT customers shall not be permitted to use banked gas to cover daily underdeliveries in excess of the 2% tolerance during the term of the OFO. Furthermore, in the event an OFO is issued, metered usage in excess of 102% of confirmed deliveries on behalf of the DMLMT customer to Distribution's city gate, less line loss, shall be deemed a sale of gas by the Company to the customer. All provisions related to the price for such sales, including charges under Rate SB-Standby Service, shall apply.¶
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B. Waiver of Overdelivery Charges¶
¶
The Company may, in its discretion, waive DMLMT overdelivery charges during or following colder than normal periods and to waive undelivery premiums during or following warmer than normal periods.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

Pro-Forma Supplement No. to
Gas - Pa. P.U.C. No. 9
Eighty-Fourth Revised Page No. 146G
Canceling Eighty-Second and Eighty-Third Revised Page No. 146G

E. In the event of interruption or curtailment of transportation service, pursuant to items C and D, above, and during such period of interruption or curtailment, the DMLMT Service customer must sell to the Company all or a portion of the DMLMT Service Customer's supply of gas at the higher of (1) the Transportation Service Customer's cost of purchased gas at the point of delivery to the Company or (2) the Company's average cost of purchased gas per Mcf, as determined based upon the Company's Section 1307(f) Rate which is $5.6451.

(D) Indicates Decrease (I) Indicates Increase

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Deleted: F. If a Gas Service Customer receiving gas transported by the Company uses less than the amount of gas delivered into the Company's system for transportation to such Customer ("excess deliveries"), the Gas Service Customer receiving gas transported by the Company may use such gas during the banking/balancing period defined below, following which the Company shall have the right, but not the obligation, to purchase remaining excess deliveries of gas from the DMLMT Service Customer at a rate equal to the lowest of (1) the cost at which it was acquired by the DMLMT Service Customer, including pipeline transportation charges, or (2) the Company's average commodity delivered cost of gas to National Fuel Gas Supply Corporation, or (3) the Company's average commodity cost of locally-produced gas during the month when excess deliveries were received by the Company. The cost at which the DMLMT Service Customer acquired the gas will be determined from such Customer's contract with the supplier or by a sworn affidavit setting forth the Customer's cost of gas, including cost of delivery of such gas to the Company's system. Upon request by the Company, the DMLMT service Customer will be required to furnish to the Company the DMLMT Service Customer's choice of (1) a copy of this contract or (2) an affidavit. The banking/balancing period shall be the three billing months after the billing month in which the Company received excess deliveries in behalf of the Customer.

Deleted: G. "Underdeliveries" are volumes of gas taken from the Company by a Gas Service Customer in excess of the sum of (1) any excess deliveries of the customer at the beginning of the day and (2) the volume of gas delivered to the Company for the customer's account, after adjustment for line losses less volumes of gas determined to be sales by the Company to the customer. Cumulative underdeliveries, as determined each day, in excess of two percent of the volume of gas delivered by the Company to the customer that day, shall be a sale of gas by the Company to the customer under the applicable rate schedule plus applicable surcharges as set forth in Rate Schedule SB Special Provisions and shall not be recharacterized as transportation service under any circumstances. Cumulative underdeliveries of not more than two percent of the volume of gas delivered to a customer by the Company on any day may be offset by volumes of gas delivered to the Company for the customer's account, after adjustment for line losses, in excess of the volume of gas taken by the customer from the Company on subsequent days within the same billing month.

NATIONAL FUEL GAS
DISTRIBUTION CORPORATION

Pro-Forma Supplement No. to
Gas - Pa. P.U.C. No. 9
Fourth Revised Page No. 146H
Canceling Third Revised Page No. 146H

H. Service under this rate schedule shall be available only to the extent that there is sufficient capacity for such service in those portions of the Company's system affected by providing of transportation service including but not limited to, that portion of the Company's system where gas is delivered to the Company and that portion of the Company's system where gas is delivered to the Customer. In determining the Company's ability to provide transportation service, sufficient capacity in the Company's system shall be assumed. If service shall not be supplied, based upon insufficient capacity, the burden shall be on the Company to prove the capacity limitation.

I. Where gas is received by the Company for transportation service pursuant to this Rate Schedule, title to such gas shall remain vested in the Transportation Service Customer for which such gas was received for transportation. The Company's furnishing transportation service for a Transportation Service Customer shall be complete upon delivery of gas received for transportation service, except as provided in E and F, above.

J. The Company shall not be liable, under any circumstances or in any respect, to a Gas Service Customer, Transportation Service Customer, a producer of gas or any other person or entity for damages arising either directly or indirectly from interruption, curtailment or termination of transportation service.

Deleted: K. Revenues produced by charges to DMLMT customers for overdeliveries of transportation gas to such customers shall be treated in accordance with Paragraph (b)(11) of Rider "A".

L. Customers who contract for transportation service under this Rate Schedule shall have the right thereafter to purchase gas from the Company only to the extent that they have contracted for firm service under Rate Schedule SB for Standby Service. Purchases of gas from the Company by transportation service customers under this rate schedule shall be subject to both the charges under the applicable sales rate schedule and all provisions of the Rate Schedule SB, including the Special Provisions.

M. The Company may establish a BTU conversion factor in the DMLMT service agreement for volumes of gas to be received by the Customer at a factor different from the system average BTU conversion factor applied to other transportation customers.

N. Customers who elect to schedule their own gas supplies via Company's internet accessible Transportation Scheduling System and/or wish to access and/or obtain each day meter readings of the volume of gas delivered to the Company for the Customer's account and the volume of gas from the Company used by the Customer each day shall execute a Data Security Agreement pursuant to Tariff Rule 33.

(C) Indicates Change

I&E Statement No. 1
Witness: Christopher Keller
NON-PROPRIETARY

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

Docket No. R-2025-3059428

Direct Testimony

of

Christopher Keller

Bureau of Investigation and Enforcement

Concerning:

Operating and Maintenance Expenses
Taxes Other Than Income
Cash Working Capital
Energy Efficiency Pilot Program

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INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Christopher Keller. My business address is Pennsylvania Public Utility Commission, Commonwealth Keystone Building, 400 North Street, Harrisburg, PA 17120.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by the Pennsylvania Public Utility Commission (Commission) in the Bureau of Investigation & Enforcement (I&E) as a Fixed Utility Financial Analyst.

Q. SUMMARIZE YOUR EDUCATION AND EMPLOYMENT HISTORY.

A. An outline of my education and employment history is attached as Appendix A.

Q. PLEASE DESCRIBE THE ROLE OF I&E IN RATE PROCEEDINGS.

A. I&E is responsible for protecting the public interest in proceedings before the Commission. I&E's analysis in this proceeding is based on its responsibility to represent the public interest. This responsibility requires balancing the interests of ratepayers, the regulated utility, and the regulated community as a whole.

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A. The purpose of my direct testimony is to review the base rate filing of National

Fuel Gas Distribution Company (NFG or Company), and make recommended adjustments to NFG's proposed operating and maintenance (O&M) expenses, taxes, and cash working capital (CWC) for the fully projected future test year (FPFTY) ending October 31, 2027. I also present the overall I&E recommended revenue requirement based on my adjustments and the adjustments of the other I&E witnesses identified below.

Q. DOES YOUR DIRECT TESTIMONY INCLUDE AN EXHIBIT?

A. Yes. I&E Exhibit No. 1 contains schedules that support my direct testimony.

Q. PLEASE SUMMARIZE YOUR RECOMMENDED O&M ADJUSTMENTS.

A. The following table summarizes my recommended adjustments.

	Company Claim	I&E Adjustment	I&E Recommended Allowance
O&M Expenses:			
Rate Case Expense	$344,000	($137,600)	$206,400
Net Labor Expense	$40,592,056	($379,731)	$40,212,325
Payroll Taxes	$2,399,564	($22,670)	$2,376,894
Stock-Based Compensation	$1,429,959	($909,281)	$520,678
Membership Dues	$234,266	($21,968)	$212,298
Total O&M Expense Adjustments		($1,471,259)	
Rate Base Adjustments:			
Cash Working Capital	$6,754,827	($111,005)	$6,643,822
Total Rate Base Adjustments		($111,005)	

OVERALL I&E RECOMMENDED REVENUE REQUIREMENT

Q. WHAT TEST YEARS HAS NFG USED IN THIS PROCEEDING?

A. NFG used the year ended September 30, 2025 as the historic test year (HTY), the year ending September 30, 2026 as the future test year (FTY), and the year ending October 31, 2027 as the FPFTY in this proceeding.

Q. SUMMARIZE THE COMPANY'S OVERALL CLAIMED REVENUE REQUIREMENT.

A. The Company's base rate case filing was submitted on January 28, 2026, requesting an increase of $19,680,000 to claimed present rate revenues of $265,524,000 resulting in a total overall revenue requirement of $285,204,000.[1]

Q. WHAT IS I&E'S TOTAL RECOMMENDED REVENUE REQUIREMENT?

A. I&E's total recommended revenue requirement for the Company is $276,615,000. This recommended revenue requirement represents an increase of $11,091,000 to the present rate revenues of $265,524,000. This total recommended allowance incorporates my adjustments made in this direct testimony to O&M expenses, taxes, and cash working capital and those recommended adjustments made in the direct testimony of I&E witness Drew Breuning.[2]

[1] NFG Book V, Exhibit A – FPFTY, Schedule A-1.
[2] I&E Statement No. 2.

National Fuel Gas Distribution Company		TABLE I			
R-2025-3059428		INCOME SUMMARY			
($ in Thousands)					
	10/31/27	INVESTIGATION & ENFORCEMENT			
	Proforma	[----------			----------]
	Present Rates	Adjustments	Present Rates	Allowances	Proposed
	$	$	$	$	$
Operating Revenue	265,524	0	265,524	11,091	276,615
Deductions:					
O&M Expenses	204,048	-1,472	202,576	172	202,748
Depreciation	25,302	0	25,302		25,302
Taxes, Other	2,489	0	2,489	0	2,489
Income Taxes:					
Current State	0	76	76	818	894
Current Federal	-1,717	198	-1,519	2,121	602
Deferred Taxes	-623	0	-623		-623
ITC	0	0	0		0
Total Deductions	229,499	-1,198	228,301	3,111	231,412
Income Available	36,025	1,198	37,223	7,980	45,203
Rate Base	571,582	-111	571,471	0	571,471
Rate of Return	6.30%		6.51%		7.91%

RATE CASE EXPENSE

Q. BRIEFLY DESCRIBE THE NATURE AND TYPES OF EXPENDITURES TYPICALLY ALLOWED AS A PART OF A REGULATED UTILITY'S OVERALL RATE CASE EXPENSE.

A. The nature and types of individual expenditures that comprise a utility's allowable claim for rate case expense are those directly incurred to compile, present, and defend a utility's request for a base rate increase before the Commission. The actual expenditures and estimated costs typically found in an allowable rate case

expense claim include legal fees for outside counsel, fees to outside consultants, and the cost of printing, document assembly, and postage.

Q. HOW HAS THE COMMISSION TRADITIONALLY TREATED RATE CASE EXPENSE FOR RATEMAKING PURPOSES?

A. The Commission has historically stated that it considers prudently incurred rate case expense as an ongoing expense, occurring at irregular intervals, related to the rendering of utility service. The Commission has also cited the importance of considering the involved utility's history regarding the frequency of rate case filings as an essential element to determine the normalized level of rate case expense for ratemaking purposes.

Q. HOW IS THE FREQUENCY OF RATE CASE FILINGS DETERMINED?

A. The frequency is determined by calculating the average number of months between the utility's most recent rate case filings.

Q. WHAT IS THE COMPANY'S CLAIM FOR RATE CASE EXPENSE?

A. NFG's claim for rate case expense is $344,000.[3]

[3] NFG Book V, Exhibit A – FPFTY, Schedule D-6.

Q. WHAT IS THE BASIS FOR THE COMPANY'S CLAIM?

A. NFG has estimated its total rate case expense amount to be $1,032,000 and is requesting a normalization period of three years.[4] This produces a normalized claim of $344,000 ($1,032,000 ÷ 3). The Company states that the three-year normalization period was used as it aligns with the time interval between the Company's late base rate case and this proceeding.[5]

Q. DO YOU AGREE WITH THE COMPANY'S CLAIM?

A. No. I disagree with the Company's claimed three-year recovery period.

Q. WHAT IS YOUR RECOMMENDATION FOR RATE CASE EXPENSE?

A. I recommend that NFG's rate case expense be normalized over a period of five years or 60 months resulting in an annual expense of $206,400 [($1,032,000 ÷ 60 months) x 12 months], or a reduction of $137,600 ($344,000 - $206,400) to the Company's claim.

Q. WHY DO YOU DISAGREE WITH THE PROPOSED THREE-YEAR RECOVERY PERIOD?

A. I disagree with the claimed three-year recovery period because it is not supported by the Company's historic filing frequency. The proposed recovery period fails to

[4] NFG Book V, Exhibit A – FPFTY, Schedule D-6.
[5] NFG Statement No. 3, p. 16, lines 5-6.

properly rely upon NFG's historic filing frequency and is speculative in nature. As such, it should not be relied upon to determine the appropriate period to apply the normalization treatment.

Q. FURTHER EXPLAIN YOUR RECOMMENDED FIVE-YEAR NORMALIZATION PERIOD FOR RATE CASE EXPENSE.

A. In contrast to the Company's proposed three-year period, I recommend a five-year or 60-month normalization period, which is a reasonable interval given NFG's actual base rate filing history. The Company's three most recent base rate case filing dates and corresponding details for the current filing are as follows:[6]

Docket No.	Date Filed	Interval
R-2025-3059428	January 28, 2026	39 months
R-2022-3035730	October 28, 2022	197 months
R-00061493	May 31, 2006	20 months
R-00049656	September 15, 2004	

Using the Company's last three base rate case filing dates and the date of the current filing, an average interval is computed to be 85 months ((39 mo. + 197 mo. + 20 mo.) ÷ 3 intervals). As demonstrated above, NFG's requested 36-month recovery period is unsupported by the Company's historic filing record. In contrast, my recommended five years (60 months) normalization period is a

[6] NFG Book I, Responses to Section 53.53 – III-I-Operating Expenses, III-I.4.d.

reasonable interval to utilize in consideration of NFG's historic filing record. Although the 60 month normalization period is shorter than the Company's actual 85 month filing frequency, my recommendation is in the public interest as it is more realistic than NFG's proposed 36-month period and it moderates the impact of the rate case filing interval of 197 months used in calculating the Company's average historical filing frequency.

Q. EXPLAIN WHETHER OTHER UTILITIES HAVE BEEN GRANTED A NORMALIZATION PERIOD BASED ON SPECULATION OF FUTURE FILINGS. IF SO, WHAT WAS THE RESULT?

A. In 2012, the Commission granted PPL Electric Utilities Corporation (PPL) permission to normalize its rate case expense over a 24-month period based on PPL's representations regarding its expected timing of future base rate case filings.[7] That base rate case was filed on March 30, 2012; however, despite PPL's representations, PPL did not file its next rate case until March 31, 2015, which was 36 months after the 2012 rate case filing. It should be noted that I&E's recommended normalization period in the 2012 PPL proceeding was a 32-month interval based on PPL's historic filing frequency.[8] The I&E recommendation in that instance produced a much more accurate result than relying on PPL's stated future intention to file a rate case.

[7] *PA. PUC v. PPL Electric Utilities Corporation*, Docket No. R-2012-2290597, pp. 47-48 (Order Entered December 28, 2012).

[8] I&E Statement No. 2, pp. 13-14 at Docket No. R-2012-2290597.

Q. ARE THERE ANY COMMISSION DECISIONS THAT SUPPORT YOUR RECOMMENDATION FOR A RATE CASE FILING INTERVAL BASED ON HISTORICAL FILING FREQUENCY?

A. Yes. The following six cases are the most recent instances where the Commission used the company's historic average filing frequency.

First, in a base rate case filed by Emporium Water Company, the Commission adopted the I&E recommended historic filing frequency finding in favor of I&E's recommended five-year normalization period based on a historic average filing frequency that was rounded down from 64 months.[9]

Second, in a base rate case filed by the City of DuBois, the Commission agreed with I&E's recommendation to use a historic filing frequency finding in favor of I&E's recommended 64-month normalization period, which matched the actual historic filing frequency.[10]

Third, in a base rate case filed by Columbia Gas of Pennsylvania, Inc. (Columbia Gas), the Commission held that the normalization period should align with the historic data rather than the company's intent to file its next rate case.[11]

Fourth, in a base rate case filed by PECO Energy Company – Gas Division, the Commission granted I&E's recommended five-year normalization period

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[9] *PA PUC v. Emporium Water Company*, Docket No. R-2014-2402324, p. 50 (Order Entered January 28, 2015).

[10] *PA PUC v. City of DuBois - Bureau of Water*, Docket No. R-2016-2554150, pp. 65-66 (Order Entered March 28, 2017); *PA PUC v. City of DuBois - Bureau of Water*, Docket No. R-2016-2554150, p. 13 (Order Entered May 18, 2017).

[11] *PA PUC v. Columbia Gas,* Docket No. R-2020-3018835, Opinion and Order, pp. 78-79 (Order Entered February 19, 2021).

rather than PECO's claim based on a three-year period because the Commission determined a normalization period based on actual historic filing frequency is more reliable than future speculation.[12]

Fifth, in a base rate case filed by Philadelphia Gas Works (PGW), the Commission agreed with I&E's recommended 53-month normalization period rather than PGW's claim based on a three-year period because the Commission determined a normalization period based on actual historic filing frequency and not based on PGW's future intention to file a rate case.[13]

Sixth, in a base rate case filed by Columbia Water Company, the Commission held that the normalization period should align with the historic filing frequency rather than that company's intent to file its next rate case and the intent to file a base rate case does not justify deviating from the Commission's practice of relying on historical filing frequency.[14]

Finally, in the most recent base rate case filed by Columbia Gas, the Commission based the normalization period on Columbia Gas' actual filing history and frequency of base rate case filings rather than Columbia Gas' anticipation to make annual filings for the foreseeable future.[15]

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[12] *PA PUC v. PECO Energy Company- Gas Division*, Docket No. R-2020-3018929, Opinion and Order, pp. 117-119 (Order Entered June 22, 2021).

[13] *PA PUC v. Philadelphia Gas Works*, Docket No. R-2023-3037933, Opinion and Order, pp. 65-66 (Order Entered November 9, 2023).

[14] *PA PUC v. Columbia Water Company*, Docket No. R-2023-3040258, Opinion and Order, p. 34 (Order Entered December 9, 2025).

[15] *PA PUC v. Columbia Gas,* Docket No. R-2025-3053499, Opinion and Order, p. 138 (Order Entered February 19, 2021).

NET LABOR EXPENSE

Q. WHAT IS INCLUDED IN NET LABOR EXPENSE?

A. NFG's net labor expense includes labor from the Company as well as labor from its subsidiaries, primarily NFG's New York Division (NFG NY) and National Fuel Gas Supply Corporation.[16]

Q. WHAT IS NFG'S CLAIM FOR NET LABOR EXPENSE?

A. In its filing, the Company's claim for net labor expense is $40,592,056.[17]

Q. DO YOU AGREE WITH THE COMPANY'S CLAIM FOR NET LABOR EXPENSE?

A. No.

Q. WHAT IS YOUR RECOMMENDATION FOR NET LABOR EXPENSE?

A. I recommend an allowance of $40,212,325 for net labor expense, or a reduction of $379,731 ($40,592,056 - $40,212,325) to NFG's claim.

Q. WHAT IS THE BASIS FOR YOUR RECOMMENDATION?

A. My recommendation for net labor expense is based on the removal of the portion of the executive bonus that is attributable to achieving financial goals. In the

[16] NFG Statement No. 3, p. 5, lines 5-8.
[17] NFG Book III, Exhibit ATF-4, Schedule 1, p. 2.

Company's filing, the total executive bonus included in net labor expense consists of executive bonuses for labor in New York of $605,614 and National Fuel Gas Supply Corporation of $249,973,[18] for a total executive bonus of $855,587 ($605,614 + $249,973).

In the confidential response to I&E-RE-52,[19] **{BEGIN PROPRIETARY}**, [redacted] **{END PROPRIETARY}**

[18] NFG Book III, Exhibit ATF-4, Schedule 3.
[19] I&E Exhibit No. 1, Schedule 1.
[20] NFG Book II, Standard Data Request RR-27, p. 5.
[21] I&E Exhibit No. 1, Schedule 2, pp. 4-5.

Based on the responses above, a significant portion of the executive bonuses in NFG's net labor expense claim are based on achieving financial goals and targets that serve primarily to benefit shareholders. Therefore, the portion of the executive bonuses attributable to financial goals should not be funded by the ratepayers as financial goals do not assist in providing safe and reliable service to ratepayers. Therefore, I recommend disallowance of any portion of the executive bonuses attributable to financial performance. This results in a recommended allowance of $40,212,325 for net labor expense, or a reduction of $379,731 ($40,592,056 - $40,212,325) to NFG's claim for net labor expense.

PAYROLL TAXES

Q. WHAT ARE PAYROLL TAXES?

A. Payroll taxes represent taxes imposed on employers and employees that are usually calculated as a percentage of the salaries paid to staff. Payroll taxes generally fall into two categories: (1) deductions from an employee's wages, and (2) taxes paid by the employer based on the employee's wages. NFG has made a claim in this filing for its employer share of those payroll taxes.

Q. WHAT IS THE COMPANY'S CLAIM FOR PAYROLL TAX EXPENSE?

A. In its filing, NFG's claim for payroll tax expense is $2,399,564.[22]

[22] NFG Book V, Exhibit A – FPFTY, Schedule D-9, column 5, lines 4-6.

Q. WHAT IS THE BASIS FOR THE COMPANY'S CLAIM?

A. NFG's claim consists of Social Security and Medicare taxes (together FICA), federal unemployment tax (FUTA), and state unemployment tax (SUTA).

Q. DO YOU AGREE WITH THE COMPANY'S CLAIM?

A. No.

Q. WHAT IS YOUR RECOMMENDATION FOR PAYROLL TAXES?

A. I recommend an allowance of $2,376,894 for payroll taxes, or a reduction of $22,670 ($2,399,564 - $22,670) to the Company's distribution claim.

Q. WHAT IS THE BASIS FOR YOUR RECOMMENDATION?

A. My recommended adjustment is based on recognition of the net labor expense reduction for my removal of the portion of executive bonuses related to financial goals and on the payroll tax rate applied to the Company's claim. My recommendation is calculated as follows:

FICA*	5.65%
FUTA*	0.03%
SUTA*	0.29%
Payroll Tax Rate	5.97%
I&E Net Labor Expense Adjustment from Above	$379,731
I&E Payroll Tax Recommended Adjustment	$22,670
*NFG Book V, Exhibit A – FPFTY, Schedule D-10, lines 3,6, 9	

STOCK-BASED COMPENSATION

Q. WHAT IS STOCK-BASED COMPENSATION?

A. The Company rewards stock-based compensation to certain employees in the form of restricted stock for supervisory staff and officers and performance shares for officers. NFG states that restricted stock is used as a retention tool to retain high-level salaried employees and officers through time-vested restricted stock. NFG also states that performance shares are stock-based compensation tied to long-term performance from total shareholder return, total return on capital, and emission reduction targets measured over a three-year period in comparison to peer companies.[23]

Q. WHAT IS THE COMPANY'S CLAIM FOR STOCK-BASED COMPENSATION?

A. The Company's stock-based compensation claim contains three parts, which are based on a three-year average amount for each.[24] The first is restricted stock for supervisory staff of $182,075. The second is restricted stock for officers of $290,746. The third is performance shares for officers of $957,138 for a total claim of $1,429,959 ($182,075 + $290,746 + $957,136).[25]

[23] NFG Statement No. 4, pp. 14-16.
[24] NFG Book III, Exhibit MPW-1, Schedule 2, p. 13.
[25] NFG Book III, Exhibit MPW-1, Schedule 2, p. 14.

Q. WHAT IS THE BASIS FOR THE COMPANY'S CLAIM?

A. NFG states that offering restricted stock benefits aids in retention of non-executives as well as officers by providing time-vested restricted stock, which requires those employees to remain with NFG over the vesting period, over three equal annual installments. Performance shares are connected to long-term performance such as total shareholder returns, total return on capital, and emission reduction targets over a three-year period which is compared to peer companies.[26]

Q. DO YOU AGREE WITH THE COMPANY'S CLAIM?

A. No.

Q. WHAT IS YOUR RECOMMENDATION FOR STOCK-BASED COMPENSATION?

A. I recommend an allowance of $520,678 for stock-based compensation, or a reduction of $909,281 ($1,429,959 - $520,678) to the Company's claim.

Q. WHAT IS THE BASIS FOR YOUR RECOMMENDATION?

A. In NFG's response to I&E-RE-35-D, the Company states that the restricted stock are time vested stock where there is not any other goals to be met other than the passage of time and that the performance shares are based on financial results with

[26] NFG Statement No. 4, pp. 14-16.

the exception of emission reduction targets which account for approximately 5% of performance shares issued.[27]

Based on the responses above, it is clear that performance shares in NFG's stock-based compensation expense claim are almost entirely focused on achieving financial goals and targets that benefit shareholders. Therefore, 95% of performance shares that are based on financial goals should not be funded by ratepayers, as financial goals do not assist in providing safe and reliable service to ratepayers. Therefore, I recommend disallowance of 95% of NFG's claim for performance shares or $909,281 ($957,138 x 95%). This results in a recommended allowance of $520,678 for stock-based compensation, or a reduction of $909,281 ($1,429,959 - $520,678) to the Company's claim for stock-based compensation.

Q. HAS THE COMMISSION RECENTLY ADJUSTED A COMPANY'S CLAIM FOR INCENTIVE COMPENSATION BASED ON THE REMOVAL INCENTIVE COMPENSATION RELATED TO FINANCIAL GOALS?

A. Yes. In the most recent Columbia Gas base rate case proceeding, the Commission removed 70% of Columbia Gas' total incentive compensation claim that was related to financial goals finding that it was not necessary in providing safe and reliable service to ratepayers. The Commission stated:

[27] I&E Exhibit No. 1, Schedule 3.

We shall deny Columbia's Exception Nos. 3 and 4. We agree with the ALJs' recommendation to adopt the OCA's proposed downward adjustment of $1,798,165, to the Company's cash-based STI compensation expense claim of $2,568,807. As noted by the ALJs and the OCA, Columbia did not explain why 70% of the incentive compensation expense is necessary to provide adequate service to ratepayers, given that only 30% of this claimed expense is related to operational safety and customer experience. *See* OCA St. 2 at 18-19. Accordingly, we shall adopt the ALJs' recommendation to apply a downward adjustment of $1,798,165, [$2,568,807 x 70% = $1,798,165], to reflect a total allowance for cash-based STI compensation expense of $770,642. [$2,568,807 – $1,798,165 = $770,642].

We also agree with the ALJs and the OCA that Columbia failed to present credible evidence that the totality of its LTI compensation plan is reasonable, given that only 30% of the plan is related to safety, customer care, customer satisfaction, or other benefits to ratepayers. Accordingly, we shall adopt the ALJs' recommendation that only 30% of the Company's LTI compensation expense claim of $754,446, or $226,334, [$754,446 x 30% = $226,334], be allowed for ratemaking purposes, resulting in a downward adjustment of $528,112. [$754,446 – $528,112 = $226,334].[28]

MEMBERSHIP DUES

Q. WHAT IS INCLUDED IN MEMBERSHIP DUES?

A. The Company's claim for membership dues includes payments to industry organizations, civic and community organizations, trades, technical, and professional organizations, and other memberships.[29]

[28] *Pa. PUC v. Columbia Gas of Pennsylvania, Inc*., Docket No. R-2025-3053499 (Order Entered December 9, 2025). *See generally* Disposition of Incentive Compensation, p. 123.

[29] NFG Book II, SDR-RR-30 and NFG Book II, SDR-RR-31.

Q. WHAT IS THE COMPANY'S CLAIM FOR MEMBERSHIP DUES?

A. NFG's claim for membership dues is $234,266.[30]

Q. WHAT IS THE BASIS FOR THE COMPANY'S CLAIM?

A. The Company's claim was based on its HTY amount for membership dues.[31]

Q. DO YOU AGREE WITH THE COMPANY'S CLAIM?

A. No.

Q. WHAT IS YOUR RECOMMENDATION FOR MEMBERSHIP DUES?

A. I recommend an allowance of $212,298 for membership dues, or a reduction of $21,968 ($234,266 - $212,298) to the Company's claim.

Q. WHAT IS THE BASIS FOR YOUR RECOMMENDATION?

A. My recommendation is based on disallowing membership dues for civic and community organizations and other membership dues where the Company has not provided adequate support that the membership is necessary to provide safe and reliable service to the Company's ratepayers.[32] My recommended allowance is based on the exclusion of the following membership dues for ratemaking purposes: Erie Downtown Development Corporation ($12,500), Pennsylvania

[30] NFG Book III, Exhibit ATF-1, Schedule 1.
[31] I&E Exhibit No. 1, Schedule 4.
[32] I&E Exhibit No. 1, Schedule 4, p. 3.

Northwest Development Corp. ($2,813), Edison Electric Institute ($1,842), Common Ground Alliance ($1,250), Erie Club ($1,185), Independent Oil & Gas Association of New York ($693), Pittsburgh Region Clean Cities ($500), Clarion County Economic Development ($500), Shenango Valley Chamber of Commerce of ($500), and Other of ($185). This results in a reduction to the Company's claim by $21,968, or a total recommended allowance of $212,298 ($234,266 - $21,968).

Q. HAS THE COMMISSION RECENTLY ADJUSTED A COMPANY'S CLAIM FOR MEMBERSHIP DUES BASED ON THE REMOVAL MEMBERSHIP DUES RELATED TO CIVIC AND COMMUNITY ORGANIZATIONS?

A. Yes. In the most recent Columbia Gas base rate case proceeding, the Commission removed membership dues that were related to chambers of commerce finding that it did not provide a direct benefit to ratepayers. The Commission stated:

> To the extent that Columbia argues that chamber of commerce fees represent a direct benefit to ratepayers, we find the OCA's argument and the testimony of the OCA's witness, Mr. Mugrace, to be more compelling. Specifically, Mr. Mugrace testified that in reviewing Columbia's breakdown of membership costs, such costs "reflect the business network advocacy groups, fraternal, social service clubs, and chambers of commerce that promote the Company in a particular territory or service area and do not reflect any benefits to customers." Mr. Mugrace further testified that chambers of commerce fees "relate to helping small businesses connect with potential customers and promoting economic power in the communities." Mr. Mugrace continued:
>
> > I note that in 66 Pa. C.S. Section 1316.1, recovery of these types of club dues, "no public utility may charge to its customers as a permissible operating expense for

> ratemaking purposes membership fees, dues or charges to fraternal, social or sports clubs or organization." Ratepayers should not pay for costs that appear to be related to contributions, pledges, sponsorships and donations and in accordance with the statute identified above. These types of costs mainly benefit Columbia as being good corporate citizens, advocacy on policy issues before various agencies and civic related initiatives.
>
> OCA St. 2 at 30-31. We concur with Mr. Mugrace's testimony. Indeed, absent evidence that there is any direct benefit to ratepayers, Columbia should not be permitted to recover costs for membership in such organizations. Accordingly, we shall deny, in part, Columbia's Exception No. 6 to the extent that we shall adopt the ALJs' recommendation that the Company not be permitted to recover chamber of commerce membership costs.[33]

Although the above referenced Commission order specifically addresses only membership dues related to chambers of commerce, the Commission also agreed with the Office of Consumer Advocate's testimony regarding the exclusion of membership dues in rates related to business network advocacy groups, fraternal, social service clubs, and chambers of commerce.

CASH WORKING CAPITAL

Q. WHAT IS A CASH WORKING CAPITAL (CWC) ALLOWANCE FOR RATEMAKING PURPOSES?

A. CWC includes the amount of funds necessary to operate a utility during the interim between the rendition of service, including the payment of related

[33] *Pa. PUC v. Columbia Gas of Pennsylvania, Inc*., Docket No. R-2025-3053499 (Order Entered December 9, 2025). *See generally* Disposition of Company Memberships, pp. 156-158.

expenses, and the utility's receipt of revenue in payment of services rendered.

Q. HOW DOES THE COMPANY CALCULATE ITS CWC CLAIM?

A. NFG calculates its CWC by using a lead/lag study. A lead/lag study measures the differences in time between: (1) the time services are rendered until payment of those services is received; and (2) the time between the point when a utility has incurred an expense and the actual payment of the expense. Stated differently, the lead/lag study measures how many days exist on average between the midpoint of the service period and the date the payment is made.

Q. DO YOU AGREE WITH THE COMPANY'S USE OF THE LEAD/LAG METHOD?

A. Yes.

Q. WHAT IS THE COMPANY'S CWC CLAIM?

A. The Company's claim for CWC is $6,754,827.[34]

Q. WHAT IS THE BASIS FOR THE COMPANY'S CLAIM?

A. NFG's claim is based on an HTY lead/lag study, applying total revenues and total expenses for the FPFTY ending October 31, 2027.

[34] NFG Book V, Exhibit A – FPFTY, Schedule C-4, p. 1, line 5.

Q. DO YOU AGREE WITH THE COMPANY'S CLAIM?

A. No.

Q. WHAT DO YOU RECOMMEND?

A. I recommend an allowance of $6,643,822 or a decrease of $111,005 ($6,754,827 - $6,643,822) to the Company's claim.[35]

Q. WHAT IS THE BASIS FOR YOUR RECOMMENDATION?

A. My recommendation is based on my adjustments to O&M expenses as discussed above and I&E's recommended cost of long-term debt ratio of 45%.[36]

Q. IS YOUR RECOMMENDED CWC ALLOWANCE A FINAL RECOMMENDATION?

A. No. All adjustments to NFG's claims for revenues, expenses, taxes, and rate base must be continually brought together in the Administrative Law Judge's Recommended Decision and again in the Commission's Final Order. This process, known as iteration, effectively prevents the determination of a precise calculation until all adjustments have been made to the Company's claim.

[35] I&E Exhibit No. 1, Schedule 5, p. 1.
[36] I&E Exhibit No. 2, Schedule 1.

Q. WHAT O&M ADJUSTMENTS DID YOU INCORPORATE WHEN DETERMINING A RECOMMENDED CWC ALLOWANCE?

A. All O&M adjustments that are cash-based expense claims should be included when determining the Company's CWC requirement. Therefore, I have included cash-based O&M recommendations when computing the overall recommended CWC allowance.

Q. SUMMARIZE WHERE EACH OF THE RECOMMENDED O&M EXPENSE ADJUSTMENTS ARE REFLECTED IN THE CWC COMPUTATIONS.

A. The Net Labor Expense adjustment of $379,731 is reflected in the Payroll (Net Labor) Lag Days calculation. The following recommended adjustments are reflected in the Other Expenses (less Uncollectibles) Lag Days calculation: rate case expense adjustment of $137,600, payroll taxes adjustment of $22,670, stock-based compensation adjustment of $909,281, and membership dues adjustment of $21,968 as discussed above, producing a total decrease of $1,091,519,[37] which is reflected in I&E Exhibit No. 1, Schedule 5, p. 2.

[37] I&E Exhibit No. 1, Schedule 5, p. 4.

ENERGY EFFICIENCY PILOT PROGRAM

Q. WHAT IS NFG'S PROPOSED ENERGY EFFICIENCY PILOT PROGRAM?

A. NFG is proposing an Energy Efficiency (EE) pilot program to be implemented over five years starting in October 2026.[38] The EE Pilot is modeled after other Pennsylvania natural gas utility Energy Efficiency and Conservation (EE&C) programs.[39] The program would offer equipment replacement rebate incentives for residential customers to encourage the installation of high efficiency space heating appliances such as furnaces and boilers, water heaters (including tankless water heaters), and clothes dryers.[40]

Q. WHY IS NFG PROPOSING AN EE PLAN?

A. Although not statutorily mandated for natural gas distribution companies (NGDCs), the Company voluntarily designed and proposed an EE Plan to encourage customers to install high efficiency natural gas appliances. According to the Company, these appliances are the largest consumers of natural gas in residential buildings as these types of appliances are the largest users of natural gas in residential buildings.[41]

[38] NFG Statement No. 18, p .5, lines 1-2.
[39] NFG Statement No. 18, p. 3, lines 2-7.
[40] NFG Statement No. 18, p. 5, lines 5-15.
[41] NFG Statement No. 18, p. 5, lines 2-8.

The Company opines the implementation of the EE Plan is projected to save 11,251 Mcf of natural gas annually for the first five years.[42] Additionally, the Company projects the EE Plan will save $99,460 annually or $497,300 over the life of the EE Plan.[43]

Q. WHAT IS THE ESTIMATED TOTAL SPENDING FOR THE PROPOSED EE PLAN?

A. NFG projects the EE Plan will cost $3,543,630 over five years based on the breakdown shown below:[44]

Budget Item	**2027**	**2028**	**2029**	**2030**	**2031**
Rebates	$476,726	$476,726	$476,726	$476,726	$476,726
Administration	$100,000	$100,000	$100,000	$100,000	$100,000
Evaluation, Measurement & Verification	$60,000	$60,000	$60,000	$60,000	$60,000
Outreach	$100,000	$85,000	$75,000	$50,000	$50,000
Total	**$736,726**	**$721,726**	**$711,726**	**$686,726**	**$686,726**

Q. HOW DOES NFG PROPOSE TO RECOVER THE EE PLAN COSTS?

A. The Company is proposing to recover the cost of the EE Pilot Program from residential customers, which is the rate class that will directly benefit from the program via Rider D.[45] The proposed initial EE Pilot charge is set at $0.0389/Mcf

[42] NFG Statement No. 18, p. 7, lines 10-13.
[43] NFG Statement No. 18, p. 8, lines 1-5.
[44] NFG Statement No. 18, p. 6, line 2.
[45] NFG Statement No. 18, p. 14.

for the residential customer class calculated by dividing the projected EE costs by the projected residential class usage (Mcf) and rounded to the fourth decimal. The net over or under collection of the EE Pilot charge will be reconciled at the end of the 5-year pilot.[46]

Q. DO YOU OPPOSE NFG'S PROPOSAL TO ESTABLISH AND IMPLEMENT AN EE PLAN IN THIS PROCEEDING?

A. No. However, I am recommending that the Company submit an annual report on the EE Pilot three months after the close of the program year. The annual report would include information from activity from the previous program year and progress towards the Company's goals for the remaining years of the EE Pilot. The information to be included in the annual report would also include, but not be limited to, savings (cost and Mcf), participation (by number of customers and type of rebate), spending, cost-effectiveness, highlights of portfolio and program activity, and updates to program delivery and design. Additionally, the annual report would include the above information broken down for low-income customers as well as the number of referrals made to LIURP and the number of referrals to LIURP that received LIURP services as a result of participating in the EE pilot.

[46] NFG Book VII, Exhibit F, Section 2 – Proposed Tariff, p. 160.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes. However, I reserve the right to supplement my testimony or to revise recommendations if additional issues or facts arise during this proceeding.

Professional and Educational Experience
Christopher Keller

Professional Experience

January 2014 to Present
Fixed Utility Financial Analyst
Pennsylvania Public Utility Commission, Harrisburg, Pennsylvania
Bureau of Investigation & Enforcement

September 2008 to January 2014
Insurance Company Financial Analyst
Pennsylvania Insurance Department, Harrisburg, Pennsylvania
Bureau of Licensing & Financial Analysis

Education and Training

FAI Utility Finance and Accounting for Financial Professionals, Boston, MA
May 21-23, 2014

York College of Pennsylvania, York, Pennsylvania
Master of Business Administration, Finance Concentration, 2008
Bachelor of Science, Accounting, 2006

Testimony Submitted

I have testified and/or submitted testimony in the following proceedings:

- Docket No. R-2025-3057164 – PPL Electric Utilities Corporation (O&M)
- Docket No. R-2025-3053442 – York Water Company – Water (O&M)
- Docket No. R-2025-3053573 – York Water Company – Wastewater (O&M)
- Docket No. R-2025-3054392 – Wellsboro Electric Company (ROR)
- Docket No. R-2025-3054394 – Citizens' Electric Company (ROR)
- Docket No. R-2025-3054938 – UGI Utilities, Inc. – Gas Division (1307(f))
- Docket No. R-2024-3052716 – UGI Utilities, Inc. – Gas Division (O&M)
- Docket No. R-2024-3052357 – Pike County Light & Power Company (Gas) (ROR)
- Docket No. A-2022-3033138 – Aqua Pennsylvania Wastewater, Inc. – Acquisition of the Wastewater System Assets of the City of Beaver Falls (1329)
- Docket No. P-2024-3051313 – Rock Spring Water Company (529 Investigation)
- Docket No. R-2024-3047822 – Aqua Pennsylvania, Inc. (ROR)
- Docket No. R-2024-3047824 – Aqua Pennsylvania Wastewater, Inc. (ROR)
- Docket No. M-2023-3042180 – Venango Water Company, Sugarcreek Water Company, West Hickory Water Company, Plumer Water Company, Fryburg Water Company, Cooperstown Water Company, and Blaine E. Rhodes Sewer Company (529 Investigation)
- Docket No. R-2024-3048828 – UGI Utilities, Inc. – Gas Division (1307(f))

Professional and Educational Experience
Christopher Keller

Testimony Submitted (Continued)

I have testified and/or submitted testimony in the following proceedings:

- Docket No. R-2024-3046932 – PECO Energy Company – Gas Division (O&M)
- Docket No. R-2024-3046523 – Duquesne Light Company (ROR)
- Docket No. R-2023-3044549 – Peoples Natural Gas Company LLC (O&M)
- Docket No. R-2023-3040258 – Columbia Water Company (O&M and ROR)
- Docket No. R-2023-3040290 – UGI Utilities, Inc. – Gas Division (1307(f))
- Docket No. R-2022-3037368 – UGI Utilities, Inc. – Electric Division (O&M)
- Docket No. R-2022-3035730 – National Fuel Gas Distribution Corporation (O&M)
- Docket No. R-2022-3031340 – York Water Company – Water (ROR)
- Docket No. R-2022-3032806 – York Water Company – Wastewater (ROR)
- Docket No. R-2022-3032300 – Valley Energy, Inc. (ROR)
- Docket No. R-2022-3031704 – Borough of Ambler – Water Department (ROR)
- Docket No. R-2022-3032242 – UGI Utilities, Inc. – Gas Division (1307(f))
- Docket No. R-2022-3031211 – Columbia Gas of Pennsylvania, Inc. (ROR)
- Docket No. A-2021-3026132 – Aqua Pennsylvania Wastewater, Inc. – Acquisition of the Wastewater Collection and Conveyance System Assets of East Whiteland Township (1329)
- Docket No. P-2021-3030012 – Metropolitan Edison Company (DSP)
- Docket No. P-2021-3030013 – Pennsylvania Electric Company (DSP)
- Docket No. P-2021-3030014 – Pennsylvania Power Company (DSP)
- Docket No. R-2024-3046932 – PECO Energy Company – Gas Division (ROR)
- Docket No. P-2021-3030021 – West Penn Power Company (DSP)
- Docket No. R-2021-3026116 – Borough of Hanover – Water (ROR)
- Docket No. R-2021-3025206 – Community Utilities of Pennsylvania – Water Division (ROR)
- Docket No. R-2021-3025207 – Community Utilities of Pennsylvania – Wastewater Division (ROR)
- Docket No. R-2021-3025652 – UGI Utilities, Inc. – Gas Division (1307(f))
- Docket No. R-2021-3024750 – Duquesne Light Company (O&M and ROR)
- Docket No. R-2021-3024296 – Columbia Gas of Pennsylvania, Inc. (ROR)
- Docket No. R-2020-3018929 – PECO Energy Company – Gas Division (ROR)
- Docket No. P-2020-3020914 – Twin Lakes Utilities, Inc. (529 Proceeding)
- Docket No. R-2020-3018835 – Columbia Gas of Pennsylvania, Inc. (ROR)
- Docket No. R-2020-3019680 – UGI Utilities, Inc. (1307(f))
- Docket No. P-2020-3019356 – PPL Electric Utilities Corporation (DSP)
- Docket No. R-2019-3015162 – UGI Utilities, Inc. – Gas Division (ROR)
- Docket No. R-2019-3010955 – City of Lancaster – Sewer Fund (O&M)
- Docket No. R-2019-3009647 – UGI Utilities, Inc. – Gas Division (1307(f))
- Docket No. R-2018-3006818 – Peoples Natural Gas Company LLC (O&M)

Professional and Educational Experience
Christopher Keller

Testimony Submitted (Continued)

I have testified and/or submitted testimony in the following proceedings:

- Docket No. R-2018-3000124 – Duquesne Light Company (O&M)
- Docket No. R-2018-3001631 – UGI Central Penn Gas, Inc. (1307(f))
- Docket No. R-2018-3001632 – UGI Penn Natural Gas, Inc. (1307(f))
- Docket No. R-2018-3001633 – UGI Utilities, Inc. (1307(f))
- Docket No. R-2018-2645938 – Philadelphia Gas Works (1307(f))
- Docket No. P-2017-2637855 – Metropolitan Edison Company (DSP)
- Docket No. P-2017-2637857 – Pennsylvania Electric Company (DSP)
- Docket No. P-2017-2637858 – Pennsylvania Power Company (DSP)
- Docket No. P-2017-2637866 – West Penn Power Company (DSP)
- Docket No. R-2017-2602627 – UGI Central Penn Gas, Inc. (1307(f))
- Docket No. R-2017-2602638 – UGI Utilities, Inc. (1307(f))
- Docket No. R-2017-2586783 – Philadelphia Gas Works (O&M)
- Docket No. R-2017-2587526 – Philadelphia Gas Works (1307(f))
- Docket No. I-2016-2526085 – Delaware Sewer Company (529 Proceeding)
- Docket No. R-2016-2531550 – Citizens' Electric Company (O&M)
- Docket No. R-2016-2531551 – Wellsboro Electric Company (O&M)
- Docket No. R-2016-2537349 – Metropolitan Edison Company (CWC and CAP)
- Docket No. R-2016-2537352 – Pennsylvania Electric Company (CWC and CAP)
- Docket No. R-2016-2537355 – Pennsylvania Power Company (CWC and CAP)
- Docket No. R-2016-2537359 – West Penn Power Company (CWC and CAP)
- Docket No. R-2016-2543311 – UGI Central Penn Gas, Inc. (1307(f))
- Docket No. R-2015-2518438 – UGI Utilities, Inc. – Gas Division (CWC and USP)
- Docket No. P-2015-2511333 – Metropolitan Edison Company (DSP)
- Docket No. P-2015-2511351 – Pennsylvania Electric Company (DSP)
- Docket No. P-2015-2511355 – Pennsylvania Power Company (DSP)
- Docket No. P-2015-2511356 – West Penn Power Company (DSP)
- Docket No. R-2015-2468056 – Columbia Gas of Pennsylvania, Inc. (O&M)
- Docket No. P-2014-2404341 – Delaware Sewer Company (529 Investigation)
- Docket No. R-2014-2452705 – Delaware Sewer Company (O&M)
- Docket No. R-2014-2428304 – Borough of Hanover – Water (O&M)
- Docket No. R-2014-2419774 – Wellsboro Electric Company (Customer Choice Support Charge)
- Docket No. R-2014-2420279 – UGI Central Penn Gas, Inc. (1307(f))

Assisted with the Following Cases

- Docket No. R-2017-2631441 – Reynolds Water Company (ROR)
- Docket No. R-2016-2580030 – UGI Penn Natural Gas, Inc. (ROR)

Assisted with the Following Cases (Continued)

- Docket No. R-2014-2462723 – United Water Pennsylvania (CWC)
- Docket No. R-2014-2428742 – West Penn Power Company (CWC)
- Docket No. R-2014-2428743 – Pennsylvania Electric Company (CWC)
- Docket No. R-2014-2428744 – Pennsylvania Power Company (CWC)
- Docket No. R-2014-2428745 – Metropolitan Edison Company (CWC)
- Docket No. R-2013-2397353 – Pike County Light & Power Company (Gas) (O&M)
- Docket No. R-2013-2397237 – Pike County Light & Power Company (Electric) (O&M)

I&E Exhibit No. 1
Witness: Christopher Keller
NON-PROPRIETARY

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

Docket No. R-2025-3059428

Exhibit to Accompany

the

Direct Testimony

of

Christopher Keller

Bureau of Investigation and Enforcement

Concerning:

Operating and Maintenance Expenses
Taxes Other Than Income
Cash Working Capital
Energy Efficiency Pilot Program

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

I&E Exhibit No. 1
Schedule 2
Page 1 of 5

Question

Reference NFG Book III, NFG Statement No. 4, pp. 13-17, NFG Book III, NFG Exhibit MPW-1, pp. 13-16, and NFG Book III, NFG Exhibit ATF-1, Schedule 1 concerning incentive compensation: A. Provide a copy of all Company profit sharing, incentive compensation, and bonus pay plans. B. Include each plan's criteria for participant eligibility and each plan's established criteria/goals that are to be met for payout. 4 C. Provide a copy of the analysis provided by Korn Ferry Group. D. Identify the amounts expensed and the amounts capitalized by year for HTY 2025, 2026 YTD beginning October 1, 2025, FTY 2026 claim, and FPFTY 2027 claim for each type of compensation broken down by salaried, affiliated labor, hourly union, hourly non-union, and temporary. E. Breakdown of incentive compensation by financial results, safety results, and qualitative results by year for: HTY 2025, 2026 YTD beginning October 1, 2025, 2026 FTY claim, and FPFTY 2027 claim for each type of compensation and broken down by salaried, affiliated labor, hourly union, hourly nonunion, and temporary. F. For Parts D and E, if incentive compensation is not directly incurred by the Company, provide a detailed explanation and supporting documentation, including but not limited to, calculations used to determine incentive compensation allocated to the Company for all time periods above.

Response

A. Please refer to responses provided for Standard Data Request-Revenue Requirement Question No. RR-27 for officer bonus and equity plans (stock-based compensation), and National Fuel Exhibit VLH-1 for the Annual Cash Bonus Program (which is available to supervisors).
B. For the Annual Cash Bonus Program see National Fuel Exhibit VLH-1. For the AARCIP/EACIP officer short-term incentive cash bonus program goals/achievement please see attached CONFIDENTIAL Attachments I&E-RE-D-10 B a) and I&E-RE-D-10 B b). For stock-based compensation (otherwise known as long-term incentive compensation (LTI)), refer to RR-27 for the 2010 Equity Compensation Plan. LTI is expensed from the date of grant through the performance period, taking into account retirements and ultimately are vested at the end of the performance period. LTI is comprised of performance shares (based on National Fuel Gas Company achievement) and restricted stock (which

are time-vested). Performance shares for Relative Total Shareholder Return are based on the average closing stock price for the prior calendar month with reinvested dividends, relative to other companies that are part of National Fuel Gas Company's peer group. Performance shares for Relative Total Return on Capital are based on the average of the returns on capital for each twelve-month period corresponding to National Fuel Gas Company's fiscal years during the performance cycle, relative to its peer group. Performance shares for Methane Intensity and Greenhouse Gas Emissions are based on targeted rates of intensity of Scope 1 methane emissions and Scope 1 greenhouse gas emissions. Please see CONFIDENTIAL Attachments I&E-RE- D-10-B c), I&E-RE-D-10-B d), and I&E-RE-D-10-B e), for the achievement related to the most recent vested performance cycles. Certain information is redacted in these attachments where the Company is not seeking recovery for these amounts and/or to exclude individual names where a corresponding title is provided. Copies of the CONFIDENTIAL Attachments referenced in this response will only be provided to parties pursuant to the terms of a Stipulated Protective Agreement or Protective Order entered in this proceeding. Restricted Stock Units are time vested for both Officers and Non-officers and are not tied to goal achievements.

C. Please see attached PUBLIC REDACTED VERSION of the Korn Ferry Report (CONFIDENTIAL Attachment I&E-RE-D-10 C). Certain information is redacted in this attachment where the Company is not seeking recovery for these amounts and/or to exclude individual names where a corresponding title is provided. Copies of the CONFIDENTIAL Attachment I&E-RE-D-10 C will only be provided to parties pursuant to the terms of a Stipulated Protective Agreement or Protective Order entered in this proceeding.

D. The Annual Cash Bonus breakdowns are provided in the attached (Attachment I&E-RE-D-10-D&F). [BEGIN CONFIDENTIAL] The Company's officer bonus expense accrued for HTY 2025 was $919,188, while in the first quarter FTY 2026 $329,020 was accrued for officer bonus expense. Included in this accrual is NFG Other Bonus compensation related to HTY 2025 ($137,500) and one quarter of the projected FTY 2026 expense ($191,520). There is no capitalized rate recovery request related to such bonuses. The Company's officer LTI expense for HTY 2025 was $1,073,366 ($752,785 for performance shares and $320,581 for restricted stock) while non-officer restricted stock was $233,280 (note: there is no capitalized rate recovery requirement related to stock-based compensation).

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
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For Q1 FTY 2026, the Company's officer LTI expense was $244,078 ($148,804 for performance shares and $95,274 for restricted stock). [END CONFIDENTIAL]

E. The Annual Cash Bonus Program amounts paid during the HTY 2025 were paid out at 91% of target (customer service satisfaction and system reliability 24%; operational safety and methane emissions reduction 25%; employee safety 17%; and diversity and inclusion 25%) The Annual Cash Bonus Program amounts paid during the HTY 2026 were paid out at 115% of target (customer service, satisfaction, and system reliability 23%; operational safety and methane emissions reductions 25%; employee safety 25%; diversity and inclusion 25%, and discretionary 17%). Please see CONFIDENTIAL Attachments I&E RE-D-10-B a) and b) for the goal achievement/criteria related to the most recent AARCIP and EACIP payouts and note that these will only be provided to parties pursuant to the terms of a Stipulated Protective Agreement or Protective Order entered in this proceeding.

F. For the breakdown of the Annual Cash Bonus Program amounts charged by affiliates please see attached (Attachment I&E-RE-D-10-D and F). For allocation of officer compensation from affiliates please see attached (Attachment I&E-RE-D-10 F a) and Attachment I&E-RE-D-10 F b)).

I&E Exhibit No. 1
Schedule 4
Page 1 of 3

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
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Question

Reference NFG Book II, SDR-RR-30 and SDR-RR-31 and NFG Book III, NFG Exhibit ATF-1, Schedule 1 concerning membership dues. Provide the following: 9 A. Similar breakdown to NFG Book II, SDR-RR-30 for TME September 30, 2023, September 30, 2024, HTY 2025, FTY 2026 claim, and FPFTY 2027 claim. B. Explanation for any increases by fiscal year from the HTY to the FPFTY claim. C. Explanation of the specific benefit to distribution ratepayers for each membership listed in NFG Book II, SDR-RR-30. D. Identify any portions of memberships attributable to lobbying not specifically identified in NFG Book II, SDR-RR-30. E. Detailed explanation and reconciliation for the difference in membership dues in NFG Book II, SDR-RR-30 of $245,477 and NFG Book III, NFG Exhibit ATF-1, Schedule 1 of $234,266.

Response

A. Please see attached file (I&E-RE-D-22.xlsx). The HTY expense amounts in this summary exclude all lobbying costs and were used as the basis for the FTY and FPFTY expense.

B. There are no increases from the HTY to the FPFTY claim.

C. The benefits of each membership are outlined in NFG Book II, SDR-RR-31.

D. The HTY expense amount included in attachment I&E-RE-D-22.xlsx excludes all lobbying costs. As the HTY was held constant for the FTY and FPFTY, no lobbying costs are included in the Company's filing.

E. The difference in membership dues between NFG Book II, SDR-RR-30 and NFG Exhibit ATF-1, Schedule 1 of $11,211 is attributable to 2 components. NFG Book II, SDR-RR-30 excluded credits related to corrections of previously charged expenses totaling $5,446. Additionally, the amount of membership dues in NFG Book II, SDR-RR-30 included all expenses charged to non-lobbying accounts, including the pre-paid account for the American Gas Association dues. A portion of this account is reclassed to a lobbying account each month, while the remainder is charged to an O&M expense account. This accounted for the remaining difference of $5,765 between NFG Book II, SDR-RR-30 and NFG Exhibit ATF-1, Schedule 1. The amount

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
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shown on NFG Exhibit ATF-1, Schedule1 was used as the basis for the revenue requirement.

PAD O&M - Dues and Memberships

Description	TME 9/30/23	TME 9/30/24	TME 9/30/25	FTY	FPFTY
AMERICAN GAS ASSOCIATION	$126,259	$131,042	$142,030		
ENERGY ASSOCIATION OF PENNSYLVANIA	50,718	54,043	58,514		
ERIE REGIONAL CHAMBER & GROWTH	15,450	13,750	-		
ERIE DOWNTOWN DEVELOPMENT CORPORATION	25,000	12,500	12,500		
COALITION FOR RENEWABLE	6,000	6,000	6,000		
OUR NATIONS ENERGY FUTURE	2,333	3,500	3,700		
PENN-NORTHWEST DEVELOPMENT CORP	2,813	2,813	2,813		
EDISON ELECTRIC INSTITUTE	1,773	973	1,842		
COMMON GROUND ALLIANCE	1,250	1,250	1,250		
ERIE CLUB	1,104	1,673	1,185		
INSTITUTE OF INTERNAL AUDITORS	851	716	792		
IOGA OF NEW YORK	578	693	693		
MANUFACTURER & BUSINESS ASSOCIATION	663	642	693		
ERIE COUNTY BAR ASSOCIATION	560	560	570		
PITTSBURGH REGION CLEAN CITIES	500	500	500		
CLARION COUNTY ECONOMIC DEVELOPMENT	500	500	500		
SHENANGO VALLEY CHAMBER OF COMMERCE	500	450	500		
OTHER	13,057	9,376	185		
Total Dues and Memberships	$249,908	$240,981	$234,266	$234,266	$234,266
% Increase/(Decrease)		-4%	-3%	0%	0%

Note: FYTD Jan 2026 = October 2025 - January 2026

I&E Exhibit No. 1
Schedule 4
Page 3 of 3

-- I&E Modified --

Schedule: C-4
Witness: M. M. Duszenko
Page: 1 of 5

I&E Exhibit No. 1
Schedule 5
Page 1 of 4

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

Working Capital

Line No	Description	[1] Fully Projected Future Test Year October 31, 2027		[2] Reference
1	Working Capital for O&M Expenses	$ 7,139	(a)	C-4, Page 2
2	Interest Payments	(1,734)	(b)	C-4, Page 3
3	Tax Payment Lag Calculations	158		C-4, Page 4
4	Prepaid Expenses	1,080		C-4, Page 5
5	Total Working Capital Requirements	$ 6,644		

(a) Ref: I&E Exhibit No. 1, Schedule 5, p. 2.
(b) Ref: I&E Exhibit No. 1, Schedule 5, p. 3.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

I&E Exhibit No. 1
Schedule 5
Page 2 of 4

Summary of Working Capital

Line #	Description	[1] Reference	[2] Test Year Expenses	[3] Lead/Lag Days	[4] Weighted Average [2] * [3]	[5] Totals
WORKING CAPITAL REQUIREMENT						
1	REVENUE LAG DAYS	C-4, Page 3-5, HTY				47.16
2	EXPENSE LAG DAYS					
3	Purchased Gas Costs	Schedule A-1	$ 124,571	39.83	$ 4,961,646	
4	Other Expenses (less Uncollectibles)	Exhibit No. ATF-1 Schedule 1	34,657 (a)	41.01	1,421,271	
5	Payroll (Net Labor)	Exhibit No. ATF-1 Schedule 1	40,212 (b)	10.32	414,991	
6	Total	Sum (L 3 to L 5)	$ 199,440		$ 6,797,909	
7	O & M Expense Lag Days	L6, Col. 4 / Col. 2				34.09
8	Net (Lead) Lag Days	Line 1 - Line 7				13.07
9	Operating Expenses Per Day	Line 6, Col. 2 / 365				$ 546
10	Working Capital for O & M Expense	Line 8 * Line 9				$ 7,139
11	Interest Payments	Page 3				(1,734)
12	Tax Payment Lag Calculations	Page 4				158
13	Prepaid Expenses	Page 5				1,080
14	Total Working Capital Requirement	Sum (Line 10 to Line 13)				$ 6,644

(a) I&E Exhibit No. 1, Schedule 5, p. 4.
(b) I&E Statement No. 1, p. 2.

-- I&E Modified --

Schedule: C-4
Witness: M. M. Duszenko
Page: 3 of 5

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

I&E Exhibit No. 1
Schedule 5
Page 3 of 4

Interest Payments

Line No.	Description	[1] Reference Or Factor	[2] # of Days	[3] # of Days	[4] Total
1	Rate Base of October 31, 2027	Sch C-1			$ 571,582
2	Long-term Debt Ratio	Sch B-7			45.00% (a)
3	Embedded Cost of Long-term Debt	Sch B-7			5.58%
4	Pro forma Interest Expense	L 1 * L 2 * L 3			$ 14,352
5	Daily Amount	L 4 / L 5 [Col 2]	365		$ 39
6	Days to mid-point of interest payments			91.25	
7	Less: Revenue Lag Days	Page 2		47.16	
8	Interest Payment lag days	L 7 - L 6			(44.1)
9	Total Interest for Working Capital	L 5 * L 8			$ (1,734)

(a) Ref: I&E Exhibit No. 2, Schedule 1.

National Fuel Gas Distribution Corporation
Cash Working Capital Other Expense (less Uncollectibles) Adjustment
For the Twelve Months Ended October 31, 2027

		I&E Recommended Adjustment
1	Rate Case Expense	(137,600)
2	Payroll Taxes	(22,670)
3	Stock Based Compensation	(909,281)
4	Membership Dues	(21,968)
5	Total	(1,091,519)

Ref: I&E Statement No. 1, p. 2.

I&E Statement No. 1-R
Witness: Christopher Keller

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

Docket No. R-2025-3059428

Rebuttal Testimony

of

Christopher Keller

Bureau of Investigation & Enforcement

Concerning:

Low-Income Usage Reduction Program

TABLE OF CONTENTS

INTRODUCTION 1

RESPONSE TO PWPTF WITNESS JENNIFER WARABAK..... 2

INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Christopher Keller. My business address is Pennsylvania Public Utility Commission, Commonwealth Keystone Building, 400 North Street, Harrisburg, PA 17120.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by the Pennsylvania Public Utility Commission (Commission) in the Bureau of Investigation & Enforcement (I&E) as a Fixed Utility Financial Analyst.

Q. ARE YOU THE SAME CHRISTOPHER KELLER WHO SUBMITTED THE DIRECT TESTIMONY CONTAINED IN I&E STATEMENT NO. 1 AND I&E EXHIBIT NO. 1?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my rebuttal testimony is to respond to the direct testimony of the Pennsylvania Weatherization Providers Task Force (PWPTF) witness Jennifer Warabak concerning her recommended increase to NFG's Low-Income Usage Reduction Program (LIURP) budget.[1]

[1] PWPTF Statement No. 1.

Q. DOES YOUR REBUTTAL TESTIMONY INCLUDE AN EXHIBIT?

A. Yes. I&E Exhibit No. 1-R contains a schedule that supports my rebuttal testimony.

RESPONSE TO PWPTF WITNESS JENNIFER WARABAK

Q. SUMMARIZE MS. WARABAK'S RECOMMEDNATION REGARDING NFG'S LIURP BUDGET.

A. Ms. Warabak recommends that the Company increase its LIURP budget by the percentage increase in rates for residential customers as a result of this proceeding. Ms. Warabak states that due to the likelihood of an increase in rates as a result of this proceeding that an increase in LIURP funding would help low-income customers deal with the increase in rates and help low-income customers conserve energy.[2]

Q. DO YOU AGREE WITH MS. WARABAK'S RECOMMENDATION?

A. No. While Ms. Warabak's recommendation is well-intentioned, it is inappropriate to consider an increase in the LIURP budget in the instant proceeding. As mentioned by Ms. Warabak, the Company has been unable to exhaust its existing budget in 2022, 2023, and 2024 with the Company having underspent its budget by almost $1,500,000 in 2025.[3] Additionally, Ms. Warabak has not shown that

[2] PWPTF Statement No. 1, pp. 5-7.
[3] I&E Exhibit No. 1-R, Schedule 1.

NFG would utilize the increased budgeted funds. Finally, Ms. Warabak does not provide adequate support for how NFG would complete the additional jobs and exhaust its existing LIURP budgeted funds. Ms. Warabak's argument is too speculative and not supported by any data or other evidence.

Q. DO YOU HAVE ANY ADDITIONAL COMMENTS REGARDING YOUR RECOMMENDATION TO DENY AN INCREASE IN LIURP FUNDING IN THIS PROCEEDING?

A. Yes. While my response to Ms. Warabak's recommendation explained above specifically relates to Ms. Warabak's failure to provide support for NFG's ability to utilize the additional funding, it is important to note that these LIURP program costs are directly funded by ratepayers who do not receive assistance from low-income programs. It is unreasonable to implement an increase to LIURP paid for by ratepayers, when the Company's ability to utilize these additional funds is not supported by past experience and is uncertain.

Q. DO YOU HAVE ANY FINAL COMMENTS ABOUT MS. WARABAK'S DIRECT TESTIMONY?

A. Yes. Due to the length, depth, and number of issues addressed in Ms. Warabak's direct testimony and the direct testimony of other parties, my lack of response to any topic or recommendation should not be interpreted as agreement with those recommendations.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes. However, I reserve the right to supplement my testimony or to revise recommendations if additional issues or facts arise during this proceeding.

I&E Exhibit No. 1-R
Witness: Christopher Keller

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

Docket No. R-2025-3059428

Exhibit to Accompany

the

Rebuttal Testimony

of

Christopher Keller

Bureau of Investigation and Enforcement

Concerning:

Hardship Fund
Low-Income Usage Reduction Program

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please indicate for each year from January 2022 to date disaggregated by year, as of the last day of the year, whether: a) NFG exhausted its LIURP budget; b) If such budget was not exhausted, the number of dollars not spent; c) If such budget was exhausted, the number of NFG customers who did not receive LIURP services despite having been found to be LIURP eligible. Please provide this data in a live Excel spreadsheet.

Response

See Attachment Cause-PA-II-10. Note that the Company does not have the information in section (c) as this information is not tracked.

Section A

Year	NFG exhausted its LIURP budget
2022	No
2023	No
2024	No
2025	No
2026	N/A

Section B

Year	If such budget was not exhausted, the number of dollars not spent
2022	$2,088,596.46
2023	$2,367,861.62
2024	$2,311,157.99
2025	$1,450,879.24
2026	N/A

Section C

Year	If such budget was exhausted, the number of NFG customers who did not receive LIURP services despite having been found to be LIURP eligible
2022	N/A
2023	N/A
2024	N/A
2025	N/A
2026	N/A

I&E Statement No. 1-SR
Witness: Christopher Keller

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

Docket No. R-2025-3059428

Surrebuttal Testimony

of

Christopher Keller

Bureau of Investigation & Enforcement

Concerning:

Operating and Maintenance Expenses
Taxes Other Than Income
Cash Working Capital
Energy Efficiency Pilot Program

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INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Christopher Keller. My business address is Pennsylvania Public Utility Commission, Commonwealth Keystone Building, 400 North Street, Harrisburg, PA 17120.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by the Pennsylvania Public Utility Commission (Commission) in the Bureau of Investigation & Enforcement (I&E) as a Fixed Utility Financial Analyst.

Q. ARE YOU THE SAME CHRISTOPHER KELLER WHO SUBMITTED THE DIRECT TESTIMONY CONTAINED IN I&E STATEMENT NO. 1 AND I&E EXHIBIT NO. 1?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. The purpose of my surrebuttal testimony is to respond to the rebuttal testimony of National Fuel Gas Distribution Company (NFG or Company) witnesses Anthony T. Formato,[1] Michael P. Weidner,[2] Monika M. Duszenko,[3] and Erik M. Solomon.[4]

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[1] NFG Statement No. 3-R.
[2] NFG Statement No. 5-R.
[3] NFG Statement No. 6-R.
[4] NFG Statement No. 18-R.

Q. DOES YOUR SURREBUTTAL TESTIMONY INCLUDE AN EXHIBIT?

A. Yes. I&E Exhibit No. 1-SR contains a schedule that supports my surrebuttal testimony. In this surrebuttal testimony, I will also make references to my direct testimony[5] and its accompanying exhibit.[6]

SUMMARY OF I&E'S OVERALL UPDATED POSITION

Q. PLEASE SUMMARIZE THE COMPANY'S UPDATED OVERALL CLAIMED REVENUE REQUIREMENT.

A. In rebuttal testimony, the Company updated its requested increase presenting an increase of $18,475,000 to present rate revenues of $265,524,000, resulting in a total overall revenue requirement of $283,999,000.[7]

Q. PLEASE SUMMARIZE YOUR ADJUSTMENTS AS CONTAINED IN THIS SURREBUTTAL TESTIMONY.

A. The following table summarizes my recommended adjustments to NFG's updated position.

[5] I&E Statement No. 1.
[6] I&E Exhibit No. 1.
[7] NFG Exhibit A – FPFTY Rebuttal Update, Schedule A-1.

	Company Claim	I&E Adjustment	I&E Recommended Allowance
O&M Expenses:			
Rate Case Expense	$344,000	($137,600)	$206,400
Net Labor Expense	$40,592,056	($379,731)	$40,212,325
Payroll Taxes	$2,399,564	($22,670)	$2,376,894
Stock-Based Compensation	$1,429,959	($909,281)	$520,678
Membership Dues	$234,266	($21,968)	$212,298
Total O&M Expense Adjustments		($1,471,250)	
Rate Base Adjustments:			
Cash Working Capital	$6,715,156	($110,624)	$6,604,532
Total Rate Base Adjustments		($110,624)	

Q. WHAT IS I&E'S TOTAL UPDATED RECOMMENDED REVENUE REQUIREMENT?

A. I&E's updated total recommended revenue requirement for the Company is $276,603,000. This recommended revenue requirement represents an increase of $11,079,000 to the Company's updated claimed present rate revenues of $265,524,000. This total recommended increase incorporates adjustments made in this testimony and those made in the surrebuttal testimony of Drew Breuning.[8]

[8] I&E Statement No. 2-SR.

The following table summarizes the I&E surrebuttal position:

National Fuel Gas Distribution Company		TABLE I			
R-2025-3059428		INCOME SUMMARY			
($ In Thousands)					
	10/31/27	INVESTIGATION & ENFORCEMENT			
	Proforma	[----------			----------]
	Present Rates	Adjustments	Present Rates	Allowances	Proposed
	$	$	$	$	$
Operating Revenue	265,524	0	265,524	11,079	276,603
Deductions:					
O&M Expenses	204,048	-1,472	202,576	172	202,748
Depreciation	25,302	0	25,302		25,302
Taxes, Other	2,489	0	2,489	0	2,489
Income Taxes:					
Current State	0	76	76	817	893
Current Federal	-1,716	198	-1,518	2,119	601
Deferred Taxes	-623	0	-623		-623
ITC	0	0	0		0
Total Deductions	229,500	-1,198	228,302	3,108	231,410
Income Available	36,024	1,198	37,222	7,971	45,193
Rate Base	571,456	-110	571,346	0	571,346
Rate of Return	6.30%		6.51%		7.91%

RATE CASE EXPENSE

Q. SUMMARIZE YOUR RECOMMENDATION IN DIRECT TESTIMONY FOR RATE CASE EXPENSE.

A. In direct testimony, I recommended rate case expense be normalized over a period of 5 years or 60 months resulting in an annual expense of $206,400 [($1,032,000 ÷ 60 months) x 12 months], or a reduction of $137,600 ($344,000 - $206,400) to the Company's claim. I disagreed with the Company's claimed three-year normalization period because it was not supported by the Company's historic filing frequency, was speculative in nature, and noting the Commission has agreed

with I&E that the normalization period be based on actual historic filing frequency rather than future speculation.[9]

Using the Company's last three base rate case filing dates and the date of the current filing, an average interval was computed to be 85 months ((39 mo. + 197 mo. + 20 mo.) ÷ 3 intervals). The Company's requested 36-month recovery period was not supported by its historic filing record. In contrast, my recommended five years (60 months) normalization period was a reasonable interval to utilize in consideration of NFG's historic filing record. Although the 60-month normalization period was shorter than the Company's actual 85-month filing frequency, my recommendation was in the public interest as it was more realistic than NFG's proposed 36-month period and it moderated the impact of the rate case filing interval of 197 months used in calculating the Company's average historical filing frequency. Thus, I recommended that the claimed three-year recovery period be rejected as it would result in an unreasonable and unsupported increase in rates.

Q. DID THE COMPANY RESPOND TO YOUR RECOMMENDATION FOR RATE CASE EXPENSE?

A. Yes. Company witness Anthony T. Formato disagrees with my recommendation that rate case expense be normalized over a five-year or 60-month period.

[9] I&E Statement No. 1, pp. 4-10.

Q. PLEASE SUMMARIZE MR. FORMATO'S RESPONSE.

A. Mr. Formato asserts two of the rate cases used in my calculation are from more than twenty years ago and do not reflect the current business environment. Mr. Formato refers to the direct testimony of Rebecca E. Hillery[10] that the Company's current filing was due to continued inflationary pressures along with accelerated infrastructure replacement and system modernization capital investments where the Company will need to invest approximately $123.9 million in additional gas distribution plant in 2026 and 2027. Mr. Formato states that the average modernization related capital expenditures were $23.8 million from 2017 to 2021 and therefore, the interval between the 2006 base rate case and the 2022 base rate case of 16 years should not carry as much weight as the most recent interval of the base rate case in 2022 and this current proceeding. Finally, Mr. Formato states that the three-year interval is more indicative of the Company's current operating model and its investment plan and should be the basis of the Company's recovery for rate case expense.[11]

[10] NFG Statement No. 1.
[11] NFG Statement No. 3-R, pp. 9-10.

Q. DO YOU AGREE WITH MR. FORMATO'S RESPONSE THAT THE THREE-YEAR NORMALIZATION BASED ON THE COMPANY'S ACCELERATED INFRASTRUCTURE REPLACEMENT AND SYSTEM MODERNIZATION CAPITAL INVESTMENTS AND EXPECTED AND INCREASES IN O&M EXPENSES IS SUFFICIENT?

A. No. As stated in my direct testimony, the Commission has cited the importance of considering the involved utility's history regarding the frequency of rate case filings as an essential element in determining the normalized level of rate case expense for ratemaking purposes.[12] While the Commission allows utilities to normalize this expense, it is not appropriate to do so over a time period that is based on mere speculation of future filings or a simple statement that the Company plans to file another rate case within three years based on accelerated infrastructure replacement and system modernization capital investments and increases in O&M expenses.

Further, as noted above, my recommendation moderated the impact of the rate case filing interval of 197 months used in calculating the Company's average historical filing frequency. This should mitigate Mr. Formato's concern that the interval between the 2006 base rate case and the 2022 base rate case of 16 years should not carry as much weight as the most recent interval

[12] I&E Statement No. 1, p. 5.

Additionally, as stated in my direct testimony, the 2012 PPL Electric Utilities Corporation (PPL) base rate case[13] actually demonstrates that the use of historic filing frequency is more reliable as PPL was granted a 24-month normalization period, but it did not file its next base rate case until March 31, 2015[14] which was 36 months after the 2012 base rate case proceeding. In contrast, I&E's recommendation of 32-months based on historic filing frequency was more accurate.[15]

Q. DOES USING A HISTORIC FILING FREQUENCY CAPTURE CHANGES TO A COMPANY'S RATE CASE FILING INTERVAL?

A. Yes. Through the filing of more frequent or less frequent rate cases, a company's normalization period will naturally align with the current trend in filing history. Since changes in filing frequency are reflected in the historic normalization period, it is unnecessary to base a rate case expense claim on speculation as to when the next filing will occur. Additionally, I referenced seven cases in my direct testimony that support this methodology in determining a company's historic filing frequency.[16]

[13] *PA PUC v. PPL Electric Utilities Corporation*, Docket No. R-2012-2290597, pp. 47-48 (Order Entered December 28, 2012).
[14] *PA PUC v. PPL Electric Utilities Corporation*, Docket No. R-2015-2469275, p. 3 (Order Entered November 19, 2015).
[15] I&E Statement No. 1, p. 8.
[16] I&E Statement No. 1, pp. 9-10.

Q. DO YOU HAVE ANY CHANGES TO YOUR RECOMMENDATION FOR RATE CASE EXPENSE?

A. No. I continue to recommend an allowance of $206,400 for rate case expense based on a five-year or 60-month normalization period as the Company's historic filing frequency does not support the claimed three-year normalization period.

NET LABOR EXPENSE

Q. SUMMARIZE YOUR RECOMMENDATION IN DIRECT TESTIMONY FOR NET LABOR EXPENSE.

A. In direct testimony, I recommended an allowance of $40,212,325 for net labor expense, or a reduction of $379,731 ($40,592,056 - $40,212,325) to NFG's claim. My recommendation was based on the removal of the portion of the executive bonus that is attributable to achieving financial goals which serve to primarily benefit shareholders and should not be funded by ratepayers as financial goals do not assist in providing safe and reliable service to ratepayers.[17]

Q. DID THE COMPANY RESPOND TO YOUR RECOMMENDATION FOR NET LABOR EXPENSE?

A. Yes. Company witness Michael P. Weidner disagrees with my net labor expense recommendation.

[17] I&E Statement No. 1, pp. 11-13.

Q. SUMMARIZE MR. WEIDNER'S RESPONSE.

A. Mr. Weidner disagrees with my recommendation to remove the portion of executive bonuses attributable to achieving financial goals and targets. Mr. Weidner opines that goals related to achieving financial targets combined with goals that are related to providing safe and reliable service to ratepayers allow executives to manage the Company to provide the best results for ratepayers and are critical to maintain cost-effective access to capital. Mr. Weidner states that the Company's focus on cost savings and financial performance has allowed NFG to avoid filing a base rate case, which he points out was last filed in 2023 where the revenue requirement in the instant proceeding is less than the cost of inflation. Mr. Weidner asserts that incentive-based compensation ensures retention of key personnel, which benefits ratepayers. Mr. Weidner asserts that if there wasn't any form of incentive compensation, the Company would need to increase base salaries. Mr. Weidner also states that only executives have incentive compensation that is partially based on financial performance as it stresses the importance of cost containment thereby benefiting ratepayers. Finally, Mr. Weidner references a Korn Ferry Group report on the Company's compensation package for executives which includes base salary, short-term incentive compensation, and long-term incentive compensation and notes that it is at or below the median compared to other utility and general industry executives which

reinforces the need for incentive compensation consisting of goals related to providing safe and reliable service to ratepayers as well as financial goals.[18]

Q. WHAT IS YOUR RESPONSE TO MR. WEIDNER'S ASSERTIONS?

A. As stated in my direct testimony, the portion of executive bonuses attributable to financial goals serves to primarily benefit shareholders and not ratepayers.[19] Additionally, Mr. Weidner's claim that the achievement of financial goals benefits ratepayers is speculative and unsupported because there are no measurable or quantifiable benefits accruing directly to ratepayers specifically attributable to financial goals.

Therefore, the portion of executive bonuses attributable to financial goals should not be funded by ratepayers. Allowing this claim in rates would result in higher rates and revenues at the expense of ratepayers, while providing a benefit to the parent company and shareholders' financial goals. It is not obvious how the portion of executive bonuses attributable to financial goals directly relates to providing safe and reliable service to ratepayers. Therefore, all costs associated with executive bonuses related to financial goals should be paid for by shareholders, and not by ratepayers, as they are directly linked to the benefit of shareholders.

[18] NFG Statement No. 5-R, pp. 2-7.
[19] I&E Statement No. 1, pp. 10-11.

Q. DO YOU HAVE ANY CHANGES TO YOUR RECOMMENDATION FOR NET LABOR EXPENSE?

A. No. I continue to recommend an allowance of $40,212,325 for net labor expense, or a reduction of $379,731 ($40,592,056 - $40,212,325) to NFG's claim based on the removal of the portion of the executive bonus that is attributable to achieving financial goals which serve to primarily benefit shareholders and should not be funded by ratepayers as financial goals do not assist in providing safe and reliable service to ratepayers.

PAYROLL TAXES

Q. SUMMARIZE YOUR RECOMMENDATION IN DIRECT TESTIMONY FOR PAYROLL TAXES.

A. In direct testimony, I recommended an allowance of $2,376,894 for payroll taxes, or a reduction of $22,670 ($2,399,564 - $22,670) to the Company's claim. My recommendation was based on recognition of the net labor expense reduction for my removal of the portion of executive bonuses related to financial goals and on the payroll tax rate applied to the Company's claim.[20]

[20] I&E Statement No. 1, pp. 13-14.

Q. DID THE COMPANY RESPOND TO YOUR RECOMMENDATION FOR PAYROLL TAXES?

A. Yes. Company witness Michael P. Weidner disagrees with my payroll tax expense recommendation for the same reasons that he disagrees with my net labor expense recommendation.[21]

Q. DO YOU HAVE ANY CHANGES TO YOUR RECOMMENDATION FOR PAYROLL TAXES?

A. No. I continue to recommend an allowance of $2,376,894 for payroll taxes, or a reduction of $22,670 ($2,399,564 - $22,670) to the Company's claim based on recognition of the net labor expense reduction for my removal of the portion of executive bonuses related to financial goals and on the payroll tax rate applied to the Company's claim as calculated in my direct testimony.[22]

STOCK BASED COMPENSATION

Q. SUMMARIZE YOUR RECOMMENDATION IN DIRECT TESTIMONY FOR STOCK BASED COMPENSATION.

A. In direct testimony, I recommended an allowance of $520,678 for stock-based compensation, or a reduction of $909,281 ($1,429,959 - $520,678) to the Company's claim. My recommendation was based on the removal of 95% of the Company's claim for performance shares portion of the Company's claim for

[21] NFG Statement No. 5-R, pp. 2-3 and p. 6.
[22] I&E Statement No. 1, p. 14.

stock-based compensation as 95% of performance shares were based on financial goals which should not be funded by ratepayers as financial goals do not assist in providing safe and reliable service to ratepayers. I also referenced a recent Commission order where the Commission removed 70% of Columbia Gas of Pennsylvania, Inc.'s (Columbia Gas') total incentive compensation claim that was related to financial goals finding that it was not necessary in providing safe and reliable service to ratepayers.[23]

Q. DID THE COMPANY RESPOND TO YOUR RECOMMENDATION FOR STOCK-BASED COMPENSATION?

A. Yes. Company witness Michael P. Weidner disagrees with my stock-based compensation recommendation. Mr. Weidner asserts that if there was no form of stock-based compensation, the Company would need to increase base salaries. Mr. Weidner states that restricted stock is used to encourage retention of top performers and avoid costs associated with turnover. Mr. Weidner opines that these performance measures are achieved through cost containment, operational efficiency, and maintaining cost-effective access to capital that are accomplished through financial metrics which benefit ratepayers and should be included in rates.[24]

[23] I&E Statement No. 1, pp. 15-18.
[24] NFG Statement No. 5-R, pp. 7-11

Q. WHAT IS YOUR RESPONSE TO MR. WEIDNER'S ASSERTIONS?

A. As stated in my direct testimony, stock-based compensation being based on achieving financial goals and targets serve primarily to benefit shareholders and should not be funded by the ratepayers as financial goals do not assist in providing safe and reliable service to ratepayers and that the Commission has recently adjusted a company's incentive compensation claim to remove the amount attributable to financial goals.[25]

Mr. Weidner's claim that the achievement of financial goals or targets benefits ratepayers is speculative and unsupported because there are no measurable or quantifiable benefits accruing directly to ratepayers specifically attributable to performance shares.

Therefore, the performance shares in the Company's stock-based compensation claim should not be funded by ratepayers. Allowing this claim in rates would result in higher rates and revenues at the expense of ratepayers, while providing a benefit to the parent company and shareholders' financial goals. It is not obvious how the performance shares attributable to financial goals directly relates to providing safe and reliable service to ratepayers. Therefore, all costs associated with the performance shares that are related to financial goals should be paid for by shareholders, and not by ratepayers, as it is directly linked to the benefit of shareholders.

[25] I&E Statement No. 1, pp. 16-18.

Q. DO YOU HAVE ANY CHANGES TO YOUR RECOMMENDATION FOR STOCK-BASED COMPENSATION?

A. No. I continue to recommend disallowance of 95% of the Company's claim for performance shares of $909,281 ($957,138 x 95%) that are based on achieving financial goals and targets that serve primarily to benefit shareholders. This results in a recommended allowance of $520,678 for stock-based compensation, or a reduction of $909,281 ($1,429,959 - $520,678) to the Company's claim.

MEMBERSHIP DUES

Q. SUMMARIZE YOUR RECOMMENDATION IN DIRECT TESTIMONY FOR MEMBERSHIP DUES.

A. In direct testimony, I recommended an allowance of $212,298 for membership dues, or a reduction of $21,968 ($234,266 - $212,298) to the Company's claim. My recommendation was based on disallowing membership dues for civic and community organizations and other membership dues where the Company has not provided adequate support that the membership is necessary to provide safe and reliable service to the Company's ratepayers. My recommended allowance was based on the exclusion of the following membership dues for ratemaking purposes: Erie Downtown Development Corporation ($12,500), Pennsylvania Northwest Development Corp. ($2,813), Edison Electric Institute ($1,842), Common Ground Alliance ($1,250), Erie Club ($1,185), Independent Oil & Gas Association of New York ($693), Pittsburgh Region Clean Cities ($500), Clarion

County Economic Development ($500), Shenango Valley Chamber of Commerce of ($500), and Other of ($185).[26]

I also referenced a recent Commission order where the Commission removed membership dues that were related to chambers of commerce finding that it did not provide a direct benefit to ratepayers and noting that although the referenced Commission order specifically addressed only membership dues related to chambers of commerce, the Commission agreed with the Office of Consumer Advocate's testimony regarding the exclusion of membership dues in rates related to business network advocacy groups, fraternal, social service clubs, and chambers of commerce.[27]

Q. DID THE COMPANY RESPOND TO YOUR RECOMMENDATION FOR MEMBERSHIP DUES?

A. Yes. Company witness Anthony T. Formato responded to my membership dues recommendation. Mr. Formato disagrees with my recommendation as he asserts that the membership dues related to economic development and chambers of commerce assist in promoting strong, resilient communities with the Company's service territory and attract and retain new industrial and commercial customers, which allows fixed system costs to be spread over a larger usage base and would help in curbing the upward pressure on rates. Mr. Formato also asserts that participating in these organizations ensures energy infrastructure, safety, and

[26] I&E Statement No. 1, pp. 18-20.
[27] I&E Statement No. 1, pp. 20-21.

reliability considerations are incorporated into local growth planning which reduces long term system risks and costs. Finally, Mr. Formato states that participating in these organizations builds stronger communities, by supporting economic stability and affordable, reliable service over the long term, which benefits the Company, the ratepayers, and the community as a whole.[28]

Q. WHAT IS YOUR RESPONSE TO MR. FORMATO?

A. Mr. Formato did not provide data to support the claim that additional industrial and commercial customers would result in a reduction of costs passed along to residential customers. Additionally, the Company has not adequately supported his argument that memberships related to the various chambers of commerce, economic development corporations, and chambers of business and industry are necessary in providing safe and reliable service to its existing customers. Finally, as stated in my direct testimony, the Commission recently removed membership dues that were related to chambers of commerce finding that it did not provide a direct benefit to ratepayers and agreed with the Office of Consumer Advocate regarding the exclusion of membership dues in rates related to business network advocacy groups, fraternal, social service clubs, and chambers of commerce.[29]

[28] NFG Statement No. 3-R, pp. 8-9.
[29] I&E Statement No. 1, pp. 20-21.

Q. DO YOU HAVE ANY CHANGES TO YOUR RECOMMENDATION FOR MEMBERSHIP DUES?

A. No. I continue to recommend an allowance of $212,298 for membership dues, or a reduction of $21,968 ($234,266 - $212,298) to the Company's claim based on disallowing membership dues for civic and community organizations and other membership dues where the Company has not provided adequate support that the membership is necessary to provide safe and reliable service to the Company's ratepayers.

CASH WORKING CAPITAL

Q. SUMMARIZE YOUR RECOMMENDATION IN DIRECT TESTIMONY FOR CASH WORKING CAPITAL (CWC).

A. In direct testimony, I recommended an allowance of $6,643,822 or a decrease of $111,005 ($6,754,827 - $6,643,822) to the Company's claim. My recommendation was based on my adjustments to O&M expenses and I&E's recommended cost of long-term debt ratio of 45% in direct testimony.[30]

Q. DID THE COMPANY RESPOND TO YOUR CWC RECOMMENDATION?

A. Yes. Company witness Monika M. Duszenko disagrees with my O&M adjustments used to determine my cash working capital recommendation.[31]

[30] I&E Statement No. 1, pp. 21-24.
[31] NFG Statement No. 6-R, p. 4.

Q. DID THE COMPANY PROVIDE AN UPDATED CWC CLAIM?

A. Yes. The Company's updated claim for CWC is $6,715,156.[32]

Q. DO YOU HAVE AN UPDATE TO YOUR CWC RECOMMENDATION DUE TO THE I&E RECOMMENDED ADJUSTMENTS TO O&M EXPENSES?

A. Yes. As stated in direct testimony, all O&M expense adjustments that are cash-based expense claims are included when determining the Company's overall CWC requirement. Therefore, I have included cash-based O&M recommendations when computing the overall recommended CWC allowance. I have also included in my updated CWC recommendation I&E's recommended cost of long-term debt ratio of 45%.[33]

Q. SUMMARIZE WHERE EACH OF THE RECOMMENDED O&M EXPENSE ADJUSTMENTS ARE REFLECTED IN THE CWC COMPUTATIONS.

A. The Net Labor Expense adjustment of $379,731 is reflected in the Payroll (Net Labor) Lag Days calculation. The following recommended adjustments are reflected in the Other Expenses (less Uncollectibles and Prepaid Expenses) Lag Days calculation: rate case expense adjustment of $137,600, payroll taxes adjustment of $22,670, stock-based compensation adjustment of $909,281, and

[32] NFG Exhibit A – FPFTY Rebuttal Update, Schedule C-4, p. 1, line 5.
[33] I&E Exhibit No. 1-SR, Schedule 1.

membership dues adjustment of $21,968 as discussed above, producing a total decrease of $1,091,519,[34] which is reflected in I&E Exhibit No. 1-SR, Schedule 1, p. 2.

Summary of I&E-Updated Recommended CWC Allowance

Q. BASED ON THE ABOVE TESTIMONY, WHAT IS YOUR UPDATED RECOMMENDED ALLOWANCE FOR CWC?

A. Based on reflecting all of I&E's recommended adjustments as discussed above, my updated recommendation for CWC is an allowance of $6,604,532 or a decrease of $110,624 ($6,715,156 - $6,604,532) to the Company's updated claim.[35]

Q. IS YOUR UPDATED RECOMMENDATION FOR CWC A FINAL RECOMMENDED ALLOWANCE?

A. No. As stated in my direct testimony, all adjustments to the Company's claims must be continually brought together in the Administrative Law Judge's Recommended Decision and again in the Commission's Final Order. This process, known as iteration, effectively prevents the determination of a precise calculation until all adjustments have been made to the Company's claims.

[34] I&E Exhibit No. 1-SR, Schedule 1, p. 4.
[35] I&E Exhibit No. 1-SR, Schedule 1, p. 1.

ENERGY EFFICIENCY PILOT PROGRAM

Q. SUMMARIZE YOUR RECOMMENDATION IN DIRECT TESTIMONY FOR THE COMPANY'S ENERGY EFFICIENCY (EE) PILOT PROGRAM.

A. In direct testimony, I did not oppose the Company's proposal to establish and implement an EE plan in this proceeding, however, I recommended that the Company submit an annual report on the EE Pilot three months after the close of the program year. The annual report would include information from activity from the previous program year and progress towards the Company's goals for the remaining years of the EE Pilot. The information to be included in the annual report would also include, but not be limited to, savings (cost and Mcf), participation (by number of customers and type of rebate), spending, cost-effectiveness, highlights of portfolio and program activity, and updates to program delivery and design. Additionally, the annual report would include the above information broken down for low-income customers as well as the number of referrals made to LIURP and the number of referrals to LIURP that received LIURP services as a result of participating in the EE pilot.[36]

Q. DID THE COMPANY RESPOND TO YOUR RECOMMENDATION FOR THE COMPANY'S PROPOSED EE PLAN?

A. Yes. Company witness Erik M. Solomon responded to my recommendation.

[36] I&E Statement No. 2, pp. 28-32.

Q. SUMMARIZE MR. SOLOMON'S RESPONSE.

A. Mr. Solomon states that the Company supports reasonable reporting requirements as it promotes transparency, accountability, and Commission visibility into the program's performance. Mr. Solomon also states that the reporting requirements should be related to the scale and nature of the EE Pilot. Mr. Solomon states the Company agrees with my recommendations regarding the tracking of low-income tracking and referral reporting and annual reporting on the EE Pilot as long as the reporting requirements are clearly defined and limited to information needed to evaluate the EE Pilot's performance. Finally, Mr. Solomon states that the Commission should adopt the reporting requirements that are consistent with my recommendation if they are not overly burdensome, duplicative, or inconsistent with the purpose of the EE Pilot.[37]

Q. WHAT IS YOUR RESPONSE TO MR. SOLOMON?

A. I agree with Mr. Solomon that the annual reporting requirements should not be burdensome, duplicative, or inconsistent with the purpose of the EE Pilot as the purpose of the annual reporting is to evaluate the EE Pilot's performance. I believe that my recommendation would be useful in evaluating the EE Pilot's performance and assist in making potential adjustments to the EE Pilot in the future.

[37] NFG Statement No. 18, pp. 8-11.

Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

A. Yes. However, I reserve the right to supplement my testimony or to revise recommendations if additional issues or facts arise during this proceeding.

I&E Exhibit No. 1-SR
Witness: Christopher Keller

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

Docket No. R-2025-3059428

Exhibit to Accompany

the

Surrebuttal Testimony

of

Christopher Keller

Bureau of Investigation and Enforcement

Concerning:

Operating and Maintenance Expenses
Taxes Other Than Income
Cash Working Capital
Energy Efficiency Pilot Program

-- I&E Modified --

Schedule: **C-4**
Witness: **M. M. Duszenko**
Page: **1 of 5**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

I&E Exhibit No. 1-SR
Schedule 1
Page 1 of 4

Working Capital

Line No	Description	[1] Fully Projected Future Test Year October 31, 2027	[2] Reference
1	Working Capital for O&M Expenses	$ 7,099	C-4, Page 2
2	Interest Payments	(1,733)	C-4, Page 3
3	Tax Payment Lag Calculations	158	C-4, Page 4
4	Prepaid Expenses	1,080	C-4, Page 5
5	Total Working Capital Requirements	$ 6,605	

(a) Ref: I&E Exhibit No. 1-SR, Schedule 1, p. 2.
(b) Ref: I&E Exhibit No. 1-SR, Schedule 1, p. 3.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

I&E Exhibit No. 1-SR
Schedule 1
Page 2 of 4

Summary of Working Capital

Line #	Description	[1] Reference	[2] Test Year Expenses		[3] Lead/Lag Days	[4] Weighted Average [2] * [3]	[5] Totals
WORKING CAPITAL REQUIREMENT							
1	REVENUE LAG DAYS	C-4, Page 3-5, HTY					47.16
2	EXPENSE LAG DAYS						
3	Purchased Gas Costs	Schedule A-1	$ 124,571		39.83	$ 4,961,646	
4	Other Expenses (less Uncollectibles and Prepaid Expenses)	Exhibit No. ATF-1 Schedule 1	31,924	(a)	41.01	1,309,205	
5	Payroll (Net Labor)	Exhibit No. ATF-1 Schedule 1	40,212	(b)	10.32	414,991	
6	Total	Sum (L 3 to L 5)	$ 196,707			$ 6,685,842	
7	O & M Expense Lag Days	L6, Col. 4 / Col. 2					33.99
8	Net (Lead) Lag Days	Line 1 - Line 7					13.17
9	Operating Expenses Per Day	Line 6, Col. 2 / 365					$ 539
10	Working Capital for O & M Expense	Line 8 * Line 9					$ 7,099
11	Interest Payments	Page 3					(1,733)
12	Tax Payment Lag Calculations	Page 4					158
13	Prepaid Expenses	Page 5					1,080
14	Total Working Capital Requirement	Sum (Line 10 to Line 13)					$ 6,605

(a) I&E Exhibit No. 1-SR, Schedule 1, p. 4.
(b) I&E Statement No. 1-SR, p. 3.

-- I&E Modified --

Schedule: C-4
Witness: M. M. Duszenko
Page: 3 of 5

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
Before the Pennsylvania Public Utility Commission
Fully Projected Future Test Period - 12 Months Ended October 31, 2027
($ in Thousands)

I&E Exhibit No. 1-SR
Schedule 1
Page 3 of 4

Interest Payments

Line No.	Description	[1] Reference Or Factor	[2] # of Days	[3] # of Days	[4] Total
1	Rate Base of October 31, 2027	Sch C-1			$ 571,456
2	Long-term Debt Ratio	Sch B-7			45.00% (a)
3	Embedded Cost of Long-term Debt	Sch B-7			5.58%
4	Pro forma Interest Expense	L 1 * L 2 * L 3			$ 14,349
5	Daily Amount	L 4 / L 5 [Col 2]	365		$ 39
6	Days to mid-point of interest payments			91.25	
7	Less: Revenue Lag Days	Page 2		47.16	
8	Interest Payment lag days	L 7 - L 6			(44.1)
9	Total Interest for Working Capital	L 5 * L 8			$ (1,733)

(a) Ref: I&E Statement No. 2-SR.

National Fuel Gas Distribution Corporation
Cash Working Capital Other Expense (less Uncollectibles) Adjustment
For the Twelve Months Ended October 31, 2027

		I&E Recommended Adjustment
1	Rate Case Expense	($137,600)
2	Payroll Taxes	(22,670)
3	Stock Based Compensation	(909,281)
4	Membership Dues	(21,968)
5	Total	($1,091,519)

Ref: I&E Statement No. 1-SR, p. 3.

I&E Statement No. 2
Witness: Drew Breuning

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

Docket No. R-2025-3059428

Direct Testimony

of

Drew Breuning

Bureau of Investigation and Enforcement

Concerning:

Rate of Return

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INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Drew Breuning. My business address is Pennsylvania Public Utility Commission, Commonwealth Keystone Building, 400 North Street, Harrisburg, PA 17120.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by the Pennsylvania Public Utility Commission (Commission) in the Bureau of Investigation & Enforcement (I&E) as a Fixed Utility Financial Analyst.

Q. SUMMARIZE YOUR EDUCATION AND EMPLOYMENT HISTORY.

A. An outline of my education and employment history is attached as Appendix A.

Q. PLEASE DESCRIBE THE ROLE OF I&E IN RATE PROCEEDINGS.

A. I&E is responsible for protecting the public interest in proceedings before the Commission. I&E's analysis in this proceeding is based on its responsibility to represent the public interest. This responsibility requires balancing the interests of ratepayers, the regulated utility, and the regulated community as a whole.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to review the base rate filing of National Fuel Gas Distribution Corporation (NFG or Company) and make recommendations regarding the Company's rate of return, including capital structure, cost of long-term debt, the cost of equity, and the overall fair rate of return for the fully projected future test year (FPFTY) ending October 31, 2027.

Q. DOES YOUR TESTIMONY INCLUDE AN EXHIBIT?

A. Yes. I&E Exhibit No. 2 contains schedules that support my direct testimony.

BACKGROUND

Q. WHAT IS THE GENERAL DEFINITION OF RATE OF RETURN IN THE CONTEXT OF A BASE RATE CASE?

A. Rate of return is one of the components of the revenue requirement formula. Rate of return is the amount of revenue an investment generates in the form of net income. It is typically expressed as a percentage of the amount of an asset base at a particular point in time, which in base rate proceedings, is the projected rate base balance at the end of the test year.

Q. WHAT IS THE REVENUE REQUIREMENT FORMULA?

A. The revenue requirement formula used in base rate cases is as follows:

RR = E + D + T + (RB x ROR)

Where:

RR	=	Revenue Requirement
E	=	Operating Expenses
D	=	Depreciation Expense
T	=	Taxes
RB	=	Rate Base
ROR	=	Overall Rate of Return

In the above formula, the rate of return is expressed as a percentage. The calculation of that percentage is independent of the determination of the appropriate rate base value for ratemaking purposes. As such, the appropriate total dollar return is dependent upon the proper computation of the rate of return and the proper valuation of the company's rate base.

Q. WHAT CONSTITUTES A FAIR AND REASONABLE OVERALL RATE OF RETURN?

A. A fair and reasonable overall rate of return is one that will allow the utility an *opportunity* to recover those costs prudently incurred by all classes of capital used to finance the rate base during the prospective period in which its rates will be in effect. The Commission has the authority to determine the fair revenue

requirement and rate of return, which the utility has the opportunity to earn, but is not guaranteed to earn.

The *Bluefield Water Works & Improvements Co. v. Public Service Comm. of West Virginia,* 262 U.S. 679, 692-93 (1923), and the *Federal Power Commission et al v. Hope Natural Gas Co.,* 320 U.S. 591, 603 (1944) cases set forth the principles that are generally accepted by regulators throughout the country as the appropriate criteria for measuring a fair rate of return:

1. A utility is entitled to a return similar to that being earned by other enterprises with corresponding risks and uncertainties, but not as high as those earned by highly profitable or speculative ventures.
2. A utility is entitled to a return level reasonably sufficient to assure financial soundness.
3. A utility is entitled to a return sufficient to maintain and support its credit and raise necessary capital.
4. A fair return can change (increase or decrease) along with economic conditions and capital markets.

Q. EXPLAIN HOW THE OVERALL RATE OF RETURN IS TRADITIONALLY CALCULATED IN BASE RATE PROCEEDINGS.

A. In base rate proceedings, the overall rate of return is traditionally calculated using the weighted average cost of capital method. To calculate the weighted average cost of capital, a company's capital structure must first be determined by

comparing the percentage of each capitalization component, which has financed rate base, to total capital. Next, the effective cost rate of each capital structure component must be determined. The historical component of the cost rate of debt can be computed accurately, and any future debt issuances are based on estimates. The cost rate of common equity is not fixed and is more difficult to measure. Because of this difficulty, a proxy group is used as discussed later in this testimony. Next, each capital structure component percentage is multiplied by its corresponding effective cost rate to determine the weighted capital component cost rate. The I&E table in the *"I&E Position"* section below demonstrates the interaction of each capital structure component and its corresponding effective cost rate. Finally, the sum of the weighted cost rates produces the overall rate of return. This overall rate of return is multiplied by the rate base to determine the return portion of a company's revenue requirement.

COMPANY'S RATE OF RETURN CLAIM

Q. WHO IS THE COMPANY'S RATE OF RETURN WITNESS?

A. Joshua C. Nowak, Vice President at Concentric Energy Advisors, Inc., is the primary witness addressing rate of return and cost of common equity for NFG (NFG Statement No. 10). Additionally, James C. Welch (NFG Statement No. 11) provides testimony regarding the Company's cost of long-term debt and analysis for the claimed capital structures. Finally, Rebecca E. Hillery, Managing Director

of Rates and Regulatory Affairs for NFG, provides testimony regarding the Company's "Management Performance" claims (NFG Statement No. 1).

Q. PLEASE SUMMARIZE THE COMPANY'S RATE OF RETURN CLAIMS.

A. Mr. Nowak recommends the following rate of return for the Company based on the FPFTY ending October 31, 2027:[1]

Company			
Summary of Cost of Capital			
Type of Capital	**Ratio**	**Cost Rate**	**Weighted Cost**
National Fuel Gas Distribution Corporation			
Long-Term Debt	43.60%	5.58%	2.44%*
Common Equity	56.40%	11.25%	6.34%*
Total	100.00%		8.78%

*Rounding error. Correct figures are 2.43% and 6.35%.

I&E POSITION

Q. PLEASE SUMMARIZE YOUR RATE OF RETURN RECOMMENDATION.

A. I recommend the following rate of return for the Company:[2]

[1] NFG Statement No. 10, p. 55, line 18.
[2] I&E Exhibit No. 2, Schedule 1.

I&E			
Summary of Cost of Capital			
Type of Capital	**Ratio**	**Cost Rate**	**Weighted Cost**
National Fuel Gas Distribution Corporation			
Long-Term Debt	45.00%	5.58%	2.51%
Common Equity	55.00%	9.81%	5.40%
Total	100.00%		7.91%

Q. HOW HAVE YOU CALCULATED YOUR RECOMMENDED RETURN ON EQUITY?

A. My recommended return on equity of 9.81% is based on the average of the following results:

DCF Result	10.47%
Average of I&E Calculated CAPM Result and Kroll CAPM Result	9.25%
National Average of Natural Gas Distribution Authorized ROEs from S&P Global	9.70%
Average*	**9.81%**

*(10.47% + 9.25% + 9.70%) / 3 = 9.81%

As explained in further detail below, my return on equity recommendation is calculated using the DCF method, the average of two variations of the CAPM method, and the recent national average authorized return on equity for rate cases involving natural gas distribution utilities.

PROXY GROUP

Q. WHAT IS A PROXY GROUP AS USED IN BASE RATE CASES?

A. A proxy group is a set of companies that have similar traits in comparison to the subject utility. This group of companies acts as a benchmark for determining the subject utility's rate of return in a base rate case.

Q. WHAT ARE THE REASONS FOR USING A PROXY GROUP?

A. A proxy group's cost of equity is used as a benchmark to satisfy the long-established guideline of utility regulation that seeks to provide the subject utility with the opportunity to earn a return similar to that of enterprises with corresponding risks and uncertainties.

A proxy group is typically employed since the use of data exclusively from one company may be less reliable. The lower reliability occurs because the data for one company may be subject to events that can cause short-term anomalies in the marketplace. The rate of return on common equity for a single company could become distorted in these circumstances and would therefore not be representative of similarly situated companies. A proxy group has the effect of smoothing out potential anomalies associated with a single company.

Q. WHAT CRITERIA DID YOU USE IN SELECTING YOUR UTILITY PROXY GROUP?

A. The criteria for my proxy group was designed to select companies that are representative of the Company. I applied the following criteria to Value Line's "Natural Gas Utility" company group:

1. Fifty percent or more of the company's revenues must be generated from the regulated gas utility industry.
2. The company's stock must be publicly traded.
3. Investment information for the company must be available from more than one source, which includes Value Line.
4. The company must not be currently involved in an announced merger or the target of an acquisition.
5. The company must have four consecutive years of historic earnings data.
6. The company must be operating in a state that has a deregulated natural gas utility market.

Q. WHAT CRITERIA DID MR. NOWAK USE IN SELECTING HIS NATURAL GAS PROXY GROUP COMPANIES?

A. Mr. Nowak determined his proxy group of seven natural gas companies by using the following criteria:[3]

1. The company must consistently pay quarterly cash dividends.

[3] NFG Statement No. 10, p. 24, line 14 through p. 25, line 7.

2. The company must have an investment-grade long-term issuer rating (BBB- or higher) from S&P.

3. The company must be consistently covered by more than one utility industry equity analyst.

4. The company must have positive earnings growth rates from at least two sources.

5. The company's regulated net operating income makes up more than 50 percent of the consolidated company's regulated net operating income, on average, over the three years ended 2024.

6. The company's regulated net operating income from regulated natural gas distribution makes up more than 60 percent of the consolidated company's regulated net operating income, on average, over the three years ended 2024.

7. The company must not be involved in merger activity or other transformative transaction.

Q. WHAT PROXY GROUP DID YOU USE IN YOUR ANALYSIS?

A. I include the following six companies in my proxy group:[4]

Atmos Energy Corporation	ATO
Chesapeake Utilities Corp.	CPK
New Jersey Resources Corporation	NJR
NiSource Inc.	NI
Northwest Natural Holding Company	NWN
ONE Gas, Inc.	OGS

Q. WHAT PROXY GROUP DID MR. NOWAK USE IN HIS ANALYSIS?

A. Mr. Nowak included the following seven companies in his proxy group:[5]

Atmos Energy Corporation	ATO
New Jersey Resources Corporation	NJR
NiSource Inc.	NI
Northwest Natural Holding Company	NWN
ONE Gas, Inc.	OGS
Southwest Gas Holdings, Inc.	SWX
Spire, Inc.	SR

Q. DO YOU AGREE WITH MR. NOWAK'S PROXY GROUP?

A. Not entirely. While we do have five companies that match, I include one company that Mr. Nowak does not, and Mr. Nowak includes two companies that I do not.

[4] I&E Exhibit No. 2, Schedule 2.
[5] NFG Statement No. 10, p. 25, line 12.

Q. PLEASE IDENTIFY THE COMPANIES MR. NOWAK HAS INCLUDED THAT YOU DO NOT AND EXPLAIN WHY YOU HAVE EXCLUDED THEM FROM YOUR PROXY GROUP.

A. I have excluded Southwest Gas Holdings, Inc. (SWX) and Spire, Inc. (SR) from my proxy group.

Q. MR. NOWAK HAS INCLUDED SOUTHWEST GAS HOLDINGS, INC. IN HIS PROXY GROUP AND YOU DID NOT. PLEASE EXPLAIN.

A. I have excluded SWX from my proxy group, as this company did not meet my first criterion that fifty percent or more of the company's revenues must be generated from the regulated gas utility industry. SWX generates only 48.42% of its revenue from its regulated gas utility. This is important because revenues represent the percentage of cash flow a company receives from each business line related to providing a good or service. If less than fifty percent of revenues come from the regulated gas sector, the company is not comparable to the subject utility and does not provide a similar level of regulated business. Therefore, I did not include SWX in my proxy group.

Q. MR. NOWAK HAS INCLUDED SPIRE, INC. IN HIS PROXY GROUP AND YOU DID NOT. PLEASE EXPLAIN.

A. I have excluded SR from my proxy group, as this company did not meet my fourth criterion that a company must not currently be involved in a significant merger or acquisition at the time of my analysis.

On July 29, 2025, Spire, Inc. announced that they would purchase Piedmont Natural Gas Co., Inc. for $2.5 billion, a deal which is expected to close in the first quarter of 2026.[6] A company's involvement in a major transaction such as this can artificially and temporarily impact its financial metrics, which could influence the results of the proxy group. Therefore, I did not include SR in my proxy group, and I do not agree with Mr. Nowak's assertion that SR's acquisition does not have a transformative effect on the company.

Mr. Nowak also opines that "Since the announcement in July 2025, there has been no meaningful change in SR's stock price performance relative to other utility companies".[7] However, from the announcement of the acquisition on July 29, 2025, until March 19, 2026, Spire, Inc.'s stock price has seen a significantly larger increase than the remainder of Mr. Nowak's proxy group. His proxy group without SR saw an average stock price increase of 16.36% over this span, while SR grew 25.64%.[8] In summary, SR's stock price grew 56.7% ((25.64% - 16.36%)

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6 Spire Inc. to acquire Business of Piedmont Natural Gas Company, Inc. (MI Deal Key: 2161177; SPCIQ TRANSACTION ID: 1954963159) | Deal Profile https://www.capitaliq.spglobal.com/apisv3/spg-webplatform-core/mna/dealOverview?Id=2161177

7 NFG Statement No. 10, p. 26, lines 7-9.

8 I&E Exhibit No. 2, Schedule 3.

÷ 16.36%) more than did the average of the proxy group during the same period, which I believe to be a significant amount. Therefore, I maintain my position that SR is an inappropriate inclusion in Mr. Nowak's proxy group.

CAPITAL STRUCTURE

Q. WHAT IS A CAPITAL STRUCTURE?

A. A capital structure represents how a firm has financed its rate base with different sources of funds. The primary funding sources are long-term debt and common equity. A capital structure may also include preferred stock and/or short-term debt, which is not the case for the Company.

Q. WHAT IS THE CLAIMED CAPITAL STRUCTURE USED BY THE COMPANY?

A. The Company is proposing a forecasted capital structure which is summarized in the table below:[9]

Type of Capital	Ratio
Long-Term Debt	43.60%
Common Equity	56.40%
Total	**100.00%**

[9] NFG Statement No. 10, p. 54, lines 15-18.

Q. WHAT IS THE BASIS FOR THE COMPANY'S CLAIMED CAPITAL STRUCTURE?

A. Mr. Nowak relies on Mr. Welch's analysis, which explains that the claimed capital structure is based on the Company's current projected capital structure at the end of the FPFTY ending October 31, 2027.[10] Further, Mr. Nowak claims the common equity ratio claimed by the Company is appropriate and consistent with the range of common equity ratios maintained by the operating utility subsidiaries of his proxy group.[11]

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE COMPANY'S CAPITAL STRUCTURE?

A. I recommend using a capital structure of 55% common equity and 45% long-term debt.

Q. WHAT IS THE BASIS FOR YOUR CAPITAL STRUCTURE RECOMMENDATION?

A. It is my opinion that the Company's proposed capital structure is unreasonable for ratemaking purposes. The Company's proposed capital structure falls close to the highest end of the range of my proxy group's 2024 (most recent available) capital structures, where the most recent five-year average range contains individual

[10] NFG Statement No. 11, p. 5, lines 1-4.
[11] NFG Statement No. 10, p. 55, lines 1-10.

company capital structure ratios from 39.53% to 58.23% long-term debt and 36.62% to 60.47% equity, with an overall five-year average of 50.40% long-term debt and 48.70% common equity.[12] NFG's proposed equity percentage of 56.40% is considerably higher than the proxy group's average equity percentage of 48.70%.

Q. WHY HAVE YOU LIMITED THE EQUITY RATIO PORTION OF THE CAPITAL STRUCTURE IN YOUR ANALYSIS TO 55%?

A. I believe that limiting a company's capital structure from becoming too equity heavy is reasonable and necessary for a fair ratemaking process. Implementing a capital structure that is closer to 50% long-term debt and 50% common equity is commonly considered optimal when trying to balance the financial integrity of a utility and its impact on ratepayers. While it is not always possible to have a capital structure that is exactly 50/50, implementing a limit helps strike a balance between rewarding the company for carrying more equity while also reducing the costs that would be passed on to ratepayers. For that reason, it is my opinion that the Company's capital structure should not exceed 55% equity.

[12] I&E Exhibit No. 2, Schedule 4.

Q. HAS THE COMMISSION COMMENTED ON NFG'S CURRENT CAPITAL STRUCTURE?

A. Yes. Commissioner Barrow expressed particular concern regarding the financial impact on customers in relation to equity heavy capital structures. She states, "… I urge the parties to take a critical look at the Company's requested rate of return and return on equity (ROE) as well as the capital structure (common equity ratio and debt capital) to ensure reasonableness. Deviations in each of these items translate into millions of dollars charged to customers of all rate classes."[13]

Additionally, Commissioner Barrow previously commented on Columbia Gas' recently requested capital structure of 54.4% equity and 45.6% debt. The Office of Consumer Advocate and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania argued in favor of a hypothetical 50/50 capital structure, citing their proxy group's average capital structure was 45% equity and 55% debt. Commissioner Barrow stated that the discrepancy between the proxy group and Columbia Gas' capital structure makes it necessary for an adjustment to the Company's capital structure, and that a 50/50 capital structure "is a better representation of the Company's **actual** financial risk and would have resulted in millions of dollars in reduced revenue requirement for the Company and resultant lower rates for Columbia Gas' customers."[14]

[13] I&E Exhibit No. 2, Schedule 5.
[14] I&E Exhibit No. 2, Schedule 6.

Q. WHAT IS THE RECENT NATIONAL AVERAGE AUTHORIZED CAPITAL STRUCTURE FOR GAS DISTRIBUTION UTILITIES ACROSS THE U.S.?

A. According to data gathered from S&P Global Market Intelligence, the average authorized equity ratio for natural gas distribution cases in the United States from January 2025 to March 2026 was 51.62%.[15]

Q. HAVE YOU CONSIDERED WHAT CAPITAL STRUCTURES ARE PROJECTED TO BE FOR THE NATURAL GAS UTILITY INDUSTRY IN THE NEAR FUTURE?

A. Yes. According to Value Line's 2027 estimates, the projected capital structures for my proxy group companies are as follows:

Value Line 2027 Capital Structure Projections

		Long-Term Debt Ratio	Common Equity Ratio
Atmos Energy Corp	ATO	40.00%	60.00%
Chesapeake Utilities	CPK	48.50%	51.50%
New Jersey Resources Corp	NJR	55.50%	44.50%
Nisource Inc	NI	55.00%	45.00%
Northwest Natural	NWN	55.00%	45.00%
ONE Gas Inc.	OGS	44.00%	56.00%
Average		49.67%	50.33%

These future projections are consistent with the proxy group's historical five-year average capital structure of 48.70% equity and 50.40% debt.

[15] I&E Exhibit No. 2, Schedule 7.

NFG's claimed capital structure of 56.40% equity and 43.60% debt is considerably more equity-heavy than the proxy group's five-year averages, Value Line's 2027 projections, and the recent national authorized capital structures for natural gas distribution utilities. This equity-heavy capital structure must be recognized when considering NFG's financial risk, as higher equity ratios generally correspond with lower financial risk as Mr. Nowak himself concedes. He agrees that all other things being equal, a company with a higher equity ratio faces less financial risk than a company with a lower equity ratio.[16]

For consideration when examining the Company's overall financial risk, the table below illustrates the cost savings to ratepayers if the Company were to employ an optimal 50% long-term debt and 50% common equity capital structure in its cost of capital while maintaining its claimed return on equity and rate base:

[16] I&E Exhibit No. 2, Schedule 8.

National Fuel Gas Distribution Corporation			
Summary of Cost of Capital			
Type of Capital	**Ratio**	**Cost Rate**	**Weighted Cost**
AS FILED CAPITAL STRUCTURE			
Long-Term Debt	43.60%	5.58%	2.43%
Common Equity	56.40%	11.25%	6.35%
Total	100.00%		8.78%
50/50 OPTIMAL CAPITAL STRUCTURE			
Long-Term Debt	50.00%	5.58%	2.79%
Common Equity	50.00%	11.25%	5.63%
Total	100.00%		8.42%
Difference In The Overall Rate of Return (8.78% - 8.42% = 0.36%)			0.36%
Impact Prior to Gross Up (Claimed Rate Base* x Difference In The Overall Rate of Return) ($571,582,000 x .0036)			$2,057,695
Gross Revenue Conversion Factor**			1.3899
Total Impact To Ratepayers ($2,057,695 x 1.3899)			**$2,859,991**
*NFG Exhibit A, Schedule A-1, Line 9. **NFG Exhibit A, Schedule A-1, Line 25.			

In this example, if the Company were to employ a 50/50 capital structure and no change to the cost of debt or requested return on equity, the cost savings to ratepayers would be $2,859,991. While I understand that achieving and maintaining an exact 50/50 capital structure is not always feasible, this example is intended to demonstrate NFG's financial security as compared to its peers.

COST OF LONG-TERM DEBT

Q. WHAT IS THE COMPANY'S CLAIMED COST RATE OF LONG-TERM DEBT?

A. The Company's claimed long-term debt cost rate is 5.58% for the FPFTY.[17]

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE COMPANY'S COST RATE OF LONG-TERM DEBT?

A. I recommend using the Company's claimed long-term debt cost rate of 5.58% for the FPFTY.

Q. WHAT IS THE BASIS FOR YOUR RECOMMENDATION TO USE THE COMPANY'S COST RATES OF LONG-TERM DEBT?

A. I accept NFG's claimed debt cost because it falls within my proxy group's implied long-term debt cost range of 2.54% to 6.49%, with an average implied long-term debt cost of 4.69% for 2024.[18] The Company's cost rate of long-term debt is also below the Mergent Bond Record average yield of 5.76% for the period of February 2025 through January 2026 for A-rated public utility bonds.[19] I recommend that the Company's claimed cost rate of long-term debt be used since it is reasonable and falls within the metrics described above.

[17] NFG Statement No. 11, p. 8, lines 4-6.
[18] I&E Exhibit No. 2, Schedule 9.
[19] I&E Exhibit No. 2, Schedule 10.

COST OF COMMON EQUITY

Common Methods

Q. WHAT METHODS ARE COMMONLY PRESENTED BY UTILITIES IN DETERMINING THE COST OF COMMON EQUITY?

A. Four methods commonly presented to estimate the cost of common equity are the Discounted Cash Flow (DCF) Method, the Capital Asset Pricing Model (CAPM), the Risk Premium (RP) Method, and the Comparable Earnings (CE) Method.

Q. WHAT IS THE THEORETICAL BASIS FOR THE DCF METHOD?

A. The DCF method is the "dividend discount model" of financial theory, which maintains that the value (price) of any security or commodity is the discounted present value of all future cash flows. The DCF method assumes that investors evaluate stocks in the traditional economic framework, which maintains that the value of a financial asset is determined by its earning power, or its ability to generate future cash flows. The DCF method is also considered a forward-looking model to estimate the cost of common equity.

Q. WHAT IS THE THEORETICAL BASIS FOR THE CAPM?

A. The CAPM describes the relationship between a stock's investment risk and its market rate of return. It identifies the rate of return investors expect so that it is comparable with returns of other stocks of similar risk. This method hypothesizes that the investor-required return on a company's stock is equal to the return on a

"risk free" asset plus an equity premium reflecting the company's investment risk. In the CAPM, two types of risk are associated with a stock: (1) firm-specific risk (unsystematic risk); and (2) market risk (systematic risk), which is measured by a firm's beta. The CAPM allows for investors to receive a return only for bearing systematic risk. Unsystematic risk is assumed to be diversified away, and therefore, does not earn a return.

Q. WHAT IS THE THEORETICAL BASIS FOR THE RP METHOD?

A. The theoretical basis for the RP method is a simplified version of the CAPM. The RP method's theory is that common stock is riskier than debt, thus, investors require a higher expected return on stocks than bonds. In the RP approach, the cost of equity is made up of the cost of debt and a risk premium. While the CAPM uses the market risk premium, it also directly measures the systematic risk of a company group through the use of beta. The RP method does not measure the specific risk of a company.

Q. WHAT IS THE THEORETICAL BASIS FOR THE CE METHOD?

A. The CE method utilizes the concept of opportunity cost. This means that investors will likely dedicate their capital to the investment offering the highest return with similar risk to alternative investments. Unlike the DCF, CAPM, and the RP methods, the CE method is not market-based and relies upon historic accounting data. Similar to the RP method, the CE method does not measure the specific risk

of a company. The most problematic issue with the CE method is determining what constitutes comparable companies.

Q. WHAT METHODS DO YOU RECOMMEND USING TO DETERMINE AN APPROPRIATE COST OF COMMON EQUITY FOR THE COMPANY?

A. I recommend using a combination of methods to determine the appropriate cost of common equity. I have employed the DCF, two versions of the CAPM, and have incorporated the recent average national authorized return on equity for gas distribution companies. I have used the DCF and CAPM because they have the most wide-spread regulatory acceptance, and the Commission has more recently based its ROE decisions on a combination of the DCF and CAPM methods. Additionally, the average authorized returns for gas distribution utilities from across the nation in rate case decisions should be considered, as it aligns with the guidance derived from the *Hope* and *Bluefield* cases that the subject utility is entitled to a return similar to that being earned by comparable enterprises.

Q. PLEASE EXPLAIN WHY YOU CHOSE TO USE THE DCF IN YOUR ANALYSIS TO HELP DETERMINE YOUR RECOMMENDED RETURN ON EQUITY.

A. I have used the DCF for a variety of reasons. First, the DCF is appealing to investors as it is based upon the concept that the receipt of dividends in addition to the expected appreciation is the total return requirement determined by the

market.[20] Second, the use of a growth rate and expected dividend yield are also strengths of the DCF, as this recognizes the time value of money and is forward-looking. Third, the use of the utility's own, or in this case, the proxy group's stock prices and growth rates directly in the calculation makes the DCF industry and company specific. Finally, current inflationary and economic trends are most certainly reflected in a stock's price, which is used in determining the dividend yield, and by analysts who generate forecasted earnings growth rates. Therefore, the DCF contains the most up-to-date projected information of any model and is the superior method for determining the rate of return for the current economic market because it measures the cost of equity directly.

Q. PLEASE EXPLAIN WHY YOU CHOSE TO USE THE CAPM IN YOUR ANALYSIS TO HELP DETERMINE YOUR RECOMMENDED RETURN ON EQUITY.

A. I have included a CAPM analysis in my recommendation as it has been the Commission's recent desire to employ more than one ROE methodology. I chose to use both the CAPM and the DCF because they include inputs that allow the results to be specific to the utility industry. The CAPM is based on the performance of U.S. Treasury bonds and the performance of the market as measured through the S&P 500 and is company-specific only through the use of beta. Beta reflects a stock's volatility relative to the overall market, thereby

[20] David C. Parcell, "The Cost of Capital – A Practitioner's Guide," 2020 Edition, p. 153.

incorporating an industry-specific aspect to the CAPM, but only as a measure of how reactive the industry is compared to the market as a whole. Although changes in the utility industry are more likely to be accurately reflected in the DCF, which uses the companies' actual prices, dividends, and growth rates, I have also included the results of my CAPM analysis because changes in the market, whether as a whole or specific to the utility industry, can affect the outcome of each method in different ways. Although I have provided an analysis and included the results of the CAPM in my recommendation, it does have several disadvantages that should be considered.

Q. EXPLAIN THE DISADVANTAGES OF THE CAPM.

A. The CAPM, and the RP method by virtue of its similarities to the CAPM, give results that indicate to an investor what the equity cost rate should be if current economic and regulatory conditions are the same as those present during the historical period in which the risk premiums were determined. This is because beta, which is the only company-specific variable in the CAPM model, measures the *historical* volatility of a stock compared to the *historical* overall market return. Reliance on historical values is especially problematic now given the recent events that have impacted economic conditions. Although the CAPM and RP results can be useful to investors in making rational buy and sell decisions within their portfolios, the DCF method is the superior method for determining the rate of return for the current economic market and measuring the cost of equity directly.

The CAPM, and similarly the RP method, are less reliable indicators because they measure the cost of equity indirectly and risk premiums vary depending on the debt and equity being compared. Additionally, regulators can never be certain that economic and regulatory conditions underlying the historical period during which the risk premiums were calculated are the same today or will be the same in the future.

Q. IS THERE ANY ACADEMIC EVIDENCE THAT QUESTIONS THE CREDIBILITY OF THE CAPM MODEL?

A. Yes. An article, "Market Place; A Study Shakes Confidence in the Volatile-Stock Theory," which appeared in the *New York Times* on February 18, 1992, summarized a CAPM study conducted by professors Eugene F. Fama and Kenneth R. French.[21] Their study examined the importance of beta, CAPM's risk factor, in explaining returns on common stock. In CAPM theory, a stock with a higher beta should have a higher expected return. However, they found that the model did not do well in predicting actual returns and suggested the use of more elaborate multi-factor models.

A more recent article, "The Capital Asset Pricing Model: Theory and Evidence," which appeared in the *Journal of Economic Perspectives,* states that "the attraction of the CAPM is that it offers powerful and intuitively pleasing

[21] Berg, Eric N. "Market Place; A Study Shakes Confidence in the Volatile-Stock Theory," *The New York Times*, February 18, 1992, *nytimes.com*, March 23, 2016.

predictions about how to measure risk and the relation between expected return and risk. Unfortunately, the empirical record of the model is poor - poor enough to invalidate the way it is used in applications."[22]

Q. PLEASE EXPLAIN WHY YOU HAVE CHOSEN TO EXCLUDE THE RP METHOD FROM YOUR ANALYSIS.

A. The RP method is excluded because it is a simplified version of the CAPM and is subject to the same faults explained above. The RP method has a number of underlying assumptions and the most critical one, as well as the most disputed one, is the assumption that the equity risk premium is constant over the time.[23] More importantly, unlike the CAPM, the RP method does not recognize company-specific risk through beta.

Q. EXPLAIN WHY YOU HAVE CHOSEN TO EXCLUDE THE CE METHOD IN YOUR ANALYSIS.

A. The CE method is excluded because the choice of which companies are comparable is highly subjective, and it is debatable whether historic accounting values are representative of the future. Moreover, its historical usage in this regulatory forum has been minimal.

[22] Fama, Eugene F. and French, Kenneth R., "The Capital Asset Pricing Model: Theory and Evidence." *Journal of Economic Perspectives* (2004): Volume 18, Number 3, pp. 25-46.

[23] David C. Parcell, "The Cost of Capital – A Practitioner's Guide," 2020 Edition, pp. 167-168.

SUMMARY OF THE COMPANY'S RESULTS

Q. WHAT ARE THE RESULTS OF THE COMPANY'S COST OF EQUITY ANALYSIS?

A. Mr. Nowak used the DCF, the CAPM, and the Bond Yield Plus Risk Premium (BYPRP) methods in analyzing the Company's cost of equity. Mr. Nowak applied these methods using his proxy group of regulated natural gas utilities. He then listed the median and mean results for each method, as well as the average of the median results and the average of the mean results. Finally, Mr. Nowak opines that the cost of equity should be increased by 25 basis points to recognize NFG's management performance. Ultimately, Mr. Nowak's models determined a cost of equity range of 10.30% to 11.30% and opined that a cost of equity of 11.25% is warranted.[24]

I&E RECOMMENDATION

Q. WHAT IS YOUR RECOMMENDED COST OF COMMON EQUITY FOR THE COMPANY?

A. Based upon my analysis, I recommend a cost of common equity of 9.81%.[25]

[24] NFG Statement No. 10, p. 3, line 8 through p. 4, line 10.
[25] I&E Exhibit No. 2, Schedule 1.

Q. WHAT IS THE BASIS FOR YOUR RECOMMENDATION?

A. As thoroughly explained above and discussed in further detail below, my recommendation is based on the use of the DCF, two versions of the CAPM, and the recent average national authorized return on equity for gas distribution companies.

Discounted Cash Flow

Q. PLEASE EXPLAIN YOUR DCF ANALYSIS.

A. My analysis employs the constant growth DCF model as portrayed in the following formula:

$$K = D_1/P_0 + g$$

Where:

K	=	Cost of equity
D_1	=	Dividend expected during the year
P_0	=	Current price of the stock
g	=	Expected growth rate

When a forecast of D_1 is not available, D_0 (the current dividend) must be adjusted by one half of the expected growth rate to account for changes in the dividend paid in period one. As forecasts for each company in my proxy group were available from Value Line, no dividends were adjusted for the purpose of my analysis.

Q. PLEASE EXPLAIN HOW YOU DEVELOPED THE DIVIDEND YIELDS USED IN YOUR DCF ANALYSIS.

A. A representative dividend yield must be calculated over a time frame that avoids the problems of both short-term anomalies and stale data series. For my DCF analysis, the dividend yield calculation places equal emphasis on the most recent spot and the 52-week average dividend yields. The following table summarizes my dividend yield computations for the proxy group:[26]

Proxy Group Dividend Yields	
Spot	3.07%
52-week Average	3.37%
Average	**3.22%**

Q. WHAT INFORMATION DID YOU RELY UPON TO DETERMINE YOUR EXPECTED GROWTH RATE?

A. I have used five-year earnings per share projected growth rate estimates from S&P, Zacks, and Value Line.

[26] I&E Exhibit No. 2, Schedule 11.

Q. WHAT WERE THE RESULTS OF YOUR FORECASTED EARNINGS GROWTH RATES?

A. The expected average growth rates for my proxy group ranged from 5.75% to 8.08% with an overall average of 7.25%.[27]

Q. WHAT IS THE RESULT OF YOUR DCF ANALYSIS BASED ON YOUR RECOMMENDED DIVIDEND YIELD AND GROWTH RATE?

A. The results of my DCF analysis are calculated as follows:[28]

K	=	D_1/P_0	+	g
10.47%	=	3.22%	+	7.25%

<u>Capital Asset Pricing Model</u>

Q. PLEASE EXPLAIN YOUR CAPM ANALYSIS.

A. My analysis employs the traditional CAPM as portrayed in the following formula:

$$K = R_f + \beta(R_m - R_f)$$

Where:

K = Cost of equity

R_f = Risk-free rate of return

[27] I&E Exhibit No. 2, Schedule 12.
[28] I&E Exhibit No. 2, Schedule 13.

R_m	=	Expected rate of return on the overall stock market
β	=	Beta measures the systematic risk of an asset
$R_m - R_f$	=	Equity Risk Premium (ERP)

Q. WHAT IS BETA AS EMPLOYED IN YOUR CAPM ANALYSIS?

A. Beta is a measure of the systematic risk of a stock in relation to the rest of the stock market. A stock's beta is estimated by calculating the linear regression of a stock's return against the return on the overall stock market. The beta of a stock with a price pattern identical to that of the overall stock market will equal one. A stock with a price movement that is greater than the overall stock market will have a beta that is greater than one and would be described as having more investment risk than the market. Conversely, a stock with a price movement that is less than the overall stock market will have a beta of less than one and would be described as having less investment risk than the overall stock market.

Q. HOW DID YOU DETERMINE BETA FOR YOUR CAPM ANALYSIS?

A. In estimating an equity cost rate for my proxy group companies, I used the average of the betas for the companies as provided in the Value Line Investment Survey. The average beta for my proxy group is 0.78.[29]

[29] I&E Exhibit No. 2, Schedule 14.

Q. WHAT RISK-FREE RATE OF RETURN HAVE YOU USED FOR YOUR CAPM ANALYSIS?

A. I used the risk-free rate of return (R_f) from the projected yield on 10-year Treasury Notes. While the yield on the short-term T-Bill is a more theoretically correct parameter to represent a risk-free rate of return, it can be extremely volatile. The volatility of short-term T-Bills is directly influenced by Federal Reserve policy. At the other extreme, the 30-year Treasury Bond exhibits more stability but is not risk-free. Long-term Treasury Bonds have substantial maturity risk associated with market risk and the risk of unexpected inflation. Long-term treasuries normally offer higher yields to compensate investors for these risks. As a result, I used the yield on the 10-year Treasury Note because it mitigates the shortcomings of the other two alternatives. Additionally, the Commission has historically agreed with I&E and recognized the 10-year Treasury Note as the superior measure of the risk-free rate of return.[30]

The forecasted yield on the 10-year Treasury Note, as seen in Blue Chip Financial Forecasts, remains steady at 4.20% from the second quarter of 2026 to the second quarter of 2027, and it is forecasted to remain at 4.20% from 2027-

[30] *Pa. PUC v. UGI Utilities, Inc. – Electric Division*, Docket No. R-2017-2640058 (Order Entered October 25, 2018). *See generally* Disposition of Capital Asset Pricing Model (CAPM), p. 99; *Pa. PUC v. Aqua Pennsylvania, Inc.*, Docket Nos. R-2021-3027385 & R-2021-3027386, p. 154 (Order Entered May 16, 2022); *Pa. PUC v. Columbia Water Company*, Docket No. R-2023-3040258 (Order Entered January 18, 2024). *See generally* Disposition of Cost of Common Equity, pp. 107-108; *Pa. PUC v. Pennsylvania-American Water Company*, Docket Nos. R-2023-3043189 & R-2023-3043190 (Order Entered July 22, 2024). *See generally* Disposition of Capital Asset Pricing Model (CAPM), pp. 171-172.

2031. For my CAPM analysis, I used 4.20%, which is the average of all the yield forecasts I observed.[31]

Q. HOW DID YOU DETERMINE THE RETURN ON THE OVERALL STOCK MARKET IN YOUR CAPM ANALYSIS?

A. To arrive at a representative expected return on the overall stock market, I observed Value Line's 1700 stocks and the historical returns of the S&P 500. Value Line expects its universe of approximately 1700 stocks to have an average yearly return of 10.78% over the next three to five years based on a forecasted dividend yield of 2.00% and a yearly index appreciation of 40%. The S&P 500 Index has had an average return of 12.35% over the past 100 years (1926-2025).[32] I have averaged these two figures, which results in an estimated market return of 11.57%.[33]

Q. WHAT IS THE COST OF EQUITY RESULT FROM YOUR CALCULATED CAPM ANALYSIS?

A. The result of my analysis is as follows:[34]

K	=	R_f	+	$\beta (R_m - R_f)$
9.95%	=	4.20%	+	0.78 (11.57% - 4.20%)

[31] I&E Exhibit No. 2, Schedule 15.
[32] I&E Exhibit No. 2, Schedule 16.
[33] I&E Exhibit No. 2, Schedule 17.
[34] I&E Exhibit No. 2, Schedule 18.

Q. HAVE YOU PROVIDED AN ADDITIONAL CAPM ANALYSIS?

A. Yes. I have provided an additional CAPM analysis using Kroll's (formerly Duff & Phelps) recommended U.S. Equity Risk Premium (ERP) paired with Kroll's suggested use of the 20-year U.S. Treasury yield. Kroll is a trusted and publicly available source that bases their recommended ERP on current and forecasted economic and financial market conditions.

Q. WHAT IS KROLL'S CURRENT RECOMMENDED ERP?

A. As of January 30, 2026, Kroll recommends an ERP of 5.00%.[35]

Q. WHAT IS THE CURRENT 20-YEAR U.S. TREASURY YIELD?

A. As of February 25, 2026, the 20-Year U.S. Treasury yield was 4.65%.[36]

Q. WHAT IS THE COST OF EQUITY RESULT FROM YOUR CAPM ANALYSIS USING KROLL'S RECOMMENDED ERP AND THE SUGGESTED 20-YEAR U.S. TREASURY YIELD?

A. The result of my analysis is as follows:[37]

K	=	R_f	+	β (ERP)
8.55%	=	4.65%	+	0.78 (5.00%)

[35] I&E Exhibit No. 2, Schedule 19.
[36] I&E Exhibit No. 2, Schedule 20.
[37] I&E Exhibit No. 2, Schedule 18.

Q. WHAT IS THE RESULT OF YOUR CAPM ANALYSIS BASED ON THE AVERAGE OF YOUR CALCULATIONS AND USING KROLL'S RECOMMENDED ERP AND SUGGESTED 20-YEAR TREASURY YIELD?

A. The average of my CAPM analyses is 9.25% ((9.95% + 8.55%) ÷ 2).

Q. DO YOU HAVE ANY ADDITIONAL COMMENTS REGARDING YOUR CAPM ANALYSIS?

A. Yes. As discussed earlier in my testimony, and as I&E has historically reasoned, the CAPM inputs are highly subjective, and other than beta, not company or industry specific. So, while I believe the DCF is the most reliable of the cost of equity models, I have provided a CAPM analysis as it does provide some value and it has been recent Commission precedent to rely on a combination of both the DCF and CAPM models.

<u>National Average Authorized ROE</u>

Q. WHAT IS THE RECENT NATIONAL AVERAGE AUTHORIZED ROE FOR GAS DISTRIBUTION UTILITIES ACROSS THE U.S.?

A. Data provided by S&P Global Market Intelligence shows the National average authorized ROE for gas distribution companies across the U.S. was 9.70% for cases decided in 2025 through March 11, 2026.[38]

[38] I&E Exhibit No. 2, Schedule 7.

Q. PLEASE EXPLAIN WHY YOU HAVE INCORPORATED RECENT NATIONAL AUTHORIZED EQUITY RETURNS FOR GAS UTILITIES INTO YOUR ROE ANALYSIS.

A. This information complies with the principle derived from the *Hope* and *Bluefield* cases, previously discussed in this testimony, that a utility is entitled to a return similar to that being earned by other enterprises with corresponding risks and uncertainties, but not as high as those earned by highly profitable or speculative ventures. Therefore, it is reasonable and logical to include in my recommendation the authorized returns of the Company's peers in recently completed rate cases across the country.

Notably, I&E Exhibit No. 2, Schedule 7, cited above, also illustrates the differences in the Company's requested ROE and equity ratio as compared to gas distribution utilities in rate proceedings across the U.S. My recommended ROE of 9.81% and equity ratio of 55% for the Company in this case are comparable, yet higher than the national average authorizations of 9.70% and 51.62% respectively.

CRITIQUE OF MR. NOWAK'S PROPOSED COST OF EQUITY

Q. DO YOU AGREE WITH MR. NOWAK'S 11.25% PROPOSED COST OF EQUITY?

A. No. I disagree with Mr. Nowak's proposed cost of equity analysis for several reasons. First, I disagree with the results of his DCF analysis. Second, I disagree

with the weight given to the results of his Bond Yield Plus Risk Premium (BYPRP) analysis in his recommendation. Third, I disagree with his reliance on the 30-year Treasury Bond for his risk-free rate in his CAPM analysis. Fourth, I disagree with Mr. Nowak's claims regarding the current capital market environment. Fifth, I disagree with his claim that NFG requires a higher authorized ROE due to their planned capital expenditures, their smaller comparative size, and customer concentration risk. Finally, I disagree with Mr. Nowak's assertion that NFG should be awarded an adjustment to the authorized ROE for management performance.

Mr. Nowak's DCF Analysis

Q. PLEASE EXPLAIN MR. NOWAK'S DCF ANALYSIS.

A. Mr. Nowak presents a constant growth DCF analysis, running analyses based on the average stock price from the previous 30, 90, and 180 trading days. He then creates a median, mean, mean low, and mean high results for each trading period.[39] The result of his constant growth DCF is a median of 10.70% and a mean of 11.58%.[40]

[39] NFG Statement No. 10, p. 33, ln. 1.
[40] NFG Statement No. 10, p. 4, ln. 1.

Q. DO YOU AGREE WITH MR. NOWAK'S DCF ANALYSIS?

A. No, I do not. Mr. Nowak's inclusion of SWX and SR in his proxy group has inflated the results of his DCF analysis. As shown in the table below, using Mr. Nowak's proxy group and the same projected growth rates he provided in Exhibit JCN-4, while excluding SWX and SR from the data yields a median growth rate of 7.20% and a mean growth rate of 6.99%. These results are considerably lower than his listed results, which include a median growth rate of 7.94% and a mean growth rate of 8.03%.

	Growth Rates			
	VL	S&P CIQ	Zacks	Average
ATO	8.50%	7.49%	8.00%	8.00%
NJR	6.50%	7.90%	N/A	7.20%
NI	8.00%	7.93%	7.90%	7.94%
NWN	6.50%	5.50%	N/A	6.00%
OGS	4.50%	6.66%	6.20%	5.79%
			Median	7.20%
			Mean	6.99%

Additionally, excluding SWX and SR while conducting a similar analysis of Mr. Nowak's proxy group dividend yields as shown in Exhibit JCN-4 yields the following results:

	30-day	90-day	180-day
ATO	2.28%	2.37%	2.47%
NJR	4.11%	4.08%	4.06%
NI	2.59%	2.64%	2.73%
NWN	4.16%	4.50%	4.62%
OGS	3.27%	3.42%	3.51%
Median	3.27%	3.42%	3.51%
Mean	3.28%	3.40%	3.48%
Average of Medians and Means			3.39%

Using the average of the median and mean growth rates of 7.09% ((7.20% + 6.99%) / 2) and the average of the medians and means of the 30, 90, and 180-day dividend yields (3.39%) yields a DCF result of 10.48% (7.09% + 3.39%). Had Mr. Nowak properly removed SWX and SR from his proxy group as discussed above, he would have arrived at a DCF result that is nearly identical to I&E's DCF result of 10.47%.

Bond Yield Plus Risk Premium Approach

Q. WHAT IS THE BOND YIELD PLUS RISK PREMIUM APPROACH?

A. The Bond Yield Plus Risk Premium approach is a method that relies on the theory that common stock is riskier than debt; thus, investors require a higher expected return on stocks than bonds to be properly compensated for the additional risk of holding equity as opposed to being a bondholder.

Q. DO YOU AGREE WITH MR. NOWAK'S USE OF THE BYPRP APPROACH?

A. No. Beyond my criticism of this method in the *"Common Methods"* section above, Mr. Nowak admits he is unaware of any instance in which it was relied upon by the Commission to estimate an authorized ROE.[41]

Risk-Free Rate used in the CAPM

Q. WHAT RISK-FREE RATE DOES MR. NOWAK USE IN HIS CAPM ANALYSIS?

A. Mr. Nowak used the following estimates for his expected risk-free rate: (1) the current 30-day average yield on 30-year Treasury bonds (4.66%), (2) the projected 30-year U.S. Treasury bond yield for the first quarter of 2026 through the first quarter of 2027 (4.60%), and (3) the projected 30-year Treasury yield for 2027-2031 (4.60%) in the calculation of his estimates.[42]

Q. DO YOU AGREE WITH MR. NOWAK'S USE OF THE 30-YEAR TREASURY BOND TO DETERMINE THE RISK-FREE RATE?

A. No. As discussed above, long-term Treasury Bonds have substantial maturity risk associated with the market risk and the risk of unexpected inflation and normally offer higher yields to compensate investors for these risks. Using the 10-year

[41] I&E Exhibit No. 2, Schedule 21.
[42] NFG Statement No. 10, p. 35, lines 1-10.

Treasury Note is more appropriate to balance the short-term volatility risk and the long-term inflation risk. Further, as noted above, the Commission has traditionally recognized the 10-year Treasury Note as the superior measure of the risk-free rate of return.

Capital Market Environment

Q. WHAT ARE MR. NOWAK'S CLAIMS REGARDING THE CURRENT AND PROSPECTIVE CAPTAL MARKET?

A. Mr. Nowak opines that the current capital environment is being affected by (1) the interest rate environment, (2) current and long-term inflation pressures, and (3) economic uncertainty due to geopolitical events. He opines that trends such as higher than normal inflation and the Federal Reserve's monetary policy contribute to uncertainty in the capital market conditions, and that NFG requires an increased authorized ROE in order to combat these conditions.[43]

Q. PLEASE COMMENT ON CURRENT INFLATION AND INTEREST RATE CONCERNS.

A. First, while I cannot dispute the recent economic conditions with respect to increased interest rates and government bond yields, it is important to note that all companies, including regulated utilities, are impacted by high interest rates. The Federal Reserve has cut interest rates in September, October, and December of

[43] NFG Statement No. 10, p. 11-23.

2025, and is expecting to make one more cut in 2026.[44] If the Federal Reserve decides to make interest rate cuts in the next year as projected, it would likely positively impact long-term borrowing rates in the FPFTY, when the new rates will be in effect.

With respect to inflation, per the most recent monthly Blue Chip Financial Forecasts,[45] the 2026 and 2027 inflation rates by two measures are forecasted to decline from around 3% to 2.2%as shown in the table below:

	Q1 2026	**Q2 2026**	**Q3 2026**	**Q4 2026**	**Q1 2027**	**Q2 2027**
Consumer Price Index	2.8%	2.7%	2.6%	2.5%	2.5%	2.3%
PCE Price Index	3.0%	2.6%	2.5%	2.4%	2.4%	2.2%

Inflation has trended downward closer to normal rates since the high inflation periods associated with the COVID-19 pandemic, and as shown above, is projected to continue to decline. Lastly, it is important to note that unlike unregulated companies, public utilities may file rate cases to address unforeseen or increased expenses, increases in the costs of borrowing, and equity and/or revenue shortfalls due to changes in market conditions.

[44] Federal Reserve holds interest rates steady, citing elevated economic uncertainty - CBS News https://www.cbsnews.com/news/federal-reserve-fomc-march-18-interest-rate-decision (accessed April 2, 2026).

[45] Blue Chip Financial Forecasts Vol. 45, No. 3, February 27, 2026.

Q. PLEASE COMMENT ON MR. NOWAK'S GEOPOLITICAL EVENT CONCERNS.

A. NFG faces the same exposure to these issues as all the other companies in our respective proxy groups. Investors voluntarily buy and hold shares of stocks in gas utility companies, indicating they are aware of these risks and the returns. The cost of equity I present for NFG in this proceeding is adequately measured by my proxy group and adequately compensates investors for these risks.

Capital Expenditure Program

Q. WHAT IS MR. NOWAK'S CLAIM REGARDING ADDITIONAL RISK DUE TO THE COMPANY'S CAPITAL INVESTMENT PLANS?

A. Mr. Nowak claims that NFG plans to spend approximately $185 to $205 million on capital expenditures in 2026. He also claims that NFG requires a higher authorized ROE in order to support these expenditures, as a high level of expenditures could place pressure on NFG's credit ratings which would reduce the Company's ability to secure capital at favorable terms and would potentially deter equity investors.[46]

[46] NFG Statement No. 10, p. 41-43.

Q. WHAT IS YOUR RESPONSE TO MR. NOWAK'S CLAIM REGARDING THE COMPANY'S CAPITAL EXPENDITURES?

A. Every gas utility faces the same issues of upgrading or replacing its infrastructure. As distribution costs increase, NFG, like any other regulated natural gas utility, has the option to file a base rate case at any time to address revenue inadequacy due to maintaining, expanding, and modernizing infrastructure. Base rate cases allow a utility to recover its costs and provide it with the *opportunity* to earn a reasonable return on capital investments. Additionally, the Commission offers risk reducing mechanisms such as the Distribution System Improvement Charge (DSIC) and the FPFTY to help reduce any regulatory lag in recovery of infrastructure investment or other unforeseen expenditures. It should be noted that these mechanisms were not designed to eliminate the need for periodic base rate case filings, but only to mitigate regulatory lag and support increasing infrastructure replacement needs.

Size Effect

Q. PLEASE SUMMARIZE MR. NOWAK'S DISCUSSION REGARDING THE COMPANY'S SIZE.

A. It is important to note that Mr. Nowak has not added any basis points for a "size adjustment" to his calculated return on equity; rather he offers the discussion as a consideration in determining an appropriate return on equity. Mr. Nowak opines that smaller companies are less able to cope with significant events affecting sales,

revenues, or earnings, and that the loss of large customers can disproportionately affect NFG compared to the proxy group. Ultimately, he opines that NFG's smaller size increases its financial and business risks, although, again, he does not make an explicit adjustment to his requested ROE for size.[47]

Q. DO YOU AGREE WITH MR. NOWAK'S CONSIDERATION OF THE COMPANY'S SIZE?

A. No. Consideration of the Company's size in the calculation of the return on equity is unnecessary because any expense impact resulting from the lesser buying power of a smaller utility is reflected in the revenue requirement and the dollar-for-dollar recovery that applies to expenses. To apply an additional size adjustment to a smaller regulated utility would only duplicate the burden to ratepayers.

Q. IS THERE ACADEMIC EVIDENCE THAT SUPPORTS YOUR CONCLUSION THAT THE SIZE ADJUSTMENT FOR RISK IS NOT APPLICABLE TO UTILITY COMPANIES?

A. Yes. In the article "Utility Stocks and the Size Effect: An Empirical Analysis," Dr. Annie Wong concludes:

> The objective of this study is to examine if the size effect exists in the utility industry. After controlling for equity values, there is some weak evidence that firm size is a missing factor from the CAPM for the industrial but not for utility stocks. This implies that although the size phenomenon has been strongly

[47] NFG Statement No. 10, p. 44-47.

> documented for the industriales, the findings suggest that there is no need to adjust for the firm size in utility rate regulation.[48]

The Company has presented no evidence to support application of a non-utility study regarding a size adjustment for risk to a utility setting. Absent any credible article to refute Dr. Wong's findings, Mr. Nowak's discussion of a size adjustment as it could be applied to the Company should be disregarded. Furthermore, the Commission has rejected the application of a size adjustment to the cost of equity calculation.[49] Finally, when asked, Mr. Nowak indicated he was unaware of any "large customer" accounts that NFG has lost in the past three years.[50]

Customer Concentration Risk

Q. WHAT IS MR. NOWAK'S CLAIM REGARDING ADDITIONAL RISK DUE TO THE COMPANY'S CUSTOMER CONCENTRATION RISK?

A. Mr. Nowak claims that NFG faces risks related to economic changes that can influence consumer demand, and that the Company is exposed to increased risk due to the potential loss of revenue that comes with the loss of a customer. He also opines that economic downturn can reduce consumer demand for manufactured products, which in turn reduces industrial customers' demands for natural gas supplied by the Company.[51]

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[48] Dr. Annie Wong, "Utility Stocks and the Size Effect: An Empirical Analysis," *Journal of Midwest Finance Association* 1993, pp. 95-101.

[49] *Pa. PUC v. UGI Utilities, Inc. – Electric Division*, Docket No. R-2017-2640058 (Order Entered October 25, 2018). *See generally* Disposition of Capital Asset Pricing Model (CAPM), p. 100.

[50] I&E Exhibit No. 2, Schedule 22.

[51] NFG Statement No. 10, p. 47-52.

Q. WHAT IS YOUR RESPONSE TO MR. NOWAK'S CLAIM REGARDING THE COMPANY'S CUSTOMER CONCENTRATION?

A. Every gas utility faces the same issues of changing economic and market conditions. As stated above, NFG, like any other regulated gas utility, has the option to file a base rate case at any time to address revenue inadequacy due to loss of customers or subsequent loss of revenues. Additionally, as previously mentioned, Mr. Nowak indicated he was unaware of the loss of any large customers in recent years.

Management Performance

Q. DISCUSS THE COMPANY'S CLAIMS SPECIFIC TO MANAGEMENT PERFORMANCE.

A. Mr. Nowak proposes that 25 basis points be added to the calculated cost of equity in recognition of the Company's management performance. He primarily relies upon the direct testimony of Company witness Rebecca E. Hillery, NFG's Managing Director of Rates and Regulatory Affairs, (NFG Statement No. 1) to support the consideration of additional basis points for NFG's "exemplary" management performance.[52]

[52] NFG Statement No. 10, p. 4, lines 6-10.

Q. WHAT INFORMATION DOES MS. HILLERY PROVIDE TO SUPPORT THE COMPANY'S MANAGEMENT PERFORMANCE CLAIMS?

A. Ms. Hillery argues that NFG should be authorized additional basis points to the determined return on common equity claiming that the Company has demonstrated excellence in several areas including safety, quality customer service, information technology, affordability and operational efficiencies, customer payment assistance, and community engagement.[53]

Q. DO YOU AGREE THAT THE COMPANY'S MANAGEMENT PERFORMANCE SHOULD BE CONSIDERED WHEN DETERMINING THE COMPANY'S RETURN ON EQUITY?

A. No. First, many of the topics presented by the Company witnesses fall within the categories of reliability, customer satisfaction, and safety that are required of every public utility company under 66 Pa C.S.A. §1501. Additionally, the Company passes capital expenditures to its ratepayers via base rates, or it can utilize the DSIC for capital expenditure recovery. Further, if the Company is effective at controlling operating and maintenance costs, those savings should flow through to ratepayers and/or investors. These savings would likely be offset by the addition of basis points for management performance, as ratepayers would have to fund the additional costs. This defeats the purpose of any cost cutting measures to benefit ratepayers.

[53] NFG Statement No. 1, p. 20, lines 7-16.

Q. ARE YOU AWARE OF ANY COMPANIES THAT HAVE RECEIVED ADDITIONAL BASIS POINTS IN RECOGNITION OF MANAGEMENT PERFORMANCE?

A. Yes. In its 2021 base rate case, Aqua was awarded an addition of 25 basis points by the Commission for its management performance efforts.[54] However, it is important to recognize that this addition was based specifically on Aqua rescuing troubled water and wastewater systems at the Commission's request. The Commission stated: [55]

> We specifically recognize Aqua's efforts and willingness to quickly provide emergency aid to various water and wastewater systems that needed substantial improvement. Aqua has often provided this emergency aid on short notice and at the request of the Commission or other parties to protect the public from egregious health and safety threats and to protect the Commonwealth's drinking water resources from catastrophic damage.

Q. DOES THE COMMISSION'S PAST ISSUANCE OF ADDITIONAL EQUITY POINTS TO RECOGNIZE MANAGEMENT PERFORMANCE MEAN THAT NFG SHOULD ALSO RECEIVE AN ADJUSTED RETURN ON EQUITY?

A. No. The issuance of equity points to recognize management performance should be done on a case-by-case basis. The situation in the Aqua proceeding as

[54] *Pa. PUC v. Aqua Pennsylvania, Inc.,* Docket Nos. R-2021-3027385 & R-2021-3027386, pp. 168-173 (Order entered May 16, 2022).

[55] *Pa. PUC v. Aqua Pennsylvania, Inc.,* Docket Nos. R-2021-3027385 & R-2021-3027386, p. 169 (Order entered May 16, 2022).

discussed above was very specific to Aqua rescuing troubled water and wastewater systems and preventing health and safety concerns regarding drinking water. This scenario does not apply to NFG.

Q. BASED ON THE COMPANY'S FILED RATE BASE AND CLAIMED CAPITAL STRUCTURE, WHAT IS THE VALUE OF AN ADDITIONAL 25 BASIS POINTS FOR THE CONSIDERATION OF MANAGEMENT PERFORMANCE TO THE COST OF EQUITY?

A. The example below illustrates the impact of 25 additional basis points for the consideration of management performance to the Company's claimed cost of equity:

National Fuel Gas Distribution Corporation	
Claimed Equity Percentage of Capital Structure	56.40%
Additional Basis Points to the Calculated Cost of Equity for "Management Effectiveness"	0.25%
Claimed Rate Base*	$571,582,000
Impact Prior to Gross Up (0.5640 x 0.0025 x $571,582,000)	$805,931
Gross Revenue Conversion Factor**	1.3899
Total Impact ($805,931 x 1.3899)	**$1,120,163**

*NFG Exhibit A, Schedule A-1, Line 9.
**NFG Exhibit A, Schedule A-1, Line 25.

In this example, an addition of 25 basis points to the cost of equity in consideration of management performance would force ratepayers to fund an unwarranted additional amount of $1,120,163 annually to cover the increase of the inflated rate of return along with the associated impact resulting from increases to income taxes, uncollectibles, and assessments.

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE CONSIDERATION OF ADDITIONAL BASIS POINTS FOR THE COMPANY'S MANAGEMENT PERFORMANCE?

A. I am aware that under 66 Pa C.S.A. §523 the Commission has authority to *consider* a utility's performance, however, it is not mandatory that the Commission grant additional basis points to the ROE. Ultimately, as alluded to above, true strong management performance is earning a higher return through efficient use of resources and cost cutting measures. The greater net income resulting from cost savings and true efficiency in management and operations is available to be passed on to both ratepayers and shareholders. I do not believe that NFG or any utility should be gifted additional basis points for doing what they are required to do to provide adequate, efficient, safe, and reasonable service under 66 Pa C.S.A. §1501. For these reasons, I recommend that any addition of basis points to the cost of equity for management performance be disallowed.

OVERALL RATE OF RETURN RECOMMENDATION

Q. WHAT IS THE COMPANY'S PROPOSED COST OF EQUITY AND OVERALL RATE OF RETURN?

A. The Company recommends a cost of equity of 11.25% and an overall rate of return of 8.78%.[56]

Q. WHAT IS I&E'S RECOMMENDED COST OF EQUITY AND OVERALL RATE OF RETURN?

A. I&E Exhibit No. 2, Schedule 1, shows the calculation of an appropriate cost of equity for the Company to be 9.81% with an overall rate of return of 7.91%. The difference in NFG's requested ROE of 11.25% and I&E's recommended ROE of 9.81% is 1.44%, or 144 basis points.

Q. BASED ON THE COMPANY'S FILED RATE BASE AND CLAIMED CAPITAL STRUCTURE, WHAT IS THE VALUE OF AN ADDITIONAL 144 BASIS POINTS TO THE COST OF EQUITY?

A. The example below illustrates the impact of 144 additional basis points to the Company's cost of equity:

[56] NFG Statement No. 10, p. 55, lines 17-18.

National Fuel Gas Distribution Corporation	
Claimed Equity Percentage of Capital Structure	56.40%
Difference in Return on Equity between I&E's Recommendation and NFG's Requested ROE (11.25% - 9.81% = 1.44%)	1.44%
Claimed Rate Base*	$571,582,000
Impact Prior to Gross Up (0.5640 x 0.0144 x $571,582,000)	$4,642,160
Gross Revenue Conversion Factor**	1.3899
Total Impact ($571,582,000 x 1.3899)	**$6,452,139**

*NFG Exhibit A, Schedule A-1, Line 9.
**NFG Exhibit A, Schedule A-1, Line 25.

In this example, an addition of 144 basis points to the cost of equity would force ratepayers to fund an unwarranted additional amount of $6,452,139.

Q. DO YOU HAVE ANY FINAL COMMENTS REGARDING THE COMPANY'S PROPOSED RETURN ON EQUITY?

A. Yes. First, to reiterate, the data taken from S&P Global Market Intelligence, as cited above in the "*Capital Structure*" section, illustrates that the average authorized return on equity decided between January 2025 and March 2026 was 9.70%, and the average authorized equity percentage during that same span was

51.62%.[57] NFG's recommendations far exceed these averages, and the ROE recommended by I&E of 9.81% is still above the national average during the aforementioned span.

Second, when asked, Mr. Nowak indicated he was unaware if any natural gas distribution utilities in the contiguous United States were granted a Commission authorized return of 11.25% or higher cost of common equity in the past two years.[58]

Third, as cited above, the Commission has recently commented on the equity heavy capital structure of other utility companies, and specifically asked that NFG's capital structure be subject to a careful evaluation.

Finally, I believe it is important to consider the impact of what the Company's excessive return on equity request of 11.25% would have on rates. Any additional basis points beyond the I&E recommended ROE of 9.81% would be excessive and would put an enormous burden on ratepayers during these tough economic times.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes. However, omission of any specific topic does not constitute I&E's agreement. Further, I reserve the right to supplement my testimony or to revise recommendations if additional issues or facts arise during this proceeding.

[57] I&E Exhibit No. 2, Schedule 7.
[58] I&E Exhibit No. 2, Schedule 23.

APPENDIX A
Drew Breuning
Professional and Educational Experience

Professional Experience

October 2024 – Present
Fixed Utility Financial Analyst
Pennsylvania Public Utility Commission, Harrisburg, Pennsylvania
Bureau of Investigation and Enforcement

Education and Training

Shippensburg University of Pennsylvania, Shippensburg, Pennsylvania
Bachelor of Science, Business Administration, Concentration in Finance, 2022

Investment Management Program, Shippensburg University, 2022

Utility Specific Training/Conferences:

SURFA Annual Financial Forum – Charlotte, NC – 2025

Testimony Submitted

I have testified and/or submitted testimony in the following proceedings:

- Docket No. R-2025-3059523 – UGI Utilities, Inc. – Gas Division
- Docket No. R-2025-3057164 – PPL Electric Utilities Corporation
- Docket No. R-2025-3053442 – The York Water Company
- Docket No. R-2024-3052716 – UGI Utilities, Inc. – Gas Division

I&E Statement No. 2-SR
Witness: Drew Breuning

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

Docket No. R-2025-3059428

Surrebuttal Testimony

of

Drew Breuning

Bureau of Investigation & Enforcement

Concerning:

Rate of Return

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INTRODUCTION OF WITNESS

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Drew Breuning. My business address is Pennsylvania Public Utility Commission, Commonwealth Keystone Building, 400 North Street, Harrisburg, PA 17120.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by the Pennsylvania Public Utility Commission (Commission) in the Bureau of Investigation & Enforcement (I&E) as a Fixed Utility Financial Analyst.

Q. ARE YOU THE SAME DREW BREUNING WHO IS RESPONSIBLE FOR THE DIRECT TESTIMONY CONTAINED IN I&E STATEMENT NO. 2 AND THE SCHEDULES IN I&E EXHIBIT NO. 2?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. The purpose of my surrebuttal testimony is to respond to the rebuttal testimony of National Fuel Gas Distribution Corporation (NFG or Company) witness Joshua C.

Nowak regarding rate of return topics including the cost of common equity and the overall fair rate of return, which will be applied to the Company's rate base.[1]

The absence of any comments or responses to statements or topics addressed in NFG's rebuttal testimony concerning the cost of common equity or the overall rate of return does not imply my acceptance or support of their positions in this proceeding.

Q. DOES YOUR SURREBUTTAL TESTIMONY INCLUDE AN EXHIBIT?

A. No. However, I refer to my direct testimony[2] and schedules contained in the exhibit[3] supporting my direct testimony where necessary.

Q. WHAT WAS YOUR ORIGINAL OVERALL RATE OF RETURN RECOMMENDATION IN DIRECT TESTIMONY?

A. I recommended the following rate of return for the Company:[4]

I&E
Summary of Cost of Capital

Type of Capital	Ratio	Cost Rate	Weighted Cost
National Fuel Gas Distribution Corporation			
Long-Term Debt	45.00%	5.58%	2.51%
Common Equity	55.00%	9.81%	5.40%
Total	100.00%		7.91%

[1] NFG Statement No. 10-R.
[2] I&E Statement No. 2.
[3] I&E Exhibit No. 2.
[4] I&E Statement No. 2, pp. 6-7 and I&E Exhibit No. 2, Schedule 1.

SUMMARY OF MR. NOWAK'S REBUTTAL TESTIMONY

Q. SUMMARIZE MR. NOWAK'S RESPONSE IN REBUTTAL TESTIMONY TO YOUR RATE OF RETURN RECOMMENDATIONS.

A. First, Mr. Nowak provides an updated analysis from what he employed in his direct testimony. Mr. Nowak disputes my recommendations regarding an overall fair rate of return. Then, he disagrees with my use of a hypothetical capital structure that limited the authorized equity ratio to 55%. Mr. Nowak also continues to utilize a different proxy group than I do, as a result of differences in our proxy group selection criteria. While he does not offer specific criticisms regarding my DCF analysis, he criticizes my application of the Capital Asset Pricing Model (CAPM), claiming that I have incorrectly relied on the 10-year Treasury Bond for my risk-free rate and inappropriately used a Kroll-based CAPM analysis in the calculation of my recommendation. Mr. Nowak also disagrees with my dismissal of the Risk Premium (RP) model. Finally, Mr. Nowak comments on my disagreement regarding several aspects of NFG's risk.

MR. NOWAK'S UPDATED ANALYSIS

Q. DID THE COMPANY UPDATE ITS RATE OF RETURN CLAIM?

A. Yes. Mr. Nowak provides an updated cost of equity analysis using market data as of March 31, 2026, because his original analysis was performed using data as of

November 28, 2025.[5] While the results produced by his updated analysis indicate a small increase to his average three-model ROE result, Mr. Nowak continues to recommend a "base" return on equity of 11.00% as he did in his direct testimony. However, Mr. Nowak has noted that NFG has removed their request for a 25-basis point upward adjustment to the requested ROE for management efficiency, citing customer affordability and inflationary pressures.[6]

NATIONAL AVERAGE AUTHORIZED ROEs

Q. SUMMARIZE MR. NOWAK'S CRITICISM OF YOUR USE OF NATIONAL AVERAGE AUTHORIZED ROEs IN DETERMINING YOUR RECOMMENED RETURN ON EQUITY FOR THE COMPANY.

A. While Mr. Nowak agrees that authorized returns can be valuable, he claims that the use of a national average authorized ROEs as part of my recommendation does not factor in changing economic and financial conditions over time. He also opines that my use of recent historical returns does not account for forward-looking capital market expectations, and that market conditions change over time.[7]

[5] NFG Statement No. 10-R, p. 11, line 7 through p. 12, line 3.
[6] NFG Statement No. 10-R, p. 5, ln. 18 through p. 6, ln. 3 and p. 22, lines 13-16.
[7] NFG Statement No. 10-R, pp. 9-10.

Q. WHAT IS YOUR RESPONSE TO MR. NOWAK'S CRITICISM REGARDING YOUR USE OF NATIONAL AVERAGE AUTHORIZED ROEs IN DETERMINING AN APPROPRIATE ROE IN THIS PROCEEDING.

A. While I agree with Mr. Nowak that historical returns aren't entirely predictive of required future returns, I continue to believe it is reasonable and logical to consider authorized returns of comparable companies in the natural gas distribution industry from across the nation. Additionally, I believe the current economic conditions are similar enough to the past approximate year and half, which is the period that encompasses the data I employed.[8] Finally, as stated in my direct testimony, this information complies with the principle derived from the *Hope* and *Bluefield* cases,[9] that a utility is entitled to a return similar to that being earned by other enterprises with corresponding risks and uncertainties, but not as high as those earned by highly profitable or speculative ventures.[10]

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[8] I&E Exhibit No. 2, Schedule 7.

[9] *See Bluefield Water Works & Improvements Co. v. Public Service Comm. of West Virginia,* 262 U.S. 679,692-93 (1923), and the *FPC v. Hope Natural Gas Co.,* 320 U.S. 591, 603 (1944).

[10] I&E Statement No. 2, pp. 36-37.

CAPITAL STRUCTURE

Q. SUMMARIZE MR. NOWAK'S REBUTTAL TESTIMONY REGARDING NFG'S CAPITAL STRUCTURE.

A. Mr. Nowak opines that my hypothetical capital structure of 55% equity and 45% debt is inappropriate and should not be considered in this proceeding. He disagrees with my assertion that NFG's proposed capital structure is unreasonable for ratemaking purposes, stating that his proposed 56.4% equity ratio falls within the range of my proxy group's equity ratios. Additionally, Mr. Nowak opines that my use of Value Line's projected capital structures is flawed because those projections are also based on holding companies.[11]

Q. WHAT IS YOUR RESPONSE TO MR. NOWAK'S COMMENTS REGARDING NFG'S CAPITAL STRUCTURE?

A. As stated in my direct testimony, it is my opinion that NFG's actual capital structure of 56.4% common equity and 43.6% long-term debt is unreasonable for ratemaking purposes due to it being significantly higher than both my proxy group's average equity percentage of 48.70% and an optimal 50/50 capital structure.[12] Additionally, in Mr. Nowak's own rebuttal testimony, he states that my 55% equity recommendation is, "not, in itself, unreasonable."[13] Given this statement, in addition to Commissioner Barrow's comments outlined in my direct

[11] NFG Statement 10-R, pp. 12-21.
[12] I&E Exhibit No. 2, Schedule 4.
[13] NFG Statement 10-R, p. 16, line 7.

testimony[14] regarding consideration of the financial impact to customers in relation to equity heavy capital structures, as well as affordability concerns voiced by Governor Shapiro,[15] I continue to believe it is necessary to limit NFG's (or any regulated utility's) capital structure to 55% equity to balance the interests of all parties without overburdening ratepayers. I would also note that NFG is clearly aware of the current concerns regarding customer affordability, which they demonstrate by removing their 25-basis point adjustment to the requested ROE for management efficiency.[16] A reduction in the authorized equity percentage would greatly help customer affordability in these difficult economic times.

Q. PLEASE RESPOND TO MR. NOWAK'S CRITICISMS REGARDING THE USE OF PARENT AND HOLDING COMPANY VS. OPERATING COMPANY CAPITAL STRUCTURE DATA.

A. Information used to determine a fair return on equity from commonly used sources such as Zacks, S&P, Value Line, etc., are all based on the publicly traded parent/holding companies. In fact, Mr. Nowak himself uses data pulled from these sources.[17] These sources have historically been common practice to use by almost all parties who perform rate of return and return on equity analyses in base rate proceedings. The Commission generally relies upon I&E methodologies, as cited

[14] I&E Statement No. 2, pp. 15-16.
[15] I&E Exhibit No. 1-SR, Schedule 2, pp. 1-4.
[16] NFG Statement No. 10-R, pp. 5-6.
[17] National Fuel Exhibit JCN-2R.

at various points in my direct testimony as well as this surrebuttal testimony, which are crafted from data sourced from parent companies.

Further, several components involved in the recommendations of both myself and Mr. Nowak, such as the cost of long-term debt, stock price, projected dividends, and beta, are all sourced from the holding company level. It seems illogical to use financial data from holding companies for every other variable of the analysis, then use data from subsidiary/operating companies to determine an appropriate capital structure. For the reasons listed above, I stand by my decision to use data from the holding company level in the calculation of my recommended return on equity and capital structure.

Lastly, regarding Columbia Gas' recent requested equity ratio of 54.4%, which was adopted by the Commission, Commissioner Barrow stated, "I agree with the OCA that the discrepancy between Columbia Gas' capital structure and the proxy group necessitates an adjustment to the Company's capital structure since Columbia Gas' equity profile has less financial risk than the proxy group. A 50/50 capital structure in this case is equal to the proxy group's average capital structure."[18] Therefore, I respectfully disagree with Mr. Nowak's opinion that a hypothetical capital structure is not appropriate in this proceeding.

[18] I&E Exhibit No. 2, Schedule 6.

PROXY GROUP COMPOSITION

Q. SUMMARIZE MR. NOWAK'S REBUTTAL TESTIMONY REGARDING THE COMPOSITION OF OUR RESPECTIVE PROXY GROUPS.

A. Mr. Nowak opines that there are multiple flaws in my gas utility proxy group. First, he disagrees with my decision to screen my proxy group based on the percentage of revenue from gas distribution operations instead of using the percentage of net operating income. This decision led to the exclusion of Southwest Gas Holdings, Inc. ("Southwest Gas") from my proxy group. Next, Mr. Nowak disagrees with my exclusion of Spire, Inc. ("Spire") due to their recent involvement in a significant transaction. Finally, he claims that I should have excluded Chesapeake Utilities Corporation ("Chesapeake") from my proxy group, because it violates two of his screening criteria. Ultimately, Mr. Nowak opines that his proxy group is more risk comparable to NFG than my proxy group.[19]

Q. DO YOU AGREE WITH MR. NOWAK'S ASSERTION THAT THE PERCENTAGE OF OPERATING INCOME IS A MORE APPROPRIATE PROXY GROUP CRITERION THAN REGULATED NATURAL GAS DISTRIBUTION REVENUE?

A. No. Calculating the percentage of utility operating income that makes up the total operating income of a company is not always a reliable way of determining if a

[19] NFG Statement No. 10-R, pp. 33-37.

business is primarily a regulated utility. For example, operating income includes items such as depreciation, where it is possible for the regulated utility segment of a company to predominately have assets that are fully depreciated resulting in higher operating income. Although a utility may have assets that are significantly depreciated, it does not always indicate the level of business a company does. A parent company can have most of its utility assets depreciated but still do less business as a utility than it does in another business segment. Therefore, comparing the operating income of a gas utility segment to the total operating income of a company is not an appropriate criterion, so I believe SW is correctly excluded from my proxy group.

Q. DO YOU HAVE ANY FURTHER COMMENTS REGARDING MR. NOWAK'S CLAIM THAT NET OPERATING INCOME IS A MORE APPROPRIATE PROXY GROUP CRITERION?

A. Yes. Not only do I disagree with this as I explained above, but the Commission has historically used utility revenue, and not operating income, to determine a company's validity in a proxy group. Most recently, in the Columbia Gas of Pennsylvania, Inc. 2025 base rate proceeding, the Commission order states, "…the generation of revenue is the first step that drives the company's net income and cash flow… Therefore, a utility's revenue composition is a more appropriate measure than is the utility's operating income or net income for establishing a proxy group, because this measure represents the percentage of cash flow a

company receives from each business segment."[20] The Commission further supports I&E's methodology by stating, "Accordingly, we shall adopt the ALJs' recommendation to utilize I&E's Natural Gas Utility proxy group in setting the appropriate rate of return for Columbia in this proceeding."[21]

Q. ARE THERE MORE INSTANCES OF THE COMMISSION ACCEPTING I&E'S METHODOLOGY IN DETERMINING A PROXY GROUP?

A. Yes. There are four recent instances where the Commission has accepted I&E's methodology to use percentage of revenues in selecting a proxy group. First, in *Pennsylvania Public Utility Commission, et. al v. Columbia Gas of Pennsylvania, Inc*., at Docket R-2020-3018835 (Order Entered February 19, 2021), pp. 110-112, the Commission adopted the ALJ's recommendation to use I&E's proxy group based on I&E's reasoning to exclude two companies based on a percentage of revenues as it most closely resembles the company.

Second, in *Pennsylvania Public Utility Commission, et. al v. PECO Energy Company – Gas Division*, at Docket R-2020-3018929 (Order Entered June 22, 2021, Public Version), pp. 137-139, the Commission again adopted the ALJ's recommendation to use I&E's proxy group based on I&E's reasoning to exclude

[20] *Pa. PUC v. Columbia Gas of Pennsylvania, Inc.,* Docket No. R-2025-3053499 (Order Entered December 9, 2025). *See generally* Disposition of Proxy Groups, p. 204.

[21] *Pa. PUC v. Columbia Gas of Pennsylvania, Inc.,* Docket No. R-2025-3053499 (Order Entered December 9, 2025). *See generally* Disposition of Proxy Groups, p. 205.

two companies based on a percentage of revenues as it most closely resembles the company.

Third, in *Pennsylvania Public Utility Commission, et. al v Columbia Water Company,* at Docket No. R-2023-3040258 (Order Entered January 18, 2024), pp. 74-77, the Commission adopted the ALJ's recommendation to use I&E's proxy group based on I&E's reasoning stating that "In our view, comparing the net operating income of a water utility segment to the total net operating income of a company is not an appropriate criterion to use in this proceeding."

Fourth, in *Pennsylvania Public Utility Commission, et. al v. Pennsylvania-American Water Company*, Docket Nos. R-2023-3043189 and R-2023-3043190 (Order Entered July 22, 2024), pp. 149-153, the Commission adopted the ALJ's recommendation to use I&E's proxy group based on I&E's reasoning, which included percentage of utility revenue, citing Commission precedent and references the above Columbia Water Company case.

Q. WHAT IS YOUR RESPONSE TO MR. NOWAK'S COMMENTS REGARDING SPIRE'S RECENT TRANSACTION?

A. I maintain my position that Spire should not be included in Mr. Nowak's or my proxy group. As Mr. Nowak himself states, "... I recognize that Spire is involved in a significant transaction to acquire the Tennessee assets of Piedmont Natural

Gas from Duke…".[22] A transaction of such significance violates Mr. Nowak's proxy group screening criterion that a company "[i]s not involved in a merger or other transformative transaction."[23] Additionally, as shown in the exhibit accompanying my direct testimony, between the announcement of the transaction on July 29, 2025 and the formation of my direct testimony on March 19, 2026, the remainder of Mr. Nowak's proxy group's stock prices grew an average of 16.36%, while Spire's stock price rose 25.64%.[24] For these reasons, I have excluded it from my proxy group, and believe it to be an inappropriate inclusion in Mr. Nowak's proxy group.

Q. WHAT IS YOUR RESPONSE TO MR. NOWAK'S COMMENTS REGARDING YOUR EXCLUSION OF CHESAPEAKE UTILITIES, INC?

A. I continue to assert that Chesapeake is a valid inclusion in my proxy group. Mr. Nowak opines that it is not an appropriate inclusion due to its lack of credit ratings from S&P Global or Moody's, and that its regulated operating income from gas distribution operations is only slightly more than 50%. While this violates his proxy group criteria, I do not screen for investment grade credit ratings, and its fiscal year 2024 revenues show that 82.59% of Chesapeake's operating revenue is

[22] NFG Statement No. 10-R, p. 35, lines 12-13.
[23] NFG Statement No. 10, p. 25, line 7.
[24] I&E Exhibit No. 2, Schedule 3.

from gas distribution operations.[25] Chesapeake meets all of my proxy group criteria, and I believe it is still appropriate to include them in my proxy group.

DISCOUNTED CASH FLOW

Q. SUMMARIZE MR. NOWAK'S REBUTTAL TESTIMONY REGARDING YOUR DCF ANALYSIS.

A. Mr. Nowak agrees with my use of earnings growth rate projections in the calculation of my DCF result but disagrees with the way I calculated my dividend yield, although he does concede that our different methods of dividend yield calculation yield similar results. Also, he questions my change in methodology in the calculation of my recommendation from previous cases. Finally, Mr. Nowak asserts that my DCF result would be significantly higher if I had used his proxy group as my own.[26]

Q. WHAT IS YOUR RESPONSE TO MR. NOWAK'S CRITICISMS OF YOUR DCF ANALYSIS?

A. Regarding the change in my methodology from past cases, I have included the CAPM as part of my analysis due to the Commission's recent decisions to base the authorized ROE on a combination of the DCF and CAPM methods, as shown in my direct testimony.[27] I have also included the national average authorized ROE

[25] Response to NFG-I&E-I-4 – Breuning – Attachment B.
[26] NFG Statement 10-R, pp. 38-39.
[27] I&E Statement No. 2, p. 36, lines 3-6.

for gas distribution utilities because it reasonable and logical to include authorized returns from the Company's peers in accordance with the *Hope* and *Bluefield* cases.[28]

Mr. Nowak also states that my DCF result would increase by 79 basis points if I were to include Southwest Gas and Spire in my proxy group. He also states that a small increase would occur if I were to exclude Chesapeake from my proxy group. As I have thoroughly explained above, as well as in my direct testimony, the inclusion of Southwest Gas and Spire and the exclusion of Chesapeake from the proxy group is inappropriate, which would make any hypothetical analysis of DCF results involving these companies irrelevant.

CAPITAL ASSET PRICING MODEL

Q. SUMMARIZE MR. NOWAK'S REBUTTAL TESTIMONY REGARDING YOUR CAPM ANALYSIS.

A. First, Mr. Nowak disagrees with my use of the 10-year Treasury note as the risk-free rate and claims that the 30-year Treasury bond is the most appropriate risk-free rate to use in the calculation of the CAPM. Second, he disagrees with my use of a Kroll-based CAPM analysis as part of my CAPM recommendation. Finally, Mr. Nowak makes several upward adjustments to my CAPM analysis and recommends that the Commission give no weight to my Kroll-based CAPM

[28] I&E Statement No. 2, p. 36, ln. 18 through p. 37, ln. 3.

estimate, as he deems it too low to be acceptable for consideration in the calculation of a return of equity.[29]

RISK-FREE RATE

Q. WHAT IS MR. NOWAK'S RESPONSE TO YOUR USE OF THE YIELD ON THE 10-YEAR U.S. TREASURY NOTE?

A. Mr. Nowak claims his use of the yield on a 30-year U.S. Treasury Bond is more appropriate than my use of the yield on a 10-year Treasury Note because it better reflects the life of the underlying investment. He contends that since utility assets are long-duration investments, long-term Treasury bonds should be used as the risk-free rate.[30]

Q. IS THE LIFE OF THE INVESTMENT THE ONLY FACTOR THAT SHOULD BE CONSIDERED IN THE CHOICE OF A RISK-FREE RATE?

A. No. The risk-free rate is the return that can be earned without accepting any risk, and while the life of the investment can be considered in the choice of risk-free rates, the most important consideration is that the rate be as risk-free as possible. As explained in my direct testimony, I chose the 10-year Treasury Note as it mitigates the shortcomings of the short-term Treasury Bill and the 30-year Treasury Bond.[31] Although long-term Treasury Bonds have less risk of being

[29] NFG Statement No. 10-R, pp. 40-46.
[30] NFG Statement No. 10-R, pp. 43-44.
[31] I&E Statement No. 2, p. 32, line 21 through p. 33, line 6.

influenced by federal policies, they have substantial maturity risk associated with market risk. In addition, long-term Treasury Bonds bear the risk of unexpected inflation. As such, my choice of a 10-year Treasury Note is appropriate. Further, as also pointed out in my direct testimony, the Commission has agreed with I&E that the 10-year Treasury Note is the superior measure of the risk-free rate of return.[32]

Q. DOES THE PROJECTED RISK-FREE RATE NEED TO REPRESENT THE LONGEST PERIOD AVAILABLE?

A. No. The time period reflected in a projected risk-free rate should include the period in which rates will be in effect (the investment period), which is typically the Fully Projected Future Test Year (FPFTY), or the time determined by a company's rate case filing frequency. Ideally, all factors in determining an appropriate ROE, including the risk-free rate, will be reassessed during each base rate filing. Therefore, while an investor may hold a utility stock for 30 years or more, the Commission authorized return determined in the base rate filing is likely reassessed many times within that 30-year period.

As shown in the exhibit accompanying my direct testimony, the yield on the 10-year Treasury Note is expected to remain level at 4.20% from the second quarter of 2026 through the second quarter of 2027 and is forecasted to remain at

[32] *Pa. PUC v. UGI Utilities, Inc. – Electric Division;* Docket No. R-2017-2640058 (Order Entered October 25, 2018). *See generally* Disposition of Capital Asset Pricing Model (CAPM), p. 99.

4.20% from 2027-2031. For my forecasted CAPM analysis, I continued to use 4.20%, which is the average of all the yields I observed.[33]

KROLL ERP

Q. WHAT IS MR. NOWAK'S RESPONSE TO YOUR USE OF THE KROLL ERP CAPM ANALYSIS?

A. Mr. Nowak criticizes the result of my Kroll-based CAPM analysis, stating that the result of 8.55% is lower than any authorized ROE for a gas distribution company since at least 1980. He also makes multiple adjustments to my forecasted CAPM analysis, calculating a range of results from 10.59% to 11.77%.[34]

Q. WHAT IS YOUR RESPONSE TO MR. NOWAK'S REBUTTAL TESTIMONY CONCERNING THE KROLL ERP?

A. While the Kroll-based result of 8.55% may be lower than previous authorized ROEs for gas distribution companies, I do not believe it is appropriate to ask the Commission to give it no consideration. By Mr. Nowak's logic, it would be inappropriate to give any weight to his adjustments to my forecasted CAPM analysis that produce a result with an upper range of 11.77%, as by his own admission, he is unaware of an authorized ROE in the contiguous United States of 11.25% or higher in the past two years.[35]

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[33] I&E Exhibit No. 2, Schedule 15.
[34] NFG Statement No. 10-R, p. 47.
[35] Response to I&E-RR-D-3.

My inclusion of the Kroll ERP in my CAPM analysis is to provide more information to the Commission as they have recently expressed increasing interest in the CAPM model. Kroll is a trusted and publicly available source that bases their recommended ERP on current and forecasted economic and financial conditions.[36]

Mr. Nowak's opposition to my use of Kroll's ERP further demonstrates that the inputs to the CAPM are highly subjective and can lead to significantly different results. This is not the case with the DCF model.

Q. HAS THE COMMISSION COMMENTED ON THE USE OF THE KROLL ERP CAPM ANALYSIS?

A. Yes. The Commission's Columbia Gas of Pennsylvania, Inc. 2025 base rate proceeding order states, "…we are also persuaded to use informed judgment and to apply both I&E's traditional CAPM and its Kroll ERP CAPM analysis in setting the ROE for Columbia."[37] The Commission also notes that due to their belief that the results of I&E's traditional CAPM analysis were overstated, "...we will use the average of I&E's traditional CAPM ROE of 10.51% and I&E's Kroll ERP based CAPM ROE of 9.36%."[38]

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[36] I&E Statement No. 2, p. 34, lines 14-16.

[37] *Pa. PUC v. Columbia Gas of Pennsylvania, Inc.,* Docket No. R-2025-3053499 (Order Entered December 9, 2025). *See generally* Disposition of Rate of Return on Common Equity, p. 234.

[38] *Pa. PUC v. Columbia Gas of Pennsylvania, Inc.,* Docket No. R-2025-3053499 (Order Entered December 9, 2025). *See generally* Disposition of Rate of Return on Common Equity, p. 235.

Additionally, using Kroll's methodology eliminates the potential bias of any involved parties, as I use Kroll's recommended input of the 20-year Treasury yield in my analysis.

Q. HAVE YOU CHANGED YOUR CAPM RETURN ON EQUITY RECOMMENDATION AS A RESULT OF MR. NOWAK'S REBUTTAL TESTIMONY?

A. No. I continue to recommend using my average CAPM result of 9.25%[39] in conjunction with my DCF result of 10.47% and the national average authorized ROE of 9.70%.

EXCLUSION OF THE RP METHOD

Q. SUMMARIZE MR. NOWAK'S REBUTTAL TESTIMONY REGARDING THE USE OF THE RISK PREMIUM METHOD.

A. Mr. Nowak's argues that his Risk Premium analysis is a useful and appropriate method that should be used by the Commission in this proceeding. Mr. Nowak goes on to state that the model is a reliable predictor of the equity risk premium at various levels of interest rates.[40]

[39] I&E Statement No. 2, p. 35, line 15.
[40] NFG Statement No. 10-R, pp. 47-52.

Q. PLEASE EXPLAIN WHY YOU HAVE EXCLUDED A RISK PREMIUM METHOD IN YOUR ROE ANALYSIS.

A. I have excluded a Risk Premium method from my ROE analysis because it is a simplified version of the CAPM, therefore it suffers from the same criticisms. Most importantly, unlike the CAPM, the Risk Premium method does not recognize company specific, or proxy group specific risk through a beta coefficient, which Mr. Nowak acknowledges in his rebuttal testimony.[41] Further, the Commission has historically dismissed the Risk Premium method in determining an appropriate return on equity in base rate proceedings, which Mr. Nowak also acknowledges.[42]

BUSINESS RISK

Q. SUMMARIZE MR. NOWAK'S REBUTTAL TESTIMONY REGARDING NFG'S BUSINESS RISK.

A. In his rebuttal testimony, Mr. Nowak again states the Company's intentions regarding planned capital expenditures in 2026. He also attempts to refute my assertion that the consideration of NFG's size is not necessary or warranted in this proceeding. Finally, Mr. Nowak continues to argue that NFG is riskier than his utility proxy group due to its smaller size and faces significant customer concentration risk.[43]

[41] NFG Statement No. 10-R, p. 48, lines 6-7.
[42] NFG Statement No. 10-R, p. 49, lines 17-18.
[43] NFG Statement No. 10-R, pp. 52-59.

CAPITAL EXPENDITURES

Q. SUMMARIZE MR. NOWAK'S REBUTTAL TESTIMONY REGARDING NFG'S CAPITAL EXPENDITURE PLANS.

A. As stated in his direct testimony, Mr. Nowak reiterates NFG's plan to spend an estimated $185 to $205 million on capital expenditures in 2026. He opines that the Company will need a higher authorized ROE in order to access capital to fund these plans on favorable terms.[44]

Q. WHAT IS YOUR RESPONSE TO MR. NOWAK'S CLAIMS REGARDING NFG'S CAPITAL EXPENDITURE PLANS?

A. As stated in my direct testimony, all regulated utilities, including NFG, have the option to file a base rate case at any time if there is a revenue inadequacy stemming from maintaining, expanding, and modernizing infrastructure.[45] Additionally, every gas utility in our respective proxy groups is exposed to similar risks regarding capital expenditures and maintaining and replacing infrastructure. Prospective investors are aware of these risks, which are factored into stock prices, as well as analyst's forecasted growth rates.

[44] NFG Statement No. 10-R, p. 53.
[45] I&E Statement No. 2, p. 44, lines 6-9.

SIZE EFFECT

Q. SUMMARIZE MR. NOWAK'S REBUTTAL TESTIMONY REGARDING NFG'S SMALLER RELATIVE SIZE.

A. Mr. Nowak presents additional literature in an attempt to support his claim that NFG is exposed to greater risk due to its smaller relative size when compared to his proxy group.[46]

Q. WHAT IS YOUR RESPONSE TO MR. NOWAK'S CLAIMS REGARDING NFG'S SIZE?

A. The difficulty in predicting the effect of size is demonstrated in the variance from year to year of the measurement of difference between the annual returns on the large and small-capitalization stocks of the NYSE/AMEX/NASDAQ in the Ibbotson *Stocks, Bonds, Bills & Inflation: 2015 Yearbook.* As stated on page 100 of the SBBI Yearbook,

> While the largest stocks actually declined in 2001, the smallest stocks rose more than 30%. A more extreme case occurred in the depression-recovery year of 1933, when the difference between the first and 10th decile returns was far more substantial. The divergence in the performance of small- and large- cap stocks is evident. In 30 of the 89 years since 1926, the difference between the total returns of the largest stocks (decile 1) and the smallest stocks (decile 10) has been greater than 25 percentage points.

[46] NFG Statement No. 10-R, pp. 54-57.

Page 109 states,

> In four of the last 10 years, large-capitalization stocks (deciles 1-2 of NYSE/AMEX/NASDAQ) have outperformed small-capitalization stocks (deciles 9-10). This has led some market observers to speculate that there is no size premium. But statistical evidence suggests that periods of underperformance should be expected.

Page 112 states,

> Because investors cannot predict when small-cap returns will be higher than large-cap returns, it has been argued that they do not expect higher rates of return for small stocks.

In my opinion, it is not appropriate to link the small size effect of non-regulated companies with the regulated utility industry because regulated utilities, small or large, have a market monopoly in the certificated service jurisdiction and are permitted to seek recovery of the full cost of service and a fair and reasonable rate of return on rate base. Furthermore, as I stated in direct testimony, any expense impact resulting from the lesser buying power of a smaller utility is reflected in the revenue requirement and the dollar-for-dollar recovery that applies to expenses.[47] To apply an additional size adjustment to a smaller regulated utility would only duplicate the burden to ratepayers.

Finally, given Mr. Nowak's lack of an explicit size adjustment to his recommended ROE, I believe that any argument made regarding NFG's size is irrelevant. I continue to recommend that the Commission give no weight to the

[47] I&E Statement No. 2, p. 47, lines 8-12.

notion that an adjustment to the authorized ROE to account for size is necessary in this proceeding.

CUSTOMER CONCENTRATION RISK

Q. SUMMARIZE MR. NOWAK'S REBUTTAL TESTIMONY REGARDING NFG'S CUSTOMER CONCENTRATION RISK.

A. Similar to his direct testimony, Mr. Nowak opines that NFG's smaller size increases the risk surrounding the Company regarding the loss of a large customer. He then adds that changing geopolitical events and economic uncertainty concerning the current conflict in the Middle East creates greater risk for NFG. Finally, he contends that my assertion that NFG can file a rate case at any time to address revenue inadequacies is not an applicable solution.[48]

Q. WHAT IS YOUR RESPONSE TO MR. NOWAK'S REBUTTAL TESTIMONY REGARDING NFG'S CUSTOMER CONCENTRATION RISK?

A. My position remains unchanged from my direct testimony. I continue to assert that mechanisms such as the FPFTY and the Distribution System Improvement Charge (DSIC) play a significant role in reducing a utilities regulatory lag and overall financial risk profile. These risk-reducing mechanisms should be

[48] NFG Statement No. 10-R, pp. 57-59.

considered in conjunction with the fact that regulated utilities have the opportunity to recover all prudent expenses through a base rate case. Additionally, given that Mr. Nowak is unaware of NFG's loss of any large customer in recent years,[49] paired with his lack of an explicit adjustment to his requested ROE for customer concentration risk, I recommend that the Commission give this argument no consideration.

OVERALL RATE OF RETURN

Q. PLEASE RESTATE I&E'S RECOMMENDED COST OF EQUITY AND OVERALL RATE OF RETURN.

A. As noted earlier in my rebuttal testimony, I calculate the appropriate cost of equity to be 9.81% for NFG, with an overall rate of return of 7.91%.

Q. DO YOU HAVE ANY FINAL COMMENTS REGARDING YOUR RETURN ON EQUITY AND OVERALL RATE OF RETURN ANALYSIS?

A. Yes. As stated above, there have been current concerns regarding utility bill affordability as addressed in various statements by Commissioner Barrow[50] and concerns raised by Governor Shapiro in a recently issued letter to Pennsylvania Utility Leaders regarding higher utility costs and enormous profits earned by utilities in 2024.[51] These concerns highlight the importance of ratepayers only

[49] NFG Statement No. 10-R, p. 57, lines 16-17.
[50] I&E Exhibit No. 2, Schedules 4 and 5.
[51] I&E Exhibit No. 1-SR, Schedule 2, pp. 1-4.

being required to pay rates to fund costs that are necessary for the safe and reliable provision of natural gas service. I believe that my recommendations allow the Company to earn a fair return while considering the cost to ratepayers. Given the current economic climate, it is important that ratepayers only be required to pay rates to fund costs that are absolutely necessary for the safe and reliable provision of natural gas service.

Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

A. Yes. However, I reserve the right to supplement my testimony or to revise recommendations if additional issues or facts arise during this proceeding. Further, as stated above, the lack of response to any topic or recommendation should not be interpreted as agreement with the other parties' recommendations.

I&E Statement No. 3
Witness: Ethan H. Cline

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

Docket No. R-2026-3059428

Direct Testimony

of

Ethan H. Cline

Bureau of Investigation and Enforcement

Concerning:

Fully Projected Future Test Year Reporting Requirements
Weather Normalization Adjustment
Cost of Service Study
Scale Back of Rates

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INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Ethan H. Cline. My business address is Pennsylvania Public Utility Commission, Commonwealth Keystone Building, 400 North Street, Harrisburg, PA 17120.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by the Pennsylvania Public Utility Commission (Commission) in the Bureau of Investigation and Enforcement (I&E) as a Fixed Utility Valuation Engineer.

Q. WHAT IS YOUR EDUCATION AND PROFESSIONAL BACKGROUND?

A. My education and professional background are set forth in Appendix A, which is attached to my direct testimony.

Q. PLEASE DESCRIBE THE ROLE OF I&E IN RATE PROCEEDINGS.

A. I&E is responsible for protecting the public interest in proceedings before the Commission. The I&E analysis in this proceeding is based on its responsibility to represent the public interest. This responsibility requires the balancing of the interests of ratepayers, the regulated utility, and the regulated community as a whole.

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A. My direct testimony relates to National Fuel Gas Distribution Corporation (NFG or Company) requested base rate revenue increase of $19,680,503.[1] My testimony specifically addresses Fully Projected Future Test Year (FPFTY) reporting, the Weather Normalization Adjustment (WNA), cost of service study, and scale back of rates.

Q. DOES YOUR TESTIMONY INCLUDE AN EXHIBIT?

A. Yes. I&E Exhibit No. 3 contains schedules that support my direct testimony.

Q. WHAT TEST YEAR DID THE COMPANY ELECT TO USE IN THIS PROCEEDING?

A. National Fuel elected to base its rates on a FPFTY ending October 31, 2027. The Company also addressed a historic test year (HTY) ended September 30, 2025 and future test year (FTY) ending September 30, 2026.[2]

[1] National Fuel Exhibit No. E, p. 1.
[2] National Fuel Statement No. 2, pp. 3-4.

FPFTY REPORTING REQUIREMENTS

Q. DID THE COMPANY PROVIDE A SCHEDULE SHOWING PLANT ADDITIONS AND RETIREMENTS THAT SUPPORT THE PROJECTED LEVEL OF TOTAL PLANT IN THE FPFTY?

A. Yes. The Company provided NFG Exhibit A - FPFTY, Schedule C-2 and NFG Exhibit A - FTY, Schedule C-2 showing account details for the plant additions and retirements totaling $884,662,000 for the FTY and $957,237,000 for the FPFTY.

Q. DO YOU HAVE ANY RECOMMENDATIONS REGARDING PLANT ADDITIONS THAT NFG PROJECTS TO BE IN SERVICE DURING THE FTY ENDING SEPTEMBER 30, 2026, AND THE FPFTY ENDING OCTOBER 31, 2027?

A. Yes. I recommend that the Company be required to provide I&E, the Office of Consumer Advocate, and any other interested parties with an update to NFG Exhibit A - FTY, Schedule C-2 no later than February 1, 2027, under this docket number, which should include actual capital expenditures, plant additions, and retirements by month for the twelve months ending September 30, 2026. And an additional update to NFG Exhibit A - FPFTY, Schedule C-2 should be required for actuals through October 31, 2027, no later than February 1, 2028.

Q. WHY DO YOU RECOMMEND THAT NFG BE REQUIRED TO PROVIDE THESE UPDATES?

A. There is value in determining how closely NFG's projected investments in future plant comport with the actual investments that are made by the end of the FTY and FPFTY. Determining the correlation between NFG's projected and actual results will help inform the Commission and the parties in NFG's future rate cases as to the validity of NFG's projections.

By using an FPFTY, NFG is requesting ratepayers pre-pay a return on its projected investment in future plant that is not in place and providing service at the time the new rates take effect but also are not subject to any guarantee of being completed and placed into service. While the FPFTY provides for such projections, there should be verification of those projections. Therefore, requiring the Company to share updates demonstrating that actual investments comport with FPFTY projections used in setting rates provides the Commission with actual data to gauge the accuracy of NFG's projected investments in future proceedings.

WEATHER NORMALIZATION ADJUSTMENT

Q. WHAT IS A WEATHER NORMALIZATION ADJUSTMENT?

A. The Company's Weather Normalization Adjustment (WNA) is a ratemaking mechanism that adjusts the delivery portion of customer bills so that they reflect

usage under normal weather conditions rather than actual temperatures experienced during the heating season.[3]

Q. DOES THE COMPANY HAVE AN EXISTING WNA?

A. Yes.

Q. HOW DOES THE COMPANY'S EXISTING WNA OPERATE?

A. NFG's existing WNA applies to all residential, commercial, and public authority customers. It adjusts usage in customer bills based on deviations from normal weather by comparing actual Heating Degree Days (HDDs) to normal HDDs based on a 15-year weather history during the heating season of October through May. The existing WNA includes a 3% deadband.[4]

Q. WHAT IS A DEADBAND?

A. A deadband applies to a WNA such that the adjustment is not triggered if Actual HDDs are within a certain threshold of the Normal HDDs. The deadband keeps the revenue and bill impacts of normal weather variations with the Company and the customers. The WNA is not designed to provide 100% weather-related revenue certainty.

[3] National Fuel Statement No. 19, pp. 23-24.
[4] National Fuel Statement No. 19, pp. 24-25.

Q. WHAT IS THE COMPANY PROPOSING REGARDING ITS WNA?

A. The Company is proposing to calculate its Normal HDDs based on ten years of National Oceanic and Atmospheric Administration (NOAA) weather data.

Q. DO YOU OPPOSE THE COMPANY'S PROPOSAL TO CALCULATE ITS NORMAL HDDS BASED ON TEN YEARS OF WEATHER DATA?

A. No. The Company's proposal to calculate its Normal HDDs based on ten years of weather data is reasonable because it more accurately reflects recent weather trends and is consistent with the Commission's Order in the recent Columbia Gas of Pennsylvania, Inc. (Columbia) base rate case.[5]

Q. ARE YOU RECOMMENDING ANY CHANGES TO THE WNA AS IT IS PROPOSED BY THE COMPANY?

A. Yes. I am recommending that the shoulder month of May be excluded from the calculation of the WNA and that the deadband be increased to 5%.

Q. WHY ARE YOU RECOMMENDING THE MONTH OF MAY BE EXCLUDED FROM THE MONTHS IN WHICH THE WNA IS APPLIED?

A. The month of May should be excluded from the calculation of the WNA because it is a shoulder month, outside of both the heating and summer periods, where

[5] *Pa. PUC v. Columbia Gas of Pennsylvania, Inc.*, Docket No. R-2025-3053499, pp. 301-02 (Order Entered December 4, 2025).

customers can expect to start experiencing a decrease in their heating bills. The Commission agreed with this position in the recent Columbia Order that the Company referred to in support of its proposal to calculate its Normal HDDs on a ten year basis.[6]

Q. WHY ARE YOU RECOMMENDING THE DEADBAND BE INCREASED FROM 3% TO 5%?

A. Similar to my recommendation to exclude the month of May from the calculation of the WNA, my recommendation to increase the deadband from 3% to 5% is supported by the recent Columbia Order, which stated "a 5% deadband adequately captures what could be considered normal weather fluctuations in Pennsylvania. It also places more of the burden for calculating and forecasting weather variations back onto the Company as a normal part of doing business."[7]

COST OF SERVICE

Q. WHAT IS AN ALLOCATED COST OF SERVICE (ACOS) STUDY (ACOSS)?

A. A utility provides service to a defined set of customer classes that are different in terms of demand and usage patterns. An ACOSS allocates or assigns a utility's revenue requirement based on those service differences. In other words, an

[6] National Fuel Statement No. 13, p. 8.

[7] *Pa. PUC v. Columbia Gas of Pennsylvania, Inc.*, Docket No. R-2025-3053499, pp. 301-02 (Order Entered December 4, 2025).

ACOSS is a formalized analysis of costs that attempts to assign to each customer or rate class its proportionate share of the Company's total cost of service (i.e., the Company's total revenue requirement). The results of such a study can be utilized to determine the relative cost of service for each class and help determine the individual class revenue requirements and, to the extent a particular class is above or below the system average rate of return, show the additional revenues each class receives or conversely the additional revenues that each class contributes to the Company's overall revenues. In addition to the relative provision of revenues, a relative rate of return is also provided, which shows how the rate of return for each class compares to the system average rate of return.

Q. WHAT ARE RATE OF RETURN AND RELATIVE RATE OF RETURN?

A. The rate of return is the Commission authorized return on rate base that is determined in a base rate proceeding. A relative rate of return indicates how the rate of return of each customer class compares to the system average rate of return. In general, a relative rate of return that provides revenue equal to its cost to serve would have a relative rate of return equal to 1.0. If a class of service has a relative rate of return below 1.0, the revenue received from that class does not cover the cost of providing service to that class. If a class of service has a relative rate of return above 1.0, the revenue received from that class exceeds the cost of providing service to that class.

Q. DID THE COMPANY PROVIDE AN ACOSSIN THIS PROCEEDING?

A. Yes. The Company performed two ACOSS in this case. The first, using the customer-demand method, is the ACOSS that the Company is proposing be used to allocate costs in this case where cost of mains are allocated as 61% customer-related and 39% as demand-related.[8] The second ACOSS performed by the Company was based on the Peak and Average method, with no customer component, was provided for informational and comparison purposes.[9]

Q. DO YOU AGREE WITH THE COMPANY'S PROPOSAL TO ALLOCATE COSTS BASED ON THE CUSTOMER-DEMAND METHODOLOGY THAT INCLUDES A CUSTOMER-RELATED ALLOCATION OF THE COST OF MAINS?

A. No. The Company's customer-demand allocation proposal is inconsistent with long-standing Commission precedent that was reaffirmed in the recent Columbia Gas order. In it, the Commission stated the following:

> In light of the above, we remain of the opinion that although mains serve customers, it is the throughput that determines the type of main investment because it is the load that determines the main investment, not the number of customers served. As the Commission stated in *Columbia Gas 2021*, the existence of one customer, five customers, or ten customers does not determine the amount of mains investment. Mains investment is driven by the loads placed upon it, not by the number of customers served. *Columbia Gas 2021* at 217.

[8] National Fuel Statement No. 19, p. 12.
[9] National Fuel Statement No. 19, p. 17.

> Furthermore, distribution mains exist and are related to both annual demands and peak demands. Both annual and peak demands must be recognized in the allocation of distribution mains cost if the allocation is to be in accord with the principle of cost-causality. It is not reasonable to allocate distribution mains investment based solely on design peak day demands as in Columbia's Customer-Demand ACCOSS. The basic reason Columbia invests in its distribution system is to meet the annual demands for gas by customers. Additionally, a portion of the total cost of distribution service is related to installing a system with enough throughput capacity to meet design peak demands in excess of annual demands.
>
> For all these reasons, we find that the Peak & Average allocation methodology is the most appropriate allocation methodology to use in this proceeding because it is based on the premise of load-based investment.[10]

The Company has not provided any reason to support its proposal for the Commission to reverse its precedent and allow the cost of mains to be allocated based on number of customers.

Q. WHAT DO YOU RECOMMEND REGARDING THE ACOSS?

A. I recommend that the Commission allocate revenues and design rates based on the Peak and Average ACOSS provided by the Company.[11]

[10] *Pa. PUC v. Columbia Gas of Pennsylvania, Inc.*, Docket No. R-2025-3053499, pp. 254-5 (Order Entered December 4, 2025).

[11] The Peak and Average ACOSS was provided electronically in response to OCA-I-3 and summary page under present and proposed rates is attached as I&E Exhibit No. 3, Schedule 1.

REVENUE ALLOCATION

Q. ARE YOU RECOMMENDING AN ADJUSTMENT TO THE COMPANY'S PROPOSED REVENUE ALLOCATION?

A. Yes. The Company's proposed revenue allocation is based upon its customer-demand ACOSS. As I am recommending the Commission reject the proposed customer-demand ACOSS in favor of the Peak and Average ACOSS, I am also recommending the proposed allocation based on that model also be rejected in favor of an allocation based on the Peak and Average ACOSS.

Q. WHAT ARE THE REVENUES AND RELATIVE ROR BY CLASS UNDER PRESENT RATES BASED ON THE PEAK AND AVERAGE ACOSS?

A. The revenues and relative ROR by class under present rates based on the Peak and Average ACOSS are shown on the table below[12]:

Rate Class	Present Rate Revenue ($ in thousands)	Present Rate ROR (P&A)
Residential	$97,367	1.07
SCPA-LL	$6,819	1.65
SCPA-UL	$6,989	0.63
LCPA	$13,908	1.12
NGV	$131	(0.42)
SVIS	$444	2.18
IVIS	$5,876	0.95
LVIS	$2,730	0.75
LIS	$1,416	(0.30)

[12] I&E Exhibit No. 3, Schedule 1.

Q. WHAT REVENUE ALLOCATION ARE YOU RECOMMENDING?

A. The revenue allocation I am recommending, based on the Peak and Average ACOSS, is shown in the table below[13]:

I&E Recommended Revenue Allocation ($ in thousands)					
Rate Class	Current Revenues	Increase	Proposed Revenues	Percent Increase	Relative ROR under proposed rates
Residential	$97,367	$13,050	$110,417	13%	1.05
SCPA-LL	$6,819	$800	$7,619	12%	1.42
SCPA-UL	$6,989	$1,400	$8,389	20%	0.84
LCPA	$13,908	$2,199	$16,107	16%	1.05
NGV	$131	$26	$157	20%	(0.07)
SVIS	$444	$0	$444	0%	1.36
IVIS	$5,876	$1,150	$7,076	20%	1.00
LVIS	$2,730	$540	$3,270	20%	0.85
LIS	$1,416	$500	$2,970	20%	0.05
Total:	$136,735	$19,665	$156,400	14%	

Q. WHY DID YOU RECOMMEND THE REVENUE ALLOCATION SHOWN IN THE TABLE ABOVE?

A. My recommended revenue allocation, shown in the table above, is reasonable because it both moves each rate class towards a relative ROR of 1.0, based on the Peak and Average ACOSS, while adhering to the concept of gradualism by not

[13] I&E Exhibit No. 3, Schedule 2.

recommending an increase above 1.5x the system average increase, or approximately 20% (1.5 x 14%).

CUSTOMER COST ANALYSIS

Q. WHAT IS A CUSTOMER COST ANALYSIS AND HOW IS IT USED?

A. A customer cost analysis is part of a cost of service study that includes only customer costs. It is used as a guide in determining the appropriate customer charges for the various classes.

Q. DID THE COMPANY PROVIDE A CUSTOMER COST ANALYSIS IN ITS FILING?

A. No. The Company did not provide a separate customer cost analysis in its filing. The claimed unit cost per customer of $27.17 is based upon the customer classification in the customer-demand ACOSS.[14]

Q. IS THE $27.17 UNIT COST PER CUSTOMER REASONABLE?

A. No. As described above, the Commission has consistently determined that the Peak and Average ACOS method is preferred over the customer-demand ACOS method. Therefore, the Company's claimed unit cost per customer of $27.17 that

[14] National Fuel Exhibit D, Schedule 7, p. 3.

is based upon the customer-demand ACOSS is not reasonable and should be rejected.

Q. ARE YOU ABLE TO CREATE A CUSTOMER COST ANALYSIS BASED ON THE PEAK AND AVERAGE ACOS?

A. No. Based on the information provided by the Company, I am unable to perform a customer cost analysis based on the Peak and Average ACOS.

Q. WHAT IS THE COMPANY RECOMMENDING REGARDING THE BASIC SERVICE CHARGE FOR THE VARIOUS CLASSES?

A. The Company is recommending increasing the basic service charges for each customer class (except for the LCPA, SVIS, and IVIS) consistent with the results of its customer cost analysis.[15]

Q. WHAT DO YOU RECOMMEND REGARDING THE BASIC SERVICE CHARGES PROPOSED BY THE COMPANY?

A. As I described above, NFG did not provide a customer cost analysis based on the Peak and Average ACOSS. As such, the basic service charge increases proposed by the Company are unsupported. Therefore, I recommend the Commission limit the increase in basic service charges proposed by the Company to approximately

[15] National Fuel Statement No. 14, p. 17.

the as the same class percent increase unless and until they are supported by an appropriate customer cost analysis. As an example, the residential class customer charge would be no more than approximately 13%, or to $15.80, which is the increase to the residential class I have recommended based on the Peak and Average ACOSS.

Q. DO YOU HAVE ANY RECOMMENDATIONS IF THE COMPANY PROVIDES A PEAK AND AVERAGE CUSTOMER COST ANALYSIS OR THE COMMISSION REJECTS YOUR BASIC SERVICE CHARGE RECOMMENDATION?

A. Yes. If the Company provides support for its proposed basic service charges in the form of a customer cost analysis based on the Peak and Average ACOS methodology or the Commission does not agree with my above recommendation, I recommend that any basic service charge that receives an increase be included in the scale back of rates.

Q. WHY DO YOU RECOMMEND ANY BASIC SERVICE CHARGES THAT ARE PROPOSED AN INCREASE BE INCLUDED IN THE SCALE BACK OF RATES?

A. Basic service charges represent a portion of a customer's bill that does not change regardless of usage level. Setting the basic service charge must strike a balance between cost-based rates, gradualism, and customer conservation efforts.

Including the basic service charge in the scale back of rates represents movement towards cost-based rates while adhering to the concept of gradualism. It also reduces the impact to customer conservation that would occur if only the usage rates were included in the scale back of rates. Further, my recommendation is consistent with the Commission's decision in the recent Columbia Gas case in which it reduced Columbia's proposed customer charge and then included that reduced customer charge in the scale back of rates.[16]

SCALE BACK OF RATES

Q. WHAT DO YOU RECOMMEND IF THE COMMISSION GRANTS LESS THAN THE $19.7 MILLION REVENUE INCREASE REQUESTED BY THE COMPANY?

A. If the Commission grants less than the $19.7 million revenue increase requested by the Company, I recommend rates, including the customer charges that are proposed an increase, be scaled back proportionately based upon the cost of service study ultimately approved by the Commission.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes. However, I reserve the right to supplement my testimony or to revise recommendations if additional issues or facts arise during this proceeding.

[16] *Pa. PUC v. Columbia Gas of Pennsylvania, Inc.*, Docket No. R-2025-3053499, pp. 280-3 (Order Entered December 4, 2025).

ETHAN H. CLINE

PROFESSIONAL EXPERIENCE AND EDUCATION

EXPERIENCE:

03/2009 - Present
Bureau of Investigation and Enforcement, Pennsylvania Public Utility Commission - Harrisburg, Pennsylvania

Fixed Utility Valuation Engineer – Assists in the performance of studies and analyses of the engineering-related areas including valuation, depreciation, cost of service, quality and reliability of service as they apply to fixed utilities. Assists in reviewing, comparing and performing analyses in specific areas of valuation engineering and rate structure including valuation concepts, original cost, rate base, fixed capital costs, inventory processing, excess capacity, cost of service, and rate design.

06/2008 – 09/2008
Akens Engineering, Inc. - Shiremanstown, Pennsylvania

Civil Engineer – Responsible, primarily, for assisting engineers and surveyors in the planning and design of residential development projects

10/2007 – 05/2008
J. Michael Brill and Associates - Mechanicsburg, Pennsylvania

Design Technician – Responsible, primarily, for assisting engineers in the permit application process for commercial development projects.

01/2006 – 10/2007
CABE Associates, Inc. - Dover, Delaware

Civil Engineer – Responsible, primarily, for assisting engineers in performing technical reviews of the sewer and sanitary sewer systems of Sussex County, Delaware residential development projects.

EDUCATION:

Pennsylvania State University, State College, Pennsylvania
Bachelor of Science; Major in Civil Engineering, 2005

- Attended NARUC Rate School, Clearwater, FL
- Attended Society of Depreciation Professionals Annual Conference and Training

TESTIMONY SUBMITTED:

I have testified and/or submitted testimony in the following proceedings:

1. Clean Treatment Sewage Company, Docket No. R-2009-2121928
2. Pennsylvania Utility Company – Water Division, Docket No. R-2009-2103937
3. Pennsylvania Utility Company – Sewer Division, Docket No. R-2009-2103980
4. UGI Central Penn Gas, Inc., 1307(f) proceeding, Docket No. R-2010-2172922
5. PAWC Clarion Wastewater Operations, Docket No. R-2010-2166208
6. PAWC Claysville Wastewater Operations, Docket No. R-2010-2166210
7. Citizens' Electric Company of Lewisburg, Pa, Docket No. R-2010-2172665
8. City of Lancaster – Bureau of Water, Docket No. R-2010-2179103
9. Peoples Natural Gas Company LLC, Docket No. R-2010-2201702
10. UGI Central Penn Gas, Inc., Docket No. R-2010-2214415
11. Pennsylvania-American Water Company, Docket No. R-2011-2232243
12. Pentex Pipeline Company, Docket No. A-2011-2230314
13. Peregrine Keystone Gas Pipeline, LLC, Docket No. A-2010-2200201
14. Philadelphia Gas Works 1307(f), Docket No. R-2012-2286447
15. Peoples Natural Gas Company LLC, Docket No. R-2012-2285985
16. Equitable Gas Company, Docket Nos. R-2012-2312577, G-2012-2312597
17. City of Lancaster – Sewer Fund, Docket No. R-2012-2310366
18. Peoples TWP, LLC 1307(f), Docket No. R-2013-2341604
19. UGI Penn Natural Gas, Inc. 1307(f), Docket No. R-2013-2361763
20. UGI Central Penn Gas, Inc. 1307(f), Docket No. R-2013-2361764
21. Joint Application, Docket Nos. A-2013-2353647, A-2013-2353649, A-2013-2353651
22. City of Dubois – Bureau of Water, Docket No. R-2013-2350509
23. The Columbia Water Company, Docket No. R-2013-2360798
24. Pennsylvania American Water Company, Docket No. R-2013-2355276
25. Generic Investigation Regarding Gas-on-Gas Competition, Docket Nos. P-2011-227868, I-2012-2320323
26. Philadelphia Gas Works 1307(f), Docket No. R-2014-2404355
27. Pike County Light and Power Company (Gas), Docket No. R-2013-2397353
28. Pike County Light and Power Company (Electric), Docket No. R-2013-2397237
29. Peoples Natural Gas Company LLC 1307(f), Docket No. R-2014-2403939
30. UGI Penn Natural Gas, Inc. 1307(f), Docket No. R-2014-2420273
31. UGI Utilities, Inc. – Gas Division 1307(f), Docket No. R-2014-2420276
32. UGI Central Penn Gas, Inc. 1307(f), Docket No. R-2014-2420279
33. Emporium Water Company, Docket No. R-2014-2402324
34. Borough of Hanover – Hanover Municipal Water, Docket No. R-2014-2428304
35. Philadelphia Gas Works 1307(f), Docket No. R-2015-2465656
36. Peoples Natural Gas Company LLC 1307(f), Docket No. R-2015-2465172
37. Peoples Natural Gas Company – Equitable Division 1307(f), Docket No. R-2015-2465181
38. PPL Electric Utilities Corporation, Docket No. R-2015-2469275
39. UGI Penn Natural Gas, Inc. 1307(f), Docket No. R-2015-2480934

40. UGI Central Penn Gas, Inc. 1307(f), Docket No. R-2015-2480937
41. UGI Utilities, Inc. – Gas Division 1307(f), Docket No. R-2015-2480950
42. UGI Utilities, Inc. – Gas Division, Docket No. R-2015-2518438
43. Joint Application of Pennsylvania American Water, et al., Docket No. A-2016-2537209
44. UGI Utilities, Inc. – Gas Division 1307(f), Docket No. R-2016-2543309
45. UGI Central Penn Gas, Inc. 1307(f), Docket No. R-2016-2543311
46. City of Dubois – Company, Docket No. R-2016-2554150
47. UGI Penn Natural Gas, Inc., Docket No. R-2016-2580030
48. UGI Central Penn Gas, Inc. 1307(f), Docket No. R-2017-2602627
49. UGI Penn Natural Gas, Inc. 1307(f), Docket No. R-2017-2602633
50. UGI Utilities, Inc. – Gas Division 1307(f), Docket No. R-2017-2602638
51. Application of Pennsylvania American Water Company Acquisition of the Municipal Authority of the City of McKeesport, Docket No. A-2017-2606103
52. Pennsylvania American Water Company, Docket No. R-2017-2595853
53. Pennsylvania American Water Company Lead Line Petition, Docket No. P-2017-2606100
54. UGI Utilities, Inc. – Electric Division, Docket No. R-2017-2640058
55. Peoples Natural Gas Company, LLC – Peoples and Equitable Division 1307(f), Docket Nos. R-2018-2645278 & R-2018-3000236
56. Peoples Gas Company, LLC 1307(f), Docket No. R-2018-2645296
57. Columbia Gas of Pennsylvania, Inc., Docket No. R-2018-2647577
58. Duquesne Light Company, Docket No. R-2018-3000124
59. Suez Water Pennsylvania, Inc., Docket No. R-2018-3000834
60. Application of Pennsylvania American Water Company Acquisition of the Municipal Authority of the Township of Sadsbury, Docket No. A-2018-3002437
61. The York Water Company, Docket No. R-2018-3000006
62. Application of SUEZ Water Pennsylvania, Inc. Acquisition of the Water and Wastewater Assets of Mahoning Township, Docket Nos. A-2018-3003517 and A-2018-3003519
63. Pittsburgh Water and Sewer Authority, Docket Nos. R-2018-3002645 and R-2018-3002647
64. Joint Application of Aqua America, Inc. et al., Acquisition of Peoples Natural Gas Company LLC, et al., Docket Nos. A-2018-3006061, A-2018-3006062, and A-2018-3006063
65. Implementation of Chapter 32 of the Public Utility Code Regarding Pittsburgh Water and Sewer Authority, Docket Nos. M-2018-2640802 and M-2018-2640803
66. Philadelphia Gas Works 1307(f), Docket No. R-2019-3007636
67. People Natural Gas Company, LLC, Docket No. R-2018-3006818
68. Application of Pennsylvania American Water Company Acquisition of the Steelton Borough Authority, Docket No. A-2019-3006880
69. Application of Aqua America, Inc. et al., Acquisition of the Wastewater System Assets of the Township of Cheltenham, Docket No. A-2019-3006880
70. Philadelphia Gas Works, Docket No. R-2019-3009016
71. Wellsboro Electric Company, Docket No. R-2019-3008208
72. Valley Energy, Inc., Docket No. R-2019-3008209
73. Citizens' Electric Company of Lewisburg, Pa, Docket Non. R-2019-3008212

74. Application of Aqua America, Inc. et al., Acquisition of the Wastewater System Assets of the East Norriton Township, Docket No. A-2019-3009052
75. Peoples Natural Gas Company, LLC 1307(f), Docket No. R-2020-3017850
76. Peoples Gas Company, LLC 1307(f), Docket No. R-2020-3017846
77. Philadelphia Gas Works, Docket No. R-2020-3017206
78. Pittsburgh Water and Sewer Authority, Docket Nos. R-2020-3017951 et al.
79. Columbia Gas of Pennsylvania, Docket No. R-2020-3018835
80. Pennsylvania America Water Company, Docket Nos. R-2020-3019369 and R-2020-3019371
81. PECO Energy Company – Gas Division, Docket No. R-2020-3019829
82. PGW 1307(f), Docket No. R-2021-3023970
83. Peoples Natural Gas Company, LLC 1307(f), Docket No. R-2021-3023965
84. Peoples Gas Company, LLC 1307(f), Docket No. R-2021-3023967
85. UGI Utilities, Inc. – Electric Division, Docket No. R-2021-3023618
86. Columbia Gas of Pennsylvania, Inc., Docket No. R-2021-3024926
87. Duquesne Light Company, Docket No. R-2021-3024750
88. UGI Utilities, Inc. – Gas Division 1307(f), Docket No. R-2021-3025652
89. Pittsburgh Water and Sewer Authority, Docket Nos. R-2021-3024773 et al.
90. Application of Aqua America Wastewater, Inc. et al., Acquisition of the Wastewater System Assets of Lower Makefield Township, Docket No. A-2021-3024267
91. Aqua Pennsylvania Water, Inc. and Aqua Pennsylvania Wastewater, Inc., Docket Nos. R-2021-3027385 and R-2021-3027386
92. Application of Pennsylvania-American Water Company for Acquisition of the Wastewater Collection and Treatment System Assets of the York City Sewer Authority, Docket No. A-2021-3024681
93. City of Lancaster – Bureau of Water, Docket No. R-2021-3026682
94. Application of Aqua America Wastewater, Inc. et al., Acquisition of the Wastewater System Assets of East Whiteland Township, Docket No. A-2021-30246132
95. UGI Utilities, Inc. – Gas Division, Docket No. R-2021-3030218
96. Peoples Natural Gas Company, LLC 1307(f), Docket No. R-2022-3030661
97. Columbia Gas of Pennsylvania, Inc., Docket No. R-2022-3031211
98. UGI Utilities, Inc. – Gas Division 1307(f), Docket No. R-2022-3032242
99. Pennsylvania American Water Company, Docket Nos. R-2022-3031672 and R-2022-3031673
100. The York Water Company, Docket Nos. R-2022-3031340 and R-2022-3032806
101. Columbia Gas of Pennsylvania, Inc., Docket No. R-2022-3032167
102. National Fuel Gas Distribution Corporation, Docket No. R-2022-3035730
103. UGI Utilities, Inc. – Electric Division, Docket No. R-2022-3037368
104. Application of Pennsylvania-American Water Company for Acquisition of the Wastewater Collection and Treatment System Assets of the Butler Area Sewer Authority, Docket No. A-2022-3037047
105. Philadelphia Gas Works, Docket No. R-2023-3037933
106. Pittsburgh Water and Sewer Authority, Docket Nos. R-2023-3039920 et al.

107. Pennsylvania-American Water Company, Docket Nos. R-2023-3043189 and R-2023-3043190
108. Peoples Natural Gas Company, LLC, Docket No. R-2023-3044549
109. Duquesne Light Company, Docket No. R-2024-3046523
110. PECO Energy Company – Gas Division, Docket No. R-2024-3046932
111. Aqua Pennsylvania Water, Inc. and Aqua Pennsylvania Wastewater, Inc., Docket Nos. R-2024-3047822 and R-2024-3047824
112. Application of Aqua America Wastewater, Inc. et al., Acquisition of the Wastewater System Assets of Beaver Falls, Docket No. A-202-3033138
113. Pike County Light and Power Company (Gas), Docket No. R-2024-3052357
114. UGI Utilities, Inc. – Gas Division, Docket No. R-2024-3052716
115. Philadelphia Gas Works, Docket No. R-2025-3053112
116. Citizens' Electric Company of Lewisburg, Pa, Docket No. R-2025-3054394
117. Wellsboro Electric Company, Docket No. R-2025-3054392
118. Pittsburgh Water and Sewer Authority, Docket No. R-2025-3055010, R-2025-3055011, and R-2025-3055012
119. Section 529 Investigation of Rock Spring Water Company, Docket No. P-2024-3051313
120. Energy Center Harrisburg LLC, Docket. No. R-2025-3055959
121. PPL Electric Utilities Corporation, Docket No. R-2025-3057164
122. Pennsylvania-American Water Company, Docket Nos. R-2025-3057983 and R-2025-3058051
123. Section 529 Investigation of Conneaut Lake Park Water Corporation, Inc., Docket Nos. P-2024-3051855 and I-2024-3051857
124. R-2025-3059523 UGI Utilities, Inc. – Gas Division

I&E Exhibit No. 3
Witness: Ethan H. Cline

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

Docket No. R-2026-3059428

Exhibit to Accompany

the

Direct Testimony

of

Ethan H. Cline

Bureau of Investigation and Enforcement

Concerning:

Fully Projected Future Test Year Reporting Requirements
Weather Normalization Adjustment
Cost of Service Study
Scale Back of Rates

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ending October 31, 2027
SCHEDULE 5 – COST OF SERVICE AND RATE OF RETURN UNDER PRESENT AND PROPOSED RATES
($ in thousands)

Line No.	Revenue Requirement Summary	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
1	**Rate Base**										
2	Plant in Service	$ 957,237	$ 625,096	$ 38,292	$ 58,744	$ 115,191	$ 2,234	$ 2,343	$ 51,795	$ 26,048	$ 37,495
3	Accumulated Reserve	(320,571)	(215,012)	(13,165)	(19,675)	(35,504)	(696)	(790)	(16,095)	(8,162)	(11,472)
4	Other Rate Base Items	(65,085)	(42,116)	(2,563)	(3,873)	(8,050)	(140)	(147)	(3,661)	(1,860)	(2,676)
5	**Total Rate Base**	**$ 571,582**	**$ 367,968**	**$ 22,564**	**$ 35,196**	**$ 71,637**	**$ 1,398**	**$ 1,406**	**$ 32,040**	**$ 16,026**	**$ 23,347**
6	**Rate of Return Under Current ROR**										
7	**Revenue at Current Rates**										
8	Gas Service Revenue	$ 136,735	$ 97,367	$ 6,819	$ 6,989	$ 13,908	$ 131	$ 444	$ 5,876	$ 2,730	$ 2,470
9	Gas Cost	124,571	100,820	6,010	7,790	6,609	398	364	2,175	229	176
10	Other Revenues	4,219	3,319	167	209	271	8	10	116	50	69
11	**Total Revenue**	**$ 265,524**	**$ 201,507**	**$ 12,996**	**$ 14,988**	**$ 20,788**	**$ 537**	**$ 817**	**$ 8,167**	**$ 3,010**	**$ 2,715**
12	**Expenses at Current Rates**										
13	O&M and A&G Expenses	$ 204,276	$ 159,720	$ 9,625	$ 11,971	$ 13,020	$ 511	$ 564	$ 5,035	$ 1,640	$ 2,190
14	Depreciation and Amortization Expense	25,074	16,855	1,049	1,555	2,768	58	64	1,229	612	884
15	Taxes Other Than Income	2,490	1,692	114	160	256	5	7	115	58	83
16	**Total Operating Expenses**	231,839	178,267	10,788	13,685	16,044	574	635	6,379	2,310	3,158
17	**Earnings Before Interest and Taxes**	**33,684**	**23,240**	**2,208**	**1,302**	**4,743**	**(37)**	**182**	**1,788**	**700**	**(443)**
18	Current Federal/State Income Taxes	(1,653)	(1,140)	(108)	(64)	(233)	2	(9)	(88)	(34)	22
19	Deferred Income Tax	(687)	(449)	(27)	(42)	(83)	(2)	(2)	(37)	(19)	(27)
20	**Total Income Taxes**	**(2,340)**	**(1,589)**	**(136)**	**(106)**	**(315)**	**0**	**(11)**	**(125)**	**(53)**	**(5)**
21	**Total Expenses at Current Rates**	**$ 229,499**	**$ 176,678**	**$ 10,652**	**$ 13,579**	**$ 15,729**	**$ 574**	**$ 624**	**$ 6,254**	**$ 2,257**	**$ 3,153**
22	**Operating Income at Current Rates**	**$ 36,024**	**$ 24,829**	**$ 2,344**	**$ 1,408**	**$ 5,059**	**$ (37)**	**$ 193**	**$ 1,913**	**$ 753**	**$ (438)**
23	**Current Rate of Return**	**6.30%**	**6.75%**	**10.39%**	**4.00%**	**7.06%**	**-2.65%**	**13.72%**	**5.97%**	**4.70%**	**-1.87%**
24	**Relative Rate of Return**	**1.00**	**1.07**	**1.65**	**0.63**	**1.12**	**(0.42)**	**2.18**	**0.95**	**0.75**	**(0.30)**

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ending October 31, 2027
SCHEDULE 5 – COST OF SERVICE AND RATE OF RETURN UNDER PRESENT AND PROPOSED RATES
($ in thousands)

Line No.	Revenue Requirement Summary	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
25	**Rate of Return Under Proposed ROR**										
26	**Revenue at Proposed ROR**										
27	Gas Service Revenue	$ 156,400	$ 112,771	$ 7,702	$ 7,893	$ 15,249	$ 152	$ 487	$ 6,443	$ 2,994	$ 2,709
28	Gas Cost	$ 124,571	$ 100,820	$ 6,010	$ 7,790	$ 6,609	$ 398	$ 364	$ 2,175	$ 229	$ 176
29	Other Revenues	$ 4,234	$ 3,331	$ 167	$ 210	$ 272	$ 8	$ 10	$ 116	$ 51	$ 69
30	**Total Revenue**	**$ 285,204**	**$ 216,922**	**$ 13,879**	**$ 15,893**	**$ 22,131**	**$ 558**	**$ 860**	**$ 8,734**	**$ 3,274**	**$ 2,954**
31	**Expenses at Required Return**										
32	O&M and A&G Expenses	204,276	159,720	9,625	11,971	13,020	511	564	5,035	1,640	2,190
33	Depreciation and Amortization Expense	25,379	17,144	1,056	1,558	2,769	58	65	1,232	613	884
34	Taxes Other Than Income	2,490	1,692	114	160	256	5	7	115	58	83
35	**Total Operating Expenses**	**232,144**	**178,556**	**10,795**	**13,688**	**16,045**	**574**	**636**	**6,381**	**2,310**	**3,158**
36	Current Federal/State Income Taxes	3,562	2,572	206	149	409	(1)	15	158	65	(12)
37	Deferred Income Tax	(687)	(449)	(27)	(42)	(83)	(2)	(2)	(37)	(19)	(27)
38	**Income Taxes and Other**	**2,875**	**2,124**	**179**	**107**	**326**	**(3)**	**13**	**121**	**46**	**(39)**
39	**Total Expenses at Required Return**	**$ 235,019**	**$ 180,680**	**$ 10,974**	**$ 13,795**	**$ 16,371**	**$ 571**	**$ 650**	**$ 6,502**	**$ 2,356**	**$ 3,119**
40	**Operating Income at Equal ROR**	50,185	36,242	2,905	2,098	5,759	(13)	211	2,232	917	(166)
41	**Current Rate of Return**	**8.78%**	**9.85%**	**12.88%**	**5.96%**	**8.04%**	**-0.96%**	**14.97%**	**6.97%**	**5.72%**	**-0.71%**
42	**Relative Rate of Return**	**1.00**	**1.12**	**1.47**	**0.68**	**0.92**	**(0.11)**	**1.71**	**0.79**	**0.65**	**(0.08)**

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ending October 31, 2027
I&E RECOMMENDED COST OF SERVICE AND RATE OF RETURN UNDER PRESENT AND PROPOSED RATES
($ in thousands)

Line No.	Revenue Requirement Summary	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
1	**Rate Base**										
2	Plant in Service	$ 957,237	$ 625,096	$ 38,292	$ 58,744	$ 115,191	$ 2,234	$ 2,343	$ 51,795	$ 26,048	$ 37,495
3	Accumulated Reserve	(320,571)	(215,012)	(13,165)	(19,675)	(35,504)	(696)	(790)	(16,095)	(8,162)	(11,472)
4	Other Rate Base Items	(65,085)	(42,116)	(2,563)	(3,873)	(8,050)	(140)	(147)	(3,661)	(1,860)	(2,676)
5	**Total Rate Base**	**$ 571,582**	**$ 367,968**	**$ 22,564**	**$ 35,196**	**$ 71,637**	**$ 1,398**	**$ 1,406**	**$ 32,040**	**$ 16,026**	**$ 23,347**
6	**Rate of Return Under Current ROR**										
7	**Revenue at Current Rates**										
8	Gas Service Revenue	$ 136,735	$ 97,367	$ 6,819	$ 6,989	$ 13,908	$ 131	$ 444	$ 5,876	$ 2,730	$ 2,470
9	Gas Cost	124,571	100,820	6,010	7,790	6,609	398	364	2,175	229	176
10	Other Revenues	4,219	3,319	167	209	271	8	10	116	50	69
11	**Total Revenue**	**$ 265,524**	**$ 201,507**	**$ 12,996**	**$ 14,988**	**$ 20,788**	**$ 537**	**$ 817**	**$ 8,167**	**$ 3,010**	**$ 2,715**
12	**Expenses at Current Rates**										
13	O&M and A&G Expenses	$ 204,276	$ 159,720	$ 9,625	$ 11,971	$ 13,020	$ 511	$ 564	$ 5,035	$ 1,640	$ 2,190
14	Depreciation and Amortization Expense	25,074	16,855	1,049	1,555	2,768	58	64	1,229	612	884
15	Taxes Other Than Income	2,490	1,692	114	160	256	5	7	115	58	83
16	**Total Operating Expenses**	231,839	178,267	10,788	13,685	16,044	574	635	6,379	2,310	3,158
17	**Earnings Before Interest and Taxes**	**33,684**	**23,240**	**2,208**	**1,302**	**4,743**	**(37)**	**182**	**1,788**	**700**	**(443)**
18	Current Federal/State Income Taxes	(1,653)	(1,140)	(108)	(64)	(233)	2	(9)	(88)	(34)	22
19	Deferred Income Tax	(687)	(449)	(27)	(42)	(83)	(2)	(2)	(37)	(19)	(27)
20	**Total Income Taxes**	**(2,340)**	**(1,589)**	**(136)**	**(106)**	**(315)**	**0**	**(11)**	**(125)**	**(53)**	**(5)**
21	**Total Expenses at Current Rates**	**$ 229,499**	**$ 176,678**	**$ 10,652**	**$ 13,579**	**$ 15,729**	**$ 574**	**$ 624**	**$ 6,254**	**$ 2,257**	**$ 3,153**
22	**Operating Income at Current Rates**	**$ 36,024**	**$ 24,829**	**$ 2,344**	**$ 1,408**	**$ 5,059**	**$ (37)**	**$ 193**	**$ 1,913**	**$ 753**	**$ (438)**
23	**Current Rate of Return**	**6.30%**	**6.75%**	**10.39%**	**4.00%**	**7.06%**	**-2.65%**	**13.72%**	**5.97%**	**4.70%**	**-1.87%**
24	**Relative Rate of Return**	**1.00**	**1.07**	**1.65**	**0.63**	**1.12**	**(0.42)**	**2.18**	**0.95**	**0.75**	**(0.30)**

National Fuel Gas Distribution Corporation
Gas Class Cost of Service Study
Test Year Ending October 31, 2027
I&E RECOMMENDED COST OF SERVICE AND RATE OF RETURN UNDER PRESENT AND PROPOSED RATES
($ in thousands)

Line No.	Revenue Requirement Summary	Account Balance	Residential Service	Small Commercial & PA Service (LE 250)	Small Commercial & PA Service (GT 250)	Large Comm PA Service	NGV	SVIS	IVIS	LVIS	LIS
25	**Rate of Return Under Proposed ROR**										
26	**Revenue at Proposed ROR**										
27	Gas Service Revenue	$ 156,400	$ 110,417	$ 7,619	$ 8,389	$ 16,107	$ 157	$ 444	$ 7,026	$ 3,270	$ 2,970
28	Gas Cost	$ 124,571	$ 100,820	$ 6,010	$ 7,790	$ 6,609	$ 398	$ 364	$ 2,175	$ 229	$ 176
29	Other Revenues	$ 4,234	$ 3,331	$ 167	$ 210	$ 272	$ 8	$ 10	$ 116	$ 51	$ 69
30	**Total Revenue**	**$ 285,204**	**$ 214,568**	**$ 13,797**	**$ 16,388**	**$ 22,988**	**$ 563**	**$ 817**	**$ 9,317**	**$ 3,550**	**$ 3,215**
31	**Expenses at Required Return**										
32	O&M and A&G Expenses	204,276	159,720	9,625	11,971	13,020	511	564	5,035	1,640	2,190
33	Depreciation and Amortization Expense	25,379	17,144	1,056	1,558	2,769	58	65	1,232	613	884
34	Taxes Other Than Income	2,490	1,692	114	160	256	5	7	115	58	83
35	**Total Operating Expenses**	**232,144**	**178,556**	**10,795**	**13,688**	**16,045**	**574**	**636**	**6,381**	**2,310**	**3,158**
36	Current Federal/State Income Taxes	3,562	2,572	206	149	409	(1)	15	158	65	(12)
37	Deferred Income Tax	(687)	(449)	(27)	(42)	(83)	(2)	(2)	(37)	(19)	(27)
38	**Income Taxes and Other**	**2,875**	**2,124**	**179**	**107**	**326**	**(3)**	**13**	**121**	**46**	**(39)**
39	**Total Expenses at Required Return**	**$ 235,019**	**$ 180,680**	**$ 10,974**	**$ 13,795**	**$ 16,371**	**$ 571**	**$ 650**	**$ 6,502**	**$ 2,356**	**$ 3,119**
40	**Operating Income at Equal ROR**	50,185	33,888	2,823	2,593	6,616	(8)	168	2,815	1,194	96
41	**Current Rate of Return**	**8.78%**	**9.21%**	**12.51%**	**7.37%**	**9.24%**	**-0.59%**	**11.93%**	**8.79%**	**7.45%**	**0.41%**
42	**Relative Rate of Return**	**1.00**	**1.05**	**1.42**	**0.84**	**1.05**	**(0.07)**	**1.36**	**1.00**	**0.85**	**0.05**

I&E Statement No. 3-SR
Witness: Ethan H. Cline

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

Docket No. R-2026-3059428

Surrebuttal Testimony

of

Ethan H. Cline

Bureau of Investigation and Enforcement

Concerning:

Fully Projected Future Test Year Reporting Requirements
Weather Normalization Adjustment
Cost of Service Study
Scale Back of Rates

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Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Ethan H. Cline. My business address is Pennsylvania Public Utility Commission, 400 North Street, Harrisburg, PA 17120.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by the Pennsylvania Public Utility Commission in the Bureau of Investigation and Enforcement (I&E) as a Fixed Utility Valuation Engineer.

Q. ARE YOU THE SAME ETHAN H. CLINE THAT SUBMITTED I&E STATEMENT NO. 3 AND I&E EXHIBIT NO. 3?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. The purpose of my surrebuttal testimony is to respond to the rebuttal testimony submitted by witnesses on behalf of National Fuel Gas Distribution Company (NFG or Company) by: Rebecca E. Hillery[1], Cathryn E. Hilliard[2], and John D. Taylor[3]. I will also respond to the rebuttal testimony submitted on behalf of the Office of Consumer Advocate (OCA) witness Michael Deupree[4] and Office of Small Business Advocate (OSBA) witness Justin B. Farr[5].

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[1] NFG Statement No. 1-R.
[2] NFG Statement No. 13-R.
[3] NFG Statement No. 19-R.
[4] OCA Statement No. 1R.
[5] OSBA Statement No. 1-R.

Q. DOES YOUR SURREBUTTAL TESTIMONY INCLUDE AN EXHIBIT?

A. No.

FULLY PROJECTED FUTURE TEST YEAR (FPFTY) REPORTING REQUIREMENTS

Q. DID YOU HAVE ANY RECOMMENDATIONS REGARDING PLANT ADDITIONS THAT NFG PROJECTS TO BE IN SERVICE DURING THE FTY ENDING SEPTEMBER 30, 2026, AND THE FPFTY ENDING OCTOBER 31, 2027?

A. Yes. I recommended that the Company provide I&E and the OCA with an update to NFG Exhibit A – Revenue Requirement - FTY, Sch. C-2 no later than February 1, 2027, under this docket number, which should include actual capital expenditures, plant additions, and retirements by month for the twelve months ending September 30, 2026. An additional update to NFG Exhibit A – Revenue Requirement FPFTY, Sch. C-2 should be provided for actuals through October 31, 2027, no later than February 1, 2028.[6]

[6] I&E Statement No. 3, p. 3.

Q. DID THE COMPANY RESPOND TO YOUR RECOMMENDATION?

A. Yes. The Company stated that, if directed by the Commission or otherwise required in this proceeding, it will provide an update of actual plant balances for the FTY and FPFTY through October 31, 2027.[7]

WEATHER NORMALIZATION ADJUSTMENT (WNA)

Q. WHAT DID THE COMPANY PROPOSE REGARDING ITS WNA?

A. The Company proposed to calculate its Normal HDDs based on ten years of National Oceanic and Atmospheric Administration (NOAA) weather data.

Q. DID YOU OPPOSE THE COMPANY'S PROPOSAL TO CALCULATE ITS NORMAL HDDS BASED ON TEN YEARS OF WEATHER DATA?

A. No.[8]

Q. DID YOU RECOMMEND ANY CHANGES TO THE WNA AS IT IS PROPOSED BY THE COMPANY?

A. Yes. I recommended that the shoulder month of May be excluded from the calculation of the WNA and that the deadband be increased to 5%.[9]

[7] NFG Statemen No. 6-R, p. 5.
[8] I&E Statement No. 3, p. 6.
[9] I&E Statement No. 3, p. 6.

Q. DID THE COMPANY RESPOND TO YOUR RECOMMENDATION?

A. Yes. The Company opposed both of my recommendations regarding the WNA.

Q. WHY DID THE COMPANY OPPOSE YOUR RECOMMENDATION TO REMOVE THE SHOULDER MONTH OF MAY FROM THE WNA CALCULATION?

A. The Company claimed that due to a part of NFG's service territory's proximity to Lake Erie, its customers experience lower average temperatures in May than other areas of Pennsylvania and that can lead to increased weather-driven bill volatility.[10]

Q. WHAT IS THE HISTORY OF THE WNA IN THE MONTH OF MAY FOR NFG CUSTOMERS?

A. NFG witness Hillery provided a table reflecting the heating season by year which shows the WNA credit or surcharge by month for the 2023-2024, 2024-2025, and 2025-2026 (for the months available) heating seasons. This table shows that NFG customers were charged an additional $1,078,972 in the 2023-2024 heating season and, by contrast, only $48,505 in the 2024-2025 heating season, while data for the 2025-2026 heating season is not yet available. This data shows that May weather

[10] NFG Statement No. 1-R, p. 9 and NFG Statement No. 19-R, p. 39.

is highly variable from year to year and warrants the classification of a shoulder month and removal from the WNA calculation.

Q. WHY DID THE COMPANY OPPOSE YOUR RECOMMENDATION TO INCREASE THE DEADBAND FROM 3% TO 5%?

A. NFG witness Taylor claimed that limiting the WNA would materially weaken the mechanism and reintroduce volatility into revenue recovery for both the Company and customers. He further pointed to the $2.6 million net WNA credits from the most recent heating season (October 2025 through March 2026) as an example of a customer benefit of the WNA and claimed that increasing the deadband to 5% would have resulted in fewer credits returned to customers.[11]

Q. DO YOU AGREE THAT A SINGLE YEAR OF WNA CREDITS IS SUFFICIENT SUPPORT TO DENY A 5% DEADBAND?

A. No. First, a single year of data does nothing to support changing the Commission's determination, as I stated in my direct testimony, that a 5% deadband adequately captures what could be determined as normal weather fluctuations in Pennsylvania.[12] Furthermore, while the most recent heating season did result in a net credit to customers, the previous two heating seasons resulted in a net charge to customers of $6,920,194 (2023-2024) and $2,186,781 (2024-2025)

[11] NFG Statement No. 19-R, pp. 37-38.
[12] I&E Statement No. 3, p. 7.

which shows that the WNA is not the benefit to customers that NFG claims it to be.

Q. DO YOU WISH TO CHANGE YOUR RECOMMENDATION?

A. No. As discussed above, the Company has provided no meaningful support that would result in a change in my recommendation. Therefore, I continue to recommend that the shoulder month of May be removed from the WNA calculation and the deadband be increased from 3% to 5%.

COST OF SERVICE

Q. DID THE COMPANY PROVIDE AN ACOSS IN THIS PROCEEDING?

A. Yes. The Company performed two ACOSS in this case. The first, using the customer-demand method, is the ACOSS that the Company is proposing be used to allocate costs in this case where the cost of mains are allocated as 61% customer-related and 39% as demand-related. The second ACOSS performed by the Company was based on the Peak and Average method, with no customer component, was provided for informational and comparison purposes.[13]

[13] I&E Statement No. 3, p. 9.

Q. WHAT DID YOU RECOMMEND REGARDING THE ACOSS?

A. I recommended that the Commission allocate revenues and design rates based on the Peak and Average ACOSS provided by the Company. The basis for my recommendation is the long-standing Commission preference for the Peak and Average methodology for allocating natural gas costs.[14]

Q. DID THE PARTIES RESPOND TO YOUR RECOMMENDATION?

A. Yes. NFG witness Taylor disagreed with my recommendation based on his continued support for the customer-demand methodology.[15] OSBA witness Farr similarly disagreed with my recommendation due to a preference for the customer-demand methodology but proposed a hybrid methodology instead.[16] OCA witness Deupree agrees that the customer-demand methodology is flawed and should be rejected while supporting his own alternative ACOSS which is also based on the Peak and Average methodology.[17]

[14] I&E Statement No. 3, pp. 9-10.
[15] NFG Statement no. 19-R, pp. 6-7.
[16] OSBA Statement No. 1-R, pp. 1-2.
[17] OCA Statement No. 1R, pp. 10-11.

Q. DID NFG AGREE WITH YOUR POSITION THAT COMMISSION PRECEDENT IS IN SUPPORT OF THE PEAK AND AVERAGE ACOSS METHODOLOGY?

A. Yes. However, Mr. Taylor claimed that the use of Peak and Average ACOSS methodology is "utilizing cost causation with no concern for the resulting impact on class rates" then cited to a State of Connecticut – Department of Public Utility Control decision dated August 9, 2000 that supported the customer-demand ACOSS methodology.[18] The implication of Mr. Taylor's reference is that support of the Peak and Average Methodology by the Commission can only be because of some social policy and not cost causation principles. Mr. Taylor provided no background information as to why the Connecticut Commission used this language in its ruling. Without this important information, Mr. Taylor's supposition that the Commission only prefers the Peak and Average ACOSS due to social policy is without merit. As I stated in my direct testimony, the Commission determined that "the basic reason Columbia invests in its distribution system is to meet the annual demands for gas by customers."[19] NFG invests in its distribution system for the same reasons and, therefore, the Commission should maintain its precedent that the costs of the NFG system should be allocated using a Peak and Average Methodology.

[18] NFG Statement No. 19-R, pp. 18-19.
[19] I&E Statement No. 3, p. 10.

Q. DID THE COMPANY REFERENCE ANY OTHER JURISDICTIONS THAT REPORTEDLY SUPPORT THE CUSTOMER-DEMAND ACOSS METHODOLOGY?

A. Yes. Mr. Taylor indicated that there are 44 state utility regulatory commissions (including Washington D.C.) that rely upon the results of an embedded cost of service study for ratemaking purposes and that 26 of those 44 prefer the customer-demand methodology.[20]

Q. DOES THE EXISTENCE OF A NUMBER OF STATE UTILITY REGULATORY COMMISSIONS THAT PREFER A CUSTOMER-DEMAND ACOSS METHODOLOGY SUPERCEDE THE PENNSYLVANIA COMMISSION'S LONG-STANDING PRECEDENT?

A. No. The Pennsylvania Commission has long determined that the Peak and Average ACOSS is the methodology that leads to the most just and reasonable rates for Pennsylvania customers. The fact that other states may have other preferences has no bearing on this proceeding. However, as I am not a lawyer, this issue will be addressed more fully in the I&E briefs on this topic.

[20] NFG Statement No. 19-R, p. 19.

Q. WHAT IS THE OSBA RECOMMENDING REGARDING COST ALLOCATION?

A. In its direct testimony, the OSBA supported the Company's customer-demand ACOSS. In rebuttal testimony, after disagreeing with the Peak and Average ACOSS methodology, OSBA witness Farr recommended a hybrid ACOSS methodology which assigned 30.5% of the weight to customer-related costs and the remaining 69.5% determined using the Peak and Average method proposed by the OCA.[21]

Q. DO YOU AGREE WITH THE OSBA'S PROPOSED HYBRID METHODOLOGY?

A. No. Allocating any part of the cost of mains based on the number of customers is not reasonable and, therefore, the OSBA's proposed hybrid methodology should be rejected.

Q. DID THE OCA SUPPORT YOUR RECOMMENDED PEAK AND AVERAGE ACOSS?

A. No. While the OCA did agree with my support for the Peak and Average ACOSS, OCA witness Deupree continues to support the Peak and Average ACOSS that he

[21] OSBA Statement No. 1-R, pp. 1-2.

submitted with his direct testimony.[22] Mr. Deupree's main disagreement with my position is regarding allocation, which I will discuss further below.

Q. DO YOU OPPOSE MR. DEUPREE'S ALTERNATIVE PEAK AND AVERAGE ACOSS?

A. No. While I continue to recommend the Peak and Average ACOSS as I proposed in my direct testimony, I do not oppose the alternative ACOSS proposed by Mr. Deupree because it is also based on the Peak and Average ACOSS.

REVENUE ALLOCATION

Q. DID YOU RECOMMEND AN ADJUSTMENT TO THE COMPANY'S PROPOSED REVENUE ALLOCATION?

A. Yes. The Company's proposed revenue allocation is based upon its customer-demand ACOSS. As I recommended the Commission reject the proposed customer-demand ACOSS in favor of the Peak and Average ACOSS, I also recommended the proposed allocation based on that model be rejected in favor of an allocation based on the Peak and Average ACOSS.[23]

[22] OCA Statement No. 1R, p. 11.
[23] I&E Statement No. 3, p. 11.

Q. WHAT REVENUE ALLOCATION DID YOU RECOMMEND?

A. The revenue allocation I am recommending, based on the Peak and Average ACOSS, is shown in the table below[24]:

I&E Recommended Revenue Allocation Based on NFG As-Filed Increase ($ in thousands)					
Rate Class	Current Revenues	Increase	Proposed Revenues	Percent Increase	Relative ROR under proposed rates
Residential	$97,367	$13,050	$110,417	13%	1.05
SCPA-LL	$6,819	$800	$7,619	12%	1.42
SCPA-UL	$6,989	$1,400	$8,389	20%	0.84
LCPA	$13,908	$2,199	$16,107	16%	1.05
NGV	$131	$26	$157	20%	(0.07)
SVIS	$444	$0	$444	0%	1.36
IVIS	$5,876	$1,150	$7,076	20%	1.00
LVIS	$2,730	$540	$3,270	20%	0.85
LIS	$1,416	$500	$2,970	20%	0.05
Total:	$136,735	$19,665	$156,400	14%	

Q. DID ANY PARTIES DISAGREE WITH YOUR REVENUE ALLOCATIONS?

A. Yes. NFG and the OSBA did not specifically address my allocation, however their opposition can be inferred based on the underlying ACOSS methodology

[24] I&E Statement No. 3, p. 12.

choices as I discussed above. Also, the OCA disagreed with my allocation recommendation due to concerns regarding gradualism.

Q. WHAT IS THE BASIS FOR THE OCA'S CONCERNS REGARDING GRADUALISM?

A. OCA witness Deupree claimed that my allocation recommendation to limit the revenue allocations to 1.5 times the system average increase is inconsistent with the concept of gradualism and instead proposes capping the under-earning rate classes to no more than 1.15 times the system average increase.[25]

Q. IS A LIMIT OF 1.5 TIMES THE SYSTEM AVERAGE INCREASE INCONSISTENT WITH THE CONCEPT OF GRADUALISM?

A. No. In my experience, 1.5 times the system average increase has been considered consistent with the concept of gradualism.

Q. DO YOU OPPOSE THE OCA'S PROPOSAL REGARDING COST ALLOCATION?

A. No. Considering the OCA's cost allocation proposal, alongside my proposal, provides a reasonable range for customer class increases.

[25] OCA Statement No. 1R, pp. 10-11.

CUSTOMER COST ANALYSIS

Q. WHAT DID YOU RECOMMEND REGARDING THE BASIC SERVICE CHARGES PROPOSED BY THE COMPANY?

A. As I described in my direct testimony, NFG did not provide a customer cost analysis based on the Peak and Average ACOSS. As such, the basic service charge increases proposed by the Company are unsupported. Therefore, I recommended the Commission limit the increase in basic service charges proposed by the Company to approximately the same class percent increase unless and until they are supported by an appropriate customer cost analysis.[26]

Q. DID THE COMPANY PROVIDE A TRADITIONAL CUSTOMER COST ANALYSIS IN ITS REBUTTAL TESTIMONY?

A. No. However, Mr. Taylor claimed that the $27.17 reflected in the Company's ACOSS does not include distribution mains investment.[27]

Q. DO YOU WISH TO CHANGE YOUR RECOMMENDATION?

A. No. Without a traditional customer cost analysis, the Company's proposed customer costs are unsupported and should be limited to approximately their respective class increases.

[26] I&E Statement No. 3, pp. 14-15.
[27] NFG Statement No. 19-R, pp. 23-24.

SCALE BACK OF RATES

Q. WHAT DID YOU RECOMMEND IF THE COMMISSION GRANTS LESS THAN THE $19.7 MILLION REVENUE INCREASE REQUESTED BY THE COMPANY?

A. If the Commission grants less than the $19.7 million revenue increase requested by the Company, I recommended the requested rates, including the proposed customer charges, be scaled back proportionately based upon the cost of service study ultimately approved by the Commission.[28]

Q. DID ANY PARTY DISAGREE WITH YOUR RECOMMENDATION?

A. Yes. NFG witness Taylor opposed my recommendation because "[s]caling back the customer charge merely to match a reduced revenue requirement would disconnect the rate design from cost causation principles and potentially results in an under-recovery of fixed costs." Mr. Taylor also cited NARUC's gas design manual's statement that "Ideally, the customer charge should recover all customer costs." [29]

[28] I&E Statement No. 3, p. 16.
[29] NFG Statement No. 19-R, pp. 24-25.

Q. PLEASE RESPOND TO MR. TAYLOR'S TESTIMONY REGARDING INCLUDING THE CUSTOMER CHARGE IN THE SCALE BACK OF RATES.

A. A delicate balance exists in rate design between the revenue stability and fixed cost recovery (the Company) and affordability and conservation efforts (customers). Even Mr. Taylor references the "ideal" world. In the real world, I believe that including the customer charge in the scale back of rates is an effective means of recognizing the interests of both the Company and customers. Therefore, I continue to recommend the customer charges that receive an increase be included in any scale back of rates.

Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

A. Yes. However, I reserve the right to supplement my testimony or to revise recommendations if additional issues or facts arise during this proceeding.

I&E Statement No. 4
Witness: Jesse Burkett
NON-PROPRIETARY

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

National Fuel Gas Distribution Corp.

Docket No. R-2025-3059428

Direct Testimony

of

Jesse M. Burkett

Bureau of Investigation and Enforcement

Concerning:

PIPELINE REPLACEMENT
METHANE DETECTOR PILOT PROGRAM

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INTRODUCTION

Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.

A. My name is Jesse M. Burkett. I am a Civil Engineer (General) in the Pipeline Safety Division of the Pennsylvania Public Utility Commission's (Commission) Bureau of Investigation and Enforcement (I&E). My business address is Pennsylvania Public Utility Commission, 400 North Street, Harrisburg, PA 17120.

Q. WHAT IS YOUR EDUCATION AND EMPLOYMENT EXPERIENCE?

A. I attended Pennsylvania State University and earned a Bachelor of Science Degree in Applied Materials Engineering in 2021. I joined the Commonwealth of Pennsylvania Department of Transportation in June of 2021, conducting federal and state bridge safety inspections until my transition in July of 2022 to the Commission's Pipeline Safety Division. In addition to experience gained while on the job, I have also taken 41 courses required by the United States Pipeline and Hazardous Materials and Safety Administration (PHMSA) for inspector certification.

Q. WHAT ARE YOUR MAJOR DUTIES AS AN ENGINEER IN THE PIPELINE SAFETY DIVISION?

A. My major duties include the inspection of natural gas infrastructure, including pipeline operation, construction, and maintenance, to ensure compliance with the

Pipeline and Hazardous Materials Safety Administration's (PHMSA) federal safety regulations and the Commission's applicable regulations including Title 52, Chapter 59 of the Pennsylvania Code. On average, I conduct over 120 inspections per year.

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A. The purpose of my direct testimony is to address National Fuel Gas Distribution Corporation's (NFG or Company) pipeline replacement and restoration activities in relation to system maintenance and improvements. In addition, my testimony will highlight the usefulness and safety benefits of methane detectors within structures and the ability of real-time smart reporting technology to simultaneously notify the customer and the emergency gas response officials to potentially hazardous situations.

Q. DOES YOUR TESTIMONY INCLUDE AN EXHIBIT?

A. Yes. I&E Exhibit No. 4 contains schedules that support my direct testimony.

Q. PLEASE DESCRIBE THE ROLE OF I&E IN RATE PROCEEDINGS.

A. I&E is responsible for protecting the public interest in proceedings before the Commission. The I&E analysis in this proceeding is based on its responsibility to represent the public interest. This responsibility requires the balancing of the

interests of ratepayers, the regulated utility, and the regulated community as a whole.

Q. DID ANY COMPANY WITNESSES PROVIDE DIRECT TESTIMONY ON NFG'S PIPELINE REPLACEMENT?

A. Yes, NFG witnesses Schaefer[1] and Scouten[2], each discuss the Company's plans for Pipeline Replacement and Integrity Management.

Q. HAVE YOU REVIEWED NFG'S PLAN TO REPLACE HIGH RISK PIPELINES?

A. Yes. Mr. Schaefer stated the Company has tried to replace Leak Prone Pipe (LPP) through its Systematic Replacement Program. The Company stated Pipeline replacement projects are prioritized using a probabilistic risk model to evaluate and rank risks associated with individual pipeline segments as well as maintaining a Pipeline Replacement and Systematic Modernization Program.[3] NFG conducts annual evaluations of its distribution system to identify and prioritize pipeline replacement projects using risk-based criteria. According to Mr. Schaefer, these criteria include leakage history, pipe material and vintage, operating environment, and relevant environmental conditions. Performance data is reviewed annually and used to evaluate whether replacement activities are achieving measurable risk

[1] NFG Statement No. 9.
[2] NFG Statement No. 16.
[3] NFG Statement No. 9. Start p. 7.

reduction. In addition, NFG's Active Corrosion Program identifies areas exhibiting active corrosion and subjects those areas to semiannual leak surveys until permanent mitigation through pipeline replacement is completed. NFG's Long Term Infrastructure Improvement Plan (LTIIP) and its success in addressing distribution infrastructure on an accelerated basis is also summarized in relation to the LPP costs.[4] The Company filed its latest LTIIP revision, under Docket No. R-2022-3035730 in December 2025. This was filed to address a large increase in LPP replacement between the 2022 filing and the end of fiscal year 2025.

Q. HAVE YOU REVIEWED NFG'S TESTIMONY ON OPERATIONAL STRUGGLES WITH INTEGRITY MANAGEMENT?

A. Yes. I reviewed Mr. Scouten's direct testimony as it relates to NFG's operational challenges, staffing, and Distribution Integrity Management Plan. According to his testimony, NFG's most significant integrity threats to the distribution system include system leaks, aging or higher-risk facilities, and third-party excavation activity. The Company indicated that third-party excavation activity is one of the most significant external threats to the integrity of the distribution system. Excavation can result in line strikes, near misses, or latent damage that may not be immediately apparent.[5] As part of the excavation damage risks, One-Call ticket

[4] NFG Statement No. 9. Start p. 3.
[5] NFG Statement No. 16. Start p. 13.

volumes increased significantly in 2025, which increased activity could result in increased excavation damage.

Additionally, fiber optics/broadband expansion projects since 2022 have significantly increased year over year, with many projects having accelerated timelines and encompassing very large areas of development. This has created additional excavation hazards with unknown third party and out-of-state contractors conducting the installation. NFG has made efforts, later highlighted, to attempt to reduce damages but not without an increase in operational expenses.

Q. WHAT FEDERAL AND STATE REGULATIONS CONTROL NFG'S PIPELINE REPLACEMENT?

A. NFG is mandated to implement a Distribution Integrity Management Program (DIMP) under Title 49, Subpart P §§ 192.1001-1015 of the Code of Federal Regulations. Additionally, utilities like NFG, which seek to continue a previously approved Distribution System Improvement Charge (DSIC) mechanism, are required to submit an LTIIP pursuant to 52 Pa Code §121.1 and §121.3.

Q. WHY MUST A NATURAL GAS DISTRIBUTION COMPANY COMPLY WITH THE DIMP REGULATIONS?

A. PHMSA created DIMP regulations to reduce the number of U.S. Department of

Transportation (U.S. DOT) Reportable Incidents.[6] DIMP is a performance based regulatory program required of gas distribution operators and is driven by risk management.

Q. WHY MUST A NATURAL GAS DISTRIBUTION COMPANY FILE AN LTIIP?

A. A natural gas distribution company must submit an LTIIP for Commission approval to be eligible to recover the reasonable and prudently incurred costs related to the repair, improvement, and replacement of eligible property through the DSIC. The LTIIP is intended to address the planned acceleration of the replacement of aging infrastructure by the utility and be sufficient to ensure and maintain adequate, efficient, safe, reliable, and reasonable service to customers.[7]

Q. WHAT ARE THE REQUIREMENTS OF A DIMP?

A. DIMP requires gas distribution pipeline operators to:

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[6] Under 49 CFR § 191.3, a PHMSA Reportable Incident is defined as any of the following events:
(1) An event that involves a release of gas from a pipeline, gas from an underground natural gas storage facility (UNGSF), liquefied natural gas, liquefied petroleum gas, refrigerant gas, or gas from an LNG facility, and that results in one or more of the following consequences:
(i) A death, or personal injury necessitating in-patient hospitalization;
(ii) Estimated property damage of $122,000 or more, including loss to the operator and others, or both, but excluding the cost of gas lost. For adjustments for inflation observed in calendar year 2021 onwards, changes to the reporting threshold will be posted on PHMSA's website. These changes will be determined in accordance with the procedures in appendix A to part 191.
(iii) Unintentional estimated gas loss of three million cubic feet or more.
(2) An event that results in an emergency shutdown of an LNG facility or a UNGSF. Activation of an emergency shutdown system for reasons other than an actual emergency within the facility does not constitute an incident.
(3) An event that is significant in the judgment of the operator, even though it did not meet the criteria of paragraph (1) or (2) of this definition.

[7] *See* 52 Pa. Code § 121.1.

1. Demonstrate knowledge of the gas distribution system;
2. Identify threats;
3. Evaluate and rank risks;
4. Identify and implement measures to address risk;
5. Measure performance, monitor results, and evaluate effectiveness;
6. Evaluate and improve the DIMP; and
7. Report results.[8]

DIMP requirements include the identification of threats to pipeline facilities and the requirement for operators to create plans to mitigate and reduce the risks caused by those threats. NFG uses a risk-based prioritization process called the Pipeline Replacement and Systematic Modernization Program to select replacement pipelines. NFG conducts annual evaluations of its distribution system to identify and develop risk ratings for each segment of at-risk pipeline and then replaces the pipe based on the highest risk ranking.

Q. WHAT ARE THE REQUIREMENTS OF AN LTIIP?

A. The LTIIP must include the following elements:

1. Identification of types and age of eligible property owned and operated by the utility for which it is seeking DSIC recovery.

[8] *See* 49 CFR § 192.1007.

2. An initial schedule for planned repair and replacement of eligible property.

3. A general description of location of eligible property.

4. A reasonable estimate of quantity of eligible property to be improved or repaired.

5. Projected annual expenditures and means to finance the expenditures.

6. A description of the manner in which infrastructure replacement will be accelerated and how repair, improvement, or replacement will ensure and maintain adequate, efficient, safe, reliable, and reasonable service to customers.

7. A workforce management and training program designed to ensure that the utility will have access to a qualified workforce to perform work in a cost-effective, safe, and reliable manner.

8. A description of a utility's outreach and coordination activities with other utilities, Department of Transportation, and local governments regarding the planned maintenance/construction projects and roadways that may be impacted by the LTIIP.

The LTIIP must address only the specific property eligible for DSIC recovery.[9]

[9] *See* 52 Pa. Code § 121.3.

Q. WHAT ARE THE COMMON MITIGATION MEASURES FOR HIGH-RISK PIPELINE SEGMENTS?

A. The industry's common mitigation measure to reduce pipeline risk is to replace the highest risk pipelines first. As a company replaces the pipelines calculated to represent the highest risk, the total system risk should be reduced. If enough pipe is replaced in that asset group annually to overcome the increasing risks on other segments within that group, the overall risk of the asset group will be reduced.

Q. SHOULD PIPELINE REPLACEMENT MITIGATION MEASURES BE BASED ON THE DIMP?

A. Yes. Pipeline replacement, which includes high risk wrought iron and bare steel should be based on the DIMP. The LTIIP, on the other hand, is a forward-looking plan for the replacement of DSIC eligible assets. Overall, pipeline replacement should be risk based and thus driven by the DIMP.

<u>PIPELINE REPLACEMENT EFFORTS</u>

Q. IN YOUR OPINION, WHAT ARE NFG'S RISKIEST ASSETS THAT SHOULD BE PRIORITIZED FOR REPLACEMENT?

A. In my opinion, NFG's riskiest assets are bare steel pipe. Through the direct testimony of Mr. Schaefer, bare steel pipe has presented the highest volume of

leaks, especially hazardous (Grade 1) leaks.[10] In response to these numbers, NFG has focused on increased replacement efforts in its bare steel systems.

Q. WHAT IS THE COMPANY'S STATED TIME FRAME IN THE LTIIP FOR PIPELINE REPLACEMENT?

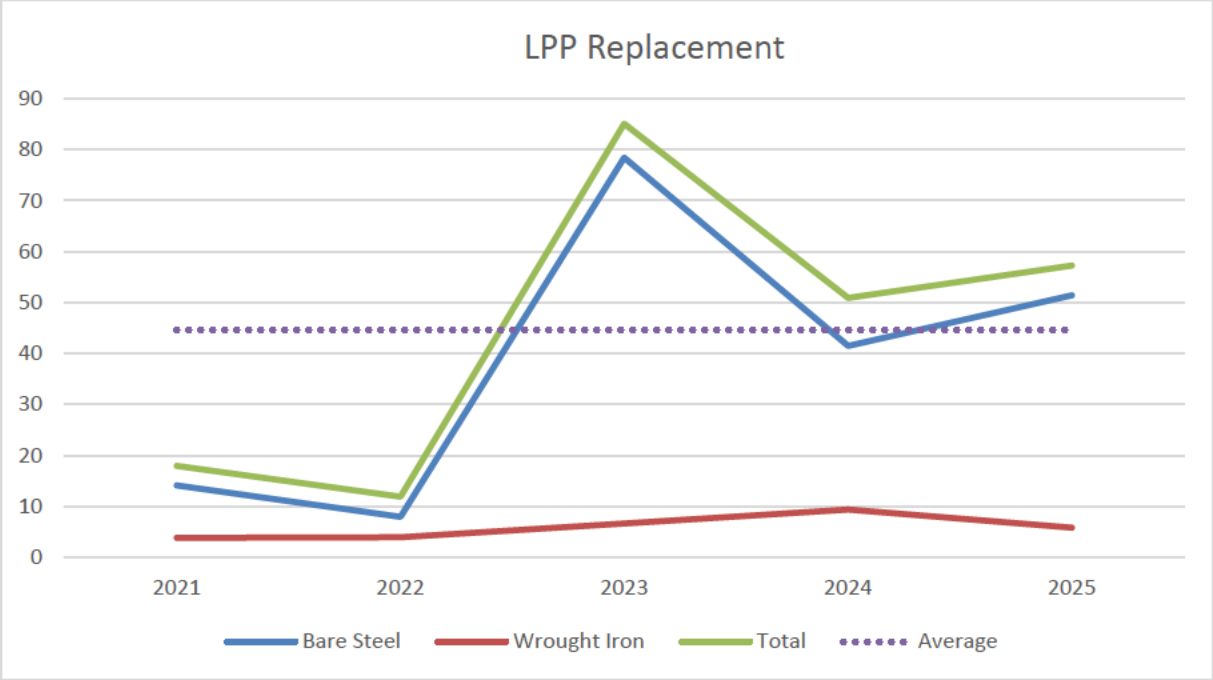
A. NFG's LTIIP states that the Company will replace all bare steel and wrought iron pipes in its system by 2039.[11] Prior to filing the LTIIP, the Company's bare steel and wrought iron replacement schedule was estimated to be complete by 2046.

Q. WHAT IS NFG's LPP PIPELINE REPLACEMENT SCHEDULE?

A. NFG reported that from calendar year end 2021 through 2025, the Company has eliminated approximately 223 miles of its leak prone bare steel and wrought iron pipelines. The graph and table below demonstrate the mileage of bare steel and wrought iron main that NFG retired over the last five years.[12]

	2021	2022	2023	2024	2025	Average
Retired Bare Steel	14.12	7.96	78.47	41.54	51.45	38.70
Retired Wrought Iron	3.84	3.95	6.66	9.39	5.86	5.94
Total	17.96	11.91	85.13	50.93	57.31	44.64

[10] Exhibit No. 4, Schedule No. 1, Interrogatories: I&E PS-2 and PS-3.
[11] NFG Statement No. 9, Start p. 13.
[12] Exhibit No. 4, Schedule No. 4, Interrogatory: I&E PS-22.
Note: The table represents numbers provided to the commission in interrogatory response and differ from some provided in the most recent LTIIP revision request.



Over those 5 years, they have replaced an average of 44.64 miles per year. At the end of 2024, the Company reported that there are 667.213 miles of bare steel[13] and 107.774 miles of wrought iron[14] remaining in its system. At this time, 2025 totals have not been provided. Based on reported mileages retired it can be extrapolated that the Company, at the end of 2025 calendar year had approximately 615.763 miles of bare steel and 101.914 miles of wrought iron remaining in its system. Based on the past average replacement schedule, NFG will replace all remaining bare steel and wrought iron mains in 17 years. This schedule appears to meet the targets of mileage replacement through 2027 but will not currently meet the LTIIP target of complete replacement by 2039.

[13] Exhibit No. 4, Schedule No. 3, Interrogatory: I&E PS-21.
[14] Exhibit No. 4, Schedule No. 4, Interrogatory: I&E PS-22.

Q. WHAT ARE NFG'S FORECASTED PIPELINE REPLACEMENT GOALS?

A. NFG's distribution pipeline replacement goals for 2026-2030 are stated to be 50 miles per year, which is an increase above the actual pipeline replacement rate of 46 miles in fiscal year 2025.[15] This includes a projected budget increase for cost per mile going from $580,000 in 2025 to $675,000 per mile by 2027.

REPLACEMENT COSTS

Q. WHAT IS INCLUDED IN NFG's PIPELINE REPLACEMENT COSTS?

A. NFG's capital costs include design/inspection, materials, construction/labor, pavement restoration, and permits but are not broken down on a per category cost basis. In response to Interrogatory, I&E PS-25, NFG provided a table that demonstrated cost per mile totals for pipeline replacement from 2021 to 2025.[16]

Q. ARE NFG'S PIPELINE REPLACEMENT COSTS INCREASING?

A. Yes. Performing an analysis on five years of cost data provided by the company in response to PS-26, the total pipeline replacement cost from 2021 to 2025 increased **[BEGIN CONFIDENTIAL]** [redacted]

[15] Exhibit No. 4, Schedule No. 5, Interrogatory: I&E PS-24.
[16] Exhibit No. 4, Schedule No. 6, Interrogatory: I&E PS-25.

[redacted]

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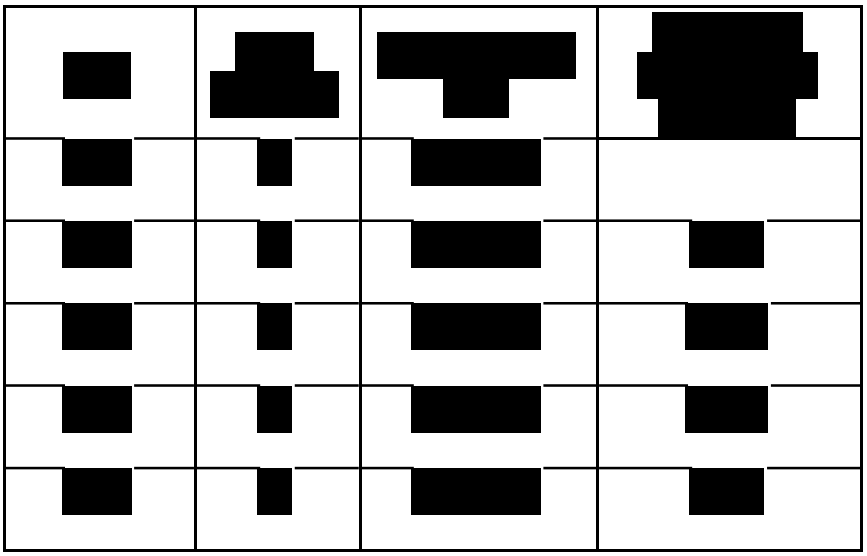


[redacted]

[END CONFIDENTIAL]

Q. DOES THE TOTAL COST FOR PIPELINE REPLACEMENT INCLUDE THE COSTS ASSOCIATED WITH TRANSMISSION ASSETS?

A. No. The dollars represented above are for distribution lines operating at less than 124 psi only. The Company indicated that these costs do not include high pressure distribution steel or transmission line replacement costs, which are budgeted for a project-by-project basis.[18]

[17] Exhibit No. 4, Schedule No. 7, Interrogatory: I&E PS-26.
[18] Exhibit No. 4, Schedule No. 7, Interrogatory: I&E PS-26.

Q. HAS THE COMPANY COMMENTED ON THE INCREASING RESTORATION COSTS?

A. Yes. NFG indicated in response to I&E-PS-31 that it has worked on reducing municipal fees since 2021 and is continuing efforts to lower these restoration costs. NFG identified municipal fee structures that it believed were inconsistent with applicable law or otherwise unreasonable and engaged with the applicable municipality to resolve those issues through negotiation, settlement, or regulatory processes.[19]

Q. DO YOU HAVE ANY RECOMMENDATIONS REGARDING NFG's MAIN REPLACEMENT COSTS AND SPECIFICALLY RESTORATION COSTS?

A. Yes. I recommend that NFG continue to take positive steps to reduce restoration costs through efforts including, but not limited to, coordinating pipe replacement projects with other street projects and replacing pipe using trenchless construction techniques where technically and economically feasible. NFG should continue to work to negotiate with state, county, and local entities to reduce restoration requirements associated with pipeline replacement.

In addition, NFG should break-down replacement costs into multiple categories and track and analyze the independent costs on items such as materials,

[19] Exhibit No. 4, Schedule No. 9, Interrogatory: I&E PS-31.

labor, restoration, permitting, etc. to better identify and negotiate potential cost savings on a project-by-project basis.

Q. WHEN CAPITAL IS UTILIZED FOR MORE ANCILLARY SPENDING SUCH AS THRID-PARTY FIBER INFRASTRUCURE EXPANSION, DO THOSE ADDED COSTS REDUCE THE FUNDS AVAILABLE FOR PIPELINE REPLACEMENT?

A. Yes. Increasing expansion of third-party fiber installations throughout NFG's coverage area has continued to tax its personnel and resources as well as drive up overall locate costs. Since 2023 fiber-related One-Call tickets submitted to NFG have increased from 624 to 2870 per year.[20] This represents a 460% increase, often with large ticket coverage areas and multiple renewals of tickets throughout complex jobs. From 2023 to 2024 damage related to fiber installation increased from 1.6 hits per 1000 tickets, to 8.2 hits per 1000 tickets. From a fiscal standing, due to additional resources and personnel to reduce damages and complete locates on time, cost of locates related to fiber activity have increased from $28.69 per ticket in 2022 to $34.78 per ticket in 2025, an increase of 21%.[21]

[20] Exhibit No. 4, Schedule No. 8, Interrogatory: PS-29.
[21] Exhibit No. 4, Schedule No. 8, Interrogatory: PS-29.

Q. HAS THRID-PARTY FIBER TELECOMM INSTALLATION ACROSS THE COMMONWEALTH IMPACTED NFG'S RESOURCE AVAILABILITY FOR REPLACEMENT AND RESTORATION ACTIVITIES?

A. Yes. Since 2023 third-party fiber related One-Call tickets submitted to NFG have increased from 624 to 2870 per year. It is important to note that NFG has not missed a single fiber-related One-Call locate and continues to strive for this. Through extensive risk reduction efforts with installers, the number of fiber-related damages was reduced to 4.2 hits per 1000 tickets received in 2025 from 8.2 hits per 1000 tickets received in 2024, a 49% decrease. This was accomplished through continued efforts such as personnel on site, monitoring construction activities and recurring complex construction meetings with installers being required.[22]

METHANE DETECTION

Q. WHAT IS A METHANE DETECTOR AND WHAT IS ITS PURPOSE?

A. Methane detectors are devices designed to be placed within structures and are used to measure and initiate an alarm when methane level thresholds are reached within a structure or enclosed area in the proximity of the methane detection device.

[22] Exhibit No. 4, Schedule No. 8, Interrogatory: PS-29.

Q. HOW WOULD NFG AND ITS CUSTOMERS BENEFIT FROM THE INSTALLATION OF THE DIFFERENT TYPES OF METHANE DETECTORS?

A. If provided, NFG would deliver to its customers a safety tool that provides early warning alarms signaling a gas leak and identify potentially hazardous situations. An early warning audible alarm would provide additional time to safely evacuate and notify the emergency response officials. Smart Remote Methane Detector (SRMD) devices would use communication technology to simultaneously notify the customer and the emergency gas response officials, not only allowing additional time for safe egress by those hearing the alarm but also provide advanced notice to reduce response time of the emergency responders who can potentially assist with further evacuations or mitigate the issues triggering the alarm.

Q. DOES NFG HAVE ANY SYSTEMS THAT COULD ESPECIALLY BENEFIT FROM METHANE DETECTORS?

A. Yes, as highlighted above under "Pipeline Replacement Efforts" NFG has a substantial amount of bare steel and wrought iron pipe remaining in its system that are the subject of future replacement projects, including through an accelerated LTIIP plan. The bare steel and wrought iron replacement schedule within the LTIIP targets a 2039 complete replacement and extrapolated data indicates a 17-year timeline. During this period of replacement, the pipe still in the ground is

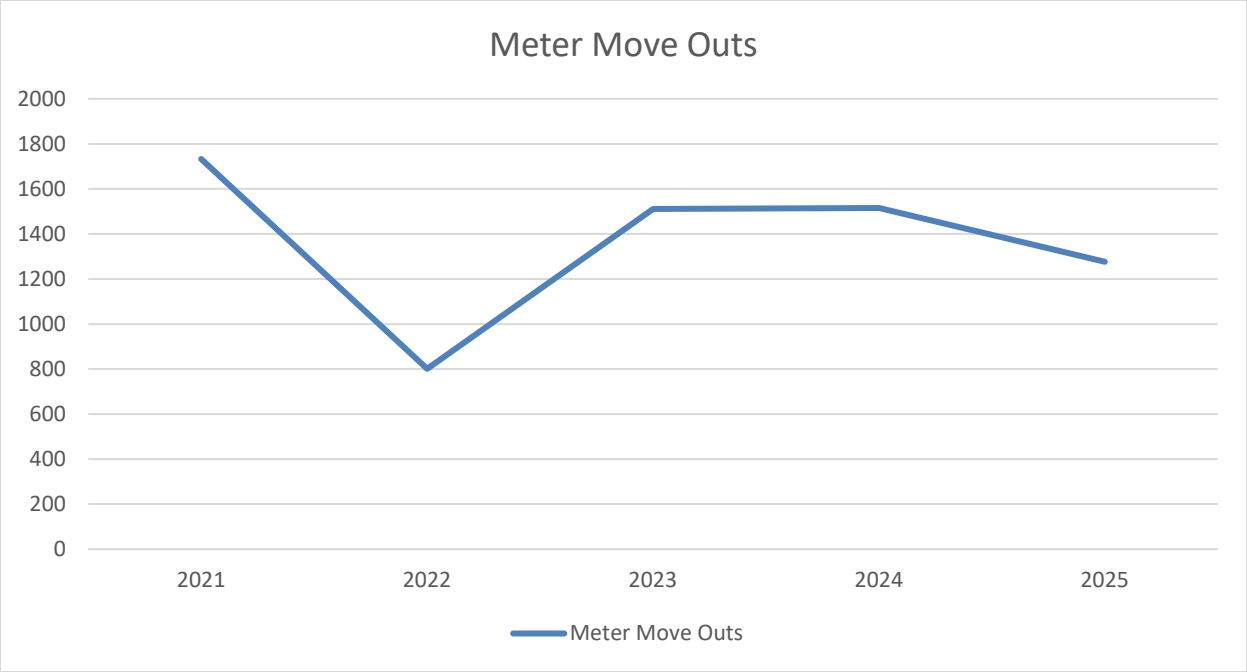
logically prone to a greater number of leaks, and structures in the areas served by these pipes could benefit from methane detectors.

Q. IN YOUR OPINION, WOULD A METHANE DETECTOR PROGRAM REDUCE THE POTENTIAL THREAT OF INSIDE METER SET LEAKS?

A. Yes, I believe a program to address methane detector distribution could assist in mitigating additional risks from inside meters still present in NFG's territory. Historically NFG has replaced inside meter sets during construction replacement projects as well as conducting meter move outs. In response to I&E Interrogatory PS-35, inside meter move outs have trended very similarly or slightly slower over the last 5 years.[23] Extrapolating the data, complete elimination of inside meters through meter move outs would be projected to occur in roughly 22 years. See the chart and table below on inside meter set elimination trends.

Year	Number of Inside Meters	Meter Move Outs
2021	37211	1733
2022	34411	801
2023	32858	1511
2024	31178	1515
2025	29488	1277

[23] Exhibit No. 4, Schedule No. 11, Interrogatory: PS-35.



NFG also stated that inside meter sets are not tracked by pressure, and it may be unknown how many sets are medium pressure with a regulator located inside the structures. Higher pressure gas entering homes for these inside meter sets presents an additional risk.

Q. ARE YOU AWARE OF ANY OTHER JURISDICTIONAL NATURAL GAS DISTRIBUTION COMPANIES THAT HAVE IMPLEMENTED A METHANE DETECTOR PROGRAM?

A. Yes. In January of 2025, the Commission required Philadelphia Gas Works (PGW) to initiate a pilot program for the audible alarm methane detectors in the city of Philadelphia. The details of the $800,000 pilot program are available at Docket Number R-2022-3033834.

In addition, in 2025, the Commission required UGI Utilities to initiate a pilot program for methane detectors in its distribution territory. The details of the pilot program can be viewed in Docket No. R-2024-3052716.

One example outside of Pennsylvania that is noteworthy is the State of New York Public Service Commission, in collaboration with GTI Energy, which has successfully instituted methane detector installations in New York City and other areas across the State as described below.

Q. PLEASE PROVIDE A BRIEF EXPLANATION OF THE METHANE DETECTOR PROGRAM IMPLEMENTED IN NEW YORK.

A. GTI Energy worked with the State of New York Public Service Commission and Con Edison Company of New York, Inc. to establish pilot programs and to develop a rollout for installations of the smart meter compatible detectors.[24] GTI Energy conducted research into both the Audible Residential Methane Detector units and the smart meter technology.

Q. WAS THE METHANE DETECTOR PROGRAM IN NEW YORK SUCCESSFUL AND DID IT PROVIDE POSITIVE IMPACTS FOR THE RESIDENTS OF NEW YORK CITY?

A. Yes, it has already provided a positive impact. Con Edison reported that its smart

[24] See GTI Energy Research and Technology Overview, Page 11 out of 48 https://www.puc.pa.gov/media/2068/gtienergy-research_technology_overview090822.pdf.

devices have alerted personnel and residents of potential hazards on several occasions already.[25] In my opinion, the implementation of these detector programs is a valuable tool for early warning and accelerated actions to reduce the impacts of infrastructure integrity concerns going forward.

Q. HOW COULD NFG AND ITS CUSTOMERS BENEFIT FROM A METHANE DETECTION SYSTEM SIMILAR TO THAT OF NEW YORK?

A. New York City's distribution systems have many of the same issues and concerns as urban areas in NFG's Pennsylvania operating territory. Specifically, the urban environments in New York and Pennsylvania contain vintage infrastructure, similar climates, and the population in select urban environments can be very dense as well. In my opinion, installation of SRMDs, or real-time methane detection devices have the potential to save lives across NFG's Pennsylvania service territory. As technology continues to evolve, the ability to remotely notify the operator of the presence of indoor gas readings is the next logical step for operators across Pennsylvania to drive down the probability of an explosion and the consequences, should an explosion occur.

[25] See GTI Energy Research and Technology Overview, Page 13 of 48 https://www.puc.pa.gov/media/2068/gtienergy-research_technology_overview090822.pdf.

Q. HAVE FEDERAL AGENCIES PROVIDED SUPPORT FOR THE INSTALLATIONS OF INDOOR METHANE DETECTORS?

A. Yes. Both PHMSA and the National Transportation and Safety Board (NTSB) have provided written support for the installation of indoor methane detectors or alarms. Dating back to 2012, PHMSA provided a statement in Advisory Bulletin 2012-05, largely regarding Pennsylvania incidents stemming from cast iron main failures, asking owners and operators of cast iron distribution pipelines and state pipeline safety representatives to consider, among other items, the installation of interior/home methane gas alarms.[26]

The NTSB has repeatedly encouraged the installation of these indoor methane detector devices in final pipeline investigation reports (PIR), This includes but is not limited to the recent NTSB reports on West Reading Chocolate Factory[27] and Atmos Energy Corporation[28] investigations.

Q. CAN SMART METHANE DETECTION TECHNOLOGY BE USED BY OTHER OPERATORS TO IMPROVE SAFETY?

A. Yes. These detectors and technology can be instituted and provide the same early detection and safety enhancements for any operator. These detectors can alert operators of any leak by any cause, including excavation damage, corrosion,

[26] See Federal Register, Vol. 77, No. 57 (March 23, 2012), https://www.govinfo.gov/content/pkg/FR-2012-03-23/pdf/2012-7080.pdf.
[27] See NTSB PIR-25-01 UGI Explosion and Fire.
[28] See NTSB PIR-26-01 Atmos Explosion and Fire.

ruptures, material failures, or any other cause where gas escapes from a pipeline or appurtenance and accumulates in a structure. The detectors will also detect gas from leaks on non-jurisdictional piping within proximity of the meter within the structure. Smart methane detectors can utilize AMI meter technology, or other wireless network technology such as LoRaWAN, to notify company officials or emergency responders of real-time methane readings. Industry research has established an alarm level at 10% LEL to be the acceptable standard for methane detection alarms.

Q. DO YOU HAVE A RECOMMENDATION REGARDING THE IMPLEMENTATION OF METHANE DETECTORS IN NFG'S SYSTEM?

A. Yes. NFG stated that they have not investigated the implementation of a residential methane detector program in Pennsylvania.[29] I recommend that NFG implement a pilot program utilizing SRMDs in a geographic region of NFG's choosing for the installation of 500 to 1000 SRMDs to allow NFG to study the effectiveness of the SRMDs and monitor the related expenses. Further, I recommend NFG consider using AMI technology and LoRaWAN or other communication network technology for the notification methodology utilized by these devices as part of its pilot program. The selection of the devices and technology for this pilot will depend on available technology either compatible

[29] Exhibit No. 4, Schedule No. 10, Interrogatory: PS-34.

with or separate from NFG's current technology. NFG should use a risk-based approach to maximize the benefits in determining the location and rollout of a Methane Detector program. This program can be implemented geographically in sections of NFG's service territory through a risk-based evaluation considering operational history and can include buildings or homes with inside meter sets and regulators, residences, businesses, and places of congregation. NFG has experience with Methane Detector Programs and Pilots in the state of New York.[30]

Finally, this recommendation is not being made in response to any single specific incident or directed at any single natural gas distribution company. Rather, this recommendation is being made in response to industry wide discussions regarding early warning safety enhancements for natural gas distribution systems. Accordingly, I&E's recommendation in this proceeding does not limit I&E's ability to make additional recommendations regarding the deployment of methane detectors in future Commission proceedings.

Q. DO YOU HAVE ANY FURTHER RECOMMENDATIONS REGARDING REPORTING REQUIREMENTS FOR THE METHANE DETECTOR PROGRAM?

A. Yes. I recommend that NFG file quarterly reports with the Commission through this docket number, within 30 days of the end of each calendar quarter, beginning

[30] Exhibit No. 4, Schedule No. 12.

with the calendar quarter that ends December 31, 2026, and ending with the calendar quarter that ends December 31, 2031, or when otherwise directed by the Commission. Each report shall include, separately for Remote Methane Detectors (RMDs) and SRMDs, no less than the following:

- The number of RMDs and SRMDs either funded and/or distributed in the subject calendar quarter;
- The total number of residences, businesses, and places of congregation where methane detectors are distributed under the program to date; and
- A detailed summary of expenses incurred, broken out in sufficient detail to identify:
    - The number of detectors installed;
    - The cost of the detectors and installation, broken down by detector, materials, and labor;
    - Any costs incurred for monitoring;
    - Any leaks detected by the installed monitors;
    - The resolution of that leak detection; and
    - Outreach and education component costs.

To capture the information consistently, NFG shall complete the Methane Detector Reporting Excel spreadsheet, which has been submitted alongside my

testimony,[31] provided to the Commission, each calendar quarter, beginning with the calendar quarter that ends December 31, 2026.

Q. ARE YOUR RECOMMENDATIONS STATED ABOVE COMPLETE AS OF THE WRITING OF YOUR DIRECT TESTIMONY?

A. Yes. Based on the information provided by NFG in discovery responses to date, my recommendations are complete at this time. However, I am still awaiting responses to several outstanding interrogatories. I reserve the right to supplement my discussion and recommendations after I receive those responses, which may be included in either rebuttal testimony or surrebuttal testimony.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes.

[31] Exhibit No. 4, Schedule No. 13.

I&E Exhibit No. 4
Witness: Jesse M. Burkett

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

National Fuel Gas Distribution Corp.

Docket No. R-2025-3059428

Exhibit to Accompany

the

Testimony

Of

Jesse M. Burkett

Bureau of Investigation and Enforcement

Concerning:

Pipeline Replacement
Methane Detector Pilot Program

Exhibit No. 4, Schedule No. 1

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Provide the number of hazardous leaks per mile on mains by operating pressure on each of the following pipe materials for the last five calendar years: A. Wrought Iron B. Bare Steel C. Coated Steel D. Pre-1982 Plastic

Response

Wrought Iron					
	2021	2022	2023	2024	2025
LP	0.023	0.024	0.090	0.056	0.075
MP	0.051	0.000	0.000	0.057	0.000
HP	0.000	0.000	0.000	0.000	0.000

Bare Steel					
	2021	2022	2023	2024	2025
LP	0.116	0.078	0.143	0.143	0.112
MP	0.164	0.171	0.134	0.143	0.147
HP	0.000	0.000	0.000	0.000	0.000

Coated Steel					
	2021	2022	2023	2024	2025
LP	0.000	0.024	0.011	0.000	0.012
MP	0.002	0.004	0.002	0.002	0.000
HP	0.000	0.000	0.000	0.000	0.000

Pre-82 Plastic					
	2021	2022	2023	2024	2025
LP	0.011	0.011	0.000	0.000	0.000

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

MP	0.004	0.004	0.006	0.004	0.004
HP	N/A	N/A	N/A	N/A	N/A

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Provide the number of hazardous leaks on service lines by operating pressure on each of the following pipe materials for the last five calendar years: A. Bare Steel B. Coated Steel C. Pre-1982 Plastic

Response

Bare Steel					
	2021	**2022**	**2023**	**2024**	**2025**
LP	49	53	61	50	52
MP	21	16	18	13	15
HP	0	0	0	0	0

Coated Steel					
	2021	**2022**	**2023**	**2024**	**2025**
LP	1	0	0	3	0
MP	8	5	5	4	5
HP	0	0	0	0	0

Pre-82 Plastic					
	2021	**2022**	**2023**	**2024**	**2025**
LP	2	2	0	2	1
MP	8	13	7	9	8
HP	0	0	0	0	0

Exhibit No. 4, Schedule No. 2

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Provide the company's annual DOT reports from 2021 through 2025.

Response

See attached for 2021 through 2024. The 2025 report is not yet available.

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 5/31/2024

		Initial Date Submitted:	03/14/2022
U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration	**ANNUAL REPORT FOR CALENDAR YEAR 2021 GAS DISTRIBUTION SYSTEM**	**Report Submission Type**	INITIAL
		Date Submitted:	

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0629. Public reporting for this collection of information is estimated to be approximately 16 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

Important: *Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the PHMSA Pipeline Safety Community Web Page at http://www.phmsa.dot.gov/pipeline/library/forms.*

PART A - OPERATOR INFORMATION	**(DOT use only)**		**20221046-46171**

1. Name of Operator	NATIONAL FUEL GAS DISTRIBUTION CORP
2. LOCATION OF OFFICE (WHERE ADDITIONAL INFORMATION MAY BE OBTAINED)	
2a. Street Address	6363 Main St
2b. City and County	Williamsville Erie
2c. State	NY
2d. Zip Code	14221
3. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER	13061
4. HEADQUARTERS NAME & ADDRESS	
4a. Street Address	6363 MAIN ST.
4b. City and County	WILLIAMSVILLE
4c. State	NY
4d. Zip Code	14221
5. STATE IN WHICH SYSTEM OPERATES	PA
6. **THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP** *(Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.)*	
Natural Gas	
7. **THIS REPORT PERTAINS TO THE FOLLOWING TYPE OF OPERATOR** *(Select Type of Operator based on the structure of the company included in this OPID for which this report is being submitted.)***:**	
Investor Owned	

PART B - SYSTEM DESCRIPTION

1.GENERAL

	STEEL				PLASTIC	CAST/ WROUGHT IRON	DUCTILE IRON	COPPER	OTHER	RECONDITIONED CAST IRON	SYSTEM TOTAL
	UNPROTECTED		CATHODICALLY PROTECTED								
	BARE	COATED	BARE	COATED							
MILES OF MAIN	711.082	3.743	84.099	846.296	3076.849	127.784	0	0	0.555	0	4850.408
NO. OF SERVICES	16871	0	0	6364	170401	0	0	0	0	0	193636

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 5/31/2024

2.MILES OF MAINS IN SYSTEM AT END OF YEAR

MATERIAL	UNKNOWN	2" OR LESS	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8" THRU 12"	OVER 12"	SYSTEM TOTALS
STEEL	0	371.519	755.484	463.450	43.451	11.316	1645.22
DUCTILE IRON	0	0	0	0	0	0	0
COPPER	0	0	0	0	0	0	0
CAST/WROUGHT IRON	0	24.649	61.894	40.146	1.095	0	127.784
PLASTIC PVC	0	0	0	0	0	0	0
PLASTIC PE	0	1735.024	1198.483	137.400	5.942	0	3076.849
PLASTIC ABS	0	0	0	0	0	0	0
PLASTIC OTHER	0	0	0	0	0	0	0
OTHER	0	0	0	0.555	0	0	0.555
RECONDITIONED CAST IRON	0	0	0	0	0	0	0
TOTAL	0	2131.192	2015.861	641.551	50.488	11.316	4850.408

Describe Other Material: Epoxy Fiberglass

3.NUMBER OF SERVICES IN SYSTEM AT END OF YEAR — **AVERAGE SERVICE LENGTH: 70.56**

MATERIAL	UNKNOWN	1" OR LESS	OVER 1" THRU 2"	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8"	SYSTEM TOTALS
STEEL	0	9909	13040	268	16	2	23235
DUCTILE IRON	0	0	0	0	0	0	0
COPPER	0	0	0	0	0	0	0
CAST/WROUGHT IRON	0	0	0	0	0	0	0
PLASTIC PVC	0	0	0	0	0	0	0
PLASTIC PE	9	165246	4710	421	15	0	170401
PLASTIC ABS	0	0	0	0	0	0	0
PLASTIC OTHER	0	0	0	0	0	0	0
OTHER	0	0	0	0	0	0	0
RECONDITIONED CAST IRON	0	0	0	0	0	0	0
TOTAL	9	175155	17750	689	31	2	193636

Describe Other Material:

4.MILES OF MAIN AND NUMBER OF SERVICES BY DECADE OF INSTALLATION

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 5/31/2024

	UNKNOWN	PRE-1940	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999	2000-2009	2010-2019	2020-2029	TOTAL
MILES OF MAIN	99.718	341.364	85.754	360.925	603.211	694.569	820.161	801.372	495.149	470.807	77.377	4850.407
NUMBER OF SERVICES	13	6036	1808	4873	7789	26853	34755	40717	34440	30013	6339	193636

PART C - TOTAL LEAKS AND HAZARDOUS LEAKS ELIMINATED/REPAIRED DURING THE YEAR

CAUSE OF LEAK	MAINS		SERVICES	
	TOTAL	HAZARDOUS	TOTAL	HAZARDOUS
CORROSION FAILURE	542	94	148	75
NATURAL FORCE DAMAGE	0	0	4	3
EXCAVATION DAMAGE	39	38	97	95
OTHER OUTSIDE FORCE DAMAGE	3	1	30	28
PIPE, WELD OR JOINT FAILURE	13	3	19	4
EQUIPMENT FAILURE	14	6	111	28
INCORRECT OPERATIONS	10	5	18	8
OTHER CAUSE	6	0	12	4

NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR : 23
NUMBER OF HAZARDOUS LEAKS INVOLVING A MECHANICAL JOINT FAILURE : 44

PART D - EXCAVATION DAMAGE

1. TOTAL NUMBER OF EXCAVATION DAMAGES BY APPARENT ROOT CAUSE: 145

a. One-Call Notification Practices Not Sufficient: 36

b. Locating Practices Not Sufficient: 28

c. Excavation Practices Not Sufficient: 71

d. Other: 10

2. NUMBER OF EXCAVATION TICKETS : 52820

PART E - EXCESS FLOW VALUE (EFV) AND SERVICE VALVE DATA

Total Number Of Services with EFV Installed During Year: 2802

Estimated Number Of Services with EFV In the System At End Of Year: 55869

* Total Number of Manual Service Line Shut-off Valves Installed During Year: 13

* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year: 63

**These questions were added to the report in 2017.*

PART F - LEAKS ON FEDERAL LAND

TOTAL NUMBER OF LEAKS ON FEDERAL LAND REPAIRED OR SCHEDULED TO REPAIR: 0

PART G-PERCENT OF UNACCOUNTED FOR GAS

UNACCOUNTED FOR GAS AS A PERCENT OF TOTAL CONSUMPTION FOR THE 12 MONTHS ENDING JUNE 30 OF THE REPORTING YEAR.

[(PURCHASED GAS + PRODUCED GAS) MINUS (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS)] DIVIDED BY (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS) TIMES 100 EQUALS PERCENT UNACCOUNTED FOR.

FOR YEAR ENDING 6/30: -0.47%

PART H - ADDITIONAL INFORMATION

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 5/31/2024

PART I - PREPARER	
Angela Mattern,Associate Engineer (Preparer's Name and Title)	(814) 871-8035 (Area Code and Telephone Number)
matterna@natfuel.com (Preparer's email address)	(Area Code and Facsimile Number)

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 5/31/2024

		Initial Date Submitted:	03/15/2023
U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration	**ANNUAL REPORT FOR CALENDAR YEAR 2022 GAS DISTRIBUTION SYSTEM**	**Report Submission Type**	INITIAL
		Date Submitted:	

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0629. Public reporting for this collection of information is estimated to be approximately 16 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

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PART A - OPERATOR INFORMATION	**(DOT use only)**		20231157-51859

1. Name of Operator	NATIONAL FUEL GAS DISTRIBUTION CORP
2. LOCATION OF OFFICE (WHERE ADDITIONAL INFORMATION MAY BE OBTAINED)	
2a. Street Address	6363 Main St
2b. City and County	Williamsville Erie
2c. State	NY
2d. Zip Code	14221
3. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER	13061
4. HEADQUARTERS NAME & ADDRESS	
4a. Street Address	6363 MAIN ST.
4b. City and County	WILLIAMSVILLE
4c. State	NY
4d. Zip Code	14221
5. STATE IN WHICH SYSTEM OPERATES	PA
6. **THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP** *(Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.)*	
Natural Gas	
7. **THIS REPORT PERTAINS TO THE FOLLOWING TYPE OF OPERATOR** *(Select Type of Operator based on the structure of the company included in this OPID for which this report is being submitted.)***:**	
Investor Owned	

PART B - SYSTEM DESCRIPTION

1.GENERAL

	STEEL				PLASTIC	CAST/ WROUGHT IRON	DUCTILE IRON	COPPER	OTHER	RECONDITIONED CAST IRON	SYSTEM TOTAL
	UNPROTECTED		CATHODICALLY PROTECTED								
	BARE	COATED	BARE	COATED							
MILES OF MAIN	671.461	2.919	80.135	849.178	3116.994	123.833	0	0	0.555	0	4845.075
NO. OF SERVICES	16058	0	0	6188	171345	0	0	0	0	0	193591

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 5/31/2024

2. MILES OF MAINS IN SYSTEM AT END OF YEAR

MATERIAL	UNKNOWN	2" OR LESS	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8" THRU 12"	OVER 12"	SYSTEM TOTALS
STEEL	0	361.297	730.792	457.7	43.441	10.464	1603.694
DUCTILE IRON	0	0	0	0	0	0	0
COPPER	0	0	0	0	0	0	0
CAST/WROUGHT IRON	0	23.133	60.191	39.414	1.095	0	123.833
PLASTIC PVC	0	0	0	0	0	0	0
PLASTIC PE	0	1770.735	1200.414	139.062	6.783	0	3116.994
PLASTIC ABS	0	0	0	0	0	0	0
PLASTIC OTHER	0	0	0	0	0	0	0
OTHER	0	0	0	0.555	0	0	0.555
RECONDITIONED CAST IRON	0	0	0	0	0	0	0
TOTAL	0	2155.165	1991.397	636.731	51.319	10.464	4845.076

Describe Other Material: Epoxy Fiberglass

3.NUMBER OF SERVICES IN SYSTEM AT END OF YEAR | **AVERAGE SERVICE LENGTH: 70.81**

MATERIAL	UNKNOWN	1" OR LESS	OVER 1" THRU 2"	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8"	SYSTEM TOTALS
STEEL	0	9466	12501	262	15	2	22246
DUCTILE IRON	0	0	0	0	0	0	0
COOPER	0	0	0	0	0	0	0
CAST/WROUGHT IRON	0	0	0	0	0	0	0
PLASTIC PVC	0	0	0	0	0	0	0
PLASTIC PE	1	166194	4712	423	15	0	171345
PLASTIC ABS	0	0	0	0	0	0	0
PLASTIC OTHER	0	0	0	0	0	0	0
OTHER	0	0	0	0	0	0	0
RECONDITIONED CAST IRON	0	0	0	0	0	0	0
TOTAL	1	175660	17213	685	30	2	193591

Describe Other Material:

4.MILES OF MAIN AND NUMBER OF SERVICES BY DECADE OF INSTALLATION

	UNKNOWN	PRE-1940	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999	2000-2009	2010-2019	2020-2029	TOTAL
MILES OF MAIN	96.262	328.865	83.262	342.674	594.507	688.483	818.212	797.275	494.365	470.137	131.033	4845.075
NUMBER OF SERVICES	12	5679	1729	4645	7563	26260	34079	40156	34057	29676	9735	193591

PART C - TOTAL LEAKS AND HAZARDOUS LEAKS ELIMINATED/REPAIRED DURING THE YEAR

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 5/31/2024

CAUSE OF LEAK	MAINS		SERVICES	
	TOTAL	HAZARDOUS	TOTAL	HAZARDOUS
CORROSION FAILURE	433	82	132	69
NATURAL FORCE DAMAGE	0	0	5	2
EXCAVATION DAMAGE	39	33	110	105
OTHER OUTSIDE FORCE DAMAGE	6	2	23	22
PIPE, WELD OR JOINT FAILURE	9	1	17	7
EQUIPMENT FAILURE	22	5	87	24
INCORRECT OPERATIONS	4	1	15	7
OTHER CAUSE	6	2	10	7

NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR : 40
NUMBER OF HAZARDOUS LEAKS INVOLVING A MECHANICAL JOINT FAILURE : 36

PART D - EXCAVATION DAMAGE

1. TOTAL NUMBER OF EXCAVATION DAMAGES BY APPARENT ROOT CAUSE: 152

a. One-Call Notification Practices Not Sufficient: 45

b. Locating Practices Not Sufficient: 35

c. Excavation Practices Not Sufficient: 65

d. Other: 7

2. NUBMER OF EXCAVATION TICKETS 54022

PART E – EXCESS FLOW VALUE (EFV) AND SERVICE VALUE DATA

Total Number Of Services with EFV Installed During Year : 2908

Estimated Number Of Services with EFV In the System At End Of Year: 58792

* Total Number of Manual Service Line Shut-off Valves Installed During Year: 25

* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year: 94

**These questions were added to the report in 2017.*

PART F - LEAKS ON FEDERAL LAND

TOTAL NUMBER OF LEAKS ON FEDERAL LAND REPAIRED OR SCHEDULED TO REPAIR: 0

PART G – PERCENT OF UNACCOUNTED FOR GAS

UNACCOUNTED FOR GAS AS A PERCENT OF TOTAL CONSUMPTION FOR THE 12 MONTHS ENDING JUNE 30 OF THE REPORTING YEAR.

[(PURCHASED GAS + PRODUCED GAS) MINUS (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS)] DIVIDED BY (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS) TIMES 100 EQUALS PERCENT UNACCOUNTED FOR.

FOR YEAR ENDING 6/30: -0.38%

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 5/31/2024

PART H - ADDITIONAL INFORMATION	
PART I - PREPARER	
Angela Mattern Engineer I (Preparer's Name and Title)	(814) 871-8035 (Area Code and Telephone Number)
matterna@natfuel.com (Preparer's email address)	(000) 000-0000 (Area Code and Facsimile Number)

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 6/30/2026

		Initial Date Submitted:	03/14/2024
U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration	**ANNUAL REPORT FOR CALENDAR YEAR 2023 GAS DISTRIBUTION SYSTEM**	**Report Submission Type**	SUPPLEMENTAL
		Date Submitted:	03/13/2025

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0629. Public reporting for this collection of information is estimated to be approximately 20 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

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PART A - OPERATOR INFORMATION	**(DOT use only)**		20241098-72300

1. Name of Operator	NATIONAL FUEL GAS DISTRIBUTION CORP
2. LOCATION OF OFFICE (WHERE ADDITIONAL INFORMATION MAY BE OBTAINED)	
2a. Street Address	6363 Main St
2b. City and County	Williamsville Erie
2c. State	NY
2d. Zip Code	14221
3. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER	13061
4. HEADQUARTERS NAME & ADDRESS	
4a. Street Address	6363 MAIN ST.
4b. City and County	WILLIAMSVILLE
4c. State	NY
4d. Zip Code	14221
5. STATE IN WHICH SYSTEM OPERATES	PA
6. **THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP** *(Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.)*	
Natural Gas	
7. **THIS REPORT PERTAINS TO THE FOLLOWING TYPE OF OPERATOR** *(Select Type of Operator based on the structure of the company included in this OPID for which this report is being submitted.)*:	
Investor Owned	

PART B - SYSTEM DESCRIPTION

1.GENERAL

	STEEL				PLASTIC	CAST/ WROUGHT IRON	DUCTILE IRON	COPPER	OTHER	RECONDITIONED CAST IRON	SYSTEM TOTAL
	UNPROTECTED		CATHODICALLY PROTECTED								
	BARE	COATED	BARE	COATED							
MILES OF MAIN	631.451	2.921	77.305	847.16	3173.383	117.169	0	0	0.555	0	4849.944
NO. OF SERVICES	15096	0	0	5982	172585	0	0	0	0	0	193663

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 6/30/2026

2. MILES OF MAINS IN SYSTEM AT END OF YEAR

MATERIAL	UNKNOWN	2" OR LESS	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8" THRU 12"	OVER 12"	SYSTEM TOTALS
STEEL	0	351.053	704.75	449.323	43.247	10.464	1558.837
DUCTILE IRON	0	0	0	0	0	0	0
COPPER	0	0	0	0	0	0	0
CAST/WROUGHT IRON	0	20.687	57.244	38.179	1.059	0	117.169
PLASTIC PVC	0	0	0	0	0	0	0
PLASTIC PE	0	1819.73	1204.6	142.351	6.702	0	3173.383
PLASTIC ABS	0	0	0	0	0	0	0
PLASTIC OTHER	0	0	0	0	0	0	0
OTHER	0	0	0	0.555	0	0	0.555
RECONDITIONED CAST IRON	0	0	0	0	0	0	0
TOTAL	0	2191.47	1966.594	630.408	51.008	10.464	4849.944

Describe Other Material: Epoxy Fiberglass

3.NUMBER OF SERVICES IN SYSTEM AT END OF YEAR — **AVERAGE SERVICE LENGTH: 70.94**

MATERIAL	UNKNOWN	1" OR LESS	OVER 1" THRU 2"	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8"	SYSTEM TOTALS
STEEL	0	9059	11756	246	15	2	21078
DUCTILE IRON	0	0	0	0	0	0	0
COPPER	0	0	0	0	0	0	0
CAST/WROUGHT IRON	0	0	0	0	0	0	0
PLASTIC PVC	0	0	0	0	0	0	0
PLASTIC PE	1	167441	4705	422	16	0	172585
PLASTIC ABS	0	0	0	0	0	0	0
PLASTIC OTHER	0	0	0	0	0	0	0
OTHER	0	0	0	0	0	0	0
RECONDITIONED CAST IRON	0	0	0	0	0	0	0
TOTAL	1	176500	16461	668	31	2	193663

Describe Other Material:

4.MILES OF MAIN AND NUMBER OF SERVICES BY DECADE OF INSTALLATION

	UNKNOWN	PRE-1940	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999	2000-2009	2010-2019	2020-2029	TOTAL
MILES OF MAIN	91.906	312.227	78.671	323.62	584.323	684.066	813.358	793.783	493.279	469.604	205.108	4849.945
NUMBER OF SERVICES	12	5264	1584	4406	7277	25686	33402	39625	33716	29368	13323	193663

PART C - TOTAL LEAKS AND HAZARDOUS LEAKS ELIMINATED/REPAIRED DURING THE YEAR

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 6/30/2026

CAUSE OF LEAK	MAINS		SERVICES	
	TOTAL	HAZARDOUS	TOTAL	HAZARDOUS
CORROSION FAILURE	634	95	163	82
NATURAL FORCE DAMAGE	4	1	3	1
EXCAVATION DAMAGE	33	30	104	103
OTHER OUTSIDE FORCE DAMAGE	4	3	23	22
PIPE, WELD OR JOINT FAILURE	17	3	33	10
EQUIPMENT FAILURE	12	2	112	29
INCORRECT OPERATIONS	9	1	20	7
OTHER CAUSE	7	1	10	2

NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR : 15
NUMBER OF HAZARDOUS LEAKS INVOLVING A MECHANICAL JOINT FAILURE : 40

PART D - EXCAVATION DAMAGE

1. TOTAL NUMBER OF EXCAVATION DAMAGES BY APPARENT ROOT CAUSE: 142

a. One-Call Notification Practices Not Sufficient: 37

b. Locating Practices Not Sufficient: 26

c. Excavation Practices Not Sufficient: 75

d. Other: 4

2. NUMBER OF EXCAVATION TICKETS 54721

PART E – RESERVED

PART F - LEAKS ON FEDERAL LAND

TOTAL NUMBER OF LEAKS ON FEDERAL LAND REPAIRED OR SCHEDULED TO REPAIR: 0

PART G – PERCENT OF UNACCOUNTED FOR GAS

UNACCOUNTED FOR GAS AS A PERCENT OF TOTAL CONSUMPTION FOR THE 12 MONTHS ENDING JUNE 30 OF THE REPORTING YEAR.

[(PURCHASED GAS + PRODUCED GAS) MINUS (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS)] DIVIDED BY (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS) TIMES 100 EQUALS PERCENT UNACCOUNTED FOR.

FOR YEAR ENDING 6/30: -0.55%

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 6/30/2026

PART H - ADDITIONAL INFORMATION	
Updated Parts B1, B2, and B4 - Miles of Main.	
PART I - PREPARER	
Angela Mattern Engineer II (Preparer's Name and Title)	(814) 871-8035 (Area Code and Telephone Number)
matterna@natfuel.com (Preparer's email address)	(000) 000-0000 (Area Code and Facsimile Number)

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 6/30/2026

		Initial Date Submitted:	03/13/2025
U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration	**ANNUAL REPORT FOR CALENDAR YEAR 2024 GAS DISTRIBUTION SYSTEM**	**Report Submission Type**	INITIAL
		Date Submitted:	

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0629. Public reporting for this collection of information is estimated to be approximately 20 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

Important: *Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the PHMSA Pipeline Safety Community Web Page at http://www.phmsa.dot.gov/pipeline/library/forms.*

PART A - OPERATOR INFORMATION	**(DOT use only)**		20251042-72283

1. Name of Operator	NATIONAL FUEL GAS DISTRIBUTION CORP
2. LOCATION OF OFFICE (WHERE ADDITIONAL INFORMATION MAY BE OBTAINED)	
2a. Street Address	6363 Main St
2b. City and County	Williamsville Erie
2c. State	NY
2d. Zip Code	14221
3. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER	13061
4. HEADQUARTERS NAME & ADDRESS	
4a. Street Address	6363 MAIN ST.
4b. City and County	WILLIAMSVILLE
4c. State	NY
4d. Zip Code	14221
5. STATE IN WHICH SYSTEM OPERATES	PA
6. **THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP** *(Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.)*	
Natural Gas	
7. **THIS REPORT PERTAINS TO THE FOLLOWING TYPE OF OPERATOR** *(Select Type of Operator based on the structure of the company included in this OPID for which this report is being submitted.)***:**	
Investor Owned	

PART B - SYSTEM DESCRIPTION

1.GENERAL

	STEEL				PLASTIC	CAST/ WROUGHT IRON	DUCTILE IRON	COPPER	OTHER	RECONDITIONED CAST IRON	SYSTEM TOTAL
	UNPROTECTED		CATHODICALLY PROTECTED								
	BARE	COATED	BARE	COATED							
MILES OF MAIN	594.424	2.861	72.789	845.377	3228.544	107.774	0	0	0.546	0	4852.315
NO. OF SERVICES	14115	0	0	5763	173607	0	0	0	0	0	193485

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 6/30/2026

2. MILES OF MAINS IN SYSTEM AT END OF YEAR

MATERIAL	UNKNOWN	2" OR LESS	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8" THRU 12"	OVER 12"	SYSTEM TOTALS
STEEL	0	343.516	677.542	441.377	42.665	10.351	1515.451
DUCTILE IRON	0	0	0	0	0	0	0
COPPER	0	0	0	0	0	0	0
CAST/WROUGHT IRON	0	19.059	52.562	35.094	1.059	0	107.774
PLASTIC PVC	0	0	0	0	0	0	0
PLASTIC PE	0	1864.186	1211.842	145.689	6.827	0	3228.544
PLASTIC ABS	0	0	0	0	0	0	0
PLASTIC OTHER	0	0	0	0	0	0	0
OTHER	0	0	0	0.546	0	0	0.546
RECONDITIONED CAST IRON	0	0	0	0	0	0	0
TOTAL	0	2226.761	1941.946	622.706	50.551	10.351	4852.315

Describe Other Material: Epoxy Fiberglass

3.NUMBER OF SERVICES IN SYSTEM AT END OF YEAR — **AVERAGE SERVICE LENGTH: 71.14**

MATERIAL	UNKNOWN	1'' OR LESS	OVER 1'' THRU 2''	OVER 2'' THRU 4''	OVER 4'' THRU 8''	OVER 8''	SYSTEM TOTALS
STEEL	0	8627	11013	222	14	2	19878
DUCTILE IRON	0	0	0	0	0	0	0
COPPER	0	0	0	0	0	0	0
CAST/WROUGHT IRON	0	0	0	0	0	0	0
PLASTIC PVC	0	0	0	0	0	0	0
PLASTIC PE	0	168462	4705	424	16	0	173607
PLASTIC ABS	0	0	0	0	0	0	0
PLASTIC OTHER	0	0	0	0	0	0	0
OTHER	0	0	0	0	0	0	0
RECONDITIONED CAST IRON	0	0	0	0	0	0	0
TOTAL	0	177089	15718	646	30	2	193485

Describe Other Material:

4.MILES OF MAIN AND NUMBER OF SERVICES BY DECADE OF INSTALLATION

	UNKNOWN	PRE-1940	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999	2000-2009	2010-2019	2020-2029	TOTAL
MILES OF MAIN	90.143	295.699	70.836	304.8	572.815	679.699	808.164	791.448	492.439	468.663	277.61	4852.316
NUMBER OF SERVICES	0	4905	1462	4119	6945	25066	32703	39117	33380	29032	16756	193485

PART C - TOTAL LEAKS AND HAZARDOUS LEAKS ELIMINATED/REPAIRED DURING THE YEAR

CAUSE OF LEAK	MAINS		SERVICES	
	TOTAL	HAZARDOUS	TOTAL	HAZARDOUS
CORROSION FAILURE	456	88	108	65
NATURAL FORCE DAMAGE	3	1	7	5
EXCAVATION DAMAGE	35	31	94	89
OTHER OUTSIDE FORCE DAMAGE	3	3	17	17
PIPE, WELD OR JOINT FAILURE	15	1	23	9

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OMB NO: 2137-0629
EXPIRATION DATE: 6/30/2026

EQUIPMENT FAILURE	14	2	101	37
INCORRECT OPERATIONS	3	1	17	7
OTHER CAUSE	9	1	10	6

NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR : 16
NUMBER OF HAZARDOUS LEAKS INVOLVING A MECHANICAL JOINT FAILURE : 44

PART D – EXCAVATION DAMAGE

Notification Issue Sub-Total	43	**Location Issue Sub-Total**	19
No notification made to the One-Call Center/811	28	Facility not marked due to Abandoned facility	0
Excavator dug outside area described on ticket	6	Facility not marked due to Incorrect facility records/maps	4
Excavator dug prior to valid start date/time	2	Facility not marked due to Locator error	4
Excavator dug after valid ticket expired	7	Facility not marked due to No response from operator/contract locator	0
Excavator provided incorrect notification information	0	Facility not marked due to Incomplete marks at damage location	0
		Facility not marked due to Tracer wire issue	0
Excavation Issue Sub-Total	*66*	Facility not marked due to Unlocatable Facility	0
Excavator dug prior to verifying marks by test-hole (pothole)	25	Facility marked inaccurately due to Abandoned facility	0
Excavator failed to maintain clearance after verifying marks	33	Facility marked inaccurately due to Incorrect facility records/maps	7
Excavator failed to protect/shore/support facilities	2	Facility marked inaccurately due to Locator error	4
Improper backfilling practices	0	Facility marked inaccurately due to Tracer wire issue	0
Marks faded or not maintained	6		
Improper excavation practice not listed above	0		
Miscellaneous Root Causes Sub-Total	*9*		
Deteriorated facility	1		
One Call Center Error	0		
Previous damage	8	1. Total Excavation Damages	137
Root Cause not listed	0	2. Number of Excavation Tickets	55613

NOTICE: This report is required by 49 CFR Part 191. Failure to report may result in a civil penalty OMB No. 2137-0629 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 6/30/2026

PART E – RESERVED

PART F - LEAKS ON FEDERAL LAND	**PART G – PERCENT OF UNACCOUNTED FOR GAS**
TOTAL NUMBER OF LEAKS ON FEDERAL LAND REPAIRED OR SCHEDULED TO REPAIR: 0	UNACCOUNTED FOR GAS AS A PERCENT OF TOTAL CONSUMPTION FOR THE 12 MONTHS ENDING JUNE 30 OF THE REPORTING YEAR. [(PURCHASED GAS + PRODUCED GAS) MINUS (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS)] DIVIDED BY (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS) TIMES 100 EQUALS PERCENT UNACCOUNTED FOR. FOR YEAR ENDING 6/30: -0.40%

PART H - ADDITIONAL INFORMATION

PART I - PREPARER

Angela Mattern Engineer II (Preparer's Name and Title)	(814) 871-8035 (Area Code and Telephone Number)
matterna@natfuel.com (Preparer's email address)	(000) 000-0000 (Area Code and Facsimile Number)

Exhibit No. 4, Schedule No. 3

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Provide the number of miles of bare steel main retired each year for the last five calendar years, broken out by Servicenter.

Response

The table below depicts the number of miles of bare steel main retired or replaced each year for the last five calendar years broken out by Service center. Negative values represent data reconciliation resulting from map corrections in GIS.

Miles of Bare Steel Pipeline Retired or Replaced by Servicenter					
RC	**2021**	**2022**	**2023**	**2024**	**2025**
311	2.80	2.06	12.10	6.17	10.62
312	1.13	8.24	7.35	2.87	5.87
314	2.10	0.98	2.97	2.18	2.27
317	2.28	0.28	2.98	0.85	1.83
323	-0.06	-1.27	3.13	0.73	1.36
326	0.62	0.12	3.36	0.95	1.89
327	0.80	-2.03	3.20	0.09	2.16
329	-0.49	-1.12	7.71	1.39	1.42
332	0.92	-1.98	4.58	3.09	4.55
344	0.16	2.37	10.48	9.60	4.03
347	2.06	0.78	5.12	6.08	5.42
350	1.82	-0.48	15.49	7.55	10.02
Grand Total	**14.12**	**7.96**	**78.47**	**41.54**	**51.45**

Exhibit No. 4, Schedule No. 4

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Provide the number of miles of wrought iron main retired each year for the last five calendar years, broken out by Servicenter.

Response

The table below depicts the number of miles of wrought iron main retired or replaced each year for the last five calendar years broken out by Servicenter.

Miles of Wrought Iron Pipeline Retired or Replaced by Servicenter					
RC	**2021**	**2022**	**2023**	**2024**	**2025**
311	0.13	0.00	0.04	0.29	0.55
312	0.18	0.00	0.03	0.00	0.00
314	0.41	0.02	0.59	0.15	0.06
317	0.23	0.00	0.13	0.20	0.00
323	0.06	0.66	1.21	0.49	0.50
326	0.74	0.35	0.78	0.67	0.33
327	0.20	0.00	0.20	0.69	0.07
329	0.05	0.03	0.61	0.45	0.34
332	0.13	0.06	0.11	0.41	0.39
344	0.32	0.54	0.09	1.04	0.34
347	0.82	1.10	2.50	3.45	1.63
350	0.57	1.20	0.36	1.55	1.67
Grand Total	**3.84**	**3.95**	**6.66**	**9.39**	**5.86**

Exhibit No. 4, Schedule No. 5

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

What are the forecasted main replacement goals for years 2026 through 2030 and how do they compare with National Fuel's prior goals?

Response

The tables below summarize the Company's leak prone pipe (LPP) replacement goals for the previous 5 years as well as the upcoming 5 years.

Leak Prone Pipe Main Replacement Goals (2021-2025)

LPP Reduction	CY 2021 Miles	CY 2022 Miles	CY 2023 Miles	CY 2024 Miles	CY 2025 Miles
Distribution < 124 psig	40	40	44	45	46
Transmission & High Pressure > 124 psig	0	0	4	7	5
Total	40	40	48	52	51

Leak Prone Pipe Replacement Goals (2026-2030)

LPP Reduction	CY 2026 Miles	CY 2027 Miles	CY 2028 Miles	CY 2029 Miles	CY 2030 Miles
Distribution < 124 psig	50	50	50	50	50
Transmission & High Pressure > 124 psig	4	7	7	7	7
Total	54	57	57	57	57

Exhibit No. 4, Schedule No. 6

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Reference Statement No. 9 – Direct Testimony of Mark Schaefer, page 4, Table 2 and Table 3. Provide a summary of annual capital expenditures related to modernization showing the budgeted total cost of pipeline replacement on a per mile basis including but not limited to the following costs: design/inspection, materials, construction/labor, pavement restoration and permits in each Servicenter over the last five calendar years.

Response

Please note that the Company does not budget based on costs broken down by Servicenter or by specific categories such as design/inspection, materials, construction/labor, pavement restoration and permits. In addition, the Company budgets on a fiscal year basis which spans from October 1st to September 30th.

Listed below is the budgeted cost per mile of pipeline replacement of distribution pipe for fiscal years 2021-2025. Please note this does not include HP Steel or Transmission pipeline replacement, which is budgeted on a per project basis.

Fiscal Year	Budgeted cost per mile
2021	$455,000
2022	$463,000
2023	$430,000
2024	$455,000
2025	$580,000

Exhibit No. 4, Schedule No. 7

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Reference Statement No. 9 – Direct Testimony of Mark Schaefer, page 4, Table 2 and Table 3. Provide a summary of annual capital expenditures related to modernization showing the actual total cost of pipeline replacement on a per mile basis including but not limited to the following costs: design/inspection, materials, construction/labor, pavement restoration and permits in each Servicenter over the last five calendar years.

Response

Please note that the company accounting system does not track costs broken down by the specific categories of design/inspection, materials, construction/labor, pavement restoration, and permits. Rather the company tracks costs by project type for both company and contractor crews. In addition, the company budgets on a fiscal year basis which spans from October 1st to September 30th.

In the attached confidential excel document, “I&E PS-26.xlsx”, is the actual cost per mile of pipeline replacement by Servicenter of distribution pipe for fiscal years 2021-2025. Please note this does not include HP Steel or Transmission pipeline replacement, which is budgeted on a per project basis.

Exhibit No. 4, Schedule No. 8

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Reference Statement No. 17 – Direct Testimony of Jason Scouten, page 18, Figure 2. Provide a summary for 2023-2025, related to fiber and communications work: A. One call volume received. B. Breakdown of % on time locates from these tickets. C. Number of hits annually related to fiber and communication work. D. A cost summary of the additional burden incurred from these

Response

Note: The Reference Document should be Statement No.16 - Direct Testimony of Jason Scouten

A. Total Fiber-Involved Tickets by Year
   - 2023: 624
   - 2024: 2,094
   - 2025: 2,870

   Note: This represents: 235% increase from 2023 → 2024, 37% increase from 2024 → 2025

B. Despite the increase in broadband fiber ticket volumes, NFG has responded to every broadband-related One Call notification either as “marked” or as an “ongoing project” response, accompanied by direct communication and coordination with project representatives. In all cases, field markings were completed prior to the start of excavation, ensuring that accurate facility information was available even when excavators and project owners failed to meet their own design and coordination obligations under the category of “complex projects” under the Pennsylvania One Call Law due to their size, duration, and phased nature of the excavation activities required.

C. DAMAGES by Fiber Contractors
   - 2023- 1 (1.6 Hits per 1000)
   - 2024- 17 (8.2 Hits per 1000)
   - 2025- 12 (4.2 Hits per 1000)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

D. Table below reflects NFG's fiscal-year cost per locate and demonstrates the overall increase in locating-related expenses. While NFG's internal reporting structure does not allow for isolating costs attributable solely to broadband fiber activity, the upward trend is consistent with the operational burdens created by these projects.

In addition to standard locating costs, NFG has incurred significant expenses beyond what is typical for routine line-locating operations. These additional costs arise from increased management and supervisory oversight, direct inspection of excavation activities, expanded leak surveying prompted by unreported damages, repeated remarking of tickets due to construction delays and inadequate project design. Collectively, these impacts reflect the disproportionate strain broadband fiber construction has placed on NFG's damage-prevention and operational resources.

The increased consumption of operational resources has also had a direct impact on NFG's planned pipeline replacement and operational goals. Resources that would otherwise support long-term system improvement and risk-reduction initiatives have been diverted to address the recurring issues associated with broadband fiber construction. This diversion of personnel, time, and funding represents a material strain on NFG's operational capacity and undermines the efficiency of its operation.

Overall Cost per Locate per Fiscal Year		
FY 2022	28.69	**% increase**
FY 2023	33.08	15.3%
FY 2024	34.90	5.5%
FY 2025	34.78	-0.3%

Exhibit No. 4, Schedule No. 9

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Provide details of efforts the company has taken to lower the restoration costs associated with facility replacement for each year since 2021.

Response

National Fuel Gas Distribution Corporation ("NFGDC" or the "Company") has taken a number of steps since 2021 to address and reduce municipal restoration and inspection costs associated with facility replacement projects. In several instances, the Company identified municipal fee structures that it believed were inconsistent with applicable law or otherwise unreasonable and engaged with the applicable municipality to resolve those issues through negotiation, settlement, or regulatory processes.

In certain cases, these efforts resulted in formal resolutions, including settlement agreements filed with the Pennsylvania Public Utility Commission. These actions not only addressed the specific municipal fee structures at issue but also helped clarify expectations regarding appropriate restoration and inspection charges applicable to the Company's work within municipal rights-of-way.

When the Company first began addressing these issues, there had been relatively little precedent among utilities challenging such practices. As a result, several of the earlier matters helped establish precedent, and clarify the Company's position with municipalities. Over time, this has reduced the need for similar actions in later years as municipal practices have adjusted accordingly.

See I&E PS 31 Exhibit 1 which summarizes the principal instances since 2021 where the Company addressed municipal restoration or inspection fee structures associated with facility replacement projects and the means by which those matters were resolved.

#	Municipality	Date of Resolution	NFGDC's Concern with Municipal Fee Structure	Means of Resolution	Historic Costs Directly Avoided through Resolution/ Explanation
1	**City of Erie, Erie County**	2/14/2022	Unlawful degradation fees; excessive "inspection fee."	Settlement Agreement, which was filed with PaPUC at Docket No. U-2022-3030421 before becoming effective.	$113,568 – this amount represents the calculated amount of degradation and inspection fees which were withheld from the City of Erie for projects requiring permits accruing from November 2019 through August 2021, when NFGDC filed a lawsuit challenging the City of Erie's unlawful fee structure. The basis for NFGDC's withholding of such fees was the illegality of same.

#	Municipality	Date of Resolution	NFGDC's Concern with Municipal Fee Structure	Means of Resolution	Historic Costs Directly Avoided through Resolution/ Explanation
					For additional information, please see filings at U-2022-3030421.
2	**City of DuBois, Clearfield County**	7/7/2022	Unlawful degradation fee.	Engagement of City of DuBois Resulting in Informal Resolution	$17,154.79 – this amount represents the calculated amount of degradation fees withheld by NFGDC per invoices received from July 2021 through April 2022.
3	**Clarendon Borough, Warren County**	4/20/2021	Excessive permitting fee.	Engagement with Clarendon Borough Resulting in Revised Ordinance.	No historic costs were avoided. Prospective costs were avoided insofar as Clarendon Borough revised the subject

#	Municipality	Date of Resolution	NFGDC's Concern with Municipal Fee Structure	Means of Resolution	Historic Costs Directly Avoided through Resolution/ Explanation
					Ordinance by dropping the per excavation permit fee to reasonable amount.
4	**Mead Township, Warren County**	7/19/2022	Provisions of ordinance are tantamount to a "tax" insofar as conditions in same are to essentially "improve" the road after work.	Engagement with Mead Township Resulting in Informal Resolution	No historic costs were avoided. Prospective costs were avoided insofar as the Municipality has not charged NFGDC with any unreasonable charges.
5	**Sheffield Township, Warren County**	4/19/2021	Excessive permitting fee.	Engagement with Sheffield Township Resulting in Revised Ordinance	$800 in historic fees were refunded to NFGDC. Prospective costs were avoided insofar as Sheffield's revised

#	Municipality	Date of Resolution	NFGDC's Concern with Municipal Fee Structure	Means of Resolution	Historic Costs Directly Avoided through Resolution/ Explanation
					ordinance dropped the amount of the excavation permit fee.
6	**Sugarcreek Borough, Warren County**	6/15/2021	Excessive permitting fee.	Engagement with Sugarcreek Borough Resulting in Informal Resolution	No historic costs were avoided. Prospective costs were avoided insofar as Sugarcreek Borough advised National Fuel it would not enforce the portion of the subject Ordinance against NFGDC.
7	**Greenville Borough, Mercer County**	7/14/2025	Excessive permitting fee.	Engagement with Greenville Borough's Solicitor, Resulting in Ordinance with "flat fee" for combined permitting/inspection fee of $150.	No historic costs were avoided. Prospective costs were avoided insofar as the

#	Municipality	Date of Resolution	NFGDC's Concern with Municipal Fee Structure	Means of Resolution	Historic Costs Directly Avoided through Resolution/ Explanation
					Municipality has not charged NFGDC with any unreasonable charges.

Exhibit No. 4, Schedule No. 10

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

If NFG has investigated residential methane detector installation, provide an estimate cost per customer and a timeframe to install methane detector technology.

Response

The Company has not investigated residential methane detector installation for its Pennsylvania service territory.

Exhibit No. 4, Schedule No. 11

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Provide the number of existing inside meter sets, broken out by system pressure, for the last 5 calendar years. How many meter move outs have occurred each year?

Response

National Fuel does not track inside meter sets by pressure, however the existing inside meter sets and number of meter move outs completed over the last 5 years are summarized in the table below.

Year	Number of Inside Meter Sets	Meter Move Outs
2021	37,211	1,733
2022	34,411	801
2023	32,858	1,511
2024	31,178	1,515
2025	29,488	1,277

Exhibit No. 4, Schedule No. 12

March 31, 2026

VIA ELECTRONIC FILING

Honorable Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

RE: Case 23-G-0627 – Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of National Fuel Gas Distribution Corporation for Gas Service Residential Methane Detector Program 2026 Annual Report

Dear Secretary Phillips:

On December 19, 2024, the New York State Public Service Commission ("Commission") issued its *Order Adopting Terms of Joint Proposal and Establishing Gas Rate Plan With Minor Modifications* in Case 23-G-0627 ("Order"). The Order authorized National Fuel Gas Distribution Corporation ("National Fuel" or "Company") to enhance its residential methane detector ("RMD") program ("RMD Program") by distributing more than 102,000 RMDs to low-income customers, customers whose accounts are classified as elderly, blind or disabled, and customers with inside gas meters. The Joint Proposal requires National Fuel to file, by March 31 of each calendar year in the Rate Plan, an annual report detailing (1) the number of RMDs installed during the calendar year and to date, (2) the associated costs of the RMDs installed for the calendar year and to date, (3) the Company's review of the effectiveness of the RMD Program during the calendar year, (4) and any modifications made to the RMD Program.

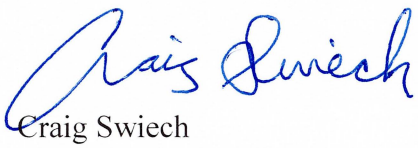
During calendar year 2025, the Company distributed 17,560 units at a total cost of $1,097,557. Since 2025 was the first year of the program, these figures also represent the program totals to date. The RMD Program was effectively administered in its first year of operation as National Fuel distributed approximately 500 more units than estimated in its rate case filing. The Company distributes RMDs through its workforce as well as through a third-party vendor. The unit costs of both distribution methods have been higher than expected, due primarily to the cost of the RMDs themselves. These unit costs are likely to continue to increase during the program's lifecycle. Additional details on budgeted and actual amounts for 2025 are presented in Attachment 1.

As for program modifications, on December 9, 2025, the Company filed a Petition for RMD Program Funding ("Petition") in Case 23-G-0627. As explained in the Petition, the intent of the Joint Proposal was to provide RMD Program funding of $5,956,080 over the three-year rate plan, allowing the Company to distribute 102,000 RMDs. It was later discovered that the

actual funding included in revenue requirement totaled only $2,931,821, leading to a shortfall of $3,024,259. The Company has proposed to use an available regulatory liability as a funding source. As of this filing, the Petition is pending before the Commission.

Please contact the undersigned if you have any questions related to this filing.

Respectfully submitted,



Craig Swiech
Vice President
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Attachment 1

RMD Rate Case Perfomance *

RMD Unit Distribution			
Calendar Year	Proposed	Actuals	Difference
2025 - NFG	4,265	4,822	557
2025 - Contractor	12,794	12,738	(56)
Totals	17,059	17,560	501

RMD Budget Performance*					
Calendar Year		Budgeted		Actual	Difference
2025 - NFG	$	203,812	$	255,563	$ 51,750
2025 - Contractor	$	744,753	$	841,995	$ 97,241
Total	$	948,566	$	1,097,557	$ 148,991

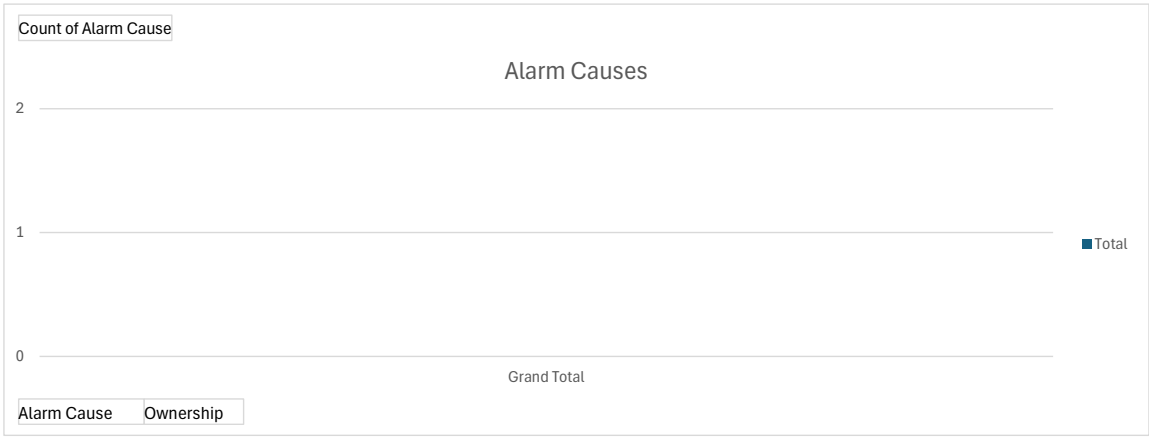
RMD Unit Costs					
Calendar Year		Proposed		Actuals**	Difference
2025 - NFG	$	47.79	$	51.11	$ 3.32
2025 - Contractor	$	58.21	$	66.10	$ 7.89

*Program and Reporting are on a calendar year basis.

** Actual unit cost for NFG is based on a 5,000 unit order.

Exhibit No. 4, Schedule No. 13

Row Labels	Count of Alarm Cause
Grand Total	



Row Labels	Count of Alarm Cause
Grand Total	

Category	RMD	SRMD	Total
Units Funded (Current Quarter)			0
Units Distributed (Current Quarter)			0
Units Installed (Current Quarter)			0
Total (Current Quarter)	0	0	0

Expense Item	Unit Cost	Labor	Materials	Total Cost
Detector Hardware		N/A	N/A	0
Installation Services	N/A			0
System Monitoring Fees		N/A	N/A	0
Outreach & Education	N/A			0
Administrative/Other				0
Total Cost		0	0	0

I&E Statement No. 4-SR
Witness: Jesse Burkett

PENNSYLVANIA PUBLIC UTILITY COMMISSION

v.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION

Docket No. R-2026-3059428

Surrebuttal Testimony

of

Jesse M. Burkett

Bureau of Investigation and Enforcement

Concerning:

Pipeline Replacement Efforts and Restoration Costs
Methane Detector Pilot Program

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INTRODUCTION

Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.

A. My name is Jesse M. Burkett. I am a Civil Engineer (General) in the Pipeline Safety Division of the Pennsylvania Public Utility Commission's (Commission) Bureau of Investigation and Enforcement (I&E). My business address is Pennsylvania Public Utility Commission, 400 North Street, Harrisburg, PA 17120.

Q. ARE YOU THE SAME JESSE BURKETT WHO IS RESPONSIBLE FOR THE DIRECT TESTIMONY CONTAINED IN I&E STATEMENT NO. 4 AND THE SCHEDULES IN I&E EXHIBIT NO. 4?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. The purpose of my surrebuttal testimony is to address statements made by National Fuel Gas Corp.'s (NFG) witnesses Mark Shaeffer (NFG Statement No. 9-R) and Jason Scouten (NFG Statement No. 16-R) in their rebuttal testimonies, regarding the Company's pipeline replacement adequacy and adoption of a pilot program for a methane detection system in select regions of NFG's Pennsylvania service territory.

PIPELINE REPLACEMENT EFFORTS AND RESTORATION COSTS

Q. DO YOU AGREE WITH MR. SCHAEFERS STATEMENTS IN REGARD TO LONG-TERM INFRASTRUCTURE REPLACEMENT PLAN (LTIIP) TARGET REPLACEMENTS?

A. No, although the numbers used in his statement are correct for targets, they cannot be guaranteed and historic mileage replacements do not support the idea that targets will be met. NFG's LTIIP states that the Company will replace all bare steel and wrought iron pipes in its system by 2039. In Mark Schaefers rebuttal testimony, he stated that "I&E used the average replacement schedule from 2021 through 2025 of 44.64 miles per year to project that it will take 17 years to replace all remaining bare steel and wrought iron pipe." and created a chart to project LTIIP target replacements into the future instead of averages. The schedule of replacement targets includes 2 miles per year of vintage plastic pipe replacement. With those vintage plastic miles subtracted from the replacement mileage each year, bare steel and wrought iron will not in fact reach complete replacement by 2039.[1] My direct testimony used average replacement statistics for projection rather than LTIIP targets, since the LTIIP filings are only targets and not guaranteed. Looking at the historical replacement mileages, the 2021-2023

[1] NFG Statement No. 9-R, p.2-3.

replacement mileage varied widely between years[2] and at times did not meet LTIIP filings for those years (target of 40 miles in CY2022).[3]

Q. HAS THE COMPANY COMMENTED ON THE RECOMMENDATION TO TRACK INDIVIDUAL COSTS DURING RESTORATION TO BETTER REDUCE OVERALL COST?

A. Yes. Mr. Schafer stated "as part of the project planning phase, Engineering and Operations management, along with consideration of factors such as job location, schedule, complexity, etc., reviews each replacement project to determine the most economical contractor or company resource best fit to successfully complete the project. Blanket contracts are competitively bid and awarded to contractors by geographical region on a 3-year basis. The contracts include hundreds of bid items for mainline and service installation and removal including construction methods (i.e. trench, insertion, drill, etc.), size, length, material and restoration."[4] In addition, Mr. Scouten stated "National Fuel categorizes and tracks replacement costs, such as materials, labor, restoration, and permitting where applicable on an overall and project specific basis."[5] If these items are already received and reviewed, it is still I&E's position that tracking and comparing items individually over time could assist in reducing cost of pipeline replacement projects.

---

2 I&E Statement No. 4, p. 10.
3 Petition of National Fuel Gas Distribution Corporation for Approval of a Major Modification to its Existing Long-Term Infrastructure Improvement Plan, Docket No. P-2022-3034957 (NFG Filing Pet for LTIIP 1/1/23-12/31/27 p.17).
4 NFG Statement No. 9-R, p.5.
5 NFG Statement No. 16-R, p.7.

METHANE DETECTION

Q. DOES MR. SCOUTEN AGREE WITH YOUR METHANE DETECTOR PROGRAM RECOMMENDATIONS MADE IN DIRECT TESTIMONY?

A. Not really. Mr. Scouten took the position that NFG is not looking to begin a methane detector pilot program on Pennsylvania assets and cited both the New York program and the proposed Pennsylvania House Bill 1522 as reasons.[6] NFG does not dispute that methane detection technologies may provide an additional layer of risk mitigation.

Q. WHAT IS YOUR RESPONSE TO MR. SCOUTEN'S OPINION ON METHANE DETECTORS?

A. House Bill 1522 has only passed in the House and has not been voted on by the Senate. At this point in time, we cannot predict if this Senate Bill will reach fruition. If the Bill is passed, we cannot predict what may change in the Bill between now and implementation. Additionally, this Bill does not reference a smart methane detector program. I&E maintains that a pilot program of methane detectors, whether smart or simply audible, would benefit overall public safety, especially in those rural areas where response times may be slower. I maintain my recommendation from direct testimony that NFG should commit to implementing a pilot program in Pennsylvania and, based upon research and an analysis of real-world experiences from its peers as well as its own pilot program(s), determine the

[6] NFG Statement No. 16-R, p.8.

most efficient, reliable and cost-effective approach for the installation of methane detectors for NFG's Pennsylvania distribution customers. The pilot program in Pennsylvania is proposed to gather additional information as to the feasibility of large-scale implementation throughout the system. Pennsylvania distribution systems may vary in composition, risk, structure, geographic location and hazards in comparison to the current pilot program implemented in New York.

Q. HOW WOULD YOU ADDRESS MR. SCOUTENS CONCERN OVER SMART REMOTE METHANE DETECTOR (SRMD) IMPLEMENTATION COSTS?

A. SRMD's are only one possible type of methane detector to implement into the system. Other options such as an audible remote methane detector (ARMD) could be considered as an alternative or complementary tool to reduce overall costs.

Q. HAS YOUR RECOMMENDATION FOR PILOT PROGRAM IMPLEMENTATION AND REPORTING CHANGED?

A. No, I continue to recommend that NFG implement a program in accordance with the recommendations made in my direct testimony as well as use the reporting recommendations, including the use of the file(s) provided for reporting results to the commission.[7]

[7] I&E Statement No. 4, start p. 22.

Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

A. Yes.

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	Docket No.: R-2025-3059428
v.	:	
	:	
National Fuel Gas Distribution Company	:	
	:	

DIRECT TESTIMONY

OF

Michael Deupree

On behalf of the

PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

OCA Statement No. 1

Date Served: April 16, 2026

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I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS?

A. My name is Michael W. Deupree. My business address is 5800 One Perkins Place Drive, Suite 5-F, Baton Rouge, Louisiana, 70808.

Q. PLEASE STATE YOUR OCCUPATION AND CURRENT PLACE OF EMPLOYMENT?

A. I am a Senior Research Consultant with the Acadian Consulting Group ("ACG"), a research and consulting firm that specializes in the analysis of regulatory, economic, financial, accounting, statistical, and public policy issues associated with regulated and energy industries. ACG is a Louisiana-registered partnership, formed in 1995, and is located in Baton Rouge, Louisiana.

Q. PLEASE DESCRIBE YOUR PROFESSIONAL QUALIFICATIONS.

A. I hold a Bachelor of Arts degree in Business Economics from Buena Vista University in Storm Lake, Iowa, and a Master of Arts degree in Economics from the University of Kansas in Lawrence, Kansas. I began my professional career with the Staff of the Kansas Corporation Commission in 2008 while in graduate school conducting analyses of topics related to energy and economy as a Research Assistant, eventually being promoted to a Research Analyst and later Senior Research Economist after graduation. I left the Kansas Corporation Commission to take a position with ACG in late 2011, where I have been promoted to positions of increasing responsibility since, including my current position which I started in mid-2021. Appendix A provides my professional resume, which includes a listing of my publications, presentations, pre-filed expert witness testimony, expert reports, and expert legislative testimony.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. I have been retained by the Pennsylvania Office of Consumer Advocate ("OCA") to address matters related to the general rate case filed by National Fuel Gas Distribution Corporation ("NFG" or the "Company"). I specifically have been asked to provide an overview of this case from a public policy perspective, and review issues related to alternative regulation and the Company's proposed Allocated Class Cost of Service Study ("ACOSS") and associated rate design.

Q. ARE YOU SPONSORING ANY EXHIBITS?

A. Yes. I am sponsoring the following Exhibits MWD-1 through MWD-9.

- Exhibit MWD-1: Commission Alternative Regulation Consideration (§ 69.3302)
- Exhibit MWD-2: Survey of Approved Pennsylvania Natural Gas WNA Mechanisms
- Exhibit MWD-3: Summary of Results of Company's Proposed ACOSS
- Exhibit MWD-4: Correlation of Customers and Distribution Mains Additions
- Exhibit MWD-5: Summary of Results of ACOSS Using Seaboard Allocation
- Exhibit MWD-6: Summary of Results of Alternative ACOSS
- Exhibit MWD-7: Summary of Company's Proposed Revenue Allocation
- Exhibit MWD-8: Summary of Results of Alternative Revenue Allocation
- Exhibit MWD-9: Analysis of Customer-Related Costs

Q. PLEASE INTRODUCE OCA EXPERT WITNESSES AND SUMMARIZE THE TOPICS OF THEIR RESPECTIVE TESTIMONIES IN THIS PROCEEDING.

A. In addition to my testimony (OCA Statement 1), OCA is sponsoring the testimony of four additional expert witnesses in this proceeding. Mr. Lafayette Morgan (OCA Statement 2) addresses accounting issues, Ms. Maureen Reno (OCA Statement 3) addresses rate of return ("ROR") issues, Mr. Brian Andrews (OCA Statement 4) addresses depreciation expense issues, and Ms. LeeAnn Wise (OCA Statement 5) will address issues concerning customer service.

II. SUMMARY OF RECOMMENDATIONS

Q. WHAT IS YOUR RECOMMENDATION BASED ON CURRENT MACROECONOMIC CONDITIONS?

A. I recommend the Commission take into consideration current macroeconomic conditions, including consumer affordability concerns, when determining just and reasonable rates for the Company. Average Pennsylvanians are struggling with lingering inflation concerns besides looking at potential additional concerns placed on them due to fallout from the conflict in the Persian Gulf. This while the Company has seen increasing stock prices for its shareholders and no obvious market distress. The Commission, in particular, should require some level of shared burden, balancing consumer affordability concerns with the financial interests of the Company. I have been advised by counsel that the OCA will argue in their legal briefs that the Commission should not grant NFG any increase in this proceeding due to the substantial affordability concerns that consumers are facing.

Q. WHAT IS YOUR OVERALL RECOMMENDATION REGARDING REGULATORY LAG?

A. The Company has not demonstrated that the existing regulatory framework in Pennsylvania is failing to support timely and adequate cost recovery. Rather, the evidence suggests that regulatory lag is already being effectively managed. The Commission should reaffirm the value of regulatory lag as a structural feature of traditional ratemaking and recognize that further erosion of this principle is neither necessary nor justified in this case.

Q. WHAT IS YOUR POSITION ON THE CONTINUATION OF THE COMPANY'S WEATHER NORMALIZATION ADJUSTMENT?

A. I recommend that the Commission affirmatively discontinue NFG's current weather normalization adjustment ("WNA") mechanism. The mechanism has failed to produce balanced outcomes for ratepayers, functioning as an asymmetric surcharge on customers' bills for the two full years the mechanism has been in operation, even though the mechanism was designed as a pilot to symmetrically provide both surcharges and credits to customers. The WNA is also not required to address regulatory lag concerns of the Company given the Company's use of a fully projected future test year ("FPFTY") and distribution system investment charge ("DSIC").

Q. DO YOU HAVE ANY ALTERNATIVE PROPOSAL IF THE COMMISSION DECIDES TO CONTINUE THE WNA?

A. If the Commission decides to continue the WNA, I recommend that it be continued as a three-year pilot program rather than being adopted as a permanent mechanism. This will allow the Commission the opportunity to routinely reevaluate the WNA to ensure that the mechanism is not producing negative outcomes for ratepayers. I further recommend that the Commission increase the deadband from three percent to five percent and eliminate the months of October and

May from the WNA period. This would strengthen ratepayer protections and would furthermore make the Company's WNA pilot consistent with the recent WNA pilot the Commission approved for Columbia Gas of Pennsylvania (Columbia Gas).

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE PROPOSED ENERGY EFFICIENCY PROGRAM RIDER?

A. I recommend that the Commission reject the proposed Energy Efficiency ("EE") Program rider. The proposed rider fails to satisfy any of the three commonly held evaluation criteria for a sound cost tracker mechanism. Specifically, EE Program expenses are not substantial, not outside the control of the utility, and are neither unpredictable nor volatile. Therefore, the costs associated with the Company's proposed EE Program do not have the characteristics that are conducive for recovery through a cost tracker outside of base rates.

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE CLASSIFICATION OF DISTRIBUTION MAINS INVESTMENT AND THE USE OF ZERO INTERCEPT STUDY IN ITS ALLOCATED COST OF SERVICE STUDY?

A. I recommend that the Commission reject the Company's proposed zero-intercept study ("ZIS") approach. ZIS and related minimum system study ("MSS") that are used to classify distribution mains investments are fundamentally flawed and provide little to no value in setting just and reasonable rates. In the alternative, I recommend that the Commission approve an alternative classification of distribution mains that incorporates a peak and average ("P&A") cost allocation method using weights based on the Company's test year system load factor. These recommendations better reflect cost causation principles and provide a more reasonable basis for allocating costs among customer classes.

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE COMPANY'S PROPOSED REVENUE APPORTIONMENT?

A. I recommend the Commission adopt a more reasonable revenue apportionment method based on my alternative allocated cost of service study ("ACOSS") results that also limits the rate increase compared to the Company's proposed revenue allocation method. First, I recommend that classes with current relative cost parity ratios below 0.95 receive a rate increase equal to 1.15 times the system average increase. Second, I recommend that classes with current relative cost parity ratios greater than 1.05 receive a rate increase equal to 0.85 times the system average increase. Finally, I recommend that the remaining rate increase be equally allocated to remaining rate classes with current relative cost parity ratios of between 0.95 and 1.05.

Q. WHAT ARE YOUR CUSTOMER CHARGE RECOMMENDATIONS AND CONCLUSIONS?

A. I recommend that the Commission reject the Company's proposed increase in residential and commercial customer charges. An analysis of customer-related costs finds that residential rate classes are currently recovering a majority of customer-related costs through monthly customer charges. The proposal would also negatively impact the public policy goals of energy efficiency and would burden low-use customers with a greater than average portion of any proposed increase in the case. The Commission should keep the Company's current customer charges for all customers.

Q. DO YOU HAVE AN ALTERNATIVE RECOMMENDATION IF THE COMMISSION DECIDES AN INCREASE IN MONTHLY CUSTOMER CHARGES IS WARRANTED?

A. Yes. I recommend that the Commission limit its increase in the Company's monthly customer charges to the percentage rate increase class revenue requirement. In the context of my proposed revenue apportionment this would be a 14.34 percent increase for residential customers at the Company's proposed overall requested rate increase. This would correspond to a roughly $2.00 increase in the monthly residential customer charge, or an increase from the current $14.00 per month to $16.00 per month. I further recommend that any increase in customer charges be subject to scalebacks to reflect changes in allocated class revenue increases pursuant to Commission Orders.

III. CURRENT MACROECONOMIC TRENDS AND CONDITIONS

Q. WHAT IS YOUR UNDERSTANDING OF THE PURPOSE OF THIS PROCEEDING?

A. The purpose of this case is to determine the "just and reasonable" rates for the Company under Chapter 13, and other provisions, of the Public Utility Code.

Q. WHAT ARE PUBLIC UTILITIES IN THE CONTEXT OF REGULATION?

A. Public utilities are considered in economics to be natural monopolies, specifically that the high capital cost associated with the establishment and operations of public utilities render having multiple competing services – as would be found in other industries – is economically inefficient and therefore not in the public interest. Regulation, therefore, is designed as a substitute for the disciplining forces that would be found in competitive markets that prevent an industry from using its unfettered monopolistic powers to set prices and conditions of service. However, regulators

cannot tip the scale so far in the favor of consumers that regulation becomes confiscatory to the public utility by preventing the utility from the opportunity to earn a reasonable rate of return on their investment that deprives the utility of sources of capital.

Q. AS A NON-LAWYER, HOW IS THE PHRASE "JUST AND REASONABLE" GENERALLY VIEWED IN THE CONTEXT OF REGULATION?

A. Regulators typically evaluate "just and reasonable" in the context of what is called a "zone of reasonableness." This inherently assumes that there is no one correct answer to the question of "just and reasonable," but instead requires regulators to balance the interest of several sectors of the public, including not only utility investors, but also the interests of the utility's customers (that itself is comprised of different classes of customers with different individual interests) and the public policy interests of local governments impacted by the utility's operations. Importantly, this framework of regulation implies that regulators must be cognizant of the larger macroeconomic conditions impacting the utility customers, and how this impacts customers' ability to afford utility service.

Q. HOW DOES THE CURRENT PROCEEDING COMPARE WITH THE COMPANY'S PREVIOUS RATE CASE?

A. On January 28, 2026, Company requested a base rate increase of $19.7 million in the current proceeding.[1] This represents the second such requested increase since 2022, when the Company was authorized an approximate $23 million increase in rates. In the context of this prior rate increase, ratepayers will see a total rate increase of more than 36.4 percent in three years, or an increase of more than 12.1 percent per year on average.

[1] Company filing, Application, page 1.

Q. IS THERE ANY EVIDENCE THAT NFG CUSTOMERS ARE FACING AFFORDABILITY PRESSURES?

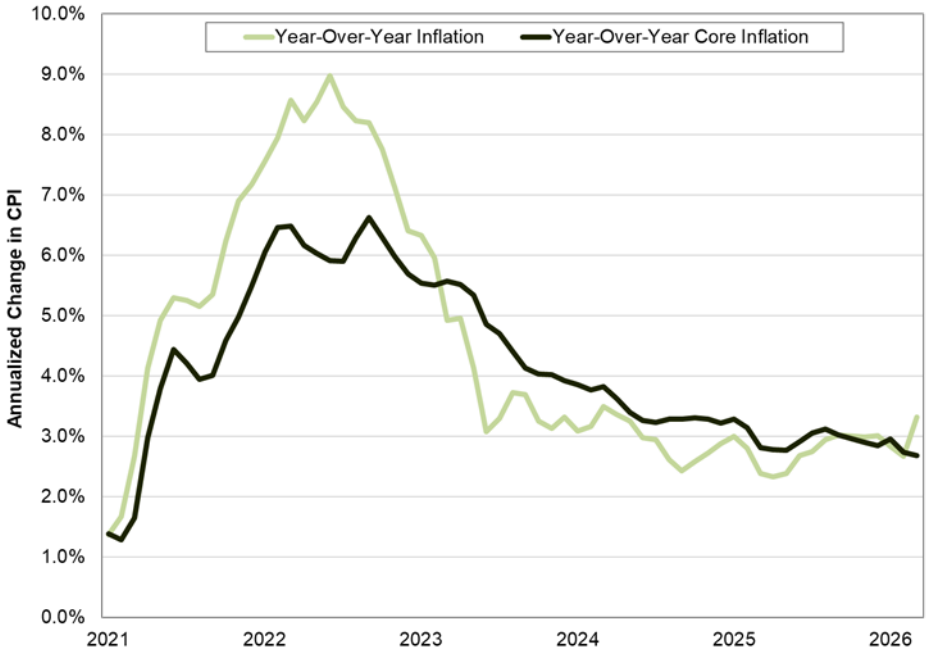
A. Yes. Both customer terminations and reconnections rose in 2025. Specifically, customer terminations increased by 16 percent, and reconnections increased by 20 percent. This indicates that customers are struggling to maintain natural gas service in the context of the Company's 2023 authorized rate increase and other macroeconomic pressures these customers are facing. These rate increases are contributing to broader affordability concerns being placed on consumers.

Q. WHAT DO YOU MEAN BY AFFORDABILITY CONCERNS?

A. By affordability concerns, I mean the increasing burden on residential customers when utility costs are added to already elevated household expenses. Utility rate increases do not occur in a vacuum. Consumers experience utility rate increases alongside the ongoing price increases of food, housing, transportation, and other necessities. These concerns are especially acute for low-income households who devote a larger portion of their income to these necessities. NFG appears to recognize this concern and adopted a Customer Assistance Program ("CAP") to reduce utility bills for participating low-income customers with high energy burdens, which itself replaced an earlier Low Income Residential Assistance ("LIRA") program.[2] It is for this reason that it is important to consider whether broader consumer prices remain elevated when establishing rate increases.

[2] Direct Testimony of Matthew W. Stoops, Company St. 17 at 2:15-21.

Figure 1: Monthly Growth in CPI

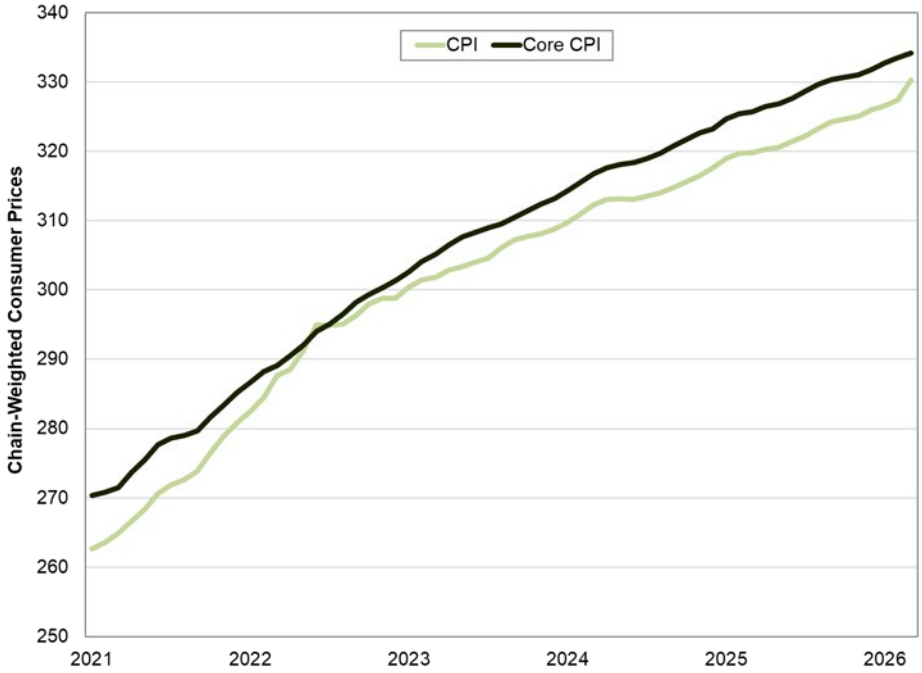


Source: Bureau of Labor Statistics

Q. IS THERE ANY EVIDENCE OF RISING PRICES IN CONSUMER PRODUCTS?

A. Yes. One commonly used measure of changes in the prices of goods and services is the Consumer Price Index ("CPI"), which is published by the U.S. Bureau of Labor Statistics ("BLS"). CPI measures changes over time in the prices consumers pay for a representative basket of goods and services, including food, energy, transportation, shelter, and other commodities. While the annualized growth in CPI has fallen from the highs that were seen in the immediate aftermath of the 2020 pandemic, it should be recognized that CPI is still elevated, reaching 3.3 percent in March 2026. This is well above the Federal Reserve's annual inflation target of 2.0 percent.

Figure 2: Consumer Price Index



Source: Bureau of Labor Statistics

Q. DOES THE MODERATING OF CPI GROWTH RATE FROM ITS HIGHS IMMEDIATELY FOLLOWING THE 2020 PANDEMIC MEAN THAT CONSUMER PRICES HAVE FALLEN?

A. No. It is important to recognize that CPI is reported monthly in terms of an annualized increase in consumer prices, meaning that a decline in the monthly 'headline' CPI does not mean that consumer prices have decreased, but rather that the rate of growth in consumer prices has slowed. Figure 2 shows that overall, consumer prices have been continually increasing since at least 2021, even while the rate of growth has somewhat stabilized. Over the period January 2021 to January 2026, overall consumer prices increased 24.3 percent, while "core" consumer prices – which remove volatile energy and food prices – increased nearly 23.1 percent.

Q. HAS THE FEDERAL RESERVE MADE ANY STATEMENTS REGARDING RECENT INFLATION?

A. Yes. Chairman Powell addressed this in a recent press conference on March 18, 2026. The Federal Reserve's preferred measure of inflation is the Personal Consumption Expenditures Price Index ("PCE"), a related, but generally broader, measure of consumer inflation similar to CPI that is produced by the U.S. Bureau of Economic Analysis ("BEA"). Specifically, CPI is limited to out-of-pocket spending on goods and services by urban households while PCE extends this "basket of goods" to include rural households and third-party expenses on the consumer's behalf, such as employer-provided health insurance, Medicare and Medicaid.[3] Chairman Powell stated that estimates indicate that over the twelve months ending in February 2026, PCE and Core PCE prices rose by 2.8 percent and 3.0 percent, respectively.[4]

Q. HAS THE FEDERAL RESERVE RELEASED ANY INFLATION PROJECTIONS FOR 2026?

A. Yes. In the same press conference referenced above, Chairman Powell stated that the median PCE projection for 2026 is 2.7 percent.[5] Total PCE inflation of 2.7 percent would be 70 basis points above the Federal Reserve's 2.0 percent longer-run inflation goal. This is important because the Federal Reserve's own outlook has inflation above target levels in 2026. This means that consumers are expected to continue dealing with increasing pressures on their cost of living.

---

[3] Inflation – Measuring the cost of living: The CPI versus the PCE price index," Cleveland Federal Reserve, Center for Inflation Research; note that changes in annual PCE inflation on average have been 0.39 percent than changes in annual CPI inflation.

[4] Board of Governors of the Federal Reserve System, Transcript of Chair Powell's Press Conference, Mar. 18, 2026, at 2.

[5] *Id.*

Q. ARE THERE ANY OTHER REPUTABLE INFLATION PROJECTIONS?

A. Yes. The Federal Reserve Bank of Philadelphia releases the Survey of Professional Forecasters, which includes inflation projections. In the First Quarter 2026 Survey, released on March 6, 2026, the forecasters project that CPI and core CPI will both rise 2.6 percent. [6] This is measured on a fourth-quarter-over-fourth-quarter basis. This suggests that professional forecasters also expect inflation to remain elevated enough to affect affordability.

Q. WHAT IS THE EFFECT OF THIS CONTINUOUSLY INFLATIONARY PROCESS?

A. This continuous inflationary process means that when prices rise at abnormally high levels, there must be compensatory periods of lower levels for inflation to return to its long-term average. For example, if the average annual inflation rate is two percent, then a year with three percent inflation would need to be followed by a year with approximately one percent inflation to return to the average trend. Even though present inflation is below the levels seen in 2022 and 2023, it is still above two percent, so there must be periods below this target to return to the long-term average. Until the economy experiences these off-setting low inflationary periods, consumers must bear the cumulative effects of the price level rising more quickly than its average trend.

Q. HAVE ENERGY-RELATED PRICES ALSO CONTRIBUTED TO AFFORDABILITY PRESSURE?

A. Yes. Pennsylvania consumers are currently experiencing financial pressure from all aspects of the energy market. Wholesale electricity prices in the PJM western hub, for example, increased 48.8 percent on average from 2024 to 2025. Likewise, Pennsylvania citygate natural gas prices increased 2.8 percent

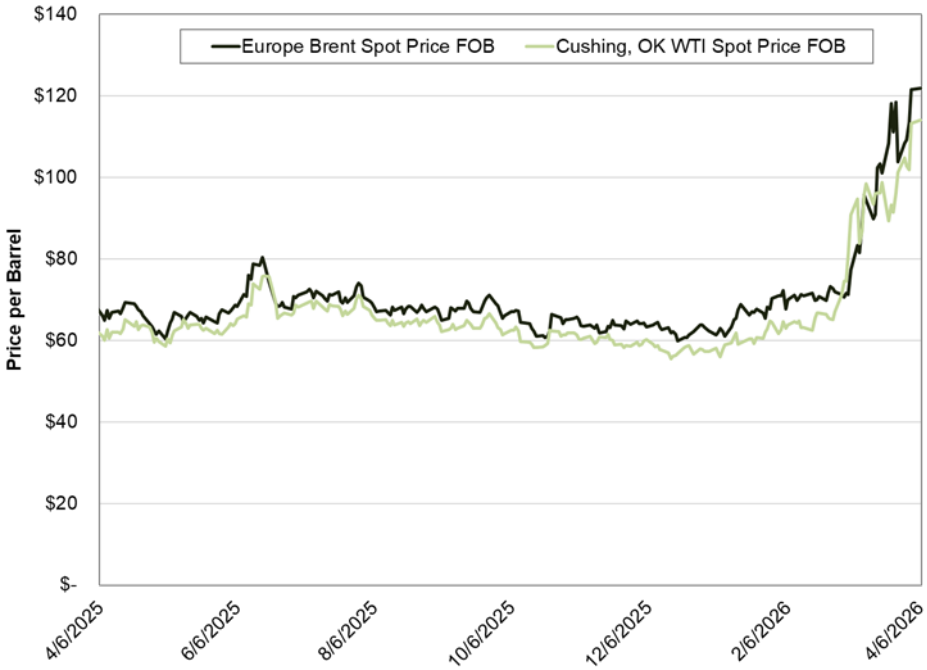
[6] Federal Reserve Bank of Philadelphia, Survey of Professional Forecasters, First Quarter 2026, released Mar. 6, 2026, at 4.

from December 2024 to December 2025 on the back of a nearly 41.9 percent increase in wholesale natural gas prices during the same period.

Q. HAVE ANY RECENT DEVELOPMENTS INCREASED MARKET UNCERTAINTY?

A. Yes. Recent geopolitical and macroeconomic developments have increased uncertainty in energy markets and prices in a way that is relevant to consumer affordability. The most notable of these is the geopolitical conflict in the Persian Gulf affecting energy prices. Currently it is unknown what the lasting impact of this conflict will have on global markets, as this will be heavily influenced by how long the conflict continues. However, initial impacts on international and domestic markets present a word of caution.

Figure 3: Crude Oil Prices



Source: S&P Global

Q. HOW HAS CONFLICT IN THE PERSIAN GULF AFFECTED MARKET UNCERTAINTY?

A. Yes, as shown in Figure 3 above, the conflict in the Persian Gulf has contributed to recent elevated crude oil prices in both international and domestic markets. International crude oil prices

measured at the Brent hub in the North Sea has increased by more than 78.9 percent since the beginning of the recent conflict. Likewise, domestic crude oil prices measured in terms of West Texas Intermediate ("WTI") have increased by nearly 70.3 percent since the beginning of the recent conflict. Both indexes are now trading in excess of $100 per barrel, well above the historic range of $60-$80 per barrel that is normally seen for these commodities.

Q. WHY ARE INCREASES IN CRUDE OIL PRICES IMPORTANT TO THE CONTEXT OF THE CURRENT RATE PROCEEDING?

A. The observed increase in crude oil prices shows how price shocks caused by the conflict in the Persian Gulf will likely filter through the larger macroeconomy. While the US does not purchase significant volumes of crude from the Persian Gulf anymore, the Persian Gulf is a major supplier of crude oil internationally, and crude oil is an international commodity. Therefore, domestic crude prices have already increased to reflect the knowledge that domestic supplies will be diverted in the international marketplace to take up the slack from constrained international supplies. Besides directly impacting Pennsylvanians through higher retail gasoline prices, higher crude prices will likely impact other aspects of the daily lives of Pennsylvanians already struggling under lingering inflation concerns. In fact, the Energy Information Administration recently found that domestic gasoline prices are now more closely tied to Brent Oil prices than WTI prices.[7]

Q. COULD INCREASED OIL PRICES AFFECT AFFORDABILITY CONCERNS FOR NFG CUSTOMERS?

A. Yes. First, the conflict in the Persian Gulf has restricted the flow of not only crude oil, but also Liquified Natural Gas ("LNG") supplies from the Persian Gulf to consumers in Asia. It is

[7] U.S. Energy Information Administration, "U.S. gasoline prices move with Brent rather than WTI crude oil," Today in Energy, dated Nov. 3, 2014.

likely that these consumers will turn to alternative supplies from the US as stored supplies dwindle. This will, in turn, place upward pressures on wholesale natural gas prices in the US as more natural gas is diverted to international supplies. Likewise, higher crude oil prices will lead to higher refined gasoline and diesel prices which themselves will lead to higher retail prices due to increased transportation costs. In the same Federal Reserve press conference discussed earlier, Chairman Powell stated that these elevated energy prices will push up overall inflation in the near term, but the scope and duration of these effects are uncertain.[8]

Q. IS THERE SIGNIFICANT UNCERTAINTY REGARDING HOW THE CURRENT CONFLICT WILL IMPACT THE ECONOMY?

A. Yes. As stated earlier, the ultimate impact of the recent conflict in the Persian Gulf is hard to predict because it is heavily determined by the ultimate length of the conflict, and how quickly international commodity markets can return to normal. Indeed, Chairman Powell when asked if he believed the oil shock would be temporary, replied, "So, and the thing I really want to emphasize is that nobody knows. The economics effect could be bigger, they could be smaller, they could be much smaller or much bigger. We just don't know."[9]

Q. ARE THERE ANY OTHER RELEVANT INDICATORS OF MARKET UNCERTAINTY?

A. Yes. The VIX index represents a market of financial derivatives of S&P 500 traded on the CME Group and is therefore a commonly used measure of expected near-term stock market volatility, as financial derivatives, such as options, become more valuable during periods of

[8] Board of Governors of the Federal Reserve System, Transcript of Chair Powell's Press Conference, Mar. 18, 2026, at 2.

[9] Board of Governors of the Federal Reserve System, Transcript of Chair Powell's Press Conference, Mar. 18, 2026, at 6.

uncertainty. The VIX index has seen a 50 percent increase in value since the start of the recent conflict in the Persian Gulf, indicating elevated concern regarding future stock market volatility. I have also reviewed the Federal Reserve Bank of Philadelphia's Survey of Professional Forecasters regarding growth and the likelihood of negative real GDP growth.

Q. WHAT DOES THE SURVEY OF PROFESSIONAL ECONOMISTS INDICATE?

A. The most recent survey presented a mixed picture. Forecasters increased their annual-average real GDP forecast for 2026 from 1.8 percent to 2.5 percent. However, they continued to assign a meaningful probability to a negative quarter of real GDP growth in 2026, with mean probabilities ranging from approximately 17.8 percent to 22.7 percent over the four quarters.[10] Assuming that each of these four probabilities is independent for illustrative purposes, this forecasts a 60.1 percent likelihood of a negative real GDP growth quarter in 2026. In my view, that does not establish that a recession is likely, but it does suggest that the outlook remains uncertain enough to support caution.

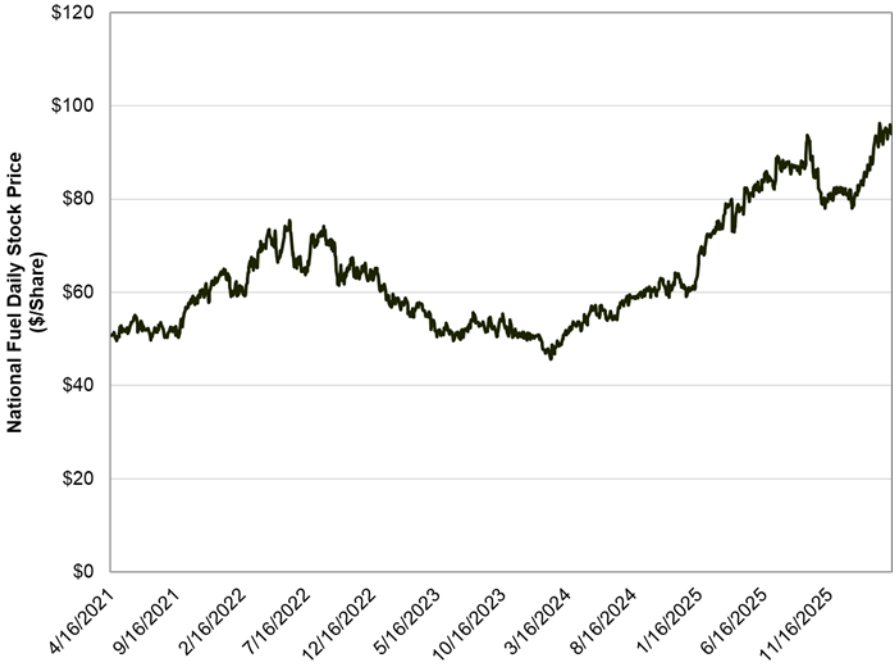
Q. HAVE TARIFFS ALSO AFFECTED AFFORDABILITY CONCERNS?

A. Although often lost in the current discussion regarding price concerns caused by the recent conflict in the Persian Gulf, it should be recognized that markets are also still dealing with uncertainty from recent tariffs placed on imports. Chairman Powell stated that of the Federal Reserve's 3.0 percent core inflation estimate, between .50 and .75 percentage points are due to

[10] Federal Reserve Bank of Philadelphia, Survey of Professional Forecasters, First Quarter 2026, at 1, 6.

tariffs.[11] Federal Reserve materials indicate that those effects developed gradually rather than as a single price spike, and that some of the tariff increases were passed through to consumers.[12]

Figure 4: National Fuel Stock Price



Source: S&P Global

Q. HAS THE CURRENT FINANCIAL UNCERTAINTY CAUSED FINANCIAL STRUGGLES FOR THE COMPANY?

A. No, it does not appear that the Company has been experiencing significant financial concerns due to the recent macroeconomic concerns. Indeed, National Fuel, the Company's parent entity, has seen its stock price trending upward for several years, and on March 13, 2026, National Fuel's stock price reached an all-time high of $96.30 per share. As of April 10, 2026, National

[11] Board of Governors of the Federal Reserve System, Transcript of Chair Powell's Press Conference, Mar. 18, 2026, at 4.

[12] Board of Governors of the Federal Reserve System, The Slow Climb: How Tariffs Gradually Raised Retail Prices in 2025, FEDS Notes, March 5, 2026.

Fuel's stock is trading near this record high at $93.95 per share. This indicates that the Company is not in a position of obvious market distress.

Q. WHAT IS YOUR RECOMMENDATION BASED ON CURRENT MACROECONOMIC CONDITIONS?

A. I recommend that the Commission take into consideration current macroeconomic conditions, including consumer affordability concerns, when determining just and reasonable rates for the Company. Average Pennsylvanians are still struggling with lingering inflation concerns besides looking at potential additional concerns placed on them due to the current conflict in the Persian Gulf. This is while National Fuel has seen increasing stock prices for its shareholders and no obvious market distress. The Commission, in particular, should require some level of shared burden, balancing consumer affordability concerns with the financial interests of the Company.

IV. REGULATORY LAG

Q. PLEASE DISCUSS THE COMPANY'S REVENUE STABILITY CONCERNS.

A. The Company's testimony reflects a focus on improving revenue stability and predictability under its current rate structure. The Company explains that weather-driven usage fluctuations can result in periods of under-recovery during warmer-than-normal conditions and over-recovery during colder-than-normal conditions.[13] To address this variability, the Company proposes to make its WNA mechanism permanent.[14] The Company also states that the primary purpose of the WNA is to moderate the bill impacts of weather variability and align billed revenues more closely with the Commission-approved revenue requirement.[15]

[13] Direct Testimony of John D. Taylor, Company St. 19 at 26:5-9.

[14] Direct Testimony of John D. Taylor, Company St. 19 at 23:7-10.

[15] Direct Testimony of John D. Taylor, Company St. 19 at 23:15 to 24:3.

Q. DOES THE COMPANY ALREADY HAVE MECHANISMS IN PLACE THAT REDUCE REGULATORY LAG?

A. Yes. The Company proposes to use a Fully Projected Future Test Year ("FPFTY") to better align revenues with projected costs in the current rate case,[16] and the Company's prior base rate case also utilized a FPFTY.[17] The Company also has also recently implemented a DSIC, which allows for interim recovery of qualifying capital investments between rate cases.[18] These tools provide the Company with multiple avenues to manage regulatory lag and ensure timely cost recovery. The proposed continuation of the WNA would further enhance this framework.

Q. DO CHANGES IN CUSTOMER USAGE NECESSARILY REFLECT REGULATORY LAG?

A. No. Declines in usage can result from a range of factors, including efficiency measures, economic conditions, or customer behavior. These changes are not inherently problematic and do not, by themselves, create regulatory lag. Moreover, if usage declines are accompanied by stable or declining costs, there may be no mismatch that requires correction.

Q. PLEASE DEFINE REGULATORY LAG.

A. Regulatory lag can be defined in several different ways. One definition holds that regulatory lag is the time period between when a utility's rates go into effect, following an evidentiary hearing process and its next rate case.[19] Another definition holds that regulatory lag can be represented as the period between when a utility investment is undertaken and the time it

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[16] Direct Testimony of Rebecca E. Hillery, Company St. 1 at 5:24 to 6:2.

[17] *See* Direct Testimony of Rebecca E. Hillery, Company St. 1 at 14:2-4.

[18] Direct Testimony of Rebecca E. Hillery, Company St. 1 at 14:16-17.

[19] Scott E. Atkinson and Clifford Nowell. (1994). "Explaining Regulatory Commission Behavior in the Electric Utility Industry." *Southern Economic Journal*. Vol. 60, No. 3: 634-643.

enters into rates.[20] Yet another definition holds that regulatory lag is the time period in which a utility's achieved rate of return differs from that allowed by regulators.[21] At the heart of all these definitions is one theme: the frequency and timing of rate cases can impact utility earnings, positively or negatively.

Q. IN UTILITY RATE REGULATION, WHICH PARTY CONTROLS REGULATORY LAG OR THE DURATION OF TIME BETWEEN RATE CASES?

A. Typically, utilities control the duration between rate cases. In most states, utilities have the statutory ability to request rate increases if they believe that their rates are not affording them the opportunity to earn a fair return on and of their investments and prudently incurred costs. While state utility commissions and other stakeholders can, in theory, request a utility be "brought in" for a rate case, my experience is, and research indicates, that this event rarely happens. For instance, research on the topic of regulatory lag conducted in the early 1980s by Ronald Braeutigam and James Quirk, surveyed state utility rate cases during the period 1948 to 1978 and found that over 350 of the 363 surveyed rate cases (96 percent) were brought by a regulated utility, with the smaller number attributable to regulators or consumer groups.[22] While this is an older, dated study, the results are likely to ring true even over the past two decades.

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[20] Elizabeth E. Bailey and Roger D. Coleman.(1971). "The Effect of Lagged Regulation in an Averch- Johnson Model." *Bell Journal of Economics and Management Sciences*. 2 (Spring): 278-292.

[21] A.K. Klevorick. (1973). "The Behavior of a Firm Subject to Stochastic Regulatory Review," *Bell Journal of Economics and Management Science* 4 (Spring): 82.

[22] Graeme Guthrie. (2006) "Regulating Infrastructure: The Impact on Risk and Investment." *Journal of Economic Literature*. 44 (December): 933.

Q. DOES A UTILITY'S ABILITY TO DETERMINE THE TIMING OF A RATE CASE SHIFT A CERTAIN DEGREE OF REGULATORY RISK ONTO RATEPAYERS?

A. Yes. When the timing of a rate case is left in the hands of the utility, it has the ability to effectively shift the risk of regulation and regulatory lag away from itself and onto ratepayers. The option to request higher rates by utilities, in effect, creates a price floor that buttresses a utility's value.[23] This price floor allows shareholders to retain benefits created by regulatory lag (*i.e.*, earning an actual rate of return that is higher than the authorized rate of return or over-earning), as well as the option to defend against challenges to those benefits through the timing of a rate case. Paul Joskow, writing as early as 1973, concluded in a frequently referenced regulatory article, that utility commissions tend to defend against rate increases, but are less aggressive in pursuing rate decreases when rates are stable or decreasing in real terms.[24] This outcome has often been thought to have occurred in the post-war period until about the late 1960s, and arguably throughout the 1990s.

Q. IS REGULATORY LAG UNFAIR OR CONFISCATORY TO UTILITIES?

A. No. The premise that regulatory lag is somehow unfair is simply antithetical to most of the research in utility regulation over the past 50 years. Regulatory lag has long been recognized as a key component of the overall regulatory compact given the discipline it can impose on utility operational and investment decisions. Regulation acts as a substitute for the disciplines of competition.[25] Regulatory lag prevents utility regulation from devolving into a "cost-plus"

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[23] Graeme Guthrie. (2006) "Regulating Infrastructure: The Impact on Risk and Investment." *Journal of Economic Literature*. 44 (December):925-972.

[24] Paul L. Joskow. (1973) "Pricing Decisions of Regulated Firms: A Behavioral Approach." *The Bell Journal of Economics and Management Science*. 4 (Spring):118-140.

[25] Charles F. Phillips, *The Regulation of Public Utilities: Theory and Practice*, (Arlington, VA: Public Utilities Reports, Inc., 1984), p. 154.

approach that simply passes through costs on a dollar-for-dollar basis to ratepayers and can lead to cost and investment inefficiencies. The cost-plus regulatory approach also shifts a considerable amount of performance-related risk away from utilities and onto ratepayers and leads to inefficient outcomes, which was recognized as early as the 1960s and has come to be known as the "Averch-Johnson" or "A-J" effect.

Q. HOW ARE THE CONCLUSIONS REGARDING REGULATORY LAG RELATED TO WHAT IS COMMONLY REFERRED TO AS THE "A-J EFFECT"?

A. In the early 1960s, a seminal article was published that dramatically influenced the theory and practice of utility regulation and economic thinking regarding the optimal regulation of natural monopolies. This article, authored by Professors Harvey Averch and Leland Johnson, and published in the *American Economic Review* in 1962, posited that rate of return regulation creates an incentive for regulated utilities to overcapitalize, resulting in an inefficient utilization of resources and higher-than-optimal rates.[26] This finding; however, was premised upon a model with a number of assumptions, one of which presumed there was no regulatory lag and that rates were set on a period-to-period basis. In other words, rates were set on a "cost-plus" regulatory approach.

Q. HOW IS REGULATORY LAG RELATED TO THIS RESEARCH?

A. Soon after its publication, Averch and Johnson's article was met with a flurry of scholarly research attempting to empirically verify the A-J effect, as well as examining the conditions under which the effect would, and would not, be sustained.[27] Rejoinders to the research noted that two

[26] H. Averch and L. Johnson. (1962) "Behavior of the Firm under Regulatory Constraint," *American Economic Review*. 52:1052-1069.

[27] These works are surveyed in Graeme Guthrie. (2006). "Regulating Infrastructure: The Impact on Risk and Investment." *Journal of Economic Literature*. 44 (December):925-972.

characteristics of the regulatory process tended to temper the likelihood and prevalence of the A-J effect: (1) the possibility of disallowances through the prudence review process[28] and (2) the positive efficiency incentives created by regulatory lag.[29] In fact, a series of articles published soon afterwards noted that regulatory lag typically creates incentives for utilities to seek efficiency opportunities between rate cases since the gains (profits) from those investments inure to shareholders instead of ratepayers.[30]

Q. HOW DID THE FINDINGS IDENTIFYING THE BENEFITS OF REGULATORY LAG ARISE?

A. One of the earliest works on the impact of regulatory lag was published in 1971 by William Baumol and Alvin Klevorick.[31] Their work was the first of what was to become a series of articles showing that regulatory lag actually diminished incentives for overcapitalization, since the earnings gained by avoiding these inefficient actions passed directly to shareholders. Soon after, Klevorick, writing separately from Baumol, built upon this model by explaining how multi-year regulatory lags, coupled with demand and cost uncertainty, created strong incentives for efficiency

[28] A.K. Klevorick. (1973). "The Behavior of a Firm Subject to Stochastic Regulatory Review," *Bell Journal of Economics and Management Science.* 4 (Spring): 82. P. Joskow. (1974). "Inflation and Environmental Concern: Structural Change in the Process of Public Utility Regulation." *Journal of Law and Economics*, Vol. 17: 291-327. R.J. Gilbert and D.M. Newbery.(1988). *Regulation Games*. Working Paper 8879, University of California Berkeley, June 16.T.P. Lyons. (1991.) "Regulation with 20-20 Hindsight: 'Heads I Win, Tails You Lose'?" *Rand Journal of Economics*. Vol. 22 (Winter): 581-595.

[29] Elizabeth E. Bailey and Roger D. Coleman.(1971). "The Effect of Lagged Regulation in an Averch- Johnson Model."*Bell Journal of Economics and Management Sciences*. 2 (Spring): 278-292.

[30] W.K. Viscusi, J.M. Vernon, J.R. Harrington, Jr. (1997) *Economics of Regulation and Antitrust*, Second Edition. Cambridge: MA: MIT Press, 380. See also the works surveyed in Graeme Guthrie. (2006). "Regulating Infrastructure: The Impact on Risk and Investment." *Journal of Economic Literature*. 44 (December):925-972.

[31] William J. Baumol and Alvin K. Klevorick. (1970). "Input Choices and Rate-of-Return Regulation: An Overview of the Discussion." *The Bell Journal of Economics and Management Science*. 1 (Autumn):162-190.

to maintain profitability.[32] One of his additional findings at the time, however, was that these incentives might also discourage regulated firms from investing in research and development.

Q. HOW IS THIS DISCUSSION RELEVANT TO THE COMPANY'S CURRENT FILING?

A. The Company's filing focuses on concerns related to revenue variability and stability. However, as discussed above, regulatory lag can serve a beneficial regulatory function and does not, by itself, indicate a structural problem. NFG's ability to file rate cases at will, utilize a WNA, utilize FPFTYs (including allowing end-year rate base calculations as opposed to average rate base over the FPFTY), and recover infrastructure costs through the DSIC already provide mechanisms to reduce lag. As such, the insinuation that regulatory lag is a barrier to fair return is inconsistent with both its regulatory tools and academic literature.

Q. DOES REGULATORY LAG, WHILE ENCOURAGING EFFICIENCY, DISCOURAGE INNOVATION?

A. No. Interestingly, this notion is a myth that arises in the practice of public utility regulation but is debunked by several academic articles. Elizabeth Bailey, who also served as an economic researcher at Bell Laboratories, addressed this issue originally raised by Klevorick during this active period of regulatory scholarship in the 1960s and 1970s. Bailey found that regulatory lag helped to facilitate, not reduce, the incentives for cost-reducing innovations.[33] Bailey's work built upon earlier work that she did with Roger Coleman in 1971 that further supported the conclusions

[32] A.K. Klevorick. (1973). "The Behavior of a Firm Subject to Stochastic Regulatory Review," *Bell Journal of Economics and Management Science.* 4 (Spring): 82.

[33] Elizabeth E. Bailey. (1974). "Innovation and Regulation." *Journal of Public Economics*. 3: 285-295.

of Baumol and Klevorick, that regulatory lag induces profit-maximizing firms to adopt minimum-cost production alternatives.[34]

Q. ARE THERE ANY PARALLELS AMONG REGULATORY LAG, INNOVATION, RELIABILITY, AND SAFETY?

A. Yes. The Company links its increased capital investments for safety, reliability, and system modernization to concerns about revenue stability under its current rate design. At the same time, the Company proposes to use mechanisms such as the WNA to stabilize revenues and support recovery despite external factors like weather variability. Accordingly, while these concepts are related, the Company's existing mechanisms are designed to address the identified risks within the current ratemaking framework.[35] However, it should be recognized that the key benefits of regulatory lag are the weakening of the natural incentive for a utility to over-capitalize and the strengthening of the natural incentive for a utility to minimize production costs in order to increase shareholder profits.

Q. PLEASE EXPLAIN THE TERM "REGULATORY COMPACT."

A. The regulatory compact, as it is generally referred to in a regulatory policy context, allows utilities the opportunity to earn a fair rate of return of and on their investments as well as their prudently incurred costs. In return, utilities are expected to provide safe, adequate, efficient, and reasonable service and facilities at just and reasonable rates.

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[34] Elizabeth E. Bailey and Roger D. Coleman.(1971). "The Effect of Lagged Regulation in an Averch- Johnson Model." *Bell Journal of Economics and Management Sciences*. 2 (Spring): 278-292.

[35] *See* Direct Testimony of Rebecca Hillery, Company Statement 1 at 14:2-7 and 16:12-19.

Q. HAVE ANY STUDIES LOOKED AT THE IMPACT OF REGULATORY LAG FROM A BROAD INDUSTRY-WIDE PERSPECTIVE DURING THESE PAST PERIODS?

A. Yes, there have been a few studies that have examined regulatory lag during the inflationary period of the 1970s. The conclusions are mixed. Seth Norton, for instance, conducted empirical research examining 45 utilities over a period from 1945 to 1974. The period spans both the high-growth, high-productivity, low-cost periods for the industry prior to 1970 and the inflationary low-growth periods throughout the 1970s. According to Norton, there were no significant financial impediments or opportunities created by regulatory lag in any of these periods.[36]

Q. WILL THE COMPANY'S PROPOSALS SHIFT ANY RISKS AWAY FROM ITSELF AND ONTO RATEPAYERS?

A. Yes. The Company's proposals are designed to insulate the Company from fluctuations in usage and weather-related variability. By guaranteeing recovery of authorized revenues regardless of actual customer consumption, these mechanisms significantly reduce the Company's exposure to traditional business risks. As a result, the risk of revenue underperformance due to declining sales, conservation, economic conditions, or unseasonably warm weather is shifted entirely onto ratepayers. Importantly, the Company has not proposed any corresponding ratepayer protections such as earnings tests, revenue caps, or performance incentives. This asymmetric risk allocation leaves ratepayers exposed to upward rate adjustments without any assurance of offsetting benefits or improved utility performance.

[36] Seth W. Norton, (1987), "In Search of Regulatory Lag," *Quarterly Journal of Business and Economics*, Vol. 26 No. 4 (Autumn): 3-16.

Q. PLEASE EXPLAIN HOW REGULATORY RISK IS SHIFTED TO RATEPAYERS.

A. As I discussed above, utilities typically control the timing of rate case filings. Accordingly, utilities enjoy the ability to request higher rates, as well as the protection afforded by a price floor that allows shareholders to retain benefits (*i.e.*, over-earning) created by regulatory lag. Thus, in times of over-earning, risk is shifted to ratepayers because utilities are not likely to elect to file a rate case. In times where a utility is under-earning, risk also is shifted to ratepayers because the utility can file for a rate increase.

Q. DOES THE PRESENCE OF REGULATORY LAG CREATE ANY POLICY SUPPORT FOR THE COMPANY'S PROPOSALS?

A. No. The presence of regulatory lag in and of itself does not create policy justification for the Company's proposals. Regulatory lag can lead to both costs and benefits for a regulated utility. The Company's proposals are incorrectly premised upon a presumption that regulatory lag is bad and always will be bad. Regulatory lag creates opportunities for utilities to achieve gains as well as losses. The simple fact that regulatory lag creates "opportunities" and not guarantees, is one of the reasons why regulatory lag is considered efficiency enhancing. There is a long and rich history in the practice and theory of utility regulation supporting these efficiency-enhancing conclusions. Thus, there is no inherent nor *a priori* policy rationale supporting the Company's proposals. If anything, past thought and practice in utility regulation supports rejection of proposals of this nature on a policy basis.

Q. WHAT IS YOUR OVERALL RECOMMENDATION REGARDING REGULATORY LAG?

A. The Company has not demonstrated that the existing regulatory framework in Pennsylvania is failing to support timely and adequate cost recovery. Rather, the evidence suggests that

regulatory lag is already being effectively managed. The Commission should reaffirm the value of regulatory lag as a structural feature of traditional ratemaking and recognize that further erosion of this principle is neither necessary nor justified in this case.

V. WEATHER NORMALIZATION PROPOSAL

Q PLEASE DISCUSS NFG's WNA.

A. NFG's WNA is a pilot ratemaking mechanism that adjusts customer bills during the heating season (October through May) based on deviations from what the Company defines as "normal" weather.[37] Specifically, the mechanism applies a formula using the ratio of normal heating degree days ("NHDDs") to actual heating degree days ("AHDDs") and applies that ratio to each customer's heating-related usage to generate either a credit or a surcharge on the customer's bill.[38] A three-percent deadband is used to prevent minor weather variations from triggering bill changes.[39] The WNA is limited to weather-related usage changes and applies to Residential and Commercial/Public Authority customers.[40]

Q. WHY ARE WEATHER NORMALIZATION ADJUSTMENTS TYPICALLY USED BY GAS UTILITIES?

A. Weather normalization adjustments are generally used to reduce revenue volatility that results from fluctuations in weather which can lower customer gas usage and thus reduce a utility's recovery of fixed costs through volumetric rates. The intent is to provide more predictable revenues for the utility while smoothing customer bills. However, this goal must be balanced with

[37] *See,* Direct Testimony of John Taylor, Company Statement No. 19 at 23:13-15.

[38] *See,* Direct Testimony of John Taylor, Company Statement 19 at 24:13-15.

[39] *See,* Direct Testimony of John Taylor, Company Statement 19 at 24:16-19.

[40] *See,* Direct Testimony of John Taylor, Company Statement 19 at 24:20-21.

customer protections to ensure the mechanism does not systematically overcharge customers or remove all utility risk.

Q. CAN UTILITIES SMOOTH CUSTOMER BILLS WITHOUT A WNA?

A. Yes. Utilities typically offer normalized billing, also referred to as budget billing, to customers interested in establishing fixed monthly bills for purposes of budgeting by averaging expected annual utility charges over twelve equal monthly payments. Normalized billing also assists the utility by providing greater certainty regarding its monthly revenue streams from customers.

Q. WHAT IS THE COMPANY PROPOSING IN THIS CASE WITH RESPECT TO THE WNA?

A. The Company is proposing to convert its current WNA pilot program into a permanent, ongoing ratemaking mechanism.[41] However, the Company proposes no other changes to the WNA from its current pilot framework, save for changing the basis for calculating NHDDs from the current method based on a historic 15-year average to a 10-year average.[42]

Q. WHAT ARE THE PRACTICAL EFFECTS FOR RATEPAYERS ASSOCIATED WITH THE PROPOSED CHANGE IN WNA NORMALIZATION PERIODS?

A. In direct testimony NFG testified that assuming that a 10-year historical average will better reflect future weather conditions when compared to a 15-year historical average,[43] the proposed change in the Company's weather normalization should reduce future volumetric differences

[41] *See* Direct Testimony of John Taylor, Company Statement 19 at 23:7-10.

[42] *See* Direct Testimony of John Taylor, Company Statement 19 at 25:7-8.

[43] Direct Testimony of John Taylor, Company Statement No. 19 at 25:13-15.

between actual and normal usage due to weather conditions.[44] Theoretically, this should also reduce the volatility of future WNA surcharges and credits. The Commission accepted a similar proposed change to a 10-year normalization period recently for Columbia Gas, noting that normalization periods longer than 10-years appeared to result in a "historical bias" that diminished recent warming trends.[45]

Q. HAS THE COMMISSION ADOPTED A STATEMENT OF POLICY REGARDING ALTERNATIVE RATEMAKING MECHANISMS LIKE THE WNA?

A. Yes. In 52 Pa. Code § 69.3302(a) the Commission established 14 separate distribution rate considerations in determining just and reasonable alternative ratemaking distribution mechanisms and rate design. Exhibit MWD-1 presents these 14 considerations, along with the relevant effect of the WNA on each consideration. My review of the Commission's consideration criteria finds that the current WNA either does not impact the Commission's areas of concern or will potentially worsen those areas of concern.

Q. WHAT DID THE COMMISSION DECIDE REGARDING THE WNA IN THE COMPANY'S PRIOR RATE CASE?

A. In its Final Order, the Commission adopted a settlement that included implementation of the Company's WNA as a five-year pilot program.[46] The settlement also required the Company to include a three percent deadband and to comply with certain reporting requirements.[47] It further

[44] *Id.*

[45] Pennsylvania Public Utility Commission, Docket No. R-2025-3053499, Opinion and Order at 302.

[46] Pennsylvania Public Utility Commission, *Order.* Docket No. R-2022-3035730 ¶ 1. Pennsylvania Public Utility Commission, *Recommended Decision.* Docket No. R-2022-3035730 at ¶ 41.

[47] Pennsylvania Public Utility Commission, *Recommended Decision.* Docket No. R-2022-3035730 at ¶ 41-43.

provides that the continuation of the WNA pilot may be challenged or modified in future general rate proceedings.[48]

Q. WHAT IS THE EFFECT OF THE COMPANY'S PROPOSAL IN THIS PROCEEDING TO MODIFY THE WNA PILOT INTO A PERMANENT RATEMAKING MECHANISM?

A. The Company's proposal would lock in place a relatively new pilot mechanism as a permanent ratemaking mechanism before it has been subject to meaningful evaluation. The WNA has consistently produced net surcharges for customers and operates without key safeguards such as reconciliation, earnings tests, or weather trend adjustments. By seeking to convert the WNA from a pilot into a permanent ratemaking mechanism, the Company is effectively attempting to shield itself from weather-driven sales risk indefinitely, while continuing to recover fixed costs through volumetric charges. This conversion would institutionalize an asymmetric mechanism that benefits the utility without demonstrating corresponding benefits to ratepayers.

Table 1: Summary of WNA Annual Reports

	Heating Season		
	2023-2024	2024-2025	2025-2026
OCT	$ 112,758	$ 347,315	$ 291,162
NOV	179,872	1,051,095	(298,215)
DEC	314,620	109,846	(1,198,284)
JAN	1,010,020	(240,353)	(464,332)
FEB	1,237,993	(310,213)	(2,015,891)
MAR	2,361,861	580,910	-
APR	702,191	608,196	-
MAY	1,078,972	48,505	-
Heating Season Total	**$6,998,287**	**$2,195,302**	**$(3,685,560)**
Billing Cycle Adjustments (Jun–Sept)	$ (78,094)	$ (8,520)	-

Source: Company's Response to Data Request OCA-9-38.

[48] Pennsylvania Public Utility Commission, *Recommended Decision.* Docket No. R-2022-3035730 at ¶ 41.

Q. WHAT HAS BEEN THE ACTUAL IMPACT OF THE WNA ON RATEPAYERS?

A. The Company has filed annual WNA reports with the Commission that summarize the total dollar amount of WNA charges and credits issued to customers during each heating season.[49] Table 1 includes a summary of the over/under collections reported by the Company since the inception of the mechanism in October 2023. The monthly mechanism resulted in an overall surcharge each and every month of its first year of operations. Indeed, while customers did see overall credits during the months of January and February 2025, during the first two full heating seasons, 2023-2024 and 2024-2025, the WNA produced net surcharges across all residential customers of approximately $7.0 million and $2.2 million, respectively, resulting in approximately $9.2 million in total revenues collected from customers. Although certain months reflected bill credits, the WNA has produced substantial net surcharges to customers during its initial years of operation. While Table 1 currently indicates a level of credits for 2026, there may be an increase in surcharges due to more recent data, and I will continue to update my testimony as data becomes available. While the Company describes the WNA as a symmetrical mechanism benefiting both the Company and customers,[50] the results to date show that customers have experienced significant net surcharges during the majority of the pilot period.

Q. ARE ONE-WAY SURCHARGE MECHANISMS CONSISTENT WITH SOUND REGULATORY POLICY?

A. No. Regulatory policy disfavors mechanisms that allow utilities to recover lost revenues or costs from customers without also exposing the utility to comparable downside risk or performance standards. The WNA, as designed and applied by the Company, operates as a one-

[49] Pennsylvania Public Utility Commission, *Weather Normalization Reports.* Docket No. R-2022-3035730.

[50] *See* Direct Testimony of Rebecca Hillery, Company Statement 1 at 18:20-21.

way ratchet. This violates basic ratemaking principles of fairness and reciprocity between ratepayers and shareholders. This also violates the Commission's concern listed in its alternative regulation consideration criteria that alternative ratemaking mechanisms include appropriate consumer protections to balance shareholder concerns regarding revenue stability with ratepayer concerns regarding overall rate increases.

Q. ARE THERE OTHER CONCERNS REGARDING THE WNA?

A. Yes. There are several concerns regarding the level of ratepayer protections included in the Company's WNA. Specifically, the WNA includes a three percent deadband and applies during an October through May heating season, both of which differ from protections that have been approved by the Commission in other Pennsylvania WNA mechanisms, including the Commission's recent decision modifying the WNA pilot mechanism for Columbia Gas in Docket No. R-2025-3053499. Exhibit MWD-2 provides a survey of recent Pennsylvania natural gas rate cases involving major investor-owned utilities that address WNA mechanisms and their related provisions.

Q. DO YOU AGREE WITH THE COMPANY'S THREE PERCENT DEADBAND?

A. No. As part of the settlement in the Company's prior rate case, the Company included a three percent deadband in its WNA.[51] However, more recent Commission decisions approving WNA pilot mechanisms have included a larger deadband, such as the five percent deadband approved in the recent Columbia Gas general rate proceeding.[52] Indeed, in that proceeding, the Commission explicitly held that a five percent deadband "adequately captures what could be

[51] Pennsylvania Public Utility Commission, *Recommended Decision.* Docket No. R-2022-3035730 at ¶ 41.

[52] Pennsylvania Public Utility Commission, *Opinion and Order.* Docket No. R-2025-3053499 at 301.

considered normal weather fluctuations in Pennsylvania."[53] The Commission further explained that a larger deadband places more responsibility for calculating and forecasting weather variations on the utility as a normal part of doing business.[54] Consistent with this reasoning, increasing the Company's deadband from three percent to five percent would provide greater protection to ratepayers and better align with the Commission's recent determination on this issue.

Q. DO YOU AGREE WITH THE COMPANY'S CURRENT WNA HEATING PERIOD OF OCTOBER THROUGH MAY?

A. No. I disagree with the inclusion of the months of October and May in the Company's WNA heating season period. The Fall month of October and the Spring month of May are best represented as shoulder months between the winter heating season and the summer cooling season which often sees little heating or cooling requirements for customers and customers only see heating use during years with early and/or late winters. The inclusion of these shoulder months within the Company's WNA heating season exposes ratepayers to unnecessary variation in the WNA by shifting the weather risk during these shoulder periods from the Company onto ratepayers.

[53] Pennsylvania Public Utility Commission, *Opinion and Order.* Docket No. R-2025-3053499 at 301.

[54] Pennsylvania Public Utility Commission, *Opinion and Order.* Docket No. R-2025-3053499 at 301.

Table 2: Analysis of Historic Weather Variability

	Standard Deviations			Coefficient
	-1	0	1	Variation
OCT	263	338	414	22%
NOV	537	651	764	17%
DEC	809	942	1,075	14%
JAN	997	1,142	1,288	13%
FEB	873	1,050	1,228	17%
MAR	706	881	1,057	20%
APR	447	536	626	17%
MAY	171	232	293	26%

Source: National Oceanic and Atmospheric Administration, National Centers for Environmental Information, GHCN-Daily, Station USW00014860.

Q. HAVE YOU EXAMINED HISTORIC WEATHER VARIABILITY IN THE COMPANY'S SERVICE AREA DURING THE OCTOBER THROUGH MAY PERIOD?

A. Yes. Table 2 examines historical variation in monthly AHDD for the October through May period using weather data from the Erie, Pennsylvania weather station over the 15-year period October 2006 through May 2021. I have chosen weather data from Erie, Pennsylvania as this is consistent with the weather information that NFG uses to calculate its WNA surcharges and credits, although it is questionable if the city of Erie is representative of weather conditions for the Company's full service territory which serves customers as far south as Greene County, and as far east as Potter County in Pennsylvania. However, this analysis based on weather data from the Erie, Pennsylvania weather station finds that the coefficient of variation ("COV") for AHDD is greatest in the months of October and May.

Q. WHAT DO YOU MEAN BY THE COEFFICIENT OF VARIATION?

A. COV is mathematically the standard deviation of a data series divided by its mean and is a way to present the variance of different data series on a normalized basis as a percent of the average of the data series. For example, the COV of AHDD for the month of May is 26 percent, meaning

that the average expected variance in AHDD during the month of May is 26 percent of the expected NHDD based on historic averages. Likewise, the COV of AHDD for the month of October is 22 percent of expected NHDD based on historic averages. The COV for all other months is no greater than 20 percent. Therefore, the Commission should eliminate the months of October and May from the WNA period since these months have seen high variability in weather conditions.

Q. HAS THE COMMISSION EXPRESSED SIMILAR CONCERNS REGARDING THE INCLUSION OF NON-WINTER MONTHS WITHIN WNA MECHANISMS?

A. Yes. In its recent decision involving Columbia Gas, the Commission agreed that the month of May should be removed from the WNA calculation. Specifically, the Commission explained that "May is not a winter or traditional heating month in Pennsylvania but more appropriately a shoulder month when customers can expect to start seeing their heating bills decline."[55] The Commission also noted that retaining May "could result in customers seeing WNA bill increases as late as June."[56]

Q. HAVE ANY OTHER PENNSYLVANIA UTILITIES LIMITED THE WNA HEATING SEASON TO EXCLUDE THE MONTH OF MAY?

A. Yes. In a 2025 general rate proceeding involving UGI Utilities, Inc. – Gas Division ("UGI Gas"), the Commission approved a settlement that modified UGI Gas's WNA pilot so that it no longer applies to May bills and instead applies only to bills rendered during the heating season October through April.[57] As shown in Exhibit MWD-2, among the Pennsylvania utilities included

[55] Pennsylvania Public Utility Commission, *Opinion and Order.* Docket No. R-2025-3053499 at 301.

[56] Pennsylvania Public Utility Commission, *Opinion and Order.* Docket No. R-2025-3053499 at pp. 301-302.

[57] Pennsylvania Public Utility Commission, *Order*. Docket No. R-2024-3052716 ¶ 1. Pennsylvania Public Utility Commission, *Recommended Decision.* Docket No. R-2024-3052716 at Section V, ¶ 58(b).

in the survey, Peoples Natural Gas Company is the only utility with a WNA that continues to include the month of May in its heating season.

Q. WHAT IS YOUR POSITION ON THE CONTINUATION OF THE COMPANY'S WNA?

A. I recommend that the Commission affirmatively discontinue the current WNA mechanism. The mechanism has failed to produce balanced outcomes for ratepayers, functioning as an asymmetric surcharge on customers' bills for the two full years the mechanism has been in operation, even though the mechanism was designed to symmetrically provide both surcharges and credits to customers. The WNA is also not required to address regulatory lag concerns of the Company given the Company's use of a FPFTY and DSIC. NFG's WNA impacts affordability as it makes it more difficult to provide customers with predictable and understandable price signals related to usage and could impede customer conservation efforts. It also shifts weather-related risks away from NFG and onto its customers. Given the macroeconomic risks that are already shifted to customers beyond direct utility rates through increased prices due to tariffs, increased oil prices due to wars in the middle east, and rising utility rates, NFG's WNA goes directly against affordability concerns for ratepayers.[58] This is especially true given that, over the life of NFG's pilot WNA, NFG has collected a significant amount more from ratepayers through charges than it has given back to them through credits. As such, NFG's WNA represents a harm to ratepayers. As the company is able to shift risk away from itself through rate filings and shift future weather related risk to customers through a WNA (as well as infrastructure risks through the DSIC), NFG's ratepayers are made responsible for NFG's risk through additional surcharges and are only credited

[58] Indeed, NFG states that a reason for the current proposed rate increase is due to inflationary pressures impacting the U.S. economy, the same inflationary pressures NFG ratepayers are experiencing outside of utility rates. *See,* Direct testimony of Rebecca E. Hillery, Company St. 1, at 7:1-5.

when NFG's weather-related risk does not materialize, which has not been the case generally in this pilot program.

Q. DO YOU HAVE ANY ALTERNATIVE PROPOSAL IF THE COMMISSION DECIDES TO CONTINUE THE WNA?

A. If the Commission decides to continue the WNA, I recommend that it be continued as a three-year pilot program rather than being adopted as a permanent mechanism. This will allow the Commission the opportunity to routinely reevaluate the WNA to ensure that the mechanism is not producing negative outcomes for ratepayers. I further recommend that the Commission increase the deadband from three percent to five percent and eliminate the months of October and May from the WNA period. This would strengthen ratepayer protections and would furthermore make the Company's WNA pilot consistent with the recent WNA pilot the Commission approved for Columbia Gas.

VI. ENERGY EFFICIENCY PROGRAM

Q. PLEASE DISCUSS THE COMPANY'S PROPOSED ENERGY EFFICIENCY PROGRAM.

A. The Company proposes implementing a comprehensive Energy Efficiency ("EE") Program over a five-year period beginning in October 2026.[59] The program will provide rebate incentives for residential customers seeking to install high-efficiency natural gas space and water heating appliances, as well as ENERGY STAR® certified natural gas clothes dryers.[60]

[59] Direct Testimony of Erik M. Solomon, Company St. 18 at 5:1-2.

[60] Direct Testimony of Erik M. Solomon, Company St. 18 at 5:2-15.

Q. HOW DOES THE COMPANY PROPOSE TO FUND ITS PROPOSED EE PROGRAM?

A. The Company proposes to recover the costs associated with its EE Program through a dedicated rider.[61] This rider will encompass all reasonable and prudently incurred costs directly associated with program administration, marketing, customer rebates, and evaluation activities.[62] Annual overspend or underspend will be carried forward throughout the five-year program term.[63]

Q. DO YOU AGREE WITH THE COMPANY'S PROPOSED EE PROGRAM RIDER MECHANISM?

A. No. The Company provides no reason for the need for a dedicated rider to recover costs associated with its proposed EE Program. Indeed, the proposed rider fails to adhere to the three criteria that regulators typically refer to when evaluating proposed cost recovery mechanisms.

Q. HOW HAS REGULATORY PRACTICE TRADITIONALLY EVALUATED COST RECOVERY REQUESTS?

A. Regulators often use three separate criteria to evaluate cost recovery mechanism requests that include determining whether or not the costs included in the requested cost recovery mechanism are: (1) largely outside the control of a utility (2) unpredictable and volatile, and (3) substantial and recurring.[64] These criteria resulted from a popular research paper published by the National Regulatory Research Institute ("NRRI"), the research organization supporting the National Association of Regulatory Utility Commissioners ("NARUC"). It is important to note

[61] Direct Testimony of Erik M. Solomon at, Company St. 1 6:4.

[62] Direct Testimony of Erik M. Solomon, Company St. 18 at 6:5-7.

[63] Direct Testimony of Erik M. Solomon, Company St. 18at 6:8-9.

[64] Costello, Ken (September 2009), "How Should Regulators View Cost Trackers?" National Regulatory Research Institute at 5.

that the NRRI-recommended evaluation criteria are minimum criteria, as they pertain to the threshold issue regarding the characteristics of costs suitable for recovery via a tracker. Thus, in the event that the NRRI-recommended criteria are satisfied, the next step is to determine whether the tracker proposal contains flaws unrelated to the characteristics of the costs intended for recovery.

Q. ARE THE PROPOSED EE PROGRAM COSTS BEYOND THE CONTROL OF COMPANY MANAGEMENT?

A. No. The Company proposes to directly administer the proposed EE Program. The Company will provide rebates directly to participating residential customers and has provided estimated participation levels[65] and annual budgets.[66]

Table 3: Projected Energy Efficiency Program Costs

Budget Item	FY 2027	FY 2028	FY 2029	FY 2030	FY 2031	Average
Rebates	$ 476,726	$ 476,726	$ 476,726	$ 476,726	$ 476,726	$ 476,726
Administration	100,000	100,000	100,000	100,000	100,000	$ 100,000
Evaluation, Measurement and Verification	60,000	60,000	60,000	60,000	60,000	$ 60,000
Outreach/Marketing/Trade Ally Co-op	100,000	85,000	75,000	50,000	50,000	$ 72,000
Total	**$ 736,726**	**$ 721,726**	**$ 711,726**	**$ 686,726**	**$ 686,726**	**$ 708,726**
					St. Dev.	**$ 19,647**
					COV:	**2.77%**
Requested Net Income	$ 50,185,000	$ 50,185,000	$ 50,185,000	$ 50,185,000	$ 50,185,000	$ 50,185,000
Percent EE Program of Net Income	**1.47%**	**1.44%**	**1.42%**	**1.37%**	**1.37%**	**1.41%**

Source: Direct Testimony of Erik M. Solomon, Company St. 18 Table 2.

Q. HAVE YOU EXAMINED THE SCOPE OF THE COMPANY'S PROPOSED EE PROGRAM?

A. Yes. Table 3 compares projected EE Program expenses to the Company's projected net income. Through the proposed five-year period, the Company proposes to incur approximately $700,000 in annual EE Program expenses. This represents approximately 1.4 percent of the

[65] Direct Testimony of Erik M. Solomon, Company St. 18 at 7.

[66] Direct Testimony of Erik M. Solomon, Company St. 18 at 6.

Company's estimated annual income and does not represent substantial costs for the Company justifying a cost recovery mechanism.

Q. HAVE OTHER REGULATORS ADOPTED A MATERIALITY THRESHOLD BASED ON UTILITY NET INCOME?

A. Yes. The Montana Public Service Commission ("MPSC"), in adopting a deadband associated with a cost recovery mechanism, recognized five percent of a utility's net income as a threshold for extraordinary costs that materially impact a utility's finances.[67] The MPSC's decision itself was based on a similar materiality standard used by the Federal Energy Regulatory Commission ("FERC") for extraordinary expenses.[68] The Company's proposed EE Program expenses do not rise to this level of materiality.

Q. ARE THE COMPANY'S PROPOSED EE PROGRAM EXPENSES EXPECTED TO BE VOLATILE AND UNPREDICTABLE?

A. No. First, the Company provides five-year budgets of projected costs under its proposed EE Program, indicating that the Company does not anticipate annual expenses associated with the proposed EE Program to be unexpected.[69] Similarly, the year-to-year expenditures estimated for the Company's proposed EE Program are relatively flat and not anticipated to be significantly volatile. Indeed, Table 3 shows that projected expenses associated with the Company's proposed EE Program are remarkably stable, with a projected coefficient of variation ("COV") of 2.8 percent.

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[67] In the Matter of the Montana Public Service Commission's Review of the Rates to Recover NorthWestern Energy's Electricity Supply Costs, Montana Public Service Commission Docket No. D2017.5.39, Order No. 7563c at ¶¶38, 47, and 49.

[68] In the Matter of the Montana Public Service Commission's Review of the Rates to Recover NorthWestern Energy's Electricity Supply Costs, Montana Public Service Commission Docket No. D2017.5.39, Order No. 7563c at ¶49

[69] Direct Testimony of Erik M. Solomon, Company St. 18 at 6.

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE PROPOSED EE PROGRAM RIDER?

A. I recommend the Commission reject the proposed EE Program rider. The proposed rider fails to satisfy any of the three NRRI-recommended evaluation criteria. Specifically, EE Program expenses are not substantial, not outside the control of the utility, and are neither unpredictable nor volatile. Therefore, the costs associated with the Company's proposed EE Program do not have the characteristics that are conducive for recovery through a cost tracker outside of base rates.

VII. ALLOCATED COST OF SERVICE STUDY

A. Introduction

Q. WHAT IS THE PURPOSE OF AN ALLOCATED COST OF SERVICE STUDY?

A. An allocated cost of service study ("ACOSS") is a modeling approach that reconciles utility costs and revenues across different customer classes. The goal of an ACOSS is to evaluate the cost of providing service and revenue responsibility for each individual customer class. ACOSS results are used to estimate class-specific rates of return and can serve as a guidepost for class revenue responsibilities and ultimately rates.

Q. HOW IS AN ACOSS PREPARED?

A. An ACOSS utilizes a set of historic or projected cost information which is (1) "functionalized," (2) "classified," and (3) "allocated." The functionalization process simply categorizes costs based upon the functions they serve within a utility's overall operations (i.e., production, transmission, and distribution). In the specific case of a natural gas utility, a large share of a utility's investments and costs are associated with providing distribution services. The classification process characterizes costs by "type," including those that are (1) demand-related,

(2) commodity-related, or (3) customer-related. The last step of the process "allocates" each of these costs to a respective jurisdiction or customer class as appropriate.

Q. PLEASE EXPLAIN DEMAND-RELATED COSTS?

A. Demand-related costs are associated with meeting maximum gas flow requirements. Transmission and large distribution mains are designed, in part, to meet peak demand day requirements such that natural gas can be delivered to households, businesses, and industries under peak load conditions. Gas supply contracts can also have a capacity component that is demand-related. The most common demand allocation factors used in an ACOSS are those related to system peak day demands.

Q. HOW ARE COMMODITY-RELATED COSTS DEFINED?

A. Commodity-related costs are defined as those that tend to change with the amount of throughput (volume) sold or transported. The investment cost of natural gas mains, for instance, can be allocated, in part, on some measure of throughput. There are also a number of other expenses, such as fuel costs themselves, that are often allocated using some measure of throughput.

Q. WHAT ABOUT CUSTOMER-RELATED COSTS?

A. Customer-related costs are those associated with connecting customers to the distribution system, metering household or business usage, and performing a variety of other customer support functions.

Q. PLEASE EXPLAIN THE ALLOCATION PROCESS.

A. The allocation process is the final step in a cost of service study and involves assigning each functionalized and classified cost component to the appropriate customer classes. In the Company's ACOSS, costs are allocated using factors that reflect the underlying cost drivers, including customer counts, peak demand contributions, commodity usage, and, in some cases,

revenues. Where costs can be directly attributed to a specific customer class, they are directly assigned. For costs that cannot be directly assigned, allocation factors are developed using economic and engineering principles to ensure that costs are distributed in a manner consistent with cost causation. The goal of the allocation process is to ensure that each customer class is assigned its proportionate share of the Company's total costs, based on how that class contributes to the need for those costs.

Q. IS THIS A RELATIVELY SIMPLE PROCESS?

A. No. Some costs can be clearly identified and directly assigned to a function or category, while other costs are more ambiguous and difficult to assign. The primary challenge in conducting an ACOSS is the treatment of what are known as "joint and common" costs. Given their shared or integrated nature, these joint and common costs can often be difficult to compartmentalize. Therefore, unique allocation factors are utilized in an ACOSS to classify joint and common costs. The process of developing these cost allocation factors can become subjective and is often imbued with policy considerations.

Q. HOW DOES AN ACOSS RELATE TO ECONOMIC PRINCIPLES?

A. An ACOSS is also referred to as a "fully allocated cost study" since it allocates test year revenues, rate base, expenses, and depreciation to various jurisdictions and customer classes based upon a series of different allocation factors. The purpose of the ACOSS is to develop cost responsibility estimates for each customer class, which in turn, can be used to develop rates. An ACOSS is based upon a set of historic utility book costs that have accumulated over decades. Rates are, therefore, based upon historic average costs; whereas economic theory suggests that the most efficient form of pricing in perfectly competitive markets should be based upon marginal costs. However, regulated utilities do not operate in perfectly competitive markets and, by their

very nature, are natural monopolies. Thus, reaching the ideal pricing formula outlined in economic theory is impossible since the nature of natural monopolies makes pricing in the presence of declining average costs, coupled with the presence of joint and common costs, difficult.

Q. WHAT CONTROVERSIES ARISE IN THE ANALYSIS AND COMPARISON OF VARIOUS ACOSS METHODOLOGIES?

A. The ACOSS process is significantly different than the revenue requirement or cost of capital phase of a typical rate case. While those activities are focused on determining the total level of revenues to be recovered, the ACOSS determines how those revenues are allocated across customer classes and ultimately recovered through rates. The primary controversies in evaluating different ACOSS methodologies for a natural gas utility generally center on which cost drivers should be emphasized in allocating distribution system costs. In particular, there is often disagreement regarding whether costs should be allocated based on customer counts, peak demand contributions, annual throughput, or some combination of these factors. For gas utilities, these issues are especially important because the system is designed to meet winter peak demand requirements, while a significant portion of costs are recovered through volumetric charges that vary with usage. As a result, different methodologies can produce materially different outcomes depending on how they treat peak demand versus throughput. For example, methodologies that rely more heavily on customer and peak demand factors tend to allocate a greater share of costs to lower load-factor customers, such as residential and small commercial classes, which place relatively high demands on the system during peak periods. Conversely, methodologies that incorporate throughput or average usage, such as Seaboard-type approaches[70], tend to shift costs

[70] *See*, Atlantic Seaboard Corp., 11 F.P.C. 43 (1952); The Atlantic Seaboard, or Seaboard, cost allocation method allocates costs associated with distribution mains to customer classes based on a simple average of the customer classes' contribution to system peak day demands and annual throughput requirements.

toward higher load-factor customers, such as larger commercial and industrial classes. These differences can be significant, and they often drive the core disputes in a cost of service study. Ultimately, the key issue is whether the selected methodology appropriately reflects cost causation—that is, whether it aligns the allocation of costs with the way the natural gas distribution system is actually designed, constructed, and operated to serve customers.

Q. PLEASE EXPLAIN WHY METHODOLOGIES THAT ARE SKEWED TOWARD PEAK CONSIDERATIONS SHIFT COSTS TOWARD LOWER LOAD-FACTOR CUSTOMERS SUCH AS RESIDENTIAL AND SMALL COMMERCIAL CUSTOMERS.

A. A large portion of residential and small commercial natural gas usage is highly weather-sensitive, particularly during the winter heating season. These customers tend to have usage patterns that are concentrated during cold weather periods, when heating demand is highest. In contrast, larger commercial and industrial customers often use natural gas for process loads that are less dependent on weather and tend to be more consistent throughout the day and across seasons. As a result, their usage profiles are generally more stable and less "peaked" than those of residential and small commercial customers. Because of these differences, residential and small commercial customers typically exhibit lower load factors, meaning a greater share of their total usage occurs during peak periods. Larger customers, by comparison, tend to have higher load factors, with usage that is more evenly distributed over time. When a cost allocation methodology places significant weight on peak demand, it assigns more costs to those customer classes that contribute more heavily to system peak requirements. Since residential and small commercial customers drive a substantial portion of winter peak demand, methodologies that emphasize peak considerations will tend to allocate a greater share of costs to those classes. Conversely, methodologies that incorporate average usage or throughput, such as peak and average approaches,

tend to recognize the more consistent utilization of the system by higher load-factor customers and can result in a more balanced allocation of costs.

Q. PLEASE DEFINE WHAT IS MEANT BY A "LOAD FACTOR."

A. A load factor is defined as the ratio of the average gas usage over a given period to the maximum or peak demand experienced during that same period. It is typically expressed as a percentage. For natural gas, load factor can be calculated by dividing the total gas usage over a period (e.g., annual throughput) by the product of the peak day demand and the number of days in the period.

$$Annual\ Load\ Factor = \frac{Annual\ Throughput}{(Peak\ Day\ Demand * 365\ Days)}$$

A system or customer class with a high load factor is one that uses gas more consistently over time, with relatively smaller differences between average and peak usage. These customers tend to utilize the system more steadily. Conversely, a low load factor indicates that usage is more concentrated during peak periods—such as during cold weather—requiring the system to maintain sufficient capacity to meet those peaks, even if that capacity is not utilized for much of the year.

Q. IS IT PREFERABLE TO PROMOTE THE DEVELOPMENT OF HIGHER LOAD FACTORS?

A. Yes, generally speaking, a higher load factor can be indicative of more efficient utilization of the natural gas distribution system, all else equal. Customers with higher load factors tend to use the system more consistently over time, which can reduce the need for excess capacity that is only required during peak periods—particularly during the winter heating season when demand is highest. However, it is important to recognize that natural gas utilities inherently serve customers with different usage characteristics and load profiles. Residential and small commercial

customers, for example, tend to have more weather-sensitive usage patterns, while larger commercial and industrial customers often have more stable, process-driven loads. Additionally, gas utilities operate within a broader system that includes upstream supply, storage, and transportation arrangements, which can help manage variability in demand and mitigate some of the impacts of differing load characteristics across customer classes. While rate design should recognize and encourage efficient system utilization where appropriate, caution should be exercised in placing too much emphasis on promoting higher load factors. Overemphasizing this objective can result in shifting costs away from higher load-factor customers and onto lower load-factor customers, such as residential and small commercial classes, in a manner that may not fully reflect cost causation. Accordingly, while load factor is a relevant consideration, it should not be the primary driver of cost allocation or rate design decisions.

Q. WHAT IMPACT DOES COST ALLOCATION HAVE ON REVENUE RECOVERY?

A. Cost allocation can have a significant impact on revenue recovery because it directly affects the rates charged to different customer classes, and those rates, in turn, influence customer behavior. Higher-use customers, such as large commercial and industrial customers, are generally more price sensitive than residential and small commercial customers. This is due to the relative impact that rate increases can have on their overall operating costs and the margins of the goods or services they produce. In the natural gas context, these customers often have alternatives available, including fuel switching to other energy sources, modifying production processes, or in some cases reducing or relocating operations. As a result, they tend to be more responsive to changes in rates. By comparison, residential and small commercial customers typically have fewer practical alternatives and are therefore less able to adjust their usage in response to price changes,

particularly for essential uses such as space heating during the winter. Because of these differences in price elasticity, the way costs are allocated among customer classes can influence the stability and predictability of revenue recovery. Allocating a disproportionate share of costs to more price-sensitive customers may increase the risk of reduced usage or load migration, which can, in turn, impact the Company's ability to recover its authorized revenue requirement. Accordingly, while cost allocation should remain grounded in cost causation principles, it is also important to recognize how allocation decisions can affect customer behavior and, ultimately, revenue recovery.

Q. WHAT IS A POTENTIAL MANNER IN WHICH AN ACOSS CAN BE BIASED AGAINST LOWER LOAD-FACTOR CUSTOMERS?

A. Natural gas utilities, like electric utilities, are capital-intensive and require significant investment in infrastructure—such as distribution mains, services, and related facilities—to deliver service to customers. As a result, how those plant-related costs are allocated plays a critical role in determining the cost of service for each customer class. One potential source of bias arises when cost allocation methodologies over-emphasize certain cost drivers in a way that shifts costs away from higher load-factor, more price-sensitive customers and onto lower load-factor customers, such as residential and small commercial classes. For example, placing excessive weight on peak demand measures—particularly those that do not fully reflect system diversity—can result in allocating a disproportionate share of costs to customer classes that contribute heavily to winter peak demand. Additionally, over-reliance on minimum system or customer-related classifications for distribution plant can attribute a large share of infrastructure costs to the mere existence of customers, rather than to the demand they place on the system. This can result in cost shifts that disproportionately impact lower load-factor customers. In each of these cases, the

underlying issue is whether the selected methodology appropriately reflects cost causation. When it does not, the resulting cost allocation can create inequities among customer classes and bias outcomes against certain groups of customers.

B. Overview of the Company's ACOSS

Q. PLEASE DESCRIBE THE COMPANY'S ACOSS.

A. The Company's ACOSS follows a three step process where costs are first functionalized into specific categories based on the various characteristics of utility operations, specifically the utility functions of gas supply, transmission, distribution, and customer.[71] Second, these functionalized plant and expenses are classified into three primary factors driving associated costs, including customer-related costs, demand-related costs, and commodity-related costs.[72] Finally, these classified plant investment and expenses are directly assigned to individual customers or class of customers where possible, and where not possible are allocated based on allocation factors designed to reflect cost causation through principles of both economics and engineering.[73]

Q. HOW DOES THE COMPANY ALLOCATE MAJOR PLANT INVESTMENTS, SUCH AS DISTRIBUTION MAINS?

A. The Company argues that distribution mains are installed both to meet peak demand requirements and to connect customers to the system.[74] Consistent with this belief, the Company classifies and allocates distribution mains as both customer-related and demand-related,[75] determining the customer-related portion of distribution mains through the use of a zero-intercept

[71] Direct Testimony of John D. Taylor, Company St. 19 at 5:19-22.

[72] Direct Testimony of John D. Taylor, Company St. 19 at 6:6-12.

[73] Direct Testimony of John D. Taylor, Company St. 19 at 7:11-18.

[74] Direct Testimony of John D. Taylor, Company St. 19 at 13:9-23.

[75] Direct Testimony of John D. Taylor, Company St. 19 at 12:9-13; 13:15-19.

study.[76] Specifically, 61 percent of distribution mains investment is treated as customer-related and allocated based on the number of customers, while 39 percent is treated as demand-related and allocated based on each class's contribution to peak day demand.[77]

Q. HAVE YOU PREPARED A SUMMARY OF THE RESULTS OF THE COMPANY'S ACOSS?

A. Yes. A summary of the Company's ACOSS results is presented in Exhibit MWD-3. The Company finds that it will earn a system average rate of return under current rates during the FPFTY of approximately 6.30 percent. The Company also finds that class-based rates of return vary significantly across customer classes, ranging from 2.12 percent for the Natural Gas Vehicle ("NGV") class to 34.99 percent for the Large Volume Industrial Service ("LVIS") class. The Company specifically finds that its residential service class will earn a 3.17 percent return on rate base during the FPFTY under current rates, or approximately 0.50 on a relative rate of return ("RROR") basis.

Q. DO YOU DISAGREE WITH ANY OF THE ASSUMPTIONS OR ALLOCATION FACTORS INCORPORATED IN THE COMPANY'S PROPOSED ACOSS?

A. Yes. Specifically, I disagree with the Company's classification and allocation of costs associated with distribution mains. Specifically, I disagree with the Company's employment of a zero-intercept study ("ZIS") to classify a portion of costs associated with distribution mains as customer-related. ZIS are premised on a flawed hypothetical relationship between investments in distribution mains and customer growth that empirically does not exist. Likewise, I disagree with

[76] Direct Testimony of John D. Taylor, Company St. 19 at 14:22 to 15:1.

[77] Direct Testimony of John D. Taylor, Company St. 19 at 12:7-12.

the Company's demand cost allocation method which fails to recognize that distribution mains supply both peak and non-peak service and thus perform both a demand and commodity function.

C. Allocation of Distribution Mains

Q. PLEASE DISCUSS HOW THE COMPANY CLASSIFIES AND ALLOCATES ITS DISTRIBUTION MAINS COSTS.

A. The Company classifies distribution mains costs as both customer-related and demand-related, reflecting its view that these facilities are installed both to connect customers to the system and to meet peak demand requirements. Specifically, the Company classifies approximately 61 percent of distribution mains investment as customer-related and 39 percent as demand-related,[78] based on the results of a ZIS.[79] The customer-related portion is allocated to customer classes based on the number of customers served, while the demand-related portion is allocated based on each class's contribution to peak day demand under system design conditions.[80]

Q. PLEASE EXPLAIN THE THEORETIC BASIS FOR A ZIS.

A. ZIS are advocated by those holding the view that investments in distribution mains are made to serve a dual nature: one consisting of meeting system peak demand requirements, and another focused on customer interconnection or access that requires a customer-based allocation component. This customer-based allocation component, also called a minimum system component, is determined through either a ZIS or a related minimum system study ("MSS").

[78] Direct Testimony of John D. Taylor, Company St. 19 at 12:7-10.

[79] Direct Testimony of John D. Taylor, Company St. 19 at 14:22 to 15:1.

[80] Direct Testimony of John D. Taylor, Company St. 19 at 12:9-13.

Q. WHAT ARE ZIS AND MSS STUDIES?

A. ZIS and MSS studies are cost allocation methodologies that attempt to estimate separate customer-related versus load-related costs. A MSS does this by estimating the hypothetical minimum costs of deploying distribution mains that only provide customers with connection to the Company's natural gas distribution system, but not a system sufficient to serve the customer's actual natural gas demand requirements. Likewise, a ZIS utilizes regression analysis techniques to estimate the relationship between the natural gas demand requirements on a system and costs associated with installation of new distribution mains. Using these regression analyses, a ZIS then calculates a hypothetical minimum cost by calculating the costs of the distribution mains assets given a zero-demand requirement, or likewise the costs associated with installing a hypothetical zero-diameter distribution main.

Q. ARE THERE ANY SHORTCOMINGS TO USING MSS AND ZIS BASED STUDIES FOR CLASSIFICATION OF DISTRIBUTION MAINS?

A. Yes. Both MSS and ZIS studies are flawed in that they deal in hypotheticals that often do not exist in the real world and furthermore attempt to model an empirical relationship that does not exist. Specifically, one should recognize that a zero-diameter distribution main is completely a hypothetical construct that does not, and indeed could not, exist in the real world. This makes the results of MSS and ZIS analyses difficult, if not impossible, to verify. Likewise, it should be recognized that the argument that distribution system costs are related to the number of customers on a utility's system is not a new argument, and the academic literature in utility regulation has questioned for quite some time the use of both MSS and ZIS studies.

Q. HOW HAS THE ACADEMIC LITERATURE IN UTILITY REGULATION QUESTIONED THE USE OF MSS AND ZIS STUDIES?

A. Dr. James Bonbright, in his seminal work on public utility rates published decades ago in the 1970s, raised a number of questions about the use of MSS and ZIS methodologies in classifying costs. Although Dr. Bonbright's criticisms were specifically focused on the application of MSS and ZIS methodologies in the context of classifying costs for an electric distribution utility, his criticisms are equally applicable to a natural gas distribution utility. Bonbright's primary concern was the lack of empirical support in the academic literature for a causal relationship between distribution system costs and the number of customers. The true driving factors of utility distribution system costs are much more complicated and depend on a host of other factors, such as the size of a service territory and the population density within it. The incremental costs of constructing an appropriate distribution system to serve an additional customer within an urban area with existing nearby infrastructure are substantially less than the costs to extend an existing utility system by potentially miles to serve an additional customer located in a rural area, a fact inherently ignored by MSS and ZIS methodologies.

> …the annual costs of this phantom, minimum-sized distribution system are treated as customer costs and are deducted from the annual costs of the existing system, only the balance being included among those demand-related costs to be mentioned in the following section. Their [minimum distribution costs] inclusion among the customer costs is defended on the ground that, since they vary directly with the area of the distribution system (or else with the lengths of the distribution lines, depending on the type of distribution system), they therefore vary directly with the number of customers. Alternatively, they are calculated by the "zero-intercept" method whereby regression equations are run relating cost to various sizes of equipment and eventually solving for the cost of a zero-sized system (Sterzinger, 1981).
>
> What this last-named cost imputation overlooks, of course, is the very weak correlation between the area (or the mileage) of a distribution system and the number of customers served by this

> system. For it makes no allowance for the density factor (customers per linear mile or per square mile). Our casual empiricism is supported by a more systematic regression analysis in (Lessels, 1980) where no statistical association was found between distribution costs and number of customers. Thus, if the company's entire service area stays fixed, an increase in number of customers does not necessarily betoken any increase whatever in the costs of a minimum-sized distribution system.[81]

Q. WHAT WAS DR. BONBRIGHT'S CONCLUSION REGARDING THE USE OF ZIS STUDIES?

A. Dr. Bonbright found attempts to classify costs associated with a minimum-sized distribution system, whether determined through the use of a ZIS or MSS, as something other than demand-related as potentially of merit. However, he ultimately concluded that classifying these costs as customer-related, as the Company has done in the current proceeding, is "clearly indefensible,"[82] due to the lack of a relationship between changes in the number of customers on a utility system and its distribution costs.

> While, for the reason just suggested, **the inclusion of the costs of a minimum-sized distribution system among the customer-related costs seems to us clearly indefensible**, its exclusion from the demand-related costs stands on much firmer ground. For this exclusion of minimum-sized distribution system costs makes more plausible the assumption that the *remaining* cost of the secondary distribution system is a cost which varies continuously (and, perhaps, even more or less directly) with the maximum demand imposed on this system as measured by peak load.
>
> But if the hypothetical cost of a minimum-sized distribution system is properly excluded from the demand-related costs for the reason just given, while it is also denied a place among the customer costs for the reason stated previously, to which cost function does it then belong? **The only defensible answer, in our opinion, is that it belongs to none of them**. Instead, it should be recognized as a

[81] James C. Bonbright, et al. Principles of Public Utility Rates. 1988 Edition. Arlington, VA: Public Utilities Reports, Inc., p. 491.

[82] James C. Bonbright, et al. Principles of Public Utility Rates. 1988 Edition. Arlington, VA: Public Utilities Reports, Inc., p. 492.

> strictly unallocable portion of total costs. And this is the disposition that it would probably receive in an estimate of long-run marginal costs. But fully-distributed cost analysts dare not avail themselves of this solution, since they are the prisoners of their own assumption that "the sum of the parts equals the whole." They are therefore under impelling pressure to fudge their cost apportionments **by using the category of customer costs as a dumping ground for costs that they cannot plausibly impute to any of their other cost categories**.[83]

Q. HAVE YOU QUANTITATIVELY ASSESSED THE HISTORIC CORRELATION BETWEEN INCREASES IN COMPANY DISTRIBUTION MAINS INVESTMENT AND INCREASED NUMBER OF CUSTOMERS?

A. Yes. Exhibit MWD-4 examines trends between changes in average number of customers on the Company's system and the Company's net investment in distribution mains for the years 2014 through 2024. This analysis finds that annual net additions in the Company's distribution mains are not correlated with annual changes in the Company's customer counts, nor is the annual growth rate of the Company's booked distribution mains investment correlated with the annual growth rate of the Company's customers. Indeed, I find that, if anything, there is a **negative** relationship between changes in the Company's customer counts and distribution mains investments as the Company made significant investments in its distribution mains system during years when it had slower than average growth.

Q. IS THIS RESULT SURPRISING?

A. No. A significant portion of the Company's annual investment in distribution mains is associated with non-growth activities. For instance, the Company recovered $1.95 million from ratepayers in 2025 through the Company's DSIC after reconciliation.[84] Importantly, the DSIC is

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[83] James C. Bonbright, *et al.* Principles of Public Utility Rates. 1988 Edition. Arlington, VA: Public Utilities Reports, Inc., pp. 491-492; *emphasis added.*

[84] DSIC 1307(e) reconciliation statement for the year ending December 31, 2025.

restricted by statue to costs "incurred to repair, improve or replace eligible property in order to ensure and maintain adequate, efficient, safe, reliable and reasonable service," and not growth related activities like interconnecting new customers to the Company's system. Overall, the premise that changes in the Company's customer count are a significant driver of distribution mains investment is outdated and unsupported by empirical evidence.

Q. DO YOU HAVE OTHER CONCERNS RELATED TO THE COMPANY'S COST ALLOCATION METHODOLOGY FOR COSTS ASSOCIATED WITH DISTRIBUTION MAINS?

A. Yes. In addition to relying on a flawed ZIS to estimate a portion of costs associated with the Company's distribution mains, the Company also proposes to allocate 100 percent of costs associated with its demand-related distribution mains investments based on the relative customer class contribution to system peak day demands. This is inconsistent with the allocation approach utilized in the Company's prior rate case that relied on a peak and average ("P&A") cost allocation methodology, also referred to as an average and peak, using "Seaboard" weightings to allocate costs related to distribution mains.

Q. PLEASE EXPLAIN THE P&A COST ALLOCATION METHODOLOGY.

A. P&A is a composite demand and commodity allocation factor similar to the Average and Excess ("A&E") cost allocation approach.[85] The P&A cost allocation methodology is based upon a two-component weighted average. The first component represents each rate class's share of a utility's system peak day demand, and the second represents each rate classes share of a utility's

[85] Gas Distribution Rate Design Manual (June 1989), National Association of Regulatory Utility Commissioners, pp. 27-28.

total annual throughput.[86] The exact weights used in a P&A cost allocation approach vary, including a straight 50-50 weighting of demand and commodity components, often referred to as the "Seaboard" method.

Q. PLEASE EXPLAIN THE SEABOARD COST ALLOCATION METHOD.

A. The *Atlantic Seaboard* method, (or "*Seaboard"* method), stems from a 1952 Federal Power Commission ("FPC," the predecessor agency to FERC) ruling establishing appropriate cost allocations for the Atlantic Seaboard natural gas pipeline.[87] In its ruling, the FPC explicitly addressed the fact that natural gas pipeline facilities are built to supply both peak and non-peak service, and thus perform both a demand and commodity function, and expressed particular concern that an over-assignment of pipeline costs (particularly transmission plant costs) to the demand or capacity function would result in an under-allocation of costs to large volume industrial customers on interruptible rates.[88]

> A natural-gas transmission facility performs both a capacity and a volumetric function. In this sense it is a joint facility, which thus presents the problem, always difficult, of allocating joint costs.
>
> … A pipeline would not normally be built to supply peak service, that is to say, service on the peak days only… pipelines are built to supply service not only on the few peak days but on all days throughout the year… Both capacity and annual use are important considerations in the conception of the project ... Both capacity and volume, therefore, are what are known as cost factors or incidences in respect to the capital outlay for a pipeline project. It follows that reasonably accurate results can be achieved only by allocating the

[86] Gas Distribution Rate Design Manual (June 1989), National Association of Regulatory Utility Commissioners, pp. 27-28.

[87] Re Atlantic Seaboard Corporation and Virginia Gas Transmission Corporation, Federal Power Commission Docket No. 11. F.P.C. 43.

[88] *Id.*

> fixed expenses flowing from the capital outlay to both operating functions, viz., capacity and volume.[89]

Q. HAS THE COMPANY ESTIMATED THE RESULTS OF AN ALTERNATIVE ACOSS USING A P&A ALLOCATION WITH SEABOARD WEIGHTINGS?

A. Yes, and I have summarized these results in Exhibit MWD-5. Exhibit MWD-5 shows that an alternative ACOSS using P&A allocation of distribution mains with Seaboard weightings results in significantly different results when compared to the Company's proposed ACOSS. In particular, under this alternative, the residential service class will earn a 6.86 percent return on rate base during the FPFTY under current rates, or approximately 1.09 on a ROR basis. This is compared to the results of the Company's proposed ACOSS which finds that its residential service class will earn a 3.17 percent return on rate base during the FPFTY under current rates.

Q. IS THE COMPANY WITNESS' PROPOSED ALLOCATION OF DISTRIBUTION MAINS CONSISTENT WITH HIS RECOMMENDED COST ALLOCATIONS IN OTHER PROCEEDINGS IN PENNSYLVANIA?

A. No. The Commission should recognize that the Company's expert witness is also supporting the ACOSS for UGI Utilities' Gas Division ("UGI-Gas") in Docket No. R-2025-3059523.[90] In that proceeding, the Company's expert witness recommends use of an A&E cost allocation methodology to allocate costs associated with UGI-Gas' distribution gas mains.

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[89] Conkling R.L. (2011), "Energy Pricing: Economics and Principles," pp. 96-97, citing Re Atlantic Seaboard Corporation and Virginia Gas Transmission Corporation, Federal Power Commission Docket No. 11. F.P.C. 43.

[90] Docket No. R-2025-3059523, Statement No. 11, Direct Testimony of John D. Taylor.

Q. PLEASE DESCRIBE THE A&E COST ALLOCATION METHODOLOGY.

A. Conceptually, A&E cost allocation methods involve developing two components that are combined by the use of a weighted average.[91] The first component, referred to as the "average" component, represents each rate class's average hourly energy consumption throughout the test year, and is calculated by simply dividing annual energy consumption for each rate class by 365 days in the year. The second component, referred to as the "excess" component, represents each class's contribution to system peak demand in excess of the class's average daily consumption. These components are combined through the use of a weighted average based on overall system load factor. Specifically, the average component is weighted by the utility's overall system load factor, while the excess component is weighted by the inverse of the system load factor (*i.e.*, 1 minus the system load factor).

Q. IS A P&A METHODOLOGY CONCEPTUALLY SIMILAR TO AN A&E METHODOLOGY?

A. Yes. The P&A methodology is similar to the A&E methodology that can also be utilized for classifying distribution mains. Conceptually, both methods involve developing a volumetric and demand component that are then combined by use of a weighted average. In other words, both methodologies are intended to be hybrid energy and demand allocators.

Q. PLEASE EXPLAIN THE DIFFERENCE BETWEEN A P&A METHODOLOGY AND AN A&E METHODOLOGY.

A. Although the P&A and A&E methodologies are conceptually similar, in practice, an A&E methodology places greater weight on a rate class's demand contribution and less weight on a rate

[91] *See*, Electric Utility Cost Allocation Manual (January 1992), National Association of Regulatory Utility Commissioners ("NARUC") at 49-51.

class's annual energy usage than does a P&A methodology. This occurs because an A&E methodology values a class's peak demand, the "excess" component, relative to its average demand, thereby exaggerating the effect of a class's load factor on the relative classification of energy and peak demand elements.

D. ACOSS Recommendations

Q. WHAT ARE YOUR RECOMMENDATIONS REGARDING THE CLASSIFICATION OF DISTRIBUTION MAINS INVESTMENT AND THE USE OF ZIS?

A. I recommend the Commission reject the Company's proposed ZIS approach. ZIS and related MSS that are used to classify distribution mains investments are fundamentally flawed and provide little to no value in setting just and reasonable rates. In the alternative, I recommend that the Commission approve an alternative classification of distribution mains that incorporates a P&A cost allocation method using weights based on the Company's test year system load factor. These recommendations better reflect cost causation principles and provide a more reasonable basis for allocating costs among customer classes.

Q. HOW DOES YOUR PROPOSED COST ALLOCATION METHODOLOGY COMPARE TO THE EARLIER SEABOARD METHODOLOGY?

A. Conceptually, my proposed P&A cost allocation method is similar to the earlier discussed Seaboard method relied on to allocate costs associated with distribution mains. However, where the Seaboard method uses a 50-50 weighting of the demand and volumetric components, my proposal would base these weights on the Company's system load factor, or the ratio of peak day system requirements to average daily system requirements. This bases the weights of the two components in a P&A cost allocation method on empirical data specific to the Company's Pennsylvania operations. The Company's test year system load factor is 26.13 percent.

Q. HAVE YOU PREPARED AN ALTERNATIVE ACOSS INCORPORATING YOUR PROPOSED CHANGES TO THE COMPANY'S ACOSS?

A. Yes. Exhibit MWD-6 presents the results of my alternative ACOSS which utilizes a P&A approach to allocate distribution-related costs and removes the Company's reliance on the ZIS to classify distribution mains as customer-related. This alternative study shows that the Company will earn a 6.43 percent rate of return on rate base from the residential service class, or 1.02 on a RROR basis, during the FPFTY using current rates. This is compared to the results of the Company's proposed ACOSS which finds that its residential service class will earn a 3.17 percent return on rate base during the FPFTY under current rates.

VIII. REVENUE APPORTIONMENT

Q. PLEASE EXPLAIN THE PURPOSE OF THE REVENUE APPORTIONMENT PROCESS IN SETTING RATES.

A. The revenue distribution process allocates a utility's overall revenue deficiency across customer classes, which in turn, is used to establish a new set of retail rates. The revenue distribution process often uses the results from the ACOSS as its starting point, but not necessarily as its ending point. Class-specific revenue responsibilities are established by allocating the system-wide revenue deficiency to classes that are under-earning, relative to their estimated rate of return ("ROR"), and assigning, at least in theory, revenue decreases to those classes that are over-earning relative to their ACOSS-estimated class returns. The final class revenue responsibilities are then used, in conjunction with each class's billing determinants, to determine rates. In summary, the revenue distribution process can be viewed as the initial step taken in establishing rates.

Q. DOES THE REVENUE APPORTIONMENT PROCESS INCLUDE ANY POLICY CONSIDERATIONS?

A. Yes. Allocating the overall system-wide revenue deficiency entirely on a full cost of service basis can result in a very significant and adverse rate impact for certain under-earning classes. To avoid such a result, regulators often temper the revenue responsibilities assigned to various customer classes in order to meet a set of broad ratemaking policy goals.

Q. WHAT ARE THOSE BROADER RATEMAKING POLICY GOALS?

A. There are several generally accepted ratemaking principles used in utility regulation that include:

1) Rates should be fair, just, and reasonable, and not unduly discriminatory.
2) To the extent possible, gradualism should be used to protect customers from rate shock.
3) Rate continuity should be maintained.
4) Rates should be informed by costs, but class cost of service results need not be the only factor used in rate development.
5) Rates should be understandable to customers.

Q. HOW ARE THE ABOVE PRINCIPLES APPLIED IN DEVELOPING RATES FOR A REGULATED UTILITY?

A. It is important to consider all the principles I mentioned above. However, any principle's relative weight can change depending on the importance of certain policy goals. Rate design should strike a balance between policy goals and principles that result in rates that are fair, just, and reasonable. There is no pre-set or universally accepted formula for developing rates and, as a result, sound judgment is necessary to formulate a rate design that meets these objectives.

Q. WHAT ARE THE COMPANY'S RATE DESIGN GOALS?

A. The Company states that it attempts to balance various criteria that relate to the design of utility rates.[92] The Company identifies three factors guiding its rate design proposal in this proceeding: (1) cost of service, (2) class contributions to present revenues, and (3) customer impacts.[93]

Q. HAVE YOU EXAMINED THE COMPANY'S PROPOSED REVENUE ALLOCATION?

A. Yes. Exhibit MWD-7 summarizes the Company's proposed revenue allocation. The Company proposes three rate increases based on the results of its ACOSS to define a mitigated revenue allocation. First, the Company proposes to limit the maximum increase for any customer class below a cost-parity ratio of 1.0 to 110 percent (or 1.10 times) of the proposed system average increase.[94] Second, the Company proposes that classes with a cost parity ratio greater than 1.0 but less than 1.5 at current rates, will receive an increase equal to 90 percent (or 0.90 times) of the system average increase.[95] Finally, classes with cost parity ratios greater than 1.5 at current rates will receive an increase equal to 67 percent (or 0.67 times) of the system-wide average increase to recover the remaining requested increase.[96]

Q. WHAT DO YOU MEAN BY A COST PARITY RATIO?

A. Cost parity and relative cost parity ratios are a means to standardize class-specific rate of return estimated by an ACOSS, similar to the commonly cited relative rate of return ("RROR")

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[92] Direct Testimony of John D. Taylor, Company St. 19 at 20:13 to 21:1.

[93] Direct Testimony of John D. Taylor, Company St. 19 at 21:2-3.

[94] Direct Testimony of John D. Taylor, Company St. 19 at 21:8-10.

[95] Direct Testimony of John D. Taylor, Company St. 19 at 21:11-13.

[96] Direct Testimony of John D. Taylor, Company St. 19 at 21:14-16.

metric. As part of the ACOSS process, a ratio of total assigned revenue to total assigned costs is calculated for each customer class and the utility system as a whole. A cost parity ratio standardizes these various class revenue-to-cost ratios against the overall utility system revenue-to-cost ratio. For instance, assume that residential class revenues cover 80 percent of residential class costs through the ACOSS, and further assume that, system-wide, utility revenues also cover 80 percent of utility costs. In this example, the residential class has a relative cost parity ratio of 1.0 as it covers the same percentage of utility costs as the utility as a whole covers (i.e., 80 percent divided by 80 percent equals 1.0). A relative cost parity ratio greater than 1.0 indicates that a particular class covers a greater percentage of utility costs than other classes, while a relative cost parity ratio less than 1.0 indicates that a particular class is covering a lesser percentage of utility costs than other classes.

Q. DO YOU AGREE THAT A RELATIVE COST PARITY RATIO LESS THAN 1.0 IS PROBLEMATIC OR INEQUITABLE?

A. Not necessarily. Consistent with the principles identified above, there may be policy reasons to support a result that does not lead to an inequitable cross-subsidization. For example, the presence and/or continuation of a relative cost parity ratio below 1.0 could be the result of a prior agreed-upon rate freeze that prevents class rates from increasing to correct the revenue deficiency (relative to cost of service). In this example, the presence of a relative cost parity ratio below 1.0 is simply a function of a prior policy decision, not necessarily the result of some arbitrary or intentionally designed inequity.

Q. HAVE OTHER COMMISSIONS RECOGNIZED LIMITATIONS ON RELATIVE COST PARITY RATIOS?

A. Yes. It should be recognized that ACOSS estimates are snapshots in time that may not fully reflect the relative cost of providing service after the conclusion of the rate case proceeding. To this end, the Washington Utilities and Transportation Commission ("WUTC") historically has applied an error range of +/- 0.05 to cost parity ratio estimates,[97] meaning that ACOSS results within the range of 0.95 to 1.05 are considered to be at full cost parity (i.e., 1.0 relative cost parity ratio).

Q. WHAT ARE THE CLASS RATE INCREASES UNDER THE COMPANY'S PROPOSED REVENUE DISTRIBUTION?

A. The Company proposes to increase base rates by 14.38 percent on a system-wide average basis. However, under the Company's proposed mitigated revenue distribution, residential and natural gas vehicle customers would all receive a base rate increase equal to 1.10 times this system-wide average rate increase, or 15.82 percent. This compared to large commercial and public authority service and all four industrial service rates which would receive a base rate increase equal to 0.67 times the system-wide average increase, or 9.65 percent.

Q. DO YOU AGREE WITH THE COMPANY'S PROPOSED REVENUE APPORTIONMENT?

A. No. The Company's proposed revenue allocations suffer from two major deficiencies. First, the Company's proposal is based on the results of a faulty ACOSS that overstates the current rate of return the Company derives from its large commercial and industrial service customers

[97] *Washington Utilities and Transportation Commission v. Pacific Power & Light Company;* Washington Utilities and Transportation Commission Docket UE-152253, Order 12 at ¶225, F.N. 350.

while understating the rate of return the Company derives from its residential service customers. Second, the Company's proposed revenue apportionment process results in rate increases that are inconsistent with rate gradualism. Specifically, rate gradualism refers to the general understanding that sound rate design should prevent significant rate increases for any customer group that may cause rate shock.[98]

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE COMPANY'S PROPOSED REVENUE APPORTIONMENT?

A. I recommend the Commission adopt a more reasonable revenue apportionment method based on my alternative ACOSS results that also limits the rate increase compared to the Company's proposed revenue allocation method. First, I recommend that classes with current relative cost parity ratios below 0.95 receive a rate increase equal to 1.15 times the system average increase. Second, I recommend that classes with current relative cost parity ratios greater than 1.05 receive a rate increase equal to 0.85 times the system average increase. Finally, I recommend that the remaining rate increase be equally allocated to the remaining rate classes with current relative cost parity ratios of between 0.95 and 1.05.

Q. HAVE YOU PREPARED A SUMMARY OF THE EFFECTS OF YOUR PROPOSED REVENUE APPORTIONMENT?

A. Yes. Exhibit MWD-8 presents an illustrative summary of the effects of my proposed revenue apportionment under the Company's proposed system average rate increase of 14.38 percent. My proposed revenue apportionment would increase base rates for the residential class by 14.34 percent, compared to the Company's proposal which would increase such rates by 15.82

[98] *See,* "3.1 Just and Reasonable Rates and Affordability," The NARUC Desk Reference Manual, National Association of Regulatory Utility Commissioners,

percent, and would also increase base rates for the large commercial and public authority service class by 14.34 percent, compared to the Company's proposed increase of 9.65 percent.

IX. RATE DESIGN

Q. HOW ARE NATURAL GAS RATES TYPICALLY DESIGNED?

A. Natural gas utility rates are typically comprised of three elements. The first component is the fixed monthly customer charge or what is sometimes referred to as the basic service charge. The second is the energy-based component that is a volumetric rate applied toward a customer's monthly energy usage during a billing period, often measured in terms of therms or dekatherms (Dth). Finally, demand rates are surcharges that are assessed based upon a customer's maximum usage during a billing period. Some smaller use customer classes, such as residential and small general services classes, are not demand-metered and thus, only face customer and volumetric charges in what is commonly called a "two-part tariff." Larger, demand metered, customers face a "three-part tariff" which includes a customer, volumetric, and demand charge. A "multi-part tariff" is a term often used to generalize a set of rates that have various combinations of both fixed (customer charge) and variable charges (energy and/or demand charges).

Q. HOW SHOULD POLICY BALANCE COST ASSIGNMENTS BETWEEN FIXED CUSTOMER CHARGES AND VOLUMETRIC RATES?

A. Modern utility pricing theory is primarily concerned with the development of optimal tariff design, which over the years has become dominated by the two-part and three-part tariff form that is sometimes referred to more technically as a non-linear (or non-uniform) pricing approach. Once a class revenue requirement is established, the goal for regulators should be one that sets the most appropriate rates based upon various efficiency and equity considerations. Balancing the weight

of how costs are recovered between fixed rates, variable rates, block rates, and seasonal rates are all integrated parts of that process.

Q. WHAT IS THE APPROPRIATE ROLE OF COSTS IN SETTING RATES FOR A MULTI-PART TARIFF?

A. Costs can be instructive in establishing a baseline upon which prices may be set, but costs do not need to serve as the sole or exclusive basis for rates in order for them to be set optimally (i.e., fixed charges do not need to strictly equal fixed costs, variable rates need not strictly equal variable costs). Unfortunately, the "fixed charge-equals-fixed costs" philosophy gets repeated so often that it can drown out meaningful discussions about other equally important considerations in setting rates in imperfect markets. In fact, appropriate rate setting in the context of a multi-part tariff typically has more to do with consumer demand than it does with cost in a natural gas context given the capital-intensive nature of public utilities.

Q. DOES THE RATE DESIGN PROCESS HAVE ANY GOALS?

A. Yes. The development of utility rates, or "rate design" often has a few goals. For example, rates are sometimes designed to send certain price signals to consumers in order to influence their usage decisions.[99] Sometimes, rate design becomes a balancing act since rates must be designed to be both supply-eliciting (i.e., assist utilities in the financing of capital investments) and demand-inhibiting (i.e., inhibit the growth in demand that generates the need for capital investments).[100]

[99] Bonbright, James *et. al., Principles of Public Utility Rates,* Pub. Utils. R., Inc., Second Edition, at 96–97.

[100] *Id.*

Table 4: Summary of Company's Proposed Customer Charges

Rate Class	Current ---- $/month ----	Proposed	Increase
Residential	$ 14.00	$ 19.00	35.7%
Small Commercial (<250 Sales)	$ 27.00	$ 30.00	11.1%
Small Commercial (>250 Sales)	$ 37.00	$ 50.00	35.1%
Large Commercial Sales	$ 151.00	$ 151.00	0.0%

Source: Exhibit CTM-8

Q. PLEASE PROVIDE AN OVERVIEW OF THE COMPANY'S BASIC SERVICE CHARGE PROPOSAL.

A. The Company proposes to increase monthly basic service charges by up to 36 percent. This includes a residential service schedule with a basic service charge increase of 36 percent. This results in a proposed increase in basic charge of $5.00 per month, from the current $14.00 to a proposed $19.00 per month.[101]

Q. WHAT IS THE BASIS OF THE COMPANY'S PROPOSED RESIDENTIAL BASIC SERVICE CHARGE INCREASE?

A. The Company claims its proposed increase in residential basic service charge will help to continue to accelerate its infrastructure replacement and modernization investments to enhance safety and reliability and reduce emissions, as well as helping lower the burden of cost increases and inflationary pressures that the U.S. economy is currently facing.[102]

Q. HAVE YOU PREPARED AN ANALYSIS OF COSTS COMMONLY ASSOCIATED WITH BASIC SERVICE CHARGES?

A. Yes. Exhibit MWD-9 presents an analysis of current basic service charges with the Company's customer-related expenses. "Customer-related" expense accounts for natural gas

[101] National Fuel Exhibit CTM-8 at 1-2

[102] Direct Testimony of Rebecca E. Hillery, Company 1 at 6:19-23 and 7:1-5.

utilities are those typically allocated on the basis of customers and can include: removing and setting meters; maintenance of meters; meter reading expenses; customer records and collections; customer billing and accounts; and customer service and information expenses. These costs can also include the depreciation expense associated with service and meter plant accounts, as well as the carrying charges (at the Company's requested rate of return) on these plant accounts.

Q. HOW DO THE COMPANY'S CUSTOMER CHARGE REVENUES COMPARE WITH THE RESULTS OF YOUR ANALYSIS?

A. The Company's current customer charge revenue associated with the residential class is 61.7 percent of the class's customer-related cost responsibilities. Likewise, the Company's current customer charge revenue associated with the small commercial service class (250 Mcf or less) is 122.3 percent of the class's customer-related cost responsibilities.

Q. DO THESE RESULTS INDICATE ANY PRESSING NEED TO INCREASE MONTHLY CUSTOMER CHARGE RATES?

A. No. All NFG's residential and commercial service rate classes currently cover the majority of their customer-related costs through monthly customer charges. The lowest, the residential class, still recovers nearly 62 percent of its customer-related costs through its monthly customer charge.

Table 5: Survey of Regional Customer Charges

Company	State	Residential Customer Charge ($/month)	Commercial Customer Charge ($/month)
National Fuel Gas Distribution (Current)	**PA**	**$ 14.00**	**$ 27.00**
National Fuel Gas Distribution (Proposed)	**PA**	**$ 19.00**	**$ 30.00**
Delmarva Power and Light Company	DE	17.00	69.20
Washington Gas Light Company	DC	19.05	34.40
Baltimore Gas and Electric Company	MD	16.15	39.05
Washington Gas Light Company	MD	11.85	21.50
Elizabethtown Gas Company	NJ	11.50	41.05
New Jersey Natural Gas Company	NJ	12.00	55.00
Public Service Electric and Gas Company	NJ	9.38	27.62
South Jersey Gas Company	NJ	10.50	40.50
KeySpan Gas East Corporation	NY	27.50	50.00
National Fuel Gas Distribution Corporation	NY	21.00	22.50
Niagara Mohawk Power Corporation	NY	23.75	28.60
Orange and Rockland Utilities, Inc.	NY	22.50	35.00
The Brooklyn Union Gas Company	NY	24.50	50.00
Columbia Gas of Pennsylvania, Inc.	PA	20.15	36.55
Peco Energy Company	PA	15.70	36.38
Peoples Natural Gas Company	PA	16.80	22.00
UGI Utilities, Inc.	PA	16.25	36.42
Peer Group Average		**$ 17.39**	**$ 37.99**

Source: Utility Tariffs.

Q. HAVE YOU COMPARED THE COMPANY'S CURRENT AND PROPOSED RESIDENTIAL CUSTOMER CHARGE WITH OTHER REGIONAL PEER UTILITIES?

A. Yes. The Company's proposed residential customer charge of $19.00 would be well above the mid-Atlantic regional average of $17.39 per month charged by other investor-owned natural gas utilities. Indeed, the Company's proposed residential customer charge of $19.00 per month would also exceed the average residential customer charge for Pennsylvania investor-owned natural gas utilities of $17.23 per month.

Q. ARE HIGHER BASIC SERVICE CHARGES CONSISTENT WITH THE PROMOTION OF ENERGY EFFICIENCY AND CONSERVATION?

A. No. The Company's proposal is inconsistent with the promotion of energy efficiency and conservation in Pennsylvania for the simple reason that it places more costs into the fixed component of rates than in the variable component. This reduces economic incentives for ratepayers to control monthly utility bills through energy efficiency and conservation efforts, because only the variable component of bills is avoidable.

Q. HAVE OTHER COMMISSIONS RECOGNIZED THE DETRIMENTAL EFFECT INCREASED FIXED CHARGES HAVE ON ENERGY EFFICIENCY?

A. Yes. In rejecting a request by Baltimore Gas and Electric to increase customer charges as part of a larger rate design proposal, the Maryland Public Service Commission (MPSC) recognized the need to allow customers the opportunity to control their monthly bills by reducing energy usage.

> Even though this issue was virtually uncontested by the parties, we find we must reject Staff's proposal to increase the fixed customer charge from $7.50 to $8.36. Based on the reasoning that ratepayers should be offered the opportunity to control their monthly bills to some degree by controlling their energy usage, we instead adopt the Company's proposal to achieve the entire revenue requirement increase through volumetric and demand charges. This approach also is consistent with and supports our EmPOWER Maryland goals.[103]

Q. CAN YOU POINT TO ANY OTHER REGULATORY EXAMPLES?

A. Yes. The Montana Public Service Commission ("MT PSC") addressed this issue in evaluating, and rejecting, a proposal by Energy West Montana to eliminate volumetric charges and

[103] Maryland Public Service Commission Case No. 9299*, In re of Baltimore Gas and Electric Company for Adjustment in its Electric and Gas Base Rates*, Order No. 85374 at 99 (Md. Pub. Serv. Comm'n, Feb. 22, 2013).

only have one fixed monthly customer charge (known as a "straight-fixed variable" or "SFV" rate design):

> The Commission agrees that most distribution costs are not avoidable, and that volumetric distribution charges may encourage conservation actions that, all other things being equal, reduce the utility's embedded cost recovery between rate cases and contribute to future rate increases.
> …
> The Commission agrees that an SFV rate design is a clean and administratively inexpensive way to decouple revenue from volume. An often-cited public policy justification for revenue decoupling is to remove the volume disincentive for cost-effective conservation investment by a gas distribution company, which through SFV and other decoupling methods is rendered indifferent to the volume of gas consumed. Yet, SFV rates decouple revenue at the cost of decreasing returns to conservation investment by customers. For this reason the net conservation benefit of revenue decoupling via SFV rates is not clear, and may be negative.[104]

Q. HAVE ANY REGULATORY RESEARCH INSTITUTES ADDRESSED THE ISSUE OF THE RELATIONSHIP BETWEEN HIGH CUSTOMER CHARGES AND ENERGY EFFICIENCY?

A. Yes. A research document presented for consideration by the membership of NARUC lists Straight-Fixed Variable (SFV) rate design as an alternative to delink utility revenue from sales. An SFV attaches all fixed-related costs to fixed charges while relegating only variable charges to volumetric rates. The NARUC research noted this type of rate design was problematic because of its effects on customer incentives to conserve energy:

> **Straight-Fixed Variable Rate Design.** This mechanism eliminates all variable distribution charges and costs are recovered through a fixed delivery services charge or an increase in the fixed customer charge alone. With this approach, it is assumed that a utility's

[104] In The Matter Of Energy West Montana, Application To Establish Increased Service Rates In Its Great Falls, Cascade, And West Yellowstone Service Areas, Montana Public Service Commission, Docket No. D2010.9.90, Order No, 7132c, at 29–30, rel. November 17, 2011.

> revenues would be unaffected by changes in sales levels if all its overhead or fixed costs are recovered in the fixed portion of customers' bills. This approach has been criticized for having the unintended effect of reducing customers' incentive to use less electricity or gas by eliminating their volumetric charges and billing a fixed monthly rate, regardless of how much customers consume.[105]

Q. HAS ANY NATIONAL PUBLIC POLICY ANALYSIS NOTED THE EFFICIENCY DISINCENTIVES ASSOCIATED WITH HIGHER CUSTOMER CHARGES?

A. Yes. The National Action Plan for Energy Efficiency (NAPEE), a joint venture of the U.S. Department of Energy and U.S. Environmental Protection Agency, published a whitepaper on various rate design effects on encouraging energy efficient behaviors. The NAPEE postulated that SFV had a detrimental effect on economic signals to encourage customers to change energy usage behavior and investments in energy efficiency devices, and specifically noted that such disincentives persist even when applied to individual components of a customer's utility bill, such as SFV for strictly distribution services:

> Because [SFV] tends to shift costs out of volumetric charges, it tends to reduce customers' efficiency incentive, because the marginal price of additional consumption is reduced. While SFV rates are being considered to better reflect the utility's costs behind the rate, these rates do not encourage customers to change energy usage behavior or invest in efficiency technologies. Such customer disincentives persist even when SFV rates are applied to individual components of the bill, such as charges for distribution service.[106]

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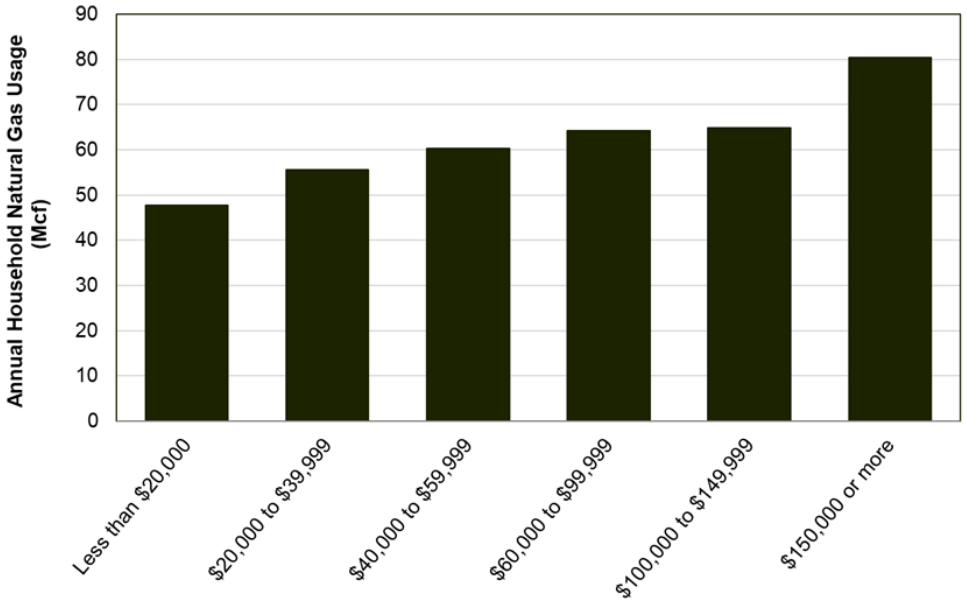
[105] NACUA, *Decoupling for Electric & Gas Utilities: Frequently Asked Questions (FAQ)* (Sept. 2007), Grants & Research Department, Nat'l Assoc of Reg Util Comm'rs, at 5. (Emphasis added), available at https://www.maine.gov/mpuc/legislative/archive/2006legislation/DecouplingRpt-AttachC.pdf.

[106] National Action Plan for Energy Efficiency, *Customer Incentives for Energy Efficiency Through Electric and Natural Gas Rate Design* at 13–14, prepared by William Prindle, ICF International, Inc. (Sept.2009) (emphasis added), available at https://www.epa.gov/sites/production/files/2015-08/documents/rate_design.pdf.

Q. SHOULD THE COMMISSION BE MINDFUL OF THE EFFECT OF THE COMPANY'S PROPOSED RATE DESIGN ON LOW-USE RESIDENTIAL CUSTOMERS?

A. Yes. There are numerous studies in the academic literature supporting the hypothesis that natural gas is a "normal good."[107] That is, the consumption of natural gas is directly correlated with household income level, meaning that higher-use natural gas customers are typically higher income individuals and lower-use natural gas customers are typically lower income individuals. These are important factual considerations the Commission should bear in mind.

Figure 5: Analysis of Natural Gas Usage and Household Income



Source: EIA 2020 Residential Energy Consumption Survey

[107] *See*, Alberini, A., W. Gans, D. Velez-Lopez. 2011, "Residential consumption of gas and electricity in the U.S.: The role of prices and income," Energy Economics 33, 870-881; Dax, P. 1987, "Estimation of Income Elasticity from Cross-Section Data," Applied Economics 19 (11), 1471-1482; and Swan L.G., V. I. Ugursan, 2009, "Modeling of end-use energy consumption in the residential sector: A review of modeling techniques," Renewable and Sustainable Energy Reviews 13, 1819-1835.

Q. HAVE YOU CONDUCTED ANY ANALYSES EXAMINING THE RELATIONSHIP OF NATURAL GAS USAGE AND INCOME?

A. Yes. Figure 5 provides the results of an analysis I performed using data from the 2020 Residential Energy Consumption Survey ("RECS") produced by the United States Energy Information Administration ("EIA") and household data from the Census division in which Pennsylvania is located.[108] The results show a positive relationship between natural gas consumption (in Mcf terms) and income. This clearly shows that as income increases, natural gas consumption increases, and vice versa: as income decreases, natural gas usage decreases.

Q. WHAT ARE YOUR CUSTOMER CHARGE RECOMMENDATIONS AND CONCLUSIONS?

A. I recommend that the Commission reject the Company's proposed increase in residential and commercial customer charges. An analysis of customer-related costs finds that residential rate classes are currently recovering a majority of customer-related costs through monthly customer charges. The proposal would also negatively impact the public policy goals of energy efficiency and would burden low-use customers with a greater than average portion of any proposed increase in the case. The Commission should keep the Company's current customer charges for all customers.

[108] This census division also includes the states of Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. This is the most detailed level of aggregation available in the RECS.

Q. DO YOU HAVE AN ALTERNATIVE RECOMMENDATION IF THE COMMISSION DECIDES AN INCREASE IN MONTHLY CUSTOMER CHARGES IS WARRANTED?

A. Yes. I recommend that the Commission limit its increase in the Company's monthly customer charges to the percentage rate increase in class revenue requirement. In the context of my proposed revenue apportionment this would be a 14.34 percent increase for residential customers at the Company's proposed overall requested rate increase. This would correspond to a roughly $2.00 increase in the monthly customer charge, or an increase from the current $14.00 per month to $16.00 per month. I further recommend that any increase in customer charges be subject to scalebacks to reflect changes in allocated class revenue increases pursuant to Commission Orders.

X. CONCLUSION AND RECOMMENDATIONS

Q. WHAT IS YOUR RECOMMENDATION BASED ON CURRENT MACROECONOMIC CONDITIONS?

A. I recommend the Commission take into consideration current macroeconomic conditions, including consumer affordability concerns, when determining just and reasonable rates for the Company. Average Pennsylvanians are struggling with lingering inflation concerns besides looking at potential additional concerns placed on them due to fallout from the conflict in the Persian Gulf. This while the Company has seen increasing stock prices for its shareholders and no obvious market distress. The Commission, in particular, should require some level of shared burden, balancing consumer affordability concerns with the financial interests of the Company. I have been advised by counsel that the OCA will argue in their legal briefs that the Commission

should not grant NFG any increase in this proceeding due to the substantial affordability concerns that consumers are facing.

Q. WHAT IS YOUR OVERALL RECOMMENDATION REGARDING REGULATORY LAG?

A. The Company has not demonstrated that the existing regulatory framework in Pennsylvania is failing to support timely and adequate cost recovery. Rather, the evidence suggests that regulatory lag is already being effectively managed. The Commission should reaffirm the value of regulatory lag as a structural feature of traditional ratemaking and recognize that further erosion of this principle is neither necessary nor justified in this case.

Q. WHAT IS YOUR POSITION ON THE CONTINUATION OF THE COMPANY'S WNA?

A. I recommend that the Commission affirmatively discontinue the current WNA mechanism. The mechanism has failed to produce balanced outcomes for ratepayers, functioning as an asymmetric surcharge on customers' bills for the two full years the mechanism has been in operation, even though the mechanism was designed to symmetrically provide both surcharges and credits to customers. The WNA is also not required to address regulatory lag concerns of the Company given the Company's use of a FPFTY and DSIC.

Q. DO YOU HAVE ANY ALTERNATIVE PROPOSAL IF THE COMMISSION DECIDES TO CONTINUE THE WNA?

A. If the Commission decides to continue the WNA, I recommend that it remain as a five-year pilot program rather than being adopted as a permanent mechanism. This will allow the Commission the opportunity to routinely reevaluate the WNA to ensure that the mechanism is not producing negative outcomes for ratepayers. I further recommend that the Commission increase

the deadband from three percent to five percent and eliminate the months of October and May from the WNA period. This would strengthen ratepayer protections and would furthermore make the Company's WNA pilot consistent with the recent WNA pilot the Commission approved for Columbia Gas.

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE PROPOSED ENERGY EFFICIENCY PROGRAM RIDER?

A. I recommend the Commission reject the proposed EE Program rider. The proposed rider fails to satisfy any of the three commonly held evaluation criteria for a sound cost tracker mechanism. Specifically, the EE Program expenses are not substantial, not outside the control of the utility, and are neither unpredictable nor volatile. Therefore, the costs associated with the Company's proposed EE Program do not have the characteristics that are conducive for recovery through a cost tracker outside of base rates.

Q. WHAT ARE YOUR RECOMMENDATIONS REGARDING THE CLASSIFICATION OF DISTRIBUTION MAINS INVESTMENT AND THE USE OF ZERO INTERCEPT STUDY IN ITS ALLOCATED COST OF SERVICE STUDY?

A. I recommend the Commission reject the Company's proposed ZIS approach. ZIS and related MSS that are used to classify distribution mains investments are fundamentally flawed and provide little to no value in setting just and reasonable rates. In the alternative I recommend that the Commission approve an alternative classification of distribution mains that incorporates a P&A cost allocation method using weights based on the Company's test year system load factor. These recommendations better reflect cost causation principles and provide a more reasonable basis for allocating costs among customer classes.

Q. WHAT IS YOUR RECOMMENDATION REGARDING THE COMPANY'S PROPOSED REVENUE APPORTIONMENT.

A. I recommend the Commission adopt a more reasonable revenue apportionment method based on my alternative ACOSS results that also limits the rate increase compared to the Company's proposed revenue allocation method. First, I recommend that classes with current relative cost parity ratios below 0.95 receive a rate increase equal to 1.15 times the system average increase. Second, I recommend that classes with current relative cost parity ratios greater than 1.05 receive a rate increase equal to 0.85 times the system average increase. Finally, I recommend that the remaining rate increase be equally allocated to remaining rate classes with current relative cost parity ratios of between 0.95 and 1.05.

Q. WHAT ARE YOUR CUSTOMER CHARGE RECOMMENDATIONS AND CONCLUSIONS?

A. I recommend that the Commission reject the Company's proposed increase in residential and commercial customer charges. An analysis of customer-related costs finds that residential rate classes are currently recovering a majority of customer-related costs through monthly customer charges. The proposal would also negatively impact the public policy goals of energy efficiency and would burden low-use customers with a greater than average portion of any proposed increase in the case. The Commission should keep the Company's current customer charges for all customers.

Q. DO YOU HAVE AN ALTERNATIVE RECOMMENDATION IF THE COMMISSION DECIDES AN INCREASE IN MONTHLY CUSTOMER CHARGES IS WARRANTED?

A. Yes. I recommend that the Commission limit its increase in the Company's monthly customer charges to the percentage rate increase class revenue requirement. In the context of my proposed revenue apportionment this would be a 14.34 percent increase for residential customers at the Company's proposed overall requested rate increase. This would correspond to a roughly $2.00 increase in the monthly customer charge, or an increase from the current $14.00 per month to $16.00 per month. I further recommend that any increase in customer charges be subject to scalebacks to reflect changes in allocated class revenue increases pursuant to Commission Orders.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes.

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EDUCATION

M.A. in Economics, Kansas University, 2009

B.A. in Business Economics, Buena Vista University, 2007

PROFESSIONAL EXPERIENCE

Acadian Consulting Group, Baton Rouge, Louisiana

Spring 2025 – Present	Senior Research Consultant
Summer 2021 – Spring 2025	Research Consultant
Summer 2016 – Summer 2021	Research Associate
Winter 2011 – Summer 2016	Senior Research Analyst

Kansas Corporation Commission, Topeka, Kansas

Utilities Division

Summer 2011 – Winter 2011 Senior Research Economist

Research Division

Spring 2009 – Summer 2011 Research Analyst

Kansas Energy Council

Summer 2008 – Spring 2009 Research Assistant

PUBLICATIONS AND REPORTS

1. The challenges of the regulatory review of diversification mergers. With Dr. David E. Dismukes. *The Electricity Journal* 29 (2016) 8-14. (May 2016)

PROFESSIONAL AND CIVIC PRESENTATIONS

1. "Status and Future of Natural Gas Supply and Infrastructure" (2026). Prepared for the Michigan State University, Institute of Public Utilities (IPU) Grid School. April 14, 2026.

2. "Natural Gas Distribution" (2025). Prepared for the Louisiana State University, Center for Energy Studies, Energy Fundamentals 2025. June 24 and July 8, 2025.

3. "Development Trends, Issues, and Challenges with Clean Hydrogen Production" (2025). Prepared for the Michigan State University, Institute of Public Utilities, Annual Regulatory Studies Program. April 15, 2025.

4. "Status and Future of Natural Gas Supply and Infrastructure" (2025). Prepared for the Michigan State University, Institute of Public Utilities, Annual Regulatory Studies Program. April 8, 2025.

5. "Observed Impact of Formula Rate Plans Across the United States" (2024). Prepared for Arizona Corporation Commission Formula Rate Plan Workshop. October 3, 2024.

EXPERT WITNESS, LEGISLATIVE, AND PUBLIC TESTIMONY; EXPERT REPORTS, RECOMMENDATIONS, AND AFFIDAVITS

1. Expert Testimony. Docket No. R-2025-3059523 (2026). Before the Pennsylvania Public Utilities Commission. *Pennsylvania Public Utilities Commission v. UGI Utilities, Inc. – Gas Division.* On Behalf of the Pennsylvania Office of Consumer Advocate. Issues: Macroeconomy, Alternative Regulation, Regulatory Lag, Cost of Service, Rate Design.

2. Expert Testimony. Docket No. 2025-325-E (2026). Before the Public Service Commission of South Carolina. *In the Matter of the Application of Dominion Energy South Carolina, Inc. for Authority to Adjust and Increase its Retail Electric Rates and Charges.* On Behalf of the South Carolina Department of Consumer Affairs. Issues: Cost of Service, Rate Design, Alternative Regulation.

3. Expert Testimony. Docket No. 2025.09.072 (2026). Before the Public Service Commission of the State of Montana. *In the Matter of the Application of Montana-Dakota Utilities Co. for Authority to Establish Increased Rates for Electric Service.* Of Behalf of the Montana Consumer Counsel. Issues: Cost Trackers, Cost of Service, Rate Design.

4. Expert Testimony. Case Nos. 25-0594-WW-AIR and 25-0595-WW-ATA (2026). Before the Public Utilities Commission of Ohio. *In the Matter of the Application of Aqua Ohio, Inc. to Increase its Rates and Charges for its Waterworks Service.* On Behalf of the Staff of the Public Utilities Commission of Ohio Rates and Analysis Department, Regulatory Service Division. Issues: Cost of Service, Rate Design.

5. Expert Testimony. Case No. 25-0593-ST-AIR (2026). Before the Public Utilities Commission of Ohio. *In the Matter of the Application of Aqua Ohio Wastewater, Inc. to Increase Rates for Sewer Service.* On Behalf of the Staff of the Public Utilities Commission of Ohio Rates and Analysis Department, Regulatory Service Division. Issues: Cost of Service, Rate Design.

6. Expert Testimony. Docket No. UG-250610 (2026). Before the Washington Utilities and Transportation Commission. *Washington Utilities and Transportation Commission v.*

Northwest Natural Gas Company. On Behalf of the Washington State Office of the Attorney General Public Counsel Unit. Issues: Cost of Service, Rate Design.

7. Expert Testimony. D.P.U. 25-85 (2025). Before the Commonwealth of Massachusetts Department of Public Utilities. *Petition of Liberty Utilities (New England Natural Gas Company) Corp. d/b/a Liberty, pursuant to G.L. c. 164, § 94 and 220 CMR 5.00 for Approval of a General Increase in Base Distribution Rates for Gas Service and a Performance-Based Ratemaking Plan.* On Behalf of the Massachusetts Office of the Attorney General. Issues: Cost Benchmarking.

8. Expert Testimony. Docket No. 2025-172-E (2025). Before the Public Service Commission of South Carolina. *In the Matter of: Application of Duke Energy Carolinas, LLC for Authority to Adjust and Increase its Electric Rates and Charges.* On Behalf of the South Carolina Department of Consumer Affairs. Issues: Cost of Service, Rate Design, Alternative Regulation.

9. Expert Testimony. Docket No. 2025-154-E (2025). Before the Public Service Commission of South Carolina. *In the Matter of: Application of Duke Energy Progress, LLC for Authority to Adjust and Increase its Electric Rates and Charges.* On Behalf of the South Carolina Department of Consumer Affairs. Issues: Cost of Service, Rate Design, Alternative Regulation.

10. Expert Testimony. Cause No. 46258. (2025). Before the Indiana Utility Regulatory Commission. *Petition of Indianapolis Power & Light Company D/B/A AES Indiana ("AES Indiana") for Authority to Increase Rates and Charges for Electric Utility Service Through a Phase-In Rate Adjustment; and For Approval of Related Relief, Including (1) Revised Depreciation Rates, Including Cost of Removal Less Salvage and Updated Depreciation Expense; (2) Accounting Relief, Including Deferrals and Amortizations, (3) Inclusion of Capital Investment, (4) Rate Adjustment Mechanism Proposal, Including a New Propoerty Tax Rider, and (5) New Schedules of Rates, Rules and Regulations for Service.* On Behalf of the Indiana Office of Utility Consumer Counselor. Issues: Cost of Service, Rate Design.

11. Expert Testimony. Docket Nos. R-2025-3055010, R-2025-3055011, and R-2025-3055012. (2025). Before the Pennsylvania Public Utilities Commission. *Pennsylvania Public Utility Commission v. The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water.* On Behalf of the Pennsylvania Office of Consumer Advocate. Issues: Alternative Regulation, Regulatory Lag.

12. Expert Testimony. Docket No. G-04204A-24-0237. (2025). Before the Arizona Corporation Commission. *In the Matter of the Application of UNS Gas, Inc. for the Establishment of Just and Reasonable Rates and Charges Designed to Realize a Reasonable Rate of Return on the Fair Value of the Properties of UNS Gas, Inc. Devoted to its Operations Throughout the State of Arizona and for Related Approvals.* On Behalf of the Staff of the Arizona Corporation Commission. Issues: Cost of Service, Rate Design.

13. Expert Testimony. Docket No. R-2025-3054394. (2025). Before the Pennsylvania Public Utilities Commission. *Pennsylvania Public Utility Commission v. Citizens' Electric Company of Lewisburg.* On Behalf of the Pennsylvania Office of Consumer Advocate. Issues: Cost of Service, Rate Design.

14. Expert Testimony. Docket No. R-2025-3054393. (2025). Before the Pennsylvania Public Utilities Commission. *Pennsylvania Public Utility Commission v. Valley Energy, Inc.* On Behalf of the Pennsylvania Office of Consumer Advocate. Issues: Cost of Service, Rate Design.

15. Expert Testimony. Docket No. R-2025-3054392. (2025). Before the Pennsylvania Public Utilities Commission. *Pennsylvania Public Utility Commission v. Wellsboro Electric Company.* On Behalf of the Pennsylvania Office of Consumer Advocate. Issues: Cost of Service, Rate Design.

16. Expert Testimony. Docket No. R-2025-3053499. (2025). Before the Pennsylvania Public Utilities Commission. *Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc.* On Behalf of the Pennsylvania Office of Consumer Advocate. Issues: Decoupling, Regulatory Lag.

17. Expert Testimony. Cause No. 46120. (2025). Before the Indiana Utility Regulatory Commission. *Verified Petition of NIPSCO Generation LLC for Certain Determinations by the Commission with Respect to its Jurisdiction Over Petitioner's Activities as a Non-Retail Generator of Electric Power.* On Behalf of the Indiana Office of Utility Consumer Counselor. Issues: Rate Design, Large Data Center Loads.

18. Expert Testimony. Case No. U-21859. (2025). Before the Michigan Public Service Commission. *In the matter of the application of Consumers Energy Company for Ex Parte Approval of Certain Amendments to Rate GPD.* On Behalf of the Michigan Attorney General. Issues: Rate Design, Large Data Center Loads.

19. Expert Testimony. Docket No. R-2025-3053112. (2025). Before the Pennsylvania Public Utilities Commission. *Pennsylvania Public Utility Commission v. Philadelphia Gas Works.* On Behalf of the Pennsylvania Office of Consumer Advocate. Issues: Decoupling, Regulatory Lag.

20. Expert Testimony. Docket No. E-01773A-24-0220. (2025). Before the Arizona Corporation Commission. *In the Matter of the Application of Arizona Electric Power Cooperative, In. for a Hearing to Determine the Fair Value of its Property for Ratemaking Purposes, to Fix a Just and Reasonable Return Thereon and To Approve Rates Designed to Develop Such Return.* On Behalf of Arizona Corporation Commission Staff. Issues: Cost of Service, Qualifying Facilities.

21. Expert Testimony. Case No. U-21816. (2025). Before the Michigan Public Service Commission. *In the matter of Consumer Energy Company's application for the regulatory*

reviews, revisions, determinations, and/or approvals necessary to fully comply with Public Act 295 of 2008, as amended by Public Act 235 of 2023. On Behalf of the Attorney General. Issues: Capital Expense, Cost Recovery

22. Expert Testimony. Cause No. 46120. (2024). Before the Indiana Utility Regulatory Commission. *Petition of Northern Indiana Public Service Company LLC Pursuant to Ind. Code §§ 8-1-2-42.4, 8-1-2-61 and 8-1-2.5-6 for (1) Authority to Modify its Retail Rates and Charges for Electric Utility Service Through a Phase in of Rates; (2) Approval of New Schedules of Rates and Charges, General Rules and Regulations, and Riders (both Existing and New); (3) Approval of Revised Common and Electric Depreciation Rates Applicable to its Electric Plant in Service; (4) Approval of Necessary and Appropriate Accounting Relief, Including, but Limited to, Authority to Capitalize as Rate Base All Expenditures for Improvements to Petitioner's Information Technology Systems through the Design, Development, and Implementation of a Work and Asset Management ("WAM") Program, to the Extent Necessary; and (5) Approval of Alternative Regulatory Plans for the Partial Waiver of 170 IAC 4-1-16(f) and Proposed Remote Disconnection and Reconnection Process and, to the Extent Necessary, Implementation of a Low Income Program.* On Behalf of the Indiana Office of Utility Consumer Counselor. Issues: Cost of Service, Rate Design.

23. Expert Testimony. Cause No. 46097. (2024). Before the Indiana Utility Regulatory Commission. *In the Matter of the Verified Petition of Indiana Michigan Power Company for Approval of Modifications to its Industrial Power Tariff – Tariff I.P.* On Behalf of the Indiana Office of Utility Consumer Counselor. Issues: Rate Design, Large Data Center Loads.

24. Expert Report. Docket No. AHD-00000J-23-0273. (2024). Before the Arizona Corporation Commission. *In the Matter of the Application of the Arizona Corporation Commission's Exploration of Changes to the Up to 10% Annual Reduction in the Export Rate and the 10-Year Export Rate Effective Period Under the Resource Comparison Proxy Methodology Approved in the Value and Cost of Distributed Generation Docket (E-00000J-14-0023).* On Behalf of the Arizona Corporation Commission Staff. Issues: Value of Solar.

25. Expert Testimony. Case No. U-21585. (2024). Before the Michigan Public Service Commission. *In the Matter of the Application of Consumers Energy Company for Authority to Increase its Rates for the Generation and Distribution of Electricity and Other Relief.* On Behalf of the Attorney General. Issues: Capital Expenses.

26. Expert Report. *Review of LPSC Rules Regarding Distributed Generation: Report on Phase II of Rule-Making.* Docket No. R-33929. (2019). *In Re: Review of Policies Related to Customer-owned Solar Generation and Possible Modification of the Commission's Current Net Metering Rules.* On behalf of Louisiana Public Service Commission. Issues: Solar Net Metering.

27. Expert Report. (2011). *2011 Kansas Generation Planning Survey*. On behalf of the Kansas Corporation Commission Staff.

28. Expert Testimony. Docket No. 11-KCPE-581-PRE. (2011). Before the Kansas Corporation Commission. *In the Matter of the Petition of Kansas City Power & Light Company ("KCP&L") for Determination of the Ratemaking Principles and Treatment That Will Apply to the Recovery in Rates of the Costs to be Incurred by KCP&L for Certain Electric Generation Facilities Under K.S.A. 66-1239.* On Behalf of the Kansas Corporation Commission Staff. Issues: System Planning, Predetermination.

29. Expert Testimony. Docket No. 10-KCPE-795-TAR. (2010). Before the Kansas Corporation Commission. *In the Matter of the Application of Kansas City Power & Light Company for Approval to Implement a Portfolio of Demand Side Management Programs Including Affordability, Energy Efficiency, Demand Response and Educational Programs, and to Implement a Rider for Recovery of Program Costs and Incentives Associated with this Portfolio.* On Behalf of the Kansas Corporation Commission Staff. Issues: Demand Side Management, Cost-Benefit Analyses.

30. Expert Testimony. Docket No. 10-WSEE-775-TAR. (2010). Before the Kansas Corporation Commission. *In the Matter of the Application of Westar Energy, Inc. and Kansas Gas and Electric Company for an Order Authorizing them to participate in Efficiency Kansas, Approve the SimpleSavings Program Rider, and related cost recovery.* On Behalf of the Kansas Corporation Commission Staff. Issues: Demand Side Management, Cost-Benefit Analyses.

31. Expert Testimony. Docket No. 10-BHCG-639-TAR. (2010). Before the Kansas Corporation Commission. *In the Matter of the Application of Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy for Approval to Implement Black Hills Energy's Five-Year Energy Efficiency Plan Consisting of Natural Gas Energy Efficiency Programs to Improve Building and Equipment Efficiency and to Educate About Efficient Energy Usage, to Provide for Program Cost Recovery Through a Rider Mechanism, Permit the Implementation of a Revenue Normalization Mechanism to Replace the Weather Normalization Adjustment, a Performance Incentive Mechanism, and Appropriate Accounting Authority to Defer Expenses and Revenues Associated with the Filing.* On Behalf of the Kansas Corporation Commission Staff. Issues: Demand Side Management, Cost-Benefit Analyses.

32. Expert Testimony. Docket No. 10-EPDE-497-TAR. (2010). Before the Kansas Corporation Commission. *In the Matter of the Application of the Empire District Electric Company for Approval to Implement its Portfolio of Energy Efficiency and Demand Response Programs for its Kansas Customers, to Provide for Program Cost Recovery and Lost Revenue Through a Rider Mechanism, to Obtain any Necessary Waivers for the Commission, and for Appropriate Accounting Authority to Defer Expenses and Revenues Associated with the Filing.* On Behalf of the Kansas Corporation Commission Staff. Issues: Demand Side Management, Cost-Benefit Analyses.

33. Expert Testimony. Docket No. 10-KGSG-421-TAR. (2010). Before the Kansas Corporation Commission. *In the Matter of the Application of Kansas Gas Service, a Division of ONEOK, Inc., for Approval to Implement the Efficiency Kansas Energy Efficiency Program, to Implement Natural Gas Energy Efficiency Programs to Improve Building and Equipment Efficiency and to Educate about Efficient Energy Usage, To Provide for Program Cost Recovery Through a Rider Mechanism, to Establish Administrative Charges and a Program Initiation Fee, Permit the Implementation of a Revenue Decoupling Mechanism, and Appropriate Accounting Authority to Defer Expenses and Revenues Associated with the Filing.* On Behalf of the Kansas Corporation Commission Staff. Issues: Demand Side Management, Cost-Benefit Analyses.

Table of Exhibits

Title	Exhibit
Commission Alternative Regulation Consideration (§ 69.3302)	Exhibit MWD-1
Survey of Approved Pennsylvania Natural Gas WNA Mechanisms	Exhibit MWD-2
Summary of Results of Company's Proposed ACOSS	Exhibit MWD-3
Correlation of Customers and Distribution Mains Additions	Exhibit MWD-4
Summary of Results of ACOSS Using Seaboard Allocation	Exhibit MWD-5
Summary of Alternative ACOSS	Exhibit MWD-6
Summary of Company's Proposed Revenue Allocation	Exhibit MWD-7
Summary of Results of Alternative Revenue Allocation	Exhibit MWD-8
Analysis of Customer-Related Costs	Exhibit MWD-9

Commission Alternative Regulation Consideration (§ 69.3302)

	Commission Consideration Criteria	National Fuel Claim	Response
§ 69.3302(a)(1)	How the ratemaking mechanism and rate design align revenues with cost causation principles as to both fixed and variable costs.	National Fuel Gas's WNA is designed to recover distribution revenues needed to satisfy the cost-of-service requirement determined in this proceeding, while mitigating the variance between actual and projected distribution revenues due to weather. The Company recovers a significant portion of fixed costs through volumetric rates. These fixed costs do not vary with the amount of gas delivered to customers and are composed of fixed operation and maintenance expenses, administrative and general expenses, depreciation, certain taxes, a portion of working capital requirements, and return on investment. These costs also do not vary in the short-term with changes in temperature. In the absence of a rate design that affords the Company the opportunity to recover all fixed costs in a fixed monthly charge, the WNA mechanism better aligns distribution revenues with cost causation principles.	The WNA does not address the Commission's consideration criteria aligning revenues with cost causation. The WNA is premised on ensuring the Company will recover its annual fixed costs of providing gas distribution service; however, the WNA adjustment is applied as a variable charge to customer's bills.
§ 69.3302(a)(2)	How the ratemaking mechanism and rate design impact the fixed utility's capacity utilization.	The WNA mechanism indirectly supports efficient capacity utilization by stabilizing the recovery of fixed distribution costs, which are incurred to maintain National Fuel Gas's infrastructure and capacity to serve customers regardless of fluctuations in gas usage. Since these fixed costs do not change with short-term usage variations, the WNA ensures that the Company can continue investing in the infrastructure necessary to meet peak demand and long-term capacity needs and be compensated for these investments. By supporting revenue stability, the WNA reduces under-recovery risks during periods of lower gas usage, ensuring that the revenues collected align with customers' continued reliance on the utility's fixed assets that provide peak service.	Proposed WNA does not impact capacity utilization, as the determining metric for the charge is weather, not utilization.
§ 69.3302(a)(3)	Whether the ratemaking mechanism and rate design reflect the level of demand associated with the customer's anticipated consumption levels.	Customer specific usage factors corresponding to their individual demand is continually updated through the WNA formula and reflects the level of demand associated with the customer's anticipated consumption levels. In this proceeding, the Company is also proposing to set Normal Heating Degree Days using a 10-year average rather than a 15-year average, which more accurately captures recent warming trends. Using a more current weather baseline ensures that the WNA formula better aligns normalized usage with customers' anticipated consumption levels under today's climate conditions.	The WNA adjustment mechanism creates the anomaly where customers see rate increases when they reduce consumption and rate decreases when they increase consumption. If the WNA is generating revenue, then it inherently does not reflect the level of demand associated with the customer's anticipated consumption levels, because the WNA only generates revenue if the demand is less than anticipated.
§ 69.3302(a)(4)	How the ratemaking mechanism and rate design limit or eliminate interclass and intraclass cost shifting.	National Fuel Gas's WNA is applied on a customer-specific basis and is designed to be revenue-neutral within each customer class, such that it does not create or exacerbate cross-subsidization either within or across classes.	The WNA may have led to intraclass cost shifting to the extent that smaller use residential customers typically have a greater percentage of natural gas use that is temperature-sensitive compared to larger use residential customers.
§ 69.3302(a)(5)	How the ratemaking mechanism and rate design limit or eliminate disincentives for the promotion of efficiency programs.	The Company's WNA only addresses variations due to weather and does not affect customers' ability to pursue energy efficiency measures. Further, the Company continues and will continue to promote the use of energy efficiency measures to its customers as the WNA removes the financial disincentive for National Fuel Gas to promote energy efficiency.	The WNA does not limit or eliminate disincentives for the promotion of energy efficiency. The WNA is solely tied to adjustment in customer usage attributed to changes in heating requirements and is not impacted by a reduction in customer use due to energy efficiency initiatives. The Company has not demonstrated that the lack of a WNA would present a major obstacle for the promotion of energy efficiency programs.
§ 69.3302(a)(6)	How the ratemaking mechanism and rate design impact customer incentives to employ efficiency measures and distributed energy resources.	Customers retain strong incentives to reduce usage because the commodity and other charges remain volumetric. The proposed WNA does not eliminate these price signals, so lower usage still results in lower bills.	The WNA may be perceived as a disincentive to employ energy efficiency measures for customers whose energy efficiency initiative takes place during periods of warmer than normal weather. These customers will see increased WNA charges after reducing usage through implementing energy efficiency initiatives.
§ 69.3302(a)(7)	How the ratemaking mechanism and rate design impact low-income customers and support consumer assistance programs.	Under the proposed WNA mechanism, customers who are currently enrolled to pay their bills based on a percentage of their household income see little to no impact to their bills under the WNA mechanism.	The WNA may harm low-income customers as these customers have less ability to weatherize homes to reduce impact of weather fluctuations on consumption.
§ 69.3302(a)(8)	How the ratemaking mechanism and rate design impact customer rate stability principles.	The American Gas Association Gas Rate Fundamentals book (Pages 152 – 156) states: "The goal of stability recognizes historical relationships among customers in terms of the proportion of system costs each customer group bears. Stability leads to a policy of gradualism in rate changes if substantial increases (or decreases) are called for in the context of a single rate case. Changes in gas utility pricing policy should be imposed gradually so that customers can adjust and any adverse impacts on the customers' operation are minimized." The WNA mechanism provides customers with more stable annual bills and directly mitigates volatility in their monthly costs. Customers would pay for the costs assigned to the volumetric base rate in the most recent rate case and customers would not pay more or less than that amount solely because the actual weather for the month the customers are billed is different than the weather used to determine the rate design of the volumetric base rate.	The WNA adds another surcharge to customers' bills without any showing that the WNA would reduce the frequency of base rate case filings. It therefore does not improve rate stability.

Commission Alternative Regulation Consideration (§ 69.3302)

	Commission Consideration Criteria	National Fuel Claim	Response
§ 69.3302(a)(9)	How weather impacts utility revenue under the ratemaking mechanism and rate design.	The Company's WNA adjusts customers' bills due to variations from normal weather during the heating season months (October through May), and it only mitigates the revenue effect of weather on the original rate design of the volumetric base rate. Without it, the Company is deprived of the opportunity to recover the Commission approved distribution revenue requirement for the applicable classes during times when warmer than normal weather occurs. Moreover, the absence of a WNA places the Company in a position of receiving a higher amount of revenues from customers when the weather is colder than normal. The WNA avoids both scenarios by minimizing the impact of weather on the Company's revenues and customers' bills.	While the WNA is premised on reducing risks to the Company revenue stability caused by fluctuations in weather conditions, in practice it is not a revenue neutral mechanism. None of the two full heating seasons the WNA has been in effect for (2023-2024, and 2024-2025) have produced net credits for ratepayers. Indeed, over these 2 heating seasons the Company has collected on net nearly $9.2 million from ratepayers through the WNA.
§ 69.3302(a)(10)	How the ratemaking mechanism and rate design impact the frequency of rate case filings and affect regulatory lag.	The WNA does not impact the Company's rate case frequency nor it effects regulatory lag.	Historically the Company has filed multiple rate case over the last decade, despite possessing the WNA. This is unlikely to change and the WNA does not prevent the Company from seeking additional rate increases driven by future investment needs or higher expenses and associated cost recovery. The WNA does, however, weaken the positive impacts regulatory lag has on promoting cost containment between rate cases. Regulatory lag has long been recognized as a key component of the overall regulatory compact that disciplines utility operational and investment decisions between rate cases. Regulatory lag in particular diminishes incentives for utilities to overcapitalize since the inefficiencies associated with overcapitalization are passed directly to shareholders until reviewed by the Commission in the utility's next rate case.
§ 69.3302(a)(11)	If or how the ratemaking mechanism and rate design interact with other revenue sources, such as Section 1307 automatic adjustment surcharges, 66 Pa.C.S. § 1307 (relating to sliding scale of rates; adjustments), riders such as 66 Pa.C.S. § 2804(9) (relating to standards for restructuring of electric industry) or system improvement charges, 66 Pa.C.S. § 1353 (relating to distribution system improvement charge).	National Fuel Gas's WNA is solely focused on recovering costs that are part of the base revenue requirement and does not interact with other revenue sources, such as Section 1307 automatic adjustment surcharges, restructuring riders, or system improvement charges under Section 1353.	The WNA applies only to base rates and does not impact surcharges.
§ 69.3302(a)(12)	Whether the alternative ratemaking mechanism and rate design include appropriate consumer protections.	National Fuel Gas's WNA includes several consumer protections to ensure fairness and transparency, as follows: a. No Over-Recovery of Revenue: The WNA mechanism results in an adjusted bill that reflects the revenues that would be recovered under normal weather, i.e., the same normal weather used to set rates. The Company does not recover additional distribution revenues due to colder than average temperatures that result in higher-than-normal usage from customers. This is ensured by limiting the mechanism to the heating season and having a deadband. b. No Cross-Subsidization: The WNA is customer-specific. c. Regulatory Oversight: The WNA is subject to Commission review and regulatory reporting requirements to ensure compliance with approved revenue stabilization objectives and to protect consumers from unintended rate impacts. d. Customer Transparency: National Fuel Gas provides clear bill disclosures and customer education regarding WNA adjustments, ensuring consumers understand how the mechanism works and how it impacts their bills.	The WNA does not include sufficient consumer protections. These include checks on over-earnings to prevent overall rate increases through WNA reconciliations.
§ 69.3302(a)(13)	Whether the alternative ratemaking mechanism and rate design are understandable to consumers.	The WNA is not a new concept to the regulated utility industry and similar versions have been successfully implemented by other Pennsylvania natural gas distribution companies. The WNA tariff provides detailed information to the customer of how the mechanism works and the adjustments are displayed separately on bills, ensuring full transparency. The Company has also made available Frequently Asked Questions (FAQs) on its website https://www.nationalfuel.com/utility/weather-normalizationadjustment-pa-home-biz/ Additionally, the Company sent customers a WNA reminder and plain language insert September 2025, ahead of the winter heating season.	Customers have no means of anticipating future WNA changes as it is impossible for customers to forecast WNA charges in advance and likely difficult for customers to calculate even after the fact. For these reasons elements of the WNA likely not understandable to customers and effectively is viewed as just another surcharge present on the customer's bill.
§ 69.3302(a)(14)	How the ratemaking mechanism and rate design will support improvements in utility reliability.	The proposed WNA targets the revenue requirement that would have been already subject to scrutiny and approved by the Commission, meaning that its prudency and reasonableness would have been reviewed and deemed appropriate to support reliability driven initiatives. The proposed WNA would help minimize the volatility of the recovery of these costs.	The WNA has not lead to changes in the Company's quality of service, either positively or negatively. The WNA is not tied to achievement of increased service reliability performance, but has reduced the positive incentive of regulatory lag for the Company to control costs and led to customer confusion. The Company retains the ability to file rate cases using a projected future test year to address concerns associated with capital improvements required to facilitate reliable delivery of natural gas.

Survey of Approved Pennsylvania Natural Gas WNA Mechanisms

Witness: Deupree
Docket No. R-2025-3059428
Exhibit MWD-2

Utility	Docket No.	Filing Year	Decision Type	Customer Applicability	Pilot (Y/N)	Pilot Duration	Deadband	Heating Months	NHDD Methodology	Customer Education	Reporting Requirements	Other
National Fuel Gas Distribution Corporation	R-2022-3035730	2022	Settled	Residential, CAP, Commercial, and Public Authority	Y	5 years	3%	October-May	15-year average	Provide WNA and bill impact information.	Two annual WNA reports by month and customer class providing: (1) bills subject to WNA, (2) total bills, (3) volume adjustment, (4) revenue adjustment, (5) NHDDs and AHDDs.	N/A
Peoples Natural Gas Company	R-2023-3044549	2023	Partially settled	Residential, Commercial SGS, and Commercial MGS	N	N/A	3%	October-May	Based on HDDs adopted in R-2023-3044549 rate case	N/A	Annual report due September 1 providing: (1) monthly WNA billed revenues, (2) AHDD and NHDD data, (3) customer count and bill impacts by class.	(1) Separate line item on customer bills; (2) Bills rendered calculation basis; (3) May adjustment capped at 100% of billed distribution amount.
PECO Energy Company	R-2024-3046932	2024	Partially settled	---------- The Commission agreed with the ALJs' findings and denied PECO's request to implement a WNA ----------								
Pike County Light & Power Company	R-2024-3052357	2024	Partially settled	---------- The Company proposed a WNA mechanism but withdrew the proposal pursuant to settlement ----------								
Columbia Gas of Pennsylvania, Inc.	R-2025-3053499	2025	Litigated	RSS, RDS, and CAP	Y	Until final order in next base rate case	5%	November-April	10-year average	N/A	Annual report due October 1 providing: (1) monthly WNA computations and (2) all underlying supporting data.	N/A
UGI Utilities, Inc.	R-2024-3052716	2025	Settled	R, RT, N, and NT	Y	Until October 31, 2027	3%	October-April	15-year average	Review/revise WNA pilot communication materials with party input (review due 12/31/2025).	Two annual WNA reports by month and customer class providing: (1) bills subject to the WNA, (2) total bills, (3) volume and revenue adjustments, (4) NHDDs and AHDDs, (5) number and percentage of bills adjusted upward or downward due to warmer or colder than normal weather.	(1) CAP customers on percent-of-income bills exempt from WNA beginning November 1, 2025; (2) Future filing must evaluate use of rolling 10-year HDD average.

Summary of Results of Company's Proposed ACOSS: Relative Rate of Return at Current Rates (Dollars in Thousands)

Line No.	Account Description	Total Company	Residential Service	Commercial and Public Authority Service: Extra Small (LE 250)	Commercial and Public Authority Service: Small (GT 250)	Commercial and Public Authority Service: Large	Natural Gas Vehicles (NGV)	Industrial Service: Small (SVIS)	Industrial Service: Intermediate (IVIS)	Industrial Service: Large (LVIS)	Industrial Service: Extra Large (LIS)
1	**Rate Base**										
2	Plant in Service	$957,237	$ 751,162	$ 42,731	$ 46,746	$ 65,981	$ 1,552	$1,806	$ 26,103	$10,005	$ 11,150
3	Accumulated Reserve	(320,571)	(253,545)	(14,521)	(16,008)	(20,463)	(488)	(626)	(8,242)	(3,259)	(3,419)
4	Other Rate Base Items	(65,085)	(51,090)	(2,879)	(3,019)	(4,547)	(91)	(108)	(1,832)	(718)	(801)
5	**Total Gas Rate Base**	**$571,582**	**$ 446,527**	**$ 25,330**	**$ 27,719**	**$ 40,971**	**$ 974**	**$1,072**	**$ 16,029**	**$ 6,028**	**$ 6,930**
6	**Operating Income**										
7	**Operating Revenues at Current Rates**										
8	Gas Service Revenue	$136,735	$ 97,367	$ 6,819	$ 6,989	$ 13,908	$ 131	$ 444	$ 5,876	$ 2,730	$ 2,470
9	Gas Cost	124,571	100,820	6,010	7,790	6,609	398	364	2,175	229	176
10	Other Revenues	4,219	3,512	173	191	195	7	9	76	26	29
11	**Total Operating Revenues**	$265,524	$ 201,699	$ 13,003	$ 14,969	$ 20,712	$ 536	$ 817	$ 8,127	$ 2,985	$ 2,675
12	**Operating Expenses**										
13	O&M and A&G Expenses	$204,276	$ 166,814	$ 9,875	$ 11,296	$ 10,251	$ 473	$ 534	$ 3,589	$ 737	$ 708
14	Depreciation and Amortization Expense	25,074	19,895	1,156	1,266	1,581	42	51	610	226	249
15	Taxes Other than Income	2,490	1,992	125	131	139	3	6	53	19	21
16	Total Income Taxes	(2,340)	(1,177)	(121)	(145)	(476)	(2)	(12)	(209)	(106)	(91)
17	**Total Operating Expenses**	$229,499	$ 187,525	$ 11,034	$ 12,547	$ 11,495	$ 516	$ 578	$ 4,043	$ 876	$ 886
18	**Total Operating Income**	**$ 36,024**	**$ 14,174**	**$ 1,969**	**$ 2,422**	**$ 9,218**	**$ 21**	**$ 238**	**$ 4,084**	**$ 2,109**	**$ 1,789**
19	**Rate of Return on Rate Base ("ROR")**	**6.30%**	**3.17%**	**7.77%**	**8.74%**	**22.50%**	**2.12%**	**22.24%**	**25.48%**	**34.99%**	**25.82%**
20	**Relative Rate of Return ("RROR")**	**1.00**	**0.50**	**1.23**	**1.39**	**3.57**	**0.34**	**3.53**	**4.04**	**5.55**	**4.10**

Source: Company's Response to OCA-1-3_St19_ACOSS Sch1&3-7.

Summary of Results of Company's Proposed ACOSS: Required Increase at Equalized Rates (Dollars in Thousands)

Line No.	Account Description	Total Company	Residential Service	Commercial and Public Authority Service: Extra Small (LE 250)	Commercial and Public Authority Service: Small (GT 250)	Commercial and Public Authority Service: Large	Natural Gas Vehicles (NGV)	Industrial Service: Small (SVIS)	Industrial Service: Intermediate (IVIS)	Industrial Service: Large (LVIS)	Industrial Service: Extra Large (LIS)
1	**Required Income Under Company's Proposed ROR**										
2	Total Gas Rate Base	$ 571,582	$ 446,527	$ 25,330	$ 27,719	$ 40,971	$ 974	$1,072	$ 16,029	$ 6,028	$ 6,930
3	Proposed Rate of Return	8.78%	8.78%	8.78%	8.78%	8.78%	8.78%	8.78%	8.78%	8.78%	8.78%
4	**Required Operating Income @ 8.78% ROR**	**$ 50,185**	**$ 39,205**	**$ 2,224**	**$ 2,434**	**$ 3,597**	**$ 85**	**$ 94**	**$ 1,407**	**$ 529**	**$ 608**
5	**Operating Expenses**										
6	O&M and A&G Expenses	$ 204,276	$ 166,814	$ 9,875	$ 11,296	$ 10,251	$ 473	$ 534	$ 3,589	$ 737	$ 708
7	Depreciation and Amortization Expense	25,074	19,895	1,156	1,266	1,581	42	51	610	226	249
8	Taxes Other than Income	2,490	1,992	125	131	139	3	6	53	19	21
9	State/Federal Income Taxes at Equalized ROR	(1,653)	(1,291)	(73)	(80)	(118)	(3)	(3)	(46)	(17)	(20)
10	Deferred Income Tax	(687)	(539)	(31)	(34)	(47)	(1)	(1)	(19)	(7)	(8)
11	Revenue Increase Related Expenses	5,520	4,364	238	256	375	9	11	149	55	63
12	**Total Operating Expenses**	$ 235,019	$ 191,235	$ 11,290	$ 12,835	$ 12,180	$ 523	$ 597	$ 4,336	$ 1,012	$ 1,012
13	**Total Revenue Requirement**	**$ 285,204**	**$ 230,440**	**$ 13,514**	**$ 15,268**	**$ 15,777**	**$ 608**	**$ 691**	**$ 5,743**	**$ 1,542**	**$ 1,621**
14	**Operating Revenues at Current Rates**										
15	Gas Service Revenue	$ 136,735	$ 97,367	$ 6,819	$ 6,989	$ 13,908	$ 131	$ 444	$ 5,876	$ 2,730	$ 2,470
16	Gas Cost	124,571	100,820	6,010	7,790	6,609	398	364	2,175	229	176
17	Other Revenues	4,219	3,512	173	191	195	7	9	76	26	29
18	Incremental Negotiated Contract Revenue	(68)	(55)	(3)	(4)	(4)	(0)	(0)	(1)	(0)	(0)
19	Incremental Late Payment Revenue	84	68	4	4	5	0	0	2	0	0
20	**Total Operating Revenues**	$ 265,539	$ 201,711	$ 13,003	$ 14,970	$ 20,713	$ 536	$ 817	$ 8,128	$ 2,986	$ 2,675
21	**Revenue Deficiency/(Surplus)**	**$ 19,665**	**$ 28,728**	**$ 511**	**$ 298**	**$ (4,936)**	**$ 72**	**$ (125)**	**$ (2,385)**	**$(1,444)**	**$ (1,054)**
22	**Rate Increase/(Decrease)**	**14.38%**	**29.51%**	**7.49%**	**4.27%**	**-35.49%**	**54.73%**	**-28.20%**	**-40.58%**	**-52.89%**	**-42.67%**
23	**Relative Rate Increase**	**1.00**	**2.05**	**0.52**	**0.30**	**-2.47**	**3.81**	**-1.96**	**-2.82**	**-3.68**	**-2.97**

Source: Company's Response to OCA-1-3_St19_ACOSS Sch1&3-7.

Correlation of Customers and Distribution Mains Additions (Annual Additions)

Year	Change in Average Number of Customers	Net Distribution Mains Additions
2014	-	4,985,742
2015	2,961	5,948,943
2016	1,556	9,332,893
2017	(516)	6,489,027
2018	1,039	8,213,274
2019	(1,988)	9,650,982
2020	3,948	10,959,713
2021	4,401	10,763,655
2022	569	9,127,399
2023	403	24,249,969
2024	(7)	26,774,909
Correlation Coefficient		**-0.2029**
P-Value		**0.5740**
Significant at 95% Level		**No Correlation**

Source: Company Annual Report

Correlation of Customers and Distribution Mains Additions (Growth Rate Analysis)

Year	Change in Average Number of Customers	Net Distribution Mains Additions
2014	-	15.42
2015	0.0164	15.60
2016	0.0085	16.05
2017	(0.0028)	15.69
2018	0.0057	15.92
2019	(0.0109)	16.08
2020	0.0215	16.21
2021	0.0234	16.19
2022	0.0030	16.03
2023	0.0021	17.00
2024	(0.0000)	17.10
Correlation Coefficient		**-0.1633**
P-Value		**0.6522**
Significant at 95% Level		**No Correlation**

Source: Company Annual Report

Summary of Results of ACOSS Using Seaboard Allocation: Relative Rate of Return at Current Rates (Dollars in Thousands)

Line No.	Account Description	Total Company	Residential Service	Commercial and Public Authority Service: Extra Small (LE 250)	Commercial and Public Authority Service: Small (GT 250)	Commercial and Public Authority Service: Large	Natural Gas Vehicles (NGV)	Industrial Service: Small (SVIS)	Industrial Service: Intermediate (IVIS)	Industrial Service: Large (LVIS)	Industrial Service: Extra Large (LIS)
1	**Rate Base**										
2	Plant in Service	$957,237	$ 620,130	$ 38,116	$ 58,155	$ 114,367	$ 2,111	$2,361	$ 52,986	$27,996	$ 41,016
3	Accumulated Reserve	(320,571)	(213,651)	(13,116)	(19,514)	(35,278)	(662)	(795)	(16,421)	(8,696)	(12,437)
4	Other Rate Base Items	(65,085)	(41,753)	(2,550)	(3,830)	(7,989)	(131)	(148)	(3,748)	(2,003)	(2,934)
5	**Total Gas Rate Base**	**$571,582**	**$ 364,726**	**$ 22,449**	**$ 34,812**	**$ 71,099**	**$ 1,318**	**$1,418**	**$ 32,817**	**$17,297**	**$ 25,646**
6	**Operating Income**										
7	**Operating Revenues at Current Rates**										
8	Gas Service Revenue	$136,735	$ 97,367	$ 6,819	$ 6,989	$ 13,908	$ 131	$ 444	$ 5,876	$ 2,730	$ 2,470
9	Gas Cost	124,571	100,820	6,010	7,790	6,609	398	364	2,175	229	176
10	Other Revenues	4,219	3,314	166	208	270	8	10	117	52	73
11	**Total Operating Revenues**	$265,524	$ 201,501	$ 12,996	$ 14,987	$ 20,787	$ 537	$ 817	$ 8,168	$ 3,012	$ 2,719
12	**Operating Expenses**										
13	O&M and A&G Expenses	$204,276	$ 159,636	$ 9,622	$ 11,961	$ 13,006	$ 509	$ 564	$ 5,055	$ 1,672	$ 2,250
14	Depreciation and Amortization Expense	25,074	16,758	1,045	1,543	2,752	56	64	1,252	650	953
15	Taxes Other than Income	2,490	1,689	114	159	256	5	7	116	59	86
16	Total Income Taxes	(2,340)	(1,594)	(136)	(107)	(316)	0	(11)	(124)	(51)	(2)
17	**Total Operating Expenses**	$229,499	$ 176,489	$ 10,645	$ 13,557	$ 15,697	$ 570	$ 625	$ 6,299	$ 2,331	$ 3,286
18	**Total Operating Income**	**$ 36,024**	**$ 25,012**	**$ 2,350**	**$ 1,430**	**$ 5,089**	**$ (32)**	**$ 192**	**$ 1,869**	**$ 681**	**$ (568)**
19	**Rate of Return on Rate Base ("ROR")**	**6.30%**	**6.86%**	**10.47%**	**4.11%**	**7.16%**	**-2.46%**	**13.56%**	**5.70%**	**3.94%**	**-2.21%**
20	**Relative Rate of Return ("RROR")**	**1.00**	**1.09**	**1.66**	**0.65**	**1.14**	**-0.39**	**2.15**	**0.90**	**0.63**	**-0.35**

Source: Company's Response to OCA-1-3_St19_ACOSS Sch1&3-7.

Summary of Results of ACOSS Using Seaboard Allocation: Required Increase at Equalized Rates (Dollars in Thousands)

Line No.	Account Description	Total Company	Residential Service	Commercial and Public Authority Service: Extra Small (LE 250)	Commercial and Public Authority Service: Small (GT 250)	Commercial and Public Authority Service: Large	Natural Gas Vehicles (NGV)	Industrial Service: Small (SVIS)	Industrial Service: Intermediate (IVIS)	Industrial Service: Large (LVIS)	Industrial Service: Extra Large (LIS)
1	**Required Income Under Company's Proposed ROR**										
2	Total Gas Rate Base	$ 571,582	$ 364,726	$ 22,449	$ 34,812	$ 71,099	$ 1,318	$1,418	$ 32,817	$17,297	$ 25,646
3	Proposed Rate of Return	8.78%	8.78%	8.78%	8.78%	8.78%	8.78%	8.78%	8.78%	8.78%	8.78%
4	**Required Operating Income @ 8.78% ROR**	**$ 50,185**	**$ 32,023**	**$ 1,971**	**$ 3,056**	**$ 6,242**	**$ 116**	**$ 124**	**$ 2,881**	**$ 1,519**	**$ 2,252**
5	**Operating Expenses**										
6	O&M and A&G Expenses	$ 204,276	$ 159,636	$ 9,622	$ 11,961	$ 13,006	$ 509	$ 564	$ 5,055	$ 1,672	$ 2,250
7	Depreciation and Amortization Expense	25,074	16,758	1,045	1,543	2,752	56	64	1,252	650	953
8	Taxes Other than Income	2,490	1,689	114	159	256	5	7	116	59	86
9	State/Federal Income Taxes at Equalized ROR	(1,653)	(1,055)	(65)	(101)	(206)	(4)	(4)	(95)	(50)	(74)
10	Deferred Income Tax	(687)	(445)	(27)	(42)	(82)	(2)	(2)	(38)	(20)	(29)
11	Revenue Increase Related Expenses	5,520	3,617	212	321	650	12	14	302	158	234
12	**Total Operating Expenses**	$ 235,019	$ 180,201	$ 10,901	$ 13,842	$ 16,376	$ 576	$ 644	$ 6,591	$ 2,470	$ 3,418
13	**Total Revenue Requirement**	**$ 285,204**	**$ 212,224**	**$ 12,872**	**$ 16,898**	**$ 22,618**	**$ 692**	**$ 769**	**$ 9,473**	**$ 3,988**	**$ 5,670**
14	**Operating Revenues at Current Rates**										
15	Gas Service Revenue	$ 136,735	$ 97,367	$ 6,819	$ 6,989	$ 13,908	$ 131	$ 444	$ 5,876	$ 2,730	$ 2,470
16	Gas Cost	124,571	100,820	6,010	7,790	6,609	398	364	2,175	229	176
17	Other Revenues	4,219	3,314	166	208	270	8	10	117	52	73
18	Incremental Negotiated Contract Revenue	(68)	(51)	(3)	(4)	(5)	(0)	(0)	(2)	(1)	(1)
19	Incremental Late Payment Revenue	84	62	4	5	7	0	0	3	1	2
20	**Total Operating Revenues**	$ 265,539	$ 201,513	$ 12,996	$ 14,988	$ 20,788	$ 537	$ 817	$ 8,168	$ 3,012	$ 2,719
21	**Revenue Deficiency/(Surplus)**	**$ 19,665**	**$ 10,711**	**$ (124)**	**$ 1,910**	**$ 1,830**	**$ 155**	**$ (49)**	**$ 1,304**	**$ 976**	**$ 2,951**
22	**Rate Increase/(Decrease)**	**14.38%**	**11.00%**	**-1.82%**	**27.34%**	**13.16%**	**117.91%**	**-10.98%**	**22.20%**	**35.75%**	**119.45%**
23	**Relative Rate Increase**	**1.00**	**0.76**	**-0.13**	**1.90**	**0.92**	**8.20**	**-0.76**	**1.54**	**2.49**	**8.31**

Source: Company's Response to OCA-1-3_St19_ACOSS Sch1&3-7.

Summary of Results of Alternative ACOSS: Relative Rate of Return at Current Rates (Dollars in Thousands)

Line No.	Account Description	Total Company	Residential Service	Commercial and Public Authority Service: Extra Small (LE 250)	Commercial and Public Authority Service: Small (GT 250)	Commercial and Public Authority Service: Large	Natural Gas Vehicles (NGV)	Industrial Service: Small (SVIS)	Industrial Service: Intermediate (IVIS)	Industrial Service: Large (LVIS)	Industrial Service: Extra Large (LIS)
1	**Rate Base**										
2	Plant in Service	$957,237	$ 633,592	$ 38,593	$ 59,750	$ 116,601	$ 2,445	$2,313	$ 49,758	$22,715	$ 31,470
3	Accumulated Reserve	(320,571)	(217,691)	(13,260)	(19,992)	(35,949)	(763)	(780)	(15,453)	(7,111)	(9,572)
4	Total Other Rate Base Items	(65,085)	(42,716)	(2,584)	(3,944)	(8,149)	(154)	(144)	(3,517)	(1,625)	(2,251)
5	**Total Gas Rate Base**	**$571,582**	**$ 373,185**	**$ 22,749**	**$ 35,814**	**$ 72,503**	**$ 1,528**	**$1,388**	**$ 30,789**	**$13,979**	**$ 19,647**
6	**Operating Income**										
7	**Operating Revenues at Current Rates**										
8	Gas Service Revenue	$136,735	$ 97,367	$ 6,819	$ 6,989	$ 13,908	$ 131	$ 444	$ 5,876	$ 2,730	$ 2,470
9	Gas Cost	124,571	100,820	6,010	7,790	6,609	398	364	2,175	229	176
10	Other Revenues	4,219	3,334	167	210	273	8	10	112	45	59
11	**Total Operating Revenues**	$265,524	$ 201,521	$ 12,996	$ 14,989	$ 20,790	$ 538	$ 817	$ 8,163	$ 3,004	$ 2,705
12	**Operating Expenses**										
13	O&M and A&G Expenses	$204,276	$ 160,301	$ 9,646	$ 12,039	$ 13,117	$ 525	$ 562	$ 4,896	$ 1,412	$ 1,779
14	Depreciation and Amortization Expense	25,074	17,072	1,056	1,581	2,804	64	63	1,177	527	730
15	Taxes Other than Income	2,490	1,717	115	163	260	5	7	109	48	66
16	Total Income Taxes	(2,340)	(1,556)	(135)	(102)	(310)	1	(11)	(133)	(66)	(29)
17	**Total Operating Expenses**	$229,499	$ 177,534	$ 10,682	$ 13,681	$ 15,871	$ 595	$ 621	$ 6,048	$ 1,921	$ 2,546
18	**Total Operating Income**	**$ 36,024**	**$ 23,987**	**$ 2,314**	**$ 1,309**	**$ 4,919**	**$ (58)**	**$ 196**	**$ 2,115**	**$ 1,084**	**$ 159**
19	**Rate of Return on Rate Base ("ROR")**	**6.30%**	**6.43%**	**10.17%**	**3.65%**	**6.78%**	**-3.79%**	**14.12%**	**6.87%**	**7.75%**	**0.81%**
20	**Relative Rate of Return ("RROR")**	**1.00**	**1.02**	**1.61**	**0.58**	**1.08**	**-0.60**	**2.24**	**1.09**	**1.23**	**0.13**

Source: Company's Response to OCA-1-3_St19_ACOSS Sch1&3-7.

Summary of Results of Alternative ACOSS: Required Increase at Equalized Rates (Dollars in Thousands)

Line No.	Account Description	Total Company	Residential Service	Commercial and Public Authority Service: Extra Small (LE 250)	Commercial and Public Authority Service: Small (GT 250)	Commercial and Public Authority Service: Large	Natural Gas Vehicles (NGV)	Industrial Service: Small (SVIS)	Industrial Service: Intermediate (IVIS)	Industrial Service: Large (LVIS)	Industrial Service: Extra Large (LIS)
1	**Required Income Under Company's Proposed ROR**										
2	Total Gas Rate Base	$ 571,582	$ 373,185	$ 22,749	$ 35,814	$ 72,503	$ 1,528	$ 1,388	$ 30,789	$ 13,979	$ 19,647
3	Proposed Rate of Return	8.78%	8.78%	8.78%	8.78%	8.78%	8.78%	8.78%	8.78%	8.78%	8.78%
4	**Required Operating Income @ 8.78% ROR**	**$ 50,185**	**$ 32,766**	**$ 1,997**	**$ 3,144**	**$ 6,366**	**$ 134**	**$ 122**	**$ 2,703**	**$ 1,227**	**$ 1,725**
5	**Operating Expenses**										
6	O&M and A&G Expenses	$ 204,276	$ 160,301	$ 9,646	$ 12,039	$ 13,117	$ 525	$ 562	$ 4,896	$ 1,412	$ 1,779
7	Depreciation and Amortization Expense	25,074	17,072	1,056	1,581	2,804	64	63	1,177	527	730
8	Taxes Other than Income	2,490	1,717	115	163	260	5	7	109	48	66
9	State/Federal Income Taxes at Equalized ROR	(1,653)	(1,079)	(66)	(104)	(210)	(4)	(4)	(89)	(40)	(57)
10	Deferred Income Tax	(687)	(455)	(28)	(43)	(84)	(2)	(2)	(36)	(16)	(23)
11	Revenue Increase Related Expenses	5,520	3,694	215	330	663	14	14	283	128	179
12	**Total Operating Expenses**	$ 235,019	$ 181,249	$ 10,938	$ 13,966	$ 16,550	$ 602	$ 640	$ 6,340	$ 2,058	$ 2,675
13	**Total Revenue Requirement**	**$ 285,204**	**$ 214,015**	**$ 12,936**	**$ 17,111**	**$ 22,916**	**$ 736**	**$ 762**	**$ 9,043**	**$ 3,285**	**$ 4,400**
14	**Operating Revenues at Current Rates**										
15	Gas Service Revenue	$ 136,735	$ 97,367	$ 6,819	$ 6,989	$ 13,908	$ 131	$ 444	$ 5,876	$ 2,730	$ 2,470
16	Gas Cost	124,571	100,820	6,010	7,790	6,609	398	364	2,175	229	176
17	Other Revenues	4,219	3,334	167	210	273	8	10	112	45	59
18	Incremental Negotiated Contract Revenue	(68)	(51)	(3)	(4)	(5)	(0)	(0)	(2)	(1)	(1)
19	Incremental Late Payment Revenue	84	63	4	5	7	0	0	3	1	1
20	**Total Operating Revenues**	$ 265,539	$ 201,532	$ 12,997	$ 14,990	$ 20,791	$ 538	$ 817	$ 8,164	$ 3,005	$ 2,705
21	**Revenue Deficiency/(Surplus)**	**$ 19,665**	**$ 12,483**	**$ (61)**	**$ 2,120**	**$ 2,124**	**$ 199**	**$ (55)**	**$ 880**	**$ 281**	**$ 1,694**
22	**Rate Increase/(Decrease)**	**14.38%**	**12.82%**	**-0.90%**	**30.34%**	**15.28%**	**151.43%**	**-12.40%**	**14.97%**	**10.29%**	**68.59%**
23	**Relative Rate Increase**	**1.00**	**0.89**	**-0.06**	**2.11**	**1.06**	**10.53**	**-0.86**	**1.04**	**0.72**	**4.77**

Source: Company's Response to OCA-1-3_St19_ACOSS Sch1&3-7.

Summary of Company's Proposed Revenue Allocation (Dollars in Thousands)

Witness: Deupree
Docket No. R-2025-3059428
Exhibit MWD-7

Line No.	Account Description	Total Company	Residential Service	Commercial and Public Authority Service: Extra Small (LE 250)	Commercial and Public Authority Service: Small (GT 250)	Commercial and Public Authority Service: Large	Natural Gas Vehicles (NGV)	Industrial Service: Small (SVIS)	Industrial Service: Intermediate (IVIS)	Industrial Service: Large (LVIS)	Industrial Service: Extra Large (LIS)
1	**Allocated Cost of Service Study Results**										
2	**Total Rate Base**	$571,582	$ 446,527	$ 25,330	$ 27,719	$ 40,971	$ 974	$ 1,072	$ 16,029	$ 6,028	$ 6,930
3	**Gas Operating Revenues**										
4	Gas Rate Revenues	$136,735	$ 97,367	$ 6,819	$ 6,989	$ 13,908	$ 131	$ 444	$ 5,876	$ 2,730	$ 2,470
5	Gas Costs	124,571	100,820	6,010	7,790	6,609	398	364	2,175	229	176
6	Other Operating Revenues	4,219	3,512	173	191	195	7	9	76	26	29
7	**Total Gas Operating Revenues**	$265,524	$ 201,699	$ 13,003	$ 14,969	$ 20,712	$ 536	$ 817	$ 8,127	$ 2,985	$ 2,675
8	**Total Gas Operating Expenses**	$229,499	$ 187,525	$ 11,034	$ 12,547	$ 11,495	$ 516	$ 578	$ 4,043	$ 876	$ 886
9	**Present Net Operating Income (for Ratemaking Purposes)**	$ 36,024	$ 14,174	$ 1,969	$ 2,422	$ 9,218	$ 21	$ 238	$ 4,084	$ 2,109	$ 1,789
10	**Rate of Return**	6.30%	3.17%	7.77%	8.74%	22.50%	2.12%	22.24%	25.48%	34.99%	25.82%
11	**Relative Rate of Return**	1.00	0.50	1.23	1.39	3.57	0.34	3.53	4.04	5.55	4.10
12	**Proposed Revenue Increase**										
13	**Proposed Revenue Increase**										
14	Current Gas Rate Revenues	$136,735									
15	Proposed Gas Operating Revenues	156,400									
16	**Proposed Revenue Increase**	$ 19,665									
17	**Revenue Increase at Equal Rate of Return**										
18	Current Non-Fuel Gas Operating Revenues	$140,953	$ 100,879	$ 6,993	$ 7,179	$ 14,103	$ 138	$ 453	$ 5,953	$ 2,756	$ 2,499
19	Revenue Increase at Equal Rates of Return	19,665	28,728	511	298	(4,936)	72	(125)	(2,385)	(1,444)	(1,054)
20	**Total Revenues at Equal Rates of Return**	$160,618	$ 129,607	$ 7,503	$ 7,478	$ 9,167	$ 210	$ 328	$ 3,568	$ 1,312	$ 1,445
21	**Current Revenue to Cost Ratio**	0.88	0.78	0.93	0.96	1.54	0.66	1.38	1.67	2.10	1.73
22	**Current Revenue Parity Ratio**	1.00	0.89	1.06	1.09	1.75	0.75	1.57	1.90	2.39	1.97
23	**Step One Mitigation**										
24	1.1 times System Average Increase for Under-Earning Classes	15.82%	15.82%	0.00%	0.00%	0.00%	15.82%	0.00%	0.00%	0.00%	0.00%
25	Total Step One Mitigation	$ 15,424	$ 15,403	$ -	$ -	$ -	$ 21	$ -	$ -	$ -	$ -
26	Revenue Remaining after Step One	$ 4,241									
27	**Step Two Mitigation**										
28	0.9 times System Average Increase for Classes between 1.0-1.5 Parity	12.94%	0.00%	12.94%	12.94%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
29	Revenue Increase	$ 1,787	$ -	$ 883	$ 905	$ -	$ -	$ -	$ -	$ -	$ -
30	Revenue Remaining after Step Two	$ 2,453									
31	**Step Three Mitigation**										
32	0.67 times System Average Increase for Classes above 1.5 Parity	9.65%	0.00%	0.00%	0.00%	9.65%	0.00%	9.65%	9.65%	9.65%	9.65%
33	Revenue Increase	$ 2,454	$ -	$ -	$ -	$ 1,342	$ -	$ 43	$ 567	$ 263	$ 238
34	**Proposed Revenues Increase by Class**	$ 19,665	$ 15,403	$ 883	$ 905	$ 1,342	$ 21	$ 43	$ 567	$ 263	$ 238
35	Current Gas Revenues	$136,735	$ 97,367	$ 6,819	$ 6,989	$ 13,908	$ 131	$ 444	$ 5,876	$ 2,730	$ 2,470
36	Proposed Revenue Increase	19,665	15,403	883	905	1,342	21	43	567	263	238
37	**Proposed Gas Rate Revenue**	$156,400	$ 112,770	$ 7,702	$ 7,893	$ 15,250	$ 152	$ 487	$ 6,443	$ 2,994	$ 2,709
38	**Proposed Revenue Change**	14.38%	15.82%	12.94%	12.94%	9.65%	15.82%	9.65%	9.65%	9.65%	9.65%
39	**Relative Proposed Rate Increase**	1.00	1.10	0.90	0.90	0.67	1.10	0.67	0.67	0.67	0.67

Source: Company's Response to OCA-1-3_St19_ACOSS Sch1&3-7.

Summary of Results of Alternative Revenue Allocation (Dollars in Thousands)

Witness: Deupree
Docket No. R-2025-3059428
Exhibit MWD-8

Line No.	Account Description	Total Company	Residential Service	Commercial and Public Authority Service: Extra Small (LE 250)	Commercial and Public Authority Service: Small (GT 250)	Commercial and Public Authority Service: Large	Natural Gas Vehicles (NGV)	Industrial Service: Small (SVIS)	Industrial Service: Intermediate (IVIS)	Industrial Service: Large (LVIS)	Industrial Service: Extra Large (LIS)
1	**Allocated Cost of Service Study Results**										
2	**Total Rate Base**	**$571,582**	**$ 373,185**	**$ 22,749**	**$ 35,814**	**$ 72,503**	**$ 1,528**	**$ 1,388**	**$ 30,789**	**$ 13,979**	**$ 19,647**
3	**Gas Operating Revenues**										
4	Gas Rate Revenues	$136,735	$ 97,367	$ 6,819	$ 6,989	$ 13,908	$ 131	$ 444	$ 5,876	$ 2,730	$ 2,470
5	Gas Costs	124,571	100,820	6,010	7,790	6,609	398	364	2,175	229	176
6	Other Operating Revenues	4,219	3,334	167	210	273	8	10	112	45	59
7	**Total Gas Operating Revenues**	**$265,524**	**$ 201,521**	**$ 12,996**	**$ 14,989**	**$ 20,790**	**$ 538**	**$ 817**	**$ 8,163**	**$ 3,004**	**$ 2,705**
8	**Total Gas Operating Expenses**	**$229,499**	**$ 177,534**	**$ 10,682**	**$ 13,681**	**$ 15,871**	**$ 595**	**$ 621**	**$ 6,048**	**$ 1,921**	**$ 2,546**
9	**Present Net Operating Income (for Ratemaking Purposes)**	**$ 36,024**	**$ 23,987**	**$ 2,314**	**$ 1,309**	**$ 4,919**	**$ (58)**	**$ 196**	**$ 2,115**	**$ 1,084**	**$ 159**
10	**Rate of Return**	**6.30%**	**6.43%**	**10.17%**	**3.65%**	**6.78%**	**-3.79%**	**14.12%**	**6.87%**	**7.75%**	**0.81%**
11	**Relative Rate of Return**	**1.00**	**1.02**	**1.61**	**0.58**	**1.08**	**-0.60**	**2.24**	**1.09**	**1.23**	**0.13**
12	**Proposed Revenue Increase**										
13	**Proposed Revenue Increase**										
14	Current Gas Rate Revenues	$136,735									
15	Proposed Gas Operating Revenues	156,400									
16	**Proposed Revenue Increase**	**$ 19,665**									
17	**Revenue Increase at Equal Rate of Return**										
18	Current Non-Fuel Gas Operating Revenues	$140,953	$ 100,701	$ 6,987	$ 7,199	$ 14,180	$ 140	$ 454	$ 5,988	$ 2,775	$ 2,530
19	Revenue Increase at Equal Rates of Return	19,665	12,483	(61)	2,120	2,124	199	(55)	880	281	1,694
20	**Total Revenues at Equal Rates of Return**	**$160,618**	**$ 113,183**	**$ 6,925**	**$ 9,320**	**$ 16,305**	**$ 338**	**$ 399**	**$ 6,868**	**$ 3,056**	**$ 4,224**
21	**Current Revenue to Cost Ratio**	**0.88**	**0.89**	**1.01**	**0.77**	**0.87**	**0.41**	**1.14**	**0.87**	**0.91**	**0.60**
22	**Current Revenue Parity Ratio**	**1.00**	**1.01**	**1.15**	**0.88**	**0.99**	**0.47**	**1.30**	**0.99**	**1.03**	**0.68**
23	**Step One Mitigation**										
24	1.15 times System Average Increase for Classes below 0.95 Parity	16.54%	0.00%	0.00%	16.54%	0.00%	16.54%	0.00%	0.00%	0.00%	16.54%
25	Total Step One Mitigation	$ 1,586	$ -	$ -	$ 1,156	$ -	$ 22	$ -	$ -	$ -	$ 409
26	Revenue Remaining after Step One	$ 18,079									
27	**Step Two Mitigation**										
28	System Average Increase for Classes between 0.95-1.05 Parity	14.34%	14.34%	0.00%	0.00%	14.34%	0.00%	0.00%	14.34%	14.34%	0.00%
29	Revenue Increase	$ 17,191	$ 13,963	$ -	$ -	$ 1,994	$ -	$ -	$ 843	$ 392	$ -
30	Revenue Remaining after Step Two	$ 888									
31	**Step Three Mitigation**										
32	0.85 times System Average Increase for Classes above 1.05 Parity	12.22%	0.00%	12.22%	0.00%	0.00%	0.00%	12.22%	0.00%	0.00%	0.00%
33	Revenue Increase	$ 888	$ -	$ 834	$ -	$ -	$ -	$ 54	$ -	$ -	$ -
34	**Proposed Revenues Increase by Class**	**$ 19,665**	**$ 13,963**	**$ 834**	**$ 1,156**	**$ 1,994**	**$ 22**	**$ 54**	**$ 843**	**$ 392**	**$ 409**
35	Current Gas Revenues	$136,735	$ 97,367	$ 6,819	$ 6,989	$ 13,908	$ 131	$ 444	$ 5,876	$ 2,730	$ 2,470
36	Proposed Revenue Increase	19,665	13,963	834	1,156	1,994	22	54	843	392	409
37	**Proposed Gas Rate Revenue**	**$156,400**	**$ 111,330**	**$ 7,653**	**$ 8,145**	**$ 15,902**	**$ 153**	**$ 498**	**$ 6,719**	**$ 3,122**	**$ 2,879**
38	**Proposed Revenue Change**	**14.38%**	**14.34%**	**12.22%**	**16.54%**	**14.34%**	**16.54%**	**12.22%**	**14.34%**	**14.34%**	**16.54%**
39	**Relative Proposed Rate Increase**	**1.00**	**1.00**	**0.85**	**1.15**	**1.00**	**1.15**	**0.85**	**1.00**	**1.00**	**1.15**

Source: Company's Response to OCA-1-3_St19_ACOSS Sch1&3-7.

Analysis of Customer-Related Costs
(Dollars in Thousands)

Witness: Deupree
Docket No. R-2025-3059428
Exhibit MWD-9

Line No.	Account Description	Residential Service (RS)	Commercial Service Small (LE 250)	Commercial Service Small (GT 250)
1	**Customer-Related Costs per Company's ACOSS**			
2	**Return on Customer-Related Rate Base**			
3	380 - Services	$ 226,753	$ 10,362	$ 5,135
4	381 - Meters	13,227	1,592	2,226
5	382 - Meter Installations	2,656	320	447
6	384 - House Regulatory Installations	923	111	155
7	Total Customer-Related Plant in Service	$ 243,559	$ 12,385	$ 7,964
8	System Average Return on Rate base	6.30%	6.30%	6.30%
9	Before Tax Return on Customer-Related Rate Base	$ 15,351	$ 781	$ 502
10	Tax Gross-up Factor	1.3984	1.3984	1.3984
11	**After Tax Return on Customer-Related Rate Base**	**$ 21,466**	**$ 1,092**	**$ 702**
12	**Customer-Related Expenses**			
13	874 - Mains and Services Expenses	$ 3,708	$ 192	$ 144
14	878 - Meters and House Regulator Expenses	710	85	119
15	879 - Customer Installation Expenses	1,042	55	23
16	892 - Maintenance of Services	285	13	6
17	893 - Maintenance of Meters and House Regulators	341	41	57
18	901-905 - Customer Account Expenses	14,814	689	292
19	906-910 - Customer Service and Information Expenses	4,228	224	95
20	913 - Advertising Expenses	3	0	0
21	**Total Customer-Related O&M Expenses**	**$ 25,130**	**$ 1,300**	**$ 739**
22	**Customer-Related Depreciation Expense**			
23	Total Distribution Plant in Service	$ 617,313	$ 34,305	$ 34,723
24	Total Customer-Related Plant in Service	243,559	12,385	7,964
25	Percent Customer-Related	39.5%	36.1%	22.9%
26	Total Distribution Depreciation Expense	$ 18,473	$ 1,072	$ 1,158
27	Percent Customer-Related	39.5%	36.1%	22.9%
28	**Customer-Related Depreciation Expense**	**$ 7,288**	**$ 387**	**$ 266**
29	**Total Class Functionalized Customer-Related Costs**	**$ 53,885**	**$ 2,779**	**$ 1,707**
30	Number of Customers	197,825	10,491	4,453
31	**Monthly Customer-Related Costs/Customer**	**$ 22.70**	**$ 22.07**	**$ 31.94**
32	**Current Monthly Customer Charge/Customer**	**$ 14.00**	**$ 27.00**	**$ 37.00**
33	**Relationship of Customer Charge Revenues to Customer-Related Costs**	**61.7%**	**122.3%**	**115.9%**

Source: Company's Response to OCA-1-3_St19_ACOSS Sch1&3-7.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission

v. Docket No. R-2025-3059428

National Fuel Gas Distribution Corp.

:

VERIFICATION

I, Michael Deupree, hereby state that the facts above set forth in my Direct Testimony, OCA Statement 4, are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

DATED: April 16, 2026

Signature: Michael Deupree
Michael Deupree

Address: 5800 One Perkins Place
Suite 5F
Baton Rouge, Louisiana 70808

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	Docket No.: R-2025-3059428
v.	:	
	:	
National Fuel Gas Distribution Company	:	

REBUTTAL TESTIMONY

OF

MICHAEL DEUPREE ON BEHALF OF THE PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

May 12, 2026

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Michael W. Deupree. My business address is 5800 One Perkins Place Drive, Suite 5-F, Baton Rouge, Louisiana, 70808.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

A. Yes. I filed direct testimony in this proceeding on April 16, 2026, on behalf of the Pennsylvania Office of Consumer Advocate ("OCA").

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my rebuttal testimony is to respond to elements of the direct testimony of Jennifer Warabak on behalf of the Pennsylvania Weatherization Providers Task Force ("PWPTF"), Justin B. Farr on behalf of the Pennsylvania Office of Small Business Advocate ("OSBA"), and Ethan H. Cline on behalf of the Bureau of Investigation and Enforcement ("I&E"). Specifically, I will respond to PWPTF's recommendation that low-income usage reduction program ("LIURP") funding be increased commensurate with the percentage increase in rates for residential customers in this proceeding, as well as OSBA and I&E's testimony concerning National Fuel Gas Distribution Company's ("NFG" or the "Company") proposed allocated cost of service study ("ACOSS") and revenue allocation.

II. LIURP FUNDING

Q. WHAT IS PWPTF'S POSITION ON THE PROPOSED RESIDENTIAL RATE INCREASE?

A. PWPTF is generally concerned with the Company's proposed increase in residential rates in the current proceeding, particularly the Company's 35 percent increase in fixed monthly

customer charges.[1] PWPTF notes that increases in fixed customer charges discourages conservation by reducing the ability of customers to control monthly utility bills through reducing consumption and thus conserving energy.[2] PWPTF argues that these rate increases particularly impact low-income households, especially in the current economic climate that is characterized by high rates of inflation across multiple sectors.[3]

Q. DO YOU SHARE PWPTF'S CONCERNS REGARDING THE CURRENT MACROECONOMIC CONDITIONS FACING PENNSYLVANIA RATE PAYERS?

A. Yes. As I discussed in detail in my direct testimony, the Pennsylvania Public Utility Commission ("Commission") should take into consideration the current macroeconomic conditions, including consumer affordability concerns, when determining just and reasonable rates for the Company.[4] Average Pennsylvanians are still struggling with lingering inflation concerns besides looking at potential additional concerns placed on them due to the current conflict in the Persian Gulf.[5] This is while NFG's parent company has seen increasing stock prices for its shareholders and no obvious market distress.[6] As noted by PWPTF, inflation disproportionately impacts low-income households and households that are on a fixed income, negatively affecting energy affordability for these communities.[7]

[1] Direct Testimony of Jennifer Warabak, PWPTF Statement 1 at 4:7-9.
[2] Direct Testimony of Jennifer Warabak, PWPTF Statement 1 at 4:10-15.
[3] Direct Testimony of Jennifer Warabak, PWPTF Statement 1 at 4:15 to 5:1.
[4] *See*, Direct Testimony of Michael W. Deupree, OCA Statement 1 at 18:14-16.
[5] *See*, Direct Testimony of Michael W. Deupree, OCA Statement 1 at 8:17 to 17:19.
[6] Direct Testimony of Michael W. Deupree, OCA Statement 1 at 18:4-11; National Fuel, the Company's parent entity, has seen its stock price trending upward for several years, and on March 13, 2026, National Fuel's stock price reached an all-time high of $96.30 per share. While National Fuel's stock price has declined since its March 13, 2026, high, as of May 7, 2026, National Fuel still closed at a price of $80.22 per share; this current share price is consistent with where National Fuel traded at the beginning of 2026, and one-year ago in May 2025.
[7] *See,* Direct Testimony of Jennifer Warabak, PWPTF Statement 1 at 5:8-14.

Q. HOW DO YOU DEFINE ENERGY AFFORDABILITY?

A. Energy affordability reflects a fundamental household value proposition: it defines how expensive energy is relative to a household's income. Affordability, more generally, can be utilized as an index number to measure, among other things, the ability of a specific type of household to pay for essential utility services such as water, electric, and/or natural gas.

Q. ARE THERE ANY THRESHOLDS AT WHICH ENERGY SIMPLY BECOMES "UNAFFORDABLE" OR "BURDENSOME?"

A. There is no universal definition of "unaffordability;" however, the most accepted and utilized threshold at which a customer's utility, and thus energy, bills reach a level of significant burden is when the percentage of income spent on energy exceeds six percent.[8] This threshold comes from the Fisher, Sheehan, and Colton's *Home Energy Affordability Gap Study* from 2011. The threshold is based on the premise that total shelter costs (including rent/mortgage and all utilities) should not exceed 30 percent of income, and that 20 percent of shelter costs should be allocated to energy bills. Thus, 20 percent of 30 percent yields a six percent affordable utility burden.[9]

Q. HAS THE COMMISSION ESTABLISHED MAXIMUM ENERGY BURDEN LEVELS FOR PENNSYLVANIA RATEPAYERS?

A. Yes. The Commission examined home energy burdens for low-income Pennsylvanians in its *Home Energy Affordability* 2019 report,[10] and subsequently issued a policy statement on March 21, 2020, establishing maximum energy burdens for customers.[11] Specifically, the Commission

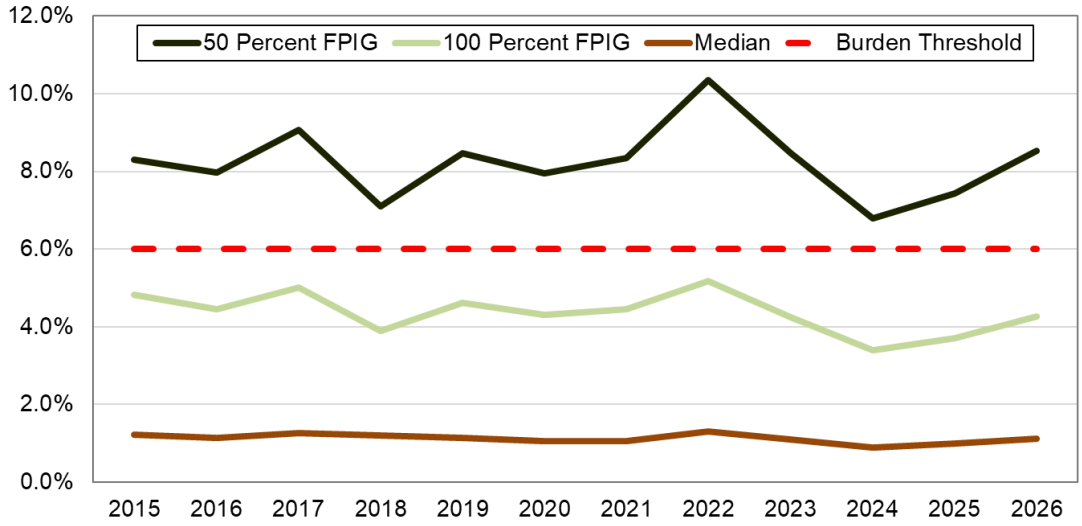
[8] *See, Understanding Energy Affordability* ACEEE, 2015, page 2.
[9] Fisher, Sheehan, and Colton. *Home Energy Affordability in New York: The Affordability Gap 2008-2010*, June 2011, page 2.
[10] *Home Energy Affordability for Low-Income Customers in Pennsylvania*, (January 2019) Pennsylvania Public Utility Commission.
[11] 52 Pa. Code Ch. 69.

established a maximum energy burden of six percent for natural gas heating customers with annual household incomes earning at least 50 percent of the Federal Poverty Income Guidelines ("FPIG").[12]

Q. HAVE YOU ESTIMATED THE EFFECT THE COMPANY'S PROPOSED RATE INCREASE WOULD HAVE ON THE AFFORDABILITY OF ENERGY IN PENNSYLVANIA?

A. Yes. As shown in Figure 1 below, I calculated the energy affordability index by income level to offer a comprehensive assessment of energy affordability in Pennsylvania. The index does not take rent into account and was calculated for two low-income residential customer groups: 50 percent of the FPIG and 100 percent of the FPIG, as well as for median income households.

Figure 1: Energy Affordability Index by Income Level (before Inclusion of Rent Expenses)



[12] 52 Pa. Code Ch. 69, at 1661.

Q. WHAT ARE THE RESULTS OF THE ENERGY AFFORDABILITY INDEX THAT MEASURE THE ENERGY BURDEN OF LOW-INCOME HOUSEHOLDS WITHOUT FACTORING IN RENT?

A. In 2024, the energy affordability index for low-income households at 50 percent of the FPIG had an energy burden of 6.8 percent, while households earning 100 percent of the FPIG had an energy burden of 3.4 percent. With the Company's proposed rate increase, the energy affordability index will increase to 8.5 percent in 2026 for residential customers earning 50 percent of the FPIG and increase to 4.3 percent for residential customers earning 100 percent of the FPIG. Both existing energy burdens as of 2024 and estimated energy burdens in 2026 will be greater than the six percent "unaffordable" threshold established in 52 Pa. Code Chapter 69 for customers earning 50 percent of the FPIG and will be nearly unaffordable for customers earning 100 percent of the FPIG. This means that low-income households will experience increasingly unaffordable utility services, something the Commission needs to take into consideration when evaluating the Company's proposed rate increase.

Q. WHAT IS YOUR CONCLUSION FROM A REVIEW OF ENERGY BURDEN IN THE COMPANY'S SERVICE TERRITORY?

A. Low-income customers in the Company's service territory increasingly face high energy burdens, and the Company's proposed rate increase will not improve this negative situation. Specifically, energy burdens for low-income households in the Company's service territory will remain above the six percent threshold through 2026, after the Company's proposed rate increase. The Commission must consider the effect of the proposed rate increase on the Company's most vulnerable customers, who are struggling to afford their monthly utility bills.

Q. DO YOU AGREE WITH PWPTF'S CONCERN THAT INCREASES IN THE RESIDENTIAL CUSTOMER CHARGE WILL NEGATIVELY IMPACT ENERGY EFFICIENCY AND LOW-INCOME HOUSEHOLDS?

A. Yes, and I discussed these concerns at length in my direct testimony.[13] The PWPTF is especially concerned with the increased burden the Company's proposed increase in the current residential customer charge will have on the Company's LIURP, without any proposed increase in LIURP funding.[14] The PWPTF recommends that annual LIURP funding be increased at least commensurate with the percentage increase in rates for residential customers that result from this proceeding.[15]

Q. DO YOU AGREE THAT THE COMPANY'S PROPOSED INCREASE IN THE RESIDENTIAL CUSTOMER CHARGE WILL LIKELY IMPACT LIURP PARTICIPATION?

A. Yes. However, the Commission should recognize that PWPTF's proposal to increase LIURP funding to keep up with the proposed increase in residential rates represents a second-best solution. If the Commission were to accept lower increase in residential rates, including maintaining the existing residential customer charge rather than accepting the increase in charge requested by the Company, concerns regarding LIURP funding would be mitigated, if not completely resolved.

[13] Direct Testimony of Michael W. Deupree, OCA Statement 1 at 71:13 to 75:11.
[14] Direct Testimony of Jennifer Warabak, PWPTF Statement 1 at 6:6-8.
[15] Direct Testimony of Jennifer Warabak, PWPTF Statement 1 at 7:4-6.

III. ALLOCATED COST OF SERVICE AND REVENUE ALLOCATION

Q. PLEASE SUMMARIZE INTERVENING PARTIES' DIRECT TESTIMONY RELATED TO THE COMPANY'S PROPOSED ACOSS.

A. Intervening parties in their direct testimony primarily focused on the Company's proposed classification of costs associated with distribution mains as both demand and customer-related, due to the importance of these costs in establishing relative revenue allocations. OSBA overall found the Company's ACOSS to conform to cost causation principles and therefore did not recommend any changes.[16] I&E, on the other hand, disagreed with the Company's cost allocation methodology for costs associated with distribution mains on the basis of both demand and customer-related aspects and argued that the Company's proposal was inconsistent with long-standing Commission precedent most recently reaffirmed in the Commission's Order involving Columbia Gas of Pennsylvania, Inc.[17] Specifically, I&E referenced the Commission's finding that, although distribution mains serve customers, it is throughput that determines the type of distribution main investment, and that, therefore, it is not reasonable to allocate costs associated with distribution mains investments on either a customer-demand basis or a 100 percent demand basis.[18]

Q. WHAT IS YOUR RESPONSE TO INTERVENING PARTIES ON THE APPROPRIATE CLASSIFICATION OF COSTS ASSOCIATED WITH DISTRIBUTION MAINS INVESTMENTS WITHIN THE COMPANY'S ACOSS?

A. As I stated in my direct testimony, the Company's classification of costs associated with distribution mains investments as both customer and demand-related are based on a fundamentally

[16] Direct Testimony of Justin B. Farr, OSBA Statement 1 at 16:3-5.
[17] Direct Testimony of Ethan H. Cline, I&E Statement 3 at 9:13-15.
[18] Direct Testimony of Ethan H. Cline, I&E Statement 3 at 9:16 to 10:16, *citing,* Pa. PUC v. Columbia Gas of Pennsylvania, Inc., Docket No. R-2025-3053499, pp. 254-255.

flawed zero-intercept study ("ZIS").[19] A ZIS, and the related minimum system study, attempt to estimate the costs associated with a zero-diameter distribution main, a hypothetical construct that does not, and indeed could not, exist in the real world.[20] Furthermore, these approaches have been criticized in academic literature for decades as being untethered to empirical studies that have failed to establish a causal relationship between distribution system costs and the number of utility customers.[21] Professor Bonbright, in his seminal text on public utility rates ultimately found that attempting to classify costs associated with a minimum-sized distribution system as customer-related is something that is "clearly indefensible."[22]

Q. HAVE YOU EXAMINED THE POTENTIAL EMPIRICAL RELATIONSHIP BETWEEN HISTORICAL COMPANY INVESTMENTS IN DISTRIBUTION MAINS AND CHANGES IN THE COMPANY'S AVERAGE NUMBER OF CUSTOMERS?

A. As discussed in my direct testimony, I have examined trends in changes in the average number of customers taking service on the Company's system with Company net investments in distribution mains over the ten-year period 2014 through 2024. Consistent with past criticism in the academic literature, I find no statistical correlation between changes in the Company's historic net investment in distribution mains and changes in its average number of customers.[23] Likewise, this result is consistent with the understanding that significant portion of the Company's annual investment in distribution mains are associated with non-growth activities covered by the Company's distribution system improvement charge ("DISC").[24] Overall, the premise that

[19] Direct Testimony of Michael W. Deupree, OCA Statement 1 at 51:4 to 56:3.
[20] Direct Testimony of Michael W. Deupree, OCA Statement 1 at 52:13-17.
[21] Direct Testimony of Michael W. Deupree, OCA Statement 1 at 53:1-7.
[22] Direct Testimony of Michael W. Deupree, OCA Statement 1 at 54:13-16.
[23] Direct Testimony of Michael W. Deupree, OCA Statement 1 at 55:9-17, and Exhibit MWD-4.
[24] Direct Testimony of Michael W. Deupree, OCA Statement 1 at 55:19 to 56:3.

changes in the Company's customer count are a significant driver of distribution mains investment is outdated and unsupported by empirical evidence.

Q. DO YOU FURTHERMORE AGREE WITH THE INCLUSION OF A THROUGHPUT COMPONENT IN THE ALLOCATION OF COSTS ASSOCIATED WITH DISTRIBUTION MAINS?

A. Yes. As the Federal Power Commission (the predecessor agency to the Federal Energy Regulatory Commission) noted in its 1952 decision involving the Atlantic Seaboard Corporation, pipelines are not built to supply service on peak days only but instead supply service on all days throughout the year.[25] Failure to recognize this fact results in an under-allocation of pipeline costs to customers that predominantly utilize the natural gas system during off-peak periods such as large volume industrial customers on interruptible rates.[26] It is therefore appropriate to include a throughput component when allocating costs associated with distribution mains.

Q. PLEASE SUMMARIZE THE INTERVENING PARTIES' DIRECT TESTIMONY RELATED TO THE COMPANY'S PROPOSED REVENUE ALLOCATION.

A. OSBA finds that the Company's proposed revenue allocation proposal to reasonably balance moving class revenue recovery in the direction of cost causation while adhering to the principles of gradualism.[27] I&E, on the other hand, argues that the Company's proposed revenue allocation is based on the results of a flawed ACOSS, and therefore is itself flawed.[28] I&E, also appears to take issue with the Company's proposal to cap revenue increases at 1.10 times the system average, proposing this cap to be increased to 1.50 times the system average.[29]

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[25] Direct Testimony of Michael W. Deupree, OCA Statement 1 at 57:12-24, *citing,* Re Atlantic Seaboard Corporation and Virginia Gas Transmission Corporation, Federal Power Commission Docket No. 11. F.P.C. 43.
[26] Re Atlantic Seaboard Corporation and Virginia Gas Transmission Corporation, Federal Power Commission Docket No. 11. F.P.C. 43.
[27] Direct Testimony of Justin B. Farr, OSBA Statement 1 at 17:1-4.
[28] Direct Testimony of Ethan H. Cline, I&E Statement 3 at 11:4-8.
[29] Direct Testimony of Ethan H. Cline, I&E Statement 3 at 12:8 to 13:2.

Q. WHAT IS YOUR RESPONSE TO INTERVENING PARTIES ON THE APPROPRIATE CLASSIFICATION OF COSTS ASSOCIATED WITH THE COMPANY'S PROPOSED REVENUE ALLOCATION?

A. As discussed in my direct testimony, the Company's proposed revenue allocation suffers from two major deficiencies.[30] First, the Company's proposal is based on the results of a faulty ACOSS that overstates the current rate of return the Company derives from its large commercial and industrial service customers while understating the rate of return the Company derives from its residential service customers. Second, the Company's proposed revenue apportionment process results in rate increases that are inconsistent with rate gradualism. Specifically, the Company's proposed revenue allocation process fails to recognize that ACOSS results may not fully reflect the relative cost of providing service after the conclusion of the rate case proceeding.

Q. DO OSBA AND I&E'S PROPOSED REVENUE ALLOCATIONS ADDRESS THESE DEFICIENCIES?

A. No. OSBA's finding that the Company's proposed revenue allocation reasonably balances moving class revenue recovery in the direction of cost causation while adhering to the principles of gradualism fails to recognize that the Company's proposed revenue allocation is based on the results of a faulty ACOSS that overstates the current rate of return the Company derives from its large commercial and industrial service customers, while understating the rate of return the Company derives from its residential service customers. I&E's proposed revenue allocation, while correctly recognizing that the Company's ACOSS is based on a flawed customer-demand cost allocation methodology for distribution mains, proposes to increase the Company's proposed cap

[30] Direct Testimony of Michael W. Deupree, OCA Statement 1 at 65:13-20.

on revenue increases to 1.50 times the system average, which is inconsistent with the concept of gradualism.

Q. WHAT IS YOUR RECOMMENDED REVENUE APPORTIONMENT?

A. As stated in my direct testimony, I recommend the Commission adopt a more reasonable revenue apportionment method based on the results of my alternative ACOSS.[31] I also recommend the Commission apply a +/- 0.05 error range to cost parity ratio estimates such that all classes within the range 0.95 to 1.05 are consider to be at full cost parity.[32] Lastly, I find that the Commission should cap the allowed revenue increase to under-earning rate classes to no more than 1.15 times the system average increase.[33] Capping the allowed revenue increase to under-earning rate classes to no more than 1.15 times the system average would align the proposed revenue allocation with the concept of gradualism when compared to I&E's proposed cap equal to 1.50 times the system average.

IV. CONCLUSIONS AND RECOMMENDATIONS

Q. PLEASE SUMMARIZE YOUR REBUTTAL TESTIMONY.

A. Having reviewed the direct testimony filed by the other non-company parties in this proceeding; I continue to recommend the Commission:

- Require some level of shared burden in light of recent macroeconomic challenges, balancing consumer affordability concerns with the financial interests of the Company.
- Reject the Company's proposed ZIS approach to allocate costs associated with distribution mains within the Company's ACOSS. ZIS and related minimum system study that are used to classify distribution mains investments are fundamentally flawed and provide little to no value in setting just and reasonable rates. In the alternative I recommend that the Commission approve an alternative classification of distribution mains that incorporates a

[31] Direct Testimony of Michael W. Deupree, OCA Statement 1 at 66:3-10.
[32] Direct Testimony of Michael W. Deupree, OCA Statement 1 at 64:17 to 65:2.
[33] Direct Testimony of Michael W. Deupree, OCA Statement 1 at 66:3-10.

P&A cost allocation method using weights based on the Company's test year system load factor.

- Adopt a more reasonable revenue apportionment method based on my alternative ACOSS results that also limits the rate increase compared to the Company's proposed revenue allocation method. First, I recommend that classes with current relative cost parity ratios below 0.95 receive a rate increase equal to 1.15 times the system average increase. Second, I recommend that classes with current relative cost parity ratios greater than 1.05 receive a rate increase equal to 0.85 times the system average increase. Finally, I recommend that the remaining rate increase be equally allocated to remaining rate classes with current relative cost parity ratios of between 0.95 and 1.05.

- Reject the Company's proposed increase in residential and commercial customer charges. An analysis of customer-related costs finds that residential rate classes are currently recovering a majority of customer-related costs through monthly customer charges. The proposal would also negatively impact the public policy goals of energy efficiency and would burden low-use customers with a greater than average portion of any proposed increase in the case. The Commission should keep the Company's current customer charges for all customers. If the Commission decides in the alternative that an increase in monthly customer charges is warranted, these increases should be limited to the percentage increase in class revenue requirement. This would furthermore be subject to scalebacks to reflect changes in allocated class revenue increases pursuant to Commission Orders.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3059428
	:	
National Fuel Gas Distribution Company	:	

VERIFICATION

I, Michael Deupree, hereby state that the facts above set forth in my Rebuttal Testimony, OCA Statement 1R, are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

DATED: May 12, 2026

Signature: /s/ Michael Deupree
Michael Deupree

Address: 5800 One Perkins Place
Suite 5F
Baton Rouge, Louisiana 70808

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	Docket No.: R-2025-3059428
v.	:	
	:	
National Fuel Gas Distribution Company	:	

SURREBUTTAL TESTIMONY

OF

MICHAEL DEUPREE ON BEHALF OF THE PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

May 27, 2026

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Michael W. Deupree. My business address is 5800 One Perkins Place Drive, Suite 5-F, Baton Rouge, Louisiana, 70808.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?

A. Yes. I filed direct testimony in this proceeding on April 16, 2026, and rebuttal testimony on May 12, 2026, on behalf of the Pennsylvania Office of Consumer Advocate ("OCA").

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. The purpose of my surrebuttal testimony is to respond to elements of the rebuttal testimony of Rebecca E. Hillery, Cathryn E. Hilliard, John D. Taylor, and Erik M. Solomon on behalf of National Fuel Gas Distribution Company ("NFG" or the "Company"), and Justin B. Farr on behalf of the Pennsylvania Office of Small Business Advocate ("OSBA"). Specifically, I will respond to NFG's discussion of macroeconomic issues, as well as issues concerning its proposed allocated cost of service study ("ACOSS") and rate design. I will also address OSBA's new hybrid allocation approach to allocating NFG costs related to distribution mains for ACOSS purposes that was discussed in OSBA's rebuttal filing.

II. MACROECONOMIC ISSUES

Q. PLEASE SUMMARIZE NFG'S STATEMENT RESPONDING TO YOUR DISCUSSION OF MACROECONOMIC ISSUES IN ITS REBUTTAL TESTIMONY.

A. NFG states that it is not appropriate to compare the increase requested in this case to NFG's parent company's stock price since jurisdictional ratemaking must be based on utility-specific

risk.[1] Specifically, the Company argues that NFG's parent company's stock price is materially influenced by perceived risk and performance of non-Pennsylvania and non-regulated operations.[2]

Q. DID YOU ARGUE IN YOUR DIRECT TESTIMONY THAT THE COMPANY'S REQUESTED RATE INCREASE SHOULD BE DIRECTLY COMPARED AGAINST NFG'S PARENT COMPANY'S STOCK PRICE?

A. No. My direct testimony contains an extensive discussion of current macroeconomic conditions affecting Pennsylvanians. I specifically found that average Pennsylvanians are still struggling with lingering inflation concerns while also facing potential additional concerns due to current hostilities in the Persian Gulf.[3] This, while the Company's parent company has seen increasing stock prices for its shareholders and no obvious market distress.[4] I recommended that the Commission take these concerns, including consumer affordability concerns, into consideration when determining just and reasonable rates for the Company.[5] In particular, I argued that the Commission should require some level of shared burden, balancing consumer affordability concerns with the financial interests of the Company.[6]

Q. HAVE OTHER PROMINENT FIGURES EXPRESSED SIMILAR CONCERNS IN PENNSYLVANIA SUBSEQUENT TO THE FILING OF YOUR DIRECT TESTIMONY?

A. Yes. On April 29, 2026, Governor Josh Shapiro issued an open letter to the Commission arguing that customers across the Commonwealth are experiencing higher utility costs, and that rising utility bills have become a driver of inflation.[7] Governor Shapiro stated that utilities must seek ways of procuring capital to finance investments in more affordable ways, conscious of the

[1] Rebuttal Testimony of Rebecca E. Hillery, NFG St. 1-R, at 10:18-22.
[2] *Id.* at 10:22 to 11:1.
[3] Direct Testimony of Michael W. Deupree, OCA St. 1, at 19:7-9.
[4] *Id.* at 19:9-10.
[5] *Id.* at 19:5-7.
[6] *Id.* at 19:10-11.
[7] Open Letter dated April 29, 2026, from Governor Josh Shapiro to Utility Leaders, at 1.

utility burdens facing many consumers across the Commonwealth.[8] In this, Governor Shapiro's message appears to mirror my general argument that the Commission should balance consumer affordability concerns with the financial interests of utilities when determining just and reasonable rates for the Company. I have attached Governor Shapiro's letter to this surrebuttal testimony as Exhibit MWD-10. Likewise, subsequent to withdrawing a proposed increase in rates for its electric and gas operations, David Vahos, the president and chief executive officer ("CEO") of PECO Energy Company ("PECO") stated that PECO's decision to withdraw was based on customer affordability considerations.

> While our filing with the [Commission] would have provided needed improvements in safe and reliable energy delivery, we recognize that Pennsylvanians are struggling with basic necessities like gas, food, and energy and have decided to withdraw our proposal.[9]

I have attached PECO's press release to this surrebuttal testimony as Exhibit MWD-11.

Q. WHAT IS YOUR RECOMMENDATION BASED ON CURRENT MACROECONOMIC CONDITIONS?

A. I continue to recommend that the Commission take into consideration current macroeconomic conditions, including consumer affordability concerns, when determining just and reasonable rates for the Company. Average Pennsylvanians are struggling with lingering inflation concerns while also facing potential additional concerns due to fallout from the conflict in the Persian Gulf. Meanwhile, the Company has seen increasing stock prices for its shareholders and no obvious market distress. The Commission, in particular, should require some level of shared burden, balancing consumer affordability concerns with the financial interests of the Company.

[8] *Id*.
[9] PECO Communications (April 16, 2026), "PECO Withdraws Electric and Natural Gas Regulatory Rate Review Filings to Prioritize Customer Affordability."

Governor Shapiro's recent open letter raising similar concerns only strengthens the urgency for the Commission to recognize these larger concerns, and the broader context surrounding the Company's proposed rate increase.

III. WEATHER NORMALIZATION ADJUSTMENT

Q. PLEASE SUMMARIZE THE COMPANY'S RESPONSE TO INTERVENORS' CONCERNS REGARDING THE COMPANY'S WNA.

A. The Company reiterates its position that the WNA is a symmetrical mechanism which balances weather-driven financial risks equally for both ratepayers and the Company.[10] The Company references the current 2025-2026 heating season, where customers received approximately $2.6 million in net WNA credits as an example of how the WNA functions as a symmetrical mechanism that produces both surcharges and credits for ratepayers.[11] The Company also takes issue with my arguments that the WNA is not needed in the context of other mechanisms at the Company's disposal to address regulatory lag, arguing that the WNA is not designed to address regulatory lag.[12]

Q. DO YOU AGREE WITH THE COMPANY'S CHARACTERIZATION OF THE WNA?

A. No. First, the Company's reference to the WNA producing approximately $2.6 million in net WNA credits to ratepayers is outdated and does not include either the months of April or May 2026. In its rebuttal testimony, the Company estimated that it received $1.4 million in revenues through the WNA in the month of April 2026 alone.[13] It is possible that this remaining credit will be paid to the Company after the month of May 2026 if Pennsylvania experiences warm weather

[10] Rebuttal Testimony of Rebecca E. Hillery, NFG St. 1-R, at 7:10-13.
[11] Rebuttal Testimony of John D. Taylor, NFG St. 19-R, at 30:15-17.
[12] *Id.* at 32:4-16.
[13] Rebuttal Testimony of Rebecca E. Hillery, NFG St. 1-R, at 9, Table 1.

consistent with what was seen in 2024. In total, with the additional $1.4 million the Company estimates it received in revenue in April 2026, it is estimated that the WNA has netted the Company more than $7.9 million since October 2023.

Q. IS IT SURPRISING THAT THE COMPANY'S WNA MECHANISM HAS RESULTED IN DISPROPORTIONATELY PRODUCED SURCHARGES FOR RATEPAYERS?

A. No. Table 1 provides a summary of the results provided in a report prepared on the behalf of several energy advocacy groups in the Pacific Northwest by Graceful Systems that was purportedly designed to support the adoption of revenue decoupling.[14] The table provides the number of instances in which there were observed rate increases or rate decreases for electric and gas utilities under revenue decoupling over a 10-year period. The table shows 72 percent of the gas utilities in the sample and 57 percent of all the electric utilities in the same sample had reconciliations resulting in rate increases instead of rate decreases. This stands in contradiction to the typical utility assertion that decoupling will yield results that are symmetrical (i.e., will lead to equal rate increases and decreases). The results are even more prevalent when examining large reconciliations. Only three percent of all survey reconciliations associated with gas decoupling programs resulted in refunds to customers greater than three percent. This is approximately one-sixth of the 19 percent of surveyed gas decoupling reconciliations that resulted in surcharges to customers of greater than three percent.

[14] *See,* Pamela Lesh, Rate Impacts and Key Design Elements of Gas and Electric Utility Decoupling: A Comprehensive Review (2009).

Table 1: Summary of Lesh Report

Refund/Surcharge	Number of Reconciliations Gas	Electric	Total	Share of All Reconciliations Gas	Electric	Total
Refund Percent						
Greater than 3 percent	2	0	2	3.1%	0.0%	2.3%
Less than or equal to 3 percent	1	3	4	1.5%	13.0%	4.5%
Less than or equal to 2 percent	2	1	3	3.1%	4.3%	3.4%
Less than or equal to 1 percent	13	6	19	20.0%	26.1%	21.6%
Total				**27.7%**	**43.5%**	**31.8%**
Surcharge Percent						
Less than 1 percent	23	7	30	35.4%	30.4%	34.1%
Less than 2 percent	7	4	11	10.8%	17.4%	12.5%
Less than 3 percent	5	2	7	7.7%	8.7%	8.0%
Greater than 3 percent	12	0	12	18.5%	0.0%	13.6%
Total				**72.3%**	**56.5%**	**68.2%**
Total Decoupled Utilities	**65**	**23**	**88**	**100.0%**	**100.0%**	**100.0%**

Source: Rate Impacts and Key Design Elements of Gas and Electric Utility Decoupling

Q. DO YOU AGREE WITH THE COMPANY'S ASSERTION THAT THE WNA SHOULD BE VIEWED INDEPENDENTLY OF REGULATORY LAG?

A. No. The Company takes a narrow view of regulatory lag as only applying to mechanisms designed to recover investments placed into service between rate cases. However, the WNA allows the Company to recover declines in revenues caused by decreasing use per customer ("UPC") between rate cases due to moderating weather. The Company itself highlighted this trend in decreasing Heating Degree Days ("HDDs") in Erie, Pennsylvania, in its direct testimony.[15]

Q. DID THE COMPANY ADDRESS ANY OF YOUR PROPOSED ALTERNATIVE MODIFICATIONS TO THE WNA?

A. Yes. The Company opposes both expanding the WNA deadband to 5 percent and eliminating the months of October and May from the WNA. The Company argues that, given the effectiveness and symmetrical nature of the WNA design, increasing the current deadband from 3

[15] Direct Testimony of John D. Taylor, NFG St. 19, at 25:11-17; and 26, Figure 1.

to 5 percent would increase risks for both ratepayers and the Company unnecessarily.[16] Likewise, the Company opposes removing the months of October and May from the WNA, arguing that there are still some heating requirements during these months.[17]

Q. DO YOU AGREE THAT INCREASING THE WNA DEADBAND FROM THREE TO FIVE PERCENT WOULD INCREASE RISK FOR THE COMPANY AND RATEPAYERS UNNECESSARILY?

A. No. As demonstrated above, mechanisms like the WNA predominantly result in surcharges in the utility's favor. This is true for the Company as well since the WNA has resulted in more than $7.9 million in revenues for the Company since it was first implemented in October 2023. Therefore, increasing the WNA deadband to 5 percent would provide additional protection to ratepayers from minor deviations from normal weather. It would also place the WNA in line with the recently modified WNA mechanisms for Columbia Gas.

Q. DO YOU AGREE WITH THE COMPANY THAT THE PRESENCE OF HEATING REQUIREMENTS DURING A MONTH SHOULD BE THE BASIS FOR INCLUSION IN THE WNA?

A. No. The Company's finding that there are some customer heating requirements during the months of October and May is irrelevant to the question at hand. The Commission need not, nor should it, shift all volumetric weather-related risks from the Company to customers. Indeed, if the purpose of the WNA was to shift all volumetric weather-related risks the mechanism would apply year-round, and the Commission has never approved a year-round WNA mechanism for any Pennsylvania natural gas utility. As shown in Table 2, very little of the annual average customer heating requirements are included in the months of October and May. Specifically, the months of

[16] Rebuttal Testimony of Rebecca E. Hillery, NFG St. 1-R, at 8:7-9.
[17] Rebuttal Testimony of Cathryn E. Hilliard, NFG St. 13-R, at 5:3-7.

October and May represent 6 and 4 percent, respectively, of the total annual heating requirement in Pennsylvania as represented by HDDs. Indeed, the months of November through April contain approximately 88 percent of all Pennsylvania heating requirements.

Table 2: Average 10-Year Pennsylvania Heating Degree Days

Month	10-Year (2016-2025) Average Heating Degree Day	Percent of Total
January	1,145	20%
February	933	16%
March	802	14%
April	503	9%
May	229	4%
June	55	1%
July	6	0%
August	19	0%
September	88	2%
October	361	6%
November	721	12%
December	993	17%
Total	**5,855**	**100%**

Note: Values represent a simple average of four weather stations: Dubois (USW00004787), Erie (USW00014860), Pittsburgh (USW00094823), and Bradford (USW00004751)
Source: National Oceanic and Atmospheric Administration, National Centers for Environmental Information, GHCN-Daily.

Q. DID THE COMPANY RESPOND TO THE CRITICISM THAT IT NORMALIZES ALL PENNSYLVANIA CUSTOMERS BASED ON WEATHER CONDITIONS IN ERIE, PENNSYLVANIA?

A. Yes. The Company claims that, while its Pennsylvania service territory spans a wide geographic area, its customer base is not evenly distributed across it. Specifically, the Company notes that the Erie Service Center alone represents approximately 35 percent of total residential customers in the Company's Pennsylvania service territory.[18] The Company further notes that, when grouped based on the nearest weather station, approximately 44 percent of its customers

[18] *Id.* at 2:19-22.

would be grouped to the Erie weather station.[19] Likewise, the Company claims that if this analysis is extended to include both Erie and Youngstown, which the Company claims has similar weather to Erie, nearly 60 percent of the Company's residential customers would be covered by these two weather stations.[20]

Q. DO YOU FIND THE COMPANY'S ARGUMENTS PERSUASIVE?

A. No. The Company itself notes how the weather along the shores of Lake Erie is distinct from that experienced elsewhere in the Commonwealth.

> National Fuel's service territory in northwest Pennsylvania, along the shores of Lake Erie, experiences longer winters and colder autumn and spring seasons than other utilities in the Commonwealth.[21]

It should be concerning that, after recognizing the distinctive weather patterns of Lake Erie compared to the rest of Pennsylvania, the Company chooses to normalize heating requirements for all of its customer base to a single weather station in Erie, Pennsylvania, even though only 35 percent of its customers live in the surrounding community. Indeed, even if one was to accept the Company's claim that upwards of 60 percent of its residential customer base is represented by weather conditions of Erie or related Youngstown, that still leaves more than 40 percent – almost half – of the Company's residential customer base that the Company inappropriately normalizes to weather conditions in Erie.

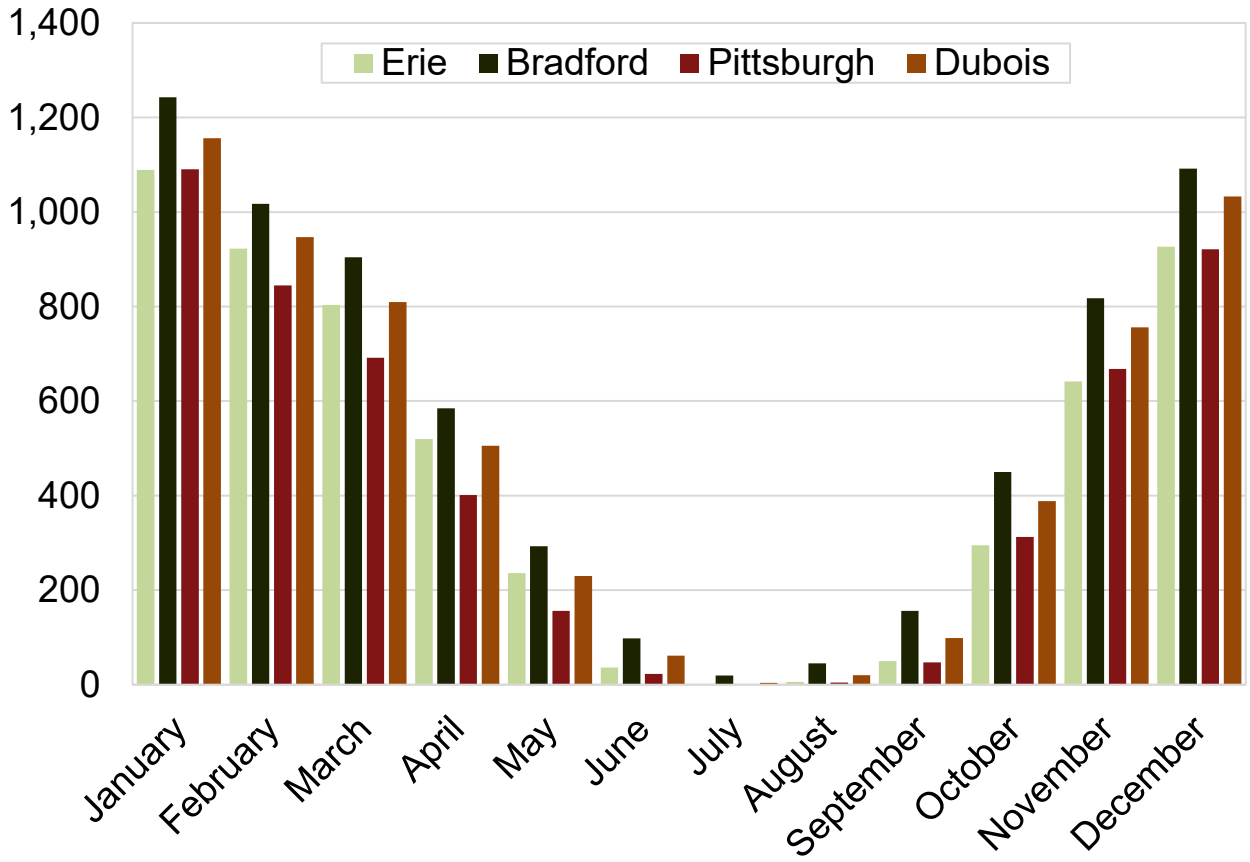
Q. HAVE YOU EXAMINED NORMAL HEATING REQUIREMENTS FOR THE COMPANY'S PENNSYLVANIA SERVICE TERRITORY?

A. Yes. Figure 1 examines the average 10-year HDDs in Erie and three other weather stations located in or near the Company's service territory: DuBois, Pittsburgh, and Bradford,

[19] *Id.* at 3:5-8.
[20] *Id.* at 3:13-15.
[21] Rebuttal Testimony of Rebecca E. Hillery, NFG St. 1-R, at 9:3-6, *emphasis added.*

Pennsylvania. Figure 1 shows that Erie experiences distinctive weather conditions when compared to the Company's service territory located away from Lake Erie. Specifically, Erie experiences relatively mild fall and early winter conditions; however, Erie also experiences prolonged relatively higher heating requirements during the late winter and spring periods compared to other areas of the Company's service territory.

Figure 1: Average 10-Year Heating Degree Days



Source: National Oceanic and Atmospheric Administration, National Centers for Environmental Information, GHCN-Daily.

Q. WHAT ARE YOUR RECOMMENDATIONS REGARDING THE WNA?

A. I continue to recommend the following from my direct testimony:

- The Commission should affirmatively discontinue NFG's current WNA mechanism. The mechanism has failed to produce balanced outcomes for ratepayers, functioning as an

asymmetric surcharge on customers' bills for the two full years the mechanism has been in operation, even though the mechanism was designed as a pilot to symmetrically provide both surcharges and credits to customers. The WNA is also not required to address regulatory lag concerns of the Company given the Company's use of a fully projected future test year ("FPFTY") and distribution system improvement charge ("DSIC").

- If the Commission decides to continue the WNA, I recommend that it be continued as a three-year pilot program rather than being adopted as a permanent mechanism. This will allow the Commission the opportunity to routinely reevaluate the WNA to ensure that the mechanism is not producing negative outcomes for ratepayers. I further recommend that the Commission increase the deadband from three percent to five percent and eliminate the months of October and May from the WNA period. This would strengthen ratepayer protections and would furthermore make the Company's WNA pilot consistent with the recent WNA pilot the Commission approved for Columbia Gas of Pennsylvania (Columbia Gas).

Q. DO YOU HAVE ANY NEW RECOMMENDATIONS BASED ON YOUR REVIEW OF THE COMPANY'S REBUTTAL FILING?

A. Yes. If the Commission decides to continue the WNA, I recommend the Commission order the Company to expand the weather normalization to include three new separate weather stations, in addition to the weather station in Erie, located in or near the Company's service territory: DuBois, Pittsburgh, and Bradford, Pennsylvania. The Company's current process of normalizing its entire service territory based on weather conditions in Erie is flawed based on the unique weather conditions of Erie when compared against the rest of the Commonwealth.

Q. DO OTHER PENNSYLVANIA NATURAL GAS UTILITIES UTILIZE MULTIPLE WEATHER STATIONS IN ITS WNA PROCESS?

A. Yes. UGI Utility's gas division currently uses seven weather stations to normalize heating requirements across its service territory. These include: (1) Wilkes-Barre/Scranton International Airport, (2) Bradford Regional Airport, (3) Reading Regional Airport, (4) Harrisburg International

Airport, (5) Lancaster Airport, (6) Allentown Lehigh Valley International Airport, and (7) Clearfield-Lawrence Airport.[22]

IV. ALLOCATED COST OF SERVICE STUDY

A. Response to NFG

Q. WHAT IS THE COMPANY'S RESPONSE TO YOUR COMPLAINTS REGARDING THE COMPANY'S ACOSS?

A. The Company argues that the development of allocation factors within an ACOSS should use principles of both economics and engineering to develop allocation factors appropriate for different elements of costs, and that my alternative ACOSS fails to fully follow these principles. Specifically, the Company argues that my recommended rejection of the Company's zero-intercept study ("ZIS") and alternative peak and average ("P&A") allocation method "conflates cost recovery with cost causation,"[23] and that while annual throughput influences rate recovery, distribution mains are built to connect customers to the system and provide sufficient capacity to meet coincident peak-day demand.[24]

Q. DO YOU AGREE THAT YOUR RECOMMENDED REJECTION OF THE COMPANY'S ZERO-INTERCEPT STUDY AND ALTERNATIVE P&A ALLOCATION METHOD CONFLATE COST RECOVERY WITH COST CAUSATION?

A. No. The Company over-simplifies the question at issue. As I explained in my direct testimony, zero-intercept studies are fundamentally flawed because they attempt to model an empirical relationship that can be empirically shown not to exist.[25] ZIS methodologies have been

[22] *See, UGI Utilities, Inc. – Gas Division*, PA P.U.C. Docket No. R-2025-3059523, Direct Testimony of John D. Taylor, Exhibit JDT-2 at 1, f.n. 1.
[23] Rebuttal Testimony of John D. Taylor, NFG St. 19-R, at 10:1.
[24] *Id.* at 10:2-5.
[25] Direct Testimony of Michael W. Deupree, OCA St. 1, at 54:14-16.

criticized in academic literature for decades for exactly this point.[26] Likewise, my proposed P&A allocation approach is based on the understanding that natural gas facilities are built to supply both peak and non-peak service as recognized by the Federal Power Commission ("FPC") in 1952.[27] Indeed, the FPC found that "both capacity and annual use are important considerations in the conception of the project," and that therefore both capacity and throughput are cost causation factors driving capital outlays for a pipeline project.[28]

Q. DOES THE COMPANY HAVE OTHER CRITICISMS OF YOUR REJECTION OF THE ZIS APPROACH?

A. Yes. The Company argues that my criticism of ZIS methodologies relying on hypothetical constructs is invalid and mischaracterizes the methodology. Instead, the Company argues that a ZIS does not assume a fictional system but instead uses observed relationships between pipe size and costs to distinguish customer-related investment from capacity-related investment.[29]

Q. DO YOU AGREE WITH THE COMPANY'S ARGUMENTS ABOUT THE ZIS APPROACH NOT RELYING ON HYPOTHETICAL CONSTRUCTS?

A. No. The Company's ZIS uses statistical regression methods to observe the relationship between pipe diameter and pipe unit costs to estimate the cost associated with a hypothetical zero diameter pipe. The Commission should recognize that a zero-diameter pipeline is a complete hypothetical construct used to calculate the supposed customer-related portion of pipeline investments. This makes it so that there is no way to ground truth the Company's ZIS findings to actual services and products in the real world. Indeed, the best verification of the Company's ZIS

[26] *Id.* at 55:29 to 56:8; *citing* James C. Bonbright, et. al. Principles of Public Utility Rates. 1988 Edition. Arlington, VA: Public Utilities Reports, Inc., p. 491.
[27] *Id.* (*citing* Re: Atlantic Seaboard Corporation and Virginia Gas Transmission Corporation, Federal Power Commission Docket No. 11. F.P.C. 43).
[28] Re: Atlantic Seaboard Corporation and Virginia Gas Transmission Corporation, Federal Power Commission Docket No. 11. F.P.C. 43.
[29] Rebuttal Testimony of John D. Taylor, NFG St. 19-R, at 12:18-22.

findings would be to confirm a strong statistical relationship between new customers and increased investments in distribution mains.

Q. CAN YOU CONFIRM A STRONG STATISTICAL RELATIONSHIP BETWEEN NEW CUSTOMERS AND INCREASED INVESTMENT IN DISTRIBUTION MAINS?

A. No. As I showed in my direct testimony, an examination of the trend between changes in the average number of customers on the Company's system and the Company's net investment in distribution mains for the 10-year period 2015 through 2024 fails to find a strong statistical correlation between these two variables.[30] Indeed, I found that, if anything, there is a negative relationship between changes in the Company's customer counts and distribution main investments as the Company made significant investments in its distribution mains system during years when it had slower than average growth. In all, my findings confirm the criticisms of the ZIS method that have been made in academic texts for decades, namely that the ZIS method fails to recognize empirical evidence showing a weak relationship between changes in a utility's customer counts and increased investment in distribution systems.

Q. DID THE COMPANY ADDRESS PROFESSOR BONBRIGHT'S CRITICISM OF OVER-ASSIGNMENT OF COSTS TO THE CUSTOMER COMPONENT?

A. No. The Company argues that Professor Bonbright elsewhere in his 645-page text Principles of Public Utility Rates, makes statements that "strongly suggest" the opposite view that the recognition of a customer component of distribution mains for a gas utility is appropriate. However, the statement the Company references merely expresses the common view that costs related to metering equipment and meter reading, billing and accounting, and either service drops or service lines (depending on whether the utility in question is an electric or natural gas utility)

[30] Direct Testimony of Michael W. Deupree, OCA St. 1, at 57:13-21.

are customer-related as these costs directly vary with changes in a utility's number of customers on its system. Indeed, I summarized customer-related costs similarly to Professor Bonbright's discussion in my direct testimony.[31] The Company fails to address Professor Bonbright's clear and unambiguous position that "the inclusion of the costs of a minimum-sized distribution system among the customer-related costs seems to us clearly indefensible."[32]

Q. HAVE OTHER COMMISSIONS ACROSS THE COUNTRY CRITICIZED ZIS AND RELATED MINIMUM SYSTEM STUDY APPROACHES?

A. Yes. The Iowa State Commerce Commission (now known as the Iowa Utilities Board or "IUB") in a 1984 decision rejected a proposed minimum system study ("MSS") approach by a natural gas utility as "improper and unacceptable,"[33] to functionalize any portion of costs associated with distribution mains as customer-related.[34]

> Distribution mains are not customer-related costs; no part of distribution costs should be allocated to customer-related costs; and the use of a minimum system study to allocate distribution costs to customer-related costs is therefore improper and unacceptable.[35]

Q. WHAT WAS THE BASIS FOR THE IUB'S DECISION?

A. The IUB reviewed a prior decision it had made in a 1981 proceeding, which was highly critical of an MSS approach on both practical and theoretical grounds. Specifically, the IUB noted that in a true "minimum system" circumstance, there would be no need for a distribution system at all as there would be no need to supply energy to customers.[36] While admitting that its prior

[31] *Id.* at 71:19 to 72:5.
[32] James C. Bonbright, *et. al.* Principles of Public Utility Rates. 1988 Edition. Arlington, VA: Public Utilities Reports, Inc., pp. 491-492; emphasis added.
[33] *In Re: Peoples Natural Gas Company, Division of InterNorth Inc.,* Iowa State Commerce Commission Docket No. RPU-84-42, Proposed Decision and Order (June 6, 1985) at 48.
[34] *Id.*
[35] *Id.*
[36] *Id.* at 39-40; citing *In Re: Iowa Power and Light Company,* Iowa State Commerce Commission Docket No. RPU-78-27.

decision referred to a proceeding involving an electric distribution system, the IUB felt the positions expressed were equally applicable to natural gas companies as follows:[37]

> We believe that this minimum system analysis ignores the fact that if no customer were ever to use electric power or energy, there would be no need for a distribution system at all. Thus, the existence of any distribution system, including the Company's proposed minimum system, is justified not by the fact that the Company has customers which it must meter and bill, but rather because Company's customers demand that the system provide electric power and electric energy.
>
> In our opinion, **there is no logical justification for contending that the minimum distribution system cost is customer related**, while conceding that the remaining distribution costs are demand related. The explanation offered by Company – that such a minimum system is necessary to supply "service" to customers (where service is defined as the availability of power and energy whether or not used, with the expectation that customers will not use any power or energy) – ignores the real reason for the existence of the distribution system. That system exists for the sole purpose of supplying power and energy to customers. The Commission sees no reasonable justification for hypothesizing the existence of a distribution system whose purpose is to make power and energy available to customers who are assumed not to want power or energy, and which is not capable of carrying power or energy to those customers should they actually desire to make use of the service. For that reason we reject the inclusion of minimum distribution system costs in Company's proposed customer charge.[38]

Q. HAS THE COMMISSION ITSELF RECENTLY WEIGHED IN ON THE VALIDITY OF CLASSIFYING A PORTION OF COSTS ASSOCIATED WITH DISTRIBUTION MAINS AS CUSTOMER-RELATED?

A. Yes. In its recent 2025 decision regarding proposed rates for Columbia Gas, the Commission adopted a P&A cost allocation method to classify and allocate costs associated with natural gas distribution mains.[39] In reaching its decision, the Commission directly addressed the

[37] *Id.* at 39.
[38] *Id.* at 40 (citing *In Re: Iowa Power and Light Company,* Iowa State Commerce Commission Docket No. RPU-78-27, emphasis in original).
[39] *Pa. PUC v. Columbia Gas of Pennsylvania, Inc.*, Docket No. R-2025-3053499, Opinion and Order at 255.

position that a portion of these costs could be classified as customer-related based on an analysis of a hypothetical minimum system, reaching much the same position as that elaborated by the IUB in the 1980s.

> In light of the above, we remain of the opinion that although mains serve customers, it is the throughput that determines the type of main investment because it is the load that determines the main investment, not the number of customers served. As the Commission stated in Columbia Gas 2021, the existence of one customer, five customers, or ten customers does not determine the amount of mains investment. Mains investment is driven by the loads placed upon it, not by the number of customers served.[40]

B. Response to OSBA

Q. HAVE YOU REVIEWED OSBA'S REBUTTAL TESTIMONY AS IT RELATES TO COST ALLOCATION?

A. Yes. The OSBA in its rebuttal testimony recommends an alternative hybrid cost allocation method that was not expressed previously in its direct testimony.[41] Specifically, the OSBA recommends a cost allocation method which assigns 50 percent of the weight to customer-related costs that are otherwise derived from NFG's ZIS with the remaining allocation determined using the P&A allocation method I recommend in my direct testimony.[42]

Q. DO YOU SUPPORT OSBA'S PROPOSED HYBRID COST ALLOCATION METHODOLOGY?

A. No. The OSBA attempts to propose a Solomonic solution but fails to recognize the inherently flawed nature of the Company's proposed ZIS allocation method. Attempting to mitigate a flawed ACOSS by reducing the influence of the flawed cost allocation does not render the resulting ACOSS any less flawed.

[40] *Id.* (emphasis added).
[41] Rebuttal Testimony of Justin B. Farr, OSBA St. 1-R, at 2:2-6.
[42] *Id.* at 4:11-15.

V. RATE DESIGN

Q. PLEASE SUMMARIZE THE COMPANY'S POSITION REGARDING YOUR RECOMMENDATION THAT THE COMMISSION REJECT THE COMPANY'S PROPOSED INCREASE IN ITS RESIDENTIAL BASIC SERVICE CHARGE.

A. The Company argues that my opposition, and the opposition of the Bureau of Investigation and Enforcement's, to the Company's proposed increase in its residential basic service charge is premised on a misunderstanding of the Company's ACOSS.[43] Specifically, the Company states that its identified residential customer-related costs of $27.17 per month from its ACOSS is independent of its allocation of costs related to distribution mains within the ACOSS.[44]

Q. WHAT IS YOUR RESPONSE TO THE COMPANY'S ARGUMENT?

A. The Commission should recognize the inherent contradiction in the Company's statements. While the Company argues that there is a customer-related component associated with its investments in distribution mains, it recognizes that these costs should not be included in an analysis of customer-related costs for benchmarking monthly basic service charges. Furthermore, while the Company's analysis of customer-related costs does not include costs associated with its investments in distribution mains, it does include costs that are not directly related to providing service to customers such as general plant investments and administrative and general ("A&G") overhead expenses.[45] In my direct testimony, I independently analyzed Company expenses directly related to providing service to customers and found that customer-related costs to provide service to residential customers on the Company's system are approximately $22.70 per customer

[43] Rebuttal Testimony of John D. Taylor, NFG St. 19-R, at 23:16-19.
[44] *Id.* at 23:20 to 24:1.
[45] *See*, Company's ACOSS Workpapers.

per month.[46] Importantly, this means that the Company's current monthly customer charge of $14.00 per month recovers nearly 62 percent of monthly customer-related costs.[47]

Q. DID THE COMPANY RESPOND TO YOUR ALTERNATIVE RECOMMENDATION IF THE COMMISSION DECIDES AN INCREASE IN RESIDENTIAL BASIC SERVICE CHARGES IS WARRANTED?

A. Yes. If the Commission decides that an increase in residential basic service charges is warranted, I argued that this increase should be capped at the overall allowed increase in residential rates, including scalebacks for any adjustment in the overall allowed increase in residential rates. The Company disagrees with this alternative recommendation, arguing that basic service charges should be based on the cost to serve, and that scaling back the customer charge merely to match a reduced revenue requirement would disconnect the rate design from cost causation.[48]

Q. DO YOU AGREE WITH THE COMPANY?

A. No. The Commission should recognize that increasing the customer charge disproportionately to volumetric rates increases the burden on low use customers which are typically low-income customers, as well as decreasing the incentive for customers to conserve energy. Partially for this reason I disagree with the Company's proposed increase in the residential basic service charge. However, if the Commission believes an increase in the residential basic service charge is warranted, it should maintain the existing balance between volumetric and fixed customer charges to not increase the burden on vulnerable communities.

[46] Direct Testimony of Michael W. Deupree, OCA St. 1, at Exhibit MWD-9.
[47] *Id.* at 72:8-9.
[48] Rebuttal Testimony of John D. Taylor, NFG St. 19-R, at 24:16-20.

VI. ENERGY EFFICIENCY PROGRAM

Q. DOES THE COMPANY RESPOND TO YOUR CONCERNS RELATED TO THE PROPOSED ENERGY EFFICIENCY RIDER IN ITS REBUTTAL TESTIMONY?

A. Yes. The Company notes that the criteria established by the National Regulatory Research Institute ("NRRI") are not legally binding on the Commission.[49] The Company furthermore argues that the Commission has consistently evaluated riders on a case-specific basis, considering factors such as policy objectives, scope, duration, customer protections, and reporting requirements.[50]

Q. DO YOU CONTINUE TO RECOMMEND THAT THE COMMISSION REJECT THE PROPOSED ENERGY EFFICIENCY PROGRAM RIDER?

A. Yes. The NRRI guidance I referenced in my direct testimony is based on an examination of regulatory jurisdictions throughout the country, and the requirements that are typically placed on the creation of a cost recovery rider. Specifically, NRRI found that most jurisdictions restrict costs subject to rider recovery to those that are (1) substantial, (2) outside the control of the utility, and (3) volatile in nature. Costs associated with the proposed energy efficiency program satisfy none of these three requirements. I therefore continue to recommend the Commission reject the creation of the proposed energy efficiency rider, instead requiring the Company to recover these costs through base rates.

VII. CONCLUSIONS AND RECOMMENDATIONS

A. Having reviewed the rebuttal testimony filed by the Company in this proceeding, I continue to recommend the Commission:

- Require some level of shared burden in light of recent macroeconomic challenges, balancing consumer affordability concerns with the financial interests of the Company.

[49] Rebuttal Testimony of Erik M. Solomon, NFG St. 18-R at 12:7-10.
[50] *Id.* at 12:13-18.

- Reject the Company's proposed ZIS approach to allocate costs associated with distribution mains within the Company's ACOSS. ZIS and related minimum system studies that are used to classify distribution mains investments are fundamentally flawed and provide little to no value in setting just and reasonable rates. In the alternative, I recommend that the Commission approve an alternative classification of distribution mains that incorporates a P&A cost allocation method using weights based on the Company's test year system load factor.
- Adopt a more reasonable revenue apportionment method based on my alternative ACOSS results that also limits the rate increase compared to the Company's proposed revenue allocation method. First, I recommend that classes with current relative cost parity ratios below 0.95 receive a rate increase equal to 1.15 times the system average increase. Second, I recommend that classes with current relative cost parity ratios greater than 1.05 receive a rate increase equal to 0.85 times the system average increase. Finally, I recommend that the remaining rate increase be equally allocated to remaining rate classes with current relative cost parity ratios of between 0.95 and 1.05.
- Reject the Company's proposed increase in residential and commercial customer charges. An analysis of customer-related costs finds that residential rate classes are currently recovering a majority of customer-related costs through monthly customer charges. The proposal would also negatively impact the public policy goals of energy efficiency and would burden low-use customers with a greater than average portion of any proposed increase in the case. The Commission should keep the Company's current customer charges for all customers. If the Commission decides in the alternative that an increase in monthly customer charges is warranted, these increases should be limited to the percentage increase in class revenue requirement. This would furthermore be subject to scalebacks to reflect changes in allocated class revenue increases pursuant to Commission Orders.

Q. DO YOU HAVE ANY NEW RECOMMENDATION BASED ON YOUR REVIEW OF THE COMPANY'S REBUTTAL FILING?

A. Yes. If the Commission decides to continue the WNA, I recommend the Commission order the Company to expand the weather normalization to include three new separate weather stations, in addition to the weather station in Erie, located in or near the Company's service territory: DuBois, Pittsburgh, and Bradford, Pennsylvania. The Company's current process of normalizing its entire service territory based on weather conditions in Erie is flawed based on the unique weather conditions of Erie when compared against the rest of the Commonwealth.

Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

A. Yes.

Table of Exhibits

Title	Exhibit
Open Letter from Governor Josh Shapiro dated April 29, 2026	Exhibit MWD-10
PECO Communication dated April 16, 2026	Exhibit MWD-11

Open Letter from Governor Josh Shapiro dated April 29, 2026

GOVERNOR JOSH SHAPIRO

April 29, 2026

Dear Utility Leaders:

As you are no doubt aware, many of your customers across the Commonwealth are experiencing markedly higher utility costs. Rising utility bills have themselves become drivers of inflation. While there are many factors affecting those increases, several core causes are directly within your control and result from your policy and fiscal decisions, including the excessive rate requests several utilities have sought in recent years. Last year alone, 13 Pennsylvania utilities requested $975 million in higher rates after those very same utilities had earned a total of $1.4 billion in profits in 2024.

We have reached a tipping point, and this is a moment to put your customers first and change the behaviors causing rate increases. As I've expressed publicly and privately, I believe the 20th century utility model is broken—we can no longer simply prioritize corporate profitability to drive infrastructure development. Rather, we must be laser focused on delivering on the actual needs of our communities. As I stated clearly in my Budget Address in February, Pennsylvania consumers should not be asked to pay a single dollar more than is needed to support a safe and reliable utility system.

Change is needed, and my Administration stands ready to support each Pennsylvania utility in raising the capital you need to invest in your service territories and workers, both in modernizing with cost-effective new technologies and maximizing the existing infrastructure that you have developed over time. However, as we work together to implement this new approach, you must seek to procure that capital in more affordable ways, conscious of the utility burdens facing many consumers across our Commonwealth.

Open Letter from Governor Josh Shapiro dated April 29, 2026

I write today to lay out three commonsense practices to ensure the needs of Pennsylvanians come first. My Administration will use these three practices as a benchmark to evaluate rate case proposals going forward. Let me be clear: my Administration and I will vocally and forcefully oppose rate case requests from utilities that fail to adhere to these three commonsense practices.

First, utilities should seek to raise the most cost-effective forms of capital. Best practices now require you to protect consumers by disfavoring expensive equity when lower-cost debt is available. Given the low risk profile of monopolistic utilities, which maintain a captive rate base able to repay obligations over time, consumers should not be expected to bolster corporate profits through over reliance on costly equity. This means debt should normally represent a clear majority of a utility's proposed ratemaking capital structure, as it does in many other lower-risk industries. As one measure of this approach, any equity share proposed in a rate case in excess of the amount of equity employed by the utility's parent holding company will require extraordinary justification to receive my Administration's support.

For utilities looking to find low-cost sources of capital, my Administration encourages you to apply to the Department of Energy, which is currently offering loan terms as favorable as the 10-year U.S. Treasury yield plus 35 basis points. By comparison, the average Pennsylvania utility requested a return on equity a staggering 682 basis points above the 10-year U.S. Treasury yield last year. Before raising such expensive equity, you should take advantage of more affordable sources of capital, like these loans, that many of your fellow utilities across the country are pursuing. My Administration stands ready to facilitate an introduction to loan officers at the Department of Energy upon your request.

Second, whenever new revenue is sought, a utility must explain in plain, clear language why its proposed investments are necessary, using transparent data to identify a specific reliability or safety concern that will be addressed, or demonstrating with a thorough cost/benefit analysis that the investment will produce significant savings or reliability benefits for consumers. This means showing the value customers will receive in terms of discrete improvements producing tangible outcomes that are timebound, verifiable, and logically linked to the need for additional capital. Creating real value for customers also means maximizing existing grid resources in ways that control costs and defer the need for future upgrades. You must also describe explicitly what amount of your

requested rate increase will be remitted to shareholders through corporate dividends or other means, as compared to what would be used to directly advance the needs of your customers.

Third, you must provide transparent, justifiable equity returns. Pennsylvania has a long, proud tradition of trusting free markets to deliver fair, transparent pricing. In fact, this year marks the 30th anniversary of Act 138, which introduced competition into our utility sector for the first time. That bipartisan law embodies Pennsylvania's deep-seated belief that free-market competition—when properly implemented and overseen—is the best tool for delivering customers the fair value they deserve. Today, we use markets to price our wholesale power and rely on principles of competition to fairly and impartially award public contracts. Yet less accurate administrative determinations—essentially amounting to educated guesses—still govern how much utilities earn on their equity investment. And all too often the outcome of this administrative process is shrouded in "black box" settlements, that do not provide the public with transparency about costs they will have to pay. These vestiges of the past need to evolve to ensure that utilities are not seeking excessive profits but only the opportunity to earn the fair rate of return to which they are entitled.

To accomplish this, utilities can prove their need for a requested return on equity by providing a benchmark (representing at least 10% of the incremental requested equity) that is transparently derived through a public process with competitive bidding by multiple participants to establish a fair market cost of that equity. This sample offers the energy consumer and Public Utility Commission real-world evidence of the proper authorized return on equity, an amount that will allow the utility to earn reasonable equity returns under efficient operations. If a utility declines to justify its requested return on equity through a competitive, transparent process, it creates a presumption in the view of my Administration that the requested rate is higher than would have been derived from such a competitive process. Absent extraordinary and unforeseen circumstances, a utility can overcome that presumption by requesting a return on equity that does not exceed the rate of the current 10-year U.S. Treasury yield plus the five-year median of the equity risk premium as published in the Federal Reserve's Financial Stability Reports. In simple terms, this allows the filing utility to earn the same expected return as the stock market as a whole, according to Federal Reserve estimates, comfortably exceeding typical Public Utility Commission calculations of risk for the utility sector.

Open Letter from Governor Josh Shapiro dated April 29, 2026

This provides an outcome that is fair for your utility and your customers even without an auction or other market-based price discovery mechanism.

This letter is an effort to be up front with you about my Administration's approach to rate requests going forward. In directly laying out these practices, I am making clear my expectations. I stand ready to collaborate with you, the Public Utility Commission, and other stakeholders in advancing thoughtful rate requests that put Pennsylvania families and businesses first and control costs after years of unacceptably high rate increases. Should you wish to have my Administration's support for any future rate requests, you must submit a description of your compliance with these practices to my Special Counsel for Energy Affordability alongside your rate case filings.

I appreciate your compliance with these practices and look forward to working together to control costs for ratepayers and build out the needed infrastructure for our Commonwealth.

Sincerely,

Governor Josh Shapiro

Cc: Honorable Stephen M. DeFrank, Chair, Pennsylvania Public Utility Commission
Honorable Kimberly M. Barrow, Vice Chair, Pennsylvania Public Utility Commission
Honorable Kathryn L. Zerfuss, Commissioner, Pennsylvania Public Utility Commission
Honorable John F. Coleman, Commissioner, Pennsylvania Public Utility Commission
Honorable Ralph V. Yanora, Commissioner, Pennsylvania Public Utility Commission
Mark Szybist, Special Counsel for Energy Affordability, Office of General Counsel

PECO Communication dated April 16, 2026

FOR IMMEDIATE RELEASE

PECO Withdraws Electric and Natural Gas Regulatory Rate Review Filings to Prioritize Customer Affordability

PHILADELPHIA | April 16, 2026

PECO Communications | PECO.Media@exeloncorp.com

PHILADELPHIA, PA (April 16, 2026) – Citing significant financial pressures facing households and businesses across southeastern Pennsylvania, PECO announced it is withdrawing its previously filed electric and natural gas distribution rate review filings with the Pennsylvania Public Utility Commission (PUC). The decision reflects a deliberate effort to prioritize customer affordability while continuing to deliver safe and reliable service.

Customers and communities across the region are facing sustained financial strain driven by rising costs for housing, food, healthcare, transportation, energy supply costs, and other everyday essentials. Against that broader economic backdrop, and taking into consideration conversations with Governor Josh Shapiro, as well as input from customers, community partners, and stakeholders, PECO reassessed the cumulative impact of the proposed rate changes on customers and determined now is not the right time to move forward.

"Keeping bills as low as possible through efforts like PECO's $12.5 million Customer Relief Fund to help low- and middle-income customers struggling with high energy costs is a top priority," said David Vahos, PECO president and CEO. "While our filing with the PUC would have provided needed improvements in safe and reliable energy delivery, we recognize that Pennsylvanians are struggling with basic necessities like gas, food, and energy and have decided to withdraw our proposal. We look forward to working with stakeholders across the region to find long-term solutions to high energy costs and to make needed investments at another time."

The withdrawn filings were intended to support near- and long-term electric and natural gas system modernization. However, it was determined that advancing those longer-term investments at this time would place additional strain on customers who are already managing significantly higher energy supply costs and broader cost-of-living challenges.

This decision reflects a careful balance between customer affordability and the company's responsibility to deliver high-quality service for the long term. PECO is committed to putting customers and communities first and acting responsibly when making major decisions. The company will continue near-term investments focused on system safety, essential maintenance, operational integrity, and reliability standards customers depend on every day. Customers can expect continued strong reliability performance as PECO continues to manage costs responsibly.

At the same time, PECO will continue evaluating longer-term grid modernization investments that support economic growth, job creation, and evolving energy needs across southeastern Pennsylvania. Withdrawing the filings gives the company the flexibility to better assess the timing, scope, and sequencing of those investments in the context of affordability and system priorities.

The company will also refocus on efforts to enact changes that will help to drive down energy supply prices – costs that the company does not control or profit from – to ensure adequate energy supply is available to meet rising demand. This continued "**all-of-the-above**" strategy is essential to continued affordability and reliability.

Safety remains non-negotiable. This strategic pivot does not change how PECO operates or protects its electric and natural gas systems, its employees, or the communities it serves.

PECO remains committed to a strong, transparent partnership with the PUC and will continue engaging regulators and stakeholders as it evaluates the appropriate path forward.

PUBLIC – REDACTED VERSION

OCA Statement 2

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION V. NATIONAL FUEL GAS DISTRIBUTION CORPORATION PENNSYLVANIA DIVISION	: : : : : : :	DOCKET NO. R-2025-3059428

DIRECT TESTIMONY
OF
LAFAYETTE K. MORGAN, JR.

ON BEHALF OF THE PENNSYLVANIA
OFFICE OF CONSUMER ADVOCATE

APRIL 16, 2026

EXETER
ASSOCIATES, INC.
10480 Little Patuxent Parkway, Suite 300
Columbia, Maryland 21044

Public - Redacted Version

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I. Introduction

Q. **PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is Lafayette K. Morgan, Jr. My business address is 10480 Little Patuxent Parkway, Suite 300, Columbia, Maryland, 21044. I am a Public Utilities Consultant working with Exeter Associates, Inc. ("Exeter"). Exeter is a consulting firm specializing in issues pertaining to public utilities.

Q. **PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND QUALIFICATIONS.**

A. I received a Master of Business Administration degree from The George Washington University. The major area of concentration for this degree was Finance. I received a Bachelor of Business Administration degree with concentration in Accounting from North Carolina Central University. I was previously a CPA licensed in the state of North Carolina, however, in 2009, I elected to place my license in an inactive status as I focused on start-up activities for other business interests.

Q. **PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE.**

A. From May 1984 until June 1990, I was employed by the North Carolina Utilities Commission - Public Staff in Raleigh, North Carolina. I was responsible for analyzing testimony, exhibits, and other data presented by parties before the North Carolina Utilities Commission. I had the additional responsibility of performing the examination of books and records of utilities involved in rate proceedings and summarizing the results into testimony and exhibits for presentation before that Commission. I was also involved in numerous special projects, including participating in compliance and prudence audits of a major utility, and conducting research on several issues affecting natural gas and electric utilities.

From June 1990 until July 1993, I was employed by Potomac Electric Power Company ("Pepco") in Washington, D.C. At Pepco, I was involved in the preparation of the cost of service, rate base and ratemaking adjustments supporting Columbia's requests for revenue increases in the State of Maryland and the District of Columbia.

From July 1993 through 2010, I was employed by Exeter as a Senior Regulatory Analyst. During that period, I was involved in the analysis of the operations of public utilities, with emphasis on utility rate regulation. I reviewed and analyzed utility rate filings, focusing primarily on revenue requirements determination. This work involved natural gas, water, electric, and telephone companies.

In 2010, I left Exeter to focus on start-up activities for other ongoing business interests. In late 2014, I returned to Exeter continuing to work in a similar capacity as prior to my hiatus.

Q. **HAVE YOU PREVIOUSLY TESTIFIED IN REGULATORY PROCEEDINGS ON UTILITY RATES?**

A. Yes. I have previously presented testimony and affidavits on numerous occasions before the Regulatory Commission of Alaska, the Colorado Public Utilities Commission, the Georgia Public Service Commission, the Illinois Commerce commission, the Kansas Corporation Commission, the Kentucky Public Service Commission, the Louisiana Public Service Commission, the Maine Public Utilities Commission, the Maryland Public Service Commission, the Massachusetts Department of Public Utilities the North Carolina Utilities Commission, the Public Utilities Commission of Ohio, the Corporation Commission of Oklahoma, the Pennsylvania Public Utility Commission, the Philadelphia Gas Commission, the Philadelphia Water, Sewer and Storm Water Rate Board, the Public Utilities Commission of Rhode Island,

the Public Service Commission of South Carolina, the Public Utility Commission of Texas, the Vermont Public Service Board, the Virginia Corporation Commission, the West Virginia Public Service Commission, the Wyoming Public Service Commission, and the Federal Energy Regulatory Commission ("FERC"). My resume is attached hereto as Appendix A.

Q. **ON WHOSE BEHALF ARE YOU APPEARING?**

A. I am presenting this testimony on behalf of the Pennsylvania Office of Consumer Advocate ("OCA").

Q. **WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

A. Exeter has been retained by the OCA to assist in the evaluation of the general rate filing submitted by National Fuel Gas Distribution Corporation ("NFG" or the "Company"). I have been asked by the OCA to present my findings with respect to the Company's revenue requirement and its proposed rate increase. I calculate the Company's rate base, pro forma operating income under present rates, and overall revenue deficiency based upon my recommended adjustments to the Company's claims. My findings are based upon incorporating the recommendations and findings of other OCA witnesses who are also presenting testimony in this proceeding.

II. Summary of NFG's Rate Increase Application

Q. **PLEASE SUMMARIZE THE RATE RELIEF REQUESTED BY THE COMPANY IN ITS FILING.**

A. On January 28, 2026, NFG filed its base rate case with the Pennsylvania Public Utility Commission (the "Commission") seeking a general rate increase pursuant to 66 Pa. C.S. § 1308(d) of the Public Utility Code. If NFG's full requested increase is granted, the Company's annual base rate distribution revenue would increase by approximately

$19.7 million, or 7.4% on a total revenue basis.[1] For a residential customer using 80 ccf per month, that customer's bill would increase from $83.49 to $88.44 per month, resulting in an increase of $4.95, or 5.9%.[2] The requested increase in rates is intended to provide the Company with an opportunity to earn an 8.78% overall rate of return (including an 11.25% return on common equity) on a rate base of $571.6 million.[3]

According to the Company, the principal reasons for the requested increase in rates are: (1) The required increase in investment in rate base related to the Company's acceleration of its leak-prone pipeline replacement and system modernization activities; (2) The increasing levels of operating costs, such as higher employee wages and compensation, information technology and cybersecurity costs, and the continued effects of inflation driving higher overall costs; and (3) Declining levels of residential and commercial customer usage for heating due to warming weather trends.[4]

Q. **IN CONNECTION WITH THIS CASE, HAVE YOU PERFORMED AN EXAMINATION AND REVIEW OF THE COMPANY'S TESTIMONY AND EXHIBITS?**

A. Yes. I have reviewed the Company's testimonies, exhibits and its rate filing. I have also reviewed the Company's responses to the OCA and the Bureau of Investigation & Enforcement ("I&E") interrogatories.

Q. **WHAT PERIOD HAVE YOU USED IN MAKING YOUR DETERMINATION OF THE COMPANY'S REVENUE REQUIREMENTS?**

[1] Direct Testimony of Rebecca E. Hillery at 5:24.
[2] National Fuel Gas Distribution Corporation Docket No. R-2025-3059428 January 28, 2026 filing cover letter.
[3] National Fuel Gas Distribution Corporation Docket No. R-2025-3059428, Exhibit A - FPFTY Schedule A-1.
[4] Direct Testimony of Rebecca E. Hillery at 13.

A. I used the Fully Projected Future Test Year ("FPFTY") ending October 31, 2027, as the basis for determining the FPFTY revenue requirements, the same period as requested by the Company.

Q. **HAVE YOU PREPARED EXHIBITS TO ACCOMPANY YOUR TESTIMONY?**

A. Yes. I have prepared two sets of exhibits that derives the change in revenues based upon the two rate of return ("ROR") presentations of OCA witness Reno. In Ms. Reno's direct testimony, she presents a recommended ROR of 7.66% and an alternative ROR of 7.62% which are summarized below. In her testimony, Ms. Reno explains the reasons for the two ROR presentations.

OCA Recommended ROR Calculation

Description	Capitalization Ratio	Cost Rate	Weighted Cost
Long-Term Debt	50.00%	5.58%	2.79%
Short-Term Debt	0.00%	0.00%	0.00%
Total Debt	50.00%		2.79%
Common Equity	50.00%	9.74%	4.87%
Total	100.00%		7.66%

Source:
Per OCA Witness Reno

OCA Alternative ROR Calculation

Description	Capitalization Ratio	Cost Rate	Weighted Cost
Long-Term Debt	43.60%	5.58%	2.43%
Short-Term Debt	0.00%	0.00%	0.00%
Total Debt	43.60%		2.43%
Common Equity	56.40%	9.21%	5.19%
Total	100.00%		7.62%

Source:
Per OCA Witness Reno

Accordingly, I am presenting two sets of revenue requirement exhibits which calculate the revenue requirements under both of Ms. Reno's presentations. My Exhibit Set A is

based upon Ms. Reno's recommended ROR of 7.66%. Exhibit Set B is based upon Ms. Reno's alternative ROR of 7.62%. Both sets of exhibits are composed of 19 exhibits and are differentiated by the suffix "A" and "B" to denote the underlying ROR on which the calculation is based. (Eg., Exhibits LKM-1A through LKM-19A.) Both sets of exhibits are consistent in the presentation of the cost of service.

Exhibit LKM-1 provides a summary of revenues and expenses under present and proposed rates. Exhibit LKM-2 summarizes my adjustments to the Company's FPFTY rate base. Exhibit LKM-3 provides a summary of my adjustments to the FPFTY revenues and expenses and the resulting operating income. The supporting schedules for each of the adjustments that I am recommending to the Company's claimed rate base, revenues and operating expenses are presented on Exhibits LKM-4 through LKM-19.

III. Summary of OCA's Change in Revenue

Q. **PLEASE SUMMARIZE YOUR FINDINGS AND RECOMMENDATIONS.**

A. Exhibit Set A presents the OCA's primary recommendation. As shown on Exhibit LKM-1A, I have determined that the Company's annual revenues, using the OCA's recommended ROR, should be increased by $4.069 million annually for the FPFTY ending October 31, 2027. This represents a decrease of $15.612 million from the Company's requested increase of $19.7 million. This is the amount by which revenues exceed those required to generate an overall rate of return on rate base of 7.66% percent after accounting for the OCA's adjustments to the Company's claimed rate base and operating income. Using the OCA's alternative ROR, the Company's annual revenues should be increased by $4.533 million annually for the FPFTY ending October 31, 2027. This represents a decrease of $15.148 million from the Company's requested

increase of $19.7 million. This is the amount by which revenues exceed those required to generate an overall rate of return on rate base of 7.62% percent after accounting for the OCA's adjustments to the Company's claimed rate base and operating income. The table below summarizes my adjustment to the cost of service.

National Fuel Gas Distribution Corporation
Summary of Cost of Service Adjustments
($ in Thousands)

Line No.	Description	Rate Base	Revenue	Operating Expenses	Income Taxes Effect
1	Adjustment to Cash Working Capital	$ (1,184)	$ -	$ -	$ -
2	Include CIAC in Rate Base	(45)	-	-	-
3	Include Customer Advances in Rate Base	(54)	-	-	-
4	Effect of Depreciation Rates on Accum. Depreciation	4,670	-	-	-
5	Reflect Growth in Rent From Gas Property	-	12	-	3
6	Remove Stock-Based Compensation	-	-	(1,430)	379
7	Amortize Insurance Settlement Proceeds	-	-	(312)	83
8	Remove Office Employee Inflation Adjustment	-	-	(64)	17
9	Remove Other Expense -Line Hit Collections	-	-	(156)	41
10	Remove Charge Off Of Customer A/R	-	-	(147)	39
11	Normalize Uncollectible Expense	-	-	(73)	19
12	Reflect Postage Rate Increase	-	-	(175)	46
13	Remove Economic Development	-	-	(17)	4
14	Include Customer Payment Transaction Costs	-	-	930	(247)
15	Reflect OCA Recommended Depreciation Rates	-	-	(4,670)	1,238
16	Interest Synchronization Adjustment	-	-	-	(571)
17	Total OCA Adjustments	$ 3,387	$ 12	$ (6,113)	$ 1,051

Q. **HOW IS THE REMAINDER OF YOUR TESTIMONY ORGANIZED?**

A. This section, Section I, provides the introductory information to my testimony. Section II presents a summary of my findings and conclusions. In Section IV, I document and explain each of the accounting adjustments that I have made to the rate base and operating income to arrive at the test year revenue increase shown on Exhibit LKM-1.

Additionally, attached to this testimony, I present the exhibits that support my adjustments and summarize my revenue requirement recommendation. Appendix A, attached to this testimony, provides my resumé which summarizes my professional experience.

IV. Revenue Requirement Issues

1. Working Capital Allowance

Q. **WHAT ARE THE COMPONENTS OF RATE BASE THAT FORM A UTILITY'S TOTAL WORKING CAPITAL CLAIM?**

A. For ratemaking purposes, the working capital allowance is composed of two categories of funds that are captured in rate base in order to recognize the cost of funds that a utility needs to dedicate to acquiring certain goods and services and to provide cash for day-to-day operations. The two categories are: (1) the Cash Working Capital Allowance and (2) Inventory and Prepayments (i.e., Materials & Supplies inventory, Stored Gas inventory and Prepaid Expenses)

Q. **WHAT IS THE CASH WORKING CAPITAL ALLOWANCE?**

A. The cash working capital allowance measures the funds which the utility needs to have on hand to fund its day-to-day utility operations. The Company's cash working capital allowance is calculated based upon the results of a lead/lag study. A lead/lag study is an in-depth analysis that measures the difference between the lapse of time when a company receives revenue for the provision of service and the lapse of time when a company pays for the costs of providing service. This difference is expressed as a number of days and is used to calculate the level of investor-supplied funds advanced for operations, or the funds advanced by customers for operations. A positive cash working capital allowance is considered to represent funds provided by investors; the

utility is entitled to earn a return on those funds. Negative cash working capital represents funds supplied by ratepayers that should be recognized as a rate base offset to reflect funds advanced for operations by ratepayers.

Q. **WHAT CHANGES HAVE YOU MADE TO THE CASH WORKING CAPITAL ALLOWANCE?**

A. The operating expenses (O&M expenses and taxes) and interest expense are the bases on which the lead/lag study derives the cash working capital allowance. Therefore, when calculating the cash working capital allowance, any adjustment made to operating expenses, taxes or interest expense (as a result of changes in the capital structure or the cost of debt) should also be incorporated in the lead/lag study.

My adjustment to the cash working capital allowance reflects the following adjustments. First, I have adjusted the lead/lag study to reflect the adjustments to the operating expenses that I have recommended. In addition, the changes that I recommended to rate base have also affected the synchronized interest adjustment. This results in a change in the interest expense used in the lead/lag study. Second, there are a number of amortizations and accrued expenses that are reflected in the operating expenses. These expenses do not require the use of cash, so I have removed those expenses from the lead/lag study. Given that these are non-cash expenses, it is inappropriate to include a cash working capital allowance for these expenses. After reflecting the changes discussed above, I am recommending an adjustment to the cash working capital allowance. This adjustment results in a decrease in rate base of $1,184,000 as presented on Exhibit LKM-4A.

Q. **WHAT ADJUSTMENT ARE YOU RECOMMENDING TO PREPAID EXPENSES?**

A. Prepaid expenses represent the payment of expenses prior to the period in which the goods or services are used. This means that the Company loses the ability to use the cash, used to pay the prepaid expenses, for other purposes. From a working capital perspective, since the cash used for the prepaid expense is lost to the vendor before the goods or services are used for the period, the Company is entitled to the time value of the funds during the period before the goods or services have been used. However, the expenses that are recognized during the accounting period cannot also be included in the lead/lag study where an allowance for cash working capital is provided, while simultaneously including the related prepaid expenses in rate base. This would lead to a double counting of the cash working capital related to these expenses. To prevent this double counting of the cash working capital related to the prepaid expenses, I am recommending an adjustment to remove the prepaid expenses from rate base. This adjustment results in a decrease in rate base of $1,080,000 which was claimed by the Company.

2. Contributions in Aid of Construction

Q. **WHY ARE YOU MAKING AN ADJUSTMENT TO CONTRIBUTIONS IN AID OF CONSTRUCTION?**

A. Contributions in aid of construction ("CIAC") is a transaction in which a utility receives upfront payments for new or expanded service, such as a line extension under certain circumstances. It may also include plant in service or other goods and services given to a utility for nothing in return. Utilities typically receive contributions such as land, buildings, equipment, from developers and large customers. The value of the payments received, system infrastructure equipment and materials that are received and used by the utility to provide service to customers represent the cost of investments that are not

incurred by the utility. For ratemaking purposes, the value of the investments not incurred by the utility represents cost free capital to the utility. Therefore, the utility is not entitled to receive a return on the avoided cost of the investment and CIAC is deducted from rate base.[5]

NFG has certain CIAC on its books which it has not reflected as a reduction to rate base. Consistent with traditional ratemaking practices, I am recommending an adjustment to reduce rate base by $45,000, the value of the CIAC account. This adjustment is presented on Exhibit- LKM 5A.

3. Customer Advances for Construction

Q. **WHY ARE YOU MAKING AN ADJUSTMENT TO CUSTOMER ADVANCES FOR CONSTRUCTION?**

A. Customer Advances for Construction represents advances by customers for construction which are to be refunded either wholly or in part by the utility at a later date. While these funds are held by the Company, it has use of these funds for the construction project which is used to offset its costs. For ratemaking purposes, the value of the investments not incurred by the utility represents cost free capital to the utility. Therefore, the utility is not entitled to receive a return on the avoided cost of the investment and Customer Advances are deducted from rate base.

NFG has certain Customer Advances on its books which it has not reflected as a reduction to rate base. Consistent with traditional ratemaking practices, I am recommending an adjustment to reduce rate base by $54,000, the value of the Customer Advances account. This adjustment is presented on Exhibit- LKM 5A.

[5]Pennsylvania Public Utility Commission, A guide to Utility Ratemaking, 2018 Edition, page 124.

4. Forfeited Discounts

Q. **PLEASE EXPLAIN YOUR ADJUSTMENT TO FORFEITED DISCOUNTS.**

A. Forfeited Discounts are additional charges, such as late fees, imposed on customers because of the failure of customers to pay their utility bills on or before a specified date. These fees are usually charged as a percentage of the original bill. Because the rate increase to be decided will result in higher bills, the forfeited discount will increase as well since it is based on a percentage of the utility service bill. I have calculated the forfeited discount percentage based on the ratio of the forfeited discount to total service revenues for the three most recent historical years. This results in an increase in Other Revenues of $25,000 which is the amount by which I have adjusted Forfeited Discounts. This adjustment is presented on Exhibit LKM-6A.

5. Rent from Gas Property

Q. **PLEASE EXPLAIN YOUR ADJUSTMENT TO RENT FROM GAS PROPERTY.**

A. The Company indicates that Rent From Gas Property was held flat for the FTY and the FPFTY.[6] However, in the three most recent years, the Company has experienced a 6% average annual growth in Rent From Gas Property. Based upon the historical experience, I believe it is appropriate to reflect the historical growth in this account for the FPFTY. Therefore, I have adjusted Rent From Gast Property by $12,000 on Exhibit LKM-7A.

6. Incentive Compensation Expense

Q. **PLEASE EXPLAIN YOUR ADJUSTMENT TO INCENTIVE COMPENSATION EXPENSES.**

[6] Responses to Section 53.53 III-H.5.

A. **[Confidential Begins.]** [redacted][7] **[Confidential Ends]**

I am recommending an adjustment to remove the 2010 Equity Compensation Plan expense from the cost of service based upon the stated purpose of the plan, which is to "advance the interests of the Company and its stockholders."[8] As an investor-owned utility, the interests of the Company and its stockholders primarily depend on the Company remaining a going concern. As such, operating the Company is based upon a profit motive. Hence, one of the primary interests of the Company and its shareholders is to achieve earnings that are high enough to attract investors, achieve financing on good terms and improve shareholder value. The achievement of earnings goals is primarily targeted towards increasing shareholder value and benefiting shareholders. Therefore, these costs are not properly recoverable from ratepayers for several reasons.

[7] 2010 Equity Compensation Plan, Amended and Restated December 7, 2023, Section 1.
[8] *Id.*

First, if the financial targets are set properly, achieving the necessary performance should be self-supporting. This means that the measures that achieve additional cost savings, increase revenue, or otherwise improve financial results should generate the necessary income to cover the incentive plan payments. Second, these payments are not tied to ratepayer benefits such as meeting quality of service, operational efficiency, or conservation goals. Finally, the incentive to improve financial performance is not necessarily consistent with the interests of NFG's ratepayers, but, instead, is more aligned with shareholders' interests. Shareholder value has a correlation to earnings, so when improved earnings are reported, shareholder value improves but rates do not go down. Thus, the beneficiaries of the improved earnings are the shareholders. Therefore, it is appropriate for shareholders, not ratepayers, to bear these costs. Finally, the incentive to improve financial performance is not necessarily consistent with the interests of NFGD's ratepayers, but, instead, is more aligned with shareholders' interests. Shareholder value has a correlation to earnings, so when improved earnings are reported, shareholder value improves but rates do not go down. Thus, the beneficiaries of the improved earnings are the shareholders. Therefore, it is appropriate for shareholders, not ratepayers, to bear these costs.

Q. **WHAT IS THE EFFECT OF YOUR ADJUSTMENT TO ELIMINATE THE INCENTIVE COMPENSATION PAYMENTS?**

A. The adjustment to incentive compensation is presented on Exhibit LKM-8A. My adjustment reduces O&M expenses by $1.430 million.

7. Insurance Settlement Proceeds

Q. **PLEASE EXPLAIN YOUR ADJUSTMENT TO INSURANCE SETTLEMENT PROCEEDS.**

A. The Company has $936,314 in a regulatory liability account on its books which represents environmental proceeds from an insurance settlement. According to the Company, the insurance proceeds that have been deferred as a regulatory liability since the ratepayers paid for the premiums on the original policy.[9] I am recommending that this liability be returned to customers since the insurance costs were paid by customers.

Q. **ACCORDING TO THE COMPANY, THE AMOUNT IN THIS ACCOUNT WAS USED TO PAY FOR ENVIRONMENTAL CLAIMS AS THEY ARISE.[10] WHY IS IT NECESSARY TO REFUND THE BALANCE TO RATEPAYERS?**

A. As explained by the Company, these are ratepayers' funds,[11] so they are entitled to have them returned. The statement by the Company that the funds in this account are used to pay claims as they arise is vague as far as how long the Company may end up holding these funds. As I understand the Commission's historical practice, I am unaware of a means by which ratepayers can receive the time value of the funds held by the Company. This means that the Company has use of these funds on a cost-free basis. If these funds are not returned to ratepayers by lowering their rates, ratepayers will end up paying higher rates while the Company retains use of their funds on a cost-free basis. I believe this is not a fair proposition for ratepayers. Therefore, on Exhibit-LKM 9A, I am recommending a reduction in operating expense of $312,000 to reflect a 3-year flowback of these funds to ratepayers.

8. Office Employee Expenses

Q. **PLEASE EXPLAIN YOUR ADJUSTMENT TO OFFICE EMPLOYEE EXPENSES.**

[9] III-F.8, Footnote 4.
[10] III-F.8, Footnote 4.
[11] *Id.*

A. The Company has proposed an adjustment to increase Office Employee Expenses using a compound growth rate of 3.67% based on the FY 2023 to FY 2025 period. I am recommending an adjustment to remove the increase in this expense line item because this approach is inconsistent with my understanding of the zero-based budgeting approach that NFG witness Formato claims the Company uses for its operating budget. My understanding of zero-based budgeting is that the development of the budget each year begins with a clean slate, and then based upon the activities and plans for the budget year, the budget is developed based upon costing out the resources needed to achieve those plans and activities. In my opinion, applying a compound growth rate to historical costs is not consistent with zero-based budgeting and does not produce results that are representative of the cost that would be incurred in the FPFTY because there is no correlation of the planned activities for the budget year and the underlying costs used to develop the budget. Therefore, I am recommending an adjustment to remove the effects of the compound growth rate from this expense. This expense is presented on Exhibit LKM-10A_ and results in a $64,000 decrease in operating expenses.

9. Other Expense -Line Hit Collections

Q. **PLEASE EXPLAIN YOUR ADJUSTMENT TO OTHER EXPENSE -LINE HIT COLLECTIONS.**

A. Line hit collections represent the amount recovered in reimbursements for damage to the Company gas lines. The Company made an adjustment to normalize line hit collections because the amount recovered during FY 25 was unusually high in comparison to the two prior years.

I am recommending an adjustment to reverse the Company's adjustment because I believe it is one-sided and unfair. Based on my understanding, the Other

Expense account is used to capture the expense incurred to repair damages to the Company's gas lines. This means that line hit collections received are used to offset the repair expenses. If the line hit collections are unusually high in any one year, by extension, it means that line hit repairs expenses were higher as well. Therefore, both components of the net cost to repair damaged lines should be normalized to fairly normalize the cost of repairs. In other words, if the cost offsetting component is being normalized, then it is also appropriate to normalize the expenses incurred. If only the reimbursements (line hits collections) are normalized, it would result in higher expenses. Therefore, on Exhibit 11A, I am recommending an adjustment to reduce operating expenses by $156,000.

10. Charge Off of Customer A/R

Q. **PLEASE EXPLAIN YOUR ADJUSTMENT TO "CHARGE OFF OF CUSTOMER A/R."**

A. The Company uses the uncollectible expense account to normalize and recover uncollectible expenses. Hence, it is understood that this account is considered to be the account that is used to capture write-offs of customer accounts receivables. However, during my review of Other Expenses, I discovered a line item described as "Charge Off Of Customer A/R". From the name of the account, it appears to be a second account that is included in the cost of service to recover write-offs of accounts receivables. I have removed this account because it is unclear to me what this account represents and whether it is duplicative of the costs included in the uncollectible expense. I am requesting that in NFG's rebuttal testimony, the Company should fully explain the nature of this account and why it is appropriate to have another account to write-off

customer accounts receivable. Therefore, on Exhibit 12A, I am recommending an adjustment of $147,000 to remove this expense from the cost of service.

11. Uncollectible Expense

Q. **PLEASE EXPLAIN YOUR ADJUSTMENT TO UNCOLLECTIBLE EXPENSE.**

A. The uncollectible expense is derived from a ratio based upon a three-year average of uncollectible expense (based on net write-offs) to revenues. The Company calculated an uncollectible factor of 1.53% based on the three-year uncollectible ratio that was calculated from the historical data, and then added a 0.02% management adjustment to derive a total uncollectible factor of 1.55%. The Company stated that "the management adjustment of 0.02% was made to account for the dynamic that the uncollectible factor would likely rise because of higher customer bills stemming from the Company's proposed rate increase."[12] I disagree with this approach because the revenue gross up factor includes a component for uncollectible expense. As a result, the calculated revenue increase is grossed up to reflect the value of higher uncollectible accounts resulting from the rate increase.

I am recommending an adjustment which reduces uncollectible expense by $73,000 as a result of removing the 0.02% management adjustment. This adjustment is presented on Exhibit LKM-13A.

Q. **DID YOU MAKE ANOTHER ADJUSTMENT RELATED TO THE UNCOLLECTIBLE FACTOR?**

A. Yes. The 1.55% uncollectible factor was used by NFG in the revenue gross-up factor. As I explained above, I have corrected the uncollectible factor in the revenue gross-up

[12] Response to OCA 14-12.

calculation to reflect the 1.53% uncollectible factor which is based on the actual three-year historical data.

12. Postage Expense

Q. **PLEASE EXPLAIN YOUR ADJUSTMENT TO POSTAGE EXPENSE.**

A. The Company adjusted 1st class postage expense based on the compound annual growth rate for three years. I disagree that the Company growth rate is representative of the future increases in 1st class postage. First, the analysis is backward looking during a period when the US Postage Service implemented frequent rate increases. This type of increase is not likely to be repeated based on statements made by the US Postage service. In September 2026, the U.S. Postal Service ("USPS") announced there would be no stamp price changes for January 2026.[13] Although, the USPS subsequently announced price changes for 2026, those price changes were not for 1st class mail.[14] On April 9, 2026, , the U.S. Postal Service announced a 4.8% increase in 1st class stamp prices effective July 12, 2026.[15] At this time, this is the only known change in the price of 1st class postage. Hence, the Company's 9% projected postal price increase is speculative and not known or certain at this time. Therefore, on Exhibit 14A, I have calculated postage expense to reflect the 4.8% scheduled postage rate increase. This calculation results in an adjustment that decreases postage expenses by $175,000.

13. Economic Development Expense

Q. **PLEASE EXPLAIN YOUR ADJUSTMENT TO ECONOMIC DEVELOPMENT EXPENSE.**

[13] https://about.usps.com/newsroom/national-releases/2025/0924-usps-announces-no-stamp-price-changes-for-january-2026.htm
[14] https://about.usps.com/newsroom/national-releases/2025/1114-usps-recommends-new-competitive-prices-for-2026.htm
[15] https://about.usps.com/newsroom/national-releases/2026/0409-usps-recommends-new-prices-for-july.htm

A. The Company included annual dues for membership in three economic development organizations in the cost of service -- Erie Downtown Development Corporation, Penn-Northwest Development Corp, and Clarion County Economic Development. Erie Downtown Development Corporation's ("EDDC") mission statement states: "Downtown Erie is undergoing massive transformational change. Visionary business, philanthropic and community leaders formed the EDDC in 2017, to transform the city of Erie's downtown core and spark revitalization across the region."[16] The mission statement of Penn-Northwest Development Corporation states: "Penn-Northwest Development Corporation was born out of a necessity to confront and overcome the economic challenges faced by Mercer County. Witnessing the effects of industrial downturns and the need for sustainable economic revitalization, our mission is clear: to proactively address these challenges with robust solutions. We are deeply invested in Mercer County's prosperity, not merely because it is our home, but because we believe in the potential and resilience of its people. Our commitment to economic development is, at its core, a commitment to the community's future—fueling growth, opportunity, and a better quality of life for every resident."[17] Finally, Clarion County Economic Development's mission statement states: "For more than 30 years, the Clarion County Economic Development Corporation's mission has been to work with existing and prospective wealth generating companies to create and keep family sustaining jobs in Clarion County."[18] Clearly, none of these organizations are focused on employee development or related to the utility operations.

Accordingly, the amount paid by NFG to the Erie Downtown Development Corporation is for annual dues for the non-profit organization focused on revitalizing

[16] https://www.erieddc.org/
[17] https://www.penn-northwest.com/about
[18] https://www.co.clarion.pa.us/government/departments/economic_development_corp_/index.php

downtown Erie, Pennsylvania, through development projects.[19] The amount paid to Penn-Northwest Development Corp is for annual membership in the organization which provides economic development functions in cooperation with existing development groups and local governments throughout Mercer County, Pennsylvania.[20] For Clarion County Economic Development, the amounts paid were for annual membership in the organization that assists existing and prospective wealth generating companies to create and keep family sustaining jobs in Clarion County.[21]

Membership in these entities has very little to do with providing service to current ratepayers and is more closely aligned to corporate image building. Moreover, economic development is not a function of a public utility, so it is not appropriate to recover these costs from ratepayers. Therefore, on Exhibit LKM-15A, I am recommending an adjustment to remove these costs of $17,000 from the cost of service.

14. Customer Payment Transaction Fees

Q. **PLEASE EXPLAIN YOUR ADJUSTMENT TO CUSTOMER PAYMENT TRANSACTION FEES.**

A. OCA witness Wise recommends that customer bill payment transaction fees be absorbed by the Company for those customers who pay their bills by credit and debit cards, as well as electronic payment methods such as Venmo and PayPal. Based on her recommendation, I have adjusted operating expenses by $930,000 to include the cost of the transaction fees in the cost of service. This adjustment is presented on Exhibit LKM16A.

[19] Response to OCA 10-34 Attachment.
[20] *Id.*
[21] *Id.*

15. Depreciation Expense

Q. **WHAT ADJUSTMENT ARE YOU RECOMMENDING TO DEPRECIATION EXPENSE?**

A. OCA witness Andrews is recommending changes to the Company's proposed depreciation rates. On Exhibit LKM-17A, I am recommending an adjustment to decrease depreciation expense to reflect Mr. Andrews' recommendations. This adjustment results in a decrease to Depreciation Expense of $4.67 million.

Q. **BASED ON THE ADJUSTMENT TO DEPRECIATION EXPENSE, ARE YOU MAKING ANY ADDITIONAL ADJUSTMENTS?**

A. Yes. I am also adjusting the Company's claimed accumulated depreciation balance. Annual depreciation expense accruals are summed and included in the utility's accumulated depreciation balance as an offset to gross plant in service. I have made a corresponding downward adjustment of $4.67 million to NFG's accumulated depreciation claim consistent with OCA witness Andrews' depreciation expense adjustment, resulting in an increase to the Company's claimed rate base balance of the same amount.

16. Pennsylvania Corporate Income Tax

Q. **WHAT ADJUSTMENT HAVE YOU MADE TO THE PENNSYLVANIA CORPORATE INCOME TAX?**

A. The Commonwealth of Pennsylvania passed legislation that instituted a multi-year phasedown of corporate income tax rates beginning in 2023 to reduce the tax rate from 9.99% to 4.99% by 2031. The Company used the 2026 tax rate of 7.49% in the determination of the revenue requirement. However, for the majority of the months in the FPFTY, the tax rate will be at the 2027 tax rate of 6.99%. Therefore, I have used

the 2027 tax rate of 6.99% in the determination of my recommended change in revenues. It should be noted that in this jurisdiction, the Commission allows utilities to recover or refund any difference in tax expense related to changes in the tax rates. As a result, NFG does not run the risk of under recovering its state income tax expense for the FPFTY.

17. Interest Synchronization

Q. **PLEASE EXPLAIN YOUR INTEREST SYNCHRONIZATION ADJUSTMENT.**

A. To determine the tax deductible interest expense for ratemaking, I have multiplied the OCA's recommended rate base by the weighted cost of debt included in the capital structure recommended by OCA witness Reno. This procedure synchronizes the interest expense deduction for tax purposes with the interest component of the return on rate base to be recovered from ratepayers. As shown at the bottom of Exhibit LKM-18A, this adjustment increases the interest expense deduction by $2,153,000 to a total of $16.042 million compared to the interest deduction of $13.889 million calculated by NFG. This decreases state and federal income taxes by $150,000 and $421,000, respectively.

18. Cost of Capital

Q. **ON EXHIBIT LKM -19A, YOU PRESENT A CALCULATION OF THE RATE OF RETURN, INCLUDING THE CAPITAL STRUCTURE. ARE YOU MAKING ANY RECOMMENDATION REGARDING THE RATE OF RETURN OR CAPITAL STRUCTURE?**

A. No. The OCA's capital structure and cost of capital recommendations are sponsored by Ms. Reno. The purpose of this exhibit is to show the calculation of the rate of return used in my derivation of the revenue requirement.

Q. **DOES THIS COMPLETE YOUR DIRECT TESTIMONY?**

A. Yes, it does.

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION		
V.	:	DOCKET NO. 2025-3059428
NATIONAL FUEL GAS DISTRIBUTION CORPORATION PENNSYLVANIA DIVISION	:	

EXHIBITS ACCOMPANYING THE DIRECT TESTIMONY OF LAFAYETTE K. MORGAN, JR.

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION		
V.	:	DOCKET NO. 2025-3059428
NATIONAL FUEL GAS DISTRIBUTION CORPORATION PENNSYLVANIA DIVISION	:	

Exhibit LKM Set A

National Fuel Gas Distribution Corporation

Summary of Operating Income
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Company Amounts at Present Rates	OCA Adjustments	Amounts After OCA Adjustments	Pro Forma Change in Revenues	Amounts After Change in Revenues
		(1)	(2)	(3)	(4)	(5)
1	Total Operating Revenues					
2	Customer & Distribution Revenue	$ 139,680 [1/]	$ -	$ 139,680	$ -	$ 139,680
3	Gas Supply & Cost Adjustment Revenue	124,571 [1/]	12	124,583	-	124,583
4	Other Revenues	1,273 [1/]	-	1,273	25 [5/]	1,298
5	Increase in Service Revenue	-	-	-	4,044	4,044
6	Total Revenues	265,524	12	265,536	4,069 [6/]	269,605
7						
8	Total Operating Expenses					
9	Operation & Maintenance Expenses	204,049	(1,443)	202,605	62	202,668
10	Depreciation & Amortization Expense	25,302 [2/]	(4,670)	20,632	-	20,632
11	Taxes Other Than Income Taxes	2,489 [3/]	-	2,489	-	2,489
12	Total Operating Expenses	231,839 [4/]	(6,113)	225,726	62	225,788
13						
14	Operating Income Before Income Taxes	33,684	6,126	39,810	4,007	43,817
15						
16	Income Taxes:					
17	State	(330)	277	(53)	284	231
18	Federal	(2,010)	774	(1,236)	782	(454)
19	Total Income Taxes	(2,340)	1,051	(1,289)		(223)
20						
21	Net operating income Before Income Tax	$ 36,024	$ 5,075	$ 41,099	$ 4,007	$ 44,040
22						
23	Rate Base	$ 571,582		$ 574,968		$ 574,968
24						
25	Return On Rate Base	6.30%		7.15%		7.66% [6/]

Notes:

[1/] Company FPFTY Schedule A-1.

[2/] Company FPFTY Schedule D-1, Line 15.

[3/] Company FPFTY Schedule D-1, Line 16.

[4/] Company FPFTY Schedule D-1, Line 17.

[5/] Exhibit LKM -6A

[6/] Calculated at OCA Recommended ROR.

National Fuel Gas Distribution Corporation

Summary of Revenue Increase at OCA Rate of Return
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description		Amount	Source
1	Adjusted Rate Base		$ 574,968	Exhibit LKM-2, Page 1
2	Required Rate of Return		7.660%	Exhibit LKM -19A
3				
4	Net Operating Income Required		$ 44,043	
5	Net Operating Income at Present Rates		41,099	Exhibit LKM-1, Page 1
6				
7	Income Deficiency/(Surplus)		$ 2,944	
8	Revenue Multiplier		1.382099	1/
9				
10	Required Change in Company Revenue		$ 4,069	
11				
12	Proposed Revenue Change		$ 4,069	
13	Less: Uncollectible	1.53%	$ 62	
14	Less: State Income Tax	6.99%	284	
15				
16	Income Before Federal Taxes		$ 3,722	
17	Federal Income Tax	21.00%	782	
18				
19	Income Deficiency/(Surplus)		$ 2,941	

1/ Revenue Conversion Factor

Gross Revenue Factor	1.000000
Uncollectible Expense	-0.015300
State Taxable Income	0.984700
State Income Tax @6.99%	-0.068831
Federal Taxable Income	0.915869
Federal Income Tax @ 21%	-0.192332
Net Operating Income Factor	0.723537
Revenue Conversion Factor	1.382099

National Fuel Gas Distribution Corporation

Summary of Rate Base
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount per Company Filing [1/]	OCA Adjustments [2/]	Amount After OCA Adjustments
		(1)	(2)	(3)
1	Utility Plant	$ 957,237	$ -	$ 957,237
2	Accumulated Depreciation	(320,571)	4,670	(315,901)
3	Net Plant in Service	636,667	4,670	641,337
4	Working Capital	6,755	(1,184)	5,571
5	Gas Inventory	5,664	-	5,664
6	Accumulated Deferred Income Taxes	(73,925)	-	(73,925)
7	Customer Deposits	(5,166)	-	(5,166)
8	Contribution in Aid of Construction	-	(45)	(45)
9	Customer Advances	-	(54)	(54)
10	Materials & Supplies	1,587	-	1,587
11				
12	Total Rate Base	$ 571,582	$ 3,387	$ 574,968

Notes:
[1/] Company Schedule C-1, FPFTY.
[2/] Exhibit LKM - 2A, Page .2

National Fuel Gas Distribution Corporation

Summary of Rate Base Adjustments
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Source	Amount
1	Rate Base per Company Filing	Exhibit LKM-3A	$ 571,582
2	OCA Adjustments:		
3	Adjustment to Cash Working Capital	Exhibit LKM - 4A	(1,184)
4	Adjustment to Include CIAC	Exhibit LKM -5A	(45)
5	Adjustment to Include Customer Advances	Exhibit LKM -5A	(54)
6	Adjustment to Accumulated Depreciation to Reflect OCA Recommended Depreciation Rates	Exhibit LKM -17A	4,670
7			
8	Total Ratemaking Adjustments		$ 3,387
9	Adjusted Rate Base per OCA		$ 574,968

National Fuel Gas Distribution Corporation

Summary of Adjustments to Income Before Income Taxes
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount	Source
1	Operating Income per Company	$ 36,024	Exhibit LKM - 1A
2			
3	OCA Adjustments:		
4	Reflect Growth in Rent From Gas Property	$ 9	Exhibit LKM-3A Pg. 2
5	Remove Stock-Based Compensation	1,051	Exhibit LKM-3A Pg. 2
6	Amortize Insurance Settlement Proceeds	229	Exhibit LKM-3A Pg. 2
7	Remove Office Employee Inflation Adjustment	47	Exhibit LKM-3A Pg. 2
8	Remove Other Expense -Line Hit Collections	115	Exhibit LKM-3A Pg. 2
9	Remove Charge Off Of Customer A/R	108	Exhibit LKM-3A Pg. 2
10	Normalize Uncollectible Expense	54	Exhibit LKM-3A Pg. 2
11	Reflect Postage Rate Increase	129	Exhibit LKM-3A Pg. 2
12	Remove Economic Development	13	Exhibit LKM-3A Pg. 2
13	Include Customer Payment Transaction Costs	(683)	Exhibit LKM-3A Pg. 2
14	Reflect OCA Recommended Depreciation Rates	3,432	Exhibit LKM-3A Pg. 2
15	Interest Synchronization Adjustment	571	Exhibit LKM-3A Pg. 2
16	Total OCA Adjustments	5,075	
17	Total OCA Adjustments	$ 41,099	

National Fuel Gas Distribution Corporation

Summary of Adjustments to Operating Income
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Operating Revenues	O&M Expenses	Depreciation & Amortization	Taxes Other Than Income	State Income Taxes	Federal Income Taxes	Operating Income
1	Amount per Company	$ 265,524	$ 204,049	$ 25,302	$ 2,489	$ (330)	$ (2,010)	$ 36,024
2								
3	OCA Adjustments:							
4	Reflect Growth in Rent From Gas Property	$ 12	$ -	$ -	$ -	$ 1	$ 2	$ 9
5	Remove Stock-Based Compensation	-	(1,430)	-	-	100	279	1,051
6	Amortize Insurance Settlement Proceeds	-	(312)	-	-	22	61	229
7	Remove Office Employee Inflation Adjustment	-	(64)	-	-	4	13	47
8	Remove Other Expense -Line Hit Collections	-	(156)	-	-	11	30	115
9	Remove Charge Off Of Customer A/R	-	(147)	-	-	10	29	108
10	Normalize Uncollectible Expense	-	(73)	-	-	5	14	54
11	Reflect Postage Rate Increase	-	(175)	-	-	12	34	129
12	Remove Economic Development	-	(17)	-	-	1	3	13
13	Include Customer Payment Transaction Costs	-	930	-	-	(65)	(182)	(683)
14	Reflect OCA Recommended Depreciation Rates	-	-	(4,670)	-	326	912	3,432
15	Interest Synchronization Adjustment	-	-	-	-	(150)	(421)	571
16	Total OCA Adjustments	$ 12	$ (1,443)	$ (4,670)	$ -	$ 277	$ 774	$ 5,075
17	Total Adjusted Income Before Income Taxes	$ 265,536	$ 202,605	$ 20,632	$ 2,489	$ (53)	$ (1,236)	$ 41,099

National Fuel Gas Distribution Corporation
Adjustment to Cash Working Capital
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount	
1	Working Capital for O&M Expenses	$ 7,351	1/
2	Interest Payments	(1,938)	2/
3	Tax Payment Lag Calculations	158	3/
4	Prepaid Expenses	-	
5			
6	OCA Total Working Capital Requirements	$ 5,571	
7	Company Total Working Capital Requirements	6,755	3/
8	Adjustment to Cash Working Capital	$ (1,184)	

Notes
1/ Exhibit LKM-5 , Page 2
2/ Exhibit-5 , Page 3
3/ Schedule C-4, Page 1

National Fuel Gas Distribution Corporation

Summary Calculation of Cash Working Capital
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Test Year Expenses per Co.	1/ OCA Adjustments	Adjusted Test Year Expenses	Lead/Lag Days 1/	Weighted Average	Totals
	WORKING CAPITAL REQUIREMENT						
1	Revenue Lag Days						47.16
2	Expense Lag Days						
3	Purchased Gas Costs	$ 124,571	$ -	$ 124,571	39.83	$ 4,961,646	
4	Other Expenses (less Uncollectible)	35,748	(162)	35,910	41.01	1,472,666	
5	Payroll (Net Labor)	40,592	(1,430)	42,022	10.32	433,663	
6							
7	Total	$ 200,911	$ (1,591)	$ 202,502		$ 6,867,975	
8							
9	O & M Expense Lag Days						33.92
10	Net (Lead) Lag Days						13.24
11							
12	Operating Expenses Per Day						$ 555
13							
14	Working Capital for O & M Expense						$ 7,351

Notes
1/ Schedule C-4, Page 2

National Fuel Gas Distribution Corporation

Calculation of Cash Working Capital Interest Component

For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Reference Or Factor	# of Days	# of Days	Total
1	FPFTY Rate Base	Exhibit LKM - 2A			$ 574,968
2	Long-term Debt Ratio	Exhibit LKM -19A			50.00%
3	Embedded Cost of Long-term Debt	Exhibit LKM -19A			5.58%
4	Pro forma Interest Expense	L 1 * L 2 * L 3			$ 16,042
5					
6	Daily Amount	L 4 / L 5 [Col 2]	365		$ 44
7	Days to mid-point of interest payments			91.25	
8	Less: Revenue Lag Days	NFGD Schedule C-4, Page 1		47.16	
9	Interest Payment lag days	L 7 - L 6			(44.1)
10	Total Interest for Working Capital	L 5 * L 8			$ (1,938)

National Fuel Gas Distribution Corporation

Adjustment to Operating Expenses for CWC prurposes
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	Non Cash Expenses	
2	Remove Stock-Based Compensation	(1,430)
3	Injuries and Damages	(180)
4	Rate Case Expense	(344)
5	Cost of Service Adjustments	
6	Remove Office Employee Inflation Adjustment	(156)
7	Remove Other Expense -Line Hit Collections	(147)
8	Remove Charge Off Of Customer A/R	(73)
9	Reflect Postage Rate Increase	(175)
10	Remove Economic Development	(17)
	Adjustment to Include Customer Payment Transaction Costs	930
11	Total Adjustment	$ (1,591)

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Exhibit LKM -5A

National Fuel Gas Distribution Corporation

Adjustment to Reflect Contributions in Aid of Construction
and Customer Advances for Construction
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Month	Contributions in Aid of Construction 1/	Customer Advances for Construction 1/
1	Feb-25	$ 5,325	$ 61,169
2	Mar-25	8,800	60,353
3	Apr-25	-	60,353
4	May-25	17,344	60,353
5	Jun-25	15,003	60,353
6	Jul-25	22,082	60,353
7	Aug-25	-	60,353
8	Sep-25	6,000	48,645
9	Oct-25	24,350	48,645
10	Nov-25	-	48,645
11	Dec-25	480,417	48,645
12	Jan-26	-	43,874
13	Feb-26	11,038	43,058
14	Average	$ 45,412	$ 54,215
15	Adjustment to Rate Base ($000)	$ (45)	$ (54)

Notes:
1/ OCA 10-7 Attachment 1

R-2025-3059428
Exhibit LKM -6A

National Fuel Gas Distribution Corporation

Calculation of Forfieted Discount Percentage
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.		Description	Twelve Months Ended 9/30/2023	Twelve Months Ended 9/30/2024	Twelve Months Ended 9/30/2025
		Gas Service Revenue:			
1	480.0	Residential Sales	$ 200,708	$ 140,127	$ 163,839
2	481.1	Commercial Sales	31,557	20,092	25,583
3	481.2	Industrial Sales	2,745	1,460	2,054
4	481.3	Public Authority Sales	2,302	1,270	1,640
5			$ 237,311	$ 162,948	$ 193,116
6					
7	487.0	Forfeited Discounts	1,373	1,077	1,146
8					
9		Forfeited Discounts Ratio	0.579%	0.661%	0.593%
10					
11		3-Year Average			0.611%
12					
13		Calculated Increase in Revenues			$ 4,069
14					
15		Increase in Forfieted Discount relate to Revenue Increase			$ 25

Notes:
[1/] OCA 10-20

R-2025-3059428
Exhibit LKM -7A

National Fuel Gas Distribution Corporation

Adjustment to Rent From Gas Property
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	Twelve Months Ended 9/30/2023	$ 89
2	Twelve Months Ended 9/30/2024	92
3	Twelve Months Ended 9/30/2025	100
4	Average Growth Factor	1.0603
5	HTY Rent From Gas Property	$ 100
6	FTY Rent From Gas Property	$ 106
7	Average Growth Factor	1.0603
8	FPFTY Rent From Gas Property per OCA	$ 112
9	FPFTY Rent From Gas Property per NFG	100
10	Adjustment to Other Operating Revenue	$ 12

Notes:
[1/] OCA 10-20

R-2025-3059428
Exhibit LKM -8A

National Fuel Gas Distribution Corporation

Adjustment to Stock Based Compensation
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	FPFTY Stock Based Compensation Rate Year Oct. 2027	$ 1,430 [1/]
2	Adjustment to Operating Expenses	$ (1,430)

Notes:
[1/] Exhibit MPW-1, Schedule 2, Page 14.

R-2025-3059428
Exhibit LKM -9A

National Fuel Gas Distribution Corporation

Adjustment to Amortize Insurance Settlement Proceeds
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	NFG Office Employee Expense Inflation Adjustment	$ 936
2	Amortization Period	3
3	Adjustment to Operating Expenses	$ (312)

Notes:
[1/] Information Submitted Pursuant to Section 53.51 et seq of the Commission's Regulations, III-F.8, Page 2.

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Exhibit LKM -10A

National Fuel Gas Distribution Corporation

Adjustment to Office Employee Inflation Adjustment
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	NFG Office Employee Expense Inflation Adjustment	$ 64
2	Adjustment to Operating Expenses	$ (64)

Notes:
[1/] OCA 10-20

R-2025-3059428
Exhibit LKM -11A

National Fuel Gas Distribution Corporation

Adjustment to Other Expense -Line Hit Collections
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	NFG Line Hit Collection Adjustment	$ 156
2	Adjustment to Operating Expenses	$ (156)

Notes:
[1/] ATF-2, Schedule 4.

R-2025-3059428
Exhibit LKM -12A

National Fuel Gas Distribution Corporation

Adjustment to Remove Charge Off Of Customer A/R
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	Charge Off Of Customer A/R	$ 147
2	Adjustment to Operating Expenses	$ (147)

Notes:
[1/] I&E-RE-D-25.

R-2025-3059428
Exhibit LKM -13A

National Fuel Gas Distribution Corporation

Adjustment to Uncollectible Expense
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount	
1	Revenue at Presaent Rates	$ 264,263	1/
2	Uncollectible Factor	1.53%	2/
3	Uncollectible Expense per OCA Before CAP Forgiveness	$ 4,043	
4	Uncollectible Expense per NFG Before CAP Forgiveness	4,116	3/
5	Adjustment to Operating Expenses	$ (73)	

Notes:

1/ Exhibit LKM-1, Column (3), Lines 2+3.

2/ National Fuel Exhibit ATF-3, Schedule 1 (excludes Management Adj.)

3/ National Fuel Exhibit ATF-3, Schedule 1, line 9.

R-2025-3059428
Exhibit LKM -14A

National Fuel Gas Distribution Corporation

Adjustment to Postage Expense
For the Fully Projected Future Test Year Ended July 31, 2024
($ in Thousands)

Line No.	Description	Amount
1	HTY Normalized Postage Expense	$ 1,225 [1/]
2	Planned Postage Rate Increase	104.8%
3	Pro Forma Posatge Expense	$ 1,284
4	FPFTY Adjusted Postage Expense	1,459 [1/]
5	Adjustment to Operating Expenses	$ (175)

Notes:
[1/] National Fuel Exhibit ATF-1.

R-2025-3059428
Exhibit LKM -15A

National Fuel Gas Distribution Corporation

Adjustment to Remove Economic Development
Dues and Memberships
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	Economic Development Dues and Memberships	$ 17 [1/]
2	Adjustment to Operating Expenses	$ (17)

Notes:
[1/] OCA 10-34.

National Fuel Gas Distribution Corporation

Adjustment to Include Customer Payment Transaction Costs
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	Customer Payment Transaction Costs	$ 930 [1/]
2	Adjustment to Operating Expenses	$ 930

Notes:
[1/] OCA Set 7-4 attachment.

R-2025-3059428
Exhibit LKM -17A

National Fuel Gas Distribution Corporation

Adjustment to Reflect OCA Recommended Depreciation Rates
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	OCA Adjustment to Depreciation Expense	$ 4,670 [1/]
2	Adjustment to Operating Expenses	$ (4,670)
3	Adjustment to Accumulated Depreciation	$ 4,670

Notes:
[1/] OCA Set 7-4 attachment.

R-2025-3059428
Exhibit LKM -18A

National Fuel Gas Distribution Corporation

Interest Synchronization Adjustment
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount	
1	Adjusted Rate Base	$ 574,968	1/
2	Weighted Cost of Debt	2.790%	
3	Adjusted Interest Deduction	$ 16,042	
4	Interest Deduction Per Company	13,889	2/
5	Adjustment to Synchronize Interest Expense	$ 2,153	
6	Effective State Income Tax Rate	6.99%	
7	Adjustment to State Income Taxes	$ (150)	
8	Federal Income Tax Base	$ 2,003	
9	Federal Income Tax Rate	21.00%	
10	Adjustment to Federal Income Taxes	$ (421)	

Notes:
1/ Exhibit LKM-2, Page 1.
2/ Company Schedule D-11, FPFTY.

R-2025-3059428
Exhibit LKM -19A

National Fuel Gas Distribution Corporation

Calculation of Rate of Return at OCA Recommended
ROE and Capital Structure
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Capitalization Ratio	Cost Rate	Weighted Cost
1	Long-Term Debt	50.00%	5.58%	2.79%
2	Short-Term Debt	0.00%	0.00%	0.00%
3	Total Debt	50.00%		2.79%
4				
5	Common Equity	50.00%	9.74%	4.87%
6				
7	Total	100.00%		7.66%

Source:
Per OCA Witness Reno

OCA Statement 2

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION		
V.	:	DOCKET NO. 2025-3059428
NATIONAL FUEL GAS DISTRIBUTION CORPORATION PENNSYLVANIA DIVISION	:	

Exhibit LKM Set B

National Fuel Gas Distribution Corporation

Summary of Operating Income
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Company Amounts at Present Rates	OCA Adjustments	Amounts After OCA Adjustments	Pro Forma Change in Revenues	Amounts After Change in Revenues
		(1)	(2)	(3)	(4)	(5)
1	Total Operating Revenues					
2	Customer & Distribution Revenue	$ 139,680 [1/]	$ -	$ 139,680	$ -	$ 139,680
3	Gas Supply & Cost Adjustment Revenue	124,571 [1/]	12	124,583	-	124,583
4	Other Revenues	1,273 [1/]	-	1,273	28 [5/]	1,301
5	Increase in Service Revenue	-	-	-	4,505	4,505
6	Total Revenues	265,524	12	265,536	4,533 [6/]	270,069
7						
8	Total Operating Expenses					
9	Operation & Maintenance Expenses	204,049	(1,443)	202,605	69	202,675
10	Depreciation & Amortization Expense	25,302 [2/]	(4,670)	20,632	-	20,632
11	Taxes Other Than Income Taxes	2,489 [3/]	-	2,489	-	2,489
12	Total Operating Expenses	231,839 [4/]	(6,113)	225,726	69	225,795
13						
14	Operating Income Before Income Taxes	33,684	6,126	39,810	4,464	44,274
15						
16	Income Taxes:					
17	State	(330)	421	91	317	408
18	Federal	(2,010)	1,178	(832)	871	39
19	Total Income Taxes	(2,340)	1,599	(741)		447
20						
21	Net operating income Before Income Tax	$ 36,024	$ 4,527	$ 40,551	$ 4,464	$ 43,827
22						
23	Rate Base	$ 571,582		$ 575,216		$ 575,216
24						
25	Return On Rate Base	6.30%		7.05%		7.62% [6/]

Notes:

[1/] Company FPFTY Schedule A-1.

[2/] Company FPFTY Schedule D-1, Line 15.

[3/] Company FPFTY Schedule D-1, Line 16.

[4/] Company FPFTY Schedule D-1, Line 17.

[5/] Exhibit LKM -6A

[6/] Calculated at OCA Recommended ROR.

National Fuel Gas Distribution Corporation

Summary of Revenue Increase at OCA Rate of Return
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description		Amount	Source
1	Adjusted Rate Base		$ 575,216	Exhibit LKM-2, Page 1
2	Required Rate of Return		7.620%	Exhibit LKM -19B
3				
4	Net Operating Income Required		$ 43,831	
5	Net Operating Income at Present Rates		40,551	Exhibit LKM-1, Page 1
6				
7	Income Deficiency/(Surplus)		$ 3,280	
8	Revenue Multiplier		1.382099	1/
9				
10	Required Change in Company Revenue		$ 4,533	
11				
12	Proposed Revenue Change		$ 4,533	
13	Less: Uncollectible	1.53%	$ 69	
14	Less: State Income Tax	6.99%	317	
15				
16	Income Before Federal Taxes		$ 4,147	
17	Federal Income Tax	21.00%	871	
18				
19	Income Deficiency/(Surplus)		$ 3,276	

1/ Revenue Conversion Factor

Gross Revenue Factor	1.000000
Uncollectible Expense	-0.015300
State Taxable Income	0.984700
State Income Tax @6.99%	-0.068831
Federal Taxable Income	0.915869
Federal Income Tax @ 21%	-0.192332
Net Operating Income Factor	0.723537
Revenue Conversion Factor	1.382099

National Fuel Gas Distribution Corporation

Summary of Rate Base
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount per Company Filing [1/]	OCA Adjustments [2/]	Amount After OCA Adjustments
		(1)	(2)	(3)
1	Utility Plant	$ 957,237	$ -	$ 957,237
2	Accumulated Depreciation	(320,571)	4,670	(315,901)
3	Net Plant in Service	636,667	4,670	641,337
4	Working Capital	6,755	(936)	5,819
5	Gas Inventory	5,664	-	5,664
6	Accumulated Deferred Income Taxes	(73,925)	-	(73,925)
7	Customer Deposits	(5,166)	-	(5,166)
8	Contribution in Aid of Construction	-	(45)	(45)
9	Customer Advances	-	(54)	(54)
10	Materials & Supplies	1,587	-	1,587
11				
12	Total Rate Base	$ 571,582	$ 3,635	$ 575,216

Notes:
[1/] Company Schedule C-1, FPFTY.
[2/] Exhibit LKM - 2A, Page .2

National Fuel Gas Distribution Corporation

Summary of Rate Base Adjustments
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Source	Amount
1	Rate Base per Company Filing	Exhibit LKM-3B	$ 571,582
2	OCA Adjustments:		
3	Adjustment to Cash Working Capital	Exhibit LKM - 4B	(936)
4	Adjustment to Include CIAC	Exhibit LKM -5B	(45)
5	Adjustment to Include Customer Advances	Exhibit LKM -5B	(54)
6	Adjustment to Accumulated Depreciation to Reflect OCA Recommended Depreciation Rates	Exhibit LKM -17B	4,670
7			
8	Total Ratemaking Adjustments		$ 3,635
9	Adjusted Rate Base per OCA		$ 575,216

National Fuel Gas Distribution Corporation

Summary of Adjustments to Income Before Income Taxes
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount	Source
1	Operating Income per Company	$ 36,024	Exhibit LKM - 1B
2			
3	OCA Adjustments:		
4	Reflect Growth in Rent From Gas Property	$ 9	Exhibit LKM-3B Pg. 2
5	Remove Stock-Based Compensation	1,051	Exhibit LKM-3B Pg. 2
6	Amortize Insurance Settlement Proceeds	229	Exhibit LKM-3B Pg. 2
7	Remove Office Employee Inflation Adjustment	47	Exhibit LKM-3B Pg. 2
8	Remove Other Expense -Line Hit Collections	115	Exhibit LKM-3B Pg. 2
9	Remove Charge Off Of Customer A/R	108	Exhibit LKM-3B Pg. 2
10	Normalize Uncollectible Expense	54	Exhibit LKM-3B Pg. 2
11	Reflect Postage Rate Increase	129	Exhibit LKM-3B Pg. 2
12	Remove Economic Development	13	Exhibit LKM-3B Pg. 2
13	Include Customer Payment Transaction Costs	(683)	Exhibit LKM-3B Pg. 2
14	Reflect OCA Recommended Depreciation Rates	3,432	Exhibit LKM-3B Pg. 2
15	Interest Synchronization Adjustment	23	Exhibit LKM-3B Pg. 2
16	Total OCA Adjustments	4,527	
17	Total OCA Adjustments	$ 40,551	

National Fuel Gas Distribution Corporation

Summary of Adjustments to Operating Income
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Operating Revenues	O&M Expenses	Depreciation & Amortization	Taxes Other Than Income	State Income Taxes	Federal Income Taxes	Operating Income
1	Amount per Company	$ 265,524	$ 204,049	$ 25,302	$ 2,489	$ (330)	$ (2,010)	$ 36,024
2								
3	OCA Adjustments:							
4	Reflect Growth in Rent From Gas Property	$ 12	$ -	$ -	$ -	$ 1	$ 2	$ 9
5	Remove Stock-Based Compensation	-	(1,430)	-	-	100	279	1,051
6	Amortize Insurance Settlement Proceeds	-	(312)	-	-	22	61	229
7	Remove Office Employee Inflation Adjustment	-	(64)	-	-	4	13	47
8	Remove Other Expense -Line Hit Collections	-	(156)	-	-	11	30	115
9	Remove Charge Off Of Customer A/R	-	(147)	-	-	10	29	108
10	Normalize Uncollectible Expense	-	(73)	-	-	5	14	54
11	Reflect Postage Rate Increase	-	(175)	-	-	12	34	129
12	Remove Economic Development	-	(17)	-	-	1	3	13
13	Include Customer Payment Transaction Costs	-	930	-	-	(65)	(182)	(683)
14	Reflect OCA Recommended Depreciation Rates	-	-	(4,670)	-	326	912	3,432
15	Interest Synchronization Adjustment	-	-	-	-	(6)	(17)	23
16	Total OCA Adjustments	$ 12	$ (1,443)	$ (4,670)	$ -	$ 421	$ 1,178	$ 4,527
17	Total Adjusted Income Before Income Taxes	$ 265,536	$ 202,605	$ 20,632	$ 2,489	$ 91	$ (832)	$ 40,551

National Fuel Gas Distribution Corporation
Adjustment to Cash Working Capital
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount	
1	Working Capital for O&M Expenses	$ 7,351	1/
2	Interest Payments	(1,690)	2/
3	Tax Payment Lag Calculations	158	3/
4	Prepaid Expenses	-	
5			
6	OCA Total Working Capital Requirements	$ 5,819	
7	Company Total Working Capital Requirements	6,755	3/
8	Adjustment to Cash Working Capital	$ (936)	

Notes
1/ Exhibit LKM-5 , Page 2
2/ Exhibit-5 , Page 3
3/ Schedule C-4, Page 1

National Fuel Gas Distribution Corporation

Summary Calculation of Cash Working Capital
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Test Year Expenses per Co.	1/ OCA Adjustments	Adjusted Test Year Expenses	Lead/Lag Days 1/	Weighted Average	Totals
	WORKING CAPITAL REQUIREMENT						
1	Revenue Lag Days						47.16
2	Expense Lag Days						
3	Purchased Gas Costs	$ 124,571	$ -	$ 124,571	39.83	$ 4,961,646	
4	Other Expenses (less Uncollectible)	35,748	(162)	35,910	41.01	1,472,666	
5	Payroll (Net Labor)	40,592	(1,430)	42,022	10.32	433,663	
6							
7	Total	$ 200,911	$ (1,591)	$ 202,502		$ 6,867,975	
8							
9	O & M Expense Lag Days						33.92
10	Net (Lead) Lag Days						13.24
11							
12	Operating Expenses Per Day						$ 555
13							
14	Working Capital for O & M Expense						$ 7,351

Notes
1/ Schedule C-4, Page 2

National Fuel Gas Distribution Corporation

Calculation of Cash Working Capital Interest Component

For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Reference Or Factor	# of Days	# of Days	Total
1	FPFTY Rate Base	Exhibit LKM - 2B			$ 575,216
2	Long-term Debt Ratio	Exhibit LKM -19B			43.60%
3	Embedded Cost of Long-term Debt	Exhibit LKM -19B			5.58%
4	Pro forma Interest Expense	L 1 * L 2 * L 3			$ 13,994
5					
6	Daily Amount	L 4 / L 5 [Col 2]	365		$ 38
7	Days to mid-point of interest payments			91.25	
8	Less: Revenue Lag Days	NFGD Schedule C-4, Page 1		47.16	
9	Interest Payment lag days	L 7 - L 6			(44.1)
10	Total Interest for Working Capital	L 5 * L 8			$ (1,690)

National Fuel Gas Distribution Corporation

Adjustment to Operating Expenses for CWC prurposes
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	Non Cash Expenses	
2	Remove Stock-Based Compensation	(1,430)
3	Injuries and Damages	(180)
4	Rate Case Expense	(344)
5	Cost of Service Adjustments	
6	Remove Office Employee Inflation Adjustment	(156)
7	Remove Other Expense -Line Hit Collections	(147)
8	Remove Charge Off Of Customer A/R	(73)
9	Reflect Postage Rate Increase	(175)
10	Remove Economic Development	(17)
	Adjustment to Include Customer Payment Transaction Costs	930
11	Total Adjustment	$ (1,591)

R-2025-3059428
Exhibit LKM -5B

National Fuel Gas Distribution Corporation

Adjustment to Reflect Contributions in Aid of Construction
and Customer Advances for Construction
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Month	Contributions in Aid of Construction [1/]	Customer Advances for Construction [1/]
1	Feb-25	$ 5,325	$ 61,169
2	Mar-25	8,800	60,353
3	Apr-25	-	60,353
4	May-25	17,344	60,353
5	Jun-25	15,003	60,353
6	Jul-25	22,082	60,353
7	Aug-25	-	60,353
8	Sep-25	6,000	48,645
9	Oct-25	24,350	48,645
10	Nov-25	-	48,645
11	Dec-25	480,417	48,645
12	Jan-26	-	43,874
13	Feb-26	11,038	43,058
14	Average	$ 45,412	$ 54,215
15	Adjustment to Rate Base ($000)	$ (45)	$ (54)

Notes:
[1/] OCA 10-7 Attachment 1

R-2025-3059428
Exhibit LKM -6B

National Fuel Gas Distribution Corporation

Calculation of Forfieted Discount Percentage
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.		Description	Twelve Months Ended 9/30/2023	Twelve Months Ended 9/30/2024	Twelve Months Ended 9/30/2025
		Gas Service Revenue:			
1	480.0	Residential Sales	$ 200,708	$ 140,127	$ 163,839
2	481.1	Commercial Sales	31,557	20,092	25,583
3	481.2	Industrial Sales	2,745	1,460	2,054
4	481.3	Public Authority Sales	2,302	1,270	1,640
5			$ 237,311	$ 162,948	$ 193,116
6					
7	487.0	Forfeited Discounts	1,373	1,077	1,146
8					
9		Forfeited Discounts Ratio	0.579%	0.661%	0.593%
10					
11		3-Year Average			0.611%
12					
13		Calculated Increase in Revenues			$ 4,533
14					
15		Increase in Forfieted Discount relate to Revenue Increase			$ 28

Notes:
[1/] OCA 10-20

R-2025-3059428
Exhibit LKM -7B

National Fuel Gas Distribution Corporation

Adjustment to Rent From Gas Property
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	Twelve Months Ended 9/30/2023	$ 89
2	Twelve Months Ended 9/30/2024	92
3	Twelve Months Ended 9/30/2025	100
4	Average Growth Factor	1.0603
5	HTY Rent From Gas Property	$ 100
6	FTY Rent From Gas Property	$ 106
7	Average Growth Factor	1.0603
8	FPFTY Rent From Gas Property per OCA	$ 112
9	FPFTY Rent From Gas Property per NFG	100
10	Adjustment to Other Operating Revenue	$ 12

Notes:
[1/] OCA 10-20

R-2025-3059428
Exhibit LKM -8B

National Fuel Gas Distribution Corporation

Adjustment to Stock Based Compensation
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	FPFTY Stock Based Compensation Rate Year Oct. 2027	$ 1,430 [1/]
2	Adjustment to Operating Expenses	$ (1,430)

Notes:
[1/] Exhibit MPW-1, Schedule 2, Page 14.

R-2025-3059428
Exhibit LKM -9B

National Fuel Gas Distribution Corporation

Adjustment to Amortize Insurance Settlement Proceeds
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	NFG Office Employee Expense Inflation Adjustment	$ 936
2	Amortization Period	3
3	Adjustment to Operating Expenses	$ (312)

Notes:
[1/] Information Submitted Pursuant to Section 53.51 et seq of the Commission's Regulations, III-F.8, Page 2.

R-2025-3059428
Exhibit LKM -10B

National Fuel Gas Distribution Corporation

Adjustment to Office Employee Inflation Adjustment
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	NFG Office Employee Expense Inflation Adjustment	$ 64
2	Adjustment to Operating Expenses	$ (64)

Notes:
[1/] OCA 10-20

R-2025-3059428
Exhibit LKM -11B

National Fuel Gas Distribution Corporation

Adjustment to Other Expense -Line Hit Collections
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	NFG Line Hit Collection Adjustment	$ 156
2	Adjustment to Operating Expenses	$ (156)

Notes:
[1/] ATF-2, Schedule 4.

R-2025-3059428
Exhibit LKM -12B

National Fuel Gas Distribution Corporation

Adjustment to Remove Charge Off Of Customer A/R
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	Charge Off Of Customer A/R	$ 147
2	Adjustment to Operating Expenses	$ (147)

Notes:
[1/] I&E-RE-D-25.

R-2025-3059428
Exhibit LKM -13B

National Fuel Gas Distribution Corporation

Adjustment to Uncollectible Expense
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount	
1	Revenue at Presaent Rates	$ 264,263	1/
2	Uncollectible Factor	1.53%	2/
3	Uncollectible Expense per OCA Before CAP Forgiveness	$ 4,043	
4	Uncollectible Expense per NFG Before CAP Forgiveness	4,116	3/
5	Adjustment to Operating Expenses	$ (73)	

Notes:

1/ Exhibit LKM-1, Column (3), Lines 2+3.

2/ National Fuel Exhibit ATF-3, Schedule 1 (excludes Management Adj.)

3/ National Fuel Exhibit ATF-3, Schedule 1, line 9.

R-2025-3059428
Exhibit LKM -14B

National Fuel Gas Distribution Corporation

Adjustment to Postage Expense
For the Fully Projected Future Test Year Ended July 31, 2024
($ in Thousands)

Line No.	Description	Amount
1	HTY Normalized Postage Expense	$ 1,225 [1/]
2	Planned Postage Rate Increase	104.8%
3	Pro Forma Posatge Expense	$ 1,284
4	FPFTY Adjusted Postage Expense	1,459 [1/]
5	Adjustment to Operating Expenses	$ (175)

Notes:
[1/] National Fuel Exhibit ATF-1.

R-2025-3059428
Exhibit LKM -15B

National Fuel Gas Distribution Corporation

Adjustment to Remove Economic Development
Dues and Memberships
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	Economic Development Dues and Memberships	$ 17 [1/]
2	Adjustment to Operating Expenses	$ (17)

Notes:
[1/] OCA 10-34.

R-2025-3059428
Exhibit LKM -16B

National Fuel Gas Distribution Corporation

Adjustment to Include Customer Payment Transaction Costs
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	Customer Payment Transaction Costs	$ 930 [1/]
2	Adjustment to Operating Expenses	$ 930

Notes:
[1/] OCA Set 7-4 attachment.

R-2025-3059428
Exhibit LKM -17B

National Fuel Gas Distribution Corporation

Adjustment to Reflect OCA Recommended Depreciation Rates
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	OCA Adjustment to Depreciation Expense	$ 4,670 [1/]
2	Adjustment to Operating Expenses	$ (4,670)
3	Adjustment to Accumulated Depreciation	$ 4,670

Notes:
[1/] OCA Set 7-4 attachment.

R-2025-3059428
Exhibit LKM -18B

National Fuel Gas Distribution Corporation

Interest Synchronization Adjustment
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount	
1	Adjusted Rate Base	$ 575,216	1/
2	Weighted Cost of Debt	2.430%	
3	Adjusted Interest Deduction	$ 13,978	
4	Interest Deduction Per Company	13,889	2/
5	Adjustment to Synchronize Interest Expense	$ 89	
6	Effective State Income Tax Rate	6.99%	
7	Adjustment to State Income Taxes	$ (6)	
8	Federal Income Tax Base	$ 83	
9	Federal Income Tax Rate	21.00%	
10	Adjustment to Federal Income Taxes	$ (17)	

Notes:
1/ Exhibit LKM-2, Page 1.
2/ Company Schedule D-11, FPFTY.

R-2025-3059428
Exhibit LKM -19B

National Fuel Gas Distribution Corporation

Calculation of Rate of Return at OCA Recommended
ROE and Capital Structure
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Capitalization Ratio	Cost Rate	Weighted Cost
1	Long-Term Debt	43.60%	5.58%	2.43%
2	Short-Term Debt	0.00%	0.00%	0.00%
3	Total Debt	43.60%		2.43%
4				
5	Common Equity	56.40%	9.21%	5.19%
6				
7	Total	100.00%		7.62%

Source:
Per OCA Witness Reno

OCA Statement 2

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION		
V.	:	DOCKET NO. 2025-3059428
NATIONAL FUEL GAS DISTRIBUTION CORPORATION PENNSYLVANIA DIVISION		

DIRECT TESTIMONY
OF
LAFAYETTE K. MORGAN, JR.

Appendix A

LAFAYETTE K. MORGAN, JR.

Mr. Morgan is an independent regulatory consultant focusing in the area of the analysis of the operations of public utilities with particular emphasis on rate regulation. He has reviewed and analyzed utility rate filings, focusing primarily on revenue requirements determination, accounting and regulatory policy and cost recovery mechanisms. This work has included natural gas, water, electric, and telephone utilities.

Education and Qualifications

B.B.A. (Accounting) – North Carolina Central University, 1983

M.B.A. (Finance) – The George Washington University, 1993

C.P.A. – Licensed in the State of North Carolina (Inactive status)

Previous Employment

1993-2010	Senior Regulatory Analyst Exeter Associates, Inc. Columbia, MD
1990-1993	Senior Financial Analyst Potomac Electric Power Company Washington, D.C.
1984-1990	Staff Accountant North Carolina Utilities Commission – Public Staff Raleigh, NC

Professional Experience

As a Staff Accountant with the North Carolina Utilities Commission – Public Staff, Mr. Morgan was responsible for analyzing testimony, exhibits, and other data presented by parties before the Commission. In addition, he performed examinations of the books and records of utilities involved in rate proceedings and summarized the results into testimony and exhibits for presentation before the Commission. Mr. Morgan also participated in several policy proceedings and audits involving regulated utilities.

As a Senior Financial Analyst with Potomac Electric Power Company, Mr. Morgan was a lead analyst and was involved in the preparation of the cost of service, rate base, and ratemaking adjustments supporting the Company's request for revenue increases in its retail jurisdictions.

As a Senior Regulatory Analyst with Exeter Associates, Inc., Mr. Morgan has been involved in the analysis of the operations of public utilities with particular emphasis on rate regulation. He has reviewed and analyzed utility rate filings, focusing primarily on revenue requirements determination, accounting and regulatory policy and cost recovery mechanisms. This work included natural gas, water, electric, and telephone utilities.

Kings Grant Water Company (North Carolina Utilities Commission, Docket No. W-250, Sub 5), 1984. Presented testimony on rate base, cost of service, and revenue and expense adjustments on behalf of the North Carolina Utilities Commission – Public Staff.

Northwood Water Company (North Carolina Utilities Commission, Docket No. W-690, Sub 1), 1985. Presented testimony on rate base, cost of service, and revenue and expense adjustments on behalf of the North Carolina Utilities Commission – Public Staff.

Emerald Village Water System (North Carolina Utilities Commission, Docket No. W-184, Sub 3), 1985. Presented testimony on rate base, cost of service, and revenue and expense adjustments on behalf of the North Carolina Utilities Commission – Public Staff.

General Telephone Company of the South (North Carolina Utilities Commission, Docket No. P-19, Sub 207), July 1986. Presented testimony on the level of cash working capital allowance on behalf of the North Carolina Utilities Commission – Public Staff.

Heins Telephone Company (North Carolina Utilities Commission, Docket No. P-26, Sub 93), November 1986. Presented testimony on rate base, cost of service, and revenue and expense adjustments on behalf of the North Carolina Utilities Commission – Public Staff.

Carolina Power and Light Company (North Carolina Utilities Commission, Docket No. E-2, Sub 537), March 1988. Presented testimony on rate base, cost of service, and revenue and expense adjustments on behalf of the North Carolina Utilities Commission – Public Staff.

Public Service Company of North Carolina, Inc. (North Carolina Utilities Commission, Docket No. G-5, Sub 246), August 1989. Presented testimony on rate base, cash working capital allowance, cost of service, and revenue and expense adjustments on behalf of the North Carolina Utilities Commission – Public Staff.

Conestoga Telephone and Telegraph Company (Pennsylvania Public Utility Commission, Docket No. I-00920015), September 1993. Presented testimony on cost of service on behalf of the Pennsylvania Office of Consumer Advocate.

Louisiana Power and Light Company (Louisiana Public Service Commission, Docket No. U-20925), February 1995. Presented testimony on rate base and working capital issues on behalf of the Louisiana Public Service Commission Staff.

South Central Bell Telephone Company – Louisiana (Louisiana Public Service Commission, Docket No. U-17949, Subdocket E), June 1995. Presented testimony on rate base and working capital issues on behalf of the Louisiana Public Service Commission Staff.

Apollo Gas Company (Pennsylvania Public Utility Commission, Docket No. R-00953378), August 1995. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

Carnegie Natural Gas Company (Pennsylvania Public Utility Commission, Docket No. R-00953379), August 1995. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

Tennessee Gas Pipeline Company (Federal Energy Regulatory Commission, Docket No. RP95-112), September 1995. Presented testimony rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

Virginia-American Water Company (Virginia State Corporation Commission, Case No. PUE-950003), March 1996. Presented testimony on rate base and cost of service issues on behalf of the City of Alexandria.

GTE North, Inc. Interconnection Arbitration (Pennsylvania Public Utility Commission, Docket No. A-310125F0002), September 1996. Presented testimony on the determination of the appropriate resale discount on behalf of the Pennsylvania Office of Consumer Advocate.

United Cities Gas Company (Georgia Public Service Commission, Docket No. 6691-U), October 1996. Presented testimony on rate base and cost of service issues on behalf of the Office of Governor, Consumer Utility Counsel Division.

GTE North, Inc. (Pennsylvania Public Utility Commission, Docket Nos. R-00963666 and R-00963666C001), February 1997. Presented testimony on the determination of the appropriate resale discount on behalf of the Pennsylvania Office of Consumer Advocate.

Consumers Maine Water Company (Maine Public Utilities Commission, Docket No. 96-739), May 1997. Presented testimony on rate base, cost of service, and rate of return issues on behalf of the Maine Office of the Public Advocate.

Pennsylvania-American Water Company (Pennsylvania Public Utility Commission, Docket No. R-00973944), July 1997. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

Pennsylvania-American Water Company – Wastewater Operations (Pennsylvania Public Utility Commission, Docket No. R-00973973), July 1997. Presented testimony on rate base, cost of service, depreciation, and rate design issues on behalf of the Pennsylvania Office of Consumer Advocate.

Jackson Purchase Electric Cooperative Corporation (Kentucky Public Service Commission, Case No. 97-224), December 1997. Presented testimony on rate base and cost of service issues on behalf of the Kentucky Office of the Attorney General.

Henderson Union Electric Cooperative Corporation (Kentucky Public Service Commission, Case No. 97-220), January 1998. Presented testimony on the return of patronage capital on behalf of the Kentucky Office of the Attorney General.

Green River Electric Corporation (Kentucky Public Service Commission, Case No. 97-219), January 1998. Presented testimony on the return of patronage capital on behalf of the Kentucky Office of the Attorney General.

Western Kentucky Gas Company (Kentucky Public Service Commission, Case No. 99-070), November 1999. Presented testimony on rate base and cost of service issues on behalf of the Kentucky Office of the Attorney General.

American Broadband, Inc. (Rhode Island Public Utilities Commission, Docket No. 2000-C-3), June 2000. Presented report and testimony on the Company's financing plan on behalf of the Rhode Island Division of Public Utilities and Carriers.

PPL Utilities (Pennsylvania Public Utility Commission, Docket No. R-00005277), October 2000. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

T.W. Phillips Oil and Gas Company (Pennsylvania Public Utility Commission, Docket No. R-00005459), October 2000. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

Pike County Light & Power Company (Pennsylvania Public Utility Commission, Docket No. P-00011872), May 2001. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

Vermont Gas Systems, Inc. (Vermont Public Service Board, Docket No. 6495), June 2001. Presented testimony on rate base and cost of service issues on behalf of the Vermont Public Service Department.

Community Service Telephone Company (Maine Public Utilities Commission, Docket No. 2001-249), July 2001. Presented joint testimony on rate base and cost of service issues on behalf of the Maine Office of the Public Advocate.

West Virginia-American Water Company (Public Service Commission of West Virginia, Docket No. 01-0326-W-42-T), August 2001. Presented testimony on rate base and cost of service issues on behalf of the Consumer Advocate Division.

Philadelphia Suburban Water Company (Pennsylvania Public Utility Commission, Docket No. R-00016750) February 2002. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

Illinois-American Water Company (Illinois Commerce Commission, Docket No. 02-0690) January 2003. Presented testimony on cost of service issues on behalf of Citizens Utility Board.

Pennsylvania-American Water Company (Pennsylvania Public Utility Commission, Docket No. R-00027983), February 2003. Presented testimony addressing surcharge mechanism to recover security costs on behalf of the Pennsylvania Office of Consumer Advocate.

FairPoint New England Telephone Companies (Maine Public Utilities Commission, Docket Nos. 2002-747, 2003-34, 2003-35, 2003-36, and 2003-37), June 2003. Presented testimony on rate base and cost of service issues on behalf of the Maine Office of the Public Advocate.

Pennsylvania-American Water Company (Pennsylvania Public Utility Commission, Docket No. R-00038304), August 2003. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

PPL Electric Utilities Corporation (Pennsylvania Public Utility Commission, Docket No. R-00049255), June 2004. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

Entergy Louisiana, Inc. (Louisiana Public Service Commission, Docket No. U-20925 RRF 2004), August 2004. Presented testimony on rate base and cost of service issues on behalf of the Louisiana Public Service Commission Staff.

Vectren Energy Delivery of Indiana (Indiana Utility Regulatory Commission, Cause No. 42598), September 2004. Presented testimony on O&M expense issues on behalf of the Indiana Office of Utility Consumer Counselor.

National Fuel Gas Distribution Corporation (Pennsylvania Public Utility Commission, Docket No. R-00049656), December 2004. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

Block Island Power Company (Rhode Island Public Utilities Commission, Docket No. 3655), April 2005. Presented testimony on cash working capital on behalf of the Rhode Island Division of Public Utilities & Carriers.

Verizon New England, Inc. (Maine Public Utilities Commission, Docket No. 2005-155), September 2005. Presented joint testimony with Thomas S. Catlin on rate base and cost of service issues on behalf of the Maine Office of the Public Advocate.

T.W. Phillips Oil and Gas Company (Pennsylvania Public Utility Commission, Docket No. R-00051178), May 2006. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

Duquesne Light Company (Pennsylvania Public Utility Commission, Docket No. R-00061346), July 2006. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

National Fuel Gas Distribution Company (Pennsylvania Public Utility Commission, Docket No. R-00061493), September 2006. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

Southern Indiana Gas & Electric Co. (Indiana Utility Regulatory Commission, Cause No. 43112), January 2007. Presented testimony on rate base and cost of service issues on behalf of the Indiana Office of Utility Consumer Counsel.

PPL Electric Utilities (Pennsylvania Public Utility Commission, Docket No. R-00072155), July 2007. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

Aqua Pennsylvania, Inc. (Pennsylvania Public Utility Commission, Docket No. R-00072711), February 2008. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

Equitable Gas Company (Pennsylvania Public Utility Commission, Docket No. R-2008-2029325), October 2008. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

The Narragansett Bay Commission (Rhode Island Public Utilities Commission, Docket No. 4026), April 2009. Presented testimony on rate base and cost of service issues on behalf of the Rhode Island Division of Public Utilities and Carriers.

Maryland-American Water Company (Maryland Public Service Commission, Case No. 9187), July 2009. Presented testimony on rate base and cost of service issues on behalf of the Maryland Office of People's Counsel.

Monongahela Power Company & The Potomac Edison Company, both d/b/a Allegheny Power Company (West Virginia Public Service Commission, Case No. 09-1352-E-42T), February 2010. Presented testimony on rate base and cost of service issues on behalf of the West Virginia Consumer Advocate Division.

PPL Electric Utilities (Pennsylvania Public Utility Commission, Docket No. R-2010-2161694), June 2010. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

Pawtucket Water Supply Board (Rhode Island Public Utilities Commission, Docket No. 4550), June 2015. Presented testimony on revenue requirements issues on behalf of the Rhode Island Division of Public Utilities and Carriers.

Columbia Gas of Pennsylvania (Pennsylvania Public Utility Commission, Docket No. R-2015-2468056), June 2015. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

Indianapolis Power and Light Company (Indiana Utility Regulatory Commission, Cause No. 44576/44602), July 2015. Presented testimony on revenue requirements issues on behalf of the Indiana Office of Utility Consumer Counselor.

Public Service Company of Oklahoma (Corporation Commission of Oklahoma, Cause No. PUD 201500208), October 2015. Presented testimony on revenue requirements and environmental compliance rider issues on behalf of the United States Department of Defense and the Federal Executive Agencies.

Northern Indiana Public Service Company (Indiana Utility Regulatory Commission, Cause No. 44688), January 2016. Presented testimony on the company's electric division operating revenues, operating expenses and income taxes issues on behalf of the Indiana Office of Utility Consumer Counselor.

Philadelphia Water Department (Philadelphia Water, Sewer And Storm Water Rate Board, FY2017-2018 Rate Proceeding), March 2016. Presented testimony on revenue requirements issues on behalf of the Public Advocate.

Columbia Gas of Maryland (Public Service Commission of Maryland, Case No. 9417), June 2016. Presented testimony on rate base and cost of service issues on behalf of the Office of People's Counsel.

Chesapeake Utilities Corporation (Delaware Public Service Commission, PSC Docket No. 15-1734), August 2016. Presented testimony on rate base and cost of service issues on behalf of the Staff of the Delaware Public Service Commission.

Kent County Water Authority (Public Service Commission of Rhode Island, Docket No. 4611), September 2016. Presented testimony on rate base and cost of service issues on behalf of the Division of Public Utilities and Carriers.

Northern Utilities, Inc. (Maine Public Utilities Commission, Docket No. 2017-00065), August 2017. Assisted the Maine Office of Public Advocate (OPA) with Northern Utilities application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OPA, on accounting issues including test year revenue requirements, the utility's request to renew and modify its alternative rate plan, and its Targeted Infrastructure Replacement Adjustment.

Indiana Michigan Power Company (Indiana Utility Regulatory Commission, Cause No. 44967), November 2017. Presented testimony on rate base, operating revenues and operating expenses issues on behalf of the Indiana Office of Utility Consumer Counselor.

Emera Maine (Maine Public Utilities Commission, Docket No. 2017-00198), December 2017. Assisted the Maine Office of Public Advocate (OPA) with Emera Maine's application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OPA, on accounting issues including test year revenue requirements, the utility's request to reflect the changes brought about by the Tax Change and Jobs Act of 2017.

UGI-Electric (Pennsylvania Public Utility Commission, Docket No. R-2017-2640058), April 2018. Assisted the Pennsylvania Office of Consumer Advocate (OCA) with UGI-Electric's application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OCA, on accounting issues including test year revenue requirements, the utility's request to reflect the changes brought about by the Tax Change and Jobs Act of 2017.

Philadelphia Water Department (Philadelphia Water, Sewer And Storm Water Rate Board, FY2019-2020 Rate Proceeding), April 2018. Presented testimony on revenue requirements and the Department's three-year rate plan issues on behalf of the Public Advocate.

Westar Energy, Inc. (Westar Energy) and Kansas Gas and Electric Company (KGE), (Kansas State Corporation Commission, Docket No. 18-WSEE-328-RTS), May 2018. Presented testimony on revenue requirements on behalf of the Federal Executive Agencies.

Duquesne Light Company (Pennsylvania Public Utility Commission, Docket No. R-2018-3000124), June 2018. Assisted the Pennsylvania Office of Consumer Advocate (OCA) with UGI-Electric's application for an increase in rates. Presented testimony, on behalf of the OCA, on accounting issues including test year revenue requirements, the utility's request to reflect the changes brought about by the Tax Change and Jobs Act of 2017.

Bangor Natural Gas Company (Maine Public Utilities Commission, Docket No. 2018-00007), June 2018. Assisted the Maine Office of Public Advocate (OPA) Presented testimony, on behalf of the OPA, on the changes brought about by the Tax Change and Jobs Act of 2017.

SUEZ Water Pennsylvania, Inc. (Pennsylvania Public Utility Commission, R-2018-3000834), July 2018. Assisted the Pennsylvania Office of Consumer Advocate (OCA) with SUEZ Water's application for an increase in rates. Presented testimony, on behalf of the OCA, on accounting issues including Rate Base, Operating Income, Inclusion of Costs Related to Expansion Territories and the utility's request to reflect the changes brought about by the Tax Change and Jobs Act of 2017.

Woonsocket Water Division (Public Service Commission of Rhode Island, Docket No. 4879), January 2019. Presented testimony on cost of service issues on behalf of the Division of Public Utilities and Carriers.

Central Maine Power Company (Maine Public Utilities Commission, Docket No. 2018-00194), January 2019. Assisted the Maine Office of Public Advocate (OPA) with Central Maine Power's application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OPA, on accounting issues including test year revenue requirements, the utility's request to reflect the changes brought about by the Tax Change and Jobs Act of 2017.

Philadelphia Water Department (Philadelphia Water, Sewer and Storm Water Rate Board, 2019 Tiered Assistance Program Rate Rider Surcharge Rates Proceeding), May 2019. Presented testimony regarding the appropriate adjustments to the 2019 TAP-R determination. Presented testimony on behalf of the Public Advocate.

Newport Water Department (Public Service Commission of Rhode Island, Docket No. 4933), July 2019. Presented testimony on cost of service issues on behalf of the Division of Public Utilities and Carriers.

UGI-Gas (Pennsylvania Public Utility Commission, Docket No. R-2018-3006814), April 2019. Assisted the Pennsylvania Office of Consumer Advocate (OCA) with UGI-Gas' application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OCA, on accounting issues including Rate Base and Net Operating Income.

Columbia Gas of Maryland (Public Service Commission of Maryland, Case No. 9609), August 2019. Presented testimony on rate base and cost of service issues on behalf of the Office of People's Counsel.

Public Service Company of Colorado (Colorado Public Utility Commission, Proceeding No. 19AL-0268E), September 2019. Mr. Morgan provided testimony, on behalf of the Department of Energy and the Federal Executive Agencies, on accounting issues including test year revenue requirements, Rate Base and Net Operating Income.

Northern Utilities, Inc. (Maine Public Utilities Commission, Docket No. 2019-00092), September 2019. Assisted the Maine Office of Public Advocate (OPA) with Northern Utilities application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OPA, on accounting issues including test year revenue requirements and the utility's request to institute a Capital Investment Recovery Mechanism.

Citizens' Electric Company of Lewisburg (Pennsylvania Public Utility Commission, Docket No. R-2019-3008212), October 2019. Provided testimony on Plant in Service, Construction Work in Progress, Materials and Supplies, Customer Deposits, Depreciation Expense, Growth Factor, and The Tax Cuts and Jobs Act. Mr. Morgan provided testimony on behalf of the Pennsylvania Office of Consumer Advocate (OCA).

Valley Energy, Inc. (Pennsylvania Public Utility Commission, Docket No. R-2019-3008209), October 2019. Provided testimony on Plant in Service, Construction Work in Progress, Materials and Supplies, Customer Deposits, Depreciation Expense, Growth Factor, and The Tax Cuts and Jobs Act. Mr. Morgan provided testimony on behalf of the Pennsylvania Office of Consumer Advocate (OCA).

Wellsboro Electric Company (Pennsylvania Public Utility Commission, Docket No. R-2019-3008208), October 2019. Provided testimony on Plant in Service, Construction Work in Progress, Materials and Supplies, Customer Deposits, Depreciation Expense, Growth Factor,

and The Tax Cuts and Jobs Act. Mr. Morgan provided testimony on behalf of the Pennsylvania Office of Consumer Advocate (OCA).

Blue Granite Water Company (Public Service Commission of South Carolina, (Docket No. 2019-290-WS), January 2020. Assisted the South Carolina Department of Consumer Affairs. Presented testimony on accounting policy issues including test year revenue requirements.

UGI-Gas (Pennsylvania Public Utility Commission, Docket No. R-2019-3015162), May 2020. Assisted the Pennsylvania Office of Consumer Advocate (OCA) with UGI-Gas' application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OCA, on accounting issues including Rate Base and Net Operating Income.

Columbia Gas of Maryland (Public Service Commission of Maryland, Case No. 9644), July 2020. Presented testimony on rate base and cost of service issues on behalf of the Office of People's Counsel.

PECO Energy Company - Gas Division (Pennsylvania Public Utility Commission, Docket No. R-2020-3018929), December 2020. Assisted the Pennsylvania Office of Consumer Advocate (OCA) with PECO-Gas' application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OCA, on accounting issues including Rate Base and Net Operating Income.

Philadelphia Water Department (Philadelphia Water, Sewer and Storm Water Rate Board, Fiscal Years 2022 - 2023 Rates Proceeding), March 2021. Presented testimony on revenue requirements and the Department's three-year rate plan issues on behalf of the Public Advocate.

Versant Maine (Maine Public Utilities Commission, Docket No. 2020-00316), April 2021. Assisted the Maine Office of Public Advocate (OPA) with Versant's application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OPA, on accounting issues including test year revenue requirements.

Maine Water Company (Maine Public Utilities Commission, Docket No. 2021-00053), April 2021. Assisted the Maine Office of Public Advocate (OPA) with Maine Water Company's Request for Approval of Rate Increase and Rate Smoothing Mechanism Pertaining to The Maine Water Company Biddeford & Saco Division. Mr. Morgan provided testimony, on the authorization of the Rate Smoothing Mechanism.

UGI-Electric (Pennsylvania Public Utility Commission, Docket No. R-2021-3023618), May 2021. Assisted the Pennsylvania Office of Consumer Advocate (OCA) with UGI-Electric's application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OCA, on accounting issues including Rate Base and Net Operating Income.

Bangor Natural Gas Company (Maine Public Utilities Commission, Docket No. 2021-00024), June 2021. Assisted the Maine Office of Public Advocate (OPA) with Bangor Natural Gas' application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OPA, on accounting issues including test year revenue requirements.

Philadelphia Gas Works (Philadelphia Gas Commission, Fiscal Year 2021 - 2022 Operating Budget Proceeding), June 2021. Presented testimony on the reasonableness of the Fiscal Year 2022 Operating Budget on behalf of the Public Advocate.

Duquesne Light Company (Pennsylvania Public Utility Commission, Docket No. R-2021-3024750), June 2021. Assisted the Pennsylvania Office of Consumer Advocate (OCA) with Duquesne Light Company's application for an increase in rates. Presented testimony, on behalf of the OCA, on accounting issues including test year revenue requirements.

Columbia Gas of Maryland (Public Service Commission of Maryland, Case No. 9664), July 2021. Presented testimony on rate base and cost of service issues on behalf of the Office of People's Counsel.

Palmetto Wastewater Reclamation, Inc. (Public Service Commission of South Carolina, (Docket No. 2021-153-S), September 2021. Assisted the South Carolina Department of Consumer Affairs. Presented testimony on accounting policy issues including test year revenue requirements.

Maine Water Company (Maine Public Utilities Commission, Docket No. 2021-00289), November 2021. Assisted the Maine Office of Public Advocate (OPA) with Maine Water Company's application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OPA, on accounting issues including test year revenue requirements.

City of Lancaster – Water Department (Pennsylvania Public Utility Commission, Docket No. R-2021-3026682), December 2021. Assisted the Pennsylvania Office of Consumer Advocate (OCA) with the City of Lancaster – Water Department's application for an increase in rates. Presented testimony, on behalf of the OCA, on accounting issues including test year revenue requirements.

Maryland Water Service (Public Service Commission of Maryland, Case No. 9671), January 2022. Presented testimony on rate base and cost of service issues on behalf of the Office of People's Counsel.

Commonwealth Edison Company (Illinois Commerce Commission, ICC Docket No. 21-0607 & ICC Docket No. 21-0739 (consolidated), February 2022. Provided testimony related to the review and evaluation of the rate effects of Commonwealth Edison's misconduct admitted in the Deferred Prosecution Agreement between the United States Attorney for the Northern District of Illinois and Commonwealth Edison. Provided testimony on behalf of the Office of the Illinois Attorney General, the City of Chicago, and the Citizens Utility Board.

Philadelphia Gas Works (Philadelphia Gas Commission, Fiscal Year 2022 - 2023 Capital Budget Proceeding), February 2022. Presented testimony proposing several adjustments to Philadelphia Gas Works' Fiscal Year 2023 Capital Budget on behalf of the Public Advocate.

Philadelphia Water Department (Philadelphia Water, Sewer and Storm Water Rate Board, 2022 Tiered Assistance Program Rate Rider Surcharge Rates Proceeding), March 2022. Presented testimony regarding the appropriate adjustments to the 2022 TAP-R determination. Presented testimony on behalf of the Public Advocate.

Philadelphia Water Department (Philadelphia Water, Sewer and Storm Water Rate Board, Fiscal Years 2023 Special Rate Proceeding), April 2022. Presented testimony that demonstrated Philadelphia Water Department's outperformance and proposed a sharing of the utility's outperformance earnings. Presented testimony on behalf of the Public Advocate.

Maine Water Company-Camden& Rockland Division (Maine Public Utilities Commission, Docket No. 2022-00056), June 2022. Assisted the Maine Office of Public Advocate (OPA) with Maine Water Company's application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OPA, on accounting issues including test year revenue requirements.

Maine Water Company-Freeport Division (Maine Public Utilities Commission, Docket No. 2022-00057), June 2022. Assisted the Maine Office of Public Advocate (OPA) with Maine Water Company's application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OPA, on accounting issues including test year revenue requirements.

Maine Water Company-Millinocket Division (Maine Public Utilities Commission, Docket No. 2022-00058), June 2022. Assisted the Maine Office of Public Advocate (OPA) with Maine Water Company's application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OPA, on accounting issues including test year revenue requirements.

Maine Water Company-Oakland Division (Maine Public Utilities Commission, Docket No. 2022-00059), June 2022. Assisted the Maine Office of Public Advocate (OPA) with Maine Water Company's application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OPA, on accounting issues including test year revenue requirements.

Columbia Gas of Pennsylvania (Pennsylvania Public Utility Commission, Docket No. R-2022-3031211), June 2022. Assisted the Pennsylvania Office of Consumer Advocate (OCA) with Columbia Gas of Pennsylvania's application for an increase in rates. Presented testimony, on behalf of the OCA, on accounting issues including test year revenue requirements.

Philadelphia Gas Works (Philadelphia Gas Commission, Fiscal Year 2022 - 2023 Operating Budget Proceeding), June 2022. Presented testimony on the reasonableness of the Fiscal Year 2023 Operating Budget on behalf of the Public Advocate.

Columbia Gas of Maryland (Public Service Commission of Maryland, Case No. 9680), July 2022. Presented joint testimony on rate base and cost of service issues on behalf of the Office of People's Counsel.

Oncor Electric Delivery Company (Public Utility Commission of Texas, PUC Docket No. 53601), August 2022. Presented joint testimony on rate base and cost of service issues on behalf of the Department of Defense and Federal Executive Agencies.

Cheyenne Light, Fuel and Power Company d/b/a Black Hills Energy (Wyoming Public Service Commission, Docket No. 20003-214-ER-22), November 2022. Presented testimony, on behalf of Microsoft Corporation, on rate base and cost of service issues.

Central Maine Power Company (Maine Public Utilities Commission, Docket No. 2022-00152), December 2022. Assisted the Maine Office of Public Advocate (OPA) with Central Maine Power's application for an increase in rates. Provided testimony, on behalf of the OPA, on accounting issues including test year revenue requirements and the company's request for a multi-year rate plan.

National Fuel Gas Distribution Corporation (Pennsylvania Public Utility Commission, Docket No. R-2022-3035730), January 2023. Assisted the Pennsylvania Office of Consumer Advocate (OCA) with National Fuel Gas Distribution Corporation's application for an increase in rates. Presented testimony, on behalf of the OCA, on accounting issues including test year revenue requirements.

Philadelphia Gas Works (Philadelphia Gas Commission, Fiscal Year 2022 - 2023 Capital Budget Proceeding), February 2023. Presented testimony proposing several adjustments to Philadelphia Gas Works' Fiscal Year 2024 Capital Budget on behalf of the Public Advocate.

Philadelphia Water Department (Philadelphia Water, Sewer and Storm Water Rate Board, 2023 Tiered Assistance Program Rate Rider Surcharge Rates Proceeding), March 2023. Presented testimony regarding the appropriate adjustments to the 2023 TAP-R determination. Presented testimony on behalf of the Public Advocate.

Philadelphia Water Department (Philadelphia Water, Sewer and Storm Water Rate Board, Fiscal Years 2024 - 2025 Rates Proceeding), April 2023. Presented testimony on behalf of the Public Advocate on revenue requirements and issues relating to the Department's proposed two-year rate plan.

Dayton Power and Light Company d/b/a AES Ohio (The Public Utilities Commission of Ohio, Case No. 22-900-EL-SSO), April 2023. Presented testimony addressing the recovery of deferred costs and regulatory assets as part of AES Ohio's Application for Approval of Its Electric Security Plan on behalf of the Office of the Ohio Consumers' Counsel.

Maine Water Company- Biddeford & Saco Division (Maine Public Utilities Commission, Docket No. 2023-00065), June 2023. Assisted the Maine Office of Public Advocate (OPA) with Maine Water Company's application for an increase in rates. Provided testimony, on behalf of the OPA, on accounting issues and test year revenue requirements.

Potomac Edison Company (Public Service Commission of Maryland, Case No. 9695), June 2023. Presented testimony on rate base, cost of service and accounting issues on behalf of the Office of People's Counsel.

Philadelphia Gas Works (Philadelphia Gas Commission, Fiscal Year 2023 - 2024 Operating Budget Proceeding), June 2023. Presented testimony identifying issues and recommendations to be considered in approving the Fiscal Year 2024 Operating Budget on behalf of the Public Advocate.

Northern Utilities, Inc. (Maine Public Utilities Commission, Docket No. 2023-00051), July 2023. Assisted the Maine Office of Public Advocate (OPA) with Northern Utilities application for an increase in rates. Provided testimony, on behalf of the OPA, on accounting issues and test year revenue requirements.

Philadelphia Gas Works (Philadelphia Gas Commission, Fiscal Year 2024 Capital Budget Amendment), August 2023. Presented testimony as to the appropriateness of Philadelphia Gas Works' amendments to the Fiscal Year 2024 Capital Budget on behalf of the Public Advocate.

Evergy Kansas Central, Inc. (Kansas State Corporation Commission, Docket No. 23-EKCE-775-RTS), August 2023. Assisted the U.S. Department of Defense and the Federal Executive Agencies with Evergy Kansas Central, Inc. application for an increase in rates. Provided testimony on accounting issues including test year revenue requirements.

American Transmission Systems, Inc., Mid-Atlantic Interstate Transmission, LLC and Trans-Allegheny Interstate Line Company (Pennsylvania Public Utility Commission, Docket Nos. A-2023-3040481, A-2023-3040482, A-2023-3040483, G-2023-3040484 and G-2023-3040485), August 2023. Assisted the Pennsylvania Office of Consumer Advocate (OCA) with investigation of Joint Applicants application to sell additional equity stake in FirstEnergy Transmission LLC to North American Transmission Company II, L.P. Provided testimony, on behalf of the OCA, identifying issues and recommendations to be considered by the Commission in approving the transaction.

Fitchburg Gas and Electric Light Company d/b/a Unitil (Electric and Gas Divisions) (Massachusetts Department of Public Utilities, Docket Nos. D.P.U. 23-80 & 23-81), December 2023. Assisted the Massachusetts Office of Attorney General (AGO) with Fitchburg Gas and Electric Light Company's application for an increase in rates. Provided testimony, on behalf of the OPA, on accounting issues and test year revenue requirements.

Philadelphia Gas Works (Philadelphia Gas Commission, Fiscal Year 2024 - 2025 Capital Budget Proceeding), February 2024. Presented testimony proposing several adjustments to Philadelphia Gas Works' Fiscal Year 2024 Capital Budget on behalf of the Public Advocate.

Pawtucket Water Supply Board (Rhode Island Public Utilities Commission, Docket No. 23-30-WW), March 2024. Presented testimony on revenue requirements issues on behalf of the Rhode Island Division of Public Utilities and Carriers.

Massachusetts Electric Company and Nantucket Electric Company, d/b/a National Grid (Massachusetts Department of Public Utilities, Docket Nos. D.P.U. 23-150), March 2024. Assisted the Massachusetts Office of Attorney General (AGO) with National Grid's application for an increase in rates. Provided testimony, on behalf of the OPA, on accounting issues and test year revenue requirements.

Philadelphia Water Department (Philadelphia Water, Sewer and Storm Water Rate Board, 2024-Tiered Assistance Program Rate Rider Surcharge Rates Proceeding), April 2024. Presented testimony regarding the appropriate adjustments to the 2024 TAP-R determination. Presented testimony on behalf of the Public Advocate.

Pennsylvania-American Water Company, Manwalamink Water Company and Manwalamink Sewer Company (Pennsylvania Public Utility Commission, Docket Nos. A-2023-3044418, A-2023-3044419, A-2023-3044421, A-2023-3044422), May 2024. Assisted the Pennsylvania Office of Consumer Advocate (OCA) with investigation of Pennsylvania-American application to acquire Manwalamink Water Company and Manwalamink Sewer Company. Provided testimony, on behalf of the OCA, identifying issues and recommendations to be considered by the Commission in approving the transaction.

Veolia Water Pennsylvania, Inc. (Pennsylvania Public Utility Commission, Docket Nos. R-2024-3045192 and R-2024-3045193, May 2024. Assisted the Pennsylvania Office of Consumer Advocate (OCA) with Veolia Water Pennsylvania's application for an increase in rates. Presented testimony, on behalf of the OCA, on accounting issues including test year revenue requirements.

Dominion Energy South Carolina, Inc. (South Carolina Public Service Commission, Docket No. 2024-34-E), June 2024. Assisted the U.S. Department of Defense and the Federal Executive Agencies with Dominion Energy South Carolina, Inc.'s application for an increase in rates. Provided testimony on accounting issues including test year revenue requirements.

Versant Maine (Maine Public Utilities Commission, Docket No. 2023-00336), June 2024. Assisted the Maine Office of Public Advocate (OPA) with Versant's application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OPA, on accounting issues including test year revenue requirements.

Maryland Water Service (Public Service Commission of Maryland, Case No. 9729), June 2024. Presented testimony on rate base and cost of service issues on behalf of the Office of People's Counsel.

Philadelphia Gas Works (Philadelphia Gas Commission, Fiscal Year 2024 - 2025 Operating Budget Proceeding), June 2024. Presented testimony identifying issues and recommendations to be considered in approving the Fiscal Year 2025 Operating Budget on behalf of the Public Advocate.

Elizabethtown Gas Company (New Jersey Board of Public Utilities, BPU Docket No. GR24020158), June-August 2024. Assisted the Division of Rate Counsel with the investigation and litigation of Elizabethtown Gas Company's application for an increase in rates. Mr. Morgan investigated the Company's claimed revenue requirement and assisted the Division of Rate Counsel on accounting issues and participated in the settlement negotiations leading to the case resolution.

New Jersey Natural Gas Company (New Jersey Board of Public Utilities, BPU Docket No. GR19020278), July-September 2024. Assisted the Division of Rate Counsel with the investigation and litigation of New Jersey Natural Gas Company's Request for Approval to Implement an Infrastructure Investment Program and Associated Cost Recovery Mechanism.

City of Newport Utilities Department Water Division (Rhode Island Public Utilities Commission, Docket No. 24-30-WW), October 2024. Presented testimony on revenue requirements issues on behalf of the Rhode Island Division of Public Utilities and Carriers.

Staff-Assisted Rate Case for Nine Water Utilities Located in Southern Maryland (Maryland Public Service Commission, Case No. 9750), November 2024. Engaged by the Maryland Office of People's Counsel to review, evaluate and determine the reasonableness of the revenue requirement of the Commission Staff-assisted Rate Case for nine small water utilities.

Maine Water Company-Camden & Rockland Division (Maine Public Utilities Commission, Docket No. 2024-00291), January 2025. Assisted the Maine Office of Public Advocate (OPA) with Maine Water Company's application for an increase in rates. Mr. Morgan provided testimony, on behalf of the OPA, on accounting issues including test year revenue requirements.

Philadelphia Gas Works (Philadelphia Gas Commission, Fiscal Year 2025 - 2026 Capital Budget Proceeding), February 2025. Presented testimony proposing several adjustments to Philadelphia Gas Works' Fiscal Year 2026 Capital Budget on behalf of the Public Advocate.

City of Woonsocket Water Division (Rhode Island Public Utilities Commission, Docket No. 25-01-WW), April 2025. Presented testimony on revenue requirements issues on behalf of the Rhode Island Division of Public Utilities and Carriers.

Golden Heart Utilities, Inc. and College Utilities Corporation (The Regulatory Commission of Alaska, Docket No. U-24-030 & U-24-031), April 2025. Presented testimony on water and sewer revenue requirements/cost of service issues on behalf of the United States Department of Defense and All Other Federal Executive Agencies.

Philadelphia Water Department (Philadelphia Water, Sewer and Storm Water Rate Board, 2025 Tiered Assistance Program Rate Rider Surcharge Rates Proceeding), April 2025. Presented testimony regarding the appropriate adjustments to the 2025 TAP-R determination. Presented testimony on behalf of the Public Advocate.

Philadelphia Water Department (Philadelphia Water, Sewer and Storm Water Rate Board, Fiscal Years 2026 - 2027 Rates Proceeding), May 2025. Presented testimony on behalf of the Public Advocate on revenue requirements and issues relating to the Department's proposed two-year rate plan.

Philadelphia Gas Works (Philadelphia Gas Commission, Fiscal Year 2025 - 2026 Operating Budget Proceeding), June 2025. Presented testimony identifying issues and recommendations to be considered in approving the Fiscal Year 2026 Operating Budget on behalf of the Public Advocate.

Loring Development Authority (Maine Public Utilities Commission, Docket No. 2024-00300), June 2025. Assisted the Maine Office of Public Advocate (OPA) with the determination Loring Development Authority's initial rates as a regulated utility. Mr. Morgan provided testimony, on behalf of the OPA, on accounting issues including the test year cost of service and revenue requirements.

Pike County Light and Power Company, Leatherstocking Gas Company, LLC, Corning Energy Corporation, ACP Series 3 Partnership L.P., Argo Capital Platform (P) 2017, L.P. Argo Capital Platform (K) Series 3, L.P., ACP Crotona Holdings L.P., ACP Crotona Corp., Argo Infrastructure Partners LLC and Apollo Global Management, Inc. (Pennsylvania Public Utility Commission, A-2025-3055264, A-2025-3055265, A-2025-3055335), September 2025. Assisted the Pennsylvania Office of Consumer Advocate (OCA) with investigation of Apollo Global Management, Inc. application to acquire Pike County Light and Power Company and Leatherstocking Gas Company, LLC,. Provided testimony, on behalf of the OCA, identifying issues and recommendations to be considered by the Commission in approving the transaction.

American Water Works Company, Inc. ("American Water"), Pennsylvania-American Water Company ("PAWC"), Nexus Regulated Utilities, LLC ("Nexus") and Community Utilities of Pennsylvania Inc. ("CUPA") for all the necessary authority, approvals, and certificates of public convenience under Sections 1102 and 1103 of the Pennsylvania Public Utility Code to approve the transfer of control of CUPA from Nexus to American Water. (Pennsylvania Public Utility Commission, A-2025-3055551, A-2025-3055552, A-2025-3055553, A-2025-3055554), October 2025. Assisted the Pennsylvania Office of Consumer Advocate (OCA)

with investigation of Pennsylvania-American Water application to acquire Community Utilities of Pennsylvania Inc. Provided testimony, on behalf of the OCA, identifying issues and recommendations to be considered by the Commission in approving the transaction.

Energy Center Harrisburg LLC. (Pennsylvania Public Utility Commission, Docket No. R-2025-3055959, October 2025. Assisted the Pennsylvania Office of Consumer Advocate (OCA) with the evaluation of Energy Center Harrisburg LLC's request for a base rate increase. Presented testimony, on behalf of the OCA, on accounting issues including test year revenue requirements.

City of Lancaster – Water Department (Pennsylvania Public Utility Commission, Docket No. R-2025-3057237), December 2025. Assisted the Pennsylvania Office of Consumer Advocate (OCA) with the City of Lancaster – Water Department's application for an increase in rates. Presented testimony, on behalf of the OCA, on accounting issues including test year revenue requirements.

PPL Electric Utilities (Pennsylvania Public Utility Commission, Docket No. R-2025-3057164), December 2025. Presented testimony on rate base and cost of service issues on behalf of the Pennsylvania Office of Consumer Advocate.

Special Projects

Developed a Uniform System of Accounts and Financial Data Collection Template for five countries participating in the National Association of Regulatory Utility Commissioners (NARUC)/East Africa Regional Energy Regulatory Partnership. Also conducted training seminars and participated as a panel member addressing issues in the utility industry from the perspective of the regulator. This work was conducted by NARUC) and the United States Agency for International Development (USAID).

Other Projects

Texas Gas Transmission Corporation (Federal Energy Regulatory Commission, Docket No. RP93-106). Technical analysis and participation in settlement negotiations on cost of service, invested capital, and revenue deficiency on behalf of the Indiana Office of Utility Consumer Counselor.

Natural Gas Pipeline Company of America (Federal Energy Regulatory Commission, Docket No. RP93-36). Technical analysis and participation in settlement negotiations on cost of service, invested capital, and revenue deficiency on behalf of the Indiana Office of Utility Consumer Counselor.

Texas Gas Transmission Company (Federal Energy Regulatory Commission, Docket No. RP94-423). Technical analysis and participation in settlement negotiations on cost of service, invested capital, and revenue deficiency on behalf of the Indiana Office of Utility Consumer Counselor.

Lafourche Telephone Company (Louisiana Public Service Commission, Docket No. U-21181). Analysis and investigation of earnings and appropriate rate of return on behalf of the Louisiana Public Service Commission Staff.

Natural Gas Pipeline Company of America (Federal Energy Regulatory Commission, Docket No. RP95-326). Technical analysis and participation in settlement negotiations on cost of service, invested capital, and revenue deficiency on behalf of the Indiana Office of Utility Consumer Counselor.

Pymatuning Independent Telephone Company (Pennsylvania Public Utility Commission, Docket No. R-00953502). Technical analysis and development of settlement position in the Company's rate case on behalf of the Pennsylvania Office of Consumer Advocate.

Illinois Bell Telephone Company (Illinois Commerce Commission, Docket No. 96-0172). Technical analysis of the Company's annual rate filing pursuant to its Price Cap Plan on behalf of Citizens Utility Board.

Illinois Bell Telephone Company (Illinois Commerce Commission, Docket No. 97-0157). Technical analysis of the Company's annual rate filing pursuant to its Price Cap Plan on behalf of Citizens Utility Board.

TDS Telecom (Pennsylvania Public Utility Commission, Docket Nos. R-00973892 and R-00973893). Technical analysis regarding rate base, cost of service, rate design, and rate of return, and assistance in settlement negotiations in the Company's rate case and alternative regulatory filing on behalf of the Pennsylvania Office of Consumer Advocate.

Appalachian Power Company (Virginia State Corporation Commission, Case No. PUE 960301). Technical analysis regarding rate base and cost of service and assistance in settlement negotiations in the Company's rate case and alternative regulatory filing on behalf of the Virginia Office of the Attorney General.

Central Maine Power Company (Maine Public Utilities Commission, Docket No. 97-580). Technical analysis regarding attrition and accounting issues in the Company's Transmission and Distribution unbundling proceeding on behalf of the Maine Public Utilities Commission Staff.

Illinois Bell Telephone Company (Illinois Commerce Commission, Docket No. 98-0259). Technical Analysis of the Company's annual rate filing pursuant to its Price Cap Plan on behalf of Citizens Utility Board.

Maine Public Service Company (Maine Public Utilities Commission, Docket No. 98-577). Technical analysis regarding attrition and accounting issues in the Company's Transmission and Distribution unbundling proceeding on behalf of the Maine Public Utilities Commission Staff.

Bangor Hydro-Electric Company (Maine Public Utilities Commission, Docket No. 97-596). Technical analysis regarding attrition and accounting issues in the Company's Transmission and Distribution unbundling proceeding on behalf of the Maine Public Utilities Commission Staff.

TDS Telecom (Maine Public Utilities Commission, Docket Nos. 98-894, 98-895, 98-904, 98-906, 98-911, and 98-912). Technical analysis regarding accounting issues and access rate changes on behalf of the Maine Office of the Public Advocate.

Mid-Maine Telecom (Maine Public Utilities Commission, Docket No. 2000-810). Technical analysis regarding accounting issues and access rate changes on behalf of the Maine Office of the Public Advocate.

Unitel, Inc. (Maine Public Utilities Commission, Docket No. 2000-813). Technical analysis regarding accounting issues and access rate changes on behalf of the Maine Office of the Public Advocate.

Hydraulics International, Inc. (Armed Services Board of Contract Appeals, ASBCA No. 51285). Technical analysis and support relating to the Economic Adjustment Clause claim on behalf of the Air Force Materiel Command.

Tidewater Telecom and Lincolnville Telephone Company (Maine Public Utilities Commission, Docket Nos. 2002-100 and 2002-99). Technical analysis regarding accounting issues and access rate changes on behalf of the Maine Office of the Public Advocate.

TDS Telecom (Vermont Public Service Board, Docket No. 6576). Technical analysis regarding rate base, cost of service, and depreciation expense on behalf of the Vermont Department of Public Service.

CenterPoint Energy-Entex (Louisiana Public Service Commission, Docket No. U-26720, Subdocket A). Technical analysis regarding rate base and cost of service on behalf of the Louisiana Public Service Commission Staff.

CenterPoint Energy-Arkla (Louisiana Public Service Commission, Docket No. U-27676). Technical analysis regarding rate base and cost of service on behalf of the Louisiana Public Service Commission Staff.

Provided technical analysis and support on behalf of the Louisiana Public Service Commission Staff relating to CLECO Power LLC Rate Stabilization Plan.

Provided technical analysis and support on behalf of the Louisiana Public Service Commission Staff relating to CLECO Power LLC post-Katrina power purchases.

Provided technical analysis and support on behalf of the Louisiana Public Service Commission Staff relating to Entergy Louisiana LLC recovery of storm damage costs.

Westar Energy, Inc. (Westar Energy) and Kansas Gas and Electric Company (KGE), (Kansas State Corporation Commission, Docket No. 17-WSEE-147-RTS). Technical analysis regarding rate base and cost of service on behalf of the Federal Executive Agencies.

Westar Energy, Inc. (Westar Energy) and Kansas Gas and Electric Company (KGE), (Kansas State Corporation Commission, Docket No. 17-WSEE-147-RTS). Technical analysis regarding rate base and cost of service on behalf of the Federal Executive Agencies.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission

v. Docket No. R-2025-3059428

National Fuel Gas Distribution Corp.
:

VERIFICATION

I, Lafayette K. Morgan, Jr., hereby state that the facts above set forth in my Direct Testimony, OCA Statement 2, are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

DATED: April 16, 2026

Signature: Lafayette Morgan Jr.
Lafayette K. Morgan, Jr

Address: Exeter Associates, Inc.
10480 Little Patuxent Parkway
Suite 300
Columbia, MD 21044-3575

OCA Statement 2SR

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION V. NATIONAL FUEL GAS DISTRIBUTION CORPORATION PENNSYLVANIA DIVISION	: : : : : : : :	DOCKET NO. R-2025-3059428

SURREBUTTAL TESTIMONY
OF
LAFAYETTE K. MORGAN, JR.

ON BEHALF OF THE PENNSYLVANIA
OFFICE OF CONSUMER ADVOCATE

MAY 27, 2026

EXETER
ASSOCIATES, INC.
10480 Little Patuxent Parkway, Suite 300
Columbia, Maryland 21044

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I. Introduction

Q. **PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is Lafayette K. Morgan, Jr. My business address is 10480 Little Patuxent Parkway, Suite 300, Columbia, Maryland, 21044. I am a Public Utilities Consultant working with Exeter Associates, Inc. ("Exeter"). Exeter is a consulting firm specializing in issues pertaining to public utilities.

Q. **ARE YOU THE SAME LAFAYETTE K. MORGAN JR. WHO SUBMITTED PRE-FILED DIRECT TESTIMONY IN THIS PROCEEDING?**

A. Yes, I am.

Q. **WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?**

A. The purpose of my surrebuttal testimony is to respond to the rebuttal testimonies of National Fuel Gas Distribution Corporation ("NFG" or the "Company") witnesses Courtney T. Mann, Donald N. Koch, Anthony T. Formato, Michael P. Weidner, Monika M. Duszenko and Erica L. Forcucci which were filed on May 12, 2026. In this surrebuttal testimony, I will respond to these witnesses' disagreements with the adjustments I recommended in my direct testimony and further explain why I continue to recommend the adjustments I made. In certain instances, NFG has accepted my adjustments. Similarly, in certain instances, I have also either withdrawn or revised certain adjustments that I initially recommended in direct testimony. I will provide an explanation of those changes later in this testimony.

Q. **DID NFG REVISE ITS REQUESTED REVENUE INCREASE?**

A. Yes. Company witness Koch stated in his rebuttal testimony that the Company revised its revenue increase from $19,680,000 to $18,475,000 which resulted in a reduction of $1,205,000.

Q. **HAVE YOU PREPARED EXHIBITS TO ACCOMPANY YOUR SURREBUTTAL TESTIMONY?**

A. Yes. As presented in my direct testimony, I have prepared two sets of exhibits that presents the OCA position based upon the recommended rate of return ("ROR") and the alternative ROR. As the starting point for my surrebuttal revenue requirement, I have used the cost of service presented in NFG's rebuttal filing, and I made adjustments consistent with the positions taken in my direct testimony, except where I have revised the adjustments. Consistent with my direct testimony, the exhibits with the suffix "A" present the OCA's recommended position and the suffix "B" denotes the OCA alternate position. The difference in the two sets of exhibits is caused by the difference in the ROR.

To the extent I have made any changes from my direct testimony, I will explain why the change was necessary. After incorporating NFG's and the OCA's changes to the cost of service, I have determined that the Company's annual revenues, using the OCA's recommended ROR, should be increased by $ 4.305 million annually as shown on Exhibit LKM-1A-SR. This represents a decrease of $14.170 million from the Company's revised increase of $18.475 million. Using the OCA's alternative ROR, the Company's annual revenues should be increased by $4.205 million annually. This represents a decrease of $14.270 million from the Company's revised increase of $18.475 million. This is the amount by which revenues exceed those required to generate an overall rate of return on rate base of 7.54% percent after accounting for the OCA's adjustments to the Company's claimed rate base and operating income. It should be noted that Ms. Reno has revised her alternative ROR recommendation from 7.62% to 7.54%. The table below summarizes my adjustment to the cost of service.

National Fuel Gas Distribution Corporation
Summary of Cost of Service Adjustments
($ in Thousands)

Line No.	Description	Rate Base	Revenue	Operating Expenses	Income Taxes Effect
1	Adjustment to Cash Working Capital	$ (1,195)	$ -	$ -	$ -
2	Include CIAC in Rate Base	(20)	-	-	-
3	Include Customer Advances in Rate Base	7	-	-	-
4	Effect of Depreciation Rates on Accum. Depreciation	4,670	-	-	-
5	Reflect Growth in Rent From Gas Property	-	12	-	3
6	Remove Stock-Based Compensation	-	-	(1,430)	385
7	Amortize Insurance Settlement Proceeds	-	-	(266)	72
8	Remove Office Employee Inflation Adjustment	-	-	(64)	17
9	Remove Other Expense -Line Hit Collections	-	-	(156)	42
10	Remove Charge Off Of Customer A/R	-	-	-	-
11	Normalize Uncollectible Expense	-	-	(73)	19
12	Reflect Postage Rate Increase	-	-	(175)	47
13	Remove Economic Development	-	-	(17)	4
14	Include Customer Payment Transaction Costs	-	-	930	(251)
15	Reflect OCA Recommended Depreciation Rates	-	-	(4,670)	1,257
16	Interest Synchronization Adjustment	-	-	-	(579)
17	Total OCA Adjustments	$ 3,462	$ 12	$ (5,920)	$ 1,016

II. Revenue Requirement Issues

Q. **PLEASE RESPOND TO MR. KOCH'S REBUTTAL TESTIMONY.**

A. In Mr. Koch's rebuttal testimony, he presents the Company's revised revenue requirement. He explains that the $1,205,000 reduction in NFG's revenue requirement is the result of NFG's adjustments to include Customer Advances and Contribution in Aid of Construction ("CIAC") in rate base, and to reduce the requested ROE from 11.25% to 11.0%. Mr. Koch concludes his testimony by stating that the Company has reviewed I&E, OCA, and OSBA's (the statutory parties) proposed revenue requirement adjustments, but that the Company maintains its position that the original revenue

requirement filing accurately reflects its needs and obligations, except where noted.[1] He urges the Commission to deny any adjustments proposed by the statutory parties.[2]

As I will explain in the following sections of this testimony, I do not agree with Mr. Koch's overall conclusion. In response to NFG witnesses' rebuttal testimony relating to revenue requirement, I will further explain why the Commission should not accept the costs of service as proposed by NFG.

1. Forfeited Discounts

Q. **PLEASE RESPOND TO NFG WITNESS MANN'S REBUTTAL TESTIMONY WITH RESPECT TO YOUR ADJUSTMENT TO FORFEITED DISCOUNTS.**

A. In my direct testimony, I adjusted forfeited discounts to reflect the effect of the OCA's recommended increase in revenue requirement as a result of this proceeding. Mr. Mann disagrees with my adjustment. First, he states that the magnitude of my adjustment is tied to the OCA's recommended revenue increase. Second, he disagrees with my use of a three-year average to determine the forfeited discounts factor. Third, he states that I improperly excluded transportation revenues from the derivation of the adjustment to forfeited discounts.

Mr. Mann's disagreement with the magnitude of my adjustment is misplaced because he misunderstands the reason for my adjustment. The reason for my adjustment is to recognize that as service revenues increase, there will be a corresponding increase in forfeited discounts because the forfeited discounts are assessed based upon the outstanding customer bill. NFG did not propose an adjustment to recognize the inter-related relationship between service revenues and forfeited discounts. Ultimately, the value of the adjustment is not likely to be the amount I recommended because it would

[1] Rebuttal Testimony of Donald N. Koch at 4:6-12.
[2] *Id.*

be based on the increase in revenue granted by the Commission. This adjustment is a typical adjustment made in rate cases before this Commission. Hence, I believe this adjustment is valid.

The second reason Mr. Mann disagrees with my adjustment, the use of a three-year average for the forfeited discounts factor, is because he claims that Fiscal Year 2024 late payment charges (forfeited discounts) were unusually high and are not representative of the FPFTY. However, this is the reason for using a three-year average, because the intent is to normalize the forfeited discounts factor to recognize the year-to-year fluctuations. The three-year average is a standard methodology used by the Commission because it is recognized that no single year is representative to use for deriving the forfeited discounts factor. As an example, NFG uses a three-year average to determine uncollectible expense. Thus, Mr. Mann's criticism of the three-year average is not valid.

The third reason for disagreement with my adjustment is that I excluded transportation revenue when calculating the forfeited discounts factor. This exclusion was inadvertent. Therefore, I have revised the calculation of the forfeited discounts factor on Exhibit LKM-6A-SR. This revision results in a change in the adjustment to forfeited discounts from $26,000 to $21,000, a $5,000 decrease.

2. <u>Rent From Gas Property</u>

Q. **PLEASE RESPOND TO NFG WITNESS MANN'S DISAGREEMENT WITH YOUR ADJUSTMENT TO RENT FROM GAS PROPERTY IN HIS REBUTTAL TESTIMONY.**

A. In Mr. Mann's rebuttal testimony, he disagrees with my adjustment of $12,000 to Rent From Gas Property. According to him there are no known or measurable changes to

support an additional increase in Rent From Gas Property. However, the Company's own data shows a clear pattern and trend of annual increases in Rent From Gas Property. Below I present a reproduction of the attachment OCA 10-21 which was provided by the Company. The annual growth pattern and be seen on the highlighted lines. Based on this data I believe my adjustment for $12,000 to Rent From Gas Property, presented on Exhibit LKM -7A, is appropriate and reasonable.

National Fuel Gas Distribution Corporation
Pennsylvania Division
III-H.5

TME 9/30/2023

Account	Description	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Total
487	**Forfeited Discounts**	$ 84,241	$ 104,375	$ 140,536	$ 178,823	$ 187,182	$ 155,931	$ 138,345	$ 108,110	$ 71,429	$ 57,855	$ 71,146	$ 75,052	$ 1,373,026
493	**Rent From Gas Property**	$ 7,551	$ 10,191	$ 7,086	$ 7,086	$ 7,086	$ 7,086	$ 7,086	$ 7,086	$ 7,086	$ 7,086	$ 7,086	$ 7,086	$ 88,602
495	**Capacity Release**	$ 30,843	$ 43,036.6	$ 49,206	$ 54,771	$ 45,934	$ 44,466	$ 37,571	$ 35,023	$ 37,351	$ 34,975	$ 33,620	$ 33,477	$ 480,275
495	**TCJA**	$ 316,956	$ (277,420)	$ (908,367)	$ (963,430)	$ (934,020)	$ (504,719)	$ (319,534)	$ -	$ 714,876	$ 410,241	$ (112,510)	$ 1,419,454	$ (1,158,473)
495	**Marketer Billing Charges**	$ 3,747	$ 3,736	$ 3,712	$ 3,701	$ 3,693	$ 3,672	$ 3,646	$ 3,603	$ 3,573	$ 3,570	$ 3,570	$ 3,556	$ 43,779
495	**Other Gas Revenues**	$ (394)	$ 354	$ (1,854)	$ 2,346	$ 127	$ 293	$ 248	$ (523)	$ (1,301)	$ 196	$ 2,419	$ 207	$ 2,118

Account	Description	% Change											
487	**Forfeited Discounts**		24%	35%	27%	5%	-17%	-11%	-22%	-34%	-19%	23%	5%
493	**Rent From Gas Property**		35%	-30%	0%	0%	0%	0%	0%	0%	0%	0%	0%
495	**Capacity Release**		40%	14%	11%	-16%	-3%	-16%	-7%	7%	-6%	-4%	0%
495	**TCJA**		-188%	227%	6%	-3%	-46%	-37%	-100%	0%	-43%	-127%	-1362%
495	**Marketer Billing Charges**		0%	-1%	0%	0%	-1%	-1%	-1%	-1%	0%	0%	0%
495	**Other Gas Revenues**		-190%	-624%	-227%	-95%	131%	-15%	-310%	149%	-115%	1136%	-91%

TME 9/30/2024

Account	Description	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Total
487	**Forfeited Discounts**	$ 69,198	$ 82,165	$ 93,435	$ 133,262	$ 137,804	$ 115,382	$ 98,272	$ 86,857	$ 75,354	$ 57,724	$ 63,738	$ 64,099	$ 1,077,292
493	**Rent From Gas Property**	$ 7,086	$ 7,086	$ 12,233	$ 7,290	$ 7,290	$ 7,290	$ 7,290	$ 7,290	$ 7,290	$ 7,290	$ 7,290	$ 7,290	$ 92,015
495	**Capacity Release**	35,574	41,582	38,507	37,423	35,634	35,163	16,395	18,223	18,157	15,969	14,568	14,471	$ 321,666
495	**TCJA**	$ -	$ -	$ -	$ (90,289)	$ -	$ -	$ -	$ -	$ -	$ -	$ 110,682	$ -	$ 20,393
495	**Marketer Billing Charges**	$ 3,536	$ 3,517	$ 3,500	$ 3,490	$ 3,499	$ 3,494	$ 3,504	$ 3,517	$ 3,543	$ 3,572	$ 3,594	$ 3,629	$ 42,396
495	**Other Gas Revenues**	$ (2,096)	$ 1,054	$ 1,445	$ 595	$ (301)	$ 192	$ 58	$ 175	$ 302	$ (1,337)	$ 2,075	$ 2,891	$ 5,053

Account	Description	% Change											
487	**Forfeited Discounts**		19%	14%	43%	3%	-16%	-15%	-12%	-13%	-23%	10%	1%
493	**Rent From Gas Property**		0%	73%	-40%	0%	0%	0%	0%	0%	0%	0%	0%
495	**Capacity Release**		17%	-7%	-3%	-5%	-1%	-53%	11%	0%	-12%	-9%	-1%
495	**TCJA**		0%	0%	0%	-100%	0%	0%	0%	0%	0%	0%	-100%
495	**Marketer Billing Charges**		-1%	0%	0%	0%	0%	0%	0%	1%	1%	1%	1%
495	**Other Gas Revenues**		-150%	37%	-59%	-151%	-164%	-70%	203%	72%	-542%	-255%	39%

HTY - TME 9/30/2025

Account	Description	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Total
487	**Forfeited Discounts**	$ 59,907	$ 73,606	$ 106,985	$ 131,980	$ 145,981	$ 144,793	$ 110,116	$ 97,795	$ 75,765	$ 60,322	$ 68,299	$ 70,261	$ 1,145,810
493	**Rent From Gas Property**	$ 7,290	$ 16,397	$ 7,658	$ 7,658	$ 7,658	$ 7,658	$ 7,658	$ 7,658	$ 7,658	$ 7,658	$ 7,658	$ 7,658	$ 100,267
495	**Capacity Release**	17,339	17,179	16,562	14,191	13,160	13,621	12,420	12,276	11,851	15,571	12,389	12,642	$ 169,201
495	**TCJA**	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
495	**Marketer Billing Charges**	$ 3,647	$ 3,677	$ 3,722	$ 3,781	$ 3,825	$ 3,872	$ 3,902	$ 3,901	$ 3,896	$ 3,902	$ 3,899	$ 3,879	$ 45,902
495	**Other Gas Revenues**	$ (1,380)	$ 2,802	$ (434)	$ 380	$ 26	$ (1,339)	$ 1,760	$ 325	$ 589	$ (750)	$ 1,341	$ (1,568)	$ 1,751
														$ 1,462,930

Account	Description	% Change											
487	**Forfeited Discounts**		23%	45%	23%	11%	-1%	-24%	-11%	-23%	-20%	13%	3%
493	**Rent From Gas Property**		125%	-53%	0%	0%	0%	0%	0%	0%	0%	0%	0%
495	**Capacity Release**		-1%	-4%	-14%	-7%	4%	-9%	-1%	-3%	31%	-20%	2%
495	**TCJA**		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
495	**Marketer Billing Charges**		1%	1%	2%	1%	1%	1%	0%	0%	0%	0%	-1%
495	**Other Gas Revenues**		-303%	-115%	-188%	-93%	-5351%	-231%	-82%	81%	-227%	-279%	-217%

3. Working Capital Allowance

Q. **PLEASE RESPOND TO NFG WITNESS MONIKA M. DUSZENKO'S REBUTTAL TESTIMONY WITH RESPECT TO YOUR WORKING CAPITAL ADJUSTMENTS.**

A. In my direct testimony, I explained my adjustments to the cash working capital allowance. First, I adjusted the lead/lag study to reflect the adjustments to the operating expenses that I have recommended. Second, I removed amortization expenses and accrued expenses from the lead/lag study because those expenses do not require the use of cash, so it is inappropriate to include a cash working capital allowance for these expenses. Third, I recommended an adjustment to remove prepaid expenses (Prepayments) from rate base. I explained that because the Company included Prepayments as a component of the cash working capital allowance but did not remove prepaid expenses from the expenses in the lead lag expense, there was a double count of the working capital related to prepaid expenses.[3]

In her rebuttal testimony, Ms. Duszenko disagrees with my adjustment to remove prepayments from rate base.[4] According to Ms. Duszenko, the inclusion of prepayments in rate base is consistent with the methodology used in NFG's prior rate case.[5] However, she indicates that the Company made an adjustment to remove prepaid

[3] Reference to "Prepaid Expenses" and "Prepayments" may sometimes be used interchangeably. For the purpose of clarity in the discussion of the Cash Working Capital Allowance, there is a distinction that I want to recognize to avoid confusion. In my discussion, the word "Prepayments" is used to refer to unused expenses that were prepaid. These prepayments are held in Balance Sheet accounts and are included as a separate line item called "Prepayments" in the presentation of Cash Working Capital Allowance. When I refer to "prepaid expenses," I am referring to the portion of prepayments that are recognized as expenses in the annual account period. NFG has included prepaid expenses have been included in the operating expenses used in the lead/lag to calculate the Cash Working Capital Allowance.

[4] Rebuttal Testimony of Monika M. Duszenko at 3:17-22.

[5] *Id.*

expenses from the O&M expenses total which calculates the expense lag days, which was reflected in the lead lag study on the Company's Exhibit A, Schedule C-4.[6]

I will accept the approach used by NFG, in its rebuttal filing, which includes prepayments in rate base, but removes prepaid expenses from the lead/lag study.

However, I disagree with the quantification of the prepaid expenses removed from the lead/lag study because the Company removed as prepaid expenses from "Other Expenses" by the Company totals only $2,732,664. However, when my summation of the annual expenses for the following components of prepayments: insurance, PUC Assessments, AGA Dues and IT Services, it amounts to $9.455 million.[7] Hence, it appears to me that the Company did not capture all the expenses.

In addition to the removal of the prepaid expenses, I also recommended adjustments to remove non-cash expenses from the lead/lag study in my direct testimony. The Company did not address this adjustment in its rebuttal testimony. Nevertheless, as I explained in my direct testimony, non-cash expenses should not be included in the lead/lag study because the inclusion would result in providing a cash working capital allowance for a non-cash expense. Therefore, I recommend that the Commission reject NFG's inclusion of the non-cash expenses in the lead/lag study.

Although the Company opposes the adjustments I recommend to O&M expenses, it is appropriate for the Commission to reflect any of my O&M adjustments it accepts in the lead/lag study. Therefore, I continue to reflect those adjustments in the cost of service because they are appropriate. On Exhibit LKM-4A, I present my adjustment to cash working capital which reduces rate base by $1,195,000.

[6] *Id.* at 4:2-5.
[7] See Exhibit LKM – 4.

4. Contributions in Aid of Construction and Customer Advances

Q. **NFG APPEARS TO HAVE ACCEPTED YOUR ADJUSTMENT TO INCLUDE CONTRIBUTIONS IN AID OF CONSTRUCTION ("CIAC") AND CUSTOMER ADVANCES IN RATE BASE. IS THE OCA AND NFG NOW IN AGREEMENT ON THIS ISSUE?**

A. No. Conceptually, NFG agrees with the OCA that it is appropriate to include CIAC and Customer Advances in rate base. However, the Company proposes to include the HTY balances for CIAC and Customer Advances in the FPFTY rate base. I disagree with using the HTY values.

Q. **WHY DO YOU DISAGREE WITH USING THE HTY BALANCES?**

A. I disagree with using the HTY balances because the data is stale in comparison with the FPFTY (on which rates are being established). The FPFTY uses the values of plant that are projected two years into the future. Therefore, I recommend using the most recent 13-month average because of the difficulty in forecasting these two accounts. The most recent 13-month average is also more appropriate than the HTY values, because it captures the CIAC and Customer Advances for plant currently in service and included in the FPFTY cost of service. It is important to keep in mind that CIAC and Customer Advances are only collected when plant is placed in service to serve customers. Therefore, including the most recent 13-month balance CIAC and Customer Advances is appropriate because it matches plant that are already included in Plant in Service. Therefore, the Commission should reject the Company's proposed inclusion of the HTY average in rate base for CIAC and Customer Advances. On Exhibit LKM-5A, I present this adjustment which decreases rate base by a net amount of $13,000 to reflect the 13-month average CIAC and Customer Advances balances.

5. Incentive Compensation Expense

Q. **PLEASE RESPOND TO MR. WEIDNER'S DISAGREEMENT WITH YOUR ADJUSTMENT TO INCENTIVE COMPENSATION EXPENSES.**

A. In my direct testimony, I recommended an adjustment to remove the 2010 Equity Compensation Plan expense from the cost of service. The rationale for my adjustment was taken from a direct quote of the Company's plan.[8] Mr. Weidner disagrees with my adjustment and raises several issues that I will address separately below.

Q. **IS IT YOUR TESTIMONY THAT STOCK-BASED COMPENSATION IS SOLELY FOR THE BENEFIT OF SHAREHOLDERS, AND THEREFORE THE ENTIRE RATE RECOVERY REQUEST SHOULD BE DISALLOWED?**

A. No. Mr. Weidner states that I claimed that stock-based compensation is "solely for the benefit of shareholders".[9] I do not make such a claim in my testimony. However, I did state that, based on the purpose of the plan, shareholders are the primary beneficiaries of the plan. To claim that I stated that shareholders are the sole beneficiaries of the plan is a misrepresentation of my testimony. The purpose of the plan is quoted in my direct testimony,[10] and as can be seen in the quote, there is no mention of any measure other than the Company and shareholder success.

Q. **MR. WEIDNER STATES THAT A PORTION OF THE RESTRICTED STOCK AWARDS FOR EXECUTIVES AND NON-EXECUTIVE SUPERVISORS, ARE BASED ON THE RECIPIENTS CONTINUED SERVICE TO THE COMPANY OVER THE REQUISITE TIME. WITH RESPECT TO RATEPAYERS AND SHAREHOLDERS, DOES EMPLOYEE RETENTION HAVE A GREATER IMPACT ON EITHER RATEPAYERS OR SHAREHOLDERS?**

[8] Direct Testimony of Lafayette Morgan Jr. at 13:1-24.
[9] Rebuttal Testimony Michael P. Weidner at 9:10-12.
[10] Direct Testimony of Lafayette Morgan Jr. at 13:1-24.

A. In my opinion, an empirical study or analysis would be needed to reach a conclusion. However, the Company has indicated that a competitive total rewards package is needed to retain its current workforce.[11] The adjustment I am recommending does not challenge the total employee rewards package. Instead, the concern is who should bear the cost of the compensation that is aligned primarily with shareholders' interest.

Q. **MR. WEIDNER STATES THAT RESTRICTED STOCKS ARE USED TO ENCOURAGE RETENTION OF TOP PERFORMERS AND CONTROL COSTS ASSOCIATED WITH TURNOVER.[12] DOES THAT MEAN THAT THE COST OF THE PLAN SHOULD BE RECOVERED FROM RATEPAYERS?**

A. No. In my opinion, the purpose of the plan and the metrics used to determine the plan's payout are key to determine whether the plan is primarily established in the interest of shareholders or ratepayers. Hence, the basis of my adjustment has very little to do with the payoff being based on stock or cash. However, the payout in restricted stock more closely aligns the employee's interest to the shareholders' interest. An employee who gets rewarded with stock has an incentive to act or make decisions that would increase share values. Shareholders' interests are not necessarily compatible with ratepayers' interests. For example, delaying certain expenditures may improve earnings and share value while degrading customer service. This is why those plans with customer service metrics tend to be in the interest of ratepayers. Based on the foregoing discussion, I recommend that the Equity Compensation Plan expenses be removed from the cost of service. On Exhibit LKM-8A, I present this adjustment which reduces operating expenses by $1,430,000.

[11] Direct Testimony of Valerie L. Hawthorn Wagner at 9:11-14.
[12] Rebuttal Testimony Michael P. Weidner at 8:7-8.

6. Charge Off of Customer A/R

Q. **PLEASE RESPOND TO MR. FORMATO'S REBUTTAL TESTIMONY ADDRESSING YOUR ADJUSTMENT TO THE CHARGE OFF OF CUSTOMER ACCOUNTS RECEIVABLE.**

A. In my direct testimony, I made an adjustment to remove the "Charge Off of Customer Accounts Receivable" expense account from the cost of service because the nature of the costs included in this account was unknown. My concern was to avoid including costs that were duplicative of the costs included in the Uncollectible Expense account. I then requested NFG to fully explain the nature of this account in its rebuttal testimony.

In Mr. Formato's rebuttal testimony, he explained that the Charge Off of Customer Accounts Receivable is a separate and distinct type of write-off that does not include the financial write-offs for non-payment which are recovered through the Uncollectible Expense.[13] In his explanation, examples were provided to provide additional insight on these costs.[14]

Based on the explanation in Mr. Formato's rebuttal testimony, I will withdraw my adjustment because I do not believe the costs in the "Charge Off of Customer Accounts Receivable" expense account is duplicative of the Uncollectible Expense account.

7. Uncollectible Expense

Q. **DID THE COMPANY RESPOND TO YOUR ADJUSTMENT TO UNCOLLECTIBLE EXPENSE?**

A. No. In my direct testimony, I explained that an uncollectible factor of 1.53% was calculated based on the three-year uncollectible ratio that was calculated from the

[13] Rebuttal Testimony of Anthony T. Formato at 4:17-18.
[14] Rebuttal Testimony of Anthony T. Formato at 4:18-20.

historical data. NFGD then included a 0.02% management adder which increased the uncollectible factor to 1.55%. I recommended an adjustment to remove the .02% management adder in my direct testimony. However, the Company did not address this issue in its rebuttal testimony. Nevertheless, I continue to disagree with NFGD's approach and recommend that the Commission change the uncollectible factor to the 1.53%, which is based on the historical data. I am also continuing to recommend that the Commission reduce the uncollectible expense and the uncollectible factor included in the revenue requirement gross up factor to reflect the 1.53% uncollectible factor. On Exhibit LKM-13A, I present this adjustment which reduces operating expenses by $73,000.

8. Office Employee Expenses

Q. **PLEASE RESPOND TO MR. FORMATO'S DISAGREEMENT WITH YOUR ADJUSTMENT TO REMOVE THE COMPOUND GROWTH ADJUSTMENT FROM OFFICE EMPLOYEE EXPENSE.**

A. In my direct testimony, I recommended an adjustment to reverse the Company's adjustment to escalate Office Employee Expenses using a compound growth rate of 3.67% based on the FY 2023 to FY 2025 period. I indicated that I was recommending an adjustment to remove the increase in this expense line item because this approach is inconsistent with my understanding of the zero-based budgeting approach that NFG witness Formato claims the Company uses for its operating budget.

In Mr. Formato's rebuttal testimony, he disagrees with my adjustment stating that the Office Employee Expenses line item is primarily made up of software, office equipment and employee training and travel expenses, which are subject to inflationary price increases. He argues that the Company will not be able to negotiate terms which

would allow for flat prices for two years, which is what I am suggesting by not allowing for inflationary growth on this line item between the HTY and the FPFTY.

Mr. Formato's explanation is inaccurate. The portion of these costs that were related to software and office equipment were separate from the costs that were identified as Normalized Office Expense. The Computer-related costs were adjusted to reflect a full year related to the Consolidated Oracle DBMS & Exadata licensing. To my knowledge, those costs were not escalated by a compound annual growth rate (CAGR), and I did not adjust them. Therefore, Mr. Formato's claim that the Company will not be able to negotiate terms which would allow for flat prices for two years is not applicable to the CAGR adjustment.

With respect to the remaining Normalized Office Expenses, the Company describes the adjustment as an inflation adjustment but uses a CAGR to escalate the costs. There are three reasons I disagree with the use of an inflation escalation for projecting the FPFTY expenses. First, the CAGR is not an inflation escalation rate. Instead, it captures the changes in expenses from two points in time. It does not separate the change in the unit prices from changes in quantities. Hence, it combines changes in unit prices and quantities. As a result, it is unclear whether the increase in expenses are driven by the unit prices or the quantities.

Second, if the Company's intent was to capture inflation, the annual inflation rate would have been more appropriate than the CAGR because it would capture the changes between each year rather than the two points in time that is captured by the CAGR.

Third, I disagree with the use of inflation escalation solely as the basis of determining the FPFTY level of expenses. These inflationary adjustments are not

known and measurable because they are blanket cost increases. More importantly, for ratemaking purposes, the costs and cost increases included in the cost of service should be related to the specific activities, initiatives, and plans that the Company intends to undertake during the rate effective period. Those costs should be based upon evidence or documentation that can be identified, supported, and calculated with a degree of certainty. The inflation escalation does none of those things.

Therefore, I am recommending that the Commission reject the Company's inflation adjustment. On Exhibit LKM-10A, I present this adjustment which reduces operating expenses by $64,000.

9. Postage Expense

Q. **PLEASE RESPOND TO THE COMPANY'S DISAGREEMENT WITH YOUR ADJUSTMENT TO POSTAGE EXPENSE.**

A. In my direct testimony, I explained my adjustment to postage expense to reflect the 4.8% scheduled postage rate increase that was announced by the USPS. NFG disagrees with my adjustment stating:

> While neither OCA nor the Company can predict future postage rates, it is clear that postage rates continue to rise. By July of 2026, a first-class stamp, which was $0.60 at the start of January 2023, will be $0.82. Even with these increases, the USPS is still facing significant financial challenges and continues to warn of additional increases beyond July of 2026. As such, the Company feels that OCA's adjustment stops short and does not include likely increases in January and July of 2027.[15]

I disagree with the Company's approach to deriving the postage expense because it depends on speculation of the postage rate increase. Whatever problems the USPS faces, it would be inappropriate to use an escalation rate that is not known or certain. It

[15] Rebuttal Testimony of Anthony T. Formato at 6:11-16.

is also not appropriate to use historical price increases to forecast future postal increases because those rates were set to recover specific costs at the time they were increased. Therefore, past postage rate increases are not indicative of the level of future rate increases. As a result of the foregoing, the Commission should reject the Company's proposed increase in postage expense because it is speculative. I present my adjustment, which reduces operating expenses by $175,000, on Exhibit LKM-14A.

10. Insurance Settlement Proceeds

Q. **PLEASE RESPOND TO THE COMPANY'S DISAGREEMENT WITH YOUR ADJUSTMENT TO INSURANCE SETTLEMENT PROCEEDS.**

A. In my direct testimony, I recommended that a regulatory liability from an insurance settlement and held on NFGD's Balance Sheet be returned to customers over a three-year period.

Mr. Formato disagrees with my recommendation, stating that my recommendation has two fundamental flaws.[16] First, he claims that the balance in this account is being reduced as the Company processes environmental expenses. Second, he states that if the insurance regulatory liability is flowed-back to ratepayers, a normalizing adjustment would be needed to reestablish the environmental expense that ratepayers were "shielded from" because of the regulatory liability account.[17] Mr. Formato proposes to continue NFG's practice of using the insurance settlement proceeds to offset new environmental expenses.[18]

Mr. Formato's claim that there are flaws in my adjustment is misleading, and he mischaracterizes my adjustment when he claims that my recommended adjustments have "flaws." To be clear, characterizing my adjustment as containing flaws implies

[16] Rebuttal Testimony Anthony T. Formato at 11:6-15.
[17] *Id.*
[18] *Id.*

that there is something incorrect in adjustment. In fact, there is no flaw in the adjustment; I have simply chosen to flow back ratepayer funds on different terms than the Company has been doing. What Mr. Formato characterizes as flaws is his recognition of the changes from the status quo if my adjustment is accepted with respect to accounting for the funds in the regulatory liability account.

Q. **HOW ARE RATEPAYERS AFFECTED BY NOT FLOWING BACK THE INSURANCE SETTLEMENT FUNDS?**

A. First off, the insurance settlement funds are ratepayers' funds to which they are entitled.[19] If the Company continues to hold these funds, the Company has use of nearly $798,079[20] cost-free, and ratepayers lose the time value of these funds because the Company is not currently accruing any carrying charges. This is unfair to ratepayers. Moreover, using the amount presented in my adjustment on Exhibit LKM-9A, rates from this proceeding will be $266,000 lower than proposed by the Company. To avoid the loss of value to the ratepayers, the Commission should reject the position taken by the Company as explained in Mr. Formato's rebuttal testimony.

Q. **IF THE COMMISSION DOES NOT ACCEPT YOUR ADJUSTMENT, WILL NFG ACCRUE CARRYING CHARGES ON THESE CUSTOMER FUNDS THAT IT HOLDS UNTIL THEY ARE RETURNED TO CUSTOMERS?**

A. No. NFG has stated that "[t]he Company does not intend to accrue carrying charges on these funds as they will be used to cover future environmental costs. In general, regulatory liabilities and assets do not accrue carrying costs."[21] While it may be true that generally regulatory liabilities do not accrue carrying charges, based on my

[19] NFG Filing Book I, Responses to Section 53.53 - III-F.8, Footnote 4.
[20] In my direct testimony, I presented $936,000 as the amount to flow back based on the HTY as shown in NFG's filing (Book I, Responses to Section 53.53 - III-F.8, Footnote 4). In response to OCA 19-1, NFG provided the updated amount as of $798,079.
[21] OCA 19-1(d).

experience, I am aware that the Commission has the authority to require the Company to accrue carrying charges on customer funds that it holds until returned to customers. Moreover, how the funds are to be returned in the future (i.e., by offsetting environmental expenses, or by reducing the cost of service) is irrelevant to whether carrying charges are accrued. Hence, if the Commission does not accept my adjustment to flow back the insurance settlement funds to customers, as a matter of fairness and equity, NFG must be required to accrue carrying charges because the Company has free use of these funds until they are exhausted. Therefore, if the Commission agrees with the Company's approach of using the insurance settlement funds it holds to offset future environmental expenses, then carrying charges must be accrued because it is unknown how long the Company will have use of these funds.

In fact, it should be recognized that rather than recommend that the insurance settlement funds be flowed back over the three years with carrying charges, I have chosen to moderate my adjustment to reduce the level of controversy around this issue by not recommending carrying charges be included in my adjustment to flow back the insurance settlement funds.

Q. **DID YOU NORMALIZE THE ENVIRONMENTAL EXPENSE AS MR. FORMATO SUGGESTED IN HIS REBUTTAL TESTIMONY?**[22]

A. No. In OCA 19-1, NFG was asked to provide the normalized environmental expense assuming the insurance proceeds are passed back to customers. NFG responded stating:

> If the insurance proceeds were passed back to customers, the normalized environmental expense for the HTY would have been the filed environmental expense of $52,546 + $144,486 (HTY activity in regulatory liability account # 254020), for a total of $197,032. The HTY value would have been held flat for the FPFTY. The Company proposes to reduce the FPFTY claim by $52,546 as it will use the

[22] Rebuttal Testimony Anthony T. Formato at 11:6-15.

> remaining regulatory liability balance to cover any future environmental expenses.[23]

The $197,032 provides as the normalized expense for the HTY is not the normalized expense. It represents the activity for only one year, which could be unusually high or low. Typically, expense normalization before this Commission ranges between three to five years to establish a normalized expense level. So, I cannot accept one year's activity as the normalized level of expense.

11. Other Expense-Line Hit Collections

Q. **PLEASE RESPOND TO THE COMPANY'S DISAGREEMENT WITH YOUR ADJUSTMENT TO OTHER EXPENSE-LINE HIT COLLECTIONS.**

A. In my direct testimony, I recommended an adjustment to reverse the Company's adjustment to increase "Other Expense-Line Hit Collections" because the Company's adjustment only accounts for the expense side of the costs and revenues in connection with the recovery of damage to the Company's gas lines.

In Mr. Formato's rebuttal testimony, he states:

> OCA proposed to move away from the Company's three-year average approach with respect to line hit collections. OCA's proposal to simply use the HTY value rather than a three-year average (FY23-FY25) results in a reduction of $156,000 to the Other Expense line item as collections were higher in the HTY as compared to the other two years used in the three-year average calculation. OCA's claim is based on the belief that a period that exhibits high line hit collections, like the HTY, would also have higher repair expenses in that year such that the higher expense and higher collections act as a natural offset.[24]

Mr. Formato's explanation (above) demonstrates that he misunderstands my adjustment. The intent of my adjustment is not to move away from the 3-year

[23] OCA 19-1(c).
[24] Rebuttal Testimony Anthony T. Formato at 6:20 - 7:4.

normalization concept. I also did not assume that a period that experienced high line hit collections would also have higher repair expenses in the same year to act as a natural offset. The intent of my adjustment is to recognize that the Company is attempting to normalize an expense account that contains two interrelated components – one is an expense and the other is a reimbursement of expenses (expense offsets).

In this instance, NFG is attempting to normalize only the reimbursements without also normalizing the expenses. This approach is one-sided. The Company has provided no evidence to show that the expenses in the account are not unusually high, even though I have challenged the collections claim.

Mr. Formato argues that line hit collections have a significant lag such that the recovery from third parties routinely crosses over fiscal years from the incidents themselves.[25] However, this claim supports my adjustment. Because of the lag between when the cost is incurred and when the reimbursement is received, the probability that expenses recorded in the account could be higher than normal increases.

I also disagree with Mr. Formato that because the primary cost being recovered is labor, my argument falls apart because labor has been annualized.[26] This argument ignores the costs associated with materials, overheads, contractors, permits, etc.

In short, I disagree with the Company's position unless it can demonstrate that the overall account has not been overstated by its decision to annualize only one component of the net costs recorded in the account. On Exhibit LKM-11A, I present this adjustment which reduces O&M expenses by $156,000.

[25] Rebuttal Testimony Anthony T. Formato at 7:7-9.
[26] Rebuttal Testimony Anthony T. Formato at 7:16-19.

12. Economic Development Expense

Q. **PLEASE RESPOND TO THE COMPANY'S DISAGREEMENT WITH YOUR ADJUSTMENT TO ECONOMIC DEVELOPMENT EXPENSE.**

A. In my direct testimony, I recommended an adjustment to remove membership fees and dues related to economic development entities because I find that those memberships and activities have very little to do with providing utility service to current ratepayers and are more closely aligned to corporate image building.[27] Moreover, I believe economic development is not a function of a public utility Instead, economic development initiatives are more aligned with governmental functions and responsibilities. Moreover, in the description of each of the organizations to whom NFG pays dues and contributions,[28] it is apparent that these organizations are quasi-governmental and philanthropic in nature. They are not potential large-use customers whose revenues will impact the recovery of fixed costs nor attract complementary businesses that become customers of NFG.

Mr. Formato argues that economic growth helps to retain and attract commercial and industrial use of natural gas. He believes participation in these organizations ensures energy infrastructure, safety, and reliability considerations are incorporated into local growth planning, thereby reducing long term system risks and costs.[29] In my opinion, unless NFG can demonstrate that the local governments are unable, the utility's involvement and awareness of local growth planning of energy infrastructure, safety, and reliability considerations should occur even if NFG were not a member of these economic development organizations. This is because part of the

[27] Direct Testimony of Lafayette K. Morgan Jr. at 21:8-11.
[28] Direct Testimony of Lafayette K. Morgan Jr. at 20:1-21-7.
[29] Rebuttal Testimony of Anthony T. Formato at 8:17-21.

functions of a utility's marketing department is to stay abreast of local development initiatives in order to capture new customers.

Based on the foregoing, I believe that my position that the economic development fees are more related to charitable contributions and less related to economic development is supported. Therefore, the Commission should reject the Company's position on the inclusion of these costs in the cost of service. On Exhibit LKM-15A, I present this adjustment which reduces O&M expenses by $17,000.

13. Pennsylvania Corporate Income Tax

Q. **PLEASE RESPOND TO COMPANY'S DISAGREEMENT WITH YOUR ADJUSTMENT TO THE PENNSYLVANIA CORPORATE INCOME TAX?**

A. In my direct testimony, I used the 2027 tax rate of 6.99% to calculate the Pennsylvania Corporate Net Income Tax based on my expectation that the Company would be subject to the 2027 tax rate for most of the FPFTY. NFG witness Erica L. Forcucci has explained that because of NFG's fiscal year, the Company will not be subject to the 2027 tax rate of 6.99% until October 1, 2027. Therefore, I have revised my tax calculation and the revenue gross up factor to reflect the 7.49% instead of the 6.99%.

Q. **DOES THIS COMPLETE YOUR SURREBUTTAL TESTIMONY?**

A. Yes, it does.

OCA Statement 2SR

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION		
V.	:	DOCKET NO. 2025-3059428
NATIONAL FUEL GAS DISTRIBUTION CORPORATION PENNSYLVANIA DIVISION	:	

EXHIBITS ACCOMPANYING THE
SURREBUTTAL TESTIMONY OF
LAFAYETTE K. MORGAN, JR.

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION		
V.	:	DOCKET NO. 2025-3059428
NATIONAL FUEL GAS DISTRIBUTION CORPORATION PENNSYLVANIA DIVISION	:	

Exhibit LKM Set A

National Fuel Gas Distribution Corporation

Summary of Operating Income
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Company Amounts at Present Rates	OCA Adjustments	Amounts After OCA Adjustments	Pro Forma Change in Revenues	Amounts After Change in Revenues
		(1)	(2)	(3)	(4)	(5)
1	Total Operating Revenues					
2	Customer & Distribution Revenue	$ 139,680 [1/]	$ -	$ 139,680	$ -	$ 139,680
3	Gas Supply & Cost Adjustment Revenue	124,571 [1/]	12	124,583	-	124,583
4	Other Revenues	1,273 [1/]	-	1,273	22 [5/]	1,295
5	Increase in Service Revenue	-	-	-	4,283	4,283
6	Total Revenues	265,524	12	265,536	4,305 [6/]	269,841
7						
8	Total Operating Expenses					
9	Operation & Maintenance Expenses	204,049	(1,250)	202,798	66	202,864
10	Depreciation & Amortization Expense	25,302 [2/]	(4,670)	20,632	-	20,632
11	Taxes Other Than Income Taxes	2,489 [3/]	-	2,489	-	2,489
12	Total Operating Expenses	231,839 [4/]	(5,920)	225,919	66	225,985
13						
14	Operating Income Before Income Taxes	33,684	5,933	39,617	4,239	43,856
15						
16	Income Taxes:					
17	State	(330)	283	(47)	322	275
18	Federal	(2,010)	733	(1,277)	823	(454)
19	Total Income Taxes	(2,340)	1,016	(1,324)		(179)
20						
21	Net operating income Before Income Tax	$ 36,024	$ 4,917	$ 40,941	$ 4,239	$ 44,035
22						
23	Rate Base	$ 571,456		$ 574,917		$ 574,917
24						
25	Return On Rate Base	6.30%		7.12%		7.66% [6/]

Notes:

[1/] Company FPFTY Schedule A-1.

[2/] Company FPFTY Schedule D-1, Line 15.

[3/] Company FPFTY Schedule D-1, Line 16.

[4/] Company FPFTY Schedule D-1, Line 17.

[5/] Exhibit LKM -6A

[6/] Calculated at OCA Recommended ROR.

National Fuel Gas Distribution Corporation

Summary of Revenue Increase at OCA Rate of Return
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description		Amount	Source
1	Adjusted Rate Base		$ 574,917	Exhibit LKM-2, Page 1
2	Required Rate of Return		7.660%	Exhibit LKM -19A-SR
3				
4	Net Operating Income Required		$ 44,039	
5	Net Operating Income at Present Rates		40,941	Exhibit LKM-1, Page 1
6				
7	Income Deficiency/(Surplus)		$ 3,098	
8	Revenue Multiplier		1.389570	1/
9				
10	Required Change in Company Revenue		$ 4,305	
11				
12	Proposed Revenue Change		$ 4,305	
13	Less: Uncollectible	1.53%	$ 66	
14	Less: State Income Tax	7.49%	322	
15				
16	Income Before Federal Taxes		$ 3,917	
17	Federal Income Tax	21.00%	823	
18				
19	Income Deficiency/(Surplus)		$ 3,094	

1/ Revenue Conversion Factor

Gross Revenue Factor	1.000000
Uncollectible Expense	-0.015300
State Taxable Income	0.984700
State Income Tax @7.49%	-0.073754
Federal Taxable Income	0.910946
Federal Income Tax @ 21%	-0.191299
Net Operating Income Factor	0.719647
Revenue Conversion Factor	1.389570

National Fuel Gas Distribution Corporation

Summary of Rate Base
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount per Company Filing [1/]	OCA Adjustments [2/]	Amount After OCA Adjustments
		(1)	(2)	(3)
1	Utility Plant	$ 957,237	$ -	$ 957,237
2	Accumulated Depreciation	(320,571)	4,670	(315,901)
3	Net Plant in Service	636,667	4,670	641,337
4	Working Capital	6,715	(1,195)	5,520
5	Gas Inventory	5,664	-	5,664
6	Accumulated Deferred Income Taxes	(73,925)	-	(73,925)
7	Customer Deposits	(5,166)	-	(5,166)
8	Contribution in Aid of Construction	(25)	(20)	(45)
9	Customer Advances	(61)	7	(54)
10	Materials & Supplies	1,587	-	1,587
11				
12	Total Rate Base	$ 571,456	$ 3,462	$ 574,917

Notes:

[1/] Company Schedule C-1, FPFTY.

[2/] Exhibit LKM - 2A, Page .2

National Fuel Gas Distribution Corporation

Summary of Rate Base Adjustments
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Source	Amount
1	Rate Base per Company Filing	Exhibit LKM-3A-SR	$ 571,456
2	OCA Adjustments:		
3	Adjustment to Cash Working Capital	Exhibit LKM-4A-SR	(1,195)
4	Adjustment to Include CIAC	Exhibit LKM-5A-SR	(20)
5	Adjustment to Include Customer Advances	Exhibit LKM-5A-SR	7
6	Adjustment to Accumulated Depreciation to Reflect OCA Recommended Depreciation Rates	Exhibit LKM-17A-SR	4,670
7			
8	Total Ratemaking Adjustments		$ 3,462
9	Adjusted Rate Base per OCA		$ 574,917

National Fuel Gas Distribution Corporation

Summary of Adjustments to Income Before Income Taxes
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount	Source
1	Operating Income per Company	$ 36,024	Exhibit LKM - 1A-SR
2			
3	OCA Adjustments:		
4	Reflect Growth in Rent From Gas Property	$ 9	Exhibit LKM-3A-SR Pg. 2
5	Remove Stock-Based Compensation	1,045	Exhibit LKM-3A-SR Pg. 2
6	Amortize Insurance Settlement Proceeds	194	Exhibit LKM-3A-SR Pg. 2
7	Remove Office Employee Inflation Adjustment	47	Exhibit LKM-3A-SR Pg. 2
8	Remove Other Expense -Line Hit Collections	114	Exhibit LKM-3A-SR Pg. 2
9	Remove Charge Off Of Customer A/R	-	Exhibit LKM-3A-SR Pg. 2
10	Normalize Uncollectible Expense	54	Exhibit LKM-3A-SR Pg. 2
11	Reflect Postage Rate Increase	128	Exhibit LKM-3A-SR Pg. 2
12	Remove Economic Development	13	Exhibit LKM-3A-SR Pg. 2
13	Include Customer Payment Transaction Costs	(679)	Exhibit LKM-3A-SR Pg. 2
14	Reflect OCA Recommended Depreciation Rates	3,413	Exhibit LKM-3A-SR Pg. 2
15	Interest Synchronization Adjustment	579	Exhibit LKM-3A-SR Pg. 2
16	Total OCA Adjustments	4,917	
17	Total OCA Adjustments	$ 40,941	

National Fuel Gas Distribution Corporation

Summary of Adjustments to Operating Income
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Operating Revenues	O&M Expenses	Depreciation & Amortization	Taxes Other Than Income	State Income Taxes	Federal Income Taxes	Operating Income
1	Amount per Company	$ 265,524	$ 204,049	$ 25,302	$ 2,489	$ (330)	$ (2,010)	$ 36,024
2								
3	OCA Adjustments:							
4	Reflect Growth in Rent From Gas Property	$ 12	$ -	$ -	$ -	$ 1	$ 2	$ 9
5	Remove Stock-Based Compensation	-	(1,430)	-	-	107	278	1,045
6	Amortize Insurance Settlement Proceeds	-	(266)	-	-	20	52	194
7	Remove Office Employee Inflation Adjustment	-	(64)	-	-	5	12	47
8	Remove Other Expense -Line Hit Collections	-	(156)	-	-	12	30	114
9	Remove Charge Off Of Customer A/R	-	-	-	-	-	-	-
10	Normalize Uncollectible Expense	-	(73)	-	-	5	14	54
11	Reflect Postage Rate Increase	-	(175)	-	-	13	34	128
12	Remove Economic Development	-	(17)	-	-	1	3	13
13	Include Customer Payment Transaction Costs	-	930	-	-	(70)	(181)	(679)
14	Reflect OCA Recommended Depreciation Rates	-	-	(4,670)	-	350	907	3,413
15	Interest Synchronization Adjustment	-	-	-	-	(161)	(418)	579
16	Total OCA Adjustments	$ 12	$ (1,250)	$ (4,670)	$ -	$ 283	$ 733	$ 4,917
17	Total Adjusted Income Before Income Taxes	$ 265,536	$ 202,798	$ 20,632	$ 2,489	$ (47)	$ (1,277)	$ 40,941

National Fuel Gas Distribution Corporation
Adjustment to Cash Working Capital
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount	
1	Working Capital for O&M Expenses	$ 7,340	1/
2	Interest Payments	(1,938)	2/
3	Tax Payment Lag Calculations	158	3/
4	Prepaid Expenses	-	
5			
6	OCA Total Working Capital Requirements	$ 5,560	
7	Company Total Working Capital Requirements	6,755	3/
8	Adjustment to Cash Working Capital	$ (1,195)	

Notes
1/ Exhibit LKM-5 , Page 2
2/ Exhibit-5 , Page 3
3/ Schedule C-4, Page 1

National Fuel Gas Distribution Corporation

Summary Calculation of Cash Working Capital
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Test Year Expenses per Co.	1/ OCA Adjustments	Adjusted Test Year Expenses	Lead/Lag Days 1/	Weighted Average	Totals
	WORKING CAPITAL REQUIREMENT						
1	Revenue Lag Days						47.16
2	Expense Lag Days						
3	Purchased Gas Costs	$ 124,571	$ -	$ 124,571	39.83	$ 4,961,646	
4	Other Expenses (less Uncollectible)	35,748	(15)	35,763	41.01	1,466,638	
5	Payroll (Net Labor)	40,592	(1,430)	42,022	10.32	433,663	
6							
7	Total	$ 200,911	$ (1,444)	$ 202,355		$ 6,861,947	
8							
9	O & M Expense Lag Days						33.91
10	Net (Lead) Lag Days						13.25
11							
12	Operating Expenses Per Day						$ 554
13							
14	Working Capital for O & M Expense						$ 7,340

Notes
1/ Schedule C-4, Page 2

National Fuel Gas Distribution Corporation

Calculation of Cash Working Capital Interest Component

For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Reference Or Factor	# of Days	# of Days	Total
1	FPFTY Rate Base	Exhibit LKM - 2A-SR			$ 574,917
2	Long-term Debt Ratio	Exhibit LKM -19A-SR			50.00%
3	Embedded Cost of Long-term Debt	Exhibit LKM -19A-SR			5.58%
4	Pro forma Interest Expense	L 1 * L 2 * L 3			$ 16,040
5					
6	Daily Amount	L 4 / L 5 [Col 2]	365		$ 44
7	Days to mid-point of interest payments			91.25	
8	Less: Revenue Lag Days	NFGD Schedule C-4, Page 1		47.16	
9	Interest Payment lag days	L 7 - L 6			(44.1)
10	Total Interest for Working Capital	L 5 * L 8			$ (1,938)

National Fuel Gas Distribution Corporation

Adjustment to Operating Expenses for CWC prurposes
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	Non Cash Expenses	
2	Remove Stock-Based Compensation	(1,430)
3	Injuries and Damages	(180)
4	Rate Case Expense	(344)
5	Cost of Service Adjustments	
6	Remove Office Employee Inflation Adjustment	(156)
7	Remove Other Expense -Line Hit Collections	-
8	Remove Charge Off Of Customer A/R	(73)
9	Reflect Postage Rate Increase	(175)
10	Remove Economic Development	(17)
	Adjustment to Include Customer Payment Transaction Costs	930
11	Total Adjustment	$ (1,444)

National Fuel Gas Distribution Corporation

Adjustment to Reflect Contributions in Aid of Construction
and Customer Advances for Construction
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Month	Contributions in Aid of Construction [1/]	Customer Advances for Construction [1/]
1	Feb-25	$ 5,325	$ 61,169
2	Mar-25	8,800	60,353
3	Apr-25	-	60,353
4	May-25	17,344	60,353
5	Jun-25	15,003	60,353
6	Jul-25	22,082	60,353
7	Aug-25	-	60,353
8	Sep-25	6,000	48,645
9	Oct-25	24,350	48,645
10	Nov-25	-	48,645
11	Dec-25	480,417	48,645
12	Jan-26	-	43,874
13	Feb-26	11,038	43,058
14	13-Month Average ($000)	45	54
15	Company Amount	25 [2/]	61 [2/]
16	Adjustment to Rate Base	$ (20)	$ 7

Notes:
[1/] OCA 10-7 Attachment 1

R-2025-3059428
Exhibit LKM -6A-SR

National Fuel Gas Distribution Corporation

Calculation of Forfieted Discount Percentage
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.		Description	Twelve Months Ended 9/30/2023	Twelve Months Ended 9/30/2024	Twelve Months Ended 9/30/2025
		Gas Service Revenue:			
1	480.0	Residential Sales	$ 200,708	$ 140,127	$ 163,839
2	481.1	Commercial Sales	31,557	20,092	25,583
3	481.2	Industrial Sales	2,745	1,460	2,054
4	481.3	Public Authority Sales	2,302	1,270	1,640
	489.3	Transportation -Dist. Facilities	36,160	41,530	45,231
5			$ 273,471	$ 204,478	$ 238,348
6					
7	487.0	Forfeited Discounts	1,373	1,077	1,146
8					
9		Forfeited Discounts Ratio	0.502%	0.527%	0.481%
10					
11		3-Year Average			0.503%
12					
13		Calculated Increase in Revenues			$ 4,305
14					
15		Increase in Forfieted Discount relate to Revenue Increase			$ 22

Notes:
1/ OCA 10-20

R-2025-3059428
Exhibit LKM -7A-SR

National Fuel Gas Distribution Corporation

Adjustment to Rent From Gas Property
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	Twelve Months Ended 9/30/2023	$ 89
2	Twelve Months Ended 9/30/2024	92
3	Twelve Months Ended 9/30/2025	100
4	Average Growth Factor	1.0603
5	HTY Rent From Gas Property	$ 100
6	FTY Rent From Gas Property	$ 106
7	Average Growth Factor	1.0603
8	FPFTY Rent From Gas Property per OCA	$ 112
9	FPFTY Rent From Gas Property per NFG	100
10	Adjustment to Other Operating Revenue	$ 12

Notes:
[1/] OCA 10-20

R-2025-3059428
Exhibit LKM -8A-SR

National Fuel Gas Distribution Corporation

Adjustment to Stock Based Compensation
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	FPFTY Stock Based Compensation Rate Year Oct. 2027	$ 1,430 [1/]
2	Adjustment to Operating Expenses	$ (1,430)

Notes:
[1/] Exhibit MPW-1, Schedule 2, Page 14.

R-2025-3059428
Exhibit LKM -9A-SR

National Fuel Gas Distribution Corporation

Adjustment to Amortize Insurance Settlement Proceeds
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	NFG Office Employee Expense Inflation Adjustment	$ 798
2	Amortization Period	3
3	Adjustment to Operating Expenses	$ (266)

Notes:
[1/] Information Submitted Pursuant to Section 53.51 et seq of the Commission's Regulations, III-F.8, Page 2.

R-2025-3059428
Exhibit LKM -10A-SR

National Fuel Gas Distribution Corporation

Adjustment to Office Employee Inflation Adjustment
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	NFG Office Employee Expense Inflation Adjustment	$ 64
2	Adjustment to Operating Expenses	$ (64)

Notes:
[1/] OCA 10-20

R-2025-3059428
Exhibit LKM -11A-SR

National Fuel Gas Distribution Corporation

Adjustment to Other Expense -Line Hit Collections
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	NFG Line Hit Collection Adjustment	$ 156
2	Adjustment to Operating Expenses	$ (156)

Notes:
[1/] ATF-2, Schedule 4.

R-2025-3059428
Exhibit LKM -12A-SR

National Fuel Gas Distribution Corporation

Adjustment to Remove Charge Off Of Customer A/R
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	Charge Off Of Customer A/R	$ -
2	Adjustment to Operating Expenses	$ -

Notes:
[1/] I&E-RE-D-25.

R-2025-3059428
Exhibit LKM -13A-SR

National Fuel Gas Distribution Corporation

Adjustment to Uncollectible Expense
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount	
1	Revenue at Presaent Rates	$ 264,263	1/
2	Uncollectible Factor	1.53%	2/
3	Uncollectible Expense per OCA Before CAP Forgiveness	$ 4,043	
4	Uncollectible Expense per NFG Before CAP Forgiveness	4,116	3/
5	Adjustment to Operating Expenses	$ (73)	

Notes:

1/ Exhibit LKM-1, Column (3), Lines 2+3.

2/ National Fuel Exhibit ATF-3, Schedule 1 (excludes Management Adj.)

3/ National Fuel Exhibit ATF-3, Schedule 1, line 9.

R-2025-3059428
Exhibit LKM -14A-SR

National Fuel Gas Distribution Corporation

Adjustment to Postage Expense
For the Fully Projected Future Test Year Ended July 31, 2024
($ in Thousands)

Line No.	Description	Amount
1	HTY Normalized Postage Expense	$ 1,225 [1/]
2	Planned Postage Rate Increase	104.8%
3	Pro Forma Posatge Expense	$ 1,284
4	FPFTY Adjusted Postage Expense	1,459 [1/]
5	Adjustment to Operating Expenses	$ (175)

Notes:
[1/] National Fuel Exhibit ATF-1.

R-2025-3059428
Exhibit LKM -15A-SR

National Fuel Gas Distribution Corporation

Adjustment to Remove Economic Development
Dues and Memberships
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	Economic Development Dues and Memberships	$ 17 [1/]
2	Adjustment to Operating Expenses	$ (17)

Notes:
[1/] OCA 10-34.

National Fuel Gas Distribution Corporation

Adjustment to Include Customer Payment Transaction Costs
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	Customer Payment Transaction Costs	$ 930 [1/]
2	Adjustment to Operating Expenses	$ 930

Notes:
[1/] OCA Set 7-4 attachment.

National Fuel Gas Distribution Corporation

Adjustment to Reflect OCA Recommended Depreciation Rates
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	OCA Adjustment to Depreciation Expense	$ 4,670 [1/]
2	Adjustment to Operating Expenses	$ (4,670)
3	Adjustment to Accumulated Depreciation	$ 4,670

Notes:
[1/] OCA Set 7-4 attachment.

R-2025-3059428
Exhibit LKM -18A-SR

National Fuel Gas Distribution Corporation

Interest Synchronization Adjustment
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount	
1	Adjusted Rate Base	$ 574,917	1/
2	Weighted Cost of Debt	2.790%	
3	Adjusted Interest Deduction	$ 16,040	
4	Interest Deduction Per Company	13,889	2/
5	Adjustment to Synchronize Interest Expense	$ 2,151	
6	Effective State Income Tax Rate	7.49%	
7	Adjustment to State Income Taxes	$ (161)	
8	Federal Income Tax Base	$ 1,990	
9	Federal Income Tax Rate	21.00%	
10	Adjustment to Federal Income Taxes	$ (418)	

Notes:
1/ Exhibit LKM-2, Page 1.
2/ Company Schedule D-11, FPFTY.

R-2025-3059428
Exhibit LKM -19A-SR

National Fuel Gas Distribution Corporation

Calculation of Rate of Return at OCA Recommended
ROE and Capital Structure
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Capitalization Ratio	Cost Rate	Weighted Cost
1	Long-Term Debt	50.00%	5.58%	2.79%
2	Short-Term Debt	0.00%	0.00%	0.00%
3	Total Debt	50.00%		2.79%
4				
5	Common Equity	50.00%	9.74%	4.87%
6				
7	Total	100.00%		7.66%

Source:
Per OCA Witness Reno

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION		
V.	:	DOCKET NO. 2025-3059428
NATIONAL FUEL GAS DISTRIBUTION CORPORATION PENNSYLVANIA DIVISION	:	

Exhibit LKM Set B

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

National Fuel Gas Distribution Corporation

Summary of Operating Income
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Company Amounts at Present Rates	OCA Adjustments	Amounts After OCA Adjustments	Pro Forma Change in Revenues	Amounts After Change in Revenues
		(1)	(2)	(3)	(4)	(5)
1	Total Operating Revenues					
2	Customer & Distribution Revenue	$ 139,680 [1/]	$ -	$ 139,680	$ -	$ 139,680
3	Gas Supply & Cost Adjustment Revenue	124,571 [1/]	12	124,583	-	124,583
4	Other Revenues	1,273 [1/]	-	1,273	21 [5/]	1,295
5	Increase in Service Revenue	-	-	-	4,184	4,184
6	Total Revenues	265,524	12	265,536	4,205 [6/]	269,741
7						
8	Total Operating Expenses					
9	Operation & Maintenance Expenses	204,049	(1,250)	202,798	64	202,863
10	Depreciation & Amortization Expense	25,302 [2/]	(4,670)	20,632	-	20,632
11	Taxes Other Than Income Taxes	2,489 [3/]	-	2,489	-	2,489
12	Total Operating Expenses	231,839 [4/]	(5,920)	225,919	64	225,983
13						
14	Operating Income Before Income Taxes	33,684	5,933	39,617	4,141	43,758
15						
16	Income Taxes:					
17	State	(330)	436	106	315	421
18	Federal	(2,010)	1,131	(879)	803	(76)
19	Total Income Taxes	(2,340)	1,567	(773)		345
20						
21	Net operating income Before Income Tax	$ 36,024	$ 4,366	$ 40,390	$ 4,141	$ 43,412
22						
23	Rate Base	$ 571,456		$ 575,805		$ 575,805
24						
25	Return On Rate Base	6.30%		7.01%		7.54% [6/]

Notes:

[1/] Company FPFTY Schedule A-1.

[2/] Company FPFTY Schedule D-1, Line 15.

[3/] Company FPFTY Schedule D-1, Line 16.

[4/] Company FPFTY Schedule D-1, Line 17.

[5/] Exhibit LKM -6A

[6/] Calculated at OCA Recommended ROR.

National Fuel Gas Distribution Corporation

Summary of Revenue Increase at OCA Rate of Return
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description		Amount	Source
1	Adjusted Rate Base		$ 575,805	Exhibit LKM-2, Page 1
2	Required Rate of Return		7.540%	Exhibit LKM -19B-SR
3				
4	Net Operating Income Required		$ 43,416	
5	Net Operating Income at Present Rates		40,390	Exhibit LKM-1, Page 1
6				
7	Income Deficiency/(Surplus)		$ 3,026	
8	Revenue Multiplier		1.389570	1/
9				
10	Required Change in Company Revenue		$ 4,205	
11				
12	Proposed Revenue Change		$ 4,205	
13	Less: Uncollectible	1.53%	$ 64	
14	Less: State Income Tax	7.49%	315	
15				
16	Income Before Federal Taxes		$ 3,826	
17	Federal Income Tax	21.00%	803	
18				
19	Income Deficiency/(Surplus)		$ 3,022	

1/ Revenue Conversion Factor

Gross Revenue Factor	1.000000
Uncollectible Expense	-0.015300
State Taxable Income	0.984700
State Income Tax @7.49%	-0.073754
Federal Taxable Income	0.910946
Federal Income Tax @ 21%	-0.191299
Net Operating Income Factor	0.719647
Revenue Conversion Factor	1.389570

National Fuel Gas Distribution Corporation

Summary of Rate Base
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount per Company Filing [1/]	OCA Adjustments [2/]	Amount After OCA Adjustments
		(1)	(2)	(3)
1	Utility Plant	$ 957,237	$ -	$ 957,237
2	Accumulated Depreciation	(320,571)	4,670	(315,901)
3	Net Plant in Service	636,667	4,670	641,337
4	Working Capital	6,715	(307)	6,408
5	Gas Inventory	5,664	-	5,664
6	Accumulated Deferred Income Taxes	(73,925)	-	(73,925)
7	Customer Deposits	(5,166)	-	(5,166)
8	Contribution in Aid of Construction	(25)	(20)	(45)
9	Customer Advances	(61)	7	(54)
10	Materials & Supplies	1,587	-	1,587
11				
12	Total Rate Base	$ 571,456	$ 4,350	$ 575,805

Notes:
[1/] Company Schedule C-1, FPFTY.
[2/] Exhibit LKM - 2B, Page .2

National Fuel Gas Distribution Corporation

Summary of Rate Base Adjustments
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Source	Amount
1	Rate Base per Company Filing	Exhibit LKM-3B-SR	$ 571,456
2	OCA Adjustments:		
3	Adjustment to Cash Working Capital	Exhibit LKM-4B-SR	(307)
4	Adjustment to Include CIAC	Exhibit LKM-5B-SR	(20)
5	Adjustment to Include Customer Advances	Exhibit LKM-5B-SR	7
6	Adjustment to Accumulated Depreciation to Reflect OCA Recommended Depreciation Rates	Exhibit LKM-17B-SR	4,670
7			
8	Total Ratemaking Adjustments		$ 4,350
9	Adjusted Rate Base per OCA		$ 575,805

National Fuel Gas Distribution Corporation

Summary of Adjustments to Income Before Income Taxes
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount	Source
1	Operating Income per Company	$ 36,024	Exhibit LKM - 1B-SR
2			
3	OCA Adjustments:		
4	Reflect Growth in Rent From Gas Property	$ 9	Exhibit LKM-3B-SR Pg. 2
5	Remove Stock-Based Compensation	1,045	Exhibit LKM-3B-SR Pg. 2
6	Amortize Insurance Settlement Proceeds	194	Exhibit LKM-3B-SR Pg. 2
7	Remove Office Employee Inflation Adjustment	47	Exhibit LKM-3B-SR Pg. 2
8	Remove Other Expense -Line Hit Collections	114	Exhibit LKM-3B-SR Pg. 2
9	Remove Charge Off Of Customer A/R	-	Exhibit LKM-3B-SR Pg. 2
10	Normalize Uncollectible Expense	54	Exhibit LKM-3B-SR Pg. 2
11	Reflect Postage Rate Increase	128	Exhibit LKM-3B-SR Pg. 2
12	Remove Economic Development	13	Exhibit LKM-3B-SR Pg. 2
13	Include Customer Payment Transaction Costs	(679)	Exhibit LKM-3B-SR Pg. 2
14	Reflect OCA Recommended Depreciation Rates	3,413	Exhibit LKM-3B-SR Pg. 2
15	Interest Synchronization Adjustment	28	Exhibit LKM-3B-SR Pg. 2
16	Total OCA Adjustments	4,366	
17	Total OCA Adjustments	$ 40,390	

National Fuel Gas Distribution Corporation

Summary of Adjustments to Operating Income
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Operating Revenues	O&M Expenses	Depreciation & Amortization	Taxes Other Than Income	State Income Taxes	Federal Income Taxes	Operating Income
1	Amount per Company	$ 265,524	$ 204,049	$ 25,302	$ 2,489	$ (330)	$ (2,010)	$ 36,024
2								
3	OCA Adjustments:							
4	Reflect Growth in Rent From Gas Property	$ 12	$ -	$ -	$ -	$ 1	$ 2	$ 9
5	Remove Stock-Based Compensation	-	(1,430)	-	-	107	278	1,045
6	Amortize Insurance Settlement Proceeds	-	(266)	-	-	20	52	194
7	Remove Office Employee Inflation Adjustment	-	(64)	-	-	5	12	47
8	Remove Other Expense -Line Hit Collections	-	(156)	-	-	12	30	114
9	Remove Charge Off Of Customer A/R	-	-	-	-	-	-	-
10	Normalize Uncollectible Expense	-	(73)	-	-	5	14	54
11	Reflect Postage Rate Increase	-	(175)	-	-	13	34	128
12	Remove Economic Development	-	(17)	-	-	1	3	13
13	Include Customer Payment Transaction Costs	-	930	-	-	(70)	(181)	(679)
14	Reflect OCA Recommended Depreciation Rates	-	-	(4,670)	-	350	907	3,413
15	Interest Synchronization Adjustment	-	-	-	-	(8)	(20)	28
16	Total OCA Adjustments	$ 12	$ (1,250)	$ (4,670)	$ -	$ 436	$ 1,131	$ 4,366
17	Total Adjusted Income Before Income Taxes	$ 265,536	$ 202,798	$ 20,632	$ 2,489	$ 106	$ (879)	$ 40,390

National Fuel Gas Distribution Corporation
Adjustment to Cash Working Capital
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount	
1	Working Capital for O&M Expenses	$ 6,902	1/
2	Interest Payments	(1,692)	2/
3	Tax Payment Lag Calculations	158	3/
4	Prepayments	1,080	
5			
6	OCA Total Working Capital Requirements	$ 6,448	
7	Company Total Working Capital Requirements	6,755	3/
8	Adjustment to Cash Working Capital	$ (307)	

Notes
1/ Exhibit LKM-5 , Page 2
2/ Exhibit-5 , Page 3
3/ Schedule C-4, Page 1

National Fuel Gas Distribution Corporation

Summary Calculation of Cash Working Capital
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Test Year Expenses per Co.	1/ OCA Adjustments	Adjusted Test Year Expenses	Lead/Lag Days 1/	Weighted Average	Totals
	WORKING CAPITAL REQUIREMENT						
1	Revenue Lag Days						47.16
2	Expense Lag Days						
3	Purchased Gas Costs	$ 124,571	$ -	$ 124,571	39.83	$ 4,961,646	
4	Other Expenses (less Uncollectible)	33,016	(6,713)	26,303	41.01	1,078,697	
5	Payroll (Net Labor)	40,592	(1,430)	39,162	10.32	404,157	
6							
7	Total	$ 198,179	$ (8,142)	$ 190,036		$ 6,444,500	
8							
9	O & M Expense Lag Days						33.91
10	Net (Lead) Lag Days						13.25
11							
12	Operating Expenses Per Day						$ 521
13							
14	Working Capital for O & M Expense						$ 6,902

Notes
1/ Schedule C-4, Page 2

National Fuel Gas Distribution Corporation

Calculation of Cash Working Capital Interest Component

For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Reference Or Factor	# of Days	# of Days	Total
1	FPFTY Rate Base	Exhibit LKM - 2B-SR			$ 575,805
2	Long-term Debt Ratio	Exhibit LKM -19B-SR			43.60%
3	Embedded Cost of Long-term Debt	Exhibit LKM -19B-SR			5.58%
4	Pro forma Interest Expense	L 1 * L 2 * L 3			$ 14,009
5					
6	Daily Amount	L 4 / L 5 [Col 2]	365		$ 38
7	Days to mid-point of interest payments			91.25	
8	Less: Revenue Lag Days	NFGD Schedule C-4, Page 1		47.16	
9	Interest Payment lag days	L 7 - L 6			(44.1)
10	Total Interest for Working Capital	L 5 * L 8			$ (1,692)

National Fuel Gas Distribution Corporation

Adjustment to Operating Expenses for CWC prurposes
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	Prepaid Expenses	
2	Insurance	$ (1,232)
3	PUC Assessments	(1,242)
4	AGA Dues	(142)
5	IT Services	(6,839)
6		
7	Non Cash Expenses	
8	Remove Stock-Based Compensation	(1,430)
9	Injuries and Damages	(180)
10	Rate Case Expense	(344)
11		
12	Correction of Other Expenses	2,748
13		
14	Cost of Service Adjustments	
15	Remove Office Employee Inflation Adjustment	(64)
16	Remove Other Expense -Line Hit Collections	(156)
17	Remove Charge Off Of Customer A/R	-
18	Reflect Postage Rate Increase	(175)
19	Remove Economic Development	(17)
20	Adjustment to Include Customer Payment Transaction Costs	930
21	Total Adjustment	$ (8,142)

National Fuel Gas Distribution Corporation

Adjustment to Reflect Contributions in Aid of Construction
and Customer Advances for Construction
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Month	Contributions in Aid of Construction [1/]	Customer Advances for Construction [1/]
1	Feb-25	$ 5,325	$ 61,169
2	Mar-25	8,800	60,353
3	Apr-25	-	60,353
4	May-25	17,344	60,353
5	Jun-25	15,003	60,353
6	Jul-25	22,082	60,353
7	Aug-25	-	60,353
8	Sep-25	6,000	48,645
9	Oct-25	24,350	48,645
10	Nov-25	-	48,645
11	Dec-25	480,417	48,645
12	Jan-26	-	43,874
13	Feb-26	11,038	43,058
14	13-Month Average ($000)	45	54
15	Company Amount	25 [2/]	61 [2/]
16	Adjustment to Rate Base	$ (20)	$ 7

Notes:
[1/] OCA 10-7 Attachment 1

National Fuel Gas Distribution Corporation

Calculation of Forfieted Discount Percentage
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.		Description	Twelve Months Ended 9/30/2023	Twelve Months Ended 9/30/2024	Twelve Months Ended 9/30/2025
		Gas Service Revenue:			
1	480.0	Residential Sales	$ 200,708	$ 140,127	$ 163,839
2	481.1	Commercial Sales	31,557	20,092	25,583
3	481.2	Industrial Sales	2,745	1,460	2,054
4	481.3	Public Authority Sales	2,302	1,270	1,640
	489.3	Transportation -Dist. Facilities	36,160	41,530	45,231
5			$ 273,471	$ 204,478	$ 238,348
6					
7	487.0	Forfeited Discounts	1,373	1,077	1,146
8					
9		Forfeited Discounts Ratio	0.502%	0.527%	0.481%
10					
11		3-Year Average			0.503%
12					
13		Calculated Increase in Revenues			$ 4,205
14					
15		Increase in Forfieted Discount relate to Revenue Increase			$ 21

Notes:
1/ OCA 10-20

R-2025-3059428
Exhibit LKM -7B-SR

National Fuel Gas Distribution Corporation

Adjustment to Rent From Gas Property
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	Twelve Months Ended 9/30/2023	$ 89
2	Twelve Months Ended 9/30/2024	92
3	Twelve Months Ended 9/30/2025	100
4	Average Growth Factor	1.0603
5	HTY Rent From Gas Property	$ 100
6	FTY Rent From Gas Property	$ 106
7	Average Growth Factor	1.0603
8	FPFTY Rent From Gas Property per OCA	$ 112
9	FPFTY Rent From Gas Property per NFG	100
10	Adjustment to Other Operating Revenue	$ 12

Notes:
[1/] OCA 10-20

R-2025-3059428
Exhibit LKM -8B-SR

National Fuel Gas Distribution Corporation

Adjustment to Stock Based Compensation
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	FPFTY Stock Based Compensation Rate Year Oct. 2027	$ 1,430 [1/]
2	Adjustment to Operating Expenses	$ (1,430)

Notes:
[1/] Exhibit MPW-1, Schedule 2, Page 14.

R-2025-3059428
Exhibit LKM -9B-SR

National Fuel Gas Distribution Corporation

Adjustment to Amortize Insurance Settlement Proceeds
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	NFG Office Employee Expense Inflation Adjustment	$ 798
2	Amortization Period	3
3	Adjustment to Operating Expenses	$ (266)

Notes:
[1/] Information Submitted Pursuant to Section 53.51 et seq of the Commission's Regulations, III-F.8, Page 2.

R-2025-3059428
Exhibit LKM -10B-SR

National Fuel Gas Distribution Corporation

Adjustment to Office Employee Inflation Adjustment
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	NFG Office Employee Expense Inflation Adjustment	$ 64
2	Adjustment to Operating Expenses	$ (64)

Notes:
[1/] OCA 10-20

R-2025-3059428
Exhibit LKM -11B-SR

National Fuel Gas Distribution Corporation

Adjustment to Other Expense -Line Hit Collections
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	NFG Line Hit Collection Adjustment	$ 156
2	Adjustment to Operating Expenses	$ (156)

Notes:
[1/] ATF-2, Schedule 4.

R-2025-3059428
Exhibit LKM -12B-SR

National Fuel Gas Distribution Corporation

Adjustment to Remove Charge Off Of Customer A/R
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount [1/]
1	Charge Off Of Customer A/R	$ -
2	Adjustment to Operating Expenses	$ -

Notes:
[1/] I&E-RE-D-25.

R-2025-3059428
Exhibit LKM -13B-SR

National Fuel Gas Distribution Corporation

Adjustment to Uncollectible Expense
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount	
1	Revenue at Presaent Rates	$ 264,263	1/
2	Uncollectible Factor	1.53%	2/
3	Uncollectible Expense per OCA Before CAP Forgiveness	$ 4,043	
4	Uncollectible Expense per NFG Before CAP Forgiveness	4,116	3/
5	Adjustment to Operating Expenses	$ (73)	

Notes:

1/ Exhibit LKM-1, Column (3), Lines 2+3.

2/ National Fuel Exhibit ATF-3, Schedule 1 (excludes Management Adj.)

3/ National Fuel Exhibit ATF-3, Schedule 1, line 9.

R-2025-3059428
Exhibit LKM -14B-SR

National Fuel Gas Distribution Corporation

Adjustment to Postage Expense
For the Fully Projected Future Test Year Ended July 31, 2024
($ in Thousands)

Line No.	Description	Amount	
1	HTY Normalized Postage Expense	$ 1,225	1/
2	Planned Postage Rate Increase	104.8%	
3	Pro Forma Posatge Expense	$ 1,284	
4	FPFTY Adjusted Postage Expense	1,459	1/
5	Adjustment to Operating Expenses	$ (175)	

Notes:
1/ National Fuel Exhibit ATF-1.

R-2025-3059428
Exhibit LKM -15B-SR

National Fuel Gas Distribution Corporation

Adjustment to Remove Economic Development
Dues and Memberships
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	Economic Development Dues and Memberships	$ 17 [1/]
2	Adjustment to Operating Expenses	$ (17)

Notes:
[1/] OCA 10-34.

National Fuel Gas Distribution Corporation

Adjustment to Include Customer Payment Transaction Costs
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	Customer Payment Transaction Costs	$ 930 [1/]
2	Adjustment to Operating Expenses	$ 930

Notes:
[1/] OCA Set 7-4 attachment.

National Fuel Gas Distribution Corporation

Adjustment to Reflect OCA Recommended Depreciation Rates
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount
1	OCA Adjustment to Depreciation Expense	$ 4,670 [1/]
2	Adjustment to Operating Expenses	$ (4,670)
3	Adjustment to Accumulated Depreciation	$ 4,670

Notes:
[1/] OCA Set 7-4 attachment.

R-2025-3059428
Exhibit LKM -18B-SR

National Fuel Gas Distribution Corporation

Interest Synchronization Adjustment
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Amount	
1	Adjusted Rate Base	$ 575,805	1/
2	Weighted Cost of Debt	2.430%	
3	Adjusted Interest Deduction	$ 13,992	
4	Interest Deduction Per Company	13,889	2/
5	Adjustment to Synchronize Interest Expense	$ 103	
6	Effective State Income Tax Rate	7.49%	
7	Adjustment to State Income Taxes	$ (8)	
8	Federal Income Tax Base	$ 95	
9	Federal Income Tax Rate	21.00%	
10	Adjustment to Federal Income Taxes	$ (20)	

Notes:
1/ Exhibit LKM-2, Page 1.
2/ Company Schedule D-11, FPFTY.

R-2025-3059428
Exhibit LKM -19B-SR

National Fuel Gas Distribution Corporation

Calculation of Rate of Return at OCA Recommended
ROE and Capital Structure
For the Fully Projected Future Test Period Ended October 31, 2027
($ in Thousands)

Line No.	Description	Capitalization Ratio	Cost Rate	Weighted Cost
1	Long-Term Debt	43.60%	5.58%	2.43%
2	Short-Term Debt	0.00%	0.00%	0.00%
3	Total Debt	43.60%		2.43%
4				
5	Common Equity	56.40%	9.06%	5.11%
6				
7	Total	100.00%		7.54%

Source:
Per OCA Witness Reno

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission

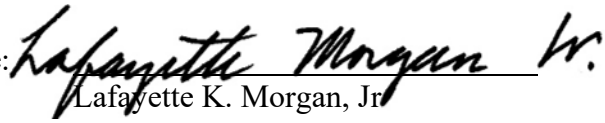
v. Docket No. R-2025-3059428

National Fuel Gas Distribution Corp.
:

VERIFICATION

I, Lafayette K. Morgan, Jr., hereby state that the facts above set forth in my Surrebuttal Testimony, OCA Statement 2SR, are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

DATED: May 27, 2026

Signature: 
Lafayette K. Morgan, Jr.

Address: Exeter Associates, Inc.
10480 Little Patuxent Parkway
Suite 300
Columbia, MD 21044-3575

OCA Statement No. 3

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	)	
v.	)	**DOCKET NO. R-2025-3059428**
National Fuel Gas Distribution Corporation	)	

DIRECT TESTIMONY OF

MAUREEN L. RENO

ON BEHALF OF THE

COMMONWEALTH OF PENNSYLVANIA

OFFICE OF CONSUMER ADVOCATE

Dated: April 16, 2026

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DOCKET NO. R-2025-3059428
NATIONAL FUEL GAS DISTRIBUTION CORPORATION - RATE CASE
DIRECT TESTIMONY OF
MAUREEN L. RENO

EXHIBITS

- Exhibit MLR-1: Schedule MLR-1 – Historical Economic Trends (Percent Change from Previous Period)
- Exhibit MLR-1: Schedule MLR-2a – Interest Rates & Bond Yields (2019 to 2025)
- Exhibit MLR-1: Schedule MLR-2b – Daily Yields on Treasury Securities
- Exhibit MLR-1: Schedule MLR-2c – Daily Average TIPS Spread
- Exhibit MLR-1: Schedule MLR-3 – Survey of Professional Forecasters (U.S. Quarterly and Annual Forecasts)
- Exhibit MLR-1: Schedule MLR-4– Sample Characteristics
- Exhibit MLR-1: Schedule MLR-5a – Constant-Growth DCF Results EPS Growth Method (30-Day Stock Price)
- Exhibit MLR-1: Schedule MLR-5b – Constant-Growth DCF Results EPS, DPS, and BVPS Growth Method (30-Day Stock Price)
- Exhibit MLR-1: Schedule MLR-5c – Constant-Growth DCF Results with EPS Growth Method (90-Day Stock Price)
- Exhibit MLR-1: Schedule MLR-5d – Constant-Growth DCF Results with EPS, DPS, and BVPS Growth Method (90-Day Stock Price)
- Exhibit MLR-1: Schedule MLR-6a – Sustainable Growth DCF (Internal Growth Component)
- Exhibit MLR-1: Schedule MLR-6b – Sustainable Growth DCF (External Growth Component)
- Exhibit MLR-1: Schedule MLR-6c – Sustainable Growth DCF (Results) (30-Day Stock Price)
- Exhibit MLR-1: Schedule MLR-6d – Sustainable Growth DCF (Internal Growth Component)
- Exhibit MLR-1: Schedule MLR-6e – Sustainable Growth DCF (External Growth Component)

- Exhibit MLR-1: Schedule MLR-6f – Sustainable Growth DCF (Results) (90-Day Stock Price)
- Exhibit MLR-1: Schedule MLR-7a – CAPM Assumptions (Historical Large Stock Return, 30-yr T-Bond)
- Exhibit MLR-1: Schedule MLR-7b – CAPM Results (Historical Large Stock Return, 30-yr T-Bond)
- Exhibit MLR-1: Schedule MLR-7c – CAPM Assumptions (Supply-Side ERP, 30-yr T-Bond)
- Exhibit MLR-1: Schedule MLR-7d – CAPM Results (Supply-Side ERP, 30-yr T-Bond)
- Exhibit MLR-1: Schedule MLR-7e – CAPM Assumptions (D&P Normalized RF Rate)
- Exhibit MLR-1: Schedule MLR-7f – CAPM Results (D&P Normalized RF Rate)
- Exhibit MLR-2 (NFGD Response to OCA Interrogatory OCA VIII-4).
- Exhibit MLR-3 (NFGD Response to OCA Interrogatory OCA VIII-10).
- Exhibit MLR-4 (NFGD Response to OCA Interrogatory OCA VIII-5).
- Exhibit MLR-5 (NFGD Response to OCA Interrogatory OCA VIII-13).

DOCKET NO. R-2025-3059428
NATIONAL FUEL GAS DISTRIBUTION CORPORATION - RATE CASE
DIRECT TESTIMONY OF
MAUREEN L. RENO

I. INTRODUCTION AND QUALIFICATIONS

Q. PLEASE STATE YOUR FULL NAME, OCCUPATION, AND BUSINESS ADDRESS.

A. My name is Maureen L. Reno. I am an economist with a specialization in public utility economics and finance. I am the founder and principal consultant of Reno Energy Consulting Services, L.L.C. My business address is 19 Hope Hill Road, Derry, New Hampshire 03038.

Q. PLEASE SUMMARIZE YOUR EDUCATION.

A. I received a Bachelor of Arts degree in Economics from the University of Maine at Orono, Maine in 1996. In 1998, I earned a Master of Arts degree in Economics from the University of New Hampshire in Durham, New Hampshire, where I also completed all course work and examination requirements for a Ph.D. degree in Economics, except for my dissertation. My areas of academic concentration included industrial organization and environmental economics.

Q. WHAT IS YOUR PROFESSIONAL BACKGROUND?

A. I have 25 years of professional experience in the regulated utilities and energy sectors. From 2001 to 2011, I served as a utility analyst and program manager with the New Hampshire Public Utilities Commission, advising the Commissioners on regulated utilities' cost of capital and return on equity ("ROE"), among other regulatory matters. From 2011 to 2012, I served as a Senior Energy Economist with the Union of Concerned Scientists, advising on the intricacies of the regulated utility industry and helping to develop alternative financing programs for renewable energy investments. Since 2012, I have served as an independent consultant to multiple firms, including Exeter Associates, Inc. and TAHOEconomics, LLC on utility cost of capital, ROE, and

capital structure; Stephenson Strategic Communications, LLC on federal climate and energy policy; and TrueLight Energy, LLC on regulated utility rate impacts and energy markets.

Q. HAVE YOU PREVIOUSLY TESTIFIED AS AN EXPERT WITNESS BEFORE A PUBLIC UTILITY COMMISSION?

A. Yes. My testimony was presented and accepted in 53 regulated utility proceedings in several states, including Alaska, Arizona, California, Delaware, Georgia, Hawaii, Kansas, Missouri, New Hampshire, New Mexico, North Carolina, North Dakota, Oklahoma, Pennsylvania, Rhode Island, South Carolina and Texas, on a wide range of issues concerning regulated utilities, retail and wholesale energy markets, and renewable energy. (See Appendix A for my curriculum vitae and qualifications).

Q. ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?

A. I am serving as an expert witness on cost of capital, ROE, and capital structure on behalf of the Pennsylvania Office of Consumer Advocate ("OCA").

Q. HOW IS YOUR TESTIMONY ORGANIZED?

A. My testimony is organized into ten sections including this one. In Section II, I discuss the purpose of my testimony, which is to compare the rate of return ("ROR") proposed by National Fuel Gas Distribution Corporation ("NFGD" or "the Company") with the ROR that I am recommending. In Section III, I review current and near-term economic and financial conditions in the United States and Pennsylvania. In Section IV, I evaluate NFGD's proposed capital structure and discuss my recommended capital structure. In Section V, I summarize NFGD's proposed cost of debt. In Section VI, I discuss different types of risks for regulated gas utilities and evaluate whether NFGD is facing greater or lesser risks than its peers in the proxy group that I use in my ROE analysis.

In Section VII, I present my ROE analysis which includes the methodologies that I applied to develop my ROE recommendation. I also evaluate NFGD's proposed ROE. In Section VIII, I offer a critique of NFGD's witness, Joshua C. Nowak's, proposal related to ROE Adders. In Section IX, I present illustrative ROE values for different equity ratios based on results using the Hamada model. Finally, in Section X, I summarize my recommendations concerning a fair and reasonable ROR, which includes my recommended capital structure and ROE.

II. PURPOSE AND SUMMARY OF RECOMMENDATIONS

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS PROCEEDING?

A. The purpose of my direct testimony is to recommend an ROR for ratemaking purposes.[1] In my direct testimony, I recommend a different ROR—to include a different ROE and capital structure—rather than that proposed by NFGD. I also provide a second ROE recommendation if the Commission were to grant the Company's proposed capital structure. My ROE recommendations were determined in accordance with the standards identified in *Bluefield Water Works v. Public Service Commission*, 262 U.S. 679, 692-93 (1923) ("*Bluefield*") and *Federal Power Commission v. Hope Natural Gas Co.*, 320 U.S. 591, 605 (1944) ("*Hope*"). In *Bluefield* and *Hope*, the U.S. Supreme Court established the principle that a public utility may be allowed to earn a return comparable to a return on investments in other enterprises having similar risks that allow the utility, under efficient management, to maintain financial integrity so that it can attract capital on reasonable terms and maintain its credit.

[1] For the purpose of my testimony, I will utilize the term "rate of return," or ROR, which I consider to be synonymous with the terms "return on rate base" or "weighted average cost of capital."

Q. PLEASE DESCRIBE NFGD AND ITS OPERATIONS.

A. NFGDC provides natural gas distribution service to approximately 756,000 customers, with 213,000 customers in Pennsylvania and 543,000 customers in New York.[2]

Q. WHAT IS THE RATE OF RETURN THAT NFGD IS PROPOSING?

A. For the fully projected future test period ending October 31, 2027 ("FPFTY"), NFGD proposed a ROR of 8.78%, which is composed of (1) a capital structure of 56.4% common equity, and 43.6% long-term debt; (2) a cost of long-term debt of 5.58%;; and (3) an ROE of 11.25%.[3] See Table 1 at the end of this section of my testimony for a comparison of the proposed and recommended RORs.

Q. SHOULD THE COMMISSION ACCEPT NFGD'S PROPOSED RATE OF RETURN?

A. No. The Commission should reject NFGD's proposed ROR because of two main reasons. First, it is based on an overstated ROE that does not accurately reflect investors' current expected returns on utility stocks. Second, NFGD's proposed natural gas system ROR of 8.78% is excessively high and inconsistent with the RORs typically allowed for distribution natural gas utilities in the recent past.

Q. SHOULD THE COMMISSION ACCEPT NFGD'S PROPOSED CAPITAL STRUCTURE?

A. No, NFGD's proposed equity ratio of 56.4%, based on the FPFTY ending October 31, 2027, is unreasonable for establishing the Company's capital structure for ratemaking purposes in the current proceeding. NFGD's proposed equity ratio of 56.4% is inconsistent with regulated utility sector trends and exceeds recently observed average

[2] NFGD St. 10 at 24.
[3] NFGD Ex. A:B-6-7; NFGD St. 10 at 55.

capital structures allowed by commissions across the U.S. I also have significant concerns regarding the reasonableness of NFGD's ROR, and a higher equity ratio further amplifies these concerns.

Q. SHOULD THE COMMISSION ACCEPT NFGD'S PROPOSED COST OF LONG-TERM DEBT?

A. Yes. NFGD's long-term debt costs appear to be based on the Company's embedded cost of long-term debt, individual outstanding debt costs are in line with market rates during the time of each debt issuance.

Q. SHOULD THE COMMISSION ACCEPT NFGD'S PROPOSED ROE?

A. No. The 11.25% ROE proposed by NFGD witness Joshua C. Nowak does not comport with current market trends and the return on equity investors expect for a stock from a similar-risk gas utility.

Mr. Nowak skews his analysis by over-relying on inputs with an upward bias. For instance, he relies almost exclusively on earning growth estimates, which has the effect of inflating his Discounted Cash Flow ("DCF") and Capital Asset Pricing Model ("CAPM") results. By contrast, I rely on a combination of earnings growth estimates as well as dividend growth, book value growth, and sustainable growth in order to produce more accurate results. Mr. Nowak also inflates his ROE recommendation through the use of an unsupported 25 basis-point Management Efficiency Adder.

Q. HAS THE COMMISSION RECENTLY EXPRESSED CONCERN REGARDING THE COMPANY'S REQUESTED ROR, ROE, AND CAPITAL STRUCTURES?

A. Yes. Vice Chair Kimberly Barrow recently issued a statement during the February 19, 2026 Public Meeting expressing concern regarding NFGDC's prosed ROR, ROE, and

capital structure, stating the following, "I urge the parties to take a critical look at the Company's requested rate of return and return on equity (ROE) as well as capital structure (common equity ratio and debt capital) to ensure reasonableness. Deviations in each of these items translate into millions of dollars charged to customers of all rate classes."[4]

Q. WHAT DO YOU RECOMMEND AS THE APPROPRIATE ROR FOR NFGD?

A. For NFGD, I recommend an overall ROR of 7.66%, which is composed of (1) a capital structure of 50.0% equity and 50.0% long-term debt, (different from the Company's claim); (2) a cost of long-term debt of 5.58% (no difference from the Company's claim); and (3) an ROE of 9.74% (again, different from the Company's claim). See Table 1A below for a comparison of the proposed and recommended RORs. Table 1B presents my alternative ROE and ROR values calculated under the assumption that the Commission approves the Company's proposed capital structure of 43.60/56.40% debt/equity.

Q. WHY SHOULD THE COMMISSION ACCEPT YOUR RECOMMENDED 9.74% ROE?

A. My ROE recommendation of 9.74% is based on the midpoint of my DCF results and falls within my ROE range of 8.88% to 10.61%. I recommend a ROE based on the midpoint of my DCF range because it represents a fair and reasonable ROE for NFGD in consideration of its risks and investors' current valuation of public utilities and equity assets in general. I discuss my modeling in greater detail further in my direct testimony.

Q. DID YOU EMPLOY ANY OTHER MODELS WHEN ESTIMATING YOUR ROE RESULTS?

[4] *Statement of Vice Chair Kimberly Barrow Re: Pa. PUC v. National Fuel Gas Distribution Corporation*, Docket No. R-2025-3059428, Public Meeting (Feb. 19, 2026).

A. Yes. I also use the CAPM as a check on the reasonableness of my DCF results; however, my recommended ROE is not based on my CAPM results. I use the CAPM to estimate a range of ROE results of 7.43% to 10.55%, with a midpoint of 8.99%. This midpoint of CAPM result is 75 basis points lower than my DCF midpoint. As noted, these CAPM results serve as a check on my DCF results to show that my recommendation based on the DCF model is reasonable and should be accepted by the Commission.

Q. HAVE YOU PREPARED A TABLE THAT COMPARES NFGD'S REQUESTED ROR TO THE ROR THAT YOU RECOMMEND?

A. Yes. See Table 1A below.

TABLE 1A. COMPARISON OF PROPOSED & RECOMMENDED RATES OF RETURN

	NFGD WITNESSES NOWAK			OCA WITNESS RENO		
	Weight	**Cost of Capital**	**Weighted Cost**	**Weight**	**Cost of Capital**	**Weighted Cost**
Long-Term Debt	43.60%	5.58%	2.43%	50.00%	5.58%	2.79%
Common Equity	56.40%	11.25%	6.35%	50.00%	9.74%	4.87%
Total Capital Structure	100.00%		8.78%	100.00%		7.66%

Amounts and percentage calculations may not add up due to independent rounding.
Source: NFGD Ex. A:B-6-7. Weighted average debt cost figure does not match written testimony (NFGD St. 10 at 55) due to rounding.

Q. DO YOU PROVIDE AN ALTERNATIVE ROE AND ROR IF THE COMMISSION WERE TO GRANT THE COMPANY'S REQUESTED CAPITAL STRUCTURE?

A. Yes, if the Commission were to approve the Company's proposed capital structure of 43.60/56.40% debt/equity, my alternative ROE is 9.21% with a resulting ROR of 7.62%. This alternative ROE and resulting ROR is calculated using the Hamada formula adjustment framework to the CAPM to demonstrate how the Company's proposed capital structure justifies a lower ROE due to lower leverage risk. Please refer to Section IX of my direct testimony for further detail on the methodology and calculations.

TABLE 1B. ALTERNATIVE PROPOSED & RECOMMENDED RATES OF RETURN

ALTERNATIVE ROE/ROR

	Weight	Cost of Capital	Weighted Cost
Long-Term Debt	43.60%	5.58%	2.43%
Common Equity	56.40%	9.21%	5.19%
Total Capital Structure	100.00%		7.62%

Amounts and percentage calculations may not add up due to independent rounding.
Source: NFGD Ex. A: B-6-7. Weighted average debt cost figure does not match written testimony (NFGD St. 10 at 55).

III. MACROECONOMIC AND FINANCIAL MARKET CONDITIONS

Q. WHY IS IT IMPORTANT TO CONSIDER MACROECONOMIC CONDITIONS IN DEVELOPING A RECOMMENDED ROE, COST OF DEBT, AND ROR?

A. I present current and expected macroeconomic conditions in this section to set the context for my ROE, cost of debt, and resulting ROR recommendations to the Commission. With respect to the expected ROE, investors evaluate both economic and

monetary conditions when assessing the opportunity costs of their investments. Global, national, and regional economic conditions affect investor expectations regarding investment returns, as measured by stock prices, interest rates, and sustainable dividend growth, each of which serve as inputs I use in my DCF and CAPM analyses. Additionally, investors closely monitor market interest rates and the return on fixed income securities, in particular U.S. Treasury bonds[5] as they weigh alternative investment options when making capital allocation decisions. The cost of new debt issuances is also determined according to the expectations set by bond holders.

Q. HOW ARE INTEREST RATES ON FIXED-INCOME SECURITIES DETERMINED?

A. Interest-rates or bond yields on long-term bonds are determined by investors' expectation on economic growth and inflation over the duration of the term of a particular bond. Interest rates on short-term bonds while influenced by these expectations, are largely driven by the actions of the U.S. Federal Reserve Bank ("Federal Reserve"). Specifically, the Federal Open Markets Committee ("FOMC") determines these rates by adjusting the Federal Funds Rate (the overnight interest rate it charges commercial banks) and buying or selling U.S. Treasury securities to meet certain policy objectives.

Q. PLEASE ELABORATE ON THE FEDERAL RESERVE'S POLICY OBJECTIVES.

A. The Federal Reserve has two policy objectives: the first is to maintain full employment or the total amount of employment that the economy can experience without any overt inflationary pressures; and the second, is to maintain a target rate of inflation of 2.0%

[5] *See* Risk discussion *infra* Section VI.

over the long run.[6] Thus, the Federal Reserve monitors key economic indicators to gauge whether it is necessary to adjust the Federal Fund Rate to influence borrowing behaviors and/or adjust its balance of securities to change the level of money supply in the economy.

Q. WHAT ECONOMIC INDICATORS DO BOTH THE FEDERAL RESERVE AND INVESTORS MONITOR?

A. The Federal Reserve and investors monitor economic indicators including measures of economic growth, such as real Gross Domestic Product ("GDP'), the unemployment rate, and measures of inflation, such as the Consumer Price Index ("CPI"), among others.

Q. HOW WOULD YOU DESCRIBE THE CURRENT STATE OF THE U.S. ECONOMY?

A. In general, economic signs show a slight economic slowdown and continued decrease in inflation throughout 2025. Recent economic growth, as measured by real GDP, shows that the U.S. economy has stabilized at a lower rate after experiencing a post-COVID-19 pandemic rebound. However, economists are concerned that recent U.S. military operations in Iran and the resulting global crude oil shortage will reverse the inflation reduction trends.

[6] *Why does the Federal Reserve Aim for Inflation of 2 Percent Over the Longer Run?*, Bd. Governors Fed. Rsrv. Sys., https://www.federalreserve.gov/faqs/economy_14400.htm (last visited Apr. 7, 2026).

Q. HOW HAS ECONOMIC GROWTH CHANGED SINCE THE COVID-19 PANDEMIC?

A. In 2021, real GDP growth reached an annual high of 6.2%, falling to 2.5% in 2022 and then rebounding slightly to 2.9% in 2023 and 2.8% in 2024. During 2025, real GDP decreased to 2.2%.[7]

Q. HOW HAS UNEMPLOYMENT CHANGED SINCE THE COVID-19 PANDEMIC?

A. Unemployment decreased from 5.3% in 2021 to 3.6% in 2022 and 2023. Unemployment increased to 4.0% in 2024 and 4.3% in 2025.[8]

Q. HOW HAS INFLATION CHANGED SINCE THE COVID-19 PANDEMIC?

A. Inflation, as measured by the CPI, remains the primary concern to the economy, though it decreased substantially from its peak of 8.0% in 2022 to 2.9% in 2024 and 2.6% in 2025.[9] The most recent quarterly data shows that the CPI rose to 3.3% for the 12 months ending March 2026.[10]

Q. HOW HAS THE FEDERAL RESERVE RESPONDED TO THESE ECONOMIC TRENDS?

A. Since July 2023, the FOMC has paused its campaign of aggressively increasing the Federal Funds Rate to dampen stubborn inflationary pressures, reducing the amount of money circulating through the economy, and driving down aggregate demand. Since then, the FOMC decreased the Federal Funds Rate three consecutive times in late 2024 and further decreased it three more times in late 2025. In its March 2026 meeting, the

[7] *Economic Indicators*, Council Econ. Advisors, Feb. 2026, at 3.

[8] *Id.* at 11.

[9] *Id.* at 24.

[10] *Economic News Release: Consumer Price Index Summary*, U.S. Bureau Labor Statistics (Apr. 10, 2026), https://www.bls.gov/news.release/cpi.nr0.htm#:~:text=Transmission%20of%20material%20in%20this,%2C%20education%2C%20and%20new%20vehicles.

FOMC held the target for the Federal Funds Rate steady at the 3.50% to 3.75% range.[11] In the press release issued on March 18, 2026, the FOMC states that "[a]vailable indicators suggest that economic activity has been expanding at a solid pace. Job gains have remained low, and the unemployment rate has seen little change in recent months. Inflation remains somewhat elevated."[12] The FOMC continued by stating, "[t]he Committee seeks to achieve maximum employment and inflation at the rate of 2 percent over the longer run. Uncertainty about the economic outlook remains elevated. The implications of developments in the Middle East for the U.S. economy are uncertain. The Committee is attentive to the risks to both sides of its dual mandate."[13] The FOMC further stated, "[i]n assessing the appropriate stance of monetary policy, the Committee will continue to monitor the implications of incoming information for the economic outlook. The Committee would be prepared to adjust the stance of monetary policy as appropriate if risks emerge that could impede the attainment of the Committee's goals. The Committee's assessments will take into account a wide range of information, including readings on labor market conditions, inflation pressures and inflation expectations, and financial and international developments."[14]

Q. HOW HAVE INVESTORS RESPONDED TO THESE ECONOMIC TRENDS?

A. According to *Value Line Investment Survey* ("*Value Line*"), investors are growing concerned about this persistent inflation particularly since the latest indicators have not fully reflected international oil supply shocks caused by U.S. military operations in Iran. This disruption in the world's oil supply has led to a jump in oil prices, which will

[11] *Federal Reserve Issues FOMC Statement*, Bd. Governors Fed. Rsrv. Sys. (Mar. 18, 2026), https://www.federalreserve.gov/newsevents/pressreleases/monetary20260318a.htm.
[12] *Id.*
[13] *Id.*
[14] *Id.*

make it more expensive for businesses to operate and for consumers to heat their homes and fuel their vehicles.[15] *Value Line* also notes that recent stock market volatility has been accompanied by indexes falling by mid-single digits.[16]

Q. HOW DO INVESTOR'S EXPECTATIONS INFLUENCE YOUR ROE RESULTS?

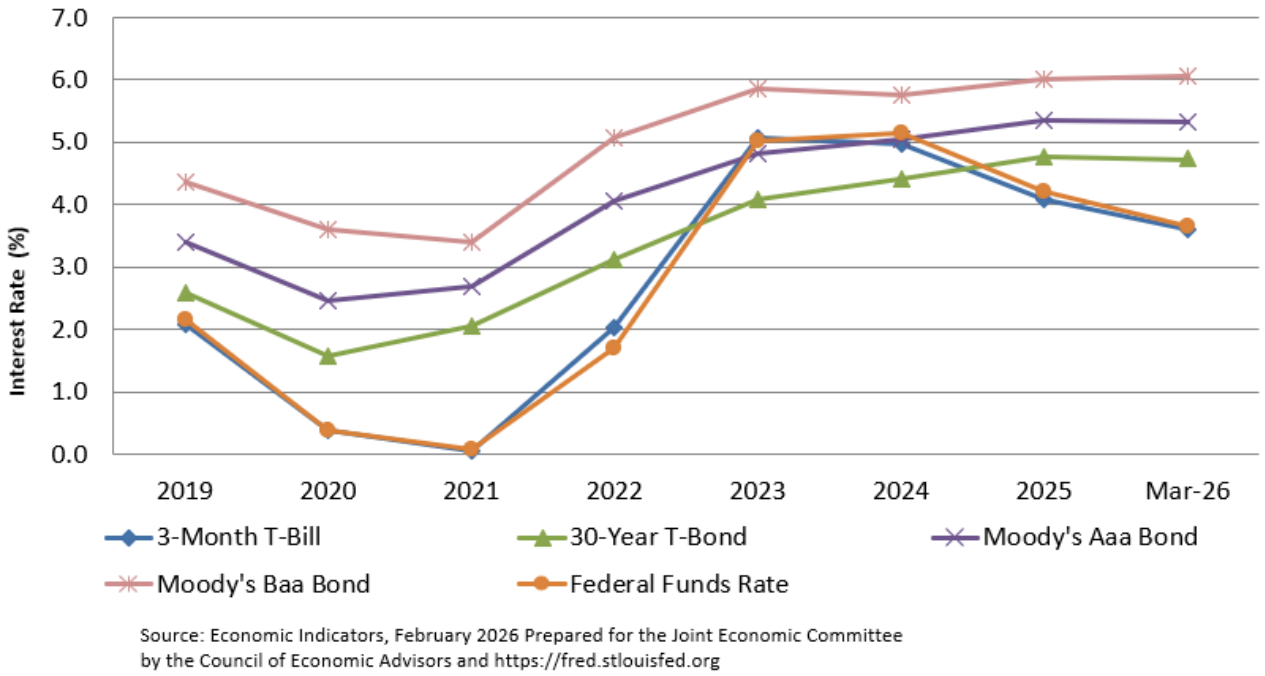
A. Investors consider action of the Federal Reserve and the economic conditions discussed above when estimating the opportunity cost of investing in a share of utility stock, or their expected return on equity in the long run. Thus, in addition to assessing economic growth, unemployment, and inflation, they will consider the yields or the return on fixed-income securities (e.g., interest rates on bonds), in particular interest rates on U.S. Treasury bonds.

Q. HOW HAVE INTEREST RATES AND INVESTOR EXPECTATIONS CHANGED IN RECENT YEARS?

A. Figure 1 below shows how the interest rates have changed from 2019 to March 2026. Yields on short-term Treasury bonds have decreased from elevated levels in 2023/2024 in response to the FOMC's recent actions. Yields on long-term Treasury bonds and corporate bonds have remained near peak levels.

[15] *Selection & Opinion*, 9 The Value Line Investment Survey 1769, 1769 (Apr. 2026).
[16] *Id.*

FIGURE 1. INTEREST RATES AND BOND YIELDS (2019-2026)



Source: Economic Indicators, February 2026 Prepared for the Joint Economic Committee by the Council of Economic Advisors and https://fred.stlouisfed.org

Schedule MLR-2a (Interest Rates and Bond Yields (2019-2026)).

Yields on long-term bonds (reference the 30-Year Treasury Bond or "T-Bond," shown in red in Figure 1 above) rose from 2.06% in 2021 to 4.78% in 2025 and have remained high as of March 2026.[17] The cost of debt for Moody's Investors Service ("Moody's") Baa-rated corporations peaked in 2023 at 5.87%, fell slightly to 5.76% in 2024, however, it rebounded to 6.00% in 2025 and 6.05% in March 2026.[18] Moreover, short-term interest rates (reference the 3-Month U.S. Treasury Bill or "T-Bill," shown

[17] *Economic Indicators*, Council Econ. Advisors, Feb. 2026, at 30.
[18] *Id.*

in blue in Figure 1 above) rebounded from 0.04% in 2021 to 4.98% in 2024 and have since decreased to 3.61% in March 2026.[19]

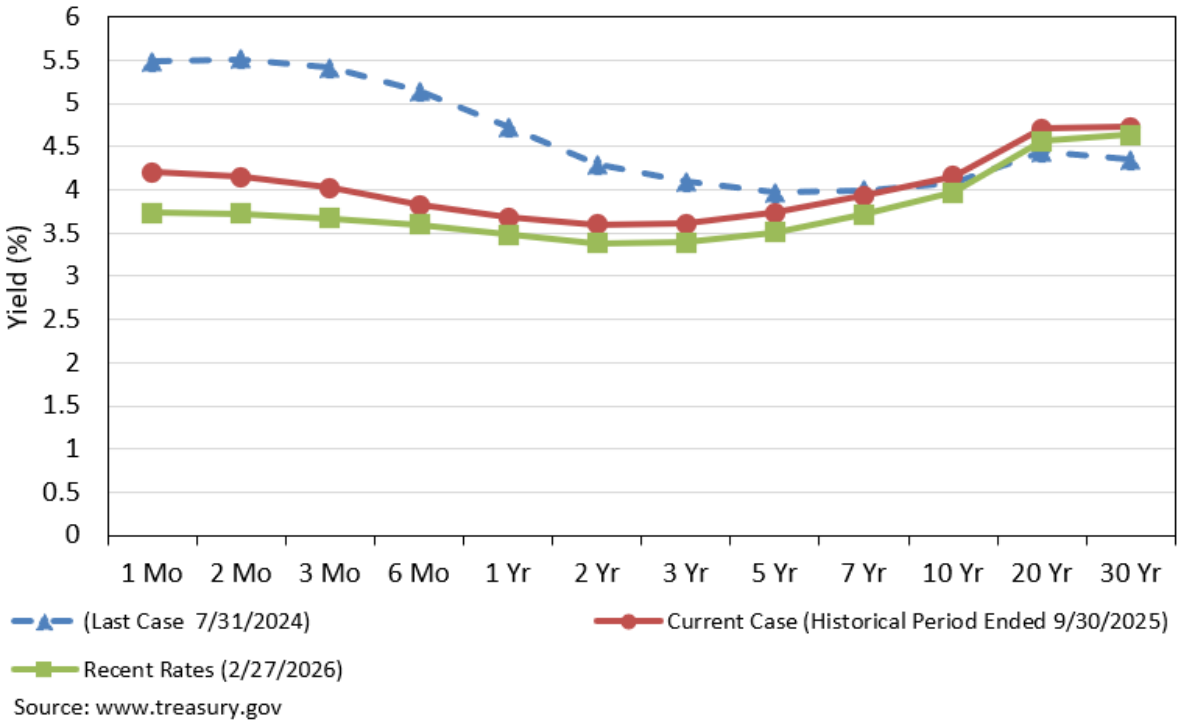
Short-term interest rates are primarily determined by the FOMC's policy actions. Recent decreases in short-term interest rates follow the FOMC's decrease in the Federal Funds Rate and reduction on its holdings of Treasury and agency mortgage-backed securities to increase money supply.[20] Long-term interest rates are primarily determined by market forces, including investor expectations of future levels of inflation and economic growth.

Figure 2 below shows the yields on the different types of T-Bills and T-Bonds, with values along the horizontal axis representing the maturity of each T-Bill or T-Bond and the vertical axis showing the corresponding yield or interest rate. Each line represents the yields associated with each type of asset on a particular date and is referred to by financial analysts as the "yield curve." The yield curve reflects the bond market's consensus opinion of future financial market conditions as investors decide which bill or bond to purchase in response to expected levels of inflation and interest rates.

[19] *Id.*

[20] *Monetary Policy Report*, Bd. Governors Fed. Rsrv. Sys. (Feb. 7, 2026), https://www.federalreserve.gov/publications/files/20250207_mprfullreport.pdf.

FIGURE 2. TREASURY SECURITY YIELD CURVE



Q. HOW HAS THE YIELD CURVE CHANGED IN RECENT YEARS?

A. It is important to recall the evolution of the yield curve in recent years to understand investors' expectations of economic growth and inflation since the Company's last rate case. During NFGD's last rate case which incorporated a future test period ended July 31, 2024, the yield curve was downward-sloping with yields ranging from 5.49% for 1-month T-Bills to 4.35% for 30-year T-Bonds. The yields on short-term T-Bills were at 5.49% in response to FOMC actions, while the yields on some long-term T-Bonds were lower, creating a downward sloping yield curve. Investors were expecting both a sustained economic slowdown and for the FOMC to shift its monetary policy to start decreasing interest rates to mitigate the slowdown.

The shape of the yield curve has since flipped in 2025 and most recently in February 2026. As shown in Figure 2 above, yields on long-term T-Bonds are higher than the yields on short-term T-Bills as of February 27, 2026. This shows that yields on longer-term bonds are still near high levels while yields on short-term T-Bills have decreased in light of easing interest rates by the FOMC, which suggests that investors may not be expecting an economic slowdown.

Q. WHAT OTHER MEASURES OF INVESTORS' EXPECTATIONS DO YOU CONSIDER?

A. Another metric by which to gauge investor expectations regarding long-term inflation is the Treasury Inflation-Protected Securities ("TIPS") spread, or the difference between yields on long-term nominal Treasury securities and long-term TIPS. The yield on a long-term conventional Treasury bond pays its holder a fixed nominal coupon and principal to compensate the investor for future inflation, and it includes the real rate of interest and inflation compensation. For TIPS, the coupons and principal both rise and fall with inflation, as measured by the CPI. The published yield includes only the real rate of interest. Therefore, the difference, roughly speaking, between the prevailing yields on these two types of Treasury securities reflects the inflation compensation over that maturity horizon that is expected by bond investors.

The 30-day average difference in the yield on the 30-year T-Bond and 30-year TIPS for the period ended February 27, 2026, equals 2.24% and represents the market's most recent expectations of long-term inflation. In other words, this data confirms that investors are anticipating that the rate of inflation over the long term is expected to stabilize at a higher rate than the FOMC's goal of 2.0%, which may further feed fears that the FOMC may delay any further interest rate cuts.

Q. WHAT ARE THE EXPECTATIONS FOR THE U.S. ECONOMY IN THE NEAR FUTURE?

A. As the FOMC continues to pause reducing short-term interest rates in response to persistent inflation, forecasters have noted the projections in near-term economic growth are higher than previously forecasted figures. However, the economy is still expected to slow down in the near term and then hover around 2.0% in the longer term. Specifically, according to the First Quarter ("Q1") 2026 edition of *Survey of Professional Forecasters* published by the Federal Reserve Bank of Philadelphia, economic growth, as measured by real GDP, is expected to decrease from 2.5% during 2026 to 2.1% during 2027 and 2028.[21] Long-run economic growth beyond 2027 is expected to decrease further to 1.9% in 2029.[22]

Over the next year, inflation is expected to decrease but remain near moderate levels, with the CPI remaining near 2.6% in 2026 and then falling to 2.5% in 2027 and 2.4% in 2028.[23] Another inflation metric closely watched by the FOMC is the Personal Consumption Expenditures ("PCE") index because it represents a broader measure of inflation. The PCE is expected to decrease from 2.7% in 2026 to 2.3% in 2027 and 2.2% in 2028, which is slightly greater than the FOMC's monetary policy goal of 2% inflation.[24] The data also show that analysts expect the national unemployment rate to decrease slightly from 4.5% in 2026 to 4.4% in 2027, 2028, and 2029.[25]

[21] *Survey of Professional Forecasters: First Quarter 2026*, Fed. Rsrv. Bank Philadelphia, Mar. 6, 2026, at 9, 11.
[22] *Id.*
[23] *Id.*
[24] *Id.*
[25] *Id*.

Q. HOW WILL U.S. MILITARY OPERATIONS IN IRAN AFFECT THESE FORECASTS?

A. Since this report by the Federal Reserve Bank of Philadelphia was released in the beginning of March 2026, the forecasts therein do not reflect the economic and financial impacts of the sudden decrease in global crude oil supplies. I expect that the next quarterly report will show higher inflation and possible higher unemployment and lower economic growth as businesses and consumers adjust to increasing fuel costs.

Q. HOW DO INVESTORS VIEW UTILITY STOCKS?

A. In general, investors view utility stocks as a safe investment because of the utility industry's defensive fundamentals and high dividend yields. Natural Gas stocks are considered defensive by investors because gas service is essential, and utilities are regulated monopolies. Thus, during times of uncertainty investors seek low risk stocks, such as Natural Gas stocks. *Value Line* reports that the big draw of utility equities is their dividends, which tend to be adequately covered by corporate earnings.[26] As of February 20, 2026, *Value Line* reports that the average yield for the Natural Gas group was approximately 3.3%, compared to the Value Line median of 2.0%.[27] According to *Value Line*, long-term prospects are optimistic due to the abundance of domestic natural gas supply and the fact that about half of all domestic households use natural gas, with few alternatives available.[28] Total returns on utility stocks are dependent on investors' expectations of where interest rates will go next and prospects for the economy in general since investors choose these stocks (with low betas) over economically sensitive higher-risk stocks during economic uncertainty.

[26] *Natural Gas Utility*, Value Line Investment Survey, Feb. 20, 2026, at 534.
[27] *Id.*
[28] *Id.*

Q. HOW DO INVESTORS' EXPECTATIONS RELATE TO NFGD'S ROE?

A. As discussed previously in this testimony, despite a slight reprieve in inflation last year, inflation may increase again due to crude oil supply shocks caused by U.S. military operations in Iran. In response, the Federal Reserve may continue to delay reducing interest rates or even increase rates. Given this uncertainty, investors may choose more defensive stocks, such as utility stocks, that typically have a lower expected return compared to higher-risk stocks. This trend is demonstrated by my cost of equity study estimates.

IV. CAPITAL STRUCTURE

Q. WHAT IS MEANT BY THE TERM "CAPITAL STRUCTURE"?

A. Capital structure refers to the relative percentage of equity, preferred stock, and debt that a company uses to finance its investments.

Equity (or common equity) represents ownership in a company and its investments. It includes common stock, retained earnings, and additional paid-in capital. Equity financing is more expensive than debt financing for two reasons: (1) because companies have a legal obligation to pay debt before equity, stockholders expect a higher return to compensate for this risk and (2) returns on equity (or dividends) are not tax deductible as a business expense like a company's interest payments on debt.

Preferred stock is a type of stock that offers greater benefits than common equity. Preferred stockholders receive a fixed dividend and have priority for payment over common stockholders.

Debt represents liabilities on a company's books that must be repaid prior to any common or preferred stockholders receiving a return on their investment. Corporate debt generally includes two time horizons: (1) long-term debt that matures over a period of more than one year; and (2) short-term debt that matures within one year.

Q. HOW IS A UTILITY'S TOTAL RATE OF RETURN CALCULATED?

A. The total rate of return is composed of the weighted costs of long-term debt and equity capital. Long-term debt costs are typically computed using the utility's actual debt costs as of a certain date (e.g., the last day of the test year). In some jurisdictions, such as Pennsylvania, short-term debt is sometimes included in the capital structure for ratemaking purposes. Unlike the debt components of the capital structure, equity cost rates must be estimated.

The utility's total ROR is developed by multiplying the percentage of each type of financing (common equity, long-term debt, and short-term debt) by their specific cost rates and then totaling the results for a total after-tax ROR. This rate is then converted to pre-tax returns by grossing up the common equity and the preferred stock dividends for taxes. The final pre-tax return is then multiplied by the utility's rate base to determine the amount of money that customers must pay to the utility for the Company to have an opportunity to earn its return on investment and associated tax payments.

Q. HOW DOES THE CAPITAL STRUCTURE IMPACT THE TOTAL RATE OF RETURN?

A. The cost of equity is generally higher than the cost of debt, so ratepayers bear higher costs when the utility finances more of its rate base investment using common equity

and preferred stock. As explained above, stockholders expect a higher return because companies are contractually obligated to repay their debt, however, no such obligation exists for equity. Additionally, equity is also more expensive than debt because debt financing is tax deductible while stock dividend payments are not. Thus, if a utility is allowed to use a capital structure for ratemaking purposes that has more equity than debt, ratepayers also pay a higher tax burden.

Q. HOW DO INVESTORS VIEW THE CAPITAL STRUCTURE?

A. On the one hand, investors may view a high reliance on debt as risky (referred to as financial or leverage risk) because debt has priority of payment over equity. Given that creditors must be paid before investors, a company's relatively high debt burden can lead to a higher required ROE relative to similar investment opportunities to accommodate the higher risk. On the other hand, excessive equity, while reducing financial risk for an enterprise's creditors and investors, increases the overall cost of capital (and therefore return on rate base), which must be recovered through customers rates. This raises investor concern over affordability of utility rates in the context of macroeconomic inflation conditions.

Q. WHAT CAPITAL STRUCTURE IS NFGD REQUESTING FOR USE IN THIS CASE?

A. For the FPFTY ending October 31, 2027, NFGD is proposing a capital structure of 56.4% common equity and 43.6% long-term debt.[29] NFGD issued a $175 million promissory note in February 2025 and has $125 million remaining through December 31, 2026. This capital structure also includes new financed long-term debt that NFGD plans to receive of $125 million and $275 million from its parent, National Fuel Gas

[29] NFGD St. 10 at 56.

Company ("NFG" or the "Parent"), as part of an issuance by NFG of $500 million 10-year notes in October 2026.[30]

Q. WHAT IS NFGD'S CURRENT CAPITAL STRUCTURE?

A. NFGD's actual capitalization for the historical period ended September 30, 2025, is 43.9% long-term debt and 56.1% equity.[31]

Q. HOW HAS NFGD'S CAPITAL STRUCTURE CHANGED SINCE THE LAST RATE CASE?

A. NFGD response to Interrogatory OCA-VIII-10 shows that the Company's equity ratio (excluding short-term debt balances) has decreased since the last rate case, with equity ratios of 64.02% in Sept 2022, 58.61% in September 2023, 59.10% in September 2024, and 56.15% in September 2025.[32]

Q. SHOULD THE COMMISSION ACCEPT NFGD'S PROPOSED CAPITAL STRUCTURE?

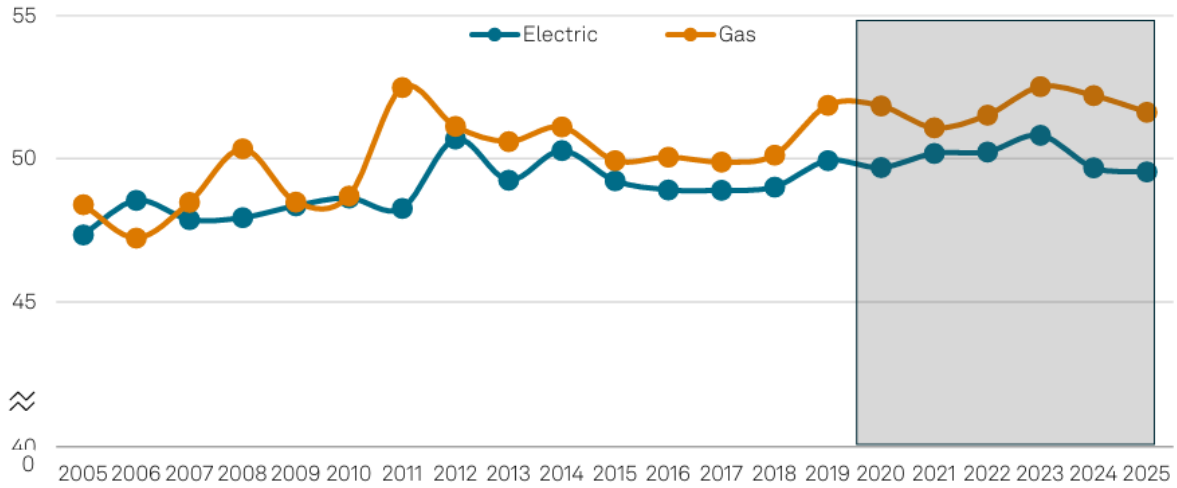
A. No.

Q. WHY SHOULD THE COMMISSION REJECT NFGD'S PROPOSED CAPITAL STRUCTURE.

[30] NFGD St. 11 at 9-10.
[31] Exhibit MLR-2 (Company Response to Interrogatory OCA VIII-4).
[32] Exhibit MLR-3 (Company Response to Interrogatory OCA VIII-10).

A. NFGD's proposed equity ratio of 56.4% exceeds annual average equity ratios approved by regulatory commissions for regulated gas utilities. For example, the average equity ratio approved by regulatory commissions for regulated gas utilities was 52.45% in 2023, 52.52% in 2024, and 51.63% in 2025.[33] Furthermore, NFGD's proposed equity ratio of 56.40% exceeds the proxy group average of 48.00% and median of 45.00% that is expected for 2026.[34]

FIGURE 3. AVERAGE AUTHORIZED EQUITY RATIO



Data compiled March 20, 2026.
The data prior to 2020 is subject to revision. The data for 2020 and beyond reflect the enhanced dataset.
Sources: Regulatory Research Associates, a group within S&P Global Energy; US Treasury Department.
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RRA Regulatory Focus - Major Energy Rate Case Decisions in the US January – December 2025, S&P Global Market Intelligence, Apr. 2026, at 7.

Additionally, NFGD's proposed equity ratio of 56.4% far exceeds the 53.9% equity ratio of its parent company, NFG, in its Historic Test Year.[35] The Commission needs to be aware that the Parent, NFG, would benefit from double leveraging, in which

[33] *RRA Regulatory Focus - Major Energy Rate Case Decisions in the US January – December 2025*, S&P Global Market Intelligence, Apr. 2026, at 7-8.
[34] OCA Ex. MLR-1: Schedule MLR-4 (Sample Characteristics).
[35] OCA Ex. MLR-4 (Company Response to Interrogatory OCA VIII-5).

a parent company issues debt and then infuses that debt into the regulated subsidiary as common equity.

Q. PLEASE EXPLAIN THE CONCEPT OF DOUBLE LEVERAGE.

A. Double leverage occurs when a utility parent company issues debt and then infuses that debt into the regulated subsidiary as common equity. NFG as the holding company wholly owns the regulated utility subsidiary, NFGD, and itself does not offer utility services. The purpose of the parent company issuing debt and infusing it into the utility subsidiary is to reduce costs to the parent company at the expense of the subsidiary's ratepayers because equity is more expensive than debt. Also, equity is grossed up for taxes, such that the costs that NFG can collect from NFGD, as the subsidiary, are far greater than the cost of issuing the debt.

Q. DID YOU ESTIMATE THE IMPACT THAT YOUR CAPITAL STRUCTURE RECOMMENDATION COULD HAVE ON THE COMPANY'S INDICATED COST OF CAPITAL?

A. Yes. I estimate the impact of my recommended capital structure on the Company's cost of capital estimate by using the Hamada model. Since the DCF does not directly incorporate the impact of the capital structure on ROE, I use the Hamada version of the CAPM. Later in this testimony I provide this analysis after I introduce and explain the CAPM.

Q. PLEASE SUMMARIZE THE RESULTS OF THE HAMADA FORMULA BASED ON YOUR PROPOSED CAPITAL STRUCTURE?

A. My recommended capital structure consists of 50% debt and 50% equity. Since NFGD's debt ratio is lower than my proposed capital structure, when the beta is "relevered" to match the proxy group beta, it results in a lower ROE than if NFGD had

been operating with a capital structure equal to my recommended capital structure. If the Commission were to adopt the Company's proposed capital structure consisting of 56.4% equity and 43.6% debt, then its indicated cost of equity would be 9.21%.

V. COST OF DEBT

Q. WHAT DOES NFGD PROPOSE AS THE COST OF LONG-TERM DEBT?

A. NFGD's proposed cost of long-term debt of 5.58% is the Company's embedded cost of debt for the FPFTY ending October 31, 2027.[36]

Q. DO YOU CONSIDER THE COMPANY'S REQUESTED OVERALL COST OF LONG-TERM DEBT REASONABLE?

A. Yes. The Company's proposed cost of debt is reasonable when compared to the prevailing yields on equivalent long-term debt for utilities of similar risk profiles at the time of its issuances. For instance, current (2026) expected market rates for Moody's Aaa-rated corporate bonds are 5.21% and Baa-rated corporate bonds are 5.86% and are expected to further decrease in 2027 to 5.05% and 5.83%, respectively.[37]

Q. DO YOU RECOMMEND THAT THE COMMISSION ACCEPT NFGD'S REQUESTED COST OF LONG-TERM DEBT?

A. Yes. Given the current financial circumstances, this rate is reasonable.

VI. RETURN ON EQUITY

Q. HOW DO YOU DETERMINE THE ROE FOR A REGULATED UTILITY?

A. For ratemaking purposes, the cost of equity must be estimated because it cannot be directly observed, and it varies with changing expectations of financial market

[36] NFGD St. 11 at 8:1-6; 53.53.III-E-6, Page 4 of 15.
[37] OCA Ex. MLR-1: Schedule MLR-3 (Survey of Professional Forecasters).

conditions. The cost of equity is the long-term annualized market return that investors (in general) expect when they purchase equity shares of a particular company. It reflects the risk factors of that investment as compared to alternative investment opportunities and investors' current opportunity cost of investing in the securities of that company (i.e., the investors' risk-adjusted alternatives).

Because NFGD is a wholly-owned subsidiary of NFG and is not a publicly traded company, it is not possible to directly apply cost of equity models to the Company. As an alternative, I calculate an estimate of NFGD's cost of equity by deriving average expected market returns for a proxy group of regulated gas utility companies with comparable risk.

Q. HOW DID MR. NOWAK CHOOSE THE COMPANIES FOR HIS UTILITY PROXY GROUP?

A. For his proxy group, Mr. Nowak begins with nine investor-owned domestic natural gas distribution companies that are publicly traded and listed in Value Line's Natural Gas Utility Group.[38] He then applies a series of criteria to determine his proxy group, which includes companies that have at least 50% of net operating income from regulated operations and at least 60% of their net operating income from natural gas distribution operations; companies that pay consistent quarterly cash dividends; companies that have investment grade long-term issuer credit ratings; and companies that have not publicly announced involvement in any major merger or acquisition activity.[39] After he applies these criteria, Mr. Nowak's proxy group contains seven companies.[40]

[38] NFGD St. 10 at 24-25.
[39] *Id.*
[40] *Id.*

Q. IN YOUR ANALYSIS, DO YOU MAKE ANY CHANGES TO MR. NOWAK'S PROXY GROUP?

A. No. I use Mr. Nowak's natural gas utility proxy group companies because they meet criteria that appear reasonable.[41] Also, I typically require companies in my sample to have no ongoing involvement in a major merger or acquisition, an investment-grade credit rating (BBB- or higher), and no cuts in dividend payments during the past six months. I typically exclude firms involved in any significant merger or acquisition activity because the market values of such firms differ significantly from those companies not involved in such activities. This difference would be reflected in a company's stock price and dividend yields, which would distort the estimated cost of equity. I also exclude companies that have recently cut dividend payments to shareholders because such a management decision is usually perceived by investors as a sign of financial distress.

Q. WHY DO YOU INCLUDE SPIRE, INC. IN YOUR NATURAL GAS UTILITY PROXY GROUP?

A. Although Spire, Inc. ("Spire") announced that it is acquiring the Piedmont Gas Tennessee business from Duke Energy, the acquisition is not expected to have a transformative effect on the company. Since the announcement in July 2025, there has been no meaningful change in Spire's stock price performance relative to other utility companies.

Q. PLEASE DISCUSS THE DIFFERENT TYPES OF RISK THAT A REGULATED MONOPOLY, SUCH AS A GAS UTILITY, MAY FACE.

[41] OCA Ex. MLR-1: Schedule (MLR-4) (Sample Characteristics).

A. An investor's expected return on an investment is composed of the risk-free rate and different types of risk, including inflation risk, interest rate risk, business risk, financial risk, and regulatory risk.

The risk-free rate is the level of return investors can achieve without assuming any risk. In general, most investors agree that a Treasury bond is an asset perceived by the market as having relatively less risk than other market instruments because the federal government's access to tax proceeds to fulfill its debt obligations and strong credit rating make Treasury securities practically default-free. However, Treasury bonds are not absolutely risk-free because they incorporate a risk premium associated with interest rate risk. This is the premium investors require to compensate them for the foregone opportunity cost of an alternative, higher interest rate later.

From an investor's perspective, inflation risk, also called purchasing power risk, is the chance that the cash flows from an investment will not be worth as much in the future because of changes in purchasing power due to inflation.

Interest rate risk is the risk that arises for investors from the variability in returns caused by fluctuating interest rates, which depends on how sensitive an asset's price is to interest rate changes in the market. For bonds, for example, their price sensitivity to interest rates depends on the time it takes for the bond to reach maturity and the coupon rate of the bond.

Business risk, as perceived by investors, includes all the operating factors that increase the probability that expected future cash flows accruing to investors may not be realized. Business risk would include such factors as sales volatility and operating leverage. A utility's business risk is a function of factors such as customer base

diversity, necessary capital expenditures, the regional and national economy, and the regulatory environment in which the utility operates.

Financial risk relates to the capital structure of a company, including its fixed contractual obligations and ability to pay interest on its debt and refinance that debt when it is due. Credit-rating agencies assess the financial health of a company through the use of key financial ratios that measure the extent to which a company can pay its debt, including principal and interest. Corporate rating designations that are commonly used are shown later in Table 2 of my testimony, which identifies rating categories used by S&P, Fitch, and Moody's for investment-grade issuances.

One of the key financial ratios used by credit-rating agencies is the debt ratio. The higher the portion of the capital structure that is comprised of debt or leverage, the higher the risk of default on those debt obligations.

Regulatory risk is based on the investor's perceived understanding of the current regulatory environment along with possible changes to that regulatory environment. How regulators treat regulatory lag is one example of regulatory risk. To the extent that companies face a time lag between incurring expenses and cost recovery, such risk is best measured by choosing a proxy group of companies that face similar regulatory oversight and earn the majority of their revenues from regulated operations.

A. INFLATION RISK

Q. IN YOUR VIEW, DOES NFGD FACE GREATER INFLATION RISK THAN OTHER REGULATED UTILITIES IN THE PROXY GROUP?

A. No. The risks associated with current inflation trends, which have decreased from a CPI of 8.0% in 2022 to 2.6% in 2025,[42] are shared by all regulated utilities and, as a result, are reflected in the utility proxy group's calculated costs of equity.

B. INTEREST RATE RISK

Q. IN YOUR VIEW, DOES NFGD FACE GREATER INTEREST RATE RISK THAN OTHER REGULATED UTILITIES IN THE PROXY GROUP?

A. Yes. Since changes in interest rates affect borrowing costs, the effect of such risk depends on the company's credit rating and portion of debt to total financial capital compared to the proxy group. As I discuss in greater detail in the financial risk section below, since NFGD is not credit-rated and receives debt and equity funding through its parent company, NFG, the relevant comparison is NFG's credit rating. NFG has a lower credit rating than the average of the proxy group. Thus, in general, NFGD faces higher debt cost when issuing new debt compared with the debt costs incurred by one of the proxy group companies, on average.

C. BUSINESS RISK

Q. DOES MR. NOWAK IDENTIFY ANY BUSINESS RISK THAT HE CLAIMS IS UNIQUE TO THE COMPANY?

A. Yes. Mr. Nowak lists four risk factors that justify an ROE premium: (1) capital expenditure risk, (2) small company size, (3) customer concentration risk, and (4) regulatory risk.

[42] OCA Ex. MLR-1: Schedule MLR-1.

Q. HOW DOES MR. NOWAK CHARACTERIZE NFGD'S CAPITAL EXPENDITURE RISK?

A. Mr. Nowak asserts that the Company's capital expenditure program increases risk by exposing it to the potential for under-recovery or delayed recovery of investments. Specifically, he states that "an elevated level of capital investment increases the risk of under-recovery or delayed recovery of the invested capital."[43]

Q. DO YOU AGREE WITH THIS CHARACTERIZATION?

A. No. Mr. Nowak's characterization is inconsistent with the economic framework governing regulated utilities.

Q. PLEASE EXPLAIN.

A. In a cost-of-service regulatory model, capital investment is not a discretionary risk but rather the foundation of earnings. Utilities are permitted the opportunity to recover prudently incurred capital costs through rates, including a return on invested capital. The Company's investments are largely driven by safety and reliability mandates and are incorporated into rate base through established regulatory processes.

Q. WHAT IS THE ECONOMIC FLAW IN MR. NOWAK'S REASONING?

A. Mr. Nowak treats regulatory lag as though it were a unique or extraordinary risk, when in fact it is a standard feature of utility regulation that is already reflected in industry-wide ROE benchmarks. All regulated utilities face some degree of timing difference between when investments are made and when they are reflected in rates. This does not distinguish the Company from its peers and therefore does not justify an upward adjustment to ROE.

Q. HOW DOES MR. NOWAK ADDRESS THE COMPANY'S SIZE?

[43] NFGD St. 10 at 41.

A. Mr. Nowak states that the Company's "significantly smaller size compared to the proxy companies" contributes to its risk profile.[44]

Q. DOES SMALLER SIZE, IN THIS CASE, JUSTIFY A HIGHER ROE?

A. No. The Company's size, when properly evaluated in context, does not increase its risk in a manner that warrants an ROE premium.

Q. PLEASE EXPLAIN WHY THE COMPANY'S SIZE DOES NOT JUSTIFY A HIGHER ROE.

A. The Company operates as a subsidiary of NFG, a larger holding company that provides access to capital markets, centralized financing, and operational support. As a result, the financial risks typically associated with small, standalone utilities are substantially mitigated. The Company does not independently raise capital and therefore benefits from the scale and credit profile of its parent organization.

Q. HOW DOES MR. NOWAK DESCRIBE DEMAND-RELATED RISK?

A. Mr. Nowak asserts that the Company's customer concentration exposes it to demand risk, stating that "customer concentration exposes the Company to significant risk related to natural gas demand."[45]

Q. IS THIS CONCERN VALID IN THE CONTEXT OF A REGULATED UTILITY?

A. Not to the extent suggested by Mr. Nowak. The Company operates under a regulatory framework that includes mechanisms designed to mitigate volumetric and demand risk. These mechanisms include weather normalization adjustments, distribution system improvement charges, fully projected future test years, rate design features such as fixed customer charges, and the ability to reset rates through periodic rate case

[44] NFGD St. 10 at 41.
[45] *Id.* at 52.

proceedings. Together, these features significantly reduce the sensitivity of revenues to fluctuations in customer usage.

Q. WHAT IS THE MAIN ISSUE WITH MR. NOWAK'S ARGUMENT?

A. Mr. Nowak effectively applies a commodity-market perspective to a regulated utility environment. In competitive markets, demand fluctuations directly impact revenues and profitability. In contrast, under cost-of-service regulation, revenue recovery is largely stabilized through regulatory mechanisms. As a result, the Company's exposure to demand variability is materially limited.

Q. HOW DOES MR. NOWAK CHARACTERIZE REGULATORY RISK?

A. Mr. Nowak emphasizes the importance of the regulatory environment, noting that "half of Moody's overall assessment… is based on the regulatory environment."[46] While Mr. Nowak correctly observes that regulation is a key determinant of utility risk, he does not demonstrate that the Company operates in a regulatory environment that is more adverse than those of its peers. In fact, Pennsylvania's regulatory framework includes features—such as forward-looking test years and established cost recovery mechanisms—that are generally viewed as supportive of utility financial stability. I will provide more detail regarding Pennsylvania's regulatory environment later in Section VI.E of this direct testimony.

Q. WHAT IS MISSING FROM HIS ANALYSIS?

A. Mr. Nowak does not present evidence of systematic disallowances, extraordinary regulatory lag, or other adverse regulatory outcomes that would indicate elevated risk. Without such evidence, his reliance on general statements about regulatory importance does not support a higher ROE.

[46] *Id.* at 52-53.

Q. IN YOUR VIEW, DOES NFGD FACE GREATER BUSINESS RISK THAN OTHER REGULATED UTILITIES IN THE PROXY GROUP?

A. No. The fundamental comparison here is to the proxy group. Every utility is different, but I do not believe that NFGD has greater business risk than its peers in the proxy group.

D. FINANCIAL RISK

Q. IN YOUR VIEW, DOES NFGD FACE GREATER FINANCIAL RISK THAN OTHER REGULATED UTILITIES IN THE PROXY GROUP?

A. No. NFGD faces similar financial risk compared to the proxy group. Although NFGD acquires financing through its parent company, NFG, which has a lower credit rating than the proxy group, NFGD's lower debt ratio relative to the proxy group reduces its financial risk. NFG has long-term issuer ratings from Moody's of Baa3 (Outlook: Stable), S&P of BBB- (Outlook: Stable), and Fitch Ratings of BBB (Outlook: Stable). NFG's ratings are lower than the median for the proxy group, which is an S&P rating of A-/BBB+ and a Moody's rating of A3/Baa1.

Table 2. Rating Categories (Investment Grade)

S&P and Fitch	Moody's
AAA	Aaa
AA+	Aa1
AA	Aa2
AA-	Aa3
A+	A1
A	A2
A-	A3
BBB+	Baa1
BBB	Baa2
BBB-	Baa3

Q. DOES THE CAPITAL STRUCTURE OF NFGD INDICATE THAT IT IS EXPOSED TO LESS FINANCIAL RISK THAN OTHER MEMBERS OF THE PROXY GROUP?

A. Yes. NFGD's current capital structure of 43.9% long-term debt is lower than the utility proxy group's average debt-to-total-capital ratio average of 50.69% and median of 51.57%, meaning that NFGD faces lower financial or leverage risk than the proxy group.[47]

E. REGULATORY RISK

Q. IN YOUR VIEW, DOES NFGD FACE GREATER REGULATORY RISK THAN OTHER REGULATED UTILITIES IN THE PROXY GROUP?

A. No. NFGD does not face greater regulatory risk than the proxy group. Pennsylvania has a regulatory ranking of "Above Average/2", according to S&P Market Intelligence, which is the second highest rating and outranked by only Alabama with a ranking "Above Average/1."[48] In a more recent publication by Regulatory Research Associates ("RRA"), a division of S&P Market Intelligence, RRA states that, "RRA views the regulatory climate for energy utilities in Pennsylvania to be relatively constructive from an investor standpoint …."[49] RRA continues by stating that the Commission allows utilities to employ a series of ratemaking practices meant to reduce regulatory lag, such as recovering costs using a forward-looking test year and year-end base valuations. The Commission also permits utilities to employ a series of rate mechanisms meant to recover costs in between general rate cases. Moreover, RRA notes that almost all the

[47] OCA Ex. MLR-1, Schedule MLR-4 (Sample Characteristics); OCA Ex. MLR-2 (Company Response to Interrogatory OCA VIII-4).

[48] *RRA State Regulatory Evaluations – Energy*, S&P MI, Mar. 2026, at 5.

[49] *State Commission Database*, S&P MI (last visited April 14, 2026).

cases decided since the 1990s have been resolved by black box settlements that do not disclose the settled ROE or ROR.

Q. PLEASE EXPLAIN HOW THE USE OF YEAR-END OR FULLY PROJECTED YEAR-END RATE BASE AFFECTS REGULATORY LAG.

A. The use of a year-end or fully projected year-end rate base reduces regulatory lag by aligning the level of plant included in rates with the level of plant that will actually be in service when rates are effective. Under a traditional historical or average test year approach, rates are based on plant balances that are already outdated by the time new rates are implemented. Because utilities continue to invest in infrastructure between the test year and the effective date of rates, this mismatch results in systematic under-recovery of invested capital. By contrast, a year-end or fully projected approach incorporates plant levels expected at the time rates go into effect, thereby significantly narrowing the gap between the authorized rate base and the utility's actual investment.

Q. PLEASE ELABORATE ON HOW A FUTURE TEST YEAR REDUCES REGULATORY LAG AND, ULTIMATELY, RISK.

A. A future test year allows a utility to forecast costs forward into the first full year when the proposed new rates will be in effect so that rates can be matched to costs. It significantly reduces regulatory lag, which is the time between when a utility incurs increases in costs and when it recovers costs through increases in rates.

Q. HOW DOES REDUCING REGULATORY LAG REDUCE REGULATORY RISK?

A. Reducing the time or "lag" in between rate cases or when costs increase helps mitigate regulatory risk in several ways. It allows utilities to better align their revenues with current operating expenses, which in turn improves cash flow and enhances financial

stability. By enabling more timely cost recovery, reducing lag also lowers uncertainty for investors, increasing the likelihood that a utility will achieve its authorized ROE without delay. Additionally, when rates more accurately reflect contemporaneous operating conditions, a utility can more effectively manage its expenses and maintain a sound financial position, ultimately reducing financial risk.

Q. HOW DO INVESTORS PERCEIVE THE USE OF FUTURE TEST YEARS?

A. Investors consider this type of test year to reduce regulatory risk, particularly in periods where there is a robust level of capital spending, high inflation, and rising interest rates.[50] S&P MI reports that less than a quarter of states allow a future test year.[51]

Q. IS THE REDUCTION IN REGULATORY RISK ASSOCIATED WITH A FUTURE YEAR ALREADY INCORPORATED IN YOUR ROE ESTIMATES?

A. No. I use the gas utility proxy group that includes utilities from across the country. As noted above, less than a quarter of states allow the use of future test years, so NFGD's regulatory risk is arguably lower than the proxy group.

Q. DOES NFGD HAVE ANY RATE MECHANISMS THAT CAN IMPROVE COST RECOVERY IN BETWEEN RATE CASES?

A. Yes. NFGD has a series of rate mechanisms or adjustment clauses that allow it to recover associated costs in between cases, thereby reducing recovery lag and regulatory risk. Such mechanisms also reduce business risk because they provide more predictable earnings and consistent cash flow than otherwise. These rate mechanisms include the Purchase Gas Cost Clause (Rider A), State Tax Adjustment Surcharge (Rider B), Customer Education Charge (Rider E), Customer Assistance Program (Rider F),

[50] *RRA State Regulatory Evaluations – Energy, Regulatory Research Associates*, S&P MI, May 24, 2023, at 18.
[51] *Id.*

Merchant Function Charge (Rider G), Gas Procurement Charge (Rider H), OPEB related temporary riders, and Distribution System Improvement Charge (DSIC).[52]

Q. PLEASE EXPLAIN THE PURPOSE OF THE PURCHASE GAS COST CLAUSE.

A. The purpose of the Purchase Gas Cost Clause is to recover the costs associated with supplying gas to customers. It ensures that the company can cover the expenses incurred in purchasing and delivering gas, and it is adjusted quarterly to reflect changes in these costs. This charge essentially shifts the risk associated with market price swings onto customers and provides cash flow support to the Company.

Q. WHAT IS THE PURPOSE OF THE STATE TAX ADJUSTMENT SURCHARGE.

A. The State Tax Adjustment Surcharge is recomputed whenever NFGD experiences a material change in any of the taxes used in calculating the surcharge.

Q. WHAT IS THE PURPOSE OF THE DSIC?

A. The DSIC is a surcharge that appears on consumer bills as a line item and is used to recover the reasonable and prudent costs incurred by the utility to repair, improve, or replace eligible property that is placed in service in between rate cases, subject to certain consumer protections. The DSIC permits NFGD to recover eligible costs in between general rate cases and allows NFGD to accelerate the replacement of aging infrastructure.

Q. ARE THE ABOVE-REFERENCED RIDERS CURRENTLY IN EFFECT?

A. Yes.

[52] OCA Ex. MLR-5 (Company Response to Interrogatory OCA VIII-13).

Q. DOES THE COMPANY PROPOSE A NEW WEATHER NORMALIZATION ADJUSTMENT MECHANISM IN THIS PROCEEDING?

A. No. NFGD is not proposing a new Weather Normalization Adjustment ("WNA") mechanism. Rather, it acknowledges that the WNA already exists as a pilot program, stating that "the WNA pilot was part of the 2022 Case settlement agreement approved by the Commission on June 15, 2023."[53] The Company proposes making the existing pilot permanent. Specifically, it states that it is requesting the Commission to approve the current pilot WNA mechanism, which is scheduled to expire in October 2028, as a permanent program.

Q. WHAT IS THE PURPOSE OF THE WNA?

A. The Company states that the WNA is intended "to moderate the bill impacts of unusually warm or cold weather, providing customers with greater stability while aligning billed revenues more closely with the Commission-approved revenue requirement."[54] Ultimately, the WNA shifts weather-related risk away from NFGD and onto customers by normalizing revenues regardless of usage swings.

Q. DO THESE RATE MECHANISMS REDUCE NFGD'S REGULATORY RISK?

A. Yes. Because the recovery in between rate cases is guaranteed for prudently incurred expenses, NFGD's regulatory risk is comparable to the regulatory risk of other utilities in its proxy group.

Q. HOW DO INVESTORS VIEW THESE RATE MECHANISMS?

A. Investors view these rate mechanisms favorably because they reduce regulatory lag. As discussed above, S&P MI considers these rate mechanisms as constructive but also looks at the frequency with which the adjustments occur and whether there is a true-up

[53] NFGD St. 19 at 23.
[54] *Id.* at 24.

mechanism. S&P MI addresses the DSIC mechanism in particular as contributing to Pennsylvania's "Above average/2 rating," because it allows utilities to update rates for incremental infrastructure capital investment as often as quarterly.

VII. ROE METHODOLOGIES

Q. WHAT METHODOLOGIES DO YOU USE TO DERIVE YOUR COST OF EQUITY RECOMMENDATION?

A. I use the Constant-Growth DCF model to form the basis of my recommendation of a 9.74% ROE, which is the midpoint of the range of my DCF results for NFGD. My recommendation is further supported by the average of the results of my CAPM analyses of 8.99%, which is within the range of my DCF results, demonstrating the reasonableness of my DCF analysis.

Q. WHAT IS THE PREDOMINANT ROE MODEL UTILIZED BY REGULATORY BODIES IN THE UNITED STATES?

A. For decades, the Federal Energy Regulatory Commission (FERC) and public utility commissions across the United States, including Pennsylvania, have relied primarily on the DCF model to develop a range of returns earned on investments in companies with corresponding risks for purposes of determining the ROE for regulated entities.[55] Although I use variants of the Constant-Growth DCF model and the CAPM, I rely on my Constant-Growth DCF to form the basis of my recommendation of a 9.74% ROE for NFGD.

A. CONSTANT-GROWTH DISCOUNTED CASH FLOW MODEL

Q. PLEASE DESCRIBE THE CONSTANT-GROWTH DCF MODEL.

[55] *RRA Regulatory Focus, FERC and Electric ROEs – 2022 Update*, S&P MI, Sept. 26, 2022, at 3.

A. The Constant-Growth DCF model is based on the dividend discount model first proposed by J.B. Williams in 1938.[56] The model is based on the premise that since cash dividends are the only income from a share of stock held to infinity, the value of that stock will be the present value of its stream of dividends, where the discount rate is the market's required return. The model can be modified to take into account the (more common) situation whereby shares of stock are bought and sold, producing capital gains income in addition to dividend income. To simplify the mathematics of the model, expected future dividends are represented by applying a constant-growth rate to the current observable dividend. Mathematically, the present value of an asset (common stock) is expressed as:

$$P_0 = \frac{D_1}{(K-g)},$$

Where:

D_1 is the dividend payment in one year from today or the expected dividend;
K is the rate of return used by investors to discount future dividends; and
g is the growth rate of the dividend payment.

The estimated cost of equity, K, is specified as:

$$K = \frac{D_1}{P_0} + g,$$

Where:

D_1 is the expected dividend, represented by $D_1 = D_0 (1 + g)$

Where:

D_0 is the current annual dividend per share.

[56] J.B. Williams, *The Theory of Investment Value* 45-48 (1938).

Therefore, the market ROE capital is the sum of the dividend yield (anticipated dividend payments divided by the market price) and the expected growth in dividend income.

Q. PLEASE DESCRIBE HOW YOU DERIVE THE DIVIDEND YIELD COMPONENT OF YOUR DCF ANALYSIS.

A. The dividend yield in my DCF analysis is the annual dividend per share over the next 12 months, divided by the stock price average for different historical periods ended February 27, 2026. I first calculate the dividend yields using the 30-calendar day average of closing stock prices. I also use a 90-calendar day average of closing stock prices for capturing longer market trends.

In general, the most recent price of a security can be used to calculate the dividend yield because it represents current valuations in equity markets, calculating an average, over time, to mitigate any irregularities as necessary. However, using the average of a range of dates (e.g., 30 and 90 days) helps reduce the bias that might occur from day trading-driven irregularities or short-term volatility. The average 30-calendar day stock price for the proxy group is $82.91 per share, which is more than the 90-calendar day average stock price of $79.76 per share.[57]

I then estimate the expected dividend yield by applying the growth rate component of my Constant-Growth DCF analysis. I use three variants for calculating the growth rate component. These methods produce a range of expected dividend yields from 3.29% to 3.48% using the proxy group.[58]

Q. DO YOU MAKE ANY FURTHER ADJUSTMENTS TO YOUR EXPECTED DIVIDEND YIELD?

[57] OCA Ex. MLR-1, Schedule MLR-5a-6f.
[58] *Id.*

A. Yes. I adjust the dividend yield by one-half the expected growth to reflect growth over the coming year. Since I use annualized dividends, I make this adjustment to account for the fact that companies tend to announce changes in dividends at different times throughout the year.

Q. PLEASE DESCRIBE THE GROWTH RATE COMPONENT OF YOUR DCF ANALYSIS.

A. My first set of growth rates is based on published earnings per share ("EPS") forecasts because investors typically view earnings growth as an indicator of future dividend growth. Investors also incorporate other sources of information when setting their expectations of dividend growth, which I will discuss shortly.[59]

I calculate the estimated earnings growth rates by taking the average of analysts' forecasts (which typically cover roughly the next five years) from *Value Line*, S&P MI, and Zacks. The S&P MI and Zacks websites report results incorporating forward-looking surveys of securities analysts' EPS projections. *Value Line*, in contrast, uses a historical base period average value for 2023-2025 and a forecast for 2029-2031 to calculate its growth rates, and it is not a survey. The average expected earnings growth rate using the proxy group of companies is 7.92%, with median DCF results of 10.48% and 10.61%.[60]

However, I then refine my calculation of the growth rate by averaging *Value Line's* dividends per share ("DPS") and book value per share ("BVPS") estimates with the previously estimated earnings growth rate projections weighted equally. I include these three components of growth in my analysis because investors are not only concerned with earnings growth but also dividend and book value growth as an

[59] Williams, *supra* note 56, at 47.
[60] OCA Ex. MLR-1, Schedule MLR-5a, 5c.

assurance that dividend growth will be sustained. Moreover, dividend growth rates are more stable than expected earnings growth. These calculations produce an average growth rate of 5.45%, with median DCF results of 8.88% and 9.03%.[61]

Q. WHAT IS MR. NOWAK'S OVERALL DCF-DERIVED ROE RESULT?

A. Mr. Nowak applies the DCF model using a constant growth model that is similar to my application. Using his constant growth DCF model, he applies low mean, median, mean, and mean high earnings growth rates to estimate a range of ROE results from 10.51% to 12.45%. Mr. Nowak offers a wide range of estimates in his DCF model because he isolates the growth rates by showing a set of results for his minimum growth rates, mean or average growth rates, and maximum growth rates. As I will discuss later in my testimony, this practice is misleading. In contrast, I average all my growth rates.

Q. WHY DO YOUR RESULTS DIFFER FROM MR. NOWAK'S RESULTS?

A. My DCF results using only EPS growth rates are similar to Mr. Nowak's DCF results. Since he only uses EPS growth rates in his DCF analysis, his median utility proxy group result of 10.64% (30-day average stock price) is higher than my utility proxy group results of 10.48% (30-day), and his median proxy group result of 10.68% (90-day) is slightly higher than my proxy group result of 10.61% (90-day). The notable difference between his median results and my results is due to the different time periods used for stock price averages, which reflect varying market trends. Specifically, the ending period of my stock price averages for both 30-day and 90-day averages is February 27, 2026, while the ending date for his 30-day, 90-day, and 180-day stock prices averages for his proxy group is November 28, 2025.[62]

Q. WHY ARE MR. NOWAK'S DCF GROWTH RATES PROBLEMATIC?

[61] OCA Ex. MLR-1, Schedule MLR-5b, 5d.
[62] NFGD St. 10 at 33.

A. Although his median DCF results using the utility proxy group are similar to my results, Mr. Nowak's growth rates are problematic because he only uses the EPS growth rates. While earnings growth is an important indicator of dividend growth, investors also incorporate other financial data when estimating their required returns, such as dividend growth and book value growth. Moreover, dividend growth rates are more stable than expected earnings growth because dividends are determined by the company's dividend payout policy. Later in this direct testimony, I will show that incorporating other growth rates yields even lower ROE estimates.

Mr. Nowak's growth rates are also problematic because he isolates the growth rates by showing a set of results for his minimum growth rates, mean or average growth rates, and maximum growth rates. This practice is misleading because he appears to only use his DCF results that are based on his highest growth rates when providing his recommended ROE of 11.25%.

Q. WHAT EFFECTS DO MR. NOWAK'S GROWTH RATES HAVE ON HIS DCF RESULTS?

A. If Mr. Nowak were to incorporate more than just earnings growth, as I have done with respect to dividend growth and book value growth, his DCF estimates would be lower.

B. <u>SUSTAINABLE-GROWTH DISCOUNTED CASH FLOW MODEL</u>

Q. DO YOU EMPLOY OTHER METHODS TO DERIVE GROWTH RATES IN YOUR DCF MODEL?

A. Yes. I also use the sustainable growth method to estimate the rate of dividend growth. The standard DCF model assumes only one source of equity financing, namely the

retention of earnings. Growth in earnings and dividends, however, can also be achieved by the sale of new common equity.[63] The basic Constant-Growth DCF model of:

$$K = \frac{D_1}{P} + g$$

can be rewritten to assume that external sources of financing influence investor expectations of dividend growth, and is represented as the following:

$$K = \frac{D_1}{P} + br + sv$$

Therefore:

$$G = br + sv,$$

Where:

G is the retention growth rate;

b is the portion of retained earnings or 1 minus payout ratio;

r is the earned rate of return;

s represents the funds raised from the sale of stock as a fraction of existing common equity; and

v is the fraction of funds raised from the sale of stock that accrues to current shareholders.

I use *Value Line* expectations regarding retention ratios and ROEs for five years into the future to derive estimates for *b* and *r*, which in turn are used to calculate the expected internal growth component, *br*. To incorporate external financing growth, *sv*, I use *Value Line* data to derive the market-to-book ratio (which is an actual, observed figure) and expected growth in the number of outstanding shares. The average

[63] This expanded version of the DCF model allows for the value of stocks to vary from book values. If the stock prices equal book value, then the equity held by new shareholders is equal to the funds they invest and the existing shareholders' equity is not changed. If, however, stock prices are greater than book value, a portion of the funds accrues to the existing shareholders, thereby increasing their expectations of dividend growth in the future. David Parcell, *The Cost of Capital – A Practitioner's Guide* 144-45 (2010).

sustainable growth rates for my proxy group is 6.87% (30-calendar day stock prices) and 6.67% (90-calendar day stock prices).[64]

Q. DO YOU APPLY A REASONABLENESS SCREEN TO YOUR INDIVIDUAL ROE RESULTS USING THE DCF METHOD?

A. Yes. After adding the growth-rate estimates and the dividend-yield estimates for each company in my proxy group to obtain the individual ROE estimates, I examined individual company ROE results for reasonableness and whether some results are extreme outliers. Thus, in lieu of relying on the average of my proxy group results for each model, I use the median. The median is the middle value of a set of data and is not skewed by outliers.

Q. PLEASE SUMMARIZE YOUR DCF MODEL RESULTS.

A. As shown in Table 3 below, I employ three different methods for deriving the growth rate in the DCF model, yielding three sets of estimates of the ROE for my proxy group. First, I use the Constant-Growth DCF model using only EPS growth rates. Assuming that investors are only concerned with earnings growth when valuing a company's stock, thereby only using EPS growth in the DCF model, I derive ROE estimates of 10.48% (30-calendar day stock prices) and 10.61% (90-calendar day stock prices).[65]

Second, I use the Constant-Growth DCF model using EPS, DPS, and BVPS growth rates. Once I allow for other sources of growth, such as DPS and BVPS growth rates, to influence investors' expectations of the return on a particular equity, my analyses yield lower results. For instance, incorporating DPS and BVPS growth rates

[64] OCA Ex.MLR-1, Schedule MLR-6c, 6f.
[65] OCA Ex. MLR-1, Schedule MLR-5a, 5c.

results in median ROE estimates of 8.88% (30-calendar day stock prices) and 9.03% (90-calendar day stock prices).[66]

Third, I use the Sustainable-Growth DCF model. When I allow for both internal and external funding sources to drive growth in investor income, for my sustainable growth rate model, I derive median ROE results of 9.87% (30-calendar day stock prices) and 10.03% (90-calendar day stock prices), after adjusting for reasonable growth rates.[67] The overall range of ROE estimates using my DCF is 8.88% to 10.61%, with a midpoint of 9.74%.

TABLE 3. RENO DCF RESULTS (AVERAGE RESULTS)

Estimated Return on Equity	**ROE**		
DCF Methodology	30-Day Stock Price	90-Day Stock Price	Midpoint
Constant-Growth DCF (EPS Growth)	10.48%	10.61%	
Constant-Growth DCF (DPS, EPS and BVPS)	8.88	9.03	
Sustainable-Growth DCF	9.87	10.03	
DCF Range (Min. & Max.)[1]	**8.88%**	**10.61%**	**9.74%**

[1] ROE range (minimum and maximum values) for the 30-day and 90-day DCF results.

Q. HOW DOES YOUR METHODOLOGY FOR CALCULATING THE DCF GROWTH RATE DIFFER FROM THAT OF MR. NOWAK?

A. The major differences in our Constant-Growth DCF methodologies are that Mr. Nowak only uses earnings growth rates in his DCF model to develop his ROE recommendation. As discussed previously, if Mr. Nowak were to conduct his DCF method using other growth rates in addition to EPS growth, he would derive lower

[66] OCA Ex. MLR-1, Schedule MLR-5b, 5d.
[67] OCA Ex. MLR-1, Schedule MLR-6c, 6f.

ROE estimates. Applying Mr. Nowak's EPS-only growth rate approach to my model yields ROE results of 10.48% and 10.61% over the 30-day and 90-day periods, as shown above in Table 3. However, because the DCF estimate is derived from the concept that cash dividends are the only income from a share of stock, in principle, the growth component should only include dividends. Investors, however, are also concerned about whether dividends are sustainable, and they are concerned over how earnings and book value growth affect dividend growth sustainability. As a result, investors may not necessarily use a single growth estimate when valuing a utility's stock. Therefore, I believe it appropriate to include other estimates for the growth component in my analysis.

C. CAPITAL ASSET PRICING MODEL

Q. DO YOU USE ANY OTHER METHODOLOGIES TO ESTIMATE THE ROE FOR NFGD?

A. Yes. I also apply the CAPM to derive a total of three ROE estimates, which serve as a check of the reasonableness of my DCF results. However, my recommended ROE is not based on my CAPM results. My CAPM results range from 7.43% to 10.55% with a midpoint of 8.99%.

Q. PLEASE DESCRIBE THE CAPM.

A. The CAPM is a version of the "risk premium" approach that is rooted in modern portfolio theory. It recognizes that common equity capital is riskier than debt from an investor's perspective because debt holders are typically paid before shareholders, and as such, investors require higher returns on stocks than on bonds to be compensated for

the additional risk.[68] The cost of common equity is represented by the following equation:

$$K_e = R_f + \beta_s * RP,$$

Where:

K_e is the cost of equity;

R_f is the yield on risk-free securities;

β_s or Beta coefficient ("Beta") is a company-specific measure that reflects the movement in a company's stock price relative to movements in a composite group of companies representing the stock market. Beta measures the investment risk that cannot be eliminated by holding a diverse portfolio of assets; and

RP is the equity risk premium ("ERP") demanded by shareholders to accept equity relative to debt.

Q. PLEASE DESCRIBE THE RISK-FREE RATE YOU USE IN YOUR CAPM ANALYSIS.

A. The first term in the CAPM is the risk-free rate (R_f). I use the yield on the 30-year T-bond observed over a recent 30-day period ended February 27, 2026, of 4.76%, based on recent market information.[69] I also include in one of my CAPM analyses the Kroll (formerly Duff & Phelps) Normalized Risk-Free Rate of 3.50%.[70]

Q. DOES YOUR RISK-FREE RATE DIFFER FROM THE RISK-FREE RATE USED BY MR. NOWAK?

A. Yes. Mr. Nowak relies on three estimates of the risk-free rate: (1) the current 30-day average yield on 30-year Treasury bonds (4.66%); (2) a projected 30-year Treasury

[68] The CAPM is generally superior to the simple risk premium method because the CAPM recognizes the risk of a particular company or industry through the use of betas, whereas the simple risk premium method assumes the same risk premium for all companies exhibiting similar bond ratings.

[69] *Selected Interest Rates (Daily)*, Fed. Rsrv., https://www.federalreserve.gov/releases/h15 (last visited Apr. 10, 2026).

[70] *Impact of the Middle East Conflict on Cost of Capital Assumptions – March 2026 Update*, Kroll, Mar. 24, 2026, at 4.

yield for Q1 2026 through Q1 2027 (4.60%); and (3) the projected 30-year Treasury yield for the period 2027-2031 (4.60%).[71] His projected 30-year Treasury yield is the average of a series of forecasted rates provided by *Blue Chip Financial Forecasts* ("*Blue Chip*").[72] By comparison, I derive a risk-free rate of 4.76%, using the 30-day average of the yield on the 30-year T-bond, ended February 27, 2026. Both our actual risk-free rate averages are higher than published forecasts of the expected risk-free rate of 3.50% published by Kroll.

Q. HOW DO YOU CALCULATE THE EQUITY RISK PREMIUM?

A. In each of my three CAPM analyses, I use different estimates of the ERP that range from 5.00% to 7.37%. For the high end of this range, I use the Kroll estimate of the historical arithmetic average of real market returns over the period 1926 to 2025, which is the total return on common stocks (S&P 500) including capital appreciation, less the income returns on T-bond investments.[73]

Kroll also provides an updated Ibbotson & Chen supply-side model, which found that the market risk premium based on the S&P 500 was influenced by an abnormal experience of price-to-earnings ("P/E") ratios relative to earnings and dividend growth over the last 30 years. Thus, Kroll adjusted this market risk premium and published a long-horizon, supply-side ERP of 6.31%.[74]

Kroll also recommends a forward-looking ERP that was derived in conjunction with a normalized risk-free rate. Thus, my final CAPM analysis uses the Kroll Recommended U.S. ERP of 5.00% and Normalized Risk-Free Rate of 3.50%.[75]

[71] NFGD St. 10 at 35.
[72] *Id.*
[73] OCA Ex. MLR-1, Schedule MLR-7a-b.
[74] OCA Ex. MLR-1, Schedule MLR-7c-d.
[75] OCA Ex. MLR-1, Schedule MLR-7e-7f; Kroll, *supra* note 70, at 4.

Therefore, the estimated ERP used across my three CAPM methods ranges from 5.00% to 7.17%.

Q. DO YOU CALCULATE YOUR ERP THE SAME WAY AS MR. NOWAK?

A. No. While I rely on historical market return data from Kroll that is in line with the current expectations of market returns, Mr. Nowak calculates his Market Risk Premium, which is based on the expected total return on the S&P 500 Index less the 30-year Treasury bond yield. He estimates the expected total return on the S&P 500 Index using his DCF analyses for companies listed in the S&P 500 for which dividend yields and long-term earnings projections are available. As I previously discussed, Mr. Nowak relies solely on earnings growth projections in his DCF analyses. Applying such growth rates in his CAPM produces a weighted dividend yield of 1.16% and a long-term annual growth rate of 13.85%, yielding an estimated required annual market return for the S&P 500 Index of 15.09%. As a result, his implied market risk premiums over an average risk-free rate range from 10.43% to 10.79%.[76]

Mr. Nowak also applies FERC's more conservative convention to consider only a subset of S&P 500 companies with growth rates between 0% and 20% to estimate an expected market return of 11.62%, with a market risk premium ranging from 6.96% to 7.02%.

Q. WHY ARE YOU CONCERNED ABOUT MR. NOWAK'S EXPECTED MARKET RISK PREMIUMS?

A. Mr. Nowak's estimated 11.62% market return, based on estimated required market returns for the S&P 500 Index as of November 28, 2025, far exceeds investors' current expectations of equity returns, and only serves to inflate his average equity risk

[76] NFGD St. 10 at 34-36.

premiums and resulting ROE estimates. By comparison, the Federal Reserve Bank of Philadelphia reported earlier this year that the average (mean) forecast of expected stock returns (S&P 500) over the next ten years (2026-2035) is 7.31% and the median is 7.00%.[77]

Q. HOW DO YOU ACCOUNT FOR THE VARIABILITY IN EQUITY MARKETS?

A. To capture investors' expected equity market returns, I focus on longer trends in stock market returns from 1928 to 2025. This period shows annual stock returns over multiple business cycles, avoiding the influence of any given period.[78]

Q. HOW DO YOU ADJUST THE EQUITY RISK PREMIUM TO ACCOUNT FOR COMPANY-SPECIFIC RISK?

A. I multiply company-specific betas by the ERPs to account for company-specific risk. I rely on *Value Line* betas because *Value Line* is widely used by the utility regulatory community and investment community in general. It is also known that *Value Line* adjusts its betas to account for the long-term tendencies of stocks to converge to a beta of one (1.0).[79] As a result, *Value Line* betas tend to have higher values than betas provided by some other sources. The average *Value Line* beta for the proxy group is 0.79. A beta value of 0.79 means that the stock price movement is less than the movement, in percentage terms, of the overall stock market. The price of a gas utility stock is, therefore, less volatile and less risky than the overall market.

Q. WHAT ARE THE RESULTS OF YOUR CAPM ANALYSES?

[77] Fed. Rsrv Bank Philadelphia, *supra* note 21, at 19, Table 9.

[78] A business cycle typically includes an expansion and a recession that can vary in duration.

[79] Marshall Blume investigated the regression tendency of betas and reached the conclusion that betas have the tendency to approach a value of one (1) over time. That is, high-beta portfolios tend to decline over time toward one (1), while low-beta portfolios tend to increase to one (1). Marshall Blume, *Betas and Their Regression Tendencies*, J. Finance 785, 785-96 (1975).

A. As shown in Table 4 below, applying the same risk-free rates, market risk premium, and betas from the proxy group, I estimate expected returns ranging from 7.43% to 10.55%, with a midpoint of 8.99%.

TABLE 4. CAPM ESTIMATED ROE RESULTS

	ERP	Beta-Adjusted ERP	Risk-Free Rate	CAPM ROE	Max	Midpoint
CAPM (Hist. L-T ERP)	7.37	5.79	4.76	10.55%		
CAPM (Supply-Side ERP)	6.31	4.96	4.76	9.72%		
CAPM (Kroll Recommended ERP)	5.00	3.93	3.50	7.43%		
CAPM Range				7.43%	10.55%	8.99%

Q. WHY DO YOUR RESULTS DIFFER FROM MR. NOWAK'S RESULTS?

A. My results for the proxy group, shown in Table 4 above, are lower than Mr. Nowak's (average or mean) CAPM results, which range from 11.07% to 11.30%.[80] My results for my proxy group are lower than his results, which range from 7.43% to 10.55%, with a midpoint of 8.99%. As stated previously in my testimony, his preference for inflated market returns, EPS growth rates, and resulting high equity risk premium exaggerates both his CAPM estimates.

Q. DO YOU HAVE ANY OTHER CONCERNS REGARDING MR. NOWAK'S ROE METHODOLOGIES?

A. Yes. In addition to Mr. Nowak's focus on earnings growth in his DCF, reliance on inflated market equity returns, as discussed earlier in this testimony, he also wrongly applies his Bond Yield Plus Risk Premium Approach.

[80] NFGD St. 10 at 37.

Q. HOW DOES MR. NOWAK APPLY HIS BOND YIELD PLUS RISK PREMIUM APPROACH?

A. Mr. Nowak first estimates the equity risk premium using the difference between authorized ROEs and the prevailing 30-year Treasury bond yield, using the average authorized ROEs for 863 natural gas utility rate proceedings from January 1, 1992, through November 28, 2025. Mr. Nowak relies on three estimates of the risk-free rate: (1) the current 30-day average yield on 30-year Treasury bonds (4.66%); (2) a projected 30-year Treasury yield for Q1 2026 through Q1 2027 (4.60%); and (3) the projected 30-year Treasury yield for the period 2027-2031 (4.60%). Mr. Nowak then applies a regression analysis to estimate the relationship between bond yields and the equity risk premium. Using regression analysis, he finds that the equity risk premium increases as interest rates fall. Mr. Nowak then adds his resulting risk premiums of 5.76%, 5.79%, and 5.79% to his three risk-free rates to estimate ROE estimates of 10.41%, 10.39%, and 10.39%.[81]

Q. WHAT IS PROBLEMATIC ABOUT MR. NOWAK'S BOND YIELD PLUS RISK PREMIUM APPROACH?

A. Mr. Nowak's application of this model is problematic for a couple of reasons. First, Mr. Nowak's approach assumes a simplistic inverse relationship without any regard to differences in investment risk. Although interest rates are an important factor in assessing current and expected market equity risk premiums, the risk premium is also determined by changes in the market's perception of investment risk of debt and equity securities. This relationship can also be influenced by interest rate volatility. Moreover, his analysis focuses on nominal interest rates, thereby ignoring the effect of inflation

[81] *Id.* at 39.

on risk premiums. Second, his use of the authorized ROEs means that the risk premium measures commission decisions, not investors' behavior. Equity and bond rates in general reflect the financial decisions of investors in light of company-specific financial data, such as dividend yields, expected growth rates, assessments of risk, and the opportunity cost of other investments. However, authorized ROEs reflect other factors considered by commissions such as capital structure, credit ratings, the individual performance of these utilities in carrying out their duty to provide safe and reliable services (customer service performance metrics, etc.) and other risk measures, particularly if authorized returns were set through settlements and not fully litigated.

VIII. CRITIQUE OF MR. NOWAK'S ROE ADDERS

Q. WHAT ADJUSTMENTS DOES MR. NOWAK MAKE TO ACCOUNT FOR HIS CLAIM THAT NFGD FACES UNIQUE RISK?

A. Mr. Nowak makes two adjustments to his base ROE models that include a size risk adjustment and a management efficiency adjustment.

A. SIZE RISK ADDER

Q. WHAT SIZE RISK ADJUSTMENT DOES MR. NOWAK ADD TO HIS BASE ROE RESULTS?

A. While Mr. Nowak did not make a specific adjustment to reflect the Company's size, he uses his analysis to show that NFGD's cost of equity is higher than the midpoint of his range of proxy group results. He claims that this is necessary to account for NFGD's greater business risk relative to his utility proxy group due to its smaller relative size.

Q. HOW DOES MR. NOWAK QUANTIFY NFGD'S SIZE RISK?

A. Mr. Nowak begins by applying the proxy group median market-to-book ratio of 1.61 to NFGD's historical test year book equity balance of $768 million, finding that the Company's implied market capitalization is $1.24 billion, or 23.92% of the proxy group median market capitalization of $5.17 billion. He also estimates each of the proxy group companies' market capitalization and assigns the corresponding market quartile size premium provided by Kroll Cost of Capital Navigator-Size Premium: Annual Data as of December 31, 2024. Then, he compares the proxy group median size premium to NFGDs estimated size premium for a difference of 0.14%. However, he does not directly apply this difference to his base ROE results.[82]

Q. DO YOU AGREE THAT AN ADJUSTMENT FOR NFGD'S SIZE IS NECESSARY?

A. No. I disagree with Mr. Nowak's assessment of NFGD's size risk for a couple of reasons. First, the foundation of his calculations uses 2025 Kroll Associates size premium (formerly SBBI Center for Research in Security Prices ["CRSP"]) data that are based on the premise that small publicly owned companies are inherently riskier than large publicly owned companies and thus require a higher cost of capital. It is not clear whether these differences in returns are due to size itself or to other factors that tend to be statistically correlated with size. In the words of the "Dean of Valuation," New York University finance professor Aswath Damodaran,[83] the size effect is "fiction."[84] Mr. Nowak fails to acknowledge that the smaller companies reflected in

[82] *Id.* at 44-47; NFGD Ex. JCN-8.

[83] Aswath Damodaran is a Professor of Finance at NYU Stern School of Business and is widely recognized as a leading authority on valuation, corporate finance, and investment analysis. He has authored multiple seminal books on valuation and provides widely used public data and models on cost of capital and equity risk premiums that are relied upon by practitioners, academics, and regulators.

[84] *Size Effect is 'Fiction,' Damodaran Reiterates*, 225-4 BVWire (June 30, 2021), *https*://www.bvresources.com/articles/bvwire/size-effect-is-fiction-damodaran-reiterates.

the SBBI database tend to be engaged in riskier businesses than larger companies, which is not the case for regulated monopolies, such as natural gas utility companies.

Second, Mr. Nowak fails to acknowledge that NFGD is a subsidiary of a much larger corporation and benefits from shared affiliate services including financial support, such as debt and equity, and other resources as needed. Therefore, the more appropriate analysis would be to compare the market capitalization of the parent company with the proxy group median.

Q. IS A SIZE RISK ADJUSTMENT NECESSARY?

A. No. As shown above, a size risk adjustment is not necessary and only serves the purpose of increasing Mr. Nowak's recommended ROE. Therefore, the Commission should disregard this implied adjustment.

B. MANAGEMENT EFFICIENCY ADDER

Q. WHAT MANAGEMENT EFFICIENCY ADJUSTMENT DOES MR. NOWAK ADD TO HIS ROE RESULTS?

A. Mr. Nowak adds a management efficiency adjustment of 25 basis points to his base ROE estimate, increasing his recommended ROE from 11.00% to 11.25%.

Q. WHY DOES MR. NOWAK BELIEVE THAT A 25-BASIS-POINT ADJUSTMENT TO HIS MARKET-DERIVED RESULTS IS NECESSARY?

A. Mr. Nowak states that he recommends a 25-basis point premium to recognize the Company's exceptional performance and efficiency as summarized in the direct testimony of Rebecca E. Hillery and claims that the Commission's practice has been to recognize management performance through a rate of return incentive.

Q. PLEASE SUMMARIZE MS. HILLARY'S ASSESSMENT OF THE COMPANY'S MANAGEMENT EFFICIENCY?

A. According to Ms. Hillery's testimony, the Company is a leader and sets the bar in many areas, claiming its metrics indicate exceptional management effectiveness and performance, which benefit customers through the provision of safe and reliable natural gas service at affordable rates.[85]

Q. HAS THE COMMISSION GRANTED A UTILITY'S REQUEST TO APPLY A MANAGEMENT EFFICIENCY ADDER TO A UTILITY'S ALLOWED RETURN ON EQUITY IN OTHER RATE CASES?

A. Yes, however, I am only aware of a few instances where the Commission awarded a fixed basis-point adder for management performance. The Commission has, in the past, approved management adders where the Company "presented substantial evidence of management effectiveness in a number of areas."[86]

Q. DO YOU AGREE THAT A SEPARATE MANAGEMENT EFFICIENCY ADDER IS APPROPRIATE?

A. No. The proposed adder is unsupported by the record, duplicative of elements already embedded in the ROE, and inconsistent with established ratemaking principles.

Q. WHY IS THE PROPOSED ADDER UNSUPPORTED?

A. The Company does not provide any quantitative methodology, empirical analysis, or market-based evidence to support either the existence or the magnitude of the proposed 25 basis point adjustment. Instead, the Company relies on generalized and subjective statements regarding its performance, including the assertion that it "is a leader… in many of the areas and metrics that indicate exceptional management effectiveness."[87] Such qualitative characterizations do not establish a measurable or replicable basis for

[85] NFGD St. 1 at 34.
[86] *Pa. PUC v. UGI Electric*, Docket No. R-2017-2640058 et al., Order at 112 (Oct. 4, 2018).
[87] *Id.*

increasing the allowed ROE and therefore do not meet the evidentiary standard required for ratemaking.

Moreover, OCA witness LeeAnn M. Wise describes the Company's performance as average, stating the following in her direct testimony:

> NFGD's request for a higher rate of return based on management performance should be denied. NFGD has not provided documented evidence of superior managerial and customer service performance that would warrant a reward or additional adjustment to its authorized rate of return. NFGD has not demonstrated that its service levels exceed established standards or materially outperform reasonable expectations in a manner that would justify an additional performance adjustment. And most importantly, they have not shown how these metrics produce benefits to customers. In most areas its performance aligns with the average of other Pennsylvania natural gas distribution companies, and, in some important areas, its performance is below the norm. The Company should focus on increasing the completion rates of meter readings, reducing busy-out occurrences, and decreasing the total number of customer complaints. I recommend requiring the company to perform regular, thorough root cause analyses of complaint trends, covering both internal disputes and BCS informal complaints, to identify and document infractions and confirmed violations.[88]

Q. WHY IS THE PROPOSED ADDER DUPLICATIVE?

A. The proposed adder is duplicative because management performance is already reflected in the ROE results produced by standard financial models. Mr. Nowak develops a model-based ROE range of "10.30 percent to 11.30 [percent]" based on market data from comparable companies.[89] These comparable companies' returns inherently reflect investor expectations regarding management quality, operational efficiency, and execution risk. By adding a separate 25 basis point "management efficiency premium" on top of this range, the Company is effectively double counting the same factor that is already embedded in the model results.

[88] OCA St. 5 at 5, 7-12, 14.
[89] NFGD St. 10 at 56.

Q. DOES THE COMPANY DEMONSTRATE THAT ITS ROE MODELS FAIL TO CAPTURE MANAGEMENT PERFORMANCE?

A. No. The Company provides no evidence that its ROE models exclude or understate management performance. There is no indication in Mr. Nowak's testimony that the model-derived ROE range is deficient or requires an upward adjustment to account for management-related factors. Instead, the adder is applied as a discretionary increment above the model results without any demonstrated analytical gap.

Q. WHY IS THE PROPOSED ADDER INCONSISTENT WITH REGULATORY PRACTICE?

A. The proposed adder is inconsistent with regulatory practice because it introduces a subjective and non-standard adjustment that lacks a clear, administrable framework. The Company relies on general claims of effective management, including statements that its management "has effectively implemented … obligations in a disciplined and consistent manner."[90] However, such performance reflects the expected obligation of any regulated utility to provide safe and reliable service. It does not constitute an extraordinary circumstance that would justify a discrete numerical premium to ROE.

Q. WHAT IS THE APPROPRIATE CONCLUSION REGARDING MR. NOWAK'S JUSTIFICATION FOR THE 25-BASIS POINT ADDER?

A. The Commission should reject the proposed 25 basis point management efficiency adder. A reasonable ROE can be determined based on the Company's risk profile and the results of standard financial models without any separate adjustment for management performance.

[90] NFGD St. 16 at 27.

IX. ALTERNATIVE RETURN ON EQUITY

Q. DID YOU ESTIMATE THE IMPACT THAT YOUR CAPITAL STRUCTURE RECOMMENDATION COULD HAVE ON THE COMPANY'S INDICATED COST OF CAPITAL?

A. Yes. I estimate the impact of my recommended capital structure on the Company's cost of capital estimate by using the Hamada model.

Q. WHAT IS THE HAMADA MODEL?

A. The Hamada model is best thought of as a capital-structure adjustment for beta applying the CAPM and is not a standalone model. In its standard form, it links a firm's unlevered beta (business risk) to its levered beta (equity risk after debt financing):

$$\beta_L = \beta_U[1+(1\text{-}T)]\,{}^{D}/_{E}$$

Where T is the corporate tax rate and D/E is the debt-to-equity ratio. In the usual implementation, the formula assumes debt has little or no market beta; more complete variants adjust for a nonzero debt beta.

The purpose of the Hamada model is to separate operating risk from financing risk. The unlevered beta captures the risk of the underlying assets or business franchise. Leverage then reallocates that risk: because debt holders have a prior claim, equity becomes a thinner residual claim, so its cash flows become more sensitive to underlying shocks. The result is a higher equity beta, and therefore a higher CAPM cost of equity, as leverage rises. The tax term reflects the fact that interest deductibility softens the effective burden of debt.

In practice, economists and valuation analysts use the Hamada model for two related tasks. First, they unlever peer betas to compare firms on a common business-risk basis, abstracting from capital-structure differences. Second, they relever that business beta to a target capital structure in order to estimate a firm's required return on equity, often as an input to CAPM and WACC. Professor Aswath Damodaran's bottom-up beta procedure follows exactly this logic and recommends relevering with the firm's market debt-to-equity ratio.

Q. WHAT DATA INPUTS DO YOU USE WHEN USING THE HAMADA VERSION OF THE CAPM?

A. I use my 30-day average of yields on the 30-year Treasury bond of 4.76%, the proxy group's average beta, and the average of my market risk premium of 6.23%.

Q. PLEASE SUMMARIZE THE RESULTS OF THE HAMADA FORMULA BASED ON YOUR PROPOSED CAPITAL STRUCTURE?

A. My recommended capital structure consists of 50% debt and 50% equity. Since NFGD's debt ratio is lower than my proposed capital structure, when the beta is "relevered" to match the proxy group beta, it results in a lower ROE than if NFGD had been operating with a capital structure equal to my recommended capital structure. The results of my Hamada model are shown in Table 5 below.

Table 5. Hamada Model
Unlevered Beta

Proxy Debt Ratio	50.00%
Proxy Equity Ratio	50.00%
Proxy Debt / Equity Ratio	100.00%
Tax Rate	26.52%
Average Equity Risk Premium	6.23%
Risk-free Rate	4.76%
Proxy Group Beta	0.79
Unlevered Beta	0.46

Relevered Betas and Cost of Equity Estimates

Debt Ratio	D/E Ratio	Levered Beta	Cost of Equity
0.0%	0.00	0.46	7.60%
20.0%	0.25	0.54	8.12%
25.0%	0.33	0.57	8.29%
30.0%	0.43	0.60	8.49%
43.6%	**0.77**	**0.71**	**9.21%**
50.0%	1.00	0.79	9.68%
60.0%	1.50	0.96	10.72%

Thus, if the Commission were to adopt the Company's proposed capital structure consisting of 56.4% equity and 43.6% debt, then its indicated cost of equity would be 9.21%.

X. ROR AND ROE RESULTS SUMMARY

Q. PLEASE SUMMARIZE YOUR ROR RESULTS.

A. For NFGD, I recommend an overall ROR of 7.66%, which is composed of (1) a capital structure of 50.0% equity and 50.0% long-term debt; (2) a cost of long-term debt of 5.58%; and (3) an ROE of 9.74%. If the Commission rejects my hypothetical capital structure, then I recommend an overall ROR of 7.62%, which includes (1) a capital

structure of 56.4% equity and 43.60% long-term debt; (2) a cost of long-term debt of 5.58%; and (3) an ROE of 9.21%.

Q. HOW DOES YOUR PROPOSED ROR OF 7.66% COMPARE TO RECENT AND HISTORICAL ALLOWED ROR VALUES APPROVED BY REGULATORY COMMISSIONS ACROSS THE COUNTRY?

A. According to S&P MI, the average allowed ROR for distribution natural gas utilities in Calendar Year (CY) 2025 was 7.22%, with a median value of 7.17%, a minimum of 5.99%, a maximum of 8.03%, and a mode of 7.16%. For CY 2024, the average allowed ROR was 7.26%, with a median of 7.21%, a minimum of 5.80%, a maximum of 8.80%, and a mode of 7.01%.[91]

While I acknowledge that ROR values for different utilities are influenced by factors such as approved ROE level, capital structure, and cost of debt, it is noteworthy that my proposed ROR of 7.66%, if approved by the Commission, would be significantly higher than those recently authorized by other state regulators.

Looking at a broader historical perspective, over the 10-year period from January 1, 2016, through January 1, 2026, the average ROR awarded by state regulators has been 7.07% across 361 general rate cases for distribution natural gas utilities.[92] Notably, in this same period, there have been only 34 instances—out of 330 cases—where a state commission approved an ROR higher than my proposed 7.66%.[93]

By contrast, NFGD's proposed ROR of 8.78% is inconsistent with recent regulatory precedent and exceeds the levels typically approved in the U.S. over the last decade. Over the past ten years, out of 361 rate cases in which a state regulator approved

[91] Derived from data provided by S&P MI, reflecting only distribution natural gas utilities for which S&P MI reported an ROR value.
[92] *Id.*
[93] *Id.*

an ROR level, only one utility was granted an ROR exceeding 8.78%.[94] My proposed ROE of 7.66% is much more reasonable than NFGD's request. I urge the Commission to adopt my proposed ROR, as it better aligns with recent regulatory trends while still accounting for the necessary financial considerations related to NFGD.

Approving an ROR that significantly deviates from historical norms risks setting a precedent that could lead to unjustified rate increases for consumers and undermine regulatory consistency. A balanced approach—one that recognizes financial needs of NFGD while staying grounded in recent precedent—is the best path forward for the Commission.

Q. PLEASE SUMMARIZE YOUR ROE RESULTS.

A. As shown in Table 6 below, my ROE recommendation of 9.74% is the midpoint of my DCF results and falls with my DCF range of 8.88% to 10.61% and represents a fair and reasonable ROE for NFGD for the reasons I have previously discussed. The minimum of my range is the minimum of my DCF results, and the maximum of my range is the maximum result derived from my DCF results.

[94] *Id.*

TABLE 6. ROE ESTIMATES (%)

DCF Methodology	30-Day Stock Price	90-Day Stock Price	Midpoint
Constant-Growth DCF (EPS Growth)	10.48	10.61	
Constant-Growth DCF (DPS, EPS and BVPS)	8.88	9.03	
Sustainable-Growth DCF	9.87	10.03	
DCF Range (Minimum & Maximum):	**8.88**	**10.61**	**9.74**

CAPM Methodology	CAPM	Max	Midpoint
Capital Asset Pricing Model (Lg. Stock ERP, 30-yr T-Bond Rate)	10.55		
Capital Asset Pricing Model (Supply-Side ERM, 30-yr T-Bond Rate)	9.72		
Capital Asset Pricing Model (Kroll Normalized Rate)	7.43		
CAPM Range (Minimum & Maximum):	**7.43**	**10.55**	**8.99**

Summary			
DCF-Based ROE Average			9.81
	Min	**Max**	**Midpoint**
ROE Range	8.88	10.61	9.74
Recommended ROE			**9.74**
Recommended ROE if using NFGD's Capital Structure			**9.21**

Q. WHY IS YOUR ROE RECOMMENDATION OF 9.74% BASED ON A RANGE DERIVED FROM YOUR DCF METHODOLOGIES?

A. I place more emphasis on my DCF-derived results because it is widely used by both the finance community and public utility commissions across the country and yields more reliable results. It is a forward-looking model that directly incorporates investors' expectations of company dividend income through current market pricing signals, particularly in the case of utility stocks where stock valuations are telling a different story than the general market. The DCF also reflects recent developments in

management decisions regarding key financials reflected in expected dividend and earnings growth.

The CAPM results, by contrast, are largely reliant on financial market outcomes complicated by monetary policy and investors' expectations of inflation and economic growth over the long run. Specifically, the estimated risk-free rate has a direct impact on the estimated ROE and is largely influenced by the analyst's assumptions. Moreover, the CAPM lacks a direct and immediate link between stock prices and the results. Although the beta coefficient in the CAPM reflects changes in the ROE, such information is delayed. However, I rely on my CAPM results as a reasonableness check.

Q. HOW DOES YOUR RECOMMENDATION COMPARE TO RECENTLY ALLOWED EQUITY RETURNS?

A. My recommended ROE of 9.74% is in line with current allowed ROEs issued by regulatory commissions across the country. S&P MI reports that the average allowed equity return for natural gas utilities for 2025 was 9.70%, which is lower than the average for 2024 of 9.71%.[95] My recommended ROE of 9.74% is only four basis-points higher than the average allowed ROE for gas utilities in 2025.

Q. HOW DOES NFGD'S ROE RECOMMENDATION COMPARE TO RECENTLY ALLOWED EQUITY RETURNS?

A. NFGD's recommended ROE of 11.25% is 115 basis-points higher than the average allowed ROE for gas utilities for 2024. Thus, if the Commission grants NFGD's recommended ROE, it would be an outlier relative to the average allowed ROE for gas utilities throughout the U.S.

[95] *Id.*

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes, it does. However, I reserve the right to supplement my testimony as new information becomes available.

APPENDIX A: CURRICULUM VITAE AND QUALIFICATIONS

Maureen L. Reno

Maureen Reno is a seasoned expert with 25 years of experience in the field of public utility regulation. After she completed her Ph.D. studies in Economics at the University of New Hampshire, Ms. Reno launched her career in public utility regulation as a utility analyst and program manager at the New Hampshire Public Utilities Commission, where she worked for the next 10 years. In this capacity, she provided expert testimony on rate of return (to include return on equity) in electricity, natural gas, and water utility rate cases. Ms. Reno also led the development and implementation of New Hampshire's Renewable Portfolio Standard program, helping both owners of distributed generation and load serving entities meet compliance requirements and maneuver the dynamic wholesale energy and renewable energy certificate markets. In addition, she managed New Hampshire's participation in the Regional Greenhouse Gas Initiative. Finally, Ms. Reno served as an expert witness on financial issues regarding the regulation of electric, natural gas, and water utilities, to include cost of capital and return on shareholder equity.

Subsequently, Ms. Reno served as a Senior Energy Economist with the Union of Concerned Scientists. In this capacity, she developed clean energy financing policies and advocated for electricity sector solutions to global warming.

Since 2012, Ms. Reno has served as an independent consultant, working with other small businesses to advise government and industry clients on diverse utility-related matters. In addition, she has served as an expert witness on rate design and rate of return (to include return on equity) in numerous cases. Her testimony has been presented to public utility commissions across the United States, to include the Regulatory Commission of Alaska, Arizona Corporation Commission, California Public Utilities Commission, Delaware Public Service Commission, Georgia Public Service Commission, Hawaii Public Utilities Commission, Kansas Corporation Commission, Missouri Public Service Commission, New Hampshire Public Utilities Commission, New Mexico Public Regulation Commission, North Carolina Utilities Commission, North Dakota Public Service Commission, Oklahoma Corporation Commission, Pennsylvania Public Utility Commission, South Carolina Public Service Commission, and Public Utility Commission of Texas. Ms. Reno's testimony has been consistently accepted by public utility commissions.

Ms. Reno stays abreast of the latest developments in utility regulatory law and policy through her research and professional activities. Given the complexity of Federal and state regulations that affect her clients, Ms. Reno dedicates significant time and energy to reviewing regulatory developments enacted by the U.S. Department of Energy, the Federal Energy Regulatory Commission (FERC), and the U.S. Environmental Protection Agency.

EDUCATION

- Completed all course work and exam requirements towards the Doctorate of Philosophy in Economics – University of New Hampshire, Durham.
  Fields of Specialization: Industrial Organization and Environmental Economics
- Master of Arts in Economics – University of New Hampshire, Durham, 1998
- Bachelor of Arts in Economics – University of Maine, Orono, 1996

PROFESSIONAL EXPERIENCE

- Independent Consultant and Principal, Reno Energy Consulting Services, LLC (2016-Present)
- Rates and Market Policy Director, New Hampshire Office of the Consumer Advocate (2021-2022)
- Independent Consultant (2012-2016)
- Senior Energy Economist, Union of Concerned Scientists (2011-2012)
- Analyst, Program Manager, Utility Analyst, and Economist, New Hampshire Public Utilities Commission (2001-2011)
- Survey Manager, New Hampshire Small Business Development Center (1999-2001)
- Adjunct Instructor, University of New Hampshire (1999-2001)

PROFESSIONAL WORK

As an independent consultant (as a prime contractor with Reno Energy Consulting Services, LLC and subcontractor under Exeter Associates, TAHOEconomics, and Nordee Enterprise LLC), Ms. Reno:

- Reviewed, analyzed, and prepared oral and written testimony in electric, natural gas, and water utility rate cases on topics that include rate design (revenue decoupling mechanisms); rate of return (including return on equity, capital structure, and accounting adjustments), and mergers and acquisitions.

- Worked with solar power installer to assess return on investment and payback period for investments in energy storage that included analyzing customer load profiles, utility tariffs, tax credits, and potential revenues from wholesale markets and state programs.

- Prepared report that included assessment of electricity options and projected revenues and costs for the Army & Air Force Exchange Service's West Coast Distribution Center, which included analyzing Pacific Gas & Electric Company's tariffs and potential revenues from wholesale markets for investments in solar power and energy storage.

As the Rates and Market Policy Director at the New Hampshire Office of the Consumer Advocate, Ms. Reno:

- Reviewed and analyzed utility filings and prepared written recommendations in two natural gas utility proceedings pertaining to a revenue decoupling adjustment mechanism and a renewable natural gas contract.

- Reviewed and analyzed utility filings and provided oral testimony in an electric utility's electric vehicle make-ready program and proposed tariff rates.

- Reviewed, analyzed and prepared oral and written recommendations for the Consumer Advocate on utility requests for changes in energy service rate charges (electric default service and cost of gas) and other surcharges reflected in utility company tariffs.

As an independent consultant for Exeter Associates Inc., Ms. Reno:

- Preparing the financial analysis and ratepayer impacts of a long-term contract requirement under Maryland's RPS for the Power Plant Research Program (PPRP) on behalf of the Maryland Department of Natural Resources.

  Evaluated utility proposals for deployment, cost-benefit analysis, and cost recovery of Maryland's Statewide Electric Vehicle Portfolio on behalf of the Maryland Energy Administration through the PPRP in Case No. 9478 In the Matter of the Petition of the Electric Vehicle Work Group for Implementation of a Statewide Electric Vehicle Portfolio.

- Conducted research and drafted sections of regional energy market operations manuals for the US Department of Energy's Federal Energy Management Program. The reports focused on how federal facilities were pursuing renewable energy development under the different market constructs, such as by vertically integrated electric utilities, electric utilities with the PJM footprint, and electric utilities in California, and how those market constructs affected the prospects for future renewable energy development.

As an independent consultant for TAHOEconomics LLC, Ms. Reno:

- Provided written and oral testimony and legal briefs on behalf of the City of Clovis, New Mexico, in a water utility rate cases before the New Mexico Public Regulation Commission. Assessed EPCOR Water New Mexico Inc.'s weighted average cost of capital and estimated the rate of return on equity using discounted cash flow, risk premium, and capital asset pricing models.

As an independent consultant for Stephenson Strategic Communications, LLC, Ms. Reno:

- Provided consulting services to build support in New Hampshire for strong national climate and energy policies on behalf of a nationally recognized, non-profit environmental organization.
- Mobilized experts and leaders in New Hampshire to engage elected federal, state and local officials through targeted Senator visits, media interviews, public events, letters to the editor, and opinion and editorial articles.
- Communicated directly with targeted legislators and their staff to determine their positions on climate and clean air policies and address their concerns.

As an independent consultant for TrueLight Energy, LLC, Ms. Reno:

- Acted as director of regulatory affairs to expand upon current services to provide clients with guidance on how to navigate the dynamic deregulated electricity industry.
- Developed regulatory service product for clients, which includes ISO/utility tariff tracking and rate impact analysis, policy analysis, new market identification and participation in regulatory processes.
- Identified and originated new commercial opportunities in the U.S. to support principle product/service lines: retail supplier solutions; generation asset management; and sustainability management solutions for large energy users.
- Developed and implemented business development and business-to-business marketing strategies in coordination with senior management.

As a senior economist at the Union of Concerned Scientists, Ms. Reno:

- Promoted the development of clean energy technologies and policies in the electricity sector. Designed and evaluated energy policies at the state, regional, and national levels to maximize economic benefits and overcome market barriers to renewable energy.
- Evaluated and developed alternative financial policies to national and state renewable energy standards. Completed internal documents and research focusing on master limited partnerships and real estate investment trusts as possible sources of financing capital for renewable energy projects.
- Informed and enhanced coalition strategies by evaluating and developing appropriate responses to federal policy opportunities, including a low-carbon electricity standard, production tax credit, and other emerging opportunities.

- Evaluated the net benefits and opportunities for economic development in renewable energy manufacturing and the supply chain.

As an analyst and program manager at the New Hampshire Public Utilities Commission, Ms. Reno:

- Developed and managed New Hampshire's RPS Program.
- Developed internal protocols for managing New Hampshire's RPS program pursuant to PUC's RPS program rules (N.H. Code of Administrative Rules PUC 2500), including designing resource eligibility application forms.
- Verified electricity providers' compliance with New Hampshire's RPS program and processed applications for renewable energy source eligibility.
- Prepared and submitted annual RPS compliance reports, including program evaluation and policy analysis, to the State legislature on behalf of the PUC.
- Monitored and forecasted renewable energy certificate market trends in New England and New Hampshire to estimate available revenues supporting rebate programs.
- Maintained an RPS program website and renewable energy sources database.
- Participated in various regional working groups, including the RGGI Allowance and Offset Market Groups, and the GIS Regulators' Caucus to develop and maintain the NEPOOL GIS Operating Rules.
- Developed Greenhouse Gas Emissions Reduction Fund Cost Effectiveness Analysis model for request for proposal applicants.

As a utility analyst and economist at the New Hampshire Public Utilities Commission, Ms. Reno:

- Reviewed, analyzed and prepared oral and written recommendations in eight electric, natural gas and water utility rate cases in which she calculated each company's weighted average cost of capital and estimated the rate of return on equity using discounted cash flow, risk premium, and capital asset pricing models.
- Advised the PUC on utilities' debt financings, bond issuances, power plant retrofit, advanced/net metering, demand response, environmental disclosure, and incentives for in-state energy efficiency programs.
- Collaborated on behalf of the PUC with public and private entities to write New Hampshire's RPS law (HB 873), state participation in RGGI (HB 1434) and the PUC's RPS program rules (N.H. Code of Administrative Rules Puc 2500).

- Advised the Commissioners on the development of the RGGI carbon dioxide emission limits and the Allowance Auction Market.

- Prepared fiscal impact statements regarding proposed legislation and regulations in the State of New Hampshire using cost-benefit analysis.

As a Survey Manager for the New Hampshire Small Business Development Center, Ms. Reno:

- Designed and distributed a survey to collect data on the characteristics of New Hampshire manufacturers.

- Managed collection of survey data, designed a database for the data collected and oversaw data entry efforts.

- Analyzed the economic and behavioral factors that lead to the growth of New Hampshire manufacturing companies using multivariate regression, factor and cluster analysis of survey data.

As an Adjunct Instructor for the University of New Hampshire, Ms. Reno:

- Taught undergraduate courses in Principles of Macroeconomics and Microeconomics, including lectured on a daily basis, and developed lesson plans and teaching materials.
- Managed teaching assistant's work correcting and grading testing materials and writing assignments.

UTILITY LITIGATION

State	Client	Citation/Utility	Industry	Provided Testimony on the following Topic:	Type of Testimony Provided
Arizona	U.S. Department of Defense (DoD)	E-01933A-25-0103/Tucson Electric Power Company	Electric	Cost of Capital and Return on Equity	Written
Delaware	Public Service Commission Staff (PSC Staff)	25-0346/Artesian Water Company, Inc.	Water	Cost of Capital and Return on Equity	Written
Rhode Island	Division of Public Utilities and Carriers	25-30-WW/Veolia Water Rhode Island, Inc.	Water	Cost of Capital and Return on Equity	Written
Texas	DoD	58306/Oncor Electric Delivery Company	Electric	Cost of Capital and Return on Equity	Written
New Mexico	Bernalillo County (BC)	25-00049-UT/Public Service Company of New Mexico	Electric	Grid Modernization Annual Report	Written
Hawaii	Division of Consumer Advocacy	2025-0172/Princeville Utilities Co., Inc.	Water, Waste Water	Cost of Capital and Return on Equity	Written
California	Small Business Utility Advocates (SBUA)	25-03-010/Pacific Gas and Electric Company	Electric	Cost of Capital and Return on Equity	Written
Delaware	PSC Staff	24-1044/Delmarva Power & Light	Natural Gas	Cost of Capital and Return on Equity	Written

North Dakota	Public Service Commission Advocacy Staff	PU-24-376/Northern States Power Company	Electric	Cost of Capital and Return on Equity	Written
Texas	DoD	57568/El Paso Electric Co.	Electric	Cost of Capital and Return on Equity	Written & Oral
New Mexico	New Mexico Department of Justice (DOJ)	25-00027-UT/ Southwestern Public Service Company	Electric	Recovery of Solar Power Generation Assets in Renewable Portfolio Standard Rider	Written & Oral
New Mexico	DOJ	24-00270-UT/ Southwestern Public Service Company	Electric	Recovery of Production and Investment Tax Credits through Fuel Adjustment Clause	Written & Oral
Alaska	DoD	U-24-030/U-24-031/ Golden Heart Utilities, Inc. and College Utilities Corporation	Water, Waste Water	Cost of Capital and Return on Equity	Written
Pennsylvania	Office of Consumer Advocate (PA OCA)	R-2024-3052359/Pike County Light & Power Co.	Electric	Cost of Capital and Return on Equity	Written
Pennsylvania	PA OCA	R-2024-3052357/Pike County Light & Power Co.	Natural Gas	Cost of Capital and Return on Equity	Written
New Mexico	BC	24-00089-UT/Public Service Co. of New Mexico	Electric	Cost of Capital and Return on Equity	Written & Oral

South Carolina	DoD	2024-34-E/Dominion Energy South Carolina, Inc.	Electric	Cost of Capital and Return on Equity	Written
New Mexico	BC	22-00058-UT/ Public Service Co. of New Mexico	Electric	Grid Modernization Cost-Benefit Analysis	Written & Oral
Delaware	PSC Staff	23-0601/Artesian Water Company, Inc.	Water	Cost of Capital and Return on Equity	Written
New Mexico	U.S. Department of Energy (DOE)	23-00255-UT/New Mexico Gas Company. Inc.	Natural Gas	Cost of Capital and Return on Equity	Written & Oral
California	SBUA	23-01-008/San Diego Gas & Electric Company	Electric	Rate Design & Cost of Service	Written
Kansas	DoD	23-EKCE-775-RTS/Evergy Kansas Central, Inc. & Evergy Kansas Metro,	Electric	Cost of Capital and Return on Equity	Written
Delaware	PSC Staff	22-0897/Delaware Power & Light	Electric	Cost of Capital and Return on Equity	Written & Oral
Texas	DOE	54634/Southwestern Public Service Company	Electric	Cost of Capital, Return on Equity, and Rate Design Impacts on Risk	Written
New Mexico	BC	22-00270-UT/ Public Service Co. of New Mexico	Electric	Cost of Capital, Return on Equity, and Rate Design Impacts on Risk	Written & Oral
North Carolina	DoD	E-2, SUB 1300/ Duke Energy Progress, LLC	Electric	Cost of Capital, Return on Equity, and Rate Design Impacts on Risk	Written

Georgia	DoD	44280/ Georgia Power Company	Electric	Cost of Capital, Return on Equity, and Rate Design Impacts on Risk	Written & Oral
Texas	DoD	53601/ Oncor Electric Delivery Company	Electric	Cost of Capital and Return on Equity	Written & Oral
New Hampshire	Office of the Consumer Advocate (NH OCA)	DE 21-078/ Eversource	Electric	Electric Vehicle Make-Ready and Demand Charge Alternative	Oral
Alaska	DoD	U-21-070/U-21-071/ Golden Heart Utilities, Inc. and College Utilities Corporation	Water, Waste Water	Cost of Capital and Return on Equity	Written
New Hampshire	NH OCA	DG 21-104/ Northern Utilities, Inc.	Natural Gas	Rate Design: Revenue Decoupling Adjustment Mechanism and Impacts on Risk	Written & Oral
New Hampshire	NH OCA	DG 21-036/ Liberty Utilities	Natural Gas	Cost-Effectiveness of a Renewable NG Supply Agreement	Written
Texas	DoD	52195/ El Paso Electric Company	Electric	Cost of Capital and Return on Equity	Written & Oral
New Mexico	BC	20-00222-UT/ Public Service Co. of New Mexico	Electric	Mergers & Acquisitions: Benefits and Risks	Written & Oral
New Mexico	BC	20-00121-UT/ Public Service Co. of New Mexico	Electric	Rate Design: Decoupling Mechanism	Written & Oral

New Mexico	Public Regulation Commission Staff	19-00170-UT/ Southwestern Public Service Company	Electric	Cost of Capital and Return on Equity	Written
Georgia	DoD	42516/ Georgia Power Company	Electric	Cost of Capital, Return on Equity, and Rate Design Impacts on Risk	Written & Oral
Arizona	DoD	E-01933A-19-0028/ Tucson Electric Power Company	Electric	Cost of Capital and Return on Equity	Written & Oral
New Mexico	City of Clovis, NM	18-00124-UT/ EPCOR Water New Mexico Inc.	Water	Cost of Capital and Return on Equity	Written & Oral
Oklahoma	DoD	PUD 201700151/ Public Service Co. of Oklahoma	Electric	Cost of Capital and Return on Equity	Written & Oral
Oklahoma	DoD	PUD 201500208/ Public Service Co. of Oklahoma	Electric	Cost of Capital, Return on Equity, and Rate Design Impacts on Risk	Written & Oral
Texas	DOE	43695/ Southwestern Public Service Company	Electric	Cost of Capital and Return on Equity	Written & Oral
Missouri	DOE	ER-2014-0370/ Kansas City Power & Light Co.	Electric	Cost of Capital and Return on Equity	Written & Oral
Texas	DOE	41791/ Entergy Texas, Inc.	Electric	Cost of Capital and Return on Equity	Written
New Hampshire	Public Utilities Commission (PUC)	DE 05-178/ Unitil Energy Systems, Inc.	Electric	Cost of Capital and Return on Equity	Written

New Hampshire	PUC	DE 04-177/ Public Service Co. of New Hampshire (generation assets)	Electric	Cost of Capital and Return on Equity	Written & Oral
New Hampshire	PUC	DW 04-056/ Pennichuck Water Works, Inc.	Water	Cost of Capital and Return on Equity	Written
New Hampshire	PUC	DE 03-200/ Public Service Co. of New Hampshire	Electric	Cost of Capital and Return on Equity	Written & Oral
New Hampshire	PUC	DE 03-166/ Public Service Co. of New Hampshire	Electric	Financial Incentives Associated with a Power Plant Retrofit from Coal to Biomass	Written & Oral
New Hampshire	PUC	DE 01-247/ Concord Electric Co. and Exeter & Hampton Electric Co.	Electric	Cost of Capital and Return on Equity	Written
New Hampshire	PUC	DE 01-168/ Public Service Co. of New Hampshire	Electric	Refinancing of Long-term Debt, Short-term Debt Limit, and Utilization of Derivative Instruments	Written & Oral
New Hampshire	PUC	DG 01-182/ Northern Utilities, Inc.	Natural Gas	Cost of Capital and Return on Equity	Written & Oral
New Hampshire	PUC	DW 01-081/ Pennichuck Water Works, Inc.	Water	Cost of Capital and Return on Equity	Written

UTILITY-RELATED MATTERS

State	Client	Description of Tasks
New Mexico	Bernalillo County	Provided Comments regarding incorporating Cost-Benefit Analyses and related modifications to Grid Modernization Rule, Title 17, Chapter 9, in a new Part 587 in Docket No. 22-00089-UT.
New Jersey	Division of the Rate Counsel	Provided comments on Jersey Central Power & Light Co. request for authority to issue and sell up to $1.7 billion in senior notes in Docket No. EF025030121.
New Jersey	Division of the Rate Counsel	Provided comments on Jersey Central Power & Light Co. request to participate in FirstEnergy Money Pool Docket No. EF02030185.
New Jersey	Division of the Rate Counsel	Provided cost of capital and return on equity to client for settlement purposes in Jersey Central Power & Light EnergizeNJ case EO-23110793.
California	Small Business Utility Advocates	Provided comments on utility draft annual reports concerning California's RPS Rulemaking Cases No. R.18-07-003 and R.24-01-017.
New Hampshire & Massachusetts	Nordee Enterprise LLC	Worked with a solar power installer to assess return on investment and payback period for investments in energy storage that included analyzing customer load profiles, utility tariffs, tax credits, and potential revenues from wholesale markets and state programs.
New Hampshire	Office of the Consumer Advocate (NH OCA)	Negotiated settlement terms in DE 21-119 Eversource Energy's Proposed Tariff Amendment to Residential Time-of-Day Rate.
New Hampshire	NH OCA	Negotiated settlement terms in DE 20-170 Electric Distribution Utilities' Electric Vehicle Time of Use Rates.
Federal	Army & Air Force Exchange Service (AAFES)	Prepared report that included assessment of electricity options and projected revenues and costs for AAFES' West Coast Distribution Center, which included analyzing Pacific Gas & Electric Company's tariffs and potential revenues from wholesale markets for investments in solar power and energy storage.
New Hampshire	NH OCA	Evaluated utility proposal and ratepayer impacts of Liberty Utilities cost of gas proposal in DG 21-130 (EnergyNorth Natural Gas) and DG 21-132 (Liberty-

		Keene Division).
New Hampshire	NH OCA	Evaluated Liberty Utilities' Firm Transportation Agreement with Tennessee Gas Pipeline Company LLC in DG 21-008.
Maryland	Department of Natural Resources (DNR)	Prepared the financial analysis and ratepayer impacts of a long-term contract requirement under Maryland's RPS. The report titled "Final Report Concerning the Maryland Renewable Portfolio Standard as Required by Chapter 393 of the Acts of the Maryland General Assembly of 2017" was publicly released in December 2019.
Maryland	Energy Administration (EA)	Evaluated utility proposals for deployment, cost-benefit analysis, and cost recovery of Maryland's Statewide Electric Vehicle Portfolio in Case No. 9478 In the Matter of the Petition of the Electric Vehicle Work Group for Implementation of a Statewide Electric Vehicle Portfolio.
Federal	US Department of Energy (DOE)	Conducted research and drafted sections of regional energy market operations manuals for the US Department of Energy's Federal Energy Management Program. The reports focused on how federal facilities were pursuing renewable energy development under different market constructs, such as by vertically integrated electric utilities, electric utilities with the PJM footprint, and electric utilities in California.
New Hampshire	Derry Town Council	Oversaw the town energy committee's involvement in various energy cost saving projects or initiatives, such as installing a large solar array on the town's landfill, updating streetlights with LED fixtures, building a new transfer station that meets LEED certification, installing an electric vehicle charging station downtown, and hosting/managing resident participation in two Solar Up campaigns.
New Hampshire	Derry Town Council	Advised town council on establishing the Derry Net Zero Task Force and town goal of becoming Net Zero by 2025.
Massachusetts	Union of Concerned Scientists (UCS)	Evaluated and developed alternative financial policies to national and state renewable energy standards. Completed internal documents and research focusing on master limited partnerships and real estate investment trusts as possible sources of financing capital for renewable energy projects.

Massachusetts	UCS	Conducted manufacturing supply chain analysis of wind power systems
New Hampshire	Public Utilities Commission (PUC)	Developed internal protocols for managing New Hampshire's RPS program pursuant to NHPUC's RPS program rules (N.H. Code of Administrative Rules PUC 2500), including designing resource eligibility application forms.
New Hampshire	PUC	Verified electricity providers' compliance with New Hampshire's RPS program and processed applications for renewable energy source eligibility.
New Hampshire	PUC	Prepared and submitted annual RPS compliance reports to the State legislature on behalf of the NHPUC.
New Hampshire	PUC	Developed Greenhouse Gas Emissions Reduction Fund Cost Effectiveness Analysis model for grant proposals.
New Hampshire	PUC	Collaborated on behalf of the NHPUC with public and private entities to write New Hampshire's RPS law (HB 873), law concerning state participation in Regional Greenhouse Gas Initiative (RGGI) (HB 1434) and the NHPUC's RPS program rules (N.H. Code of Administrative Rules Puc 2500).
New Hampshire	PUC	Advised the Commissioners on the development of the RGGI carbon dioxide emission limits and the RGGI Allowance Auction Market.
New Hampshire	PUC	Assisted researchers at the University of New Hampshire in estimating the net benefits of New Hampshire's RPS and its participation in RGGI for the state legislature.

Schedule MLR-1 - Historical Economic Trends (Percent Change from Previous Period)							
	2019	**2020**	**2021**	**2022**	**2023**	**2024**	**2025**
Real GDP	2.6	-2.1	6.2	2.5	2.9	2.8	2.2
GDP Price Index	1.7	1.4	4.5	7.1	3.7	2.5	2.8
Consumer Price Index	1.8	1.2	4.7	8.0	4.1	2.9	2.6
Personal Consumption Expenditures	1.4	1.1	4.1	6.5	3.8	2.6	2.6
Core Personal Consumption Exp.	1.6	1.4	3.6	5.3	4.2	2.9	2.8
Unemployment Rate	3.7	8.1	5.3	3.6	3.6	4.0	4.3
Employment/Population Ratio	60.8	56.8	58.4	60.0	60.3	60.1	59.7
Labor Force Participation Rate	63.1	61.7	61.7	62.2	62.6	62.6	62.4

Source: Economic Indicators, Prepared for the Joint Economic Committee by the Council of Economic Advisors, February 2026, at 3, 11, and 24.

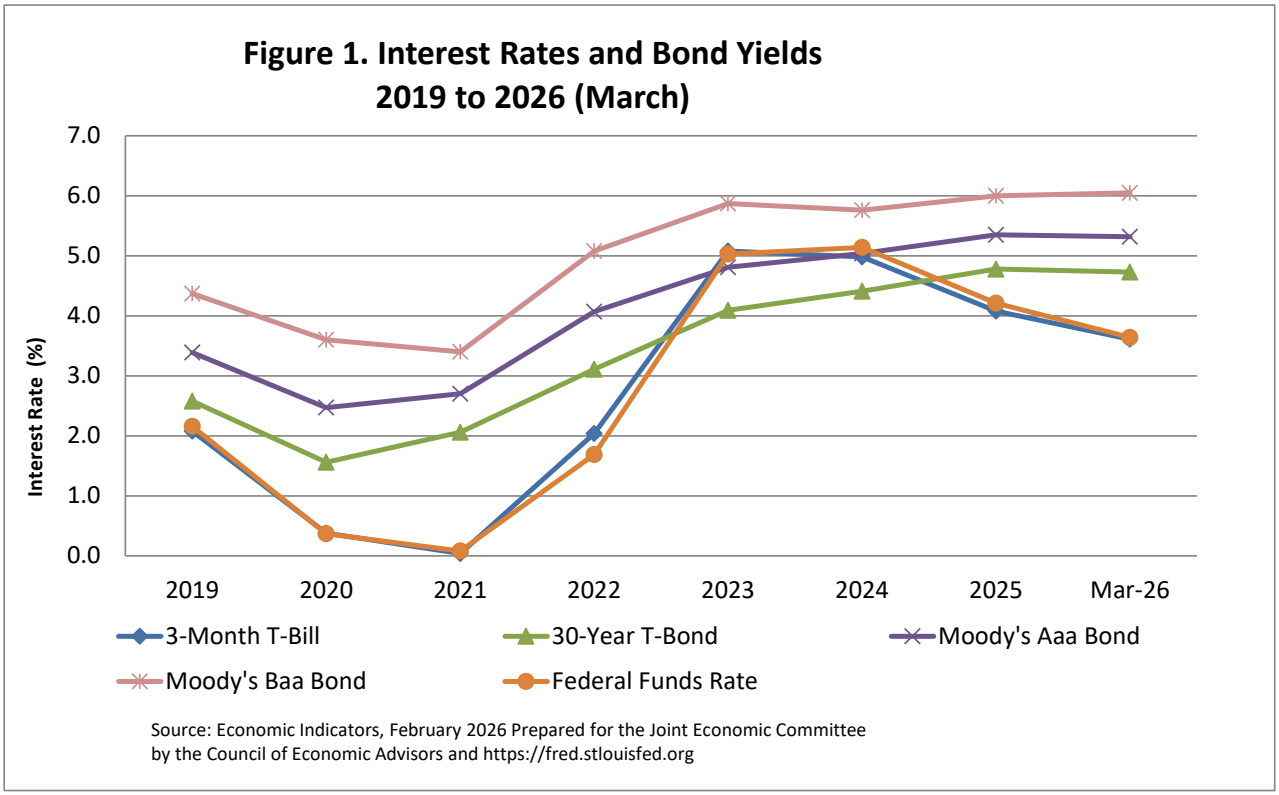
Core personal consumption expenditures shows expenditures minus food and energy.

Schedule MLR-2a - Interest Rates and Bond Yields (2019 to March 2026)								
	2019	2020	2021	2022	2023	2024	2025	Mar-26
3-Month T-Bill	2.08	0.38	0.04	2.04	5.08	4.98	4.08	3.61
10-Year T-Bond	2.14	0.89	1.45	2.95	3.96	4.21	4.29	4.10
30-Year T-Bond	2.58	1.56	2.06	3.11	4.09	4.41	4.78	4.73
Moody's Aaa Bond	3.39	2.47	2.70	4.07	4.81	5.04	5.35	5.32
Moody's Baa Bond	4.37	3.60	3.40	5.08	5.87	5.76	6.00	6.05
Prime Interest Rate	5.28	3.54	3.25	4.86	8.20	8.31	7.37	6.75
Federal Funds Rate	2.16	0.37	0.08	1.69	5.03	5.14	4.21	3.64

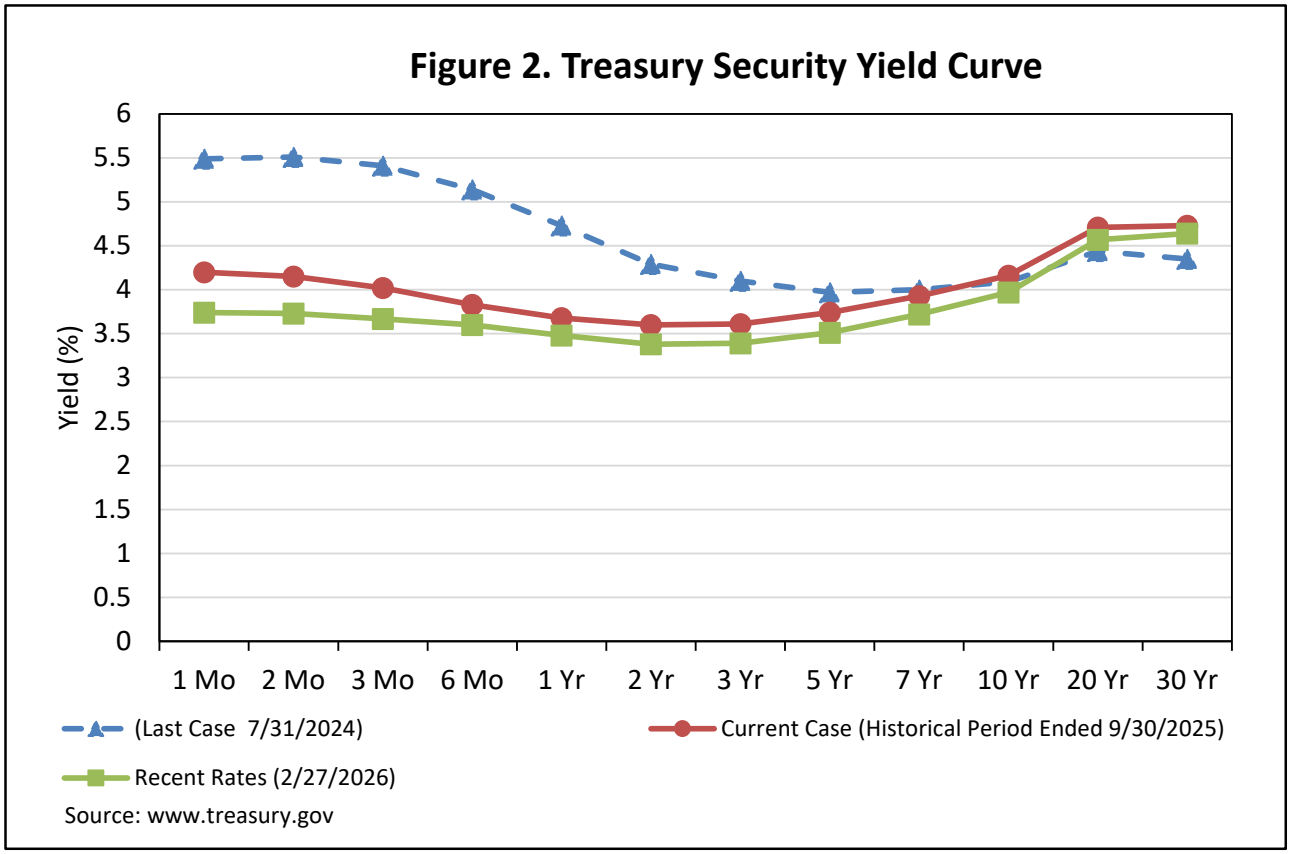
Source: Economic Indicators, February 2026, Prepared for the Joint Economic Committee by the Council of Economic Advisors at 30.

Moody's Baa-rated Corporate Bond Rates Source: https://fred.stlouisfed.org

Annual data reflects averages and March data shows rate in effect at Wednesday for the week of March 7, 2026.



Schedule MLR-2b - Daily Yields on Treasury Securities (%)			
	(Last Case 7/31/2024)	Current Case (Historical Period Ended 9/30/2025)	Recent Rates (2/27/2026)
1 Mo	5.49	4.2	3.74
2 Mo	5.51	4.15	3.73
3 Mo	5.41	4.02	3.67
6 Mo	5.14	3.83	3.6
1 Yr	4.73	3.68	3.48
2 Yr	4.29	3.6	3.38
3 Yr	4.1	3.61	3.39
5 Yr	3.97	3.74	3.51
7 Yr	4	3.93	3.72
10 Yr	4.09	4.16	3.97
20 Yr	4.44	4.71	4.57
30 Yr	4.35	4.73	4.64



Schedule MLR-2c - Daily Average TIPS Spread			
Date	Yield on 30-yr T-Bond	Yield on 30-yr T-Bond (Inflation Indexed)	30-Day TIPs Spread
12/1/2025	4.74	2.53	2.21
12/2/2025	4.74	2.53	2.21
12/3/2025	4.73	2.52	2.21
12/4/2025	4.76	2.54	2.22
12/5/2025	4.79	2.57	2.22
12/8/2025	4.81	2.58	2.23
12/9/2025	4.8	2.58	2.22
12/10/2025	4.78	2.55	2.23
12/11/2025	4.79	2.57	2.22
12/12/2025	4.85	2.61	2.24
12/15/2025	4.84	2.61	2.23
12/16/2025	4.82	2.6	2.22
12/17/2025	4.83	2.61	2.22
12/18/2025	4.8	2.58	2.22
12/19/2025	4.82	2.61	2.21
12/22/2025	4.84	2.63	2.21
12/23/2025	4.83	2.61	2.22
12/24/2025	4.79	2.58	2.21
12/26/2025	4.81	2.6	2.21
12/29/2025	4.8	2.6	2.2
12/30/2025	4.81	2.6	2.21
12/31/2025	4.84	2.62	2.22
1/2/2026	4.86	2.63	2.23
1/5/2026	4.85	2.61	2.24
1/6/2026	4.86	2.62	2.24
1/7/2026	4.82	2.59	2.23
1/8/2026	4.85	2.62	2.23
1/9/2026	4.82	2.58	2.24
1/12/2026	4.83	2.59	2.24
1/13/2026	4.83	2.58	2.25
1/14/2026	4.79	2.56	2.23
1/15/2026	4.79	2.55	2.24
1/16/2026	4.83	2.58	2.25
1/20/2026	4.91	2.65	2.26
1/21/2026	4.87	2.6	2.27
1/22/2026	4.84	2.58	2.26
1/23/2026	4.82	2.56	2.26
1/26/2026	4.8	2.54	2.26
1/27/2026	4.83	2.56	2.27
1/28/2026	4.85	2.57	2.28
1/29/2026	4.85	2.58	2.27

1/30/2026	4.87	2.6	2.27
2/2/2026	4.9	2.63	2.27
2/3/2026	4.9	2.62	2.28
2/4/2026	4.91	2.63	2.28
2/5/2026	4.85	2.59	2.26
2/6/2026	4.85	2.58	2.27
2/9/2026	4.85	2.57	2.28
2/10/2026	4.78	2.53	2.25
2/11/2026	4.82	2.55	2.27
2/12/2026	4.72	2.48	2.24
2/13/2026	4.69	2.46	2.23
2/17/2026	4.68	2.47	2.21
2/18/2026	4.71	2.48	2.23
2/19/2026	4.7	2.47	2.23
2/20/2026	4.72	2.48	2.24
2/23/2026	4.7	2.49	2.21
2/24/2026	4.7	2.48	2.22
2/25/2026	4.7	2.47	2.23
2/26/2026	4.67	2.44	2.23
2/27/2026	4.64	2.43	2.21
30-Day Average	**4.76**	**2.52**	**2.24**
90-Day Average	**4.80**	**2.56**	**2.24**

https://www.federalreserve.gov/releases/h15/

Schedule MLR-3 - Survey of Professional Forecasters (U.S. Quarterly and Annual Forecasts)									
	Percent (%) Growth at Annual Rates								
	Quarterly					Year-Over-Year			
	Q1 2026	Q2 2026	Q3 2026	Q4 2026	Q1 2027	2026	2027	2028	2029
Real Gross Domestic Product ("GDP")	2.60	2.10	2.30	2.00	2.20	2.50	2.10	2.10	1.90
Nominal GDP	5.50	4.60	4.70	5.00	4.50	5.40	4.40	N.A.	N.A.
GDP Price Index	2.70	2.50	2.70	2.60	2.40	2.90	2.40	N.A.	N.A.
Consumer Price Index ("CPI")	2.70	2.70	2.60	2.50	2.40	2.60	2.50	2.40	N.A.
CORE CPI	2.80	2.80	2.60	2.50	2.50	2.60	2.50	2.40	N.A.
Personal Consumption Expenditure ("PCE")	2.90	2.70	2.50	2.50	2.40	2.70	2.30	2.20	N.A.
CORE PCE	2.90	2.70	2.50	2.40	2.40	2.70	2.30	2.10	N.A.
Unemployment Rate	4.40	4.50	4.50	4.50	4.40	4.50	4.40	4.40	4.40
3-Month Treasury Bill	3.65	3.55	3.39	3.17	3.10	3.44	3.00	2.94	2.99
10-Year Treasury Bond	4.10	4.09	4.03	4.00	3.97	4.07	3.99	3.94	3.99
Moody's AAA Corp. Bond	5.28	5.24	5.18	5.15	5.10	5.21	5.05	N.A.	N.A.
Moody's BAA Corp. Bond	5.86	5.90	5.86	5.81	5.84	5.86	5.83	N.A.	N.A.

Source: Research Department, Federal Reserve Bank of Philadelphia, Survey of Professional Forecasters, First Quarter 2026, March 6, 2026, at 9 and 11.

Note: The figures above represent medians of 37 forecasters.

Schedule MLR-4 - Sample Characteristics					
Proxy Group	**VL Beta (1.00 = Market)**	**S&P Credit Rating**	**Moody's Credit Rating**	**Common Equity Ratio (2026)**	**Long-Term Debt Ratio (2026)**
Atmos Energy Corp	0.80	A-	A2	60.00	40.00
New Jersey Resources Corp	0.75	NR	A1	43.50	56.50
Nisource Inc	0.85	BBB+	Baa2	45.00	55.00
Northwest Natural	0.80	A-	NR	45.00	55.00
ONE Gas Inc.	0.75	A-	A3	57.00	43.00
Southwest Gas	0.80	BBB-	Baa2	45.00	55.00
Spire Inc.	0.75	BBB+	Baa2	40.50	56.50
Sample Average	**0.79**	**BBB+**	**Baa1**	**48.00**	**51.57**
Sample Median	**0.80**	**BBB+**	**Baa1**	**45.00**	**55.00**

Source: Value Line Investment Survey, Issue 3 (Natural Gas Utility), February 20, 2026.

Credit Ratings as of April 3, 2026; reporterd by S&P Global Market Intelligence.

Schedule MLR-5a - Constant Growth DCF Results, EPS Growth Method (30-Stock Price)									
Proxy Group	**30-Day Stock Price Ave., P0**	**DPS (2026), D0**	**Current Div Yield, D0/P0**	**Expected Div Yield, D0/P0*(1+0.5g)**	**S&P Expected EPS Growth Next 5 yrs[1]**	**Zacks Expected EPS Growth Next 5 yrs[2]**	**VL Expected EPS Growth**	**Average Expected Earnings Growth Rate, g**	**1St DCF w/Earnings Growth, (D1/P0)+g**
Atmos Energy Corp	175.98	4.00	2.27	2.36	8.21	7.00	8.00	7.74	10.10
New Jersey Resources Corp	52.57	1.90	3.61	3.74	8.55	NA	5.00	6.78	10.51
Nisource Inc	45.32	1.20	2.65	2.75	8.64	6.00	7.50	7.38	10.13
Northwest Natural	49.07	1.97	4.02	4.14	6.67	NA	6.00	6.34	10.48
ONE Gas Inc.	83.68	2.72	3.25	3.36	6.90	8.10	6.00	7.00	10.36
Southwest Gas	85.54	2.48	2.90	3.05	12.01	9.20	-	10.61	13.66
Spire Inc.	88.22	3.30	3.74	3.92	8.40	12.00	8.50	9.63	13.55
Sample Average	**82.91**	**2.51**	**3.21**	**3.33**	**8.48**	**8.46**	**6.83**	**7.92**	**11.26**
Sample Median									**10.48**

Source: Value Line Investment Survey, Issue 3 (Natural Gas Utility), February 20, 2026.

Schedule MLR-5b - Constant Growth DCF Results, Expected EPS, DPS and BVPS Growth Method (30-Day Stock Price)									
Proxy Group	**30-Day Stock Price Ave., P0**	**DPS (2026), D0**	**Current Div Yield, D0/P0**	**Expected Div Yield, D0/P0*(1+0.5g)**	**Average Expected Earnings Growth Rate, g[1]**	**VL Expected DPS Growth**	**VL Expected BVPS Growth**	**Average Expected Growth Rate (EPS, DPS, BVPS), g**	**1st DCF using EPS, DPS, BV Growth Rates, (D1/P0)+g**
Atmos Energy Corp	175.98	4.00	2.27	2.36	7.74	8.00	6.00	7.25	9.60
New Jersey Resources Corp	52.57	1.90	3.61	3.73	6.78	6.00	6.00	6.26	9.99
Nisource Inc	45.32	1.20	2.65	2.75	7.38	6.00	9.50	7.63	10.38
Northwest Natural	49.07	1.97	4.02	4.07	6.34	0.50	2.00	2.95	7.02
ONE Gas Inc.	83.68	2.72	3.25	3.31	7.00	2.00	1.50	3.50	6.81
Southwest Gas	85.54	2.48	2.90	2.98	10.61	1.50	4.50	5.54	8.51
Spire Inc.	88.22	3.30	3.74	3.84	9.63	5.00	0.50	5.04	8.88
Sample Average	**82.91**	**2.51**	**3.21**	**3.29**	**7.92**	**4.14**	**4.29**	**5.45**	**8.74**
Sample Median									**8.88**

Source: Value Line Investment Survey, Issue 3 (Natural Gas Utility), February 20, 2026.

1. Average Expected EPS Growth from Schedule MLR-5a.

Schedule MLR-5c - Constant Growth DCF Results, EPS Growth Method (90-Day Stock Price)									
Proxy Group	**90-Day Stock Price Ave., P0**	**DPS (2026), D0**	**Current Div Yield, D0/P0**	**Expected Div Yield, D0/P0*(1+0.5g)**	**S&P Expected EPS Growth Next 5 yrs[1]**	**Zacks Expected EPS Growth Next 5 yrs[2]**	**VL Expected EPS Growth**	**Average Expected Earnings Growth Rate, g**	**1St DCF w/Earnings Growth, (D1/P0)+g**
Atmos Energy Corp	170.94	4.00	2.34	2.43	8.21	7.00	8.00	7.74	10.17
New Jersey Resources Corp	48.69	1.90	3.90	4.03	8.55	NA	5.00	6.78	10.81
Nisource Inc	43.32	1.20	2.77	2.87	8.64	6.00	7.50	7.38	10.25
Northwest Natural	47.57	1.97	4.14	4.27	6.67	NA	6.00	6.34	10.61
ONE Gas Inc.	79.96	2.72	3.40	3.52	6.90	8.10	6.00	7.00	10.52
Southwest Gas	82.92	2.48	2.99	3.15	12.01	9.20	-	10.61	13.75
Spire Inc.	84.91	3.30	3.89	4.07	8.40	12.00	8.50	9.63	13.71
Sample Average	**79.76**	**2.51**	**3.35**	**3.48**	**8.48**	**8.46**	**6.83**	**7.92**	**11.40**
Sample Median									**10.61**

Source: Value Line Investment Survey, Issue 3 (Natural Gas Utility), February 20, 2026.

Schedule MLR-5d - Constant Growth DCF Results, Expected EPS, DPS and BVPS Growth Method (90-Day Stock Price)									
Proxy Group	**90-Day Stock Price Ave., P0**	**DPS (2026), D0**	**Current Div Yield, D0/P0**	**Expected Div Yield, D0/P0*(1+0.5g)**	**Average Expected Earnings Growth Rate, g[1]**	**VL Expected DPS Growth**	**VL Expected BVPS Growth**	**Average Expected Growth Rate (EPS, DPS, BVPS), g**	**1st DCF using EPS, DPS, BV Growth Rates, (D1/P0)+g**
Atmos Energy Corp	170.94	4.00	2.34	2.42	7.74	8.00	6.00	7.25	9.67
New Jersey Resources Corp	48.69	1.90	3.90	4.02	6.78	6.00	6.00	6.26	10.28
Nisource Inc	43.32	1.20	2.77	2.88	7.38	6.00	9.50	7.63	10.50
Northwest Natural	47.57	1.97	4.14	4.20	6.34	0.50	2.00	2.95	7.15
ONE Gas Inc.	79.96	2.72	3.40	3.46	7.00	2.00	1.50	3.50	6.96
Southwest Gas	82.92	2.48	2.99	3.07	10.61	1.50	4.50	5.54	8.61
Spire Inc.	84.91	3.30	3.89	3.98	9.63	5.00	0.50	5.04	9.03
Sample Average	**79.76**	**2.51**	**3.35**	**3.44**	**7.92**	**4.14**	**4.29**	**5.45**	**8.89**
Sample Median									**9.03**

Source: Value Line Investment Survey, Issue 3 (Natural Gas Utility), February 20, 2026.

1. Average Expected EPS Growth from Schedule MLR-5c.

Schedule MLR-6a - Sustainable Growth DCF (Internal Growth Component)											
Proxy Group	**Expected DPS (29-31)**	**Expected EPS (29-31)**	**BVPS (2026)**	**Expected BVPS (29-31)**	**Book Value Growth**	**Expected ROE = EPS/BVPS**	**Adjustment Factor**	**Adjusted ROE, r**	**Payout Ratio, DPS/EPS**	**Retention Rate, b**	**Internal Growth Rate, r*b**
Atmos Energy Corp	5.05	10.70	87.70	111.00	0.048	9.64	1.02	9.87	0.47	0.53	5.21
New Jersey Resources Corp	2.40	4.00	25.15	31.60	0.047	12.66	1.02	12.95	0.60	0.40	5.18
Nisource Inc	1.52	2.65	25.75	31.60	0.042	8.39	1.02	8.56	0.57	0.43	3.65
Northwest Natural	2.00	3.60	36.25	39.40	0.017	9.14	1.01	9.21	0.56	0.44	4.09
ONE Gas Inc.	2.95	6.00	54.55	53.55	-0.004	11.20	1.00	11.18	0.49	0.51	5.69
Southwest Gas	2.70	5.65	55.55	63.70	0.028	8.87	1.01	8.99	0.48	0.52	4.69
Spire Inc.	4.00	6.75	52.25	53.75	0.006	12.56	1.00	12.59	0.59	0.41	5.13
Sample Average	**2.95**	**5.62**	**48.17**	**54.94**	**0.03**	**10.35**	**1.01**	**10.48**	**0.54**	**0.46**	**4.81**
Sample Median											**5.13**

Source: Value Line Investment Survey, Issue 3 (Natural Gas Utility), February 20, 2026.

Schedule MLR-6b - Sustainable Growth DCF (External Growth Component)									
Proxy Group	**30-Day Stock Price Ave., P0**	**BVPS (2026)**	**Market-to-Book Ratio, P0/BVPS**	**Comm Shares Outstanding (mil) 2025**	**Expected Comm Shares Outstanding in 5yrs**	**Growth in # Shares**	**Expected Growth in # of shares, s**	**Expected Profit of stock investment, v**	**External Growth, s*v**
Atmos Energy Corp	175.98	87.70	2.01	161.57	200.00	4.36	8.75	0.50	4.39
New Jersey Resources Corp	52.57	25.15	2.09	100.48	105.00	0.88	1.85	0.52	0.96
Nisource Inc	45.32	25.75	1.76	478.40	525.00	1.88	3.30	0.43	1.43
Northwest Natural	49.07	36.25	1.35	42.00	50.00	3.55	4.80	0.26	1.25
ONE Gas Inc.	83.68	54.55	1.53	60.00	75.00	4.56	7.00	0.35	2.44
Southwest Gas	85.54	55.55	1.54	73.00	77.00	1.07	1.65	0.35	0.58
Spire Inc.	88.22	52.25	1.69	59.00	75.00	4.92	8.30	0.41	3.38
Sample Average	**82.91**	**48.17**	**1.71**	**139.21**	**158.14**	**3.03**	**5.09**	**0.40**	**2.06**
Sample Median									**1.43**

Source: Value Line Investment Survey, Issue 3 (Natural Gas Utility), February 20, 2026.

ScheduleMLR-6c - Sustainable Growth DCF (Results) (30-Day Stock Price)						
Proxy Group	**30-Day Stock Price Ave., P0**	**DPS (2026), D0**	**Current Div Yield, D0/P0**	**Expected Div Yield, D0/P0*(1+0.5g)**	**Sustainable Growth Rate, rb+sv[1]**	**Sustainable Growth DCF, (D1/P0)+rb+sv**
Atmos Energy Corp	175.98	4.00	2.27	2.38	9.60	11.98
New Jersey Resources Corp	52.57	1.90	3.61	3.73	6.14	9.87
Nisource Inc	45.32	1.20	2.65	2.72	5.08	7.79
Northwest Natural	49.07	1.97	4.02	4.12	5.35	9.47
ONE Gas Inc.	83.68	2.72	3.25	3.38	8.12	11.50
Southwest Gas	85.54	2.48	2.90	2.98	5.27	8.25
Spire Inc.	88.22	3.30	3.74	3.90	8.51	12.41
Sample Average	**82.91**	**2.51**	**3.21**	**3.31**	**6.87**	**10.18**
Sample Median						**9.87**

1. See Schedule MLR-6a for internal growth component, rb and Schedule MLR-6b for external growth component, sv.

Source: Value Line Investment Survey, Issue 3 (Natural Gas Utility), February 20, 2026.

Schedule MLR-6d - Sustainable Growth DCF (Internal Growth Component)											
Proxy Group	**Expected DPS (29-31)**	**Expected EPS (29-31)**	**BVPS (2026)**	**Expected BVPS (29-31)**	**Book Value Growth**	**Expected ROE = EPS/BVPS**	**Adjustment Factor**	**Adjusted ROE, r**	**Payout Ratio, DPS/EPS**	**Retention Rate, b**	**Internal Growth Rate, r*b**
Atmos Energy Corp	5.05	10.70	87.70	111.00	0.048	9.64	1.02	9.87	0.47	0.53	5.21
New Jersey Resources Corp	2.40	4.00	25.15	31.60	0.047	12.66	1.02	12.95	0.60	0.40	5.18
Nisource Inc	1.52	2.65	25.75	31.60	0.042	8.39	1.02	8.56	0.57	0.43	3.65
Northwest Natural	2.00	3.60	36.25	39.40	0.017	9.14	1.01	9.21	0.56	0.44	4.09
ONE Gas Inc.	2.95	6.00	54.55	53.55	-0.004	11.20	1.00	11.18	0.49	0.51	5.69
Southwest Gas	2.70	5.65	55.55	63.70	0.028	8.87	1.01	8.99	0.48	0.52	4.69
Spire Inc.	4.00	6.75	52.25	53.75	0.006	12.56	1.00	12.59	0.59	0.41	5.13
Sample Average	**2.95**	**5.62**	**48.17**	**54.94**	**0.03**	**10.35**	**1.01**	**10.48**	**0.54**	**0.46**	**4.81**
Sample Median											**5.13**

Source: Value Line Investment Survey, Issue 3 (Natural Gas Utility), February 20, 2026.

Schedule MLR-6e - Sustainable Growth DCF - External Growth Component									
Proxy Group	**90-Day Stock Price Ave., P0**	**BVPS (2026)**	**Market-to-Book Ratio, P0/BVPS**	**Comm Shares Outstanding (mil) 2025**	**Expected Comm Shares Outstanding in 5yrs**	**Growth in # Shares**	**Expected Growth in # of shares, s**	**Expected Profit of stock investment, v**	**External Growth, s*v**
Atmos Energy Corp	170.94	87.70	1.95	161.57	200.00	4.36	8.50	0.49	4.14
New Jersey Resources Corp	48.69	25.15	1.94	100.48	105.00	0.88	1.71	0.48	0.83
Nisource Inc	43.32	25.75	1.68	478.40	525.00	1.88	3.16	0.41	1.28
Northwest Natural	47.57	36.25	1.31	42.00	50.00	3.55	4.66	0.24	1.11
ONE Gas Inc.	79.96	54.55	1.47	60.00	75.00	4.56	6.69	0.32	2.13
Southwest Gas	82.92	55.55	1.49	73.00	77.00	1.07	1.60	0.33	0.53
Spire Inc.	84.91	52.25	1.63	59.00	75.00	4.92	7.99	0.38	3.07
Sample Average	**79.76**	**48.17**	**1.64**	**139.21**	**158.14**	**3.03**	**4.90**	**0.38**	**1.87**
Sample Median									**1.28**

Source: Value Line Investment Survey, Issue 3 (Natural Gas Utility), February 20, 2026.

Schedule MLR-6f - Sustainable Growth DCF (Results) (90-Day Stock Price)						
Proxy Group	**90-Day Stock Price Ave., P0**	**DPS (2026), D0**	**Current Div Yield, D0/P0**	**Expected Div Yield, D0/P0*(1+0.5g)**	**Sustainable Growth Rate, rb+sv[1]**	**Sustainable Growth DCF, (D1/P0)+rb+sv**
Atmos Energy Corp	170.94	4.00	2.34	2.45	9.35	11.80
New Jersey Resources Corp	48.69	1.90	3.90	4.02	6.01	10.03
Nisource Inc	43.32	1.20	2.77	2.84	4.93	7.77
Northwest Natural	47.57	1.97	4.14	4.25	5.20	9.45
ONE Gas Inc.	79.96	2.72	3.40	3.53	7.81	11.35
Southwest Gas	82.92	2.48	2.99	3.07	5.22	8.29
Spire Inc.	84.91	3.30	3.89	4.05	8.20	12.25
Sample Average	**79.76**	**2.51**	**3.35**	**3.46**	**6.67**	**10.13**
Sample Median						**10.03**

1. See Schedule MLR-6d for internal growth component, rb and Schedule MLR-6e for external growth component, sv.

Source: Value Line Investment Survey, Issue 3 (Natural Gas Utility), February 20, 2026.

Schedule MLR-7a - CAPM Assumptions	
(Historical Large Stock Return, 30-yr T-Bond)	**%**
Historical L-T Equity Risk Premium (1926-2025): Arithmetic Ave.[1]	7.37
Yield on T-Bond (Risk-Free Rate)	4.76
VL Sample Beta	0.79
VL Beta Adjusted Risk Premium	5.79
CAPM ROE	**10.55**

1. www.costofcapital.kroll.com.

2. Risk-free Rate based on 30-day average of yield on 30-Year Treasury bonds. See Schedule MLR-7b. Source: https://www.federalreserve.gov/releases/h15/

Schedule MLR-7b - CAPM Results (Historical Large Stock, 30-yr T-Bond)				
Proxy Group	**Risk-Free Rate**	**VL Beta (1.00 = Market)**	**Historical L-T Equity Risk Premium**	**CAPM ROE**
Atmos Energy Corp	4.76	0.80	7.37	10.66
New Jersey Resources Corp	4.76	0.75	7.37	10.29
Nisource Inc	4.76	0.85	7.37	11.03
Northwest Natural	4.76	0.80	7.37	10.66
ONE Gas Inc.	4.76	0.75	7.37	10.29
Southwest Gas	4.76	0.80	7.37	10.66
Spire Inc.	4.76	0.75	7.37	10.29
Sample Average	**4.76**	**0.79**	**7.37**	**10.55**

Source: Value Line Investment Survey, Issue 3 (Natural Gas Utility), February 20, 2026.

Schedule MLR-7c - CAPM Assumptions	
(Supply-Side ERP, 30-yr T-Bond)	**%**
Supply-Side Equity Risk Premium (1926-2025): Arithmetic Ave.[1]	6.31
Yield on T-Bond (Risk-Free Rate)	4.76
VL Sample Beta	0.79
VL Beta Adjusted Risk Premium	4.96
CAPM ROE	**9.72**

1. www.costofcapital.kroll.com.

2. Risk-free Rate based on 30-day average of yield on 30-Year Treasury bonds. See Schedule MLR-7d. Source: https://www.federalreserve.gov/releases/h15/

Schedule MLR-7d - CAPM Results (Supply-Side Equity ERP, 30-yr T-Bond)				
Proxy Group	**Risk-Free Rate**	**VL Beta (1.00 = Market)**	**Supply-Side Risk Premium**	**CAPM ROE**
Atmos Energy Corp	4.76	0.80	6.31	9.81
New Jersey Resources Corp	4.76	0.75	6.31	9.50
Nisource Inc	4.76	0.85	6.31	10.13
Northwest Natural	4.76	0.80	6.31	9.81
ONE Gas Inc.	4.76	0.75	6.31	9.50
Southwest Gas	4.76	0.80	6.31	9.81
Spire Inc.	4.76	0.75	6.31	9.50
Sample Average	**4.76**	**0.79**	**6.31**	**9.72**

Source: Value Line Investment Survey, Issue 3 (Natural Gas Utility), February 20, 2026.

Schedule MLR-7e - CAPM Assumptions	
(D&P Normalized RF Rate)	**%**
D&P Recommended US ERP[1]	5.00
D&P Normalized Risk-Free Rate[1]	3.50
VL Sample Beta	0.79
VL Beta Adjusted Risk Premium	3.93
CAPM ROE	**7.43**

1. Kroll, "Impact of the Middle East Conflict on Cost of Capital Assumptions – March 2026 Update" (March 24, 2026), at 4.

Schedule MLR-7f - CAPM Results (D&P Normalized RF Rate)				
Proxy Group	**Normalized Risk-Free Rate[1]**	**VL Beta (1.00 = Market)**	**Recommended Market Risk Premium[1]**	**CAPM ROE**
Atmos Energy Corp	3.50	0.80	5.00	7.50
New Jersey Resources Corp	3.50	0.75	5.00	7.25
Nisource Inc	3.50	0.85	5.00	7.75
Northwest Natural	3.50	0.80	5.00	7.50
ONE Gas Inc.	3.50	0.75	5.00	7.25
Southwest Gas	3.50	0.80	5.00	7.50
Spire Inc.	3.50	0.75	5.00	7.25
Sample Average	**3.50**	**0.79**	**5.00**	**7.43**

Source: Value Line Investment Survey, Issue 3 (Natural Gas Utility), February 20, 2026.

1. Kroll, "Impact of the Middle East Conflict on Cost of Capital Assumptions – March 2026 Update" (March 24, 2026), at 4.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please provide the most current balances for all components of the Company's capital structure, net outstanding debt balances, effective cost rate on such debt, and equity contributions.

Response

The most current balances for all components of the Company's capital structure including debt and equity balances are shown in the table below.

National Fuel Gas Distribution Corp. (NFGDC)

	9/30/2025	12/31/2025
Capital Structure		
Long Term Debt	600,000	600,000
Common Equity	768,205	788,742
Total Capitalization	1,368,205	1,388,742
Capital Ratios		
Long Term Debt	43.9%	43.2%
Equity	56.1%	56.8%
Total Capitalization	100.0%	100.0%

Note: Common Equity excludes Accumulated Other Comprehensive Income

Note that the debt balances and effective cost rate of debt as of 12/31/2025 are unchanged from the HTY period that ended on 9/30/2025. Please reference page 2 of 53.53.III-E.6 for the effective cost of debt as of 9/30/2025.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please provide: a.) the end-of-quarter rate base amounts for NFGDC for the years (2021-2025) and the test year; b.) the end of quarter amounts for NFGDC of short-term debt, long-term debt, and common equity, for the years (2021-2025) and the test year; and c.) the data and work papers in both PDF and Microsoft Excel formats, with all data and formulas intact.

Response

Please see the following:

a. Please see response to OCA-VIII-3, Attachment 1.
b. Please see the table below along with Attachment 1 for Excel format, included in this response.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Quarter Ending		($000's) Short-Term Debt	($000's) Long-Term Debt	($000's) Common Equity[(1)]
Dec-2020		$118,300	$324,000	$636,515
Mar-2021		$54,200	$374,000	$658,750
Jun-2021		$58,400	$374,000	$653,688
Sep-2021		$123,400	$374,000	$638,449
Dec-2021		$162,000	$374,000	$650,874
Mar-2022		$132,600	$374,000	$694,191
Jun-2022		$142,200	$374,000	$686,907
Sep-2022		$249,200	$374,000	$665,539
Dec-2022		$304,300	$374,000	$679,210
Mar-2023		$255,800	$325,000	$700,780
Jun-2023		$52,200	$475,000	$690,387
Sep-2023		$105,300	$475,000	$672,744
Dec-2023		$123,000	$475,000	$688,693
Mar-2024		$124,500	$475,000	$723,049
Jun-2024		$125,700	$475,000	$715,148
Sep-2024		$217,300	$475,000	$686,424
Dec-2024		$264,100	$475,000	$706,591
Mar-2025		$101,200	$650,000	$758,104
Jun-2025		$166,500	$600,000	$749,776
Sep-2025	HTY	$191,700	$600,000	$768,205
Sep-2026	FTY	$176,432	$600,000	$837,483
Oct-2027	FPFTY	$46,776	$750,000	$968,511

(1) Common Equity excludes AOCI

Question: OCA-VIII-10
Witness: Welch
Attachment 1

National Fuel Gas Distribution Corporation
Pennsylvania Division
Response to Request for Information
R-2025-3059428

Quarter Ending		($000's) Short-Term Debt	($000's) Long-Term Debt	($000's) Common Equity[(1)]	Equity Ratio w/o st debt	Equity Ratio w/ st debt
Dec-2020		$118,300	$324,000	$636,515	0.662680871	0.590013022
Mar-2021		$54,200	$374,000	$658,750	63.79%	60.61%
Jun-2021		$58,400	$374,000	$653,688	63.61%	60.19%
Sep-2021		$123,400	$374,000	$638,449	63.06%	56.21%
Dec-2021		$162,000	$374,000	$650,874	63.51%	54.84%
Mar-2022		$132,600	$374,000	$694,191	64.99%	57.81%
Jun-2022		$142,200	$374,000	$686,907	64.75%	57.09%
Sep-2022		$249,200	$374,000	$665,539	64.02%	51.64%
Dec-2022		$304,300	$374,000	$679,210	64.49%	50.03%
Mar-2023		$255,800	$325,000	$700,780	68.32%	54.68%
Jun-2023		$52,200	$475,000	$690,387	59.24%	56.70%
Sep-2023		$105,300	$475,000	$672,744	58.61%	53.69%
Dec-2023		$123,000	$475,000	$688,693	59.18%	53.52%
Mar-2024		$124,500	$475,000	$723,049	60.35%	54.67%
Jun-2024		$125,700	$475,000	$715,148	60.09%	54.35%
Sep-2024		$217,300	$475,000	$686,424	59.10%	49.79%
Dec-2024		$264,100	$475,000	$706,591	59.80%	48.88%
Mar-2025		$101,200	$650,000	$758,104	53.84%	50.23%
Jun-2025		$166,500	$600,000	$749,776	55.55%	49.45%
Sep-2025	HTY	$191,700	$600,000	$768,205	56.15%	49.25%
Sep-2026	FTY	$176,432	$600,000	$837,483	58.26%	51.89%
Oct-2027	FPFTY	$46,776	$750,000	$968,511	56.36%	54.86%

(1) Common Equity excludes AOCI

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please provide the most current balances for all components of NFGDC Parent Company's capital structure, net outstanding debt balances, effective cost rate on such debt, and equity contributions.

Response

The most current balances for all components of NFGC's capital structure including debt and equity balances are shown in the table below.

National Fuel Gas Company (NFG)

	9/30/2025	12/31/2025
Capital Structure		
Long Term Debt	2,700,000	2,700,000
Common Equity	3,153,826	3,282,950
Total Capitalization	5,853,826	5,982,950
Capital Ratios		
Long Term Debt	46.1%	45.1%
Equity	53.9%	54.9%
Total Capitalization	100.0%	100.0%

Note: Common Equity excludes Accumulated Other Comprehensive Income and acquisition related equity

The cost of debt for NFGC as of 12/31/2025 is 5.25% as shown on the following page based on the methodology used for 53.53.III-E.6.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
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National Fuel Gas Company
Calculation of the Composite Interest Rate of Total Debt
Actual at December 31, 2025

Type	Amount Outstanding	Effective Cost Rate(1)	Annualized Cost	Composite Cost Rate
Medium-Term Notes				
3.95% Due 2027	$ 300,000,000	4.15%	$ 12,450,000	
4.75% Due 2028	300,000,000	4.97%	14,910,000	
2.95% Due 2031	500,000,000	3.06%	15,300,000	
5.50% Due 2026	300,000,000	5.79%	17,370,000	
5.71% Due 2026	300,000,000	5.83%	17,490,000	
5.499% Due 2030	500,000,000	5.71%	28,550,000	
5.949% Due 2035	500,000,000	6.12%	30,600,000	
Total Medium-Term Notes	$ 2,700,000,000		$ 136,670,000	5.06%
Committed Line of Credit Fee			3,515,065	0.13%
Net Premium and Issuance Expense Adjustments (2)				
2017 October	$ (1,808,479)			
2018 September	$ (3,261,791)			
2025 March (30)	(4,191,818)			
2025 March (35)	(8,925,788)			
Total Adjustments	$ (18,187,875)			
Annual Amortization of Premium (Pre-Tax) (3)				
2017 October			$ 704,700	
2018 September			946,524	
2025 March (30)			133,500	
2025 March (35)			273,750	
Reduction of Annualized Cost Resulting from Recovery of Annual Premium Amortization (4)				
2017 October			$ (213,402)	
2018 September			(303,485)	
2025 March (30)			(2,476)	
2025 March (35)			(5,496)	
			$ 1,533,615	
Total Long-Term Debt	$ 2,681,812,125		$ 141,718,680	5.28%
Short-Term Debt	$ 187,437,557 (5)	4.76% (6)	$ 8,922,028	
Total Debt	$ 2,869,249,682		$ 150,640,708	5.25%

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Provide a comprehensive list of clauses, rate mechanisms, trackers, and/or riders that the Commission permits the Company to utilize for cost recovery between general rate cases. Include the relevant docket numbers and copies of the corresponding Commission decisions or orders in the most recent proceedings.

Response

The Commission allows the Company to recover certain costs between rate cases using specific riders, clauses, and adjustment mechanisms that are already built into the Company tariff. The most recent approval for these mechanisms came from the Company's last Pennsylvania rate case ("last brc"), Docket No. R-2022-3035730, with a tariff effective August 1, 2023.

The Commission approved clauses, rate mechanisms, trackers, and riders currently permitted for cost recovery between general rate cases include the following: Purchase Gas Cost clause (Rider A), State Adjustment surcharge (Rider B), Customer Education Charge (Rider E), Customer Assistance Program (Rider F), Merchant Function Charge (Rider G), Gas Procurement Charge (Rider H), OPEB related temporary riders, and Distribution System Improvement Charge (DSIC). The initial DSIC, Docket No. P-2022-3034957, was effective beginning January 1, 2025.

Please see attached for the last brc and DSIC orders.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission

v. Docket No. R-2025-3059428

National Fuel Gas Distribution Corp.
:

VERIFICATION

I, Maureen L. Reno, hereby state that the facts above set forth in my Direct Testimony, OCA Statement 3, are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

DATED: April 16, 2026 Signature:
Maureen L. Reno

Address:

19 Hope Hill Road,
Derry, New Hampshire 03038

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	)	
	)	
v.	)	**DOCKET NO. R-2025-3059428**
	)	
National Fuel Gas Distribution Corporation	)	
	)	

SURREBUTTAL TESTIMONY OF

MAUREEN L. RENO

ON BEHALF OF THE

COMMONWEALTH OF PENNSYLVANIA

OFFICE OF CONSUMER ADVOCATE

Dated: May 27, 2026

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R-2025-3059428
NATIONAL FUEL GAS DISTRIBUTION CORPORATION - BASE RATE CASE
SURREBUTTAL TESTIMONY OF
MAUREEN L. RENO

I. IDENTIFICATION

Q. PLEASE STATE YOUR FULL NAME, OCCUPATION, AND BUSINESS ADDRESS.

A. My name is Maureen L. Reno. I am an economist with a specialization in public utility economics and finance. I am the principal consultant of Reno Energy Consulting Services, L.L.C. My business address is 19 Hope Hill Road, Derry, New Hampshire 03038.

Q. ARE YOU THE SAME MAUREEN L. RENO EXPERT WITNESS WHO PROVIDED DIRECT TESTIMONY IN THIS DOCKET?

A. Yes.

Q. ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?

A. I am serving as an expert witness on cost of capital, ROE, and capital structure on behalf of the Pennsylvania Office of Consumer Advocate (“OCA”).

II. OVERVIEW

Q. WHAT IS THE PURPOSE OF THIS SURREBUTTAL TESTIMONY?

A. The purpose of this testimony is to respond to the rebuttal testimony of Mr. Joshua C. Nowak and Company witness James C. Welch as it relates to my cost of capital, capital structure, return on equity ("ROE"), and rate of return ("ROR") recommendations.

Q. PLEASE SUMMARIZE MR. NOWAK'S PRINCIPAL CRITIQUES OF YOUR DIRECT TESTIMONY.

A. Mr. Nowak criticizes my recommended capital structure, Discounted Cash Flow ("DCF") growth-rate inputs, Capital Asset Pricing Model ("CAPM") reasonableness check, Bond Yield Plus Risk Premium critique, Hamada-model alternative ROE, and assessment of National Fuel Gas Distribution Company's ("NFGD's") size, business, financial, regulatory, and macroeconomic risk. He also argues that correcting my analysis would increase my average ROE result to 10.55% and that his analyses support a 10.30% to 11.30% range with an 11.00% base ROE.[1]

Q. PLEASE SUMMARIZE MR. WELCH'S PRINCIPAL CRITIQUES OF YOUR DIRECT TESTIMONY.

A. Mr. Welch criticizes my recommendation to use a hypothetical capital structure of 50.00% common equity and 50.00% long-term debt. He argues that the Commission should use NFGD's actual projected capital structure if it falls within the range of a similarly situated proxy group.[2] He also argues that NFGD does not use double leverage, that National Fuel Gas ("NFG"), NFGD's parent company, has not issued debt and infused it into NFGD as equity, and that my reference to NFG's historic test year capital structure should not be used to support a hypothetical capital structure for the fully projected future test year.[3]

[1] NFGD St. 10-R at 12-13, 59-79.
[2] NFGD St. 11-R at 2-5.
[3] *Id.* at 4-5.

Q. DO MR. NOWAK'S OR MR. WELCH'S REBUTTAL CRITICISMS CAUSE YOU TO CHANGE YOUR RECOMMENDATIONS?

A. I continue to recommend an overall ROR of 7.66%, based on a capital structure of 50.00% equity and 50.00% long-term debt, a 5.58% cost of long-term debt, and a 9.74% ROE. I also continue to provide an alternative ROE of 9.06% if the Commission accepts NFGD's proposed 56.40% equity and 43.60% debt capital structure.[4] However, I change my alternative ROE from 9.21% to 9.06% because of corrections I made considering Mr. Nowak's critique of my Hamada model.

My recommendations remain grounded in the *Hope* and *Bluefield* standards, which require a return comparable to returns available on investments of similar risk and sufficient to maintain financial integrity and attract capital on reasonable terms.[5] Mr. Nowak's rebuttal relies on higher-cost inputs and upward adjustments that would increase customer costs without demonstrating that NFGD faces materially greater risk than the proxy group. Mr. Welch's rebuttal does not rebut the customer-cost concern created by NFGD's proposed 56.40% equity ratio, and it does not show that the proposed equity ratio is reasonable compared with recent gas utility authorized equity ratios or the expected proxy group average and median.

[4] OCA St. 3 at 6:6-21.
[5] *Id.* at 3:10-23.

III. CAPITAL STRUCTURE

Q. WHAT CAPITAL STRUCTURE RECOMMENDATIONS ARE BEFORE THE COMMISSION?

A. NFGD proposes a capital structure of 56.40% common equity and 43.60% long-term debt for the fully projected future test year. I recommend a hypothetical capital structure of 50.00% common equity and 50.00% long-term debt. I&E witness Breuning proposes a capital structure of 55.00% common equity and 45.00% long-term debt.[6]

Q. HOW DO MR. NOWAK AND MR. WELCH CRITICIZE YOUR CAPITAL STRUCTURE RECOMMENDATION?

A. Mr. Nowak argues that my 50.00% equity and 50.00% debt recommendation relies on an inappropriate comparison to holding-company capital structures and that I do not provide a substantiated rationale for recommending an equity ratio below recent average authorized equity ratios. He also argues that actual capital structures should be used unless they greatly diverge from industry practice or are clearly unsound or extravagantly conservative.[7] Mr. Welch similarly argues that the Commission should use the Company's actual capital structure if it falls within the range of a similarly situated proxy group and cites Commission precedent favoring use of actual capital structures absent a finding that they are atypical or too heavily weighted toward debt or equity.[8]

[6] NFGD St. 11-R at 1-2.
[7] NFGD St. 10-R at 12-14.
[8] NFGD St. 11-R at 2-3.

Q. DO YOU AGREE THAT THE COMPANY'S PROPOSED CAPITAL STRUCTURE SHOULD BE ADOPTED BECAUSE IT FALLS WITHIN A BROAD PROXY-GROUP RANGE?

A. No. The fact that a capital structure may fall somewhere within a broad proxy-group range does not automatically make it reasonable for ratemaking purposes. Considering that Mr. Nowak's referenced range is 43.17% to 61.05% equity, he would support an equity ratio even if the Company's actual equity ratio was as high as 61.05%, which is unreasonable.[9] The Commission's task is to establish a just and reasonable rate of return. Equity is more expensive than debt, higher equity ratios raise the weighted cost of capital paid by customers, and equity also increases the customer tax burden because dividends are not tax deductible.[10] My testimony evaluates whether the Company's proposed 56.40% equity ratio is reasonable in this case, not merely whether similar or higher equity ratios can be found somewhere in a broad range.[11]

Q. WHAT EVIDENCE SUPPORTS YOUR CONCLUSION THAT NFGD'S PROPOSED EQUITY RATIO IS EXCESSIVE FOR RATEMAKING PURPOSES?

A. NFGD's proposed 56.40% equity ratio exceeds recent average authorized equity ratios for regulated gas utilities, including 52.45% in 2023, 52.52% in 2024, and 51.63% in 2025. It also exceeds the proxy group expected average of 48.00% and median of

[9] NFGD St. 10-R at 16, Figure 3.
[10] OCA St. 3 at 21:21-24, 22:1-6.
[11] *Id.* at 24.

45.00% for 2026.[12] Because equity is the more expensive form of capital, using a higher equity ratio increases the total rate of return customers must pay.[13]

Q. DOES YOUR 50.00% COMMON EQUITY RECOMMENDATION FALL WITHIN MAINSTREAM COMMISSION PRACTICE?

A. Yes. My recommendation is not an outlier. The recent rate-case history I reviewed includes more than 40 state commission-approved decisions or settlements using a 50.00% common equity ratio,[14] including natural gas distribution cases for Southwest Gas in Arizona and Nevada, Ameren Illinois and Northern Illinois Gas in Illinois, Northwest Natural in Oregon, and Puget Sound Energy in Washington, as well as electric distribution examples such as United Illuminating in Connecticut and Public Service Company of New Hampshire d/b/a Eversource. Those examples include fully litigated decisions as well as approved settlements. They reflect the same ratemaking principle underlying my recommendation: equity is more expensive than debt, so the authorized capital structure should provide enough equity to support financial integrity and access to capital without requiring customers to fund an equity-rich structure. The Ameren Illinois and Eversource decisions are particularly instructive because those commissions adopted 50.00% common equity after considering higher company-proposed equity levels and customer-cost concerns.[15]

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[12] *Id.* at 24:1-6.
[13] *Id.* at 21: 6-24, 22:1-6.
[14] Ex. MLR-1-SR: Schedule MLR-1-SR.
[15] *Ameren Ill. Co., d/b/a Ameren Ill.*, ICC Docket No. 25-0084, Final Order at 213; *Public Service Company of New Hampshire d/b/a Eversource*, NH PUC Docket No. DE 24-070, Order at 41-43.

Q. DOES YOUR RECOMMENDATION IGNORE NFGD'S ACTUAL CAPITAL STRUCTURE?

A. No. I considered NFGD's actual and proposed capital structure. NFGD's actual capitalization for the historical period ended September 30, 2025 was 43.90% long-term debt and 56.10% equity, and the Company's equity ratio excluding short-term debt decreased from 64.02% in September 2022 to 56.15% in September 2025.[16] I also considered NFGD's proposed fully projected future test year capital structure of 56.40% equity and 43.60% debt.[17] My conclusion is that the proposed equity ratio is unreasonable for ratemaking purposes because it is above recent industry-authorized averages and proxy-group expected measures and imposes unnecessary costs on customers.

Q. HOW SHOULD THE COMMISSION VIEW MR. NOWAK'S AND MR. WELCH'S RELIANCE ON PRECEDENT FAVORING ACTUAL CAPITAL STRUCTURES?

A. Use of an actual capital structure is not an end in itself. The purpose is to set a just and reasonable rate of return. The precedent cited by Mr. Welch still requires the Commission to evaluate whether the proposed capital structure is atypical or too heavily weighted on either the debt or equity side.[18] My recommendation addresses that reasonableness question by considering the Company's proposed capital structure,

[16] OCA St. 3 at 23.
[17] *Id.* at 17-24.
[18] NFGD St. 11-R at 2:11-23, 3:1-11.

recent authorized gas utility equity ratios, expected proxy-group capital structures, and the customer-cost impact of excess equity.

Q. HOW DO YOU RESPOND TO THE COMPANY'S CRITICISM OF YOUR DOUBLE-LEVERAGE CONCERN?

A. My testimony does not ask the Commission to disregard NFGD's stand-alone operations. Rather, it identifies a ratemaking concern created when a parent company issues debt and infuses capital into a regulated subsidiary as common equity. That concern is relevant because NFGD is not publicly traded and obtains financing through its parent, NFG. Mr. Nowak's assertion that the concern is inconsistent with the stand-alone regulatory principle does not eliminate the Commission's responsibility to evaluate whether the proposed equity ratio is reasonable for customers.[19]

Q. DOES THE COMPARISON BETWEEN NFGD'S PROPOSED EQUITY RATIO AND NFG'S PROJECTED EQUITY RATIO CHANGE YOUR RECOMMENDATION?

A. No. Mr. Nowak states that NFGD's proposed 56.40% equity ratio is 610 basis points below NFG's projected 62.50% equity ratio.[20] That assertion does not rebut the customer-cost concern or the ratemaking evidence showing that NFGD's proposed equity ratio is above recent gas utility authorized averages and above the expected proxy-group average and median.[21]

[19] NFGD St. 10-R at 19-22.
[20] *Id.* at 20:21-24, 21:1-2.
[21] OCA St. 3 at 22-24.

Q. DOES I&E'S POSITION IN NFGD'S PRIOR RATE CASE AFFECT YOUR RECOMMENDATION?

A. No. Mr. Welch states that, in the Company's most recent rate case, I&E supported the Company's claimed capital structure because it fell within the range of the proxy group's most recent available capital structures.[22] That was a case-specific position in a prior proceeding. It does not determine whether NFGD's proposed 56.40% equity ratio is reasonable in this case. My recommendation is based on the current record, including the Company's proposed fully projected future test year capital structure, recent authorized gas utility equity ratios, expected proxy-group capital structures, and the ratepayer impact of excess equity.

Q. SHOULD CUSTOMER AFFORDABILITY ALSO INFORM THE COMMISSION'S EVALUATION OF NFGD'S PROPOSED CAPITAL STRUCTURE?

A. Yes. As I discuss in more detail later in my testimony regarding macroeconomic conditions and affordability, the current economic climate reinforces the need to avoid unnecessary customer costs in setting NFGD's rate of return. My recommended 50.00% common equity and 50.00% long-term debt capital structure is fair to both the Company and customers. It provides sufficient equity to support financial integrity and access to capital, while avoiding the higher customer costs associated with the Company's proposed equity-rich capital structure. Other OCA witnesses also explain

[22] NFGD St. 11-R at 3:20-27.

that customers are facing significant affordability pressures. In that context, the Commission should use the ratemaking tools available to it, including a reasonable hypothetical capital structure, to set just and reasonable rates and to avoid requiring customers to fund excessive equity costs.

Q. WHAT CAPITAL STRUCTURE SHOULD THE COMMISSION ADOPT?

A. The Commission should reject the Company's proposed 56.40% equity and 43.60% long-term debt capital structure and adopt my recommended 50.00% equity and 50.00% long-term debt capital structure for ratemaking purposes. That recommendation recognizes the customer-cost impact of excess equity, the recent authorized equity ratios for regulated gas utilities, the expected proxy-group capital structures, and the financing relationship between NFGD and its parent company.

IV. NFG HISTORIC TEST YEAR AND FPFTY COMPARISON

Q. HOW DOES MR. WELCH CRITICIZE YOUR REFERENCE TO NFG'S HISTORIC TEST YEAR CAPITAL STRUCTURE?

A. Mr. Welch argues that, to remain consistent with the revenue requirement calculations, the projected capital structure at the end of the fully projected future test year ("FPFTY") should be used. He also states that comparing NFG's historic test year equity ratio as of January 31, 2025, to NFGD's equity ratio as of October 31, 2027, is illogical and lacks any basis for consideration.[23]

[23] NFGD St. 11-R at 5:4-12.

Q. HOW DO YOU RESPOND?

A. My capital structure recommendation does not depend solely on the comparison between NFG's historic test year equity ratio and NFGD's FPFTY equity ratio. I considered multiple benchmarks: NFGD's actual historical capital structure, its proposed FPFTY capital structure, recent average authorized equity ratios for gas utilities, the proxy group expected average and median, and the customer cost implications of a higher equity ratio.[24]

Q. MR. WELCH STATES THAT NFG HAS A PROJECTED FPFTY EQUITY RATIO OF 62.50%, WHICH IS HIGHER THAN NFGD'S PROPOSED 56.40% EQUITY RATIO. DOES THAT CHANGE YOUR CONCLUSION?

A. No. Mr. Welch states that NFG's projected FPFTY equity ratio is 62.50%, compared with NFGD's proposed 56.40% equity ratio. That comparison does not establish that NFGD's proposed equity ratio is reasonable for ratemaking purposes. My testimony shows that NFGD's proposed equity ratio exceeds recent average authorized gas utility equity ratios and exceeds the expected proxy group average and median.[25] The central issue remains whether customers should bear the higher cost associated with the Company's requested equity-heavy capital structure.

[24] OCA St. 3 at 22-24.
[25] *Id.* at 24.

IV. DOUBLE LEVERAGE AND PARENT-COMPANY FINANCING

Q. HOW DO MR. NOWAK AND MR. WELCH RESPOND TO YOUR DOUBLE-LEVERAGE DISCUSSION?

A. Mr. Nowak states that my double leverage concern is unfounded and inconsistent with the stand-alone regulatory principle.[26] Mr. Welch states that NFGD does not use double leverage and that NFG has not issued debt and infused it into NFGD as equity.[27] Mr. Welch also states that double leverage is not relevant or instructive because, in his view, the Company has not used double leverage.[28]

Q. DO THOSE REBUTTAL CRITICISMS CAUSE YOU TO WITHDRAW YOUR CONCERN?

A. No. My direct testimony does not ask the Commission to disregard NFGD's stand-alone operations. Rather, it identifies a ratemaking concern that can arise when a parent company issues debt and infuses capital into a regulated subsidiary as common equity.[29] That concern is relevant because equity is more expensive than debt, higher equity ratios increase the weighted cost of capital paid by customers, and dividends are not tax deductible.[30]

[26] NFGD St. 10-R at 19:10-12.
[27] NFGD St. 11-R, at 4:7-10.
[28] *Id.* at 4:12-16.
[29] OCA St. 3 at 24:9-11, 25:1-10.
[30] *Id.* at 21:21-24, 22:1-6.

Q. IF MR. WELCH STATES THAT NFGD DOES NOT USE DOUBLE LEVERAGE, WHY IS PARENT-COMPANY FINANCING STILL RELEVANT?

A. Parent-company financing remains relevant because NFGD is not publicly traded and obtains financing through its publicly traded parent company, NFG.[31] Mr. Welch likewise states that NFGD relies on NFG as a source of capital through public offerings of debt securities and that this financing arrangement is governed by a Credit and Security Agreement.[32] That financing relationship is relevant to evaluating the reasonableness of the capital structure charged to customers in this rate case.

Q. DOES COMMISSION APPROVAL OF THE CREDIT AND SECURITY AGREEMENT RESOLVE THE RATEMAKING CAPITAL STRUCTURE ISSUE?

A. No. Mr. Welch states that the Commission has accepted the Credit and Security Agreement as reasonable and consistent with the public interest.[33] But approval of that financing agreement does not determine the appropriate ratemaking capital structure in this base rate case. The issue here is whether customers should pay a return based on NFGD's proposed 56.40% equity ratio or on a more reasonable capital structure.[34]

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[31] *Id.* at 27:6-10, 35:8-15.
[32] NFGD St. 11-R at 4:18-23, 5:1-2.
[33] *Id.*
[34] OCA St. 3 at 21: 21-24, 22: 1-6.

Q. HOW SHOULD THE COMMISSION CONSIDER THE DOUBLE LEVERAGE ISSUE IN THIS CASE?

A. The Commission should consider the double leverage discussion as part of the broader capital structure reasonableness analysis. Even accepting Mr. Welch's statement that NFGD has not used double leverage in the manner he describes, the record still shows that NFGD is financed through its parent and that the proposed 56.40% equity ratio would increase the customer cost of capital. Therefore, Mr. Nowak's and Mr. Welch's rebuttal testimony does not eliminate the need to evaluate whether NFGD's proposed capital structure is reasonable for ratemaking purposes.

Q. WHAT CONCLUSION SHOULD THE COMMISSION REACH?

A. The Commission should reject the argument that parent-company financing and double leverage concerns are irrelevant. Those issues support the need to scrutinize NFGD's proposed equity-rich capital structure and to protect customers from paying a return based on excessive equity. My recommended 50.00% equity and 50.00% long-term debt capital structure remains reasonable for ratemaking purposes.

V. MANAGEMENT EFFICIENCY ADDER

Q. HOW DOES MR. NOWAK RESPOND TO YOUR CRITIQUE OF THE COMPANY'S PROPOSED MANAGEMENT EFFICIENCY ADDER?

A. Mr. Nowak disagrees with the intervenor witnesses' characterization of the adder, continues to support it in concept, but states that NFGD has chosen to forgo the request in this case due to customer affordability, inflationary pressures, and bill impacts.[35]

Q. DOES THE WITHDRAWAL OF THE MANAGEMENT EFFICIENCY ADDER AFFECT YOUR RECOMMENDATION?

A. It confirms that no management efficiency adder should be included in the authorized ROE in this proceeding. My direct testimony explained that the proposed 25-basis-point adder was unsupported by the record, duplicative of factors already embedded in market-based ROE results, and inconsistent with established ratemaking principles.[36]

Q. SHOULD THE MANAGEMENT EFFICIENCY ISSUE HAVE ANY CONTINUING EFFECT ON THE BASE ROE?

A. No. Once NFGD withdrew the adder, the Commission should not allow the same concept to influence the base ROE indirectly. My direct testimony explained that market-derived ROE models already reflect investor expectations regarding management quality, operational efficiency, and execution risk for comparable companies.[37] The appropriate conclusion is that a reasonable ROE can be determined

[35] NFGD St. 10-R at 21-22.
[36] OCA St. 3 at 59-62.
[37] *Id.* at 61:20-28.

using the Company's risk profile and standard financial models without any separate adjustment for management performance.

VI. DCF GROWTH INPUTS

Q. HOW DOES MR. NOWAK CRITICIZE YOUR DCF ANALYSIS?

A. Mr. Nowak argues that projected earnings growth is superior to dividend and book value growth estimates, that there are no consensus dividend growth forecasts comparable to earnings per share ("EPS") forecasts, and that my combined dividend per share ("DPS"), EPS, and book value per share ("BVPS") growth results should be disregarded.[38]

Q. DO YOU AGREE THAT EPS GROWTH SHOULD BE THE ONLY GROWTH INPUT IN THE DCF MODEL?

A. No. I use EPS growth in my analysis, but I do not agree that it should be the only growth input. My first DCF variant uses EPS forecasts from Value Line, S&P MI, and Zacks and produces median results of 10.48% and 10.61%.[39] I then refine the growth calculation by averaging DPS and BVPS growth estimates with EPS growth because investors are not concerned only with earnings growth; they also consider dividend growth and book value growth as indicators of whether dividend growth can be sustained.[40]

[38] NFGD St. 10-R at 62-63.
[39] OCA St. 3, at 44.
[40] *Id.* at 44-45.

Q. WHY IS IT IMPORTANT TO CONSIDER DIVIDEND AND BOOK VALUE GROWTH IN A DCF ANALYSIS?

A. The DCF model is fundamentally a dividend discount model. I explained in my direct testimony, the value of stock is based on the present value of expected dividends and that the model estimates the required return by adding expected dividend yield and expected growth.[41] Because the model is based on dividends, it is reasonable to consider whether dividends are sustainable. Earnings are relevant, but investors may not rely on a single growth estimate when valuing a utility's stock.[42]

Q. MR. NOWAK SAYS YOUR COMBINED DPS, EPS, AND BVPS DCF RESULTS ARE BELOW RECENT AUTHORIZED ROES AND FAIL THE COMPARABLE RETURN STANDARD. HOW DO YOU RESPOND?

A. I disagree. Mr. Nowak's comparison relies on authorized ROEs as if they were a direct measure of investor-required returns. In my direct testimony, I explained that authorized ROEs measure commission decisions, not investor behavior, and can reflect many factors other than market-required returns, including capital structure, credit ratings, settlements, utility performance, and other risk measures.[43]

[41] *Id.* at 42.
[42] *Id.* at 44, 50.
[43] *Id.* at 56-57.

Q. DOES MR. NOWAK'S EPS-ONLY APPROACH CREATE AN UPWARD BIAS?

A. Yes. In my direct testimony, I explained that Mr. Nowak relies almost exclusively on earnings growth estimates, which inflates his DCF and CAPM results.[44] I also explained that while his median DCF results are similar to my EPS-only DCF results, he isolates growth rates and appears to rely on higher-growth results to support his ROE recommendation.[45] If Mr. Nowak incorporated more than earnings growth, including dividend and book value growth, his DCF estimates would be lower.[46]

VII. SUSTAINABLE-GROWTH DCF

Q. HOW DOES MR. NOWAK CRITICIZE YOUR SUSTAINABLE GROWTH DCF ANALYSIS?

A. Mr. Nowak argues that the sustainable growth DCF should receive no weight because, in his view, the theory underlying retention growth does not hold and because the model requires estimates of multiple variables.[47]

Q. DO YOU AGREE THAT THE SUSTAINABLE GROWTH DCF SHOULD BE DISREGARDED?

A. No. I use the sustainable growth DCF as one DCF variant, not as the sole basis for my recommendation. The method recognizes that growth in earnings and dividends can be

[44] *Id.* at 5:9-29.
[45] *Id.* at 45:12-22, 46:1-17.
[46] *Id.* at 46:14-17.
[47] NFGD St. 10-R at 63-66.

achieved not only through retention of earnings but also through external equity financing. I used Value Line expectations regarding retention ratios and ROEs to estimate the internal growth component, and Value Line data concerning market-to-book ratios and expected shares outstanding to estimate the external financing growth component.[48]

Q. HOW DOES THE SUSTAINABLE GROWTH DCF FIT WITHIN YOUR OVERALL ROE RECOMMENDATION?

A. The sustainable-growth DCF results are part of the range of evidence. They produce median ROE estimates of 9.87% and 10.03%, which fall within my DCF range and support my 9.74% midpoint recommendation.[49] My recommendation is not dependent on any single DCF variant. It is based on the range of DCF results and supported by the CAPM as a reasonableness check.

Q. DOES MR. NOWAK'S CRITIQUE INVALIDATE THE SUSTAINABLE GROWTH DCF FOR THIS CASE?

A. No. His critique identifies potential limitations of one DCF variant, but all ROE models require judgment and no single model is perfect. The appropriate response is not to rely exclusively on EPS growth, which creates its own upward bias, but to consider a range of reasonable DCF growth inputs. The sustainable growth DCF is a reasonable component of that range.

[48] OCA St. 3 at 47:17-22, 48:1-2.
[49] *Id.* at 49:3-8, Table 3.

VIII. CAPM AND KROLL INPUTS

Q. HOW DOES MR. NOWAK CRITICIZE YOUR CAPM ANALYSIS?

A. Mr. Nowak states that I use three CAPM estimates ranging from 7.43% to 10.55% with a midpoint of 8.99%, and he argues that I do not consider whether some results are too low.[50]

Q. DO YOU RELY ON THE CAPM AS THE BASIS FOR YOUR RECOMMENDED ROE?

A. No. My recommended ROE is based on the midpoint of my DCF results. I use the CAPM only as a check on the reasonableness of the DCF results. The CAPM results range from 7.43% to 10.55% with a midpoint of 8.99%.[51] Because my recommended 9.74% ROE is above the CAPM midpoint and within my DCF range, the CAPM check supports rather than undermines my recommendation.[52]

Q. HOW DO YOU RESPOND TO MR. NOWAK'S ASSERTION THAT YOUR 7.43% CAPM RESULT IS TOO LOW?

A. The 7.43% result is one CAPM scenario and is not my recommended ROE. I used the CAPM as a reasonableness check, and the full CAPM range includes a 10.55% result.[53] The relevant point is that the CAPM results, taken together, do not support Mr. Nowak's 11.00% base ROE or the previously requested 11.25% ROE with the management efficiency adder.

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[50] NFGD St. 10-R at 67:1-7.
[51] OCA St. 3 at 55:1-3, Table 4.
[52] *Id.* at 6-7.
[53] *Id.* at 55, Table 4.

Q. HOW DOES MR. NOWAK CRITICIZE YOUR USE OF KROLL MARKET RISK PREMIUM INPUTS?

A. Mr. Nowak argues that Kroll's recommended 5.00% Equity Risk Premium ("ERP") does not move in a clear inverse relationship with Kroll's recommended risk-free rate, and that Kroll's supply-side and long-term historical market risk premiums do not adequately reflect forward-looking investor expectations.[54]

Q. DO YOU AGREE THAT YOUR KROLL INPUTS SHOULD BE REJECTED?

A. No. Kroll is a recognized source of cost of capital inputs, and I used multiple Kroll-based ERP measures to avoid reliance on a single estimate. My CAPM analyses use ERP estimates ranging from 5.00% to 7.37%, including Kroll's historical arithmetic average of real market returns, Kroll's supply-side ERP, and Kroll's recommended U.S. ERP paired with Kroll's normalized risk-free rate.[55] Mr. Nowak's criticism does not show that these inputs are unreasonable; it shows that he prefers a higher market return assumption.

Q. WHY DO YOU REJECT MR. NOWAK'S MARKET RISK PREMIUM INPUTS?

A. Mr. Nowak's market return assumptions are overstated. He estimates an expected market return for the S&P 500 of 15.09%, with implied market risk premiums of 10.43% to 10.79%, and an alternative FERC-convention market return of 11.62%.[56] I

[54] NFGD St. 10-R at 67-70.
[55] OCA St. 3 at 55:1-3, Table 4.
[56] *Id.* at 53.

explained that the 11.62% market return far exceeds investors' current expectations, including the Federal Reserve Bank of Philadelphia's reported average expected S&P 500 return of 7.31% and median of 7.00% over 2026-2035.[57] Mr. Nowak's use of higher EPS-based market return estimates inflates his CAPM results.

Q. DOES MR. NOWAK'S STATEMENT, THAT FORWARD-LOOKING INPUTS ARE NEEDED, CHANGE YOUR CONCLUSION?

A. No. My testimony already accounts for current market conditions using recent Treasury yields, current Kroll inputs, Value Line beta coefficients, and a reasonableness comparison to longer-term market return data. Forward-looking analysis does not require adopting an overstated S&P 500 expected market return or an inflated market risk premium.

IX. BOND YIELD PLUS RISK PREMIUM

Q. HOW DOES MR. NOWAK RESPOND TO YOUR CRITIQUE OF HIS BOND YIELD PLUS RISK PREMIUM ANALYSIS?

A. Mr. Nowak argues that the Risk Premium approach provides another useful perspective, that it is based on an inverse relationship between Treasury bond yields and equity risk premiums, that some other state regulators use risk premium methods, and that it provides stability relative to DCF and CAPM results.[58]

[57] *Id.* at 53:19-23, 54:1-4.
[58] NFGD St. 10-R at 72-75.

Q. DO YOU AGREE THAT HIS BOND YIELD PLUS RISK PREMIUM ANALYSIS SHOULD BE USED TO SUPPORT HIS ROE?

A. No. In my direct testimony, I explained that Mr. Nowak's risk premium analysis is problematic because it assumes a simplified inverse relationship without adequate regard to differences in investment risk, changes in the market's perception of debt and equity risk, interest-rate volatility, and the effect of inflation on risk premiums.[59]

Q. WHY IS HIS USE OF AUTHORIZED ROES IN THE RISK PREMIUM MODEL PROBLEMATIC?

A. Authorized ROEs are regulatory outcomes, not direct measures of investor behavior. They may reflect capital structures, credit ratings, utility performance, settlement outcomes, and other risk measures. Mr. Nowak's model relies on authorized ROEs from historical commission decisions, even though he criticizes other witnesses when they use authorized ROEs as a benchmark without sufficient market context.

Q. IS IT NECESSARY TO RELY ON THE BOND YIELD PLUS RISK PREMIUM METHOD TO APPLY MULTIPLE METHODOLOGIES?

A. No. I used the Constant-Growth DCF model as the basis for my recommendation and CAPM as a reasonableness check. Using multiple methodologies does not require accepting every methodology offered by Mr. Nowak, particularly where the method is built on historical authorized ROEs rather than direct investor market behavior.

[59] OCA St. 3 at 56:15-23, 57:1-9.

X. HAMADA MODEL ALTERNATIVE ROE

Q. HOW DOES MR. NOWAK CRITICIZE YOUR ALTERNATIVE ROE CALCULATED USING THE HAMADA MODEL?

A. Mr. Nowak argues that my Hamada model is flawed because I used 50.00% as the "Proxy Equity Ratio," because my market risk premium inputs are flawed, and because I use the CAPM framework for the alternative ROE while using DCF results for my primary recommendation.[60]

Q. WHAT WAS THE PURPOSE OF YOUR HAMADA MODEL?

A. The purpose of applying the Hamada model is to show how the Company's proposed capital structure affects the indicated cost of equity. The Hamada model is a capital structure adjustment to beta coefficients in the CAPM framework, not a standalone model. It separates operating risk from financing risk and shows how leverage changes equity risk and the CAPM cost of equity.[61]

Q. WHY IS THE HAMADA ANALYSIS RELEVANT IF YOUR PRIMARY RECOMMENDATION IS BASED ON THE DCF MODEL?

A. Because capital structure changes financial risk, investors view higher debt as increasing leverage risk, and conversely, excessive equity lowers financial risk while increasing the cost of capital. The Hamada model illustrates that if the Commission adopts NFGD's proposed lower-debt, higher-equity capital structure, the indicated cost of equity is lower because equity investors face less leverage risk.

[60] NFGD St. 10-R at 75-76.
[61] OCA St. 3 at 63-65.

Q. HOW DO YOU RESPOND TO MR. NOWAK'S CRITICISM THAT YOUR "PROXY EQUITY RATIO" IS FLAWED?

A. Mr. Nowak is correct that the label "Proxy Equity Ratio" could be clarified, and the Hamada analysis can be refined using the proxy group average equity ratio. However, because the proxy group equity ratios are not materially different from 50%, as he acknowledges, this issue does not invalidate the analysis or the broader conclusion that a lower-debt, higher-equity capital structure supports a lower equity cost rate.

Q. DID YOU RECALCULATE THE HAMADA-MODEL-DERIVED ROE USING THE PROXY GROUP EQUITY RATIO?

A. Yes. Using the proxy group average equity ratio of 48.00% and 52.00% debt, the resulting ROE if the Commission were to approve the Company's proposed capital structure is 9.06%.[62]

Q. DOES THIS NEW RESULT CAUSE YOU TO CHANGE YOUR RECOMMENDED ALTERNATIVE ROE?

A. Yes. If the Commission approves the Company's proposed capital structure of 56.40% equity and 43.60% debt, my recommended alternative ROE is 9.06% in lieu of 9.21%, with a resulting weighted average cost of capital or rate of return of 7.54%.[63]

Q. DOES MR. NOWAK'S CRITICISM OF THE "PROXY EQUITY RATIO" LABEL INVALIDATE THE ANALYSIS?

A. No. The analysis is intended to show the ROE implication of alternative capital structures, including NFGD's proposed 56.40% equity and 43.60% debt capital structure. The underlying economic point remains: a higher equity ratio reduces

leverage risk and therefore supports a lower equity cost rate than would apply under a more leveraged capital structure.

XI. SIZE RISK

Q. HOW DOES MR. NOWAK RESPOND TO YOUR CRITIQUE OF HIS SIZE RISK DISCUSSION?

A. Mr. Nowak states that he did not make a specific size adjustment, but that his recommended ROE above the midpoint of his range considers NFGD's company-specific risks, including small size. He also argues that NFGD should be evaluated on a stand-alone basis and that Kroll's CRSP database includes electric and natural gas utilities.[64]

Q. DO YOU AGREE THAT NFGD'S SIZE SUPPORTS A HIGHER ROE?

A. No. Mr. Nowak did not quantify or apply a discrete size risk adjustment. His size discussion therefore should not be used to justify moving his recommendation above the midpoint of his model range.

Q. WHY IS THE PARENT-COMPANY CONTEXT RELEVANT TO SIZE RISK?

A. NFGD is not a publicly traded stand-alone company. It is a subsidiary of NFG, and it obtains financing through its parent. The financial risks typically associated with small

[62] Ex. MLR-1-SR: Schedule MLR-2-SR.
[63] Ex. MLR-1-SR: Schedule MLR-3-SR.
[64] NFGD St. 10-R at 76:13-20, 77:1-20, 78:1-3.

stand-alone companies are mitigated by access to parent-company financing, centralized financing support, and affiliate resources.[65]

Q. DOES THE PRESENCE OF UTILITIES IN THE CRSP DATABASE RESOLVE YOUR CONCERN WITH KROLL SIZE PREMIUMS?

A. No. My concern is not simply whether any utilities appear in the CRSP database. My concern is whether a generalized small-company return premium, developed from publicly traded companies across many industries, should be applied or used to support a higher ROE for a regulated monopoly utility subsidiary that receives financing and support through a larger parent company.[66] Mr. Nowak's rebuttal does not demonstrate that NFGD requires a size-related ROE increase to attract capital on reasonable terms.

XII. BUSINESS, CUSTOMER CONCENTRATION, AND REGULATORY RISK

Q. HOW DOES MR. NOWAK CRITICIZE YOUR TREATMENT OF BUSINESS AND REGULATORY RISK?

A. Mr. Nowak states that my criticism is too narrow, that NFGD's partial revenue decoupling does not fully insulate the Company from fixed-cost recovery risk, and that NFGD has somewhat elevated regulatory risk due to limitations on its partial revenue decoupling and capital cost recovery mechanisms.[67]

[65] OCA St. 3 at 58:10-22, 59:1-9.
[66] *Id.* at 58:1-22, 59:1-9.
[67] NFGD St. 10-R at 78-79.

Q. DO YOU AGREE THAT NFGD FACES GREATER BUSINESS RISK THAN THE PROXY GROUP?

A. No. My direct testimony addressed the business risk categories Mr. Nowak identified, including capital expenditure risk, small size, customer concentration, and regulatory risk.[68] I concluded that NFGD does not face greater business risk than the proxy group.[69] In a cost-of-service regulatory model, capital investment is the foundation of utility earnings and prudently incurred capital costs are recoverable through rates, including a return on invested capital.

Q. HOW DO YOU RESPOND TO MR. NOWAK'S CUSTOMER CONCENTRATION ARGUMENT?

A. Mr. Nowak overstates the effect of demand risk in a regulated utility context. I explained that NFGD operates under mechanisms that mitigate volumetric and demand risk, including the Weather Normalization Adjustment ("WNA") mechanism, the Distribution Systems Improvement Charge ("DSIC"), fully projected future test years, rate design features such as fixed customer charges, and the ability to reset rates through rate cases. These mechanisms materially reduce the sensitivity of revenues to customer usage fluctuations.[70]

[68] OCA St. 3 at 31-35.
[69] *Id.* at 35:1-5.
[70] *Id.* at 33:13-23, 34:1-8.

Q. DOES NFGD FACE GREATER REGULATORY RISK THAN THE PROXY GROUP?

A. No. Pennsylvania's regulatory environment is constructive from an investor standpoint. I explained that Pennsylvania has an "Above Average/2" ranking from S&P Market Intelligence, that Regulatory Research Associates ("RRA") views Pennsylvania's energy utility regulatory climate as relatively constructive, and that Pennsylvania allows mechanisms that reduce regulatory lag, including forward-looking test years, year-end base valuations, and rate mechanisms between general rate cases.[71]

Q. HOW DO FUTURE TEST YEARS AND RIDERS AFFECT REGULATORY RISK?

A. They reduce it. A future test year aligns rates with the costs expected when rates are in effect and reduces the mismatch between authorized rate base and actual investment.[72] NFGD also has several riders and mechanisms, including the Purchase Gas Cost Clause, State Tax Adjustment Surcharge, Other-Post Employment Benefits ("OPEB") riders, DSIC, and WNA, that support cost recovery between rate cases and reduce regulatory and business risk.[73]

[71] *Id.* at 36:8-21.
[72] *Id.* at 37-38.
[73] *Id.* at 38-40.

Q. DOES MR. NOWAK QUANTIFY ANY REGULATORY-RISK ADJUSTMENT IN REBUTTAL?

A. No. Mr. Nowak states that NFGD has somewhat elevated regulatory risk, but he also states that he does not make a specific ROE adjustment to account for regulatory risk.[74] That supports my conclusion that the record does not justify increasing the ROE above my market-based recommendation for alleged regulatory risk.

XIII. MACROECONOMIC AND FINANCIAL MARKET CONDITIONS

Q. DOES MR. NOWAK'S DISCUSSION OF ELEVATED INFLATION, INTEREST RATES, AND GEOPOLITICAL UNCERTAINTY UNDERMINE YOUR ROE RECOMMENDATION?

A. No. My direct testimony already considered current and expected macroeconomic conditions. I explained that economic conditions provide context for ROE, cost of debt, and ROR recommendations and that investors consider Federal Reserve actions, economic conditions, and fixed-income yields when estimating utility stock returns. I also discussed persistent inflation, oil supply shocks, long-term Treasury yields, and corporate bond yields.[75]

[74] NFGD St. 10-R at 79:1-5.
[75] OCA St. 3 at 10-14.

Q. DOES ELEVATED MACROECONOMIC UNCERTAINTY NECESSARILY SUPPORT MR. NOWAK'S 11.00% BASE ROE?

A. No. Elevated uncertainty must be evaluated through market-based cost of equity evidence, not assumed to require an upward adjustment. I explained that in uncertain times investors may choose more defensive stocks, such as utility stocks, that typically have lower expected returns than higher-risk stocks, and that this trend is reflected in my cost of equity study estimates.[76] My recommendation already accounts for the current market environment through my DCF and CAPM analyses.

XIV. AFFORDABILITY AND CUSTOMER BURDEN

Q. DOES YOUR DISCUSSION OF MACROECONOMIC AND FINANCIAL MARKET CONDITIONS ALSO INFORM THE COMMISSION'S CONSIDERATION OF CUSTOMER AFFORDABILITY?

A. Yes. My discussion of macroeconomic and financial market conditions is relevant not only to investor-required returns, but also to the affordability context in which the Commission must set just and reasonable rates. I have evaluated inflation, interest rates, Treasury yields, corporate bond yields, and broader uncertainty through market-based cost-of-equity evidence, rather than assuming that uncertainty automatically supports a higher ROE. At the same time, those same economic conditions affect residential

[76] *Id.* at 20:1-8.

customers who must absorb utility rate increases along with higher costs for food, housing, transportation, and other necessities.[77]

Q. HOW DOES THE OCA AFFORDABILITY TESTIMONY RELATE TO YOUR RATE OF RETURN RECOMMENDATION?

A. The affordability testimony reinforces the importance of authorizing only the return that is necessary to satisfy the *Hope* and *Bluefield* standards. OCA Witness Michael Deupree explains that NFGD's requested increase follows a recent rate increase and would contribute to cumulative rate pressure on customers, including evidence that terminations and reconnections increased in 2025.[78] He also explains that affordability concerns are especially acute for low-income households.[79] Those facts do not replace the cost-of-capital analysis, but they do matter when the record supports a lower, reasonable cost of capital than what the Company requests.

Q. WHAT DOES MR. DEUPREE'S AFFORDABILITY ANALYSIS SHOW FOR LOW-INCOME RESIDENTIAL CUSTOMERS?

A. Mr. Deupree's analysis shows that low-income customers already face high energy burdens. Using the 6.0% affordability threshold, he estimates that the Company's proposed rate increase would raise the energy burden to approximately 8.5% for residential customers at 50.0% of the Federal Poverty Income Guidelines ("FPIG") and 4.3% for customers at 100% of FPIG.[80] Mr. Deupree concludes that the proposed

[77] OCA St. 1 at 3:9-20.
[78] *Id.* at 9.
[79] *Id.* at 3-6.
[80] OCA St. 1-SR at 5.

increase in rates would worsen affordability conditions for the most vulnerable customers.

Q. CAN AN AUTHORIZED CAPITAL STRUCTURE AND ROE BE USED TO REDUCE CUSTOMER BURDEN?

A. Yes. The authorized capital structure and ROE are core drivers of the revenue requirement. Equity is more expensive than debt, and a higher equity ratio increases the weighted cost of capital paid by customers. In addition, equity returns are recovered from customers and grossed up for income taxes, while interest on debt is tax deductible. For that reason, adopting a more balanced capital structure and a lower, market-supported ROE can reduce the revenue requirement without disallowing prudent investment.

Q. IS THE CAPITAL STRUCTURE ONE WAY THE COMMISSION CAN REDUCE CUSTOMER BURDEN WHILE STILL PROVIDING THE COMPANY A FAIR RETURN?

A. Yes. My recommended 9.74% ROE is market-based and already reflects current financial conditions through my DCF analysis and CAPM check. It is not an affordability discount. Rather, it is the fair return supported by the record. Because the Company has not shown that NFGD faces materially greater risk than the proxy group, customers should not be required to pay the Company's requested 11.00% ROE or the higher return produced by its equity-heavy capital structure.

Q. ARE YOUR RECOMMENDATIONS CONSISTENT WITH THE OTHER OCA WITNESSES' AFFORDABILITY RECOMMENDATIONS?

A. Yes. My recommendations complement the OCA's broader affordability position. Mr. Deupree recommends that the Commission require shared burden in light of current macroeconomic conditions and reject the Company's rate design proposals, such as increasing the residential basic service charge from $14 to $19 per month and making the WNA permanent , that would increase burdens on low-use or vulnerable customers. OCA Witness Brian Andrews recommends the Average Life Group ("ALG") depreciation procedure, which provides near-term customer relief while still allowing full recovery of prudent investment.[81] My ROE and capital structure recommendations serve the same ratemaking purpose: reducing unnecessary customer burden while preserving the Company's opportunity to earn a fair return.

XV. CONCLUSION

Q. WHAT SHOULD THE COMMISSION CONCLUDE REGARDING MR. NOWAK'S AND MR. WELCH'S REBUTTAL TESTIMONY?

A. The Commission should reject Mr. Nowak's and Mr. Welch's criticisms of my direct testimony. Mr. Nowak's proposed "corrections" remove reasonable DCF growth inputs, narrow my CAPM evidence to higher selected inputs, and reject the Hamada-model implication of lower leverage risk under the Company's proposed capital structure. Mr. Welch's rebuttal does not rebut the customer-cost concern created by NFGD's proposed 56.40% equity ratio, does not show that the proposed equity ratio is reasonable

[81] OCA St. 4-SR at 2.

compared with recent gas utility authorized equity ratios or the expected proxy group average and median, and does not eliminate the relevance of parent-company financing considerations.

Q. WHAT SHOULD THE COMMISSION CONCLUDE?

A. The Commission should view affordability and cost of capital together, not as separate issues. The record shows that customers are facing real affordability pressures, and the cost-of-capital record provides concrete ways to mitigate those pressures without undermining NFGD's financial integrity.

Q. WHAT RECOMMENDATION DO YOU CONTINUE TO MAKE?

A. I continue to recommend an overall ROR of 7.66%, consisting of a 50.00% equity / 50.00% long-term debt capital structure, a 5.58% cost of long-term debt, and a 9.74% ROE. My 9.74% ROE recommendation remains the midpoint of the DCF range and is supported by the CAPM check. If the Commission accepts NFGD's proposed 56.40% equity / 43.60% debt capital structure, it should adopt my alternative 9.06% ROE and 7.54% ROR.

Q. DOES THIS CONCLUDE YOUR TESTIMONY AT THIS TIME?

A. Yes.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission

v. Docket No. R-2025-3059428

National Fuel Gas Distribution Corp.
:

VERIFICATION

I, Maureen L. Reno, hereby state that the facts above set forth in my Surrebuttal Testimony, OCA Statement 3SR, are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

DATED: May 27, 2026 Signature:
Maureen L. Reno

Address:

Reno Energy Consulting Services, L.L.C.
19 Hope Hill Road,
Derry, New Hampshire 03038

Schedule MLR-1-SR: Rate Case History (Past Rate Cases)

State	Company	Parent Company Ticker	Docket	Rate Case Service Type	Case Type	Date of Increase Requested	Rate Increase ($M)	Return on Original Cost Rate (%)	Return on Equity (%)	Request Common Equity to Total Capital (%)	Rate Base ($M)	Date of Increased Authorized	Decision Type	Rate Increase ($M)	Phase-In?	Interim Authorized?	Return on Original Cost Rate (%)	Return on Equity (%)	Allowed Common Equity to Total Capital (%)	Rate Case Test Year End Date	Rate Base ($M)	Rate Base Valuation Method	Rate Case Duration (months)
Arizona	Southwest Gas Corp.	SWX	D-G-01551A-21-0368	Natural Ga	Distributio	12/3/2021	90.7	7.08	9.90	51.00	2,642.07	1/23/2023	Settled	54.3	No	No	6.73	9.30	50.00	08/2021	2,607.57	Year-end	13
Connecticı	The United Illuminating Co.	IBE	D-22-08-08	Electric	Distributio	9/9/2022	130.6	7.47	10.20	52.00	1,539.10	8/25/2023	Fully Litiga	23.0	No	No	6.48	8.63	50.00	12/2023	1,105.20	Average	11
Idaho	Avista Corp.	AVA	C-AVU-E-25-01	Electric	Vertically Ir	1/31/2025	60.7	7.68	10.40	50.00	NA	8/29/2025	Settled	34.2	Yes	No	7.28	9.60	50.00	06/2024	1,197.68	Average	7
Idaho	Avista Corp.	AVA	C-AVU-G-25-01	Natural Ga:	Distributior	1/31/2025	9.8	7.68	10.40	50.00	NA	8/29/2025	Settled	4.4	Yes	No	7.28	9.60	50.00	06/2024	236.87	Average	7
Idaho	Avista Corp.	AVA	C-AVU-E-23-01	Electric	Vertically Ir	2/1/2023	50.6	7.59	10.25	50.00	1,069.80	8/31/2023	Settled	26.4	Yes	No	7.19	9.40	50.00	06/2022	1,034.88	Average	7
Idaho	Avista Corp.	AVA	C-AVU-G-23-01	Natural Ga:	Distributior	2/1/2023	2.9	7.59	10.25	50.00	211.17	8/31/2023	Settled	1.3	Yes	No	7.19	9.40	50.00	06/2022	206.56	Average	7
Idaho	Avista Corp.	AVA	C-AVU-E-21-01	Electric	Vertically Ir	1/29/2021	33.5	7.30	9.90	50.00	901.08	9/1/2021	Settled	18.6	Yes	No	7.05	9.40	50.00	12/2019	869.81	Average	7
Idaho	Avista Corp.	AVA	C-AVU-G-21-01	Natural Ga:	Distributior	1/29/2021	1.0	7.30	9.90	50.00	174.71	9/1/2021	Settled	(0.7)	Yes	No	7.05	9.40	50.00	12/2019	172.31	Average	7
Idaho	Intermountai n Gas Co.	MDU	C-INT-G-25-02	Natural Ga:	Distributior	5/30/2025	26.5	7.86	10.80	50.00	578.47	12/30/2025	Settled	13.0	No	No	7.23	9.50	50.00	12/2024	524.77	Average	7
Idaho	Intermountai n Gas Co.	MDU	C-INT-G-22-07	Natural Ga:	Distributior	12/1/2022	11.3	7.37	10.30	50.00	387.51	6/30/2023	Settled	3.1	No	No	6.97	9.50	50.00	12/2022	385.29	Average	7
Illinois	Ameren Illinois	AEE	D-25-0084	Natural Ga	Distributio	1/8/2025	128.8	7.73	10.70	52.00	3,254.89	11/19/2025	Fully Litiga	72.9	No	No	7.05	9.60	50.00	12/2026	3,155.20	Average	10
Illinois	Ameren Illinois	AEE	D-23-0082	Electric	Distributio	1/20/2023	465.1	7.76	10.50	54.03	5,193.86	12/14/2023	Fully Litiga	309.4	Yes	No	6.59	8.72	50.00	12/2027	4,803.78	Average	10
Illinois	Ameren Illinois	AEE	D-23-0067	Natural Ga	Distributio	1/6/2023	148.2	7.53	10.30	53.99	2,894.03	11/16/2023	Fully Litiga	111.8	No	No	6.85	9.44	50.00	12/2024	2,841.68	Average	10
Illinois	Ameren Illinois	AEE	D-22-0297	Electric	Distributio	4/14/2022	85.9	6.06	7.85	53.99	3,891.16	12/1/2022	Fully Litiga	63.1	No	No	5.90	7.85	50.00	12/2021	3,890.34	Year-end	7
Illinois	Commonwe alth Edison Co.	EXC	D-23-0055	Electric	Distributio	1/17/2023	1,487.4	7.65	10.65	51.19	18,330.80	12/14/2023	Fully Litiga	1,053.5	Yes	No	6.71	8.91	50.00	12/2027	17,330.86	Average	11
Illinois	Northern Illinois Gas Co.	SO	D-25-0055	Natural Ga	Distributio	1/3/2025	314.3	7.52	10.35	54.59	6,803.15	11/19/2025	Fully Litiga	167.8	No	No	6.90	9.60	50.00	12/2026	6,545.10	Average	10
Illinois	Northern Illinois Gas Co.	SO	D-23-0066	Natural Ga	Distributio	1/3/2023	320.0	7.49	10.35	54.52	6,184.64	11/16/2023	Fully Litiga	223.0	No	No	6.68	9.51	50.00	12/2024	5,971.92	Average	10
Maine	Central Maine Power Co.	IBE	D-2022-00152	Electric	Distributio	8/11/2022	43.5	7.14	10.20	50.00	1,200.98	6/6/2023	Settled	67.0	Yes	No	6.74	9.35	50.00	NA	NA	NA	9
Maine	Versant Power		D-2023-00336	Electric	Distributio	3/1/2024	36.1	6.84	9.35	50.00	646.09	3/13/2025	Fully Litigat	32.3	No	No	6.84	9.35	50.00	06/2023	641.96	Average	12
Mississipp	Atmos Energy Corp.	ATO	D-2025-UN-59	Natural Ga	Distributio	6/2/2025	56.1	7.93	10.41	60.00	1,389.66	11/4/2025	Fully Litiga	(21.9)	No	No	6.80	9.40	50.00	12/2024	1,137.92	Year-end	5
Nebraska	Black Hills Nebraska Gas LLC	BKH	D-NG-109	Natural Ga:	Distributior	6/1/2020	15.7	6.96	10.00	50.00	503.79	1/26/2021	Settled	10.7	No	Yes	6.71	9.50	50.00	12/2019	502.65	Year-end	7
New Hamp	Public Service Co. NH	ES	D-DE-24-070	Electric	Distributio	6/11/2024	215.8	7.44	10.30	53.85	2,407.85	7/25/2025	Fully Litiga	100.7	Yes	Yes	6.80	9.50	50.00	12/2023	NA	Year-end	13

Nevada	Southwest Gas Corp.	SWX	D-23-09012 (Northern	Natural Ga	Distributior	9/11/2023	10.5	7.26	10.00	50.00	227.06	4/8/2024	Settled	8.7	No	No	7.01	9.50	50.00	05/2023	NA	Year-end	7
Nevada	Southwest Gas Corp.	SWX	D-23-09012 (Southern	Natural Ga	Distributior	9/11/2023	63.5	7.25	10.00	50.00	1,780.73	4/8/2024	Settled	50.4	No	No	7.00	9.50	50.00	05/2023	NA	Year-end	7
Nevada	**Southwest Gas Corp.**	**SWX**	**D-21-09001 (Souther**	**Natural Ga**	**Distributio**	**9/1/2021**	**24.2**	**6.61**	**9.90**	**51.00**	**1,539.70**	**3/22/2022**	**Settled**	**12.8**	**No**	**No**	**NA**	**9.40**	**50.00**	**NA**	**NA**	**NA**	**6**
Nevada	**Southwest Gas Corp.**	**SWX**	**D-21-09001 (Northern**	**Natural Ga**	**Distributio**	**9/1/2021**	**2.9**	**6.87**	**9.90**	**51.00**	**177.38**	**3/22/2022**	**Settled**	**1.3**	**No**	**No**	**NA**	**9.40**	**50.00**	**NA**	**NA**	**NA**	**6**
New York	Central Hudson Gas & Electric	FTS	C-20-E-0428	Electric	Distributior	8/27/2020	32.8	6.61	9.10	50.00	1,277.94	11/18/2021	Settled	(3.0)	Yes	No	6.48	9.00	50.00	06/2022	1,278.94	Average	14
New York	Central Hudson Gas & Electric	FTS	C-20-G-0429	Natural Ga	Distributior	8/27/2020	14.4	6.61	9.10	50.00	538.76	11/18/2021	Settled	4.6	Yes	No	6.48	9.00	50.00	06/2022	547.37	Average	14
Oregon	Avista Corp.	AVA	D-UG-519	Natural Ga	Distributior	11/1/2024	7.8	7.67	10.40	50.00	389.38	5/23/2025	Settled	4.2	No	No	7.22	9.50	50.00	08/2026	389.38	Average	6
Oregon	Avista Corp.	AVA	D-UG-461	Natural Ga	Distributior	3/1/2023	11.0	7.59	10.25	50.00	351.28	10/26/2023	Settled	7.2	No	No	7.24	9.50	50.00	12/2024	340.34	Average	7
Oregon	Avista Corp.	AVA	D-UG 433	Natural Ga	Distributior	10/22/2021	3.8	7.35	9.90	50.00	315.96	8/2/2022	Settled	1.6	No	No	7.05	9.40	50.00	08/2023	315.96	Average	9
Oregon	Cascade Natural Gas Corp.	MDU	D-UG 390	Natural Ga	Distributior	3/31/2020	4.5	7.08	9.40	50.00	132.61	1/6/2021	Settled	3.2	No	No	7.07	9.40	50.00	12/2020	130.10	Average	9
Oregon	**Idaho Power Co.**	**IDA**	**D-UE-426**	**Electric**	**Vertically I**	**12/15/2023**	**10.7**	**7.81**	**10.40**	**51.00**	**188.95**	**9/23/2024**	**Settled**	**6.7**	**No**	**No**	**7.30**	**9.50**	**50.00**	**12/2024**	**NA**	**Average**	**9**
Oregon	**Northwest Natural Gas Co.**	**NWN**	**D-UG-520**	**Natural Ga**	**Distributio**	**12/30/2024**	**59.3**	**7.66**	**10.40**	**52.00**	**2,293.51**	**10/24/2025**	**Settled**	**21.3**	**No**	**No**	**7.12**	**9.50**	**50.00**	**10/2026**	**223.40**	**NA**	**9**
Oregon	Northwest Natural Gas Co.	NWN	D-UG-490	Natural Ga	Distributior	12/29/2023	152.3	7.41	10.10	50.00	2,123.96	10/25/2024	Settled	95.0	No	No	7.06	9.40	50.00	10/2025	2,090.00	Average	10
Oregon	Northwest Natural Gas Co.	NWN	D-UG-435	Natural Ga	Distributior	12/17/2021	78.0	6.89	9.50	50.00	1,780.96	10/24/2022	Settled	62.7	No	No	6.84	9.40	50.00	10/2023	1,772.20	Average	10
Oregon	PacifiCorp	BRK.A	D-UE-433	Electric	Vertically Ir	2/14/2024	208.8	7.47	9.65	50.00	5,210.37	12/19/2024	Fully Litigat	139.7	No	No	7.40	9.50	50.00	12/2025	NA	Year-end	10
Oregon	PacifiCorp	BRK.A	D-UE-399	Electric	Vertically Ir	3/1/2022	86.4	7.37	9.80	52.25	NA	12/16/2022	Settled	51.4	No	No	7.11	9.50	50.00	12/2023	4,187.30	Average	9
Oregon	Portland General Electric Co.	POR	D-UE-435	Electric	Vertically Ir	2/29/2024	249.9	7.07	9.50	50.00	NA	12/20/2024	Fully Litigat	100.0	No	No	6.99	9.34	50.00	12/2025	6,800.00	Year-end	9
Oregon	Portland General Electric Co.	POR	D-UE-416	Electric	Vertically Ir	2/15/2023	344.2	7.06	9.80	50.00	6,290.49	12/18/2023	Settled	385.9	No	No	6.99	9.50	50.00	12/2024	6,174.11	Average	10
Oregon	Portland General Electric Co.	POR	D-UE-394	Electric	Vertically Ir	7/9/2021	30.7	6.81	9.50	50.00	NA	4/25/2022	Settled	10.0	No	No	6.81	9.50	50.00	12/2022	5,559.09	Average	9
Washingto	**Puget Sound Energy Inc.**		**D-UE-240004**	**Electric**	**Vertically I**	**2/15/2024**	**588.0**	**7.99**	**10.50**	**51.00**	**7,416.99**	**1/15/2025**	**Fully Litiga**	**529.9**	**Yes**	**No**	**7.64**	**9.90**	**50.00**	**06/2023**	**7,909.20**	**Average**	**11**
Washingto	**Puget Sound Energy Inc.**		**D-UG-240005**	**Natural Ga**	**Distributio**	**2/15/2024**	**224.8**	**7.99**	**10.50**	**51.00**	**2,863.13**	**1/15/2025**	**Fully Litiga**	**130.9**	**Yes**	**No**	**7.64**	**9.90**	**50.00**	**06/2023**	**2,860.13**	**Average**	**11**

Source: S&P Capital IQ: Regulatory Research Associates, Past Rates Database

Schedule MLR-2-SR. Hamada Model
Unlevering Beta

Proxy Debt Ratio	52.00%	[1]
Proxy Equity Ratio	48.00%	[2]
Proxy Debt / Equity Ratio	108.33%	[3]
Tax Rate	26.52%	[4]
Average Equity Risk Premium	6.23%	[5]
Risk-free Rate	4.76%	[6]
Proxy Group Beta	0.79	[7]
Unlevered Beta	0.44	[8]

[9]	[10]	[11]	[12]

Relevered Betas and Cost of Equity Estimates

Debt Ratio	D/E Ratio	Levered Beta	Cost of Equity
0.0%	0.00	0.44	7.50%
20.0%	0.25	0.52	8.00%
25.0%	0.33	0.55	8.17%
30.0%	0.43	0.58	8.36%
43.6%	0.77	0.69	9.06%
52.0%	1.08	0.79	9.68%
60.0%	1.50	0.92	10.52%

[1] Proxy group average debt ratio. Note that the average actual long-term debt ratio is 51.57. Here I assume that the debt ratio includes both long-term and short-term debt and equals 52.00%.

[2] Proxy group average equity ratio

[3] = [1] / [2]

[4] Company assumed tax rate = 0.21 X (1-0.0699)+0.0699 = 0.2652

[5] Equity risk premium from Exhibits MLR-7.

[6] Risk-free rate from Exhibits MLR-7a and MLR-7c.

[7] Average proxy beta from Exhibit MLR-7b.

[8] = [7] / (1 + (1 - [4]) * [3])

[9] Various debt ratios (Reno proposed highlighted)

[10] = [9] / (1 - [9])

[11] = [8] * (1 + (1 - [4]) * [10])

[12] = [6] + [11] * [5]

Schedule MLR-3-SR. OCA Proposed Alternative Weighted Average Cost of Capital National Fuel Gas Distribution Corporation			
	Weight	**Cost of Capital**	**Weighted Average Cost**
Long-Term Debt	43.60%	5.58%	2.43%
Common Equity	56.40%	9.06%	5.11%
Total Capitalization	100.00%		7.54%

Source: National Fuel Exhibit A: B-6 and B-7. Weighted average debt cost figure does not match written testimony (Nowak Direct, at 55) due to rounding.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	)	
	)	
v.	)	**R-2025-3059428**
	)	
National Fuel Gas Distribution Corporation	)	

Direct Testimony and Exhibits of

Brian C. Andrews

OCA Statement 4

On behalf of

Pennsylvania Office of Consumer Advocate

Date Served: April 16, 2026

BRUBAKER & ASSOCIATES, INC.

Project 12029

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	)	
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National Fuel Gas Distribution Corporation	)	

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	)	
v.	)	**R-2025-3059428**
National Fuel Gas Distribution Corporation	)	

Direct Testimony of Brian C. Andrews

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A Brian C. Andrews. My business address is 16690 Swingley Ridge Road, Suite 140, Chesterfield, MO 63017.

Q WHAT IS YOUR OCCUPATION?

A I am a consultant in the field of public utility regulation and a Principal with the firm of Brubaker & Associates, Inc. ("BAI"), energy, economic and regulatory consultants.

Q PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A This information is included in Appendix A to my testimony.

Q ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?

A I am appearing on behalf of the Pennsylvania Office of Consumer Advocate ("OCA").

Q HAVE YOU TESTIFIED BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION ("COMMISSION") IN PRIOR PROCEEDINGS?

A Yes, I have. I provided testimony in Dockets R-2024-3047068 (FirstEnergy Pennsylvania Electric Co), R-2024-3046519 (Columbia Gas of Pennsylvania), and R-2024-3047822 / R-2024-3047824 (Aqua Pennsylvania, Inc.), on behalf of the OCA and Large User Groups.

Q PLEASE GIVE A BRIEF OVERVIEW OF YOUR TESTIMONY.

A My testimony will provide a brief overview of the case and discuss various aspects of National Fuel Gas Distribution Corporation's ("National Fuel" or the "Company") proposed depreciation rates. I show that National Fuel has greatly overstated its proposed depreciation rates and recommend adjusting the proposed depreciation rates and test year depreciation expense downward by more than $4 million. The reduction is the result of using the Average Life Group ("ALG") (also known as the Broad Group) procedure rather than the Equal Life Group ("ELG") procedure.

My silence in regard to any issue should not be construed as an endorsement of or acquiescence to National Fuel's position.

CASE OVERVIEW

Q PLEASE DESCRIBE THE RATE INCREASE THAT NATIONAL FUEL GAS DISTRIBUTION CORPORATION FILED.

A On January 28, 2026, the Company filed Supplement No. 294 to National Fuel Gas Distribution Corporation Gas Tariff – PA P.U.C. No. 9 ("Supplement No. 294") seeking approval to increase base rates by $19.7 million. The Company is seeking this rate

increase due to inflationary pressures and investments in infrastructure replacement and system modernization.[1]

SUMMARY OF RECOMMENDATIONS

Q PLEASE SUMMARIZE YOUR CONCLUSIONS AND RECOMMENDATIONS.

A My conclusions and recommendations are as follows:

1. National Fuel has filed a depreciation study based on plant balances for its Fully Projected Future Test Year ("FPFTY") as of October 31, 2027, using the ELG procedure. These depreciation rates would result in excessive and burdensome depreciation expense for National Fuel's customers.

2. National Fuel's total proposed 2027 depreciation expense of $23.4 million represents 8% of its proposed total $285.2 million revenue requirement.

3. National Fuel is in an accelerated investment period that will substantially drive an increase to rate base and revenue requirement.

4. The use of the ALG procedure can be used to mitigate the rate increases associated with National Fuel's accelerated investment to upgrade its infrastructure. The ALG equitably spreads the annual depreciation expense on rate base investment over the generations of customers that receive service from the investments. Conversely, the ELG method assigns more depreciation expense to customers that take service early in the asset's service life and reduces the expense to customers toward the end of the asset's service life.

5. The PUC should order National Fuel to use depreciation rates that are based on the ALG procedure.

6. The proposed test year depreciation expense would be reduced by $4.67 million if the ALG depreciation rates are utilized.

7. The PUC should approve the depreciation rates that are presented in Exhibit BCA-2.

[1]National Fuel Statement No. 1 at page 6, line 19 through page 7, line 5.

DEPRECIATION OVERVIEW

Q PLEASE PROVIDE A GENERAL OVERVIEW OF DEPRECIATION.

A Depreciation expense and accumulated depreciation are both accounting entries on a utility's books that refer to the gradual reduction of an asset's value over time. The main difference between the two is where they are reported on financial statements and how they are recognized and used for purposes of setting a utility's overall revenue requirement for ratemaking purposes:

- Depreciation expense is reported in a utility's income statement and shows the use of the assets to provide utility service over an annual period and is included in the calculation of the utility's overall revenue requirement.

- Accumulated depreciation is the total depreciation expense recorded to date, less recorded retirements and cost of removal, plus recorded gross salvage. Accumulated depreciation is reported on a utility's balance sheet as a contra asset, meaning it is paired with the fixed asset account for allowed utility plant-in-service (*i.e.*, rate base) and functions to reduce the value of allowed utility plant-in-service to determine the net book value of plant-in-service. The net book value of rate base is multiplied by the utility's authorized rate of return and the product is included in the calculation of the utility's overall revenue requirement.

Generally speaking, depreciation expense accounting provides for the recovery of the original cost of the utility's assets that are currently providing service – this capital recovery generally occurs over the remaining service life of the investment or assets.

BOOK DEPRECIATION CONCEPTS

Q PLEASE EXPLAIN THE PURPOSE OF BOOK DEPRECIATION ACCOUNTING.

A Book depreciation is the recognition in a utility's income statement of the consumption or use of assets to provide utility service. Book depreciation is recorded as an expense

and is included in the ratemaking formula to calculate the utility's overall revenue requirement.

The basic underlying principle of utility depreciation accounting is intergenerational equity, where the customers/ratepayers who benefit from the service of assets pay all the costs for those assets during the benefit period, which is over the life of those assets.[2] This concept of intergenerational equity can be achieved through depreciation by allocating costs to customers in a systematic and rational manner that is consistent with the period of time in which customers receive the service value.[3]

Book depreciation provides for the recovery of the original cost of the utility's assets that are currently providing service. Book depreciation expense is not intended to provide for replacement of the current assets, but provides for capital recovery or return of current investment. Generally, this capital recovery occurs over the average service life of the investment or assets. As a result, it is critical that appropriate average service lives be used to develop the depreciation rates so no generation of ratepayers is disadvantaged.

In addition to capital recovery, depreciation rates also contain a provision for net salvage. Net salvage is simply the scrap or reuse value less the removal cost of the asset being depreciated. Accordingly, a utility will also recover the net salvage costs over the useful life of the asset. However, in Pennsylvania, net salvage is not included in the calculation of depreciation rates.

[2]Edison Electric Institute, Introduction to Depreciation for Public Utilities and Other Industries, April 2013, page viii.

[3]*Id.* at 22.

Q PLEASE FURTHER EXPLAIN NET SALVAGE.

A Net salvage is simply the value received from the sale or reuse of retired property (salvage value), less the cost of retiring such property (cost of removal). Net salvage can be either positive or negative. If the salvage value exceeds the cost of removal, the net salvage is positive. If the cost of removal is greater than the salvage value received as a result of retirement, the resulting net salvage is negative. For most utilities, negative net salvage is a significant component of its depreciation rates and expense.

Q ARE THERE ANY DEFINITIONS OF DEPRECIATION ACCOUNTING THAT ARE UTILIZED FOR RATEMAKING PURPOSES?

A Yes. One of the most quoted definitions of depreciation accounting is the one contained in the Code of Federal Regulations ("CFR"):

> Depreciation, as applied to depreciable gas plant, means the loss in service value not restored by current maintenance, incurred in connection with the consumption or prospective retirement of gas plant in the course of service from causes which are known to be in current operation and against which the utility is not protected by insurance. Among the causes to be given consideration are wear and tear, decay, action of the elements, inadequacy, obsolescence, changes in the art, changes in demand and requirements of public authorities, and, in the case of natural gas companies, the exhaustion of natural resources.[4]

Effectively, depreciation accounting provides for the recovery of the original cost of an asset over its useful life.

[4] 18 CFR, Chapter I, Subchapter F, Part 201(12)(B).

Q HOW DO DEPRECIATION RATES AFFECT A UTILITY'S REVENUE REQUIREMENT?

A Depreciation expense is typically one of the largest single line items in a utility's overall revenue requirement that is ultimately recovered through tariff rates. When a utility updates its depreciation rates, it is effectively updating the amount of capital that is returned to it each year for investments that have been made to provide utility service. The depreciation rates are calculated in a depreciation study. The resulting depreciation rates are then applied to test year plant balances to determine the depreciation expense component of the utility revenue requirement.

Q HOW ARE DEPRECIATION RATES DETERMINED?

A Depreciation rates are determined in a depreciation study using a depreciation system. There are three components, each with a number of variations, used to determine a depreciation system, which is then used to estimate depreciation rates. The three basic components are: (1) methods, (2) procedures, and (3) techniques. The choice of a depreciation system can significantly affect the resulting depreciation rates, thus, the revenue requirement.

Q PLEASE FURTHER DESCRIBE THE METHODS THAT ARE USED IN A DEPRECIATION SYSTEM.

A There generally are three types of methods of spreading depreciation expense over the life of property. These are the Straight-Line Method, accelerated methods, and deferred methods. The Straight-Line Method is the method most widely used by utility

companies for accounting and ratemaking purposes as it is easy to apply and does not create intergenerational inequities because it spreads an equal portion of the plant cost across each accounting period. Accelerated methods result in higher depreciation rates earlier in an asset's life, and lower depreciation rates later. Deferred methods have increasing rates over an asset's life.

Q PLEASE DESCRIBE THE GROUPING PROCEDURES THAT ARE USED IN A DEPRECIATION SYSTEM.

A There are four main grouping procedures used in a depreciation system. These four procedures are the Individual procedure, the Broad Group (more commonly known as the ALG), the Vintage Group, and the ELG.

In the ALG procedure, all units within a particular account or category are assumed to be part of a single group that exhibits the same life and retirement characteristics. This is the most commonly utilized procedure nationwide.

The Vintage Group and the ELG procedure assume that sub-groups within a particular account or category may exhibit unique life characteristics. As an example of the Vintage Group procedure, it may assume that all services installed in 1985 have a 50-year life, while all services installed in year 1995 have a 45-year life. The ELG procedure may assume that all services that will attain a life of 50 years should have one depreciation rate while services that only attain life spans of 45 years would have a different depreciation rate. The overall group depreciation rate for the account would be a composite of the ELG and vintage depreciation rates.

Q PLEASE FURTHER DESCRIBE THE TECHNIQUES THAT ARE USED IN A DEPRECIATION SYSTEM.

A There are two techniques used to calculate depreciation rates: Whole Life and Remaining Life. The Whole Life Technique spreads the original cost plus net salvage of the account over the average life of the account. This technique requires that separate amortizations be made to correct for over- and under-accumulations due to changes in an account's average service life.

The Remaining Life Technique spreads the unrecovered cost plus net salvage over the remaining life of the account. The Remaining Life Technique is the most common technique used and it has a self-correcting nature that spreads any over- or under-accumulations over the remaining life.

Q IN YOUR EXPERIENCE, WHAT DEPRECIATION SYSTEM IS MOST COMMONLY UTILIZED TO DETERMINE UTILITY DEPRECIATION RATES FOR RATEMAKING PURPOSES?

A The most common depreciation system is one that consists of the Straight-Line Method, the ALG procedure, and the Remaining Life Technique.

Q WHAT ARE SURVIVOR CURVES AND HOW ARE THEY USED IN DEVELOPING DEPRECIATION RATES?

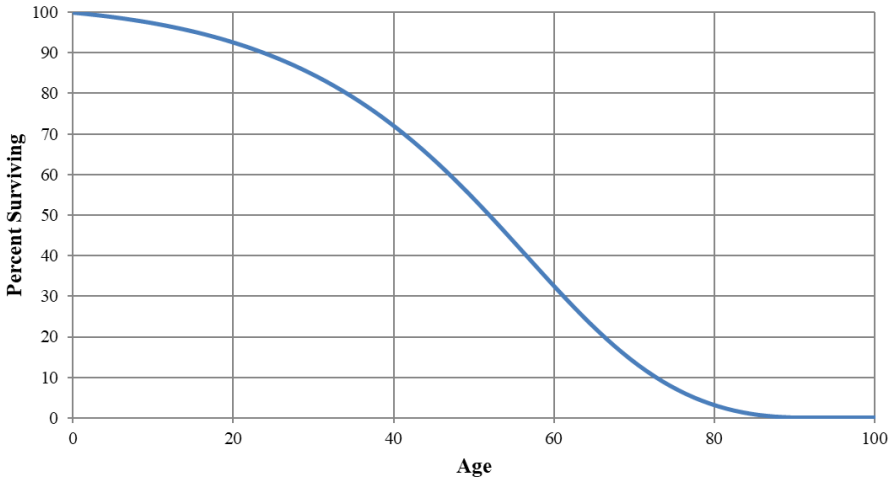
A The selection of the survivor curve is one of the most important decisions in conducting a depreciation study. A survivor curve is a graphical representation of the amount of property existing at each age interval throughout the life of a group of property. From

the survivor curve, parameters required to calculate depreciation rates can be determined, such as the average service life of the group of property and the composite remaining life. For assets with an assumed lifespan or retirement date, the survivor curve is used to estimate the interim retirements that will occur between the study date and the estimated year of final retirement. These parameters directly affect the depreciation rate calculations; therefore, informed judgment should be used in their selection.

In this proceeding, as well as the majority of utility regulatory rate case proceedings throughout the U.S. and Canada, the Iowa Curves are the general survivor curves utilized to describe the mortality characteristics of a group of property. There are four types of Iowa Curves: right-moded (R1, R2, R3, etc.), left-moded (L1, L2, L3, etc.), symmetrical-moded (S1, S2, S3, etc.), and origin-moded (O1, O2, O3, etc.). Each type describes where the greatest frequency of retirements occur relative to the average service life.

A survivor curve consists of an average service life and Iowa Curve type combination. For example, when describing property with a 50-year average service life that has mortality characteristics of the R2 Iowa Curve, the survivor curve would simply be notated as "50-R2." I present the 50-R2 survivor curve in Figure 1 below.

Figure 1
50-R2
Survivor Curve



NATIONAL FUEL'S DEPRECIATION STUDY

Q HAS NATIONAL FUEL PROPOSED NEW DEPRECIATION RATES IN THIS PROCEEDING?

A Yes. National Fuel retained Mr. John Spanos, of Gannett Fleming, to conduct depreciation studies on the Company's property as of September 30, 2025, September 30, 2026, and October 31, 2027. The 2025 Depreciation Study has been filed as National Fuel Exhibit C – Historic, the 2026 Depreciation Study has been filed as National Fuel Exhibit C – Future, and the 2027 Depreciation Study has been filed as National Fuel Exhibit C – Fully Projected.

Q WHAT DEPRECIATION SYSTEM DOES NATIONAL FUEL UTILIZE IN THE CALCULATION OF ITS PROPOSED DEPRECIATION RATES?

A National Fuel used a depreciation system consisting of the Straight-Line Method, the ELG procedure,[5] and the Remaining Life Technique[6] to calculate its proposed depreciation rates.

Q HOW DOES NATIONAL FUEL'S PROPOSED DEPRECIATION RATES IMPACT THE REVENUE REQUIREMENT IN THIS PROCEEDING?

A National Fuel's proposed depreciation rates significantly impact the revenue requirement in this proceeding. As is shown on National Fuel's Exhibit C, National Fuel's total depreciation expense is $23.41 million for the 2027 projected test year, representing 8% of National Fuel's proposed $285.2 million revenue requirement. National Fuel shows that the 2024 depreciation and amortization expense was $20.71 million, meaning a 13% increase in depreciation expense over a three-year period. As I will discuss later, National Fuel's use of the ELG procedure is exacerbating this increase. I summarize the increase by functional group in Table 1 below.

[5]National Fuel uses the ALG procedure for assets installed prior to 1982 and the ELG procedure for assets installed in 1982 and later. The 1982 and later assets represent 92% of its depreciable plant in-service as of September 30, 2025.

[6]National Fuel Statement No. 8 at page 4, line 4 through line 22.

TABLE 1

National Fuel Annual Depreciation Expense
($ Millions)

Group	Current 7/31/2024	Proposed 10/31/2027	Delta Amount	Delta Percent
Intangible	$ 2.13	$ 0.35	$ (1.78)	-83.6%
Production	$ 0.11	$ 0.15	$ 0.03	31.1%
Transmission	$ 1.27	$ 1.90	$ 0.63	49.9%
Distribution	$ 12.92	$ 14.89	$ 1.97	15.3%
General	$ 4.28	$ 6.13	$ 1.86	43.4%
Total Gas Plant	**$ 20.71**	**$ 23.43**	**$ 2.71**	**13.1%**

Sources: Filing Requirement III.K-6, pages 6-7, and Exhibit C, FPFTY, Table 1

Q WHAT IS THE PRIMARY FACTOR DRIVING THE INCREASE TO NATIONAL FUEL'S DEPRECIATION EXPENSE?

A National Fuel is in an accelerated investment cycle. NFG witness Hillery states:

> The investment in net plant in-service for the FPFTY ended October 31, 2027, is projected to be $637 million. When the Company last requested a rate increase for the FPFTY ended July 31, 2024, the Company's investment in net plant was approximately $496 million. The $141 million increase in net plant has largely been the result of continued investments necessary to enhance and maintain the safety and reliability of the Company's distribution system, which include the replacement of aging gas plant infrastructure.[7]

Ms. Hillery also mentions that the Company has "eliminated over 371 miles of leak-prone bare steel and wrought iron pipeline and 7,337 base steel services" since 2016, and at the current rate of replacement of 57 miles per year, the Company anticipates retirement of all leak-prone pipe by 2039.[8] This indicates continued

[7]National Fuel Statement No. 1 at page 14, line 1 through line 7.
[8]*Id.* at page 14, line 7 through line 11.

increased spending is likely to occur for at least the next 10 years. Although National Fuel implemented the Distribution System Improvement Charge ("DSIC") in January 2025, the DSIC is currently capped at 5% of distribution revenues, and the Company anticipates this cap will be met by the end of March 2026.[9]

In Table 2, I show the increase in National Fuel's plant-in-service and depreciation expense from 2023-2027.

TABLE 2

National Fuel Annual Plant in Service and Depreciation Expense
($ Millions)

Description	Currently Approved 2023	Currently Approved 2024	Proposed Parameters 2025	Proposed Parameters 2026	Proposed Parameters 2027	2023 to 2027 Increase	Percent Increase
Total Depreciable Plant in Service	$ 733.78	$ 780.13	$ 823.36	$ 883.40	$ 955.94	$ 222.15	30.27%
Total Depreciation Expense	$ 18.88	$ 20.71	$ 20.59	$ 20.89	$ 23.43	$ 4.55	24.08%

Sources: Filing Requirement III-K.6 and Exhibit C

As can be seen, the depreciation expense has increased over 24% over a 5-year period, largely coinciding with a 30% increase to plant-in-service. Additionally, the oldest assets still in service are from 1883. The Company has been providing gas service in Pennsylvania since 1902, approximately 124 years. Contrast this to the average age of the Company's gas plant, which is just 19 years old. A 124-year-old company with assets with an average age of 19 years further confirms that National Fuel has been in a higher-than-average investment cycle.

[9] *Id.* at page 14, line 13 through line 22.

Q PLEASE FURTHER ELABORATE ON NATIONAL FUEL'S INVESTMENT CYCLE AND THE IMPACT ON RATEPAYERS.

A A changed landscape exists among utility rates. The affordability of utility rates is of significant concern of regulators, credit agencies, and especially customers themselves. A recent poll by the Commonwealth Foundation found that rising energy costs are a top voter concern, claiming that "Eight in 10 voters say their household energy bills have increased over the past two years, and more than two-thirds (70%) say they're concerned about affording their family's energy needs. Rising energy costs (63%) top the list as the most prominent environmental issue in Pennsylvania."[10] The high inflationary environment that has existed over the past few years is taking its toll on Pennsylvanians. The switch to ALG depreciation rates will help alleviate the gas bill burden for National Fuel's customers.

Q DO YOU TAKE ISSUE WITH NATIONAL FUEL'S DEPRECIATION STUDIES?

A Yes. National Fuel's proposed depreciation rates are overstated and unnecessarily burdensome for National Fuel's customers due to excessive depreciation expense and the subsequently inflated revenue requirement. In particular, National Fuel's reliance on the ELG procedure results in depreciation rates that are front-loaded and forces unnecessary depreciation expense on current customers. This compounds the cost of the infrastructure asset in the early years of the asset's service life by increasing both the return on the asset (because undepreciated net plant cost is highest in the early years)

[10] https://www.commonwealthfoundation.org/2024/03/19/pa-voters-energy-costs-2024/.

and the annual recovery of the asset or depreciation expense. Like most other regulatory commissions, the ELG procedure should be rejected by the PUC in favor of the ALG procedure.

Q WHY SHOULD THE PUC REJECT NATIONAL FUEL'S USE OF ELG DEPRECIATION RATES?

A As I will demonstrate, the ELG procedure results in front-loaded depreciation rates that burden customers with unnecessarily high depreciation expense. The vast majority of utilities in the country calculate depreciation rates using the ALG procedure. As far as I am aware, only some Pennsylvania utilities, one Oregon utility, and a few utilities in Texas and Colorado rely on the ELG procedure presently. Utilities in Indiana recently have made the switch to ALG rates due to the Indiana Utility Regulation Commission's ("IURC") finding that "the use of ELG in a higher than average investment cycle has the effect of unnecessarily increasing the near term depreciation expense as compared to the use of ALG."[11] Accordingly, the PUC should reject National Fuel's proposed use of the ELG procedure to calculate depreciation rates and instead order the use of the ALG procedure to mitigate the rate impact of substantial rate base increases.

[11] *Petition of Duke Energy Indiana, LLC Pursuant to Ind. Code § 8-1-2-42.7 and § 8-1-2-61,* Indiana Utility Regulatory Commission ("IURC"), June 29, 2020, IURC Final Order in Docket No. 45253 at page 90, See Exhibit BCA-5.

ELG VS. ALG DEPRECIATION RATES

Q WHAT DEPRECIATION GROUPING PROCEDURE DOES NATIONAL FUEL PROPOSE?

A National Fuel has used the ELG procedure to calculate its proposed depreciation rates. I would note that National Fuel uses the ALG grouping method in its New York jurisdiction and in every other regulated entity under the National Fuel Corporation.

Q WHAT IS THE MOST COMMONLY UTILIZED GROUPING PROCEDURE?

A The most commonly utilized depreciation grouping procedure throughout the nation is the ALG procedure. I have addressed in testimony, or reviewed depreciation studies conducted in approximately half of the states in the USA. In all states where I have experience, except for a few utilities in Texas, Colorado, Oregon, and Pennsylvania, depreciation rates are routinely calculated using the ALG procedure.

Q HOW ARE DEPRECIATION RATES COMPUTED IN THE ELG PROCEDURE?

A When depreciation rates are computed using the ELG procedure, an attempt is made to precisely identify the exact year in which all property will retire and create a depreciation rate that ensures recovery of the property over the computed remaining life. Accordingly, property that will only have a 1-year life (according to a survivor curve) should have 100% depreciation rate; property that will have a 2-year life would have a 50% depreciation rate, property that has a 3-year life would have a 33%

depreciation rate and so on. These are the ELGs, each with a unique depreciation rate to ensure recovery over the life of the ELG.

To be more specific, National Fuel's Depreciation Study was conducted based on 2027 plant balances (the FPFTY in use in this proceeding). Because National Fuel is relying on the ELG procedure, it is essentially claiming it knows exactly how much property will retire in 2028, and established a depreciation rate for that property that ensures all unrecovered investment is recovered in 2028. Similarly, it must know exactly how much property will retire in 2029, 2030, 2031, and every single year in the future. Each ELG for each account will have a unique depreciation rate, in an attempt to recover the cost of those groups over the remaining life. The annual accruals for each ELG are summed to determine the total annual accrual for each account. The depreciation rate would then be equal to the sum of annual accruals divided by the total account balance. The selection of the survivor curve has a significant impact on the amount of property assumed to be in each ELG.

Q HOW ARE DEPRECIATION RATES COMPUTED IN THE ALG PROCEDURE?

A With the ALG procedure, all assets in an account are assumed to have an average life equal to that of the proposed survivor curve. While some property will be retired before the average service life, and some will be retired after the average service life, on average, the property will exhibit life characteristics according to the survivor curve. For each vintage of property within an account, the remaining life is determined based on the age of the property and the survivor curve selected for the account. The

unrecovered cost for each vintage is spread over the remaining life of that vintage, yielding an annual accrual for each vintage. The vintage annual accruals are summed for the entire account, and the total of annual accruals is divided by the account balance to determine the depreciation rate.

Q HAVE YOU CREATED AN EXAMPLE THAT COMPARES THE ELG AND THE ALG PROCEDURES?

A Yes. I have created an example that will demonstrate the differences between the ALG and ELG procedures. It will demonstrate how the rates are calculated under each procedure and will show that the ELG is front-loaded and requires annual updates.

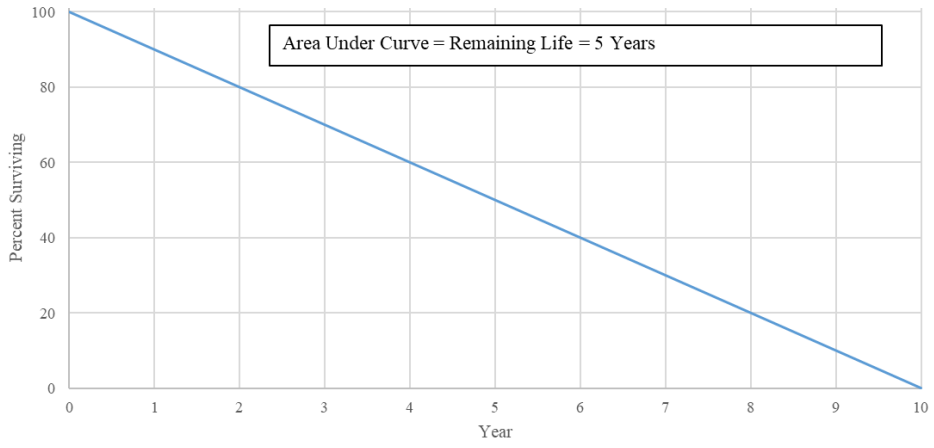
Q WHAT ASSUMPTIONS ARE YOU MAKING IN YOUR EXAMPLE?

A This example assumes that $100,000 of property is placed in-service into an account. It is the first and only property to exist in the account, and it will not be replaced as the initial $100,000 investment retires. The property will retire consistent with the 5-O1 survivor curve and has a 0% net salvage rate. This example will demonstrate how $100,000 will be recovered over the life of the property.

Q PLEASE DESCRIBE THE 5-O1 SURVIVOR CURVE.

A The 5-O1 survivor curve is presented in Figure 2.

Figure 2
5-O1 Survivor Curve



The 5-O1 survivor curve has a 5-year average service life and assumes that all property is retired by year 10. This survivor curve assumes that 10% retires each year, therefore, in this example, it is assumed that $10,000 retires each year.

Q HOW WOULD THE ALG DEPRECIATION RATE BE CALCULATED FROM THE 5-O1 SURVIVOR CURVE?

A In the ALG procedure, the depreciation rate is calculated by ensuring recovery of the investment less net salvage over the remaining service life of the property. In this example, the net salvage rate is 0%, therefore, 100% of the investment needs to be recovered over the average service life, which in this example is 5 years. 100% divided by 5 years equals 20%. Therefore, 20% is the depreciation rate that needs to be in place for 10 years to ensure the recovery of the $100,000 investment and $0 for net salvage over the life of the property.

Q HOW WOULD THE ELG DEPRECIATION RATE BE CALCULATED FROM THE 5-O1 SURVIVOR CURVE?

A With the ELG procedure, a different depreciation rate is needed for each year. The 5-O1 survivor curve in this example yields 10 different ELGs. The first group will have a 1-year life, the second group will have a 2-year life, and so on until the last group, which would have a 10-year life. In the first year, the total depreciation rate would allow for recovery of a portion of all 10 of the ELGs. In the second year, the depreciation rate would recover a portion of all of the ELGs except for the 1-year ELG, which according to the survivor curve is retired. The last year's depreciation rate would only provide for the last annual accrual of the 10-year ELG.

Q CAN YOU PROVIDE A COMPARISON OF THE ANNUAL DEPRECIATION EXPENSE IN YOUR EXAMPLE?

A Yes. In Table 3, below, I provide a comparison of the annual depreciation rates and expense needed to recover the $100,000 investment over its service life, assuming it retires according to the 5-O1 survivor curve and has a 0% net salvage rate.

TABLE 3

Comparison of ALG Procedure and ELG Procedure
Recovery of $100,000 Investment with 0% Net Salvage and 5-O1 Survivor Curve

Year	First of Year Surviving Original Cost	ALG Rate	ALG Expense	ELG Rate	ELG Expense	Delta
1	$ 100,000	20.00%	$ 19,000	34.38%	$ 32,665	$ 13,665
2	90,000	20.00%	17,000	22.74%	19,332	2,332
3	80,000	20.00%	15,000	18.66%	13,998	(1,002)
4	70,000	20.00%	13,000	16.26%	10,570	(2,430)
5	60,000	20.00%	11,000	14.60%	8,030	(2,970)
6	50,000	20.00%	9,000	13.36%	6,010	(2,990)
7	40,000	20.00%	7,000	12.38%	4,332	(2,668)
8	30,000	20.00%	5,000	11.58%	2,896	(2,104)
9	20,000	20.00%	3,000	10.94%	1,641	(1,359)
10	10,000	20.00%	1,000	10.53%	526	(474)
	Total Recovered Investment:		**$ 100,000**		**$ 100,000**	**$ (0)**

Source: BCA WP-2

Q WHAT DOES YOUR EXAMPLE DEMONSTRATE?

A Table 3 above demonstrates how both the ALG and ELG procedures allow for capital recovery of the $100,000 investment over the same 10-year period. The ALG depreciation rate is 20% and held constant through the 10-year period in which this property provides service. The ELG procedure requires a 34.38% depreciation rate in year 1, a 22.74% depreciation rate in year 2, declining until there is a 10.53% depreciation rate in year 10. This example shows how the ELG depreciation rates must be adjusted every year, otherwise significant intergenerational inequities will exist, and more cost will be recovered than is necessary in the first two years. However, in ratemaking, depreciation expense that is included in customer base rates are only updated when the Commission approves new base rates, which means that the year 1

depreciation expense would essentially be fixed in place and utilized as the test year expense until new depreciation rates are approved in a future rate case. In my example above, this would effectively "lock in" depreciation expense based on a 34.38% depreciation rate until new rates are established in a future rate case as opposed to the 20% depreciation rate calculated by the ALG method.

Q PLEASE EXPAND ON YOUR LAST STATEMENT.

A Utilities typically only update their depreciation expense recovered from customers in the context of a base rate case, which is often not an annual occurrence. When depreciation rates for new assets are proposed using the ELG procedure, the rates put forward for approval would be analogous to the year 1 depreciation rate in this example. Therefore, if the ELG method were approved in a depreciation study, given this example and left in place for 10 years, the effective depreciation rate would be 34.38% every year. To be just to consumers and to produce reasonable rates, ELG depreciation rates should be updated each year and the corresponding depreciation expense adjusted in base rates; however, the ELG depreciation rates are not properly implemented and create intergenerational inequities, significantly overcharging customers in base rates based on the higher depreciation rates in the earlier years. Between rate cases, the depreciation expense component of a utility's revenue requirement remains at the level approved in the rate case, so while National Fuel may routinely update its depreciation rates for accounting purposes, the depreciation expense for rate purposes provided by customers remains at the level approved in the most recent rate case. Table 4 shows an example of improperly implemented ELG depreciation rates. This table shows that if

the year 1 ELG rates were left unchanged for the entire 10-year period, the utility would actually recover $71,922, or 72%, more than it is entitled to recover.

TABLE 4

Comparison of ALG Procedure and Improperly Implemented ELG Procedure
Recovery of $100,000 Investment with 0% Net Salvage and 5-O1 Survivor Curve

Year	First of Year Surviving Original Cost	ALG Rate	ALG Expense	ELG Rate	ELG Expense	Delta
1	$ 100,000	20.00%	$ 19,000	34.38%	$ 32,665	$ 13,665
2	90,000	20.00%	17,000	34.38%	29,227	12,227
3	80,000	20.00%	15,000	34.38%	25,788	10,788
4	70,000	20.00%	13,000	34.38%	22,350	9,350
5	60,000	20.00%	11,000	34.38%	18,911	7,911
6	50,000	20.00%	9,000	34.38%	15,473	6,473
7	40,000	20.00%	7,000	34.38%	12,035	5,035
8	30,000	20.00%	5,000	34.38%	8,596	3,596
9	20,000	20.00%	3,000	34.38%	5,158	2,158
10	10,000	20.00%	1,000	34.38%	1,719	719
	Total Recovered Investment:		**$ 100,000**		**$ 171,922**	**$71,922**

Source: BCA WP-2

Q WHY IS IT IMPORTANT TO AVOID INTERGENERATIONAL INEQUITIES?

A As I discussed earlier in my testimony, the underlying principle for determining depreciation rates is to achieve intergenerational equity. Given that traditional ratemaking sets rates on a forward-looking basis based on test year expense and remain in effect until a future rate case, the use of a depreciation system that utilizes the ELG procedure in the test year is at odds with this principle. As my example has clearly demonstrated, the ELG procedure is an accelerated form of depreciation, which causes current customers to pay greater depreciation expense than future customers for the same level of utility service. It is important to note that whichever grouping procedure

is utilized, the utility will recover the full cost of its prudent investments to provide utility service over the life of the assets.

Q SHOULD DEPRECIATION RATES THAT ARE CALCULATED USING THE ELG PROCEDURE BE UPDATED ANNUALLY?

A Yes. The only way for depreciation expense to "accurately" charge customers under the ELG procedure is for the depreciation expense component to be updated and implemented in base rate calculations annually. Otherwise, the depreciation expense that is left in effect will be the high year 1 depreciation rate, as demonstrated in this example. The depreciation expense is also only accurate if the utility property retires in exactly the manner dictated by the survivor curves used to calculate the ELG rates. This precision does not exist in the traditional rate setting paradigm as it would amount to impermissible single-issue ratemaking, which I understand is disfavored in Pennsylvania.

Q WHAT DEPRECIATION GROUPING PROCEDURES DO THE OTHER NATIONAL FUEL COMPANIES UTILIZE?

A Based on National Fuel's response to OCA's 13th Request for Information, Questions OCA 13-1 and 13-2, the depreciation rates for all of National Fuel's regulated utilities, except in Pennsylvania, were determined using the ALG procedure.

Q CAN THE RATE IMPACT OF SUBSTANTIAL INCREASES TO RATE BASE BE MITIGATED WITHOUT UNREASONABLE ADVERSE IMPACT ON THE UTILITY?

A Yes. The rate impact of substantial increases to rate base can be mitigated by depreciating these assets using depreciation rates that are determined using the ALG procedure. The ALG procedure is the most commonly used deprecation procedure in use in the country and is used by National Fuel in other jurisdictions where they operate around the country. The ALG procedure will properly allow National Fuel to recover the full cost of investments over the life of the assets; however, it will be at a more affordable rate and, therefore, reduces the expense in the interest of consumers and allows for more just and reasonable rates.

Q. DOES THE USE OF THE ELG PROCEDURE IMPACT THE REMAINING LIFE OF PROPERTY?

A. Yes. National Fuel's use of ELG significantly understates the remaining life, and thus, the recovery period for its assets.

Q HOW DOES THE ELG UNDERSTATE THE REMAINING LIFE OF NATIONAL FUEL'S ASSETS?

A According to the depreciation study data as of October 31, 2027, the largest single sub-account is Account 376.1 (Mains – Excluding Cathodic Protection). Account 376.1 is $426.7 million, or approximately 45%, of National Fuel's $955.9 million gas plant-in-service. This sub-account represents 32% of National Fuel's proposed 2027

gas plant depreciation expense. By analyzing the 2027 study data, the average age of investment for Account 376.1 is 19.9 years. According to National Fuel, Account 376.1 has an average service life of 70 years. One would expect that something with a lifespan of 70 years and an age of 19.9 years would have a remaining life close to 50 years. The use of the ELG procedure significantly shortens the recovery period for this account. Table 5 below shows the composite remaining life for Account 376.1 under the ELG and ALG procedures.

TABLE 5

Remaining Life of Account 376.1 with ELG vs. ALG
Depreciation Study as of 10/31/2027

Distribution Account	Remaining Life ELG	Remaining Life ALG	Delta
Account 376.1 - Mains - Excluding Cathodic Protection	40.7	55.5	14.8

Sources: Exhibit C, FPFTY and Exhibit BCA-2

As can be seen, with the ELG procedure, the remaining life of Account 376.1 is 40.7 years. With the more commonly used ALG procedure, the remaining life, or recovery period for the investment is 55.5 years. National Fuel's use of the ELG procedure recovers its investment almost 15 years faster than under the ALG. Even though National Fuel supports a 70-year life for these assets, the use of the ELG procedure only gives it an expected life of 60.6 years.[12] This significantly overstates

[12] 19.9 year average age + 40.7 year remaining life = 60.6 year life expectancy.

the depreciation rates, and thus, the depreciation expense. This issue exists for all of National Fuel's depreciable accounts, due to the use of the ELG procedure.

I would note that the ELG procedure produces this result because it subdivides the account into numerous equal life groups, each with a different remaining life, and assigns disproportionate depreciation expense to the shorter-lived groups. The precision of this allocation is entirely dependent on the survivor curve selected for the account. If the actual retirement pattern deviates from the selected survivor curve in any respect, the allocation among equal life groups will not match reality, and the claimed advantage of the ELG procedure over the ALG procedure is undermined.

Q HOW DOES THE USE OF THE ELG OR ALG PROCEDURE IMPACT THE REVENUE REQUIREMENT?

A Generally, the use of the ELG procedure results in a higher revenue requirement in the near-term and the ALG procedure results in a lower revenue requirement. Near-term lower utility bills will certainly help with affordability, which as previously stated, is a top concern for Pennsylvanians. Utility customers do not plan for future utility bills, they pay and plan for bills on a monthly basis not on a decennial basis; most people prefer the next bill to be as low as possible. With the affordability of utility bills of significant concern, the IURC decision in the Duke Energy Indiana case is certainly applicable; it states, "the consideration of service affordability in the near term provides sufficient weight to temper our historical preference for ELG."

Q DO YOU HAVE ADDITIONAL DISCUSSION POINTS RELATED TO THE USE OF THE ELG PROCEDURE?

A Yes, I do. As discussed in authoritative depreciation texts and literature, the ELG procedure is seen as "the only mathematically correct procedure"[13] and the assertion is made that the application of the ELG procedure is "generally considered to better match the consumption of capital with service provided" than use of the ALG procedure.[14]

However, while the ELG method may be more precise mathematically, it is not a precision that exists in reality as it is extremely sensitive to the survivor curve that is used to determine the depreciation rates. The depreciation expense is also only accurate if and only if the utility property retires in exactly the manner dictated by the survivor curves used to calculate the ELG rates. This precision does not exist in real life.

Again, ELG and ALG are grouping procedures for assets in a utility account. There are many different types of assets within each account. For example, Account 376.1, the distribution mains account includes distribution mains of various materials (steel, plastic, etc.) and various sizes (1/2", ¾", 1", etc.). Each individual asset will retire in a different manner and at a different age. The ELG procedure assumes that every asset will retire in a manner exactly like the survivor curve. The ALG procedure assumes, that on average, the group of assets will retire in a manner consistent with the survivor curve. The ALG procedure is more appropriate because the precision of the ELG procedure does not match reality.

[13]Robley Winfrey, Depreciation of Group Properties, Bulletin 155 (Ames, IA: Iowa State University Press, 1942, reprinted 1969); p. 71

[14]Frank K. Wolf and W. Chester Fitch, *Depreciation Systems* (Ames, IA: Iowa State University Press, 1994); p.75

Q DO YOU ANTICIPATE THAT NATIONAL FUEL WILL ARGUE THAT THE ELG PROCEDURE IS SUPPORTED BY LONGSTANDING PENNSYLVANIA PRACTICE?

A Yes, I do. The ELG procedure has been utilized by several Pennsylvania utilities for many years. However, the fact that a procedure has been used for a long period of time does not mean that it remains the most appropriate procedure under current circumstances. Under 52 Pa. Code §73.9(c), the most recently approved depreciation report constitutes a rebuttable presumption as to the reasonableness of accrued depreciation, and the burden of proving unreasonableness falls on the challenging party. I accept that burden in this proceeding.

As I have demonstrated in my testimony, National Fuel is in an accelerated investment cycle, with plant-in-service increasing 30% over five years and continued elevated capital spending projected through at least 2039. The Company implemented a DSIC in January 2025, and the 5% cap on distribution revenues was reached within approximately 14 months, necessitating this rate case. The use of the ELG procedure in this investment environment front-loads depreciation expense onto current customers, shortens the effective recovery period for National Fuel's assets well below the average service lives that the Company itself supports, and produces depreciation rates that are inconsistent with the vast majority of utility depreciation practice throughout the United States. National Fuel itself uses the ALG procedure in every other jurisdiction in which it operates, including New York.

Q ARE YOU AWARE OF PUBLIC UTILITY COMMISSIONS THAT HAVE REJECTED THE USE OF THE ELG?

A Yes. I can provide three examples of public utility commissions that have rejected the use of the ELG, due to the excessive depreciation expense that results from its use.

The Kentucky Public Service Commission ("Kentucky PSC") found that the ELG procedure front-loads depreciation expense in earlier years and decreases it in the later years of an asset's depreciation life, creating a mismatch of revenues and expenses. The Kentucky PSC states reasoning for rejecting the ELG is as follows:

> Duke Kentucky proposes, as part of developing its depreciation rates, the continued use of the ELG procedure. The Attorney General recommends the Commission adopt the ALG procedure in developing Duke Kentucky's depreciation rates. The Attorney General contends that the ALG methodology is the predominant method that is used in the electric industry for developing depreciation rates. The Attorney General contends that, under the ELG methodology, the capital recovery periods are accelerated and shortened and, thus, the depreciation rates are greater than if the ALG procedure was used. The Attorney General argues that the ALG procedure is as accurate as the ELG procedure and the ALG procedure smooths the data so that the depreciation rates for the group of assets tend to remain constant. Use of the ALG procedure will result in a decrease in Duke Kentucky's depreciation expense of $6.920 million.
>
> Duke Kentucky requested an increase in depreciation expense of $6.920 million, based on its request to utilize the ELG procedure for computing depreciation rates. As was discussed in the rate base section of this Order, this Commission has found that the ELG procedure does not accurately match revenues and expenses, is front-loaded, and Duke Kentucky is the only Kentucky based utility that utilizes the ELG procedure for computing depreciation rates.
>
> Regulatory accounting requires the proper matching of revenues and expense in order to produce fair, just and reasonable rates. The Commission finds Duke Kentucky's proposed ELG procedure does not meet that criteria and that Duke Kentucky's depreciation expense should be reduced by $6.920 million.

In the Matter of: Electronic Application of Duke Energy Kentucky, Inc., Kentucky PSC, Order at pages 26-27, Case No. 2017-00321.[15]

I have included the relevant pages of the Kentucky PSC Final Order as my Exhibit BCA-4.

More recently, the IURC rejected the use of ELG in Duke Energy Indiana's rate case, stating:

> First, with respect to the question of whether the ELG or ALG method should be used, we find the evidence presented by OUCC witness Mr. Garrett and Industrial Group witness Mr. Andrews persuasive, as both witnesses showed that the **ELG method results in unreasonably high depreciation rates. ALG depreciation rates result in systematical and rational cost recovery with near term customer rate relief and full cost recovery of utility investments**. While we have determined in the past that the ELG methodology was appropriate and acknowledge the weight given to precedent in many prior decisions, we always evaluate each case as it comes before us and do not need to approve the same methodology based on prior decisions, especially in light of a changed landscape. **The use of ELG in a higher than average investment cycle has the effect of unnecessarily increasing the near term depreciation expense as compared to the use of ALG**. A review and comparison of Mr. Andrew's exhibits reflecting only the ALG verses the ELG modifications applied to Mr. Spanos' results indicate that the impact of the methodology change on a percentage basis is markedly more significant for the distribution and transmission components than the production, or generation, component. This evidence is not surprising given the increased investment cycle in these categories as highlighted by the relatively recent statutory support for such investment codified at Indiana Code ch. 8-1-39. A changed and encouraged investment cycle is a material landscape change through which we consider our previous proclamations on methodology. Furthermore, the consideration of service affordability in the near term provides sufficient weight to temper our historical preference for ELG. Again, a recently enacted statute, Indiana Code § 8-1-2-0.5, directing the commission to consider "all practical means and measures" to balance necessary investment with service affordability enhances the regulatory landscape.

[15] https://psc.ky.gov/pscscf/2017%20Cases/2017-00321//20180413_PSC_ORDER.pdf

IURC Final Order at page 90 (emphasis added).[16]

I have included the relevant pages of the IURC Final Order as my Exhibit BCA-5.

The Arkansas PSC rejected ELG in favor of ALG stating,

> With regard to the proposal to adopt ELG depreciation, we agree with the criticisms raised by Ms. Freier. As we have noted in the past, **ELG will continue to result in higher depreciation rates and expense as long as a utility's plant continues to grow**. The higher accruals in the early years of an asset's life exacerbate the problem that capital costs are already front end loaded because of the higher return on investment in the early years of that asset's life**. Both ALG and ELG provide for full recovery of the investment in an asset over its life when coupled with remaining life depreciation**. **We conclude that ALG better balances the interests of shareholders and ratepayers** and reject Arkla's argument that the ELG procedure is appropriate to establish depreciation rates.

Arkansas PSC Final Order at page 29 (emphasis added)[17].

I have included the relevant pages of the Arkansas Final Order as my Exhibit BCA-6.

Q WHY IS IT APPROPRIATE FOR THE PUC TO REJECT NATIONAL FUEL'S PROPOSED USE OF THE ELG PROCEDURE AND TO REQUIRE THE USE OF THE ALG PROCEDURE AT THIS TIME?

A Just as in the 2020 Duke Electric rate case in which the IURC found that "the use of ELG in a higher-than-average investment cycle has the effect of unnecessarily increasing the near term depreciation expense as compared to the use of ALG,"[18]

[16] https://iurc.portal.in.gov/_entity/sharepointdocumentlocation/7b316e6f-1bba-ea11-a812-001dd8018831/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=45253%20ORDER%20062920.pdf

[17] https://apps.apsc.arkansas.gov/olsv2/viewdoc/pdfview.asp?document=04-121-u_286_1.pdf

[18] *See n.* 8.

National Fuel is in an accelerated investment cycle. As I have demonstrated above, depreciation rates calculated using the ELG procedure result in the front-loading of depreciation rates, and when the resulting depreciation rates are not updated annually, customers pay substantially more depreciation expense than is necessary for the utility to recover its investments.

OCA'S PROPOSED DEPRECIATION RATES

Q HAVE YOU CALCULATED 2027 DEPRECIATION RATES USING THE ALG PROCEDURE FOR NATIONAL FUEL?

A Yes. In Exhibit BCA-2, I present depreciation rates that were calculated using all of National Fuel's proposed life and net salvage parameters but applying the ALG procedure for National Fuel's gas plant. The PUC should approve the depreciation rates contained in this exhibit.

Q IF ALG DEPRECIATION RATES ARE ADOPTED TO DETERMINE DEPRECIATION EXPENSE, WILL THE ACCUMULATED DEPRECIATION BALANCE REFLECT THIS CHANGE?

A Yes. If the Commission adopts my recommendation to switch to the ALG procedure to calculate National Fuel's depreciation rates and expense going forward, the accumulated depreciation balances will automatically reflect this change on a going forward basis. I am advised by counsel that under Pennsylvania law, both annual

depreciation expense and accrued or accumulated depreciation should be calculated on a reasonably consistent basis.[19]

Q WHEN CALCULATING THE DEPRECIATION RATES USING THE ALG PROCEDURE, DID YOU ACCOUNT FOR THE CHANGE TO THE ACCUMULATED DEPRECIATION?

A Yes, I did. In Exhibit BCA-1, I present the bring forward of accumulated depreciation reserves from September 30, 2025, to October 31, 2027, based on the ALG procedure. As a result, my recommended annual depreciation expense and accumulated depreciation are calculated on a reasonably consistent basis in each service areas' presented revenue requirement.

Q HOW DO THE ALG DEPRECIATION RATES CHANGE THE DEPRECIATION EXPENSE BASED ON PLANT BALANCES AS OF OCTOBER 31, 2027?

A I present this comparison in Exhibit BCA-3. The ALG depreciation rates would reduce the depreciation expense, on plant balances as of October 31, 2027, by $4.67 million. I summarize these changes by functional group in Table 6.

[19] *Pa. Power & Light Co. v. Pa. Pub. Util. Com.*, 311 A.2d 151, 158 (Pa. Cmwlth. 1973) (*Pa. Power*).

TABLE 6

Depreciation Expense and Rate Comparison
Depreciation Study as of 10/31/2027

Group	Depreciation Expense ($ Millions) NFG PA	OCA	Delta Amount	Delta Percent	Depreciation Rate NFG PA	OCA	Delta
Intangible	$ 0.35	$ 0.35	$ (0.00)	-0.5%	1.43%	1.42%	(0.01%)
Production	$ 0.15	$ 0.09	$ (0.06)	-37.9%	3.24%	2.01%	(1.23%)
Transmission	$ 1.90	$ 1.53	$ (0.38)	-19.8%	1.79%	1.44%	(0.35%)
Distribution	$ 14.89	$ 10.76	$ (4.13)	-27.7%	1.95%	1.41%	(0.54%)
General	$ 6.13	$ 6.03	$ (0.10)	-1.6%	10.45%	10.27%	(0.18%)
Total Gas Plant	**$ 23.43**	**$ 18.76**	**$ (4.67)**	**-19.9%**	**2.45%**	**1.96%**	**(0.49%)**

Source: Exhibit BCA-3

1 **Q PLEASE DISCUSS THE APPROPRIATENESS OF OCA'S PROPOSED**
2 **DEPRECIATION RATES.**

3 A Although the 1.96% composite depreciation rate I recommend may appear to be
4 unreasonably low, that is not the case. Pennsylvania is unique in that net salvage is not
5 included in depreciation expense but rather recovered through a five-year amortization
6 of actual costs of removal. This drastically reduces depreciation rates. For gas utilities,
7 the net salvage rate for mains can be around -40% to well past -100%. Meaning that for
8 every dollar invested in mains, the utility would recover $1.40 to over $2.00 through
9 depreciation expense. In ALG depreciation, all assets are assumed to have the average
10 life of the group. For National Fuel, the Transmission Mains Account 367.1 and
11 Distribution Mains Account 376.1, represent 54% of the plant in-service. Each has a
12 proposed life of 70 years. With the ALG procedure, a 70-year life and 0% net salvage
13 would yield a depreciation rate of 1.43%.[20] If net salvage were to be included at an

[20] 1/70 = 1.43%.

average level of -50%, then the depreciation rate would be 2.14%.[21] Since National Fuel does not include net salvage in depreciation, a 1.96% composite depreciation rate is perfectly reasonable.

CONCLUSION

Q DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A Yes, it does.

[21] [1 – (-50%)]/70 = 2.14%.

QUALIFICATIONS OF BRIAN C. ANDREWS

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A Brian C. Andrews. My business address is 16690 Swingley Ridge Road, Suite 140, Chesterfield, MO 63017.

Q PLEASE STATE YOUR OCCUPATION.

A I am a consultant in the field of public utility regulation and a Principal with the firm of Brubaker & Associates, Inc. ("BAI"), energy, economic and regulatory consultants.

Q PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EMPLOYMENT EXPERIENCE.

A I received a Bachelor of Science Degree in Electrical Engineering from the Washington University in St. Louis/University of Missouri - St. Louis Joint Engineering Program. I have also received a Master of Science Degree in Applied Economics from Georgia Southern University.

I have attended training seminars on multiple topics including class cost of service, depreciation, power risk analysis, production cost modeling, cost-estimation for transmission projects, transmission line routing, MISO load serving entity fundamentals and more.

I am a member and a former President of the Society of Depreciation Professionals. I have been awarded the designation of Certified Depreciation Professional ("CDP") by the Society of Depreciation Professionals. I am also a certified Engineer Intern in the State of Missouri.

As a Principal at BAI, and as an Associate, Senior Consultant, Consultant, Associate Consultant and Assistant Engineer before that, I have been involved with several regulated and competitive electric service issues. These have included book depreciation, fuel and purchased power cost, transmission planning, transmission line routing, resource planning including renewable portfolio standards compliance, electric price forecasting, class cost of service, power procurement, and rate design. This has involved use of power flow, production cost, cost of service, and various other analyses and models to address these issues, utilizing, but not limited to, various programs such as Strategist, RealTime, PSS/E, MatLab, R Studio, ArcGIS, Excel, and the United States Department of Energy/Bonneville Power Administration's Corona and Field Effects ("CAFÉ") Program. In addition, I have received extensive training on the PLEXOS Integrated Energy Model and the EnCompass Power Planning Software. I have provided testimony on many of these issues before the Public Service Commissions in Arizona, Arkansas, California, Colorado, Florida, Illinois, Indiana, Kansas, Kentucky, Louisiana, Michigan, Minnesota, Missouri, Montana, New Mexico, Oklahoma, South Carolina, Texas, Virginia, and Washington DC.

BAI was formed in April 1995. BAI provides consulting services in the economic, technical, accounting, and financial aspects of public utility rates and in the acquisition of utility and energy services through RFPs and negotiations, in both regulated and unregulated markets. Our clients include large industrial and institutional customers, some utilities and, on occasion, state regulatory agencies. We also prepare special studies and reports, forecasts, surveys and siting studies, and present seminars on utility-related issues.

In general, we are engaged in energy and regulatory consulting, economic analysis and contract negotiation.

568523

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission

v. Docket No. R-2025-3059428

National Fuel Gas Distribution Corp.

VERIFICATION

I, Brian Andrews, hereby state that the facts above set forth in my Direct Testimony, OCA Statement 4, are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unswom falsification to authorities).

DATED: April 16, 2026

Signature:

- Brian Andrews

Address: Brubaker & Associates, Inc.
16690 Swingley Ridge Road,
Suite 140
Chesterfield, MO 63017

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

OCA'S BRINGFORWARD TO OCTOBER 31, 2027, OF THE BOOK RESERVE AS OF SEPTEMBER 30, 2025

			FUTURE TEST YEAR - YE SEPTEMBER 30, 2026							FULLY PROJECTED FUTURE TEST YEAR - 13 MONTHS ENDING OCTOBER 31, 2027						
	ACCOUNT	BOOK RESERVE AS OF SEPTEMBER 30, 2025	ANNUAL ACCRUALS	RETIREMENTS	AMORTIZATION OF NET SALVAGE	GROSS SALVAGE	COST OF REMOVAL	MISCELLANEOUS DEBITS AND CREDITS	BOOK RESERVE AS OF SEPTEMBER 30, 2026	ANNUAL ACCRUALS	RETIREMENTS	AMORTIZATION OF NET SALVAGE	GROSS SALVAGE	COST OF REMOVAL	MISCELLANEOUS DEBITS AND CREDITS	BOOK RESERVE AS OF OCTOBER 31, 2027
	(1)	(2) +	(3) -	(4) +	(5) +	(6) -	(7) +	(8) =	(9) +	(10) -	(11) +	(12) +	(13) -	(14) +	(15) =	(16)
303	MISCELLANEOUS INTANGIBLE PLANT	20,948,041	1,708,629						22,656,670	387,181						23,043,851
325.4	RIGHTS OF WAY	36,419	406	1,050					35,775	490	1,139					35,126
328	MEASURING AND REGULATING STATION STRUCTURES	9,957	14	201					9,770	55	218					9,607
329	OTHER STRUCTURES	1,384	72	52					1,404	79	57					1,426
332	FIELD LINES	169,496	8,796	8,846					169,446	9,606	9,593					169,459
334	MEASURING AND REGULATING STATION EQUIPMENT	1,706,176	59,954	64,311	4,976		10,576		1,696,218	70,589	69,740	6,109		11,469		1,691,706
365.1	LAND	-	-	106					(106)		150					(256)
365.2	RIGHTS OF WAY	665,680	30,862	16,194					680,349	36,004	22,925					693,428
366.2	MEASURING AND REGULATING STATION STRUCTURES	116,213	3,293	1,482	241		445		117,821	3,879	2,098	329		629		119,302
366.3	OTHER STRUCTURES	3,637	8	53					3,592	33	75					3,550
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	19,860,314	807,378	413,983	66,229		175,612		20,144,326	960,844	586,083	77,863		248,618		20,348,331
367.2	MAINS - CATHODIC PROTECTION	2,211,073	114,142	45,998	414		1,510		2,278,121	155,806	65,120	672		2,137		2,367,341
369	MEASURING AND REGULATING STATION EQUIPMENT	4,384,695	110,793	51,385	9,262		40,962		4,412,402	148,519	72,747	14,437		57,991		4,444,619
374.1	LAND	20,997	-	4,300	4,253	546	8,601		12,895		5,123	5,864	651	10,245		4,041
374.2	RIGHTS OF WAY	3,275,141	185,582	68,805	411		66,948		3,325,380	198,822	81,963	13,800		79,750		3,376,288
375	STRUCTURES AND IMPROVEMENTS	6,184,403	384,976	56,519	74,649	5	41,040		6,546,475	417,254	67,327	68,419	7	48,887		6,915,940
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	109,664,023	5,019,011	1,710,842	1,020,165	10,256	1,158,076		112,844,538	5,336,733	2,037,997	1,098,797	12,218	1,379,529		115,874,759
376.2	MAINS - CATHODIC PROTECTION	1,684,792	57,618	17,281	574		1,356		1,724,346	65,920	20,586	735		1,616		1,768,799
378	MEASURING AND REGULATING STATION EQUIPMENT	3,971,454	206,814	47,918	62,790		13,133		4,180,007	218,137	57,081	55,794		15,645		4,381,212
380	SERVICES	83,883,689	3,024,038	1,001,058	381,783		189,046		86,099,406	3,248,395	1,192,485	323,183		225,196		88,253,302
381	METERS	6,166,777	368,769	66,655					6,468,891	390,701	79,401					6,780,190
382	METER INSTALLATIONS	1,888,692	36,387	15,358					1,909,720	39,972	18,295					1,931,397
384	HOUSE REGULATOR INSTALLATIONS	590,253	12,978	5,222					598,009	14,224	6,220					606,013
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	7,198,874	258,626	77,713	22,650	1	48,494		7,353,944	278,369	92,574	29,604	2	57,767		7,511,578
389.1	LAND	(16,289)	-	4,401					(20,689)		4,523					(25,212)
390.1	OTHER SMALL STRUCTURES	30,192	35,109	9,182	170				56,289	35,291	9,438	170				82,312
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	128,890	9,868						138,758	12,167						150,925
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	218,003	-	23,262					194,741	4,548						199,289
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	3,372,033	1,492,562	1,303,391					3,561,204	1,614,163						5,175,367
392	TRANSPORTATION EQUIPMENT	6,913,935	1,732,782	1,138,606					7,508,111	2,180,199	1,170,351					8,517,958
394	TOOLS, SHOP AND GARAGE EQUIPMENT	2,052,863	381,135	75,426					2,358,572	446,457	65,640					2,739,389
396	POWER OPERATED EQUIPMENT AND TOOLS	2,822,852	991,863	847,073					2,967,643	1,303,899	870,690					3,400,852
397	COMMUNICATION EQUIPMENT	2,222,231	432,746	1,043,45					1,611,516	471,32	309,45					1,773,391
TOTAL		**292,386,888**	**17,475,211**	**8,120,131**	**1,648,567**	**10,809**	**1,755,799**	-	**301,645,547**	**18,049,664**	**6,919,097**	**1,695,776**	**12,876**	**2,139,481**	-	**312,345,280**

Sources:

Columns (1), (2), (4) - (8): National Fuel Exhibit C, FTY Table 2
Column (3): OCA 2026 Depreciation Model
Column (10): OCA 2027 Depreciation Model
Column (11) - (15): National Fuel Exhibit C, FPFTY Table 2

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF OCTOBER 31, 2027

AVERAGE LIFE GROUP PROCEDURE

	DEPRECIABLE GROUP	SURVIVOR CURVE		ORIGINAL COST AS OF OCTOBER 31, 2027	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	COMPOSITE REMAINING LIFE
	(1)	(2)		(3)	(4)	(5)	(6)	(7)=(6)/(3)	(8)=(5)/(6)
DEPRECIABLE PLANT									
303	MISCELLANEOUS INTANGIBLE PLANT	10-SQ		24,487,946.38	23,043,851	1,444,095	347,941	1.42	4.2
PRODUCTION PLANT									
325.4	RIGHTS OF WAY	70-R4		60,320.48	35,126	25,194	566	0.94	44.5
328	MEASURING AND REGULATING STATION STRUCTURES	30-L2.5		12,094.97	9,607	2,488	96	0.80	25.9
329	OTHER STRUCTURES	40-SQ		3,168.30	1,426	1,742	84	2.66	20.7
332	FIELD LINES	50-R1.5		532,547.44	169,459	363,088	10,267	1.93	35.4
334	MEASURING AND REGULATING STATION EQUIPMENT	32-O1		3,914,290.66	1,691,706	2,222,584	79,888	2.04	27.8
TOTAL PRODUCTION PLANT				**4,522,421.85**	**1,907,324**	**2,615,098**	**90,902**	**2.01**	28.8
TRANSMISSION PLANT									
365.2	RIGHTS OF WAY	80-R4		3,362,805.19	693,428	2,669,378	40,454	1.20	66.0
366.2	MEASURING AND REGULATING STATION STRUCTURES	60-R2		298,917.97	119,302	179,616	4,423	1.48	40.6
366.3	OTHER STRUCTURES	60-R2		6,782.92	3,550	3,232	59	0.88	54.3
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	70-R2		85,799,712.21	20,348,331	65,451,381	1,101,337	1.28	59.4
367.2	MAINS - CATHODIC PROTECTION	27-S2.5		6,367,938.03	2,367,341	4,000,597	196,517	3.09	20.4
369	MEASURING AND REGULATING STATION EQUIPMENT								
	1980 AND PRIOR	30-R0.5		215,720.24	278,023	(62,303)	0	-	-
	1981 AND SUBSEQUENT	40-R1.5		10,199,251.32	4,166,596	6,032,655	184,249	1.81	32.7
	TOTAL ACCOUNT 369			10,414,971.56	4,444,619	5,970,353	184,249	1.77	32.4
TOTAL TRANSMISSION PLANT				**106,251,127.88**	**27,976,571**	**78,274,557**	**1,527,039**	**1.44**	**51.3**
DISTRIBUTION PLANT									
374.2	RIGHTS OF WAY	80-R4		17,090,714.08	3,376,288	13,714,426	209,643	1.23	65.4
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	VARIOUS	*	11,875,523.79	6,610,971	5,264,553	389,600	3.28	13.5
375.4	STRUCTURES AND IMPROVEMENTS - SMALL	40-R0.5		2,036,506.13	304,968	1,731,538	47,667	2.34	36.3
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	70-L1.5		426,654,001.60	115,874,759	310,779,243	5,601,040	1.31	55.5
376.2	MAINS - CATHODIC PROTECTION	27-S2.5		3,009,235.48	1,768,799	1,240,437	73,967	2.46	16.8
378	MEASURING AND REGULATING STATION EQUIPMENT	40-R0.5		11,811,798.18	4,381,212	7,430,586	228,222	1.93	32.6
380	SERVICES	55-R0.5		245,616,638.42	88,253,302	157,363,336	3,445,453	1.40	45.7
381	METERS	37-R1.5		18,771,077.33	6,780,190	11,990,888	410,276	2.19	29.2
382	METER INSTALLATIONS	55-R0.5		3,769,202.49	1,931,397	1,837,806	43,304	1.15	42.4
384	HOUSE REGULATOR INSTALLATIONS	55-R0.5		1,310,503.47	606,013	704,490	15,373	1.17	45.8
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMEN	55-R2		20,008,270.22	7,511,578	12,496,693	295,909	1.48	42.2
TOTAL DISTRIBUTION PLANT				**761,953,471.17**	**237,399,476**	**524,553,995**	**10,760,455**	**1.41**	48.7

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

SUMMARY OF ESTIMATED SURVIVOR CURVE, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO GAS PLANT AS OF OCTOBER 31, 2027

AVERAGE LIFE GROUP PROCEDURE

	DEPRECIABLE GROUP	SURVIVOR CURVE	ORIGINAL COST AS OF OCTOBER 31, 2027	BOOK DEPRECIATION RESERVE	FUTURE ACCRUALS	CALCULATED ANNUAL ACCRUAL AMOUNT	CALCULATED ANNUAL ACCRUAL RATE	COMPOSITE REMAINING LIFE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)=(6)/(3)	(8)=(5)/(6)
GENERAL PLANT								
390.11	OTHER SMALL STRUCTURES	40-R0.5	1,443,596.77	82,312	1,361,285	35,452	2.46	38.4
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	25-SQ	389,725.94	150,925	238,801	13,822	3.55	17.3
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	15-SQ	294,962.33	199,289	95,673	8,274	***	11.6
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	5-SQ	9,304,387.88	5,175,367	4,129,021	1,509,781	16.23	2.7
392	TRANSPORTATION EQUIPMENT		17,271,022.03	8,517,958	8,753,064	2,180,199	**	
394	TOOLS, SHOP AND GARAGE EQUIPMENT	25-SQ	12,168,098.41	2,739,389	9,428,709	490,973	4.03	19.2
396	POWER OPERATED EQUIPMENT AND TOOLS		12,847,131.23	3,400,852	9,446,279	1,303,899	**	
397	COMMUNICATION EQUIPMENT	10-SQ	5,002,361.40	1,773,391	3,228,970	490,67(	9.81	6.6
TOTAL GENERAL PLANT			**58,721,285.99**	**22,039,483**	**36,681,803**	**6,033,075**	**10.27**	
TOTAL DEPRECIABLE GAS PLANT			**955,936,253.27**	**312,366,705**	**643,569,548**	**18,759,412**	**1.96**	
NONDEPRECIABLE PLANT								
INTANGIBLE PLANT			123,845.54					
PRODUCTION PLANT			2,840.80					
TRANSMISSION PLANT			23,594.83	(256)				
DISTRIBUTION PLANT			1,083,410.41	4,041				
GENERAL PLANT			67,330.91	(25,212)				
TOTAL NONDEPRECIABLE PLANT			**1,301,022.49**	**(21,427)**				
TOTAL GAS PLANT			**957,237,275.76**	**312,345,278**	**643,569,548**	**18,759,412**	**1.96**	

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* LIFE SPAN PROCEDURE WAS USED. INTERIM SURVIVOR CURVES ARE 60-S0 AND 40-R0.5.
** ASSETS ARE INDIVIDUALLY DEPRECIATED.
*** ASSETS ADDED IN ACCOUNT 391.2 WILL BE GIVEN A 6.67 RATE BASED ON A 15-YEAR AMORTIZATION PERIOD

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

COMPARISON OF NATIONAL FUEL AND OCA DEPRECIATION MODELS
RELATED TO GAS PLANT AS OF OCTOBER 31, 2027

	DEPRECIABLE GROUP	SURVIVOR CURVE		ORIGINAL COST AS OF OCTOBER 31, 2027	NATIONAL FUEL MODEL[1] CALCULATED ANNUAL ACCRUAL AMOUNT	NATIONAL FUEL MODEL[1] CALCULATED ANNUAL ACCRUAL RATE	OCA MODEL[2] CALCULATED ANNUAL ACCRUAL AMOUNT	OCA MODEL[2] CALCULATED ANNUAL ACCRUAL RATE	DELTA CALCULATED ANNUAL ACCRUAL AMOUNT	DELTA CALCULATED ANNUAL ACCRUAL RATE
	(1)	(2)		(3)	(4)	(5)=(4)/(3)	(6)	(7)=(6)/(3)	(8) = (6) - (4)	(9) = (7) - (5)
DEPRECIABLE PLANT										
303	MISCELLANEOUS INTANGIBLE PLANT	10-SQ		24,487,946.38	349,664	1.43	347,941	1.42	(1,723)	(0.01)
PRODUCTION PLANT										
325.4	RIGHTS OF WAY	70-R4		60,320.48	609	1.01	566	0.94	(43)	(0.07)
328	MEASURING AND REGULATING STATION STRUCTURES	30-L2.5		12,094.97	116	0.96	96	0.80	(20)	(0.16)
329	OTHER STRUCTURES	40-SQ		3,168.30	84	2.65	84	2.66	0	0.01
332	FIELD LINES	50-R1.5		532,547.44	13,640	2.56	10,267	1.93	(3,373)	(0.63)
334	MEASURING AND REGULATING STATION EQUIPMENT	32-O1		3,914,290.66	131,962	3.37	79,888	2.04	(52,074)	(1.33)
TOTAL PRODUCTION PLANT				**4,522,421.85**	**146,411**	**3.24**	**90,902**	**2.01**	**(55,509)**	**(1.23)**
TRANSMISSION PLANT										
365.2	RIGHTS OF WAY	80-R4		3,362,805.19	43,437	1.29	40,454	1.20	(2,983)	(0.09)
366.2	MEASURING AND REGULATING STATION STRUCTURES	60-R2		298,917.97	5,712	1.91	4,423	1.48	(1,289)	(0.43)
366.3	OTHER STRUCTURES	60-R2		6,782.92	84	1.24	59	0.88	(25)	(0.36)
367.1	MAINS - EXCLUDING CATHODIC PROTECTION	70-R2		85,799,712.21	1,451,924	1.69	1,101,337	1.28	(350,587)	(0.41)
367.2	MAINS - CATHODIC PROTECTION	27-S2.5		6,367,938.03	220,974	3.47	196,517	3.09	(24,457)	(0.38)
369	MEASURING AND REGULATING STATION EQUIPMENT									
	1980 AND PRIOR	30-R0.5		215,720.24	0	-	0	-	0	-
	1981 AND SUBSEQUENT	40-R1.5		10,199,251.32	182,186	1.79	184,249	1.81	2,063	0.02
	TOTAL ACCOUNT 369			10,414,971.56	182,186	1.75	184,249	1.77	2,063	0.02
TOTAL TRANSMISSION PLANT				**106,251,127.88**	**1,904,317**	**1.79**	**1,527,039**	**1.44**	**(377,278)**	**(0.35)**
DISTRIBUTION PLANT										
374.2	RIGHTS OF WAY	80-R4		17,090,714.08	224,740	1.31	209,643	1.23	(15,097)	(0.08)
375.3	STRUCTURES AND IMPROVEMENTS - LARGE	VARIOUS	*	11,875,523.79	390,001	3.28	389,600	3.28	(401)	0.00
375.4	STRUCTURES AND IMPROVEMENTS - SMALL	40-R0.5		2,036,506.13	47,630	2.34	47,667	2.34	37	0.00
376.1	MAINS - EXCLUDING CATHODIC PROTECTION	70-L1.5		426,654,001.60	7,546,538	1.77	5,601,040	1.31	(1,945,498)	(0.46)
376.2	MAINS - CATHODIC PROTECTION	27-S2.5		3,009,235.48	82,809	2.75	73,967	2.46	(8,842)	(0.29)
378	MEASURING AND REGULATING STATION EQUIPMENT	40-R0.5		11,811,798.18	343,538	2.91	228,222	1.93	(115,316)	(0.98)
380	SERVICES	55-R0.5		245,616,638.42	5,246,522	2.14	3,445,453	1.40	(1,801,069)	(0.74)
381	METERS	37-R1.5		18,771,077.33	549,100	2.93	410,276	2.19	(138,824)	(0.74)
382	METER INSTALLATIONS	55-R0.5		3,769,202.49	65,069	1.73	43,304	1.15	(21,765)	(0.58)
384	HOUSE REGULATOR INSTALLATIONS	55-R0.5		1,310,503.47	23,742	1.81	15,373	1.17	(8,369)	(0.64)
385	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	55-R2		20,008,270.22	372,10	1.86	295,90	1.48	(76,195)	(0.38)
TOTAL DISTRIBUTION PLANT				**761,953,471.17**	**14,891,793**	**1.95**	**10,760,455**	**1.41**	**(4,131,338)**	**(0.54)**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION

COMPARISON OF NATIONAL FUEL AND OCA DEPRECIATION MODELS
RELATED TO GAS PLANT AS OF OCTOBER 31, 2027

	DEPRECIABLE GROUP	SURVIVOR CURVE	ORIGINAL COST AS OF OCTOBER 31, 2027	NATIONAL FUEL MODEL[1] CALCULATED ANNUAL ACCRUAL AMOUNT	NATIONAL FUEL MODEL[1] CALCULATED ANNUAL ACCRUAL RATE	OCA MODEL[2] CALCULATED ANNUAL ACCRUAL AMOUNT	OCA MODEL[2] CALCULATED ANNUAL ACCRUAL RATE	DELTA CALCULATED ANNUAL ACCRUAL AMOUNT	DELTA CALCULATED ANNUAL ACCRUAL RATE
	(1)	(2)	(3)	(4)	(5)=(4)/(3)	(6)	(7)=(6)/(3)	(8) = (6) - (4)	(9) = (7) - (5)
GENERAL PLANT									
390.11	OTHER SMALL STRUCTURES	40-R0.5	1,443,596.77	59,897	4.15	35,452	2.46	(24,445)	(1.69)
391.1	OFFICE FURNITURE AND EQUIPMENT - FURNITURE	25-SQ	389,725.94	13,745	3.53	13,822	3.55	77	0.02
391.2	OFFICE FURNITURE AND EQUIPMENT - EQUIPMENT	15-SQ	294,962.33	5,897	***	8,274	***	2,377	
391.3	OFFICE FURNITURE AND EQUIPMENT - COMPUTERS	5-SQ	9,304,387.88	1,591,732	17.11	1,509,781	16.23	(81,951)	(0.88)
392	TRANSPORTATION EQUIPMENT		17,271,022.03	2,180,199	**	2,180,199	**	0	
394	TOOLS, SHOP AND GARAGE EQUIPMENT	25-SQ	12,168,098.41	487,618	4.01	490,973	4.03	3,355	0.02
396	POWER OPERATED EQUIPMENT AND TOOLS		12,847,131.23	1,303,899	**	1,303,899	**	0	
397	COMMUNICATION EQUIPMENT	10-SQ	5,002,361.40	490,510	9.81	490,676	9.81	166	(0.00)
TOTAL GENERAL PLANT			**58,721,285.99**	**6,133,497**	**10.45**	**6,033,075**	**10.27**	**(100,422)**	**(0.18)**
TOTAL DEPRECIABLE GAS PLANT			**955,936,253.27**	**23,425,682**	**2.45**	**18,759,412**	**1.96**	**(4,666,270)**	**(0.49)**
NONDEPRECIABLE PLANT									
INTANGIBLE PLANT			123,845.54						
PRODUCTION PLANT			2,840.80						
TRANSMISSION PLANT			23,594.83						
DISTRIBUTION PLANT			1,083,410.41						
GENERAL PLANT			67,330.91						
TOTAL NONDEPRECIABLE PLANT			**1,301,022.49**						
TOTAL GAS PLANT			**957,237,275.76**	**23,425,682**	**2.45**	**18,759,412**	**1.96**	**(4,666,270)**	**(0.49)**

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* LIFE SPAN PROCEDURE WAS USED. INTERIM SURVIVOR CURVES ARE 60-S0 AND 40-R0.5.
** ASSETS ARE INDIVIDUALLY DEPRECIATED.
*** ASSETS ADDED IN ACCOUNT 391.2 WILL BE GIVEN A 6.67 RATE BASED ON A 15-YEAR AMORTIZATION PERIOD

Sources:
[1] National Fuel Exhibit C, FPFTY Table 1
[2] Exhibit BCA-2

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY KENTUCKY, INC. FOR: 1) AN ADJUSTMENT OF THE ELECTRIC RATES; 2) APPROVAL OF AN ENVIRONMENTAL COMPLIANCE PLAN AND SURCHARGE MECHANISM; 3) APPROVAL OF NEW TARIFFS; 4) APPROVAL OF ACCOUNTING PRACTICES TO ESTABLISH REGULATORY ASSETS AND LIABILITIES; AND 5) ALL OTHER REQUIRED APPROVALS AND RELIEF	)	CASE NO. 2017-00321

ORDER

Duke Energy Kentucky, Inc. ("Duke Kentucky") is a jurisdictional electric utility that generates, transmits, distributes, and sells electricity to approximately 140,600 consumers in Boone, Campbell, Grant, Kenton, and Pendleton counties.[1] Duke Kentucky also is a utility engaged in purchasing, selling, storing, and transporting natural gas to approximately 98,200 customers in Boone, Bracken, Campbell, Gallatin, Grant, Kenton, and Pendleton counties.[2] Its most recent general rate increase for its electric operations was granted in Case No. 2006-00172.[3]

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[1] Application at 2. *See also*, Direct Testimony of James P. Henning ("Henning Testimony") at 4.

[2] *Id.*

[3] Application at 4. Case No. 2006-00172, *Application of the Union Light, Heat and Power Company D/B/A Duke Energy Kentucky for an Adjustment of Electric Rates* (Ky. PSC Dec. 21, 2006).

extraordinary. In using this forecasted test period, the Commission has given full consideration to appropriate known and measurable changes.

Jurisdictional Rate Base Ratio

Duke Kentucky proposed a test-year-end Kentucky jurisdictional rate base of $700,204,561.[22] The Kentucky jurisdictional electric rate base is divided by Duke Kentucky's test-year-end total company electric rate base to derive the Kentucky jurisdictional electric rate base ratio ("Jurisdictional Ratio") for Duke Kentucky. This Jurisdictional Ratio is then applied to Duke Kentucky's total company electric capitalization to derive its Kentucky jurisdictional electric capitalization. The Jurisdictional Ratio uses the test-year-end rate base before any ratemaking adjustments applicable to either Kentucky jurisdictional operations or other jurisdictional operations. Duke Kentucky used a Jurisdictional Ratio of 100 percent.[23] The Commission has reviewed and agrees with the calculation of Duke Kentucky's test-year electric rate base for purposes of establishing the Jurisdictional Ratio.

Pro Forma Jurisdictional Rate Base

Duke Kentucky calculated a pro forma jurisdictional rate base of $700,204,561,[24] which reflects the types of adjustments made by the Commission in prior rate cases to determine the pro forma rate base. The Attorney General provided testimony and several adjustments to Duke Kentucky's proposed rate base as discussed below. The Commission finds seven adjustments are warranted to Duke Kentucky's rate base. The

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[22] Application, Schedule B-1.

[23] *Id.*, Schedule B-7.

[24] *Id.*, Schedule B.1. Duke Kentucky is not requesting to include recovery of Construction Work in Progress in base rates.

Commission finds that the excess amortization of the Carbon Management Research Group regulatory asset in the test year and the amortization of excess accumulated deferred income tax ("ADIT") should be added to the rate base. The Commission also finds that the East Bend Operations and Maintenance Expense ("East Bend O&M") regulatory asset, the East Bend Ash Pond Asset Retirement Obligation ("East Bend Ash Pond ARO") regulatory asset, the reduction in cash working capital ("CWC"), and the reduction in depreciation expense as discussed herein due to the Commission's decision to deny use of the Equal Life Group ("ELG") procedure and require use of the Average Life Group ("ALG") procedure for computing depreciation rates, net of the related ADIT as found reasonable herein, should be removed from rate base.

The Commission accepts Duke Kentucky's proposed amortization of the protected excess ADIT. The amortization for the protected excess ADIT is based upon the Average Rate Assumption Method ("ARAM"). For the unprotected excess ADIT, the Attorney General initially proposed a 20-year amortization period.[25] Subsequently, the Attorney General proposed a five-year amortization period for the unprotected excess ADIT but did not amend his testimony to reflect the change in the amortization period.[26] The Commission finds that a reasonable amortization period for the excess ADIT for Duke Kentucky's unprotected assets should be 10 years. A 10-year amortization period for the unprotected excess ADIT will balance the impact to Duke Kentucky's cash flow and provide ratepayers the full benefit of the reduction in the federal corporate income tax in a timely manner. As a result of the foregoing adjustments, the Commission finds the total

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[25] *Id.*

[26] March 8, 2018, Video Transcript of Evidence at 3:35:00.

test-year amortization for the total excess ADIT to be $4,471,984, which is an increase of $1,651,639 over the amount proposed by Duke Kentucky. The Commission finds that the amortization of the excess ADIT related to protected and unprotected excess ADIT found reasonable herein should be removed from Duke Kentucky's ADIT, which increases its rate base. Therefore, Duke Kentucky's rate base should be increased by $4,471,984 for this adjustment.

Duke Kentucky deferred $2 million it incurred to fund carbon management research by the Carbon Management Research Group ("CMRG"). In Case No. 2008-00308, Duke Kentucky sought and obtained authorization from the Commission to defer these costs for accounting purposes.[27] The regulatory asset, net of ADIT, is included in the capitalization in this proceeding. In the instant matter, Duke Kentucky sought to recover the amortization of the deferred asset over a five-year period at $400,000 per year. In the Commission's Order in Case No. 2008-00308, it stated that the CMRG regulatory asset will be amortized over a 10-year period or $200,000 per year. Therefore, the Commission finds that the Duke Kentucky's capitalization should be increased by $200,000 to reflect the proper amount of the regulatory asset in the rate base.

The Commission finds that the ADIT arising from its requirement to change Duke Kentucky's procedure for computing depreciation rates from the ELG to the ALG procedure should reduce Duke Kentucky's rate base. As discussed in the testimony of the Attorney General, the ELG procedure front-loads depreciation expense in earlier

[27] Case No. 2008-00308, *Joint Application of Duke Energy Kentucky, Kentucky Utilities Company and Louisville Gas and Electric Company for an Order Approving Accounting Practices to Establish Regulatory Assets* (Ky. PSC Oct. 30, 2008).

years and decreases it in the later years of an asset's depreciable life, creating a mismatch of revenues and expenses.[28] The Attorney General states that the ALG procedure is the dominant procedure for other electric utilities, including all other electric utilities in Kentucky.[29] Therefore, the Commission finds that the Attorney General's position on this issue is reasonable and that Duke Kentucky should use the ALG procedure for computing depreciation rates, and that its rate base should be reduced by $2,733,299 to reflect the increase in ADIT.

The East Bend O&M regulatory asset was approved by the Commission in Case No. 2014-00201.[30] In addition, in that proceeding, the Commission authorized Duke Kentucky to defer carrying charges on the O&M expense at its cost of debt. The Attorney General disputed the amount of the regulatory asset and made a recommendation of the amount of amortization assuming that the regulatory asset was included in rate base.[31]

The Commission finds that the East Bend O&M regulatory asset should be removed from rate base and Duke Kentucky's request to amortize the East Bend O&M regulatory asset over a 10-year period is reasonable and should be approved. The Commission also finds that carrying charges should be based on the cost of debt approved herein. This adjustment reduces Duke Kentucky's rate base by $36,540,123.

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[28] Direct Testimony of Lane Kollen ("Kollen Testimony") beginning at 31.

[29] *Id.* at 32

[30] Case No. 2014-00201, *Application of Duke Energy Kentucky, Inc. for (1) a Certificate of Public Convenience and Necessity Authorizing the Acquisition of the Dayton Power & Light Company's 31% Interest in the East Bend Generating Station; (2) Approval of Duke Energy Kentucky, Inc.'s Assumption of Certain Liabilities in Connection with the Acquisition; (3) Deferral of Costs Incurred as part of the Acquisition; and (4) All Other Necessary Waivers, Approvals and Relief* (Ky. PSC Dec. 4, 2014).

[31] Kollen Testimony at 31.

The East Bend Ash Pond ARO was approved by the Commission in Case No. 2015-00187.[32] Duke Kentucky proposed that the East Bend Ash Pond ARO amortization be recovered through the Environmental Surcharge Mechanism ("ESM") in its application. In addition, Duke Kentucky requested a 10-year amortization period. The Attorney General proposed that the East Bend Ash Pond ARO be removed from capitalization, as it was erroneous for Duke Kentucky to include it in both its ESM rider rate base and in base rates. The Commission finds the East Bend Ash Pond ARO should not be included in base rates because that amount is proposed to be recovered through Duke Kentucky's ESM. The Commission also finds that a 10-year amortization period is reasonable and should be approved. The parties have agreed upon this issue. This adjustment reduces Duke Kentucky's rate base by $18,509,346.

The CWC allowance included in rate base shown below is based on the adjusted operation and maintenance expenses discussed in this Order, as approved by the Commission. This adjustment reduces Duke Kentucky's rate base by $2,008,320.

Based on the Commission's finding herein where it denied Duke Kentucky's proposal to use ELG procedure rather than the ALG procedure for computing depreciation rates, the Commission finds that Duke Kentucky's accumulated depreciation in its rate base should be increased by $6,919,475.

We have determined Duke Kentucky's pro forma jurisdictional rate base for rate-making purposes for the test year to be as follows:

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[32] Case No. 2015-00187, *Application of Duke Energy Kentucky, Inc. for an Order Approving the Establishment of a Regulatory Asset for the Liabilities Associated with Ash Pond Asset Retirement Obligations* (Ky. PSC Dec. 15, 2015).

Depreciation Expense

Duke Kentucky proposes, as part of developing its depreciation rates, the continued use of the ELG procedure. The Attorney General recommends the Commission adopt the ALG procedure in developing Duke Kentucky's depreciation rates. The Attorney General contends that the ALG methodology is the predominant method that is used in the electric industry for developing depreciation rates. The Attorney General contends that, under the ELG methodology, the capital recovery periods are accelerated and shortened and, thus, the depreciation rates are greater than if the ALG procedure was used.[76] The Attorney General argues that the ALG procedure is as accurate as the ELG procedure and the ALG procedure smooths the data so that the depreciation rates for the group of assets tend to remain constant.[77] Use of the ALG procedure will result in a decrease in Duke Kentucky's depreciation expense of $6.920 million.

Duke Kentucky requested an increase in depreciation expense of $6.920 million, based on its request to utilize the ELG procedure for computing depreciation rates. As was discussed in the rate base section of this Order, this Commission has found that the ELG procedure does not accurately match revenues and expenses, is front-loaded, and Duke Kentucky is the only Kentucky based utility that utilizes the ELG procedure for computing depreciation rates.

Regulatory accounting requires the proper matching of revenues and expense in order to produce fair, just and reasonable rates. The Commission finds Duke Kentucky's

[76] *Id.* at 33.

[77] *Id.* at 35

proposed ELG procedure does not meet that criteria and that Duke Kentucky's depreciation expense should be reduced by $6.920 million.

Terminal Net Salvage – Generation Units

Duke Kentucky included an adjustment of its depreciation expense of $4.506 million to reflect the impact of terminal net salvage value.[78] Duke Kentucky's proposed depreciation rates reflect terminal net salvage, which the company contends is required under the Federal Energy Regulatory Commissions' Uniform System of Accounts.[79] Duke Kentucky further contends that, to avoid intergenerational inequity, these costs should be borne by those ratepayers who receive the benefit from the production assets.[80]

The Attorney General recommends reducing the proposed depreciation rates by removing terminal net salvage from production plant depreciation rates. The Attorney General argues that Duke Kentucky's proposed recovery of future terminal net negative salvage for production plant is unreasonable because those costs are not known with reasonable certainty today.[81] The Attorney General's recommendation is to reduce Duke Kentucky's depreciation expense by $4.506 million.[82]

The Commission finds Dukes Kentucky's recommendation on the treatment of terminal net salvage value in the computing the depreciation rates for generating units is reasonable in order to avoid intergenerational inequity and should be approved.

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[78] *Id.* at 42.

[79] John J. Spanos Rebuttal Testimony ("Spanos Rebuttal Testimony") at 4–5.

[80] Spanos Rebuttal Testimony at 4.

[81] Kollen Testimony at 39.

[82] *Id.* at 42.

ORIGINAL

Commissioner	Yes	No	Not Participating
Huston	Я		
Freeman	V		
Krevda	V		
Ober	Я		
Ziegner	V		

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF DUKE ENERGY INDIANA, LLC PURSUANT TO IND. CODE §§ 8-1-2-42.7 AND 8-1-2-61, FOR (1) AUTHORITY TO MODIFY ITS RATES AND CHARGES FOR ELECTRIC UTILITY SERVICE THROUGH A STEP-IN OF NEW RATES AND CHARGES USING A FORECASTED TEST PERIOD; (2) APPROVAL OF NEW SCHEDULES OF RATES AND CHARGES, GENERAL RULES AND REGULATIONS, AND RIDERS; (3) APPROVAL OF A FEDERAL MANDATE CERTIFICATE UNDER IND. CODE § 8-1-8.4-1; (4) APPROVAL OF REVISED ELECTRIC DEPRECIATION RATES APPLICABLE TO ITS ELECTRIC PLANT IN SERVICE; (5) APPROVAL OF NECESSARY AND APPROPRIATE ACCOUNTING DEFERRAL RELIEF; AND (6) APPROVAL OF A REVENUE DECOUPLING MECHANISM FOR CERTAIN CUSTOMER CLASSES	**CAUSE NO. 45253** **APPROVED: JUN 29 2020**

ORDER OF THE COMMISSION

Presiding Officers:
James F. Huston, Chairman
Sarah E. Freeman, Commissioner
David E. Veleta, Senior Administrative Law Judge

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process. Sierra Club and Joint Intervenors took issue with the retirement dates of Edwardsport IGCC and other coal units, finding that DEI should consider an earlier retirement of these units. In considering Edwardsport first, we find Mr. Gurganus' testimony persuasive. Edwardsport is the newest coal unit on the DEI system and continues to be a valuable asset for the Company's generating system, especially as the Company moves, as many utilities are, to retire older and less efficient coal plants. We also understand the many complexities and issues associated with primarily operating the plant on natural gas pointed out by Mr. Gurganus, not least of which is the requirement for new air permitting, elimination of tax incentives, and losing the optionality and diversity that operation primarily on coal provides. In contrast to the cross answering testimony of Mr. Schlissel, and based on the testimony provided by Mr. Gurganus, we find that Edwardsport has showed steadily increasing gasifier availability and capacity factor in line with expectations, and we note that the Company has invested in improvements at the plant, often at shareholder expense, to achieve these improvements, which Mr. Gurganus expects to continue.

As to the Company's other coal units, Sierra Club and Joint Intervenors criticize the Company's modeling that does not allow these units to retire prior to 2024. However, we find Mr. Pike's testimony on this point persuasive. There are clearly practical constraints and considerations to retiring units that should not be ignored by IRP modeling, such as labor force, community impacts, transmission constraints, and not least of all rate impact to customers. We also agree with Mr. Pike and Wabash Valley witnesses that it is reasonable to swap the retirement dates of Gibson Units 4 and 5, to accommodate the wishes of the joint owners of Gibson 5 and save the expense associated with the planned flue gas work for the units. Overall, we find that this moderate transition approach is reasonable and results in reasonable depreciation rates that, while increased compared to previous depreciation studies, are moderated to that which would accompany a more expedited transition.

Regarding the other Joint Intervenors' criticism of the IRP process, we find that the IRP is at issue in this proceeding only to the extent it helps support the proposed depreciation rates. We find Mr. Park's response to the various IRP issues reasonable and thorough. Further, we agree with Mr. Pike that models only inform us and do not themselves make reasoned recommendations or decisions. Rather, the Company does that through a review of various scenarios, sensitivities, and portfolios.

In sum, we find that DEI's proposed retirement dates, as revised in its rebuttal testimony for the Gibson 4/5 retirement date switch, are reasonable and prudent and will result in fair and reasonable rates for customers who benefit from the Company's rate base.

(C) <u>Depreciation Rates and Expense</u>. Mr. Spanos presented and supported a depreciation study related to DEI's electric plant as of December 31, 2018, as well as a fair value study. He testified that depreciation refers to the loss in service value not restored by current maintenance, incurred in connection with the consumption or prospective retirement of utility plant in the course of service from causes which are known to be in current operation, against which the Company is not protected by insurance. He stated that among the causes to be given consideration are wear and tear, decay, action of the elements, obsolescence, changes in the art, changes in demand and the requirements of public authorities. He testified that in preparation of his study, he followed generally accepted practices in the field of depreciation and valuation. He

testified that his recommended depreciation rates appropriately reflect the rates at which the costs of DEI's assets are being consumed over their useful lives, and that the rates are an appropriate basis for setting electric rates in this matter and for the Company to use for booking depreciation and amortization expense going forward.

He testified the purpose of the depreciation study was to estimate the annual depreciation accruals related to electric plant in service for ratemaking purposes and determine appropriate average service lives and net salvage percentages for each plant account. He stated that in preparing his study, he used the straight line remaining life method of depreciation, with the equal life group procedure for all plant assets except some general plant accounts. He stated the annual depreciation is based on a method of depreciation accounting that seeks to distribute the unrecovered cost of fixed capital assets over the estimated remaining useful life of each unit, or group of assets, in a systematic and rational manner. He testified that for certain General Plant Accounts, he used the straight line remaining life method of amortization. He explained that the annual amortization is based on amortization accounting that distributes the unrecovered cost of fixed capital assets over the remaining amortization period selected for each account and vintage.

To determine his recommended annual depreciation accrual rates, in the first phase of his study, he estimated the service life and net salvage characteristics for each depreciable group -- each plant account or subaccount identified as having similar characteristics. Then in the second phase of his study, he calculated the composite remaining lives and annual depreciation accrual rates based on the service life and net salvage estimates determined in the first phase.

He explained that in the first phase of the study he compiled historic data through 2018 from records related to DEI's plant; analyzed these data to obtain historic trends of survivor and net salvage characteristics; obtained supplementary information from DEI's management, and operating personnel concerning practices and plans as they relate to plant operations; and interpreted the above data and the estimates used by other electric utilities to form judgments regarding average service life and net salvage characteristics. To analyze the service life data, he used the retirement rate method and applied the retirement rate method to each different group of property in the study. He explained that the retirement rate method produces an original survivor curve for that property group, and that interpretation of the original survivor curves is required in order to use them as valid considerations in estimating service life. He explained that widely used Iowa-type survivor curves were used to perform the interpretations. He further testified that he used the life span technique, which has been used previously for DEI, to estimate the lives of significant facilities for which concurrent retirement of the entire facility is anticipated.

He testified that DEI provided the production facility life span estimates based on informed judgment that incorporates factors for each facility such as the age, use, size, nature of construction, and technology of the facility; management plans and outlook for the facility; the estimates for similar facilities for other utilities; and the results of the Company's 2018 IRP. DEI witness Mr. Keith Pike discusses the life span estimates in detail, as is discussed below. Mr. Spanos also stated that he made a field review of DEI's property during November 2018 to observe representative portions of plant and that he also made field visits during prior studies since 1999. He explained that field reviews are conducted to become familiar with Company operations and

obtain an understanding of the function of the plant and information with respect to the reasons for past retirements and the expected future causes of retirements.

He next discussed net salvage -- a component of the service value of capital assets that is recovered through depreciation rates. He explained that the service value of an asset is its original cost less its net salvage, and net salvage is the salvage value received for the asset upon retirement less the cost to retire the asset. He stated that when the cost to retire exceeds the salvage value, the result is negative net salvage.

He testified that inasmuch as depreciation expense is the loss in service value of an asset during a defined period, (*e.g.* one year), it must include a ratable portion of both the original cost and the net salvage. That is, he stated, the net salvage related to an asset should be incorporated in the cost of service during the same period as its original cost so that customers receiving service from the asset pay rates that include a portion of both elements of the asset's service value, the original cost and the net salvage value.

He testified that the net salvage percentages estimated in the depreciation study were based on informed judgment that incorporated factors such as the statistical analyses of historical net salvage data; information provided by the Company's operating personnel; general knowledge and experience of industry practices; and trends in the industry in general. He stated that the statistical net salvage analyses incorporate the Company's actual historical data for the period 1989 through 2018 and consider the cost of removal and gross salvage ratios to the associated retirements during the 30-year period. He explained that the net salvage percentages for generating facilities were based on two components: the interim net salvage percentage, and the final net salvage percentage. He stated that the interim net salvage percentage was determined based on the historical indications from the period 1989 to 2018 of the cost of removal and gross salvage amounts as a percentage of the associated plant retired. He stated that the final net salvage, or decommissioning and dismantlement component, was determined based on the retirement activities associated with the assets anticipated to be retired at the concurrent date of final retirement. He testified that the decommissioning or dismantlement component has been included in the net salvage percentage for steam, hydro and other production facilities; the decommissioning and dismantlement component is part of the overall net salvage for each location within the production assets. He stated that based on studies for other utilities and the cost estimates of DEI, it was determined that the decommissioning or dismantlement component for steam, hydro, and other production facilities is best calculated by dividing the decommissioning or dismantlement cost by the surviving plant at final retirement. He explained that these amounts at a location basis are added to the interim net salvage percentage of the assets anticipated to be retired on an interim basis to produce the weighted net salvage percentage for each location.

He testified that the decommissioning or dismantlement cost estimates are based on the decommissioning study of each generating site performed by Burns and McDonnell (discussed below). He explained that these estimates are based on the current cost (year 2018 dollars) to decommission the facilities. He noted, however, that the costs to decommission power plants have tended to increase over time (as have construction costs in general). For this reason, he testified, in order to recover the full decommissioning costs for each site, these costs need to be escalated to the time of retirement.

After Mr. Spanos estimated the service life and net salvage characteristics for each depreciable property group, he then calculated the annual depreciation accrual rates for each depreciable group based on the straight line remaining life method, using remaining lives weighted consistent with the equal life group procedure. He stated that the calculations of annual depreciation accrual rates were developed as of December 31, 2018. He explained that the straight line remaining life method of depreciation allocates the original cost of the property, less accumulated depreciation, less future net salvage, in equal amounts to each year of remaining service life.

He testified that in the equal life group procedure, the property group is subdivided according to service life -- that is, each equal life group includes that portion of the property which experiences the life of that specific group. He stated that the relative size of each equal life group is determined from the property's life dispersion curve. He explained that this procedure eliminates the need to base depreciation on average lives, inasmuch as each group is equivalent to a unit having a single life. The full costs of short-lived units are accrued during their lives, he stated, leaving no deferral of accruals required to be added to the annual costs associated with long-lived units. The calculated depreciation for the property group is the summation of the calculated depreciation based on the service life of each equal life group, according to Mr. Spanos.

Mr. Spanos testified that the equal life group procedure allocates the capital cost of a group property to annual expense in accordance with the consumption of the service value of the group.

He added that the more timely return of plant investment accomplished by fully accruing each item's cost during its service life not only reduces the risk of incomplete capital recovery, but also results in less investment-related cost over the life span of a depreciable group. He explained that under the equal life group procedure, the future book accruals (original cost less book reserve) for each vintage are divided by the composite remaining life for the surviving original cost of that vintage, and the vintage composite remaining life is derived by summing the original cost less the calculated reserve for each equal life group and dividing by the sum of the whole life annual accruals.

Mr. Spanos stated that amortization accounting is used for accounts with a large number of units, but small asset values. In amortization accounting, he explained, units of property are capitalized in the same manner as they are in depreciation accounting; however, depreciation accounting is difficult for these assets because periodic inventories are required to properly reflect plant in service. Consequently, he stated, retirements are recorded when a vintage is fully amortized rather than as the units are removed from service -- that is, there is no dispersion of retirement; all units are retired for depreciation purposes when the age of the vintage reaches the amortization period. He emphasized that amortization accounting is only appropriate for certain Common and General Plant accounts – in this case, for plant accounts which represent approximately one percent of depreciable plant.

Mr. Spanos testified that the development of the book reserve for each location has been established based on a composite rate for a group of locations within an account; thus, the actual book reserve at the location level was determined by applying a composite rate to the plant balance.

He explained that when dealing with group depreciation there are multiple parameters that affect the rate, such as interim survivor curve, probable retirement date and net salvage percent among the key factors. He further explained that in conducting a depreciation study, a more defined manner of determining the individual location rates should be established. He testified that these key factors or parameters establish the theoretical reserve which is utilized to appropriately assign the book reserve at the location and vintage level. He noted that updating retirement dates adjusts the weighting between the locations; therefore, a changed retirement date, survivor curve or net salvage percent for one location affects all the locations in the account.

Mr. Spanos next addressed depreciation rates for DEI's new solar generation assets planned by year-end 2019. He explained that the rates for these assets will be based on interim survivor curves for each account, a negative net salvage percent for some of the accounts, and a 25- year life span for all assets at the location. He stated that an estimated rate for new battery storage assets in Account 363 was also prepared.

Mr. Spanos testified concerning his fair value study. He explained that his study segregated the property by plant account consistent with the depreciation study and Company accounting system. More specifically, he first determined the Reproduction Cost New ("RCN") for the property in service at December 31, 2018, by trending the original cost and then deducting depreciation to arrive at the Reproduction Cost New Less Depreciation ("RCNLD"). He explained that for the property for which he determined the trended original cost, he used cost indexes. He calculated the RCN of the Company's electric plant in service as of December 31, 2018, to be $27,218,507,545; and he calculated the RCNLD of the Company's electric utility plant in service as of December 31, 2018 to be $11,633,493,162, which is 43% of the Reproduction Cost New. Mr. Spanos also provided the same fair value study information using the Company's forecasted electric utility plant in service as of December 31, 2020. He testified that it was calculated using the same methodology as his 2018 study and that the RCN of the Company's electric plant in service as of December 31, 2020, is $28,967,368,703 and the RCNLD is $12,054,723,694.

Company witness Mr. Jeffery Kopp sponsored the decommissioning study prepared by Burns & McDonnell for this proceeding. Mr. Kopp explained why it is necessary to demolish a generating station at the end of useful life, citing reuse of land, public safety, and environmental remediation of potential health hazards. The decommissioning study provided an estimated total cost, in 2018 dollars, of decommissioning and dismantling each Company-owned generation unit at the end of its useful life, as well as the total cost of decommissioning and dismantling the common facilities at these generating plants. The total decommissioning and dismantlement cost as determined by Burns and McDonnell and reflected in the Decommissioning Study, was net of salvage value for scrap materials at each plant. In general, the study assumed that each generating site would be restored to a condition appropriate for industrial use. This means that all sites will have above grade buildings and equipment removed, foundations removed to two feet below grade, be rough graded, and seeded. Sites also will have small diameter underground pipes capped and abandoned in place. Mr. Kopp explained that each of DEI's electric generating plants was evaluated, including steam, hydro and other facilities, including solar and that the Burns & McDonnell team visited all plants for which site-specific decommissioning and dismantlement cost estimates were prepared. Mr. Kopp described the types of costs included in the decommissioning study and how the estimates for the direct costs were developed using a bottoms-

up cost estimating approach. He explained how scrap values were determined and the necessity of including project indirect costs in the estimate, as well as the determination of the indirect costs included. He further explained that contingency costs had been included in the estimate, and that a contingency cost accounts for unspecified but reasonably expected additional costs to be incurred by the Company during the execution of decommissioning and dismantlement activities and contingency. He explained that these costs are in addition to the direct costs associated with the base decommissioning and dismantlement known scope items and that application of contingency is not only appropriate, but also standard industry practice. He further explained that DEI provided estimated remaining M&S inventory balances for inclusion in the Decommissioning Study, with a portion of the inventory given a salvage credit to reflect potential reuse or resale of remaining M&S. The estimated total net decommissioning and dismantlement cost for DEI's generation facilities included in the study is $420,569,400 in 2018 dollars. Mr. Kopp stated that the estimates used in the study were carefully prepared using standard and accepted estimating techniques and the best information available, and are consistent with Burns & McDonnell's industry experience. He stated that assumptions used were reasonable and that the inclusion of remaining M&S balance in the decommissioning and dismantlement costs is also reasonable, as maintaining an adequate inventory of M&S for the operation and maintenance of the generating units up to their end of life represents a prudently incurred cost for providing service to customers.

OUCC witness Garrett testified that he employed a depreciation system using actuarial plant analysis to statistically analyze the Company's depreciable assets and develop reasonable depreciation rates and annual accruals. In contrast to Mr. Spanos' use of the Equal Life Group ("ELG") procedure, Mr. Garrett recommends the calculation of depreciation rates under the Average Life Group ("ALG") procedure. He also proposed adjustments to the Company's proposed terminal net salvage rates. More specifically, Mr. Garrett testified that the OUCC's proposed depreciation adjustments comprise several key issues: (1) calculating rates under the ALG method; (2) removing contingency costs from DEI's decommissioning cost estimates; (3) removing inventory costs from DEI's decommissioning cost estimates; (4) removing escalation factors from DEI's terminal net salvage calculations; and (5) adjusting the Company's proposed service lives for several of its transmission and distribution accounts. During cross-examination, Mr. Garrett testified that he did not make a field visit prior to completing his depreciation recommendations.

Mr. Garrett testified that depreciation rates calculated under the ELG procedure for a particular vintage group of property will be higher in earlier years relative to later years, citing to [Wolf] and the National Association of Regulatory Utility Commissions ("NARUC") as support for his testimony. In contrast, he stated, depreciation rates calculated under the ALG procedure for a particular vintage group of property will be the same each year. Further, he testified that in order for depreciation rates calculated under the ELG procedure to be accurately applied, a utility's depreciation rates would need to be adjusted each year to reflect the decreasing depreciation rates for applicable account. He stated that under the ELG procedure, as proposed by DEI, the Company's depreciation rates would simply be applied each year until the next depreciation study is filed, regardless of the fact that depreciation rates should decrease annually during that time under the ELG procedure. He testified that this arrangement does not result in a systematic and rational cost recovery mechanism, and, by proposing depreciation rates under this scheme, DEI

has failed to meet its burden to make a convincing showing that its proposed depreciation rates are not excessive.

He stated that, in theory, the ELG could be part of a systematic and rational cost recovery system. In practice, however, it would be difficult to come to the same conclusion, because in order for the ELG procedure to be properly applied, a utility would need to revise depreciation each year. However, he stated, given the logistical realities involved with prosecuting rate cases, this would be impractical and inefficient.

He further testified that when a utility has made substantial, recent capital investments, depreciation expense calculated under the ELG method will always be higher than the expense calculated under the ALG method; the larger the amount of the investments, the larger the discrepancy will be between the two procedures. He attributed utilities' use of the ELG method to a desire by utility finance managers to increase cash flow and a desire by utility investors to reduce risk through accelerated capital recovery. He emphasized that the rules and standards governing capital recovery through depreciation require that public utilities recover their capital investments in a systematic and rational manner, accomplished by estimating service life through actuarial analysis and other objective techniques.

He noted that in the pending I&M rate case, the utility proposed depreciation rates using the ALG procedure; no party opposed the utility's use of the ALG procedure and no party proposed using the ELG procedure. He stated that, in his experience, the ALG procedure is the most commonly used procedure by analysts in depreciation proceedings. Thus, he concluded, the majority of depreciation rates approved by regulators around the country are calculated under the ALG procedure.

Mr. Garrett testified that if the IURC accepted all of DEI's substantive depreciation positions, but simply adopted the ALG procedure, it would result in depreciation rates that are much more fair and reasonable than those proposed by the Company. He further testified that it could be reasonable to use the ELG procedure if DEI was also proposing to have its depreciation rates adjusted every year in order to reflect a mathematically proper application of the ELG procedure, but that was not a part of the Company's filing. Instead, he claimed, to the extent the Company's ELG-derived rates are adopted, the Company will receive arbitrarily higher cash flows for its investors each subsequent year after this proceeding until its next depreciation study is filed. Under these circumstances, he concluded, the Company has not made a convincing showing that its proposed rates are not excessive.

Mr. Garrett next addressed the issue of contingency costs. He testified that the Company's terminal net salvage costs are estimated through demolition studies for most of its generating units. He stated that the demolition studies include contingency costs that purportedly reflect uncertainties in future demolition estimates. However, he claimed that contingency costs are unknown by definition, and therefore are not known and measurable. He stated that charging current ratepayers for speculative costs that may not even occur up to decades in the future is inherently problematic from a ratemaking perspective. Mr. Garrett stated that Duke identified no legal obligation in its testimony that requires it to demolish its power plants consistent with the activities described in the decommissioning cost estimates. He opined that in the absence of such

a legal requirement being imposed in the foreseeable future, actually incurring these costs is speculative. He also suggested that if and when Duke actually demolishes the power plants and requires more funding to do so, it can request additional funds from ratepayers when actual costs are known.

With regard to the issue of inventory costs, Mr. Garrett noted that DEI included $185 million of inventory costs as part of its decommissioning cost estimates. However, he stated, inventory costs are not typically included as part of decommissioning cost estimates, and he testified that he could not recall ever seeing such costs proposed in a decommissioning study, including those filed by Burns & McDonnell in prior cases. He noted that decommissioning studies estimate the terminal salvage and cost of removal of generating facilities, and he testified that DEI has not shown how the inclusion of inventory relates to that process. Furthermore, he stated that Burns & McDonnell has not conducted an analysis supporting the level of inventory included in the decommissioning costs.

Mr. Garrett next addressed the Company's use of escalation factors to escalate its demolition cost estimates from present-day dollars to the future retirement date of each generating unit by applying an annual cost inflation factor. According to Mr. Garrett, the problem with this approach is that current ratepayers are forced to pay for a future-value cost with present-day dollars. He claims that this "scheme" violates basic time-value-of-money principles. He testified that if future, escalated costs are allowed, they should then be discounted back to present-day dollars by the Company's weighted average cost of capital, noting that a similar approach is used to account for asset retirement obligations. He concluded, however, that it would be more straight-forward and reasonable to simply disallow the escalation factors and base the Company's decommissioning costs on present value.

Brian Andrews testified on behalf of the Industrial Group with respect to depreciation issues. His stated that DEI's proposed depreciation expense increase is excessive and unduly burdens customers.

He testified that DEI's continued reliance on the ELG procedure for calculating depreciation rates is burdensome to customers. He claimed that ELG depreciation rates are front-loaded and must be updated annually for proper implementation. He further claimed that DEI is the only Duke electric company that utilizes the ELG procedure to calculate depreciation rates, and it has the highest depreciation rate of any of the Duke electric companies. He stated that all other Duke electric companies use the ALG procedure, the most commonly utilized procedure for calculating depreciation rates.

He argued that, by rejecting ELG in favor of ALG, the Commission has an excellent opportunity to achieve the following: (1) allow Duke to retire its coal plants early according to its preferred portfolio, helping achieve significant carbon reductions in Indiana, (2) significantly reduce the rate increase while allowing those early retirements and the resources that will eventually replace them, and (3) utilize the depreciation procedure that is most commonly used in the country.

Mr. Andrews also argued that DEI is attempting to recover through depreciation rates an excessive amount of costs for the demolition of its production plants. He noted that in the decommissioning cost estimates, Duke has included net inventory costs, which is the level of inventory that existed at the plants as of June 2018. He took the position that, as Duke knows the precise retirement dates of these facilities, Duke should effectively manage this inventory and strive to eliminate these balances over the remaining life of the plants. He argued that these costs should be removed from the decommissioning costs estimates that are included in the net salvage rate and depreciation rate calculations.

He also noted that, in the decommissioning cost estimates, Duke has included contingency costs. He characterized these costs as simply a 20% adder to the demolition costs and unnecessary depreciation expense. He recommended that these contingency costs be removed from the decommissioning costs estimates that are included in the net salvage rate and depreciation rate calculations.

Mr. Andrews observed that in the net salvage rate calculations, Duke has included cost escalation. He testified that these costs were determined with an excessive and unsupported 2.5% annual inflation rate and burden current customers with unnecessary depreciation expense. He recommended that these escalation costs should be based on 2.0% inflation before being included in the net salvage rate and depreciation rate calculations.

Mr. Andrews stated that the IURC should reject Duke's ELG depreciation rates and approve the depreciation rates presented in his testimony. He testified that this will reduce the test year depreciation expense by $120 million, or by 83% of Duke's proposed increase, while still allowing coal plant retirements at Duke's proposed time schedule.

Mr. Spanos testified in rebuttal, noting that while each party proposes a fairly significant change in depreciation expense compared to the Company's proposal, the vast majority of the dollar impact of their changes is due to their deviation from Commission precedent. That is, most of their proposed reduction in depreciation expense is based on issues that the Commission has already decided. He stated that the issue with the single largest impact is the Company's use of the Equal Life Group ("ELG") procedure instead of the Average Life Group ("ALG") procedure. He noted that the Commission has clearly stated that "[w]e consider the debate between ELG and ALG to have already been resolved. This Commission has frequently and consistently expressed its preference for the use of the ELG procedure."[5] The Commission has similarly ruled that it is appropriate to include contingency in decommissioning estimates and that decommissioning estimates should be escalated to the date of retirement (for example, see NIPSCO Cause No. 43526). Accordingly, the only issues raised by OUCC and IG that have not been resolved by the Commission relate to the inclusion of inventory costs in decommissioning (which is addressed by DEI rebuttal witnesses Kopp and Mosley), Mr. Andrews' use of a lower escalation rate, and Mr. Garrett's life estimates for a few accounts.

[5] IURC 8/25/2010 Final Order in Cause No. 43526 at 51.

Mr. Spanos stated that the OUCC proposes a reduction in depreciation expense of $107 million, however, $93 million of this amount is due to the use of the ALG procedure, the removal of contingency and the removal of escalation. Similarly, he stated, the Industrial Group proposes a $120 million reduction in depreciation expense, however, $88.7 million of this is due to the use of the ALG procedure. An additional amount is the result of the parties' proposal to remove contingency.

With regard to Mr. Garrett's and Mr. Andrews' argument that ELG depreciation requires annual updates, Mr. Spanos testified the simple examples they provide to support their opinions are not reflective of real-world operations. He stated that this argument is unpersuasive for multiple reasons. First, he noted this Commission has used ELG for many years and has not required companies to update depreciation rates annually. Second, he stated that both Mr. Garrett and Mr. Andrews are incorrect that annual updates would be required. He pointed out that both examples shown to support their opinions are simplistic examples based on only a single vintage of plant. Thus, their examples do not match real-world experience. For most utility plant accounts, he stated, assets are added and retired every year. Due to this continual activity, he testified, ELG depreciation rates do not actually change as much as Mr. Garrett and Mr. Andrews claim. Third, he testified that annual updates are quite common in Pennsylvania. He stated that his firm performs depreciation studies – and annual updates – for most utilities in Pennsylvania. As a result, he has the opportunity to review changes to depreciation rates that occur each year that result from annual updates to depreciation calculations. In actual practice, he testified, ELG depreciation rates are much more stable than Mr. Garrett and Mr. Andrews claim. He stated that in aggregate, the ELG depreciation rates typically do not change dramatically from year to year and would not warrant annual updating as Mr. Garrett and Mr. Andrews assume.[6] Mr. Spanos testified that, in reality, there is little need to update depreciation rates annually when using the ELG procedure. He noted that the Commission has not been concerned enough with this issue to require annual updates in the many decades since the ELG procedure was first adopted. Accordingly, he concluded, Mr. Garrett's and Mr. Andrews' arguments to this effect are not a persuasive reason to abandon its use in Indiana.

Mr. Spanos also testified about the downsides of moving to an ALG methodology. He testified that a switch from ELG to ALG depreciation rates will result in artificially low depreciation rates due to the higher accumulated depreciation currently on the Company's books due to the historical use of ELG depreciation rates. He stated that this in turn will result in a short-term benefit that will be paid for by future customers who will also pay a return on the higher rate

[6] Mr. Spanos noted there are other aspects of depreciation that have the potential to change each year. For example, any additions to life span property result in a change to the depreciation rate (since the new asset will have a shorter life than the existing assets at the life span facility). Remaining life depreciation rates also change each year. He pointed out that Mr. Garrett proposes a change in approach from Commission precedent for terminal net salvage that would require annual updates, proposing to only include decommissioning costs at today's cost levels, which would mean the decommissioning costs would need to change each year due to changes in cost levels that occur from year to year. However, Mr. Spanos stated, for Mr. Garrett's terminal net salvage proposal (as well as other aspects of depreciation that change each year), he appears unconcerned with the potential for annual updates to depreciation rates. This gives less merit to Mr. Garrett's concerns regarding ELG, in Mr. Spanos' view.

base that will result from the proposed ALG depreciation rates. He characterized this approach as inequitable both because it will artificially reduce rates at the expense of future customers and because those customers will have to pay for the costs of generation that replaces the Company's coal-fired generation that will be retired. He concluded that Mr. Andrews' proposal would unfairly shift the costs of power plants that will soon be retired to future customers, who will receive no service from these plants. Additionally, Mr. Spanos noted, the historical use of ELG depreciation rates, as well as the inclusion of contingency and escalation in decommissioning estimates, already provides a benefit to customers as the Company transitions from coal-fired generation. While the retirement of coal-fired generation at earlier ages than previously expected does result in an increase in depreciation expense in this case, he stated that the Company has recovered more depreciation to date due to the historic use of ELG depreciation rates and more adequate levels of decommissioning (due to the inclusion of contingency and escalation) means that accumulated depreciation is higher than had Mr. Andrews' and Mr. Garrett's preferred approaches been adopted. The result, he noted, is that there is less to recover for the plants that will be retired. To put this a different way, he explained, had ALG been used in the past and no contingency or escalation included, the increase in depreciation resulting from earlier coal-fired generation would be higher than it is in the current case.

Mr. Spanos testified that Mr. Garrett is incorrect to argue that "it is preferable for regulators to ensure that assets are not depreciated before the end of their economic useful lives." While the goal is to estimate depreciation as accurately as possible, it is important to remember that depreciation is a forecast of events many years in the future and as a result estimates do not always match the actual experienced lives and net salvage of a Company's assets. Given this reality, Mr. Spanos opined, erring on the higher side for depreciation rates is preferable than the lower side because the likelihood and the risks of adverse effects on both the utility and customers are greater if depreciation is underestimated. He also added that too low of depreciation rates increases rate base, which results in customers paying higher total rates due to the return on rate base.

Mr. Spanos also took issue with Mr. Garrett's and Mr. Andrews' use of the word "accelerated" to describe the ELG methodology. He testified that ELG is a straight line method; ELG recovers costs on a straight line basis over the expected life of each equal life group.

Mr. Spanos reiterated that there are sound reasons to use the ELG procedure. He noted that this Commission has addressed this issue multiple times in the past and ruled in favor of ELG. And he noted that ELG is also discussed and supported in authoritative depreciation texts and academic literature. One such authority – and a very significant one – is Robley Winfrey, who, as a professor at Iowa State University, developed the Iowa survivor curves that are universally used in estimating service lives based on historical retirement data and is generally regarded as the father of utility depreciation practices, referred to the ELG procedure as "the only mathematically correct procedure."[7]

[7] Robley Winfrey, Depreciation of Group Properties, Bulletin 155 (Ames, IA: Iowa State University Press, 1942, reprinted 1969); p. 71.

Additionally, he emphasized that it is also important to understand that the change in depreciation resulting from the OUCC and Industrial Group's proposed change to ALG rates is not simply due to the difference between the two procedures. Rather, a portion of this change results from the fact that accumulated depreciation is higher today due to the historical use of ELG depreciation rates than it would have been had ALG depreciation rates been used. A change to ALG rates today will, therefore, result in a greater benefit to today's customers than to other generations of customers. This occurs both because depreciation rates are lower due to the historical use of ELG depreciation rates and because rate base is lower due to the higher accumulated depreciation resulting from the historical use of ELG depreciation rates. If Mr. Andrews' proposal were adopted, it will be future customers that pay the cost for this benefit given to current customers. Future customers will have to pay higher ALG depreciation rates than current customers as remaining life depreciation rates result in accumulated depreciation that will eventually revert to a lower level from the use of the ALG procedure. Future customers will also have to pay a return on the higher rate base that results from the lower ALG depreciation rates. In summary, he testified, Mr. Andrews' proposal will result in shifting costs from today's customers to future generations of customers.

Mr. Spanos next addressed the three adjustments proposed by the OUCC and Industrial Group to the decommissioning cost estimates used in the depreciation study. The first type of adjustment is related to the escalation of decommissioning costs to the time of retirement. The OUCC proposes to remove the escalation component entirely. The Industrial Group recommends the escalation of decommissioning costs, but uses a 2.0% escalation rate instead of the 2.5% escalation rate proposed by Mr. Spanos. The second proposed adjustment is that both the OUCC and Industrial Group advocate removing contingency from the decommissioning estimates. Mr. Spanos noted that both of these issues have been previously addressed by the Commission, which has ruled in favor of the Company's proposals to include escalation and contingency. The third proposed adjustment is that both parties propose the removal of inventory costs from the Company's terminal net salvage estimates. Mr. Spanos noted that he does not address this issue, which is instead addressed by rebuttal witnesses Mr. Kopp and Mr. Mosley. He also noted that Mr. Kopp also addresses the contingency issue, although Mr. Spanos briefly discussed Commission precedent regarding this issue.

With regard to the issue of including escalation in the calculation of decommissioning costs, Mr. Spanos stated that escalation is necessary in order to recover the full net salvage costs of these facilities over their service lives and has previously been accepted by the Commission. He noted that Mr. Andrews recognizes that escalation should be included in the terminal net salvage estimates, but proposes a lower escalation rate of 2.0%. Mr. Spanos testified that, in order to equitably recover the full costs of the Company's assets, including net salvage, net salvage must be based on future costs because decommissioning is going to occur in the future. He emphasized that net salvage must include the effects of future increases in costs, as recognized on multiple occasions by this Commission.

Mr. Spanos noted that Mr. Garrett makes one main argument in support of his proposal to eliminate escalation from the terminal net salvage estimates. He states that "[i]t is not proper to charge current ratepayers for a future cost that has not been discounted to present value." He supports this assertion by stating that "[t]he 'time value of money' concept is a cornerstone of

finance and valuation." Mr. Spanos testified, his opinion on this concept with regard to depreciation is incorrect. Mr. Spanos reiterated that depreciation is based on the actual cost at the time of installation or retirement. While the "time value of money" may be a cornerstone of finance and valuation, it is not a concept used in depreciation as widely practiced in the industry. Indeed, Mr. Spanos testified, failing to incorporate escalation, as Mr. Garrett proposes, will result in understating future net salvage costs, resulting in intergenerational inequity by forcing future customers to pay too much for the facilities.

Mr. Spanos next noted that, unlike Mr. Garrett, Mr. Andrews includes an escalation component in his terminal net salvage estimates. However, he uses a 2.0% escalation rate instead of the 2.5% escalation rate used by the Company which he says "has no support and is excessive." Mr. Spanos testified that his estimate of 2.5% is reasonable for a long term rate of cost increases for power plant decommissioning. He stated that his estimate is consistent with escalation rates used previously, as well as other sources including long-term averages of Consumer Price Index ("CPI") inflation and long-term inflation forecasts; the latter is compiled by the Federal Reserve in the Livingston Survey. He noted that CPI inflation has typically been lower than long-term construction cost increases and so, if anything, his estimate is conservative.

Mr. Spanos testified that Mr. Andrews only provided an analysis based on comparing the Livingston Survey to actual CPI inflation since 1991. From this analysis, he concludes that the "average forecast error is 0.6 percentage points" for this survey since 1991. Since the current 10-year median forecast is 2.26%, he subtracts 0.6 from 2.26% to get a value a 1.66%. He concludes that 1.66% is a more realistic forecast, although he proposes an escalation rate of 2.0% "to be conservative." Mr. Spanos testified that there are multiple issues with Mr. Andrews' analysis. First, he stated that the Livingston Survey is not the only support for Mr. Spanos' estimate. Second, Mr. Andrews' calculation of the forecast error is entirely the result of two periods of time. The first is from the early 1990s and the second from the late 2000s. The forecast error in the early 1990s resulted because these years followed the high inflation of the 1970s and 1980s. That is, forecasters not unreasonably expected that higher inflation to continue, but it did not. The second period is comprised of years that encompassed the Great Recession. The Great Recession resulted in very low inflation and even deflation, but was an abnormal event. Accordingly, Mr. Spanos testified, the period of time reviewed by Mr. Andrews' likely overstates any forecast error, particularly downside errors. Indeed, the last two decades have experienced low inflation by historical standards. It should be at least as likely that current forecasts would be too low rather than too high. However, he testified, Mr. Andrews only anticipates that forecasters could be estimating too high of inflation.

Mr. Spanos testified that these concepts are illustrated if we look at longer term inflation. He stated that looking at longer term inflation rates shows that there have been many years with higher inflation. As a result, he explained, simply assuming that a 2.0% inflation rate will continue into the future is not necessarily a reasonable assumption. Mr. Spanos provided data going back to 1960 and noted that the inflation that occurred over 10-year periods was greater than 2.5% in many years. Additionally, Mr. Spanos testified that while the CPI provides a good indication of changes in prices in the overall economy, it is not necessarily a good indicator of changes in decommissioning costs. A price index that serves as a better proxy for changes in decommissioning costs is the Handy Whitman construction cost index. Mr. Spanos provided a comparison of the

changes in the Handy Whitman Index for Steam Production Plant to CPI over the past 20 years; the data shows that construction costs have increased faster than CPI over this time period. Further, he stated, the data indicates that for every single long-term period ending in 1960 through 2018, the Handy Whitman index increased at an average rate that was greater than the 2.5% escalation rate he proposed. Thus, he concluded, the Handy Whitman index supports a higher escalation rate than he proposed. In summary, he testified that multiple sources support the 2.5% escalation rate he used, and, if anything, his estimate is conservative. He concluded that Mr. Andrews' estimate is, in his judgment, too low and will not fully recover the costs to retire the Company's power plants over their service lives.

Mr. Spanos next discussed the issue of contingency. He stated that Mr. Garrett and Mr. Andrews also both propose the removal of the contingency component from the decommissioning cost estimates. Mr. Spanos noted that the use of contingency has also been previously addressed by the Commission. For example, he noted the following excerpt from a NIPSCO case, in which the Commission held that the inclusion of contingency was appropriate and also noted that Commission precedent supported the inclusion of contingency:

> Mr. Selecky argued either the post-remediation value of the land in industrial condition should be an offset to the dismantlement costs or the contingency should be eliminated as a trade-off for the value of the land. Mr. Selecky did not identify the dollar value of the land after dismantlement. As a result, there is no evidence in the record to guide us in determining whether this would produce a material difference in the depreciation rates or be a reasonable trade-off for the contingency, assuming for the sake of argument it would even be proper to treat a non- depreciable asset like land as salvage. Further, we find it noteworthy that Mr. Selecky is not a licensed real estate appraiser. As a result, the record is devoid of any evidence to judge whether his proposal to equate the value of the land with the contingency is reasonable. (42356 Order at 53-54.) We also give weight to the fact that the 20% contingency factor used in the BMcD demolition cost studies is conservative compared to the 25% contingency factor we accepted in PSI Energy, Inc., Cause No. 42359, at 70-71. Also, the assumption that the sites will be remediated to industrial condition, rather than greenfield condition, is also conservative. Id. at 70. No evidence was presented that this Commission has ever used the value of land as an offset to an asset's cost of removal. In fact, Mr. Selecky did not identify to us any decision of any regulatory commission accepting his position regarding land and the contingency. Petitioner's JJS-R5; Petitioner's Ex. JJS-R6. Given that Mr. Selecky's recommendation would be such a departure from our past practice and that we have scant evidence to guide us in this exercise, we reject Mr. Selecky's proposal.

Mr. Kopp also provided rebuttal testimony regarding the appropriateness of including contingency in the decommissioning study for this proceeding. Specifically, he noted that the application of contingency is a common and prudent practice in the construction industry, and it is included in order to recognize the probability of increases in cost over the base estimated costs due to unknowns. Mr. Kopp explained that some of these costs cannot be determined until the dismantlement process has begun. Therefore, contingency is applied on top of the base estimated cost in order to formulate a reasonable estimate to dismantle the generating facilities.

Mr. Kopp explained that the 20% contingency amount he included in this decommissioning study is the same percentage as the contingencies he has prepared for decommissioning studies for other electric utilities that have been approved by regulatory agencies in other states.

Contingency is added to account for unknown, but reasonably expected to be incurred costs. These costs are related to weather delays, unknown environmental contamination, discovering equipment or materials not shown on drawings, additional dewatering requirements and changes in the manner the work is performed.

Mr. Kopp responded to Mr. Andrews' contention that DEI has no legal obligation to demolish its retired power plants by expanding on the explanation in his direct testimony of the necessity for demolition of power plants. He explained that although there may be no legal obligation to demolish a power plant, there are legal obligations to comply with environmental regulations. He also explained that the alternative to full demolition is to retire a plant in place. He explained that retiring a plant in place requires carrying costs that are necessary to maintain a safe site and be in compliance with applicable regulations. Mr. Kopp stated in his experience he has found that retiring in place is not a cost-effective long-term scenario when the carrying costs are taken into account.

Mr. Kopp concluded by stating that excluding these reasonably expected to be incurred costs by not including contingency costs will not give the full picture of decommissioning costs. If these costs are not accounted for in planning for future decommissioning, the costs will be passed on from the current ratepayers to future ratepayers.

Company witness, Mr. Mosley, provided rebuttal testimony addressing the inclusion of inventory in the decommissioning study. He explained Duke Energy has experience managing generating stations as they near the end of their useful lives and consistently attempts to deplete remaining inventory and/or transfer it to another generating facility where it can still be used. However, there are risks associated with premature depletion of inventory due to limited availability and long lead time of parts required to sustain reliable operation that must be considered.

In addition, Mr. Mosley stated that there are often limitations on the compatibility of inventoried parts that could be transferred from one station to another. For example, most spare parts that fit Gallagher's coal mills do not fit the mills at Gibson or Cayuga. Most steam turbine and generator parts are model specific and cannot be used at other facilities. Combustion turbine and generator parts have some capability with like-in-kind models, but circa-2000 machine parts would rarely be compatible with future gas-fired generators.

Mr. Mosley also explained that as the existing coal and gas-fired generators are retired, there are increasingly less remaining opportunities to transfer useful inventory. Therefore, reflecting leftover inventory in the cost of decommissioning is a reasonable means of addressing a future where increasing numbers of generating units are retired and replaced.

Mr. Kopp also provided rebuttal testimony regarding the inclusion of obsolete inventory remaining at the end of a generating station's useful life in this decommissioning study. He explained that disposing of remaining inventory is just as much a part of decommissioning a station as disposing of other equipment and plant components. It must be safely sold, moved to other locations, or scrapped. In fact, the warehouse or other portions of the plant where the supplies are held cannot be demolished until the inventory is safely removed.

Mr. Kopp then rebutted Mr. Andrews' contention that if this equipment is not placed in service, then it is not used and useful. Mr. Kopp stated that Andrews' argument ignores that inventory is required to be maintained in order to achieve appropriate reliability of the plants and to facilitate routine maintenance on the facilities. Furthermore, Mr. Kopp stated that it is necessary to purchase this inventory before it is needed, in order to reduce outage time, and even if it is not installed, it has still served a useful purpose in maintaining plant reliability.

Mr. Kopp's testimony also stated that the value of this inventory that cannot be reclaimed through sale or scrap of the inventory is directly related to the retirement of the facility. If the facility were to remain in service, this inventory would retain its value to the plant. However, when the plant is retired, the value of this inventory is reduced to the value it has as salvage or scrap. This reduction in value of the inventory is a cost associated with net salvage rates associated with retirement and demolition of the facility. In response to Mr. Garrett's contention that Mr. Kopp had never proposed including inventory in decommissioning studies before, Mr. Kopp also cited to approval of the inclusion of inventory in a decommissioning study prepared for FPL by the Florida Public Service Commission.

Company witness Ms. Douglas also responded to the recommendations of Mr. Garrett and Mr. Andrews regarding the inclusion of end-of-life generating plant M&S inventory costs as a cost of decommissioning and dismantlement. She explained that unlike other plant, property and equipment used at a generating station, which is depreciated over its useful life and the cost of which is recovered from customers served by and benefitting from the electricity generated at the station during its useful life, under the current ratemaking construct, recovery of the cost of M&S maintained in inventory occurs only once the parts and equipment in inventory are installed in the plant. She explained that when base rates are set, under traditional Indiana ratemaking practice, inventory is included in rate base for return purposes, but is not depreciated over its life like plant. Further, the current construct assumes the M&S inventory can be used up before retirement occurs and whatever amount is left can be reused elsewhere or sold, with no current ratemaking means for recovering the cost of the remaining end-of-life inventory from the customers for whose benefit the inventory held for reliability purposes at the station was maintained. As also discussed in the rebuttal testimony of Company witness Ms. Melissa B. Abernathy, without assurance of regulatory recovery of any remaining inventory costs that have now become obsolete due to the retirement, the Company must write the inventory off as an additional, one-time expense. Ms. Douglas further

explained that the Company's proposal is reasonable because it enables the forecasted costs of the end-of-life M&S inventory to be recovered in a rational and systematic way over the remaining life of the plant from the customers who are being served by the plant and benefitting from the reliability that the inventory brings to the plant. Ms. Douglas opined that this approach is a fair and balanced way to address this issue to prevent large negative financial impacts at a plant's end of life for companies who have purchased and managed their M&S reasonably for the benefit of customers. Ms. Douglas noted that the rebuttal testimony of Company witness Mr. John Sullivan addresses the negative impacts on credit quality and financing costs that may result from write-offs such as this. Ms. Douglas concluded by noting that an alternative to recovery over the life of the plant via decommissioning costs would be the pre-approval by the Commission of the use of a regulatory asset at the end of the plant's life, with the remaining value to be recovered from customers over time in a future rate case.

(1) Commission Discussion and Findings. The depreciation-related issues in this case relate to: (1) the ELG versus ALG methodology; (2) the appropriate calculation of terminal net salvage estimates; and (3) estimated useful lives for certain mass property accounts and coal generating units. We address each of these issues in turn.

First, with respect to the question of whether the ELG or ALG method should be used, we find the evidence presented by OUCC witness Mr. Garrett and Industrial Group witness Mr. Andrews persuasive, as both witnesses showed that the ELG method results in unreasonably high depreciation rates. ALG depreciation rates result in systematical and rational cost recovery with near term customer rate relief and full cost recovery of utility investments. While we have determined in the past that the ELG methodology was appropriate and acknowledge the weight given to precedent in many prior decisions, we always evaluate each case as it comes before us and do not need to approve the same methodology based on prior decisions, especially in light of a changed landscape. The use of ELG in a higher than average investment cycle has the effect of unnecessarily increasing the near term depreciation expense as compared to the use of ALG. A review and comparison of Mr. Andrew's exhibits reflecting only the ALG verses the ELG modifications applied to Mr. Spanos' results indicate that the impact of the methodology change on a percentage basis is markedly more significant for the distribution and transmission components than the production, or generation, component. This evidence is not surprising given the increased investment cycle in these categories as highlighted by the relatively recent statutory support for such investment codified at Indiana Code ch. 8-1-39. A changed and encouraged investment cycle is a material landscape change through which we consider our previous proclamations on methodology. Furthermore, the consideration of service affordability in the near term provides sufficient weight to temper our historical preference for ELG. Again, a recently enacted statute, Indiana Code § 8-1-2-0.5, directing the commission to consider "all practical means and measures" to balance necessary investment with service affordability enhances the regulatory landscape. In response to a Docket Entry question DEI confirmed that it had not identified investments that would not be recovered with the ALG methodology as described. Therefore, we find that the application of ALG serves as a reasonable regulatory mechanism to provide rate impact moderation while not limiting DEI's reasonable recovery of its investment.

With regard to the issues surrounding the calculation of terminal net salvage estimates, we note that no party has proposed depreciation rates without terminal net salvage estimates, and,

accordingly, no party appears to disagree with the concept of including terminal net salvage in depreciation rates. Instead, the differences are related to components of the estimated costs that are included. Based on the evidence presented in this case, we find that Mr. Spanos' 2.5% inflation estimate is more realistic and should be used. Mr. Spanos supported his estimate with CPI data going back to the 1960s, as well as more relevant Handy-Whitman index data, while Mr. Andrews' supported his inflation estimate with arguably selective time periods that are not representative of future conditions.

Next we address the parties' contention that contingency be removed from the decommissioning study. We disagree with the parties that the circumstances here warrant such removal. Commission precedent supports the inclusion of contingency and we find it reasonable and appropriate again here. Similar to our previous holdings, we give weight to the fact that the 20% contingency factor used in the demolition cost studies is conservative compared to the 25% contingency factor we approved in the Company's most recent rate case. Furthermore, the assumption that the sites will be remediated to industrial condition, rather than greenfield condition, is also conservative. We therefore decline to depart from our previous practice.

Regarding the parties' arguments concerning inclusion of the cost to address end-of-life inventory at retired generating plants, these type of inventory costs are not typically included as part of decommissioning cost estimates. Normally any unrecovered amount would be expensed at the time of retirement. In rebuttal, Ms. Douglas suggested an alternative in which the Commission pre-approves a regulatory asset at end of life rather than a write-off. As presented in the Industrial Group's February 6 filing this alternative would materially lower the impact of Duke Energy Indiana's rate request. In addition, the alternative affords DEI an opportunity to undertake any and all reasonable actions to minimize the end-of-life inventories as any station retirement draws nearer. Thus, we approve the use of a regulatory asset at the end of life with the understanding that any recoverable amount will be subject to a review of actions taken in advance of any associated retirement.

Based on and incorporating the findings above, we approve for use by DEI the depreciation rates presented in the revised attachment to the Industrial Group's February 6 filing.

iii. O&M Expenses (Other than Depreciation and Taxes).

(A) Production O&M Expense. Petitioner's witness Mosley testified that DEI's 2020 power production O&M forecast is $407 million, as follows:

Category	O&M ($ in millions)
Edwardsport IGCC	$139
Coal Combustion Products	$12
New Generation Resources	$0
Power Production	$229
Other Miscellaneous Power Production	$27
Total	**$407**

n:

SEP 13 3 50 PM '05

ARKANSAS PUBLIC SERVICE COMMISSION

IN THE MATTER OF AN APPLICATION FOR A GENERAL CHANGE OR MODIFICATION IN CENTERPOINT ENERGY ARK.LA, A DIVISION OF CENTERPOINT ENERGY RESOURCES CORP'S RATES, CHARGES, AND TARIFFS

DOCKET NO. 04-121-U
ORDERNO. fb

ORDER

On November 24, 2004, CenterPoint Energy Arkla ("Arkla" or the "Company") filed an Application for approval of a general change or modification in its rates and tariffs.[1] Arkla's initial Application reflects that it was seeking a non-gas rate increase of$33,996,382 based on an overall non-gas revenue requirement of $182,525,265. Order No. 4, entered on December 16, 2004, suspended Arkla's proposed rates, charges, and tariffs pending further investigation by the Commission.

The parties to this proceeding are Arkla, the General Staff of the Arkansas Public Service Commission ("Staff'), the Attorney General of Arkansas ("AG"), Arkansas Gas Consumers ("AGC"), and the Commercial Energy Users Group ("CEUG").

Arkla filed the written testimonies of Jeffrey A. Bish, Charles J. Harder, F. Jay Cummings, Samuel C. Hadaway, Alan D. Henry, Michael TheBerge, Gerald W. Tucker, Steve Malkey, Michael J. Adams, Walter L. Fitzgerald, Michael Hamilton, and John J. Spanos. The Staff filed the written testimonies of Robert Booth, Alice D. Wright, Alisa Williams2, Don E. Martin, Gail P. Fritchman, Don Malone, L.A. Richmond, Gayle Frier, Johnny Brown, Robert H. Swaim, and Adrienne R.W. Bradley. The AG filed the written testimony of William B. Marcus.

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[1] Arkla filed additional revisions to its Application on December 27, 2004, January 10, 2005, and January 13, 2005.
[2] On August 3, 2005, the Staff filed Notice that Jeff Hilton, Manager of Staffs Audit Section, was adopting the pre-filed testimony of Staff witness Alisa Williams.

to accept his recommendation. We also note that by the parties' agreement on the 50/50 sharing of the LTIP and our acceptance of the 50/50 sharing of the STIP, the CEO bonus is effectively being shared on a 50/50 basis between ratepayers and shareholders. (TR 89-90.) As a result, AG witness Marcus' recommendation regarding the CEO bonus is resolved, and a separate adjustment is not needed. In summary, an adjustment to payroll expense of $530,874 is found appropriate in this proceeding. This reflects Staffs adjustment to disallow 50 percent of STIP expense.

Depreciation - Rates {IS-48 Depreciation Expense)

In its Application, Arkla proposed to continue to utilize the depreciation rates approved in Arkla's prior rate case and elected not to present a new depreciation study in this proceeding. (T. 85) Because of concerns which were raised in that rate case (Docket No. 01-243-U) with regard to net negative salvage, Staff witness Freier prepared a depreciation study and has proposed new depreciation rates. Based on the findings of her study, Ms. Freier recommended that the Company's proposal to adopt the currently authorized depreciation rates be rejected. Adoption of Staff witness Freier's recommended depreciation rates will result in a composite depreciation rate of approximately 3.80 percent compared to the current composite rate of approximately 5.42 percent. (T. 2007-2009)

According to Ms. Freier, the primary factor causing the difference between her proposed depreciation rates and the current rates relates to net negative salvage for the mains and services accounts. The current depreciation rates for mains and services are based on negative net salvage factors of -115 percent and -275 percent, respectively. (T. 2012-2013) Based on her

analysis, Ms. Freier proposed negative net salvage allowances of -70 percent for Mains and -115 percent for services. (T. 2032)

The salvage ratios underlying Arkla's current depreciation rate are based on the ratio of the cost of removal net of any gross salvage realized compared to the original cost of the assets retired and removed from service. Staff witness Freier notes that this has the effect of not stating retirement amounts and the negative net salvage amounts in comparable dollars because of the historical inflation which has taken place from installation to removal. According to Ms. Freier, the failure to restate historical original costs on the same basis as retirements "interjects considerable historical inflation differences into the calculation and significantly overstates the appropriate net salvage [and] the depreciation rates ...." (T. 2013) Accordingly, Ms. Freier developed her negative net salvage ratios and, in tum, her depreciation rates by restating retirements, gross salvage and cost of removal on a constant price level. (Id., p. 10.)

In addition to developing revised depreciation rates, Staff witness Freier also made several other recommendations with regard to depreciation expense. These recommendations deal with various data retention and recordkeeping issues as set forth on pages 16-18 of her Prepared Testimony. Ms. Freier also identified six accounts that are fully recovered or overrecovered including: Other Structures-Distribution; Cast Iron Mains; Other Structures-Levy PH (call center); Structures & Improvements-Services; Data Processing Equipment-Misc.; and Other Equipment-Communications Equipment-Mtr. She recommended that depreciation accruals cease on these and any other accounts where the reserve ratio equals 100 percent plus or minus any applicable net salvage. (T. 2032)

In his rebuttal testimony, Arkla witness Harder argued that Ms. Freier's proposed depreciation rates significantly understate the appropriate allowance for depreciation expense. Mr. Harder indicated that Arkla did not propose to adjust its current depreciation rates in order to narrow the issues in the instant proceeding. However, in response to Ms. Freier's proposals, Arkla submitted its own new depreciation study, sponsored by Mr. John Spanos.[6] (T. 170)

In his study, Mr. Spanos took exception to Ms. Freier's net salvage calculations. He argued that the Commission should follow the traditional method of calculating net salvage, as it has in the past. He noted that the traditional approach (comparing net salvage to original cost of the retired plant) collects net salvage ratably over the life of the plant, from the customers served by that plant. Mr. Spanos claimed this approach is both equitable and consistent with sound ratemaking principles. In contrast, he contended Staff witness Freier's approach fails to recover the total loss in-service value (depreciation plus net salvage) over the life of the asset. Mr. Spanos testified that by excluding inflation, Ms. Freier's proposal will delay recovery of full service value and create intergenerational inequities. (T. 370-371, 383-384)

In addition to responding to Staff witness Freier with regard to net salvage, Arkla witness Spanos also presented a new depreciation study to demonstrate that Ms. Freier's proposed depreciation rates were too low. As part of this study, Mr. Spanos developed new estimates of service lives and salvage percentages. In addition, the depreciation rates which he developed were based on converting from average life group ("ALG") to equal life group ("ELG") procedure.

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[6] In our Order No. 14 in this docket dated August 4, 2005, we ruled that this study was proper rebuttal, but could not be used to amend the Company's application to seek a higher depreciation allowance.

In her Surrebuttal Testimony, Ms. Freier argued that Mr. Spanos' proposal should be rejected. She noted that the composite depreciation rate proposal by Mr. Spanos would be 7.42 percent compared to the composite of 5.42 percent based on Arkla's current depreciation rates and her proposed composite of 3.80 percent. She compared this composite with the composite rates for other LDCs regulated by this Commission and concluded that the new depreciation rates proposed by Arkla are excessive. (T. 2045-2047)

In response to Mr. Spanos' criticisms of her proposal to restate the salvage allowance on a constant dollar basis, Ms. Freier noted that her treatment is fundamentally consistent with the treatment of negative salvage used in Entergy Arkansas, Inc.'s[7] nuclear decommissioning calculations. Those calculations provide for the recovery of decommissioning costs over the life of the plant in levelized, not constant, dollars. (T. 2057)

Ms. Freier also responded to Mr. Spanos' proposal to utilize the ELG procedure for calculating depreciation rates by noting that this procedure was inconsistent with Commission practice. Ms. Freier explained that both ALG and ELG are systematic and rational frameworks for calculating depreciation accruals over the life of the asset. However, ELG would cause depreciation rates to be higher in the early years of an asset's life. Moreover, because of the increasing cost of plant over time, she argued that depreciation expense will always be higher under ELG than under ALG. (T. 2047- 2050) This is particularly important for a utility such as Arkla that is adding new plant as a result of its main replacement program (TR 273.)

In his Sur-Surrebuttal testimony, Mr. Spanos argued that comparisons of composite depreciation rates are not meaningful without more specific information. (T. 394) He also

claimed that the higher depreciation accruals under ELG compared to ALG are offset by future return on rate base savings. (T. 395-397) In addition, Mr. Spanos noted that Staff witness Freier's adjustment to levelize salvage cost recovery will result in the underrecovery of future net salvage costs. He further argued that, because the accruals for the recovery of original cost are not stated in levelized dollars, Ms. Freier's procedure to restate salvage costs creates an inconsistency between the recovery of the original cost of the plant and salvage costs. Finally, Mr. Spanos noted that ratepayers receive a rate base deduction for the amounts they provide for the recovery of future net salvage because those amounts are included in the balance of accumulated depreciation until the net negative salvage costs are incurred. (T. 397-399)

With regard to the proposal to adopt ELG depreciation, we agree with the criticisms raised by Ms. Freier. As we have noted in the past, ELG will continue to result in higher depreciation rates and expense as long as a utility's plant continues to grow. The higher accruals in the early years of an asset's life exacerbate the problem that capital costs are already front end loaded because of the higher return on investment in the early years of that asset's life. Both ALG and ELG provide for full recovery of the investment in an asset over its life when coupled with remaining life depreciation. We conclude that ALG better balances the interests of shareholders and ratepayers and reject Arkla's argument that the ELG procedure is appropriate to establish depreciation rates.

We are also very concerned about the high level of negative net salvage associated with Arkla's mains and services. This issue arose previously in Arkla Docket No. 01-243-U in which Arkla was directed to perform a removal cost study. However, according to Staff witness Freier,

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[7] Entergy Arkansas, Inc. is a retail public electric distribution utility regulated by this Commission.

that study did not explain why Arkla's net salvage values are so far out of the norm. As a result, Ms. Freier proposed an inflation adjustment as a means of addressing this issue. (T. 271) Ms. Freier's methodology for calculating net salvage on a constant dollar basis represents a departure from the historical procedure we have followed to set Arkla's depreciation rates. However, we note that the net salvage allowances recommended by Ms. Freier of -70 percent for Mains and -115 percent for Services are still significant and are in line with experience elsewhere as cited by Mr. Spanos. (T. 218-220) Moreover, the use of remaining life depreciation will ensure that Arkla will fully recover its original investment and the actual amount it incurs for negative net salvage. Accordingly, we adopt Staffs proposed net salvage values and, in tum, Staffs depreciation rates as a means of capping net salvage cost.

We agree with Ms. Freier's recommendation that depreciation should cease on all plant accounts where depreciation accruals are at or above 100 percent adjusted for net salvage. Arkla has accepted the Ms. Freier's recommendation that Arkla be required to apply the depreciation rates approved by this Commission to each of its accounts whether is direct-assigned allocated, general or shared, with the condition that it be allowed to use fixed life depreciation for certain general plant assets. (T. 978-979) Given the low dollar value of these assets, this is reasonable and is accepted. Finally, we hereby require Arkla to implement the new reporting requirements proposed by Ms. Freier. We are concerned about the issues that have arisen with regard to plant accounting under Arkla's new SAP accounting system ("SAP") and will take this opportunity to ensure that they are corrected. Accordingly, Arkla is directed to:

- Retain both electronically and in hard-copy format, the data that was ultimately provided in the responses to Staff data requests AUD-057 and AUD-058, to be used in future depreciation studies, as well as to keep the same level of data going forward.

  Perform an analysis and produce a report that 1) identifies each and every missing retirement for all accounts other than mains and services since **SAP** was implemented; 2) describes the processes followed in identifying and reporting the missing data; and 3) provides any source documents that were relied upon. This report should be filed with the Commission by March 31, 2006.

- File data annually that would support a depreciation study, including by activity year, plant additions by vintage, retirements by vintage, salvage and cost of removal by individual plant account, for the preceding calendar year. The first submission should be filed by March 31, 2006, and include the two years of data for 2004 and 2005, and thereafter include one year of data.

IS-65 Test Year Audit Sampling

For purposes of this proceeding, Staff and Arkla agreed to utilize sampling to evaluate the amount of costs included in Arkla's test year that are not properly recovered from ratepayers. At pages 22 through 25 of her Prepared Testimony, Staff witness Fritchman described the problems that Staff encountered in obtaining the necessary sampling and conducting its audit in a timely manner. Because of these difficulties, Staff was unable to complete its review prior to its direct testimony. Accordingly, Ms. Fritchman proposed to eliminate $1,580,576 from test year

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	)	
v.	)	**R-2025-3059428**
National Fuel Gas Distribution Corporation	)	

Surrebuttal Testimony and Exhibit of

Brian C. Andrews

OCA Statement 4-SR

On behalf of

Pennsylvania Office of Consumer Advocate

Date Served: May 27, 2026

BRUBAKER & ASSOCIATES, INC.

Project 12029

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	)	
v.	)	**R-2025-3059428**
National Fuel Gas Distribution Corporation	)	

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EXHIBIT BCA-1-SR: NATIONAL FUEL RESPONSE TO OCA 20-2

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	)	
v.	)	**R-2025-3059428**
National Fuel Gas Distribution Corporation	)	

Surrebuttal Testimony of Brian C. Andrews

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A Brian C. Andrews. My business address is 16690 Swingley Ridge Road, Suite 140, Chesterfield, MO 63017.

Q ARE YOU THE SAME BRIAN C. ANDREWS WHO PREVIOUSLY FILED DIRECT TESTIMONY IN THIS PROCEEDING ON BEHALF OF THE PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE ("OCA")?

A Yes, I am.

Q WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A The purpose of my surrebuttal testimony is to respond to the rebuttal testimony of National Fuel Gas Distribution Corporation's ("National Fuel" or the "Company") witness John Spanos (Statement No. 8-R) and to reiterate my support for, and recommendation of, the use of the Average Life Group ("ALG") procedure to calculate depreciation rates for National Fuel.

My silence in regard to any issue should not be construed as an endorsement of or acquiescence to any parties' positions raised in their direct or rebuttal testimonies.

SUMMARY OF RECOMMENDATIONS

Q PLEASE SUMMARIZE YOUR CONCLUSIONS AND RECOMMENDATIONS.

A My conclusions and recommendations are as follows:

1. I continue to recommend that the depreciation rates for National Fuel be calculated using the Average Life Group ("ALG") procedure. The ALG procedure is the most commonly used depreciation procedure in the country and provides National Fuel with full recovery of its investment, while resulting in more reasonable depreciation rates.

2. Mr. Spanos concedes that both the ALG and Equal Life Group ("ELG") procedures are designed to recover the total service value of an asset over the asset's service life. Mr. Spanos further concedes that if the Company were to switch from ELG to ALG there would be a short-term benefit to current customers.[1] Both procedures ensure full cost recovery for the utility; the only question is how the timing of that cost recovery is allocated among generations of customers.

3. The precision associated with the ELG procedure only exists in theory. The survivor curve selected by National Fuel for its largest account, Account 376.1 (Mains, Excluding Cathodic Protection), does not closely match the Company's actual retirement experience, which means the ELG procedure's allocation of cost among equal life groups will not reflect reality.

4. The record in this proceeding is materially different from the record before the Commission in Docket No. R-2025-3053499 (Columbia Gas) in important respects, and the evidence and arguments presented here provide additional support for the adoption of ALG that was not before the Commission in that proceeding.

5. Mr. Spanos's own analysis in Exhibit No. JJS-R1 demonstrates that the ALG procedure produces lower revenue requirements for National Fuel's customers through approximately 2038. When the time value of money is considered, the purported long-run advantage of ELG is significantly overstated, because a dollar of savings today has substantially greater purchasing power than a dollar of savings in the 2040s.

6. Mr. Spanos's comparable utility exhibit (Exhibit No. JJS-R2) provides no meaningful basis for comparison. The exhibit lists 16 anonymous companies with

[1] Spanos Rebuttal at page 16, lines 8-10.

no information regarding their depreciation procedures, service lives, net salvage rates, average age of plant, or plant-to-reserve ratios, despite Mr. Spanos testifying that all of these factors must be considered when comparing depreciation rates across utilities.

7. National Fuel is in a higher-than-average investment cycle, a fact that Mr. Spanos concedes.[2] The use of the ALG procedure can mitigate the rate increases associated with National Fuel's accelerated investment without any adverse impact on the utility's ability to recover its prudent investments.

8. The PUC should approve the depreciation rates that are presented in Exhibit BCA-2.

RESPONSE TO THE REBUTTAL TESTIMONY OF JOHN J. SPANOS

Q MR. SPANOS CHARACTERIZES YOUR TESTIMONY AS AN "EXCESSIVE REDUCTION OF DEPRECIATION EXPENSE" AND CLAIMS THAT YOU "CLEARLY IGNORE ALL OF THE COMPONENTS OF HOW DEPRECIATION RATES ARE ESTABLISHED IN PENNSYLVANIA."[3] PLEASE RESPOND.

A I disagree with Mr. Spanos's characterization. In preparing my direct testimony, I reviewed the depreciation study that Mr. Spanos prepared for National Fuel, including the service life estimates, the net salvage parameters, and the depreciation technique. After reviewing these parameters, I determined that reasonable adjustments to service lives and net salvage rates were not warranted, and I accepted all of the Company's proposed life and net salvage parameters. The only change I recommended is the use of the ALG grouping procedure rather than the ELG grouping procedure.

Mr. Spanos's claim that I ignored the components of depreciation rate development is inaccurate. Choosing not to propose changes to specific parameters

[2]Spanos Rebuttal at page 25, line 3.
[3]Spanos Rebuttal at page 2, lines 16-20.

after reviewing them is not the same as ignoring them. I explicitly discussed Pennsylvania's unique treatment of net salvage as a five-year amortization of actual costs of removal rather than inclusion in depreciation rates, and I explained why this treatment causes Pennsylvania depreciation rates to appear lower than rates in other jurisdictions.[4] I also explicitly proposed the use of the remaining life technique.[5] Mr. Spanos's assertion that I ignored these factors is simply not supported by the record.

Q MR. SPANOS STATES ON PAGE 23 THAT YOU DO NOT CONSIDER "HOW CLOSE THE THEORETICAL RESERVE TO BOOK RESERVE VARIANCE IS." PLEASE RESPOND.

A The theoretical reserve to book reserve variance is a measure of how closely the accumulated depreciation on the utility's books matches what would have been accumulated if the currently proposed depreciation parameters had been in place throughout the history of the property. A small variance suggests that the parameters in place over time have produced a reasonable pattern of cost recovery. I do not dispute that observation. However, the theoretical reserve to book reserve variance reflects the cumulative effect of all depreciation parameters, including the ELG procedure, that have been in place over the past forty years. The fact that the variance is small when measured against parameters that include ELG does not demonstrate that ELG is the correct procedure going forward; it demonstrates that the recovery pattern to date has been internally consistent with the parameters that were in place. The question before

[4]Direct Testimony of Brian C. Andrews at pages 36-37.
[5]Direct Testimony of Brian C. Andrews, Exhibit BCA-2.

the Commission is whether those parameters, specifically the ELG procedure, should continue to be used, and the variance does not answer that question.

Q MR. SPANOS PROVIDES CITATIONS TO AUTHORITATIVE DEPRECIATION TEXTS BY ROBLEY WINFREY AND WOLF & FITCH, WHICH REFER TO THE ELG PROCEDURE AS "THE ONLY MATHEMATICALLY CORRECT PROCEDURE" AND STATE THAT ELG IS "GENERALLY CONSIDERED TO BETTER MATCH THE CONSUMPTION OF CAPITAL WITH SERVICE PROVIDED" THAN THE ALG PROCEDURE.[6] PLEASE RESPOND.

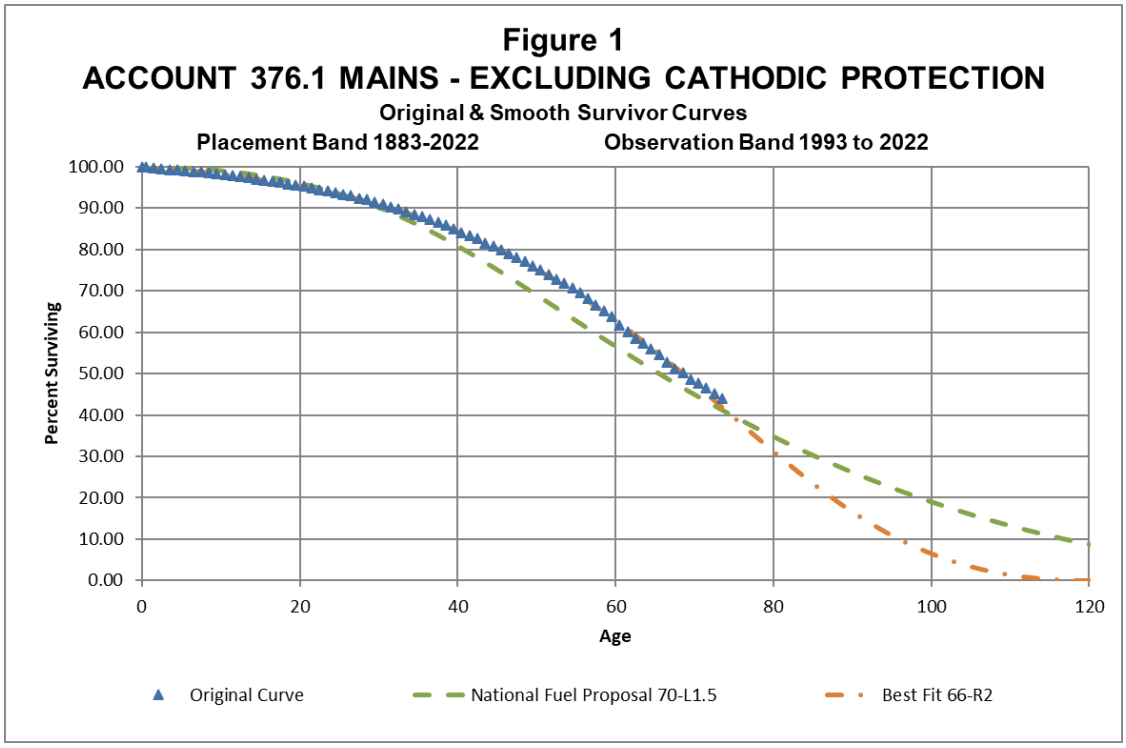
A I do not disagree that these statements are made within these authoritative texts. I acknowledged these same citations in my direct testimony.[7] While the ELG method may be more precise mathematically, this precision only exists in theory, as it is extremely sensitive to the survivor curve that is used to determine the depreciation rates. The depreciation expense calculated under ELG is accurate if and only if the utility property retires in exactly the manner dictated by the survivor curves used to calculate the ELG rates. This precision does not exist in real life.

To illustrate this point, I have examined the survivor curve that National Fuel has selected for Account 376.1 (Mains, Excluding Cathodic Protection), which is the largest single sub-account in the depreciation study. Account 376.1 represents approximately $426.7 million, or 45%, of National Fuel's $955.9 million gas

[6]Spanos Rebuttal at page 4, lines 9-14.
[7]Direct Testimony of Brian C. Andrews at page 29, lines 3-6.

plant-in-service, and it represents 32% of National Fuel's proposed 2027 gas plant depreciation expense.[8] National Fuel proposes the 70-L1.5 survivor curve for this account.

In Figure 1, I present National Fuel's original retirement data for Account 376.1 compared to the proposed 70-L1.5 survivor curve.



Q WHAT IS THE SIGNIFICANCE OF THIS FIGURE?

A Mr. Spanos claims that the ELG procedure is more accurate, but this is true if and only if property retires exactly as dictated by the survivor curve. Figure 1 demonstrates that the 70-L1.5 survivor curve that National Fuel proposes for Account 376.1 does not closely match the Company's actual retirement experience, particularly in the middle

[8]Direct Testimony of Brian C. Andrews at page 26, line 20 – page 27, line 1.

section of the curve. The original data points diverge from the 70-L1.5 curve notably in the range of approximately 30 to 80 years of age, where the actual data consistently lies above the proposed curve, indicating that assets are retiring somewhat slower than the 70-L1.5 curve predicts.

In discussing how an analyst should approach selecting a survivor curve, Wolf & Fitch state in *Depreciation Systems*, "Often the middle section of the curve (that section ranging from approximately 80% to 20% surviving) is given more weight than the first and last sections. This middle section is relatively straight and is the portion of the curve that often best characterizes the survivor curve."[9] The 70-L1.5 does not closely track the actual retirement data in this critical middle section.

I would note that I am not challenging the service life selection made by Mr. Spanos. The best fit curve, a 66-R2, has a shorter average service life, and I have accepted National Fuel's proposed life parameters. The point I am making is that the mathematical precision that is the entire theoretical justification for the ELG procedure can only be achieved if assets retire in the exact manner indicated by the survivor curve. Figure 1 demonstrates that this precision does not exist for National Fuel's largest account, which means the ELG procedure's allocation of cost among equal life groups will not match reality for nearly half of National Fuel's gas plant-in-service.

[9]Frank K. Wolf and W. Chester Fitch, *Depreciation Systems* (Ames, IA: Iowa State University Press, 1994), p. 46-47.

Q MR. SPANOS STATES ON PAGE 8 THAT "THE ELG PROCEDURE RECOGNIZES THE REALITY OF DISPERSION." PLEASE RESPOND.

A The ALG procedure also recognizes the reality of dispersion. The entire purpose of using Iowa survivor curves in the ALG procedure is to model the dispersion pattern of property retirements within an account. Both procedures use the same survivor curves, and both procedures recognize that assets within an account will retire at ages ranging from well before the average service life to well after it. The difference between the procedures is how they handle that dispersion: the ELG procedure attempts to assign specific depreciation rates to specific life groups within the curve, while the ALG procedure uses the average of the dispersion pattern to set a single depreciation rate for the group. Mr. Spanos's suggestion that ELG is unique in recognizing dispersion is incorrect.

Q MR. SPANOS USES THE TERMS "EXPECTED LIFE," "APPROXIMATES THE RESULT," AND "ACTUAL LIVES FORECAST BY THE ESTIMATED SURVIVOR CURVE" IN DESCRIBING THE ELG PROCEDURE.[10] PLEASE COMMENT.

A Mr. Spanos's own language reveals the fundamental limitation of the ELG procedure. The lives used in the ELG calculation are not actual lives; they are expected lives, estimated lives, and forecasted lives, all of which are derived from the selected survivor curve. There is no guarantee that the actual life of each asset will match the life forecast by the survivor curve. As Mr. Spanos himself states on page 18 of his rebuttal

[10]Spanos Rebuttal at pages 9-10.

testimony, "in real-world operations, circumstances can change such that assets are retired earlier than expected." This acknowledgment undermines the claimed precision of the ELG procedure: if circumstances can and do change such that assets are retired at times different than expected, then the precise allocation of cost among equal life groups that the ELG procedure relies on will not match the actual pattern of retirements. The ALG procedure is better equipped to handle this reality because it depreciates all assets based on the average life of the group, rather than attempting to assign individual costs to individual life groups based on forecasts that Mr. Spanos himself acknowledges may not materialize.

Q HAS MR. SPANOS CONFIRMED THAT BOTH THE ALG AND ELG PROCEDURES RECOVER THE TOTAL SERVICE VALUE OF AN ASSET OVER ITS SERVICE LIFE?

A Yes. On page 19, lines 17-20 of his rebuttal testimony, Mr. Spanos states, "Both procedures are designed to recover the total service value of an asset over the asset's service life." This is a critically important concession. It confirms that the ALG procedure I have recommended will fully recover National Fuel's prudent investments over the life of its assets. The utility's financial integrity is not at risk under the ALG procedure; the only difference between the two procedures is the timing of cost recovery, not the total amount recovered.

Q HAS MR. SPANOS CONFIRMED THAT SWITCHING FROM ELG TO ALG WOULD PROVIDE A BENEFIT TO CURRENT CUSTOMERS?

A Yes. On page 16, lines 8-10 of his rebuttal testimony, Mr. Spanos states, "It is correct to assume that if the Company were to switch from ELG to ALG there would be a short-term benefit to current customers." When paired with Mr. Spanos's concession that both procedures recover the total service value of an asset, the conclusion is straightforward: both procedures ensure that the utility recovers its full investment, but the ALG procedure does so in a manner that provides immediate, measurable relief to customers who are facing rate increases driven by an accelerated investment cycle. In a period of affordability concern and elevated infrastructure investment, the procedure that provides near-term relief while still ensuring full cost recovery is the more reasonable choice for establishing depreciation rates.

Q MR. SPANOS CITES THE COMMISSION'S OPINION AND ORDER IN DOCKET NO. R-2025-3053499, IN WHICH THE COMMISSION REJECTED THE OCA'S PROPOSAL TO ADOPT THE ALG PROCEDURE FOR COLUMBIA GAS OF PENNSYLVANIA.[11] PLEASE RESPOND.

A I am aware of the Commission's decision in the Columbia Gas proceeding, and I have reviewed it carefully. While I respect the Commission's decision in that proceeding, the record before the Commission in this case is materially different from the record in the Columbia Gas case in several important respects, and the evidence and arguments

[11]Spanos Rebuttal at page 13.

presented here provide additional support for the adoption of ALG that was not before the Commission in that proceeding.

Q PLEASE EXPLAIN HOW THE RECORD IN THIS PROCEEDING DIFFERS FROM THE COLUMBIA GAS PROCEEDING.

A The Commission's decision in the Columbia Gas proceeding was influenced by a significant methodological criticism of the OCA's depreciation witness in that case, Mr. Garrett. Specifically, the Commission noted that Mr. Spanos's "main criticism was that Mr. Garrett applied the ASL depreciation procedure but continued to use book reserve balances developed under the ELG procedure."[12] The Commission found this methodological inconsistency to be a factor in its decision to reject the OCA's proposal.

That criticism does not apply to my analysis in this proceeding. In my direct testimony, I presented a reserve bringforward of accumulated depreciation from September 30, 2025 to October 31, 2027 based on the ALG procedure, which I provided in Exhibit BCA-1.[13] My recommended annual depreciation expense and accumulated depreciation are calculated on a reasonably consistent basis, which is required under Pennsylvania law.[14] Mr. Spanos does not challenge my reserve bringforward or identify any methodological inconsistency in my analysis in this proceeding, because none exists. This is a material difference from the Columbia Gas record.

In addition, this proceeding presents arguments and evidence that were not before the Commission in the Columbia Gas case. These include the time value of

[12]Pa. PUC v. Columbia Gas of Pennsylvania, Inc., Docket No. R-2025-3053499, Opinion and Order at pages 110-111.
[13]Direct Testimony of Brian C. Andrews at page 35, lines 2-5.
[14]Pa. Power & Light Co. v. Pa. Pub. Util. Com., 311 A.2d 151, 158 (Pa. Cmwlth. 1973).

money analysis I present later in this testimony, the specific demonstration that National Fuel's selected survivor curve for its largest account does not closely match the Company's actual retirement experience, and the identification of specific concessions by Mr. Spanos that both procedures recover the full service value of assets and that switching to ALG would provide a short-term benefit to current customers. These considerations provide the Commission with additional support for the adoption of the ALG procedure that the record in the Columbia Gas proceeding did not contain.

Q THE COLUMBIA GAS ORDER STATES THAT THE BENEFIT OF ALG IS "A RESULT OF THE PROPOSED CHANGE IN PROCEDURE" RATHER THAN THE PROCEDURE ITSELF.[15] PLEASE RESPOND.

A The fact that the customer benefit comes from changing the procedure does not diminish its value to customers. Every time the Commission adjusts a depreciation parameter, whether it is a service life, a net salvage rate, or a grouping procedure, the resulting impact on rates is the product of the change. That is inherent in any regulatory adjustment, and it does not mean the change is unjustified. The relevant question is whether the change produces more reasonable rates going forward, and for the reasons I have set forth in my direct testimony and in this surrebuttal testimony, the ALG procedure produces more reasonable depreciation rates for National Fuel.

I would also note that the Commission's observation that ALG produces lower customer rates in the near term is fully consistent with my recommendation. Mr. Spanos

[15]Pa. PUC v. Columbia Gas of Pennsylvania, Inc., Docket No. R-2025-3053499, Opinion and Order at page 108.

concedes that both procedures recover the total service value of the asset,[16] which means the utility is made whole under either procedure. The question is which procedure better serves customers, and the answer is the procedure that provides more affordable rates during a period of accelerated investment and rising costs, while still ensuring full cost recovery for the utility.

Q MR. SPANOS ARGUES THAT HIGHER DEPRECIATION EXPENSE UNDER ELG LEADS TO HIGHER ACCUMULATED DEPRECIATION, LOWER RATE BASE, AND ULTIMATELY LOWER CUSTOMER RATES OVER TIME.[17] HAS HE PROVIDED AN ANALYSIS TO SUPPORT THIS CLAIM?

A Yes. Mr. Spanos has provided an analysis in Exhibit No. JJS-R1, which forecasts plant and reserve balances for National Fuel through 2050 under two scenarios: one adopting the ALG procedure and the other maintaining the currently-approved ELG procedure. Mr. Spanos also provides Figure 3 on page 17 of his rebuttal testimony, which shows a comparison of estimated revenue requirements through 2050 under each scenario.

Q PLEASE COMMENT ON MR. SPANOS'S ANALYSIS.

A Mr. Spanos's own analysis demonstrates that the ALG procedure produces lower revenue requirements for National Fuel's customers through approximately 2037. This means that for approximately the next 11 years, customers would pay less under the ALG procedure than under the ELG procedure. Mr. Spanos characterizes the benefit of

[16]Spanos Rebuttal at page 19, lines 17-20.
[17]Spanos Rebuttal at pages 15-16.

ALG as "short-term," but 11 years of lower utility bills is a substantial benefit to customers who are experiencing rate increases and facing affordability concerns today.

Beyond the crossover point around 2037, Mr. Spanos projects that ALG would produce marginally higher revenue requirements than ELG. However, these long-range projections are based on speculative assumptions about plant activity, retirements, and rate of return extending 25 years into the future. The assumptions embedded in this forecast drive the result, and there is no way to verify whether those assumptions will prove accurate over a quarter-century time horizon. In contrast, the near-term benefit of the ALG procedure is real and measurable.

Q IS THERE AN ADDITIONAL CONSIDERATION THAT MR. SPANOS'S ANALYSIS DOES NOT ACCOUNT FOR?

A Yes. Mr. Spanos's revenue requirement comparison treats a dollar of savings in 2026 as equivalent to a dollar of cost in 2050, but this fails to account for the time value of money. Due to inflation, the purchasing power of a dollar erodes over time. At a 3% inflation rate, which is consistent with recent experience, the purchasing power of a dollar declines as follows:

- By 2030 (4 years from now), a dollar will have the purchasing power of approximately $0.89 in today's dollars.
- By 2035 (9 years from now), approximately $0.77.
- By 2037 (11 years from now, the approximate crossover point in Mr. Spanos's analysis), approximately $0.72.
- By 2045 (19 years from now), approximately $0.57.
- By 2050 (24 years from now, the end of Mr. Spanos's projection), approximately $0.49.

The ALG procedure produces lower revenue requirements during the period when customers' dollars have the greatest purchasing power, and the higher revenue requirements that Mr. Spanos projects under ALG in later years are in dollars that are worth substantially less. By the end of Mr. Spanos's projection period, a dollar of savings would be worth less than half of what it is worth today. Savings to customers today are always more valuable than savings in the future, because the purchasing power of those future savings is diminished by inflation. Mr. Spanos's analysis does not account for this fundamental economic reality.

Q IS THERE ANYTHING ELSE YOU WOULD LIKE TO NOTE REGARDING MR. SPANOS'S REVENUE REQUIREMENT ANALYSIS?

A Yes. Mr. Spanos's analysis assumes a static regulatory environment in which depreciation rates, plant activity, and rate of return remain on a fixed trajectory through 2050. In reality, National Fuel will continue to file rate cases and depreciation studies, and depreciation rates will be updated periodically to reflect current conditions. Mr. Spanos's long-range comparison is a theoretical exercise that does not reflect how ratemaking actually works. Each time new rates are set, the accumulated depreciation balances, plant balances, and depreciation rates are all updated. The theoretical long-run disadvantage that Mr. Spanos projects under ALG assumes that no such updates occur, which is inconsistent with actual regulatory practice.

While National Fuel has filed just three rates cases over the past 20 years, I would expect that with the continued elevated level of infrastructure investment that rate case filings would be more routine going forward. It would be reasonable to assume

that National Fuel would file rate cases approximately every three years (the most recent prior case was in 2022, and the instant case was filed in 2025). With this frequency of rate case filings, depreciation rates are regularly updated to reflect current plant and reserve conditions, which further diminishes the relevance of 25-year revenue requirement projections.

Q MR. SPANOS CLAIMS THAT THE ALG PROCEDURE PRODUCES INTERGENERATIONAL INEQUITY BECAUSE CUSTOMERS PAY FOR ASSETS FROM WHICH THEY RECEIVE NO SERVICE.[18] PLEASE RESPOND.

A Mr. Spanos identifies two concepts of intergenerational equity: the inequity of customers paying for retired assets, and the inequity of uneven distribution of depreciation charges over the life of an asset. He argues that the first form is more detrimental than the second.[19]

I would note several points in response. First, the concern about customers paying for retired assets under ALG is addressed by the Remaining Life Technique, which both Mr. Spanos and I use. The Remaining Life Technique is self-correcting: any over-accumulations or under-accumulations due to the use of the average life are automatically spread over the remaining life of the account in subsequent depreciation studies. This means that the theoretical concern about stranded cost recovery under

[18]Spanos Rebuttal at pages 18-21.
[19]Spanos Rebuttal at page 18, lines 1-20.

ALG is mitigated through the regular updating of depreciation rates, which as I noted above occurs on a regular basis for National Fuel.

Second, Mr. Spanos's own testimony acknowledges that "in real-world operations, circumstances can change such that assets are retired earlier than expected."[20] This acknowledgment applies equally to the ELG procedure: if assets are retired at times different than the survivor curve predicts (which Mr. Spanos concedes will happen), then the ELG procedure's allocation of cost among equal life groups will also be incorrect, and the claimed intergenerational equity advantage of ELG does not materialize in practice.

Third, Mr. Spanos's focus on the first form of intergenerational equity (paying for retired assets) overlooks the fact that the ELG procedure creates the second form of intergenerational equity (front-loading depreciation expense). As I stated in my direct testimony, the ELG method assigns more depreciation expense to customers that take service early in the asset's service life and reduces the expense to customers toward the end of the asset's service life.[21] Mr. Spanos does not dispute this characterization. In the current environment, where National Fuel is in a higher-than-average investment cycle and the majority of its assets are relatively young (average age of 19.9 years for a company with a 70-year average service life for its largest accounts), the front-loading effect of ELG is particularly pronounced.

[20]Spanos Rebuttal at page 18, lines 8-9.
[21]Direct Testimony of Brian C. Andrews at page 3, lines 17-19.

Q MR. SPANOS HAS PROVIDED EXHIBIT NO. JJS-R2, WHICH PURPORTS TO SHOW COMPOSITE DEPRECIATION RATES OF COMPARABLE GAS DISTRIBUTION UTILITIES.[22] PLEASE RESPOND.

A Mr. Spanos has provided a list of 16 gas distribution utilities in Exhibit No. JJS-R2, identified only as "Company 01" through "Company 16," with composite depreciation rates averaging 2.73%. From this, he concludes that the composite 2.45% depreciation rate that National Fuel proposes (and the 1.96% rate that I recommend) are comparable or unreasonably low, respectively.

This exhibit provides no meaningful basis for comparison. Mr. Spanos himself testifies on page 22 of his rebuttal testimony that depreciation rates are determined by many factors, including service life, net salvage percentage, depreciation procedure and method, plant-to-reserve ratio, and age of surviving plant, and that "you must consider all of these factors when comparing to other utilities within the same state as well as those in other state jurisdictions."[23] Yet Mr. Spanos's own exhibit provides none of this information. The exhibit does not identify the utilities by name, does not state whether ELG or ALG was used, does not indicate whether net salvage is included in the composite rates, does not provide service lives, does not provide average age of plant, and does not provide plant-to-reserve ratios. Mr. Spanos has established the requirements for a valid comparison and then failed to satisfy any of them in his own exhibit.

[22]Spanos Rebuttal at pages 25-26.
[23]Spanos Rebuttal at page 22, lines 12-24.

Further, the composite rates shown in Exhibit JJS-R2 include a net salvage component for 13 of the 16 companies,[24] because Pennsylvania is unique in excluding net salvage from depreciation rates. Including net salvage increases depreciation rates. Mr. Spanos concedes this point on page 26 of his rebuttal testimony when he states that "including a net salvage accrual like other jurisdictions would significantly increase the annual depreciation rate." As I explained in my direct testimony, for gas utilities, the net salvage rate for mains can range from approximately -40% to well past -100%, meaning that for every dollar invested in mains, the utility would recover $1.40 to over $2.00 through depreciation expense in jurisdictions that include net salvage.[25] If net salvage were included in National Fuel's depreciation rates at even a moderate level, the composite rate would increase significantly and would likely exceed Mr. Spanos's "comparable" average.

For these reasons, the Commission should give Exhibit JJS-R2 no weight in its evaluation of the appropriate depreciation procedure for National Fuel.

Q MR. SPANOS ARGUES THAT THE INDIANA AND KENTUCKY DECISIONS YOU CITED IN YOUR DIRECT TESTIMONY ARE NOT APPLICABLE BECAUSE THEY INVOLVE ELECTRIC UTILITIES WITH "SIGNIFICANTLY DIFFERENT ASSETS. "[26] PLEASE RESPOND.

A Mr. Spanos's dismissal of these decisions is not well founded. The IURC's decision in the Duke Energy Indiana case explicitly addressed the relative impact of the

[24]See Exhibit BCA-1-SR for National Fuel's response to OCA 20-2.
[25]Direct Testimony of Brian C. Andrews at page 36, lines 7-9.
[26]Spanos Rebuttal at page 24, lines 3-7.

ELG-to-ALG methodology change across different asset categories and stated that "the impact of the methodology change on a percentage basis is markedly more significant for the distribution and transmission components than the production, or generation, component."[27] In other words, the IURC specifically found that the distribution infrastructure was the category of assets most affected by the choice of procedure. National Fuel's system consists entirely of gas distribution and transmission infrastructure. The IURC's reasoning is directly applicable to this proceeding.

The Kentucky PSC decision in the Duke Kentucky case addresses the general concept that under the ELG method, the "capital recovery periods are accelerated and shortened" resulting in higher depreciation rates, and the "ALG procedure is as accurate as the ELG procedure" and "smooths the data" for constant and consistent group rates. The PSC also noted the ELG procedure front-loads the depreciation expense and does not accurately match the revenues and expenses.[28] All of these discussion points are certainly applicable, as the recovery of expenses and the matching of revenues and expenses is relevant regardless of whether the utility supplies electricity or natural gas.

Further, the Arkansas PSC decision that I provided in my direct testimony as Exhibit BCA-6 involved Centerpoint Energy Arkla, a natural gas distribution utility, not an electric utility. The Arkansas PSC rejected ELG in favor of ALG for a gas distribution company, stating that "ELG will continue to result in higher depreciation rates and expense as long as a utility's plant continues to grow" and concluding that

[27]IURC Final Order in Docket No. 45253 at page 90.
[28]Kentucky PSC Final Order, Case No. 2017-00321, at page 26.

"ALG better balances the interests of shareholders and ratepayers."[29] Mr. Spanos does not address the Arkansas decision in his rebuttal testimony.

The relevance of these out-of-state decisions is not that Pennsylvania should adopt the exact depreciation parameters used in other jurisdictions. The relevance is that other commissions, including one with longstanding ELG precedent (Indiana), have evaluated the same procedural question on the merits and concluded that ALG produces more reasonable rates in a higher-than-average investment environment. The Commission can and should consider these decisions as part of the overall body of evidence before it.

Q MR. SPANOS STATES THAT YOU HAVE NOT OFFERED ANY NEW SUPPORT FOR YOUR ALG PROPOSAL THAT WAS NOT ALREADY PROVIDED IN OTHER RECENT PENNSYLVANIA CASES.[30] PLEASE RESPOND.

A Mr. Spanos has likewise not offered any new rebuttal arguments. His testimony in this case contains the same two-unit example, the same dispersion argument, the same rate base revenue requirement exhibit format, and the same anonymous comparable utility exhibit that he has presented in prior proceedings. If Mr. Spanos's standard is that the challenging party must present something new, then by the same logic the defending party should be held to the same standard.

[29]Arkansas PSC Final Order, Docket No. 04-121-U, at page 29.
[30]Spanos Rebuttal at page 13, lines 20-25.

However, the appropriate standard is not novelty; it is whether the evidence supports the requested relief. National Fuel's continued use of the ELG procedure is unreasonable under current conditions. The evidence I have presented, including the front-loading effect of ELG during an accelerated investment cycle, the fact that ELG shortens the effective recovery period for National Fuel's assets well below the average service lives that the Company itself supports, the fact that both procedures recover the total service value (as Mr. Spanos concedes), and the fact that National Fuel itself uses the ALG procedure in every other jurisdiction in which it operates, constitutes substantial support for the adoption of ALG.

I would finally like to point out that in the previous two cases in Pennsylvania where I have recommended the switch to ALG deprecation, both of those cases settled, and the Commission did not consider or submit a ruling regarding my arguments in favor of ALG and against ELG.

Q PLEASE COMMENT ON MR. SPANOS'S RESPONSE TO YOUR DISCUSSION OF THE HIGHER-THAN-AVERAGE INVESTMENT CYCLE.

A Mr. Spanos concedes that National Fuel is experiencing a higher-than-average investment cycle.[31] He argues that this is due to the replacement of older pipe rather than high growth, and that the investment plan is consistent with others in the area.

The cause of the higher-than-average investment cycle is not relevant to the question of how depreciation rates should be calculated. Whether the increased investment is driven by infrastructure replacement, system expansion, or rising material

[31]Spanos Rebuttal at page 25, line 3.

costs, the effect on customers is the same: rate base is growing, revenue requirements are increasing, and the ELG procedure compounds these increases by front-loading depreciation expense. Mr. Spanos acknowledges that the cost of materials is much higher,[32] which reinforces the point that National Fuel is in an elevated investment environment regardless of the underlying cause.

As I discussed in my direct testimony, National Fuel's plant-in-service has increased approximately 30% over five years, the Company implemented a DSIC in January 2025 and reached the 5% cap on distribution revenues within approximately 14 months (necessitating this rate case), the Company projects continued elevated capital spending through at least 2039, and the average age of National Fuel's investment is just 19.9 years despite the Company having operated for well over a century.[33] The IURC concluded that "the use of ELG in a higher than average investment cycle has the effect of unnecessarily increasing the near term depreciation expense as compared to the use of ALG."[34] That reasoning applies here, regardless of whether the investment cycle is driven by replacement or growth.

Q MR. SPANOS NOTES THAT THE COMPANY'S COMPOSITE ELG DEPRECIATION RATE DECREASED FROM THE HISTORIC TEST YEAR TO THE FULLY PROJECTED FUTURE TEST YEAR.[35] PLEASE RESPOND.

A This observation does not support Mr. Spanos's position. The ELG composite rate for National Fuel's three test year periods is 2.50% (HTY), 2.36% (FTY), and

[32]Spanos Rebuttal at page 25, line 5.
[33]Direct Testimony of Brian C. Andrews at pages 13-14.
[34]IURC Final Order in Docket No. 45253 at page 90.
[35]Spanos Rebuttal at page 23, lines 17-18.

2.45% (FPFTY). Under the ALG procedure, the composite rates for the same periods are 2.03%, 1.90%, and 1.96%. The two sets of rates follow the same directional trend, declining from the HTY to the FTY and then increasing slightly in the FPFTY relative to the FTY. The spread between ELG and ALG rates remains approximately 0.47% to 0.49% across all three periods. The trend that Mr. Spanos identifies is not an attribute of the ELG procedure; it reflects the changing composition of plant and reserves over those years, and the same trend exists under ALG. This observation does not provide any basis for preferring one procedure over the other.

CONCLUSION

Q PLEASE SUMMARIZE YOUR CONCLUSIONS AND RECOMMENDATIONS.

A I continue to recommend the PUC approve the use of the ALG procedure in this case. The arguments presented in Mr. Spanos's rebuttal testimony do not contain convincing evidence that the ELG procedure is in the best interests of National Fuel's customers, nor that the depreciation rates produced under the ALG procedure are unreasonable. Both procedures ensure that the utility recovers its full investment, but the ALG procedure does so in a manner that provides immediate, measurable relief to customers who are facing rate increases driven by an accelerated investment cycle

The precision required for the theoretical justification of the ELG procedure only exists if the assets retire in the exact same manner as the survivor curve indicates. As I've shown, this precision does not exist with National Fuel's assets.

Mr. Spanos's revenue requirement analysis regarding the ELG vs. ALG does not provide compelling evidence. The analysis assumes a static regulatory environment

and does not account for the time value of money and the erosion of the purchasing power of a dollar overtime.

Mr. Spanos's comparable utility exhibit (Exhibit No. JJS-R2) provides no meaningful basis for comparison, listing anonymous companies with no information regarding their depreciation procedures, service lives, net salvage rates, average age of plant, or plant-to-reserve ratios.

Finally, National Fuel is in a higher-than-average investment cycle, a fact that Mr. Spanos concedes. The use of the ALG procedure can mitigate the rate increases associated with National Fuel's accelerated investment without any adverse impact on the utility's ability to recover its prudent investments.

For all of the reasons discussed within my direct and surrebuttal testimonies, the PUC should reject the continued use of the ELG procedure and approve the depreciation rates that are presented in Exhibit BCA-2.

Q DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

A Yes, it does.

573468

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please refer to exhibit JJS-R2 and answer or provide the following: a. Please identify each of the 16 companies; b. Please explain if these 16 companies include net salvage in their depreciation rates; and c. For each Company, please provide the summary table of estimated survivor curve, original cost, book depreciation reserve and calculated annual depreciation accruals that supports the composite depreciation rates shown in the exhibit, similar to Table 1 in Mr. Spanos' depreciation studies (National Fuel Exhibit C). d. Please identify the grouping procedure used for each of the 16 companies.

Response

a.) The attached document, OCA 20-2 Attachment xlsx, sets forth a listing of the 16 companies that were included in the exhibit JJS-R2. The composite rates are deliberately not matched to the Company name.
b.) All Companies include net salvage in their depreciation rates except for the Pennsylvania companies: Columbia Gas of Pa, UGI Utilities and Peoples Natural Gas.
c.) The summary tables of each Company can be found in their most recent filing within their jurisdiction.
d.) As previously discussed there is more to determining a depreciation rate than the depreciation procedure. Some of the companies are whole life or remaining life technique, some have a net salvage component in their rates, if not in Pennsylvania and some have a reserve to plant ratio that is high or low. The gas companies that have rates based on the ELG procedure or some vintages based on the Equal Life Group procedure in this list are Black Hills Colorado Gas, Columbia Gas of Pa, Peoples Natural Gas and UGI Utilities.

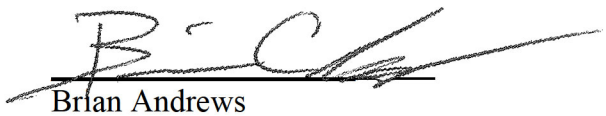
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3059428
	:	
National Fuel Gas Distribution Corp.	:	

VERIFICATION

I, Brian Andrews, hereby state that the facts above set forth in my Surrebuttal Testimony, OCA Statement 4SR, are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

DATED: May 27, 2026

Signature: 

Brian Andrews

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BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
	:	DOCKET NO. R-2025-3059428
v.	:	
NATIONAL FUEL GAS DISTRIBUTION CORP.	:	

DIRECT TESTIMONY

LeeAnn Wise

ON BEHALF OF

THE PENNSYLVNAIA

OFFICE OF CONSUMER ADVOCATE

April 16, 2026

I. INTRODUCTION AND SUMMARY

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.

A. My name is Lee Ann Wise. My business address is 555 Walnut Street, Forum Place, 5th Floor, Harrisburg, Pennsylvania 17101. I am currently employed as a Senior Regulatory Analyst by the Pennsylvania Office of Consumer Advocate (OCA).

Q. PLEASE DESCRIBE OUR EDUCATIONAL BACKGROUND AND QUALIFICATIONS TO PROVIDE TESTIMONY IN THIS CASE.

A. I have a Master's Degree in Business Administration from Shippensburg University and a Bachelor's degree in Professional Accountancy from the University of Pennsylvania. I also attended Michigan State University's Institute of Public Utilities online rate school program. I have attached my CV as LMW-1.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE PENNSYLVANIA PUBLICUTILITY COMMISSION(COMMISSION)?

A. Yes, a list of the cases I have provided testimony on can be found as LMW-2.

Q. PLEASE SUMMARIZE NATIONAL FUEL GAS DISTRIBUTION CORPORATION'S (NFGD) PROPOSAL TO INCREASE RATES IN THIS PROCEEDING.

A. NFGD serves approximately 214,000 residential customers in a 14-county area in northwestern Pennsylvania. NFGD serves the smallest number of residential customers

compared to other major natural gas distribution companies.[1] NFGD has a sister utility in New York with service territory adjacent to the Pennsylvania service territory. NFGD proposes an average 5.9% increase in its base distribution rate for residential customers. That average reflects a wide range of bill impacts based on usage and does not consider the increase in natural gas supply service that is purchased by NFGD on behalf of its customers in the wholesale market. The commodity or natural gas supply portion of the customer bill is 63% of the total bill based on usage, and approximately 70% for System Control and Planning Area's (SCPA) rates.[2] As a result, the total bill issued by NFGD that is subject to collection action and potential termination of service is significantly higher than the portion of the bill regulated in this base rate proceeding.

Q. WHAT ISSUES WILL YOU ADDRESS IN YOUR TESTIMONY?

A. I will address the following issues in these proceedings:

- NFGD's proposal to add a 25-basis-point incentive to its return on common equity.
- Customer service, including the performance of the call center, billing, meter reading, complaint handling, customer satisfaction survey results, and other metrics tracked by the Commission, along with the Company's request for a performance management increase.
- Payment Plan Performance
- Payment based fees

Q. IS YOUR TESTIMONY EXCLUSIVE TO THESE ISSUES?

[1] The other major gas distribution companies no less than twice as many or more residential customers compared to NFG. See Appendix C of the Public Utility Commission's 2024 Customer Service Performance Report issued December 2025.

[2] NFGD Statement No.19 Direct Testimony John Taylor pg. 27, ln 12-16.

A. No. While I am the primary witness on customer service and service reliability as it relates to any management award, my testimony supplements and contributes to the overall recommendations of other OCA witnesses, including Michael Dupree, Maureen Reno, Brian Andrews, and Lafayette Morgan.

Q. HOW IS YOUR ANALYSIS OF SERVICE QUALITY AND CUSTOMER SERVICE PERFORMANCE RELATED TO THE PROPOSED PERFORMANCE-BASED RATE ADJUSTMENT?

A. Any public utility must justify its proposed rates, in part, by demonstrating that it can perform its essential service quality and customer service functions at a reasonable level.[3] In this context, it is appropriate to compare the performance of NFGD to other Pennsylvania gas utilities.

My testimony is intended to provide and inform the Pennsylvania Public Utility Commission (Commission) of the reasonableness of the proposed performance rate adjustment request. When a utility seeks higher rates but exhibits deficiencies in customer service performance, the Commission may wish to evaluate, on a case-by-case basis, whether to approve a return on equity (ROE) that appropriately reflects the level of customer service delivered. Additionally, any adjustment to performance-based rates should be considered only when the utility demonstrates truly exceptional performance across all areas, supported by clear and comprehensive evidence in the record.

Q. WILL YOU PROPOSE CHANGES TO THE REVENUE REQUIREMENT OR RATES PROPOSED BY NFGD?

[3] 66 Pa.C.S. Section 1501.

A. No, not directly. My testimony regarding customer service and reliability of service performance is intended to provide additional information or insight when determining the appropriate rate of return approved by the Commission in this proceeding. It should be considered alongside the testimony of Maureen Reno, who, on behalf of the OCA, offers specific recommendations regarding the appropriate rate of return to be used in calculating the revenue requirement and resulting rates.

Q. DOES NFGD PROPOSE A HIGHER RATE OF RETURN DUE TO "MANAGEMENT EFFECTIVENESS?"

A. Yes. The filing states that NFGD has provided reliable service at low rates and identifies its safety programs, quality customer service performance, information technology and cybersecurity, affordability and operational efficiencies, universal service programs and customer payment assistance, and community engagement initiatives as reasons for deserving a performance management increase.[4] These criteria assume an 11.25% return on common equity, which includes a 25-basis-point increase in the return on common equity included in the rate increase request based on management performance.

Q. WHAT EVIDENCE IS NFGD BASING THEIR CLAIM THAT THEY ARE ENTITLED TO A MANAGEMENT PERFORMANCE ADDER?

A. NFGD bases their claim for a management performance adder on the following:

- Safety
- Customer Service
- Information technology and cyber security

[4] NFG Statement No. 1-Direct Testimony of Rebecca E. Hillery p.20, ln. 11-19.

- Affordability and Operational Effectiveness
- Universal Services and Customer Payment Assistance
- Community Engagement

Q. PLEASE SUMMARIZE YOUR OVERALL CONCLUSIONS AND RECOMMENDATIONS.

A. I recommend the following in response to NFGD's proposal to raise distribution rates in this proceeding:

- NFGD's request for a higher rate of return based on management performance should be denied. NFGD has not provided documented evidence of superior managerial and customer service performance that would warrant a reward or additional adjustment to its authorized rate of return. NFGD has not demonstrated that its service levels exceed established standards or materially outperform reasonable expectations in a manner that would justify an additional performance adjustment. And most importantly, they have not shown how these metrics produce benefits to customers. In most areas its performance aligns with the average of other Pennsylvania natural gas distribution companies, and, in some important areas, its performance is below the norm. The Company should focus on increasing the completion rates of meter readings, reducing busy-out occurrences, and decreasing the total number of customer complaints. I recommend requiring the company to perform regular, thorough root cause analyses of complaint trends, covering both internal disputes and BCS informal complaints, to identify and document infractions and confirmed violations.
- NFGD currently charges a fee of up to $2.95 to customers who make payments with credit cards, debit cards, Apple Pay, Google Pay, PayPal and Venmo, as well as use

of their Interactive Voice Response (IVR) payment system. Eliminating these fees would support broader access to payment methods and reduce barriers for customers wanting to keep their accounts current. The reasonable cost of processing payments, regardless of the method, should be incorporated into NFGD's overall revenue requirement rather than charged directly to customers. This charge is especially important for low-income customers, and customers needing to avoid termination of service.

- NFGD does not maintain or analyze data regarding the effectiveness of its payment plans in preventing service termination. Such data is material to assess and structure payment plans in a manner that minimizes the risk of service termination. I recommend that NFGD establish a formal tracking process for all payment plans to assess the percentage of customers who enroll in a plan and subsequently avoid termination.

II. NFGD'S CUSTOMER SERVICE PERFORMANCE DOES NOT JUSTIFY A REWARD.

Q. PLEASE SUMMARIZE THE CUSTOMER SERVICE PERFORMANCE METRICS MONITORED BY THE COMMISSION AND NFGD'S RESULTS.

A. The Commission publishes annual reports on customer service performance for call centers, meter reading, billing timeliness, customer satisfaction survey responses, outages, and complaints. These reports compare the performance of Pennsylvania's largest natural gas distribution companies. My presentation of NFGD's performance reflects the 2024

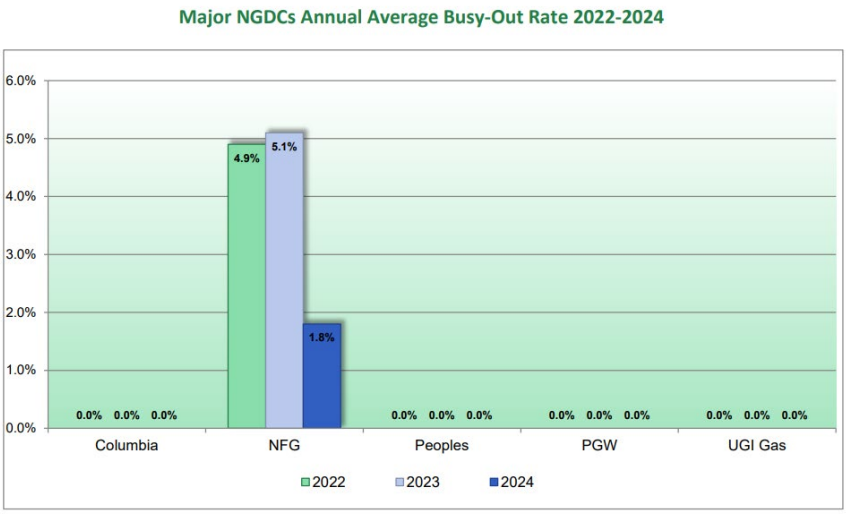
Customer Service Performance Report issued December 2025[5] and the UCARE[6] reports issued quarterly that include information on complaint volume, payment arrangements, and results of Bureau of Consumer Services (BCS) conclusions on informal customer complaints referred to that Commission bureau. I reviewed the 2024 report and the three available quarters for 2025.[7] My findings also reflect NFGD's responses to OCA data requests in this proceeding.

Q. OVERALL, HOW DOES NFGD COMPARE WITH OTHER PENNSYLVANIA NATURAL GAS DISTRIBUTION COMPANIES?

A. Overall, NFGD's performance is generally in line with the average of other Pennsylvania natural gas distribution companies. However, there are certain areas where NFGD's performance is only at the average level or falls below it.

Although NFGD's call center performance has improved in 2024, the Commission's 2024 Customer Service Performance Report documents NFGD's poor performance with a busy out rate of 4.9% in 2022, 5.1% in 2023, 1.8% in 2024 and a 1.2% busy out rate in 2025 compared to a 0% busy out rate of other gas distribution companies for each of the three years referenced.

[5] Available at: https://www.puc.pa.gov/media/3762/2024-customer-service-performance-report-final
[6] Available at: https://www.puc.pa.gov/media/3636/ucare_2024-q1-4.pdf
[7] Available at: https://www.puc.pa.gov/filing-resources/reports/consumer-activities-report-evaluation/



This result means that this percentage of NFGD customers could not even get into the queue to speak to a customer representative. While I acknowledge NFGD's improved performance, it still operates significantly below its peer gas utility companies, and therefore its results do not rise to the level of exceptional performance necessary to justify a management adder.

- The call abandonment rate decreased from 2.8% in 2023 to 0.8% in 2024. However, it increased to 1.8% in 2025, aligning with the same trend observed among most other gas distribution companies.
- Regarding calls that reached the Company, 91% were answered within 30 seconds in 2024. This 91% result is consistent with the performance of most other gas distribution companies that year.
- With regards to issuing timely bills and ease of reaching the company, NFGD's performance in 2024 aligns with the industry's average of 54% and 85% respectively.[8]

[8] Available at: https://www.puc.pa.gov/media/3762/2024-customer-service-performance-report-final.pdf, p. 16.

Annual Average Number and Percent of NGDC Residential Bills Not Rendered Once Every Billing Period

Company	2022		2023		2024	
	Number	Percent	Number	Percent	Number	Percent
Columbia	0	0.00%	0	0.00%	0	0.00%
NFG	0	0.00%	0	0.00%	0	0.00%
Peoples	0	0.00%	0	0.00%	17,427	3.10%
PGW	0	0.00%	0	0.00%	3	0.00%
UGI Gas	3	0.00%	1	0.00%	1	0.00%
Industry Average	**1**	**0.00%**	**0**	**0.00%**	**2,905**	**0.52%**

NGDC Survey Results – Ease of Reaching the Company – 2022-2024

Company	Satisfaction with Ease of Reaching the Company		
	2022	2023	2024
Columbia	85%	81%	86%
NFG	87%	86%	85%
Peoples	84%	84%	86%
PGW	74%	84%	82%
UGI Gas	82%	80%	86%
Industry Average	**82%**	**83%**	**85%**

- With regards to customer service representatives' knowledge and courtesy, NFGD's performance is just slightly under the 2024 industry's average of 91%.[9]

NGDC Survey Results – Consumer Ratings of Representatives – 2022-2024

Company	Call Center Representative's Courtesy			Call Center Representative's Knowledge		
	2022	2023	2024	2022	2023	2024
Columbia	99%	95%	94%	94%	92%	92%
NFG	96%	95%	93%	91%	90%	90%
Peoples	97%	94%	94%	93%	91%	92%
PGW	95%	95%	93%	92%	92%	92%
UGI Gas	94%	95%	95%	90%	91%	91%
Industry Average	**95%**	**95%**	**94%**	**92%**	**91%**	**91%**

[9] Available at: https://www.puc.pa.gov/media/3762/2024-customer-service-performance-report-final.pdf-p. 23.

- With regards to customer satisfaction surveys, in 2022 NFGD's averaged 88.6%, in 2023, 88.4%, with 2024 showing a decline to 87.6%.[10]
- NFGD has seen year-over-year increases in service outages over the last three years with 379 outages in 2022, 465 outages in 2023, and 478 outages in 2024.[11] This trend shows an increase in service outages over time.
- With regards to meter reading, NFGD's meter reading performance is below average. In 2024, NFGD's percentage of residential meters not read by the company or the customer within six months was the highest of its peers in 2022, 2023 and 2024.[12] All other gas utilities averaged very close to zero percentage of unread meters, while NFGD's percentage averaged slightly above one percent.[13] This performance in 2025 has remained relatively flat compared to prior year's performance.[14] The same trend and result is applicable to the number and percentage of residential meters not read in 12 months.[15]

[10] Attachment OCA III-01.
[11] Attachment OCA III-01.
[12] Available at: https://www.puc.pa.gov/media/3762/2024-customer-service-performance-report-final.pdf-pg. p. 12.
[13] Available at :https://www.puc.pa.gov/media/3762/2024-customer-service-performance-report-final.pdf-pg. p. 12.
[14] Attachment OCA III-01.
[15] Available at: https://www.puc.pa.gov/media/3762/2024-customer-service-performance-report-final.pdf-pg.p. 12.

Annual Average Number and Percent of NGDC Residential Meters Not Read by Company or Customer in Six Months

Company	2022		2023		2024	
	Number	Percent	Number	Percent	Number	Percent
Columbia	11	0.00%	10	0.00%	6	0.00%
NFG	1,315	1.09%	1,192	1.03%	1,037	0.93%
PECO (Gas)	11	0.00%	18	0.00%	53	0.01%
Peoples	6	0.00%	8	0.00%	4	0.00%
PGW	162	0.03%	134	0.03%	208	0.04%
UGI Gas	58	0.01%	49	0.01%	36	0.01%
Industry Average	**261**	**0.19%**	**235**	**0.18%**	**224**	**0.16%**

Annual Average Number and Percent of NGDC Residential Meters Not Read in 12 Months

Company	2022		2023		2024	
	Number	Percent	Number	Percent	Number	Percent
Columbia	2	0.00%	2	0.00%	1	0.00%
NFG	2,094	1.72%	724	0.62%	200	0.18%
PECO (Gas)	1	0.00%	2	0.00%	6	0.00%
Peoples	11	0.00%	6	0.00%	4	0.00%
PGW	40	0.01%	38	0.01%	71	0.02%
UGI Gas	30	0.01%	16	0.00%	8	0.00%
Industry Average	**363**	**0.29%**	**131**	**0.11%**	**48**	**0.03%**

- With regards to customer complaints informally appealed to the BCS and presented in the 2024 and 2025 UCARE filings, NFGD's performance shows a significant increase in the volume of payment arrangement disputes, from 311 in 2024, to 262 in the first three quarters of 2025. Based on the 262 complaints from the first three quarters of 2025, the average of 26 complaints per month projects a year-end total of approximately 340 complaints, continuing the upward trajectory. While these types of disputes increased for Columbia Gas and Peoples Gas, their percentage increase was lower than that of NFGD's. NFGD's performance is typical and not a reflection of any particularly exceptional level of performance.

- NFGD's 2024 customer satisfaction results for field representatives regarding overall satisfaction with the way the premises visit was handled has significantly decreased over the past three years, ranking well below other natural gas providers. NFGD's three-year average is 89%. In contrast, the combined average of the other gas utilities was 92%.[16]

NGDC Survey Results – Premises Visit from a Field Representative – 2022-2024

Company	Field Rep's Courtesy			Field Rep's Knowledge			Field Rep's Respect for Property		
	2022	2023	2024	2022	2023	2024	2022	2023	2024
Columbia	92%	96%	97%	92%	95%	92%	87%	96%	98%
NFG	90%	98%	95%	83%	96%	92%	95%	88%	85%
Peoples	100%	95%	98%	97%	93%	96%	94%	93%	91%
PGW	96%	97%	97%	98%	98%	96%	93%	94%	97%
UGI Gas	98%	98%	98%	91%	93%	92%	86%	90%	97%
Industry Average	**96%**	**97%**	**97%**	**93%**	**95%**	**94%**	**91%**	**91%**	**92%**

- NFGD's response time to residential customers' complaints is also above the industry average for 2021, 2022, and 2023.[17]

[16] Available at: https://www.puc.pa.gov/media/3762/2024-customer-service-performance-report-p. 27.
[17] Available at : https://www.puc.pa.gov/media/3062/2023-customer-service-performance-report-pg. p. 44.

2021-23 Average Response Time to BCS
Residential Consumer Complaints
Major Natural Gas Distribution Companies

Utility	Number of Days		
	2021	2022	2023
Columbia	10.3	8.2	6.2
NFG	13.6	16.9	16.7
Peoples	4.8	4.6	5.3
PGW	21.2	19.8	18.4
UGI Gas	7.6	10.7	15.4
Industry Average	**13.0**	**14.2**	**14.7**

The Company's customer service metrics, overall, are in line with industry standards. Although some indicators reflect performance slightly above peer levels, others demonstrate results that are comparatively below those benchmarks. Therefore, performance that is average does not justify the Commission's approval of a performance management adder.

Q. HAS NFGD COMPLETED AN ANALYSIS OF ITS PAYMENT PLANS IN TERMS OF THEIR SUCCESS OR OUTCOME?

A. No.[18] NFGD does not collect data on whether a termination notice is avoided when a customer makes a payment or enters a payment plan.[19] This information is important for determining the effectiveness of any company response to customers who indicate that they are unable to pay their current bill. Without such data, it is difficult to evaluate whether existing customer assistance or payment arrangement options are successfully preventing service termination. I recommend that NFGD be required to conduct such an analysis as a condition of any rate increase ordered in this proceeding. The company

[18] NFGD Response to OCA-Set 3-14.
[19] NFGD Response to OCA-Set 12-2.

should evaluate the extent to which payments or payment arrangements prevent terminations after a notice has been issued and report this information to the parties within six months. This analysis would provide useful insight into how well current policies support customers experiencing payment difficulties and help inform any future policy or program adjustments.

III. CONCLUSION AND RECOMMENDATION REGARDING PROPOSED CUSTOMER SERVICE PERFORMANCE INCENTIVE

Q. BASED ON YOUR REVIEW OF HOW NFGD HAS JUSTIFIED ITS PROPOSED REWARD TO INCREASE ITS EARNINGS FROM PENNSYLVANIA CUSTOMERS BASED ON ITS CUSTOMER SERVICE PERFORMANCE, WHAT IS YOUR CONCLUSION AND RECOMMENDATION.

A. The Company's operational performance does not support a reward for exceptional or excellent customer service. Specifically, performance in call center operations, meter reading timelines, and service outage increases do not demonstrate results that exceed reasonable expectations. In other operational areas, NFGD's performance is generally consistent with the industry average among natural gas distribution companies. Based on this record, there is no basis to increase the return on common equity for management performance.

Q. DO YOU HAVE ANY ADDITIONAL COMMENT REGARDING NFGD'S REQUEST FOR A PERFORMANCE ADJUSTMENT?

A. Yes. The Company has not demonstrated sufficient performance to justify a 25-point performance management adjustment. Performance adjustments are intended to recognize superior performance that provides incremental customer benefits. The data provided does not support superior levels. The Company's call center performance for the most part is in line with other natural gas providers in PA. However, their performance on meter reading is subpar.

In summary, the Company has not shown that it has achieved results that distinguish it from their peers to warrant a performance management adjustment.

IV. NFGD'S PAYMENT FEES SHOULD BE ELIMINATED

Q. PLEASE DISCUSS NFGD'S BILL PAYMENT OPTIONS FOR RESIDENTIAL CUSTOMERS.

A. NFGD offers multiple ways to pay the customer bill. However, other than payment by mailing a check or automated bill payment from the customer's checking account, these methods require the customer to pay a fee that is added on to the bill amount:

- *Online – AutoPay, One-Time Pay, or Pay by Text (www.nationalfuel.com)*
- *IVR Self-Service by Phone (1-855-437-1168)*
- *By Mail (National Fuel Gas, PO Box 371835, Pittsburgh, PA 15250-7835)*
- *In Person (drop boxes at 1100 State St, Erie PA and 1 Relief St, Oil City PA)*

- *Authorized Payment Center*
  - *o Money Gram*
  - *o Western Union*[20]

This policy operates to increase the customers' bill for electronic payment, even though electronic payment is encouraged by NFGD and is the more popular way to pay routine utility bills. Exhibit LMW-3 shows these additional fees resulted in customer payments of $815,559 in 2024 and $930,384 in 2025 for the commonly accepted method of paying by credit or with debit card or using the call center to make a payment. These fees particularly have a discriminatory impact on fixed and lower income customers who often need to make a last-minute payment to avoid termination of service. In 2025, 233,756 online payments were made totaling $692,014[21] supporting my concern about the adverse impact on vulnerable customers.

Q. WHAT DO YOU RECOMMEND WITH REGARD TO THESE PAYMENT FEES CHARGED BY NFGD?

A. I recommend that NFGD transition to a fee-free payment system allowing customers to use a broad range of payment options without incurring a fee. Other gas utilities such as UGI and Peoples Gas allow one-time credit or debit card payments online or by phone with no fee.[22] I understand that NFGD may have contracts with third parties to process

[20] NFGD Attachment OCA III-3.
[21] Response to OCA-7-4. Attachment OCA VII-04.
[22] Available at: https://www.ugi.com/payments-billing

these electronic payments. However, a more reasonable approach is to require NFGD to investigate lower cost payment processing options. Reasonable and practical payment processing costs, similar to how the handling cost for checks sent through the postal service are treated, should be included in the overall revenue requirement. It is also likely that eliminating payment fees will encourage more customers to adopt online payment methods. Increased use of electronic payments may improve the Company's cash flow because these payments are credited to customer accounts more quickly and require less processing than mailed checks handled by NFGD or its agent.

Q. DOES THIS CONCLUDE YOUR TESTIMONY AT THIS TIME?

A. Yes. However, I reserve the right to supplement my testimony upon receipt of late-filed discovery.

Qualifications of

LeeAnn Wise

Education:

2008 Master's of Business Administration, Shippensburg University

1989 B.S. Professional Accountancy, Pennsylvania State University

Relevant Positions:

March 2025 Regulatory Analyst, Pennsylvania Office of Consumer Advocate

Role Description:

I am currently employed by the Pennsylvania Office of Attorney General, Office of Consumer Advocate (OCA) as a Senior Regulatory Analyst. In this position, my responsibilities include reviewing utility company filings with the Pennsylvania Public Utility Commission (Commission) and analyzing the financial, economic, rate of return, and policy issues that are relevant to the filings. Additionally, I am tasked with preparing recommendations for the OCA's involvement in utility filings with the PA PUC, writing testimony and presenting oral testimony on behalf of the OCA. As part of my role, I also assist in the policy matters regarding low-income issues and customer service subjects.

Relevant Training: I have over fifteen years of experience overseeing and evaluating customer service operations of utility-affiliated and third-party call centers. This includes time at Comcast as Senior Finance Manager, where I provided oversight of performance metrics, evaluating disputes and time to resolve, call-handle times, average speed of answer, and ensuring customer interactions align to policy standards. My training includes a sound understanding of the best practices in customer service delivery, call tracking protocols, and the importance of consistent documentation to support customer communication and reliability.

Provided Case Testimony: Wellsboro Electric, Docket No. R-2025-3054392

Citizens' Electric, Docket No. R-2025-3054394

Valley Energy, Docket No. R-2025-3054393

Wellsboro Electric, Docket No. R-2025-3054392
Citizens' Electric, Docket No. R-2025-3054394
Valley Energy, Docket No. R-2025-3054393
Pittsburgh Water, Docket No. R-2025-3055010, R-2025-3055011, R-2025-3055012
PA American Acquisition of CUPA A-2025-3055551
York Water Company Docket No. R-2025-3053442, R-2025-3053573
Conneaut Lake Park Water Docket No. P-2024-3051855, I-204-3051857
City of Lancaster-Water Department Docket No. R-2025-3057237
PPL Electric Utilities Corporation Docket No. R-2025-30557165
National Fuel Gas Docket No. Rr-2025-3059428

Payment Fees Paid by Customers

	Live Agent via phone	IVR payment via phone (Credit/Debit)	IVR payment via phone (ACH/EFT)	Online Payment (One time pay and Auto Pay) via credit/debit)	Online Payments via PayPal and Venmo	Monthly Total
	264	2,801	2,838	15,367	1,216	**21,270**
24-Jan	$1,042.80	$8,262.95	$2,838.00	$45,332.65	$3,587.20	**$61,063.60**
	308	3,412	3,053	17,200	1,407	**23,973**
24-Feb	$1,216.60	$10,065.40	$3,053.00	$50,740.00	$4,150.65	**$69,225.65**
	333	3,340	2,968	17,612	1,424	**24,253**
24-Mar	$1,315.35	$9,853.00	$2,968.00	$51,955.40	$4,200.80	**$70,292.55**
	422	3,964	3,191	16,828	1,348	**24,405**
24-Apr	$1,666.90	$11,693.80	$3,191.00	$49,642.60	$3,976.60	**$70,170.90**
	365	3,802	3,078	17,993	1,454	**25,238**
24-May	$1,441.75	$11,215.90	$3,078.00	$53,079.35	$4,289.30	**$73,104.30**
	262	3,290	2,878	16,109	1,275	**22,539**
24-Jun	$1,034.90	$9,705.50	$2,878.00	$47,521.55	$3,761.25	**$64,901.20**
	276	3,577	3,015	16,819	1,266	**23,687**
24-Jul	$1,090.20	$10,552.15	$3,015.00	$49,616.05	$3,734.70	**$68,008.10**
	313	3,811	2,964	17,485	1,344	**24,573**
24-Aug	$1,236.35	$11,242.45	$2,964.00	$51,580.75	$3,964.80	**$70,988.35**
	296	3,340	2,770	16,736	1,073	**23,142**
24-Sep	$1,169.20	$9,853.00	$2,770.00	$49,371.20	$3,165.35	**$66,328.75**
	349	3,953	2,999	18,237	928	**25,538**
24-Oct	$1,378.55	$11,661.35	$2,999.00	$53,799.15	$2,737.60	**$72,575.65**
	285	3,315	2,671	16,834	907	**23,105**
24-Nov	$1,125.75	$9,779.25	$2,671.00	$49,660.30	$2,675.65	**$65,911.95**
	262	2,876	2,794	16,083	1,095	**22,015**
24-Dec	$1,034.90	$8,484.20	$2,794.00	$47,444.85	$3,230.25	**$62,988.20**
	302	3,405	3,030	18,030	1,343	**24,767**
25-Jan	$1,192.90	$10,044.75	$3,030.00	$53,188.50	$3,961.85	**$71,418.00**
	317	3,790	3,158	18,724	1,157	**25,989**
25-Feb	$1,525.15	$11,180.50	$3,158.00	$55,235.80	$3,413.15	**$74,512.60**
	260	4,086	3,347	20,538	1,238	**28,231**
25-Mar	$1,027.00	$12,053.70	$3,347.00	$63,021.83	$1,217.37	**$80,666.90**
	450	4,641	3,348	18,953	1,165	**27,392**
25-Apr	$1,777.50	$13,690.95	$3,348.00	$55,911.35	$3,436.75	**$78,164.55**
	429	4,850	3,349	20,107	1,089	**28,735**
25-May	$1,694.55	$14,307.50	$3,349.00	$59,315.65	$3,212.55	**$81,879.25**
	358	4,206	3,004	18,680	1,159	**26,248**
25-Jun	$1,414.10	$12,407.70	$3,004.00	$55,106.00	$3,419.05	**$75,350.85**
	337	4,300	3,166	19,493	1,218	**27,296**
25-Jul	$1,331.15	$12,685.00	$3,166.00	$57,504.35	$3,593.10	**$78,279.60**
	296	4,353	3,030	19,647	1,213	**27,326**
25-Aug	$1,169.20	$12,841.35	$3,030.00	$57,958.65	$3,578.35	**$78,577.55**
	282	3,723	2,802	18,619	1,102	**25,426**
25-Sep	$1,113.90	$10,982.85	$2,802.00	$54,926.05	$3,250.90	**$73,075.70**
	306	4,676	3,166	21,285	1,243	**29,433**
25-Oct	$1,208.70	$13,794.20	$3,166.00	$62,790.75	$3,666.85	**$84,626.50**
	229	3,823	2,850	19,813	1,103	**26,715**
25-Nov	$904.55	$11,277.85	$2,850.00	$58,448.35	$3,253.85	**$76,734.60**
	261	3,695	3,079	19,867	1,180	**26,902**
25-Dec	$1,030.95	$10,900.25	$3,079.00	$58,607.65	$3,481.00	**$77,098.85**
	3,735	41,481	35,219	203,303	14,737	**298,475**
Total for 2024	$14,753.25	$122,368.95	$35,219.00	$599,743.85	$43,474.15	**$815,559.20**
	3,827	49,548	37,329	233,756	14,210	**338,670**
Total for 2025	$15,389.65	$146,166.60	$37,329.00	$692,014.93	$39,484.77	**$930,384.95**

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission

v. Docket No. R-2025-3059428

National Fuel Gas Distribution Corp.
:

VERIFICATION

I, LeeAnn Wise, hereby state that the facts above set forth in my Direct Testimony, OCA Statement 5, are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

DATED: April 16, 2026

Signature: */s/LeeAnn Wise*
LeeAnn Wise

Address: 555 Walnut Street,
5th Floor, Forum Place
Harrisburg, PA 17101-1923

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission		
	:	Docket No. R-2025-3059428
v.		
National Fuel Gas Distribution Corporation.		

SURREBUTTAL TESTIMONY

LeeAnn Wise

ON BEHALF OF

THE PENNSYLVNAIA

OFFICE OF CONSUMER ADVOCATE

May 27, 2026

I. INTRODUCTION AND QUALIFICATIONS

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.

A. My name is Lee Ann Wise. My business address is 555 Walnut Street, Forum Place, 5th Floor, Harrisburg, Pennsylvania 17101. I am currently employed as a Senior Regulatory Analyst by the Pennsylvania Office of Consumer Advocate (OCA).

II. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. The purpose of my surrebuttal testimony is to respond to the rebuttal testimony of NFG witness Mr. Jason Scouten regarding completion of meter readings and customer outages, NFG witness Mr. Matthew Stoops Jr. regarding call center performance, root cause analysis, and payment fees, and NFG witness Joshua C. Nowak regarding NFG's request for a management performance adder to NFG's Return on Equity.

Q. DID YOU PREVIOUSLY SUBMIT TESTIMONY IN THIS PROCEEDING ON BEHALF OF THE OCA?

A. Yes, my direct testimony, OCA Statement No. 5, was served on April 16, 2026.

III. METER READING

Q. DID THE COMPANY DISAGREE WITH YOUR ASSESSMENT ON METER READING COMPLETION?

A. Yes, NFG witness Scouten disagreed with my direct testimony regarding the timely completion of meter readings, including my recommendation that NFG focus on improving the timeliness of meter reading performance**.**

Q. WHY DID NFG WITNESS SCOUTEN DISAGREED?

A. NFG witness Scouten stated "comparing National Fuel's 'meter reading' performance to other utilities is not exactly a clean 'apples-to-apples' comparison because the Company has maintained a model that emphasizes in-person meter reads (in part to promote meter access and inspection)."[1]

Q. DO YOU HAVE ANY COMMENTS?

A. Other natural gas distribution companies also perform field inspections and safety-related activities while achieving stronger meter reading compliance metrics. NFG suggests that the timeliness of meter reading performance is a result of utilizing in-house meter reading staff who also conduct safety-related operations. However, the Company has not provided detailed support demonstrating that these activities caused or contributed to the lower completion rates.

[1] NFG Rebuttal Testimony Scouten pg. 5 ln. 4-7.

The concern is not whether in-person inspections provide safety benefits, but whether the Company is operating efficiently and using available best practices to reduce estimated bills and improve customer service.

The Company also cites expanded appointment availability and the relocation of approximately 20% of inside meters to outside locations since 2021 as evidence of improvement efforts.[2] While these actions are constructive, they also demonstrate that operational changes can improve meter accessibility and reading performance. Overall, these initiatives do not resolve concerns regarding the Company's current performance relative to peer utilities.

The Company presents safety and modernization as competing objectives. However, the Company does not demonstrate that improving meter reading practices would prevent continued in-person safety activities.

IV. OUTAGES

Q. **DID NFG WITNESS SCOUTEN AGREE WITH YOUR CONCERNS REGARDING OUTAGE INCREASES?**

A. No. NFG witness Scouten noted a slight increase in service outages over the past three years but stated that they are not always tied to operational deficiencies.[3]

Q. **DO YOU HAVE ANY COMMENTS?**

[2] NFG Rebuttal Testimony Stoops pg. 6, ln 2-3.
[3] NFG Rebuttal Testimony Stoops pg. 6, ln. 8-9.

A. Yes, according to the data provided by the Company, in 2023, NFG experienced 465 outages. In 2024, NFG experienced 478 outages, which is an increase of 2.80% in year over year outages. NFG witness Scouten does not provide data or analysis necessary to support the claimed .046% increase year-over-year outage percentage stated in his rebuttal testimony[4], making it unclear how this figure was calculated. While the percentage of the increase may seem small relatively, it is concerning that the number of outages increased. NFG witness Scouten attempts to downplay the number of outages by noting that a snow event occurred in NFG's service territory.[5] While an increase in severe weather events may contribute to more outages, attributing the rise in outages solely to weather—and characterizing the increase as only slight—does not address the underlying reliability concerns. For natural gas distribution companies, outages can pose serious, potentially life-threatening risks, making it unreasonable to minimize any increase in outage frequency.

While I acknowledge that the December 2024 lake-effect snow event in Erie County cited by the Company was severe[6]; utilities are generally expected to plan for and adapt to changing operating conditions, including more frequent or severe weather, through resiliency, preparedness, and operational improvements.

The Company attributes some outage increases to safety-driven operational practices during leak response and third-party line strikes, including shutting off valves rather than other repair methods. While safety is of the utmost importance, the record does not reflect the extent to which these practices have contributed to outage growth or whether

[4] NFG Rebuttal Testimony Scouten pg. 6, ln. 5-22.
[5] NFG Rebuttal Testimony Scouten pg. 6, ln. 8-15.
[6] NFG Rebuttal Testimony Stoops pg. 6, ln. 10-12.

alternative approaches, infrastructure investments, or enhanced damage prevention could reduce customer interruptions.

The Company also references improvements in damage prevention, but NFG witness Scouten does not provide sufficient data to evaluate trends in third-party damage or how performance compares to peer utilities. As a result, it is unclear whether observed outage levels are driven primarily by external factors or whether additional improvement opportunities exist.

External factors do not eliminate the need to maintain strong reliability performance and pursue continuous improvement in outage prevention and restoration while maintaining safe operations.

V. CALL CENTER METRICS

Q. DOES THE COMPANY AGREE WITH YOUR ASSESSMENT OF THEIR CALL CENTER METRICS?

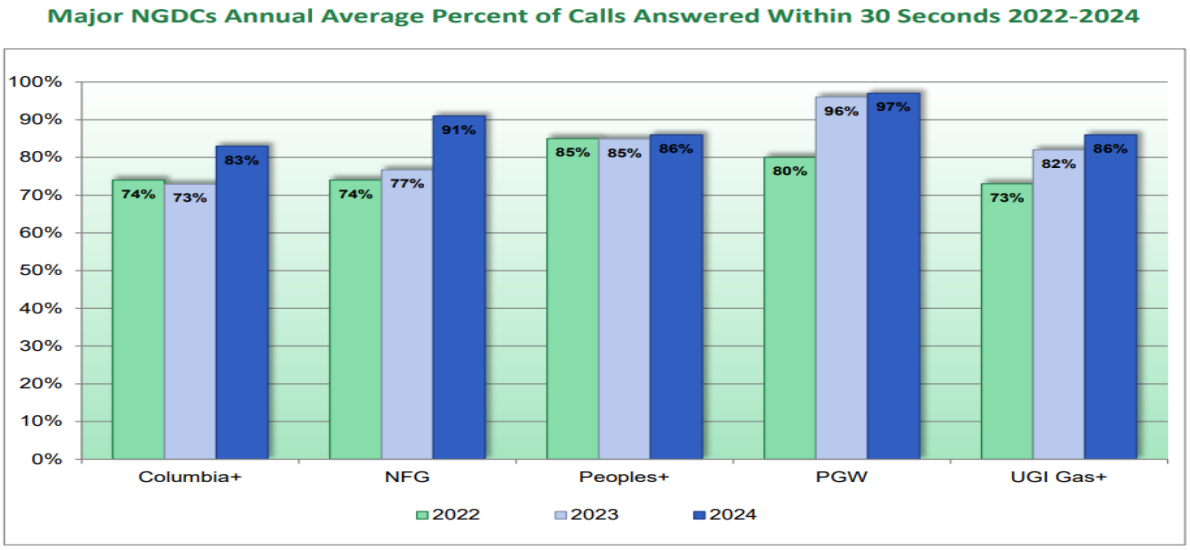
A. No, the Company does not agree with my assessment of call center metrics. These metrics were obtained from the 2024 Customer Service Performance Report issued December 2025 and the UCARE reports issued quarterly that include information on complaint volume, payment arrangements, and results of Bureau of Consumer Services (BCS) conclusions on informal customer complaints referred to that Commission bureau.

Q. WHY DOES THE COMPANY DISAGREE WITH YOUR ASSESSMENT OF CALL CENTER METRICS?

A. NFG witness Stoops noted the fact that no mention was given to the metrics in which the Company has strong performance. NFG witness Stoops stated, "the Company has made improvements in its average calls answered within 30 seconds from 74% in 2022, 77% in 2023, and 91% in 2024. The positive increase from 2022 to 2025 was the largest increase seen by the Company's peers all NGDCs saw increased performance in this area during the same period. Moreover, in 2025 the Company's average calls answered within 30 seconds was the second highest of the NGDCs."[7] Pointing to NFG's performance with certain metrics in an attempt to disregard poor performance in other metrics is unreasonable.

The Company highlights improvements in the percentage of calls answered within 30 seconds between 2022 and 2024, however, improvement alone does not establish that customer service performance is adequate or exemplary. The fact that performance increased from prior years merely shows that prior performance was lower. The chart below shows NFG's three-year performance versus other NGDCs:

[7] NFG Rebuttal Testimony Stoops, pg. 32, ln. 4-9.



As shown above, although the Company points to improvements in the percentage of calls answered within 30 seconds, the resulting performance appears generally comparable to that of peer NGDCs rather than demonstrably superiority.

NFG witness Stoops emphasized that NFG's annual call abandonment rates were comparatively low.[8] However, abandonment rate statistics do not fully capture customer frustration where callers receive busy signals, encounter repeated call attempts, or are otherwise unable to access customer service in a timely manner. These metrics should therefore be considered together rather than in isolation.

NFG witness Stoops also feels it is unfair to compare NFG to other gas utilities regarding busy out rates due to NFG not using an Interactive Voice Response (IVR) system.[9] This argument is unpersuasive for several reasons. Most importantly, the

[8] Rebuttal Testimony Stoops pg.32, ln.10-12.
[9] Rebuttal Testimony Stoops pg.32, ln.15-19.

Company's decision not to implement an IVR system is a management and operational choice. Customers should not bear the consequences of that decision through increased busy signals or reduced accessibility. If peer utilities have implemented technologies that reduce busy outs and improve customer access, those operational improvements are relevant and appropriate points of comparison. The purpose of benchmarking customer service metrics is to evaluate actual customer experience and operational effectiveness, regardless of the internal business decisions that produced the results.

NFG witness Stoops provides subjective claims that customers prefer speaking directly with live representatives but does not provide evidence demonstrating that customers prefer receiving busy signals or delayed access over the availability of modern call-routing and self-service options.[10] The implementation of an IVR system does not preclude the provision of direct access to live customer service representatives. The way calls are routed, including whether and when customers are connected to live representatives, is a matter of Company design and discretion.

The Company's argument suggests that the lack of an IVR system may be a contributing factor to higher busy-out rates. Instead of justifying the result, this points to a potential need for operational improvements to enhance customer access and call-handling capacity.

VI. ROOT CAUSE ANALYSIS

[10] Rebuttal Testimony Stoops pg.32, ln. 20-21.

Q. DOES THE COMPANY AREE WITH YOUR RECOMMENDATION ON ROOT CAUSE ANALYSIS ?

A. No. The Company does not agree with my recommendation to conduct a root cause analysis on complaints. Company NFG witness Stoops stated that the Company already conducts an analysis of all customer complaints, referred to as "Justified Complaints."[11]

Q. DO YOU HAVE ANY COMMENTS?

A. The Company's described process is reactive and case-specific, focusing on whether individual policies or procedures were followed in response to a complaint by either internal company personnel or third-party contractors. In contrast, a root cause analysis is a proactive, structured methodology designed to identify systemic issues that may not be apparent from individual complaint investigations. A structured root cause analysis, on internal and third-party complaints is needed to identify recurring issues at their source, rather than relying only on case-by-case complaint corrections.

VII. PAYMENT PLAN EFFECTIVENESS

Q. DOES THE COMPANY AGREE WITH YOUR RECOMMENDATION TO CONDUCT AN ANALYSIS OF WHETHER TERMINATION NOTICE IS AVOIDED WHEN A CUSTOMER MAKES A PAYMENT OR ENTERS A PAYMENT PLAN.

[11] NFG Rebuttal Testimony Stoops, pg. 33, ln. 11-12.

A. No. The Company disagrees with my recommendation that it be required to conduct an additional payment plan effectiveness analysis as a condition of any rate increases in this proceeding.

Q. WHY DOES THE COMPANY DISAGREE WITH YOUR RECOMMENDATION?

A. NFG witness Stoops states that the Company has developed and implemented comprehensive, formal training for its call center employees that is specifically designed to ensure customers experiencing financial hardship are fully informed of all available options. [12]

NFG witness Stoops also notes the Company's percentage of Total Dollars in Debt of customers on an arrangement rose from 38.6% in 2022, to 46.8% in 2024.[13]

Q. DO YOU HAVE ANY COMMENTS?

A. The Company's response does not establish that its current evaluation methods are adequate to assess whether payment arrangements and related assistance tools are effectively preventing service terminations.

The Company merely describes training for call center staff to inform customers of available assistance options, including payment arrangements, budget billing, extensions, and referrals. While important for program implementation, training alone does not demonstrate program effectiveness in reducing arrearages or preventing service

[12] Rebuttal Testimony Stoops pg.34, ln.15-19.
[13] Rebuttal Testimony Stoops pg.35, ln. 6-7.

disconnections. Program effectiveness must be supported by outcome-based evidence showing that the intended customer benefits have been achieved.

The Company cites an increase in arrearage dollars associated with customers associated with payment arrangements as evidence of effectiveness.[14] This reflects participation but does not measure outcomes such as reduced terminations, successful completion of arrangements, or sustained payment performance. Accordingly, it is insufficient to evaluate program effectiveness.

The Company acknowledges that it does not track termination avoidance in the manner contemplated by my recommendation. [15]

Preventing disconnections is essential to maintaining safe and reliable service. If payment arrangements are not actually reducing terminations, then the program is not fulfilling its fundamental purpose of maintaining continuous service while customers resolve arrears.

A payment arrangement is intended to function as a bridge that allows customers to keep essential utility service while paying down past-due balances over time. Without tracking whether those arrangements are successful in avoiding shutoffs, there is no way to determine whether customers—particularly vulnerable ones—are still being disconnected despite participating in assistance programs. In that circumstance, the program risks becoming a procedural offering rather than an effective safeguard.

For the Company, this type of metric is also critical because it provides direct, actionable insight into program performance. Elevated termination rates among

[14] NFG Rebuttal Testimony Stoops, pg. 35, ln. 6-7.
[15] Rebuttal Testimony Stoops pg.35, ln.16-19.

customers on payment arrangements can indicate underlying problems such as unaffordable repayment terms, gaps in customer outreach or enrollment, misalignment between arrearage levels and structured payment plans, or weaknesses in plan administration. Without this type of measurement, those issues may go undetected until they surface through complaints or increased bad debt. The result is that the Company is responding in a reactive manner to outcomes rather than identifying and correcting root causes.

Requiring this tracking helps close an important accountability gap. The Commission is not only concerned with whether programs exist, but whether they are effective in the real-world. Payment arrangements are frequently relied upon as a primary alternative to disconnection; if they do not actually prevent termination, then the underlying assumption supporting their use is not being met. Measuring termination avoidance allows the Commission to evaluate real-world effectiveness rather than relying on assumptions about program performance.

VII. PAYMENT FEES

Q. DOES THE COMPANY OPPOSE YOUR RECOMMENDATION TO TRANSITION TO A FEE-FREE ELECTRONIC PAYMENT POSITION?

A. Yes, the Company opposes my recommendation to move to a fee-free payment position.

Q. WHY DOES THE COMPANY OPPOSE MOVING TO A FEE-FREE PAYMENT POSITION?

A. NFG witness Stoops notes that customers currently have multiple payment options that do not incur a payment fee. Only payment options (Online, By Phone, or Authorized Payment Center) that involve a third party are fees charged and they are charged by the third-party company.[16]

Q. DO YOU HAVE ANY COMMENTS?

A. Although the Company has two payment fee-free payment options, (In-person or Auto-Pay ACH) the Company does not address the underlying customer affordability and accessibility concerns. The existence of alternative payment methods does not eliminate the burden imposed on customers who must use more immediate payment channels, particularly customers facing financial hardship or risk of service termination. Customers with limited banking access, transportation barriers, irregular work schedules, or urgent payment needs may not always be able to utilize the Company's preferred fee-free methods. As a result, payment processing fees can operate as an additional financial burden on customers who are already struggling to maintain service. The Company does not dispute that customers have collectively incurred substantial payment processing fees, nor does it argue that eliminating such fees could increase adoption of electronic payment methods. Increased electronic payment usage may also yield operational benefits, including reduced billing costs, improved payment timeliness, and lower collection-related expenses.

[16] NFG Direct Testimony Stoops, pg. 37, ln 5-7.

Finally, the Company's acknowledgment that eliminating fees could increase electronic payment participation further supports evaluation of a fee-free payment structure, particularly where such changes may enhance both customer experience and operational efficiency.

For these reasons, the recommendation to evaluate payment processing fees remains reasonable and appropriate.

VIII. PERFORMANCE ADDER

Q. DOES THE COMPANY DISAGREE WITH YOUR POSITION ON A MANAGEMENT EFFICIENCY ADDER?

A. Yes, company NFG witness Novak states, "I disagree with the Intervenor Witnesses' categorization of the Company's request and support the Company's request based on its demonstration of performance in the key areas discussed in NFG Witness Rebecca E. Hillery's Direct Testimony. While the Company continues to support the applicability of a management efficiency adder, NFGDC recognizes the importance of customer affordability amid ongoing inflationary pressures and has therefore chosen to forgo the request for an adder in the instant proceeding."[17]

Q. DO YOU HAVE ANY COMMENTS?

[17] NFG Rebuttal Testimony Nowak pg. 22, ln. 9-16.

A. Yes. My direct testimony demonstrated that NFG's performance is generally consistent with, and in certain metrics below, that of comparable peer gas utilities operating within Pennsylvania. NFG's overall performance reflects the level reasonably expected of a public utility and, therefore, does not justify the approval of a performance-based adder or a high return on equity.

I support the Company's decision to withdraw its request for an additional 25-basis-point performance adder but note that NFG's requested ROE remains unreasonably high.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, however, I reserve the right to file such additional testimony as may be necessary or appropriate.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	**:**	
	:	**Docket No. R-2025-3059428**
v.	**:**	
	:	
National Fuel Gas Distribution Corporation	**:**	
	:	

OFFICE OF SMALL BUSINESS ADVOCATE'S
LIST OF ADMITTED TESTIMONY AND EXHIBITS
OSBA EXHIBIT NO. 1

The Office of Small Business Advocate ("OSBA") admitted the following list of testimony and exhibits, as OSBA Exhibit No. 1, as evidence into the evidentiary record, at the Evidentiary Hearing on June 2, 2026, in the above-captioned proceeding:

- Direct Testimony and Exhibits of Justin B. Farr, labelled OSBA Statement No. 1, with associated Exhibit JBF-1, Exhibit JBF-2, Exhibit JBF-3, Exhibit JBF-4, Exhibit JBF-5, Exhibit JBF-6, Exhibit JBF-7, and Exhibit JBF-8, with signed Verification of Justin B. Farr.

- Rebuttal Testimony of Justin B. Farr, labelled OSBA Statement No.1-R, with signed Verification of Justin B. Farr.

Date: June 3, 2026

OSBA EXHIBIT NO. 1

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	**:**	
	:	**Docket No. R-2025-3059428**
v.	**:**	
	:	
National Fuel Gas Distribution Corporation	**:**	
	:	

OFFICE OF SMALL BUSINESS ADVOCATE'S
ADMITTED TESTIMONY AND EXHIBITS
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Date: June 3, 2026

COMMONWEALTH OF PENNSYLVANIA

April 16, 2026

The Honorable Katrina L. Dunderdale
Administrative Law Judge
Pennsylvania Public Utility Commission
Piatt Place
301 Fifth Avenue, Suite 220
Pittsburgh, PA 15222

Re: Pennsylvania Public Utility Commission v. National Fuel Gas Distribution Corporation / Docket No. R-2025-3059428

Dear Judge Dunderdale:

Enclosed please find the Direct Testimony and Exhibits of Justin B. Farr, labelled OSBA Statement No. 1, with associated Exhibit JBF-1, Exhibit JBF-2, Exhibit JBF-3, Exhibit JBF-4, Exhibit JBF-5, Exhibit JBF-6, Exhibit JBF-7, and Exhibit JBF-8, on behalf of the Office of Small Business Advocate ("OSBA"), in the above-referenced proceeding.

As evidenced by the enclosed Certificate of Service, all known parties will be served, as indicated.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

Enclosures
cc: PA PUC Secretary Matthew L. Homsher (Cover Letter & Certificate of Service only)
Justin B. Farr
Parties of Record

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	**:**	
	:	**Docket No. R-2025-3059428**
v.	**:**	
	:	
National Fuel Gas Distribution Corporation	**:**	
	:	

DIRECT TESTIMONY & EXHIBITS

of

JUSTIN B. FARR

on behalf

of

Pennsylvania Office of Small Business Advocate

Topics:

Revenue Requirement Adjustments
Cost of Service
Revenue Allocation
Energy Efficiency

Date Served: April 16, 2026

Date Submitted for the Record: _____

DIRECT TESTIMONY OF JUSTIN B. FARR

Section I - Introduction

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Justin B. Farr. My business address is 111 East Broadway, Suite 1200, Salt Lake City, Utah, 84111.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am a Director in the firm of Energy Strategies, LLC. Energy Strategies is a private consulting firm specializing in economic and policy analysis applicable to energy production, transportation, and consumption.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?

A. My testimony is being sponsored by the Pennsylvania Office of Small Business Advocate ("OSBA").

Q. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE AND QUALIFICATIONS.

A. My academic background includes a B.S. in economics and an M.B.A. from the University of Utah. While I was pursuing my M.B.A., I also worked in the Utah Governor's Office as an economist focused on revenue forecasting and tax policy. I joined Energy Strategies in 2005, where I assist private and public sector clients in the areas of energy-related economic and policy analysis, including evaluation of electric and gas utility rate matters.

From 2013 to 2017 and again from 2020 to early 2022, I worked at PacifiCorp, a six-state electric utility that operates in Utah, Wyoming, Idaho,

Oregon, Washington, and California. My roles at PacifiCorp included Manager of Economic & Financial Analysis where I led teams of engineers and plant managers in developing economic solutions for optimizing existing thermal and renewable infrastructure investment, and Assistant Manager of Regulation where I focused on the company's internal 10-year plan. Between 2017 and 2019, I served as Vice President of Financial Planning at Magnum Development where I supported the commercial development of the company's underground salt dome assets. My qualifications are attached in the Appendix to this testimony.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?

A. Yes. I have testified in the following proceedings: the Second DER Management Plan filed by PPL Electric Utilities Corp, Docket No. P-2024-3049223; Wellsboro Electric Company's 2025 Rate Case, Docket No. R-2025-3054392, Valley Energy Inc's 2025 Rate Case, Docket No. R-2025-3054393; Citizens' Electric Company of Lewisburg's 2025 rate case, Docket No. R-2025-305394; PECO Energy Company's Phase V EE&C Plan, Docket No. M-2025-3057328; and Duquesne Light Company's Phase V EE&C Plan, Docket No. M 2025-3057325.

Q. HAVE YOU TESTIFIED BEFORE UTILITY REGULATORY COMMISSIONS IN OTHER STATES?

A. Yes. I have provided testimony before the Utah Public Service Commission and the Indiana Utility Regulatory Commission.

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS PROCEEDING?

A. My testimony addresses the base rate revenue requirement proposed by National Fuel Gas Distribution Corporation Pennsylvania Division ("National Fuel" or the "Company"), as well as issues pertaining to class cost allocation, revenue allocation, and energy efficiency. The absence of comment on my part regarding a particular issue or revenue requirement item does not signify support for (or opposition to) the Company's filing with respect to that issue.

Q. ARE YOU MAKING A RECOMMENDATION FOR A SPECIFIC TOTAL REVENUE REQUIREMENT IN THIS CASE?

A. No. My revenue requirement adjustment recommendations address a limited number of issues. Therefore, I am not offering a recommendation for a specific total revenue requirement.

Q. PLEASE SUMMARIZE YOUR PRIMARY RECOMMENDATIONS AND CONCLUSIONS.

A. I offer the following recommendations and conclusions:

(1) I recommend adjusting National Fuel's salaries and wages to reflect staffing levels for the most recent 12-month period for which information is available (February 2025 – January 2026), rather than the projected increase proposed by the Company. This adjustment results in a revenue requirement reduction of approximately $525,364 relative to the Company's filed case.

(2) I recommend disallowing the portion of National Fuel's stock-based compensation that is tied to financial performance. This adjustment results in a revenue requirement reduction of approximately $1,517,718 relative to the Company's filed case.

(3) I recommend that the Commission deny National Fuel's request for a 25-basis point Management Premium that has been proposed as an adder to the Company's requested base Return on Equity ("ROE"). This adjustment results in a revenue requirement reduction of approximately $1,191,103 relative to the Company's filed case.

(4) I present a "proxy" ROE to supplement traditional cost-of-capital analysis. Use of this proxy ROE results in a revenue requirement reduction of approximately $5,560,798 relative to the Company's filed case.

(5) The methods used by the Company to allocate costs among classes are reasonably aligned with cost causation and at this time I am not recommending any changes to the cost allocation methods proposed by National Fuel in this case.

(6) I conclude that the Company's class revenue allocation proposal reasonably balances moving class revenue recovery in the direction of cost causation, while adhering to the principle of gradualism. In my opinion, National Fuel's proposed revenue allocation falls within the range of reasonableness.

(7) I recommend that National Fuel include in its proposal an energy efficiency program for non-residential customers.

If adopted, my recommendations will result in reducing the revenue requirement by $8.8 million compared to the $19.7 million increase proposed by National Fuel. My recommended adjustments are outlined in Table JBF-1 presented later in my testimony. My recommended reduction in revenue requirement does not account for or incorporate any other adjustments advanced by other parties that are not specifically addressed in my testimony.

Section II - Revenue Requirement Adjustments

Q. BRIEFLY DESCRIBE THE REVENUE REQUIREMENT INCREASE BEING REQUESTED BY NATIONAL FUEL IN THIS CASE.

A. National Fuel is requesting a $19,680,503 increase in annual distribution revenue, representing a 14.0% increase over present delivery rates, or 7.4% on a total revenue basis. The requested increase is based on a Fully Projected Future Test Year ("FPFTY") ending October 31, 2027.[1] The requested increase is designed to produce an overall rate of return of 8.78% on National Fuel's rate base.[2]

Q. DO YOU HAVE ANY RECOMMENDED ADJUSTMENTS TO NATIONAL FUEL'S PROPOSED REVENUE REQUIREMENT?

A. Yes. My recommended adjustments would reduce National Fuel's proposed revenue requirement increase by approximately $8.8 million. As discussed in greater detail later in my testimony, this reduction incorporates a proxy return on equity ("ROE") of 9.75%, which is derived from the median ROE authorized in recent rate cases for natural gas distribution companies of similar risk. Table JBF-1 presents a summary of my recommended adjustments and are attached as Exhibit JBF-1 to this testimony.

[1] National Fuel Statement No. 1, Direct Testimony of Rebecca E. Hillery, page 5-6.
[2] National Fuel Statement No. 10, Direct Testimony of Joshua C. Nowak, page 55.

Table JBF-1
Summary of OSBA Adjustments to National Fuel's Revenue Requirement

Adjustment Description	Adjustment Amount ($000s)	Increase Amount ($000s)
National Fuel Requested Non-Fuel Revenue Increase		$19,680
Expense Adjustments		
Employee Count	($525)	$19,155
Stock-based Compensation	($1,518)	$17,637
Capital Structure		
Management Premium	($1,191)	$16,446
Proxy Return on Equity	($5,561)	$10,885
Total Adjustments	($8,795)	
Adjusted Revenue Requirement Increase		$10,885

I provide details for each of these recommended adjustments in the following sections.

Employee Count

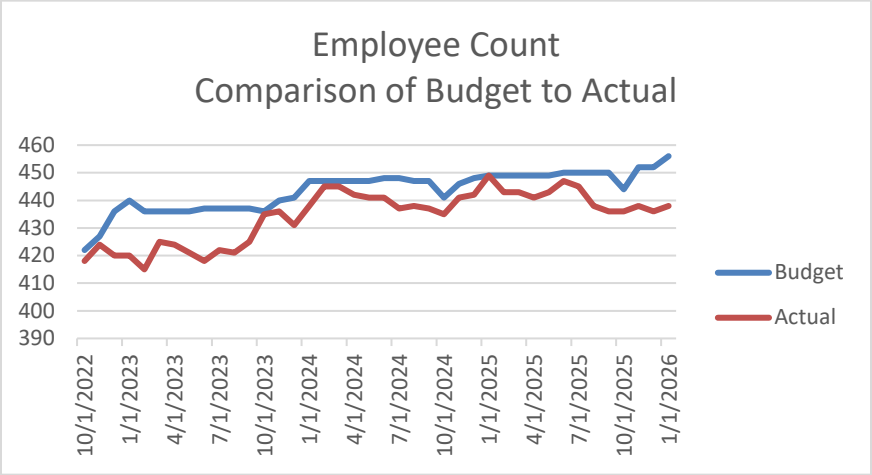
Q. PLEASE DESCRIBE NATIONAL FUEL'S ADJUSTMENT FOR EMPLOYEE COUNT.

A. Starting with the actual headcount of 436 employees as of 9/30/2025, the company added 17 budgeted employees for the Future Test Year ("FTY") and another six positions for the FPFTY, for a total of 450 and 459 employees,

respectively.[3] Recognizing that normal vacancies occur as a result of terminations and retirements, the company reduced the budgeted headcount by nine employees in both the FTY and FPFTY. As a result of this adjustment, the Company assumes 444 employees in FTY and 450 employees in FPFTY in its derivation of future Labor Expense.

Q. ARE YOU PROPOSING AN ADJUSTMENT TO NATIONAL FUEL'S LABOR EXPENSE?

A. Yes. I recommend adjusting National Fuel's salaries and wages to reflect the staffing level for this most recent 12-month period for which information is available. National Fuel has consistently reported actual employee counts below its budgeted staffing levels as shown in the following chart.



During the last 12 months for which data has been provided, National Fuel actually averaged 440.3 FTE's, which is approximately ten less FTE's than the Company is requesting to include in its revenue requirement.[4] This adjustment is shown in Exhibit JBF-2.

[3] Standard Data Request, Question No. RR-20, Respondent: Formato, page 1 of 1.
[4] Company response to I&E-RE-8-D&E and Exhibit ATF-4, Schedule 4 (Labor Savings), page 1.

Q. ARE YOU ADVOCATING THAT A PARTICULAR NUMBER OF EMPLOYEES IS APPROPRIATE FOR NATIONAL FUEL?

A. No, my adjustment is intended solely to reflect an accurate level of employment for ratemaking purposes. I am not recommending a specific staffing level, nor am I suggesting that the Commission should micro-manage the Company's operations. National Fuel remains responsible for managing its workforce to ensure efficient and safe operations. This adjustment simply maintains labor expense to be recovered through customer rates at a realistic level. Customers should not be required to pay rates based on an employee count that exceeds the Company's most recent actual experience.

Q. WHAT IS THE IMPACT OF THIS ADJUSTMENT?

A. As reported in Table JBF-1, this adjustment would reduce the revenue requirement by $525,364 in FPFTY 2027.

Stock-based Compensation

Q. PLEASE BRIEFLY EXPLAIN NATIONAL FUEL'S INCENTIVE-BASED COMPENSATION PROGRAM.

A. Effective October 1, 2022, National Fuel implemented an Annual Cash Bonus Program designed to incentivize salaried employees to achieve the Company's business objectives, while also supporting the attraction and retention of valuable talent. This incentive-based compensation is only paid if certain organizational goals based on customer service/satisfaction rates, operational safety measures, methane emissions reductions, employee safety and human capital/inclusion

initiatives are achieved during each fiscal year. In addition to the Annual Cash Bonus Program just described, National Fuel offers a stock-based compensation program, in the form of time-vested restricted stock.[5] With a small exception of stock shares issued for Environmental, Social, and Governance ("ESG") criteria, "all performance shares are based on financial results."[6]

Q. IN YOUR OPINION, IS IT APPROPRIATE TO RECOVER THE COST OF INCENTIVE-BASED COMPENSATION PROGRAMS IN UTILITY RATES?

A. It can be appropriate to recover the cost of incentive-based programs in utility rates to the extent that the compensation for such programs is not excessive and is tied to organizational goals such as customer service, operating efficiency, and safety, but is not appropriate for programs tied to financial performance. While rewarding employees for financial performance can be entirely appropriate, the responsibility for funding such awards rests most appropriately with shareholders, who are the primary beneficiaries of meeting or exceeding financial targets.

Q. WHAT IS YOUR RECOMMENDATION REGARDING RECOVERY OF ANNUAL STOCK-BASED COMPENSATION EXPENSES?

A. I recommend that expenses for stock-based compensation incentives be disallowed for ratemaking purposes because they are primarily tied to financial performance metrics that benefit shareholders, not the provision of safe and reliable utility services. My revenue requirement adjustment removes the FPFTY stock-based compensation expense, less the 5% portion of the stock-based

[5] National Fuel Statement No. 4, Direct Testimony of Valerie L. Hawthorn Wagner, pages 13-14.
[6] Company response to I&E-35-E.

compensation expense that the Company identified as being issued historically from December 2022 – December 2024 based on ESG criteria. This adjustment is shown in Exhibit JBF-3.

Q. WHAT IS THE IMPACT OF THIS ADJUSTMENT?

A. As reported in Table JBF-1, this adjustment would reduce the revenue requirement by $1,517,718 in FPFTY 2027.

Return on Equity Adjustments

Q. WHAT ROE IS NATIONAL FUEL REQUESTING IN THIS PROCEEDING?

A. National Fuel witness Joshua C. Nowak recommends an ROE of 11.25%. Mr. Nowak's recommended ROE is comprised of a base ROE of 11.00% and a 25-basis point premium for exceptional management performance and efficiency.[7]

Q. DO YOU SUPPORT NATIONAL FUEL'S REQUESTED ROE?

A. No. I do not support the proposed 25-basis point management premium or the 11.00% base ROE.

Q. PLEASE EXPLAIN YOUR OPPOSITION TO NATIONAL FUEL'S PROPOSED 25-BASIS POINT MANAGEMENT PREMIUM.

A. The Company's justification for the management premium relies on qualitative assertions regarding its performance across several areas, including safety, customer service, and operational efficiency. However, the Company does not establish:

[7] National Fuel Statement No. 10, Direct Testimony of Joshua C. Nowak, pages 3-4.

- Objective criteria for what constitutes "exceptional" management
- A benchmark for comparison to peers, or
- A quantifiable linkage between those attributes and a specific 25-basis point increment.

Without clearly defined and measurable standards, the proposed premium is inherently subjective and cannot be applied consistently across proceedings. This lack of rigor makes it unsuitable for inclusion in the determination of just and reasonable rates.

Q. DO THE PERFORMANCE METRICS CITED BY THE COMPANY JUSTIFY A HIGH ROE?

A. No. National Fuel points to metrics such as relatively low customer bills, operational efficiencies, and customer service performance. While these outcomes are positive, they do not justify an incremental ROE management premium for several reasons, including: 1) these outcomes are expected and reflect the core responsibilities of a prudently managed gas distribution utility, and 2) these metrics do not demonstrate that the Company faces greater financial risk, which is the fundamental basis for a higher ROE. In short, good management performance is not a separate risk factor warranting an additional premium return, it is the standard expectation embedded in the regulatory compact.

Q. WHAT IS THE REVENUE REQUIREMENT IMPACT IF THE MANAGEMENT PREMIUM IS REMOVED?

A. As reported in Table JBF-1, disallowing the 25-basis point management premium would reduce the revenue requirement by $1,191,103 in FPFTY 2027. This adjustment is shown in Exhibit JBF-4.

Q. WHAT OBSERVATIONS HAVE YOU MADE IN REGARD TO NATIONAL FUEL'S REQUESTED BASE ROE?

A. Mr. Nowack's recommended base ROE of 11.00% is high compared to the authorized ROE's from recent rate cases for the companies of similar risk included in his proxy group.

Q. PLEASE EXPLAIN.

A. Mr. Nowack's proxy group includes the following seven companies:

- Atmos Energy Corporation,
- New Jersey Resources Corporation,
- NiSource Inc.,
- Northwest Natural Holding Co.,
- ONE Gas Inc.,
- Southwest Gas Holdings, Inc.,
- and Spire, Inc.

These companies were included in the proxy group because they "possess a set of business and operating characteristics similar to the Company's (National Fuel's) natural gas utility operations, and thus provide a reasonable basis for estimating the Company's ROE"[8] based upon screening criteria that "reflect key risk factors that investors consider in making investments in natural gas utilities."[9]

Please refer to Table JBF-2 which shows both the utility requested ROE's and commission authorized ROE's approved for subsidiaries of the companies in

[8] National Fuel Statement No. 10, Direct Testimony of Joshua C. Nowak, page 23.
[9] National Fuel Statement No. 10, Direct Testimony of Joshua C. Nowak, page 27.

the proxy group since 2022, as reported by S&P Capital IQ. The median requested ROE for the proxy group was 10.85% and the median approved ROE for the proxy group was 9.75%. National Fuel's proposed base ROE of 11.00% is 125 basis points above the median approved ROE for the proxy group.

Table JBF-2
Survey of Approved ROE's for Natural Gas Distribution Companies in National Fuel's Proxy Group Between January 1, 2022 & March 26, 2026

Docket Number	Utility Name	State	Decision Type	Rate Case Completion Date	Requested ROE	Authorized ROE
D-OS-25-00028202	Texas Gas Service Company, Inc.	TX	Settled	2/5/2026	10.40%	9.80%
D-R-2025-3053499	Columbia Gas of Pennsylvania, Inc.	PA	Fully Litigated	12/4/2025	11.35%	10.00%
D-2025-UN-59	Atmos Energy Corporation	MS	Fully Litigated	11/4/2025	10.41%	9.40%
D-UG-520	Northwest Natural Gas Company	OR	Settled	10/24/2025	10.40%	9.50%
C-2024-00276	Atmos Energy Corporation	KY	Fully Litigated	8/11/2025	10.95%	9.75%
D-OS-24-00019196	Atmos Energy Corporation	TX	Settled	6/17/2025	10.85%	9.80%
C-9754	Columbia Gas of Maryland, Incorporated	MD	Fully Litigated	4/22/2025	11.05%	9.80%
C-2024-00092	Columbia Gas of Kentucky, Incorporated	KY	Settled	12/30/2024	10.80%	9.75%
D-GR24010071	New Jersey Natural Gas Company	NJ	Settled	11/21/2024	10.42%	9.60%
D-U-36658	Atmos Energy Corporation	LA	Settled	5/13/2024	Not Provided	9.80%
D-22AL-0348G	Atmos Energy Corporation	CO	Settled	5/4/2023	10.95%	9.30%
C-21-0637-GA-AIR	Columbia Gas of Ohio, Inc.	OH	Settled	1/26/2023	10.95%	9.60%
D-18328 (2022)	Spire Alabama Inc.	AL	Settled	9/30/2022	Not Provided	9.70%
				Mean	10.78%	9.68%
				Median	**10.85%**	**9.75%**

Q. HOW DOES MR. NOWACK'S PROXY GROUP COMPARE TO THE BAROMETER GROUP USED BY THE BUREAU OF TECHNICAL UTILITY SERVICES IN ITS REPORT ON THE QUARTERLY EARNINGS OF JURISDICTION UTILITIES?

A. The proxy group and the barometer group used by the Bureau of Technical Utility Services are very similar. The barometer group includes all of the utilities in the proxy group plus Chesapeake Utilities Corporation. When Chesapeake is added to the proxy the median authorized ROE is 9.73%

Q. HOW DOES THE MEDIAN OF THE PROXY GROUP COMPARE TO THE MEDIAN OF ALL GAS DISTRIBUTION RATE CASES DURING THE SAME TIME PERIOD?

A. When the sample size is expanded to include all natural gas distribution rate cases completed since January 1, 2022, the median authorized ROE drops to 9.65%, indicating a lower level or risk compared to companies included in the proxy group. Please refer to Exhibit JBF-6 for a list of all dockets included in the calculation of a median 9.65%.

Q. IN OFFERING THIS DISCUSSION OF PROXY GROUP AND NATIONAL TRENDS, ARE YOU INTENDING TO SUPPLANT THE COMMISSION'S CONSIDERATION OF TRADITIONAL COST-OF-CAPITAL ANALYSIS?

A. No, I fully expect that other intervenors will file cost-of-capital analyses for the Commission's consideration, along with that filed by National Fuel. My discussion of recently approved ROE's is intended to supplement other analyses.

Q. WHAT WOULD BE THE REVENUE REQUIREMENT IMPACT IF NATIONAL FUEL'S ROE WERE SET AT 9.75%

A. The revenue requirement impact of setting National Fuel's allowed ROE equal to 9.75% reduces the Company's revenue requirement by approximately $5,560,798 relative to the Company's filed case. This adjustment is incremental to my adjustment to remove the proposed 25 basis point management ROE premium explained above. The impact is included in my presentation of the OSBA's recommended revenue requirement in Table JBF-1. I have incorporated an ROE

of 9.75% into the OSBA's overall revenue requirement recommendations at this time, pending further information being presented into the record by other parties. This adjustment is shown in Exhibit JBF-5.

Section III – Class Cost of Service and Revenue Allocation

Q. PLEASE DESCRIBE THE METHOD USED BY NATIONAL FUEL TO ALLOCATE COSTS TO ITS CUSTOMER CLASSES.

A. As described by National Fuel witness Mr. John D Taylor, the Company proposes to allocate distribution mains costs to customer classes using a peak allocation methodology with distribution mains classified as demand and customer related. Specifically, the Company classified 61% of its investment in distribution mains as customer-related and 39% of the investment as demand related. The customer-related portion of the distribution mains investment was then allocated to the rate classes based on the number of customers on the system. The demand related portion was allocated to the rate classes based on their respective contribution to the Company's peak day demand under system design and weather conditions (design-day basis).

Transmission mains are allocated to the customer classes based on the contribution to peak day demand. The company used special cost studies to allocate meters, services, and regulators.[10]

[10] National Fuel Statement No. 19, Direct Testimony of John D. Taylor, page 12.

Q. DO YOU HAVE ANY COMMENTS ON THE COST ALLOCATION METHODS USED BY NATIONAL FUEL?

A. Yes. Overall, I find that National Fuel's cost allocation methods, as described by Mr. Taylor, align with cost causation principles. Accordingly, I do not recommend any changes to the Company's cost allocation methods in this case.

Q. PLEASE DESCRIBE NATIONAL FUEL'S REVENUE ALLOCATION PROPOSAL.

A. The Company recommends an approach in which class rate increases are guided by the results of the Class Cost of Service study, but without moving all classes to fully-cost-based rates in the interest of gradualism. More specifically, for the classes with a revenue-to-cost parity ratio below 1.0, the Company proposes an increase of 1.1 times the system increase. This applies to the Residential class and NGV class. For those classes with a revenue-to-cost parity ratio greater than 1.0, but less than 1.5, the Company proposes an increase of 0.9 times the system increase. This applies to the SCPA-LL and SCPA-UL classes. And for all other classes with revenue-to-cost parity ratios above 1.5, the Company proposes an increase of .67 times the system increase, which recovers the Company's remaining requested increase. This applies to the LCPA, SVIS, IVIS, LVIS, and LIS classes.[11]

Q. WHAT IS YOUR ASSESSMENT OF NATIONAL FUEL'S REVENUE ALLOCATION PROPOSAL?

[11] National Fuel Statement No. 19, Direct Testimony of John D. Taylor, page 21.

A. The Company's revenue allocation proposal reasonably balances moving class revenue recovery in the direction of cost causation, while adhering to the principle of gradualism. In my opinion, the proposed revenue allocation falls within the range of reasonableness.

Q. WHAT WOULD BE THE IMPACT TO EXISTING RATES IF YOUR RECOMMENDATIONS ARE ADOPTED BY THE COMMISSION?

A. If the Commission were to adopt the recommendations included in my direct testimony, the average rate increase for Pennsylvania retail customers would be 7.7%. This is a reduction of 6.3% from the Company's requested 14.0%.

To the extent the Commission does approve a revenue requirement that is lower than National Fuel's request, I recommend that the Company's revenue allocation be used to establish each rate classes percentage share of the final base revenue requirement. Specifically, each customer classes base rate revenue requirement should be adjusted by an equal percentage to recover the final approved revenue requirement. Table JBF-3 shows each classes rate increase that would result from incorporating the Company's proposed revenue allocation methodology and my recommended adjustments to the proposed revenue requirement.

Table JBF-3
% Increase in Base Rates by Customer Class

Rate Class	National Fuel Request: Base Rate Increase ($)	National Fuel Request: Base Rate Increase (%)	OSBA Adjustments: Base Rate Increase ($)	OSBA Adjustments: Base Rate Increase (%)
Residential	$ 15,403,535	15.8%	$ 9,229,006	9.5%
Total Residential	15,403,535	15.8%	9,229,006	9.5%
SCPA<250	882,692	12.9%	460,975	6.8%
SCPA>250	904,611	12.9%	472,422	6.8%
LCPA	1,341,863	9.6%	506,912	3.6%
NGV	20,763	15.8%	12,440	9.5%
SVIS	42,813	9.6%	16,173	3.6%
IVIS	566,965	9.6%	214,181	3.6%
LVIS	263,427	9.6%	99,514	3.6%
LIS	238,351	9.6%	90,041	3.6%
LIS Negotiated	(68,334)	-2.3%	(225,851)	-7.7%
Total Commercial and Industrial	4,193,151	9.9%	1,646,808	3.9%
Other Operating Revenue	83,817	6.6%	9,507	0.7%
Total Pennsylvania Retail	**$ 19,680,503**	**14.0%**	**$ 10,885,321**	**7.7%**

The derivation of class revenue increases in Table JBF-3 is shown in Exhibit JBF-7.

Section IV – Energy Efficiency

Q. DOES NATURAL FUEL OFFER AN ENERGY EFFICIENCY PROGRAM?

A. No, the Company does not currently have an Energy Efficiency (EE) program in Pennsylvania. However, they are proposing an EE program in this rate proceeding.

Q. PLEASE BRIEFLY SUMMARIZE NATIONAL FUEL'S EE PROPOSAL.

A. National Fuel proposes implementing an EE program over a five-year period beginning in October 2026. The proposed program will provide rebate incentives to residential customers to encourage the installation of high-efficiency natural gas space heating, water heating, and clothes drying appliances.

Q. DOES NATURAL FUEL'S PROPOSAL INCLUDE AN EE PROGRAM FOR NON-RESIDENTIAL CUSTOMERS?

A. No, it does not.

Q. DOES THE COMPANY HAVE ANY EXPERIENCE RUNNING AN EE PROGRAM INCLUDING A PROGRAM FOR NON-RESIDENTIAL CUSTOMERS?

A. Yes, it does. Natural Fuel's New York division has been running an EE program for over 17 years.[12] It is my understanding that the Company's EE program in NY includes both residential and non-residential programs.[13] The non-residential program in New York provides rebates for replacing specified appliances with new, energy efficient models. Please see Exhibit JBF-8 for fixed rebate information for non-residential customers in the Company's New York territory.

Q. DO YOU HAVE A RECOMMENDATION?

A. Yes. I recommend that National Fuel include in its proposal an energy efficiency program for non-residential customers based upon the Company's experience running the non-residential program in New York.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes, it does.

[12] National Fuel Statement No. 18, Direct Testimony of Erik M. Solomon, page 4.
[13] See https://www.nationalfuel.com/utility/energy-efficiency-rebate-program/

APPENDIX

Vitae & Expert Testimony List

of Justin B. Farr

APPENDIX

Justin B. Farr

Director, Energy Strategies, L.L.C.
111 East Broadway, Suite 1200, Salt Lake City, UT 84111
jfarr@energystrat.com

Vitae

Professional Experience

Energy Strategies, Salt Lake City UT, April 2022 - Present
An energy consulting firm focused on regulatory services, policy, and markets serving power producers, transmission developers, utilities, government agencies, NGO's, and large energy users

Director

- Perform energy-related economic and policy analysis, regulatory intervention, and strategic negations on behalf of industrial, commercial, and public sector interests
- Provide risk management and market fundamentals analysis to large consumers of natural gas
- Executive director of the Utah Association of Energy Users

PacifiCorp, Salt Lake City UT, January 2020 – April 2022
Berkshire Hathaway owned electric utility serving over 1.6 million customers in Utah, Oregon, Washington, Wyoming, Idaho, and parts of Northern California

Assistant Manager of Regulation, March 2021 – April 2022
Senior Fuels Manager, January 2020 – March 2021

- Performed rate projections tied to the company's 10-year plan
- Provided testimony on the Renewable Energy Credits balancing account
- Procured fuel and managed contracts for company owned and jointly owned thermal plants

Magnum Development, Holladay UT, 2017 – Oct 2019
Private Equity backed developer of utility-scale storage in underground salt caverns. Developing storage for natural gas, compressed air created from renewable electricity, green hydrogen, and helium.

Vice President of Financial Planning, January 2019 – October 2019
Assistant Vice President of Financial Planning, February 2017 – December 2018

- Worked on commercial team developing bidding strategies and analysis to support joint development negotiations

- Managed all financial and economic modeling across all of Magnum's business verticals including: Magnum Midstream (Natural Gas), Magnum Compressed Air Energy Storage (CAES), Magnum Hydrogen, and Magnum Industrial Gases (Helium)

PacifiCorp, Salt Lake City UT, 2013 – 2017
Berkshire Hathaway owned electric utility serving over 1.6 million customers in Utah, Oregon, Washington, Wyoming, Idaho, and parts of Northern California

Manager Economic & Financial Analysis, August 2015 – February 2017
Senior Financial Planning Analyst, October 2013 – August 2015

- Managed team of Sr. Financial Analysts responsible for economic analysis, internal audit of joint owned plants, and annual budget of resource development division
- Led team of engineers, plant managers, and vice presidents in developing economic solutions that optimized existing thermal and renewable infrastructure investment
- Developed economic models to explore new resource development opportunities such as utility scale solar and battery installations
- Prepared annual cost of generation report for senior management

Energy Strategies, Salt Lake City UT, 2005 – 2013
An energy consulting firm focused on regulatory services, policy, and markets serving power producers, transmission developers, utilities, government agencies, NGO's, and large energy users

Senior Consultant, January 2010 – October 2013
Consultant, July 2005 – December 2009

- Developed strategies for clients with energy infrastructure that optimized environmental performance and financial objectives while meeting their utility requirements
- Performed market studies focused on thermal & renewable energy need, transmission availability, pricing, and impacts of public policy initiatives. Studies were designed to inform and improve clients' energy decisions including risk management and procurement strategy.

Education

- Master of Business Administration, University of Utah, May 2005
- Bachelor of Science in Economics/Business Minor, University of Utah, May 2000
- Graduated Magna Cum Laude; GPA 3.92
- Honors at Entrance Scholarship; 1999-2000 Law & Economic Society Fellowship

Expert Testimony

"In the Matter of the Petition of PPL Electric Utilities Corp for Approval of its Second Distributed Energy Resources Management Plan," Public Utilities Commission of **Pennsylvania**, Docket No. P-2024-3049223. Direct testimony submitted September 17, 2024. Surrebuttal testimony filed January 22, 2024.

"In the Matter of the Verified Petition of Indiana Michigan Power Company for Approval of Modifications to its Industrial Power Tariff – Tariff IP," **Indiana** Utility Regulatory Commission, Cause No. 46097. Direct testimony submitted October 15, 2024. Cross-Answering testimony filed November 4, 2024. Settlement testimony filed December 4, 2024.

"In the Matter of the Application of Rocky Mountain Power for Authority to Revise Rates in Tariff Schedule 98, Renewable Energy Credits Balancing Account," **Utah** Public Service Commission, Docket No. 22-035-07. Direct testimony submitted March 15, 2022.

"In the Matter of the Petition of Wellsboro Electric Company for Approval of its Application to Increase Distribution Rates," Public Utilities Commission of **Pennsylvania**, Docket No. R-2025-3054392. Direct testimony submitted July 15, 2025. Rebuttal testimony filed August 13, 2025. Surrebuttal testimony filed August 28, 2025.

"In the Matter of the Petition of Valley Energy, Inc. for Approval of its Application to Increase Distribution Rates," Public Utilities Commission of **Pennsylvania**, Docket No. R-2025-3054393. Direct testimony submitted July 15, 2025. Surrebuttal testimony filed August 28, 2025.

"In the Matter of the Petition of Citizen's Electric Company of Lewisburg, PA for Approval of its Application to Increase Distribution Rates," Public Utilities Commission of **Pennsylvania**, Docket No. R-2025-3054394. Direct testimony submitted July 15, 2025. Rebuttal testimony filed August 13, 2025. Surrebuttal testimony filed August 28, 2025.

"In the Matter of the Petition of PECO Energy Company for Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan," Public Utilities Commission of **Pennsylvania**, Docket No. M-2025-3057328. Rebuttal testimony filed January 30,2026.

"In the Matter of the Petition of Duquesne Light Company for Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan," Public Utilities Commission of **Pennsylvania**, Docket No. M-2025-3057325. Rebuttal testimony filed January 30,2026.

EXHIBIT JBF-1

Summary of OSBA Adjustments

Summary of Recommended Revenue Requirement Adjustments

Line #	Description	Function	National Fuel Proposed	Employee Count Adjustment: OSBA Adjusted	Employee Count Adjustment: Adjustment	Stock-based Compensation: OSBA Adjusted	Stock-based Compensation: Adjustment
RATE BASE							
1	Utility Plant		$ 957,237	$ 957,237	$ -	$ 957,237	$ -
2	Accumulated Depreciation		(320,571)	(320,571)	-	(320,571)	-
3	Net Plant in service		636,667	636,667	-	636,667	-
4	Working Capital		6,755	6,755	-	6,755	-
5	Gas Inventory		5,664	5,664	-	5,664	-
6	Accumulated Deferred Income Taxes		(73,925)	(73,925)	-	(73,925)	-
7	Customer Deposits		(5,166)	(5,166)	-	(5,166)	-
8	Materials & Supplies		1,587	1,587	-	1,587	-
9	TOTAL RATE BASE		$ 571,582	$ 571,582	$ -	$ 571,582	$ -
OPERATING REVENUES AND EXPENSES							
	Operating Revenues						
10	Base Customer Charges		$ 139,680	$ 139,680	$ -	$ 139,680	$ -
11	Gas Cost Revenue		124,571	124,571	-	124,571	-
12	Other Operating Revenues		1,273	1,273	-	1,273	-
13	Total Revenues		265,524	265,524	-	265,524	-
14	Operating Expenses		(231,839)	(231,360)	479	(229,978)	1,382
15	OIBIT		33,685	34,165	479	35,547	1,382
16	Pro Forma Income Tax at Present Rate		2,340	2,239	(101)	1,949	(290)
17	Pro Forma Income Tax on Revenue Increase						
18	NET OPERATING INCOME		$ 36,025	$ 36,403	$ 378	$ 37,495	$ 1,092
19	RATE OF RETURN		6.30%	6.37%	0.07%	6.56%	0.19%
20	RETURN ON EQUITY		6.87%	6.98%	0.12%	7.32%	0.34%
REVENUE INCREASE REQUIRED							
21	Rate of Return at Present Rates		6.30%	6.37%	0.07%	6.56%	0.19%
22	Rate of Return Required		8.78%	8.78%	0.00%	8.78%	0.00%
23	Change in ROR		2.48%	2.41%	-0.07%	2.22%	-0.19%
24	Change in Operating Income		$ 14,160	$ 13,782	$ (378)	$ 12,690	$ (1,092)
25	Gross Revenue Conversion Factor		1.3899	1.3899	-	1.3899	-
26	Change in Revenues		$ 19,680	$ 19,155	$ (525)	$ 17,637	$ (1,518)

Summary of Recommended Revenue Requirement Adjustments

Line #	Description	Function	Management Premium Adjustment OSBA Adjusted	Management Premium Adjustment Adjustment	Proxy ROE Adjustment OSBA Adjusted	Proxy ROE Adjustment Adjustment
RATE BASE						
1	Utility Plant		$ 957,237	$ -	$ 957,237	$ -
2	Accumulated Depreciation		(320,571)	-	(320,571)	-
3	Net Plant in service		636,667	-	636,667	-
4	Working Capital		6,755	-	6,755	-
5	Gas Inventory		5,664	-	5,664	-
6	Accumulated Deferred Income Taxes		(73,925)	-	(73,925)	-
7	Customer Deposits		(5,166)	-	(5,166)	-
8	Materials & Supplies		1,587	-	1,587	-
9	TOTAL RATE BASE		$ 571,582	$ -	$ 571,582	$ -
OPERATING REVENUES AND EXPENSES						
	Operating Revenues					
10	Base Customer Charges		$ 139,680	$ -	$ 139,680	$ -
11	Gas Cost Revenue		124,571	-	124,571	-
12	Other Operating Revenues		1,273	-	1,273	-
13	Total Revenues		265,524	-	265,524	-
14	Operating Expenses		(229,978)	-	(229,978)	-
15	OIBIT		35,547	-	35,547	-
16	Pro Forma Income Tax at Present Rates		1,949	-	1,949	-
17	Pro Forma Income Tax on Revenue Incre					
18	NET OPERATING INCOME		$ 37,495	$ -	$ 37,495	$ -
19	RATE OF RETURN		6.56%	0.00%	6.56%	0.00%
20	RETURN ON EQUITY		7.32%	0.00%	7.32%	0.00%
REVENUE INCREASE REQUIRED						
21	Rate of Return at Present Rates		6.56%	0.00%	6.56%	0.00%
22	Rate of Return Required		8.63%	-0.15%	7.93%	-0.70%
23	Change in ROR		2.07%	-0.15%	1.37%	-0.70%
24	Change in Operating Income		$ 11,833	$ (857)	$ 7,832	$ (4,001)
25	Gross Revenue Conversion Factor		1.3899	-	1.3899	-
26	Change in Revenues		$ 16,446	$ (1,191)	$ 10,885	$ (5,561)

EXHIBIT JBF-2

OSBA Employee Count Adjustment

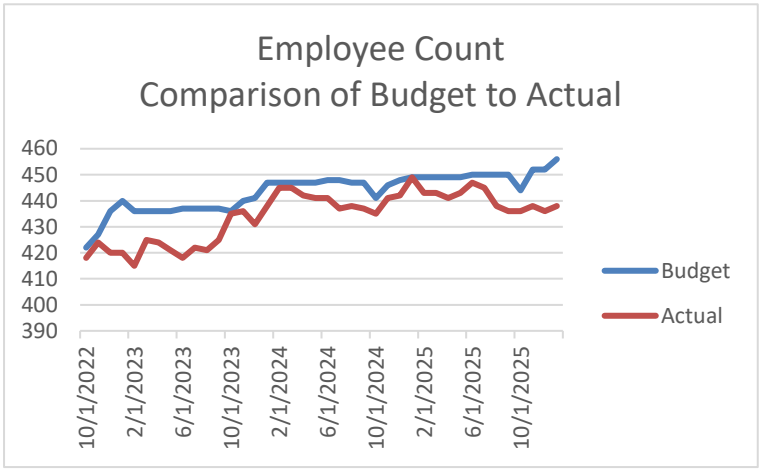
OSBA
Employee Count Adjustment
Revenue Requirement Impact

Line #	Description	Function	National Fuel Proposed	OSBA Adjusted	Adjustment
RATE BASE					
1	Utility Plant		$ 957,237	$ 957,237	$ -
2	Accumulated Depreciation		(320,571)	(320,571)	-
3	Net Plant in service		636,667	636,667	-
4	Working Capital		6,755	6,755	-
5	Gas Inventory		5,664	5,664	-
6	Accumulated Deferred Income Taxes		(73,925)	(73,925)	-
7	Customer Deposits		(5,166)	(5,166)	-
8	Materials & Supplies		1,587	1,587	-
9	TOTAL RATE BASE		$ 571,582	$ 571,582	$ -
OPERATING REVENUES AND EXPENSES					
	Operating Revenues				
10	Base Customer Charges		$ 139,680	$ 139,680	$ -
11	Gas Cost Revenue		124,571	124,571	-
12	Other Operating Revenues		1,273	1,273	-
13	Total Revenues		265,524	265,524	-
14	Operating Expenses		(231,839)	(231,360)	479
15	OIBIT		33,685	34,165	479
16	Pro Forma Income Tax at Present Rate		2,340	2,239	(101)
17	Pro Forma Income Tax on Revenue Increase				
18	NET OPERATING INCOME		$ 36,025	$ 36,403	$ 378
19	RATE OF RETURN		6.30%	6.37%	0.07%
20	RETURN ON EQUITY		6.87%	6.98%	0.12%
REVENUE INCREASE REQUIRED					
21	Rate of Return at Present Rates		6.30%	6.37%	0.07%
22	Rate of Return Required		8.78%	8.78%	0.00%
23	Change in ROR		2.48%	2.41%	-0.07%
24	Change in Operating Income		$ 14,160	$ 13,782	$ (378)
25	Gross Revenue Conversion Factor		1.3899	1.3899	-
26	Change in Revenues		$ 19,680	$ 19,155	$ (525)

Line #	Input	FPFTY	Calculation	Source
(1)	Forecasted Headcount for RR	450		Exhibit AT-4, Schedule 4 (Labor Savings), Page 1 (Electronic copy provided in response to E&E-RE-D-3 - 2026 PA Rate Case Labor Forecast)
(2)	Actual Headcount from most recent 12 Months	440.33		Calculated from Response to I&E-RE-D-8 - A and C (Feb 25 - Jan 26)
(3)	Headcount Differential	(9.67)	= (2) - (1)	
(4)	O&M Factor	73.14%		Response to I&E RE-D-9, page 1
(5)	Avg. Wage Rate	$67,766.4		Exhibit AT-4, Schedule 4 (Labor Savings), Page 1 (Electronic copy provided in response to E&E-RE-D-3 - 2026 PA Rate Case Labor Forecast)
(6)	OSBA Adjustment	**($479,122)**	= (3) x (4) x (5)	

	Budget	Actual	Difference
10/31/2022	422	418	4
11/30/2022	427	424	3
12/31/2022	436	420	16
1/31/2023	440	420	20
2/28/2023	436	415	21
3/31/2023	436	425	11
4/30/2023	436	424	12
5/31/2023	436	421	15
6/30/2023	437	418	19
7/31/2023	437	422	15
8/31/2023	437	421	16
9/30/2023	437	425	12
10/31/2023	436	435	1
11/30/2023	440	436	4
12/31/2023	441	431	10
1/31/2024	447	438	9
2/29/2024	447	445	2
3/31/2024	447	445	2
4/30/2024	447	442	5
5/31/2024	447	441	6
6/30/2024	448	441	7
7/31/2024	448	437	11
8/31/2024	447	438	9
9/30/2024	447	437	10
10/31/2024	441	435	6
11/30/2024	446	441	5
12/31/2024	448	442	6
1/31/2025	449	449	0
2/28/2025	449	443	6
3/31/2025	449	443	6
4/30/2025	449	441	8
5/31/2025	449	443	6
6/30/2025	450	447	3
7/31/2025	450	445	5
8/31/2025	450	438	12
9/30/2025	450	436	14
10/31/2025	444	436	8
11/30/2025	452	438	14
12/31/2025	452	436	16
1/31/2026	456	438	18

	Budgeted	Actual	
Most Rece	450	440.33	9.67



Source: Response to I&E-RE-D-8 - A and C

Employee Count Information

Headcount - PAD

	Oct-22			Nov-22			Dec-22			Jan-23			Feb-23			Mar-23			Apr-23			May-23			Jun-23			Jul-23			Aug-23			Sep-23		
	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance
Excluded/Non-Union Hourly	104	105	(1)	105	108	(3)	112	104	8	112	104	8	112	100	12	112	111	1	112	110	2	112	108	4	112	107	5	112	111	1	112	108	4	112	108	4
Executive	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-
Union Hourly	206	203	3	209	205	4	211	206	5	215	207	8	213	204	9	213	202	11	213	202	11	213	200	13	213	198	15	213	199	14	213	202	11	213	205	8
Supervisors	110	108	2	111	109	2	111	108	3	111	107	4	109	109	-	109	110	(1)	109	110	(1)	109	111	(2)	110	111	(1)	110	110	-	110	109	1	110	110	-
	422	418	4	427	424	3	436	420	16	440	420	20	436	415	21	436	425	11	436	424	12	436	421	15	437	418	19	437	422	15	437	421	16	437	425	12

	Oct-23			Nov-23			Dec-23			Jan-24			Feb-24			Mar-24			Apr-24			May-24			Jun-24			Jul-24			Aug-24			Sep-24		
	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance
Excluded/Non-Union Hourly	110	114	(4)	112	114	(2)	112	110	2	112	113	(1)	112	113	(1)	112	113	(1)	112	115	(3)	112	114	(2)	112	114	(2)	112	110	2	112	110	2	112	110	2
Executive	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-
Union Hourly	210	206	4	211	207	4	212	206	6	216	207	9	216	210	6	216	209	7	216	204	12	216	205	11	216	204	12	216	203	13	216	205	11	216	204	12
Supervisors	114	113	1	115	113	2	115	113	2	117	116	1	117	120	(3)	117	121	(4)	117	121	(4)	117	120	(3)	118	121	(3)	118	122	(4)	117	121	(4)	117	121	(4)
	436	435	1	440	436	4	441	431	10	447	438	9	447	445	2	447	445	2	447	442	5	447	441	6	448	441	7	448	437	11	447	438	9	447	437	10

	Oct-24			Nov-24			Dec-24			Jan-25			Feb-25			Mar-25			Apr-25			May-25			Jun-25			Jul-25			Aug-25			Sep-25		
	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance
Excluded/Non-Union Hourly	111	109	2	111	109	2	111	109	2	111	115	(4)	111	114	(3)	111	111	-	111	111	-	111	110	1	111	111	-	111	108	3	111	106	5	111	104	7
Executive	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-	2	2	-	2	1	1	2	1	1	2	1	1	2	-	2	2	-	2	2	-	2
Union Hourly	209	204	5	214	210	4	216	210	6	216	210	6	216	206	10	216	208	8	216	206	10	216	208	8	216	210	6	216	211	5	216	210	6	216	210	6
Supervisors	119	120	(1)	119	120	(1)	119	121	(2)	120	122	(2)	120	121	(1)	120	122	(2)	120	123	(3)	120	124	(4)	121	125	(4)	121	126	(5)	121	122	(1)	121	122	(1)
	441	435	6	446	441	5	448	442	6	449	449	-	449	443	6	449	443	6	449	441	8	449	443	6	450	447	3	450	445	5	450	438	12	450	436	14

	Oct-25			Nov-25			Dec-25			Jan-26			FTY*			FPFTY*		
	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance	Budget	Actual	Variance
Excluded/Non-Union Hourly	108	107	1	108	106	2	108	105	3	112	108	4	112		112	114		114
Executive	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Union Hourly	210	206	4	217	208	9	217	207	10	217	205	12	216		216	219		219
Supervisors	126	123	3	127	124	3	127	124	3	127	125	2	125		125	126		126
	444	436	8	452	438	14	452	436	16	456	438	18	453	-	453	459	-	459

* FTY & FPFTY budgeted headcounts do not include the vacancy adjustment shown in Exhibit ATF-4, Schedule 4

Source: Company response to I&E-RE-D-8 - A and C

EXHIBIT JBF-3

OSBA Stock-based Compensation Adjustment

OSBA
Stock-based Compensation Adjustment
Revenue Requirement Impact

Line #	Description	Function	OSBA Adjusted	Adjustment
RATE BASE				
1	Utility Plant		$ 957,237	$ -
2	Accumulated Depreciation		(320,571)	-
3	Net Plant in service		636,667	-
4	Working Capital		6,755	-
5	Gas Inventory		5,664	-
6	Accumulated Deferred Income Taxes		(73,925)	-
7	Customer Deposits		(5,166)	-
8	Materials & Supplies		1,587	-
9	TOTAL RATE BASE		$ 571,582	$ -
OPERATING REVENUES AND EXPENSES				
	Operating Revenues			
10	Base Customer Charges		$ 139,680	$ -
11	Gas Cost Revenue		124,571	-
12	Other Operating Revenues		1,273	-
13	Total Revenues		265,524	-
14	Operating Expenses		(229,978)	1,382
15	OIBIT		35,547	1,382
16	Pro Forma Income Tax at Present Rate		1,949	(290)
17	Pro Forma Income Tax on Revenue Increase			
18	NET OPERATING INCOME		$ 37,495	$ 1,092
19	RATE OF RETURN		6.56%	0.19%
20	RETURN ON EQUITY		7.32%	0.34%
REVENUE INCREASE REQUIRED				
21	Rate of Return at Present Rates		6.56%	0.19%
22	Rate of Return Required		8.78%	0.00%
23	Change in ROR		2.22%	-0.19%
24	Change in Operating Income		$ 12,690	$ (1,092)
25	Gross Revenue Conversion Factor		1.3899	-
26	Change in Revenues		$ 17,637	$ (1,518)

Line #	Input	FPFTY	Calculation	Source
(1)	Restricted Stock for Supervisory Staff - Charge to O&M	$182,075		Exhibit No. MPW-1, Schedule 2 (Benefits), Page 14
(2)	Restricted Stock for Officers - Charged to O&M	$290,746		Exhibit No. MPW-1, Schedule 2 (Benefits), Page 14
(3)	Performance Shares for Officers - Charged to O&M	$957,138		Exhibit No. MPW-1, Schedule 2 (Benefits), Page 14
(4)		$1,429,959	= (1) + (2) + (3)	
(5)	% of annual grants tied to ESG	5%		Company Response to I&E-RE-35-E
(6)	$ of annual grants tied to ESG	(47,857)	= -(4) x (5)	
(7)	OSBA Adjustment	**(1,382,102)**	= - ((4) + (6))	

EXHIBIT JBF-4

OSBA Management Premium Adjustment

to ROE

OSBA
Management Premium Adjustment
Revenue Requirement Impact

Line #	Description	Function	OSBA Adjusted	Adjustment
RATE BASE				
1	Utility Plant		$ 957,237	$ -
2	Accumulated Depreciation		(320,571)	-
3	Net Plant in service		636,667	-
4	Working Capital		6,755	-
5	Gas Inventory		5,664	-
6	Accumulated Deferred Income Taxes		(73,925)	-
7	Customer Deposits		(5,166)	-
8	Materials & Supplies		1,587	-
9	TOTAL RATE BASE		$ 571,582	$ -
OPERATING REVENUES AND EXPENSES				
	Operating Revenues			
10	Base Customer Charges		$ 139,680	$ -
11	Gas Cost Revenue		124,571	-
12	Other Operating Revenues		1,273	-
13	Total Revenues		265,524	-
14	Operating Expenses		(229,978)	-
15	OIBIT		35,547	-
16	Pro Forma Income Tax at Present Rate		1,949	-
17	Pro Forma Income Tax on Revenue Increase			
18	NET OPERATING INCOME		$ 37,495	$ -
19	RATE OF RETURN		6.56%	0.00%
20	RETURN ON EQUITY		7.32%	0.00%
REVENUE INCREASE REQUIRED				
21	Rate of Return at Present Rates		6.56%	0.00%
22	Rate of Return Required		8.63%	-0.15%
23	Change in ROR		2.07%	-0.15%
24	Change in Operating Income		$ 11,833	$ (857)
25	Gross Revenue Conversion Factor		1.3899	-
26	Change in Revenues		$ 16,446	$ (1,191)

Line #	Description	Management Premium Adder to ROE	Source
(1)	National Fuel Proposed	0.25%	NFGDC Statement No. 10, Direct Testimony of Joshua C. Nowak, pages 3-4
(2)	OSBA Adjustment	-0.25%	
(3)	OSBA Management Premium included in calculation of Revenue Requirement	0%	

EXHIBIT JBF-5

Approved ROE's for Companies in Natural Fuel's Proxy Group

OSBA
Proxy ROE Adjustment
Revenue Requirement Impact

Line #	Description	Function	OSBA Adjusted	Adjustment
RATE BASE				
1	Utility Plant		$ 957,237	$ -
2	Accumulated Depreciation		(320,571)	-
3	Net Plant in service		636,667	-
4	Working Capital		6,755	-
5	Gas Inventory		5,664	-
6	Accumulated Deferred Income Taxes		(73,925)	-
7	Customer Deposits		(5,166)	-
8	Materials & Supplies		1,587	-
9	TOTAL RATE BASE		$ 571,582	$ -
OPERATING REVENUES AND EXPENSES				
	Operating Revenues			
10	Base Customer Charges		$ 139,680	$ -
11	Gas Cost Revenue		124,571	-
12	Other Operating Revenues		1,273	-
13	Total Revenues		265,524	-
14	Operating Expenses		(229,978)	-
15	OIBIT		35,547	-
16	Pro Forma Income Tax at Present Rate		1,949	-
17	Pro Forma Income Tax on Revenue Increase			
18	NET OPERATING INCOME		$ 37,495	$ -
19	RATE OF RETURN		6.56%	0.00%
20	RETURN ON EQUITY		7.32%	0.00%
REVENUE INCREASE REQUIRED				
21	Rate of Return at Present Rates		6.56%	0.00%
22	Rate of Return Required		7.93%	-0.70%
23	Change in ROR		1.37%	-0.70%
24	Change in Operating Income		$ 7,832	$ (4,001)
25	Gross Revenue Conversion Factor		1.3899	-
26	Change in Revenues		$ 10,885	$ (5,561)

Line #	Description	Base ROE	Source
(1)	National Fuel Proposed	11.00%	National Fuel Statement No. 10, Direct Testimony of Joshua C. Nowak, pages 3-4
(2)	Median ROE from Proxy Group	9.75%	S&P Capital IQ: Filtered for Rate Cases completed since 2022 for Proxy Group included in National Fuel Statement No. 10
(3)	OSBA Proxy ROE included in calculation of Revenue Requirement	9.75%	

Proxy Group ROE

Docket Number	Utility Name	State	Decision Type	Rate Case Completion Date	Requested ROE	Authorized ROE
D-OS-25-00028202	Texas Gas Service Company, Inc.	TX	Settled	2/5/2026	10.40%	9.80%
D-R-2025-3053499	Columbia Gas of Pennsylvania, Inc.	PA	Fully Litigated	12/4/2025	11.35%	10.00%
D-2025-UN-59	Atmos Energy Corporation	MS	Fully Litigated	11/4/2025	10.41%	9.40%
D-UG-520	Northwest Natural Gas Company	OR	Settled	10/24/2025	10.40%	9.50%
C-2024-00276	Atmos Energy Corporation	KY	Fully Litigated	8/11/2025	10.95%	9.75%
D-OS-24-00019196	Atmos Energy Corporation	TX	Settled	6/17/2025	10.85%	9.80%
C-9754	Columbia Gas of Maryland, Incorporated	MD	Fully Litigated	4/22/2025	11.05%	9.80%
C-2024-00092	Columbia Gas of Kentucky, Incorporated	KY	Settled	12/30/2024	10.80%	9.75%
D-GR24010071	New Jersey Natural Gas Company	NJ	Settled	11/21/2024	10.42%	9.60%
D-U-36658	Atmos Energy Corporation	LA	Settled	5/13/2024	Not Provided	9.80%
D-22AL-0348G	Atmos Energy Corporation	CO	Settled	5/4/2023	10.95%	9.30%
C-21-0637-GA-AIR	Columbia Gas of Ohio, Inc.	OH	Settled	1/26/2023	10.95%	9.60%
D-18328 (2022)	Spire Alabama Inc.	AL	Settled	9/30/2022	Not Provided	9.70%
				Mean	10.78%	9.68%
				Median	**10.85%**	**9.75%**

Filters:
Utility Name: Included in Nowak Proxy Group
Case Type: Distribution (no limited issue rider cases)
Most Recently Completed: Yes
Rate Case Completion Date: =>2022
Authorized ROE: Removed all NA's

EXHIBIT JBF-6

Approved ROE's from Recent Natural Gas Distribution Company Rate Cases

Docket Number	Utility Name	State	Decision Type	Rate Case Completion Date	Requested ROE	Authorized ROE
C-INT-G-25-02	Intermountain Gas Company	ID	Settled	12/30/2025	10.80%	9.50%
C-2025-00125	Duke Energy Kentucky, Inc.	KY	Settled	12/23/2025	10.75%	9.80%
A-25-03-011	Southern California Gas Company	CA	Fully Litigated	12/18/2025	11.00%	9.78%
D-24-1044	Delmarva Power & Light Company	DE	Settled	12/17/2025	10.65%	9.60%
D-G-5, Sub 686	Public Service Company of North Carolina, Incorporat	NC	Settled	12/9/2025	10.60%	9.65%
D-NG-124	Black Hills Nebraska Gas, LLC	NE	Settled	12/9/2025	10.50%	9.85%
D-R-2025-3053499	Columbia Gas of Pennsylvania, Inc.	PA	Fully Litigated	12/4/2025	11.35%	10.00%
D-3270-UR-126 (Gas)	Madison Gas and Electric Company	WI	Settled	11/20/2025	10.00%	9.80%
FC-1180	Washington Gas Light Company	DC	Fully Litigated	11/20/2025	10.50%	9.65%
D-2024-05-053 (gas)	NorthWestern Energy Group, Inc.	MT	Settled	11/19/2025	10.80%	9.60%
D-25-0055	Northern Illinois Gas Company	IL	Fully Litigated	11/19/2025	10.35%	9.60%
D-25-0084	Ameren Illinois Company	IL	Fully Litigated	11/19/2025	10.70%	9.60%
D-4220-UR-127 (Gas)	Northern States Power Company	WI	Fully Litigated	11/6/2025	10.00%	9.80%
D-6680-UR-125 (Gas)	Wisconsin Power and Light Company	WI	Settled	11/6/2025	9.90%	9.80%
D-24-12-01	Yankee Gas Services Company	CT	Fully Litigated	11/5/2025	10.80%	9.48%
D-2025-UN-59	Atmos Energy Corporation	MS	Fully Litigated	11/4/2025	10.41%	9.40%
D-UG-520	Northwest Natural Gas Company	OR	Settled	10/24/2025	10.40%	9.50%
D-2024-05-061	MDU Resources Group, Inc.	MT	Settled	10/8/2025	10.80%	9.60%
D-20250029-GU	Peoples Gas System	FL	Settled	10/7/2025	10.91%	10.30%
C-U-21806	Consumers Energy Company	MI	Fully Litigated	9/30/2025	10.25%	9.80%
C-AVU-G-25-01	Avista Corporation	ID	Settled	8/29/2025	10.40%	9.60%
D-DG-23-067	Liberty Utilities (EnergyNorth Natural Gas) Corp.	NH	Settled	8/26/2025	10.35%	9.30%
24-G-0462	Central Hudson Gas & Electric Corporation	NY	Settled	8/14/2025	10.00%	9.50%
C-24-G-0323	Niagara Mohawk Power Corporation	NY	Settled	8/14/2025	10.00%	9.50%
C-2024-00276	Atmos Energy Corporation	KY	Fully Litigated	8/11/2025	10.95%	9.75%
C-2024-00346	Delta Natural Gas Company, Inc.	KY	Settled	7/1/2025	10.95%	9.75%
C-23-0894-GA-AIR	The East Ohio Gas Company	OH	Fully Litigated	6/26/2025	9.85%	9.79%
D-30013-415-GR-24	MDU Resources Group, Inc.	WY	Settled	6/24/2025	10.80%	9.65%
D-NG-0122	NorthWestern Energy Group, Inc.	NE	Settled	6/24/2025	10.70%	9.55%
D-24-0906	Chesapeake Utilities Corporation	DE	Settled	6/18/2025	11.50%	9.60%
D-OS-24-00019196	Atmos Energy Corporation	TX	Settled	6/17/2025	10.85%	9.80%
C-24-G-0447	Corning Natural Gas Corporation	NY	Settled	6/12/2025	10.40%	9.50%
D-UG-519	Avista Corporation	OR	Settled	5/23/2025	10.40%	9.50%
D-U-37345 (Entex)	Delta South Louisiana Gas Company, LLC	LA	Fully Litigated	4/25/2025	Not Provided	9.95%
D-U-37346 (Arkla)	Delta North Louisiana Gas Company, LLC	LA	Fully Litigated	4/25/2025	Not Provided	9.95%
C-9754	Columbia Gas of Maryland, Incorporated	MD	Fully Litigated	4/22/2025	11.05%	9.80%
D-G-01551A-23-0341	Southwest Gas Corporation	AZ	Settled	3/27/2025	9.65%	9.84%
C-24-G-0061	Orange and Rockland Utilities, Inc.	NY	Settled	3/20/2025	10.25%	9.75%
D-UG-240008	Cascade Natural Gas Corporation	WA	Settled	2/24/2025	10.50%	9.50%

Docket Number	Utility Name	State	Decision Type	Rate Case Completion Date	Requested ROE	Authorized ROE
D-G-002/GR-23-413	Northern States Power Company	MN	Settled	2/13/2025	10.20%	9.60%
D-UG-240005	Puget Sound Energy, Inc.	WA	Fully Litigated	1/15/2025	10.50%	9.90%
D-G-9 Sub 837	Piedmont Natural Gas Company, Inc.	NC	Settled	1/7/2025	10.50%	9.80%
C-2024-00092	Columbia Gas of Kentucky, Incorporated	KY	Settled	12/30/2024	10.80%	9.75%
D-UG-240007	Avista Corporation	WA	Fully Litigated	12/20/2024	10.40%	9.80%
C-23-G-0627	National Fuel Gas Distribution Corporation	NY	Settled	12/19/2024	9.80%	9.70%
D-5-UR-111	Wisconsin Gas LLC	WI	Fully Litigated	12/19/2024	10.00%	9.80%
D-5-UR-111 (Gas)	Wisconsin Electric Power Company	WI	Fully Litigated	12/19/2024	10.00%	9.80%
D-6690-UR-128 (Gas)	Wisconsin Public Service Corporation	WI	Fully Litigated	12/19/2024	10.00%	9.80%
D-23-079-U	Summit Utilities Arkansas, Inc.	AR	Settled	11/21/2024	11.00%	9.85%
D-GR24010071	New Jersey Natural Gas Company	NJ	Settled	11/21/2024	10.42%	9.60%
D-GR24020158	Elizabethtown Gas Company	NJ	Settled	11/21/2024	10.75%	9.60%
D-23-11-02 (CNG)	Connecticut Natural Gas Corporation	CT	Fully Litigated	11/18/2024	10.20%	9.15%
D-23-11-02 (SCG)	The Southern Connecticut Gas Company	CT	Fully Litigated	11/18/2024	10.20%	9.15%
C-PU-23-341	MDU Resources Group, Inc.	ND	Settled	11/7/2024	10.50%	9.90%
C-PU-23-367	Northern States Power Company	ND	Settled	11/7/2024	10.20%	9.90%
C-U-21291	DTE Gas Company	MI	Fully Litigated	11/7/2024	10.25%	9.80%
Ca-46011	Ohio Valley Gas Inc	IN	Settled	11/6/2024	11.00%	10.00%
D-24-0043	Liberty Utilities (Midstates Natural Gas) Corp	IL	Fully Litigated	10/31/2024	10.80%	9.90%
D-24AL-0049G	Public Service Company of Colorado	CO	Fully Litigated	10/25/2024	10.10%	9.35%
D-GR23120925	Public Service Electric and Gas Company	NJ	Settled	10/9/2024	10.40%	9.60%
D-23-074-U	Black Hills Energy Arkansas, Inc.	AR	Settled	10/1/2024	10.50%	9.85%
C-U-21540	Michigan Gas Utilities Corporation	MI	Settled	9/26/2024	10.25%	9.86%
D-24-02027	Sierra Pacific Power Company	NV	Fully Litigated	9/18/2024	10.34%	9.45%
D-RPU-2023-0002 (gas)	Interstate Power and Light Company	IA	Settled	9/17/2024	10.00%	9.65%
C-23-G-0225	The Brooklyn Union Gas Company	NY	Settled	8/15/2024	9.80%	9.35%
C-23-G-0226	KeySpan Gas East Corporation	NY	Settled	8/15/2024	9.80%	9.35%
C-23-00255-UT	New Mexico Gas Company, Inc.	NM	Settled	7/25/2024	10.50%	9.38%
D-OSS-23-00015513 (Texas Cons	CenterPoint Energy Resources Corp.	TX	Settled	6/26/2024	10.50%	9.80%
D-U-36658	Atmos Energy Corporation	LA	Settled	5/13/2024	Not Provided	9.80%
C-23-0154-GA-AIR	Northeast Ohio Natural Gas Corp.	OH	Settled	4/17/2024	10.90%	9.75%
D-23-09012 (Northern)	Southwest Gas Corporation	NV	Settled	4/8/2024	10.00%	9.50%
D-U-22-081	ENSTAR Natural Gas Company	AK	Fully Litigated	4/8/2024	12.95%	11.88%
D-23AL-0231G	Black Hills Colorado Gas, Inc.	CO	Settled	3/24/2024	10.49%	9.30%
D-30026-78-GR-23	Black Hills Wyoming Gas, LLC	WY	Settled	1/17/2024	10.49%	9.85%
C-9692 (GAS)	Baltimore Gas and Electric Company	MD	Fully Litigated	12/14/2023	10.40%	9.45%
C-9704	Washington Gas Light Company	MD	Fully Litigated	12/14/2023	10.75%	9.50%
D-23-0068	North Shore Gas Company	IL	Fully Litigated	11/16/2023	9.90%	9.38%
D-23-0069	The Peoples Gas Light and Coke Company	IL	Fully Litigated	11/16/2023	9.90%	9.38%

Docket Number	Utility Name	State	Decision Type	Rate Case Completion Date	Requested ROE	Authorized ROE
D-30010-215-GR-23	Questar Gas Company	WY	Settled	11/7/2023	10.30%	9.65%
C-22-0507-GA-AIR	Duke Energy Ohio, Inc.	OH	Settled	11/1/2023	10.30%	9.60%
D-G-011/GR-22-504	Minnesota Energy Resources Corporation	MN	Settled	10/26/2023	10.30%	9.65%
D-UD-18-07 (Gas extension)	Delta New Orleans Gas Company, LLC	LA	Fully Litigated	10/19/2023	Not Provided	9.35%
C-22-G-0318	New York State Electric & Gas Corporation	NY	Settled	10/12/2023	10.20%	9.20%
C-22-G-0320	Rochester Gas and Electric Corporation	NY	Settled	10/12/2023	10.20%	9.20%
D-2023-7-G	Piedmont Natural Gas Company, Inc.	SC	Settled	10/5/2023	9.30%	9.30%
D-2023-00051	Northern Utilities, Inc.	ME	Settled	9/20/2023	10.35%	9.35%
D-2023-70-G	Dominion Energy South Carolina, Inc.	SC	Settled	9/20/2023	10.38%	9.49%
D-22AL-0348G	Atmos Energy Corporation	CO	Settled	5/4/2023	10.95%	9.30%
20220069-GU	Pivotal Utility Holdings, Inc.	FL	Fully Litigated	3/28/2023	10.75%	9.50%
D-U-36338	Delta Capital Gas Company, LLC	LA	Settled	3/15/2023	Not Provided	9.80%
C-21-0637-GA-AIR	Columbia Gas of Ohio, Inc.	OH	Settled	1/26/2023	10.95%	9.60%
D-20220067-GU	Florida Public Utilities Company	FL	Fully Litigated	1/24/2023	11.25%	10.25%
D-GR22040253	South Jersey Gas Company	NJ	Settled	12/21/2022	10.75%	9.60%
DPU 22-20	The Berkshire Gas Company	MA	Settled	10/27/2022	10.50%	9.70%
D-18328 (2022)	Spire Alabama Inc.	AL	Settled	9/30/2022	Not Provided	9.70%
D-DG-21-104	Northern Utilities, Inc.	NH	Settled	7/20/2022	10.30%	9.30%
				Mean	10.47%	9.66%
				Median	**10.41%**	**9.65%**

Filters:
Case Type: Distribution (no limited issue rider cases)
Most Recently Completed: Yes
Rate Case Completion Date: => 2022
Authorized ROE: Removed all NA's

EXHIBIT JBF-7

Revenue Increase by Customer Class at the
OSBA's Adjusted Revenue Requirement

OSBA
Distribution of Revenue Increase by Customer Class

				NFG Revenue Allocation at NFG CCOSS and NFG Revenue Requirement				NFG Revenue Allocation at NFG CCOSS and OSBA Revenue Requirement				
	Current Base Rate Revenues	Gas Revenues	Current Total Revenues	Base Rate Increase	% Base Rate Increase based on National Fuel Request	Total Base Revenue	Class Base Revenue Relative to System Base Revenue	Total Base Revenue	Class Base Revenue Relative to System Base Revenue	Base Rate Increase	% Base Rate Increase based on OSBA Adjustments	Total Rate Increase
	(a)	(b)	(c) = (a) + (b)	(d)	(e) = (d) ÷ (a)	(f) = (a) + (d)	(g) = (f) ÷ NFG RR	(h) = (i) x OSBA RR	(i) = (g)	(j) = (h) - (a)	(k) = (j) ÷ (a)	(l) = (j) ÷ (c)
Residential	$ 97,367,043	$100,820,125	$198,187,168	$ 15,403,535	15.8%	$112,770,578	70.20%	$ 106,596,049	70.20%	$ 9,229,006	9.5%	4.7%
Total Residential	97,367,043	100,820,125	198,187,168	15,403,535	15.8%	112,770,578	70.20%	106,596,049	70.20%	9,229,006	9.5%	4.7%
SCPA<250	6,819,476	6,009,785	12,829,261	882,692	12.9%	7,702,168	4.79%	7,280,451	4.79%	460,975	6.8%	3.6%
SCPA>250	6,988,813	7,789,941	14,778,754	904,611	12.9%	7,893,424	4.91%	7,461,235	4.91%	472,422	6.8%	3.2%
LCPA	13,907,541	6,609,463	20,517,004	1,341,863	9.6%	15,249,405	9.49%	14,414,454	9.49%	506,912	3.6%	2.5%
NGV	131,245	397,954	529,199	20,763	15.8%	152,008	0.09%	143,685	0.09%	12,440	9.5%	2.4%
SVIS	443,729	363,570	807,299	42,813	9.6%	486,542	0.30%	459,903	0.30%	16,173	3.6%	2.0%
IVIS	5,876,219	2,174,873	8,051,092	566,965	9.6%	6,443,184	4.01%	6,090,400	4.01%	214,181	3.6%	2.7%
LVIS	2,730,253	229,318	2,959,571	263,427	9.6%	2,993,681	1.86%	2,829,768	1.86%	99,514	3.6%	3.4%
LIS	2,470,353	175,553	2,645,906	238,351	9.6%	2,708,704	1.69%	2,560,395	1.69%	90,041	3.6%	3.4%
LIS Negotiated	2,945,197	0	2,945,197	(68,334)	-2.3%	2,876,862	1.79%	2,719,346	1.79%	(225,851)	-7.7%	-7.7%
Total Commercial and Industria	42,312,827	23,750,457	66,063,284	4,193,151	9.9%	46,505,978	28.95%	43,959,635	28.95%	1,646,808	3.9%	2.5%
Other Operating Revenue	1,273,368	-	1,273,368	83,817	6.6%	1,357,185	0.84%	1,282,875	0.84%	9,507	0.7%	0.7%
Total Pennsylvania Retail	**$140,953,238**	**$124,570,582**	**$265,523,820**	**$ 19,680,503**	**14.0%**	**$160,633,741**	**100.00%**	**$ 151,838,559**	**100.00%**	**$ 10,885,321**	**7.7%**	**4.1%**

NFG Proposed Revenue Increase by Class in Application

	Average Customers	Excluding Gas Costs: Current Revenue	Excluding Gas Costs: $ Increase Requested	Excluding Gas Costs: Percent Change	Including Gas Costs: Delivery Revenue	Including Gas Costs: Fuel Revenue	Including Gas Costs: Total Revenue	Including Gas Costs: $ Increase Requested	Including Gas Costs: Percent Change	Ave $ Increase per Customer
Residential	197,825	$ 97,367,043	$ 15,403,535	15.8%	$ 97,367,043	$ 100,820,125	$ 198,187,168	$ 15,403,535	7.8%	$ 77.86
SCPA < 250	10,491	$ 6,819,476	$ 882,692	12.9%	$ 6,819,476	$ 6,009,785	$ 12,829,261	$ 882,692	6.9%	$ 84.14
SCPA > 250	4,453	$ 6,988,813	$ 904,611	12.9%	$ 6,988,813	$ 7,789,941	$ 14,778,754	$ 904,611	6.1%	$ 203.15
LCPA	1,535	$ 13,907,541	$ 1,341,863	9.6%	$ 13,907,541	$ 6,609,463	$ 20,517,004	$ 1,341,863	6.5%	$ 874.23
NGV	7	$ 131,245	$ 20,763	15.8%	$ 131,245	$ 397,954	$ 529,199	$ 20,763	3.9%	$ 2,966.14
SVIS	202	$ 443,729	$ 42,813	9.6%	$ 443,729	$ 363,570	$ 807,299	$ 42,813	5.3%	$ 211.68
IVIS	352	$ 5,876,219	$ 566,965	9.6%	$ 5,876,219	$ 2,174,873	$ 8,051,092	$ 566,965	7.0%	$ 1,609.93
LVIS	26	$ 2,730,253	$ 263,427	9.6%	$ 2,730,253	$ 229,318	$ 2,959,571	$ 263,427	8.9%	$ 10,131.82
LIS	10	$ 2,470,353	$ 238,351	9.6%	$ 2,470,353	$ 175,553	$ 2,645,906	$ 238,351	9.0%	$ 23,835.10
LIS Negotiated	10	$ 2,945,197	$ (68,334)	-2.3%	$ 2,945,197	$ -	$ 2,945,197	$ (68,334)	-2.3%	$ (6,833.41)
Other Operating Revenue		$ 1,273,368	$ 83,817	6.6%	$ 1,273,368	$ -	$ 1,273,368	$ 83,817	6.6%	
Total		$ 140,953,238	$ 19,680,503	14.0%	$ 140,953,238	$ 124,570,582	$ 265,523,820	$ 19,680,503	7.4%	

Source: Revenue Exhibit E & CTM-1-9

EXHIBIT JBF-8

Rebate Information for National Fuel's Non-Residential Conservation Incentive Program in New York

National Fuel®

Non-Residential Conservation Incentive Program

The National Fuel Conservation Incentive Program offers WNY non-residential customers several money-saving rebates for replacing specified appliances with new, energy-efficient models.

Two Ways to Save with National Fuel:

1.	Fixed (Pre-Qualified) Rebate	Available on pre-qualified equipment. (See table below.)
2.	Customized (Performance-Based) Rebate	Determined case-by-case, based on the results of an energy-use analysis. Customized rebates are determined by multiplying the annual energy savings in Mcf by $15. This may result in a larger rebate compared with the fixed rebate.

Free Technical Assistance

As a courtesy to both our customers and contractors, National Fuel has partnered with C.J. Brown Energy to provide free technical assistance with the application process. Contact C.J. Brown Energy at 1-844-365-3493 or email NFRebateHelp@cjbrownenergy.com.

Pre-Qualified Rebates

Equipment Type	National Fuel Minimum Efficiency	Equipment Size (MBtu/h)	National Fuel Rebate
Space Heating Equipment			
Hot Air Furnace	≥ 95% AFU	≤ 300	$5.00/MBtu/h
Hot Water Boiler (Condensing)	≥ 90% AFUE ≥ 90% E_t ≥ 90% E_t ≥ 90% E_t ≥ 90% E_t	≤ 300 301–500 501–1,000 1,001–1,700 > 1,700	$1,000 $1,500 $2,500 $3,500 $4,500
Steam Boiler	≥ 82% AFUE ≥ 79% E_t ≥ 80% E_t	≤ 300 301–2,500 2,501–10,000	$2.00/MBtu/h $1.00/MBtu/h $1.00/MBtu/h
Warm Air Unit Heater	> 90% AFUE or E_t		$2.00/MBtu/h
Low-Intensity Infrared Heater	Any efficiency		$2.50/MBtu/h
Pipe Insulation	R-value ≥ 4. For existing gas-fired hot water or steam systems only.		$3.00/ft.
Duct Insulation	R-value ≥ 6. For existing uninsulated ductwork only.		$0.50/ft.
Demand Control Ventilation	N/A		$200/sensor
Furnace Tune-Up Service*	N/A		$125
Boiler Tune-Up Service*	N/A		$125
Water Heating Equipment			
Tankless Water Heater	0.87 UEF or 0.90 EF		$400
Other Gas Appliances			
Commercial Natural Gas Dryers	ENERGY STAR® qualified		$50
Controls			
Wi-Fi Thermostat	N/A		$100
Smart Thermostat	N/A		$200

*One tune-up service per furnace/boiler, per year.

Rebates only for equipment installed between October 1, 2025 and December 31, 2025.

Source: https://www.fuelingtomorrowtoday.com/non-residential-customers/rebate-information/

OSBA

WORKPAPERS

For

OSBA Statement No. 1

DIRECT TESTIMONY OF JUSTIN B. FARR

- OSBA - WP - JBF - National Fuel Exhibit A - FPFTY 10.31.27 MASTER***
- Exhibits JBF- 1 through 7 Final***

***** OSBA Workpapers are in excel format <u>ONLY</u>; therefore, will be served via electronic means <u>ONLY</u>, and will be served simultaneous to service of OSBA Statement No. 1, Direct Testimony of JUSTIN B. FARR <u>ONLY</u>*****

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	**Docket No. R-2025-3059428**
v.	:	
	:	
National Fuel Gas Distribution Corporation	:	
	:	

VERIFICATION

I, Justin B. Farr, hereby state that the facts set forth in my Direct Testimony and Exhibits, labelled OSBA Statement No. 1, and associated Exhibit JBF-1, Exhibit JBF-2, Exhibit JBF-3, Exhibit JBF-4, Exhibit JBF-5, Exhibit JBF-6, Exhibit JBF-7, and Exhibit JBF-8, are true and correct to the best of my knowledge, information, and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: April 15, 2026

Justin B. Farr

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	**Docket Nos. R-2025-3059428**
v.	:	**C-2026-3060354**
	:	
National Fuel Gas Distribution Corporation	:	
	:	

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Katrina L. Dunderdale
Administrative Law Judge
Pennsylvania Public Utility Commission
Piatt Place
301 Fifth Avenue, Suite 220
Pittsburgh, PA 15222
kdunderdal@pa.gov

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Bureau of Investigation & Enforcement
Commonwealth Keystone Building
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pulp@pautilitylawproject.org

Date: April 16, 2026

/s/ Rebecca Lyttle
Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

COMMONWEALTH OF PENNSYLVANIA

May 12, 2026

The Honorable Katrina L. Dunderdale
Administrative Law Judge
Pennsylvania Public Utility Commission
Piatt Place
301 Fifth Avenue, Suite 220
Pittsburgh, PA 15222

Re: Pennsylvania Public Utility Commission v. National Fuel Gas Distribution Corporation / Docket No. R-2025-3059428

Dear Judge Dunderdale:

Enclosed please find the Rebuttal Testimony of Justin B. Farr, labelled OSBA Statement No. 1-R, on behalf of the Office of Small Business Advocate ("OSBA"), in the above-referenced proceeding.

As evidenced by the enclosed Certificate of Service, all known parties will be served, as indicated.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

Enclosures
cc: PA PUC Secretary Matthew L. Homsher (Cover Letter & Certificate of Service only)
Justin B. Farr
Parties of Record

OSBA STATEMENT NO. 1-R

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	**:**	
	:	**Docket No. R-2025-3059428**
v.	**:**	
	:	
National Fuel Gas Distribution Corporation	**:**	
	:	

REBUTTAL TESTIMONY

of

JUSTIN B. FARR

on behalf

of

Pennsylvania Office of Small Business Advocate

Topics:

Class Cost of Service
Revenue Allocation

Date Served: May 12, 2026

Date Submitted for the Record: _____

REBUTTAL TESTIMONY OF JUSTIN B. FARR

INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Justin B. Farr. My business address is 111 East Broadway, Suite 1200, Salt Lake City, Utah, 84111.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am a Director in the firm of Energy Strategies, LLC. Energy Strategies is a private consulting firm specializing in economic and policy analysis applicable to energy production, transportation, and consumption.

Q. ARE YOU THE SAME JUSTIN B. FARR WHO PREFILED DIRECT TESTIMONY IN THIS DOCKET ON BEHALF OF THE PENNSYLVANIA OFFICE OF SMALL BUSINESS ADVOCATE ("OSBA")?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. My rebuttal testimony responds to the direct testimony of Bureau of Investigation and Enforcement ("I&E") and Office of Consumer Advocate ("OCA") witnesses on the topics of class cost allocation and revenue allocation.

Q. PLEASE SUMMARIZE THE CONCLUSIONS AND RECOMMENDATIONS IN YOUR REBUTTAL TESTIMONY.

A. In my rebuttal testimony:

(1) I disagree with the recommendations of I&E witness Mr. Ethan Cline and OCA witness Mr. Michael Deupree to use the Peak and Average method to

allocate distribution mains, without any consideration of customer-related costs. In the alternative, I recommend a hybrid approach, which assigns 50% of the weight to customer-related costs that are otherwise derived from National Fuel's zero-intercept analysis (i.e., 50% x 61% = 30.5%) with the remaining allocation (69.5%) determined using the alternative Peak and Average method proposed by OCA. I also provide a revised class revenue allocation based on this hybrid approach.

Q. DO YOU CONTINUE TO SUPPORT THE REVENUE REQUIREMENT ADJUSTMENTS PROPOSED IN YOUR DIRECT TESTIMONY?

A. Yes, I continue to support my recommendations concerning adjustments to salaries & wages and stock-based compensation tied to financial performance and denying the 25-basis point Management Premium as explained in my direct testimony. I note that the "proxy" ROE presented in my direct testimony is in between OCA's recommended 9.74% (assuming 50/50 debt/equity split) and I&E's 9.81% (assuming 45/55 debt/equity split). I also continue to support my recommendation that National Fuel adopt a non-residential energy efficiency program.

CLASS COST OF SERVICE AND REVENUE ALLOCATION

Q. IN YOUR DIRECT TESTIMONY, YOU SUPPORTED THE CLASS COST OF SERVICE METHOD PROPOSED BY NATIONAL FUEL AS BEING CONSISTENT WITH THE PRINCIPLES OF COST CAUSATION. DID OTHER PARTIES DISAGREE WITH NATIONAL FUEL'S APPROACH?

A. Yes. I&E witness Mr. Ethan Cline and OCA witness Mr. Michael Deupree both disagree with the Company's classification and allocation of costs associated with distribution mains and instead favor the Peak and Average method. Mr. Cline supports the Seaboard variant of the Peak and Average method which utilizes a 50-50 weighting of the demand and volumetric components, while Mr. Deupree recommends a variant based on the Company's system load factor. Neither variant favored by these witnesses considers customer-related costs. Mr. Cline points to Commission precedent that was reaffirmed in the recent Columbia Gas order.[1] Mr. Deupree cites academic literature describing methodologies for classifying cost of an electric distribution utility in support of his position.[2]

Q. HOW DO YOU RESPOND TO THESE OBJECTIONS?

A. While I continue to believe that National Fuel's use of the zero-intercept method to allocate distribution mains reasonably reflects cost causation, I recognize that the Commission has not always supported this approach, as highlighted by Mr. Cline. Given the differing positions among the parties on this issue, I am offering a hybrid alternative proposal that is a "middle ground" for the Commission's consideration in this proceeding.

Q. PLEASE DESCRIBE THE HYBRID ALTERNATIVE APPROACH YOU ARE PROPOSING.

A. The zero-intercept approach proposed by National Fuel classifies 61% of its investment in distribution mains as customer-related and 39% of its investment as

[1] Direct Testimony of Ethan H. Cline, p. 9, line 13 – p. 10, line 23.
[2] Direct Testimony of Michael Deupree, p. 55, line 3 – p. 57, line 9.

demand-related.[3] In contrast, the Seaboard method advocated by I&E allocates distribution mains using a 50% weighting of peak contribution by class and a 50% weighting of annual throughput while the variant advocated by OCA weights annual throughput based on the test year system load factor of 26.13% and allocates the remaining 78.87% to peak demand.

The options being considered are significantly different from one another. National Fuel's proposal assigns substantial weight to customer-related costs based on the results of its zero-intercept analysis. By contrast, the Seaboard method supported by I&E and the alternative variant proposed by OCA assign *absolutely no weight* to customer-related costs in the classification and allocation of distribution mains. My proposed hybrid approach represents a middle ground between National Fuel's proposal and OCA's proposal by assigning 50% weight to the customer-related costs derived from the zero-intercept analysis (i.e., 50% × 61% = 30.5%), while allocating the remaining 69.5% using the OCA's alternative method. The results of this hybrid approach are summarized in Table JBF-1-R, below.

[3] Direct Testimony of John D. Taylor, p. 12, lines 7-11

Table JBF-1-R
Cost-of-Service Study Results Using OSBA Hybrid Approach
At National Fuel's Direct Requested Revenue Requirement ($000)

Rate Class	Current Margin Revenue	Current Parity Ratio	At Equalized Rate of Return			
			Total Margin Revenue	Margin Revenue $ Change	Margin Revenue % Change	Resulting Parity Ratio
Residential	$97,367	0.94	$118,654	$21,287	21.86%	1.00
SCPA-LL	$6,819	1.10	$7,068	$248	3.64%	1.00
SCPA-UL	$6,989	1.00	$8,001	$1,012	14.48%	1.00
LCPA	$13,908	1.33	$11,891	-$2,016	-14.50%	1.00
NGV	$131	0.63	$244	$113	86.01%	1.00
SVIS	$444	1.44	$350	-$93	-21.05%	1.00
IVIS	$5,876	1.33	$5,007	-$869	-14.79%	1.00
LVIS	$2,730	1.39	$2,226	-$504	-18.46%	1.00
LIS	$2,470	0.95	$2,958	$488	19.74%	1.00
Total System	$136,735	1.00	$156,400	$19,665	14.38%	1.00

Q. WHY DO YOU BELIEVE THE HYBRID APPROACH YOU ARE PROPOSING IS REASONABLE FOR THE PURPOSES OF THIS CASE?

A. Distribution mains are constructed for the dual purpose of meeting design day demand and providing service access to customer premises. Although the Peak and Average method recognizes class cost responsibility based on design day demand, it fails to account for the fundamental reality that the gas distribution system exists to deliver service to customer locations regardless of their individual demand levels. Design day demand certainly affects the diameter of mains installed and, therefore, the incremental cost associated with providing greater delivery capacity. However, the existence and geographic extent of the distribution system itself are

driven by the number and dispersion of customers the utility must serve. This is a straightforward matter of cost causation.

National Fuel's proposed zero-intercept method attempts to distinguish, through regression analysis, the portion of distribution main investment attributable to serving customers independent of their peak day demand. Reasonable parties may disagree regarding the appropriate weighting assigned to the customer-related component. However, assigning a weighting of zero to customer-related costs is difficult to justify.

Assigning at least some portion of distribution main costs to the customer classification is necessary to preserve a reasonable connection to cost causation principles. Although my proposal reduces the customer-related weighting by half, and therefore understates the customer component reflected in the zero-intercept analysis, I offer it as a good-faith compromise intended to establish a reasonable middle ground for purposes of this proceeding.

Q. YOUR MIDDLE GROUND APPROACH INCORPORATES OCA'S PROPOSED PEAK AND AVERAGE METHOD FOR 69.5% OF THE WEIGHTING. AS A GENERAL PROPOSITION, DO YOU BELIEVE THE ALLOCATION PROPOSED BY OCA IS A REASONABLE VARIANT OF THE PEAK AND AVERAGE METHOD?

A. Yes. Generally, if the Peak and Average method is used, I believe it should adhere to the parameters articulated in the Gas Distribution Rate Design Manual ("NARUC Manual") published by the National Association of Regulatory Utility Commissioners. As prescribed in the NARUC Manual, in using the Peak and

Average method, the weighting assigned to the average, or throughput component, should be set equal to the system load factor.[4] This is because the throughput component is intended to allocate costs that are associated with base-load-type usage, and system load factor is a generally-accepted standard for measuring the portion of facilities associated with the provision of base load service. In the case of National Fuel, the system load factor is 26.13%,[5] which is significantly less than the 50% weighting assigned to throughput by the Seaboard method preferred by I&E.

Q. IN YOUR DIRECT TESTIMONY, YOU SUPPORTED THE REVENUE ALLOCATION PROPOSED BY NATIONAL FUEL. WHAT REVENUE ALLOCATION ARE YOU PROPOSING IN CONCERT WITH YOUR MIDDLE GROUND PROPOSAL ON COST ALLOCATION?

A. My revised revenue allocation (at National Fuel's requested revenue requirement) is presented in Table JBF-2-R, below. I recommend the following:

- Classes with a parity ratio modestly lower than 1.0 receive an increase that is 1.05 times the system average (excluding fuel)
- Classes with a parity ratio at or modestly above 1.0 would receive increases that are 95% of the system average (excluding fuel)
- Classes with a parity ratio significantly greater than 1.0 would receive increases that are 85% of the system average (excluding fuel)

[4] In its discussion of this method in the NARUC Manual (June 1989), pp. 27-28, it specifies that the system's load factor is used to determine the capacity costs associated with average use and apportioned to classes on an annual volumetric basis.

[5] Derived from Attachment OCA I-3_St19_Exhibit D_ACOSS Sch2 (Formula for System Load Factor = Total Weather Normalized Volumes / (Peak Design Day 62DD * 365) or 38,211,546 / (400,571 * 365) = 26.13%)

- Cap the maximum increase at 1.5 times the system average (excluding fuel)

The results of my recommended revenue apportionment are contained in Table JBF-2-R below:

Table JBF-2-R
OSBA Revised Recommended Revenue Apportionment
Based on OSBA Hybrid COSS
At National Fuel's Direct Requested Revenue Requirement ($000)

			OSBA Recommended Revenue Apportionment				
Rate Class	Current Margin Revenue	Current Parity Ratio	Total Margin Revenue	Margin Revenue $ Change	Margin Revenue % Change	Multiple of System Increase	Resulting Parity Ratio
Residential	$97,367	0.94	$112,070	$14,703	15.10%	1.05	0.95
SCPA-LL	$6,819	1.10	$7,646	$827	12.12%	0.84	1.08
SCPA-UL	$6,989	1.00	$7,944	$955	13.66%	0.95	0.99
LCPA	$13,908	1.33	$15,593	$1,686	12.12%	0.84	1.31
NGV	$131	0.63	$156	$25	18.70%	1.30	0.65
SVIS	$444	1.44	$498	$54	12.12%	0.84	1.41
IVIS	$5,876	1.33	$6,588	$712	12.12%	0.84	1.31
LVIS	$2,730	1.39	$3,061	$331	12.12%	0.84	1.37
LIS	$2,470	0.95	$2,843	$373	15.10%	1.05	0.96
Total System	$136,735	1.00	$156,400	$19,665	14.38%	1.00	1.00

Q. HOW SHOULD YOUR RECOMMENDED REVENUE ALLOCATION BE SCALED BACK IN CONJUNCTION WITH A LOWER OVERALL REVENUE REQUIREMENT AS PART OF A COMMISSION FINAL ORDER IN THIS CASE?

A. With a lower overall revenue requirement, each class's total margin revenue should be scaled back such that its total margin revenue remains in the same proportion to the total system margin revenue as shown in Table JBF-2-R above.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes, it does.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	**:**	
	:	**Docket No. R-2025-3059428**
v.	**:**	
	:	
National Fuel Gas Distribution Corporation	**:**	
	:	

VERIFICATION

I, Justin B. Farr, hereby state that the facts set forth in my Rebuttal Testimony, labelled OSBA Statement No. 1-R, are true and correct to the best of my knowledge, information, and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 7, 2026

Justin B. Farr

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	**Docket Nos. R-2025-3059428**
v.	:	**C-2026-3060354**
	:	
National Fuel Gas Distribution Corporation	:	

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Katrina L. Dunderdale
Administrative Law Judge
Pennsylvania Public Utility Commission
Piatt Place
301 Fifth Avenue, Suite 220
Pittsburgh, PA 15222
kdunderdal@pa.gov

Scott B. Granger, Esquire
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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. R-2025-3059428, et al.
	:	
National Fuel Gas Distribution Corporation	:	

DIRECT TESTIMONY OF HARRY S. GELLER, ESQ.

ON BEHALF OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND

ENERGY EFFICIENCY IN PENNSYLVANIA ("CAUSE-PA")

April 16, 2026

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PREPARED DIRECT TESTIMONY OF HARRY S. GELLER, ESQ.

I. INTRODUCTION

Q: Please state your name, occupation, and business address.

A: My name is Harry S. Geller. I am a retired attorney. I am the former Executive Director of the Pennsylvania Utility Law Project (PULP). I continue to serve as a consultant to legal aid programs and their clients. I maintain an office at 118 Locust St., Harrisburg, PA 17101 for the purpose of providing consulting services and assistance to low income individuals and the organizations which represent them in utility and energy matters.

Q: Briefly outline your education and professional background.

A: I received my B.A. degree from Harpur College, State University of New York at Binghamton in 1966, and a J.D. degree from Washington College of Law, American University in 1969. Upon graduation from law school, I worked at several organizations dedicated to serving low income households. Beginning 1988, I served as the Executive Director of PULP, a statewide legal aid project dedicated to protecting the rights of low income utility customers. At PULP, I represented low income individuals to resolve issues impacting their ability to maintain energy and utility services to their homes and supported organizations advocating for improved utility access and affordability. I also consulted and co-counseled on a wide variety of individual utility consumer cases, and participated in multiple task forces, work groups and advisory panels, including serving as Chair of the Department of Human Services' Low Income Home Energy Assistance Program (LIHEAP) Advisory Committee and the Pennsylvania Public Utility Commission's Consumer Advisory Committee. I frequently trained communities, legal aid staff, and advocacy groups across Pennsylvania on a range of utility and energy matters affecting Pennsylvania's low income population. I retired from PULP on June 30, 2015. Since that time, I

have continued to provide consulting services for PULP and its clients, as well as other organizations serving the low income community. In sum, I have over 50 years' experience working on behalf of households in poverty, including the past 38 years focusing specifically on utility and energy issues affecting low income consumers. My resume is attached as Appendix A.

Q: Please describe the focus of your work over the past fifty years, including relevant work experience on issues of low income families' ability to afford essential services such as utilities?

A: Through the entirety of my career, I have represented low income individuals and organizations serving low income populations in a wide variety of legal matters, including family law, public benefits, unemployment compensation, utility shut-offs, debtor/creditor, and housing-related disputes. Over the past 38 years, my focus has been to ensure that low income households can connect to, afford, and maintain utility and energy services.

In all these legal matters, I worked almost exclusively on behalf of individuals and households that subsist on incomes at or below 150% of the Federal Poverty Level (FPL). Through this work, I have had a close view of the daily lives of countless of our poorest citizens. I have spent thousands of hours assisting clients, combing through their budgets to see whether it is even possible to make ends meet. Over the years, I have consistently seen the near total absence of the ability of low income families to afford the most basic monthly necessities with the incomes they have, even assuming heroic self-control and conscientious budgeting and spending. Every month, my clients faced the stark reality of having to choose which bills they can forgo with the least drastic consequences.

Q: Have you served as an expert witness in any proceeding before the Pennsylvania Public Utility Commission?

A: Yes. I have served as an expert witness in many proceedings before the Pennsylvania Public Utility Commission (PUC or the Commission). A complete list of the PUC proceedings in which I testified as an expert witness in the past ten years is included in my resume, which is attached as Appendix A.

Q: For whom are you testifying in this proceeding?

A: I am testifying on behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA).

Q: What is the purpose of your testimony?

A: CAUSE-PA intervened in this proceeding to ensure that the proposed rate increase, rate design, and tariff changes, if approved by the PUC, will not further negatively affect and exacerbate energy insecurity for low income families in National Fuel Gas Distribution Corporation's (NFG or the Company) service territory, who are already struggling to connect to, maintain, and afford essential gas service necessary for heating, cooking, and maintaining a safe and healthy home.

Thus, the purpose of my testimony is to assess NFG's existing and proposed rates, tariff, rules, procedures, and programs to determine whether they are just, reasonable, and appropriately designed to ensure that low income Pennsylvanians within NFG's service territory are able to equitably access and maintain safe and affordable utility services.

II. RATE INCREASE PROPOSAL

Q: Please summarize NFG's requested rate increase as it applies to residential customers.

A: On January 28, 2026, NFG submitted a filing to the Commission requesting a rate increase of approximately $19.7 million per year, or 7.4% over existing revenues.[1] In addition to this rate increase, NFG proposes to recover approximately $0.7 million annually from residential ratepayers through a separate rider to fund its proposed Energy Efficiency pilot program (EE Pilot).[2] NFG also proposes to continue Rider I, scheduled to end in September 2026, which would give customers a one year surcredit totaling approximately $6.2 million to return ratepayer dollars that were previously collected to provide Other Post-Employment Benefits (OPEB) to employees.[3]

If the Commission were to approve this rate increase request in its entirety, the monthly bill for a residential customer using 80 Ccf of gas would increase from $83.49 to $88.44, or by 5.9%, but only until the OPEB surcredit ends one year after the rate increase would take effect.[4] After the OPEB surcredit ends, the monthly bill for the same residential customer using 80 Ccf of gas would increase further to $90.28 per month, or by 8.1% over existing rates.[5] Notwithstanding the short-term OPEB credit to return ratepayers' money to them, NFG's proposal should be understood as a proposal to increase the bill of a residential customer using 80 Ccf of gas by 8.1% – that is, by $6.79 per month or $81.48 per year.

NFG proposes to recover a major portion of its proposed revenue increase through a substantial increase in its fixed monthly residential service charge – from $14 per month to $19

[1] NFG St. 1 at 5:23-24; See also Rate Filing Cover Letter.
[2] NFG St. 1 at 6:1-6.
[3] NFG St. 14 at 13:19-20, 14:2-9; NFG St. 5 at 7:3-7.
[4] NFG St. 1 at 10, Table 1; See also Rate Filing Cover Letter.
[5] Affidavit of Donald Koch, Bill Inserts, at 1 (filed Mar. 24, 2026).

per month, or by 35.7%.[6] This massive proposed increase to the fixed monthly charge means that households using the least amount of gas will face the highest percentage increase in their monthly gas bills.[7] NFG also proposes to make its pilot Weather Normalization Adjustment (WNA) a permanent part of its rate structure.[8] As I will discuss, NFG's proposed rate design features, including its high fixed service charge and WNA, would impair the ability of NFG's low income customers to afford their monthly bills and undermine bill savings otherwise achievable through adopting energy efficiency and conservation measures.

Q: Do you support NFG's requested rate increase?

A: No. NFG's requested rate increase is neither just nor reasonable and is not in the public interest. NFG's current rates are already unaffordable for low income families – making access to continued service inaccessible to thousands of households, creating a cascade of consequences for those households and the surrounding communities that NFG serves.

As I will discuss in detail, it would be unjust, unreasonable, and contrary to the public interest to approve any rate increase in this matter, without first requiring adoption of substantial additional reforms to NFG's policies, procedures, and terms and conditions of services to address existing rate unaffordability for NFG's low income customers, and to fully remediate the increased unaffordability which would be created by NFG's proposal to substantially increase its rates.

Throughout my direct testimony, I offer recommendations for how NFG can adjust its policies, procedures, programs, rates, and services so that low income customers are better able to maintain access to gas service in their homes. These recommendations are critical to address

[6] NFG St. 14 at 17, Table 1.
[7] NFG St. 14 at 18:22-23. "Customers that use less gas each month will see slightly higher bill impacts than average-use or high-use customers."
[8] NFG St. 19 at 23:6-10.

energy insecurity at existing rates and become even more vital to mitigate additional financial harm for economically vulnerable consumers if the Commission allows NFG to increase its basic rates for gas service.

III. IMPACT OF RATE INCREASE ON LOW INCOME HOUSEHOLDS

a. NFG Low Income Customer Count

Q: What level of income qualifies a household as "low income"?

A: The Commission considers a "low income customer" to be any residential customer with income at or below 150% of the federal poverty level (FPL).[9] With some exceptions, most utility assistance programs – including NFG's Customer Assistance Program (CAP) and Pennsylvania LIHEAP – require households to have income that is not greater than 150% FPL to qualify for assistance.[10]

The FPL is a measure of poverty based exclusively on household size and income. It does not consider the relative difference in economic vulnerability based on the composition of the household (i.e. the age or health condition of household members) or variations in the cost of living based on geographic location. Table 1 provides a breakdown of the 2026 household income by FPL and household size:

[9] See 52 Pa. Code § 62.2 (Defining low-income customers for the purposes of NGDC Universal Service programs and reporting).
[10] See National Fuel Gas Distribution Corporation, 2022-2026 Universal Service and Energy Conservation Plan, Docket No. M-2021-3024935 at 23 (3rd Revised Plan Jan. 2, 2024) (hereinafter NFG USECP).

Table 1: 2026 Annual Income by Federal Poverty Level and Household Size[11]

Household/ Family Size	50%	100%	150%	200%	250%
1	$7,980	$15,960	$23,940	$31,920	$39,900
2	$10,820	$21,640	$32,460	$43,280	$54,100
3	$13,660	$27,320	$40,980	$54,640	$68,300
4	$16,500	$33,000	$49,500	$66,000	$82,500
5	$19,340	$38,680	$58,020	$77,360	$96,700

As a baseline, a family of four with household income at or below 150% FPL has a maximum gross annual income of $49,500 ($4,125 per month).[12] A household of four with income at or below 50% FPL has a maximum gross annual income of just $16,500 ($1,375).[13]

For illustrative purposes, a full-time (40 hours/week) worker making minimum wage ($7.25 per hour) has a gross annual income of $15,080, assuming no time off. This is substantially less than a household needs to meet their basic expenses in any of the counties that NFG serves.[14] This full-time minimum wage income level is relatively in line with the average $16,720 household income of NFG's 25,308 confirmed low income customers.[15] Notably, 14.7% of Erie County households, where a plurality of NFG's customers reside,[16] have income at or below 100% of the FPL, a markedly higher rate of households living below the poverty level than the 11.6% rate for

[11] U.S. Dept. of Health and Human Services, 2026 U.S. Federal Poverty Guidelines, available at: https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines.
[12] U.S. Dept. of Health and Human Services, 2026 U.S. Federal Poverty Guidelines, available at: https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines.
[13] U.S. Dept. of Health and Human Services, 2026 U.S. Federal Poverty Guidelines, available at: https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines.
[14] Self-Sufficiency Standard, available at: http://www.selfsufficiencystandard.org/Pennsylvania.
[15] NFG Response to CAUSE-PA 1-19*; NFG Revised Response to CAUSE-PA 1-5, Attachment - Revised (NFG reports it serves 25,308 CLI customers as of January 2026). Attached hereto at Appendix B. *CAUSE-PA's discovery requests were served with Arabic numeration. In its responses to some sets of CAUSE-PA's discovery requests, NFG transposed Roman numeration for the original Arabic numeration. Herein I consistently use Arabic numeration to identify NFG's responses to CAUSE-PA's discovery requests.
[16] NFG Response to CAUSE-PA 1-10, Attachment, "Total Active Residential Accounts by County." Attached hereto at Appendix B .

Pennsylvania and the 10.6% rate across the United States.[17] 30% of Erie County households have income at or below 150% FPL.[18]

While the Commission uses FPL in its definition of "low income customer," this definition is not truly reflective of the income level necessary to be able to meet basic needs. To assess the actual level of economic hardship across a given region, poverty experts often utilize the Self Sufficiency Standard. This Standard is a benchmark used to assess how much income a household needs to live without assistance. It measures the income that a family must earn to meet their basic needs and consists of the combined cost of six (6) basic needs – housing, child care, food, health care, transportation, and taxes – without the help of public subsidies.[19] Unlike the FPL, which does not change based on geographic location or family composition, the Self-Sufficiency Standard accounts for the varied costs of the six basic needs in different geographic areas and for differently aged household members.[20]

Across the counties NFG serves, the average Self-Sufficiency Standard for a family with two adults and two school aged children is $76,166.50.[21] This is far above the maximum income ceiling to qualify for most energy assistance programs (150% FPL). In fact, a family of four at the maximum income that would qualify for NFG's CAP would need 154% of its current income – an additional $26,666.50 annually – simply to make ends meet each month without assistance.[22]

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[17] US Census Bureau, QuickFacts: Erie County, Pennsylvania, available at: https://www.census.gov/quickfacts/fact/table/eriecountypennsylvania#.
[18] NFG Response to CAUSE-PA 1-10, Attachment, "Estimate of the Number of National Fuel's Low Income Households." Attached hereto at Appendix B.
[19] See PathWays PA, Overlooked and Undercounted 2019 Brief: Struggling to Make Ends Meet in Pennsylvania, available at: http://www.selfsufficiencystandard.org/Pennsylvania.
[20] See PathWays PA, Overlooked and Undercounted 2019 Brief: Struggling to Make Ends Meet in Pennsylvania, available at: http://www.selfsufficiencystandard.org/Pennsylvania.
[21] See Sufficiency Standard – 2024 Pennsylvania Dataset, available at: https://selfsufficiencystandard.org/pennsylvania/.
[22] 150% of the FPL is $49,500 – this is the **maximum** income a household of four can have to qualify for NFG's CAP.

There is little to no chance that households at or below 150% of the poverty level can afford essential utility service without substantial levels of assistance.

Any increase in the cost of necessities, including the rates for basic gas service, will result in increased unaffordability for low income households living below the Self-Sufficiency Standard, and will ultimately result in a corresponding increase in uncollectible expenses and service terminations, requiring low income households to make unreasonable choices in terms of what essentials to forgo to make ends meet each and every month.

Q: How does NFG determine how many low income customers are in its service territory?

A: Like other large, regulated public utilities in Pennsylvania, NFG must track its low income customer population in two ways – estimated low income customers (ELI) and confirmed low income customers (CLI).[23] A utility's estimated low income customer count is derived from census data, scaled against residential customer counts in a given geographic area.[24] The Commission defines a "confirmed low income" customer as a residential customer for whom the utility "has obtained information that would reasonably place the customer in a low-income designation," including through receipt of LIHEAP funds or through self-certification.[25]

As of December 2025, NFG reports that it serves 57,542 ELI customers, representing 29.1% of the 197,608 residential customers it serves.[26] NFG's CLI count is limited to those customers that the Company has recorded as having income at or below 150% FPL, either through

[23] See Pa. PUC, BCS, 2024 Report on Universal Service Programs & Collections Performance (hereinafter 2024 Universal Service and Collections Report), at 5-7, available at: https://www.puc.pa.gov/media/3771/2024-universal-service-report-final.pdf .
[24] 2024 Universal Service and Collections Report at 7.
[25] 52 Pa Code § 62.2; 2024 Universal Service and Collections Report at 2.
[26] NFG Response to CAUSE-PA 1-10, Attachment, "Estimate of the Number of National Fuel's Low Income Households."

verbal confirmation of household makeup and income or through a customer's receipt of a LIHEAP grant.[27] NFG reports that it has confirmed that 24,901 of its residential customers have low income, representing 12.6% of the residential customers it serves and just 43.3% of the residential customers in NFG's service territory who are estimated to have low income.[28]

By either measure, a substantial number of NFG's customers have income that is at or below 150% FPL. That said, I note that the ELI customer count presents a more holistic picture of the total number of households that are likely income eligible for rate assistance in NFG's service territory. The CLI count provides a limited and incomplete picture of NFG's low income customer population. For purposes of evaluating the impact and reasonableness of NFG's rates and terms and conditions of service – including the adequacy of its universal service programs – it is more accurate to use the census-based ELI customer count, rather than relying on a population subset– the number of CLI households that have already applied for energy assistance or otherwise provided income information to the Company.

Q: Do you have any concerns about NFG's identification and classification of its CLI customers?

A: Yes. I am concerned that NFG does not appear to have a procedure for proactively identifying and classifying its low income customers as CLI which has resulted in the Company undercounting its CLI customer population. As mentioned above, NFG has confirmed the low income status of fewer than half of its customers who are estimated to have low income.[29] NFG reports that it does not screen customers or applicants for low income status at the time they start

[27] NFG Response to CAUSE-PA 1-4; NFG Response to OCA IV-19. Both attached hereto at Appendix B.
[28] NFG Revised Response to CAUSE-PA 1-5, Attachment – Revised; NFG Response to CAUSE-PA 1-10, Attachment, "Estimate of the Number of National Fuel's Low Income Households"
[29] NFG Revised Response to CAUSE-PA 1-5, Attachment – Revised; NFG Response to CAUSE-PA 1-10, Attachment, "Estimate of the Number of National Fuel's Low Income Households" Attached hereto at Appendix B.

or move service.[30] Instead, NFG only updates customer income information reactively – such as after a customer received a termination notice, contacted the Company in need of assistance with paying a past due bill, or when the Company received a LIHEAP grant on the customer's account.[31]

Without a more precise count of NFG's low income customer population, it is difficult for the Company to evaluate the true impact of its requested rate increase on its low income customer base and the appropriate actions needed to mitigate the proposed changes to its rates, programs, and associated terms and conditions of service. An inclusive and accurate count of low income customers is also essential to determining the adequacy and accessibility of NFG's universal service programs, inclusive of the policies and procedures regarding income-based consumer protections, such as the winter moratorium and the prohibition on security deposits.[32]

As I will discuss later in my testimony, NFG's assistance programs are reaching only a small percentage of *confirmed* low income customers – which necessarily means that it is reaching an even smaller percentage of the actual low income households within its service territory. It is imperative that increased efforts are made to routinely and proactively screen customers for low income status and connect these customers with assistance before payment difficulties occur. Improving identification of NFG's low income customers – and matching these customers with available assistance – is essential to providing just and reasonable rates and services, as well as ensuring that all consumers, including CAP-eligible consumers, can access the most advantageous available rate.[33] Proactive identification of low income customers so that these customers can be connected to available services and protections also serves as a critical collections and cost

[30] NFG Response to CAUSE-PA 5-16. Attached hereto at Appendix B.
[31] NFG Response to CAUSE-PA 5-16; NFG Response to CAUSE-PA 1-4. Attached hereto at Appendix B.
[32] 52 Pa. Code § § 56.32(e), 56.100; 66 Pa. C.S. § 2802 (defining universal service and energy conservation to include the programs, policies, and procedures that assist low income customers to maintain service to their home.)
[33] 66 Pa. C.S. § 1303.

containment tool – helping to reduce the accrual of unmanageable debts, reduce uncollectible expenses and other collections costs, and reduce the cost of the CAP arrearage management program.

Q: Do you have any recommendations for how NFG could improve its ability to identify and serve its low income customer base?

A: Yes. To help further improve identification of confirmed low income customers and enhance services to its low income customer base, I recommend that NFG begin screening all new and moving customers for income level at the time their service is established. For existing customers, NFG should routinely screen for income on any non-emergency calls, and/or should inquire whether there has been any update to the income information already noted in their account. When establishing an account, and once annually thereafter, all customers should be informed of the availability of low income programs and requested to voluntarily self-disclose any changes to their income information. All customers identified as low income through this process should be referred for enrollment in NFG's universal service programs. Consumers should be able to opt out of disclosing their income if they so choose but should first be informed that they may be eligible for a lower rate, debt forgiveness, or energy efficiency measures.

Improving the identification of low income customers and better matching them to critical rate assistance and usage reduction services is essential to improving NFG's ability to provide service at just and reasonable rates to low income households. This is particularly the case in light of the substantial increase in residential rates proposed by NFG in this case. It would also help improve the ability of NFG, the Commission, and stakeholders to assess NFG's customer service metrics – including its credit, collections, termination, reconnection, complaint, and universal

service data – to determine whether and to what extent its rates, policies, and programs are just and reasonable in appropriately serving the needs of its low income customers.

b. Impact of Proposed Rate Increase on Low Income Households

Q: How would NFG's proposed rate increase impact low income households?

A: If approved, NFG's proposed rate increase will have a severe and detrimental impact on low income families across its service territory. Low income families already struggle to make ends meet each month and are regularly forced to make untenable choices between affording utility services and other basic necessities – such as food, medicine, medical care, and housing. NFG's proposed rate increase would represent a substantial increase in a basic living expense that, if approved, will have a destabilizing impact on low income families.

To contextualize the impact of NFG's proposed rate increase on low income households, it is helpful to look at the relative energy burden of low income households compared to other Pennsylvanians. A household's energy burden is the percentage of household income required to pay for energy services.[34] According to formal Commission policy, to be considered affordable, a household's *combined* energy burden (electric and gas) should not exceed 6% of household income for those with incomes between 0-50% FPL, or 10% of household income for those with income between 51-150% FPL.[35] But across Pennsylvania, households with income at or below 150% FPL spend as much as 29% of their income on energy costs alone.[36] If a household's total housing costs – *including utility costs* – is more than 30% of a household's total income, the household is cost-

[34] 2019 Amendments to Policy Statement on Customer Assistance Program, 52 Pa. Code § 69.261-69.267, Final Policy Statement and Order, Docket No. M-2019-3012599, (Final Policy Statement entered Nov. 5, 2019) at 3.
[35] *Id*.; 2019 Amendments to Policy Statement on Customer Assistance Program, 52 Pa. Code § 69.261-69.267, Final Policy Statement and Order, Docket No. M-2019-3012599, (Final Policy Statement entered Nov. 5, 2019).
[36] See Fisher, Sheehan & Colton, The Home Energy Affordability Gap: Pennsylvania (April 2023).

burdened, according to the U.S. Department of Housing and Urban Development.[37] Pennsylvania households at or below 150% FPL reach the threshold of being cost-burdened *from their energy costs alone*.[38] By comparison, the Bureau of Consumer Services (BCS) estimates that the energy burden of Pennsylvania's residential customers as a whole (exclusive of those enrolled in a CAP) is roughly 4%.[39]

Energy insecurity resulting from high energy burdens impacts roughly 1 in 4 Pennsylvania households.[40] According to the United States Census Bureau's Household Pulse Survey, roughly 24.4% of Pennsylvania households were unable to afford their home energy bills in 2024, compared to 23% nationwide.[41] According to the Energy Information Administration (EIA) 2024 Residential Energy Consumption Survey (RECS), 32.9% of U.S. residents reported experiencing energy insecurity; 24.8% reported reducing or forgoing food or medicine to pay for energy costs; and 13.2% reported leaving their homes at unhealthy temperatures because they could not afford to pay for energy.[42] Energy insecurity is more pronounced for low income Black families. EIA's

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[37] U.S. Census Bureau, Nearly Half of Renter Households Are Cost-Burdened, Proportions Differ by Race, available at: https://www.census.gov/newsroom/press-releases/2024/renter-households-cost-burdened-race.html. *(last visited April 14, 2025).*

[38] See Fisher, Sheehan & Colton, The Home Energy Affordability Gap: Pennsylvania (April 2023).

[39] Energy Affordability for Low income Customers, Docket No. M-2017-2587711, Order, at 8 (Order, Jan. 17, 2019); see also Diana Hernandez, Energy Insecurity: A Framework for Understanding Energy, the Built Environment, and Health Among Vulnerable Populations in the Context of Climate Change, 103(4) Am. J. Pub. Health (2013) available at: http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3673265/#bib20.

[40] US Census Bureau, Household Pulse Survey: Pennsylvania, Unable to Pay Energy Bill (Aug. 20 – Sept. 16, 2024), available at: https://www.census.gov/data-tools/demo/hhp/#/?measures=ENERGYBILL&s_state=00042. Energy insecurity is the inability to adequately meet home energy needs. There are three dimensions to energy insecurity: economic (disproportionately high energy costs (burden) as percentage of income); physical (housing deficiencies / inefficiencies); and coping (strategies to cope with economic and physical hardships associated with energy insecurity). See Columbia Univ. Ctr. on Global Energy Policy, Energy Insecurity in the United States, https://www.energypolicy.columbia.edu/publications/energy-insecurity-in-the-united-states/.

[41] US Census Bureau, Household Pulse Survey: Pennsylvania, Unable to Pay Energy Bill (April 9-29 2024), available at: https://www.census.gov/data-tools/demo/hhp/#/?measures=ENERGYBILL&s_state=00042.

[42] United States Energy Information Administration, 2024 Residential Energy Consumptions Survey, Table HC11.1 Household energy insecurity, 2024 available at: https://www.eia.gov/consumption/residential/data/2024/hc/pdf/HC11.1_2024.pdf.

RECS data revealed that 55.1% of Black and African American households experience energy insecurity, compared to 29.4% of white households.[43] These disparities are driven in large part by inequities in housing quality and, in turn, home efficiency.

According to a recent study of the National Energy Assistance Directors Association and the Center for Energy Poverty and Climate, in February 2024, 51.9% of households with income under $50,000 reported at least one month where they reduced or went without food, medicine, and other basic needs in order to pay an energy bill.[44] In addition, 34% kept their home at a temperature that felt unsafe or unhealthy in order to save money on energy bills.[45] The data reviewed in the study found that, far and away, the greatest increase in energy insecurity was among households with children.[46]

NFG's proposed rate increase would substantially increase the portion of low income households' energy burdens attributable to their gas bills. The Table below uses data provided by NFG in response to discovery requests to analyze the bill burden impact for confirmed low income households, using 2025 average residential usage data. Using this same information, the last column shows the monthly percentage of income low income customers must allocate toward their gas bills at proposed rates.

[43] United States Energy Information Administration, 2024 Residential Energy Consumptions Survey, Table HC11.1 Household energy insecurity, 2024 available at: https://www.eia.gov/consumption/residential/data/2024/hc/pdf/HC11.1_2024.pdf.
[44] Nat'l Energy Assistance Dir. Assoc. (NEADA), Center for Energy Poverty & Climate, Energy Hardship Report, slide 10 (April 2024), available at: https://neada.org/wp-content/uploads/2024/04/neadahardshipreportAPR24.pdf.
[45] Nat'l Energy Assistance Dir. Assoc. (NEADA), Center for Energy Poverty & Climate, Energy Hardship Report, slide 10 (April 2024), available at: https://neada.org/wp-content/uploads/2024/04/neadahardshipreportAPR24.pdf.
[46] Nat'l Energy Assistance Dir. Assoc. (NEADA), Center for Energy Poverty & Climate, Energy Hardship Report, slide 10 (April 2024), available at: https://neada.org/wp-content/uploads/2024/04/neadahardshipreportAPR24.pdf.

Table 2: Impact of Rate Increase on Confirmed Low Income (CLI) Customers at Average Residential Usage

Month/Year	Average Usage of Residential Customers (Mcf)[47]	Bill at Current Rates in $/month on a Total Bill Basis[48]	Bill at Proposed Rates (After OPEB Credit Expires) in $/month on a Total Bill Basis[49]	Percent of Monthly Income at Current Rates[50]	Percent of Monthly Income at Proposed Rates (After OPEB Credit Expires)[51]
Jan-25	18.1	$123.94	$190.07	8.90%	13.64%
Feb-25	18.7	$162.64	$194.95	11.67%	13.99%
Mar-25	14.8	$132.29	$159.00	9.49%	11.41%
Apr-25	10.2	$95.71	$115.57	6.87%	8.29%
May-25	5.7	$59.77	$73.09	4.29%	5.25%
Jun-25	3.4	$ 41.38	$51.29	2.97%	3.68%
Jul-25	1.5	$26.30	$33.21	1.89%	2.38%
Aug-25	1.6	$29.02	$34.29	2.08%	2.46%
Sep-25	2	$32.52	$37.94	2.33%	2.72%
Oct-25	2.7	$38.58	$44.28	2.77%	3.18%
Nov-25	7.6	$80.94	$90.51	5.81%	6.50%
Dec-25	15.1	$146.73	$161.38	10.53%	11.58%
2025 TOTAL	**101.4**	**$969.82**	**$1,185.58**	**5.80%**	**7.09%**

Importantly, NFG reports that it does not track data on the average customer bill for confirmed low income customers.[52] The above Table therefore uses the average residential customer bill amount at average usage and the average income for NFG's confirmed low income customers to calculate CLI energy burdens. NFG proposes to increase those burdens even more, without the data to demonstrate what bill impact CLI customers will actually experience. It would

[47] NFG Response to OCA IV-15, Attachment, Current, Line 10. Attached hereto at Appendix B.
[48] NFG Response to OCA IV-15, Attachment, Current, Line 51. Attached hereto at Appendix B.
[49] NFG Response to OCA IV-15, Attachment, Proposed, Difference of Lines 53 and 29.
[50] NFG Response to CAUSE-PA 1-19 (Average annual income of CLI customers is $16,720/year, $1393.33/month); Response to OCA IV-15, Attachment, Current, Line 51. Attached hereto at Appendix B
[51] NFG Response to CAUSE-PA 1-19 (Average annual income of CLI customers is $16,720/year, $1393.33/month); NFG Response to OCA IV-15, Attachment, Proposed, Difference of Lines 53 and 29. Both attached hereto at Appendix B.
[52] NFG Response to CAUSE-PA 1-17.

be unjust and unreasonable to allow NFG any rate increase without requiring the Company to detail the impact its proposed rate increase would have on low income customers and to provide a meaningful plan to ameliorate the negative effects of such an increase.

As Table 2 depicts, the annual energy burdens carried by NFG's CLI customers are more than half of what the Commission considers to be an affordable energy burden – inclusive of both a consumer's gas and electric burdens. Importantly, the amount a low income household pays each month varies depending on their usage – just as it would for all residential customers. In February, when gas usage was highest,[53] low income households with average CLI income at average residential usage were charged as much as 11.7% of their income at current rates – exceeding what the Commission considers to be an affordable energy burden *for gas service alone*. At proposed rates, the average energy burden for these same households would increase over two full percentage points to 14%.

Q: In addition to the high energy burdens discussed above, is there other evidence that NFG's rates are not affordable for low income households?

A: Yes. NFG's low income customers carry a disproportionate amount of residential customer debt and are far more likely to have their service involuntarily terminated for nonpayment. If NFG's proposed rate increase is approved, these pronounced disparities will increase, as will the risk of consequences to the health and safety of low income customers and their households and the corresponding level of uncollectible expenses which are recovered from all ratepayers.

[53] NFG Revised Response to CAUSE-PA 1-16, Attachment– Revised. (In February 2025, the mean usage for residential customers was 187 Ccf and the mean usage for CLI customers was 191 Ccf). Attached hereto at Appendix B.

Confirmed low income customers who are not enrolled in CAP (non-CAP CLI customers) account for 9.6% of NFG's residential customers,[54] but experience disproportionate negative impacts as a result of the unaffordability of NFG's rates:

- 57.2% of NFG's payment troubled customers are non-CAP CLI customers;[55]
- 20.6% of NFG's non-CAP CLI customers are payment troubled;[56]
- 52% of the dollars in debt held by NFG's residential customers is held by non-CAP CLI customers;[57]
- Non-CAP CLI customers with debt to NFG carry on average $198.93 more in debt than do overall residential customers;[58]
- 49.7% of customers with active payment arrangements are non-CAP CLI customers;[59]
- Non-CAP CLI customers without an active payment arrangement carry 39.7% of residential dollars in debt not in a payment arrangement;[60]
- In 2025, 50.1% of uncollectible write-off expenses were for non-CAP CLI customers' debt.[61]

Critically, low income customers already have a markedly higher rate of termination compared to overall residential customers. In 2025, NFG terminated service to 7,711 households for non-payment.[62] Of those households, 3,344 were confirmed to have low income.[63] Confirmed low

[54] NFG Revised Response to CAUSE-PA 1-8, Attachment – Revised. Attached hereto at Appendix B.
[55] NFG Response to CAUSE-PA 1-21, Attachment. Attached hereto at Appendix B.
[56] NFG Revised Response to CAUSE-PA 1-8, Attachment - Revised; NFG Response to CAUSE-PA 1-21, Attachment. Both attached hereto at Appendix B.
[57] NFG Revised Response to CAUSE-PA 1-26, Attachment – Revised. Attached hereto at Appendix B.
[58] NFG Revised Response to CAUSE-PA 1-26, Attachment - Revised. Attached hereto at Appendix B.
[59] NFG Revised Response to CAUSE-PA 1-23, Attachment - Revised. Attached hereto at Appendix B.
[60] NFG Second Revised Response to CAUSE-PA 1-24, Attachment - Revised. Attached hereto at Appendix B.
[61] NFG Response to CAUSE-PA 1-18, Attachment. Attached hereto at Appendix B.
[62] NFG Revised Response to CAUSE-PA 1-13, Attachment – Revised. Attached hereto at Appendix B.
[63] NFG Revised Response to CAUSE-PA 1-13, Attachment – Revised. Attached hereto at Appendix B.

income households comprise 12.6% of NFG's residential customers but were 43.4% of those households whose service NFG terminated in 2025.[64]

These indicators demonstrate that NFG's low income consumers already have excessive energy burdens and struggle to pay for gas service, and will likely experience increased arrears, increased termination, and increased payment trouble if the proposed rate increase is approved without taking necessary measures to mitigate the impact of the increase on low income households.

Q: How does the involuntary termination of gas service impact a household?

A: Utility termination has severe, destabilizing impacts on low-income households. Involuntary loss of gas service has a deep and lasting impact on the health and well-being of an entire household – as well as the community. The loss of gas service can also have a significant impact on the ability of vulnerable populations to manage medical conditions and is particularly dangerous for certain groups – including seniors, families with young children, and individuals with a disability – each of whom are more likely than other residential households to experience poverty and income insecurity.[65] Furthermore, utility insecurity and resulting payment trouble is

[64] NFG Revised Response to CAUSE-PA 1-5, Attachment – Revised; NFG Revised Response to CAUSE-PA 1-8, Attachment – Revised; NFG Revised Response to CAUSE-PA 1-13, Attachment – Revised. All attached hereto at Appendix B. As of December 2025, NFG served 24,901 confirmed low income customers, 12.6% of the 197,241 residential customers it served.

[65] Charlie Harak, Olivia Wein, NCLC, Protecting Seriously Ill Consumers from Utility Disconnections: What States Can Do to Save Lives Now (Sept. 29 2022), at 5-6, available at: https://www.nclc.org/resources/report-protecting-seriously-ill-consumers-from-utility-disconnections-what-states-can-do-to-save-lives-now/.

increasingly recognized as a predictor of first-time homelessness.[66] Involuntary loss of gas service is often a contributing factor leading to family separation through the child welfare system.[67]

When a household is unable to use a primary heating system, they often resort to dangerous and/or high-usage/high-cost heating methods– such as electric space heaters, electric stoves, and/or portable generators – which increases the risk of carbon monoxide poisoning and house fires.[68] Heating equipment is a leading cause of fires in U.S. homes.[69] Space heaters are most often responsible for home heating equipment fires, accounting for more than two in five fires, as well as the vast majority of the deaths and injuries in home fires caused by heating equipment.[70] As of February 2026, NFG reported that at least 163 of its residential customers were *known* to be without a central heating source in the winter months, and at least 122 households were *known* to be using a potentially unsafe alternative heating source.[71] This is dangerous to the life and health of the individual family and the surrounding community, and is driven primarily by the inability of that family to afford the cost of service. Increasing the cost of service and the affordability gap, without concurrently providing strong mitigation to assure rates remain reasonably accessible to those in need, will exacerbate the health and safety consequences to Pennsylvania's most

[66] Colin Middleton, Kim Boynton, David Lewis & Andrew M. Oster, The Value of Utility Payment History in Predicting Homelessness, PLOS (Oct. 9, 2023), available at: https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0292305.
[67] Comments of Cynthia Figueroa, Commissioner, Philadelphia Dept. of Human Services, Review of Universal Service and Energy Conservation Programs, Pa. PUC Docket No. M-2017-2596907 (Aug. 8, 2017).
[68] Richard Campbell, Home Heating Fires, National Fire Protection Association (NFPA), (Jan. 2021), available at: https://www.nfpa.org/News-and-Research/Data-research-and-tools/US-Fire-Problem/Heating-equipment.
[69] Richard Campbell, Home Heating Fires, National Fire Protection Association (NFPA), (Jan. 2021), available at: https://www.nfpa.org/News-and-Research/Data-research-and-tools/US-Fire-Problem/Heating-equipment.
[70] Richard Campbell, Home Heating Fires, National Fire Protection Association (NFPA), (Jan. 2021), available at: https://www.nfpa.org/News-and-Research/Data-research-and-tools/US-Fire-Problem/Heating-equipment.
[71] Pa. PUC, 2025 Cold Weather Survey Results – Gas, available at: https://www.puc.pa.gov/media/3818/cws-press-final-2025.pdf.

economically vulnerable households, which are disproportionately single parents with young children, people of color, seniors, and people with a disability.

Q: Will the Low Income Home Energy Assistance Program (LIHEAP) mitigate the harm of the proposed rate increase on low income households?

A: No. LIHEAP is a federal program designed, in Pennsylvania, as a supplement to assist households to better afford energy services in winter, but the program only reaches an estimated 30% of eligible households and is not adequately funded to address existing unaffordability – let alone increased unaffordability because of increased rates. The program is subject to annual reauthorization and allocation of funding by the federal government, and it would be inappropriate to consider the availability of LIHEAP funding in evaluating the justness and reasonableness of NFG's rates.

Notably, despite severe, disproportionate, and rising levels of debt for low income households, LIHEAP grants received on behalf of NFG's low income customers declined precipitously from the 2022/2023 program year to the 2024/2025 program year, and continued federal funding for the program is uncertain.[72] In the 2025/2026 LIHEAP program year (as of April 11, 2026), the average LIHEAP Cash grant for gas heating customers was just $275.[73] For perspective, under NFG's proposed increase, the total bill for a residential customer using 80 Ccf of gas would be $81.48 per year. The proposed increase would thus subsume approximately 30% of the average 2025/2026 cash grant for gas consumers. NFG's total LIHEAP dollars have also steadily decreased in recent program years. For example, NFG's total LIHEAP dollars decreased

[72] NFG Response to CAUSE-PA 1-9, Attachment; National Energy Assistance Directors Assoc. (NEADA), President's FY 2027 Budget Eliminates Federal Funding For LIHEAP (April 3, 2026), available at: https://neada.org/wp-content/uploads/2026/04/PresidentBudget2027Response.pdf.
[73] See CAUSE-PA St. 1, Ex. Geller C-1 (Energy Assistance Summary (EASUM)): April 11, 2026.

from $9,521,950 in the 2022/2023 program year to $5,647,651 in the 2024/2025 program year.[74] NFG reports that, as of February 2025, it has only received $2,447,873 in total LIHEAP dollars.[75] The decline in LIHEAP grant awards received by NFG is a reflection of declining minimum and maximum grant award levels, which was in turn driven by declining federal funds.[76] Continued funding for future LIHEAP seasons is uncertain, and the current administration has proposed to cut the program in its entirety.[77] Even if the program is authorized to continue in future program years, LIHEAP has not eliminated the excessive arrears, service terminations, and energy burdens of NFG's low income customers – and its continuation will not mitigate the impact of the proposed rate increase.

Q: Will low income customers be able to offset the cost of the proposed rate increase through conservation and/or installation of energy efficiency measures?

A: No, not as proposed. As explained in detail below, NFG's proposed rate design, including its fixed residential charge proposal and proposal to make permanent its pilot WNA, will substantially erode the ability of low income customers to control energy costs through reduced usage or energy efficiency measures.

[74] NFG Response to CAUSE-PA 1-9, Attachment. Attached hereto at Appendix B.
[75] NFG Response to CAUSE-PA 1-9, Attachment. Attached hereto at Appendix B.
[76] Pa. DHS, LIHEAP FY 2023 Final State Plan, at ii; Pa. DHS, LIHEAP FY 2024 Final State Plan, at ii; Pa. DHS, LIHEAP FY 2025 Final State Plan at ii.
[77] National Energy Assistance Directors Assoc. (NEADA), President's FY 2027 Budget Eliminates Federal Funding For LIHEAP (April 3, 2026), available at: https://neada.org/wp-content/uploads/2026/04/PresidentBudget2027Response.pdf.

Q: Do you have any proposals that could help remediate the financial impact of NFG's proposed rate increase on low income consumers?

A: Yes. I have several recommendations to help mitigate the financial impact of NFG's proposed rate increase on low income households, which I will discuss in detail below. I recommend several reforms to NFG's universal service programs to improve enrollment and retention and to ensure that the programs are more widely available, adequately funded, and prudently designed to assist low income households to reasonably connect and maintain gas service to their homes.

IV. UNIVERSAL SERVICE PROGRAMS

Q: Please briefly describe NFG's universal service programs.

A: NFG is required by statute to maintain a portfolio of universal service programs designed to assist low income households to connect and maintain services in their homes. These programs are detailed in NFG's Universal Service and Energy Conservation Plan (USECP).[78] NFG's universal service programs include (1) NFG's CAP (formerly known as the Low Income Residential Assistance Program (LIRA)), (2) a Low Income Usage Reduction Program (LIURP), (3) a Hardship Fund (Neighbor for Neighbor Heat Fund or NFN), and (4) a Customer Assistance and Referral Evaluation Services (CARES).[79] As part of its LIURP, NFG offers a Low Consumption LIURP (LC-LIURP) and an Emergency Repair and Replacement Program (ERRP).[80]

[78] National Fuel Gas Distribution Corporation, Universal Service and Energy Conservation Plan (USECP), Docket No. M-2021-3024935, (revised January 2, 2024) (hereinafter 2022-2026 USECP).
[79] 2022-2026 USECP at 3.
[80] 2022-2026 USECP at 5-6.

In this Section, I will address NFG's CAP, LIURP, and NFN programs and provide recommendations for how NFG should improve each of these programs to better address the need for assistance for NFG's low income customers to remediate rate unaffordability at both existing and proposed rates.

Q: Why is it appropriate to address these programs in the context of reviewing NFG's proposal to increase rates for residential service?

A: NFG's universal service programs are designed to work in tandem to provide bill assistance, arrearage management, usage reduction, and crisis assistance – helping to ensure that, based on the rates within the Company's service area, consumers with limited economic means can reasonably afford to connect and maintain service to their home. The Commission ordinarily reviews these programs every five years. However, in the interim, when changes are proposed within a particular service territory that will affect low income customer households' ability to afford and maintain service, it is critical to examine the effect of those changes, whether a utility's universal service programming, rules, and policies require modification as a result of an intervening rate increase, and, if so, to make necessary changes prior to approval of the increase to remediate that impact. Importantly, although the Commission ordinarily reviews a utility's universal service programs every five years, the Commission granted NFG's request to extend its current 2022-2026 USECP through September 1, 2028.[81] As such, it is critical that, in order to avoid an extensive period of irreparable hardship, NFG's universal service programs be examined in the context of the current proceeding.

[81] Secretarial Letter, Re: NFG 2022-2026 USECP at Docket No. M-2021-3024935 Request for Extension of Time to File NFG's Next Third-Party Evaluation and USECP, Docket No. M-2021-3024935 (Dec. 11, 2024).

Assessing the adequacy of universal service programming to remediate rate unaffordability each time rates are proposed to increase is an essential element in determining the justness and reasonableness of the proposed increase, as well as the adequacy of the customer service which is provided to the low income customer base. Failures to provide such an examination *and* act to remediate the effects in the context of a rate case causes low income households to face unjust and unreasonable rates, resulting in increased involuntary termination rates for low income households and higher uncollectible expenses for other residential consumers.

Q: Has NFG proposed any changes to its universal service programs in this case?

A: In its initial filings, NFG did not propose any changes to its universal service programs.[82] In response to discovery, however, NFG reported that it is evaluating certain changes to its NFN hardship fund.[83] NFG reports that on account of the low level of available funding in its NFN, the Company is proposing (1) to make both income and a specified hardship mandatory criteria for eligibility, (2) limiting the program to only NFG customers, and (3) adding "flexibility to adjust the grant amount based on demand."[84] I will address these proposed changes later in this section of my testimony.

a. Customer Assistance Program (CAP)

Q: Please briefly describe NFG's Customer Assistance Program (CAP).

A: NFG's CAP provides reduced monthly rates and arrearage forgiveness to heating customers with income at or below 150% FPL.[85] CAP rates are calculated based on the applicable

[82] NFG St. 17 at 3:19; 6:5.
[83] NFG Response to CAUSE-PA 1-2. Attached hereto at Appendix B.
[84] NFG Response to CAUSE-PA 1-2. Attached hereto at Appendix B.
[85] 2022-2026 USECP at 23.

percentage of income (PIP) or average monthly bill amount, whichever is lower, with a minimum bill amount of $12.[86] PIP rates are set at 4% of household income for those households between 0-50% of FPL and 6% for those households between 51%-150% of FPL[87] Average monthly bill amounts are calculated per NFG's Balanced Billing Plan as described in the Company's tariff – that is, the bill amount is 1/12th of the customer's estimated annual bill.[88] NFG monitors CAP customers' energy burdens quarterly to ensure compliance with the 4% and 6% income percentage requirements.[89]

NFG transitioned its CAP to a PIP rate model in April 2024.[90] The transition to a PIP rate model is a substantial improvement in the design of NFG's CAP that helps ensure enrolled customers receive more affordable gas bills. However, NFG's effectiveness at protecting low income NFG households from unaffordability, at both existing and proposed rates, is undercut by the low enrollment of eligible households in its CAP program.

Q: Are customers who are enrolled in NFG's CAP protected from the financial impact of the rate increase?

A: That answer depends on the type of CAP rate the customer receives and, for some, when the rate is assigned. CAP customers with a PIP rate and/or minimum bill rate will not experience an impact to their monthly payment.[91] CAP customers with an average monthly bill rate, however, will experience an increase at the time of their annual budget bill adjustment, up to the amount of their applicable PIP rate. If a CAP customer's average monthly bill amount exceeds the PIP rate,

[86] 2022-2026 USECP at 22.
[87] 2022-2026 USECP at 21.
[88] 2022-2026 USECP at 22; Supplement No. 236 to National Fuel Gas Distribution Corporation Tariff Gas Pa. P.U.C. No. 9 at Second Revised Page No. 23.
[89] 2022-2026 USECP at 65.
[90] NFG St. 17 at 2:15-17.
[91] NFG Response to CAUSE-PA 1-1. Attached hereto at Appendix B.

their bill amount will be switched to the PIP rate with the next quarterly adjustment. Importantly, 42% of NFG's CAP enrollees receive average bills and will experience higher bills as a result of any approved rate increase.[92]

Q: How many of NFG's low income customers are enrolled in CAP?

A: CAP only reaches a small portion of the eligible population. As of December 2025, only 10.8% of the 57,542 NFG customers who are estimated to have low income were enrolled in CAP.[93] Only 25% of the 25,308 customers that the Company has confirmed to have low income are enrolled as of January 2026.[94] This means that between 75% to 89.2% of NFG's low income customers are not enrolled in CAP and will bear the full, unmitigated impact of any residential increase that the Commission allows to take effect.

Note that the current figures represent a backslide from NFG's CAP enrollment figures at the time of the Company's previous base rate case. In November 2022, NFG had enrolled 28.4% of its confirmed low income customers in CAP, or 11.2% of its estimated low income customer population.[95] As such, a smaller proportion of NFG's low income customers are enrolled in CAP today than the last time NFG requested a revenue increase. The Commission must require that NFG take action to correct course and ensure that its CAP reaches eligible households to protect them from unaffordability at existing and proposed rates.

[92] NFG Revised Response to CAUSE-PA 1-3, Attachment – Revised. Attached hereto at Appendix B. As of January 2026, 2,663 of the 6,341 NFG customers enrolled in CAP receive average bills.
[93] NFG Revised Response to CAUSE-PA 1-6, Attachment; NFG Response to CAUSE-PA 1-10, Attachment, "Estimate of the Number of National Fuel's Low Income Households" Both attached hereto at Appendix B.
[94] NFG Revised Response to CAUSE-PA 1-6, Attachment; NFG Revised Response to CAUSE-PA 1-5, Attachment – Revised. Both attached hereto at Appendix B.
[95] Direct Testimony of Harry S. Geller on Behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), Docket No. R-2022-3035730 at 26:3-6, and Table 2.

Q: Do you have concerns about the number of NFG low income customers that are not enrolled in CAP?

A: Yes. CAP is a critically important affordability program that, as discussed above, helps to substantially reduce low income termination rates among its participants. CAP is specifically designated in the Natural Gas Choice Act as one of the Universal Service Programs intended to assist the low income population within a natural gas distribution company service territory to maintain service to their home.[96] NFG's CAP rates are its most affordable and advantageous. However, a significant majority of customers eligible for CAP assistance are not enrolled, effectively undercutting the intent of the Choice Act and limiting the ability of CAP to mitigate unaffordability for its low income customer population at proposed and present rates. In addition, non-response to recertification attempts is the single largest reason NFG customers are removed from the Company's CAP, responsible for more than half of all CAP removals.[97] In 2024, NFG's CAP default rate – the percentage of CAP customers who missed payments, made late payments, or failed to recertify – was 48.6% for all NFG CAP income tiers, more than double the industry averages of 17.6% for 0-50% FPL, 14.0% for 51-100% FPL, and 18.4% for 101-150% FPL.[98] Nearly half of NFG's CAP customers struggle to comply with the Company's program requirements to stay enrolled, including its process for recertification, indicating a clear need for improvements. The Commission should require NFG to take action to ensure its eligible customers

[96] 66 Pa.C.S. §§ 2202, 2203

[97] NFG Response to CAUSE-PA 1-11, Attachment; NFG Response to CAUSE-PA 1-12, Attachment. Both attached hereto at Appendix B. In 2025, 2,589 NFG CAP customers were removed from CAP, with 1,385 (53.5%) of those removed for non-response; 2022-2026 USECP at 63.

[98] Pa. PUC, Universal Service Programs & Collections Performance, 2024 Report (hereinafter 2024 Universal Service and Collections Report) at 59.

can enroll – and stay enrolled – in the Company's CAP to ensure customers can access service at the most affordable and advantageous rate.[99]

Q: Do you have any suggestions for how NFG can improve CAP enrollment?

A: Yes. To address the serious under-enrollment of NFG's CAP, I recommend that NFG be required to make several important reforms to (1) improve its CAP attrition rate by changing its recertification process to include alternative forms of communication; (2) improve how it utilizes data obtained through the Pennsylvania Department of Human Services (DHS) LIHEAP Data Sharing Program to conduct more effective outreach to customers who are potentially eligible for CAP and to automatically recertify CAP customers to eliminate duplicative and unnecessary barriers to remaining in the Program; (3) implement benchmarks related to CAP enrollment to provide measurable goals to improve Program enrollment and retention; and (4) regularly report application and recertification data to NFG's Universal Service Advisory Committee (USAC) so that stakeholders can monitor the Company's progress toward achieving those benchmarks. I will address each of these recommendations in turn.

Q: Please briefly describe NFG's CAP recertification process.

A: NFG requires recertification of CAP eligibility every two years, or for those who receive Social Security, Supplemental Security Income, or a pension, or who have received LIHEAP benefits since enrolling in CAP, every three years.[100] For customers reporting zero income, NFG requires recertification every six months.[101] When CAP customers are due to recertify, the Company mails a letter and an application to prove continued eligibility.[102] If no response is

[99] 66 Pa. C.S. § 1303.
[100] 2022-2026 USECP at 60.
[101] 2022-2026 USECP at 60.
[102] 2022-2026 USECP at 60.

received in 10 days, a second letter and application are mailed, and NFG attempts to contact the customer by telephone to explain the recertification process.[103] If NFG does not receive a response from the customer, it removes the customer from CAP, returning the customer to a full tariff bill.[104] NFG notifies customers that have been removed from CAP by mailing a program cancellation letter.[105]

Q: Do you have any concerns about NFG's CAP recertification process?

A: Yes. I am concerned that NFG's CAP recertification process appears to require that a CAP customer return an application to recertify and provide income documentation by mail – requiring additional time and resources to obtain physical copies of income verification documents, as well as the hassle of obtaining an envelope and stamp and the added time to get to the post office and mail in the recertification.[106] NFG implemented an online CAP application in January 2025 that enables customers to complete their application and provide supporting documentation online.[107] The Company's USECP describes the online CAP application process,[108] but there is no indication that NFG's online customer portal enables a customer to complete a recertification or provide supporting documentation for recertification online.[109] In addition, NFG's outreach to inform a customer that they are due to recertify their CAP eligibility appears to be limited to two mailed notifications and a single telephone call before a CAP household is removed from the program.[110] Further, NFG's procedure for notifying customers that they have been removed from CAP is simply to mail a letter. This is especially troublesome in light of the fact that the majority of

[103] 2022-2026 USECP at 60.
[104] 2022-2026 USECP at 60.
[105] 2022-2026 USECP at 60-61.
[106] 2022-2026 USECP at 60.
[107] NFG St. 17 at 3:9-10; 2022-2026 USECP at 33-34.
[108] 2022-2026 USECP at 33-34.
[109] 2022-2026 USECP at 60.
[110] 2022-2026 USECP at 60.

customers who are removed from CAP are removed for non-response to NFG's mailed recertification form, which suggests that mailed communication is not effective in reaching these households.

Q: Do you have any recommendations for how NFG could improve its CAP attrition rate?

A: Yes. First, I recommend that the Commission require NFG to reform its CAP recertification process to improve program attrition. To the extent the Company's online customer portal does not already allow recertification online, the Commission should require NFG to expand its online CAP application to support online CAP recertification including document uploading. The CAP application and recertification portal should be required to be accessible on both desktop and mobile browsers, as low income households are more likely to be reliant on mobile internet.[111] For mailed recertification outreach, NFG should be required to include a self-addressed stamped envelope to facilitate returning required information.

In addition, the Commission should require that NFG expand its efforts to contact customers who are due for recertification to include email and text message outreach, and all forms of outreach should contain information and links for how to complete the CAP recertification process online. Further, the Commission should require that NFG inform CAP customers of their removal from CAP by mail, email, text message, and telephone, and require that these notifications contain instructions on how to re-apply for CAP. Mailed notifications of CAP removal should include a new CAP application as well as information about how to apply or recertify online, and

[111] Colleen McClain and William Bishop, What we know about internet use, smartphone ownership and digital divides in the U.S., Pew Research (Jan. 8, 2026) Available at: https://www.pewresearch.org/short-reads/2026/01/08/internet-use-smartphone-ownership-digital-divides-in-u-s/.

email and text message notifications should contain links to the online CAP application, and telephone notifications should make a warm referral to complete a CAP application by phone.

As discussed below, NFG should also improve its utilization of LIHEAP data to expand CAP enrollment and improve CAP recertification.

Q: Can you explain the Pennsylvania Department of Human Services (DHS) LIHEAP Data Sharing Program and the current status of the program?

A: In October 2024, following years of collaborative policy development through the DHS LIHEAP Advisory Committee, DHS launched a LIHEAP Data Sharing Program. Through the program, if a LIHEAP recipient checks a box on their LIHEAP application providing their affirmative consent, DHS will share detailed income and household composition data for LIHEAP recipients with participating utilities. To participate, utilities must sign a data sharing agreement with DHS, which includes detailed data security parameters and affirmatively requires utilities to use the data for the limited purpose of enrolling or recertifying eligible households into the utilities' universal service programs.[112]

On June 13, 2024, in anticipation of DHS's launch of this new LIHEAP Data Sharing Program, the Commission issued an Order encouraging utilities to participate, suggesting ways that utilities could utilize the data, and establishing a process for utilities to follow to implement certain pre-approved data uses – such as streamlined outreach and enrollment and/or auto-recertification.[113] Specifically, the Order established a process by which utilities could file a letter

[112] See DHS Data Sharing Agreement Template.
[113] 2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs, M-2023-3038944, Order at 5 (June 13, 2024).

with the Commission outlining how the utility will use the shared data to streamline program outreach and enrollment and/or to implement auto-recertification.[114]

Q: Is NFG participating in the DHS Data Sharing Program?

A: Yes.[115]

Q: Did NFG develop a process for utilizing the data provided by DHS in response to the Commission's June 13, 2024 Order?

A: Yes. NFG reports that since August 2025, the Company has used data sharing files from DHS to conduct outreach to customers who received LIHEAP but are not enrolled in CAP.[116] NFG reports that it mails these customers simplified applications for CAP and an overview of the Program.[117] For CAP customers who agree to share data through the LIHEAP data sharing process, NFG reports that it will use data from DHS to automatically recertify CAP eligibility if a recertification is needed.[118]

NFG reports that since August 2025, it mailed simplified applications to 3,313 customers, 615 of whom NFG enrolled in CAP.[119] NFG also reports that, during the same period, it recertified CAP eligibility for 52 CAP customers using LIHEAP data received from DHS.[120]

[114] 2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs, M-2023-3038944, Order at 5 (June 13, 2024).
[115] NFG St. 13 at 3:10-13.
[116] NFG Response to CAUSE-PA 3-28; Response to CAUSE-PA 3-27. Both attached hereto at Appendix B.
[117] NFG Response to CAUSE-PA 3-27. Attached hereto at Appendix B.
[118] NFG Response to CAUSE-PA 3-27. Attached hereto at Appendix B.
[119] NFG Response to CAUSE-PA 3-28, Attachment. Attached hereto at Appendix B.
[120] NFG Response to CAUSE-PA 3-28, Attachment. Attached hereto at Appendix B.

Q: Do you have any concerns about NFG's procedures for using LIHEAP data for CAP enrollment and recertification?

A: Yes. I am concerned that NFG is not doing more to enroll customers it knows to be eligible in its CAP and to recertify those already enrolled. The data NFG receives from DHS through the LIHEAP data sharing program is incredibly useful in that it indicates both that these customers are income-eligible for CAP and that they have affirmatively expressed their desire to participate and the need for assistance to enroll in utility-run energy assistance programming. Despite the importance of this data, the Company's use of LIHEAP data for CAP enrollment and retention appears to be limited. For example, NFG reports that only about 19% of the customers to whom it mailed simplified applications enrolled in CAP as a result of the mail outreach. Further, while NFG indicates that it uses that data to recertify customers "if a recertification is needed[121]", only 52 customers have been recertified for CAP through this process since August 2025.[122]

Q: Do you have any recommendations to improve how NFG uses DHS LIHEAP data for CAP enrollment and recertification?

A: Yes. The Commission should direct NFG to improve how it utilizes the data it receives through the DHS LIHEAP data sharing program to enroll and recertify customers for CAP. First, a single letter to households already known to be categorically eligible for CAP is insufficient. NFG should expand and improve its outreach to customers who have elected to share LIHEAP data with the Company, but who are not enrolled in CAP. As an initial step to improve leveraged use of LIHEAP data, I recommend NFG model further outreach on the expanded CAP recertification outreach procedure I discussed above. At a minimum, NFG should contact LIHEAP

[121] NFG Response to CAUSE-PA 3-27. Attached hereto at Appendix B.
[122] NFG Response to CAUSE-PA 3-28, Attachment. Attached hereto at Appendix B.

recipients who agreed to participate in DHS data sharing by mail, email, text message, and phone call to provide a simplified process for enrollment. A customer's verbal authorization to enroll should be sufficient, and all outreach should include instructions on how to call NFG to provide verbal authorization for CAP enrollment. Mailed outreach should include a program overview and a pre-stamped postcard with a single checkbox to enroll. Email outreach should contain a program overview and link to authorize CAP enrollment with a single checkbox. Text message outreach should include a link to a program overview and allow CAP enrollment authorization by responding "yes." For telephone outreach, a customer's verbal authorization to enroll should be sufficient to enroll the customer in CAP. If no response is received in 10 days, the Company should repeat this outreach. These customers have affirmatively indicated that they would like assistance to enroll in their utility's energy assistance programs by opting into the LIHEAP data sharing process, so NFG must do more to explain CAP and simplify the enrollment process. NFG should work with its USAC to develop the language for its outreach communications to ensure the information is in plain language, includes clear information about the benefits of enrollment – as well as clear instructions on the simplified application process.

Second, NFG should use the LIHEAP data it receives to recertify CAP eligibility for all CAP customers participating in LIHEAP data sharing, not just those who are due for recertification. Whenever NFG receives a CAP customer's data through the LIHEAP data sharing program, NFG should treat the receipt of that data as a new recertification, restarting the three-year or six-month recertification period, regardless when the customer had been due for recertification. NFG should send a simple notice to the participant following the auto-recertification advising that they were automatically recertified for CAP and the date of their next

recertification date. This would extend the recertification period for thousands of households, helping to significantly reduce administrative costs and streamline procedures.

Q: Do you have other recommendations to improve NFG's CAP enrollment and recertification?

A: Yes. I recommend that NFG establish benchmarking goals for its CAP enrollment based on the percentage of its estimated low income customers. Specifically, NFG should strive to increase its CAP enrollment by a minimum of 5% each year as a percentage of its estimated low income customers and should set forth a plan to do so through increased outreach, education, and implementation of the screening process I recommended earlier in my testimony. I recommend measuring against the estimated low income customer count because that figure provides a more realistic estimate of NFG's low income population – and avoids the circuitous nature of reliance on confirmed low income customer counts to determine the reasonableness of service to NFG's low income customer population. As discussed, NFG's confirmed low income customer count is not adequately representative of NFG's low income customer base.

I believe that setting reasonable and verifiable benchmarks to improve CAP enrollment as a percentage of the estimated low income customer count will help ensure that the Company is reaching a greater percentage of its low income population - helping meet the increased need for rate assistance as a result of NFG's proposed rate increase and in turn reducing the disproportionately high rates of terminations and uncollectible expenses attributable to NFG's low income customer base.

In addition, the Commission should require NFG to report CAP application and recertification data to its USAC regularly. This data should include, at minimum, applications received, approved, and denied, including the reasons for denial, and the number of recertifications

issued, the number of recertifications resulting in continued CAP eligibility, and the number of recertifications resulting in CAP removal, including the reasons for removal. Providing this data at regular intervals will allow stakeholders to monitor NFG's progress toward its benchmark goals.

Q: Do you have any other concerns about NFG's CAP which you would like to address in the context of this testimony?

A: Yes. I have serious concerns about deficiencies in NFG's data tracking for its CAP customers. Throughout the preparation of this testimony, NFG provided incomplete and inaccurate information about its CLI and CAP customers that it corrected and backfilled through a series of revisions.[123] I provide my testimony based on the data NFG was able to provide, but I have serious concerns about the accuracy and completeness of the data provided. Even after multiple rounds of revisions to its discovery responses, NFG reports that it does not track and cannot report information regarding the total dollars in debt or average arrearage level for CAP customers.[124] NFG ultimately provided this data for the current billing cycle only and indicated that it could not provide this data for past periods.[125] Importantly, it appears that NFG is not reporting data regarding its CAP customers with accounts in arrears to the Commission as part of its annual Collection Reporting.[126]

Beyond this deficiency, there is clear evidence of issues with NFG's tracking and reporting in the Commission's Universal Service Programs and Collections Performance report. From 2022 through 2024, NFG reported having the exact same percentage of households defaulting on CAP

[123] See e.g. NFG Revised Response to CAUSE-PA 1-8, Attachment – Revised; NFG Second Revised Response to CAUSE-PA 1-26; et al. Attached hereto at Appendix B.
[124] NFG Second Revised Response to CAUSE-PA 1-26. Attached hereto at Appendix B.
[125] NFG Second Revised Response to CAUSE-PA 1-26, Attachment – Revised-2. Attached hereto at Appendix B.
[126] NFG Response to OCA IV-1, Attachment. Attached hereto at Appendix B.

in each CAP income tier, raising concerns about the accuracy of these customer counts.[127] What is more, in 2024, NFG reported spending just 17% of program costs on CAP credits and 60% on arrearage management, a massive departure from every other utility and common sense.[128]

Without accurate and complete data regarding arrearages for CAP customers, it is impossible for the Commission or any stakeholders to fully assess how well NFG's CAP is functioning to deliver affordable bills to customers enrolled in the Program. I recommend that the Commission order NFG to begin tracking and reporting data regarding the total number of CAP accounts with arrears, the total dollar amount in debt for CAP customers, and the average amount of debt for CAP customers. In addition, the Commission should commence an audit of NFG's collections and universal service program reporting to assess the need for additional corrective actions.

b. Low Income Usage Reduction Program (LIURP)

Q: Please briefly describe NFG's LIURP.

A: NFG's LIURP is a critical universal service program designed to work in tandem with CAP to help reduce high usage attributable to home energy inefficiencies that low income households cannot afford to address on their own.[129] The program achieves this purpose by conserving energy, reducing bills, improving payments, decreasing collections costs, reducing peak demand, and improving home health, safety, and comfort.[130]

NFG's LIURP is available to customers with income at or below 150% FPL, or up to 200% FPL for households with special needs, such as seniors, people with disabilities, or households

[127] 2024 Universal Service and Collections Report at 59.
[128] 2024 Universal Service and Collections Report at 69-70.
[129] 52 Pa. Code § 58.1; 2022-2026 USECP at 36.
[130] 52 Pa. Code § 58.1.

with young children.[131] To qualify for LIURP services, a household must have annual usage of at least 1,300 Ccf.[132] Since 2020, NFG has maintained a Low Consumption LIURP (LC-LIURP) pilot program, which expands LIURP services to households with usage of at least 900 Ccf, who would otherwise be excluded from LIURP eligibility.[133] The Commission approved extension of the LC-LIURP pilot through the duration of the Company's current USECP.[134] In addition, NFG operates an Emergency Repair and Replacement Program (ERRP) through its LIURP, which provides emergency repair and replacement of gas heating or hot water heating equipment for LIURP-eligible customers.[135]

Q: Is NFG proposing any changes or improvements to its LIURP in the context of the present proceeding?

A: No.[136]

Q: Is NFG's LIURP performing adequately to achieve its goals and objectives?

A: No. There is a significant unmet need for LIURP services among NFG's low income customers. Most low income households are unable to afford the costs of repairs and improvements necessary to stem high usage levels and resultant higher monthly bills. As a result, low income customers with high usage are often charged higher bills but do not have the resources to afford them, leading to disproportionate termination rates and higher arrearages.

NFG customer households receiving LIURP services see significant usage reductions of on average 18-20%.[137] This usage reduction translates into bill savings, improving affordability

[131] 2022-2026 USECP at 38.
[132] 2022-2026 USECP at 38.
[133] NFG St. 17 at 4:18-23; NFG USECP at 36.
[134] NFG St. 17 at 4:18-23.
[135] 2022-2026 USECP at 5.
[136] NFG St. 17 at 6:5.
[137] NFG USECP at 5.

and reducing energy burdens. For CAP customers participating in LIURP, the energy savings achieved result in reduced CAP credits, reducing the cost of the CAP program and thereby improving affordability for all residential ratepayers. For households who are able to participate in LIURP, the program provides meaningful usage reduction that could help mitigate the impact of any approved increase in NFG's volumetric rates. But as the program is currently designed, NFG's LIURP is simply inadequate to meet the need for energy efficiency services among the Company's low income customers, let alone to offset the increased rates NFG proposes in this case. Critical changes are necessary to promote the ability of NFG's LIURP to effectively reach the Company's low income customers.

According to the Company's 2024 LIURP Needs Assessment, 37,867 NFG customers are income eligible for LIURP services, and another 20,590 could be income eligible as special needs customers (i.e., seniors, people with disabilities, or households with young children).[138] Despite the potential for the Program to provide meaningful savings to low income households, NFG's LIURP serves relatively few households compared to identified need and consistently completes fewer jobs than the Company projected to complete in its USECP. The table below presents the number of LIURP and LC-LIURP jobs NFG projected to perform from 2023 to 2025 compared to the actual number of jobs completed.

[138] APPRISE, National Fuel Gas LIURP Evaluation Final Report, Sept. 2024 at 17.

Table 3: Projected and Actual LIURP Jobs Numbers, 2023-2025

Year	Projected LIURP and LC-LIURP Jobs[139]	Completed LIURP and LC-LIURP Jobs[140]
2023	112	78
2024	234	101
2025	226	187
TOTAL	**572**	**366**

As the above Table shows, NFG completed just 187 LIURP jobs in 2025.[141] At this pace, NFG reports that it would take the Company approximately 206 years to treat all 37,867 income eligible customers, not counting any special needs customers who are also eligible, with the caveat that not all customers would meet the 1,300 Ccf or 900 Ccf usage threshold for traditional LIURP or LC-LIURP.[142]

Further, NFG consistently underspends its LIURP budget. In testimony which I provided in NFG's previous rate case, I noted that the Company had failed to expend its LIURP budget in any year between 2018 through 2022.[143] The Company reports that it failed to fully expend its LIURP budget in each year from 2023 to 2025.[144] NFG budgets $1,391,000 annually for its LIURP,[145] but spent only $307,012 of that budget in 2023 and $804,649 in 2024.[146] NFG spent $1,353,436 of its LIURP budget in 2025, but credits the improvement in spending to "unique circumstances in 2025, when a government shutdown resulted in additional work being redirected

[139] 2022-2026 USECP at 41. The numbers provided in this table include only traditional LIURP and LC-LIURP jobs; ERRP jobs are excluded.
[140] NFG Response to CAUSE-PA 2-1, Attachment; NFG Response to CAUSE-PA 2-4, Attachment. Attached hereto at Appendix B. The numbers provided in this table include only traditional LIURP and LC-LIURP jobs; ERRP jobs are excluded.
[141] NFG Response to CAUSE-PA 2-8. Attached hereto at Appendix B.
[142] NFG Response to CAUSE-PA 2-8. Attached hereto at Appendix B.
[143] Direct Testimony of Harry S. Geller on Behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), Docket No. R-2022-3035730 at 31:1-2.
[144] NFG Response to CAUSE-PA 2-10, Attachment. Attached hereto at Appendix B.
[145] 2022-2026 USECP at 40.
[146] NFG Response to CAUSE-PA 2-9, Attachment. Attached hereto at Appendix B.

from community agencies to the Company, potentially inflating the current year's figures," and indicates that the company "remains cautious when projecting expenditures for 2026."[147] In response to discovery, however, NFG indicated that it also credits the increase in LIURP spending and jobs performed in 2025 to expanded outreach efforts to raise awareness of the program and to steps the Company has taken to find contractors able to handle additional and more consistent work.[148]

NFG reports a notable uptick in LIURP applications that it received in 2025. NFG received 1,004 applications for LIURP in 2025, up from 404 in 2024 and 321 in 2023.[149] I am supportive of NFG's expanded efforts to conduct outreach and develop new referral streams for LIURP. However, these efforts alone are not sufficient as the significant need for LIURP services among NFG's low income customers continues to remain unmet. I recommend that NFG be required to implement meaningful reforms to its LIURP so that low income customers can better access Program services.

Q: Do you have other concerns about the design of NFG's LIURP?

A: Yes. The 2024 National Fuel Gas LIURP Evaluation Final Report indicates that the Company excludes mobile homes from LIURP eligibility.[150] However, the 2024 LIURP Evaluation indicates that 5,745 of NFG's customers who are income eligible for LIURP reside in mobile homes.[151] Energy efficiency retrofits can effectively lower energy usage and bills for residents of mobile homes while improving home comfort and safety.[152] As part of the 2024

[147] NFG St. 17 at 5:9-16.
[148] NFG Response to CAUSE-PA 2-7; NFG Response to CAUSE-PA 5-20. Both attached hereto at Appendix B.
[149] NFG Response to CAUSE-PA 2-15, Attachment. Attached hereto at Appendix B.
[150] APPRISE, National Fuel Gas LIURP Evaluation Final Report (Sep. 2024) at v,
[151] APPRISE, National Fuel Gas LIURP Evaluation Final Report, Sept. 2024 at 28-29.
[152] ACEEE, Upgrading Manufactured Homes: Using Energy Efficiency to Improve Affordability and Health (Aug. 2023) at 7.

LIURP Evaluation prepared by APPRISE, when NFG LIURP service providers were asked to offer suggestions to improve the Company's LIURP, one provider "stressed the inclusion of mobile homes," asserting that "there is a lot of potential with mobile homes," and indicated that the provider agency has experience delivering energy efficiency measures to mobile homes through other programs.[153] I am concerned that by excluding these types of homes, NFG needlessly and unfairly shrinks the pool of customers that could benefit from program services – leaving mobile homeowners, often in the most need of weatherization and efficiency services, without a path to reduce high usage.

Q: Do you have recommendations that would help NFG's LIURP reach a greater number of homes in need of service?

Yes. As discussed above, only a very small number of customers have been able to access LIURP services despite the vast unmet need for these services in NFG's service territory. However, the increase in the numbers of applications for LIURP and completed LIURP jobs in 2025 is an incremental step in the right direction. NFG should be directed to implement reforms which build on its existing efforts so that low income customers can access LIURP services.

First, the Commission should require NFG to develop a written comprehensive plan to expend its full LIURP budget and expand the availability of usage reduction services to those in need. NFG should include action steps designed to fully spend the existing budget that has been rolled over from prior years, as well as plans to ensure that NFG can fully spend its budget in each subsequent year. This plan should be informed by NFG's third-party evaluation, with input and recommendations from members of NFG's USAC. The plan should specifically address coordination with other energy efficiency programs available in NFG's service territory and should

[153] APPRISE, National Fuel Gas LIURP Evaluation Final Report, Sept. 2024 at 46.

include action steps designed to prioritize services to those most in need of usage reduction services (including high users with identified health and safety barriers) while opening the door to those not currently able to access assistance through the program. Additionally, the plan should specifically evaluate the expanded outreach efforts and referral streams NFG credits with driving increased applications in 2025, identify specific strategies that successfully generated increased applications for LIURP services and completed LIURP jobs, and develop specific action steps to continue and expand upon those strategies. I recommend that the Commission require NFG to file this written plan at its USECP docket within 90 days of the effective date of rates in this proceeding.

Additionally, the Commission should require that NFG end its exclusion of mobile homes from participating in its LIURP. The Company serves many potentially eligible customers who reside in these dwelling types,[154] and at least one NFG LIURP provider agency has indicated it has the technical capacity to provide services to mobile homes.[155] Expanding the pool of eligible households would enable these customers to access critical energy and bill savings and would help NFG to reach its LIURP jobs projections.

c. Neighbor for Neighbor (NFN) Hardship Fund

Q: Please briefly describe NFG's Neighbor for Neighbor Heat Fund.

A: The Neighbor for Neighbor Heat Fund (NFN) is NFG's hardship fund. NFN provides grants not only to its residential customers, but to any resident of its service area in need of assistance purchasing heating fuel or repairing or replacing heating equipment.[156] The maximum

[154] APPRISE, National Fuel Gas LIURP Evaluation Final Report, Sept. 2024 at 28-29.
[155] APPRISE, National Fuel Gas LIURP Evaluation Final Report, Sept. 2024 at 46.
[156] 2022-2026 USECP at 45.

NFN grant is $500 for customers and $300 for non-customers.[157] Households under 200% FPL or who meet other specified eligibility criteria (households with a member who is age 55 or older, has a disability, receives unemployment compensation, has a recent loss of income, is a veteran, or has a medical emergency) are eligible to receive a grant.[158] Per the Commission Order approving the Joint Petition for Settlement in NFG's 2022 base rate case, NFG contributes $92,000 of shareholder dollars to the fund annually.[159] NFG customers can also make voluntary contributions to the fund.[160]

Q: Is NFG proposing any changes to NFN in this case?

A: In the Company's initial filing, it did not propose any changes to NFN. But in response to discovery, NFG disclosed that it is evaluating certain changes to NFN on account of the program's current level of funding.[161] NFG proposes the following changes to NFN:

- Making both income AND a specified eligibility criterion necessary for hardship fund eligibility;
- Limiting NFN to only NFG customers; and
- Adding "flexibility to adjust the grant amount based on demand."[162]

[157] 2022-2026 USECP at 45.
[158] 2022-2026 USECP at 46-47.
[159] Pa. PUC v. NFG, Order, Docket Nos. R-2022-3035730, et al (Jun. 15, 2023); Pa. PUC v. NFG, Joint Petition for Approval of Settlement of Rate Proceeding, Docket No. R-202203035730 (Apr. 13, 2023) at ¶52; NFG Response to CAUSE-PA 2-22, Attachment. Attached hereto at Appendix B.
[160] 2022-2026 USECP at 45.
[161] NFG Response to CAUSE-PA 1-2. Attached hereto at Appendix B.
[162] NFG Response to CAUSE-PA 1-2. Attached hereto at Appendix B.

Q: Is the NFN being appropriately utilized to address low income household arrearages?

A: No. As discussed above, NFG's confirmed low income customers that are not enrolled in CAP comprise 9.6% of the Company's residential customers but hold 52% of residential dollars in debt and carry on average $198.93 more in debt than the average residential customer with debt.[163] As of January 2026, NFG reports that non-CAP confirmed low income customers carry a total of $4,107,714.03 in debt with an average debt burden of $614.56 each – though many individual customer debts exceed this level.[164] Further, NFG's low income customers also face terminations at disproportionate levels compared to residential customers as a whole, evidencing a substantial unmet need for emergency assistance to maintain gas service to their home. Confirmed low income customers were 43.4% of the residential customers whose service NFG terminated in 2025.[165]

If NFG's proposed rate increase is approved, the need for hardship fund assistance will grow as a result of the increased unaffordability of underlying rates. It is imperative that the Commission take steps to reform NFN to ensure it is adequately funded to meet the need for emergency assistance, at both existing and proposed rates.

Q: Do you have any other concerns about NFN?

A: Yes. I am concerned that NFG hardship funding is inadequate to meet the need for grant assistance amongst its low income customers. The level of NFG's available hardship funding has

[163] NFG Revised Response to CAUSE-PA 1-8, Attachment – Revised; NFG Revised Response to CAUSE-PA 1-26, Attachment - Revised. Both attached hereto at Appendix B.
[164] NFG Revised Response to CAUSE-PA 1-26, Attachment – Revised. Attached hereto at Appendix B.
[165] NFG Revised Response to CAUSE-PA 1-13, Attachment – Revised.

drastically declined over recent years with NFG reporting the following funding levels between 2023 and the end of 2025:[166]

- December 2023: $265,627.80
- December 2024: $250,376.67
- December 2025: $29,612.52

NFG reports that its hardship fund was depleted as of February 25, 2026.[167] To avoid suspending the program, NFG released its annual shareholder contribution of $92,000 early.[168] I am concerned, however, that the hardship fund will be depleted again soon, this time without another annual shareholder contribution available to rely on to avoid suspension of the Program. NFG's low income customers carry significant amounts of debt as a result of the underlying unaffordability of rates, with the total debt of confirmed low income customers (exclusive of CAP customers) totaling approximately $4,107,714 as of January 2026.[169]

I note that the amount of hardship fund grants distributed has increased over the past year, with total annual distributions more than doubling in 2025 over 2023 and 2024.[170] However, more must be done to bolster hardship funding to serve the unmet need for grant assistance amongst NFG's low income customers, particularly if NFG is permitted to increase its base rates. Additional funding for NFN is critical to ensure the program is able to meet the demonstrated need for emergency assistance.

[166] NFG Response to CAUSE-PA 2-21, Attachment. Attached hereto at Appendix B.
[167] NFG Response to CAUSE-PA 4-17. Attached hereto at Appendix B.
[168] NFG Response to CAUSE-PA 4-17. Attached hereto at Appendix B.
[169] NFG Revised Response to CAUSE-PA 1-26, Attachment - Revised. Attached hereto at Appendix B. This debt level excludes CAP debt because, as discussed, NFG does not appear to be able to track and report on certain debt levels carried by its CAP customers.
[170] NFG Response to CAUSE-PA 2-21, Attachment. Attached hereto at Appendix B.

Q: Do you have any concerns about NFG's proposed changes to NFN?

A: Yes. At the outset, I am concerned that NFG has not actually proposed these changes on the record, instead only revealing them in response to discovery. It is vital that any proposed change to a universal service program be made on the record in a Commission proceeding so that the parties of record have the ability to comment. Numerous unanswered questions about these proposals remain, and they must be evaluated more thoroughly after being proposed on the record. Solely for this reason, the Commission should not allow NFG's proposed changes to its hardship fund.

Notwithstanding these overarching concerns with NFG's proposals, I am concerned that NFG's approach to addressing the critically low level of available funding for NFN seems to be entirely reliant on restricting customer eligibility for emergency assistance. NFG's decision to release the annual shareholder contribution early to avoid suspending the program is only a temporary solution to a problem that is chronic and will recur without further intervention.

I am particularly concerned with NFG's proposal to require that households demonstrate both income eligibility and a specified eligibility criterion to receive hardship assistance. Low income households in NFG's service territory face substantial hardship affording their energy costs, including low income households that do not fit into one of NFG's listed criteria. NFG's proposal would require low income households to demonstrate a further hardship to qualify for emergency assistance and will result in many low income households being denied critical support through NFN. The increase in distributions from the hardship fund demonstrates the need for emergency assistance in NFG's service territory, and the solution to NFN's critically low level of funding must not be to restrict access to this vital resource to low income households.

I am also concerned about NFG's second proposal to eliminate eligibility for non-customer households. A non-customer may be a former NFG customer who has been terminated for more than 30 days and no longer fits the definition of "customer". For these households, an NFN grant is crucial to being able to reconnect and they should be grant eligible. NFN is a vital resource to assist these households with maintaining home heat, and eliminating access to the fund inevitably means that many of these households will be forced to go without. Grants to non-customers represented just 8% of dollars distributed through NFN in 2025.[171] These households are not creating the problem with NFN's funding level, and the solution should not be to eliminate their access to emergency assistance.

Finally, I am concerned that the flexibility to adjust grant amounts that NFG proposes will be operationalized to reduce grant assistance delivered to eligible households. NFG reports that this flexibility would allow the maximum grant amount to be reduced during periods of elevated demand or reduced fund balances.[172] Given that the NFN was just depleted and will likely be depleted again in the coming months, coupled with the precipitous rise in energy rates and corresponding rise in debts, I am seriously concerned that this flexibility to reduce grant amounts, without any plan to remediate the ongoing reduced fund balance, will result in permanently reduced NFN grant amounts to customers in need. NFG's hardship fund, as currently funded, is already inadequate to meet the need among its low income customers for emergency assistance. Further reducing grant funding will only exacerbate these issues.

[171] NFG Response to CAUSE-PA 4-20, Attachment; NFG Response to CAUSE-PA 2-21, Attachment. Both attached hereto at Appendix B.
[172] NFG Response to CAUSE-PA 4-19. Attached hereto at Appendix B.

Q: Do you have any recommendations regarding NFG's NFN Hardship Fund?

A; Yes. The Commission must require that NFG act to increase available funding for NFN. I recommend that the Commission require NFG to develop a plan to increase voluntary contributions to the hardship fund through fundraising. I also note that NFG's shareholder contribution to its hardship fund is below average compared to other Pennsylvania NGDCs. NFG contributes $0.47 per residential customer annually, compared to the average $0.69 per residential customer contributed by other Pennsylvania NGDCs.[173] I recommend that NFG, at minimum, double its contributions to the NFN fund, to a total public utility or shareholder contribution level of $184,000 annually. This increased level of NFN funding will help the program budget better meet the demonstrated existing need for emergency assistance in NFG's service territory and help to address the increased need that is sure to follow any potential rate increase.

I also recommend that the Commission reject the proposed changes to NFN that NFG disclosed through discovery. The Commission should not allow the Company to implement changes to a universal service program without requiring that the Company propose those changes on the record for all parties to evaluate.

V. PROPOSED RATE DESIGN

Q: Please briefly describe the aspects of NFG's residential rate design proposal that you intend to address.

A: NFG is proposing to maintain its current residential customer rate design of using a combination of volumetric usage rates and a fixed monthly charge.[174] Through this proceeding, NFG proposes to increase the volumetric usage charge for residential customers from 34.064¢ to

[173] 2024 Universal Service and Collections Report at 79, 80.
[174] NFG Exhibit F at 249.

38.233¢ per 100 cubic feet, an increase of 12.2%.[175] NFG also seeks to increase its fixed monthly residential customer charge from $14 to $19, an increase of $5 or 35.7%.[176] In addition, NFG proposes to make its Weather Normalization Adjustment (WNA) pilot into a permanent aspect of its rate design.

As I will discuss below, I am strongly opposed to NFG's proposal to substantially increase its fixed monthly charge for residential customers and to implement a permanent WNA, as each of these proposals would greatly exacerbate bill unaffordability for NFG's residential customers.

a. Fixed Customer Charge

Q: How would NFG's proposed increase to its fixed monthly residential charge impact low income households?

A: The level of increase to the fixed charge proposed by NFG will undermine the ability of consumers to control costs through energy efficiency, conservation, and consumption reduction, which is particularly problematic for low-income customers. These customers already struggle to pay for gas service and rely on offsetting high bills through careful conservation and usage reduction. When more of a customer's bill is tied to the fixed charge, less of it is dependent on their volumetric usage, and their ability to control costs by reducing usage is diminished. Increasing the fixed charge will prevent these vulnerable customers from being able to use conservation measures to mitigate the impact of the rate increase. Further, if the Commission allows NFG's WNA to continue in any form, the combination of the higher fixed charge and the WNA recovery would work together to doubly impair customers' ability to control costs through conservation and energy efficiency.

[175] NFG Exhibit F at 57, 249.
[176] NFG St. 14 at 17, Table 1.

Q: Would NFG's proposed increase to the fixed charge affect the Company's LIURP program and its proposed Energy Efficiency Pilot program?

A: Yes. NFG's proposal undermines the explicit goals of the Low Income Usage Reduction Program (LIURP). It will also reduce the benefits of NFG's proposed Energy Efficiency Pilot program (EE Pilot) by undermining the customer's ability to achieve bill savings through adoption of energy efficiency measures.

The Commission's LIURP regulations explicitly provide that the program is intended to help low income customers to reduce their *bills* – not just their usage – and, in turn, to "decrease the incidence and risk of customer payment delinquencies and the attendant utility costs associated with uncollectible accounts expense, collection costs and arrearage carrying costs."[177] By reducing the amount of bill savings that can be obtained through LIURP participation, the proposed increase to the fixed charge threatens the continued effectiveness of ratepayer investments intended to reduce energy consumption, delinquencies, collections, and uncollectible costs. The explicit goals of the Program will be more difficult to achieve as the fixed portion of the bill is increased.

LIURP is effective at achieving these goals and producing meaningful average bill savings. In 2024, the last year for which industry wide data is available, LIURP saved gas heating households an average of 13.8%, or $341.34 annually, on their gas bills.[178] NFG's LIURP reduces customer usage by approximately 18-20%.[179] The amount of bill savings that usage reduction results in depends on the portion of a customer's bill that is based on volumetric usage. The ability

[177] 52 Pa. Code § 58.1 ("The programs are intended to assist low income customers conserve energy and reduce residential energy bills. The reduction in energy bills should decrease the incidence and risk of customer payment delinquencies and the attendant utility costs associated with uncollectible accounts expense, collection costs and arrearage carrying costs.").

[178] 2024 Universal Service and Collections Report at 55.

[179] 2022-2026 USECP at 5.

to save money through energy efficiency is tied directly to a bill structure that bases costs on throughput. But as more residential customer costs are shifted to the fixed charge, the achievable bill savings – and the corresponding impact on bill payment behavior – will erode.

Given that low income households are disproportionately payment troubled,[180] and often lack the ability to reasonably control usage due to poor housing stock and older, less efficient appliances,[181] it is critical that they continue to have access to effective conservation tools capable of producing meaningful and lasting bill reductions. The ability to reduce bills through efficiency and conservation is even more critical for households with income above 150% FPL but less than 200% FPL who are ineligible for CAP or LIHEAP but are eligible for energy efficiency and conservation services through LIURP or the federal Weatherization Assistance Program (WAP) – both of which have income guidelines of up to 200% FPL. These households must retain the ability to reduce their monthly energy costs through adoption of comprehensive energy efficiency and conservation programming.

Likewise, customers who choose to take advantage of the company's proposed EE Pilot program will not experience the same level of bill savings from energy efficiency measures that they would experience if the full increase were placed on the volumetric charge. Thus, in addition to undermining the effectiveness of millions of dollars currently in LIURP investments, NFG's fixed charge proposal will also undermine the bill savings achievable through the millions of ratepayer dollars that the Company is proposing to invest in energy efficiency through its voluntary

[180] NFG Response to CAUSE-PA 1-8, Attachment; NFG Response to CAUSE-PA 1-21, Attachment. Both attached hereto at Appendix B.

[181] American Council for an Energy-Efficient Economy, Study: One in Four Low-Income Households Spend Over 15% of Income on Energy Bills (Sep. 11, 2024), available at: https://www.aceee.org/press-release/2024/09/study-one-four-low-income-households-spend-over-15-income-energy-bills; Nat'l Energy Assistance Directors' Ass'n (NEADA), Energy Hardship Report, at 16 (Aug. 2024), available at: https://neada.org/wp-content/uploads/2024/08/August-Summer-Hardship-Report-Final.pdf.

EE Pilot.[182] The rebates NFG proposes in its EE Pilot would not cover the full incremental cost of high efficiency equipment, so bill savings through usage reduction are necessary to make participation in the pilot financially viable for consumers.[183]

Q: Do you have any recommendations that could allow low income customers to mitigate the effect of the proposed rate increase through usage reduction measures?

A: Yes. NFG's fixed monthly customer charges should not be increased. To the extent any increase in the Company's residential distribution rate is approved, it should be applied to the volumetric charge. This would encourage usage reduction and conservation, protect the ability of low income households to lower their utility costs by reducing consumption, and preserve the effectiveness of LIURP at reducing customer bills and improving payment behavior.

b. Weather Normalization Adjustment (WNA) Proposal

Q: Please briefly describe NFG's WNA pilot.

A: Through the Commission Order approving the Joint Petition for Settlement in NFG's 2022 base rate case, NFG was authorized to implement a five-year WNA pilot.[184] The WNA is a bill adjustment that is applied to certain customer classes (including residential customers) from October through May[185] that attempts to break the link between the revenue collected through the volumetric rate and the effects of variation in temperature.[186] It works by using a concept called Heating Degree Days (HDD) to compare the actual weather conditions that occur with historical

[182] NFG St. 18 at 6: Table 2.
[183] NFG Response to CAUSE-PA 3-19. Attached hereto at Appendix B.
[184] Pa. PUC v. NFG, Order, Docket Nos. R-2022-3035730, et al (Jun. 15, 2023); Pa. PUC v. NFG, Joint Petition for Approval of Settlement of Rate Proceeding, Docket Nos. R-202203035730, et al (Apr. 13, 2023) at ¶41-43.
[185] Supplement No. 271 to Tariff Gas Pa. P.U.C. No. 9 at Eighth Revised Page No. 158; NFG St. 19 at 24:20-21, 25:1-3.
[186] NFG St. 19 at 29:15-16.

weather conditions, using a 15-year historical average to determine "normal" weather conditions.[187] The WNA is calculated by comparing Actual Heating Degree Days with Normal Heating Degree Days to determine the extent that weather conditions varied from historical weather conditions.[188] NFG's pilot WNA has a 3% deadband, which means that whenever temperatures deviate by more than 3% of normal weather, as determined by a 15-year weather history, NFG's WNA applies to bring customer bills more in line with what bill amounts would have been under normal weather conditions.[189] Under NFG's WNA, whenever temperatures are more than 3% warmer than normal, NFG customers are billed for the amount of gas they hypothetically *would have used* if weather had conformed to the normal pattern, not for the actual amount of gas they used.

Q: Please briefly describe NFG's proposals regarding its WNA in this case.

A: In this proceeding, NFG proposes to make its WNA pilot into a permanent feature of its rate design.[190] Besides making it permanent, the only other change NFG proposes to make to its WNA is to change the current 15-year historical weather average to a 10-year historical average based on weather recorded in Erie, Pennsylvania between 2015 and 2024.[191]

NFG points to the Commission's Order in Columbia Gas's 2025 base rate case, wherein the Commission directed Columbia to use a 10-year historical average for its WNA,[192] to support the Company's proposal to make its WNA permanent with a 10-year historical average.[193] But NFG overlooks the fact that in the same Order, the Commission refused Columbia's request to make its

[187] NFG St. 19 at 24:13-15.
[188] NFG St. 19 at 24:13-15.
[189] NFG St. 19 at 24:16-19.
[190] NFG St. 19 at 23:6-10.
:[191] NFG St. 19 at 25:5-8; NFG St. 13 at 7-11, 9:6-8.
[192] Pa. PUC v. Columbia Gas of Pennsylvania, Opinion and Order, Docket Nos. R-2025-3053499, et al, at 302 (Dec. 4, 2025).
[193] NFG St. 13 at 8:16-22.

WNA permanent, allowing it to continue only on a pilot basis and subject to the implementation of other consumer protections.[194] These included a 5% deadband and restricting Columbia's WNA to the months of November through April.[195] NFG proposes a permanent WNA with a 3% deadband running from October through May – more than half the year – flatly out of step with the WNA pilot authorized through Commission's Order in the Columbia rate case.[196]

As I will discuss, the Commission should not allow NFG to continue its WNA in any form, and certainly not with the design that NFG has imposed on customers through its pilot. In practice, NFG's WNA improperly shifts the risk of changing weather from NFG to its customers, and largely has resulted in higher charges for residential customers.

Q: What are your concerns about NFG's proposal to make its WNA permanent?

A: I have several concerns about NFG's WNA and its proposal to make it permanent. First, NFG purports that its WNA works in both directions, protecting the utility from reduced revenue due to warmer weather while also protecting consumers from higher bills due to colder weather.[197] In actuality, the WNA more often, and to a greater magnitude, works to the benefit of NFG. Even with the cold winter Pennsylvania experienced in 2025-2026, from the time when NFG's WNA pilot took effect in October 2023 through February 2026, the WNA has resulted in over $4.4 million in net additional customer charges for NFG's residential customers.[198] The WNA imposed

[194] Pa. PUC v. Columbia Gas of Pennsylvania, Opinion and Order, Docket Nos. R-2025-3053499, et al, at 301 (Dec. 4, 2025).
[195] Pa. PUC v. Columbia Gas of Pennsylvania, Opinion and Order, Docket Nos. R-2025-3053499, et al, at 301-302 (Dec. 4, 2025).
[196] NFG St. 19 at 24:16-19, 25:1-3.
[197] NFG St. 19 at 26:7-9.
[198] NFG Response to OCA IX-38, Attachment. Attached hereto at Appendix B. The WNA has resulted in a net total of $4,443,004.96 in additional residential customer charges from October 2023 through February 2026.

nearly $2.2. million in additional charges on residential customers' bills in the 2024-2025 season alone.[199]

Importantly, weather conditions are undergoing a persistent, long-term warming trend that results in fewer Heating Degree Days over time. The Pennsylvania Department of Environmental Protection (DEP) reports that temperatures are rising and will continue to rise steadily in Pennsylvania.[200] DEP reports that although temperatures will continue to vary year-by-year, Pennsylvania's average annual temperature has already risen by approximately 1.2 degrees Fahrenheit from 2000 to 2023 and projects that average annual temperatures will rise by another 6.7 degrees Fahrenheit by mid-century.[201] The Figure provided by NFG witness John D. Taylor depicts this warming trend: the data NFG provided shows that the number of Heating Degree Days has consistently trended downward from 1975 to present and shows that this warming trend is projected to continue.[202] This warming trend means that even as annual temperatures vary year by year, the WNA, if the Commission allows it to continue, will produce greater and greater revenue for NFG, *for gas service that customers will not actually use or need*. As discussed above, low income customers have no margin to spend more on energy costs, especially for the cost of gas they did not even use. Low income customers struggle to afford service and need to retain every ability to realize bill savings due to reduced usage, even reduced usage due to changing weather patterns. Even with variations in weather year over year, the WNA works to the net harm of consumers. The fact that it worked to benefit consumers this past winter does not negate the harm it caused in years prior, or the harm it will cause in future years.

[199] NFG Response to OCA IX-38, Attachment. Attached hereto at Appendix B. The WNA resulted in additional charges of $2,195,301.72 in additional residential customer charges from October 2024 through May 2026.
[200] Pa. Dep't of Environmental Protection, Pennsylvania Climate Impacts Assessment 2024 (Apr. 2025) at 12.
[201] Pa. Dep't of Environmental Protection, Pennsylvania Climate Impacts Assessment 2024 (Apr. 2025) at 12.
[202] NFG St. 19 at 26: Figure 1.

I am also concerned that NFG's WNA, by breaking the link between a customer's usage and their bill amount, discourages conservation and usage reduction, and undermines the goals of LIURP. As discussed above, the ability for usage reduction to result in bill savings depends on bill amounts being based on customer usage. While customers who participate in LIURP would still benefit from reduced supply costs, the WNA essentially takes back the savings these customers could have otherwise achieved in the volumetric portion of their distribution bill. The effect is that customers may become increasingly indifferent to whether they are charged for energy they use or charged for energy that they do not use but "should have used" under the WNA. This may create an incentive under the WNA to waste energy in warmer than normal months because customers are going to be charged for energy whether they use it or not.

Further, the WNA requires an overly complicated and nuanced calculation that is difficult for consumers to understand because it charges customers not for their actual usage, but for hypothetical usage. The WNA is confusing and impairs customers' ability to understand their charges, and therefore, to make changes to control their usage and bills. For low income customers, this exacerbates affordability challenges and undermines a critical tool for achieving bill savings.

Q: Do you agree with NFG Witness John D. Taylor's assertion that the Company's WNA proposal aligns with the fourteen factors that the Commission outlines in its alternative ratemaking Statement of Policy?

A: No. Mr. Taylor provided an exhibit, Exhibit JDT-3, in which he discusses the Company's WNA in relation to the fourteen factors that the Commission set out in its Statement of Policy for

alternative ratemaking mechanisms at Docket No. M-2015-2518883.[203] I respond to each of his assertions in turn in Exhibit Geller C-2.[204]

Q: What is your overall recommendation about NFG's proposal to make its WNA permanent?

A: I recommend that the Commission end NFG's WNA pilot and that it should not be made permanent. There should be no further collection of the WNA with the effective date of rates in this proceeding. NFG's WNA is designed to stabilize its revenue fluctuations caused by variations in weather, but it does so by undermining energy efficiency and disproportionately burdening low income customers, raising deep concerns about fairness and equity. While this mechanism protects NFG from revenue volatility, it transfers the financial risk of warmer weather onto customers who may have already reduced their consumption to manage tight household budgets. For low income households, which often face difficult choices between heating, food, and other essentials, these additional charges undermine their ability to plan for and manage utility expenses effectively. The WNA introduces a variable that makes it more challenging for vulnerable households to manage their limited resources effectively.

Q: If NFG is allowed to continue the WNA, should it be reformed?

A: Yes. My primary recommendation is that the Commission eliminate the WNA in its entirety. However, if the WNA is not eliminated it should be reformed as follows.

The WNA should remain a pilot for a limited period, no longer than three years, and should not be made permanent. Each of the recommendations I make below should be incorporated into any WNA pilot that is permitted to continue.

[203] NFG St. 19 at 27:23, 28:1-5; NFG Exhibit JDT-3; See Also Final Policy Statement Order, Fixed Utility Distribution Rates Policy Statement (Jul. 11, 2019) at Docket No. M-2015-2518883.
[204] See CAUSE-PA St. 1, Ex. Geller C-2.

All customers enrolled in NFG's CAP should be exempt from the WNA charge. CAP customers who are enrolled in NFG's PIP rate do not pay these charges directly because their bills are capped at their percentage of income bills; however, for CAP customers paying the average bill amount, the WNA unreasonably increases these customers' CAP bills. In addition, because CAP customers do not pay their full tariff bill, imposing the WNA on CAP customers' bills needlessly increases the costs of the CAP program paid for by other residential customers.

The months in which the WNA is operable should be limited to the period from December through March. These are the winter months recognized by the Commission, the General Assembly, and other state agencies to fulfill or advance other public policy purposes such as dissemination of LIHEAP assistance to households with income at or below 150% FPL and winter termination rules that prevent termination of heat-related service to households with income at or below 250% FPL. If these are the only months that economically vulnerable households must retain service because of the possibility of cold weather, it is unreasonable to allow NFG to assess a weather-related charge in the additional months of October, November, April, and May.

The deadband should be increased to 5% rather than the current 3%. This will prevent the WNA from applying when only minor deviations from the historical average temperature occur. This would also bring the WNA in alignment with the standards which were recently permitted to continue in the Columbia Gas 2025 rate proceeding and would produce fewer months where the WNA would produce charges or credits.

Additionally, NFG should be required to use a rolling ten-year historical average that is updated annually to calculate any WNA that is permitted to continue so that any WNA is calculated based on the most recent ten years of weather, rather than the fixed period from 2015 to 2024.

That said, I reiterate that my primary recommendation is that the Commission eliminate the WNA in its entirety.

VI. TARIFF RIDER PROPOSALS

Q: Please briefly describe NFG's tariff rider proposals that you intend to address in the context of this testimony.

A: NFG has put forth two tariff rider proposals that I will address in this Section of my testimony. First, NFG proposes an energy efficiency pilot program (EE Pilot), the costs for which it proposes to collect from residential customers through a new rider.[205] Second, NFG proposes to distribute a one-time $30 bill credit to the Company's CAP customers and customers with income at or below 250% FPL.[206]

a. Proposed Energy Efficiency Pilot Program (EE Pilot)

Q: Please briefly describe the Energy Efficiency Pilot Program that NFG proposes.

A: In this proceeding, NFG is proposing to implement a five-year energy efficiency pilot program (EE Pilot) that would provide rebates to residential customers for purchasing high-efficiency gas appliances.[207] The pilot would include rebates ranging from $150 to $700 for space heating equipment, $50 to $300 for water heating equipment, and $100 for gas clothes dryers.[208] NFG projects the total cost of the program to be $3,721,313 over five years.[209] The Company proposes to recover the costs for the program from a new rider, Rider D, which would recover an additional $0.7 million from residential customers annually, on top of the $19.7 million revenue

[205] NFG St. 1 at 6:5-6.
[206] NFG St. 14 at 14:6-7; NFG Response to CAUSE-PA 4-27. Attached hereto at Appendix B.
[207] NFG St. 18 at 5:1-3.
[208] NFG St. 18 at 5:5-15.
[209] NFG Response to CAUSE-PA 3-21. Attached hereto at Appendix B.

increase NFG requests in this case.[210] All residential customers, including CLI and CAP customers, would be charged this rider.[211]

Q: Does NFG's proposed EE Pilot include programming designed to reach low income customers?

A: No. As proposed, NFG's EE Pilot will be inaccessible to low income customers. The Company purports that the EE Pilot would be "a fair and practical solution to support low-income customers while advancing energy efficiency goals."[212] However, NFG does not address how low income customers – who most often lack the discretionary income to take advantage of rebate programs – could meaningfully participate in the EE Pilot. Reliance of the program on rebate incentives and the inelasticity of household income for those living in poverty means that low income customers would be unable to purchase high efficiency heating appliances such as furnaces and boilers, be eligible for rebates, or otherwise meaningfully participate or derive any comprehensive or quantifiable energy or bill savings through the proposed EE Pilot.

Importantly, the rebates NFG proposes to offer through its EE Pilot would not even cover the full incremental cost of purchasing high-efficiency equipment over baseline equipment.[213] It is unrealistic to expect that a low income customer facing a heating emergency who does not qualify for ERRP based on usage could bear even a portion of the incremental cost to purchase high-efficiency equipment eligible for EE Pilot rebates rather than baseline equipment to resolve a heating emergency. As discussed above, these customers are already forced to make impossible choices between paying for energy costs, food, medicine, and other essential expenses. NFG's low

[210] NFG St. 1 at 6:5-6.
[211] NFG Response to CAUSE-PA 3-17. Attached hereto at Appendix B.
[212] NFG St. 18 at 10:16-18.
[213] NFG Response to CAUSE-PA 3-19. Attached hereto at Appendix B.

income customers have no margin to bear any portion of the incremental cost of high-efficiency equipment, let alone to bear the full cost of high-efficiency equipment while waiting for a rebate, and are effectively locked out of participating in the EE Pilot. NFG reports that it has not conducted any analysis regarding the ability of low income households to participate in the EE Pilot.[214]

Nevertheless, despite being effectively foreclosed from realistically participating in the EE Pilot, low income customers, including CAP customers, would be charged NFG's Rider D to support the program through their monthly bills.[215] As proposed, the Company would be implementing an energy efficiency program that will not reach low income customers who are most burdened by higher rates and are least able to afford to adopt energy efficiency measures on their own. Low income customers, who already pay a disproportionate share of their incomes for energy costs, will receive no relief through the voluntary energy efficiency program presently proposed by the Company - but will still be required to pay the added cost of the Company's EE programs through rates. It is unjust and unreasonable to force financially struggling customers to pay for a program from which they are unable to meaningfully participate or derive any quantifiable benefit.

NFG's total lack of targeted low-income measures in its proposed EE Pilot program stands in stark contrast to the Commission's established requirements for the Electric Distribution Company (EDC) Act 129 energy efficiency portfolios. While NFG is a gas distribution company and, as such, is not subject to Act 129, the law does provide a rubric for how voluntary, ratepayer supported energy efficiency programming *should* be structured to ensure equitable access to efficiency services. Under Act 129, electric distribution companies (EDCs) are required to

[214] NFG Response to CAUSE-PA 3-20. Attached hereto at Appendix B.
[215] NFG Response to CAUSE-PA 3-17. Attached hereto at Appendix B.

implement Act 129 low income programs in addition to existing LIURP programs, which makes sense given that the eligibility criteria are different for the Act 129 low income programs and LIURP, which requires customers to meet a minimum usage threshold to participate. In contrast, the EDC's Act 129 low-income programs are intended to be broadly available to all income-eligible customers. This is an important distinction, because even low-income customers with average energy bills face enormous challenges with energy affordability. In the absence of specific and targeted Act 129 low-income programs, low income customers that do not meet the high usage threshold for LIURP would be unable to access any efficiency program support from the EDCs. Unfortunately, this is the exact scenario presented by NFG's energy efficiency program proposal, in which only high-use low-income customers will have access to efficiency support through NFG's LIURP program – while non-low income households with any usage level will have access to efficiency programs financed through rates because they can afford to pay the upfront cost of the measures and apply for the rebates.

Q: Do you have any other concerns about the proposed EE Pilot Program?

A: Yes. I am concerned that NFG's EE Pilot Program, if implemented, would not be appropriately coordinated with its existing Emergency Repair and Replacement Program (ERRP). As discussed above, NFG's ERRP is a component of its LIURP that provides LIURP-eligible customers with emergency repair and replacement of home heating and hot water equipment.[216]

NFG explained that the EE Pilot Program is "intended to complement and coordinate with" existing low income assistance programs administered by NFG and other programs.[217] NFG states that it "intends to leverage its existing Emergency Repair and Replacement Program ("ERRP") to

[216] 2022-2026 USECP at 5.
[217] NFG Response to CAUSE-PA 3-20. Attached hereto at Appendix B.

further assist self-identified low-income customers who report being without heat," and that by "integrating ERRP with the EE Program, the Company can remove one of the most significant barriers to participation, the upfront cost of high efficiency appliances, while ensuring vulnerable households maintain safe and reliable heating."[218] But in response to discovery, NFG clarified that customers reporting a loss of heating would first be evaluated for ERRP eligibility, through which they could get emergency heating equipment repairs and replacement, and that customers who are ineligible for ERRP would be referred to the EE pilot for a rebate.[219] That is, the EE Pilot rebate would not "stack" with ERRP to facilitate high-efficiency gas equipment replacements for ERRP-eligible low income customers facing heating emergencies. It is not apparent how ERRP would be integrated with the EE Program to assist low income customers in overcoming the high upfront cost of high efficiency appliances if only those customers ineligible for ERRP would be referred to the EE Program.

Q: Do you have recommendations for how NFG can adjust its EE Pilot Program so that it is accessible and provides meaningful assistance to low income customers?

A: Yes. I recommend the Commission require NFG to revise its proposed EE Pilot Program to include a targeted low income energy efficiency program designed to serve the unique needs and financial circumstances of customers whose annual household income is equal to or less than 200% of FPL. The Commission should require that NFG, in coordination with the USAC, develop a low income subprogram as part of its EE Pilot Program within 90 days of the effective date of rates in this proceeding and that the subprogram contain the minimum elements I recommend here.

The low income subprogram should be complimentary to NFG's LIURP, providing services to low income households that are otherwise ineligible for LIURP. Given that the

[218] NFG St. 18 at 10:22, 11:1-5.
[219] NFG Response to CAUSE-PA 3-22. Attached hereto at Appendix B.

inelasticity of low income household budgets makes it difficult or impossible for them to participate in rebate programs, the low income subprogram should provide participants with prescriptive efficiency measures and direct installation at no cost. In designing a low income customer program within its EE Pilot program, NFG should target low income customers who are ineligible for LIURP because they do not meet the minimum usage threshold. Low income programming within NFG's proposed EE Pilot should also specifically target measures to low income residential tenants, who are often unable to access comprehensive energy efficiency programming due to landlord noncooperation. Applicants who are income eligible for LIURP but are denied because they do not meet the minimum usage threshold should be provided a warm referral to the EE Pilot program administrator.

I also recommend that NFG be required to track certain data related to participation of low income customers in the proposed EE Pilot, if approved. I recommend that the Commission require NFG to track the number of low income customers that have participated in the proposed EE Pilot by FPL range, the average usage reduction and bill savings for participating low income households as a result of measures received through the program, and whether participating low income customers were referred to other universal service and energy conservation programs.

Q: Are there ways that NFG can better coordinate its proposed EE Pilot Program with its LIURP program and other available assistance programs?

A: Yes. As part of the development of the low income subprogram of the proposed EE Pilot Program as discussed above, NFG should be required to set forth a plan for integrating the low income EE subprogram, LIURP, and other energy efficiency and weatherization assistance programs available across NFG's service territory through customer referrals and enhanced coordination of service delivery. This should include but not be limited to appropriate referrals to

FirstEnergy's LIURP and Act 129 programs and the federal Weatherization Assistance Program. NFG should seek to enhance partnerships with program administrators to streamline service delivery to low income households through coordinated measure installation.

I further recommend that NFG be required to screen all applicants to the EE Pilot Program for household income as part of the application process. Low income customers seeking information about the EE Pilot program should first be screened for eligibility for NFG's LIURP and other universal service programs to ensure they are connected to the most advantageous assistance programs available. Consumers do not typically volunteer information about their household income unless prompted. While customers may wish to opt out of providing income information when asked, NFG should nevertheless request income information to first determine whether they are eligible for more extensive services through LIURP or NFG's other available universal service programs before vetting the household for services through the EE Pilot program. By implementing a basic screening and referral process, NFG can help ensure that low income customers are identified and referred to programs that will provide the most comprehensive benefits available to serve their needs.

Finally, I recommend that NFG develop outreach materials designed to co-market the EE Pilot Program, if approved, with other energy efficiency programming available across NFG's service territory. Again, this includes at minimum NFG's LIURP, as well as LIURP and Act 129 programs offered by FirstEnergy; and the federal Weatherization Assistance Program. These comarketing materials should be available in, at minimum, English and Spanish. I recommend that NFG be required to consult with its USAC to help ensure that the language and dissemination of these outreach materials reasonably inform customers about the availability and process for

applying for NFG's energy efficiency programs, including the proposed EE Pilot Program, and that these materials be finalized within 90 days of the effective date of rates in this proceeding.

b. Other Post-Employment Benefit (OPEB) Credit

Q: Please describe NFG's proposal regarding its plan to return revenue collected for Other Post-Employment Benefits (OPEB) to ratepayers.

A: NFG proposes to return approximately $7.2 million to ratepayers that it previously collected to fund Other Post-Employment Benefits, which it discontinued in 2003.[220] Through proceedings in 2021, the Commission approved NFG's petition to return $54 million of OPEB funds to customers through Rider I.[221] $7.2 million of that amount remains in NFG's possession, and the Company proposes to return it to customers through two mechanisms. First, it will provide a one-time $30 bill credit to CAP customers and customers with verified income at or below 250% FPL.[222] This credit is expected to total approximately $1.025 million.[223] NFG reports that the credit would be distributed only to those customers for whom the Company has recorded income information indicating that the household has income at or below 250% of the FPL.[224] After this one-time credit is distributed, the remaining funds would be returned to ratepayers through Rider I for one year.[225] In this section of my testimony, I address NFG's proposal to provide a one-time bill credit of $30 to CAP and verified low to moderate income customers.

Q: Do you have any recommendations regarding NFG's one-time bill credit proposal?

A: Yes. I am generally supportive of NFG's proposal to provide a one-time bill credit to CAP and low to moderate income customers. I note that NFG indicated in response to discovery that

[220] NFG St. 14 at 14:2-11; NFG St. 5 at 5:6-16.
[221] NFG St. 14 at 13:8-11.
[222] NFG St. 14 at 14:6-7; NFG Response to CAUSE-PA 4-27. Attached hereto at Appendix B.
[223] NFG St. 14 at 14:7.
[224] NFG Response to CAUSE-PA 4-27. Attached hereto at Appendix B.
[225] NFG St. 14 at 14:7-9.

for CAP customers receiving the credit, it would be applied to the ask-to-pay side of a customer's bill, would not be applied to pre-program arrearages, and that the credit would count as a payment toward CAP arrearage forgiveness.[226] I support these aspects of the proposal as they would help to maximize the credit's efficacy as rate relief for CAP customers. However, I believe that additional changes to this proposal are necessary to ensure that the credit is implemented in an appropriate manner.

The Commission should require that NFG conduct affirmative outreach by mail, email, telephone call, and text message to all customers receiving the one-time credit to screen for potential eligibility for CAP and/or NFG's other universal service programs. Mailed outreach should include a CAP application and an overview of the CAP program. Email and text message outreach should include links to NFG's online CAP application. For customers contacted by phone who express interest in CAP or other universal service programs, a warm referral should be made to the appropriate program coordinator.

Further, NFG should be required to distribute the one-time bill credit during a winter month, between December to March, when home heating costs are highest. NFG indicates that it intends to distribute the credit as soon as reasonably possible after a Commission order in this proceeding, with a goal to issue the credit in the November 2026 billing cycle.[227] Instead, NFG should be required to target posting the credit in a winter month – between December and March – to maximize the ability of the credit to provide relief to low income customers when the need for assistance is greatest.

[226] NFG Response to CAUSE-PA 4-28. Attached hereto at Appendix B.
[227] NFG Response to CAUSE-PA 4-26. Attached hereto at Appendix B.

VII. PROPOSED AMENDMENTS TO TARIFF RULE 8

Q: Please briefly NFG's Tariff Rule 8 and the changes it proposes to the rule.

A: NFG's Tariff Rule 8, "Access to Premises," provides that the Company's authorized agents shall have free access, at all reasonable times, to customer premises for the purpose of accessing gas equipment belonging to the Company, and piping and appliances belonging to the customer.[228] In this rate proceeding, NFG proposes to add language to Tariff Rule 8 that would expand the definition of "free access" to mean that Company personnel will not be subject to unsafe or hazardous conditions while on the premises, which it defines broadly to include the presence of insect or rodent infestation, excrement, debris, or other rubbish, or "any other circumstance that may reasonably pose a threat to the health or safety of Company employees or agents."[229]

Q: Do you have any concerns about the language NFG proposes to add to Tariff Rule 8?

A: Yes. It is necessary and imperative that NFG personnel can access gas equipment on customer premises, and the safety of NFG's employees is of paramount importance. However, I am concerned about the subjective nature of the language NFG proposes to add to its tariff.

Under its current and proposed tariff, NFG may refuse or terminate service for noncompliance with the tariff's rules, including Rule 8.[230] I am concerned that explicitly characterizing the subjective presence of pests, debris, "rubbish" or other health and safety issues as within the scope of denying free access to customer premises could result in customers having service refused or terminated based on the presence of both real or perceived health and safety issues that may not, in fact, pose any threat to the employee – but may instead be a subjective moral or cultural difference. NFG has already developed protocols for its employees to handle

[228] National Fuel Gas Distribution Corporation Tariff Pa. P.U.C. No. 9, Original Page No. 19.
[229] NFG St. 16 at 29:9-18.
[230] NFG Response to CAUSE-PA 4-9. Attached hereto at Appendix B.

these situations when encountered in the course of their work and does not permit its employees to enter customer premises if health and safety concerns are present. Specifically, NFG reports that it maintains a Safety Gatekeeper Program that enables NFG employees to report concerns about customer wellbeing or unsafe conditions encountered in the field.[231] NFG currently requires that health and safety issues present at customer premises, such as unsanitary conditions, pest infestations, or debris be remediated before employees are permitted to enter to perform work.[232] The Company reports that if an employee believes that a customer needs assistance, the employee can report their concern to their supervisor, who will determine whether referring the customer to resources or support services is warranted.[233]

It is not clear that the addition of this language to the tariff would provide any additional protection to employees beyond the protocols NFG has already implemented, but it comes at the risk of potentially subjecting customers to refusal or denial of service for conditions that they may not be able to remediate without assistance. In addition, the proposed language is highly subjective and would make it difficult for the Commission and interested stakeholders to evaluate whether NFG is performing service terminations in compliance with regulatory and statutory requirements. I recommend that the Commission not approve NFG's request to add this language to its tariff.

[231] NFG Response to CAUSE-PA 4-11. Attached hereto at Appendix B.
[232] NFG Response to CAUSE-PA 4-11. Attached hereto at Appendix B.
[233] NFG Response to CAUSE-PA 4-11. Attached hereto at Appendix B.

VIII. SUMMARY AND CONCLUSION

Q: Please summarize your recommendations.

A: I made several recommendations throughout my testimony to address current levels of unaffordability and to mitigate the financial impact of any approved rate increase on low income households. In summary, I recommend the Commission take the following actions:

Identification of Low Income Customers

- Require that NFG begin screening all new and moving customers for income level at the time their service is established and once annually thereafter, and routinely screen for income on any non-emergency calls.

CAP Enrollment

- Improve the CAP recertification process to include an online recertification option, include a self-addressed stamped envelope with mailed CAP recertification forms, and expand recertification outreach to include email and text messages.
- Require that NFG expand and improve its outreach to customers who have elected to share LIHEAP data with the Company but who are not enrolled in CAP to include mail, email, telephone call, and text message outreach and implement a more simplified enrollment process.
- Require that NFG use the LIHEAP data it receives to recertify CAP eligibility for all CAP customers participating in LIHEAP data sharing regardless whether the customer is due to recertify eligibility.
- Require that NFG establish benchmarking goals to increase CAP enrollment by a minimum of 5% of its estimated low income population each year.
- Require that NFG track and report to its USAC data regarding applications and recertifications.
- Require that NFG track and report data regarding the total number of CAP accounts with arrears, the total dollar amount in debt for CAP customers, and the average amount of debt for CAP customers
- Commence an audit of NFG's collections and universal service program reporting to assess the need for additional corrective actions.

LIURP Participation

- Require NFG to develop a written comprehensive plan to expend its full LIURP budget each year, including discussion of customer outreach and referral streams, to be filed at NFG's USECP docket within 90 days of the effective date of rates in this proceeding.
- Require that NFG expand LIURP eligibility to customers living in mobile homes.

NFN Hardship Fund

- Reject NFG's off-the-record proposals to restrict NFN eligibility and add flexibility to adjust grant amounts.

- Require NFG to develop a plan to increase voluntary contributions to the hardship fund through fundraising and its annual shareholder contribution to the fund.

Fixed Customer Charge

- Reject NFG's proposal to increase the fixed customer charge, and instead apply any approved rate increase to the volumetric charge.

WNA Proposal

- End the WNA pilot and reject the Company's proposal to make it permanent.
- If any WNA is allowed to continue, require that it be on a pilot basis, that all CAP customers be exempt from the WNA charge, that the operable months be reduced to the winter months of December through March, that the deadband be increased to 5%, and that NFG use a rolling 10-year historical weather average that is updated annually.

EE Pilot Proposal

- Require NFG to revise its EE Pilot Program to include a low income energy efficiency subprogram that provides no-cost EE measures and is targeted to low income customers who are ineligible for LIURP.
- Require that NFG track data related to low income customer participation in the EE Pilot.
- Require that NFG set forth a plan for integrating the EE Pilot Program, LIURP, and other available energy efficiency and weatherization assistance programs available across NFG's service territory through customer referrals.
- Require that NFG inquire as to the income status of all EE Pilot applicants.
- Require that NFG develop outreach materials designed to co-market the EE Pilot, if approved, with other energy efficiency programming available across NFG's service territory.

One-Time OPEB Refund Credit

- Require that NFG conduct affirmative outreach by mail, email, telephone call, and text message to all customers receiving the credit to screen for potential eligibility for CAP and/or NFG's other universal service programs.
- Require that NFG distribute the one-time bill credit during a winter month, between December to March.

Tariff Rule 8 Amendment

- Reject NFG's request to add the proposed language to Tariff Rule 8.

Q: Does this conclude your direct testimony?

A: Yes.

CAUSE-PA St. 1, Geller

Appendix A

Resume – Harry S. Geller, Esq.

RESUME OF HARRY S. GELLER

EDUCATIONAL BACKGROUND:
Harpur College, State University of New York at Binghamton, B.A. 1966
Washington College of Law, American University, J.D. 1969
New York University Law School, courses in Urban Affairs and Poverty Law, as part of Volunteers in Service to America (VISTA) Program 1969-1971

EMPLOYMENT:
1988- 2015 Executive Director, Pennsylvania Utility Law Project (PULP), a project of the civil non-profit Pennsylvania Legal Aid Network. PULP is dedicated to providing technical support, information sharing, and representation to low-income individuals and organizations, assisting and advocating for the low income in utility and energy matters. Responsibilities include project oversight, case consultation, co-counseling, and participation on task forces, work groups and advisory panels, community education and training in utility and energy matters affecting the low income.

While at PULP, served in the following capacities:

- Chairman, Low-Income Home Energy Assistance Program (LIHEAP) Advisory Committee to the Secretary, Pennsylvania Department of Human Services
- Member, Pennsylvania Public Utility Commission, Consumer Advisory Council Coordinator, Pennsylvania Legal Services Utility/Energy Work Groups
- Member, Weatherization Policy Advisory Committee to the Department of Community and Economic Development
- Member, PECO Universal Service Advisory Committee and LIURP Subcommittee

1974-1987 Staff Attorney, Managing Attorney and ultimately, Executive Director of Legal Services, Incorporated (LSI), a civil legal services program serving Adams, Cumberland, Franklin and Fulton Counties. Through a restructuring with other legal services programs, LSI became part of what is now known as MidPenn Legal Services and Franklin County Legal Services.

1971-1972 Staff Attorney, New York City Legal Aid Society, Criminal Court and Supreme Court Branches, New York County.

1969-1971 Volunteer in Service to America (VISTA) assigned to the New York University Law School Project on Urban Affairs and Poverty Law.

BAR ADMISSIONS - Retired
New York State
Commonwealth of Pennsylvania
United States District Court, Middle District of Pennsylvania

Cases in which Harry S. Geller has participated as a witness before the Pennsylvania Public Utility Commission since July 1, 2015

Pennsylvania Public Utility Commission v. PA American Water Company, Docket Nos. R-2025-3057983 (Water); R-2025-3058051 (Wastewater)
Pennsylvania Public Utility Commission v. Columbia Gas of Pa., Docket No. R-2025-3053499
Pennsylvania Public Utility Commission v. UGI Utilities, Inc. - Gas Division, Docket No. R-2024-305276
Pennsylvania Public Utility Commission v. Aqua Pennsylvania Inc., Aqua Pennsylvania Wastewater, Inc., Docket Nos. R-2024-3047822; R-2024-3047824.
Pennsylvania Public Utility Commission v. FirstEnergy Pennsylvania Electric Company, Docket No. R-2024-3047068
Pennsylvania Public Utility Commission v. Duquesne Light Company, Docket No. R-2024-3046523
Petition of PPL Electric Utilities Corp. for Approval of DSP for Period of June 1, 2025 through May 31, 2029, Docket No. P-2024-3047290
Pennsylvania Public Utility Commission v. Peoples Natural Gas Company, LLC, Docket No. R-2023-3044549
Pennsylvania Public Utility Commission v. PGW, Docket No. R-2023-3037933.
Pennsylvania Public Utility Commission v. PWSA, Docket Nos. R-2023-3039920; R-2023-3039921; R-2023-3039919
Pennsylvania Public Utility Commission v. PA American Water Company, Docket Nos. R-2023-3043189; R-2023-3043190
Pennsylvania Public Utility Commission v. Peoples Natural Gas Co. LLC, Docket No. R-2023-3044549
Petition of PPL Electric Utilities Corp. for Approval of DSP for Period of June 1, 2025 through May 31, 2029, Docket No. P-2024-3047290
Pennsylvania Public Utility Commission v. Philadelphia Gas Works, R-2022-3034229, P-2022-3034264
Pennsylvania Public Utility Commission v. National Fuel Gas Distribution Corporation, R-2022-3035730
Pennsylvania Public Utility Commission v. Columbia Gas of Pa., Docket No. R-2022-3031211
Pennsylvania Public Utility Commission v. Pa. American Water Co., Docket Nos. R-2022-3031672 & -3031673
Pennsylvania Public Utility Commission v. UGI Utilities, Inc.-Gas Division, R-2021- 3030218.
Joint Petition of MetEd, Penelec, Penn Power, and West Penn Power for Approval of their Default Service Programs for the Period Commencing June 1, 2023 through May 31, 2027, Docket Nos. P-2021-3030012, -13, -14, -21

Pennsylvania Public Utility Commission v. Aqua Pennsylvania, Inc. and Aqua Pennsylvania Wastewater, Inc., Docket Nos. R-2021-3027385, R- 2021-3027386.
Pennsylvania Public Utility Commission v. Pittsburgh Water and Sewer Authority, R-2021-3024773, R-2021-3024774, R-2021-3024779.
Pennsylvania Public Utility Commission v. Duquesne Light Company, R-2021- 3024750.
Pennsylvania Public Utility Commission v. PECO Energy-Electric Division, R-2021-3024601.
Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc., R-2021-3024296.
Tenant Union Representative Network v. PECO Energy Company, C-2020-3021557
Pennsylvania Public Utility Commission v. Philadelphia Gas Works, R-2020-3017206.
Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program for the Period of June 1, 2021 through May 31, 2025, Docket No. P-2020-3019356.
Petition of PECO Energy Company for Approval of Its Default Service Program for the Period from June 1, 2021 through May 31, 2025, Docket No. P-2020-3019290.
Petition of Duquesne Light Company For Approval of Default Service Plan For The Period June 1, 2021 Through May 31, 2025, Docket No. P-2020-3019522.
Joint Application of Aqua America, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC for all of the Authority and Necessary Certificates of Public Convenience to Approve a Change in Control of Peoples Natural Gas Company LLC, and Peoples Gas Company LLC by way of the Purchase of all of LDC Funding LLC's Membership Interests by Aqua America, Inc., Docket Nos. A-2018-3006061, A-2018-3006062, A-2018-3006063.
Pennsylvania Public Utility Commission v. Aqua Pennsylvania, Inc. et al. Docket Nos. R-2018-3003558 et seq.
Pennsylvania Public Utility Commission v. Duquesne Light Company, Docket No. R-2018-3000124.
Pennsylvania Public Utility Commission v. PECO Energy Company- Electric Division, Docket No. R-2018-3000164.
Joint Petition of MetEd, Penelec, Penn Power, and West Penn Power for Approval of their Default Service Programs for the period commencing June 1, 2019 through May 31, 2023, Docket Nos. P-2017-2637855, P-2017-2637857, P-2017-2637858; P-2017-2637866.
Pennsylvania Public Utility Commission et al. v. Philadelphia Gas Works, Docket No. R-2017-2586783.
PECO Energy Company's Pilot Plan for an Advance Payments Program and Petition for Temporary Waiver of Portions of the Commission's Regulations with Respect to that Plan, Docket No. P-2016-2573023.
Petition of PECO Energy Company for Approval of a Default Service Program for the Period of June 1, 2017 through May 31, 2019, Docket No. P-2016-2534980.
Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period of June 1, 2017 through May 31, 2021, Docket No. P-2016-2526627.

Petition of Duquesne Light Company for Approval of a Default Service Program for the Period of June 1, 2017 through May 31, 2021, Docket No. P-2016-2543140.
Pennsylvania Public Utility Commission et al. v. Columbia Gas of Pennsylvania, Inc., Docket No. R-2016-2529660.
Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of their Default Service Programs for the period commencing June 1, 2017 through May 31, 2019, Docket Nos. P-2015-2511333, P-2015-25113351, P-2015-2511355, P-2015-2511356.
Petition of PPL Electric Utilities Corporation for Approval of its Energy Efficiency and Conservation Plan, Docket No. M-2015-2515642.

CAUSE-PA Statement 1, Geller Appendix B

Interrogatories of CAUSE-PA to NFG

NFG Response to CAUSE-PA 1-1
NFG Response to CAUSE-PA 1-2
NFG Revised Response to CAUSE-PA 1-3, Attachment – Revised
NFG Response to CAUSE-PA 1-4
NFG Revised Response to CAUSE-PA 1-5, Attachment – Revised
NFG Revised Response to CAUSE-PA 1-6, Attachment
NFG Revised Response to CAUSE-PA 1-8, Attachment – Revised
NFG Response to CAUSE-PA 1-9, Attachment
NFG Response to CAUSE-PA 1-10, Attachment –
    Estimate of the Number of NFG's Low Income Households
    Total Active Residential Accounts by County
NFG Response to CAUSE-PA 1-11, Attachment
NFG Response to CAUSE-PA 1-12, Attachment
NFG Revised Response to CAUSE-PA 1-13, Attachment – Revised
NFG Revised Response to CAUSE-PA 1-16, Attachment – Revised
NFG Response to CAUSE-PA 1-17
NFG Response to CAUSE-PA 1-18, Attachment
NFG Response to CAUSE-PA 1-19
NFG Response to CAUSE-PA 1-21, Attachment
NFG Revised Response to CAUSE-PA 1-23, Attachment - Revised
NFG Second Response to CAUSE-PA 1-24, Attachment – Revised
NFG Revised Response to CAUSE-PA 1-26, Attachment - Revised
NFG Second Revised Response to CAUSE-PA 1-26, Attachment – Second Revised
NFG Response to CAUSE-PA 2-1, Attachment
NFG Response to CAUSE-PA 2-4, Attachment
NFG Response to CAUSE-PA 2-7
NFG Response to CAUSE-PA 2-8
NFG Response to CAUSE-PA 2-9, Attachment
NFG Response to CAUSE-PA 2-10, Attachment
NFG Response to CAUSE-PA 2-15, Attachment
NFG Response to CAUSE-PA 2-21, Attachment
NFG Response to CAUSE-PA 2-22, Attachment
NFG Response to CAUSE-PA 3-17
NFG Response to CAUSE-PA 3-19
NFG Response to CAUSE-PA 3-20
NFG Response to CAUSE-PA 3-21
NFG Response to CAUSE-PA 3-22
NFG Response to CAUSE-PA 3-27

NFG Response to CAUSE-PA 3-28, Attachment
NFG Response to CAUSE-PA 4-9
NFG Response to CAUSE-PA 4-11
NFG Response to CAUSE-PA 4-17
NFG Response to CAUSE-PA 4-19
NFG Response to CAUSE-PA 4-20, Attachment
NFG Response to CAUSE-PA 4-26
NFG Response to CAUSE-PA 4-27
NFG Response to CAUSE-PA 4-28
NFG Response to CAUSE-PA 5-16
NFG Response to CAUSE-PA 5-20

Interrogatories of OCA to NFG
NFG Response to OCA IV-1, Attachment
NFG Response to OCA IV-15, Attachment
NFG Response to OCA IV-19
NFG Response to OCA IX-38, Attachment

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please identify the financial impact of the proposed increase on customers enrolled in NFG's Customer Assistance Program (CAP), by payment plan type and income tier. If you are unable to identify the financial impact, or assert that there will be no impact, please explain.

Response

CAP participants pay only up to their respective energy burdens of either 4% or 6%. Therefore, it is assumed that CAP participants would not experience a financial impact as a result of the Company's proposed base rate increase because they would only still be responsible to pay up to their energy burden percentage.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Is NFG proposing to implement any changes to its Universal Services and Energy Conservation Plan (USECP) Programs in the context of the present proceeding? If so, please specifically describe any proposed change to NFG's USECP Program(s) NFG proposes, including the timeline for implementing changes.

Response

The Company did not initially propose any changes to its USECP. However, given the current level of funding of the Neighbor for Neighbor program, the Company is evaluating certain changes that will facilitate its efforts to better support customers who are most in need of assistance. These proposed changes are as follows:

1. Making income a mandatory criterion; applicants need to meet both the income requirement (0-200%) and one other specified/current requirement to qualify.
2. Limiting the program to only National Fuel Gas customers.
3. Flexibility to change the grant amount based on demand.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From January 2023 to date, disaggregated by month and year, as of the last day of the month/year, please identify the number of NFG CAP customers whose bills were calculated based on: a) Discounted Rate (disaggregated by discount rate tier, i.e., 10%, 20%, 30%, etc.) b) Percentage of income (disaggregated by income tier); c) Average monthly bill; d) Minimum bill; or e) Other (please specify). Please provide this data in a live excel spreadsheet.

Response

The Company converted from the Low-Income Residential Assistance (LIRA) program, which provided discounted rates, to the Customer Assistance Program (CAP), a percentage-of-income program, effective April 20, 2024.

The Company's CAP bills are categorized by billing type (Percentage of Income Plan (PIP), Average, or Minimum) and does not utilize any additional billing types that would classify as other under either the LIRA or CAP. This information will not align with CAP enrollment counts per month due to the Company's billing cycle and customer moves.

See revised Attachment Cause-PA-I-03.

Year	Month	a) Discount Rate 10% (LIRA)	a) Discount Rate 20% (LIRA)	a) Discount Rate 30% (LIRA)	a) Discount Rate 40% (LIRA)
2023	January	2865	460	474	939
2023	February	2952	683	424	1437
2023	March	3018	692	444	1439
2023	April	3190	660	523	1373
2023	May	3583	448	977	873
2023	June	3585	444	978	847
2023	July	3686	442	957	806
2023	August	5327	839	241	182
2023	September	5546	783	230	186
2023	October	5626	722	234	174
2023	November	5112	714	310	161
2023	December	4886	633	273	155
2024	January	4847	583	254	147
2024	February	4708	489	224	86
2024	March	4419	402	189	66
2024	April	3182	286	124	46
2024	May	n/a	n/a	n/a	n/a
2024	June	n/a	n/a	n/a	n/a
2024	July	n/a	n/a	n/a	n/a
2024	August	n/a	n/a	n/a	n/a
2024	September	n/a	n/a	n/a	n/a
2024	October	n/a	n/a	n/a	n/a
2024	November	n/a	n/a	n/a	n/a
2024	December	n/a	n/a	n/a	n/a
2025	January	n/a	n/a	n/a	n/a
2025	February	n/a	n/a	n/a	n/a
2025	March	n/a	n/a	n/a	n/a
2025	April	n/a	n/a	n/a	n/a
2025	May	n/a	n/a	n/a	n/a
2025	June	n/a	n/a	n/a	n/a
2025	July	n/a	n/a	n/a	n/a
2025	August	n/a	n/a	n/a	n/a
2025	September	n/a	n/a	n/a	n/a
2025	October	n/a	n/a	n/a	n/a
2025	November	n/a	n/a	n/a	n/a
2025	December	n/a	n/a	n/a	n/a
2026	January	n/a	n/a	n/a	n/a

Year	Month	a) Discount Rate 50% (LIRA)	a) Discount Rate 60% (LIRA)	a) Discount Rate 70% (LIRA)	a) Discount Rate 80% (LIRA)	b) PIP (CAP)
2023	January	985	398	187	475	n/a
2023	February	361	302	182	475	n/a
2023	March	369	312	184	580	n/a
2023	April	382	307	188	709	n/a
2023	May	440	249	167	775	n/a
2023	June	437	243	165	825	n/a
2023	July	419	227	156	878	n/a
2023	August	101	91	47	904	n/a
2023	September	105	94	49	961	n/a
2023	October	100	87	48	1014	n/a
2023	November	92	89	55	947	n/a
2023	December	84	80	51	911	n/a
2024	January	77	73	49	902	n/a
2024	February	84	61	39	869	n/a
2024	March	64	55	33	748	n/a
2024	April	49	47	26	560	599
2024	May	n/a	n/a	n/a	n/a	1869
2024	June	n/a	n/a	n/a	n/a	1911
2024	July	n/a	n/a	n/a	n/a	1829
2024	August	n/a	n/a	n/a	n/a	2072
2024	September	n/a	n/a	n/a	n/a	2091
2024	October	n/a	n/a	n/a	n/a	2141
2024	November	n/a	n/a	n/a	n/a	2258
2024	December	n/a	n/a	n/a	n/a	2291
2025	January	n/a	n/a	n/a	n/a	2320
2025	February	n/a	n/a	n/a	n/a	2550
2025	March	n/a	n/a	n/a	n/a	2578
2025	April	n/a	n/a	n/a	n/a	2606
2025	May	n/a	n/a	n/a	n/a	2599
2025	June	n/a	n/a	n/a	n/a	2568
2025	July	n/a	n/a	n/a	n/a	2628
2025	August	n/a	n/a	n/a	n/a	2960
2025	September	n/a	n/a	n/a	n/a	2962
2025	October	n/a	n/a	n/a	n/a	2958
2025	November	n/a	n/a	n/a	n/a	2910
2025	December	n/a	n/a	n/a	n/a	2991
2026	January	n/a	n/a	n/a	n/a	3084

Year	Month	c) Average monthly bill (CAP)	d) Minimum Bill (CAP)	e) Other
2023	January	n/a	n/a	n/a
2023	February	n/a	n/a	n/a
2023	March	n/a	n/a	n/a
2023	April	n/a	n/a	n/a
2023	May	n/a	n/a	n/a
2023	June	n/a	n/a	n/a
2023	July	n/a	n/a	n/a
2023	August	n/a	n/a	n/a
2023	September	n/a	n/a	n/a
2023	October	n/a	n/a	n/a
2023	November	n/a	n/a	n/a
2023	December	n/a	n/a	n/a
2024	January	n/a	n/a	n/a
2024	February	n/a	n/a	n/a
2024	March	n/a	n/a	n/a
2024	April	1160	242	n/a
2024	May	3594	797	n/a
2024	June	3524	789	n/a
2024	July	3227	677	n/a
2024	August	2981	693	n/a
2024	September	2965	711	n/a
2024	October	2994	741	n/a
2024	November	3006	771	n/a
2024	December	2975	745	n/a
2025	January	2970	714	n/a
2025	February	2780	717	n/a
2025	March	2775	704	n/a
2025	April	2734	673	n/a
2025	May	2690	645	n/a
2025	June	2668	562	n/a
2025	July	2585	508	n/a
2025	August	2317	486	n/a
2025	September	2330	500	n/a
2025	October	2410	537	n/a
2025	November	2555	579	n/a
2025	December	2568	597	n/a
2026	January	2663	594	n/a

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

How does NFG define the term "confirmed low income customer" for the purposes of reporting pursuant to 52 Pa. Code § 62.5? Please provide any and all documents that contain the definition, including references to applicable tariff pages. If NFG uses a different definition or categorization criteria for "confirmed low income customer" for any purpose, please identify the alternative definition and/or criteria and explain why a different definition is used.

Response

The Company defines a confirmed low-income customer as a customer with recorded household income at or below 150 percent of the Federal Poverty Guidelines. In addition, customers who have not contacted the Company to update their income information, but who receive a LIHEAP grant are also designated as confirmed low-income customers.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From January 2023 to date, disaggregated by month and year, as of the last day of the month/year, how many of NFG's customers were/are categorized as confirmed low income? If NFG uses multiple definitions of the term "confirmed low income", as identified in CAUSE-PA 1-4, please separately provide the data requested for each definition. Please provide this data in a live excel spreadsheet.

Response

See Attachment Cause-I-PA-05 Revised with an updated January 2026 number.

Year	January	February	March	April	May	June	July	August	September	October	November	December
2023	24,282	24,546	24,750	24,560	24,297	23,929	23,646	23,289	23,106	23,211	23,527	23,825
2024	24,130	24,286	24,387	24,298	24,092	23,842	23,523	23,123	22,929	22,972	23,151	23,570
2025	23,936	24,096	24,366	24,300	23,946	23,604	23,308	23,021	24,375	24,483	24,544	24,901
2026	25,308	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From January 2023 to date, disaggregated by month and year, as of the last day of the month/year, how many of NFG's customers were/are enrolled in NFG's CAP? Please provide this information broken down by CAP enrollment type (i.e., percentage of income, average bill, minimum bill, etc.). Please provide this data in a live excel spreadsheet.

Response

The Company does not track CAP customers by enrollment type as described. This information is not captured at enrollment, but rather at monthly invoicing.

The Company would define this information as "CAP bill type" (i.e., percentage of income (PIP), average bill or minimum bill). See revised response Cause-PA-I-03 for this information.

See Attachment Cause-PA-I-06 for available data which includes total customers enrolled in CAP by month and year. There are no changes to this attachment.

Year	Month	Enrolled in CAP
2023	January	6736
2023	February	6706
2023	March	7070
2023	April	7291
2023	May	7361
2023	June	7356
2023	July	7441
2023	August	7675
2023	September	7820
2023	October	7510
2023	November	6927
2023	December	7077
2024	January	6604
2024	February	5906
2024	March	5888
2024	April	6133
2024	May	6244
2024	June	5807
2024	July	5633
2024	August	5699
2024	September	5832
2024	October	5897
2024	November	6017
2024	December	5930
2025	January	5989
2025	February	5992
2025	March	5973
2025	April	5892
2025	May	5803
2025	June	5705
2025	July	5654
2025	August	5658
2025	September	5743
2025	October	5929
2025	November	6002
2025	December	6217
2026	January	6352

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From January 2023 to date, disaggregated by month and year (as of the last day of the month/year), please provide the number of: a) Residential NFG customers; b) Residential NFG customers, excluding confirmed low income customers and CAP customers; c) Confirmed low income NFG customers, excluding CAP customers; Please provide this data in a live excel spreadsheet.

Response

See Attachment Cause-PA-I-08 Revised with updated response for section (c). This section is now updated for the number of confirmed low income customers, excluding CAP customers.

Year	Month	CAUSE-PA-I-8 a. (number) - Residential NFG customers	CAUSE-PA-I-8 b. (number) - Residential NFG customers, excluding confirmed low income customers and CAP customers	CAUSE-PA-I-8 c. (number) - Confirmed low income NFG customers, excluding CAP customers
2023	January	197,569	166,551	17,546
2023	February	197,602	166,350	17,840
2023	March	197,765	165,945	17,680
2023	April	196,998	165,147	17,269
2023	May	196,055	164,397	16,936
2023	June	195,534	164,249	16,573
2023	July	194,988	163,901	16,205
2023	August	194,816	163,852	15,614
2023	September	195,205	164,279	15,286
2023	October	195,919	165,198	15,701
2023	November	196,994	166,540	16,600
2023	December	197,488	166,586	16,748
2024	January	197,638	166,904	17,526
2024	February	197,647	167,455	18,380
2024	March	197,715	167,440	18,499
2024	April	197,088	166,657	18,165
2024	May	196,522	166,186	17,848
2024	June	196,115	166,466	18,035
2024	July	195,589	166,433	17,890
2024	August	195,474	166,652	17,424
2024	September	195,304	166,543	17,097
2024	October	196,086	167,217	17,075
2024	November	196,960	167,792	17,134
2024	December	197,411	167,911	17,640
2025	January	197,629	167,737	17,947
2025	February	197,711	167,643	18,104
2025	March	197,559	167,230	18,393
2025	April	196,803	166,611	18,408
2025	May	196,134	166,385	18,143
2025	June	195,295	165,986	17,899
2025	July	194,873	165,911	17,654
2025	August	194,900	166,221	17,363
2025	September	194,849	164,731	18,632
2025	October	195,816	165,404	18,554
2025	November	196,675	166,129	18,542
2025	December	197,241	166,123	18,684
2026	January	197,507	165,847	18,956

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

How many of NFG's confirmed low-income customers received a LIHEAP Cash and/or Crisis Grant for the following LIHEAP program years: (A) 2022-2023; (B) 2023-2024; (C) 2024-2025; and (D) 2025-2026? Please disaggregate by program year and type of grant received (Cash Only, Crisis Only, Both Cash and Crisis, Supplemental). Please also identify the total LIHEAP dollars received by NFG on behalf of LIHEAP recipients for each program year listed above. Please provide this data in a live excel spreadsheet.

Response

See Attachment Cause-PA-I-09.

	(A) 2022-2023	(B) 2023-2024	(C) 2024-2025	(D) 2025-2026*
Cash Only	14,412	13,078	12,372	8,788
Crisis Only	3,257	2,358	3,153	63
Both Cash and Crisis	2,534	1,889	2,510	105
Supplemental	14,180	0	8,693	0
Total LIHEAP Dollars	$9,521,950	$5,950,024	$5,647,651	$2,447,873

*Through February 27, 2026

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

As of the most recent available date, how many estimated low income customers reside within NFG's service territory? Please explain how NFG arrived at its estimated figures and include citation and/or copies of all workpapers used to perform the estimation.

Response

See Attachment Cause-PA-I-10.

ESTIMATE OF THE NUMBER OF NATIONAL FUEL'S LOW INCOME HOUSEHOLDS

National Fuel Customer Count as of December, 2025

County	Total Number of Households in County*	Number of Households at or Below 150% of Poverty Level	Fraction of Households at or Below 150% of Poverty Level	Number of National Fuel Households in County	Estimated No. of National Fuel Households at or Below 150% of Poverty Level
Armstrong	28,035	7,153	0.255145	592	151
Butler	80,824	14,398	0.178140	2,100	374
Cameron	2,216	585	0.263989	1,297	342
Clarion	15,049	4,542	0.301814	3,762	1,135
Clearfield	32,518	9,548	0.293622	7,062	2,074
Crawford	33,838	10,689	0.315887	17,368	5,486
Elk	13,325	3,321	0.249231	10,997	2,741
Erie	110,587	33,451	0.302486	91,391	27,644
Forest	1,920	474	0.24688	880	217
Jefferson	18,344	5,230	0.285107	6,479	1,847
McKean	16,369	4,865	0.297208	5,639	1,676
Mercer	46,524	12,530	0.269323	26,208	7,058
Potter	6,992	1,955	0.279605	4	1
Venango	21,397	6,282	0.293593	14,179	4,163
Warren	16,123	4,396	0.272654	9,650	2,631
Total/Avg.	**444,061**	**119,419**	**0.273645**	197,608	57,542

Data obtained from PA Public Utility Commission - 2026-03-04

Poverty Levels for Pennsylvania Counites (Low Income - < 150 and Higher Income 150 >): 2020-2024.

Poverty Levels Shown for Households, Families and Individuals.

Source: 2020-2024 American Community Survey 5-Year Estimates - United States Census Bureau

Total Active Residential Accounts By County
Pennsylvania Division
December 31, 2025

Source: SAP SQ01 or ZSQ01: PA_LOW_INCOME, ADID = PR or PS, Move In Date <= 12/31/2025, Move Out Date >= 12/31/2025

County	Code	PR Residential	PS Residential	Total Residential	Low Income Level 1	2A	2B	3	4	Total	Low Income Indic
Armstrong	AR	569	23	592	38	13	5	9	10	75	45
Butler	BU	2,004	96	2,100	149	34	29	17	36	265	149
Clearfield	CL	6,339	723	7,062	644	195	114	49	70	1,072	686
Cameron	CM	1,189	108	1,297	145	49	35	24	21	274	171
Clarion	CN	3,403	359	3,762	382	93	52	33	51	611	432
Crawford	CW	16,074	1,294	17,368	2,003	554	356	186	242	3,341	2,178
Elk	EL	10,303	694	10,997	832	275	216	127	172	1,622	884
Erie	EP	86,275	5,116	91,391	11,671	2,999	1,884	1,012	1,476	19,042	12,327
Forest	FO	832	48	880	76	22	11	8	13	130	91
Jefferson	JF	6,043	436	6,479	612	214	126	82	103	1,137	734
Mercer	ME	24,848	1,360	26,208	3,943	964	549	335	440	6,231	4,178
McKean	MK	5,294	345	5,639	686	202	145	77	112	1,222	734
Potter	PO	4	0	4	1	0	0	0	0	1	0
Venango	VN	13,338	841	14,179	2,029	574	309	173	201	3,286	2,131
Warren	WR	9,124	526	9,650	955	308	187	112	174	1,736	1,000
Total		185,639	11,969	197,608	24,166	6,496	4,018	2,244	3,121	40,045	25,740

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

How many NFG customers were removed from NFG's CAP from January 2023 to date, disaggregated by month and year (as of the last day of the month/year)? Please provide this data in a live excel spreadsheet.

Response

See Attachment Cause-PA-I-11.

Year	January	February	March	April	May	June	July	August	September	October	November	December
2023	128	136	120	108	174	197	157	163	217	469	707	107
2024	294	1040	312	91	85	531	408	277	238	301	218	201
2025	178	63	147	233	293	349	378	176	201	250	161	160
2026	131	137										

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

For customers identified in CAUSE-PA 1-11, please additionally disaggregate by reason of CAP removal (i.e. nonpayment, failure to recertify, etc.). Please provide this data in a live excel spreadsheet.

Response

See Attachment Cause-PA-I-12.

Year	Reason	January	February	March	April	May	June	July	August	September	October	November	December
2023	Customer Request	0	1	3	2	2	1	7	3	7	3	0	2
2023	Deceased	4	8	2	5	8	5	2	7	2	8	5	1
2023	Refused Energy Audit	0	0	1	0	0	0	0	0	0	0	0	0
2023	Over Income	21	16	19	13	12	18	11	19	29	24	30	26
2023	Moved	47	33	33	43	58	62	48	66	64	70	47	53
2023	Non_Response	15	39	23	13	18	45	3	0	1	303	579	2
2023	Other	3	3	6	3	9	3	4	6	5	0	3	4
2023	Entered into an IP	0	2	2	7	24	10	22	21	40	15	12	1
2023	Shut-Off Non-Pmt	0	0	0	4	17	14	9	15	16	14	3	0
2023	Transfer	35	32	30	15	24	35	50	26	48	32	23	18
2023	No Longer Meets Req	3	2	1	3	2	4	1	0	5	0	5	0
2024	Customer Request	1	1	0	3	4	4	6	6	6	4	1	1
2024	Deceased	8	1	3	3	7	1	4	2	1	3	4	2
2024	Refused Energy Audit	0	0	0	0	0	0	0	0	0	0	0	0
2024	Over Income	13	29	16	15	3	4	3	7	14	19	15	5
2024	Moved	47	38	39	40	34	49	54	40	41	46	38	33
2024	Non_Response	207	939	221	1	2	448	319	203	112	157	120	143
2024	Other	0	0	0	1	3	4	4	2	5	4	1	1
2024	Entered into an IP	1	5	1	1	0	0	0	0	30	13	2	0
2024	Shut-Off Non-Pmt	0	0	0	0	0	1	0	0	1	22	5	1
2024	Transfer	17	26	30	26	30	19	18	15	27	32	23	14
2024	No Longer Meets Req	0	1	2	1	2	1	0	2	1	1	9	1
2025	Customer Request	2	1	2	0	2	2	4	6	4	8	4	1
2025	Deceased	0	1	4	7	9	4	3	1	3	2	1	1
2025	Refused Energy Audit	0	0	0	0	0	0	0	0	0	0	0	0
2025	Over Income	7	3	8	9	8	9	16	11	11	11	4	2
2025	Moved	38	28	37	38	55	43	51	44	51	40	39	33
2025	Non_Response	110	0	75	134	135	240	244	67	79	124	80	97
2025	Other	2	1	2	1	5	1	5	2	5	3	3	3
2025	Entered into an IP	0	0	1	14	36	19	23	15	10	15	2	1
2025	Shut-Off Non-Pmt	0	0	0	0	20	14	7	6	14	10	3	0
2025	Transfer	19	27	18	29	22	14	23	22	22	35	24	19
2025	No Longer Meets Req	0	2	0	1	1	3	2	2	2	2	1	3
2026	Customer Request	0	4										
2026	Deceased	3	1										
2026	Refused Energy Audit	0	0										
2026	Over Income	4	13										
2026	Moved	33	22										
2026	Non_Response	60	67										
2026	Other	2	2										
2026	Entered into an IP	1	1										
2026	Shut-Off Non-Pmt	0	0										
2026	Transfer	26	26										
2026	No Longer Meets Req	2	1										

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From January 2023 to date, disaggregated by month and year (as of the last day of the month/year), how many NFG customers were terminated for nonpayment each month, disaggregated by the following customer segments: a) All residential NFG customers; b) Residential NFG customers, excluding confirmed low income customers and CAP customers; c) Confirmed low income NFG customers; d) Confirmed low income NFG customers, excluding CAP customers; e) NFG CAP customers. Please provide this data in a live excel spreadsheet.

Response

See Attachment Cause-PA-I-13 Revised.

Year	Month	CAUSE-PA-I-13 a. (number) - All residential NFG customers	CAUSE-PA-I-13 b. (number) - Residential NFG customers, excluding confirmed low-income customers and CAP customers	CAUSE-PA-I-13 c. (number) - Confirmed low income NFG customers	CAUSE-PA-I-13 d. (number) - Confirmed low income NFG customers, excluding CAP customers	CAUSE-PA-I-13 e. (number) - NFG CAP customers
2023	January	0	0	0	0	0
2023	February	0	0	0	0	0
2023	March	0	0	0	0	0
2023	April	1494	809	685	672	13
2023	May	1271	735	536	515	21
2023	June	1147	640	507	495	12
2023	July	867	461	406	379	27
2023	August	973	476	497	463	34
2023	September	604	294	310	287	23
2023	October	538	258	280	262	18
2023	November	87	40	47	46	1
2023	December	0	0	0	0	0
2024	January	0	0	0	0	0
2024	February	0	0	0	0	0
2024	March	0	0	0	0	0
2024	April	1556	927	629	629	0
2024	May	1031	637	394	394	0
2024	June	906	545	361	361	0
2024	July	909	484	425	425	0
2024	August	850	439	411	410	1
2024	September	657	356	301	263	38
2024	October	557	272	285	268	17
2024	November	169	80	89	88	1
2024	December	0	0	0	0	0
2025	January	0	0	0	0	0
2025	February	0	0	0	0	0
2025	March	0	0	0	0	0
2025	April	2134	1284	850	836	14
2025	May	1327	804	523	485	38
2025	June	1125	622	503	492	11
2025	July	1086	639	447	428	19
2025	August	799	436	363	339	24
2025	September	702	326	376	356	20
2025	October	402	193	209	193	16
2025	November	136	63	73	73	0
2025	December	0	0	0	0	0
2026	January	0	0	0	0	0

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
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Question

From January 2023 to date, please provide the mean and median customer usage, disaggregated by month and year (as of the last day of the month/year), for each of the following customer segments: a) All residential NFG customers; b) Residential NFG customers, excluding confirmed low income customers and CAP customers; c) Confirmed low income NFG customers; d) Confirmed low income NFG customers, excluding CAP customers; e) NFG CAP customers. Please provide this data in a live excel spreadsheet.

Response

See revised Attachment Cause-PA-I-16.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Response Cause-PA-I-16

a) Residential Mean Usage by Month (CCF)			
	2023	2024	2025
Jan	161	149	181
Feb	149	149	187
Mar	136	118	148
Apr	103	106	102
May	67	48	57
Jun	30	25	34
Jul	16	17	15
Aug	16	16	16
Sep	18	18	20
Oct	30	27	27
Nov	66	56	76
Dec	120	131	151

b) Residential Mean Usage NFG customers Exlcuding CLI and CAP (CCF)			
	2023	2024	2025
Jan	158	148	180
Feb	146	146	184
Mar	134	116	146
Apr	99	102	98
May	61	46	52
Jun	27	23	30
Jul	16	16	15
Aug	15	15	16
Sep	18	18	19
Oct	29	27	27
Nov	65	55	75
Dec	119	131	149

c) Mean Usage Confirmed Low Income NFG Customers (CCF)			
	2023	2024	2025
Jan	164	150	186
Feb	151	151	191
Mar	138	119	153
Apr	105	105	102
May	66	49	56
Jun	29	24	32
Jul	15	16	15
Aug	14	14	15
Sep	17	17	19
Oct	30	27	27
Nov	67	57	77
Dec	125	135	155

National Fuel Gas Distribution Corporation
Pennsylvania Division
Response Cause-PA-I-16

a) Residential Median Usage by Month (CCF)			
	2023	2024	2025
Jan	146	135	164
Feb	135	134	168
Mar	124	106	131
Apr	91	95	92
May	60	41	49
Jun	24	20	27
Jul	11	12	10
Aug	11	11	12
Sep	14	14	16
Oct	24	21	21
Nov	58	49	67
Dec	108	117	136

b) Residential Median Usage NFG customers Exlcuding CLI and CAP (CCF)			
	2023	2024	2025
Jan	143	134	162
Feb	133	132	165
Mar	122	104	129
Apr	88	92	88
May	54	39	45
Jun	21	19	23
Jul	12	12	11
Aug	11	11	12
Sep	14	14	15
Oct	24	20	21
Nov	57	49	66
Dec	107	116	134

c) Median Usage Confirmed Low Income NFG Customers (CCF)			
	2023	2024	2025
Jan	152	139	172
Feb	140	139	177
Mar	128	108	139
Apr	95	96	94
May	59	42	48
Jun	24	20	26
Jul	12	12	12
Aug	11	11	12
Sep	14	14	16
Oct	25	21	23
Nov	60	51	69
Dec	115	123	143

d) Mean Usage Confirmed Low Income NFG Customers Excluding CAP Customers (CCF)			
	2023	2024	2025
Jan	163	150	183
Feb	151	151	189
Mar	138	119	152
Apr	104	106	101
May	65	48	55
Jun	29	23	32
Jul	15	16	14
Aug	14	14	15
Sep	17	17	19
Oct	29	26	27
Nov	66	56	76
Dec	124	133	152

d) Median Usage Confirmed Low Income NFG Customers Excluding CAP Customers (CCF)			
	2023	2024	2025
Jan	151	138	170
Feb	140	139	175
Mar	127	109	137
Apr	95	97	93
May	58	41	47
Jun	24	19	26
Jul	12	12	11
Aug	11	11	12
Sep	14	14	16
Oct	25	21	22
Nov	59	51	68
Dec	114	121	141

e) CAP Mean Usage by Month (CCF)			
	2023	2024	2025
Jan	168	159	198
Feb	156	162	201
Mar	143	127	161
Apr	113	117	112
May	73	54	63
Jun	34	27	41
Jul	16	18	16
Aug	15	16	18
Sep	18	19	20
Oct	31	28	32
Nov	70	61	84
Dec	131	142	168

e) CAP Median Usage by Month (CCF)			
	2023	2024	2025
Jan	155	147	180
Feb	144	150	185
Mar	132	116	145
Apr	101	106	101
May	66	47	54
Jun	29	22	31
Jul	12	13	11
Aug	11	12	12
Sep	14	14	17
Oct	27	22	24
Nov	63	55	74
Dec	121	128	151

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From January 2023 to date, disaggregated by month and year, as of the last day of the month/year, please provide the average customer bill amount for NFG customers at mean usage as indicated in response to CAUSE-PA 1-16, for each of the following customer segments: a) All residential NFG customers; b) Residential NFG customers, excluding confirmed low income customers and CAP customers; c) Confirmed low income NFG customers; d) Confirmed low income NFG customers, excluding CAP customers; e) NFG CAP customers. Please provide this data in a live excel spreadsheet.

Response

Please see Attachment Cause-PA-I-17 for requests a and e. Please refer to OCA-IV-15 for Residential Average Bill January 2024 through December 2025. For sections b., c., and d., the Company does not maintain data in the format requested.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From 2022 to date, disaggregated by year, as of the last day of the year, please provide the total NFG accounts that were written off for non-payment and the associated write-offs (in dollars) for those accounts, disaggregated by the following customer segments: a) All residential NFG customers; b) Residential NFG customers, excluding confirmed low income customers and CAP customers; c) Confirmed low income NFG customers; d) Confirmed low income NFG customers, excluding CAP customers; e) NFG CAP customers. Please provide this data in a live excel spreadsheet.

Response

Refer to CAUSE-PA-I-18.

National Fuel Gas Distribution Corporation
Pennsylvania Division
Total Amounts Net Written Off as Uncollectible (Calendar Year)
CAUSE PA-I-18

Total Amounts Written Off as Uncollectible (Calendar Year) (A)	2022	2023	2024	2025
Residential customers (1)	$ 3,789,722	$ 3,896,436	$ 5,054,569	$ 7,294,689
Residential customers, excluding low income customers and CAP customers (2 = 1 - 3)	$ 1,264,133	$ 1,107,586	$ 1,180,663	$ 1,810,125
Low income customers (3)	$ 2,525,589	$ 2,788,850	$ 3,873,906	$ 5,484,564
Low income NFG customers, excluding CAP customers (4 = 3 - 5)	$ 2,239,447	$ 2,333,753	$ 2,720,676	$ 3,657,616
CAP Customers (5)	$ 286,142	$ 455,097	$ 1,153,230	$ 1,826,948

Total Recoveries of Prevously Written Off Amounts (Calendar Year) (B)	2022	2023	2024	2025
Residential customers (1)	$ 961,427	$ 739,679	$ 770,392	$ 1,169,844
Residential customers, excluding low income customers and CAP customers (2 = 1 - 3)	$ 270,928	$ 238,156	$ 354,445	$ 108,564
Low income customers (3)	$ 690,499	$ 501,523	$ 415,947	$ 1,061,280
Low income NFG customers, excluding CAP customers (4 = 3 - 5)	$ 678,612	$ 483,196	$ 348,931	$ 803,673
CAP Customers (5)	$ 11,887	$ 18,327	$ 67,016	$ 257,607

Total Amounts Net Written Off as Uncollectible (Calendar Year) (A - B)	2022	2023	2024	2025
Residential customers (1)	$ 2,828,295	$ 3,156,757	$ 4,284,177	$ 6,124,845
Residential customers, excluding low income customers and CAP customers (2 = 1 - 3)	$ 993,205	$ 869,430	$ 826,218	$ 1,701,561
Low income customers (3)	$ 1,835,090	$ 2,287,327	$ 3,457,959	$ 4,423,284
Low income NFG customers, excluding CAP customers (4 = 3 - 5)	$ 1,560,835	$ 1,850,557	$ 2,371,744	$ 2,853,943
CAP Customers (5)	$ 274,255	$ 436,770	$ 1,086,215	$ 1,569,341

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

What is the average annual income of NFG's currently identified confirmed low income customers?

Response

The average annual income of National Fuel Gas customers currently identified as confirmed low income is $16,720.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From January 2023 to date, please provide the number of payment troubled customers, disaggregated by month and year (as of the last day of the month/year), and the following customer segments: a) All residential NFG customers; b) Residential NFG customers, excluding confirmed low income customers and CAP customers; c) Confirmed low income NFG customers; d) Confirmed low income NFG customers, excluding CAP customers; e) NFG CAP customers. Please provide this data in a live excel spreadsheet.

Response

See Attachment CAUSE-PA-I-21 for (a) All residential NFG customers and (d) Confirmed low income NFG customers, excluding CAP customers. The Company does track CAP payment troubled customers separately and is unable to provide the data for (b), (c), and (e).

Year	Month	CAUSE-PA-I-21 a. (number)	CAUSE-PA-I-21 b. (number)	CAUSE-PA-I-21 c. (number)	CAUSE-PA-I-21 d. (number)	CAUSE-PA-I-21 e. (number)
2023	January	7,453	n/a	n/a	3,422	n/a
2023	February	7,480	n/a	n/a	3,392	n/a
2023	March	7,581	n/a	n/a	3,365	n/a
2023	April	7,686	n/a	n/a	3,384	n/a
2023	May	7,795	n/a	n/a	3,382	n/a
2023	June	7,864	n/a	n/a	3,393	n/a
2023	July	8,057	n/a	n/a	3,469	n/a
2023	August	8,264	n/a	n/a	3,601	n/a
2023	September	8,459	n/a	n/a	3,709	n/a
2023	October	8,457	n/a	n/a	3,728	n/a
2023	November	8,541	n/a	n/a	3,765	n/a
2023	December	8,607	n/a	n/a	3,807	n/a
2024	January	8,956	n/a	n/a	4,002	n/a
2024	February	9,089	n/a	n/a	4,064	n/a
2024	March	9,054	n/a	n/a	4,096	n/a
2024	April	8,999	n/a	n/a	4,105	n/a
2024	May	8,931	n/a	n/a	4,091	n/a
2024	June	8,803	n/a	n/a	4,048	n/a
2024	July	8,738	n/a	n/a	4,016	n/a
2024	August	8,507	n/a	n/a	3,903	n/a
2024	September	10,097	n/a	n/a	4,634	n/a
2024	October	10,787	n/a	n/a	4,937	n/a
2024	November	10,857	n/a	n/a	5,017	n/a
2024	December	10,720	n/a	n/a	4,939	n/a
2025	January	6,072	n/a	n/a	2,920	n/a
2025	February	5,989	n/a	n/a	2,870	n/a
2025	March	5,945	n/a	n/a	2,842	n/a
2025	April	5,643	n/a	n/a	2,655	n/a
2025	May	5,416	n/a	n/a	2,522	n/a
2025	June	5,303	n/a	n/a	2,464	n/a
2025	July	5,261	n/a	n/a	2,465	n/a
2025	August	5,141	n/a	n/a	2,420	n/a
2025	September	5,383	n/a	n/a	3,072	n/a
2025	October	5,732	n/a	n/a	3,243	n/a
2025	November	6,165	n/a	n/a	3,510	n/a
2025	December	6,597	n/a	n/a	3,762	n/a
2026	January	6,811	n/a	n/a	3,898	n/a

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From January 2023 to date, disaggregated by month and year (as of the last day of the month/year), please provide the number of customers with an active payment arrangement and total debt associated with these accounts for each of the following customer segments: a) All residential NFG customers; b) Residential NFG customers, excluding confirmed low income customers and CAP customers; c) Confirmed low income NFG customers; d) Confirmed low income NFG customers, excluding CAP customers; e) NFG CAP customers. Please provide this data in a live excel spreadsheet.

Response

See Attachment Cause-PA-I-23 Revised for (a) All residential NFG customers and (d) Confirmed low income NFG customers, excluding CAP customers. There is no data to report for items (b), (c), and (e) as the Company does not offer payment arrangements to CAP customers. Updated data for January 2026 has been added.

Year	Month	CAUSE-PA-I-23 a. (number)- All Res	CAUSE-PA-I-23 a. (total debt) - All Res	CAUSE-PA-I-23 b. (number) - exclude CLI and CAP	CAUSE-PA-I-23 b. (total debt) - exclude CLI and CAP	CAUSE-PA-I-23 c. (number) - CLI
2023	January	3,578	$ 1,766,462.20	n/a	n/a	n/a
2023	February	4,020	$ 1,909,126.33	n/a	n/a	n/a
2023	March	4,695	$ 2,493,614.91	n/a	n/a	n/a
2023	April	5,437	$ 2,996,806.55	n/a	n/a	n/a
2023	May	6,030	$ 3,278,244.23	n/a	n/a	n/a
2023	June	6,289	$ 3,582,023.54	n/a	n/a	n/a
2023	July	6,549	$ 3,672,105.51	n/a	n/a	n/a
2023	August	6,539	$ 3,642,309.94	n/a	n/a	n/a
2023	September	6,575	$ 3,791,839.97	n/a	n/a	n/a
2023	October	6,439	$ 3,832,596.99	n/a	n/a	n/a
2023	November	6,165	$ 3,749,534.53	n/a	n/a	n/a
2023	December	5,170	$ 3,009,098.66	n/a	n/a	n/a
2024	January	4,099	$ 2,048,463.94	n/a	n/a	n/a
2024	February	4,235	$ 2,022,411.32	n/a	n/a	n/a
2024	March	4,793	$ 2,585,009.92	n/a	n/a	n/a
2024	April	5,549	$ 3,042,963.38	n/a	n/a	n/a
2024	May	5,685	$ 3,002,863.09	n/a	n/a	n/a
2024	June	5,518	$ 2,909,339.21	n/a	n/a	n/a
2024	July	5,505	$ 2,828,474.34	n/a	n/a	n/a
2024	August	5,835	$ 3,027,974.17	n/a	n/a	n/a
2024	September	6,059	$ 3,190,554.13	n/a	n/a	n/a
2024	October	6,468	$ 3,484,765.24	n/a	n/a	n/a
2024	November	6,623	$ 3,772,560.94	n/a	n/a	n/a
2024	December	6,658	$ 3,923,191.22	n/a	n/a	n/a
2025	January	6,726	$ 4,188,660.76	n/a	n/a	n/a
2025	February	6,664	$ 4,173,207.79	n/a	n/a	n/a
2025	March	6,454	$ 3,671,751.45	n/a	n/a	n/a
2025	April	6,571	$ 3,296,104.52	n/a	n/a	n/a
2025	May	6,608	$ 3,327,033.16	n/a	n/a	n/a
2025	June	6,765	$ 3,466,116.59	n/a	n/a	n/a
2025	July	6,870	$ 3,618,733.41	n/a	n/a	n/a
2025	August	6,846	$ 3,631,365.16	n/a	n/a	n/a
2025	September	6,823	$ 3,666,167.04	n/a	n/a	n/a
2025	October	7,002	$ 3,948,431.14	n/a	n/a	n/a
2025	November	7,279	$ 4,461,669.48	n/a	n/a	n/a
2025	December	7,173	$ 4,797,058.01	n/a	n/a	n/a
2026	January	7,345	$ 5,265,032.37	n/a	n/a	n/a

Year	Month	CAUSE-PA-I-23 c. (total debt) - CLI	CAUSE-PA-I-23 d. (number) - CLI excluding CAP	CAUSE-PA-I-23 d. (total debt) - CLI excluding CAP	CAUSE-PA-I-23 e. (number) - CAP Customers	CAUSE-PA-I-23 e. (total debt) - CAP Customers
2023	January	n/a	1,265	$ 740,915.59	n/a	n/a
2023	February	n/a	1,259	$ 697,345.64	n/a	n/a
2023	March	n/a	1,484	$ 913,769.78	n/a	n/a
2023	April	n/a	1,812	$ 1,161,630.03	n/a	n/a
2023	May	n/a	2,150	$ 1,301,295.43	n/a	n/a
2023	June	n/a	2,422	$ 1,498,491.47	n/a	n/a
2023	July	n/a	2,682	$ 1,648,825.21	n/a	n/a
2023	August	n/a	2,715	$ 1,642,727.88	n/a	n/a
2023	September	n/a	2,783	$ 1,763,466.20	n/a	n/a
2023	October	n/a	2,731	$ 1,752,050.38	n/a	n/a
2023	November	n/a	2,617	$ 1,709,131.54	n/a	n/a
2023	December	n/a	2,080	$ 1,313,512.22	n/a	n/a
2024	January	n/a	1,523	$ 831,496.76	n/a	n/a
2024	February	n/a	1,445	$ 748,894.59	n/a	n/a
2024	March	n/a	1,688	$ 994,874.07	n/a	n/a
2024	April	n/a	2,169	$ 1,253,965.68	n/a	n/a
2024	May	n/a	2,253	$ 1,272,571.37	n/a	n/a
2024	June	n/a	2,174	$ 1,207,731.98	n/a	n/a
2024	July	n/a	2,207	$ 1,241,850.30	n/a	n/a
2024	August	n/a	2,467	$ 1,391,132.29	n/a	n/a
2024	September	n/a	2,625	$ 1,487,358.43	n/a	n/a
2024	October	n/a	2,871	$ 1,669,443.23	n/a	n/a
2024	November	n/a	2,957	$ 1,816,525.63	n/a	n/a
2024	December	n/a	2,959	$ 1,845,273.56	n/a	n/a
2025	January	n/a	3,007	$ 2,006,335.08	n/a	n/a
2025	February	n/a	2,921	$ 1,985,035.11	n/a	n/a
2025	March	n/a	2,712	$ 1,651,313.14	n/a	n/a
2025	April	n/a	2,760	$ 1,472,724.52	n/a	n/a
2025	May	n/a	2,718	$ 1,433,645.78	n/a	n/a
2025	June	n/a	2,868	$ 1,582,108.41	n/a	n/a
2025	July	n/a	2,922	$ 1,673,576.70	n/a	n/a
2025	August	n/a	2,924	$ 1,661,405.94	n/a	n/a
2025	September	n/a	2,865	$ 1,669,469.09	n/a	n/a
2025	October	n/a	3,453	$ 2,215,599.21	n/a	n/a
2025	November	n/a	3,685	$ 2,564,502.63	n/a	n/a
2025	December	n/a	3,555	$ 2,740,467.08	n/a	n/a
2026	January	n/a	3,651	$ 3,061,451.99	n/a	n/a

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From January 2023 to date, disaggregated by month and year (as of the last day of the month/year), please provide the number of NFG customers in debt without an active payment arrangement and the total debt associated with these accounts for each of the following customer segments: a) All residential NFG customers; b) Residential NFG customers, excluding confirmed low income customers and CAP customers; c) Confirmed low income NFG customers; d) Confirmed low income NFG customers, excluding CAP customers; e) NFG CAP customers. Please provide this data in a live excel spreadsheet.

Response

Please see attachment Cause-PA-I-24 Revised for (a) All residential NFG customers and (d) Confirmed low income NFG customers, excluding CAP customers. There is no data to report for items (b), (c), and (e) as the Company does not track this information for CAP customers. Updated data for January 2026 has been added. There are no changes to attachment Cause-PA-I-24 Revised.

See second revised response Cause-PA-I-26 for CAP debt information.

Year	Month	CAUSE-PA-I-24 a. (number) - All Res	CAUSE-PA-I-24 a. (total debt) - All Res	CAUSE-PA-I-24 b. (number) - excluding CLI and CAP	CAUSE-PA-I-24 b. (total debt) - excluding CLI and CAP	CAUSE-PA-I-24 c. (number) - CLI
2023	January	15,789	$ 6,219,888.88	n/a	n/a	n/a
2023	February	13,489	$ 5,921,939.11	n/a	n/a	n/a
2023	March	13,069	$ 5,940,328.76	n/a	n/a	n/a
2023	April	13,204	$ 5,384,351.90	n/a	n/a	n/a
2023	May	11,618	$ 4,159,170.19	n/a	n/a	n/a
2023	June	12,119	$ 3,545,162.69	n/a	n/a	n/a
2023	July	12,200	$ 3,416,815.57	n/a	n/a	n/a
2023	August	12,233	$ 3,094,156.06	n/a	n/a	n/a
2023	September	13,807	$ 3,397,869.98	n/a	n/a	n/a
2023	October	13,114	$ 3,290,044.10	n/a	n/a	n/a
2023	November	13,688	$ 3,538,272.36	n/a	n/a	n/a
2023	December	16,225	$ 4,876,428.17	n/a	n/a	n/a
2024	January	16,100	$ 6,077,129.19	n/a	n/a	n/a
2024	February	13,823	$ 5,640,387.88	n/a	n/a	n/a
2024	March	13,514	$ 5,180,959.77	n/a	n/a	n/a
2024	April	12,158	$ 3,962,244.73	n/a	n/a	n/a
2024	May	12,029	$ 3,235,966.00	n/a	n/a	n/a
2024	June	13,322	$ 3,130,687.74	n/a	n/a	n/a
2024	July	12,952	$ 2,794,962.87	n/a	n/a	n/a
2024	August	13,109	$ 2,364,133.64	n/a	n/a	n/a
2024	September	13,516	$ 2,270,528.76	n/a	n/a	n/a
2024	October	12,182	$ 1,902,972.27	n/a	n/a	n/a
2024	November	12,543	$ 1,970,826.06	n/a	n/a	n/a
2024	December	13,246	$ 2,240,063.43	n/a	n/a	n/a
2025	January	12,662	$ 2,502,560.26	n/a	n/a	n/a
2025	February	11,382	$ 2,742,722.59	n/a	n/a	n/a
2025	March	11,143	$ 3,191,680.38	n/a	n/a	n/a
2025	April	10,598	$ 2,682,100.33	n/a	n/a	n/a
2025	May	10,385	$ 2,273,971.64	n/a	n/a	n/a
2025	June	10,483	$ 2,020,252.32	n/a	n/a	n/a
2025	July	10,298	$ 1,805,453.89	n/a	n/a	n/a
2025	August	10,502	$ 1,648,433.50	n/a	n/a	n/a
2025	September	10,731	$ 1,632,565.00	n/a	n/a	n/a
2025	October	10,615	$ 1,613,735.25	n/a	n/a	n/a
2025	November	11,475	$ 1,880,169.95	n/a	n/a	n/a
2025	December	11,679	$ 2,140,612.89	n/a	n/a	n/a
2026	January	11,651	$ 2,630,340.97	n/a	n/a	n/a

Year	Month	CAUSE-PA-I-24 c. (total debt) - CLI	CAUSE-PA-I-24 d. (number) - CLI excluding CAP	CAUSE-PA-I-24 d. (total debt) CLI excluding CAP	CAUSE-PA-I-24 e. (number) - CAP	CAUSE-PA-I-24 e. (total debt) - CAP
2023	January	n/a	5,000	$ 3,019,039.58	n/a	n/a
2023	February	n/a	4,387	$ 2,909,143.60	n/a	n/a
2023	March	n/a	4,311	$ 2,925,901.85	n/a	n/a
2023	April	n/a	4,215	$ 2,513,944.32	n/a	n/a
2023	May	n/a	3,275	$ 1,723,110.12	n/a	n/a
2023	June	n/a	2,989	$ 1,308,194.19	n/a	n/a
2023	July	n/a	2,908	$ 1,257,746.95	n/a	n/a
2023	August	n/a	2,932	$ 1,230,966.80	n/a	n/a
2023	September	n/a	3,189	$ 1,320,853.86	n/a	n/a
2023	October	n/a	3,040	$ 1,374,886.55	n/a	n/a
2023	November	n/a	3,391	$ 1,556,817.29	n/a	n/a
2023	December	n/a	4,251	$ 2,217,291.10	n/a	n/a
2024	January	n/a	4,966	$ 2,961,810.09	n/a	n/a
2024	February	n/a	4,489	$ 2,814,131.77	n/a	n/a
2024	March	n/a	4,394	$ 2,514,260.12	n/a	n/a
2024	April	n/a	3,861	$ 1,841,185.80	n/a	n/a
2024	May	n/a	3,263	$ 1,325,701.13	n/a	n/a
2024	June	n/a	3,272	$ 1,184,133.93	n/a	n/a
2024	July	n/a	3,121	$ 1,075,384.99	n/a	n/a
2024	August	n/a	3,049	$ 878,378.86	n/a	n/a
2024	September	n/a	3,102	$ 828,817.51	n/a	n/a
2024	October	n/a	2,648	$ 658,165.55	n/a	n/a
2024	November	n/a	2,749	$ 713,277.07	n/a	n/a
2024	December	n/a	2,987	$ 802,788.48	n/a	n/a
2025	January	n/a	3,311	$ 995,593.34	n/a	n/a
2025	February	n/a	3,250	$ 1,163,414.00	n/a	n/a
2025	March	n/a	3,259	$ 1,332,467.83	n/a	n/a
2025	April	n/a	2,960	$ 1,014,447.72	n/a	n/a
2025	May	n/a	2,681	$ 817,095.67	n/a	n/a
2025	June	n/a	2,489	$ 1,582,108.41	n/a	n/a
2025	July	n/a	2,460	$ 604,882.73	n/a	n/a
2025	August	n/a	2,200	$ 542,660.14	n/a	n/a
2025	September	n/a	2,192	$ 529,762.95	n/a	n/a
2025	October	n/a	2,297	$ 555,655.51	n/a	n/a
2025	November	n/a	2,616	$ 670,988.53	n/a	n/a
2025	December	n/a	2,618	$ 752,259.70	n/a	n/a
2026	January	n/a	3,033	$ 1,046,262.04	n/a	n/a

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From January 2023 to date, disaggregated by month and year, as of the last day of the month/year, please provide the total dollars in debt and the average arrearage level for each of the following NFG customer segments: a) All residential NFG customers; b) Residential NFG customers, excluding confirmed low income customers and CAP customers; c) Confirmed low income NFG customers; d) Confirmed low income NFG customers, excluding CAP customers; e) NFG CAP customers. Please provide this data in a live excel spreadsheet

Response

See Attachment Cause-PA-I-26 Revised for (a) All residential NFG customers and (d) Confirmed low income NFG customers, excluding CAP customers. There is no data to report for items (b), (c), and (e) as the Company does not track this information for CAP customers. Updated data for January 2026 has been added.

Year	Month	CAUSE-PA-I-26 a. (total debt) - All Res	CAUSE-PA-I-26 a. (avg. debt) - All Res	CAUSE-PA-I-26 b. (total debt) - exlude CLI and CAP	CAUSE-PA-I-26 b. (avg. debt) - exclude CLI and CAP
2023	January	$ 7,986,351.08	$ 412.37	n/a	n/a
2023	February	$ 7,831,065.44	$ 447.26	n/a	n/a
2023	March	$ 8,433,943.67	$ 474.78	n/a	n/a
2023	April	$ 8,381,158.45	$ 449.61	n/a	n/a
2023	May	$ 7,437,414.42	$ 421.43	n/a	n/a
2023	June	$ 7,127,186.23	$ 387.18	n/a	n/a
2023	July	$ 7,088,921.08	$ 378.10	n/a	n/a
2023	August	$ 6,736,466.00	$ 358.86	n/a	n/a
2023	September	$ 7,189,709.95	$ 352.75	n/a	n/a
2023	October	$ 7,122,641.09	$ 364.27	n/a	n/a
2023	November	$ 7,287,806.89	$ 367.09	n/a	n/a
2023	December	$ 7,885,526.83	$ 368.57	n/a	n/a
2024	January	$ 8,125,593.13	$ 402.28	n/a	n/a
2024	February	$ 7,662,799.20	$ 424.34	n/a	n/a
2024	March	$ 7,765,969.69	$ 424.21	n/a	n/a
2024	April	$ 7,005,208.11	$ 395.62	n/a	n/a
2024	May	$ 6,238,829.09	$ 352.20	n/a	n/a
2024	June	$ 6,040,026.95	$ 320.60	n/a	n/a
2024	July	$ 5,623,437.21	$ 304.68	n/a	n/a
2024	August	$ 5,392,107.81	$ 284.63	n/a	n/a
2024	September	$ 5,461,082.89	$ 278.98	n/a	n/a
2024	October	$ 5,387,737.51	$ 288.89	n/a	n/a
2024	November	$ 5,743,387.00	$ 299.67	n/a	n/a
2024	December	$ 6,163,254.65	$ 309.65	n/a	n/a
2025	January	$ 6,691,221.02	$ 345.12	n/a	n/a
2025	February	$ 6,915,930.38	$ 383.24	n/a	n/a
2025	March	$ 6,863,431.83	$ 390.03	n/a	n/a
2025	April	$ 5,978,204.85	$ 348.20	n/a	n/a
2025	May	$ 5,601,004.80	$ 329.61	n/a	n/a
2025	June	$ 5,486,368.91	$ 318.09	n/a	n/a
2025	July	$ 5,424,187.30	$ 315.95	n/a	n/a
2025	August	$ 5,279,798.66	$ 304.35	n/a	n/a
2025	September	$ 5,298,732.04	$ 301.85	n/a	n/a
2025	October	$ 5,562,166.39	$ 315.73	n/a	n/a
2025	November	$ 6,341,839.43	$ 338.16	n/a	n/a
2025	December	$ 6,937,670.90	$ 368.01	n/a	n/a
2026	January	$ 7,895,373.34	$ 415.63	n/a	n/a

Year	Month	CAUSE-PA-I-26 c. (total debt) - CLI	CAUSE-PA-I-26 c. (avg. debt) - CLI	CAUSE-PA-I-26 d. (total debt) - CLI exlcude CAP	CAUSE-PA-I-26 d. (avg. debt) - CLI exclude CAP	CAUSE-PA-I-26 e. (total debt) - CAP	CAUSE-PA-I-26 e. (avg. debt) - CAP
2023	January	n/a	n/a	$ 3,759,955.17	$ 600.15	n/a	n/a
2023	February	n/a	n/a	$ 3,606,489.24	$ 638.77	n/a	n/a
2023	March	n/a	n/a	$ 3,839,671.63	$ 662.58	n/a	n/a
2023	April	n/a	n/a	$ 3,675,574.35	$ 609.85	n/a	n/a
2023	May	n/a	n/a	$ 3,024,405.55	$ 557.49	n/a	n/a
2023	June	n/a	n/a	$ 2,806,685.66	$ 518.70	n/a	n/a
2023	July	n/a	n/a	$ 2,906,572.16	$ 519.96	n/a	n/a
2023	August	n/a	n/a	$ 2,873,694.68	$ 508.89	n/a	n/a
2023	September	n/a	n/a	$ 3,084,320.06	$ 516.46	n/a	n/a
2023	October	n/a	n/a	$ 3,126,936.93	$ 541.84	n/a	n/a
2023	November	n/a	n/a	$ 3,265,948.83	$ 543.60	n/a	n/a
2023	December	n/a	n/a	$ 3,530,803.32	$ 557.70	n/a	n/a
2024	January	n/a	n/a	$ 3,793,306.85	$ 584.57	n/a	n/a
2024	February	n/a	n/a	$ 3,563,026.36	$ 600.44	n/a	n/a
2024	March	n/a	n/a	$ 3,509,134.19	$ 576.97	n/a	n/a
2024	April	n/a	n/a	$ 3,095,151.48	$ 513.29	n/a	n/a
2024	May	n/a	n/a	$ 2,598,272.50	$ 471.04	n/a	n/a
2024	June	n/a	n/a	$ 2,391,865.91	$ 439.20	n/a	n/a
2024	July	n/a	n/a	$ 2,317,235.29	$ 434.92	n/a	n/a
2024	August	n/a	n/a	$ 2,269,511.15	$ 411.44	n/a	n/a
2024	September	n/a	n/a	$ 2,316,175.94	$ 404.43	n/a	n/a
2024	October	n/a	n/a	$ 2,327,608.78	$ 421.74	n/a	n/a
2024	November	n/a	n/a	$ 2,529,802.70	$ 443.36	n/a	n/a
2024	December	n/a	n/a	$ 2,648,062.04	$ 445.35	n/a	n/a
2025	January	n/a	n/a	$ 3,001,928.42	$ 475.14	n/a	n/a
2025	February	n/a	n/a	$ 3,148,449.11	$ 510.20	n/a	n/a
2025	March	n/a	n/a	$ 2,983,780.97	$ 499.71	n/a	n/a
2025	April	n/a	n/a	$ 2,487,172.24	$ 434.82	n/a	n/a
2025	May	n/a	n/a	$ 2,250,741.45	$ 416.88	n/a	n/a
2025	June	n/a	n/a	$ 3,164,216.82	$ 590.67	n/a	n/a
2025	July	n/a	n/a	$ 2,278,459.43	$ 423.35	n/a	n/a
2025	August	n/a	n/a	$ 2,204,066.08	$ 430.15	n/a	n/a
2025	September	n/a	n/a	$ 2,199,232.04	$ 434.89	n/a	n/a
2025	October	n/a	n/a	$ 2,771,254.72	$ 481.96	n/a	n/a
2025	November	n/a	n/a	$ 3,235,491.16	$ 513.49	n/a	n/a
2025	December	n/a	n/a	$ 3,492,726.78	$ 565.81	n/a	n/a
2026	January	n/a	n/a	$ 4,107,714.03	$ 614.56	n/a	n/a

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From January 2023 to date, disaggregated by month and year, as of the last day of the month/year, please provide the total dollars in debt and the average arrearage level for each of the following NFG customer segments: a) All residential NFG customers; b) Residential NFG customers, excluding confirmed low income customers and CAP customers; c) Confirmed low income NFG customers; d) Confirmed low income NFG customers, excluding CAP customers; e) NFG CAP customers. Please provide this data in a live excel spreadsheet

Response

See Attachment Cause-PA-I-26 Revised for (a) All residential NFG customers and (d) Confirmed low income NFG customers, excluding CAP customers. There is no data to report for items (b), (c), and (e) as the Company does not track this information for CAP customers. Updated data for January 2026 has been added.

See Attachment Cause-PA-I-26 (2) for available NFG CAP customer arrearages related to section (e). This separates the customers balance eligible for debt forgiveness from unpaid current bills. This data is not available for past periods and is only available for a current period, dated March 26th, 2026.

Year	Month	CAUSE-PA-I-26 e. (total debt - elligible for debt forgiveness) - CAP	CAUSE-PA-I-26 e. (avg. debt) - CAP	CAUSE-PA-I-26 e. (total debt - unpaid current bills) - CAP	CAUSE-PA-I-26 e. (avg. debt) - CAP
2026	March	$ 1,328,570.35	$ 201.30	$ 291,014.01	$ 205.37

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From January 2023 to date, disaggregated by month and year, as of the last day of the month/year, how many LIURP jobs were completed by NFG, excluding jobs completed as part of the LC-LIURP pilot?

Response

See Attachment Cause-PA-II-01.

Year-Month	LIURP Jobs excluding LC-LIURP
2023	73
Jan-23	9
Feb-23	4
Mar-23	6
Apr-23	3
May-23	7
Jun-23	8
Jul-23	3
Aug-23	8
Sep-23	8
Oct-23	6
Nov-23	11
Dec-23	0
2024	89
Jan-24	8
Feb-24	4
Mar-24	4
Apr-24	9
May-24	5
Jun-24	5
Jul-24	13
Aug-24	16
Sep-24	7
Oct-24	14
Nov-24	4
Dec-24	0
2025	167
Jan-25	12
Feb-25	22
Mar-25	14
Apr-25	12
May-25	10
Jun-25	19
Jul-25	18
Aug-25	15
Sep-25	15
Oct-25	20
Nov-25	9
Dec-25	1
2026	22
Jan-26	16
Feb-26	6

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

From January 2023 to date, disaggregated by month and year, as of the last day of the month/year, how many LC-LIURP jobs were completed by NFG? Please provide this data in a live excel spreadsheet.

Response

See Attachment Cause-PA-II-04.

Year-Month	Completed LC-LIURP jobs
2023	5
2023-01	5
2023-02	0
2023-03	0
2023-04	0
2023-05	0
2023-06	0
2023-07	0
2023-08	0
2023-09	0
2023-10	0
2023-11	0
2023-12	0
2024	12
2024-01	0
2024-02	0
2024-03	1
2024-04	1
2024-05	0
2024-06	2
2024-07	1
2024-08	1
2024-09	3
2024-10	1
2024-11	1
2024-12	1
2025	20
2025-01	6
2025-02	2
2025-03	2
2025-04	2
2025-05	1
2025-06	2
2025-07	1
2025-08	1
2025-09	1
2025-10	1
2025-11	1
2025-12	0
2026	1
2026-01	1
2026-02	0

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please refer to the September 2024 NFG LIURP Needs Assessment prepared by APPRISE and available on the Commission's website at https://www.puc.pa.gov/pcdocs/1853360.pdf. Please confirm that this is the most recent LIURP needs assessment completed for NFG and that there are no other LIURP needs assessments that have not yet been approved. If NFG has prepared and submitted a needs assessment that has not yet been approved, please provide a copy. Please also specifically describe any changes that NFG implemented as a result of the September 2024 LIURP needs assessment.

Response

The September 2024 LIURP Needs Assessment prepared by APPRISE is the most recent LIURP needs assessment completed by the Company and there are no assessments pending approval.

As a result of the 2024 LIURP Needs Assessment, the Company has increased its outreach efforts to improve awareness of the program. These steps include attending new events and locations across the service territory where more information was available at these events to inform attendees about LIURP. The Company has also taken steps to find contractors who can handle additional and more consistent work. These efforts have proven to be successful as the Company has seen an increase in LIURP spending and LIURP jobs completed as seen in response Cause-PA-II-14.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Assuming that NFG treats an identical number of low income units as will be treated through LIURP in the current fiscal year, and assuming no unit will be retreated, please indicate the number of years it would take to treat 100% of the low income units identified in the above requested needs assessment(s).

Response

The 2024 LIURP Needs Assessment provided by APPRISE states that there are approximately 213,493 households in the Company's territory with gas bills, of which 18% are low-income customers (38,429). Using the best available data, the Company completed a total of 187 LIURP jobs in calendar year 2025. With this information, it would take the Company approximately 206 years to treat 100% of these eligible households in its service territory. However, not all low-income customers would meet the yearly consumption threshold level of 1300 CCF for LIURP or 900 CCF for LC-LIURP.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please indicate for each year from January 2023 to date, disaggregated by year, as of the last day of the year for NFG: a) The total amount of budgeted LIURP dollars; b) The total amount of LIURP dollars spent for service delivery (e.g. measures, installation, and weatherization services), including dollars spent for health and safety remediation and for incidental repairs; c) The total amount of LIURP dollars spent for program administration; d) Of the amount listed in part b, what is the total amount of LIURP dollars spent on the installation of measures and weatherization. e) Of the amount listed in part b, what is the total amount of LIURP dollars spent for health and safety remediation; f) Of the amount listed in part b, what is the total amount of LIURP dollars spent for incidental repairs. Please provide this data in a live excel spreadsheet.

Response

See Attachment Cause-PA-II-09.

Section A

Year	Budgeted LIURP Dollars
2023	$3,388,596.46
2024	$3,758,861.62
2025	$3,702,157.99
2026	$2,841,879.24

Section B

Year	Total amount of LIURP dollars spent for service delivery
2023	$551,132.18
2024	$765,770.30
2025	$1,289,646.41
2026 (YTD February)	$188,470.87

Section C

Year	The total amount of LIURP dollars spent for program administration
2023	$62,892.72
2024	$74,878.50
2025	$63,789.57
2026 (YTD February)	$6,707.79

Section D

Year	Of the amount listed in part b, what is the total amount of LIURP dollars spent on the installation of measures and weatherization
2023	$534,345.19
2024	$734,808.35
2025	$1,206,692.39
2026	$180,678.45

Section E

Year	Of the amount listed in part b, what is the total amount of LIURP dollars spent for health and safety remediation
2023	$16,786.99
2024	$30,961.95
2025	$82,954.02
2026	$7,792.42

Section F

Year	Of the amount listed in part b, what is the total amount of LIURP dollars spent for incidental repairs
2023	This is included in Section E
2024	This is included in Section E
2025	This is included in Section E
2026	This is included in Section E

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please indicate for each year from January 2022 to date disaggregated by year, as of the last day of the year, whether: a) NFG exhausted its LIURP budget; b) If such budget was not exhausted, the number of dollars not spent; c) If such budget was exhausted, the number of NFG customers who did not receive LIURP services despite having been found to be LIURP eligible. Please provide this data in a live Excel spreadsheet.

Response

See Attachment Cause-PA-II-10. Note that the Company does not have the information in section (c) as this information is not tracked.

Section A	
Year	NFG exhausted its LIURP budget
2022	No
2023	No
2024	No
2025	No
2026	N/A

Section B	
Year	If such budget was not exhausted, the number of dollars not spent
2022	$2,088,596.46
2023	$2,367,861.62
2024	$2,311,157.99
2025	$1,450,879.24
2026	N/A

Section C	
Year	If such budget was exhausted, the number of NFG customers who did not receive LIURP services despite having been found to be LIURP eligible
2022	N/A
2023	N/A
2024	N/A
2025	N/A
2026	N/A

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
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Question

For January 2023 to date, disaggregated by month and year, as of the last day of the month/year, please indicate the number of applicants for NFG LIURP services, disaggregated by the following customer segments: a) Homeowners; b) Tenants; c) Single family homes; d) Multifamily, single metered homes; and e) Multifamily, master metered homes. Please provide this data in a live Excel spreadsheet.

Response

See Attachment Cause-PA-II-15. Note that the Company does not track information for sections (c), (d), or (e).

Sections A and B

Year-Month	Homeowner (A)	Tenants (B)	N/A (Housing type not available)
2023	145	172	4
2023-01	29	32	0
2023-02	20	21	0
2023-03	22	17	1
2023-04	14	26	0
2023-05	0	0	0
2023-06	8	14	0
2023-07	1	0	0
2023-08	16	13	1
2023-09	12	19	0
2023-10	15	17	2
2023-11	0	0	0
2023-12	8	13	0
2024	211	189	4
2024-01	15	26	0
2024-02	7	7	0
2024-03	12	8	0
2024-04	23	18	0
2024-05	32	30	0
2024-06	55	41	2
2024-07	17	25	0
2024-08	0	0	0
2024-09	35	27	1
2024-10	14	7	1
2024-11	1	0	0
2023-12	0	0	0
2025	485	505	14
2025-01	42	65	0
2025-02	17	20	1
2025-03	20	19	0
2025-04	53	40	3
2025-05	44	28	0
2025-06	30	22	0
2025-07	73	89	0
2025-08	49	74	4
2025-09	31	37	0
2025-10	37	38	2
2025-11	52	50	2
2025-12	37	23	2
2026	87	97	2
2026-01	57	67	0

2026-02	30	30	2

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

For January 2023 to date, disaggregated by month and year (as of the last day of the month/year), please indicate for NFG: a) The average amount of approved hardship fund grants; b) The total dollar value of approved hardship fund grants; c) The total grant dollars available through the hardship fund program; d) The total administrative cost of the hardship fund program; e) Any months in which hardship fund grant funding was fully depleted. Please provide this data in a live Excel spreadsheet.

Response

See Attachment Cause-PA-II-21.

Year	Month	a) CAUSE-PA-II-21	b) CAUSE-PA-II-21	c) CAUSE-PA-II-21	d) CAUSE-PA-II-21	e) CAUSE-PA-II-21
2023	January	$427.91	$2,995.36	$298,445.69	$2,705.00	No
2023	February	$387.80	$15,124.30	$296,153.93	$855.00	No
2023	March	$341.03	$8,866.83	$283,756.84	$525.00	No
2023	April	$426.72	$12,374.78	$277,771.08	$3,425.00	No
2023	May	$411.20	$7,812.83	$266,067.97	$1,590.00	No
2023	June	$342.86	$13,028.60	$260,143.54	$105.00	No
2023	July	$383.08	$12,258.62	$250,919.22	$2,500.00	No
2023	August	$377.22	$21,124.35	$236,160.60	$1,240.00	No
2023	September	$380.13	$21,287.31	$309,483.39	$5,995.00	No
2023	October	$361.96	$13,030.51	$281,784.46	$245.00	No
2023	November	$355.84	$7,828.52	$272,068.82	$0.00	No
2023	December	$381.59	$6,487.02	$265,627.80	$6,987.02	No
2024	January	$366.03	$1,830.17	$256,995.78	$0.00	No
2024	February	$322.97	$6,782.30	$262,442.99	$910.00	No
2024	March	$355.42	$8,885.39	$246,527.33	$2,755.00	No
2024	April	$347.03	$5,552.50	$243,817.30	$0.00	No
2024	May	$372.89	$21,254.98	$225,190.13	$0.00	No
2024	June	$329.41	$8,894.11	$217,187.88	$2,240.00	No
2024	July	$391.60	$9,006.78	$207,236.10	$945.00	No
2024	August	$398.86	$17,948.63	$191,332.98	$0.00	No
2024	September	$361.96	$13,030.51	$275,894.63	$0.00	No
2024	October	$378.64	$15,902.87	$261,236.69	$0.00	No
2024	November	$406.90	$7,324.14	$254,097.60	$1,365.00	No
2024	December	$433.24	$7,798.29	$250,376.67	$0.00	No
2025	January	$350.24	$9,806.83	$246,269.62	$0.00	No
2025	February	$351.93	$2,815.45	$227,328.57	$0.00	No
2025	March	$357.40	$21,443.95	$214,248.40	$175.00	No
2025	April	$375.99	$19,175.24	$198,453.84	$0.00	No
2025	May	$374.62	$40,833.06	$154,964.70	$2,770.00	No
2025	June	$380.85	$25,516.98	$128,502.72	$945.00	No
2025	July	$402.79	$25,778.38	$105,863.62	$0.00	No
2025	August	$414.22	$40,179.72	$60,652.78	$5,395.00	No
2025	September	$414.16	$38,516.50	$123,827.59	$6,945.00	No
2025	October	$428.27	$28,693.96	$79,629.67	$0.00	No
2025	November	$383.74	$37,606.20	$45,147.18	$0.00	No
2025	December	$350.81	$12,629.04	$29,612.52	$3,015.00	No
2026	January	$355.12	$13,139.52	$16,852.65	$2,520.00	No

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

For 2023 to date, disaggregated by year, as of the last day of the year, please indicate the amount of contributions to NFG's hardship fund program, and indicate the source(s) these contributions. Please also indicate what NFG projects as the annual contribution amount to the hardship fund program for 2026, 2027, and 2028, disaggregated by year, and the source(s) of contribution of these funds.

Response

Note that data is only available from October 2023 forward. See Attachment Cause-PA-II-22 for available data.

Year	Month	Customer Donations	NFG Contribution	Direct Donations	Actual/Projected
2023	January	$3,676.88	N/A	N/A	Actual
2023	February	$3,368.60	N/A	N/A	Actual
2023	March	$3,582.21	N/A	N/A	Actual
2023	April	$3,406.07	N/A	N/A	Actual
2023	May	$4,096.67	N/A	N/A	Actual
2023	June	$3,478.40	N/A	N/A	Actual
2023	July	$3,909.28	N/A	N/A	Actual
2023	August	N/A	N/A	N/A	Actual
2023	September	$3,625.52	N/A	N/A	Actual
2023	October	$3,847.81	$0.00	$0.00	Actual
2023	November	$2,209.42	$0.00	$60.00	Actual
2023	December	$4,243.50	$0.00	$0.00	Actual
2024	January	$0.00	$0.00	$0.00	Actual
2024	February	$3,281.70	$0.00	$325.00	Actual
2024	March	$3,665.20	$0.00	$0.00	Actual
2024	April	$3,587.47	$0.00	$0.00	Actual
2024	May	$3,487.81	$0.00	$0.00	Actual
2024	June	$3,631.86	$0.00	$0.00	Actual
2024	July	$0.00	$0.00	$0.00	Actual
2024	August	$3,305.51	$0.00	$0.00	Actual
2024	September	$3,941.16	$92,000.00	$0.00	Actual
2024	October	$0.00	$0.00	$0.00	Actual
2024	November	$3,310.05	$0.00	$0.00	Actual
2024	December	$3,477.36	$0.00	$0.00	Actual
2025	January	$6,631.45	$0.00	$170.00	Actual
2025	February	$2,935.94	$0.00	$0.00	Actual
2025	March	$3,207.25	$0.00	$0.00	Actual
2025	April	$6,540.55	$0.00	$0.00	Actual
2025	May	$3,198.39	$0.00	$0.00	Actual
2025	June	$0.00	$0.00	$0.00	Actual
2025	July	$3,108.96	$0.00	$0.00	Actual
2025	August	$3,349.48	$0.00	$0.00	Actual
2025	September	$3,000.81	$92,000.00	$0.00	Actual
2025	October	$2,990.39	$0.00	$0.00	Actual
2025	November	$3,123.91	$0.00	$0.00	Actual
2025	December	$3,162.74	$0.00	$0.00	Actual
2026	January	$2,828.70	$0.00	$0.00	Actual
2026	February	$3,000.00	$0.00	$0.00	Projected
2026	March	$3,000.00	$0.00	$0.00	Projected
2026	April	$3,000.00	$0.00	$0.00	Projected
2026	May	$3,000.00	$0.00	$0.00	Projected
2026	June	$3,000.00	$0.00	$0.00	Projected
2026	July	$3,000.00	$0.00	$0.00	Projected

2026	August	$3,000.00	$0.00	$0.00	Projected
2026	September	$3,000.00	$92,000.00	$0.00	Projected
2026	October	$3,000.00	$0.00	$0.00	Projected
2026	November	$3,000.00	$0.00	$0.00	Projected
2026	December	$3,000.00	$0.00	$0.00	Projected
2027	January	$3,000.00	$0.00	$0.00	Projected
2027	February	$3,000.00	$0.00	$0.00	Projected
2027	March	$3,000.00	$0.00	$0.00	Projected
2027	April	$3,000.00	$0.00	$0.00	Projected
2027	May	$3,000.00	$0.00	$0.00	Projected
2027	June	$3,000.00	$0.00	$0.00	Projected
2027	July	$3,000.00	$0.00	$0.00	Projected
2027	August	$3,000.00	$0.00	$0.00	Projected
2027	September	$3,000.00	$92,000.00	$0.00	Projected
2027	October	$3,000.00	$0.00	$0.00	Projected
2027	November	$3,000.00	$0.00	$0.00	Projected
2027	December	$3,000.00	$0.00	$0.00	Projected
2028	January	$3,000.00	$0.00	$0.00	Projected
2028	February	$3,000.00	$0.00	$0.00	Projected
2028	March	$3,000.00	$0.00	$0.00	Projected
2028	April	$3,000.00	$0.00	$0.00	Projected
2028	May	$3,000.00	$0.00	$0.00	Projected
2028	June	$3,000.00	$0.00	$0.00	Projected
2028	July	$3,000.00	$0.00	$0.00	Projected
2028	August	$3,000.00	$0.00	$0.00	Projected
2028	September	$3,000.00	$92,000.00	$0.00	Projected
2028	October	$3,000.00	$0.00	$0.00	Projected
2028	November	$3,000.00	$0.00	$0.00	Projected
2028	December	$3,000.00	$0.00	$0.00	Projected

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Question

Please refer to NFG Statement No. 18 (Solomon) at 10:18-21. “Under this proposal, if a low-income customer is exempt from paying Rider D and chooses to participate in the EE Program, the associated costs would be equitably shared among the broader residential customer class—consistent with established regulatory precedent for socializing costs that deliver system-wide benefits.” Please specifically describe all circumstances under which a low income customer would be exempt from paying Rider D.

Response

The referenced statement was intended to address a hypothetical cost allocation principle and does not reflect the Company’s proposed Rider D design.

Under the Company’s proposal, there are no circumstances under which a low income customer would be exempt from paying Rider D. Rider D is a uniformly applicable, class based cost recovery mechanism that applies to all residential customers, including customers participating in the Company’s low income assistance programs. Rider D does not include exemptions, waivers, or exclusions based on income status, program participation, or customer classification within the residential class.

All residential customers, including those served under the Customer Assistance Program or Low Income Usage Reduction Program, continue to pay Rider D in the same manner as other residential customers. Participation in low income assistance or energy efficiency programs does not alter a customer’s obligation to pay Rider D.

Accordingly, the statement at page 10:18–21 does not describe an operative tariff provision or proposed exemption. Rather, it reflects a general regulatory concept that, if costs were ever to be incurred on behalf of customers not directly contributing through a rider, those costs would be allocated in a manner consistent with established ratemaking precedent. That circumstance does not arise under the Company’s proposal because all residential customers, including low income customers, contribute to Rider D.

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Question

Please refer to NFG St. No. 18 (Solomon) at 5:5-15. Would rebates provided through NFG's proposed energy efficiency program cover at least 100% of the incremental cost to purchase eligible equipment over baseline equipment? If not, please explain in detail why not.

Response

No. Rebates provided through the Company's proposed Energy Efficiency ("EE") Program would not cover at least 100 percent of the incremental cost to purchase eligible equipment over baseline equipment.

As reflected in the same worksheet used to respond to Cause PA18, the proposed rebates generally offset only a portion of the incremental installed cost associated with upgrading from baseline equipment to higher efficiency equipment for each eligible measure, including high efficiency furnaces and boilers, high efficiency water heaters, and ENERGY STAR® certified natural gas clothes dryers.

The Company intentionally designed rebate amounts at levels determined to be sufficient to provide customers with a reasonable payback period, rather than to fully reimburse the incremental cost of higher efficiency equipment. Requiring customers to retain some portion of the incremental cost promotes informed investment decisions, reflects expected energy savings over the useful life of the equipment, and helps manage overall program costs and participation levels consistent with the pilot nature of the program.

Accordingly, while the proposed rebates meaningfully reduce the upfront cost of eligible high efficiency equipment, they are not intended to cover 100 percent of incremental costs, but instead to support reasonable customer payback and sustained participation in the EE Pilot.

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Question

Has NFG analyzed the ability of low income customers to access the proposed energy efficiency program? If the answer is yes or in the affirmative, please describe this analysis and indicate when this analysis was conducted. Please also describe in detail the results of this analysis, and provide a copy of this analysis or other document(s) which describe this analysis.

Response

No. National Fuel Gas Distribution Corporation ("National Fuel" or the "Company") has not conducted a standalone analysis specifically evaluating the ability of low income ("LI") customers to access the proposed Energy Efficiency Pilot Program ("EE Pilot").

At this time, the Company does not have an estimate of the number of LI customers that may participate in the EE Pilot. The proposed effort is a pilot program, and participation levels are uncertain because the Company does not yet know how many LI customers will choose to enroll. Accordingly, any participation estimates would be speculative. National Fuel plans to incorporate a tracking mechanism into its application process to capture and monitor participation information.

As discussed in NFG Statement No. 18 (Solomon), the EE Pilot is not a low income exclusive program. Rather, it is intended to complement and coordinate with existing low income assistance initiatives administered by National Fuel, including the Customer Assistance Program ("CAP") and the Low Income Usage Reduction Program ("LIURP"), as well as other state or federally administered low income assistance programs.

The EE Pilot is designed to expand energy efficiency opportunities for customers who may not qualify for, or may not yet receive, more comprehensive services through existing low income programs, while avoiding duplication of those efforts.

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Question

See NFG St. No. 18 (Solomon) at 8: 6-9. Please provide a copy the full Total Resource Cost (TRC) analysis performed by NFG, or by any third party on behalf of NFG, that analyzed the Company's proposed energy efficiency program. Please provide any and all workbooks used to perform the analysis in live Excel format.

Response

Refer to the attached workbooks which together comprise the TRC analysis conducted by our consultant. The external links have been removed, however the BCA Model FY27-FY31 workbook links to the BCA Model Assumptions FY27-FY31 workbook, so both need to be open at the same time for data to flow through to the results. If you want to change the name of the BCA Model Assumptions FY27-FY31 workbook, it will also need to be updated where it is referenced in formulas within the BCA Model FY27-FY31 workbook.

In preparation of this response, NFG found that the cost-benefit model had inadvertently used the $100,000 annual administrative value indicated Table 2 of National Fuel Statement No. 18 for the Outreach/Marketing/Trade Ally Co-op costs. This resulted in slightly overstated program costs in the cost effectiveness model because the model did not reflect the declining Outreach/Marketing/Trade Ally Co-op costs. Table 3 corrects that error.

Table 3. TRC Analysis Results - Corrected

Metric	Value
TRC Benefits	$3,932,053
TRC Costs	$3,721,313
Net Benefits	$210,741
TRC Ratio	1.06

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Question

Please refer to NFG St. No. 18 (Solomon) at 10:22 – 11:1-5. Please explain in detail how NFG proposes to integrate its Emergency Heating Repair and Replacement Program ("ERRP") with its proposed energy efficiency program.

Response

As described in NFG Statement No. 18 (Solomon) at 10:22–11:1-5, National Fuel Gas Distribution Corporation ("National Fuel" or the "Company") proposes to integrate its Emergency Heating Repair and Replacement Program ("ERRP") with the proposed Energy Efficiency Pilot Program ("EE Pilot") in a coordinated manner to ensure customers experiencing heating system failure are directed to the most appropriate form of assistance.

Under this integrated approach, customers who report a loss of heat or a heating system failure are first evaluated for ERRP eligibility. If a customer qualifies for ERRP, the program addresses the emergency condition by providing repair or replacement of the heating equipment in full, consistent with ERRP's purpose of restoring safe and reliable heating service for vulnerable households.

If a customer does not qualify for ERRP, National Fuel would direct the customer to the EE Pilot as an alternative pathway for assistance. In these cases, the customer would be informed of the availability of EE rebates and provided with an application to help offset the cost of replacing worn out or inefficient equipment with higher efficiency equipment. This ensures that customers who fall outside ERRP eligibility criteria are still offered an opportunity to receive financial support when replacing failed or end of life heating equipment.

This coordination ensures that:

- ERRP remains the primary program for addressing true heating emergencies through full repair or replacement; and

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- The EE Pilot serves as a complementary option for customers who are not ERRP eligible but are facing equipment replacement decisions, thereby supporting the installation of higher efficiency equipment where appropriate.

By integrating ERRP and the EE Pilot in this manner, National Fuel avoids duplicating assistance, preserves the emergency focus of ERRP, and provides a clear transition to EE rebates when emergency program eligibility is not met, consistent with the intent described in NFG Statement No. 18.

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Question

Please refer to NFG St. No. 17 (Stoops) at 3:13-16. “The Company has worked with DHS to receive income and household information for households that grant consent to share the information. This information is intended to allow customers to enroll or recertify in CAP without having to submit a new application or proof of income-eligibility.” Please specifically describe how NFG utilizes LIHEAP data received from the Pennsylvania Department of Human Services (DHS) to conduct outreach, recertification, and/or enrollment for its universal service programs. Please also provide a copy of all current letters, written communications, and/or outreach materials NFG uses to conduct outreach to LIHEAP recipients for enrollment in universal service programs.

Response

The Company receives a file from the Department of Human Services (DHS) of customers who consent to data sharing and who have their LIHEAP grant sent to the Company. When this file is received, the Company will send a customer who is not currently enrolled in CAP a simplified application, letter, and program information. If a recertification is needed, the Company will send a letter and program information advising the customer that they will continue to be on CAP.

When the customer receives this simplified application for enrollment, they are only required to choose a “Yes” or “No” response if they are willing to participate in the Company’s CAP program, sign, and date the application. The customer will then be enrolled in CAP when the signed agreement is received. The customer does not have to take any action when being recertified.

See CONFIDENTIAL Attachment Cause-PA-3-27 (1) for the Company’s simplified CAP application.

See CONFIDENTIAL Attachment Cause-PA-3-27 (2) for the Company’s recertification letter due to data sharing.

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Question

For customers identified as LIHEAP recipients through data sharing processes with DHS, please indicate, from August 1, 2024, to date, disaggregated by month and year, as of the last day of the month/ year: a) How many of its customers NFG attempted to contact through mail; b) How many of its customers NFG attempted to contact through email; c) How many customers NFG enrolled in CAP as a result of the outreach indicated in subsections (a) and (b), respectively; d) How many customers NFG recertified for CAP as a result of the outreach indicated in subsections (a) and (b), respectively. Please provide this data in a live Excel spreadsheet.

Response

The Company began processing data sharing files from DHS in August 2025. Please see Attachment Cause-PA-3-28 for available data.

Year	Month	a) CAUSE-PA-3-28	b) CAUSE-PA-3-28	c) CAUSE-PA-3-28	d) CAUSE-PA-3-28
2024	August	N/A	N/A	N/A	N/A
2024	September	N/A	N/A	N/A	N/A
2024	October	N/A	N/A	N/A	N/A
2024	November	N/A	N/A	N/A	N/A
2024	December	N/A	N/A	N/A	N/A
2025	January	N/A	N/A	N/A	N/A
2025	February	N/A	N/A	N/A	N/A
2025	March	N/A	N/A	N/A	N/A
2025	April	N/A	N/A	N/A	N/A
2025	May	N/A	N/A	N/A	N/A
2025	June	N/A	N/A	N/A	N/A
2025	July	N/A	N/A	N/A	N/A
2025	August	309	0	15	0
2025	September	632	0	106	3
2025	October	2	0	164	6
2025	November	187	0	32	1
2025	December	772	0	127	9
2026	January	1405	0	113	26
2026	February	6	0	58	7

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Question

If a customer is not compliant with the current NFG Tariff Rule 8, are they subject to refusal or termination of service under any rule or regulation, including pursuant to NFG Tariff Rule 11?

Response

The Company may terminate service for such reasons and on such notice as specified by the regulations of the Pennsylvania Public Utility Commission, the Pennsylvania Public Utility Code, or for other violation of these Rules and Regulations.

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Question

When NFG's authorized agents discover health and safety issues, such as rodent or pest infestation or the presence of excrement, debris, or other rubbish, at a residential customer's premises that prohibit "free access" to NFG- or customer-owned equipment, what procedure does NFG follow to secure access? Please also specifically indicate whether NFG provides referrals to housing remediation providers, social services providers, or any other resource for assistance remediating health and safety issues. Please provide a copy of all current written policies, procedures, training materials, or other documents that describe such procedures.

Response

National Fuel Gas (NFG) maintains a Safety Gatekeeper Program designed to ensure that employees can report concerns about customer well-being or unsafe conditions encountered in the field. While NFG encourages employees to remain attentive to signs that a customer may need assistance, the safety of employees is always a top priority.

When health or safety issues, such as unsanitary conditions, pest infestations, or debris, prevent safe and free access to NFG or customer owned equipment, NFG will require that these issues be corrected before employees are permitted to enter or work on the premises. This ensures that all work can be performed in a safe environment and in accordance with company safety protocols.

If an employee believes that a customer may need help beyond simply addressing access issues, the employee is to report the concern to their supervisor, who can then determine whether a referral to appropriate resources or support services is warranted.

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Below is NFG Gate Keeper Guidance:

At National Fuel, the safety of our employees, customers and community is our top priority. At this time of year, as our region prepares to enter the season of extremely cold temperatures and high levels of snow, it is especially important that we pay close attention to our neighbors and customers who may be in need of extra assistance.

Throughout our work across the Company, it's inevitable that we will encounter customers - whether it be a one-off occurrence or on a regular basis. It's imperative that we, as Safety Gatekeepers, are able to identify unusual or suspicious situations where customers and community members are in need of assistance.

Please watch and listen for possible warning signs that someone may require help, including:

- Un-shoveled driveways and walkways
- Snow covering home vents and exhausts
- Mail collecting in the mailbox or papers piling up on the porch
- Difficulty paying bills
- Declining condition of home
- Difficulty seeing, speaking, hearing or moving
- Unattended children or pets

Thank you for your active concern and for keeping these warning signs in mind as you interact with our customers. As you go about your everyday work activities, I encourage you to contact your supervisor if you believe someone requires assistance.

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Question

Please refer to NFG Response, Attachment CAUSE-PA II-21, indicating that as of January 2026, NFG's hardship fund had $16,852.65 of remaining available funds. As of the most recent date for which data is available, has NFG exhausted available funding in its hardship fund? If not, does NFG expect to exhaust available funding for its hardship fund during 2026? If yes, please indicate what in month of 2026 NFG expects that available hardship funding will be exhausted.

Response

The Company's hardship fund was depleted as of February 25, 2026, as a result of increased program demand.

To avoid suspension of the program, the Company elected to release its annual shareholder contribution of $92,000 earlier than usual. The early release of the annual contribution was intended to address the immediate funding shortfall and maintain program availability.

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Question

Please refer to NFG's response to CAUSE-PA I-2, indicating that NFG is evaluating for its hardship fund "Flexibility to change the grant amount based on demand." Please specifically explain: a) What specific flexibility NFG is evaluating related to changes to grant amounts based on demand; b) Whether and to what extent the flexibility would vary by any factor (e.g. customer income level, any non-income eligibility criteria, county). Please also provide a copy of all current or proposed written policies, procedures, or other documents which discuss NFG providing flexibility to change hardship fund grant amounts based on demand.

Response

a) The Company is evaluating the ability to introduce flexibility in the hardship fund grant amounts awarded based on demand. This flexibility will allow the Company to continue operating the program and support customers consistently throughout the year.

   Specifically, the Company is evaluating modifying the hardship fund program guidelines to allow:

   - The maximum grant amount to be adjusted downward during periods of elevated demand or reduced fund balances; and/or
   - The program administrator to adjust grant amounts based on overall program demand and available funding, with the goal of assisting a greater number of eligible customers over the course of the program year.

   Under these modifications, the hardship fund would continue to provide meaningful assistance to eligible applicants, but individual awards could be adjusted to help prevent premature depletion of the fund and avoid temporary program suspensions.

b) At this time, the Company is not evaluating flexibility that would vary by factors such as customer income level, non-income eligibility criteria, or geographic location.

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Eligibility criteria and screening requirements would continue to apply uniformly across applicants.

Rather, the flexibility under consideration relates to program level conditions, such as overall demand for grants during a given period and the availability of program funds relative to projected need.

Grant amounts would continue to be determined through the existing intake and review process based on an applicant's circumstances and documented need, but within adjusted program parameters intended to preserve the availability of assistance throughout the year.

No formal written policy or procedure has been finalized or adopted that specifically governs flexibility to change hardship fund grant amounts based on demand.

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Question

From January 2023 to date, disaggregated by month and year (as of the last day of the month/year), please provide: a) The number of hardship fund grant applications NFG received from NFG non-customers; b) The number of non-customers who received a hardship fund grant; c) The number of hardship fund grants issued to NFG non-customers; d) The total dollar amount of NFG hardship fund grants issued to NFG non-customers. Please provide this data in a live Excel spreadsheet.

Response

See Attachment Cause-PA-4-20. Note that for section (a), the number of applications received is not tracked. Sections (b) and (c) would be the same number.

Year	Month	b) The number of non-customers who received a hardship fund grant; c) The number of hardship fund grants issued to NFG non-customers	d) The total dollar amount of NFG hardship fund grants issued to NFG non-customers
2023	January	0	$ -
2023	February	2	$ 600.00
2023	March	6	$ 1,444.19
2023	April	0	$ -
2023	May	1	$ 300.00
2023	June	0	$ -
2023	July	0	$ -
2023	August	0	$ -
2023	September	2	$ 785.38
2023	October	4	$ 1,200.00
2023	November	3	$ 869.91
2023	December	7	$ 1,900.00
2023 Total		25	$ 7,099.48
2024	January	0	$ -
2024	February	3	$ 800.00
2024	March	5	$ 1,505.34
2024	April	2	$ 500.00
2024	May	2	$ 600.00
2024	June	0	$ -
2024	July	0	$ -
2024	August	0	$ -
2024	September	0	$ -
2024	October	6	$ 1,711.00
2024	November	2	$ 500.00
2024	December	5	$ 1,400.00
2024 Total		25	$ 7,016.34
2025	January	6	$ 1,800.00
2025	February	12	$ 3,600.00
2025	March	13	$ 3,576.00
2025	April	7	$ 2,100.00
2025	May	3	$ 797.40
2025	June	0	$ -
2025	July	0	$ -
2025	August	1	$ 300.00
2025	September	2	$ 468.00
2025	October	2	$ 592.95
2025	November	35	$ 10,497.66
2025	December	7	$ 1,844.94
2025 Total		88	$ 25,576.95

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Question

Please refer to NFG St. 14 (Mann) at 14:6-7. Regarding the $30 one-time bill credit proposed to be provided to verified low income customers, please indicate when (month and year) NFG proposes to distribute the one-time credit to verified low income customers.

Response

NFG proposes to post the one-time bill credit as soon as reasonably possible following a Commission order in this proceeding, but no earlier than the start of the FPFTY. The Company's goal would be to issue the credit to active accounts as of the posting date during the November 2026 billing cycle.

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Question

Please refer to NFG St. 14 (Mann) at 14:6-7. Please indicate the following: a) How does NFG define “verified low income customer?” Does the definition differ at all from the Company’s definition of “confirmed low income customer?” If so, please specifically explain the difference. b) How does NFG propose to identify a customer as a “verified low income customer?” Does the process differ at all from the Company’s process for identifying a “confirmed low income customer?” If so, please specifically explain the difference.

Response

The intent of the statement made in NFG St. 14 (Mann) at 14:6-4 was to indicate the one-time bill credit of $30 would be provided to customers at level 1 (150%) and 2 (250%) of the Federal Poverty Level (FPL).

The Company would define a “confirmed low-income customer” as a customer with recorded household income at or below 150 percent of the Federal Poverty Guidelines. In addition, customers who have not contacted the Company to update their income information, but who receive a LIHEAP grant are also designated as “confirmed low-income customers”. The Company uses the terms verified and confirmed low-income customers interchangeably.

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R-2025-3059428

Question

Please refer to NFG St. 14 (Mann) at 14:6-7. For “verified low income” customers who would receive the $30 one-time bill credit proposed to be provided to verified low income customers, please specifically explain the following: a) Will this credit be applied automatically to a customer’s account? To the extent that this response varies based on whether the customer is enrolled in CAP, please specifically explain. b) Would the credit be applied to a customer’s current charges or to arrears? c) For CAP customers, would the credit be applied to the customer’s bill on the ask-to-pay side of the bill, or the CAP credit side of the bill? d) For CAP customers, will the credit count as one of 24 required payments to receive arrearage forgiveness?

Response

a) Yes, the credit will be automatically applied to a customer's account.
b) For customers enrolled in CAP, the credit would apply to current charges unless there are outstanding past-due CAP bills; in that case, the credit would be applied to the oldest CAP invoice first. The credit would not apply to arrearage balance that is eligible for forgiveness. For customers not enrolled in CAP, the credit would apply to the oldest amount due first, then any remaining amount.
c) For CAP customers, the credit would be applied to the ask-to-pay side. It does not impact the calculation of a customer’s bill or their CAP credits.
d) For CAP customers, this one-time bill credit would count as a payment towards arrearage forgiveness. For example, if a customer’s bill totals $30 or less, the credit will cover this bill and the customer will receive arrearage forgiveness. If the bill exceeds $30, the customer will receive arrearage forgiveness once the remaining bill amount is paid.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please specifically describe NFG's process or procedure for screening customers and applicants for low income status. Specifically explain whether NFG screens customers and applicants for low income status: a) At the start of service; b) Upon moving; c) Annually or at any other periodic interval. Please provide a copy of all written policies, procedures, call scripts, training materials, and/ or other documents describing NFG's procedures for screening customers for low income status.

Response

The Company does not have a procedure to screen customers or applicants for low income status as part of starting or moving service. However, the Company will update income information when a customer receives a termination notice or indicates a need for assistance with paying a past due bill, provided the customer is willing to provide such information. See CONFIDENTIAL Attachment Cause-PA-5-16.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please refer to NFG St. 17 at 5:9-16, crediting the 2025 increase in LIURP contractor spending "to the unique circumstances in 2025, when a government shutdown resulted in additional work being redirected from community agencies to the Company, potentially inflating the current year's figures," and indicating that "the organization remains cautious when projecting expenditures for 2026." Please: a) Reconcile this statement with NFG's response to CAUSE-PA II-07, crediting the 2025 increase in LIURP jobs to increased outreach efforts and the Company taking steps to find contractors who can handle additional and more consistent work; b) Refer to NFG's 3rd Revised 2022-2026 Universal Service and Energy Conservation Plan at 41, projecting that NFG will perform 287 LIURP jobs in 2026 and 275 LIURP jobs in 2027. Please describe whether NFG's projected LIURP jobs for 2026 and/or 2027 have changed. If yes, please provide an updated number of LIURP jobs NFG projects to complete in 2026 and 2027, respectively.

Response

In response to section (a), the Company's statement in No. 17 at page 5: 9-16 and in response Cause-PA-II-07 are both accurate as multiple factors contributed to the increase in LIURP jobs seen in 2025.

In response to section (b), the Company's projected LIURP jobs listed in the 3rd revised 2022-2026 Universal Service and Energy Conservation Plan have not changed.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

In Excel format, if available, please provide for each year 2019 to the present (YTD) inclusive each filing with the Bureau of Consumer Services or with the PUC generally providing universal service and collections data. If not available in Excel format, provide in that format which is available.

Response

See Attachment OCA IV-01.xlsx for Universal Service and collection data from 2019 to 2024. The company is unable to provide the data for 2025 as the annual filing due date for Universal Services and collection data is April 1st.

2019

COLLECTION REPORTING

Line	Description	All Residential	Confirmed Low Income
1	Total Number - Payment Arrangements	18,604.00	9,915.00
2	Total Number - Successful Payment Arrangements	3,067.00	1,323.00
3	Annual collection Operating Expenses	$ 522,371.93	$ 191,054.07
4	Total Dollar Amount - Gross Residential Write-Offs	$ 4,166,463.00	$ 3,335,504.23
5	Total Dollar Amount - Net Residential Write-Offs	$ 2,951,308.35	$ 2,141,534.26
6	Total Number Residential Customers - by Month		
	JANUARY	197,817.00	21,846.00
	FEBRUARY	197,969.00	24,709.00
	MARCH	197,964.00	25,559.00
	APRIL	197,401.00	25,576.00
	MAY	196,697.00	25,589.00
	JUNE	195,970.00	25,216.00
	JULY	195,358.00	24,881.00
	AUGUST	195,357.00	24,612.00
	SEPTEMBER	194,977.00	24,492.00
	OCTOBER	196,771.00	25,072.00
	NOVEMBER	197,529.00	25,847.00
	DECEMBER	197,522.00	26,448.00
7A	Total Number Residential Accounts in Arrears on Agreements - by Month		
	JANUARY	3,540.00	n/a
	FEBRUARY	3,844.00	n/a
	MARCH	4,525.00	n/a
	APRIL	5,148.00	n/a
	MAY	6,054.00	n/a
	JUNE	6,039.00	n/a
	JULY	6,019.00	n/a
	AUGUST	5,861.00	n/a
	SEPTEMBER	5,703.00	n/a
	OCTOBER	5,480.00	n/a
	NOVEMBER	5,226.00	n/a
	DECEMBER	4,395.00	n/a
7B	Total Number Residential Accounts in Arrears not on Agreements - by Month		
	JANUARY	17,436.00	5,242.00
	FEBRUARY	14,724.00	5,405.00
	MARCH	13,626.00	5,137.00
	APRIL	13,380.00	4,669.00
	MAY	13,282.00	4,149.00
	JUNE	13,919.00	3,904.00

	JULY	13,521.00	3,719.00
	AUGUST	14,386.00	3,659.00
	SEPTEMBER	14,921.00	3,840.00
	OCTOBER	15,453.00	3,997.00
	NOVEMBER	16,032.00	4,296.00
	DECEMBER	17,231.00	5,018.00
8A	Total Dollar Amount Residential Accounts in Arrears on Agreements - by Month		
	JANUARY	$ 1,182,135.00	$ 591,273.00
	FEBRUARY	$ 1,275,338.00	$ 644,244.00
	MARCH	$ 1,658,117.00	$ 878,043.00
	APRIL	$ 1,834,755.00	$ 998,051.00
	MAY	$ 2,252,599.00	$ 1,303,585.00
	JUNE	$ 2,265,943.00	$ 1,307,525.00
	JULY	$ 2,199,257.00	$ 1,265,681.00
	AUGUST	$ 2,151,633.00	$ 1,222,242.00
	SEPTEMBER	$ 2,149,067.00	$ 1,236,861.00
	OCTOBER	$ 2,170,087.00	$ 1,255,978.00
	NOVEMBER	$ 2,201,520.00	$ 1,316,158.00
	DECEMBER	$ 1,815,994.00	$ 1,044,709.00
8B	Total Dollar Amount Residential Accounts in Arrears not on Agreements - by Month		
	JANUARY	$ 5,095,919.00	$ 2,522,271.00
	FEBRUARY	$ 4,916,426.00	$ 2,751,398.00
	MARCH	$ 4,500,089.00	$ 2,530,350.00
	APRIL	$ 3,609,644.00	$ 1,854,665.00
	MAY	$ 3,280,862.00	$ 1,630,379.00
	JUNE	$ 3,104,238.00	$ 1,463,575.00
	JULY	$ 2,822,731.00	$ 1,327,351.00
	AUGUST	$ 2,693,476.00	$ 1,230,884.00
	SEPTEMBER	$ 2,670,370.00	$ 1,240,521.00
	OCTOBER	$ 2,835,553.00	$ 1,337,266.00
	NOVEMBER	$ 2,931,156.00	$ 1,382,133.00
	DECEMBER	$ 3,689,779.00	$ 1,794,661.00
9	Total Number Residential Payment Troubled Customers - by Month		
	JANUARY	8,559.00	4,214.00
	FEBRUARY	8,596.00	4,207.00
	MARCH	8,623.00	4,210.00
	APRIL	8,653.00	4,195.00
	MAY	8,692.00	4,232.00
	JUNE	8,798.00	4,280.00
	JULY	8,812.00	4,341.00
	AUGUST	8,755.00	4,337.00
	SEPTEMBER	8,972.00	4,500.00
	OCTOBER	9,065.00	4,630.00
	NOVEMBER	9,091.00	4,653.00
	DECEMBER	9,133.00	4,746.00
10	Total Number Terminations - by Month		
	JANUARY	0.00	0.00
	FEBRUARY	0.00	0.00

	MARCH	0.00	0.00
	APRIL	1,671.00	874.00
	MAY	1,220.00	522.00
	JUNE	1,198.00	616.00
	JULY	1,018.00	576.00
	AUGUST	998.00	568.00
	SEPTEMBER	731.00	472.00
	OCTOBER	537.00	355.00
	NOVEMBER	160.00	123.00
	DECEMBER	0.00	0.00
11	Total Number Reconnections - by Month		
	JANUARY	54.00	27.00
	FEBRUARY	12.00	5.00
	MARCH	7.00	6.00
	APRIL	780.00	453.00
	MAY	689.00	307.00
	JUNE	469.00	258.00
	JULY	400.00	234.00
	AUGUST	607.00	352.00
	SEPTEMBER	425.00	273.00
	OCTOBER	702.00	429.00
	NOVEMBER	640.00	481.00
	DECEMBER	141.00	95.00
12	Total Number Low Income Households		60,947.00
	Submit Estimation Methodology in a Separate Document	UPLOAD DOCUMENT	
12B	Annual Residential Revenues	$ 146,182,599.00	$ 19,437,397.00

LIURP REPORTING

Line	Description	VALUE
13	Program Costs/Actual Spending for the Year Just Completed	$ 1,178,597.00
14	Number of Household Members Under Age 18	1.13
15	Number of Household Members Over Age 62	0.43
16	Household Size	2.80
17	Income	$ 22,435.00
18	Source of Income	
	Employment	46.00
	Public Assistance	1.00
	Pension/Retirement	33.00
	Unemployment Compensation	1.00
	Disability	28.00
	Other (includes Missing Data)	14.00
19	Participation Levels by Month - Reporting Year	
Heating Jobs		
	JANUARY	13.00
	FEBRUARY	12.00
	MARCH	10.00
	APRIL	11.00

	MAY		13.00
	JUNE		10.00
	JULY		13.00
	AUGUST		12.00
	SEPTEMBER		5.00
	OCTOBER		12.00
	NOVEMBER		11.00
	DECEMBER		1.00
Water Heating Jobs			
	JANUARY		0.00
	FEBRUARY		0.00
	MARCH		0.00
	APRIL		0.00
	MAY		0.00
	JUNE		0.00
	JULY		0.00
	AUGUST		0.00
	SEPTEMBER		0.00
	OCTOBER		0.00
	NOVEMBER		0.00
	DECEMBER		0.00
Baseload Jobs			
	JANUARY		0.00
	FEBRUARY		0.00
	MARCH		0.00
	APRIL		0.00
	MAY		0.00
	JUNE		0.00
	JULY		0.00
	AUGUST		0.00
	SEPTEMBER		0.00
	OCTOBER		0.00
	NOVEMBER		0.00
	DECEMBER		0.00
20	Project Spending for Current Year	$	2,129,300.00
21	Projected Annual Production Number - Current Year		
	Heating Jobs		247.00
	Water Heating Jobs		0.00
	Baseload Jobs		0.00
22	Average Job Costs		
	Heating Jobs	$	5,740.95
	Water Heating Jobs	$	-
	Baseload Jobs	$	-
22A	Source of Intake		
	Distribution Company		67.00
	Community Base Organization		56.00
	Other		0.00
22B	Participants in Multiple Programs		
	LIURP AND CAP		67.00
	LIURP AND CARES		4.00
	LIURP AND HARDSHIP FUNDS		2.00

LIURP, CAP AND CARES	1.00
LIURP, CAP AND HARDSHIP FUNDS	0.00
LIURP, CARES AND HARDSHIP FUNDS	1.00
LIURP, CAP, CARES, AND HARDSHIP FUNDS	0.00

CAP REPORTING

Line	Description	VALUE	
23	Program Costs - Administration	$	368,648.00
24	Program Costs - CAP Credits	$	1,255,846.00
25	Program Costs - Preprogram Arrearage Forgiveness	$	526,283.00
26A	Program Costs - CAP Accounts in Arrears - not on a Payment Agreement ($)	$	-
26B	Program Costs - CAP Accounts in Arrears - on a Payment Agreement ($)	$	-
27A	Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)		0.00
27B	Program Costs - CAP Accounts in Arrears - on a Payment Agreement (#)		0.00
28	Number of Household Members Under Age 18		0.76
29	Number of Household Members Over Age 62		0.37
30	Household Size		2.16
31	Income	$	14,888.00
32	Source of Income		
	Employment		1,968.00
	Public Assistance		88.00
	Pension/Retirement		2,888.00
	Unemployment Compensation		71.00
	Disability		1,881.00
	Other (includes Missing Data)		263.00
	PARTICIPATION LEVELS BY MONTH		
33	Income at or below 50% of Poverty		
	JANUARY		868.00
	FEBRUARY		882.00
	MARCH		875.00
	APRIL		752.00
	MAY		874.00
	JUNE		852.00
	JULY		513.00
	AUGUST		879.00
	SEPTEMBER		860.00
	OCTOBER		844.00
	NOVEMBER		893.00
	DECEMBER		895.00
34	Income between 51% and 100% of Poverty		
	JANUARY		3,808.00
	FEBRUARY		3,787.00
	MARCH		3,809.00

	APRIL		3,746.00
	MAY		3,734.00
	JUNE		3,679.00
	JULY		3,332.00
	AUGUST		3,649.00
	SEPTEMBER		3,623.00
	OCTOBER		3,665.00
	NOVEMBER		3,668.00
	DECEMBER		3,707.00
35	Income between 101% and 150% of Poverty		
	JANUARY		2,836.00
	FEBRUARY		2,814.00
	MARCH		2,818.00
	APRIL		2,768.00
	MAY		2,764.00
	JUNE		2,744.00
	JULY		2,752.00
	AUGUST		2,742.00
	SEPTEMBER		2,764.00
	OCTOBER		2,771.00
	NOVEMBER		2,771.00
	DECEMBER		2,790.00
36	Participation Levels : Default Exits - Income at or below 50% of Poverty (#)		203.00
37	Participation Levels : Default Exits - Income at or between 51% and 100% of Poverty (#)		899.00
38	Participation Levels : Default Exits - Income at or between 100% and 150% of Poverty (#)		678.00
39	Participation Levels : Exits other than Defaults (#)		1,672.00
40	Energy Assistance Benefits ($)	$	1,391,686.35
41	Energy Assistance Benefits (#)		6,138.00
42	Number of Full CAP Payments by Month		
	JANUARY		4,613.00
	FEBRUARY		5,350.00
	MARCH		5,784.00
	APRIL		5,829.00
	MAY		6,311.00
	JUNE		6,719.00
	JULY		6,898.00
	AUGUST		6,904.00
	SEPTEMBER		6,822.00
	OCTOBER		5,211.00
	NOVEMBER		4,677.00
	DECEMBER		4,325.00
43	Total Annual CAP Billed Amount - (used to calculate Average CAP Bills)	$	5,346,137.00
44	Total Number of CAP Bills Rendered by Month		
	JANUARY		7,730.00
	FEBRUARY		7,726.00
	MARCH		7,793.00
	APRIL		7,549.00

	MAY		7,696.00
	JUNE		7,597.00
	JULY		6,823.00
	AUGUST		7,571.00
	SEPTEMBER		7,577.00
	OCTOBER		7,612.00
	NOVEMBER		7,689.00
	DECEMBER		7,758.00
45	Total Cash Payments by CAP Customers	$	3,848,741.00
46	Number of Full, On-Time Payments		56,707.00
46A	Source of Intake		
	Distribution Company		7,392.00
	Community Base Organization		0.00
	Other		0.00
46B	Participants in Multiple Programs		
	CAP AND LIURP		67.00
	CAP AND CARES		7.00
	CAP AND HARDSHIP FUNDS		84.00
	CAP, LIURP AND CARES		1.00
	CAP, LIURP AND HARDSHIP FUNDS		0.00
	CAP, CARES AND HARDSHIP FUNDS		0.00
	LIURP, CAP, CARES, AND HARDSHIP FUNDS		0.00

CARES REPORTING

Line	Description	VALUE	
47	Program Costs	$	4,542.00
48	Number of Household Members Under Age 18		0.05
49	Number of Household Members Over Age 62		1.06
50	Household Size		1.38
51	Income	$	17,396.00
52	Source of Income		
	Employment		2.00
	Public Assistance		0.00
	Pension/Retirement		32.00
	Unemployment Compensation		0.00
	Disability		0.00
	Other (includes Missing Data)		19.00
53	PARTICIPATION LEVELS BY MONTH		
	JANUARY		7.00
	FEBRUARY		8.00
	MARCH		4.00
	APRIL		0.00
	MAY		1.00
	JUNE		1.00
	JULY		4.00
	AUGUST		2.00
	SEPTEMBER		1.00

	OCTOBER		5.00
	NOVEMBER		17.00
	DECEMBER		3.00
54	Energy Assistance Benefits ($) - LIHEAP Cash Grants (CARES)	$	4,248.00
55	Energy Assistance Benefits (#) - LIHEAP Cash Grants (CARES)		17.00
56	Energy Assistance Benefits ($) - LIHEAP Crisis Grants (CARES)	$	2,596.00
57	Energy Assistance Benefits (#) - LIHEAP Crisis Grants (CARES)		7.00
58	Energy Assistance Benefits ($) - Outreach Efforts - LIHEAP Cash Grants (CARES)	$	4,121,123.00
59	Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (CARES)		15,692.00
60	Energy Assistance Benefits ($) - Outreach Efforts - LIHEAP Crisis Grants (CARES)	$	647,043.00
61	Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (CARES)		2,084.00
62	Direct Dollars Applied to CARES Accounts ($)	$	6,844.00
63	Direct Dollars Applied to CARES Accounts (#)		24.00
64	Cares Benefits (#) - Number of Customers Referred to CARES		53.00
65	Cares Benefits (#) - Number of Customers Accepted into CARES		48.00
65A	Source of Intake		
	Distribution Company		48.00
	Community- Based Organization		0.00
	Other (includes Missing Data)		0.00
65B	Participants in Multiple Programs		
	CARES AND LIURP		4.00
	CARES AND CAP		7.00
	CARES AND HARDSHIP FUND		1.00
	CARES, LIURP AND CAP		1.00
	CARES, LIURP AND HARSHP FUND		1.00
	CARES, CAP AND HARDSHIP FUND		0.00
	CARES, LIURP, CAP, AND HARDSHIP FUND		0.00

HARDSHIP REPORTING

Line	Description	VALUE	
66	Program Costs (Administrative Costs Only)		
	Administrative Costs from Rate Base	$	-
	Administrative Costs from Shareholders	$	-
67	Number of Household Members Under Age 18		0.51
68	Number of Household Members Over Age 62		0.39
69	Household Size		2.01
70	Income	$	20,921.00
71	Source of Income		
	Employment		35.00
	Public Assistance		3.00
	Pension/Retirement		44.00
	Unemployment Compensation		7.00

	Disability		130.00
	Other (includes Missing Data)		22.00
72	Participation Levels by Month (#)		
	NOVEMBER		25.00
	DECEMBER		5.00
	JANUARY		11.00
	FEBRUARY		11.00
	MARCH		11.00
	APRIL		19.00
	MAY		51.00
	JUNE		33.00
	JULY		28.00
	AUGUST		10.00
	SEPTEMBER		26.00
	OCTOBER		11.00
73	Ratepayer/Employee Contributions ($)	$	43,582.00
74	Special Contributions ($)		
	Citizens Energy Corporation	$	-
	Companies Other than Utilities	$	-
	Settlements and Fines	$	-
	Other	$	4,515.00
75	Utility contributions ($) - Initial Grant (Excluding admin $ and Grants dependent on ratepayer match	$	-
76	Utility Contributions ($) - Excluding #66 and #75)	$	67,000.00
77	Utility Contributions ($) - (dependent upon a match from customer contributions)	$	67,000.00
78	Outreach Contacts	UPLOAD FILE	
79	Cash Benefits (#)		241.00
80	Cash Benefits ($)	$	62,060.00
80A	Source of Intake		
	Distribution Company		0.00
	Community- Based Organization		241.00
	Other (includes Missing Data)		0.00
80B	Participants in Multiple Programs		
	Hardship Fund and LIURP		2.00
	Hardship Fund and CAP		84.00
	Hardship Fund and CARES		1.00
	Hardship Fund, LIURP and CAP		0.00
	Hardship Fund, LIURP and CARES		1.00
	Hardship Fund, CARES and CAP		0.00
	Hardship Fund, LIURP, CAP and CARES		0.00

2020

COLLECTION REPORTING

Line	Description	All Residential	Confirmed Low Income
1	Total Number - Payment Arrangements	6,374.00	3,067.00
2	Total Number - Successful Payment Arrangements	1,840.00	839.00
3	Annual collection Operating Expenses	$ 488,958.00	$ 189,875.00
4	Total Dollar Amount - Gross Residential Write-Offs	$ 4,079,349.00	$ 2,653,618.00
5	Total Dollar Amount - Net Residential Write-Offs	$ 3,029,590.00	$ 1,954,171.00
6	Total Number Residential Customers - by Month		
	JANUARY	197,459.00	27,005.00
	FEBRUARY	197,840.00	27,377.00
	MARCH	197,667.00	27,753.00
	APRIL	198,017.00	28,078.00
	MAY	197,868.00	28,016.00
	JUNE	197,772.00	27,818.00
	JULY	197,700.00	27,667.00
	AUGUST	197,593.00	27,466.00
	SEPTEMBER	198,031.00	27,347.00
	OCTOBER	198,325.00	27,259.00
	NOVEMBER	198,499.00	27,408.00
	DECEMBER	198,571.00	27,771.00
7A	Total Number Residential Accounts in Arrears on Agreements - by Month		
	JANUARY	3,622.00	n/a
	FEBRUARY	3,856.00	n/a
	MARCH	3,850.00	n/a
	APRIL	3,373.00	n/a
	MAY	3,005.00	n/a
	JUNE	2,511.00	n/a
	JULY	2,088.00	n/a
	AUGUST	1,934.00	n/a
	SEPTEMBER	1,799.00	n/a
	OCTOBER	1,577.00	n/a
	NOVEMBER	1,547.00	n/a
	DECEMBER	1,634.00	n/a
7B	Total Number Residential Accounts in Arrears not on Agreements - by Month		
	JANUARY	17,812.00	5,925.00
	FEBRUARY	15,425.00	5,750.00
	MARCH	15,262.00	5,918.00
	APRIL	15,782.00	5,856.00
	MAY	16,132.00	7,607.00
	JUNE	17,426.00	5,874.00

	JULY	18,889.00	6,353.00
	AUGUST	19,717.00	6,709.00
	SEPTEMBER	20,032.00	6,703.00
	OCTOBER	20,582.00	6,923.00
	NOVEMBER	20,443.00	6,863.00
	DECEMBER	20,071.00	6,820.00
8A	Total Dollar Amount Residential Accounts in Arrears on Agreements - by Month		
	JANUARY	$ 1,362,342.00	$ 742,758.00
	FEBRUARY	$ 1,338,317.00	$ 648,934.00
	MARCH	$ 1,333,723.00	$ 620,812.00
	APRIL	$ 1,229,863.00	$ 602,421.00
	MAY	$ 1,093,436.00	$ 533,138.00
	JUNE	$ 959,159.00	$ 479,255.00
	JULY	$ 793,898.00	$ 396,166.00
	AUGUST	$ 774,599.00	$ 379,852.00
	SEPTEMBER	$ 736,140.00	$ 353,943.00
	OCTOBER	$ 655,116.00	$ 306,870.00
	NOVEMBER	$ 646,505.00	$ 294,374.00
	DECEMBER	$ 707,575.00	$ 300,472.00
8B	Total Dollar Amount Residential Accounts in Arrears not on Agreements - by Month		
	JANUARY	$ 4,774,128.00	$ 2,494,209.00
	FEBRUARY	$ 4,555,383.00	$ 2,621,792.00
	MARCH	$ 4,511,872.00	$ 2,563,517.00
	APRIL	$ 5,005,237.00	$ 2,628,710.00
	MAY	$ 5,313,336.00	$ 2,646,629.00
	JUNE	$ 6,070,667.00	$ 2,998,968.00
	JULY	$ 6,794,429.00	$ 3,306,865.00
	AUGUST	$ 7,169,029.00	$ 3,556,498.00
	SEPTEMBER	$ 7,385,131.00	$ 3,645,613.00
	OCTOBER	$ 7,973,692.00	$ 4,021,389.00
	NOVEMBER	$ 8,342,390.00	$ 4,273,206.00
	DECEMBER	$ 8,654,848.00	$ 4,478,381.00
9	Total Number Residential Payment Troubled Customers - by Month		
	JANUARY	9,109.00	4,876.00
	FEBRUARY	9,101.00	4,899.00
	MARCH	9,184.00	4,946.00
	APRIL	9,366.00	4,989.00
	MAY	9,449.00	5,019.00
	JUNE	9,413.00	5,005.00
	JULY	9,275.00	4,876.00
	AUGUST	8,964.00	4,696.00
	SEPTEMBER	8,387.00	4,389.00
	OCTOBER	7,817.00	4,049.00
	NOVEMBER	7,228.00	3,746.00
	DECEMBER	6,443.00	3,249.00
10	Total Number Terminations - by Month		
	JANUARY	0.00	0.00
	FEBRUARY	0.00	0.00

	MARCH	0.00	0.00
	APRIL	0.00	0.00
	MAY	0.00	0.00
	JUNE	0.00	0.00
	JULY	0.00	0.00
	AUGUST	0.00	0.00
	SEPTEMBER	0.00	0.00
	OCTOBER	0.00	0.00
	NOVEMBER	0.00	0.00
	DECEMBER	0.00	0.00
11	Total Number Reconnections - by Month		
	JANUARY	36.00	21.00
	FEBRUARY	25.00	18.00
	MARCH	16.00	10.00
	APRIL	16.00	10.00
	MAY	11.00	5.00
	JUNE	6.00	2.00
	JULY	2.00	1.00
	AUGUST	5.00	0.00
	SEPTEMBER	5.00	2.00
	OCTOBER	12.00	5.00
	NOVEMBER	19.00	9.00
	DECEMBER	14.00	6.00
12	Total Number Low Income Households		59,860.00
	Submit Estimation Methodology in a Separate Document	UPLOAD DOCUMENT	
12B	Annual Residential Revenues	$ 130,691,047.00	$ 17,284,671.00

LIURP REPORTING

Line	Description	VALUE
13	Program Costs/Actual Spending for the Year Just Completed	$ 820,235.00
14	Number of Household Members Under Age 18	1.35
15	Number of Household Members Over Age 62	0.39
16	Household Size	3.26
17	Income	$ 25,445.00
18	Source of Income	
	Employment	37.00
	Public Assistance	1.00
	Pension/Retirement	17.00
	Unemployment Compensation	0.00
	Disability	16.00
	Other (includes Missing Data)	6.00
19	Participation Levels by Month - Reporting Year	
Heating Jobs		
	JANUARY	8.00
	FEBRUARY	8.00
	MARCH	14.00
	APRIL	3.00

	MAY		0.00
	JUNE		0.00
	JULY		10.00
	AUGUST		5.00
	SEPTEMBER		9.00
	OCTOBER		9.00
	NOVEMBER		9.00
	DECEMBER		2.00
Water Heating Jobs			
	JANUARY		0.00
	FEBRUARY		0.00
	MARCH		0.00
	APRIL		0.00
	MAY		0.00
	JUNE		0.00
	JULY		0.00
	AUGUST		0.00
	SEPTEMBER		0.00
	OCTOBER		0.00
	NOVEMBER		0.00
	DECEMBER		0.00
Baseload Jobs			
	JANUARY		0.00
	FEBRUARY		0.00
	MARCH		0.00
	APRIL		0.00
	MAY		0.00
	JUNE		0.00
	JULY		0.00
	AUGUST		0.00
	SEPTEMBER		0.00
	OCTOBER		0.00
	NOVEMBER		0.00
	DECEMBER		0.00
20	Project Spending for Current Year	$	2,609,065.00
21	Projected Annual Production Number - Current Year		
	Heating Jobs		291.00
	Water Heating Jobs		0.00
	Baseload Jobs		0.00
22	Average Job Costs		
	Heating Jobs	$	5,624.00
	Water Heating Jobs	$	-
	Baseload Jobs	$	-
22A	Source of Intake		
	Distribution Company		34.00
	Community Base Organization		43.00
	Other		0.00
22B	Participants in Multiple Programs		
	LIURP AND CAP		34.00
	LIURP AND CARES		0.00
	LIURP AND HARDSHIP FUNDS		0.00

LIURP, CAP AND CARES	0.00
LIURP, CAP AND HARDSHIP FUNDS	0.00
LIURP, CARES AND HARDSHIP FUNDS	0.00
LIURP, CAP, CARES, AND HARDSHIP FUNDS	0.00

CAP REPORTING

Line	Description	VALUE	
23	Program Costs - Administration	$	270,288.00
24	Program Costs - CAP Credits	$	1,252,107.00
25	Program Costs - Preprogram Arrearage Forgiveness	$	466,566.00
26A	Program Costs - CAP Accounts in Arrears - not on a Payment Agreement ($)	$	-
26B	Program Costs - CAP Accounts in Arrears - on a Payment Agreement ($)	$	-
27A	Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)		0.00
27B	Program Costs - CAP Accounts in Arrears - on a Payment Agreement (#)		0.00
28	Number of Household Members Under Age 18		0.76
29	Number of Household Members Over Age 62		0.40
30	Household Size		2.15
31	Income	$	14,900.00
32	Source of Income		
	Employment		2,054.00
	Public Assistance		80.00
	Pension/Retirement		2,315.00
	Unemployment Compensation		195.00
	Disability		2,863.00
	Other (includes Missing Data)		286.00
	PARTICIPATION LEVELS BY MONTH		
33	Income at or below 50% of Poverty		
	JANUARY		891.00
	FEBRUARY		887.00
	MARCH		886.00
	APRIL		1,039.00
	MAY		961.00
	JUNE		966.00
	JULY		991.00
	AUGUST		981.00
	SEPTEMBER		986.00
	OCTOBER		974.00
	NOVEMBER		965.00
	DECEMBER		973.00
34	Income between 51% and 100% of Poverty		
	JANUARY		3,728.00
	FEBRUARY		3,709.00
	MARCH		3,693.00

	APRIL		3,998.00
	MAY		3,801.00
	JUNE		3,846.00
	JULY		3,907.00
	AUGUST		3,876.00
	SEPTEMBER		3,881.00
	OCTOBER		3,921.00
	NOVEMBER		3,919.00
	DECEMBER		3,920.00
35	Income between 101% and 150% of Poverty		
	JANUARY		2,788.00
	FEBRUARY		2,732.00
	MARCH		2,728.00
	APRIL		2,959.00
	MAY		2,811.00
	JUNE		2,878.00
	JULY		2,896.00
	AUGUST		2,875.00
	SEPTEMBER		2,863.00
	OCTOBER		2,894.00
	NOVEMBER		2,900.00
	DECEMBER		2,900.00
36	Participation Levels : Default Exits - Income at or below 50% of Poverty (#)		21.00
37	Participation Levels : Default Exits - Income at or between 51% and 100% of Poverty (#)		86.00
38	Participation Levels : Default Exits - Income at or between 100% and 150% of Poverty (#)		66.00
39	Participation Levels : Exits other than Defaults (#)		1,298.00
40	Energy Assistance Benefits ($)	$	1,414,117.00
41	Energy Assistance Benefits (#)		6,603.00
42	Number of Full CAP Payments by Month		
	JANUARY		4,857.00
	FEBRUARY		5,422.00
	MARCH		5,672.00
	APRIL		6,318.00
	MAY		6,883.00
	JUNE		6,746.00
	JULY		6,431.00
	AUGUST		6,337.00
	SEPTEMBER		6,544.00
	OCTOBER		6,056.00
	NOVEMBER		4,757.00
	DECEMBER		4,369.00
43	Total Annual CAP Billed Amount - (used to calculate Average CAP Bills)	$	4,721,358.00
44	Total Number of CAP Bills Rendered by Month		
	JANUARY		7,790.00
	FEBRUARY		7,767.00
	MARCH		7,748.00
	APRIL		7,996.00

	MAY		8,169.00
	JUNE		8,312.00
	JULY		8,411.00
	AUGUST		8,255.00
	SEPTEMBER		8,259.00
	OCTOBER		8,307.00
	NOVEMBER		8,298.00
	DECEMBER		8,302.00
45	Total Cash Payments by CAP Customers	$	3,080,046.00
46	Number of Full, On-Time Payments		57,648.00
46A	Source of Intake		
	Distribution Company		7,793.00
	Community Base Organization		0.00
	Other		0.00
46B	Participants in Multiple Programs		
	CAP AND LIURP		34.00
	CAP AND CARES		10.00
	CAP AND HARDSHIP FUNDS		20.00
	CAP, LIURP AND CARES		0.00
	CAP, LIURP AND HARDSHIP FUNDS		0.00
	CAP, CARES AND HARDSHIP FUNDS		0.00
	LIURP, CAP, CARES, AND HARDSHIP FUNDS		0.00

CARES REPORTING

Line	Description	VALUE	
47	Program Costs	$	4,908.00
48	Number of Household Members Under Age 18		0.04
49	Number of Household Members Over Age 62		0.17
50	Household Size		1.25
51	Income	$	16,891.00
52	Source of Income		
	Employment		6.00
	Public Assistance		0.00
	Pension/Retirement		5.00
	Unemployment Compensation		0.00
	Disability		2.00
	Other (includes Missing Data)		16.00
53	PARTICIPATION LEVELS BY MONTH		
	JANUARY		7.00
	FEBRUARY		9.00
	MARCH		3.00
	APRIL		1.00
	MAY		0.00
	JUNE		1.00
	JULY		1.00
	AUGUST		1.00
	SEPTEMBER		0.00

	OCTOBER		2.00
	NOVEMBER		2.00
	DECEMBER		2.00
54	Energy Assistance Benefits ($) - LIHEAP Cash Grants (CARES)	$	1,913.00
55	Energy Assistance Benefits (#) - LIHEAP Cash Grants (CARES)		7.00
56	Energy Assistance Benefits ($) - LIHEAP Crisis Grants (CARES)	$	2,362.00
57	Energy Assistance Benefits (#) - LIHEAP Crisis Grants (CARES)		4.00
58	Energy Assistance Benefits ($) - Outreach Efforts - LIHEAP Cash Grants (CARES)	$	3,843,539.00
59	Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (CARES)		14583.00
60	Energy Assistance Benefits ($) - Outreach Efforts - LIHEAP Crisis Grants (CARES)	$	851,260.00
61	Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (CARES)		2764.00
62	Direct Dollars Applied to CARES Accounts ($)	$	4,725.00
63	Direct Dollars Applied to CARES Accounts (#)		11.00
64	Cares Benefits (#) - Number of Customers Referred to CARES		29.00
65	Cares Benefits (#) - Number of Customers Accepted into CARES		29.00
65A	Source of Intake		
	Distribution Company		29.00
	Community- Based Organization		0.00
	Other (includes Missing Data)		0.00
65B	Participants in Multiple Programs		
	CARES AND LIURP		0.00
	CARES AND CAP		10.00
	CARES AND HARDSHIP FUND		0.00
	CARES, LIURP AND CAP		0.00
	CARES, LIURP AND HARSHP FUND		0.00
	CARES, CAP AND HARDSHIP FUND		0.00
	CARES, LIURP, CAP, AND HARDSHIP FUND		0.00

HARDSHIP REPORTING

Line	Description	VALUE	
66	Program Costs (Administrative Costs Only		
	Administrative Costs from Rate Base	$	-
	Administrative Costs from Shareholders	$	-
67	Number of Household Members Under Age 18		0.38
68	Number of Household Members Over Age 62		0.48
69	Household Size		1.93
70	Income	$	18,389.00
71	Source of Income		
	Employment		6.00
	Public Assistance		0.00
	Pension/Retirement		13.00
	Unemployment Compensation		5.00

	Disability		26.00
	Other (includes Missing Data)		21.00
72	Participation Levels by Month (#)		
	NOVEMBER		17.00
	DECEMBER		3.00
	JANUARY		9.00
	FEBRUARY		10.00
	MARCH		6.00
	APRIL		6.00
	MAY		7.00
	JUNE		3.00
	JULY		1.00
	AUGUST		2.00
	SEPTEMBER		3.00
	OCTOBER		4.00
73	Ratepayer/Employee Contributions ($)	$	43,492.00
74	Special Contributions ($)		
	Citizens Energy Corporation	$	-
	Companies Other than Utilities	$	-
	Settlements and Fines	$	-
	Other	$	600.00
75	Utility contributions ($) - Initial Grant (Excluding admin $ and Grants dependent on ratepayer match	$	-
76	Utility Contributions ($) - Excluding #66 and #75)	$	67,000.00
77	Utility Contributions ($) - (dependent upon a match from customer contributions)	$	67,000.00
78	Outreach Contacts	UPLOAD FILE	
79	Cash Benefits (#)		71.00
80	Cash Benefits ($)	$	15,001.00
80A	Source of Intake		
	Distribution Company		0.00
	Community- Based Organization		71.00
	Other (includes Missing Data)		0.00
80B	Participants in Multiple Programs		
	Hardship Fund and LIURP		0.00
	Hardship Fund and CAP		20.00
	Hardship Fund and CARES		0.00
	Hardship Fund, LIURP and CAP		0.00
	Hardship Fund, LIURP and CARES		0.00
	Hardship Fund, CARES and CAP		0.00
	Hardship Fund, LIURP, CAP and CARES		0.00

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COLLECTION REPORTING

Line	Description	All Residential	Confirmed Low Income
1	Total Number - Payment Arrangements	13248	7412
2	Total Number - Successful Payment Arrangements	1225	518
3	Annual collection Operating Expenses	$ 715,813.00	$ 202,385.00
4	Total Dollar Amount - Gross Residential Write-Offs	$ 2,047,895.00	$ 1,264,922.00
5	Total Dollar Amount - Net Residential Write-Offs	$ 863,196.00	$ 397,607.00
6	Total Number Residential Customers - by Month		
	JANUARY	198,813.00	22,607.00
	FEBRUARY	199,117.00	22,832.00
	MARCH	198,873.00	23,099.00
	APRIL	198,922.00	23,096.00
	MAY	198,209.00	22,886.00
	JUNE	197,258.00	22,516.00
	JULY	196,957.00	22,214.00
	AUGUST	196,612.00	22,142.00
	SEPTEMBER	196,850.00	22,042.00
	OCTOBER	197,842.00	21,971.00
	NOVEMBER	198,257.00	22,289.00
	DECEMBER	198,369.00	22,504.00
7A	Total Number Residential Accounts in Arrears on Agreements - by Month		
	JANUARY	1,650.00	531.00
	FEBRUARY	2,166.00	598.00
	MARCH	2,801.00	773.00
	APRIL	3,517.00	1,086.00
	MAY	4,549.00	1,762.00
	JUNE	4,819.00	2,050.00
	JULY	5,102.00	2,323.00
	AUGUST	5,037.00	2,392.00
	SEPTEMBER	4,838.00	2,305.00
	OCTOBER	4,448.00	2,114.00
	NOVEMBER	4,238.00	1,991.00
	DECEMBER	3,695.00	1,656.00
7B	Total Number Residential Accounts in Arrears not on Agreements - by Month		
	JANUARY	19,163.00	5,551.00
	FEBRUARY	16,720.00	5,321.00
	MARCH	13,640.00	4,685.00
	APRIL	12,752.00	4,308.00
	MAY	11,636.00	3,309.00
	JUNE	11,636.00	2,866.00

	JULY	12,049.00	2,701.00
	AUGUST	11,524.00	2,138.00
	SEPTEMBER	12,664.00	2,402.00
	OCTOBER	6,215.00	1,766.00
	NOVEMBER	6,831.00	1,962.00
	DECEMBER	9,834.00	2,671.00
8A	Total Dollar Amount Residential Accounts in Arrears on Agreements - by Month		
	JANUARY	$ 733,223.64	$ 247,851.02
	FEBRUARY	$ 1,061,031.07	$ 299,124.49
	MARCH	$ 1,475,229.16	$ 425,605.28
	APRIL	$ 2,195,970.09	$ 778,056.86
	MAY	$ 3,065,464.73	$ 1,403,945.93
	JUNE	$ 3,283,617.07	$ 1,661,711.36
	JULY	$ 3,451,665.88	$ 1,831,583.26
	AUGUST	$ 3,390,046.20	$ 1,837,952.80
	SEPTEMBER	$ 3,251,868.53	$ 1,747,649.24
	OCTOBER	$ 2,973,772.15	$ 1,588,764.43
	NOVEMBER	$ 2,852,915.23	$ 1,525,579.82
	DECEMBER	$ 2,414,442.68	$ 1,224,736.79
8B	Total Dollar Amount Residential Accounts in Arrears not on Agreements - by Month		
	JANUARY	$ 8,886,775.79	$ 4,084,629.27
	FEBRUARY	$ 8,484,441.94	$ 4,012,764.82
	MARCH	$ 6,950,461.83	$ 3,466,347.28
	APRIL	$ 6,034,990.36	$ 2,837,885.27
	MAY	$ 3,837,751.73	$ 1,726,869.78
	JUNE	$ 2,910,711.82	$ 1,181,630.18
	JULY	$ 2,748,347.98	$ 1,056,539.66
	AUGUST	$ 2,358,651.44	$ 892,778.74
	SEPTEMBER	$ 2,470,011.20	$ 987,134.68
	OCTOBER	$ 1,808,439.36	$ 866,332.26
	NOVEMBER	$ 1,923,246.60	$ 937,379.23
	DECEMBER	$ 2,781,744.63	$ 1,399,755.34
9	Total Number Residential Payment Troubled Customers - by Month		
	JANUARY	5,220.00	2,502.00
	FEBRUARY	4,655.00	2,117.00
	MARCH	4,365.00	1,929.00
	APRIL	3,934.00	1,768.00
	MAY	3,577.00	1,597.00
	JUNE	3,426.00	1,487.00
	JULY	3,470.00	1,490.00
	AUGUST	3,633.00	1,609.00
	SEPTEMBER	3,907.00	1,765.00
	OCTOBER	4,314.00	1,985.00
	NOVEMBER	4,384.00	2,042.00
	DECEMBER	4,804.00	2,321.00
10	Total Number Terminations - by Month		
	JANUARY	0.00	0.00
	FEBRUARY	0.00	0.00

	MARCH	0.00	0.00
	APRIL	162.00	98.00
	MAY	2,050.00	984.00
	JUNE	1,613.00	789.00
	JULY	1,293.00	692.00
	AUGUST	915.00	456.00
	SEPTEMBER	698.00	384.00
	OCTOBER	262.00	163.00
	NOVEMBER	182.00	102.00
	DECEMBER	0.00	0.00
11	Total Number Reconnections - by Month	[redacted]	
	JANUARY	4.00	4.00
	FEBRUARY	3.00	0.00
	MARCH	1.00	0.00
	APRIL	61.00	38.00
	MAY	947.00	523.00
	JUNE	791.00	438.00
	JULY	883.00	490.00
	AUGUST	680.00	362.00
	SEPTEMBER	615.00	355.00
	OCTOBER	554.00	307.00
	NOVEMBER	460.00	254.00
	DECEMBER	96.00	63.00
12	Total Number Low Income Households	[redacted]	58,794.00
	Submit Estimation Methodology in a Separate Document	UPLOAD DOCUMENT	
12B	Annual Residential Revenues	$ 145,155,802.00	$ 17,240,043.00

LIURP REPORTING

Line	Description	VALUE
13	Program Costs/Actual Spending for the Year Just Completed	$ 972,968.00
14	Number of Household Memers Under Age 18	1.13
15	Number of Household Memers Over Age 62	0.31
16	Household Size	2.92
17	Income	$ 22,303.00
18	Source of Income	[redacted]
	Employment	45.00
	Public Assistance	0.00
	Pension/Retirement	17.00
	Unemployment Compensation	4.00
	Disability	18.00
	Other (includes Missing Data)	9.00
19	Participation Levels by Month - Reporting Year	[redacted]
Heating Jobs		
	JANUARY	6.00
	FEBRUARY	6.00
	MARCH	7.00
	APRIL	7.00

	MAY		9.00
	JUNE		5.00
	JULY		15.00
	AUGUST		6.00
	SEPTEMBER		11.00
	OCTOBER		10.00
	NOVEMBER		6.00
	DECEMBER		5.00
Water Heating Jobs			
	JANUARY		0.00
	FEBRUARY		0.00
	MARCH		0.00
	APRIL		0.00
	MAY		0.00
	JUNE		0.00
	JULY		0.00
	AUGUST		0.00
	SEPTEMBER		0.00
	OCTOBER		0.00
	NOVEMBER		0.00
	DECEMBER		0.00
Baseload Jobs			
	JANUARY		0.00
	FEBRUARY		0.00
	MARCH		0.00
	APRIL		0.00
	MAY		0.00
	JUNE		0.00
	JULY		0.00
	AUGUST		0.00
	SEPTEMBER		0.00
	OCTOBER		0.00
	NOVEMBER		0.00
	DECEMBER		0.00
20	Project Spending for Current Year	$	2,936,096.00
21	Projected Annual Production Number - Current Year		
	Heating Jobs		344.00
	Water Heating Jobs		0.00
	Baseload Jobx		0.00
22	Average Job Costs		
	Heating Jobs	$	5,831.54
	Water Heating Jobs	$	-
	Baseload Jobx	$	-
22A	Source of Intake		
	Distribution Company		48.00
	Community Base Organization		45.00
	Other		0.00
22B	Participants in Multiple Programs		
	LIURP AND CAP		48.00
	LIURP AND CARES		0.00
	LIURP AND HARDSHIP FUNDS		0.00

LIURP, CAP AND CARES	0.00
LIURP, CAP AND HARDSHIP FUNDS	1.00
LIURP, CARES AND HARDSHIP FUNDS	0.00
LIURP, CAP, CARES, AND HARDSHIP FUNDS	0.00

CAP REPORTING

Line	Description	VALUE	
23	Program Costs - Administration	$	218,475.00
24	Program Costs - CAP Credits	$	1,415,748.00
25	Program Costs - Preprogram Arrearage Forgiveness	$	508,385.00
26A	Program Costs - CAP Accounts in Arrears - not on a Payment Agreement ($)	$	-
26B	Program Costs - CAP Accounts in Arrears - on a Payment Agreement ($)	$	-
27A	Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)		0.00
27B	Program Costs - CAP Accounts in Arrears - on a Payment Agreement (#)		0.00
28	Number of Household Members Under Age 18		0.71
29	Number of Household Members Over Age 62		0.47
30	Household Size		2.09
31	Income	$	14,856.00
32	Source of Income		
	Employment		1,779.00
	Public Assistance		68.00
	Pension/Retirement		2,221.00
	Unemployment Compensation		174.00
	Disability		2,742.00
	Other (includes Missing Data)		217.00
	PARTICIPATION LEVELS BY MONTH		
33	Income at or below 50% of Poverty		
	JANUARY		941.00
	FEBRUARY		986.00
	MARCH		986.00
	APRIL		1,026.00
	MAY		1,001.00
	JUNE		999.00
	JULY		1,007.00
	AUGUST		939.00
	SEPTEMBER		879.00
	OCTOBER		674.00
	NOVEMBER		853.00
	DECEMBER		868.00
34	Income between 51% and 100% of Poverty		
	JANUARY		3,862.00
	FEBRUARY		3,912.00
	MARCH		3,903.00

	APRIL		3,927.00
	MAY		3,876.00
	JUNE		3,876.00
	JULY		3,866.00
	AUGUST		3,726.00
	SEPTEMBER		3,652.00
	OCTOBER		3,493.00
	NOVEMBER		3,605.00
	DECEMBER		3,625.00
35	Income between 101% and 150% of Poverty		
	JANUARY		2,904.00
	FEBRUARY		2,897.00
	MARCH		2,898.00
	APRIL		2,927.00
	MAY		2,919.00
	JUNE		2,898.00
	JULY		2,878.00
	AUGUST		2,822.00
	SEPTEMBER		2,754.00
	OCTOBER		2,740.00
	NOVEMBER		2,706.00
	DECEMBER		2,708.00
36	Participation Levels : Default Exits - Income at or below 50% of Poverty (#)		92.00
37	Participation Levels : Default Exits - Income at or between 51% and 100% of Poverty (#)		372.00
38	Participation Levels : Default Exits - Income at or between 100% and 150% of Poverty (#)		279.00
39	Participation Levels : Exits other than Defaults (#)		1,465.00
40	Energy Assistance Benefits ($)	$	2,319,048.00
41	Energy Assistance Benefits (#)		9,373.00
42	Number of Full CAP Payments by Month		
	JANUARY		4,839.00
	FEBRUARY		5,508.00
	MARCH		6,195.00
	APRIL		6,638.00
	MAY		6,870.00
	JUNE		7,140.00
	JULY		7,102.00
	AUGUST		7,370.00
	SEPTEMBER		5,079.00
	OCTOBER		4,558.00
	NOVEMBER		3,793.00
	DECEMBER		3,793.00
43	Total Annual CAP Billed Amount - (used to calculate Average CAP Bills)	$	5,035,895.00
44	Total Number of CAP Bills Rendered by Month		
	JANUARY		8,206.00
	FEBRUARY		8,299.00
	MARCH		8,264.00
	APRIL		8,343.00

	MAY		8,267.00
	JUNE		8,265.00
	JULY		8,246.00
	AUGUST		8,002.00
	SEPTEMBER		7,767.00
	OCTOBER		7,342.00
	NOVEMBER		7,653.00
	DECEMBER		7,702.00
45	Total Cash Payments by CAP Customers	$	3,050,673.00
46	Number of Full, On-Time Payments		64,617.00
46A	Source of Intake		
	Distribution Company		7,201.00
	Community Base Organization		0.00
	Other		0.00
46B	Participants in Multiple Programs		
	CAP AND LIURP		48.00
	CAP AND CARES		7.00
	CAP AND HARDSHIP FUNDS		8.00
	CAP, LIURP AND CARES		0.00
	CAP, LIURP AND HARDSHIP FUNDS		1.00
	CAP, CARES AND HARDSHIP FUNDS		0.00
	LIURP, CAP, CARES, AND HARDSHIP FUNDS		0.00

CARES REPORTING

Line	Description	VALUE	
47	Program Costs	$	4,240.35
48	Number of Household Members Under Age 18		0.39
49	Number of Household Members Over Age 62		0.61
50	Household Size		1.82
51	Income	$	21,276.00
52	Source of Income		
	Employment		5.00
	Public Assistance		1.00
	Pension/Retirement		21.00
	Unemployment Compensation		1.00
	Disability		0.00
	Other (includes Missing Data)		7.00
53	PARTICIPATION LEVELS BY MONTH		
	JANUARY		4.00
	FEBRUARY		6.00
	MARCH		3.00
	APRIL		0.00
	MAY		5.00
	JUNE		1.00
	JULY		2.00
	AUGUST		4.00
	SEPTEMBER		1.00

	OCTOBER		1.00
	NOVEMBER		6.00
	DECEMBER		2.00
54	Energy Assistance Benefits ($) - LIHEAP Cash Grants (CARES)	$	3,807.00
55	Energy Assistance Benefits (#) - LIHEAP Cash Grants (CARES)		15.00
56	Energy Assistance Benefits ($) - LIHEAP Crisis Grants (CARES)	$	773.46
57	Energy Assistance Benefits (#) - LIHEAP Crisis Grants (CARES)		3.00
58	Energy Assistance Benefits ($) - Outreach Efforts - LIHEAP Cash Grants (CARES)	$	5,709,973.28
59	Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (CARES)		13699.00
60	Energy Assistance Benefits ($) - Outreach Efforts - LIHEAP Crisis Grants (CARES)	$	1,648,430.93
61	Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (CARES)		3404.00
62	Direct Dollars Applied to CARES Accounts ($)	$	5,566.02
63	Direct Dollars Applied to CARES Accounts (#)		10.00
64	Cares Benefits (#) - Number of Customers Referred to CARES		35.00
65	Cares Benefits (#) - Number of Customers Accepted into CARES		35.00
65A	Source of Intake		
	Distribution Company		35.00
	Community- Based Organization		0.00
	Other (includes Missing Data)		0.00
65B	Participants in Multiple Programs		
	CARES AND LIURP		0.00
	CARES AND CAP		7.00
	CARES AND HARDSHIP FUND		0.00
	CARES, LIURP AND CAP		0.00
	CARES, LIURP AND HARSHP FUND		0.00
	CARES, CAP AND HARDSHIP FUND		0.00
	CARES, LIURP, CAP, AND HARDSHIP FUND		0.00

HARDSHIP REPORTING

Line	Description	VALUE	
66	Program Costs (Administrative Costs Only		
	Administrative Costs from Rate Base	$	-
	Administrative Costs from Shareholders	$	-
67	Number of Household Members Under Age 18		0.46
68	Number of Household Members Over Age 62		0.34
69	Houshold Size		1.98
70	Income	$	17,838.38
71	Source of Income		
	Employment		5.00
	Public Assistance		0.00
	Pension/Retirement		14.00
	Unemployment Compensation		7.00

	Disability		25.00
	Other (includes Missing Data)		8.00
72	Participation Levels by Month (#)		
	NOVEMBER		7.00
	DECEMBER		1.00
	JANUARY		9.00
	FEBRUARY		2.00
	MARCH		4.00
	APRIL		4.00
	MAY		11.00
	JUNE		8.00
	JULY		6.00
	AUGUST		3.00
	SEPTEMBER		4.00
	OCTOBER		0.00
73	Ratepayer/Employee Contributions ($)	$	43,417.80
74	Special Contribusions ($)		
	Citizens Energy Corportion	$	-
	Companies Other than Utilities	$	-
	Settlements and Fines	$	-
	Other	$	270.00
75	Utility contributions ($) - Initial Grant (Excoluding admin $ and Grants dependent on ratepayer match	$	-
76	Utility Contributions ($) - Excluding #66 and #75)	$	67,000.00
77	Utility Contrigubtions ($) - (dependent upon a match from customer contributions)	$	67,000.00
78	Outreach Contacts	UPLOAD FILE	
79	Cash Benefits (#)		59.00
80	Cash Benefits ($)	$	16,401.59
80A	Source of Intake		
	Distribution Company		0.00
	Community- Based Organization		59.00
	Other (includes Missing Data)		0.00
80B	Participants in Multiple Programs		
	Hardship Fund and LIURP		0.00
	Hardship Fund and CAP		8.00
	Hardship Fund and CARES		0.00
	Hardship Fund, LIURP and CAP		1.00
	Hardship Fund, LIURP and CARES		0.00
	Hardship Fund, CARES and CAP		0.00
	Harship Fund, LIURP, CAP and CARES		0.00

2022

COLLECTION REPORTING

Line	Description	All Residential	Confirmed Low Income
1	Total Number - Payment Arrangements	13,298.00	6,874.00
2	Total Number - Successful Payment Arrangements	1,165.00	394.00
3	Annual collection Operating Expenses	$ 856,517.00	$ 205,285.00
4	Total Dollar Amount - Gross Residential Write-Offs	$ 3,515,466.00	$ 2,239,447.00
5	Total Dollar Amount - Net Residential Write-Offs	$ 2,554,039.00	$ 1,560,834.00
6	Total Number Residential Customers - by Month		
	JANUARY	198,344.00	22,933.00
	FEBRUARY	198,675.00	23,468.00
	MARCH	197,770.00	23,929.00
	APRIL	197,515.00	24,005.00
	MAY	196,626.00	24,074.00
	JUNE	195,786.00	23,827.00
	JULY	195,380.00	23,442.00
	AUGUST	194,870.00	23,058.00
	SEPTEMBER	195,266.00	22,862.00
	OCTOBER	196,076.00	22,950.00
	NOVEMBER	196,986.00	23,270.00
	DECEMBER	197,602.00	23,680.00
7A	Total Number Residential Accounts in Arrears on Agreements - by Month		
	JANUARY	2,717.00	1,094.00
	FEBRUARY	2,905.00	961.00
	MARCH	3,527.00	1,106.00
	APRIL	4,162.00	1,421.00
	MAY	4,667.00	1,694.00
	JUNE	5,031.00	1,944.00
	JULY	5,194.00	2,073.00
	AUGUST	5,044.00	1,999.00
	SEPTEMBER	4,924.00	1,998.00
	OCTOBER	4,495.00	1,767.00
	NOVEMBER	4,737.00	2,015.00
	DECEMBER	4,138.00	1,682.00
7B	Total Number Residential Accounts in Arrears not on Agreements - by Month		
	JANUARY	14,126.00	3,744.00
	FEBRUARY	12,684.00	3,540.00
	MARCH	11,417.00	3,370.00
	APRIL	11,884.00	3,461.00
	MAY	11,956.00	3,478.00
	JUNE	12,243.00	3,333.00

	JULY	12,166.00	3,125.00
	AUGUST	11,185.00	2,112.00
	SEPTEMBER	12,392.00	2,441.00
	OCTOBER	13,013.00	2,792.00
	NOVEMBER	14,077.00	3,557.00
	DECEMBER	16,359.00	4,447.00
8A	Total Dollar Amount Residential Accounts in Arrears on Agreements - by Month		
	JANUARY	$ 1,587,521.00	$ 764,243.00
	FEBRUARY	$ 1,452,458.00	$ 589,255.00
	MARCH	$ 1,875,516.00	$ 754,297.00
	APRIL	$ 2,208,254.00	$ 945,779.00
	MAY	$ 2,449,025.00	$ 1,080,576.00
	JUNE	$ 2,620,419.00	$ 1,199,884.00
	JULY	$ 2,606,069.00	$ 1,236,099.00
	AUGUST	$ 2,493,106.00	$ 1,160,769.00
	SEPTEMBER	$ 2,532,061.00	$ 1,202,677.00
	OCTOBER	$ 2,361,348.00	$ 1,087,812.00
	NOVEMBER	$ 2,608,643.00	$ 1,252,812.00
	DECEMBER	$ 2,285,011.00	$ 1,086,009.00
8B	Total Dollar Amount Residential Accounts in Arrears not on Agreements - by Month		
	JANUARY	$ 4,338,431.00	$ 2,183,552.00
	FEBRUARY	$ 4,439,906.00	$ 2,269,126.00
	MARCH	$ 4,349,476.00	$ 2,164,289.00
	APRIL	$ 4,093,954.00	$ 1,909,770.00
	MAY	$ 3,524,463.00	$ 1,597,521.00
	JUNE	$ 3,218,857.00	$ 1,384,660.00
	JULY	$ 2,841,911.00	$ 1,174,493.00
	AUGUST	$ 2,303,320.00	$ 808,854.00
	SEPTEMBER	$ 2,437,189.00	$ 859,245.00
	OCTOBER	$ 2,831,006.00	$ 1,101,733.00
	NOVEMBER	$ 3,616,667.00	$ 1,579,476.00
	DECEMBER	$ 5,062,280.00	$ 2,280,601.00
9	Total Number Residential Payment Troubled Customers - by Month		
	JANUARY	5,776.00	2,873.00
	FEBRUARY	6,220.00	3,138.00
	MARCH	6,397.00	3,240.00
	APRIL	6,512.00	3,290.00
	MAY	6,621.00	3,361.00
	JUNE	6,738.00	3,426.00
	JULY	6,593.00	3,350.00
	AUGUST	6,601.00	3,294.00
	SEPTEMBER	6,587.00	3,208.00
	OCTOBER	6,670.00	3,216.00
	NOVEMBER	7,181.00	3,419.00
	DECEMBER	7,489.00	3,495.00
10	Total Number Terminations - by Month		
	JANUARY	0.00	0.00
	FEBRUARY	0.00	0.00

	MARCH	0.00	0.00
	APRIL	1,201.00	592.00
	MAY	1,187.00	495.00
	JUNE	1,458.00	611.00
	JULY	964.00	465.00
	AUGUST	1,175.00	580.00
	SEPTEMBER	498.00	280.00
	OCTOBER	242.00	152.00
	NOVEMBER	136.00	85.00
	DECEMBER	0.00	0.00
11	Total Number Reconnections - by Month		
	JANUARY	50.00	32.00
	FEBRUARY	21.00	16.00
	MARCH	11.00	6.00
	APRIL	670.00	346.00
	MAY	661.00	294.00
	JUNE	689.00	296.00
	JULY	596.00	278.00
	AUGUST	595.00	285.00
	SEPTEMBER	564.00	311.00
	OCTOBER	597.00	300.00
	NOVEMBER	430.00	239.00
	DECEMBER	119.00	61.00
12	Total Number Low Income Households		58,488.00
	Submit Estimation Methodology in a Separate Document	UPLOAD DOCUMENT	
12B	Annual Residential Revenues	$ 194,858,722.00	$ 23,657,972.00

LIURP REPORTING

Line	Description	VALUE
13	Program Costs/Actual Spending for the Year Just Completed	$ 847,500.00
14	Number of Household Members Under Age 18	1.47
15	Number of Household Members Over Age 62	0.28
16	Household Size	3.28
17	Income	$ 24,784.00
18	Source of Income	
	Employment	34.00
	Public Assistance	1.00
	Pension/Retirement	17.00
	Unemployment Compensation	0.00
	Disability	21.00
	Other (includes Missing Data)	5.00
19	Participation Levels by Month - Reporting Year	
Heating Jobs		
	JANUARY	8.00
	FEBRUARY	4.00
	MARCH	5.00
	APRIL	6.00

	MAY		6.00
	JUNE		5.00
	JULY		10.00
	AUGUST		9.00
	SEPTEMBER		4.00
	OCTOBER		10.00
	NOVEMBER		5.00
	DECEMBER		6.00
Water Heating Jobs			
	JANUARY		0.00
	FEBRUARY		0.00
	MARCH		0.00
	APRIL		0.00
	MAY		0.00
	JUNE		0.00
	JULY		0.00
	AUGUST		0.00
	SEPTEMBER		0.00
	OCTOBER		0.00
	NOVEMBER		0.00
	DECEMBER		0.00
Baseload Jobs			
	JANUARY		0.00
	FEBRUARY		0.00
	MARCH		0.00
	APRIL		0.00
	MAY		0.00
	JUNE		0.00
	JULY		0.00
	AUGUST		0.00
	SEPTEMBER		0.00
	OCTOBER		0.00
	NOVEMBER		0.00
	DECEMBER		0.00
20	Project Spending for Current Year	$	3,388,596.00
21	Projected Annual Production Number - Current Year		
	Heating Jobs		486.00
	Water Heating Jobs		0.00
	Baseload Jobs		0.00
22	Average Job Costs		
	Heating Jobs	$	5,409.00
	Water Heating Jobs	$	-
	Baseload Jobs	$	-
22A	Source of Intake		
	Distribution Company		48.00
	Community Base Organization		30.00
	Other		0.00
22B	Participants in Multiple Programs		
	LIURP AND CAP		48.00
	LIURP AND CARES		0.00
	LIURP AND HARDSHIP FUNDS		0.00

LIURP, CAP AND CARES	0.00
LIURP, CAP AND HARDSHIP FUNDS	2.00
LIURP, CARES AND HARDSHIP FUNDS	0.00
LIURP, CAP, CARES, AND HARDSHIP FUNDS	0.00

CAP REPORTING

Line	Description	VALUE	
23	Program Costs - Administration	$	212,583.00
24	Program Costs - CAP Credits	$	1,923,734.00
25	Program Costs - Preprogram Arrearage Forgiveness	$	274,255.00
26A	Program Costs - CAP Accounts in Arrears - not on a Payment Agreement ($)	$	-
26B	Program Costs - CAP Accounts in Arrears - on a Payment Agreement ($)	$	-
27A	Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)		0.00
27B	Program Costs - CAP Accounts in Arrears - on a Payment Agreement (#)		0.00
28	Number of Household Members Under Age 18		0.69
29	Number of Household Members Over Age 62		0.56
30	Household Size		2.07
31	Income	$	14,945.00
32	Source of Income		
	Employment		1,645.00
	Public Assistance		65.00
	Pension/Retirement		1,681.00
	Unemployment Compensation		88.00
	Disability		2,971.00
	Other (includes Missing Data)		343.00
	PARTICIPATION LEVELS BY MONTH		
33	Income at or below 50% of Poverty		
	JANUARY		753.00
	FEBRUARY		855.00
	MARCH		855.00
	APRIL		860.00
	MAY		844.00
	JUNE		845.00
	JULY		872.00
	AUGUST		843.00
	SEPTEMBER		859.00
	OCTOBER		919.00
	NOVEMBER		851.00
	DECEMBER		941.00
34	Income between 51% and 100% of Poverty		
	JANUARY		2,909.00
	FEBRUARY		3,524.00
	MARCH		3,496.00

	APRIL		3,490.00
	MAY		3,441.00
	JUNE		3,455.00
	JULY		3,494.00
	AUGUST		3,403.00
	SEPTEMBER		3,355.00
	OCTOBER		3,454.00
	NOVEMBER		3,292.00
	DECEMBER		3,401.00
35	Income between 101% and 150% of Poverty		
	JANUARY		2,681.00
	FEBRUARY		2,665.00
	MARCH		2,642.00
	APRIL		2,630.00
	MAY		2,610.00
	JUNE		2,601.00
	JULY		2,507.00
	AUGUST		2,554.00
	SEPTEMBER		2,512.00
	OCTOBER		2,488.00
	NOVEMBER		2,469.00
	DECEMBER		2,451.00
36	Participation Levels : Default Exits - Income at or below 50% of Poverty (#)		86.00
37	Participation Levels : Default Exits - Income at or between 51% and 100% of Poverty (#)		342.00
38	Participation Levels : Default Exits - Income at or between 100% and 150% of Poverty (#)		259.00
39	Participation Levels : Exits other than Defaults (#)		1,262.00
40	Energy Assistance Benefits ($)	$	3,587,417.00
41	Energy Assistance Benefits (#)		9,254.00
42	Number of Full CAP Payments by Month		
	JANUARY		5,650.00
	FEBRUARY		5,570.00
	MARCH		5,528.00
	APRIL		5,416.00
	MAY		5,250.00
	JUNE		5,131.00
	JULY		5,050.00
	AUGUST		5,426.00
	SEPTEMBER		5,266.00
	OCTOBER		5,166.00
	NOVEMBER		4,935.00
	DECEMBER		4,814.00
43	Total Annual CAP Billed Amount - (used to calculate Average CAP Bills)	$	5,588,737.00
44	Total Number of CAP Bills Rendered by Month		
	JANUARY		6,751.00
	FEBRUARY		7,513.00
	MARCH		7,467.00
	APRIL		7,452.00

	MAY		7,388.00
	JUNE		7,386.00
	JULY		6,873.00
	AUGUST		7,426.00
	SEPTEMBER		7,358.00
	OCTOBER		6,861.00
	NOVEMBER		7,196.00
	DECEMBER		7,240.00
45	Total Cash Payments by CAP Customers	$	2,206,692.00
46	Number of Full, On-Time Payments		56,362.00
46A	Source of Intake		
	Distribution Company		6,793.00
	Community Base Organization		0.00
	Other		0.00
46B	Participants in Multiple Programs		
	CAP AND LIURP		48.00
	CAP AND CARES		4.00
	CAP AND HARDSHIP FUNDS		47.00
	CAP, LIURP AND CARES		0.00
	CAP, LIURP AND HARDSHIP FUNDS		2.00
	CAP, CARES AND HARDSHIP FUNDS		0.00
	LIURP, CAP, CARES, AND HARDSHIP FUNDS		0.00

CARES REPORTING

Line	Description	VALUE	
47	Program Costs	$	4,587.00
48	Number of Household Members Under Age 18		0.12
49	Number of Household Members Over Age 62		0.71
50	Household Size		1.17
51	Income	$	16,942.00
52	Source of Income		
	Employment		2.00
	Public Assistance		0.00
	Pension/Retirement		13.00
	Unemployment Compensation		0.00
	Disability		0.00
	Other (includes Missing Data)		7.00
53	PARTICIPATION LEVELS BY MONTH		
	JANUARY		1.00
	FEBRUARY		2.00
	MARCH		3.00
	APRIL		0.00
	MAY		1.00
	JUNE		1.00
	JULY		1.00
	AUGUST		4.00
	SEPTEMBER		5.00

	OCTOBER		1.00
	NOVEMBER		2.00
	DECEMBER		1.00
54	Energy Assistance Benefits ($) - LIHEAP Cash Grants (CARES)	$	5,714.00
55	Energy Assistance Benefits (#) - LIHEAP Cash Grants (CARES)		7.00
56	Energy Assistance Benefits ($) - LIHEAP Crisis Grants (CARES)	$	803.00
57	Energy Assistance Benefits (#) - LIHEAP Crisis Grants (CARES)		1.00
58	Energy Assistance Benefits ($) - Outreach Efforts - LIHEAP Cash Grants (CARES)	$	11,343,227.00
59	Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (CARES)		14,614.00
60	Energy Assistance Benefits ($) - Outreach Efforts - LIHEAP Crisis Grants (CARES)	$	1,329,201.00
61	Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (CARES)		2,956.00
62	Direct Dollars Applied to CARES Accounts ($)	$	6,517.00
63	Direct Dollars Applied to CARES Accounts (#)		7.00
64	Cares Benefits (#) - Number of Customers Referred to CARES		22.00
65	Cares Benefits (#) - Number of Customers Accepted into CARES		22.00
65A	Source of Intake		
	Distribution Company		22.00
	Community- Based Organization		0.00
	Other (includes Missing Data)		0.00
65B	Participants in Multiple Programs		
	CARES AND LIURP		0.00
	CARES AND CAP		4.00
	CARES AND HARDSHIP FUND		0.00
	CARES, LIURP AND CAP		0.00
	CARES, LIURP AND HARSHP FUND		0.00
	CARES, CAP AND HARDSHIP FUND		0.00
	CARES, LIURP, CAP, AND HARDSHIP FUND		0.00

HARDSHIP REPORTING

Line	Description	VALUE	
66	Program Costs (Administrative Costs Only)		
	Administrative Costs from Rate Base	$	-
	Administrative Costs from Shareholders	$	-
67	Number of Household Members Under Age 18		0.46
68	Number of Household Members Over Age 62		0.48
69	Household Size		2.05
70	Income	$	20,806.00
71	Source of Income		
	Employment		47.00
	Public Assistance		1.00
	Pension/Retirement		54.00
	Unemployment Compensation		3.00

	Disability		36.00
	Other (includes Missing Data)		51.00
72	Participation Levels by Month (#)		
	NOVEMBER		4.00
	DECEMBER		7.00
	JANUARY		15.00
	FEBRUARY		14.00
	MARCH		17.00
	APRIL		3.00
	MAY		2.00
	JUNE		50.00
	JULY		29.00
	AUGUST		31.00
	SEPTEMBER		13.00
	OCTOBER		7.00
73	Ratepayer/Employee Contributions ($)	$	51,212.00
74	Special Contributions ($)		
	Citizens Energy Corporation	$	-
	Companies Other than Utilities	$	-
	Settlements and Fines	$	-
	Other	$	300.00
75	Utility contributions ($) - Initial Grant (Excluding admin $ and Grants dependent on ratepayer match	$	-
76	Utility Contributions ($) - Excluding #66 and #75)	$	67,000.00
77	Utility Contributions ($) - (dependent upon a match from customer contributions)	$	67,000.00
78	Outreach Contacts	UPLOAD FILE	
79	Cash Benefits (#)		192.00
80	Cash Benefits ($)	$	68,553.00
80A	Source of Intake		
	Distribution Company		0.00
	Community- Based Organization		192.00
	Other (includes Missing Data)		0.00
80B	Participants in Multiple Programs		
	Hardship Fund and LIURP		0.00
	Hardship Fund and CAP		48.00
	Hardship Fund and CARES		0.00
	Hardship Fund, LIURP and CAP		2.00
	Hardship Fund, LIURP and CARES		0.00
	Hardship Fund, CARES and CAP		0.00
	Hardship Fund, LIURP, CAP and CARES		0.00

2023

COLLECTION REPORTING

Line	Description	All Residential	Confirmed Low Income
1	Total Number - Payment Arrangements	15,900.00	7,695.00
2	Total Number - Successful Payment Arrangements	1,150.00	457.00
3	Annual collection Operating Expenses	$995,286.00	$240,143.09
4	Total Dollar Amount - Gross Residential Write-Offs	$3,459,665.00	$2,333,753.00
5	Total Dollar Amount - Net Residential Write-Offs	$2,719,986.00	$1,850,557.00
6	Total Number Residential Customers - by Month		
	JANUARY	197,569.00	24,282.00
	FEBRUARY	197,602.00	24,546.00
	MARCH	197,765.00	24,750.00
	APRIL	196,998.00	24,560.00
	MAY	196,055.00	24,297.00
	JUNE	195,534.00	23,929.00
	JULY	194,988.00	23,646.00
	AUGUST	194,816.00	23,289.00
	SEPTEMBER	195,205.00	23,106.00
	OCTOBER	195,919.00	23,211.00
	NOVEMBER	196,994.00	23,527.00
	DECEMBER	197,488.00	23,825.00
7A	Total Number Residential Accounts in Arrears on Agreements - by Month		
	JANUARY	3,578.00	1,265.00
	FEBRUARY	4,020.00	1,259.00
	MARCH	4,695.00	1,484.00
	APRIL	5,437.00	1,812.00
	MAY	6,030.00	2,150.00
	JUNE	6,289.00	2,422.00
	JULY	6,549.00	2,682.00
	AUGUST	6,539.00	2,715.00
	SEPTEMBER	6,575.00	2,783.00
	OCTOBER	6,439.00	2,731.00
	NOVEMBER	6,165.00	2,617.00
	DECEMBER	5,170.00	2,080.00
7B	Total Number Residential Accounts in Arrears not on Agreements - by Month		
	JANUARY	15,789.00	5,000.00
	FEBRUARY	13,489.00	4,387.00
	MARCH	13,069.00	4,311.00
	APRIL	13,204.00	4,215.00
	MAY	11,618.00	3,275.00
	JUNE	12,119.00	2,989.00

	JULY	12,200.00	2,908.00
	AUGUST	12,233.00	2,932.00
	SEPTEMBER	13,807.00	3,189.00
	OCTOBER	13,114.00	3,040.00
	NOVEMBER	13,688.00	3,391.00
	DECEMBER	16,225.00	4,251.00
8A	Total Dollar Amount Residential Accounts in Arrears on Agreements - by Month		
	JANUARY	$1,766,462.20	$740,915.59
	FEBRUARY	$1,909,126.33	$697,345.64
	MARCH	$2,493,614.91	$913,769.78
	APRIL	$2,996,806.55	$1,161,630.03
	MAY	$3,278,244.23	$1,301,295.43
	JUNE	$3,582,023.54	$1,498,491.47
	JULY	$3,672,105.51	$1,648,825.21
	AUGUST	$3,642,309.94	$1,642,727.88
	SEPTEMBER	$3,791,839.97	$1,763,466.20
	OCTOBER	$3,832,596.99	$1,752,050.38
	NOVEMBER	$3,749,534.53	$1,709,131.54
	DECEMBER	$3,009,098.66	$1,313,512.22
8B	Total Dollar Amount Residential Accounts in Arrears not on Agreements - by Month		
	JANUARY	$6,219,888.88	$3,019,039.58
	FEBRUARY	$5,921,939.11	$2,909,143.60
	MARCH	$5,940,328.76	$2,925,901.85
	APRIL	$5,384,351.90	$2,513,944.32
	MAY	$4,159,170.19	$1,723,110.12
	JUNE	$3,545,162.69	$1,308,194.19
	JULY	$3,416,815.57	$1,257,746.95
	AUGUST	$3,094,156.06	$1,230,966.80
	SEPTEMBER	$3,397,869.98	$1,320,853.86
	OCTOBER	$3,290,044.10	$1,374,886.55
	NOVEMBER	$3,538,272.36	$1,556,817.29
	DECEMBER	$4,876,428.17	$2,217,291.10
9	Total Number Residential Payment Troubled Customers - by Month		
	JANUARY	7,453.00	3,422.00
	FEBRUARY	7,480.00	3,392.00
	MARCH	7,581.00	3,365.00
	APRIL	7,686.00	3,384.00
	MAY	7,795.00	3,382.00
	JUNE	7,864.00	3,393.00
	JULY	8,057.00	3,469.00
	AUGUST	8,264.00	3,601.00
	SEPTEMBER	8,459.00	3,709.00
	OCTOBER	8,457.00	3,728.00
	NOVEMBER	8,541.00	3,765.00
	DECEMBER	8,607.00	3,807.00
10	Total Number Terminations - by Month		
	JANUARY	0.00	0.00
	FEBRUARY	0.00	0.00

	MARCH	0.00	0.00
	APRIL	1,494.00	685.00
	MAY	1,271.00	536.00
	JUNE	1,147.00	507.00
	JULY	867.00	406.00
	AUGUST	973.00	497.00
	SEPTEMBER	604.00	310.00
	OCTOBER	538.00	280.00
	NOVEMBER	87.00	47.00
	DECEMBER	0.00	0.00
11	Total Number Reconnections - by Month	[redacted]	[redacted]
	JANUARY	36.00	16.00
	FEBRUARY	22.00	15.00
	MARCH	10.00	6.00
	APRIL	700.00	319.00
	MAY	678.00	299.00
	JUNE	566.00	267.00
	JULY	491.00	223.00
	AUGUST	558.00	290.00
	SEPTEMBER	622.00	330.00
	OCTOBER	824.00	412.00
	NOVEMBER	517.00	274.00
	DECEMBER	114.00	58.00
12	Total Number Low Income Households	[redacted]	58,066.00
	Submit Estimation Methodology in a Separate Document	UPLOAD DOCUMENT	
12B	Annual Residential Revenues	$ 180,667,743.00	$ 22,908,764.35

LIURP REPORTING

Line	Description	VALUE
13	Program Costs/Actual Spending for the Year Just Completed	$ 1,059,417.84
14	Number of Household Members Under Age 18	1.4
15	Number of Household Members Over Age 62	0.27
16	Household Size	3.14
17	Income	$ 25,117.90
18	Source of Income	[redacted]
	Employment	39.00
	Public Assistance	0.00
	Pension/Retirement	15.00
	Unemployment Compensation	4.00
	Disability	14.00
	Other (includes Missing Data)	6.00
19	Participation Levels by Month - Reporting Year	[redacted]
Heating Jobs		
	JANUARY	9.00
	FEBRUARY	4.00
	MARCH	7.00
	APRIL	5.00

	MAY		4.00
	JUNE		4.00
	JULY		6.00
	AUGUST		6.00
	SEPTEMBER		10.00
	OCTOBER		6.00
	NOVEMBER		6.00
	DECEMBER		11.00
Water Heating Jobs			
	JANUARY		0.00
	FEBRUARY		0.00
	MARCH		0.00
	APRIL		0.00
	MAY		0.00
	JUNE		0.00
	JULY		0.00
	AUGUST		0.00
	SEPTEMBER		0.00
	OCTOBER		0.00
	NOVEMBER		0.00
	DECEMBER		0.00
Baseload Jobs			
	JANUARY		0.00
	FEBRUARY		0.00
	MARCH		0.00
	APRIL		0.00
	MAY		0.00
	JUNE		0.00
	JULY		0.00
	AUGUST		0.00
	SEPTEMBER		0.00
	OCTOBER		0.00
	NOVEMBER		0.00
	DECEMBER		0.00
20	Project Spending for Current Year	$	3,681,496.62
21	Projected Annual Production Number - Current Year		
	Heating Jobs		399.00
	Water Heating Jobs		0.00
	Baseload Jobs		0.00
22	Average Job Costs		
	Heating Jobs	$	6,983.71
	Water Heating Jobs	$	-
	Baseload Jobs	$	-
22A	Source of Intake		
	Distribution Company		44.00
	Community Base Organization		34.00
	Other		0.00
22B	Participants in Multiple Programs		
	LIURP AND CAP		44.00
	LIURP AND CARES		0.00
	LIURP AND HARDSHIP FUNDS		0.00

LIURP, CAP AND CARES	0.00
LIURP, CAP AND HARDSHIP FUNDS	0.00
LIURP, CARES AND HARDSHIP FUNDS	0.00
LIURP, CAP, CARES, AND HARDSHIP FUNDS	0.00

CAP REPORTING

Line	Description	VALUE	
23	Program Costs - Administration	$	423,908.28
24	Program Costs - CAP Credits	$	2,111,283.07
25	Program Costs - Preprogram Arrearage Forgiveness	$	436,770.41
26A	Program Costs - CAP Accounts in Arrears - not on a Payment Agreement ($)	$	-
26B	Program Costs - CAP Accounts in Arrears - on a Payment Agreement ($)	$	-
27A	Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)		0.00
27B	Program Costs - CAP Accounts in Arrears - on a Payment Agreement (#)		0.00
28	Number of Household Members Under Age 18		0.84
29	Number of Household Members Over Age 62		0.53
30	Household Size		2.22
31	Income	$	14,986.14
32	Source of Income		
	Employment		1,818.00
	Public Assistance		0.00
	Pension/Retirement		1,555.00
	Unemployment Compensation		70.00
	Disability		2,724.00
	Other (includes Missing Data)		910.00
	PARTICIPATION LEVELS BY MONTH		
33	Income at or below 50% of Poverty		
	JANUARY		1,026.00
	FEBRUARY		1,043.00
	MARCH		1,215.00
	APRIL		1,348.00
	MAY		1,407.00
	JUNE		1,447.00
	JULY		1,508.00
	AUGUST		1,617.00
	SEPTEMBER		1,686.00
	OCTOBER		1,646.00
	NOVEMBER		1,518.00
	DECEMBER		1,593.00
34	Income between 51% and 100% of Poverty		
	JANUARY		3,296.00
	FEBRUARY		3,270.00
	MARCH		3,384.00

	APRIL		3,441.00
	MAY		3,436.00
	JUNE		3,410.00
	JULY		3,410.00
	AUGUST		3,470.00
	SEPTEMBER		3,518.00
	OCTOBER		3,366.00
	NOVEMBER		3,101.00
	DECEMBER		3,194.00
35	Income between 101% and 150% of Poverty		
	JANUARY		2,414.00
	FEBRUARY		2,393.00
	MARCH		2,471.00
	APRIL		2,502.00
	MAY		2,518.00
	JUNE		2,499.00
	JULY		2,523.00
	AUGUST		2,588.00
	SEPTEMBER		2,616.00
	OCTOBER		2,498.00
	NOVEMBER		2,308.00
	DECEMBER		2,290.00
36	Participation Levels : Default Exits - Income at or below 50% of Poverty (#)		223.00
37	Participation Levels : Default Exits - Income at or between 51% and 100% of Poverty (#)		527.00
38	Participation Levels : Default Exits - Income at or between 100% and 150% of Poverty (#)		388.00
39	Participation Levels : Exits other than Defaults (#)		1,557.00
40	Energy Assistance Benefits ($)	$	2,235,227.54
41	Energy Assistance Benefits (#)		9,008.00
42	Number of Full CAP Payments by Month		
	JANUARY		4,719.00
	FEBRUARY		5,234.00
	MARCH		5,343.00
	APRIL		5,425.00
	MAY		5,166.00
	JUNE		5,066.00
	JULY		4,879.00
	AUGUST		4,561.00
	SEPTEMBER		4,693.00
	OCTOBER		4,996.00
	NOVEMBER		4,509.00
	DECEMBER		4,542.00
43	Total Annual CAP Billed Amount - (used to calculate Average CAP Bills)	$	5,255,002.74
44	Total Number of CAP Bills Rendered by Month		
	JANUARY		6,780.00
	FEBRUARY		6,815.00
	MARCH		7,035.00
	APRIL		7,329.00

	MAY		7,510.00
	JUNE		7,523.00
	JULY		7,570.00
	AUGUST		7,729.00
	SEPTEMBER		7,953.00
	OCTOBER		8,003.00
	NOVEMBER		7,479.00
	DECEMBER		7,072.00
45	Total Cash Payments by CAP Customers	$	2,851,593.26
46	Number of Full, On-Time Payments		49,042.00
46A	Source of Intake		
	Distribution Company		7,077.00
	Community Base Organization		0.00
	Other		0.00
46B	Participants in Multiple Programs		
	CAP AND LIURP		44.00
	CAP AND CARES		4.00
	CAP AND HARDSHIP FUNDS		108.00
	CAP, LIURP AND CARES		0.00
	CAP, LIURP AND HARDSHIP FUNDS		0.00
	CAP, CARES AND HARDSHIP FUNDS		0.00
	LIURP, CAP, CARES, AND HARDSHIP FUNDS		0.00

CARES REPORTING

Line	Description	VALUE	
47	Program Costs	$	5,086.50
48	Number of Household Members Under Age 18		0.18
49	Number of Household Members Over Age 62		0.77
50	Household Size		1.41
51	Income	$	16,798.59
52	Source of Income		
	Employment		1.00
	Public Assistance		0.00
	Pension/Retirement		13.00
	Unemployment Compensation		0.00
	Disability		0.00
	Other (includes Missing Data)		6.00
53	PARTICIPATION LEVELS BY MONTH		
	JANUARY		0.00
	FEBRUARY		4.00
	MARCH		0.00
	APRIL		2.00
	MAY		0.00
	JUNE		2.00
	JULY		1.00
	AUGUST		1.00
	SEPTEMBER		2.00

	OCTOBER		1.00
	NOVEMBER		2.00
	DECEMBER		5.00
54	Energy Assistance Benefits ($) - LIHEAP Cash Grants (CARES)	$	2,850.00
55	Energy Assistance Benefits (#) - LIHEAP Cash Grants (CARES)		7.00
56	Energy Assistance Benefits ($) - LIHEAP Crisis Grants (CARES)	$	4,460.80
57	Energy Assistance Benefits (#) - LIHEAP Crisis Grants (CARES)		5.00
58	Energy Assistance Benefits ($) - Outreach Efforts - LIHEAP Cash Grants (CARES)	$	7,512,018.00
59	Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (CARES)		14,412.00
60	Energy Assistance Benefits ($) - Outreach Efforts - LIHEAP Crisis Grants (CARES)	$	2,009,932.00
61	Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (CARES)		3,257.00
62	Direct Dollars Applied to CARES Accounts ($)	$	8,272.03
63	Direct Dollars Applied to CARES Accounts (#)		10.00
64	Cares Benefits (#) - Number of Customers Referred to CARES		20.00
65	Cares Benefits (#) - Number of Customers Accepted into CARES		20.00
65A	Source of Intake		
	Distribution Company		20.00
	Community- Based Organization		0.00
	Other (includes Missing Data)		0.00
65B	Participants in Multiple Programs		
	CARES AND LIURP		0.00
	CARES AND CAP		4.00
	CARES AND HARDSHIP FUND		0.00
	CARES, LIURP AND CAP		0.00
	CARES, LIURP AND HARSHP FUND		0.00
	CARES, CAP AND HARDSHIP FUND		0.00
	CARES, LIURP, CAP, AND HARDSHIP FUND		0.00

HARDSHIP REPORTING

Line	Description	VALUE	
66	Program Costs (Administrative Costs Only		
	Administrative Costs from Rate Base	$	-
	Administrative Costs from Shareholders	$	-
67	Number of Household Members Under Age 18		0.91
68	Number of Household Members Over Age 62		1.86
69	Household Size		2.77
70	Income	$	27,372.30
71	Source of Income		
	Employment		101.00
	Public Assistance		14.00
	Pension/Retirement		86.00
	Unemployment Compensation		8.00

	Disability		99.00
	Other (includes Missing Data)		98.00
72	Participation Levels by Month (#)		
	NOVEMBER		32.00
	DECEMBER		17.00
	JANUARY		7.00
	FEBRUARY		39.00
	MARCH		26.00
	APRIL		29.00
	MAY		19.00
	JUNE		38.00
	JULY		32.00
	AUGUST		56.00
	SEPTEMBER		56.00
	OCTOBER		55.00
73	Ratepayer/Employee Contributions ($)	$	36,683.88
74	Special Contributions ($)		
	Citizens Energy Corporation	$	-
	Companies Other than Utilities	$	-
	Settlements and Fines	$	-
	Other	$	255.00
75	Utility contributions ($) - Initial Grant (Excluding admin $ and Grants dependent on ratepayer match	$	-
76	Utility Contributions ($) - Excluding #66 and #75)	$	92,000.00
77	Utility Contributions ($) - (dependent upon a match from customer contributions)	$	92,000.00
78	Outreach Contacts	UPLOAD File	
79	Cash Benefits (#)		406.00
80	Cash Benefits ($)	$	150,951.50
80A	Source of Intake		
	Distribution Company		0.00
	Community- Based Organization		406.00
	Other (includes Missing Data)		0.00
80B	Participants in Multiple Programs		
	Hardship Fund and LIURP		0.00
	Hardship Fund and CAP		108.00
	Hardship Fund and CARES		0.00
	Hardship Fund, LIURP and CAP		0.00
	Hardship Fund, LIURP and CARES		0.00
	Hardship Fund, CARES and CAP		0.00
	Hardship Fund, LIURP, CAP and CARES		0.00

2024

COLLECTION REPORTING

Line	Description	All Residential	Confirmed Low Income
1	Total Number - Payment Arrangements	12,522.00	6,340.00
2	Total Number - Successful Payment Arrangements	900.00	387.00
3	Annual collection Operating Expenses	$ 993,680.00	$ 237,281.99
4	Total Dollar Amount - Gross Residential Write-Offs	$ 3,968,354.00	$ 2,720,676.00
5	Total Dollar Amount - Net Residential Write-Offs	$ 3,197,962.00	$ 2,371,744.00
6	Total Number Residential Customers - by Month		
	JANUARY	197,638.00	24,130.00
	FEBRUARY	197,647.00	24,286.00
	MARCH	197,715.00	24,387.00
	APRIL	197,088.00	24,298.00
	MAY	196,522.00	24,092.00
	JUNE	196,115.00	23,842.00
	JULY	195,589.00	23,523.00
	AUGUST	195,474.00	23,123.00
	SEPTEMBER	195,304.00	22,929.00
	OCTOBER	196,086.00	22,972.00
	NOVEMBER	196,960.00	23,151.00
	DECEMBER	197,411.00	23,570.00
7A	Total Number Residential Accounts in Arrears on Agreements - by Month		
	JANUARY	4,099.00	1,523.00
	FEBRUARY	4,235.00	1,445.00
	MARCH	4,793.00	1,688.00
	APRIL	5,549.00	2,169.00
	MAY	5,685.00	2,253.00
	JUNE	5,518.00	2,174.00
	JULY	5,505.00	2,207.00
	AUGUST	5,835.00	2,467.00
	SEPTEMBER	6,059.00	2,625.00
	OCTOBER	6,468.00	2,871.00
	NOVEMBER	6,623.00	2,957.00
	DECEMBER	6,658.00	2,959.00
7B	Total Number Residential Accounts in Arrears not on Agreements - by Month		
	JANUARY	16,100.00	4,966.00
	FEBRUARY	13,823.00	4,489.00
	MARCH	13,514.00	4,394.00
	APRIL	12,158.00	3,861.00
	MAY	12,029.00	3,263.00
	JUNE	13,322.00	3,272.00

	JULY	12,952.00	3,121.00
	AUGUST	13,109.00	3,049.00
	SEPTEMBER	13,516.00	3,102.00
	OCTOBER	12,182.00	2,648.00
	NOVEMBER	12,543.00	2,749.00
	DECEMBER	13,246.00	2,987.00
8A	Total Dollar Amount Residential Accounts in Arrears on Agreements - by Month		
	JANUARY	$ 2,048,463.94	$ 831,496.76
	FEBRUARY	$ 2,022,411.32	$ 748,894.59
	MARCH	$ 2,585,009.92	$ 994,874.07
	APRIL	$ 3,042,963.38	$ 1,253,965.68
	MAY	$ 3,002,863.09	$ 1,272,571.37
	JUNE	$ 2,909,339.21	$ 1,207,731.98
	JULY	$ 2,828,474.34	$ 1,241,850.30
	AUGUST	$ 3,027,974.17	$ 1,391,132.29
	SEPTEMBER	$ 3,190,554.13	$ 1,487,358.43
	OCTOBER	$ 3,484,765.24	$ 1,669,443.23
	NOVEMBER	$ 3,772,560.94	$ 1,816,525.63
	DECEMBER	$ 3,923,191.22	$ 1,845,273.56
8B	Total Dollar Amount Residential Accounts in Arrears not on Agreements - by Month		
	JANUARY	$ 6,077,129.19	$ 2,961,810.09
	FEBRUARY	$ 5,640,387.88	$ 2,814,131.77
	MARCH	$ 5,180,959.77	$ 2,514,260.12
	APRIL	$ 3,962,244.73	$ 1,841,185.80
	MAY	$ 3,235,966.00	$ 1,325,701.13
	JUNE	$ 3,130,687.74	$ 1,184,133.93
	JULY	$ 2,794,962.87	$ 1,075,384.99
	AUGUST	$ 2,364,133.64	$ 878,378.86
	SEPTEMBER	$ 2,270,528.76	$ 828,817.51
	OCTOBER	$ 1,902,972.27	$ 658,165.55
	NOVEMBER	$ 1,970,826.06	$ 713,277.07
	DECEMBER	$ 2,240,063.43	$ 802,788.48
9	Total Number Residential Payment Troubled Customers - by Month		
	JANUARY	8,956.00	4,002.00
	FEBRUARY	9,089.00	4,064.00
	MARCH	9,054.00	4,096.00
	APRIL	8,999.00	4,105.00
	MAY	8,931.00	4,091.00
	JUNE	8,803.00	4,048.00
	JULY	8,738.00	4,016.00
	AUGUST	8,507.00	3,903.00
	SEPTEMBER	10,097.00	4,634.00
	OCTOBER	10,787.00	4,937.00
	NOVEMBER	10,857.00	5,017.00
	DECEMBER	10,720.00	4,939.00
10	Total Number Terminations - by Month		
	JANUARY	0.00	0.00
	FEBRUARY	0.00	0.00

	MARCH	0.00	0.00
	APRIL	1,556.00	629.00
	MAY	1,031.00	394.00
	JUNE	906.00	361.00
	JULY	909.00	425.00
	AUGUST	850.00	411.00
	SEPTEMBER	657.00	301.00
	OCTOBER	557.00	285.00
	NOVEMBER	169.00	89.00
	DECEMBER	0.00	0.00
11	Total Number Reconnections - by Month		
	JANUARY	54.00	22.00
	FEBRUARY	24.00	11.00
	MARCH	9.00	5.00
	APRIL	838.00	369.00
	MAY	631.00	256.00
	JUNE	541.00	216.00
	JULY	434.00	181.00
	AUGUST	556.00	262.00
	SEPTEMBER	535.00	392.00
	OCTOBER	832.00	254.00
	NOVEMBER	481.00	254.00
	DECEMBER	166.00	90.00
12	Total Number Low Income Households		59,101.00
	Submit Estimation Methodology in a Separate Document	UPLOAD DOCUMENT	
12B	Annual Residential Revenues	$ 142,464,678.00	$ 19,670,520.14

LIURP REPORTING

Line	Description	VALUE
13	Program Costs/Actual Spending for the Year Just Completed	$ 1,447,703.63
14	Number of Household Members Under Age 18	1.5
15	Number of Household Members Over Age 62	0.43
16	Household Size	3.43
17	Income	$ 27,294.57
18	Source of Income	
	Employment	49.00
	Public Assistance	0.00
	Pension/Retirement	18.00
	Unemployment Compensation	9.00
	Disability	23.00
	Other (includes Missing Data)	2.00
19	Participation Levels by Month - Reporting Year	
Heating Jobs		
	JANUARY	4.00
	FEBRUARY	5.00
	MARCH	3.00
	APRIL	7.00

	MAY		5.00
	JUNE		9.00
	JULY		10.00
	AUGUST		15.00
	SEPTEMBER		11.00
	OCTOBER		17.00
	NOVEMBER		11.00
	DECEMBER		4.00
Water Heating Jobs			
	JANUARY		0.00
	FEBRUARY		0.00
	MARCH		0.00
	APRIL		0.00
	MAY		0.00
	JUNE		0.00
	JULY		0.00
	AUGUST		0.00
	SEPTEMBER		0.00
	OCTOBER		0.00
	NOVEMBER		0.00
	DECEMBER		0.00
Baseload Jobs			
	JANUARY		0.00
	FEBRUARY		0.00
	MARCH		0.00
	APRIL		0.00
	MAY		0.00
	JUNE		0.00
	JULY		0.00
	AUGUST		0.00
	SEPTEMBER		0.00
	OCTOBER		0.00
	NOVEMBER		0.00
	DECEMBER		0.00
20	Project Spending for Current Year	$	3,702,157.99
21	Projected Annual Production Number - Current Year		
	Heating Jobs		321.00
	Water Heating Jobs		0.00
	Baseload Jobs		0.00
22	Average Job Costs		
	Heating Jobs	$	7,383.56
	Water Heating Jobs	$	-
	Baseload Jobs	$	-
22A	Source of Intake		
	Distribution Company		42.00
	Community Base Organization		59.00
	Other		0.00
22B	Participants in Multiple Programs		
	LIURP AND CAP		42.00
	LIURP AND CARES		0.00
	LIURP AND HARDSHIP FUNDS		0.00

LIURP, CAP AND CARES	0.00
LIURP, CAP AND HARDSHIP FUNDS	0.00
LIURP, CARES AND HARDSHIP FUNDS	0.00
LIURP, CAP, CARES, AND HARDSHIP FUNDS	0.00

CAP REPORTING

Line	Description	VALUE	
23	Program Costs - Administration	$	392,438.27
24	Program Costs - CAP Credits	$	320,979.00
25	Program Costs - Preprogram Arrearage Forgiveness	$	1,086,214.88
26A	Program Costs - CAP Accounts in Arrears - not on a Payment Agreement ($)	$	-
26B	Program Costs - CAP Accounts in Arrears - on a Payment Agreement ($)	$	-
27A	Program Costs - CAP Accounts in Arrears - not on a Payment Agreement (#)		0.00
27B	Program Costs - CAP Accounts in Arrears - on a Payment Agreement (#)		0.00
28	Number of Household Members Under Age 18		0.88
29	Number of Household Members Over Age 62		0.35
30	Household Size		2.25
31	Income	$	16,033.29
32	Source of Income		
	Employment		1,665.00
	Public Assistance		0.00
	Pension/Retirement		1,041.00
	Unemployment Compensation		65.00
	Disability		2,448.00
	Other (includes Missing Data)		711.00
	PARTICIPATION LEVELS BY MONTH		
33	Income at or below 50% of Poverty		
	JANUARY		1,459.00
	FEBRUARY		1,256.00
	MARCH		1,248.00
	APRIL		1,436.00
	MAY		1,494.00
	JUNE		1,308.00
	JULY		1,262.00
	AUGUST		1,301.00
	SEPTEMBER		1,355.00
	OCTOBER		1,386.00
	NOVEMBER		1,394.00
	DECEMBER		1,350.00
34	Income between 51% and 100% of Poverty		
	JANUARY		2,943.00
	FEBRUARY		2,650.00
	MARCH		2,644.00

	APRIL		2,948.00
	MAY		2,985.00
	JUNE		2,818.00
	JULY		2,737.00
	AUGUST		2,754.00
	SEPTEMBER		2,794.00
	OCTOBER		2,799.00
	NOVEMBER		2,874.00
	DECEMBER		2,832.00
35	Income between 101% and 150% of Poverty		
	JANUARY		2,202.00
	FEBRUARY		2,000.00
	MARCH		1,996.00
	APRIL		1,749.00
	MAY		1,765.00
	JUNE		1,681.00
	JULY		1,634.00
	AUGUST		1,644.00
	SEPTEMBER		1,683.00
	OCTOBER		1,712.00
	NOVEMBER		1,749.00
	DECEMBER		1,748.00
36	Participation Levels : Default Exits - Income at or below 50% of Poverty (#)		658.00
37	Participation Levels : Default Exits - Income at or between 51% and 100% of Poverty (#)		1,368.00
38	Participation Levels : Default Exits - Income at or between 100% and 150% of Poverty (#)		873.00
39	Participation Levels : Exits other than Defaults (#)		1,090.00
40	Energy Assistance Benefits ($)	$	1,463,641.07
41	Energy Assistance Benefits (#)		4,355.00
42	Number of Full CAP Payments by Month		
	JANUARY		4,434.00
	FEBRUARY		4,060.00
	MARCH		3,916.00
	APRIL		0.00
	MAY		1,040.00
	JUNE		1,282.00
	JULY		1,304.00
	AUGUST		2,104.00
	SEPTEMBER		1,388.00
	OCTOBER		1,619.00
	NOVEMBER		2,067.00
	DECEMBER		1,818.00
43	Total Annual CAP Billed Amount - (used to calculate Average CAP Bills)	$	4,757,278.00
44	Total Number of CAP Bills Rendered by Month		
	JANUARY		6,930.00
	FEBRUARY		6,559.00
	MARCH		5,975.00
	APRIL		6,321.00

	MAY		6,236.00
	JUNE		6,163.00
	JULY		5,632.00
	AUGUST		5,650.00
	SEPTEMBER		5,687.00
	OCTOBER		5,791.00
	NOVEMBER		5,931.00
	DECEMBER		5,920.00
45	Total Cash Payments by CAP Customers	$	1,954,390.15
46	Number of Full, On-Time Payments		24,449.00
46A	Source of Intake		
	Distribution Company		5,930.00
	Community Base Organization		0.00
	Other		0.00
46B	Participants in Multiple Programs		
	CAP AND LIURP		42.00
	CAP AND CARES		9.00
	CAP AND HARDSHIP FUNDS		60.00
	CAP, LIURP AND CARES		0.00
	CAP, LIURP AND HARDSHIP FUNDS		0.00
	CAP, CARES AND HARDSHIP FUNDS		0.00
	LIURP, CAP, CARES, AND HARDSHIP FUNDS		0.00

CARES REPORTING

Line	Description	VALUE	
47	Program Costs	$	5,544.84
48	Number of Household Members Under Age 18		0.28
49	Number of Household Members Over Age 62		0.68
50	Household Size		1.68
51	Income	$	24,861.65
52	Source of Income		
	Employment		5.00
	Public Assistance		0.00
	Pension/Retirement		13.00
	Unemployment Compensation		0.00
	Disability		7.00
	Other (includes Missing Data)		1.00
53	PARTICIPATION LEVELS BY MONTH		
	JANUARY		4.00
	FEBRUARY		4.00
	MARCH		2.00
	APRIL		3.00
	MAY		1.00
	JUNE		0.00
	JULY		0.00
	AUGUST		0.00
	SEPTEMBER		0.00

	OCTOBER		1.00
	NOVEMBER		8.00
	DECEMBER		3.00
54	Energy Assistance Benefits ($) - LIHEAP Cash Grants (CARES)	$	3,164.00
55	Energy Assistance Benefits (#) - LIHEAP Cash Grants (CARES)		10.00
56	Energy Assistance Benefits ($) - LIHEAP Crisis Grants (CARES)	$	1,983.20
57	Energy Assistance Benefits (#) - LIHEAP Crisis Grants (CARES)		3.00
58	Energy Assistance Benefits ($) - Outreach Efforts - LIHEAP Cash Grants (CARES)	$	4,782,306.00
59	Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Cash Grants (CARES)		13,078.00
60	Energy Assistance Benefits ($) - Outreach Efforts - LIHEAP Crisis Grants (CARES)	$	1,167,718.00
61	Energy Assistance Benefits (#) - Outreach Efforts - LIHEAP Crisis Grants (CARES)		2,358.00
62	Direct Dollars Applied to CARES Accounts ($)	$	5,835.55
63	Direct Dollars Applied to CARES Accounts (#)		12.00
64	Cares Benefits (#) - Number of Customers Referred to CARES		26.00
65	Cares Benefits (#) - Number of Customers Accepted into CARES		26.00
65A	Source of Intake		
	Distribution Company		26.00
	Community- Based Organization		0.00
	Other (includes Missing Data)		0.00
65B	Participants in Multiple Programs		
	CARES AND LIURP		0.00
	CARES AND CAP		9.00
	CARES AND HARDSHIP FUND		0.00
	CARES, LIURP AND CAP		0.00
	CARES, LIURP AND HARSHP FUND		0.00
	CARES, CAP AND HARDSHIP FUND		0.00
	CARES, LIURP, CAP, AND HARDSHIP FUND		0.00

HARDSHIP REPORTING

Line	Description	VALUE	
66	Program Costs (Administrative Costs Only		
	Administrative Costs from Rate Base	$	-
	Administrative Costs from Shareholders	$	-
67	Number of Household Members Under Age 18		0.80
68	Number of Household Members Over Age 62		0.37
69	Household Size		1.67
70	Income	$	21,282.78
71	Source of Income		
	Employment		109.00
	Public Assistance		47.00
	Pension/Retirement		58.00
	Unemployment Compensation		13.00

	Disability		58.00
	Other (includes Missing Data)		51.00
72	Participation Levels by Month (#)		
	JANUARY		22.00
	FEBRUARY		17.00
	MARCH		5.00
	APRIL		21.00
	MAY		25.00
	JUNE		16.00
	JULY		57.00
	AUGUST		27.00
	SEPTEMBER		23.00
	OCTOBER		45.00
	NOVEMBER		36.00
	DECEMBER		42.00
73	Ratepayer/Employee Contributions ($)	$	32,453.63
74	Special Contributions ($)		
	Citizens Energy Corporation	$	-
	Companies Other than Utilities	$	-
	Settlements and Fines	$	-
	Other	$	385.00
75	Utility contributions ($) - Initial Grant (Excluding admin $ and Grants dependent on ratepayer match	$	-
76	Utility Contributions ($) - Excluding #66 and #75)	$	92,000.00
77	Utility Contributions ($) - (dependent upon a match from customer contributions)	$	92,000.00
78	Outreach Contacts	UPLOAD FILE	
79	Cash Benefits (#)		336.00
80	Cash Benefits ($)	$	123,403.78
80A	Source of Intake		
	Distribution Company		0.00
	Community- Based Organization		336.00
	Other (includes Missing Data)		0.00
80B	Participants in Multiple Programs		
	Hardship Fund and LIURP		0.00
	Hardship Fund and CAP		60.00
	Hardship Fund and CARES		0.00
	Hardship Fund, LIURP and CAP		0.00
	Hardship Fund, LIURP and CARES		0.00
	Hardship Fund, CARES and CAP		0.00
	Hardship Fund, LIURP, CAP and CARES		0.00

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

In Excel format, with all formulae intact, by month for the most recent 24 months available, please provide for residential customers: a. The bill at mean usage at existing rates in sufficient detail to allow replication: b. The bill at mean usage at proposed rates in sufficient detail to allow replication.

Response

Please see Attachment OCA-IV-15.xlsx.

Revenue Month	Mean Usage Mcf
1/31/2024	14.9
2/29/2024	14.9
3/31/2024	11.8
4/30/2024	10.6
5/31/2024	4.8
6/30/2024	2.5
7/31/2024	1.7
8/31/2024	1.6
9/30/2024	1.8
10/31/2024	2.7
11/30/2024	5.6
12/31/2024	13.1
1/31/2025	18.1
2/28/2025	18.7
3/31/2025	14.8
4/30/2025	10.2
5/31/2025	5.7
6/30/2025	3.4
7/31/2025	1.5
8/31/2025	1.6
9/30/2025	2.0
10/31/2025	2.7
11/30/2025	7.6
12/31/2025	15.1
	187.6

National Fuel Gas Distribution Corporation

Pennsylvania Division

Average Residential Bill - January 2024 - December 2025

Current Rates

	A	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA
6	**Residential Sales Service**	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Oct 25	Nov 25	Dec 25	Total
8	Customers	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	24
10	Total Usage (Mcf)	14.9	14.9	11.8	10.6	4.8	2.5	1.7	1.6	1.8	2.7	5.6	13.1	18.1	18.7	14.8	10.2	5.7	3.4	1.5	1.6	2.0	2.7	7.6	15.1	187.6
12	**Delivery Service Rates:**																									
13	Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	
14	0 - 5 Mcf	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	$2.9611	
15	Distribution Charge ($/Mcf) - Rider A	$0.3794	$0.3907	$0.3907	$0.3907	$0.3784	$0.3784	$0.3784	$0.3648	$0.3648	$0.3648	$0.3676	$0.3676	$0.3676	$0.3780	$0.3780	$0.3780	$0.3780	$0.3780	$0.3780	$0.4469	$0.4469	$0.4469	$0.4453	$0.4453	
16	Rider E - Customer Education	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	
17	Rider F - CAP Discount Charge	$0.0678	$0.0916	$0.0916	$0.0916	$0.1044	$0.1044	$0.1044	$0.1396	$0.1396	$0.1396	$0.1179	$0.1179	$0.1179	$0.1460	$0.1460	$0.1460	$0.1339	$0.1339	$0.1339	$0.1314	$0.1314	$0.1314	$0.1223	$0.1223	
18	OPEB Surcredit ($/Mcf) - Rider I	($0.2096)	($0.2096)	($0.2096)	($0.2096)	($0.2096)	($0.2096)	($0.2096)	($0.2096)	($0.2096)	($0.2218)	($0.2218)	($0.2218)	($0.2218)	($0.2218)	($0.2218)	($0.2218)	($0.2218)	($0.2218)	($0.2218)	($0.2218)	($0.2218)	($0.2124)	($0.2124)	($0.2124)	
19	TCJA Surcredit ($/Mcf)	($0.0200)	($0.0200)	($0.0200)	($0.0200)	($0.0200)	($0.0200)	($0.0200)	($0.0200)	($0.0200)	$0.1170	$0.1170	$0.1170	$0.1170	$0.1170	$0.1170	$0.1170	$0.1170	$0.1170	$0.1170	$0.1170	$0.1170	$0.0000	$0.0000	$0.0000	
20	DSIC	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.41%	0.41%	0.41%	1.01%	1.01%	1.01%	1.89%	1.89%	1.89%	3.31%	3.31%	3.31%	
22	**Delivery Service Charges:**																									
23	Basic Service Charge	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$14.00	$336.00
24	0 - 5 Mcf	$44.24	$44.11	$34.87	$31.36	$14.31	$7.47	$5.11	$4.69	$5.38	$8.05	$16.47	$38.89	$44.24	$55.24	$43.95	$30.32	$16.98	$10.14	$4.46	$4.80	$5.94	$7.94	$22.45	$44.70	$546.11
25	Distribution Charge ($/Mcf) - Rider A	$5.67	$5.82	$4.60	$4.14	$1.83	$0.95	$0.65	$0.58	$0.66	$0.99	$2.05	$4.83	$5.49	$7.05	$5.61	$3.87	$2.17	$1.29	$0.57	$0.72	$0.90	$1.20	$3.38	$6.72	$71.74
26	Rider E - Customer Education	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
27	Rider F - CAP Discount Charge	$1.01	$1.36	$1.08	$0.97	$0.50	$0.26	$0.18	$0.22	$0.25	$0.38	$0.66	$1.55	$1.76	$2.72	$2.17	$1.49	$0.77	$0.46	$0.20	$0.21	$0.26	$0.35	$0.93	$1.85	$21.59
28	OPEB Surcredit - Rider I	($3.13)	($3.12)	($2.47)	($2.22)	($1.01)	($0.53)	($0.36)	($0.33)	($0.38)	($0.60)	($1.23)	($2.91)	($3.31)	($4.14)	($3.29)	($2.27)	($1.27)	($0.76)	($0.33)	($0.36)	($0.45)	($0.57)	($1.61)	($3.21)	($39.86)
29	TCJA Surcredit	($0.30)	($0.30)	($0.24)	($0.21)	($0.10)	($0.05)	($0.03)	($0.03)	($0.04)	$0.32	$0.65	$1.54	$1.75	$2.18	$1.74	$1.20	$0.67	$0.40	$0.18	$0.19	$0.23	$0.00	$0.00	$0.00	$9.75
30	DSIC	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.07	$0.07	$0.07	$0.17	$0.17	$0.17	$0.32	$0.32	$0.32	$0.56	$0.56	$0.56	$3.37
32	**Total Delivery Service Charges**	$61.49	$61.87	$51.84	$48.04	$29.53	$22.10	$19.55	$19.13	$19.87	$23.14	$32.60	$57.90	$64.00	$77.12	$64.25	$48.78	$33.49	$25.70	$19.40	$19.88	$21.20	$23.48	$39.71	$64.62	$948.70
34	**Gas Supply Rates:**																									
35	Natural Gas Supply Charge ($/Mcf) - Rider A	$4.61	$4.19	$4.19	$4.19	$3.86	$3.86	$3.86	$4.34	$4.34	$4.34	$4.47	$4.47	$4.47	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.21	$5.21	$5.21	$5.03	$5.03	
36	Rider H - Gas Procurement Charge	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	
37	Gas Adjustment Charge ($/Mcf) - Rider A	($1.1113)	($1.1113)	($1.1113)	($1.1113)	($1.1113)	($1.1113)	($1.1113)	($0.7363)	($0.7363)	($0.7363)	($0.6413)	($0.6413)	($0.6413)	($0.6413)	($0.6413)	($0.6413)	($0.6413)	($0.6413)	($0.6413)	$0.2223	$0.2223	$0.2223	$0.2036	$0.2036	
38	Rider G - Merchant Function Charge	$0.0630	$0.0554	$0.0554	$0.0554	$0.0496	$0.0496	$0.0496	$0.0651	$0.0651	$0.0651	$0.0691	$0.0691	$0.0691	$0.0792	$0.0792	$0.0792	$0.0792	$0.0792	$0.0792	$0.0980	$0.0980	$0.0980	$0.0944	$0.0944	
40	**Gas Supply Charges:**																									
41	Natural Gas Supply Charge ($/Mcf) - Rider A	68.8375	62.3462	49.2883	44.3236	18.6605	9.7368	6.6711	6.8860	7.8943	11.8156	24.8845	58.7493	66.8295	93.9307	74.7350	51.5486	28.8787	17.2376	7.5877	8.4509	10.4645	13.9742	38.1618	75.9808	$857.87
42	Rider H - Gas Procurement Charge	1.7166	1.7116	1.3531	1.2168	0.5552	0.2897	0.1985	0.1821	0.2088	0.3125	0.6392	1.5091	1.7166	2.1436	1.7055	1.1764	0.6590	0.3934	0.1732	0.1863	0.2307	0.3080	0.8711	1.7345	$21.19
43	Gas Adjustment Charge ($/Mcf) - Rider A	(16.6028)	(16.5541)	(13.0869)	(11.7687)	(5.3695)	(2.8017)	(1.9196)	(1.1672)	(1.3381)	(2.0028)	(3.5676)	(8.4226)	(9.5810)	(11.9643)	(9.5193)	(6.5659)	(3.6784)	(2.1956)	(0.9665)	0.3604	0.4463	0.5960	1.5436	3.0734	($123.05)
44	Rider G - Merchant Function Charge	0.9419	0.8257	0.6528	0.5870	0.2397	0.1251	0.0857	0.1031	0.1182	0.1769	0.3844	0.9075	1.0323	1.4780	1.1760	0.8111	0.4544	0.2712	0.1194	0.1589	0.1967	0.2627	0.7160	1.4255	$13.25
46	**Total Gas Supply Charges**	$54.89	$48.33	$38.21	$34.36	$14.09	$7.35	$5.04	$6.00	$6.88	$10.30	$22.34	$52.74	$60.00	$85.59	$68.10	$46.97	$26.31	$15.71	$6.91	$9.16	$11.34	$15.14	$41.29	$82.21	$769.26
48	Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.17%	-0.17%	-0.17%	
49	Rider B - State Tax Adjustment	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	($0.02)	($0.03)	($0.05)	($0.06)	($0.07)	($0.06)	($0.04)	($0.03)	($0.02)	($0.02)	($0.02)	($0.02)	($0.04)	($0.07)	($0.11)	($0.66)
51	**Total Bill**	$116.38	$110.20	$90.05	$82.40	$43.62	$29.45	$24.59	$25.13	$26.75	$33.42	$54.91	$110.59	$123.94	$162.64	$132.29	$95.71	$59.77	$41.38	$26.30	$29.02	$32.52	$38.58	$80.94	$146.73	$1,717.31

	A	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA
1	National Fuel Gas Distribution Corporation																									
2	Pennsylvania Division																									
3	Average Residential Bill - January 2024 - December 2025																									
4	Proposed Rates																									
5																										
6	**Residential Sales Service**	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24	Aug 24	Sep 24	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25	Sep 25	Oct 25	Nov 25	Dec 25	Total
7																										
8	Customers	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	24
9																										
10	Total Usage	14.9	14.9	11.8	10.6	4.8	2.5	1.7	1.6	1.8	2.7	5.6	13.1	18.1	18.7	14.8	10.2	5.7	3.4	1.5	1.6	2.0	2.7	7.6	15.1	187.6
11																										
12	**Delivery Service Rates:**																									
13	Basic Service Charge	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	
14	0 - 5 Mcf	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	$3.3780	
15	Distribution Charge ($/Mcf) - Rider A	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	$0.4453	
16	Rider E - Customer Education	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	
17	Rider F - CAP Discount Charge	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	$0.1223	
18	OPEB Surcredit ($/Mcf) - Rider I	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	($0.2317)	
19	TCJA Surcredit ($/Mcf)	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	$0.0000	
20	DSIC	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
21	Energy Efficiency ($/Mcf)	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	$0.0389	
22																										
23	**Delivery Service Charges:**																									
24	Basic Service Charge	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$19.00	$456.00
25	0 - 5 Mcf	$50.47	$50.32	$39.78	$35.77	$16.32	$8.52	$5.84	$5.35	$6.14	$9.19	$18.79	$44.37	$61.27	$63.02	$50.14	$34.59	$19.38	$11.57	$5.09	$5.48	$6.78	$9.06	$25.61	$50.99	$633.84
26	Distribution Charge ($/Mcf) - Rider A	$6.65	$6.63	$5.24	$4.72	$2.15	$1.12	$0.77	$0.71	$0.81	$1.21	$2.48	$5.85	$8.08	$8.31	$6.61	$4.56	$2.55	$1.52	$0.67	$0.72	$0.89	$1.19	$3.38	$6.72	$83.54
27	Rider E - Customer Education	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
28	Rider F - CAP Discount Charge	$1.83	$1.82	$1.44	$1.30	$0.59	$0.31	$0.21	$0.19	$0.22	$0.33	$0.68	$1.61	$2.22	$2.28	$1.82	$1.25	$0.70	$0.42	$0.18	$0.20	$0.25	$0.33	$0.93	$1.85	$22.96
29	OPEB Surcredit - Rider I	($3.46)	($3.45)	($2.73)	($2.45)	($1.12)	($0.58)	($0.40)	($0.37)	($0.42)	($0.63)	($1.29)	($3.04)	($4.20)	($4.32)	($3.44)	($2.37)	($1.33)	($0.79)	($0.35)	($0.38)	($0.47)	($0.62)	($1.76)	($3.50)	($43.47)
30	TCJA Surcredit	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
31	DSIC	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
32	Energy Efficiency	$0.58	$0.58	$0.46	$0.41	$0.19	$0.10	$0.07	$0.06	$0.07	$0.11	$0.22	$0.51	$0.70	$0.72	$0.58	$0.40	$0.22	$0.13	$0.06	$0.06	$0.08	$0.10	$0.29	$0.59	$7.29
33																										
34	**Total Delivery Service Charges**	$75.07	$74.90	$63.19	$58.75	$37.13	$28.47	$25.49	$24.94	$25.82	$29.21	$39.88	$68.30	$87.07	$89.01	$74.71	$57.43	$40.52	$31.85	$24.65	$25.08	$26.53	$29.06	$47.45	$75.65	$1,160.16
35																										
36	**Gas Supply Rates:**																									
37	Natural Gas Supply Charge ($/Mcf) - Rider A	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	$5.03	
38	Rider H - Gas Procurement Charge	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	$0.1149	
39	Gas Adjustment Charge ($/Mcf) - Rider A	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	$0.2036	
40	Rider G - Merchant Function Charge	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	$0.0952	
41																										
42	**Gas Supply Charges:**																									
43	Natural Gas Supply Charge ($/Mcf) - Rider A	75.1989	74.9781	59.2746	53.3039	24.3199	12.6897	8.6944	7.9790	9.1474	13.6911	28.0009	66.1067	91.2951	93.9046	74.7142	51.5343	28.8706	17.2328	7.5856	8.1604	10.1047	13.4938	38.1618	75.9808	944.42
44	Rider H - Gas Procurement Charge	1.7166	1.7116	1.3531	1.2168	0.5552	0.2897	0.1985	0.1821	0.2088	0.3125	0.6392	1.5091	2.0840	2.1436	1.7055	1.1764	0.6590	0.3934	0.1732	0.1863	0.2307	0.3080	0.8711	1.7345	21.56
45	Gas Adjustment Charge ($/Mcf) - Rider A	3.0418	3.0329	2.3976	2.1561	0.9837	0.5133	0.3517	0.3227	0.3700	0.5538	1.1326	2.6740	3.6929	3.7984	3.0222	2.0846	1.1678	0.6971	0.3068	0.3301	0.4087	0.5458	1.5436	3.0734	38.20
46	Rider G - Merchant Function Charge	1.4222	1.4180	1.1210	1.0081	0.4599	0.2400	0.1644	0.1509	0.1730	0.2589	0.5296	1.2502	1.7266	1.7759	1.4130	0.9746	0.5460	0.3259	0.1435	0.1543	0.1911	0.2552	0.7217	1.4370	17.86
47																										
48	**Total Gas Supply Charges**	$81.38	$81.14	$64.15	$57.68	$26.32	$13.73	$9.41	$8.63	$9.90	$14.82	$30.30	$71.54	$98.80	$101.62	$80.85	$55.77	$31.24	$18.65	$8.21	$8.83	$10.94	$14.60	$41.30	$82.23	$1,022.05
49																										
50	Rider B - State Tax Adjustment %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
51	Rider B - State Tax Adjustment	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00
52																										
53	**Total Bill**	$156.45	$156.04	$127.34	$116.43	$63.45	$42.20	$34.90	$33.57	$35.72	$44.03	$70.18	$139.84	$185.87	$190.63	$155.56	$113.20	$71.76	$50.50	$32.86	$33.91	$37.47	$43.66	$88.75	$157.88	$2,182.21
54																										

1	2	3	4	5	6	7	8	9	10
		Tariff Page	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24	Jul 24
RES_BSC	Residential Basic charge	36	14.0000	14.0000	14.0000	14.0000	14.0000	14.0000	14.0000
	Tariff Rate	36	3.3405	3.3518	3.3518	3.3518	3.3395	3.3395	3.3395
RES_B1	Net Delivery Rate		2.9611	2.9611	2.9611	2.9611	2.9611	2.9611	2.9611
	Riders								
RIDER_A	Rider A - Distribution Charge	147	0.37943	0.39070	0.39070	0.39070	0.37840	0.37840	0.37840
NGS	Rider A - Natural Gas Supply Charge	147	4.6076	4.1854	4.1854	4.1854	3.8621	3.8621	3.8621
GAC	Rider A - Gas Adjustment Charge	147	(1.11130)	(1.11130)	(1.11130)	(1.11130)	(1.11130)	(1.11130)	(1.11130)
RIDER_B	Rider B State Tax Adjustment Surchar	157	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
RIDER_DSIC	DSIC	172	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
RIDER_E	Rider E Customer Education Charge	162	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
RIDER_F	Rider F CAP Discount Charge	164	0.06780	0.09160	0.09160	0.09160	0.10440	0.10440	0.10440
	Rider G - Residential Factor	168	1.80%						
RIDER_G_RES	Rider G - Residential		0.0630	0.0554	0.0554	0.0554	0.0496	0.0496	0.0496
RIDER_H	Rider H - Res Gas Procurement Charg	169	0.1149	0.1149	0.1149	0.1149	0.1149	0.1149	0.1149
TCJA_RES_SA	TCJA	170	(0.0200)	(0.0200)	(0.0200)	(0.0200)	(0.0200)	(0.0200)	(0.0200)
OPEB_RES_SA	Rider I - OPEB	171	(0.2096)	(0.2096)	(0.2096)	(0.2096)	(0.2096)	(0.2096)	(0.2096)

1	2	3	11	12	13	14	15	16	17
		Tariff Page	Aug 24	Sep 24	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25
RES_BSC	Residential Basic charge	36	14.0000	14.0000	14.0000	14.0000	14.0000	14.0000	14.0000
	Tariff Rate	36	3.3259	3.3259	3.3259	3.3287	3.3287	3.3287	3.3391
RES_B1	Net Delivery Rate		2.9611	2.9611	2.9611	2.9611	2.9611	2.9611	2.9611
	Riders								
RIDER_A	Rider A - Distribution Charge	147	0.36480	0.36480	0.36480	0.36764	0.36764	0.3676	0.3780
NGS	Rider A - Natural Gas Supply Charge	147	4.3439	4.3439	4.3439	4.4732	4.4732	4.4732	5.0348
GAC	Rider A - Gas Adjustment Charge	147	(0.73630)	(0.73630)	(0.73630)	(0.64130)	(0.64130)	(0.6413)	(0.6413)
RIDER_B	Rider B State Tax Adjustment Surchar	157	0.00%	0.00%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
RIDER_DSIC	DSIC	172	0.00%	0.00%	0.00%	0.00%	0.00%	0.41%	0.41%
RIDER_E	Rider E Customer Education Charge	162	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
RIDER_F	Rider F CAP Discount Charge	164	0.13960	0.13960	0.13960	0.11790	0.11790	0.11790	0.1460
	Rider G - Residential Factor	168						1.80%	
RIDER_G_RES	Rider G - Residential		0.0651	0.0651	0.0651	0.0691	0.0691	0.0691	0.0792
RIDER_H	Rider H - Res Gas Procurement Charg	169	0.1149	0.1149	0.1149	0.1149	0.1149	0.1149	0.1149
TCJA_RES_SA	TCJA	170	(0.0200)	(0.0200)	0.1170	0.1170	0.1170	0.1170	0.1170
OPEB_RES_S/	Rider I - OPEB	171	(0.2096)	(0.2096)	(0.2218)	(0.2218)	(0.2218)	(0.2218)	(0.2218)

1	2	3	18	19	20	21	22
		Tariff Page	Mar 25	Apr 25	May 25	Jun 25	Jul 25
RES_BSC	Residential Basic charge	36	14.0000	14.0000	14.0000	14.0000	14.0000
	Tariff Rate	36	3.3391	3.3391	3.3391	3.3391	3.3391
RES_B1	Net Delivery Rate		2.9611	2.9611	2.9611	2.9611	2.9611
	Riders						
RIDER_A	Rider A - Distribution Charge	147	0.3780	0.3780	0.3780	0.3780	0.3780
NGS	Rider A - Natural Gas Supply Charge	147	5.0348	5.0348	5.0348	5.0348	5.0348
GAC	Rider A - Gas Adjustment Charge	147	(0.6413)	(0.6413)	(0.6413)	(0.6413)	(0.6413)
RIDER_B	Rider B State Tax Adjustment Surchar	157	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%
RIDER_DSIC	DSIC	172	0.41%	1.01%	1.01%	1.01%	1.89%
RIDER_E	Rider E Customer Education Charge	162	0.0000	0.0000	0.0000	0.0000	0.0000
RIDER_F	Rider F CAP Discount Charge	164	0.1460	0.1460	0.1339	0.1339	0.1339
	Rider G - Residential Factor	168					
RIDER_G_RES	Rider G - Residential		0.0792	0.0792	0.0792	0.0792	0.0792
RIDER_H	Rider H - Res Gas Procurement Charg	169	0.1149	0.1149	0.1149	0.1149	0.1149
TCJA_RES_SA	TCJA	170	0.1170	0.1170	0.1170	0.1170	0.1170
OPEB_RES_SA	Rider I - OPEB	171	(0.2218)	(0.2218)	(0.2218)	(0.2218)	(0.2218)

1	2	3	23	24	25	26	27
		Tariff Page	Aug 25	Sep 25	Oct 25	Nov 25	Dec 25
RES_BSC	Residential Basic charge	36	14.0000	14.0000	14.0000	14.0000	14.0000
	Tariff Rate	36	3.4080	3.4080	3.4080	3.4064	3.4064
RES_B1	Net Delivery Rate		2.9611	2.9611	2.9611	2.9611	2.9611
	Riders						
RIDER_A	Rider A - Distribution Charge	147	0.4469	0.4469	0.4469	0.4453	0.4453
NGS	Rider A - Natural Gas Supply Charge	147	5.2126	5.2126	5.2126	5.0334	5.0334
GAC	Rider A - Gas Adjustment Charge	147	0.2223	0.2223	0.2223	0.2036	0.2036
RIDER_B	Rider B State Tax Adjustment Surchar	157	-0.09%	-0.09%	-0.17%	-0.17%	-0.17%
RIDER_DSIC	DSIC	172	1.89%	1.89%	3.31%	3.31%	3.31%
RIDER_E	Rider E Customer Education Charge	162	0.0000	0.0000	0.0000	0.0000	0.0000
RIDER_F	Rider F CAP Discount Charge	164	0.1314	0.1314	0.1314	0.1223	0.1223
	Rider G - Residential Factor	168					
RIDER_G_RES	Rider G - Residential		0.0980	0.0980	0.0980	0.0944	0.0944
RIDER_H	Rider H - Res Gas Procurement Charg	169	0.1149	0.1149	0.1149	0.1149	0.1149
TCJA_RES_SA	TCJA	170	0.1170	0.1170	0.0000	0.0000	0.0000
OPEB_RES_SA	Rider I - OPEB	171	(0.2218)	(0.2218)	(0.2124)	(0.2124)	(0.2124)

1	2	3	4	5	6	7	8	9
		Tariff Page	Jan 24	Feb 24	Mar 24	Apr 24	May 24	Jun 24
RES_BSC	Residential Basic charge	36	19.0000	19.0000	19.0000	19.0000	19.0000	19.0000
	Tariff Rate	36	3.8233	3.8233	3.8233	3.8233	3.8233	3.8233
RES_B1	Net Delivery Rate		3.3780	3.3780	3.3780	3.3780	3.3780	3.3780
	Riders							
RIDER_A	Rider A - Distribution Charge	147	0.4453	0.4453	0.4453	0.4453	0.4453	0.4453
NGS	Rider A - Natural Gas Supply C	147	5.0334	5.0334	5.0334	5.0334	5.0334	5.0334
GAC	Rider A - Gas Adjustment Cha	147	0.2036	0.2036	0.2036	0.2036	0.2036	0.2036
RIDER_B	Rider B State Tax Adjustment	157	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
RIDER_DSI	DSIC	172	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
RIDER_E	Rider E Customer Education C	162	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
RIDER_F	Rider F CAP Discount Charge	164	0.1223	0.1223	0.1223	0.1223	0.1223	0.1223
	Rider G - Residential Factor	168	1.82%					
RIDER_G_F	Rider G - Residential		0.0952	0.0952	0.0952	0.0952	0.0952	0.0952
RIDER_H	Rider H - Res Gas Procureme	169	0.1149	0.1149	0.1149	0.1149	0.1149	0.1149
RIDER_EE	Rider E - Energy Efficiency		0.0389	0.0389	0.0389	0.0389	0.0389	0.0389
TCJA_RES_	TCJA	170	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
OPEB_RES	Rider I - OPEB	171	(0.2317)	(0.2317)	(0.2317)	(0.2317)	(0.2317)	(0.2317)

1	2	3	10	11	12	13	14	15
		Tariff Page	Jul 24	Aug 24	Sep 24	Oct 24	Nov 24	Dec 24
RES_BSC	Residential Basic charge	36	19.0000	19.0000	19.0000	19.0000	19.0000	19.0000
	Tariff Rate	36	3.8233	3.8233	3.8233	3.8233	3.8233	3.8233
RES_B1	Net Delivery Rate		3.3780	3.3780	3.3780	3.3780	3.3780	3.3780
	Riders							
RIDER_A	Rider A - Distribution Charge	147	0.4453	0.4453	0.4453	0.4453	0.4453	0.4453
NGS	Rider A - Natural Gas Supply C	147	5.0334	5.0334	5.0334	5.0334	5.0334	5.0334
GAC	Rider A - Gas Adjustment Cha	147	0.2036	0.2036	0.2036	0.2036	0.2036	0.2036
RIDER_B	Rider B State Tax Adjustment	157	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
RIDER_DSI	DSIC	172	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
RIDER_E	Rider E Customer Education C	162	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
RIDER_F	Rider F CAP Discount Charge	164	0.1223	0.1223	0.1223	0.1223	0.1223	0.1223
	Rider G - Residential Factor	168						
RIDER_G_F	Rider G - Residential		0.0952	0.0952	0.0952	0.0952	0.0952	0.0952
RIDER_H	Rider H - Res Gas Procureme	169	0.1149	0.1149	0.1149	0.1149	0.1149	0.1149
RIDER_EE	Rider E - Energy Efficiency		0.0389	0.0389	0.0389	0.0389	0.0389	0.0389
TCJA_RES_	TCJA	170	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
OPEB_RES	Rider I - OPEB	171	(0.2317)	(0.2317)	(0.2317)	(0.2317)	(0.2317)	(0.2317)

1	2	3	16	17	18	19	20	21	22	23
		Tariff Page	Jan 25	Feb 25	Mar 25	Apr 25	May 25	Jun 25	Jul 25	Aug 25
RES_BSC	Residential Basic charge	36	19.0000	19.0000	19.0000	19.0000	19.0000	19.0000	19.0000	19.0000
	Tariff Rate	36	3.8233	3.8233	3.8233	3.8233	3.8233	3.8233	3.8233	3.8233
RES_B1	Net Delivery Rate		3.3780	3.3780	3.3780	3.3780	3.3780	3.3780	3.3780	3.3780
	Riders									
RIDER_A	Rider A - Distribution Charge	147	0.4453	0.4453	0.4453	0.4453	0.4453	0.4453	0.4453	0.4453
NGS	Rider A - Natural Gas Supply C	147	5.0334	5.0334	5.0334	5.0334	5.0334	5.0334	5.0334	5.0334
GAC	Rider A - Gas Adjustment Cha	147	0.2036	0.2036	0.2036	0.2036	0.2036	0.2036	0.2036	0.2036
RIDER_B	Rider B State Tax Adjustment	157	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
RIDER_DSI	DSIC	172	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
RIDER_E	Rider E Customer Education C	162	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
RIDER_F	Rider F CAP Discount Charge	164	0.1223	0.1223	0.1223	0.1223	0.1223	0.1223	0.1223	0.1223
	Rider G - Residential Factor	168								
RIDER_G_F	Rider G - Residential		0.0952	0.0952	0.0952	0.0952	0.0952	0.0952	0.0952	0.0952
RIDER_H	Rider H - Res Gas Procureme	169	0.1149	0.1149	0.1149	0.1149	0.1149	0.1149	0.1149	0.1149
RIDER_EE	Rider E - Energy Efficiency		0.0389	0.0389	0.0389	0.0389	0.0389	0.0389	0.0389	0.0389
TCJA_RES_	TCJA	170	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
OPEB_RES	Rider I - OPEB	171	(0.2317)	(0.2317)	(0.2317)	(0.2317)	(0.2317)	(0.2317)	(0.2317)	(0.2317)

1	2	3	24	25	26	27
		Tariff Page	Sep 25	Oct 25	Nov 25	Dec 25
RES_BSC	Residential Basic charge	36	19.0000	19.0000	19.0000	19.0000
	Tariff Rate	36	3.8233	3.8233	3.8233	3.8233
RES_B1	Net Delivery Rate		3.3780	3.3780	3.3780	3.3780
	Riders					
RIDER_A	Rider A - Distribution Charge	147	0.4453	0.4453	0.4453	0.4453
NGS	Rider A - Natural Gas Supply C	147	5.0334	5.0334	5.0334	5.0334
GAC	Rider A - Gas Adjustment Cha	147	0.2036	0.2036	0.2036	0.2036
RIDER_B	Rider B State Tax Adjustment	157	0.00%	0.00%	0.00%	0.00%
RIDER_DSI	DSIC	172	0.00%	0.00%	0.00%	0.00%
RIDER_E	Rider E Customer Education C	162	0.0000	0.0000	0.0000	0.0000
RIDER_F	Rider F CAP Discount Charge	164	0.1223	0.1223	0.1223	0.1223
	Rider G - Residential Factor	168				
RIDER_G_F	Rider G - Residential		0.0952	0.0952	0.0952	0.0952
RIDER_H	Rider H - Res Gas Procureme	169	0.1149	0.1149	0.1149	0.1149
RIDER_EE	Rider E - Energy Efficiency		0.0389	0.0389	0.0389	0.0389
TCJA_RES_	TCJA	170	0.0000	0.0000	0.0000	0.0000
OPEB_RES	Rider I - OPEB	171	(0.2317)	(0.2317)	(0.2317)	(0.2317)

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please provide a detailed written description of how the Company confirms a customer's income-eligibility for cold weather shutoff protections, including a detailed list of the information accepted to confirm the customer's income-eligibility.

Response

The Company will accept verbal confirmation of the household makeup and income to confirm income-eligibility for cold weather protections. Low-income status is also confirmed for LIHEAP recipients. In rare cases the Company requires proof of income. See response in OCA IV-18 for a detailed list of information accepted.

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please provide the WNA revenues for each month since the inception of the mechanism, showing WNA charges and credits separately by customer class. Provide all workpapers and source documents supporting the Company's response in electronic form with all spreadsheet links and formulas intact and all source data used. To the extent the information requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

Response

Please see attachment OCA IX-38.xlsx for WNA revenue.

OCA IX-38

Weather Normalization Adjustment Revenues

	10/23	11/23	12/23	1/24	2/24	3/24
Residential Sales	93,727.43	146,624.59	257,001.35	810,500.36	999,259.52	1,894,779.27
Commercial Sales	6,410.84	11,879.85	20,891.07	75,536.01	92,149.57	179,651.91
Industrial Sales	3.15			6.21	3.94	13.65
Public Authority Sal	320.52	926.17	1,667.56	3,742.03	5,631.73	9,820.27
Residential Transportation Rev	9,054.41	14,509.10	24,959.87	81,104.49	97,524.35	188,199.75
Commercial Transportation Rev	2,907.81	5,062.57	8,817.60	34,603.90	38,467.79	79,630.73
Public Authority Trans Rev	333.96	869.50	1,282.98	4,527.08	4,956.23	9,765.18
Total	**112,758.12**	**179,871.78**	**314,620.43**	**1,010,020.08**	**1,237,993.13**	**2,361,860.76**

OCA IX-38

Weather Normalization Adjustment Revenues

	4/24	5/24	6/24	7/24	8/24	9/24	10/24
Residential Sales	565,460.95	877,192.60	(38,641.37)	(7,760.98)	(5,773.66)	(2,885.65)	283,993.47
Commercial Sales	49,172.46	72,122.52	(11,664.12)	(618.72)	(586.18)	(113.01)	21,172.23
Industrial Sales	3.41	8.21					3.26
Public Authority Sal	3,094.31	4,400.22	(720.55)	(62.72)	(3.59)		1,211.60
Residential Transportation Rev	57,709.81	88,457.91	(3,182.30)	(853.99)	(306.60)	(317.97)	29,949.91
Commercial Transportation Rev	23,238.47	32,575.21	(3,613.09)	(189.91)	(307.22)	(26.37)	9,874.87
Public Authority Trans Rev	3,511.32	4,215.72	(478.98)	(32.43)	55.91	(10.30)	1,109.82
Total	**702,190.73**	**1,078,972.39**	**(58,300.41)**	**(9,518.75)**	**(6,921.34)**	**(3,353.30)**	**347,315.16**

OCA IX-38

Weather Normalization Adjustment Revenues

	11/24	12/24	01/25	02/25	03/25	04/25
Residential Sales	856,505.54	84,939.34	(193,447.50)	(242,178.20)	461,988.19	477,630.65
Commercial Sales	67,182.86	6,479.70	(17,152.00)	(25,872.24)	46,610.47	49,000.82
Industrial Sales	6.63	(8.25)	(20.54)	(3.74)	60.59	14.19
Public Authority Sal	4,363.60	317.79	(1,278.67)	(1,321.68)	3,285.17	2,453.24
Residential Transportation Rev	89,936.41	11,831.62	(20,171.77)	(27,719.55)	49,117.26	54,761.74
Commercial Transportation Rev	29,355.31	5,159.27	(7,371.75)	(11,356.20)	17,581.35	21,167.26
Public Authority Trans Rev	3,744.79	1,127.00	(910.60)	(1,761.82)	2,267.03	3,167.95
Total	**1,051,095.14**	**109,846.47**	**(240,352.83)**	**(310,213.43)**	**580,910.06**	**608,195.85**

OCA IX-38

Weather Normalization Adjustment Revenues

	05/25	06/25	07/25	08/25	09/25	10/25	11/25
Residential Sales	38,598.31	(2,474.18)	(358.54)	(1,374.75)	(893.39)	234,653.39	(240,017.88)
Commercial Sales	3,010.47	(1,265.16)	(22.43)	180.36	(126.24)	18,869.90	(21,500.54)
Industrial Sales	(5.92)			5.92		13.80	(18.66)
Public Authority Sal	(80.41)	(43.90)	28.77	8.79	(7.38)	1,075.19	(1,351.02)
Residential Transportation Rev	5,112.01	(883.02)	(116.55)	(198.91)	(87.57)	27,037.16	(25,839.25)
Commercial Transportation Rev	1,692.02	(717.02)	25.07	(16.39)	(38.76)	8,625.57	(8,497.17)
Public Authority Trans Rev	178.82	(167.36)	30.09	(5.14)	(2.56)	886.89	(990.07)
Total	**48,505.30**	**(5,550.64)**	**(413.59)**	**(1,400.12)**	**(1,155.90)**	**291,161.90**	**(298,214.59)**

OCA IX-38

Weather Normalization Adjustment Revenues

	12/25	01/26	02/26	Grand Total
Residential Sales	(957,751.07)	(366,673.97)	(1,579,618.86)	4,443,004.96
Commercial Sales	(89,375.68)	(36,125.85)	(171,615.79)	344,283.08
Industrial Sales	2.41		(28.26)	60.00
Public Authority Sal	(5,354.93)	(2,529.22)	(8,314.15)	21,278.74
Residential Transportation Rev	(105,374.88)	(40,543.35)	(180,920.37)	422,749.72
Commercial Transportation Rev	(35,806.81)	(15,709.58)	(67,124.49)	168,010.04
Public Authority Trans Rev	(4,623.52)	(2,750.25)	(8,268.91)	22,028.33
Total	**(1,198,284.48)**	**(464,332.22)**	**(2,015,890.83)**	**5,421,414.87**

CAUSE-PA Statement 1, Geller
Appendix C

Exhibit Geller C-1

Energy Assistance Summary 8/23/25 – 4/9/26

Exhibit Geller C-2

52 Pa. Code Section 69.3302 Factors

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 01

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	455	$114,562	34	$252
	Renter	639	$159,626	48	$250
	RenterWithHeat	6	$2,054	0	$342
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	217	$57,931	16	$267
	Roomer	0	$0	0	$0
	Other	16	$4,385	1	$274
RACE	AmericanIndian	3	$615	0	$205
	Other	81	$21,667	6	$267
	NativeHawaiian	3	$785	0	$262
	Black	65	$16,825	5	$259
	White	1,149	$291,042	86	$253
	Asian	5	$1,315	0	$263
	Unknown	27	$6,309	2	$234
DISABLED	YES	324	$70,894	24	$219
	NO	1,009	$267,664	76	$265
AGE 60 & ABV	YES	641	$143,074	48	$223
	NO	692	$195,484	52	$282
AGE 5 & BLW	YES	212	$56,130	16	$265
	NO	1,121	$282,428	84	$252
PAY_TYPE	DIRECT	19	$4,980	1	$262
	PROVIDER	1,321	$334,636	99	$253
REFUNDS		29	$3,597		$124

AVERAGE HOUSEHOLD SIZE: 2.89

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	719	$185,801	54	$258
	FuelOil	196	$49,521	15	$253
	Coal	2	$400	0	$200
	NaturalGas	248	$59,544	19	$240
	Kerosene	6	$1,200	0	$200
	Propane	160	$41,692	12	$261
	WoodOrOther	2	$400	0	$200
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	28	$27,428	2	$980
	1000 - 1999	7	$7,000	1	$1,000
	2000 - 2999	8	$7,855	1	$982
	3000 - 3999	8	$6,294	1	$787
	4000 - 4999	13	$9,081	1	$699
	5000 - 5999	8	$4,463	1	$558
	6000 - 6999	10	$5,431	1	$543
	7000 - 7999	12	$5,270	1	$439
	8000 - 8999	20	$7,671	2	$384
	9000 - 9999	22	$7,232	2	$329
	10000 - 10999	28	$8,292	2	$296
	11000 - 11999	74	$19,309	6	$261
	12000 - 12999	118	$26,789	9	$227
	13000 - 13999	77	$16,267	6	$211
	14000 - 14999	58	$11,776	4	$203
	15000 - 15999	72	$14,400	5	$200
	16000 - 16999	61	$12,200	5	$200
	17000 - 17999	66	$13,200	5	$200
	18000 - 18999	73	$14,600	5	$200
	19000 - 19999	70	$14,000	5	$200
	> 19999	500	$100,000	38	$200
PAYMENT TYPE	Regular	1,333	$338,558		$254
	Reissue	2	$400		$200
	Secondpay	5	$658		$132
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,340	$339,616		$253
RECOUPMENTS		0	$0		$0
NET PAID			$339,616		
PMT SUB TYPE	APD	0	$0		$0
	STD	1,340	$339,616		$253

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 02

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	7,173	$2,009,067	33	$280
	Renter	9,521	$3,021,155	43	$317
	RenterWithHeat	232	$71,111	1	$307
	SubsidizedWithHeat	12	$3,319	0	$277
	SubsidizedNoHeat	4,784	$1,689,537	22	$353
	Roomer	5	$1,324	0	$265
	Other	208	$82,784	1	$398
RACE	AmericanIndian	117	$44,885	1	$384
	Other	638	$220,361	3	$345
	NativeHawaiian	21	$10,206	0	$486
	Black	9,154	$3,041,064	42	$332
	White	11,315	$3,341,845	52	$295
	Asian	252	$84,305	1	$335
	Unknown	438	$135,631	2	$310
DISABLED	YES	5,443	$1,224,528	25	$225
	NO	16,492	$5,653,769	75	$343
AGE 60 & ABV	YES	9,332	$2,185,780	43	$234
	NO	12,603	$4,692,517	57	$372
AGE 5 & BLW	YES	3,445	$1,235,463	16	$359
	NO	18,490	$5,642,834	84	$305
PAY_TYPE	DIRECT	125	$42,410	1	$339
	PROVIDER	21,866	$6,852,605	99	$313
REFUNDS		466	$102,291		$220

AVERAGE HOUSEHOLD SIZE: 2.84

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	7,769	$2,610,081	35	$336
	FuelOil	230	$73,347	1	$319
	Coal	0	$0	0	$0
	NaturalGas	13,876	$4,177,886	63	$301
	Kerosene	16	$5,176	0	$324
	Propane	43	$11,581	0	$269
	WoodOrOther	0	$0	0	$0
	BlendedFuel	1	$226	0	$226
INCOME RANGE	0 - 999	1,507	$1,507,000	7	$1,000
	1000 - 1999	294	$294,000	1	$1,000
	2000 - 2999	266	$259,326	1	$975
	3000 - 3999	302	$236,110	1	$782
	4000 - 4999	283	$197,891	1	$699
	5000 - 5999	265	$148,577	1	$561
	6000 - 6999	299	$145,531	1	$487
	7000 - 7999	338	$144,184	2	$427
	8000 - 8999	342	$126,881	2	$371
	9000 - 9999	359	$116,154	2	$324
	10000 - 10999	536	$151,031	2	$282
	11000 - 11999	2,063	$505,207	9	$245
	12000 - 12999	2,195	$468,864	10	$214
	13000 - 13999	941	$188,504	4	$200
	14000 - 14999	996	$199,237	5	$200
	15000 - 15999	976	$195,200	4	$200
	16000 - 16999	940	$188,000	4	$200
	17000 - 17999	933	$186,600	4	$200
	18000 - 18999	972	$194,400	4	$200
	19000 - 19999	926	$185,200	4	$200
	> 19999	6,202	$1,240,400	28	$200
PAYMENT TYPE	Regular	21,935	$6,878,297		$314
	Reissue	5	$1,381		$276
	Secondpay	45	$13,413		$298
	Underpay	5	$1,724		$345
	Extraordinary	1	$200		$200
TOTAL PMT		21,991	$6,895,015		$314
RECOUPMENTS		4	$715		$179
NET PAID			$6,894,300		
PMT SUB TYPE	APD	0	$0		$0
	STD	21,991	$6,895,015		$314

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 03

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	915	$247,817	50	$271
	Renter	722	$214,692	40	$297
	RenterWithHeat	22	$4,900	1	$223
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	126	$41,810	7	$332
	Roomer	1	$200	0	$200
	Other	41	$16,759	2	$409
RACE	AmericanIndian	2	$400	0	$200
	Other	23	$8,210	1	$357
	NativeHawaiian	1	$200	0	$200
	Black	28	$7,801	2	$279
	White	1,760	$506,594	96	$288
	Asian	2	$773	0	$386
	Unknown	11	$2,200	1	$200
DISABLED	YES	568	$125,935	31	$222
	NO	1,259	$400,243	69	$318
AGE 60 & ABV	YES	911	$207,918	50	$228
	NO	916	$318,260	50	$347
AGE 5 & BLW	YES	207	$63,609	11	$307
	NO	1,620	$462,569	89	$286
PAY_TYPE	DIRECT	43	$13,172	2	$306
	PROVIDER	1,794	$516,000	98	$288
REFUNDS		17	$3,814		$224

AVERAGE HOUSEHOLD SIZE: 2.88

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	520	$165,314	28	$318
	FuelOil	184	$51,246	10	$279
	Coal	4	$1,376	0	$344
	NaturalGas	969	$264,397	53	$273
	Kerosene	24	$6,400	1	$267
	Propane	114	$33,943	6	$298
	WoodOrOther	9	$2,102	0	$234
	BlendedFuel	3	$1,400	0	$467
INCOME RANGE	0 - 999	111	$110,776	6	$998
	1000 - 1999	8	$8,000	0	$1,000
	2000 - 2999	10	$10,000	1	$1,000
	3000 - 3999	14	$11,664	1	$833
	4000 - 4999	16	$11,886	1	$743
	5000 - 5999	10	$5,935	1	$594
	6000 - 6999	21	$10,861	1	$517
	7000 - 7999	13	$5,825	1	$448
	8000 - 8999	21	$8,432	1	$402
	9000 - 9999	20	$6,809	1	$340
	10000 - 10999	33	$10,240	2	$310
	11000 - 11999	160	$42,051	9	$263
	12000 - 12999	189	$43,177	10	$228
	13000 - 13999	75	$15,183	4	$202
	14000 - 14999	74	$14,915	4	$202
	15000 - 15999	70	$14,024	4	$200
	16000 - 16999	87	$17,400	5	$200
	17000 - 17999	76	$15,200	4	$200
	18000 - 18999	100	$20,000	5	$200
	19000 - 19999	79	$15,800	4	$200
	> 19999	640	$128,000	35	$200
PAYMENT TYPE	Regular	1,827	$526,178		$288
	Reissue	0	$0		$0
	Secondpay	10	$2,994		$299
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,837	$529,172		$288
RECOUPMENTS		5	$2,107		$421
NET PAID			$527,065		
PMT SUB TYPE	APD	0	$0		$0
	STD	1,837	$529,172		$288

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 04

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,623	$461,187	41	$284
	Renter	1,821	$572,962	46	$315
	RenterWithHeat	47	$16,307	1	$347
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	398	$137,791	10	$346
	Roomer	3	$772	0	$257
	Other	67	$23,750	2	$354
RACE	AmericanIndian	16	$5,794	0	$362
	Other	94	$30,215	2	$321
	NativeHawaiian	8	$2,459	0	$307
	Black	720	$232,209	18	$323
	White	3,055	$922,365	77	$302
	Asian	12	$3,283	0	$274
	Unknown	54	$16,444	1	$305
DISABLED	YES	1,044	$235,767	26	$226
	NO	2,915	$977,002	74	$335
AGE 60 & ABV	YES	1,770	$417,579	45	$236
	NO	2,189	$795,190	55	$363
AGE 5 & BLW	YES	547	$182,925	14	$334
	NO	3,412	$1,029,844	86	$302
PAY_TYPE	DIRECT	31	$10,818	1	$349
	PROVIDER	3,943	$1,206,485	99	$306
REFUNDS		122	$24,409		$200

AVERAGE HOUSEHOLD SIZE: 2.84

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	1,480	$469,777	37	$317
	FuelOil	339	$108,510	9	$320
	Coal	0	$0	0	$0
	NaturalGas	1,979	$589,529	50	$298
	Kerosene	24	$8,021	1	$334
	Propane	117	$31,227	3	$267
	WoodOrOther	3	$762	0	$254
	BlendedFuel	17	$4,943	0	$291
INCOME RANGE	0 - 999	281	$281,000	7	$1,000
	1000 - 1999	38	$38,000	1	$1,000
	2000 - 2999	40	$40,000	1	$1,000
	3000 - 3999	24	$20,254	1	$844
	4000 - 4999	31	$23,279	1	$751
	5000 - 5999	34	$20,436	1	$601
	6000 - 6999	45	$23,389	1	$520
	7000 - 7999	38	$18,257	1	$480
	8000 - 8999	60	$24,038	2	$401
	9000 - 9999	48	$16,457	1	$343
	10000 - 10999	81	$25,002	2	$309
	11000 - 11999	321	$86,292	8	$269
	12000 - 12999	328	$76,471	8	$233
	13000 - 13999	152	$31,691	4	$208
	14000 - 14999	182	$36,999	5	$203
	15000 - 15999	161	$32,204	4	$200
	16000 - 16999	214	$42,800	5	$200
	17000 - 17999	173	$34,600	4	$200
	18000 - 18999	195	$39,000	5	$200
	19000 - 19999	213	$42,600	5	$200
	> 19999	1,300	$260,000	33	$200
PAYMENT TYPE	Regular	3,959	$1,212,769		$306
	Reissue	1	$257		$257
	Secondpay	11	$4,012		$365
	Underpay	2	$165		$82
	Extraordinary	1	$100		$100
TOTAL PMT		3,974	$1,217,303		$306
RECOUPMENTS		0	$0		$0
NET PAID			$1,217,303		
PMT SUB TYPE	APD	0	$0		$0
	STD	3,974	$1,217,303		$306

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 05

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	979	$258,921	49	$264
	Renter	781	$233,839	39	$299
	RenterWithHeat	6	$1,233	0	$206
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	148	$42,853	7	$290
	Roomer	0	$0	0	$0
	Other	69	$22,867	3	$331
RACE	AmericanIndian	5	$1,048	0	$210
	Other	24	$5,930	1	$247
	NativeHawaiian	0	$0	0	$0
	Black	19	$5,715	1	$301
	White	1,916	$543,116	97	$283
	Asian	2	$433	0	$216
	Unknown	17	$3,471	1	$204
DISABLED	YES	524	$118,345	26	$226
	NO	1,459	$441,368	74	$303
AGE 60 & ABV	YES	1,075	$253,605	54	$236
	NO	908	$306,108	46	$337
AGE 5 & BLW	YES	265	$81,071	13	$306
	NO	1,718	$478,642	87	$279
PAY_TYPE	DIRECT	10	$2,033	0	$203
	PROVIDER	1,992	$561,006	100	$282
REFUNDS		25	$4,676		$187

AVERAGE HOUSEHOLD SIZE: 3.16

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	483	$143,174	24	$296
	FuelOil	1,231	$337,728	62	$274
	Coal	24	$4,925	1	$205
	NaturalGas	23	$7,205	1	$313
	Kerosene	54	$16,052	3	$297
	Propane	112	$35,171	6	$314
	WoodOrOther	48	$13,372	2	$279
	BlendedFuel	8	$2,086	0	$261
INCOME RANGE	0 - 999	92	$92,000	5	$1,000
	1000 - 1999	13	$13,000	1	$1,000
	2000 - 2999	13	$13,000	1	$1,000
	3000 - 3999	19	$16,240	1	$855
	4000 - 4999	13	$9,740	1	$749
	5000 - 5999	15	$9,115	1	$608
	6000 - 6999	29	$15,429	1	$532
	7000 - 7999	17	$7,679	1	$452
	8000 - 8999	24	$9,699	1	$404
	9000 - 9999	30	$10,504	2	$350
	10000 - 10999	43	$13,073	2	$304
	11000 - 11999	159	$42,073	8	$265
	12000 - 12999	150	$34,622	8	$231
	13000 - 13999	84	$17,139	4	$204
	14000 - 14999	97	$19,400	5	$200
	15000 - 15999	98	$19,600	5	$200
	16000 - 16999	88	$17,600	4	$200
	17000 - 17999	103	$20,600	5	$200
	18000 - 18999	109	$21,800	5	$200
	19000 - 19999	87	$17,400	4	$200
	> 19999	700	$140,000	35	$200
PAYMENT TYPE	Regular	1,983	$559,713		$282
	Reissue	0	$0		$0
	Secondpay	15	$2,987		$199
	Underpay	4	$339		$85
	Extraordinary	0	$0		$0
TOTAL PMT		2,002	$563,039		$281
RECOUPMENTS		19	$2,389		$126
NET PAID			$560,650		
PMT SUB TYPE	APD	0	$0		$0
	STD	2,002	$563,039		$281

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 06

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,784	$466,668	37	$262
	Renter	2,574	$685,512	53	$266
	RenterWithHeat	63	$18,360	1	$291
	SubsidizedWithHeat	1	$200	0	$200
	SubsidizedNoHeat	355	$99,504	7	$280
	Roomer	4	$1,375	0	$344
	Other	47	$13,883	1	$295
RACE	AmericanIndian	2	$1,200	0	$600
	Other	1,699	$453,837	35	$267
	NativeHawaiian	17	$5,340	0	$314
	Black	384	$100,219	8	$261
	White	2,551	$675,654	53	$265
	Asian	20	$5,632	0	$282
	Unknown	155	$43,620	3	$281
DISABLED	YES	1,173	$256,524	24	$219
	NO	3,655	$1,028,978	76	$282
AGE 60 & ABV	YES	1,916	$433,923	40	$226
	NO	2,912	$851,579	60	$292
AGE 5 & BLW	YES	1,025	$283,953	21	$277
	NO	3,803	$1,001,549	79	$263
PAY_TYPE	DIRECT	81	$23,001	2	$284
	PROVIDER	4,777	$1,272,566	98	$266
REFUNDS		144	$26,102		$181

AVERAGE HOUSEHOLD SIZE: 3.55

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	1,965	$524,328	41	$267
	FuelOil	1,150	$319,734	24	$278
	Coal	1	$200	0	$200
	NaturalGas	1,482	$380,476	31	$257
	Kerosene	25	$8,413	1	$337
	Propane	203	$51,828	4	$255
	WoodOrOther	0	$0	0	$0
	BlendedFuel	2	$523	0	$262
INCOME RANGE	0 - 999	163	$163,000	3	$1,000
	1000 - 1999	20	$20,000	0	$1,000
	2000 - 2999	33	$32,413	1	$982
	3000 - 3999	36	$29,355	1	$815
	4000 - 4999	44	$32,022	1	$728
	5000 - 5999	43	$25,675	1	$597
	6000 - 6999	38	$19,453	1	$512
	7000 - 7999	54	$24,199	1	$448
	8000 - 8999	62	$24,000	1	$387
	9000 - 9999	82	$28,590	2	$349
	10000 - 10999	105	$30,941	2	$295
	11000 - 11999	322	$81,836	7	$254
	12000 - 12999	346	$76,843	7	$222
	13000 - 13999	178	$36,694	4	$206
	14000 - 14999	190	$38,074	4	$200
	15000 - 15999	204	$40,807	4	$200
	16000 - 16999	198	$39,600	4	$200
	17000 - 17999	204	$40,800	4	$200
	18000 - 18999	210	$42,000	4	$200
	19000 - 19999	235	$47,000	5	$200
	> 19999	2,061	$412,200	43	$200
PAYMENT TYPE	Regular	4,828	$1,285,502		$266
	Reissue	7	$2,311		$330
	Secondpay	23	$7,754		$337
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		4,858	$1,295,567		$267
RECOUPMENTS		3	$1,964		$655
NET PAID			$1,293,603		
PMT SUB TYPE	APD	0	$0		$0
	STD	4,858	$1,295,567		$267

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 07

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,809	$476,646	42	$263
	Renter	1,749	$530,370	41	$303
	RenterWithHeat	60	$16,919	1	$282
	SubsidizedWithHeat	1	$200	0	$200
	SubsidizedNoHeat	582	$198,345	14	$341
	Roomer	0	$0	0	$0
	Other	65	$21,793	2	$335
RACE	AmericanIndian	10	$2,985	0	$298
	Other	33	$11,773	1	$357
	NativeHawaiian	3	$1,400	0	$467
	Black	211	$68,612	5	$325
	White	3,956	$1,146,174	93	$290
	Asian	11	$4,671	0	$425
	Unknown	42	$8,658	1	$206
DISABLED	YES	1,286	$295,878	30	$230
	NO	2,980	$948,395	70	$318
AGE 60 & ABV	YES	1,988	$463,919	47	$233
	NO	2,278	$780,354	53	$343
AGE 5 & BLW	YES	608	$196,790	14	$324
	NO	3,658	$1,047,483	86	$286
PAY_TYPE	DIRECT	70	$23,476	2	$335
	PROVIDER	4,214	$1,226,476	98	$291
REFUNDS		99	$30,464		$308

AVERAGE HOUSEHOLD SIZE: 3.22

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	1,111	$342,258	26	$308
	FuelOil	1,016	$277,844	24	$273
	Coal	13	$3,446	0	$265
	NaturalGas	1,860	$532,072	44	$286
	Kerosene	77	$22,355	2	$290
	Propane	99	$31,941	2	$323
	WoodOrOther	21	$9,920	0	$472
	BlendedFuel	69	$24,437	2	$354
INCOME RANGE	0 - 999	231	$231,000	5	$1,000
	1000 - 1999	34	$34,000	1	$1,000
	2000 - 2999	34	$34,000	1	$1,000
	3000 - 3999	36	$32,052	1	$890
	4000 - 4999	24	$18,737	1	$781
	5000 - 5999	21	$13,559	0	$646
	6000 - 6999	43	$23,709	1	$551
	7000 - 7999	28	$13,336	1	$476
	8000 - 8999	46	$19,277	1	$419
	9000 - 9999	69	$25,115	2	$364
	10000 - 10999	72	$23,010	2	$320
	11000 - 11999	395	$110,029	9	$279
	12000 - 12999	391	$94,596	9	$242
	13000 - 13999	191	$40,542	4	$212
	14000 - 14999	188	$37,839	4	$201
	15000 - 15999	194	$38,872	5	$200
	16000 - 16999	195	$39,000	5	$200
	17000 - 17999	191	$38,200	4	$200
	18000 - 18999	226	$45,200	5	$200
	19000 - 19999	187	$37,400	4	$200
	> 19999	1,469	$293,800	34	$200
PAYMENT TYPE	Regular	4,266	$1,244,273		$292
	Reissue	2	$200		$100
	Secondpay	13	$5,209		$401
	Underpay	1	$70		$70
	Extraordinary	2	$200		$100
TOTAL PMT		4,284	$1,249,952		$292
RECOUPMENTS		27	$6,574		$243
NET PAID			$1,243,378		
PMT SUB TYPE	APD	0	$0		$0
	STD	4,284	$1,249,952		$292

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 08

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	730	$183,562	45	$251
	Renter	739	$220,018	45	$298
	RenterWithHeat	17	$6,354	1	$374
	SubsidizedWithHeat	1	$216	0	$216
	SubsidizedNoHeat	104	$29,190	6	$281
	Roomer	2	$882	0	$441
	Other	41	$15,462	3	$377
RACE	AmericanIndian	6	$2,834	0	$472
	Other	22	$7,844	1	$357
	NativeHawaiian	1	$216	0	$216
	Black	18	$6,210	1	$345
	White	1,571	$434,933	96	$277
	Asian	5	$1,171	0	$234
	Unknown	11	$2,476	1	$225
DISABLED	YES	496	$116,114	30	$234
	NO	1,138	$339,570	70	$298
AGE 60 & ABV	YES	781	$182,830	48	$234
	NO	853	$272,854	52	$320
AGE 5 & BLW	YES	264	$74,857	16	$284
	NO	1,370	$380,827	84	$278
PAY_TYPE	DIRECT	67	$22,234	4	$332
	PROVIDER	1,577	$434,622	96	$276
REFUNDS		55	$8,526		$155

AVERAGE HOUSEHOLD SIZE: 3.68

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	501	$150,053	31	$300
	FuelOil	409	$110,651	25	$271
	Coal	13	$3,364	1	$259
	NaturalGas	463	$120,599	28	$260
	Kerosene	6	$1,404	0	$234
	Propane	190	$55,791	12	$294
	WoodOrOther	45	$11,898	3	$264
	BlendedFuel	7	$1,924	0	$275
INCOME RANGE	0 - 999	52	$52,000	3	$1,000
	1000 - 1999	11	$11,000	1	$1,000
	2000 - 2999	15	$14,913	1	$994
	3000 - 3999	9	$8,178	1	$909
	4000 - 4999	15	$12,516	1	$834
	5000 - 5999	11	$7,272	1	$661
	6000 - 6999	14	$8,392	1	$599
	7000 - 7999	13	$6,680	1	$514
	8000 - 8999	10	$4,673	1	$467
	9000 - 9999	28	$10,767	2	$385
	10000 - 10999	33	$11,127	2	$337
	11000 - 11999	145	$42,635	9	$294
	12000 - 12999	137	$35,088	8	$256
	13000 - 13999	76	$17,179	5	$226
	14000 - 14999	69	$14,064	4	$204
	15000 - 15999	62	$12,400	4	$200
	16000 - 16999	86	$17,200	5	$200
	17000 - 17999	71	$14,200	4	$200
	18000 - 18999	70	$14,000	4	$200
	19000 - 19999	72	$14,400	4	$200
	> 19999	635	$127,000	39	$200
PAYMENT TYPE	Regular	1,634	$455,684		$279
	Reissue	1	$80		$80
	Secondpay	7	$902		$129
	Underpay	1	$90		$90
	Extraordinary	1	$100		$100
TOTAL PMT		1,644	$456,856		$278
RECOUPMENTS		4	$600		$150
NET PAID			$456,256		
PMT SUB TYPE	APD	0	$0		$0
	STD	1,644	$456,856		$278

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 09

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,737	$467,461	37	$269
	Renter	1,774	$478,492	38	$270
	RenterWithHeat	101	$26,306	2	$260
	SubsidizedWithHeat	5	$1,129	0	$226
	SubsidizedNoHeat	1,018	$258,700	22	$254
	Roomer	4	$1,550	0	$388
	Other	37	$11,842	1	$320
RACE	AmericanIndian	13	$4,030	0	$310
	Other	399	$108,669	9	$272
	NativeHawaiian	12	$2,400	0	$200
	Black	559	$161,094	12	$288
	White	3,426	$899,559	73	$263
	Asian	141	$36,639	3	$260
	Unknown	126	$33,089	3	$263
DISABLED	YES	1,032	$225,305	22	$218
	NO	3,644	$1,020,175	78	$280
AGE 60 & ABV	YES	2,383	$543,836	51	$228
	NO	2,293	$701,644	49	$306
AGE 5 & BLW	YES	649	$189,870	14	$293
	NO	4,027	$1,055,610	86	$262
PAY_TYPE	DIRECT	142	$39,351	3	$277
	PROVIDER	4,567	$1,212,527	97	$265
REFUNDS		137	$32,024		$234

AVERAGE HOUSEHOLD SIZE: 2.81

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	2,395	$656,906	51	$274
	FuelOil	920	$243,641	20	$265
	Coal	0	$0	0	$0
	NaturalGas	1,168	$300,225	25	$257
	Kerosene	1	$200	0	$200
	Propane	192	$44,508	4	$232
	WoodOrOther	0	$0	0	$0
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	189	$189,000	4	$1,000
	1000 - 1999	21	$21,000	0	$1,000
	2000 - 2999	26	$25,626	1	$986
	3000 - 3999	30	$24,103	1	$803
	4000 - 4999	28	$19,935	1	$712
	5000 - 5999	25	$14,035	1	$561
	6000 - 6999	40	$20,087	1	$502
	7000 - 7999	54	$23,666	1	$438
	8000 - 8999	65	$24,929	1	$384
	9000 - 9999	72	$23,814	2	$331
	10000 - 10999	85	$24,585	2	$289
	11000 - 11999	424	$104,972	9	$248
	12000 - 12999	360	$78,023	8	$217
	13000 - 13999	181	$36,505	4	$202
	14000 - 14999	174	$34,800	4	$200
	15000 - 15999	206	$41,200	4	$200
	16000 - 16999	206	$41,200	4	$200
	17000 - 17999	241	$48,200	5	$200
	18000 - 18999	239	$47,800	5	$200
	19000 - 19999	251	$50,200	5	$200
	> 19999	1,759	$351,800	38	$200
PAYMENT TYPE	Regular	4,676	$1,245,480		$266
	Reissue	5	$917		$183
	Secondpay	28	$5,481		$196
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		4,709	$1,251,878		$266
RECOUPMENTS		11	$1,590		$145
NET PAID			$1,250,288		
PMT SUB TYPE	APD	0	$0		$0
	STD	4,709	$1,251,878		$266

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 10

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,274	$333,267	45	$262
	Renter	1,015	$280,945	36	$277
	RenterWithHeat	17	$3,922	1	$231
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	469	$141,044	17	$301
	Roomer	1	$1,000	0	$1,000
	Other	55	$17,916	2	$326
RACE	AmericanIndian	12	$4,024	0	$335
	Other	39	$10,346	1	$265
	NativeHawaiian	1	$1,000	0	$1,000
	Black	80	$24,618	3	$308
	White	2,658	$727,359	94	$274
	Asian	8	$1,714	0	$214
	Unknown	33	$9,033	1	$274
DISABLED	YES	822	$184,882	29	$225
	NO	2,009	$593,212	71	$295
AGE 60 & ABV	YES	1,396	$324,467	49	$232
	NO	1,435	$453,627	51	$316
AGE 5 & BLW	YES	339	$95,708	12	$282
	NO	2,492	$682,386	88	$274
PAY_TYPE	DIRECT	21	$7,971	1	$380
	PROVIDER	2,826	$772,994	99	$274
REFUNDS		87	$16,494		$190

AVERAGE HOUSEHOLD SIZE: 2.81

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	1,054	$300,345	37	$285
	FuelOil	264	$72,794	9	$276
	Coal	0	$0	0	$0
	NaturalGas	1,210	$321,306	43	$266
	Kerosene	22	$5,652	1	$257
	Propane	253	$70,030	9	$277
	WoodOrOther	14	$3,736	0	$267
	BlendedFuel	14	$4,231	0	$302
INCOME RANGE	0 - 999	105	$105,000	4	$1,000
	1000 - 1999	22	$22,000	1	$1,000
	2000 - 2999	28	$28,000	1	$1,000
	3000 - 3999	21	$17,725	1	$844
	4000 - 4999	10	$7,332	0	$733
	5000 - 5999	22	$13,154	1	$598
	6000 - 6999	27	$14,138	1	$524
	7000 - 7999	29	$13,137	1	$453
	8000 - 8999	35	$13,832	1	$395
	9000 - 9999	40	$14,029	1	$351
	10000 - 10999	73	$21,974	3	$301
	11000 - 11999	255	$66,940	9	$263
	12000 - 12999	268	$61,170	9	$228
	13000 - 13999	139	$28,261	5	$203
	14000 - 14999	128	$25,602	5	$200
	15000 - 15999	129	$25,800	5	$200
	16000 - 16999	141	$28,200	5	$200
	17000 - 17999	140	$28,000	5	$200
	18000 - 18999	145	$29,000	5	$200
	19000 - 19999	112	$22,400	4	$200
	> 19999	962	$192,400	34	$200
PAYMENT TYPE	Regular	2,831	$778,094		$275
	Reissue	3	$500		$167
	Secondpay	11	$2,171		$197
	Underpay	0	$0		$0
	Extraordinary	2	$200		$100
TOTAL PMT		2,847	$780,965		$274
RECOUPMENTS		3	$371		$124
NET PAID			$780,594		
PMT SUB TYPE	APD	0	$0		$0
	STD	2,847	$780,965		$274

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 11

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	2,842	$780,463	54	$275
	Renter	1,877	$576,923	36	$307
	RenterWithHeat	65	$16,705	1	$257
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	390	$143,162	7	$367
	Roomer	2	$572	0	$286
	Other	87	$27,494	2	$316
RACE	AmericanIndian	5	$1,836	0	$367
	Other	113	$36,946	2	$327
	NativeHawaiian	6	$2,806	0	$468
	Black	392	$126,468	7	$323
	White	4,670	$1,353,955	89	$290
	Asian	9	$3,606	0	$401
	Unknown	68	$19,702	1	$290
DISABLED	YES	1,429	$331,302	27	$232
	NO	3,834	$1,214,017	73	$317
AGE 60 & ABV	YES	2,562	$593,671	49	$232
	NO	2,701	$951,648	51	$352
AGE 5 & BLW	YES	702	$224,750	13	$320
	NO	4,561	$1,320,569	87	$290
PAY_TYPE	DIRECT	68	$20,078	1	$295
	PROVIDER	5,246	$1,538,609	99	$293
REFUNDS		133	$33,870		$255

AVERAGE HOUSEHOLD SIZE: 2.88

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	1,057	$338,235	20	$320
	FuelOil	2,041	$585,180	39	$287
	Coal	136	$38,095	3	$280
	NaturalGas	1,818	$522,731	35	$288
	Kerosene	20	$6,032	0	$302
	Propane	124	$33,367	2	$269
	WoodOrOther	47	$15,867	1	$338
	BlendedFuel	20	$5,812	0	$291
INCOME RANGE	0 - 999	262	$261,469	5	$998
	1000 - 1999	54	$53,948	1	$999
	2000 - 2999	40	$40,000	1	$1,000
	3000 - 3999	41	$36,118	1	$881
	4000 - 4999	43	$33,928	1	$789
	5000 - 5999	57	$35,809	1	$628
	6000 - 6999	43	$23,543	1	$548
	7000 - 7999	71	$33,635	1	$474
	8000 - 8999	56	$23,240	1	$415
	9000 - 9999	82	$29,965	2	$365
	10000 - 10999	128	$40,514	2	$317
	11000 - 11999	440	$121,473	8	$276
	12000 - 12999	457	$110,371	9	$242
	13000 - 13999	222	$47,090	4	$212
	14000 - 14999	224	$44,813	4	$200
	15000 - 15999	224	$44,803	4	$200
	16000 - 16999	231	$46,200	4	$200
	17000 - 17999	219	$43,800	4	$200
	18000 - 18999	251	$50,200	5	$200
	19000 - 19999	249	$49,800	5	$200
	> 19999	1,868	$373,600	35	$200
PAYMENT TYPE	Regular	5,263	$1,545,319		$294
	Reissue	3	$1,034		$345
	Secondpay	46	$11,885		$258
	Underpay	2	$449		$224
	Extraordinary	0	$0		$0
TOTAL PMT		5,314	$1,558,687		$293
RECOUPMENTS		19	$3,192		$168
NET PAID			$1,555,495		
PMT SUB TYPE	APD	0	$0		$0
	STD	5,314	$1,558,687		$293

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 12

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	103	$26,617	46	$258
	Renter	73	$20,664	33	$283
	RenterWithHeat	1	$200	0	$200
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	41	$13,732	18	$335
	Roomer	0	$0	0	$0
	Other	4	$1,220	2	$305
RACE	AmericanIndian	0	$0	0	$0
	Other	1	$200	0	$200
	NativeHawaiian	0	$0	0	$0
	Black	7	$1,709	3	$244
	White	213	$60,248	96	$283
	Asian	1	$276	0	$276
	Unknown	0	$0	0	$0
DISABLED	YES	59	$13,966	27	$237
	NO	163	$48,467	73	$297
AGE 60 & ABV	YES	128	$29,878	58	$233
	NO	94	$32,555	42	$346
AGE 5 & BLW	YES	18	$5,957	8	$331
	NO	204	$56,476	92	$277
PAY_TYPE	DIRECT	0	$0	0	$0
	PROVIDER	224	$62,536	100	$279
REFUNDS		4	$614		$154

AVERAGE HOUSEHOLD SIZE: 2.45

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	97	$29,314	44	$302
	FuelOil	18	$4,596	8	$255
	Coal	1	$200	0	$200
	NaturalGas	75	$19,158	34	$255
	Kerosene	2	$820	1	$410
	Propane	21	$6,600	9	$314
	WoodOrOther	8	$1,745	4	$218
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	4	$4,000	2	$1,000
	1000 - 1999	8	$8,000	4	$1,000
	2000 - 2999	2	$2,000	1	$1,000
	3000 - 3999	1	$904	0	$904
	4000 - 4999	1	$803	0	$803
	5000 - 5999	0	$0	0	$0
	6000 - 6999	0	$0	0	$0
	7000 - 7999	1	$489	0	$489
	8000 - 8999	4	$1,919	2	$480
	9000 - 9999	1	$470	0	$470
	10000 - 10999	5	$1,713	2	$343
	11000 - 11999	19	$5,553	9	$292
	12000 - 12999	23	$5,820	10	$253
	13000 - 13999	6	$1,355	3	$226
	14000 - 14999	6	$1,200	3	$200
	15000 - 15999	11	$2,207	5	$201
	16000 - 16999	9	$1,800	4	$200
	17000 - 17999	13	$2,600	6	$200
	18000 - 18999	11	$2,200	5	$200
	19000 - 19999	20	$4,000	9	$200
	> 19999	77	$15,400	35	$200
PAYMENT TYPE	Regular	222	$62,433		$281
	Reissue	0	$0		$0
	Secondpay	2	$103		$52
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		224	$62,536		$279
RECOUPMENTS		2	$103		$52
NET PAID			$62,433		
PMT SUB TYPE	APD	0	$0		$0
	STD	224	$62,536		$279

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 13

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	860	$222,155	42	$258
	Renter	837	$229,563	41	$274
	RenterWithHeat	9	$1,881	0	$209
	SubsidizedWithHeat	1	$208	0	$208
	SubsidizedNoHeat	295	$95,881	15	$325
	Roomer	3	$785	0	$262
	Other	22	$7,315	1	$332
RACE	AmericanIndian	11	$4,209	1	$383
	Other	100	$27,705	5	$277
	NativeHawaiian	2	$1,200	0	$600
	Black	84	$24,314	4	$289
	White	1,797	$492,179	89	$274
	Asian	4	$898	0	$224
	Unknown	29	$7,283	1	$251
DISABLED	YES	551	$120,971	27	$220
	NO	1,476	$436,817	73	$296
AGE 60 & ABV	YES	963	$220,264	48	$229
	NO	1,064	$337,524	52	$317
AGE 5 & BLW	YES	343	$99,673	17	$291
	NO	1,684	$458,115	83	$272
PAY_TYPE	DIRECT	15	$4,024	1	$268
	PROVIDER	2,042	$559,451	99	$274
REFUNDS		56	$7,984		$143

AVERAGE HOUSEHOLD SIZE: 3.02

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	840	$239,534	41	$285
	FuelOil	876	$236,465	43	$270
	Coal	62	$16,993	3	$274
	NaturalGas	105	$25,393	5	$242
	Kerosene	34	$7,850	2	$231
	Propane	103	$29,296	5	$284
	WoodOrOther	4	$857	0	$214
	BlendedFuel	3	$1,400	0	$467
INCOME RANGE	0 - 999	73	$70,736	4	$969
	1000 - 1999	20	$20,000	1	$1,000
	2000 - 2999	16	$16,000	1	$1,000
	3000 - 3999	13	$11,480	1	$883
	4000 - 4999	12	$9,427	1	$786
	5000 - 5999	17	$11,053	1	$650
	6000 - 6999	15	$8,397	1	$560
	7000 - 7999	16	$7,818	1	$489
	8000 - 8999	22	$9,398	1	$427
	9000 - 9999	29	$11,096	1	$383
	10000 - 10999	37	$11,941	2	$323
	11000 - 11999	134	$37,770	7	$282
	12000 - 12999	152	$36,933	7	$243
	13000 - 13999	95	$20,492	5	$216
	14000 - 14999	95	$19,009	5	$200
	15000 - 15999	82	$16,438	4	$200
	16000 - 16999	91	$18,200	4	$200
	17000 - 17999	92	$18,400	5	$200
	18000 - 18999	86	$17,200	4	$200
	19000 - 19999	107	$21,400	5	$200
	> 19999	823	$164,600	41	$200
PAYMENT TYPE	Regular	2,027	$557,788		$275
	Reissue	0	$0		$0
	Secondpay	29	$5,386		$186
	Underpay	1	$301		$301
	Extraordinary	0	$0		$0
TOTAL PMT		2,057	$563,475		$274
RECOUPMENTS		13	$2,225		$171
NET PAID			$561,250		
PMT SUB TYPE	APD	0	$0		$0
	STD	2,057	$563,475		$274

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 14

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	643	$169,136	43	$263
	Renter	654	$206,237	43	$315
	RenterWithHeat	19	$4,570	1	$241
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	167	$53,321	11	$319
	Roomer	0	$0	0	$0
	Other	27	$7,519	2	$278
RACE	AmericanIndian	1	$213	0	$213
	Other	35	$14,871	2	$425
	NativeHawaiian	0	$0	0	$0
	Black	67	$20,950	4	$313
	White	1,376	$397,428	91	$289
	Asian	17	$3,767	1	$222
	Unknown	14	$3,554	1	$254
DISABLED	YES	401	$93,626	27	$233
	NO	1,109	$347,157	73	$313
AGE 60 & ABV	YES	719	$172,905	48	$240
	NO	791	$267,878	52	$339
AGE 5 & BLW	YES	179	$52,708	12	$294
	NO	1,331	$388,075	88	$292
PAY_TYPE	DIRECT	28	$9,544	2	$341
	PROVIDER	1,486	$431,739	98	$291
REFUNDS		50	$8,004		$160

AVERAGE HOUSEHOLD SIZE: 2.86

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	664	$202,471	44	$305
	FuelOil	625	$170,243	41	$272
	Coal	16	$4,644	1	$290
	NaturalGas	117	$36,657	8	$313
	Kerosene	7	$2,132	0	$305
	Propane	60	$15,631	4	$261
	WoodOrOther	21	$9,005	1	$429
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	67	$66,844	4	$998
	1000 - 1999	11	$11,000	1	$1,000
	2000 - 2999	14	$14,000	1	$1,000
	3000 - 3999	15	$13,609	1	$907
	4000 - 4999	8	$6,380	1	$798
	5000 - 5999	10	$6,502	1	$650
	6000 - 6999	17	$9,648	1	$568
	7000 - 7999	18	$9,013	1	$501
	8000 - 8999	30	$12,688	2	$423
	9000 - 9999	29	$11,129	2	$384
	10000 - 10999	36	$11,958	2	$332
	11000 - 11999	105	$29,845	7	$284
	12000 - 12999	134	$33,545	9	$250
	13000 - 13999	67	$14,701	4	$219
	14000 - 14999	58	$11,721	4	$202
	15000 - 15999	68	$13,600	5	$200
	16000 - 16999	77	$15,400	5	$200
	17000 - 17999	82	$16,400	5	$200
	18000 - 18999	75	$15,000	5	$200
	19000 - 19999	87	$17,400	6	$200
	> 19999	502	$100,400	33	$200
PAYMENT TYPE	Regular	1,510	$440,783		$292
	Reissue	0	$0		$0
	Secondpay	4	$500		$125
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,514	$441,283		$291
RECOUPMENTS		0	$0		$0
NET PAID			$441,283		
PMT SUB TYPE	APD	0	$0		$0
	STD	1,514	$441,283		$291

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	829	$227,580	28	$275
	Renter	1,394	$396,925	47	$285
	RenterWithHeat	46	$13,101	2	$285
	SubsidizedWithHeat	1	$956	0	$956
	SubsidizedNoHeat	639	$207,268	22	$324
	Roomer	4	$1,657	0	$414
	Other	33	$10,041	1	$304
RACE	AmericanIndian	18	$5,028	1	$279
	Other	237	$65,488	8	$276
	NativeHawaiian	3	$600	0	$200
	Black	823	$256,987	28	$312
	White	1,683	$471,041	57	$280
	Asian	69	$24,015	2	$348
	Unknown	113	$34,369	4	$304
DISABLED	YES	684	$147,161	23	$215
	NO	2,262	$710,367	77	$314
AGE 60 & ABV	YES	1,282	$311,039	44	$243
	NO	1,664	$546,489	56	$328
AGE 5 & BLW	YES	558	$169,962	19	$305
	NO	2,388	$687,566	81	$288
PAY_TYPE	DIRECT	67	$20,399	2	$304
	PROVIDER	2,890	$841,122	98	$291
REFUNDS		79	$19,067		$241

AVERAGE HOUSEHOLD SIZE: 3.12

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	1,741	$508,182	59	$292
	FuelOil	504	$148,537	17	$295
	Coal	0	$0	0	$0
	NaturalGas	498	$147,063	17	$295
	Kerosene	6	$1,495	0	$249
	Propane	196	$51,996	7	$265
	WoodOrOther	1	$255	0	$255
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	156	$156,000	5	$1,000
	1000 - 1999	35	$34,918	1	$998
	2000 - 2999	41	$38,376	1	$936
	3000 - 3999	29	$22,496	1	$776
	4000 - 4999	33	$22,912	1	$694
	5000 - 5999	25	$13,819	1	$553
	6000 - 6999	28	$13,529	1	$483
	7000 - 7999	35	$14,914	1	$426
	8000 - 8999	41	$15,475	1	$377
	9000 - 9999	41	$13,216	1	$322
	10000 - 10999	53	$14,993	2	$283
	11000 - 11999	185	$44,946	6	$243
	12000 - 12999	241	$50,915	8	$211
	13000 - 13999	101	$20,619	3	$204
	14000 - 14999	111	$22,200	4	$200
	15000 - 15999	138	$27,600	5	$200
	16000 - 16999	130	$26,000	4	$200
	17000 - 17999	120	$24,000	4	$200
	18000 - 18999	133	$26,600	5	$200
	19000 - 19999	130	$26,000	4	$200
	> 19999	1,140	$228,000	39	$200
PAYMENT TYPE	Regular	2,946	$857,528		$291
	Reissue	1	$200		$200
	Secondpay	9	$2,981		$331
	Underpay	0	$0		$0
	Extraordinary	1	$812		$812
TOTAL PMT		2,957	$861,521		$291
RECOUPMENTS		2	$1,000		$500
NET PAID			$860,521		
PMT SUB TYPE	APD	0	$0		$0
	STD	2,957	$861,521		$291

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	421	$108,965	39	$259
	Renter	401	$111,783	37	$279
	RenterWithHeat	8	$2,512	1	$314
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	222	$73,562	21	$331
	Roomer	0	$0	0	$0
	Other	27	$7,843	3	$290
RACE	AmericanIndian	2	$476	0	$238
	Other	11	$2,380	1	$216
	NativeHawaiian	0	$0	0	$0
	Black	37	$14,272	3	$386
	White	1,014	$282,973	94	$279
	Asian	0	$0	0	$0
	Unknown	15	$4,564	1	$304
DISABLED	YES	349	$80,614	32	$231
	NO	730	$224,051	68	$307
AGE 60 & ABV	YES	530	$122,429	49	$231
	NO	549	$182,236	51	$332
AGE 5 & BLW	YES	109	$37,724	10	$346
	NO	970	$266,941	90	$275
PAY_TYPE	DIRECT	14	$3,913	1	$280
	PROVIDER	1,076	$303,994	99	$283
REFUNDS		54	$11,476		$213

AVERAGE HOUSEHOLD SIZE: 2.79

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	396	$125,780	37	$318
	FuelOil	52	$12,272	5	$236
	Coal	1	$200	0	$200
	NaturalGas	569	$148,176	53	$260
	Kerosene	3	$600	0	$200
	Propane	42	$11,162	4	$266
	WoodOrOther	15	$6,275	1	$418
	BlendedFuel	1	$200	0	$200
INCOME RANGE	0 - 999	51	$51,000	5	$1,000
	1000 - 1999	6	$6,000	1	$1,000
	2000 - 2999	4	$4,000	0	$1,000
	3000 - 3999	7	$6,056	1	$865
	4000 - 4999	7	$5,376	1	$768
	5000 - 5999	12	$7,453	1	$621
	6000 - 6999	10	$5,381	1	$538
	7000 - 7999	10	$4,695	1	$470
	8000 - 8999	14	$5,866	1	$419
	9000 - 9999	8	$2,891	1	$361
	10000 - 10999	23	$7,244	2	$315
	11000 - 11999	101	$27,532	9	$273
	12000 - 12999	134	$32,067	12	$239
	13000 - 13999	71	$14,824	7	$209
	14000 - 14999	49	$9,880	5	$202
	15000 - 15999	37	$7,400	3	$200
	16000 - 16999	52	$10,400	5	$200
	17000 - 17999	39	$7,800	4	$200
	18000 - 18999	44	$8,800	4	$200
	19000 - 19999	44	$8,800	4	$200
	> 19999	356	$71,200	33	$200
PAYMENT TYPE	Regular	1,079	$304,665		$282
	Reissue	3	$581		$194
	Secondpay	6	$1,797		$300
	Underpay	1	$764		$764
	Extraordinary	1	$100		$100
TOTAL PMT		1,090	$307,907		$282
RECOUPMENTS		1	$236		$236
NET PAID			$307,671		
PMT SUB TYPE	APD	0	$0		$0
	STD	1,090	$307,907		$282

Energy Assistance Summary (EASUM)

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County 17

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,947	$552,195	56	$284
	Renter	1,152	$369,416	33	$321
	RenterWithHeat	66	$19,920	2	$302
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	228	$84,324	7	$370
	Roomer	5	$2,779	0	$556
	Other	90	$36,561	3	$406
RACE	AmericanIndian	4	$1,719	0	$430
	Other	33	$12,945	1	$392
	NativeHawaiian	4	$1,042	0	$260
	Black	32	$14,905	1	$466
	White	3,394	$1,026,953	97	$303
	Asian	3	$2,108	0	$703
	Unknown	18	$5,523	1	$307
DISABLED	YES	968	$230,613	28	$238
	NO	2,520	$834,582	72	$331
AGE 60 & ABV	YES	1,763	$420,610	51	$239
	NO	1,725	$644,585	49	$374
AGE 5 & BLW	YES	400	$139,040	11	$348
	NO	3,088	$926,155	89	$300
PAY_TYPE	DIRECT	84	$28,305	2	$337
	PROVIDER	3,450	$1,046,854	98	$303
REFUNDS		166	$42,294		$255

AVERAGE HOUSEHOLD SIZE: 2.9

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	732	$248,415	21	$339
	FuelOil	1,852	$545,132	53	$294
	Coal	68	$18,646	2	$274
	NaturalGas	510	$157,166	15	$308
	Kerosene	16	$5,140	0	$321
	Propane	233	$66,859	7	$287
	WoodOrOther	61	$18,595	2	$305
	BlendedFuel	16	$5,242	0	$328
INCOME RANGE	0 - 999	204	$201,600	6	$988
	1000 - 1999	32	$32,000	1	$1,000
	2000 - 2999	29	$28,790	1	$993
	3000 - 3999	31	$29,194	1	$942
	4000 - 4999	33	$28,354	1	$859
	5000 - 5999	23	$15,848	1	$689
	6000 - 6999	36	$21,395	1	$594
	7000 - 7999	28	$14,448	1	$516
	8000 - 8999	34	$15,394	1	$453
	9000 - 9999	61	$24,112	2	$395
	10000 - 10999	79	$27,600	2	$349
	11000 - 11999	237	$71,406	7	$301
	12000 - 12999	279	$72,991	8	$262
	13000 - 13999	141	$32,866	4	$233
	14000 - 14999	142	$29,397	4	$207
	15000 - 15999	132	$26,400	4	$200
	16000 - 16999	171	$34,200	5	$200
	17000 - 17999	168	$33,600	5	$200
	18000 - 18999	174	$34,800	5	$200
	19000 - 19999	176	$35,200	5	$200
	> 19999	1,278	$255,600	37	$200
PAYMENT TYPE	Regular	3,488	$1,065,195		$305
	Reissue	4	$2,104		$526
	Secondpay	40	$7,724		$193
	Underpay	1	$36		$36
	Extraordinary	1	$100		$100
TOTAL PMT		3,534	$1,075,159		$304
RECOUPMENTS		14	$2,385		$170
NET PAID			$1,072,774		
PMT SUB TYPE	APD	0	$0		$0
	STD	3,534	$1,075,159		$304

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	559	$147,139	46	$263
	Renter	521	$142,985	43	$274
	RenterWithHeat	19	$4,016	2	$211
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	92	$41,597	8	$452
	Roomer	0	$0	0	$0
	Other	20	$5,414	2	$271
RACE	AmericanIndian	1	$200	0	$200
	Other	15	$3,036	1	$202
	NativeHawaiian	0	$0	0	$0
	Black	25	$9,659	2	$386
	White	1,157	$325,550	96	$281
	Asian	4	$836	0	$209
	Unknown	9	$1,870	1	$208
DISABLED	YES	284	$65,076	23	$229
	NO	927	$276,075	77	$298
AGE 60 & ABV	YES	630	$142,225	52	$226
	NO	581	$198,926	48	$342
AGE 5 & BLW	YES	178	$57,589	15	$324
	NO	1,033	$283,562	85	$275
PAY_TYPE	DIRECT	22	$7,679	2	$349
	PROVIDER	1,197	$336,662	98	$281
REFUNDS		40	$7,688		$192

AVERAGE HOUSEHOLD SIZE: 2.87

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	430	$132,812	36	$309
	FuelOil	534	$142,088	44	$266
	Coal	15	$3,305	1	$220
	NaturalGas	133	$36,257	11	$273
	Kerosene	0	$0	0	$0
	Propane	83	$21,365	7	$257
	WoodOrOther	14	$4,924	1	$352
	BlendedFuel	2	$400	0	$200
INCOME RANGE	0 - 999	46	$45,062	4	$980
	1000 - 1999	17	$17,000	1	$1,000
	2000 - 2999	5	$5,000	0	$1,000
	3000 - 3999	12	$10,691	1	$891
	4000 - 4999	11	$8,876	1	$807
	5000 - 5999	9	$5,783	1	$643
	6000 - 6999	9	$5,176	1	$575
	7000 - 7999	8	$3,943	1	$493
	8000 - 8999	17	$7,287	1	$429
	9000 - 9999	18	$6,844	1	$380
	10000 - 10999	15	$4,994	1	$333
	11000 - 11999	71	$20,178	6	$284
	12000 - 12999	99	$24,528	8	$248
	13000 - 13999	45	$9,950	4	$221
	14000 - 14999	56	$11,239	5	$201
	15000 - 15999	56	$11,200	5	$200
	16000 - 16999	51	$10,200	4	$200
	17000 - 17999	71	$14,200	6	$200
	18000 - 18999	70	$14,000	6	$200
	19000 - 19999	60	$12,000	5	$200
	> 19999	465	$93,000	38	$200
PAYMENT TYPE	Regular	1,211	$341,151		$282
	Reissue	2	$1,063		$532
	Secondpay	6	$2,127		$354
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,219	$344,341		$282
RECOUPMENTS		5	$1,400		$280
NET PAID			$342,941		
PMT SUB TYPE	APD	0	$0		$0
	STD	1,219	$344,341		$282

Energy Assistance Summary (EASUM)

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County 19

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	743	$192,832	40	$260
	Renter	863	$248,364	46	$288
	RenterWithHeat	10	$2,950	1	$295
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	209	$50,475	11	$242
	Roomer	1	$1,000	0	$1,000
	Other	30	$9,347	2	$312
RACE	AmericanIndian	6	$1,208	0	$201
	Other	73	$22,888	4	$314
	NativeHawaiian	1	$533	0	$533
	Black	53	$15,902	3	$300
	White	1,694	$458,164	91	$270
	Asian	7	$1,518	0	$217
	Unknown	22	$4,755	1	$216
DISABLED	YES	463	$107,969	25	$233
	NO	1,393	$396,999	75	$285
AGE 60 & ABV	YES	970	$221,137	52	$228
	NO	886	$283,831	48	$320
AGE 5 & BLW	YES	231	$66,126	12	$286
	NO	1,625	$438,842	88	$270
PAY_TYPE	DIRECT	16	$4,706	1	$294
	PROVIDER	1,859	$504,244	99	$271
REFUNDS		85	$13,460		$158

AVERAGE HOUSEHOLD SIZE: 2.74

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	751	$202,210	40	$269
	FuelOil	557	$150,183	30	$270
	Coal	18	$4,499	1	$250
	NaturalGas	311	$84,461	17	$272
	Kerosene	5	$1,184	0	$237
	Propane	170	$47,702	9	$281
	WoodOrOther	14	$4,800	1	$343
	BlendedFuel	30	$9,929	2	$331
INCOME RANGE	0 - 999	60	$60,000	3	$1,000
	1000 - 1999	11	$11,000	1	$1,000
	2000 - 2999	10	$10,000	1	$1,000
	3000 - 3999	7	$6,194	0	$885
	4000 - 4999	15	$12,445	1	$830
	5000 - 5999	16	$10,455	1	$653
	6000 - 6999	18	$10,029	1	$557
	7000 - 7999	18	$8,885	1	$494
	8000 - 8999	21	$9,001	1	$429
	9000 - 9999	29	$10,540	2	$363
	10000 - 10999	38	$12,824	2	$337
	11000 - 11999	131	$36,917	7	$282
	12000 - 12999	183	$45,008	10	$246
	13000 - 13999	84	$18,328	5	$218
	14000 - 14999	87	$17,738	5	$204
	15000 - 15999	96	$19,204	5	$200
	16000 - 16999	97	$19,400	5	$200
	17000 - 17999	99	$19,800	5	$200
	18000 - 18999	94	$18,800	5	$200
	19000 - 19999	101	$20,200	5	$200
	> 19999	641	$128,200	35	$200
PAYMENT TYPE	Regular	1,856	$504,968		$272
	Reissue	9	$900		$100
	Secondpay	9	$2,982		$331
	Underpay	0	$0		$0
	Extraordinary	1	$100		$100
TOTAL PMT		1,875	$508,950		$271
RECOUPMENTS		4	$600		$150
NET PAID			$508,350		
PMT SUB TYPE	APD	0	$0		$0
	STD	1,875	$508,950		$271

Energy Assistance Summary (EASUM)

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County 20

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,126	$289,723	45	$257
	Renter	1,117	$298,755	44	$267
	RenterWithHeat	33	$7,979	1	$242
	SubsidizedWithHeat	2	$481	0	$240
	SubsidizedNoHeat	204	$66,202	8	$325
	Roomer	0	$0	0	$0
	Other	45	$15,821	2	$352
RACE	AmericanIndian	9	$2,361	0	$262
	Other	22	$7,225	1	$328
	NativeHawaiian	1	$236	0	$236
	Black	74	$21,668	3	$293
	White	2,390	$639,548	95	$268
	Asian	7	$1,449	0	$207
	Unknown	24	$6,474	1	$270
DISABLED	YES	866	$198,154	34	$229
	NO	1,661	$480,807	66	$289
AGE 60 & ABV	YES	1,325	$301,635	52	$228
	NO	1,202	$377,326	48	$314
AGE 5 & BLW	YES	306	$97,967	12	$320
	NO	2,221	$580,994	88	$262
PAY_TYPE	DIRECT	55	$15,667	2	$285
	PROVIDER	2,499	$670,104	98	$268
REFUNDS		124	$22,601		$182

AVERAGE HOUSEHOLD SIZE: 3.01

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	685	$191,086	27	$279
	FuelOil	229	$66,487	9	$290
	Coal	13	$3,303	1	$254
	NaturalGas	1,023	$263,311	40	$257
	Kerosene	5	$1,096	0	$219
	Propane	494	$130,456	20	$264
	WoodOrOther	50	$16,170	2	$323
	BlendedFuel	28	$7,052	1	$252
INCOME RANGE	0 - 999	78	$77,200	3	$990
	1000 - 1999	10	$10,000	0	$1,000
	2000 - 2999	18	$18,000	1	$1,000
	3000 - 3999	20	$17,729	1	$886
	4000 - 4999	17	$13,370	1	$786
	5000 - 5999	15	$9,272	1	$618
	6000 - 6999	27	$14,518	1	$538
	7000 - 7999	15	$7,223	1	$482
	8000 - 8999	22	$9,120	1	$415
	9000 - 9999	35	$12,932	1	$369
	10000 - 10999	55	$17,350	2	$315
	11000 - 11999	221	$61,104	9	$276
	12000 - 12999	277	$66,468	11	$240
	13000 - 13999	110	$23,239	4	$211
	14000 - 14999	112	$22,436	4	$200
	15000 - 15999	128	$25,600	5	$200
	16000 - 16999	109	$21,800	4	$200
	17000 - 17999	124	$24,800	5	$200
	18000 - 18999	127	$25,400	5	$200
	19000 - 19999	113	$22,600	4	$200
	> 19999	894	$178,800	35	$200
PAYMENT TYPE	Regular	2,527	$678,961		$269
	Reissue	5	$748		$150
	Secondpay	22	$6,062		$276
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		2,554	$685,771		$269
RECOUPMENTS		11	$2,952		$268
NET PAID			$682,819		
PMT SUB TYPE	APD	0	$0		$0
	STD	2,554	$685,771		$269

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 21

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	912	$227,937	30	$250
	Renter	1,669	$442,377	54	$265
	RenterWithHeat	12	$4,097	0	$341
	SubsidizedWithHeat	1	$205	0	$205
	SubsidizedNoHeat	427	$120,570	14	$282
	Roomer	1	$231	0	$231
	Other	41	$13,829	1	$337
RACE	AmericanIndian	19	$6,978	1	$367
	Other	266	$68,748	9	$258
	NativeHawaiian	6	$2,790	0	$465
	Black	407	$115,930	13	$285
	White	2,192	$568,571	72	$259
	Asian	72	$19,261	2	$268
	Unknown	101	$26,968	3	$267
DISABLED	YES	676	$142,658	22	$211
	NO	2,387	$666,588	78	$279
AGE 60 & ABV	YES	1,200	$268,856	39	$224
	NO	1,863	$540,390	61	$290
AGE 5 & BLW	YES	620	$169,612	20	$274
	NO	2,443	$639,634	80	$262
PAY_TYPE	DIRECT	15	$4,166	0	$278
	PROVIDER	3,081	$812,920	100	$264
REFUNDS		116	$23,786		$205

AVERAGE HOUSEHOLD SIZE: 2.89

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	1,739	$469,502	57	$270
	FuelOil	489	$118,828	16	$243
	Coal	4	$832	0	$208
	NaturalGas	595	$158,553	19	$266
	Kerosene	29	$6,730	1	$232
	Propane	203	$53,200	7	$262
	WoodOrOther	4	$1,601	0	$400
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	114	$114,000	4	$1,000
	1000 - 1999	20	$19,924	1	$996
	2000 - 2999	20	$18,693	1	$935
	3000 - 3999	23	$17,049	1	$741
	4000 - 4999	32	$21,289	1	$665
	5000 - 5999	25	$13,322	1	$533
	6000 - 6999	30	$13,924	1	$464
	7000 - 7999	37	$14,983	1	$405
	8000 - 8999	42	$14,964	1	$356
	9000 - 9999	51	$15,811	2	$310
	10000 - 10999	57	$15,393	2	$270
	11000 - 11999	197	$46,177	6	$234
	12000 - 12999	205	$41,716	7	$203
	13000 - 13999	116	$23,201	4	$200
	14000 - 14999	135	$27,000	4	$200
	15000 - 15999	132	$26,400	4	$200
	16000 - 16999	136	$27,200	4	$200
	17000 - 17999	188	$37,600	6	$200
	18000 - 18999	148	$29,600	5	$200
	19000 - 19999	150	$30,000	5	$200
	> 19999	1,205	$241,000	39	$200
PAYMENT TYPE	Regular	3,063	$809,246		$264
	Reissue	12	$2,400		$200
	Secondpay	18	$5,040		$280
	Underpay	0	$0		$0
	Extraordinary	3	$400		$133
TOTAL PMT		3,096	$817,086		$264
RECOUPMENTS		4	$700		$175
NET PAID			$816,386		
PMT SUB TYPE	APD	0	$0		$0
	STD	3,096	$817,086		$264

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 22

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,111	$281,533	29	$253
	Renter	2,096	$545,536	54	$260
	RenterWithHeat	33	$9,687	1	$294
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	624	$197,122	16	$316
	Roomer	1	$256	0	$256
	Other	20	$4,414	1	$221
RACE	AmericanIndian	32	$9,534	1	$298
	Other	509	$143,118	13	$281
	NativeHawaiian	15	$3,127	0	$208
	Black	1,310	$359,613	34	$275
	White	1,822	$469,174	47	$258
	Asian	76	$21,335	2	$281
	Unknown	121	$32,647	3	$270
DISABLED	YES	986	$216,127	25	$219
	NO	2,899	$822,421	75	$284
AGE 60 & ABV	YES	1,566	$352,254	40	$225
	NO	2,319	$686,294	60	$296
AGE 5 & BLW	YES	785	$218,046	20	$278
	NO	3,100	$820,502	80	$265
PAY_TYPE	DIRECT	32	$11,308	1	$353
	PROVIDER	3,924	$1,041,445	99	$265
REFUNDS		168	$30,621		$182

AVERAGE HOUSEHOLD SIZE: 3.24

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	2,081	$555,300	54	$267
	FuelOil	580	$153,125	15	$264
	Coal	10	$2,047	0	$205
	NaturalGas	1,063	$290,471	27	$273
	Kerosene	1	$200	0	$200
	Propane	145	$36,405	4	$251
	WoodOrOther	5	$1,000	0	$200
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	124	$124,000	3	$1,000
	1000 - 1999	32	$32,000	1	$1,000
	2000 - 2999	33	$32,340	1	$980
	3000 - 3999	25	$20,472	1	$819
	4000 - 4999	25	$17,704	1	$708
	5000 - 5999	32	$18,164	1	$568
	6000 - 6999	32	$16,078	1	$502
	7000 - 7999	49	$21,266	1	$434
	8000 - 8999	67	$25,564	2	$382
	9000 - 9999	75	$24,873	2	$332
	10000 - 10999	81	$23,634	2	$292
	11000 - 11999	287	$71,742	7	$250
	12000 - 12999	310	$67,745	8	$219
	13000 - 13999	148	$29,966	4	$202
	14000 - 14999	184	$36,800	5	$200
	15000 - 15999	184	$36,800	5	$200
	16000 - 16999	154	$30,800	4	$200
	17000 - 17999	172	$34,400	4	$200
	18000 - 18999	198	$39,600	5	$200
	19000 - 19999	186	$37,200	5	$200
	> 19999	1,487	$297,400	38	$200
PAYMENT TYPE	Regular	3,885	$1,038,548		$267
	Reissue	44	$7,073		$161
	Secondpay	24	$5,932		$247
	Underpay	0	$0		$0
	Extraordinary	3	$1,200		$400
TOTAL PMT		3,956	$1,052,753		$266
RECOUPMENTS		3	$600		$200
NET PAID			$1,052,153		
PMT SUB TYPE	APD	0	$0		$0
	STD	3,956	$1,052,753		$266

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 23

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	2,190	$590,077	29	$269
	Renter	3,711	$991,708	49	$267
	RenterWithHeat	102	$24,083	1	$236
	SubsidizedWithHeat	5	$1,477	0	$295
	SubsidizedNoHeat	1,559	$444,470	20	$285
	Roomer	1	$232	0	$232
	Other	37	$12,921	0	$349
RACE	AmericanIndian	21	$6,955	0	$331
	Other	383	$104,366	5	$272
	NativeHawaiian	9	$2,856	0	$317
	Black	4,380	$1,214,647	58	$277
	White	2,376	$628,727	31	$265
	Asian	331	$80,714	4	$244
	Unknown	105	$26,703	1	$254
DISABLED	YES	2,186	$476,466	29	$218
	NO	5,419	$1,588,502	71	$293
AGE 60 & ABV	YES	3,341	$759,025	44	$227
	NO	4,264	$1,305,943	56	$306
AGE 5 & BLW	YES	1,416	$406,654	19	$287
	NO	6,189	$1,658,314	81	$268
PAY_TYPE	DIRECT	112	$32,335	1	$289
	PROVIDER	7,511	$2,038,501	99	$271
REFUNDS		128	$40,311		$315

AVERAGE HOUSEHOLD SIZE: 3.16

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	2,334	$616,343	31	$264
	FuelOil	644	$198,885	8	$309
	Coal	0	$0	0	$0
	NaturalGas	4,613	$1,246,907	61	$270
	Kerosene	0	$0	0	$0
	Propane	14	$2,833	0	$202
	WoodOrOther	0	$0	0	$0
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	277	$277,000	4	$1,000
	1000 - 1999	73	$72,774	1	$997
	2000 - 2999	67	$62,516	1	$933
	3000 - 3999	69	$53,095	1	$769
	4000 - 4999	74	$50,303	1	$680
	5000 - 5999	82	$44,393	1	$541
	6000 - 6999	74	$34,937	1	$472
	7000 - 7999	83	$33,888	1	$408
	8000 - 8999	110	$40,118	1	$365
	9000 - 9999	129	$40,560	2	$314
	10000 - 10999	171	$46,811	2	$274
	11000 - 11999	630	$149,472	8	$237
	12000 - 12999	777	$160,447	10	$206
	13000 - 13999	305	$61,833	4	$203
	14000 - 14999	360	$72,021	5	$200
	15000 - 15999	335	$67,000	4	$200
	16000 - 16999	322	$64,400	4	$200
	17000 - 17999	379	$75,800	5	$200
	18000 - 18999	352	$70,400	5	$200
	19000 - 19999	328	$65,600	4	$200
	> 19999	2,608	$521,600	34	$200
PAYMENT TYPE	Regular	7,605	$2,064,968		$272
	Reissue	4	$591		$148
	Secondpay	10	$3,113		$311
	Underpay	1	$800		$800
	Extraordinary	3	$1,364		$455
TOTAL PMT		7,623	$2,070,836		$272
RECOUPMENTS		6	$1,274		$212
NET PAID			$2,069,562		
PMT SUB TYPE	APD	0	$0		$0
	STD	7,623	$2,070,836		$272

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	371	$104,516	56	$282
	Renter	202	$57,682	31	$286
	RenterWithHeat	4	$1,600	1	$400
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	74	$27,389	11	$370
	Roomer	0	$0	0	$0
	Other	10	$3,460	2	$346
RACE	AmericanIndian	0	$0	0	$0
	Other	6	$1,284	1	$214
	NativeHawaiian	0	$0	0	$0
	Black	5	$1,137	1	$227
	White	646	$191,343	98	$296
	Asian	0	$0	0	$0
	Unknown	4	$883	1	$221
DISABLED	YES	169	$37,580	26	$222
	NO	492	$157,067	74	$319
AGE 60 & ABV	YES	332	$77,904	50	$235
	NO	329	$116,743	50	$355
AGE 5 & BLW	YES	83	$26,835	13	$323
	NO	578	$167,812	87	$290
PAY_TYPE	DIRECT	8	$2,756	1	$344
	PROVIDER	653	$191,891	99	$294
REFUNDS		30	$5,641		$188

AVERAGE HOUSEHOLD SIZE: 2.76

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	179	$56,658	27	$317
	FuelOil	30	$7,059	5	$235
	Coal	0	$0	0	$0
	NaturalGas	394	$113,102	60	$287
	Kerosene	1	$305	0	$305
	Propane	48	$13,226	7	$276
	WoodOrOther	9	$4,297	1	$477
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	36	$34,416	5	$956
	1000 - 1999	1	$1,000	0	$1,000
	2000 - 2999	5	$5,000	1	$1,000
	3000 - 3999	7	$6,332	1	$905
	4000 - 4999	5	$4,054	1	$811
	5000 - 5999	10	$6,490	2	$649
	6000 - 6999	7	$3,943	1	$563
	7000 - 7999	10	$4,987	2	$499
	8000 - 8999	7	$3,003	1	$429
	9000 - 9999	9	$3,387	1	$376
	10000 - 10999	14	$4,628	2	$331
	11000 - 11999	54	$15,549	8	$288
	12000 - 12999	40	$10,111	6	$253
	13000 - 13999	17	$3,875	3	$228
	14000 - 14999	26	$5,272	4	$203
	15000 - 15999	31	$6,200	5	$200
	16000 - 16999	31	$6,200	5	$200
	17000 - 17999	42	$8,400	6	$200
	18000 - 18999	37	$7,400	6	$200
	19000 - 19999	43	$8,600	7	$200
	> 19999	229	$45,800	35	$200
PAYMENT TYPE	Regular	661	$194,647		$294
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		661	$194,647		$294
RECOUPMENTS		0	$0		$0
NET PAID			$194,647		
PMT SUB TYPE	APD	0	$0		$0
	STD	661	$194,647		$294

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 25

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	2,520	$688,191	34	$273
	Renter	3,878	$1,123,832	53	$290
	RenterWithHeat	82	$22,750	1	$277
	SubsidizedWithHeat	3	$1,400	0	$467
	SubsidizedNoHeat	853	$281,827	12	$330
	Roomer	0	$0	0	$0
	Other	33	$13,181	0	$399
RACE	AmericanIndian	30	$11,441	0	$381
	Other	378	$109,923	5	$291
	NativeHawaiian	8	$4,140	0	$518
	Black	1,386	$420,065	19	$303
	White	5,453	$1,552,385	74	$285
	Asian	51	$14,215	1	$279
	Unknown	63	$19,012	1	$302
DISABLED	YES	2,215	$503,786	30	$227
	NO	5,154	$1,627,395	70	$316
AGE 60 & ABV	YES	2,703	$622,405	37	$230
	NO	4,666	$1,508,776	63	$323
AGE 5 & BLW	YES	1,377	$432,120	19	$314
	NO	5,992	$1,699,061	81	$284
PAY_TYPE	DIRECT	73	$19,774	1	$271
	PROVIDER	7,304	$2,114,214	99	$289
REFUNDS		280	$61,167		$218

AVERAGE HOUSEHOLD SIZE: 3.43

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	2,142	$652,799	29	$305
	FuelOil	55	$14,151	1	$257
	Coal	2	$400	0	$200
	NaturalGas	4,962	$1,401,732	67	$282
	Kerosene	2	$400	0	$200
	Propane	192	$56,404	3	$294
	WoodOrOther	13	$5,095	0	$392
	BlendedFuel	1	$200	0	$200
INCOME RANGE	0 - 999	392	$389,364	5	$993
	1000 - 1999	39	$39,000	1	$1,000
	2000 - 2999	56	$56,000	1	$1,000
	3000 - 3999	53	$45,932	1	$867
	4000 - 4999	57	$44,180	1	$775
	5000 - 5999	54	$33,449	1	$619
	6000 - 6999	70	$37,752	1	$539
	7000 - 7999	82	$38,641	1	$471
	8000 - 8999	100	$41,075	1	$411
	9000 - 9999	130	$46,505	2	$358
	10000 - 10999	164	$51,056	2	$311
	11000 - 11999	610	$165,635	8	$272
	12000 - 12999	759	$179,851	10	$237
	13000 - 13999	300	$62,141	4	$207
	14000 - 14999	321	$64,200	4	$200
	15000 - 15999	313	$62,600	4	$200
	16000 - 16999	325	$65,000	4	$200
	17000 - 17999	316	$63,200	4	$200
	18000 - 18999	330	$66,000	4	$200
	19000 - 19999	289	$57,800	4	$200
	> 19999	2,609	$521,800	35	$200
PAYMENT TYPE	Regular	7,369	$2,131,181		$289
	Reissue	1	$236		$236
	Secondpay	6	$2,534		$422
	Underpay	1	$37		$37
	Extraordinary	0	$0		$0
TOTAL PMT		7,377	$2,133,988		$289
RECOUPMENTS		5	$2,334		$467
NET PAID			$2,131,654		
PMT SUB TYPE	APD	0	$0		$0
	STD	7,377	$2,133,988		$289

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 26

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	3,245	$895,533	47	$276
	Renter	2,811	$838,204	40	$298
	RenterWithHeat	47	$14,607	1	$311
	SubsidizedWithHeat	3	$766	0	$255
	SubsidizedNoHeat	672	$238,972	10	$356
	Roomer	3	$600	0	$200
	Other	197	$71,376	3	$362
RACE	AmericanIndian	12	$5,002	0	$417
	Other	51	$16,144	1	$317
	NativeHawaiian	7	$2,092	0	$299
	Black	447	$143,826	6	$322
	White	6,384	$1,867,536	91	$293
	Asian	10	$3,331	0	$333
	Unknown	67	$22,127	1	$330
DISABLED	YES	2,223	$502,112	32	$226
	NO	4,755	$1,557,946	68	$328
AGE 60 & ABV	YES	3,444	$793,006	49	$230
	NO	3,534	$1,267,052	51	$359
AGE 5 & BLW	YES	867	$293,678	12	$339
	NO	6,111	$1,766,380	88	$289
PAY_TYPE	DIRECT	61	$19,598	1	$321
	PROVIDER	7,021	$2,057,212	99	$293
REFUNDS		252	$52,442		$208

AVERAGE HOUSEHOLD SIZE: 3.36

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	2,081	$644,573	30	$310
	FuelOil	2,249	$677,334	32	$301
	Coal	28	$6,115	0	$218
	NaturalGas	1,898	$531,023	27	$280
	Kerosene	294	$82,351	4	$280
	Propane	352	$98,362	5	$279
	WoodOrOther	69	$18,497	1	$268
	BlendedFuel	7	$1,803	0	$258
INCOME RANGE	0 - 999	399	$395,597	6	$991
	1000 - 1999	60	$60,000	1	$1,000
	2000 - 2999	55	$54,233	1	$986
	3000 - 3999	55	$46,002	1	$836
	4000 - 4999	62	$45,469	1	$733
	5000 - 5999	79	$45,969	1	$582
	6000 - 6999	68	$34,672	1	$510
	7000 - 7999	82	$36,689	1	$447
	8000 - 8999	84	$33,407	1	$398
	9000 - 9999	101	$34,717	1	$344
	10000 - 10999	167	$50,561	2	$303
	11000 - 11999	820	$213,129	12	$260
	12000 - 12999	720	$162,726	10	$226
	13000 - 13999	274	$56,421	4	$206
	14000 - 14999	300	$60,066	4	$200
	15000 - 15999	249	$49,800	4	$200
	16000 - 16999	288	$57,600	4	$200
	17000 - 17999	304	$60,800	4	$200
	18000 - 18999	265	$53,000	4	$200
	19000 - 19999	299	$59,800	4	$200
	> 19999	2,247	$449,400	32	$200
PAYMENT TYPE	Regular	6,978	$2,060,058		$295
	Reissue	3	$300		$100
	Secondpay	94	$15,468		$165
	Underpay	2	$284		$142
	Extraordinary	5	$700		$140
TOTAL PMT		7,082	$2,076,810		$293
RECOUPMENTS		13	$3,087		$237
NET PAID			$2,073,723		
PMT SUB TYPE	APD	0	$0		$0
	STD	7,082	$2,076,810		$293

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 27

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	142	$37,800	67	$266
	Renter	51	$12,983	24	$255
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	16	$3,867	8	$242
	Roomer	0	$0	0	$0
	Other	4	$2,219	2	$555
RACE	AmericanIndian	2	$416	1	$208
	Other	1	$200	0	$200
	NativeHawaiian	0	$0	0	$0
	Black	1	$200	0	$200
	White	206	$55,281	97	$268
	Asian	2	$572	1	$286
	Unknown	1	$200	0	$200
DISABLED	YES	68	$15,552	32	$229
	NO	145	$41,317	68	$285
AGE 60 & ABV	YES	141	$34,558	66	$245
	NO	72	$22,311	34	$310
AGE 5 & BLW	YES	11	$2,345	5	$213
	NO	202	$54,524	95	$270
PAY_TYPE	DIRECT	3	$697	1	$232
	PROVIDER	215	$56,880	99	$265
REFUNDS		10	$1,700		$170

AVERAGE HOUSEHOLD SIZE: 2.2

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	71	$19,700	33	$277
	FuelOil	18	$4,994	8	$277
	Coal	0	$0	0	$0
	NaturalGas	63	$16,666	30	$265
	Kerosene	2	$676	1	$338
	Propane	49	$10,915	23	$223
	WoodOrOther	9	$3,718	4	$413
	BlendedFuel	1	$200	0	$200
INCOME RANGE	0 - 999	3	$3,000	1	$1,000
	1000 - 1999	0	$0	0	$0
	2000 - 2999	1	$1,000	0	$1,000
	3000 - 3999	2	$1,798	1	$899
	4000 - 4999	4	$3,370	2	$842
	5000 - 5999	2	$1,338	1	$669
	6000 - 6999	1	$608	0	$608
	7000 - 7999	3	$1,466	1	$489
	8000 - 8999	3	$1,285	1	$428
	9000 - 9999	5	$1,938	2	$388
	10000 - 10999	4	$1,364	2	$341
	11000 - 11999	10	$2,872	5	$287
	12000 - 12999	28	$7,247	13	$259
	13000 - 13999	10	$2,183	5	$218
	14000 - 14999	9	$1,800	4	$200
	15000 - 15999	9	$1,800	4	$200
	16000 - 16999	12	$2,400	6	$200
	17000 - 17999	13	$2,600	6	$200
	18000 - 18999	9	$1,800	4	$200
	19000 - 19999	13	$2,600	6	$200
	> 19999	72	$14,400	34	$200
PAYMENT TYPE	Regular	213	$56,869		$267
	Reissue	0	$0		$0
	Secondpay	4	$608		$152
	Underpay	0	$0		$0
	Extraordinary	1	$100		$100
TOTAL PMT		218	$57,577		$264
RECOUPMENTS		1	$22		$22
NET PAID			$57,555		
PMT SUB TYPE	APD	0	$0		$0
	STD	218	$57,577		$264

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	943	$257,976	38	$274
	Renter	1,185	$341,508	48	$288
	RenterWithHeat	26	$5,501	1	$212
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	282	$78,427	11	$278
	Roomer	2	$1,200	0	$600
	Other	27	$9,896	1	$367
RACE	AmericanIndian	6	$1,225	0	$204
	Other	138	$44,162	6	$320
	NativeHawaiian	1	$200	0	$200
	Black	171	$49,238	7	$288
	White	2,064	$576,090	84	$279
	Asian	8	$2,535	0	$317
	Unknown	77	$21,058	3	$273
DISABLED	YES	652	$147,648	26	$226
	NO	1,813	$546,860	74	$302
AGE 60 & ABV	YES	1,174	$266,494	48	$227
	NO	1,291	$428,014	52	$332
AGE 5 & BLW	YES	380	$115,365	15	$304
	NO	2,085	$579,143	85	$278
PAY_TYPE	DIRECT	50	$14,992	2	$300
	PROVIDER	2,427	$682,946	98	$281
REFUNDS		94	$15,153		$161

AVERAGE HOUSEHOLD SIZE: 2.93

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	1,499	$427,092	61	$285
	FuelOil	513	$149,404	21	$291
	Coal	0	$0	0	$0
	NaturalGas	259	$68,027	11	$263
	Kerosene	62	$17,450	3	$281
	Propane	116	$27,620	5	$238
	WoodOrOther	16	$4,915	1	$307
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	129	$127,891	5	$991
	1000 - 1999	9	$9,000	0	$1,000
	2000 - 2999	16	$15,805	1	$988
	3000 - 3999	20	$16,657	1	$833
	4000 - 4999	14	$10,668	1	$762
	5000 - 5999	23	$14,891	1	$647
	6000 - 6999	15	$7,729	1	$515
	7000 - 7999	19	$8,547	1	$450
	8000 - 8999	33	$14,399	1	$436
	9000 - 9999	41	$14,873	2	$363
	10000 - 10999	53	$15,676	2	$296
	11000 - 11999	160	$42,777	6	$267
	12000 - 12999	197	$45,662	8	$232
	13000 - 13999	108	$23,470	4	$217
	14000 - 14999	124	$25,589	5	$206
	15000 - 15999	103	$20,674	4	$201
	16000 - 16999	127	$25,400	5	$200
	17000 - 17999	121	$24,200	5	$200
	18000 - 18999	119	$23,800	5	$200
	19000 - 19999	149	$29,800	6	$200
	> 19999	885	$177,000	36	$200
PAYMENT TYPE	Regular	2,465	$694,508		$282
	Reissue	3	$1,200		$400
	Secondpay	6	$834		$139
	Underpay	3	$1,396		$465
	Extraordinary	0	$0		$0
TOTAL PMT		2,477	$697,938		$282
RECOUPMENTS		1	$134		$134
NET PAID			$697,804		
PMT SUB TYPE	APD	0	$0		$0
	STD	2,477	$697,938		$282

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	215	$61,112	40	$284
	Renter	242	$72,662	45	$300
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	68	$20,018	13	$294
	Roomer	0	$0	0	$0
	Other	15	$5,595	3	$373
RACE	AmericanIndian	1	$263	0	$263
	Other	6	$2,909	1	$485
	NativeHawaiian	0	$0	0	$0
	Black	20	$5,331	4	$267
	White	510	$149,471	94	$293
	Asian	0	$0	0	$0
	Unknown	3	$1,413	1	$471
DISABLED	YES	161	$36,577	30	$227
	NO	379	$122,810	70	$324
AGE 60 & ABV	YES	280	$65,410	52	$234
	NO	260	$93,977	48	$361
AGE 5 & BLW	YES	77	$23,565	14	$306
	NO	463	$135,822	86	$293
PAY_TYPE	DIRECT	9	$2,950	2	$328
	PROVIDER	535	$157,138	98	$294
REFUNDS		8	$1,550		$194

AVERAGE HOUSEHOLD SIZE: 2.9

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	225	$67,807	42	$301
	FuelOil	243	$70,936	45	$292
	Coal	2	$473	0	$236
	NaturalGas	0	$0	0	$0
	Kerosene	12	$4,838	2	$403
	Propane	36	$9,773	7	$271
	WoodOrOther	22	$5,560	4	$253
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	34	$34,000	6	$1,000
	1000 - 1999	3	$3,000	1	$1,000
	2000 - 2999	6	$5,916	1	$986
	3000 - 3999	1	$780	0	$780
	4000 - 4999	4	$2,791	1	$698
	5000 - 5999	9	$5,831	2	$648
	6000 - 6999	6	$3,140	1	$523
	7000 - 7999	2	$844	0	$422
	8000 - 8999	4	$1,553	1	$388
	9000 - 9999	8	$2,732	1	$342
	10000 - 10999	11	$3,545	2	$322
	11000 - 11999	36	$9,581	7	$266
	12000 - 12999	61	$14,386	11	$236
	13000 - 13999	18	$3,882	3	$216
	14000 - 14999	28	$5,606	5	$200
	15000 - 15999	23	$4,600	4	$200
	16000 - 16999	29	$5,800	5	$200
	17000 - 17999	24	$4,800	4	$200
	18000 - 18999	34	$6,800	6	$200
	19000 - 19999	21	$4,200	4	$200
	> 19999	178	$35,600	33	$200
PAYMENT TYPE	Regular	540	$159,387		$295
	Reissue	2	$401		$200
	Secondpay	2	$300		$150
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		544	$160,088		$294
RECOUPMENTS		8	$2,466		$308
NET PAID			$157,622		
PMT SUB TYPE	APD	0	$0		$0
	STD	544	$160,088		$294

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	599	$177,462	46	$296
	Renter	534	$173,784	41	$325
	RenterWithHeat	2	$1,175	0	$588
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	132	$41,740	10	$316
	Roomer	1	$246	0	$246
	Other	32	$10,230	2	$320
RACE	AmericanIndian	1	$200	0	$200
	Other	6	$2,087	0	$348
	NativeHawaiian	0	$0	0	$0
	Black	12	$2,685	1	$224
	White	1,274	$397,465	98	$312
	Asian	2	$400	0	$200
	Unknown	5	$1,800	0	$360
DISABLED	YES	430	$98,502	33	$229
	NO	870	$306,135	67	$352
AGE 60 & ABV	YES	644	$153,680	50	$239
	NO	656	$250,957	50	$383
AGE 5 & BLW	YES	151	$53,160	12	$352
	NO	1,149	$351,477	88	$306
PAY_TYPE	DIRECT	13	$5,012	1	$386
	PROVIDER	1,293	$400,684	99	$310
REFUNDS		35	$7,748		$221

AVERAGE HOUSEHOLD SIZE: 3.12

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	506	$161,452	39	$319
	FuelOil	296	$98,098	23	$331
	Coal	1	$200	0	$200
	NaturalGas	335	$92,352	26	$276
	Kerosene	35	$11,248	3	$321
	Propane	112	$35,591	9	$318
	WoodOrOther	14	$4,696	1	$335
	BlendedFuel	1	$1,000	0	$1,000
INCOME RANGE	0 - 999	94	$94,000	7	$1,000
	1000 - 1999	16	$16,000	1	$1,000
	2000 - 2999	7	$6,854	1	$979
	3000 - 3999	13	$11,271	1	$867
	4000 - 4999	12	$9,164	1	$764
	5000 - 5999	13	$7,615	1	$586
	6000 - 6999	14	$7,264	1	$519
	7000 - 7999	11	$5,013	1	$456
	8000 - 8999	16	$6,238	1	$390
	9000 - 9999	14	$4,953	1	$354
	10000 - 10999	33	$10,195	3	$309
	11000 - 11999	153	$40,448	12	$264
	12000 - 12999	131	$30,271	10	$231
	13000 - 13999	52	$11,024	4	$212
	14000 - 14999	60	$12,127	5	$202
	15000 - 15999	57	$11,400	4	$200
	16000 - 16999	44	$8,800	3	$200
	17000 - 17999	60	$12,000	5	$200
	18000 - 18999	44	$8,800	3	$200
	19000 - 19999	49	$9,800	4	$200
	> 19999	407	$81,400	31	$200
PAYMENT TYPE	Regular	1,300	$404,637		$311
	Reissue	0	$0		$0
	Secondpay	6	$1,059		$176
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,306	$405,696		$311
RECOUPMENTS		4	$759		$190
NET PAID			$404,937		
PMT SUB TYPE	APD	0	$0		$0
	STD	1,306	$405,696		$311

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	741	$188,438	52	$254
	Renter	533	$161,653	38	$303
	RenterWithHeat	16	$5,237	1	$327
	SubsidizedWithHeat	1	$329	0	$329
	SubsidizedNoHeat	66	$17,812	5	$270
	Roomer	2	$526	0	$263
	Other	60	$20,328	4	$339
RACE	AmericanIndian	0	$0	0	$0
	Other	16	$5,729	1	$358
	NativeHawaiian	2	$1,508	0	$754
	Black	45	$15,269	3	$339
	White	1,345	$368,817	95	$274
	Asian	1	$200	0	$200
	Unknown	10	$2,800	1	$280
DISABLED	YES	346	$75,797	24	$219
	NO	1,073	$318,526	76	$297
AGE 60 & ABV	YES	749	$169,461	53	$226
	NO	670	$224,862	47	$336
AGE 5 & BLW	YES	202	$57,519	14	$285
	NO	1,217	$336,804	86	$277
PAY_TYPE	DIRECT	25	$9,115	2	$365
	PROVIDER	1,403	$388,111	98	$277
REFUNDS		30	$5,629		$188

AVERAGE HOUSEHOLD SIZE: 3.03

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	314	$88,496	22	$282
	FuelOil	893	$244,200	63	$273
	Coal	22	$5,050	2	$230
	NaturalGas	68	$19,139	5	$281
	Kerosene	12	$3,506	1	$292
	Propane	59	$18,791	4	$318
	WoodOrOther	51	$15,141	4	$297
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	78	$78,000	5	$1,000
	1000 - 1999	5	$5,000	0	$1,000
	2000 - 2999	6	$5,824	0	$971
	3000 - 3999	7	$6,037	0	$862
	4000 - 4999	8	$6,179	1	$772
	5000 - 5999	4	$2,554	0	$638
	6000 - 6999	16	$8,790	1	$549
	7000 - 7999	13	$6,254	1	$481
	8000 - 8999	15	$6,264	1	$418
	9000 - 9999	12	$4,368	1	$364
	10000 - 10999	17	$5,399	1	$318
	11000 - 11999	97	$26,318	7	$271
	12000 - 12999	123	$29,259	9	$238
	13000 - 13999	52	$10,835	4	$208
	14000 - 14999	56	$11,236	4	$201
	15000 - 15999	80	$16,006	6	$200
	16000 - 16999	79	$15,800	6	$200
	17000 - 17999	68	$13,600	5	$200
	18000 - 18999	76	$15,200	5	$200
	19000 - 19999	67	$13,400	5	$200
	> 19999	540	$108,000	38	$200
PAYMENT TYPE	Regular	1,419	$394,323		$278
	Reissue	1	$553		$553
	Secondpay	8	$2,350		$294
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,428	$397,226		$278
RECOUPMENTS		12	$2,983		$249
NET PAID			$394,243		
PMT SUB TYPE	APD	0	$0		$0
	STD	1,428	$397,226		$278

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,147	$318,434	46	$278
	Renter	1,080	$315,831	43	$292
	RenterWithHeat	27	$6,548	1	$243
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	188	$54,451	8	$290
	Roomer	4	$1,706	0	$426
	Other	45	$16,851	2	$374
RACE	AmericanIndian	5	$1,156	0	$231
	Other	34	$11,389	1	$335
	NativeHawaiian	3	$1,587	0	$529
	Black	62	$18,776	2	$303
	White	2,356	$672,024	95	$285
	Asian	8	$2,556	0	$320
	Unknown	23	$6,333	1	$275
DISABLED	YES	839	$193,886	34	$231
	NO	1,652	$519,935	66	$315
AGE 60 & ABV	YES	1,158	$278,993	46	$241
	NO	1,333	$434,828	54	$326
AGE 5 & BLW	YES	313	$91,489	13	$292
	NO	2,178	$622,332	87	$286
PAY_TYPE	DIRECT	58	$19,329	2	$333
	PROVIDER	2,471	$703,746	98	$285
REFUNDS		100	$26,551		$266

AVERAGE HOUSEHOLD SIZE: 3.07

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	810	$247,177	33	$305
	FuelOil	612	$176,095	25	$288
	Coal	24	$6,127	1	$255
	NaturalGas	632	$173,640	25	$275
	Kerosene	139	$35,237	6	$254
	Propane	208	$55,881	8	$269
	WoodOrOther	29	$9,598	1	$331
	BlendedFuel	37	$10,066	1	$272
INCOME RANGE	0 - 999	139	$138,581	6	$997
	1000 - 1999	14	$14,000	1	$1,000
	2000 - 2999	20	$20,000	1	$1,000
	3000 - 3999	16	$13,537	1	$846
	4000 - 4999	15	$11,429	1	$762
	5000 - 5999	11	$6,763	0	$615
	6000 - 6999	16	$8,269	1	$517
	7000 - 7999	33	$15,189	1	$460
	8000 - 8999	31	$12,424	1	$401
	9000 - 9999	32	$11,109	1	$347
	10000 - 10999	50	$15,249	2	$305
	11000 - 11999	235	$63,006	9	$268
	12000 - 12999	241	$56,133	10	$233
	13000 - 13999	92	$18,932	4	$206
	14000 - 14999	106	$21,200	4	$200
	15000 - 15999	93	$18,600	4	$200
	16000 - 16999	103	$20,600	4	$200
	17000 - 17999	107	$21,400	4	$200
	18000 - 18999	112	$22,400	4	$200
	19000 - 19999	110	$22,000	4	$200
	> 19999	915	$183,000	37	$200
PAYMENT TYPE	Regular	2,491	$713,821		$287
	Reissue	0	$0		$0
	Secondpay	38	$9,254		$244
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		2,529	$723,075		$286
RECOUPMENTS		14	$3,374		$241
NET PAID			$719,701		
PMT SUB TYPE	APD	0	$0		$0
	STD	2,529	$723,075		$286

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	704	$196,029	54	$278
	Renter	454	$130,092	35	$287
	RenterWithHeat	7	$1,576	1	$225
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	122	$37,214	9	$305
	Roomer	0	$0	0	$0
	Other	27	$8,188	2	$303
RACE	AmericanIndian	4	$1,600	0	$400
	Other	8	$3,779	1	$472
	NativeHawaiian	0	$0	0	$0
	Black	12	$4,355	1	$363
	White	1,285	$362,365	98	$282
	Asian	0	$0	0	$0
	Unknown	5	$1,000	0	$200
DISABLED	YES	380	$86,480	29	$228
	NO	934	$286,619	71	$307
AGE 60 & ABV	YES	674	$158,074	51	$235
	NO	640	$215,025	49	$336
AGE 5 & BLW	YES	164	$49,466	12	$302
	NO	1,150	$323,633	88	$281
PAY_TYPE	DIRECT	10	$3,771	1	$377
	PROVIDER	1,314	$371,514	99	$283
REFUNDS		41	$6,940		$169

AVERAGE HOUSEHOLD SIZE: 2.93

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	334	$106,017	25	$317
	FuelOil	104	$30,219	8	$291
	Coal	2	$400	0	$200
	NaturalGas	745	$199,725	57	$268
	Kerosene	1	$395	0	$395
	Propane	124	$34,649	9	$279
	WoodOrOther	4	$1,694	0	$424
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	69	$66,600	5	$965
	1000 - 1999	6	$6,000	0	$1,000
	2000 - 2999	7	$7,000	1	$1,000
	3000 - 3999	12	$10,366	1	$864
	4000 - 4999	10	$8,076	1	$808
	5000 - 5999	8	$5,077	1	$635
	6000 - 6999	10	$5,530	1	$553
	7000 - 7999	13	$6,112	1	$470
	8000 - 8999	15	$6,337	1	$422
	9000 - 9999	17	$6,022	1	$354
	10000 - 10999	23	$7,230	2	$314
	11000 - 11999	106	$29,274	8	$276
	12000 - 12999	121	$29,289	9	$242
	13000 - 13999	56	$11,881	4	$212
	14000 - 14999	60	$12,105	5	$202
	15000 - 15999	46	$9,200	4	$200
	16000 - 16999	58	$11,600	4	$200
	17000 - 17999	64	$12,800	5	$200
	18000 - 18999	56	$11,200	4	$200
	19000 - 19999	56	$11,200	4	$200
	> 19999	501	$100,200	38	$200
PAYMENT TYPE	Regular	1,314	$373,099		$284
	Reissue	0	$0		$0
	Secondpay	9	$1,986		$221
	Underpay	0	$0		$0
	Extraordinary	1	$200		$200
TOTAL PMT		1,324	$375,285		$283
RECOUPMENTS		1	$114		$114
NET PAID			$375,171		
PMT SUB TYPE	APD	0	$0		$0
	STD	1,324	$375,285		$283

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	276	$73,322	40	$266
	Renter	314	$83,418	45	$266
	RenterWithHeat	1	$200	0	$200
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	79	$22,191	11	$281
	Roomer	1	$200	0	$200
	Other	21	$6,615	3	$315
RACE	AmericanIndian	1	$282	0	$282
	Other	28	$11,574	4	$413
	NativeHawaiian	0	$0	0	$0
	Black	8	$1,657	1	$207
	White	647	$169,080	93	$261
	Asian	1	$1,000	0	$1,000
	Unknown	7	$2,353	1	$336
DISABLED	YES	190	$41,651	27	$219
	NO	502	$144,295	73	$287
AGE 60 & ABV	YES	371	$84,554	54	$228
	NO	321	$101,392	46	$316
AGE 5 & BLW	YES	101	$31,184	15	$309
	NO	591	$154,762	85	$262
PAY_TYPE	DIRECT	21	$7,553	3	$360
	PROVIDER	678	$180,941	97	$267
REFUNDS		25	$5,362		$214

AVERAGE HOUSEHOLD SIZE: 2.87

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	246	$65,947	36	$268
	FuelOil	338	$88,921	49	$263
	Coal	0	$0	0	$0
	NaturalGas	0	$0	0	$0
	Kerosene	4	$1,600	1	$400
	Propane	82	$22,444	12	$274
	WoodOrOther	22	$7,034	3	$320
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	24	$23,200	3	$967
	1000 - 1999	6	$6,000	1	$1,000
	2000 - 2999	7	$6,874	1	$982
	3000 - 3999	4	$3,550	1	$888
	4000 - 4999	3	$2,157	0	$719
	5000 - 5999	8	$4,819	1	$602
	6000 - 6999	5	$2,741	1	$548
	7000 - 7999	6	$2,690	1	$448
	8000 - 8999	5	$2,117	1	$423
	9000 - 9999	9	$3,105	1	$345
	10000 - 10999	10	$3,147	1	$315
	11000 - 11999	40	$10,612	6	$265
	12000 - 12999	49	$11,479	7	$234
	13000 - 13999	30	$6,253	4	$208
	14000 - 14999	31	$6,202	4	$200
	15000 - 15999	36	$7,200	5	$200
	16000 - 16999	44	$8,800	6	$200
	17000 - 17999	33	$6,600	5	$200
	18000 - 18999	38	$7,600	5	$200
	19000 - 19999	51	$10,200	7	$200
	> 19999	253	$50,600	37	$200
PAYMENT TYPE	Regular	692	$185,946		$269
	Reissue	1	$200		$200
	Secondpay	6	$2,348		$391
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		699	$188,494		$270
RECOUPMENTS		1	$200		$200
NET PAID			$188,294		
PMT SUB TYPE	APD	0	$0		$0
	STD	699	$188,494		$270

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,782	$473,472	38	$266
	Renter	2,183	$609,845	46	$279
	RenterWithHeat	102	$29,405	2	$288
	SubsidizedWithHeat	3	$600	0	$200
	SubsidizedNoHeat	538	$163,537	11	$304
	Roomer	60	$15,988	1	$266
	Other	66	$22,464	1	$340
RACE	AmericanIndian	11	$5,580	0	$507
	Other	366	$104,639	8	$286
	NativeHawaiian	11	$3,067	0	$279
	Black	382	$119,478	8	$313
	White	3,748	$1,022,290	79	$273
	Asian	40	$12,029	1	$301
	Unknown	176	$48,228	4	$274
DISABLED	YES	1,307	$298,602	28	$228
	NO	3,427	$1,016,709	72	$297
AGE 60 & ABV	YES	2,210	$515,645	47	$233
	NO	2,524	$799,666	53	$317
AGE 5 & BLW	YES	758	$223,458	16	$295
	NO	3,976	$1,091,853	84	$275
PAY_TYPE	DIRECT	157	$43,913	3	$280
	PROVIDER	4,601	$1,276,543	97	$277
REFUNDS		114	$20,520		$180

AVERAGE HOUSEHOLD SIZE: 2.93

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	1,601	$460,549	34	$288
	FuelOil	475	$131,388	10	$277
	Coal	17	$4,490	0	$264
	NaturalGas	2,361	$638,828	50	$271
	Kerosene	22	$6,050	0	$275
	Propane	238	$68,121	5	$286
	WoodOrOther	10	$2,806	0	$281
	BlendedFuel	10	$3,079	0	$308
INCOME RANGE	0 - 999	154	$154,000	3	$1,000
	1000 - 1999	22	$22,000	0	$1,000
	2000 - 2999	30	$30,000	1	$1,000
	3000 - 3999	29	$26,591	1	$917
	4000 - 4999	43	$35,200	1	$819
	5000 - 5999	36	$23,608	1	$656
	6000 - 6999	41	$23,843	1	$582
	7000 - 7999	67	$33,847	1	$505
	8000 - 8999	59	$25,889	1	$439
	9000 - 9999	89	$33,844	2	$380
	10000 - 10999	101	$33,689	2	$334
	11000 - 11999	360	$104,189	8	$289
	12000 - 12999	440	$111,298	9	$253
	13000 - 13999	192	$42,378	4	$221
	14000 - 14999	199	$40,465	4	$203
	15000 - 15999	218	$43,670	5	$200
	16000 - 16999	231	$46,200	5	$200
	17000 - 17999	222	$44,400	5	$200
	18000 - 18999	229	$45,800	5	$200
	19000 - 19999	201	$40,200	4	$200
	> 19999	1,771	$354,200	37	$200
PAYMENT TYPE	Regular	4,734	$1,315,311		$278
	Reissue	2	$448		$224
	Secondpay	21	$3,913		$186
	Underpay	1	$784		$784
	Extraordinary	0	$0		$0
TOTAL PMT		4,758	$1,320,456		$278
RECOUPMENTS		4	$500		$125
NET PAID			$1,319,956		
PMT SUB TYPE	APD	0	$0		$0
	STD	4,758	$1,320,456		$278

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,395	$353,003	29	$253
	Renter	2,789	$720,991	58	$259
	RenterWithHeat	113	$25,679	2	$227
	SubsidizedWithHeat	1	$200	0	$200
	SubsidizedNoHeat	516	$154,213	11	$299
	Roomer	4	$1,392	0	$348
	Other	30	$9,475	1	$316
RACE	AmericanIndian	18	$6,388	0	$355
	Other	1,032	$261,129	21	$253
	NativeHawaiian	10	$2,680	0	$268
	Black	538	$145,332	11	$270
	White	2,981	$776,679	61	$261
	Asian	71	$20,857	1	$294
	Unknown	198	$51,888	4	$262
DISABLED	YES	1,199	$259,059	25	$216
	NO	3,649	$1,005,894	75	$276
AGE 60 & ABV	YES	1,998	$446,339	41	$223
	NO	2,850	$818,614	59	$287
AGE 5 & BLW	YES	918	$251,425	19	$274
	NO	3,930	$1,013,528	81	$258
PAY_TYPE	DIRECT	94	$22,091	2	$235
	PROVIDER	4,790	$1,249,930	98	$261
REFUNDS		158	$23,877		$151

AVERAGE HOUSEHOLD SIZE: 3.43

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	2,629	$694,441	54	$264
	FuelOil	832	$218,630	17	$263
	Coal	5	$1,000	0	$200
	NaturalGas	998	$256,184	21	$257
	Kerosene	12	$4,167	0	$347
	Propane	371	$90,331	8	$243
	WoodOrOther	1	$200	0	$200
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	169	$167,400	3	$991
	1000 - 1999	26	$25,929	1	$997
	2000 - 2999	38	$35,381	1	$931
	3000 - 3999	25	$19,018	1	$761
	4000 - 4999	34	$23,758	1	$699
	5000 - 5999	40	$21,548	1	$539
	6000 - 6999	45	$21,959	1	$488
	7000 - 7999	57	$23,471	1	$412
	8000 - 8999	61	$22,834	1	$374
	9000 - 9999	83	$26,184	2	$315
	10000 - 10999	79	$22,165	2	$281
	11000 - 11999	297	$71,939	6	$242
	12000 - 12999	336	$70,933	7	$211
	13000 - 13999	193	$39,328	4	$204
	14000 - 14999	203	$40,706	4	$201
	15000 - 15999	210	$42,000	4	$200
	16000 - 16999	222	$44,400	5	$200
	17000 - 17999	211	$42,200	4	$200
	18000 - 18999	226	$45,200	5	$200
	19000 - 19999	256	$51,200	5	$200
	> 19999	2,037	$407,400	42	$200
PAYMENT TYPE	Regular	4,848	$1,264,953		$261
	Reissue	11	$2,133		$194
	Secondpay	24	$4,911		$205
	Underpay	1	$24		$24
	Extraordinary	0	$0		$0
TOTAL PMT		4,884	$1,272,021		$260
RECOUPMENTS		4	$700		$175
NET PAID			$1,271,321		
PMT SUB TYPE	APD	0	$0		$0
	STD	4,884	$1,272,021		$260

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,357	$350,156	53	$258
	Renter	1,040	$303,302	40	$292
	RenterWithHeat	15	$4,518	1	$301
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	111	$32,983	4	$297
	Roomer	1	$224	0	$224
	Other	60	$24,175	2	$403
RACE	AmericanIndian	10	$3,128	0	$313
	Other	32	$8,876	1	$277
	NativeHawaiian	1	$393	0	$393
	Black	256	$80,039	10	$313
	White	2,268	$619,175	88	$273
	Asian	2	$400	0	$200
	Unknown	15	$3,347	1	$223
DISABLED	YES	712	$160,073	28	$225
	NO	1,872	$555,285	72	$297
AGE 60 & ABV	YES	1,251	$287,453	48	$230
	NO	1,333	$427,905	52	$321
AGE 5 & BLW	YES	310	$99,168	12	$320
	NO	2,274	$616,190	88	$271
PAY_TYPE	DIRECT	20	$7,127	1	$356
	PROVIDER	2,573	$710,508	99	$276
REFUNDS		95	$24,499		$258

AVERAGE HOUSEHOLD SIZE: 2.98

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	857	$249,044	33	$291
	FuelOil	331	$99,895	13	$302
	Coal	2	$400	0	$200
	NaturalGas	1,202	$312,345	47	$260
	Kerosene	41	$10,038	2	$245
	Propane	110	$31,031	4	$282
	WoodOrOther	7	$2,111	0	$302
	BlendedFuel	34	$10,494	1	$309
INCOME RANGE	0 - 999	104	$104,000	4	$1,000
	1000 - 1999	7	$7,000	0	$1,000
	2000 - 2999	17	$16,954	1	$997
	3000 - 3999	24	$20,014	1	$834
	4000 - 4999	16	$12,184	1	$762
	5000 - 5999	23	$14,110	1	$613
	6000 - 6999	33	$17,618	1	$534
	7000 - 7999	34	$15,502	1	$456
	8000 - 8999	36	$14,944	1	$415
	9000 - 9999	32	$11,431	1	$357
	10000 - 10999	58	$18,176	2	$313
	11000 - 11999	190	$51,502	7	$271
	12000 - 12999	230	$54,537	9	$237
	13000 - 13999	104	$21,510	4	$207
	14000 - 14999	120	$24,559	5	$205
	15000 - 15999	107	$21,517	4	$201
	16000 - 16999	134	$26,800	5	$200
	17000 - 17999	136	$27,200	5	$200
	18000 - 18999	114	$22,800	4	$200
	19000 - 19999	105	$21,000	4	$200
	> 19999	960	$192,000	37	$200
PAYMENT TYPE	Regular	2,584	$715,358		$277
	Reissue	1	$100		$100
	Secondpay	6	$2,048		$341
	Underpay	1	$29		$29
	Extraordinary	1	$100		$100
TOTAL PMT		2,593	$717,635		$277
RECOUPMENTS		1	$100		$100
NET PAID			$717,535		
PMT SUB TYPE	APD	0	$0		$0
	STD	2,593	$717,635		$277

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 38

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	727	$187,949	34	$259
	Renter	1,175	$308,863	55	$263
	RenterWithHeat	41	$10,473	2	$255
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	180	$56,598	8	$314
	Roomer	0	$0	0	$0
	Other	10	$3,043	0	$304
RACE	AmericanIndian	6	$2,055	0	$342
	Other	518	$142,931	24	$276
	NativeHawaiian	2	$400	0	$200
	Black	106	$30,196	5	$285
	White	1,426	$371,539	67	$261
	Asian	11	$3,167	1	$288
	Unknown	64	$16,638	3	$260
DISABLED	YES	473	$101,072	22	$214
	NO	1,660	$465,854	78	$281
AGE 60 & ABV	YES	864	$195,894	41	$227
	NO	1,269	$371,032	59	$292
AGE 5 & BLW	YES	475	$127,480	22	$268
	NO	1,658	$439,446	78	$265
PAY_TYPE	DIRECT	56	$15,470	3	$276
	PROVIDER	2,079	$551,756	97	$265
REFUNDS		51	$8,742		$171

AVERAGE HOUSEHOLD SIZE: 3.53

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	854	$237,535	40	$278
	FuelOil	619	$161,007	29	$260
	Coal	2	$464	0	$232
	NaturalGas	510	$127,212	24	$249
	Kerosene	11	$2,830	1	$257
	Propane	130	$34,864	6	$268
	WoodOrOther	7	$3,014	0	$431
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	75	$74,200	4	$989
	1000 - 1999	16	$16,000	1	$1,000
	2000 - 2999	18	$17,765	1	$987
	3000 - 3999	14	$11,409	1	$815
	4000 - 4999	10	$7,306	0	$731
	5000 - 5999	15	$8,853	1	$590
	6000 - 6999	27	$13,444	1	$498
	7000 - 7999	15	$6,617	1	$441
	8000 - 8999	25	$9,614	1	$385
	9000 - 9999	31	$10,531	1	$340
	10000 - 10999	35	$10,094	2	$288
	11000 - 11999	138	$34,966	6	$253
	12000 - 12999	144	$31,778	7	$221
	13000 - 13999	79	$16,141	4	$204
	14000 - 14999	73	$14,608	3	$200
	15000 - 15999	89	$17,800	4	$200
	16000 - 16999	110	$22,000	5	$200
	17000 - 17999	91	$18,200	4	$200
	18000 - 18999	100	$20,000	5	$200
	19000 - 19999	95	$19,000	4	$200
	> 19999	933	$186,600	44	$200
PAYMENT TYPE	Regular	2,133	$566,926		$266
	Reissue	1	$100		$100
	Secondpay	1	$200		$200
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		2,135	$567,226		$266
RECOUPMENTS		0	$0		$0
NET PAID			$567,226		
PMT SUB TYPE	APD	0	$0		$0
	STD	2,135	$567,226		$266

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 39

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,493	$378,714	28	$254
	Renter	2,786	$738,988	53	$265
	RenterWithHeat	51	$11,326	1	$222
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	874	$248,438	17	$284
	Roomer	6	$1,602	0	$267
	Other	37	$13,810	1	$373
RACE	AmericanIndian	9	$1,974	0	$219
	Other	772	$200,843	15	$260
	NativeHawaiian	24	$6,353	0	$265
	Black	627	$182,692	12	$291
	White	3,558	$936,506	68	$263
	Asian	67	$16,020	1	$239
	Unknown	190	$48,490	4	$255
DISABLED	YES	1,303	$283,662	25	$218
	NO	3,944	$1,109,216	75	$281
AGE 60 & ABV	YES	2,125	$483,648	40	$228
	NO	3,122	$909,230	60	$291
AGE 5 & BLW	YES	1,063	$291,721	20	$274
	NO	4,184	$1,101,157	80	$263
PAY_TYPE	DIRECT	27	$6,635	1	$246
	PROVIDER	5,246	$1,392,137	99	$265
REFUNDS		133	$22,551		$170

AVERAGE HOUSEHOLD SIZE: 3.28

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	3,135	$832,896	60	$266
	FuelOil	808	$213,059	15	$264
	Coal	2	$400	0	$200
	NaturalGas	1,187	$318,672	23	$268
	Kerosene	33	$7,345	1	$223
	Propane	79	$19,720	2	$250
	WoodOrOther	3	$786	0	$262
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	191	$189,400	4	$992
	1000 - 1999	41	$41,000	1	$1,000
	2000 - 2999	35	$34,416	1	$983
	3000 - 3999	26	$20,616	0	$793
	4000 - 4999	34	$24,238	1	$713
	5000 - 5999	40	$22,636	1	$566
	6000 - 6999	42	$20,882	1	$497
	7000 - 7999	51	$22,335	1	$438
	8000 - 8999	74	$27,953	1	$378
	9000 - 9999	74	$24,299	1	$328
	10000 - 10999	102	$29,252	2	$287
	11000 - 11999	408	$101,541	8	$249
	12000 - 12999	464	$100,822	9	$217
	13000 - 13999	221	$44,553	4	$202
	14000 - 14999	217	$43,535	4	$201
	15000 - 15999	223	$44,600	4	$200
	16000 - 16999	206	$41,200	4	$200
	17000 - 17999	238	$47,600	5	$200
	18000 - 18999	239	$47,800	5	$200
	19000 - 19999	242	$48,400	5	$200
	> 19999	2,079	$415,800	40	$200
PAYMENT TYPE	Regular	5,247	$1,392,878		$265
	Reissue	1	$100		$100
	Secondpay	22	$4,374		$199
	Underpay	1	$220		$220
	Extraordinary	2	$1,200		$600
TOTAL PMT		5,273	$1,398,772		$265
RECOUPMENTS		10	$1,537		$154
NET PAID			$1,397,235		
PMT SUB TYPE	APD	0	$0		$0
	STD	5,273	$1,398,772		$265

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	3,604	$977,539	39	$271
	Renter	4,430	$1,321,623	48	$298
	RenterWithHeat	88	$23,591	1	$268
	SubsidizedWithHeat	2	$740	0	$370
	SubsidizedNoHeat	1,003	$375,771	11	$375
	Roomer	7	$2,291	0	$327
	Other	131	$46,303	1	$353
RACE	AmericanIndian	21	$6,097	0	$290
	Other	1,516	$463,411	16	$306
	NativeHawaiian	41	$11,159	0	$272
	Black	712	$251,817	8	$354
	White	6,766	$1,954,508	73	$289
	Asian	29	$8,294	0	$286
	Unknown	180	$52,572	2	$292
DISABLED	YES	2,115	$499,587	23	$236
	NO	7,150	$2,248,271	77	$314
AGE 60 & ABV	YES	4,019	$969,086	43	$241
	NO	5,246	$1,778,772	57	$339
AGE 5 & BLW	YES	1,716	$543,844	19	$317
	NO	7,549	$2,204,014	81	$292
PAY_TYPE	DIRECT	121	$34,255	1	$283
	PROVIDER	9,193	$2,722,718	99	$296
REFUNDS		183	$31,027		$170

AVERAGE HOUSEHOLD SIZE: 2.99

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	3,036	$965,145	33	$318
	FuelOil	1,822	$528,117	20	$290
	Coal	103	$29,285	1	$284
	NaturalGas	3,698	$1,051,685	40	$284
	Kerosene	50	$14,499	1	$290
	Propane	516	$147,030	6	$285
	WoodOrOther	7	$1,665	0	$238
	BlendedFuel	33	$10,432	0	$316
INCOME RANGE	0 - 999	402	$399,500	4	$994
	1000 - 1999	90	$90,000	1	$1,000
	2000 - 2999	81	$80,958	1	$999
	3000 - 3999	97	$89,301	1	$921
	4000 - 4999	78	$64,666	1	$829
	5000 - 5999	75	$50,341	1	$671
	6000 - 6999	113	$66,096	1	$585
	7000 - 7999	123	$62,962	1	$512
	8000 - 8999	110	$49,064	1	$446
	9000 - 9999	163	$63,394	2	$389
	10000 - 10999	201	$69,075	2	$344
	11000 - 11999	675	$198,491	7	$294
	12000 - 12999	720	$184,493	8	$256
	13000 - 13999	387	$87,035	4	$225
	14000 - 14999	418	$85,967	5	$206
	15000 - 15999	456	$91,315	5	$200
	16000 - 16999	405	$81,000	4	$200
	17000 - 17999	432	$86,400	5	$200
	18000 - 18999	425	$85,000	5	$200
	19000 - 19999	434	$86,800	5	$200
	> 19999	3,380	$676,000	36	$200
PAYMENT TYPE	Regular	9,265	$2,747,858		$297
	Reissue	20	$2,192		$110
	Secondpay	27	$6,795		$252
	Underpay	2	$128		$64
	Extraordinary	0	$0		$0
TOTAL PMT		9,314	$2,756,973		$296
RECOUPMENTS		16	$2,232		$140
NET PAID			$2,754,741		
PMT SUB TYPE	APD	0	$0		$0
	STD	9,314	$2,756,973		$296

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 41

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,147	$296,426	34	$258
	Renter	1,680	$471,415	50	$281
	RenterWithHeat	92	$22,708	3	$247
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	374	$119,434	11	$319
	Roomer	2	$584	0	$292
	Other	68	$23,251	2	$342
RACE	AmericanIndian	7	$2,208	0	$315
	Other	63	$22,496	2	$357
	NativeHawaiian	4	$1,750	0	$438
	Black	411	$119,933	12	$292
	White	2,851	$778,428	85	$273
	Asian	5	$1,038	0	$208
	Unknown	22	$7,965	1	$362
DISABLED	YES	933	$215,514	28	$231
	NO	2,430	$718,304	72	$296
AGE 60 & ABV	YES	1,564	$359,164	47	$230
	NO	1,799	$574,654	53	$319
AGE 5 & BLW	YES	541	$165,513	16	$306
	NO	2,822	$768,305	84	$272
PAY_TYPE	DIRECT	76	$19,513	2	$257
	PROVIDER	3,306	$917,497	98	$278
REFUNDS		118	$20,791		$176

AVERAGE HOUSEHOLD SIZE: 3.05

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	1,140	$322,549	34	$283
	FuelOil	953	$261,117	28	$274
	Coal	14	$3,789	0	$271
	NaturalGas	1,015	$279,398	30	$275
	Kerosene	7	$1,724	0	$246
	Propane	179	$48,634	5	$272
	WoodOrOther	26	$8,788	1	$338
	BlendedFuel	29	$7,819	1	$270
INCOME RANGE	0 - 999	114	$111,670	3	$980
	1000 - 1999	26	$26,000	1	$1,000
	2000 - 2999	23	$23,000	1	$1,000
	3000 - 3999	29	$26,528	1	$915
	4000 - 4999	30	$24,336	1	$811
	5000 - 5999	23	$14,822	1	$644
	6000 - 6999	37	$20,980	1	$567
	7000 - 7999	29	$14,459	1	$499
	8000 - 8999	33	$14,027	1	$425
	9000 - 9999	58	$21,880	2	$377
	10000 - 10999	62	$20,312	2	$328
	11000 - 11999	251	$70,383	7	$280
	12000 - 12999	284	$69,756	8	$246
	13000 - 13999	144	$31,200	4	$217
	14000 - 14999	165	$33,465	5	$203
	15000 - 15999	188	$37,600	6	$200
	16000 - 16999	162	$32,400	5	$200
	17000 - 17999	157	$31,400	5	$200
	18000 - 18999	176	$35,200	5	$200
	19000 - 19999	145	$29,000	4	$200
	> 19999	1,227	$245,400	36	$200
PAYMENT TYPE	Regular	3,363	$933,818		$278
	Reissue	1	$270		$270
	Secondpay	14	$2,261		$162
	Underpay	4	$661		$165
	Extraordinary	0	$0		$0
TOTAL PMT		3,382	$937,010		$277
RECOUPMENTS		3	$300		$100
NET PAID			$936,710		
PMT SUB TYPE	APD	0	$0		$0
	STD	3,382	$937,010		$277

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 42

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	572	$154,559	50	$270
	Renter	386	$117,515	34	$304
	RenterWithHeat	5	$2,003	0	$401
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	144	$46,982	13	$326
	Roomer	0	$0	0	$0
	Other	27	$8,111	2	$300
RACE	AmericanIndian	6	$2,930	1	$488
	Other	8	$3,083	1	$385
	NativeHawaiian	1	$200	0	$200
	Black	5	$2,132	0	$426
	White	1,113	$320,625	98	$288
	Asian	0	$0	0	$0
	Unknown	1	$200	0	$200
DISABLED	YES	378	$91,037	33	$241
	NO	756	$238,133	67	$315
AGE 60 & ABV	YES	522	$119,223	46	$228
	NO	612	$209,947	54	$343
AGE 5 & BLW	YES	142	$41,215	13	$290
	NO	992	$287,955	87	$290
PAY_TYPE	DIRECT	19	$7,135	2	$376
	PROVIDER	1,118	$322,618	98	$289
REFUNDS		39	$7,303		$187

AVERAGE HOUSEHOLD SIZE: 3.27

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	290	$92,301	26	$318
	FuelOil	6	$1,659	1	$276
	Coal	3	$1,240	0	$413
	NaturalGas	770	$215,614	68	$280
	Kerosene	0	$0	0	$0
	Propane	37	$9,905	3	$268
	WoodOrOther	27	$8,015	2	$297
	BlendedFuel	1	$436	0	$436
INCOME RANGE	0 - 999	49	$48,840	4	$997
	1000 - 1999	8	$8,000	1	$1,000
	2000 - 2999	8	$8,000	1	$1,000
	3000 - 3999	12	$10,948	1	$912
	4000 - 4999	9	$7,271	1	$808
	5000 - 5999	14	$9,076	1	$648
	6000 - 6999	14	$7,961	1	$569
	7000 - 7999	11	$5,447	1	$495
	8000 - 8999	11	$4,743	1	$431
	9000 - 9999	12	$4,514	1	$376
	10000 - 10999	21	$6,968	2	$332
	11000 - 11999	96	$27,540	8	$287
	12000 - 12999	108	$26,966	10	$250
	13000 - 13999	41	$8,875	4	$216
	14000 - 14999	43	$8,610	4	$200
	15000 - 15999	54	$10,811	5	$200
	16000 - 16999	49	$9,800	4	$200
	17000 - 17999	46	$9,200	4	$200
	18000 - 18999	67	$13,400	6	$200
	19000 - 19999	52	$10,400	5	$200
	> 19999	409	$81,800	36	$200
PAYMENT TYPE	Regular	1,134	$329,170		$290
	Reissue	0	$0		$0
	Secondpay	3	$583		$194
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,137	$329,753		$290
RECOUPMENTS		0	$0		$0
NET PAID			$329,753		
PMT SUB TYPE	APD	0	$0		$0
	STD	1,137	$329,753		$290

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 43

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,373	$365,799	42	$266
	Renter	1,432	$438,557	43	$306
	RenterWithHeat	28	$8,884	1	$317
	SubsidizedWithHeat	1	$263	0	$263
	SubsidizedNoHeat	405	$146,337	12	$361
	Roomer	3	$1,471	0	$490
	Other	52	$18,700	2	$360
RACE	AmericanIndian	7	$3,857	0	$551
	Other	46	$16,263	1	$354
	NativeHawaiian	0	$0	0	$0
	Black	518	$172,486	16	$333
	White	2,673	$771,214	81	$289
	Asian	11	$4,332	0	$394
	Unknown	39	$11,859	1	$304
DISABLED	YES	1,097	$245,152	33	$223
	NO	2,197	$734,859	67	$334
AGE 60 & ABV	YES	1,391	$319,795	42	$230
	NO	1,903	$660,216	58	$347
AGE 5 & BLW	YES	521	$174,933	16	$336
	NO	2,773	$805,078	84	$290
PAY_TYPE	DIRECT	56	$18,431	2	$329
	PROVIDER	3,247	$964,145	98	$297
REFUNDS		134	$32,516		$243

AVERAGE HOUSEHOLD SIZE: 3.04

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	1,108	$344,553	34	$311
	FuelOil	221	$63,398	7	$287
	Coal	2	$400	0	$200
	NaturalGas	1,791	$525,658	54	$293
	Kerosene	6	$1,507	0	$251
	Propane	124	$34,963	4	$282
	WoodOrOther	21	$4,773	1	$227
	BlendedFuel	21	$4,759	1	$227
INCOME RANGE	0 - 999	193	$192,200	6	$996
	1000 - 1999	27	$27,000	1	$1,000
	2000 - 2999	31	$31,000	1	$1,000
	3000 - 3999	30	$24,759	1	$825
	4000 - 4999	29	$21,313	1	$735
	5000 - 5999	39	$22,965	1	$589
	6000 - 6999	37	$19,158	1	$518
	7000 - 7999	44	$19,667	1	$447
	8000 - 8999	53	$20,838	2	$393
	9000 - 9999	42	$14,494	1	$345
	10000 - 10999	71	$21,174	2	$298
	11000 - 11999	273	$71,020	8	$260
	12000 - 12999	345	$78,255	10	$227
	13000 - 13999	137	$27,568	4	$201
	14000 - 14999	138	$27,600	4	$200
	15000 - 15999	142	$28,400	4	$200
	16000 - 16999	150	$30,000	5	$200
	17000 - 17999	149	$29,800	5	$200
	18000 - 18999	139	$27,800	4	$200
	19000 - 19999	138	$27,600	4	$200
	> 19999	1,087	$217,400	33	$200
PAYMENT TYPE	Regular	3,294	$980,011		$298
	Reissue	2	$300		$150
	Secondpay	7	$2,265		$324
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		3,303	$982,576		$297
RECOUPMENTS		3	$374		$125
NET PAID			$982,202		
PMT SUB TYPE	APD	0	$0		$0
	STD	3,303	$982,576		$297

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 44

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	681	$180,500	42	$265
	Renter	797	$224,303	49	$281
	RenterWithHeat	14	$3,950	1	$282
	SubsidizedWithHeat	1	$200	0	$200
	SubsidizedNoHeat	93	$27,552	6	$296
	Roomer	1	$544	0	$544
	Other	30	$10,031	2	$334
RACE	AmericanIndian	0	$0	0	$0
	Other	32	$11,027	2	$345
	NativeHawaiian	1	$200	0	$200
	Black	31	$12,000	2	$387
	White	1,543	$421,758	95	$273
	Asian	1	$200	0	$200
	Unknown	9	$1,895	1	$211
DISABLED	YES	446	$100,681	28	$226
	NO	1,171	$346,399	72	$296
AGE 60 & ABV	YES	816	$184,568	50	$226
	NO	801	$262,512	50	$328
AGE 5 & BLW	YES	225	$64,055	14	$285
	NO	1,392	$383,025	86	$275
PAY_TYPE	DIRECT	19	$7,821	1	$412
	PROVIDER	1,619	$444,058	99	$274
REFUNDS		67	$15,821		$236

AVERAGE HOUSEHOLD SIZE: 3.1

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	525	$143,437	32	$273
	FuelOil	759	$214,058	47	$282
	Coal	5	$1,008	0	$202
	NaturalGas	192	$52,892	12	$275
	Kerosene	5	$1,128	0	$226
	Propane	87	$22,509	5	$259
	WoodOrOther	41	$11,152	3	$272
	BlendedFuel	3	$896	0	$299
INCOME RANGE	0 - 999	66	$65,200	4	$988
	1000 - 1999	8	$8,000	0	$1,000
	2000 - 2999	9	$8,929	1	$992
	3000 - 3999	9	$8,362	1	$929
	4000 - 4999	16	$12,575	1	$786
	5000 - 5999	11	$7,092	1	$645
	6000 - 6999	12	$6,760	1	$563
	7000 - 7999	20	$9,713	1	$486
	8000 - 8999	21	$8,709	1	$415
	9000 - 9999	25	$9,282	2	$371
	10000 - 10999	30	$9,728	2	$324
	11000 - 11999	117	$32,393	7	$277
	12000 - 12999	119	$28,366	7	$238
	13000 - 13999	53	$11,383	3	$215
	14000 - 14999	72	$14,748	4	$205
	15000 - 15999	78	$15,640	5	$201
	16000 - 16999	75	$15,000	5	$200
	17000 - 17999	69	$13,800	4	$200
	18000 - 18999	87	$17,400	5	$200
	19000 - 19999	100	$20,000	6	$200
	> 19999	620	$124,000	38	$200
PAYMENT TYPE	Regular	1,617	$447,080		$276
	Reissue	2	$200		$100
	Secondpay	18	$4,499		$250
	Underpay	0	$0		$0
	Extraordinary	1	$100		$100
TOTAL PMT		1,638	$451,879		$276
RECOUPMENTS		1	$200		$200
NET PAID			$451,679		
PMT SUB TYPE	APD	0	$0		$0
	STD	1,638	$451,879		$276

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 45

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,466	$401,680	48	$274
	Renter	1,293	$377,679	42	$292
	RenterWithHeat	22	$5,357	1	$244
	SubsidizedWithHeat	1	$200	0	$200
	SubsidizedNoHeat	264	$80,858	9	$306
	Roomer	8	$4,839	0	$605
	Other	32	$11,345	1	$355
RACE	AmericanIndian	15	$5,260	0	$351
	Other	474	$143,638	15	$303
	NativeHawaiian	17	$4,595	1	$270
	Black	481	$145,421	16	$302
	White	1,954	$544,257	63	$279
	Asian	33	$7,155	1	$217
	Unknown	112	$31,632	4	$282
DISABLED	YES	705	$160,446	23	$228
	NO	2,381	$721,512	77	$303
AGE 60 & ABV	YES	1,465	$347,936	47	$237
	NO	1,621	$534,022	53	$329
AGE 5 & BLW	YES	490	$136,858	16	$279
	NO	2,596	$745,100	84	$287
PAY_TYPE	DIRECT	48	$16,346	2	$341
	PROVIDER	3,055	$868,827	98	$284
REFUNDS		62	$11,823		$191

AVERAGE HOUSEHOLD SIZE: 3.06

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	1,902	$547,275	62	$288
	FuelOil	570	$161,363	18	$283
	Coal	9	$3,257	0	$362
	NaturalGas	127	$34,944	4	$275
	Kerosene	79	$21,334	3	$270
	Propane	381	$108,822	12	$286
	WoodOrOther	12	$3,471	0	$289
	BlendedFuel	6	$1,492	0	$249
INCOME RANGE	0 - 999	150	$150,000	5	$1,000
	1000 - 1999	21	$21,000	1	$1,000
	2000 - 2999	22	$22,000	1	$1,000
	3000 - 3999	21	$18,642	1	$888
	4000 - 4999	25	$19,612	1	$784
	5000 - 5999	25	$16,228	1	$649
	6000 - 6999	24	$13,162	1	$548
	7000 - 7999	34	$16,239	1	$478
	8000 - 8999	48	$20,409	2	$425
	9000 - 9999	47	$17,232	2	$367
	10000 - 10999	55	$17,578	2	$320
	11000 - 11999	196	$55,372	6	$283
	12000 - 12999	188	$46,149	6	$245
	13000 - 13999	122	$26,479	4	$217
	14000 - 14999	123	$24,738	4	$201
	15000 - 15999	146	$29,318	5	$201
	16000 - 16999	130	$26,000	4	$200
	17000 - 17999	121	$24,200	4	$200
	18000 - 18999	145	$29,000	5	$200
	19000 - 19999	146	$29,200	5	$200
	> 19999	1,297	$259,400	42	$200
PAYMENT TYPE	Regular	3,086	$881,958		$286
	Reissue	1	$236		$236
	Secondpay	16	$2,979		$186
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		3,103	$885,173		$285
RECOUPMENTS		4	$1,400		$350
NET PAID			$883,773		
PMT SUB TYPE	APD	0	$0		$0
	STD	3,103	$885,173		$285

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 46

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,747	$500,920	30	$287
	Renter	2,877	$795,982	50	$277
	RenterWithHeat	85	$25,222	1	$297
	SubsidizedWithHeat	2	$400	0	$200
	SubsidizedNoHeat	1,031	$307,073	18	$298
	Roomer	5	$1,801	0	$360
	Other	41	$15,035	1	$367
RACE	AmericanIndian	27	$10,225	0	$379
	Other	518	$138,417	9	$267
	NativeHawaiian	10	$2,106	0	$211
	Black	1,804	$555,021	31	$308
	White	2,903	$796,235	50	$274
	Asian	348	$91,243	6	$262
	Unknown	178	$53,186	3	$299
DISABLED	YES	1,372	$301,705	24	$220
	NO	4,416	$1,344,728	76	$305
AGE 60 & ABV	YES	2,584	$604,853	45	$234
	NO	3,204	$1,041,580	55	$325
AGE 5 & BLW	YES	964	$293,704	17	$305
	NO	4,824	$1,352,729	83	$280
PAY_TYPE	DIRECT	149	$47,305	3	$317
	PROVIDER	5,683	$1,611,542	97	$284
REFUNDS		162	$41,354		$255

AVERAGE HOUSEHOLD SIZE: 2.82

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	2,948	$829,790	51	$281
	FuelOil	789	$231,576	14	$294
	Coal	0	$0	0	$0
	NaturalGas	1,961	$561,401	34	$286
	Kerosene	1	$200	0	$200
	Propane	88	$23,209	2	$264
	WoodOrOther	1	$257	0	$257
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	321	$320,200	6	$998
	1000 - 1999	48	$47,875	1	$997
	2000 - 2999	42	$39,474	1	$940
	3000 - 3999	50	$38,200	1	$764
	4000 - 4999	47	$31,582	1	$672
	5000 - 5999	51	$27,979	1	$549
	6000 - 6999	66	$31,726	1	$481
	7000 - 7999	90	$37,583	2	$418
	8000 - 8999	97	$35,575	2	$367
	9000 - 9999	93	$29,001	2	$312
	10000 - 10999	139	$38,770	2	$279
	11000 - 11999	411	$97,861	7	$238
	12000 - 12999	473	$97,826	8	$207
	13000 - 13999	218	$44,380	4	$204
	14000 - 14999	253	$50,601	4	$200
	15000 - 15999	241	$48,200	4	$200
	16000 - 16999	253	$50,600	4	$200
	17000 - 17999	265	$53,000	5	$200
	18000 - 18999	298	$59,600	5	$200
	19000 - 19999	266	$53,200	5	$200
	> 19999	2,066	$413,200	36	$200
PAYMENT TYPE	Regular	5,788	$1,646,433		$284
	Reissue	5	$1,649		$330
	Secondpay	36	$10,079		$280
	Underpay	2	$577		$288
	Extraordinary	1	$109		$109
TOTAL PMT		5,832	$1,658,847		$284
RECOUPMENTS		7	$2,778		$397
NET PAID			$1,656,069		
PMT SUB TYPE	APD	0	$0		$0
	STD	5,832	$1,658,847		$284

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 47

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	138	$35,423	39	$257
	Renter	139	$39,385	39	$283
	RenterWithHeat	1	$200	0	$200
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	69	$19,588	20	$284
	Roomer	0	$0	0	$0
	Other	5	$1,000	1	$200
RACE	AmericanIndian	0	$0	0	$0
	Other	10	$4,207	3	$421
	NativeHawaiian	0	$0	0	$0
	Black	9	$3,109	3	$345
	White	327	$86,108	93	$263
	Asian	1	$1,000	0	$1,000
	Unknown	5	$1,172	1	$234
DISABLED	YES	92	$21,621	26	$235
	NO	260	$73,975	74	$285
AGE 60 & ABV	YES	179	$40,606	51	$227
	NO	173	$54,990	49	$318
AGE 5 & BLW	YES	58	$13,798	16	$238
	NO	294	$81,798	84	$278
PAY_TYPE	DIRECT	2	$1,257	1	$628
	PROVIDER	352	$94,895	99	$270
REFUNDS		12	$1,947		$162

AVERAGE HOUSEHOLD SIZE: 2.52

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	164	$46,931	47	$286
	FuelOil	88	$22,297	25	$253
	Coal	0	$0	0	$0
	NaturalGas	50	$12,843	14	$257
	Kerosene	3	$1,696	1	$565
	Propane	46	$10,829	13	$235
	WoodOrOther	1	$1,000	0	$1,000
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	10	$10,000	3	$1,000
	1000 - 1999	4	$4,000	1	$1,000
	2000 - 2999	3	$3,000	1	$1,000
	3000 - 3999	3	$2,443	1	$814
	4000 - 4999	2	$1,481	1	$740
	5000 - 5999	3	$1,760	1	$587
	6000 - 6999	2	$1,120	1	$560
	7000 - 7999	3	$1,424	1	$475
	8000 - 8999	7	$2,925	2	$418
	9000 - 9999	3	$1,015	1	$338
	10000 - 10999	6	$1,881	2	$314
	11000 - 11999	25	$6,899	7	$276
	12000 - 12999	37	$8,644	11	$234
	13000 - 13999	17	$3,596	5	$212
	14000 - 14999	16	$3,208	5	$200
	15000 - 15999	15	$3,000	4	$200
	16000 - 16999	15	$3,000	4	$200
	17000 - 17999	15	$3,000	4	$200
	18000 - 18999	28	$5,600	8	$200
	19000 - 19999	24	$4,800	7	$200
	> 19999	114	$22,800	32	$200
PAYMENT TYPE	Regular	352	$95,596		$272
	Reissue	0	$0		$0
	Secondpay	2	$556		$278
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		354	$96,152		$272
RECOUPMENTS		1	$390		$390
NET PAID			$95,762		
PMT SUB TYPE	APD	0	$0		$0
	STD	354	$96,152		$272

Energy Assistance Summary (EASUM)

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County 48

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,162	$306,702	32	$264
	Renter	1,757	$468,247	49	$267
	RenterWithHeat	30	$8,725	1	$291
	SubsidizedWithHeat	1	$200	0	$200
	SubsidizedNoHeat	615	$173,844	17	$283
	Roomer	5	$1,330	0	$266
	Other	31	$8,147	1	$263
RACE	AmericanIndian	9	$1,800	0	$200
	Other	621	$165,913	17	$267
	NativeHawaiian	16	$4,282	0	$268
	Black	416	$115,766	12	$278
	White	2,413	$642,110	67	$266
	Asian	31	$8,953	1	$289
	Unknown	95	$28,371	3	$299
DISABLED	YES	992	$218,029	28	$220
	NO	2,609	$749,166	72	$287
AGE 60 & ABV	YES	1,541	$352,197	43	$229
	NO	2,060	$614,998	57	$299
AGE 5 & BLW	YES	628	$177,550	17	$283
	NO	2,973	$789,645	83	$266
PAY_TYPE	DIRECT	34	$8,746	1	$257
	PROVIDER	3,592	$963,911	99	$268
REFUNDS		108	$17,938		$166

AVERAGE HOUSEHOLD SIZE: 2.97

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	1,701	$471,080	47	$277
	FuelOil	717	$178,780	20	$249
	Coal	3	$600	0	$200
	NaturalGas	984	$262,524	27	$267
	Kerosene	51	$13,987	1	$274
	Propane	139	$37,929	4	$273
	WoodOrOther	5	$1,370	0	$274
	BlendedFuel	1	$925	0	$925
INCOME RANGE	0 - 999	137	$136,780	4	$998
	1000 - 1999	30	$30,000	1	$1,000
	2000 - 2999	21	$20,648	1	$983
	3000 - 3999	27	$21,356	1	$791
	4000 - 4999	36	$25,252	1	$701
	5000 - 5999	24	$13,471	1	$561
	6000 - 6999	34	$16,730	1	$492
	7000 - 7999	32	$13,860	1	$433
	8000 - 8999	40	$15,212	1	$380
	9000 - 9999	62	$20,301	2	$327
	10000 - 10999	76	$21,786	2	$287
	11000 - 11999	229	$56,781	6	$248
	12000 - 12999	276	$59,382	8	$215
	13000 - 13999	144	$28,967	4	$201
	14000 - 14999	158	$31,669	4	$200
	15000 - 15999	154	$30,800	4	$200
	16000 - 16999	151	$30,200	4	$200
	17000 - 17999	186	$37,200	5	$200
	18000 - 18999	165	$33,000	5	$200
	19000 - 19999	164	$32,800	5	$200
	> 19999	1,455	$291,000	40	$200
PAYMENT TYPE	Regular	3,601	$967,195		$269
	Reissue	11	$1,100		$100
	Secondpay	13	$4,262		$328
	Underpay	0	$0		$0
	Extraordinary	1	$100		$100
TOTAL PMT		3,626	$972,657		$268
RECOUPMENTS		3	$1,082		$361
NET PAID			$971,575		
PMT SUB TYPE	APD	0	$0		$0
	STD	3,626	$972,657		$268

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,554	$437,468	46	$282
	Renter	1,409	$423,795	42	$301
	RenterWithHeat	20	$4,707	1	$235
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	308	$94,326	9	$306
	Roomer	0	$0	0	$0
	Other	87	$28,379	3	$326
RACE	AmericanIndian	7	$1,591	0	$227
	Other	156	$47,384	5	$304
	NativeHawaiian	2	$1,200	0	$600
	Black	136	$49,040	4	$361
	White	3,012	$867,980	89	$288
	Asian	11	$3,286	0	$299
	Unknown	54	$18,194	2	$337
DISABLED	YES	920	$206,610	27	$225
	NO	2,458	$782,065	73	$318
AGE 60 & ABV	YES	1,506	$342,221	45	$227
	NO	1,872	$646,454	55	$345
AGE 5 & BLW	YES	560	$186,441	17	$333
	NO	2,818	$802,234	83	$285
PAY_TYPE	DIRECT	42	$14,924	1	$355
	PROVIDER	3,356	$977,570	99	$291
REFUNDS		92	$16,490		$179

AVERAGE HOUSEHOLD SIZE: 3.13

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	1,148	$347,359	34	$303
	FuelOil	1,423	$426,652	42	$300
	Coal	49	$13,975	1	$285
	NaturalGas	610	$160,375	18	$263
	Kerosene	1	$233	0	$233
	Propane	131	$35,737	4	$273
	WoodOrOther	15	$4,144	0	$276
	BlendedFuel	1	$200	0	$200
INCOME RANGE	0 - 999	197	$196,200	6	$996
	1000 - 1999	34	$34,000	1	$1,000
	2000 - 2999	23	$22,904	1	$996
	3000 - 3999	26	$22,142	1	$852
	4000 - 4999	23	$17,679	1	$769
	5000 - 5999	28	$17,210	1	$615
	6000 - 6999	21	$11,196	1	$533
	7000 - 7999	29	$13,357	1	$461
	8000 - 8999	49	$19,800	1	$404
	9000 - 9999	62	$21,702	2	$350
	10000 - 10999	82	$25,199	2	$307
	11000 - 11999	256	$68,487	8	$268
	12000 - 12999	259	$60,209	8	$232
	13000 - 13999	138	$28,357	4	$205
	14000 - 14999	144	$28,833	4	$200
	15000 - 15999	135	$27,000	4	$200
	16000 - 16999	171	$34,200	5	$200
	17000 - 17999	156	$31,200	5	$200
	18000 - 18999	175	$35,000	5	$200
	19000 - 19999	151	$30,200	4	$200
	> 19999	1,219	$243,800	36	$200
PAYMENT TYPE	Regular	3,378	$988,675		$293
	Reissue	3	$446		$149
	Secondpay	16	$2,991		$187
	Underpay	1	$382		$382
	Extraordinary	0	$0		$0
TOTAL PMT		3,398	$992,494		$292
RECOUPMENTS		16	$2,263		$141
NET PAID			$990,231		
PMT SUB TYPE	APD	0	$0		$0
	STD	3,398	$992,494		$292

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	347	$77,412	40	$223
	Renter	410	$112,768	47	$275
	RenterWithHeat	4	$813	0	$203
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	87	$21,815	10	$251
	Roomer	0	$0	0	$0
	Other	23	$5,266	3	$229
RACE	AmericanIndian	4	$800	0	$200
	Other	16	$4,826	2	$302
	NativeHawaiian	1	$367	0	$367
	Black	15	$5,000	2	$333
	White	825	$204,838	95	$248
	Asian	3	$613	0	$204
	Unknown	7	$1,630	1	$233
DISABLED	YES	253	$54,115	29	$214
	NO	618	$163,959	71	$265
AGE 60 & ABV	YES	441	$95,418	51	$216
	NO	430	$122,656	49	$285
AGE 5 & BLW	YES	148	$40,318	17	$272
	NO	723	$177,756	83	$246
PAY_TYPE	DIRECT	27	$5,950	3	$220
	PROVIDER	850	$212,950	97	$251
REFUNDS		20	$2,790		$140

AVERAGE HOUSEHOLD SIZE: 3.2

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	372	$90,824	43	$244
	FuelOil	354	$92,005	41	$260
	Coal	6	$1,926	1	$321
	NaturalGas	0	$0	0	$0
	Kerosene	4	$892	0	$223
	Propane	128	$30,248	15	$236
	WoodOrOther	7	$2,179	1	$311
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	26	$26,000	3	$1,000
	1000 - 1999	4	$3,926	0	$982
	2000 - 2999	3	$2,941	0	$980
	3000 - 3999	2	$1,567	0	$784
	4000 - 4999	4	$2,936	0	$734
	5000 - 5999	3	$1,772	0	$591
	6000 - 6999	3	$1,549	0	$516
	7000 - 7999	9	$4,258	1	$473
	8000 - 8999	8	$3,028	1	$378
	9000 - 9999	7	$2,398	1	$343
	10000 - 10999	15	$4,571	2	$305
	11000 - 11999	50	$13,072	6	$261
	12000 - 12999	81	$18,558	9	$229
	13000 - 13999	39	$8,098	4	$208
	14000 - 14999	43	$8,600	5	$200
	15000 - 15999	33	$6,600	4	$200
	16000 - 16999	37	$7,400	4	$200
	17000 - 17999	40	$8,000	5	$200
	18000 - 18999	47	$9,400	5	$200
	19000 - 19999	38	$7,600	4	$200
	> 19999	379	$75,800	44	$200
PAYMENT TYPE	Regular	871	$218,074		$250
	Reissue	2	$200		$100
	Secondpay	3	$526		$175
	Underpay	0	$0		$0
	Extraordinary	1	$100		$100
TOTAL PMT		877	$218,900		$250
RECOUPMENTS		1	$200		$200
NET PAID			$218,700		
PMT SUB TYPE	APD	0	$0		$0
	STD	877	$218,900		$250

Energy Assistance Summary (EASUM)

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County 51

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	17,964	$4,595,496	38	$256
	Renter	23,076	$6,613,397	48	$287
	RenterWithHeat	352	$102,312	1	$291
	SubsidizedWithHeat	13	$4,295	0	$330
	SubsidizedNoHeat	5,962	$1,803,637	12	$303
	Roomer	29	$10,936	0	$377
	Other	450	$152,364	1	$339
RACE	AmericanIndian	122	$44,299	0	$363
	Other	8,576	$2,295,940	18	$268
	NativeHawaiian	122	$37,783	0	$310
	Black	26,594	$7,563,857	56	$284
	White	8,635	$2,372,699	18	$275
	Asian	3,063	$761,283	6	$249
	Unknown	734	$206,576	2	$281
DISABLED	YES	13,867	$3,038,812	29	$219
	NO	33,979	$10,243,625	71	$301
AGE 60 & ABV	YES	23,793	$5,434,882	50	$228
	NO	24,053	$7,847,555	50	$326
AGE 5 & BLW	YES	6,883	$2,114,593	14	$307
	NO	40,963	$11,167,844	86	$273
PAY_TYPE	DIRECT	425	$132,438	1	$312
	PROVIDER	47,523	$13,183,576	99	$277
REFUNDS		479	$146,080		$305

AVERAGE HOUSEHOLD SIZE: 3.06

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	15,533	$4,676,632	32	$301
	FuelOil	1,448	$459,892	3	$318
	Coal	0	$0	0	$0
	NaturalGas	30,864	$8,144,913	65	$264
	Kerosene	1	$1,000	0	$1,000
	Propane	0	$0	0	$0
	WoodOrOther	0	$0	0	$0
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	2,178	$2,176,842	5	$999
	1000 - 1999	329	$327,606	1	$996
	2000 - 2999	332	$307,764	1	$927
	3000 - 3999	456	$340,434	1	$747
	4000 - 4999	526	$352,346	1	$670
	5000 - 5999	457	$243,840	1	$534
	6000 - 6999	490	$228,086	1	$465
	7000 - 7999	648	$263,530	1	$407
	8000 - 8999	692	$245,446	1	$355
	9000 - 9999	878	$272,744	2	$311
	10000 - 10999	1,193	$321,414	2	$269
	11000 - 11999	6,649	$1,560,077	14	$235
	12000 - 12999	6,000	$1,230,328	13	$205
	13000 - 13999	1,972	$399,145	4	$202
	14000 - 14999	2,118	$426,771	4	$201
	15000 - 15999	1,947	$389,864	4	$200
	16000 - 16999	1,864	$372,800	4	$200
	17000 - 17999	2,215	$443,000	5	$200
	18000 - 18999	1,996	$399,200	4	$200
	19000 - 19999	1,774	$354,800	4	$200
	> 19999	13,132	$2,626,400	27	$200
PAYMENT TYPE	Regular	47,846	$13,282,437		$278
	Reissue	12	$4,280		$357
	Secondpay	84	$27,514		$328
	Underpay	2	$791		$396
	Extraordinary	4	$992		$248
TOTAL PMT		47,948	$13,316,014		$278
RECOUPMENTS		40	$11,888		$297
NET PAID			$13,304,126		
PMT SUB TYPE	APD	0	$0		$0
	STD	47,948	$13,316,013		$278

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	515	$146,907	52	$285
	Renter	328	$95,538	33	$291
	RenterWithHeat	2	$422	0	$211
	SubsidizedWithHeat	1	$200	0	$200
	SubsidizedNoHeat	123	$39,534	12	$321
	Roomer	0	$0	0	$0
	Other	23	$10,446	2	$454
RACE	AmericanIndian	9	$2,681	1	$298
	Other	100	$32,315	10	$323
	NativeHawaiian	4	$800	0	$200
	Black	84	$26,251	8	$313
	White	755	$216,874	76	$287
	Asian	8	$2,881	1	$360
	Unknown	32	$11,245	3	$351
DISABLED	YES	224	$49,163	23	$219
	NO	768	$243,884	77	$318
AGE 60 & ABV	YES	427	$102,664	43	$240
	NO	565	$190,383	57	$337
AGE 5 & BLW	YES	161	$48,865	16	$304
	NO	831	$244,182	84	$294
PAY_TYPE	DIRECT	8	$3,057	1	$382
	PROVIDER	993	$291,996	99	$294
REFUNDS		28	$5,516		$197

AVERAGE HOUSEHOLD SIZE: 3.02

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	558	$174,139	56	$312
	FuelOil	181	$46,351	18	$256
	Coal	1	$200	0	$200
	NaturalGas	54	$12,232	5	$227
	Kerosene	18	$6,908	2	$384
	Propane	176	$52,261	18	$297
	WoodOrOther	2	$400	0	$200
	BlendedFuel	2	$556	0	$278
INCOME RANGE	0 - 999	53	$53,000	5	$1,000
	1000 - 1999	10	$10,000	1	$1,000
	2000 - 2999	10	$10,000	1	$1,000
	3000 - 3999	14	$12,154	1	$868
	4000 - 4999	5	$3,882	1	$776
	5000 - 5999	6	$3,875	1	$646
	6000 - 6999	12	$6,598	1	$550
	7000 - 7999	11	$5,334	1	$485
	8000 - 8999	17	$7,244	2	$426
	9000 - 9999	13	$4,675	1	$360
	10000 - 10999	14	$4,449	1	$318
	11000 - 11999	40	$11,159	4	$279
	12000 - 12999	63	$15,247	6	$242
	13000 - 13999	42	$8,989	4	$214
	14000 - 14999	40	$8,022	4	$201
	15000 - 15999	28	$5,619	3	$201
	16000 - 16999	44	$8,800	4	$200
	17000 - 17999	55	$11,000	6	$200
	18000 - 18999	37	$7,400	4	$200
	19000 - 19999	49	$9,800	5	$200
	> 19999	429	$85,800	43	$200
PAYMENT TYPE	Regular	992	$293,047		$295
	Reissue	1	$200		$200
	Secondpay	7	$1,706		$244
	Underpay	0	$0		$0
	Extraordinary	1	$100		$100
TOTAL PMT		1,001	$295,053		$295
RECOUPMENTS		2	$336		$168
NET PAID			$294,717		
PMT SUB TYPE	APD	0	$0		$0
	STD	1,001	$295,053		$295

Energy Assistance Summary (EASUM)

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County 53

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	208	$53,372	48	$257
	Renter	163	$45,253	38	$278
	RenterWithHeat	1	$200	0	$200
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	42	$13,282	10	$316
	Roomer	0	$0	0	$0
	Other	18	$5,497	4	$305
RACE	AmericanIndian	2	$579	0	$290
	Other	1	$200	0	$200
	NativeHawaiian	0	$0	0	$0
	Black	5	$1,084	1	$217
	White	421	$115,141	97	$273
	Asian	0	$0	0	$0
	Unknown	3	$600	1	$200
DISABLED	YES	125	$29,747	29	$238
	NO	307	$87,857	71	$286
AGE 60 & ABV	YES	228	$51,726	53	$227
	NO	204	$65,878	47	$323
AGE 5 & BLW	YES	46	$16,023	11	$348
	NO	386	$101,581	89	$263
PAY_TYPE	DIRECT	10	$3,395	2	$340
	PROVIDER	423	$114,309	98	$270
REFUNDS		4	$366		$92

AVERAGE HOUSEHOLD SIZE: 3.22

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	103	$32,431	24	$315
	FuelOil	10	$2,478	2	$248
	Coal	7	$1,587	2	$227
	NaturalGas	259	$67,654	60	$261
	Kerosene	1	$200	0	$200
	Propane	38	$9,532	9	$251
	WoodOrOther	14	$3,722	3	$266
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	14	$14,000	3	$1,000
	1000 - 1999	2	$2,000	0	$1,000
	2000 - 2999	3	$3,000	1	$1,000
	3000 - 3999	1	$975	0	$975
	4000 - 4999	1	$801	0	$801
	5000 - 5999	3	$1,954	1	$651
	6000 - 6999	4	$2,269	1	$567
	7000 - 7999	4	$1,984	1	$496
	8000 - 8999	7	$3,035	2	$434
	9000 - 9999	7	$2,652	2	$379
	10000 - 10999	12	$3,950	3	$329
	11000 - 11999	43	$12,173	10	$283
	12000 - 12999	47	$11,679	11	$248
	13000 - 13999	17	$3,707	4	$218
	14000 - 14999	16	$3,210	4	$201
	15000 - 15999	15	$3,015	3	$201
	16000 - 16999	24	$4,800	6	$200
	17000 - 17999	20	$4,000	5	$200
	18000 - 18999	19	$3,800	4	$200
	19000 - 19999	16	$3,200	4	$200
	> 19999	157	$31,400	36	$200
PAYMENT TYPE	Regular	432	$117,604		$272
	Reissue	0	$0		$0
	Secondpay	1	$100		$100
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		433	$117,704		$272
RECOUPMENTS		0	$0		$0
NET PAID			$117,704		
PMT SUB TYPE	APD	0	$0		$0
	STD	433	$117,704		$272

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	2,502	$685,990	51	$274
	Renter	1,898	$550,414	39	$290
	RenterWithHeat	29	$6,978	1	$241
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	340	$93,890	7	$276
	Roomer	4	$1,693	0	$423
	Other	95	$34,520	2	$363
RACE	AmericanIndian	12	$4,784	0	$399
	Other	422	$131,419	9	$311
	NativeHawaiian	7	$3,000	0	$429
	Black	173	$57,837	4	$334
	White	4,162	$1,148,556	85	$276
	Asian	8	$1,953	0	$244
	Unknown	84	$25,936	2	$309
DISABLED	YES	1,225	$275,218	25	$225
	NO	3,643	$1,098,267	75	$301
AGE 60 & ABV	YES	2,451	$565,584	50	$231
	NO	2,417	$807,901	50	$334
AGE 5 & BLW	YES	748	$227,867	15	$305
	NO	4,120	$1,145,618	85	$278
PAY_TYPE	DIRECT	56	$16,508	1	$295
	PROVIDER	4,887	$1,373,834	99	$281
REFUNDS		174	$31,860		$183

AVERAGE HOUSEHOLD SIZE: 2.97

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	1,623	$476,237	33	$293
	FuelOil	2,551	$707,954	52	$278
	Coal	323	$84,783	7	$262
	NaturalGas	156	$42,891	3	$275
	Kerosene	14	$3,788	0	$271
	Propane	191	$54,784	4	$287
	WoodOrOther	10	$3,048	0	$305
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	214	$213,908	4	$1,000
	1000 - 1999	34	$34,000	1	$1,000
	2000 - 2999	32	$32,000	1	$1,000
	3000 - 3999	41	$36,164	1	$882
	4000 - 4999	34	$26,752	1	$787
	5000 - 5999	35	$22,279	1	$637
	6000 - 6999	51	$28,458	1	$558
	7000 - 7999	47	$22,688	1	$483
	8000 - 8999	73	$30,622	1	$419
	9000 - 9999	67	$24,528	1	$366
	10000 - 10999	77	$24,509	2	$318
	11000 - 11999	339	$94,141	7	$278
	12000 - 12999	366	$88,948	8	$243
	13000 - 13999	209	$44,577	4	$213
	14000 - 14999	218	$43,711	4	$201
	15000 - 15999	221	$44,200	5	$200
	16000 - 16999	224	$44,800	5	$200
	17000 - 17999	259	$51,800	5	$200
	18000 - 18999	238	$47,600	5	$200
	19000 - 19999	242	$48,400	5	$200
	> 19999	1,846	$369,200	38	$200
PAYMENT TYPE	Regular	4,868	$1,373,485		$282
	Reissue	3	$400		$133
	Secondpay	70	$15,995		$228
	Underpay	0	$0		$0
	Extraordinary	2	$462		$231
TOTAL PMT		4,943	$1,390,342		$281
RECOUPMENTS		6	$752		$125
NET PAID			$1,389,590		
PMT SUB TYPE	APD	0	$0		$0
	STD	4,943	$1,390,342		$281

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	340	$83,591	42	$246
	Renter	409	$118,794	50	$290
	RenterWithHeat	1	$246	0	$246
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	42	$12,404	5	$295
	Roomer	0	$0	0	$0
	Other	21	$6,815	3	$325
RACE	AmericanIndian	1	$200	0	$200
	Other	22	$7,293	3	$332
	NativeHawaiian	1	$200	0	$200
	Black	12	$4,013	1	$334
	White	765	$206,936	94	$271
	Asian	2	$400	0	$200
	Unknown	10	$2,808	1	$281
DISABLED	YES	160	$35,864	20	$224
	NO	653	$185,986	80	$285
AGE 60 & ABV	YES	396	$90,007	49	$227
	NO	417	$131,843	51	$316
AGE 5 & BLW	YES	158	$44,236	19	$280
	NO	655	$177,614	81	$271
PAY_TYPE	DIRECT	20	$5,435	2	$272
	PROVIDER	808	$218,619	98	$271
REFUNDS		16	$3,926		$245

AVERAGE HOUSEHOLD SIZE: 3.08

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	282	$84,316	35	$299
	FuelOil	351	$90,611	43	$258
	Coal	0	$0	0	$0
	NaturalGas	69	$17,718	8	$257
	Kerosene	4	$986	0	$246
	Propane	103	$27,312	13	$265
	WoodOrOther	4	$907	0	$227
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	31	$31,000	4	$1,000
	1000 - 1999	3	$3,000	0	$1,000
	2000 - 2999	7	$6,872	1	$982
	3000 - 3999	8	$6,633	1	$829
	4000 - 4999	6	$4,322	1	$720
	5000 - 5999	8	$4,671	1	$584
	6000 - 6999	8	$4,147	1	$518
	7000 - 7999	9	$4,053	1	$450
	8000 - 8999	14	$5,341	2	$382
	9000 - 9999	18	$5,984	2	$332
	10000 - 10999	12	$3,562	1	$297
	11000 - 11999	50	$12,821	6	$256
	12000 - 12999	62	$13,957	8	$225
	13000 - 13999	29	$5,887	4	$203
	14000 - 14999	24	$4,800	3	$200
	15000 - 15999	41	$8,200	5	$200
	16000 - 16999	29	$5,800	4	$200
	17000 - 17999	40	$8,000	5	$200
	18000 - 18999	49	$9,800	6	$200
	19000 - 19999	43	$8,600	5	$200
	> 19999	322	$64,400	40	$200
PAYMENT TYPE	Regular	813	$221,850		$273
	Reissue	0	$0		$0
	Secondpay	12	$1,877		$156
	Underpay	2	$227		$114
	Extraordinary	1	$100		$100
TOTAL PMT		828	$224,054		$271
RECOUPMENTS		6	$700		$117
NET PAID			$223,354		
PMT SUB TYPE	APD	0	$0		$0
	STD	828	$224,054		$271

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,561	$428,129	51	$274
	Renter	1,136	$335,944	37	$296
	RenterWithHeat	42	$11,047	1	$263
	SubsidizedWithHeat	2	$679	0	$340
	SubsidizedNoHeat	233	$82,831	8	$355
	Roomer	0	$0	0	$0
	Other	73	$25,366	2	$347
RACE	AmericanIndian	6	$2,405	0	$401
	Other	26	$8,495	1	$327
	NativeHawaiian	4	$1,376	0	$344
	Black	21	$6,993	1	$333
	White	2,973	$860,399	98	$289
	Asian	2	$506	0	$253
	Unknown	15	$3,822	0	$255
DISABLED	YES	745	$169,700	24	$228
	NO	2,302	$714,296	76	$310
AGE 60 & ABV	YES	1,649	$388,694	54	$236
	NO	1,398	$495,302	46	$354
AGE 5 & BLW	YES	391	$132,587	13	$339
	NO	2,656	$751,409	87	$283
PAY_TYPE	DIRECT	53	$16,058	2	$303
	PROVIDER	3,076	$882,059	98	$287
REFUNDS		171	$34,194		$200

AVERAGE HOUSEHOLD SIZE: 2.95

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	745	$232,752	24	$312
	FuelOil	1,400	$385,923	46	$276
	Coal	94	$25,501	3	$271
	NaturalGas	424	$121,745	14	$287
	Kerosene	104	$31,475	3	$303
	Propane	221	$66,939	7	$303
	WoodOrOther	38	$15,256	1	$401
	BlendedFuel	21	$4,405	1	$210
INCOME RANGE	0 - 999	140	$138,627	5	$990
	1000 - 1999	37	$36,460	1	$985
	2000 - 2999	20	$20,000	1	$1,000
	3000 - 3999	24	$20,696	1	$862
	4000 - 4999	30	$22,650	1	$755
	5000 - 5999	28	$17,163	1	$613
	6000 - 6999	40	$21,431	1	$536
	7000 - 7999	34	$15,883	1	$467
	8000 - 8999	33	$13,455	1	$408
	9000 - 9999	52	$18,226	2	$350
	10000 - 10999	69	$21,201	2	$307
	11000 - 11999	250	$67,450	8	$270
	12000 - 12999	300	$71,307	10	$238
	13000 - 13999	140	$29,241	5	$209
	14000 - 14999	126	$25,406	4	$202
	15000 - 15999	148	$29,600	5	$200
	16000 - 16999	122	$24,400	4	$200
	17000 - 17999	152	$30,400	5	$200
	18000 - 18999	130	$26,000	4	$200
	19000 - 19999	129	$25,800	4	$200
	> 19999	1,043	$208,600	34	$200
PAYMENT TYPE	Regular	3,047	$883,996		$290
	Reissue	0	$0		$0
	Secondpay	77	$13,807		$179
	Underpay	2	$14		$7
	Extraordinary	3	$300		$100
TOTAL PMT		3,129	$898,117		$287
RECOUPMENTS		17	$3,441		$202
NET PAID			$894,676		
PMT SUB TYPE	APD	0	$0		$0
	STD	3,129	$898,117		$287

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	72	$19,347	34	$269
	Renter	72	$19,096	34	$265
	RenterWithHeat	1	$200	0	$200
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	58	$18,706	28	$323
	Roomer	0	$0	0	$0
	Other	6	$3,145	3	$524
RACE	AmericanIndian	0	$0	0	$0
	Other	4	$1,684	2	$421
	NativeHawaiian	0	$0	0	$0
	Black	0	$0	0	$0
	White	205	$58,810	98	$287
	Asian	0	$0	0	$0
	Unknown	0	$0	0	$0
DISABLED	YES	66	$16,172	32	$245
	NO	143	$44,322	68	$310
AGE 60 & ABV	YES	128	$30,512	61	$238
	NO	81	$29,982	39	$370
AGE 5 & BLW	YES	17	$4,743	8	$279
	NO	192	$55,751	92	$290
PAY_TYPE	DIRECT	7	$2,264	3	$323
	PROVIDER	206	$58,813	97	$286
REFUNDS		9	$1,543		$171

AVERAGE HOUSEHOLD SIZE: 2.27

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	107	$29,587	51	$277
	FuelOil	70	$20,737	33	$296
	Coal	0	$0	0	$0
	NaturalGas	0	$0	0	$0
	Kerosene	1	$255	0	$255
	Propane	22	$6,375	11	$290
	WoodOrOther	8	$3,340	4	$418
	BlendedFuel	1	$200	0	$200
INCOME RANGE	0 - 999	10	$10,000	5	$1,000
	1000 - 1999	2	$2,000	1	$1,000
	2000 - 2999	1	$1,000	0	$1,000
	3000 - 3999	1	$1,000	0	$1,000
	4000 - 4999	0	$0	0	$0
	5000 - 5999	1	$647	0	$647
	6000 - 6999	0	$0	0	$0
	7000 - 7999	1	$489	0	$489
	8000 - 8999	1	$528	0	$528
	9000 - 9999	6	$2,416	3	$403
	10000 - 10999	5	$1,779	2	$356
	11000 - 11999	20	$5,818	10	$291
	12000 - 12999	32	$8,463	15	$264
	13000 - 13999	12	$2,645	6	$220
	14000 - 14999	12	$2,696	6	$225
	15000 - 15999	12	$2,413	6	$201
	16000 - 16999	11	$2,200	5	$200
	17000 - 17999	10	$2,000	5	$200
	18000 - 18999	10	$2,000	5	$200
	19000 - 19999	5	$1,000	2	$200
	> 19999	57	$11,400	27	$200
PAYMENT TYPE	Regular	209	$60,494		$289
	Reissue	0	$0		$0
	Secondpay	4	$583		$146
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		213	$61,077		$287
RECOUPMENTS		2	$283		$142
NET PAID			$60,794		
PMT SUB TYPE	APD	0	$0		$0
	STD	213	$61,077		$287

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	530	$144,564	47	$273
	Renter	482	$146,980	42	$305
	RenterWithHeat	5	$1,818	0	$364
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	92	$26,036	8	$283
	Roomer	1	$284	0	$284
	Other	29	$10,148	3	$350
RACE	AmericanIndian	4	$816	0	$204
	Other	19	$5,514	2	$290
	NativeHawaiian	1	$200	0	$200
	Black	9	$3,660	1	$407
	White	1,098	$316,904	96	$289
	Asian	3	$852	0	$284
	Unknown	5	$1,884	0	$377
DISABLED	YES	293	$66,437	26	$227
	NO	846	$263,393	74	$311
AGE 60 & ABV	YES	567	$135,246	50	$239
	NO	572	$194,584	50	$340
AGE 5 & BLW	YES	174	$56,911	15	$327
	NO	965	$272,919	85	$283
PAY_TYPE	DIRECT	25	$7,787	2	$311
	PROVIDER	1,133	$328,106	98	$290
REFUNDS		49	$9,722		$198

AVERAGE HOUSEHOLD SIZE: 3.26

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	332	$97,666	29	$294
	FuelOil	451	$126,614	40	$281
	Coal	7	$1,535	1	$219
	NaturalGas	42	$14,019	4	$334
	Kerosene	31	$10,066	3	$325
	Propane	229	$66,289	20	$289
	WoodOrOther	34	$9,523	3	$280
	BlendedFuel	13	$4,118	1	$317
INCOME RANGE	0 - 999	50	$50,000	4	$1,000
	1000 - 1999	5	$5,000	0	$1,000
	2000 - 2999	10	$10,000	1	$1,000
	3000 - 3999	7	$6,544	1	$935
	4000 - 4999	12	$10,382	1	$865
	5000 - 5999	10	$6,980	1	$698
	6000 - 6999	9	$5,396	1	$600
	7000 - 7999	12	$6,201	1	$517
	8000 - 8999	11	$5,087	1	$462
	9000 - 9999	15	$5,992	1	$399
	10000 - 10999	23	$7,669	2	$333
	11000 - 11999	81	$24,920	7	$308
	12000 - 12999	81	$21,058	7	$260
	13000 - 13999	55	$12,664	5	$230
	14000 - 14999	47	$9,730	4	$207
	15000 - 15999	59	$11,807	5	$200
	16000 - 16999	66	$13,200	6	$200
	17000 - 17999	65	$13,000	6	$200
	18000 - 18999	62	$12,400	5	$200
	19000 - 19999	41	$8,200	4	$200
	> 19999	418	$83,600	37	$200
PAYMENT TYPE	Regular	1,139	$329,830		$290
	Reissue	3	$1,320		$440
	Secondpay	16	$4,743		$296
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,158	$335,893		$290
RECOUPMENTS		23	$3,899		$170
NET PAID			$331,994		
PMT SUB TYPE	APD	0	$0		$0
	STD	1,158	$335,893		$290

Energy Assistance Summary (EASUM)

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County 59

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	535	$144,656	48	$270
	Renter	469	$147,228	42	$314
	RenterWithHeat	5	$1,095	0	$219
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	69	$26,163	6	$379
	Roomer	1	$200	0	$200
	Other	33	$11,755	3	$356
RACE	AmericanIndian	5	$1,180	0	$236
	Other	13	$2,980	1	$229
	NativeHawaiian	0	$0	0	$0
	Black	12	$3,141	1	$262
	White	1,073	$320,240	96	$298
	Asian	1	$200	0	$200
	Unknown	8	$3,356	1	$420
DISABLED	YES	315	$74,313	28	$236
	NO	797	$256,784	72	$322
AGE 60 & ABV	YES	527	$123,378	47	$234
	NO	585	$207,719	53	$355
AGE 5 & BLW	YES	179	$55,580	16	$311
	NO	933	$275,517	84	$295
PAY_TYPE	DIRECT	35	$12,329	3	$352
	PROVIDER	1,078	$319,053	97	$296
REFUNDS		25	$4,722		$189

AVERAGE HOUSEHOLD SIZE: 3.4

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	310	$96,736	28	$312
	FuelOil	39	$13,123	4	$336
	Coal	25	$6,605	2	$264
	NaturalGas	617	$178,967	55	$290
	Kerosene	1	$205	0	$205
	Propane	87	$26,529	8	$305
	WoodOrOther	32	$8,732	3	$273
	BlendedFuel	1	$200	0	$200
INCOME RANGE	0 - 999	65	$65,000	6	$1,000
	1000 - 1999	8	$8,000	1	$1,000
	2000 - 2999	4	$4,000	0	$1,000
	3000 - 3999	4	$3,639	0	$910
	4000 - 4999	13	$10,626	1	$817
	5000 - 5999	7	$4,538	1	$648
	6000 - 6999	10	$5,909	1	$591
	7000 - 7999	18	$9,182	2	$510
	8000 - 8999	22	$9,686	2	$440
	9000 - 9999	13	$4,944	1	$380
	10000 - 10999	27	$8,823	2	$327
	11000 - 11999	80	$23,288	7	$291
	12000 - 12999	85	$21,156	8	$249
	13000 - 13999	44	$9,535	4	$217
	14000 - 14999	49	$10,066	4	$205
	15000 - 15999	32	$6,484	3	$203
	16000 - 16999	49	$9,821	4	$200
	17000 - 17999	61	$12,200	5	$200
	18000 - 18999	50	$10,000	4	$200
	19000 - 19999	49	$9,800	4	$200
	> 19999	422	$84,400	38	$200
PAYMENT TYPE	Regular	1,112	$331,097		$298
	Reissue	0	$0		$0
	Secondpay	1	$285		$285
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,113	$331,382		$298
RECOUPMENTS		0	$0		$0
NET PAID			$331,382		
PMT SUB TYPE	APD	0	$0		$0
	STD	1,113	$331,382		$298

Energy Assistance Summary (EASUM)

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County 60

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	258	$64,735	32	$251
	Renter	328	$95,451	41	$291
	RenterWithHeat	1	$200	0	$200
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	213	$56,726	26	$266
	Roomer	0	$0	0	$0
	Other	8	$4,670	1	$584
RACE	AmericanIndian	3	$1,890	0	$630
	Other	25	$7,428	3	$297
	NativeHawaiian	1	$1,000	0	$1,000
	Black	44	$13,723	5	$312
	White	724	$195,462	90	$270
	Asian	3	$644	0	$215
	Unknown	8	$1,635	1	$204
DISABLED	YES	186	$42,554	23	$229
	NO	622	$179,228	77	$288
AGE 60 & ABV	YES	395	$90,834	49	$230
	NO	413	$130,948	51	$317
AGE 5 & BLW	YES	107	$35,498	13	$332
	NO	701	$186,284	87	$266
PAY_TYPE	DIRECT	9	$2,393	1	$266
	PROVIDER	812	$221,697	99	$273
REFUNDS		41	$11,449		$279

AVERAGE HOUSEHOLD SIZE: 2.55

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	448	$127,177	55	$284
	FuelOil	259	$69,424	32	$268
	Coal	1	$652	0	$652
	NaturalGas	25	$6,288	3	$252
	Kerosene	1	$200	0	$200
	Propane	70	$17,241	9	$246
	WoodOrOther	4	$800	0	$200
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	37	$36,200	5	$978
	1000 - 1999	5	$5,000	1	$1,000
	2000 - 2999	4	$3,594	0	$898
	3000 - 3999	5	$3,893	1	$779
	4000 - 4999	4	$2,792	0	$698
	5000 - 5999	4	$2,744	0	$686
	6000 - 6999	9	$4,594	1	$510
	7000 - 7999	7	$3,358	1	$480
	8000 - 8999	7	$3,100	1	$443
	9000 - 9999	15	$5,121	2	$341
	10000 - 10999	14	$4,193	2	$300
	11000 - 11999	58	$15,624	7	$269
	12000 - 12999	67	$15,931	8	$238
	13000 - 13999	40	$8,559	5	$214
	14000 - 14999	51	$10,813	6	$212
	15000 - 15999	42	$8,466	5	$202
	16000 - 16999	40	$8,000	5	$200
	17000 - 17999	49	$9,800	6	$200
	18000 - 18999	40	$8,000	5	$200
	19000 - 19999	54	$10,800	7	$200
	> 19999	256	$51,200	32	$200
PAYMENT TYPE	Regular	808	$221,782		$274
	Reissue	2	$300		$150
	Secondpay	11	$2,008		$183
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		821	$224,090		$273
RECOUPMENTS		1	$200		$200
NET PAID			$223,890		
PMT SUB TYPE	APD	0	$0		$0
	STD	821	$224,090		$273

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	893	$242,203	49	$271
	Renter	628	$180,458	34	$287
	RenterWithHeat	7	$4,282	0	$612
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	267	$88,784	15	$333
	Roomer	2	$400	0	$200
	Other	38	$11,665	2	$307
RACE	AmericanIndian	9	$2,170	0	$241
	Other	24	$6,795	1	$283
	NativeHawaiian	2	$681	0	$340
	Black	41	$12,916	2	$315
	White	1,749	$503,160	95	$288
	Asian	1	$200	0	$200
	Unknown	9	$1,870	0	$208
DISABLED	YES	604	$137,722	33	$228
	NO	1,231	$390,070	67	$317
AGE 60 & ABV	YES	866	$206,004	47	$238
	NO	969	$321,788	53	$332
AGE 5 & BLW	YES	239	$76,604	13	$321
	NO	1,596	$451,188	87	$283
PAY_TYPE	DIRECT	23	$8,333	1	$362
	PROVIDER	1,820	$521,171	99	$286
REFUNDS		72	$13,712		$190

AVERAGE HOUSEHOLD SIZE: 3.18

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	537	$164,852	29	$307
	FuelOil	58	$15,387	3	$265
	Coal	5	$1,836	0	$367
	NaturalGas	1,048	$291,858	57	$278
	Kerosene	5	$2,731	0	$546
	Propane	145	$35,114	8	$242
	WoodOrOther	35	$15,614	2	$446
	BlendedFuel	2	$400	0	$200
INCOME RANGE	0 - 999	95	$94,200	5	$992
	1000 - 1999	12	$12,000	1	$1,000
	2000 - 2999	12	$12,000	1	$1,000
	3000 - 3999	15	$13,282	1	$885
	4000 - 4999	16	$12,388	1	$774
	5000 - 5999	15	$9,322	1	$621
	6000 - 6999	11	$5,972	1	$543
	7000 - 7999	19	$8,926	1	$470
	8000 - 8999	20	$8,265	1	$413
	9000 - 9999	23	$8,294	1	$361
	10000 - 10999	39	$12,210	2	$313
	11000 - 11999	158	$43,073	9	$273
	12000 - 12999	194	$45,992	11	$237
	13000 - 13999	74	$15,432	4	$209
	14000 - 14999	96	$19,236	5	$200
	15000 - 15999	93	$18,600	5	$200
	16000 - 16999	83	$16,600	5	$200
	17000 - 17999	78	$15,600	4	$200
	18000 - 18999	75	$15,000	4	$200
	19000 - 19999	68	$13,600	4	$200
	> 19999	639	$127,800	35	$200
PAYMENT TYPE	Regular	1,835	$527,792		$288
	Reissue	1	$612		$612
	Secondpay	7	$1,100		$157
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,843	$529,504		$287
RECOUPMENTS		4	$1,332		$333
NET PAID			$528,172		
PMT SUB TYPE	APD	0	$0		$0
	STD	1,843	$529,504		$287

Energy Assistance Summary (EASUM)

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County 62

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	521	$139,560	54	$268
	Renter	392	$108,197	40	$276
	RenterWithHeat	9	$2,523	1	$280
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	24	$6,186	2	$258
	Roomer	1	$270	0	$270
	Other	25	$9,458	3	$378
RACE	AmericanIndian	1	$272	0	$272
	Other	8	$3,685	1	$461
	NativeHawaiian	1	$277	0	$277
	Black	15	$4,104	2	$274
	White	941	$256,584	97	$273
	Asian	0	$0	0	$0
	Unknown	6	$1,272	1	$212
DISABLED	YES	293	$67,249	30	$230
	NO	679	$198,945	70	$293
AGE 60 & ABV	YES	474	$112,302	49	$237
	NO	498	$153,892	51	$309
AGE 5 & BLW	YES	115	$30,137	12	$262
	NO	857	$236,057	88	$275
PAY_TYPE	DIRECT	20	$6,319	2	$316
	PROVIDER	957	$261,379	98	$273
REFUNDS		44	$10,964		$249

AVERAGE HOUSEHOLD SIZE: 3.03

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	230	$66,164	24	$288
	FuelOil	13	$3,606	1	$277
	Coal	1	$200	0	$200
	NaturalGas	530	$141,072	55	$266
	Kerosene	1	$200	0	$200
	Propane	164	$45,920	17	$280
	WoodOrOther	33	$9,032	3	$274
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	39	$39,000	4	$1,000
	1000 - 1999	3	$3,000	0	$1,000
	2000 - 2999	8	$8,000	1	$1,000
	3000 - 3999	6	$5,208	1	$868
	4000 - 4999	6	$4,628	1	$771
	5000 - 5999	5	$3,086	1	$617
	6000 - 6999	7	$3,753	1	$536
	7000 - 7999	14	$6,560	1	$469
	8000 - 8999	7	$2,914	1	$416
	9000 - 9999	16	$5,747	2	$359
	10000 - 10999	21	$6,563	2	$313
	11000 - 11999	74	$20,095	8	$272
	12000 - 12999	110	$26,196	11	$238
	13000 - 13999	38	$7,843	4	$206
	14000 - 14999	43	$8,601	4	$200
	15000 - 15999	41	$8,200	4	$200
	16000 - 16999	51	$10,200	5	$200
	17000 - 17999	43	$8,600	4	$200
	18000 - 18999	56	$11,200	6	$200
	19000 - 19999	42	$8,400	4	$200
	> 19999	342	$68,400	35	$200
PAYMENT TYPE	Regular	972	$266,194		$274
	Reissue	1	$100		$100
	Secondpay	3	$1,300		$433
	Underpay	1	$104		$104
	Extraordinary	0	$0		$0
TOTAL PMT		977	$267,698		$274
RECOUPMENTS		0	$0		$0
NET PAID			$267,698		
PMT SUB TYPE	APD	0	$0		$0
	STD	977	$267,698		$274

Energy Assistance Summary (EASUM)

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County 63

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,857	$514,825	46	$277
	Renter	1,787	$553,170	44	$310
	RenterWithHeat	17	$5,545	0	$326
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	324	$118,136	8	$365
	Roomer	0	$0	0	$0
	Other	72	$28,124	2	$391
RACE	AmericanIndian	7	$3,589	0	$513
	Other	55	$20,707	1	$376
	NativeHawaiian	4	$800	0	$200
	Black	343	$110,515	8	$322
	White	3,586	$1,064,461	88	$297
	Asian	12	$3,267	0	$272
	Unknown	50	$16,461	1	$329
DISABLED	YES	1,127	$247,103	28	$219
	NO	2,930	$972,697	72	$332
AGE 60 & ABV	YES	1,882	$441,229	46	$234
	NO	2,175	$778,571	54	$358
AGE 5 & BLW	YES	563	$184,733	14	$328
	NO	3,494	$1,035,067	86	$296
PAY_TYPE	DIRECT	23	$7,198	1	$313
	PROVIDER	4,069	$1,216,736	99	$299
REFUNDS		109	$19,925		$183

AVERAGE HOUSEHOLD SIZE: 2.91

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	1,655	$521,573	41	$315
	FuelOil	444	$136,799	11	$308
	Coal	0	$0	0	$0
	NaturalGas	1,787	$512,971	44	$287
	Kerosene	84	$23,801	2	$283
	Propane	79	$21,951	2	$278
	WoodOrOther	8	$2,705	0	$338
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	261	$261,000	6	$1,000
	1000 - 1999	35	$35,000	1	$1,000
	2000 - 2999	33	$32,224	1	$976
	3000 - 3999	43	$34,212	1	$796
	4000 - 4999	39	$27,344	1	$701
	5000 - 5999	46	$26,539	1	$577
	6000 - 6999	60	$29,642	1	$494
	7000 - 7999	52	$22,920	1	$441
	8000 - 8999	58	$22,492	1	$388
	9000 - 9999	78	$25,305	2	$324
	10000 - 10999	89	$25,399	2	$285
	11000 - 11999	339	$85,438	8	$252
	12000 - 12999	386	$84,174	10	$218
	13000 - 13999	152	$30,883	4	$203
	14000 - 14999	184	$36,828	5	$200
	15000 - 15999	190	$38,000	5	$200
	16000 - 16999	157	$31,400	4	$200
	17000 - 17999	198	$39,600	5	$200
	18000 - 18999	183	$36,600	5	$200
	19000 - 19999	182	$36,400	4	$200
	> 19999	1,292	$258,400	32	$200
PAYMENT TYPE	Regular	4,057	$1,219,800		$301
	Reissue	0	$0		$0
	Secondpay	29	$3,534		$122
	Underpay	0	$0		$0
	Extraordinary	6	$600		$100
TOTAL PMT		4,092	$1,223,934		$299
RECOUPMENTS		6	$1,051		$175
NET PAID			$1,222,883		
PMT SUB TYPE	APD	0	$0		$0
	STD	4,092	$1,223,934		$299

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	654	$179,399	51	$274
	Renter	510	$150,335	40	$295
	RenterWithHeat	7	$2,314	1	$331
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	91	$25,747	7	$283
	Roomer	0	$0	0	$0
	Other	26	$7,899	2	$304
RACE	AmericanIndian	6	$2,219	0	$370
	Other	45	$16,208	3	$360
	NativeHawaiian	2	$1,223	0	$612
	Black	15	$4,836	1	$322
	White	1,197	$332,772	93	$278
	Asian	7	$1,624	1	$232
	Unknown	16	$6,812	1	$426
DISABLED	YES	295	$68,514	23	$232
	NO	993	$297,180	77	$299
AGE 60 & ABV	YES	685	$169,224	53	$247
	NO	603	$196,470	47	$326
AGE 5 & BLW	YES	155	$47,934	12	$309
	NO	1,133	$317,760	88	$280
PAY_TYPE	DIRECT	5	$1,638	0	$328
	PROVIDER	1,293	$366,452	100	$283
REFUNDS		46	$8,634		$188

AVERAGE HOUSEHOLD SIZE: 2.73

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	457	$125,463	35	$275
	FuelOil	385	$113,515	30	$295
	Coal	6	$1,374	0	$229
	NaturalGas	115	$32,142	9	$279
	Kerosene	22	$7,078	2	$322
	Propane	258	$71,858	20	$279
	WoodOrOther	20	$7,019	2	$351
	BlendedFuel	25	$7,245	2	$290
INCOME RANGE	0 - 999	52	$52,000	4	$1,000
	1000 - 1999	5	$5,000	0	$1,000
	2000 - 2999	5	$5,000	0	$1,000
	3000 - 3999	8	$7,634	1	$954
	4000 - 4999	10	$8,920	1	$892
	5000 - 5999	9	$6,018	1	$669
	6000 - 6999	12	$7,315	1	$610
	7000 - 7999	15	$7,554	1	$504
	8000 - 8999	21	$9,728	2	$463
	9000 - 9999	21	$8,139	2	$388
	10000 - 10999	21	$7,409	2	$353
	11000 - 11999	94	$28,682	7	$305
	12000 - 12999	102	$26,937	8	$264
	13000 - 13999	63	$14,654	5	$233
	14000 - 14999	64	$13,488	5	$211
	15000 - 15999	58	$11,616	5	$200
	16000 - 16999	71	$14,200	6	$200
	17000 - 17999	68	$13,600	5	$200
	18000 - 18999	59	$11,800	5	$200
	19000 - 19999	76	$15,200	6	$200
	> 19999	454	$90,800	35	$200
PAYMENT TYPE	Regular	1,288	$365,694		$284
	Reissue	4	$1,396		$349
	Secondpay	6	$1,000		$167
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,298	$368,090		$284
RECOUPMENTS		3	$566		$189
NET PAID			$367,524		
PMT SUB TYPE	APD	0	$0		$0
	STD	1,298	$368,090		$284

Energy Assistance Summary (EASUM)

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County 65

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	3,716	$1,004,567	46	$270
	Renter	3,320	$978,041	41	$295
	RenterWithHeat	67	$15,541	1	$232
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	893	$292,465	11	$328
	Roomer	1	$386	0	$386
	Other	160	$52,047	2	$325
RACE	AmericanIndian	20	$5,390	0	$270
	Other	144	$42,449	2	$295
	NativeHawaiian	6	$2,243	0	$374
	Black	494	$160,319	6	$325
	White	7,386	$2,100,902	91	$284
	Asian	18	$6,425	0	$357
	Unknown	89	$25,319	1	$284
DISABLED	YES	2,107	$476,070	26	$226
	NO	6,050	$1,866,977	74	$309
AGE 60 & ABV	YES	4,067	$941,414	50	$231
	NO	4,090	$1,401,633	50	$343
AGE 5 & BLW	YES	974	$308,740	12	$317
	NO	7,183	$2,034,307	88	$283
PAY_TYPE	DIRECT	84	$25,472	1	$303
	PROVIDER	8,175	$2,337,439	99	$286
REFUNDS		227	$42,344		$187

AVERAGE HOUSEHOLD SIZE: 2.79

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	2,743	$829,772	34	$303
	FuelOil	1,441	$401,835	18	$279
	Coal	9	$1,800	0	$200
	NaturalGas	3,364	$943,358	41	$280
	Kerosene	228	$59,662	3	$262
	Propane	322	$88,586	4	$275
	WoodOrOther	34	$13,100	0	$385
	BlendedFuel	16	$4,934	0	$308
INCOME RANGE	0 - 999	420	$417,340	5	$994
	1000 - 1999	65	$65,000	1	$1,000
	2000 - 2999	54	$54,000	1	$1,000
	3000 - 3999	56	$48,167	1	$860
	4000 - 4999	52	$38,866	1	$747
	5000 - 5999	76	$46,232	1	$608
	6000 - 6999	78	$40,659	1	$521
	7000 - 7999	105	$48,087	1	$458
	8000 - 8999	105	$42,188	1	$402
	9000 - 9999	158	$54,758	2	$347
	10000 - 10999	171	$52,483	2	$307
	11000 - 11999	678	$180,653	8	$266
	12000 - 12999	763	$177,204	9	$232
	13000 - 13999	353	$72,801	4	$206
	14000 - 14999	410	$82,009	5	$200
	15000 - 15999	357	$71,400	4	$200
	16000 - 16999	362	$72,400	4	$200
	17000 - 17999	378	$75,600	5	$200
	18000 - 18999	391	$78,200	5	$200
	19000 - 19999	385	$77,000	5	$200
	> 19999	2,740	$548,000	34	$200
PAYMENT TYPE	Regular	8,157	$2,343,047		$287
	Reissue	4	$624		$156
	Secondpay	88	$18,369		$209
	Underpay	2	$71		$36
	Extraordinary	8	$800		$100
TOTAL PMT		8,259	$2,362,911		$286
RECOUPMENTS		9	$2,264		$252
NET PAID			$2,360,647		
PMT SUB TYPE	APD	0	$0		$0
	STD	8,259	$2,362,911		$286

Energy Assistance Summary (EASUM)

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Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	341	$98,545	43	$289
	Renter	315	$90,941	40	$289
	RenterWithHeat	6	$1,200	1	$200
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	104	$35,225	13	$339
	Roomer	0	$0	0	$0
	Other	20	$5,623	3	$281
RACE	AmericanIndian	2	$486	0	$243
	Other	14	$3,374	2	$241
	NativeHawaiian	1	$200	0	$200
	Black	6	$1,987	1	$331
	White	760	$224,857	97	$296
	Asian	1	$216	0	$216
	Unknown	2	$414	0	$207
DISABLED	YES	213	$51,288	27	$241
	NO	573	$180,246	73	$315
AGE 60 & ABV	YES	395	$98,920	50	$250
	NO	391	$132,614	50	$339
AGE 5 & BLW	YES	111	$34,004	14	$306
	NO	675	$197,530	86	$293
PAY_TYPE	DIRECT	8	$1,703	1	$213
	PROVIDER	792	$231,817	99	$293
REFUNDS		21	$5,039		$240

AVERAGE HOUSEHOLD SIZE: 2.88

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	259	$79,294	33	$306
	FuelOil	280	$84,147	36	$301
	Coal	6	$1,489	1	$248
	NaturalGas	9	$2,075	1	$231
	Kerosene	23	$6,551	3	$285
	Propane	184	$50,040	23	$272
	WoodOrOther	13	$3,725	2	$287
	BlendedFuel	12	$4,213	2	$351
INCOME RANGE	0 - 999	15	$15,000	2	$1,000
	1000 - 1999	9	$9,000	1	$1,000
	2000 - 2999	10	$10,000	1	$1,000
	3000 - 3999	11	$10,213	1	$928
	4000 - 4999	7	$6,360	1	$909
	5000 - 5999	9	$6,040	1	$671
	6000 - 6999	11	$6,859	1	$624
	7000 - 7999	8	$4,039	1	$505
	8000 - 8999	11	$5,574	1	$507
	9000 - 9999	11	$4,616	1	$420
	10000 - 10999	13	$4,832	2	$372
	11000 - 11999	72	$22,082	9	$307
	12000 - 12999	73	$20,283	9	$278
	13000 - 13999	26	$6,020	3	$232
	14000 - 14999	32	$6,954	4	$217
	15000 - 15999	38	$7,662	5	$202
	16000 - 16999	40	$8,000	5	$200
	17000 - 17999	29	$5,800	4	$200
	18000 - 18999	37	$7,400	5	$200
	19000 - 19999	35	$7,000	4	$200
	> 19999	289	$57,800	37	$200
PAYMENT TYPE	Regular	786	$231,534		$295
	Reissue	1	$100		$100
	Secondpay	11	$1,762		$160
	Underpay	2	$124		$62
	Extraordinary	0	$0		$0
TOTAL PMT		800	$233,520		$292
RECOUPMENTS		6	$740		$123
NET PAID			$232,780		
PMT SUB TYPE	APD	0	$0		$0
	STD	800	$233,520		$292

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 67

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,919	$464,414	38	$242
	Renter	2,614	$659,286	52	$252
	RenterWithHeat	80	$19,427	2	$243
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	345	$95,378	7	$276
	Roomer	2	$968	0	$484
	Other	47	$13,620	1	$290
RACE	AmericanIndian	26	$6,299	1	$242
	Other	746	$185,230	15	$248
	NativeHawaiian	15	$3,807	0	$254
	Black	704	$187,650	14	$267
	White	3,320	$817,522	66	$246
	Asian	33	$7,700	1	$233
	Unknown	163	$44,885	3	$275
DISABLED	YES	1,272	$270,269	25	$212
	NO	3,735	$982,824	75	$263
AGE 60 & ABV	YES	2,089	$458,186	42	$219
	NO	2,918	$794,907	58	$272
AGE 5 & BLW	YES	1,001	$261,645	20	$261
	NO	4,006	$991,448	80	$247
PAY_TYPE	DIRECT	107	$25,757	2	$241
	PROVIDER	4,927	$1,232,626	98	$250
REFUNDS		134	$21,212		$158

AVERAGE HOUSEHOLD SIZE: 3.25

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	2,134	$543,244	43	$255
	FuelOil	596	$163,868	12	$275
	Coal	2	$400	0	$200
	NaturalGas	1,884	$456,008	38	$242
	Kerosene	14	$3,269	0	$234
	Propane	363	$83,005	7	$229
	WoodOrOther	14	$3,299	0	$236
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	130	$130,000	3	$1,000
	1000 - 1999	13	$12,950	0	$996
	2000 - 2999	26	$24,301	1	$935
	3000 - 3999	33	$24,910	1	$755
	4000 - 4999	32	$21,528	1	$673
	5000 - 5999	41	$22,149	1	$540
	6000 - 6999	31	$14,960	1	$483
	7000 - 7999	51	$22,347	1	$438
	8000 - 8999	44	$16,492	1	$375
	9000 - 9999	81	$26,840	2	$331
	10000 - 10999	98	$28,839	2	$294
	11000 - 11999	301	$74,437	6	$247
	12000 - 12999	351	$75,563	7	$215
	13000 - 13999	224	$46,575	4	$208
	14000 - 14999	224	$45,710	4	$204
	15000 - 15999	220	$44,092	4	$200
	16000 - 16999	218	$43,600	4	$200
	17000 - 17999	244	$48,800	5	$200
	18000 - 18999	254	$50,800	5	$200
	19000 - 19999	260	$52,000	5	$200
	> 19999	2,131	$426,200	43	$200
PAYMENT TYPE	Regular	5,007	$1,253,093		$250
	Reissue	8	$1,423		$178
	Secondpay	19	$3,867		$204
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		5,034	$1,258,383		$250
RECOUPMENTS		1	$200		$200
NET PAID			$1,258,183		
PMT SUB TYPE	APD	0	$0		$0
	STD	5,034	$1,258,383		$250

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

STATE WIDE

Cash Demographic Report (LIH660-R01)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	98,599	$26,322,345	39	$267
	Renter	113,494	$32,652,277	45	$288
	RenterWithHeat	2,549	$701,272	1	$275
	SubsidizedWithHeat	65	$18,863	0	$290
	SubsidizedNoHeat	31,684	$10,016,778	13	$316
	Roomer	194	$66,296	0	$342
	Other	3,474	$1,200,816	1	$346
RACE	AmericanIndian	769	$263,269	0	$342
	Other	21,946	$6,108,747	9	$278
	NativeHawaiian	447	$141,065	0	$316
	Black	56,117	$16,676,278	22	$297
	White	161,416	$45,251,538	65	$280
	Asian	4,967	$1,291,266	2	$260
	Unknown	4,397	$1,246,484	2	$283
DISABLED	YES	67,701	$15,151,606	27	$224
	NO	182,358	$55,827,041	73	$306
AGE 60 & ABV	YES	116,337	$26,882,250	47	$231
	NO	133,722	$44,096,397	53	$330
AGE 5 & BLW	YES	38,671	$11,895,091	15	$308
	NO	211,388	$59,083,556	85	$280
PAY_TYPE	DIRECT	3,333	$1,012,120	1	$304
	PROVIDER	248,308	$70,324,662	99	$283
REFUNDS		6,490	$1,375,898		$212

AVERAGE HOUSEHOLD SIZE: 3

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	91,417	$26,978,683	37	$295
	FuelOil	41,035	$11,585,713	16	$282
	Coal	1,191	$315,436	0	$265
	NaturalGas	102,767	$28,301,435	41	$275
	Kerosene	1,826	$512,163	1	$280
	Propane	10,185	$2,775,858	4	$273
	WoodOrOther	1,138	$359,482	0	$316
	BlendedFuel	500	$149,877	0	$300
INCOME RANGE	0 - 999	11,834	$11,794,471	5	$997
	1000 - 1999	1,945	$1,942,310	1	$999
	2000 - 2999	1,933	$1,880,479	1	$973
	3000 - 3999	2,139	$1,746,978	1	$817
	4000 - 4999	2,211	$1,607,099	1	$727
	5000 - 5999	2,208	$1,290,438	1	$584
	6000 - 6999	2,527	$1,293,645	1	$512
	7000 - 7999	2,962	$1,317,741	1	$445
	8000 - 8999	3,353	$1,308,329	1	$390
	9000 - 9999	4,091	$1,390,102	2	$340
	10000 - 10999	5,444	$1,613,996	2	$296
	11000 - 11999	22,695	$5,789,027	9	$255
	12000 - 12999	23,809	$5,323,006	10	$224
	13000 - 13999	10,333	$2,146,331	4	$208
	14000 - 14999	11,035	$2,223,526	4	$201
	15000 - 15999	10,866	$2,174,748	4	$200
	16000 - 16999	10,942	$2,188,421	4	$200
	17000 - 17999	11,614	$2,322,800	5	$200
	18000 - 18999	11,568	$2,313,600	5	$200
	19000 - 19999	11,137	$2,227,400	4	$200
	> 19999	85,410	$17,082,000	34	$200
PAYMENT TYPE	Regular	250,059	$70,978,647		$284
	Reissue	227	$45,860		$202
	Secondpay	1,247	$290,745		$233
	Underpay	49	$10,591		$216
	Extraordinary	59	$10,939		$185
TOTAL PMT		251,641	$71,336,782		$283
RECOUPMENTS		420	$90,158		$215
NET PAID			$71,246,624		
PMT SUB TYPE	APD	0	$0		$0
	STD	251,641	$71,336,782		$283

* Counts, Amounts ($), % and AVG from HOUSING, RACE, DISABLED, OVER-60 and INCOME RANGE category are from Regular payments only

** Counts, Amounts ($), % and AVG from PAY_TYPE category are from All Payment Types (Regular, Reissue, Secondpay, Underpay and Extraordinary)

*** Counts, Amounts ($), % and AVG from PAYMENT_SENT category are from All Payment Types (Regular, Reissue, Secondpay, Underpay and Extraordinary)

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 01

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	225	$111,426	51	$495
	Renter	185	$94,150	42	$509
	RenterWithHeat	1	$245	0	$245
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	22	$10,007	5	$455
	Roomer	0	$0	0	$0
	Other	9	$4,732	2	$526
RACE	AmericanIndian	0	$0	0	$0
	Other	18	$10,433	4	$580
	NativeHawaiian	2	$1,000	0	$500
	Black	15	$6,346	3	$423
	White	401	$200,333	91	$500
	Asian	0	$0	0	$0
	Unknown	6	$2,448	1	$408
DISABLED	YES	104	$50,539	24	$486
	NO	338	$170,022	76	$503
AGE 60 & ABV	YES	220	$103,945	50	$472
	NO	222	$116,616	50	$525
AGE 5 & BLW	YES	71	$37,441	16	$527
	NO	371	$183,120	84	$494
PAY_TYPE	DIRECT	2	$1,250	0	$625
	PROVIDER	440	$219,311	100	$498
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.31

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	65	$33,277	15	$512
	FuelOil	210	$110,460	48	$526
	Coal	1	$1,000	0	$1,000
	NaturalGas	23	$10,810	5	$470
	Kerosene	6	$4,459	1	$743
	Propane	133	$57,310	30	$431
	WoodOrOther	4	$3,245	1	$811
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	6	$3,781	1	$630
	1000 - 1999	4	$1,502	1	$376
	2000 - 2999	0	$0	0	$0
	3000 - 3999	0	$0	0	$0
	4000 - 4999	2	$1,000	0	$500
	5000 - 5999	1	$658	0	$658
	6000 - 6999	0	$0	0	$0
	7000 - 7999	1	$882	0	$882
	8000 - 8999	6	$3,493	1	$582
	9000 - 9999	7	$3,053	2	$436
	10000 - 10999	2	$1,000	0	$500
	11000 - 11999	19	$9,772	4	$514
	12000 - 12999	26	$13,023	6	$501
	13000 - 13999	20	$9,600	5	$480
	14000 - 14999	14	$5,580	3	$399
	15000 - 15999	33	$15,069	7	$457
	16000 - 16999	18	$8,657	4	$481
	17000 - 17999	20	$10,480	5	$524
	18000 - 18999	23	$13,497	5	$587
	19000 - 19999	17	$8,383	4	$493
	> 19999	222	$110,880	50	$499
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	442	$220,561		$499
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		442	$220,561		$499
RECOUPMENTS		0	$0		$0
NET PAID			$220,561		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 02

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	626	$346,648	25	$554
	Renter	1,214	$670,627	49	$552
	RenterWithHeat	16	$7,390	1	$462
	SubsidizedWithHeat	18	$10,865	1	$604
	SubsidizedNoHeat	600	$324,919	24	$542
	Roomer	0	$0	0	$0
	Other	24	$15,241	1	$635
RACE	AmericanIndian	13	$5,601	1	$431
	Other	42	$25,640	2	$610
	NativeHawaiian	0	$0	0	$0
	Black	1,375	$773,504	55	$563
	White	1,024	$542,816	41	$530
	Asian	11	$7,116	0	$647
	Unknown	33	$21,012	1	$637
DISABLED	YES	687	$365,607	28	$532
	NO	1,811	$1,010,083	72	$558
AGE 60 & ABV	YES	688	$357,913	28	$520
	NO	1,810	$1,017,776	72	$562
AGE 5 & BLW	YES	532	$310,672	21	$584
	NO	1,966	$1,065,017	79	$542
PAY_TYPE	DIRECT	0	$0	0	$0
	PROVIDER	2,498	$1,375,690	100	$551
REFUNDS		9	$1,754		$195

AVERAGE HOUSEHOLD SIZE: 3.52

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	1,016	$622,865	41	$613
	FuelOil	183	$124,827	7	$682
	Coal	0	$0	0	$0
	NaturalGas	1,238	$593,366	50	$479
	Kerosene	27	$16,346	1	$605
	Propane	33	$17,802	1	$539
	WoodOrOther	0	$0	0	$0
	BlendedFuel	1	$483	0	$483
INCOME RANGE	0 - 999	158	$90,416	6	$572
	1000 - 1999	20	$10,119	1	$506
	2000 - 2999	26	$13,217	1	$508
	3000 - 3999	36	$23,248	1	$646
	4000 - 4999	32	$16,886	1	$528
	5000 - 5999	24	$16,392	1	$683
	6000 - 6999	35	$19,490	1	$557
	7000 - 7999	33	$16,964	1	$514
	8000 - 8999	30	$16,850	1	$562
	9000 - 9999	33	$18,080	1	$548
	10000 - 10999	54	$28,109	2	$521
	11000 - 11999	169	$91,063	7	$539
	12000 - 12999	188	$99,490	8	$529
	13000 - 13999	84	$40,748	3	$485
	14000 - 14999	93	$48,253	4	$519
	15000 - 15999	86	$46,161	3	$537
	16000 - 16999	89	$49,618	4	$558
	17000 - 17999	82	$42,310	3	$516
	18000 - 18999	95	$52,663	4	$554
	19000 - 19999	85	$41,409	3	$487
	> 19999	1,046	$594,203	42	$568
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	2,498	$1,375,690		$551
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		2,498	$1,375,690		$551
RECOUPMENTS		0	$0		$0
NET PAID			$1,375,690		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 03

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	284	$170,847	57	$602
	Renter	192	$110,836	39	$577
	RenterWithHeat	1	$884	0	$884
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	10	$5,133	2	$513
	Roomer	0	$0	0	$0
	Other	8	$6,780	2	$848
RACE	AmericanIndian	1	$723	0	$723
	Other	7	$2,833	1	$405
	NativeHawaiian	0	$0	0	$0
	Black	3	$799	1	$266
	White	483	$289,128	98	$599
	Asian	0	$0	0	$0
	Unknown	1	$998	0	$998
DISABLED	YES	177	$105,376	36	$595
	NO	318	$189,105	64	$595
AGE 60 & ABV	YES	225	$136,699	45	$608
	NO	270	$157,782	55	$584
AGE 5 & BLW	YES	61	$37,894	12	$621
	NO	434	$256,587	88	$591
PAY_TYPE	DIRECT	11	$2,900	2	$264
	PROVIDER	484	$291,581	98	$602
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.46

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	121	$65,549	24	$542
	FuelOil	166	$117,021	34	$705
	Coal	4	$2,486	1	$622
	NaturalGas	67	$34,535	14	$515
	Kerosene	20	$14,172	4	$709
	Propane	106	$51,918	21	$490
	WoodOrOther	9	$7,628	2	$848
	BlendedFuel	2	$1,172	0	$586
INCOME RANGE	0 - 999	24	$11,571	5	$482
	1000 - 1999	1	$908	0	$908
	2000 - 2999	6	$4,126	1	$688
	3000 - 3999	4	$2,057	1	$514
	4000 - 4999	2	$1,699	0	$850
	5000 - 5999	1	$591	0	$591
	6000 - 6999	0	$0	0	$0
	7000 - 7999	9	$5,960	2	$662
	8000 - 8999	2	$1,037	0	$518
	9000 - 9999	3	$1,842	1	$614
	10000 - 10999	9	$5,108	2	$568
	11000 - 11999	41	$24,431	8	$596
	12000 - 12999	51	$30,591	10	$600
	13000 - 13999	11	$7,603	2	$691
	14000 - 14999	14	$9,027	3	$645
	15000 - 15999	14	$8,504	3	$607
	16000 - 16999	23	$15,513	5	$674
	17000 - 17999	12	$8,722	2	$727
	18000 - 18999	22	$13,066	4	$594
	19000 - 19999	16	$9,923	3	$620
	> 19999	230	$132,202	46	$575
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	495	$294,481		$595
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		495	$294,481		$595
RECOUPMENTS		0	$0		$0
NET PAID			$294,481		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 04

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	427	$274,862	42	$644
	Renter	511	$302,859	51	$593
	RenterWithHeat	4	$2,434	0	$608
	SubsidizedWithHeat	1	$275	0	$275
	SubsidizedNoHeat	48	$27,314	5	$569
	Roomer	0	$0	0	$0
	Other	20	$13,126	2	$656
RACE	AmericanIndian	0	$0	0	$0
	Other	14	$7,193	1	$514
	NativeHawaiian	1	$125	0	$125
	Black	180	$106,644	18	$592
	White	806	$499,139	80	$619
	Asian	1	$184	0	$184
	Unknown	9	$7,585	1	$843
DISABLED	YES	305	$176,182	30	$578
	NO	706	$444,688	70	$630
AGE 60 & ABV	YES	418	$258,089	41	$617
	NO	593	$362,781	59	$612
AGE 5 & BLW	YES	156	$94,381	15	$605
	NO	855	$526,489	85	$616
PAY_TYPE	DIRECT	2	$214	0	$107
	PROVIDER	1,009	$620,656	100	$615
REFUNDS		2	$380		$190

AVERAGE HOUSEHOLD SIZE: 3.19

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	215	$144,448	21	$672
	FuelOil	337	$244,730	33	$726
	Coal	0	$0	0	$0
	NaturalGas	281	$138,633	28	$493
	Kerosene	33	$19,226	3	$583
	Propane	121	$59,617	12	$493
	WoodOrOther	1	$1,000	0	$1,000
	BlendedFuel	23	$13,216	2	$575
INCOME RANGE	0 - 999	59	$39,999	6	$678
	1000 - 1999	5	$2,961	0	$592
	2000 - 2999	9	$5,851	1	$650
	3000 - 3999	5	$2,417	0	$483
	4000 - 4999	1	$1,000	0	$1,000
	5000 - 5999	5	$2,930	0	$586
	6000 - 6999	7	$4,436	1	$634
	7000 - 7999	6	$4,749	1	$792
	8000 - 8999	10	$4,723	1	$472
	9000 - 9999	8	$4,419	1	$552
	10000 - 10999	11	$7,040	1	$640
	11000 - 11999	71	$42,639	7	$601
	12000 - 12999	80	$46,303	8	$579
	13000 - 13999	33	$21,027	3	$637
	14000 - 14999	40	$28,561	4	$714
	15000 - 15999	19	$11,570	2	$609
	16000 - 16999	53	$29,231	5	$552
	17000 - 17999	36	$20,884	4	$580
	18000 - 18999	52	$30,111	5	$579
	19000 - 19999	50	$28,666	5	$573
	> 19999	450	$280,880	45	$624
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,011	$620,870		$614
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,011	$620,870		$614
RECOUPMENTS		0	$0		$0
NET PAID			$620,870		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 05

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,028	$593,580	53	$577
	Renter	773	$432,487	40	$559
	RenterWithHeat	2	$1,821	0	$910
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	77	$43,279	4	$562
	Roomer	0	$0	0	$0
	Other	67	$38,358	3	$573
RACE	AmericanIndian	4	$3,000	0	$750
	Other	22	$8,209	1	$373
	NativeHawaiian	0	$0	0	$0
	Black	12	$7,878	1	$656
	White	1,898	$1,083,053	97	$571
	Asian	2	$1,000	0	$500
	Unknown	9	$6,385	0	$709
DISABLED	YES	582	$309,568	30	$532
	NO	1,365	$799,957	70	$586
AGE 60 & ABV	YES	1,062	$588,655	55	$554
	NO	885	$520,870	45	$589
AGE 5 & BLW	YES	275	$163,015	14	$593
	NO	1,672	$946,510	86	$566
PAY_TYPE	DIRECT	2	$939	0	$470
	PROVIDER	1,948	$1,109,307	100	$569
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.42

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	68	$45,445	3	$668
	FuelOil	1,569	$913,138	81	$582
	Coal	21	$15,375	1	$732
	NaturalGas	0	$0	0	$0
	Kerosene	46	$29,391	2	$639
	Propane	169	$56,415	9	$334
	WoodOrOther	64	$44,617	3	$697
	BlendedFuel	10	$5,145	1	$514
INCOME RANGE	0 - 999	55	$39,576	3	$720
	1000 - 1999	4	$2,492	0	$623
	2000 - 2999	3	$2,501	0	$834
	3000 - 3999	16	$10,359	1	$647
	4000 - 4999	9	$7,096	0	$788
	5000 - 5999	7	$4,920	0	$703
	6000 - 6999	19	$10,399	1	$547
	7000 - 7999	15	$8,936	1	$596
	8000 - 8999	17	$9,201	1	$541
	9000 - 9999	25	$15,420	1	$617
	10000 - 10999	43	$21,662	2	$504
	11000 - 11999	156	$77,606	8	$497
	12000 - 12999	147	$79,775	8	$543
	13000 - 13999	78	$43,883	4	$563
	14000 - 14999	84	$50,229	4	$598
	15000 - 15999	81	$47,011	4	$580
	16000 - 16999	85	$46,568	4	$548
	17000 - 17999	88	$45,102	5	$513
	18000 - 18999	118	$64,328	6	$545
	19000 - 19999	80	$47,517	4	$594
	> 19999	816	$473,943	42	$581
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,947	$1,109,525		$570
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	3	$720		$240
TOTAL PMT		1,950	$1,110,245		$569
RECOUPMENTS		0	$0		$0
NET PAID			$1,110,245		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 06

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	656	$378,751	44	$577
	Renter	759	$448,836	51	$591
	RenterWithHeat	6	$2,599	0	$433
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	42	$25,119	3	$598
	Roomer	0	$0	0	$0
	Other	15	$8,866	1	$591
RACE	AmericanIndian	1	$581	0	$581
	Other	486	$278,797	33	$574
	NativeHawaiian	3	$2,683	0	$894
	Black	104	$61,615	7	$592
	White	846	$497,050	57	$588
	Asian	3	$1,921	0	$640
	Unknown	35	$21,524	2	$615
DISABLED	YES	346	$192,580	23	$557
	NO	1,132	$671,592	77	$593
AGE 60 & ABV	YES	552	$302,152	37	$547
	NO	926	$562,019	63	$607
AGE 5 & BLW	YES	330	$196,273	22	$595
	NO	1,148	$667,898	78	$582
PAY_TYPE	DIRECT	15	$5,856	1	$390
	PROVIDER	1,463	$858,315	99	$587
REFUNDS		4	$67		$17

AVERAGE HOUSEHOLD SIZE: 3.94

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	237	$137,690	16	$581
	FuelOil	1,040	$612,714	70	$589
	Coal	1	$1,000	0	$1,000
	NaturalGas	66	$54,434	4	$825
	Kerosene	13	$8,624	1	$663
	Propane	120	$49,334	8	$411
	WoodOrOther	0	$0	0	$0
	BlendedFuel	1	$375	0	$375
INCOME RANGE	0 - 999	44	$29,588	3	$672
	1000 - 1999	11	$6,115	1	$556
	2000 - 2999	10	$5,427	1	$543
	3000 - 3999	10	$7,146	1	$715
	4000 - 4999	12	$7,941	1	$662
	5000 - 5999	7	$6,085	0	$869
	6000 - 6999	13	$9,294	1	$715
	7000 - 7999	12	$7,528	1	$627
	8000 - 8999	16	$10,734	1	$671
	9000 - 9999	10	$6,517	1	$652
	10000 - 10999	29	$16,973	2	$585
	11000 - 11999	73	$40,241	5	$551
	12000 - 12999	107	$56,479	7	$528
	13000 - 13999	57	$34,415	4	$604
	14000 - 14999	46	$27,300	3	$593
	15000 - 15999	44	$23,641	3	$537
	16000 - 16999	61	$31,829	4	$522
	17000 - 17999	48	$27,606	3	$575
	18000 - 18999	58	$32,892	4	$567
	19000 - 19999	64	$40,650	4	$635
	> 19999	746	$435,773	50	$584
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,478	$864,171		$585
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,478	$864,171		$585
RECOUPMENTS		0	$0		$0
NET PAID			$864,171		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 07

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,058	$596,490	53	$564
	Renter	799	$428,703	40	$537
	RenterWithHeat	3	$1,461	0	$487
	SubsidizedWithHeat	6	$1,740	0	$290
	SubsidizedNoHeat	91	$39,916	5	$439
	Roomer	0	$0	0	$0
	Other	42	$23,361	2	$556
RACE	AmericanIndian	4	$2,867	0	$717
	Other	6	$2,961	0	$494
	NativeHawaiian	2	$1,000	0	$500
	Black	49	$27,275	2	$557
	White	1,907	$1,041,281	95	$546
	Asian	6	$3,226	0	$538
	Unknown	25	$13,059	1	$522
DISABLED	YES	640	$335,305	32	$524
	NO	1,359	$756,365	68	$557
AGE 60 & ABV	YES	1,003	$535,845	50	$534
	NO	996	$555,825	50	$558
AGE 5 & BLW	YES	264	$148,391	13	$562
	NO	1,735	$943,279	87	$544
PAY_TYPE	DIRECT	1	$800	0	$800
	PROVIDER	1,998	$1,090,870	100	$546
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.4

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	246	$130,210	12	$529
	FuelOil	1,250	$710,077	63	$568
	Coal	6	$6,000	0	$1,000
	NaturalGas	141	$69,043	7	$490
	Kerosene	96	$58,365	5	$608
	Propane	159	$52,058	8	$327
	WoodOrOther	15	$14,385	1	$959
	BlendedFuel	86	$51,533	4	$599
INCOME RANGE	0 - 999	72	$46,992	4	$653
	1000 - 1999	3	$1,064	0	$355
	2000 - 2999	5	$3,422	0	$684
	3000 - 3999	5	$3,548	0	$710
	4000 - 4999	12	$8,510	1	$709
	5000 - 5999	7	$2,881	0	$412
	6000 - 6999	10	$6,872	1	$687
	7000 - 7999	11	$6,187	1	$562
	8000 - 8999	12	$6,193	1	$516
	9000 - 9999	17	$9,390	1	$552
	10000 - 10999	21	$11,210	1	$534
	11000 - 11999	161	$78,962	8	$490
	12000 - 12999	152	$78,887	8	$519
	13000 - 13999	79	$41,111	4	$520
	14000 - 14999	81	$45,025	4	$556
	15000 - 15999	91	$47,611	5	$523
	16000 - 16999	93	$52,440	5	$564
	17000 - 17999	104	$53,221	5	$512
	18000 - 18999	108	$58,737	5	$544
	19000 - 19999	105	$49,895	5	$475
	> 19999	847	$478,296	42	$565
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,999	$1,091,670		$546
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,999	$1,091,670		$546
RECOUPMENTS		0	$0		$0
NET PAID			$1,091,670		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 08

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	438	$259,294	52	$592
	Renter	352	$191,449	42	$544
	RenterWithHeat	1	$164	0	$164
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	13	$7,634	2	$587
	Roomer	0	$0	0	$0
	Other	31	$20,035	4	$646
RACE	AmericanIndian	2	$1,993	0	$996
	Other	6	$4,448	1	$741
	NativeHawaiian	0	$0	0	$0
	Black	6	$3,446	1	$574
	White	815	$466,125	98	$572
	Asian	0	$0	0	$0
	Unknown	6	$2,564	1	$427
DISABLED	YES	256	$143,958	31	$562
	NO	579	$334,618	69	$578
AGE 60 & ABV	YES	448	$249,688	54	$557
	NO	387	$228,889	46	$591
AGE 5 & BLW	YES	130	$79,260	16	$610
	NO	705	$399,316	84	$566
PAY_TYPE	DIRECT	23	$9,717	3	$422
	PROVIDER	813	$469,706	97	$578
REFUNDS		1	$281		$281

AVERAGE HOUSEHOLD SIZE: 4.14

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	77	$43,799	9	$569
	FuelOil	443	$278,401	53	$628
	Coal	7	$5,328	1	$761
	NaturalGas	53	$25,514	6	$481
	Kerosene	3	$1,040	0	$347
	Propane	200	$83,440	24	$417
	WoodOrOther	37	$32,219	4	$871
	BlendedFuel	15	$8,835	2	$589
INCOME RANGE	0 - 999	16	$8,169	2	$511
	1000 - 1999	2	$1,717	0	$858
	2000 - 2999	4	$2,563	0	$641
	3000 - 3999	3	$1,371	0	$457
	4000 - 4999	3	$1,930	0	$643
	5000 - 5999	4	$1,616	0	$404
	6000 - 6999	6	$3,148	1	$525
	7000 - 7999	9	$5,425	1	$603
	8000 - 8999	5	$2,784	1	$557
	9000 - 9999	10	$4,260	1	$426
	10000 - 10999	8	$4,121	1	$515
	11000 - 11999	52	$29,730	6	$572
	12000 - 12999	88	$44,808	11	$509
	13000 - 13999	28	$17,645	3	$630
	14000 - 14999	34	$18,153	4	$534
	15000 - 15999	24	$15,612	3	$650
	16000 - 16999	37	$19,690	4	$532
	17000 - 17999	34	$21,040	4	$619
	18000 - 18999	41	$22,510	5	$549
	19000 - 19999	31	$17,785	4	$574
	> 19999	396	$234,499	47	$592
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	835	$478,576		$573
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	1	$846		$846
TOTAL PMT		836	$479,422		$573
RECOUPMENTS		0	$0		$0
NET PAID			$479,422		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 09

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	939	$509,639	58	$543
	Renter	571	$324,088	35	$568
	RenterWithHeat	9	$3,515	1	$391
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	89	$48,039	5	$540
	Roomer	0	$0	0	$0
	Other	20	$11,461	1	$573
RACE	AmericanIndian	2	$1,735	0	$868
	Other	107	$59,302	7	$554
	NativeHawaiian	6	$3,474	0	$579
	Black	124	$75,124	8	$606
	White	1,325	$723,072	81	$546
	Asian	20	$11,109	1	$555
	Unknown	44	$22,926	3	$521
DISABLED	YES	386	$214,718	24	$556
	NO	1,242	$682,023	76	$549
AGE 60 & ABV	YES	848	$444,723	52	$524
	NO	780	$452,019	48	$580
AGE 5 & BLW	YES	232	$135,541	14	$584
	NO	1,396	$761,200	86	$545
PAY_TYPE	DIRECT	3	$1,132	0	$377
	PROVIDER	1,625	$895,609	100	$551
REFUNDS		2	$575		$288

AVERAGE HOUSEHOLD SIZE: 3.28

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	231	$150,121	14	$650
	FuelOil	1,169	$649,760	72	$556
	Coal	0	$0	0	$0
	NaturalGas	48	$27,699	3	$577
	Kerosene	2	$969	0	$484
	Propane	178	$68,192	11	$383
	WoodOrOther	0	$0	0	$0
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	44	$30,185	3	$686
	1000 - 1999	6	$5,105	0	$851
	2000 - 2999	6	$4,451	0	$742
	3000 - 3999	6	$3,334	0	$556
	4000 - 4999	4	$2,310	0	$578
	5000 - 5999	6	$3,696	0	$616
	6000 - 6999	13	$5,584	1	$430
	7000 - 7999	21	$10,090	1	$480
	8000 - 8999	15	$8,983	1	$599
	9000 - 9999	22	$12,038	1	$547
	10000 - 10999	36	$16,692	2	$464
	11000 - 11999	68	$37,637	4	$553
	12000 - 12999	97	$49,340	6	$509
	13000 - 13999	52	$27,940	3	$537
	14000 - 14999	47	$24,065	3	$512
	15000 - 15999	69	$35,878	4	$520
	16000 - 16999	71	$37,784	4	$532
	17000 - 17999	60	$33,696	4	$562
	18000 - 18999	84	$44,349	5	$528
	19000 - 19999	95	$43,064	6	$453
	> 19999	806	$460,521	50	$571
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,628	$896,741		$551
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,628	$896,741		$551
RECOUPMENTS		0	$0		$0
NET PAID			$896,741		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 10

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	472	$277,600	50	$588
	Renter	374	$197,747	39	$529
	RenterWithHeat	2	$1,398	0	$699
	SubsidizedWithHeat	3	$1,082	0	$361
	SubsidizedNoHeat	75	$30,786	8	$410
	Roomer	0	$0	0	$0
	Other	23	$13,449	2	$585
RACE	AmericanIndian	4	$1,844	0	$461
	Other	11	$7,388	1	$672
	NativeHawaiian	0	$0	0	$0
	Black	20	$9,907	2	$495
	White	906	$499,466	95	$551
	Asian	0	$0	0	$0
	Unknown	8	$3,458	1	$432
DISABLED	YES	311	$157,674	33	$507
	NO	638	$364,389	67	$571
AGE 60 & ABV	YES	419	$234,424	44	$559
	NO	530	$287,639	56	$543
AGE 5 & BLW	YES	113	$66,713	12	$590
	NO	836	$455,349	88	$545
PAY_TYPE	DIRECT	10	$3,886	1	$389
	PROVIDER	940	$518,389	99	$551
REFUNDS		2	$890		$445

AVERAGE HOUSEHOLD SIZE: 3.24

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	238	$114,295	25	$480
	FuelOil	275	$185,449	29	$674
	Coal	0	$0	0	$0
	NaturalGas	80	$40,262	8	$503
	Kerosene	24	$16,524	3	$688
	Propane	300	$141,893	32	$473
	WoodOrOther	19	$15,136	2	$797
	BlendedFuel	13	$8,502	1	$654
INCOME RANGE	0 - 999	30	$16,435	3	$548
	1000 - 1999	9	$4,314	1	$479
	2000 - 2999	5	$1,877	1	$375
	3000 - 3999	5	$2,910	1	$582
	4000 - 4999	4	$2,325	0	$581
	5000 - 5999	3	$1,139	0	$380
	6000 - 6999	11	$5,839	1	$531
	7000 - 7999	5	$2,291	1	$458
	8000 - 8999	11	$8,180	1	$744
	9000 - 9999	12	$6,283	1	$524
	10000 - 10999	21	$10,783	2	$513
	11000 - 11999	76	$39,939	8	$526
	12000 - 12999	81	$40,139	9	$496
	13000 - 13999	35	$18,740	4	$535
	14000 - 14999	40	$24,023	4	$601
	15000 - 15999	33	$18,941	3	$574
	16000 - 16999	37	$21,012	4	$568
	17000 - 17999	52	$27,976	5	$538
	18000 - 18999	54	$27,177	6	$503
	19000 - 19999	30	$16,793	3	$560
	> 19999	395	$224,945	42	$569
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	949	$522,062		$550
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	1	$212		$212
TOTAL PMT		950	$522,274		$550
RECOUPMENTS		0	$0		$0
NET PAID			$522,274		

Energy Assistance Summary (EASUM)

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County 11

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,934	$1,266,111	63	$655
	Renter	1,026	$625,462	33	$610
	RenterWithHeat	1	$262	0	$262
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	44	$24,482	1	$556
	Roomer	0	$0	0	$0
	Other	73	$44,068	2	$604
RACE	AmericanIndian	2	$1,795	0	$898
	Other	34	$24,910	1	$733
	NativeHawaiian	1	$345	0	$345
	Black	85	$50,538	3	$595
	White	2,914	$1,853,203	95	$636
	Asian	8	$4,538	0	$567
	Unknown	34	$25,057	1	$737
DISABLED	YES	854	$521,719	28	$611
	NO	2,224	$1,438,667	72	$647
AGE 60 & ABV	YES	1,565	$966,819	51	$618
	NO	1,513	$993,567	49	$657
AGE 5 & BLW	YES	406	$272,887	13	$672
	NO	2,672	$1,687,499	87	$632
PAY_TYPE	DIRECT	7	$1,000	0	$143
	PROVIDER	3,072	$1,959,404	100	$638
REFUNDS		1	$30		$30

AVERAGE HOUSEHOLD SIZE: 3.08

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	165	$92,254	5	$559
	FuelOil	2,441	$1,582,181	79	$648
	Coal	114	$98,215	4	$862
	NaturalGas	105	$57,214	3	$545
	Kerosene	31	$13,325	1	$430
	Propane	146	$61,370	5	$420
	WoodOrOther	44	$37,538	1	$853
	BlendedFuel	32	$18,290	1	$572
INCOME RANGE	0 - 999	111	$76,147	4	$686
	1000 - 1999	9	$6,574	0	$730
	2000 - 2999	9	$6,185	0	$687
	3000 - 3999	11	$8,111	0	$737
	4000 - 4999	19	$10,896	1	$573
	5000 - 5999	15	$9,195	0	$613
	6000 - 6999	15	$11,366	0	$758
	7000 - 7999	25	$16,522	1	$661
	8000 - 8999	21	$11,261	1	$536
	9000 - 9999	50	$30,704	2	$614
	10000 - 10999	54	$36,728	2	$680
	11000 - 11999	260	$154,425	8	$594
	12000 - 12999	239	$133,010	8	$557
	13000 - 13999	106	$70,205	3	$662
	14000 - 14999	114	$68,671	4	$602
	15000 - 15999	140	$80,185	5	$573
	16000 - 16999	114	$74,525	4	$654
	17000 - 17999	128	$85,957	4	$672
	18000 - 18999	160	$100,080	5	$626
	19000 - 19999	137	$89,012	4	$650
	> 19999	1,339	$879,627	44	$657
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	3,078	$1,960,386		$637
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	1	$18		$18
TOTAL PMT		3,079	$1,960,404		$637
RECOUPMENTS		0	$0		$0
NET PAID			$1,960,404		

Energy Assistance Summary (EASUM)

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County 12

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	49	$26,896	75	$549
	Renter	14	$6,817	22	$487
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	0	$0	0	$0
	Roomer	0	$0	0	$0
	Other	2	$1,682	3	$841
RACE	AmericanIndian	0	$0	0	$0
	Other	2	$922	3	$461
	NativeHawaiian	0	$0	0	$0
	Black	1	$1,000	2	$1,000
	White	61	$32,472	94	$532
	Asian	1	$1,000	2	$1,000
	Unknown	0	$0	0	$0
DISABLED	YES	21	$9,881	32	$471
	NO	44	$25,513	68	$580
AGE 60 & ABV	YES	33	$18,473	51	$560
	NO	32	$16,921	49	$529
AGE 5 & BLW	YES	5	$2,685	8	$537
	NO	60	$32,708	92	$545
PAY_TYPE	DIRECT	0	$0	0	$0
	PROVIDER	65	$35,394	100	$545
REFUNDS		1	$62		$62

AVERAGE HOUSEHOLD SIZE: 2.96

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	6	$2,422	9	$404
	FuelOil	21	$13,125	32	$625
	Coal	1	$1,000	2	$1,000
	NaturalGas	0	$0	0	$0
	Kerosene	2	$1,697	3	$848
	Propane	31	$13,151	48	$424
	WoodOrOther	4	$3,999	6	$1,000
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	0	$0	0	$0
	1000 - 1999	1	$585	2	$585
	2000 - 2999	1	$686	2	$686
	3000 - 3999	0	$0	0	$0
	4000 - 4999	0	$0	0	$0
	5000 - 5999	0	$0	0	$0
	6000 - 6999	0	$0	0	$0
	7000 - 7999	0	$0	0	$0
	8000 - 8999	1	$733	2	$733
	9000 - 9999	0	$0	0	$0
	10000 - 10999	1	$378	2	$378
	11000 - 11999	5	$2,906	8	$581
	12000 - 12999	2	$811	3	$406
	13000 - 13999	1	$291	2	$291
	14000 - 14999	1	$719	2	$719
	15000 - 15999	3	$2,000	5	$667
	16000 - 16999	0	$0	0	$0
	17000 - 17999	1	$627	2	$627
	18000 - 18999	2	$1,000	3	$500
	19000 - 19999	6	$4,289	9	$715
	> 19999	40	$20,368	62	$509
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	65	$35,394		$545
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		65	$35,394		$545
RECOUPMENTS		0	$0		$0
NET PAID			$35,394		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	781	$437,893	52	$561
	Renter	592	$341,498	39	$577
	RenterWithHeat	1	$1,000	0	$1,000
	SubsidizedWithHeat	1	$112	0	$112
	SubsidizedNoHeat	114	$67,391	8	$591
	Roomer	0	$0	0	$0
	Other	15	$8,571	1	$571
RACE	AmericanIndian	6	$3,110	0	$518
	Other	79	$41,915	5	$531
	NativeHawaiian	2	$1,268	0	$634
	Black	64	$38,980	4	$609
	White	1,324	$756,043	88	$571
	Asian	3	$1,943	0	$648
	Unknown	26	$13,204	2	$508
DISABLED	YES	443	$246,400	29	$556
	NO	1,061	$610,064	71	$575
AGE 60 & ABV	YES	722	$393,579	48	$545
	NO	782	$462,885	52	$592
AGE 5 & BLW	YES	297	$169,796	20	$572
	NO	1,207	$686,668	80	$569
PAY_TYPE	DIRECT	2	$1,369	0	$684
	PROVIDER	1,502	$855,095	100	$569
REFUNDS		1	$38		$38

AVERAGE HOUSEHOLD SIZE: 3.27

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	110	$67,791	7	$616
	FuelOil	1,142	$657,415	76	$576
	Coal	55	$44,229	4	$804
	NaturalGas	4	$1,980	0	$495
	Kerosene	46	$25,546	3	$555
	Propane	140	$54,866	9	$392
	WoodOrOther	4	$3,369	0	$842
	BlendedFuel	3	$1,268	0	$423
INCOME RANGE	0 - 999	37	$25,694	2	$694
	1000 - 1999	8	$4,809	1	$601
	2000 - 2999	6	$4,128	0	$688
	3000 - 3999	7	$3,940	0	$563
	4000 - 4999	9	$4,806	1	$534
	5000 - 5999	13	$9,080	1	$698
	6000 - 6999	8	$5,334	1	$667
	7000 - 7999	7	$4,115	0	$588
	8000 - 8999	12	$7,353	1	$613
	9000 - 9999	21	$13,296	1	$633
	10000 - 10999	16	$9,164	1	$573
	11000 - 11999	68	$41,878	5	$616
	12000 - 12999	95	$52,638	6	$554
	13000 - 13999	53	$28,440	4	$537
	14000 - 14999	72	$40,993	5	$569
	15000 - 15999	55	$33,223	4	$604
	16000 - 16999	64	$33,801	4	$528
	17000 - 17999	60	$31,254	4	$521
	18000 - 18999	77	$40,035	5	$520
	19000 - 19999	84	$43,999	6	$524
	> 19999	730	$417,465	49	$572
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,504	$856,464		$569
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,504	$856,464		$569
RECOUPMENTS		0	$0		$0
NET PAID			$856,464		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	549	$279,874	59	$510
	Renter	336	$181,355	36	$540
	RenterWithHeat	1	$567	0	$567
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	27	$12,378	3	$458
	Roomer	0	$0	0	$0
	Other	25	$12,099	3	$484
RACE	AmericanIndian	0	$0	0	$0
	Other	11	$5,361	1	$487
	NativeHawaiian	0	$0	0	$0
	Black	20	$10,825	2	$541
	White	900	$467,088	96	$519
	Asian	4	$2,000	0	$500
	Unknown	3	$1,000	0	$333
DISABLED	YES	261	$123,716	28	$474
	NO	677	$362,557	72	$536
AGE 60 & ABV	YES	506	$255,676	54	$505
	NO	432	$230,597	46	$534
AGE 5 & BLW	YES	101	$56,122	11	$556
	NO	837	$430,152	89	$514
PAY_TYPE	DIRECT	0	$0	0	$0
	PROVIDER	939	$486,636	100	$518
REFUNDS		2	$37		$18

AVERAGE HOUSEHOLD SIZE: 3.05

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	58	$34,967	6	$603
	FuelOil	752	$384,946	80	$512
	Coal	13	$9,976	1	$767
	NaturalGas	7	$3,394	1	$485
	Kerosene	8	$5,155	1	$644
	Propane	83	$31,448	9	$379
	WoodOrOther	17	$16,388	2	$964
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	17	$11,449	2	$673
	1000 - 1999	2	$1,613	0	$806
	2000 - 2999	5	$1,597	1	$319
	3000 - 3999	3	$1,836	0	$612
	4000 - 4999	5	$2,339	1	$468
	5000 - 5999	3	$2,240	0	$747
	6000 - 6999	3	$1,365	0	$455
	7000 - 7999	7	$5,065	1	$724
	8000 - 8999	8	$5,074	1	$634
	9000 - 9999	7	$2,719	1	$388
	10000 - 10999	17	$9,448	2	$556
	11000 - 11999	67	$30,886	7	$461
	12000 - 12999	79	$42,479	8	$538
	13000 - 13999	33	$19,089	4	$578
	14000 - 14999	38	$19,512	4	$513
	15000 - 15999	39	$18,472	4	$474
	16000 - 16999	51	$25,150	5	$493
	17000 - 17999	49	$26,111	5	$533
	18000 - 18999	50	$24,153	5	$483
	19000 - 19999	67	$33,001	7	$493
	> 19999	388	$202,677	41	$522
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	938	$486,273		$518
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	1	$363		$363
TOTAL PMT		939	$486,636		$518
RECOUPMENTS		0	$0		$0
NET PAID			$486,636		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	355	$186,955	39	$527
	Renter	429	$246,781	47	$575
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	100	$62,572	11	$626
	Roomer	0	$0	0	$0
	Other	20	$11,161	2	$558
RACE	AmericanIndian	8	$4,704	1	$588
	Other	62	$32,222	7	$520
	NativeHawaiian	0	$0	0	$0
	Black	209	$130,238	23	$623
	White	586	$317,188	65	$541
	Asian	8	$5,153	1	$644
	Unknown	31	$17,964	3	$579
DISABLED	YES	214	$111,056	24	$519
	NO	690	$396,413	76	$575
AGE 60 & ABV	YES	417	$215,936	46	$518
	NO	487	$291,533	54	$599
AGE 5 & BLW	YES	142	$91,466	16	$644
	NO	762	$416,003	84	$546
PAY_TYPE	DIRECT	6	$2,062	1	$344
	PROVIDER	898	$505,407	99	$563
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.49

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	138	$90,922	15	$659
	FuelOil	542	$318,490	60	$588
	Coal	0	$0	0	$0
	NaturalGas	34	$24,163	4	$711
	Kerosene	8	$4,417	1	$552
	Propane	182	$69,477	20	$382
	WoodOrOther	0	$0	0	$0
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	39	$25,615	4	$657
	1000 - 1999	3	$2,166	0	$722
	2000 - 2999	9	$5,477	1	$609
	3000 - 3999	7	$4,213	1	$602
	4000 - 4999	7	$5,443	1	$778
	5000 - 5999	6	$3,992	1	$665
	6000 - 6999	6	$4,680	1	$780
	7000 - 7999	7	$4,602	1	$657
	8000 - 8999	12	$6,009	1	$501
	9000 - 9999	17	$9,843	2	$579
	10000 - 10999	25	$12,440	3	$498
	11000 - 11999	58	$29,611	6	$511
	12000 - 12999	51	$27,265	6	$535
	13000 - 13999	22	$11,903	2	$541
	14000 - 14999	23	$12,427	3	$540
	15000 - 15999	29	$15,617	3	$539
	16000 - 16999	36	$17,467	4	$485
	17000 - 17999	40	$17,942	4	$449
	18000 - 18999	37	$20,243	4	$547
	19000 - 19999	43	$27,142	5	$631
	> 19999	426	$242,370	47	$569
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	904	$507,469		$561
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		904	$507,469		$561
RECOUPMENTS		0	$0		$0
NET PAID			$507,469		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	126	$69,466	49	$551
	Renter	96	$50,806	38	$529
	RenterWithHeat	3	$826	1	$275
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	20	$12,521	8	$626
	Roomer	0	$0	0	$0
	Other	10	$7,763	4	$776
RACE	AmericanIndian	1	$319	0	$319
	Other	3	$2,526	1	$842
	NativeHawaiian	0	$0	0	$0
	Black	6	$2,734	2	$456
	White	240	$131,803	94	$549
	Asian	0	$0	0	$0
	Unknown	5	$4,000	2	$800
DISABLED	YES	85	$45,175	33	$531
	NO	170	$96,207	67	$566
AGE 60 & ABV	YES	117	$65,288	46	$558
	NO	138	$76,094	54	$551
AGE 5 & BLW	YES	30	$18,756	12	$625
	NO	225	$122,626	88	$545
PAY_TYPE	DIRECT	4	$2,854	2	$714
	PROVIDER	251	$138,528	98	$552
REFUNDS		1	$294		$294

AVERAGE HOUSEHOLD SIZE: 3.34

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	93	$48,588	36	$522
	FuelOil	54	$36,578	21	$677
	Coal	0	$0	0	$0
	NaturalGas	37	$16,036	15	$433
	Kerosene	6	$1,764	2	$294
	Propane	47	$30,089	18	$640
	WoodOrOther	18	$8,326	7	$463
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	13	$6,658	5	$512
	1000 - 1999	0	$0	0	$0
	2000 - 2999	1	$903	0	$903
	3000 - 3999	1	$694	0	$694
	4000 - 4999	1	$163	0	$163
	5000 - 5999	1	$1,000	0	$1,000
	6000 - 6999	3	$2,027	1	$676
	7000 - 7999	4	$2,940	2	$735
	8000 - 8999	3	$2,000	1	$667
	9000 - 9999	0	$0	0	$0
	10000 - 10999	6	$2,682	2	$447
	11000 - 11999	21	$11,658	8	$555
	12000 - 12999	24	$13,449	9	$560
	13000 - 13999	14	$6,968	5	$498
	14000 - 14999	7	$5,262	3	$752
	15000 - 15999	6	$4,614	2	$769
	16000 - 16999	27	$11,143	11	$413
	17000 - 17999	3	$2,508	1	$836
	18000 - 18999	6	$2,598	2	$433
	19000 - 19999	8	$5,159	3	$645
	> 19999	106	$58,956	42	$556
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	255	$141,382		$554
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		255	$141,382		$554
RECOUPMENTS		0	$0		$0
NET PAID			$141,382		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	2,244	$1,164,743	65	$519
	Renter	1,053	$527,599	31	$501
	RenterWithHeat	3	$1,062	0	$354
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	47	$18,799	1	$400
	Roomer	0	$0	0	$0
	Other	104	$55,533	3	$534
RACE	AmericanIndian	2	$1,910	0	$955
	Other	33	$17,929	1	$543
	NativeHawaiian	4	$2,757	0	$689
	Black	22	$9,707	1	$441
	White	3,369	$1,725,124	98	$512
	Asian	0	$0	0	$0
	Unknown	21	$10,309	1	$491
DISABLED	YES	987	$491,951	29	$498
	NO	2,464	$1,275,786	71	$518
AGE 60 & ABV	YES	1,856	$926,595	54	$499
	NO	1,595	$841,142	46	$527
AGE 5 & BLW	YES	352	$194,334	10	$552
	NO	3,099	$1,573,403	90	$508
PAY_TYPE	DIRECT	6	$2,958	0	$493
	PROVIDER	3,450	$1,766,113	100	$512
REFUNDS		20	$2,633		$132

AVERAGE HOUSEHOLD SIZE: 3.08

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	165	$83,556	5	$506
	FuelOil	2,683	$1,401,526	78	$522
	Coal	69	$55,023	2	$797
	NaturalGas	27	$9,995	1	$370
	Kerosene	13	$9,560	0	$735
	Propane	387	$144,097	11	$372
	WoodOrOther	83	$50,043	2	$603
	BlendedFuel	24	$13,936	1	$581
INCOME RANGE	0 - 999	125	$73,201	4	$586
	1000 - 1999	15	$7,249	0	$483
	2000 - 2999	11	$6,110	0	$555
	3000 - 3999	14	$8,288	0	$592
	4000 - 4999	17	$9,998	0	$588
	5000 - 5999	13	$7,183	0	$553
	6000 - 6999	19	$10,183	1	$536
	7000 - 7999	16	$8,164	0	$510
	8000 - 8999	29	$16,446	1	$567
	9000 - 9999	46	$24,300	1	$528
	10000 - 10999	54	$28,867	2	$535
	11000 - 11999	208	$100,190	6	$482
	12000 - 12999	230	$112,167	7	$488
	13000 - 13999	135	$64,611	4	$479
	14000 - 14999	135	$65,306	4	$484
	15000 - 15999	116	$57,773	3	$498
	16000 - 16999	188	$92,323	5	$491
	17000 - 17999	177	$83,743	5	$473
	18000 - 18999	192	$101,522	6	$529
	19000 - 19999	161	$81,297	5	$505
	> 19999	1,548	$807,017	45	$521
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	3,451	$1,767,737		$512
	Reissue	2	$1,243		$622
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	3	$91		$30
TOTAL PMT		3,456	$1,769,071		$512
RECOUPMENTS		0	$0		$0
NET PAID			$1,769,071		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	560	$279,000	58	$498
	Renter	370	$185,582	38	$502
	RenterWithHeat	1	$552	0	$552
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	7	$4,590	1	$656
	Roomer	0	$0	0	$0
	Other	24	$10,553	2	$440
RACE	AmericanIndian	1	$222	0	$222
	Other	4	$3,738	0	$934
	NativeHawaiian	0	$0	0	$0
	Black	4	$2,676	0	$669
	White	943	$469,068	98	$497
	Asian	2	$957	0	$478
	Unknown	8	$3,617	1	$452
DISABLED	YES	233	$119,908	24	$515
	NO	729	$360,369	76	$494
AGE 60 & ABV	YES	543	$255,505	56	$471
	NO	419	$224,772	44	$536
AGE 5 & BLW	YES	123	$68,478	13	$557
	NO	839	$411,799	87	$491
PAY_TYPE	DIRECT	0	$0	0	$0
	PROVIDER	962	$480,277	100	$499
REFUNDS		1	$21		$21

AVERAGE HOUSEHOLD SIZE: 3.04

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	42	$25,064	4	$597
	FuelOil	749	$376,108	78	$502
	Coal	19	$12,828	2	$675
	NaturalGas	9	$7,425	1	$825
	Kerosene	0	$0	0	$0
	Propane	132	$48,968	14	$371
	WoodOrOther	10	$9,190	1	$919
	BlendedFuel	1	$694	0	$694
INCOME RANGE	0 - 999	18	$11,971	2	$665
	1000 - 1999	2	$835	0	$418
	2000 - 2999	2	$1,618	0	$809
	3000 - 3999	4	$2,792	0	$698
	4000 - 4999	5	$2,163	1	$433
	5000 - 5999	2	$1,676	0	$838
	6000 - 6999	9	$5,359	1	$595
	7000 - 7999	4	$2,000	0	$500
	8000 - 8999	8	$2,863	1	$358
	9000 - 9999	9	$4,767	1	$530
	10000 - 10999	7	$4,643	1	$663
	11000 - 11999	58	$26,751	6	$461
	12000 - 12999	81	$39,839	8	$492
	13000 - 13999	31	$14,503	3	$468
	14000 - 14999	36	$14,487	4	$402
	15000 - 15999	46	$21,709	5	$472
	16000 - 16999	42	$19,207	4	$457
	17000 - 17999	44	$18,902	5	$430
	18000 - 18999	51	$27,209	5	$534
	19000 - 19999	40	$19,938	4	$498
	> 19999	462	$236,393	48	$512
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	962	$480,277		$499
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		962	$480,277		$499
RECOUPMENTS		0	$0		$0
NET PAID			$480,277		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	598	$307,078	54	$514
	Renter	482	$240,324	44	$499
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	12	$5,464	1	$455
	Roomer	0	$0	0	$0
	Other	13	$8,161	1	$628
RACE	AmericanIndian	2	$1,049	0	$524
	Other	30	$14,597	3	$487
	NativeHawaiian	1	$584	0	$584
	Black	31	$15,120	3	$488
	White	1,028	$521,796	93	$508
	Asian	1	$467	0	$467
	Unknown	12	$7,414	1	$618
DISABLED	YES	285	$136,462	26	$479
	NO	820	$424,564	74	$518
AGE 60 & ABV	YES	596	$296,907	54	$498
	NO	509	$264,119	46	$519
AGE 5 & BLW	YES	148	$76,066	13	$514
	NO	957	$484,960	87	$507
PAY_TYPE	DIRECT	0	$0	0	$0
	PROVIDER	1,105	$561,026	100	$508
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.09

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	71	$40,583	6	$572
	FuelOil	706	$378,620	64	$536
	Coal	13	$12,769	1	$982
	NaturalGas	11	$9,071	1	$825
	Kerosene	5	$2,990	0	$598
	Propane	253	$90,041	23	$356
	WoodOrOther	8	$5,615	1	$702
	BlendedFuel	38	$21,337	3	$562
INCOME RANGE	0 - 999	21	$10,297	2	$490
	1000 - 1999	4	$1,678	0	$420
	2000 - 2999	3	$1,758	0	$586
	3000 - 3999	0	$0	0	$0
	4000 - 4999	8	$2,862	1	$358
	5000 - 5999	5	$4,827	0	$965
	6000 - 6999	7	$3,707	1	$530
	7000 - 7999	11	$6,440	1	$585
	8000 - 8999	13	$5,705	1	$439
	9000 - 9999	11	$5,182	1	$471
	10000 - 10999	24	$11,260	2	$469
	11000 - 11999	53	$26,418	5	$498
	12000 - 12999	71	$36,515	6	$514
	13000 - 13999	56	$24,797	5	$443
	14000 - 14999	46	$24,029	4	$522
	15000 - 15999	39	$20,375	4	$522
	16000 - 16999	61	$32,019	6	$525
	17000 - 17999	75	$35,752	7	$477
	18000 - 18999	66	$33,685	6	$510
	19000 - 19999	60	$29,631	5	$494
	> 19999	470	$243,499	43	$518
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,105	$561,026		$508
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,105	$561,026		$508
RECOUPMENTS		0	$0		$0
NET PAID			$561,026		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	700	$364,239	57	$520
	Renter	472	$229,233	38	$486
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	8	$2,821	1	$353
	SubsidizedNoHeat	16	$6,392	1	$400
	Roomer	0	$0	0	$0
	Other	31	$16,168	3	$522
RACE	AmericanIndian	6	$3,144	0	$524
	Other	5	$1,694	0	$339
	NativeHawaiian	0	$0	0	$0
	Black	27	$13,248	2	$491
	White	1,163	$589,631	95	$507
	Asian	4	$1,212	0	$303
	Unknown	22	$9,923	2	$451
DISABLED	YES	429	$215,305	35	$502
	NO	798	$403,548	65	$506
AGE 60 & ABV	YES	628	$315,047	51	$502
	NO	599	$303,805	49	$507
AGE 5 & BLW	YES	153	$80,066	12	$523
	NO	1,074	$538,786	88	$502
PAY_TYPE	DIRECT	18	$7,296	1	$405
	PROVIDER	1,212	$612,625	99	$505
REFUNDS		7	$2,011		$287

AVERAGE HOUSEHOLD SIZE: 3.38

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	295	$125,767	24	$426
	FuelOil	244	$140,139	20	$574
	Coal	15	$9,880	1	$659
	NaturalGas	75	$28,013	6	$374
	Kerosene	6	$3,605	0	$601
	Propane	506	$251,944	41	$498
	WoodOrOther	50	$38,089	4	$762
	BlendedFuel	36	$21,415	3	$595
INCOME RANGE	0 - 999	35	$20,019	3	$572
	1000 - 1999	1	$228	0	$228
	2000 - 2999	4	$1,391	0	$348
	3000 - 3999	11	$5,021	1	$456
	4000 - 4999	6	$3,585	0	$598
	5000 - 5999	6	$4,312	0	$719
	6000 - 6999	2	$992	0	$496
	7000 - 7999	14	$6,696	1	$478
	8000 - 8999	6	$3,148	0	$525
	9000 - 9999	10	$6,220	1	$622
	10000 - 10999	20	$12,036	2	$602
	11000 - 11999	100	$48,372	8	$484
	12000 - 12999	108	$53,862	9	$499
	13000 - 13999	44	$19,885	4	$452
	14000 - 14999	47	$21,938	4	$467
	15000 - 15999	53	$27,871	4	$526
	16000 - 16999	40	$20,998	3	$525
	17000 - 17999	64	$28,615	5	$447
	18000 - 18999	54	$24,021	4	$445
	19000 - 19999	58	$25,864	5	$446
	> 19999	544	$283,777	44	$522
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,227	$618,852		$504
	Reissue	2	$1,004		$502
	Secondpay	1	$65		$65
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,230	$619,921		$504
RECOUPMENTS		0	$0		$0
NET PAID			$619,921		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	431	$219,062	44	$508
	Renter	493	$266,026	51	$540
	RenterWithHeat	1	$411	0	$411
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	23	$9,641	2	$419
	Roomer	0	$0	0	$0
	Other	22	$11,963	2	$544
RACE	AmericanIndian	3	$1,391	0	$464
	Other	69	$37,711	7	$547
	NativeHawaiian	0	$0	0	$0
	Black	63	$36,734	6	$583
	White	793	$408,719	82	$515
	Asian	8	$5,917	1	$740
	Unknown	34	$16,632	4	$489
DISABLED	YES	241	$121,685	25	$505
	NO	729	$385,419	75	$529
AGE 60 & ABV	YES	415	$205,649	43	$496
	NO	555	$301,455	57	$543
AGE 5 & BLW	YES	193	$108,561	20	$562
	NO	777	$398,544	80	$513
PAY_TYPE	DIRECT	1	$1,000	0	$1,000
	PROVIDER	969	$506,104	100	$522
REFUNDS		1	$136		$136

AVERAGE HOUSEHOLD SIZE: 3.21

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	174	$107,754	18	$619
	FuelOil	522	$269,496	54	$516
	Coal	2	$1,998	0	$999
	NaturalGas	15	$10,270	2	$685
	Kerosene	28	$17,287	3	$617
	Propane	223	$96,201	23	$431
	WoodOrOther	6	$4,099	1	$683
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	24	$14,276	2	$595
	1000 - 1999	3	$558	0	$186
	2000 - 2999	0	$0	0	$0
	3000 - 3999	3	$2,129	0	$710
	4000 - 4999	5	$2,892	1	$578
	5000 - 5999	8	$3,285	1	$411
	6000 - 6999	7	$3,542	1	$506
	7000 - 7999	7	$3,172	1	$453
	8000 - 8999	13	$6,227	1	$479
	9000 - 9999	11	$5,134	1	$467
	10000 - 10999	10	$7,771	1	$777
	11000 - 11999	43	$20,510	4	$477
	12000 - 12999	62	$34,000	6	$548
	13000 - 13999	41	$20,361	4	$497
	14000 - 14999	42	$19,903	4	$474
	15000 - 15999	47	$21,340	5	$454
	16000 - 16999	32	$15,349	3	$480
	17000 - 17999	45	$23,317	5	$518
	18000 - 18999	62	$31,024	6	$500
	19000 - 19999	47	$23,415	5	$498
	> 19999	458	$248,900	47	$543
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	970	$507,104		$523
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		970	$507,104		$523
RECOUPMENTS		0	$0		$0
NET PAID			$507,104		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	523	$278,942	48	$533
	Renter	507	$265,277	46	$523
	RenterWithHeat	6	$2,616	1	$436
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	58	$32,820	5	$566
	Roomer	1	$1,000	0	$1,000
	Other	6	$3,669	1	$612
RACE	AmericanIndian	10	$4,492	1	$449
	Other	123	$64,460	11	$524
	NativeHawaiian	4	$2,126	0	$532
	Black	237	$127,727	22	$539
	White	690	$364,578	63	$528
	Asian	13	$5,755	1	$443
	Unknown	24	$15,186	2	$633
DISABLED	YES	301	$148,857	27	$495
	NO	800	$435,467	73	$544
AGE 60 & ABV	YES	516	$252,990	47	$490
	NO	585	$331,335	53	$566
AGE 5 & BLW	YES	179	$107,800	16	$602
	NO	922	$476,525	84	$517
PAY_TYPE	DIRECT	3	$1,647	0	$549
	PROVIDER	1,098	$582,677	100	$531
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.31

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	244	$119,955	22	$492
	FuelOil	614	$346,151	56	$564
	Coal	6	$5,490	1	$915
	NaturalGas	29	$24,578	3	$848
	Kerosene	0	$0	0	$0
	Propane	203	$84,273	18	$415
	WoodOrOther	5	$3,878	0	$776
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	22	$14,739	2	$670
	1000 - 1999	5	$2,945	0	$589
	2000 - 2999	4	$2,621	0	$655
	3000 - 3999	3	$1,952	0	$651
	4000 - 4999	3	$2,565	0	$855
	5000 - 5999	4	$2,789	0	$697
	6000 - 6999	8	$4,106	1	$513
	7000 - 7999	3	$1,972	0	$657
	8000 - 8999	9	$4,815	1	$535
	9000 - 9999	23	$15,130	2	$658
	10000 - 10999	15	$7,299	1	$487
	11000 - 11999	58	$29,663	5	$511
	12000 - 12999	80	$40,515	7	$506
	13000 - 13999	49	$24,181	4	$493
	14000 - 14999	49	$20,940	4	$427
	15000 - 15999	67	$32,396	6	$484
	16000 - 16999	46	$22,434	4	$488
	17000 - 17999	43	$22,427	4	$522
	18000 - 18999	40	$18,398	4	$460
	19000 - 19999	68	$34,115	6	$502
	> 19999	500	$277,323	45	$555
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,101	$584,324		$531
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,101	$584,324		$531
RECOUPMENTS		0	$0		$0
NET PAID			$584,324		

Energy Assistance Summary (EASUM)

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County 23

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	482	$297,179	38	$617
	Renter	584	$378,428	46	$648
	RenterWithHeat	5	$3,210	0	$642
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	200	$129,095	16	$645
	Roomer	0	$0	0	$0
	Other	6	$3,091	0	$515
RACE	AmericanIndian	1	$475	0	$475
	Other	66	$43,359	5	$657
	NativeHawaiian	2	$1,176	0	$588
	Black	782	$503,181	61	$643
	White	406	$249,422	32	$614
	Asian	11	$6,228	1	$566
	Unknown	9	$7,162	1	$796
DISABLED	YES	379	$234,180	30	$618
	NO	898	$576,823	70	$642
AGE 60 & ABV	YES	506	$292,251	40	$578
	NO	771	$518,753	60	$673
AGE 5 & BLW	YES	261	$178,441	20	$684
	NO	1,016	$632,562	80	$623
PAY_TYPE	DIRECT	0	$0	0	$0
	PROVIDER	1,277	$811,004	100	$635
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.68

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	161	$105,827	13	$657
	FuelOil	625	$376,308	49	$602
	Coal	0	$0	0	$0
	NaturalGas	484	$326,195	38	$674
	Kerosene	0	$0	0	$0
	Propane	7	$2,675	1	$382
	WoodOrOther	0	$0	0	$0
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	46	$34,098	4	$741
	1000 - 1999	9	$4,760	1	$529
	2000 - 2999	9	$6,233	1	$693
	3000 - 3999	8	$4,660	1	$582
	4000 - 4999	7	$4,368	1	$624
	5000 - 5999	8	$6,744	1	$843
	6000 - 6999	6	$3,094	0	$516
	7000 - 7999	12	$8,510	1	$709
	8000 - 8999	16	$11,722	1	$733
	9000 - 9999	10	$6,209	1	$621
	10000 - 10999	31	$19,540	2	$630
	11000 - 11999	69	$41,355	5	$599
	12000 - 12999	101	$55,238	8	$547
	13000 - 13999	47	$25,217	4	$537
	14000 - 14999	48	$27,911	4	$581
	15000 - 15999	70	$40,671	5	$581
	16000 - 16999	41	$25,869	3	$631
	17000 - 17999	42	$24,722	3	$589
	18000 - 18999	56	$33,290	4	$594
	19000 - 19999	51	$31,087	4	$610
	> 19999	590	$395,704	46	$671
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,277	$811,004		$635
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,277	$811,004		$635
RECOUPMENTS		0	$0		$0
NET PAID			$811,004		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	106	$56,987	66	$538
	Renter	44	$22,951	27	$522
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	1	$660	1	$660
	SubsidizedNoHeat	8	$2,364	5	$296
	Roomer	0	$0	0	$0
	Other	2	$1,128	1	$564
RACE	AmericanIndian	0	$0	0	$0
	Other	1	$991	1	$991
	NativeHawaiian	0	$0	0	$0
	Black	1	$281	1	$281
	White	159	$82,818	99	$521
	Asian	0	$0	0	$0
	Unknown	0	$0	0	$0
DISABLED	YES	38	$17,474	24	$460
	NO	123	$66,615	76	$542
AGE 60 & ABV	YES	97	$54,044	60	$557
	NO	64	$30,046	40	$469
AGE 5 & BLW	YES	11	$6,095	7	$554
	NO	150	$77,994	93	$520
PAY_TYPE	DIRECT	0	$0	0	$0
	PROVIDER	161	$84,089	100	$522
REFUNDS		2	$95		$48

AVERAGE HOUSEHOLD SIZE: 2.76

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	38	$20,098	24	$529
	FuelOil	37	$21,589	23	$583
	Coal	0	$0	0	$0
	NaturalGas	20	$6,270	12	$314
	Kerosene	2	$996	1	$498
	Propane	56	$27,253	35	$487
	WoodOrOther	8	$7,884	5	$986
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	5	$2,897	3	$579
	1000 - 1999	0	$0	0	$0
	2000 - 2999	1	$255	1	$255
	3000 - 3999	1	$660	1	$660
	4000 - 4999	0	$0	0	$0
	5000 - 5999	0	$0	0	$0
	6000 - 6999	3	$1,187	2	$396
	7000 - 7999	2	$1,130	1	$565
	8000 - 8999	0	$0	0	$0
	9000 - 9999	1	$634	1	$634
	10000 - 10999	3	$1,759	2	$586
	11000 - 11999	10	$4,186	6	$419
	12000 - 12999	11	$6,701	7	$609
	13000 - 13999	5	$1,895	3	$379
	14000 - 14999	9	$3,309	6	$368
	15000 - 15999	9	$4,309	6	$479
	16000 - 16999	7	$3,328	4	$475
	17000 - 17999	12	$6,092	7	$508
	18000 - 18999	12	$6,297	7	$525
	19000 - 19999	8	$2,967	5	$371
	> 19999	62	$36,483	39	$588
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	161	$84,089		$522
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		161	$84,089		$522
RECOUPMENTS		0	$0		$0
NET PAID			$84,089		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	453	$223,235	34	$493
	Renter	764	$375,929	57	$492
	RenterWithHeat	6	$2,478	0	$413
	SubsidizedWithHeat	7	$2,536	1	$362
	SubsidizedNoHeat	100	$46,831	7	$468
	Roomer	0	$0	0	$0
	Other	6	$4,530	0	$755
RACE	AmericanIndian	4	$1,649	0	$412
	Other	48	$25,553	4	$532
	NativeHawaiian	0	$0	0	$0
	Black	329	$165,011	25	$502
	White	942	$457,501	71	$486
	Asian	4	$2,170	0	$542
	Unknown	9	$3,655	1	$406
DISABLED	YES	409	$180,794	31	$442
	NO	927	$474,745	69	$512
AGE 60 & ABV	YES	359	$165,620	27	$461
	NO	977	$489,919	73	$501
AGE 5 & BLW	YES	278	$148,858	21	$535
	NO	1,058	$506,681	79	$479
PAY_TYPE	DIRECT	2	$1,233	0	$616
	PROVIDER	1,334	$654,306	100	$490
REFUNDS		15	$2,907		$194

AVERAGE HOUSEHOLD SIZE: 4.01

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	575	$288,761	43	$502
	FuelOil	71	$41,261	5	$581
	Coal	1	$990	0	$990
	NaturalGas	459	$213,759	34	$466
	Kerosene	2	$1,435	0	$718
	Propane	219	$101,685	16	$464
	WoodOrOther	8	$6,668	1	$834
	BlendedFuel	1	$980	0	$980
INCOME RANGE	0 - 999	70	$37,041	5	$529
	1000 - 1999	0	$0	0	$0
	2000 - 2999	4	$2,891	0	$723
	3000 - 3999	8	$3,762	1	$470
	4000 - 4999	9	$5,129	1	$570
	5000 - 5999	1	$330	0	$330
	6000 - 6999	7	$4,316	1	$617
	7000 - 7999	11	$5,753	1	$523
	8000 - 8999	12	$5,215	1	$435
	9000 - 9999	13	$5,051	1	$389
	10000 - 10999	31	$14,923	2	$481
	11000 - 11999	81	$40,901	6	$505
	12000 - 12999	110	$43,752	8	$398
	13000 - 13999	48	$22,742	4	$474
	14000 - 14999	64	$27,837	5	$435
	15000 - 15999	38	$16,662	3	$438
	16000 - 16999	54	$29,354	4	$544
	17000 - 17999	39	$15,784	3	$405
	18000 - 18999	58	$28,919	4	$499
	19000 - 19999	69	$30,822	5	$447
	> 19999	609	$314,354	46	$516
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,336	$655,539		$491
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,336	$655,539		$491
RECOUPMENTS		0	$0		$0
NET PAID			$655,539		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	2,485	$1,509,275	53	$607
	Renter	1,876	$1,073,689	40	$572
	RenterWithHeat	2	$1,209	0	$604
	SubsidizedWithHeat	16	$6,549	0	$409
	SubsidizedNoHeat	158	$80,407	3	$509
	Roomer	0	$0	0	$0
	Other	160	$96,885	3	$606
RACE	AmericanIndian	9	$5,879	0	$653
	Other	20	$13,934	0	$697
	NativeHawaiian	5	$2,784	0	$557
	Black	221	$112,459	5	$509
	White	4,404	$2,607,965	94	$592
	Asian	4	$2,679	0	$670
	Unknown	34	$22,314	1	$656
DISABLED	YES	1,566	$899,623	33	$574
	NO	3,131	$1,868,391	67	$597
AGE 60 & ABV	YES	2,449	$1,405,837	52	$574
	NO	2,248	$1,362,176	48	$606
AGE 5 & BLW	YES	523	$327,731	11	$627
	NO	4,174	$2,440,282	89	$585
PAY_TYPE	DIRECT	8	$2,932	0	$366
	PROVIDER	4,690	$2,765,591	100	$590
REFUNDS		3	$54		$18

AVERAGE HOUSEHOLD SIZE: 3.64

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	480	$264,783	10	$552
	FuelOil	2,970	$1,814,823	63	$611
	Coal	23	$22,000	0	$957
	NaturalGas	290	$125,270	6	$432
	Kerosene	360	$228,095	8	$634
	Propane	496	$245,841	11	$496
	WoodOrOther	70	$62,804	1	$897
	BlendedFuel	8	$4,398	0	$550
INCOME RANGE	0 - 999	199	$136,031	4	$684
	1000 - 1999	15	$10,444	0	$696
	2000 - 2999	25	$15,035	1	$601
	3000 - 3999	26	$16,606	1	$639
	4000 - 4999	33	$20,135	1	$610
	5000 - 5999	23	$12,521	0	$544
	6000 - 6999	27	$15,654	1	$580
	7000 - 7999	40	$23,422	1	$586
	8000 - 8999	37	$20,512	1	$554
	9000 - 9999	52	$34,460	1	$663
	10000 - 10999	103	$61,094	2	$593
	11000 - 11999	525	$291,281	11	$555
	12000 - 12999	466	$273,469	10	$587
	13000 - 13999	162	$89,661	3	$553
	14000 - 14999	181	$100,665	4	$556
	15000 - 15999	170	$94,752	4	$557
	16000 - 16999	180	$106,771	4	$593
	17000 - 17999	192	$109,930	4	$573
	18000 - 18999	200	$116,002	4	$580
	19000 - 19999	172	$104,696	4	$609
	> 19999	1,866	$1,113,529	40	$597
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	4,697	$2,768,014		$589
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	1	$510		$510
TOTAL PMT		4,698	$2,768,524		$589
RECOUPMENTS		0	$0		$0
NET PAID			$2,768,524		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	72	$39,414	77	$547
	Renter	17	$5,624	18	$331
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	3	$1,207	3	$402
	Roomer	0	$0	0	$0
	Other	1	$192	1	$192
RACE	AmericanIndian	0	$0	0	$0
	Other	0	$0	0	$0
	NativeHawaiian	0	$0	0	$0
	Black	0	$0	0	$0
	White	93	$46,437	100	$499
	Asian	0	$0	0	$0
	Unknown	0	$0	0	$0
DISABLED	YES	42	$20,439	45	$487
	NO	51	$25,998	55	$510
AGE 60 & ABV	YES	57	$27,527	61	$483
	NO	36	$18,910	39	$525
AGE 5 & BLW	YES	11	$4,935	12	$449
	NO	82	$41,502	88	$506
PAY_TYPE	DIRECT	0	$0	0	$0
	PROVIDER	93	$46,437	100	$499
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 2.71

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	12	$6,399	13	$533
	FuelOil	16	$10,205	17	$638
	Coal	0	$0	0	$0
	NaturalGas	3	$696	3	$232
	Kerosene	3	$1,990	3	$663
	Propane	51	$23,312	55	$457
	WoodOrOther	7	$2,835	8	$405
	BlendedFuel	1	$1,000	1	$1,000
INCOME RANGE	0 - 999	0	$0	0	$0
	1000 - 1999	0	$0	0	$0
	2000 - 2999	0	$0	0	$0
	3000 - 3999	1	$1,000	1	$1,000
	4000 - 4999	2	$862	2	$431
	5000 - 5999	1	$250	1	$250
	6000 - 6999	3	$1,000	3	$333
	7000 - 7999	0	$0	0	$0
	8000 - 8999	0	$0	0	$0
	9000 - 9999	3	$1,601	3	$534
	10000 - 10999	2	$1,801	2	$900
	11000 - 11999	5	$1,810	5	$362
	12000 - 12999	8	$4,885	9	$611
	13000 - 13999	4	$2,186	4	$546
	14000 - 14999	4	$898	4	$224
	15000 - 15999	2	$1,225	2	$612
	16000 - 16999	1	$163	1	$163
	17000 - 17999	4	$1,633	4	$408
	18000 - 18999	0	$0	0	$0
	19000 - 19999	9	$3,916	10	$435
	> 19999	44	$23,207	47	$527
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	93	$46,437		$499
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		93	$46,437		$499
RECOUPMENTS		0	$0		$0
NET PAID			$46,437		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	443	$221,916	51	$501
	Renter	404	$214,711	46	$531
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	7	$3,595	1	$514
	Roomer	0	$0	0	$0
	Other	22	$11,693	3	$532
RACE	AmericanIndian	1	$640	0	$640
	Other	41	$21,271	5	$519
	NativeHawaiian	0	$0	0	$0
	Black	24	$13,456	3	$561
	White	780	$400,971	89	$514
	Asian	0	$0	0	$0
	Unknown	30	$15,576	3	$519
DISABLED	YES	255	$134,981	29	$529
	NO	621	$316,934	71	$510
AGE 60 & ABV	YES	444	$208,433	51	$469
	NO	432	$243,482	49	$564
AGE 5 & BLW	YES	128	$71,606	15	$559
	NO	748	$380,309	85	$508
PAY_TYPE	DIRECT	5	$2,164	1	$433
	PROVIDER	871	$449,751	99	$516
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.33

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	141	$86,496	16	$613
	FuelOil	534	$265,219	61	$497
	Coal	0	$0	0	$0
	NaturalGas	9	$4,860	1	$540
	Kerosene	51	$32,861	6	$644
	Propane	128	$54,592	15	$426
	WoodOrOther	13	$7,887	1	$607
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	24	$15,818	3	$659
	1000 - 1999	2	$672	0	$336
	2000 - 2999	3	$967	0	$322
	3000 - 3999	2	$778	0	$389
	4000 - 4999	5	$3,064	1	$613
	5000 - 5999	3	$1,992	0	$664
	6000 - 6999	11	$4,950	1	$450
	7000 - 7999	2	$463	0	$232
	8000 - 8999	6	$3,101	1	$517
	9000 - 9999	12	$6,379	1	$532
	10000 - 10999	9	$5,456	1	$606
	11000 - 11999	53	$25,972	6	$490
	12000 - 12999	62	$32,470	7	$524
	13000 - 13999	24	$12,791	3	$533
	14000 - 14999	53	$22,818	6	$431
	15000 - 15999	23	$13,941	3	$606
	16000 - 16999	41	$19,901	5	$485
	17000 - 17999	52	$24,884	6	$479
	18000 - 18999	34	$15,769	4	$464
	19000 - 19999	55	$25,896	6	$471
	> 19999	400	$213,833	46	$535
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	876	$451,915		$516
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		876	$451,915		$516
RECOUPMENTS		0	$0		$0
NET PAID			$451,915		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	201	$99,889	45	$497
	Renter	196	$94,303	44	$481
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	38	$18,251	9	$480
	Roomer	0	$0	0	$0
	Other	11	$7,374	2	$670
RACE	AmericanIndian	2	$998	0	$499
	Other	4	$2,251	1	$563
	NativeHawaiian	0	$0	0	$0
	Black	11	$4,610	2	$419
	White	429	$211,959	96	$494
	Asian	0	$0	0	$0
	Unknown	0	$0	0	$0
DISABLED	YES	134	$63,053	30	$471
	NO	312	$156,765	70	$502
AGE 60 & ABV	YES	267	$128,327	60	$481
	NO	179	$91,492	40	$511
AGE 5 & BLW	YES	46	$25,865	10	$562
	NO	400	$193,953	90	$485
PAY_TYPE	DIRECT	4	$1,635	1	$409
	PROVIDER	442	$218,183	99	$494
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 2.97

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	34	$19,831	8	$583
	FuelOil	322	$155,061	72	$482
	Coal	3	$2,000	1	$667
	NaturalGas	0	$0	0	$0
	Kerosene	12	$8,892	3	$741
	Propane	52	$20,533	12	$395
	WoodOrOther	23	$13,501	5	$587
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	14	$8,274	3	$591
	1000 - 1999	2	$1,263	0	$632
	2000 - 2999	1	$632	0	$632
	3000 - 3999	3	$1,724	1	$575
	4000 - 4999	0	$0	0	$0
	5000 - 5999	3	$848	1	$283
	6000 - 6999	2	$1,242	0	$621
	7000 - 7999	1	$765	0	$765
	8000 - 8999	3	$2,000	1	$667
	9000 - 9999	8	$2,600	2	$325
	10000 - 10999	8	$4,121	2	$515
	11000 - 11999	27	$12,765	6	$473
	12000 - 12999	48	$21,904	11	$456
	13000 - 13999	17	$8,091	4	$476
	14000 - 14999	22	$8,777	5	$399
	15000 - 15999	20	$7,485	4	$374
	16000 - 16999	19	$8,881	4	$467
	17000 - 17999	22	$11,232	5	$511
	18000 - 18999	23	$12,115	5	$527
	19000 - 19999	20	$8,597	4	$430
	> 19999	183	$96,504	41	$527
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	446	$219,818		$493
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		446	$219,818		$493
RECOUPMENTS		0	$0		$0
NET PAID			$219,818		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	368	$212,996	54	$579
	Renter	283	$163,785	41	$579
	RenterWithHeat	1	$177	0	$177
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	14	$6,650	2	$475
	Roomer	0	$0	0	$0
	Other	17	$10,364	2	$610
RACE	AmericanIndian	0	$0	0	$0
	Other	3	$1,190	0	$397
	NativeHawaiian	0	$0	0	$0
	Black	4	$2,843	1	$711
	White	673	$388,226	99	$577
	Asian	0	$0	0	$0
	Unknown	3	$1,713	0	$571
DISABLED	YES	273	$151,471	40	$555
	NO	410	$242,502	60	$591
AGE 60 & ABV	YES	335	$189,277	49	$565
	NO	348	$204,695	51	$588
AGE 5 & BLW	YES	75	$41,598	11	$555
	NO	608	$352,374	89	$580
PAY_TYPE	DIRECT	4	$2,539	1	$635
	PROVIDER	679	$391,433	99	$576
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.41

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	89	$57,352	13	$644
	FuelOil	375	$215,892	55	$576
	Coal	1	$1,000	0	$1,000
	NaturalGas	22	$12,528	3	$569
	Kerosene	41	$29,294	6	$714
	Propane	140	$63,932	20	$457
	WoodOrOther	14	$12,974	2	$927
	BlendedFuel	1	$1,000	0	$1,000
INCOME RANGE	0 - 999	33	$23,169	5	$702
	1000 - 1999	3	$1,597	0	$532
	2000 - 2999	1	$681	0	$681
	3000 - 3999	7	$4,327	1	$618
	4000 - 4999	10	$6,153	1	$615
	5000 - 5999	2	$961	0	$480
	6000 - 6999	11	$6,291	2	$572
	7000 - 7999	3	$3,000	0	$1,000
	8000 - 8999	6	$3,163	1	$527
	9000 - 9999	8	$5,565	1	$696
	10000 - 10999	16	$8,608	2	$538
	11000 - 11999	74	$38,312	11	$518
	12000 - 12999	59	$31,900	9	$541
	13000 - 13999	28	$14,505	4	$518
	14000 - 14999	33	$16,402	5	$497
	15000 - 15999	33	$16,249	5	$492
	16000 - 16999	28	$15,105	4	$539
	17000 - 17999	29	$19,087	4	$658
	18000 - 18999	13	$8,675	2	$667
	19000 - 19999	15	$8,791	2	$586
	> 19999	271	$161,430	40	$596
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	683	$393,972		$577
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		683	$393,972		$577
RECOUPMENTS		0	$0		$0
NET PAID			$393,972		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	912	$479,801	58	$526
	Renter	551	$290,953	35	$528
	RenterWithHeat	1	$148	0	$148
	SubsidizedWithHeat	1	$161	0	$161
	SubsidizedNoHeat	34	$15,755	2	$463
	Roomer	0	$0	0	$0
	Other	76	$40,690	5	$535
RACE	AmericanIndian	0	$0	0	$0
	Other	10	$6,501	1	$650
	NativeHawaiian	1	$561	0	$561
	Black	47	$24,633	3	$524
	White	1,504	$789,286	95	$525
	Asian	0	$0	0	$0
	Unknown	13	$6,528	1	$502
DISABLED	YES	410	$212,325	26	$518
	NO	1,165	$615,183	74	$528
AGE 60 & ABV	YES	862	$431,610	55	$501
	NO	713	$395,899	45	$555
AGE 5 & BLW	YES	232	$128,122	15	$552
	NO	1,343	$699,387	85	$521
PAY_TYPE	DIRECT	5	$1,448	0	$290
	PROVIDER	1,571	$826,182	100	$526
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.18

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	53	$32,006	3	$604
	FuelOil	1,364	$699,497	87	$513
	Coal	13	$12,213	1	$939
	NaturalGas	2	$1,813	0	$906
	Kerosene	18	$10,333	1	$574
	Propane	88	$38,028	6	$432
	WoodOrOther	37	$33,619	2	$909
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	47	$31,007	3	$660
	1000 - 1999	5	$3,136	0	$627
	2000 - 2999	4	$2,839	0	$710
	3000 - 3999	2	$1,437	0	$718
	4000 - 4999	4	$2,650	0	$662
	5000 - 5999	3	$2,797	0	$932
	6000 - 6999	9	$4,353	1	$484
	7000 - 7999	7	$4,325	0	$618
	8000 - 8999	19	$9,162	1	$482
	9000 - 9999	7	$4,735	0	$676
	10000 - 10999	21	$10,794	1	$514
	11000 - 11999	84	$43,238	5	$515
	12000 - 12999	139	$69,937	9	$503
	13000 - 13999	64	$31,483	4	$492
	14000 - 14999	57	$30,783	4	$540
	15000 - 15999	62	$32,794	4	$529
	16000 - 16999	65	$36,239	4	$558
	17000 - 17999	66	$32,279	4	$489
	18000 - 18999	87	$44,194	6	$508
	19000 - 19999	83	$38,888	5	$469
	> 19999	740	$390,439	47	$528
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,575	$827,509		$525
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	1	$121		$121
TOTAL PMT		1,576	$827,630		$525
RECOUPMENTS		0	$0		$0
NET PAID			$827,630		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	773	$494,951	56	$640
	Renter	540	$322,986	39	$598
	RenterWithHeat	2	$869	0	$434
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	27	$12,673	2	$469
	Roomer	0	$0	0	$0
	Other	30	$18,876	2	$629
RACE	AmericanIndian	1	$619	0	$619
	Other	19	$10,374	1	$546
	NativeHawaiian	2	$948	0	$474
	Black	9	$4,438	1	$493
	White	1,329	$826,145	97	$622
	Asian	2	$874	0	$437
	Unknown	10	$6,956	1	$696
DISABLED	YES	499	$296,437	36	$594
	NO	873	$553,918	64	$634
AGE 60 & ABV	YES	677	$417,860	49	$617
	NO	695	$432,495	51	$622
AGE 5 & BLW	YES	153	$98,189	11	$642
	NO	1,219	$752,166	89	$617
PAY_TYPE	DIRECT	7	$2,963	1	$423
	PROVIDER	1,366	$847,592	99	$620
REFUNDS		5	$1,055		$211

AVERAGE HOUSEHOLD SIZE: 3.43

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	128	$73,979	9	$578
	FuelOil	723	$467,629	53	$647
	Coal	21	$18,864	2	$898
	NaturalGas	46	$21,924	3	$477
	Kerosene	163	$110,557	12	$678
	Propane	208	$100,926	15	$485
	WoodOrOther	27	$23,566	2	$873
	BlendedFuel	56	$32,909	4	$588
INCOME RANGE	0 - 999	56	$41,561	4	$742
	1000 - 1999	3	$2,378	0	$793
	2000 - 2999	8	$6,542	1	$818
	3000 - 3999	3	$2,592	0	$864
	4000 - 4999	5	$3,329	0	$666
	5000 - 5999	7	$5,080	1	$726
	6000 - 6999	2	$1,581	0	$790
	7000 - 7999	4	$2,995	0	$749
	8000 - 8999	17	$11,750	1	$691
	9000 - 9999	14	$10,232	1	$731
	10000 - 10999	19	$12,199	1	$642
	11000 - 11999	140	$80,329	10	$574
	12000 - 12999	113	$63,377	8	$561
	13000 - 13999	47	$27,057	3	$576
	14000 - 14999	41	$24,191	3	$590
	15000 - 15999	41	$26,346	3	$643
	16000 - 16999	54	$33,216	4	$615
	17000 - 17999	68	$41,556	5	$611
	18000 - 18999	65	$35,846	5	$551
	19000 - 19999	66	$38,758	5	$587
	> 19999	599	$379,439	44	$633
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,372	$850,355		$620
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	1	$200		$200
TOTAL PMT		1,373	$850,555		$619
RECOUPMENTS		1	$140		$140
NET PAID			$850,415		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	267	$136,716	63	$512
	Renter	138	$66,950	32	$485
	RenterWithHeat	2	$506	0	$253
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	6	$2,278	1	$380
	Roomer	0	$0	0	$0
	Other	13	$8,255	3	$635
RACE	AmericanIndian	2	$1,280	0	$640
	Other	4	$2,046	1	$512
	NativeHawaiian	0	$0	0	$0
	Black	4	$1,435	1	$359
	White	414	$208,944	97	$505
	Asian	0	$0	0	$0
	Unknown	2	$1,000	0	$500
DISABLED	YES	132	$63,097	31	$478
	NO	294	$151,608	69	$516
AGE 60 & ABV	YES	206	$102,000	48	$495
	NO	220	$112,705	52	$512
AGE 5 & BLW	YES	60	$35,300	14	$588
	NO	366	$179,405	86	$490
PAY_TYPE	DIRECT	1	$400	0	$400
	PROVIDER	426	$214,459	100	$503
REFUNDS		4	$1,036		$259

AVERAGE HOUSEHOLD SIZE: 3.18

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	99	$50,166	23	$507
	FuelOil	105	$62,350	25	$594
	Coal	0	$0	0	$0
	NaturalGas	42	$18,009	10	$429
	Kerosene	2	$934	0	$467
	Propane	174	$80,601	41	$463
	WoodOrOther	4	$2,645	1	$661
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	22	$12,469	5	$567
	1000 - 1999	0	$0	0	$0
	2000 - 2999	2	$1,126	0	$563
	3000 - 3999	0	$0	0	$0
	4000 - 4999	5	$1,691	1	$338
	5000 - 5999	2	$710	0	$355
	6000 - 6999	0	$0	0	$0
	7000 - 7999	0	$0	0	$0
	8000 - 8999	1	$346	0	$346
	9000 - 9999	4	$2,059	1	$515
	10000 - 10999	5	$2,005	1	$401
	11000 - 11999	33	$14,873	8	$451
	12000 - 12999	24	$10,283	6	$428
	13000 - 13999	14	$7,308	3	$522
	14000 - 14999	27	$11,795	6	$437
	15000 - 15999	17	$8,563	4	$504
	16000 - 16999	15	$7,142	4	$476
	17000 - 17999	30	$12,717	7	$424
	18000 - 18999	14	$9,501	3	$679
	19000 - 19999	14	$9,525	3	$680
	> 19999	197	$102,593	46	$521
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	426	$214,705		$504
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	1	$155		$155
TOTAL PMT		427	$214,860		$503
RECOUPMENTS		0	$0		$0
NET PAID			$214,860		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	256	$131,549	48	$514
	Renter	260	$129,934	48	$500
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	2	$494	0	$247
	Roomer	0	$0	0	$0
	Other	20	$10,358	4	$518
RACE	AmericanIndian	0	$0	0	$0
	Other	20	$11,423	4	$571
	NativeHawaiian	0	$0	0	$0
	Black	3	$1,812	1	$604
	White	510	$256,727	95	$503
	Asian	0	$0	0	$0
	Unknown	5	$2,373	1	$475
DISABLED	YES	144	$68,278	27	$474
	NO	394	$204,058	73	$518
AGE 60 & ABV	YES	285	$141,428	53	$496
	NO	253	$130,907	47	$517
AGE 5 & BLW	YES	84	$47,251	16	$563
	NO	454	$225,084	84	$496
PAY_TYPE	DIRECT	13	$6,321	2	$486
	PROVIDER	525	$266,014	98	$507
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.22

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	23	$14,999	4	$652
	FuelOil	373	$195,999	69	$525
	Coal	0	$0	0	$0
	NaturalGas	0	$0	0	$0
	Kerosene	4	$1,902	1	$476
	Propane	119	$45,945	22	$386
	WoodOrOther	19	$13,490	4	$710
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	11	$6,672	2	$607
	1000 - 1999	0	$0	0	$0
	2000 - 2999	5	$1,213	1	$243
	3000 - 3999	1	$735	0	$735
	4000 - 4999	3	$1,681	1	$560
	5000 - 5999	2	$1,431	0	$716
	6000 - 6999	5	$3,427	1	$685
	7000 - 7999	4	$2,515	1	$629
	8000 - 8999	1	$591	0	$591
	9000 - 9999	8	$2,091	1	$261
	10000 - 10999	4	$2,166	1	$542
	11000 - 11999	31	$14,198	6	$458
	12000 - 12999	19	$10,955	4	$577
	13000 - 13999	19	$9,505	4	$500
	14000 - 14999	20	$10,054	4	$503
	15000 - 15999	26	$13,256	5	$510
	16000 - 16999	28	$14,753	5	$527
	17000 - 17999	21	$10,086	4	$480
	18000 - 18999	41	$19,373	8	$473
	19000 - 19999	41	$19,772	8	$482
	> 19999	248	$127,860	46	$516
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	538	$272,335		$506
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		538	$272,335		$506
RECOUPMENTS		0	$0		$0
NET PAID			$272,335		

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	618	$334,267	48	$541
	Renter	604	$331,622	47	$549
	RenterWithHeat	8	$4,361	1	$545
	SubsidizedWithHeat	3	$1,528	0	$509
	SubsidizedNoHeat	29	$17,151	2	$591
	Roomer	0	$0	0	$0
	Other	21	$12,238	2	$583
RACE	AmericanIndian	4	$2,580	0	$645
	Other	82	$49,551	6	$604
	NativeHawaiian	2	$1,700	0	$850
	Black	68	$42,655	5	$627
	White	1,086	$582,050	85	$536
	Asian	3	$2,160	0	$720
	Unknown	38	$20,471	3	$539
DISABLED	YES	392	$211,530	31	$540
	NO	891	$489,637	69	$550
AGE 60 & ABV	YES	626	$311,920	49	$498
	NO	657	$389,247	51	$592
AGE 5 & BLW	YES	195	$114,047	15	$585
	NO	1,088	$587,120	85	$540
PAY_TYPE	DIRECT	5	$3,480	0	$696
	PROVIDER	1,278	$697,687	100	$546
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.15

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	229	$135,644	18	$592
	FuelOil	563	$330,330	44	$587
	Coal	9	$9,000	1	$1,000
	NaturalGas	101	$78,966	8	$782
	Kerosene	16	$11,701	1	$731
	Propane	342	$120,253	27	$352
	WoodOrOther	9	$7,049	1	$783
	BlendedFuel	14	$8,224	1	$587
INCOME RANGE	0 - 999	33	$22,389	3	$678
	1000 - 1999	2	$872	0	$436
	2000 - 2999	2	$1,978	0	$989
	3000 - 3999	5	$3,733	0	$747
	4000 - 4999	7	$3,120	1	$446
	5000 - 5999	4	$2,937	0	$734
	6000 - 6999	9	$4,364	1	$485
	7000 - 7999	16	$10,096	1	$631
	8000 - 8999	12	$6,558	1	$546
	9000 - 9999	12	$8,627	1	$719
	10000 - 10999	26	$12,486	2	$480
	11000 - 11999	98	$47,843	8	$488
	12000 - 12999	96	$49,908	7	$520
	13000 - 13999	37	$23,478	3	$635
	14000 - 14999	62	$30,217	5	$487
	15000 - 15999	50	$26,822	4	$536
	16000 - 16999	60	$34,100	5	$568
	17000 - 17999	55	$29,160	4	$530
	18000 - 18999	51	$24,744	4	$485
	19000 - 19999	39	$23,597	3	$605
	> 19999	606	$333,219	47	$550
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,283	$701,167		$547
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,283	$701,167		$547
RECOUPMENTS		0	$0		$0
NET PAID			$701,167		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	527	$275,357	38	$522
	Renter	810	$453,851	58	$560
	RenterWithHeat	1	$231	0	$231
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	51	$33,054	4	$648
	Roomer	0	$0	0	$0
	Other	10	$3,866	1	$387
RACE	AmericanIndian	5	$3,885	0	$777
	Other	214	$126,199	15	$590
	NativeHawaiian	1	$72	0	$72
	Black	122	$74,467	9	$610
	White	983	$522,870	70	$532
	Asian	15	$8,287	1	$552
	Unknown	59	$30,579	4	$518
DISABLED	YES	397	$196,282	28	$494
	NO	1,002	$570,077	72	$569
AGE 60 & ABV	YES	581	$284,747	42	$490
	NO	818	$481,612	58	$589
AGE 5 & BLW	YES	250	$147,363	18	$589
	NO	1,149	$618,996	82	$539
PAY_TYPE	DIRECT	10	$4,221	1	$422
	PROVIDER	1,389	$762,139	99	$549
REFUNDS		1	$274		$274

AVERAGE HOUSEHOLD SIZE: 3.84

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	267	$176,389	19	$661
	FuelOil	709	$408,644	51	$576
	Coal	7	$2,995	1	$428
	NaturalGas	48	$39,324	3	$819
	Kerosene	12	$7,956	1	$663
	Propane	355	$130,701	25	$368
	WoodOrOther	1	$350	0	$350
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	34	$24,837	2	$730
	1000 - 1999	2	$1,388	0	$694
	2000 - 2999	8	$2,688	1	$336
	3000 - 3999	3	$2,254	0	$751
	4000 - 4999	3	$1,902	0	$634
	5000 - 5999	6	$3,898	0	$650
	6000 - 6999	8	$5,239	1	$655
	7000 - 7999	8	$5,838	1	$730
	8000 - 8999	14	$9,029	1	$645
	9000 - 9999	16	$8,042	1	$503
	10000 - 10999	21	$11,969	2	$570
	11000 - 11999	65	$33,592	5	$517
	12000 - 12999	82	$42,140	6	$514
	13000 - 13999	46	$24,326	3	$529
	14000 - 14999	63	$30,815	5	$489
	15000 - 15999	44	$22,547	3	$512
	16000 - 16999	46	$24,710	3	$537
	17000 - 17999	68	$37,932	5	$558
	18000 - 18999	51	$24,572	4	$482
	19000 - 19999	77	$37,976	6	$493
	> 19999	732	$409,881	52	$560
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,399	$766,359		$548
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,399	$766,359		$548
RECOUPMENTS		0	$0		$0
NET PAID			$766,359		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	585	$328,986	50	$562
	Renter	498	$258,071	43	$518
	RenterWithHeat	4	$2,216	0	$554
	SubsidizedWithHeat	30	$11,902	3	$397
	SubsidizedNoHeat	15	$6,994	1	$466
	Roomer	0	$0	0	$0
	Other	27	$17,362	2	$643
RACE	AmericanIndian	1	$1,000	0	$1,000
	Other	8	$4,405	1	$551
	NativeHawaiian	0	$0	0	$0
	Black	113	$55,144	10	$488
	White	1,034	$561,984	89	$544
	Asian	0	$0	0	$0
	Unknown	3	$2,998	0	$999
DISABLED	YES	358	$186,132	31	$520
	NO	801	$439,399	69	$549
AGE 60 & ABV	YES	527	$275,216	45	$522
	NO	632	$350,315	55	$554
AGE 5 & BLW	YES	142	$81,929	12	$577
	NO	1,017	$543,602	88	$535
PAY_TYPE	DIRECT	4	$1,715	0	$429
	PROVIDER	1,157	$625,289	100	$540
REFUNDS		1	$130		$130

AVERAGE HOUSEHOLD SIZE: 3.23

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	272	$148,661	23	$547
	FuelOil	414	$239,339	36	$578
	Coal	2	$1,988	0	$994
	NaturalGas	201	$102,878	17	$512
	Kerosene	51	$30,494	4	$598
	Propane	167	$72,831	14	$436
	WoodOrOther	6	$4,568	1	$761
	BlendedFuel	46	$24,773	4	$539
INCOME RANGE	0 - 999	51	$28,322	4	$555
	1000 - 1999	1	$466	0	$466
	2000 - 2999	4	$1,714	0	$428
	3000 - 3999	9	$4,510	1	$501
	4000 - 4999	2	$1,764	0	$882
	5000 - 5999	7	$4,652	1	$665
	6000 - 6999	10	$7,683	1	$768
	7000 - 7999	8	$3,599	1	$450
	8000 - 8999	12	$6,317	1	$526
	9000 - 9999	10	$5,878	1	$588
	10000 - 10999	14	$6,745	1	$482
	11000 - 11999	65	$31,433	6	$484
	12000 - 12999	96	$45,732	8	$476
	13000 - 13999	34	$18,343	3	$540
	14000 - 14999	56	$27,245	5	$487
	15000 - 15999	51	$25,467	4	$499
	16000 - 16999	47	$24,851	4	$529
	17000 - 17999	50	$28,311	4	$566
	18000 - 18999	49	$23,899	4	$488
	19000 - 19999	50	$26,386	4	$528
	> 19999	531	$301,215	46	$567
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,159	$625,531		$540
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	2	$1,473		$736
TOTAL PMT		1,161	$627,004		$540
RECOUPMENTS		0	$0		$0
NET PAID			$627,004		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	589	$295,289	50	$501
	Renter	565	$296,029	48	$524
	RenterWithHeat	2	$941	0	$470
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	23	$12,529	2	$545
	Roomer	0	$0	0	$0
	Other	9	$3,953	1	$439
RACE	AmericanIndian	1	$679	0	$679
	Other	212	$116,075	18	$548
	NativeHawaiian	0	$0	0	$0
	Black	46	$25,593	4	$556
	White	888	$448,002	75	$505
	Asian	0	$0	0	$0
	Unknown	41	$18,392	3	$449
DISABLED	YES	287	$140,381	24	$489
	NO	901	$468,360	76	$520
AGE 60 & ABV	YES	543	$257,851	46	$475
	NO	645	$350,890	54	$544
AGE 5 & BLW	YES	239	$137,471	20	$575
	NO	949	$471,270	80	$497
PAY_TYPE	DIRECT	5	$754	0	$151
	PROVIDER	1,183	$607,987	100	$514
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.74

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	148	$85,900	12	$580
	FuelOil	793	$420,779	67	$531
	Coal	1	$999	0	$999
	NaturalGas	24	$16,925	2	$705
	Kerosene	15	$6,767	1	$451
	Propane	205	$75,397	17	$368
	WoodOrOther	2	$1,973	0	$986
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	28	$17,597	2	$628
	1000 - 1999	7	$2,595	1	$371
	2000 - 2999	5	$4,184	0	$837
	3000 - 3999	8	$5,549	1	$694
	4000 - 4999	2	$1,546	0	$773
	5000 - 5999	1	$101	0	$101
	6000 - 6999	7	$4,274	1	$611
	7000 - 7999	7	$4,080	1	$583
	8000 - 8999	8	$5,118	1	$640
	9000 - 9999	15	$6,380	1	$425
	10000 - 10999	19	$7,682	2	$404
	11000 - 11999	61	$29,352	5	$481
	12000 - 12999	65	$29,426	5	$453
	13000 - 13999	29	$15,621	2	$539
	14000 - 14999	45	$19,678	4	$437
	15000 - 15999	35	$17,139	3	$490
	16000 - 16999	57	$28,619	5	$502
	17000 - 17999	57	$24,402	5	$428
	18000 - 18999	63	$28,035	5	$445
	19000 - 19999	40	$20,208	3	$505
	> 19999	629	$337,153	53	$536
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,188	$608,741		$512
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,188	$608,741		$512
RECOUPMENTS		0	$0		$0
NET PAID			$608,741		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	675	$368,881	46	$546
	Renter	676	$420,576	46	$622
	RenterWithHeat	6	$5,434	0	$906
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	90	$52,139	6	$579
	Roomer	0	$0	0	$0
	Other	18	$9,589	1	$533
RACE	AmericanIndian	1	$258	0	$258
	Other	177	$110,258	12	$623
	NativeHawaiian	2	$1,000	0	$500
	Black	152	$101,404	10	$667
	White	1,059	$597,456	72	$564
	Asian	22	$11,692	2	$531
	Unknown	52	$34,551	4	$664
DISABLED	YES	326	$182,686	22	$560
	NO	1,139	$673,932	78	$592
AGE 60 & ABV	YES	604	$321,749	41	$533
	NO	861	$534,870	59	$621
AGE 5 & BLW	YES	300	$195,540	20	$652
	NO	1,165	$661,079	80	$567
PAY_TYPE	DIRECT	2	$1,145	0	$572
	PROVIDER	1,463	$855,473	100	$585
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.67

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	357	$248,635	24	$696
	FuelOil	943	$508,736	64	$539
	Coal	1	$1,000	0	$1,000
	NaturalGas	45	$39,388	3	$875
	Kerosene	38	$23,147	3	$609
	Propane	79	$34,372	5	$435
	WoodOrOther	2	$1,340	0	$670
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	36	$25,603	2	$711
	1000 - 1999	5	$4,298	0	$860
	2000 - 2999	8	$5,846	1	$731
	3000 - 3999	2	$1,325	0	$662
	4000 - 4999	6	$4,913	0	$819
	5000 - 5999	7	$5,387	0	$770
	6000 - 6999	8	$5,146	1	$643
	7000 - 7999	13	$8,915	1	$686
	8000 - 8999	14	$9,373	1	$670
	9000 - 9999	21	$12,543	1	$597
	10000 - 10999	20	$11,785	1	$589
	11000 - 11999	84	$43,356	6	$516
	12000 - 12999	103	$52,214	7	$507
	13000 - 13999	45	$25,676	3	$571
	14000 - 14999	57	$30,066	4	$527
	15000 - 15999	54	$31,545	4	$584
	16000 - 16999	55	$28,360	4	$516
	17000 - 17999	59	$33,943	4	$575
	18000 - 18999	58	$32,726	4	$564
	19000 - 19999	69	$38,762	5	$562
	> 19999	741	$444,836	51	$600
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,465	$856,618		$585
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,465	$856,618		$585
RECOUPMENTS		0	$0		$0
NET PAID			$856,618		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,841	$1,033,679	53	$561
	Renter	1,453	$840,529	42	$578
	RenterWithHeat	2	$643	0	$322
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	79	$45,516	2	$576
	Roomer	0	$0	0	$0
	Other	94	$44,995	3	$479
RACE	AmericanIndian	11	$5,703	0	$518
	Other	441	$280,200	13	$635
	NativeHawaiian	16	$10,074	0	$630
	Black	124	$81,163	4	$655
	White	2,813	$1,549,673	81	$551
	Asian	4	$3,071	0	$768
	Unknown	60	$35,476	2	$591
DISABLED	YES	957	$508,275	28	$531
	NO	2,512	$1,457,086	72	$580
AGE 60 & ABV	YES	1,720	$907,365	50	$528
	NO	1,749	$1,057,996	50	$605
AGE 5 & BLW	YES	549	$333,483	16	$607
	NO	2,920	$1,631,878	84	$559
PAY_TYPE	DIRECT	4	$2,177	0	$544
	PROVIDER	3,467	$1,964,189	100	$567
REFUNDS		6	$2,470		$412

AVERAGE HOUSEHOLD SIZE: 3.07

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	282	$189,232	8	$671
	FuelOil	2,146	$1,274,452	62	$594
	Coal	72	$67,167	2	$933
	NaturalGas	140	$108,816	4	$777
	Kerosene	48	$30,620	1	$638
	Propane	734	$269,805	21	$368
	WoodOrOther	5	$4,999	0	$1,000
	BlendedFuel	42	$20,269	1	$483
INCOME RANGE	0 - 999	90	$61,652	3	$685
	1000 - 1999	13	$8,745	0	$673
	2000 - 2999	11	$7,168	0	$652
	3000 - 3999	20	$12,389	1	$619
	4000 - 4999	12	$6,560	0	$547
	5000 - 5999	24	$11,136	1	$464
	6000 - 6999	27	$18,073	1	$669
	7000 - 7999	30	$18,608	1	$620
	8000 - 8999	31	$19,211	1	$620
	9000 - 9999	59	$32,419	2	$549
	10000 - 10999	72	$42,188	2	$586
	11000 - 11999	209	$114,313	6	$547
	12000 - 12999	278	$146,745	8	$528
	13000 - 13999	133	$77,182	4	$580
	14000 - 14999	175	$95,114	5	$544
	15000 - 15999	188	$101,302	5	$539
	16000 - 16999	168	$89,281	5	$531
	17000 - 17999	164	$88,773	5	$541
	18000 - 18999	175	$94,197	5	$538
	19000 - 19999	176	$93,546	5	$532
	> 19999	1,410	$825,287	41	$585
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	3,469	$1,965,361		$567
	Reissue	1	$1,000		$1,000
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	1	$5		$5
TOTAL PMT		3,471	$1,966,366		$567
RECOUPMENTS		1	$225		$225
NET PAID			$1,966,141		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	908	$469,370	50	$517
	Renter	808	$406,507	44	$503
	RenterWithHeat	12	$8,570	1	$714
	SubsidizedWithHeat	2	$913	0	$456
	SubsidizedNoHeat	25	$13,664	1	$547
	Roomer	0	$0	0	$0
	Other	63	$30,717	3	$488
RACE	AmericanIndian	5	$2,801	0	$560
	Other	16	$10,189	1	$637
	NativeHawaiian	6	$2,456	0	$409
	Black	86	$49,699	5	$578
	White	1,694	$858,872	93	$507
	Asian	2	$1,000	0	$500
	Unknown	9	$4,721	0	$525
DISABLED	YES	492	$245,073	27	$498
	NO	1,326	$684,666	73	$516
AGE 60 & ABV	YES	930	$454,568	51	$489
	NO	888	$475,171	49	$535
AGE 5 & BLW	YES	248	$139,562	14	$563
	NO	1,570	$790,178	86	$503
PAY_TYPE	DIRECT	10	$4,136	1	$414
	PROVIDER	1,808	$925,604	99	$512
REFUNDS		16	$881		$55

AVERAGE HOUSEHOLD SIZE: 3.22

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	130	$74,120	7	$570
	FuelOil	1,263	$646,696	69	$512
	Coal	16	$12,849	1	$803
	NaturalGas	62	$47,039	3	$759
	Kerosene	9	$3,983	0	$443
	Propane	261	$102,868	14	$394
	WoodOrOther	34	$21,999	2	$647
	BlendedFuel	43	$20,186	2	$469
INCOME RANGE	0 - 999	47	$28,403	3	$604
	1000 - 1999	4	$1,995	0	$499
	2000 - 2999	7	$4,305	0	$615
	3000 - 3999	14	$7,708	1	$551
	4000 - 4999	5	$2,213	0	$443
	5000 - 5999	8	$4,842	0	$605
	6000 - 6999	7	$3,978	0	$568
	7000 - 7999	17	$9,460	1	$556
	8000 - 8999	16	$7,047	1	$440
	9000 - 9999	27	$16,769	1	$621
	10000 - 10999	32	$16,050	2	$502
	11000 - 11999	105	$50,744	6	$483
	12000 - 12999	105	$50,732	6	$483
	13000 - 13999	71	$35,598	4	$501
	14000 - 14999	86	$45,971	5	$535
	15000 - 15999	77	$38,722	4	$503
	16000 - 16999	78	$40,256	4	$516
	17000 - 17999	76	$36,425	4	$479
	18000 - 18999	94	$44,201	5	$470
	19000 - 19999	90	$46,680	5	$519
	> 19999	852	$437,639	47	$514
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,818	$929,739		$511
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,818	$929,739		$511
RECOUPMENTS		0	$0		$0
NET PAID			$929,739		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	146	$81,239	55	$556
	Renter	97	$44,716	36	$461
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	10	$4,499	4	$450
	Roomer	0	$0	0	$0
	Other	13	$5,976	5	$460
RACE	AmericanIndian	2	$1,469	1	$734
	Other	1	$229	0	$229
	NativeHawaiian	0	$0	0	$0
	Black	2	$612	1	$306
	White	261	$134,121	98	$514
	Asian	0	$0	0	$0
	Unknown	0	$0	0	$0
DISABLED	YES	89	$43,181	33	$485
	NO	177	$93,250	67	$527
AGE 60 & ABV	YES	111	$56,405	42	$508
	NO	155	$80,025	58	$516
AGE 5 & BLW	YES	39	$21,358	15	$548
	NO	227	$115,073	85	$507
PAY_TYPE	DIRECT	1	$578	0	$578
	PROVIDER	265	$135,852	100	$513
REFUNDS		3	$990		$330

AVERAGE HOUSEHOLD SIZE: 3.78

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	75	$37,737	28	$503
	FuelOil	6	$3,348	2	$558
	Coal	2	$1,998	1	$999
	NaturalGas	78	$37,748	29	$484
	Kerosene	1	$1,000	0	$1,000
	Propane	73	$25,474	27	$349
	WoodOrOther	31	$29,125	12	$940
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	13	$6,422	5	$494
	1000 - 1999	0	$0	0	$0
	2000 - 2999	3	$1,439	1	$480
	3000 - 3999	3	$2,594	1	$865
	4000 - 4999	1	$1,000	0	$1,000
	5000 - 5999	1	$234	0	$234
	6000 - 6999	1	$885	0	$885
	7000 - 7999	1	$1,000	0	$1,000
	8000 - 8999	3	$1,940	1	$647
	9000 - 9999	2	$1,309	1	$654
	10000 - 10999	3	$1,473	1	$491
	11000 - 11999	27	$15,071	10	$558
	12000 - 12999	21	$10,660	8	$508
	13000 - 13999	12	$5,099	5	$425
	14000 - 14999	8	$5,357	3	$670
	15000 - 15999	8	$3,799	3	$475
	16000 - 16999	13	$4,896	5	$377
	17000 - 17999	13	$5,123	5	$394
	18000 - 18999	11	$5,185	4	$471
	19000 - 19999	11	$4,300	4	$391
	> 19999	111	$58,645	42	$528
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	266	$136,430		$513
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		266	$136,430		$513
RECOUPMENTS		0	$0		$0
NET PAID			$136,430		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	420	$234,424	48	$558
	Renter	384	$189,930	44	$495
	RenterWithHeat	3	$1,278	0	$426
	SubsidizedWithHeat	6	$2,065	1	$344
	SubsidizedNoHeat	49	$18,657	6	$381
	Roomer	0	$0	0	$0
	Other	14	$8,632	2	$617
RACE	AmericanIndian	0	$0	0	$0
	Other	4	$1,384	0	$346
	NativeHawaiian	0	$0	0	$0
	Black	129	$59,615	15	$462
	White	738	$391,854	84	$531
	Asian	1	$439	0	$439
	Unknown	4	$1,693	0	$423
DISABLED	YES	318	$157,645	36	$496
	NO	558	$297,340	64	$533
AGE 60 & ABV	YES	353	$188,620	40	$534
	NO	523	$266,366	60	$509
AGE 5 & BLW	YES	136	$70,490	16	$518
	NO	740	$384,496	84	$520
PAY_TYPE	DIRECT	9	$3,431	1	$381
	PROVIDER	867	$451,554	99	$521
REFUNDS		6	$1,230		$205

AVERAGE HOUSEHOLD SIZE: 3.33

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	271	$131,695	31	$486
	FuelOil	236	$142,197	27	$603
	Coal	2	$1,949	0	$974
	NaturalGas	178	$80,191	20	$451
	Kerosene	7	$4,212	1	$602
	Propane	139	$67,803	16	$488
	WoodOrOther	18	$12,380	2	$688
	BlendedFuel	25	$14,558	3	$582
INCOME RANGE	0 - 999	36	$18,376	4	$510
	1000 - 1999	2	$332	0	$166
	2000 - 2999	5	$1,270	1	$254
	3000 - 3999	8	$4,764	1	$596
	4000 - 4999	2	$1,063	0	$532
	5000 - 5999	7	$3,012	1	$430
	6000 - 6999	4	$2,171	0	$543
	7000 - 7999	8	$2,660	1	$332
	8000 - 8999	14	$7,532	2	$538
	9000 - 9999	10	$4,331	1	$433
	10000 - 10999	13	$5,728	1	$441
	11000 - 11999	69	$36,695	8	$532
	12000 - 12999	83	$42,615	9	$513
	13000 - 13999	30	$13,709	3	$457
	14000 - 14999	34	$17,958	4	$528
	15000 - 15999	37	$19,682	4	$532
	16000 - 16999	45	$19,628	5	$436
	17000 - 17999	42	$21,586	5	$514
	18000 - 18999	33	$17,902	4	$542
	19000 - 19999	34	$16,692	4	$491
	> 19999	359	$196,969	41	$549
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	876	$454,985		$519
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		876	$454,985		$519
RECOUPMENTS		0	$0		$0
NET PAID			$454,985		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	669	$336,858	52	$504
	Renter	558	$278,662	43	$499
	RenterWithHeat	1	$169	0	$169
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	27	$13,882	2	$514
	Roomer	0	$0	0	$0
	Other	31	$15,765	2	$509
RACE	AmericanIndian	0	$0	0	$0
	Other	10	$4,862	1	$486
	NativeHawaiian	0	$0	0	$0
	Black	18	$9,476	1	$526
	White	1,251	$627,169	97	$501
	Asian	0	$0	0	$0
	Unknown	7	$3,828	1	$547
DISABLED	YES	356	$174,441	28	$490
	NO	930	$470,895	72	$506
AGE 60 & ABV	YES	725	$348,660	56	$481
	NO	561	$296,676	44	$529
AGE 5 & BLW	YES	190	$101,069	15	$532
	NO	1,096	$544,267	85	$497
PAY_TYPE	DIRECT	3	$375	0	$125
	PROVIDER	1,283	$644,961	100	$503
REFUNDS		3	$375		$125

AVERAGE HOUSEHOLD SIZE: 3.41

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	85	$48,332	7	$569
	FuelOil	989	$498,631	77	$504
	Coal	4	$2,700	0	$675
	NaturalGas	11	$6,997	1	$636
	Kerosene	5	$2,917	0	$583
	Propane	147	$53,814	11	$366
	WoodOrOther	42	$30,493	3	$726
	BlendedFuel	3	$1,452	0	$484
INCOME RANGE	0 - 999	29	$18,066	2	$623
	1000 - 1999	0	$0	0	$0
	2000 - 2999	8	$4,118	1	$515
	3000 - 3999	4	$2,046	0	$512
	4000 - 4999	7	$4,271	1	$610
	5000 - 5999	8	$4,425	1	$553
	6000 - 6999	3	$2,224	0	$741
	7000 - 7999	5	$3,509	0	$702
	8000 - 8999	10	$6,097	1	$610
	9000 - 9999	13	$7,009	1	$539
	10000 - 10999	23	$11,548	2	$502
	11000 - 11999	74	$35,028	6	$473
	12000 - 12999	85	$40,798	7	$480
	13000 - 13999	25	$11,712	2	$468
	14000 - 14999	53	$24,226	4	$457
	15000 - 15999	60	$30,735	5	$512
	16000 - 16999	58	$27,209	5	$469
	17000 - 17999	75	$34,578	6	$461
	18000 - 18999	59	$31,551	5	$535
	19000 - 19999	83	$39,962	6	$481
	> 19999	603	$305,899	47	$507
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,286	$645,336		$502
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,286	$645,336		$502
RECOUPMENTS		0	$0		$0
NET PAID			$645,336		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	886	$471,845	58	$533
	Renter	580	$336,929	38	$581
	RenterWithHeat	1	$185	0	$185
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	47	$25,866	3	$550
	Roomer	0	$0	0	$0
	Other	18	$10,033	1	$557
RACE	AmericanIndian	3	$1,409	0	$470
	Other	201	$117,848	13	$586
	NativeHawaiian	14	$8,124	1	$580
	Black	172	$101,299	11	$589
	White	1,060	$574,760	69	$542
	Asian	18	$9,073	1	$504
	Unknown	64	$32,345	4	$505
DISABLED	YES	380	$205,962	25	$542
	NO	1,152	$638,897	75	$555
AGE 60 & ABV	YES	823	$429,384	54	$522
	NO	709	$415,475	46	$586
AGE 5 & BLW	YES	210	$128,773	14	$613
	NO	1,322	$716,085	86	$542
PAY_TYPE	DIRECT	13	$1,507	1	$116
	PROVIDER	1,523	$843,833	99	$554
REFUNDS		4	$314		$78

AVERAGE HOUSEHOLD SIZE: 3.2

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	201	$139,293	13	$693
	FuelOil	706	$399,248	46	$566
	Coal	16	$6,830	1	$427
	NaturalGas	7	$6,533	0	$933
	Kerosene	82	$48,654	5	$593
	Propane	502	$232,453	33	$463
	WoodOrOther	9	$7,102	1	$789
	BlendedFuel	9	$4,746	1	$527
INCOME RANGE	0 - 999	70	$40,316	5	$576
	1000 - 1999	4	$3,206	0	$802
	2000 - 2999	7	$4,671	0	$667
	3000 - 3999	7	$4,861	0	$694
	4000 - 4999	4	$2,845	0	$711
	5000 - 5999	5	$3,872	0	$774
	6000 - 6999	16	$8,605	1	$538
	7000 - 7999	9	$5,524	1	$614
	8000 - 8999	21	$9,836	1	$468
	9000 - 9999	13	$7,069	1	$544
	10000 - 10999	23	$14,983	2	$651
	11000 - 11999	114	$56,829	7	$498
	12000 - 12999	97	$46,750	6	$482
	13000 - 13999	64	$33,043	4	$516
	14000 - 14999	78	$41,749	5	$535
	15000 - 15999	52	$31,384	3	$604
	16000 - 16999	57	$30,827	4	$541
	17000 - 17999	55	$29,562	4	$537
	18000 - 18999	62	$32,657	4	$527
	19000 - 19999	72	$37,054	5	$515
	> 19999	702	$399,216	46	$569
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,532	$844,859		$551
	Reissue	2	$200		$100
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	2	$281		$140
TOTAL PMT		1,536	$845,340		$550
RECOUPMENTS		0	$0		$0
NET PAID			$845,340		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	499	$280,169	41	$561
	Renter	541	$327,617	44	$606
	RenterWithHeat	2	$820	0	$410
	SubsidizedWithHeat	3	$2,032	0	$677
	SubsidizedNoHeat	159	$97,328	13	$612
	Roomer	0	$0	0	$0
	Other	12	$6,811	1	$568
RACE	AmericanIndian	3	$1,617	0	$539
	Other	93	$53,328	8	$573
	NativeHawaiian	2	$1,000	0	$500
	Black	379	$234,475	31	$619
	White	678	$388,248	56	$573
	Asian	29	$16,860	2	$581
	Unknown	32	$19,250	3	$602
DISABLED	YES	351	$197,490	29	$563
	NO	865	$517,288	71	$598
AGE 60 & ABV	YES	485	$265,270	40	$547
	NO	731	$449,508	60	$615
AGE 5 & BLW	YES	225	$135,310	19	$601
	NO	991	$579,467	81	$585
PAY_TYPE	DIRECT	5	$787	0	$157
	PROVIDER	1,211	$713,991	100	$590
REFUNDS		7	$1,769		$253

AVERAGE HOUSEHOLD SIZE: 3.4

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	219	$149,932	18	$685
	FuelOil	814	$450,576	67	$554
	Coal	0	$0	0	$0
	NaturalGas	139	$95,145	11	$684
	Kerosene	1	$871	0	$871
	Propane	43	$18,254	4	$425
	WoodOrOther	0	$0	0	$0
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	57	$37,302	5	$654
	1000 - 1999	4	$3,163	0	$791
	2000 - 2999	8	$4,431	1	$554
	3000 - 3999	5	$3,435	0	$687
	4000 - 4999	6	$4,796	0	$799
	5000 - 5999	6	$3,421	0	$570
	6000 - 6999	8	$4,015	1	$502
	7000 - 7999	13	$6,630	1	$510
	8000 - 8999	10	$5,593	1	$559
	9000 - 9999	15	$8,449	1	$563
	10000 - 10999	21	$13,021	2	$620
	11000 - 11999	68	$36,040	6	$530
	12000 - 12999	87	$48,931	7	$562
	13000 - 13999	42	$22,480	3	$535
	14000 - 14999	44	$25,030	4	$569
	15000 - 15999	41	$19,693	3	$480
	16000 - 16999	52	$29,503	4	$567
	17000 - 17999	48	$26,572	4	$554
	18000 - 18999	43	$25,057	4	$583
	19000 - 19999	55	$30,557	5	$556
	> 19999	583	$356,662	48	$612
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,216	$714,778		$588
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,216	$714,778		$588
RECOUPMENTS		0	$0		$0
NET PAID			$714,778		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	132	$64,523	60	$489
	Renter	73	$35,153	33	$482
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	12	$6,344	5	$529
	Roomer	0	$0	0	$0
	Other	4	$2,000	2	$500
RACE	AmericanIndian	0	$0	0	$0
	Other	2	$315	1	$158
	NativeHawaiian	0	$0	0	$0
	Black	8	$4,367	4	$546
	White	205	$100,486	93	$490
	Asian	0	$0	0	$0
	Unknown	6	$2,852	3	$475
DISABLED	YES	64	$30,656	29	$479
	NO	157	$77,364	71	$493
AGE 60 & ABV	YES	117	$57,455	53	$491
	NO	104	$50,565	47	$486
AGE 5 & BLW	YES	35	$18,846	16	$538
	NO	186	$89,174	84	$479
PAY_TYPE	DIRECT	2	$845	1	$422
	PROVIDER	219	$107,175	99	$489
REFUNDS		1	$204		$204

AVERAGE HOUSEHOLD SIZE: 2.69

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	17	$10,072	8	$592
	FuelOil	117	$61,067	53	$522
	Coal	0	$0	0	$0
	NaturalGas	3	$2,305	1	$768
	Kerosene	4	$2,000	2	$500
	Propane	80	$32,576	36	$407
	WoodOrOther	0	$0	0	$0
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	1	$173	0	$173
	1000 - 1999	0	$0	0	$0
	2000 - 2999	0	$0	0	$0
	3000 - 3999	0	$0	0	$0
	4000 - 4999	0	$0	0	$0
	5000 - 5999	0	$0	0	$0
	6000 - 6999	2	$753	1	$376
	7000 - 7999	1	$454	0	$454
	8000 - 8999	2	$1,000	1	$500
	9000 - 9999	1	$1,000	0	$1,000
	10000 - 10999	6	$3,351	3	$558
	11000 - 11999	13	$6,594	6	$507
	12000 - 12999	15	$8,241	7	$549
	13000 - 13999	10	$4,350	5	$435
	14000 - 14999	16	$7,635	7	$477
	15000 - 15999	8	$3,655	4	$457
	16000 - 16999	9	$5,333	4	$593
	17000 - 17999	10	$4,467	5	$447
	18000 - 18999	10	$5,124	5	$512
	19000 - 19999	17	$6,692	8	$394
	> 19999	100	$49,197	45	$492
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	221	$108,020		$489
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		221	$108,020		$489
RECOUPMENTS		0	$0		$0
NET PAID			$108,020		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	667	$345,650	53	$518
	Renter	533	$301,364	43	$565
	RenterWithHeat	2	$1,474	0	$737
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	40	$26,349	3	$659
	Roomer	0	$0	0	$0
	Other	12	$7,006	1	$584
RACE	AmericanIndian	2	$1,307	0	$654
	Other	149	$83,418	12	$560
	NativeHawaiian	6	$3,653	0	$609
	Black	87	$56,009	7	$644
	White	975	$516,374	78	$530
	Asian	6	$3,947	0	$658
	Unknown	29	$17,135	2	$591
DISABLED	YES	322	$166,730	26	$518
	NO	932	$515,113	74	$553
AGE 60 & ABV	YES	614	$307,870	49	$501
	NO	640	$373,973	51	$584
AGE 5 & BLW	YES	195	$114,200	16	$586
	NO	1,059	$567,643	84	$536
PAY_TYPE	DIRECT	4	$1,586	0	$396
	PROVIDER	1,251	$680,382	100	$544
REFUNDS		1	$206		$206

AVERAGE HOUSEHOLD SIZE: 3.03

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	161	$98,174	13	$610
	FuelOil	817	$443,300	65	$543
	Coal	3	$3,000	0	$1,000
	NaturalGas	40	$31,625	3	$791
	Kerosene	70	$36,819	6	$526
	Propane	156	$63,536	12	$407
	WoodOrOther	6	$4,891	0	$815
	BlendedFuel	1	$498	0	$498
INCOME RANGE	0 - 999	34	$21,140	3	$622
	1000 - 1999	4	$2,212	0	$553
	2000 - 2999	1	$828	0	$828
	3000 - 3999	5	$2,422	0	$484
	4000 - 4999	7	$4,889	1	$698
	5000 - 5999	3	$1,486	0	$495
	6000 - 6999	12	$7,549	1	$629
	7000 - 7999	5	$3,634	0	$727
	8000 - 8999	8	$3,323	1	$415
	9000 - 9999	22	$12,834	2	$583
	10000 - 10999	23	$10,835	2	$471
	11000 - 11999	44	$22,985	4	$522
	12000 - 12999	84	$46,553	7	$554
	13000 - 13999	47	$26,501	4	$564
	14000 - 14999	54	$27,073	4	$501
	15000 - 15999	46	$22,708	4	$494
	16000 - 16999	66	$32,420	5	$491
	17000 - 17999	56	$31,489	4	$562
	18000 - 18999	58	$29,089	5	$502
	19000 - 19999	68	$34,670	5	$510
	> 19999	606	$336,367	48	$555
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,254	$681,843		$544
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	1	$125		$125
TOTAL PMT		1,255	$681,968		$543
RECOUPMENTS		0	$0		$0
NET PAID			$681,968		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,348	$728,681	57	$541
	Renter	876	$477,013	37	$545
	RenterWithHeat	1	$112	0	$112
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	70	$35,194	3	$503
	Roomer	0	$0	0	$0
	Other	79	$39,161	3	$496
RACE	AmericanIndian	5	$1,743	0	$349
	Other	82	$45,549	3	$555
	NativeHawaiian	1	$394	0	$394
	Black	56	$36,893	2	$659
	White	2,196	$1,176,944	93	$536
	Asian	11	$5,735	0	$521
	Unknown	23	$12,904	1	$561
DISABLED	YES	677	$345,191	29	$510
	NO	1,697	$934,970	71	$551
AGE 60 & ABV	YES	1,129	$589,113	48	$522
	NO	1,245	$691,049	52	$555
AGE 5 & BLW	YES	372	$215,889	16	$580
	NO	2,002	$1,064,272	84	$532
PAY_TYPE	DIRECT	17	$9,509	1	$559
	PROVIDER	2,361	$1,271,486	99	$539
REFUNDS		1	$1,000		$1,000

AVERAGE HOUSEHOLD SIZE: 3.32

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	118	$72,474	5	$614
	FuelOil	1,993	$1,073,429	84	$539
	Coal	39	$31,510	2	$808
	NaturalGas	27	$21,338	1	$790
	Kerosene	0	$0	0	$0
	Propane	179	$69,232	8	$387
	WoodOrOther	16	$11,180	1	$699
	BlendedFuel	2	$1,000	0	$500
INCOME RANGE	0 - 999	115	$71,013	5	$618
	1000 - 1999	7	$4,619	0	$660
	2000 - 2999	12	$8,764	1	$730
	3000 - 3999	3	$1,779	0	$593
	4000 - 4999	13	$8,081	1	$622
	5000 - 5999	15	$9,068	1	$605
	6000 - 6999	22	$12,753	1	$580
	7000 - 7999	8	$4,972	0	$622
	8000 - 8999	21	$11,535	1	$549
	9000 - 9999	30	$17,668	1	$589
	10000 - 10999	55	$25,252	2	$459
	11000 - 11999	168	$79,935	7	$476
	12000 - 12999	167	$86,914	7	$520
	13000 - 13999	76	$39,471	3	$519
	14000 - 14999	95	$48,316	4	$509
	15000 - 15999	86	$45,615	4	$530
	16000 - 16999	124	$63,044	5	$508
	17000 - 17999	109	$57,122	5	$524
	18000 - 18999	129	$68,279	5	$529
	19000 - 19999	121	$62,399	5	$516
	> 19999	998	$553,563	42	$555
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	2,374	$1,280,161		$539
	Reissue	2	$469		$234
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	2	$365		$182
TOTAL PMT		2,378	$1,280,995		$539
RECOUPMENTS		1	$152		$152
NET PAID			$1,280,843		

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	301	$153,659	45	$510
	Renter	298	$156,505	45	$525
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	1	$134	0	$134
	SubsidizedNoHeat	39	$17,588	6	$451
	Roomer	0	$0	0	$0
	Other	28	$12,541	4	$448
RACE	AmericanIndian	4	$2,533	1	$633
	Other	11	$5,009	2	$455
	NativeHawaiian	1	$222	0	$222
	Black	8	$5,428	1	$678
	White	638	$324,304	96	$508
	Asian	0	$0	0	$0
	Unknown	5	$2,931	1	$586
DISABLED	YES	215	$103,739	32	$483
	NO	452	$236,688	68	$524
AGE 60 & ABV	YES	354	$170,461	53	$482
	NO	313	$169,966	47	$543
AGE 5 & BLW	YES	108	$59,289	16	$549
	NO	559	$281,138	84	$503
PAY_TYPE	DIRECT	17	$4,950	3	$291
	PROVIDER	651	$335,489	97	$515
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.4

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	37	$22,300	6	$603
	FuelOil	426	$225,662	64	$530
	Coal	3	$2,854	0	$951
	NaturalGas	0	$0	0	$0
	Kerosene	2	$1,459	0	$730
	Propane	193	$82,160	29	$426
	WoodOrOther	6	$5,994	1	$999
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	19	$13,756	3	$724
	1000 - 1999	2	$1,979	0	$990
	2000 - 2999	2	$961	0	$480
	3000 - 3999	0	$0	0	$0
	4000 - 4999	1	$1,000	0	$1,000
	5000 - 5999	4	$1,858	1	$464
	6000 - 6999	0	$0	0	$0
	7000 - 7999	0	$0	0	$0
	8000 - 8999	3	$1,567	0	$522
	9000 - 9999	8	$4,520	1	$565
	10000 - 10999	13	$6,666	2	$513
	11000 - 11999	42	$18,733	6	$446
	12000 - 12999	56	$25,269	8	$451
	13000 - 13999	31	$12,544	5	$405
	14000 - 14999	28	$13,001	4	$464
	15000 - 15999	39	$18,044	6	$463
	16000 - 16999	27	$14,209	4	$526
	17000 - 17999	25	$11,799	4	$472
	18000 - 18999	30	$14,774	4	$492
	19000 - 19999	31	$17,159	5	$554
	> 19999	306	$162,589	46	$531
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	667	$340,427		$510
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	1	$11		$11
TOTAL PMT		668	$340,438		$510
RECOUPMENTS		0	$0		$0
NET PAID			$340,438		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	3,237	$1,695,871	40	$524
	Renter	3,945	$2,291,983	49	$581
	RenterWithHeat	23	$14,617	0	$636
	SubsidizedWithHeat	3	$2,080	0	$693
	SubsidizedNoHeat	807	$460,982	10	$571
	Roomer	0	$0	0	$0
	Other	103	$60,588	1	$588
RACE	AmericanIndian	26	$13,392	0	$515
	Other	1,189	$663,390	15	$558
	NativeHawaiian	10	$5,251	0	$525
	Black	5,639	$3,170,921	69	$562
	White	1,038	$556,858	13	$536
	Asian	115	$60,180	1	$523
	Unknown	101	$56,130	1	$556
DISABLED	YES	2,416	$1,294,848	30	$536
	NO	5,702	$3,231,274	70	$567
AGE 60 & ABV	YES	3,300	$1,652,910	41	$501
	NO	4,818	$2,873,212	59	$596
AGE 5 & BLW	YES	1,500	$930,354	18	$620
	NO	6,618	$3,595,768	82	$543
PAY_TYPE	DIRECT	4	$1,507	0	$377
	PROVIDER	8,118	$4,527,844	100	$558
REFUNDS		12	$4,806		$400

AVERAGE HOUSEHOLD SIZE: 3.59

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	2,008	$1,166,407	25	$581
	FuelOil	2,240	$1,145,865	28	$512
	Coal	0	$0	0	$0
	NaturalGas	3,870	$2,213,850	48	$572
	Kerosene	0	$0	0	$0
	Propane	0	$0	0	$0
	WoodOrOther	0	$0	0	$0
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	316	$202,850	4	$642
	1000 - 1999	44	$24,491	1	$557
	2000 - 2999	49	$28,664	1	$585
	3000 - 3999	60	$33,537	1	$559
	4000 - 4999	72	$48,000	1	$667
	5000 - 5999	44	$30,795	1	$700
	6000 - 6999	58	$36,849	1	$635
	7000 - 7999	82	$51,893	1	$633
	8000 - 8999	75	$45,642	1	$609
	9000 - 9999	101	$58,503	1	$579
	10000 - 10999	143	$82,840	2	$579
	11000 - 11999	725	$364,844	9	$503
	12000 - 12999	841	$420,512	10	$500
	13000 - 13999	287	$152,115	4	$530
	14000 - 14999	351	$184,376	4	$525
	15000 - 15999	324	$176,803	4	$546
	16000 - 16999	270	$144,845	3	$536
	17000 - 17999	334	$180,861	4	$542
	18000 - 18999	305	$158,067	4	$518
	19000 - 19999	332	$178,979	4	$539
	> 19999	3,300	$1,917,970	41	$581
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	8,118	$4,526,122		$558
	Reissue	2	$1,917		$958
	Secondpay	1	$312		$312
	Underpay	0	$0		$0
	Extraordinary	1	$1,000		$1,000
TOTAL PMT		8,122	$4,529,351		$558
RECOUPMENTS		0	$0		$0
NET PAID			$4,529,351		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	308	$172,271	50	$559
	Renter	211	$116,892	34	$554
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	79	$45,146	13	$571
	Roomer	0	$0	0	$0
	Other	14	$8,885	2	$635
RACE	AmericanIndian	8	$4,531	1	$566
	Other	53	$30,263	9	$571
	NativeHawaiian	0	$0	0	$0
	Black	53	$32,930	9	$621
	White	479	$263,369	78	$550
	Asian	3	$1,279	0	$426
	Unknown	16	$10,823	3	$676
DISABLED	YES	146	$74,362	24	$509
	NO	466	$268,833	76	$577
AGE 60 & ABV	YES	297	$160,555	49	$541
	NO	315	$182,640	51	$580
AGE 5 & BLW	YES	85	$49,120	14	$578
	NO	527	$294,074	86	$558
PAY_TYPE	DIRECT	0	$0	0	$0
	PROVIDER	614	$343,311	100	$559
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	106	$80,183	17	$756
	FuelOil	224	$128,561	37	$574
	Coal	1	$1,000	0	$1,000
	NaturalGas	19	$15,481	3	$815
	Kerosene	29	$15,974	5	$551
	Propane	226	$98,204	37	$435
	WoodOrOther	1	$1,000	0	$1,000
	BlendedFuel	6	$2,791	1	$465
INCOME RANGE	0 - 999	19	$12,292	3	$647
	1000 - 1999	2	$1,531	0	$766
	2000 - 2999	2	$1,449	0	$724
	3000 - 3999	3	$1,715	0	$572
	4000 - 4999	2	$2,000	0	$1,000
	5000 - 5999	2	$1,208	0	$604
	6000 - 6999	12	$5,597	2	$466
	7000 - 7999	6	$3,839	1	$640
	8000 - 8999	10	$7,331	2	$733
	9000 - 9999	10	$4,393	2	$439
	10000 - 10999	13	$6,061	2	$466
	11000 - 11999	18	$10,370	3	$576
	12000 - 12999	38	$18,721	6	$493
	13000 - 13999	30	$16,248	5	$542
	14000 - 14999	34	$15,735	6	$463
	15000 - 15999	10	$6,585	2	$658
	16000 - 16999	17	$7,166	3	$422
	17000 - 17999	22	$11,765	4	$535
	18000 - 18999	27	$13,598	4	$504
	19000 - 19999	41	$23,195	7	$566
	> 19999	294	$172,395	48	$586
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	612	$343,195		$561
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	2	$116		$58
TOTAL PMT		614	$343,311		$559
RECOUPMENTS		0	$0		$0
NET PAID			$343,311		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	63	$36,644	59	$582
	Renter	30	$20,232	28	$674
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	6	$4,430	6	$738
	Roomer	0	$0	0	$0
	Other	8	$3,266	7	$408
RACE	AmericanIndian	1	$79	1	$79
	Other	0	$0	0	$0
	NativeHawaiian	0	$0	0	$0
	Black	3	$2,000	3	$667
	White	103	$62,494	96	$607
	Asian	0	$0	0	$0
	Unknown	0	$0	0	$0
DISABLED	YES	40	$24,198	37	$605
	NO	67	$40,375	63	$603
AGE 60 & ABV	YES	51	$27,950	48	$548
	NO	56	$36,622	52	$654
AGE 5 & BLW	YES	9	$5,351	8	$595
	NO	98	$59,221	92	$604
PAY_TYPE	DIRECT	3	$506	3	$169
	PROVIDER	104	$64,067	97	$616
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 4.09

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	31	$18,082	29	$583
	FuelOil	6	$4,374	6	$729
	Coal	5	$4,000	5	$800
	NaturalGas	12	$7,362	11	$614
	Kerosene	1	$1,000	1	$1,000
	Propane	40	$17,768	37	$444
	WoodOrOther	12	$11,987	11	$999
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	5	$2,627	5	$525
	1000 - 1999	0	$0	0	$0
	2000 - 2999	1	$1,000	1	$1,000
	3000 - 3999	1	$630	1	$630
	4000 - 4999	0	$0	0	$0
	5000 - 5999	1	$293	1	$293
	6000 - 6999	0	$0	0	$0
	7000 - 7999	2	$2,000	2	$1,000
	8000 - 8999	0	$0	0	$0
	9000 - 9999	0	$0	0	$0
	10000 - 10999	3	$1,513	3	$504
	11000 - 11999	6	$3,000	6	$500
	12000 - 12999	11	$5,587	10	$508
	13000 - 13999	1	$1,000	1	$1,000
	14000 - 14999	3	$1,892	3	$631
	15000 - 15999	3	$1,999	3	$666
	16000 - 16999	4	$3,481	4	$870
	17000 - 17999	5	$4,681	5	$936
	18000 - 18999	1	$556	1	$556
	19000 - 19999	0	$0	0	$0
	> 19999	60	$34,316	56	$572
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	107	$64,573		$603
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		107	$64,573		$603
RECOUPMENTS		0	$0		$0
NET PAID			$64,573		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	2,531	$1,474,086	61	$582
	Renter	1,424	$824,988	34	$579
	RenterWithHeat	2	$1,697	0	$848
	SubsidizedWithHeat	3	$242	0	$81
	SubsidizedNoHeat	82	$41,658	2	$508
	Roomer	1	$709	0	$709
	Other	98	$52,619	2	$537
RACE	AmericanIndian	9	$5,052	0	$561
	Other	286	$178,646	7	$625
	NativeHawaiian	4	$2,245	0	$561
	Black	123	$74,403	3	$605
	White	3,658	$2,098,921	88	$574
	Asian	8	$4,425	0	$553
	Unknown	53	$32,306	1	$610
DISABLED	YES	1,117	$618,413	27	$554
	NO	3,024	$1,777,585	73	$588
AGE 60 & ABV	YES	2,215	$1,224,978	53	$553
	NO	1,926	$1,171,020	47	$608
AGE 5 & BLW	YES	612	$382,273	15	$625
	NO	3,529	$2,013,726	85	$571
PAY_TYPE	DIRECT	26	$9,962	1	$383
	PROVIDER	4,117	$2,386,924	99	$580
REFUNDS		4	$159		$40

AVERAGE HOUSEHOLD SIZE: 3.2

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	171	$100,384	4	$587
	FuelOil	3,307	$1,921,409	80	$581
	Coal	328	$244,767	8	$746
	NaturalGas	7	$4,955	0	$708
	Kerosene	18	$8,358	0	$464
	Propane	303	$110,870	7	$366
	WoodOrOther	7	$5,255	0	$751
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	128	$84,401	3	$659
	1000 - 1999	15	$11,355	0	$757
	2000 - 2999	15	$9,741	0	$649
	3000 - 3999	17	$13,372	0	$787
	4000 - 4999	18	$13,254	0	$736
	5000 - 5999	22	$14,463	1	$657
	6000 - 6999	24	$13,656	1	$569
	7000 - 7999	25	$17,286	1	$691
	8000 - 8999	40	$23,359	1	$584
	9000 - 9999	45	$31,494	1	$700
	10000 - 10999	65	$35,174	2	$541
	11000 - 11999	256	$140,821	6	$550
	12000 - 12999	298	$158,436	7	$532
	13000 - 13999	130	$72,787	3	$560
	14000 - 14999	185	$101,373	4	$548
	15000 - 15999	165	$92,481	4	$560
	16000 - 16999	191	$107,899	5	$565
	17000 - 17999	206	$111,077	5	$539
	18000 - 18999	207	$112,241	5	$542
	19000 - 19999	206	$120,751	5	$586
	> 19999	1,880	$1,108,805	45	$590
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	4,141	$2,395,999		$579
	Reissue	1	$135		$135
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	1	$752		$752
TOTAL PMT		4,143	$2,396,886		$579
RECOUPMENTS		0	$0		$0
NET PAID			$2,396,886		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	348	$161,635	48	$464
	Renter	334	$165,860	46	$497
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	28	$10,507	4	$375
	Roomer	0	$0	0	$0
	Other	21	$6,726	3	$320
RACE	AmericanIndian	1	$758	0	$758
	Other	11	$5,403	2	$491
	NativeHawaiian	1	$808	0	$808
	Black	5	$2,953	1	$591
	White	706	$332,426	97	$471
	Asian	0	$0	0	$0
	Unknown	7	$2,380	1	$340
DISABLED	YES	140	$62,049	19	$443
	NO	591	$282,679	81	$478
AGE 60 & ABV	YES	390	$174,730	53	$448
	NO	341	$169,998	47	$499
AGE 5 & BLW	YES	154	$74,739	21	$485
	NO	577	$269,990	79	$468
PAY_TYPE	DIRECT	12	$6,078	2	$506
	PROVIDER	719	$338,651	98	$471
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.28

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	21	$17,249	3	$821
	FuelOil	522	$262,285	71	$502
	Coal	0	$0	0	$0
	NaturalGas	1	$1,000	0	$1,000
	Kerosene	2	$1,184	0	$592
	Propane	180	$60,040	25	$334
	WoodOrOther	5	$2,971	1	$594
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	15	$8,223	2	$548
	1000 - 1999	0	$0	0	$0
	2000 - 2999	1	$623	0	$623
	3000 - 3999	4	$2,826	1	$706
	4000 - 4999	1	$872	0	$872
	5000 - 5999	1	$1,000	0	$1,000
	6000 - 6999	3	$1,000	0	$333
	7000 - 7999	9	$3,596	1	$400
	8000 - 8999	9	$3,373	1	$375
	9000 - 9999	6	$3,429	1	$572
	10000 - 10999	15	$6,038	2	$403
	11000 - 11999	44	$16,850	6	$383
	12000 - 12999	52	$21,539	7	$414
	13000 - 13999	17	$8,732	2	$514
	14000 - 14999	29	$12,928	4	$446
	15000 - 15999	37	$15,359	5	$415
	16000 - 16999	27	$11,715	4	$434
	17000 - 17999	33	$17,417	5	$528
	18000 - 18999	43	$20,270	6	$471
	19000 - 19999	53	$23,576	7	$445
	> 19999	332	$165,363	45	$498
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	731	$344,728		$472
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		731	$344,728		$472
RECOUPMENTS		0	$0		$0
NET PAID			$344,728		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,296	$876,806	58	$677
	Renter	847	$534,253	38	$631
	RenterWithHeat	2	$1,230	0	$615
	SubsidizedWithHeat	3	$2,107	0	$702
	SubsidizedNoHeat	27	$14,558	1	$539
	Roomer	0	$0	0	$0
	Other	62	$41,192	3	$664
RACE	AmericanIndian	3	$1,997	0	$666
	Other	17	$14,036	1	$826
	NativeHawaiian	3	$2,291	0	$764
	Black	10	$6,322	0	$632
	White	2,193	$1,436,522	98	$655
	Asian	0	$0	0	$0
	Unknown	11	$8,978	0	$816
DISABLED	YES	567	$367,192	25	$648
	NO	1,670	$1,102,955	75	$660
AGE 60 & ABV	YES	1,211	$771,937	54	$637
	NO	1,026	$698,210	46	$681
AGE 5 & BLW	YES	307	$208,896	14	$680
	NO	1,930	$1,261,251	86	$653
PAY_TYPE	DIRECT	4	$1,778	0	$444
	PROVIDER	2,236	$1,469,239	100	$657
REFUNDS		4	$66		$16

AVERAGE HOUSEHOLD SIZE: 3.17

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	121	$60,476	5	$500
	FuelOil	1,586	$1,086,211	71	$685
	Coal	95	$81,114	4	$854
	NaturalGas	37	$18,579	2	$502
	Kerosene	102	$74,674	5	$732
	Propane	237	$104,934	11	$443
	WoodOrOther	40	$32,085	2	$802
	BlendedFuel	19	$12,074	1	$635
INCOME RANGE	0 - 999	82	$62,542	4	$763
	1000 - 1999	12	$6,749	1	$562
	2000 - 2999	9	$7,775	0	$864
	3000 - 3999	9	$6,462	0	$718
	4000 - 4999	12	$8,831	1	$736
	5000 - 5999	17	$12,866	1	$757
	6000 - 6999	19	$12,704	1	$669
	7000 - 7999	25	$18,618	1	$745
	8000 - 8999	20	$13,206	1	$660
	9000 - 9999	38	$27,198	2	$716
	10000 - 10999	53	$37,006	2	$698
	11000 - 11999	162	$98,416	7	$608
	12000 - 12999	198	$121,497	9	$614
	13000 - 13999	83	$53,073	4	$639
	14000 - 14999	83	$50,779	4	$612
	15000 - 15999	100	$61,939	4	$619
	16000 - 16999	98	$62,835	4	$641
	17000 - 17999	93	$61,305	4	$659
	18000 - 18999	109	$76,381	5	$701
	19000 - 19999	104	$67,795	5	$652
	> 19999	910	$601,170	41	$661
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	2,237	$1,470,147		$657
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	3	$871		$290
TOTAL PMT		2,240	$1,471,018		$657
RECOUPMENTS		0	$0		$0
NET PAID			$1,471,018		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	44	$28,359	44	$645
	Renter	53	$27,964	52	$528
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	1	$246	1	$246
	Roomer	0	$0	0	$0
	Other	3	$2,441	3	$814
RACE	AmericanIndian	0	$0	0	$0
	Other	1	$841	1	$841
	NativeHawaiian	0	$0	0	$0
	Black	0	$0	0	$0
	White	100	$58,169	99	$582
	Asian	0	$0	0	$0
	Unknown	0	$0	0	$0
DISABLED	YES	33	$17,459	33	$529
	NO	68	$41,551	67	$611
AGE 60 & ABV	YES	51	$29,414	50	$577
	NO	50	$29,596	50	$592
AGE 5 & BLW	YES	10	$6,966	10	$697
	NO	91	$52,044	90	$572
PAY_TYPE	DIRECT	0	$0	0	$0
	PROVIDER	101	$59,010	100	$584
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.07

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	7	$4,167	7	$595
	FuelOil	60	$35,332	59	$589
	Coal	0	$0	0	$0
	NaturalGas	0	$0	0	$0
	Kerosene	3	$2,000	3	$667
	Propane	22	$10,311	22	$469
	WoodOrOther	6	$5,200	6	$867
	BlendedFuel	3	$2,000	3	$667
INCOME RANGE	0 - 999	5	$3,199	5	$640
	1000 - 1999	0	$0	0	$0
	2000 - 2999	0	$0	0	$0
	3000 - 3999	0	$0	0	$0
	4000 - 4999	0	$0	0	$0
	5000 - 5999	0	$0	0	$0
	6000 - 6999	0	$0	0	$0
	7000 - 7999	0	$0	0	$0
	8000 - 8999	0	$0	0	$0
	9000 - 9999	2	$799	2	$400
	10000 - 10999	3	$1,998	3	$666
	11000 - 11999	7	$2,287	7	$327
	12000 - 12999	17	$11,467	17	$675
	13000 - 13999	1	$999	1	$999
	14000 - 14999	10	$5,132	10	$513
	15000 - 15999	4	$1,647	4	$412
	16000 - 16999	5	$1,787	5	$357
	17000 - 17999	3	$2,419	3	$806
	18000 - 18999	4	$2,391	4	$598
	19000 - 19999	1	$890	1	$890
	> 19999	39	$23,994	39	$615
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	101	$59,010		$584
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		101	$59,010		$584
RECOUPMENTS		0	$0		$0
NET PAID			$59,010		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	557	$289,488	54	$520
	Renter	434	$224,423	42	$517
	RenterWithHeat	1	$405	0	$405
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	14	$6,071	1	$434
	Roomer	0	$0	0	$0
	Other	27	$15,284	3	$566
RACE	AmericanIndian	4	$2,000	0	$500
	Other	19	$8,973	2	$472
	NativeHawaiian	2	$998	0	$499
	Black	4	$2,641	0	$660
	White	1,000	$518,391	97	$518
	Asian	0	$0	0	$0
	Unknown	4	$2,667	0	$667
DISABLED	YES	307	$155,633	30	$507
	NO	726	$380,037	70	$523
AGE 60 & ABV	YES	496	$250,863	48	$506
	NO	537	$284,807	52	$530
AGE 5 & BLW	YES	155	$86,433	15	$558
	NO	878	$449,237	85	$512
PAY_TYPE	DIRECT	4	$2,291	0	$573
	PROVIDER	1,029	$533,380	100	$518
REFUNDS		1	$376		$376

AVERAGE HOUSEHOLD SIZE: 3.63

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	39	$27,807	4	$713
	FuelOil	573	$314,080	55	$548
	Coal	4	$4,000	0	$1,000
	NaturalGas	1	$768	0	$768
	Kerosene	43	$25,484	4	$593
	Propane	317	$125,016	31	$394
	WoodOrOther	36	$27,404	3	$761
	BlendedFuel	20	$11,113	2	$556
INCOME RANGE	0 - 999	26	$16,673	3	$641
	1000 - 1999	1	$467	0	$467
	2000 - 2999	6	$3,143	1	$524
	3000 - 3999	8	$3,364	1	$420
	4000 - 4999	4	$2,067	0	$517
	5000 - 5999	5	$2,321	0	$464
	6000 - 6999	4	$2,496	0	$624
	7000 - 7999	4	$1,795	0	$449
	8000 - 8999	9	$5,471	1	$608
	9000 - 9999	10	$6,797	1	$680
	10000 - 10999	24	$10,484	2	$437
	11000 - 11999	64	$33,231	6	$519
	12000 - 12999	64	$31,694	6	$495
	13000 - 13999	43	$22,324	4	$519
	14000 - 14999	43	$19,456	4	$452
	15000 - 15999	35	$16,178	3	$462
	16000 - 16999	52	$26,424	5	$508
	17000 - 17999	39	$21,225	4	$544
	18000 - 18999	62	$31,085	6	$501
	19000 - 19999	48	$23,306	5	$486
	> 19999	482	$255,670	47	$530
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,033	$535,670		$519
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,033	$535,670		$519
RECOUPMENTS		0	$0		$0
NET PAID			$535,670		

Energy Assistance Summary (EASUM)

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Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	148	$94,364	53	$638
	Renter	118	$67,712	42	$574
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	4	$1,330	1	$332
	Roomer	0	$0	0	$0
	Other	11	$7,662	4	$697
RACE	AmericanIndian	2	$1,426	1	$713
	Other	0	$0	0	$0
	NativeHawaiian	0	$0	0	$0
	Black	3	$1,278	1	$426
	White	271	$166,262	96	$614
	Asian	0	$0	0	$0
	Unknown	5	$2,101	2	$420
DISABLED	YES	94	$51,243	33	$545
	NO	187	$119,825	67	$641
AGE 60 & ABV	YES	119	$73,331	42	$616
	NO	162	$97,737	58	$603
AGE 5 & BLW	YES	42	$31,397	15	$748
	NO	239	$139,670	85	$584
PAY_TYPE	DIRECT	9	$3,073	3	$341
	PROVIDER	272	$167,995	97	$618
REFUNDS		3	$293		$98

AVERAGE HOUSEHOLD SIZE: 3.57

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	105	$58,929	37	$561
	FuelOil	33	$21,162	12	$641
	Coal	22	$19,991	8	$909
	NaturalGas	20	$13,547	7	$677
	Kerosene	0	$0	0	$0
	Propane	73	$33,096	26	$453
	WoodOrOther	27	$23,768	10	$880
	BlendedFuel	1	$575	0	$575
INCOME RANGE	0 - 999	15	$8,371	5	$558
	1000 - 1999	3	$1,501	1	$500
	2000 - 2999	0	$0	0	$0
	3000 - 3999	0	$0	0	$0
	4000 - 4999	1	$1,000	0	$1,000
	5000 - 5999	0	$0	0	$0
	6000 - 6999	4	$1,872	1	$468
	7000 - 7999	4	$1,677	1	$419
	8000 - 8999	11	$5,011	4	$456
	9000 - 9999	8	$4,205	3	$526
	10000 - 10999	3	$1,904	1	$635
	11000 - 11999	17	$11,013	6	$648
	12000 - 12999	17	$7,238	6	$426
	13000 - 13999	10	$6,718	4	$672
	14000 - 14999	14	$7,748	5	$553
	15000 - 15999	5	$2,684	2	$537
	16000 - 16999	13	$8,164	5	$628
	17000 - 17999	19	$11,098	7	$584
	18000 - 18999	10	$5,088	4	$509
	19000 - 19999	10	$9,041	4	$904
	> 19999	117	$76,732	42	$656
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	281	$171,067		$609
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		281	$171,067		$609
RECOUPMENTS		0	$0		$0
NET PAID			$171,067		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 60

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	241	$120,468	44	$500
	Renter	226	$115,750	42	$512
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	4	$2,368	1	$592
	SubsidizedNoHeat	60	$29,545	11	$492
	Roomer	0	$0	0	$0
	Other	11	$4,713	2	$428
RACE	AmericanIndian	4	$1,761	1	$440
	Other	11	$5,296	2	$481
	NativeHawaiian	3	$887	1	$296
	Black	27	$16,140	5	$598
	White	491	$245,300	91	$500
	Asian	0	$0	0	$0
	Unknown	6	$3,461	1	$577
DISABLED	YES	116	$58,997	21	$509
	NO	426	$213,848	79	$502
AGE 60 & ABV	YES	295	$139,987	54	$475
	NO	247	$132,858	46	$538
AGE 5 & BLW	YES	70	$38,421	13	$549
	NO	472	$234,423	87	$497
PAY_TYPE	DIRECT	1	$287	0	$287
	PROVIDER	541	$272,558	100	$504
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 2.79

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	77	$51,877	14	$674
	FuelOil	362	$179,213	67	$495
	Coal	2	$1,983	0	$992
	NaturalGas	0	$0	0	$0
	Kerosene	1	$633	0	$633
	Propane	97	$37,146	18	$383
	WoodOrOther	3	$1,992	1	$664
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	13	$7,164	2	$551
	1000 - 1999	2	$911	0	$456
	2000 - 2999	2	$1,046	0	$523
	3000 - 3999	1	$983	0	$983
	4000 - 4999	2	$2,000	0	$1,000
	5000 - 5999	4	$1,759	1	$440
	6000 - 6999	5	$3,001	1	$600
	7000 - 7999	2	$1,000	0	$500
	8000 - 8999	2	$1,000	0	$500
	9000 - 9999	5	$4,253	1	$851
	10000 - 10999	3	$880	1	$293
	11000 - 11999	21	$10,493	4	$500
	12000 - 12999	43	$15,660	8	$364
	13000 - 13999	21	$9,365	4	$446
	14000 - 14999	41	$20,005	8	$488
	15000 - 15999	25	$12,737	5	$509
	16000 - 16999	33	$15,943	6	$483
	17000 - 17999	37	$17,595	7	$476
	18000 - 18999	24	$10,647	4	$444
	19000 - 19999	26	$12,831	5	$494
	> 19999	230	$123,571	42	$537
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	542	$272,844		$503
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		542	$272,844		$503
RECOUPMENTS		0	$0		$0
NET PAID			$272,844		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 61

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	335	$174,679	61	$521
	Renter	175	$98,446	32	$563
	RenterWithHeat	1	$778	0	$778
	SubsidizedWithHeat	4	$1,499	1	$375
	SubsidizedNoHeat	27	$8,781	5	$325
	Roomer	0	$0	0	$0
	Other	11	$6,442	2	$586
RACE	AmericanIndian	6	$2,953	1	$492
	Other	4	$1,192	1	$298
	NativeHawaiian	0	$0	0	$0
	Black	7	$2,810	1	$401
	White	531	$281,561	96	$530
	Asian	0	$0	0	$0
	Unknown	5	$2,109	1	$422
DISABLED	YES	172	$86,480	31	$503
	NO	381	$204,145	69	$536
AGE 60 & ABV	YES	253	$131,593	46	$520
	NO	300	$159,032	54	$530
AGE 5 & BLW	YES	69	$39,306	12	$570
	NO	484	$251,319	88	$519
PAY_TYPE	DIRECT	7	$4,691	1	$670
	PROVIDER	546	$285,933	99	$524
REFUNDS		4	$976		$244

AVERAGE HOUSEHOLD SIZE: 3.51

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	190	$92,923	34	$489
	FuelOil	68	$39,514	12	$581
	Coal	5	$4,976	1	$995
	NaturalGas	83	$36,145	15	$435
	Kerosene	2	$1,960	0	$980
	Propane	161	$86,669	29	$538
	WoodOrOther	42	$26,810	8	$638
	BlendedFuel	2	$1,629	0	$814
INCOME RANGE	0 - 999	38	$21,561	7	$567
	1000 - 1999	5	$2,601	1	$520
	2000 - 2999	0	$0	0	$0
	3000 - 3999	2	$1,000	0	$500
	4000 - 4999	4	$1,952	1	$488
	5000 - 5999	6	$3,824	1	$637
	6000 - 6999	3	$1,863	1	$621
	7000 - 7999	8	$4,037	1	$505
	8000 - 8999	2	$1,313	0	$656
	9000 - 9999	6	$3,394	1	$566
	10000 - 10999	11	$4,626	2	$421
	11000 - 11999	37	$18,324	7	$495
	12000 - 12999	33	$16,112	6	$488
	13000 - 13999	16	$8,255	3	$516
	14000 - 14999	25	$11,448	5	$458
	15000 - 15999	21	$12,014	4	$572
	16000 - 16999	20	$8,448	4	$422
	17000 - 17999	14	$7,852	3	$561
	18000 - 18999	33	$13,940	6	$422
	19000 - 19999	20	$10,883	4	$544
	> 19999	249	$137,175	45	$551
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	553	$290,625		$526
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		553	$290,625		$526
RECOUPMENTS		0	$0		$0
NET PAID			$290,625		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 62

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	195	$106,710	57	$547
	Renter	135	$69,189	40	$513
	RenterWithHeat	1	$137	0	$137
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	1	$219	0	$219
	Roomer	0	$0	0	$0
	Other	9	$3,671	3	$408
RACE	AmericanIndian	1	$850	0	$850
	Other	4	$1,920	1	$480
	NativeHawaiian	0	$0	0	$0
	Black	4	$2,282	1	$570
	White	331	$173,874	97	$525
	Asian	0	$0	0	$0
	Unknown	1	$1,000	0	$1,000
DISABLED	YES	119	$59,217	35	$498
	NO	222	$120,709	65	$544
AGE 60 & ABV	YES	181	$93,558	53	$517
	NO	160	$86,367	47	$540
AGE 5 & BLW	YES	43	$22,202	13	$516
	NO	298	$157,724	87	$529
PAY_TYPE	DIRECT	2	$605	1	$302
	PROVIDER	339	$179,320	99	$529
REFUNDS		2	$294		$147

AVERAGE HOUSEHOLD SIZE: 3.18

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	68	$39,830	20	$586
	FuelOil	8	$5,131	2	$641
	Coal	0	$0	0	$0
	NaturalGas	50	$22,782	15	$456
	Kerosene	1	$1,000	0	$1,000
	Propane	171	$89,854	50	$525
	WoodOrOther	43	$21,329	13	$496
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	13	$7,389	4	$568
	1000 - 1999	0	$0	0	$0
	2000 - 2999	1	$835	0	$835
	3000 - 3999	3	$1,738	1	$579
	4000 - 4999	1	$1,000	0	$1,000
	5000 - 5999	1	$928	0	$928
	6000 - 6999	2	$961	1	$480
	7000 - 7999	2	$657	1	$328
	8000 - 8999	7	$5,893	2	$842
	9000 - 9999	5	$2,902	1	$580
	10000 - 10999	5	$3,543	1	$709
	11000 - 11999	22	$10,670	6	$485
	12000 - 12999	40	$17,905	12	$448
	13000 - 13999	6	$4,706	2	$784
	14000 - 14999	14	$7,585	4	$542
	15000 - 15999	20	$9,429	6	$471
	16000 - 16999	13	$6,007	4	$462
	17000 - 17999	16	$8,707	5	$544
	18000 - 18999	15	$7,737	4	$516
	19000 - 19999	16	$8,858	5	$554
	> 19999	139	$72,477	41	$521
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	341	$179,926		$528
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		341	$179,926		$528
RECOUPMENTS		0	$0		$0
NET PAID			$179,926		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 63

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	610	$369,232	50	$605
	Renter	524	$301,785	43	$576
	RenterWithHeat	1	$1,000	0	$1,000
	SubsidizedWithHeat	3	$1,698	0	$566
	SubsidizedNoHeat	54	$23,944	4	$443
	Roomer	0	$0	0	$0
	Other	33	$18,792	3	$569
RACE	AmericanIndian	4	$1,999	0	$500
	Other	11	$5,346	1	$486
	NativeHawaiian	0	$0	0	$0
	Black	112	$55,309	9	$494
	White	1,082	$644,927	88	$596
	Asian	3	$1,135	0	$378
	Unknown	13	$7,735	1	$595
DISABLED	YES	357	$202,458	29	$567
	NO	868	$513,993	71	$592
AGE 60 & ABV	YES	548	$315,022	45	$575
	NO	677	$401,429	55	$593
AGE 5 & BLW	YES	178	$107,272	15	$603
	NO	1,047	$609,179	85	$582
PAY_TYPE	DIRECT	2	$1,722	0	$861
	PROVIDER	1,223	$714,729	100	$584
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.28

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	319	$174,439	26	$547
	FuelOil	456	$302,494	37	$663
	Coal	0	$0	0	$0
	NaturalGas	262	$118,365	21	$452
	Kerosene	91	$69,078	7	$759
	Propane	87	$43,825	7	$504
	WoodOrOther	8	$7,113	1	$889
	BlendedFuel	2	$1,137	0	$568
INCOME RANGE	0 - 999	82	$44,980	7	$549
	1000 - 1999	14	$7,061	1	$504
	2000 - 2999	3	$1,207	0	$402
	3000 - 3999	6	$4,416	0	$736
	4000 - 4999	8	$4,561	1	$570
	5000 - 5999	10	$6,780	1	$678
	6000 - 6999	14	$7,455	1	$532
	7000 - 7999	11	$6,001	1	$546
	8000 - 8999	11	$7,418	1	$674
	9000 - 9999	18	$10,644	1	$591
	10000 - 10999	21	$11,665	2	$555
	11000 - 11999	92	$54,557	8	$593
	12000 - 12999	112	$56,491	9	$504
	13000 - 13999	39	$22,421	3	$575
	14000 - 14999	47	$32,470	4	$691
	15000 - 15999	46	$25,268	4	$549
	16000 - 16999	42	$27,201	3	$648
	17000 - 17999	49	$24,517	4	$500
	18000 - 18999	45	$27,560	4	$612
	19000 - 19999	51	$29,581	4	$580
	> 19999	503	$303,197	41	$603
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,225	$716,451		$585
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		1,225	$716,451		$585
RECOUPMENTS		0	$0		$0
NET PAID			$716,451		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 64

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	539	$290,065	57	$538
	Renter	363	$174,562	39	$481
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	1	$41	0	$41
	SubsidizedNoHeat	17	$9,948	2	$585
	Roomer	0	$0	0	$0
	Other	21	$11,224	2	$534
RACE	AmericanIndian	2	$1,934	0	$967
	Other	17	$8,582	2	$505
	NativeHawaiian	3	$2,000	0	$667
	Black	9	$4,815	1	$535
	White	899	$461,580	96	$513
	Asian	3	$2,000	0	$667
	Unknown	8	$4,928	1	$616
DISABLED	YES	250	$125,291	27	$501
	NO	691	$360,549	73	$522
AGE 60 & ABV	YES	543	$281,585	58	$519
	NO	398	$204,255	42	$513
AGE 5 & BLW	YES	118	$56,626	13	$480
	NO	823	$429,214	87	$522
PAY_TYPE	DIRECT	2	$1,473	0	$736
	PROVIDER	939	$484,367	100	$516
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 2.86

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	43	$25,920	5	$603
	FuelOil	469	$273,762	50	$584
	Coal	4	$4,000	0	$1,000
	NaturalGas	2	$2,000	0	$1,000
	Kerosene	30	$18,081	3	$603
	Propane	350	$129,104	37	$369
	WoodOrOther	18	$16,590	2	$922
	BlendedFuel	25	$16,382	3	$655
INCOME RANGE	0 - 999	17	$11,568	2	$680
	1000 - 1999	1	$614	0	$614
	2000 - 2999	2	$813	0	$406
	3000 - 3999	3	$1,500	0	$500
	4000 - 4999	7	$4,352	1	$622
	5000 - 5999	2	$1,090	0	$545
	6000 - 6999	6	$3,743	1	$624
	7000 - 7999	6	$3,319	1	$553
	8000 - 8999	8	$4,280	1	$535
	9000 - 9999	17	$7,142	2	$420
	10000 - 10999	16	$7,888	2	$493
	11000 - 11999	65	$32,531	7	$500
	12000 - 12999	72	$36,290	8	$504
	13000 - 13999	39	$23,847	4	$611
	14000 - 14999	33	$20,197	4	$612
	15000 - 15999	56	$24,027	6	$429
	16000 - 16999	44	$24,033	5	$546
	17000 - 17999	69	$32,183	7	$466
	18000 - 18999	47	$22,445	5	$478
	19000 - 19999	59	$31,225	6	$529
	> 19999	372	$192,750	40	$518
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	941	$485,840		$516
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		941	$485,840		$516
RECOUPMENTS		0	$0		$0
NET PAID			$485,840		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 65

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	1,591	$1,049,896	52	$660
	Renter	1,279	$775,860	42	$607
	RenterWithHeat	5	$1,543	0	$309
	SubsidizedWithHeat	5	$2,892	0	$578
	SubsidizedNoHeat	107	$50,057	3	$468
	Roomer	0	$0	0	$0
	Other	76	$49,726	2	$654
RACE	AmericanIndian	8	$5,473	0	$684
	Other	44	$24,621	1	$560
	NativeHawaiian	3	$2,838	0	$946
	Black	140	$73,655	5	$526
	White	2,834	$1,800,224	93	$635
	Asian	2	$982	0	$491
	Unknown	32	$22,183	1	$693
DISABLED	YES	815	$486,305	27	$597
	NO	2,248	$1,443,669	73	$642
AGE 60 & ABV	YES	1,503	$959,496	49	$638
	NO	1,560	$970,479	51	$622
AGE 5 & BLW	YES	394	$251,937	13	$639
	NO	2,669	$1,678,037	87	$629
PAY_TYPE	DIRECT	0	$0	0	$0
	PROVIDER	3,065	$1,930,334	100	$630
REFUNDS		5	$1,129		$226

AVERAGE HOUSEHOLD SIZE: 3.12

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	517	$284,818	17	$551
	FuelOil	1,505	$1,093,261	49	$726
	Coal	4	$3,949	0	$987
	NaturalGas	326	$157,162	11	$482
	Kerosene	244	$173,633	8	$712
	Propane	416	$177,552	14	$427
	WoodOrOther	33	$26,583	1	$806
	BlendedFuel	18	$13,016	1	$723
INCOME RANGE	0 - 999	135	$87,181	4	$646
	1000 - 1999	11	$6,969	0	$634
	2000 - 2999	14	$9,747	0	$696
	3000 - 3999	20	$11,662	1	$583
	4000 - 4999	10	$6,827	0	$683
	5000 - 5999	22	$12,692	1	$577
	6000 - 6999	14	$9,247	0	$660
	7000 - 7999	24	$16,716	1	$696
	8000 - 8999	28	$17,953	1	$641
	9000 - 9999	45	$28,518	1	$634
	10000 - 10999	60	$37,907	2	$632
	11000 - 11999	250	$147,871	8	$591
	12000 - 12999	260	$160,323	8	$617
	13000 - 13999	120	$74,713	4	$623
	14000 - 14999	151	$92,339	5	$612
	15000 - 15999	130	$78,850	4	$607
	16000 - 16999	131	$76,909	4	$587
	17000 - 17999	125	$83,240	4	$666
	18000 - 18999	135	$82,093	4	$608
	19000 - 19999	155	$96,516	5	$623
	> 19999	1,221	$790,705	40	$648
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	3,063	$1,929,975		$630
	Reissue	0	$0		$0
	Secondpay	1	$0		$0
	Underpay	0	$0		$0
	Extraordinary	1	$359		$359
TOTAL PMT		3,065	$1,930,334		$630
RECOUPMENTS		0	$0		$0
NET PAID			$1,930,334		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 66

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	296	$163,128	49	$551
	Renter	254	$125,568	42	$494
	RenterWithHeat	0	$0	0	$0
	SubsidizedWithHeat	0	$0	0	$0
	SubsidizedNoHeat	47	$23,389	8	$498
	Roomer	0	$0	0	$0
	Other	10	$6,902	2	$690
RACE	AmericanIndian	1	$314	0	$314
	Other	8	$3,903	1	$488
	NativeHawaiian	0	$0	0	$0
	Black	3	$2,148	0	$716
	White	591	$310,623	97	$526
	Asian	0	$0	0	$0
	Unknown	4	$1,999	1	$500
DISABLED	YES	187	$97,853	31	$523
	NO	420	$221,134	69	$527
AGE 60 & ABV	YES	282	$151,403	46	$537
	NO	325	$167,584	54	$516
AGE 5 & BLW	YES	100	$52,578	16	$526
	NO	507	$266,409	84	$525
PAY_TYPE	DIRECT	5	$1,354	1	$271
	PROVIDER	602	$317,633	99	$528
REFUNDS		1	$50		$50

AVERAGE HOUSEHOLD SIZE: 3.15

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	41	$27,683	7	$675
	FuelOil	288	$165,716	47	$575
	Coal	3	$3,000	0	$1,000
	NaturalGas	1	$813	0	$813
	Kerosene	25	$15,107	4	$604
	Propane	217	$88,295	36	$407
	WoodOrOther	14	$8,523	2	$609
	BlendedFuel	18	$9,850	3	$547
INCOME RANGE	0 - 999	7	$3,985	1	$569
	1000 - 1999	1	$724	0	$724
	2000 - 2999	4	$3,014	1	$754
	3000 - 3999	5	$2,210	1	$442
	4000 - 4999	4	$2,340	1	$585
	5000 - 5999	1	$619	0	$619
	6000 - 6999	4	$2,817	1	$704
	7000 - 7999	5	$2,799	1	$560
	8000 - 8999	7	$2,947	1	$421
	9000 - 9999	4	$3,051	1	$763
	10000 - 10999	6	$5,090	1	$848
	11000 - 11999	47	$26,166	8	$557
	12000 - 12999	60	$27,808	10	$463
	13000 - 13999	17	$8,809	3	$518
	14000 - 14999	22	$10,818	4	$492
	15000 - 15999	27	$14,170	4	$525
	16000 - 16999	28	$13,850	5	$495
	17000 - 17999	24	$10,823	4	$451
	18000 - 18999	43	$21,571	7	$502
	19000 - 19999	20	$10,127	3	$506
	> 19999	271	$145,250	45	$536
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	607	$318,987		$526
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	0	$0		$0
TOTAL PMT		607	$318,987		$526
RECOUPMENTS		0	$0		$0
NET PAID			$318,987		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

County 67

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	731	$380,765	42	$521
	Renter	928	$463,861	53	$500
	RenterWithHeat	7	$3,611	0	$516
	SubsidizedWithHeat	2	$421	0	$210
	SubsidizedNoHeat	39	$19,309	2	$495
	Roomer	0	$0	0	$0
	Other	31	$17,356	2	$560
RACE	AmericanIndian	10	$5,179	1	$518
	Other	190	$98,701	11	$519
	NativeHawaiian	3	$1,203	0	$401
	Black	185	$94,315	11	$510
	White	1,294	$657,555	74	$508
	Asian	4	$2,257	0	$564
	Unknown	52	$26,113	3	$502
DISABLED	YES	473	$226,041	27	$478
	NO	1,265	$659,283	73	$521
AGE 60 & ABV	YES	743	$358,176	43	$482
	NO	995	$527,147	57	$530
AGE 5 & BLW	YES	327	$178,319	19	$545
	NO	1,411	$707,005	81	$501
PAY_TYPE	DIRECT	6	$4,564	0	$761
	PROVIDER	1,733	$880,870	100	$508
REFUNDS		0	$0		$0

AVERAGE HOUSEHOLD SIZE: 3.58

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	362	$201,771	21	$557
	FuelOil	600	$344,006	35	$573
	Coal	3	$2,632	0	$877
	NaturalGas	280	$131,543	16	$470
	Kerosene	15	$9,542	1	$636
	Propane	465	$184,488	27	$397
	WoodOrOther	13	$11,344	1	$873
	BlendedFuel	0	$0	0	$0
INCOME RANGE	0 - 999	40	$22,666	2	$567
	1000 - 1999	2	$1,000	0	$500
	2000 - 2999	1	$1,000	0	$1,000
	3000 - 3999	8	$4,063	0	$508
	4000 - 4999	5	$3,434	0	$687
	5000 - 5999	8	$6,197	0	$775
	6000 - 6999	10	$6,318	1	$632
	7000 - 7999	8	$5,437	0	$680
	8000 - 8999	18	$8,043	1	$447
	9000 - 9999	17	$7,775	1	$457
	10000 - 10999	38	$18,252	2	$480
	11000 - 11999	83	$40,137	5	$484
	12000 - 12999	124	$52,063	7	$420
	13000 - 13999	67	$32,671	4	$488
	14000 - 14999	90	$40,046	5	$445
	15000 - 15999	69	$37,280	4	$540
	16000 - 16999	71	$35,665	4	$502
	17000 - 17999	76	$37,294	4	$491
	18000 - 18999	60	$31,071	3	$518
	19000 - 19999	69	$32,214	4	$467
	> 19999	869	$460,374	50	$530
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	1,738	$885,324		$509
	Reissue	0	$0		$0
	Secondpay	0	$0		$0
	Underpay	0	$0		$0
	Extraordinary	1	$110		$110
TOTAL PMT		1,739	$885,434		$509
RECOUPMENTS		2	$922		$461
NET PAID			$884,512		

Energy Assistance Summary (EASUM)

8/23/2025 - 4/9/2026

STATE WIDE

Crisis Demographic Report By Household (LIH660-R03)

	ITEM	COUNT	AMOUNT	%	AVG
HOUSING	Owner	45,702	$25,590,649	51	$560
	Renter	37,891	$21,063,186	42	$556
	RenterWithHeat	169	$89,256	0	$528
	SubsidizedWithHeat	135	$58,723	0	$435
	SubsidizedNoHeat	4,297	$2,315,673	5	$539
	Roomer	2	$1,709	0	$854
	Other	1,970	$1,108,369	2	$563
RACE	AmericanIndian	229	$128,706	0	$562
	Other	4,978	$2,854,009	6	$573
	NativeHawaiian	119	$68,047	0	$572
	Black	11,989	$6,829,447	13	$570
	White	71,225	$39,428,799	79	$554
	Asian	365	$199,973	0	$548
	Unknown	1,261	$718,584	1	$570
DISABLED	YES	25,759	$13,789,203	29	$535
	NO	64,407	$36,438,363	71	$566
AGE 60 & ABV	YES	43,061	$22,968,955	48	$533
	NO	47,105	$27,258,611	52	$579
AGE 5 & BLW	YES	13,761	$8,167,399	15	$594
	NO	76,405	$42,060,166	85	$550
PAY_TYPE	DIRECT	363	$149,600	0	$412
	PROVIDER	89,850	$50,093,014	100	$558
REFUNDS		170	$32,345		$190

AVERAGE HOUSEHOLD SIZE: 3.32

* Counts, Amounts ($), % and AVG from HOUSING, RACE, DISABLED, OVER-60 and INCOME RANGE category are from Regular payments only

** Counts, Amounts ($), % and AVG from PAY_TYPE category are from All Payment Types (Regular, Reissue, Secondpay, Underpay and Extraordinary)

*** Counts, Amounts ($), % and AVG from PAYMENT_SENT category are from All Payment Types (Regular, Reissue, Secondpay, Underpay and Extraordinary)

	ITEM	COUNT	AMOUNT	%	AVG
PAYMENT SENT	Electric	13,003	$7,549,553	14	$581
	FuelOil	49,869	$28,625,993	55	$574
	Coal	1,062	$861,914	1	$812
	NaturalGas	9,802	$5,377,325	11	$549
	Kerosene	2,049	$1,312,057	2	$640
	Propane	12,607	$5,267,928	14	$418
	WoodOrOther	1,123	$860,034	1	$766
	BlendedFuel	651	$372,762	1	$573
INCOME RANGE	0 - 999	3,146	$1,998,856	3	$635
	1000 - 1999	327	$191,631	0	$586
	2000 - 2999	393	$238,745	0	$607
	3000 - 3999	462	$282,490	1	$611
	4000 - 4999	478	$299,924	1	$627
	5000 - 5999	448	$281,313	0	$628
	6000 - 6999	613	$362,110	1	$591
	7000 - 7999	685	$413,229	1	$603
	8000 - 8999	833	$474,689	1	$570
	9000 - 9999	1,103	$639,558	1	$580
	10000 - 10999	1,601	$884,514	2	$552
	11000 - 11999	6,239	$3,284,631	7	$526
	12000 - 12999	7,099	$3,703,226	8	$522
	13000 - 13999	3,200	$1,728,302	4	$540
	14000 - 14999	3,791	$2,003,619	4	$529
	15000 - 15999	3,598	$1,930,135	4	$536
	16000 - 16999	3,822	$2,057,101	4	$538
	17000 - 17999	3,968	$2,123,493	4	$535
	18000 - 18999	4,201	$2,252,016	5	$536
	19000 - 19999	4,199	$2,261,067	5	$538
	> 19999	39,911	$22,790,140	44	$571
	Not Reported	0	$0	0	$0
PAYMENT TYPE	Regular	90,166	$50,227,566		$557
	Reissue	12	$5,968		$497
	Secondpay	3	$377		$126
	Underpay	0	$0		$0
	Extraordinary	32	$8,703		$272
TOTAL PMT		90,213	$50,242,614		$557
RECOUPMENTS		5	$1,439		$288
NET PAID			$50,241,175		

#	Statement of Policy	Company's Response (Exhibit JDT-3)	CAUSE-PA Response
1	How the ratemaking mechanism and rate design align revenues with cost causation principles as to both fixed and variable costs.	National Fuel Gas's WNA is designed to recover distribution revenues needed to satisfy the cost-of-service requirement determined in this proceeding, while mitigating the variance between actual and projected distribution revenues due to weather. The Company recovers a significant portion of fixed costs through volumetric rates. These fixed costs do not vary with the amount of gas delivered to customers and are composed of fixed operation and maintenance expenses, administrative and general expenses, depreciation, certain taxes, a portion of working capital requirements, and return on investment. These costs also do not vary in the short-term with changes in temperature. In the absence of a rate design that affords the Company the opportunity to recover all fixed costs in a fixed monthly charge, the WNA mechanism better aligns distribution revenues with cost causation principles.	The WNA distorts the connection because it is premised on the concept that although NFG is a weather responsive distribution business, customers should pay for the gas that they do not use, rather than what they use, undercuts established policy and programs to promote low income conservation and efficiency, and allows what is essentially guaranteed rate recovery regardless of the company's effectiveness at efficient management.

#	Statement of Policy	Company's Response (Exhibit JDT-3)	CAUSE-PA Response
2	How the ratemaking mechanism and rate design impact the fixed utility's capacity utilization.	The WNA mechanism indirectly supports efficient capacity utilization by stabilizing the recovery of fixed distribution costs, which are incurred to maintain National Fuel Gas's infrastructure and capacity to serve customers regardless of fluctuations in gas usage. Since these fixed costs do not change with short-term usage variations, the WNA ensures that the Company can continue investing in the infrastructure necessary to meet peak demand and long-term capacity needs and be compensated for these investments. By supporting revenue stability, the WNA reduces under-recovery risks during periods of lower gas usage, ensuring that the revenues collected align with customers' continued reliance on the utility's fixed assets that provide peak service.	The connection between the WNA support of fixed capacity utilization is distorted in that although capacity is based on maximum usage during cold weather months, it credits customer bills for greater usage during those months when the weather is colder than normal and reduces customers' bills during warmer months -- thus providing customers with a credit when they use more of the system's capacity.

#	Statement of Policy	Company's Response (Exhibit JDT-3)	CAUSE-PA Response
3	Whether the ratemaking mechanism and rate design reflect the level of demand associated with the customer's anticipated c onsumption levels.	Customer specific usage factors corresponding to their individual demand is continually updated through the WNA formula and reflects the level of demand associated with the customer's anticipated consumption levels. In this proceeding, the Company is also proposing to set Normal Heating Degree Days using a 10-year average rather than a 15-year average, which more accurately captures recent warming trends. Using a more current weather baseline ensures that the WNA formula better aligns normalized usage with customers' anticipated consumption levels under today's climate conditions.	The WNA does not reflect the level of demand that is associated with customers' anticipated usage since it distorts the relationship by generating revenue when consumption is less than projected – and therefore demand is less than anticipated. Further, by essentially guaranteeing NFG a recovery of its authorized revenue requirement, the WNA provides revenue despite projections of revenue loss based on weather.

#	Statement of Policy	Company's Response (Exhibit JDT-3)	CAUSE-PA Response
4	How the ratemaking mechanism and rate design limit or eliminate interclass and intraclass cost shifting.	National Fuel Gas's WNA is applied on a customer-specific basis and is designed to be revenue-neutral within each customer class, such that it does not create or exacerbate cross-subsidization either within or across classes.	The WNA will not likely lead to interclass or intraclass cost shifting.

#	Statement of Policy	Company's Response (Exhibit JDT-3)	CAUSE-PA Response
5	How the ratemaking mechanism and rate design limit or eliminate disincentives for the promotion of efficiency programs.	The Company's WNA only addresses variations due to weather and does not affect customers' ability to pursue energy efficiency measures. Further, the Company continues and will continue to promote the use of energy efficiency measures to its customers as the WNA removes the financial disincentive for National Fuel Gas to promote energy efficiency.	The WNA does not incent energy efficiency. Instead, it reduces incentives for customers to engage in efficiency or utilize consumption reduction measures. The WNA reduces the effectiveness of LIURP in reducing bills as well as the ability of non-LIURP-participating low income customers to reduce bills through conservation.

#	Statement of Policy	Company's Response (Exhibit JDT-3)	CAUSE-PA Response
6	How the ratemaking mechanism and rate design impact customer incentives to employ efficiency measures and distributed energy resources.	Customers retain strong incentives to reduce usage because the commodity and other charges remain volumetric. The proposed WNA does not eliminate these price signals, so lower usage still results in lower bills.	As noted in 5, The WNA does not incent energy efficiency. Further, by reducing the potential savings due to energy efficiency on distribution, the WNA reduces the incentive for the application of efficiency measures.
7	How the ratemaking mechanism and rate design impact low-income customers and support consumer assistance progr ams.	Under the proposed WNA mechanism, customers who are currently enrolled to pay their bills based on a percentage of their household income see little to no impact to their bills under the WNA mechanism.	As noted in detail in my direct testimony, low income customers are disproportionally affected, as compared to the general NFG residential population, by their inability to afford current NFG rates, let alone an increase in rates. Customers who are on the average bill will see an increase in their CAP bills as a result of WNA charges assessed when the weather is warmer than normal. By creating greater unaffordability, the WNA destabilizes a household's bill paying ability. Although CAP customers who pay a PIP amount will not see an increase in their bills, the costs of the CAP program will increase because of the WNA and that general residential customer increase, also borne by a significant number of non-CAP low income customers, is destabilizing.

#	Statement of Policy	Company's Response (Exhibit JDT-3)	CAUSE-PA Response
8	How the ratemaking mechanism and rate design impact customer rate stability principles.	The American Gas Association Gas Rate Fundamentals book (Pages 152 – 156) states: "The goal of stability recognizes historical relationships among customers in terms of the proportion of system costs each customer group bears. Stability leads to a policy of gradualism in rate changes if substantial increases (or decreases) are called for in the context of a single rate case. Changes in gas utility pricing policy should be imposed gradually so that customers can adjust and any adverse impacts on the customers' operation are minimized." The WNA mechanism provides customers with more stable annual bills and directly mitigates volatility in their monthly costs. Customers would pay for the costs assigned to the volumetric base rate in the most recent rate case and customers would not pay more or less than that amount solely because the actual weather for the month the customers are billed is different than the weather used to determine the rate design of the volumetric base rate.	As noted in Number 7 and in my direct testimony, low income customers cannot afford current rates, nor the increases that will occur under proposed rates. Unaffordability of rates is destabilizing to these households and there is no benefit for these households from a hypothetical concept of bill stability. Further, NFG is not guaranteed to receive its authorized rate of return. The WNA, although providing stability to NFG by assuring that it receives that level of return, provides the Company a level of security not shared by its low income customers, who experience involuntarily service termination disproportionally.

#	Statement of Policy	Company's Response (Exhibit JDT-3)	CAUSE-PA Response
9	How weather impacts utility revenue under the ratemaking mechanism and rate design.	The Company's WNA adjusts customers' bills due to variations from normal weather during the heating season months (October through May), and it only mitigates the revenue effect of weather on the original rate design of the volumetric base rate. Without it, the Company is deprived of the opportunity to recover the Commission approved distribution revenue requirement for the applicable classes during times when warmer than normal weather occurs. Moreover, the absence of a WNA places the Company in a position of receiving a higher amount of revenues from customers when the weather is colder than normal. The WNA avoids both scenarios by minimizing the impact of weather on the Company's revenues and customers' bills.	WNA shifts weather-related risk from the Company to its customers. This is unacceptable. NFG is is not guaranteed to receive its authorized rate of return and is far better able to bear the risk of under recovery than are its low income customers. Further, NFG is made whole when the weather is warmer than the historical average. The credits from months in which NFG provides credits do not match the increase in revenue NFG receives in warmer than normalized months.
10	How the ratemaking mechanism and rate design impact the frequency of rate case filings and affect regulatory lag.	The WNA does not impact the Company's rate case frequency nor it effects regulatory lag.	I agree.

#	Statement of Policy	Company's Response (Exhibit JDT-3)	CAUSE-PA Response
11	If or how the ratemaking mechanism and rate design interact with other revenue sources (e.g., surcharges).	National Fuel Gas's WNA is solely focused on recovering costs that are part of the base revenue requirement and does not interact with other revenue sources, such as Section 1307 automatic adjustment surcharges, restructuring riders, or system improvement charges under Section 1353.	I agree that NFG's WNA will not interact with other surcharges.

#	Statement of Policy	Company's Response (Exhibit JDT-3)	CAUSE-PA Response
12	Whether the alternative ratemaking mechanism and rate design include appropriate consumer protections.	National Fuel Gas's WNA includes several consumer protections to ensure fairness and transparency, as follows:	The WNA is not fair in that it results in a benefit to the Company, but not the customer and diminishes the potential benefits available to low income customer through LIURP. Nor is it transparent. Its concept of paying for gas that is unused and its complicated formula needed to determine the WNA charge are not easily comprehended or understood.
		a. No Over-Recovery of Revenue: The WNA mechanism results in an adjusted bill that reflects the revenues that would be recovered under normal weather, i.e., the same normal weather used to set rates. The Company does not recover additional distribution revenues due to colder than average temperatures that result in higher-than-normal usage from customers. This is ensured by limiting the mechanism to the heating season and having a deadband.	Although the deadband purports to be a protection, it simply acts as a control mechanism to avoid the worst effects of the WNA. Further, it is ironic that there would be no need for such a control in the absence of the WNA. Finally, NFG's WNA is unreasonably designed in that it extends from October through May, which is far beyond the winter heating season.
		b. No Cross-Subsidization: The WNA is customer-specific.	I do not concur in the conclusion that this feature is a consumer protection. Since the WNA is designed to achieve an overall rate recovery for the entire class, it would seem to be fairer if it were not imposed on an individual customer, but on the entire class.

#	Statement of Policy	Company's Response (Exhibit JDT-3)	CAUSE-PA Response
		c. Regulatory Oversight: The WNA is subject to Commission review and regulatory reporting requirements to ensure compliance with approved revenue stabilization objectives and to protect consumers from unintended rate impacts.	There is no unique regulatory oversight or reporting asserted by NFG in regard to the WNA. These features are already inherent in the current regulatory structure. The WNA adds nothing with regard to these factors.
		d. Customer Transparency: National Fuel Gas provides clear bill disclosures and customer education regarding WNA adjustments, ensuring consumers understand how the mechanism works and how it impacts their bills.	As stated, the WNA is based on a complicated, difficult to understand, not transparent formula. The mere fact that NFG provides information regarding the WNA does not ensure that customers understand how the mechanism works or how it impacts their bills.

#	Statement of Policy	Company's Response (Exhibit JDT-3)	CAUSE-PA Response
13	Whether the alternative ratemaking mechanism and rate design are understandable to consumers.	The WNA is not a new concept to the regulated utility industry and similar versions have been successfully implemented by other Pennsylvania natural gas distribution companies. The WNA tariff provides detailed information to the customer of how the mechanism works and the adjustments are displayed separately on bills, ensuring full transparency. The Company has also made available Frequently Asked Questions (FAQs) on its website https://www.nationalfuel.com/utility/weather-normalization adjustment-pa-home-biz/ Additionally, the Company sent customers a WNA reminder and plain language insert September 2025, ahead of the winter heating season.	As noted above, I disagree that the WNA is understandable. Customers understand that they should pay for gas distribution service they use, but do not understand that they should pay for service they do not use. The WNA formula is complicated and not transparent, and it is not reasonable for customers to have to understand each of the complicated concepts used to calculate this charge.
14	How the ratemaking mechanism and rate design will support improvements in utility reliability.	The proposed WNA targets the revenue requirement that would have been already subject to scrutiny and approved by the Commission, meaning that its prudency and reasonableness would have been reviewed and deemed appropriate to support reliability driven initiatives. The proposed WNA would help minimize the volatility of the recovery of these costs.	There is insufficient, if any, information in the record to support this claim. It deserves careful scrutiny. There is no evidence that the NFG WNA is tied to the achievement of any reliability improvements or performance.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3059428
	:	
National Fuel Gas Distribution Corporation	:	

SURREBUTTAL TESTIMONY OF HARRY S. GELLER, ESQ.

ON BEHALF OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND

ENERGY EFFICIENCY IN PENNSYLVANIA ("CAUSE-PA")

May 27, 2026

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Appendix A: Cited Discovery Responses

PREPARED SURREBUTTAL TESTIMONY OF HARRY S. GELLER, ESQ.

Q. Please state your name, occupation, and business address.

A. My name is Harry S. Geller. I am a retired attorney. I am the former Executive Director of the Pennsylvania Utility Law Project (PULP). I continue to serve as a consultant to legal aid programs and their clients. I maintain an office at 118 Locust St., Harrisburg, PA 17101 for the purpose of providing consulting services and assistance to low income individuals and the organizations which represent them in utility and energy matters.

Q: Did you previously submit testimony in this proceeding?

A: Yes. I submitted direct testimony on behalf of the Coalition for Affordability Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) pre-marked as CAUSE-PA Statement 1.

Q: What is the purpose of your surrebuttal testimony?

A: My surrebuttal testimony responds to the rebuttal testimonies of witnesses for National Fuel Gas Distribution Corporation (NFG or the Company) Rebecca E. Hillery,[1] Courtney T. Mann,[2] Jason Scouten,[3] Matthew W. Stoops, Jr.,[4] Eric M. Solomon,[5] and John D. Taylor.[6]

My surrebuttal testimony specifically addresses discrete issues raised by these witnesses and is not intended to address every issue raised or otherwise discussed in the direct or rebuttal testimonies submitted by expert witnesses in this proceeding. Absence of a response to any other

[1] NFG St. 1-R.
[2] NFG St. 14-R.
[3] NFG St. 16-R.
[4] NFG St. 17-R.
[5] NFG St. 18-R.
[6] NFG St. 19-R.

specific recommendation or position of any witness does not indicate my agreement. I stand on the evaluations, analyses, and recommendations contained in my direct testimony.

Q: Has your direct testimony, or the analysis and recommendations contained therein, changed based on the rebuttal testimony of other parties in this case?

A: No.

I. UNIVERSAL SERVICE PROGRAMS

Q: To aid in understanding your response to other parties' rebuttal testimony, please summarize the recommendations you made in direct testimony regarding the sufficiency of NFG's Universal Service Programs in light of NFG's requested rate increase.

A: In my direct testimony, I explained that rate affordability is a critical component to determining whether a utility's rate is just and reasonable.[7] To assess rate affordability, it is necessary to examine how low income customers will be impacted by any proposed rate increase, and to make the necessary changes to a utility's universal service programming, rules, and policies to help mitigate that impact and ensure all customers can reasonably afford to maintain safe service to their homes.[8] I further explained that low income customers already have disproportionately high energy burdens, even with assistance from NFG's current universal service programs, and that any increase in rates will result in increased unaffordability and, in turn, increased reliance on universal service programming.[9]

Data clearly shows that NFG's low income customers already struggle to reasonably afford to maintain service to their home, and any increase in rates will drive further disparate payment

[7] CAUSE-PA St. 1 at 25.
[8] Id. at 24-25.
[9] Id. at 13-17.

trouble and termination rates across NFG's low income customer base. As I explained in direct testimony, confirmed low income customers not enrolled in NFG's Customer Assistance Program (CAP) account for approximately 9.6% of residential customers, yet they account for more than half (57.2%) of all payment troubled customers.[10] Confirmed low income customers not enrolled in CAP also account for 52% of dollars in debt and carry on average $198.93 more in debt than do overall residential customers.[11] Critically, confirmed low income customers, inclusive of those enrolled in CAP, are 12.6% of NFG's residential customers but represented 52% of involuntary terminations in 2025.[12] Despite these marked disparities in payment trouble and termination rates, I explained that NFG's CAP reaches only a quarter (25%) of NFG's confirmed low income customers – and just 10.8% of NFG's estimated low income customer base.[13] These numbers together strongly indicate that NFG's rates are already unaffordable for a significant number of its low income customers.

With regard to universal services, in light of these disparate outcomes for low income households, I recommended several reforms to NFG's universal service programs to improve enrollment and retention and to ensure that the programs are more widely available, adequately funded, and effectively designed.[14] My recommendations included, *inter alia*, that the Commission require the Company to implement routine screening of its applicants and customers to determine eligibility for CAP and other universal service programs, to expand and improve upon how the Company uses Low Income Home Energy Assistance Program (LIHEAP) data that it receives from the Pennsylvania Department of Human Services (DHS) to enroll and retain customers in

[10] Id. at 18.
[11] CAUSE-PA St. 1 at 18.
[12] Id. at 18-19.
[13] Id. at 27.
[14] See Id. at 23-50.

CAP, to set benchmarking goals for improving CAP enrollment, and to track and report certain CAP data.[15] I recommended that the Company be required to expand eligibility for its Low Income Usage Reduction Program (LIURP) to customers residing in mobile homes.[16] I also recommended that the Commission reject the Company's proposals to restrict eligibility and reduce grant amounts for its Neighbor for Neighbor (NFN) hardship fund and that the Company take steps to increase funding for NFN.[17]

Q: Please summarize NFG's rebuttal testimony regarding the Company's Universal Service Programs to which you will respond.

A: In general, in their rebuttal, NFG witnesses fail to acknowledge responsibility for and commit to a course of action that is appropriate to the Company's obligation to administer accessible and appropriately funded universal service programs and their interrelated components to ensure low income households within its service territory are able to connect and maintain safe, stable service to their home. The specific NFG testimony which forms the basis of my conclusion and to which I respond is summarized below.

Mr. Stoops disagrees with my recommendation that NFG take proactive steps to identify and confirm the low income status of the Company's customers who have low income, stating that the income screening procedures I proposed would be time consuming and harm customer service levels.[18] He asserts that the Company's current reactive income screening procedures – limited to when NFG receives a LIHEAP grant on behalf of a customer or when a customer contacts NFG when they are unable to pay their bill, inquire about a termination notice or payment arrangement,

[15] CAUSE-PA St. 1 at 12-13, 34-38.
[16] Id. at 44.
[17] Id. at 50.
[18] NFG St. 17-R at 6.

or ask for an extension to pay their bill – are sufficient.[19] Regarding CAP, Mr. Stoops disagrees with my recommendation that NFG be required to implement specific, measurable benchmarking goals for improving the Company's CAP enrollment numbers, asserting that the onus for CAP enrollment should not be on the Company.[20] He states that there are many reasons eligible customers may decline to enroll in CAP and that whether an eligible customer chooses not to apply or recertify for CAP is outside NFG's control.[21] Mr. Stoops disagrees that NFG should be required to perform additional outreach to customers who share LIHEAP data with the Company and are not enrolled in CAP.[22] Mr. Stoops indicates that the Company is evaluating system enhancements to track data regarding CAP accounts with arrears and that the Company will review how to enhance collection of CAP default rate data – though he makes no specific commitment to when or how that review will occur or whether it will take any subsequent steps to improve this critical area of NFG's customer service.[23]

Regarding LIURP, Mr. Stoops asserts that the Company excludes low income customers who live in mobile homes from participating in LIURP because weatherization services in these homes generally yield limited energy consumption savings.[24] He states that mobile homes represent a relatively small portion of households in the Company's service territory, as 94% of NFG's residential customers live in single family or multifamily dwellings.[25] In addition, he notes that customers residing in mobile homes are eligible for services through NFG's Emergency Repair and Replacement Program (ERRP).[26]

[19] Id. at 7-8.
[20] Id. at 10-11.
[21] Id.
[22] NFG St. 17-R at 15.
[23] Id. at 17-19.
[24] Id. at 24.
[25] Id.
[26] NFG St. 17-R at 24.

Regarding the NFN, Mr. Stoops disagrees that the NFN's current funding level is insufficient.[27] He asserts that the Company's proposal to require an applicant to the NFN prove both low income and a designated eligibility criterion to establish eligibility for a hardship grant would not eliminate eligibility for low income households.[28] Mr. Stoops also disagrees with the recommendation that NFG promote fundraising for its NFN because the program's fundraising and certain administrative functions are performed by a third-party administrator, the Greater Erie Community Action Committee (GECAC).[29]

Q: What is your response to Mr. Stoops's disagreement that NFG should take steps to improve its identification of low income customers?

A: I stand by my recommendations, which I believe are essential to improving customer service for NFG's low income customers. As I explained in direct testimony, NFG has confirmed the low income status of fewer than half of the customers in its service territory who are estimated to have low income.[30] This strongly indicates that NFG's current procedures for identifying and confirming the low income status of its low income customers are inadequate.

The income identification procedures that Mr. Stoops describes are entirely reactive and result in NFG screening customers for low income status and eligibility for universal service programs only *after* the customer is already experiencing payment trouble or has received a termination notice. Rather than waiting for customers to reach out after arrears have already piled up, my recommendations focus on prevention, enabling NFG to identify low income customers and connect them to universal service programs, such as CAP, before accumulating unmanageable arrears. Importantly, the determination of who is a qualifying low income household is not a once

[27] Id. at 28.
[28] Id.
[29] NFG St. 17-R at 30-31.
[30] CAUSE-PA St. 1 at 9-10.

and done process that is based on a static group of identified customers since household incomes and composition, among other factors, are subject to change. Identifying low income households requires proactive screening to capture these changes, and the procedures I recommend would help enable NFG to better match these customers to rate assistance and usage reduction services, essential to providing service at just and reasonable rates to low income customers.[31]

I note that in his rebuttal, Mr. Stoops mischaracterizes my recommendation to implement proactive screening procedures to identify low income customers. Screening customers and applicants for income at the time service starts, upon moving, or during non-emergency calls would not require asking every customer for their income information during these interactions or asking all customers whether they wish to opt of income screening procedures, as Mr. Stoops states.[32] Instead, the procedures I recommended in my direct testimony would require NFG to inform customers of the availability of low income assistance programs during these customer interactions and provide customers with the opportunity to voluntarily self-disclose their income to assess eligibility or choose to decline.[33]

Q: What is your response to Mr. Stoops's testimony that routine income screening during non-emergency calls is too time consuming and would negatively impact customer service levels?

A: I disagree that it would be too time consuming to offer customers the opportunity to provide income information during routine customer calls to determine if they are eligible for a lower, income-based rate. It would only take a few seconds to ask whether the customer would like to share their income information to potentially qualify for lower rates and, if the customer answers

[31] Id. at 12.
[32] NFG St. 17-R at 7-8.
[33] CAUSE-PA St. 1 at 12.

yes, to refer them to the CARES team to screen for eligibility for the Company's universal service programs. The bulk of the time taken for the income screening would take place after referral to the CARES team, where actual income information could be collected. The benefits of proactively identifying low income customers and screening them for universal service program eligibility before they run into payment trouble far outweigh the short time it takes to ask customers whether they would like to provide income information.

Mr. Stoops acknowledges that NFG finds it reasonable to evaluate the feasibility of expanding income screening to customer interactions including service establishment, moves, and non-emergency calls.[34] However, evaluating a recommendation to determine its feasibility is not the same as implementing one. This is especially so as NFG appears to be asserting that a process that would take any additional time is infeasible. I stand by my recommendation that the Commission should require NFG to implement this proactive approach to income screening to improve the Company's identification of low income customers and facilitate connecting them with the most advantageous rate available.[35]

Q: What is your response to Mr. Stoops's disagreement with your recommendation that NFG should adopt benchmarking goals for improving CAP enrollment?

A: I disagree with several of Mr. Stoops's assertions about the proposal to adopt benchmarking goals for improving CAP enrollment. Mr. Stoops asserts that there are many reasons an eligible customer might choose to decline to enroll in CAP and that it is out of the Company's control whether a customer chooses not to enroll or recertify eligibility.[36] He also asserts that such goals would improperly place the onus for CAP enrollment on the Company.[37]

[34] NFG St. 17-R at 8.
[35] CAUSE-PA St. 1 at 12.
[36] NFG St. 17-R at 10-11.
[37] Id.

At the outset, I noted in my direct testimony that the majority (75%) of NFG's confirmed low income customers are not enrolled in CAP, and will experience the full, unmitigated impact of the proposed rate increase.[38] Moreover, as I explained in my direct, reliance on confirmed low income counts is fundamentally flawed, as it includes only a small segment of the actual low income population – namely, those who have already been identified by the Company's reactive identification procedures.[39] Only 10.8% of NFG's estimated low income customer population is enrolled in CAP.[40]

I strongly take issue with the assertion that benchmarking goals would improperly shift the onus of CAP enrollment onto the Company. The failure of NFG to acknowledge its responsibility to achieve appropriate enrollment levels is precisely the reason benchmarking goals are essential. The goals I proposed are intended to guide the implementation of recommendations to improve the availability of CAP and would not impose any punitive measures on the Company. As I noted in my direct testimony, despite the Company's outreach efforts, NFG's current CAP enrollment figures represent a backslide from enrollment figures at the time of the Company's last rate case.[41] The Company has rejected reasonable goalposts to help guide a course correction.

Mr. Stoops's testimony is premised on the assumption that the Company is doing sufficient outreach and that, if low income customers wanted to enroll in CAP, they would. This position fails to acknowledge the Company's inadequate CAP enrollment levels or its responsibility to obtain appropriate enrollment levels of the low income households within its service territory. Further, it fails to recognize that many customers are unaware that they may qualify for more advantageous rates, or may not understand the distinctions regarding eligibility, benefits, or

[38] CAUSE-PA St. 1 at 26.
[39] Id. at 10.
[40] Id. at 27.
[41] CAUSE-PA St. 1 at 27.

enrollment methods among multiple programs which make up the patchwork of utility assistance programs in Pennsylvania.

I have spent over 30 years representing low income utility consumers. In my experience, it is rare for a low income consumer to turn down enrollment in CAP or other assistance programs if they are explained the benefits and do not face insurmountable barriers to enrolling. While there are certainly some individuals who may knowingly turn down assistance, it is wholly unreasonable to conclude that a full 75% of NFG's confirmed low income households have been informed about CAP, understand the benefits, and intentionally choose not to apply. To the contrary, in my experience, the vast majority of eligible households do not understand or are not adequately informed about the existence of rate assistance through CAP, or otherwise face a multitude of practical barriers to completing the enrollment process.

The benchmarking goals I proposed in my direct testimony are intended to guide the implementation of improvements to outreach and education – efforts that are squarely within the Company's control – to help overcome the present status of low CAP enrollment.

Q: What is your response to Mr. Stoops's disagreement that NFG should utilize additional means of outreach to customers who participate in DHS LIHEAP data sharing?

A: I reiterate that the data provided to NFG through DHS LIHEAP data sharing is of immense practical value because it indicates both that a customer is income eligible for CAP and that the customer is interested in help enrolling in rate assistance programming.[42] Only 19% of the customers who NFG contacted under its existing procedure for utilizing LIHEAP data for CAP outreach have successfully enrolled in CAP.[43] Mr. Stoops asserts that additional outreach would add time to the referral process, but a conversion rate of just 19% strongly indicates that more time

[42] Id. at 34.
[43] Id.

is necessary to appropriately utilize the data to assist customers with CAP enrollment. I acknowledge that the Company states it will explore adding telephone outreach for these customers.[44] But again, a commitment to potentially explore a solution is not the same as a commitment to implement a solution. NFG is proposing to raise rates in this case, not to explore the potential for raising rates at some future time. In turn, the need to improve access to CAP for eligible households requires action now – not at some future time. I stand by my recommendation that the Commission require NFG to implement additional outreach efforts to facilitate CAP enrollment for those participating in LIHEAP data sharing.

Q: What is your response to Mr. Stoops's rebuttal regarding the tracking and reporting of CAP arrearage and default data?

A: I acknowledge that the Company is evaluating system improvements to track and report data regarding CAP accounts with arrears and that the Company anticipates implementing changes by mid-2027.[45] I also acknowledge that the Company says it will review its tracking and reporting of its CAP default rate.[46] Accurate and complete information about the number of CAP customers with program arrears, the extent of those arrears, and the percentage of customers who default on CAP is critical for evaluating the Program's effectiveness at providing affordable energy burdens for customers. The Commission should require that NFG promptly implement these system improvements to ensure NFG's CAP can be appropriately evaluated.

[44] NFG. St. 17-R at 16.
[45] Id. at 18.
[46] Id. at 19.

Q: What is your response to Mr. Stoops's disagreement with your recommendation that LIURP eligibility be expanded to customers who reside in mobile homes?

A: I stand by my recommendation. Mr. Stoops asserts that there are practical obstacles to weatherizing mobile homes, including limited space and the need for structural repairs.[47] However, it is improper to exclude an entire category of dwelling type from LIURP services because they can be inconvenient to treat. NFG's LIURP includes funding both for remediating health and safety issues and for incidental repairs designed to overcome these barriers to delivering weatherization services.[48]

Mr. Stoops notes that customers who reside in mobile homes are eligible for the Company's Emergency Repair and Replacement Program (ERRP).[49] ERRP's emergency services, however, serve a different function than LIURP, which is intended to reduce customer's bills.[50] ERRP does not provide the same long-term usage and bill reductions as LIURP, which could help address rate unaffordability for customers residing in mobile homes at existing and proposed rates.

Mr. Stoops notes that mobile home residents represent a small portion of the Company's residential customers, highlighting that 94% of NFG's residential customers reside in single family or multifamily housing.[51] However, for purposes of assessing the adequacy of the program design of LIURP, which is available to customers up to 200% FPL, it is more important to look at the proportion of customers who are potentially eligible for LIURP services. NFG customers who reside in mobile homes represent a much larger proportion of the Company's customers who are at or below 200% FPL.[52] In some counties NFG serves, as much as 17% of customers at or below

[47] Id at 24.
[48] National Fuel Gas Distribution Corporation, Universal Service and Energy Conservation Plan (USECP), Docket No. M-2021-3024935, (revised January 2, 2024) (hereinafter 2022-2026 USECP) at 67.
[49] NFG St. 17-R at 24.
[50] 52 Pa. Code § 58.1.
[51] NFG St. 17-R at 24.
[52] APPRISE, National Fuel Gas LIURP Evaluation Final Report, Sept. 2024 at 28-29.

150% FPL and 12% of customers between 151%-200% FPL reside in mobile homes.[53] NFG's policy inappropriately excludes a large proportion of potentially eligible customers from receiving bill reductions through LIURP. The Commission should require that NFG end its exclusion of mobile home residents from receiving LIURP services.

Q: What is your response to Mr. Stoops's disagreement with your recommendation that the Commission reject the Company's proposed modifications to NFN and increase funding for the program?

A: NFG acknowledges that adequate funding for the NFN is critical to meeting customers' needs and that funding has decreased to a critical level.[54] The Company's proposed solution to addressing the funding crisis, however, places the entire burden on customers facing emergencies by restricting eligibility and reducing grants with no commitment from the Company to do anything to increase available funding. My recommendation that the Commission reject NFG's proposed restrictions to NFN eligibility remains unchanged, and I reiterate my recommendation that the Company act to increase contributions to the hardship fund.[55] Without increased contributions, there is a serious risk the NFN will be depleted again.

Mr. Stoops asserts that the proposal to require NFN applicants to both meet an income threshold and prove an additional eligibility criterion would not eliminate eligibility for low-income households.[56] The proposal, however, would have exactly that effect for many low income households. As I stated in my direct testimony, requiring both income eligibility and an additional eligibility criterion would exclude income-eligible households that are unable to demonstrate an

[53] Id.
[54] NFG St. 17-R at 27.
[55] CAUSE-PA St. 1 at
[56] NFG St. 17-R at 28.

additional specified hardship.[57] The Commission should affirm that income eligibility is sufficient to qualify for NFN and reject NFG's proposal.

Further, my concern that restricting eligibility to non-customers could result in the exclusion of former customers whose service has been disconnected for more than 30 days[58] has not been alleviated simply by Mr. Stoops' assertion that this will not happen. NFG should be required to make explicit that former customers are eligible for assistance through NFN to help with reconnection costs. Additionally, the flexibility to reduce grant amounts downward during periods of reduced fund balances that NFG proposes, without any solution to address the chronically low levels of funding in the NFN, will result in permanently reduced grant amounts for customers in need of emergency assistance. The most effective solution to prevent depletion of the fund is to increase available funding.

Mr. Stoops asserts that NFG cannot encourage fundraising for the NFN because the fund is administered by GECAC, a third party entity.[59] It is NFG, not GECAC, that has the obligation to ensure that the Company's universal service programs are appropriately funded and available to serve the needs of low income customers in its service territory.[60] NFG cannot disclaim its universal service obligations through the use of a third party to administer. I note here that counsel for CAUSE-PA will address the legal aspects of this issue through briefing. Nevertheless, as a matter of public policy, I believe the Company can and must do more to ensure adequate funding for NFN and not rely solely on cutting grants to customers in crisis to address NFN's critically low level of funding.

[57] CAUSE-PA St. 1 at 48.
[58] Id. at 49.
[59] NFG St. 17-R at 30-31.
[60] 66 Pa. C.S. § 2203(8).

II. ENERGY EFFICIENCY PILOT PROGRAM

Q: Please summarize the recommendations you made in your direct testimony regarding NFG's proposed Energy Efficiency Pilot Program.

A: I recommended that the Commission require NFG to revise its proposed Energy Efficiency Pilot Program (EE Pilot) to include a targeted low income component to enable low income customers to realistically participate in the program, which they would be required to fund.[61] As I explained, low income customers have no margin in their budgets to carry any portion of the upfront cost of high efficiency equipment while waiting for a rebate and thus would be effectively foreclosed from participating in the EE Pilot as proposed.[62] I also recommended that the Company integrate the EE Pilot with other energy efficiency programs, such as NFG's LIURP, the LIURP and Act 129 programs available from FirstEnergy, and the federal Weatherization Assistance Program.[63]

Q: Please summarize the Company's response to your recommendations.

A: NFG witness Erik M. Solomon asserts that I did not contend that the EE Pilot is imprudent, technically flawed, or unreasonable as proposed.[64] Mr. Solomon describes my recommendation to include a dedicated low income subprogram within the EE Pilot as reflective of policy preference, rather than correction of a defect in the proposed pilot's design.[65] He asserts that no statute, regulation, or Commission order requires a voluntary gas EE pilot to include dedicated low income offerings.[66] He also asserts that it is unsubstantiated that rebate-based programs are inaccessible to low income consumers.[67] In addition, Mr. Solomon states that the recommendation to include low

[61] CAUSE-PA St. 1 at 65-66.
[62] Id. at 62-63.
[63] CAUSE-PA St. 1 at 66-67.
[64] NFG. St. 18-R at 2.
[65] Id.
[66] NFG St. 18-R at 5.
[67] Id. at 4.

income programming within the EE Pilot is best understood as a request for a new or expanded program and asserts that the pilot's budget was not designed to accommodate a low income subprogram.[68]

Q: What is your response to Mr. Solomon's disagreement with your recommendations regarding the EE Pilot?

A: Mr. Solomon mischaracterizes my direct testimony by asserting that I did not contend that the EE Pilot, as proposed, is imprudent, technically flawed, or unreasonable. As I stated in my direct testimony, "[i]t is unjust and unreasonable to force financially struggling customers to pay for a program from which they are unable to meaningfully participate or derive any quantifiable benefit."[69] I stand by my assessment that as proposed, NFG's EE Pilot is unjust and unreasonable because its design, which includes only partial rebates, is effectively inaccessible to low income consumers, but nevertheless low income consumers would be required to contribute to the pilot's costs.[70]

My recommendation to require NFG to include a dedicated low income subprogram within its EE pilot is based not on philosophy or policy but is grounded in the material reality that low income customers cannot afford to participate in rebate-based programs. Mr. Solomon points to Act 129 as a model to support the Company's decision to recover costs for the EE Pilot through a rider.[71] At the same time, however, he dismisses the need to include low income programming within the EE Pilot because no statute requires the Company to do so.[72] In this way, NFG borrows aspects of the Act 129 framework that benefit the Company, and disregards the requirements of

[68] Id. at 19-20.
[69] CAUSE-PA St. 1 at 63.
[70] See Id. at 62-64.
[71] NFG St. 18-R at 14.
[72] Id. at 5.

the Act 129 framework that are intended to safeguard low income consumers. As the Commission has recognized in the context of Act 129, targeted low income program requirements help "to ensure that low-income customers are able to access and participate in the EDCs' efficiency programs" and help "to ensure that low-income customers realize significant benefits from these programs."[73] Dedicated low income programming has been part of the Act 129 framework since its inception.[74] The Commission has recognized over and over again that such program requirements are necessary to ensure that low income consumers have equitable access to energy efficiency programs because market rate programs do not reach low income consumers. My direct testimony clearly highlighted that low income consumers do not have any margin in their budget to afford the upfront payments required to make participation in a rebate-only program feasible.

My recommendation to include dedicated low income program offerings as a component of the EE Pilot is not a proposal for a new program or to expand the pilot's budget. As a component of the EE Pilot, the low income subprogram I recommend would fit into the existing pilot's budget and should reflect a proportion of the overall pilot budget equivalent to the proportion of low income customers' usage. This would help ensure that the funding collected from low income customers to fund the program would be available to provide energy efficiency measures for low income customers.

In its rebuttal testimony, NFG has failed to adequately respond to my testimony that the upfront costs would make participation in the EE Pilot unrealistic for low income consumers. NFG has not substantiated that low income customers would be able to participate in the EE Pilot. The Company has taken no steps to design the pilot in a way that will be accessible to low income

[73] Implementation Order, Energy Efficiency and Conservation Program, Docket No. M-2025-3052826 (entered Jun. 18, 2025) at 68.
[74] Id. at 53.

consumers but intends to require that they contribute to cost recovery for the pilot. As proposed, the Company's EE Pilot would produce unjust and unreasonable results. I stand by my recommendation that the Commission require NFG to amend its EE Pilot proposal to include dedicated low income programming within the proposed program budget.

III. CUSTOMER CHARGE PROPOSAL

Q: Please summarize the recommendations you made regarding NFG's proposal to increase the fixed customer charge.

A: I recommended that the Commission authorize no increase to NFG's residential customer charge.[75] I explained that the Company's proposal undermines the ability of consumers to control their bills through energy efficiency and conservation efforts because when more of a customer's bill is locked into the fixed charge, less of it is dependent on volumetric usage, diminishing the ability to control costs through reduced usage.[76]

Q: Please summarize the Company's testimony regarding the customer charge to which you will respond.

A: NFG witness Courtney T. Mann disagrees with my assessment that NFG's proposed increase to the residential customer charge is "massive."[77] Ms. Mann asserts that the proposed charge would be in line with other Pennsylvania natural gas utilities, pointing specifically to the fixed charge the Commission recently authorized for Columbia Gas of Pennsylvania.[78] NFG witness John D. Taylor asserts that under NFG's proposed $19 monthly customer charge, approximately 59% of residential customer revenues would be collected through volumetric

[75] CAUSE-PA St. 1 at 54.
[76] Id. at 51.
[77] NFG St. 14-R at 2.
[78] Id.

charges and that such a bill structure would provide customers with meaningful opportunities to reduce their gas bills through usage reduction and energy efficiency measures.[79]

Q: How do you respond to the Company's disagreement with your testimony regarding the customer charge?

A: I stand by my assessment that NFG's residential customer charge proposal is excessive and continue to recommend that the Commission authorize no increase to the charge.

NFG's proposal would lock the majority of its proposed rate increase into the customer charge, leaving just a small portion of the rate increase mitigable through usage reduction. As I discussed in my direct testimony, under NFG's proposed rate increase, after the one-year Other Post Employment Benefits (OPEB) refund rider expires a year after rates would take effect, the monthly bill for a residential customer using 80 Ccf of gas per month would increase by $6.79 over current rates to a total bill of $90.28 per month.[80] Of that $6.79 increase, 74% would be locked into the $5 hike to the customer charge, leaving just 26% of the rate increase recovered through volumetric charges – and therefore mitigable through usage reduction. The $19 customer charge NFG proposes would represent more than one-fifth (21%) of a customer's monthly bill at 80 Ccf per month.[81]

Ms. Mann asserts that NFG's proposed fixed charge would be in line with other Pennsylvania gas utilities and specifically highlights the fixed charge the Commission recently authorized for Columbia Gas.[82] In setting the customer charge for Columbia Gas, however, the Commission acknowledged that the ability for consumers to reduce their bills through efficiency and

[79] NFG St. 19-R at 27.
[80] CAUSE-PA St. 1 at 4.
[81] [$19 ÷ $90.28 = 21%].
[82] NFG St. 14-R at 2.

conservation depends on a bill structure that bases cost recovery on volumetric usage.[83] The Commission rejected Columbia's request to increase the customer charge to an amount that would represent 20.7% of a customer's monthly bill, instead authorizing a customer charge representing 14.9% of a customer's monthly bill.[84] NFG's proposal to increase its customer charge to 21% of a customer's monthly bill is not in line with the proportion the Commission authorized for Columbia Gas. If NFG's proposed rate increase were approved in full, to match the 14.9% proportion the Commission found to be reasonable for Columbia Gas, NFG's fixed charge would in fact be *reduced* to $13.45 per month.[85]

NFG's proposal to recover the majority of its rate increase through the customer charge would severely restrict customers' ability to use energy efficiency and conservation to alleviate increased bills. I continue to recommend the Commission authorize no increase to NFG's customer charge.

IV. WEATHER NORMALIZATION ADJUSTMENT (WNA) PROPOSAL

Q: Please summarize your direct testimony regarding NFG's WNA proposal.

A: I recommended that the Commission end NFG's WNA pilot and not authorize it to become a permanent aspect of NFG's rate design.[86] I explained that although, in theory, the WNA is bi-directional, in practice, it more often and to a greater extent works to the benefit of NFG at the expense of customers.[87] I noted that Pennsylvania is experiencing a long-term warming trend that experts, including NFG witness John D. Taylor, project to continue.[88] I explained that this warming trend means that there will be fewer Heating Degree Days (HDD) over time, resulting in increasing

[83] Pa. PUC v. Columbia Gas of Pa., Inc., Opinion and Order, Docket No. R-2025-3053499 at 279 (Order entered Dec. 4, 2025).
[84] Id. at 282 (Order entered Dec. 4, 2025).
[85] [$13.45 ÷ $90.28 = 14.9%].
[86] CAUSE-PA St. 1 at 59.
[87] Id.
[88] CAUSE-PA St. 1 at 57.

WNA charges to customers if the WNA is allowed to continue.[89] I also discussed how the WNA undermines the goals of LIURP by reducing savings achievable through usage reduction on the volumetric portion of customers' bills.[90] In addition, I explained that the WNA is confusing to consumers because it is based on a complicated formula that charges customers based on hypothetical usage, subverting consumers' expectation that they will be billed based on the amount of gas they actually use.[91]

In my direct, I recommended that if NFG's WNA is allowed to continue, the Commission should require several reforms to its design. These included requiring that the WNA remain as a pilot no longer than three years, that CAP customers be exempt from the WNA, that operable months be limited to the Commission-recognized winter months of December through March, that the deadband be increased to 5%, and that the WNA be calculated based on a rolling ten-year average that is updated annually.[92] However, my primary recommendation remains that the Commission end NFG's WNA pilot.

Q: Please summarize the Company's rebuttal testimony regarding the WNA proposal to which you will respond.

A: NFG witness Rebecca E. Hillery asserted that the WNA is a symmetrical mechanism and that it is irrelevant whether temperatures are more often warmer than normal than they are colder than normal.[93] Ms. Hillery states that the 2025-2026 winter season was colder than normal and that the WNA provided a credit to customers in some months.[94] She asserts that the WNA has

[89] Id.
[90] CAUSE-PA St. 1 at 58.
[91] Id.
[92] CAUSE-PA St. 1 at 59-60.
[93] NFG St. 1-R at 7-8.
[94] Id. at 8-9.

worked as designed and that it mitigates risk for customers and the Company equally.[95] In addition, Ms. Hillery asserts that affordability should be viewed through a long-term lens.[96]

NFG witness John D. Taylor asserts that the WNA is not a "one-way surcharge mechanism" because customers have received WNA credits in some months.[97] Mr. Taylor asserts that Pennsylvania's warming trend will not produce ever-increasing revenues for the Company, and that it does not accelerate cost recovery or change NFG's Commission-authorized revenue requirement.[98] Mr. Taylor disagrees that the WNA charges customers for hypothetical usage, asserting that the WNA does not create additional usage or collect revenues unrelated to service provided.[99] He disagrees that the WNA exacerbates energy unaffordability, and asserts that affordability protections are most appropriately delivered through universal service programs.[100] Mr. Taylor notes that in the 2025-2026 WNA season, from October 2025 through March 2026, the WNA resulted in approximately $2.6 million in net credits to customers.[101] In addition, he asserts that NFG's WNA should run from October through May because the Company's service territory experiences colder temperatures than other parts of the state and that using a rolling ten-year average for the WNA calculation would result in misalignment between the WNA and base-rate billing determinants.[102]

Q: What is your response to the Company's disagreement with your recommendations?

A: The WNA is not a symmetrical mechanism, and it does not protect consumers. I stand by the recommendations in my direct testimony. The Commission should end NFG's WNA.

[95] Id. at 9.
[96] Id. at 11.
[97] NFG St. 19-R at 30.
[98] Id. at 35.
[99] Id. at 36.
[100] Id. at 36-37.
[101] Id. at 38.
[102] Id. at 39-41.

Although the WNA may in theory be bi-directional, in actual practice, the WNA operates to shield the Company from the risk of weather volatility at the expense of consumers. Ms. Hillery asserts that it is irrelevant whether temperatures are more often warmer than normal than they are colder than normal, but in the context of the WNA, the historic warming trends we have had and are expected to experience over the long term are inherently relevant to assessing the impact the WNA has and will continue to have on customers in actual practice. Ms. Hillery and Mr. Taylor note that customers received WNA credits in some months of the 2025-2026 WNA season.[103] From October 2025 through February 2026, Residential Sales customers received net WNA credits totaling $2,909,408.39.[104] But in March and April 2026 alone, the WNA imposed charges on Residential Sales customers totaling $2,053,616.08, reducing net credits for the 2025-2026 WNA season so far to $855,792.31 – before inclusion of May, when temperatures exceeded 90 degrees for multiple days.[105] In my direct testimony, I noted that the WNA had extracted a net $4.4 million in additional charges from residential customers over the course of NFG's pilot through February 2026.[106] In the time since, that figure has only climbed further to nearly $6.5 million in total net charges imposed on Residential Sales customers through April 2026.[107]

Mr. Taylor asserts that affordability protections for income-eligible consumers are best addressed through universal service programs.[108] But as I have discussed at length and demonstrated with substantial data and evidence, NFG's universal service programs reach only a

[103] NFG St. 1-R at 8-9; NFG St. 19-R at 38.
[104] NFG Response to OCA IX-38, Attachment IX-38. Attached hereto at Appendix A.
[105] NFG Response to CAUSE-PA 8-1, Attachment 8-1. Attached hereto at Appendix A.
[106] CAUSE-PA St. 1 at 56. The WNA resulted in a net total of $4,443,004.96 in additional residential customer charges from October 2023 through February 2026.
[107] Id.; NFG Response to CAUSE-PA 8-1, Attachment 8-1. The WNA resulted in a net total of $2,053,616.08 in charges for Residential Sales customers in March and April 2026, for a total of $6,496,621.04 net charges since October 2023.
[108] NFG St. 19-R at 36-37.

small fraction of the low income customers within its service territory.[109] NFG's WNA applies broadly to all residential customers, contributing to rate unaffordability and exacerbating energy insecurity, effects felt most acutely by the approximately nine out of ten of the Company's estimated low income customers who are not enrolled in CAP. Consumer protections and the affordability of rates, inclusive of rate design choices and alternative ratemaking mechanisms like the WNA, are central to assessing justness and reasonableness.[110] NFG unreasonably rejects all recommendations set forth by CAUSE-PA, the OCA, and I&E to enhance consumer protections in the design of its WNA that could help mitigate its worst excesses.

Assessing the effects of the WNA in actual practice through a long-term lens of affordability undermines any assertion that the mechanism is bi-directional or serves to protect consumers. A narrow focus on a few months where the WNA produced credits misses the big picture of how the WNA actually affects affordability. Zooming out just slightly to examine the full 2025-2026 WNA season so far shows how the WNA takes back any short-term benefit it provides, and zooming out further to assess the full pilot period lays bare that the WNA has been an abject failure at protecting consumers and does not have bi-directional benefits in practice. The WNA exacerbates energy unaffordability. The Commission should end this failed experiment.

V. TARIFF RULE 8 PROPOSAL

Q: Please summarize your direct testimony regarding NFG's proposed amendments to Tariff Rule 8.

A: I recommended that the Commission reject NFG's proposal to add language specifying the presence of certain health and safety concerns at customers' premises as constituting denial of free

[109] See CAUSE-PA St. 1 at 23-45.
[110] 52 Pa. Code § 69.3302.

access to gas equipment.[111] I raised concerns that the language NFG proposes to include in its tariff could authorize NFG to terminate or refuse service to customers and applicants based on the Company's subjective assessment of health and safety issues at a customer's home that may be beyond the control of the customer.[112] I also noted that NFG already has protocols in place for responding to the presence of health and safety issues at a customer's home without the proposed tariff language.[113]

Q: Please summarize the Company's response to your recommendation.

A: NFG witness Jason Scouten asserts that the proposed tariff language would provide objective standards for determining when safety concerns justify delaying or refusing service to customers.[114] Mr. Scouten asserts that the proposed tariff language would not substantively expand the scope of health and safety concerns that constitute "non-access," and would provide greater clarity to customers and landlords about what conditions could delay service.[115]

Q: What is your response to Mr. Scouten's disagreement with your recommendation?

A: I stand by my original analysis of the proposed language and reiterate my concern that the language is not needed and could enable NFG to refuse or terminate service to customers based on subjective concerns without adequate safeguards or process. Simply stating that the proposals add objectivity does not make it so. As proposed, the new standard would infuse bias and subjectivity into decisions about the deprivation of service, allowing moral judgement to take the place of objective criteria. In addition, I recommend that the Commission require NFG to track and report terminations, delays, and denials of service based on the presence of health and safety conditions

[111] CAUSE-PA St. 1 at 71.
[112] Id. at 70-71.
[113] CAUSE-PA St. 1 at 70-71.
[114] NFG St. 16-R at 2.
[115] Id. at 3.

and detail the steps taken through NFG's Safety Gatekeeper Program to help connect customers experiencing such conditions to remediation resources.

Q: Does this conclude your surrebuttal testimony?

A: Yes.

CAUSE-PA Statement 1-SR, Geller

Appendix A

Interrogatories of CAUSE-PA to NFG
NFG Response to CAUSE-PA 8-1, Attachment

Interrogatories of OCA to NFG
NFG Response to OCA IX-38, Attachment

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please provide the aggregate residential class Weather Normalization Adjustment (WNA) charges or credits assessed in March 2026 and April 2026, disaggregated by month, as of the last day of the month.

Response

Please see Attachment CAUSE-PA 8-1.xlsx for the WNA charges assessed in March 2026 and April 2026.

Cause-PA 8-1
Weather Normalization Adjustment

	03/26	04/26
Residential Sales	899,274.81	1,154,341.27
Residential Transportation Rev	100,415.40	130,162.03
	999,690.21	**1,284,503.30**

NATIONAL FUEL GAS DISTRIBUTION CORPORATION
PENNSYLVANIA DIVISION
RESPONSE TO REQUEST FOR INFORMATION
R-2025-3059428

Question

Please provide the WNA revenues for each month since the inception of the mechanism, showing WNA charges and credits separately by customer class. Provide all workpapers and source documents supporting the Company's response in electronic form with all spreadsheet links and formulas intact and all source data used. To the extent the information requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.

Response

Please see attachment OCA IX-38.xlsx for WNA revenue.

OCA IX-38

Weather Normalization Adjustment Revenues

	10/23	11/23	12/23	1/24	2/24	3/24
Residential Sales	93,727.43	146,624.59	257,001.35	810,500.36	999,259.52	1,894,779.27
Commercial Sales	6,410.84	11,879.85	20,891.07	75,536.01	92,149.57	179,651.91
Industrial Sales	3.15			6.21	3.94	13.65
Public Authority Sal	320.52	926.17	1,667.56	3,742.03	5,631.73	9,820.27
Residential Transportation Rev	9,054.41	14,509.10	24,959.87	81,104.49	97,524.35	188,199.75
Commercial Transportation Rev	2,907.81	5,062.57	8,817.60	34,603.90	38,467.79	79,630.73
Public Authority Trans Rev	333.96	869.50	1,282.98	4,527.08	4,956.23	9,765.18
Total	**112,758.12**	**179,871.78**	**314,620.43**	**1,010,020.08**	**1,237,993.13**	**2,361,860.76**

OCA IX-38

Weather Normalization Adjustment Revenues

	4/24	5/24	6/24	7/24	8/24	9/24	10/24
Residential Sales	565,460.95	877,192.60	(38,641.37)	(7,760.98)	(5,773.66)	(2,885.65)	283,993.47
Commercial Sales	49,172.46	72,122.52	(11,664.12)	(618.72)	(586.18)	(113.01)	21,172.23
Industrial Sales	3.41	8.21					3.26
Public Authority Sal	3,094.31	4,400.22	(720.55)	(62.72)	(3.59)		1,211.60
Residential Transportation Rev	57,709.81	88,457.91	(3,182.30)	(853.99)	(306.60)	(317.97)	29,949.91
Commercial Transportation Rev	23,238.47	32,575.21	(3,613.09)	(189.91)	(307.22)	(26.37)	9,874.87
Public Authority Trans Rev	3,511.32	4,215.72	(478.98)	(32.43)	55.91	(10.30)	1,109.82
Total	**702,190.73**	**1,078,972.39**	**(58,300.41)**	**(9,518.75)**	**(6,921.34)**	**(3,353.30)**	**347,315.16**

OCA IX-38

Weather Normalization Adjustment Revenues

	11/24	12/24	01/25	02/25	03/25	04/25
Residential Sales	856,505.54	84,939.34	(193,447.50)	(242,178.20)	461,988.19	477,630.65
Commercial Sales	67,182.86	6,479.70	(17,152.00)	(25,872.24)	46,610.47	49,000.82
Industrial Sales	6.63	(8.25)	(20.54)	(3.74)	60.59	14.19
Public Authority Sal	4,363.60	317.79	(1,278.67)	(1,321.68)	3,285.17	2,453.24
Residential Transportation Rev	89,936.41	11,831.62	(20,171.77)	(27,719.55)	49,117.26	54,761.74
Commercial Transportation Rev	29,355.31	5,159.27	(7,371.75)	(11,356.20)	17,581.35	21,167.26
Public Authority Trans Rev	3,744.79	1,127.00	(910.60)	(1,761.82)	2,267.03	3,167.95
Total	**1,051,095.14**	**109,846.47**	**(240,352.83)**	**(310,213.43)**	**580,910.06**	**608,195.85**

OCA IX-38

Weather Normalization Adjustment Revenues

	05/25	06/25	07/25	08/25	09/25	10/25	11/25
Residential Sales	38,598.31	(2,474.18)	(358.54)	(1,374.75)	(893.39)	234,653.39	(240,017.88)
Commercial Sales	3,010.47	(1,265.16)	(22.43)	180.36	(126.24)	18,869.90	(21,500.54)
Industrial Sales	(5.92)			5.92		13.80	(18.66)
Public Authority Sal	(80.41)	(43.90)	28.77	8.79	(7.38)	1,075.19	(1,351.02)
Residential Transportation Rev	5,112.01	(883.02)	(116.55)	(198.91)	(87.57)	27,037.16	(25,839.25)
Commercial Transportation Rev	1,692.02	(717.02)	25.07	(16.39)	(38.76)	8,625.57	(8,497.17)
Public Authority Trans Rev	178.82	(167.36)	30.09	(5.14)	(2.56)	886.89	(990.07)
Total	**48,505.30**	**(5,550.64)**	**(413.59)**	**(1,400.12)**	**(1,155.90)**	**291,161.90**	**(298,214.59)**

OCA IX-38

Weather Normalization Adjustment Revenues

	12/25	01/26	02/26	Grand Total
Residential Sales	(957,751.07)	(366,673.97)	(1,579,618.86)	4,443,004.96
Commercial Sales	(89,375.68)	(36,125.85)	(171,615.79)	344,283.08
Industrial Sales	2.41		(28.26)	60.00
Public Authority Sal	(5,354.93)	(2,529.22)	(8,314.15)	21,278.74
Residential Transportation Rev	(105,374.88)	(40,543.35)	(180,920.37)	422,749.72
Commercial Transportation Rev	(35,806.81)	(15,709.58)	(67,124.49)	168,010.04
Public Authority Trans Rev	(4,623.52)	(2,750.25)	(8,268.91)	22,028.33
Total	**(1,198,284.48)**	**(464,332.22)**	**(2,015,890.83)**	**5,421,414.87**

PENNSYLVANIA WEATHERIZATION PROVIDERS TASK FORCE

PWPTF Statement No. 1

Direct Testimony of Jennifer Warabak

In Re: National Fuel Gas Distribution Corporation

Docket Number: R-2025-3059428

Q. Please state your full name and business address.

A. Jennifer Warabak, 165 Amber Lane, PO Box 1127, Wilkes-Barre, Pennsylvania 18703-1127.

Q. By whom are you employed and in what capacity?

A. I am employed by the Commission on Economic Opportunity (CEO) as Executive Director. I am submitting this testimony on behalf of the Pennsylvania Weatherization Providers Task Force as a member of the Task Force.

Q. What are the interests of the Task Force in this rate case?

A. The Pennsylvania Weatherization Providers Task Force, Inc., is a Pennsylvania non-profit corporation and a statewide association of thirty-eight (38) non-profit organizations providing utility assistance and energy conservation services in each of the Commonwealth's sixty-seven counties. The Task Force, through its member agencies, several of which are Pennsylvania community-based organizations, administers universal service programs for several utility companies. The Task Force members serve low-income ratepayers, and it is part of our responsibility to our constituency to advocate for their interests in regulatory proceedings, and this proposed request will certainly have an impact upon those low-income ratepayers. In addition to the affordability of transmission and distribution rates, the Task Force is particularly interested in the adequacy and operation of a company's universal service program.

Q. What background and experience in energy issues qualify you to submit testimony in this case?

A. I was appointed as the Executive Director of the Commission on Economic Opportunity in October 2022. I have been employed at CEO for over 20 years and during my tenure I have been involved in numerous energy related programs that CEO operates. From 2004 to 2016, I was CEO's Energy Services Coordinator where I supervised CEO's energy programs. During that time, I managed eight hardship utility programs and managed the LIHEAP Crisis program for Luzerne County on behalf of the Pennsylvania Department of Human Services as well as other utility customer assistance programs for several utility companies. In 2016 I became CEO's Program and Planning Coordinator where I evaluated program effectiveness and recommended modifications and/or improvements across the spectrum of programs offered by CEO, in the areas of energy, housing, job training etc.

During my tenure in those positions, CEO's experience and the expertise of its staff in energy programs has been recognized on state and national levels. CEO's energy related programs have been acknowledged by receipt of a Superior Achievement Award from the United States Department of Energy. CEO has weatherized more than 27,000 homes under the U.S. Department of Energy Weatherization Assistance Program. CEO also serves as a subcontractor for universal programs operated by several Pennsylvania gas and electric utility companies. CEO is also the PA Department of Public Welfare's contracted operator of the crisis component of the Low-Income Home Energy Assistance Program (LIHEAP) in Luzerne and Wyoming Counties.

Q. Before addressing the specifics of your testimony, does the Task Force take a position on whether the Company's rate increase should be granted?

A. Our primary focus is on the funding and availability of universal service programs and opposing rate designs that discourage conservation. In this case, we oppose any rate increase unless it is accompanied by measures that would provide additional relief to the Company's customers, particularly low-income customers, from the effects of a rate increase.

Q. Please describe the areas of your testimony.

A. My testimony will address the Company's proposal to increase the fixed monthly charge for residential customers as well as proposals to help low-income customers deal with any resulting rate increase.

In its request for a rate increase the Company does not propose any increase in universal service funding that would help low-income customers deal with the proposed rate increase. Further, an increase in the fixed monthly charge, as requested by the Company, would negatively impact a customer's motive and ability to conserve energy. The company's proposal if granted would increase rates, discourage conservation and leave a customer with less ability to conserve energy and less ability to reduce their bills. Despite the impact of its proposal on residential customers, and in particular low-income customers, the Company's proposal offers nothing in the way of changes or increases in funding to its universal programs, programs that would help mitigate the negative impact of the Company's proposals especially considering these difficult economic times.

If the Company's request is approved in its entirety, the total monthly bill for an average

residential customer using 80 ccf of gas per month would increase from $83.49 to $88.44 per month, or 5.9%. Despite this requested increase in rates, the Company is not proposing any increased universal service assistance to help low-income customers deal with a rate increase.

Q. What rate design issue would you like to address?

A. In this case the Company is proposing to increase its fixed monthly charge from $14.00 to $19.00 an increase of over 35%. I am concerned about this proposal, and the Task Force opposes any increase to the fixed monthly customer charges.

Part of the proposed increase to residential customer's rates will be due to this increase in the fixed monthly customer charge. This increase in the monthly fixed charge concerns me, as it has the Commission, because it discourages conservation and impacts a customer's ability to save money through conservation. As the Company moves towards charging customers based upon the Company's fixed costs and away from a customer's consumption there is less incentive, and ability, to conserve. One of the only defenses a family, particularly a poor family, has against the sharp increases in energy costs is to conserve – lower the thermostat, seal air leaks, change filters regularly, add more insulation, get a more efficient heating unit, etc. The Company's proposal to increase fixed costs greatly impacts a customer's motive to conserve and the ability to lessen the impact of any rate increase. The combined effect of an increase in rates and an increase in fixed monthly charges, without any changes to universal service funding or other measures to help low-income customers, not only results in higher rates but also lessens

the ability of customers to deal with those increases. In particular, the negative impact would be particularly harsh on the Company's low-income customers.

Q. How does the effect of the Company's requests impact upon your testimony in this case?

A. I believe that should a rate increase be granted there should be relief offered in the form of increases to universal funding programs and other relief that would help low-income customers deal with any increase granted. For a typical residential customer, these requested increases are significant, but for a low-income customer, the effects can be dramatic, especially in this economic climate of inflation across many sectors. High utility costs are not the only challenge for a poor person. Our agencies have been helping low-income people for years and know firsthand that they face financial challenges on many fronts -- housing, energy costs, food and health care -- and a dramatic increase in any of those areas can have a devastating impact.

It is for these reasons that if an increase is granted it should be conditioned upon an increase in funding and relief to the Company's low-income customers.

Q. Should a request for a rate increase be granted what type of measures would you suggest be implemented for low-income customers?

A. As a result of this proceeding rates are likely to increase, a customer's ability to conserve will decrease (if the fixed monthly charge is increased) yet no additional relief is being provided to customers that would allow them to increase their conservation of energy and decrease their monthly bills. I would like to see an increase in funding that

would help low-income customers deal with an increase in ratesand in funding that would help low-income customers conserve energy.

Q. Turning now to universal service programs what issues would you like to address?

A. I want to address the Company's low-income usage reduction program (LIURP). Despite the expected increase that will likely result from this proceeding, the Company is not proposing any increase to LIURP funding.

As of January 2026, the Company has over 25,308 confirmed low-income customers. As of March of 2025, it has an estimated 57,542 low-income customers as of December 2025. Based on the Company's most recent needs assessment, the Company estimates that it would take over 200 years to provide LIURP services to the low-income units in its service territory.

Q. Do you have a recommendation regarding LIURP funding?

A. Yes. The Company has indicated that it has had issues with spending its LIURP budget. For each of the years, 2022, 2023 and 2024, the Company has had over $2M left unspent in its LIURP budget. The Company has improved on expending its LIURP budget. In 2025 it underspent by nearly $1.5M. The Company has indicated that it increased its outreach and was able to add additional LIURP subcontractors which increased its LIURP expenditures and the number of LIURP jobs completed in 2025.

I believe the Company should continue to improve its outreach and work to increase the number of LIURP contractors. The Company should also consider reducing the energy

consumption threshold requirement for its LIURP program.

Q. Do you believe that LIURP funding should be increased?

A. Yes, I do. I believe that annual LIURP funding should at the very least be increased commensurate with the percentage increase in rates for residential customers that result from this proceeding.

Q. Does this conclude your testimony?

A. Yes

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3059428
	:	
National Fuel Gas Distribution Corporation	:	

CERTIFICATE OF SERVICE

The undersigned certified that he served a copy of the foregoing Pennsylvania Weatherization Providers Task Force Statement No. 1, the Direct Testimony of Jennifer Warabak upon the following participants this 16th day of April 2026, via electronic mail:

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